



Eco Route

ENVIRONMENTAL CONSULTANCY

REGISTRATION NO. 1998/031976/23

DR. COLLEEN EBERSOHN

PhD Univ. Pretoria

Cell:072 222 6013

e-mail: ebersohn@cyberperk.co.za

MS. JANET EBERSOHN

Bsc. Hons. Environmental Management

Cell: 082 557 7122

e-mail: janet@ecoroute.co.za

Comments and Response Report

Proposed Construction of a Residential Dwelling on Erf 1256, St Francis Bay, Kouga Municipality, Eastern Cape

DEDEAT Ref. No: EC08/C/LN1&3/M/45-2022

Pre-Application comments received

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The Department of Forestry, Fisheries, and the Environment (DFFE), Branch Oceans & Coasts (O&C) – 21/06/2022

Comments

SUBJECT: COMMENTS ON THE BACKGROUND INFORMATION DOCUMENT PRE-APPLICATION ENVIRONMENTAL PROCESS FOR THE PROPOSED CONSTRUCTION OF A RESIDENTIAL DWELLING ON ERF 1256, SEA VISTA, ST FRANCIS BAY, EASTERN CAPE.

The Department of Forestry, Fisheries, and the Environment (DFFE), Branch Oceans & Coasts (O&C) appreciates the opportunity granted to comment on the Background Information Document (BID) Pre-application environmental process for the proposed construction of a residential dwelling on erf 1256, Sea Vista, St Francis Bay, Eastern Cape. The Branch O&C has provided recommendations in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), ("NEMA") and the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICM Act").

The Branch O&C has the mandate to ensure the holistic management of the coast and estuarine areas as an integrated system and promote coordinated coastal management. It ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of coastal zones are maintained to ensure that people, properties, and economic activities are protected against the impacts of dynamic coastal processes. Guided by the principles of integrated coastal management, the Branch O&C

Response

Noted, thank you.

promotes developments that promote socially justified sharing of benefits derived from a resource-rich coastal area and strives to ensure that the principles of sustainable development are upheld.

In the assessment and review of this application, the Branch O&C concludes that a decision regarding this application will be made during the subsequent environmental process when more information about the site and environmental constraints has been made available. The Branch O&C further requests to be registered as an I&AP in relation to the proposed construction of a residential dwelling on Erf 1256, Sea Vista, St Francis, Eastern Cape.

1. Comments & Recommendations for the Attention of the Environmental Assessment Practitioner (EAP) and Competent Authority (CA).

1.1 Erf 1256 is located within an estuarine functional zone. The Estuarine Functional Zone (EFZ) is defined as the area in and around an estuary which includes the open water area, estuarine habitat (such as sand and mudflats, rock and plant communities), and the surrounding floodplain area, as defined by the area below the 5 m topographical contour (referenced from the indicative mean sea level). The EFZ improves the environmental, cultural, social, and commercial value of estuarine environments and provides critical habitat and vital ecosystem services for plants, animals, and ecosystems. Taking this into account, caution needs to be applied when making decisions on developments that are in such vulnerable locations.

1.2 Contemporary literature and many case studies globally ascertain that coastal zone and estuarine environments are among the most vulnerable and exposed areas to coastal hazards. The risks range from flooding, erosion, sea-level rise as well as coastal storms. These impacts are far-reaching and are already changing the lives and livelihoods of coastal communities.

1.3 The Branch O&C brings to the attention of the EAP the need for technology in coastal engineering, climate vulnerability and risk assessment, and an estuarine impact assessment to inform decision-making processes associated with the property in question, including recommending mitigation measures to ensure that the property is planned according to good design standards that takes in into account climate change risk to mitigate unintended impacts.

1.4 The technology needed in coastal engineering should thoroughly assess all design, layout, technology, and material alternatives, It should provide detail on the type of stabilisation techniques required to ensure that the property will be protected from flood risk, erosion impacts, accretion, and advice on the construction method which could be adopted to mitigate risks to neighboring properties while not compromising estuarine functioning and/or current stabilisation methods to improve coastal protection.

1.5 The stormwater and stormwater management system should be included in the subsequent report.

Noted. The Branch O&C has been registered as an I&AP and a copy of the Draft BAR will be made available to the Branch for comment.

The EAP is aware of that the proposed development is within the EFZ; however, the department must take into consideration that there is an existing dwelling on the property and no indigenous vegetation of sensitivity significance is present. Nevertheless, the EAP has provided recommendations and mitigation measures to ensure that the adjacent canal will be protected throughout the demolition and construction phases.

Noted and agreed.

The EAP would like to make the department aware that the design and construction of houses along the Marina Glades Canal is strictly monitored by the St Francis Homeowners Association, together with the Kouga Local Municipality. The St Francis Bay Riparian Homeowners Association (SFBRHOA) currently maintain the marina canal system on behalf of the Kouga Local Municipality in terms of a formal agreement between the two parties. The SFBRHOA oversee the maintaining of the canal wall which borders all properties to ensure that all properties are protected from coastal hazards. This canal wall has recently been upgraded.

In addition, the Kouga Local Municipality has recently undertaken a project to protect the St Francis Bay beach "spit" from further erosion caused by coastal events. The project included beach nourishment, revetment construction, and the construction of groynes. This will aid in the protection of the homes along the canal against coastal hazards.

If the applicant intends to utilize municipal services such as electricity connections, water services, stormwater connections, building plan approvals, etc., all relevant authorizations should be obtained from the relevant departments before commencement with any/all construction-related activities. The applicant should strive to ensure sustainable development and that all building-related activities, leveling and construction are in line with all relevant environmental laws and legislation.

1.6 The Branch O&C further cautions that the disposal of construction waste, rubble, and/or unwanted material or debris in the estuary/canal. The Basic Assessment Report or EMP should clearly articulate how construction rubble and waste will be disposed of throughout all stages of construction and post-construction to avoid any pollution entering the marine and coastal environment.

Kindly note that the Department reserves the right to revise its comments and request further information based on any additional information received. All correspondence, documentation, and/or requests (hard copy or electronic copy) should be submitted to our office via OCEIA@dffe.gov.za / or Physical Address: Department of Forestry, Fisheries & the Environment (DFFE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.

The EMPr attends to matters involving the obtaining of permits and approvals from the necessary authorities prior to construction. This includes the need for method statements to be provided to the appointed ECO for stormwater management, etc.

This has been addressed in the EMPr.

Noted, thank you.