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Reference LE14/2/6/1/6/6/338&220-6_Linear Infrastructure_
Mossel Bay
date 19 June 2026

Sharples Environmental Services,
PO Box 443,
Milnerton,
7435

Attention: Ms Jessica Gossman
By email: jessica@sescc.net

Dear Ms Jessica Gossman

THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED REMOVAL AND REPLACEMENT OF EXISTING ROAD AND CULVERT INFRASTRUCTURE LOCATED ALONG DIVISION ROAD (DR) 1602 KM 8.48, KLEINPLAAS ROAD, CROSSING FARM 338 AND PORTION 6 OF FARM 220, MOSSEL BAY LOCAL MUNICIPALITY, WESTERN CAPE.

DEA&DP Reference: 16/3/3/1/D6/29/0022/26

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)¹ the areas adjacent to the proposed repair areas are Critical Biodiversity Areas (CBA 1&2: Terrestrial and Aquatic). According to the Vlok and de Villiers (2007)² fine scale maps the vegetation are classified as Moordkuils Perennial Stream, Wolwedans Grassy Fynbos, and Wolwedans Thicket Forest. According to the updated South African Vegetation Map (Beta VegMap, 2024)³, the vegetation is mapped as **Endangered** Garden Route Shale Fynbos and **Critically Endangered** Garden Route Granite Fynbos (NEM:BA, 2022)⁴.

The proposed project area traverses the Varings River, which is mapped as a channelled valley-bottom wetland ecosystem that is **Critically Endangered** and **Poorly Protected** (Van Deventer *et al.* 2019)⁵. Furthermore, the property falls within the Outeniqua National Strategic Water Source Area (SWSA) for surface water and the George and Outeniqua SWSA for

¹ CapeNature. 2024. 2023 Western Cape Biodiversity Spatial Plan and Guidelines. Unpublished Report

² Vlok JHJ, de Villiers R (2007) Vegetation Map for the Riversdale Domain. Unpublished 1:50 000 maps and report supported by CAPE FSP task team and CapeNature.

³ 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.

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 Van Deventer, H., van Niekerk, L., Adams, J., Dinala, M.K./ Gangat, R., Lamberth, S.J., Lötter, M., MacKay, F., Nel, J.L., Ramjukadh, C.J., Skowno, A., Weerts, S. 2019. National Wetland Map 5-An Improved Spatial Extent and representation of inland aquatic and estuarine ecosystems in South Africa.

groundwater. CapeNature has reviewed the application and provide the following comments and recommendations:

1. CapeNature notes that the proposed repair works are located within a highly sensitive landscape. While the proposed activity relates to the replacement of existing infrastructure, these biodiversity sensitivities require a precautionary approach and strict implementation of all specialist recommendations. Disturbance should therefore be limited to the minimum footprint required for construction, and all temporary disturbance areas must be rehabilitated following completion of the works.
2. Ongoing alien invasive vegetation clearing within disturbed areas and adjacent riparian habitat should be continuous throughout construction. The eradication of invasive alien vegetation must comply with the National Environmental Management: Biodiversity Act (Act 10 of 2004)⁶ and its associated Alien and Invasive Species Regulations⁷.
3. The site falls within both a Surface Water Strategic Water Source Area for the Outeniqua region and a Groundwater Strategic Water Source Area. These areas are nationally important for water security and ecosystem functioning. Construction activities should therefore be undertaken in a manner that minimises impacts on hydrological processes, water quality, and wetland functioning.
4. CapeNature notes the freshwater specialist's recommendation that disturbance associated with the temporary bypass road be minimised on the upstream side of the crossing, as these areas are considered more intact and ecologically sensitive. Attention should be given to the identified No-Go areas, tributary confluences, intact wetland habitat, and riparian vegetation. These areas should be clearly demarcated prior to construction and monitored throughout the construction phase.
5. Construction activities within and adjacent to the Varings River pose a risk to surface water quality through sediment mobilisation, concrete wash water, and other construction-related pollutants. Appropriate measures must be implemented to prevent contamination of the watercourse and associated wetland habitats.
6. CapeNature supports the freshwater specialist's recommendation for ecological rehabilitation, including the stabilisation of eroded banks, formalisation of road drainage outlets, removal of invasive alien vegetation, and wetland rehabilitation interventions where feasible.
7. Given the very high soil erodibility associated with the site, together with the presence of a Critically Endangered wetland system, erosion and sediment control measures should form a key component of the Environmental Management Programme. Particular attention should be given to temporary diversion works, bypass road construction, excavation within the watercourse, stockpiling of material, stabilisation of disturbed banks, and rehabilitation of all disturbed areas immediately following construction.
8. CapeNature understands that the proposed works within the watercourse will be authorised through the applicable General Authorisation in terms of Sections 21(c) and 21(i) of the National Water Act, 1998 (Act 36 of 1998)⁸. All conditions associated with the General Authorisation and specialist recommendations should be strictly adhered to.

⁶ National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004), Government Gazette No. 26436

⁷ Regulations under the National Environmental Management: Biodiversity Act (Act No. 10 of 2004): Alien and Invasive Species Regulations, Government Gazette No. 43735

⁸ National Water Act, 1998 (Act No. 36 of 1998). Government Gazette No. 19182.

9. An independent and suitably qualified Environmental Control Officer (ECO) must remain appointed for the full duration of construction and rehabilitation. CapeNature recommends that the ECO be familiar with all freshwater and botanical mitigation measures; oversee erosion management and sediment control measures; and monitor alien vegetation control and indigenous revegetation success.

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)