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Reference LE14/2/6/1/6/2/195-371_Residential_
Kraaibosch
Date 11 June 2024

HillLand Environmental,
P.O. Box 590,
George,
6530

Attention: Mr Stefan Delpont
By email: environmental@hilland.co.za

Dear Mr Stefan Delpont

THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE KRAAIBOSCH PARK, GEORGE 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 site degraded Critical Biodiversity Areas (CBA 2: Forest and Terrestrial) and a minor section of degraded Ecological Support Areas (ESA 2: Restore) is mapped towards the southern corner. The Modderug River flows along the southern boundary. The site is within the National Strategic Water Source Area (SWAS) for surface water for the Outeniqua region and serves as a water sources protection for the Kaaimans River and Watercourse protection for South Eastern Coastal Belt.

According to Vlok and de Villiers (2007)² fine scale vegetation maps the area as Wolwedans Grassy Fynbos and Groot Brak River Floodplain. According to the National Biodiversity Assessment (Skowno *et al.* 2018)³ the vegetation unit is Garden Route Granite Fynbos which is **Critically Endangered** (NEM:BA, 2022)⁴. CapeNature wishes to make the following comments:

- I. Degraded CBAs should be maintained in a functional state with no further loss of habitat. It is noted that this site already has environmental authorisation and is surrounded by

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

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 Unpublished 1:50 000 maps and report supported by CAPE FSP task team and CapeNature.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

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

residential development. The management of the open space areas can be guided by the management objectives of CBAs as set-out in the WCBSP handbook (Pool-Stanvliet *et al.* 2017). The only opportunity for landscape connectivity is the watercourse to the south.

2. The SWSA for the Outeniqua region is of national importance and their ecological functioning must be protected and maintained (Le Maitre *et al.* 2018)⁵. The property is within an important hydrological area therefore the smaller stream networks need to be managed especially the quality to ensure downstream ecosystems are not negatively affected. Furthermore, the Environmental Control Officer should ensure the aquatic buffers are implemented.
3. Soil erosion control measures, water and pollution run-off must be strictly implemented. All runoffs must be managed in a manner as to minimise or prevent erosion. Areas susceptible to erosion and areas cleared of indigenous vegetation must be protected by installing the necessary temporary structures.
4. Invasive alien species have numerous negative impacts on ecosystem functioning. Removal of invasive alien plant species should be compliant with the National Environmental Management: Biodiversity Act (Act No.10 of 2004)⁶. Furthermore, we recommend aliens outside of the proposed area, also be removed during the alien clearing phase.

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)

⁵ 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.

⁶ 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**

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