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Reference LE14/2/6/1/6/1/RE305-1_Estuarine_Plettenberg bay
date 11 February 2025

Eco Route Environmental Consultancy,
P.O. Box 1252,
Sedgefield,
6573

Attention: Ms Samantha Teeluckdhari
By email: samantha@ecoroute.co.za

Dear Ms Samantha Teeluckdhari

**THE PROPOSED STABILISATION OF A PORTION OF THE KEURBOOMS RIVER
EMBANKMENT SOUTH OF THE PLETTENBERG BAY ANGLING CLUB ON THE
REMAINDER I OF THE FARM HANGKLIP NO.305, BITOU LOCAL MUNICIPALITY,
WESTERN CAPE.**

DEA&DP Reference: I6/3/3/6/7/1/DI/3/0307/23

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 site is within Critical Biodiversity Areas (BA 1: Aquatic and CBA 2: Terrestrial). Furthermore, the site is within the Keurbooms Estuarine Functional Zone, which is poorly protected (Van Deventer *et al.* 2019)². The site is within the National Strategic Water Source Area for surface water for the Outeniqua region and serves as a water resource for the Keurbooms estuary.

The fine-scale vegetation map describes the vegetation as Wilderness estuary and Sedgefield Coastal Grasslands (Vlok *et al.* 2008)³. The National Biodiversity Assessment (Skowno *et al.* 2018)⁴ mapped the vegetation unit as Garden Route Shale Fynbos which is **Endangered** (NEM:BA, 2022)⁵. CapeNature has the following comments:

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

² 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.

³ Vlok JHJ, Euston-Brown DIW, Wolf T. 2008. A vegetation map for the Garden Route Initiative. Unpublished I: 50 000 maps and report for C.A.P.E. FSP Task Team, Oudtshoorn.

⁴ 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.

⁵ 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

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

1. The Spatial Development Framework for Bitou Municipality emphasizes that the estuary is a key focus area to preserve and encourage habitat connectivity. The proposed development will prevent this connectivity through habitat replacement. Furthermore, the IDP advocates for protection of environment; ecological corridor establishment; manage development along coastline using sustainable and precautionary principles.
2. The proposed infrastructure will increase downstream erosion as energy from flow events will be dissipated to adjacent areas of the installed infrastructure.
3. The proposed infrastructure does not promote natural functioning of the estuary bank or shore. There is no infrastructure supporting the estuary shore which need protection. Furthermore, the proposed infrastructure is not of a rehabilitation type as it will alter the habitat permanently.
4. The development objectives of the Estuarine Management Plan are poorly referenced and exclude the non-support of further marina developments, management of private land to prevent erosion (see boat activity removal impacts).
5. Removal of all boating activity to existing infrastructure on the applicant property would be more beneficial than any installed infrastructure.
6. The most impactful factor causing erosion is boating activities (landing), if they were removed, the erosion would be considered natural and acceptable due to the lack of infrastructure adjacent to the site. This application must consider that these activities are contribution to erosion.
7. The alternatives have not considered the removal of boating activities which are the primary cause for erosion of the riverbank. Neither has floating jetties been considered as an alternative with maximum of two bank anchoring sites, which would allow for natural rehabilitation of the bank and likely assist with lowering wave generated erosion. Also, a floating jetty would allow natural estuary littoral zone activities to continue. The applicant must consider these alternatives and not rely on high impact infrastructure.
8. It appears that the site is within the Coastal Public Property (CPP) and should therefore be considered against the principles of the CPP.

In conclusion, CapeNature does not support this application as the applicant did not consider soft option alternatives.

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)