



CES External Memo

DATE	19 December 2024
TO:	KSDNA Various stakeholders
FROM	Dr Ted Avis

KENTON DUNE PROJECT – RESPONSES TO ERRONEOUS STATEMENTS IN THE PETITION

STATEMENTS FROM THE PETITION	CES RESPONSE
<p>What was the cause of the By-pass to stop working?</p> <p>To protect structures, branches were placed on the beach at the mouth of DBV and later placed almost to the mouth by Kenton Municipality. This was done over 30 years starting in the mid-1940s and finally stopping in the 1970s.</p>	<p>There is no indication on the 1942 and 1955 aerial photographs that a concerted revegetation program was implemented. However there is anecdotal evidence that brushwood and seeding of exotic species was undertaken to sustain stabilizing the area.</p>
<p>The result:</p> <p>By the 1970s, all natural movement of sand was permanently blocked by the vegetation allowed to grow from the Port Jackson and Rooi Kranz seed pods. This vegetated dune grew in height and eventually extended to the river mouth. This process finally reversed when the sand started naturally rolling back on itself as a sandy dune. This process is still continuing as nature reverts to its natural state.</p>	<p>The vegetation would have been a contributing factor to preventing sand moving through the headland by-pass system. However, the most significant factor was the construction of Middle Beach Road and the raised parking area at middle beach. The ground level at the eastern extent of Dry Bones valley is approximately 5 to 8 meters below a Dune Ridge located at this end.</p>
<p>The Ndlambe/KSDNA/CES plan (in brief):</p> <p>* Other Issues: They plan to use small dump trucks to transport the accumulating sand from the Estuary side of the dune over a woodchip road running to the end of Westbourne Road. The CES report states 3 000m³ will need to be moved</p>	<p>The original desktop report dated 2015 estimated 15000m³ but without any investigation. When this was done this proved to be inaccurate. The full investigation was undertaken including modelling of sediment flows in the estuary. This indicated that approximately 3000 m³ off sand accumulates at the mouth of the system.</p>

<p>per annum whereas previous studies state 15000 m³ of sand feeds the dune per annum.</p>		
<p>* This sand is to be stock-piled in a staging area at the end of Westbourne Road, opposite the road, in front of residential homes. It will once again be loaded onto bigger trucks and transported either through Lands End Road or via the fragile road network through Kenton and deposited on Middle Beach. No EIA has been undertaken to see if dumping of this sand at Middle Beach is environmentally acceptable.</p>	<p>There will be no need to stockpile sand at the staging area as sand will be loaded directly onto 9T dumpers at the seaward edge of the dune and transported directly to Middle Beach.</p>	
<p>* No consideration as to the effect the excess sand has on an estuary that is being choked by the net gain of sand entering annually. It exposes the Estuary to the ever-increasing risk of becoming blocked and closing, especially if Ndlambe falls short in its service delivery.</p>	<p>There will be no excess sand on the estuary as the intention is to remove sand as and when it accumulates on the 70-meter-wide beach area created in front of the dune. The cost of this has been discussed previously.</p>	
<p>Save the Bushmans Estuary group (SBE group) proposal:</p> <p>The SBE group proposal is to restore the natural movement of sand, part of which would be to restore DBV as a sand conduit to remove as much sand as possible from the choking estuary. We know that it will need to be managed from time to time, especially to minimise the nuisance of windblown dust affecting Lands End property owners. To do this it would mean</p>		
<p>To transport an immediate 50 000m³ of sand from the dune by large dump trucks through DBV over a two-month period where it would fill the natural hollows adjacent to Middle Beach Car Park. This would lower the current dune height and relieve the estuary of some of the excess sand that is choking it. This would also restore the view of the river mouth for Lands End residents.</p>	<p>This proposal and the various other aspects covered in the petition has been examined by two coastal engineering firms (Aurecon and PRDW). This was rejected as the costs related to all the various aspects of removing vegetation extensively, and the many other operations and ongoing maintenance, was many times greater than the final approved PRDW/CES proposal both in the short term and the long term. What is also evident is that the risks of success were great, and it provided no long term solution.</p>	

	The risk of obtaining DEDEAT approval were great and hence there was no merit in further investigating this option.
<p>* To lay a one-meter-deep layer of sand on the valley floor. This body of sand would then feed the Middle Beach at a steady rate over time as the sand is constantly being fed from the Bushmans estuary. When maintained as a flat surface, there will be minimal airborne sand.</p>	
<p>See Future Maintenance</p> <p>* The sand within DBV would need to be kept with a flat surface. With the hindering of dune formation, it would stop sand from becoming airborne and so become a nuisance to residents along Lands End Road.</p>	See above
<p>* From time to time excess sand that will form west of the car park would need to be bulldozed the short distance onto the beach. This will restore the constant flow of sand onto the beach as happened before the Middle Beach Car Park was built.</p>	See above
<p>Besides the inconveniences already mentioned, will you allow: No-go bunting to be placed on the beach that will keep you out of the area, including access to Jacobs ladder or probably access to a walk through DBV for months at a time, every year, forever,</p>	This is misinformation. There will only be no go areas during the brief construction phase when the dune is reconfigured and, in those areas, where the new vegetation is required to stabilize the dunes. There will be access to DBV and Shelley Beach once the reprofiling is complete. These are required for safety reasons.
<p>* Them to dump sand somewhere at Middle Beach, again with a yellow bulldozer operating nonstop while the trucks are riding and this is between two Blue Flag beaches and on a stretch of beach that is constantly used by walkers</p>	There is no need for a bulldozer to level the sand on Middle Beach
<p>Them to even start where an environmental study has not been conducted on the deposit site.</p>	<p>There's no requirement for an environmental study and all approvals are in place, save for engagement with DFFE Oceans & Coasts regarding an ORV license.</p> <p>There would definitely be the need for an EIA as well as technical studies to investigate the viability of the option presented in the petition. The</p>

	<p>significant risk is that it will not be approved because of the existing condition related of minimizing damage to the vegetation. Engagement with DEDEAT would be wise.</p>	
<p>LASTLY, IF YOU ARE A PROPERTY OWNER, WILL YOU ALLOW THE MUNICIPALITY TO SPEND OVER R1MIL PER ANNUM OF TAX PAYER'S MONEY, PLUS INFLATION, ON THIS ILL-CONCEIVED PLAN, KNOWING IT WILL LAST FOREVER? THERE HAVE BEEN SCIENTIFIC STUDIES DONE THAT CONFIRM THAT THERE IS A NATURAL COURSE OF ACTION THAT ALLOWS A BIG PERCENTAGE OF THE SAND TO MOVE AT MINIMAL COST AND MINIMUM INCONVENIENCE TO EVERYONE.</p>	<p>The costs for the many aspects of the schemes proposed in the petition will be many times greater and have a high risk of failure. Furthermore, they provide no long-term solution. This has been examined by two firms of coastal engineers and completely rejected as it is neither cost effective and provides no solution to the sand management or the protection of the nature reserve. The proposals in this petition fail on every count.</p>	