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Reference LE14/2/6/1/6/1/444-38_Residential_Plettenberg bay
Date 19 March 2024

Cape Environmental Assessment Practitioners,
P.O.Box 2070,
George,
6530

Attention: Mr Francois Byleveld
By email: francois@cape-eaprac.co.za

Dear Mr Francois Byleveld

THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE KEURBOOMS LIFESTYLE VILLAGE ON PORTION 38 OF FARM GANSE VALLEI NO. 444, PLETTENBERG BAY, BITOU LOCAL MUNICIPALITY, WESTERN CAPE.

DEA&DP reference: 16/3/3/6/7/1/DI/6/0121/22

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 (Pool-Stanvliet *et al.* 2017)¹ the property has Critical Biodiversity Areas (CBA 1: Aquatic; Estuary) and Ecological Support Areas (ESA 2: Restore). The east of the property is within the Estuarine Functional Zone of the Keurbooms², which is poorly protected³.

According to Vlok and de Villiers (2007)⁴ fine scale vegetation maps the area is described as Wilderness Forest-Thicket and Sedgfield Coastal Grassland. The National Biodiversity Assessment (Skowno *et al.* 2018)⁵ mapped the vegetation units as Garden Route Shale Fynbos

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 Unpublished 1:50 000 maps and report supported by CAPE FSP task team and CapeNature.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.

which is **Endangered** (NEM:BA, 2022)⁶ and Goukamma Dune Thicket which is Least Concerned (SANBI 2022)⁷.

Following a review of the PreApp dBAR and specialist studies, CapeNature wishes to make the following comments:

1. The property is within a climate change corridor 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).
2. The proposed development should not have a negative impact on the climate corridor as climate change impacts such as storm events, fires and floods must be considered.
3. The property has a listed protected tree⁸ species which will be avoided. CapeNature reminds the applicant that in terms of section 15(1) of the National Forests Act⁹, 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.
4. The property has an existing dwelling, and the development is proposed within EN and LC vegetation. The CBA is mapped to the east and must be demarcated as a No-Go area.
5. CapeNature does not support development on steep slopes with a gradient that is greater than 1:4. As the soil erodibility is high, we remind the applicant that the geology could become unstable during vegetation removal and heavy rainfall events may also exacerbate the soil condition.
6. The proposed development should not have a negative impact on the climate corridor as climate change impacts such as storm events, fires and floods must be considered.
7. Fynbos is a fire-maintained ecosystems and fire plays an important role in determining species composition and community type. Thus, the low species richness is an indication the property has not been managed in terms of fire. The exclusion of fire from certain habitats will be considered unacceptable as this may ultimately cause the loss of fynbos species (Mucina and Rutherford 2006)¹⁰.
8. The specialist concluded that he did not find any plant species of conservation concern but there is a potential for these species to occur. The specialist did not include any mitigation measures if these species were found on site. CapeNature would recommend the undertaking of walk-throughs (during the correct season) before construction commences to determine whether any SCC are present or not.

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 Government of South Africa (2022) South African Red List of Terrestrial Ecosystems: assessment details and ecosystem descriptions. Technical Report #7664, SANBI Pretoria, South Africa.

⁸ Notice of the List of Protected Tree Species under the National Forest Act, 1998 (Act No. 84 of 1998).

⁹ National Forest Act, 1998 (Act No. 84 of 1998). 1998. Government Gazette No. 19408.

¹⁰ Mucina, L. & Rutherford, M. C. (EDS) 2006. The Vegetation of South Africa, Lesotho and Swaziland. Strelitzia 19. South African National Biodiversity Institute, Pretoria. (revised 2012)

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Associate Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Loubser, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack

9. Ecological corridors were not included which is concerning as having corridors for animal movement is important for conserving biodiversity.
10. CapeNature supports the removal of invasive alien vegetation, and we recommend aliens outside of the proposed area, also be removed during the alien clearing phase. Removal of invasive alien plant species should be compliant with the National Environmental Management: Biodiversity Act (Act No.10 of 2004)¹¹.
11. The Fynbos Forum Guidelines¹² state that the impacts of housing developments must be minimised, buildings should be clustered within fire-free zones and protected with firebreaks. Furthermore, flammable building materials should be avoided. Furthermore, in terms of section 12 (1) and 2 (a) of National Veld and Forest Act¹³ an adequate firebreak must be prepared and maintained around the property to reasonably prevent the spread of unwanted fires in the area.

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)

¹¹ 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.

¹² 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.

¹³ National Veld and Forest Act 1998 (Act 101 of 1998) Government Gazette: 19515

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