

**physical** 4<sup>th</sup> Floor, York Park Building,  
York Street, George, 6530

**website** [www.capenature.co.za](http://www.capenature.co.za)

**enquiries** Megan Simons

**telephone** 087 087 3060

**email** [msimons@capenature.co.za](mailto:msimons@capenature.co.za)

**Reference** LE14/2/6/1/6/1/RE501/Linear Infrastructure\_  
Wittedrift

**date** 20 January 2026

Sharples Environmental Services cc,  
P.O.Box 443,  
Milnerton,  
7435

Attention: Ms Jessica Gossman  
By email: [jessica@sesc.net](mailto:jessica@sesc.net)

Dear Ms Jessica Gossman

**THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED REMOVAL AND REPLACEMENT OF THE EXISTING ROAD AND CULVERT INFRASTRUCTURE LOCATED ALONG DIVISIONAL ROAD (DR) 1791-KM-1-59 STOPPAD ROAD, WITTEDRIFT, BITOU LOCAL MUNICIPALITY, WESTERN CAPE.**

**DEA&DP Reference: 16/3/3/1/D1/14/0026/25**

---

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 (CapeNature, 2024)<sup>1</sup>, the proposed development is partially located within areas mapped as Critical Biodiversity Areas (CBA 1 and CBA 2: Terrestrial). The fine-scale vegetation map indicates that the affected area comprises Groot Brak River Floodplain, Piesang River Fynbos-Forest, and Sedgefield Coastal Grasslands (Vlok *et al.*, 2008)<sup>2</sup>. According to the SA vegetation map<sup>3</sup> the vegetation is Garden Route Shale Fynbos which is **Endangered** (NEM:BA, 2022)<sup>4</sup>.

The development directly affects a channelled valley bottom wetland (Leermansdrift River) and indirectly affects the Bietou River floodplain wetland, which is of national importance. The Bietou River forms part of a Strategic Water Source Area (SWSA) within the Outeniqua surface water system. CapeNature has reviewed the application and has the following comments:

---

<sup>1</sup> CapeNature. 2024. 2023 Western Cape Biodiversity Spatial Plan and Guidelines. Unpublished Report

<sup>2</sup> 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 Unpublished 1: 50 000 maps and report for C.A.P.E. FSP Task Team, Oudtshoorn.

<sup>3</sup> South African National Biodiversity Institute (2006-2024). The Vegetation Map of South Africa, Lesotho and Swaziland, Mucina, L., Rutherford, M.C. and Powrie, L.W. (Editors), Online, <https://bgis.sanbi.org/Projects/Detail/2258>, Version 2024.

<sup>4</sup> 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

1. Limit all construction activities strictly to the approved construction and deviation road footprint. Clearly demarcate CBA areas and no-go zones prior to construction.
2. Active rehabilitation of all disturbed CBA areas after construction must be done. These measures include re-contouring disturbed areas, stabilisation of soils and re-establishment of indigenous riparian or wetland vegetation where feasible.
3. The eradication of invasive alien vegetation must be continuous and comply with the National Environmental Management: Biodiversity Act (Act 10 of 2004)<sup>5</sup> and its associated Alien and Invasive Species Regulations<sup>6</sup>. Construction equipment should be cleaned prior to site entry to prevent the introduction of alien propagules.
4. Restrict works within the watercourse to the smallest practicable working corridor. Schedule in-stream works, where possible, during low-flow periods/ dry seasons. The riparian and wetland areas must be rehabilitated after construction.
5. The applicant must ensure compliance with the National Water Act (Act 36 of 1998)<sup>7</sup> including any Water Use Authorisation requirements.
6. Although no SCC were observed by the Specialist, prohibit night-time construction where feasible to reduce disturbance. Any fauna encountered during construction must be safely relocated by a suitably qualified person.
7. An Environmental Control Officer (ECO) must be appointed for the duration of construction.
8. The proposed development aligns with the objectives of the Climate Change Act (Act 22 of 2024)<sup>8</sup>, particularly with respect to climate adaptation and resilience. The upgrading of the existing causeway addresses vulnerabilities to increased flood frequency and intensity, which are projected under climate change scenarios.

In conclusion, CapeNature does not object to the proposed development, provided that all recommended mitigation and rehabilitation measures, as outlined in the specialist studies, are fully implemented and adhered to for the duration of construction and rehabilitation.

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)**

---

<sup>5</sup> National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004), Government Gazette No. 26436

<sup>6</sup> Regulations under the National Environmental Management: Biodiversity Act (Act No. 10 of 2004): Alien and Invasive Species Regulations, Government Gazette No. 43735

<sup>7</sup> National Water Act, 1998 (Act No. 36 of 1998). Government Gazette No. 19182.

<sup>8</sup> Republic of South Africa. (2024). Climate Change Act, 2024 (No. 22 of 2024). Government Gazette 50966.

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

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar