Environmental Management Framework: Cape Winelands District Municipality

Comments and Responses Report – Status Quo

Report Prepared for

Cape Winelands District Municipality

Report Number 410438/2

Report Prepared by

srk consulting

September 2011
Environmental Management Framework: Cape Winelands District Municipality
Comments and Responses Report – Status Quo

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SRK Project Number 410438

September 2011

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1. Introduction

The Cape Winelands District Municipality (CWDM) appointed SRK Consulting (SRK) to develop an Environmental Management Framework (EMF) for the eastern portion of the CWDM including the Witzenberg, Breede Valley and Langeberg Local Municipalities (but excluding the Drakenstein and Stellenbosch Municipalities).

The Draft Status Quo Report, which represented the first milestone in the project, was released for a 60 day public comment period on 26 May 2011, prior to which the Report had been reviewed by the Project Steering Committee (PSC).

This Comments and Responses Report was compiled following the completion of the public review period and aims to:

- Summarise the formal comments on the Draft Status Quo Report made by Interested and Affected Parties (IAPs), key stakeholders and members of the PSC;
- Provide responses to the comments received; and
- Present the written submissions.

The consultation process that was followed is documented in detail in Section 2.3 of the Draft EMF Report (SRK Report Number 410438/3).

2. Comments Received

Written comments on the Draft Status Quo Report were received from 11 stakeholders, as indicated in Table 1, while a number of other parties requested registration as IAPs. All written comments have been attached as Annexure A.

Table 1: List of stakeholders who submitted comment on Draft Status Quo Report

<table>
<thead>
<tr>
<th>Name</th>
<th>Affiliation</th>
<th>Date of comment</th>
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<tbody>
<tr>
<td>Charl de Villiers</td>
<td>Agri Western Cape</td>
<td>5 April 2011</td>
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<tr>
<td>Elkerine Rossouw</td>
<td>Breede Overberg Catchment management Agency (BOCMA)</td>
<td>6 April 2011</td>
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<tr>
<td>Beatrice Conradie</td>
<td>UCT, on behalf of Agri Western Cape</td>
<td>21 April 2011</td>
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<tr>
<td>Dawid Smit</td>
<td>Western Cape Bee Industry Association</td>
<td>29 May 2011</td>
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<tr>
<td>Chris Krone</td>
<td>-</td>
<td>5 June 2011</td>
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<tr>
<td>Duncan Barry</td>
<td>BAR Valley Breeders</td>
<td>21 June 2011</td>
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<tr>
<td>Alana Duffel-Canham</td>
<td>CapeNature</td>
<td>30 June 2011</td>
</tr>
<tr>
<td>Louis Bruwer</td>
<td>Central Breede River Water Users Association (CBRWUA)</td>
<td>12 July 2011</td>
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<tr>
<td>George Sieraha</td>
<td>Cape Heritage &amp; Development Forum (CHDF)</td>
<td>1 August 2011</td>
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<tr>
<td>Michael John Jakins</td>
<td>Ashton Resident</td>
<td>31 August 2011</td>
</tr>
</tbody>
</table>

3. Comments and Responses

Comments raised by stakeholders are summarised and categorised (for ease of reference) in the Comments and Responses Table presented below (Table 2).
### Table 2: Comments and Response Table – Draft Status Quo Report

<table>
<thead>
<tr>
<th>ID</th>
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<tr>
<td><strong>Preface</strong></td>
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<tr>
<td>1</td>
<td>vi</td>
<td>[Suggested addition]: “Implementation of the EMF will be informed by environmental management objectives and guidelines to aid planning in different environments in the Cape Winelands District Municipality.”</td>
<td>Charl de Villiers (Agri Western Cape)</td>
<td>This has been added in the preface, as suggested.</td>
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<tr>
<td><strong>Chapter 1: Introduction</strong></td>
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<td>2</td>
<td>1</td>
<td>Need to find more suitable, less abrasive alternative to ‘conflict’ – applies throughout document. ‘Competing’ land uses; ‘competition’ between agricultural and conservation priorities...?</td>
<td>Charl de Villiers</td>
<td>Agreed, changes have been made, where appropriate.</td>
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<td>How about.... “The CWDM lies within the Cape Floristic Region, a global biodiversity hotspot, where natural ecosystems and agriculture co-exist in a difficult but mutually dependent relationship. Agriculture is dependent on a host of ecosystem services such as water provisioning, pollination and flood attenuation. Many of the region’s most threatened natural areas, in turn, are entirely dependent on conservation efforts by private landowners....”</td>
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<td>3</td>
<td>1</td>
<td>ToR for CWDM EMF were written from agricultural perspective but apply to the entire municipal area. I think the urban dimension and especially poorly planned urban expansion as a source of environmental change and degradation also need to be given prominence in the Introduction (cf. reference to ‘rapid urban expansion’ under 7.4, Pressures and Trends.</td>
<td>Charl de Villiers</td>
<td>Agreed. The pressure on natural resources resulting from expansion of urban areas has been noted in the introduction.</td>
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<td>4</td>
<td>1</td>
<td>Conflict between agriculture and the environment may be overstating the current situation, but unless the environmental regulator takes cognisance of the financial drivers shaping agriculture, what could be an amicable relationship leading to a win-win development opportunity could deteriorate to open conflict. From the farmer’s point of view appropriate development is more wine grapes and developing pristine natural environments into farm-based tourism opportunities. The latter creates employment (and a separate income) for women who are often counted as financially vulnerable. Key in avoiding conflict is to be explicit about land for further agricultural and farm-based tourism development. The report is entirely silent about this. From</td>
<td>Beatrice Conradie (UCT, on behalf of Agri Western Cape)</td>
<td>The purpose of the Status Quo report is to investigate and describe the current situation in the study area. Identification of land suitable for the expansion of agricultural and related activities will be addressed in the EMF itself. The EMF also identifies the sensitivities of various parcels of land (and associated environmental attributes) to “a change in land use”, whether it be transformation to urban or agricultural uses.</td>
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<td>agriculture’s point of view it is more important to say what can be developed than what can’t be developed.</td>
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<td>5.</td>
<td>3</td>
<td>The CWDM DMA is a huge area – what is its aerial extent? Its geography is certainly a factor that influences planning and service delivery.</td>
<td>Charl de Villiers</td>
<td>The DMA as presented in the Status Quo report measures approximately 1.1 million ha or 54% of the study area. Following the municipal elections in May 2011, the DMA was split and incorporated into the existing surrounding municipalities (most of it into the Witzenberg Municipality). This has been reflected in the EMF Report. The information presented in the Final Status Quo Report is however still based on the “old” municipal boundaries, and thus still includes the DMA.</td>
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<td>6.</td>
<td>3</td>
<td>“The Drakenstein and Stellenbosch Municipalities are excluded from the study area”? The Cape Heritage &amp; Development Forum (CHDF) takes heed of the reason but feels that these areas should be incorporated into one study and should not be dealt with in isolation under a different “EMF” umbrella. There should be total cohesion.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>The boundaries of the study area for any EMF could be determined for example by the natural boundaries of a specific environmental feature (such as a biome or catchment) or administrative boundaries (such as those of a local or district municipality). In reality, the study area for each EMF will be determined by a number of factors, such as the proponent commissioning the EMF, the motivation for commissioning the EMF, available data for the area, budget and whether EMFs have already been undertaken for portions of the same or adjacent areas. Although it is agreed that the EMFs for any adjacent areas should not be undertaken in isolation but take cognisance of and link to each other, it is considered acceptable to undertake several EMFs for a very large area, as this allows more fine-scale investigation of any one area. In many ways, the environmental and social conditions are quite different in the Drakenstein and Stellenbosch Municipalities compared to the rest of the CWDM, as they are divided by a mountain range from and have much stronger economies and higher population densities than the rest of the CWDM. As such, the proponent’s decision to exclude those municipalities from this EMF, on the grounds that they are in the process of undertaking separate EMFs, is considered to be defensible.</td>
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<td>7.</td>
<td>6</td>
<td>1.6 Objectives of this report – maybe you can add a paragraph below the bulleted list that summarises the next phase. Creates a sense of purpose and anticipation in the mind of the reader.</td>
<td>Charl de Villiers</td>
<td>This has been added.</td>
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<td>8.</td>
<td>6</td>
<td>“…once the EMF has been adopted it must be implemented and monitored on a regular basis”. The CHDF would like to know how this will be monitored and what set of criteria will be implemented to check the fact that the EMF is</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>It is agreed that the implementation of the EMF as well as the accuracy of the EMF need to be monitored to ensure that the tool is working effectively and contributes to better spatial planning and decision-making.</td>
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<td>working. This is critical as to its success. If no checks and balances are implemented the EMF is doomed to failure.</td>
<td></td>
<td>The EMF Report contains an Implementation Plan in Chapter 6 which specifies out how the EMF should be implemented as well as the roles and responsibilities of the various stakeholders in the use and monitoring of the EMF. To ensure that the information contained in the EMF remains accurate and current, the EMF must be reviewed and updated at least every 5 years in alignment with the review cycle for the SDF.</td>
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<td>Chapter 2: Approach and Methodology</td>
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<td>9. 7 2.1 “...Sensitive environments may coincide with areas of high potential for development...”. This could be a potential red light. From past experience all types of reasonings within EIA reports are used to justify development into sensitive areas. The land is fallow and of low agricultural yield etc.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>The social and environmental costs and benefits of a proposed development need to be weighed up by the relevant authorities when making decisions on whether or not to approve an application. The EMF will identify land uses that are considered suitable and unsuitable in certain areas, based on the sensitivity of various environmental attributes, which is intended to facilitate such decision-making.</td>
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<td>10. 7 “The GIS platform?” The concept of an electronic map is a good idea. The CHDF would also like to understand based on the “overlay” what will be the set of criteria that will determine definite no go areas? This will be critical to determining if development should go ahead in these sensitive areas.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>The methodology of how the environmental attributes were derived, grouped and rated to create the composite sensitivity map will be presented in the EMF Report. However, the EMF will not identify ‘no go’ areas per se, as development can take many forms that will have different degrees of impact on different types of environments. The EMF rather identifies land uses that would not have a significant impact, that may have a significant impact or that are thus desirable or undesirable in particular environments.</td>
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<td>11. 9 2.2.3 Phase 3: EMF – Make sure that the term ‘Environmental Management Impact Zones’ is used consistently throughout the document. I’d suggest a re-wording to the fourth bulleted item... “Identification and mapping of Environmental Impact Management Zones which indicate areas with similar environmental attributes and therefore similar management objectives...” (I hope this is so; crucial to logic underpinning the EMF).</td>
<td>Charl de Villiers</td>
<td>Amendments have been made and the term “Environmental Management Zones” is used consistently throughout the document as well as in the EMF.</td>
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<td>12. 9 “GIS tool to be available free via a GIS viewer package”. Is this only to municipalities and officials? If yes then the CHDF objects. It should be available to all communities especially to communities that have a keen interest in their specific area.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>The availability of the GIS tool to the general public will depend on the available technology and administrative capacity in the local and district municipalities, which needs to be determined by the municipality when the requirements are better understood. The administrative arrangement to ensure that all parties with copies of or access to the GIS tool can be made aware of any updates to the tool will also need to be finalised, to ensure that there is only a single version of the</td>
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<td>13</td>
<td>13</td>
<td>“…vast areas remain unsurveyed, areas which have been surveyed show a rich archaeological potential…” CHDF states that the unsurveyed areas should receive priority to have them studied for this potential. If not then these areas stand a chance of being developed without due process and thus lose another important part of our heritage.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>GIS tool being used by all parties. Options of allowing access to the GIS tool from a central, controlled point will thus need to be investigated further.</td>
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| 14 | 13 | 2.4.2 “…the EMF will not report in detail on areas within towns and settlements in the CWDM”. Why are certain areas excluded but included under a separate umbrella? Within these areas exist the same issues as areas included in the study. Once again, all areas need to be encompassed within the EMF study. The CHDF feels that you cannot have different sets of rules and regulations for the same type of issues based in different zones. | Cape Heritage & Development Forum | The EMF’s focus on rural areas is considered appropriate in this instance as:  
• Rural areas make up some 99.5% of the study area;  
• Urban areas typically experience different pressures and conditions than surrounding rural areas (they are more transformed, whereas rural areas retain larger segments of natural environment);  
• Urban areas serve a different function (e.g. residential development within urban areas is generally encouraged, whereas it is discouraged in areas outside of the urban edge);  
• Zoning of properties and regulation of activities is often better developed in urban areas than in rural areas; and  
• Spatial information on environmental attributes is often not available at a sufficiently fine scale for areas inside the urban edge. |
<p>| 15 | 14 | “There is limited information available pertaining to cultural heritage in the study area”. The CHDF is very concerned with this limited information. It is also alarming to note that there has been no systematic archaeological surveys done within the CWDM. It is also alarming to note that very few Archaeological Impact Assessments (AIAIs) have been done. Without these studies the EMF remains incomplete and it also leaves these potential areas to be developed without any guidelines which could lead to a possible desecration of heritage areas. | Cape Heritage &amp; Development Forum | See response to Item 13 above. In the light of limited information on archaeological and heritage features in the study area, the EMF has identified cultural landscapes and historic and scenic routes which are likely to contain many if not most heritage features in the area, and those that are most likely to come under development pressure, if at all. The EMF Report will specify management guidelines for land uses and activities in these areas, as well as those land uses for which more detailed studies (e.g. of heritage features) are recommended. The EMF is a living document and future research and findings should be incorporated into the EMF in subsequent updates. |</p>
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<td>16.</td>
<td>15</td>
<td>Bottom right. Suggest a rewording.... “For planning purposes, the vegetation types of the Western Cape can be arranged into six ecosystems with broadly similar ecological characteristics and management requirements, i.e. coastal, lowland fynbos, midland and mountain fynbos, renosterveld, succulent karoo and mainland thicket ecosystems...” The reference that should be used here is the <em>Fynbos Forum ecosystem guidelines</em> (De Villiers et al, 2005). The map can be attributed to SANBI BGIS.</td>
<td>Charl de Villiers</td>
<td>These changes have been made.</td>
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<td>17.</td>
<td>15</td>
<td>“Eleven main crops, largely fruit and grapes, are grown on 89% of the total agricultural land area...of which only 19% is high potential arable land (CWDM 2010)”. If 89% is currently being used to grow crops as mentioned but only 19% has high potential is the CHDF led to believe that the remaining 70% is viewed as potential land to be developed? If this is the case the then CHDF is vehemently opposed to this. South Africa has less than 3% agricultural land left so if land is deemed to be of a low grade it is of no consequence. If crops can grow in low grade soil then so be it. Agriculture is agriculture. Food security is fundamental. Cape Heritage &amp; Development Forum</td>
<td>This statement is applicable to the entire Western Cape Province and not just the CWDM. It was included in the chapter presenting the <em>Regional and Planning Context</em> which provides the context for the study area. As the Western Cape is not the subject of this EMF, it was not investigated and no recommendations are made regarding the province as a whole. It must also be noted that the classification of 'high potential arable land' often does not do justice to the actual potential of the land, as grapes and certain other crops often prefer soils that are traditionally classified as 'low potential'. Water availability, slope and temperature are other important determinants of the actual agricultural potential of an area, and of which crops are most suitable. As such, this is a very general statement about agriculture in the Western Cape, in line with the broad description of other features of the Western Cape in this same section.</td>
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<td>18.</td>
<td>19</td>
<td>“Urban Restructuring Objectives – End the apartheid structure of urban settlements”. The CHDF finds this statement very vague. This is a study all on its own. Can more clarity be provided regarding this statement and how this will be accomplished?</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>This is one of the nine strategic planning objectives quoted in the Provincial Spatial Development Framework, which thus applies to the entire Western Cape Province. As the EMF does not investigate the planning within or potential restructuring of urban areas in the study area in detail, this objective is of less relevance to the EMF but has been included for completeness and to provide the planning context.</td>
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<td>19.</td>
<td>19</td>
<td>“Cease urban development outside of urban edges”. This is a very important statement but it is another thing maintaining it. Over the past few years certain politicians and officials have been hell bent on moving urban edges for whatever reason. Urban edges are there for a reason especially edges that protect sensitive, heritage and agricultural areas. One of the current</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>EMFs are part of a suite of Integrated Environmental Management (IEM) tools that support informed and integrated environmental decision-making. Once completed, the Minister may adopt the EMF, following which the EMF must be taken into account in the consideration of applications for environmental authorisation in or affecting the geographical area to which the EMF applies. As such, the EMF will</td>
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<td>administration’s objectives is MAJOR developments. This EMF needs to protect areas that need protecting at all costs and this EMF should not just be a framework of words without positive action. The enforcement of the EMF is the critical factor.</td>
<td></td>
<td>not be a tool that can protect areas ‘at all costs’, but it will highlight to decision-makers (and other relevant parties) areas that are environmentally sensitive due to a range of relevant environmental attributes. More detail will be provided in the EMF Report.</td>
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<td>20</td>
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<td>“A portion of the Breede River Valley and Witzenberg Municipalities fall within the boundaries of the CWBR [Cape Winelands Biosphere Reserve] although the majority of the reserve lies outside the study area”. Once again the CHDF state that this does not make sense. As stated in point 2.4.2 above all areas need to be encompassed within the EMF study. The CHDF feels that you cannot have different sets of rules and regulations for the same type of issues in different zones.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>Your concern has been noted. However, the response to comment 6 above once again applies. The biosphere reserve has its own set of rules and regulations, which would also be applicable to those portions of the biosphere reserve which fall inside the study area.</td>
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<td>21</td>
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<td>“Buffer Area: Most of the private land constituting the buffer area is zoned for agricultural purposes”. Good, lets keep it that way.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>It must be noted that most rural land was historically zoned for agriculture, and this does not necessarily indicate whether or not the land is suitable for agriculture or if this is an actual, historical or desirable land use. Even if an area is zoned for agriculture, an environmental authorisation must be obtained prior to ploughing the land if it has not been cultivated in the preceding 10 years.</td>
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<td>22</td>
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<td>“The CWBR should not be seen as isolated from its surroundings but as an integral part of the regional planning and development strategy aimed at promoting sustainable development”. This is a MAJOR RED LIGHT for the CHDF. The CWBR was registered at UNESCO on the 18th September 2007 and thus listed on the World Network of Biosphere Reserves. In the CHDF mind this area is protected so could even the mention of sustainable development even be proposed? (stand under correction) Is the CWBR outside the urban edge? Clarity is required please.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>The CWBR encompasses mostly the Drakenstein and Stellenbosch Municipalities and, as such, a wide range of land uses, including natural (and in some instances protected) areas, large agricultural areas and urban areas (Stellenbosch, Paarl and Wellington). As such, the CWBR is not synonymous with a protected area, and the programme encourages the identification of sustainable and compatible land uses. Various zones are identified within the CWBR, namely a core area, which includes statutory conservation areas, a buffer zone, which includes public (local authority) and private nature reserves, conservancies, mountain catchment areas, as well as transition areas which include agricultural areas and associated activities. Biosphere reserves are thus not limited to conservation only, but allow for compatible land uses in various zones.</td>
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<td>23</td>
<td>21</td>
<td>Bottom right. ‘Conflict’ can be replaced with ‘incompatibility’</td>
<td>Charl de Villiers</td>
<td>This has been amended.</td>
</tr>
<tr>
<td>24</td>
<td>22</td>
<td>3.4.1 Key strategic planning docs Add draft Western Cape Rural Land Use Planning and Management Guidelines (DEADP, 2009) at the end of the bulleted list. They’re important because they seek to give effect to the strategic objectives of the PSDF rural</td>
<td>Charl de Villiers</td>
<td>Both the PSDF and guidelines have been included.</td>
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<td>areas, beyond the urban edge. The <strong>PSDF</strong> should be included up-front because it’s the foundation framework plan for the province, and was approved by Min. Bredell as a LUPO s 4(6) structure plan in June 2009.</td>
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<td>25</td>
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<td>3.4.1 • “Cape Winelands District Integrated Development Plan (IDP); • Cape Winelands District Spatial Development Framework (SDF); and • Strategic Environmental Assessment (SEA) for the Cape Winelands District Municipality. Each of these is considered to be a “living” document, to be reviewed regularly to include new information, and a key component of an integrated set of strategic documents.” The CHDF hopes that the statement “living document” does not mean that the EMF can be used as a tool to desecrate urban edges inclusive of agriculture and eco sensitive areas.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>Urban edges, as well as other planning instruments and the EMF, have to be regularly reviewed by law to ensure they are adequate to address social and environmental pressures and needs, which may change over time.</td>
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<td>26</td>
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<td>Table 3-2. Maybe should be expanded to include reference to the ‘spatial planning categories’ (SPCs) provided for in the PSDF and rural land use guidelines, viz. Core 1, Core 2, Buffer 1, Buffer 2, etc. These guidelines are based on the categories that underpin Critical Biodiversity Area (CBA) maps (CBAs, Critical Ecological Support Areas (ESA), Other Ecological Support Areas, etc – NB these are being revised and may be reduced to just CBAs, ESAs, Other Natural Vegetation, etc). Whereas CBA maps depict priority areas for biodiversity conservation, the SPCs close the gap between biodiversity conservation and development planning by assigning land-use planning objectives to their biodiversity equivalents. The Department of Environmental Affairs and Development Planning (DEA&amp;DP) expects all SDFs to use this system, and the EMF should follow suit. See attached table that summarises the relationship between CBA maps and SPCs. I don’t think the EMF must be permitted any discretion w.r.t. the use of SPCs. The CSIR SEA precedes the land use guidelines and the EMF needs to be</td>
<td>Charl de Villiers</td>
<td>The EMF has made use of the CBA categories, both because these are considered to be the environmentally more relevant categories and because SPCs have not yet been delineated and determined for the study area. While Table 3-2 is not considered to be the best place for highlighting the parallels between CBA categories and SPCs, this has been done in the EMF Report. The CBA categories, ecosystems defined by the Fynbos Forum guidelines and the Fine Scale Planning (FSP) guidelines for freshwater ecosystems have all been taken into account in the determination of Environmental Management Zones, which are presented in the EMF Report.</td>
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<td>close aligned with the latter policy. In broad, I see the Environmental Impact Management Zones fitting into each other like this: (1) CBA maps for the respective CWDM municipalities &gt; (2) CBA etc management objectives &gt; (3) SPCs and their objectives and guidelines for the corresponding CBA, ESA, ONV etc. Where possible, Environmental Impact Management Zones must be defined by an area’s CBA status (which provides the strategic planning context) and the type of affected ecosystem defined either by the Fynbos Forum guidelines, or the Fine Scale Planning (FSP) freshwater guidelines w.r.t. river channel types and wetland types (which sets management objectives, and introduces the relevant land-use etc guideline).</td>
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<td>27</td>
<td>24</td>
<td>“Integration – That spatial planning, land use management and land development be aligned and combined into a unified entity”. This can only work if all areas are encompassed into the study area. As per this document certain demographics are not included but will be dealt with under a different umbrella. Based on this factor the EMF will be incomplete.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>Your concern has been noted. However, this is an overarching principle, and the responses to comments 6 and 14 refer.</td>
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<td>28</td>
<td>25</td>
<td>LandCare area-wide planning has an established presence in the Upper Breede River Valley and should be included among the planning instruments. It is not sanctioned by any law, but it arguably represents one of the most successful and enduring examples of sector-specific spatial planning in support of co-operative resource governance in the W Cape.</td>
<td>Charl de Villiers</td>
<td>This programme is included in the list of relevant policies, guidelines and initiatives in Annexure C of the Status Quo Report.</td>
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<td>29</td>
<td>25</td>
<td>“The EMF will not represent an environmental policy and action plan but will aid facilitating a consistent approach to the consideration of environmental issues in the review of IDP’s and SDF’s which are to take the EMF into consideration” The CHDF feels that this is such a contradiction in terms. EMF = ENVIRONMENTAL MANAGEMENT FRAMEWORK. So the question bears, the policy that should represent exactly what it stands for does not have representation and environmental policy so the CHDF can only but conclude that this EMF is geared towards development and all “other” policies caught in the peripherals as stand alones and not encompassed within this EMF - dangerous and leaves the door open for interpretation which can lead to development in agricultural and eco sensitive areas. An Action Plan is a</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>Your comment has been noted and many aspects thereof are reflected in the EMF Report. We would thus like to refer you to that report and request you to restate your comments following public review of the draft EMF Report, if they have not yet been adequately addressed.</td>
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<td>natural part of this framework. How can one put together an Environmental Framework without an action plan? The CHDF feels that there should be an overarching environmental framework which will include the action plan. The EMF should be a one stop shop. Keep it simple. Encompass all stand alone policies applicable under the umbrella of this EMF. It should however be viewed as a complete package (one stop shop) as it were. This should be considered. Too many peripherals and reliances of “other” pertinent policies can lead to confusion and it is very labour intensive.</td>
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**Chapter 5: Geology, Topography and Climate**

30. 29 5.1.1 Mineral deposits. Mining of alluvial deposits by quarrying companies etc in foothill rivers in the CWD is apparently a growing problem -- Elkerine Rossouw at BOCMA will have more on this.

31. 32 The Klein Roggeveld Mountains (~1 200 amsl) should be added as they define the eastern extremity of the Ceres (Tankwa) Karoo and the DMA where it borders the Northern Cape.

32. 35 5.3 Soils. I've asked Elsenburg to provide common examples of the corresponding agricultural classifications (Glenrosa, Mispah, Hutton, etc) for the respective structural definitions of different soils (p 35). This will help to tie the EMF into agricultural land management (one person's habitat is another's terroir...).

33. 36 5.3.1 Soil Types "Soil types are important as they provide a supply of water, anchorage in the ground and a source of nutrition, which, together with climate, determines the vegetation types that can be supported". As commented under pg 15, even low grade agricultural land should not be desecrated at a whim to allow development. We only have less than 3% agricultural land left. Developers and officials are quick to use the excuse of "low yield" soils. Once again agriculture is agriculture. If soil can support a crop KEEP IT!

34. 38 5.3.2 Land Degradation: “South Africa’s soils are generally very vulnerable to land degradation and have low resilience (recovery potential).” Does the CHDF take this to mean that South Africa is so unique compared to the rest | Cape Heritage & Development Forum | Your concern has been noted, and the response to comment 13 partially applies. |

Charl de Villiers | The mining of alluvial deposits has been included in the lists of pressures and trends affecting a number of the key environmental attributes in the area. |

Charl de Villiers | These mountains are located outside of the study area on the border between the Northern Cape and the Central Karoo District Municipality and are thus not displayed on this map. |

Charl de Villiers | At the subsequent meeting with the Project Steering Committee (PSC), Charl indicated that this would in fact not be practical, and this change will thus not be made. |
### Chapter 6: Hydrology

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<td>35</td>
<td>41</td>
<td>6.1.2 Rivers. Strongly recommend that FSP classification of river channel types (cf. Job et al., 2008) be used as basis for setting management objectives and providing associated land use guidelines. See the river management guideline at the back of the FSP rivers’ doc. Like wetlands (Table 6-2, p 47) rivers should be classified in terms of the different channel types; mountain, upper and lower foothill and lowland rivers. The FSP guidelines sets management objectives for each (water quantity, quality, env [sic] flow requirements, erosion and sedimentation, connectivity and riparian habitat; Liz Day has also informally come up with objectives for maintaining floodplain processes). This is a fantastic product, and approach, for guiding EA and land-use, especially when supported by the management objectives for aquatic CBAs and ESAs. See attached example of how objectives-led river management was used as a screening matrix to select best option for soil cons[sic] works in foothills rivers in Breede WMA (De Villiers and Day, 2011). I think this approach can be used very fruitfully in the next phase of the EMF project, but its foundation must be laid in the status quo report.</td>
<td>Charl de Villiers</td>
<td>Your comment has been considered and addressed in the next (EMF) stage of the process. We believe that the Status Quo Report has laid the foundation for the use of those guidelines and information sources in the EMF Report.</td>
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<tr>
<td>36</td>
<td>43</td>
<td>Ecological importance of catchments and rivers. Maybe something should be added about the socio-economic value of the CWDM’s rivers. I’m a bit concerned that we’re caught up in the logic of a zero-sum game, humans pitted against nature, and ruining it. The EMF should possibly be seeking to break with our established forms of commonsensical thinking and instead recast biodiversity in the language of the Millennium Ecosystem Assessment: human wellbeing is linked to the state of ecosystem services and, hence, the state of biodiversity (cf. Scholes RJ and Biggs R (eds)(2004) Ecosystem Services in Southern Africa: A Regional Assessment – the regional-scale component of the Millennium Ecosystem Assessment. CSIR, Pretoria)</td>
<td>Charl de Villiers</td>
<td>It is agreed that the wellbeing of humans and of nature are linked. The introduction to the Hydrology chapter states that “Water resources play a fundamental and crucial role in each ecosystem, as water sustains the life of plants and animals. In addition, they are also crucial to the wellbeing of humans, as water is essential for human survival. Water is also vital for cultivation, processing and manufacturing activities, which drive the economy of the CWDM. The river systems of the study area are also important for tourist and recreational activities and contribute to the sense of the place of the CWDM (Aurecon, 2009).”, which is believed to capture that point. The section mentioned in the comment does refer specifically to the ecological importance of rivers and catchments, as identified by the National Freshwater Ecosystem Priority Areas (NFEPAs) project.</td>
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<td>37</td>
<td>43</td>
<td>The second last paragraph needs to be restructured as it is not clear.</td>
<td>Breede-Overberg</td>
<td>This has been amended.</td>
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<td>38</td>
<td>46</td>
<td>Table 6-3: The yield of the Greater Brandvlei is shown to be 155 million m(^3)/a. At what assurance? In fact the total present allocation to irrigated agriculture from the Greater Brandvlei GWS amounts to some 214 million m(^3)/a, at an assurance of supply 91%.</td>
<td>Louis Bruwer (Central Breede River WUA)</td>
<td>This figure was taken from the Breede Overberg Catchment Management Agency (BOCMA) Water Management Area (WMA) Status Quo Summary Report dated March 2010. It has been provided for context and does not fundamentally influence the EMF, which does not assign sensitivities to areas based on available water quantities as this information is not available or reliable for all areas.</td>
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<td>39</td>
<td>48</td>
<td>6.1.3 “Wetlands are intrinsically valuable ecosystems that provide many important services to the environment and society” Wetlands must be protected at all times. If developments are to be allowed after a full comprehensive EIA process then it should only be allowed if it takes place between 100m to 200m from the wetlands, no exceptions. Wetlands are very vulnerable from sewerage and storm water seepage. This will have adverse effects on protected and especially red data species endemic to that particular area.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>Thank you for your comment. Issues regarding desirable and undesirable land uses in and near certain environmental features (including wetlands) are addressed in detail in the EMF Report.</td>
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<td>40</td>
<td>51</td>
<td>Aquifer vulnerability: Langeberg Municipality? Should this not rather read Langeberg Municipal area?</td>
<td>BOCMA</td>
<td>Throughout the Report, the term ‘Municipality’ has also been used to refer to the municipal area, which is widely accepted.</td>
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<td>41</td>
<td>51 &amp; 59</td>
<td>Ground water resources – Maybe the General Authorisation, Groundwater Taking Zones (DWA) should be mentioned here whereby a limitation is placed on the volume of extraction per hectare from certain areas within the study area.</td>
<td>BOCMA</td>
<td>This info was requested from BOCMA. The dataset is however not yet complete, and since it does not critically influence the EMF, it is not considered essential to include in the Status Quo Report at this stage. The mapping of registered water users and determination of water availability will however be listed as ongoing research to be consulted during the future review and update of the EMF.</td>
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<td>42</td>
<td>52</td>
<td>What are “temporary crops”?</td>
<td>Beatrice Conradie</td>
<td>This refers to areas not permanently used for crops and is a category provided in the data set that was used.</td>
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<td>43</td>
<td>52</td>
<td>Other agriculture users such as poultry farms and piggeries are increasing and play a major role on water abstraction and that of possible pollution of water resources.</td>
<td>BOCMA</td>
<td>This has been included.</td>
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<td>44</td>
<td>52</td>
<td>6.2: ‘The CWDM overlies the largest groundwater resource in the Western Cape, the Table Mountain Group Aquifer which originates in this area, as</td>
<td>Cape Heritage &amp; Development</td>
<td>It is agreed that groundwater underlying the study area is an important existing</td>
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<td>45</td>
<td>53</td>
<td>Storage of run-off in dams for town uses also has a large impact on the water availability within the river.</td>
<td>BOCMA</td>
<td>This has been included.</td>
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<td>46</td>
<td>54</td>
<td>Section 6.3.1: Surface Water Abstraction: The information by BOCMA that no further allocations can be made is incorrect. Detailed analysis that has been done by Aurecon for Central Breede River Water Users Association (CBRWUA) has shown that a further 33 million m$^3$/year can be allocated from Greater Brandvlei. In fact a license application has been submitted for this water.</td>
<td>Louis Bruwer (Central Breede River WUA)</td>
<td>Thank you for this information, which will be brought to the attention of BOCMA. It is not clear whether this comment refers to the statement in the Status Quo Report that a. “within the Breede WMA, any water that is still available has been allocated to meet future water requirements…” – which indicates that reserves are currently available but already ‘earmarked’ for future uses, or b. “BOCMA notes that there is no scope for further water abstraction during summer in all catchments falling within the study area.....” – which does not necessarily imply that there is not additional water available for allocation from the existing dams. As noted in response to comment 38, the information has been provided for context in the Status Quo Report and does not fundamentally influence the EMF, which does assign sensitivities to areas according to available water quantities, as this information is not available or reliable for all areas.</td>
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<td>47</td>
<td>54</td>
<td>Future water availability: “The surface water in the study area is a critical economic resource that is in increasingly short supply. A water balance provides an indication of the available water yield of a system versus the current water requirements.” For any future developments within designated areas which are permissible the availability of water resources should seriously be considered. Don’t just</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>It is agreed that water availability must be a critical factor considered by the authority when deciding on whether or not to approve a development.</td>
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<td>build and face the consequences afterward. This is critical!</td>
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<td>48.</td>
<td>62</td>
<td>6.4 Pressures and trends. Extra woes w.r.t. river management (courtesy WC Dept Agric). ...</td>
<td>Charl de Villiers</td>
<td>Thank you for the additional information, which has been incorporated in Section 6.4 on pressures and threats.</td>
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<td>Degradation of the riparian environment is variously attributed to:</td>
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<td>− Encroachment of farmland, chiefly vineyards, into the riparian zone;</td>
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<td>− Establishment of farm roads between vineyards and river banks;</td>
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<td>− Massive, flood-related erosion to particularly river banks and abutting floodplains;</td>
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<td>− A build-up of alluvium to a point almost level with the base of the vineyards;</td>
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<td>− Bulldozing of levees in channels to deflect floodwaters from vineyards;</td>
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<td>− Transverse bulldozing of the banks to widen rivers, thereby accelerating flood run-off;</td>
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<td>− Use of packed rocks to protect exposed banks against scour and erosion;</td>
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<td>− Invasion by woody alien plants and pioneer grasses and weeds; and</td>
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<td>− Inappropriately located or designed structures in the channel, including weirs, drifts and bridges.</td>
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<td>These drivers of habitat loss and degradation may function synergistically, as exemplified by the constriction-erosion-deposition-infestation-constriction etc cycle</td>
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<td>49.</td>
<td>63</td>
<td>“Planting more crops with a high water demand (e.g. fruit)” creates the impression that fruit is a water intensive crop. Compared to lucerne it is not. Also, it is impossible to produce any fruit without irrigation</td>
<td>Beatrice Conradie</td>
<td>Noted. Lucerne is however not a major crop grown in the study area, and this statement was merely to highlight the fact that additional irrigated crops, or crops with higher water requirements would place additional demands on the water resources of the area.</td>
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<td>50.</td>
<td>63</td>
<td>Infestation of water courses by alien species, both plants and animals, − Neglect of wetlands in the Western Cape (and elsewhere in South Africa), in spite of − Table 6-10 last bullet – grazing in and around wetlands − Climate change is predicted to result</td>
<td>BOCMA</td>
<td>These amendments have been made.</td>
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<td>51.</td>
<td>64</td>
<td>Table 6-10: “Activities impacting on wetlands in the study areas”. Any wetland that stands to be drained for agriculture should go through the full EIA process. But this should not just be an automatic process. If there are</td>
<td>Cape Heritage &amp; Development</td>
<td>Any activities within wetlands do indeed require an environmental assessment process as per the EIA regulations in terms of NEMA.</td>
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<td>52.</td>
<td>I did not see the mentioning of the current use (volume) used by the farming community for drinking water (households) or the negative impacts that the various uses may have on resources. These should form key elements when looking at creating a EMF that is usable by all sectors.</td>
<td>BOCMA</td>
<td>During subsequent discussions with BOCMA, they indicated that they would have this information available once the EMF undergoes its first review, and the data can thus be included at that stage. As per the response to comment 46, information related to available water quantity and similar aspects have not been used to assign sensitivities as this information is not available or reliable for all areas.</td>
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**Chapter 7: Biodiversity and Conservation**

| 53. | “From an ecological perspective the CWDM is an extraordinarily diverse area located on the transition between two of South Africa’s nine biomes (or major ecological regions), namely the Fynbos and the succulent Karoo biomes…” The stats (regarding the number of endemic vegetation types) speak for themselves. The endemic species are to be protected at all costs. The CHDF requests that a register be drawn up of the endemic species and gazetted for protection. | Cape Heritage & Development Forum | Noted. This is however well beyond the brief and scope of this EMF and CHDF should pursue this through another avenue is they so wish. |

54. | The organisation of veg [sic] types into ‘ecosystems’ is a device that originated in the Fynbos Forum guidelines and I’m not aware of it having been used anywhere else except in the grasslands biome, where the same is being done for grassland veg [sic] types. One of the main purposes of this artificial simplification of great veg [sic] diversity is to make life easier for planners and managers; it’s not a scientific product, but a pragmatic, management-driven one. I think the connection should be made round about here, or even earlier, between the different types of ecosystems and the management objectives and guidelines that will be developed later. This is the approach adopted by the Fynbos Forum guidelines: each ‘ecosystem’ is interpreted on the basis of eight standard questions relating to ecological functioning, key issues for development planning, and conservation and restoration. Precisely the same approach can be followed in the EMF. | Charl de Villiers | A note explaining the background to the ‘ecosystems’ referred to in the Status Quo Report has been included. The link between the ecosystems and management guidelines has been made in the next (EMF) stage of the process. |
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<td>55</td>
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<td>Table 7-3: Threatened Vegetation: All threatened vegetation types should be protected at all costs.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>The National Environmental Management: Biodiversity Act No. 10 of 2004 (NEM:BA) was promulgated in September 2004. The main objectives of the Biodiversity Act are to manage and conserve the biological diversity in South Africa and ensure that indigenous biological resources are used in a sustainable manner. In particular it aims to ensure that endangered species are protected. The Minister has published, in terms of section 56(1) of the NEM: BA, a list of critically endangered, endangered, vulnerable and protected species, in GNR.151 of 23 February 2007, as amended. All these categories fall within the definition of ‘protected species’ in section 1. The minister may in terms of section 57(2) prohibit an activity which is of a nature that may negatively impact on the survival of a listed threatened or protected species. Apart from that, in terms of section 57(1) no person may carry out a ‘restricted activity’ involving a specimen of a listed threatened or protected species without a permit. ‘Restricted activities’ are defined in section 1 and include the picking parts of, or cutting, chopping off, uprooting, damaging or destroying, any specimen of a listed threatened or protected species.</td>
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<td>56</td>
<td>75</td>
<td>Which problem animals? It is more likely to be baboons in the Cape Winelands than anything else, giving the major collapse in sheep and goat numbers according to the farm census.</td>
<td>Beatrice Conradie</td>
<td>According to the analysis undertaken by Aurecon (2009), such ‘problem’ animals include caracal, leopard and porcupine. This clarification has been included in the text.</td>
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<td>57</td>
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<td>7.3.1 Critical Biodiversity Areas: Protected Areas, Critical biodiversity and ecological support areas, other natural remaining, no natural remaining and urban areas should all be encompassed under the umbrella of the EMF and should enjoy the status of thorough investigation.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>Please review the EMF Report to understand as to how this was addressed.</td>
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<td>58</td>
<td>79</td>
<td>7.3.2 Protected and other conservation areas. “Although mountain catchment areas are formally protected, no regulations have been promulgated (e.g. to stipulate management obligations) and a distinction is therefore made between these areas and other protected areas that provide long term security of tenure in terms of biodiversity conservation” The CHDF states once again that this is such a contradiction in terms. How can areas be protected without regulations? Protection and regulations go hand in hand. If catchment areas are protected on what basis are they protected if there are no regulations?</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>Mountain catchment areas are one type of area that can be protected in terms of section 9(e) of the National Environmental Management: Protected Areas Act (No.57 of 2003) (NEM:PAA), which refers to mountain catchment areas declared in terms of the Mountain Catchment Areas Management Act (No.63 of 1970). Chapters 1 and 2 of NEM: PAA apply to mountain catchment areas, in terms of section 16. Effectively this means that declared areas should be entered on the Register of Protected areas, and any prescribed norms and standards apply to them. There are however none as yet. In the Western Cape Province, the Minister declared the areas situated in the Divisions of Worcester, Ceres, Robertson, Swellendam, Montagu, to be mountain catchment areas, the boundaries of which are shown on the sketch maps in</td>
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| 59 | 79   | 7.3.2. Protected and other conservation areas. “Other (non-declared) conservation areas in the study area include numerous Private Nature Reserves and a Private Game Reserve as well as a number of conservancies (not mapped), which entail cooperative landowner agreements with no legal obligations. These informally protected areas do not make provision for long-term security of tenure in terms of biodiversity conservation.

Table 7-6 provides a list of the formal Protected Areas (excluding non-declared conservation areas) that occur within the study area.”

The CHDF states that all private nature reserves must be regulated if they have any flora/fauna which are protected under the law. NO EXCEPTIONS. If this is not implemented farmers and landowners can decimate protected species at will without recourse. This will be highly undesirable and unacceptable. |
|     |      | Comment by | Response |
|     |      | Cape Heritage & Development Forum | Provision is made in the old Provincial Ordinances dealing with nature conservation for the declaration of private nature reserves. In terms of section 12 of the Western Cape Province’s Nature Conservation Ordinance (No. 19 of 1974), any owner of land may, with the approval of the responsible Minister and subject to such conditions as he or she may specify, establish a private nature reserve on land of which he is the owner and assign a name to such reserve. Any person who has established a private nature reserve shall manage, control and develop such reserve with a view to the propagation, protection and preservation of fauna and flora, and there are restrictions about hunting and picking flora in section 13.

In addition, management of protected species is also regulated by the NEM:BA. |
| 60 | 82   | 7.4 Pressures and trends. Wetland modification, etc -- “Alluvial ecosystems are degraded by changes to sub-surface hydrological functioning as a result of drainage in support of cultivation...” | Charl de Villiers | This has been included. |
| 61 | 83   | Threatened Fauna Habitat: The CHDF states that private landowners should be regulated when it comes to the protection of endangered species. NO EXCEPTIONS! | Cape Heritage & Development Forum | Please see the response to comment 55. This applies equally to private landowners in respect of a listed threatened or protected species on their land. |

**Chapter 8: Cultural Heritage Resources**

<p>| 62 | 84   | 8.1: Cultural Heritage Resources: The CHDF states that Heritage Western Cape (HWC) and SAHRA become involved in identifying special areas within the study area pertaining to heritage areas such as buildings/structures, caves and natural landscapes etc. An overarching HWC/SAHRA policy to protect special areas within this arena and needs to be encompassed within the EMF. (pages 85&amp;86 have an interesting rendition of times past which | Cape Heritage &amp; Development Forum | The NHRA makes provision for the management of heritage resources at a national, provincial and local level (i.e. by SAHRA, HWC and local authorities). The devolution of authority to the appropriate levels is hampered by lack of skills, funding and man-power. There is a need for strong local heritage societies and custodianship to partner with heritage authorities. |</p>
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| 63. | 86 | 8.2: “Palaeontology - ….particularly at risk of illegal collection of fossil material”  
What protection is provided to save this desecration? The CHDF must but accept that there is none. HWC and SAHRA to get involved. | Cape Heritage & Development Forum | The NHRA requires a permit for the collection or disturbance of any fossil material. |
| 64. | 86 | 8.3 “Archaeology – No systematic surveys have taken place in the study area…”  
As per the report there is a high archaeological potential regarding the study [sic]. The CHDF asks the question as to what is being done to create a register of all sites concerned. Without this the EMF is incomplete and invalid. It also leaves these areas wide open for desecration. | Cape Heritage & Development Forum | The implementation of archaeological impact assessments prior to developments is part of the management of the archaeological resource. The lack of systematic archaeological survey in the country as a whole is a limitation. It does not render the EMF incomplete or invalid. The response to comment 13 is also applicable. |
| 65. | 88 | Cultural landscape: “In South Africa, the human presence in the landscape is of great antiquity, extending back more than a million years. Embedded in the cultural landscape are the (end) products of human social interaction (cultural activities) e.g. rock art, stone tools, roads, historical houses, towns etc.  
The UNESCO definition of cultural landscape (Hart et al, 2010) also includes ‘wilderness landscapes’”.  
The CHDF states that these landscapes should be encompassed under the EMF and not under stand alone policies. This is critical. | Cape Heritage & Development Forum | These have been considered in the EMF, and where applicable and practical, management guidelines associated with key cultural heritage resources have been included in the EMF. |
| 66. | 92 | 8.5: Built Environment “Although the EMF will not focus on areas inside the urban edge, it is necessary to identify those towns with high heritage potential.”  
Another baffling statement. WHY? Refer to point 2.4.2 pg 9. HWC and SAHRA need to be fully involved (pg 92-96) | Cape Heritage & Development Forum | The Status Quo Report aims to present information on the current situation, which includes the existence of a number of features and towns with heritage value as well as the cultural landscape and sense of place. Key heritage features and historic towns are listed and described in the Status Quo Report, although the focus of the EMF is to inform changes in land use outside of the urban edge. |
| 67. | 93 | 8.6 Scenic Routes and Passes: “No scenic routes have been officially declared in the Western Cape to date”  
The City has a scenic route policy. This should be encompassed within the EMF | Cape Heritage & Development Forum | The City of Cape Town Scenic Route Policy is one of the main documents that have been used to inform the management guidelines associated with Historic and Scenic Routes in the study area in the EMF. |
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<td>68.</td>
<td>101</td>
<td>The water transporting infrastructure (pipes / pump stations) may be sufficient but most of it is old and will need to be replaced soon to keep it from deteriorating even further.</td>
<td>BOCMA</td>
<td>This information has been included.</td>
</tr>
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<td>69.</td>
<td>106</td>
<td>Solid Waste Disposal “Breede Valley Municipality: De Doorns (unlicensed)” The City is in breach of its own policies. The CHDF states that it must put its house in order.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>Thank you for the comment. The information on landfills has been provided for context in the Status Quo Report and does not materially influence the EMF itself.</td>
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<tr>
<td>70.</td>
<td>108</td>
<td>Centre pivots may be quite visible from the side of the road, but they are an entirely unimportant irrigation technology in the Western Cape.</td>
<td>Beatrice Conradie</td>
<td>Thank you for the comment. Text has been amended to reflect this.</td>
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<td>71.</td>
<td>109</td>
<td>“Despite the economic importance of agriculture, only some 5% of the land is under cultivation, with much of the rest currently not being suitable due to various constraints.” As stated before the CHDF states that it hopes this is not a precursor for unsustainable development? The CHDF encourages the expansion of agricultural land.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>Whether or not land is suitable for agriculture is not the only determinant of whether it is suitable for development. Other constraints to development, as well as the expansion of agriculture, include the possible presence of sensitive biodiversity or a lack of water. Please refer to the EMF Report for more detail.</td>
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<td>72.</td>
<td>110</td>
<td>Many farmers also include piggeries and poultry to their farming activities – these places as much strain on water resources and presents great pollution possibilities</td>
<td>BOCMA</td>
<td>This has been included in the hydrology chapter.</td>
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<td>73.</td>
<td>112</td>
<td>There are a couple of sand mining applications along the main tributaries to the Breede river. A lot of illegal sand mining is taking place as well for some time now.</td>
<td>BOCMA</td>
<td>Thank you, this has been noted in the Status Quo Report.</td>
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<td>74.</td>
<td>113</td>
<td>“Volatility in employment” is an overstatement on farms in the Breede (Conradie, 2007).</td>
<td>Beatrice Conradie</td>
<td>The statement refers to an increase in the volatility of employment, not necessarily a high level in absolute terms. This is based on the study by Murray (2010).</td>
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<td>75.</td>
<td>113</td>
<td>9.2.3 Mining: Should be checked and illegal mining clamped down on.</td>
<td>Cape Heritage &amp; Development Forum</td>
<td>Noted. Enforcement of legal mining practices can however not be done as part of the EMF process. Relevant legislation is in place to do so, and the purpose of the EMF (with respect to mining) is rather to identify areas in which mining may or may not have significant impacts or be considered undesirable due to incompatibility with other environmental attributes.</td>
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<td>76</td>
<td>Agriculture productivity: In addition to being rich in biodiversity, the Cape Winelands is home to agriculture which is substantially more productive than anywhere else in the rest of the province and country (Conradie et al, 2009a &amp;b). This has implications for employment (and job creation into the future), the demand for land for development as well as water use (since all of the profitable crops are irrigated).</td>
<td>Beatrice Conradie</td>
<td>This is agreed and one of the main drivers for undertaking the EMF.</td>
<td></td>
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<td>77</td>
<td>We need more clarity on property rights: For example, South Africa’s move from a water rights system to a system of licensing wiped out 50% of the water rights for irrigation on the Berg [River] without compensating farmers. NEMA is doing the same with arable land through its biodiversity regulations. How is the burden for providing a healthy environment spread across the state, agriculture and other sectors of the economy? Who owns the right to water savings being made on farms through improved irrigation efficiencies, and how much water can be saved this way?</td>
<td>Beatrice Conradie</td>
<td>It is agreed that the EMF will have an impact on the approval of future land uses, where such approval is required. The implications from any changes to the current policy must be considered by the policy makers, but are beyond the scope of the EMF. The EMF focuses on identifying environmentally sensitive areas and potentially suitable as well as potentially unsuitable activities therein.</td>
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<tr>
<td>78</td>
<td>Detail on the flashpoints and how they will be handled: The report pays lip service to the idea of the potential conflict between agriculture and the environment, without providing detail on where the real problems lie. Where is land abundant and water scarce? Where is water abundant and arable land scarce? Where is the rising temperatures quoted from Low et al (2007) likely to wipe out fruit production? Where has BWI and Cape Nature Stewardship secured sufficient conservation already, and where should more be done in order to protect high priority ecosystems? Where is further development likely to be approved, and where are the no go zones? What are the principles for approving development for one landowner and not for his or her neighbour?</td>
<td>Beatrice Conradie</td>
<td>Please note that these aspects are central to the EMF and will be addressed in the next (EMF) stage of the process. The Status Quo Report is not intended to resolve such issues.</td>
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<tr>
<td>79</td>
<td>Appropriate detail / disaggregation: The report creates the impression that olives are the Western Cape’s hope for the future. At the moment olives are too insignificant to appear either in the Abstract of Agricultural Statistics or the Farm Census. More data on current areas planted and recent expansion rates would provide a better informed description of agriculture for the province as a whole. Additionally, disaggregating these trends will reveal the almost insurmountable differences between magisterial districts in the Western Cape. Conradie et al (2009a) argued that magisterial districts are not always homogenous and therefore sometimes too big to be the appropriate unit of policy decision making. While the reasons for managing at</td>
<td>Beatrice Conradie</td>
<td>Olives are mentioned as one of several emerging niche markets and diversification strategies (others are essential oils, Buchu, cheese); it is not the intention to overstate their role or importance in the agricultural industry. The analysis of environmental attributes is done at a more local scale during the next (EMF) stage of the process.</td>
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<td>the district-level municipality are obvious in a scarce skills environment, managing the environment at that level runs the risk of responding to a meaningless average which local communities can ill afford.</td>
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<td>80.</td>
<td></td>
<td>Urban development as a threat to agriculture: It is a well known fact that urban sprawl threatens agriculture. For example, farmland in Wynberg Magisterial district fell from 12 789ha in 1976 to 4 555ha in 1981. Is there a similar threat in Stellenbosch/Kuilsriver, Paarl/Wellington and Worcester? What is projected urban water demand growth, and at what point will it begin to dry up existing irrigation in the Cape Winelands?</td>
<td>Beatrice Conradie</td>
<td>It is correct that urban development is a threat to agriculture. Stellenbosch, Kuilsriver, Paarl and Wellington lie outside of the EMF study area and are thus not investigated in detail. The report notes that many rezoning applications were received for Worcester, and other towns in the study area, around 2005. More detailed information regarding the number of applications and growth of towns is provided in the CWDM SDF.</td>
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**Chapter 10: Environmental Risks**

| 81. | 114 | Fire risk from alien vegetation is as much a risk to vineyards and orchards as to biodiversity. | Beatrice Conradie | This has been included. |
| 82. | 118 | 10.3 Flood risk. Gravel roads in the DMA are particularly vulnerable to flood damage as evidenced in 2008 and 2009 (WC Dept of Transport and Public Works). | Charl de Villiers | This has been included. |
| 83. | 118 | Touwsriver was totally shut off from civilisation for a long time during 2008 floods when an upstream dam broke its walls and flooded the Donkies river which cuts through Touwsriver. The Touwsriver was also in flood at the same time. The flood broke / displaced a large portion of the main drinking water pipeline providing Touwsriver with water from the Bokriver water treatment works. The town was without drinking water for a couple of weeks and received water via tankers from De Doorns. | BOCMA | This has been included. |

**Chapter 11: Interrelationships of Attributes**

<p>| 84. | 124 | 11.1.3 Role of Water Resources: <em>&quot;Without water there is no life&quot;</em> Statement speaks for itself. To be protected at all costs. | Cape Heritage &amp; Development Forum | Noted. |
| 85. | 124 | 11.3 Ecosystem services. In line with other comment re Millennium Ecosystem Assessment etc, I think it would strengthen the document, and particularly its enlightened approach to managing human-ecosystem interactions by moving the whole of 11.3 to Ch 7. I’d suggest that it be | Charl de Villiers | It is agreed that this section could be included elsewhere. However, after deliberation, we propose to retain the section on ecosystem services, which highlight the interaction between the ecosystem and humans, in the chapter on interrelationships between environmental attributes, while the preceding chapters |</p>
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<td>86</td>
<td>127</td>
<td>Apples, pears and plums are the only major crops relying on insect pollination.</td>
<td>Beatrice Conradie</td>
<td>Detail has been included in the report.</td>
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**General Comments (Not specifically linked at any chapter of the Status Quo Report)**

87. The input of Ms. Antonia Belcher, Aquatic Scientist, should be considered as she wrote the State of the Rivers Report for the Department of Water Affairs (DWA) on the Breede River during 2010. The document has not been published, and the information could therefore not be cross referenced with the EMF for comment. BOCMA | Ms. Belcher was contacted and a preliminary copy of the Report has been obtained from DWA. The information therein was checked against the Status Quo Report and incorporated where relevant. |

88. The input of Ms. Melissa Lintnaar-Strauss, Water Quality Officer, DWA should be requested for the rivers that fall outside of the boundaries of the BOCMA area. BOCMA | Ms. Lintnaar-Strauss has been added to list of key stakeholders and her comment was requested when the draft Status Quo Report was released for public comment. In addition a representative of DWA is a member of the Project Steering Committee, thus providing numerous opportunities for comment. SRK did however not receive any written feedback from DWA. |

89. Honeybees are crucial to Agriculture and Biodiversity (pollination) and need plants (including aliens) in the whole environment to survive. Catch 22 most of the time, but balancing the two can be done through properly taking note and compensating for it through planning and strategizing. Dawid Smit, Western Cape Bee Industry Association (WCBA) | Your comment has been noted. The EMF will assist those interested in identifying areas in which the planting of trees would be considered to be suitable, although it cannot go to the level of detail where exact locations suitable for the small-scale planting of bee-friendly tree are identified. However, such intervention, where feasible, should be pursued locally and within the context of the agricultural and natural environment. |

90. Ek meen dat ons hier te doen het met ‘n intensiewe vrugtestreek wat sensibiele areas insluit en dat ons wel ons insette sal moet maak. Ek is bereid om myself beskikbaar te maak, maar versoek dat ruim 2 maande kennis gegee moet word van vergaderings asook dat indien moontlik ek viraf geken sal word insake datum bepalings. So nie is my uitgangspunt dat nie prakties met landbou geskakel is om inklusiwiteit binne prosesse te verseker nie. Chris Krone, Agri Witzenberg Ceres DVL | Thank you very much for your willingness to participate in the project, which is appreciated as involvement by the agricultural community is crucial to ensuring that the EMF is a practical and useful tool. |

91. Please note the following in the EMF report, as it is a recurring issue with the Langeberg Municipality: Positioning a rubbish dump for Robertson, Ashton, McGregor, Bonnievale and Montagu just outside Robertson at the start of the travelling. Duncan Barry, BAR Valley | The Cape Winelands District Municipality has confirmed that the two most suitable sites for a district waste facility are in Worcester and Wellington. If a district facility is not developed, Langeberg Municipality will develop a landfill site close to... |
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<td>92.</td>
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<td>R317 Bonnievale Rd would be detrimental for a number of reasons, including: An adverse effect on the tourism trade and Safety to the residents of Nquebela and horses being bred in the surrounding area.</td>
<td>Breeders</td>
<td>Bonnievale. The site in Robertson is not being considered for a landfill site. (Note that in an EIA (undertaken by SRK) assessing the potential impacts of a landfill site in the Langeberg Municipality, the site in Robertson was considered the least preferred of three alternative sites assessed, and the Environmental Authorisation issued by the Department of Environmental Affairs and Development Planning was for the landfill to be placed on the site close to Bonnievale).</td>
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<td>93.</td>
<td></td>
<td>The report provides a comprehensive overview of the environment in the study area. We are pleased to note that the report has made extensive use of existing conservation planning products, especially the Biodiversity Sector Plans, which include Critical Biodiversity Area (CBA) maps and the National Freshwater Ecosystem Priority Areas (NFEP). It appears the Map 7-5 represents CBAs as combined terrestrial and freshwater CBAs and we would like to suggest that perhaps these should be represented as separate maps.</td>
<td>Alana Duffel-Canham, CapeNature</td>
<td>Thank you for your comment. Map 7-5 indeed represents combined terrestrial and freshwater CBAs. However, it is our understanding that this is the most typical representation of the CBA maps, which we also propose to include in the EMF tool itself. As such, we propose to retain the map as is in the Status Quo Report, unless this has distinct disadvantages of which we are not aware.</td>
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<td>94.</td>
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<td>Mining activities are increasing rapidly in the area, and although mining in river systems is briefly mentioned, this is an impact that should be given more attention in the next stage of the EMF as applications have even been received for mining within rivers and river terraces (especially in certain tributaries of the Breede River). We understand that it is difficult to obtain the most up to date mining application data but there is definitely more mining activity than indicated on Map 7-4.</td>
<td>Alana Duffel-Canham, CapeNature</td>
<td>Map 7-4 was based on national land cover information and its main purpose is to show the approximate extent of remaining natural vegetation rather than that of mining. We agree that mining is not adequately represented on this map and the Mines &amp; Quarries category has thus been removed. Mining-related information is shown on Map 5-2, although no dataset could be found showing the actual extent of mining.</td>
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<td>95.</td>
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<td>As mentioned in the report, the risk of flooding in the Winelands District is very high. Determination of setback lines should be mentioned as a priority need for the area in addition to maintaining of river corridors. This could possibly be included as part of Environmental Impact Management Zones?</td>
<td>Alana Duffel-Canham, CapeNature</td>
<td>The absence of determined floodlines has been a challenge in the determination of appropriate setback lines in the study area. Please refer to the EMF Report regarding how this was addressed.</td>
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<td>96.</td>
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<td>From our perspective it is very important that the EMF will address the development of more and more tourist facilities in the riparian zone of the Breede River. We are increasingly nervous about the water quality risks associated with these developments.</td>
<td>Louis Bruwer (Central Breede River WUA)</td>
<td>The EMF Report will identify areas that are more or less suitable for such types of developments.</td>
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<td>97.</td>
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<td>I have noted a seepage/flow of water coming out of the Ashton cemetery,</td>
<td>Michael John</td>
<td>This is a very site specific problem, which is outside the scope of this EMF,</td>
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<td>approx 2 months ago a newly laid westward pipe to Cogmanskloof burst just below the Vodacom Hill reservoir. The burst was repaired and I think storage occurred in the graves and now is flowing out and accumulating in the field between the cemetery and houses. I think it is a health hazard. The cemetery is located in watercourses. Chemicals could be added to sterilise e.g. chlorine after tests.</td>
<td>Jakins, Ashton Resident</td>
<td>although your correspondence has been forwarded to the CWDM for their attention (Mr Randall Humphreys, Environmental Health). The aim of the EMF would be to guide development, to ensure that in future e.g. cemeteries are not situated in or close to water courses.</td>
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<td>98</td>
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<td>Concerning the new pipelines from the Vodacom reservoir: a new pipe was laid to service Zolani. The reservoir is uphill from my sister’s residence. The pipes often burst and flood 16 and 14 Hoog Street. Owners have actively pursued the municipality to stop the flooding. Road grading and banks were built, but houses still flooded. No response is received from the Municipality.</td>
<td>Michael John Jakins, Ashton Resident</td>
<td>This is once again a very site specific problem, which cannot be dealt with as part of this EMF process. Your correspondence has been forwarded to CWDM for their attention (Mr Randall Humphreys, Environmental Health).</td>
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**Prepared by**

[Signature]

Sharon Jones  
Principal Environmental Scientist  

**Reviewed by**

[Signature]

Project Reviewer
Appendices
Appendix A: Written Comments
Comments on the agricultural component of the Cape Winelands Environmental Management Framework

Beatrice Conradie
School of Economics, UCT

• **Agriculture productivity:** In addition to being rich in biodiversity, the Cape Winelands is home to agriculture which is substantially more productive than anywhere else in the rest of the province and country (Conradie et al, 2009a &b). This has implications for employment (and job creation into the future), the demand for land for development as well as water use (since all of the profitable crops are irrigated).

• **Appropriate land use for whom (p1)?:** Conflict between agriculture and the environment may be overstating the current situation, but unless the environmental regulator takes cognisance of the financial drivers shaping agriculture, what could be an amicable relationship leading to a win-win development opportunity could deteriorate to open conflict. From the farmer’s point of view appropriate development is more wine grapes and developing pristine natural environments into farm-based tourism opportunities. The latter creates employment (and a separate income) for women who are often counted as financially vulnerable. Key in avoiding conflict is to be explicit about land for further agricultural and farm-based tourism development. The report is entirely silent about this. From agriculture’s point of view it is more important to say what can be developed than what can’t be developed.

• **We need more clarity on property rights:** For example, South Africa’s move from a water rights system to a system of licensing wiped out 50% of the water rights for irrigation on the Berg without compensating farmers. NEMA is doing the same with arable land through its biodiversity regulations. How is the burden for providing a healthy environment spread across the state, agriculture and other sectors of the economy? Who owns the right to water savings being made on farms through improved irrigation efficiencies, and how much water can be saved this way?

• **Detail on the flashpoints and how they will be handled:** The report pays lip service to the idea of the potential conflict between agriculture and the environment, without providing detail on where the real problems lie. Where is land abundant and water scarce? Where is water abundant and arable land scarce? Where is the rising temperatures quoted from Low et al (2007) likely to wipe out fruit production? Where has BWI and Cape Nature Stewardship secured sufficient conservation already, and where should more be done in order to protect high priority ecosystems? Where is further development likely to be approved, and where are the no go zones? What are the principles for approving development for one landowner and not for his or her neighbour?

• **Appropriate detail / disaggregation:** The report creates the impression that olives are the Western Cape’s hope for the future. At the moment olives too insignificant to appear either in the Abstract of Agricultural Statistics or the Farm Census. More data on current areas planted and recent expansion rates would provide a better informed description of agriculture for the province as a whole. Additionally, disaggregating these trends will reveal the almost insurmountable differences between magisterial districts in the Western Cape. Conradie et al (2009a) argued that magisterial districts are not always homogenous and therefore sometimes too big to be the appropriate unit of policy decision making. While the
reasons for managing at the district-level municipality are obvious in a scarce skills environment, managing the environment at that level runs the risk of responding to a meaningless average which local communities can ill afford.

- **Urban development as a threat to agriculture:** It is a well known fact that urban sprawl threatens agriculture. For example, farmland in Wynberg Magisterial district fell from 12 789ha in 1976 to 4 555ha in 1981. Is there a similar threat in Stellenbosch/Kuilsriver, Paarl/Wellington and Worcester? What is projected urban water demand growth, and at what point will it begin to dry up existing irrigation in the Cape Winelands?

- **Lack of clarity and errors:**
  - Apples, pears and plums are the only major crops relying on insect pollination (p127).
  - What are “temporary crops” (p52)?
  - Which problem animals (p75)? It is more likely to be baboons in the Cape Winelands than anything else, giving the major collapse in sheep and goat numbers according to the farm census.
  - Centre pivots (p108) may be quite visible from the side of the road, but they are an entirely unimportant irrigation technology in the Western Cape.
  - “Volatility in employment” (p113) is an overstatement on farms in the Breede (Conradie, 2007).
  - “Planting more crops with a high water demand (e.g. fruit)” (p63) creates the impression that fruit is a water intensive crop. Compared to lucerne it is not. Also, it is impossible to produce any fruit without irrigation.
  - Fire risk from alien vegetation (p114) is as much a risk to vineyards and orchards as to biodiversity.
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<td>vi</td>
<td>“Implementation of the EMF will be informed by environmental management objectives and guidelines to aid planning in different environments in the Cape Winelands District Municipality.”</td>
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<td>Need to find more suitable, less abrasive alternative to ‘conflict’ – applies throughout document. ‘Competing’ land uses; ‘competition’ between agricultural and conservation priorities...? How about.... “The CWDM lies within the Cape Floristic Region, a global biodiversity hotspot, where natural ecosystems and agriculture co-exist in a difficult but mutually dependent relationship. Agriculture is dependent on a host of ecosystem services such as water provisioning, pollination and flood attenuation. Many of the region’s most threatened natural areas, in turn, are entirely dependent on conservation efforts by private landowners....”</td>
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<td>ToR for CWDM EMF were written from agricultural perspective but apply to the entire municipal area. I think the <strong>urban dimension</strong> and especially <strong>poorly planned urban expansion</strong> as a source of environmental change and degradation also need to be given prominence in the Introduction (cf. reference to ‘rapid urban expansion’ under 7.4, Pressures and Trends.</td>
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<td>The CWDM DMA is a huge area – what is its aerial extent? Its geography is certainly a factor that influences planning and service delivery.</td>
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<td>1.6 Objectives of this report – maybe you can add a paragraph below the bulleted list that summarises the next phase. Creates a sense of purpose and anticipation in the mind of the reader.</td>
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<td>2.2.3 Phase 3: EMF – Make sure that the term ‘Environmental Management Impact Zones’ is used consistently throughout the document. I’d suggest a re-wording to the fourth bulleted item.... “Identification and mapping of Environmental Impact Management Zones which indicate areas with similar environmental attributes and therefore similar management objectives....” (I hope this is so; crucial to logic underpinning the EMF).</td>
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<tr>
<td>15</td>
<td>Bottom right. Suggest a rewording.... “For planning purposes, the vegetation types of the Western Cape can be arranged into six ecosystems with broadly similar ecological characteristics and management requirements, i.e. coastal, lowland fynbos, midland and mountain fynbos, renosterveld, succulent karoo and mainland thicket ecosystems...” The reference that should be used here is the <strong>Fynbos Forum ecosystem guidelines</strong> (De Villiers et al, 2005). The map can be attributed to SANBI BGIS.</td>
</tr>
<tr>
<td>21</td>
<td>Bottom right. ‘Conflict’ can be replaced with ‘incompatibility’</td>
</tr>
<tr>
<td>22</td>
<td>3.4.1 Key strategic planning docs Add <strong>draft Western Cape Rural Land Use Planning and Management Guidelines</strong> (DEADP, 2009) at the end of the bulleted list. They’re important because they seek to give effect to the strategic objectives of the PSDF rural areas, beyond the urban edge. The <strong>PSDF</strong> should be include up-front because it’s the foundation framework plan for the province,</td>
</tr>
</tbody>
</table>
Table 3 - 2. Maybe should be expanded to include reference to the ‘spatial planning categories’ (SPCs) provided for the PSDF and rural land use guidelines, viz. Core 1, Core 2, Buffer 1, Buffer 2, etc.

These guidelines are based on the categories that underpin CBA maps (CBAs, Critical Ecol Support Areas, Other Ecol Support Areas, etc – NB these are being revised and may be reduced to just CBAs, ESAs, Other Natural Vegetation, etc). Whereas CBA maps depict priority areas for biodiversity conservation, the SPCs close the gap between biodiversity conservation and development planning by assigning land-use planning objectives to their biodiversity equivalents.

DEADP expects all SDFs to use this system, and the EMF should follow suit. See attached table that summarises the relationship between CBA maps and SPCs.

I don’t think the EMF must be permitted any discretion w.r.t. the use of SPCs. The CSIR SEA precedes the land use guidelines and the EMF needs to be closely aligned with the latter policy.

In broad, I see the Env Impact Management Zones fitting into each other like this:

1. CBA maps for the respective CWDM municipalities
2. CBA etc management objectives
3. SPCs and their objectives and guidelines for the corresponding CBA, ESA, ONV etc.

Where possible, Environmental Impact Management Zones must be defined by an area’s CBA status (which provides the strategic planning context) and the type of affected ecosystem defined either by the Fynbos forum guidelines, or the FSP freshwater guidelines w.r.t. river channel types and wetland types (which sets management objectives, and introduces the relevant land-use etc guideline).

LandCare area-wide planning has an established presence in the Upper Breede River Valley and should be included among the planning instruments. It is not sanctioned by any law, but it arguably represents one of the most successful and enduring examples of sector-specific spatial planning in support of co-operative resource governance in the W Cape.

5.1.1 Mineral deposits. Mining of alluvial deposits by quarrying companies etc in foothill rivers in the CWDM is apparently a growing problem -- Elkerine Rossouw at BOCMA will have more on this (023) 347 8127

The Klein Roggeveld Mountains (~1 200 msl) should be added as they define the eastern extremity of the Ceres (Tankwa) Karoo and the DMA where it borders the Northern Cape.

5.3 Soils. I’ve asked Elsenburg to provide common examples of the corresponding agricultural classifications (Glenrosa, Mispah, Hutton, etc) for the respective structural definitions of different soils (p 35). This will help to tie the EMF into agricultural land management (one person’s habitat is another’s terroir...).

6.1.2 Rivers. Strongly recommend that FSP classification of river channel types (cf. Job et al., 2008) be used as basis for setting management objectives and providing associated land use guidelines. See the river management guideline at the back of the FSP rivers’ doc. Like wetlands (Table 6-2, p 47) rivers should be classified in terms of the different channel types; mountain, upper and lower foothill and lowland rivers.

The FSP guidelines sets management objectives for each (water quantity, quality, env flow requirements, erosion and sedimentation, connectivity and riparian habitat; Liz Day has also informally come up with objectives for maintaining floodplain processes). This is a fantastic product, and approach, for guiding EA and land-use, especially when supported by the management objectives.
for aquatic CBAs and ESAs. See attached example of how objectives-led river management was used as a screening matrix to select best option for soil cons works in foothills rivers in Breede WMA (De Villiers and Day, 2011). Have also used it to screen

I think this approach can be used fruitfully in the next phase of the EMF project, but its foundation must be laid in the status quo report.

43 Ecological importance of catchments and rivers. Maybe something should be added about the socio-economic value of the CWDM’s rivers.

I’m a bit concerned that we’re caught up in the logic of a zero-sum game, humans pitted against nature, and ruining it (true, but no what we want). The EMF should possibly be seeking to break with our established forms of commonsensical thinking and instead recast biodiversity in the language of the Millennium Ecosystem Assessment: human wellbeing is linked to the state of ecosystem services and, hence, the state of biodiversity (cf. Scholes RJ and Biggs R (eds)(2004) Ecosystem Services in Southern Africa: A Regional Assessment – the regional-scale component of the Millennium Ecosystem Assessment . CSIR, Pretorial)

62 6.4 Pressures and trends. Extra woes w.r.t. river management (courtesy WC Dept Agric)....

Degradation of the riparian environment is variously attributed to:

- Encroachment of farmland, chiefly vineyards, into the riparian zone;
- Establishment of farm roads between vineyards and river banks;
- Massive, flood-related erosion to particularly river banks and abutting floodplains;
- A build-up of alluvium to a point almost level with the base of the vineyards;
- Bulldozing of levees in channels to deflect floodwaters from vineyards;
- Transverse bulldozing of the banks to widen rivers, thereby accelerating flood run-off;
- Use of packed rocks to protect exposed banks against scour and erosion;
- Invasive by woody alien plants and pioneer grasses and weeds; and
- Inappropriately located or designed structures in the channel, including weirs, drifts and bridges.

These drivers of habitat loss and degradation may function synergistically, as exemplified by the constriction-erosion-deposition-infestation-constriction etc cycle

67 The organisation of veg types into ‘ecosystems’ is a device that originated in the Fynbos Forum guidelines and I’m not aware of it having been used anywhere else except in the grasslands biome, where it the same’s being done for grassland veg types.

One of the main purposes of this artificial simplification of great veg diversity is to make life easier for planners and managers; it’s not a scientific product, but a pragmatic, management-driven one.

I think the connection should be made round about here, or even earlier, between the different types of ecosystems and the management objectives and guidelines that wil I be developed later. This is the approach adopted by the Fynbos Forum guidelines: each ‘ecosystem’ is interpreted on the basis of eight standard question relating to ecological functioning, key issues for development planning, and conservation and restoration. Precisely the same approach can be followed in the EMF.

82 7.4 Pressures and trends. Wetland modification, etc -- “Alluvial ecosystems are degraded by changes to sub-surface hydological functioning as a result of drainage in support of cultivation…”

118 10.3 Flood risk. Gravel roads in the DMA are particularly vulnerable to flood damage as evidenced in 2008 and 2009 (WC Dept of Transport and Public Works).
11.3 Ecosystem services. In line with other comment re Millennium Ecosystem Assessment etc, I think it would strengthen the document, and particularly its enlightened approach to managing human-ecosystem interactions by moving the whole of 11.3 to Ch 7. I’d suggest that it be inserted as 7.4, i.e. before ‘pressures and trends’.
SRK Consulting (Engineers and Scientists)
Private Bag X 18
Rondebosch
7701

Att: Sharon Jones

Dear Ms. Jones

ENVIRONMENTAL MANAGEMENT FRAMEWORK (EMF) FOR THE CAPE WINELANDS DISTRICT MUNICIPALITY: DRAFT STATUS QUO REPORT FOR PSC COMMENT

Your request for comment on the abovementioned document dated 7 March 2011, refers.

After scrutinizing the document the Breede-Overberg Catchment Management Agency would like to comment as follows:

- The input of Ms. Antonia Belcher, Aquatic Scientist, Tel: (021)851 5031, Cell: 082 883 8055 Email: tani.b@iburst.co.za should be considered as she wrote the State of the Rivers Report for DWA on the Breede River during 2010. The document has not been published, and the information could therefore not be cross referenced with the EMF for comment.

- The input of Ms. Melissa Linthaar-Strauss, Water Quality Officer, DWA should be requested for the rivers that fall without the boundaries of the BOCMA area.

- Page 43 – the second last paragraph needs to be restructured as it is not clear.

- Page 51and 59 – Ground water resources – Maybe the General Authorisation, Groundwater Taking Zones (DWA) should be mentioned here whereby a limitation is
placed on the volume of extraction per hectare from certain areas within the study area.

Page 51 – *Aquifer vulnerability: Langeberg Municipality? Should this not rather read Langeberg Municipal area?*

Page 52 – Other agriculture users such as poultry farms and piggeries are increasing and plays a major role on water abstraction and that of possible pollution of water resources.

Page 53 – Storage of run-off in dams for town uses also has a large impact on the water availability within the river.

Page 63 – Infestation of water courses by alien species, both plants *and animals,* ..
  - Neglect of wetlands in the Western Cape (and elsewhere in South Africa), *in spite*
  - Table 6-10 last bullet – grazing *in and around wetlands*
  - Climate change is predicted to result

Page 101 – The water transporting infrastructure (pipes / pump stations) may be sufficient but most of it is old and will need to be replaced soon to keep it from deteriorating even further.

Page 110 – many farmers also includes piggeries and poultry to their farming activities – these places as much strain on water resources and presents great pollution possibilities

Page 112 – there are a couple of sand mining applications along the main tributaries to the Breede river. A lot of illegal sand mining is taking place as well for some time now.

Page 118 – Touwsriver was totally shut off from civilisation for a long time during 2008 floods when an upstream dam broke its walls and flooded the Donkies river which cuts through Touwsriver. The Touwsriver was also in flood at the same time. The flood broke / displaced a large portion of the main drinking water pipeline providing Touwsriver with water from the Bokriver water treatment works. The town was without drinking water for a couple of weeks and received water via tankers from De Doorns.

I did not see the mentioning of the current use (volume) used by the farming community for drinking water (households) or the negative impacts that the various uses may have on resources. These should form key elements when looking at creating an EMF that is usable by all sectors.

Please feel free to contact the referenced official with any enquiries.

Kind regards

J. VAN STADEN

ACTING CHIEF EXECUTIVE OFFICER
SRK (Sharon),

Please include me as representative of the Western Cape Bee Industry Association (WCBA) as stakeholder.

Honeybees are crucial to Agriculture and Biodiversity (pollination) and need plants (including aliens) in the whole environment to survive. Catch 22 most of the time, but balancing the two can be done through properly taking note and compensating for it through planning and strategizing.

Planting bee friendly trees (including some very useful aliens) where they cannot harm the environment is a must. This will also address the carbon footprint issue.

Regards

Dawid.

**************************************************************************
JD Smit, De Heuwel
Box 5, Klaasvoogds, 6707
dawid@deheuwel.co.za
Tel & Fax (023) 626 1528
Mobile 083 655 2280
**************************************************************************
Almal,
Ek neem kennis hiervan. Ek meen die sagtevrugtebedryf is die party wat behoort te registreer en ek sal my mening met die senior bestuur daarvan bespreek. U sal die nodige terugvoer kry.
Groete,
CK

----- Original Message ----- 

From: Jones, Sharon
To: C Krone
Cc: Dappies Smit; Carl Opperman; Anton Rabe; Christiaan Krone
Sent: Monday, June 06, 2011 3:48 PM

Geagte Mnr Krone

Baie dankie vir u belangstelling in hierdie projek.

U sou dalk opgelet het in die dokumente wat ons onlangs na u gestuur het dat u op die projek se databasis geregistreer is as die voorsitter van die Agri Witzenberg Ceres DLV. Ons sou dus ook gevra het dat u die dokumente beskikbaar stel aan die lede van die DLV. Daarna het verteenwoordigers van Agri-Weskaap egter aan ons bevestig dat u nie meer die DLV verteenwoordig nie en wil graag om verskoning vra vir enige misverstand of ongerief.

Indien u nou wil registreer as ’n private belanghebbende, of in u hoedenigheid as verteenwoordiger van die sagtevrugte industrie, laat ons asseblief so gou moontlik weet.

Die proses om die Omgewingsbestuursraamwerk (OBR) vir die oostelike gedeelte van die Kaapse Wynland Distriksmunisipaliteit op te stel word ingevolge die OBR Regulasies wat in 2010 gepubliseer is onderneem, asook ’n breedvoerige opdrag vir die studie wat aan die Departement van Omgewingsake en Ontwikkelingsbeplanning voorgelê is. Die publieke deelnameproses en verwante tydsverlopes vir kommentaar en kennisgewing van vergaderings sal dus aan die vereistes ingevolge hierdie dokumente voldoen.

Daar word nie vergaderings op hierdie stadium van die proses beoog nie, maar vergaderings of besprekingsessies sal gehou word met sleutelbelanghebbendes wanneer die OBR beskikbaar is vir kommentaar. Intussen, stuur asseblief enige kommentaar wat u op die konsep Status Quo-verslag het voor of op 1 Augustus 2011.

Vriendelike groete
Sharon

From: C Krone [mailto:ckrone@telkomsa.net]
Sent: 05 June 2011 17:40
To: Jones, Sharon
Cc: Dappies Smit; Carl Opperman; Anton Rabe; Christiaan Krone
Subject: Emailing: Letter_Release of status quo for public review_summary_Afr.pdf

Goeie dag,
Ek meen dat ons hier te doen het met ’n intensiewe vrugtestreek wat sensitiewe areas insluit en dat ons wel ons insette sal moet maak. Ek is bereid om myself beskikbaar te maak, maar versoek dat ruim 2 maande kennis gegee moet word van vergaderings asook dat indien moontlik ek vooraf geken sal word insake datum bepalings. So nie is my uitgangspunt dat nie prakties met landbou geskakel is om inklusiwiteit binne prosesse te verseker nie. Ek hoor graag van u.
Groete,
Chris Krone,
023 230 2973 (telefax)
082 629 0050
Posbus 51, Tulbagh 6820.
ckrone@telkomsa.net

The message is ready to be sent with the following file or link attachments:
Letter_Release of status quo for public review_summary_Afr.pdf

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.
Dear Sharon Jones

Regarding your EMF report on our area, we kindly ask that you please note the following in your EMF report, as it is a recurring issue with the Langeberg Municipality:

Financial: The Tourist Trade would be adversely affected

1. The R317 is the main wine tourist route in the area attracting both local and foreign tourists to Robertson and the Breedevalley.
2. The Constitution Road Wine Growers farm near the start of the R317 is one of the most successful BEE agricultural projects to date and attracts widespread interest from dignitaries and the media.
3. The R317 leads to some of the top thoroughbred racehorse breeding studs in South Africa attracting both local and international buyers to the area.
4. The Robertson Riding School that caters to locals and tourists alike is also located near the entrance to the R317.
5. The R317 also leads to several guest houses in the area.

Safety:

1. The proposed area is opposite an ever-growing township development, Nquebela, and the temptation for children and shack dwellers to cross the busy road to scavenge the dump could lead to increased fatalities.
2. Inevitably a rubbish dump, no matter how well managed, will lead to an increase in plastic bags blowing over the area. Horses are inquisitive and eating a plastic bag could be fatal to these magnificent animals.

Economic Proposal:

The Municipality erects attractive and properly maintained arts & craft stalls for weekend hire, with ample parking, in front of the "hop huisies" (government sponsored housing) at the start of the R317.

This will not only assist Nquebela residents in directly benefiting from the tourist trade, but add tourist appeal and capitalise on this major tourist route.

With Robertson having overtaken Franshoek as the 2nd most popular tourist destination in South Africa last year, the time is ripe to exploit the advantage.

Kind regards
Duncan Barry
Chairman of the BAR Valley Breeders
Dear Ms. Jones


CapeNature would like to thank you for the opportunity to comment on the Status Quo Report for the Cape Winelands District Municipality EMF and wish to make the following comments:

1. Overall, the report provides a comprehensive overview of the environment in the Witzenberg, Langeberg, DMA and Breede Valley Municipalities. We are pleased to note that the report has made extensive use of existing conservation planning products, especially the Biodiversity Sector Plans which include Critical Biodiversity Area (CBA) maps and the National Freshwater Ecosystem Priority Areas (NF EPA). It appears that map 7-5 represents CBAs as combined terrestrial and freshwater CBAs and we would like to suggest that perhaps these should be represented as separate maps.

2. We are also pleased to note that due consideration has been given to climate change and protection of ecological corridors, particularly rivers.

3. Mining activities are increasing rapidly in the area, and although mining in river systems is briefly mentioned, this is an impact that should be given more attention in the next stage of the EMF as applications have even been received for mining within rivers and river terraces (especially in certain tributaries of the Breede River). We understand that it is difficult to obtain the most up to date mining application data but there is definitely more mining activity than indicated on Map 7-4.

4. As mentioned in the report, the risk of flooding in the Winelands District is very high. Determination of setback lines should be mentioned as a priority need for the area in
addition to maintaining of river corridors. This could possibly be included as part of Environmental Impact Management Zones?

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

Yours sincerely

Alana Duffell-Canham
For: Manager (Scientific Services)
Sharon,

Your e-mail of 27 May 2011 refers.

I scanned through the relevant sections of the Status Quo Report, and wish to comment as follows:

a. Central Breede River WUA should be listed as an I&AP for the purposes of the EMF process. As you most probably know, CBRWUA is the biggest WUA in the Breede WMA, and manages water supply to some 24 500 ha of irrigated agriculture in the Middle Breede.

b. Page 46 Table 6-3
The yield of Greater Brandvlei is shown to be 155 million m³/a. At what assurance? In fact the total present allocation to irrigated agriculture from the Greater Brandvlei GWS amounts to some 214 million m³/a, at an assurance of supply of 91%.

c. Page 54 Sect 6.3.1 Surface water abstraction
The information by BOCMA that no further allocations can be made is incorrect. Detailed analysis that has been done by Aurecon for CBRWUA has shown that a further 33 million m³/a can be allocated from Greater Brandvlei. In fact a license application has been submitted for this water.

d. From our perspective it is very important that the EMF will address the development of more and more tourist facilities in the riparian zone of the Breede River. We are increasingly nervous about the water quality risks associated with these developments.

Regards,
Louis Bruwer
CEO: Central Breede River WUA
ENVIRONMENTAL MANAGEMENT FRAMEWORK
CAPE WINELANDS DISTRICT MUNICIPALITY
DRAFT STATUS QUO REPORT
NOTICE NO: 410438-01/2011

1st August 2011
SRK consulting
Postnet Suite #206
Private Bag X18
Rondebosch
7701

Attention: Sue Reuther / Sharon Jones

As Chairman and representing the Cape Heritage and Development Forum (CHDF) I hereby offer comment on the Winelands EMF status quo draft.

As we are all aware the Cape Winelands is world renowned and holds something very special. The EMF must encompass protection of eco-sensitive areas which would include flaura, fauna and urban edges which need special attention. There is a need for development within the study areas but this must be accomplished by taking all factors into consideration especially when development threatens to encroach outside the urban edge and into environmentally protected and sensitive areas.

The comments as follows:

Pg 3

"The Drakenstein and Stellenbosch Municipalities are excluded from the study area"?
The CHDF takes heed of the reasons but feels that these areas should be incorporated into one study area and should not be dealt with in isolation under a different “EMF” umbrella. There should be total cohesion.

Pg 6

“...once the an EMF has been adopted it must be implemented and monitored on a regular basis”

The CHDF would like to know how this will be monitored and what set of criteria will be implemented to check that in fact the EMF is working. This is critical as to its success. If no checks and balances are implemented the EMF will be doomed to failure.

Pg 7 – point 2.1

“Sensitive environments may coincide with areas of high potential for development...”

This could be a potential red light. From past experience all types of reasoning's within EIA reports are used to justify development into sensitive areas. The land is fallow and of low agricultural yield etc.

The GIS platform?

The concept of an electronic map is a good idea. The CHDF would like to understand based on this “overlay” what will be the set of criteria that will determine definite no go areas? This will be critical to determining if development should go ahead in these sensitive areas.

Pg 9

GIS tool to be available free via a GIS viewer package.

Is this only available to municipalities and officials. If yes then the CHDF objects. It should be available to all communities especially to communities that have a keen interest in there specific areas.

“...vast areas remain unsurveyed, areas which have been surveyed show a rich archaeological potential....”

CHDF states that the unsurveyed areas should receive a priority to have them studied for this potential. If not then these areas stand a chance of being developed without due process and thus we lose another important part of our heritage.

2.4.2

“...the EMF will not report in detail on areas within towns and settlements in the CWDM”

Why are certain areas excluded but included under a separate umbrella? Within these areas exist the same issues as areas included in the study. Once again, all areas need to be encompassed within the EMF study. The CHDF feels that you cannot have different sets of rules and regulations for the same type of issues based in different zones.
"There is limited information available pertaining cultural heritage in the study area."

The CHDF is very concerned with this limited information. It is also alarming to note that there has been no systematic archaeological surveys done within the CWDM. It is also alarming to note that very few archaeological Impact Assessments (AIA) have been done. This needs to be undertaken without fail and incorporated within the EMF. Without these studies the EMF remains incomplete and it also leaves these potential areas to be developed without any guidelines which could lead to a possible desecration of heritage areas.

"Eleven main crops, largely fruit and grapes, are grown on 89% of the total agricultural land area....of which only 19% is high potential arable land (CWDM 2010)"

If 89% is currently being used to grow crops as mentioned but only 19% has high potential is the CHDF led to believe that the remaining 70% is viewed as potential land to be developed? If this is the case then the CHDF is vehemently opposed to this. South Africa has less than 3% agricultural land left so if land is deemed to be of a low grade it is of no consequence. If crops can grow in low grade soil then so be it. Agriculture is agriculture. Food security is fundamental

"Urban Restructuring Objectives – End the apartheid structure of urban settlements"

The CHDF finds this statement very vague. This is a study all on its own. Can more clarity be provided regarding this statement and how this will be accomplished?

"Cease urban development outside of urban edges"

This is a very important statement but it is another thing maintaining it. Over the past few years certain politicians and officials have been hell bent on moving urban edges for whatever reason. Urban edges are there for a reason especially edges that protect sensitive, heritage and agriculture areas. One of the current administrations objectives is MAJOR developments. This EMF needs to protect areas that need protecting at all costs and this EMF should not just be a framework of words without positive action. The enforcement of the EMF is the critical factor.

"A portion of the Breede Valley and Witzenberg Municipalities fall within the boundaries of the CWBR although the majority of the reserve lies outside the study area"

Once again the CHDF state that this does not make sense. As stated in point 2.4.2 above all areas need to be encompassed within the EMF study. The CHDF feels that you cannot have different sets of rules and regulations for the same type of issues in different zones.
“Buffer Area – Most of the private land constituting the buffer area is zoned for agricultural purposes”

Good, let’s keep it like that.

“The CWBR should not be seen as isolated from its surroundings but as an integral part of the regional planning and development strategy aimed at promoting sustainable development”

This is a MAJOR RED LIGHT for the CHDF. The CWBR was registered at UNESCO on the 18th September 2007 and thus listed on the World network of Biosphere Reserves. In the CHDF mind this area is protected so how could even the mention of sustainable development even be proposed? (stand under correction) Is the CWBR outside the urban edge? Clarity is please required.

Pg 23 – point 3.4.1

Cape Winelands District Integrated Plan (IDP)
Cape Winelands District Spatial Development Framework (SDF)
Strategic Environmental Assessment (SEA)

“Each of these is considered to be a “living” document, to be reviewed regularly to include new information, and a key component of an integrated set of strategic documents”

The CHDF hopes that the statement “living document” does not mean that the EMF can be used as a tool to desecrate urban edges inclusive of agricultural and eco sensitive areas.

Pg 24

“Integration – That spatial planning, land use management and land development be aligned and combined into a unified entity”

This can only work if all areas are encompassed into the study area. As per this document certain demographics are not included but will be dealt under a different umbrella. Based on this factor the EMF will be incomplete.

Pg 25

“The EMF will not represent an environmental policy and action plan but will aid in facilitating a consistent approach to the consideration of environmental issues in the review of IDP’s and SDF’s which are to take the EMF into consideration”

The CHDF feels that this is such a contradiction in terms. EMF = ENVIRONMENTAL MANAGEMENT FRAMEWORK. So the questions bears, the policy that should represent exactly what it stands for does not have representation and environmental policy so the CHDF can only but conclude that this EMF is geared towards development and all “other” policies caught in the peripherals as stand alones and not encompassed within this EMF. Dangerous and leaves the door open for interpretation which can lead to developments in agricultural and eco sensitive areas. An action plan is a natural part of this framework. How can one put together an environmental framework without an action plan?
The CHDF feels that there should be an overarching environmental framework which will include the action plan. The EMF should be a one stop shop. Keep it simple. Encompass all stand alone policies applicable under the umbrella of this EMF. It should be viewed as a complete package (one stop shop) as it were. This should be considered. Too many peripherals and reliance’s of “other” pertinent policies can lead to confusion and it is very labour intensive.

 Pg 36 – point 5.3.1 – Soil Types

"Soil types are important as they provide a supply of water, anchorage in the ground and a source of nutrition, which, together with climate, determines the vegetation types that can be supported”

As commented under pg 15 even low grade agriculture land should not be desecrated at a whim to allow development. We only have less than 3% agricultural land left. Developers and officials are quick to use the excuse of “low yield” soils. Once again agricultural is agriculture. If soil can support a crop KEEP IT!

 Pg 38 – point 5.3.2 – Land Degradation

"South Africa’s soils are generally very vulnerable to land degradation and have low resilience (recovery potential)”

Does the CHDF take this to mean that South Africa is so unique compared to the rest of the world. The CHDF hopes that this is not a pre-cursor for an excuse to utilize agricultural land for development. Soil can be rehabilitated. Agriculture is agriculture.

 Pg 48 – point 6.1.3

"Wetlands are intrinsically valuable ecosystems that provide many important services to the environment and society”

Wetlands must be protected at all times. If developments are to be allowed after a full comprehensive EIA process then it should only be allowed if it takes place between 100-200m from the wetland, no exceptions. Wetlands are very vulnerable from sewerage and storm water seepage. This will have adverse affects on protected and especially red data species endemic to that particular area.

 Pg 52 –point 6.2

"...The CWDM overlies the largest groundwater resource in the Western Cape, the Table Mountain Group Aquifer which originates in this area, as most of the recharge to this system occurs in the mountains of the CWDM. The study area is almost entirely underlain by fractured aquifers with varying yields”

The CHDF states that nothing should interfere with these aquifers. Water is life and South Africa is running out of this life sustaining resource. With any proposed development this factor needs to be taken into consideration. Aquifers cannot be rehabilitated like surface water so once contaminated this resource could be lost forever.
"The surface water in the study area is critical economic resource that is in increasingly short supply. A water balance provides an indication of the available after yield of a system versus the current water requirements"

For any future developments within designated areas which are permissible the availability of water resources should seriously be considered. Don’t just build and face the consequences afterward. This is critical!

"Activities impacting on wetlands in the study areas"

Any wetland that stands to be drained for agriculture should go through the full EIA process. But this should not just be an automatic process. If there are red data species endemic to that area this should automatically become a no-go zone. No exceptions. Wetlands are eco-systems and usually have impacts further downstream. Cut off a source at a point and the wetland eco-system could die as a complete system.

"...From an ecological perspective the CWDM is an extraordinary diverse area located on the transition between two of South Africa’s nine biomes (or major economical regions), namely the Fynbos and the succulent Karoo biomes...."

**Point 7.1**

**Witzenberg municipality** - 12 endemic vegetation types  
**Breede Valley municipality** – 21 endemic vegetation types  
**Langeberg municipality** – 13 endemic vegetation types

The above stats speak for themselves. The endemic species to be protected at all costs. The CHDF requests that a register be drawn up of the endemic species and gazetted for protection.

**Threatened Vegetation – Table 7-3**

- Fynbos – Breede Alluvium – *protected at all costs*  
- Fynbos – Romansrivier Proteoid Renosterveld – *protected at all costs*  
- Fynbos – Hex River Arid Alluvium – *protected at all costs*  
- Fynbos – Breede Arid Alluvium – *protected at all costs*  
- Fynbos - Tulbagh Alluvium – *protected at all costs*  
- Fynbos – Elgin Shale – *protected at all costs*  
- Fynbos – Swartland Alluvium – *protected at all costs*  
- Renosterveld – Central Ruens Shale – *protected at all costs*  
- Renosterveld – Eastern Ruens Shale – *protected at all costs*  
- Renosterveld – Swartland Shale – *protected at all costs*
Protected areas

Priority Areas – Point 7.3.1 – Critical Biodiversity Areas

Critical biodiversity areas and ecological support areas
Other natural remaining and no natural remaining areas
Urban areas

These should all be encompassed under the umbrella of the EMF and should enjoy the status of thorough investigation.

"...Although mountain catchments areas are formally protected, no regulations have been promulgated (e.g. to stipulate management obligations) and a distinction is therefore made between these areas and other protected areas that provide long term security of tenure in terms of biodiversity conservation”

The CHDF states once again that this is such a contradiction in terms. How can areas be protected without regulations? Protection and regulations go hand in hand. If catchments areas are protected on what basis are they protected if there are no regulations?
"Other (non-declared) conservation area include numerous private nature reserves... as well as a number of conservancies (not mapped) which entail cooperative landowner agreements with no legal obligations. These informally protected areas (excluding non-declared conservation areas) that occur within the study area"

The CHDF states that all private reserves must be regulated if they have any flora / fauna which are protected under the law. NO EXCEPTIONS. If this is not implemented farmers and land owners can decimate protected species at will without recourse. This will be highly undesirable and unacceptable.

Pg 83 – Threatened Fauna Habitat

*Indigenous fish species, Geometric Tortoise (P. geometrics) and the Ravine rabbit (B. monticularis)... are critically endangered..”*

The CHDF states that private landowners should be regulated when it comes to the protection of endangered species. NO EXCEPTIONS!

Pg 84 – Point 8.1 Cultural Heritage Resources

The CHDF states that Heritage Western Cape (HWC) and SAHRA become involved in identifying special areas within the study areas pertaining to heritage areas such as buildings / structures, caves and natural landscapes etc. An overarching HWC / SAHRA policy to protect special areas within this arena and needs to be encompassed within the EMF. (Pages 85 & 86 have an interesting rendition of times past which form part of our history and heritage)

Pg 86 – point 8.2; 8.3 – Paleontology & Archaeology

*"Paleontology - ... particularly at risk of illegal collection of fossil material”*

What protection is provided to save this desecration? The CHDF must but accept that there is none. HWC and SAHRA to get involved.

*"Archaeology – No systematic...surveys have taken place in the study area....”*

As per the report there is a high archaeological potential regarding the study. The CHDF asks the questions as to what is being done to create a register of all sites concerned. Without this the EMF is incomplete and invalid. It also leaves these areas wide open for desecration.

Pg 88 – Cultural Landscapes

"In South Africa the human presence in the landscape is of great antiquity extending back more than a million years. Embedded in the cultural landscape are the (end) products of human social interaction (cultural activities) e.g. rock art; stone tools; roads; historical houses etc. The definition of cultural landscape (Hart et al, 2010) also includes "wilderness landscapes"
The CHDF states that these landscapes should be encompassed under the EMF and not under stand alone policies. This is critical.

Pg 92 – POINT 8.5 – Built environment

"Although the EMF will not focus on areas inside the urban edge it is necessary to identify those towns with high heritage potential"

Another baffling statement. WHY? Refer to point 2.4.2 Pg 9. HWC and SAHRA need to be fully involved (Pg 92 – 96)

Pg 93 – Point 8.6 – Scenic Routes and Passes

"No scenic routes have been officially declared in the Western Cape to date...."

The City has a scenic route policy. This should be encompassed within the EMF.

Pg 106 – Solid waste disposal

"Breede Valley Municipality: De Doorns (unlicensed)"

The City is in breach of its own policies. The CHDF states that it must put its house in order.

Pg 109

"Despite the economic importance of agriculture, only some 5% of the land is under cultivation with much of the rest currently not being suitable to various constraints"

As stated before the CHDF states that it hopes this is not a precursor for unsustainable development? The CHDF encourages the expansion of agricultural land.

Pg 113 – point 9.2.3 – Mining

Should be checked and illegal mining clamped down on.

Pg 124 – point 11.1.3 – Role of Water Resources

"Without water there is no life"

Statement speaks for itself. To be protected at all costs.

The CHDF sincerely hopes that the comments made in this document will be afforded the appropriate attention in order that the Community’s future interactions with the City are positive and constructive, ultimately doing what is right for Cape Town’s future generations of citizens

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16 HOOG ST  
ASHTON  
6715  
31/8/11  

Dear Sharon  

Re: HYDROLOGY IN WARD 8, ASHTON + BUILT ENVIRONMENT  

1. THIS LETTER CONFIRMS MY TELEPHONE CONVERSATIONS WITH YOU.  
I HAVE NOTED A SURFACE FLOW OF WATER COMING OUT OF THE ASHTON CEMETARY 12 MONTHS AGO, A NEWLY Laid WESTWARD PIPE TO COMMANDO BURST JUST BELOW THE VODACOM HILL RESERVOIR, THE BURST WAS REPAIRED AND I THINK STORAGE OCCURED IN THE GRAVES & NOW IS FLOWING OUT - RECLAIMING IN THE FIELD BETWEEN CEMETARY + HOUSES  
I THINK IT IS A HEALTH HAZARD, DECOMPOSING BODIES NOT ALWAYS OF PESTE DISEASE, THE CEMETARY IS LOCATED IN A WATERSOURCE. CHEMICALS COULD BE ADDO TO STRENGTHEN OR CHLORINE AFTER TESTS.  

2. CONCERNING THE NEW PIPELINES FROM THE VODACOM RESERVOIR:  
NEW PIPE WAS Laid TO SERVICE ZOONI. THE RESERVOIR IS UPHILL FROM MY SISTERS RESIDENCE. THE PIPES OFTEN BURST + FLOODED. 16 HOOG ST, MY NEIGHBOUR MR VC (L H) DE RUITER, 14 HOOG ST, TEL 023-615-1323 ALSO EXPERIENCES A MAJOR FLOODING OR BUILDINGS. HE HAS ACTIVELY PURSUED MUNICIPALITY TO STOP THE FLOODING OF THE HOUSES. ROAD GRADING + DANKS WERE BUILT. AFTER THE CONSTRUCTION, HOUSE STILL FLOODED, CONTACT PERSON IS MR JOHNSON AT ASHTON MUNICIPALITY. HE DONT RETURN CALLS!  
I WOULD LIKE WORK CONTRACT FOR SRK IN THE 1980S (14 SALARIES IN 1 YEAR) 1982) GROUNDWATER CIVILS. I KNOW WHAT SRK HAD ACHIEVED LOCALLY + ABROAD TO LIVE UP TO THE NAME CIVIL.  

BEST OF FORTUNE TO YOU.  
Yours sincerely  

MICHAEL JOHN JAKINS  
TEL 082-084-4065