



Enquiries

A Minne

Contact Details

044 501 3318

E-Mail

aminne@plett.gov.za

File Ref: 18/Erf 10190/ Milkwood Manor/PB

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Attention: Ms L Beets

Tel:

044 873 4923

E-Mail:

luanne@sescs.net

Dear Madam

COMMENT ON PRE-APPLICATION BASIC ASSESSMENT REPORT IN TERMS OF THE NEMA ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS FOR THE PROPOSED EXPANSION OF MILKWOOD MANOR HOUSE AND PARKING ON ERF 10190, REMAINDER OF ERF 2066 AND REMAINDER OF ERF 706, PLETTENBERG BAY

DEAD&P Reference Number: 16/3/3/6/7/1/D1/14/0217/24

Bitou Local Municipality would like to thank you for the opportunity to review and comment on the Pre-Application BAR for the proposed development on the Erf 10190, Remainder of Erf 2066 and Remainder of Erf 706 within the Bitou Municipal area. Please note that these comments have been drafted by the Land Use and Environmental Management department within the Planning and Development directorate. Additional comments may be required from other relevant departments within the Bitou Local Municipality.

The following information was taken from the supplied report and summarise the proposed activities.

DESCRIPTION OF ACTIVITY

It is proposed to expand the existing Milkwood Manor through the addition of new rooms, a store and a spa increasing the total ground floor of the building to 1112.07m². An additional 27 parking bays are to be added to the existing public parking as well as various upgrades to the parking area with the addition of ablutions and a shower deck for public use.

LOCATION

The property is situated adjacent to the Keurbooms Estuary at Lookout Beach and contains an existing guesthouse and public and parking facilities.

Following a review of the documentation and appendices the following comments are made:

1. As mentioned within the report the area in question has experienced erosion in the past due to coastal process and the east-west migration of the Keurbooms river mouth. Historically, the area was densely vegetated with what seemed to be Goukamma Dune Thicket. The image below shows the vegetated area in 2004.



Figure 1 – Historical aerial imagery of the area in 2004, Google Earth

2. It is requested that the specialists evaluate, and that the EIA include the active rehabilitation of the dune in front of the parking area (indicated in blue in Figure 2 below). This active rehabilitation should include soft measures such as the use of sand fencing and the planting of appropriate indigenous dune vegetation. This can be included as a Maintenance Management Plan. This active rehabilitation will ensure the stabilisation of the dune and will provide valuable buffer protection to the structures present.



Figure 2 – Aerial Imagery of the Lookout area in 2022, Google Earth.

3. The Environmental Management Plan should give direction as to the operational maintenance of the parking area, specifically what should be done with sand that overtops and blows into the parking area.

Sand should be replaced in areas where accretion is required. Please can the coastal engineers provide comment and inputs in this regard.

4. All lighting should be downward facing to limit light pollution.
5. The use of Sustainable Urban Drainage Systems within the parking area is supported.
6. Future maintenance and operations of the proposed shower deck going forward, including removal of sand, should be included in the Environmental Management Programme.
7. Although it is acknowledged that the Coastal Engineers have confirmed that the rock revetment protection measures should be sufficient to protect structures the potentially flooding as a result of overtopping waves during extreme conditions is a concern. Mitigation measures in this regard (raising of floor levels) should be implemented.

The Bitou Municipality reserves the right to revise initial comments and request further information based on any additional information that might be received. The onus remains on the registered property owner to confirm adherence to any relevant legislation with regards to the activities which might trigger and/or need authorisation for.

Should you require any additional information please do not hesitate to contact this office.

Yours faithfully,



Anjé Minne

Environmental Management Officer

Planning and Development: Land Use and Environmental Management

Bitou Municipality