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OFFICE OF THE MUNICIPAL MANAGER

Enquiries: Dr NS Viljoen
Reference: 18/2/4/R
Date: 29 July 2025

Attention: Ms M Byleveld
Cape EAPrac
Cape Environmental Assessment Practitioners (Pty) Ltd
PO Box 2070
George 6530

Email: mariska@cape-eaprac.co.za

Cc: Mr Gerhard Otto – Manager: Disaster Management
E-mail: Gotto@gardenroute.gov.za

GRDM Admin / Records:
E-mail: Admin2@edendm.co.za

Dear Ms Byleveld,

NOTIFICATION OF THE PRE-APPLICATION PUBLIC PARTICIPATION PROCESS FOR HOUSE PHILIP ON A PORTION OF PORTION 257 OF FARM MELKHOUTE FONTEIN NO. 480, STILL BAY, HESSEQUA MUNICIPAL AREA

DEA&DP Reference: 16/3/3/6/7/1/D5/18/0398/24

The Garden Route District Municipality (GRDM) acknowledge receipt of the Pre-Application Draft Basic Assessment Report (BAR) prepared by Cape EAPrac on behalf of Ellis Farming Enterprises CC, dated 20 June 2025. We would like to thank you for providing the Municipality with the opportunity to comment on this application. After careful consideration of the report, we wish to provide the following comments and recommendations on the proposed development activities:

1. Specific Comments

Building Line Deviation:

The proposed relaxation of the 30m building line to 1m must be formally approved by the Municipality. Proof of neighbour consent (Portion 132/480) must be retained on file.

Construction Activities:

- Construction must be confined to the 13m² physical footprint. No expansion into natural areas is permitted without further assessment;
- No excavated material must be dumped or stockpiled in the No-Go area;
- A comprehensive method statement must be drawn up which provides a clear step by step plan of the sequence of construction activities that will be undertaken. The method statement must aim to minimise the length of time that cleared areas remain exposed and vulnerable to erosion;
- Access to the construction area through the No-Go area is not permitted;
- Access must be restricted to the strip of transformed EFZ immediately south of the main residential dwelling on Portion 132 of Farm 480;
- No construction materials may be stored or stockpiled outside of the area delineated by the rock revetment or in any part of the undeveloped areas of the EFZ;
- Rubble and waste materials must be managed on site and must not be dumped or stockpiled within the No-Go area;
- Working areas must be clearly demarcated;
- Estuarine habitat outside of the working area must be designated as No-Go and no disturbance (i.e. trampling, smothering etc.) in this area is permitted;
- A 10 m buffer (measured from the edge of the bankfull channel) must be implemented and be clearly demarcated as a No-Go area.

Conservancy Tank Design:

The conservancy tank air vent must be located above the 1:100 flood line to prevent flood-related effluent release. Regular emptying must be confirmed via municipal or licensed private services.

Surface Water Runoff and Erosion Control:

Runoff management (e.g., silt traps, groundcover) must be implemented during and after construction to prevent erosion and sedimentation into the estuarine zone.

Sewage and Greywater Handling:

No greywater or effluent may be discharged to ground or into the estuary. All household wastewater must be directed to the sealed conservancy tank. Chemical toilets should be provided on-site at 1 toilet per 10 persons. Waste from chemical toilets must be disposed of regularly (at least once a week) in a responsible manner by a registered waste contractor.

Access and Road Use:

The servitude access road through Portion 132/480 must remain limited to its existing width. Any upgrade requires additional authorisation.

Environmental Management Programme and ECO Oversight:

An independent Environmental Control Officer (ECO) should be appointed to monitor compliance during construction and submit regular reports. A contractor environmental induction must be conducted prior to site establishment.

Visual and Sense-of-Place Impacts:

Although visual intrusion is stated to be low, the site lies within a high-value visual landscape. We suggest that all buildings be required to adhere to a design palette with subdued colours and natural finishes to reduce visual intrusion and landscape contrast on the scenic estuarine environment.

Estuarine Functional Zone and Biodiversity:

According to the Western Cape Biodiversity Spatial Plan 2017, the property is within a Critical Biodiversity Area (CBA 1: Aquatic; Estuary). Furthermore, the property is within the Goukou Estuarine Functional Zone, which is poorly protected. This is of grave concern for the GRDM. Development within the floodplain or estuary functional zone continues to pose threats and impact the estuarine ecosystems. Estuarine environments are physically altered through land-use changes such as the development. Please also note that the proposed development is also contrary to the management objectives aligned to the WCBSP and the Goukou EMP.

Although it is mentioned in the report that the development footprint has been historically transformed and, assuming the implementation of recommended mitigation measures, its construction will not result in any modification to functional estuarine habitat, the GRDM feels that the development will inhibit the future ability of the transformed area to slowly return to its natural state, which is preferable. It is also mentioned in the report that "indigenous landscaping" will be done. The GRDM would however like to see that, if this development application is approved, the surrounding landscape / riparian area be returned to its natural estuarine functional zone state. The area should be rehabilitated by using plant species from the natural surrounding indigenous vegetation within the direct vicinity of the riparian habitat and estuarine functional zone. This should also include the removal of the artificial lawned areas, to make up for the impact of the development footprint. The rehabilitation should not be done in the form of an artificial "landscaped" garden setup, and the GRDM is concerned about the term "landscaping" as mentioned in the report.

Flood Risk Mitigation:

The dwelling is located in the 1:100-year floodline and there is a risk of flooding. For this reason, the authorization of this development should only be considered subject to the implementation of the recommendations made by the floodline assessment conducted by the WML Coast Engineers. WML Coast confirmed that the proposed dwelling will be within 32m from the edge/bank of the river and within 100m of the

high-water mark of the Goukou Estuary, which is a tidal system, and recommended that the dwelling be elevated to 5.5m above natural ground level in accordance with the WML Coastal Engineer's recommendations. The GRDM would like to see that this be made a condition of the environmental authorisation.

2. Conclusion and Recommendations:

The GRDM would generally discourage any development within the estuarine functional zone, particularly in areas like floodplains and areas with indigenous vegetation. The GRDM would like to recommend the following additional requirements:

- Confirmation and inclusion of a detailed Biodiversity Management Plan for the rehabilitation of the remaining riparian area to its natural estuarine functional zone state;
- Ecological infrastructure and natural areas must be left in a functional and natural state as they have an important role in landscape connectivity, as well as supporting the estuarine functional zone;
- The BOCMA to be consulted on this application;
- Clear visual mitigation conditions in the architectural design phase;
- Confirmation of service agreements with the local municipality for blackwater removal and tank maintenance;
- Any pruning or removal of Milkwood trees must be subject to a permit from the Department of Forestry, Fisheries and the Environment (DFFE – Forestry Branch). A pre-construction botanical walkdown is recommended to confirm no-go zones.

We appreciate the efforts made by Cape EAPrac and the applicant to ensure a responsible and legally compliant development.

These comments are submitted in the interest of promoting responsible development within the estuarine context of the Still Bay region. The Municipality reserves the right to revise these comments upon review of updated BAR versions or upon receipt of further specialist information.

Yours Sincerely



(pp) NTHABELENG RAISA-MLANDU
ACT. MUNICIPAL MANAGER
GARDEN ROUTE DISTRICT MUNICIPALITY
DATE: 29 July 2025