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date 10 February 2019

Guillaume Nel Environmental Consultants
P.O. Box 2632
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Attention: Euonell Visagie
By email: eg@gnec.co.za

Dear Euonell

Third 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.

A third preferred development layout has been developed in response to concerns and constraints identified in the previous two versions of the Basic Assessment Report (BAR). The revised freshwater specialist report has evaluated the latest preferred layout in terms of impacts on freshwater ecology.

Alternative 2 assessed in the second draft BAR was an improvement on the initial preferred layout from a freshwater ecological perspective. The primary difference between Alternative 2 and Alternative 3, the current preferred alternative, is that the bowling green which encroached slightly into the wetland has been replaced by a park/garden, which will not require earthworks and can still support a level of wetland function, although there will be habitat modification.

The revised freshwater ecological assessment recommends that no wetland offset is required. The loss of highly degraded wetland patches in the sections which were subject to surface disturbance will be compensated by the proposed wetland rehabilitation for the sections which will not be developed. As mentioned above, Alternative 3 provides for further wetland rehabilitation opportunities within the park/garden area, albeit not rehabilitation to fully natural wetland. The conclusion is that there would be a net gain in wetland habitat and functionality provided that the wetland rehabilitation and other recommendations are followed.

It is noted that waste disposal/earthworks which historically took place on site is being investigated and subject to a separate process. CapeNature will comment further in that process.

In conclusion, CapeNature does not object to the proposed development provided the wetland rehabilitation and other recommendations and mitigation measures are

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

implemented. We wish to recommend that should the application be approved, an auditing programme of the wetland rehabilitation must be in place. Our previous comments also remain relevant.

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