



27 February 2021

## **ENVIRONMENTAL COMPLIANCE STATEMENT**

### **PROPOSED DEVELOPMENT OF THE 7 OAKS RETIREMENT VILLAGE ON ERVEN 103, 104 & PORTION OF ROTTERDAM STREET, WITTEDRIFT, BITOU LOCAL MUNICIPALITY**

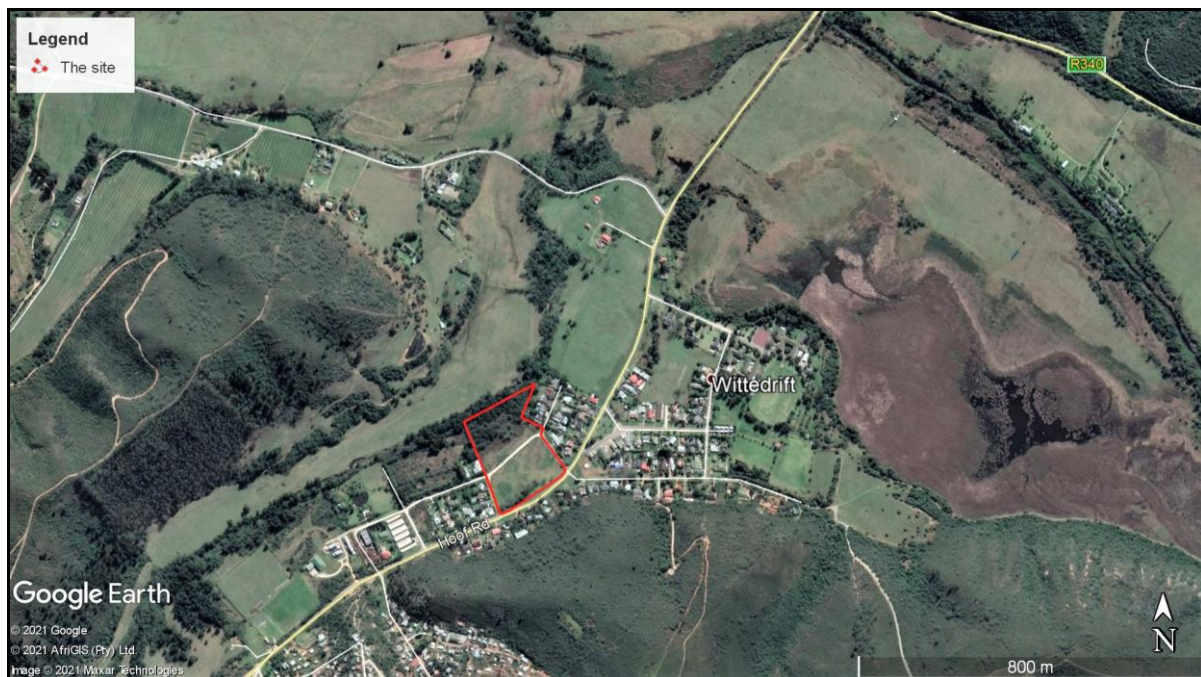
The compliance statement below was requested by Sharples Environmental Services, the appointed EAP. Mark Berry was appointed as an independent biodiversity specialist to prepare the statement (see CV and declaration of independence attached).

#### **Approach**

The preparation of this statement is based on information submitted to the specialist by Sharples and personal knowledge of the larger Wittedrift area, including several biodiversity surveys undertaken in the area by the undersigned. A site visit was not deemed necessary.

#### **The Site**

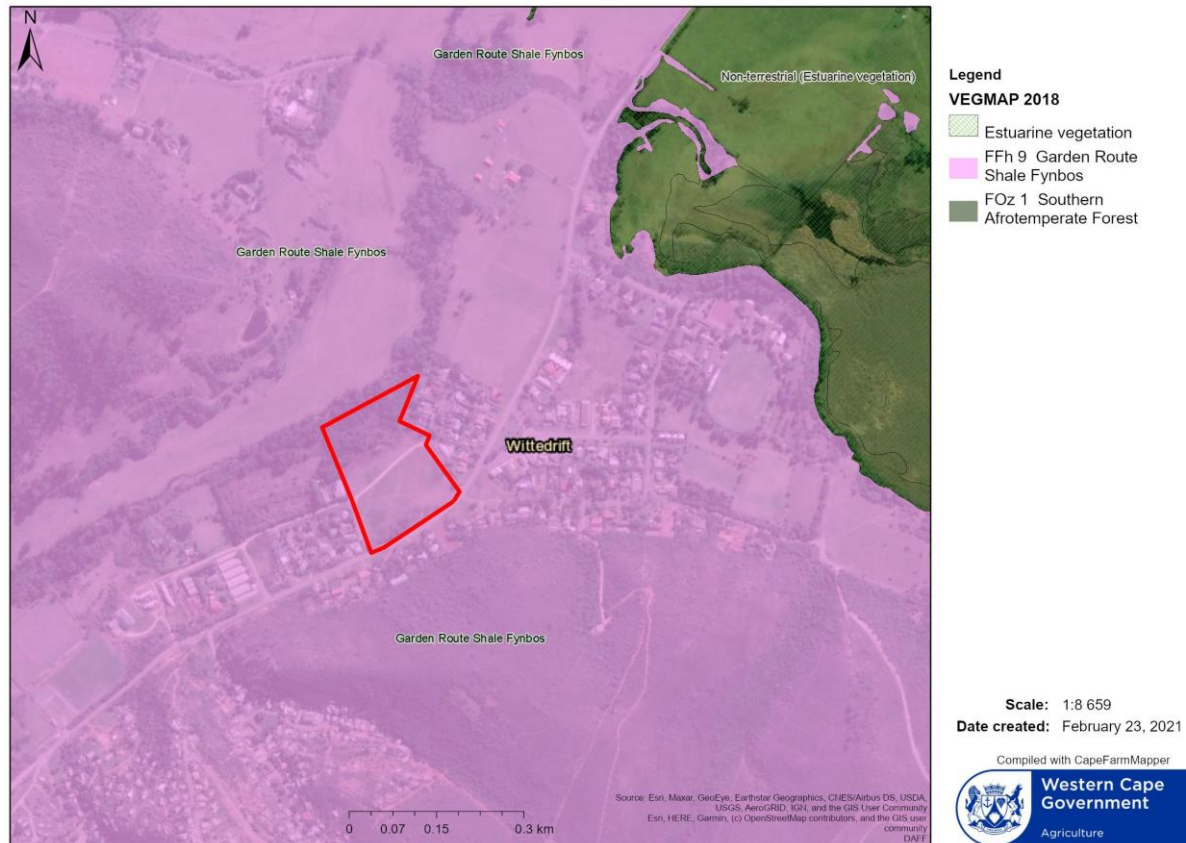
The site (3.6 ha) is located in Wittedrift, a small rural node 5 km northwest of Plettenberg Bay (see Map 1). It comprises a pasture and a floodplain/riverine portion.



**Map 1** Locality plan with the study site outlined in red.

## Status quo biodiversity aspects

The entire site falls within an area mapped as Garden Route Shale Fynbos (see Map 2). The latter is currently listed as Vulnerable in the National Biodiversity Assessment 2018 technical report (Skowno et al. 2019).



**Map 2** Vegetation map with the study site outlined in red.

However, Google Earth (see Photo 1) and a photographic record (see attachment) and report supplied by Sharples Environmental Services (2019) suggest that the site is highly transformed and mostly covered by grasses. According to the above report, grass species such as kikuyu (*Pennisetum Clandestinum*) and love grass (*Eragrostis curvula*), a large group of poplar trees (*Populus alba*) and several oak trees (*Quercus* sp) are found on the site, with no mention of any fynbos (confirmed by author). A few young milkwoods (*Sideroxylon inerme*) were also found in the vicinity of the stormwater outlet at the south-western corner of site. The latter is a protected tree species. Although the undersigned did not inspect the site in person, he is familiar with the Wittedrift area and support the statements from the above report.

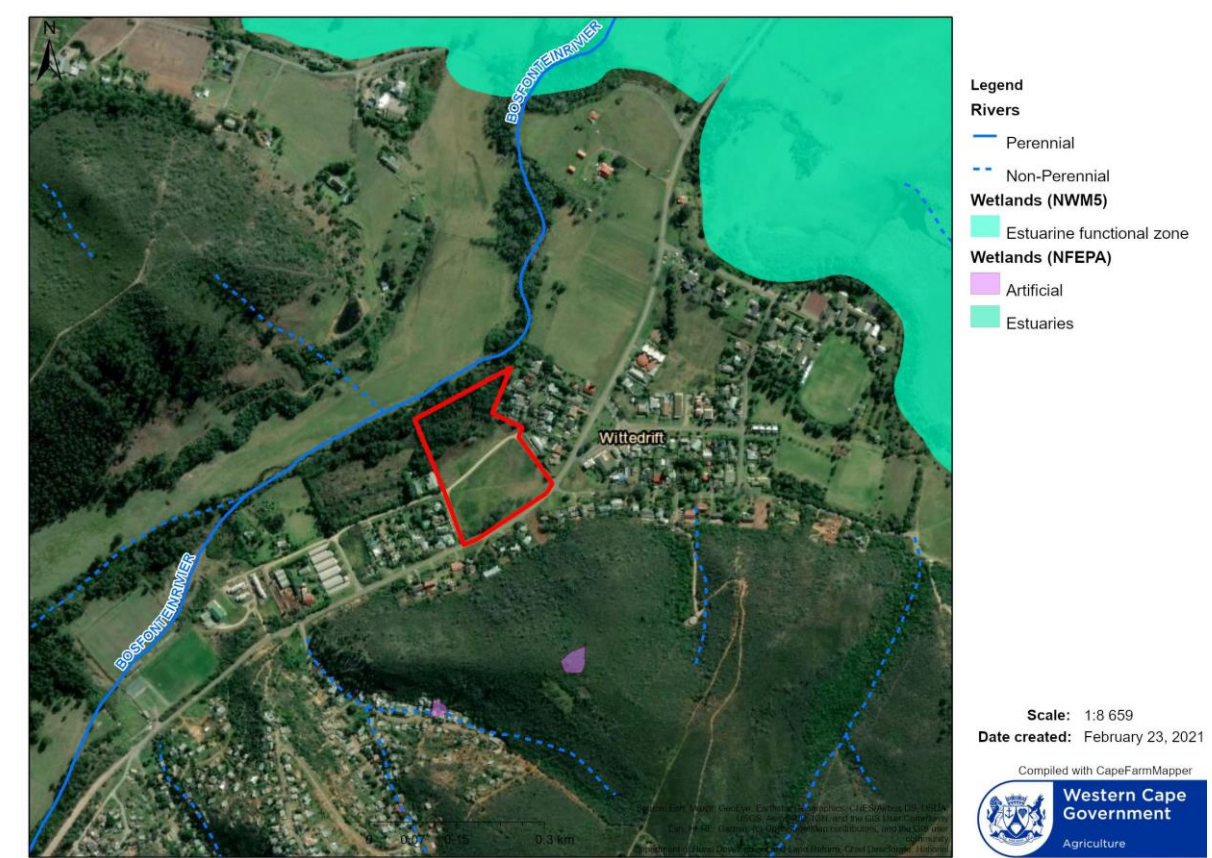
The study site is further located in the Bosfontein River valley, which is a tributary of the Bitou. According to the Sharples report, the Bitou River is the largest drainage system inside the catchment and joins the Keurbooms River in the south to form the Keurbooms Estuary. The Bosfontein reach of the Bitou contains vast floodplain wetland habitat of national biodiversity



importance. According to Map 3, there are no mapped wetlands adjacent to the site. Sharples' report further states that the Bosfontein River "has been impacted by agricultural activities and dams within the catchment for several decades". It is thus in a highly transformed state.



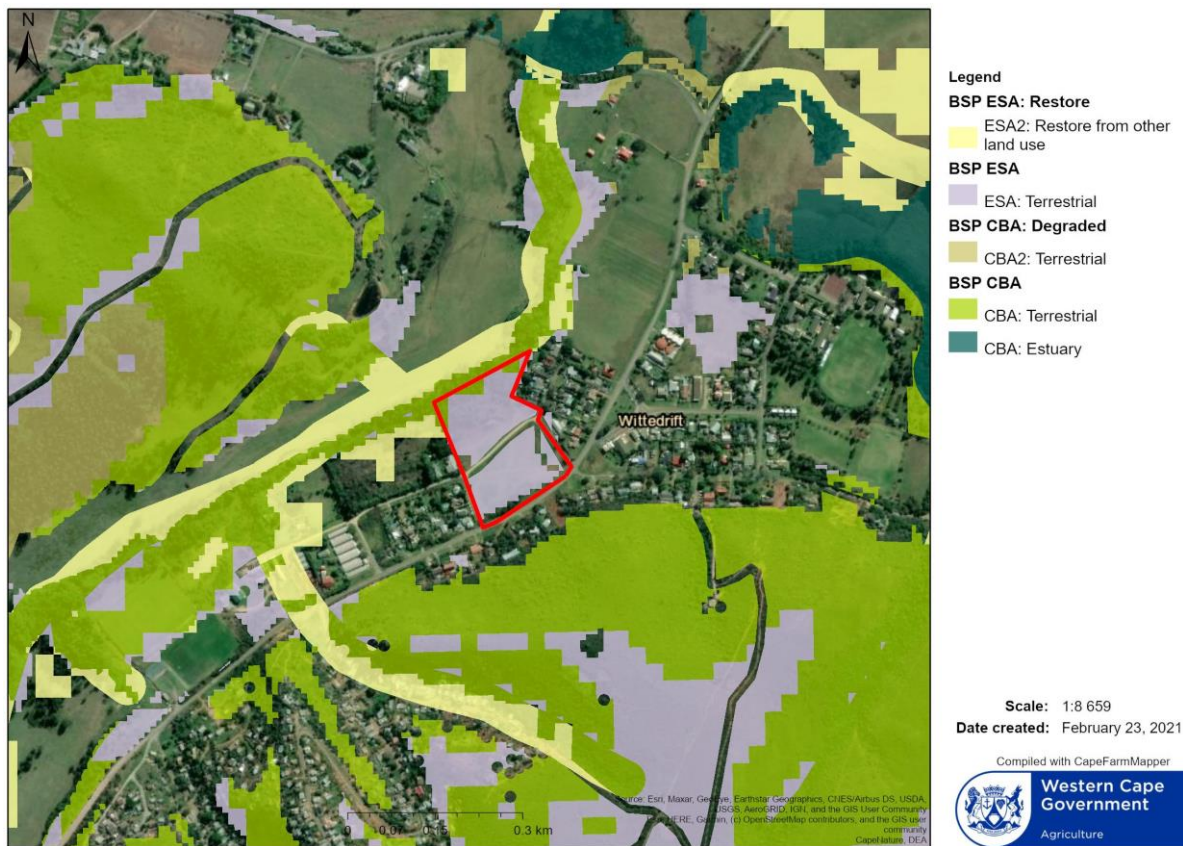
**Photo 1** 2011 Google Earth image of the site (outlined in red).



**Map 3** Hydrology map with the study site outlined in red.



According to Map 4, the site forms part of the larger Plettenberg Bay (Bitou) biodiversity network. It encroaches slightly onto a terrestrial critical biodiversity area (CBA), which is odd since the latter comprises an aquatic feature (Bosfontein River). The majority of the site has been mapped as a terrestrial ecological support area (ESA). The reasons given for this are the possible presence of a threatened vegetation type and for water resource protection. However, given the evidence of the situation on the ground, there is little support for its mapped status. The area proposed for development has been transformed (pasture) with virtually no natural elements (fynbos) remaining.



**Map 4** Biodiversity network map with the study site outlined in red.

Further, as per Sharples' report, "the area proposed for the development is located on top of a fluvial terrace and covered by a highly degraded/transformed terrestrial vegetation. The aquatic habitat on site is located downslope of the terrace, largely outside of any development area. Historically it is likely that the watercourse known as the Bosfontein River was a floodplain wetland system. The degraded habitat within the rest of the valley is presently more characteristic of a lowland river than its estimated historic wetland state. Vegetation in the instream area includes *Wachendorfia* sp and *Zantedeschia aethiopica*. The wetland vegetation itself includes *Cliffortia odorata*, *Phragmites australis* and *Cyperus thunbergii*".

**Given the above evidence, the following compliance statement for indigenous plant and fauna species, and biodiversity in general is presented:**

- The site proposed for the development (outside the river corridor and main wetland area) is highly degraded/transformed and considered to be of low value (and significance) as a viable habitat for indigenous plant and fauna species, and biodiversity in general. No fynbos was recorded on site. It is also unlikely that any species of conservation concern (SCC) will be found on site. Its position inside an urban context largely surrounded by houses, further supports the statement.
- Cognisance must however be taken of the recorded milkwoods and wetland area (on northern side) and planned accordingly. Either the milkwoods must be accommodated inside the development or a permit is needed for its removal. The wetland area must be suitably buffered and rehabilitated (cleared of invasive aliens). The treatment of stormwater runoff from the development into the wetland/riverine area will also require attention.

Prepared by:

A handwritten signature in blue ink, appearing to read 'M. L. Berry'.

Mark Berry Pr Sci Nat, PhD

**References:**

Sharples Environmental Services 2019. Aquatic Habitat Impact Assessment for the proposed development of Erf 103 and Erf 104, Wittedrift, Plettenberg Bay.

Skowno, A.L., Raimondo, D.C., Poole, C.J., Fizzotti, B. & Slingsby, J.A. (eds.) 2019. South African National Biodiversity Assessment 2018 Technical Report Volume 1: Terrestrial Realm. South African National Biodiversity Institute, Pretoria.



## SITE PHOTOS



Image 1: Extent of proposed site.



Image 2: Extent of Erf 104.



Image 3: Main Road and southern neighbouring properties from Erf 104.



Image 4: North-East along Rotterdam Street.



Image 5: South-West along Rotterdam Street.



Image 6: Wetland vegetation on Erf 103.



Image 7: Bosfontein River channel.



Image 8: Illegal dumping on Erf 104.

## BRIEF CV OF SPECIALIST

**M.G. (Mark) BERRY**

**ENVIRONMENTAL CONSULTANT & BIODIVERSITY SPECIALIST**

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### PROFESSIONAL STATEMENT

Biodiversity specialist and environmental assessment professional with nearly 25 years of experience mainly in the Western Cape Province, but also in the Northern Cape, Eastern Cape, Free State and KwaZulu-Natal. Experience in biodiversity assessments, Environmental Impact Assessments (EIA's), Environmental Management Programmes (EMPr's), Environmental Control Officer (ECO) duties and environmental due diligence investigations.

### WORK EXPERIENCE

- 1989-1990** Nature Conservation Officer in the South African Air Force, based at Langebaan Road Air Force Base
- 1997-2005** Employed as principal environmental specialist at Planning Partners, a multi-disciplinary consultancy specialising in town and regional planning, environmental planning and landscape architecture. Duties included the conducting of EIA's, compiling EMPr's, ECO duties, biodiversity surveys and status quo environmental assessments for spatial development frameworks.
- 2000-2006** Examiner for the Board of Control for Landscape Architects (BOCLA), responsible for the setting up and marking of the Environmental Planning Section of exam paper.
- 2005-current** Started Mark Berry Environmental Consultants in June 2005. Responsibilities include office management, seeking tenders, conducting EIA's, compiling EMPr's, construction site environmental audits, biodiversity surveys, etc. A relationship is maintained with previous employer, and, among other, undertook land-use surveys and reporting for the Eskom's site safety reports for three proposed nuclear power plants in the Western and Eastern Cape Provinces.

### QUALIFICATIONS

- BSc (1988) University of Stellenbosch
- BSc-Hons in Botany (1991) University of Stellenbosch
- MSc in Botany (1993) Nelson Mandela Metropolitan University
- PhD in Botany (2000) Nelson Mandela Metropolitan University.

### PROFESSIONAL MEMBERSHIP

Professional member (reg. no. 400073/98) of the South African Council for Natural Scientific Professions (SACNASP). Registered as an ecologist.

### REFERENCES

Dr John Manning (Compton Herbarium, Kirstenbosch)

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Andrew Cleghorn (civil engineer and branch manager at Knight Piesold (Pty) Ltd)

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Prof Eileen Campbell (Department of Botany, Nelson Mandela Metropolitan University)

Phone: (041) 504-2329, e-mail: Eileen.Campbell@nmmu.ac.za



## DECLARATION OF INDEPENDENCE

I Mark Gerald Berry, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I:

- in terms of the general requirement to be independent:
  - **other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity;** or
  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- in terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;
- have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared or to be prepared as part of the application; and
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (as amended).

Signature of the Specialist:



Name of Company:

Mark Berry Environmental Consultants

Date:

27 February 2021