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**Reference** LE14/2/6/1/6/1/ERF 6503\_Estuarine\_  
Plettenberg bay  
**Date** 21 February 2024

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

Attention: Mr Francois Byleveld  
By email: [francois@cape-eaprac.co.za](mailto:francois@cape-eaprac.co.za)

Dear Mr Francois Byleveld

**THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE PLETT  
LAGOON ESTATE ON THE REMAINDER OF ERF 6503, PLETTENBERG BAY,  
BITOU LOCAL MUNICIPALITY, WESTERN CAPE.**

**DEA&DP reference: 16/3/3/6/7/1/D1/13/0177/23**

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 (Pool-Stanvliet *et.al.* 2017)<sup>1</sup> the property has natural Critical Biodiversity Areas (CBA 1: Terrestrial; Aquatic; Estuary) to the east, degraded CBA to the west, and natural Ecological Support Areas (ESA 1: Terrestrial) to the northwest. The east of the property is within the Estuarine Functional Zone of the Keurbooms<sup>2</sup>, which is poorly protected<sup>3</sup>.

According to Vlok and de Villiers (2007)<sup>4</sup> fine scale vegetation maps the area is described as Dune Thicket Mosaic Forest and Coastal Solid. According to the National Biodiversity Assessment

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

<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> 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 Unpublished 1:50 000 maps and report supported by CAPE FSP task team and CapeNature.

(Skowno *et al.* 2018)<sup>5</sup> the vegetation is Garden Route Shale Fynbos which is **Endangered** (NEM:BA, 2022)<sup>6</sup> and Goukamma Dune Thicket which is Least Concerned (SANBI 2022)<sup>7</sup>.

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 property has a listed protected tree<sup>8</sup> species which will be avoided. CapeNature reminds the applicant that in terms of section 15(1) of the National Forests Act<sup>9</sup>, 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.
3. It is understood that the development will be in the degraded CBA. The proposed developed site has an existing building. An existing public road will be used to gain access thus new roads are not proposed.
4. According to the specialist the proposed development area has been grazed historically which has transformed the vegetation. Furthermore, the proposed site is already surrounded by developments.
5. The remainder of the property will be zoned to Open Space Zone III which will not be developed. CapeNature supports the recommended 30 m wetland buffer. Furthermore, as the entire delineated wetland area will be avoided any access through this area must be controlled.
6. It is important to note that the Keurbooms estuary is one of five natural/ unmodified estuaries in the Western Cape (Clark, 2016)<sup>10</sup>. The Open Space area will improve protection to the estuary. Conserving the estuary is in line with the objectives of CBA, Keurboom EMP and the Western Cape Protected Areas Expansion Strategy. Therefore, CapeNature would support the zoning of Open Space Zone III.

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<sup>5</sup> 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.

<sup>6</sup> 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

<sup>7</sup> Government of South Africa (2022) South African Red List of Terrestrial Ecosystems: assessment details and ecosystem descriptions. Technical Report #7664, SANBI Pretoria, South Africa.

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

<sup>9</sup> National Forest Act, 1998 (Act No. 84 of 1998). 1998. Government Gazette No. 19408.

<sup>10</sup> Clark, B. (2016). 'Coastal Ecosystems: estuaries', in Cadman, M. (ed.) *Ecosystem Guidelines for Environmental Impact Assessment in the Western Cape, Edition 2*. Cape Town: Fynbos Forum, pp 80-87.

7. The Open Space can be beneficial for the residents to learn, value and respect nature. If any boardwalks are planned this must be assessed in detail as this area has natural CBA and is near the Keurbooms estuary. Furthermore, trampling, litter and dumping must be prohibited. The buffer area must not be compromised by the proposed development as maintaining connectivity to the open space is important to maintaining its biodiversity.
8. 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)<sup>11</sup>.
9. Any waste and rubble must be removed from the development site and surrounding area. Waste generated must be stored on site until it is removed to a registered facility.
10. The Environmental Control Officer (ECO) should oversee the construction phase to minimise any negative impacts to the environment. Furthermore, the ECO must ensure the recommendations and mitigation measures are strictly implemented.

In conclusion, the impact of the proposed development on biodiversity and ecological processes must be minimized. The remaining vegetation to the east will be conserved and zoned to Open Space Zone III and should be managed according to the objectives of CBAs. Coastal biodiversity must be protected as it maintains coastal corridor movement.

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)**

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<sup>11</sup> 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.

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