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**Reference** LE14/2/6/1/6/2/ERF2003\_Commercial\_  
Wilderness  
**Date** 07 March 2024

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

Attention: Ms Samantha Teeluckdhari  
By email: [samantha@ecoroute.co.za](mailto:samantha@ecoroute.co.za)

Dear Ms Samantha Teeluckdhari

**THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED  
CONSTRUCTION OF A RESIDENTIAL DWELLING AND FOUR SELF-  
CATERING GUEST COTTAGES ON ERF 2003, WILDERNESS, GEORGE LOCAL  
MUNICIPALITY, WESTERN CAPE.**

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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 has previously provided comments for this application (CapeNature reference: *LE14/2/6/1/6/2/ERF2003\_Housing\_Wilderness*). Following a review of the dBAR we wish to make the following comments:

1. The specialist described the vegetation to be Southern Afrotemperate Forest with elements of Goukamma Dune Thicket which are both (SANBI 2022)<sup>1</sup>. Furthermore, the Vlok and de Villiers (2007)<sup>2</sup> fine scale vegetation map describes the vegetation Wolwe River Fynbos-Forest. Therefore, it is important to note that fynbos is a fire-maintained ecosystems and fire plays an important role in determining species composition and community type. Thus, in the absence of fire fynbos will become senescent and mosaics of forest and thicket pioneer's species will start "invading" (Rebelo *et al.* 2006)<sup>3</sup>.

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<sup>1</sup> Government of South Africa (2022) South African Red List of Terrestrial Ecosystems: assessment details and ecosystem descriptions. Technical Report #7664, SANBI Pretoria, South Africa.

<sup>2</sup> Vlok JHJ, de Villiers R (2007) Vegetation Map for the Riversdale Domain. Unpublished 1:50 000 maps and report supported by CAPE FSP task team and CapeNature.

<sup>3</sup> 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)

2. The change in vegetation structure and species composition indicates the fynbos on the property has not been managed and maintained properly. Furthermore, the build-up of fuel loads (in the absence of fire) and the presence of invasive alien plants in the greater Wilderness area pose a serious fire risk.
3. The proposed development footprint will be in CBA (Forest). These forests are vulnerable to edge effects and the proposed development may disrupt the ecological integrity of this sensitive habitat (Rebelo, 2016)<sup>4</sup>.
4. Forest vegetation and indigenous protected trees<sup>5</sup> must not be killed or pruned without a permit<sup>6</sup> from the DFFE. In addition, a CapeNature permit would be required for plant and animal search-and-rescue.
5. The botanical specialist concluded the drainage valley is an important for hydrological function of the site and that the proposed development will not have an impact on this system. Has a freshwater specialist been consulted to confirm this?
6. As the soil erodibility is moderate, we remind the applicant that the geology is unstable removing vegetation will destabilise the soil and result in land slipping. Additionally, the heavy rainfall events may also exacerbate the soil condition.
7. CapeNature reminds the applicant of Section 28 of National Environmental Management Act (NEMA) (Act 104 of 1998 as amended) (Duty of Care).

In conclusion, the property falls entirely within CBA and forms part of a continuous CBA corridor towards the east. Furthermore, urban expansion in the broader area will fragment the CBA corridor, which is important for the conservation of the species, ecosystems, supporting ecological processes, and landscape connectivity. The total development footprint will be 1105m<sup>2</sup> of **Endangered** vegetation, natural CBAs, and sensitive forest habitat. We therefore support the alternative proposed by SANParks to increase the disturbance footprint of the main dwelling. CapeNature does not support the loss of natural CBA that is incompatible with the management objectives of CBAs.

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

Yours sincerely,



**Megan Simons**  
**For: Manager (Conservation Intelligence)**

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<sup>4</sup> De Villiers C.C., Driver A., Clark B., Euston-Brown D.I.W., Day E.G., Job N., Helme N.A., Holmes P.M., Brownlie S. and A.B. Rebelo (2016). Ecosystem Guidelines for Environmental Assessment in the Western Cape, Edition 2. Fynbos Forum, Cape Town.

<sup>5</sup> Notice of the List of Protected Tree Species under the National Forest Act, 1998 (Act No. 84 of 1998)

<sup>6</sup> National Forest Act, 1998 (Act No. 84 of 1998). 1998. Government Gazette No. 19408.

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

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