

postal Private Bag X6546, George, 6530
physical 4th Floor, York Park Building, York Street, George
6530
website www.capenature.co.za
enquiries **Megan Simons**
telephone +27 87 087 3060 **fax** +27 44 802 5313
email msimons@capenature.co.za
reference LE14/2/6/1/6/6/ERF 720_Development_
PreAPP
date **05 October 2023**

Cape Environmental Assessment Practitioners,
P.O.Box 2070,
George,
6530

Attention: Ms Louise-Mari van Zyl
By email: louise@cape-eaprac.co.za

Dear Ms Louise-Mari van Zyl

**THE PRE-APPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED
DWARSWEGSTRAND HOLIDAY RESORT ON A PORTION OF ERF 720, MOSSEL BAY
LOCAL MUNICIPALITY, WESTERN CAPE.**

DEA&DP Reference: 16/3/3/6/7/1/D6/17/0045/23

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

According to the Western Cape Biodiversity Spatial Plan (Pool-Stanvliet *et.al.* 2017)¹ the property has a strip of Critical Biodiversity Areas (CBA 1: Terrestrial) to the north east and Ecological Support Areas (ESA 1: Terrestrial) across the entire site. The property does not have any freshwater features present.

The Vlok and de Villiers (2007) fine scale vegetation map describes the area as Hartenbos Strandveld and Hartenbos Primary Dune. The National Biodiversity Assessment (Skowno *et al.* 2018)² mapped the vegetation as **Endangered** Hartenbos Dune Thicket (NEM:BA, 2022)³

Following a review of the PreApp BAR and specialist reports, CapeNature wishes to make the following comments:

1. **The Hartenbos Dune Thicket is part of the Albany Thicket Bioregion and is endemic to South Africa. This is a poorly protected ecosystem with 79% of its natural extent remaining. The Hartenbos Dune Thicket has not been critically assessed to determine the risks and pressures for this vegetation unit and data on the ecosystems condition**

¹ Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. Stellenbosch: CapeNature.

² Skowno, A. L., Poole, C. J., Raimondo, D. C., Sink, K. J., Van Deventer, H., Van Niekerk, L., Harris, L. R., Smith-Adao, L. B., Tolley, K. A., Zengeya, T. A., Foden, W. B., Midgley, G. F. and Driver, A. 2019. National Biodiversity Assessment 2018: The status of South Africa's ecosystems and biodiversity. Synthesis Report. Pretoria, South Africa. 214 pp.

³ National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004). The Revised National List of Ecosystems that are Threatened and in need of protection. 2022. Government Gazette No. 47526

(including biotic disturbances, overutilization, and altered fire regimes) is limited (SANBI 2022)⁴.

2. The proposed development site is surrounded by urban development, and it is understood that the surrounding open/ natural areas will also be developed. However, the site is partially connected to the west and to the south of the property, which will not be developed. CapeNature therefore supports the 10m buffer along the ecotone boundary.
3. According to the WC BSP the property is within a coastal corridor (Pool-Stanvliet *et.al.* 2017). Coastal ecosystems are ecological infrastructures that provides a range of regulatory services to coastal communities⁵. The foredunes play an essential role in providing physical buffering against sea storm surges and other potential climate change related impacts. Therefore, they should be in a functional near-natural state. As these areas are important corridors to maintain landscape connectivity it is crucial that no further disturbances occur, and that the area must be restored to improve connectivity and reduce landscape fragmentation.
4. In terms of section 15(1) of the National Forests Act⁶, no person may cut, disturb, damage, or destroy any protected tree or possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree except under a license granted by the Minister.
 - 4.1. CapeNature acknowledges the indigenous protected trees will be incorporated and recommend the Department of Forestry, Fisheries and Environment (DFFE) provide comments. Furthermore, these protected trees must be demarcated as No-Go areas and illustrated on a map which must be included in the EMPr.
5. The applicant is reminded that the management of invasive alien species is a requirement of all landowners in terms of both the Conservation of Agricultural Resources Act (CARA) and the NEM:BA Alien and Invasive Species Regulations and applies to the entire property. The eradication methods of invasive aliens must be compliant with the National Environmental Management: Biodiversity Act (Act No.10 of 2004)⁷ and including areas outside of the proposed development area.
6. Suitable locations must be determined before the geophytes are relocated. The season should also be considered to give the plants an adequate chance to re-establish. CapeNature is of the opinion that a suitable site with similar microclimate and geological conditions must be identified, and the success rate must be confirmed. Furthermore, it will be important that an experienced Environmental Control Officer (with botanical knowledge) be appointed to oversee the removal of the plants.
7. Fencing around the property must be animal permeable. Thus, appropriately sized fence gaps, at the ground level, must allow the movement of small mammals. These fences must be visible to wildlife, including birds, by fitting reflective or colorful weather-resistant flags (e.g., aluminum, or plastic strips) to the wire.
8. CapeNature supports the recommendation to relocate the staircase and the proposed access road to maintain the remaining natural vegetation and landscape connectivity.

⁴ Government of South Africa (2022) South African Red List of Terrestrial Ecosystems: assessment details and ecosystem descriptions. Technical Report #7664, SANBI Pretoria, South Africa.

⁵ Cadman, M. (ed.). 2016. Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape, Edition 2. Fynbos Forum, Cape Town.

⁶ National Forest Act, 1998 (Act No. 84 of 1998). 1998. Government Gazette No. 19408.

⁷ Government Gazette No. 37885, GN No. R. 598 (2014) National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) Alien and Invasive Species Regulations, 2014.

9. The ECO must ensure that the mitigation measure proposed by the specialists are implemented to protect the remaining ecological process and landscape connectivity.

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 'Megan Simons', with a stylized flourish extending to the right.

Megan Simons
For: Manager (Landscape Conservation Intelligence)