



NICK HELME BOTANICAL SURVEYS

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Pri.Sci.Nat # 400045/08

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Lornay Environmental

ATT: Michelle Naylor

Dear Michelle

Comment on changes made to proposed layout: Rust Gate development, Helderstroom, W Cape.

Various layout changes were made to the proposed development layout, subsequent to my botanical assessment (dated 23 Feb 2024), in order to try and accommodate concerns raised by various parties, notably CapeNature. My responses to the changes are outlined below.

- Site 26 & Site 27
 - These sites were moved from Farm 824 to sites 24 and 25 respectively on Farm 826

Response: This change, whilst avoiding some of the impacts of having two outlying pods (fire regime alteration; invasive alien Argentine ants spreading into adjacent Fynbos; facilitated invasion of alien plants) – does mean that one will now have double the impact in the new footprint area, and specifically on the population of *Leucadendron tinctorum* (previously Near Threatened, but now Least Concern), which grows here. However, this population is not deemed regionally important, as the species is common and widespread over a large range.

Net botanical impact on entire project: no change

- Site 27 (*previously site 30 on site plan Rev4*)
 - Site 27, together with additional unit from site 28, are combined into a cluster, and is now shown as site 27 on site plan Rev5
 - This site was noted as Site 30 in my Feb 2024 report.
 - No more sites on Farm 887

Net botanical impact on entire project: This change also removes the outlying site impacts, but doubles up the Site 30 impacts, and no Species of Conservation Concern should be impact. No change to net botanical impacts.

- Site 5
 - This site was notated as site 3B in my Feb 2024 report.

Net botanical impact on entire project: No change to net botanical impacts.

Conclusion:

On balance there will be minor positive but probably not significant changes to the likely botanical impacts. Removal of the outlying sites will simplify fire management and mean that fire frequency is less likely to be disrupted in these outlying areas, which is a slight positive, as is the reduced risk of alien plant invasion (due to soil disturbance) and alien Argentine ant invasion – both of which are thus slightly positive. The overall botanical impact is still Low – Medium negative after mitigation, as before. This is still an acceptable level of impact.

Yours sincerely



Nick Helme