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**Reference** LE14/2/6/1/6/2/RE ERVEN 236&237\_Linear  
Infrastructure\_Herold's Bay

**date** 13 March 2026

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

Attention: Ms Lue-anne de Waal  
By email: [luanne@sesc.net](mailto:luanne@sesc.net)

Dear Ms Lue-anne de Waal

**THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADING OF THE HEROLD'S BAY SEWAGE PUMP STATION 1 AND ASSOCIATED RISING MAIN AND THE DEVELOPMENT OF PUMP STATION 4 AND NEW ASSOCIATED INFRASTRUCTURE, ON ERF 116, ERF 110, ERF 113, ERF 114, REMAINDER OF ERF 95, FARM 386, REMAINDER OF FARMS 236 AND 237 AND PORTIONS 0 10, 35 AND 37 OF FARM BRAKFONTein NO. 236, HEROLDS BAY, GEORGE LOCAL MUNICIPALITY, WESTERN CAPE.**

**DEA&DP Reference: 16/3/3/1/D2/29/0003/26**

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 activity will cross Critical Biodiversity Areas (CBA 1 & 2: Terrestrial). The fine-scale vegetation map describes the vegetation as Herold's Bay Asteraceous Fynbos and Groot Brak River Floodplain (Vlok *et al.*, 2008)<sup>2</sup>. According to the South African Vegetation Map (Beta VegMap, 2024)<sup>3</sup>, the vegetation units present are Garden Route Granite Fynbos and Groot Brak Dune Strandveld, which are listed as **Critically Endangered** and **Endangered**, respectively (NEM:BA, 2022)<sup>4</sup>.

Part of the sewer pipe also transverses a natural unchannelled valley-bottom wetland (Nel *et al.*, 2011)<sup>5</sup>. Furthermore, the property is within the National Strategic Water Source Area surface

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 Unpublished Report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 Unpublished 1: 50 000 maps and report for C.A.P.E. FSP Task Team, Oudtshoorn.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

<sup>5</sup> Nel, J.L., Murray, K.M., Maherry, A.M., Petersen, C.P., Roux, D.J., Driver, A., Hill, L., Van Deventer, H., Funke, N., Swartz, E.R., Smith-Adao, L.B., Mbona, N., Downsborough, L. & Nienaber, S. (2011). Technical Report for the National Freshwater Ecosystem Priority Areas project. WRC Report No. K5/1801

water for the Outeniqua region and serves as a watercourse protection for the South Eastern Coastal Belt. CapeNature has reviewed the draft Basic Assessment Report and associated specialist assessments, and we have the following comments:

1. The Garden Route Granite Fynbos is one of the **seven high risk Critically Endangered** vegetation types in South Africa (Skowno et al. 2018)<sup>6</sup>. While portions of the proposal involve upgrading existing infrastructure within previously transformed or disturbed areas, several components of the project traverse natural and highly sensitive Critical Biodiversity Areas (CBA) and intact natural vegetation. Protection of remaining intact examples of this ecosystem is therefore considered a national conservation priority. Where feasible, alternative alignments should be considered to reduce disturbance within sensitive areas.
2. The remainder of ERF 236 and ERF 237 was presented to CapeNature's Stewardship Review Committee Meeting on 15 September 2022. The Stewardship Review Committee solely focusses on assessing the biodiversity value and the potential for protected area expansion. The majority of the committee members agreed that based on the biodiversity value the site can qualify for **Contract Nature Reserve**.
3. The Western Cape Biodiversity Spatial Plan identifies priority areas for conservation and is a driving principle for the Western Cape Protected Area Expansion Strategy. Conserving the site within the protected areas estate is in line with the CBA objectives. Declaring the property in terms of NEM:PAA would safeguard the CBA corridor which is aligned to the management objectives. In addition to CBA, which is a core criterion for protected area expansion, the property meets the following criteria of the Western Cape Protected Area Expansion Strategy:
  - **Threatened ecosystems:** *Critically Endangered (Garden Route Granite Fynbos);*
  - **Under-protected ecosystems and strategic landscapes:** *Not protected;*
  - **Essential habitat for priority species:** *Yes, several Species of Conservation Concern were found;*
  - **Strategic Water Source Areas:** *Outeniqua SWSA for surface water; and*
  - **Climate change and connectivity corridors:** *contributing to the protection of the Maalgate River estuary.*
4. Given that the property qualifies for declaration as a Contract Nature Reserve, it is important that any development within the proposed conservation area does not compromise the long-term conservation objectives of the site. The proposed infrastructure should therefore be carefully evaluated in consultation with the landowner and the stewardship partners to ensure that:
  - Conservation objectives remain achievable.
  - Development does not compromise the ecological integrity required for formal declaration.
  - Long-term management of the site remains feasible.
5. CapeNature recommends that the landowner and stewardship partners be formally consulted regarding the proposed development, as the proposed infrastructure may influence future conservation planning and management of the site.
6. Previous biodiversity assessments undertaken on the property recorded several species of conservation concern, including species classified as **Near Threatened** (*Cullumia carlinoides*, *Erica dispar*, *Freesia caryophyllacea*, *Freesia leichtlinii* ssp. *Alba*, *Holothrix Pilosa*, and

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<sup>6</sup> 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.

*Oxalis pendulifolia*), **Endangered** (*Euchaetis albertiniana*, *Disa hallackii*, *Lampranthus pauciflorus*, and *Muralta knysnaensis*), **Vulnerable** (*Drosanthemum edwardsiae* and *Gladiolus vaginatus*). The current botanical assessment only recorded *Cullumia carlinoides*.

7. It is therefore recommended that consultation be undertaken with the botanists involved in the earlier surveys, including Jan Vlok and Bionerds, to confirm survey timing, methodology and possible locations of recorded species.
8. Pre-construction walk-down surveys during the appropriate flowering season should be undertaken to ensure that species of conservation concern are not impacted.
9. The wastewater treatment and effluent management must be aligned with the long-term protection of the surrounding biodiversity and ecological processes.
10. Strict environmental management and rehabilitation measures must be implemented during construction, including clear demarcation of no-go areas, minimisation of the construction footprint, erosion and sediment control, and rehabilitation using locally appropriate indigenous vegetation.
11. Access along the pipeline servitude should be strictly controlled to prevent the creation of new informal access routes which could facilitate illegal dumping, wood collection, poaching or further disturbance of the natural environment.

In conclusion, CapeNature understands the need to upgrade essential municipal infrastructure; however, given the biodiversity sensitivity and stewardship status of the site, the proposal must demonstrate that ecological integrity and conservation objectives will not be compromised.

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)**