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Dear H. van Der Stoep

**Re: Draft Overstrand Integrated Development Framework: Long-term Spatial Development Planning – Towards 2050, dated September 2013; and Overstrand IDF Towards 2050: Draft Strategic Environmental Management Plan, dated 24 June 2013.**

CapeNature would like to thank you for the opportunity to comment on the above mentioned reports. We are however concerned that we did not have any early opportunities to comment on previous versions of these reports and feel that our earlier involvement in the process could have been beneficial to the process.

Our comments on the Draft Overstrand Integrated Development Framework: Long-term Spatial Development Planning – Towards 2050, dated September 2013 are as follows:

1. It is understood that the purpose of the Integrated Development Framework (IDF) is to be an internal document that incorporates all the multiple planning documents into one (e.g. IDP, SDF, EMF) in order to assist with planning for the next 30-40 years. It is important that there is no conflicting information in any of these documents.
2. In general we would support densification and infill development within most of the settlements as opposed to expansion of the urban edge, as most of the settlements in the Overstrand are surrounded by ecologically sensitive environments. The only exception would be the wetlands areas within towns e.g. Bettys Bay and Pringle Bay. Although we prefer densification and infill over expansion of the urban edge it is still important to maintain an open space network within urban areas, with corridors connecting ecologically important areas. According to these draft spatial plans, the open space networks within these settlements are generally limited.

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3. The CBAs should be used as one of the primary informants when delineating urban edges. We are concerned to see that many of the proposed settlement urban edges include CBAs (e.g. Kleinmond, Hawston, Fisherhaven and Greater Hermanus (West)) and request for these lines to be amended to exclude the CBAs. This becomes particularly relevant when trying to marry this draft IDF to the accompanying draft SEMF which strongly implies that no development will be accommodated within CBAs or sensitive ecosystems.
4. The colours used in these map do not always match the legends and at times, it is difficult to identify which areas are CBAs and which are not. Some maps have a bright green colour which is not interpreted at all by the legends (e.g. Hawston and Kleinmond). Some legends highlight CBAs as grey when they are in fact dark green on the maps.
5. The location of NFEPA's should inform the urban edge delineation and we therefore request for them to be displayed on the all maps proposing urban edges.
6. With regards to the spatial plans for each of the settlements within the municipality, CapeNature has the following comments:

Bettys Bay and Pringle Bay: These holiday settlements are as a result of historical subdivisions into residential erven. Unfortunately, a large proportion of these erven are located within wetlands. These are wetlands as defined both by the National Freshwater Ecosystem Priority Areas (NFEPA) and the Overberg CBA Map. The wetlands occurring along the coastline between Pringle Bay and Kleinmond are highly sensitive and of very high ecological importance. They are acidic wetlands that are highly sensitive to changes in water quality. CapeNature's specialist scientists have done extensive work in these wetlands and have confirmed the importance of these wetlands (Jeanne Gouws (freshwater), Andrew Turner and Atherton de Villiers (herpetofauna)). Grootvlei which is located within Bettys Bay, contains one of the most important populations of Micro Frog (*Microbatrachella capensis*), a Critically Endangered species. According to monitoring data, there has been a marked decline in its population numbers, which can be attributed to the increasing urban development of Bettys Bay.

The current erven is afforded development rights, although environmental authorisation is still required when located within a wetland. The EIA process is however not the correct tool to deal with this, as although the individual dwelling might have an acceptable impact on the receiving natural environment, it is the cumulative impact of all the dwellings which has a highly significant and unacceptable impact on the ecosystems. A higher level planning tool, such as this one, should provide some guidance on how to minimise these impacts and reverse the current trend.

Furthermore, wastewater provision through septic and conservancy tanks which results in high-nutrient load seepage and increased storm-water run-off thereby resulting in increased sediment loads, particularly from urban construction sites, are exasperating the impact on the aquatic ecosystems. We strongly recommend that measures are introduced to protect these wetlands and that these towns should not be the focus of further development, particularly in the wetland areas.

The industrial area adjacent to the R44 and lying east of Pringle Bay is not supported as it is located within wetland and is far removed from the urban settlement areas.

See Steve's comments re stewardship within Bettys Bay

Rooi-els: The Rooi-els Nature Reserve and koppie should be excluded from the urban edge

Kleinmond: The Lamloch Wetland Area between Kleinmond and Arabella contains very sensitive and ecologically important wetlands which should possibly be designated as an Estuary/Wetland corridor and earmarked for a specific project.

Furthermore, Arabella and Benguela Cove should not be accepted as precedents for any more similar large scale developments in the vicinity of the important and sensitive Bot River Estuary.

Hawston/Fisherhaven: The urban edge expands far beyond the current developed areas and incorporates many areas designated as CBA which it should not, specifically the Afdaks Area between R43 and Fisherhaven and the dune and wetland system south west of Fisherhaven. The urban edge needs to be refined and reduced. There should ideally be no further development along the shores of the Bot River Estuary.

Hermanus: Maintain open space linkages between the coast and the mountains between Fisherhaven and Hermanus East. Large scale infill developments should incorporate substantial open space corridors.

Stanford: Limit further development along the shores of the Klein River Estuary.

Gansbaai: Reference should be made to the Danger Point Precinct Plan currently underway to address open space corridors between the peninsula and inland. Eastern sections should exclude the CBAs.

Baardskeerdersbos: There appears to be agri-settlement and CBA conflict areas in the North. Unless the land is currently used for intensive agricultural purposes, we would like to see the land earmarked for conservation only and for the agri-settlement edge to exclude these CBAs. Alternatively, please provide guidance on how this document is to be applied as a guideline in land-use decision-making within these conflicting areas.

Our comments on the Overstrand IDF Towards 2050: Draft Strategic Environmental Management Plan, dated 24 June 2013 are as follows:

1. We would like to applaud the Withers Environmental Consultants for a well-researched and compiled document. This document appears to form a comprehensive reference for all relevant spatial biodiversity information of the study area. The consultants have displayed an in-depth knowledge and understanding of the various products and informants, how they were produced and how they are intended to be applied.
2. We question the difference between an Environmental Management Framework and a Strategic Environmental Management Framework such as this document. If this document is to be adopted by the Minister/MEC as an EMF and ultimately act as a trigger for a basic assessment in terms of Listing Notice 3 of the EIA Regulations then it is functioning as an EMF and should be called an EMF.
3. The current CBA Map for the Overberg District is being revised and will hopefully be replaced with a new provincial-wide systematic biodiversity plan (CBA Map) in 2016. It is envisaged that changes to the current layout of CBAs will be inevitable. This is largely due to a loss of natural land since the original assessment, an improvement on the informants, and an improvement on the science and methodologies adopted. The largest departure is expected to be within the Kogelberg Sandstone Fynbos and Overberg Sandstone Fynbos.

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These two vegetation types were deemed Critically Endangered due to criterion D1 (as detailed on Page 32 and 33) and as a result were automatically assigned CBA status. It is however likely, that due to their high protection status and/or remaining percentages, the new CBA Map would be able to free up some of these vegetation types as 'Other Natural Areas' thereby supporting some development within those patches which do not contain Red Data Listed species. With this in mind, and considering the long-term vision of this document, we recommend including a paragraph which stipulates that revised CBA Networks must replacing the current network.

4. Page 36 refers to Process Areas from the Overstrand 2006 SDF. Although we have not had time to familiarise ourselves with this layer, we are certain that with the production of a CBA Map for the area, such a layer would have been made redundant. This is because the CBA Map would have achieved these same objectives while being based on more recent information.
5. There are two additional informants which might be worth considering in this SEMF. They are the Heritage and Scenic Resources Assessment which was recently finalised as a component of the draft PSDF and SANBI's Coastal Conservation Plan as a component of the NBA.
6. Page 49 highlights a vision whereby extensive livestock do not graze within CBAs. We are of the opinion that if managed according to strict controls, CBAs can accommodate grazing. We also suspect that in time, the pressures on the land will only increase and it will become necessary for conservation and agriculture to cohabit at times.
7. Spatial Development Strategy #5 on page 55 highlights that formal protection is to happen through the CapeNature Conservation Stewardship Programme. Considering the long-term applicability of this SEMF it would be wise to list this programme as one of the options to achieving the goal of an expanded Protected Area network as opposed to the chosen method.
8. Section 5.4.2 proposes suitable land-uses and activities per pre-defined ecosystem status or type. We urge you to rather adopt the land-use guidelines of the CBA Map (Holness and Bradshaw, 2010) which proposes suitable land-uses per CBA Map category instead, i.e. what you are recommended to do, depends on how important the land is rather than what the land is. This is especially important as there has been a major shift to place value on the CBA status instead of the ecosystem status as previous practises simply resulted in high fragmentation and ultimately higher ecosystem status of the lesser threatened ecosystems over time. Certain developments should not take place within CBAs regardless of their ecosystem status while others can take place within Other Natural Areas whether they are Least Threatened or Endangered. These guidelines are also directly aligned to the PSDF Rural Land-use Planning and Management Guidelines. As the intention of these projects is all the same, we are confident that the recommendations in term of use of the land would be the same. The CBA Map guidelines are attached as an addendum to this letter.
9. Section 5.4.3 would however still hold as they provide guidelines per ecosystem type, i.e. advice to a landowner on how he/she should be managing his natural resources, based on what they are and not how important they are.
10. We furthermore propose an amendment to your Desired Management Objectives of Section 5.4.2.5. on Page 85 to be aligned to those proposed by the CBA Map, i.e.

CBA MAP CATEGORY→	Formal Protected Areas (Core 1)	Critical Biodiversity Areas (Core 1)	Ecological Support Areas (Core 2)	Other Natural Areas (Buffer 1 or 2)
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DESIRED MANAGEMENT OBJECTIVE→	Maintain natural land. Rehabilitate degraded to natural or near natural and manage for no further degradation.	Maintain ecological processes	Sustainable Management within general rural land-use principles
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11. Please update CapeNature's Land-Advice Units' contact details on page 77 to [landuse@capenature.co.za](mailto:landuse@capenature.co.za)

## Conclusion

We thank you for taking the time to consider our comments and suggestions. We will gladly engage further on these matters and are willing to meet for one-on-one meetings if any further expansion on these comments is required. We look forward to the ultimate completion and implementation of this Strategic Environmental Management Framework.

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

Yours sincerely

Kerry Maree and Rhett Smart



**For: Senior Manager (Scientific Services)**

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