

**SCIENTIFIC SERVICES**

**postal** Private Bag X5014 Stellenbosch 7599  
**physical** Assegaaibosch Nature Reserve Jonkershoek  
**website** [www.capenature.co.za](http://www.capenature.co.za)  
**enquiries** Rhett Smart  
**telephone** +27 21 866 8017 **fax** +27 21 866 1523  
**email** [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
**reference** SSD14/2/6/1/4/6/56&4erven\_housing\_Durbanville  
**date** 13 August 2018

Guillaume Nel Environmental Consultants  
P.O. Box 2632  
Paarl  
7620

Attention: Euonell Visagie  
By email: [eg@gnec.co.za](mailto:eg@gnec.co.za)

Dear Euonell

**Revised Draft Basic Assessment Report for the Proposed Durbanville Gardens Assisted Living Residential Development, Erven 56RE, 4144, 4145, 15763 & 10853, Durbanville, Cape Town**  
(DEA&DP ref: 16/3/3/6/7/1/A5/20/2174/17)

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.

CapeNature commented on the Draft Basic Assessment Report in which we indicated that in general we do not support development within wetlands and therefore alternatives need to be investigated which will not impact on the wetlands. We had additionally queried the wetland delineation, in particular the methodology.

A second freshwater specialist study was undertaken, which used standard field-based procedures for the identification and delineation of wetlands in accordance with the Department of Water and Sanitation (DWS) guidelines. The delineation of the wetlands was similar to the initial freshwater specialist study for Erf 56RE, however no wetlands were mapped encroaching into the other erven, as with the initial freshwater specialist study.

The wetland which extends on to Erf 56RE is however described as a seep wetland which has been extensively modified, in particular through the earthworks which were referred to in our previous comments. The wetland is thus highly patchy and the report indicates that it is very difficult to determine the original extent of the wetland. The seep wetland habitat is therefore in very poor degraded condition. The valley bottom wetland linked to the Uitkamp Wetland only marginally encroaches on to the site.

Related to the earthworks described above, no response has been provided regarding whether any unlawful activities took place and if there was an investigation into this activity.

The conclusions of the second freshwater specialist report is that the development proposal is acceptable provided that a wetland rehabilitation plan is implemented which should target the two on-site stormwater detention ponds and the valley bottom wetland on the erf to the east (Erf 4140). The extent and condition of the wetlands which will be affected is not significant and the hydrological function can be accommodated in the stormwater management plan.

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

The second freshwater specialist report does not invalidate the initial freshwater specialist report however it does clarify concerns raised and provide recommendations for a suitable way forward.

A stormwater strategy has been included as an appendix and incorporates standard best practice. However, the stormwater detention ponds will need to be included as part of the wetland rehabilitation plan in accordance with the recommendations of the second freshwater specialist study. The stormwater strategy does not currently include wetland rehabilitation. The landscaping plan will also have to be amended in accordance with the wetland rehabilitation plan.

No response has been provided regarding whether a wetland offset is being considered in terms of the water use license application (WULA), or if avoidance of the wetland is being recommended. As indicated previously, wetland offsets are also relevant for the NEMA application, as it also functions as mitigation for ecological impacts.

The wetland rehabilitation plan as outlined above could function as a wetland offset, and CapeNature agrees that this would be the most suitable option in this particular case, taking into consideration the high ecological importance of the Uitkamp Wetland and the impacts of surrounding land uses on this wetland. CapeNature does still however wish to query why the development footprint could not have been decreased in order to allow for greater avoidance as mentioned previously. No alternatives have been investigated in this regard.

In conclusion the development proposal can be considered acceptable, however only if the wetland rehabilitation plan is implemented as recommended in the second freshwater specialist report. The wetland rehabilitation plan should be compiled before this application is considered for environmental authorisation. It would still be preferred if a greater buffer and avoidance of wetlands could be achieved in the layout.

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. Ayesha Hamdulay, Department of Environmental Affairs and Development Planning