

COMMENTS AND RESPONSE REPORT

THE PROPOSED UPGRADING OF STORMWATER INFRASTRUCTURE IN ROSEMOOR, GEORGE, WESTERN CAPE.

Draft BAR COMMENTS			
COMMENT	NAME/ORGANISATION	RESPONSE	#
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.	Francois Naudé Department of Environmental Affairs and Development Planning Directorate: Development Management, Region 3. 09 October 2025	Please see Appendix H of the revised BAR for the EMP.	1
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).		Please see Appendix H of the revised BAR for the EMP.	2
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		All 15 structures have been included in the application form.	3

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amended to reflect what has been assessed in the BAR.

SWO 1	Latitude (S)	33°	58'	9.66"
	Longitude (E)	22°	28'	39.06"
SWO 2	Latitude (S)	33°	58'	25.06"
	Longitude (E)	22°	29'	8.93"
SWO 3	Latitude (S)	33°	58'	28.92"
	Longitude (E)	22°	29'	6.92"
SWO 4	Latitude (S)	33°	58'	35.40"
	Longitude (E)	22°	29'	9.49"
SWO 5	Latitude (S)	33°	58'	42.77"
	Longitude (E)	22°	29'	11.99"
SWO 6	Latitude (S)	33°	58'	44.79"
	Longitude (E)	22°	29'	11.95"

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SWO 7	Latitude (S)	33°	58'	52.96"
	Longitude (E)	22°	28'	57.47"
SWO 8	Latitude (S)	33°	58'	57.57"
	Longitude (E)	22°	28'	53.13"
SWO 9	Latitude (S)	33°	58'	52.55"
	Longitude (E)	22°	28'	45.63"
SWO 10	Latitude (S)	33°	58'	48.43"
	Longitude (E)	22°	28'	39.82"
SWO 11	Latitude (S)	33°	58'	41.77"
	Longitude (E)	22°	28'	36.65"
SWO 12	Latitude (S)	33°	58'	26.86"
	Longitude (E)	22°	28'	30.33"
SWO 13	Latitude (S)	33°	58'	19.57"
	Longitude (E)	22°	28'	29.36"
SWO 14	Latitude (S)	33°	58'	13.67"
	Longitude (E)	22°	28'	35.20"
SWO 15	Latitude (S)	33°	59'	1.82"
	Longitude (E)	22°	29'	1.47"
Site Camp	Latitude (S)	33°	58'	22.95"
	Longitude (E)	22°	28'	53.43"

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

In the revised BAR, the site camp will no longer be included in this proposal. The contractor will have to make use of disturbed areas or areas that don't trigger listed activities as the site camp in draft BAR is not suitable.

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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.		Thank you for the comment, implementation of the EMPr will limit the disturbance during the construction phase. The specialist assessed the worst-case scenario (Which is the biggest structure at each site) and found the proposal to not present any fatal flaws.	5
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		The GA has been approved and will be included in the Revised Draft BAR.	6

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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		Thank you for your comment. This is included in the EMPr.	7

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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 to Fisheries Forestry and the Environment: Directorate Biosecurity Services (DFFE)) in the EMPr for the management of weeds after construction to assist in preventing infestation.		Thank you for the comment. A standard alien management plan will be included in the EMPr. Lauren Josias will be contacted to source an alien clearing plan. Please note the municipal parks department is responsible for alien clearing and will be undertaken by them. If the municipality would like the contractor to undertake alien clearing the attached plan can be used.	8
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		Thank you for your comment. This is included in the EMPr	9

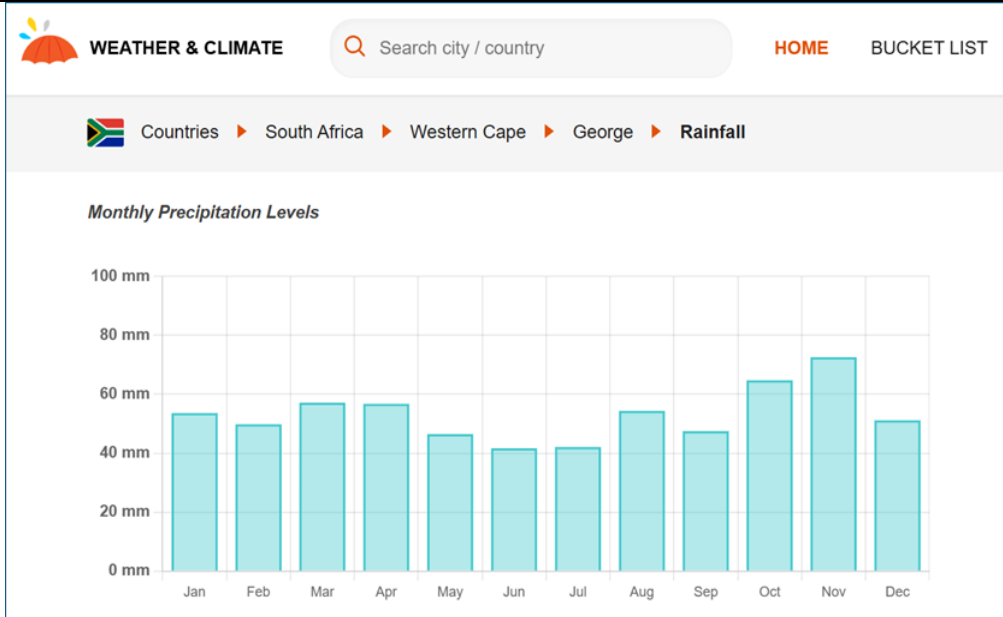
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control structures which will result in improved mitigation of stormwater discharge into the Meul River system. The proposed development is therefore considered necessary to improve the wetland habitat below the outlets. All mitigation measures included in the Aquatic Biodiversity Assessment must be included in the EMPr.			
Comment	Organisation	Response	
1. The surrounding area has been transformed by residential development, and the remaining natural vegetation is severely degraded.	Megan Simons Cape Nature 15 October 2025	This is correct.	10
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.		While in theory this seems like a good idea, this is not practical in George, as the average precipitation is fairly uniform throughout the year, as seen in the figure below. Additionally, the technicalities associated with funding and appointing contractors to undertake the work does not allow for work to be undertaken in such a manner. Mitigation measures are included in the EMPr to mitigate potential erosion during the construction phase.	11

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		 Figure 1: Average Rainfall in George	
3. The removal of pipes located within the watercourse must be conducted manually (i.e., by hand) to avoid further ecological degradation.		This will be done as far as practically possible, however larger pipes will have to be removed by machinery due to their weight and the risk to life removing such large and heavy pipes pose to labourers.	12
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,		A standard alien management plan will be included in the EMPr. Lauren Josias will be contacted to source an alien clearing plan. Please Note the municipal parks department is responsible for alien clearing and will be undertaken by them. If the municipality would like the contractor to undertake alien clearing on their behalf, the attached plan can be used.	13

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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.		The George Municipality appointed Zutari (Pty) Ltd to develop an Integrated River Management Plan (RMP) including a Maintenance Management Plan (MMP) for the Meulen River. Should this RMP be adopted, the waste management strategies included in the MMP will be implemented. A standard waste management plan is included in the EMP and will be monitored by the ECO to ensure the construction related waste and rubble is removed from sites. The George Municipality regularly undertakes clean up campaigns, battling waste and litter is an ongoing struggle.	14
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.		All the specialist recommendations have been included in the EMP for implementation. This is included in section 14.3 of the EMP.	15
7. Ablution facilities must not be located near the		Thank you for the comment. This is included in section 7.3.6 of the EMP.	16



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watercourse and must be regularly inspected for leaks to prevent contamination.			
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