
The EAP
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Attention: Mr. Michael Bennett

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Good day Sir

RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE REVISED DRAFT BASIC ASSESSMENT PROCESS FOR THE PROPOSED UPGRADING OF THE BULK SEWERAGE LINE FROM AMY SEARLE STREET / GREENHAVEN TO THE CRICKET FIELD SEWERAGE PUMPSTATION ON ERVEN 4808, 4809, 4807, 770, 733, 83 AND REMAINDER OF FARM 4812, STREET PARCEL RE/131 AND STREET PARCEL RE/4893, GROOT BRAKRIVIER, MOSSEL BAY MUNICIPALITY, WESTERN CAPE

Your request for comment from the Sub-directorate: Coastal Management pertaining to the notice of final Basic Assessment Report for the above-mentioned application received via email on 26 February 2026, refers.

1. CONTEXT

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

- 1.2. The Department, in pursuant of fulfilling its mandate, is implementing the Provincial Coastal Management Programme ("PCMP"). The Western Cape Provincial Coastal Management Programme ("WC: PCMP 2022-2027") 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. This WC: PCMP 2022-2027 was adopted by the Provincial MEC for Local Government, Environmental Affairs and Development Planning on 19 May 2023 and available upon request.
- 1.3. A key priority of the PCMP is the Estuary Management Programme, which is implemented in accordance with the NEM: ICMA and the National Estuarine Management Protocol ("NEMP"). Relevant guidelines, Estuarine Management Plans, Mouth Management Plans need to be considered when any listed activities are triggered in the Estuarine Functional Zone. The Department is in the process of approving a series of Estuarine Management Plans of which over 20 Estuarine Management Plans have already been approved.
- 1.4. The facilitation of public access to the coast is an objective of the NEM: ICMA as well as a Priority in the WC PCMP. The Department developed the Provincial Coastal Access Strategy and Plan, 2017 ("PCASP") and commissioned coastal access audits per municipal district to assist municipalities with identifying existing, historic, and desired public coastal access. These coastal access audits also identify hotspots or areas of conflict to assist the municipalities with facilitating public access in terms of Section 18 of the NEM: ICMA. The PCASP as well as the coastal access audits are available upon request.

2 COMMENT

- 2.1 The sub-directorate: Coastal Management ("SD: CM") has reviewed the information as specified above and has the following commentary:
 - 2.1.1 The proposal comprises the proposed installation of a new 300mm pipeline that will run along the edge of the Estuarine Functional Zone (EFZ) of the Great Brak Estuary. The upper, western most section of the pipeline is located adjacent to freshwater wetland habitat. Much of the pipeline is located within the EFZ and will be buried immediately adjacent to Amy Searle and Long streets (beneath the sidewalk). The southern most section of the pipeline deviates from Long Street, further in towards the EFZ and closer to open water estuarine habitat (shown in Figure 1 below).

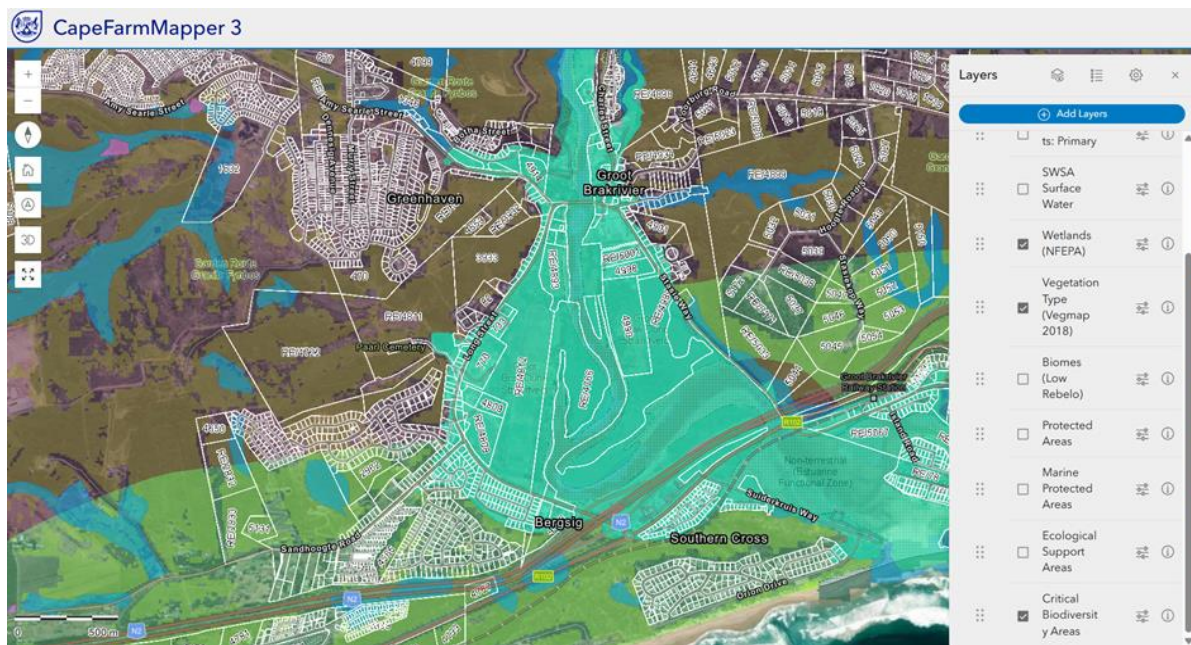


Figure 1: CapeFarmer imagery showing wetlands, vegetation types and Critical Biodiversity Areas (CBAs) within the proposed development site.

2.1.2 The development is inland of the Mossel Bay Coastal Management Line (CML) and the Mossel Bay Coastal Protection Zone (CPZ). CMLs for the Eden (Garden Route) District have been delineated by the Department of Environmental Affairs & Development Planning (DEA&DP) in collaboration with relevant organs of state and are available spatially on the DEA&DP web-based viewer for your consideration and use (as shown in Figure 2 below). The proposed development site fits the description of a CPZ as defined in Section 16 of the NEM: ICMA. It must be noted that 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 climate change.

2.1.3 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.

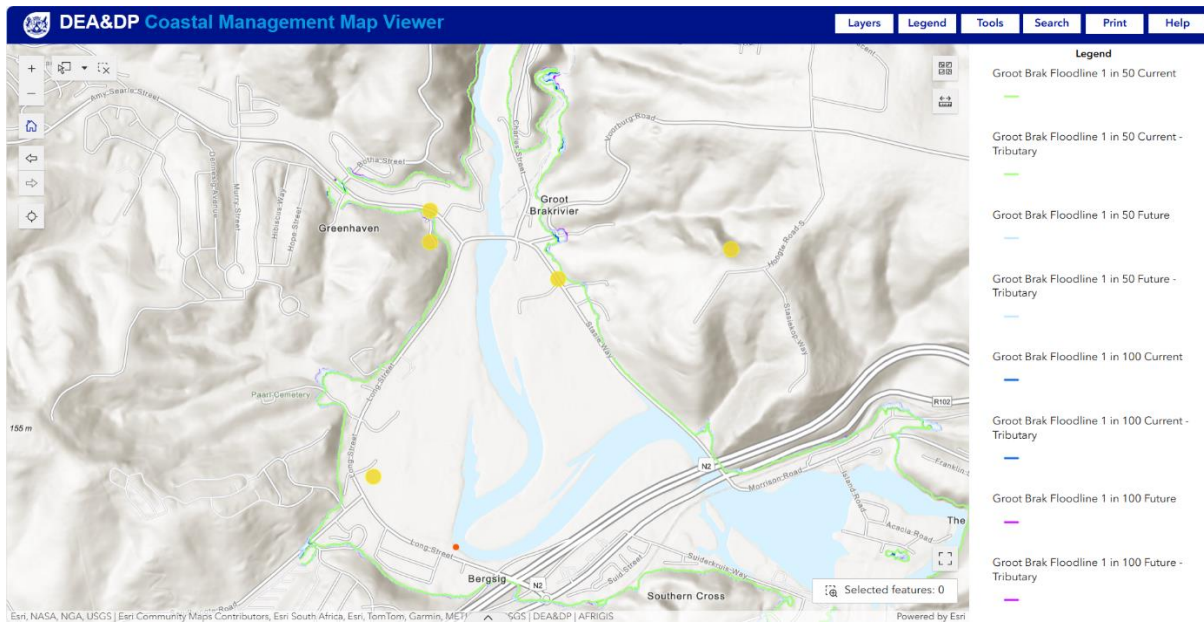


Figure 2: Map showing floodlines within the development proposal site.

2.1.4 The Western Cape Estuarine Management Framework and Implementation Strategy:

Best Practice Activity Guidelines (October 2019) provide the following considerations regarding land-use planning adjacent to and in the estuarine functional zone, which must be considered as part of this development proposal:

- a. the dynamic nature of estuaries and the broader LAZ must be taken into account in land-use planning. This includes planning for the natural meandering and/or migration of the estuary channel and mouth, riparian flooding, tidal surges and sea storm events, as well as the long-term natural processes of erosion and accretion in the coastal zone.
- b. where possible, Critical Biodiversity Areas (CBAs) and priority Ecological Support Areas (ESAs), as well as remaining natural ecosystems, particularly forests, riparian margins and dune systems, should be preserved. These natural units holistically provide protection against extreme events (natural disasters) and associated erosion.
- c. unless essential, no new development should be approved to take place in the EFZ or the highly dynamic Littoral Active Zone (LAZ).
- d. development must take cognisance of any adopted CML and the applicable controls, and/or coastal risk lines where high risk areas are identified (shown in **Appendix A2 – Coastal Risk Zones** for this development proposal – figure 3 below).

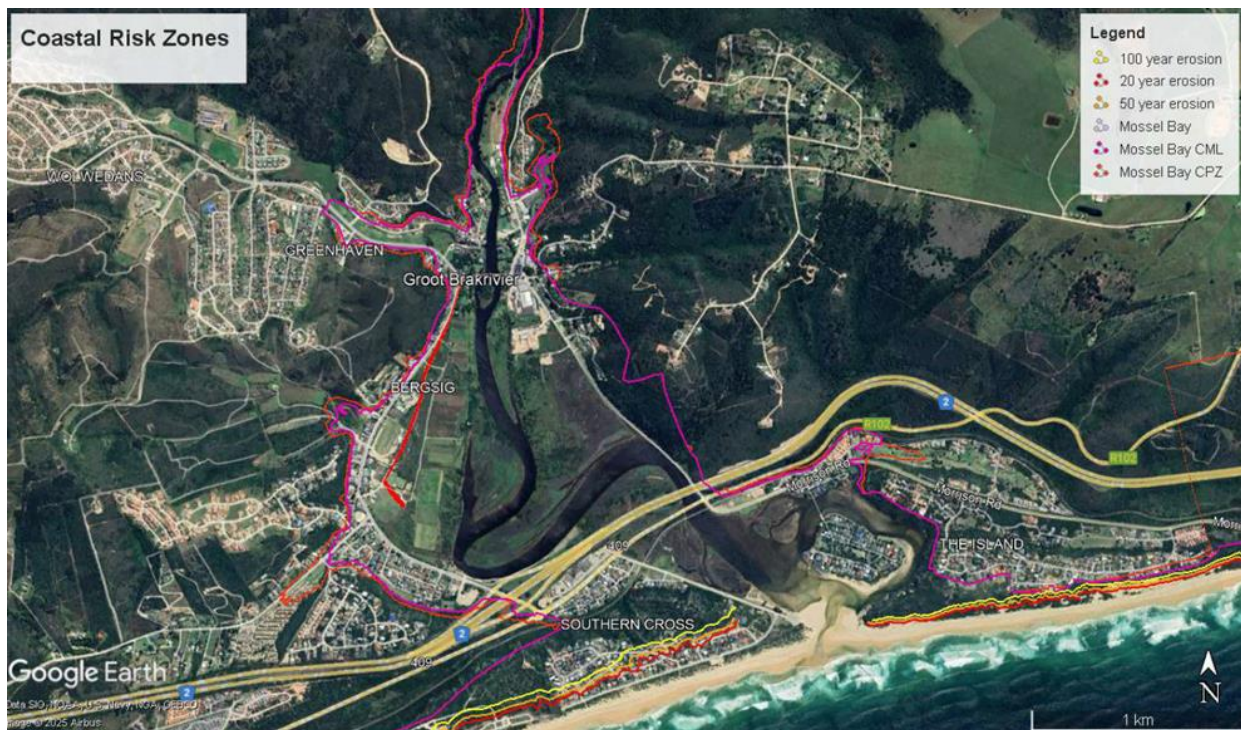


Figure 3: Map showing the floodlines, Mossel Bay CML and Mossel Bay CPZ

2.1.5 The proposed development is compliant with specific development parameters for development in the coastal risk zone except for one parameter relating to municipal bulk infrastructure. The Coastal Management Lines for Garden Route (Eden) District Project Report (July 2018) states that municipal bulk infrastructure, and where possible reticulation networks, are to be located outside the overlay zone unless related to coastal public amenity (e.g. playground). Figure 1 below shows that affected land parcels related to the development footprint are entirely within the EFZ (floodplain and wetland habitat).

2.1.6 Installation of the new 300mm pipeline may result in reduction in base and low flows in the catchment area. This may then result in the need for manipulation of the estuary (e.g. artificial breaching and flushing of the lagoon) in future to deal with pollution. However, the proposed development is essential as it will ensure the removal of sewage from commercial and residential properties in a safe manner and will reduce recurring incidents of sewer reaching the estuary.

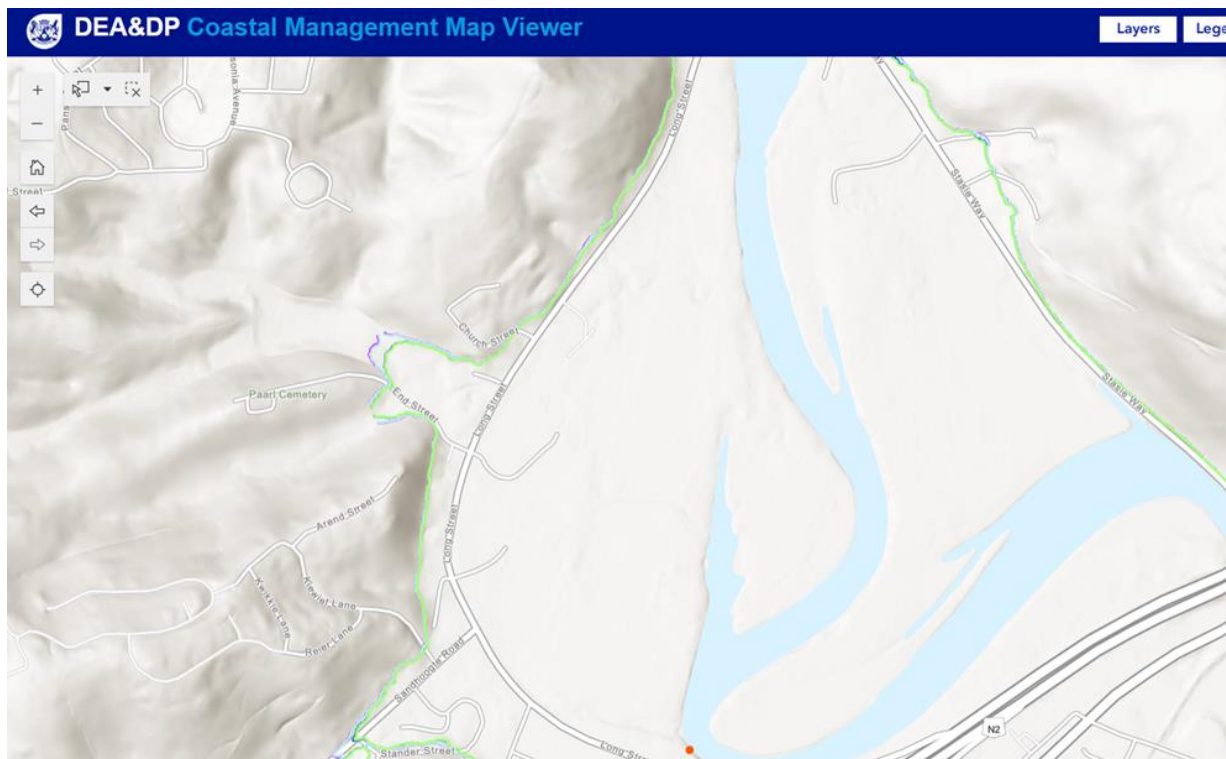


Figure 4: Map showing the location of a PLS along Long Street and on the estuary (shown as a small red dot)

- 2.1.7 It must be noted that there is a Public Launch Site (PLS) located near Erf 434 (shown as a small red dot in Figure 4 above). The relocation of the PLS is highly recommended given the approved upgrades to the Great Brak Municipal Sewer System which will come into effect in the near future. The management and operation of the PLS, as well as the health and safety of boat users and general public, will be affected (including public coastal access) should the proposed installation of a new 300mm pipeline be approved. It is essential that public coastal access is not negatively impacted by the proposed upgrades to the sewer system.
- 2.1.8 According to the Western Cape Biodiversity Spatial Plan (WCBSP) for Mossel Bay, the lower, southern section of the pipeline traverses natural and modified aquatic Critical Biodiversity Areas (CBAs), namely an (i) estuary, (ii) river, (iii) terrestrial vegetation and (iv) wetland. The Groot Brak Dune Strandveld, listed as Critically Endangered, is found within the entire proposed development footprint. Although transformed, the Groot Brak Dune Strandveld is assessed as being at risk of collapse since 2018 (Terrestrial Biodiversity Assessment, prepared by Johannes Adriaan van der Walt, dated 17 August 2025). The safeguarding and rehabilitation of the Strandveld must be of high priority, both pre- and post-construction.

- 2.1.9 The Garden Route District Municipality and DEA&DP reviewed the Garden Route District Coastal Management Programme (CMP) in 2023/2024. It is important to consider this document to limit development in ecologically sensitive or vulnerable coastal areas and to ensure equitable access to coastal areas. Estuaries are dynamic waterbodies and are particularly vulnerable to impacts of climate change, therefore the preservation and management of the EFZ is critically important.
- 2.1.10 Both the revised Basic Assessment Report (BAR) and the Specialist Estuarine Assessment (dated 15 September 2025) reference the draft January 2018 Groot Brak River Estuary Estuarine Management Plan (EMP). Please note that the correct document to use is the approved Groot Brak River EMP approved in 2025.
- 2.1.11 The Specialist Estuarine Assessment (prepared by Confluent Environmental Pty (Ltd) dated 5 September 2025) categorizes the Great Brak estuary as Category C/D – moderately to largely modified. The basic ecosystem functions and processes for both the Great Brak estuary and the unchanneled valley bottom wetland remain predominantly unchanged despite modifications. The Assessment categorises the wetland as a Category C - moderately modified. The wetland has shrunk over time and has been artificially drained to accommodate new development and reduce flooding. Despite this transformation, the wetland is still large, provides viable habitats for flora and fauna, its hydrological attributes remain largely unchanged and the Great Brak estuary remain highly functional.
- 2.1.12 The ecosystem services within the great Brak estuary is still key to the survival of aquatic ecosystems within the catchment area. Connectivity between the CBAs is crucial, especially when areas are rehabilitated properly. It is therefore essential that the operation of the sewer system does not negatively impact the health and ecological functioning of the estuary.
- 3 The SD:CM does not object to the proposed development of upgrading of the bulk sewerage line from Amy Searle Street/Greenhaven to the Cricket Field Sewerage Pump Station on Erven 4808, 4809, 4807, 770, 733, 83 and Remainder of Farm 4812, Street Parcel Re/131 and Street Parcel RE/4893 near Groot Brak Rivier in Mossel Bay as the proposed development will provide important services to the public, and since the project is associated to the implementation of the Environmental Authorisation (EA) for the Great Brak Sewer System Upgrades (Reference: 16/3/3/1/D6/17/0005/25, issued 11 November 2025). The service delivery aspect necessitates that the development be located within the CPZ to avoid unnecessary recurring sewer leaks into the Great Brak estuary.

- 4 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.
- 5 The SD: CM reserves the right to revise its comments and request further information from you based on any information that may be received.

Yours faithfully

leptieshaam Bekko
CONTROL ENVIRONMENTAL OFFICER
DIRECTORATE: BIODIVERSITY AND COASTAL MANAGEMENT
DATE: 09 April 2026