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date 8 September 2017

Guillaume Nel Environmental Consultants
P.O. Box 2632
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Attention: Renier Kapp
By email: renier@gnec.co.za

Dear Renier

Pre-Application Basic Assessment Report for the Proposed Haasendal Development and Kuils River Golf Course Re-Development on Erven 23580, 23579, 23582, 23583 and 23584, Farm 1339 and Portions 60, 64, 67, 87 and 106 of Farm 222, Kuils River, Cape Town
(DEA&DP ref: 16/3/3/6/7/1/A5/11/2082/17)

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

The proposal forms part of the larger Haasendal development undertaken by the applicant and now incorporates the Kuils River Golf Course within the development. CapeNature is aware that there have been several applications and amendment applications relevant to this development going back over 10 years, including bulk infrastructure applications. It would be useful to include a description of the various applications that have taken place as well as the timeline and spatial extent. This will allow for greater clarity in terms of the process to date and eliminate any uncertainties related to this application.

Within the areas that are relevant to this application, most are classified as No Natural according to the Western Cape Biodiversity Spatial Plan and Biodiversity Network for the City of Cape Town, with the south western corner south of Bottelary River classified as Critical Biodiversity Area (CBA): Degraded and CBA 2 respectively, and the south eastern corner south of the Bottelary River classified as Ecological Support Area (ESA): Restore and Other ESA respectively. The vegetation types that would have occurred across the site would have consisted mainly of Cape Flats Sand Fynbos interspersed with patches of Swartland Granite Renosterveld, both of which are listed as Critically Endangered.

Several wetlands are mapped on the site according to the BioNet, both natural/semi-natural and artificial. The Bottelary River flows through the centre of the site in a westerly direction. The freshwater specialist study included a wetland delineation, which differs from the mapping of the BioNet. The wetlands delineated are associated with the Bottelary River and a tributary to the north west. Some of the wetlands on the BioNet are artificial irrigation ponds on the golf course. The wetland in the north is now occupied by the Turnberry component of the development which was subject to a separate application and approval.

There is however also a wetland on the southern section which is not included in the freshwater specialist study.

The freshwater specialist study recommends that the freshwater environment on site has been significantly modified through various impacts, and provided that a 30 m buffer is observed from the Bottelary River and a 10-15 m buffer from the tributaries, the impacts can be considered acceptable. The study also recommends that the stormwater management plan has taken into consideration the freshwater constraints and is supported from the aquatic ecosystem perspective.

CapeNature supports the findings of the freshwater specialist study. However, further evaluation of the mapping of the wetlands on the BioNet is required, in particular the wetland mapped to the south of the Bottelary River. The other differences consist of refinements of mapping or can be inferred as discussed above.

The environmental management plan has included a river maintenance management plan and rehabilitation plan, with the focus on the Bottelary River, which is supported and must be implemented. As the river corridor is transformed along most of its length, this plan is sufficient and there is no need for full habitat restoration.

A botanical assessment has been included that was conducted in 2007 for the initial development proposal. It should be noted that the botanical assessment only covers the western and central sections of the current development proposal and does not include the eastern section classified as ESA.

The botanical assessment identified that the majority of the site was previously ploughed and of low conservation value, apart from a thicket patch identified in the central section. This would suggest that the area classified as CBA is not supported by the botanical specialist. It should further be noted that there do not appear to have been any changes since 2007 to suggest that any of the areas have improved in the conservation value e.g. successful restoration actions.

The Basic Assessment Report states that the thicket patch has been removed. Further explanation is required in this regard, as this is not supported. Based on Google Earth imagery this appears to have occurred between 2008 and 2009.

The south eastern section of the proposed development abuts on to the Haasendal Conservation Area. The Standard Operating Procedure: Guidelines for New Developments adjacent to Conservation Areas issued by the City of Cape Town Environmental and Heritage Resources Management Department (April 2013) must be referred to in the detailed design for this section of the development. In particular, it is preferred that a road abuts on to conservation area as this minimizes undesirable negative edge effects on the conservation area such as waste dumping.

In conclusion, CapeNature does not object to the proposed development provided the concerns above are addressed. In summary, the freshwater specialist study should provide further explanation regarding the wetlands as mapped on the BioNet. An additional botanical specialist study should be undertaken for the south eastern section mapped as ESA. It is likely that this area contains similar vegetation to the remainder of the site, however further evidence is required. An explanation of the removal of the thicket patch is required.

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 'Rhett Smart', with a long horizontal flourish underneath.

Rhett Smart
For: Manager (Scientific Services)