



## forestry, fisheries & the environment

Department:  
Forestry, Fisheries and the Environment  
REPUBLIC OF SOUTH AFRICA

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Ref: EDMS 219504

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Dear Ms. Masala Mugwagwa

**SUBJECT: COMMENTS ON THE PROPOSED UPGRADE OF THE TRANSNET HELIPAD INFRASTRUCTURE IN THE PORT OF RICHARDS BAY, WITHIN THE JURISDICTION OF THE CITY OF UMHLATHUZE LOCAL MUNICIPALITY IN KWAZULU NATAL PROVINCE- AUTHORITIES MEETING**

The Branch Oceans & Coasts (O&C) of the Department of Forestry, Fisheries, and the Environment (DFFE) appreciates the opportunity granted to comment on the Proposed Upgrade of the Transnet Helipad Infrastructure in the Port of Richards Bay, within the Jurisdiction of the City of UMhlatuze Local Municipality in KwaZulu Natal Province. 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**").

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 the coastal zone are maintained, and that

people, properties, and economic activities are guarded against dynamic coastal processes. Guided by the principles of integrated coastal management, this Branch continues to strive for social equity and promote the sustainable use of coastal resources.

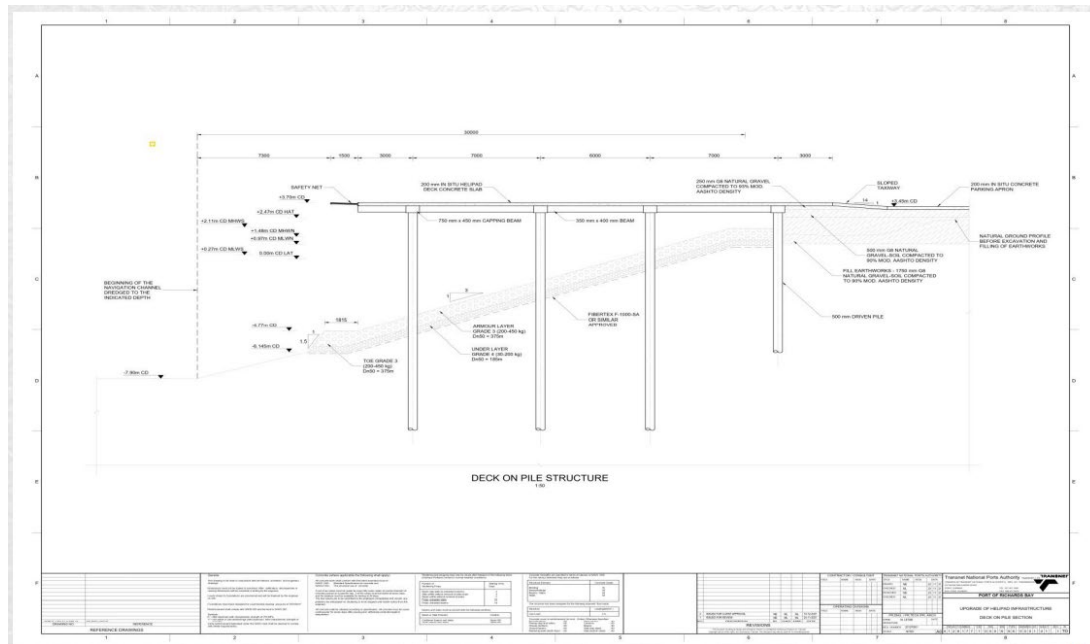
The below comments and recommendations were provided based on the information presented as part of the authorities' pre-application meeting which was held on 07 June 2022 and the site inspection conducted on 09 June 2022. Detailed comments and recommendations which will further critique the overall assessment of identified activities, site, layout, and technology alternatives and specialist recommendations will follow when the applicant has embarked on the application process.

**Areas for further Review and Further Input for the Attention of the Environmental Assessment Practitioner (EAP) and Transnet National Ports Authority (TNPA) as the Applicant for the Development Proposal:**

- 1.1 The project background outlines that Transnet National Ports Authority (TNPA) operates a helicopter service for the transportation of Marine Pilots as part of the pilotage services. It is further elaborated that in line with the Aviation insourcing strategy, the current infrastructure facilities are not adequate to accommodate one additional helicopter, equipment, and personnel for rendering maintenance and operational services. Moreover, the shared offices and ablution facilities are not adequate to house these numbers of personnel. This further motivates the decision taken by Port Management to embark on the process of exploring alternatives for upgrading existing facilities to accommodate the purchasing of an additional helicopter for operational and customer requirements.
  
- 1.2 From the information presented, the need and desirability for this project were not clear given the constraints associated with the preferred site (proximity of development site/proposed activities to the estuary and Richards Bay Estuary mouth, climate change impacts, and coastal vulnerability of the site, socio-economic benefits, alignment with Port Master Plan/ long-term planning- consideration for cumulative and unintended impacts). The EAP should include a detailed project for the need and desirability of this project. The motivation should provide specific information which clarifies; the current use of the helicopters in line with Port activities and functions, the frequency/number of trips currently being conducted with current infrastructure versus the future anticipated trips/frequency, and the role of the proposed infrastructure; the need for the proposed upgrades when taking into long-term expansion and growth of the Port, the current and future proposed activities at the Port, specific considerations that

need to be taken into the decision-making on the proposed alternatives, for example, Civil Aviation and Maritime Laws, policies and procedures, other plausible site alternatives for exploration, layout alternatives and technology alternatives, dimension of the proposed helipad. The EAP needs to provide specific detail which clarifies issues associated with existing infrastructure on-site versus the need for new and improved infrastructure- clarify the need for the complete demolition of existing infrastructure versus the upgrades to the existing infrastructure when considering the associated financial costs. Outline the fueling and storage needs and how they will be considered and factored into the long-term planning and decision-making.

1.3 The drawing below illustrates the deck on pile structure for the proposed helipad as was presented in the meeting. However, details on the engineering designs and construction method to be applied during the construction stage (drilling, excavation for the helipad, the technology to be utilized, the material, and equally supporting advantages and disadvantages associated with alternatives (material, technology, and layout) need to be clearly outlined in the report.



1.4 It was further noted that the site where the proposed piles will be placed is rocky and currently has gabion rocks as a stabilisation technique. According to the Department's Coastal Viewer, the coastal vulnerability risk index for the property confirms that the proposed site falls within a high coastal vulnerability risk for estuary flooding and erosion risk (see attached Addendum A). A Climate Change and Coastal Vulnerability Risk Assessment is recommended to provide further recommendations on the engineering

designs that would be best suited to accommodate the climate change risks and constraints associated with this site.

1.5 It is noted that **ONLY** Activity 12- *The clearance of an area of 300 square meters or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. d. KwaZulu Natal (vi) Within the littoral active zone or 100 metres inland from the high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas* has been considered for this application. Considering that the proposed site is located within 100m of the HWM of Richards Bay Estuary and the anticipated construction method, this is incorrect as additional activities could potentially be triggered. This Branch recommends that the EAP, together with the applicant further engages in defining the construction method, including material and technology to be applied to include this in the report. Following this, this Branch recommends the re-assessment of this aspect and identification of all listed activities that will potentially be triggered by this application. It is only then that this Branch can adequately advise on other listing activities that will be triggered and/or not applied for.

1.6 It was specified as part of the presentation that during the construction phase, the operation will be temporarily relocated to the Small Craft Harbour. This proposal is supported. However, further details on the procedure that will be applied to move the existing shipwrecks on-site and the relocation plan are required for further input and decision-making.

1.7 It is noted that only layout alternatives have been proposed for the upgrades (Layout 2A & B, 3A & B, and 4A & B). However, this Branch maintains that inadequate site alternatives have been explored to provide rationale and/or motivate the selection of the preferred site. More site alternatives need to be explored and presented in the report, including concise motivation on the constraints/ advantages and disadvantages associated with each site alternative and key issues that were taken into account as part of the site selection process that needs to be considered by the competent authority.

1.8 This Branch further recommends for the following specialist studies be undertaken:

- Coastal Engineering and Climate Change and Coastal Vulnerability Risk Assessment-to advise on the coastal and flood risk and long-term, cumulative, and unintended climate change risks associated

with the development site location. It should be noted that the site will be influenced by a range of climatic and non-climatic environmental changes or socio-economic changes. This assessment should provide more information on this to further provide support for decision-making.

- Estuary Impact Assessment- The Branch O&C notes that an Estuary Impact Assessment is not proposed. More clarity is required on the potential long-term, cumulative, and unintended impacts of this development proposal on Richards Bay Estuary throughout all project phases.
- Aquatic Biodiversity Impact Assessment- to assess the impact of the development proposal on aquatic biodiversity. While it was clarified that the proposed landing strip will be mounted on pile support, the construction method to achieve this will potentially impact marine and aquatic biodiversity. This further necessitates the merits of each alternative be carefully weighed against the externalities to inform whether this proposal is socially responsible, economically justifiable, and ecologically sustainable.
- Socio-Economic Assessment- to assess the impact of the development proposal on the neighboring community, current and future tourism activities, recreation, and adjacent community, and how this application could potentially impact the ability of the local community to maintain and sustain their livelihoods. Past assessment of similar applications has revealed that there is inadequate consideration of cumulative impacts. The scope of cumulative impacts is often limited to direct impacts (project-related activities) and the scope often fails to consider long-term, unintended impacts resulting from similar activities within one area of interest (proposed Port Master Plan, current Port operations, and future Port operations). The aspect that is often unacknowledged is that all the anticipated impacts will potentially be taking place together within proximity to key resources and recreational areas used by the community (Naval Island). This Branch would propose that the assessment reviewer and appointed specialist take cognisance of this and report on the significance of these impacts as part of this study.
- Noise Impact Assessment- to assess the cumulative noise impact associated with the addition of more helicopters on the immediate environment and neighboring community.

1.9 This Branch will provide detailed comments and recommendations during the next public process when specialist studies have been conducted and more information is available.

1.10 This Branch further requests to be registered as an I&AP.

Kindly note that the Department reserves the right to revise its comments and request further information based on any additional information that might be received. All future correspondence and documentation (hard copy or an electronic copy) must be submitted to our office via [OCEIA@dfe.gov.za](mailto:OCEIA@dfe.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.**

Yours Sincerely



**ACTING DIRECTOR: COASTAL CONSERVATION STRATEGIES**

**DATE: 08/07/2022**