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**reference** LE14/2/6/1/6/1/DR 1797\_Road\_kurland  
**date** 27 November 2020

Hatch Africa (Pty) Ltd,  
Private Bag x20,  
Gallo Manor,  
Johannesburg,  
2052

Attention: Ms Michelle Miles  
By email: [michelle.miles@hatch.com](mailto:michelle.miles@hatch.com)

Dear Ms Michelle Miles

**DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED UPGRADING OF  
THE DR 1797 ROAD (REDFORD ROAD), KURLAND, BITOU LOCAL  
MUNICIPALITY, WESTERN CAPE.**

**DEA&DP reference:** 16/3/3/1/D1/9/0011/20

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CapeNature would like to thank you for the opportunity to review your application for DT 1797 road. The applicant proposed the following as extracted from the dBAR:

*“The DR 1797 is currently a gravel road. The main purpose of this project is to upgrade the road from a gravel road (Class 4) to a surfaced road (Special Class 4). The project is located on the DR 1797, which is a minor road off the N2 Highway in the Bitou Local Municipality of the Western Cape. This road is a dual lane, single carriageway and is situated in the jurisdiction of the Garden Route District Municipality (formerly known as the Eden District Municipality). The upgrade of DR 1797 Road will be from km 0.00 (left off the N2 and just past The Crags Petrol Station) to km 4.87, this includes the limit for construction as well.”*

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 (WCBSP 2017)<sup>1</sup> a minor section along DR 1797 road has Critical Biodiversity Areas (CBA 1: Terrestrial) and Ecological Support Areas (ESA 1: Terrestrial and Aquatic and ESA 2: Restore) are mapped across the road. The site is surrounded by the Garden Route National Park (to the east) and Whiskey Creek Nature Reserve (to the west). The Duiwelsgat and Rondebos Rivers flows along the northern boundry of the road and non-perennial rivers are present. National Freshwater

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<sup>1</sup> Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. Stellenbosch: CapeNature.

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

Ecosystem Priority Areas (FEPAs)<sup>2</sup> wetlands and dams are mapped across the site and the road is situated within a Strategic Water Source Area (Tsitsikamma). Additionally, the area is mapped as part of the Keurbooms Water Source Protection and South Eastern Coastal Belt Watercourse Protected. The vegetation units present along the DR 1797 road is Least Concerned Tsitsikamma Sandstone Fynbos<sup>3</sup>.

Indigenous Forest type are present and we recommend that the Department of Environment, Forestry and Fisheries (DEFF) be consulted regarding the extent of the forest. CapeNature reminds the applicant to apply for a permit from DEFF before removing protected trees and with working in the extent of the Forest.

The property has *Pittosporum viridiflorum* (Cheesewood) and *Podocarpus falcatus* (*Afrocarpus falcatus*) (Outeniqua Yellowwood) which are listed indigenous protected tree species<sup>4</sup>. Therefore, during construction there should not be any disturbance or damage to the protected trees. Prior to construction carefully mark the trees that will be retained and have measures to protect these trees. Throughout the road upgrading, the impact on the indigenous vegetation has to be minimal. Protected trees that will be retained and/ or transplanted has to be clearly marked. In addition, the re-planting of these trees must be in areas that will not be disturbed in future, due to development.

In terms of the Alien and Invasive Species regulations, specific alien plant species are either prohibited or listed as requiring a permit; aside from restricted activities concerning, *inter alia*, their spread, and should be removed<sup>5</sup>; without the use of heavy machinery, especially in close proximity to the watercourse.

The removal of alien and invasive plant species must be continuous and around properties adjacent to the road. Furthermore, we object to the introduction of alien invasive plant species for re-vegetation. Suitable indigenous vegetation must be used during the rehabilitation. We recommend a rehabilitation plan be compiled with inputs from a Botanist to inform the plan. The rehabilitation plan should include the following:

1. A list of suitable indigenous vegetation to be used for the rehabilitation;
2. define the timeframe for the re-vegetation; specify a timeframe and strategy for re-vegetation (i.e. season or time of the year when plants must be planted);
3. list when and how seeds or cuttings should be harvested from identified indigenous plants to be used for rehabilitation purposes; and
4. delineate the locations of suitable indigenous plant populations which could be sustainably used.

To prevent the dispersal of alien seeds, we advise that construction vehicles and machinery be washed regularly and away from any watercourse.

Prior to construction a search-and-rescue should be conducted for plant and animal species. A CapeNature permit would be required for plant and animal search-and-rescue. If any animal species are found, they should be relocated to suitable habitats. The plant and animal species can be used during rehabilitation.

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<sup>2</sup> 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.

<sup>3</sup> 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.

<sup>4</sup> National Forests Act, 1998 (Act No 84 of 1998) Notice of the List of Protected Tree Species under the National Forest Act, 1998 (Act No. 84 of 1998). Government Gazette no. 650

<sup>5</sup> National Environmental Management: Biodiversity Act 2004. (Act No.10 of 2004). Draft Alien and Invasive Species Regulations 2018. Government Gazette no. 112

The construction and expropriation should remain within the existing road and not disrupt areas that are currently undisturbed and the indigenous forest.

Identify and label separate waste receptacles for different waste. Ensure that the containers do not overflow by emptying them regularly.

Waste generated by the development (stored on site until it is removed to a landfill) must be away from the watercourse to avoid any waste along the road or in the aquatic habitats.

The extraction of material from borrow pits and quarries must be obtained from a registered source and the necessary authorization must be acquired.

The construction site should not be located within the extent of the indigenous vegetation or in close proximity to the watercourses.

The Environmental Control Officer (ECO) should be present, if possible, during the clearing of alien invasive plant species and vegetation to ensure the implementation of the proposed mitigation measures and to identify any harmful activities.

In conclusion, CapeNature objects to the introduction of alien invasive plants for the rehabilitation. Only indigenous vegetation should be used during re-vegetation. Invasive alien plant species should be removed using acceptable methods. Protected trees should not be harmed during the construction and clearly marked if they would be retained or re-located.

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)**

**Copies to:**

Azni November (WCPG: Department of Transport and Public Works);  
Anjé Taljaard (Bitou Local Municipality);  
Colin Fordham (CapeNature).