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reference LE14/2/6/1/6/6/ERF 21277
_PREAPP/Development_Aalwyndal
date 08 June 2023

Kapp Environmental Consultants (Pty) Ltd,
P.O. Box 12844,
Garden Route Mall,
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Attention: Mr Renier Kapp
By email: renier@kappec.co.za

Dear Mr Renier Kapp

**THE PREAPPLICATION BASIC ASSESSMENT REPORT FOR THE PROPOSED LIGHT
INDUSTRIAL DEVELOPMENT (STORAGE FACILITY) ON PORTION A OF ERF 21277,
AALWYNDAL, MOSSEL BAY LOCAL MUNICIPALITY, WESTERN CAPE.**

DEA&DP reference: 16/3/3/6/7/1/D6/29/0075/21

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 erf has Other Natural Areas and is outside the extent of Critical Biodiversity Areas and Ecological Support Areas. Furthermore, the erf does not have any freshwater features / National Freshwater Ecosystem Priority Areas (NFEPA)².

The National Biodiversity Assessment (Skowno *et al.* 2018)³ mapped the vegetation as North Langeberg Sandstone Fynbos which is Least Concerned (SANBI 2022)⁴.

Following a review of the Pre-Application Draft Basic Assessment Report, Biodiversity Screening Report, and Aquatic Biodiversity Compliance Statement CapeNature wishes to make the following comments:

1. 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*

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 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.

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.

*natural character and perform a range of biodiversity and ecological infrastructure functions. Although not prioritised, they are 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.*”*

2. The Freshwater Specialist could not find any aquatic features present on erf 21277 however it is still important that the proposed mitigation measures be strictly implemented to avoid negatively impacting the surrounding aquatic habitats.
3. 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.
4. 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).
5. The botanist observed elements from the Mossel Bay Shale Renosterveld on the erf. The threat status for this vegetation according to the revised list of ecosystems that are threatened and in need of protection (NEM:BA 2022)⁵ is **Critically Endangered**. According to the National Biodiversity Assessment the Mossel Bay Shale Renosterveld is one of seven high risk critically endangered vegetation types in South Africa (Skowno *et al.* 2018) which is not protected and only 38% of the natural extent remains which places this vegetation unit at risk of collapsing (SANBI 2022).
6. The Species of Conservation Concern (SCC) are clustered in the southeast section of the erf (Map 4 of the botanical report) which will be rezoned to Portion A (proposed industrial zone) and the proposed mitigation measure is to translocate these species to another site.
 - 6.1. A similar development was proposed for a property in proximity with the same vegetation unit. It was concluded that Search and Rescue of SCC would not be a viable mitigation measure as the plants will not survive the transplanting process. Thus, has a site been identified to translocate the SCC from erf 21277? The Botanist must also assess what the success rates would be for translocation SCC.
 - 6.2. CapeNature is of the opinion that the cluster with SCC must be excluded and protected from the proposed development unless a suitable site with similar microclimate and geological conditions can be identified and when a high success rate has been confirmed. Furthermore, it will be important that an experienced Environmental Control Officer (with botanical knowledge) be appointed to oversee the removal of the plants.

⁵ 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

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Associate Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Loubser, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack

7. The botanist does acknowledge the site is disturbed but also mentioned the degraded fynbos does have potential to fully recover. Furthermore, the botanist also observed a high diversity of indigenous species which he mentioned can revert to the original vegetation if agricultural practices are ceased. Rehabilitation success will be minimal after development, as stated in the report. Thus, the proposed development will result in the complete transformation. Considering the rapid increase in development within the Mossel Bay, specifically Aalwyndal, it remains crucial to prevent further fragmentation, habitat loss, and transformation of across the landscape.
8. Due to the presence of SCC, Presence of elements of the **Critically Endangered** Mossel Bay Shale Renosterveld, and the site having a potential to recover to its original state, the site should be viewed as sensitive. If the proposed activity will continue the loss of SCC will have a local impact, but the impact regionally should be determined.

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 (Landscape Conservation Intelligence)