



Public Participation Process Report

Proposed Dredging of the Milnerton Lagoon in the Diep River Estuary, Cape Town

DEADP REFERENCE: 16/3/3/1/A1/18/3048/25

VERSION: Final

DATE: 28 January 2026

APPLICANT

City of Cape Town



PREPARED BY

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DOCUMENT DETAILS

PROPOSED DREDGING OF THE MILNERTON LAGOON IN THE DIEP RIVER ESTUARY, CAPE TOWN: PUBLIC PARTICIPATION PROCESS REPORT

APPLICANT

City of Cape Town

ENVIRONMENTAL ASSESSMENT PRACTITIONER

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Report purpose

In accordance with the Environmental Impact Assessment Regulations, the purpose of the Public Participation Report is to:

- Present the issues and concerns identified to date from the stakeholder engagement process, together with an explanation of how these issues will be addressed.
- Document the means of notification of potential Interested and Affected Parties and members of the public of the proposed activities.
- Document consultation with organs of state regarding the proposed application.

Authors

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1 INTRODUCTION

1.1 BACKGROUND

The water quality in the Milnerton Lagoon has declined significantly in recent years due to high levels of pollution and other anthropogenic impacts. Organic sediment accumulated in the lower lagoon between 2021 – 2022 due to limited tidal exchange, resulting in low dissolved oxygen and the production of a sulphurous odour (associated with bacterial decomposition of organic material in anoxic environments). Simultaneously there was a decline in the water quality inputs from Potsdam and Theo Marais canal. Dredging was proposed as a remediation measure in the 2023 Remediation Plan for the Milnerton Lagoon to address the accumulation of organic material, but between 2023 and 2024 there were multiple flood events which scoured the system, removing most of the accumulated organic sediment out to sea. Despite this, dissolved oxygen levels in the lagoon remained poor, and this has been attributed to the continuous high loading of polluted inflows.

Dredging of the lower section of the lagoon is now being proposed with the intention to improve hydrodynamic functioning and tidal exchange, facilitating increased oxygenated seawater intrusion into the lower reaches of the system and preventing the excessive accumulation of sediment. For more information regarding the proposed dredging please refer to the background and introduction provided on pages 3-8 of the final Basic Assessment Report (BAR). The preferred alternative is shown in Figure 1 below.

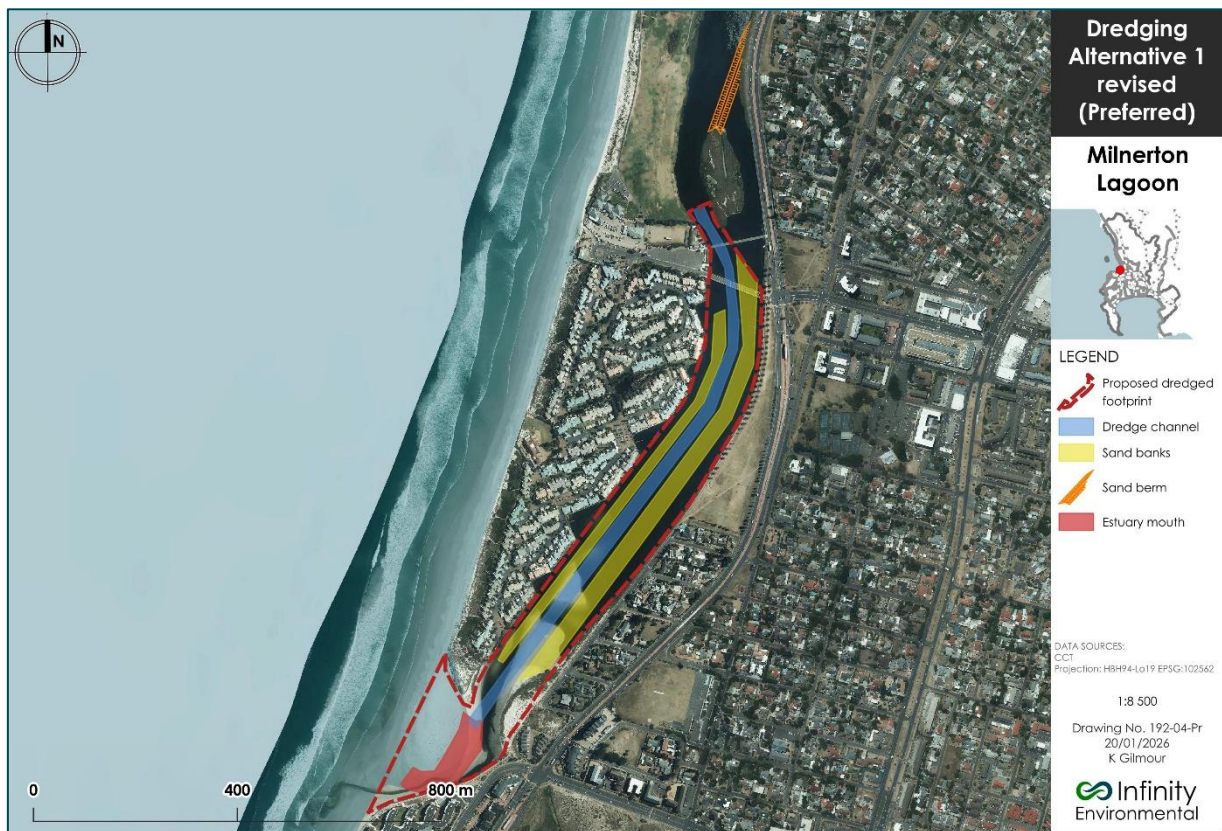


Figure 1: Schematic of the final preferred alternative, illustrating the proposed dredging zone (blue polygon) in the lower Milnerton Lagoon, with the excavated material placed as sandbanks (yellow polygons). The proposed sand berm is highlighted in orange, while the dotted outline depicts the precise footprint of the dredged area.

The proposed activity is the dredging (with or without off-site disposal) of the lower section of the Milnerton Lagoon from just upstream of the Loxton Road bridge to the estuary mouth with the placement of dredged sediment along channel margin(s). Up to 30 000 m³ of material will be moved within the lagoon to achieve this during the dredging phase of the project, and up to 120 000 m³ during the post-dredging phase to maintain the scoured depth of the dredged channel and an open estuary mouth in accordance with the MMP (see **Appendix H2** of the BAR), as and when needed to ensure the hydrodynamic function of the lower lagoon is maintained. Furthermore, should partial off-site disposal be the implemented design and layout alternative then the dredged material would be separated by cyclone, with clean sand returned to the lagoon (i.e., with placement of sediment particularly on the eastern bank of the channel) and approximately 6 000 m³ of nutrient-enriched fine sediments dewatered and removed off-site.

1.2 ENVIRONMENTAL ASSESSMENT PROCESS

The proposed dredging of the Milnerton Lagoon involves activities listed in terms of the Environmental Impact Assessment (EIA) Regulations of 2014, as amended, and the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended (NEMA) and therefore requires Environmental Authorisation (EA) from the Department of Environmental Affairs and Development Planning (DEA&DP), and a Basic Assessment (BA) must be undertaken by an Environmental Assessment Practitioner (EAP). Infinity Environmental is the appointed EAP and is responsible for managing the environmental assessment process.

Public participation and authority consultation are integral to the environmental assessment process. The proposed application for EA therefore required a comprehensive public participation process (PPP) in accordance with Regulation 41 of the EIA Regulations of 2014, as amended, which was undertaken and is documented within this report.

1.3 PURPOSE OF PUBLIC PARTICIPATION

Public participation is a critical informant of environmental assessment and should include consultation with state departments as well as with the interested and affected parties (I&APs). Guidelines on public participation in terms of Regulation 41 the NEMA EIA Regulations of 2014 (as amended), published by the Department of Environmental Affairs in 2017, note that public participation should facilitate the following:

- » The opportunity to obtain clear, accurate and understandable information about the environmental impacts;
- » The opportunity for role-players to identify mitigation and enhancement measures;
- » The means to incorporate the needs, preferences and values of I&APs;
- » The opportunity to clear up misunderstandings, resolve disputes and reconcile conflicting interests;
- » Encouragement of transparent and accountable decision-making; and
- » Procedural fairness of administrative action.

1.4 PUBLIC PARTICIPATION REQUIREMENTS

41. (1) This regulation only applies in instances where adherence to the provisions of this regulation is specifically required.

(2) The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of an application or proposed application which is subjected to public participation by—

(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of—

(i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and

(ii) any alternative site;

(b) giving written notice, in any of the manners provided for in section 47D of the Act, to—

i. the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken and to any alternative site where the activity is to be undertaken;

ii. owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken and to any alternative site where the activity is to be undertaken;

iii. the municipal councillor of the ward in which the site and alternative site is situated and any organisation of ratepayers that represent the community in the area;

iv. the municipality which has jurisdiction in the area;

v. any organ of state having jurisdiction in respect of any aspect of the activity; and

vi. any other party as required by the competent authority;

(c) placing an advertisement in—

i. one local newspaper; or

ii. any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;

(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official Gazette referred to in paragraph (c)(ii); and (e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to—

(i) illiteracy;

(ii) disability; or

(iii) any other disadvantage

(3) A notice, notice board or advertisement referred to in subregulation (2) must—

(a) give details of the application or proposed application which is subjected to public participation; and

(b) state—

(i) whether basic assessment or S&EIR procedures are being applied to the application;

(ii) the nature and location of the activity to which the application relates; (iii) where further information on the application or proposed application can be obtained; and (iv) the manner in which and the person to whom representations in respect of the application or proposed application may be made. (4) A notice board referred to in subregulation (2) must— (a) be of a size of at least 60cm by 42cm; and

(b) display the required information in lettering and in a format as may be determined by the competent authority.

Register of interested and affected parties

42. A proponent or applicant must ensure the opening and maintenance of a register of interested and affected parties and submit such a register to the competent authority, which register must contain the names, contact details and addresses of— (a) all persons who, as a consequence of the public participation process conducted in respect of that application, have submitted written comments or attended meetings with the proponent, applicant or EAP;

(b) all persons who have requested the proponent or applicant, in writing, for their names to be placed on the register; and (c) all organs of state which have jurisdiction in respect of the activity to which the application relates.

43. (1) A registered interested and affected party (I&AP) is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the I&AP discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application. (2) In order to give effect to section 24O of the Act, any State department that administers a law relating to a matter affecting the environment must be requested, subject to regulation 7(2), to comment within 30 days.

Comments of interested and affected parties to be recorded in reports and plans

44. (1) The applicant must ensure that the comments of interested and affected parties are recorded in reports and plans and that such written comments, including responses to such comments and records of meetings, are attached to the reports and plans that are submitted to the competent authority in terms of these Regulations.

(2) Where a person desires but is unable to access written comments as contemplated in subregulation

(1) due to—

(a) a lack of skills to read or write;

(b) disability; or

(c) any other disadvantage; reasonable alternative methods of recording comments must be provided for.

2 PUBLIC PARTICIPATION PROCESS

This section documents the PPP that included a 30-day commenting period on the Draft BAR.

A notification and comment process commenced on Wednesday, 05 November 2025 and ended on Friday, 05 December 2025. Potential I&APs were notified and invited to register and comment on the Draft BAR and its associated appendices.

2.1 WRITTEN NOTICE TO POTENTIAL I&APs

Estate manager notifications

The residential and business areas surrounding the site consist of various restricted-access estates, complexes and buildings including:

- Woodbridge Island (west of the site);
- Sunstays Lagoon Beach Apartments (south of the site);
- Lagoon Beach Office Park / Office on the Beach (south-east of the site);
- Lagoon Beach Hotel (south-east of the site);
- Beauty of the Cape Luxury Apartments (south-east of the site);
- Island View Estate (south-east of the site);
- The Milnerton Golf Club (north-west of the site);
- Walborough complex (north-east of the site);
- Arnhem complex (north-east of the site);
- Atlantica complex (north-east of the site); and
- Palo Alto complex (north-east of the site).

In accordance with Section 41 (b)(ii) of the NEMA, the estate managers (*'persons in control of the land'*) were notified via email of the publication of the draft BAR and associated comment period and requested to share that information with their respective tenants, homeowners or members (see **Appendix 1**).

Specifically for those complexes that had a website with phone contact details, the estate manager was contacted via phone call prior to the email notification being sent, and confirmation of the notification being shared with their respective tenants was requested (see example below).

[redacted for privacy]

Bulk email

Organs of State and potential I&APs were notified via bulk email (using 'Brevo') of the Draft BAR commenting period – see below.



Notification of Public Participation
APPLICATION FOR ENVIRONMENTAL AUTHORISATION
Department of Environmental Affairs and Development Planning Reference
No.: **16/3/3/1/A1/18/3048/25**
PROPOSED DREDGING OF MILNERTON LAGOON, DIEP RIVER ESTUARY,
CAPE TOWN
05 NOVEMBER 2025

Dear Stakeholder,

You have been identified as a potential interested and affected party (I&AP) for a public participation process regarding the proposed dredging of the Milnerton Lagoon in the Diep River Estuary, Cape Town.

Application has been made in terms of the National Environmental Management Act, 1998 (Act No. 107 of 198), as amended, and the Environmental Impact Assessment Regulations of 2014, as amended, for Listing Notice 1 (GN327 of 2017), Activities 15 and 19A, as well as Listing Notice 3 (GN324 of 2017), Activity 14.

A public participation process will commence on Wednesday, 05 November 2025, ending on Friday, 05 December 2025.

You are invited to comment on the draft Basic Assessment Report and its associated appendices, which are available online at www.infinityenv.co.za/public/milnertonlagoondredging or on request from the Environmental Assessment Practitioner at the details below.

For more information, to comment, or to arrange alternative ways of participating, please contact the Environmental Assessment Practitioner, **Jeremy Rose of Infinity Environmental**:

Email: milnertondredging@infinityenv.co.za

Phone: (021) 834 1600

WhatsApp: 060 524 7676

Website: www.infinityenv.co.za/public/milnertonlagoondredging

Notification Reminders:

- I&APs were reminded to attend the Public Open House Meeting via BREVO email and sms notification sent on 19 November 2025 (refer to Appendix 1).
- Organs of State were reminded to comment on the Draft BAR via email sent on 04 December 2025.

Proof of notification via bulk emails is provided under Appendix 1 [redacted for privacy]

2.2 MUNICIPAL COUNCILLORS

The following municipal councillors were notified of the public comment period on the Draft BAR via email sent on 05 November 2025, at the details below.

Ward	Councillor	Email
Ward 55	Fabian Ah-Sing	Fabian.AhSing@capetown.gov.za
Sub-council 16	Girshwin Fouldien (sub-council manager)	Subcouncil.16@capetown.gov.za

2.3 ORGANS OF STATE

Organs of State were notified of the application by email. Contact details are provided below.

Organ of State	Contact Person	Email
Department of Forestry, Fisheries and the Environment (DFFE): Oceans and Coast Branch	Reuben Molale	RMolale@dffe.gov.za
	Tabisile Mhlana	tmhlana@dffe.gov.za
	Jessica Mans	JeMans@dffe.gov.za
	Makwarela Mnwana	mnwana@dffe.gov.za
	Mr Ryan Peter Ms Makwarela Mnwana	Oceia@environment.gov.za ; JPeter@dffe.gov.za
Department of Environmental Affairs and Development Planning (DEA&DP): Development Management Directorate	Eldon van Boom	eldon.vanboom@westerncape.gov.za
	Zaahir Toefy	Zaahir.Toefy@westerncape.gov.za
	Taryn Dreyer	Taryn.Dreyer@westerncape.gov.za
	Rondine Isaacs	Rondine.Isaacs@westerncape.gov.za
DEA&DP: Pollution and Chemicals Management Directorate	Catherine Bill	Catherine.Bill@westerncape.gov.za
	Natasha Davis-Wolmerans	Natasha.Davis-Wolmarans@westerncape.gov.za
DEA&DP: Waste Management Directorate	Lance McBain-Charles	Lance.McBain-Charles@westerncape.gov.za
DEA&DP: Biodiversity and Coastal Management	Iepteshaam Bekko	iepteshaam.bekko@westerncape.gov.za
	Marlene Laros	marlene.laros@westerncape.gov.za
	Mercia J Liddle	Mercia.Liddle@westerncape.gov.za
DEA&DP: Environmental Law Enforcement	Achmad Bassier	Achmad.Bassier@westerncape.gov.za
	Dale Wakefield	Dale.Wakefield@westerncape.gov.za
DEA&DP: Air Quality Management	Russel Mehl	Russell.Mehl@westerncape.gov.za

Organ of State	Contact Person	Email
DEA&DP: Environmental Compliance	Ayub Mohamed	Ayub.Mohamed@westerncape.gov.za
Department of Water and Sanitation	Nelisa Ndobeni	NdobeniN2@dws.gov.za
City of Cape Town (CoCT) Municipality: Environmental Compliance Branch	Linda Ndlela Keith Wiseman	linda.ndlela@capetown.gov.za Keith.Wiseman@capetown.gov.za
CoCT Municipality: Water and Sanitation	Stefan Milandri Sven Sotemann Caashief Adams Thembakazi Gobodo	stefan.milandri@capetown.gov.za Sven.Sotemann@capetown.gov.za Caashief.Adams@capetown.gov.za Thembakazi.gobodo@capetown.gov.za
CoCT Municipality: Environmental Management Department	Sonja Warnich-Stemmet Chandre Rhoda Layton Makhathini	sonja.warnichstemmet@capetown.gov.za chandre.rhoda@capetown.gov.za layton.makhathini@capetown.gov.za
CapeNature	Ismat Adams	iadams@capenature.co.za
Heritage Western Cape		ceoheritage@westerncape.gov.za or hwc.hwc@westerncape.gov.za
Department of Public Works and Infrastructure	Sifiso Mdakane Dumisani Gqibela	dg.pa@dpw.gov.za Dumisani.gqibela@dpw.gov.za

2.4 RATEPAYERS' AND OTHER HOMEOWNERS' ASSOCIATION

The following ratepayers' associations for the surrounding areas were notified of the public comment period on the Draft BAR via email sent on 05 November 2025:

Organisation	Contact	Email
Milnerton Central Resident Association	Estuary Advisory Forum (Caroline Marx)	[redacted for privacy]
Brooklyn, Ysterplaat and Rugby Residents Association		
Century City Property Owners Association	CW Green JAL Chapman Chris S McMaster	

Edgemead Residents Association		
Bothasig Residents Association		
Plattekloof, Welgelegen, Panorama and Kleinbosch Ratepayers Association		
Maitland Residents and Ratepayers Association		
Table View Ratepayers Association		
Tijgerhof Residents Association		
Sunset Beach Home Owners Association		

2.5 CONSERVATION BODIES

The following heritage conservation bodies registered with Heritage Western Cape for the surrounding areas were notified of the public comment period on the Draft BAR via email sent on 05 November 2025:

Organisation	Contact	Email
Aikonese Cochoqua Khoi Tribal Council: Grazing Routes and Settlements (Kraals)Geo	Kevin Maart	[redacted for privacy]
Friends of Blaauwberg Conservation Area (FoBCA)	Roy Fuller-Gee	
Friends of Rietvlei	Pauline Potton	
Durbanville Heritage Society		

2.6 ADDITIONAL STAKEHOLDERS

The following additional stakeholders were notified of the public comment period on the Draft BAR via email sent on 05 November 2025.

Adjacent landowners / Potential I&APs	Email
Milnerton Canoe Club	[redacted for privacy]
Milnerton Aquatic Club	
Milnerton Lifesaving Club	
Milnerton Golf Club	
Sunset Links Residential Estate	
Mira Beach Club	
Cape Lagoon Villa	
Wang Thai restaurant	
Cotswold Guest House	
Woodbridge Lodge Guest House	
Lagoon Beach Office Park	
Zonnekus Guest House	
Milnerton Golf Club	
Bossa Milnerton	
Beach Blanc	
Sanctuary Guesthouse	
Capri restaurant	
Milnerton Lifesaving	

Proof of notification of municipal councillors, organs of state, ratepayers' associations and other potential I&APs is provided under Appendix 1 [redacted for privacy].

2.7 NOTIFICATION VIA LETTER DROP-OFF

Adjacent landowners were notified of the opportunity to comment on the Draft BAR and its associated appendices via knock-and-drop letters on Wednesday, 05 November 2025, providing adjacent landowners and occupiers with a background information document as below, which contained the respective steps to take in order to participate on the project and provide input during the respective commenting period.

NOTIFICATION OF PUBLIC PARTICIPATION PROCESS
BASIC ASSESSMENT
PROPOSED DREDGING OF THE MILNERTON LAGOON IN THE DIEP RIVER ESTUARY, CAPE TOWN

Dear stakeholder,

Notice is hereby given of a Public Participation Process in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended (NEMA) and the Environmental Impact Assessment (EIA) Regulations of 2014, as amended.

You have been identified as a potential interested and affected party (I&AP) in the Basic Assessment process for the Proposed Dredging of the Milnerton Lagoon within the lower reaches of the Diep River Estuary.

Water quality in the lagoon has declined significantly in recent years due to high levels of pollution and other anthropogenic impacts. The effects of poor water quality in the estuary include a sulphurous odour and discoloured water, due to high levels of suspended solids and extremely low oxygen levels.

The City of Cape Town intends to **dredge in the lower section of the Milnerton Lagoon from just upstream of the Loxton Road bridge to the estuary mouth with the placement of dredged sediment along channel margins**. The proposed dredging is intended to:

- increase the exchange of saline and fresh water in the lower lagoon; and
- create raised intertidal mudflats exposed to air, increasing the sediment oxygen levels and aiding in the reduction of sulphurous odours.

Application has been made for an **Environmental authorisation** to undertake listed activities in terms of the NEMA and EIA Regulations of 2014, as amended:

- **Activity 15 of Listing Notice 1 (GN327 of 2017):** Development of structures in the coastal public property where the development footprint is bigger than 50 square metres;
- **Activity 19A of Listing Notice 1 (GN327 of 2017):** The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from an estuary;
- **Activity 14 of Listing Notice 3 (GN324 of 2017):** The development of infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— (a) within a watercourse; or (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse;
 - i. Western Cape
 - i. Outside urban areas:
 - (aa) A protected area identified in terms of NEMPAA.

Infinity Environmental (Pty) Ltd. has been appointed as the independent environmental assessment practitioner (EAP) to undertake a Basic Assessment of the proposed dredging activity. All identified potential I&APs are being informed of the proposal and the opportunity to comment on the **Draft Basic Assessment Report (BAR) and its associated appendices**.



The Draft BAR will be made available for review and comment from **Wednesday, 05 November 2025**, online at www.infinityenv.co.za/milnertonlagoondredging or on request from the EAP at the details below. A hard copy of the Draft BAR and its appendices will also be made available at the **Milnerton Public Library** (located on 81 Pienaar Road) from **Wednesday, 05 November 2025** for a period of 30 days.

We request any members of the public who feel they are affected by or have an interest in the proposed project, to comment on the Draft BAR and to register as I&APs. All registered I&APs will receive communication regarding the proposed project and will be notified of any future opportunities for comment. I&APs are required to provide contact information and a declaration of any interest they may have in the application to register.


The comment period for the Draft BAR will end on Friday, 05 December 2025.

You are **also invited to attend the public Open House meeting** at the Italian Club of Cape Town, 16 Donegal Street, Rugby, Cape Town, 7405, between 16:00 pm - 19:00 pm on **Wednesday, 19 November 2025**. Arrive at any time that suits you.

Get in touch or find out more:

- ✉ milnertondredging@infinityenv.co.za
- 🌐 infinityenv.co.za/milnertonlagoondredging
- ☎ 021 834 1602
- ☎ 060 524 7676

For more information, to comment, or to arrange alternative ways of participating, please contact the EAPs, **Jeremy Rose** or **Tayla Hobson** or **Kelly Gilmour** of Infinity Environmental, at the details above. If you register or comment, we are required by the EA Regulations of 2014, as amended, and the NEMA to collect and process certain personal information as defined in the Protection of Personal Information Act, 2013 (Act No. 04 of 2013), as amended, including your name and your comments. These will be securely stored by Infinity Environmental and will be provided to the authorities and any appellants if a decision is appealed. You may at any time access or rectify this information by contacting us on info@infinityenv.co.za. Visit www.infinityenv.co.za/legal to view our Privacy Policy.



Proof of knock-and-drop background information document delivery is provided under Appendix 1 [redacted for privacy].

2.8 MEDIA AND SITE NOTICES

Media Notification

A media notice was published in the local community newspaper (*TableTalk*) on Wednesday, 05 November 2025.

NOTIFICATION OF PUBLIC PARTICIPATION PROCESS
Basic Assessment
Proposed Dredging of the Milnerton Lagoon in the Diep River Estuary,
Cape Town, Western Cape

The City of Cape Town, Environmental Management Department: Biodiversity Management Branch, proposes dredging the lower reaches of the Milnerton Lagoon to reshape the channel profile and enhance tidal exchange.

Application has been made to the Department of Environmental Affairs and Development Planning for an Environmental Authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment Regulations of 2014, as amended, to undertake the following listed activities:

- Listing Notice 1 (GN327 of 2017), as amended: Activity 15 and 19A
- Listing Notice 3 (GNR 324 of 2017), as amended: Activity 14

Opportunity to participate: Interested and affected parties (I&APs) are hereby invited to register and provide comments on the Draft Basic Assessment Report (BAR) and its associated appendices, which are made available at www.infinityenv.co.za/milnertonlagoondredging, the Milnerton Public Library (Pienaar Street, Milnerton) or on request from the Environmental Assessment Practitioner at the details indicated below. When registering or commenting, please provide your name, contact details, and an indication of any business, financial, personal, or other interest you may have in the application. **The Draft BAR and its appendices are made available for a minimum 30-day comment period from Wednesday, 05 November 2025 until Friday, 05 December 2025.**

I&APs are also invited to a **Public Open House** at the **Italian Club of Cape Town (16 Donegal Street, Rugby, Cape Town, 7405)** on **Wednesday, 19 November 2025** at any time between **16h00 to 19h00** to learn more about the application and/or provide input.

SCAN
HERE FOR
MORE
DETAILS



For more information, to comment, or to arrange alternative ways of participating, please contact the Environmental Assessment Practitioner, Jeremy Rose at:

 milnertondredging@infinityenv.co.za	 060 524 7676
 www.infinityenv.co.za/milnertonlagoondredging	 021 834 1600




Proof of the media notice published in the *Tabletalk* newspaper is in Appendix 2.

Site notification

Three site notices were placed on the edges of the site on Wednesday, 05 November 2025 as follows:

- One site notice was placed to the south of the entrance to the Loxton Road bridge off Marine Drive;
- Another site notice was placed along the eastern edge of the lagoon, near the outdoor gym on the public open space park area alongside the lagoon; and
- A third site notice was erected near the south-eastern edge of the lagoon along the parking lot off Lagoon Beach Drive.

NOTIFICATION OF PUBLIC PARTICIPATION PROCESS

Basic Assessment

Proposed Dredging of the Milnerton Lagoon in the Diep River Estuary, Cape Town, Western Cape

Project proposal: The City of Cape Town proposes the dredging of the lower reaches of the Milnerton Lagoon to reshape the channel profile and enhance tidal exchange.

Application has been made to the Department of Environmental Affairs and Development Planning for Environmental Authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended and the Environmental Impact Assessment Regulations of 2014, as amended, to undertake the following listed activities:

- Listing Notice 1 (GN327 of 2017), as amended: Activity 15 and 19A
- Listing Notice 3 (GN324 of 2017), as amended: Activity 14


Opportunity to participate: Interested and affected parties (I&APs) are hereby invited to register and provide comments on the Draft Basic Assessment Report (BAR) and its associated appendices, which are made available at www.infinityenv.co.za/milnertonlagoondredging, the Milnerton Public Library (Pienaar Street, Milnerton) or on request from the Environmental Assessment Practitioner at the details indicated below. When registering or commenting, please provide your name, contact details, and an indication of any business, financial, personal, or other interest you may have in the application. **The Draft BAR and its appendices are made available for a minimum 30-day comment period from Wednesday, 05 November 2025 until Friday, 05 December 2025.**

I&APs are also invited to a **Public Open House at the Italian Club of Cape Town on Wednesday, 19 November 2025** at any time between **16h00 to 19h00** to learn more about the application and/or provide input.



For more information, to comment, or to arrange alternative ways of participating, please contact the Environmental Assessment Practitioner, Jeremy Rose:

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 060 524 7676

 www.infinityenv.co.za/milnertonlagoondredging

 021 834 1600



SCAN
HERE
FOR
MORE
DETAILS



Proof of the site and media notice placement is provided under Appendix 2

2.9 AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT

The draft BAR was circulated to identified potential I&APs and made available to the public online on Infinity's website at <https://www.infinityenv.co.za/public/milnertonlagoondredging>.

Public participation

Documents and information about current public participation processes can be accessed below.



Proposed Milnerton Lagoon Dredging

Public Participation / 04 November 2025

- Status: Draft Basic Assessment Report
- Reference Number: 16/3/3/1/A1/18/3048/25
- Authority: Department of Environmental Affairs and Development Planning
- Date of notice: 2025-11-05
- Closing date: 2025-12-05



PROPOSED DREDGING OF THE MILNERTON LAGOON IN THE DIEP RIVER ESTUARY, CAPE TOWN

The applicant, the City of Cape Town: Environmental Management Department Biodiversity Management Branch, is proposing to dredge the lower reaches of the Milnerton Lagoon. The main purpose of the dredging is to reshape the channel profile and enhance tidal exchange.

The proposed dredging of the lower section of the Milnerton Lagoon is proposed as an appropriate remediation activity aligned with existing approvals for the Diep River Estuary and is informed by the findings of the 2023 Remediation Plan (Rose et al., 2023).

<https://www.infinityenv.co.za/public/milnertonlagoondredging>

12/4/25, 2:01 PM

Proposed Milnerton Lagoon Dredging - Infinity

SITE DESCRIPTION AND BACKGROUND

The Milnerton Lagoon is the well-known lower part of the Diep River Estuary where the Diep River enters the sea at Lagoon Beach in Cape Town, and extends from the Otto du Plessis road bridge over the estuary to the mouth between Woodbridge Island and Lagoon Beach.

Water quality in the lagoon has declined significantly in recent years due to high levels of pollution and other anthropogenic impacts. The effects of poor water quality in the estuary include a sulphurous odour and discoloured water, due to high levels of suspended solids and extremely low oxygen levels.

PROJECT PROPOSAL

The City of Cape Town intends to dredge the lower section of the Milnerton Lagoon from just upstream of the Loxton Road bridge to the estuary mouth. The proposed dredging is intended to increase the exchange of saline and fresh water in the lower lagoon; and create raised intertidal mudflats exposed to air, increasing the sediment oxygen levels.

APPLICABLE LEGISLATION

Application is made for an environmental authorisation (Department of Environmental Affairs and Development Planning Reference No.: 16/3/3/1/A1/18/3048/25) to undertake listed activities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended, and Environmental Impact Assessment Regulations of 2014, as amended:

- Listing Notice 1 (GNR 327 of 2017): Activity 15 and 19 A
- Listing Notice 3 (GNR 324 of 2017): Activity 14

OPPORTUNITY TO PARTICIPATE

The 30-day commenting period for the draft Basic Assessment Report and its associated appendices commences on Wednesday, 05 November 2025 and will end on Friday, 05 December 2025.

Should you have any queries or concerns, you can contact the Environmental Assessment Practitioner, Infinity Environmental (Jeremy Rose, Tayla Hobson or Kelly Gilmour), using the following options:

- By sending an email to milnertondredging@infinityenv.co.za;
- By sending a WhatsApp message to 060 524 7676 or telephonically on 021 834 1600; and/or
- By completing the form on this page.

You are also invited to attend the **public Open House event taking place at the Italian Club of Cape Town** (16 Donegal Street, Rugby, Cape Town, 7405) between **16:00 pm - 19:00 pm on Wednesday, 19 November 2025**. Please come at any time that suits you.

Files can be accessed at the link below:

- 2025-11 Draft Basic Assessment Report for the proposed dredging of the Milnerton Lagoon

Register as an I&AP and provide comments by completing the form below (or otherwise by contacting the EAP at the details provided above):

<https://www.infinityenv.co.za/public/milnertonlagoondredging>

Current stakeholder engagement processes

Proposed Redevelopment of the Mowbray

Golf Course

Proposed Mixed-use Development on Erf

2187, Three Anchor Bay, Green Point

Hartleyvale Sports Precinct Contextual

Framework Plan

Strandfontein Pavilion Refurbishment

Current environmental public participation processes

Proposed Realignment of Protea Road,

Klapmuts North

Draft Scoping Report

Proposed Granger Bay Precinct Development

at the V&A Waterfront

Draft Scoping Report

Section 24G Application for clearance of

indigenous vegetation on Farm 974/1, Misty Cliffs

Section 24G Retrospective Environmental Authorisation Application

Proposed Milnerton Lagoon Dredging

Draft Basic Assessment Report

Proposed redevelopment of the Westlake

Conservation Centre

Final Basic Assessment Report

Proposed redevelopment of the Strand Street

Quarry, Cape Town

Appeal Decision

Dredging of Zeekoevlei in False Bay Nature

Reserve

Comment and Registration Form

You may request registration as an interested and affected party (I&AP) for this public participation process by filling in your name and contact information below.

Once you have entered your registration details, you may choose to enter or upload comments.

Please note that any comments submitted will be included in future versions of the report and publicly available. If you have any direct financial, business, personal or other interest in the application, please ensure you declare it below.

Your details

Personal information is gathered only for the purposes of facilitating public participation and is not used for any other purpose.

First name *

Surname *

Organisation

Email address

Cellphone Number

Postal Address

Preferred communication method *

Confirm your Registration *

Register as an interested and affected party

No, I do not wish to register, and understand that I will not receive any further updates on this process

Comments

<https://www.infinityenv.co.za/public/milnertonlagoonredging>

Environmental Audit Report

Proposed Dewatering and Discharge of

Groundwater on Erf 2189 - Green Point - Cape

Town

Water Use License Application

Proposed Development for the Stikland South

Hospital Site, Bellville

Draft Basic Assessment Report

Proposed Tafelsig Cemetery on Portion 60 of

CAS44, Tafelsig Mitchells Plain

Final Basic Assessment Report

Proposed R44/N1 Interchange Upgrade in

Klapmuts

Environmental Authorisation Granted

Coastal Setback Line for the Upgrading of

Long Barn Cottage, Miller's Point

Ad-Hoc Development Setback Line Adoption

Environmental Audit Report for the bulk

sewer outfall pipeline in Montague Gardens

Notice of External Audit

Amendment to Environmental Authorisation:

Montague Gardens Bulk Outfall Sewer

Amended Environmental Authorisation

You may submit comments in writing below, or upload a file (PDF, MS Word, or image). If you are not able to submit written comments, please contact us on 021 834 1600 to request assistance with alternative methods of commenting.

Comments

Upload your comments as an attachment

Drag and drop files here or

Personal Information and Privacy

We are required by the EIA Regulations, GNR 326 of 2017 and the National Environmental Management Act to maintain a register of interested and affected parties including of people who have commented, attended meetings, or requested registration. This requires us to collect and process certain personal information as defined in the Protection of Personal Information Act, 2013. The following personal information has been collected for the purpose of public participation from registered I&APs and will be collected from anyone who comments or registers:

- Name, contact details and address;
- A copy of any comments submitted; and
- Details of any interest declared in the granting or refusal of the application.

Should you register and/or comment, your name and your comments will be included in published documents. Your contact details, address, and interest declaration will be provided to the competent authority. Personal information will be stored by Infinity Environmental (Pty) Ltd at 2 Fir Street, Observatory 7925, and on a password-secured cloud storage system which may include servers in other countries. You may at any time request access to or rectify this personal information by contacting us on info@infinityenv.co.za.

INFINITY ENVIRONMENTAL (PTY) LTD

<https://www.infinityenv.co.za/public/milnertonlagoonredging>

Figure 2: Demonstration of Infinity Environmental's webpage for the proposed dredging of the Milnerton Lagoon, which included an online I&AP registration and comment form.

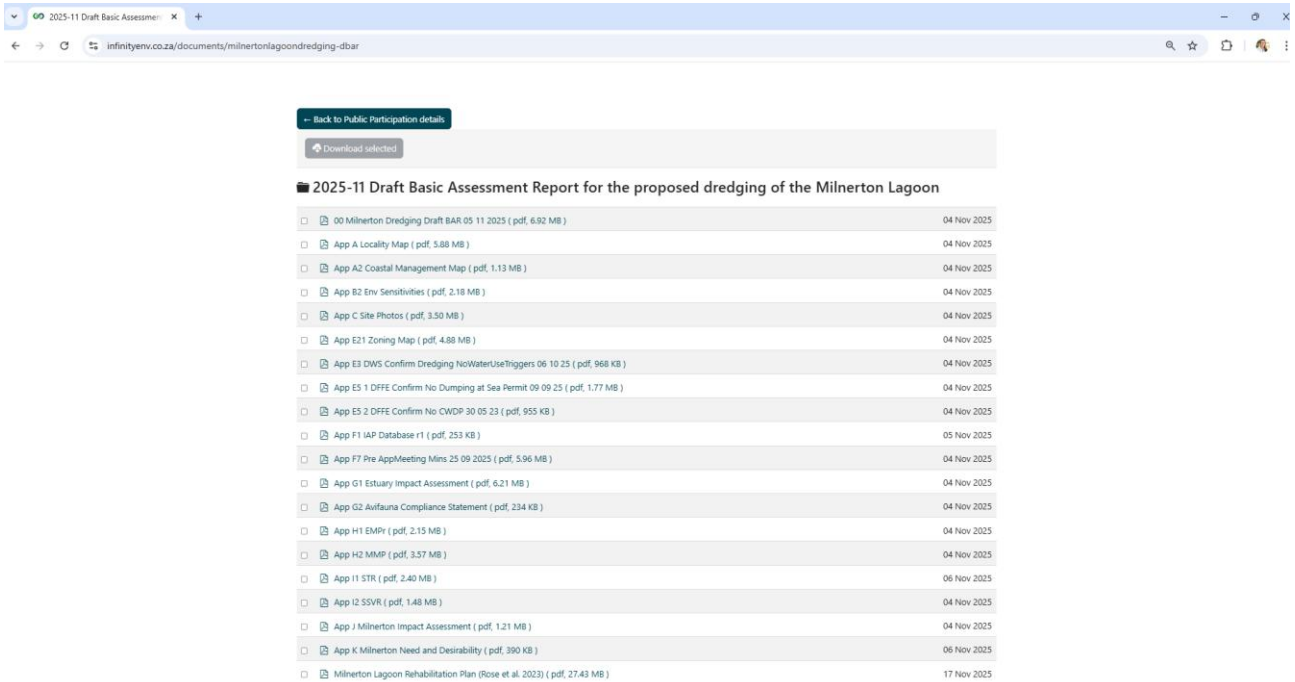
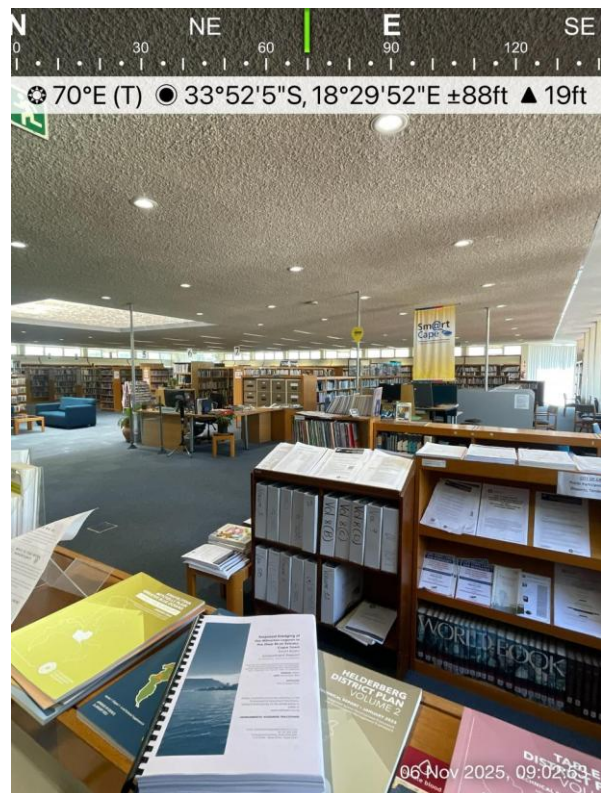
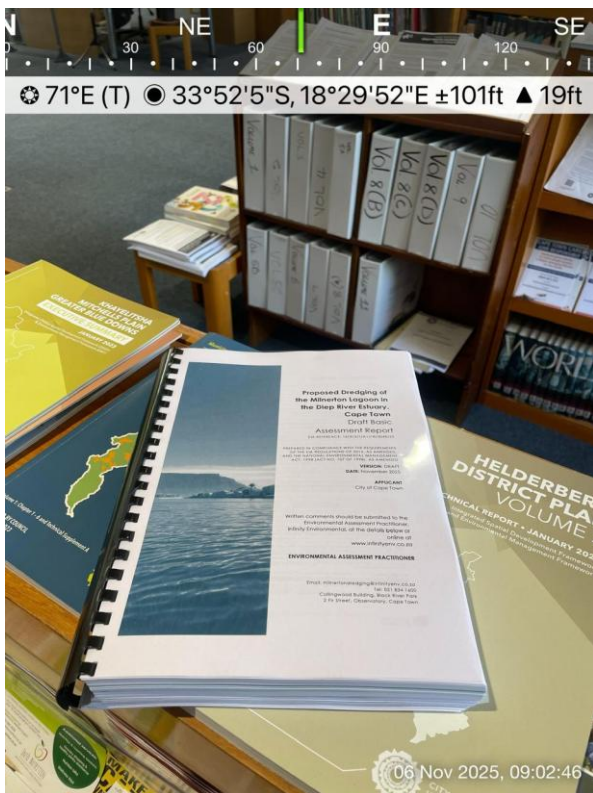


Figure 3: Infinity Environmental Webpage with downloadable documents (<https://www.infinityenv.co.za/documents/milnertonlagoondredging-dbar>).

A hard copy of the draft BAR was also made available at the Milnerton Public Library.



Proof of the library letter delivered along with the Draft BAR is provided under Appendix 3.

2.10 PUBLIC OPEN HOUSE EVENT

The notifications sent out on 05 November 2025 to potential Interested and Affected Parties (including the hand-delivered letters, project website, site notices and media notice) contained invitations to a Public Open House event hosted on Wednesday 19 November 2025 at the Italian Club in Milnerton, between 16:00 and 19:00.

Information about the project was displayed in poster format and the project team were present to engage and discuss with the public.



Figure 4. Open House photographs (19 Nov 2025)

3 COMMENTS AND RESPONSES TABLE

A 30-day public participation process was conducted. Notifications were distributed, and the 30-day PPP on the Draft BAR commenced on Wednesday, 05 November 2025 and ended on Friday, 05 December 2025. Comments and responses were captured and are recorded and responded to in the table below. Proofs of the comments received are in **Appendix 6 [redacted for privacy]**.

Table 1: Comments and Responses Table – Draft Basic Assessment Report and its Appendices

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
AUTHORITIES			
Rondine Isaacs – DEA&DP, Development Management By email, 05 December 2025			
A1		COMMENT ON THE DRAFT BASIC ASSESSMENT REPORT (“BAR”) FOR THE PROPOSED DREDGING OF THE MILNERTON LAGOON, DIEP RIVER ESTUARY	
	1.	The draft BAR received by this Department via electronic mail correspondence on 04 November 2025, and this Department's acknowledgement of receipt letter dated 13 November 2025, respectively, refer.	
	2.	This Directorate has considered the draft BAR and has the following comments:	
	2.1	Applicable listed activities:	
	2.1.1	It is herewith confirmed that Activity 14 of Listing Notice 3 of the Environmental Impact Assessment (“EIA”) Regulations, 2014 (as amended), is not applicable since the Milnerton Lagoon is not considered a watercourse in terms of the National Water Act, 1998 (Act No. 36 of 1998), as amended.	

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
	2.1.2	Page 48 of the BAR and pages 11 and 41 of the Maintenance Management Plan ("MMP") must therefore be amended to exclude Activity 14 of Listing Notice 3.	
	2.1.3	Please note that a revised Application form, which includes Activities 15 and 19A of Listing Notice 1, must be submitted to this Directorate.	A revised application form excluding activity 14 of listing notice 3 and including these listed activities has been submitted with the final BAR.
	2.1.4	Please ensure that the revised Application form is duly dated and signed by the applicant and appointed Environmental Assessment Practitioner ("EAP").	
	2.1.5	The revised Application form must be submitted with the final BAR.	
	2.2	Estuary Impacts	
	2.2.1	Based on the findings of the Estuarine Impact Assessment Modelling Report dated 2025 and compiled by Anchor Environmental, the modelling results suggest that it is unlikely that dredging will result in a significant improvement in tidal forcing in the Diep Estuary as a whole, and it is unlikely that the dredging activities will result in a change to the Estuarine Health Score of the system.	This interpretation is correct – the dredging is proposed as a remediation measure to address specific concerns but is not expected to alter the estuarine health of the entire system.
	2.2.2	Sixteen potential impacts were identified and assessed for the proposed 'dredge and move' activities (i.e., the movement of sediment from the channel to the intertidal banks) and the proposed 'dredge, clean and move' activities (i.e., the removal of sediment, as well as dewatering and enrichment of the estuary with the clean sediment). The impact ratings ranged from 10 (ten) impacts assessed as Low negative significance prior to mitigation, one (1) impact as insignificant (no mitigation required), one (1) impact of very low negative significance post mitigation and three (3) of medium negative significance post mitigation.	This impact assessment is correct. Minor adjustments have been made in the final BAR to respond to comments received.

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
	2.2.3	Operational phase impacts were assessed to be positive, meaning that they improved environmental conditions of the system in question. These impacts were either of Low positive significance, or Very Low positive significance.	
	2.2.4	All recommendations provided by the specialist must be included in the BAR and Environmental Management Programme ("EMPr").	All specialist recommendations are included, with the necessary integration and alignment.
	2.3	EMPr	
	2.3.1	The pages of the EMPr are not numbered, making it difficult for referencing purposes. Please ensure that the pages of the EMPr are numbered accordingly.	The final EMPr incorporates page numbering.
	2.3.2	Please ensure the application reference (Reference No.: 16/3/3/1/A1/18/3048/25) is included on the cover page of the EMPr.	The final EMPr incorporates the application reference.
	2.3.3	Although the MMP (Annexure A) is provided as a separate document, this need to be incorporated into the main EMPr document, as stated under Section 6 of the EMPr. The EMPr must therefore state that Annexure A is attached separately, or alternatively, all the appendices must be attached to the EMPr.	The MMP is intended to be adopted as a standalone document for ease of future use, but the references thereto have been corrected in the EMPr.
	2.4	MMP	
	2.4.1	The pages of the MMP are not numbered, making it difficult for referencing purposes. Please ensure that the pages of the MMP are numbered accordingly.	The final MMP incorporates page numbering.
	2.4.2	According to the MMP, Activity 15 of Listing Notice 1 and Activity 14 of Listing Notice 3 are applicable to the MMP. Please be advised that these activities do not contain an exclusionary provision pertaining to maintenance and are therefore not relevant. Further, Activity 14 of Listing Notice 3 is not applicable to the proposal, as advised in paragraph 2.1.1 above.	The MMP has been updated to include only activity 19A of listing notice 1.

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
	2.4.3	Please ensure that the MMP is amended to reflect Activity 19A of Listing Notice 1.	
	2.4.4	Page 13 of the MMP must be duly dated and signed by the applicant.	The final MMP is duly signed.
	2.4.5	Section 2.7 of the MMP (Public Participation) must be updated once the Public Participation Process on the draft BAR has been completed.	Section 2.7 of the final MMP is updated accordingly.
	2.4.6	Please ensure that Annexure A (Environmental Awareness Training Plan) is attached to the MMP.	Annexure A is attached to the MMP.
	2.5	General:	
	2.5.1	Please ensure that the Curriculum Vitae of the EAP who compiled the BAR (Mr. Jeremy Rose) is included in the final BAR.	The CV of the EAP is included as Appendix L to the final BAR.
	2.5.2	Please ensure that Appendix K (Need and Desirability) is duly completed and the final version of the Appendix is included in the final BAR.	In accordance with the Guideline on Need and Desirability (Department of Environmental Affairs, 2013), the principles outlined in Section 2 of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended (NEMA), and the general objectives of Integrated Environmental Management as set out in Section 23 of NEMA, were consulted during the preparation of Appendix K (Need and Desirability). The final Appendix K is included with the final BAR, without significant changes.

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
	2.5.3	Page 31 of the draft BAR refers to Annexure C of Appendix L1 (i.e., the 2022 Diep River Estuarine Management Plan). However, Appendix L1 has not been attached.	The reference to 'Annexure C of Appendix L1', namely the 2022 Diep River Estuarine Management Plan (EMP), was a typo in the Draft BAR, and the Appendix List did not include this document. This erroneous reference has been corrected within the Final BAR. The 2022 Diep River EMP is itself a public document, and need not be appended to the BAR, as we have not requested comment on this approved plan. It has been included as Appendix M to the final BAR for information purposes.
		<p>[clarification received from DEA&DP on 13 December 2025]</p> <p>Annexure C of Appendix L1, i.e., the 2022 Diep River Estuarine Management Plan was not included, but comment on this document was not requested, nor required. It is indicated reference to the document was a typo in the draft BAR, which will be corrected in the Final BAR. Although the 2022 Diep River EMP is a public document, it must be appended to the BAR, if reference thereto is made in the BAR.</p>	
	2.5.4	Page 49 of the draft BAR indicates that the preferred Site Development Plan is included in Appendix B1. However, Appendix B1 was not included in the link provided to this Directorate, nor is it available on the EAP's website.	Although page 49 of the draft BAR did indicate that the "preferred Site Development Plan (SDP) illustrating the preferred dredging alternative is included in Appendix B1", the Appendix list provided on pages 23-25 of the Draft BAR specifically

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			<p>indicates that the preferred SDP is in Figures 2 and 3 of the report itself. Hence, the reference to Appendix B1 on page 49, would consequently refer the reader to Figures 2 and 3 within the report. The reference to Appendix B1 on pg. 49 will be updated within the Final BAR to refer instead to the relevant figures so as to remove any confusion for the reader, but we do not believe this constitutes missing information requiring an additional public participation process.</p>
		<p>[response received from DEA&DP on 13 December 2025]</p> <p>Reference to Appendix B1 on page 49 of the final BAR will be updated to refer to the relevant figures. This does not constitute missing information requiring an additional Public Participation Process, since the SDP was provided within the BAR itself.</p>	<p>Thank you for confirming our understanding that there was no missing information in this regard.</p>
	2.5.5	<p>The Western Cape Provincial Spatial Development Framework, 2019 is the latest report. Please ensure that pages 50 and 51 of the draft BAR are updated to reference the 2019 report.</p>	<p>Section E 4.1 has been updated with reference to the 2020 amendments to chapter 4 of the 2014 provincial SDF. The 2020 amendments do not materially alter the policies referred to in the draft BAR.</p>
	2.6	<p>Declarations by applicant, EAP and specialists:</p>	<p>Signed declarations form part of the final BAR.</p>
	2.6.1	<p>You are hereby reminded to include the signed declarations from the applicant, EAP and specialists in the final BAR.</p>	

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
	2.7	Public Participation Process:	
	2.7.1	<p>Please provide proof of the Public Participation Process being conducted for the draft BAR circulated as part of the application phase. This will include (but is not limited to):</p> <ul style="list-style-type: none"> • Proof that the adjacent landowners, the ward councillor and relevant State Departments/organs of state were notified; • Proof that an advertisement was placed in the "Tabletalk" newspaper on 05 November 2025; • Proof that a notice was placed on the site; • Proof that the draft BAR was made available to registered interested and affected parties ("I&APs"); • A Comments and Responses Report, indicating all the comments received from I&APs on the draft BAR and the responses thereto; and • A complete list of registered I&APs. 	<p>Proofs of the public participation process, as listed here, are included in this Public Participation Process Report.</p>
	2.7.2	<p>It is anticipated that significant amendments are to be made to the draft BAR, since certain appendices have not been included, as indicated in paragraphs 2.5.3 and 2.5.4 above. You are advised to ensure that a revised draft BAR is circulated for comment to all organs of state and registered I&APs for an additional 30 days.</p>	<p>Considering that the 2022 Diep River EMP is a publicly accessible document, and Figures 2 and 3 of the Draft BAR replace the need for a stand-alone Appendix B1, those aspects mentioned in items 2.5.3 and 2.5.4 of the Department's comments do not (in our view) constitute any actual omission of information for interested and affected parties (I&APs). This information was in fact available to</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			I&APs during the Draft BAR comment period from Wednesday, 05 November 2025 to Friday, 05 December 2025.
		<p>[response received from DEA&DP on 13 December 2025]</p> <p>Considering the above, an amended draft BAR need not be made available to registered I&APs. However, if any I&AP/State Department/organ of state made substantive comments which require substantive changes, a revised draft BAR must be made available.</p>	Thank you for this confirmation. No substantive changes have been made in the final BAR other than those minor adjustments to the project proposal required to address I&AP comments, and it is not necessary to make a revised draft BAR available for further comment. The final BAR will be made available to I&APs for information purposes.
		<p>[response received from DEA&DP on 13 December 2025]</p> <p>If any substantive amendments are not required to the BAR, in terms of best practice, the final BAR inclusive of the Diep River Estuary Management Plan and Comments and Responses Report should be made available to registered I&APs for information purposes.</p>	As noted above, the Diep River EMP and comments and responses report form part of the final BAR being made available to registered I&APs for information purposes.
	3.	In accordance with Regulation 19(1) of the EIA Regulations, 2014 (as amended), the final BAR must be submitted within 90 days of receipt of the application by the Department, i.e., the final BAR must be submitted on or before 24 February 2026 .	The final BAR has been submitted for decision within the regulatory timeframe.
	3.1	Since significant new information must be added to 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	As noted above and confirmed in correspondence with the Department, no significant new

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		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.	information requiring additional public participation has been added to the BAR, and no additional time is required in this regard.
	3.2	Further note, in terms of Regulation 45 of the EIA Regulations, 2014 (as amended), an application in terms of the EIA Regulations, 2014 (as amended) lapses and the competent authority will deem the application as having lapsed, if the applicant fails to meet any of the timeframes prescribed in terms of these Regulations, unless extension has been granted in terms of Regulation 3(7).	These administrative requirements are noted.
	4	It is prohibited in terms of Section 24F of the National Environmental Management Act, 1998 (Act No. 107 of 1998) for a person to commence with a listed activity unless the competent authority has granted an environmental authorisation for the undertaking of the activity. A person convicted in terms of this prohibition is liable to a fine not exceeding R10 million or imprisonment for a period not exceeding ten years, or to both such fine and imprisonment.	
	5	Kindly quote the abovementioned reference number in any future correspondence in respect of this application.	
leptieshaam Bekko – DEA&DP, Control Environmental Officer: Biodiversity and Coastal Management Directorate – 10 December 2025			
A2		<p>RE: REQUEST FOR COMMENT FROM THE SUB-DIRECTORATE: COASTAL MANAGEMENT ON THE DRAFT BASIC ASSESSMENT PROCESS FOR THE PROPOSED DREDGING OF THE MILNERTON LAGOON IN THE DIEP RIVER ESTUARY, ERF 20315, CAPE TOWN.</p> <p>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 on 05 November 2025, refers.</p>	Noted.

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
	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".	The Applicant understands the mandate set out by the National Environmental Management: Coastal Management Act, 2008 (Act No. 24 of 2008), as amended (NEM:ICMA) and the delegation of the DEA&DP as the provincial lead agency for coastal management for the Western Cape Province.
	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 is available upon request.	We understand that the DEA&DP are implementing the Provincial Coastal Management Programme (PCMP), which is intended to provide all departments and organisations with integrated, coordinated and uniform approach to coastal management in the Province.
	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.	The prioritisation of the Estuary Management Programme within the PCMP is understood. The relevant guidelines, Estuarine Management Plan (dated 2022) and Mouth Management Plan have been considered for the compilation of this application

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			considering the site location within the Estuarine Functional Zone.
	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.	The objective to facilitate public access under the NEM:ICMA, and the availability of the Provincial Coastal Access Strategy and Plan (2017) and the coastal access audits is acknowledged.
	2	COMMENT	
		The sub-directorate: Coastal Management ("SD: CM") has reviewed the information as specified above and have the following commentary:	The project description outlined in items 2.1 – 2.3 is correct.
	2.1	Approximately 30 000 m ³ of material will be moved within the lagoon during the initial dredging phase of the project, and it is proposed that authorisation be granted for up to 120 000 m ³ in total, to allow for future maintenance of an open estuary mouth.	
	2.2	Dredging activities will create spoil sites.	The removal and dewatering of dredged material is considered in the alternatives (Section H of the final BAR), but please note that dewatering and offsite spoiling of material is not part of the preferred alternative which seeks to create a dredge channel with the dredge material placed on either side of the channel to form sand banks. Figure

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			2 on page 7 of the final BAR shows a schematic diagram of the preferred dredging alternative.
	2.3	The Estuarine Impact Assessment (prepared by Anchor Environmental Consultants (Pty) Ltd, Report No. 2214/3, dated 2025) states that the 2022 Estuarine Management Plan (EMP) notes that a “permanently open mouth state is preferred to avoid accumulation of nutrients and pathogens in the estuary”, and that there is an increased likelihood of mouth closure during drought conditions, which needs to be accounted for under climate change planning (City of Cape Town and Infinity Environmental 2022).	An open estuary mouth has been motivated for by the Estuarine Impact Assessment considering the assessment that tidal exchange is reduced when the mouth is partially closed. The proposal is consistent with the EMP, although it is not considered likely that the mouth would ever fully close under normal (non-drought) conditions.
	2.4	<p>Major infrastructure upgrades that will affect the proposed dredging project are underway, including:</p> <ul style="list-style-type: none"> • the upgrading and expansion of the Potsdam Wastewater Treatment Works (scheduled for completion by December 2027); • a capacity upgrade and construction of an overflow pond at Koeberg Road Pump Station (2027); • construction of the new Montague Gardens Bulk Sewer (2026); • rehabilitation of the Montague Drive Bulk Sewer (2027); • upgrades to the Phoenix Park Pump Station (2028); and, • upgrades to the Sanddrift East Pump Station (June 2027). 	The list of major infrastructure upgrades currently being undertaken by the City is correct.
	2.5	<p>The SD: CM recommends the following:</p> <p>a. The volume of material dredged must not compromise the functionality of the lagoon and must not exceed the maximum volume applied for. The Maintenance Management Plan must address the worst-case scenario.</p>	The Department's recommendations are noted. Hydrodynamic modelling was conducted by Anchor Environmental (Pty) Ltd. (refer to Appendix G1 of the BAR) to assess

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>b. Inclusion of dune rehabilitation and/or erosion management for spoil sites so that erosion protection measures ensure that impacts to the affected areas, especially the spoil sites are localised and remain minimal throughout the project.</p> <p>c. A description of how long-term management of the mouth opening will be addressed, especially during drier seasons and whether this entails regular mouth breaching must be included in the Maintenance Management Plan. While it is recognised that the estuary mouth, historically a seasonal system, needs to be kept permanently open to guarantee tidal forcing, the dredging activity is only estimated to last for five (5) months.</p>	<p>the impacts and function of the system under the proposed dredging scenario alternatives.</p> <p>Immediate post-dredging phase rehabilitation has been included under Section 6 of the EMPr specifically related to rehabilitation of the park area proposed for use for dewatering (should it occur). Considering the dune habitat will not be directly affected by the proposed dredging and dredged material is to be placed on the sides of the channel, at a height that would be inundated at high tide, inclusion of dune rehabilitation and/or erosion management for the lagoon is not deemed necessary.</p> <p>The MMP provides the long-term management plan for maintaining an open estuary mouth, i.e., during the post-dredging phase, which extends beyond the anticipated 5-month dredging phase. The EMPr and MMP are attached to the final BAR as Appendix H.</p>
	2.6	The SD:CM does not object to the proposed dredging of the Milnerton Lagoon in the Diep River estuary as it contributes to the remediation of the lagoon, provided that the mitigation measures as stipulated in the	The support for the proposed dredging is noted.

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		Environmental Management Programme (prepared by Infinity Environmental Pty Ltd, dated 03 November 2025) is adhered to, and that public access to the coast is not negatively impacted. While it is acknowledged that dredging activities may limit the area accessible to the public due to safety reasons, clear signage to this regard must be erected.	I&APs will be adequately notified of the proposed dredging at least 7 days prior to such activities taking place, with signage placed on site prior to commencement to warn I&APs for safety reasons – refer to section 4.2 of the EMPr.
	2.7	The SD:CM supports the recommendation made by the Environmental Assessment Practitioner (EAP) that any maintenance to restore or maintain the channel depth and an open estuary mouth is to be conducted strictly in accordance with the Maintenance Management Plan (MMP) and only when necessary to sustain hydrodynamic functioning of the lower lagoon.	Noted, with thanks.
	2.8.	The SD:CM supports the recommendation made by the EAP that dredging of the lower lagoon is preferable after some improvement in lagoon water quality occurs, ensuring that the intervention is concurrent with improvements in upstream water quality.	Support from the Department for the EAP's recommendations, considering the state of the water quality in the lower lagoon, is acknowledged.
	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.	The Applicant is aware of their general <i>Duty of Care</i> as defined under Section 38 of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended as well as similarly defined under Section 58 of the NEM:ICMA.

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	4.	The SD: CM reserves the right to revise its comments and request further information from you based on any information that may be received.	Noted.
Katy Spalding – CoCT, Environmental Professional: Environmental and Heritage Management Branch, Environmental Management Department, Spatial Planning & Environment Directorate – 05 December 2025			
A3		<p>(Email sent on 05 December 2025)</p> <p>Kindly refer to the attached collated City comment on the Draft BAR for the proposed dredging of Milnerton Lagoon.</p>	The collated City comment on the Draft BAR is hereby acknowledged and responded to below.
D. Georgeades – CoCT, Manager: Environmental and Heritage Management Branch, Environmental Management Department – 05 December 2025			
A4		<p>DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DREDGING OF THE MILNERTON LAGOON, DIEP RIVER ESTUARY (DEADP REFERENCE: 16/3/3/1/A1/18/3048/25)</p> <p>The Draft Basic Assessment Report (DBAR) for the proposed dredging of the Milnerton Lagoon, dated November 2025 and received from Infinity Environmental by email on 5 November 2025, refer.</p> <p>The following technical comment from the City of Cape Town has been provided:</p>	Departmental comments on the Draft BAR are responded to below.
	1.	Water and Waste Directorate: Water and Sanitation Department	
		<p>The Water and Sanitation Department has provided an overview of the existing water and sewer infrastructure near the proposed dredging.</p> <p><u>Water infrastructure</u></p> <ul style="list-style-type: none"> • 2 x 150mm reticulation mains crossing the Diep River close to Loxton Road • 1 x 75 mm reticulation crossing the Diep River close to Loxton Road 	The existing water and sewer infrastructure near the site are acknowledged, and the project engineers have engaged with the City's reticulation infrastructure to confirm whether the reticulation infrastructure does actually traverse the Diep River as indicated in the drawings attached to the City's

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		<p>The above-mentioned water mains must be taken into account during the dredging phase of the project. Refer to Annexure A, illustrating the existing water reticulation infrastructure.</p> <p><u>Sewer infrastructure</u></p> <ul style="list-style-type: none"> • 1 x 150 mm reticulation rising main crossing the Diep River along Loxton Road. <p>Refer to Annexure B, illustrating the existing sewer infrastructure.</p>	<p>comments to determine whether the proposed dredging would affect any service infrastructure – see Appendix 4 of this report below. Of particular interest are the water reticulation mains crossing the Diep River. In response to the engineer's email sent on 09 December 2025, the relevant Principal Professional Officer confirmed that according to the City's Water and Sanitation Department's record, no water and sanitation infrastructure exist under the lagoon bed. The mains crossing the river are located along the bridge superstructure and will not be affected.</p>
		<p><u>Conclusion</u></p>	
	1.1	<p>It is noted that Annexure B1 of the DBAR, with Site Plans, is not included in the documentation, although it is referred to in the document.</p>	<p>Although page 49 of the draft BAR did indicate that the “preferred Site Development Plan (SDP) illustrating the preferred dredging alternative is included in Appendix B1”, the Appendix list provided on pages 23-25 of the Draft BAR indicated that the preferred SDP is in Figures 2 and 3 of the report itself. The reference to Appendix B1 on page 49 of the final</p>

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			BAR has been updated to refer instead to the relevant figures.
	1.2	The potential impacts of the proposed dredging works on existing municipal water and sewer infrastructure must be clearly described and outlined how these assets will be protected during the dredging.	The project engineers through engagement with the City's Water and Sanitation Department's Principal Professional Officer confirmed that the City's reticulation infrastructure is not affected by the proposed dredging.
	1.3	It is recommended that a plan be included in the final Basic Assessment Report (BAR) and Environmental Management Programme (EMPr) that illustrates the location of the existing water and sewer infrastructure in relation to the proposed dredging.	The proposed dredging will not affect the existing water and sewer infrastructure. The City's Water and Sanitation Department have confirmed that the reticulation infrastructure is not located below the lagoon bed and thus there is no need to include a plan within the Final BAR and EMPr to illustrate the location of the existing infrastructure. Instead, this Department is referred to the response of the Principal Professional Officer as provided under Appendix 4 below.
	1.4	The project engineers must confirm the exact location and depth of the existing water and sewer mains. Engagement with the Regional Reticulation Official (Mark Brodovcky – Mark.Brodovcky@capetown.gov.za) is required in this regard.	The project engineers have engaged with the Regional Reticulation Official (Mark Brodovcky –

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	1.5	The project team must submit engineering drawings for approval to the Regional Reticulation Official, Mark Brodovcky (email: Mark.Brodovcky@capetown.gov.za) prior to commencement of works.	Mark.Brodovcky@capetown.gov.za) as required regarding the exact location and depth of the existing water and sewer mains, and will provide the relevant official with the draft engineering drawings (plans) for approval prior to commencement as directed by the Regional Reticulation Official – see Appendix 4 to this PPPr.
	2.	Energy Directorate: Electricity Department	
	2.1	The Electricity Department provided the following comment: The electrical infrastructure in the vicinity of the proposed dredging is illustrated in Annexure C.	The Applicant takes note of the electrical infrastructure in the vicinity to the proposed dredging site.
	2.2	No comments or deviations to electricity services necessary as a consequence of no electrical infrastructure existing in the dredging area. The Electrical Department would, however, at every project instance for future use insist that civil projects affected by electrical infrastructure must submit wayleaves and engage the Electricity Department to verify the infrastructure.	The Electricity Department's confirmation that no electrical infrastructure exists in the dredging area is acknowledged and thus there is no need for submission of any wayleave or requirement to engage the Department to verify the proposal.
	2.3	Once infrastructure exists in the vicinity of the dredging, civil works must comply with electrical requirements.	Civil works for the proposed dredging will comply with the electrical requirements, as relevant.
	3.	Community Service & Health Directorate: Specialist Environmental Health – Environmental Health Section	

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	3.1	<p>The Environmental Health Section provided the following comment:</p> <p>Preventative measures must be put in place to mitigate any health nuisances or health related issues that might affect the health & wellbeing of the residence and surroundings.</p>	<p>Nuisances with regards to dust generation, risk of spills, and noise have been accounted for within the EMPr for implementation to effectively mitigate for any health-related nuisances and/or issues – see Section 5.12 of the EMPr (Appendix H of the final BAR).</p>
	4.	Community Service & Health Directorate: Specialised Environmental Health – Air Quality Management Unit	
		<p>The Air Quality Management Unit (AQM) provided the following comment:</p> <p>The AQM Unit notes that the intervention has the potential to contribute to improved environmental conditions, including reductions in hydrogen sulphide (H₂S) odour that influence ambient air quality in the surrounding area. The AQM Unit raised the following considerations:</p>	<p>The considerations raised by the Air Quality Management Unit (AQM) are hereby noted.</p>
	4.1	<p>Ambient H₂S levels in this area are measured continuously at the Woodbridge Island ambient air quality monitoring station operated by the City of Cape Town's Scientific Services. During the dredging phase, Scientific Services must monitor this station's H₂S data closely, with active comparison to the World Health Organisation (WHO) guideline values and any relevant health-protective thresholds. Any sustained exceedances must be communicated timeously to the AQM Unit, the Environmental Control Officer, Water and Sanitation, the contractor and the Milnerton Stakeholders forum, in order for appropriate corrective measures to be implemented.</p>	<p>The need for the City of Cape Town's Scientific Services to monitor the air quality monitoring station's H₂S data closely during the dredging phase is noted. The City's Air Quality Management Unit was contacted via email to confirm the contact details of the City's Scientific Services for the Applicant's reference – see Appendix 5.</p> <p>The proposed dredging project is not expected to result in excessive H₂S production, and the release of</p>

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			<p>any H₂S is expected to be temporary, restricted to the implementation phase. The EMPr and the MMP (considering maintenance activities) have been updated to include that any sustained exceedances noted by the City of Cape Town's Scientific Services as a likely consequence of the dredging activity, should be communicated to the ECO, Water and Sanitation, the contractor and the Milnerton Stakeholders forum, in order for appropriate corrective measures to be implemented. Refer to section 4.3 and 5.11 of the EMPr which addresses odour management (Appendix H of the final BAR).</p>
	4.2	<p>The DBAR identifies temporary odour emissions from sediment disturbance as the primary air quality concern. The Socio-Economic Impact Assessment rates odour impacts as Low for Preferred Alternative 1 and Medium for Alternative 5. In this regard, the AQM Unit reserves the right to request a project-specific Odour Management Plan (OMP) outlining monitoring responsibilities, response actions, intervention thresholds, complaint-handling procedures, and adaptive measures should odour impacts significantly intensify and complaints be received from affected parties. The AQM Unit accordingly supports the recommendation that alternative 1 be selected as the preferred alternative for the project, with the proviso that the EAP's assessment of the odour impacts based on the different options is indeed correct. It is the view</p>	<p>It must be noted at this stage, that temporary odour emissions from sediment disturbance during dredging are the primary odour concern related specifically to this application. As noted in the comment, the residents of the Woodbridge Island already experience and perceive the odour levels within their homes to be excessive and infringing on their</p>

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		<p>of the AQM Unit that some preliminary investigation into the impacts of the alternatives should take place prior to commencement of the project, as placing dredged material along the Western Bank of the river, in very close proximity to the Woodbridge Island residents is a concern as complaints have already been received by these waterside residents that their perceived H₂S exposure is higher than that recorded at the City of Cape Town's Woodbridge Island monitoring station.</p>	<p>well-being – unrelated to the dredging.</p> <p>The smell around the lower lagoon was historically (until 2023) associated with the accumulated sediment at the time that the in-depth remediation assessments were undertaken (i.e., 2023 Remediation Plan; Rose et al., 2023). The reason for this was due to the H₂S released as a result of the decomposition of organic material, typical of bacteria in anoxic conditions. However, the subsequent flood events of the years 2023 and 2024 resulted in natural scouring, which flushed out an estimated 110 000 m³ of fine organic sediment, reopening the lagoon mouth and exposing the bed to oxygen and sunlight at low tide.</p> <p>This resulted in improved flushing of the lower lagoon, although the benefits of sediment scour between 2023/2024 were not observed in 2024/2025 due to increases in pollutant loading from the</p>

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			<p>catchment of raw and partially treated effluent.</p> <p>The EAP therefore notes that the main reason for odour release within the lower lagoon is the water quality itself flowing within the lower lagoon and is not primarily caused by the sediment. Consequently, any temporary odour released from the disturbance of sediment by the placement of dredged material on the banks of the lagoon is anticipated to be minor in relation to the existing smell due to the intermittent presence of raw or insufficiently treated wastewater within the lower lagoon.</p> <p>As a result of the concerns raised by I&APs regarding the perceived security implications of the placement of sediment on the western bank of the lagoon, the proposal has been slightly amended to exclude the placement of dredged material along the western bank immediately downstream of the Loxton Road bridge. Although the proposed dredging is not directly intended to improve the smell</p>

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			<p>experienced near the lower lagoon, but rather improve the hydrodynamic function of the lower lagoon, this should in turn assist with the ecological functions such as increased saline intrusion within the lagoon and sun exposure to sediment on the sandbanks, which should indirectly improve the conditions of the lower lagoon such that an improvement in odour could occur.</p> <p>An Odour Management Plan (OMP) can be provided at a later stage should the AQM Unit request it.</p>
	4.3	Ongoing coordination between the contractor, the Environmental Control Officer, the City of Cape Town Air Quality Management Unit, Scientific Services, and the City of Cape Town's Water and Sanitation Department and Community Stakeholders is strongly encouraged. Effective communication between these parties will be essential for consistent monitoring, timely reporting, and sustained compliance with all air-quality-related requirements throughout the dredging period.	The EMPr includes the requirement for open- communication between the ECO, the City of Cape Town AQM Unit, Scientific Services, and the City of Cape Town's Water and Sanitation Department and Community Stakeholders as recommended.
	4.4	The Head: Specialised Environmental Health Services /City's Air Quality Officer reserves the right to in terms of the legislation governing air quality management, to require additional actions deemed necessary.	The right of the AQM Unit to reserve the right to require additional actions from the Applicant as necessary is acknowledged.

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	4.5	Should there be any further queries, please feel free to contact Mr Thato Liphoto at (021) 444 6423 or e-mail Thato.Liphoto@capetown.gov.za for more information and assistance.	Mr Thato Liphoto's contact details are noted should the Applicant have any further queries.
	5.	Community Service & Health Directorate: Recreation & Parks Department – Coastal Coordination	
		The Coastal Coordination Branch provided the following comment:	
	5.1	<p>The expected improved water flow through the lagoon mouth, as a result of the dredging, implies that the subsequent stronger current and its flow will cause a heightened drowning risk. This risk is not unique to the mouth of the Milnerton Lagoon, as all river mouths and estuary mouths hold an inherent risk due to the possible formation of rip currents or other such dangerous currents.</p> <p>At present bathing in Milnerton lagoon is prohibited due to the health risk associated with the water quality, but once the bathing conditions improve, so does the potential for drowning. As Drowning Prevention is a core activity of the City of Cape Town's Recreation and Parks Department, cognisance will have to be taken of these risks. In this regard, it is recommended that during and after the dredging operation the necessary public awareness and internal communications are timeously and adequately communicated to all Interested and Affected Parties (I&AP's), including the public at large. It is noted that the Milnerton Lifesaving Club does operate in the vicinity, but the nature and degree of their operation and the nature of the Recreation and Parks Department's drowning prevention operations would need to adapt accordingly.</p>	<p>The Milnerton Lagoon and its mouth are currently closed to recreational use and signage exists in this regard.</p> <p>The EMPr has been updated (see Section 4.1.3. of the final EMPr attached as Appendix H of the final BAR) to include reference to the need for explicit and appropriate communication with I&APs of the timing of the proposed dredging event so as to ensure the public is generally aware of the dredging activity timing.</p>
	5.2	If drones are intended to be used to either monitor the dredging or photograph operations etc. the necessary permission needs to be applied for, according to the correct channels. The primary concern with the use of drones is the proximity of the operation to a protected natural area, the Table Bay Nature Reserve, and particularly the numerous bird species that inhabit and/or frequent the area.	The Applicant is aware of the need to obtain the necessary permissions to operate drones for any purpose related to the proposed dredging.

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	6.	Spatial Planning and Environment Directorate: Development Management Department	
	6.1	The Development Management Department has confirmed the proposed dredging does not trigger the need for a land use application.	It is noted that the Development Management Department confirms that no land use application is required for the proposed dredging activity.
	7.	Spatial Planning and Environmental Directorate: Urban Planning and Design Branch	
	7.1	<p>The Urban Planning and Design Branch provided the following comment:</p> <p>The proposed dredging of lower Milnerton Lagoon does not trigger the Urban Design Policy (2024) and therefore has no significant urban design impact.</p>	The Urban Planning and Design Branch's confirmation that the proposed dredging does not trigger the Urban Design Policy (2024) with no significant impact on urban design impact, is noted.
	8.	Spatial Planning and Environmental Directorate: Environmental Management Department – Environmental and Heritage Management Branch	
	8.1	<p>The Environmental and Heritage Management Branch provides the following comment:</p> <p>8.1 The contact details in Section A of the Draft BAR and Section A of the Maintenance Management Plan need to be updated to include the following additional details:</p> <p>8.1.1 The contact details for Dalton Gibbs: Regional Head: Biodiversity Management Branch Northern Region; Tel: 021 444 7792.</p> <p>8.1.2 The contact details for Sonja Warnich Stemmet must include the Branch details: Environmental and Heritage Management Branch and include the correct contact number: 021 444 0598.</p>	The contact details for the Environmental and Heritage Management Branch as provided alongside have been updated in Section A of the final BAR. There is no Section A within the Maintenance Management Plan (MMP) to update.

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	8.2	Section B Item 4.5. Access of the Draft BAR needs to include a plan to illustrate the 4 site access alternatives.	The four access alternatives have been indicated with coordinate points provided under Section 4.5 of the final BAR and presented in order of preference. The access will likely constitute a temporary ramp, slipway, or use of sandbags, but the detail regarding the infrastructure for access to the site will depend on the access alternative chosen and the final specifications of construction timing and other factors. The potential infrastructure has been described for each access alternative under Section 4.5 of the final BAR. The appointed contractor will be expected to propose the most appropriate access method for approval by the applicant and the ECO. The infrastructure constraints as per the proposed options have been considered with regards to the listed activity triggers under the Section D of the BAR.
	8.3	Section E1: Description of preferred alternative of the Draft BAR refers. More detail must be provided in the project description, i.e. the depth, width and amount of material to be dredged, the details of the berm north of the wooden bridge, the extent of sandbags to facilitate access, access alternatives etc.	Section E1 of the final BAR has been updated to include additional detail as requested.

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	8.4	It is noted that implementation of the proposed dredging is to be delayed until water quality in the lagoon reaches acceptable levels in terms of dissolved oxygen. In this regard it is recommended that the validity of the Environmental Authorisation, if issued, be extended to factor in potential delays in implementation.	The EAP recommends that the implementation of proposed dredging (as considered in this application) be delayed until water quality inflows into the lagoon reach acceptable levels.
	8.5	Section F: Public Participation of the Draft BAR refers. It is noted that the Public Participation documentation has not been included in the Draft BAR and that it is intended for this information to be included in the Final BAR.	This is correct. Refer to this Public Participation Report for proof of public participation conducted on the project.
	8.6	No impacts to heritage resources are anticipated by the proposed dredging nor are there any heritage legislative triggers.	Correct.
	8.7	The impact assessment and EMPr must address potential impacts on the existing municipal services that may be affected by the dredging activities, such as the stormwater outlets, the sewer and water infrastructure and the electricity infrastructure.	No municipal services or reticulation infrastructure will be affected by the proposed dredging.
	8.8	Annexure B10 of the Draft BAR refers. The detail design/engineering drawings must be included in Annexure B1 for each alternative considered. No plans have been included in Annexure B1.	No detailed design/engineering drawings are available at this stage.
	9.	Spatial Planning an Environmental Directorate: Environmental Management Department – Coastal Management Branch	
	9.1	The Coastal Management Branch (CMB) provided the following comment: Timing: The CMB is in principle supportive of the dredging of the lagoon, provided that, and as indicated in the DBAR, dredging coincides with improvements in water quality entering upstream as per the parameters set in respect of Dissolved Oxygen measurements. Importantly, this intervention must also	The EAP concurs that the implementation should be aligned with an improvement in inflowing water quality as stipulated in the BAR. The additional request that the dredging coincide with a reduction

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		<p>coincide with a significant reduction in unplanned discharges and spills into the system i.e. failures at the Koeberg pumpstation. This requirement is based on the following statements on page 3 and page 5 of the DBAR:</p> <ul style="list-style-type: none"> - <i>“Sewage-derived pollution is a major contributor to water quality impacts in the estuary and includes excessive loading of organic solids from the Potsdam wastewater treatment works (WWTW)”</i>. - <i>“Further, “During 2024 and 2025, the lagoon has also been affected by the discharge of large volumes of untreated sewage because of the episodic failure of the Koeberg Road sewerage pump station and its resulting discharges into the Theo Marais stormwater canal upstream of Otto du Plessis Drive)”</i>. - <i>“A Water Quality Remediation Plan for the Milnerton Lagoon was prepared for the City of Cape Town in 2023 (Rose et al., 2023), “the 2023 Remediation Plan”, which assesses various short-, medium- and long-term remediation measures proposed for the lagoon and recommended that the primary focus of remediation of the pollution within the lagoon should be on reducing the sources of pollution into the estuary”</i>. 	<p>in unplanned discharges and spills, i.e. failures at the Koeberg pumpstation, is consistent with this requirement. Capacity upgrades are scheduled for Koeberg Road Pump Station in 2027 in response to episodic failure of this station which will reduce sewage discharging into the lagoon. A reduction in unplanned spills would improve water quality and associated dissolved oxygen concentrations. Under these conditions, dredging is recommended.</p>
	9.2	<p>Cost-benefit and channel maintenance:</p> <p>The following statements on page 4 and page 5 of the DBAR have reference:</p> <ul style="list-style-type: none"> • <i>“The Diep River Estuarine Management Plan (adopted in 2022) includes a set of objectives and actions, of which Objective H1 and Action I12 involve the following, “Assess the possible cost and benefit of dredging the lower lagoon to facilitate the release of sediments and nutrient loads and emulate natural scour and enable ingress of increased volumes of seawater into the system.... Implement dredging if a significant benefit is anticipated (refer to pg 9 of EMP, 2022)”</i>. 	<p>The concern about the cost benefit associated with keeping the channel open is acknowledged, and it is agreed that the dynamic nature of the estuary mouth makes it difficult to routinely manage this section of the estuary. Section 4.2.2. of the MMP speaks to the ‘Timing of maintenance works’. The frequency of mouth management and maintenance of the depth of the</p>

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		<ul style="list-style-type: none"> “During the post-dredging phase of the project, periodic maintenance of the channel and open mouth conditions may be required to preserve the hydrodynamic function of the lower lagoon. Any such maintenance to restore the hydrodynamic function of the channel and an open estuary mouth is to be conducted strictly in accordance with the EMP (refer to Appendix H2), and only when necessary to sustain hydrodynamic functioning of the lower lagoon”. 	<p>scoured channel have specifically been left undefined and rather indicated as proposed for implementation only if sand or sediment accumulates within the lower lagoon and near the mouth to the extent that it restricts tidal flushing and is deemed by the City's Coastal Management and Biodiversity Management Branches to be unlikely to be reopen without intervention.</p>
		<p>A key consideration of the cost benefit analysis is to understand maintenance frequency of keeping the channel open. Whilst a dredged channel may increase velocity, estuarine environments are complex systems in terms of sediment movement and transfer. This is especially the case in the beach berm area (red zone as reflected in Figure 1 below) which is influenced more by wider coastal processes i.e. longshore sediment drift, wave action etc. A concern is that whilst the channel within the river (upstream of the estuary mouth) may be maintainable in frequencies that show a “cost benefit” in the positive, keeping the channel open in the dynamic zone of the beach berm may require more frequent re-opening, thereby showing a ‘cost benefit’ in the negative. This comment is based on the CMBs own experience of attempting to open the mouth, yet it closes within days due to dynamic processes at play.</p>	
		<p>The abovementioned City of Cape Town comment must kindly be addressed and included in the final Basic Assessment Report and EMPr and a response provided to the comments. The final Basic Assessment Report and EMPr must kindly be circulated to the City of Cape Town for information.</p>	
<p>Ryan Peter – Department of Forestry, Fisheries and the Environment – 12 December 2025</p>			

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A5		<p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DREDGING OF THE MILNERTON LAGOON IN THE DIEP RIVER ESTUARY, CAPE TOWN.</p> <p>The Department of Forestry, Fisheries, and the Environment (DFFE), Branch Oceans & Coasts (O&C) appreciates the opportunity granted to comment on the Draft Basic Assessment Report (BAR) for the Proposed Dredging of the Milnerton Lagoon in the Diep River Estuary, Cape Town. This Branch 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").</p> <p>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.</p>	<p>The comments from O&C are acknowledged and have been responded to below. The mandate of the O&C is noted.</p>
		<p>Guided by the principles of integrated coastal management, this Branch 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.</p> <p>Based on the submitted Draft BAR, the Branch presents the comments stipulated below for consideration. Please note the recommendations for your consideration:</p>	<p>The principles underpinning the O&C comments are acknowledged and understood.</p>
	1.	<p>The Estuarine Management Plan for Diep River should be approved by the Member of the Executive Council, not the Municipal Executive Council.</p>	<p>The Estuarine Management Plan was indeed approved by the Member of the Executive Council (Min Anton Bredell) in 2022. This has</p>

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			<p>been corrected in the final Bar on page 38.</p>
	2.	<p>The preferred option involves dredging approximately 30,000 m³ of sediment from the channel and placing it along the sides of the dredged area to build up sandbanks within the tidal zone. The creation of sandbanks has the potential to alter the existing estuarine morphology; therefore, all depositions should follow the natural sandbank profile to avoid unintended geomorphological impacts.</p>	<p>The preferred alternative is confirmed to be the dredging of approximately 30 000 m³ of sediment from the lower lagoon to create a channel and the dredged material will be placed alongside this channel to form sand banks.</p> <p>The intention of the dredging of the lower lagoon is precisely to alter the morphology of this section of the lagoon to improve the hydrodynamic function of the estuary mouth. The benefits associated with this include the intrusion of oxygenated seawater and improved flushing capacity of lagoon water out to sea.</p> <p>The proposed new profile was determined in the Estuarine Impact Assessment and Hydrodynamic Modelling Report (Appendix G1 of the final BAR), which shows the modelled placement of dredged material adjacent to the existing</p>

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			sand banks such that the new banks will either be at the same depth or deeper than the existing banks (refer to Figure 4-7 of the Estuarine Impact Assessment Report), to achieve the anticipated hydrodynamic benefits.
	3.	It is further recommended that the proponent clarify whether this option has adequately considered local wind patterns, including the rate at which the deposited material is expected to dry and the associated risks of erosion or unwanted sand accretion.	The material is proposed to be deposited in such a manner as to be located in the intertidal zone, and will be wetted and dried during tidal cycles. This is therefore not anticipated to result in significant erosion or accretion.
	4.	The Branch appreciates the efforts made by the Municipality to improve the water quality and hydrodynamics of the lagoon, particularly the interventions addressing the primary sources of contamination associated with the wastewater treatment works.	The Branch's appreciation for the Municipality's efforts is noted.
	5.	During the ongoing maintenance, the applicant should consider monitoring any morphological changes that can impact the existing structures around the lower reaches of the estuary.	Maintenance activities are expected to be restricted to the mouth of the estuary and the section of the lagoon dredged in this project. Maintenance therefore should not impact on any existing structures around the lower reaches of the estuary, and this will be monitored by the applicant. Refer to the Maintenance Management

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			Plan (Appendix H2 of the final BAR) for more details.
	6.	The applicant is reminded of the 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 authorized by law or cannot reasonably be avoided or stopped, to minimize 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.	The applicant is aware of the Duty of Care in terms of Section 28(1) of NEMA as well as Section 58 of the NEM:ICMA.
	7.	The ICM Act advocates for reasonable coastal access to the coastal and estuarine resources. Therefore, the applicant must take note of the provisions of Section 13 of the ICM Act which states that "(1) Subject to this Act and any other applicable legislation, any natural person in the Republic – (a) has a right of reasonable access to the coastal public property; and (b) is entitled to use and enjoy coastal public property, provided such use – (i) does not adversely affect the rights of members of the public to use and enjoy the coastal public property; (ii) does not hinder the State in the performance of its duty to protect the environment; and (iii) does not cause adverse effect. (1A) Subject to subsections (2) and (3), no person may prevent access to coastal public property.'" During the construction and operational phase, the applicant should demarcate the designated access points to the beach and ensure that the public can safely use and enjoy the coastal zone.	<p>The provisions of Section 13 of the ICM Act are noted, including the requirement for reasonable coastal access to the coastal and estuarine resources.</p> <p>The EMPr includes the need for clear demarcation of any no-go areas to protect sensitive habitat, and has been amended to include the need for clear demarcation of designated access points to the beach during the construction and operational phase of the project (page 35 of the EMPr and page 27 of the MMP – Appendix H of the final BAR).</p>

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	8.	<p>Section 63 of the ICM Act states that when environmental authorization for coastal activities is applied or in terms of Chapter 5 of the National Environmental Management Act, the competent authority must take into account all relevant factors, including whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas, the socio-economic impact of the proposed activities and the likely effects of coastal processes on the developmental proposal.</p>	<p>The requirements of Section 63 of the ICM Act are acknowledged, and the BAR addresses the relevant factors listed, including whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed activity is consistent with the purpose for establishing and protecting those areas, the socio-economic impact of the proposed activities and the likely effects of coastal processes on the project proposal.</p> <p>The proposed project area is also considered part of the Coastal Protection Zone (CPZ) in terms of NEM:ICMA and also lies within the coastal public property (CPP). The proposed dredging activity aligns with these zones as it is intended to improve the hydrodynamic functioning of the mouth of the estuary, by facilitating improved flow and tidal flushing. Additionally, dredging is anticipated to improve the ecological integrity of the lagoon by preventing the</p>

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			<p>accumulation of organic sediment via increasing tidal exchange.</p> <p>The socio-economic aspects are discussed in Section G.8 of the BAR.</p>
	9.	The applicant is reminded that no person may discharge effluent that originates from a source on land into coastal waters and or dump any waste or other material at sea without authorization from the Minister.	The applicant is aware that no person may discharge effluent that originates from a source on land into coastal waters and or dump any waste or other material at sea without authorization from the Minister. The preferred alternative will not result in the discharge of discharge effluent that originates from a source on land into coastal waters and or dump any waste or other material at sea. The Department has previously confirmed that the proposed dredging would not constitute a coastal discharge.
	10.	It is unclear whether a contingency plan for spillages and/or leakages has been developed. Should such a plan not yet exist, it is recommended that a comprehensive contingency plan be prepared for the operational phase. All hazardous substances must be handled in accordance with the applicable legislation governing their transport, storage, and use. Potential pollution sources must be managed to ensure that groundwater and coastal waters contamination is minimized as far as reasonably practicable.	The risk of spills is included in the EMPr (Appendix H1 of the BAR), and includes management actions such as "5.12.3 Refuelling of dredge machinery should take place under controlled conditions and outside of periods when wind or water action make refuelling difficult or likely to

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			result in spillage. Record the occurrence of any spillages." Page 42 of the EMPr also states that the appointed Contractor shall compile a Method Statement for the refuelling of all watercraft and plant equipment under normal and emergency situations (i.e., a Spill Contingency Plan).
	11.	You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no other additional activities outside the scope of this application may commence before an Environmental Authorization is granted by the Department.	The requirement for an Environmental Authorization granted by the department prior to commencement of other additional activities outside the scope of this application is acknowledged.
		Kindly note that the Branch Oceans & Coasts 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 and an electronic copy) should be submitted to our office via email to 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 right of the Branch to revise its comments and request further information is acknowledged.
Nelisa Ndobeni – Department of Water and Sanitation, Western Cape – 22 December 2025			
A6		Dear Sir/Madam DRAFT BASIC ASSESSMENT REPORT: PROPOSED DREDGING OF THE MILNERTON LAGOON IN THE DIEP RIVER ESTUARY, CAPE TOWN.	The comments from the Department of Water and Sanitation are acknowledged and responded to below.

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		<p>Reference is made to the above mentioned document dated November 2025 with DEA&DP Reference Number: (16/3/3/1/A1/18/3048/25).</p> <p>This Department has perused the submitted application and has the following comments:</p>	
	1.	The comments received from this Department dated 09/09/2025 for the proposed activity are still applicable and valid.	The applicability of the comments submitted in response to the consultation held with the Department on 18 August 2025 to discuss whether the proposed dredging would have any applicable water uses is noted. This comment has been included below for reference.
	2.	The comments issued shall not be construed as exempting the applicant from compliance with the provisions of any other applicable Act, Ordinance, Regulation or By-law.	The comments received from the Department of Water and Sanitation are not construed as exempting the applicant from compliance with the provisions of any other applicable Act, Ordinance, Regulation or By-law.
	3.	All the requirements of the National Water Act, 1998 (Act 36 of 1998) regarding water use and pollution prevention must be adhered to at all times.	The requirements of the National Water Act 1998 (Act 36 of 1998) regarding water use and pollution prevention are acknowledged and will be adhered to.
	4.	Please note that this Department reserves the right to amend and/or add to the comments made above in the light of subsequent information received	The right of the Department to amend and/or add to the comments made is acknowledged.

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		Please do not hesitate to contact the above office should there be any queries.	

Warren Dreyer – Department of Water and Sanitation – 09 September 2025

A7		<p>WATER USE QUERY REGARDING THE PROPOSED CCT MILNERTON LAGOON DREDGING: WATER USES</p> <ol style="list-style-type: none"> 1. Your water use enquiry regarding the abovementioned application dated 18/08/2025 refers. 2. The Department has perused the information provided for the proposed development and can confirm the water uses in terms of Section 21 (c) impeding or diverting the flow of water in a watercourse and Section 21 (i) altering the bed, banks, course or characteristics of a watercourse are not triggered. 3. Further, the groundwater abstraction from the beach wells will also not trigger a water use and therefore not require authorisation, provided it does not intercept the freshwater aquifer and only draws sea water. 4. The City of Cape Town Municipality is required to submit detailed method statements indicating how the work will be undertaken. This should include the a map detailing the site camp, roads, pipeline routes and discharge and abstraction points. 5. If there is an estuary management plan for Milnerton Lagoon, a copy must be included with the method statement. 6. A detail report showing the flow dynamics and the freshwater sea water interface for the estuary. <p>Should you have any questions please do not hesitate to contact this office.</p>	<p>[submitted in response to the consultation meeting held with the department on 18 August 2025]</p> <p>Confirmation that the proposed dredging does not constitute a water use is noted.</p> <p>Detailed methods statements will be compiled pre-construction including all relevant details pertaining to the proposed dredging project, and the Estuary Management Plan will be included with these.</p>
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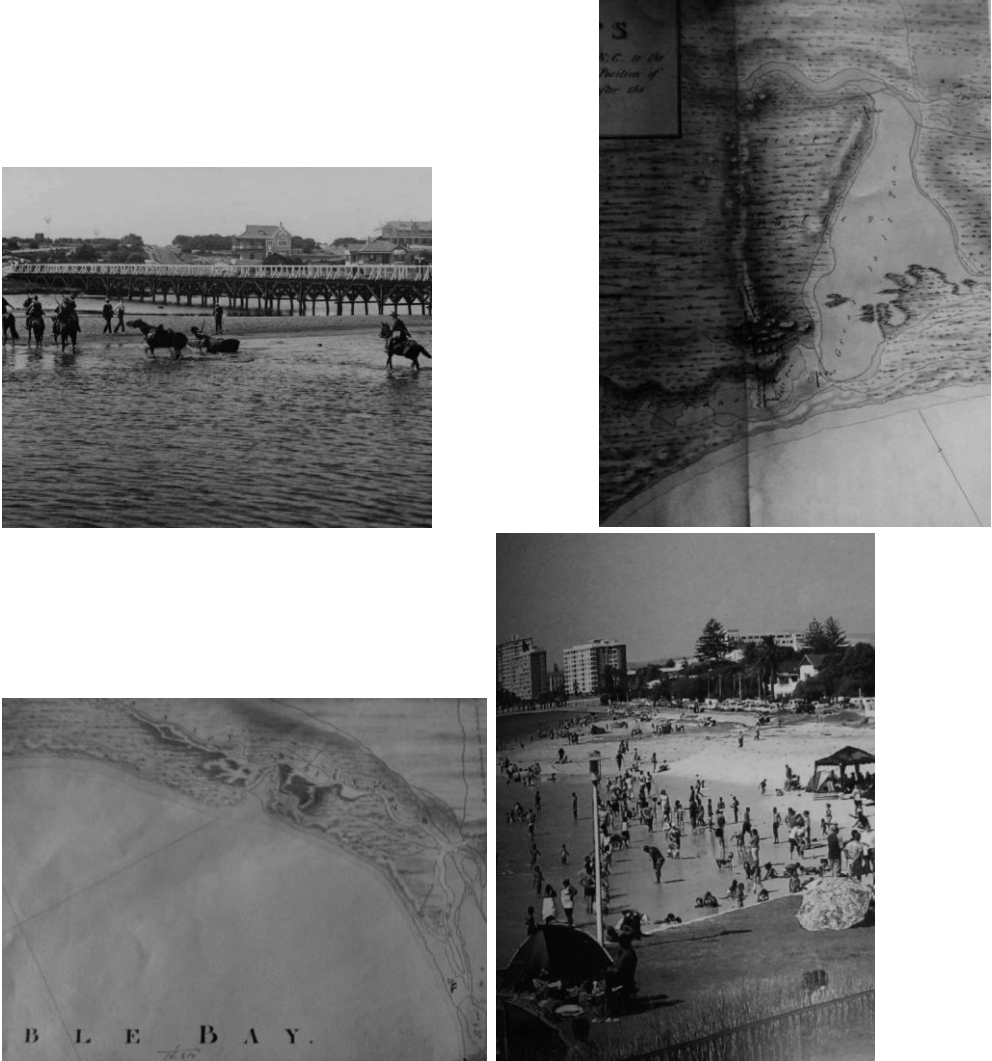
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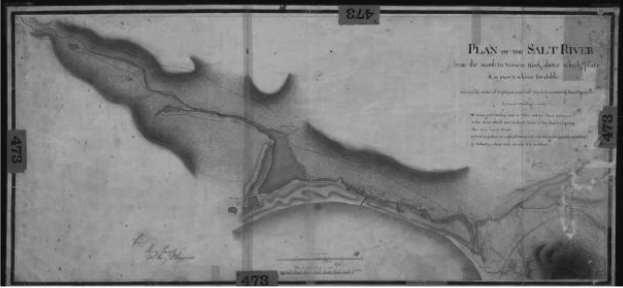
I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
I&AP: Michaela Gabriel, Private – 06 November 2025			
P1		Yes, to dredging but obviously only once all major sources of pollution to the Diep River have been identified and eliminated. Dredging a river while sending raw sewage through its banks makes 0 sense and just burns rate payers money.	The BAR also recommends that the implementation of the proposed dredging be delayed until water quality inflows into the lagoon reach acceptable levels. This recommendation aligns with the comment raised.
I&AP: Gordon Harding, Private – 06 November 2025			
P2		<p>(WhatsApp – sent on 17 November 2025)</p> <p>From what I've seen, the BAR doesn't appear to include microbial or nutrient flux testing (for example, ammonia, phosphorus or hydrocarbons). Given the history of sewage contamination in the system, disturbing lagoon sediments could result in a significant re-release of bacteria and nutrients.</p>	<p>(Email Response sent on 17 November 2025)</p> <p>Thank you for your comments submitted on the Draft Basic Assessment Report for the Proposed Dredging of the Milnerton Lagoon project. Responses to your comments are provided in the blue text below.</p> <p>You are also hereby reminded of the upcoming Public Open House, which will take place on Wednesday, 19 November 2025 at the Italian Club of Cape Town. You are welcome to attend at any time between 16h00 and 19h00 to learn more about the application and/or provide further input.</p>



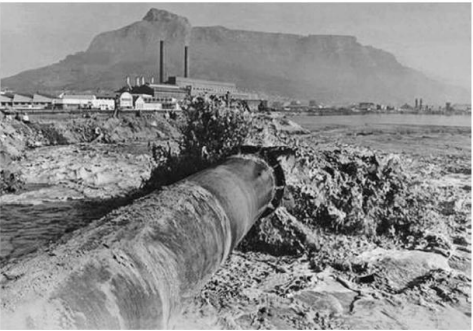
I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>Could you please clarify:</p> <ol style="list-style-type: none"> 1. Whether any microbial or nutrient flux analyses (e.g. NH_4^+, PO_4^{3-}, sulfide/sulphate ratios) were conducted, or if these are planned before dredging begins? 2. Has there been any assessment of pathogen survival or reactivation potential in the sediments, considering the chronic sewage inputs? 3. Are there any additional remediation or mitigation measures planned beyond dredging itself? Like the use of aeration systems, floating wetlands or other oxygenation or nutrient management methods? 	<p>Microbial and nutrient flux analyses were not conducted for this assessment, as they were not deemed necessary by the estuarine specialist. We do have data confirming excessive NH_4^+ and PO_4^{3-} loading in the inflowing water - while dredging will certainly resuspend nutrient-enriched sediment, in the current context it's unlikely to make very much difference to the concentrations. As noted in the reports, we do expect that disturbing the sediments may cause release of hydrogen sulphide and methane during dredging, but this should be temporary.</p> <p>Similarly to the above, the pathogen loading in the inflowing river is excessive at present. The intention of increasing the tidal exchange is partly to increase salinities, which would have the effect of reducing survival for at least some of the more problematic organisms.</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>Will there be adaptive water quality monitoring (for parameters like DO, E. coli, and nutrients) during and after dredging and will the results be made available to the public?</p>	<p>Several additional and alternative remediation measures were assessed as part of the 2023 Water Quality Remediation Plan. These included:</p> <ul style="list-style-type: none"> • Aeration systems (trialled between November 2023 and May 2024) - but the impacts of the trial on the dissolved oxygen concentrations in the lower lagoon were insignificant against the drawdown and demand of the organic sediment in the lagoon due to excessive upstream loading of polluted water. • Saltwater addition, which is being investigated at present under a separate application. • Biofiltration and constructed wetlands, which were assessed but not deemed feasible at the required scale. • The primary focus should be - and is - the improvement of water quality in the Diep River, including through the Potsdam WWTW upgrade and the various other projects described in the BAR.

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			<p>Yes, ongoing water quality monitoring of DO and other physicochemical parameters is proposed before, during, and after the dredging process in addition to the City's routine monitoring of nutrients, faecal indicator bacteria, and other parameters. Registered Interested and Affected Parties will be notified prior to commencement of the proposed dredging.</p> <p>Although we have not yet formalised communication procedures for the implementation phase, data can be made available by the City or ECO during implementation.</p>
I&AP: Matt Wiese, Private – 10 November 2025			
P3		<p>I won't be able to input on Wednesday 19 November 2025 at the Italian Club. My advise is to do your research properly before more damage is done. Currently there is a huge amount of Sewerage being discharged again. Best to warn all Ocean Beach loving people not to go near Milnerton for and after the dredging. The currents are not favourable this time of year. Also it might be a</p> <p>good idea to close the River Mouth during dredging or open another channel further up the Diep River or fit a pipe to discharge far away from any public or residential area. History just repeats itself. See attached. Take care!</p>	<p>(Email response sent on: 02 December 2025)</p> <p>We're sorry you weren't able to attend the Open Day, but appreciate your inputs here.</p> <p>Previous studies have assessed the suggestion you make for a marine outfall, but determined that the water quality would be far worse in a closed-mouth situation than even</p>

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			<p>at present, due to the benefits of daily tidal cycles. I'd encourage you to read through some of the extensive work including the estuarine specialist reporting and the Basic Assessment, available on the website, and to reach out if you have any further comments or queries.</p>

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I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		  	
I&AP: Carlo and Hannah Botes, Homeowner - Woodbridge Island – 20, 21 & 28 November 2025 as well as 05 December 2025			
P4		<p><i>(Registration Form – submitted on 20 November 2025)</i></p> <p>I attended the info session that was held yesterday (19/11) at the Italian Club in Rugby and was helped by a gentleman from your organisation, Jeremy - if my memory serves me correctly.</p>	<p><i>(Email response sent on: 02 December 2025)</i></p> <p>Thank you for your comments on the Milnerton Lagoon Dredging project, and for your attendance at the Open Day.</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>I would appreciate clarification on how the proposal will impact the visual aspect of the lagoon. I went through the documents on the web site - quite a lot and I could have missed something, but I did not see any that helps one form a visual understanding. (I saw the diagram on page 32 of the main report.)</p> <p>To help me I need the following please:</p> <p>1) Attached is a screen copy of the photo/diagram on the proposed sand banks to be created with the dumping of the sludge.</p> <p>QUESTION:</p> <p>2) What is the impact on the area bounded by my yellow line and your polygon on the western side of the lagoon.</p> <p>Mockup: Can visual mockups be provided of the appearance of the lagoon after the creation of the sandbanks at low tide for someone standing:</p> <p>a) on the motor bridge</p> <p>b) at the edge of the lagoon at the centre of the grass on the eastern side</p> <p>c) at the edge of the lagoon in front of a housing unit on the western side</p> <p>The mockups should obviously be accurate in terms of the planned width of the sandbanks and the channel as per the modelling that was done.</p> <p>(Email sent on Friday, 21 November 2025)</p> <p>The registration to which I received the email below, was initiated to request information rather than to just comment.</p>	<p>We unfortunately do not have mock-ups available, but can advise as follows -</p> <ul style="list-style-type: none"> • At high tide, the proposed sandbanks and channel would be entirely covered and not visible. • At low tide, sandbanks would be visible, similar to those already found near the mouth of the lagoon and upstream of the wooden bridge during low tides. See images of the lagoon's sand bank exposure at low tide via the following OneDrive shared folder: <p><i>MilnertonLagoon-Lowtide profile images</i></p> <p>Are there specific visual impact concerns that you would like responded to?</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>Please see the comments logged by me in the registration process.</p> <p>Your attention to these requests is appreciated.</p> <p><i>(Email sent on Friday, 21 November 2025)</i></p> <p><u>Re the Milnerton lagoon dredging proposal:</u></p> <p>I submitted questions for clarification re the proposal but to date had no feedback (apart from acknowledging receipt of my comments and questions.)</p> <p>I need urgent clarification re the requests in my comments.</p> <p>For simplicity I repeat them here:</p> <p>I would appreciate clarification on how the proposal will impact the visual aspect of the lagoon.</p> <p>To help me I need the following:</p> <ol style="list-style-type: none"> 1) Attached is a screen copy of the photo/diagram on the proposed sand banks to be created with the dumping of the sludge. <p>QUESTION:</p> <ol style="list-style-type: none"> 2) What is the impact on the area bounded by my yellow line and your polygon on the western side of the lagoon. I would appreciate clarification on how the proposal will impact the visual aspect of the lagoon. I went through the documents on the web site - quite a lot and I could have missed something, but I did not see any that helps one form a visual understanding. (I saw the diagram on pages 6 and 32 of the main report.) 	

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>Mockup: Can visual mockups be provided of the appearance of the lagoon after the creation of the sandbanks at low tide for someone standing</p> <ul style="list-style-type: none"> a) on the motor bridge b) at the edge of the lagoon at the centre of the grass on the eastern side c) at the edge of the lagoon in front of a housing unit on the western side <p>The mockups should obviously be accurate in terms of the planned width of the sandbanks and the channel as per the modelling that was done.</p>	
		<p>(Registration Form submitted on 05 December 2025)</p> <p>THE PLANNED CREATION OF SANDBANKS IS NOT SUPPORTED</p> <p>I previously submitted questions about the appearance of the lagoon after the planned dumping of dredged material on the edges of the lagoon. Your responses indicated that there were no mockups done or presentations made to show inhabitants at the edge of the lagoon what to expect. Instead, you provided photos of the state of the lagoon at low tide after the last flooding when the lagoon was particularly low and then tried to argue that the dumping on the edges will not materially change the appearance of the lagoon at low tide. These photos are, however, not reflecting the situation that we as inhabitants see day to day. Your photos were at an extreme stage. I attached photos taken at low tide on 4 December 2025 at 9:30. This shows clearly that the lagoon is full and at least still has the appearance of a lagoon. This is also the appearance of the lagoon at other times during the day.</p> <p>This look will be destroyed by your planned dumping. Sandbanks will appear when the tide goes out (and it is not even clear at what stage of the tide the sandbanks will start to appear). Looking at the information provided, on page 32 of your report, it looks like the lagoon is going to be changed into a shallow</p>	<p>Thank you for the comments provided on the Draft BAR. In response to your comments, it must be noted that dredging is not intended to, and cannot, return the lagoon to its pre-development state, and it must be considered a permanently altered system and managed in the manner that best achieves acceptable water quality in a system whose flows are made up almost entirely of treated effluent from the Potsdam WWTW during the summer months.</p> <p>In response to the photographs submitted, it must be acknowledged that the estuary is highly dynamic and has changed significantly in the last 50 years. An 'original state' is not a meaningful</p>

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		<p>stream with a width of about 40 % of the existing width! That is not in any way an improvement of the current situation.</p> <p>Needless to say, the impact on security and property values is going to be dramatic and totally unacceptable.</p> <p>What your photos actually show, is how much material has been dumped in the lagoon through flooding and pollution and the urgent need for proper dredging to return the lagoon to its original state. Obviously, the pollution issues need an even more urgent resolution. We long for a state of the lagoon where fishes thrive and bird life returns - especially the flamingo's and cormorants - as well as the odd seal. And where people can use it without fear for their health. (There used to be a canoe club that practiced on the lagoon on Fridays and over the weekends!).</p> <p>What you propose is, however, a situation that will require further/regular intervention at later stages, at further additional costs while in the interim destroying the appearance of the lagoon, the safety of the Woodbridge Island inhabitants as well as the property values around the lagoon. Further, the long-term outcome of the proposal does not even envision a return to the original state. This is a permanent change to the state and appearance of the lagoon. It is totally unacceptable.</p> <p>The current proposal will not restore the lagoon, and one cannot help but wonder why it is proposed. It seems that the only real beneficiaries will be the organisations and contractors behind the proposal who will stand to get a financial benefit if it is approved.</p> <p>At this stage I need to repeat my total opposition to the proposed sandbanks. The objective of the dredging must be to restore the lagoon.</p> <p>See attached my photos. Also refer to pages 6 and 32 in your proposal.</p>	<p>management target in this context. Remediating and improving the current state of the lagoon is, however, a priority and the proposed dredging is one of the remediation measures recommended with this intention.</p> <p>Sediment placement is proposed to occur at a level that remains submerged at high tide, thus preserving the current appearance of the lagoon. Sandbanks will be visible during the lowest tides, as is already the case in many places in the lagoon (refer to Figure 4-7 in Appendix G1 to the BAR).</p> <p>In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p> <p>The BAR outlines the limitations of the proposed dredging, which is not expected to achieve long-term ecological or aesthetic</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			<p>improvements without a significant reduction in polluted inflows from the Diep River. As such, it is proposed that dredging be delayed until water quality improves through current and planned remediation efforts.</p> <p>Hydrodynamic modelling conducted by Anchor Environmental (Pty) Ltd. (see Appendix G1 to the BAR) indicates that dredging will improve tidal exchange and dissolved oxygen levels in the lower lagoon, reducing chemical oxygen demand and helping to reduce anoxic conditions.</p> <p>Given the continued impacts on the lagoon, the applicant proposes to dredge, and the Alternative 1 dredging design is recommended as the lowest-risk and lowest-impact means of achieving the required tidal interchange.</p>
I&AP: Brian Hosking, Private – 28 November 2025			
P5		I object to the narrowing of the lagoon to the extent proposed because not only does it pose a significant threat to the security of residents and property on Woodbridge Island but the associated pollution from the dredging	In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>material to be deposited on the riverbanks would be a health risk and add to the already problematic stink.</p>	<p>water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p> <p>Dredging may involve some odour due to the disturbance of water and sediment during dredging. Current odours are predominantly caused by sewage flows rather than accumulated sediment, and the sediment in the lower lagoon is predominantly sand and its disturbance is not anticipated to have long-term effects on odour or health.</p>
I&AP: Di Gordon, Resident - Woodbridge Island – 28 November 2025			
P6		<p>Has the City consulted the original approved plan and design of Woodbridge Island, which took the design of its foundations into account given the lagoon. Those plans, principles and assumptions should be understood and maintained.</p> <p>I am also concerned how the dumping of the dredged material will impact the security of Woodbridge Island.</p>	<p>The proposed dredging operation is not anticipated to have any impact on the integrity of the Woodbridge Island revetment/seawall. Hydrodynamic and sediment transport modelling, including modelling of flood conditions, was undertaken as part of the project design.</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			<p>In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p>
<p>I&AP: Edoardo Martinuzzi, Resident - Woodbridge Island – 28 November 2025</p>			
P7		<p>I am a resident on Woodbridge Island, and the proposed dredging approach is a serious risk to residents on the island. The suggested approach will create sand banks next to the island and this will allow access to the island for anyone. The value of the properties will be negatively affected too. I suggest that the sand from the dredging be taken away from the lagoon in totality.</p>	<p>In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p> <p>Your suggestion is acknowledged, however, offsite disposal of a large volume of dredged material, including a high proportion of sand, would be cost-prohibitive and would result in an unjustifiable use of limited landfill airspace and</p>

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			municipal expenditure given the limited expected environmental benefits.
I&AP: Jacqueline Janks, Resident - Woodbridge Island – 28 November 2025			
P8		A different solution would be preferred.	Thank you for your comment on the Draft BAR. Kindly refer to Section H of the BAR, which demonstrates the various alternatives (site and property, activity, design and layout, technology and operational) assessed for the project and the motivation provided for the proposed preferred alternative.
I&AP: Leone Knight, Homeowner - Woodbridge Island – 28 November 2025			
P9		<p>Please ensure high security with regards to the Woodbridge island complex. Please prevent workers and undesirables access - devaluating our properties.</p> <p>Mud/ embankment sludge to be deposited on the R27 (Otto du Plessis drive) side of the lagoon and NOT on the security complex side.</p>	<p>In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p> <p>The management of construction personnel movement and behaviour is included within the</p>

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			EMPr (see Section 5.1 of the EMPr) and is the responsibility of the Contractor, as explicitly outlined for the Contractor in the EMPr and in other contractual documentation.
I&AP: Lorna Frader, Resident - Woodbridge Island – 28 November 2025			
P10		Concerned about the creation of mudflats against the wall of lagoon. My house is on the lagoon so worried about creation of the mudflats will be a security risk.	In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).
I&AP: Patricia Albedas, Resident - Woodbridge Island – 28 November 2025			
P11		I am against this project as it will have a negative effect on the security of Woodbridge Island. People who are living along the lagoon will suffer from the sediment most of the time.	In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).

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			<p>Dredging may involve some odour due to the disturbance of water and sediment during dredging. Current odours are predominantly caused by sewage flows rather than accumulated sediment, and the sediment in the lower lagoon is predominantly sand and its disturbance is not anticipated to have long-term effects on odour.</p>
<p>I&AP: Renee Brooks, Resident - Woodbridge Island – 28 November 2025</p>			
P12		<p>It is critically important that the original records of the foundation design and build of Woodbridge island that was signed off by the City of Cape Town are consulted, well understood and taken into consideration in anything the city engineers now plan, design and execute with the lagoon.</p> <p>The original design of Woodbridge Island took the environment into account with participation from the city planners, engineers and various departments. Those principles and assumptions must be honoured to ensure Woodbridge Island does not collapse or get overrun by water.</p>	<p>The coastal engineers responsible for project design have confirmed that the proposed dredging operation is not anticipated to have any impact on the integrity of the Woodbridge Island revetment/seawall. Hydrodynamic and sediment transport modelling, including modelling of flood conditions, was undertaken as part of the project design.</p> <p>Additionally, the Draft BAR and its associated appendices were circulated to the various I&APs, including organs of state, of which the City of Cape and its various line departments commented on the project.</p>

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I&AP: Will Taylor, Resident - Woodbridge Island – 28 November 2025			
P13		Dredged material should only be deposited on the eastern bank of the lagoon to avoid impacting the houses on the lagoon on Woodbridge Island - there are 350 plus houses on the development that would be affected from a security, aesthetic and health point of view.	<p>In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p> <p>Dredging may involve some odour due to the disturbance of water and sediment during dredging. Current odours are predominantly caused by sewage flows rather than accumulated sediment, and the sediment in the lower lagoon is predominantly sand and its disturbance is not anticipated to have long-term effects on odour.</p>
I&AP: Yvette Mayers, Homeowner - Woodbridge Island – 28 November 2025			
P14		As a homeowner on Woodbridge Island, I do agree that something needs to be done to improve the water quality of the lagoon, however I am concerned about the dredge being left on the embankment next to our homes which could cause a security risk enabling anyone to enter the estate other than through the main gate. My other concern is the smell of the dredging. If possible, to place the dredging on the opposite side of the lagoon closer to the R27.	In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks,

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			<p>(see Figure 2 on page 7 of the final BAR).</p> <p>Dredging may involve some odour due to the disturbance of water and sediment during dredging. Current odours are predominantly caused by sewage flows rather than accumulated sediment, and the sediment in the lower lagoon is predominantly sand and its disturbance is not anticipated to have long-term effects on odour.</p>
I&AP: Conrad Kuhne, Resident - Woodbridge Island – 29 November 2025			
P15		Not in favour of non-removal of sludge from the lagoon. Build-up of material in lagoon will lead to compromised security at Woodbridge Island by making it accessible from Marine Drive side.	In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).
I&AP: Ryan Basdeo, Resident - Woodbridge Island – 29 November 2025			
P16		Firstly, the ocean will bring back sand again and this dredging process will be a	The Estuarine Impact Assessment and Hydrodynamic Modelling Report (Appendix G1) assessed the dredging alternatives. The material is proposed to be deposited in such

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		<p>waste of time. Secondly, there could be further wave impact that could further erode coastline given the narrower channel. Thirdly, a deeper channel could start to erode the island from below i.e., undercutting.</p> <p>I feel there is a lot of natural balance that we could be interfering with; and we don't understand our impact. Thanks.</p>	<p>a manner as to be located in the intertidal zone, and will be wetted and dried during tidal cycles. This is therefore not anticipated to result in significant erosion or accretion.</p> <p>It is also worth noting that the lower lagoon is a highly dynamic environment and hydrodynamic function is a key driver of water conditions near the mouth of lagoons and estuaries. The proposed dredging, to occur when water quality shows improvement (indicated by increased available dissolved oxygen), is intended to improve the hydrodynamic function of this section of the lagoon, to enhance the positive effects of improving water quality.</p>
<p>I&AP: Jaco Botes, Resident - Woodbridge Island – 30 November 2025</p>			
P17		<p>(Registration Form submitted on 30 November 2025)</p> <p>I appreciate the need for dredging the lagoon for health and safety reasons, but strongly object to the dredged material being left in the lagoon or on the banks of the lagoon.</p> <p>The major benefit of the lagoon is from a safety point of view for the houses on its banks. If a sand bank cannot be allowed to form on the edges of the lagoon that remains open during low tide. It would have a dramatic negative</p>	<p>In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p>

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		<p>effect on the security and house prices of the houses on the lagoon edge if people could walk up to those houses from the beach or across the lagoon.</p> <p>We were promised lagoon dredging as a way to fix the house price decline due to the poor water quality. Dredging the lagoon and leaving the byproduct on the edges would have the opposite effect, and further erode our house values.</p> <p>Any further decline on our house values as a result of municipal negligence in sewage spills, or now the threat of dredging and leaving that silt behind, would make legal action or rates boycott against the municipality financially viable.</p>	<p>In 2022-2023 the accumulation of organic material and its decomposition in the absence of oxygen were the dominant cause of odours in the lagoon. Since then, a number of major flood events have scoured the system and the dominant source of foul odours more recently is the inflowing water itself. Major upgrades of WWTW infrastructure are underway and additional works scheduled for the next five years to address the source of the problem, and dredging is proposed as an additional remediation measure focused on improving tidal flushing of the lower lagoon.</p>
P18	<p>The following individuals submitted comments of the same content which has been collectively responded to below:</p> <p>I&AP: Jaco Botes, Resident - Woodbridge Island – 30 November 2025</p> <p>I&AP: Gail Packman, Resident – Woodbridge Island – 01 December 2025</p> <p>I&AP: Guy McDonald, Resident – Woodbridge Island – 01 December 2025</p> <p>I&AP: Johanna Botes, Homeowner – Woodbridge Island – 05 December 2025</p>		
		<p><i>(Letter submitted on 30 November 2025)</i></p> <p>1. INTRODUCTION AND STANDING</p>	<p>Support for the urgent need to remediate the Diep River Estuary is noted. The specific objections are</p>

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		<p>I submit this comment as a registered Interested and Affected Party (I&AP) and a property owner on Woodbridge Island. This submission is made in my personal capacity as a resident directly affected by the proposed activity.</p> <p>At the outset, I wish to record that I fully support the urgent need for remediation of the Diep River Estuary ("the Lagoon") due to the severe health and safety risks posed by current water quality levels. However, I formally object to Design and Layout Alternative 1 (The Preferred Alternative) insofar as it proposes the placement of dredged material within the lagoon to form intertidal sandbanks along the channel margins.</p> <p>My objection is based on three fatal flaws in the assessment of Alternative 1:</p> <ol style="list-style-type: none"> 1. Unmitigated security risks and social impact; 2. Diminution of property value and economic loss; and 3. The shifting of liability for municipal negligence onto private owners. <p>2. SOCIO-ECONOMIC IMPACT: SECURITY RISKS (NEMA SECTION 2(4)(i))</p> <p>The National Environmental Management Act (NEMA) requires that the social, economic, and environmental impacts of activities be considered, assessed, and evaluated.</p> <p>The Lagoon currently acts as a natural security barrier ("moat") for properties on the water's edge, particularly during low tide when the water depth and soft sediment prevent pedestrian access.</p> <p>The proposal to create "raised intertidal mudflats" or sandbanks along the edges of the channel creates a foreseeable security risk. By solidifying the banks and reducing the water barrier, the City effectively creates a pedestrian thoroughfare or "land bridge" accessible from the beach or public open spaces. This allows unauthorised access directly to the perimeter of private residences.</p>	<p>noted and responded to accordingly.</p> <p>The three social, economic and environmental impacts of the proposed dredging have been assessed in the Draft BAR.</p> <p>In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR). The Milnerton Lagoon is a highly dynamic estuary and has at times been shallower or deeper with</p>

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		<p>The Draft BAR fails to adequately assess the impact of this changed topography on crime and security. In a high-crime environment, the removal of a natural barrier constitutes a significant negative social impact that threatens the safety and bodily integrity of residents.</p> <p>3. ECONOMIC IMPACT: DIMINUTION OF PROPERTY VALUE</p> <p>The Draft BAR posits that the project will have a positive economic spin-off due to improved amenity value. I dispute this finding regarding Alternative 1.</p> <p>Property values on Woodbridge Island and the Lagoon edge are inextricably linked to two factors:</p> <ol style="list-style-type: none"> 1. Aesthetics/Amenity: The promise of a rehabilitated water body. 2. Security: The exclusivity and safety provided by the water barrier. <p>By placing dredged material (which contains high organic loads and is aesthetically unpleasing until rehabilitated) on the banks, and simultaneously compromising the security perimeter of these properties, the City creates a set of conditions that will actively depreciate property values.</p> <p>4. MUNICIPAL NEGLIGENCE AND DELICTUAL LIABILITY</p> <p>The necessity for this dredging arises largely from the collapse of the Potsdam Wastewater Treatment Works and the ongoing failure of sewage pump stations (e.g., Koeberg Road). These are failures of the City to perform its statutory mandates.</p>	<p>the natural flux of sediments in the system.</p> <p>The description of the potential positive impacts has been amended in the final BAR on page 72 to clarify that the potential improvement to amenity value would be improved public experience of residents, businesses and visitors that live and work nearby the lagoon because of a reduction in foul odour. With the anticipated increase in dissolved oxygen within the lower lagoon, the proposed dredging is expected to disrupt anoxic conditions and reduce sulphur-producing bacteria that generate the foul “rotten-egg” smell.</p>

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		<p>To implement Alternative 1 (disposal within the lagoon) purely because it is the “least costly” option (as stated in the BAR) is to externalise the cost of the City’s negligence onto the surrounding ratepayers.</p> <p>By choosing a method that threatens our security and property values to save on transport/disposal costs (i.e., avoiding off-site disposal), the City is arguably acting <i>mala fide</i>. Should the implementation of this project result in a breach of security or a demonstrable drop in market value, the Municipality exposes itself to:</p> <ul style="list-style-type: none"> • Delictual Claims: For damages arising from the negligent design of the dredging operation (creating a security hazard). • MPRA Objections: A coordinated objection by residents under the <i>Local Government: Municipal Property Rates Act</i>, necessitating a re-valuation of properties to reflect the degraded environmental and security context, thereby reducing the City's revenue base. <p>5. PREFERENCE FOR ALTERNATIVE 5 (OFF-SITE DISPOSAL) OR MODIFIED DESIGN</p> <p>The Draft BAR rejects Alternative 5 (Partial Off-Site Disposal) largely due to cost and logistical complexity. However, NEMA requires the selection of the Best Practicable Environmental Option (BPEO).</p> <p>An option that compromises the safety of human inhabitants and erodes their economic assets cannot be considered the BPEO.</p> <p>6. RELIEF SOUGHT</p>	<p>The proposed dredging is not intended as an economic intervention, but as a means to improve water quality in the lower lagoon and the quality of life of adjacent residents, as part of a suite of complementary remediation measures.</p> <p>The inflow of pollutants from WWTWs and pump stations as the key driver of recent water quality deterioration is clearly outlined in the BAR. However, the preferred alternative 1 is not motivated based on being the “least costly” remediation option. The preferred alternative is motivated for based on the anticipated benefits in relation to the costs, as required by the approved Estuarine Management</p>

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		<p>I hereby request that the Final Basic Assessment Report:</p> <ol style="list-style-type: none"> 1. Re-evaluate the Security Impact: Conduct a specialized security risk assessment to determine if the proposed sandbanks will facilitate pedestrian access to private properties at Low Mean Tide. 2. Modify the Design: If Alternative 1 is to proceed, the design must ensure that the dredged material is placed in a manner that maintains a non-navigable, deep-water channel immediately adjacent to private properties to act as a security barrier. 3. Prioritise Off-Site Disposal: Reconsider the rejection of off-site disposal for the sediment banks nearest to residential properties. <p>We were promised dredging to restore the environmental and economic health of this area. We will not accept a “half-measure” that trades water flow for our physical security.</p>	<p>Plan. No significant additional benefit would be attained by offsite disposal of material, although offsite disposal would involve significant additional costs both in financial terms and in terms of the impacts on residents due to the required dewatering. Off-site disposal is not considered feasible due to the large volume of mostly sandy material, the high cost of disposal, and the limited space available at landfills. These costs are difficult to justify, especially while pollution inflows into the lagoon remain unresolved. Refer to Section H of the BAR, which presents the assessment of alternatives and the motivation for the preferred alternative without off-site disposal. In the opinion of the EAP, the proposed alternative is the best practicable environmental option.</p> <p>s noted above, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and</p>

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			sandbanks, (see Figure 2 on page 7 of the final BAR).
Additional comments to the above			
I&AP: Guy McDonald, Resident – Woodbridge Island – 01 December 2025			
P19		I don't agree with the creation of "mudflats" as these will pose an immediate health risk. I attach my formal comments.	The proposed dredging is not anticipated to increase health risks associated with the lagoon
I&AP: Justine Botes, Resident - Woodbridge Island – 30 November 2025			
P20		<p>(Registration Form submitted on 30 November 2025)</p> <p>I submit this comment as a registered Interested and Affected Party (I&AP) and property owner on Woodbridge Island. While I support the Need for dredging to restore hydraulic capacity, I formally object to Alternative 1 (Preferred Design).</p> <p>My objection is based on the following grounds, supported by the specific technical appendices provided in the BAR:</p> <p>1. Fatal Flaw in Socio-Economic Assessment: The creation of intertidal sandbanks creates a <i>de facto</i> land bridge, breaching the security perimeter of Woodbridge Island properties, violating NEMA Section 2(4)(i).</p> <p>2. Improper BPEO Selection: The rejection of Off-Site Disposal (Alternative 5) is driven by administrative convenience (avoiding Waste Management Licences) rather than environmental or social best practice, as evidenced in the Pre-Application Minutes (App F7).</p>	<p>We appreciate your comments submitted on the Draft BAR. The objections raised on the proposed dredging are responded to accordingly.</p> <p>In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p>

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		3. Health and Nuisance Risks: The Estuary Impact Assessment (App G1) confirms the sediment is anoxic and organic-rich. Depositing this material on the banks creates an unacceptable health and olfactory risk contrary to the Need and Desirability (App K) objectives.	
P21		<p>The following individuals submitted comments of the same content which has been collectively responded to below:</p> <p>I&AP: Justine Botes, Resident - Woodbridge Island – 30 November 2025</p> <p>I&AP: Sarah Marx, Homeowner - Woodbridge Island – 30 November 2025</p> <p>I&AP: Mandy (Simpson) Thackway, Homeowner - Woodbridge Island – 30 November 2025</p> <p>I&AP: Brian Thackway, Homeowner - Woodbridge Island – 30 November 2025</p> <p>I&AP: Daniela Berowsky, Resident – Woodbridge Island – 01 December 2025</p> <p>I&AP: Linda Borean, Resident – Woodbridge Island – 01 December 2025</p> <p>I&AP: Heidi van der Meulen, Resident – Woodbridge Island – 02 December 2025</p> <p>I&AP: Seppe Sardo, Homeowner – Woodbridge Island – 05 December 2025</p>	
P22		<p>(Letter submitted on 30 November 2025)</p> <p>RE: FORMAL OBJECTION AND COMMENT ON DRAFT BASIC ASSESSMENT REPORT: PROPOSED DREDGING OF THE MILNERTON LAGOON (REF: 16/3/3/1/A1/18/3048/25)</p> <p>1. EXECUTIVE SUMMARY I submit this comment as a registered Interested and Affected Party (I&AP) and property owner on Woodbridge Island. While I support the Need for dredging to restore hydraulic capacity, I formally object to Alternative 1 (Preferred Design). My objection is based on the following grounds, supported by the specific technical appendices provided in the BAR: 1. Fatal Flaw in Socio-Economic Assessment: The creation of intertidal</p>	Alternative 5 was considered not to be the best practicable option due to cost and time implications and socio-economic impacts (sense of place, nuisance, rehabilitation requirements, traffic and safety concerns) as described in Section H of the BAR. All of these factors have to be considered when deciding the BPEO, and given that the desired outcome – improved

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		<p>sandbanks creates a de facto land bridge, breaching the security perimeter of Woodbridge Island properties, violating NEMA Section 2(4)(i).</p> <p>2. Improper BPEO Selection: The rejection of Off-Site Disposal (Alternative 5) is driven by administrative convenience (avoiding Waste Management Licences) rather than environmental or social best practice, as evidenced in the Pre-Application Minutes (App F7).</p> <p>3. Health and Nuisance Risks: The Estuary Impact Assessment (App G1) confirms the sediment is anoxic and organic-rich. Depositing this material on the banks creates an unacceptable health and olfactory risk contrary to the Need and Desirability (App K) objectives.</p> <p>2. PROCEDURAL AND LEGAL OBJECTIONS</p> <p>2.1. Failure to Assess Security Risks (NEMA Section 2(4)(i)) The National Environmental Management Act (NEMA) defines the "environment" to include the social and economic conditions of people. The Impact Assessment (Appendix J) fails to rate "Security" as a distinct impact. Currently, the subtidal water column acts as a natural security barrier ("moat") for properties zoned Single Residential (SR) on the lagoon edge. Alternative 1 proposes reshaping the channel to create "raised intertidal mudflats"1.</p>	<p>hydrodynamic function of the lower lagoon – can be achieved in Alternative 1, with fewer negative socio-economic implications, this was deemed the preferred alternative. Off-site disposal would likely have been necessary if the removal of accumulated organic material was the objective, but this is not the case given the natural scouring that occurred during the flood events in 2023 and 2024.</p> <p>Although accumulated organic material may have significantly contributed to anoxic sediment and poor water conditions in the past, flood events in 2023 and 2024 flushed much of the fine sediment from the lagoon into the sea. Despite this, oxygen levels have returned to near zero (barring brief periods of improved tidal flushing that brought oxygen rich seawater into the lagoon), indicating that polluted inflowing water is the primary concern. Dredging therefore targets the improvement of hydrodynamic functioning to improve water quality and reduce odour in the lower lagoon while</p>

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		<ul style="list-style-type: none"> • Impact: This design effectively creates a pedestrian thoroughfare accessible from public open spaces at Low Mean Tide. • Evidence: The Locality Map (Appendix A) and Zoning Map (Appendix E21) show a direct interface between the proposed work and private erven. • Deficiency: By failing to conduct a Security Risk Assessment, the EAP has not assessed a material "negative social impact" that threatens the safety of residents. <p>2.2. Flawed "Need and Desirability" (Appendix K)</p> <p>Appendix K argues that the project improves "amenity value." However, placing dredged spoil on the banks immediately adjacent to residential homes destroys amenity value through visual degradation and odour. The "Need" for hydraulic restoration does not justify the "Desirability" of the chosen disposal method. The proposal prioritizes hydraulic modelling over the lived reality of the human environment.</p> <p>3. TECHNICAL OBJECTIONS TO PREFERRED ALTERNATIVE 1</p> <p>3.1. Sediment Quality and Health Risks (Reference: App G1)</p> <p>The Estuary Impact Assessment (Appendix G1) confirms that the system acts as a sink for catchment-derived pollutants. The sediment to be dredged is described as having high organic content and being anoxic.</p> <ul style="list-style-type: none"> • The Risk: Excavating anoxic, sulphide-rich sediment and exposing it to air on the banks will release Hydrogen Sulfide and potential airborne pathogens. • The Flaw: The EMPr (Appendix H1) suggests standard odour control, but this is insufficient for "in-situ" disposal within meters of residential windows. The 	<p>measures to improve influent water quality are underway.</p> <p>As noted above, adjustments have been made to the preferred alternative in the project proposal to respond to this security concern.</p> <p>The BAR clearly sets out the rationale for the preferred alternative, which is not driven by administrative convenience but by a consideration of the impacts and benefits of a number of options.</p> <p>Dredging may involve some odour due to the disturbance of water and sediment during dredging. Current odours are predominantly caused by sewage flows rather than accumulated sediment, and the sediment in the lower lagoon is predominantly sand and its disturbance is not anticipated to have long-term effects on odour.</p> <p>The proposal retains a deep (in fact, deepened) subtidal channel down the centre of the lagoon. As noted above, adjustments have been made to the preferred alternative in the project proposal to respond to the concern about access from</p>

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		<p>"remediation" claimed in the BAR effectively concentrates the pollutants on the residents' doorstep rather than removing them from the system.</p> <p>3.2. Regulatory Avoidance as a Driver (Reference: App F7 & E5) A review of the Pre-Application Meeting Minutes (Appendix F7) and DFFE Correspondence (Appendix E5.1/E5.2) reveals that the rejection of Alternative 5 (Offsite Disposal) was heavily influenced by the desire to avoid triggering a Waste Management Licence (WML) or Dumping at Sea Permit.</p> <ul style="list-style-type: none"> • Argument: "Administrative complexity" is not a valid ground for rejecting the Best Practicable Environmental Option (BPEO). If Off-Site Disposal (Alternative 5) mitigates the security and health risks to residents, the City is legally obliged to pursue the necessary permits, rather than choosing the "easier" path (Alternative 1) that compromises residents' rights. <p>3.3. Inadequacy of the Maintenance Management Plan (App H2)</p> <p>The MMP (Appendix H2) allows for ongoing maintenance dredging. If Alternative 1 is approved, it sets a precedent for all future maintenance. This means the residents face a perpetual cycle of their security barrier being</p>	<p>Loxton Road bridge to the water's edge properties, but it must also be acknowledged that the Diep River Estuary does not exist primarily as a security system for adjacent residents, and that remediation measures targeting habitat and water quality improvements are an obligation of the authorities responsible for its management.</p> <p>The BAR states that the anticipated outcome of the proposed dredging is improving tidal exchange in the lower part of the lagoon, with the intention of improving the conditions for adjacent residents. This has been clarified in Appendix K on page 7. The lagoon is a highly dynamic system and at times is already characterised by visible sandbanks.</p> <p>Whilst the risk of odour associated with sediment disturbance is acknowledged, the primary source of odour since the major flood events of 2023 and 2024 is believed to be the inflowing water itself, rather than any significant buildup</p>

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		<p>eroded and sludge being deposited on their banks every time maintenance is required. The MMP lacks specific "Trigger Values" for security breaches (e.g., if a sandbank becomes walkable, it must be removed).</p> <p>4. ECONOMIC IMPACT AND MUNICIPAL LIABILITY</p> <p>4.1. Diminution of Property Value</p> <p>The "Beneficial Use" of sediment argument in the BAR is flawed. There is no "benefit" to a property owner in having a security barrier replaced by a mudflat. This constitutes a direct devaluation of the property.</p> <ul style="list-style-type: none"> • Legal Consequence: Should this proceed, affected owners may reserve their rights to object to the General Valuation roll under the Municipal Property Rates Act, citing the material change in security and amenity caused by the Municipality's engineering works. <p>4.2. Causality and Negligence</p> <p>The need for dredging arises largely from the failure of municipal infrastructure (Potsdam WWTW). For the Municipality to now propose a solution that stores the byproduct of that negligence (contaminated silt) within the lagoon, rather than paying to remove it (Alternative 5), is an act of mala fides. The residents should not bear the "externalized cost" of the City's infrastructure failure in the form of reduced security.</p> <p>4. RELIEF SOUGHT</p> <p>I request that the Competent Authority and the EAP take the following actions before finalizing the Basic Assessment Report:</p> <ol style="list-style-type: none"> 1. Commission a Security Impact Assessment: A specialized study must determine if the proposed bank profiles in Alternative 1 will allow pedestrian access to private properties at Low Spring Tide. 2. Re-Assess Alternative 5: The Economic Assessment must weigh the cost of off-site disposal against the potential devaluation of adjacent private 	<p>of organic matter in the lower estuary. The proposed intertidal areas will be subject to daily submersion during tidal cycles.</p> <p>Alternative 5 was considered not to be the best practicable option due to cost and time implications and socio-economic impacts (sense of place, nuisance, rehabilitation requirements, traffic and safety concerns) as described in Section H of the BAR. All of these factors have to be considered when deciding the BPEO, and given that the desired outcome – improved hydrodynamic function of the lower lagoon – can be achieved in Alternative 1, with fewer negative socio-economic implications, this was deemed the preferred alternative. Off-site disposal would likely have been necessary if the removal of accumulated organic material was the objective, but this is not the case given the natural scouring that occurred during the flood events in 2023 and 2024.</p> <p>As noted above the purpose of the proposed dredging is to address estuarine function and associated</p>

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		<p>property and the cost of increased security risks. The "administrative burden" of permits must be disregarded in favour of the BPEO.</p> <p>3. Amend the EMPr (Appendix H1): Include a strict condition that "No dredged material may be placed within 20 meters of a residential boundary or in a manner that reduces the water depth below 1.5 m at Low Mean Tide immediately adjacent to private erven."</p> <p>4. Reject "In-Lagoon" Disposal for Upper Reaches: For the section of the lagoon adjacent to Woodbridge Island, the only acceptable alternative is the removal of spoil from the system.</p>	<p>water quality. The MMP provides for future maintenance, only if it becomes necessary to respond to mouth closure. Security concerns will not in themselves be a driver of interventions within the lagoon in terms of the MMP.</p> <p>The benefits discussed in the BAR associated with the placement of dredged material on the sides of the channel are intended to highlight the potential positive impacts of this method. Dredging is proposed as a remediation measure, which by definition is intended to be beneficial to the environment and people who live in and around the lagoon. The security concerns have been addressed in responses to 3.2 and 3.3 above.</p> <p>Removal of dredged sand to be deposited at a landfill would be costly, but is also not expected to result in greater benefit to the lagoon in comparison to the proposed preferred alternative. As set out in the BAR, a number of projects are underway in the CCT to address the causes of pollution.</p>

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			<p>As noted above, adjustments have been made to the preferred alternative in the project proposal to respond to this security concern.</p> <p>Please refer to the responses above regarding Alternative 5.</p> <p>In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p>
I&AP: Paul Alexander, Resident - Woodbridge Island – 30 November 2025			
P23		<p>I object to the sand being dumped on the Woodbridge Island shore as it will create a mudflat and compromise our security. It can also easily wash back making the dredging futile. Sand should be removed entirely from the dredging site.</p>	<p>In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p> <p>Removal of sand from the site is not proposed due to the large volume, the high cost of disposal, the limited</p>

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			<p>space available at landfills, and the significant disturbance that would be involved in dewatering and transporting the material. These costs are difficult to justify, especially while pollution inflows into the lagoon (rather than sediment build-up) are the driver of poor water quality.</p>
<p>I&AP: Brett Webb, Resident - Woodbridge Island – 30 November 2025</p>			
P24		<p>I reside in Woodbridge Island, and I'd like to make it known that I'm against the dredging as it will negatively affect me as a tax payer. It will create a bank that will allow criminals to enter from the lagoon side. It also lowers my property value as I'm lagoon facing, and the banks will look terrible and attract all sorts of bugs. Thank you.</p>	<p>Your concerns about safety, property value, and visual impact are acknowledged. In response to security concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR). Additionally, the sediment will be placed at a level that remains submerged at high tide, helping preserve the lagoon's current appearance.</p>
<p>I&AP: Catherine Alexander, Resident - Woodbridge Island – 01 December 2025</p>			

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
P25		<p>I object to the sand been dredged out of the Lagoon been dumped along the Lagoon front of Woodbridge Island Lagoon wall.</p> <p>This is a Security, Health risk and will not be good for investments, public health and safety.</p> <p>The CoCT need to transport the polluted sand to another area that is not populated.</p> <p>The Lagoon needs to be returned to it Ecological Healthy Ecosystem we experienced when we moved to the Island 30 years ago.</p> <p>Please can the CoCT listen to the Residents of Woodbridge Island and commit to removing the sand offsite to help the community and Environment.</p> <p>Hoping for positive action from CoCT, ASAP.</p>	<p>Your objection to the placement of dredged material along the western edge of the dredged channel is noted. The concerns raised regarding security impacts on Woodbridge Island residents have been carefully considered. In response to these concerns raised by Woodbridge Island residents, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).</p> <p>Whilst your suggestion that the City remove dredged material off-site is acknowledged, offsite disposal of a large volume of sediment, which is predominantly sand, would be cost-prohibitive and would result in an arguably unjustifiable use of limited landfill airspace and municipal expenditure given the limited expected environmental benefits since the inflows into the lagoon are highly polluted and driving the</p>

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			<p>current poor water quality conditions.</p> <p>The proposed dredging is intended to improve the tidal exchange to provide a localised improvement in water quality. Because the primary driver of water quality is the upstream inflows, the main focus in response is the improvement of inflowing water quality by addressing upstream infrastructure issues. We refer you to read particularly the executive summary of the BAR, which presents the 'Current and Planned Pollution Remediation in the Diep River Estuary' and the 'Limitations of Dredging as a Remediation Measure'.</p>
<p>I&AP: Caronne De Wet, Resident – Woodbridge Island – 01 December 2025</p>			
P26		I am quite shocked that this dredging process is being considered as proposed.	Your comment is acknowledged, however, you are referred to Section H of the BAR to review the comparative assessment of the alternatives for remediation of the pollution within the lagoon to

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			understand why the preferred alternative is herein motivated for.
I&AP: Eliot Powell, Resident – Woodbridge Island – 01 December 2025			
P27		I am concerned at the proposal for dumping of the dredged material on both sides of the lagoon as this will impact security of the entire Island as the bank will be walkable at low tide. Lagoon-side properties may also no longer be next to water but next to mud banks impacting property values. A better solution would be for dredged material be dumped on the Milnerton-side bank only.	Your concerns regarding security and property value for the residents of the Woodbridge Island are fully acknowledged. In response to feedback from Woodbridge Island residents, including concerns about potential security risks, the proposal has been adjusted to ensure that deeper water remains between the Loxton Road bridge and the proposed dredge channel and sandbanks, (see Figure 2 on page 7 of the final BAR).
I&AP: John De Wet, Private – 01 December 2025			
P28		This proposed dredging recommendation is a shocking solution, as it stands.	Thank you for your comment. We refer you to Section H of the BAR, which provides a comparative assessment of the various alternatives for addressing pollution in the lagoon and explains the rationale behind the selection of the preferred alternative.
I&AP: Marc Miller, Private – 01 December 2025			

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
P29		<p>Objection to the Proposed Dredging Approach for the Milnerton Lagoon</p> <p>I would like to formally raise my objection to the current proposal to dredge the Milnerton Lagoon while leaving the sand and contaminated material behind. This approach is not only ineffective but potentially harmful. Leaving the polluted sand in place is toxic and will only exacerbate the existing environmental issues rather than resolve them.</p> <p>The sand and sediment within the lagoon are already polluted with chemicals, faecal matter, and other contaminants. Simply dredging and damming up the material on site does not address the root problem.</p> <p>In fact, it risks further concentrating the pollution and allowing it to leach back into the water system.</p> <p>For the Lagoon to recover and for the public to have confidence in the rehabilitation process, all contaminated sand and sediment must be removed from the site entirely. Proper offsite disposal is the only responsible and sustainable solution.</p> <p>I strongly urge that the plan be revised to include full removal of polluted sand so that the long-term health of the Milnerton Lagoon and surrounding environment can be safeguarded.</p>	<p>We take note of your objection to the proposed dredging of the Milnerton Lagoon and concern for the long-term health of the Milnerton Lagoon. Whilst the limitation of the benefits of the proposal within the lower lagoon are clearly indicated in the BAR and within the Estuarine Impact Assessment (Appendix G1 to the BAR), that does not imply the dredging would be ineffective, provided it takes place alongside improvements in inflowing water quality.</p> <p>Sediment samples collected in the lower lagoon in November 2023 as part of the dredging investigations were tested for trace metals as well as a full suite of organic and other contaminants. These samples were specifically targeted to include the areas of highest accumulation of fine sediments. In these samples, six metals (arsenic, cadmium, chromium, lead, nickel, and zinc) were all detected at lower concentrations than those reported in 2021. Guideline values for chronic</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			<p>and acute ecological impact were not exceeded, and available data do not suggest that metal contaminants are a significant driver of ecological impact in the Milnerton Lagoon.</p> <p>Although in the past sediment was dominated by organic material, and hence, the previous dredging alternatives considered removal of sediment off-site, natural flooding in 2023 - 2024 removed much of the organic material from the lower lagoon and temporarily improved conditions, but these improvements were not sustained in 2024/2025 due to increased pollution in the water from failing waste water treatment infrastructure. Therefore, the poor water quality and odour currently experienced is predominantly caused by contaminated water as opposed to sediment.</p> <p>Offsite disposal of a large volume of sediment, including a high proportion of sand, would be cost-prohibitive and would result in an</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			arguably unjustifiable use of limited landfill airspace and municipal expenditure given the limited expected environmental benefits.
I&AP: Prinda Pillay, Resident – Woodbridge Island – 01 December 2025			
P30		<p>My objection is based on the following grounds, supported by the specific technical appendices provided in the BAR:</p> <p>Fatal Flaw in Socio-Economic Assessment: The creation of intertidal sandbanks creates a de facto land bridge, breaching the security perimeter of Woodbridge Island properties, violating NEMA Section 2(4)(i).</p> <p>Improper BPEO Selection: The rejection of Off-Site Disposal (Alternative 5) is driven by administrative convenience (avoiding Waste Management Licences) rather than environmental or social best practice, as evidenced in the Pre-Application Minutes (App F7).</p> <p>Health and Nuisance Risks: The Estuary Impact Assessment (App G1) confirms the sediment is anoxic and organic-rich. Depositing this material on the banks</p>	<p>Thank you for your comments submitted on the Draft BAR. We've carefully considered your objections, and respond as follows.</p> <p>The concern about a potential land bridge affecting security at Woodbridge Island has been addressed. The project design has been revised after consultation with the project engineers and dredged material will not be placed directly adjacent to the western bank of the Loxton Road bridge to avoid the risk of a land bridge forming in this section during low tide (see Figure 2 on page 7 of the final BAR).</p> <p>As explained in Section H and Section I (question 8) of the BAR, the preferred alternative was selected based on environmental, technical, and cost considerations, and is supported as the BPEO. Alternative</p>

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		<p>creates an unacceptable health and olfactory risk contrary to the Need and Desirability (App K) objectives.</p>	<p>5 was considered not to be the BPEO due to cost and time implications and socio-economic impacts (sense of place, nuisance, rehabilitation requirements, traffic and safety concerns) as described in Section H of the BAR. All of these factors have to be considered when deciding the BPEO, and given that the desired outcome – improved hydrodynamic function of the lower lagoon – can be achieved in Alternative 1, without as high negative socio-economic implications, this was deemed the preferred alternative. Off-site disposal would likely have been necessary if the removal of accumulated organic material was the objective, but this is not the case given the natural scouring that occurred during the flood events in 2023 and 2024, described below.</p> <p>While earlier studies noted that the sediment was rich in organic matter and had odour issues, natural flooding in 2023 and 2024 removed much of this material, approximately 110,000 m³, and</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			<p>temporarily improved conditions. Unfortunately, pollution from upstream sources increased again in late 2024 and 2025, worsening water quality. Based on this, the project team believes that poor water quality, not the sediment, is the main cause of poor water quality and the associated odour and health concerns.</p> <p>We hope this helps clarify the reasons behind the current proposal and the changes made in response to public input.</p>
I&AP: RethinkTheStink NPC – 01 December 2025			
P31		<p>While the Milnerton Lagoon dredging initiative is welcomed, I wish to raise material concerns regarding the current sediment management approach and its longer-term effectiveness when assessed against established engineering and environmental best practice.</p> <p>From a coastal and hydraulic engineering perspective, dredging that does not permanently remove a sufficient volume of sediment from the active system remains vulnerable to re-deposition during moderate to major flood events. International and local best practice for estuarine and lagoon remediation supports the partial removal of dredged material from the</p>	<p>Thank you for your detailed submission. Your support for the dredging initiative is appreciated, and your concerns regarding sediment management, long-term effectiveness, and property impacts have been carefully considered.</p> <p>Sediment transport modelling was undertaken to confirm the potential for redeposition during flood events, and in fact found that the proposed</p>

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		<p>system—often via an approved offshore or coastal disposal process—to secure durable capacity gains and measurable long-term benefit. Although this option would require additional permitting, time and cost, it offers substantially greater resilience and lifecycle value.</p> <p>Secondly, the proposal to place banks of organic, decaying material immediately adjacent to Woodbridge Island properties is unacceptable. Such an outcome would effectively convert premium waterside properties into mudbank-adjacent properties, with a likely corresponding devaluation. This would expose the City to material legal and financial risk, including the potential for a class action by affected property owners.</p> <p>In addition, placing organic dredged material in close proximity to residential areas— in some cases within two metres of living-room windows—would:</p>	<p>channel would result in increased scour during these events, reducing the likelihood of sediment accretion in the lagoon. With respect to your concern about re-deposition and long-term durability, while dredging usually does involve partial off-site disposal, this option was assessed (refer to Section H of the BAR) and found to be of very limited additional benefit relative to the high additional costs and impacts. The analysis of alternatives must be based on the understanding that water quality in the lagoon is currently largely influenced by pollution inflows from the catchment as opposed to a substantial sediment accumulation, which would be a more usual driver of dredging projects.</p> <p>Your objection to sediment being placed adjacent to Woodbridge Island is acknowledged. In direct response to the security aspects of this concern, as also raised by other residents during this commenting process, the project design has been revised after consultation with</p>

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		<ul style="list-style-type: none"> • Lead to increased foul odours, materially reducing residents' quality of life • Increase security risks by creating walkable mudflats that allow easier access to waterside properties <p>From both an engineering-risk and environmental-health perspective, these impacts are foreseeable and avoidable. Relocating sediment placement to the Otto du Plessis side of the lagoon aligns more closely with accepted buffer, setback, and impact-management principles, while still achieving the project's functional objectives.</p> <p>I respectfully urge reconsideration of the sediment placement strategy to align this project with recognised engineering, environmental, and risk-management best practice, and to ensure a durable intervention that avoids introducing unnecessary social, legal, and financial liabilities for the City.</p>	<p>the project engineers to retain a deeper area downstream of the Loxton Road bridge (see Figure 2 on page 7 of the final BAR). This adjustment avoids introducing walkable access at low tide.</p> <p>The proposed channel and its intertidal banks will function more optimally if flows are as concentrated as possible – hence the retention of material placement on the western side of the channel.</p> <p>The dredging proposal forms part of a broader, phased effort that includes ongoing infrastructure upgrades, and has been designed as far as possible to achieve the desired water quality outcomes with minimal impact on residents. Ongoing communication and engagement will be a necessity during the implementation phase to ensure this remains the case.</p>

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I&AP: John Veasey, Homeowner – Woodbridge Island – 02 December 2025			
P32		<p>As a resident of Woodbridge Island, I object to the dredged material being placed on our side of the lagoon close to the houses on Woodbridge Island.</p> <ol style="list-style-type: none"> 1. We do not want a situation that a land bridge at low tide is created which will enable pedestrian access to the residential properties. 2. This will affect our security. Most of the houses do not have alarm system. 3. The sediment could be toxic and could possibly become a health risk for the residents of Woodbridge Island Estate. 	<p>In response to security concerns from Woodbridge Island residents, the project design has been revised after consultation with the project engineers and dredged material will not be placed directly adjacent to the western bank of the Loxton Road bridge to avoid the risk of a land bridge forming in this section during low tide (see Figure 2 on page 7 of the final BAR).</p> <p>Sediment samples collected in the lower lagoon in November 2023 as part of the dredging investigations were tested for trace metals as well as a full suite of organic and other contaminants. These samples were specifically targeted to include the areas of highest accumulation of fine sediments. In these samples, six metals (arsenic, cadmium, chromium, lead, nickel, and zinc) were all detected at lower concentrations than those reported in 2021. Guideline values for chronic and acute ecological impact were not exceeded, and available data</p>

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		<p>Is it possible for the dredged material to be deposited as close as possible to the East bank of the lagoon where an excavator could be used to remove the sediment from the lagoon and lorries could be used to dump the sediment elsewhere.</p>	<p>do not suggest that metal contaminants are a significant driver of ecological impact in the Milnerton Lagoon.</p> <p>Although in the past sediment was dominated by organic material, and hence, the previous dredging alternatives considered removal of sediment off-site, natural flooding in 2023 - 2024 removed much of the organic material from the lower lagoon and temporarily improved conditions, but these improvements were not sustained in 2024/2025 due to increased pollution in the water from failing waste water treatment infrastructure. Therefore, the poor water quality and odour currently experienced is predominantly caused by contaminated water as opposed to sediment.</p> <p>We take note of your objection to the proposed dredging of the Milnerton Lagoon and concern for the long-term health of the Milnerton Lagoon. Whilst the limitation of the benefits of the proposal within the lower lagoon are clearly indicated in the BAR and</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
			<p>within the Estuarine Impact Assessment (Appendix G1 to the BAR), that does not imply the dredging would be ineffective, provided it takes place alongside improvements in inflowing water quality.</p> <p>Sediment samples collected in the lower lagoon in November 2023 as part of the dredging investigations were tested for trace metals as well as a full suite of organic and other contaminants. These samples were specifically targeted to include the areas of highest accumulation of fine sediments. In these samples, six metals (arsenic, cadmium, chromium, lead, nickel, and zinc) were all detected at lower concentrations than those reported in 2021. Guideline values for chronic and acute ecological impact were not exceeded, and available data do not suggest that metal contaminants are a significant driver of ecological impact in the Milnerton Lagoon.</p>

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			<p>Although in the past sediment was dominated by organic material, and hence, the previous dredging alternatives considered removal of sediment off-site, natural flooding in 2023 - 2024 removed much of the organic material from the lower lagoon and temporarily improved conditions, but these improvements were not sustained in 2024/2025 due to increased pollution in the water from failing waste water treatment infrastructure. Therefore, the poor water quality and odour currently experienced is predominantly caused by contaminated water as opposed to sediment.</p> <p>Offsite disposal of a large volume of sediment, including a high proportion of sand, would be cost-prohibitive and would result in an arguably unjustifiable use of limited landfill airspace and municipal expenditure given the limited expected environmental benefits.</p>
I&AP: James Ryan, Lagoon Beach Hotel Director – 03 December 2025			
P33		I am a director of Lagoon Beach Hotel Pty Limited, which is the owner and operator of Lagoon Beach Hotel (the "Hotel"). I am also a trustee of Lagoon	Thank you for your detailed comments submission. Your support

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>Beach Body Corporate, which encompasses both the Hotel, the connected apartments (the "Apartments") and Wang Thai restaurant. On a day-to-day basis, I represent the owner of the Hotel. I am based in Dublin, Ireland but travel approximately 6 times a year to Cape Town and have been doing so for 15 years now. Copied on this email is Pieter Buitdendag, my fellow director of Lagoon Beach Hotel Pty Limited and General Manager of the Hotel, chairman of Lagoon Beach Body Corporate and finally a Milnerton resident.</p> <p>As a general principal, the Hotel is supportive of anything the City of Cape Town ("CCT") is willing to do to:</p> <ol style="list-style-type: none"> 1. Eliminate the overbearing odour emanating from the lagoon or elsewhere (the "Odour") 2. Reduce water pollution levels in the lagoon and ocean (the "Pollution") <p>I do not need to give you any background on the Odour or the Pollution other than to take this opportunity to give you the perspective of the Hotel and its guests.</p> <p><u>The Odour</u></p> <p>There are days when the Odour permeates all parts of the Hotel. Guests complain that their toilet is blocked. Guests complaint that the pipes in the Hotel are blocked and that the Hotel is not properly maintained. Many guests correctly identify that the Odour is coming from the lagoon and presumably use google to learn that raw sewerage is pumped into the lagoon. Guests leave online reviews to that effect, which severely damages the reputation</p>	<p>for elimination of odour emanating from the lagoon, and a reduction in pollution levels, is duly noted.</p> <p>The CCT is aware that sewage-derived pollution is the major contributor to water quality in the estuary. In response to the impacts</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>of the Hotel. I attach an illustrative selection of reviews from the last 12 months highlighting the Odour. In the age of AI, some queries about Lagoon Beach Hotel also make reference to the Odour.</p> <p><u>The Pollution</u></p> <p>To a lesser extent relative to the Odour, the Hotel's business is damaged by the Pollution. Given the water temperatures, ocean swimming is not high priority to many guests. But nonetheless there are some who are interested and are disappointed to find signage recommending they should not swim – and of course the signage is accurate. One of the Hotel's primary USP's is its location on the beachfront. That USP is severely damaged by the Pollution. To avoid duplication, I have not searched for reviews referencing the water pollution but needless to say they exist.</p> <p>A few years ago, I recall an aerial photograph of the lagoon water entering the sea, with its large area of discolouration, circulating and receiving much attention on social media. A search online continues to produce newspaper articles with this image, which are damaging to the business of the Hotel https://iol.co.za/capeargus/news/2021-07-26-call-for-urgent-investigation-into-milnerton-lagoon-sewage-spill/.</p> <p>The Hotel sources guests from all over the world. The situation with the lagoon is damaging not only for the Hotel but also for brand Cape Town. I would encourage the CCT to do what they can to resolve this situation on an urgent basis.</p> <p><u>Concerns</u></p>	<p>on the estuary caused by failing sewage infrastructure, the CCT initiated a series of ongoing and planned projects to reduce pollution in the canal and estuary and to upgrade infrastructure across the catchment.</p> <p>The detrimental effects on the Hotel's reputation, unique selling proposition and on the City at large are understood and sympathised with.</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>We are not experts on environmental matters. Two concerns come to mind:</p> <ol style="list-style-type: none"> 1. Whether the dredging would in any way increase flood risk, particularly during spring tides. During 2024, it became impossible for coastal properties to get flood insurance in the South African market. The insurance market seems to have relaxed again in 2025 and the Hotel and Apartments have flood insurance again, albeit with a 10% deduction. During spring tides, the high tide level of the lagoon will often exceed the boardwalk level. I ask that any dredging plan takes flood risk into consideration. 2. Disruption to the Hotel during the dredging. We are concerned that the Odour might be a problem during the dredging. We also note it is proposed to use the area in front of Wang Thai to access the lagoon. We are concerned that the works in general will be disruptive. We ask that works take place during winter, which is low season for the Hotel. <p>Thank you for the opportunity to participate. We are happy to engage further on any issue, should the need arise.</p>	<p>The coastal engineers responsible for project design have confirmed that the proposed dredging operation is not anticipated to have any impact on flooding. Hydrodynamic and sediment transport modelling, including modelling of flood conditions, was undertaken as part of the project design. The proposed dredging will not alter the volume of sediment in the lagoon and is not expected to affect flood risk.</p> <p>The potential for disruption to activities and residents around the lagoon during the dredging phase is noted. This may include noise and other disturbance. The access alternative off Lagoon Beach drive (at Boundary Road), provides direct access to the beach while avoiding any dune vegetation. Adjacent landowners will need to be consulted with by the contractor when determining the appropriate</p>

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			<p>access point.</p> <p>Thank you for these comments and inputs. Ongoing communication and engagement between the contractor, the CCT, and affected residents will be required and is proposed as a management measure in the EMPr, to ensure that all avoidable nuisance and disturbance are avoided or resolved.</p>
I&AP: Jan Burkhard Blum, Homeowner – Woodbridge Island – 05 December 2025			
P34		<p>I am acting as the chairperson of the trustees of the Woodbridge Island Body Corporate. I am a homeowner as well on Woodbridge Island. I am therefore personally affected by pollution of the lagoon water and air. The issues I raised in attached comments and requests could have a long-term effect on security and coastal erosion on the island. As trustees we are representing also the lagoon facing property owners who could be affected by the planned measures.</p> <p>Comments: please keep us also WBIBC in the loop: admin@wbibc.co.za</p> <p>The Woodbridge Island Body Corporate acknowledges and appreciates the City of Cape Town's continued efforts to mitigate air and water pollution, as well as to reduce harmful gas emissions in the Milnerton Lagoon area. Notwithstanding these efforts, we wish to provide formal comment on specific aspects of the proposed dredging activities. We respectfully request that the planned undertakings be executed with due consideration of the following matters:</p>	<p>Thank you for our comments – we take note that you are personally affected by pollution within the lagoon and have registered the Woodbridge Island Body Corporate (WBIBC) as an I&AP on the project. You will therefore be updated as the project application progresses, and if any additional information or comment periods take place on the project.</p> <p>Your support for the City's efforts to mitigate air and water pollution is appreciated, and your specific matters raised on the proposed</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>1. Preferred Dredging Method: The Draft Basic Assessment Report (November 2025) for the Proposed Dredging of the Milnerton Lagoon in the Diep River Estuary, Cape Town (EIA Reference: 16/3/3/1/A1/18/3048/25) identifies a preferred dredging method (on page 6) that involves the creation of sludge and sand embankments on either side of the dredged channel.</p> <p>The Woodbridge Island Body Corporate is concerned that such embankments could result in continued or increased emissions of malodorous gases, adversely affecting properties on the Woodbridge Island lagoon frontage. We therefore respectfully request a detailed assessment of whether the formation of these sludge and sandbanks may lead to additional or prolonged gas emissions impacting residents. As an alternative, we propose that consideration be given to off-site storage of the dredged material or, where feasible, disposal via pumping into the ocean.</p>	<p>dredging have been carefully considered.</p> <p>Although accumulated organic material may have significantly contributed to anoxic sediment and poor water conditions in the past, flood events in 2023 and 2024 flushed much of the fine sediment from the lagoon into the sea. Despite this, oxygen levels have returned to near zero (barring brief periods of improved tidal flushing that brought oxygen rich seawater into the lagoon), indicating that polluted inflowing water is the primary concern. Dredging therefore targets the improvement of hydrodynamic functioning to improve water quality and reduce odour in the lower lagoon while measures to improve influent water quality are underway.</p> <p>Your alternative suggestion to remove the dredged material off-</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>2. Security Considerations: The lagoon has historically served as a natural deterrent to trespassing and criminal activity. The introduction of new sandbanks may reduce this natural barrier and facilitate easier access to lagoon-facing properties and, more broadly, to Woodbridge Island - which constitutes a controlled security estate. The removal or diminution of this natural obstacle may pose heightened security risks, with potential adverse implications for resident safety, quality of life, and property values. We accordingly request that the security implications of any artificial embankments be carefully evaluated.</p> <p>3. Coastal and Structural Integrity: Dredging activities, particularly when combined with tidal dynamics, may contribute to coastal or lagoon-side erosion. The lagoon-facing edge of Woodbridge Island is currently protected by aging and potentially vulnerable revetment structures, including concrete retaining systems. Any dredging operations must therefore be assessed with respect to additional mechanical and hydrodynamic stresses placed on these structures. Post-dredging sediment redistribution may further weaken</p>	<p>site or otherwise pump to sea is noted. However, these options are not considered feasible due to the large volume of mostly sandy material, the high cost of disposal, and the limited space available at landfills. These costs are difficult to justify with the associated limited benefits, especially while pollution inflows into the lagoon remain unresolved. Refer to Section H of the BAR, which presents the assessment of alternatives (which considered the suggested alternatives) and the motivation for the preferred alternative without off-site disposal.</p> <p>As a result primarily of the concerns raised by I&APs of the safety implications related to the placement of sediment on the western bank of the lagoon, the project design has been revised after consultation with the project engineers and dredged material will not be placed directly adjacent to the western bank of the Loxton Road bridge to avoid the risk of a land bridge forming in this section during low tide (see Figure 2 on page 7 of the final BAR).</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>the revetments and could ultimately result in significant erosion of the lagoon-facing shoreline. We kindly request that these risks be sufficiently evaluated and addressed in the final dredging plan.</p> <p>In light of the above, it is essential for the Woodbridge Island community that any adopted dredging methodology adequately considers and mitigates the concerns identified under points 1 to 3. Potential mitigation measures may include the off-site storage of dredged material and the establishment of a dredged channel at a sufficient distance from the Woodbridge Island shoreline to protect both private properties and existing revetment infrastructure. To further address security concerns, we recommend that any sludge or sand embankments be positioned exclusively on the city- or road-facing side of the lagoon.</p> <p>Please keep us up-dated about any further plans dead-lines and decisions.</p>	<p>The coastal engineers responsible for project design have confirmed that the proposed dredging operation is not anticipated to have any impact on the integrity of the Woodbridge Island revetment/seawall. Hydrodynamic and sediment transport modelling, including modelling of flood conditions, was undertaken as part of the project design. Any dredge material placed on the bank, on the Woodbridge Island side, could in fact reduce erosion risk. The results of the hydrodynamic modelling show that there is no significant anticipated change to or erosion of the Woodbridge Island shoreline.</p> <p>We trust the above responses address the concerns raised on the proposed dredging application.</p>
I&AP: Pauline Potton, Secretary - Friends of Rietvlei – 05 December 2025			
P35		<p>PUBLIC PARTICIPATION APPLICATION FOR ENVIRONMENTAL AUTHORISATION: PROPOSED DREDGING OF MILNERTON LAGOON, DIEP RIVER ESTUARY, CAPE TOWN</p> <p>Kindly register Friends of Rietvlei as an Interested & Affected Party regarding the above application.</p>	<p>Friends of Rietvlei have been registered as an I&AP on the</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>Please ensure that all correspondence goes to secretary@friendsofrietvlei.co.za.</p> <p>Information on Friends of Rietvlei (FofR) as commentator/objector</p> <p>Friends of Rietvlei was established in 1988 when concerns of development in and around the broader Diep River/Rietvlei wetlands/Milnerton Lagoon/Zoarvlei areas were concerning the general public and environmental organisations. One of the objectives of the constitution is</p> <p>[e] to participate in formal planning activities in the Blaauwberg Subcouncil area where proposed or approved development may impact on the Rietvlei Conservation Area or its surrounds.</p> <p>Therefore, the current application is of interest to FofR as it has an impact on the area of interest, including the now promulgated Table Bay Nature Reserve (TBNR) and the adjacent coastal environment. This environmentally sensitive area is to be protected and conserved for greater good of the citizens of Cape Town, South Africa and globally, both now and in the future.</p> <p>Our comments on the documentation circulated on 5 November 2025 are as follows:</p> <ol style="list-style-type: none"> 1. We are in favour of the first alternative where the estuary will be re-shaped and the sediment will be placed on the sides to form mud flats. This will provide roosting areas for birds and will also reduce the amount of sediment that will need to be transported to the landfill. 2. Whilst the dredging activity as per Alternative 1 within the Milnerton Lagoon is illustrated in Figure 2 on page 6 of the DBAR, and Alternative 5 is illustrated in Figure 3 on page 7 of the DBAR, it must be noted that a site camp, work areas, and access to the dredging areas is not illustrated on any Figure. The area surrounding Milnerton Lagoon has residential areas, parks and sports facilities, roads, pedestrian walkways, and beach immediately adjacent to it. An illustration of the area required to provide the support areas for this project must be provided in the DBAR, EMPr and 	<p>Milnerton Lagoon Dredging project database.</p> <p>Information regarding the context and establishment of 'Friends of Rietvlei', and the subsequent interest in the application, is duly noted.</p> <p>Response to the comments raised by Friends of Rietvlei are provided in corresponding order below.</p> <p>Support for the preferred dredging alternative is noted.</p> <p>The location and layout of site camps and laydown areas is typically the responsibility of the appointed Contractor, where these are not accommodated within the works area itself. As such, the EMPr</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p>MMP. These support areas must not create social or environmental nuisance or damage.</p> <p>3.As identified in the EMPr, well maintained vehicles and equipment must be used to ensure there is a decreased possibility of fuel leaks and pollution, during the dredging phase. Given the use of machinery in and around the lagoon, there must be a spill prevention and response protocol included in the EMPr, which seems to currently be missing.</p> <p>4.Operations must not occur between 1 hour before dusk and 1 hour after dawn, given the prevalence of roosting birds within the lagoon and the proximity to the neighbouring residential area.</p> <p>5.Mitigation to minimize the impact on the existing fauna and flora, residential and recreational areas, must be closely monitored by the consultants and ECO during the construction phase.</p> <p>6.We note that the positive impacts of the proposed dredging are described as <i>“likely to be limited in their extent (with tidal interchange improved only in the lower lagoon) and duration (with winter flooding potentially resulting in a return to the current channel profile).”</i> Further, that <i>“Dredging is nonetheless recommended as one of the few short-term remediation options that can feasibly be implemented, alongside other</i></p>	<p>requires that the ECO to review and approve the location of site camps and laydown areas prior to implementation to ensure avoidance of sensitive environmental attributes or important recreational uses. See Section 5.3 of the EMPr (Appendix H1 to the BAR).</p> <p>The need for well maintained vehicles and equipment is acknowledged and aligns with Section 5.3 of the EMPr.</p> <p>According to the EMPr, construction works must take place within normal working hours – however, where the Contractor needs to conduct work outside of these hours, the approval of the ECO must be obtained, and surrounding land users must be informed prior to the work taking place.</p> <p>The ECO will monitor compliance with the EMPr, which includes the relevant estuarine and avifaunal specialist specific mitigation</p>

I&AP No.	Comment number	Comments/Concerns/Questions	Response by Applicant / EAP / Specialist
		<p><i>critical water quality remediation and sewage pollution abatement measures.</i>“ We have noted the limited overall impact of this intervention and emphasise that it therefore remains of utmost importance that the “<i>other critical water quality remediation and sewage pollution abatement measures</i>” proposed in the Diep River Estuarine Management Plan be implemented without delay as matters of utmost priority.</p> <p>7. Whilst it may be difficult to calculate, consideration of including a time of year/season recommended for this dredging work should be included. It is assumed that summer may be the best time, but this should be clarified.</p>	<p>measures and will address any non-compliances as they arise.</p> <p>Agreement with the explicitly outlined limitation to the benefits of the dredging proposal are acknowledged. The upstream pollution sources remain the primary cause of poor water quality and odour in the lower lagoon, and it is emphasised that upstream measures to reduce and mitigate the flow of polluted runoff into the lagoon are the most critical aspect of the City of Cape Town's response to the current situation.</p> <p>The timing of dredging will depend on procurement and contractual matters in addition to the recommendations around minimum water quality targets, and will be communicated to I&APs when confirmed. Summer has benefits in the form of lower flows, while winter offers the opportunity to achieve greater flushing.</p>

4 LIST OF APPENDICES

Appendix 1: Notifications to I&APs [redacted for privacy]

Appendix 2: Proof of media notice and site notice

Appendix 3: Proof of library letter

Appendix 4: Proof of engagement with CCT Water and Sanitation [redacted for privacy]

Appendix 5: Proof of engagement with City of Cape Town's Scientific Services [redacted for privacy]

Appendix 6: Proof of comments received [redacted for privacy]

Appendix 7: Databases of Interested and Affected Parties [redacted for privacy]

APPENDIX 2: PROOF OF MEDIA NOTICE AND SITE NOTICE

Media notification tearsheet from 05 November 2025 – *Tabletalk*

Tabletalk

67 673 copies delivered free on Wednesday to homes in Bloubaai, Table View, Milnerton, Edgemead, Souda, Helderberg, Sandvlei, Boshwood, Bloubaai Strand, Milnerton Edge, Summer Green, Melkbosstrand, Sunridge, Flamingo Vlei, West Ridge, Dugnetfontein, Van Riebeeckstrand, Sunset Beach, West Beach, Partridge, Phoenix, Sunningdale, Bloubaai Sande, Kilmory Gardens, Century City, Brooklyn Rugby.

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Letters must include the writer's full name, address and contact number. Email to yolanda.dupreez@scm.co.za

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Enough is enough

PETER SMOLIK, RUGBY

I think it's time to say to the City administration: 'Wá! There is hardly a weekend going by without some or other huge event.'

Now we just had this 'Classic' motor race on an extremely busy Kgotana Drive.

It's been poorly planned and has seriously inconvenienced probably 100,000 residents who use the affected routes to work and home daily.

The City no doubt made millions,

but won't compensate even one of the affected citizens whose travelling time will have been longer, using more fuel or paying more for taxi fare.

If it's not a marathon, it's a huge football game in the stadium, when thousands come in their cars, gridlocking the city centre for hours (Sunday, October).

I don't know what the authorities did during the WC in 2010 — I wasn't here — but I read about parking facilities to the east of the city centre and shuttle buses. If then, why not now?

Film crews hanging around everywhere, blocking

some roads even during the week, or there is a fun walk, or the Cape Town Carnival, or Beach Pro Volleyball in Camps Bay — as if that suburb isn't congested enough.

It's become almost impossible for large coaches to drive along Victoria Road at any time on any day.

The cruise ship season is here again, when up to a dozen coaches depart from the cruise terminal on the days a ship is docked.

Driving up and down Kloof Nek Road is a nightmare for the drivers, while turning into it coming from the Cableway station in Tafelberg Road is a lesson in extreme patience.

Not to forget about the CTICC hosting thousands of conference participants regularly, causing traffic along the adjacent roads to creep along at best.

Cape Town's traffic control is totally out of sync at any time in the week, the City administration is out of touch with reality, and staging such huge events is pleasuring relatively few yet causing thousands of (the rate-paying) citizens much disruption.

The time is long overdue when the number of huge events must be kept to a minimum, such as the traditional ones (Tweede Nuwe Jaar, the Two Oceans and the 'Argus').

Additional ones

should be limited to a maximum of maybe one a month, not like now when we have almost one every weekend.

The City's Mayo Member for Safety and Security, JP Smith, responded:

More than 40,000 people in Cape Town make their living through event-related work, whether as full-time professionals, contractors, or small business owners.

A recent analysis shows that just seven major sporting events hosted in the Mother City generate over R5 billion in economic activity for Cape Town.

Such limitations would threaten thousands of jobs, reduce income for local businesses, and undermine Cape Town's global standing as a leading event destination.

Events are not seasonal or occasional; they are an essential part of the city's economic and cultural heartbeat.

Cape Town is a dynamic global city, and events form part of our everyday lives. For some, events are a form of entertainment others rely on them to earn a livelihood.

They provide a recreational outlet for many and they are also spaces where we can come together as a community.

Events are woven into the social and economic fabric of Cape Town. They bring people together, showcase our city's talent and creativity, while also supporting a wide network of sectors and small businesses.

Events have become an economic driver not only for those in the business of eventing, but they are also growth catalysts for other sectors such as tourism, hospitality, retail, logistical support, production services and others.

The events ecosystem extends well beyond organisers and participants. It includes local suppliers of logistics, equipment, production, security, catering and staffing.

This demonstrates the significant multiplier effect of events, where they create business opportunities, attract visitors, and support the broader tourism and hospitality sectors.

The City of Cape Town supports events because of their demonstrated contribution to social and economic development, destination marketing and community cohesion.

Each event application is carefully assessed based on its anticipated benefits, operational readiness, and compliance with regulations.

The City of Cape Town also recognises that large-scale events

may lead to temporary disruptions such as road closures. These are managed through detailed transport management plans and traffic coordination, with clear communication to affected communities to minimise inconvenience. The benefits, however, far outweigh the short-term impacts.

Events reflect Cape Town's energy, diversity and ambition. They create shared experiences, attract investment, and strengthen the city's position as a premier global destination for culture, sport and innovation.

Limiting them would not only stifle economic opportunity but also diminish the very vibrancy that defines Cape Town.

Setting the record straight

GLENDIA PONTES, MILNERTON

Thank you, *Tabletalk*, for reporting on the article regarding the Milnerton CPF special meeting with the insight and truth it deserves ("Tensions flare at Milnerton CPF election meeting," Wednesday, October 29, *Tabletalk*).

Continued on page 8

Sudoku No 147; Level: Tricky

How to play: Fill every column, row and 3x3 box so they contain every number between 1 and 9.

Solution on page 8

9	7			2				
		6	1	3				
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					7	3		
3	5	2						
	4			1	9			

Mekor Vehicle CLEARANCE CENTRE

Year	Make	model	Colour	KM	Price
2004	RENAULT	MEGANE II 2.0 PRIVILEGE	BLACK	232090	R39,900
2008	HYUNDAI	TUCSON 2.0 GLS	GREY	166073	R69,995
2005	NISSAN	MICRA 1.4 ELEGANCE (D61)	BLUE	187429	R69,995
2005	VOLVO	S40 2.4i A/T	SILVER	237502	R79,900
2007	LAND ROVER	FREELANDER II 3.2 6 SE A/T	BLUE	146500	R89,900
2011	VOLKSWAGEN	Polo Vivo 1.4 TRENDLINE TIP FR-V 1.8i A/T	SILVER	237343	R89,900
2008	HONDA	FR-V 1.8i A/T	SILVER	235957	R89,995
2005	VOLKSWAGEN	POLO 1.6 COMFORTLINE	BLACK	251066	R89,995
2006	TOYOTA	VERSO 180 TX	SILVER	230160	R99,995
2014	MINI	MIRAGE 1.2 GLS	WHITE	99001	R109,900
2008	TOYOTA	COROLLA 1.6 PROFESSIONAL	WHITE	184265	R109,995
2011	FORD	FIESTA 1.4i AMBEANTE 5 DR	WHITE	199999	R109,995
2010	HONDA	JAZZ 1.5i EX-S	WHITE	211267	R114,995
2016	HYUNDAI	I70 GRAND I70 1.2S MOTION GO + 1.2 (7 SEAT)	White	108111	\$119,995
2017	DAEWOO	MOBILO 1.5 COMFORT	GREY	122475	R119,995
2015	HONDA	MOBILO 1.5 COMFORT	WHITE	315017	R119,995
2015	FORD	FIGO 1.4 TDCI AMBEANTE	NAVY BLUE	110389	R119,995
2018	RENAULT	SANDERO 900X STEPWAY BY MANIQUE	WHITE	190735	R119,995

MEKOR Pod 2 Canal Walk Shopping Centre Milnerton 7441 (021) 001 1714

NOTIFICATION OF PUBLIC PARTICIPATION PROCESS

Basic Assessment
Proposed Dredging of the Milnerton Lagoon in the Diep River Estuary, Cape Town, Western Cape

The City of Cape Town, Environmental Management Department: Biodiversity Management Branch, proposes dredging the lower reaches of the Milnerton Lagoon to reshape the channel profile and enhance tidal exchange.

Application has been made to the Department of Environmental Affairs and Development Planning for an Environmental Authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment Regulations of 2014, as amended, to undertake the following listed activities:

- Using Notice 1 (GN327 of 2017), as amended: Activity 15 and 19A
- Using Notice 3 (GNR 324 of 2017), as amended: Activity 14

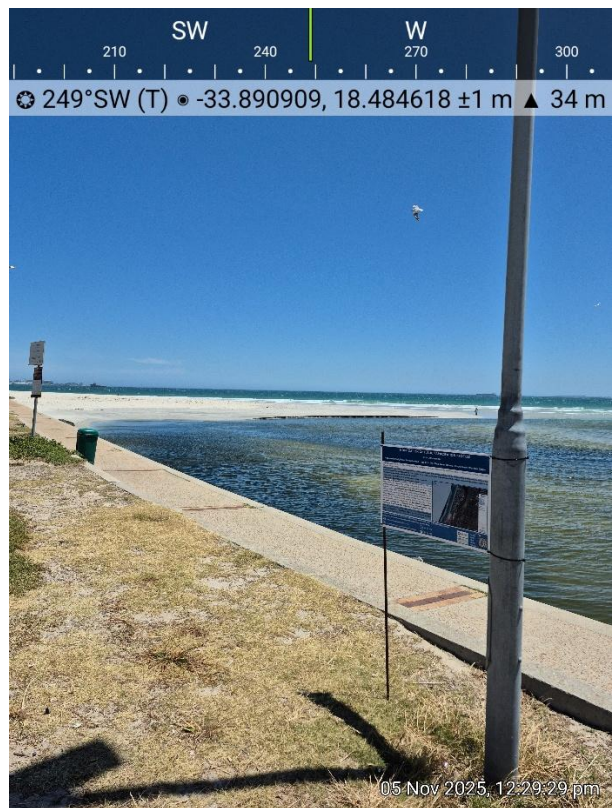
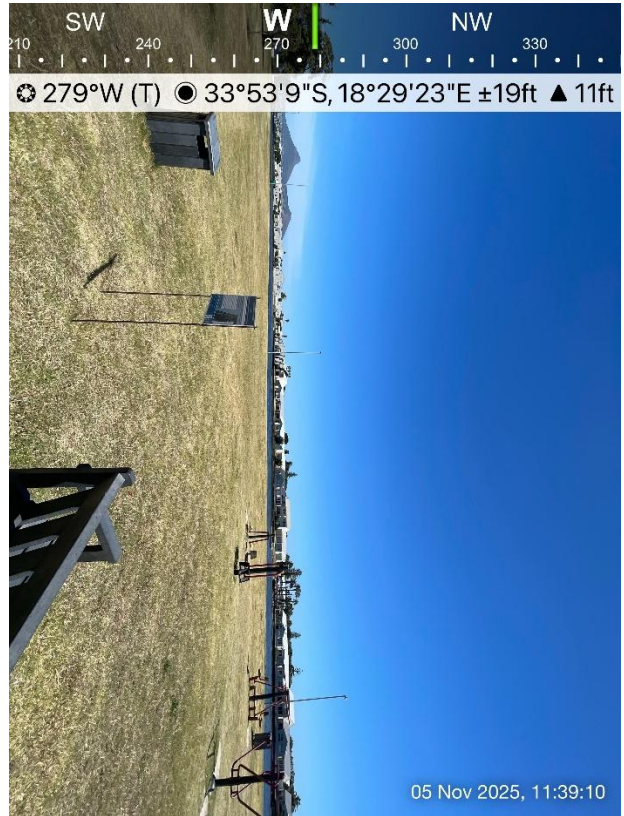
Opportunity to participate: Interested and affected parties (I&APs) are hereby invited to register and provide comments on the Draft Basic Assessment Report (BAR) and its associated appendices, which are made available at www.infinitivenv.co.za/milnertonlagoondredging, the Milnerton Public Library (Pienaar Street, Milnerton) or on request from the Environmental Assessment Practitioner of the details indicated below. When registering or commenting, please provide your name, contact details, and an indication of any business, financial, personal or other interest you may have in the application. The Draft BAR and its appendices are made available for a minimum 30-day comment period from Wednesday, 05 November 2025 until Friday, 05 December 2025.

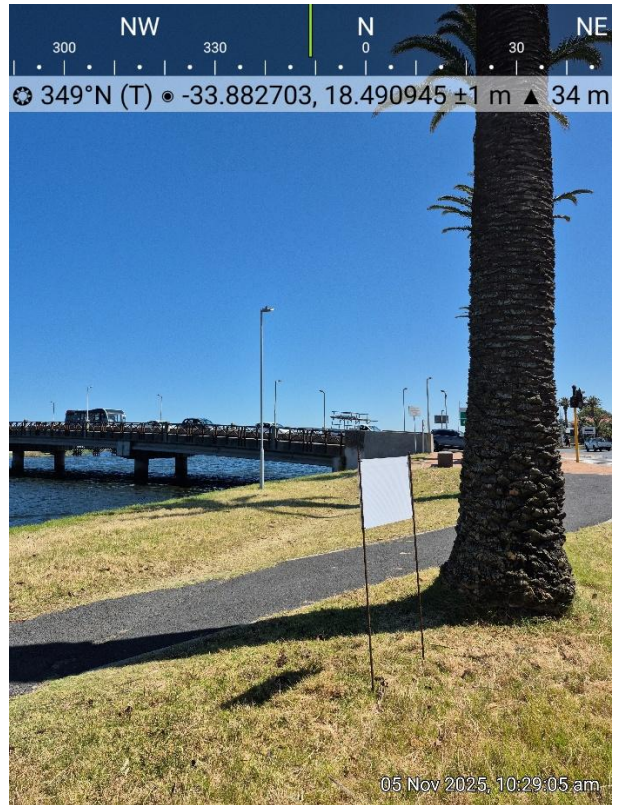
I&APs are also invited to a Public Open House at the Billion Club of Cape Town (14 Donegal Street, Rugby, Cape Town, 7405) on Wednesday, 19 November 2025 at any time between 14h00 to 19h00 to learn more about the application and/or provide input.

For more information, to comment, or to arrange alternative ways of participating, please contact the Environmental Assessment Practitioner, Jeremy Rose at:

jrose@redridgeinfinitivenv.co.za 042 634 7676
www.infinitivenv.co.za/infinitivenv 021 634 1400

Site notices placed on 05 November 2025





APPENDIX 3: PROOF OF LIBRARY LETTER

Dropped off at the Milnerton Public Library



E info@infinityenv.co.za
T | F +27 (0) 21 834 1602 | +27 (0) 86 591 8616
P Suite #17, Private Bag X11, Mowbray 7705
A Collingwood Building, Block River Park
Fir Street, Observatory, Cape Town 7925

06 November 2025

Milnerton Public Library
81 Pienaar Road, Milnerton
Western Cape
7435

RE: PROPOSED DREDGING OF THE MILNERTON LAGOON IN THE DIEP RIVER ESTUARY, CAPE TOWN

Dear Librarian,

The Draft Basic Assessment Report (DBAR) and its associated appendices for the proposed Dredging of the Milnerton Lagoon in the Diep River Estuary, is the subject of this notification. Please ensure that the DBAR and its appendices (enclosed with this letter) are made available from Thursday, 06 November 2025 until Friday, 05 December 2025.

Comments and registration requests may be submitted to Infinity Environmental for the attention of Jeremy Rose or Tayla Hobson using any of the following methods:

- Online using the form at www.infinityenv.co.za/public/milnertondredging
- By email: milnertondredging@infinityenv.co.za
- By post: Suite 17, Private Bag X11, Mowbray 7705
- Telephonically: 021 834 1602
- Whatsapp: 060 524 7676

Kindly direct members of the public who may require further information or wish to comment or register as an interested and affected party, to the contact information below.

Tayla Hobson
Infinity Environmental

Email: milnertondredging@infinityenv.co.za

Tel: 021 834 1602

WhatsApp: 060 524 7676

Website: www.infinityenv.co.za/public/milnertonlagoondredging

Sincerely,

A handwritten signature in black ink, appearing to read 'Tayla'.

Tayla Hobson
Infinity Environmental (Pty) Ltd.

A handwritten signature in black ink, appearing to read 'Thembela Dike'.

Thembela Dike
06.11.2025.

Infinity Environmental (Pty) Ltd. | 2016/229213/07
VAT Reg. 4280277445
Directors: T.P. Solomon, J.T. Rose