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OFFICE OF THE MUNICIPAL MANAGER

Enquiries: Dr NS Viljoen
Reference: 18/2/4/R
Date: 25 June 2026

Attention: Me. Jessica Gossman
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Dear Sir / Madam,

RE: NOTIFICATION OF THE COMMENCEMENT OF THE 30-DAY PUBLIC PARTICIPATION COMMENTING PERIOD OF THE PROPOSED REMOVAL AND REPLACEMENT OF THE EXISTING ROAD AND CULVERT INFRASTRUCTURE LOCATED ALONG DIVISION ROAD (DR) 1602 KM 8.48, KLEINPLAAS ROAD, CROSSING FARM 338 AND PORTION 6 OF FARM 220, MOSSEL BAY LOCAL MUNICIPALITY, GARDEN ROUTE DISTRICT MUNICIPALITY. (DEADP REF NO: 16/3/3/1/D6/29/0022/26).

The Garden Route District Municipality (GRDM) acknowledge receipt of the draft Basic Assessment Report (BAR), prepared by Sharples Environmental Services cc (SES) on behalf of the Western Cape Government Department of Infrastructure, dated 14

May 2026. We would like to thank you for providing the Municipality with the opportunity to comment on this application.

After review of the draft BAR, we wish to provide the following comments and recommendations on the proposed activities:

1. Biodiversity

The proposed development footprint is located in a sensitive biodiversity context, including mapped aquatic and wetland Critical Biodiversity Areas associated with the Varings River. The broader vegetation context includes Garden Route Granite Fynbos, which is identified in the draft BAR as Critically Endangered, although the terrestrial specialist also indicates that the actual footprint is highly disturbed and dominated by alien invasive species.

The fact that the site is disturbed does not remove the need for strict biodiversity management. Disturbed CBAs and ESAs still require rehabilitation and careful management, especially where the disturbance is associated with a watercourse, wetland habitat, riparian vegetation and invasive alien vegetation. The draft BAR records alien invasive species including Eucalyptus, Black Wattle, Port Jackson and Beefwood, and it also recognises that alien tree removal can destabilise riverbanks if not undertaken carefully.

Recommendation:

All areas outside the approved construction footprint and working corridor must be treated as no-go areas. The final BAR and EMPr must include a clear rehabilitation plan, a search-and-rescue plan where applicable, and an alien invasive plant management plan. Alien invasive removal along the riverbanks must be phased and combined with bank stabilisation, erosion protection and replanting with locally appropriate indigenous species. No vegetation clearing may take place outside the authorised footprint, and the final BAR must clearly quantify the actual extent of indigenous vegetation clearance.

2. Aquatic Biodiversity, Wetlands and Watercourse Protection

The main environmental risk relates to direct works within the Varings River and associated wetland/riparian habitat. The draft BAR identifies the aquatic sensitivity as Very High and confirms that the watercourse will be directly impacted during removal, excavation, infilling, temporary diversion road construction and culvert replacement.

The aquatic assessment indicates that the Varings River has already been modified by the existing road crossing, narrow culvert openings, alien vegetation, sedimentation, erosion and agricultural encroachment. The Present Ecological State is described as Moderately Modified. The proposed works may improve long-term flow and sediment movement, but only if the design, temporary diversion, stormwater outlets, erosion protection and rehabilitation are implemented correctly. Poor construction in the river could worsen erosion, sedimentation and water quality.

Recommendation:

The final engineering design, construction method statement, temporary diversion design and disturbance footprint must be approved by the aquatic specialist before commencement. The smallest possible working corridor must be used. Construction in or near the watercourse should, where possible, be scheduled during the drier period. No stockpiles, refuelling, cement batching, chemical storage or concrete washout may occur within or immediately adjacent to the riparian zone. All temporary bypass material must be fully removed after construction, and the channel morphology, bed, banks and substrate must be reinstated as far as reasonably possible.

3. Stormwater, Erosion and Sedimentation

The project area is susceptible to erosion, and the draft BAR records that the soils are highly erodible. Stormwater, exposed soil, construction disturbance, bare banks and concentrated road runoff could cause sedimentation and further degradation of the Varings River if not controlled.

The existing causeway and drainage arrangements have contributed to sedimentation upstream and erosion downstream. The upgraded culvert system may improve hydraulic functioning, but the road-side drains, culvert outlets, wing walls, aprons, gabions, reno mattresses and energy dissipaters must be designed and installed to prevent concentrated high-velocity flows from scouring the channel and banks.

Recommendation:

The Environmental Authorisation should require a site-specific erosion and sediment control method statement before commencement. Stormwater outlets must be formalised and stabilised using appropriate energy dissipation measures. Silt fences, berms, geotextiles, sandbags, stabilised stockpile areas and exposed-slope protection must be available and implemented before major earthworks commence. High-rainfall contingency measures must be included, and no construction activity should continue during conditions where sediment-laden runoff is likely to enter the watercourse uncontrolled.

4. Aquatic Environment, Stormwater and Erosion

The aquatic compliance statement indicates that no watercourse is present on the property and that the site falls outside the regulated area of watercourses for purposes of Section 21(c) and (i) water use authorisation. However, the BAR also states that steep slopes, sandy soils, increased hardened surfaces and existing erosion create a material stormwater and erosion risk.

The absence of a mapped watercourse does not remove the need for robust stormwater management. The BAR acknowledges that hard surfaces will increase runoff volumes and velocities and may exacerbate existing erosion. This is especially

important because stormwater will be dispersed towards existing culverts and lower-lying areas, including infrastructure associated with the N2 corridor.

Recommendation

A final stormwater management plan based on Sustainable Drainage System principles is recommended. The plan must demonstrate pre-development versus post-development runoff, attenuation capacity, discharge points, erosion protection, downstream capacity, maintenance responsibilities, emergency overflow routes, water-quality controls, silt management during construction, and measures to prevent concentrated flow paths.

5. Climate Resilience and Flood Risk

The District Municipality supports the principle of improving flood-damaged public infrastructure, but the final BAR should demonstrate clearly that the proposed design is climate-resilient and appropriate for future flood events.

The need for the project arose from flood damage, and the draft BAR links the project to improved infrastructure resilience. It is therefore not sufficient for the report to state generally that the new causeway will improve resilience. The final submission should confirm the hydraulic capacity of the culverts, the design flood considerations, and whether climate change-related increases in flood frequency or intensity were considered in the design.

Recommendation

The final BAR should include or cross-reference the relevant engineering design information confirming that the culvert size, apron design, bank protection and road level are appropriate for the expected flood regime. The design should avoid increasing flood risk to neighbouring landowners, downstream users or adjacent agricultural land. Post-construction inspection of stormwater and erosion-control infrastructure should be required at least annually before the rainy season and after major rainfall events.

6. Fauna and Avifauna

The draft BAR records that the faunal and avifaunal sensitivities are low, with no Species of Conservation Concern recorded within the immediate footprint. This finding is accepted, subject to normal precautionary construction controls.

Although the site is disturbed and no sensitive species were recorded, construction activities can still harm common fauna through vehicle movement, open excavations, fires, noise, habitat disturbance and poor waste management. The presence of low sensitivity does not mean that no management measures are required.

RecommendationMunicipality

The EMPr must require environmental induction for all site personnel. No fauna may be trapped, fed, killed or harmed. Open excavations should be checked daily and made safe for small animals. Any fauna requiring relocation must be handled by a suitably competent person or specialist. Fires must be prohibited, and vehicles must remain within demarcated access and work areas only.

7. Heritage Resources

The draft BAR states that the heritage specialist concluded that Section 38 of the National Heritage Resources Act is not triggered and that no demolition permit is required, even though the structures are described as being older than 60 years.

This is an area that should be clearly explained in the final BAR because structures older than 60 years can potentially raise heritage permitting questions. The District Municipality does not dispute the specialist finding, but the reasoning should be clear and supported by the relevant specialist statement.

Recommendation

The final BAR must include the complete heritage statement and must clearly explain why no Heritage Western Cape process or Section 34 demolition permit is required. A chance-find protocol must be included in the EMPr. Should any archaeological, palaeontological or heritage material be uncovered during construction, work in the immediate area must stop and the relevant heritage authority or specialist must be contacted.

8. Waste, Pollution and Hazardous Substances

Although the draft BAR states that no listed waste management activity is triggered, the construction phase will still generate general construction waste and presents a risk of hydrocarbon, cement, chemical and sediment contamination.

Works within a watercourse have a higher pollution risk than ordinary roadworks. Cement wash water, contaminated stormwater, leaking plant, fuel, oil, litter and poorly managed waste can enter the Varings River and cause localised water-quality impacts.

Recommendation

The EMPr must include a practical waste and pollution prevention plan. All waste must be stored in designated containers and removed to an appropriately licensed facility. Proof of disposal should be kept on site. Fuel, oil and chemicals must be stored in bunded areas away from the watercourse. Spill kits must be available at all times. No concrete batching or washout may occur on unprotected ground or within the riparian zone. Portable toilets must be placed away from the watercourse and serviced regularly.

9. Report Corrections Required in the Final BAR

The draft BAR contains several weaknesses, internal inconsistencies and drafting errors that should be corrected before the final BAR is submitted.

A final BAR must be clear, internally consistent and decision-ready. Ambiguities in authorisations, mitigation commitments, monitoring intervals, impact areas and appendix status can make enforcement difficult and may create uncertainty for the competent authority, commenting authorities and the applicant.

Recommendation

The following matters must be corrected or clarified in the final BAR:

The report must reconcile the stated aquatic/CBA encroachment figures. In one section, the CBA aquatic/wetland encroachment is stated as 8 m², while another section refers to 12 m² of Very High Aquatic Sensitivity within the development footprint. The final BAR must provide one clear, mapped and quantified disturbance figure.

The National Water Act authorisation status must be clarified. The report refers in places to a General Authorisation that “will be applied for”, while elsewhere it states that a WUL/General Authorisation was obtained on 8 December 2025. The final BAR must clearly state whether the project is covered by a General Authorisation or a Water Use Licence, must use the correct terminology, and must attach the relevant DWS documentation.

The monitoring requirements must be made consistent. The report refers to monitoring every second day during river works, weekly monitoring during river works, bi-weekly or fortnightly post-construction monitoring, and monthly or two-weekly erosion monitoring. The final EMPr must adopt one clear monitoring schedule, and for instream construction the stricter aquatic specialist monitoring requirement should apply.

The alternatives section must be cleaned up. The report states that four road alignment alternatives were investigated, but later states that no other design or layout alternatives were investigated. This should be reconciled so that the competent authority can clearly understand which alternatives were considered and why the preferred alternative was selected.

The final BAR should remove cut-and-paste errors. Some wording appears to refer to “pipelines” or other project types, and one section refers to socio-economic alignment with the Bitou SDF and IDP, although this project is located in the Mossel Bay Local Municipality. These drafting errors should be corrected to avoid confusion.

The report should clarify the geotechnical and foundation design uncertainty. The DBAR indicates that the final foundation approach may change

depending on whether bedrock is confirmed during construction. The final BAR should explain whether any foundation design change could increase the footprint or environmental impact. Any design change that increases the footprint or affects sensitive areas should be referred back to the EAP, aquatic specialist and competent authority before implementation.

Appendix J and Appendix K are marked as not attached, although the impact/risk assessment and need-and-desirability information are important for decision-making. The final BAR must either attach these appendices or clearly state where the required information is fully included in the main report.

The Heritage section must clearly explain why no Heritage Western Cape process or demolition permit is required, given the statement that the structures are older than 60 years.

10. Concluding Remarks

The Garden Route District Municipality supports the need to repair and upgrade damaged public road and culvert infrastructure at the DR1602 Varings River crossing, provided that the project remains limited to the assessed footprint and is implemented strictly in accordance with the EMPr, specialist recommendations and applicable water-use authorisation. Failure to adequately address the above concerns in the Final BAR may result in long-term environmental degradation.

The comments provided above aims to complement the specialist inputs by ensuring practical accountability, policy alignment, and transparent decision-making.

We appreciate the efforts made by Sharples Environmental Services cc and the applicant to ensure responsible and legally compliant development activities.

The Garden Route District Municipality reserves the right to provide comment/s or to amend initial comment/s.

Yours Sincerely



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MUNICIPAL MANAGER

GARDEN ROUTE DISTRICT MUNICIPALITY

DATE: 25 June 2026