

**Resource Management Services**  
**PO Box 4296**  
**DURBANVILLE**  
**7551**

**7 July 2014**

Attention: Mr Larry Eichstadt

Dear Sir,

**Re: Bitou Municipality – Proposed Establishment of public drop-off facilities within the Bitou Municipal Area.**

We refer to the document issued by yourselves for comment, dated May 2014 and wish to compliment the Municipality and RMS on the progressive attitude and approach to sustainable Waste Management which is contained in the report.

The NVRA represents the majority of home-owners in NV and is involved in an ongoing basis with the municipality on the issues of domestic waste collection, organic waste management and general cleanliness of the existing Waste Transfer Site (WTS). Natures Valley has fairly unique demands when it comes to the matter of waste management, such as:

- The Village is visited regularly by baboon troops in search of food and a regular first stop for them, is the WTS. Therefore the management and cleanliness of this facility is vital in limiting baboon invasions of houses. The Municipality has recently provided the homeowners with wheelie-bins which will help to reduce the trashing of domestic waste left out for collection. Unfortunately the bins are very small and during holiday season they will generally not accommodate all the waste generated by full houses. So there will still be bags to trash.
- There are only about 40 houses in NV which are permanently occupied, however there are many houses which are let out to holiday makers, who come and go throughout the year. Keeping visitors advised of good waste management practises is a challenge.
- The population of the village increases ten-fold over the Dec-Jan holiday season, which places unusual demands on the municipality and waste management in general and many crises have been experienced at this time of the year when there is a break-down in service delivery.
- The existing WTS is located on the edge of the residential area and its cleanliness and activities on the site impact directly on numerous properties in close proximity.
- Natures Valley is located within the De Vasselot section of the Tsitsikamma National Park and the existing WTS borders on the environmentally sensitive indigenous forest.

## COMMENT ON PROPOSED NATURES VALLEY DROP-OFF

### **Taking the above unique conditions into account, the NVRA does not agree fully with the recommendations contained in the report relating to the Natures Valley Drop-off Facility.**

The report talks about “buffer zones” being essential in the selection of the drop-off sites. No buffer zone exists in the case of the NV site and although, as regularly stated in the report, the facility has been operating effectively for around 30 years, changing its operations to include semi-industrial activities does not mean it will continue to operate without complaints.

As stated the NV WTS has been in operation for many years and has served a very useful purpose in coping with the seasonal, transient nature of the occupation of the village. It has allowed departing holiday-makers to deposit bags safely without the need to leave them on the pavement for collection and has also been used and continues to be used by SANParks as a safe and serviced drop-off facility for refuse collected in the area.

Unfortunately the cleanliness and quality of management of the facility has been very variable. It was originally established by the Divisional Council and was quite well managed while under their control. Unfortunately, since Bitou Municipality took over service delivery to Natures Valley, the routine management has been generally poor.

Any upgrades should be designed to function without daily (7 day) management of the site, as based on current experience, this will not be provided.

The proposal to upgrade the facility to handle not only domestic waste but also organic (garden) waste, builder’s rubble, hazardous waste and recyclables is admirable but we do not believe it is practical or sustainable, for the following reasons:

1. The WTS is very much within the residential area, with four or five houses within 100m of the site and at least two inside 50m.
2. The Municipal Erf on which the WTS is located has been earmarked for use in the provision of a sewage treatment facility for NV. Therefore the footprint of any waste management activities on this Erf should be kept to a minimum so that plans for future sewage treatment facilities are not negatively affected.
3. The dumping of builder’s rubble would encourage the movement of relatively heavy vehicles very close to residential properties, with the associated noise, dust, general wear and tear and safety concerns. In addition it does not seem to make sense to be double-handling builder’s rubble when building contractors in any event include in their contracts for carting away rubble. Any change in this arrangement would not be in the interest of the community.

Small amounts of builders rubble produced by home-owners DIY projects could be catered for at the site in a suitable container or skip and this would be welcomed. Such builders rubble should be limited to waste that can be carried and deposited “by hand”.

4. A Hazardous Waste skip or container should be subject to the same constraints as DIY builder’s rubble. Dumping “by-hand” only.
5. An organic waste drop-off and chipping facility is also not practical on a site which is within a residential area. Noise is identified in the report as a key negative impact. The proposed

mitigating measures to ensure that noise from the site is acceptable (ie. limiting the operating hours of the chipper) will not be effective in avoiding complaints from residents. To cope with the very large quantities of garden waste which are generated during the holiday season, the chipper would be working continuously during the proposed “acceptable hours” between 0800 and 1700. This would not be regarded as acceptable by homeowners who have invested in NV to enjoy the peace and quiet.

The irony is that during long periods in the year, when the nearby houses could well be unoccupied, the chipper would not work very hard at all, so the investment in a machine dedicated NV does not make sense.

In the event of a breakdown of the machine during the season, the garden refuse would build up to unmanageable quantities very quickly. This situation was demonstrated in Dec 2013 when the Municipality opened the WTS to organic waste with the intention of chipping it on site. The experiment did not work and the site was closed to organic waste very quickly.

So even ignoring the noise issue, we do not believe that the NV site is a viable choice for receiving and processing organic waste.

We believe it would be a more practical and sustainable solution to create a “regional” organic waste drop-off at the Kurland site, where space and noise is not a consideration due its proposed location. A more regular flow of organic material from the Kurland, Craggs, Natures Valley and other adjoining areas would warrant the investment, management and operating costs of an industrial chipping facility.

An organic waste drop-off at Kurland would be a very welcome option for the area, compared to having to travel to the current Plett site.

6. We are strongly in favour of retaining the existing domestic waste drop-off in NV as it is critical in providing a facility to store waste to suit the varying departure dates of holiday makers. The most crucial aspect is that it is baboon-proof and secure against access by scavengers.

The proposal to utilize a skip with ramp access does not provide a good solution in NV as a skip cannot be made baboon-proof. If the municipality are considering changing to vehicles which can only handle skips, then the skip would need to be contained in the existing, or similar, enclosure.

7. The depositing and collection of recyclables does not get a significant mention in the report. However, we regard provision for recyclables as an extremely important part of any improvement to the existing site, which must cater for suitably designed containers to store large quantities of recyclable material. The number of permanent residents in NV does not warrant a regular house to house collection by the Municipality’s recycling contractor, however he should be able to collect from a central location, on request. The container or containers for recyclables must also be baboon-proof otherwise the site will be trashed in the search for food.

A provision for dumping bottles and glass, similar to the existing “igloo” must be retained. The igloo works relatively well, however some modifications should be considered to make

the depositing and removal of glass more efficient. Currently many glass bottles are left standing alongside the igloo as users are too lazy to deposit “bottle-by bottle”.

8. Good site management is emphasised in the Report as being critical for the success of all the proposed drop-off sites. The NV WTS has suffered for years from abusive use resulting from the lack of any active control by the Municipality. Unfortunately we do not see this situation changing dramatically in the near future. Currently the NVRA and certain concerned residents are paying for routine site clearing to be carried out. Grudging assistance is provided by the municipality when things get out of hand. All signage and locking of gates has been procured and paid for by the NVRA. The photographs of the site in the report were taken at a time when the WTS had received some attention by the Municipality a few years back. The current appearance is very different.

By limiting the nature and extent of the facilities as outlined above and allowing for public access on foot only, the management can be minimised to one of routine inspection, site cleaning and washing down of enclosures and any paved areas.

### **NVRA Recommendations for Natures Valley Drop-off Facility**

Taking the above comments into account and the recommendations made in the RMS Draft Report we would envisage the ideal drop-off facility at NV should consist of the following:

1. The existing domestic waste enclosure to be renovated to ensure that it is user-friendly (for depositors and collectors), thoroughly baboon-proof and suitably lockable to prevent abusive dumping and access by scavengers.  
Provision to be made for utilising a high pressure washer for cleaning the enclosure and the entry ramp. Because the enclosure sits below ground level, a large sump should be provided from which the cleansing vehicle can pump the polluted water following a wash-down.
2. A skip to be provided for hand-carted junk and builder’s rubble only. This to be cleared by the Municipality, on request.  
A similar skip or other suitable container to be provided for hazardous waste.  
Contractor’s rubble and hazardous waste to be carted to nearest builder’s rubble drop-off, either at Kurland or Plett sewage works.
3. A domestic waste recyclables enclosure to be provided, which is baboon and scavenger proof for dumping paper, cardboard, plastic and cans, preferably un-separated. Waste to be contained in plastic bags.  
Home-owners would deposit recyclables at their convenience to be collected by the Municipal contractor, on request.
4. A bottle and glass collection “igloo” preferably raised above ground to facilitate collection and clearing and fitted with a “chute” or large opening for depositing more than one bottle at a time.
5. No facilities to be provided for receiving organic waste. All organic waste to be carted to Drop-off at Kurland.

6. Foot-print of facilities to be kept as small as possible, with only foot-traffic access provided for the public.
7. Security fence to be provided around the entire site, with a good quality timber fence facing the road, for aesthetic reasons. Vehicle access gates to be sliding to ensure long life and provided with rugged closure and locking mechanisms.
8. Site to be routinely inspected and cleaned up on a weekly basis to ensure a litter and junk-free environment.  
Regular maintenance to be carried out to ensure that the site remains baboon-proof and fully functional.  
High pressure washing of the enclosure and ramp to be carried out on a quarterly basis or as necessary.  
During the December-January holiday season a full time site manager to be provided by the municipality, 7 days a week, to ensure that the site is correctly utilised.
9. Aesthetically acceptable but highly visible and informative signage to be provided.

**We wish to emphasise that the NVRA regard a satisfactory resolution to the design and functioning of the NV WTS as an extremely important community issue and the views expressed are wholly supported by the Natures Valley Trust.**

**We appreciate the fact that this study and its associated recommendations have been tabled and trust that our comments are accepted as an attempt to arrive at a practical solution to an ongoing problem with which we are very familiar.**

**We would appreciate the opportunity to discuss our comments and proposals should there be any clarification required.**

Yours sincerely,



**Doug Blaine**

Chairman, NVRA

On behalf of the Natures Valley Ratepayers Association

Cc. The Municipal Manager – Mr A Paulse  
The Municipal CLO – Mr M duPlessis  
Ward Representative for Ward 1 – Mr Bill Nel  
The Director NV Trust – Dr Mark Brown