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# FRESHWATER COMPLIANCE STATEMENT

Portion 5 of Farm 296, Keurboomstrand.

**Arch Rock Resort**



Prepared for Cape EA Prac

by

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I consider myself bound to the rules and ethics of the South African Council for Natural Scientific Professions (SACNASP);

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- All the particulars furnished by me in this document are true and correct.



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## TABLE OF CONTENTS

<b>1.</b>	<b>INTRODUCTION .....</b>	<b>2</b>
1.1	NATIONAL ENVIRONMENTAL MANAGEMENT ACT .....	2
1.2	SCOPE OF WORK .....	3
1.3	ASSUMPTIONS AND EXCLUSIONS.....	3
<b>2.</b>	<b>APPROACH .....</b>	<b>3</b>
<b>3.</b>	<b>DESKTOP SURVEY .....</b>	<b>4</b>
<b>4.</b>	<b>SITE VISIT .....</b>	<b>5</b>
<b>5.</b>	<b>AQUATIC BIODIVERSITY COMPLIANCE STATEMENT .....</b>	<b>6</b>
<b>6.</b>	<b>REFERENCES .....</b>	<b>7</b>

## LIST OF FIGURES

Figure 1: Site development plan on Portion 5/296 Keurboomstrand. ....	2
Figure 2: Location of the property in relation to mapped freshwater features. ....	5
Figure 3: Photographs indicating the vegetation on the site. ....	6

## 1. INTRODUCTION

Confluent Environmental was appointed by Cape EAPrac to undertake a site verification for the re-development of the Arch Rock resort, in Keurboomstrand, Plettenberg Bay, in the Western Cape (Figure 1). The site has been classified as having 'Low' aquatic biodiversity by the Department of Environment, Forestry and Fisheries (DFFE) screening tool.

The scope of work for this report is guided by the legislative requirements of the National Environmental Management Act (NEMA) and the National Water Act (NWA).



Figure 1: Site development plan on Portion 5/296 Keurboomstrand.

### 1.1 National Environmental Management Act

According to the protocols specified in GN 320 (Protocol for the specialist assessment and minimum report content requirements for environmental impacts on aquatic biodiversity) of the National Environmental Management Act (NEMA; Act No. 107 of 1998), assessment and

reporting requirements for aquatic biodiversity are associated with a level of environmental sensitivity identified by the national web-based environmental screening tool (screening tool). An applicant intending to undertake an activity identified in the scope of this protocol on a site identified by the screening tool as being of:

- **Very High** sensitivity for aquatic biodiversity, must submit an Aquatic Biodiversity Specialist Assessment; or
- **Low** sensitivity for aquatic biodiversity, must submit an Aquatic Biodiversity Compliance Statement.

The screening tool classified the site as being of **Low** aquatic biodiversity as it is not located in a Freshwater Ecosystem Priority Area (FEPA; Nel *et al.*, 2011), or a Strategic Water Source Area, and has no mapped watercourses (wetlands or drainage lines) in or near the property boundary.

According to the protocol, prior to commencing with a specialist assessment a site sensitivity verification must be undertaken to confirm the sensitivity of the site as indicated by the screening tool:

- Where the information gathered from the site sensitivity verification differs from the screening tool designation of **Very High** aquatic biodiversity sensitivity, and it is found to be of a **Low** sensitivity, an Aquatic Biodiversity Compliance Statement must be submitted.
- Similarly, where the information gathered from the site sensitivity verification differs from the screening tool designation of **Low** aquatic biodiversity sensitivity, and it is found to be of a **Very High** sensitivity, an Aquatic Biodiversity Specialist Assessment must be submitted.

## 1.2 Scope of Work

The objectives of this assessment included the following:

- To undertake a desktop analysis and site inspection to verify the sensitivity of aquatic biodiversity as **Very High** or **Low**; and
- Compile an Aquatic Biodiversity Compliance Statement or Aquatic Biodiversity Specialist Assessment based on the site verification of the sensitivity of the site.

## 1.3 Assumptions and exclusions

- Much of the present site has been transformed as a tourist resort and it is therefore not possible to determine whether any small watercourses were present on the site and subsequently transformed.

## 2. APPROACH

The following rationale was adopted to determine the sensitivity of aquatic biodiversity within the footprint of the site:

- In the event that unmapped watercourses are confirmed to fall within the development footprint then the site sensitivity is confirmed as **Very High** and a full specialist freshwater assessment is required; and

- In the event that no watercourses are identified within the development footprint the site sensitivity is confirmed as **Low** and an Aquatic Compliance statement is required.

The determination of the site sensitivity relied upon the following approaches:

- Interrogation of available desktop resources including:
  - DWS spatial layers;
  - National Freshwater Ecosystem Priority Areas (NFEPA) spatial layers (Nel et al., 2011);
  - National Wetland Map 5 and Confidence Map (CSIR, 2018)
  - Western Cape Biodiversity and Spatial Plan (WCBSP) for Mossel Bay (CapeNature, 2017).
- A site visit was undertaken on 18 November 2021, during which time the following activities were undertaken:
  - Identification and classification of watercourses within the footprint of the site and within 500m of the site according to methods detailed in Ollis *et al.* (2013);
  - Soil augering to confirm the presence of soil indicators (DWAF, 2005) that may indicate the presence of a wetland (if applicable); and
  - Identification of hydrophilic plant species that may indicate the presence of wetland plant species (if applicable).

### 3. DESKTOP SURVEY

The site falls within quaternary catchment K70A. No freshwater features are indicated to occur within the footprint of the property or within close proximity to the property (Figure 2).





Figure 2: Location of the property in relation to mapped freshwater features.

#### 4. SITE VISIT

The site was visited on 18 November 2021 which is considered early summer. The area has experienced good rainfall, and therefore any aquatic features at the site would be expected to be fully apparent. The entire site was inspected for evidence of a wetland, drainage line, or any other watercourse. The footprint of the site is already developed as a tourist resort, and the remaining natural areas were all terrestrial with elements of coastal dune and forest vegetation. Neighbouring properties on all sides were also inspected. No freshwater features were identified within the footprint of the property or within 500m of the property development.



Figure 3: Photographs indicating the vegetation on the site.

## 5. AQUATIC BIODIVERSITY COMPLIANCE STATEMENT

Based on the results of the desktop review and the site survey, the sensitivity of aquatic biodiversity on Portion 5/296 can be regarded as **Low**. The main factors influencing the statement include the following:

- The development is not located in an area designated as a SWSA or a FEPA ;
- No freshwater features were identified within the footprint area of the site or within close proximity (i.e. at least 500 m) of the site.



## 6. REFERENCES

Council for Scientific and Industrial Research (CSIR; 2018). National Wetland Map 5 and Confidence Map [Vector] 2018. Available from the Biodiversity GIS website, downloaded on 30 September 2020.

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