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Reference LE14/2/6/1/6/2/Farm RE21/195_Residential_
Kraaibosch

date 20 November 2024

Sharples Environmental Services cc,
P.O.Box 9087,
George,
6530

Attention: Mr Michael Bennett
By email: michael@sesc.net

Dear Mr Michael Bennett

THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON THE REMAINDER OF PORTION 21 OF FARM KRAAIBOSCH 195 (PIETER KOEN TRUST), GEORGE LOCAL MUNICIPALITY, WESTERN CAPE.

DEA&DP Reference: I6/3/3/1/D2/19/0033/24

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 farm has Critical Biodiversity Areas (CBA 1: Terrestrial; Aquatic; CBA 2: Terrestrial) and Ecological Support Areas (ESA 1: Terrestrial; ESA 2: Restore). The freshwater features include a drainage line to the north east towards the Swart River which abuts the property to the north. Furthermore, the property is situated within the National Strategic Water Source Area for surface water for the Outeniqua region and serves as a water source protection for the Kaaimans River and Watercourse protection for the South Eastern Coastal Belt.

The fine-scale vegetation map describes the vegetation as Wolwedans Grassy Fynbos and Groot Brak River Floodplain (Vlok *et al.* 2008)². The National Biodiversity Assessment (Skowno *et al.* 2018)³ mapped the vegetation units as **Endangered** Garden Route Shale Fynbos and **Critically**

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

² Vlok JHJ, Euston-Brown DIW, Wolf T. 2008. A vegetation map for the Garden Route Initiative. Unpublished 1: 50 000 maps and report for C.A.P.E. FSP Task Team, Oudtshoorn.

³ Skowno, A. L., Poole, C. J., Raimondo, D. C., Sink, K. J., Van Deventer, H., Van Niekerk, L., Harris, L. R., Smith-Adao, L. B., Tolley, K. A., Zengeya, T. A., Foden, W. B., Midgley, G. F. and Driver, A. 2019. National Biodiversity Assessment 2018: The status of South Africa's ecosystems and biodiversity. Synthesis Report. Pretoria, South Africa. 214 pp.

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

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Mr Mervyn Burton, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Mr Paul Slack

Endangered Garden Route Granite Fynbos (NEM:BA, 2022)⁴. Following a review of the dBAR and specialist assessment reports, CapeNature has the following comments:

1. Most of the surrounding area has been transformed by residential development. The rehabilitation of degraded CBAs will most likely be low. However, considering the hydrological network, it may be worth rehabilitating the degraded ESA that falls outside the proposed development plan (Pool-Stanvliet *et al.* 2017).
2. It is understood that the high sensitive areas which included the watercourse and steep slopes will not be developed and treated as no-go areas. Thus, the proposed development must not have any negative impacts on these areas.
3. The SWSA for the Outeniqua region is of national importance and their ecological functioning must be protected and maintained (Le Maitre *et al.* 2018)⁵. The property is within an important hydrological area therefore the smaller stream networks need to be managed especially the quality to ensure downstream ecosystems are not negatively affected. Furthermore, the Environmental Control Officer should ensure that the proposed development remains outside the 12 m aquatic buffer.
4. Soil erosion control measures, water and pollution run-off must be strictly implemented. All runoffs must be managed in a manner as to minimise or prevent erosion.
5. Invasive alien species have numerous negative impacts on ecosystem functioning. Removal of invasive alien plant species should be compliant with the National Environmental Management: Biodiversity Act (Act No.10 of 2004)⁶. Furthermore, we recommend aliens outside of the proposed area, also be removed during the alien clearing phase.

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)

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

⁵ Le Maitre, DC., Walsdorff, A., Cape, L., SeyAler, H., Audouin, M, Smith-Adao, L., Nel, J.A., Holland, M. and Witthüser. K. 2018. Strategic Water Source Areas: Management Framework and Implementation Guidelines for Planners and Managers. WRC Report No. TT 754/2/18. Pretoria: Water Research Commission.

⁶ Government Gazette No. 37885, GN No. R. 598 (2014) National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) Alien and Invasive Species Regulations, 2014.

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