

5 November 2013

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Overstrand Municipality Integrated Development Framework

The South African National Biodiversity Institute (SANBI) derives its mandate from the National Environmental Management Act (NEMBA), 2004. SANBI is mandated, *inter alia*, to act as an advisory and consultative body to organs of state and other biodiversity stakeholders; and further to specifically make recommendations to organs of state and municipalities on the alignment of their respective planning frameworks with the National Biodiversity Framework and spatial biodiversity plans.

In this respect, SANBI would like to commend the Overstrand Municipality for undertaking an Integrated Development Framework (IDF), which is intended to guide the future development of the municipality for the next 30 to 40 years. SANBI provided data to the municipality's service provider early in this process. Our comments below are intended to advise the municipality on the reflection and integration of biodiversity into the IDF. SANBI believes in the efficient use of landscapes as not only a way of promoting the protection of biodiversity, but also as a way of promoting optimal development futures that respond to the social priorities of South Africa.

We trust that you find the below comments constructive:

1. General Comments:

Given the long-term nature of the IDF, SANBI recommends that the IDF draws more strongly (or references more clearly) the existing relevant research/policy of the day. This makes it easier to contextualise the IDF into the broader land-use policy landscape. Specifically, the IDF appears to have incorporated the Guiding Principles of the Western Cape's Rural Land Use Planning and

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Management Guidelines (2009) (pp14) (hereafter referred to as the “Rural Guidelines”), but the implications of applying the rural guidelines is not reflected in the spatial plans. The link between the urban edges, how densification is being promoted and sprawl being limited, as well as how social integration to overcome previous apartheid planning will be implemented are not clear in the IDF nor on the maps. We recommend that this be explicitly reflected; we think that this an excellent opportunity to display socially progressive planning, given the long-term nature of the IDF. SANBI further notes that the IDF has not used the same spatial planning categories as the Rural Guidelines or the Provincial Spatial Development Framework (core, buffer, etc.), which makes it difficult to relate the IDF to other planning frameworks – both provincial as well as international (e.g. biosphere reserve planning).

1.1 General comments for Maps:

Most of the settlements within the municipality are located next to estuaries. SANBI therefore recommends that all plans within the IDF reflect the estuarine functional zone, as it relates to ecological functioning as well as disaster risk reduction¹. The estuarine functional zone should therefor inform the future urban edge delineation around the towns that are situated on estuaries. Ideally, development should try to stay outside of the estuarine functional zone or out of the 1 in 100 year flood line.

The colours used for biodiversity features on many of the maps are counterintuitive and the display of overlapping features can also be improved. In addition, SANBI feels that there is no need to show different data sets in different maps, the maps need to use one standard Protected Areas layer with the same terminology and colours. We have made comments to this effect throughout the remainder of the document.

2. Detailed comments, presented per section of the IDF report.

2.1 Our People (point 2.3 of the IDF)

SANBI recommends that the demographic overview of the municipality explicitly recognises the relationship between income and race, and especially how these are configured spatially. Social need and development potential are the fundamental aspects (or even drivers) to the planning future outlined in the IDF. It is our belief that the IDF therefore has to reflect how it will contribute specifically to the where, how, and why of service delivery. Recognition of the legacy of apartheid planning is therefore critical in overcoming it. In this vein, SANBI would also like to note that informal settlements have not been mentioned in the plan nor has how the municipality plans to deal with informality. SANBI suggests that the municipality consider adding these into the IDF as it is highly unlikely that all informal settlements within the municipality would have been eradicated by 2050.

¹ 1 Driver A, Sink KJ, Nel JL, Holness S, Van Niekerk L, Daniels F, Jonas Z, Majiedt P, Harris L and Maze K. 2012. *National Biodiversity Assessment 2011: An assessment of South Africa's Biodiversity and Ecosystems*. Synthesis Report. South African National Biodiversity Institute and Department of Environmental Affairs, Pretoria, 180 pages.

2.2 *Our Natural Environment (point 2.5 of the IDF)*

Plan 3

- The Department of Environmental Affairs has standardised the use of the terms “Protected Areas” for formally protected areas and “Conservation Areas” for informally protected areas, as defined by the National Environmental Management: Protected Areas Act (No 53 of 2003). SANBI recommends that the Municipality also use these terms.
- The “Wetland (NFEPA wetland map)” and “Wetland or Estuary FEPA” have the same colour on the map. SANBI recommend that the wetlands be categorized as either “wetland freshwater ecosystem priority areas” or as “other wetlands” using the NFEPA data set.
- For estuaries, SANBI recommends the use the estuarine functional zones as mapped for the National Biodiversity Assessment 2011 estuarine component. SANBI recommends separating estuaries into priority and non-priority estuaries, based on the estuaries data from the National Biodiversity Assessment 2011 as priority estuaries have specific management requirements such as requiring estuary management plans.
- The Marine Protected Areas should be categorised in terms of their zonation.
- This map legend indicates that only FEPA Rivers are shown. This is incorrect as the map also displays non-FEPA Rivers. SANBI recommends that the map differentiate between FEPA and non-FEPA reaches of a river.

Plan 4

- SANBI recommends that the map be renamed to “remaining extent of threatened ecosystems” as not all threatened ecosystems are critically endangered.

Plan 5

- It appears as if this map (based on the hatching) is showing both formally protected areas and conservation areas as “protected areas”. Please refer to our general comment with regard to differentiating between these types.
- SANBI recommends that the standard CBA colours be used for this map, with protected areas as the darkest shade of green and other natural areas the lightest shade of green.
- It is thematically better to have the terrestrial features as greens and the aquatic features as blues. There is no need to show wetlands on this map as this map shows the critical biodiversity areas, which will incorporate wetlands that are CBAs.
- The Marine Protected Areas should be categorised in terms of their zonation.
- In terms of layering, protected areas need to be layered on top, then CBAs, ESAs, then Other Natural Areas.

Plan 6

- SANBI recommends that “NPAES protected areas formal” be renamed “Protected Areas” and “NPAES protected areas informal” be renamed as “Conservation Areas”.
- The Marine Protected Areas should be categorised in terms of their zonation.
- It is unclear as to whether the NPAES formal protected areas were used here or if the latest SANBI protected areas layer was. The latest SANBI formal protected areas layer should be used to show the location of protected areas in all the plans.

Plan 7

- SANBI would like to enquire where the “high density alien areas” data was sourced from. There are only a few recognised alien invasive datasets, and this information is crucial in evaluating the input.
- The Walker Bay Marine Protected Area is not shown in this map, but in all the other maps. As per our previous comment, please use the same Protected Area layer consistently.
- SANBI would like to recommend that the name of the plan be changed from “Land Cover Transformation” to “Land Cover” or “Irreversibly Modified”. This map shows natural areas as well; therefore land cover transformation is not the best title. Furthermore, given that ‘transformation’ has a specific meaning in our society, SANBI recommends using other terminology. From a biodiversity perspective we typically use ‘irreversibly modified’, but again, as this map is from a spatial planning perspective, perhaps referring to it in terms of its land-use categorisation is perhaps more suitable.

Plan 8

- It is our opinion that the core urban areas around Betty’s Bay, Greater Hermanus and Greater Gansbaai within the municipality are too wide as they appear to be encroaching on endangered ecosystems, CBA’s, wetlands, and areas of high agricultural potential.
- Furthermore, we find it difficult to reconcile the degree to which pertinent biodiversity information is being reflected in the report with how poorly it is used to a) inform the desired spatial form of the town and/or b) to provide reasons for why other factors have been prioritised above the natural environment. SANBI concedes that there will be trade-offs, but we would like the IDF to reflect how such trade-offs were considered. This will enable greater transparency and understanding of the reasoning behind the urban edge delineation.

Plan 9:

- SANBI would like to enquire as to what qualifies/is categorised as “non-agricultural” uses?
- SANBI recommends the use of the term “Protected Areas” and not “Protected Natural Areas”

Plan 10:

- SANBI suggests that this map can be thematically improved if the current farms are outlined and the relative primary production potential is shown in colour. SANBI further suggests removing the urban areas from this map as they do not need to be shown.

Plan 11

- SANBI recommends that in addition to using the 2013 Growth Potential Study when analysing the information, the municipality should also incorporate the biodiversity information to further refine the map.

Plan 12

- SANBI suggest using the 2013 Growth Potential Study as the social needs of some of the towns have changed, for example Pringle Bay and Betty’s Bay are now listed as having a high social need.

2.3 Plans (point 4.5 of the IDF)

2.3.1 General Comments:

Plans 14- 26

- Protected Areas and CBAs colours are coded incorrectly as CBAs on the legend of these plans. SANBI recommends that the IDF use the same spatial planning categories (cores, buffers, etc.) as the Provincial Spatial Development Framework and the Rural Guidelines
- SANBI would like to recommend that all the features shown on the map also be shown on the legend on the map which is on the same page as the map and not on a separate page.

2.3.2 Specific comments:

Plan 17

- SANBI notes that the golf course has been placed inside the urban edge. SANBI further notes that the Western Cape's Guidelines for Golf Courses, Golf Estates, Polo Fields and Polo Estates (2005) indicates that if houses are built on a golf course, that the houses must be within the urban edge and the golf course can be outside the urban edge. Clarifying this through spatial explicitness and/or reasoning would be useful.

Plan 18

- SANBI would like to enquire as to why Arabella and Benguela Cove, which are resorts located in Core 1 areas, have been given urban edges. Does the municipality foresee residential development in these areas? It is our understanding that in terms of the Western Cape Resort Guidelines (2005) (pp15) and the Provincial Spatial Development Framework 2009 (Objective 8), residential development in Core 1 areas is not desirable.

Plan 19

- SANBI suggests that development be limited to the west of the R43 as it will be encroaching on agricultural land. In addition, SANBI recommends that the development which is currently over the R43 be contained to that area and not be allowed to expand any further. SANBI further recommends that an urban edge be placed to the south of Hawston to limit sprawl.

Plan 20

- SANBI notes that Hermanus does not appear to have an urban edge on the western side. It is presumed that this extension encapsulates Walker Bay, but there is no urban map for that settlement. SANBI recommends that this error should be fixed.

Plan 21

- SANBI notes that there are open space linkages between the golf course and the CBA to the north. However, as the CBA is of a higher value than the open space linkages of the golf course, SANBI feels that these urban linkages are not necessary. Instead, the maintenance of the CBA as a corridor should be prioritised and reflected.

Plan 23 (Gansbaai)

- SANBI suggests that the urban edge around Gansbaai be limited to the existing built footprints of the settlements located along the coast to protect the high value agricultural land and to maintain the linkage between the mountain and the sea.

Plan 23 (Pearly Beach)

- This map should be Plan 24. SANBI recommends that the urban edge be tightened around the town. Specifically, SANBI is concerned about how the urban edge has been extended past the settlement to the north of the historic town. The two settlements should be encouraged to grow together through the open space between them and not further apart by allowing the settlement to the north of the town to keep expanding north.

Please feel free to contact SANBI at any time if you have any enquires.

Yours sincerely

PR 
5/11/2013

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