



CES External Memo

DATE	17 December 2024
TO:	KSDNA Various stakeholders
FROM	Dr Ted Avis

KENTON DUNE PROJECT – RESPONSES TO KOSRA DECEMBER 2024 NEWSLETTER

Background

The newsletter regarding the Kenton Dune project issued on 4 December by KOSRA contains many incorrect facts and unjustified assertions that require responses and clarifications.

KOSRA COMMENT	CES RESPONSE
Fanie Fouche informed us mid-year that the MMP was halted by Dedeat until August 2025 when it would come up for review anyway.	Clearly there is a misunderstanding here as the approved Dune Management and Maintenance Plan (DMMP) was not halted. DEDEAT cannot revoke an approved environmental authorization unless there is non-compliance with the conditions once construction starts. They requested a second opinion on the potential for the estuary to migrate further eastwards prior to them approving the Construction EMP (Environmental Management Plan). This was a pursuant to the 70-metre eastward movement at the mouth during the storm events of 2023. Since that time the estuary has only moved 8 metres in the past year, negating the need for an external opinion as it appears stable and within the natural fluctuations of these systems.
After repeated attempts were made, a meeting was held with the Ndlambe Directorate and Warren Lange during which we were told the plan was approved and was going ahead	An environmental authorization was issued by DEDEAT three years ago, and this approval remains in place. A condition of that approval was the requirement to provide a detailed Construction EMP and Method Statement in accordance with the specifications provided in the DMMP. This was provided to DEDEAT in late 2022 and was approved early the following year (2023). The only outstanding approvals were a Council Resolution and the signing of an MOU between Ndlambe and KSDNA.
In the long run, what in fact would happen was that a permanent wall/dune would be artificially erected which would stop all the natural movement of sand flowing naturally westward	It is disingenuous to liken a vegetated dune system to a wall as this is a natural feature along our entire coastline. Frequently unvegetated dunes naturally vegetate as has been seen in the study area. Currently small dunes close to the river mouth are being vegetated with pioneer species and under the right conditions (good rains and periods of lower wind) the area could vegetate naturally.
The meeting was called by the Municipal Manager with representatives from other organizations as well as Mr. Robert Rose and Ted Avis from CES.	Dr Ted Avis was invited to attend as an expert in coastal dune ecology and Mr. Robert rose attended in his capacity as chairman of the Kenton Sand Dune and Nature Association(KSDNA).

<p>When we enquired why the latter two participants were invited, as individuals, to share their personal agendas when the MMP was only to safeguard Municipal property, we were told by the Municipal Manager that it was not a KSDNA plan but a Ndlambe plan and that KSDNA was going to pay for the implementation of the project for a period of three years.</p>	<p>The proposed solution prepared by CES has been submitted to the municipality and the competent competent authority and approved. As the implementing agent the municipality adopts the proposed solution.</p>	
<p>We learned for the first time that there was a new proposal on the table.</p> <p>Warren Lange undertook to provide this and sent three documents prepared by CES:</p> <ul style="list-style-type: none"> • A Construction Environmental Management Program dated June 2022, which is informed by the original MMP dated 2019 and the rehabilitation plan commissioned by KSNDA in April 2020 (known as Robert Rose’s plan); • A Maintenance Management Plan Construction Method Statement prepared in December 2021 and revised in June 2022; • A PowerPoint presentation for DEDEAT which is dated October 2023. 	<p>There is no new proposal on the table. The three documents listed here were prepared to meet the conditions of the environmental authorization, as well as to meet the requirements of the approved DMMP.</p> <ul style="list-style-type: none"> • The Construction EMP provides detailed specifications on how the environmental impacts of construction, as well as safety and health aspects will be managed for the construction period. • The Method Statement provides further details and specifications on the implementation of the project. • The PowerPoint presentation was a summary of the above prepared by Warren Lange for his meeting with the competent authority. 	
<p>This supports our notion that we have been excluded from private discussions between Ndlambe and CES yet Warren Lange had strongly denied in our meeting on the 12th of November 2024, that there had been any official meeting between himself or Ndlambe with CES and that there had only been casual interactions.</p>	<p>There have been no private discussions between Ndlambe and CES, although there have been private discussions between the municipality and KOSRA/EC. There have been ad hoc professional discussions between Ted Avis and Warren Lange to discuss scientific aspects of the project.</p>	
<p>It would be remiss of us to not highlight the fact that the municipality would be committing to spend far in excess of a R1mil PA, at today’s cost, using Ratepayer’s money to maintain a system that will continue to fight the forces of nature.</p>	<p>The removal of sand will not cost anywhere near the purported R1m. A scientifically based estimate of the 3000 m³ of sand accumulating in the area was based on a 3-dimensional sediment model of the estuary undertaken by PRDW. The information presented in the proposed solution is based on scientifically credible work. Whatever the cost may be if there are 1500 rate payers and their rates per month were to increase by R30 per month, this would yield R540,000 and at R40 per month Rand 720,000.</p>	
<p>There is misrepresentation in that the CES report makes no mention that an EIA would be required to distribute the sand at Middle Beach. That area does not fall within the authority of the current MMP.</p>	<p>An EIA will not be required to distribute sand at middle beach. Engagement with the oceans and coast department of the DFFE took place in 20 22 and it was determined that an ORV permit will be required from them to deposit the sand at Middle Beach.</p>	
<p>The sand will be deposited on a pristine beach between two highly prized blue flag beaches. The question is; Has the full extent of the depositing 6000m3 been assessed? Will it affect fishing and or the launching of recreational fishing boats?</p>	<p>Two areas have been identified for depositing the sand. a) In front of the carpark b) beyond the rocks and the boat launching. This will be done at off peak periods and with discussion with the boating community. The amount of sand to be deposited isa very small percentage of the sand presently deposited by the sea. The movement of sand is very volatile in this area due to the nature of the rock formations. This would be well below 5% presently deposited in this area which will not cause problems.</p>	

CES Environmental and Social Advisory Services

<p>Within the estuary: It would be criminal if we did not warn the Municipality of the hard fact that if the proposal is carried out, it will add many thousands of cubic meters of sand to continue to accumulate up-river to the point when this jewel of the South African coast could become a blind river. This will be due to sea surges that are becoming regular occurrences, which will continue to scour the east bank of the river and deposit the sand up the river.</p>	<p>The logic behind this statement is very difficult to follow. As noted above, relatively small volumes of sand will need to be moved to Middle Beach, and the thinking is that this might not even have to be done quarterly. We do not understand how “thousands of cubic metres of sand will continue to accumulate upriver”, as the edge of the dune will be situated 70 metres behind the current spring high tide mark (SHTM). Interestingly the naturally vegetated dunes immediately adjacent to and up river are presently at the SHTM and present a greater risk of sand entering the estuary during natural erosion events than the recontoured dune does.</p>	
<p>No consultation has been entered into with Lands’ End property owner of the possibility of turning their one-car wide, current cul-de-sac into a two-way haul road.</p>	<p>The extension of Lands End Road with a sand path only used for the sand dumpers was only considered as a possible option when there were many complaints that Westbourne Road was not fit for purpose. Since this road has been brought up to standard and all other roads are suitable, the 2.45 Km Westbourne road will be used.</p>	
<p>Has CES or Ndlambe been permitted to make a road through a pristine wooded valley with protected milkwood trees and within a proclaimed nature reserve? Has anyone considered the effect on residents with heavy haul trucks passing their houses every few minutes? They would surely seek relief through the courts.</p>	<p>No heavy trucks or a need for a two-way highway was ever a requirement for Lands End Road. .</p>	
<p>Have civil engineers given the municipality any idea what the lifespan of the roads will be with 2000 passes of trucks every year?</p>	<p>Based on the predicted 3000 m³ sand accumulation per year at the dune, the intention is to transport 1500 m³ in 2 operations each. Year. The Thwaites 9t dumper carries will be used from beach to beach and the route is 2.45km. It is estimated that this can be completed in two periods of 2 weeks. There will be no damage to the roads greater than current transport.</p>	
<p>Holidaymakers will not enjoy the noise, dust and disturbance of machinery operating at the mouth of Bushmans River Beach for 3 to 4 months a year.</p>	<p>Any maintenance requirements and removal of sand will take place during off-peak periods when most non-permanent residents are not in Kenton. Based on 3,000m³ it is estimated this can be moved in two periods of two weeks. So should quantities be double this, this would most likely be done every quarter rather than bi-annually. There will be no noise for holiday makers and hardly any noise for permanent residents..</p>	
<p>Nor will they enjoy the bulldozer that will be constantly levelling the offloaded sand on the most used beach in Kenton.</p>	<p>There will be no bulldozer constantly levelling off the offloaded sand. It is expected that this will not be required at Middle Beach as the sand could be deposited below the high water mark and simply reworked by wave action during the next high tide. It is an unnecessary expense to level the sand being deposited at Middle Beach</p>	
<p>Has anyone considered the noise pollution of noisy loaders loading noisy dump trucks within meters of the Bushman’s water’s edge?</p>	<p>This has been considered and as noted the inconvenience will be minimal for at the most two months per annum and at off-peak periods.</p>	
<p>These dump trucks would then have to haul their load up a steep incline over the dune and deposit it at a staging station 6m from in front of front-row residential homes.</p>	<p>There will be no steep incline as a narrow track will be engineered as part of the dune recontouring. This would also serve as a very suitable pedestrian access point to the river mouth. An access boom will be constructed at the entrance to avoid private vehicles taking joyrides over the dune or towards the river mouth</p>	

<p>A thousand loads of sand with heavily laden trucks passing over public roads every year will entail incalculable costs to Ndlambe, year after year, forever.</p>	<p>There will be no heavy trucks in use whatever. As the amount of sand to be transported is dependent on natural erosion and deposition events it might vary year-on-year. In some years it might be more and in other years it might be less.</p>
<p>While CES claim only 3000 m3 of sand will need to be removed annually is exactly half of my calculations taken as an average over a 30-year period. This is minute compared to the quantity PRDW estimated in their scientific study submitted on Page 5 of Kenton-on-Sea Dune Encroachment Study (S2001-39 R0 2015-10-30X7.docx PRDW) and depicted in the picture below. This is taken from their 2015 report to Robert Rose.</p>	<p>This is based on scientifically credible work, and we have had no sight of any other calculations nor any other scientific information that contradicts this calculation. We do not know what this calculation is based on. However, should volumes in the future be much greater, we do not see any difficulty in managing this and this is a reality the community will understand. Reference to the figure in the PRDW report is a misunderstanding as this simply highlights the anticipated volumes of sand that are moved by longshore drift compared to aeolian or windblown sand transport. It is not relevant to the situation.</p>
<p>Wind-blown sand/dust: No cognizance is taken of the nuisance value of sand and dust being distributed with trucks driving through town or where sand is being loaded and offloaded on the beach. No consideration is taken for all other folks.</p>	<p>There is no dust as sand particles are larger than dust and would only blow in very strong winds as we all know. The vehicles to be used have load bins (with no open tailgate) and the risk of sand being blown or bounced out of these vehicles is minimal and will be minimised further by ensuring that they are not overloaded.</p>
<p>Never has a sandy beach been improved by adding shade nets and branches, either as a recreational area or has the beach been visually improved.</p>	<p>This is an incorrect statement as sand nets have been used extensively to stabilise mobile sand if the situation requires it. For example, at Big Bay, Hout bay and Blouberg in Cape Town. In all situations the City of Cape Town identified the need for the stabilization programs, recognizing the need to manage mobile sands in altered dune systems to the benefit of recreational users and homeowners.</p>
<p>The proposal will not give better access to the beach.</p>	<p>The proposed solution will definitely provide improved access to both the mouth of the river as well as Shelly Beach as pathways have been incorporated into the design.</p>
<ul style="list-style-type: none"> • The introduction of no-go areas is not acceptable on a public beach. 	<p>No-go areas are only required during the bulk earthworks phase of the project which is likely to take less than six weeks. People will be discouraged from walking on the revegetated dune by providing more adequate footpaths and by providing informative signage to explain the sensitivities of vegetated dune systems to human trampling</p>
<ul style="list-style-type: none"> • There are no guarantees that Ndlambe will remove the accumulating sand forever, and neither will Mr. Rose provide such guarantees. 	<p>The river and its environs will need to be professionally managed in the future by the appropriate authority and it will then be managed in the most cost efficient way. The additional costs to ratepayers will be less than 1%.</p>