

**CONSERVATION INTELLIGENCE: LANDSCAPE
CENTRAL**

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reference SSD14/2/6/1/9/2/954etc_GenA_Chicken_Kleinfontein_Worcester
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Jenna Theron
PHS Consulting
P O Box 1752
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7200

By email: jt@phsconsulting.co.za / paul@phsconsulting.co.za

Dear Ms Theron

RE: The Proposed Development of a Free-Range Poultry Broiler Facility on the Remainder of Farm Number 563, 564, 565 and the Farm Kleinfontein Number 954, Worcester – Pre-Application Draft Basic Assessment Report
DEA&DP Ref: 16/3/3/6/7/1/B2/32/1251/25

CapeNature would like to thank you for the opportunity to comment on the Pre-Application 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 proposed development area supports Breede Shale Renosterveld (majority of the area), an Endangered Vegetation Type. There are also smaller patches of Robertson Karoo (to the East) and North Sonderend Sandstone Fynbos (to the South), both listed as Least Concern Vegetation Types. However, the area appears to be transformed through previous agricultural activities and very little natural vegetation remains, mainly along certain freshwater crossings.
2. The proposed development areas are partially situated within a Terrestrial Critical Biodiversity Area (CBA 1 & CBA2: Degraded), 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 Watercourse protection (Western Folded Mountains). 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 proposed development areas are partially situated within an Ecological Support Area (ESA & ESA2: Restore). ESAs play an important role in supporting the functioning of CBAs and are often vital for delivering ecosystem services. The ESA is mapped due to the presence of the threatened vegetation type, watercourse, Water source and Water Recharge area and it is essential that this area is maintained in a functional, near-natural state and underlying biodiversity objectives are not compromised. Additionally, the site is located within a Strategic Water Source Area (SWSA) for Groundwater (Southwestern Cape Ranges) and is in close proximity to the Riviersonderend Mountain Catchment Area (MCA) – which is a Protected Area.

3. According to the Freshwater Assessment, the site falls within the larger Hoeks River Catchment, specifically within Quaternary Catchment H40F, which forms part of the Breede-Gouritz Water Management Area (WMA). The landscape is generally characterized by undulating hills and valleys, predominantly used for agricultural purposes, and includes several small tributaries of the Ratel Rivier. The site contains four primarily seasonal streams (Streams A – D), which originate in the southeastern hills and flow north-north-west, eventually converging into two tributaries before joining the Ratel River. While their upper reaches remain natural, the streams become modified to varying degrees in farmed areas due to vegetation clearance, agricultural encroachment, instream dams, and canalisation. Stream A and B is located on the western side of the property (See Figure 8) and has a Largely to Seriously Modified Present Ecological State (PES) and a Low to Moderate Ecological Importance and Sensitivity (EIS). Stream C and D is located on the eastern and southern side of the property and has a Natural to Largely Natural Present Ecological State (PES) and a High Ecological Importance and Sensitivity (EIS). Therefore, any water quality impacts and further hydrology modifications on these freshwater ecosystems (especially the more natural ones) should be minimised, mitigated or avoided and the aim should be to improve the PES of these streams.
4. Water quality impacts due to the operation of the Broiler Facility, the building of the roads, installation of cables and pipelines and the Bunded Diesel Tank is our biggest concern from a Biodiversity perspective. The management of wastewater (including wash water) needs to be carefully considered to prevent any contamination of groundwater – seeing that the area is located within a SWSA for Groundwater. We recommend regular testing of the water quality and water that will be discharged from the Broiler facility – to ensure that the surrounding water resources are not affected by the construction or operation of the Facility. Furthermore, a Stormwater Management Plan should also be put in place – to address both erosion and pollution potential. Regarding the Diesel Tank, an emergency plan needs to be put in place, in case of a leak to ensure that the groundwater and water quality of the freshwater ecosystems are not impacted.
5. The Pre-Application Draft Basic Assessment Report (DBAR) indicates that the development footprint of the proposed development and associated infrastructure will be approximately 46 300 m². This includes the 20 Broiler Houses, Access Roads, Ablutions, Additional Dwelling, Water Treatment Plant, two Reservoirs, Diesel Tank, Generator Room, Gate House, Spray Race, Water Pipelines and Electrical cables. Please can you indicate the footprint or size of each of the abovementioned developments or infrastructure separately, as well as indicate the exact length of the new roads, water pipelines and electric cables, additionally specifying what material would be used for the electric cables and pipelines and whether these will be located above ground or below the ground.

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