

2.6 Environmental comments

The following comments have been provided by the environmental component with the Directorate: Environmental and Spatial Planning: Region 2:

2.6.1 Plan 3: National Fresh Water Ecosystem Priority Areas:

It is imperative that distinct colour notation be utilised especially for "land base" and "informal base". By convention, colours that are to be used to indicate settlements or vacant land are brown and black. These colours are used to avoid confusion between the vegetation and the land demarcations. See attached Breede FEPA Map (Annexure A).

2.6.2 Plan 4: Remaining Extent of Critical Ecosystem:

The associated map does not include the Protected Areas and the Least Threatened areas. It is crucial to incorporate them to assist decision makers as they will see which areas to protect and guide development. Please refer to the Ecosystem status for the Western Cape, Ecosystem guidelines for environmental assessment in the Western Cape

2.6.3 Plan 5: Critical Biodiversity Areas Map

The CBA mapping of Overstrand would be improved by the inclusion of "special places" in the legend. In terms of Critical Biodiversity it is imperative to differentiate between the CBA Terrestrial and CBA Aquatic. The legend does not include the "No Natural Remaining Areas" and it is important to clearly state where there is no vegetation and state the future plans for these particular areas. It is recommended that you indicate the urban areas, settlements and roads.

2.6.4 Plan 6: National Protected Area Expansion Strategy:

It is advised that one colour denotation be used for the protected areas. The lines used to identify the NPAES Protected Areas Formal and Informal would be improved and made more legible through the use of different shades e.g. light and dark green, etc.

2.6.5 Plan 9: Land uses on a municipal scale:

It would be advisable to change on the "Non-Agricultural uses" on the legend to "No Natural Areas Remaining".

2.6.6 Plan 14. Rooiels:

The urban Edge cuts through the CBA. Drawing the line on the critical area that needs to be protected should be avoided. The CBA maps should be used when delineating the urban edge to protect it from urban sprawl and to encourage efficient settlement patterns. The Star sign which indicates the beach does not appear in the Legend. It is important to include the sign in the map and Legend to make it easy for the reader and to expedite decision making. The light green colour is not included in the Legend but in the explanation is regarded as Open space. It is important to also include it in the Legend.

2.6.7 Plan 23: Gansbaai:

There is an orange line on the map; which is not denoted in the legend. The explanation in the Key Actions (Plan 23) specifies it as Heritage Areas. The area indicating the open space linkage should also be included in the legend. The grey colour on the map should be explained and included in the legend to avoid confusion. Settlements should also be specified on the map and shown on the Legend.

- 2.6.8 In recognition of climate change as one of the biggest challenges facing human kind, the IDF needs to address climate change issues and commit to include the Coastal Setback Lines when the lines are delineated. The IDF does not mention flood plains, but it is imperative that these areas be highlighted and protected.

3. Conclusion

- 3.1 From a spatial planning perspective, the IDF provides the required strategic guidance in the preparation of additional plans and studies for the Overstrand area. It is reiterated that an SDF remains a core component and requirement of the IDP and as such it should provide guidance to the projects and programmes that are initiated through this process. Although the IDP has a five year cycle, it must be remembered that an SDF is not just a five year document and transcends the five year period. As such, it should provide even more predictability to the IDP projects and programmes which allows for better planning and budgeting.
- 3.2 In terms of the key action plans and their associated plans for each town, it is imperative that these objectives and principles be given more substance in the form of an updated SDF. It is clear that more detailed proposals are necessary in terms of development within these towns, tourism, environmental aspects as well as heritage. In terms of heritage aspects it is clear from the plans presented in part 4 of the IDF that

many heritage aspects have changed. It would be advisable for further heritage studies to be done in order to validate the changes that have occurred with regards to the heritage aspects when compared to the 2006 Overstrand SDF.

- 3.3 From an environmental point of view, it is important that priority areas such as the coastal setback lines be identified.
- 3.4 Biodiversity priorities have been integrated into the IDF however the CBA should be indicated as the terrestrial and the aquatic components separately to avoid confusion. The general overarching principles should then be translated into easily applicable criteria for land use planning.
- 3.5 Thank you for the opportunity to provide comment on your comprehensive document. I trust that the above is in order. Should you have any further enquiries, please do not hesitate to contact Ms Jeanine Africa of this Department.



Marek Kedzieja

Head: Environmental and Spatial Planning: West Coast, Metro and Overberg (Region 2)

DATE: 11 FEB 2014