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Lornay Environmental Consulting
Att: Michelle Naylor

WETLAND DELINEATION, ERF 1486 VERMONT, OVERSTRAND MUNICIPALITY, WESTERN CAPE

LETTER CONFIRMING ACCURACY OF WETLAND DELINEATION AND PROVIDING COMMENT ON THE FRESHWATER CONSULTING GROUP DELINEATION AND ASSOCIATED REPORTING

The owner of Erf 1486 Vermont, Mr Craig Saunders, proposes to develop Erf 1468 Vermont for residential purposes. The site is dominated by a channelled valley bottom wetland and accordingly requires authorisation in terms of the NEMA EIA Regulations (2014, as amended) and the National Water Act (NWA, Act 36 of 1998). The owner has appointed Lornay Environmental Consulting ("Lornay") as the Environmental Assessment Practitioner (EAP) to manage the required environmental authorisation processes.

Historically three delineations of the extent of wetland habitat on the site have been undertaken, one in 2012 (Ratcliffe, 2012) one in 2018 (Gericke & Moore, 2018) and the third in 2024 (Van Zyl & Morton, 2024). The wetland delineations have been disputed by local environmental interest groups and accordingly Lornay appointed EnviroSwift Western Cape ("EnviroSwift") to undertake a fourth delineation which was presented in a letter format report (Steytler, 2025). Subsequent to this, a local Interested and Affected Party appointed the Freshwater Consulting Group (FCG) to undertake a fourth wetland delineation, the outcome of which suggested that the extent of the wetland was significantly greater than all three previous delineations (Frenzel-Daniels & Ewart-Smith, 2025). EnviroSwift has reviewed the FCG report and is wholly confident that the delineation presented in the EnviroSwift letter-format report (Steytler, 2025) remains accurate and wholly aligned with best-practise for wetland delineations (DWAf, 2008 and Job, 2009).

EnviroSwift has the following comments on the FCG report delineations (Frenzel-Daniels & Ewart-Smith, 2025) insofar as the independence of the reporting and alignment with best-practise is concerned:

- The FCG report does not constitute an independent specialist report as it was not commissioned by an independent EAP as part of an EIA process. It was commissioned by an I&AP with a specific interest in the project.
- Scope of the FCG assessment exceeds the standard for wetland delineation. This is evident in the Terms of Reference (ToR) where FCG indicates that they were commissioned to undertake a "detailed" delineation.
- FCG indicates that there is a permanently saturated core dominated by indigenous vegetation including *Senecio halmilifolius*, *Orphium fructsecen* and *Plecostachys serpyllifolia*. The three species indicated are not typical of the wetland permanent zone but are associated with the wetland seasonal/temporary zone. This introduces uncertainty as to whether FCG is mistaking the seasonal/temporary zone with the permanent zone. Further, they state that the temporary zone has more terrestrial species but no mention is made of the temporary zone hydrophytic vegetation which again suggests that the FCG may be confusing the temporary zone with terrestrial areas. This could have resulted in terrestrial areas being indicated as wetland which is not correct. The report also goes on to mention *Disa hallackii* which is a terrestrial species. The relevance of this is also questioned as it is not associated with freshwater ecosystems.

- An example of a questionable aspect of the FCG delineation concerns the berm inside the property near the Lynx Road boundary which was indicated as wetland. This area was indicated as terrestrial in both the Delta and EnviroSwift reports which is the correct status afforded to a *Pennisetum clandestinum* (kikuyu) and *Metalsia muricata* (blombos) dominated berm adjacent to a road platform.
- FCG states that the wetland assessments since 2005 show considerable variation. All previous delineations are in fact very similar with the FCG delineation being the statistical outlier.
- FCG states that field observations undertaken during the current study indicate notably wetter conditions on the site. It is queried how this statement can be made after just a single site visit. Surely two site visits at least needed to determine such a trend.
- Soil characteristics in the area dominated by quartzitic sands do not show wetland signatures and therefore the delineation needed to rely more on vegetation, position in the landscape and hydrology. For this reason, exhaustive augering was not conducted by Steytler (2025). This approach is consistent with best practise (Job, 2009).
- Wetland delineation methodology requires that the specialist indicate the edge of the wetland temporary zone as being the outer edge of the wetland. The delineation is based on the current site information and not what may be happening in the future. If climate change or other factors such as alien clearing need to be considered they are not considered in the delineation (i.e. one does not make the wetland area bigger). There is also no requirement to consider the "lag" time for the vegetation to respond to hydrological variation.

Prepared by:



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