

---

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](mailto:michael@sesc.net) / [luanne@sesc.net](mailto: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 46m<sup>2</sup>. 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 50m<sup>2</sup> threshold and will result in less than 5m<sup>2</sup> 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 EMPr 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



Digitally signed by  
leptieshaam Bekko  
Date: 2026.03.13  
10:44:51 +02'00'

---

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

**REFERENCE:** 16/3/3/1/D2/29/0003/26  
**DATE OF ISSUE:** 27 March 2026

The Municipal Manager  
George Municipality  
% The Director: Civil Engineering Services  
P.O. Box 19  
George  
6530

Attention: Johannes Franciscus Koegelenberg

Tell: 044 801 9278  
E-mail: [koegelenberg@george.gov.za](mailto:koegelenberg@george.gov.za)

Dear Sir,

**ACKNOWLEDGEMENT OF RECEIPT AND COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED MAIN AND THE DEVELOPMENT OF PUMP STATION 4 AND NEW ASSOCIATED INFRASTRUCTURE, ON ERF 116, ERF 110, ERF 113, ERF 114, REMAINDER OF ERF 95, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 0, 10, 35 AND 37 OF FARM BRAKFRONTEIN NO 236, HEROLD BAY, GEORGE**

1. The abovementioned document compiled by your appointed Environmental Assessment Practitioner, Mr. Micheal Jon Bennett (EAPASA No: 2021/3163) and assisted by Candidate EAP Luanne de Waal (EAPASA No: 2024/7962) and Candidate EAP Onela Mhobo (EAPASA No: 2022/4522) of Sharples Environmental Services cc, as received by this Directorate on 9 February 2026 refers.
2. This letter serves as an acknowledgment of receipt of the Draft Basic Assessment Report ("DBAR") document by this Department on 9 February 2026.
3. This Directorate appreciates the extension to the commenting period, which the EAP has agreed to.
4. It is understood that the proposal entails upgrades to the sewage network in Herold's Bay Sewage Pumps Station 1 and associated rising main and the development of Pump Station 4 and new associated infrastructure on Erf 116, Erf 113, Erf 110, Erf 114, Remainder of Erf 95, Remainder of Farms 386, 236 and 237 and Portions 0, 10, 35 and 37 of Farm Brakfontein No. 236, Herold's Bay.

5. *Alternatives*

The investigation of alternatives in the EIA process is mandatory. This includes the option of not proceeding with the proposed activity (the "no-go" option). All alternatives identified must be determined to be feasible and reasonable. In this regard it must be noted that the Department may grant authorisation for an alternative as if it had been applied for, or may grant authorisation in respect of the whole or part of the proposed project in the application. Alternatives are not limited to activity alternatives, but include layout alternatives, design, operational and technology alternatives.

It is noted from Section H of the DBAR that various concepts have been considered, including layout alternatives and route alignments. Although the consideration of such alternatives is mandatory, it is a bit unclear which of these alternatives are in fact feasible and may be considered for approval.

It is understood from the consulting engineers report (Appendix L of the DBAR) that the high-level scope of work for this project includes the following:

- refurbishment and upgrade of the existing pumpstation number 1 on the beachfront,
- construction of the intermediate lifting pumpstation and
- the interlinking pipelines.

It is requested that a clear and concise description of the preferred alternatives is provided, specially with consideration of the Water Use Licence that has been approved.

6. *Synchronising applications in terms of other applicable legislation with the EIA process:*

(a) *National Water Act, Act No. 36 of 1998 ("NWA")  
(Synchronisation of the WULA – EIA processes / applications)*

Please be reminded that sub-section 24C(11) to the National Environmental Management Act, Act 107 of 1998, as amended (NEMA) stipulates that "a person who requires an environmental authorisation which also involves an activity that requires a licence or permit in terms of any of the specific environmental management Acts (i.e., NWA), must simultaneously submit those applications to the relevant competent authority or licensing authority, as the case may be, indicating in each application all other licences, authorisations and permits applied for". Failure to synchronise the processes may prejudice the application.

It is noted that a Water Use Licence (Licence NO: 01/K30B/I/16508) has been issued for the proposed development. It is not apparent that sub-section 24C(11) has been complied with.

Notwithstanding the above, you are required to submit all the specialist reports submitted as part of the WULA together with the BAR. The BAR must demonstrate how those reports have been considered and have influenced the determination of the preferred location, site and design and technology.

Further to the above, the EMPr must demonstrate how the requirements, mitigation measures and operational aspects of the Water Use Licence have been considered and incorporated.

(b) *National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA")  
(Synchronisation of the HIA – EIA processes / applications)*

It is noted that Heritage Western Cape (HWC) has been consulted on the applicability of the National Heritage Resources Act, 1999 (Act No. 25 of 1999), and said organ of state has issued correspondence on 24 April 2024. Nonetheless, the EAP must ensure that any previous comment is still applicable to the current application. Such comment must be included in the Final BAR.

7. *BAR Requirements*

7.1. Please ensure the Basic Assessment Report ("BAR") and Environmental Management Programme ("EMPr") contains all information requirements outlined in Appendices 1 and 4 respectively of the EIA Regulations, 2014. The BAR must also include and address any information requested in any previous correspondence/ processes in respect of this matter. The previous correspondence (Ref: 16/3/3/6/7/1/D2/29/0229/23) still has reference in this regard.

7.2. *Submission of the BAR*

In accordance with Regulation 19 of GN No. R. 982 of 4 December 2014, the Department reminds you 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.

If, however, 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:**

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.

8. Please note that it is prohibited in terms of Section 24F 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. Offences in terms of the NEMA and the Environmental Impact Assessment Regulations, 2014, will render the offender liable for criminal prosecution.
9. Kindly quote the above-mentioned reference number in any future correspondence in respect of this matter.
10. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received.

Yours faithfully

pp  Digitally signed by Francois Naudé  
Date: 2026.03.27 17:43:31 +02'00'

**HEAD OF DEPARTMENT**  
**ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 3**  
**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**  
(reference: 16/3/3/1/d2/29/0003/26)

Copied to: **Sharples Environmental Services cc**  
EAP: Michael Jon Bennett  
Candidate EAP: Luanne de Waal  
Candidate EAP: Onela Mhobo

E-mail: [michael@sescs.net](mailto:michael@sescs.net)  
E-mail: [luanne@sescs.net](mailto:luanne@sescs.net)  
E-mail: [onela@sescs.net](mailto:onela@sescs.net)

**George Municipality**  
Melanie Geyer

E-mail: [mgeyer@george.gov.za](mailto:mgeyer@george.gov.za)



REFERENCE: 4/10/2/K30A/ERF 116, HEROLDS BAY

DATE: 13 MARCH 2026

SHARPLES ENVIRONMENTAL SERVICES  
PO BOX 9087  
GEORGE  
6530

Attention: Ms L. de Waal

**RE: DRAFT 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 BRAK FONTEIN NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE**

Reference is made to the above-mentioned Draft Basic Assessment Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments.

The following are BOCMA comments relating to Draft Basic Assessment Report for the proposed upgrading of the Herolds 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 236, which should be adhered to:

1. The Breede-Olifants Catchment Management Agency has reviewed the Draft Basic Assessment and has no objections to the proposed development.
2. Please note that BOCMA issued a Water Use Licence (**Licence No: 01/K30B/I/16508**) dated 05 September 2025 for the upgrades of the Herolds Bay Sewage Pumpstation with associated infrastructure and applicant must adhere to the licence conditions and comply with all its provision.
3. 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 a fine and imprisonment.
4. 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 National Water Act that is associated with the proposed development.



5. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.
6. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.
7. 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 <http://www.dws.gov.za/e-WULAAS>
8. Should you have further enquiries, the office can be contacted or alternatively contact Mr. SI Ndlovu at the above-mentioned contact number or on [sndlovu@bocma.co.za](mailto:sndlovu@bocma.co.za)

Yours faithfully,

pp Si Ndlovu

**MR. JAN VAN STADEN**  
**CHIEF EXECUTIVE OFFICER (ACTING)**

**physical** 4<sup>th</sup> Floor, York Park Building,  
York Street, George, 6530

**website** [www.capenature.co.za](http://www.capenature.co.za)

**enquiries** Megan Simons

**telephone** 087 087 3060

**email** [msimons@capenature.co.za](mailto:msimons@capenature.co.za)

**Reference** LE14/2/6/1/6/2/RE ERVEN 236&237\_Linear  
Infrastructure\_Herold's Bay

**date** 13 March 2026

Sharples Environmental Services cc,  
P.O.Box 9087,  
George,  
6530

Attention: Ms Lue-anne de Waal  
By email: [luanne@sesc.net](mailto:luanne@sesc.net)

Dear Ms Lue-anne de Waal

**THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED RISING MAIN AND THE DEVELOPMENT OF PUMP STATION 4 AND NEW ASSOCIATED INFRASTRUCTURE, ON ERF 116, ERF 110, ERF 113, ERF 114, REMAINDER OF ERF 95, FARM 386, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 0 10, 35 AND 37 OF FARM BRAKFONTein NO. 236, HEROLDS BAY, GEORGE LOCAL MUNICIPALITY, WESTERN CAPE.**

**DEA&DP Reference: 16/3/3/1/D2/29/0003/26**

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)<sup>1</sup> the proposed activity will cross Critical Biodiversity Areas (CBA 1 & 2: Terrestrial). The fine-scale vegetation map describes the vegetation as Herold's Bay Asteraceous Fynbos and Groot Brak River Floodplain (Vlok *et al.*, 2008)<sup>2</sup>. According to the South African Vegetation Map (Beta VegMap, 2024)<sup>3</sup>, the vegetation units present are Garden Route Granite Fynbos and Groot Brak Dune Strandveld, which are listed as **Critically Endangered** and **Endangered**, respectively (NEM:BA, 2022)<sup>4</sup>.

Part of the sewer pipe also transverses a natural unchannelled valley-bottom wetland (Nel *et al.*, 2011)<sup>5</sup>. Furthermore, the property is within the National Strategic Water Source Area surface

<sup>1</sup> CapeNature. 2024. 2023 Western Cape Biodiversity Spatial Plan and Guidelines. Unpublished Report

<sup>2</sup> 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.

<sup>3</sup> South African National Biodiversity Institute (2006-2024). The Vegetation Map of South Africa, Lesotho and Swaziland, Mucina, L., Rutherford, M.C. and Powrie, L.W. (Editors), Online, <https://bgis.sanbi.org/Projects/Detail/2258>, Version 2024.

<sup>4</sup> 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

<sup>5</sup> 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

water for the Outeniqua region and serves as a watercourse protection for the South Eastern Coastal Belt. CapeNature has reviewed the draft Basic Assessment Report and associated specialist assessments, and we have the following comments:

1. The Garden Route Granite Fynbos is one of the **seven high risk Critically Endangered** vegetation types in South Africa (Skowno et al. 2018)<sup>6</sup>. While portions of the proposal involve upgrading existing infrastructure within previously transformed or disturbed areas, several components of the project traverse natural and highly sensitive Critical Biodiversity Areas (CBA) and intact natural vegetation. Protection of remaining intact examples of this ecosystem is therefore considered a national conservation priority. Where feasible, alternative alignments should be considered to reduce disturbance within sensitive areas.
2. The remainder of ERF 236 and ERF 237 was presented to CapeNature's Stewardship Review Committee Meeting on 15 September 2022. The Stewardship Review Committee solely focusses on assessing the biodiversity value and the potential for protected area expansion. The majority of the committee members agreed that based on the biodiversity value the site can qualify for **Contract Nature Reserve**.
3. The Western Cape Biodiversity Spatial Plan identifies priority areas for conservation and is a driving principle for the Western Cape Protected Area Expansion Strategy. Conserving the site within the protected areas estate is in line with the CBA objectives. Declaring the property in terms of NEM:PAA would safeguard the CBA corridor which is aligned to the management objectives. In addition to CBA, which is a core criterion for protected area expansion, the property meets the following criteria of the Western Cape Protected Area Expansion Strategy:
  - **Threatened ecosystems:** *Critically Endangered (Garden Route Granite Fynbos);*
  - **Under-protected ecosystems and strategic landscapes:** *Not protected;*
  - **Essential habitat for priority species:** *Yes, several Species of Conservation Concern were found;*
  - **Strategic Water Source Areas:** *Outeniqua SWSA for surface water; and*
  - **Climate change and connectivity corridors:** *contributing to the protection of the Maalgate River estuary.*
4. Given that the property qualifies for declaration as a Contract Nature Reserve, it is important that any development within the proposed conservation area does not compromise the long-term conservation objectives of the site. The proposed infrastructure should therefore be carefully evaluated in consultation with the landowner and the stewardship partners to ensure that:
  - Conservation objectives remain achievable.
  - Development does not compromise the ecological integrity required for formal declaration.
  - Long-term management of the site remains feasible.
5. CapeNature recommends that the landowner and stewardship partners be formally consulted regarding the proposed development, as the proposed infrastructure may influence future conservation planning and management of the site.
6. Previous biodiversity assessments undertaken on the property recorded several species of conservation concern, including species classified as **Near Threatened** (*Cullumia carlinoides*, *Erica dispar*, *Freesia caryophyllacea*, *Freesia leichtlinii* ssp. *Alba*, *Holothrix Pilosa*, and

---

<sup>6</sup> 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.

*Oxalis pendulifolia*), **Endangered** (*Euchaetis albertiniana*, *Disa hallackii*, *Lampranthus pauciflorus*, and *Muralta knysnaensis*), **Vulnerable** (*Drosanthemum edwardsiae* and *Gladiolus vaginatus*). The current botanical assessment only recorded *Cullumia carlinoides*.

7. It is therefore recommended that consultation be undertaken with the botanists involved in the earlier surveys, including Jan Vlok and Bionerds, to confirm survey timing, methodology and possible locations of recorded species.
8. Pre-construction walk-down surveys during the appropriate flowering season should be undertaken to ensure that species of conservation concern are not impacted.
9. The wastewater treatment and effluent management must be aligned with the long-term protection of the surrounding biodiversity and ecological processes.
10. Strict environmental management and rehabilitation measures must be implemented during construction, including clear demarcation of no-go areas, minimisation of the construction footprint, erosion and sediment control, and rehabilitation using locally appropriate indigenous vegetation.
11. Access along the pipeline servitude should be strictly controlled to prevent the creation of new informal access routes which could facilitate illegal dumping, wood collection, poaching or further disturbance of the natural environment.

In conclusion, CapeNature understands the need to upgrade essential municipal infrastructure; however, given the biodiversity sensitivity and stewardship status of the site, the proposal must demonstrate that ecological integrity and conservation objectives will not be compromised.

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)**



**13 March, 2026**

**Fynbos Eiendomme (Pty) Ltd.  
Reg. #: 2024/586342/07  
105 Buitenkloof Studios  
8 Kloof Street  
Cape Town  
8001**

**Supported by:**



**Wilderness Foundation Africa  
94 Main Road  
Walmer  
Port Elizabeth  
6070**

**Subject: Comments on the Draft Basic Assessment Report (DBAR) – Proposed Sewer Infrastructure Upgrade, Herolds Bay**

Dear Sir / Madam,

Thank you for the opportunity to review the documentation and to provide comments on the proposed development and associated specialist studies.

In principle, we recognise the need to upgrade the existing sewerage infrastructure to ensure that the system functions effectively and to minimise the risk of failures that could result in environmental or public health impacts.

However, after reviewing the DBAR and associated documentation, several matters require clarification, further assessment, or additional mitigation to ensure that potential environmental and social impacts are appropriately addressed.

Our comments are outlined below.

---

## 1. Declaration of Farm 386 as a Nature Reserve

The Remainder of Farm 386 is currently in the process of being formally declared a Nature Reserve through CapeNature. It is important that the Environmental Assessment Practitioner (EAP) ensures that the Applicant and relevant specialists are made aware of this status so that any project components and potential impacts can be reconsidered where necessary.

Once the declaration is finalised, the provisions of the **National Environmental Management: Protected Areas Act, 2003 (NEMPAA)** will apply. This legislation is currently indicated as “not applicable” in the BAR, which may be due to the EAP not being aware that the property has been earmarked for proclamation as a nature reserve.

Following declaration, any activities within the reserve will require approval from the management authority and conservation agency (CapeNature), and must comply with the approved reserve management plan. It is therefore recommended that formal comment be obtained from CapeNature on the proposed development. The Environmental Management Programme (EMPr) should also be updated to specify that all activities must comply with the reserve management plan once it has been finalised.

It is further noted that the existing servitude through the proposed nature reserve is not sufficiently wide to accommodate the second pipeline and that an additional 4 m servitude on the northern side will be required. As this infrastructure will traverse land earmarked for declaration as a nature reserve, the necessary approvals must be obtained from the reserve management authority for the establishment of the additional servitude.

Furthermore, as the landowner, we note that no formal approach has yet been made regarding this matter. Clarification is requested as to whether landowner consent will be required for the additional servitude and when formal consultation with us, the landowner, will take place.

---

## 2. Screening Tool

The environmental screening tool report included in the BAR was generated in 2022. It is recommended that a new screening tool report be generated to ensure that the information reflects the most recent available environmental datasets, i.e. the 2023 version of the Western Cape Biodiversity Spatial Plan and Critical Biodiversity Areas database.

---

### **3. Site Sensitivity Verification (SSV) Report**

It is noted that the Site Sensitivity Verification (SSV) Report was not appended to the Draft BAR for public review. Including this report as part of the public participation documentation would have been beneficial, as it would have provided additional clarity regarding the screening outcomes and the rationale for certain specialist studies, such as the socio-economic assessment, not being undertaken.

---

### **4. Need and Desirability and Design Alternatives**

There is a clear need for the upgrading of sewerage infrastructure in Herolds Bay, and the importance of ensuring that the system functions effectively is acknowledged. However, the location of the proposed pump stations remains a concern to members of the public, as was raised during the pre-application public participation process.

While it is understood that alternative locations were investigated and were considered not feasible due to engineering and financial constraints, concerns remain regarding the placement of the new pump station and the pipeline alignment through the proposed nature reserve.

In particular, concerns relate to the potential impacts associated with the construction, operation, and long-term presence of the infrastructure within the reserve, including possible maintenance activities, spills, or leaks.

It is noted that the pipeline will be installed within a 30 m corridor within which the botanical specialist identified Species of Conservation Concern (SCCs) and protected trees. The recommendation that these sensitive species be avoided during the final alignment of the pipeline is supported, and the pipeline should not be installed in areas where such vegetation occurs.

---

### **5. Listed Activities**

A minor concern relates to the listed activities associated with Pump Station 1 (PS1) on Erf RE/95. The upgrade to the existing pump station will result in an expansion of approximately 46 m<sup>2</sup>. The pump station is located within Coastal Public Property (CPP) and adjacent to a Small Temporary Closed Estuary.

The Draft BAR indicates that, because the expansion is less than 50 m<sup>2</sup> within CPP, Listing Notice 1 Activities 15, 17, 19A and 52 are not triggered. While this may be technically correct, it would generally be more precautionary to include these activities given the very small margin involved (4 m<sup>2</sup>). Regulations related to the Coastal Protection Zone (CPZ) need to be applied. (CPZ: continuous strip of land, starting from the High-Water Marks and extending 100 m inland in developed urban areas zoned as residential, commercial, or

public open space, or 1 000 m inland in areas that remain undeveloped or that are commonly referred to as rural areas. It also includes certain sensitive or at-risk land such as **estuaries, littoral active zones and protected areas.**)

---

## 6. Legislation, Management Plans and Frameworks

The following matters require clarification or further consideration:

- The **Garden Route Environmental Management Framework (EMF)** does not appear to have been consulted or incorporated in the assessment.
  - The Draft BAR notes that PS1 falls within Coastal Public Property and identifies the **Integrated Coastal Management Act, 2008 (ICMA)** and the **Western Cape Provincial Coastal Management Programme (2022–2027)** as applicable legislation. However, the report does not clearly demonstrate how the proposed development aligns with these frameworks.
  - Specialists should ensure that the most recent versions of the **Western Cape Biodiversity Spatial Plan (WCBSP)**, **National Biodiversity Assessment (NBA)** datasets and the **Red List of Ecosystems (RLE)** are used prior to submission of the Final BAR.
  - The Comments and Responses Report (CRR) refers to the **City of Cape Town** in Issues 22 and 31. These references should be corrected to the **George Municipality**.
  - Confirmation is required that adequate municipal services (water, electricity, sewage and waste management) are available to support the development. This information has not been included in the BAR.
- 

## 7. Coastal and Marine Impacts, Climate Change and Storm Surges

No marine specialist study appears to have been undertaken as part of this process. As a result, potential impacts on the coastal and marine environment have not been specifically assessed.

Although the development is outside marine protected areas, it still occurs within the broader coastal environment. Potential environmental health risks associated with sewage leaks or spills should therefore be considered.

While the project aims to reduce existing leaks and spillages, infrastructure failure could still occur due to operational faults, erosion or extreme events. Should such failures occur, contamination of soils, groundwater, surface water and the marine environment could result.

The BAR indicates that sewage overflow could occur under certain failure scenarios and that emergency storage capacity is limited. Given the proximity to a sensitive coastal environment that is widely used for recreation, such events could present risks to environmental and human health.

In addition, although the design reportedly considers storm surges and sea level rise associated with climate change, the potential impacts of such events on infrastructure failure and sewage discharge have not been assessed.

At a minimum, it is recommended that a **Marine Compliance Statement** prepared by a suitably qualified specialist be included to assess potential risks to the coastal and marine environment and to propose appropriate mitigation measures.

---

## **8. Wastewater Treatment Works (WWTW) Capacity and Implications for Farm 386**

Considering the upgrades to the pump station (and the bulk sewer infrastructure) will increase throughflow volume to the WWTW, can the current WWTW configuration (treatment ponds/groundwater infiltration) handle such an increase? This seems unlikely, and if groundwater infiltration remains the effluent discharge mechanism (as we understand is currently used), it is reasonable to assume that the footprint of the WWTW may need to expand to accommodate additional ponds to handle higher volumes.

The other alternative considered is constructing sewage conveyance infrastructure through ERF 386 to discharge treated effluent offshore or at a location other than through the WWTW ponds. Could the Applicant clarify what measures are planned to manage the increased sewage volumes resulting from the proposed upgrades, and how the treated effluent will be managed or discharged.

As owners of ERF 386, we are particularly concerned about the potential implications of increased WWTW capacity and the associated impacts on terrestrial habitats, groundwater, and the coastal or marine environment, should the treated effluent ultimately be discharged offshore. It is essential for the BAR to provide clarity on how these increased volumes and associated infrastructure requirements are being addressed. Have the impacts associated with this been assessed?

Reference must also be made in terms of possible risks to the nearby Maalgate River Estuary. (Refer to the 'Maalgate River Estuarine Management Plan, 2019')

---

## **9. Specialist Studies**

### **Faunal Assessment**

The faunal assessment appears comprehensive and methodologically sound. However:

- Spatial datasets should be updated where necessary to reflect the most recent biodiversity planning information.
- The EMPr should specify that search-and-rescue or relocation of animals during site preparation must be undertaken by a suitably qualified specialist.

- Operational risks such as leaks, spills and long-term environmental impacts should be assessed more fully.

### **Floral Assessment**

The botanical assessment is also considered robust, but several improvements are recommended:

- Updated spatial datasets should be used.
- A clear distinction should be made between confirmed and potentially occurring SCCs.
- A comprehensive list of potential SCCs should be provided based on habitat suitability.
- A formal Site Ecological Importance (SEI) evaluation would improve transparency.
- The EMPr should require specialist supervision for plant rescue, marking of protected trees, and rehabilitation activities.
- Alien and invasive species clearing should follow a formal management plan.
- A detailed rehabilitation plan should be prepared and implemented by a specialist.

### **Terrestrial Biodiversity Assessment**

The terrestrial biodiversity assessment focuses largely on flora and does not include fauna. Incorporating faunal aspects and ecological interactions would provide a more comprehensive assessment.

The assessment should also consider terrestrial habitats associated with the **Strategic Water Source Area (SWSA)** and include a formal combined SEI evaluation.

---

## **10. Operational Noise**

The BAR states that there will be no operational noise impacts, although the basis for this conclusion is not clearly explained.

The recommendation that generator noise levels remain below **60 dBA at 7 m** is supported. Mitigation measures such as acoustic louvres, enclosure of the generator and sound-absorbing materials should be implemented.

Clarification is also requested regarding the procedures the Municipality will implement to address legitimate noise complaints from nearby residents once the infrastructure becomes operational.

---

## 11. Odour

The proposed odour control upgrades at Pump Station 1 and the installation of a system at Pump Station 4 are noted.

However, the service life of the filtration media is uncertain because no hydrogen sulphide (H<sub>2</sub>S) study has been undertaken. It is therefore recommended that either an H<sub>2</sub>S study be conducted or that the system be regularly monitored and proactively maintained to ensure effective odour control.

Clarification is also requested regarding procedures for responding to odour complaints from nearby residents.

---

## 12. Socio-Economic and Health Impacts

No dedicated socio-economic impact assessment appears to have been undertaken.

While the BAR discusses positive socio-economic benefits, potential negative impacts are not adequately addressed. These should at least be acknowledged and assessed.

Key issues that warrant further consideration include:

- Impacts on neighbouring landowners;
- Effects on the recreational and amenity value of Herolds Bay, including its **Blue Flag Beach** status;
- Public health risks associated with sewage spills; and
- Broader community concerns.

A risk assessment or health impact assessment should be undertaken to evaluate potential public health implications should sewage reach the beach or surrounding environment.

---

## 13. Operational Risks and Long-Term Risk Management

Operational risks such as system failures, leaks, spills and potential sewage discharge to the environment have not been fully addressed in the BAR or EMPr.

While emergency preparedness during construction is described, operational emergency procedures have not been clearly defined.

Potential impacts on soils, groundwater, surface water, the marine environment and terrestrial ecosystems should be assessed and appropriate mitigation measures included in the EMPr.

Additional safeguards such as telemetry alarms, automatic shutdown systems, secondary containment and expanded monitoring programmes should be considered.

The monitoring programme should also extend beyond the pump stations to include appropriate locations along the pipeline route. Monitoring frequency and reporting procedures should be clearly defined.

---

#### **14. Long-Term Maintenance**

The potential environmental impacts associated with long-term maintenance activities have not been addressed.

Maintenance activities may involve excavation, disturbance of vegetation and wildlife, noise generation and possible spills. The EMPr should clearly outline the expected frequency of maintenance and associated mitigation measures during the operational phase.

---

#### **15. Geotechnical Assessment**

A geotechnical investigation has been undertaken, but it was not circulated as part of the public participation process.

The investigation indicates that shoring, sheet piling and dewatering will be required at Pump Station 1 and that chemical rock splitting will be used at Pump Station 4.

Potential environmental impacts associated with these excavation activities, particularly in a coastal environment with shallow groundwater and unconsolidated sediments, should be assessed. Appropriate mitigation measures should also be included.

---

#### **16. Public Participation**

It is noted that comments have been requested but not yet received from several authorities. Feedback should be obtained from the following prior to submission of the Final BAR:

- Garden Route District Municipality
- Western Cape Department of Agriculture
- CapeNature
- Western Cape Department of Transport and Public Works
- DFFE: Oceans and Coasts – Coastal Development and Protection
- DEA&DP: Pollution Management
- DEA&DP: Waste Management

- DEA&DP: Biodiversity
- DEA&DP: Coastal Management

In particular, input from CapeNature and coastal management authorities will be important given the environmental sensitivity of the area and the pipeline alignment through the proposed nature reserve.

---

## **Conclusion**

Overall, the assessment process and specialist studies appear to broadly follow applicable legislative requirements and environmental assessment guidelines. The proposed infrastructure upgrade is necessary to ensure the effective functioning of the sewer system and to reduce the risk of failures that could result in more severe environmental and community impacts.

However, several potential risks and impacts have, in our view, not been sufficiently assessed. Additional clarification, further assessment and the incorporation of appropriate mitigation and management measures into the BAR and EMP are therefore recommended to ensure that potential environmental, social and health impacts are adequately addressed.

We trust that these comments will assist in strengthening the final assessment and ensuring that the proposed development proceeds in an environmentally responsible manner.

Yours sincerely,



**Jan Vreken**

Director: Fynbos Eiendomme (Pty) Ltd.  
Owners of Farm 386: Vrij Heerlikheid



Ref: DOI/CFS/RN/LU/WLWP-12/19 (Application No: 2026-03-0042)

Sharples Environmental Services cc  
PO Box 9087  
**GEORGE**  
6530

Attention: Ms L Beets

Dear Madam

**DRAFT BASIC ASSESSMENT REPORT: PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED RISING MAIN AND THE DEVELOPMENT OF PUMP STATION 4 AND NEW ASSOCIATED INFRASTRUCTURE: ERF 116, ERF 110, ERF 113, ERF 114, REMAINDER OF ERF 95, FARM 386, REMAINDER OF FARM 236, REMAINDER OF FARM 237, PORTION 0 OF FARM BRAK FONTEIN 236, PORTION 10 OF FARM BRAK FONTEIN 236, PORTION 35 OF FARM BRAK FONTEIN 236 AND PORTION 37 OF FARM BRAK FONTEIN 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE**

1. The following refer:
  - 1.1 This Branch's letter DOI/CFS/RN/LU/WLWP-12/19 (Application No: 2025-01-0030) dated 26 March 2025 to Confluent Environmental.
  - 1.2 Your draft basic assessment report 14/HBPS/GM/04/23 dated 23 January 2026.
2. Like this Branch's comments to Confluent Environmental will Main Road 347 (MR00347; R404) and Minor Road 6876 (OP06876), both roads for which this Branch is the Road Authority, only be affected in terms of temporary construction access.
3. This Branch offers no objection to the proposed construction activities, provided that the appointed civil engineering professional accepts a handover of the affected road sections from the offices of the District Roads Engineer (DRE) once the DRE approved that professional's temporary traffic accommodation plans.

Yours Sincerely

**DD FORTUIN**

**For DEPUTY DIRECTOR-GENERAL: TRANSPORT INFRASTRUCTURE BRANCH**

**DATE: 12 MARCH 2026**

## ENDORSEMENTS

1. Sharples Environmental Services cc  
Attention: Ms L Beets (e-mail: [luanne@sescs.net](mailto:luanne@sescs.net))
  
2. Confluent Environmental  
Attention: Dr J Dabrowski (e-mail: [james@confluent.co.za](mailto:james@confluent.co.za))
  
3. District Roads Engineer  
Oudtshoorn
  
4. Mr E Burger (e-mail)
  
5. Mr DD Fortuin (e-mail)
  
6. Mr M Steyn (e-mail)

Re: NOTICE OF THE DRAFT BAR FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE

JH Jan Vreken  
To: You

Reply Reply all Forward  
Mon 16 Feb 2026 12:08

- JH Vreken ID-card.pdf 207 KB
- NOTARIAL DEED OF SERVITU... 406 KB

2 attachments (614 KB) Save All Attachments

Dear Lu-anne,  
The abovementioned BAR was recently brought under my attention and I would like us to be registered as an IAP.  
I represent Fynbos Eiendomme (Pty) Ltd., the new owner of the consolidate... (deed of servitude / proof of ownership attached).  
I include my ID pre-emptively.  
Many thanks and best regards,

Jan Vreken  
DIRECTOR: FYNBOS EIENDOMME (PTY) LTD.



Re: NOTICE OF THE DRAFT BAR FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE

JH Jan Vreken  
To: You

Reply Reply all Forward  
Wed 18 Feb 2026 14:41

You replied on Thu 19 Feb 2026 07:42

View conversation

Dear Lu-anne,  
I'm just following up on the below. Please confirm receipt of my email and registration as an IAP.  
Many thanks,

Jan Vreken

On Mon, 16 Feb 2026 at 12:07, Jan Vreken - ... wrote:  
Dear Lu-anne,

The abovementioned BAR was recently brought under my attention and I would like us to be registered as an IAP.  
I represent Fynbos Eiendomme (Pty) Ltd., the new owner of the consolidate... (deed of servitude / proof of ownership attached).  
I include my ID pre-emptively.  
Many thanks and best regards,

Jan Vreken  
DIRECTOR: FYNBOS EIENDOMME (PTY) LTD.



Re: NOTICE OF THE DRAFT BAR FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE

JH Jan Vreken  
To: You

Reply Reply all Forward ...

Thu 19 Feb 2026 09:38

You replied on Thu 19 Feb 2026 10:34

View conversation

Dankie Lu-anne, ek waardeer.

Indien daar enige vorige dokumentasie is wat ons dalk nie gekry het wat relevant kan wees, stuur dit asb. aan.  
Ek kon die dokumentasie op jul website access maar as daar enige-iets anders is, laat weet asb.

Beste groete,

Jan

FW: NOTICE OF THE DRAFT BAR FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE

BD Ben-Jon Dreyer  
To: You  
Cc: [Redacted]

Reply Reply all Forward ...

Tue 24 Feb 2026 10:32

You replied on Wed 25 Feb 2026 07:41

View conversation

To whom it may concern,

Wilderness Foundation Africa (WFA) hereby requests to be registered as Interested and Affected Party concerning: THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED RISING MAIN AND THE DEVELOPMENT OF PUMP STATION 4 AND NEW ASSOCIATED INFRASTRUCTURE, ON ERF 116, ERF 110, ERF 113, ERF 114, REMAINDER OF ERF 95, FARM 386, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 0, 10, 35 AND 37 OF FARM BRAKFOONTEIN NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE.

Please provide written response regarding receipt of this email.

Kind Regards

Ben-Jon Dreyer

Ben-Jon Dreyer  
Protected Area Programme Manager: Arid Landscapes



Opgradering van die rioolstelsel te Heroldsbaai: Gericke singel

L  
To: christiaan@sesc.net  
Cc: You

Reply Reply all Forward ...

Fri 27 Feb 2026 10:47

You replied on Mon 02 Mar 2026 14:18

View conversation

Goiedag,

My telefoongesprek met Christiaan sopas hou verband.

Ek doen 'n navraag namens DankieTog Trust wat 'n eiendom teen Gericke singel in Heroldsbaai besit.

Die trust is genader om kommentaar te lewer op die opgradering van die rioolpomp, stasie 1 te Heroldsbaai en die nuwe infrastruktuur vir riool wat op die munisipale grond gebou gaan word.

Mag ek asseblief die volgende vra:

1. Waar presies is stasie 1 geleë? (op 'n kaart van Heroldsbaai)
2. Waar gaan die nuwe infrastruktuur presies opgerig word?
3. Wanneer gaan die proses begin en hoe lank gaan dit waarskynlik wees?
4. Gaan daar enige uitdagings in terme van geraas in die omgewing wees?
5. Gaan daar enige uitdagings in terme van reuk/tydelike toilette/behuising naby die woonhuise in Gericke singel wees?
6. Gaan enige bestaande/nuwe strukture 'n invloed op die waarde van enige van die strandhuise reg langs Gericke singel hê?

Baie dankie vir julle tyd en moeite.

Ons sien uit om die antwoorde op hierdie vrae te ontvang.

Groete  
Luisa van der Linde

RE: NOTICE OF THE DRAFT BAR FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE

SB Stephanie Barnardt  
To: You

Reply Reply all Forward ...  
Mon 02 Mar 2026 07:37

Good day

Thank you for giving HWC the opportunity to comment.

Please note that our previous comment still stands, no further action is required from heritage.

Please let me know if you need a digital copy of the record of the decision.

Kind regards,

Stephanie-Anne Barnardt-Delport  
Heritage Officer (Archaeologist)  
Heritage Western Cape

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town  
(Currently working remotely)

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



RE: NOTICE OF THE DRAFT BAR FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE

KF Ken Field  
To: You; 'Michael Bennett'  
Cc: 'Dorien Werth'; 'Francois Naude'

Reply Reply all Forward ...  
Wed 04 Mar 2026 15:28

Good afternoon Luanne.

I am rather concerned about re advertisement of the proposal for the establishment of the pump station at Herolds Bay. This proposal had been under objection by the Ratepayers Association representing the ratepayers in the Bay Area for some time. In fact some three meetings with the Municipality had taken place where our objections had been lodged and discussed. Although the meeting agreed that the pump station was necessary to resolve the waste water problem the siting of the station and the proposed layout of the rising main was unacceptable to the majority of the ratepayers. This decision was decided at a public participation meeting held to illicit the concerns of the attendees. I note that the Municipality has informed me of a follow up meeting is to be held shortly to reach finality regarding the positioning of the pump station and the scheduling of the rising main to the dams.

Regards  
Ken Field

Re: NOTICE OF THE DRAFT BAR FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE

SR Sharon de Reuck- [redacted]  
To: You  
Cc: [redacted]

Reply Reply all Forward ...

Wed 11 Feb 2026 13:53

You forwarded this message on Fri 13 Feb 2026 09:03

View conversation

Good day

I am unsure of this mail received again with mostly the same information, as I was under the impression that the meeting we held with the George Municipality last year March that they would be investigating alternative sites that do effect home owners so directly. What became of that and what was the outcome? I assume nothing due to this mail now received.

Also do our objections still stand or must we object again before your due date 13 March 2026. Please note, my previous objection of September 2024 is still the same and valid.

@ Ken Field what was the outcome of our meeting held in March 2025 with the Council and did you receive a reply from them?

Kind regards

Sharon de Reuck  
[redacted]

RE: Notification of Public Participation Process Herold's Bay Sewage

NP Nicolette Prinsloo [redacted]  
To: You  
Cc: [redacted]

Reply Reply all Forward ...

Sun 15 Feb 2026 21:33

Thank you for this information. I am Nicolette Prinsloo and we have a family house in the name of Wernic Trust at 56 Spekie Gericke street, Herold's Bay.

1. We have seen the overflow and heard the concern re the wastewater site on the hill at Herold's bay. Why are we pumping sewage from Hb Heights / Upper down to the beach and all the way up again if the plant cannot handle it? Surely the new developments like Oubaai and Eco estate has their own sewage pump stations. Can Hb Heights wastewater not possibly stay on the hill and be dealt with there? PS1 can then be renovated for the original Herold's Bay town.
2. Sewage pump stations are not allowed within proximity of rivers. Which you mention in your document. Then the new pump station should not be close to the stream?
3. The proposed building still looks like a monstrosity right at the entry of the town.
4. Noise and visual impact to the quaint beach town will be detrimental and lead to depreciation of property value of the landowners who is paying the high end of municipality taxes.

Kind regards

Nicolette  
[redacted]

Ask Copilot 62 of 118



Figure 32: possible alternative position of PS1 and the emergency storage tank  
Erf 114 and a portion of farm 236 is the preferred site for PS4. Alternatives were investigated but not feasible due to engineering and financial restraints

The existing pipeline crosses several properties: Remainder of Farm 236, Portion 37 of Farm 236, Portion 35 of Farm 236, Portion 10 of Farm 236, Portion 36 of Farm 236, Erf 116, Erf 237, Erf 113, Remainder of Farm 95. Since the proposal is to install the new pipeline parallel to the existing pipeline, the preferred installation site will have the least amount of negative impact on the environment.

Provide a description of any other property and site alternatives investigated.

Erf 114 (the car park next to PS1) may be an alternative location for PS1. Alternative options were investigated for the PS4 during the planning phase; the options were however not feasible. Due to space and property ownership.

Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix.

PS1 is an existing pump station and will be upgraded. Erf 114 is being looked into by the George Municipality as an alternative location for PS1.

Alternative routes were investigated for the installation of the rising main between PS4 and the WWTW, however it was a longer route.

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

---

**REFERENCE:** 16/3/3/6/7/1/D2/29/0229/23  
**DATE:** 07 November 2024

The Municipal Manager  
George Municipality: Water & Sanitation: Civil Engineering Services  
PO Box 19  
**GEORGE**  
6530

Attention: Johanns Fransiscus Koegelenberg

Tell: 044 801 1565

E-mail: [Jkoegelenberg@george.gov.za](mailto:Jkoegelenberg@george.gov.za)

**COMMENT ON THE PRE-APPLICATION BASIC ASSESSMENT REPORT SUBMITTED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT: ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED SEWER RISING MAIN AND THE DEVELOPMENT OF NEW ASSOCIATED INFRASTRUCTURE ON ERF 116, ERF 113, ERF 110, REMAINDER OF ERF 95, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 10, 35 AND 37 OF FARM BRAKFRONTEIN NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE**

1. 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.
2. This Directorate reviewed the documents and comment as follows:
  - 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.
  - 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.

2.3. Further to the above please provide a detailed map for the proposal inclusive of the maintenance road and working footprint.

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*.

Please obtain comments from Cape Nature on the proposal and include these comments in the Basic Assessment report.

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.

3. This Directorate awaits the submission of the application for Environmental Authorisation.
4. Please note that the activity may not commence prior to an environmental authorisation being granted by this Directorate.
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.

Francois Naude

Digitally signed by Francois Naude  
Date: 2024.11.07 15:03:10 +02'00'

pp

**HEAD OF DEPARTMENT  
ENVIRONMENTAL IMPACT MANAGEMENT SERVICES: REGION 3  
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Copied to: EAP: Michael Bennett  
George Municipality: Lauren Josias

E-mail: [michael@sescce.net](mailto:michael@sescce.net)  
E-mail: [Ljosias@george.gov.za](mailto:Ljosias@george.gov.za)



**BREED-OLIFANTS**  
CATCHMENT MANAGEMENT AGENCY

101 York Street 3rd Floor Room 302 George 6530, P.O Box 1205 George 6530

Enquiries: SI Ndlovu

Tel: 023 346 8000

Fax: 044 873 2199

E-mail: [sndlovu@bocma.co.za](mailto:sndlovu@bocma.co.za)

REFERENCE: 4/10/2/K30A/ERF 116, HEROLDS BAY

DATE: 04 OCTOBER 2024

SES ENVIRONMENTAL SERVICES  
PO Box 9087  
GEORGE  
6530

Attention: Ms L. Beets

**RE: PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE 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 BRAKFORTEIN NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE**

Reference is made to the above mentioned Pre-Application Basic Assessment Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments.

The following are BOCMA comments relating to the Pre-Application Basic Assessment Report for the the proposed upgrading of the Herold's Bay sewage pump station and associated rising main, which should be adhered to:

1. The proposed construction of a sewage pump station is located adjacent to a non-perennial stream and the rising main crosses the non-perennial stream, a regulated area of a watercourse, thus it triggers water uses in terms of section 21(c) & (i) of 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:
  - 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;*

**RE: PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE 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 BRAKFORTEIN NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE**

- (b) *In the absence of a determined 1 in 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*
- (c) *A 500 m radius from the delineated boundary (extent) of any wetland or pan.*
2. 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.
  3. Please note that no water shall be derived from the non-perennial drainage line and used during the construction without prior approval by means of a water use authorisation in terms of section 22 of the National Water Act, 1998 (Act No. 36 of 1998).
  4. If there will be storage of oil, diesel, hydraulic fluids and grease onsite used for heavy machinery; it is recommended that the storage areas for these fluids be bunded with cement and in such a manner that any spillages can be contained and reclaimed without causing any pollution.
  5. 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 a fine and imprisonment.
  6. 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 National Water Act that is associated with the proposed development.
  7. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.
  8. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.
  9. 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 <http://www.dws.gov.za/e-WULAAS>.
  10. Should you have further enquiries, the office can be contacted or alternatively contact Mr. SI Ndlovu at the above-mentioned contact number or on [sndlovu@bocma.co.za](mailto:sndlovu@bocma.co.za)

**RE: PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE 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 BRAKFORTEIN NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE**

Yours faithfully,

pp *Jan van Staden*

**MR. JAN VAN STADEN  
CHIEF EXECUTIVE OFFICER (ACTING)**





**forestry, fisheries  
& the environment**

Department:  
Forestry, Fisheries and the Environment  
REPUBLIC OF SOUTH AFRICA

**FORESTRY WESTERN CAPE:** Private Bag X 12, Knysna 6570

Reference: EIA-WC-GR-0019-2024-25

Enquiries: M Koen/ Tel: (044) 302 6900/ Fax: (044) 382 5461/ E-mail: [MKoen@dfre.gov.za](mailto:MKoen@dfre.gov.za)

---

**Sharples Environmental**

**Attention: Luanne Beets**

Email: luanne@sescs.net

Cell/ Tel: 044 873 4923

**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 BRAKFRONTEIN NO. 236, HEROLDS BAY:**

- 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.
- 2 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
  - a. Forestry has no objection on above proposed sewage pump station 1 and associated rising main upgrade
  - b. Forestry request that off-sets be looked into where protected/ indigenous trees will be affected- upon NFA licence application.
  - c. Indigenous forest as well as protected trees are protected under the National Forest Act (NFA) (Act No. 84 of 1998) as amended.
  - d. This letter is not a NFA licence.
- 3 Forestry reserves the right to revise initial comment based on any additional information that may be received

Yours Faithfully

  
pp. AREA MANAGER FORESTRY: WESTERN CAPE  
14/10/24



---

**D: PCM REFERENCE NUMBER:** 19/3/2/4/D2/29/PMIM014/24

**ENQUIRIES:** Gunther Frantz

**DATE: 18 October 2024**

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

**For Attention: Ms Lu-anne Beets**

Tel: 044 873 4923

Email: [luanne@sesc.net.co.za](mailto:luanne@sesc.net.co.za)

**PER EMAIL**

Dear Madam

**COMMENT ON THE DRAFT 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, HEROLD'S BAY**

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:

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.
2. In addition to the above, the D: PCM recommends that backup generator/s at PS1 also be protected against extreme ocean tidal or storm surge events, to prevent diesel spillages from generator fuel tanks.

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.
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):
  - 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.
  - 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.
  - 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.
  - 4.4. The storage of hazardous substances (i.e. petrol, diesel, and lubricants etc.) should be located on impervious bases within bunds (to accommodate 110% of the volume) to contain any fugitive spillages and/or leakages.
  - 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.

Please direct any enquiries to Gunther Frantz should you require clarity on the comments provided.

The Department reserves the right to revise or withdraw comments or request further information based on any information received.

Yours faithfully,

pp.  Digitally signed by  
Arabel McClelland  
Date: 2024.10.19  
00:41:21 +02'00'

**MS NATASHA DAVIS-WOLMARANS**  
**DIRECTOR: POLLUTION AND CHEMICALS MANAGEMENT**

CC: Dorien Werth (DEA&DP – Directorate: Development Management (Region 3))

Email: [Dorien.Werth@westerncape.gov.za](mailto:Dorien.Werth@westerncape.gov.za)

**Our Ref:** HM/ EDEN / GEORGE / HEROLDS BAY / RE FARM 236 BRAKFORTEIN,  
FARM 10/236 BRAKFORTEIN, 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  
**Case No:** HWC24041004SB0410  
**Enquiries:** Stephanie Barnardt  
**E-mail:** Stephanie.Barnardt@westerncape.gov.za  
**Tel:** 021 829 3315



**Applicant: George Municipality**  
**E-mail:** [mgeyer@george.gov.za](mailto:mgeyer@george.gov.za); [Jkoegelenberg@george.gov.za](mailto:Jkoegelenberg@george.gov.za); and [peter@carm.co.za](mailto:peter@carm.co.za)

**RESPONSE TO NOTIFICATION OF INTENT TO DEVELOP: FINAL**  
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape**  
**Provincial Gazette 6061, Notice 298 of 2003**

**NOTIFICATION OF INTENT TO DEVELOP: 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 BRAKFORTEIN, FARM 10/236 BRAKFORTEIN, 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, SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)**

The matter above has reference.

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

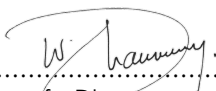
You are hereby notified that, since there is no reason to believe that the proposed upgrading of the Herold's Bay Pump Station and Associated Rising Main As Well As The Development Of New Associated Infrastructure, On Re Farm 236 Brakfontein, Farm 10/236 Brakfontein, Re Farm 237, Erf 116, Erf 113, Remainder 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.

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.

This letter does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

  
.....  
Waseefa Dhansay  
**Assistant Director: Professional Services**



[www.westerncape.gov.za/cas](http://www.westerncape.gov.za/cas)

**Street Address:** Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** P.O. Box 1665, Cape Town, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-mail:** ceoheritage@westerncape.gov.za

**Straatadres:** Protea Assuransie-gebou, Groentemarkplein, Kaapstad, 8000 • **Posadres:** Posbus 1665, Kaapstad, 8000  
• **Tel:** +27 (0)21 483 5959 • **E-pos:** ceoheritage@westerncape.gov.za

**Idilesi yendawo:** kumgangatho 3, kwisakhiwo iprotea Assurance, Greenmarket Square, eKapa, 8000 • **Idilesi yeposi:** Inombolo yebhokisi yeposi 1665, eKapa, 8000 • **Iinombolo zomnxeba:** +27 (0)21 483 5959 • **Idilesi ye-imeyile:** ceoheritage@westerncape.gov.za

RE: NOTICE OF THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND ...

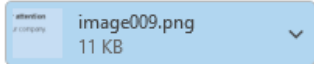


Nicole Abrahams (WR)

To luanne@sesc.net

Reply Reply All Forward

Thu 2024/09/12 13:15



Dear Luanne

SANRAL will not be affected by this development. SANRAL will only be affected if the pipeline crosses a National road

Regards

**Nicole Abrahams**

Environmental Coordinator

Western Region

Bellville 7530.

T:

www.sanral.co.za

Fraud Hotline number: 0800 204 558



Please consider the environment before printing this email message.

**Disclaimer:**

This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or without errors as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version. The South African National

OBJECTION : PUMP STATION HEROLD'S BAY



Sharon de Reuck  
To Iuanne@sesc.net  
Cc Kenneth Field

Reply Reply All Forward

Thu 2024/09/26 19:04

Follow up.  
You forwarded this message on 2024/09/30 13:58.

Good day

Objection to the Proposed Construction of a Sewerage Pump Station

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:

- 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.
- 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 such infrastructure due to health and aesthetic concerns.
- 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.
- 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.
- Increased Traffic and Construction Disruption:** The construction phase will likely generate significant traffic and disturbances in the neighbourhood, affecting daily routines and safety.

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.

Sincerely,

Sharon de Reuck  
[redacted]

Re: OBJECTION : PUMP STATION HEROLD'S BAY



Sharon de Reuck  
To Iuanne@sesc.net  
Cc Kenneth Field

Reply Reply All Forward

Fri 2024/10/04 15:10

You replied to this message on 2024/10/04 15:36.  
This message is part of a tracked conversation. Click here to find all related messages or to open the original flagged message.

Good day

Please can you confirm that my objection mail was received by you.

Kind regards

Sharon de Reuck  
[redacted]

Sent from my iPhone

FW: NOTICE OF THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND A



Melanie Koen  
To luanne@sesc.net

Reply Reply All Forward

Mon 2024/10/14 10:57

You forwarded this message on 2024/10/14 12:22.

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

PV : PRE-APPLICATION BASIC ASSESSMENT REPORT SEWAGE PUMP STATION, HEROLDS BAY, WESTERN CAPE PROVINCE



Philip Vermeulen  
To luanne@sesc.net; michael@sesc.net  
Cc

Reply Reply All Forward

Mon 2024/10/14 11:51

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.

Mooi loop

Philip Vermeulen

RE: REMINDER: NOTICE OF THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION



JC  
To luanne@sesc.net  
Cc

Reply Reply All Forward

Tue 2024/10/15 08:09

Morning Luanne . As an effective party we would like to comment and we will do so after our meeting tomorrow with the Municipal and appointed engineer firms representatives on this project .

Regards

Joseph

proposed upgrading of the Herolds Bay sewage pump station.



Jean Ann Coldrey  
To luanne@sesc.net

Reply Reply All Forward ...

Tue 2024/10/15 12:12

You forwarded this message on 2024/10/15 12:15.

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.

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 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.

regards Jean Coldrey

Application for the submission of a property environmental study for comment - App No: 2024-09-0100



Application Manager  
To luanne@sesc.net; michael@sesc.net;

Reply Reply All Forward ...

Wed 2024/10/16 08:22

Follow up.  
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Dear Sharples Environmental Services

The message below refers to your application for the submission of a property environmental study for comment (Application No - 2024-09-0100) submitted to the Western Cape Government on 2024/09/11:

**Properties related to the application:**

- Portion 0 of Farm BRAKFONTEIN COAST 237, GEORGE
- Portion 10 of Farm BRAKFONTEIN 236, GEORGE
- Portion 35 of Farm BRAKFONTEIN 236 GEORGE
- Portion 0 of Farm BRAKFONTEIN COAST 237, GEORGE
- Portion 0 of Farm BRAKFONTEIN 236, GEORGE
- Erf 113 HEROLDS BAY, GEORGE
- Portion 0 of Farm BRAKFONTEIN 236, GEORGE
- Portion 37 of Farm BRAKFONTEIN 236, GEORGE
- Erf 95 HEROLDS BAY, GEORGE
- Portion 0 of Farm BRAKFONTEIN 236, GEORGE
- Erf 110 HEROLDS BAY, GEORGE
- Erf 116, HEROLDS BAY

**Supporting documents submitted with the application:**

- Application Cover Letter - (email correspondence.pdf)
- Basic Assessment Report - (Herolds-Bay-Pump-Station-and-Pipeline-Pre-App-SAR-2.pdf)
- Site Layout Plan - (Appendix-A3-Map-with-GPS-co-ordinates.pdf)
- Application Motivation - (Appendix-L-Draft-Design-Report.pdf)
- Site Layout Plan - (Appendix-A1-Locality-Map-1.pdf)
- Site Development Plan - (Appendix-B1-SDP.pdf)

The matter is receiving attention, and further communication will be addressed to you as soon as circumstances permit.

Best Regards,  
Western Cape Government

RE: Application for the submission of a property environmental study for comment - App No: 2024-09-0100



Vanessa Stoffels [redacted]  
To luanne@sesc.net; michael@sesc.net; [redacted]

[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Wed 2024/10/16 08:30

This message is part of a tracked conversation. Click here to find all related messages or to open the original flagged message.  
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

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.

Kind Regards

**Vanessa Stoffels**  
Road Use Management  
Chief Directorate Road Planning, Roads Branch  
Department of Infrastructure  
Western Cape Government  
Tel: 021 483 4669

The Box 24<sup>th</sup> Floor, 9 Lower Burg Street, Cape Town: PO Box 2603, Cape Town 8000

Email: [redacted]  
Website: [www.westerncape.gov.za](http://www.westerncape.gov.za)  
Road Network Information System: <http://mis.westerncape.gov.za>

Be 110% Green. Read from the screen.



Objection to proposed construction of sewerage pump station



Erika Kok [redacted]  
To luanne@sesc.net; [redacted]

[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Wed 2024/10/16 14:35

Good day

Careful consideration and proper public participation is essential before embarking on a project of this scale.  
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.  
Noise is a real threat, and by virtue of its function, so is smell.  
The scale of the project is huge and intrusive.  
Nearby property owners face a VERY REAL CONCERN.

Regards  
Erika Kok  
[redacted]

Sent from Erika's iPad

RE: NOTICE OF THE PRE-APPLICATION BASIC ASSESSMENT REPORT FORPROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND ...

 OCEIA [redacted]  
To luanne@sesc.net  
Cc Tabisile Mhlana

 Reply  Reply All  Forward 

Thu 2024/10/17 22:28

 Follow up.  
You replied to this message on 2024/10/23 08:17.

Dear Luanne,


Thank you for sharing the report with the Branch Oceans and Coasts. Unfortunately, due to previously received EIA reports this Branch can't 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 24<sup>th</sup> or 25<sup>th</sup> of October 2024 as we will be in the Garden Route that week.

Kind Regards

**Tabisile Mhlana**  
**Dept, Forestry, Fisheries & the Environment**  
**Oceans And Coasts -**  
**Coastal Development & Protection.**  
Tel: [redacted]  
Cell: [redacted]  
Email: [redacted]

RE: REMINDER: NOTICE OF THE PRE-APPLICATION BASIC ASSESSMENT REPORT FORPROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STA...

 Aviation Environmental Compliance [redacted]  
To luanne@sesc.net  
Cc [redacted]

 Reply  Reply All  Forward 

Fri 2024/10/18 09:55

Good day,

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: [www.caa.co.za/industryinformation/obstacles/](http://www.caa.co.za/industryinformation/obstacles/). The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: [www.caa.co.za](http://www.caa.co.za). You are highly advised to notify George Airport regarding the proposed project for their comments.

Kind regards

**Nrateng Mashiloane**  
**Aviation Environmental Compliance Department**  
**Aviation Safety Infrastructure (ASI)- Aviation Environmental Compliance**  
Tel: +27 11 545 1199 | Fax: +27 11 545 1282 Email: [redacted] [www.caa.co.za](http://www.caa.co.za)  
Follow us on:      | Subscribe to:  SKYwatch



Report fraud and corruption: 0800 204 911 | [sacaa@thehotline.co.za](mailto:sacaa@thehotline.co.za) | SMS 30916

**Confidentiality and Disclaimer Notice:** This email contains the South African Civil Aviation Authority (SACAA) confidential information intended only for the person to whom it is addressed and access to this e-mail by anyone else is unauthorized. Any recipient who is not a named addressee is not entitled to read the rest of the email or disclose its contents to any person or take copies. An incorrect addressee is requested to notify SACAA immediately by return email. Whilst all reasonable steps are taken to ensure the accuracy and integrity of information and data transmitted electronically and to preserve the confidentiality thereof, no liability or responsibility whatsoever is accepted if information or data is, for whatever reason, corrupted or does not reach its intended destination. In the event that this e-mail is of a personal nature and not business related, the recipient must note that this e-mail is not authorised by, or sent on behalf of the senders employer.

## Sewerage pump - Herold's Bay




Anna van Heerden

To Iuanne@sesc.net

Cc Ken Field

↩ Reply   ↶ Reply All   → Forward   ⋮

Fri 2024/10/18 18:17

 You replied to this message on 2024/10/21 13:10.

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 pump station on Skimmelkrans Road in Herold's Bay. Please take into consideration the following matters:

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.
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 home-owners' property will devalue with immediate effect. Moving the pump to a remote area will benefit everyone and uplift the community as a whole.
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.
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 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.
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 Skimmelkrans 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.

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.

Vriendelike groete

Kind regards

Anna van Heerden

Comment from Ken Field.




Part 1 of 3.

RE: REMINDER: NOTICE OF THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STA...




Ken Field

To Iuanne@sesc.net; Melanie Geyer; Browen Johnson

 Reply  Reply All  Forward 

Sun 2024/10/20 21:55

 You replied to this message on 2024/10/21 13:03.

Good afternoon Luanne,

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.

The following matters were raised;

1. A presentation on the reason for the upgrades and the redesign of the Herolds Bay sewage reticulation was done.
2. The positioning of the new pump station and the positioning of the rising main to the evaporation dams
3. Construction of the emergency tank adjacent to pump station 1

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.

After much discussion three areas of concern were raised as problematic

- The position of pump station 4
- The size and design of pump station 4
- The laying of the rising main from pump station 4
- The positioning of the rising main from pump station 1

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 therefor a containing wall is not possible to be constructed.

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.

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.

Part 2 of 3.

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.

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.

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.

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.

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.

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 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.

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.

Attendees at the meeting on the 18<sup>th</sup> October 2024 at 15h00 at [REDACTED] Herolds Bay

D de Villiers [REDACTED]

H Kriel [REDACTED]

A J van Heerden [REDACTED]

M C Scholtz [REDACTED]

Part 3 of 3.

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]

Many thanks for the opportunity to put forward our concerns

Kind regards

Ken Field

Chair Person

HBRPA and Ward Committee Member