CONSERVATION INTELLIGENCE: LANDSCAPE EAST

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Reference LE14/2/6/1/6/6/220-209_Residential_Aalwyndal
Date **19 January 2024**

Cape Environmental Assessment Practitioners,
PO Box 270,
George,
6530

Attention: Ms Mariska Byleveld
By email: mariska@cape-eaprac.co.za

Dear Ms Mariska Byleveld

THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR THE OUTENIQUASIG ESTATE ON PORTION 209 OF FARM VYF-BRAKKE-FONTEIN NO.220, AALWYNDAL, MOSSEL BAY LOCAL MUNICIPALITY, WESTERN CAPE.

DEA&DP reference: 16/3/3/6/7/1/D6/28/0200/22

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 is not within Critical Biodiversity Areas and Ecological Support Areas but is entirely mapped as Other Natural Areas. The property does not have any freshwater features or National Freshwater Ecosystem Priority Area (NFEPA)[2]. According to Vlok and de Villiers (2007)[3] fine scale vegetation maps the area is described as Brandwag Fynbos-Renoster Thicket. The National Biodiversity Assessment (Skowno *et al.* 2018)[4] mapped the vegetation as North Langeberg Sandstone Fynbos which is Least Concerned (SANBI 2022)[5].

Other Natural Areas have the greatest flexibility in terms of permissible land uses. ONA are defined as: *"Areas not currently identified as a priority but retain most of their natural character and perform a range of biodiversity and ecological infrastructure functions. Although not prioritised, they are*

[1] Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. Stellenbosch: CapeNature.
[2] Nel, J.L., Murray, K.M., Maherry, A.M., Petersen, C.P., Roux, D.J., Driver, A., Hill, L., Van Deventer, H., Funke, N., Swartz, E.R., Smith-Adao, L.B., Mbona, N., Downsborough, L. & Nienaber, S. (2011). Technical Report for the National Freshwater Ecosystem Priority Areas project. WRC Report No. K5/1801
[3] Vlok JHJ, de Villiers R (2007) Vegetation Map for the Riversdale Domain. Unpublished 1:50 000 maps and report supported by CAPE FSP task team and CapeNature.
[4] 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.
[5] Government of South Africa (2022) South African Red List of Terrestrial Ecosystems: assessment details and ecosystem descriptions. Technical Report #7664, SANBI Pretoria, South Africa.

still an important part of the natural ecosystem." Although ONAs are not prioritised, they are still an important part of the natural ecosystem. Thus, the objectives of ONA are to:" *Minimize habitat and species loss and ensure ecosystem functionality through strategic landscape planning. Offers flexibility in permissible land-uses, but some authorisation may still be required for high-impact land-uses.*"

The North Langeberg Sandstone Fynbos has experienced low rates of natural habitat loss. The threats to this ecosystem have not been compiled yet, but it is a well-protected vegetation unit with 91% of the natural extend remaining (SANBI 2022).

CapeNature reminds the applicant that all endangered species or protected species listed in Schedules 3 and 4 respectively, in terms of the Western Cape Nature Conservation Laws Amendment Act, 2000 (Act No. 3 of 2000) may not be picked or removed without the relevant permit, which must be obtained from CapeNature.

In terms of section 15(1) of the National Forests Act[6], 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. Therefore, CapeNature recommend the department of Forestry, Fisheries, and Environment provide comments for this application.

Following a review of the Pre-application BAR and Specialist studies, CapeNature wishes to make the following comments:

1. The Aquatic biodiversity compliance statement found the aquatic sensitivity is low, and CapeNature is satisfied with the result.

2. The property has fynbos in good/ natural condition with very few invasive alien plants and is extremely dense with *Erica* spp to ±1 m in height (personal observation). The Proteoid Fynbos which is fairly dense in an indication that the property has not been burnt. CapeNature agrees with the on-site observations in the Plant and Terrestrial reports.

3. As mentioned by the specialist the site has a degree of rockiness which contains a relatively high species richness. The underlying lithology is a key ecological diver in maintaining the ecosystem function and patters of sandstone fynbos. Housing infrastructure is generally not compatible in conserving fynbos (Helme *et al.* 2006). Thus, reducing or limiting the development footprint to relieve pressure on natural habitat and ecological processes is encouraged.

4. The SCC that will be lost is *Hermannia lavandulifolia* (VU) *Polygala pubiflora* (VU). If possible, SCC should always be avoided. The specialist could not find eight SCC on site (status EN to VU) however these plant species were not ruled out as not being present on site.

5. The specialist has attempted to include ecological corridors however the proposed development will result in the loss of 4.2 ha of fynbos (including Species of Conservation Concern). The principle of "as large as possible" is required for developing and maintaining ecological and hydrological corridor linkages. Having wider corridors to preventing habitat and landscape degradation and ecosystem function will have implications on the proposed development design.

6. Considering the rapid increase in development applications within the Mossel Bay, specifically Aalwyndal, properties should not be seen in isolation but within the broader landscape to prevent further fragmentation, habitat loss, and transformation of across

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

the landscape. Thus, connecting this property to similar (i.e., surrounding, and adjacent) habitat is important.

7. According to the Biodiversity Assessment (2019)[7] which was compiled for the Aalwyndal Precinct Plan the Aalwyndal area has a few opportunities for landscape connectivity. Improving connectivity between fynbos and renosterveld habitat will help to improve the impact of local fragmentation. Furthermore, the Botanical Sensitivity Map show portion 209 of farm 220 as being in the High Sensitivity area (Fig.1). The report described the area as follow "*High sensitivity areas support largely intact natural habitat that has the potential to support at least one plant Species of Conservation Concern, and in most cases may support from one to two such species. Overall species diversity is high, with more than 75% of the potential complement of species present.*" The specialist found a high species richness, the fynbos was in a good condition, and two SCC (both vulnerable) are present at the property further highlighting the sensitivity of the site.

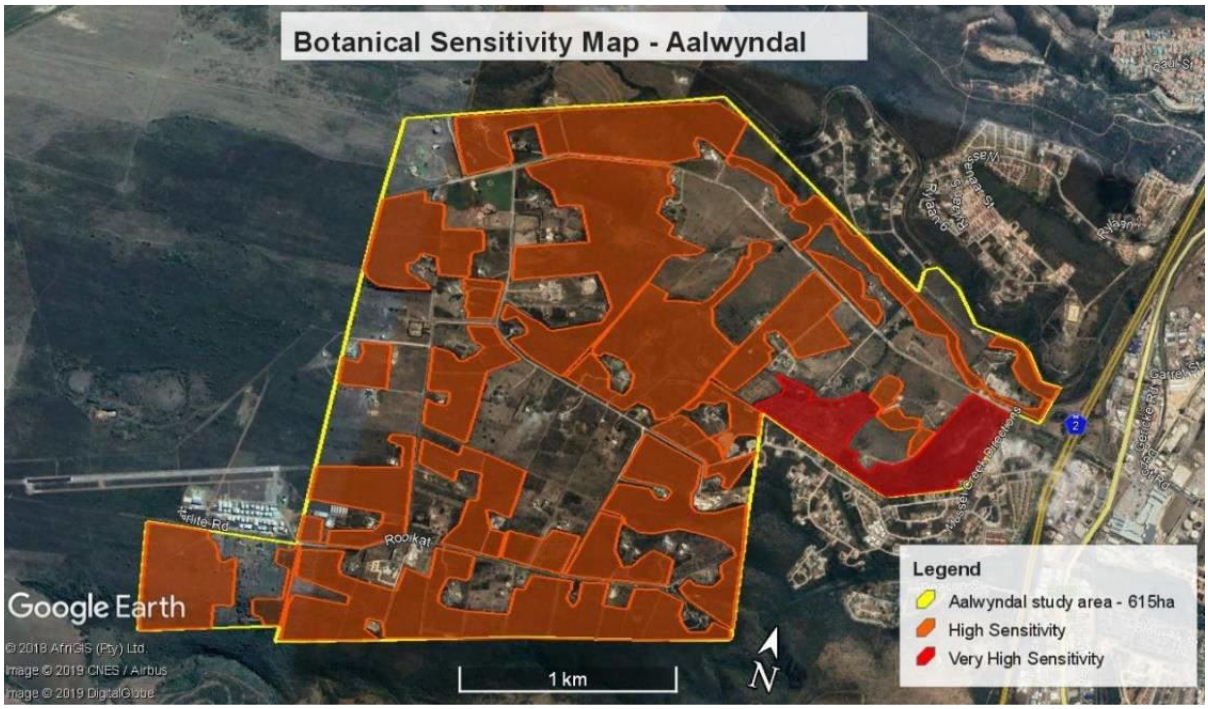

Figure 1: The Botanical Sensitivity Map for the Aalwyn Study Area (SES report, 2019).

8. Although the site is within a least threatened vegetation and does not have CBA or ESA. The ground-truthing found that the site has species of conservation importance, and that the vegetation is still in a natural condition with few disturbances and infestation by invasive plants.

9. In compiling the WCBSP every effort has been made to include all datasets. If any inaccuracy resulted from inconsistencies in scale or classification error, then this would have impacted the BSP Map. One known inaccuracy for Mossel Bay is the vegetation classification (SA vegetation Map 2012). However, the ground truthing and the SES report has confirmed that the site is more sensitive.

In conclusion, the proposed development will result in the loss of sensitive biodiversity. The Site Ecological importance score was High and continuous loss of sensitive habitat will further fragment landscape connectivity, which should be avoided as best possible. CapeNature does not support development which results in irreversible loss of biodiversity.

[7] Bekker D., and Burger M. 2019. Biodiversity assessment for the Aalwyndal Precinct Plan, Mossel Bay. Unpublsihed.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely,

Megan Simons
For: Manager (Conservation Intelligence)