CapeNature

CONSERVATION INTELLIGENCE: LANDSCAPE CENTRAL

postal Private Bag X5014 Stellenbosch 7599
physical Assegaaibosch Nature Reserve Jonkershoek
website www.capenature.co.za
enquiries Leandra Knoetze
telephone +27 21 866 8022 **cell** +27 83 278 0949
email lknoetze@capenature.co.za
reference SSD14/2/6/1/7/4/RE/9/313_Housing_Grabouw
date **05 October 2025**

Kurt Wicht
Engineering Advice and Services (Pty) Ltd
P.O. Box 13867
Humewood
Gqeberha
6013

By email: kurtw@easpe.co.za / enviro@easpe.co.za

Dear Mr Wicht

RE: The Proposed Greater Grabouw Housing Project – Portion A of RE/9/313 in Grabouw, Theewaterskloof Local Municipality, Western Cape – Draft Basic Assessment Report
DEA&DP Ref: 16/3/3/6/7/1/E4/11/1167/25

CapeNature would like to thank you for the opportunity to comment on the Draft Basic Assessment Report. Please note that our comments pertain primarily to impacts on biodiversity and not to the overall desirability of the project.

1. According to the South African Vegetation Map (2018), the area supports Kogelberg Sandstone Fynbos, a Critically Endangered vegetation type. However, the area seems to be disturbed by historical forestry, grazing, informal use (urban-related activities like a sports field, livestock pens, housing encroachment and waste dumping) and only a few patches of natural (degraded) vegetation remain.

2. The proposed site is situated within a Terrestrial Critical Biodiversity Area (CBA1) to the west, and CBA2: Degraded (to the east) according to the 2023 Biodiversity Spatial Plan (BSP). CBAs include areas that are usually, but not always in a natural condition that are required to meet biodiversity targets for species, ecosystems or ecological processes and ecological infrastructure. The terrestrial CBA is mapped due to the presence of the threatened vegetation type and for Water Resource Protection. It is essential that these areas are maintained in a natural or near-natural state, with no further loss of habitat and degraded areas should ideally be rehabilitated and only low-impact, biodiversity sensitive land uses are appropriate.

   Furthermore, according to the 2017 BSP, the site is situated within an Ecological Support Area (ESA). The ESA mapping corresponds to the same area that's mapped as CBA2: Degraded in the 2023 BSP. ESAs play an important role in supporting the functioning of Critical Biodiversity Areas (CBAs) and are often vital for delivering ecosystem services. The ESA is mapped due to the Critically Endangered vegetation type, for Water Source Protection (Palmiet River) and Water recharge – it is essential that these areas are restored and/or managed to minimize impacts on ecological processes and ecological infrastructure functioning, especially soil and water-related services. Additionally, the site is located within a Strategic Water Source Area (SWSA) for Surface water (Boland) and Groundwater (Southwestern Cape Ranges) and falls within the 5km buffer of the Hottentots-Holland Mountain Catchment Area (MCA) and Steenbras Nature Reserve, Protected Areas.

The Western Cape Nature Conservation Board trading as **CapeNature**
Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

3. The Botanical Impact Assessment indicates that Environmental Screening Tool showed that the site has a Medium Plant Species Theme sensitivity and a Very High sensitivity for Terrestrial Biodiversity due to the presence of CBAs, ESAs, SWSAs and the Threatened Ecosystem (Kogelberg Sandstone Fynbos). The site is bordered by a township (Snake Park) to the northern and western sides, degraded fynbos on the eastern side and the N2 on the southern side – no Species of Conservation Concern (SCCs) were found onsite; however, a fair number of alien species were recorded on and around the proposed site. Even though the majority of the site was found to be disturbed, the Botanical Specialist still indicated that there are areas (to the east of the site) that has a Medium Botanical Site Ecological Importance (SEI) and seeing that the area falls within a CBA and consists of a Critically Endangered vegetation type, the degraded Fynbos patch of medium SEI/significance is incorporated into the open space zone. We agree with this mitigation measure, however, please can you clarify how these degraded patches will be protected or conserved during the construction and once the construction is completed. How will you ensure that new livestock pens, or waste dumping does not occur within this area?

4. According to the Aquatic Impact Assessment the site has a Very High Aquatic Biodiversity sensitivity. Although no wetlands were identified in the immediate vicinity of the development site, the Aquatic Specialist identified an Ephemeral Drainage Line (EDL) on the western side of the site, which flows towards the Palmiet River approximately 1.3 km downstream. Although the EDL was found to be in a Seriously Modified Present Ecological State (PES) with Low Ecological Importance Sensitivity (EIS), it was recognized as a potential conduit for water and pollutants to the highly sensitive Palmiet River. The Palmiet River is classified as Endangered, Poorly Protected and of Very High Ecological Importance and Sensitivity (SEI) and is designated as a Critical Biodiversity Area (CBA) and Phase 2 Freshwater Ecosystem Priority Area (FEPA). Given this ecological context, the need to prevent any further degradation to the EDL – that might impact the Palmiet River was emphasized (especially in terms of water quality and invasive species spread). We therefore agree with the recommended 15 m ecological protection buffer around the EDL to avoid all direct disturbance to the watercourse.

5. We agree with the mitigation measures and recommendations set out in the Aquatic Impact Assessment, Botanical Impact Assessment and Environmental Management Programme (EMPr) to minimize the impacts of the proposed development on the receiving environment and ensure that the environment is not unnecessarily damaged. These mitigation measures must be included as conditions of authorization. The mitigation measures of high importance are:

    a. The development/construction footprint must be demarcated prior to any vegetation clearing or construction activities to ensure that no unnecessary loss of remaining natural vegetation takes place. Cleared vegetative material (and existing waste from dumping and livestock pens) must not be dumped anywhere other than an approved waste disposal site. Furthermore, all areas outside of the development footprint - especially the areas containing natural vegetation (zoned for Open Space) and buffer areas should be considered No-Go areas. A designated area should be allocated for stockpiling of removed material – this area should not be within No-Go areas or within the 15m ecological buffer around the EDL.

    b. All reasonable measures should be taken to limit erosion and sedimentation due to the construction/clearing activities. Where erosion and/or sedimentation occurs, rectification should be carried out in accordance with details specified by the ECO and any erosion channels developed during the initial clearing or due to construction activities must be backfilled and compacted. Additionally, construction work, particularly work close to the EDL, must as far as possible be restricted to the dry, summer season. Disturbed areas within the 15 m ecological buffer must be rehabilitated once construction activities have ceased with appropriate indigenous vegetation.

    c. The vegetation adjacent to and within the Open Space and No-Go (buffer) areas must be monitored continuously, post construction to ensure that no exotic or invasive species establish or spread from the disturbed and cleared areas or from the surrounding areas into the Open Space. This must be undertaken by a suitably qualified ecologist (Botanist or Ecologist) – to ensure that the correct Alien Invasive Plant species are identified and

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

removed. And any Invasive Alien plants encountered must be removed and disposed of in an appropriate manner and an approved disposal site.

6. Stormwater quality management is of high importance to prevent further degradation of the nearby Palmiet River and should incorporate litter and sediment traps. We recommend that the mitigation measures of the Environmental Management Programme (EMPr) for Stormwater Management are strictly adhered to and that a Stormwater Management Plan is compiled – which includes energy dissipation and erosion protection at stormwater outlets, and rehabilitation of erosion, as well as disturbed areas with indigenous vegetation. Stormwater management must be addressed both in terms of flooding and pollution potential; no stormwater runoff from any premises containing waste (like cement), or water containing waste emanating from activities and premises may be discharged into a water resource – polluted stormwater must be contained. Furthermore, please clarify where the stormwater pond for detention and regulation of stormwater outflow (Page 26 – DBAR) will be located, because the Site Development Plan indicates that it will be located within the area zoned for Open Space, which means that the area (hectares) for Open Space will be less and more area would be lost to the development.

7. We recommend that a suitably qualified Environmental Control Officer (ECO) is appointed to ensure that all the mitigation measures of the EMPr, Botanical Impact Assessment and Aquatic Impact Assessment are implemented and adhered to, especially the mitigation measures pertaining to trenching and stockpiling activities. Additionally, ensuring that the no-go areas (ecological buffer around the EDL and remaining natural vegetation within the open space) are avoided and that the water quality impacts during construction and development of the site are kept to a minimum.

8. According to the Draft Basic Assessment Report (DBAR), the 6.4 ha site will be subdivided to create 254 subsidy housing units (Single Residential Zone 2), an open space erf (2.42 ha) for recreation and ecological protection, and an internal public road network (Transport Zone 2). Please can you clarify what the area is currently zoned as and ensure that the applicant has applied for the correct permission/rezoning of the area before any construction commence – subdivision of the property might require a separate Land Use Planning Application (LUPA). Furthermore, the Executive Summary and Page 74 speak of Continuous monitoring and adaptive management strategies to address unforeseen impacts, more specifically Page 74 states "It is assumed that continuous monitoring will be carried out as planned and that any deviations or unforeseen impacts will be promptly addressed". Please can you clarify what this continuous monitoring entails, as well as what methods and timelines would be followed for the monitoring.

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

Yours sincerely

Leandra Knoetze

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

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar