

**GEORGE****TEL:** +27 (0) 44 873 4923 **FAX:** +27 (0) 44 874 5953**EMAIL:** info@sesc.net **WEBSITE:** www.sesc.net**ADDRESS:** Unit 17 Cathedral Square,
Cathedral Street, George, 6530**PO BOX:** 9087, George, 6530**CAPE TOWN****TEL:** +27 (0) 21 554 5195 **FAX:** +27 (0) 86 575 2869**EMAIL:** betsy@sesc.net **WEBSITE:** www.sesc.net**ADDRESS:** Tableview, Cape Town, 7441**PO BOX:** 443, Milnerton, 7435**IMPORTANT NOTICE**

This project has required extensive time and collaboration, drawing on the expertise of engineers, environmental assessment practitioners, municipal officials, multiple SACNASP registered specialists and multiple state departments to carefully investigate and consider alternatives and identify the most practical, sustainable options to move forward.

This project has taken years to reach its current stage. Alternatives were carefully investigated to ensure that the most practical and sustainable options could be presented in the Basic Assessment Report. Importantly, comments received during the public participation process were not only acknowledged but carefully considered, ensuring that Interested and Affected Parties' input meaningfully shaped the outcomes presented in the reports. The years it's taken to reach this stage reflects both the challenges of the work and the commitment to finding solutions that are not only technically feasible but also environmentally responsible and the best option to ensure reliable services, improve the current sanitation services and create better living standards for the residents of Herold's Bay.

To support this, a wide range of specialist assessments were undertaken, including:

- Aquatic Biodiversity Assessment
- Terrestrial Faunal and Avifaunal Species Impact Assessment
- Heritage Statement
- Groundwater Impact Assessment
- Botanical Impact Assessment
- Engineering Design Report

Each of these inputs was essential in building a complete picture of the site and its potential impacts. In addition, multiple departments were formally informed and invited to provide comments, ensuring that all relevant authorities had the opportunity to contribute to the process and guide it toward compliance and best practice.

This application represents the commitment to improving essential services in Herold's Bay, with a clear focus on preventing the sewerage spills and surcharges into the ocean. The proposed development, once completed, will have a positive impact on people's health and well-being by increasing the resilience of the sewerage infrastructure.

Kind regards,

Michael Bennett*Environmental Assessment Practitioner*

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- Environmental Impact Assessments • Basic Assessments • Environmental Management Planning
 - Environmental Control & Monitoring • Water Use License Applications • Aquatic Assessments




COMMENTS AND RESPONSE REPORT

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, GEORGE MUNICIPALITY, WESTERN CAPE

| COMMENTS ON THE PRE/APPLICATION BASIC ASSESSMENT REPORT | | | |
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| COMMENT | NAME/ORGANISATION | RESPONSE | # |
| <p>The abovementioned document received by the Directorate: Development Management (Region 3), hereinafter referred to as "this Directorate" via electronic mail on 18 September 2024 refers.</p> <p>2. This Directorate reviewed the documents and comment as follows:</p> <p>2.1. It is noted from the "Construction of a New Sewage Pumpstation and Rising Main in Herolds Bay, Western Cape, Specialist Aquatic Assessment Dated: 13 May 2024", that the watercourse adjacent to the new pumpstation and rising main is a non-perennial watercourse which has been moderately modified. Please obtain comments from Breede-Olifants Catchment Management Agency to confirm this statement. Furthermore, confirmation from BOCMA is required to confirm the applicability of the National Water Act.</p> | <p>Dorien Werth</p> <p>Department of Environmental Affairs and Development Planning</p> <p>7 November 2024</p> | <p>Please refer to comment 15 below.</p> | 1 |
| <p>2.2. The Botanical Study, Proposed upgrading of the Herold's Bay pump station and sewer pipelines: Dated March 2024. The report indicated that a 30m wide corridor will be required for the installation of the pipelines. Please provide more clarity on the need and desirability of the proposed 30m wide corridor that will be required for the installation and maintenance.</p> | | <p>The exact location of the pipeline is still undetermined. It is a knowledgeable assumption that the existing pipeline is located within the servitude shown in the image below. The existing servitude is 4m in width and insufficient to accommodate the new pipeline which will be place parallel to the existing pipeline. Accordingly, an additional 4m servitude north to the existing servitude will have to be applied for. The exact location of the pipeline will only be discovered during the construction phase and workers will need a corridor to move around in to search for the pipeline. Additional space next to the pipeline is also needed for labourers and vehicles to work in.</p> | 2 |


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| | | <p>The 30m corridor is not the same as the disturbance area of 10m to install the pipe but rather for that 10m disturbance area to have the flexibility to shift within the 30m corridor. This is just a precaution in the event that the old data is incorrect and the existing pipe is not located within the servitude.</p>  <p style="text-align: center;"><i>Figure 1: Current Servitude</i></p> | |
| <p>2.3. Further to the above please provide a detailed map for the proposal inclusive of the maintenance road and working footprint.</p> | | <p>The road that will be used to access the pipeline will be rehabbed after construction and will not be used for maintenance purposes.</p> | 3 |
| <p>2.4. According to the Botanical report and relevant aerial imagery, which were reviewed by this Directorate, it is noted that the proposed development footprint will be within a Critically Endangered and Endangered Ecosystems, namely Garden Route Granite fynbos and Groot Brak Dune Strandveld.</p> | | <p>CapeNature have not commented on the Pre-Application BAR after several reminder emails. They are in the I&AP list and will be notified again during the next round of public participation. Every effort has and will be made to obtain comments from CapeNature, however in term of the NEMA EIA Regulation 3(4) states: "When a State department is requested to comment in terms of these Regulations, such State department must submit its comments in writing within 30 days from the date on which it was requested to submit comments and if such State department fails to submit</p> | 4 |

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| <p>Please obtain comments from Cape Nature on the proposal and include these comments in the Basic Assessment report.</p> | | <p>comments within such 30 days, it will be regarded that such State department has no comments."</p> | |
| <p>2.5. It is noted that the developed is proposed on a site with steep slopes, please provide a detailed map of the proposed development with the gradient of the site.</p> | | <p>Please refer to Figure 3-1 of the Engineering Report.</p>  | 5 |
| <p>3. This Directorate awaits the submission of the application for Environmental Authorisation. 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.</p> | | <p>This is understood.</p> | 6 |
| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>Apologies for the delay in response, we have been out on site. We'll comment during the next phase PPP – please keep us as an I&AP.</p> | <p>Mercia Liddle Environmental Officer: Coastal Management</p> | <p>As an applicable authority, you are automatically registered as an I&AP and will be notified during the next round of public participation.</p> | 7 |

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| | <p>Department of Environmental Affairs and Development Planning Western Cape Government</p> <p>31 October 2024</p> | | |
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| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>The matter above has reference.</p> <p>Heritage Western Cape is in receipt of the above matter received. This matter was discussed at the Heritage Officers meeting held on 22 April 2024.</p> <p>You are hereby notified that, since there is no reason to believe that the proposed upgrading of the Herold's Bay Pump Station and Associated Rising Main As Well As The Development Of New Associated Infrastructure, On Re Farm 236 Brakfontein, Farm 10/236 Brakfontein, Re Farm 237, Erf 116, Erf 113, Remainder Of 95, Portion 37 Of Farm 236, Portion 35 Of Farm 236 And Portion 36 Of Farm 236, Herold's Bay, George will impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required. HWC Chance Find Producer to be included in the environmental authorization.</p> <p>However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the</p> | <p>Stephanie Barnardt</p> <p>Heritage Western Cape</p> <p>24 April 2024</p> | <p>Thank you for the confirmation.</p> | 8 |

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| <p>activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay.</p> <p>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.</p> <p>Should you have any further queries, please contact the official above and quote the case number.</p> | | | |
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| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>The Directorate: Pollution and Chemicals Management (D: PCM) acknowledges receipt of the Draft Basic Assessment Report (DBAR) on 12 September 2024. Please find comment from the D: PCM as follows:</p> <p>1. With reference to pump station 1 (PS1) and associated emergency storage tank and sump, it is mentioned on page 15 of 119 of the DBAR that "All the access points will be covered by removable precast concrete panels or hinged access covers. These covers are designed to minimize the airflow in and out to reduce odour issues. Access manholes will be provided for entry. The access cover will be too heavy for a single person to open and will require mechanical hoisting to reduce the possibility of unplanned entry." In addition to these access points restricting unauthorized access and controlling odour, they should also be designed to restrict seawater ingress during high tides, spring</p> | <p>Gunther Frantz Department of Environmental Affairs and Development Planning Directorate: Pollution and Chemicals Management 18 October 2024</p> | <p>Pump station 1 is an existing structure that has withstood storm surges in the past. The proposal will further improve the structure's ability to withstand future storm surges. The existing PS1 is constructed above the high and spring tide marks.</p> <p>Designs in place to further limit seawater ingress into PS1:</p> <ul style="list-style-type: none"> • Double doors • Drainage points for seawater that does find its way into the pump station • Waterproof roof • Manholes and access points will be made watertight as far as reasonably possible <p>In the event that some seawater does ingress past the above measures, the internals of the facility are waterproof, and the seawater will just be pumped up to the WWTW.</p> | 9 |

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| <p>tides or storm surges caused by extreme weather events.</p> | | | |
| <p>2. In addition to the above, the D: PCM recommends that backup generator/s at PS1 also be protected against extreme ocean tidal or storm surge events, to prevent diesel spillages from generator fuel tanks.</p> | | <p>The existing generator at PS1 will be removed and PS4 will have a generator that will supply power and back-up power to both PS1 and PS4, which will mitigate potential spillages.</p> | 10 |
| <p>3. Where backup generators housing diesel fuel tanks are situated on or next to the beachfront, appropriate design measures (i.e. bunds) should be incorporated to prevent diesel spillages from occurring during re-fueling events. Such measures should be incorporated during the upgrading of PS1.</p> | | <p>PS1 will not have a generator. Such measures will be incorporated during the construction of PS4.</p> | 11 |
| <p>4. The following general recommendations are provided to prevent and manage the potential contamination emanating from the site during the construction, operational and decommissioning phases and should be incorporated into the Environmental Management Programme (EMPr):</p> <p>4.1. The responsible management of hazardous chemicals should be practiced at all times and storage or handling of chemicals must not take place within close proximity of the beach area/littoral zone.</p> <p>4.2. The refuelling and/or repair of heavy earth moving vehicles should not take place within the beach area and should be conducted within a dedicated impervious area on site.</p> <p>4.3. All heavy earth-moving and transport vehicles must be in good working condition with no leaking hydrocarbon fuel, fluids or lubricant emanating from these vehicles.</p> | | <p>Thank you for the recommendations.</p> <p>4.1 This will be incorporated into the EMPr.</p> <p>4.2 This will be incorporated into the EMPr.</p> <p>4.3 Similar points present in the current EMPr:</p> <ul style="list-style-type: none"> • No machinery or vehicles with leaks are permitted to work in the watercourse; • Excavators and all other machinery and vehicles must be checked for oil and fuel leaks daily. No machinery or vehicles with leaks are permitted to work in the watercourse; No fuel storage, refuelling, vehicle maintenance or vehicle depots to be allowed within 30m of the banks of the watercourse. <p>4.4 Similar points present in the current EMPr:</p> <ul style="list-style-type: none"> • Storage vessels of hazardous substances must be situated in an impermeable bunded area large enough to accommodate at least 110% of the capacity of the tank in question. If plastic sheeting is used to line the bunded area, care must be taken | 12 |

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| <p>4.4. The storage of hazardous substances (i.e. petrol, diesel, and lubricants etc.) should be located on impervious bases within bunds (to accommodate 110% of the volume) to contain any fugitive spillages and/or leakages.</p> <p>4.5. No discharge of effluents or the wash water from cement batching areas should be allowed to enter the littoral zone/beach area. Runoff must be strictly controlled in the vicinity of any cement batching areas.</p> | | <p>to ensure it is not punctured in any way during the course of the construction period.</p> <ul style="list-style-type: none"> • Refuelling and fuel storage areas, and areas used for the servicing or parking of vehicles and machinery, must be located on impervious bases and should have bunds around them (sized to contain 110 % of the tank capacity) to contain any possible spills; <p>4.5 Similar point present in the current EMP:</p> <ul style="list-style-type: none"> • Cement/concrete used in the construction must not be mixed on bare ground or within the watercourse. An impermeable/bunded area must be established in such a way that cement slurry, runoff and cement water will be contained and will not flow into the surrounding environment, the stream or riparian zone or contaminate the soil; | |
| <p>Please direct any enquiries to Gunther Frantz should you require clarity on the comments provided.</p> <p>The Department reserves the right to revise or withdraw comments or request further information based on any information received.</p> | | <p>Thank you for your comments.</p> | <p>13</p> |
| <p>COMMENT</p> | <p>NAME/ORGANISATION</p> | <p>RESPONSE</p> | |
| <p>Reference is made to the above-mentioned Pre-Application Report made available to Breede-Olifants Catchment Management Agency (BOCMA) for comments.</p> <p>The following are BOCMA comments relation to the Pre-Application Basic Assessment Report for the proposed upgrading of the Herold's Bay sewages</p> | <p>SBONELO NDLOVU</p> <p>Breede-Olifants Catchment Agency</p> <p>4 October 2024</p> | <p>A Water Use License was obtained 5 September 2025. License number: 01/K30B/I/16508</p> | <p>14</p> |

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| <p>pump station and associated rising main, which should be adhered to:</p> | | | |
| <p>1. The proposed construction of a sewage pump station is located adjacent to a non-perennial stream and rising main crosses the non-perennial stream, a regulated area of a watercourse, thus it triggers water uses in terms of Section 21(c) & (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:</p> <p>a) The outer edge of the 1 in 100-year flood line and/or delineated riparian habitat, whichever is the greatest distance, measured from the middle of the watercourse of a river, spring, natural channel, lake or dam;</p> <p>(b) In the absence of a determined 100-year flood line or riparian area the area within 100m from the edge of a watercourse where the edge of the watercourse is the first identifiable annual bank fill flood bench (subject to compliance to section 144 of the Act); or,</p> <p>(c) A 500m radius from the delineated boundary (extent) of any wetland or pan.</p> | | <p>A Water Use License was obtained 5 September 2025. License number: 01/K30B/I/16508</p> | <p>15</p> |
| <p>1. The applicant is advised to take all reasonable measures to prevent movement of soil/debris and spillages of raw sewage into the non-perennial stream and estuary from the existing rising main during construction.</p> | | <p>The implementation of the EMPr will minimise negative impacts to the non-perennial river and estuary.</p> | <p>16</p> |

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| <p>2. Please note that no water shall be derived from the non-perennial drainage line and used during construction without prior approval by means of water use authorisation in terms of section 22 of the National Water Act, 1998 (Act No. 36 of 1998)</p> | | <p>This is understood.</p> | <p>17</p> |
| <p>3. If there will be storage of oil, diesel, hydraulic fluids and grease onsite used for heavy machinery, it is recommended that the storage 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.</p> | | <p>This is understood and mitigated in the EMPr. Please also refer to response 12 for additional information.</p> | <p>18</p> |
| <p>4. As required by section 22 of the National Water Act, 1998 (Act No. 36 of 1998), a Water Use Authorisation is required prior to commencement with any water use activity contemplated in section 21 of National Water Act. Moreover, commencement with any water use activity without an authorisation as required by section 22 of National Water Act constitutes an offence in terms of section 151 (1)(a) of the National Water Act. In terms of section 151 (2) of the National Water Act, any person who contravenes is guilty of an offence and liable, on first conviction to a fine or an imprisonment of a period not exceeding five years or both such fine and imprisonment.</p> | | <p>A Water Use License was obtained 5 September 2025. License number: 01/K30B/I/16508</p> | <p>19</p> |
| <p>5. In light of the above, you are advised that the onus remains with the property owner to adhere to the National Water Act, prior to commencement with any water use contemplated in section 21 of the National</p> | | <p>A Water Use License was obtained 5 September 2025. License number: 01/K30B/I/16508</p> | <p>20</p> |

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| <p>Water Act that associated with the proposed development.</p> | | | |
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| <p>6. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.</p> <p>7. The BOCMA office can be contacted for further information related to the requirement for, or the application for a Water Use Authorisation.</p> <p>8. Should you wish to apply for a water use authorisation for unregistered water uses triggered by the proposed activities, you may apply electronically by logging onto the Department of Water and Sanitation (DWS) website at http://www.dws.gov.za/e-WULAAS</p> <p>9. Should you have further enquiries the office can be contacted or alternatively contact Mr SI Ndlovu at the above-mentioned contact number or on sndluvo@bocma.co.za</p> | | <p>This is understood.</p> | <p>21</p> |
| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>Good day</p> <p>Careful consideration and proper public participation is essential before embarking on a project of this scale.</p> <p>A sewerage pump station abutting the brook will threaten water safety with the risk of contamination.</p> <p>Alternative sites in less obtrusive areas have to be explored.</p> <p>Noise is a real threat, and by virtue of its function, so is smell.</p> <p>The scale of the project is huge and intrusive.</p> | <p>Erika Kok Spekie Gericke crescent</p> <p>16 October 2024</p> | <p>We agree proper public consideration is a key component in the EIA process and it is being followed.</p> <p>Water safety and risk of contamination</p> <p>Please refer to page 96 and 97 of the BAR for a summary of the impacts post-mitigation.</p> <p>Aquatic impacts associated with the construction and operational phase of the pumpstation and rising main can be realistically mitigated to negligible and minor levels of impact significance.</p> | <p>22</p> |

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| <p>Nearby property owners face a VERY REAL CONCERN.</p> | | <p>Sewerage infrastructure must be maintained and periodically upgraded to ensure functionality and prevent breakdowns. If it is not upgraded and properly maintained sewage will spill into the water course and ocean, waterborne diseases (cholera, shigella, hepatitis and dysentery) could be spread due to dysfunctional maintenance, drinkable water could be contaminated, and the sewerage system of Herold's Bay could break down completely resulting in reduction in attractiveness of the bay to tourists (blue flag beach).</p> <p>The Municipality is implementing the project completely to improve the sanitation services provided to the community and to prevent spillage and surcharge into the ocean.</p> <p>Alternative sites for PS4 Alternative sites for PS4 have been investigated by the Municipality and consulting team. Page 61 of the BAR: According to the Engineers, the proposed site for PS4 is the only available space to implement the proposed upgrades to the existing sewerage infrastructure, it has the correct elevation and topography, is not densely vegetated and the closest available property to existing electricity and stormwater infrastructure.</p> <p>The only feasible option that will practically work to avoid multiple pump stations, which is not desirable or a practical solution due to the location and proximity to the beach, was on the current proposed location. In addition, Erf 116 belongs to the Municipality.</p> <p>Reducing the flow to the existing PS1 at the beach is a crucial part of improving the sewage system in Herold's Bay.</p> | |
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| | | <p>To achieve this, the diverted flow must be able to gravitate to the new PS4. The current location is the only available site where sewage can gravitate too freely.</p> <p>Noise The generator will be designed for low noise emission levels, due to pump station proximity within this residential area. It is recommended that noise levels of 60dBA be specified, measured at 7m, as per residential levels specified by the COCT.</p> <p>All designs will be done in accordance with the required regulations in terms of noise. Sound attenuation is being included in the design for generators and mechanical equipment to reduce noise and vibration.</p> <p>Odour All pump stations will be fitted with odour control units. The pump stations are currently fitted with sand traps and screens and no odours are currently being omitted from them, the upsizing of the pump station will not result in new odours emanating. The characteristics of the future sewage are also not changing indicating no "new" smells.</p> | |
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| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>It has come to my attention that the proposal for the new pump station is to be built in Skimmelkrans avenue alongside the river which runs into the sea. This is clearly not a suitable site re the unpleasant smells, the close proximity to residents and the fact that its next to the river.</p> | <p>Jean Coldrey Erf 32 15 October 2024</p> | <p>Please refer to the response above regarding odours, proximity to the river and locality of PS4.</p> <p>The municipality is aware and appreciative of the problems occurring at PS1, therefor aspects of this project regarding PS1 includes:</p> <ul style="list-style-type: none"> • Upgrade the existing pump station's civil infrastructure to handle 25L/s (ultimate design flow) | <p>23</p> |

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| <p>I live at the beach front very close to the existing pump house. This structure has been a disaster for many years i.e. with overflowing sewage into the sea, pumps malfunctioning and an awful stench at times. This has been an ongoing problem for many years. Both the existing structure should be moved, and the new proposed structure should be built out of sight and far from residents and property owners. The camp site has huge open areas or even adjacent to it. But as with everything related to the municipality it must always be the most convenient for them.</p> | | <p>and the mechanical operating capacity from 19 L/s to 25 L/s. The average flow under normal circumstances will be 10l/s, therefor the pump station's capacity will be reduced from 19l/s to 10l/s. Meaning that less sewage will be located at PS1.</p> <ul style="list-style-type: none"> • PS1's footprint/catchment is being reduced to only received sewage from the residential area along the beachfront. This will reduce problems experienced at PS1. Majority of the flow will be diverted to the new PS4 which will also be equipped with sufficient equipment to treat and deal sewage. • Refurbish the entire pump station building and equipment, including all mechanical, electrical and electronic equipment. All structures are to be stormproof as far as reasonably possible. Therefor addressing and fixing all current issues. <p>This design will reduce malodorous activity on the beach front, reduce the risk of spillages onto the beach, and efficient conveyance of sewage from the beach front. Should the pump station not be at the current and newly proposed location, the properties cannot be serviced by a water borne sewer system.</p> <p>Building the sewerage infrastructure out of sight and far from residents is not practical. Sewerage infrastructure exists throughout residential areas and form part of residential suburbs which as in this case requires pump stations. The topography of Herold's Bay does not permit sewerage infrastructure without implementing sewerage pump stations. In order to get sewerage from the lowest point (at the beach) to the WWTW located at the top of the hill</p> | |
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COMMENTS AND RESPONSE REPORT

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| | | <p>above Herold's Bay, a pump station is required. A pump station is therefore the only way to transport the sewage out of the area and will unfortunately be located in close proximity to the residential suburb houses. Without the infrastructure, the sewage network and system cannot function which extends all the way to each toilet in every house. It is not a matter of convenience or inconvenience, but what is practical, the best engineering solution provide the required basic services.</p> <p>PS1, located at the beach, cannot be relocated because the installed sewer reticulation system drains towards it. A conventional gravity sewer reticulation system is installed throughout Herold's Bay, with each house connected to this system, which ultimately drains into PS1. The gravity system conveys sewage to the lowest point, which, in the case of Herold's Bay and most coastal towns, is the beachfront where PS1 is located. The GM is aware of the issues at PS1, and as a result, this project has been initiated to improve the situation.</p> <p>To enhance the sewage system in Herold's Bay, it is essential to reduce the flow to the existing PS1 at the beach. This can be achieved by diverting some of the flow to the new pump station, PS4. PS4 needs to be strategically placed to ensure that sewage can flow into the PS by means of gravity. However, constructing a pump station at the campsite, as suggested, is not feasible because the campsite is situated at a higher elevation and the sewerage would be unable to gravitate into the PS. Therefore, the current location of PS4 remains the only viable site for the effective flow of sewage from the existing reticulation system</p> | |
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| COMMENT | NAME/ORGANISATION | RESPONSE | |
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| <p>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.</p> <p>Regards Joseph</p> | <p>Josheph</p> <p>15 October 2024</p> | <p>Thank you for meeting with us, the George Municipality and SMEC on the 16th of October 2024.</p> | 24 |
| <p>Goeiedag Lu-anne</p> <p>Baie dankie vir jou nota, waardeer.</p> <p>As die aandeelhouders 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.</p> | <p>Philip Vermeulen</p> <p>14 October 2024</p> | <p>Thank you for your comment.</p> | 25 |
| <p>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</p> | <p>Melanie Koen</p> <p>Department of Forestry and Fishery</p> <p>14 October 2024</p> | <p>Your requested extension is granted as we will accept your comments and take them into consideration whenever we receive them.</p> <p>Please also refer to the document sent to you via email on the 15th of October 2024.</p> | 26 |
| COMMENT | NAME/ORGANISATION | RESPONSE | |

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| <p>Dear Luanne</p> <p>SANRAL will not be affected by this development. SANRAL will only be affected if the pipeline crosses a National road</p> | <p>Nicole Abrahams</p> <p>SANRAL</p> <p>12 September 2024</p> | <p>Thank you for the confirmation.</p> | <p>27</p> |
| <p>COMMENT</p> | <p>NAME/ORGANISATION</p> | <p>RESPONSE</p> | |
| <p>Objection to the Proposed Construction of a Sewerage Pump Station</p> <p>I am writing to formally object to the proposed construction of a sewerage pump station across the road from my property at 37 Spekie Gericke, Herold's Bay. My objections are based on the following reasons:</p> <p>1. Environmental Impact: The construction and operation of a sewerage pump station pose significant risks to the local ecosystem, including potential pollution of nearby water sources and disruption of wildlife habitats.</p> | <p>Sharon de Reuck</p> <p>26 September 2024</p> | <p>Please refer to pages 96 and 97 of the BAR for a summary of the impacts post-mitigation. Please refer to response 14 for potential aquatic pollution risks.</p> <p>Not upgrading the pump stations and sewage system will also pose a significant risk to the local ecosystem.</p> <p>The central section of the pipeline footprint harbours the most intact habitats, intersecting intact Fynbos and Forest/Woodland habitats, with the western section of the pipeline intersecting the existing WWTP and the eastern section largely located within the existing residential area. Collectively, only a small part of the proposed footprint overlaps with intact natural habitats.</p> <p>The project footprint will be of a limited spatial extent and impacts will be of a localised and very short nature and will cease at the end of the construction phase. As such, this renders the entire proposed project footprint as developable from a faunal perspective.</p> <p>The EMPr also mitigates all impacts directly and indirectly relating to fauna on or around the site, such as a faunal and floral search and rescue before construction and rehabilitating the pipeline footprint post construction.</p> | <p>28</p> |

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| | | Please refer to the Terrestrial Faunal and Avifaunal Species Impact Assessment (Appendix G3) for more information. | |
| <p>2. Property Value Concerns: The presence of a sewerage pump station may negatively affect property values in the vicinity, including my own. Prospective buyers often seek to avoid areas with such infrastructure due to health and aesthetic concerns.</p> | | <p>The pump stations will be visible to the public and are located in high-trafficked areas at the entrance to town and at the beachfront, so it is of the utmost importance that the buildings are not only functional but also aesthetically pleasing. Architectural services have been acquired to enhance the aesthetic look of the new building and ensure it blends in with the existing surroundings of Herold's Bay.</p> <p>The proposed development, once completed, will have a positive impact on people's health and well-being by increasing the resilience of the sewerage infrastructure.</p> <p>The inverse is also applicable, it can enhance the liveability of the area with the upgrade of the sewerage system, the quality of life and prevent/minimise current issues experienced. The improvements made can also attract potential buyers or investors because people are willing to pay more for properties where there are reliable services, creating better living standards.</p> | 29 |
| <p>3. Health and Safety Risks: Sewerage facilities can produce unpleasant odors and may attract pests, creating a less desirable living environment. Additionally, there are potential health risks associated with any leakage or malfunction of the system.</p> | | <p>The proposed development, once completed, will have a positive impact on people's health and well-being by increasing the resilience of the sewerage infrastructure. The Municipality is implementing the project completely to improve the sanitation services provided to the community and to prevent spillage and surcharge onto the beach and ocean.</p> <p>PS1: The existing building will be refurbished and used to house control systems, isolation equipment and an odour control system. The municipality also performs frequent housekeeping and removes items that can attract pests. It</p> | 30 |

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| | | <p>should also be kept in mind that the sewerage system extends from the households that can also attract pests, these are not limited to the pump stations only.</p> <p>PS4: All works will be housed within the structure with an odour control facility.</p> <p>All pump stations will be fitted with odour control units. PS1 is currently fitted with sand traps and screens and no odours are currently being omitted from them, the upsizing of the pump stations will not result in new odours emanating.</p> <p>Please also refer to response 23 for additional information.</p> | |
| 4. Noise Pollution: The operational noise from the pump station could be disruptive to the peace and quiet of our residential area, impacting the quality of life for local residents. | | <p>PS4: The generator will be designed for low noise emission levels, due to pump station proximity within this residential area, it is recommended that noise levels of 60dBA be specified, measured at 7m, as per residential levels specified by the COCT.</p> <p>All designs will be done in accordance with the required regulations to noise. Sound attenuation is being included in the design for generators and mechanical equipment to reduce noise and vibration.</p> | 31 |
| 5. Increased Traffic and Construction Disruption: The construction phase will likely generate significant traffic and disturbances in the neighbourhood, affecting daily routines and safety. | | <p>Construction activities will only be undertaken during off season periods to mitigate the potential disruptions. Additionally, a traffic management plan will be compiled by the appointed contractor and will conform to all construction traffic safety regulations.</p> | 32 |
| I urge you to consider these points seriously and reconsider the proposed location for the sewerage pump station. I appreciate your attention to this matter and look forward to your response. | | <p>Thank you for your comments.</p> | 33 |
| COMMENT | NAME/ORGANISATION | RESPONSE | |

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| <p>Dear applicant</p> <p>Due to technical issues, we would like to request for an extension to provide our Branch's comments.</p> <p>Trust this is in order.</p> | <p>Vanessa Stoffels Road Use Management Chief Directorate Road Planning, Roads Branch Department of Infrastructure Western Cape Government</p> <p>16 October 2024</p> | <p>Your requested extension is granted as we will accept your comments and take them into consideration whenever we receive them.</p> | <p>34</p> |
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| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>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/. The list and contact details of the approved obstacles assessment services providers can be obtained from the CAA website: www.caa.co.za. You are highly advised to notify George Airport regarding the proposed project for their comments.</p> | <p>Nrateng Mashiloane</p> <p>Aviation Environmental Compliance Department</p> <p>18 October 2024</p> | <p>Thank you for the confirmation.</p> | <p>35</p> |
| COMMENT | NAME/ORGANISATION | RESPONSE | |

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| <p>Good day</p> <p>Objection to the Proposed Site for the Construction of a Sewerage Pump Station in Herold's Bay</p> <p>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:</p> <p>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.</p> <p>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.</p> <p>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</p> | <p>Anna van Heerden</p> <p>18 October 2024</p> | <ol style="list-style-type: none"> 1. Please refer to page 80 – 96 of the BAR. All impacts are partly or highly reversible. 2. Please refer to response 22 and 29. 3. Please refer to response 30 4. Please refer to response 22 and 31. 5. The sewer pipeline to PS4 is being installed as part of the upgrade of Roodraai Road. No disruption along Roodraai Road will result from this project. The sewer pipeline between PS1 and PS4 (Skimmelkrans Lane) will be installed within a defined working space and full road closures will not be permanently enforced. Traffic will be managed at all times with the approved traffic management plans in place. <p>In general, no construction will take place within the peak season.</p> <p>With regards to the installation along Spekie Gericke Drive, please refer to response 32.</p> | <p>36</p> |
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| <p>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.</p> <p>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.</p> <p>5. Increased Traffic and Construction Disruption: The construction phase will likely generate significant traffic and disturbances in the neighbourhood, affecting daily routines and safety. Please note that 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.</p> <p>I urge you to take note of these points and to seriously reconsider the proposed site for the sewerage pump station. I appreciate your attention to this matter and look forward to your response.</p> | | | |
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| COMMENT | NAME/ORGANISATION | RESPONSE | |
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| <p>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;</p> <ol style="list-style-type: none"> 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 | <p>Ken Field Chair Person HBRPA and Ward Committee Member</p> <p>20 October 2024</p> | | 37 |
| <p>Numerous questions as to the necessity for the upgrade and the layout were raised but once answered the overall agreement of the meeting was that the upgrade was necessary in order to prevent sewage spills which are regular occurrences on the beach due to the significant flows during the season as a result of the densification of the Bay Area.</p> <p>After much discussion three areas of concern were raised as problematic</p> <ul style="list-style-type: none"> • 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 | | | |

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| <p>There were serious objections to the position of the pump station by the residents whose properties are located in that area from an environmental concern as it is placed close to the river so that any overflow or spillage will end up on the beach as it is in a confined area and therefor a containing wall is not possible to be constructed.</p> | | <p>Please refer to pages 80-96 of the BAR for all impacts associated with this project and their mitigation measures</p> <p>An emergency storage tank is proposed under the parking area adjacent to PS1, in the event of failure or breakdown the sewage will flow into the storage tank to prevent spillages onto the beach or river.</p> | 38 |
| <p>As it is planned to construct a screening plant prior to the delivery of the raw sewage to the holding tank it will be necessary to clear any detritus on a regular basis. This process is normally done manually and it is not clear how this is to be handled which concerned the meeting as if it is not properly handled could result in unacceptable odours and spillage in the close vicinity of residential dwellings.</p> | | <p>Consideration has been made to the pump station's design and layout for the installation of automated front rake screens, screening conveyors, washer-compactors, and associated equipment. Thus, the manual hand rake screens being installed in this contract can be removed and replaced with the automated screens and associated equipment and controls without any major changes to the structure of the screening channels.</p> <p>The automated screens, screw conveyor and washer compactors will be installed on the first floor and discharge the screenings down a chute into the skip located on the ground floor. The municipality thus have the option to install automated mechanical front rake screens including all the ancillary equipment in the future.</p> <p>All pump stations will be fitted with odour control units. The pump stations are currently fitted with sand traps and screens and no odours are currently being omitted from them, the upsizing of the pump stations will not result in new odours emanating.</p> | 39 |

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| <p>Sewage pump stations handling raw sewage with solids are normally noisy units which concerns the residents living in the close vicinity of the station. What ameliorating designs have been used to soften the effect of this excessive constant noise.</p> | | <p>Please refer to response 22 and 31.</p> | <p>40</p> |
| <p>A question was asked as to whether any other position has been considered for the pump station. Mention was made that there was another possible area away from the residential area that should be investigated.</p> | | <p>Please refer to response 22 and 23.</p> | <p>41</p> |
| <p>The meeting was astounded at the required size of the building at four stories and 22 meters length as this would be right in the sight of visitors entering Herolds Bay. Suggestions were that the building be separated into two units, possibly with the screening and pumping separated and also located at another position.</p> | | <p>This will not be practical because of the land available. The Municipality is cognisant of the building size and the space in which it will be constructed and have employed architects as part of the engineering team to create a space that is aesthetically pleasing. The building height is required to accommodate the mechanical and electrical equipment, and the reduction of the footprint will be considered where possible. The total building height currently stands at 10m above ground. The 12m was the complete building height, of which 2.5m will be constructed below ground level.</p> <p>In addition, the building design from an architectural aspect also considers the surrounding environment and residential homes to ensure integration.</p> | <p>42</p> |
| <p>The installation of the rising main in Spekie Geriche was of great concern as it would preclude residents using the road for some time, the problem being that there are a number of permanent residents who use the road daily to commute to work. The question is could the old pipeline not be used and if not, could another route be investigated.</p> | | <p>The existing pipeline is too small and must be upgraded to a larger diameter. The construction sequence is carefully being looked at to limit disruptions to residents. Excavation lengths will also be kept to a minimum, no excavations will be left open that will prevent access to properties.</p> | <p>43</p> |

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| <p>Consideration needs to be given to the requirement for emergency vehicles to use the road in an emergency and the use of the road by heavy duty vehicles.</p> | | <p>This is noted.</p> | <p>44</p> |
| <p>Concern was also raised regarding the raising main between pump station 1 and station 4 as to the positioning of the column on the curve above the bridge and the possibility of a breakage. 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.</p> <p>It is proposed that the chairman of the ratepayers and two representatives meet with your team to further discuss the proposals as we are aware that this project is of absolute necessity for the upliftment of Herolds Bay.</p> | | <p>According to the George Municipality: The construction works sequence is budget dependent and only meaningful/practical phases can be implemented to avoid new infrastructure installed that cannot be used. Consideration has been given to a phased approach if the full budget for all upgrades is not available. Once the detail design is complete the construction sequences will be relooked at to align with the budget. The ablution facilities are not civil engineering infrastructure and is not funded by this project. The relevant Directorate must be approached for the upgrading of the ablution facilities. The increase in the wall is also not related to the sewage infrastructure upgrade, but the comment/concern is noted.</p> <p>A meeting will be arranged at a time convenient to all.</p> | <p>45</p> |
| <p>Attendees at the meeting on the 18th October 2024 at 15h00 at 14 Skimmelkrans St Herolds Bay</p> <p>D de Villiers 21 Beach Road H Kriel 4 Gange St Representing 60 & 55 Speikie Geriche A J van Heerden Rooidraai Road M C Scholtz Rooidraai Road S Slabber 5 Gus Meyer Ave S A de Reuck 37 Speikie Geriche J A Coldrey 14 Skimmelkrans St</p> | | <p>Thank you for providing the names of I&AP's.</p> | <p>46</p> |

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| <p>N Crawley Ward Committee N van Wyk Skimmelkrans St J Oosthuisen Gus Mayer P Hoole Gus Meyer D de Reuck Beach Road J N Joubert Rooidraai Road K E Field Ratepayers and Ward Committee</p> | | | |
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| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>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.</p> <p>Considering that this is a pre-application will you kindly give us more time to coordinate comments within the Branch in the next two weeks and accommodate our request to conduct a site inspection on the 24th or 25th of October 2024 as we will be in the Garden Route that week.</p> | <p>Tabisile Mhlana Dept, Forestry, Fisheries & the Environment Oceans And Coasts - Coastal Development & Protection.</p> <p>18 October 2024</p> | <p>Your requested extension is granted as we will accept your comments and take them into consideration whenever we receive them. An attempt to arrange the site visit was unsuccessful with no response received to our email to arrange for an alternative site visit date.</p> | <p>47</p> |
| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>COMMENTS ON PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED RISING MAIN AND THE DEVELOPMENT OF NEW ASSOCIATED INFRASTRUCTURE, ON ERF 116, ERF 110, ERF 113, REMAINDER OF ERF 95, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 10, 35 AND 37 OF FARM BRAKFRONTEIN NO. 236, HEROLDS BAY:</p> | <p>Melanie Koen AREA MANAGER FORESTRY: WESTERN CAPE Department of Forestry, Fisheries and the Environment</p> | | <p>48</p> |

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| <p>1 Forestry is responsible for the implementation and the enforcement of the National Forest Act (NFA), Act 84 of 1998 as amended and the National Veld and Forest Fire Act, Act 101 of 1998 as amended (NVFFA). Thank you for giving Forestry this opportunity to comment on above application.</p> | <p>3 December 2024</p> | | |
| <p>Forestry studied the supporting documents for the above-mentioned application and the following points related to Forestry's mandate i.e. the implementation of the NFA are applicable a. Forestry has no objection on above proposed sewage pump station 1 and associated rising main upgrade</p> | | | <p>49</p> |
| <p>b. Forestry request that off-sets be looked into where protected/ indigenous trees will be affected- upon NFA licence application.</p> | | <p>Offsets will not be required.</p> <p>According to the Principles for biodiversity offsetting as set out in the National Biodiversity Offset Guideline of 2023, in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998): "Biodiversity offsets must only be considered once all the foregoing steps in the mitigation hierarchy have been considered to their full and feasible extent. The mitigation hierarchy dictates that the degradation and loss of biodiversity must be avoided, or where impacts cannot altogether be avoided, they should be minimised, and the area adversely impacted by relevant activity should be rehabilitated. When, after taking the aforementioned mitigation measures, there are likely to be residual negative impacts on biodiversity of medium to high significance, they must be offset".</p> <p>According to the Botanical Impact Assessment:</p> | <p>50</p> |

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| | | <p>"The affected vegetation has been identified as Garden Route Granite Fynbos and Groot Brak Dune Strandveld. Both are currently listed as Critically Endangered. Given the linear nature of the project and the somewhat degraded state of the granite fynbos, the impact on terrestrial biodiversity is of medium-low concern. It is therefore recommended that the project (as currently presented) be approved, but subject to the proposed mitigation measures."</p> <p>All botanical impacts after mitigation are low. Please refer to Appendix G1.</p> <p>According to the Terrestrial Faunal and Avifaunal Species Impact Assessment: "To this end, development under the preferred Alternative 2 will be acceptable from a faunal perspective as direct impacts on the receiving environment will result in only minor to insignificant loss or deterioration of faunal biodiversity in the receiving environment over the short term, and indirect impacts may be effectively managed over the long term. To this end, the development layout under Alternative 2 is supported from a faunal biodiversity perspective."</p> <p>All impacts after mitigation are Low to Negligible. Please refer to Appendix G3.</p> | |
| c. Indigenous Forest as well as protected trees are protected under the National Forest Act (NFA) (Act No. 84 of 1998) as amended. | | This is understood | 51 |
| d. This letter is not a NFA licence. | | This is understood | 52 |
| 3 Forestry reserves the right to revise initial comment based on any additional information that may be received | | | 53 |

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| COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT | | | |
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| COMMENT | NAME/ORGANISATION | RESPONSE | |
| 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. | Sharon de Reuck 11 February 2026 | The notification email you are referring to is to notify you of the second BAR commenting period for the proposed upgrades. A follow up meeting has been setup with the municipality; this does serve more to provide clarity regarding planning undertaken outside of this NEMA BAR process | 54 |
| 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. | | Your previous objection still stands. | 55 |
| @ Ken Field what was the outcome of our meeting held in March 2025 with the Council and did you receive a reply from them? | | A meeting with representatives of Herold's Bay was held on 07 April 2026 and feedback on the alternative locations as proposed by the residents. After investigation by the George Municipality and SMEC all alternatives provided was deemed not feasible alternatives and cannot be considered further. Minutes of the meeting have been drafted and was shared with the attendees. The residents requested one other alternative to be investigated, Alternative C (pipeline through hill and draining to the back of the camp site) and feedback provided. The Municipality will provide feedback on the viability in due course. | 56 |
| COMMENT | NAME/ORGANISATION | RESPONSE | |
| 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. | Nicolette Prinsloo 15 February 2026 | | 57 |
| 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 | | The engineering report contains more information on the processes. Sewerage gravitates down to PS1 and is then pumped up to the WWTW. This process will not be changed | 58 |

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| <p>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.</p> | | <p>by the proposal, an additional PS4 will be constructed to assist the process.</p> <p>The upgrading of the bulk sewerage system and pump stations are not permitting more flow to be pumped to the WWTW but upgrading the overall system. The upgrading of the Herold's Bay WWTW is being looked at concurrently.</p> | |
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| <p>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?</p> | | <p>As mentioned in the aquatic impact assessment: "No activity may take place within a watercourse unless it is authorised by the Department of Water and Sanitation (DWS)."</p> <p>A water use license was obtained; therefore, it is allowed. Please see Appendix M</p> | 59 |
| <p>3. The proposed building still looks like a monstrosity right at the entry of the town.</p> | | <p>Measures have been implemented to mitigate the potential visuals of the pumpstation. One must remember that service infrastructure is essential in the functioning of a suburb. An architectural design of the pump station has been performed to not diminish the area. Also refer to responses #29 and #42.</p> | 60 |
| <p>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.</p> | | <p>Please refer to response #29 and #31.</p> | 61 |
| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>The abovementioned BAR was recently brought under my attention and I would like us to be registered as an IAP.</p> <p>I represent Fynbos Eiendomme (Pty) Ltd., the new owner of the consolidated portions 7 and 13 of Farm Brakfontein 236, registered as Farm 386 "Vrij</p> | <p>Jan Vreken</p> <p>Director: Fynbos Eiendomme (PTY) Ltd</p> <p>16 February 2026</p> | <p>The EAP responded to this email on 18 February 2026, confirming receipt of the email and registration of the I&AP.</p> | 62 |

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| Heerlikheid" (deed of servitude / proof of ownership attached). | | | |
| I include my ID pre-emptively. | | | |
| I'm just following up on the below. Please confirm receipt of my email and registration as an IAP. | 18 February 2026 | | |
| 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. | 19 February 2026 | The pre-application BAR was sent to the I&AP on 19 February 2026. | 63 |
| COMMENT | NAME/ORGANISATION | RESPONSE | |
| 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 BRAKFORTEIN NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE. | Ben-Jon Dreyer Protected Area Programme Manager: Arid: Landscapes Wilderness Foundation Africa 24 February 2026 | Thank you for registering as an I&AP. | 64 |
| COMMENT | NAME/ORGANISATION | RESPONSE | |
| 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: | Luisa van der Linde 27 February 2026 | | 65 |

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| 1. Waar presies is stasie 1 geleë? (op 'n kaart van Heroldsbaai) | | Please refer to Appendix A1. | 66 |
| 2. Waar gaan die nuwe infrastruktuur presies opgerig word? | | Please refer to Appendix A1 and B1 and Section B of the BAR. | 67 |
| 3. Wanneer gaan die proses begin en hoe lank gaan dit waarskynlik wees? | | According to the BAR, construction expenditure is anticipated in the 2027/28 financial year. It is anticipated that construction will take place over a period of 3 years, depending on available budget. Construction may also take place in phases, which may impact the total duration to finalise the upgrade to all infrastructure. | 68 |
| 4. Gaan daar enige uitdagings in terme van geraas in die omgewing wees? | | Please refer to response #31. | 69 |
| 5. Gaan daar enige uitdagings in terme van reuk/tydelike toilette/behuising naby die woonhuise in Gericke singel wees? | | <p>Please refer to response #22 for smell related queries. The EAP responded to the email on 5 March to ask for clarity on what is meant by temporary housing challenges but have not received a response.</p> <p>No temporary housing will be created to house construction workers; the contractor is responsible to obtain suitable housing for this staff during construction. Temporary toilets are required to service the construction team and will be placed in designated spots as per the ECO and OHS agents advise. Toilets are the responsibility of the contractor and will require regular servicing, the ECO and OHS agent will perform inspections and audits on these aspects as well to ensure compliance.</p> | 70 |
| 6. Gaan enige bestaande/nuwe strukture 'n invloed op die waarde van enige van die strandhuise reg langs Gericke singel hê? | | Please refer to response #29. | 71 |
| Baie dankie vir julle tyd en moeite. Ons sien uit om die antwoorde op hierdie vrae te ontvang. | | Thank you for your comments. | 72 |
| COMMENT | NAME/ORGANISATION | RESPONSE | |

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| <p>Please note that our previous comment still stands, no further action is required from heritage.</p> | <p>Stephanie-Anne Barnardt-Delport Heritage Officer (Archaeologist)</p> <p>Heritage Western Cape</p> <p>2 March 2026</p> | <p>Thank you for the confirmation.</p> | <p>73</p> |
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| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>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 wastewater 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 majority 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.</p> | <p>Ken Field</p> <p>4 March 2026</p> | <p>Refer to response #56.</p> | <p>74</p> |
| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>Thank you for the opportunity to review the documentation and to provide comments on the</p> | <p>Fynbos Eiendomme (Pty) Ltd.</p> | | <p>75</p> |

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| <p>proposed development and associated specialist studies.</p> <p>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.</p> <p>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.</p> | <p>13 March 2026</p> | | |
| <p>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</p> | | <p>At this stage the property is not formally declared as a nature reserve under NEM:PAA and therefore, in terms of the BAR process, it is not applicable.</p> <p>Please see CapeNature's comments below (#109 - #122).</p> <p>The installation of the pipeline will take place on Farm 386 and is a linear activity and according to the EIA Regulations (GNR 982 of 2014, as amended) Regulation 39: exception, does not require landowner consent for linear developments. Furthermore, the property information for the properties involved in this project was obtained via a PAIA application in 2024 and a different landowner was provided.</p> <p>Written consent from the management authority will be obtained if the reserve is declared before the activities are undertaken and construction activities will then have to comply with the Reserve management plan once approved. Currently this is not in place.</p> | <p>76</p> |

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| <p>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.</p> <p>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.</p> <p>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.</p> | | <p>If applicable at the time of undertaking the activity, all necessary approvals will be obtained.</p> <p>From the information that the George Municipality has available, a servitude is registered for the pipeline over portion 10 of 236 and farm 386. The servitude therefore requires extension to accommodate the new pipeline. Once the detail design is finalised, environmental authorisation is obtained, we will inform the property owner of the pipeline position and anticipated construction commencement date. The new servitude will only be registered once the pipeline has been constructed.</p> <p>Ito Clause 27 of the 2023 George Municipal Land-Use Planning Bylaw included below, services may be installed within subdivided properties:</p> | |
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| | | <p>27. Subsequent to the approval of an application for subdivision in terms of this By-law, the owner of any land unit originating from the subdivision must—</p> <p>(1) allow without compensation that the following be conveyed across his or her land unit in respect of other land units originating from the subdivision:</p> <ul style="list-style-type: none"> (i) gas mains; (ii) electricity cables; (iii) telephone cables; (iv) television cables; (v) other electronic infrastructure; (vi) main and other water pipes; (vii) foul sewers; (viii) storm-water pipes; and (ix) ditches and channels; <p>(2) allow the following on his or her land unit if considered necessary and in the manner and position as may be reasonably required by the Municipality:</p> <ul style="list-style-type: none"> (i) surface installations such as mini-substations; (ii) meter kiosks; and (iii) service pillars; <p>(3) allow access to the land unit at any reasonable time for the purpose of constructing, altering, removing or inspecting any works referred to in paragraph (a) or (b); and</p> <p>(4) receive material or permit excavation on the land unit as may be required to allow use of the full width of an abutting street and to provide a safe and proper slope to its bank where necessitated by differences between the level of the street as finally constructed and the level of the land unit unless he or she elects to build retaining walls to the satisfaction of and within a period to be determined by the Municipality.</p> <p><i>Note, with reference to farm portion/s, one needs to ensure that the portion does not represent the original un-subdivided portion of the farm.</i></p> | |
| <p>2. Screening Tool</p> <p>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.</p> | | <p>The 2023 Western Cape Biodiversity Spatial Plan (WC BSP) was formally adopted into law on the 13th of December 2024. The specialists' reports were compiled between October 2023 and September 2024. Therefore, at the time of compiling their reports the 2023 WCBSP was not applicable.</p> <p>However, we did generate a new screening tool report and only the agricultural theme's (not relevant to the proposal) sensitivity has changed, all other themes have remained the same.</p> | 77 |
| <p>3. Site Sensitivity Verification (SSV) Report</p> <p>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</p> | | <p>A Specialist Study Verification Report (SSVR) is not automatically required for a Basic Assessment Report (BAR). Under the National Environmental Management Act (NEMA) EIA Regulations, an SSVR is only required if the competent authority specifically requests it.</p> | 78 |

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| <p>additional clarity regarding the screening outcomes and the rationale for certain specialist studies, such as the socio-economic assessment, not being undertaken.</p> | | <p>The BAR does include Socio-economic aspects however specialists' input in this regard is not required for this proposal.</p> <p>A socio-economic specialist is usually warranted if: "The project changes how people live, work, move, or interact with their environment in a meaningful way."</p> | |
| <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p> | | <p>As mentioned in the BAR, alternative sites for the pumpstations were investigated but not feasible due to engineering and financial restraints, space and property ownership.</p> <p>The option to relocate the emergency storage tank was investigated. However, the risks associated with construction near the seawall are short-term in nature and can be effectively managed during construction. In contrast, the alternative options introduce longer-term operational and maintenance risks. The potential consequences, both direct and indirect, of these long-term risks were considered to outweigh the short-term construction risks of the primary location.</p> <p>Accordingly, it was concluded that the sewage pump station and emergency storage tank should remain at the primary location, adjacent to the existing pump station.</p> <p>At the meeting held on 07 April 2026, the Representatives of the Herold's Bay Ratepayers Association proposed alternative locations where PS4 could potentially be constructed. In response, SMEC, together with the George Municipality, undertook to investigate the feasibility of these alternative locations. It was concluded that the alternative locations are technically inferior to the planned location and presents increased construction, operational, and</p> | 79 |

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| <p>alignment of the pipeline is supported, and the pipeline should not be installed in areas where such vegetation occurs.</p> | | <p>maintenance risks, with no corresponding benefits. The planned site remains the preferred and more suitable position for the proposed pump station.</p> <p>Alternative pipeline routes were investigated on pages 65 – 70.</p> <p>As Farm 386 is not a nature reserve, the specialists have not assessed it as a nature reserve, however the classification of the site would not affect the specialists' assessment as they focused on what is actually on the site and the site conditions have been taken into account when assessing the proposal as a whole. All impacts and mitigation measures relating to the project can be found on pages 84 – 101 of the BAR. It includes construction and operational impacts and mitigation measures.</p> <p>While these species will be avoided as far as practically possible one must also take into account the limited ability to change the alignment of a pipeline of this nature. If any of these species are noted along the route and they cannot be avoided, they will be rescued and planted nearby. Search and rescue is a requirement in the EMPr</p> | |
| <p>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 m². 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 m² within CPP, Listing Notice 1 Activities</p> | | <p>This is correct, we cannot apply for an activity that will not be triggered. The EIA system is trigger-based, not voluntary and competent authorities will not include activities that will not be triggered by the proposal.</p> <p>Please refer to comment #102 and #103 from The Department of Environmental Affairs and Development Planning Biodiversity and Coastal Management.</p> | <p>80</p> |

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| <p>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 m²). 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.)</p> | | | |
| <p>6. Legislation, Management Plans and Frameworks The following matters require clarification or further consideration:</p> <ul style="list-style-type: none"> • 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 | | <ul style="list-style-type: none"> • No Intersections with EMF were found according to the 2022 and 2026 Screening Tool Report. • Refer to comment #104 • The 2023 Western Cape Biodiversity Spatial Plan (WC BSP) was formally adopted into law on the 13th of December 2024. The specialists' reports were compiled between October 2023 and September 2024. Therefore, at the time of compiling their reports the 2023 WCBSP was not applicable. • SANS 10103: 2008 will be referenced. • No confirmation of municipal bulk services capacity is required for this proposal. | 81 |



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| <p>(RLE) are used prior to submission of the Final BAR.</p> <ul style="list-style-type: none">• 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 | | | |
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| <p>7. Coastal and Marine Impacts, Climate Change and Storm Surges</p> <p>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.</p> <p>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.</p> <p>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.</p> | | <p>The proposed upgrades are only located on land and there is no direct construction or modification in the marine environment, therefore the impacts are terrestrial not marine. The potential impact (sewerage overflow onto the beach) is also an already recognized risk. This risk is being addressed through engineering and operational improvements. No new discharge points, pipelines or marine infrastructure are being introduced. Lastly, the project is focused on system reliability and failure prevention. The upgrades are designed to reduce the risk of sewerage overflow, not increase it. Therefore, the likelihood of new or additional marine impacts is negligible.</p> | 82 |
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| <p>8. Wastewater Treatment Works (WWTW) Capacity and Implications for Farm 386</p> <p>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.</p> <p>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.</p> <p>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?</p> <p>Reference must also be made in terms of possible risks to the nearby Maalgate River Estuary. (Refer to</p> | | <p>According to the Engineering report: The pump station was refurbished in 2004 and is the main sewage pump station in Herold's Bay, receiving all sewage gravity flows from the area and pumped flows from two smaller pump stations along the cove. The sewage is subsequently pumped to the Herold's Bay Wastewater Treatment Works (WWTW). The harsh operating conditions (highly corrosive environment and sand loading) result in high maintenance requirements and frequent breakdowns of operations of the Pump Station (PS1). The lack of critical spares and high variations in seasonal inflows compound the difficult operational situation. Based on the development plans received from the George Municipality, the sewage that this Pump Station will have to accommodate will increase to 52L/s to service the full developable area that drains to Herold's Bay, in and beyond the current urban edge. With the upgrade, the intention is to improve the service delivery and reduce the challenges that the George Municipality (GM) experiences with the pump station's operation.</p> <p>The upgrading of the bulk sewerage system and pump stations are not permitting more flow to be pumped to the WWTW but upgrading the overall system. The upgrading of the Herold's Bay WWTW is being looked at concurrently.</p> | 83 |
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| <p>the 'Maalgate River Estuarine Management Plan, 2019'</p> | | | |
| <p>9. Specialist Studies Faunal Assessment</p> <p>The faunal assessment appears comprehensive and methodologically sound. However:</p> <ul style="list-style-type: none"> • 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. | | <ul style="list-style-type: none"> • The 2023 Western Cape Biodiversity Spatial Plan (WC BSP) was formally adopted into law on the 13th of December 2024. The specialists' reports were compiled between October 2023 and September 2024. Therefore, at the time of compiling their reports the 2023 WCBSP was not applicable. • Please refer to page 25 of the EMPr. • The specialist who conducted the Terrestrial and Faunal study is SACNASP Registered with a PhD in his field. His report complies with protocol for the specialist assessment and minimum report content requirements for impacts on terrestrial animal species and terrestrial biodiversity for activities requiring environmental authorisation. | 84 |
| <p>Floral Assessment</p> <p>The botanical assessment is also considered robust, but several improvements are recommended:</p> <ul style="list-style-type: none"> • 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. | | <ul style="list-style-type: none"> • The 2023 Western Cape Biodiversity Spatial Plan (WC BSP) was formally adopted into law on the 13th of December 2024. The specialists' reports were compiled between October 2023 and September 2024. Therefore, at the time of compiling their reports the 2023 WCBSP was not applicable. • The botanical specialist states:" Only two SCC were recorded, namely <i>Cullumia carlinoides</i> (Near Threatened) and <i>Dioscorea sylvatica</i> (Vulnerable). • Please refer page 26 of Appendix G1. • Your recommendation is acknowledged. • Alien vegetation clearing forms part of the rehabilitation phase of the project and is addressed within the Environmental Management Programme (Appendix H). • Please refer to pages 34 – 35 of the Environmental Management Programme (Appendix H). | 85 |

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| <ul style="list-style-type: none"> A detailed rehabilitation plan should be prepared and implemented by a specialist. | | | |
| <p>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.</p> | | <p>Appendix G1 is the Botanical Impact Assessment which focuses on plant species and vegetation. Appendix G3 is the Terrestrial Biodiversity and terrestrial faunal species impact assessment. Therefore, you are correct, the botanical assessment does focus on flora and not fauna. Please refer Appendix G3 for a more comprehensive assessment of biodiversity and fauna. Appendix G2 is the aquatic assessment and mentions that according to the STR the site falls within the Outeniqua SWSA.</p> | 86 |
| <p>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.</p> | | <p>All complaints received by the municipality are investigated, legitimate issues are addressed as far as practically possible.</p> <p>Please refer to response #31.</p> | 87 |
| <p>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 (H₂S) study has been undertaken. It is therefore recommended that either an H₂S study be</p> | | <p>A dry scrubbing odour control system will be used, as it is reliable, low-maintenance, and well suited to the site. Smelly air from inside the pump station will be extracted and passed through sealed treatment vessels containing special filtering media. This media neutralises odour-causing substances before the air is safely released outside. The system does not use chemicals or water, making it environmentally friendly.</p> | 88 |

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| <p>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.</p> | | <p>The system is designed to operate during peak conditions, such as heavy rainfall, and includes two fans to ensure continuous operation. The filter media is expected to have a service life of approximately four years, depending on actual air conditions, without affecting odour removal performance.</p> <p>An H2S study cannot be undertaken at this stage as there is no facility on site yet, the odour control measures will be periodically monitored at a frequency still to be determined and maintained as appropriate. Odor complaints will be managed in the same manner as noise and all other complaints the municipality receives</p> | |
| <p>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.</p> <p>Key issues that warrant further consideration include:</p> <ul style="list-style-type: none"> • 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. <p>A risk assessment or health impact assessment should be undertaken to evaluate potential public health implications should sewage reach the beach or surrounding environment.</p> | | <p>Please refer to response #29 and #78.</p> <p>In the National Environmental Management Act (NEMA) EIA process, a health impact assessment (HIA) specialist is not automatically required but should be included where a project may pose meaningful risks to human health, beyond what standard specialist studies can adequately address on their own.</p> <p>In this case pumpstations are not anything new and form the backbone of all residential areas.</p> | 89 |

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| <p>13. Operational Risks and Long-Term Risk Management</p> <p>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.</p> | | <p>The operational impact on water quality caused by leaks or damage to rising main due to vandalism, flood events or storm surges has been assessed and can be mitigated to negligible significance.</p> <p>Please refer to the Engineering report as the whole proposal is to mitigate operational impacts. The Specialist assessments which infer the impact assessment take into account the functions of a pumpstation and pipeline. There are no listed activities triggered by the proposal which has operational aspects warranting operational phase management plans.</p> | 90 |
| <p>14. Long-Term Maintenance</p> <p>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.</p> | | <p>Long term maintenance is not included in this process, and any requirements will be undertaken if and when required, if the proposed maintenance triggers listed activities, the appropriate steps will be taken this is however unlikely.</p> <p>No operational listed activities are associated with this proposal and as such no operational aspects are required in the EMPr</p> | 91 |
| <p>15. Geotechnical Assessment</p> <p>A geotechnical investigation has been undertaken, but it was not circulated as part of the public participation process.</p> | | <p>The Geotechnical investigation related to the underground storage tank that was part of the initial proposal. The applicant has decided against it, therefore it is no longer applicable as mentioned throughout the BAR. The</p> | 92 |

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| <p>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.</p> | | <p>Geotechnical investigation findings were also incorporated into the engineering report, and this was taken into account during the assessment of impacts and all appropriate mitigation measures are included in the EMPr</p> | |
| <p>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:</p> <ul style="list-style-type: none"> • 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 <p>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.</p> | | <p>All authorities listed have been reminded to comment. According to the EIA Regulations (2014, as amended), if no comments are issued, the authority is deemed to have completed its review without having comments.</p> <p>CapeNature's (#109 – #122) and DEA&DP Coastal Management's (#95 – #108) comments can be seen below.</p> | 93 |
| <p>Conclusion</p> | | <p>Thank you for your comments.</p> | 94 |

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| <p>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.</p> <p>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 EMPr are therefore recommended to ensure that potential environmental, social and health impacts are adequately addressed.</p> <p>We trust that these comments will assist in strengthening the final assessment and ensuring that the proposed development proceeds in an environmentally responsible manner.</p> | | | |
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| COMMENT | NAME/ORGANISATION | RESPONSE | |
| <p>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</p> | <p>Mercia Liddle</p> <p>Department of Environmental Affairs and Development Planning Biodiversity and Coastal Management</p> <p>13 March 2026</p> | | 95 |

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| <p>('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".</p> | | | |
| <p>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.</p> | | <p>This is understood.</p> | <p>96</p> |
| <p>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.</p> | | <p>This is noted.</p> | <p>97</p> |
| <p>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</p> | | <p>This is noted.</p> | <p>98</p> |

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| <p>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.</p> | | | |
| <p>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</p> | | <p>Thank you for reviewing the DBAR.</p> | <p>99</p> |
| <p>2.1.2. The proposed alterations to PS1 will result in encroachment onto Coastal Public Property (CPP) of approximately 46m². This expansion is said to not trigger coastal listed activities as per the EIA Regulations Listing Notice 1, as the proposed expansion footprint is less than 50m² threshold and will result in less than 5m² of material being place in the footprint of the expansion.</p> | | <p>This is correct.</p> | <p>100</p> |
| <p>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.</p> | | <p>Thank you.</p> | <p>101</p> |

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| <p>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.</p> <p>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.</p> | | <p>Thank you for the correction. This will be corrected in the FBAR.</p> | <p>102</p> |
| <p>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,</p> | | <p>Thank you.</p> | <p>103</p> |

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| <p>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 proactive 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.</p> | | | |
| <p>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.</p> | | <p>Thank you for your support.</p> | <p>104</p> |
| <p>2.1.7. It is noted that the proposed upgrades also align with the Provincial Spatial Development Framework, the George Municipal Integrated</p> | | <p>Thank you.</p> | <p>105</p> |

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| 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. | | Thank you. | 106 |
| 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. | | This is noted and understood. | 107 |
| 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. | | Thank you for your comments. | 108 |
| COMMENT | NAME/ORGANISATION | RESPONSE | |
| 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 | Megan Simons CapeNature | | 109 |

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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, GEORGE MUNICIPALITY, WESTERN CAPE

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| <p>the application. CapeNature wishes to make the following comments:</p> | <p>13 March 2026</p> | | |
| <p>According to the Western Cape Biodiversity Spatial Plan (CapeNature 2024)¹ 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). According to the South African Vegetation Map (Beta VegMap, 2024), 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)</p> | | <p>This is correct.</p> | <p>110</p> |
| <p>Part of the sewer pipe also transverses a natural unchannelled valley-bottom wetland (Nel et al., 2011). Furthermore, the property is within the National Strategic Water Source Area surface 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:</p> | | | <p>111</p> |
| <p>1. The Garden Route Granite Fynbos is one of the seven high risk Critically Endangered vegetation types in South Africa (Skowno et al. 2018). 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</p> | <p>Alternative pipeline routes were investigated but were not a feasible option. Please refer to pages 66 – 70 of the BAR.</p> | <p>112</p> | |

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| <p>conservation priority. Where feasible, alternative alignments should be considered to reduce disturbance within sensitive areas.</p> | | | |
| <p>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.</p> | | <p>Thank you for this information.</p> | 113 |
| <p>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:</p> <ul style="list-style-type: none"> • 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 | | <p>At this stage the property is not formally registered as a nature reserve under NEM:PAA and therefore it is not yet applicable. While this status is pending, we remain committed to ensuring that any proposed development does not compromise the site's ecological integrity or its potential for future declaration.</p> <p>It is also worth noting that the section of this proposal relating to this property is to construct a rising main as close as possible to the existing line up to the existing WWTW. The application of this property in terms of the NEM:PAA surely takes into account that the WWTW is already located there.</p> | 114 |

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| <ul style="list-style-type: none"> Climate change and connectivity corridors: contributing to the protection of the Maalgate River estuary. | | | |
| <p>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:</p> <ul style="list-style-type: none"> Conservation objectives remain achievable. Development does not compromise the ecological integrity required for formal declaration. Long-term management of the site remains feasible. | | | |
| <p>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.</p> | | <p>The pipeline that crosses Farm 386 is existing infrastructure. The new pipeline will be placed parallel to it and leads to the existing WWTW.</p> | 115 |
| <p>6. Previous biodiversity assessments undertaken on the property recorded several species of conservation concern, including species classified as Near Threatened (<i>Cullumia carlinoides</i>, <i>Erica dispar</i>, <i>Freesia caryophyllacea</i>, <i>Freesia leichtlinii</i> ssp. <i>Alba</i>, <i>Holothrix Pilosa</i>, and <i>Oxalis pendulifolia</i>), Endangered (<i>Euchaetis albertiniana</i>, <i>Disa hallackii</i>, <i>Lampranthus pauciflorus</i>, and <i>Muralta knysnaensis</i>), Vulnerable (<i>Drosanthemum edwardsiae</i> and <i>Gladiolus vaginatus</i>). The current botanical assessment only recorded <i>Cullumia carlinoides</i>.</p> | | <p>Although those species are found on the larger property, the botanical assessment recorded two SCC namely <i>Cullumia carlinoides</i> (Near Threatened) and <i>Dioscorea sylvatica</i> (Vulnerable) within the proposed footprint.</p> <p>All the SCC listed that the specialist has not found are flower species. The specialist stated in his report that the only gap in the information provided is the possible presence of spring flowering bulbs.</p> | 116 |

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| <p>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.</p> | | <p>Jan Vlok and Bionerds will be contacted during the search and rescue before construction commences by the appointed specialists undertaking the search and rescue.</p> <p>A condition is added in the EMPr to highlight this.</p> | 117 |
| <p>8. Pre-construction walk-down surveys during the appropriate flowering season should be undertaken to ensure that species of conservation concern are not impacted.</p> | | <p>This is understood, however, it must be noted that there is not much room for pipeline alignment deviation and as such if species are found within the proposed footprint, they will be transplanted.</p> | 118 |
| <p>9. The wastewater treatment and effluent management must be aligned with the long-term protection of the surrounding biodiversity and ecological processes.</p> | | <p>This is understood. It must however be noted that this does not form part of this proposal, please refer to the BAR for the scope of this proposal.</p> | 119 |
| <p>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.</p> | | <p>All these aspects are discussed in the EMPr (Appendix H).</p> | 120 |
| <p>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.</p> | | <p>This is noted.</p> | 121 |
| <p>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</p> | | <p>All construction impacts can be mitigated to negligible, low or no significance. Therefore, we believe we have shown that the ecological integrity and conservation objectives will not be compromised.</p> <p>It must also be noted that this proposal is to strengthen the reliance of existing infrastructure. The property and stewardship status of the site must surely have taken into</p> | 122 |

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| on any additional information that may be received. | | account that there is essential service infrastructure on the property, the proposal will not change the status quo. | | | | | | | | | | | | | | | | |
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| COMMENT | NAME/ORGANISATION | RESPONSE | | | | | | | | | | | | | | | | |
| <p>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.</p> <p>2.This letter serves as an acknowledgment of receipt of the Draft Basic Assessment Report ("DBAR") document by this Department on 9 February 2026.</p> <p>3.This Directorate appreciates the extension to the commenting period, which the EAP has agreed to.</p> | <p>Dorien Werth</p> <p>Department of Environmental Affairs and Development Planning</p> <p>27 March 2026</p> | | 123 | | | | | | | | | | | | | | | |
| <p>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.</p> | | This is correct. | 124 | | | | | | | | | | | | | | | |
| <p>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</p> | | <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="4" style="text-align: center;">Alternatives to be considered for approval:</th> </tr> <tr> <th style="width: 25%;"></th> <th style="width: 25%;">Preferred alternative</th> <th style="width: 25%;">Alternative B</th> <th style="width: 25%;">No-Go</th> </tr> </thead> <tbody> <tr> <td rowspan="2" style="text-align: center; vertical-align: middle;">PS1 upgrade</td> <td>Remainder of erf 95</td> <td>Remainder of erf 95</td> <td style="text-align: center;">/</td> </tr> <tr> <td>Upgrade PS1 in</td> <td>Upgrade PS1 in</td> <td style="text-align: center;">/</td> </tr> </tbody> </table> | Alternatives to be considered for approval: | | | | | Preferred alternative | Alternative B | No-Go | PS1 upgrade | Remainder of erf 95 | Remainder of erf 95 | / | Upgrade PS1 in | Upgrade PS1 in | / | 125 |
| Alternatives to be considered for approval: | | | | | | | | | | | | | | | | | | |
| | Preferred alternative | Alternative B | No-Go | | | | | | | | | | | | | | | |
| PS1 upgrade | Remainder of erf 95 | Remainder of erf 95 | / | | | | | | | | | | | | | | | |
| | Upgrade PS1 in | Upgrade PS1 in | / | | | | | | | | | | | | | | | |

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| <p>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.</p> <p>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.</p> <p>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.</p> <p>It is requested that a clear and concise description of the preferred alternatives is provided, especially with consideration of the Water Use Licence that has been approved.</p> | | | accordance with the design report. | accordance with the design report. | |
| | | PS4 Construction | Erf 116 | Erf 116 | / |
| | | | Construct PS4 in accordance with the design report. | Construct PS4 in accordance with the design report. | / |
| | | Pipeline installation | 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. | 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. | / |
| Install pipeline underground | Install a section of the pipeline on plinths | | / | | |
| | | <p>The Water Use Licence authorises the construction of a new sewage pump station and rising main in Herold's Bay, each with a capacity of 52 L/s, located on specified properties. These works must be executed in accordance with the Specialist Aquatic Assessment (May 2024) and the Design Report (December 2024), ensuring environmental</p> | | | |

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| | | <p>compliance and technical integrity. Furthermore, the licence stipulates that all new pump stations must be designed to avoid environmental and health risks associated with the discharge of untreated sewage into the water resource. The designs of both new and refurbished pump stations must be approved by the responsible authority. The WULA is based on the same design report this application is based on, thereby aligning regulatory authorisation with the approved engineering specifications.</p> <p>The preferred alternative is split in two sections. The pipeline installations are discussed in Section B3.3 and the pumpstation upgrades and construction are discussed in Section B4.4. However, a summary of the preferred alternative will be added to the FBAR. Essentially the rising main will be upgraded, a new PS4 will be constructed, PS1 will be linked to PS4 and an emergency storage tank will be constructed near PS1.</p> | |
| <p>6.Synchronising applications in terms of other applicable legislation with the EIA process:</p> <p>(a)National Water Act, Act No. 36 of 1998 ("NWA") (Synchronisation of the WULA – EIA processes / applications.</p> <p>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</p> | | <p>The actual implementation and synchronisation of two separate processes, through two different departments, who have different timeframes for their processes have been the topic of many DEA&DP workshop debates and interpretations have varied over the years with no clear stance taken or circular released on how to actually achieve this. In practise, the WULA has to be completed and submitted before the final BAR and proof of the submission or notification from BOCMA that they have enough information to take a decision has to be included. Even with unpredictable delays experienced in all state departments, this has been achieved in this process and proof of submission of the WULA is provided with this final BAR. One needs to also step back and take into consideration that this application is for the upgrade for the sewerage system.</p> | 126 |

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| <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> | | <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="text-align: left;">BAR process</th> <th colspan="2" style="text-align: left;">WULA</th> </tr> </thead> <tbody> <tr> <td style="width: 15%;">12 September 2024 – 18 October 2024</td> <td style="width: 25%;">Pre-application public participation</td> <td colspan="2">Waiting for the design report.</td> </tr> <tr> <td colspan="2" rowspan="2">Waiting on the George municipality for the possible acquisition of property.</td> <td style="width: 15%;">17 January 2025 – 18 March 2025</td> <td style="width: 15%;">60-day public participation period</td> </tr> <tr> <td>17 April 2025</td> <td>WULA submitted</td> </tr> <tr> <td>3 September 2025</td> <td>Finalisation of the land acquisition.</td> <td>5 September 2025</td> <td>WUL issued.</td> </tr> <tr> <td>30 January 2026</td> <td>Submission of application</td> <td></td> <td></td> </tr> <tr> <td>12 February 2026 – 17 March 2026</td> <td>Draft BAR public participation period</td> <td></td> <td></td> </tr> </tbody> </table> <p>DEA&DP was a commenting authority for the WULA PPP and as such your directorate has been provided with an opportunity to review and comment on that process regardless, please refer to appendices G2 and Appendix M for the Aquatic report and WULA summary report.</p> <p>No operational listed activities are associated with this proposal and as such no operational aspects are required in the EMPr. The WUL is attached to the EMPr as Appendix E.</p> | BAR process | | WULA | | 12 September 2024 – 18 October 2024 | Pre-application public participation | Waiting for the design report. | | Waiting on the George municipality for the possible acquisition of property. | | 17 January 2025 – 18 March 2025 | 60-day public participation period | 17 April 2025 | WULA submitted | 3 September 2025 | Finalisation of the land acquisition. | 5 September 2025 | WUL issued. | 30 January 2026 | Submission of application | | | 12 February 2026 – 17 March 2026 | Draft BAR public participation period | | |
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| BAR process | | WULA | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| <p>(b)National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA")(Synchronisation of the HIA – EIA processes / applications)</p> <p>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.</p> | | <p>The referred comment is still applicable as confirmed in comment #73.</p> | 127 |
| <p>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.</p> | | <p>Please refer to responses #1 - #6 for previous correspondence.</p> | 128 |
| <p>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.</p> <p>If, however, significant changes have been made, or significant new information has been added to</p> | | <p>Thank you for the information.</p> | 129 |

COMMENTS AND RESPONSE REPORT

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, GEORGE MUNICIPALITY, WESTERN CAPE

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| <p>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.</p> <p>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.</p> | | | |
| <p>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.</p> | | <p>This is noted</p> | <p>130</p> |
| <p>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,</p> | | <p>This is understood.</p> | <p>131</p> |

COMMENTS AND RESPONSE REPORT

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, GEORGE MUNICIPALITY, WESTERN CAPE

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| 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. | | Thank you for your comments. | 132 |
| 10. This Department reserves the right to revise or withdraw initial comments or request further information from you based on any information received. | | | |
| COMMENT | NAME/ORGANISATION | RESPONSE | |
| 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: | Sbonelo Ndlovu BOCMA Dated: 13 March 2026 | | 133 |
| 1. The Breede-Olifants Catchment Management Agency has reviewed the Draft Basic Assessment and has no objections to the proposed development. | | This is noted and appreciated. | 134 |
| 2. Please note that BOCMA issued a Water Use Licence (Licence No: 01/K30B/1/16508) 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. | | The WUL is attached to the BAR as Appendix M and attached the EMPr as Appendix E. | 135 |
| 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, | | This is understood. | 136 |

COMMENTS AND RESPONSE REPORT

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, GEORGE MUNICIPALITY, WESTERN CAPE

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| <p>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.</p> | | | |
| <p>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.</p> | | <p>This is understood.</p> | <p>137</p> |
| <p>5. Kindly note that this office reserves the right to amend and revise its comments as well as to request any further information.</p> | | <p>This is understood.</p> | <p>138</p> |
| <p>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</p> | | <p>Thank you for your comments.</p> | <p>139</p> |

COMMENTS AND RESPONSE REPORT

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 BRAKFORTEIN NO. 236, HEROLDS BAY, GEORGE MUNICIPALITY, WESTERN CAPE

| COMMENT | NAME/ORGANISATION | RESPONSE | |
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| <p>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.</p> <p>1.2 Your draft basic assessment report 14/HBPS/GM/04/23 dated 23 January 2026.</p> <p>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.</p> <p>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.</p> | <p>Vanessa Stoffels</p> <p>Chief Directorate: Road Planning</p> <p>12 March 2026</p> | <p>Thank you for your comments. The appointed civil engineer will be notified of this.</p> | <p>140</p> |