

REFERENCE: 16/3/3/1/D2/47/0013/25
DATE OF ISSUE: 06 October 2025

Municipal Manager- George Municipality
% The Director: Civil Engineering Services
PO Box 19
GEORGE
6530

Attention: Mr. Johannes Koegelenberg

E-mail: Jkoegelenberg@george.gov.za

Dear Sir,

COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADING OF STORMWATER INFRASTRUCTURE ROSEMOOR, GEORGE, WESTERN CAPE

1. The abovementioned document Referenced: RSMR/SWI/UP/06/24, compiled by your appointed registered Environmental Assessment Practitioner ("EAP"), Michael Bennett (EAPASA No: 201/3163) as assisted by Candidate EAP, Onela Mhobo (EAPASA No.: 2022/4522) of *Sharples Environmental Services cc*, dated 28 August 2025 and received by this Department on 05 September 2025 refers.
2. This Directorate has reviewed the document and comments as follows:
 - 2.1. The DBAR does not comply with the minimum information requirements set out in Appendix 1 of the Environmental Impact Assessment Regulations, 2014 (Government Notice R982 of 4 December 2014, as amended) ("EIA Regulations") as it does not contain an Environmental Management Programme (EMPr), as required. The EMPr could therefore not be reviewed.
 - 2.2. Kindly note that the contents of the EMPr must meet the requirements outlined in Section 24N (2) and (3) of the NEMA (as amended) and Appendix 4 of GN No. R. 982 of 4 December 2014. The EMPr must address the potential environmental impacts of the activity throughout the project life cycle, including an assessment of the effectiveness of monitoring and management arrangements after implementation (auditing).
 - 2.3. The application form refers to 14 structures, which is different from the 15 structures referred to in the draft BAR. You will therefore need to clarify why these numbers differs. If need be, the application form needs to be amended to reflect what has been assessed in the BAR.
 - 2.4. The coordinates for all fifteen outlet structures are noted, however no coordinates for the site camp and storage areas were included in the draft BAR. Kindly ensure that the final BAR contains coordinates for the site camp and storage area as previously requested in the acknowledgment of the application form.

- 2.5. The BAR notes that it is very likely that the final detailed design will include a combination of all three of the above concepts in order to fulfil on the objectives provided for the project, however, this can only be confirmed once the Topographical Survey is completed and further investigations are completed on site. With this in mind and taking due cognisance of the identified possible challenges, it must be reiterated that disturbance must be kept to a minimum and the mitigation hierarchy must be strictly applied and implemented when the final detailed design is determined and implemented.
- 2.6. The draft BAR indicates that, given that all proposed activities fall within a Low Risk class the stormwater upgrades would require a General Authorisation as opposed to a comprehensive water use licence. This must be confirmed in writing by the Breede Olifants Catchment Management Agency (BOCMA) and such confirmation must be submitted to this Directorate as part of the final BAR.
- 2.7. According to the screening tool report, the site contains numerous Critical Biodiversity Areas (CBA), Ecological Support Areas (ESA), plant species of conservation concern as well as animal species of conservation concern. The Terrestrial Biodiversity Impact Assessment however found that the site contains no ecologically significant remaining natural vegetation as the site is almost entirely transformed as the footprint is within a degraded, transformed urban landscape, which will have limited and modified ecological function. It further states that the proposed development will result in an overall improvement to the ecological functioning of the area. Due to the absence of suitable habitat for the identified animal species of conservation concern, it is considered unlikely that these animals are present within the study site. There is also no evidence of any Golden Moles being present and while aquatic habitat is present, it is not deemed suitable due to the high levels of pollution in the watercourse and the disturbed nature of the vegetation. Although this all points to an insignificant impact on terrestrial biodiversity, it is important to ensure that all the identified mitigation measures are included in the Environmental management programme (EMPr) for construction purposes.
- 2.8. In addition to the above, the Terrestrial Biodiversity Impact Assessment also recommends that a weed management programme for implementation after construction have been compiled. In light thereof, you are required to include an alien management plan (to be developed in consultation with the Department of Fisheries Forestry and the Environment: Directorate Biosecurity Services (DFFE)) in the EMPr for the management of weeds after construction to assist in preventing infestation.
- 2.9. In terms of the Aquatic Biodiversity the proposed development will result in a low negative impact during construction with an ensured positive impact during operation as the upgraded stormwater outlets will incorporate energy dissipation and erosion control structures which will result in improved mitigation of stormwater discharge into the Meul River system. The proposed development is therefore considered necessary to improve the wetland habitat below the outlets. All mitigation measures included in the Aquatic Biodiversity Assessment must be included in the EMPr.
3. *Submission of Basic Assessment Report*

The BAR must contain all the information outlined in Appendix 1 of the EIA Regulations, 2014 and must also include and address any information requested in any previous correspondence in respect of this matter.

With regard to paragraph 2.1 above, kindly take note of the requirements of Regulation 43(1) which states that a registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in the EIA Regulations, 2014 and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application.

Please be reminded that in accordance with Regulation 19 of the EIA Regulations, 2014, the Department hereby stipulates that the BAR (which has been subjected to public participation) must be submitted to this Department for decision within **90 days** from the date of receipt of the application by the Department. However, if significant changes have been made or significant new information has been added to the BAR, the applicant/EAP must notify the Department that an additional 50 days (i.e. 140 days from receipt of the application) would be required for the submission of the BAR. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report/additional information.

If the BAR is not submitted within 90 days or 140 days, where an extension is applicable, the application will lapse in terms of Regulation 45 of Government Notice Regulation No. 982 of 4 December 2014 and your file will be closed. Should you wish to pursue the application again, a new application process would have to be initiated. A new Application Form would have to be submitted.

NOTE: Furthermore, in accordance with Environmental Impact Assessment best-practice, you are kindly requested to notify all registered Interested and Affected Parties including the authorities identified in the Public Participation Plan of the submission of the FBAR and to make the document available to them. This will provide such parties an opportunity to review the document and how their issues were addressed. Also note that the final BAR must include a comments and responses report which clearly demonstrate how the inputs received has been addressed and taken into account.

4. Please note that a listed activity may not commence prior to an environmental authorisation being granted by the Department. It is an offence in terms of Section 49A of the National Environmental Management Act, 1998 (Act no. 107 of 1998) ("NEMA") for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity.
5. Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter.
6. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.

Yours Faithfully

Francois Naudé  Digitally signed by Francois Naudé
Date: 2025.10.06 11:14:18 +02'00'

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HEAD OF COMPONENT

ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 3

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

(reference: 16/3/3/1/d2/47/0013/25)

Copied to:

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Reference LE14/2/6/1/6/2/ERF 9000_Linear Infrastructure_
Rosemoore
date 15 October 2025

Sharples Environmental Services cc,
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George,
6530

Attention: Ms Onela Mhobo
By email: onela@sescs.net

Dear Ms Onela Mhobo

**THE DRAFT BASIC ASSESSMENT FOR THE PROPOSED UPGRADING OF
STORMWATER INFRASTRUCTURE IN ROSEMOOR, GEORGE LOCAL
MUNICIPALITY, WESTERN CAPE.**

DEA&DP Reference: I6/3/3/1/D2/47/0013/25

CapeNature would like to thank you for the opportunity to review the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature wishes to make the following comments:

According to the Western Cape Biodiversity Spatial Plan (CapeNature 2024)¹ the repair points have fragments of Critical Biodiversity Areas (CBA 1: Terrestrial). The fine-scale vegetation map describes the vegetation as Wolwedans Grassy Fynbos Thicket (Vlok *et al.*, 2008)². According to the National Biodiversity Assessment (Skowno *et al.*, 2018)³ the vegetation is Garden Route Granite Fynbos which is listed as Critically Endangered (NEM:BA, 2022)⁴.

The proposed stormwater outlets are within the Meul River which has been classified as a Unchannelled Valley Bottom Wetland (Nel *et al.*, 2011)⁵ which is a poorly protected ecosystem (Van Deventer *et al.*, 2019)⁶. CapeNature has reviewed the dBAR and associated specialist assessments. We have the following comments:

¹ CapeNature. 2024. 2023 Western Cape Biodiversity Spatial Plan and Guidelines. Unpublished Report

² Vlok JHJ, Euston-Brown DIW, Wolf T. 2008. A vegetation map for the Garden Route Initiative. Unpublished 1: 50 000 maps and report for C.A.P.E. FSP Task Team, Oudtshoorn.

³ Skowno, A. L., Poole, C. J., Raimondo, D. C., Sink, K. J., Van Deventer, H., Van Niekerk, L., Harris, L. R., Smith-Adao, L. B., Tolley, K. A., Zengeya, T. A., Foden, W. B., Midgley, G. F. and Driver, A. 2019. National Biodiversity Assessment 2018: The status of South Africa's ecosystems and biodiversity. Synthesis Report. Pretoria, South Africa. 214 pp.

⁴ National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004). The Revised National List of Ecosystems that are Threatened and in need of protection. 2022. Government Gazette No. 47526

⁵ Nel, J.L., Murray, K.M., Maherry, A.M., Petersen, C.P., Roux, D.J., Driver, A., Hill, L., Van Deventer, H., Funke, N., Swartz, E.R., Smith-Adao, L.B., Mbona, N., Downsborough, L. & Nienaber, S. (2011). Technical Report for the National Freshwater Ecosystem Priority Areas project. WRC Report No. K5/1801

⁶ Van Deventer, H., van Niekerk, L., Adams, J., Dinala, M.K./ Gangat, R., Lamberth, S.J., Lötter, M., MacKay, F., Nel, J.L., Ramjukadh, C.J., Skowno, A., Weerts, S. 2019. National Wetland Map 5-An Improved Spatial Extent and representation of inland aquatic and estuarine ecosystems in South Africa.

1. The surrounding area has been transformed by residential development, and the remaining natural vegetation is severely degraded.
2. The stormwater upgrade follows a severe flooding event. It is recommended that construction takes place during the drier months to minimise the risk of erosion and sedimentation.
3. The removal of pipes located within the watercourse must be conducted manually (i.e., by hand) to avoid further ecological degradation.
4. Eradication of invasive alien plant species are of high priority. Alien plant species that occur outside of the proposed footprint must be cleared during the alien clearing phase. In this way, more alien plant species can be removed. The eradication and monitoring of the spread of invasive alien species should follow the National Environmental Management: Biodiversity Act (Act No.10 of 2004)⁷.
5. All waste and pollutants must be properly removed and managed to minimise environmental impact. Disposal must take place at a registered municipal facility. A waste management plan should be developed for the watercourse, and engagement with the George Municipality is encouraged to support broader river clean-up and awareness initiatives.
6. The recommendations and mitigation measures proposed by the Specialists are supported and must be implemented. The Environmental Control Officer (ECO) must ensure compliance and the protection of remaining ecological processes.
7. Ablution facilities must not be located near the watercourse and must be regularly inspected for leaks to prevent contamination.

In conclusion, CapeNature does not object to the proposed stormwater infrastructure upgrade, as it is not expected to have a significant impact on biodiversity.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely,



Megan Simons
For: Manager (Conservation Intelligence)

⁷ Government Gazette No. 37885, GN No. R. 598 (2014) National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) Alien and Invasive Species Regulations, 2014.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar