
The EAP
Sharples Environmental Services
P.O. Box 9087
GEORGE
6530

Attention: Mr Michael Bennet/Lu-anne Beets

Tel: 044 873 9087

Email: michael@sesc.net / luanne@sesc.net

RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE DRAFT BAR FOR THE PROPOSED UPGRADING OF HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED RISING MAIN AS WELL AS THE DEVELOPMENT OF PUMP STATION 4 AND NEW ASSOCIATED INFRASTRUCTURE, ON ERF 116, ERF 110, ERF 114, REMAINDER OF ERF 95, FARM 386, REMAINDER FARMS 236 AND 237 AND PORTIONS 0, 10, 35 OF FARM BRAKFORTEIN NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE

Good Day,

Your request for comment from the Sub-directorate: Coastal Management on the above-mentioned draft basic assessment report received on 9 February 2026, refers.

1. CONTEXT

- 1.1. The Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("NEM: ICMA") is a Specific Environmental Management Act under the umbrella of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"). The NEM: ICMA sets out to manage the nation's coastal resources, promote social equity and best economic use of coastal resources whilst protecting the natural environment. In terms of Section 38 of the NEM: ICMA, the Department of Environmental Affairs and Development Planning ('the Department') is the provincial lead agency for coastal management in the Western Cape as well as the competent authority for the administration of the "Management of public launch sites in the coastal zone (GN No. 497, 27 June 2014) "Public Launch Site Regulations".
- 1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The PCMP is a five (5) year strategic

document, and its purpose is to provide all departments and organisations with an integrated, coordinated and uniform approach to coastal management in the Province. The Department has developed the next generation PCMP that includes priority objectives for the next 5 years. This PCMP was adopted on 19 May 2023 and is available upon request.

- 1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol ("NEMP"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans.
- 1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.

2. COMMENT

- 2.1 The sub-directorate: Coastal Management ("SD: CM") has reviewed the information as specified above and have the following commentary:
 - 2.1.1. The George Municipality is proposing to undertake upgrades to the Sewerage network in Herolds Bay and aim to establish a new pump station inland from the beachfront on Erf 116 and Farm 0/236, situated higher up in the valley.

The high-level scope of work for the project includes:

 - 2.1.1.1. Refurbishing and upgrading the existing pump station (PS1) located on the beachfront
 - 2.1.1.2. Constructing the new pumpstation (PS4)
 - 2.1.1.3. Installing the interlinking pipelines
 - 2.1.2. The proposed alterations to PS1 will result in encroachment onto Coastal Public Property (CPP) of approximately 46m². This expansion is said to not trigger coastal listed activities as per the EIA Regulations Listing Notice 1, as the proposed expansion footprint is less than 50m² threshold and will result in less than 5m² of material being place in the footprint of the expansion.

- 2.1.3. The applicant accurately noted the subject property in relation to critical biodiversity and ecological support areas in accordance with the Western Cape Biodiversity Spatial Plan 2023.
- 2.1.4. The applicant indicated on page 43 of the draft BAR that the scope of work does not fall within the Coastal Protection Zone (CPZ) based on the DEA&DP Coastal Management Map Viewer. However, the SD: CM herewith informs the applicant that this is incorrect, as the scope of work and subject areas will indeed occur within the CPZ as defined in Section 16 of the NEM: ICMA and as indicated on the DEA&DP Coastal Management Map Viewer. The purpose of the CPZ is to avoid increasing the effect or severity of natural hazards in the coastal zone and to protect people and properties from risks arising from dynamic coastal processes, including the risk of sea level risks. Due to the subject property's location within the CPZ, Section 63 of the NEM: ICMA must be considered where an authorisation is required in terms of Chapter 5 of the NEMA. Furthermore, Section 62 of the NEM: ICMA obliges all organs of state that regulates the planning of land to apply that legislation in a manner that gives effect to the purpose of the CPZ. As such, Section 63 of the NEM: ICMA must be considered by local authorities for land use decision making.
- 2.1.5. The subject area is located seaward of the Garden Route District Coastal Management Line ("CML"). The technical delineation of the CML was to ensure that development is regulated in a manner appropriate to risks and sensitivities in the coastal zone. The CML was informed by various layers of information including biodiversity, estuarine functionality, risk flooding, wave run-up modelling, *inter alia* and was delineated in conjunction with and supported by organs of state. The principal purpose of the CML is to protect coastal public property, private property, and public safety; to protect the coastal protection zone; and to preserve the aesthetic value of the coastal zone. The use of CMLs is of particular importance in response to the effects of climate change, as it involves both the quantification of risks and pro-active planning for future development. Although the subject area for the proposed upgrades is located seaward of the CML, the SD: CM notes the nature of the development, and its proposed upgrades warrants its placement seaward of the CML as it forms part of essential services and is in the interest of the whole Herolds Bay.
- 2.1.6. The proposed upgrade and associated works align with Priority Area 5 of the Western Cape Provincial Coastal Management Programme (2022-2027) which aims to minimise the impacts of pollution on the coastal environment, through the promotion of appropriate mechanism to alleviate potential pollution and improvement of the water quality of the coastal environment. In this regard, the SD: CM supports any pollution control- and waste management interventions in order to prevent, minimise and strictly control harmful discharges into coastal ecosystems with appropriate monitoring measures.
- 2.1.7. It is noted that the proposed upgrades also align with the Provincial Spatial Development Framework, the George Municipal Integrated Development Plan, and the Municipal Spatial Development Framework.

- 2.1.8. Based on all the above-mentioned items, the SD: CM does not object to the proposed upgrades to the Sewerage network in Herolds Bay, provided that the mitigation measures proposed in the EMP are strictly adhered to.
3. The applicant must be reminded of their general duty of care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: *"...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment..."* together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment.
4. The SD: CM reserves the right to revise or withdraw its comments and request further information from you based on any information that may be received.

Yours faithfully

leptieshaam Bekko
CONTROL ENVIRONMENTAL OFFICER
SUB-DIRECTORATE: COASTAL MANAGEMENT
DATE: 13 March 2026