

**REFERENCE:** 14/1/1/E1/9/3/3/0604/19  
**ENQUIRIES:** Aqueel Yasin

**BY EMAIL**

Swarthjiesbaai Trust

[gielie@weskusmail.co.za](mailto:gielie@weskusmail.co.za)

PO BOX 179

LANGEBAAN

7357

Attention: Gielie Visser (in your capacity as a Trustee)

**PRE-COMPLIANCE NOTICE**

Dear Sir

**INTENTION TO ISSUE A COMPLIANCE NOTICE IN TERMS OF SECTION 31 L  
OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998**

1. During an investigation into allegations of the commencement of a listed activity in contravention of section 24F of the National Environmental Management Act, 1998 ("NEMA"), a site inspection was conducted at Portion 2 of Farm No. 59 Kliphoek, Velddrif, by an Environmental Management Inspector from the Department's Directorate: Environmental Law Enforcement on 21 January 2020, it was confirmed that you have commenced with the

following alleged illegal construction activities (i.e. infilling, structures, buildings, jetty) within 100m of the high water mark and the clearing of indigenous vegetation, without environmental authorisation.



Aerial map: Location of alleged illegal activity.

2. In terms of section 24F of the NEMA, no activity listed in the Environmental Impact Assessment ("EIA") Regulations Listing Notice 1 and 3 of 2014 may commence without environmental authorisation from the competent authority.
3. On considering the evidence before me, there are reasonable grounds to believe that you have commenced the following listed activities without environmental authorisation:

Listing Notice 1 of 2014:

Activity no. 19A:

*The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from—*

- (i) the seashore;*
- (ii) the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or*
- (iii) the sea; —*

*but excluding where such infilling, depositing, dredging, excavation, removal or moving—*

- (f) will occur behind a development setback;*
- (g) is for maintenance purposes undertaken in accordance with a maintenance management plan;*
- (h) falls within the ambit of activity 21 in this Notice, in which case that activity applies;*
- (i) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or*

*where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.*

**AND**

Listing Notice 3 of 2014:

Activity no. 12:

*The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.*

*i. Western Cape*

*i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004*



Photo 1: Area adjacent to the Berg River estuary. Mussel shells dumped.



Photo 2: Area adjacent to the Berg River estuary. Mussel shells dumped. Temporary structure/shelter constructed for day visitors to use.



Photo 3: Camping area. Indigenous vegetation cleared. Mussel shells dumped. Area terraced to create different levels/areas for campers.



Photo 4: Camping area. Indigenous vegetation cleared. Mussel shells dumped. Area terraced to create different levels/areas for campers.

4. In terms of section 49A of the NEMA it is an offence to commence a listed activity without environmental authorisation. A person convicted of such an offence is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and such imprisonment.
5. As such, you are hereby given notice of the Department's intention to issue you with a Compliance Notice in terms of section 31L of the NEMA, which will instruct you to:
  - 5.1 immediately cease the above listed activities;
  - 5.2 investigate, assess and evaluate the impact that the listed activity has / has had on the environment;
  - 5.3 rehabilitate the entire site to its original condition; and
  - 5.4 carry out any other measure necessary to rectify the effects of the unlawful activity.

6. Furthermore, failure to comply with a Compliance Notice is an offence in terms of section 49A(1)(k). A person convicted of failing to comply with a Compliance Notice is liable to a maximum fine of R5 million or 5 years imprisonment or both such fine and such imprisonment.
7. You are afforded a period of **7 (seven) calendar days** from the date of receipt of this Pre-Compliance Notice to make written representations to the Department as to why a Compliance Notice should not be issued.
8. If you inform the Department, in respect of paragraph 7 above that you intend to rectify the non-compliance, **you must cease the above listed activities and submit to the Department for approval, within 30 (thirty) calendar days** of receipt of this Pre-Compliance Notice, a rehabilitation plan compiled by a suitably qualified and experienced independent environmental assessment practitioner, which must include the following:
  - 8.1 assessment and evaluation of the impact on the environment; and
  - 8.2 identification of proposed remedial and/or mitigation measures.
9. If the above plan is approved by the Department, you will be obliged to take the necessary remedial / mitigation measures at your own cost.
10. Approval of the above report by the Department does not remedy the unlawful commencement of the above activity, which remains unlawful in terms of section 49A(1) (a) and/or (d) of the NEMA.
11. If you wish to continue with the listed activity you may apply for environmental authorisation by way of a section 24G application. However, such application does not constitute permission to continue with the listed activity, which remains unlawful unless environmental authorisation is granted.
12. Should you choose to apply in terms of S24G on the NEMA, you must submit to the Department for approval, **within 60 (sixty) calendar days** of receipt of this

Pre-Compliance Notice, a project schedule compiled by a suitably qualified and experience independent environmental assessment practitioner. The project schedule must clearly stipulate the time frames in terms of the s24G process and by when a s24G application will be submitted to the Sub-Directorate: Rectification.

13. Notwithstanding the section 24G application, the Department may issue a Compliance Notice and/or commence criminal proceedings should circumstances so require.



**Achmad Bassier**

**Director: Environmental Law Enforcement**

**Grade 1 Environmental Management Inspector**

**Date: 05/08/2020**

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**REFERENCE:** 14/1/1/E1/9/3/3/0604/19  
**ENQUIRIES:** Aqueel Yasin

Swartjiesbaai Trust

**BY EMAIL**

PO BOX 179

Email: [gielie@weskusmail.co.za](mailto:gielie@weskusmail.co.za)

LANGEBAAAN

7357

Attention: Mr Gielie Visser

## **COMPLIANCE NOTICE**

Dear Sir

**COMPLIANCE NOTICE IN TERMS OF SECTION 31 L OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998**

1. The Department's Pre-Compliance Notice dated 05 August 2020, your representations dated, 10 August 2020, and the Department's Directorate: Environmental Law Enforcement compliance inspection dated 19 November 2020, has reference.
2. Having considered your representations and the evidence before, I, Achmad Bassier, in my capacity as an Environmental Management Inspector Grade 1,

hereby issues Mr Gielie Visser, with a Compliance Notice in terms of section 31L of the National Environmental Management Act, 1998 ("NEMA").

3. This Compliance Notice relates to non-compliance with the provisions of section 24F of the NEMA. No activity listed in the Environmental Impact Assessment ("EIA") Regulations Listing Notice 1 of 2014 may commence without environmental authorisation from the competent authority.

#### Details of conduct constituting non-compliance

4. During an investigation into allegations of the commencement of a listed activity in contravention of section 24F of the NEMA, a site inspection was conducted at Portion 2 of Farm No. 59 Kliphoek, Velddrif by Environmental Management Inspectors from the Department's Directorate: Environmental Law Enforcement on 19 November 2020 and it was confirmed that you have commenced with the development of a camp site and resort facility without the requisite environmental authorisation.



Aerial map: Location of alleged illegal activity.

5. On considering the evidence before me there are reasonable grounds to believe that you have commenced the following activity without environmental authorisation:

EIA Regulations Listing Notice 1 of 2014

Activity no. 19A:

*The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from—*

- (i) the seashore;*
- (ii) the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or*
- (iii) the sea; —*

*but excluding where such infilling, depositing, dredging, excavation, removal or moving—*

- (f) will occur behind a development setback;*
- (g) is for maintenance purposes undertaken in accordance with a maintenance management plan;*
- (h) falls within the ambit of activity 21 in this Notice, in which case that activity applies;*
- (i) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.*



Photo 1: Area adjacent to the Berg River estuary. Mussel shells dumped.



Photo 2: Area adjacent to the Berg River estuary. Mussel shells dumped. Temporary structure/shelter constructed for day visitors to use.



Photo 3: Camping area. Vegetation cleared. Mussel shells dumped. Area terraced to create different levels/areas for campers.



Photo 4: Camping area.

**6. You are hereby instructed to:**

- 6.1 Immediately cease the above listed activity;
- 6.2 submit to the Department within **60 (sixty) calendar days** of receipt of this Compliance Notice a rehabilitation plan compiled by a suitably qualified and experienced independent environmental assessment practitioner, which must include the following:
  - 6.3 assessment and evaluation of the impact on the environment; and
  - identification of proposed remedial and/or mitigation measures.

7. Approval of the plan by the Department does not remedy the unlawful commencement of the above activity, which remain unlawful in terms of section 49A(1) (a) and/or (d) of the NEMA.

8. If the above plan is approved by the Department, you will be obliged to take the necessary remedial / mitigation measures at your own cost.

9. If you wish to continue with the listed activity you may apply for environmental authorisation by way of a section 24G application. However, such application does not constitute permission to continue with the listed activity, which remains unlawful unless environmental authorisation is granted.

10. **Should you choose to apply in terms of S24G on the NEMA, you must submit to the Department for approval, within 60 (sixty) calendar days of receipt of this Pre-Compliance Notice, a project schedule compiled by a suitably qualified and experience independent environmental assessment practitioner. The project schedule must clearly stipulate the time frames in terms of the s24G process and by when a s24G application will be submitted to the Sub-Directorate: Rectification.**

11. Notwithstanding the section 24G application, the Department may commence criminal proceedings should circumstances so require.

#### **Varying this Compliance Notice**

12. If you would like me to vary this Compliance Notice or extend the period to which it relates, you may make representations to me, in writing, to do so.

#### **Failure to comply with this Compliance Notice (section 31N of the NEMA) and related offences in terms of the NEMA**

13. In terms of section 49A(1)(a) of the NEMA it is an offence to commence a listed activity without environmental authorisation. A person convicted of such an offence is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and such imprisonment.
14. Furthermore, failure to comply with a Compliance Notice is an offence in terms of section 49A(1)(k). A person convicted of such an offence is liable to a fine not exceeding R5 million or to imprisonment for a period not exceeding 5 years, and in the case of a second or subsequent conviction to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, and in both instances to both such fine and such imprisonment.
15. Any non-compliance with the Compliance Notice must be reported to the Minister, who may:
  - 15.1 revoke any permit or authorisation to which this Compliance Notice relates; and/or
  - 15.2 take any steps necessary to ensure compliance with the provisions of the law, permit or authorisation to which this Compliance Notice relates and recover from you the cost of doing so.

**Procedure for lodging an objection to this Compliance Notice (section 31L and 31M of the NEMA)**

16. If you wish to lodge an objection to this Compliance Notice, you may do so by making representations, in writing, to the Provincial Minister of Environmental Affairs and Development Planning ("the Minister") within 30 days of receipt of this Compliance Notice.
17. You may also make representations, in writing, to the Minister to suspend the operation of this Compliance Notice pending finalisation of the objection.
18. The objection must be in writing and forwarded to the Appeal Administrator, Mr Marius Venter at the contact details below and must be accompanied by a statement detailing the grounds of the objection and supporting documentation, if any.

By post: Western Cape Ministry of Local Government, Environmental  
Affairs and Development Planning  
  
Private Bag X9186  
  
CAPE TOWN  
  
8000

By facsimile: (021) 483 4174

By hand: Attention: Mr Marius Venter (Tel: 021 483 3721)

Room 809

8th Floor Utilitas Building, 1 Dorp Street, Cape Town, 8001

By email: [DEADP.Appeals@westerncape.gov.za](mailto:DEADP.Appeals@westerncape.gov.za)

19. Irrespective of any representations you may make to me or to the Minister, you must comply with this Compliance Notice within the time period stated in the Compliance Notice, unless the Minister agrees to suspend the operation of this Compliance Notice.



**Achmad Bassier**

**Director: Environmental Law Enforcement**

**Grade 1 Environmental Management Inspector**

**Date: 08/12/2020**

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**TRADE & LEGAL (PTY)LTD**

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West Coast  
South Africa  
7365

[www.tradelegal.co.za](http://www.tradelegal.co.za)

Company Registration 2015/435639/07  
CDC 0100644/17

Member: COMPLIANCE INSTITUTE OF SOUTHERN AFRICA  
CISA; TL2019129326

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2020-08-10  
Directorate; Environmental Law Enforcement  
Private Bag X9086  
Cape Town  
8000

REFERENCE: 14/1/1/E1/9/3/3/0604/19

YOUR; AQUEEL YASIN

OUR; GIELIE VISSER

**WRITTEN REPRESENTATIONS IN TERMS OF SECTION 7 OF THE PRE-COMPLIANCE NOTICE RECEIVED ON  
7 AUGUST 2020**

1. We are assisting Mr Gielie Visser in various matters and have agreed to make written representations on his behalf to the Directorate; Environmental Law Enforcement in terms of Section 7 of the Pre-Compliance Notice
2. The abovementioned Pre-Compliance Notice was received on 7 August and Mr Visser is therefor well within the 7 (seven) calendar days afforded to him to make written representations. We do, however, wish to place on record that the 7 calendar days include a Public Holiday and long weekend. Should we have had more time, the representations would have included more background to the problem
3. In saying that, we wish to, without prejudice, submit that the complainant in this matter has a long history of vexatious complaints against Mr Visser which stems from her objection to Mr Visser renting the land from the family trust. We will, however, show that Mr Visser wish to comply with all environmental issues raised by Mrs Kotze and the Bergriver Municipality, represented by Angila Joubert
4. With regards to **ACTIVITY NO 19A**;
  - 4.1 When Mr Visser concluded the rental agreement with the Trust and occupied the land on 1 August 2019, the portion referred to in Photo 1 and Photo 2 were used by guests of Swartjiesbaai Resort, as well as the public, to fish and camp. The area was littered with bottles, plastic, human waste and debris. The day-campers created their own access road and "reinforced" it with any material imaginable. There were patches of broken concrete, broken

Directors

Leon Terblanche [tradelegal2020@outlook.com](mailto:tradelegal2020@outlook.com) +27 72 415 7997



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bottles, sleeper-wood, stone (stolen from the nearby railway track) as well as areas of old broken mussel shells.



Littering and "self made" roads.

Directors

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- 
- 4.2 After the area was cleared of litter and debris, Mr Visser, brought in 2 bakkie-loads (+- 2 cubic meters) of dried mussel shells to supplement the shells already on the area. He raked the area to distribute the shells evenly and compacted the road by driving a tractor over the existing layer of shells. **Mr Visser denies depositing more than 5 cubic meters of shell, pebbles or grit on the area in question during his tenure**
- 4.3 The area is now neat and clean with no visible littering (see photo)



Directors

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5. With regards to **ACTIVITY 12**;

5.1 The area shown in Photo 3 and Photo 4 of the Pre Compliance Notice was not cleared of indigenous vegetation. The area was, before August 2019, planted with agricultural vegetation namely, Soutbos (Old man saltbush (*Atriplex nummularia*) to use as grazing for sheep. This was removed and the sand protected with fishing net until a new indigenous ground cover namely, Suurvy, *Carpobrotus edulis*, can be established.



5.2 Mr Visser **denies that he cleared the area of indigenous vegetation** other than the agricultural plantings of the Soutbos, which he has legally removed.

5.3 To further protect the area against wind erosion, Mr Visser planted +- 100 trees. These trees are mostly Rooi Essenhout (*Trichilia emetica*) and Beefwood (*Casuarina cunninghamiana*). The trees are watered and tended to by Mr Visser and shows his determination to protect rather than destroy the environment.



Directors

Leon Terblanche [tradelegal2020@outlook.com](mailto:tradelegal2020@outlook.com) +27 72 415 7997



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6. As is clear from Mr Visser's written representations, he is deeply committed to a healthy and environmentally friendly partnership with nature and will, at his own cost, remove the dried mussel shells from the area, although he strongly denies that he placed more than 5 cubic meters of the shell on the premises. The removal of the Soutbos does not, in our opinion, constitute a non-compliant activity and his establishment of Suurvy and trees should be lauded rather than be ignored.
7. As Mr Visser's activity does not, in our opinion, constitute an unlawful activity in terms of Sec 49A(1) (a) and/or (d) of the NEMA, we humbly submit that there is no grounds to issue a COMPLIANCE NOTICE in terms of the Act.

---

p.p Gielie Visser

Directors

Leon Terblanche [tradelegal2020@outlook.com](mailto:tradelegal2020@outlook.com) +27 72 415 7997

**REFERENCE:** 14/1/1/E1/9/3/3/0604/19

**ENQUIRIES:** Aqueel Yasin

Swartjiesbaai Trust  
PO BOX 179  
LANGEBAAAN  
7357

**BY EMAIL**

Email: [gielie@weskusmail.co.za](mailto:gielie@weskusmail.co.za)

Attention: Gielie Visser

Dear Sir

**RE: REPRESENTATIONS MADE IN RESPONSE TO THE NOTICE OF AN INTENTION TO ISSUE A COMPLIANCE NOTICE UNDER SECTION 31(L) OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 107 OF 1988**

1. Your letter dated and received by the Department's Directorate: Environmental Law Enforcement ("this Directorate") on 10 August 2020, refers.
2. This Directorate is cognisant of the fact that KnorVarkie, represented by you, was unaware of the legal requirements that should have been met prior to the undertaking of the said development and that you have conducted a cleaned-up and maintained the area for the betterment and enjoyment of the public.
3. In response to your assertion regarding that the Department hinder or obstructs economic development and social upliftment, it is thus unsubstantiated and refuted, as the Department is one of the key stakeholders within the Western Cape Province to ensure sustainable economic growth and development, without compromising the future of our unique natural environment.

4. That being said, it is imperative that developments of this nature, follows the required environmental impact assessment process, prior to undertaking of such a development/activity.
5. Furthermore, after considering your representations, this Directorate is in agreement that less than 5 cubic meters of mussel shells were dumped on the property and that no indigenous vegetation had been cleared as the area was primarily overgrown with a plant species known as "Old man saltbush (*Atriplex nummularia*)".
6. However, it has been established that more than 5 cubic meters of material has been moved to create a terraced cut and to fill an embankment area which will be used as a camping site/caravan park area. As such, you have unlawfully commenced with a listed activity without obtaining prior Environmental Authorisation from the Competent Authority (i.e. this Department).
7. In light of the above, you are hereby issued with a Compliance Notice in terms of the section 31L of the NEMA, in order to address the unlawful commencement of a listed activity in terms of the NEMA Environmental Impact Assessment Regulations, attached hereto as an annexure.
8. For further queries relating to this correspondence and the Compliance Notice (attached hereto), you may contact the Environmental Management Inspector listed under enquiries.



**Achmad Bassier**  
**Director: Environmental Law Enforcement**  
**Grade 1 Environmental Management Inspector**  
**Date: 08/12/2020**

**REFERENCE:** 14/1/1/E1/9/3/3/0604/19  
**ENQUIRIES:** Aqueel Yasin

Swarjjiesbaai Trust  
PO BOX 179  
LANGEBAAN  
7357

**BY EMAIL**

Email: [gielie@weskusmail.co.za](mailto:gielie@weskusmail.co.za)

Attention: Gielie Visser

**VARIATION OF A COMPLIANCE NOTICE IN TERMS OF SECTION 31L (3) OF  
THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 107 OF 1998  
("NEMA")**

1. The Department's Compliance Notice dated 08 December 2020 and your representation dated and received by the Department on 16 February 2021, have reference.
2. I, Mr Achmad Bassier, in my capacity as an Environmental Management Inspector Grade 1, hereby varies the Compliance Notice issued to Mr Gillie Vissier on 08 December 2020, in terms of section 31L (1) of the National Environmental Management Act, 1998. This variation notice does not replace the previous notice issued, but varies it.
3. After careful consideration of the above representation, **kindly be advised that the section 24G Rectification Process Timeline (PT) as outlined in the project**

schedule submitted by Mr Nicolaas Hanekom on 16 February 2021 is hereby approved by this Directorate.

4. In order to ensure that the section 24G PT in the above representation are implemented correctly and complied with, paragraph 6 of the Compliance Notice is hereby replaced with the following:
  - 4.1 Immediately cease the above listed activities;
  - 4.2 Adhere to the section 24G PT and specified timeframes as stipulated in the project schedule dated 16 February 2021 (attached hereto); and
  - 4.3 Inform the Department of any delays/changes in respect of the section 24G PT on the following details; Ms Zaidah Toefy (Head of Sub-Directorate: Rectification) email: [zaidah.toefy@westerncape.gov.za](mailto:zaidah.toefy@westerncape.gov.za) **and** Mr Aqueel Yasin (Directorate: Environmental Law Enforcement) email: [aqueel.yasin@westerncape.gov.za](mailto:aqueel.yasin@westerncape.gov.za)
5. Approval of the above-mentioned Section 24G project schedule by the Department does not remedy the unlawful commencement of the above activity, which remains unlawful in terms of section 49A(1)(a) and /or (d) of the NEMA.
6. Notwithstanding the section 24G application, the Department may commence criminal proceedings should circumstances so require.



**Achmad Bassier**  
**Director: Environmental Law Enforcement**  
**Grade 1 Environmental Management Inspector**  
**Date: 02/07/2021**

Cc: Mr N Hanekom (Enviro-EAP)

Email: nicolaas@enviro-eap.co.za





24G Application: 14/2/4/2/1/F1/14/0031/24

## SECTION 24G PRE-DIRECTIVE

The Owner  
PO Box 11  
VELDDRIF  
7365

Cel: 082 460 7810  
Email: [charlotte@afrifoodsolutions.co.za](mailto:charlotte@afrifoodsolutions.co.za)

**Attention: Mrs Charlotte Visser**

**PRE-DIRECTIVE IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) ("NEMA"): THE UNLAWFUL ILLEGAL DEVELOPMENT OF KNOR VARKIE CAMP SITE, CARAVAN PARK AND ASSOCIATED FACILITIES ON FARM KLIPHOEK 8/59, VELDDRIF, WESTERN CAPE.**

1. Section 24G of the NEMA provides for the consequences of unlawful commencement, and upon application to the competent authority, applies to any person who has commenced a listed or a specified activity without environmental authorisation in contravention of section 24F(1) of the NEMA.
2. The Department has received your application on 11 September 2024 regarding the unlawful illegal development of Knor Varkie camp site, caravan park and associated facilities on Farm Kliphoek 8/59, Velldrif.
3. Having considered the information in respect of your application, you are hereby given notice of the delegated authority's intention to issue you with a Directive in terms of section 24G of the NEMA (as amended), which will direct you to:
  - 3.1 Compile a report containing a description of the public participation process followed during the course of compiling the application and assessment report, including all

comments received from interested and affected parties and an indication of how the issues raised have been addressed.

4. Kindly be reminded of the NEMA public participation requirements for applications for environmental authorisation:
  - (i) Section 24(1A) and 24(4)(a) of the NEMA stipulate the minimum requirements for applications for environmental authorisation and includes the requirement for public participation to be undertaken.
  - (ii) Please refer to Chapter 6 of the *Environmental Impact Assessment Regulations, 2014* (as amended G.N. No 326 of 7 April 2017) for detail on the public participation process to be followed for applications for environmental authorisation.
  - (iii) In terms of section 24O of the NEMA, the Environmental Assessment Practitioner ("EAP") must consult with every State department that administers a law relating to a matter affecting the environment when an application is considered for an environmental authorisation.
  - (iv) Based on the information contained in the application form, you are advised that the following organs of state / State departments must be included:
    - DEA&DP: Pollution & Chemicals Management
    - DEA&DP: Waste Management
    - Department of Agriculture, Western Cape
    - Heritage Western Cape
    - National Department of Agriculture, Forestry and Fisheries Land Use and Soil Management
    - Berg Rivier Municipality
    - West Coast District Municipality
    - Department of Water and Sanitation
    - DEA&DP Air Quality Management
    - Cape West Coast Biosphere Reserve
5. The application must therefore be made available to registered Interested and Affected Parties (I&APs) and State Departments for a 30-day commenting period.
6. The applicant/Environmental Assessment Practitioner ("EAP") is required to inform this Department, in writing, upon submission of the application to the relevant State Departments.

7. In terms of the public participation process ("PPP") to be undertaken, kindly be advised that you/the EAP must record and respond to all comments received during the public participation process. The comments and responses must be captured in a Comment and Response Report ("C&RR") and must also include a description of the PPP followed.
8. Following the initial 30-day commenting period, the application and the C&RR must be made available to registered I&APs and State Departments for an additional 21-days for review and/or comment, if any, advising them how their issues or concerns have been addressed, before it is submitted to the Department for consideration. Proof of notification of the additional 21-day commenting period must be appended to the final C&RR.
9. Together with a public participation process, that comprises of comments and responses, the section 24G application process includes the issuing and payment of an administrative fine, prior to deciding on the application.
10. Please note that a signed declaration page must be included as part of the s24G application and must therefore be submitted with the final application.
11. The Environmental Management Programme ("EMPr") contents must meet the requirements outlined in Section 24N (2) & (3) of the NEMA (as amended) and Appendix 4 of the NEMA EIA Regulations, 2014 (as amended). The EMPr must address the environmental impacts of the activity throughout the development life cycle including an auditing protocol for the assessment of the effectiveness of monitoring and management arrangements after implementation.
12. The EAP must ensure that the section 24G application be submitted as a standalone document, separate to the accompanying appendices, and that each of the appendices is saved separately (in PDF format) and not scanned / merged into a single document.
13. Reports must be submitted via email to the case officer, with attached pdf versions of the report or, if too large to attach to an email, to be made available via an electronic link provided in the email that is accessible by the Directorate: Environmental Governance. The Directorate may require that a hard copy of the reports also be submitted to the Department by a certain date but will advise you accordingly.

14. In addition to any representations made in the application, you are afforded a period of **7 (seven) calendar days** from the date of receipt of this Pre-directive to make written representations to the Department as to why a Directive should not be issued.
15. Please note that if you fail to comply with a Directive, you will have committed a criminal offence in terms of 49A(1)(g) of the NEMA.
16. In addition, section 49B of the NEMA stipulates that a person convicted of an offence in terms of section 49A(1)(g) is liable to a fine not exceeding R10 million, or to imprisonment for a period not exceeding 10 years or to both such fine and such imprisonment.
17. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.

**Shafeeq** Digitally signed by  
Shafeeq Mallick  
**Mallick** Date: 2024.10.03  
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**MR SHAFEEQ MALLICK**  
**Head of Rectification (Acting)**  
**ENVIRONMENTAL GOVERNANCE**

CC: (1) Jahmandie Pienaar (Enviro-EAP)  
(2) Bergvliet Municipality  
(3) Aqueel Yasin (DEADP: Environmental Law Enforcement)

Email: [jahmandie@enviro-eap.co.za](mailto:jahmandie@enviro-eap.co.za)  
Email: [beramun@telkomsa.net](mailto:beramun@telkomsa.net)  
Email: [aqueel.yasin@westerncape.gov.za](mailto:aqueel.yasin@westerncape.gov.za)



CONSULTATION REF: 14/2/4/1/F1/14/0026/24

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The Owner  
P.O. Box 11  
**VELDRIFT**  
7365

Email: [charlotte@afrifoodsolutions.co.za](mailto:charlotte@afrifoodsolutions.co.za)

Attention: Charlotte Visser

Dear Sir/Madam

**TO ADVISE ON THE UNLAWFUL DEVELOPMENT OF KNOR VARKIE CAMP SITE, CARAVAN PARK AND ASSOCIATED FACILITIES ON FARM KLIPHOEK 8/59, VELDRIFT**

1. Please be advised that the Section 24G Fine Regulations, 2017 (hereafter referred to as "the fine regulations") require that **public participation be conducted prior to the submission** of an application, as outlined in Regulation 8 of the fine regulations. A section 24G application form must also include the information as set out in **Annexure A of the fine regulations**.
2. You are reminded of the G.N. No. 960 of 5 July 2019: Notice of the Requirement to Submit a Report Generated by the National Web Based Environmental Screening Tool in terms of Section 24(5)(h) of the *National Environmental Management Act, 1998* (Act No. 107 of 1998) and Regulation 16(1)(b)(v) of the Environmental Impact Assessment Regulations, 2014, as amended.
3. Please note that from 04 October 2019 the submission of a Screening Report generated from the National Web Based Environmental Screening Tool is compulsory when submitting an application for environmental authorisation.
4. The Department will consider the information herein and advise you accordingly.
5. Kindly quote the abovementioned reference number in any future correspondence in respect of the pre-application/consultation process.

**Shafeeq**  
**Mallick**

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Shafeeq Mallick  
Date: 2024.10.01  
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**Mr S Mallick**

**Acting Head of Rectification**

**Directorate: Environmental Governance**

CC: (1) Mballi Ntshangase(DEA&DP: Rectification)  
(2) Johmandie Pienaar (EAP)

Email: [Mballi.ntshangase@westerncape.gov.za](mailto:Mballi.ntshangase@westerncape.gov.za)

Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

**24G APPLICATION: 14/2/4/2/1/F1/14/0031/24**

### Receipt of Application Acknowledgement Letter

The Owner  
P.O. Box 11  
**VELDRIFT**  
7365

Email: [charlotte@afrifoodsolutions.co.za](mailto:charlotte@afrifoodsolutions.co.za)

**Attention: Charlotte Visser**

### **ACKNOWLEDGEMENT OF RECEIPT OF THE SECTION 24G APPLICATION: UNLAWFUL DEVELOPMENT OF KNOR VARKIE CAMP SITE, CARAVAN PARK AND ASSOCIATED FACILITIES ON FARM KLIPHOEK 8/59, VELDRIFT**

The documentation received by this Department, is hereby acknowledged.

1. The Department will consider the information in respect of the application and advise you accordingly.
2. Please be advised that in terms of section 24G of the *National Environmental Management Act, 1998* (Act 107 of 1998) ("NEMA") an applicant is required to pay an administrative fine which may not exceed R10 million, prior to a decision being taken on the 24G application.
3. In terms of the Section 24G Fine Regulations 2017, Regulation 6(4) "In the event that the applicant fails to pay the fine within the time period specified in the determination, including any extension thereof in accordance with sub regulation (2)(b), the application shall lapse and partial amounts paid to the competent authority, if any, will not be refunded to the applicant".
4. Please be reminded that it is an offence in terms of Section 49A (1) (a) of the NEMA for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of said activity. A person convicted of an offence is liable to a fine not exceeding R10 million or imprisonment for a period not exceeding ten years, or to both such fine and imprisonment, in terms of Section 49B of NEMA.
5. Kindly quote the abovementioned reference number in any future correspondence in respect of this application

Digitally signed  
by Shafeeq  
Mallick  
**Shafeeq  
Mallick**  
Date: 2024.10.03  
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**Mr Shafeeq Mallick**  
**Acting Head of Rectification**  
**Directorate: Environmental Governance**

CC: (1) Mball Ntshangase (EAP)  
(2) Johmandie Prenaar (EAP)

Email: [Mball.ntshangase@westerncape.gov.za](mailto:Mball.ntshangase@westerncape.gov.za)  
Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)



24G Application: 14/2/4/2/1/F1/14/0031/24

## SECTION 24G PRE-DIRECTIVE

The Owner  
PO Box 11  
VELDDRIF  
7365

Cel: 082 460 7810  
Email: [charlotte@afrifoodsolutions.co.za](mailto:charlotte@afrifoodsolutions.co.za)

**Attention: Mrs Charlotte Visser**

**PRE-DIRECTIVE IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) ("NEMA"): THE UNLAWFUL ILLEGAL DEVELOPMENT OF KNOR VARKIE CAMP SITE, CARAVAN PARK AND ASSOCIATED FACILITIES ON FARM KLIPHOEK 8/59, VELDDRIF, WESTERN CAPE.**

1. Section 24G of the NEMA provides for the consequences of unlawful commencement, and upon application to the competent authority, applies to any person who has commenced a listed or a specified activity without environmental authorisation in contravention of section 24F(1) of the NEMA.
2. The Department has received your application on 11 September 2024 regarding the unlawful illegal development of Knor Varkie camp site, caravan park and associated facilities on Farm Kliphoek 8/59, Velldrif.
3. Having considered the information in respect of your application, you are hereby given notice of the delegated authority's intention to issue you with a Directive in terms of section 24G of the NEMA (as amended), which will direct you to:
  - 3.1 Compile a report containing a description of the public participation process followed during the course of compiling the application and assessment report, including all

comments received from interested and affected parties and an indication of how the issues raised have been addressed.

4. Kindly be reminded of the NEMA public participation requirements for applications for environmental authorisation:
  - (i) Section 24(1A) and 24(4)(a) of the NEMA stipulate the minimum requirements for applications for environmental authorisation and includes the requirement for public participation to be undertaken.
  - (ii) Please refer to Chapter 6 of the *Environmental Impact Assessment Regulations, 2014* (as amended G.N. No 326 of 7 April 2017) for detail on the public participation process to be followed for applications for environmental authorisation.
  - (iii) In terms of section 24O of the NEMA, the Environmental Assessment Practitioner ("EAP") must consult with every State department that administers a law relating to a matter affecting the environment when an application is considered for an environmental authorisation.
  - (iv) Based on the information contained in the application form, you are advised that the following organs of state / State departments must be included:
    - DEA&DP: Pollution & Chemicals Management
    - DEA&DP: Waste Management
    - Department of Agriculture, Western Cape
    - Heritage Western Cape
    - National Department of Agriculture, Forestry and Fisheries Land Use and Soil Management
    - Berg Rivier Municipality
    - West Coast District Municipality
    - Department of Water and Sanitation
    - DEA&DP Air Quality Management
    - Cape West Coast Biosphere Reserve
5. The application must therefore be made available to registered Interested and Affected Parties (I&APs) and State Departments for a 30-day commenting period.
6. The applicant/Environmental Assessment Practitioner ("EAP") is required to inform this Department, in writing, upon submission of the application to the relevant State Departments.

7. In terms of the public participation process ("PPP") to be undertaken, kindly be advised that you/the EAP must record and respond to all comments received during the public participation process. The comments and responses must be captured in a Comment and Response Report ("C&RR") and must also include a description of the PPP followed.
8. Following the initial 30-day commenting period, the application and the C&RR must be made available to registered I&APs and State Departments for an additional 21-days for review and/or comment, if any, advising them how their issues or concerns have been addressed, before it is submitted to the Department for consideration. Proof of notification of the additional 21-day commenting period must be appended to the final C&RR.
9. Together with a public participation process, that comprises of comments and responses, the section 24G application process includes the issuing and payment of an administrative fine, prior to deciding on the application.
10. Please note that a signed declaration page must be included as part of the s24G application and must therefore be submitted with the final application.
11. The Environmental Management Programme ("EMPr") contents must meet the requirements outlined in Section 24N (2) & (3) of the NEMA (as amended) and Appendix 4 of the NEMA EIA Regulations, 2014 (as amended). The EMPr must address the environmental impacts of the activity throughout the development life cycle including an auditing protocol for the assessment of the effectiveness of monitoring and management arrangements after implementation.
12. The EAP must ensure that the section 24G application be submitted as a standalone document, separate to the accompanying appendices, and that each of the appendices is saved separately (in PDF format) and not scanned / merged into a single document.
13. Reports must be submitted via email to the case officer, with attached pdf versions of the report or, if too large to attach to an email, to be made available via an electronic link provided in the email that is accessible by the Directorate: Environmental Governance. The Directorate may require that a hard copy of the reports also be submitted to the Department by a certain date but will advise you accordingly.

14. In addition to any representations made in the application, you are afforded a period of **7 (seven) calendar days** from the date of receipt of this Pre-directive to make written representations to the Department as to why a Directive should not be issued.
15. Please note that if you fail to comply with a Directive, you will have committed a criminal offence in terms of 49A(1)(g) of the NEMA.
16. In addition, section 49B of the NEMA stipulates that a person convicted of an offence in terms of section 49A(1)(g) is liable to a fine not exceeding R10 million, or to imprisonment for a period not exceeding 10 years or to both such fine and such imprisonment.
17. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.

**Shafeeq** Digitally signed by  
**Mallick** Shafeeq Mallick  
Date: 2024.10.03  
13:21:23 +02'00'

**MR SHAFEEQ MALLICK**  
**Head of Rectification (Acting)**  
**ENVIRONMENTAL GOVERNANCE**

CC: (1) Jahmandie Pienaar (Enviro-EAP)  
(2) Bergvliet Municipality  
(3) Aqueel Yasin (DEADP: Environmental Law Enforcement)

Email: [jahmandie@enviro-eap.co.za](mailto:jahmandie@enviro-eap.co.za)  
Email: [beramun@telkomsa.net](mailto:beramun@telkomsa.net)  
Email: [aqueel.yasin@westerncape.gov.za](mailto:aqueel.yasin@westerncape.gov.za)

**24G Application: 14/2/4/2/1/F1/14/0031/24**

## SECTION 24G PRE-DIRECTIVE

The Owner  
PO Box 11  
VELDDRIF  
7365

Cel: 082 460 7810  
Email: [charlotte@afrifoodsolutions.co.za](mailto:charlotte@afrifoodsolutions.co.za)

**Attention: Mrs Charlotte Visser**

**PRE-DIRECTIVE IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) ("NEMA"): THE UNLAWFUL ILLEGAL DEVELOPMENT OF KNOR VARKIE CAMP SITE, CARAVAN PARK AND ASSOCIATED FACILITIES ON FARM KLIPHOEK 8/59, VELDDRIF, WESTERN CAPE.**

1. Section 24G of the NEMA provides for the consequences of unlawful commencement, and upon application to the competent authority, applies to any person who has commenced a listed or a specified activity without environmental authorisation in contravention of section 24F(1) of the NEMA.
2. The Department has received your application dated 11 December 2024 regarding the unlawful illegal development of Knor Varkie camp site, caravan park and associated facilities on Farm Kliphoek 8/59, Velddrif.
3. Having considered the information in respect of your application, the application was presented to the 24G Administrative Fines Committee on 21 May 2025. Following review and discussion, the committee concluded that the application has not adequately considered and assessed all the potential impacts associated with the unlawful development and consequences for the intended development on Farm Kliphoek 8/59, Velddrif.
4. In this regard, you are hereby given notice of the delegated authority's intention to issue you with a Directive in terms of Section 24G of the NEMA (as amended), which will direct you to:
  - 4.1 Investigate, evaluate and assess the impact of the activity on the environment;
  - 4.2 Provide such other information or undertake such further studies as the relevant competent authority may deem necessary.

5. You are reminded that a Section 24G application is only relevant to listed activities that has commenced without the pre-requisite environmental authorisation. Only those activities applied for will be considered for authorisation. Therefore, the applicant / EAP is required to ensure that all the applicable listed activities are included in the application to be submitted.
6. Based on the information contained in the Section 24G Application and Assessment Report, the Comments and Response Report ("C&RR") and the discussion of the Administrative Fine Committee, the following was noted:
  - 6.1. While the applicant is presented as a natural person, the entity "Knor Varkie Laaiplek" is registered as a private business with two Directors. This discrepancy effectively categorises the applicant as a Category 1 offender in terms of Regulation 4 of the Section 24G Fine Regulations, 2017. Furthermore, the report fails to provide any substantiated personal circumstances or justification that would warrant classifying the applicant as an individual rather than a firm.
  - 6.2. Section D: Needs and Desirability has been inadequately and insufficiently assessed. The assessment fails to provide compelling justification for the development in terms of the Spatial Development Framework and Integrated Development Plan. However, mention of the Environmental Management Framework (EMF) is made but does not adequately demonstrate alignment.
  - 6.3. Furthermore, it could not be ascertained whether the Estuary Management Plan for the Berg River have been considered and demonstrated.
  - 6.4. It has also not been adequately addressed and demonstrated whether the development of Knor Varkie camp site, caravan park and associated facilities in keeping with the surrounding environment in terms of the surrounding "sense of place" and / or heritage/ landscape considerations.
  - 6.5. The noise concerns raised are a key impact consideration especially during operation of the open-air bar and restaurant in this type of environment and to adjacent land users. The report fails to adequately address these impact considerations.
7. In light of the above, the Administrative Fines Committee has requested further information regarding the applicant's status (i.e. legal persona), the need and desirability of the unlawful and proposed development, elaboration in terms of sense place as well as concerns related to potential noise impacts and assessment / mitigation thereof.
8. Should the abovementioned be determined as significant change to the report, the following is required:
  - 8.1 The revised Section 24G application must be made available to registered Interested and Affected Parties (I&APs) and State Departments for an additional 30-day commenting period.
  - 8.2 An updated C&RR must be submitted to the Competent Authority for consideration and decision-making.

9. In terms of the PPP to be undertaken, kindly be advised that all comments received during the PPP must be recorded and adequately responded to. The comments and responses must be captured in a C&RR and must also include a description of the PPP followed.
10. Together with a public participation process, that comprises of comments and responses, the Section 24G application process includes the issuing and payment of an administrative fine, prior to deciding on the application.
11. In addition to any representations made in the application, you are afforded a period of 7 (seven) calendar days from the date of receipt of this Pre-directive to make written representations to the Department as to why a Directive should not be issued.
12. Please note that if you fail to comply with a Directive, you will have committed a criminal offence in terms of 49A(1)(g) of the NEMA.
13. In addition, section 49B of the NEMA stipulates that a person convicted of an offence in terms of section 49A(1)(g) is liable to a fine not exceeding R10 million, or to imprisonment for a period not exceeding 10 years or to both such fine and such imprisonment.
14. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.

 Digitally signed by  
Zaidah Toefy  
(53677480)  
Date: 2025.06.04  
13:38:06 +02'00'

**MRS Z TOEFY**  
**HEAD OF RECTIFICATION**  
**DIRECTORATE: ENVIRONMENTAL GOVERNANCE**  
**04 June 2025**

CC: (1) Johmandie Pienaar (Enviro-EAP)

Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)



**Enviro-EAP**  
Environmental Consultants



**PRE-DIRECTIVE REPLY LETTER**

**11 JUNE 2025**

**RECTIFICATION OF THE UNLAWFUL COMMENCEMENT OF LISTED ACTIVITIES W.R.T PORTION 2 OF FARM NO. 59 KLIPHOEK, VELDDRIF FOR THE DEVELOPED CAMP SITE AND RESORT FACILITY WITHOUT THE REQUISITE ENVIRONMENTAL AUTHORISATION. DEA&DP 24G APPLICATION: 14/2/4/2/1/F1/14/0031/24**

**For attention: Mbali Ntshangase  
Department of Environmental Affairs and Development Planning'  
Rectification**

The pre-directive letter as received and dated 4 June 2025 refers. Based on the information contained in the Section 24G Application and Assessment Report, the Comments and Response Report (dated 11 December 2024) and the discussion of the Administrative Fine Committee the following additional information were requested as listed per the items 6.1-6.5 below (numbered in accordance with the pre-directive letter for ease of reference).

Below, as per inputs received from the applicant, is reply to the additional information as requested:

*6. Based on the information contained in the Section 24G Application and Assessment Report, the Comments and Response Report ("C&RR") and the discussion of the Administrative Fine Committee, the following was noted:*

*6.1. While the applicant is presented as a natural person, the entity "Knor Varkie Laaiplek" is registered as a private business with two Directors. This discrepancy effectively categorises the applicant as a Category 1 offender in terms of Regulation 4 of the Section 24G Fine Regulations, 2017. Furthermore, the report fails to provide any substantiated personal circumstances or justification that would warrant classifying the applicant as an individual rather than a firm.*



**Enviro-EAP**  
Environmental Consultants



Reply - As stated in the S24G report the applicant has been leasing the applicable development area on Farm Kliphoek 8/59 since 2019 from the landowner Swartjiesbaai Trust when the Knor Varkie Resort developments was commenced with by the applicant as an individual. The original developments and operation of the Knor Varkie resort developments did not take place under the entity “Knor Varkie Laaiplek” nor is the lease of the development area under “Knor Varkie Laaiplek” but under the individual’s names MJ Visser and Charlotte Visser. Since the developments was commenced with under the individuals name as the lease holder of the applicable area in 2019 it is not clear why the Department is referring to “Knor Varkie Laaiplek” private business as the potential applicant.

*6.2. Section D: Needs and Desirability has been inadequately and insufficiently assessed. The assessment fails to provide compelling justification for the development in terms of the Spatial Development Framework and Integrated Development Plan. However, mention of the Environmental Management Framework (EMF) is made but does not adequately demonstrate alignment.*

Reply – The applicant is in the process of appointing a townplanner to provide additional motivation for justification for the development in terms of the Spatial Development Framework and Integrated Development Plan. Once this motivation has been provided by the townplanner the EAP will forward the motivation to the Department for consideration.

In terms of demonstrating alignment with the Environmental Management Framework the Knor Varkie Development is located within the Conservation Zone of the EMF. This EMZ is based on ensuring the conservation and protection of irreplaceable resources and biodiversity, which are under considerable development pressure. EMZ 1 is applicable in both urban and rural areas. In urban areas, these are areas that may be under pressure, due to their proximity to urban and industrial areas. In the rural settings, the pressures exerted on the resources may not be as severe as within urban and industrial areas. However, the attributes and potential for significant impact are still substantial enough to warrant strict measures for resource use. The Conservation Zone EMZ will also include areas where there is an opportunity for rehabilitation and



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restoration to achieve a functioning state and increase conservation. This is aimed at providing an area for restoration initiatives that can be safeguarded from future development and can contribute to the overall conservation targets for the region. The Conservation Zone EMZ can be compared with the Core 1a and 1b Spatial Planning Category of the SBM's SDF.

Knor Varkie developments must be managed in such a manner that its objectives align with the Zone 1: Conservation Zone management objectives as provided in the EMF which is:

- Promotion of conservation and protection of irreplaceable resources and biodiversity, under significant development pressure.
- Promotion of restoration to ensure protection of resources and continued ecological functioning.
- To ensure protection and conservation of irreplaceable ecosystems and ecological features.
- To ensure sensitive areas are kept intact and in a near natural state.
- To ensure rehabilitation and restoration of ecosystems in less sensitive areas.
- To offset the negative impacts development may render on ecosystems.
- Controlled expansion of sensitive and protected areas to ensure maximum protection of biodiversity.

Therefore, to be in line with objectives as listed above the following must be implemented:

- Restriction of development where it may cause further degradation to ecosystems.
- Maintain ecological functioning of the ecosystem.
- Protect the goods and services, the ecological infrastructure provides (e.g. flood attenuation).
- The restoration of ecosystems and habitats in order to achieve conservation targets.
- Increased conservation and protected biodiversity through establishment of Protected Areas for top priority sites.



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- Increase of restored habitats through conservation initiatives.

Therefore Knor Varkie facilities must not lead to the following:

- No loss of ecosystem functioning to a point where conservation targets (e.g. CBA targets) are compromised.
- Low impact development that results in minimal loss of habitat may be allowed on condition that the ecosystem is not compromised in any way.
- No high impact development should be allowed (in rural areas). Buffers must be allocated and protected.
- No irreversible loss of threatened species that leads to a change in status from Vulnerable to Endangered, or Endangered to Critically Endangered.

Compatible land uses recommended for the Conservation Zone as per the EMF include:

- Conservation (e.g. Environmental education initiatives and community based natural resource projects / conservation initiatives which ensure conservation targets are met).
- Protected Areas and activities compatible with the management plans thereof (e.g. National Parks and reserves).
- Private areas and activities compatible with the management plans thereof (e.g. private nature reserves / an individual's farm which contain sensitive biodiversity).
- Public open areas (with correct zoning).
- Natural Areas
- Touch the Earth lightly eco-tourism projects that result in minimal loss of natural habitat while considerably increasing socio-economic benefit.
- Protected areas and activities compatible with the management plans thereof (expansion of protected areas to ensure protection and conservation of biodiversity).
- Biodiversity offsets.
- Touch the Earth lightly ecotourism that is of an educational or social benefit directly related to the ecological attributes of the area.



**Enviro-EAP**  
Environmental Consultants



As per the estuarine impact assessment conducted with the implementation of the proposed impact and management mitigation measures as included in the EMP it is not expected that the Knor Varkie Camping and Resort Facilities will be a high impact development and therefore it is aligned with the EMF requirements for developments to be considered within the Conservation Zone as it has and will result in minimal loss of natural habitat while considerably increasing socio-economic benefit. As per the findings of the Estuarine Impact Assessment: The primary cumulative impacts for this development are related to loss of and disturbance to estuarine habitat and cumulative effects of increased human activity due to the development of the Resort. The cumulative impacts are expected to be of slightly higher intensity than those assessed for the construction phase but are assessed as low significance with the implementation of suitable mitigation measures. Based on the impacts assessed in the Estuarine Impact Assessment report, it was recommended that the already completed developments identified during the Section 24G Assessment be allowed to remain if the recommendations as provided is implemented. The recommendations as referred to have been included in the EMP requirements for implementation if approved. Additionally, based on the impacts assessed in the Estuarine Impact Assessment, it is recommended that the proposed future development be permitted to proceed with the implementation of strict environmentally responsible practices as outlined in the mitigation measures provided and included in the EMP. However, it is strongly recommended that no additional jetty be built given the presence of *Zostera capensis* beds within the estuary, hence the jetty was removed from the original proposed expansions.

*6.3. Furthermore, it could not be ascertained whether the Estuary Management Plan for the Berg River have been considered and demonstrated.*

**Reply –** The estuarine specialist (Dr Jess Dawson from Anchor Environmental) whom conducted the estuarine impact assessment has been requested to provide a written motivation to confirm and demonstrate how the Berg Rivier Estuary Management plan has been considered in the estuarine impact assessment conducted. Please refer to the letter as attached.

*6.4. It has also not been adequately addressed and demonstrated whether the development of Knor Varkie camp site, caravan park and associated facilities in keeping*



**Enviro-EAP**  
Environmental Consultants



*with the surrounding environment in terms of the surrounding “sense of place” and / or heritage/ landscape considerations.*

Reply - A notification of intent to develop (NID) was submitted for consideration by the Heritage Western Cape (HWC). The HWC confirmed no heritage impact assessment required as it is not believed that the development has impacted on heritage resources. With the implementation of an environmental management programme which will put control, mitigation and management measures in place to prevent and/or mitigate significant negative visual and sense of place impacts of the developments it is not expected that the operation of the Knor Varkie facilities will have a significant negative impact. Transformation of visual land scape from degraded indigenous vegetation to Knor Varkie resort facilities has been assessed under the impact assessment of the S24G report and associated management and mitigation measures included in the EMP. The letter as provided by Dr Jess Dawson (and attached) also refers to how the Berg Rivier Estuary “sense of place” was taken into consideration in the estuarine impact assessment. Should the considerations of the “sense of place” in the report and mitigation measures proposed be deemed not to be acceptable or sufficient by the Department the Department must confirm in what way the “sense of place” was not adequately considered and indicate how the Department requires the “sense of place” to be addressed i.e. a Visual Impact Assessment.

*6.5. The noise concerns raised are a key impact consideration especially during operation of the open-air bar and restaurant in this type of environment and to adjacent land users. The report fails to adequately address these impact considerations.*

Reply - Potential noise impacts have been assessed under the impact assessment of the S24G report and associated management and mitigation measures included in the EMP. Amongst others, requirements that noise levels may not exceed rural maximum noise levels allowed and requirements that noise monitoring must be implemented to ensure that noise levels produced are within allowed rural maximum levels and not causing significant disturbance to surrounding landusers, but to be maintained within the SANS 10103 allowable rural noise limits are included in the EMP. Should the findings of this assessment and mitigation measures proposed be deemed not to be acceptable or sufficient by the Department the Department must confirm whether or not the Department requires that a Noise Impact Assessment be conducted.



**Enviro-EAP**  
Environmental Consultants



We trust the above will be considered by the Department and await further instructions on the way forward.

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



**Enviro-EAP**  
Environmental Consultants



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287



Anchor Environmental Consultants (Pty) Ltd  
8 Steenberg House Silverwood Close  
Tokai 7945, South Africa  
Tel +27 21 701 3420  
Cell+21 84 206 3635  
<https://anchorenvironmental.co.za>  
[jess@anchorenvironmental.co.za](mailto:jess@anchorenvironmental.co.za)

10 June 2025

Johmandie Pienaar  
Environmental Assessment Practitioner  
Enviro-EAP Environmental Consultants  
PO Box 205  
Agulhas  
7287

Dear Johmandie,

**RE: Comments pertaining to the Final S24G Report for the Knor Varkie Resort Development on Farm Kliphoek 8/59**

The following comment was made by DEA&DP regarding the Final S24G Report for Knor Varkie Resort Development on Farm Kliphoek 8/59 (as per the email sent to Anchor regarding the Estuarine Environmental Impact Assessment):

*"It could not be ascertained whether the Estuary Management Plan for the Berg River have been considered and demonstrated."*

Please accept this as Anchor's response to this query. We acknowledge that while the Berg Estuarine Management Plan is not explicitly referenced in the Estuary Impact Assessment document it was reviewed and the assessment of impacts and suggested mitigation methods do nonetheless align with the objectives set out in the Berg Estuary Management Plan as listed below:

1. Maximize long-term economic benefits
2. Conserve biodiversity
3. Ensure harmony among users
4. Improve ecosystem health
5. Retain sense of place
6. Increase awareness

Those with specific relevance to the Estuarine EIA are discussed below:

**Conserve Biodiversity**

Estuaries are the interface of the terrestrial and marine realms. There are many critical processes which take place across both land and sea which impact the estuary and as such an Estuarine Functional Zone (EFZ) has been delimited for all estuaries around South Africa (Van Niekerk et al. 2019). The EFZ aims to not only protect the estuary itself but also the area around the estuary and corresponding processes which contribute to the health of the estuary. The following text is taken from the EIA and demonstrates the alignment of the EIA with Management Objective 2 of the EMP:

Pg 35: "Vegetation acts as a filter, reducing the concentration of contaminants and pollutants, in water passing through the system and improving the quality of water which reaches the estuary. As the Resort is located on the estuarine side of a agricultural land, this vegetation likely plays a critical role in protecting the estuary from harmful chemicals (such as herbicides, which have detrimental impacts on submerged macrophytes (van Wyk et al. 2022)) and excess nutrient runoff from fertilizers that may be employed by the adjacent farm.

Recommendations include the rehabilitation of the salt marsh area, as highlighted in the Draft EMP (Pienaar 2023a), where the temporary caravan is currently situated and in the area adjacent to the car park with suitable estuarine associated species. It is additionally recommended that the applicant rehabilitates the salt bush areas with endemic species, surrounding the developments, to restore lost ecosystem services and promote the proper function of the EFZ.

Beds of *Z. capensis* (a submerged macrophyte) were also observed in the subtidal and intertidal zones of the estuary surrounding the new jetty. *Z. capensis* is listed as an endangered species, and it is likely that the beds were disturbed during the construction of the jetty. This site needs to be monitored to ensure the recovery of the species here, otherwise additional rehabilitation measures will need to be implemented. This needs to be included in the EMP."

#### **Improve ecosystem health**

In addition to the restoration of Salt Marsh areas and conservation of *Z. capensis* beds discussed under Management Objective 2, which will improve ecosystem health by improving water quality, the EIA also aims to conserve the freshwater supply to the estuary. Conserving freshwater supply by removing alien species will improve ecosystem health and therefore aligns with Management Objective 4. This is demonstrated in the following text from the EIA.

Pg 37: "The vegetation within the site is degraded and consists largely of salt bush which was likely planted for livestock grazing in the past (>20 years ago) (Pienaar, 2023). Several invasive species were also observed on the premises, such as *Eucalyptus* sp. and *Wattle* sp. In addition, the developer has planted *Beefwood Casuarina cunninghamiana* and *Rooi Essenhout Trichilia emetica* to act as wind breakers around the camp sites (**Error! Reference source not found.**). *Beefwood*, *Eucalyptus* and *Wattle* are all listed as type 1b) invasive species within riparian zones (Department of Environment Forestry and Fisheries (DEFF) 2020), which means they are prohibited, unless exempted under specific conditions. These trees, in particular use large amounts of water which may impact the functioning of the estuary, as floodplain salt marshes, such as those present in the Berg, depend on groundwater as their major source of water. *Rooi Essenhout* is listed as a category 2 invasive, and it is recommended that a suitable alternative be found, or a permit obtain for the use of this species within this area."

#### **Retain sense of place**

Under Management Object 5, development around the estuary should "be planned to maximise aesthetic and tourism value without compromising the existing sense of the place". The Berg River supports a rich and diverse array of wildlife, especially bird species. It is a nature lover's paradise and while the development is small and camping embodies the nature

loving aspect of the Berg while maximising opportunities for tourism, it is critical that the campsite does not affect the health of the estuary nor compromise on aesthetic quality by allowing littering on site. This is captured in the following excerpt from the EIA;

Pg 38: *“During the site visit, litter was observed on the premises. Given the sensitivity of the area, as it lies within an EFZ which leads to the ocean, and the long break down time of plastics and other litter, it is critical that the premises be cleared immediately and be cleared regularly going forward. In addition, the Resort should have a zero tolerance to litter policy for its staff and Visitors.”*

#### **Increase awareness**

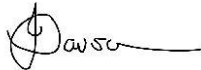
The following excerpt is taken from the EIA (Section 5.1.5) which addresses the effects of increased human activity in the area and highlights how the EIA aligns with Management Objective 6 of the Berg EMP

*“Once approved, the applicant is advised to adhere to the Environmental Management Programme as prepared by (Pienaar, 2023a). With regards to 5.1.5 this should include:*

- *Educating users as to the uniqueness of the Berg River Estuary and encouraging Visitors to treat the environment with respect.*
- *Raising awareness of the different species inhabiting the area, especially endangered and vulnerable species.”*

It is our belief that this shows sufficient alignment with the desired outcomes and goals of the Berg Estuary Management Plan. However, please do not hesitate to contact us if you have any further questions.

Kind regards,



Dr Jessica Dawson



DR JESSICA DAWSON  
SENIOR ASSOCIATE

+27 21 701 3420 (tel)  
jess@anchorencvironmental.co.za  
8 Steenberg House, Silverwood Close  
Tokai 7945, South Africa

## References

- Department of Environment Forestry and Fisheries (DEFF) (2020) National Environmental Management: Biodiversity Act, 2004: Alien and Invasive Species Lists, 2020. Gov Gaz 66:31–77.
- Van Niekerk L, Adams JB, Lamberth SJ, Mackay CF, Taljaard S, Turpie JK, Weerts SP, Raimondo DC (2019) South African National Biodiversity Assessment 2018: Technical Report. Volume 3: Estuarine Realm. Pretoria.
- Penaar J (2023a) 1st Draft Environmental Management Programme For Knor Varkie Camping And Caravan Site And Associated Resort Facilities On Portion 8 Of Farm Kliphoek Nr 59, Velddrif. Velddrif.
- Penaar J (2023b) DEA Screening Tool Report and Site Sensitivity Verification Report for Knor Varkie Camp Site and Caravan Park on Portion 8 of Farm Kliphoek no 59 , Velddrif. Velddrif.
- van Wyk JW, Adams JB, von der Heyden S (2022) Conservation implications of herbicides on seagrasses: sublethal glyphosate exposure decreases fitness in the endangered *Zostera capensis*. PeerJ 10:1–22.

**24G Application: 14/2/4/2/1/F1/14/0031/24**

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## **SECTION 24G PRE-DIRECTIVE**

The Owner  
Knor Varkie Caravan Park/Camp Site  
PO Box 11  
VELDDRIF  
7365

Mobile: 082 460 7810

Email: [charlotte@afrifoodsolutions.co.za](mailto:charlotte@afrifoodsolutions.co.za)

**Attention: Mrs Charlotte Visser**

**PRE-DIRECTIVE IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) ("NEMA"): THE UNLAWFUL ILLEGAL DEVELOPMENT OF KNOR VARKIE CAMP SITE, CARAVAN PARK AND ASSOCIATED FACILITIES ON FARM KLIPHOEK 8/59, VELDDRIF.**

1. Section 24G of the NEMA provides for the consequences of unlawful commencement, and upon application to the competent authority, applies to any person who has commenced a listed or a specified activity without environmental authorisation in contravention of section 24F(1) of the NEMA.
2. The application dated 11 December 2024 regarding the unlawful illegal development of Knor Varkie camp site, caravan park and associated facilities on Farm Kliphoek 8/59, Velddrif, ("your application") the Pre-directive dated 04 June 2025 requesting additional information to inform your application and receipt of the additional information dated 11 June 2025 refers.
3. Having considered the information in respect of your application, the application was found to be inadequate for decision-making purposes as it failed to address fundamental issues and concerns for further consideration. The additional information dated 11 June was presented to the Fine Committee on 3 July 2025 and following review and discussion, the committee concluded that the application has adequate information to determine an appropriate administrative fine and for further consideration of the application for decision-making purposes.
4. However, in order for the Department to make an informed decision, a Noise Impact Assessment will be required for the unlawful development on Farm Kliphoek 8/59, Velddrif to address the potential noise-related concerns associated with the development.

5. In this regard, you are hereby given notice of the delegated authority's intention to issue you with a Directive in terms of Section 24G of the NEMA (as amended), which will direct you to:
  - 5.1 Investigate, evaluate and assess the impact of the activity on the environment;
  - 5.2 Provide such other information or undertake such further studies as the relevant competent authority has deemed necessary.
6. You are required to update and revise your application based on the findings of the Noise Impact Assessment and the following public participation is required:
  - 7.1 The revised Section 24G application must be made available to registered Interested and Affected Parties (I&APs) and State Departments for an additional 30-day commenting period.
  - 7.2 An updated Comments & Response Report (C&RR) must be submitted to the Competent Authority for consideration and decision-making.
7. Kindly be reminded that all comments received during the public participation process (PPP) must be recorded and adequately responded to. The comments and responses must be captured in a C&RR and must also include a description of the PPP followed.
8. In addition to any representations made in the application, you are afforded a period of 7 (seven) calendar days from the date of receipt of this Pre-directive to make written representations to the Department as to why a Directive should not be issued.
9. Please note that if you fail to comply with a Directive, you will have committed a criminal offence in terms of 49A(1)(g) of the NEMA.
10. In addition, section 49B of the NEMA stipulates that a person convicted of an offence in terms of section 49A(1)(g) is liable to a fine not exceeding R10 million, or to imprisonment for a period not exceeding 10 years or to both such fine and such imprisonment.
11. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.



Zaidah  
Toefy  
(53677480)

Digitally signed by  
Zaidah Toefy  
(53677480)  
Date: 2025.07.28  
09:55:29 +0200

**MRS Z TOEFY**  
**HEAD OF RECTIFICATION**  
**DIRECTORATE: ENVIRONMENTAL GOVERNANCE**  
**28 July 2025**

CC: (1) Johmandie Pienaar (Enviro-EAP)

Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)



**Enviro-EAP**  
Environmental Consultants



**1 August 2025**

**PRE-DIRECTIVE REQUEST FOR SPECIALIST REPLY LETTER**

**RECTIFICATION OF THE UNLAWFUL COMMENCEMENT OF LISTED ACTIVITIES W.R.T PORTION 2 OF FARM NO. 59 KLIPHOEK, VELDDRIF FOR THE DEVELOPED CAMP SITE AND RESORT FACILITY WITHOUT THE REQUISITE ENVIRONMENTAL AUTHORISATION. DEA&DP 24G APPLICATION: 14/2/4/2/1/F1/14/0031/24**

**For attention: Mbali Ntshangase**

**Department of Environmental Affairs and Development Planning' Rectification**

The application dated 11 December 2024 regarding the unlawful illegal development of Knor Varkie camp site, caravan park and associated facilities on Farm Kliphoek 8/59, Velddrif; the Pre-directive dated 04 June 2025 requesting additional information to inform the application and receipt; additional information dated 11 June 2025 as provided; and the pre-directive letter as received and dated 28 August 2025 refers.

In accordance with the information requested the applicant intends to implement the following requirements in order for the Department to make an informed decision:

- As per the information presented in the additional information provided and dated 11 June 2025, *the applicant will appoint a townplanner to provide additional motivation for justification for the development in terms of the integration with the municipal Spatial Development Framework and Integrated Development Plan requirements.*
- *The applicant will appoint a noise specialist to conduct a Noise Impact Assessment to address the potential noise-related concerns associated with the development.*
- *Following the outcomes of the townplanner motivation and Noise Impact Assessment a Revised Section 24G application will be compiled and made available to registered interested and affected parties and State Departments for an additional 30-day commenting period.*



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- *Once the 30-day commenting period as mentioned has been concluded an updated Comments & Response Report will be submitted to the Competent Authority for consideration and decision-making.*

*Expected timeline for completion of the steps as mentioned above – Depending on the specialist appointments to be made and specialist studies completion dates (still to be provided by specialist) it is not possible to provide the Department with expected completion dates as this stage however the applicant endeavours to complete the steps as mentioned above within three months from the date of this letter. If due to specialist unavailability etc. it is not possible to submit the updated Comments and Response Report within the three-month period, the applicant will provide the Department with a monthly expected timeline update on progress made.*

We trust that the above will be considered favourably by the Department.

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



**Enviro-EAP**  
Environmental Consultants



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

**24G Application: 14/2/4/2/1/F1/14/0031/24**

---

#### **ACKNOWLEDGEMENT OF RECEIPT LETTER**

The Owner  
Knor Varkie Camp  
PO Box 11  
VELDDRIF  
7365

Email: [charlotte@afrifoodsolutions.co.za](mailto:charlotte@afrifoodsolutions.co.za)

Cel: 082 460 7810

**Attention: Mrs Charlotte Visser**

#### **THE 24G APPLICATION FOR THE UNLAWFUL DEVELOPMENT OF KNOR VARKIE CAMP SITE, CARAVAN PARK AND ASSOCIATED FACILITIES ON FARM KLIPHOEK 8/59, VELDDRIF - ACKNOWLEDGEMENT OF RECEIPT OF REPRESENTATION TO THE 2<sup>nd</sup> PRE-DIRECTIVE REQUESTING SPECIALIST STUDIES DATED 28 JULY 2025.**

1. The Pre-Directive dated 28 July 2025 and letter of representations dated 01 August 2025 from your appointed Environmental Assessment Practitioner, Enviro-EAP, as received by this Department on same day has reference.
2. This letter serves as an acknowledgement of receipt of the letter of representations dated 01 August 2025.
3. The letter dated 01 August 2025 indicates that you intend to implement the following:
  - 3.1 To appoint a town planner to provide additional motivation for justification for the development in terms of the integration with the municipal Spatial Development Framework and Integrated Development Plan requirements.
  - 3.2 To appoint a noise specialist to conduct a Noise Impact Assessment to address the potential noise-related concerns associated with the development.
  - 3.3 Following the outcomes of the town planner motivation and Noise Impact Assessment a Revised section 24G application will be compiled and made available to registered interested and affected parties and State Departments for an additional 30-day commenting period.
  - 3.4 Once the 30-day commenting period has been concluded an updated Comments & Response Report will be submitted to this Department for consideration and decision-making.
4. In considering the above and the representations made in your application; you are afforded a period of 3 (three) months from the date of receipt of this letter to submit the revised section 24G application and assessment report.
5. **Please be reminded that in terms of section 24G of the *National Environmental Management Act, 1998 (Act 107 of 1998)* ("NEMA") an applicant is required to pay an administrative fine which may not exceed R5 million, prior to a decision being taken on the 24G application.**

6. In terms of the *Section 24G Fine Regulations 2017, Regulation 6(4)* "In the event that the applicant fails to pay the fine within the time period specified in the determination, including any extension thereof in accordance with subregulation (2)(b), the application shall lapse, and partial amounts paid to the competent authority, if any, will not be refunded to the applicant".
7. Kindly quote the abovementioned reference number in any future correspondence in respect of this application.



**Mrs Z Toefy**

**Head of Rectification**

**Directorate: Environmental Governance**

**04 August 2025**

Zaidah Toefy  
(53677480)  
Digitally signed by  
Zaidah Toefy  
(53677480)  
Date: 2025.08.04  
10:48:30 +02'00'

CC: (1) Johmandie Pienaar (Enviro-EAP)

Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)



**Soundscape Consulting (Pty) Ltd**

Neighbourhood Workspace

58 Main Street, Newlands

Cape Town, 7700

[nicollette@soundscapeconsult.com](mailto:nicollette@soundscapeconsult.com)

14 October 2025

**Johmandie Pienaar**

Environmental Assessment Practitioner

Enviro-EAP Environmental Consultants

+27 72 240 3092

[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

**Motivation for conducting noise measurements during peak season at Knorvarkie Campsite.**

We are scheduled to conduct noise measurements at the Knorvarkie campsite. While initial plans were made to carry out these measurements at an earlier date, we have revised the schedule to align with the site's peak season, which commences around the first week of December.

This adjustment is intentional and necessary to ensure that the measurements accurately reflect the maximum noise levels associated with typical campsite activity. Conducting the survey during peak season allows us to capture a realistic representation of sound emissions under normal operating conditions; particularly when guest occupancy, recreational activities, and vehicular movement are at their highest.

The data collected during this period will provide a more robust representation of potential noise impacts and inform mitigation strategies, if required. It also ensures compliance with best practice guidelines for environmental noise monitoring, which emphasise the importance of measuring during periods of highest activity.

We trust this approach will support the integrity of the environmental assessment and provide reliable data for decision-making.

Please feel free to contact us should you require any further clarification.

Kind regards,

Nicolette von Reiche, Director

**Soundscape Consulting (Pty)**

Reg. no. 2018/516774/07

[www.soundscapeconsult.com](http://www.soundscapeconsult.com)

**From:** Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>

**Sent:** Saturday, October 25, 2025 9:17 AM

**To:** Mbali Ntshangase <[Mbali.Ntshangase@westerncape.gov.za](mailto:Mbali.Ntshangase@westerncape.gov.za)>

**Cc:** Nabeelah Khan <[Nabeelah.Khan@westerncape.gov.za](mailto:Nabeelah.Khan@westerncape.gov.za)>; [jasperhoon@mylan.co.za](mailto:jasperhoon@mylan.co.za); Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Zaidah Toefy <[Zaidah.Toefy@westerncape.gov.za](mailto:Zaidah.Toefy@westerncape.gov.za)>; [charlotte@knorvarkie.co.za](mailto:charlotte@knorvarkie.co.za)

**Subject:** S24G Application Progress Report - 14/2/4/2/1/F1/14/0031/24: THE UNLAWFUL ILLEGAL DEVELOPMENT OF KNOR VARKIE CAMP SITE, CARAVAN PARK AND ASSOCIATED FACILITIES ON FARM KLIPHOEK 8/59, VELDDRIF

Good day Mbali for the Department's consideration the following progress report is presented.

The request for Specialist Study as dated 28/07/2025 received from the Department, Enviro-EAPs reply/representation letter as dated 01/08/2025 and the Department's acknowledgement of receipt of the representation dated 04/08/2025 refers.

In accordance with the information requested the applicant have implemented the following:

- The applicant has appointed a townplanner to provide additional motivation for justification for the development in terms of the integration with the municipal Spatial Development Framework and Integrated Development Plan requirements. Please see attached the *Knor Varkie Townplanner Motivation ito SDF and IDP Integration*.
- The applicant has appointed a noise specialist to conduct a Noise Impact Assessment to address the potential noise-related concerns associated with the development. However as per the specialist letter attached "*Knorvarkie motivation to conduct measurements during peak season*" noise readings are scheduled to be conducted during the first week of December 2025 to ensure that the measurement accurately reflect the maximum noise levels associated with typical campsite activity.

Expected submission date for Revised S24G Report with updated Comments and Response Report:

- The Noise Impact Assessment is therefore only to be completed during December 2025 after which the findings of Noise Impact Assessment Report together with the findings of the Townplanner motivation are to be incorporated into a Revised Section 24G application and made available to registered interested and affected parties and State Departments for an additional 30-day commenting period during January – February 2026.
- Once the 30-day commenting period as mentioned has been concluded an updated Comments & Response Report will be submitted to the Competent Authority for consideration and decision-making.

We trust that the above will be considered favourably by the Department.

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

**From:** Mbali Ntshangase <Mbali.Ntshangase@westerncape.gov.za>

**Sent:** Monday, 27 October 2025 10:25

**To:** Johmandie Pienaar <johmandie@enviro-eap.co.za>

**Cc:** Nabeelah Khan <Nabeelah.Khan@westerncape.gov.za>; jasperhoon@mylan.co.za; Admin <admin@enviro-eap.co.za>; Zaidah Toefy <Zaidah.Toefy@westerncape.gov.za>; charlotte@knorvarkie.co.za

**Subject:** RE: S24G Application Progress Report - 14/2/4/2/1/F1/14/0031/24: THE UNLAWFUL ILLEGAL DEVELOPMENT OF KNOR VARKIE CAMP SITE, CARAVAN PARK AND ASSOCIATED FACILITIES ON FARM KLIPHOEK 8/59, VELDDRIF

Good day Johmandie

I trust that you are well. Thank you for the update regarding this application.

Your email and its contents have been noted and acknowledged.

The expected submission date for the revised Section 24G Report, including the updated Comments and Response Report, is acknowledged.

Kind regards

Mbali Ntshangase

EAPASA registration: 2022/5899

**Environmental Officer (Specialised Production): Rectification**

Department of Environmental Affairs and Development Planning

Western Cape Government

1<sup>st</sup> Floor, Leeusig Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 3696

Email: [Mbali.Ntshangase@westerncape.gov.za](mailto:Mbali.Ntshangase@westerncape.gov.za)

Website: [www.westerncape.gov.za/eadp](http://www.westerncape.gov.za/eadp)



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