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reference SSD14/2/6/1/9/3/15712_Industrial_Mixed_Wellington
date 8 October 2018

Euonell Visagie
GNEC
45 Fabriek Street
Paarl
7645

By email: eg@gnec.co.za

Dear Euonell,

RE: CapeNature comment on First Draft Basic Assessment Report for proposed mixed use precinct development on erf 15712, Wellington

DEA&DP ref. number – 16/3/3/6/7/2/B3/38/1253/18

CapeNature would like to thank you for the opportunity to comment on the above application and wish to make the following comments:

1. Erf 15712, located in Wellington, comprises a series of abandoned evaporation ponds previously used by an adjacent leather tannery. In terms of freshwater impacts, it is noted that the Freshwater Assessment found that the water course mapped as crossing the site is a stormwater drainage line. It is noted that the intention is to incorporate this into the open space and storm water attenuation facilities of the proposed new development in such a way as to provide habitat for avifauna. This and the recommendations made in the Freshwater Assessment Report, are supported.
2. In terms of botanical impacts, the mapped natural vegetation for the area is Swartland Alluvium Fynbos and Swartland Shale Renosterveld. Both are classified as Critically Endangered with the criteria informing this status being A1: Irreversible loss of natural habitat (for both Swartland Alluvium Fynbos and Swartland Shale Renosterveld) and D1: Threatened Plant Species Associations (for Swartland Shale Renosterveld).

Despite the majority of the site being largely transformed, the botanical survey found a small patch of habitat (as indicated in Figure 6 of the botanical assessment report) supporting remnant bulb species including the species *Lampranthus sociorum* which is listed as Vulnerable. As noted in the botanical report, the season during which the survey was done, is a limiting factor. Given that the botanical survey was done in July,

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

before the peak flowering season, it is likely that the area supports a higher number of species than recorded. A follow up spring survey is recommended for this site.

It is recommended that the next phase of this environmental assessment process (the 2nd Draft BAR) consider design layout alternatives that allow for the avoidance and rehabilitation of areas containing remnant blub species, such as but not limited to, that indicated in Figure 6 of the botanical report.

Please note that our comments pertain only to the biodiversity related impacts and not to the overall desirability of the application. 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 cursive script, appearing to read 'Philippa Huntly', written in black ink.

Philippa Huntly For: Manager (Scientific Services)