

BUSHMAN'S RIVER MOUTH / BOESMANSRIVERMOND



Ratepayers' Association / Belastingbetalersvereniging Ward 3 / Wyk 3
P.O.Box 50, Boesmansrivermond, 6190.

30th May, 2006

The Municipal Manager
P O Box 13
Port Alfred
6170

Re-Comments on Spatial Development Framework Plan Bushmans River Mouth/Marcelle/Klipfontein/Kenton/Ekuphumleni

Dear Sir,

The document as a whole is much improved on the draft of 2005. The devil is in the detail and there are several errors/omissions in the document dated March, 2006. Firstly we will deal with the broader aspects and then to detail and error/omission in the document in its present form.

Broader Aspects

It is understood that the SDF is the basis and is integral to the IDP. It is noted that the urban boundary is extended both to the east and the west when compared to the previous 2005 draft document. There is however no provision for further or future needs in terms of public facilities/ open space/recreational facilities.

It needs to be understood that with an expanded Urban perimeter there will be further development of housing, whether it be high density or low density, which will add pressure on the already inadequate existing facilities and resources. The rivers (Bushmans and Kariega) are finite and are deteriorating rapidly after sustained exploitation, siltation, lack of freshwater inflow and no proportional increase in recreational facilities or control.

The whole area is a recreational residential tourism area and it is this which is the main driver of the economy and sustainability of the region. That is to say without supporting this "industry" the whole area would collapse economically. It is the rivers, beaches and natural surroundings which attract the people, hence the housing, boating, building and support services which is the mainstay of the economy.

The main argument is that the SDF makes no attempt to expand or allow for more or expanded facilities in terms of parking, open space, recreational facilities, access to rivers or beaches, solid waste disposal sites, sewerage works or water aquifer development and storage. In fact the document does not even show the existing access road and inadequate parking at the Bushman's River Mouth beach or the picnic facility. These are exceptionally important parts of the infrastructure in the light of the development and planning of the area with reference to sustainability.

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The Joan Muirhead Local Nature Reserve and expanded Joan Muirhead Nature Reserve is not correctly marked. The Eric Pudney Nature Reserve on the west bank of the Kariega River is not recorded on the map nor is the Shelly Bay erf owned by the Bushmans Kariega Trust. On the broader map MAP 7, Kariega Park, Kwe Kwe and Sibuya Game Parks/Reserves are not shown.

There does not appear to be enough thought and vision in the SDF and it is more of a document to establish what is where, rather than a future planning visionary document. All areas need to be allocated to specific purposes or potential specifics rather than just "open space" or vacant land for general development.

Detailed Aspects

A) Access Points

One of the most important aspects of the SDF in the context of planning should be public access. The Government White Paper on Sustainable Coastal Development states that there must be as much access for all in terms of roads and paths to the sea and rivers as possible.

All of the points below should be included in the SDF and as per the Government White Paper on Sustainable Coastal Development, there should be as much access for all to the coast. The road access to Kariega Main Beach and Bushmans Main Sea Beach are not even marked on the map. Public access points to the rivers are not marked. It is critical that these be included in the SDF and clearly indicated as Ndlambe has sold two of the public access paths to the Bushman's River in the past year. This is most controversial and could be construed as illegal in terms of proposed Government Legislation. At Kenton a public path is now part of a driveway to a private residence. It was a public pathway not a private driveway. These paths and access points need to be distinctly marked and mapped so that there is no confusion as to the rights of the public at large. This should not be compromised. There should be more not less public access. Plans for access to the sea should for the residents of Klipfontein and Marselle also be made and better public access to Diaz Cross which is an important National Monument and tourist magnet. There is no public access path to the Kariega River for the residents of Ekuphumleni.

In terms of Law there is a prescriptive right to access to the sea at the Bushmans River Mouth in as much as this road has been used by the public for over 40 years irrespective of what SanParks position on the area is.

B) Open Space

There is no indication of planned public open space within the urban area. What ratio of open space to development is an ideal in new developments? We cannot afford to have rows and rows of houses without some public open space within the urban envelope. It cannot only be the water courses that are left as open space. There is no indicated open space along the Kariega River east bank above the R72 bridge in the extended urban envelope.

A most critical area is the area between the access road to the Bushman's River Beach and the river. There are existing ablution facilities and a picnic area. The Albany Coast Water Board also has several well points in this area. This area is recreational now and should be recorded as such irrespective of ownership.

Included in open space should be planned and possibly expanded parking areas. This includes all of the beach car parks, Kariega Main Beach, Kenton Middle Beach, Kenton River car park and Bushmans Sea beach. All river car parks including Bushmans River slipway, Rivers Bend slipway, Kenton Bushmans River car park, Kariega slipway car park and the Kenton Marina Car Park. Possibly, addition area should be made available as a car park to access Diaz Cross, while the beach car park close to Marselle and Klipfontein, which was , has now fallen into disrepair.

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The SDF does not stipulate the plans for public open space which is indicated on the maps e.g. the area which was the borrow pit for the construction of the bridge over the Bushmans River (between the R72 and Merry Hill. This is only marked as open space. It should be given an allocation or potential allocation eg recreation playing fields, so as to make it distinct from a potential garage site, shopping centre or some other allocation. To allow this site to be a temporary building rubble fill site as it was would achieve to goals at once. All public open spaces should have allocations or potential allocations planned and assigned to them so as to prevent confusion in the future.

C) Aquifer.

Water is considered as the primary priority 1 in the Ndlambe Municipality yet there is no indication in the SDF for development of the identified aquifers or potential aquifers. A case in point is the Diaz Cross aquifer which supplies half or the water supply to the region. Further development of this aquifer is critical to the development and sustainability of the area as a whole. The aquifer behind the foredune between Bushman's River and Diaz Cross is a potential supply of second grade water which could be up graded at a relatively low cost when compared with treating raw sea water supplying the area needs to be conserved so that there is a sustainable supply of water for the area. There is dispute with SanParks which is detrimental to the development of the area.

The aquifers need to be protected from housing development, potential pollution and agriculture. This includes the "vlei" area and Klip River at Bushman's. The area between the Bushman's River Mouth and half way to Kwaaihoek is under the jurisdiction of the Ndlambe and not S.A.National Parks. It should remain a conservation area and the area immediately in front (seaside) of the foredune is zoned as part of the Albany Coast Water Board. It is not zoned as such in the SDF nor is the pipeline from Diaz Cross to the ACWB to which the ACWB has title. The areas surrounding the Klip River should be zoned as a green belt. Gardens are being developed in this area on steep slopes on the banks of the river which is going to result in chocking of the river and erosion of the banks to the detriment of the aquifer.

C) Developments.

No permanent developments (housing, hotels, motels, holiday accommodation or apartments) should be allowed in the zones around the water courses (perennial and tidal) or on any of the steep banks leading to the river. This is documented in the SDF as 1:100 year flood line, 1:6 slopes, below 10m amsl and within 30m of the high tide mark. It is essential that these zones are marked as such on the SDF maps so as to prevent confusion or potential confusion when developers approach the Ndlambe Municipality to develop certain tracks of land. Another consideration should be the moratorium on development within 1 kilometre of the high tide mark (river and sea) as indicated in the Government White Paper on Sustainable Coastal Development.

Areas for potential high density, medium density, low density and eco type housing, commercial property, open space and institutional property should be identified in all "open" or vacant land. Definitions of these should not only be density of dwellings per Ha but should go further to give ratios of open space, commercial, institutional, recreational and access frequency. This will be particularly important in the extended urban perimeter to the east and the west of the node. Heights of building need to be stipulated i.e. 6.5m from the median height amsl of the erf. This has caused problems in the past and will do so in the future if not stipulated.

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Ndlambe Municipality need to have the area flown using high resolution colour, aerial photography survey which would allow accurate analysis of the ground and record a point in time for future reference and future development in a meaningful way.

The area to the south of the Bushman's industrial area is incorrectly identified as a multi-storey building area. No area should be identified as a multi-storey building area as this would be out of character for the area as a whole. Yes, there are some townhouses there but it took years for them to be sold or occupied. Please do not confuse the issue by saying multi-storey when what is meant is townhouses.

D) Waste Disposal

Waste disposal, both in terms of solid waste, sewerage disposal and to degree storm water drainage, needs to be carefully planned and provided for in the long term in the SDF. Existing sites are both unlicensed and in some cases poorly sited i.e. too close to urban development.

There does not appear to be provision in the SDF for long term solid waste disposal. This has caused considerable problems in other municipalities and has caused great unnecessary expense.

Sewerage disposal and treatment is also problematic in terms of SDF because if there is inadequate provision for extended works at Bushman's River in terms of, reticulation, bulk conservancy tanks and pump stations etc, it also leads to unnecessary expenditure. A case in point is in the Kenton area where the siting of a pump station has been controversial and led to wasteful expenditure. The position of the Kenton sewerage works within Ekuphumleni is also problematic and needs to be moved to a more suitable site. The siting of this infrastructure needs to be planned within the SDF at an early stage so as to avoid complications later.

An important part of the SDF is planned infrastructure or potential necessary infrastructure. There is a problem with sewerage from poorly planned conservancy tanks and old French drains causing sewerage to leak into the Bushman's and Kariega Rivers. These matters need to be provided for in the SDF.

E) Errors and omissions in SDF Document

- 1) Klipfontein needs to be included in Map 3.
- 2) Klipfontein erven are not marked and neither is any of the infrastructure on Map 17, 18, 19 and 20. Klipfontein appears to be ignored.
- 3) Roads to Bushmans Beach, Kenton (Bushmans River) car park extension of River Road., Kareiga Main Beach road.
- 4) Erf at Shelly Bay. Map 18
- 5) Car Park at Bushmans Sea Beach map 17 and picnic area
- 6) Joan Muirhead boundaries on Map 19
- 7) Eric Pudney Reserve Map 19 is not marked/mapped at all or referred to or identified on page 70 under open space. It is open space and has a function.
- 8) Public open space/access to rivers.
- 9) Page 34 should read "amsl" and not "msl" and "1:100 year flood line" not "1:100 flood line".
- 10) There is inconsistency because slope is referred to 1:5 on page 33 and 1:6 in other sections. Also reference to high water mark is 30m in some places and on page 34 it is 100m.
- 11) The building regulation should state "6.5m from the median height of the erf amsl"

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- 12) Under residential land use page 80. Klipfontein is a primary high density residential area.
- 13) Under recreation page 80. The recreational status the picnic area to the south of the ACWB is not marked.
- 14) Page 80 & 81 Under "authority" the ACWB needs to be included.
- 15) Part of the so called "Kwaaihoek Nature Reserve" is already part of the "Urban Edge" and has infrastructure including roads, picnic area and extraction points for the ACWB. This needs to be resolved p 82.
- 16) Page 83 the sensitive area on the south side of the Kariega River referred to in future residential is the Eric Pudney Reserve and needs to be acknowledged as such.
- 17) Page 81 5.5.2 Vacant land Eric Pudney and ACWB need to be acknowledged.
- 18) Page 81 5.5.3 Eric Pudney is environmentally sensitive and is not acknowledged as such.
- 19) Page 82 5.5.4. under D in table land allocation for Marselle sewerage expanded works needs to be identified.
- 20) Page 82 under H the picnic area at Bushmans is not acknowledged.
- 21) Page 83 Under Future open space Eric Pudney reserve is the strip of land to the north of Ekuphumleni.
- 22) Page 84 Under future authority. A third bullet should read expansion of solid waste and sewerage treatment works at Marselle. Not only Ekuphumleni works.

Johann Smuts
Chairman Bushman's River Ratepayers Association

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