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reference	LS14/2/6/1/7/2/559-134_residential_Rooi-els
date	16 January 2025

Lornay Environmental Consulting
P.O. Box 1990
Hermanus
7200

Attention: Michelle Naylor
By email: michelle@lornay.co.za

Dear Ms Naylor

**Amendment Application for a Dwelling and Ancillary Structures on Portion 134 of Farm 559, Rooi-els
(DEA&DP ref: 16/3/3/6/7/1/B2/32/1531/22)**

CapeNature would like to thank you for the opportunity to comment on the application 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 application.

Partial environmental authorisation was issued for the application on 26 April 2024, with authorisation issued for the dwelling but not the vintage vehicle storage garage located in a separate building and development node. Subsequently the applicants have revised the development proposal to allow for the development of the both the dwelling and the vintage vehicle garage within the footprint which was approved for the dwelling.

CapeNature was not in support of the vintage vehicle garage in the separate footprint due to the high sensitivity of the property which is all Critical Biodiversity Area I (CBA) which requires that the development footprint should be minimized as far as possible. The footprint for the dwelling and outbuildings and lawn/grass blocks was relatively large and the boundaries of this footprint was designated by both the botanical and freshwater specialists. As a result of the large size of the approved footprint, it was possible to design the proposed dwelling and garage within the approved footprint.

The impacts on biodiversity for the revised proposal in the amendment application can be considered the same as for the approved footprint of the dwelling, since the footprint of loss of habitat will be the same. We do however wish to note that an additional potential impact associated with the garage is the potential pollution from hydrocarbons. The risk can however

be minimized through implementation of appropriate mitigation, which we recommend should be included as an added mitigation measure for the operational phase. We further wish to note that our comments on the Draft Basic Assessment Report (13 September 2023) advised that the private vehicle storage should be accommodated within the dwelling footprint.

Fire risk was a major concern with regards to the vehicle storage facility. The applicant will be implementing best practice fire prevention measures including sprinkler systems and an evacuation plan for the vehicles. The applicant has further agreed to enter into a firebreak agreement with CapeNature as the Kogelberg Nature Reserve managed by CapeNature borders on to the property, which CapeNature considers as essential mitigation.

In conclusion, CapeNature does not object to the proposed amendment and advises that the impacts associated with the amendment can be considered as the same as for the component which initially received environmental authorisation. All existing conditions should remain relevant.

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

Regards

A handwritten signature in black ink, reading "RSmart". The signature is written in a cursive, flowing style.

Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Steve Gildenhuys, CapeNature

Bernadette Osborne, Department of Environmental Affairs and Development Planning