

JONGENSFONTEIN GLAMPING – COMMENTS & RESPONSE TABLE

Dewald & Deidre Dippenaar (Neighbouring Landowners), 10 September

Comments	Response
<p>I would like to give comments and raise the following concerns regarding the proposed development and in particular the Biodiversity Assessments and proposed main access road / entrance directly across from Kompaslot.</p>	<p>Noted.</p>
<p>Impact study on Jongensfontein properties adjacent or situated in Boegspriet with reference to the proposed access road/ development:</p> <p>There is no mention of, or impact study done, on what impact the gravel access road / possible four-way stop will have on the residents and properties situated in Boegspriet and Kompaslot, directly across the proposed entrance. In total there are 8 houses in Kompaslot, where 7 of the houses have permanent residents and of the 7, 2 house (with permanent residents) are situated directly facing the proposed access road. This new entrance or four-way stop has serious impacts on residents and their properties.</p> <ol style="list-style-type: none"> 1. <u>Firstly, increased noise and air pollution</u>: More holiday visitors (according to the plans 2 parking's per pod which could amount to 12 cars or more plus visitors), maintenance vehicles and for the building period, construction vehicles. The four-way stop will have an impact on vehicles having to accelerate when going up the hill with an increase in noise, road related debris, automobile exhaust and other forms of pollution. The gravel road will increase dust along Boegspriet and with heavy rain, mud onto Boegspriet which, with the river of water that comes down hill with heavy rain, will have a flood impact of mud and water on residents situated on the downhill. Due to the dust from the gravel road and fire breaks, that I presume will be next to the fence along Boegspriet, residents will incur higher maintenance costs on exterior surfaces (having to clean windows etc more frequently and paint and clean more often). There will be an increase in poor visibility on Boegspriet from the gravel road dust, when we have strong gusts of wind, same as on the main road where the current gravel road intersections, cause poor visibility. 	<p>Considering several concerns received during the Pre-Application Public Participation Period on the traffic impact of the proposed development along Boegspriet Road, a traffic statement has been compiled with input from the engineer and the Municipality and included with the Draft Basic Assessment Report:</p> <ul style="list-style-type: none"> • Trip Generation: According to the engineer, the trip generation of the eventual fully developed proposed development is estimated at approximately 4 trips for the peak hour of the adjacent road network. <p>The traffic impact of the proposed development will be negligible from a traffic engineering perspective. The proposed development will be used as holiday accommodation, further reducing the impact during the peak hour.</p> <ul style="list-style-type: none"> • Traffic Calming: During discussions with the Hessequa Municipality, it was requested that the developer construct calming speed humps in Boegspriet Road on the northern approach to the intersection with Kompas Close and the development access in order to improve road safety. <p>Detailed designs of the speed humps will be submitted to the municipality for approval during the detail design stage.</p> <ol style="list-style-type: none"> 1. As part of the Environmental Application Process, an Environmental Management Plan (EMP) is compiled to ensure that the environmental impacts (including noise & dust) are managed, mitigated and kept to a minimum during all stages of the proposed development (pre-construction, construction and operational phases). The EMP is binding to the Applicant, all contractors and sub-contractors on-site. An Environmental Control Officer (ECO) must be appointed to monitor and report compliance and non-

2. Privacy issues and increased safety concerns: **Intersections** can be more prone to accidents especially with the blind rise on Boegspriet road, from the beach side. We have already had incidents with on-coming traffic when turning into Boegspriet from Kompaslot. We also have small children that currently play and ride bikes, in the quiet cul-de-sac, where the risk of being in harm's way, will be higher and the pets too. During the building period **safety** and **privacy** concerns are higher due to all why the construction vehicles/ people that will be moving in and out of the area and the increased **noise** levels. As two houses directly face this entrance their/our privacy will be 100% negatively impacted day and night with people looking directly into the houses from the exit road and at night the vehicle lights will shine directly on the houses. When we purchased these stands and built the houses facing the farm area, there was no road planned- being a farm- on the Jongensfontein border. **How will you address the privacy concern?** And why are all other farms entrances that are adjacent to Jongensfontein situated from the **main road or beach road** - why does this entrance have to be directly into the Jongensfontein housing area. Quick studies have been done to determine possible impact on the biodiversity etc, then what about the impact on the permanent residence and holiday homes?
3. Resale value of our properties: In studies done by property experts and other institutions (sources like: investopedia /maxrealestate/bhg /Private property, Estate agency's) locally and internationally, properties situated at intersections, where the above mentioned factors (noise, dust, privacy etc, etc.) play a role, home owners property values are impacted negatively (potentially 20% decline) and may be forced to sell their homes for cheaper, with a smaller pool of buyers, that will possibly look at purchasing these particular properties, located near or at intersections. Location is the number 1 factor that affects property resale value - "intersections" have a considerable impact on preferred location. Should the proposed developments entrance be situated on the main road or beach road below, the moving in and out of holiday makers/visitors, service vehicles and the construction vehicles and some of the factors mentioned above will decrease the impact on the Boegspriet and Kompaslot residents.
4. Many visitors pull off the road and take photos or use the pavement area on the farm's side, for parking, when visiting residents in Boegspriet road,

compliance to the EMP. The Holder of the EA shall comply with the environmental specifications and requirements of the EMP. Kindly refer to page 41 in the EMP for more details regarding non-compliance.

The EMP includes management actions to control dust, noise and traffic during the construction phase (Section 7.2 - 7.4 in the EMP). These management actions must be implemented to avoid negative impacts.

During the operational phase, all temporary visitors must adhere to the speed limit to minimise dust. All internal roads and parking areas will be constructed in line with the gradient, using well compacted gravel. Hence, stormwater will run over the roads as part of the landscape.

Regarding the **fire break** along Boegspriet road. According to the SCFPA, the desired height of a fire break is approximately 150mm which means that there will always be a layer of vegetation remaining (no bare soil causing dust). A fire break will be cut at least two to three times a year to maintain the desired length of vegetation. It must be noted that although the proposed development may introduce an additional fire risk (visitors braaiing for instance); it is not the sole activity that triggers the necessity of a fire break. According to the SCFPA, fire breaks must be maintained along all cadastral boundaries nonetheless whether properties are being developed or not. In addition to the property boundary fire break, a 5m wide fire break will also be cut around the proposed pods. Fire breaks are not 'bossiekapped' to prevent a fire from spreading but to allow easy access for firefighting.

2. During discussions with the Hessequa Municipality, it was requested that the developer construct calming speed humps in Boegspriet Road on the northern approach to the **intersection** with Kompas Close and the development access in order to improve road safety. Detailed designs of the speed humps will be submitted to the municipality for approval during the detail design stage.

It must be noted that **privacy** is not something that can be guaranteed at any point in time due to continuous land use changes. Especially when neighbouring land is privately owned, and development may be considered on such vacant land in accordance with the spatial development plan of a municipal area.

<p>especially during high peak holiday season this will be impacted by the new proposed entrance.</p>	<p>As stated above (#1), the EMPr provides management actions to be implemented to avoid or reduce negative impacts during the construction phase, including increased noise levels. Such as fitting and maintaining appropriate mufflers on vehicles, enclose noisy equipment such as generators and pumps, provide noise attenuation screens and where an activity is likely to cause noise nuisance to nearby residents, restrict operating hours to between 7am and 6pm weekdays and 7am to 1pm Saturday. Regarding safety concerns, it is important to note that no construction workers, apart from the security personnel, are allowed to stay on site overnight. Contractors appointed by the developer must ensure that workers are transported to and from the site daily.</p> <p>Access off Main Road was considered and deemed not acceptable by the Hessequa Municipality (planning & technical services).</p> <p>Access from Dayton Way (i.e., beach road) is not considered the best practicable environmental option:</p> <ul style="list-style-type: none"> • A short section of the access road will be within the Coastal Management Line (CML) and 20-, 50- and 100-year Erosion Risk Lines. • The access road will be within the 200m buffer delineated by the botanical/biodiversity specialist, consisting of coastal forest, protected Milkwood trees and an abundance of plant species of conservation concern. • The southern boundary is characterized by steep slopes (>25%). The access road will require a stable cut-to-fill embankment, requiring a wider disturbance envelope and the removal of more protected and threatened indigenous vegetation. • The access road will impact on fauna SCC being located within an area assessed as having a medium to high fauna sensitivity. • It must be noted that stormwater on the property drains towards the south with an existing municipal stormwater channel (to be formalised) and three (3) non-perennial drainage lines delineated by the aquatic specialist – all draining towards Dayton Way. An access road from Dayton Road cannot be designed in line with the natural slope (gradient), which is not preferred from a stormwater management perspective. By designing a road in line with the slope (as per the preferred SDP) it is ensured that rainwater
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	<p>naturally flows off the road surface, preventing water from pooling and damaging the road surface.</p> <p>3. Please be advised that any potential impacts from noise and dust will be effectively managed through the implementation of measures outlined in the Environmental Management Plan. The development of six pods of this small scale will be developed in a relatively short time period which will reduce temporary impacts that may be associated with noise/dust. Environmental monitoring and control will be a requirement and an ECO must be appointed to ensure compliance with the environmental management plan.</p> <p>The development envelope is located at a lower elevation when compared to the majority of close residences in Jongensfontein East. The single storey structures, with landscaping, will not compromise view sheds from existing houses albeit that they will be visible in the line of sight since existing houses in Jongensfontein East are all orientated to optimise views to the ocean.</p> <p>Houses closest to the proposed development envelope are, on average located at 57m above mean sea level (MSL) whereas the development envelope is, on average located at 49m above MSL. This amounts to an average of 8m difference (typically a double storey house would be between 6.5 and 8m high). Single storey structures (max 3.6m height restriction) will not obstruct sea views and as a result is unlikely to cause a significant (negative) impact on property values.</p> <p>Properties further North (in Jongensfontein East) are located at an even higher elevation on average at 74m above MSL compared to the approximate location of the development envelope at 49m above MSL. Single storey structures (max 3.6m height restriction) will not obstruct sea views from this distance or height and as a result is highly unlikely to cause a significant (negative) impact on property values.</p> <p>4. The maximum width of the intersection between Boegspriet Rd and the proposed access will be approximately 20m (similar to the intersection between Boegspriet Rd & Kompas Close) leaving the remainder of the municipal road reserve open to visitors.</p>
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Fire Risk: I understand that there is always a possibility of fire due to some or other natural occurrence but with this proposed development this risk is increased 6-fold. We often have strong gale force winds during the year, and with holiday makers/visitors renting the pods there will be braai's, bonfires and socializing, usually where alcohol is involved and one spark or piece of coal taken by the wind, could have a devastating effect on the farm and Jongensfontein.

The SCFPA compiled a Fire Management Plan which is included in the EMPr. According to the SCFPA, human negligence and possible lighting strikes (less common) will be the greatest internal fire threat that can ignite vegetation and infrastructure, spreading from pod to pod if not extinguished. If these fires are not contained, it will spread to neighbouring properties. It is however very unlikely that an internal fire will get out of control if the below precautionary measures are in place:

- A fire break will be established and maintained along the cadastral boundaries.
- A fire break will be maintained around the development site.
- General Measures (Rehab & Operational Phase)
 - The temporary disturbance footprint around each pod must be rehabilitated with low growing fire-wise vegetation including the soft landscaped areas. These areas must be maintained by means of trimming.
 - The property management / maintenance team must have first responder training (supplied by the SCFPA with a certificate of attendance).
 - Each pod must be equipped with fire hydrants.
 - No overgrown vegetation and stacks of dried vegetation are allowed against any infrastructure. Ensure gutters of all infrastructure are cleaned twice a year.
 - Each pod must be limited to one (1) designated built fire pit (i.e., braai area).
 - Continued Alien Vegetation Control
 - All pods must have outside water taps with fire hoses.
 - The unit may not be fitted with thatch roofs and building material must be fire resistant where possible.

It is also noted that the road reserve along Boegspriet Road at the point where the development is proposed is maintained with grass and aloes mostly, coupled with the existing Boegspriet Road which forms a reasonable fire break towards the existing residential area of Jongensfontein.

Rain and water flow: Kompasslot lies in a dip and when we have large amounts of rain this water gathers here, therefore the storm water drain into the farm area, with the clearing of natural vegetation for the pods the water flow from the farm area, will be re-directed and either flow down to the beach according to the drainage lines (beach and beach road is already impacted by rain/storm damage) or down the new gravel road to Boegspriet/Kompasslot causing more water/mud problems in the road and for the houses situated below (especially in Seeslot which in the past have been under water. One of the permanent residents in 5 Seeslot, has photos and videos of the water coming down from the farm area). The map below shows the drainage line from the development that directly towards those houses in Seeslot).



The existing municipal stormwater outlet and channel that discharges runoff from Boegspriet Road and Compass Road will be formalised as part of this development to ensure that (status quo) flooding of lower lying residential areas is addressed and avoided.

Stormwater measures will be implemented along the existing stormwater channel to ensure that runoff does not cause unwanted erosion within the valley which drains to the coast (noted that the Jongensfontein coastline have experienced damages due to high wave action, especially along the existing gravel road that traverse the subject property in an Easterly direction).

It is proposed to extend the existing stormwater headwall from the outlet structure to a position outside the main access road leading to the glamping pods. Stormwater from the channel will continue to be directed & discharged into a drainage line identified by the aquatic specialist.

To address existing erosion from this channel, the stormwater outfall into the drainage line will be equipped with a 3m wide gabion mattress for erosion control.

Furthermore, stormwater design on this proposed development will utilize the zero concentration methodology. No concentration or accumulation of stormwater will be allowed. All internal roads and parking areas will be constructed in line with the gradient, using well compacted gravel surfaces. Stormwater will run over the roads as part of the landscape.

Energy dissipation will be performed at all gutters to further limit concentration.

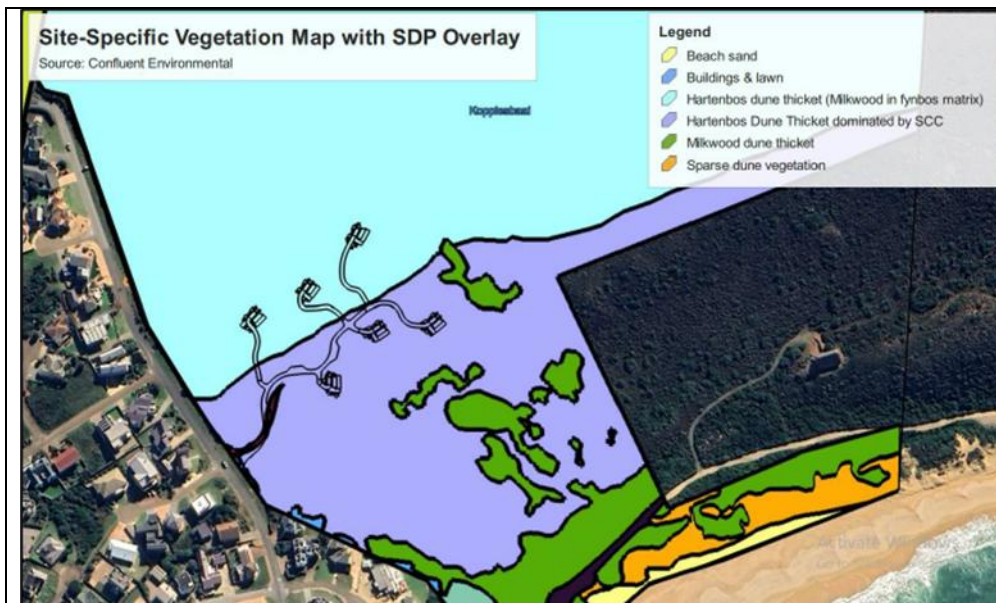
Scarcity of water and proposed sanitation system:

One of the reasons for Jongensfontein not expanding is our precious water resources. Due to natural circumstances, there could be a low rainfall season/drought etc. and should this happen and there is a shortage of water – what is proposed to supply this new development. When it comes to the proposed sanitation system, should there be leaks or problems, this will flow down to the beach. So, this remains a concern!

Water for the proposed development will be sourced from two existing boreholes on the property, namely Jongensbaai Beleggings BH1 and BH2. The long-term sustainable yields of these boreholes are 43.2 kl/day and 86.4 kl/day respectively, providing a combined yield of 131 kl/day. This capacity significantly exceeds the estimated average annual daily demand of 3.6 kl/day for the development (Borehole Study, 2006; Updated Borehole Report, 2025).

In response to concerns regarding water availability, the Hessequa Municipality was consulted. Following their review of the 2006 geohydrological study and the updated 2025 borehole report, the Municipality confirmed that they have no objection to the proposed water use.

	<p>To further reduce demand on borehole supply, each glamping pod will be equipped with rainwater harvesting tanks, dual-flush toilets, low-flow faucets and low-flow showerheads.</p> <p>Kindly note that instead of installing individual/multiple bioreactors (package plants) underneath each pod (as proposed during the Pre-App process), all sewage will flow to one (1) small conservancy tank that will be emptied by the Municipality or private service provider. Visual inspection of the tanks will be performed by the supervisor on a daily basis during peak season and on a weekly basis during low season.</p>
<p>Lastly but probably the most important are the Botanical and Biodiversity surveys:</p> <p>The documents provided, clearly states that the terrestrial biodiversity theme for the site is confirmed "Very High" and the site sensitivity in terms of terrestrial plant species on this farm is "High" and that the farm is covered in endangered Hartenbos dune thicket etc. Short single or quick/fast surveys of the area have been done at specific times, and it was not possible to identify/monitor the site for other possible threatened or rare species. A probability threshold has been used.</p> <p>The study shows that the site has been in a near natural state with minimal soil disturbance, therefore my point regarding the disturbance of nature which currently controls heavy rainfall and water flow. With the clearing for construction purposes this will change the current status.</p> <p>This biodiverse farm area should then obviously be protected. We need to ensure that there is minimal impact on terrestrial and botanical biodiversity shown on the maps that highlight the species of conservation concern "red zones" and the current animal and amazing bird life etc, on this farm. We have buck in our garden almost every evening and I know my neighbours as well and we have seen them drinking where the storm water drain is situated – sad to think that this will all change.</p> <p>The map below shows the proposed positioning of the development centred in between the endangered Hartenbos dune thicket.</p>	<p>Kindly note that the botanical/biodiversity specialist express a high level of confidence in the vegetation classification for areas surveyed in detail (study area).</p> <p>It is noted that the aquatic, biodiversity/botanical and faunal specialists all consulted each other to ensure an integrated outcome albeit still independent assessments.</p> <p>The proposed development will have a limited / low impact development footprint. The total built area amounts to approximately 0.18ha of the total 61ha. Provisions are made for a temporary footprint / envelope for disturbance during the construction phase. The botanist assessed for a 2m temporary disturbance envelope around internal roads as well as the pods including parking and deck areas. This temporary disturbance envelope will be rehabilitated with indigenous vegetation after the construction period by 1m all around and must only allow for a remaining 1m area directly around the pods to enable maintenance of the structures i.e. allow access for window washing, clearing of cutters, painting etc (can be composted material / pebbles / grass blocks). Disturbance is limited to the 2m temporary disturbance envelope (included in the EMPr to be compliant with). The remainder of the property will remain in a near natural state.</p> <p>In addition to the above, the Site Development Plan was informed by an Aquatic Specialist (Confluent Environmental), Botanical/Biodiversity Specialist (Confluent Environmental) and Fauna Specialist (Willem Matthee) who identified areas of low, medium, high and very high environmental sensitivity.</p> <ul style="list-style-type: none"> • The six glamping pods are located within areas identified as having a low fauna sensitivity and faunal specialist confirmed a low likelihood that any of the fauna SCC are likely to occur near the proposed development or will be affected by this proposed development. • Although the glamping pods are located within an area with a high Site Ecological Importance, micro-siting of each pod as well as the final route for



Why would you want to develop where construction vehicles and builders, numerous holiday makers/visitors can trample on, walk in, impact protected/endangered species, destroy, remove plants and animals (like tortoises) etc. and negatively impact this stunning biodiverse area? In my opinion there is probably a future extension or development of more Pods planned for this farm area. If this is a financial investment, 6 Pods are only the beginning, usually you do the necessary to get the 1st round approved, then it is easier for the 2nd round. A different decision regarding this farm would have been made if the importance of conservation and the amazing diversity and beauty that this farm offers was taken into consideration.

Hoping that this feedback will at least be taken into consideration, going forward.

each of the access points have been done to avoid milkwood clumps/SCCs and further micro-siting prior to construction can further reduce impact through effective search & rescue where applicable.

- The glamping pods and access roads avoid the southern-most boundary of the site where the highest concentration and largest population of SCC were identified.
- No formal watercourses are present on the property. However, three natural drainage areas, that do have a hydrological function in terms of stormwater management, were mapped by the aquatic specialist. To mitigate potential erosion, the proposed Site Development Plan avoids these areas and introduces additional measures to counter potential erosion i.e. new gabion at the existing stormwater channel traversing the property.
- The remainder of the property will maintain its status quo, and the removal of alien invasive plants will continue to avoid degradation of the Critical Biodiversity Areas which constitutes most of the property.

The outcome of the botanical/biodiversity impact assessment concluded that all potential negative impacts can be mitigated to from **moderate to minor negative**. No biodiversity offset is required from a botanical/biodiversity perspective.

Note that this Environmental Application pertains solely to the proposed development of six (6) small tourist accommodation pods. The property is privately owned and zoned Agriculture II, which permits tourist accommodation as a consent use. As such, no rezoning is required, and the property will retain its Agriculture II zoning designation.

The appointed botanist has confirmed that the scale and nature of the proposed development do not warrant a biodiversity offset, nor do they trigger any conservation or rezoning requirements.

However, the botanist has indicated that any future expansion or changes in land use—beyond the scope of this application—may necessitate a biodiversity offset.

Mr. Jan van Staden (BOCMA), 11 September 2024

Comments	Response
1. No operation is allowed within 100m of a water resource or 1:100-year flood line, whichever is greatest. If the proposed activity falls within this area, authorisation needs to be put in place in terms of the National	Noted.

Water Act (NWA), 1998 (Act No. 36 of 1998). This is to ensure that the riparian ecological status of the water resource will not be negatively impacted.	<p>No natural watercourses are present on the property. The aquatic specialist did identify three (3) drainage areas that do serve a hydrological function with respect to stormwater management and recommended these drainage areas be avoided. As per the aquatic specialist's recommendation, the proposed pods and access roads are located well outside these drainage areas.</p> <p>According to the aquatic specialist, the proposed development is not within a regulated area of a watercourse.</p>
2. Please note that any development within 500m from the boundary of any wetland requires authorization in terms of the National Water Act (NWA), 1998 (Act No. 36 of 1998).	<p>Noted.</p> <p>In terms of legislation pertaining to the NWA, the property falls outside of the regulated area of any nearby watercourses (i.e. greater than 100 m and 500 m away from a river/stream and natural wetland, respectively). No Section 21 (c) and (i) water use authorisation is therefore required for development on the property.</p>
3. No water may be abstracted from any surface water body and groundwater unless authorized by this Agency.	Noted and included in the EMPr.
4. Where solid waste disposal is to take place on site, ensure that only non-toxic materials which have no risk of polluting the groundwater, are buried in designated approved areas at acceptable depths below ground level.	Noted and included in the EMPr.
5. No surface, ground or stormwater may be polluted as a result of any activities on the site.	Noted and included in the EMPr.
6. The rehabilitation of the site must ensure that the final condition of the site is environmentally acceptable and that there will be no adverse long-term effects on the surrounding environment especially the water resource.	Noted and included in the EMPr.
7. Please note that all requirements as stipulated in the National Water Act (NWA), 1998 (Act No. 36 of 1998) must be adhered to.	Noted.
8. Please note that this Agency reserves the right to amend and/or add to the comments made above in the light of subsequent information received.	Noted.

Rene van Rooyen (owner Erf 637 No. 1 Kompas slot, Jongensfontein) 14 September 2024

Comments	Responses
<ul style="list-style-type: none"> • Ek is ten sterkste gekant teen die ingang wat die ontwikkeling beplan van 6 Glamping Pods op bg plaas. • Is daar enigsins 'n studie gemaak van die druk verkeer in Boegspriet. Die Munisipaliteit is deeglik bewus daarvan aangesien ons al spoedwalle versoek het en dit is afgekeur. 	<p>Considering several concerns received during the Pre-Application Public Participation Period on the traffic impact of the proposed development along Boegspriet Road, a traffic statement has been compiled with input from the engineer and the Municipality and included with the Draft Basic Assessment Report:</p> <ul style="list-style-type: none"> • Trip Generation: According to the engineer, the trip generation of the eventual fully developed proposed development is estimated at approximately 4 trips for the peak hour of the adjacent road network. <p>The traffic impact of the proposed development will be negligible from a traffic engineering perspective. The proposed development will be used as holiday accommodation, further reducing the impact during the peak hour.</p> <ul style="list-style-type: none"> • Traffic Calming: During discussions with the Hessequa Municipality, it was requested that the developer construct calming speed humps in Boegspriet Road on the northern approach to the intersection with Kompas Close and the development access in order to improve road safety. <p>Detailed designs of the speed humps will be submitted to the municipality for approval during the detail design stage.</p>
<ul style="list-style-type: none"> • Is daar enigsins 'n studie gemaak van die impak wat 'n grondpad en 'n vierrigting Stop op inwoners van Boegspriet en Kompas Slot gaan he. 'n Vierrigting Stop is 'n totale NEE vir ons permanente inwoners. Dit sal 'n groot impak op geraas wees van voertuie wat op en af beweeg, probeer stop en verder spoed gee (min bestuurders stop by enige Stop teken hier). • Lugbesoedeling is ook 'n groot faktor aangaande die grondpad asook paaie binnekant. Stof gaan 'n groot probleem wees met sterk winde wat gereeld waai en sal ons instandhoudings kostes opjaag van eiendom asook huise buite- en binnekant. Stof veroorsaak swak sig in Boegspriet soos die geval op die Hoofpad waar grondpaaie uit kom. Die 2 parkeer plekke per Pod 	<ul style="list-style-type: none"> • Please note that instead of a four(4)-way stop, calming speed bumps will be constructed on the northern approach of the intersection. • The internal roads and parking will be constructed in line with the gradient, using well compacted gravel surfaces. As part of the Environmental Application Process, an Environmental Management Plan (EMP) is compiled to ensure that the environmental impacts (including noise & dust) are managed, mitigated and kept to a minimum during all stages of the proposed development (pre-construction, construction and operational phases). The EMP is binding to the Applicant, all contractors and sub-contractors on-site. The Applicant must appoint an Environmental Control Officer (ECO) who is responsible to monitor and report compliance and non-compliance to the EMP. The Holder of the EA shall comply with the environmental specifications and

<p>maak die stof ook nog erger van voertuie wat in en uit beweeg asook gaste wat besoek.</p> <ul style="list-style-type: none"> Die ingang regoor Kompas Slot sal ons privaatheid versteur en veiligheid is 'n faktor. Dit is 'n rustige en vreedsame omgewing waar ons woon. Nie net 6/12 voertuie sal in en uit beweeg nie, besoekers ook en dan is daar direkte sig op ons twee huise op die hoek van Kompas Slot/Boegspriet – geen privaatheid. Daar is studies gemaak van die biodiversiteit ens op die plaas maar is ons permanente inwoners of vakansiehuise se privaatheid en eiendomme in ag geneem? 	<p>requirements of the EMP on an on-going basis. Kindly refer to page 41 in the EMP for more details regarding non-compliance.</p> <p>The EMP includes management actions to control dust, noise and traffic during the construction phase (Section 7.2 - 7.4 in the EMP). These management actions must be implemented in order to be compliant with the EMP. During the operational phase, all temporary visitors must adhere to the speed limit to minimise dust.</p> <ul style="list-style-type: none"> It must be noted that privacy (for a house in a township) is not something that can be guaranteed at any point in time due to continuous land use changes. Especially when neighbouring land is privately owned, and development may be considered on such vacant land in accordance with the spatial development plan of a municipal area .
<p>Die waarde van ons eiendomme verlaag – geraas, stof, privaatheid ens. – “Location Location” is baie belangrik vir 'n potensiele koper en 'n kruising met 'n grondpad gaan verseker 'n groot rol speel in vraag en aanbod.</p>	<p>Given the scale of the proposed development (six small glamping pods), it is unlikely to have a negative impact on property value in the area.</p>
<p>Daar is ook die groot risiko van veldbrande. Weerlig kan enige tyd die veld tref en brand veroorsaak. Kampeerders aan die anderkant maak doelbewus vuur en wat gaan gebeur indien daar nie omgesien word na die vuur wanneer die persone gaan slaap nie. Dit kan groot probleme veroorsaak en ons eiendomme is 'n direkte teiken.</p>	<p>The SCFPA compiled a Fire Management Plan which is included in the EMP. According to the SCFPA, human negligence and possible lightning strikes (less common) will be the greatest internal fire threat that can ignite vegetation and infrastructure, spreading from pod to pod if not extinguished. If these fires are not contained, it will spread to neighbouring properties. It is however very unlikely that an internal fire will get out of control if the below precautionary measures are in place:</p> <ul style="list-style-type: none"> A fire break will be established and maintained along the cadastral boundaries. A fire break will be maintained around the development site. General Measures (Rehab & Operational Phase) <ul style="list-style-type: none"> The temporary disturbance footprint around each pod must be rehabilitated with low growing fire-wise vegetation including the soft landscaped areas. These areas must be maintained by means of trimming. The property management / maintenance team must have first responder training (supplied by the SCFPA with a certificate of attendance).

	<ul style="list-style-type: none"> ○ Each pod must be equipped with fire hydrants. ○ No overgrown vegetation and stacks of dried vegetation are allowed against any infrastructure. Ensure gutters of all infrastructure are cleaned twice a year. ○ Each pod must be limited to one (1) designated built fire pit (i.e., braai area). ○ Continued Alien Vegetation Control ○ All pods must have outside water taps with fire hoses. ○ The unit may not be fitted with thatch roofs and building material must be fire resistant where possible. <p>It is also noted that the road reserve along Boegspriet Road at the point where the development is proposed is maintained with grass and aloes mostly, coupled with the existing Boegspriet Road which forms a reasonable fire break towards the existing residential area of Jongensfontein.</p>
<p>Verder gaan daar groot probleme met stormwater wees wat versteur word waarvan die Munisipaliteit bewus is. Wanneer dit reën en veral na 'n bui reën is daar baie lewende in en om die water soos dit tans is, paddas, voeltjies en selfs bokkies drink water.</p> <p>Indien dit nie goed reën om Pods se watertenks vol te hou nie en boorgate droog op waar kom die water dan vandaan. Ons is al deur baie jare hier sonder reën met waterbeperkings en gedurende vakansietye is daar waterbeperkings en almal word versoek om water bespaar.</p>	<p>The existing municipal stormwater outlet and channel that discharges runoff from Boegspriet Road and Compass Road will be formalised as part of this development to ensure that (status quo) flooding of lower lying residential areas is addressed and avoided.</p> <p>Stormwater measures will be implemented along the existing stormwater channel to ensure that runoff does not cause unwanted erosion within the valley which drains to the coast (noted that the Jongensfontein coastline have experienced damages due to high wave action, especially along the existing gravel road that traverse the subject property in an Easterly direction).</p> <p>It is proposed to extend the existing stormwater headwall from the outlet structure to a position outside the main access road leading to the glamping pods. Stormwater from the channel will continue to be directed & discharged into a drainage line identified by the aquatic specialist. To address existing erosion from this channel, the stormwater outfall into the drainage line will be equipped with a 3m wide gabion mattress for erosion control.</p> <p>Kindly note that the proposed development will not make use of municipal services including water. The calculated estimated daily water demand for the proposed development is 3.6kl/day. Water for the development will be obtained from two (2)</p>

	<p>existing boreholes situated on the property. According to the geohydrological study, the long-term sustainable yields of the boreholes is sufficient for the proposed development. The quality of the water is also acceptable for domestic use.</p>
<p>Die biodiversiteit word in al sy vorms deur die ontwikkeling bedreig en versteur asook die pragtige plantegroei langs Boegspriet gaan verwoes word deur 'n Brandpad – wat sekerlik gemaak gaan word – asook die pragtige sypaadjie wat deur die JIV instand gehou word.</p>	<p>The Site Development Plan was informed by an Aquatic Specialist (Confluent Environmental), Botanical/Biodiversity Specialist (Confluent Environmental) and Fauna Specialist (Willem Matthee) who identified areas of low, medium, high and very high environmental sensitivity.</p> <ul style="list-style-type: none"> • Although the glamping pods are located within an area with a high Site Ecological Importance, micro-siting of each pod as well as the final route for each of the access points have been done to avoid milkwood clumps/SCCs and further micro-siting prior to construction can further reduce impact through effective search & rescue where applicable. • The glamping pods and access roads avoid the southern-most boundary of the site where the highest concentration and largest population of SCC were identified. • The remainder of the property will maintain its status quo, and the removal of alien invasive plants will continue to avoid degradation of the Critical Biodiversity Areas which constitutes most of the property. <p>In addition to the above, the botanist also provided mitigation measures that will be implemented during construction & operational phases of the proposed development to minimise and/or avoid potential impacts. According to the botanical specialist, the proposed development is small enough that all impacts can be mitigated to minor impacts, which is not significantly different from the no-go scenario (i.e., status quo).</p> <p>Regarding the fire break along Boegspriet road. According to the SCFPA, the desired height of a fire break is approximately 150mm which means that there will always be a layer of vegetation remaining (no bare soil causing dust). A fire break will be cut at least two to three times a year to maintain the desired length of vegetation. It must be noted that although the proposed development may introduce an additional fire risk (visitors braaiing for instance); it is not the sole activity that triggers the necessity of a fire break. According to the SCFPA, fire breaks must be maintained along all cadastral boundaries nonetheless whether properties are being developed or not. In addition to the property boundary fire break, a 5m wide fire break will also be cut around the proposed pods. Fire breaks are not 'bossiekapped' to prevent a fire from spreading but to allow easy access for firefighting.</p>

- Daar is toegang tot die plaas vanaf die Hoofweg waar daar reeds 'n hek opgerig is. Waarom kan die ingang nie deur daardie hek wees nie. Al die ander plaase se ingang is uit die hoofpad, dit is net toeval dat hierdie plaas se grens teenaan Jongensfontein wat 'n woongebied is, loop. Waarom moet ons rus verstoort word deur van 'n pad in Jongensfontein gebruik te maak om in die plaas te kom. Die plaas is nie deel van die Kusdorp nie. Daar kan selfs toegang tot die plaas verkry word vanaf die grondpad wat uit Daytonaweg loop, die grenslyn loop tot daar.

Hierdie is my kommentaar/terugvoer en ek hoop dit sal in aanmerking geneem word. Ek het dit so duidelik as wat ek dink gedoen.

After our meeting with Hessequa Municipality, it was confirmed that they will not approve an access directly off the Main Road.

Access from Dayton Way is not preferred as access would be within the Coastal Management Line and Coastal Risk Zones and would result in the loss of Hartenbos Dune Forest, protected Milkwood trees and plant species of conservation concern.

Jongensfontein Inwoners Vereeniging (JIV) 19 September 2024

Comments

Space usage: Square metres/Loss of Fynbos.

Numerous references are made in the DBAR regarding the potential usage of space by the Project on the 61ha farm, thereby indicating how much of the natural vegetation will be removed. The following phrase is used a number of times:

“The development footprint is very small and very limited. Only 0.20ha of the total 61ha will be developed i.e., ~ 0.3% of the property”.

This comment is misleading as will be seen from the following analysis which shows a fynbos loss of 1.01 ha or 1.66% of the farm.

Responses

Kindly note that the development footprint only pertains to the permanent development footprint (i.e., built area).

Please see below updated areas for the total built areas:

Development Components	Area Per Unit	Total Units	Total Area
Glamping Pod	±26m ²	6	±156m ²
Deck	±34m ²		±204m ²
Double Carport	±18m ²		±108m ²
Total approximate built development footprint			±468m ²

Services Infrastructure	Total Area / Capacity
Internal Gravel Access Roads	± 1 129m ²
One (1) x Service Road	± 168 m ²
One (1) x Conservancy Tank	± 30m ²
One (1) x Water Reservoir	±10kl
Rainwater harvesting tanks	±2500l each

The total permanent **built** area is approximately 1 765m² (i.e., 0.1765ha).

Provisions are made for a temporary footprint / envelope for disturbance during the construction phase. The botanist allowed for a 2m temporary disturbance envelope

<div><div><div>Estimate of actual destruction of Fynbos (ha) caused by Development</div><div><div>Pages 10 & 12/94 - Complete POD and Road Area</div><div><div><div><div>Description</div><div>m²</div><div>Quantity</div><div>Area m²</div><div>ha</div></div><div><div>One-bedroom Tourist - enclosed</div><div>26.00</div><div>6.00</div><div>156.00</div><div></div></div><div><div>Deck</div><div>34.00</div><div>6.00</div><div>204.00</div><div></div></div><div><div>Carport</div><div>18.00</div><div>6.00</div><div>108.00</div><div></div></div><div><div>Total built/parking/deck for all 6 pods pg 10</div><div></div><div></div><div>468.00</div><div></div></div><div><div>Landscaping (Estimate – not in DBAR)</div><div></div><div></div><div>130.68</div><div></div></div><div><div>Actual total for 6 pods:</div><div></div><div></div><div>598.68</div><div>9.06</div></div></div><div><div><div>Length m</div><div>Width m</div><div>Area m²</div></div><div><div>Main gravel Rd length see pg 10</div><div>174.30</div><div>6.00</div><div>1045.80</div></div><div><div>Road 01 length</div><div>27.60</div><div>3.00</div><div>82.80</div></div><div><div>Road 02 length</div><div>30.00</div><div>3.00</div><div>90.00</div></div><div><div>Road 03 length</div><div>50.90</div><div>3.00</div><div>152.70</div></div><div><div>Road 04 length</div><div>73.50</div><div>3.00</div><div>220.50</div></div><div><div>Road 05 length</div><div>62.30</div><div>3.00</div><div>186.90</div></div><div><div>Road 06 length</div><div>67.20</div><div>3.00</div><div>201.60</div></div><div><div>TOTAL INTERNAL GRAVEL PG 10</div><div>311.50</div><div></div><div>934.50</div></div><div><div>TOTAL ALL ROADS PG 10</div><div>485.80</div><div></div><div>1980.30</div></div><div><div>Actual area of limitation:</div><div></div><div></div><div>1980.30</div><div>9.194</div></div><div><div>Purported area of limitation Pg12/94: No evidence provided.</div><div></div><div></div><div>2210.00</div><div></div></div></div></div></div><div><div>Page 26/94 - Pipeline area</div><div><div><div>Length m</div><div>Area m²</div><div>m² per running meter</div></div><div><div>Pipeline from borehole to reservoir:</div><div>700.00</div><div>850.00</div><div>1.21</div></div><div><div>Pipeline from reservoir to pods:</div><div>500.00</div><div>250.00</div><div>0.50</div></div><div><div>Total:</div><div>1200.00</div><div>1100.00</div><div>0.92</div></div></div><div><div>Corrected Version</div><div><div><div>Length m</div><div>m² per running meter</div><div>Area m²</div></div><div><div>Actual Total area:</div><div>1200.00</div><div>1.21</div><div>1452.00</div></div></div></div><div><div>Page 81/94</div><div><div>The Fire Protection association (EPA) will be consulted with regards to fire management including fire breaks on-site.</div><div><div><div>Length m</div><div>Width m</div><div>Area Fynbos Destruction ha</div></div><div><div>It is further proposed to maintain a 4-6m fire break along the Western boundary of the property.</div><div>1000.00</div><div>5.00</div><div>0.5</div></div><div><div>It is also proposed to allow a 4-6m strip around each glamping pod to be "bushclipped" to act as a fire break.</div><div>36</div><div>5</div><div>0.108</div></div></div><div><div>FYNBOS LOST TOTAL ha</div><div>1.611</div></div><div><div>Percentage % of 51.09%</div><div>1.64%</div></div></div></div></div></div></div>	<p>around internal roads as well as the pods including parking and deck areas. This temporary disturbance envelope will be rehabilitated with indigenous vegetation after the construction period by 1m all around and must only allow for a remaining 1m area directly around the pods to enable maintenance of the structures i.e. allow access for window washing, clearing of cutters, painting etc (can be composted material / pebbles / grass blocks). Disturbance is limited to the 2m temporary disturbance envelope (included in the EMPr to be compliant with). The remainder of the property will remain in a near natural state.</p> <p>Disturbance for the installation of the pipeline and creation of a firebreak was not included in the calculation. The installation of a water pipeline will only be a temporary disturbance which will be rehabilitated after construction.</p> <p>The specialist’s assessments include all permanent and temporary disturbance footprints.</p>
<p>Water</p> <p>It is noted that water for the six pods will be supplied by a borehole situated on the southern extremity of the farm and the JIV assumes that the long-term sustainable yield of 43.2kl/day has been accurately measured and is sufficient for ongoing use. This is important as the JIV will vehemently oppose any request from the Proponent to use water from the Jongensfontein source.</p> <p>We note further that the water will be pumped 700m to a small 10kl “reservoir” and then gravity fed 500m to the pods which also have a separate rainwater tank of unspecified size.</p> <p>The above begs the following questions/observations:</p> <ul style="list-style-type: none">• why is the water not pumped directly from the borehole to the pods?• is the BH1 borehole licenced to undertake this operation ?• The reservoir is too small.• What role does the water tank at each pod play and how big is it?• What are the plumbing arrangements at each pod?• What telemetry system is envisaged?• Where exactly will the “sewage effluent” be discharged?• Will cognisance be taken of not affecting our ground water?	<p>Noted.</p> <p><i>Why is the water not pumped directly from the borehole to the pods?</i></p> <ul style="list-style-type: none">• According to the services engineer, a water reservoir is a reliable way to distribute water especially if there is a temporary problem with the pump at the borehole. <p><i>Is the BH1 licensed to undertake this operation?</i></p> <ul style="list-style-type: none">• The water use is classified as Schedule 1 for which no formal registration or licensing is required. <p><i>The reservoir is too small.</i></p> <ul style="list-style-type: none">• According to the services engineer, the 10kl water reservoir is sufficient to supply the six (6) glamping pods. <p><i>What role does the water tank at each pod play and how big is it?</i></p> <ul style="list-style-type: none">• Primarily intended for irrigation, this system helps alleviate pressure on borehole water usage. However, in the event of a dry summer when rainwater

<p>It is the view of the JIV that the whole water reticulation system has either been poorly explained or poorly designed. Why is it necessary to pump water 1200m (with all the associated pipe friction loss) via an inadequate “reservoir” to a glamping site which is about 200m from the borehole?</p> <p>We trust that this is not a forward planning measure designed to accommodate more glamping pods in the future.</p> <p>The role of the water tanks at each pod is naively described as landscaping and car washing. If they rely on rainwater catchment then it should be noted that the entire summer period is generally dry.</p>	<p>tanks are depleted, borehole water will serve as a backup source for irrigation. Each borehole will be approximately 2500l.</p> <p><i>Sewage / Plumbing</i></p> <ul style="list-style-type: none"> • Instead of installing individual/multiple bioreactors (package plants) underneath each pod (as proposed during the Pre-App process), all sewage will flow to one (1) small conservancy tank that will be emptied by the Municipality or private service provider <p><i>Why is it necessary to pump water 1200m via an inadequate “reservoir” to a glamping site which is about 200m from the borehole.</i></p> <ul style="list-style-type: none"> • The reservoir is placed in a position where it is easily accessible and provides sufficient static pressure to the units.
<p>Fire prevention/fighting</p> <p>We refer to the following on page 62 of the DBAR:</p> <p><i>“Introducing accommodation on the property does increase the risk of wildfires through allowing open fires (braai’s). Braai’s must be restricted to on the decks only and provision must be made for sufficient firefighting equipment, fire breaks and rainwater tanks must be equipped with external water hoses.”</i></p> <p>A runaway fire on Portion 101 of the Farm Zwarte Jongersfontein No. 489 would destroy 61ha of prime fynbos.</p> <p>Accordingly, the JIV is of the opinion that the content of the above single paragraph is woefully inadequate should a fire break-out in one of the pods – which is perceived to be a very real risk. It is common knowledge that the classic South African “braai” is often accompanied by alcoholic beverage whereby the slightest distraction can lead to an accident which, in turn, ignites the surrounding vegetation.</p> <p>One needs to question what “sufficient firefighting equipment” is when faced with a fire of the magnitude possible on this farm. Fire breaks need to be diligently maintained and sufficiently wide to withstand gale force South Easterly and South Westerly winds. A small empty rainwater tank in the middle of summer is of no use regardless of its “external hoses” and regardless of whether the owner of the property is a member of a Fire Protection Association (FPA).</p>	<p>The SCFPA compiled a Fire Management Plan which is included in the Environmental Management Plan. According to the SCFPA, human negligence and possible lighting strikes (less common) will be the greatest internal fire threat that can ignite vegetation and infrastructure, spreading from pod to pod if not extinguished. If these fires are not contained, it will spread to neighbouring properties. It is however very unlikely that an internal fire will get out of control if the below precautionary measures are in place:</p> <ul style="list-style-type: none"> • A fire break will be established and maintained along the cadastral boundaries. • A fire break will be maintained around the development site. • General Measures (Rehab & Operational Phase) <ul style="list-style-type: none"> ○ The temporary disturbance footprint around each pod must be rehabilitated with low growing fire-wise vegetation including the soft landscaped areas. These areas must be maintained by means of trimming. ○ The property management / maintenance team must have first responder training (supplied by the SCFPA with a certificate of attendance).

	<ul style="list-style-type: none"> ○ Each pod must be equipped with fire hydrants. ○ No overgrown vegetation and stacks of dried vegetation are allowed against any infrastructure. Ensure gutters of all infrastructure are cleaned twice a year. ○ Each pod must be limited to one (1) designated built fire pit (i.e., braai area). ○ Continued Alien Vegetation Control ○ All pods must have outside water taps with fire hoses. ○ The unit may not be fitted with thatch roofs and building material must be fire resistant where possible. <p>It is also noted that the road reserve along Boegspriet Road at the point where the development is proposed is maintained with grass and aloes mostly, coupled with the existing Boegspriet Road which forms a reasonable fire break towards the existing residential area of Jongensfontein.</p>
<p>Traffic/Entrance</p> <p>The proposed entrance to the Glamping Pods is approximately halfway down the eastern side of Boegsprietlaan directly opposite the T-junction where Kompas Slot meets Boegsprietlaan.</p> <p>Boegsprietlaan is the second of two entrances into Jongensfontein. This busy road slopes from north to south and is bordered on the eastern side by a picturesque lawn and a vast array of aloes which have been planted over the years by the JIV.</p> <p>We refer to the following on page 33 of the DBAR:</p> <p><i>“It has been noted through input from residents residing along Boegspriet Road that vehicles do speed downhill (towards the coast) and vehicle drive fast coming uphill with the intersection position effectively being on a ‘blind’ corner, making it a dangerous intersection. There is concern from residents that vehicles accessing / leaving the development will contribute to this problem at this location without further intervention i.e. making provision for speed reducing measures and/or converting the intersection into a four-way stop. The project engineer must liaise with the</i></p>	<p>During discussions with the Hessequa Municipality, it was requested that the developer construct calming speed humps in Boegspriet Road on the northern approach to the intersection with Kompas Close and the development access in order to improve road safety. Detailed designs of the speed humps will be submitted to the municipality for approval during the detail design stage.</p> <p>With regards to stormwater –</p> <p>Yes, it is proposed to extend the existing stormwater headwall from the outlet structure to a position outside the main access road leading to the glamping pods as part of this Environmental Application. Stormwater from the existing channel will continue to be directed & discharged into the drainage area identified by the aquatic specialist.</p>

<p><i>Hessequa Municipality to investigate these options to ensure continued intersection safety.”</i></p> <p>Speeding on Boegsprietlaan is certainly a perception amongst residents and is justified to a degree. It should be noted that the JIV is not aware of any official speed monitoring by the authorities on this road nor is it privy to any accurate data to this effect.</p> <p>Non of this, which is pure supposition, should detract from the fact that the Glamping Pod entrance/exit will introduce an unnecessary complication either in the form of introducing speed reduction measures (which is an extremely lengthy process) or, more likely, a four-way stop.</p> <p>This latter option makes about as much sense as a four-way stop at a farm gate on the main road between Jongensfontein and Stilbaai and will, in the main, be ignored by most motorists thereby creating a further dangerous situation.</p> <p>In concluding this section the JIV notes that the proposed entrance will destroy a section of the aloe garden and also necessitate major reconstruction of the stormwater channel and headwall. Should the Glamping project proceed the JIV assumes that the latter project will be financed by the Proponent.</p>	
<p><u>Summary and Conclusion</u></p> <p>The question needs to be asked why the Proponent purchased Portion 101 of the Farm Zwarte Jongersfontein No. 489 in the first place. Careful perusal of the DBAR without considering the Glamping aspects presents the reader with a near perfect description of the ultimate Nature Reserve equal to and, in some aspects, even better than erf 126 (Nature Reserve) on the western boundary of Jongensfontein.</p> <p>Clearly the JIV does not have an answer to the above question and can only surmise that the temptation to make the proverbial “quick buck” regardless of the consequences has led to a situation where a potential Nature Reserve will be desecrated and the residents of Boegsprietlaan and Kompas Slot will be burdened with the prospect of a major fire directly across the street in front of their houses as well as increased traffic flow in Boegsprietlaan.</p> <p>Over and above these comments the following undesirable activities are deemed inevitable:</p> <ul style="list-style-type: none"> •Guests wandering through the Fynbos on the farm; 	<p>Kindly note that the property is privately owned and zoned Agriculture II which allows for the development of tourist accommodation as a consent use. No rezoning is required, and the property will continue to maintain its Agriculture II zoning. The remainder of the property will remain in its near-natural state with ongoing alien vegetation clearance.</p> <p>The botanical/biodiversity specialist assessed all potential negative impacts of the proposed development and concluded that these impacts can be mitigated to minor should they be implemented. These mitigation measures have been included in the Environmental Management Programme.</p> <p>Please note that this environmental application pertains exclusively to the development of six (6) glamping pods along with the necessary supporting infrastructure.</p>

<ul style="list-style-type: none"> •Quad Bikes using the roads; •Further Pods being built. <p>In conclusion and based on all of the above, the Jongensfontein Inwoners Vereeniging is totally opposed to the DEVELOPMENT OF SIX TOURIST ACCOMMODATION GLAMPING PODS on Portion 101 of the Farm Zwarte Jongersfontein No. 489.</p>	
Mr Seoka Lekota (Control Biodiversity Officer Grade B: Biodiversity Conservation), 20 September 2024	
Comments	Response
<p>1. It is noted that the overall sensitivity of the farm portion from a botanical/biodiversity perspective is deemed to be 'High' consisting of Hartenbos Dune Thicket dominated by Species of Conservation Concern (SCC) & Milkwood Dune Thicket.</p>	<p>Although the development footprint is within an area with a high botanical/biodiversity sensitivity, it is located outside the 200m buffer delineated by the specialist which consists of coastal forest, protected Milkwood trees and an abundance of Plant SCC.</p> <p>All impacts assessed are likely to have a moderately negative significance if no mitigation is applied. However, both construction and operational phase impacts can be improved to minor negative impacts. The botanist confirmed that the proposed development is small enough that all impacts can be mitigated to low/minor negative impacts, which is not significantly different from the no-go scenario (status quo).</p>
<p>2. Confirm whether the proposed development is a permissible land uses as per the land use guideline contained in the WCBSP. If permissible, ensure to optimise the project layout plan to avoid all high biodiversity value.</p>	<p>The proposed development aligns with the permissible land uses outlined in the WCBSP land use guidelines, as it is expected to have minimal botanical, biodiversity, and fauna impacts, no aquatic impact, and no heritage impact:</p> <p>The glamping pods and associated infrastructure are situated within:</p> <ul style="list-style-type: none"> • CBA (Terrestrial): Only low-impact, biodiversity sensitive land uses are appropriate. • ESA (Aquatic & Terrestrial): Some habitat loss is acceptable, provided the underlying biodiversity objectives and ecological functioning are not compromised. <p>The Site Development Plan was informed by an Aquatic Specialist (Confluent Environmental), Botanical/Biodiversity Specialist (Confluent Environmental) and</p>

	<p>Fauna Specialist (Willem Matthee) who identified areas of low, medium, high and very high environmental sensitivity.</p> <ul style="list-style-type: none"> Although the glamping pods are located within an area with a high Site Ecological Importance, micro-siting of each pod as well as the final route for each of the access points have been done to avoid milkwood clumps/SCCs and further micro-siting prior to construction can further reduce impact through effective search & rescue where applicable. The glamping pods and access roads avoid the southern-most boundary of the site where the highest concentration and largest population of SCC were identified. The remainder of the property will maintain its status quo, and the removal of alien invasive plants will continue to avoid degradation of the Critical Biodiversity Areas which constitutes most of the property. The proposed development will not impact on aquatic features being located outside the regulated area of any nearby watercourses. The development also avoids three (3) non-perennial drainage lines (medium sensitivity) as recommended by the aquatic specialist for better stormwater management. The development area has a low fauna sensitivity due to the disturbed nature of the vegetation within the development footprint, the absence of fauna Species of Conservation Concern (SCC), the lack of suitable habitat of fauna SCC within the development footprint and the low likelihood of that SCC to occur. The botanist confirmed that the proposed development is small enough that all impacts can be mitigated to low/minor negative impacts, which is not significantly different from the no-go scenario (status quo).
Monica Wills (Co-owner of Erf 7 Jongensfontein), 23 September 2024	
Comments	Response
<p>1. <u>Agriculture:</u> The following was said in the presented documents:</p> <p>“The overall conclusion of this assessment is that the proposed development is acceptable because it leads to no loss of future agricultural production potential.”</p>	<p>The agricultural assessment primarily focused on whether the exclusion of agricultural activities from the development footprint (i.e., 6 glamping pods) would change the future agricultural potential of the farm property.</p>

<p>I disagree with this statement as it is clear that a myopic view of agriculture was used in order to present a document that would underscore this application.</p> <p>This area to the south of the N2 is in my opinion very suitable to the Essential Oil industry, and especially farming and distilleries. This particular area provides a suitable climate and topography for the production of various plants and in particular indigenous fynbos oils such as various Buchu; Cape Chamomile; Cape May and Cape Snowbush. It has been observed that other healing plants such as Artemesia Afra, various Helicrysum, Rose Geranium, Brown Sage and Rosemary Verbenone also establish quickly in this particular area.</p> <p>In South Africa this industry currently sees an influx of emerging farmers who are well supported by National Government as continuous shortage outstrips global demand. This field brings together a partnership of botany, biology, chemistry, biochemistry, medicine and pharmacy as the plants mentioned above are very effective as complementary medicine and popular in the food, pharmaceutical, fragrance, flavour, cosmetic and aromatherapy markets.</p> <p>In fact, this type of farming can easily be combined with vegetables and fruit such as various types of berries, as the waste product of distilled essential oil is hydrosol which is also an effective and totally natural insecticide when it is not used or sold for its healing properties. Vegetable and berry farming allows for a “pick-your-own” experience which is a popular activity for local families and tourists.</p> <p>This kind of farming in fact underscores tourism and accordingly it is my belief that property RE101/489 Jongensfontein would be much more suitable to a tourist type eco-farm which would be far more stimulating to employment and the local economy than 6 glamping pods.</p> <p>A natural result from farming is also intensifying bee and butterfly activity, which in turn leads to increased plant pollination and honey production.</p>	<p>According to the agricultural specialist, what is of importance to an agricultural assessment is (a) its assessment of the cropping potential and (b) its assessment of the impact significance.</p> <p>Although the specialist confirms that the proposed development footprint has a medium agricultural sensitivity with a land capability which ranges from 5 to 6 (unsuitable viable cropland but suitable for other agricultural land uses), he concluded that the significance of impact of the proposed development footprint is very low, meaning that the proposed development will not cause loss of future agricultural production potential in terms of national food security given the following three (3) factors:</p> <ol style="list-style-type: none"> 1. the size of the footprint of land from which agriculture will be excluded (or the footprint that will have its potential decreased). 2. the baseline production potential (particularly cropping potential) of that land. 3. the length of time for which agriculture will be excluded (or for which potential will be decreased). <p>The proposed development is considered below the threshold for needing to be conserved as agricultural production land because of the limitations that make it unsuitable as viable cropland.</p> <p>It must be noted that the farm property will remain <u>Agriculture Zone II</u>, there will be no change in the land use of the property. Therefore, the remainder of the property (outside the development footprint of the six glamping pods) will remain Agriculture and in a near-natural state with ongoing alien vegetation management.</p>
<p>2. <u>Fauna:</u></p> <p>It needs to be noted that the area around the town of Jongensfontein has become hot property for developers and various reports have been shared with interested parties.</p> <p>One such report is on the neighbouring farm where the owners wish to establish an Eco-Estate, and the matter has been ongoing for a few years because we found that follow-up reports were required under this section. The conclusion of this matter was</p>	<p>The fauna specialist conducted a field assessment during the flight period of the butterfly species, and the field investigation was done on a sunny day with no wind. The fauna specialist did observe <i>Chrysoritis brooksi tearei</i> on an adjacent property, so the butterflies were active. However, the specialist did not observe any of the sensitive species in the area proposed for this development. According to the specialist, they are more likely to be in the less disturbed areas on the farm property (recorded as high and medium sensitivity on the sensitivity map); hence the proposal that the glamping</p>

<p>the proposed establishment of a “Butterfly Reserve” on the remainder of Erf 187. (Kindly see attached report dd 2022.)</p> <p>As residents we often notice our animals, birds and insects with interest but hardly ever do we realise which species are in danger of becoming extinct. From skeletons and shell middens that have been discovered with some constructions it is clear that this area was richly inhabited in the distant past, perhaps because of the natural fresh water sources. (See attached report dd 2003.)</p> <p>As we are now far more advanced in our co-habitation with different species, I request that a follow-up investigation under this section is conducted before the glamping pods are approved and constructed. I base my request on the basis that butterfly species in danger of extinction were found in the immediate vicinity of this site. After all, it will be in the best interest of the owners of this property as it may enhance the marketing of their “elite” camping site.</p>	<p>development takes place in the section where there is a low chance that it will affect the butterflies (low sensitivity).</p>
<p>3. <u>Fauna and Fire Prevention:</u></p> <p>I understand from the plant species and biodiversity report that the farm in its current state is a fynbos paradise and that because of its fire driven nature the owners would be required to have stringent firefighting protocol in place. Obviously, I agree with this view, however, I am afraid that glamping / camping goes hand-in-glove with summer and the South African pastime of braaiing.</p> <p>Our town is situated directly to the East of this proposed glamping site and in high season we experience South Easterly winds. This places the town, its residents and their homes in direct danger of runaway fires from this property. I am afraid the fire prevention section of this application is very weak, especially in the light of all the fires that the Western Cape experiences every year. A simple “Google” search brings up the most horrific visuals of people and animals trying to escape from raging hells.</p> <p><i>“The Wikipedia page “2024 Western Cape Wildfires” states that these fires led to the loss of 52 501ha of land in one year, of which 15 587ha were on CapeNature land. 129 “VIIRS” fire alerts were reported between September 11, 2023 and September 16, 2024 (high confidence alerts), with 52 “VIIRS” fire alerts reported in 2024.</i></p> <p><i>During the month of January 2024 six (6) wildfires had broken out in the Overstrand municipality of which two (2) were extremely difficult to contain. A code red status was issued and the residents of Silversands, Seafarms and Blesberg in the Betty’s Bay area were evacuated.</i></p>	<p>The SCFPA compiled a Fire Management Plan which is included in the Environmental Management Plan. According to the SCFPA, human negligence and possible lighting strikes (less common) will be the greatest internal fire threat that can ignite vegetation and infrastructure, spreading from pod to pod if not extinguished. If these fires are not contained, it will spread to neighbouring properties. It is however very unlikely that an internal fire will get out of control if the below precautionary measures are in place:</p> <ul style="list-style-type: none"> • A fire break will be established and maintained along the cadastral boundaries. • A fire break will be maintained around the development site. • General Measures (Rehab & Operational Phase) <ul style="list-style-type: none"> ○ The temporary disturbance footprint around each pod must be rehabilitated with low growing fire-wise vegetation including the soft landscaped areas. These areas must be maintained by means of trimming. ○ The property management / maintenance team must have first responder training (supplied by the SCFPA with a certificate of attendance). ○ Each pod must be equipped with fire hydrants.

<p><i>On January 23, 2024 a fire broke out in the Wolseley area with multiple ignitions throughout the Western Cape in the next 3 weeks. The concentration of conflagrations was in the Boland and on the Whale Coast.</i></p> <p><i>On 30 January 2024, 800 people in Pringle Bay were evacuated. On the same day the SAWS issued a level 10 warning (the highest) for veld fire conditions across central, eastern and northern parts of the province, which included Jongensfontein.</i></p> <p><i>On January 31, 2024 eight (8) fires were raging on CapeNature land throughout the Western Cape and it was only on the 7th of February that 15 days of firefighting was contained.</i></p> <p><i>In April 2024 a fire along the Table Mountain National Park was caused by a lightning strike during inclement weather conditions.</i></p> <p><i>In December 2023 a major fire raged on the mountains behind Simonstown.</i></p> <p><i>In our own Still Bay district, we have had some major fires in the past. On 23 November 2022 Mayor Andrew Stroebel from the Garden Route District posted photos of a Still Bay fire on his FaceBook page, and in 2017, 22 000ha of vegetation and farmland was destroyed by a fire in and around Still Bay.”</i></p> <p>Please, I request that more attention is given to the matter of fire prevention protocol and a redesign of the braai-areas at these glamping pods.</p> <ul style="list-style-type: none"> • Consideration can be given to firepits or build-in braais in fenced off and flat-stoned/paved (protected) areas, similar to bushveld bomas. • Strict rules and regulations should be in place, with informative material to educate future campers. They should be expelled from the camp and blacklisted when they break safety protocol. <p>A substantial fire break on the farm boundary with the town and neighbouring farm re187 is absolutely essential and simply non-negotiable.</p>	<ul style="list-style-type: none"> ○ No overgrown vegetation and stacks of dried vegetation are allowed against any infrastructure. Ensure gutters of all infrastructure are cleaned twice a year. ○ Each pod must be limited to one (1) designated built fire pit (i.e., braai area). ○ Continued Alien Vegetation Control ○ All pods must have outside water taps with fire hoses. ○ The unit may not be fitted with thatch roofs and building material must be fire resistant where possible. <p>It is also noted that the road reserve along Boegspriet Road at the point where the development is proposed is maintained with grass and aloes mostly, coupled with the existing Boegspriet Road which forms a reasonable fire break towards the existing residential area of Jongensfontein.</p>
<p>4. <u>General Observations:</u></p> <p>It has become clear to many residents that our local municipality cares little for our area and supports any and all developments proposed for this area. They clearly want to densify our area with no regard to the ageing infrastructure and limited beach facilities. Accordingly, nothing I say will stop this development. However, the developer of this site needs to consider, not only the above points, but also:</p>	<ul style="list-style-type: none"> • All recommendations have been communicated to the Applicant for further consideration. <p>In addition to the above, kindly note the following:</p> <ul style="list-style-type: none"> • The southern portion of the property will be left undisturbed due to its ecological sensitivity, which includes protected tree species and the highest

<ul style="list-style-type: none"> • That the bottom section of his property bordering the beach is a CapeNature protected area for the Black Oyster Catcher, and I would like to see this area remain as undisturbed as possible as we see less of these birds as our town becomes more densified. • That the beach directly opposite this site is of the most dangerous areas in the area with unpredictable and strong sea currents, accordingly there should be sufficient warning signs to any future campers • That the two safe swimming areas in our town are already overcrowded during high season and more people will only cause less satisfied tourists to the area. • The above three points can easily be managed by the construction of an eco-friendly and natural swimming pool in the camp. • That the amount of traffic in the area is simply insane during holidays. Thus, perhaps e-bikes should be for rent to explore the area and for visits into town • That the residents directly bordering this farm will be visually affected by these developments and that installations and construction should be shrouded as a matter of courtesy and to not negatively impact their property values • That a piecemeal extension of this development, and future re-zoning, will be vehemently opposed • That any deviation from this proposal will be reported to the relevant authorities, especially those attributed to inadequate design of braai areas, insufficient firebreaks, unsafe camping practices and wilful destruction of the environment • That the owner should consider contributing to the local Taxpayers Association (JIV) in order to help upgrade the town for the visitors he intends to introduce to our facilities, which is quite expensive to maintain. <p>I trust that should the various objections to this development not be successful, that you at the very least will consider the proposals that I have made in this objection.</p>	<p>concentration of plant species of conservation concern. In light of this, the fire break will not be extended into this area.</p> <ul style="list-style-type: none"> • Kindly note that the construction activities must be compliant with the Environmental Management Plan to reduce and/or avoid any negative impacts to neighbouring properties to dust, noise and safety. • This application only pertains the development of six (6) glamping pods. The property will not be rezoned and will remain Agriculture II.
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Couzyn Hertzog & Horak, 27 September 2024

<u>Comments</u>	<u>Response</u>
<p>Writer has been mandated by several landowners in Jongensfontein to object to the proposed development of six glamping pods on the Remaining Portion 101 of Zwarte Jongensfontein No 489, Jongensfontein.</p> <p>Writer acts of behalf of the following registered owners, duly mandated:</p> <p>Erf 347 Du Plessis AB Erf 361 Coetzee BJC Erf 362 Bekker Kobie Erf 363 Mulder WA Erf 534 Van Eeden Rhoanda Erf 367 Marren IV Erf 368 Mouton S Erf 370 Saayman S Erf 535 Jordaan Arrie & Elsabe Erf 631 Dippenaar Deidre Erf 577 Muller MA Gallie Erf 578 Cronje Jaco & Annaline Erf 579 Van Vuuren Ryna Erf 583 Swanepoel Bertus Erf 584 Ferreira D Erf 585 Van der Merwe C Erf 629 Viljoen FCD Erf 630 Oosthuizen Gert & Cindy Erf 638 Jacobs GP Erf 350 CAS Botha Beleggings (Pty) Ltd</p> <p>The abovementioned registered owners are all unified in their opposition to the proposed development and we have been mandated to very succinctly inform you of the reasons for the objection:</p>	<p>Noted.</p> <p>Couzyn Hertzog & Horak has been registered as an Interested and Affected Party in its capacity as the representative of the following landowners:</p> <p>Erf 347 Du Plessis AB Erf 361 Coetzee BJC Erf 362 Bekker Kobie Erf 363 Mulder WA Erf 534 Van Eeden Rhoanda Erf 367 Marren IV Erf 368 Mouton S Erf 370 Saayman S Erf 535 Jordaan Arrie & Elsabe Erf 631 Dippenaar Deidre Erf 577 Muller MA Gallie Erf 578 Cronje Jaco & Annaline Erf 579 Van Vuuren Ryna Erf 583 Swanepoel Bertus Erf 584 Ferreira D Erf 585 Van der Merwe C Erf 629 Viljoen FCD Erf 630 Oosthuizen Gert & Cindy Erf 638 Jacobs GP Erf 350 CAS Botha Beleggings (Pty) Ltd</p> <p>All future documentation / correspondence will be forwarded to Couzyn Hertzog & Horak (oosthuizen@couzyn.co.za).</p>
<p>1. Destroying of Kaapse Fynbos</p>	<p>The proposed development will have a limited / low impact development footprint. The total built area amounts to approximately 0.18ha of the total 61ha.</p>

<p>The proposed site for the development is situated in a pristine area of the Kaapse fynbos which will be severely contaminated, if not destroyed in the immediate surroundings of the proposed development.</p>	<p>The Site Development Plan was informed by an Aquatic Specialist (Confluent Environmental), Botanical/Biodiversity Specialist (Confluent Environmental) and Fauna Specialist (Willem Matthee) who identified areas of low, medium, high and very high environmental sensitivity.</p> <ul style="list-style-type: none"> • The six glamping pods are located within areas identified as having a low fauna sensitivity and faunal specialist confirmed a low likelihood that any of the fauna SCC are likely to occur near the proposed development or will be affected by this proposed development. • Although the glamping pods are located within an area with a high Site Ecological Importance, micro-siting of each pod as well as the final route for each of the access points have been done to avoid milkwood clumps/SCCs and further micro-siting prior to construction can further reduce impact through effective search & rescue where applicable. • The glamping pods and access roads avoid the southern-most boundary of the site where the highest concentration and largest population of SCC were identified. • No formal watercourses are present on the property. However, three natural drainage areas, that do have a hydrological function in terms of stormwater management, were mapped by the aquatic specialist. To mitigate potential erosion, the proposed Site Development Plan avoids these areas and introduces additional measures to counter potential erosion i.e. new gabion at the existing stormwater channel traversing the property. • The remainder of the property will maintain its status quo, and the removal of alien invasive plants will continue to avoid degradation of the Critical Biodiversity Areas which constitutes most of the property. <p>Provisions are made for a temporary footprint / envelope for disturbance during the construction phase. The botanist allowed for a 2m temporary disturbance envelope around internal roads as well as the pods including parking and deck areas. This temporary disturbance envelope will be rehabilitated with indigenous vegetation after the construction period by 1m all around and must only allow for a remaining 1m area directly around the pods to enable maintenance of the structures i.e. allow access for window washing, clearing of cutters, painting etc (can be composted material / pebbles / grass blocks). Disturbance is limited to the 2m temporary disturbance envelope (included in the EMP to be compliant with). The remainder of the property will remain in a near natural state.</p>
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	<p>The outcome of the botanical/biodiversity impact assessment concluded that all potential negative impacts can be mitigated to from moderate to minor negative. No biodiversity offset is required from a botanical/biodiversity perspective.</p>
<p>2. Traffic Problems</p> <p>This objection is self-explanatory. The kind of accommodation that is proposed, will undoubtedly attract not only the holidaymakers who are renting the glamping pods, but also a plethora of other visitors and joiners.</p>	<p>Considering several concerns received during the Pre-Application Public Participation Period on the traffic impact of the proposed development along Boegspriet Road, a traffic statement has been compiled with input from the engineer and the Municipality and included with the Draft Basic Assessment Report:</p> <ul style="list-style-type: none"> • Trip Generation: According to the engineer, the trip generation of the eventual fully developed proposed development is estimated at approximately 4 trips for the peak hour of the adjacent road network. <p>The traffic impact of the proposed development will be negligible from a traffic engineering perspective. The proposed development will be used as holiday accommodation, further reducing the impact during the peak hour.</p> <ul style="list-style-type: none"> • Traffic Calming: During discussions with the Hessequa Municipality, it was requested that the developer construct calming speed humps in Boegspriet Road on the northern approach to the intersection with Kompas Close and the development access in order to improve road safety. <p>Detailed designs of the speed humps will be submitted to the municipality for approval during the detail design stage.</p>
<p>3. Fire Hazard</p> <p>Once again, this objection is self-explanatory. It is common cause that the kind of holidaymakers that will rent glamping pods, will make outside fires, which can easily lead to bushfires, destroying the surrounding fynbos.</p>	<p>The SCFPA compiled a Fire Management Plan which is included in the Environmental Management Plan. According to the SCFPA, human negligence and possible lighting strikes (less common) will be the greatest internal fire threat that can ignite vegetation and infrastructure, spreading from pod to pod if not extinguished. If these fires are not contained, it will spread to neighbouring properties. It is however very unlikely that an internal fire will get out of control if the below precautionary measures are in place:</p> <ul style="list-style-type: none"> • A fire break will be established and maintained along the cadastral boundaries. • A fire break will be maintained around the development site. • General Measures (Rehab & Operational Phase) <ul style="list-style-type: none"> ○ The temporary disturbance footprint around each pod must be rehabilitated with low growing fire-wise vegetation including the soft

	<p>landscaped areas. These areas must be maintained by means of trimming.</p> <ul style="list-style-type: none"> ○ The property management / maintenance team must have first responder training (supplied by the SCFPA with a certificate of attendance). ○ Each pod must be equipped with fire hydrants. ○ No overgrown vegetation and stacks of dried vegetation are allowed against any infrastructure. Ensure gutters of all infrastructure are cleaned twice a year. ○ Each pod must be limited to one (1) designated built fire pit (i.e., braai area). ○ Continued Alien Vegetation Control ○ All pods must have outside water taps with fire hoses. ○ The unit may not be fitted with thatch roofs and building material must be fire resistant where possible. <p>It is also noted that the road reserve along Boegspriet Road at the point where the development is proposed is maintained with grass and aloes mostly, coupled with the existing Boegspriet Road which forms a reasonable fire break towards the existing residential area of Jongensfontein.</p>
<p>4. Threat to the Black Tobie</p> <p>Jongensfontein is one of the only places in South Africa where the black Tobie is still encountered in its natural habitat. Extreme conservation measures have been undertaken by the Jongensfontein Ratepayers Association over decades to protect and conserve the black Tobie. The proposed development will prejudice the conservation measures.</p>	<p>Feedback from the fauna specialist:</p> <ul style="list-style-type: none"> • Its classification is currently Least Concern according to the IUCN (as of 2021), with populations increasing. • The only part of the farm where the tobies will be is on the beach. They do not use the interior at all, and it is highly unlikely that the development (where it is placed) will disturb the birds; and • The vegetation closest to the beach (i.e., opposite the dirt road) will not be disturbed by the development, precisely because it is habitat for the Knysnaruijt's Warbler. So, there is a decent buffer between the area where the tobies can be, and the development.
<p>5. Provision of Services</p>	<p>Water for the proposed development will be sourced from two existing boreholes on the property, namely Jongensbaai Beleggings BH1 and BH2. The long-term</p>

<p>It is common cause that Jongensfontein derives its water supply from a natural fountain, which provides water to the existing population. The supply of water is scarce and it is general occurrence that severe water restrictions are imposed due to the lack of supply. To glibly state that the glamping pods will be provided for by boreholes, is a fallacy. The boreholes on the Remainder of Portion 101 draw its water from the same subterranean source as the fountain and it will exacerbate the worrying inadequate provision of water for the town of Jongensfontein. The same concern is also raised in respect of other services to be provided such as electricity, sewerage and rubbish removal.</p>	<p>sustainable yields of these boreholes are 43.2 kl/day and 86.4 kl/day respectively, providing a combined yield of 131 kl/day. This capacity significantly exceeds the estimated average annual daily demand of 3.6 kl/day for the development (Borehole Study, 2006; Updated Borehole Report, 2025).</p> <p>In response to concerns regarding water availability, the Hessequa Municipality was consulted. Following their review of the 2006 geohydrological study and the updated 2025 borehole report, the Municipality confirmed that they have no objection to the proposed water use.</p> <p>To further reduce demand on borehole supply, each glamping pod will be equipped with rainwater harvesting tanks, dual-flush toilets, low-flow faucets and low-flow showerheads.</p> <p>Sewage from each unit will be collected in a Conservancy Tank which will be pumped out by the Municipality or private service provider. Visual inspection of the tanks will be performed by the supervisor on a daily basis during peak season and on a weekly basis during low season.</p> <p>Solid waste will be removed from units by the caretaker on a daily basis. A formal solid waste collection area will be provided adjacent to the main access gate. The facility will be enclosed to avoid attracting vermin. A formal arrangement for the removal of solid waste needs to be entered into with the Hessequa Municipality.</p> <p>A Bulk electrical supply to the proposed development is not available from the municipality and is not required. Each unit will be supplied with an individual roof mounted PV Solar and battery system. Units will be equipped with gas stoves and gas geysers in order to limit the design requirements of the PV Solar system.</p>
<p>6. Thin End of the Wedge</p> <p>There are already rumours that the proposed six glamping pods will be extended to 40 once approvals has been granted, despite gallant opposition thereto. There is also talk of a quad bike course being established in the immediate vicinity of the glamping pods. Such a development will severely and negatively impact on the peace and quiet of Jongensfontein, which is nowadays such a scarce and valuable asset.</p>	<p>Please note that this environmental application pertains exclusively to the development of six (6) glamping pods along with the necessary supporting infrastructure. The land use designation will remain as Agricultural Zone II.</p>
<p>7. General</p> <p>Notice must be taken that the existing registered owners of Jongensfontein will meet any attempt to develop the glamping pods with a virilous defensio. In the unlikely</p>	<p>Noted.</p> <p>Oosthuizen House is registered as an Interested and Affected Party and will receive any future documentation / correspondence in respect of the proposed development.</p>

<p>event of the development being approved by the responsible authorities, notice must be taken by the proposed developers that the residents will approach the High Court to take such an approval on review.</p> <p>Please be so kind as to register this company in its representative capacity as an interested and affected person and please provide to us all information, documentation and material in respect of the proposed development.</p>	
<p align="center">leptieshaam Bekko (Control Environmental Officer Sub-Directorate: Coastal Management) 27 September 2024</p>	
Comments	Response
<p>1. The proposal entails the development of six tourist accommodation glamping pods on a portion of the Remainder of Portion 101 of the Farm Zwarte Jongersfontein. Each glamping pod is proposed to have its own deck; carport; water tank; underground sewage bioreactor; limited landscaped area (which will also serve as a fire break; and internal roads are also proposed to access the glamping pods.</p>	<p>Noted.</p>
<p>2. On page 33 of the draft BAR the applicant indicated that the NEM: ICMA is not considered an applicable legislation for the proposed development. Be advised that Erf 6502 in its entirety is located within the coastal protection zone and as such the NEM: ICMA is indeed applicable, and it should be indicated as such in the draft BAR.</p>	<p>Noted and included in the Draft Basic Assessment Report.</p> <p>Kindly note that the proposed development is on Portion 101 of the Farm Zwarte Jongersfontein and not Erf 6502.</p>
<p>3. The applicant accurately noted the subject property in relation to critical biodiversity and ecological support areas in accordance with the Western Cape Biodiversity Spatial Plan 2017. The SD: CM notes that the number of units was informed by the site constraints which identified a small portion of the subject property deemed less sensitive compared to the remainder of the property – the location of the proposed development was also informed by inputs received from the Aquatic Specialist; Botanical/Biodiversity Specialist and the Faunal Specialist.</p>	<p>Noted.</p>
<p>4. The applicant has depicted the subject property relation the Coastal Protection Zone (“CPZ”) as defined in Section 16 of the NEM: ICMA in Appendix A2 (Coastal Risk Lines) and it should be noted that the purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the</p>	<p>Noted.</p>

<p>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. As such, Section 63 of the NEM: ICMA must be considered by local authorities for land use decision making.</p>	
<p>5. The Garden Route District Coastal Management Line ("CML") in relation to Erf 6503 has been adequately considered. The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, inter alia and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both the quantification of risks and pro-active planning for future development. The SD: CM can confirm the proposed development on Farm RE/101/489 will occur landward of the CML.</p>	<p>Kindly note that the proposed development is on Portion 101 of the Farm Zwarte Jongersfontein and not Erf 6503.</p> <p>Noted.</p>
<p>6. The SD: CM is satisfied with the location of the proposed development on the subject property as it aims to avoid all environmentally sensitive areas and also aligns with the Departmental Circular (DEAD&DP 0004/2021) on the Consideration of Coastal Risk in Land Use Decisions as well as the way forward with respect to the establishment of Coastal Management Lines in terms of the NEM: ICMA.</p>	<p>Noted.</p>
<p>7. According to the Western Cape Provincial Coastal Access Audit for the Garden Route Municipal District (2019), the subject stretch has ample vehicle access to the coast to the coast. Be advised that in accordance with Section 13 of the NEM: ICMA, the proposed development and associated activities may in no way impede the general public's ability to access coastal public property now or in the future. Furthermore, the applicant should be</p>	<p>Noted.</p>

informed that they may not create any formal or informal walkways/pathways to the coast through the littoral active zone, with any future developments on the subject property as this is an active area that performs an important ecological function.	
8. Considering the location of the subject property, the applicant must be informed of risk pertaining to the loss of property should the highwater mark of the sea move inland of the property boundary. In this regard, Section 14 of the NEM: ICMA and the Advisory Note from the Office of the Chief Surveyor-General dated 15 October 2021, is applicable.	Noted.
9. Based on the information provided, the SD: CM does not object to the proposed development on Farm RE/101/489 Jongensfontein, provided all the abovementioned items are taken into considerations the proposed mitigation measures as proposed in the draft EMPr are strictly adhered to if the proposed development is approved.	Noted. All abovementioned items are taken into consideration.
10. 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.	Noted and included in the EMP.
11. The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.	Noted.

Carel van der Merwe (Neighbouring Landowner), 28 September 2024

Comments	Response
As Trustee of Lushof Trust, I am mandated to object to the proposed development of six glamping pods on the Remaining Portion 101 of Zwarte Jongensfontein No 489,	Considering several concerns received during the Pre-Application Public Participation Period on the traffic impact of the proposed development along Boegspriet Road, a

<p>Jongensfontein. We are strongly opposed to the proposed development for the following reasons:</p> <p>1. <u>Traffic:</u></p> <p>Your documentation mentions that no traffic studies have been conducted as only six new units are added and thus not necessary. This is a serious oversight, and this type of reasoning is exactly the reason why we already have dangerous traffic conditions in Boegspriet ave., specifically during holiday periods. We have been coming to Jongensfontein since 1986 when Boegspriet was a very quiet street. Over the years small developments have taken place and everytime it was regarded as a small traffic impact. All these have however accumulated to the fact that during holiday periods it is dangerous to get in and out of our driveway. Even more dangerous to walk or cycle in Boegspriet. There are currently <u>NO traffic calming</u> in Boegspriet and while the majority of vehicles are substantially exceeding the speed limit, NO law enforcement is taking place.</p> <p>This is a small quiet holiday resort where people should be safe in the streets and which is currently not the case.</p> <p>Extra traffic will not only come from the owners of the Glamping Pods but also from their visitors. We are also aware of a similar application on Farm 558 which is close to the current application. Although they will not use Boegspriet as entrance, it will certainly be used to get to the beach of Jongensfontein.</p> <p>Furthermore, there is also a development application on the Northern side of Hoofweg which will again generate substantial traffic of visitors to the beach.</p> <p>The accumulation of all this traffic will just make Boegspriet and other streets more dangerous.</p>	<p>traffic statement has been compiled with input from the engineer and the Municipality and included with the Draft Basic Assessment Report:</p> <ul style="list-style-type: none"> • Trip Generation: According to the engineer, the trip generation of the eventual fully developed proposed development is estimated at approximately 4 trips for the peak hour of the adjacent road network. The traffic impact of the proposed development will be negligible from a traffic engineering perspective. The proposed development will be used as holiday accommodation, further reducing the impact during the peak hour. • Traffic Calming: During discussions with the Hessequa Municipality, it was requested that the developer construct calming speed humps in Boegspriet Road on the northern approach to the intersection with Kompas Close and the development access in order to improve road safety. <p>Detailed designs of the speed humps will be submitted to the municipality for approval during the detail design stage.</p>
<p>2. <u>Water and Sanitation</u></p> <p>Jongensfontein is already suffering from water shortages during every December period. The fact that boreholes are proposed for this and the other proposed developments, does not solve the problem as it is the same underground resources where Jongensfontein gets its water from. The increased usage of boreholes will also deplete the scarce water resources for Jongensfontein. This has been one of the main reasons why proposed new developments have NOT been approved in the past. It must also be noted that there are still approved undeveloped erven in Jongensfontein which will in future also make use of these resources. We are also</p>	<p>Water for the proposed development will be sourced from two existing boreholes on the property, namely Jongensbaai Beleggings BH1 and BH2. The long-term sustainable yields of these boreholes are 43.2 kl/day and 86.4 kl/day respectively, providing a combined yield of 131 kl/day. This capacity significantly exceeds the estimated average annual daily demand of 3.6 kl/day for the development (Borehole Study, 2006; Updated Borehole Report, 2025).</p> <p>In response to concerns regarding water availability, the Hessequa Municipality was consulted. Following their review of the 2006 geohydrological study and the updated</p>

<p>not convinced that the proposed sanitation solution will not contribute to a smell to residents in the vicinity as the Southwestern wind is blowing towards the current residents.</p>	<p>2025 borehole report, the Municipality confirmed that they have no objection to the proposed water use.</p> <p>To further reduce demand on borehole supply, each glamping pod will be equipped with rainwater harvesting tanks, dual-flush toilets, low-flow faucets and low-flow showerheads.</p> <p>Kindly note that instead of installing individual/multiple bioreactors (package plants) underneath each pod (as proposed during the Pre-App process), all sewage will flow to one (1) small conservancy tank that will be emptied by the Municipality or private service provider. Visual inspection of the tanks will be performed by the supervisor on a daily basis during peak season and on a weekly basis during low season.</p>
<p>3. <u>Visual Impact</u></p> <p>The proposed glamping pods will also have a negative visual impact and destroy the quiet nature that we currently experience. This was one of the main reasons for investing in this quiet holiday town. Property values will be negatively affected.</p>	<p>The following measures must be implemented to mitigate potential visual impacts:</p> <p>Scale of development: The proposal is limited to six (6) one-bedroom glamping pods. The design of the proposed units will be based on the 'Tiny Home' concept called 'Pods' with a total footprint of 60m².</p> <p>Height restriction: Each pod will not exceed a total height of 3.6 m, thereby reducing visual prominence. Below is a schematic image indicating the type of design using natural materials that will fit with the natural environment. Noting also that the development envelope will on average be 8m lower (natural ground level) than the closest properties in Jongensfontein East.</p>



Clustered siting: The units will be grouped within a visually discreet node. This approach preserves the rural character and natural beauty of the landscape by avoiding the visual fragmentation and environmental disturbance that can result from dispersing units across the site.

Lighting management: All external lighting will be low-level to minimise visual intrusion and reduce night-time disturbance to fauna and insects.

The development envelope is located at a lower elevation when compared to the majority of close residences in Jongensfontein East. The single storey structures, with landscaping, will not compromise view sheds from existing houses albeit that they will be visible in the line of sight since existing houses in Jongensfontein East are all orientated to optimise views to the ocean.

Houses closest to the proposed development envelope are, on average located at 57m above mean sea level (MSL) whereas the development envelope is, on average located at 49m above MSL. This amounts to an average of 8m difference (typically a double storey house would be between 6.5 and 8m high). Single storey structures (max 3.6m height restriction) will not obstruct sea views and as a result is unlikely to cause a significant (negative) impact on property values.

	Properties further North (in Jongensfontein East) are located at an even higher elevation on average at 74m above MSL compared to the approximate location of the development envelope at 49m above MSL. Single storey structures (max 3.6m height restriction) will not obstruct sea views from this distance or height and as a result is highly unlikely to cause a significant (negative) impact on property values.
<p>4. <u>Destroying of Kaapse Fynbos</u></p> <p>My understanding is that the studies show that the development does have a risk of destroying sensitive areas. Unfortunately, our experience is that the control measures during the building period, and later on, are not always in place to ensure proper compliance. We have had experience with other developments around us where we had to intervene, but it was then too late, and the damage was done.</p>	<p>As part of the Environmental Application Process, an Environmental Management Plan (EMP) is compiled to ensure that the potential environmental impacts are managed, mitigated and kept to a minimum during all stages of the proposed development (pre-construction, construction and operational phases). The EMP is binding to the Applicant, all contractors and sub-contractors on-site. The Applicant must appoint an Environmental Control Officer (ECO) who is responsible to monitor and report compliance and non-compliance to the EMP. The Holder of the EA shall comply with the environmental specifications and requirements of the EMP on an on-going basis.</p>
<p>5. <u>Fire</u></p> <p>This proposed development increases the fire risk and poses a big risk for the residents of Boegspriet, especially with strong Southwestern winds, which is often the case.</p>	<p>The SCFPA compiled a Fire Management Plan which is included in the EMP. According to the SCFPA, human negligence and possible lighting strikes (less common) will be the greatest internal fire threat that can ignite vegetation and infrastructure, spreading from pod to pod if not extinguished. If these fires are not contained, it will spread to neighbouring properties. It is however very unlikely that an internal fire will get out of control if the below precautionary measures are in place:</p> <ul style="list-style-type: none"> • A fire break will be established and maintained along the cadastral boundaries. • A fire break will be maintained around the development site. • General Measures (Rehab & Operational Phase) <ul style="list-style-type: none"> ○ The temporary disturbance footprint around each pod must be rehabilitated with low growing fire-wise vegetation including the soft landscaped areas. These areas must be maintained by means of trimming. ○ The property management / maintenance team must have first responder training (supplied by the SCFPA with a certificate of attendance). ○ Each pod must be equipped with fire hydrants. ○ No overgrown vegetation and stacks of dried vegetation are allowed against any infrastructure. Ensure gutters of all infrastructure are cleaned twice a year.

	<ul style="list-style-type: none"> ○ Each pod must be limited to one (1) designated built fire pit (i.e., braai area). ○ Continued Alien Vegetation Control ○ All pods must have outside water taps with fire hoses. ○ The unit may not be fitted with thatch roofs and building material must be fire resistant where possible.
<p>6. General</p> <p>We are also aware of rumours where it is planned to expand the development on an incremental basis as soon as the first one is approved. As mentioned earlier, this piece-by-piece development does not take the bigger picture into account and before long we have a much bigger problem than is already the case. This is why it is critical that step one not be approved.</p>	<p>Kindly note that this environmental application is only for the development of six (6) glamping pods and internal access roads.</p> <p>The property is privately owned and zoned Agriculture II which allows for the development of a tourist accommodation as a consent use. No rezoning is required, and the property will continue to maintain its Agriculture II zoning.</p>
<p align="center">Rhett Smart (Cape Nature) 30 September 2024</p>	
Comments	Response
<p>Desktop Information</p> <p>The majority of the property is mapped as Critical Biodiversity Area 1 (CBA) in the Western Cape Biodiversity Spatial Plan (BSP) with patches of Ecological Support Area 1 (ESA) in the south-west and north. The vegetation on site is mapped as Hartenbos Dune Thicket listed as endangered. A drainage line is mapped in the south with a seep wetland mapped along the southern coastal section.</p> <p>The results from the screening tool indicate very high sensitivity for terrestrial biodiversity and aquatic biodiversity, high for animal species and medium for plant species. No site sensitivity verification report is provided, however a Plant Species and Terrestrial Biodiversity Assessment, Animal Species Compliance Statement and Aquatic Biodiversity Compliance Statement were compiled which address the four ecological themes listed.</p>	<p>Noted.</p>
<p>Specialist Plant Species and Terrestrial Biodiversity Report</p>	

1. The vegetation occurring on the property is verified to consist of Hartenbos Dune Thicket as mapped in the SA VegMap. The description states this vegetation type occurs on an alluvial substrate (deposited by watercourses) however the substrate for dune thicket is predominantly aeolian (deposited by wind). The proposed footprint for the six pods only occupies a small proportion of the property and the habitats affected are defined as Hartenbos Dune Thicket dominated by Plant Species of Conservation Concern (SCC) and Hartenbos Dune Thicket. The patches of milkwood thicket are located outside of the proposed footprint. Alien invasive species are one of the primary threats to this vegetation type however, relatively low levels of alien invasive species were encountered with infestations only observed the area around the furrow. A description of Hartenbos Dune Thicket is provided, and it is evident that a number of the species listed as typical of the vegetation type are present on site (Grobler *et al* 2018). We wish to however query the relevance of indicating species where a different species of the same genus is present.
2. Reference is made to the BSP, and the vegetation types referred to in the reasons layer, namely Albertinia Sand Fynbos and Blombos Strandveld. These were the two vegetation types mapped for the site in the initial SA VegMap, which was relevant at the time of the development of the BSP, as well as the then current threat statuses (2017). We wish to note that the previous mapping aligns more or less with the Vlok vegetation types which have been included in the report with the Ystervarkpunt Forest-Thicket-Fynbos aligning with the Albertinia Sand Fynbos and the Gouritz Dune Thicket aligning with the Blombos Strandveld albeit slightly more extensive. We further wish to note that the vegetation assessment for a neighbouring property (Erf 187) indicated that the previous mapping is more accurate with Blombos Strandveld present on the slopes below the plateau and Albertinia Sand Fynbos on the plateau with Canca Limestone Fynbos outcropping on the edge of the plateau. We recommend that a response is provided regarding a comparison between the mapping for the initial SA VegMap and the current VegMap as it is necessary to ensure consistency in evaluating applications. Please also refer to the discussion below regarding the habitat mapping for the animal species compliance statement.

1. According to the botanist, there is no relevance of indicating species where a different species of the same genus is present.
2. Both Hartenbos Dune Thicket and Albertinia Sand Fynbos is considered Endangered vegetation types. Although the fynbos matrix can be considered part of Hartenbos Dune thicket, it also meets the requirements to be considered Albertinia Sand Fynbos. This is because, similar to Hartenbos Dune thicket, Albertinia Sand Fynbos is characterised by plains and undulating hills with numerous dune slacks with medium tall (1.5–2 m tall) open shrub layer, together with a dense stratum of 1–1.2m tall shrubs and hemicryptophytes. In other words, both Hartenbos Dune Thicket and Albertinia Sand Fynbos vegetation type descriptions acknowledge that a mosaic of thicket and fynbos comprise the vegetation type.

Interestingly, both vegetation type descriptions mention *Leucospermum praecox* as an important taxon, with Albertinia Sand Fynbos citing it as a dominant species, while *Agathosma muirii* is mentioned as an important taxon only in the Hartenbos Dune Thicket vegetation type description. Furthermore, it is also important to note that the National Vegetation Map has been subject to past revision and changes, which all affect the vegetation mapping and BSP layers recognised on the property. It is important to consider differences between older and updated mapping to ensure consistency between site assessments in the area.

A detailed vegetation study was undertaken primarily within the proposed development area, where comprehensive field surveys were conducted. For the remainder of the portion, vegetation mapping was produced based on broader observations and existing data, but these areas were not surveyed in the same level of detail. Based on this, it is the opinion of the author that the vegetation within the study area can be confidently classified as Hartenbos Dune Thicket, characterized by a mosaic of thicket and fynbos elements.

Where thicket components are largely absent and the vegetation consists predominantly of fynbos without the mosaic element; it could be considered Albertinia Sand Fynbos. However, the majority of the site exhibits characteristics consistent with Hartenbos Dune Thicket, supporting this classification overall. Therefore, the author expresses a

3. The proposed glamping pods are located predominantly within the ESA patch in the south although it appears to encroach into CBA. The biodiversity overlay maps should rather indicate the layout than a block for more accurate interpretation. The previous vegetation mapping could be one of the reasons for the designation of the ESA patch. We wish to note that the BSP has been updated and through a public participation process. In the draft update the ESA patches are now CBA and one of the reasons could be the change in the vegetation mapping as discussed above.
4. A total of six plant SCCs were recorded two of which are vulnerable and reported as dominant species in the Hartenbos Dune Thicket dominated by plant SCCs, with the other species listed as near threatened. We note that only a portion of the property was surveyed and the report states that additional surveys would be required if the scope of the project is expanded. The delineation of the vegetation types across the site could therefore be queried particularly directly north of the southern survey area. Most importantly, SCCs were not encountered in the western sections of the proposed development area. However, we recommend that the micro-siting of the pods should avoid the presence of the SCCs, in particular large concentrations of SCCs. The overall development footprint is small enough to allow for avoidance.
5. The site ecological importance (SEI) has been calculated for the identified habitats. However, the SEI is defined in the Species Environmental Assessment Guideline which was developed for the plant species and animal species themes. The SEI should therefore be calculated for the plant SCCs and not the identified habitats which are relevant to the terrestrial biodiversity theme. If the habitats are used as the features assessed in the SEI, the presence of SCCs should be the primary determining feature. In this regard we wish to query the same SEI for the two Hartenbos Dune Thicket communities, with the one typified by an abundance of SCCs and the other with minimal occurrence of SCCs. A draft Ecosystems Environmental Assessment Guideline has been developed but is not yet approved for use. The SEI over the

high level of confidence in the vegetation classification for areas surveyed in detail.

3. According to the 2017 Western Cape Biodiversity Spatial Plan (WC-BSP), the development site is located within an Ecological Support Area 1 & Critical Biodiversity Area 1.

The 2023 WC-BSP was formally adopted into law on the 13th of December 2024 (Gazette Extraordinary 9017) in alignment with the Western Cape Biodiversity Act (No. 6 of 2022), and marks the replacement of the 2017 WC BSP with the 2023 WC BSP. According to the 2023 WC BSP, the entire development site falls within a Critical Biodiversity Area 1.

However, it is noted that all investigations, studies and/or legal processes initiated prior to the 13th Dec 2024 will still recognise the 2017 WC BSP as the official biodiversity prioritisation data informant. Therefore, this Basic Assessment still recognise the 2017 WC BSP as the official data informant although the 2023 version is duly acknowledged.

Please see below SDP overlay on the 2017 WC BSP instead of the block.



<p>majority of the property is rated as high, including the development footprint, apart from the existing furrow and road.</p> <p>6. The impact assessment identified three impacts namely construction phase loss of habitats, construction phase loss of SCCs and operational phase loss of habitat and SCCs from inappropriate land management. The impacts are all rated as moderate prior to mitigation and minor after mitigation (assumed to be equivalent to medium and low respectively). <u>We recommend that the impact assessment for SCCs should be revised after ground-truthing of the footprints with avoidance as far as possible.</u></p> <p>7. The proposed mitigation measures are supported. The inclusion of a fire management plan is supported and should be included as an appendix to the application. Fire management should not only incorporate measures to minimize the fire risk to the proposed development such as appropriately located firebreaks but should also incorporate planned burns. Fire is essential for the regeneration of the typical fynbos species occurring on the site such as <i>Leucospermum praecox</i>. We recommend that gardens and landscaping should be minimized as far as possible to only incorporate essential vegetation reduction to minimize fire risk. Gardens and landscaping should be considered part of the disturbance footprint.</p> <p>8. The recommendation that impacts can be reduced to low with mitigation is supported and therefore the development is considered acceptable from a terrestrial biodiversity and plant species perspective and no biodiversity offset is considered necessary. Although concerns have been raised regarding the mapping of the vegetation on the property and the application of the SEI, these considerations do not significantly change the recommendation regarding the acceptability of the development proposal due to the small footprint of the development relative to the remainder of the property. Nonetheless responses should be provided to concerns raised and ground-truthing of the footprints must be undertaken to ensure that the least sensitive footprints are selected. Should the applicant wish to formally conserve the remainder of the property, CapeNature can be approached in this regard.</p>	<p>4. The current Site Development Plan (SDP) has been designed to avoid the southernmost buffer zone, where the highest concentration of plant Species of Conservation Concern (SCC) was recorded. This avoidance is considered acceptable from an ecological impact perspective. Notwithstanding this, there remains a possibility that additional plant SCC may establish between the initial site survey and the commencement of construction activities.</p> <p>5. All the methods and reasoning outlined in Table 5 are consistent with the guidance provided by the Species Environmental Guidelines (Verburgt et al., 2020). These guidelines advocate for a holistic approach, focusing not only on the species of conservation concern (SCC) but also on the broader environmental context in which they occur. Hence the outcome is an indicator of the ecological importance, and not just the SCC sensitivity. This includes detailed consideration of the habitat and vegetation types that are essential to the ecological integrity of the area. Although vegetation types are primarily addressed under the terrestrial biodiversity theme, they play a crucial role in shaping the ecological niches and habitats that sustain SCC populations. Therefore, by accounting for both habitat quality and vegetation dynamics, the assessment ensures that the interconnected factors influencing species persistence are adequately addressed. This approach strengthens the validity of the findings of this report and reinforces the notion that habitat protection <i>in situ</i> must be a key strategy for successful SCC conservation.</p> <p>6. The current Site Development Plan (SDP) has been designed to avoid the southernmost buffer zone, where the highest concentration of plant Species of Conservation Concern (SCC) was recorded. This avoidance is considered acceptable from an ecological impact perspective. Notwithstanding this, there remains a possibility that additional plant SCC may establish between the initial site survey and the commencement of construction activities.</p> <p>In light of this, and in place of pre-construction ground-truthing of the development footprints, it is recommended that a targeted search-and-rescue operation for plant SCC be undertaken immediately prior to site</p>
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	<p>clearance. Implementation of this measure is expected to effectively reduce the residual impact significance from moderate to minor.</p> <p>7. Noted. A fire management plan is included as an appendix to this Application. Garden / landscaping areas are assessed as part of the disturbance footprint.</p> <p>Proposed soft landscaping areas for each pod & associated infrastructure (parking & deck areas) are divided into two (2) sections.</p> <p><u>Section 01</u>: L-Shaped landscaping area next to each pod & deck area. This area will consist mostly of indigenous grass with fire-wise plant species and will serve as an additional fire break for each pod.</p> <p><u>Section 02</u>: this section is limited to the 2m temporary disturbance envelope around each pod and associated infrastructure (parking, deck). The Applicant proposes to rehabilitate 1m of this 2m disturbance area with indigenous trees and shrubs whilst still allowing a 1m access to around the pods for maintenance.</p> <p>8. Noted. Kindly refer to the above responses.</p>
<p>Animal Species Compliance Statement</p> <p>1. The animal species compliance statement evaluated the potential presence of any animal SCCs as listed in the screening tool in addition to any other SCCs that may occur. We wish to note that the map for the animal species theme in a screening tool report generated for the site on 30 September 2024 includes high sensitivity areas unlike the map shown in the screening tool report included in the animal species compliance statement and Appendix I. A site survey was conducted and none of the SCCs in the screening tool were observed.</p> <p>2. Faunal habitats are defined and mapped in order to determine the spatial distribution of faunal sensitivity. The habitats listed are short Hartenbos Dune Thicket near the shore; medium height Hartenbos Dune Thicket along the main road and in a clump in the eastern section; and ratioed fynbos on a sandy substrate. Restioid fynbos on a sandy substrate correlates well with Albertinia Sand Fynbos. Proteoids are considered to be rare in the fynbos</p>	<p>1. The fauna specialist has acknowledged the amendment to the screening tool report and confirmed that this revision does not affect the findings or conclusions of his impact assessment.</p> <p>2. According to the Fauna Specialist, the baseline description of vegetation in the faunal report was based on the Mucina & Rutherford description. He agrees with the botanical specialists' response in that the study area is more representative of Hartenbos Dune Thicket. However, the study area is degraded from a fauna habitat perspective and is therefore deemed to have a low fauna sensitivity.</p> <p>3. The fauna specialist conducted a field assessment during the flight period of those butterfly species, and the field investigation was done on a sunny day with no wind. The fauna specialist did observe <i>Chrysoritis brooksi tearei</i> on an adjacent property, so the butterflies were active. However, the specialist did not observe any of the sensitive species in the area</p>

vegetation, but *L. praecox* is present on the border with the coastal thicket vegetation. We wish to note that the habitat description does not correlate well with the mapping of the habitats in the terrestrial biodiversity assessment. We further wish to note that the description of the habitats in the animal species compliance statement support the classification of Blombos Strandveld and Albertinia Sand Fynbos as the two main vegetation types occurring on the property.

3. The likelihood of the species flagged in the screening tool occurring on the property indicates a high likelihood for two species, medium likelihood for five species, and a low and very low likelihood for one species each. For the three butterfly species (all listed as endangered), a high likelihood is recommended for *Chrysoritis brooksi tearei* as the species was recorded on an adjacent property. *Aloeides thyra orientis* and *Lepidochrysops littoralis* are both considered a medium likelihood of occurring, however we wish to advise that both of these species have been found on an adjacent property (Erf 187) and a conservation area is in the process of being formed to conserve these two species, as advised by the project faunal specialist.
4. The other species flagged are bird species and we support the recommendation that these species would be less likely to occur adjacent to existing urban development and that the small footprint of the development relative to the remaining natural habitat is unlikely to have a significant impact. None of the animal species recorded on site are SCCs. We wish to note however that *Lepisiota capensis*, an ant species, was recorded on the site, and is the host for the larvae of *Aloeides thyra orientis* as advised in the faunal study for Erf 187.
5. The sensitivity mapping indicates the thicket habitat as high sensitivity and the disturbed area at the footprint of the proposed development as low sensitivity, with the remainder as medium sensitivity. The proposed development is therefore located on the least sensitive area of the site. The recommendations of the animal species compliance statement are supported whereby the development is considered acceptable provided that the remainder of the property is not developed. We however recommend that there is further investigation of the presence of endangered butterflies on the

proposed for this development. Although the area where this development is planned does have sandy open areas (due to the disturbed nature of that area), which are suitable for *Aloeides thyra orientis*, there were no specimens of them observed during the field visit. According to the specialist, they are more likely to be in the less disturbed areas (recorded as high and medium sensitivity on the sensitivity map); hence the proposal that the glamping development takes place in the section where there is a low chance that it will affect the butterflies (low sensitivity).

4. The fauna specialist agrees that the presence of *L. capensis* could indicate the presence of *A. thyra orientis* (one of the SCC species). However, *L. capensis* was not observed within the study area. As per the specialist report, *A. thyra* has a low likelihood of occurrence within the study area.
5. The fauna specialist undertook a field assessment during the butterfly species' flight period, under optimal survey conditions—a sunny, windless day. During the survey, *Chrysoritis brooksi tearei* was recorded on an adjacent property, confirming that the species was active at the time. However, no individuals of this or other sensitive species were observed within the area proposed for development.

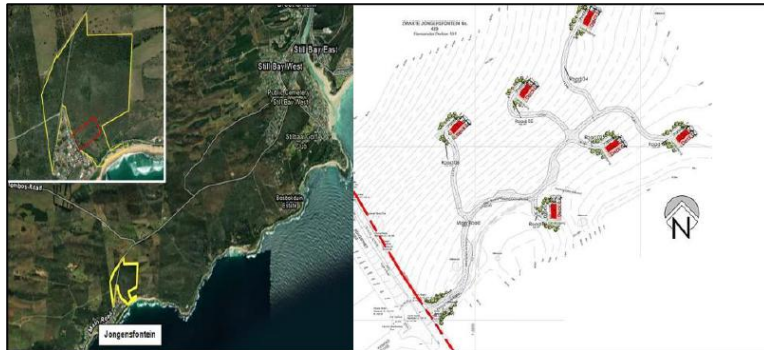
According to the specialist, these species are more likely to occur in the less disturbed portions of the farm, identified on the sensitivity map as areas of high and medium sensitivity. It is therefore recommended that the glamping development be confined to the section classified as low sensitivity, where the likelihood of impacting butterfly populations is minimal.

The property will retain its Agriculture Zone II designation and will not be subject to rezoning.

<p>property and if confirmed, formal conservation to add to the conservation area on Erf 187.</p>	
<p>Aquatic Biodiversity Compliance Statement</p> <ol style="list-style-type: none"> 1. The aquatic biodiversity compliance statement ground-truthed the aquatic features mapped for the site. The seep wetlands mapped along the coastline were confirmed to not support wetland conditions based both on the soils and vegetation present. The vegetation present is dense dune thicket. Two additional drainage lines adjacent to the drainage line indicated in the desktop mapping were identified leading to the coast. The drainage lines were however classified as ephemeral features which do not support riparian or wetland vegetation and are therefore not considered to be watercourses in terms of the National Water Act or NEMA. The proposed development does not encroach on the drainage lines and the impact on aquatic biodiversity is considered to be low. 	<ol style="list-style-type: none"> 1. Noted and confirmed by the Aquatic Specialist.
<p>Services and Spatial Planning</p> <ol style="list-style-type: none"> 1. The existing furrow has been incorporated into the proposed stormwater management for the site. We wish to query the origin of the furrow as it appears to carry stormwater run-off from the adjacent urban area. The stormwater channel which will form part of the development should be appropriately designed from an ecological perspective as compared to the current feature. It is noted that the stormwater will discharge into the central drainage line. 2. The services proposed for the development consist of potable water from an existing borehole and the electricity from solar panels supplemented by gas stoves and geysers. For sewage, each unit will have a small-scale treatment facility which will release effluent of an acceptable quality. It is proposed that the effluent is used either for irrigation or a reserve for fire management (refer to comments above regarding landscaping). The proposed services will therefore have minimal impact and are supported. 3. The property is located outside of the urban edge of the Spatial Development Framework (SDF) for the Hessequa Municipality which is currently in the process of being updated. The proposed development appears to comply 	<ol style="list-style-type: none"> 1. The existing municipal stormwater outlet and channel discharges runoff from Boegspriet Road and Kompas Road. This channel will be formalised as part of this development to ensure that flooding of lower lying residential areas is addressed and avoided. Stormwater measures will be implemented along this existing stormwater channel to ensure that runoff does not cause unwanted erosion within the valley which drains to the coast (noted that the Jongensfontein coastline have experienced damages due to high wave action, especially along the existing gravel road that traverse the subject property in a Easterly direction). The existing municipal stormwater headwall outlet will be extended and positioned outside the main access road to the glamping pods. Stormwater from the existing municipal outlet will continue to be directed via the existing gravel stormwater channel and discharged towards the valley identified by the aquatic specialist. To address existing erosion from this channel, the stormwater outfall into the valley will be equipped with a 3m wide gabion mattress for erosion control 2. Noted. Kindly noted that instead of installing individual/multiple bioreactors (package plants) underneath each pod (as proposed during the Pre-App

with the existing zoning as Agriculture and therefore by interpretation is considered as an acceptable development outside of the urban edge.	<p>process), all sewage will flow to one (1) small conservancy tank that will be emptied by the Municipality or private service provider.</p> <p>3. Noted. Agriculture Zone I indicates that the primary land use is agriculture, with tourist accommodation permitted as a consent use and regarded as acceptable for development outside the urban edge.</p>
<p>Conclusion</p> <p>In conclusion, CapeNature does not object to the proposed development, however the following must first be addressed:</p> <ul style="list-style-type: none"> • Clarification must be provided regarding the mapping of the habitats present on site in relation to the two revisions of the SA VegMap and the mapping of the terrestrial biodiversity assessment and the animal species compliance statement. • The footprints of the pods should be ground-truthed to ensure that plant SCCs are avoided as far as possible. • A fire management plan should be developed for the property and included as part of the application. • CapeNature can be consulted regarding the conservation of the remainder of the property, particularly with regards to the potential presence of the populations of endangered butterflies on site. <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	<p>Noted. Kindly refer to the above responses.</p>
<p>Melanie Koen (Department of Forestry, Fisheries & the Environment; Area Manager Forestry: Western Cape) 30 September 2024</p>	
<p>Comments</p>	<p>Response</p>
<p>Forestry studied the supporting documents for the above-mentioned application and the following points related to Forestry's mandate i.e. the implementation of the NFA is applicable:</p> <ol style="list-style-type: none"> 1. According to the report the: "property is approximately 61ha in size and located immediately adjacent to- and bordering the Eastern border of 	<p>Noted. As per the Pre-App Draft BAR.</p>

Jongensfontein coastal town located approximately 9km south-west of Still Bay via Main Road- The main access to the pods is proposed directly off Boegspriet Road at the intersection with Kompas Close. The Proposal entails: Six (6) x one-bedroom Tourist Accommodation Glamping Pods, $\pm 26\text{m}^2$ enclosed space for each unit. Each with its own: Deck ($\pm 34\text{m}^2$), Carport ($\pm 18\text{m}^2$), Water Tank, Underground Sewage Bioreactor, Limited Landscaped Area that must also serve as a fire break, Total Built and Parking Area: $\pm 468\text{m}^2$ per pod, Internal Access Roads, Main Gravel Road (Area: $\pm 848\text{m}^2$ Width: $\pm 6\text{m}$), Internal Gravel Roads Area: $\pm 699\text{m}^2$ (extending from the Main Entrance to each Glamping Pod) • Width: $\pm 3\text{m}$ o Amounting to $\pm 1547\text{m}^2$. According to the report: the vegetation on the majority of the farm is consistent with Hartenbos Dune Thicket- The vegetation here follows the description of Hartenbos Dune Thicket, in that milkwood thicket clumps are dispersed within a fynbos matrix on an alluvial substrate- The southernmost section of the site just above the coastline is dominated by milkwood trees (*Sideroxylon inerme inerme*)”



2. Forestry request that the proposed pods be placed in more disturbed areas as not to infringe on the Coastal Forest patches as well as protected trees- and that the proposed layout incorporate the protected trees as well as the coastal forest patches. Protected trees as well as Coastal Forest patches to be retained, be incorporated into the design layout by being GPS'D and indicated as no-go areas.

Milkwood thicket clumps are dispersed on the southern portion of the property where development will not take place.

Although the SDP has been Mitigated to avoid the protected tree species, a Forestry Permit must be obtained should these trees be trimmed or removed for installation of infrastructure (where it cannot be avoided altogether).

3. Indigenous forest as well as protected trees are protected under the National Forest Act (NFA) (Act No. 84 of 1998) as amended.

Noted.

4. Indigenous forest as well as protected trees are protected under the National Forest Act (NFA) (Act No. 84 of 1998) as amended.	Noted.
Dr. Janet Naude (Jongensfontein Ratepayer and JIV member) 30 September 2024	
Comments	Response
<p>1. In the Minutes of an authority meeting on 23 May 2006 regards 'development' on this very same property, organised by Louise-Mari van Zyl when she was with Hilland Associates, Hendrik Visser refers to "the very limited potential for expansion of Jongensfontein, to the eastern side as well The municipality will therefore not accept a planning application where the area falls outside of the urban edge".</p> <p>There is no guarantee that these 6 glamping pods won't increase in number and become the more permanent housing units initially proposed in 2006.</p>	<p>Kindly note that this Environmental Application is for six glamping pods only. The proposed development complies with the existing zoning as Agriculture and therefore by interpretation is considered as an acceptable development outside of the urban edge.</p>
<p>2. Moreover, using water from a borehole so close to seawater and Jongensfontein's only natural Spring, with no expert Impact on Groundwater study from an independent source raises alarm bells.</p>	<p>A borehole study was undertaken to inform this application. Bulk water supply for the proposed development will be sourced from two existing boreholes located on the property—Jongensbaai Beleggings BH1 and BH2. These boreholes have long-term sustainable yields of 43.2 kl/day and 86.4 kl/day respectively, providing a combined yield of 131 kl/day, which is sufficient to meet the development's water requirements.</p> <p>Initial yield testing was conducted in 2006, and a follow-up study was commissioned in 2025 to validate those figures. The recent study confirmed the original yields. Furthermore, chemical analysis indicates that the water quality is suitable for domestic use.</p>
<p>3. The Botanical Biodiversity Impact Assessment once again highlights how underbotanised the area's plantlife is, hence the uncertainty of vegetation types of this CBA 1. Relying on a desktop study and one fieldtrip late October 2023 does not, for example, allow for the unique flowering times of our EN <i>Disa lugens</i> and <i>Moraea tricolor</i> in Autumn, or the DD <i>Apodolirion lanceolatum</i> one day in December in nearby Kompas Street.</p> <p>The dominance of the EN <i>Agathosma muirii</i> and <i>Leucospermum praecox</i> indicates EN Albertinia Sand Fynbos?</p>	<p>Botany/Biodiversity Specialist Response:</p> <p>All three species—EN <i>Moraea tricolor</i>, VU <i>Disa lugens</i>, and DDT <i>Apodolirion lanceolatum</i>—have been assessed as present on Portion 101 / 489, with a High to Very High probability of occurrence.</p> <p>Interestingly, both vegetation type descriptions (EN Albertinia Sand Fynbos & EN Hartenbos Dune Thicket) mention <i>Leucospermum praecox</i> as an important taxon, with Albertinia Sand Fynbos citing it as a dominant species, while <i>Agathosma muirii</i> is mentioned as an important taxon only in the Hartenbos Dune Thicket vegetation type description.</p>

	A detailed vegetation study was undertaken primarily within the proposed development area, where comprehensive field surveys were conducted. Based on this, it is the opinion of the botanical/biodiversity specialist that the vegetation within the study area can be confidently classified as Hartenbos Dune Thicket, characterized by a mosaic of thicket and fynbos elements.
4. So please spare us, the Public, the tedium of having to go through tomes of EACPrac hogwash for quick, short-sighted get-rich-schemes and let the Urban Edge and High Biodiversity Sensitivity speak volumes instead to end this application NOW!	Noted.
Mr. CJ van der Walt (Land-Use Manager: Land Use Management) 29 October 2024	
Comments	Response
1. The western Cape Department of Agriculture does not support six (6) glamping pods, but five (5) as stipulated in the Western Cape Land Use Planning Guidelines for Rural Areas, 2019.	The Hessequa Municipality has confirmed that, in accordance with the Western Cape Land Use Planning Guidelines for Rural Areas, rural properties measuring 50 hectares or more are eligible to apply for up to six additional dwelling units—comprising one permitted in all cases, with up to five further units subject to approval.
2. Please be advised, that this office is a commenting authority and further discussion on your application must be taken up with the decision makers. Further consultation will only be considered when requested by the decision maker.	Noted.
3. Please note: Kindly quote the above-mentioned reference number in any future correspondence in respect of the application. The department reserves the right to revise initial comments and requests further information based on the information received.	Noted.
DD Fortuin (Deputy Director-General: Transport Infrastructure Branch) 7 November 2024	
Comments	Response
1. Your letter HES838/07 dated 27 August 2024 to Interested & Affected Party refers.	Noted.

<p>2. Boegspriet Road, for which Hessequa Municipality is the Road Authority, will (directly) be affected by this proposed development. This Branch, from an environmental point of view, offers no objection to this proposed development, provided that this Branch will be offered the opportunity to issue its comments and approvals during the land use application stage; when the required approvals to construct within the 500m radius Building Restriction (Act 21 of 1940) will be issued by this Branch, the Controlling Authority in terms of the said Act, too.</p>	<p>Noted.</p>
<p>3. Main Road 331 (MR00331) and Minor Road 4841 (OP04841), both roads for which this Branch is the Road Authority, traverse through Farm RE/489/101 - serving the agricultural portions with access. During this Branch's recent reseal of MR00331 has this Branch upgraded acceptable existing accesses along that road, but this Branch has not formalised any access off MR00331 to Farm RE/489/101. An access off MR00331 at ±km7.39 LHS (Left Hand Side) exists, but that access will be closed due to its lack of enough shoulder sight distance to the north-west. Accesses off Boegspriet Road and OP04841 to the agricultural portions must be approved by the respective Road Authorities.</p>	<p>Noted.</p>
<p>4. The proposed 10kl water tank (and associated infrastructure) near MR00331 must be ensured to be outside of the 5m Building Line (Roads Ordinance 19 of 1976) adjacent to that road.</p>	<p>Noted. The proposed 10kl water tank will be located outside the 5m building line.</p>
<p>5. Any advertisement regarding this proposed development that might be visible off the proclaimed provincial road network must carry the required approval in terms of the approved Advertising By-Law of Hessequa Municipality before it may be erected.</p>	<p>Noted.</p>