

postal Private Bag X6546, George, 6530
physical 4th Floor, York Park Building, York Street, George 6530
website www.capenature.co.za
enquiries Megan Simons
telephone +27 87 087 3060 **fax** +27 44 802 5313
email msimons@capenature.co.za
reference LE14/2/6/1/6/1/443-66&67_Housing_Plettenberg Bay
date 12 December 2022

Eco Route Environmental Consultancy,
P.O. Box 1252,
Sedgefield,
6573

Attention: Ms Janet Ebersohn
By email: janet@ecoroute.co.za

Dear Ms Janet Ebersohn

THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED DEVELOPMENT OF A BEACHFRONT SECURITY ESTATE ON PORTION 66 AND 67 OF FARM 443, PLETTENBERG BAY, BITOU LOCAL MUNICIPALITY, WESTERN CAPE.

CapeNature would like to thank you for the opportunity to review the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature wishes to make the following comments:

According to the Western Cape Biodiversity Spatial Plan (Pool-Stanvliet *et.al.* 2017)¹ the property has Ecological Support Areas (ESA 1: Terrestrial). The property does not have any freshwater features, but a depression wetland is mapped to the west according to the National Wetland Map 5².

The Vlok and de Villiers (2007) fine scale vegetation map describes the area as Groenvlei Coastal Forest and Wilderness Forest-Thicket. According to Mucina and Rutherford (2006)³ and the Western Cape Biodiversity Spatial Plan (Pool-Stanvliet *et.al.* 2017) the vegetation is **Endangered**⁴ Garden Route Shale Fynbos.

Following a review of the dBAR and specialist studies, CapeNature wishes to make the following comments:

1. CapeNature is satisfied that the WCBSP (Pool-Stanvliet *et.al.* 2017) reasons layer and land use guideline handbook were considered and included in the proposed development considering the entire site is mapped as natural ESA.

¹ Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. Stellenbosch: CapeNature.

² Van Deventer, H., van Niekerk, L., Adams, J., Dinala, M.K./ Gangat, R., Lamberth, S.J., Lötter, M., MacKay, F., Nel, J.L., Ramjukadh, C.J., Skowno, A., Weerts, S. 2019. National Wetland Map 5-An Improved Spatial Extent and representation of inland aquatic and estuarine ecosystems in South Africa.

³ Mucina, L. & Rutherford, M. C. (EDS) 2006. The Vegetation of South Africa, Lesotho and Swaziland. Strelitzia 19. South African National Biodiversity Institute, Pretoria. (Revised 2012)

⁴ National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004). The Revised National List of Ecosystems that are Threatened and in need of protection. 2022. Government Gazette No. 47526

2. The development must remain within the existing development footprint, as far possible. Erecting infrastructure near sensitive habitats must be prohibited.
3. The property has protected tree species⁵ and in terms of section 15(1) of the National Forests Act⁶, no person may cut, disturb, damage, or destroy any protected tree or possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree except under a license granted by the Minister.
4. The botanical specialist mentioned the vegetation resembles Goukamma Dune Thicket which is Least Concerned.
5. The proposed site is surrounded by residential development, does not have a high density of plant species, and has been disturbed. The botanical specialist did not find any sensitive areas other than the primary dune. It is also stated that the dune system east of the wetland has lost its ecological value. Is there any potential to rehabilitate the dune?
6. Both specialists have alluded to the importance of conserving the foredune. Coastal ecosystems are ecological infrastructures that provides a range of regulatory services to coastal communities⁷. The foredunes play an essential role in providing physical buffering against sea storm surges and other potential climate change related impacts. Gardening and landscaping should not result in removal or destruction of vegetation which will either destabilize a primary or significant dune or cause a significant adverse effect on the dune system due to increased erosion by natural coastal processes or human movement, or detrimentally affect the ecology or habitat. CapeNature supports the mitigation measures that the foredunes must not be impacted and should be in a functional near-natural state.
7. The property forms part of a coastal corridor, which is an important ecological infrastructure. These areas are important corridors to maintain landscape connectivity, it is crucial that no further disturbances occur, and that the area must be restored, if possible, to improve connectivity and reduce landscape fragmentation.
8. Eradication of invasive alien plant species are of high priority and CapeNature agrees. In terms of the Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983) (CARA) the level of alien infestation must not be seen as reducing the site sensitivity, nor is the subsequent removal of alien vegetation from a property regarded as a mitigation measure as this is a legal requirement. Infestation by alien plants does not necessarily mean that an area is not important for biodiversity as some vegetation types are particularly prone to invasive alien infestation but may recover when cleared of alien vegetation and rehabilitated.
9. If the alien invasive vegetation was managed at the property, the vegetation may have recovered with indigenous vegetation.
10. While the terrestrial fauna reported concluded that the site is not sensitive for animals, fencing around the property must be visible to wildlife, including birds, by fitting reflective or colorful weather-resistant flags (e.g., aluminum, or plastic strips) to the wire.
11. The botanical specialist concluded the proposed development will not negatively impact the spread of fire and once the alien vegetation are removed the property will not have any flammable vegetation. CapeNature reminds the applicant that section 12 (1) and 2 (a) of National Veld and Forest Act⁸ states that an adequate firebreak must be prepared and maintained around the property to reasonably prevent the spread of unwanted fires in the area.

⁵ National Forest Act, 1998 (Act No. 84 of 1998). Notice of the List of Protected Tree Species under the National Forest Act, 1998 (Act No. 84 of 1998). 2014. Government Gazette No. 37941

⁶ National Forest Act, 1998 (Act No. 84 of 1998). 1998. Government Gazette No. 19408.

⁷ Cadman, M. (ed.). 2016. Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape, Edition 2. Fynbos Forum, Cape Town.

⁸ National Veld and Forest Act 1998 (Act 101 of 1998) Government Gazette: 19515

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Associate Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Loubser, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack

12. A suitably qualified Environmental Control Officer (ECO) must be appointed to ensure the mitigation measures are implemented and to mitigate for any negative impacts during construction.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Megan Simons', with a large, stylized flourish extending to the right.

Megan Simons
For: Manager (Landscape Conservation Intelligence)