

SCIENTIFIC SERVICES

postal Private Bag X5014 Stellenbosch 7599
physical Assegaibosch Nature Reserve
Jonkershoek Road, Jonkershoek
website www.capenature.co.za
enquiries Philippa Huntly
telephone +27 21 866 8000 **fax** +27 21 866 1523
email phuntly@capenature.co.za
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Euonell Visage
Guillaume Nel Environmental Consultants
45 Fabriek Street
Paarl
7646

By email: eg@gnec.co.za

Dear Euonell,

RE: CapeNature comment on the proposed mixed use development on erven 13480 and 21128, Paarl, Draft Basic Assessment Report.

CapeNature would like to thank you for the opportunity to comment on the above application and wish to make the following comments:

1. Erven 13480 and 21128 are located within the urban area of Paarl and the proposed mixed use development will comprise approximately 165 single residential units, 371 duplexes, 5 commercial and residential mixed use buildings and 3 community facilities; public open spaces and public roads. The entire property is approximately 13ha.
2. The Western Cape Biodiversity Spatial Plan of 2017 indicates an Ecological Support Area (ESA) running along the western border of erf 21128 and through the central part of erf 13480 and part of the central part of erf 21128. These are correctly reflected in the biodiversity overlay maps in Addendum D of the main report and in the botanical report. There are no CBAs mapped on or near this site.
3. In terms of botanical impacts, Boland Granite Fynbos is mapped as the natural vegetation which would have originally extended across this site. This vegetation type is classified as Vulnerable according to criteria A1 (Irreversible loss of natural habitat) and D1 (Threatened plant species associations). A Botanical Assessment was completed and the associated report has been supplied and used to inform the DBAR. The botanical assessment found some indigenous plants on the site including: *Babiana* sp. *Gladiolus* sp. and *Lachenalia* sp. The botanical assessment found no Species of Conservation Concern. In general the conditions were found to be highly transformed from the original state being partially cleared, used for illegal dumping and partially invaded by exotic species. The botanical report concludes that the site does not represent the originally occurring vegetation type (Boland Granite Fynbos). It is noted that linkage to natural vegetation is very limited as the surrounding land use comprises largely built environment, roads (N1 and R101) and agriculture. The botanical report rates the

conservation value of the study area as Low and the rehabilitation potential Very Low. The recommendation in the botanical report that, should the development go ahead, a thorough 'search and rescue' should be undertaken to translocate all suitable species (bulbs) to a suitable receptor site is supported. This must be done under the guidance of a suitably qualified specialist.

4. Given the above there is no objection from CapeNature to the proposed development.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received. Please note that our comments pertain only to the biodiversity related impacts and not to the overall desirability of the application.

Yours sincerely



Philippa Huntly For: Manager (Scientific Services)