



NICK HELME BOTANICAL SURVEYS

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Pri.Sci.Nat # 400045/08

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Lornay Environmental
Hermanus
ATT: Michelle Naylor

Dear Michelle

Additional Specialist Botanical Input: Romansbaai Abalone IA

This addendum serves to update my Botanical Impact Assessment for this project proposal, which was dated 28 Nov 2024, and subsequent Addenda, including the most recent one of 25 July 2025. The final paragraph of that Addendum is as below:

“This level of post mitigation botanical impact does potentially trigger a biodiversity offset requirement (Department of Forestry, Fisheries & the Environment. 2023), notably for the Phase 2 grow out area (Low to Medium negative impact) and the dam area (Medium negative impact) – a total footprint area of about 1.5ha (for Alternative 4). However, given that the vegetation type is relatively well conserved (100% of national target already set aside) – at least on paper – no further land additions to the conservation of Overberg Dune Strandveld are advised, especially given CapeNature’s management constraints. Given that even the formally conserved areas of this vegetation type are under severe threat from alien invasive vegetation, such as in the nearby Walker Bay Nature Reserve (CapeNature). Thus it is suggested that any biodiversity offset be in the form of funding for alien invasive plant management in these already declared but poorly managed conservation areas. A biodiversity offset specialist should calculate the appropriate quantum of the contribution, and this should ideally be enough to fund alien clearing operations in at least a 15ha area (Alt 4) in perpetuity (based on approx. 1.5ha footprint of Medium and High significance, at an offset ratio of 10:1 for Endangered habitats, as per offset guidelines, Department of Forestry, Fisheries & the Environment 2023).”

Given the apparent intractability of the offset scenarios for this project, the reduced dam footprint (now 0.8ha), and the fact that Overberg Dune Strandveld is well conserved (target of 36% of original extent fully conserved) I have revisited my assessment of the botanical impact of the 0.8ha proposed dam footprint, and of the overall development impact, and have lowered the assessment of overall residual impact from Medium to **Low - Medium**.

This means that no Biodiversity Offset is triggered, and that instead a Strategic Offset be followed in order to help mitigate this residual botanical impact, as previously proposed. The letter from Sean Privett of the Grootbos Foundation, dated 18 March 2026, outlines the mechanism whereby this strategic offset could be implemented. 8ha (10 times the dam footprint area) of Endangered Sand Fynbos habitat on Brown Dog Farm will be cleared of invasive alien vegetation using the funding generated by this strategic offset (some R256 000), and the work will be administered and overseen by The Grootbos Foundation. This piece of land is part of a key ecological corridor in the area and support numerous plant Species of Conservation Concern.

I support the latest mitigation scenario and plan for this project and recommend that it be adopted.

Yours sincerely



Nick Helme