

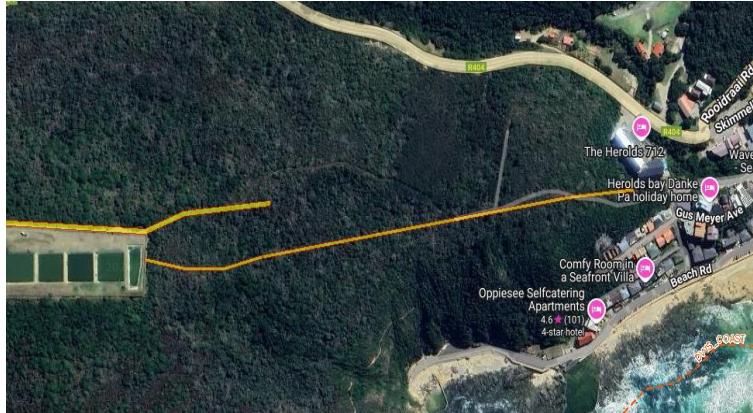
**COMMENTS AND RESPONSE REPORT**

**PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED RISING MAIN AND THE DEVELOPMENT OF NEW ASSOCIATED INFRASTRUCTURE, ON ERF 116, ERF 110, ERF 113, REMAINDER OF ERF 95, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 10, 35 AND 37 OF FARM BRAKFONTEIN NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE**

COMMENT	NAME/ORGANISATION	RESPONSE	#
<p>The abovementioned document received by the Directorate: Development Management (Region 3), hereinafter referred to as "this Directorate" via electronic mail on 18 September 2024 refers.</p> <p>2. This Directorate reviewed the documents and comment as follows:</p> <p>2.1. It is noted from the "Construction of a New Sewage Pumpstation and Rising Main in Herolds Bay, Western Cape, Specialist Aquatic Assessment Dated: 13 May 2024", that the watercourse adjacent to the new pumpstation and rising main is a non-perennial watercourse which has been moderately modified. Please obtain comments from Breede-Olifants Catchment Management Agency to confirm this statement. Furthermore, confirmation from BOCMA is required to confirm the applicability of the National Water Act.</p> <p>2.2. The Botanical Study, Proposed upgrading of the Herold's Bay pump station and sewer pipelines: Dated March 2024. The report indicated that a 30m wide corridor will be required for the installation of the pipelines. Please provide more clarity on the need and desirability of the proposed 30m wide corridor that will be required for the installation and maintenance.</p>	<p>Dorien Werth            Department of Environmental Affairs and Development Planning            7 November 2024</p>	<p>Please refer to comment 15 below.</p>	1
		<p>The exact location of the pipeline is still undetermined. It is a knowledgeable assumption that the existing pipeline is located within the servitude shown in the image below. The existing servitude is 4m in width and insufficient to accommodate the new pipeline which will be placed parallel to the existing pipeline. Accordingly, an additional 4m servitude north to the existing servitude will have to be applied for. The exact location of the pipeline will only be discovered during the construction phase and workers will need a corridor to move around in to search for the pipeline. Additional space next to the pipeline is also needed for labourers and vehicles to work in.</p> <p>The 30m corridor is not the same as the disturbance area of 10m to install the pipe but rather for that 10m disturbance</p>	2

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		<p>area to have the flexibility to shift within the 30m corridor. This is just a precaution in the event that the old data is incorrect and the existing pipe is not located within the servitude.</p>  <p><i>Figure 1: Current Servitude</i></p>
<p>2.3. Further to the above please provide a detailed map for the proposal inclusive of the maintenance road and working footprint.</p>		<p>The road that will be used to access the pipeline will be rehabbed after construction and will not be used for maintenance purposes.</p>
<p>2.4. According to the Botanical report and relevant aerial imagery, which were reviewed by this Directorate, it is noted that the proposed development footprint will be within a Critically Endangered and Endangered Ecosystems, namely Garden Route Granite fynbos and Groot Brak Dune Strandveld.</p> <p>Please obtain comments from Cape Nature on the proposal and include these comments in the Basic Assessment report.</p>		<p>CapeNature have not commented on the Pre-Application BAR after several reminder emails. They are in the I&amp;AP list and will be notified again during the next round of public participation. Every effort has and will be made to obtain comments from CapeNature, however in term of the NEMA EIA Regulation 3(4) states: "When a State department is requested to comment in terms of these Regulations, such State department must submit its comments in writing within 30 days from the date on which it was requested to submit comments and if such State department fails to submit comments within such 30 days, it will be regarded that such State department has no comments."</p>
		<p>3</p> <p>4</p>

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<p>2.5. It is noted that the developed is proposed on a site with steep slopes, please provide a detailed map of the proposed development with the gradient of the site.</p>		<p>Please refer to Figure 3-1 of the Engineering Report.</p> 	5
<p>3. This Directorate awaits the submission of the application for Environmental Authorisation.</p> <p>4. Please note that the activity may not commence prior to an environmental authorisation being granted by this Directorate.</p> <p>5. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any new or revised information received.</p>		<p>This is understood.</p>	6
COMMENT	NAME/ORGANISATION	RESPONSE	
<p>Apologies for the delay in response, we have been out on site. We'll comment during the next phase PPP – please keep us as an I&amp;AP.</p>	<p>Mercia Liddle            Environmental Officer:            Coastal Management            Department of            Environmental Affairs            and Development            Planning</p>	<p>As an applicable authority, you are automatically registered as an I&amp;AP and will be notified during the next round of public participation.</p>	7

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	Western Cape Government 31 October 2024		
COMMENT	NAME/ORGANISATION	RESPONSE	
<p>The matter above has reference.</p> <p>Heritage Western Cape is in receipt of the above matter received. This matter was discussed at the Heritage Officers meeting held on 22 April 2024.</p> <p>You are hereby notified that, since there is no reason to believe that the proposed upgrading of the Herold's Bay Pump Station and Associated Rising Main As Well As The Development Of New Associated Infrastructure, On Re Farm 236 Brakfontein, Farm 10/236 Brakfontein, Re Farm 237, Erf 116, Erf 113, Remainder Of 95, Portion 37 Of Farm 236, Portion 35 Of Farm 236 And Portion 36 Of Farm 236, Herold's Bay, George will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. HWC Chance Find Producer to be included in the environmental authorization.</p> <p>However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay.</p>	<p>Stephanie Barnardt Heritage Western Cape 24 April 2024</p>	<p>Thank you for the confirmation.</p>	8

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<p>This letter does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.</p> <p>HWC reserves the right to request additional information as required.</p> <p>Should you have any further queries, please contact the official above and quote the case number.</p>			
COMMENT	NAME/ORGANISATION	RESPONSE	
<p>The Directorate: Pollution and Chemicals Management (D: PCM) acknowledges receipt of the Draft Basic Assessment Report (DBAR) on 12 September 2024. Please find comment from the D: PCM as follows:</p> <p>1. With reference to pump station 1 (PS1) and associated emergency storage tank and sump, it is mentioned on page 15 of 119 of the DBAR that "All the access points will be covered by removable precast concrete panels or hinged access covers. These covers are designed to minimize the airflow in and out to reduce odour issues. Access manholes will be provided for entry. The access cover will be too heavy for a single person to open and will require mechanical hoisting to reduce the possibility of unplanned entry." In addition to these access points restricting unauthorized access and controlling odour, they should also be designed to restrict seawater ingress during high tides, spring tides or storm surges caused by extreme weather events.</p> <p>2. In addition to the above, the D: PCM recommends that backup generator/s at PS1 also</p>	<p>Gunther Frantz            Department of Environmental Affairs and Development Planning            Directorate: Pollution and Chemicals Management            18 October 2024</p>	<p>Pump station 1 is an existing structure that has withstood storm surges in the past. The proposal will further improve the structure's ability to withstand future storm surges. The existing PS1 is constructed above the high and spring tide marks.</p> <p>Designs in place to further limit seawater ingress into PS1:</p> <ul style="list-style-type: none"> <li>• Double doors</li> <li>• Drainage points for seawater that does find its way into the pump station</li> <li>• Waterproof roof</li> <li>• Manholes and access points will be made watertight as far as reasonably possible</li> </ul> <p>In the event that some seawater does ingress past the above measures, the internals of the facility are waterproof, and the seawater will just be pumped up to the WWTW.</p>	<p>9</p>
		<p>The existing generator at PS1 will be removed and PS4 will have a generator that will supply power and back-up</p>	<p>10</p>

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<p>be protected against extreme ocean tidal or storm surge events, to prevent diesel spillages from generator fuel tanks.</p>		<p>power to both PS1 and PS4, which will mitigate potential spillages.</p>	
<p>3. Where backup generators housing diesel fuel tanks are situated on or next to the beachfront, appropriate design measures (i.e. bunds) should be incorporated to prevent diesel spillages from occurring during re-fueling events. Such measures should be incorporated during the upgrading of PS1.</p>		<p>PS1 will not have a generator. Such measures will be incorporated during the construction of PS4.</p>	11
<p>4. The following general recommendations are provided to prevent and manage the potential contamination emanating from the site during the construction, operational and decommissioning phases and should be incorporated into the Environmental Management Programme (EMPr):</p> <p>4.1. The responsible management of hazardous chemicals should be practiced at all times and storage or handling of chemicals must not take place within close proximity of the beach area/littoral zone.</p> <p>4.2. The refuelling and/or repair of heavy earth moving vehicles should not take place within the beach area and should be conducted within a dedicated impervious area on site.</p> <p>4.3. All heavy earth-moving and transport vehicles must be in good working condition with no leaking hydrocarbon fuel, fluids or lubricant emanating from these vehicles.</p> <p>4.4. The storage of hazardous substances (i.e. petrol, diesel, and lubricants etc.) should be located on impervious bases within bunds (to accommodate</p>		<p>Thank you for the recommendations.</p> <p>4.1 This will be incorporated into the EMPr.</p> <p>4.2 This will be incorporated into the EMPr.</p> <p>4.3 Similar points present in the current EMPr:</p> <ul style="list-style-type: none"> <li>• No machinery or vehicles with leaks are permitted to work in the watercourse;</li> <li>• Excavators and all other machinery and vehicles must be checked for oil and fuel leaks daily. No machinery or vehicles with leaks are permitted to work in the watercourse; No fuel storage, refuelling, vehicle maintenance or vehicle depots to be allowed within 30m of the banks of the watercourse.</li> </ul> <p>4.4 Similar points present in the current EMPr:</p> <ul style="list-style-type: none"> <li>• Storage vessels of hazardous substances must be situated in an impermeable bunded area large enough to accommodate at least 110% of the capacity of the tank in question. If plastic sheeting is used to line the bunded area, care must be taken to ensure it is not punctured in any way during the course of the construction period.</li> <li>• Refuelling and fuel storage areas, and areas used for the servicing or parking of vehicles and machinery, must be located on impervious bases</li> </ul>	12

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<p>110% of the volume) to contain any fugitive spillages and/or leakages.</p> <p>4.5. No discharge of effluents or the wash water from cement batching areas should be allowed to enter the littoral zone/beach area. Runoff must be strictly controlled in the vicinity of any cement batching areas.</p>		<p>and should have bunds around them (sized to contain 110 % of the tank capacity) to contain any possible spills;</p> <p>4.5 Similar point present in the current EMPr:</p> <ul style="list-style-type: none"> <li>• Cement/concrete used in the construction must not be mixed on bare ground or within the watercourse. An impermeable/bunded area must be established in such a way that cement slurry, runoff and cement water will be contained and will not flow into the surrounding environment, the stream or riparian zone or contaminate the soil;</li> </ul>	
<p>Please direct any enquiries to Gunther Frantz should you require clarity on the comments provided.</p> <p>The Department reserves the right to revise or withdraw comments or request further information based on any information received.</p>		<p>Thank you for your comments.</p>	13
COMMENT	NAME/ORGANISATION	RESPONSE	
<p>Reference is made to the above-mentioned Pre-Application Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments.</p> <p>The following are BOCMA comments relation to the Pre-Application Basic Assessment Report for the proposed upgrading of the Herold's Bay sewage pump station and associated rising main, which should be adhered to:</p>	<p>SBONELO NDLOVU            Breede-Olifants            Catchment Agency            4 October 2024</p>	<p>A Water Use License was obtained 5 September 2025.            License number: 01/K30B/I/16508</p>	14
<p>1. The proposed construction of a sewage pump station is located adjacent to a non-perennial stream and rising main crosses the non-perennial stream, a regulated area of a watercourse, thus it triggers water uses in terms of Section 21(c) &amp; (i) of</p>		<p>A Water Use License was obtained 5 September 2025.            License number: 01/K30B/I/16508</p>	15

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<p>the National Water Act, 1998 (Act No. 36 of 1998) and must be authorised. These sections refer to the impeding or diverting the flow of water in a watercourse and altering the bed, banks, course or characteristics of a watercourse respectively. The regulated area of a watercourse is defined as follows:</p> <p>(a) The outer edge of the 1 in 100-year flood line and/or delineated riparian habitat, whichever is the greatest distance, measured from the middle of the watercourse of a river, spring, natural channel, lake or dam;</p> <p>(b) In the absence of a determined 100-year flood line or riparian area the area within 100m from the edge of a watercourse where the edge of the watercourse is the first identifiable annual bank fill flood bench (subject to compliance to section 144 of the Act); or,</p> <p>(c) A 500m radius from the delineated boundary (extent) of any wetland or pan.</p>			
<p>1. The applicant is advised to take all reasonable measures to prevent movement of soil/debris and spillages of raw sewage into the non-perennial stream and estuary from the existing rising main during construction.</p>		<p>The implementation of the EMPr will minimise negative impacts to the non-perennial river and estuary.</p>	16
<p>2. Please note that no water shall be derived from the non-perennial drainage line and used during construction without prior approval by means of water use authorisation in terms of section 22 of the National Water Act, 1998 (Act No. 36 of 1998)</p>		<p>This is understood.</p>	17
<p>3. If there will be storage of oil, diesel, hydraulic fluids and grease onsite used for heavy machinery, it is recommended that the storage</p>		<p>This is understood and mitigated in the EMPr. Please also refer to response 12 for additional information.</p>	18

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<p>areas for these fluids be bunded with cement and is such a manner that any spillages can be contained and reclaimed without causing any pollution.</p>			
<p>4. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151 (1)(a) of the National Water Act. In terms of section 151 (2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such fine and imprisonment.</p>		<p>A Water Use License was obtained 5 September 2025.    License number: 01/K30B/I/16508</p>	19
<p>5. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of the National Water Act that associated with the proposed development.</p>		<p>A Water Use License was obtained 5 September 2025.    License number: 01/K30B/I/16508</p>	20

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<p>6. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.</p> <p>7. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.</p> <p>8. Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at <a href="http://www.dws.gov.za/e-WULAAS">http://www.dws.gov.za/e-WULAAS</a></p> <p>9. Should you have further enquiries the office can be contacted or alternatively contact Mr Si Ndlovu at the above-mentioned contact number or on <a href="mailto:snndluvo@bocma.co.za">snndluvo@bocma.co.za</a></p>		<p>This is understood.</p>	21
<p><b>COMMENT</b></p> <p>Good day</p> <p>Careful consideration and proper public participation is essential before embarking on a project of this scale.</p> <p>A sewerage pump station abutting the brook will threaten water safety with the risk of contamination. Alternative sites in less obtrusive areas have to be explored.</p> <p>Noise is a real threat, and by virtue of its function, so is smell.</p> <p>The scale of the project is huge and intrusive.</p> <p>Nearby property owners face a VERY REAL CONCERN.</p>	<p><b>NAME/ORGANISATION</b></p> <p>Erika Kok [REDACTED]</p> <p>16 October 2024</p>	<p><b>RESPONSE</b></p> <p>We agree proper public consideration is a key component in the EIA process and it is being followed.</p> <p><b>Water safety and risk of contamination</b></p> <p>Please refer to page 96 and 97 of the BAR for a summary of the impacts post-mitigation.</p> <p>Aquatic impacts associated with the construction and operational phase of the pumpstation and rising main can be realistically mitigated to negligible and minor levels of impact significance.</p> <p>Sewerage infrastructure must be maintained and periodically upgraded to ensure functionality and prevent breakdowns. If it is not upgraded and properly maintained sewage will spill into the water course and ocean,</p>	22

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		<p>waterborne diseases (cholera, shigella, hepatitis and dysentery) could be spread due to dysfunctional maintenance, drinkable water could be contaminated, and the sewerage system of Herold's Bay could break down completely resulting in reduction in attractiveness of the bay to tourists (blue flag beach).</p> <p>The Municipality is implementing the project completely to improve the sanitation services provided to the community and to prevent spillage and surcharge into the ocean.</p> <p><b>Alternative sites for PS4</b></p> <p>Alternative sites for PS4 have been investigated by the Municipality and consulting team. Page 61 of the BAR: According to the Engineers, the proposed site for PS4 is the only available space to implement the proposed upgrades to the existing sewerage infrastructure, it has the correct elevation and topography, is not densely vegetated and the closest available property to existing electricity and stormwater infrastructure.</p> <p>The only feasible option that will practically work to avoid multiple pump stations, which is not desirable or a practical solution due to the location and proximity to the beach, was on the current proposed location. In addition, Erf 116 belongs to the Municipality.</p> <p>Reducing the flow to the existing PS1 at the beach is a crucial part of improving the sewage system in Herold's Bay. To achieve this, the diverted flow must be able to gravitate to the new PS4. The current location is the only available site where sewage can gravitate too freely.</p>	
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		<p><b>Noise</b>            The generator will be designed for low noise emission levels, due to pump station proximity within this residential area. It is recommended that noise levels of 60dBA be specified, measured at 7m, as per residential levels specified by the COCT.</p> <p>All designs will be done in accordance with the required regulations in terms of noise. Sound attenuation is being included in the design for generators and mechanical equipment to reduce noise and vibration.</p> <p><b>Odour</b>            All pump stations will be fitted with odour control units. The pump stations are currently fitted with sand traps and screens and no odours are currently being omitted from them, the upsizing of the pump station will not result in new odours emanating. The characteristics of the future sewage are also not changing indicating no "new" smells.</p>	
COMMENT	NAME/ORGANISATION	RESPONSE	
<p>It has come to my attention that the proposal for the new pump station is to be built in Skimmelkrans avenue alongside the river which runs into the sea. This is clearly not a suitable site re the unpleasant smells, the close proximity to residents and the fact that its next to the river.</p> <p>I live at the beach front very close to the existing pump house. This structure has been a disaster for many years i.e. with overflowing sewage into the sea, pumps malfunctioning and an awful stench at times. This has been an ongoing problem for many</p>	Jean Coldrey  15 October 2024	<p>Please refer to the response above regarding odours, proximity to the river and locality of PS4.</p> <p>The municipality is aware and appreciative of the problems occurring at PS1, therefor aspects of this project regarding PS1 includes:</p> <ul style="list-style-type: none"> <li>• Upgrade the existing pump station's civil infrastructure to handle 25L/s (ultimate design flow) and the mechanical operating capacity from 19 L/s to 25 L/s. The average flow under normal circumstances will be 10l/s, therefor the pump</li> </ul>	23

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<p>years. Both the existing structure should be moved, and the new proposed structure should be built out of sight and far from residents and property owners. The camp site has huge open areas or even adjacent to it. But as with everything related to the municipality it must always be the most convenient for them.</p>		<p>station's capacity will be reduced from 19l/s to 10l/s. Meaning that less sewage will be located at PS1.</p> <ul style="list-style-type: none"> <li>• PS1's footprint/catchment is being reduced to only received sewage from the residential area along the beachfront. This will reduce problems experienced at PS1. Majority of the flow will be diverted to the new PS4 which will also be equipped with sufficient equipment to treat and deal sewage.</li> <li>• Refurbish the entire pump station building and equipment, including all mechanical, electrical and electronic equipment. All structures are to be stormproof as far as reasonably possible. Therefor addressing and fixing all current issues.</li> </ul> <p>This design will reduce malodorous activity on the beach front, reduce the risk of spillages onto the beach, and efficient conveyance of sewage from the beach front. Should the pump station not be at the current and newly proposed location, the properties cannot be serviced by a water borne sewer system.</p> <p>Building the sewerage infrastructure out of sight and far from residents is not practical. Sewerage infrastructure exists throughout residential areas and form part of residential suburbs which as in this case requires pump stations. The topography of Herold's Bay does not permit sewerage infrastructure without implementing sewerage pump stations. In order to get sewerage from the lowest point (at the beach) to the WWTW located at the top of the hill above Herold's Bay, a pump station is required. A pump station is therefore the only way to transport the sewage out of the area and will unfortunately be located in close</p>	
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 110, ERF 113, REMAINDER OF ERF 95, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 10, 35 AND 37 OF FARM BRAKFONTEIN  
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		<p>proximity to the residential suburb houses. Without the infrastructure, the sewage network and system cannot function which extends all the way to each toilet in every house. It is not a matter of convenience or inconvenience, but what is practical, the best engineering solution provide the required basic services.</p> <p>PS1, located at the beach, cannot be relocated because the installed sewer reticulation system drains towards it. A conventional gravity sewer reticulation system is installed throughout Herold's Bay, with each house connected to this system, which ultimately drains into PS1. The gravity system conveys sewage to the lowest point, which, in the case of Herold's Bay and most coastal towns, is the beachfront where PS1 is located. The GM is aware of the issues at PS1, and as a result, this project has been initiated to improve the situation.</p> <p>To enhance the sewage system in Herold's Bay, it is essential to reduce the flow to the existing PS1 at the beach. This can be achieved by diverting some of the flow to the new pump station, PS4. PS4 needs to be strategically placed to ensure that sewage can flow into the PS by means of gravity. However, constructing a pump station at the campsite, as suggested, is not feasible because the campsite is situated at a higher elevation and the sewerage would be unable to gravitate into the PS. Therefore, the current location of PS4 remains the only viable site for the effective flow of sewage from the existing reticulation system</p>	
<b>COMMENT</b>	<b>NAME/ORGANISATION</b>	<b>RESPONSE</b>	
Morning Luanne. As an effective party we would like to comment, and we will do so after our meeting	Josheph 15 October 2024	Thank you for meeting with us, the George Municipality and SMEC on the 16 <sup>th</sup> of October 2024.	24

## COMMENTS AND RESPONSE REPORT

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tomorrow with the Municipal and appointed engineer firms representatives on this project.  Regards Joseph			
COMMENT	NAME/ORGANISATION	RESPONSE	
Goeiedag Lu-anne  Baie dankie vir jou nota, waardeer.  As die aandeelhouers van die erwe wat aan Summer Sixteen Pty Ltd / Dr Abel Bezuidenhout behoort, het ons geen negatiewe kommentaar tov die opgradering van die HB riool pompstasie nie en ondersteun die aansoek.	Philip Vermeulen  14 October 2024	Thank you for your comment.	25
COMMENT	NAME/ORGANISATION	RESPONSE	
Dear Luanne- Hope this email finds you well. This email serves to confirm receipt of email on 10/10/24. May you kindly grant extension to somewhere next week please? And also provide the documents including all the necessary appendices please? Kindly note that document will be placed on list for site inspections/ commenting. The Departmental official who will be handling this matter is M. Koen 0609730991 and all communication with regard to this project\ activity should be directed to her. Kindly confirm receipt. Kind regards	Melanie Koen  Department of Forestry and Fishery  14 October 2024	Your requested extension is granted as we will accept your comments and take them into consideration whenever we receive them.  Please also refer to the document sent to you via email on the 15 <sup>th</sup> of October 2024.	26
COMMENT	NAME/ORGANISATION	RESPONSE	
Dear Luanne  SANRAL will not be affected by this development. SANRAL will only be affected if the pipeline crosses a National road	Nicole Abrahams  SANRAL  12 September 2024	Thank you for the confirmation.	27

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COMMENT	NAME/ORGANISATION	RESPONSE	
<p>Objection to the Proposed Construction of a Sewerage Pump Station</p> <p>I am writing to formally object to the proposed construction of a sewerage pump station across the road from my property at [REDACTED], Herold's Bay. My objections are based on the following reasons:</p> <p>1. Environmental Impact: The construction and operation of a sewerage pump station pose significant risks to the local ecosystem, including potential pollution of nearby water sources and disruption of wildlife habitats.</p>	Sharon de Reuck 26 September 2024	<p>Please refer to pages 96 and 97 of the BAR for a summary of the impacts post-mitigation. Please refer to response 14 for potential aquatic pollution risks.</p> <p>Not upgrading the pump stations and sewage system will also pose a significant risk to the local ecosystem.</p> <p>The central section of the pipeline footprint harbours the most intact habitats, intersecting intact Fynbos and Forest/Woodland habitats, with the western section of the pipeline intersecting the existing WWTP and the eastern section largely located within the existing residential area. Collectively, only a small part of the proposed footprint overlaps with intact natural habitats.</p> <p>The project footprint will be of a limited spatial extent and impacts will be of a localised and very short nature and will cease at the end of the construction phase. As such, this renders the entire proposed project footprint as developable from a faunal perspective.</p> <p>The EMPr also mitigates all impacts directly and indirectly relating to fauna on or around the site, such as a faunal and floral search and rescue before construction and rehabilitating the pipeline footprint post construction.</p> <p>Please refer to the Terrestrial Faunal and Avifaunal Species Impact Assessment (Appendix G3) for more information.</p>	28
<p>2. Property Value Concerns: The presence of a sewerage pump station may negatively affect property values in the vicinity, including my own. Prospective buyers often seek to avoid areas with</p>		<p>The pump stations will be visible to the public and are located in high-trafficked areas at the entrance to town and at the beachfront, so it is of the utmost importance that the buildings are not only functional but also aesthetically</p>	29

**COMMENTS AND RESPONSE REPORT**

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<p>such infrastructure due to health and aesthetic concerns.</p>		<p>pleasing. Architectural services have been acquired to enhance the aesthetic look of the new building and ensure it blends in with the existing surroundings of Herold's Bay.</p> <p>The proposed development, once completed, will have a positive impact on people's health and well-being by increasing the resilience of the sewerage infrastructure.</p> <p>The inverse is also applicable, it can enhance the liveability of the area with the upgrade of the sewerage system, the quality of life and prevent/minimise current issues experienced. The improvements made can also attract potential buyers or investors because people are willing to pay more for properties where there are reliable services, creating better living standards.</p>	
<p>3. Health and Safety Risks: Sewerage facilities can produce unpleasant odors and may attract pests, creating a less desirable living environment. Additionally, there are potential health risks associated with any leakage or malfunction of the system.</p>		<p>The proposed development, once completed, will have a positive impact on people's health and well-being by increasing the resilience of the sewerage infrastructure. The Municipality is implementing the project completely to improve the sanitation services provided to the community and to prevent spillage and surcharge onto the beach and ocean.</p> <p>PS1: The existing building will be refurbished and used to house control systems, isolation equipment and an odour control system. The municipality also performs frequent housekeeping and removes items that can attract pests. It should also be kept in mind that the sewerage system extends from the households that can also attract pests, these are not limited to the pump stations only.</p> <p>PS4: All works will be housed within the structure with an odour control facility.</p>	30

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		<p>All pump stations will be fitted with odour control units. PS1 is currently fitted with sand traps and screens and no odours are currently being omitted from them, the upsizing of the pump stations will not result in new odours emanating.</p> <p>Please also refer to response 23 for additional information.</p>	
4. Noise Pollution: The operational noise from the pump station could be disruptive to the peace and quiet of our residential area, impacting the quality of life for local residents.		<p>PS4: The generator will be designed for low noise emission levels, due to pump station proximity within this residential area, it is recommended that noise levels of 60dBA be specified, measured at 7m, as per residential levels specified by the COCT.</p> <p>All designs will be done in accordance with the required regulations to noise. Sound attenuation is being included in the design for generators and mechanical equipment to reduce noise and vibration.</p>	31
5. Increased Traffic and Construction Disruption: The construction phase will likely generate significant traffic and disturbances in the neighbourhood, affecting daily routines and safety.		<p>Construction activities will only be undertaken during off season periods to mitigate the potential disruptions. Additionally, a traffic management plan will be compiled by the appointed contractor and will conform to all construction traffic safety regulations.</p>	32
I urge you to consider these points seriously and reconsider the proposed location for the sewerage pump station. I appreciate your attention to this matter and look forward to your response.		<p>Thank you for your comments.</p>	33
COMMENT	NAME/ORGANISATION	RESPONSE	
Dear applicant  Due to technical issues, we would like to request for an extension to provide our Branch's comments.  Trust this is in order.	Vanessa Stoffels Road Use Management Chief Directorate Road Planning, Roads Branch	Your requested extension is granted as we will accept your comments and take them into consideration whenever we receive them.	34

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	Department of Infrastructure Western Cape Government 16 October 2024		
COMMENT	NAME/ORGANISATION	RESPONSE	
I hope this email finds you well. The proposed site for the development is outside the vicinity of aviation infrastructure and shows no significant or negative impacts on civil aviation activities and operations within the airport. However, if there are any structures or equipment or machinery such as excavators that will be used for the proposed project and may be considered excessively tall, kindly lodge an application with Air Traffic and Navigation Services (ATNS) as published on the SACAA website: <a href="http://www.caa.co.za/industryinformation/obstacles/">www.caa.co.za/industryinformation/obstacles/</a> . The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: <a href="http://www.caa.co.za">www.caa.co.za</a> . You are highly advised to notify George Airport regarding the proposed project for their comments.	Nrateng Mashiloane Aviation Environmental Compliance Department 18 October 2024	Thank you for the confirmation.	35
COMMENT	NAME/ORGANISATION	RESPONSE	
Good day  Objection to the Proposed Site for the Construction of a Sewerage Pump Station in Herold's Bay  Whilst I recognise the necessity of the construction of a new sewerage pump, I hereby formally object to the site of the proposed construction of a sewerage	Anna van Heerden 18 October 2024	<ol style="list-style-type: none"> <li>1. Please refer to page 80 – 96 of the BAR. All impacts are partly or highly reversible.</li> <li>2. Please refer to response 22 and 29.</li> <li>3. Please refer to response 30</li> <li>4. Please refer to response 22 and 31.</li> <li>5. The sewer pipeline to PS4 is being installed as part of the upgrade of Roodraai Road. No disruption along Roodraai Road will result from this project. The sewer</li> </ol>	36

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<p>pump station on Skimmelkranse Road in Herold's Bay. Please take into consideration the following matters:</p> <ol style="list-style-type: none"> <li>1. Environmental Impact: The proposed sewerage pump station and the construction thereof will have a significant and most probably an irreversible impact on the immediate environment, with the risk of pollution spreading further down the river and onto the beach area.</li> <li>2. Property Value Concerns: Herold's Bay is considered the hidden jewel of the Garden Route. A sewerage pump that is basically situated in the middle of the residential area will not only affect the immediate residents but all of those who live and visit here. Many houses cater for the tourist market and will be negatively affected if guests have to contend with noise and air pollution. Current homeowners' property will devalue with immediate effect. Moving the pump to a remote area will benefit everyone and uplift the community as a whole.</li> <li>3. Health and Safety Risks: Unpleasant odours go hand-in-hand with a sewerage pump. All the immediate residents will have to contend with this very undesirable situation. The smell of sewerage attracts other pests which will create a less than desirable living environment. Spillages, leakages and the malfunction of the system pose huge health risks for humans, as well the natural environment.</li> <li>4. Noise Pollution: A sewerage pump station is not noise free. The current position will cause the noise to reverberate up the valley and, given the size of the proposed pump, even up towards the residents of Rooidraai Road. The operational noise</li> </ol>		<p>pipeline between PS1 and PS4 (Skimmelkranse Lane) will be installed within a defined working space and full road closures will not be permanently enforced. Traffic will be managed at all times with the approved traffic management plans in place.</p> <p>In general, no construction will take place within the peak season.</p> <p>With regards to the installation along Spekpie Gericke Drive, please refer to response 32.</p>	
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**COMMENTS AND RESPONSE REPORT**

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<p>from the pump station will disrupt the peace and quiet of our town, negatively impacting the quality of life for local residents and visitors alike.</p> <p>5. Increased Traffic and Construction Disruption: The construction phase will likely generate significant traffic and disturbances in the neighbourhood, affecting daily routines and safety. Please note that Skimmelkraans Road is the main road into Herold's Bay and down to the beach area. It has also come to our attention that the proposed sewerage line from the planned pump station will be along Spekie Gericke Road. Construction along this road will lead to road closure and all residents on the western side of Herold's Bay who live along this road as well as others leading out of Spekie Gericke, will have no access to their properties with foreseeable complications in the long-run.</p> <p>I urge you to take note of these points and to seriously reconsider the proposed site for the sewerage pump station. I appreciate your attention to this matter and look forward to your response.</p>			
COMMENT	NAME/ORGANISATION	RESPONSE	
<p>Good afternoon Luanne,</p> <p>A meeting of a representative group of ratepayers was convened to discuss the pre- application for the upgrading of pump station 1 and associated rising main and the development of pump station 4 and associated rising main to the evaporation dams.</p> <p>The following matters were raised;</p> <p>1. A presentation on the reason for the upgrades and the redesign of the Herolds Bay sewage reticulation was done.</p>	<p>Ken Field Chair Person HBRPA and Ward Committee Member</p> <p>20 October 2024</p>		37

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<p>2. The positioning of the new pump station and the positioning of the rising main to the evaporation dams</p> <p>3. Construction of the emergency tank adjacent to pump station 1</p>			
<p>Numerous questions as to the necessity for the upgrade and the layout were raised but once answered the overall agreement of the meeting was that the upgrade was necessary in order to prevent sewage spills which are regular occurrences on the beach due to the significant flows during the season as a result of the densification of the Bay Area.</p> <p>After much discussion three areas of concern were raised as problematic</p> <ul style="list-style-type: none"> <li>• The position of pump station 4</li> <li>• The size and design of pump station 4</li> <li>• The laying of the rising main from pump station 4</li> <li>• The positioning of the rising main from pump station 4</li> </ul>			
<p>There were serious objections to the position of the pump station by the residents whose properties are located in that area from an environmental concern as it is placed close to the river so that any overflow or spillage will end up on the beach as it is in a confined area and therefore a containing wall is not possible to be constructed.</p>		<p>Please refer to pages 80-96 of the BAR for all impacts associated with this project and their mitigation measures</p> <p>An emergency storage tank is proposed under the parking area adjacent to PS1, in the event of failure or breakdown the sewage will flow into the storage tank to prevent spillages onto the beach or river.</p>	38

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<p>As it is planned to construct a screening plant prior to the delivery of the raw sewage to the holding tank it will be necessary to clear any detritus on a regular basis. This process is normally done manually and it is not clear how this is to be handled which concerned the meeting as if it is not properly handled could result in unacceptable odours and spillage in the close vicinity of residential dwellings.</p>		<p>Consideration has been made to the pump station's design and layout for the installation of automated front rake screens, screening conveyors, washer-compactors, and associated equipment. Thus, the manual hand rake screens being installed in this contract can be removed and replaced with the automated screens and associated equipment and controls without any major changes to the structure of the screening channels.</p> <p>The automated screens, screw conveyor and washer compactors will be installed on the first floor and discharge the screenings down a chute into the skip located on the ground floor. The municipality thus have the option to install automated mechanical front rake screens including all the ancillary equipment in the future.</p> <p>All pump stations will be fitted with odour control units. The pump stations are currently fitted with sand traps and screens and no odours are currently being omitted from them, the upsizing of the pump stations will not result in new odours emanating.</p>	39
<p>Sewage pump stations handling raw sewage with solids are normally noisy units which concerns the residents living in the close vicinity of the station. What ameliorating designs have been used to soften the effect of this excessive constant noise.</p>		<p>Please refer to response 22 and 31.</p>	40
<p>A question was asked as to whether any other position has been considered for the pump station. Mention was made that there was another possible area away from the residential area that should be investigated.</p>		<p>Please refer to response 22 and 23.</p>	41

**COMMENTS AND RESPONSE REPORT**

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<p>The meeting was astounded at the required size of the building at four stories and 22 meters length as this would be right in the sight of visitors entering Herolds Bay. Suggestions were that the building be separated into two units, possibly with the screening and pumping separated and also located at another position.</p>		<p>This will not be practical because of the land available. The Municipality is cognisant of the building size and the space in which it will be constructed and have employed architects as part of the engineering team to create a space that is aesthetically pleasing. The building height is required to accommodate the mechanical and electrical equipment, and the reduction of the footprint will be considered where possible. The total building height currently stands at 10m above ground. The 12m was the complete building height, of which 2.5m will be constructed below ground level.</p> <p>In addition, the building design from an architectural aspect also considers the surrounding environment and residential homes to ensure integration.</p>	42
<p>The installation of the rising main in Spekie Geriche was of great concern as it would preclude residents using the road for some time, the problem being that there are a number of permanent residents who use the road daily to commute to work. The question is could the old pipeline not be used and if not, could another route be investigated.</p>		<p>The existing pipeline is too small and must be upgraded to a larger diameter. The construction sequence is carefully being looked at to limit disruptions to residents. Excavation lengths will also be kept to a minimum, no excavations will be left open that will prevent access to properties.</p>	43
<p>Consideration needs to be given to the requirement for emergency vehicles to use the road in an emergency and the use of the road by heavy duty vehicles.</p>		<p>This is noted.</p>	44
<p>Concern was also raised regarding the raising main between pump station 1 and station 4 as to the positioning of the column on the curve above the bridge and the possibility of a breakage.</p> <p>The meeting suggested that the emergency tank between pump station 1 and the ablutions be completed ASAP so that it can be used in the interim</p>		<p>According to the George Municipality:</p> <p>The construction works sequence is budget dependent and only meaningful/practical phases can be implemented to avoid new infrastructure installed that cannot be used. Consideration has been given to a phased approach if the full budget for all upgrades is not available. Once the detail design is complete the construction sequences will be</p>	45

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<p>before pump station 4 is commissioned. It was also requested that the tank be moved beyond the current wall towards the beach and the height of the current wall be increased to prevent the sea damaging the bridge area.</p> <p>It is proposed that the chairman of the ratepayers and two representatives meet with your team to further discuss the proposals as we are aware that this project is of absolute necessity for the upliftment of Herolds Bay.</p>		<p>relooked at to align with the budget. The ablution facilities are not civil engineering infrastructure and is not funded by this project. The relevant Directorate must be approached for the upgrading of the ablution facilities. The increase in the wall is also not related to the sewage infrastructure upgrade, but the comment/concern is noted.</p> <p>A meeting will be arranged at a time convenient to all.</p>	
<p>Attendees at the meeting on the 18th October 2024 at 15h00 at [REDACTED] Herolds Bay</p> <p>D de Villiers [REDACTED]    H Kriel [REDACTED]    [REDACTED]    A J van Heerden [REDACTED]    M C Scholtz [REDACTED]    S Slabber [REDACTED]    S A de Reuck [REDACTED]    J A Coldrey [REDACTED]    N Crawley [REDACTED]    N van Wyk [REDACTED]    J Oosthuisen [REDACTED]    P Hoole [REDACTED]    D de Reuck [REDACTED]    J N Joubert [REDACTED]    K E Field [REDACTED]</p>		<p>Thank you for providing the names of I&amp;AP's.</p>	46
<p>Thank you for sharing the report with the Branch Oceans and Coasts. Unfortunately, due to previously received EIA reports this Branch can't</p>	<p>NAME/ORGANISATION</p>	<p>RESPONSE</p>	47
	<p>Tabisile Mhlana</p>	<p>Your requested extension is granted as we will accept your comments and take them into consideration whenever we receive them. An attempt to arrange the site visit was</p>	

**COMMENTS AND RESPONSE REPORT**

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meet the deadline even though it would have loved to review and comment on the proposed project. Considering that this is a pre-application will you kindly give us more time to coordinate comments within the Branch in the next two weeks and accommodate our request to conduct a site inspection on the 24th or 25th of October 2024 as we will be in the Garden Route that week.	Dept, Forestry, Fisheries & the Environment Oceans And Coasts - Coastal Development & Protection.  18 October 2024	unsuccessful with no response received to our email to arrange for an alternative site visit date.	
COMMENT	NAME/ORGANISATION	RESPONSE	
<p>COMMENTS ON PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED RISING MAIN AND THE DEVELOPMENT OF NEW ASSOCIATED INFRASTRUCTURE, ON ERF 116, ERF 110, ERF 113, REMAINDER OF ERF 95, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 10, 35 AND 37 OF FARM BRAKFONTEIN NO. 236, HEROLDS BAY:</p> <p>1 Forestry is responsible for the implementation and the enforcement of the National Forest Act (NFA), Act 84 of 1998 as amended and the National Veld and Forest Fire Act, Act 101 of 1998 as amended (NVFFA). Thank you for giving Forestry this opportunity to comment on above application.</p> <p>Forestry studied the supporting documents for the above-mentioned application and the following points related to Forestry's mandate i.e. the implementation of the NFA are applicable</p> <p>a. Forestry has no objection on above proposed sewage pump station 1 and associated rising main upgrade</p>	Melanie Koen  AREA MANAGER FORESTRY: WESTERN CAPE  Department of Forestry, Fisheries and the Environment  3 December 2024		48

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110, ERF 113, REMAINDER OF ERF 95, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 10, 35 AND 37 OF FARM BRAKFONTEIN  
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<p>b. Forestry request that off-sets be looked into where protected/ indigenous trees will be affected- upon NFA licence application.</p>		<p>Offsets will not be required.</p> <p>According to the Principles for biodiversity offsetting as set out in the National Biodiversity Offset Guideline of 2023, in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998):</p> <p>“Biodiversity offsets must only be considered once all the foregoing steps in the mitigation hierarchy have been considered to their full and feasible extent. The mitigation hierarchy dictates that the degradation and loss of biodiversity must be avoided, or where impacts cannot altogether be avoided, they should be minimised, and the area adversely impacted by relevant activity should be rehabilitated. When, after taking the aforementioned mitigation measures, there are likely to be residual negative impacts on biodiversity of medium to high significance, they must be offset”.</p> <p>According to the Botanical Impact Assessment:</p> <p>“The affected vegetation has been identified as Garden Route Granite Fynbos and Groot Brak Dune Strandveld. Both are currently listed as Critically Endangered. Given the linear nature of the project and the somewhat degraded state of the granite fynbos, the impact on terrestrial biodiversity is of medium-low concern. It is therefore recommended that the project (as currently presented) be approved, but subject to the proposed mitigation measures.”</p> <p>All botanical impacts after mitigation are low. Please refer to Appendix G1.</p> <p>According to the Terrestrial Faunal and Avifaunal Species Impact Assessment:</p>	<p>50</p>
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**COMMENTS AND RESPONSE REPORT**

**PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP  
 STATION 1 AND ASSOCIATED RISING MAIN AND THE DEVELOPMENT OF NEW ASSOCIATED INFRASTRUCTURE, ON ERF 116, ERF  
 110, ERF 113, REMAINDER OF ERF 95, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 10, 35 AND 37 OF FARM BRAKFONTEIN  
 NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE**

		"To this end, development under the preferred Alternative 2 will be acceptable from a faunal perspective as direct impacts on the receiving environment will result in only minor to insignificant loss or deterioration of faunal biodiversity in the receiving environment over the short term, and indirect impacts may be effectively managed over the long term. To this end, the development layout under Alternative 2 is supported from a faunal biodiversity perspective."	
c. Indigenous Forest as well as protected trees are protected under the National Forest Act (NFA) (Act No. 84 of 1998) as amended.		All impacts after mitigation are Low to Negligible. Please refer to Appendix G3.	51
d. This letter is not a NFA licence.		This is understood	52
3 Forestry reserves the right to revise initial comment based on any additional information that may be received			53