



14 June 2021

## ENVIRONMENTAL COMPLIANCE STATEMENT

### **PROPOSED DEVELOPMENT OF PORTIONS 278 & 282 OF FARM KRAAIBOSCH 195, GEORGE**

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).

#### **The Site**

The site (6.25 ha) is located in Kraaibosch next to the N2 eastbound from George (see Map 1). It is covered by a pasture, horse paddocks and a filling station.



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

#### **Methodology & limitations**

The preparation of this statement is based on a site visit (undertaken on 5 June 2021 by the

undersigned), information and photographs submitted to me by Sharples, including a Screening Report for Environmental Authorisation prepared on 24 July 2020 and Site Verification Report prepared on 29 July 2020, and mapping information obtained from online databases such as the Department of Agriculture's CapeFarmMapper.

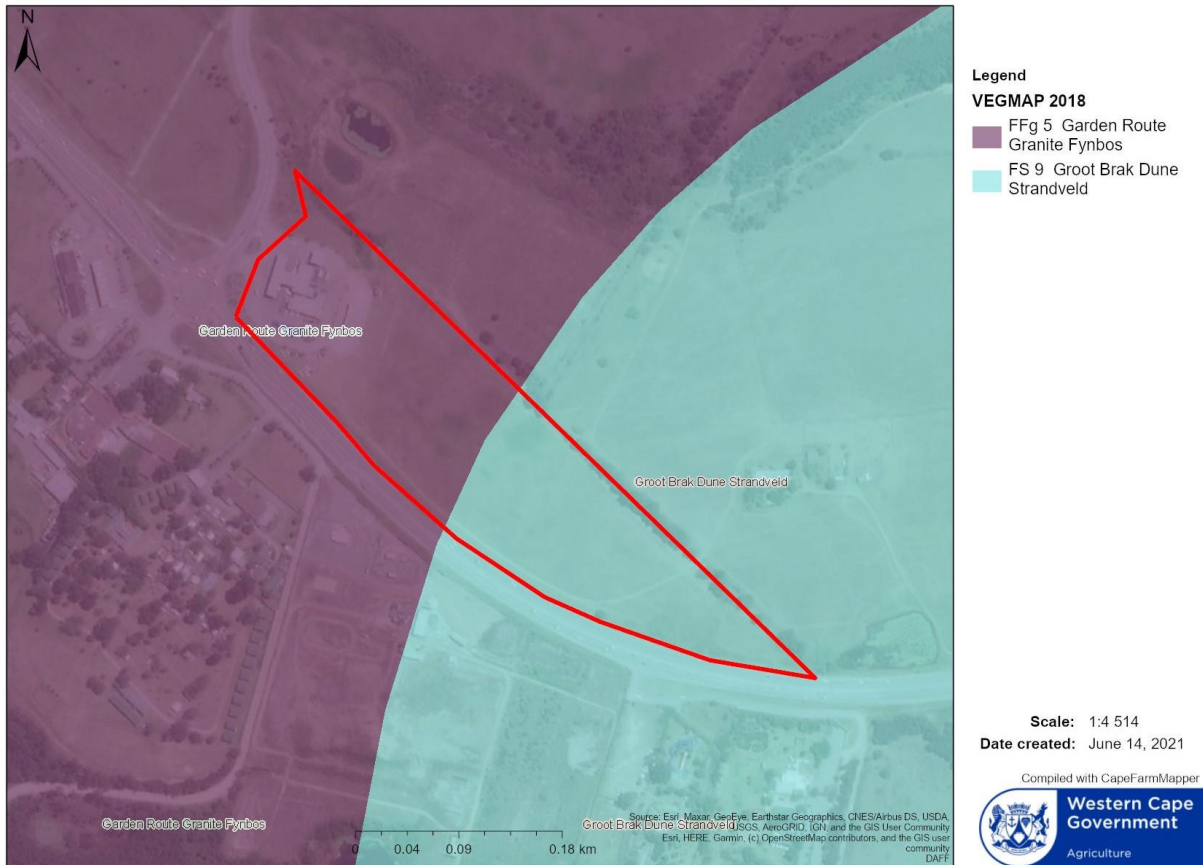
The following guideline documents were considered in the assessment:

- Brownlie, S. 2005. Guideline for involving biodiversity specialists in EIA processes: Edition 1. CSIR Report No ENV-S-C 2005 053 C. Republic of South Africa, Provincial Government Western Cape, Department of Environmental Affairs and Development Planning, Cape Town.
- 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. & Rebelo. A.B. 2016. Ecosystem Guidelines for Environmental Assessment in the Western Cape, Edition 2. Fynbos Forum, Cape Town.
- Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. CapeNature, Stellenbosch.
- 2018 South African National Biodiversity Assessment Report.
- Terrestrial plant species protocol for the specialist assessments prescribed under the NEMA (30 October 2020).
- CapeNature's requirements regarding development applications (9 June 2021).

With regards to seasonality, the site is located in a climatic transition zone and any time of the year is considered suitable for botanical surveys. Geophytes are the only species that may be difficult to identify, if not in flower. Flowering times of these can vary significantly. Given the transformed state of the site, it is not considered an issue. No follow-up surveys are needed.

### **Status quo biodiversity aspects**

The site falls within an area mapped as Garden Route Granite Fynbos and Groot Brak Dune Strandveld (see Map 2). It is likely that the latter mapped area was also granite fynbos, or a transitional form between Garden Route Granite Fynbos and Garden Route Shale Fynbos. The mapping of Groot Brak Dune Strandveld is often overzealous in the larger area at the expense of other vegetation types. Garden Route Granite Fynbos is currently listed as Critically Endangered, while Groot Brak Dune Strandveld is listed as Vulnerable (Skowno et al. 2019). Nevertheless, all these vegetation types are highly transformed and poorly protected, or not protected at all (Skowno et al. 2019).



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

The site has been transformed by past agricultural and development activities, and is currently used as a grazing area for horses, with a filling station in the north-western corner (see Photo 1 and Map 3). No fynbos proper remains, only a few pioneer or resilient species such as *Erica gracilis*, *Rubus rigidus*, *Osteospermum moniliferum*, *Senecio ilicifolius*, *Helichrysum* sp, *Gymnosporia nemorosa*, *Searsia pyroides* and *S. chirindensis*. Buffalo grass (*Stenotaphrum secundatum*), kikuyu (*Pennisetum clandestinum*) and other weeds are the dominant groundcover species. The potential presence of any threatened species on site is highly unlikely.

Sharples has stated in their Site Verification Report (dated 29 July 2020) that the current state of the site has been “ongoing for at least 15 years”. “The property has been utilized for grazing for more than 15 years without any other form of agricultural activities taking place on the property. The site is currently utilized for horses to graze and for recreational horse riding”. Woody aliens recorded include gums (*Eucalyptus* sp) and black wattle (*Acacia mearnsii*) on the north-eastern boundary, and a single blackwood (*Acacia melanoxylon*) on the southern (N2) side. Alien clearing is currently underway along the north-eastern boundary.



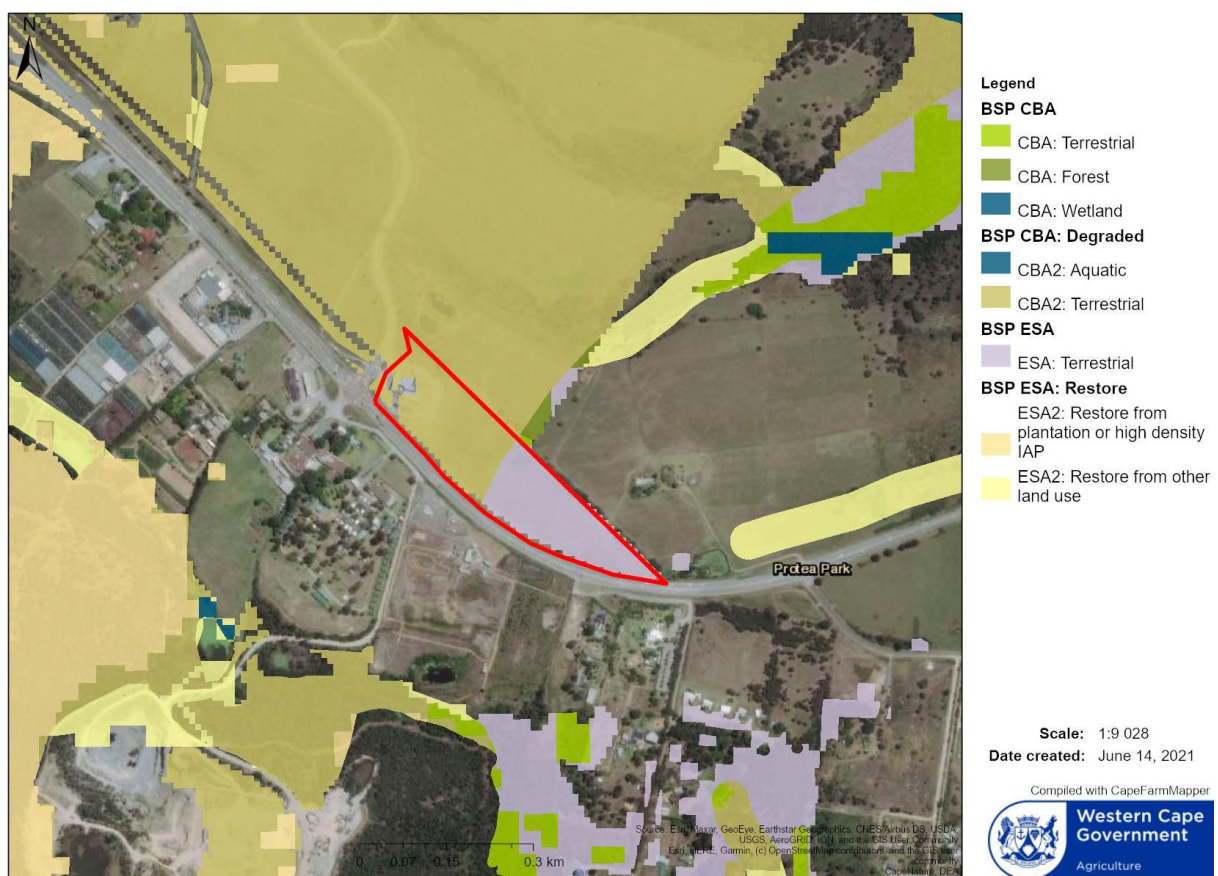
**Photo 1** Images showing the current state of site.



**Map 3** Close-up Google Earth image of the site (outlined in red).

According to Map 4, the site forms part of the larger George biodiversity network. The western half is mapped as a terrestrial critical biodiversity area (CBA2), while the eastern half is

mapped as an ecological support area (ESA). The reasons given for this are the presence of a threatened vertebrate (Bontebok) habitat and water resource (Kaaimans River) protection. The ESA has been mapped as potentially accommodating a critically endangered or endangered vegetation type. However, given the evidence of the situation on the ground, there is no support for its mapped status. Unless actively rehabilitated and restored it is unlikely to return to natural vegetation. The area proposed for development has been transformed (pasture) with no significant fynbos elements remaining. The protection of water sources/resources is another matter, but could possibly be handled on site by means of a sustainable stormwater management system.



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

### Outcome of the Screening Report

Terrestrial biodiversity sensitivity, as per the Screening Report, is summarised below:

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity	Feature(s)
Very High	Endangered ecosystem
Very High	Forest
Very High	Ecological Support Area 1

Very High	Critical Biodiversity Area 2
Very High	Critical Biodiversity Area 1
Very High	Strategic Water Source Area

**Given the above evidence, the following statements for indigenous plant and biodiversity are presented:**

**Sensitive plant species:**

- The site presents a very poor habitat and is highly unlikely to accommodate any Species of Conservation Concern.
- It is recommended that the sensitivity be amended from Medium to Low.

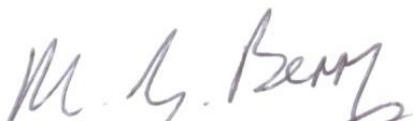
**Sensitive biodiversity:**

- As stated earlier, the site forms part of the larger George biodiversity network. It encroaches onto mapped terrestrial CBA2 and ESA. Apart from the protection of important water resources/sources, the reasons for its mapped status seem unsupported given the transformed state of the site (pasture). No significant terrestrial biodiversity (fynbos) elements remain. The biodiversity component of the site is regarded as low sensitive.
- Given the above, it is recommended that the sensitivity be amended to Medium, for the sake of water source protection.

**Recommendations/conditions**

The site **does not** seem to pose any terrestrial biodiversity constraints for development. However, cognisance must be taken of water source/resource protection and the necessary design and monitoring must be implemented in this regard.

Prepared by:



Mark Berry Pr Sci Nat, PhD

**References:**

Mucina, L. & Rutherford, M.C. (eds) 2006. The vegetation of South Africa, Lesotho and Swaziland. *Strelitzia* 19. South African National Biodiversity Institute, Pretoria.

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

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.

# BRIEF CV OF SPECIALIST

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

**ENVIRONMENTAL CONSULTANT & BIODIVERSITY SPECIALIST**

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**Tel:** 083 286-9470 **Fax:** 086 759-1908 **E-mail:** markberry@webafrica.org.za

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

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## 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 knowledge of the NEMA protocol requirements needed for undertaking biodiversity assessments of this nature;
- 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:

14 June 2021