

SCIENTIFIC SERVICES

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reference **SSD14/2/6/1/9/1/107-25_Appelsdrift_Robertson**
date **22 March 2018**

Lindsay Speirs
Doug Jeffery Environmental Consultants (Pty) Ltd
PO Box 44
Klapmuts
7625

By email: lindsay@dougjeff.co.za

Dear Ms Speirs

RE: Amendment of Environmental Authorisation for the unlawful clearing of indigenous vegetation for agricultural purposes on portion 25 of farm Appelsdrift, Robertson
DEA&DP Ref: 14/2/3/B1/14/0006/17

CapeNature would like to thank you for the opportunity to comment on the above application and wish to make the following comments:

1. It is noted that current application has been through a number of iterations, including a Section 24G process.
2. As highlighted in the Botanical Specialist Report, with the revision of the CBA mapping in 2017, the site is no longer identified as a CBA (Critical Biodiversity Area) but is now designated as Other Natural Area. However the need for ecological connectivity via biodiversity corridors remains, as stressed in the Botanical Specialist Report. The recommendations as provided in the Botanical Specialist Report are supported, viz:
 - The need for a biodiversity corridor to be included in the development plan. The biodiversity corridor is to provide connectivity between the habitat island north of the site and the extensive natural areas towards the south of the site.
 - There is concern however, as to the shape of the corridor being fairly convoluted and thus increasing edge effects.
 - Preferably, the corridor design should be aligned more to the 2013 recommendation. Straighter alignment reduces length of edges and pinch points.
 - The corridor should not contain any obstruction to animal movement.
 - The minimum width of the corridor to be not be less than 180m, preferably more.

- The corridor should be excluded from any development or disturbances.
3. There are Species of Conservation Concern (SCC) on site including *Astroloba rubriflora* (Vulnerable) and *Brianhuntleya intrusa* and *Euphorbia nesemaniae* (both Near Threatened). The biodiversity corridor is to serve as refuge for SCC, thus it is essential that it is well maintained and kept clear of invasive alien plants and that any erosion impacts within and near the edges of the corridor are avoided. This should be included in the management plan.
- Transplanting of a representative number of SCC from the transformed areas into the refuge area should be undertaken to further reduce the impact on SCC. Transplanting should be conducted in consultation with an area specialist botanist.
4. The drainage line on site is identified as an ESA (Ecological Support Area). Previous CapeNature comment has highlighted the need for this drainage line to be restored to support optimal functionality. This need is reiterated and liaison with DoA LandCare is recommended. The desired management objective for ESAs is that of maintaining a functional near natural state, hence the need for the functionality of the drainage line to be restored and optimised. A buffer for the drainage line should be stipulated in the Environmental Management Plan Report (EMPr).

Please note that our comments only pertain to biodiversity related impacts and not to the overall desirability of the proposed application. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Philippa Huntly
For: Manager (Scientific Services)

BREDE-GOURITZ

Catchment Management Agency
Opvanggebied Bestuursagentskap
I-Arhente yoLawulo lomMandla nokungqongileyo
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Reference numbers:	4/10/1/H40J/Appelsdrift 106 prt 25	Date: 6 March 2017	

Doug Jefferey Environmental consultants
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Attention Lindsay Speirs
(per email: Lindsay@dougjeff.co.za)

COMMENT: APPLICATION FOR AMENDMENT OF THE ENVIRONMENTAL AUTHORISATION FOR THE UNLAWFUL CLEARING OF INDIGENOUS VEGETATION FOR AGRICULTURAL PURPOSES ON PORTION 25 OF THE FARM APPELSDRIFT, IN THE ROBERTSON AREA.

DEA:DP ref no: 14/2/3/B1/14/0006/17

The Breede-Gouritz Catchment Management Agency (BGCMA) received the public participation process for comment for the abovementioned application, dated February 2018, and comment as follows:

The BGCMA has assessed the application and cannot support the application. The water use for transfer, as provided by the Central Breede River Water Users Association, is for temporary transfer of water to this property. The application for transfer of water use rights between properties is a water use licence application and can only be authorised by the Department of Water and Sanitation.

Should the applicant provide proof that they have submitted a water use licence application for the taking of additional water and the surrender of the water by the original water owner / property, the BGCMA will reconsider their comment. Please note that the application may place additional requirements and conditions on the application under the National Water Act.

General conditions:

The following general comments will be applicable for such an application:

- All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered to.
- No pollution of surface water or ground water resources may occur.
- The owner needs to adopt and implement a water demand management plan to conserve water.

The use of any additional volume of water, other than the Existing Lawful Use volume, is deemed unlawful until such time as an authorisation for the activity is provided in writing from the Department of Water and Sanitation.

The comments provided are in the interest of responsible water resource management. The BGCMA will gladly comment on any additional information provided for review. The BGCMA reserves the right to revise initial comments and request further information based on any additional information that might be received.

Should you need any further information regarding our comment, kindly contact this office.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jan van Staden', written in a cursive style.

MR. JAN VAN STADEN
CHIEF EXECUTIVE OFFICER (ACTING)