

08/09/2026

MOTIVATION IN SUPPORT OF THE APPOINTED SPECIALIST WETLAND ASSESSMENTS - PROPOSED RESIDENTIAL DEVELOPMENT ON ERF 1486, VERMONT, WESTERN CAPE.

During the previous round of public participation process ending 20 July 2026, a wetland delineation and specialist comment report was submitted by Freshwater Consulting (Frenzel-Daniels and Ewart-Smith, 20 July 2026), commissioned by UVA Prop (Pty) Ltd, the neighbouring landowner. Lornay Environmental Consulting, as the appointed Environmental Assessment Practitioner (EAP), as well as the project specialist team, have considered this report and conclude that the findings as outlined in the BAR remain unchanged and in line with the team's specialist. This statement sets out the basis on which the EAP and the project specialists continue to support the wetland delineations, assessments, and mitigation measures prepared for the application, and motivates that the Department base its assessment of the application for Environmental Authorisation on the findings and outcome of the various specialist studies as conducted during the Basic Assessment process which commenced in 2018.

- The wetland on Erf 1486 has been independently assessed on five occasions since 2018 by four separate specialist as well as a site specific Terrestrial Biodiversity Impact Assessment:
 - EnviroSwift (Joshua Gericke, 2018)
 - Delta Ecology (Kimberley van Zyl, Robyn Morton and Joshua Gericke, 2023 and 2026),
 - Nick Steytler Wetland Delineation and Peer Review (2025)
 - and Nick Helme Botanical Surveys (2023, 2025 and February 2026, addressing terrestrial and botanical considerations).
- Each of these specialists is independently registered with SACNASP and has confirmed, in writing, that they have no vested interest in the outcome of the application.
- All of these assessments were undertaken using the field-based methodology set out in the Updated Manual for the Identification and Delineation of Wetlands and Riparian Areas (DWAF, 2008), together with the Application of the DWAF Method to Wetland Soils of the Western Cape (Job, 2009), which specifically addresses the atypical soil-wetness indicators found in sandy coastal soils in this region.
- Across this five-year record, the delineated wetland extent and configuration on Erf 1486 has remained closely consistent, with only minor differences in boundary positioning attributable to normal variation in field interpretation and survey tools. The long term data set provide consistent results over a long period of time.

- In a written motivation dated 6 September 2026, Kimberley van Zyl of Delta Ecology confirmed that she stands by the wetland delineation and findings presented in the Aquatic Biodiversity Impact Assessment: Erf 1486, Vermont V5.0 (Van Zyl, Morton and Gericke, 2026) and the Wetland Offset, Rehabilitation and Management Plan: Erf 1486, Vermont V2.0 (Van Zyl and Morton, 2026), and that these remain representative of her professional opinion having reviewed the Freshwater Consulting report.
- In a letter dated 5 September 2026, Nick Steytler of EnviroSwift Western Cape confirmed that the wetland delineation presented in his August 2025 letter-format report remains accurate, and that it aligns closely with the Delta Ecology delineation in overall extent and configuration.
- Nick Helme's addendum of 3 February 2026 confirms that the current preferred layout (Alternative 4) substantially reduces ecological impact relative to earlier layouts, excludes all permanent wetland and most seasonal wetland from the residential and road erven, and is, in his opinion, acceptable from a terrestrial ecology perspective subject to the mitigation measures set out in his reports.

Basis for the application for Environmental Authorisation

- The Delta Ecology impact assessment classifies the site as being of Very High aquatic sensitivity, records a Present Ecological State of Category D for the UVB wetland, and assesses the preferred layout as resulting in a wetland loss of approximately 0.024 to 0.027 ha, being the minimum achievable through the design iterations undertaken to date.
- The associated Wetland Offset, Rehabilitation and Management Plan, applying the Macfarlane et al. (2016) offset calculator, demonstrates a net surplus of 0.1016 hectare equivalents of wetland function and 0.8041 hectare equivalents of wetland habitat, achieving a net ecological gain through onsite rehabilitation, alien vegetation removal, revegetation, and improved stormwater and flow management.
- It is recognised that wetland delineation involves professional interpretation of field and supporting evidence, and that differences of professional opinion may arise between independent specialists reviewing the same site. The EAP notes this without seeking to characterise the relative merits of the Freshwater Consulting report, and records that the weight of independent, methodologically consistent specialist opinion gathered for Erf 1486 over the past five years supports the delineation, impact assessment, and offset strategy submitted with the application.
- Wetland delineation methodology requires the boundary to reflect field indicators and site conditions present at the time of assessment. Anticipated future changes in catchment land use or vegetation cover do not, on their own, provide a basis for extending a delineated boundary. The delineations relied upon in the application were prepared, and continue to be affirmed, on this basis.

On this basis, the EAP presents the available scientific data as gathered during the impact assessment phase, and requests that the Department base its assessment of the application for Environmental Authorisation on the specialist studies referenced above, together with the confirmatory statements of 5 and 6 September 2026 referenced above. The assessments were conducted over a long period of time and therefore provide a long term information set with consistently similar outcomes.

In addition, and based on these findings, the entire permanent and temporary wetland which equates to more than half of the property in question, will be secured as private open space, held in a Co-Management Agreement between the Overstrand Municipality and Developer and endorsed via council approval. This provides legal long term protection, which contributes towards the broader conservation and rehabilitation vision for the re-instatement of the ecological and wetland link between the Vermont Salt Pan and the Padda Vlei system at Botrivier.



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Encl: Delta Ecology confirmation letter dated 6 September 2026; EnviroSwift confirmation letter dated 5 September 2026
