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**OFFICE OF THE MUNICIPAL MANAGER**

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Enquiries: Dr NS Viljoen  
Reference: 18/2/4/R  
Date: 01 December 2025

Attention: Ms Jessica Gossman  
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Cc: GRDM Admin / Records:  
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Dear Madam,

**RE: NOTIFICATION OF THE COMMENCEMENT OF THE 30-DAY PUBLIC PARTICIPATION COMMENTING PERIOD OF THE PROPOSED REMOVAL AND REPLACEMENT OF THE EXISTING ROAD AND CULVERT INFRASTRUCTURE LOCATED ALONG DIVISION ROAD (DR) 1791 KM 1.59, STOPPAD ROAD, CROSSING FARM 501 AND FARM 306 ON PORTION 22 WITTEDRIFT, BITOU LOCAL MUNICIPALITY, GARDEN ROUTE DISTRICT MUNICIPALITY (DEADP REF NO: 16/3/3/6/7/1/D1/14/0099/25).**

The Garden Route District Municipality (GRDM) acknowledge receipt of the Basic Assessment Report (BAR) report prepared by Sharples Environmental Services cc (SES) on behalf of the Western Cape Government Department of Infrastructure, dated 25 October 2025. We would like to thank you for providing the Municipality with the

opportunity to comment on this application. After careful consideration of the report, we wish to provide the following comments and recommendations on the proposed activities:

### **1. Planning and Strategic Context**

The Garden Route District Municipality requires explicit confirmation that the new causeway has been designed for at least the 1:100 year event, with allowance for climate change, and that this was checked against recent flood behaviour in the catchment.

### **2. Watercourse, Hydrology and NWA Aspects**

- The GRDM support the use of GA (21(c) & (i)) in principle, but recommend that:
  - A copy of the DWS GA registration or confirmation letter to be provided prior to construction;
  - A site-specific Method Statement for working in the watercourse, including cofferdam/diversion layout, turbidity control, pump intakes, and dewatering procedure, be developed;
- No stockpiles, refuelling, batching or laydown areas to be placed within 32 m of the top of bank, unless fully bunded and authorised in the EMPr.;
- Quantitative erosion control detail be provided: type, extent and lifespan of apron slabs, energy dissipaters, baffles, and bank protection, to avoid downstream scour.

### **3. Biodiversity, CBA and Riparian Habitat**

- Because the project is inside a CBA and aquatic priority area, the municipality recommends a clear no-net-loss approach to riparian habitat:
  - All areas disturbed by the temporary deviation roads and working platforms must be fully rehabilitated with indigenous riparian species after removal;
  - A site-specific rehabilitation plan must be attached to the EMPr, with plant list, spacing, source of plant material, and a 2–3 year watering and aftercare regime;
- The project presents a good opportunity for alien clearing along at least 100 m upstream and downstream of the crossing as part of the rehabilitation package. This should be formalised as a commitment, not just an opportunity, with performance indicators.
- Monitoring:
  - ECO to confirm pre-construction demarcation and relocation of any salvageable indigenous vegetation as recommended by the specialist.
- Post-construction monitoring at minimum 6-monthly intervals for 3 years is recommended (not just “until fully rehabilitated according to ECO”), with corrective measures where vegetation fails to establish or erosion persists.

### **4. Invasive Alien Species Management**

The BAR acknowledges alien trees (*Acacia mearnsii*), but:

- No long-term alien clearing plan is included;
- No follow-up after construction is specified.

In river systems, if you clear aliens *only where you build*, they regrow more aggressively. The GRDM therefore recommend a 3-year alien clearing and follow-up plan for at least 100 m upstream/downstream.

## 5. Alternatives and Layout Concerns

- The GRDM recommend that a clear preference (environmentally) be made between the upstream and downstream deviation, based on:
  - Extent of riparian clearance;
  - Proximity to sensitive features;
  - Constructability and risk of sediment release;
  - Interaction with existing land uses.
- Please confirm commitment that only one deviation will be constructed (already stated), and that the other alignment may not be developed opportunistically later.
- Please confirm whether a narrower temporary roadway width was considered, as suggested by the aquatic specialist, to further reduce footprint.

## 6. Construction Management and EMPr:

- The GRDM recommend that all specialist recommendations in Section I / specialist table be made legally binding conditions in the EMPr and in the Environmental Authorisation.
- An independent ECO is recommended with:
  - Mandate to stop works in case of non-compliance;
  - Weekly site inspections during in-stream works and monthly inspections otherwise;
  - Monthly compliance reports submitted to DEADP, DWS (if required) and Bitou Municipality.
- Method statements is recommended for at least:
  - Working in the watercourse and managing diversions;
  - Concrete works near water (mixing, washout and curing);
  - Fuel, oil and hazardous substance storage and spill response;
  - Topsoil stripping, storage and reuse;
  - Alien vegetation clearing and disposal;
  - Rehabilitation and planting;
  - All contractors to receive environmental induction training, with attendance registers kept on file.

## 7. Climate Change and Flood Resilience

- The GRDM recommend submission of a short design note from the engineer confirming:
  - Design flood event(s) used (e.g. 1:50, 1:100);

- Climate factor or allowance used for future hydrological change;
- Freeboard assumptions and backwater conditions.
- Please confirm that the causeway will not create upstream impoundment or exacerbate flooding on adjacent private land under design events.
- Please confirm that stormwater roadside drains will not discharge uncontrolled high-velocity flows directly into the watercourse, but will be stabilised and energy-dissipated, as already recommended in the BAR.

## 8. Sediment Control

The BAR says turbidity and sediment must be controlled, but there is no:

- Silt curtain design;
- Cofferdam layout;
- Pump-intake screening;
- Plan for handling wet concrete waste.

These are critical in a riverine environment.

## 9. Heritage or Archaeological Screening

The BAR lists NHRA as requiring comment but:

- No palaeo or heritage field assessment summary is shown;

Causeway replacements often reveal historic structures (stonework, pipes, foundations). Since construction will expose riverbanks and substrate, heritage finds are possible. The GRDM therefore recommend:

- A short HWC comment or letter of no objection
- Chance Finds Procedure included in EMPr.

## 10. Emergency Flood Risk During Construction

Temporary works inside a watercourse present huge flood risks. Please elaborate on the following:

- What happens if a flood hits during construction?
- Will the deviation road wash away?
- Could construction material enter the river?
- Where is the flood evacuation plan?

The GRDM recommend a Flood Contingency Plan with:

- Trigger rainfall thresholds;
- Evacuation procedures;
- Measures to secure plant and materials.

## 11. Concluding Remarks and Summary of Recommendations

From a municipal environmental management perspective, the proposed removal and replacement of the existing DR1791 causeway, with associated temporary deviation road and bank protection, is supported in principle, given its role in restoring safe all-weather access, repairing flood damage and improving hydraulic performance. However, the activity is situated within a sensitive watercourse and Critical Biodiversity area, and involves temporary disturbance of riparian habitat.

The municipality therefore recommends that Environmental Authorisation, if granted, be subject to the conditions and enhancements outlined in the comments above, particularly with respect to: (i) registration and compliance with the NWA General Authorisation for Section 21(c) and (i) uses; (ii) strict control of works and diversions within the watercourse; (iii) strengthened rehabilitation, alien clearing and monitoring obligations; (iv) explicit confirmation of flood design criteria and climate-resilient infrastructure design; and (v) HWC confirmation and a Chance Finds Procedure for riverbank excavation.

The comments provided aims to complement the specialist inputs by ensuring practical accountability, policy alignment, and transparent decision-making.

We appreciate the efforts made by Sharples Environmental Services cc and the applicant to ensure responsible and legally compliant development activities.

The Garden Route District Municipality reserves the right to provide comment/s or to amend initial comment/s.

Yours Sincerely



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**MUNICIPAL MANAGER**

**GARDEN ROUTE DISTRICT MUNICIPALITY**

**DATE: 01 December 2025**