

## SCIENTIFIC SERVICES

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<b>reference</b>	SSD14/2/6/1/9/3/915_Cumberland_Industrial_Simondium
<b>date</b>	25 November 2018

Renier Kapp  
GNEC  
P O Box 2632  
Paarl  
7620

By email: [renier@gnec.co.za](mailto:renier@gnec.co.za)

Dear Renier,

**RE: CapeNature comment on Pre-App DBAR for proposed rezoning, subdivision and development of a mixed use development on Farm Cumberland no. 915, Simondium**

**DEA&DP Ref: 16/3/3/6/7/1/B3/28/1303/18**

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

1. The Western Cape Biodiversity Spatial Plan (WCBSP) of 2017 indicates a terrestrial Critical Biodiversity Area (CBA1) mapped in the western corner of the property. The WCBSP indicates that the reasons behind mapping the CBA in this area is to protect a threatened vegetation type and for water source protection. The location of the CBA is correctly reflected in the maps in the botanical assessment report. However the BAR should reflect a more comprehensive consideration of the WCBSP and the implications of the CBA and ESA (Ecological Support Area) (see point 4 below) on site. The ESA status should be indicated under point 6a of the BAR and the discussion should include reference to ESA and CBA status including the reasons for this classification (as indicated below).
2. In terms of botanical impacts, the mapped natural vegetation for the area is Swartland Alluvium Fynbos. As noted above this feature is **one** of the reasons for the CBA in this area. This vegetation type is classified as Critically Endangered according to criterion A1: Irreversible loss of natural habitat. This has been correctly referenced in the Botanical Specialist Report. In response to the discussion under point 6a (Biodiversity) of the BAR: more information on CBA and ESA status and management guidelines is available in both the Biodiversity Spatial Plan Handbook and the associated online maps available on SANBI's BGIS website. The WCBSP is a product of CapeNature and DEA&DP and is used as a key informant to all development applications.
3. In relation to freshwater impacts, the Berg River is located approximately 1.2 kilometres East of the proposed Industrial Complex development. A wetland is mapped around the dam to the north west of the property with a portion of the wetland being mapped as occurring along the

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

Board Members: Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Bond-Smith, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack

north western boundary of the property and coinciding with the CBA. As noted in point 2 above, one of the reasons for the CBA being mapped in this area is water source protection. The BAR should provide more information in relation to water source protection and the mitigation of potential impacts on water resources. For example the BAR indicates that treated effluent will be discharged into the watercourse located toward the north of the sewage treatment plant. The potential impacts of this need to be more comprehensively assessed, particularly in the context of the mapped ESA2 across the northern and eastern sections of the site. As indicated in the botanical report, this aspect (correctly) did not form part of the scope of the botanical report and thus, in the absence of the freshwater report, has remained unassessed.

4. The WCBSP indicates that in addition to the CBA there are Ecological Support Areas (ESA2) mapped across the northern and eastern parts of the property. The reasons for the ESA status are given in the WCBSP as being to protect a water source area and for water course protection. Additionally the reason for the ESA in this area is due to the mapped natural vegetation type (Swartland Alluvium Fynbos) being Critically Endangered. The desired management objective for ESA2 areas is that they are restored and / or managed to minimise impact on ecological infrastructure functioning, especially soil and water related services – of particular relevance given that the reason for the ESA in this area is for water course and water source protection (ground water recharge). The potential for the restoration of the threatened vegetation type (Swartland Alluvium Fynbos) within the mapped ESA and CBA areas of the property should be explored in the next phase (2<sup>nd</sup> Draft BAR) of the development application process.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Philippa Huntly For: Manager (Scientific Services)