



RICHARD SUMMERS INC.
ATTORNEYS

Western Cape Department of Environmental Affairs and
Development Planning
Environmental Planning and Appeals Coordinator
Attention: Mr. Marius Venter

Our ref.: STL25
DEADP ref.: 16/3/3/6/3/05/18/185/25

Per email: DEADP.Appeals@westerncape.gov.za

26 November 2023

Dear Sir/Madam

RE: APPEAL IN TERMS OF SECTION 43 OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT 107 OF 1998 AGAINST THE IMPOSITION OF CONDITIONS FOR THE ADOPTION AND DEFINITION OF A MAINTENANCE MANAGEMENT PLAN FOR THE REMAINDER OF ERF 218, STILL BAY EAST, HESSEQUA MUNICIPAL AREA

[DEADP Reference: 16/3/3/6/3/05/18/185/25]

INTRODUCTION

1. We act for the Stillbaai Oos Duine NPC (Registration No. 2024/239023/08) (the Appellant).
2. This appeal statement contains the appeal by the Appellant against the decision by the Western Cape Department of Environmental Affairs and Development Planning (DEADP) dated 6 November 2023 to adopt and define a Maintenance Management Plan which entails the implementation of a dune maintenance management plan under DEADP reference number 16/3/3/2/A3/20/2046/24 (Maintenance Management Plan). The decision to adopt the Maintenance Management Plan is attached hereto as Annexure A (Decision). The Appellant was notified of the Decision on 6 November 2023. Proof of notification is attached hereto as Annexure B.

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Director: Richard W. Summers Reg No: 2017/536164/21



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Stillbaai Oos Duine NPC / Maintenance Management Plan / NEMA Appeal

3. This appeal is submitted in terms of section 43(1) of the National Environmental Management Act 107 of 1998 (NEMA) and is in compliance with the National Appeal Regulations, 2023, published under NEMA, within 20 days of the date on which the Appellant was notified of the Decision. A copy of the appeal is submitted to interested and affected parties (I&APs) on the same day that it is submitted to the Appeal Authority in accordance with Regulation 4(2) of the National Appeal Regulations, 2023. Proof of notification to I&APs is attached hereto as Annexure C.