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reference SSD14/2/6/1/4/4/222-15_residential_Brackenfell
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Guillaume Nel Environmental Consultants
P.O. Box 2632
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Attention: Carina Nel
By email: carina@gnec.co.za

Dear Carina

Draft Basic Assessment Report for the Proposed Residential Development on Portion 15 of Farm 222, Brackenfell, Cape Town
(DEA&DP ref: 16/3/3/6/7/1/A5/11/2140/17)

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.

According to the Western Cape Biodiversity Spatial Plan and the Biodiversity Network for the City of Cape Town, the site is classified as No Natural. There are no wetlands or watercourses mapped on the site, however there is an artificial dam located along the western boundary associated with a watercourse.

The site photographs and contents of the Draft Basic Assessment Report confirm that there is no natural vegetation remaining on the site, having been completely transformed through agricultural and recreational activities. CapeNature is therefore satisfied that there is no significant impact on terrestrial biodiversity.

A freshwater ecosystem assessment was undertaken and indicates that there is a stormwater swale located in the north-western section of the site which links the stormwater channel located north of the development to the stormwater pond/dam located west of the site as referred to above.

It should be noted that the freshwater ecosystems assessment does require further clarity regarding certain issues. A seepage wetland is described located directly south of the property, which was not identified on the desktop mapping. This feature has not however been mapped or discussed further in the assessment. There is a feature visible on the Google Earth imagery which is assumed to be this feature, and appears to be located in the road reserve of the Bottelary Road (M23).

Reference is made to a pipeline that transports stormwater from the above-ground stormwater channel north of the site to the stormwater pond to the west of the site. It is assumed that the swale then only transports stormwater from the subject property to the stormwater pond. It is evident that the swale does not contain wetland vegetation, but only acts as a conduit for run-off during rainfall events. More detail should however be provided.

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

Board Members: Ms Merle McOmbring-Hodges (Chairperson), Dr Colin Johnson (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Bruce McKenzie, Adv Mandla Mdludlu, Mr Danie Nel, Prof Aubrey Redlinghuis, Mr Paul Slack, Prof Kamilla Swart-Arries

It is noted however that the freshwater ecosystems assessment indicates that stormwater stream was flowing at this time of the site visit. It is assumed that this is referring to the stormwater channel located to the north of the site. The report needs to make clearer distinctions between the stormwater channel to the north of the site, the underground stormwater pipe and the swale located on the site.

The stormwater management plan (SWMP) must be referred to in order to provide a better understanding of the current and proposed stormwater management of the site. It is noted that the SWMP is dated after the freshwater ecosystems assessment. The proposal is for the existing stormwater channel to the north of the site to be extended across the site terminating in the stormwater pond and will replace the existing stormwater pipes.

Design specification for the stormwater channel should be provided, and it should be ensured that the channel is preferably not lined with concrete but is instead planted with appropriate wetland species that will stabilize the channel. Grass blocks or Armorflex could be contemplated but vegetation is preferred. Should this be implemented, this will significantly improve the current situation of piped stormwater, as it will provide for attenuation of flow in addition to filtration of sediment and pollutants. Another positive aspect would be further opportunities for groundwater recharge which would be of relevance to the existing well located in the vicinity of the proposed channel.

In conclusion CapeNature does not object to the development proposal, however the freshwater ecosystems assessment must be updated to more accurately reflect and compare the current and proposed stormwater management system of the site. It should additionally include measures which will minimize the impacts on the seepage wetland to the south of the site. The layout plan also needs to more clearly indicate the stormwater management features on the site.

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 horizontal line underneath.

Rhett Smart
For: Manager (Scientific Services)

cc. Rondine Isaacs, Department of Environmental Affairs and Development Planning