

From: markberry@webafrica.org.za
Sent: Thursday, 02 July 2026 10:11
To: christiaan@sesc.net
Cc: michael@sesc.net; cean@sesc.net
Subject: RE: Wittedrift Part 2 Amendment- Request for Specialist Confirmation

Morning Christiaan

No change required since the layout has not changed.

Regards,
Mark

From: christiaan@sesc.net <christiaan@sesc.net>
Sent: Thursday, 02 July 2026 09:52
To: markberry@webafrica.org.za
Cc: michael@sesc.net; cean@sesc.net
Subject: RE: Wittedrift Part 2 Amendment- Request for Specialist Confirmation

Hi Mark,

The commencement of construction was delayed by measures beyond the clients control, and therefore the duration of construction should remain the same as was originally proposed in the EA. The amendment is simply to extent the validity period of the EA by 5 years due to the delay in commencement. With regards to your previous assessment, will there be any change in the significance ratings of the impacts in your previous assessment? In other words, will the extension of the implementation period itself alter the findings and conclusions of the original assessment?

Kind regards,

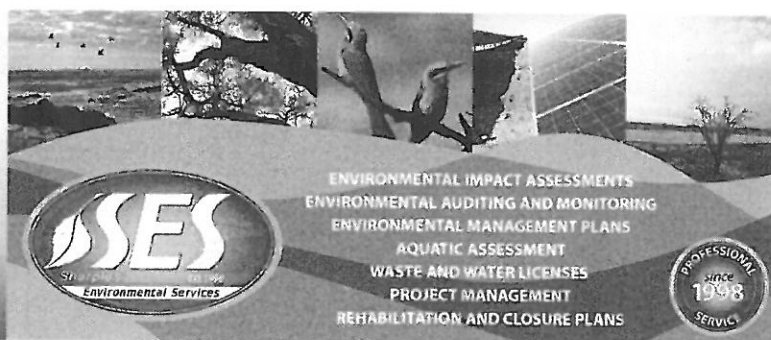
Christiaan Smit

Candidate Environmental Assessment Practitioner
EAPASA Reg. No. 2024/8297
BSc Biodiversity and Ecology
PGD Environmental Management
MPhil Environmental Management

TEL: (044) 873 4923
EMAIL: Christiaan@sesc.net

17 Cathedral Square, George
PO Box 9087 | George | 6530

WEB: www.sesc.net



From: markberry@webafrica.org.za <markberry@webafrica.org.za>
Sent: Thursday, 11 June 2026 15:27
To: cean@sesc.net
Cc: michael@sesc.net; christiaan@SESCC.NET
Subject: RE: Wittedrift Part 2 Amendment- Request for Specialist Confirmation

Good day Cean

Some of the info related to the veg map and status of the vegetation is out of date. Also the CBA map. Furthermore, it is unlikely that the original veg cover was shale fynbos, more likely a thicket or alluvial type. I can make the changes on a time cost basis if there is a budget. But note that this is an old report and format which may not be acceptable to DEA&DP anymore!

Regards,
Mark

From: cean@sesc.net <cean@sesc.net>
Sent: Thursday, 11 June 2026 07:48
To: markberry@webafrica.org.za
Cc: michael@sesc.net; christiaan@SESCC.NET
Subject: Wittedrift Part 2 Amendment- Request for Specialist Confirmation

Dear Mark,

I hope you are well.

We are currently processing an amendment to the EA (DEA&DP Ref: 16/3/3/1/D1/17/0000/21; NEAS: WCP/EIA/0000939/2021) for the proposed retirement village at Erf 103 and 104, Wittedrift.

The amendment is limited to a validity extension from 1 November 2027 to 1 November 2032, with no change to the approved development footprint, layout, or infrastructure.

Please note that the original specialist study was completed on 27 February 2021 and the EA, EMPr, and relevant study are attached for your reference.

In terms of Regulation 32 of the NEMA EIA Regulations, 2014 (as amended), and as per DEA&DP correspondence, this amendment must follow a part 2 (substantive) amendment process, including confirmation that existing specialist studies remain valid.

Kindly confirm whether:

- your original assessment remains valid; and
- the extended implementation period has any impact on your findings or conclusions.

Kind regards,

Cean Cornelison
Environmental Consultant
BA Geography
BA Honours Geography and Environmental Science

TEL: (044) 873 4923
EMAIL: Cean@sesc.net

17 Cathedral Square, George
PO Box 9087 | George | 6530
WEB: www.sesc.net





11 June 2021

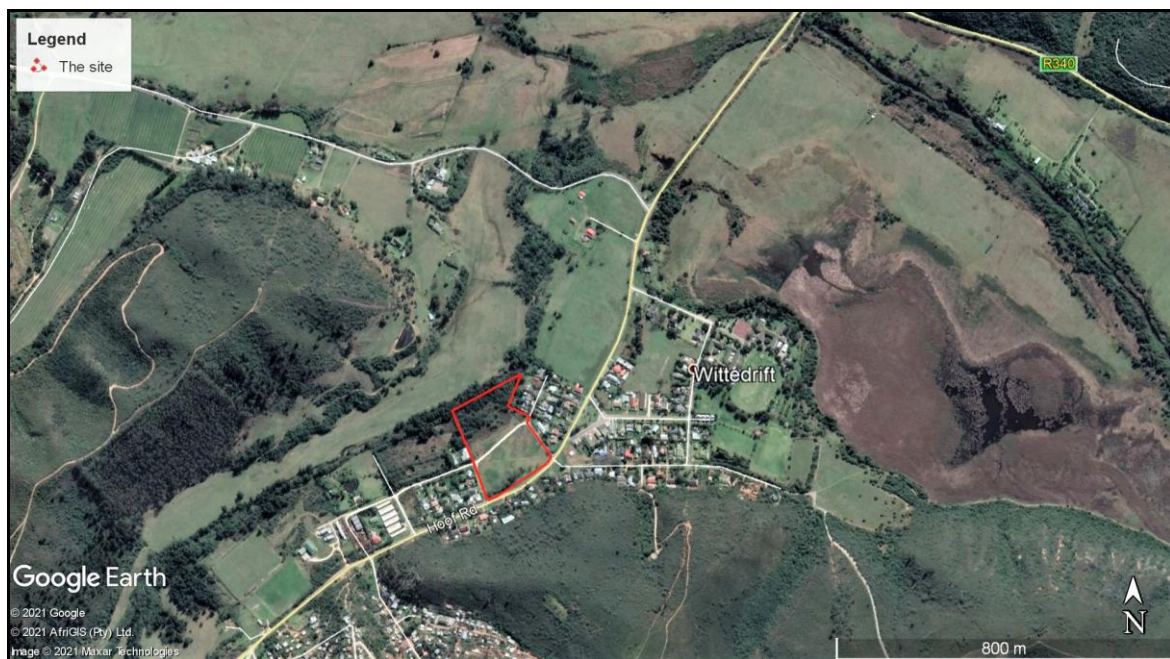
ENVIRONMENTAL COMPLIANCE STATEMENTS

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

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

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.

Methodology & limitations

The preparation of this statement is based on information and photographs submitted to me by Sharples, including a Screening Report for Environmental Authorisation prepared by

Sharples on 23 June 2020, information obtained from online databases such as iNaturalist¹ and CapeFarmMapper, and personal knowledge of the larger Wittedrift area, including several biodiversity surveys undertaken in the area by the undersigned. Debbie Fordham of Sharples who conducted a freshwater assessment of the site in August 2019 also provided me with first hand botanical information of the site.

Given the transformed/disturbed state of the site, a site visit by the undersigned was not deemed necessary. 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.

The undersigned is not a fauna specialist and the statement provided with regards to sensitive fauna is based on the fact that the site is transformed/disturbed and regarded as a largely compromised habitat. A fauna specialist with more intimate knowledge of the area may present a better quantified or different opinion.

Apart from those mentioned above, no other limitations to the statements were identified.

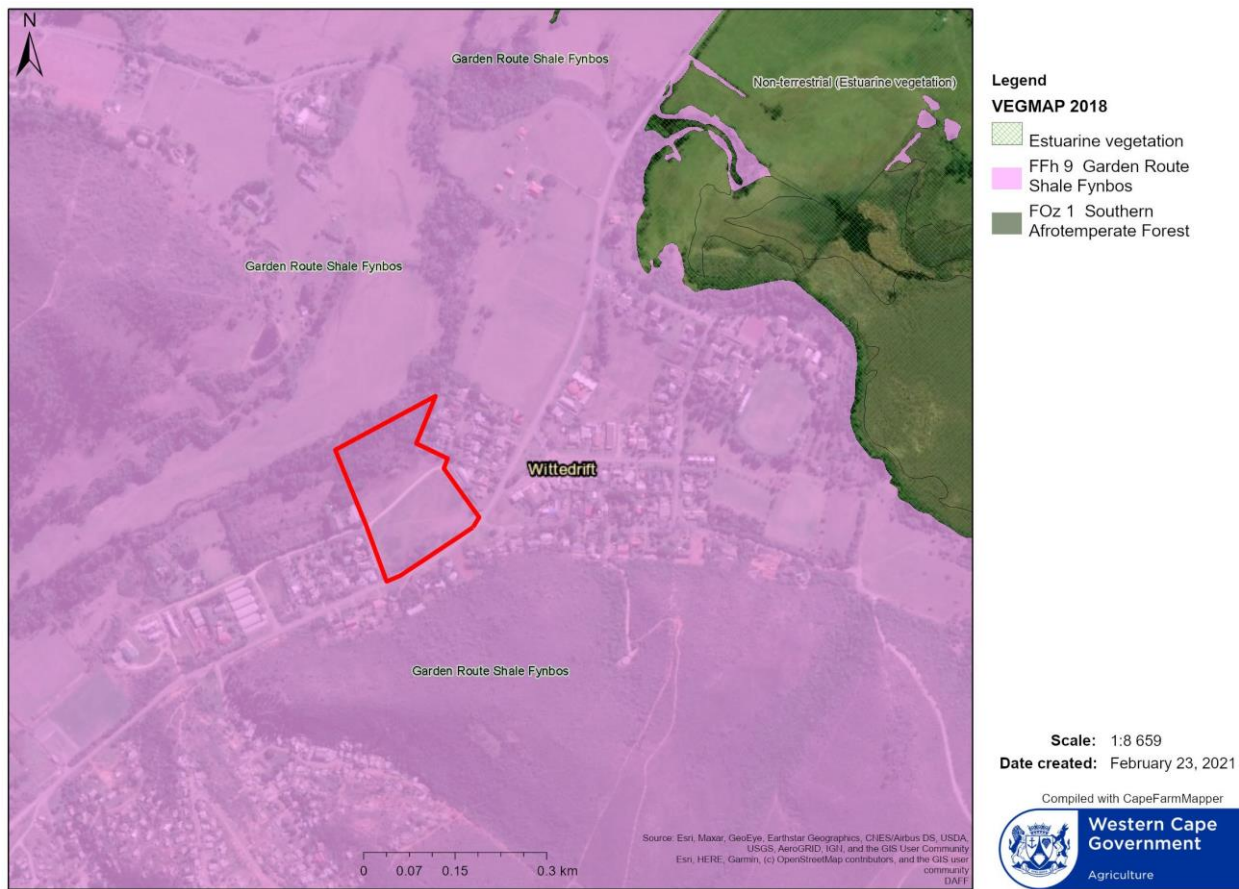
Status quo biodiversity aspects

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). Given its alluvial setting next to a river, the vegetation would more likely have been a type of Cape Lowland Alluvial Vegetation. The earliest aerial photographs of the site only show cultivated areas. Being highly transformed, Cape Lowland Alluvial Vegetation is currently listed as Endangered (Skowno et al. 2019). Only 37% of its original extent remains.

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,

¹ [A Community for Naturalists · iNaturalist](#)

he is familiar with the Wittedrift area and support the statements from the above report.

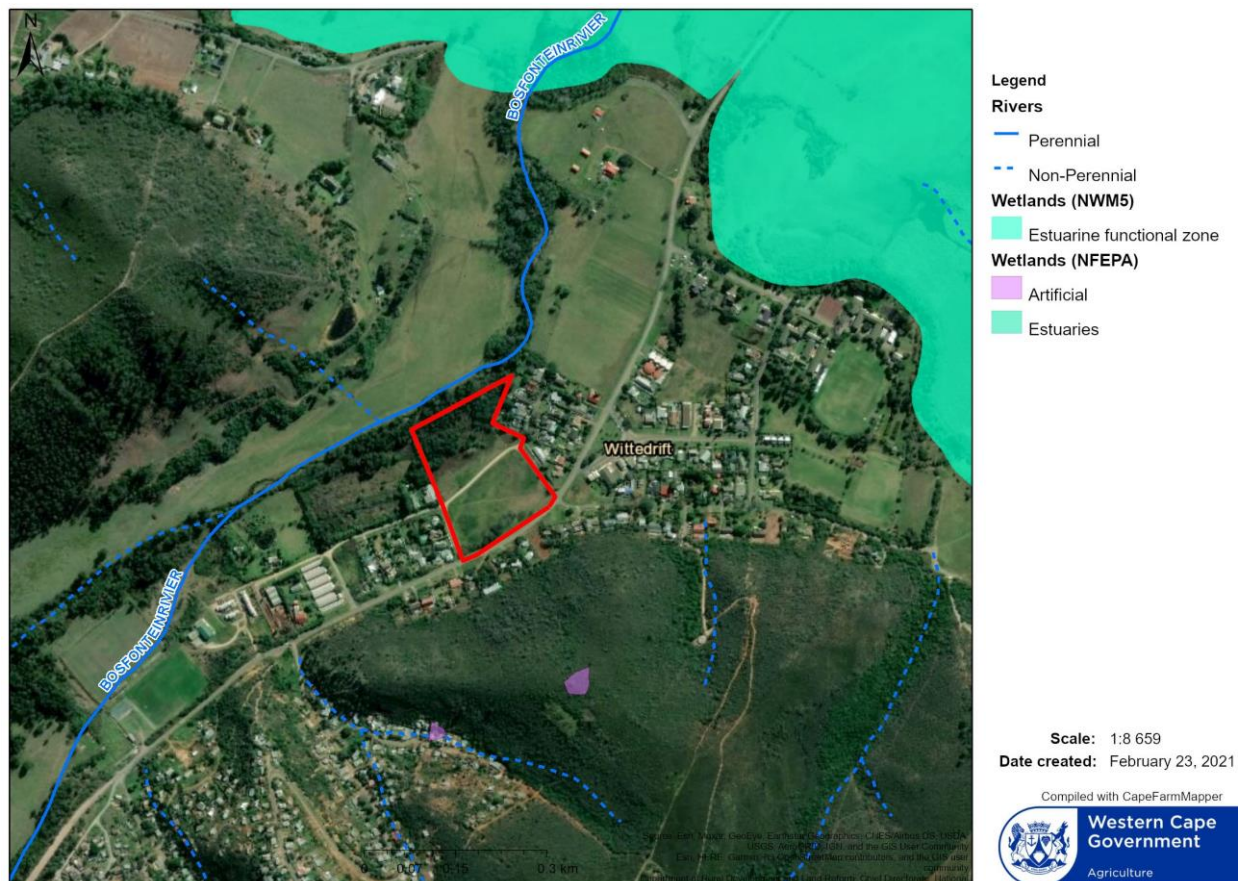


Map 2 Vegetation map with the study site outlined in red.



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

The study site is further located in the Bosfontein River valley, which is a tributary of the Bitou. According to 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.

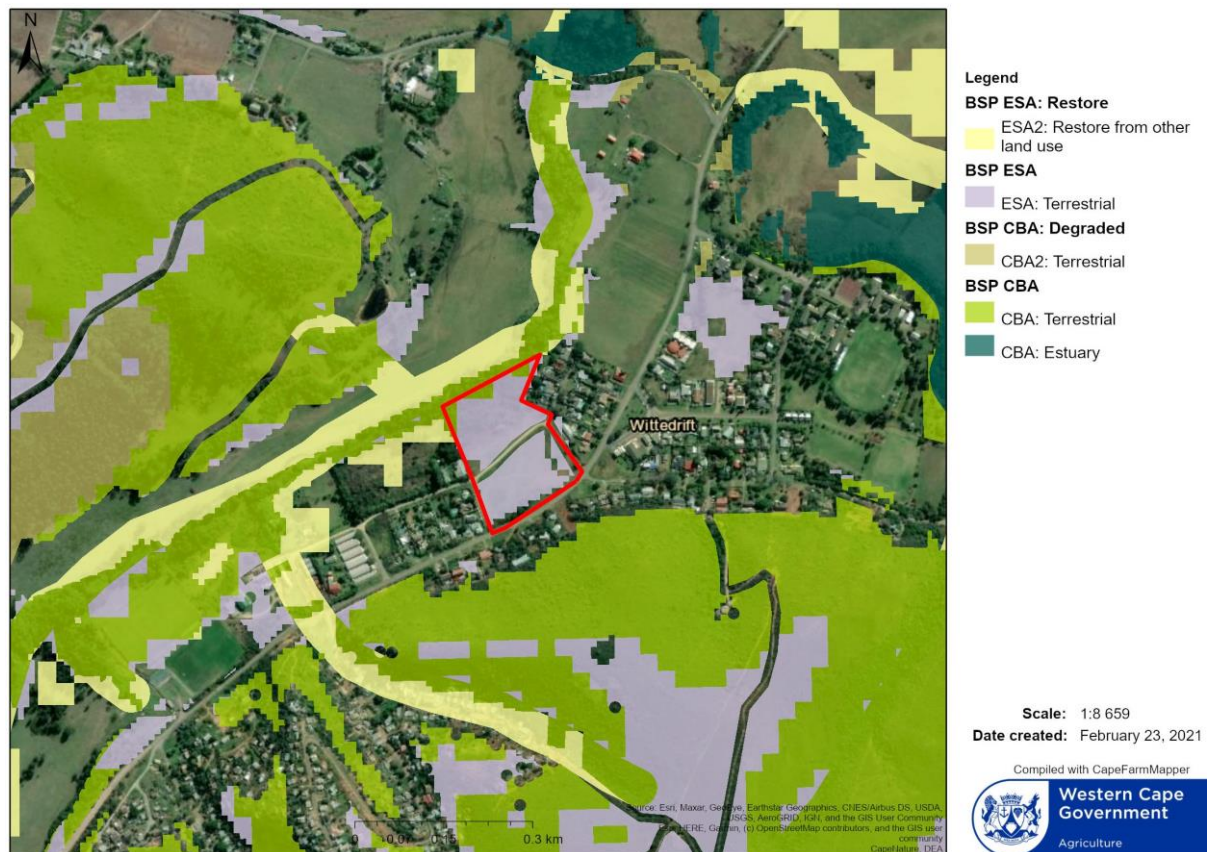


Map 3 Hydrology map with the study site outlined in red.

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*".

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 remaining.



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

Outcome of the Screening Report

Animal species, plant species and terrestrial biodiversity sensitivities, as per the Screening Report, are summarised below:

Animal species sensitivity

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity	Feature(s)
Medium	Amphibia-Afrivalus knysnae
Medium	Insecta-Aloeides pallida junio
Medium	Mammalia-Philantomba monticola
Medium	Reptilia-Tetradactylus fitzsimonsi

Medium	Sensitive species 1
Medium	Insecta-Aloeides thyra orientis
Medium	Sensitive species 6

Plant species sensitivity

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity	Feature(s)
Medium	Selago burchellii
Medium	Sensitive species 466
Medium	Ruschia duthiae
Medium	Sensitive species 273
Medium	Erica glandulosa subsp. fourcadei
Medium	Erica glumiflora
Medium	Sensitive species 287
Medium	Pterygodium cleistogamum
Medium	Acmaenia alternifolia
Medium	Muraltia knysnaensis
Medium	Leucospermum glabrum
Medium	Lampranthus pauciflorus

Terrestrial biodiversity sensitivity

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity	Feature(s)
Very High	Vulnerable ecosystem
Very High	Ecological Support Area 2
Very High	Ecological Support Area 1
Very High	Critical Biodiversity Area 1
Very High	Freshwater ecosystem priority area quinary catchments

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

Sensitive fauna species:

- The site proposed for the development (outside the river corridor and main wetland area) is highly degraded/transformed and considered to be a poor habitat for indigenous fauna, except for maybe insect fauna. Its position inside an urban context largely surrounded by houses, further supports the statement.
- With regards to the sensitive species listed in the Screening Report, the following: The site falls within the distribution area of Knysna banana frog (*Afrixalus knysnae*), which is endangered and an inhabitant of temperate forests, fynbos areas and wetlands. Its presence in the larger area is therefore a possibility, but it may be sensitive to disturbed habitats such this one! Blue duiker (*Philantomba monticola*) has been observed further away to the east, north of Nature's Valley and the N2 in the Garden Route National Park. It is not likely to frequent the site. The site lies outside the normal

distribution areas for the other species. *Tetradactylus africanus*, a vulnerable lizard species, is known from Storms River eastwards along the coast. With regards to the two butterfly species, *Aloeides thyra* ssp *orientis* is found between Still Bay and Knysna, while *A. pallida* ssp *juno* is found between Nature's Valley and Kareedouw.

- Given the above, it is recommended that the sensitivity be amended to Low or Low-medium.

Sensitive plant species:

- 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 species. 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.
- With regards to the sensitive species listed in the Screening Report, the following: *Selago burchellii*, *Erica glandulosa* ssp *fourcadei*, *E. glumiflora* (sand dunes) and *Lampranthus pauciflorus* are more coastal species. In other words, they are more abundant in habitats directly adjacent to the shoreline. *Ruschia duthiae* is an endemic vygie found mainly between Wilderness and Knysna. *Pterygodium cleistogamum*, *Acmadenia alternifolia* (recorded on the hilltops west of Wittedrift), *Muraltia knysnaensis* and *Leucospermum glabrum* are fynbos species found on more elevated, hilly areas. The presence of any of these species in the immediate area of the site is unlikely.
- 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.
- Given the above, it is recommended that the sensitivity be amended to Low.

Sensitive biodiversity:

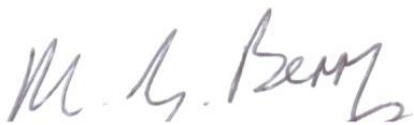
- As stated earlier, the site forms part of the larger Plettenberg Bay (Bitou) biodiversity network. It encroaches slightly onto a mapped terrestrial CBA, which is probably not correct since the latter comprises an aquatic feature (Bosfontein River). The majority of the site has been mapped as a terrestrial ESA. The reasons for this seem unsupported given the transformed state of the largest part of site (pasture). Outside the riverine and wetland area virtually no natural elements remain. The biodiversity (CBA) component of the site is therefore regarded as low to medium sensitive.

- 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.
- I am not sure why this is referred to 'biodiversity' as the definition of biodiversity refers to the sum of all living animals and plants. If it refers to the biodiversity (CBA) network map, it should be referred to that specifically.
- Given the above, it is recommended that the sensitivity be amended to Low or Low-medium.

Recommendations/conditions

As noted above, cognisance must 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. There is no need for monitoring of the impact of the development on terrestrial biodiversity, or any other conditions.

Prepared by:



Mark Berry Pr Sci Nat, PhD

References:

Manning, J. & Goldblatt, P. 2012. Plants of the Greater Cape Floristic Region 1: the Core Cape flora, *Strelitzia* 29. SANBI, Pretoria.

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.

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

Skinner, J.D. & Smithers, R.H.N. 1990. The mammals of the Southern African Subregion. University of Pretoria, Pretoria

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.

Woodhall, S. 2005. Field Guide to Butterflies of South Africa. Struik Nature, Cape Town.



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**

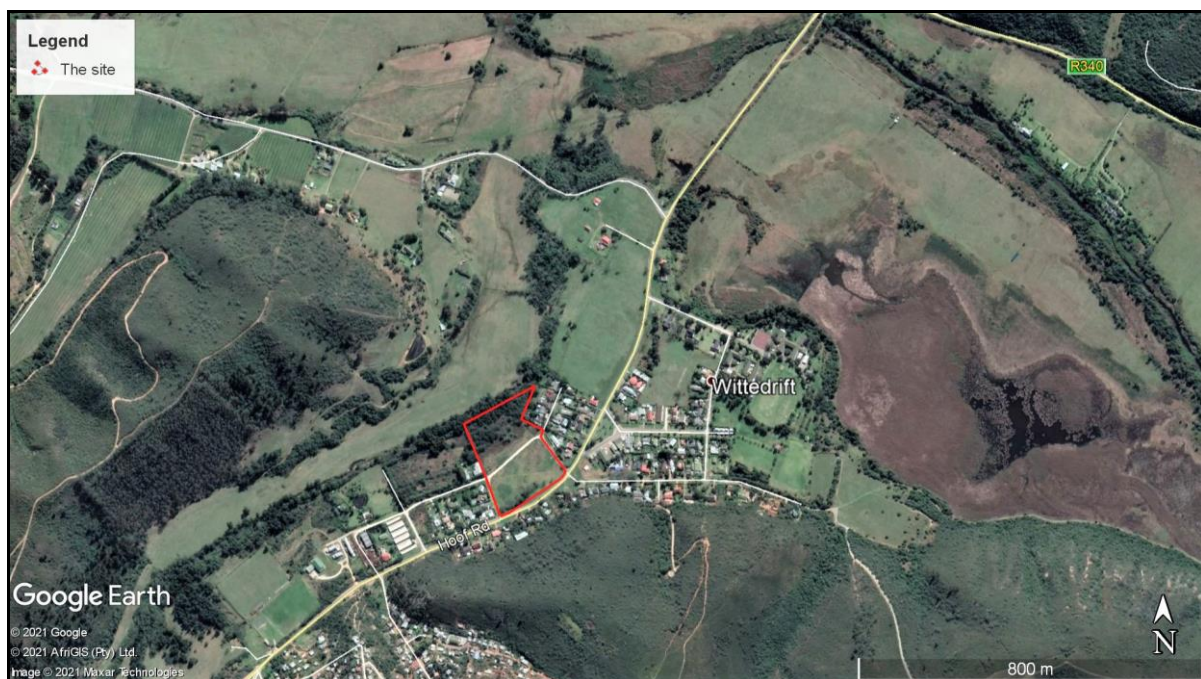
The compliance statement below was requested by Sharples Environmental Services, the appointed EAP. Mark Berry was appointed as an independent biodiversity specialist to prepare the statement (see CV and declaration of independence attached).

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

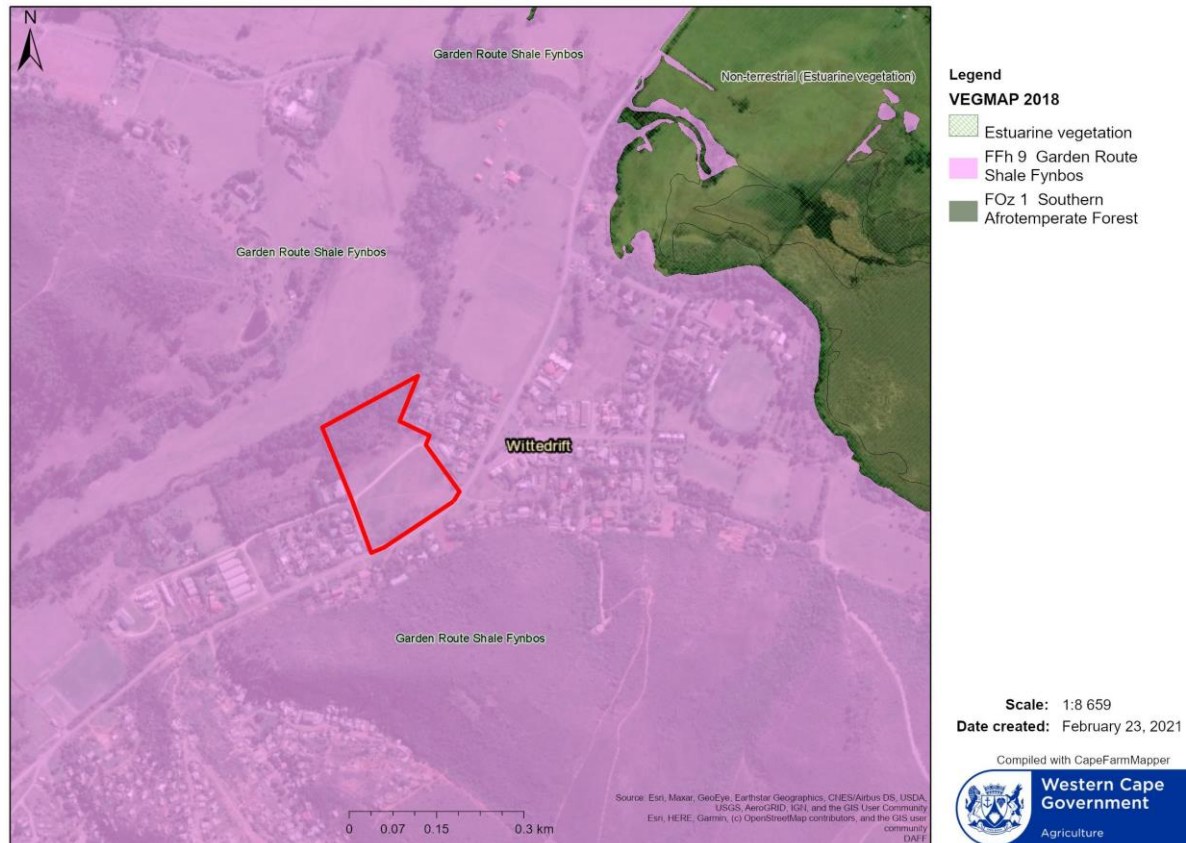
The site (3.6 ha) is located in Wittedrift, a small rural node 5 km northwest of Plettenberg Bay (see Map 1). It comprises a pasture and a floodplain/riverine portion.



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.

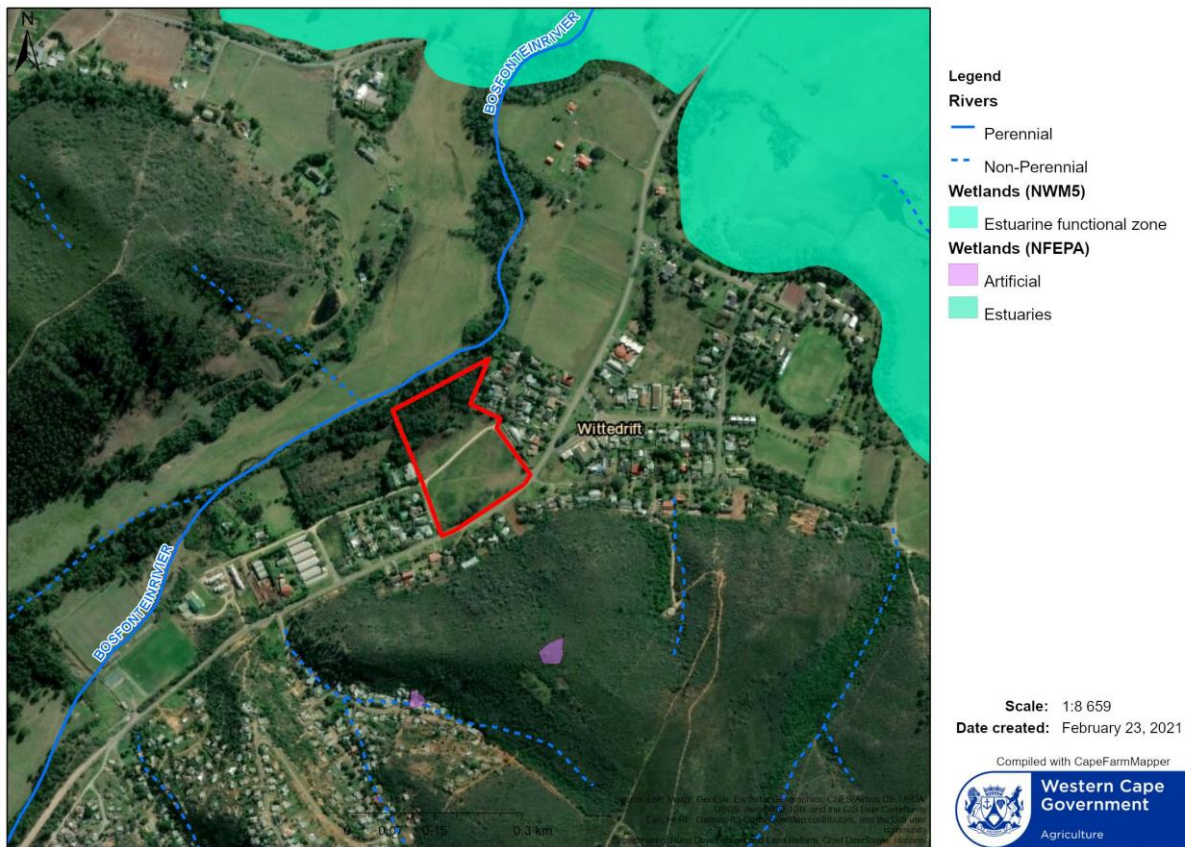
However, Google Earth (see Photo 1) and a photographic record (see attachment) and report supplied by Sharples Environmental Services (2019) suggest that the site is highly transformed and mostly covered by grasses. According to the above report, grass species such as kikuyu (*Pennisetum Clandestinum*) 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.

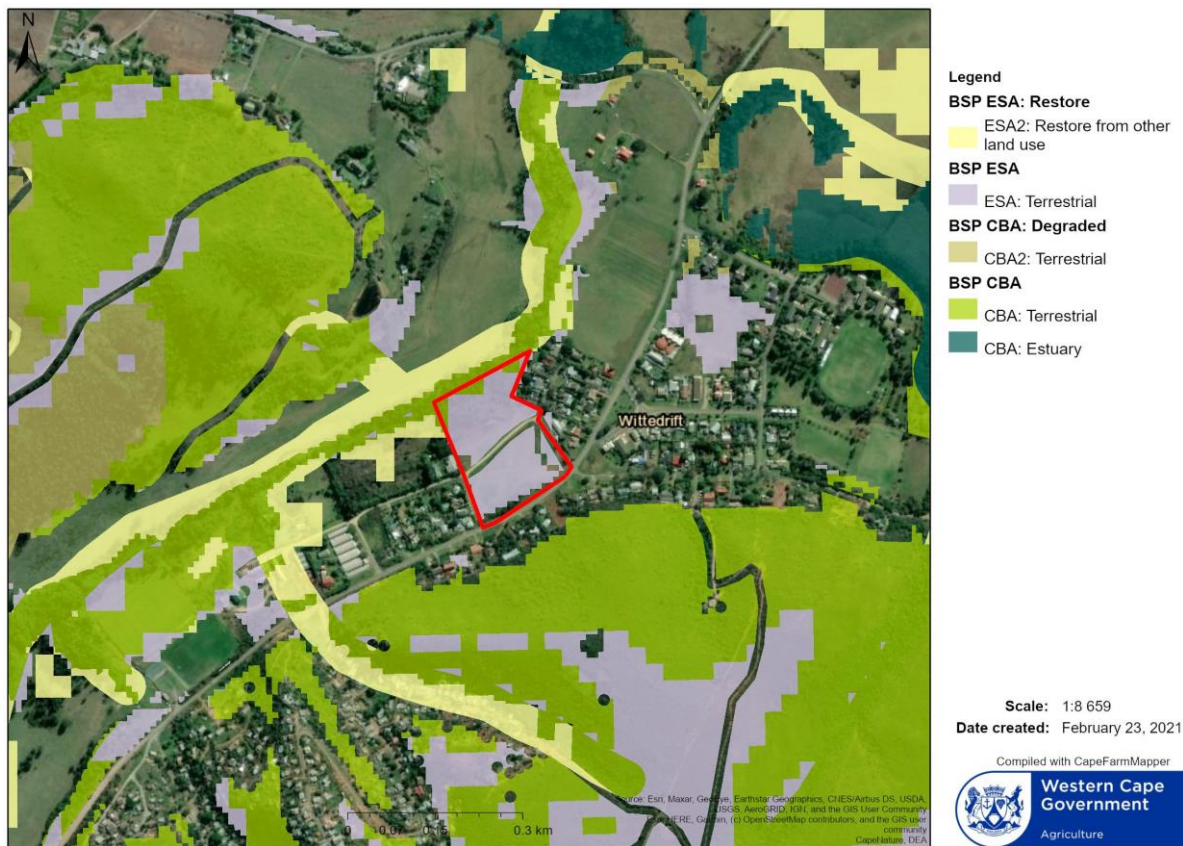


Photo 1 2011 Google Earth image of the site (outlined in red).



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

Address: 14 Alvin Crescent, Somerset West, 7130, Western Cape

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)

Phone: (021) 799-8660, e-mail: J.Manning@sanbi.org.za

Warren Manuel (Environmental Manager at Mossel Bay Municipality)

Phone: (044) 606-5163, e-mail: wmanuel@mosselbay.gov.za

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

Phone: (021) 555-0400, e-mail: acleghorn@knightpiesold.com

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