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Reference LE14/2/6/1/6/1/304/91_Residential_Plettenberg Bay

date 09 May 2025

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

Attention: Ms Joclyn Marshall
By email: joclyn@ecoroute.co.za

Dear Ms Joclyn Marshall

THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT ON PORTION 91 OF FARM 304, KEURBOOMSTRAND, PLETTENBERG BAY, BITOU LOCAL MUNICIPALITY, WESTERN CAPE.

DEA&DP Reference: 16/3/3/6/7/1/D1/13/0268/22

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 has Critical Biodiversity Areas (CBA 1: Terrestrial, Aquatic, and CBA 2: Terrestrial).

The development footprint is within the 100m buffer for the Keurbooms Estuarine Functional Zone (Nel *et al.* 2011)², which is poorly protected (Van Deventer *et al.* 2019)³. Furthermore, the property is within the National Strategic Water Source Area for surface water for the Tsitikamma region and serves as a water source protection for the South Eastern Coastal Belt. The SWSA for the Tsitikamma region is of national importance and their ecological functioning must be protected and maintained (Le Maitre *et al.* 2018)⁴. Approximately 34.4% of the Tsitikamma SWSA is conserved within protected areas. Therefore, conserving the remaining areas and rehabilitating degraded areas are vital South Africa's water resources.

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 Unpublished Report

² 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.

³ 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.

⁴ Le Maitre, DC., Walsdorff, A., Cape, L., SeyAler, H., Audouin, M, Smith-Adao, L., Nel, J.A., Holland, M. and Witthüser. K. 2018. Strategic Water Source Areas: Management Framework and Implementation Guidelines for Planners and Managers. WRC Report No. TT 754/2/18. Pretoria: Water Research Commission.

The fine-scale vegetation map describes the vegetation as Sedgefield Coastal Grassland to the north and Keurbooms Thicket-Forest to the south (Vlok *et al.* 2008)⁵. According to the National Biodiversity Assessment (Skowno *et al.* 2018)⁶ the vegetation units are **Endangered** Garden Route Shale Fynbos (NEM:BA, 2022)⁷. Following a review of the dBAR and specialist study, CapeNature has the following comments:

1. The dBAR refers to the 2017 Western Cape Biodiversity Spatial Plan (hereafter WC BSP) as a Biodiversity Sector Plan, which it is not. The 2017 WC BSP is a comprehensive spatial tool that identifies biodiversity priority areas (i.e., CBA and ESA) and support sustainable development by ensuring that biodiversity considerations are integrated into decision-making processes. The 2017 WC BSP has been replaced by the 2023 WC BSP which was developed in accordance with the Western Cape Biodiversity Act (Act 6 of 2021)⁸.
2. It is understood that milkwood trees will be retained. As they are protected trees⁹ CapeNature recommend the department of Forestry, Fisheries, and Environment provide comments for this application. Furthermore, it is noted that the indigenous forest vegetation to the north, which has a Very High Site Ecological Importance (SEI) will therefore be excluded from the proposed development.
3. The proposed development is primarily located within pasture/lawn areas, which have a very low Site Ecological Importance (SEI). However, a portion extends into secondary vegetation with a medium SEI. In line with the mitigation hierarchy, avoidance—or at minimum, a reduction in housing units—should be applied in this area. We do not support development within the secondary vegetation, as the specialist’s report confirms that vegetation in this band is in a state of recovery. Additionally, this area is mapped as a CBA, where rehabilitation is the recommended management objective.
4. Most of the existing development is situated to the south of the site, while the surrounding area of the site has not been developed and is mapped as CBA forming a continuous ecological corridor. Although most the proposed development footprint is transformed, no attempt has been made to restore the vegetation. We therefore do not support the current preferred alternative. The specialist has indicated a preference for Alternative 1, which includes 73 housing units of 375 m² each; however, from a biodiversity perspective, Alternative 2 is more appropriate, as it allows for the rehabilitation of the remaining secondary vegetation habitat, which could then be incorporated into the broader CBA corridor. It is also important to note that the current layout may set a precedent for future development in adjacent, currently undeveloped areas.
5. How will potential human-wildlife interactions and conflicts be managed as part of this development?
6. The consultancy has approached CapeNature for inputs into the Conservation Management Plan, however the site has not been assigned a status yet and will only be presented at CapeNature’s Stewardship review committee meeting in June 2025. Once a

⁵ 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.

⁶ 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.

⁷ 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

⁸ Western Cape Biodiversity Act, 2021 (Act No. 6 of 2021). Western Cape Provincial Gazette No. 8529.

⁹ National Forest Act, 1998 (Act No.84 of 1988). The publication of the annual list of all tree species which are protected under Section 12 of the National Forest Act, 1998 (Act No. 84 of 1998). 2024. Government Gazette No. 50291

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

status has been assigned, CapeNature will provide input. The objective of natural CBA is to remain in a natural condition and therefore we support that the northern section be formally protected into the Western Cape Protected Areas Expansion Strategy.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Megan Simons', with a long horizontal flourish extending to the right.

Megan Simons
For: Manager (Conservation Intelligence)

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Reference LE14/2/6/1/6/1/304-91_Residential_Plettenberg Bay
Date 15 November 2024

Confluent Environmental (Pty) Ltd,
7 St. Johns Street,
Dormehls Drift,
George,
6529

Attention: Ms Nicola Fede
By email: nicola@confluent.co.za

Dear Ms Nicola Fede

THE WATER USE LICENCE APPLICATION SUMMARY REPORT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT FOR PORTION 91 OF FARM 304, MATJIESFONTEIN, PLETTENBERG BAY, BITOU LOCAL MUNICIPALITY, WESTERN CAPE.

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 (Pool-Stanvliet *et al.* 2017)¹ the property has Critical Biodiversity Areas (CBA 1: Forest, Terrestrial, Aquatic; CBA 2: Forest, Terrestrial). The development footprint is within the Keurbooms Estuarine Functional Zone (Nel *et al.* 2011)², which is poorly protected (Van Deventer *et al.* 2019)³. Furthermore, the property is within the National Strategic Water Source Area for surface water for the Tsitikamma region and serves as a water source protection for the South Eastern Coastal Belt.

According to Vlok and de Villiers (2007)⁴ fine scale vegetation maps the area is described as Sedgfield Coastal grassland and Keurbooms Thicket-Forest. According to the National Biodiversity Assessment (Skowno *et al.* 2018)⁵ the vegetation units are **Endangered** Garden

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

² 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.

³ 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.

⁴ 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.

⁵ 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.

Route Shale Fynbos (NEM:BA, 2022)⁶. Following a review of the Water Use Licence Application and Aquatic Biodiversity Impact Assessment. CapeNature has the following comments:

1. The proposed development must be guided by the management objectives of CBAs as set-out in the WCBSPP handbook (Pool-Stanvliet *et al.* 2017). The applicant is therefore reminded of the importance of maintaining CBA connectivity and ensuring that the scope of work does not negatively impact these CBAs across the landscape.
2. In terms of section 15(1) of the National Forests Act⁷, no person may cut, disturb, damage, or destroy any protected tree or possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree except under a license granted by the Minister. Therefore, CapeNature recommend the department of Forestry, Fisheries, and Environment provide comments for this application.
3. The property has coastal habitat which is an element of ecological infrastructure, and these areas should remain in a functional structure and composition for biodiversity. These areas play an important role in landscape connectivity, as well as supporting the functioning of PAs or CBAs. These corridors represent the best option for promoting resilience to climate change and the persistence of biodiversity as they provide pathways for the movement of plants and animals in response to environmental change. They also support the natural movement of species between populations to ensure population viability (Pool-Stanvliet *et.al.* 2017).
4. The property is within an important hydrological area and should be managed to maintain and improve the current condition. The SWSA for the Tsitsikamma region is of national importance and their ecological functioning must be protected and maintained (Le Maitre *et al.* 2018)⁸. Approximately 34.4% of the Tsitsikamma SWSA is conserved within protected areas. Therefore, conserving the remaining areas and rehabilitating degraded areas are vital South Africa's water resources.
5. Eradication of invasive alien plant species are of high priority and alien plant species that occur outside of the proposed footprint must be cleared during the alien clearing phase. In this way, more alien plant species can be removed. The eradication and monitoring of the spread of invasive alien species should follow the National Environmental Management: Biodiversity Act (Act No.10 of 2004)⁹.
6. In terms of the development layout a clustered development is preferable as this would allow for better management of ecological processes such as fire. The Fynbos Forum Guidelines¹⁰ references that the impacts of developments must be minimised, buildings should be clustered within fire-free zones and protected with firebreaks. Furthermore, flammable building materials must be avoided.
7. In terms of section 12 (1) and 2 (a) of National Veld and Forest Act¹¹ adequate firebreaks must be prepared and maintained around the property to reasonably prevent the spread of unwanted fires in the area. CapeNature recommend that the owner, if not registered yet, apply for membership with the Southern Cape Fire Protection Association (SCFPA). Furthermore, a fire management plan must be compiled.

⁶ 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

⁷ National Forest Act, 1998 (Act No. 84 of 1998). 1998. Government Gazette No. 19408.

⁸ Le Maitre, DC., Walsdorff, A., Cape, L., SeyAler, H., Audouin, M, Smith-Adao, L., Nel, J.A., Holland, M. and Witthüser. K. 2018. Strategic Water Source Areas: Management Framework and Implementation Guidelines for Planners and Managers. WRC Report No. TT 754/2/18. Pretoria: Water Research Commission.

⁹ Government Gazette No. 37885, GN No. R. 598 (2014) National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) Alien and Invasive Species Regulations, 2014.

¹⁰ De Villiers C.C., Driver A., Clark B., Euston-Brown D.I.W., Day E.G., Job N., Helme N.A., Holmes P.M., Brownlie S. and A.B. Rebelo (2016). Ecosystem Guidelines for Environmental Assessment in the Western Cape, Edition 2. Fynbos Forum, Cape Town.

¹¹ National Veld and Forest Act 1998 (Act 101 of 1998) Government Gazette: 19515

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8. A conservation management plan must be developed for the open space area to the north. Furthermore, how will the pond and 10 m buffer (including the vegetation) be protected in the long term?
9. Fencing was not recommended along the green corridor and the proposed residential development. So, how will human-wildlife interactions/ conflict be managed?
10. In terms of the proposed development CapeNature reminds the applicant that rehabilitation of degraded areas is also an option in the mitigation hierarchy which should be considered to compensate for impacts.

In conclusion, CapeNature needs to review all alternatives as the Aquatic Biodiversity Impact Assessment only discussed the preferred site development plan. Furthermore, we require assessments for the Terrestrial Biodiversity (i.e., plants, animals, and the impact on the CBAs).

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Megan Simons', with a stylized flourish extending to the right.

Megan Simons
For: Manager (Conservation Intelligence)