

SCIENTIFIC SERVICES

postal 16 17th Avenue, Voëlklip, Hermanus, 7200
physical 16 17th Avenue, Voëlklip, Hermanus, 7200
website www.capenature.co.za
enquiries Rhett Smart
telephone +27 21 866 8017 **fax** +27 21 866 1523
email rsmart@capenature.co.za
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EnviroAfrica
P.O. Box 5367
Helderberg
7135

Attention: Clinton Geysler
By email: admin@enviroafrica.co.za

Dear Clinton

Pre-Application Basic Assessment Report for the Proposed Vineyards on the Remainder of Farm 56 Schoongezicht, Rustenberg Wine Estate, Stellenbosch (DEA&DP ref. no. 16/3/3/6/7/1/B4/45/1340/18)

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

CapeNature commented on the background information document in which we reported on the desktop information available for the site and recommended that a botanical scan should be undertaken and verification of the mapped watercourse.

A botanical assessment was undertaken which reported that the vegetation present within the study area (the area identified for investigation for cultivation) consists of intact natural vegetation, with the perimeters of the study area containing infestations of alien invasive species. As described, the study area was cleared for planting of vineyards, however the planting never took place. The species listed as dominant and present are typical of secondary vegetation that has recovered from disturbance e.g. *Athanasia trifurcata*, *Stoebe plumosa*.

In terms of the sensitivity mapping for the study area, the area of mainly indigenous vegetation is high sensitivity and mainly alien vegetation is medium-high sensitivity. As noted the site is classified as Ecological Support Area 2 with the description of the desired management objective. The vegetation type present is Boland Granite Fynbos listed as Vulnerable. It should be noted that in terms of this definition, cultivation would not be prohibited provided it allows for maintenance of ecological corridors and does not contribute to soil erosion (e.g. steep slopes) or impact on water resources to maintain ecological infrastructure functioning. We therefore wish to query the sensitivity scoring. We further wish to note that the 10 year threshold for reversion to natural vegetation is in terms of national agricultural and environmental legislation, however most vegetation types within the Western Cape do not

restore to their full or majority representative community within this time period (although active restoration can assist significantly).

The recommendation of the botanical assessment is that the cultivation of the area identified as optimal for cultivation in the soil study, which occupies less than half of the total study area, can be considered as acceptable provided that the “remainder of the site” is set aside for conservation in perpetuity. The designation of “the remainder of the site” needs to be defined, as to whether this refers to the study area or a larger area.

It should be noted that the Rustenberg Wine Estate does occupy a large area with a significant proportion of natural vegetation which would be considered favourably for conservation. The remainder of the study area alone would however only be small in extent and not contribute significantly to achieving conservation goals in isolation. It should further be noted that Rustenberg Wine Estate is part of the functional and active Greater Simonsberg Conservancy and that the natural areas across the full landholdings have been presented to the Western Cape Protected Area Expansion and Stewardship Review committee with WWF-SA as the lead agent. The recommendation was for an agreement with WWF and follow-up review at a later stage. Lastly, the upper slopes of the property are declared Mountain Catchment Area in terms of the Mountain Catchment Areas Act (Act 63 of 1970), which is a category of protected area which will be further defined and refined in legislation currently under review.

CapeNature is in agreement with the recommendation of the botanical assessment, as the loss of the small area of restoring fynbos can be compensated through the management and protection of the remaining natural vegetation, including alien clearing. This would not be considered as a biodiversity offset in terms of the relevant national policy and provincial guidelines, however this would be an on-site set aside secured through reactive stewardship and accordingly subject to CapeNature’s approach for reactive stewardship. Therefore, the botanical assessment should clarify the recommendations regarding the area to be secured and we recommend that the applicant consults with CapeNature regarding taking stewardship forward.

A freshwater opinion was undertaken and the findings were that there is no watercourse present in the location where a watercourse has been mapped. There was no channel or wetland or riparian vegetation present. The slope as evident in the photographs and contours does seem to indicate that this may be a conduit for run-off during rainfall events, particularly if the cover of Kikuyu grass were removed. CapeNature does not oppose the findings of the freshwater opinion, however we do request a response to our query and whether any mitigation would be required.

In conclusion, CapeNature recommends that the above concerns must be addressed by the specialists prior to submission of the Post-Application Basic Assessment Report and will require further consultation with CapeNature.

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

Yours sincerely



Rhett Smart
For: Manager (Scientific Services)
cc. Arnelle Collison, CapeNature