



PRINGLE BAY RATEPAYERS' ASSOCIATION

PRINGLEBAAI BELASTINGBETALERSVERENIGING

SARS Reg. 9101/138/16/3

NPO Reg. 214-205

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30 September 2021

Senior Manager: Fire & Disaster Management and Security

OVERSTRAND MUNICIPALITY
HERMANUS
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Dear Mr Smith

COMMENTS ON THE DRAFT POLICY FOR CREATING AND MAINTAINING FIRE WISE VACANT ERVEN IN URBAN AND SUBURBAN AREAS OF THE OVERSTRAND MUNICIPALITY: FEBRUARY 2020 EDITION

1. ORGANISATION

The Pringle Bay Ratepayers' Association (PBRA) was started in the late 1960s by the first residents of Pringle Bay to represent the interests of ratepayers and residents. Today it is a registered Non-profit, Public Benefit Organisation.

Our primary functions are, amongst others, to liaise with the Overstrand Municipality, with whom we enjoy a close relationship and to support local environmental conservation. We represent the community on the local Ward Committee and other consultative bodies. We maintain close contact with local authorities and service providers, particularly on matters affecting ratepayers and residents.

The PBRA represents the rate payers within the declared Urban Edge. This currently constitutes approximately 1,800 properties (erfs) of which approximately 1,000 are developed (thus having a habitable structure erected on it either for residential or business purposes).

Having considered the subject DRAFT policy, we hereby submit our comments for consideration.

2. COMMENTS

2.1. Based on enquiries and feedback from our members in the past and recently, as well as consultation with affected Civic groups such as Pringle Bay Hackers Group and Hangklip Environmental Action Group (HEAG), we take the liberty of raising the following issues:

a) The subject draft policy proposes:

“8.2.3 Grass and indigenous ground-covering plant species must be maintained at a maximum height of 500mm (0.5m);

.....

8.3.3 Reduce (thin out) the density of vegetation by a minimum of 50% across the area of the erf;

.....

8.3.5 Maintain grass and indigenous ground-covering plant species at a maximum height of 500mm (0.5m).

The above-mentioned standards have been deliberated with your department as far back as 2015. Since then it has been pointed out on several occasions that it is considered unacceptable to adopt such an indiscriminate and inappropriate standard. It has been argued that a more applicable standard should be adopted taking cognisance of the characteristics of our indigenous Fynbos flora as well as the fact that Pringle Bay is indeed a declared Conservancy and neighbours at least three other Conservancies not to mention our near proximity to the Kogelberg Biosphere Reserve albeit within the Transition zone.

Previous comments and requests in this regard were not recognised in policy revisions and are still being ignored, hence our request, once again, to:

i) Consider redrafting the policy such that appropriate standards for the Overberg Area be drafted that will be in harmony with our unique Fynbos flora. The unique characteristics of our Fynbos must be taken into consideration and appropriate height and density standards should be devised. We are of the opinion that an umbrella 500mm restriction is inappropriate as has been stated in the past. The probable diverse occurrence of Fynbos species on a plot/erf and taking cognisance of the general occurrence of species in the area, should be guiding factors in

determining a variable height restriction on a particular plot Surely a full grown Protea bush should not be trimmed down to 500mm!

- ii) The redrafted standards must subsequently be reissued for comment.
- iii) Furthermore, we sincerely request that due consideration be given to acknowledge the status of the Conservancies to qualify for exemption from the general policy allowing for specific standards applicable to conservancies only. This, in our opinion, will result in a better fulfilment of our role as a Transition Zone between the conservancies and the Kogelberg Biosphere Reserve's Buffer Zone and ultimately the Core Zone.

2.2. The only reference to Street Corridors / Road Reserves is the following:

"3.9 Areas such as roadside verges, public gardens, parks, fire breaks or sports/playing fields where continuous maintenance takes place, are subject to compliance with the minimum standards of this policy."

We acknowledge with much appreciation your emphasis on the importance of maintenance of our road reserves ("*...roadside verges ...*"). We are however of the opinion that in terms of a "Fire Wise" policy, street corridors deserve more attention. We thus suggest to consider further highlighting the value and function of street corridors by for instance defining the type of plants preferred; for example, only indigenous ground covers in road reserves and that it be maintained by the Municipality in accordance with a declared program allowing for appropriate budgeting. Proper landscape design of particularly the road reserves will not only contribute towards establishing reliable firebreaks, but will also largely improve traffic safety. The former is an important component/element in containing the spread of fires. The supplementary function and value of a properly maintained street network will come to the fore and notably reduce the reliance on "cleared plots" to assist in containing fires.

2.3. The DRAFT policy further states:

"4.8 The appointed contractor(s) will be provided with specific instructions, including plot numbers and time frames for the clearing of erven."

We acknowledge the importance you place on the issuance of clear instructions to the executing agency (“... *appointed contractor* ...”). It is in our opinion equally important to also ensure the **competency** of the executing agency. In Chapter 10 of the DRAFT Policy mention is made of the Milkwood Trees and other Protected / Endangered Plants. We are of the opinion that the executing agency should have thorough knowledge of our environment and the uniqueness and importance of the Fynbos flora around us. Plot clearing exercises in accordance with the finally accepted standards must be carefully managed by a properly qualified/experienced/knowledgeable person to ensure that indiscriminate removal and/or trimming of these plants do not occur. ***We strongly suggest to also engage with the local Hacker Groups on how they can assist in fulfilling or complementing this role.***

We once again submit, as in the past, that the process of plot clearing should be one of: **Firstly** clearing the plot of all forms of alien/invasive plants and ensuring that the resprouting of same could not occur (using appropriate herbicides to kill remaining stubs). **Secondly**, the desired density on the plot must be achieved by removing “old wood” or dead wood followed by older branches of the vegetation until the desired standard is achieved.

- 2.4. The policy seems to be drafted specifically to address ONLY open residential erfs as is stated in:

“2.4.2 To provide for the identification of fire hazards on all vacant erven within the urban areas of the Overstrand Municipality, excluding, Open Space 1 and 2 properties that are managed by the Municipal Environmental Management Services Department and described in the Environmental management overlay Zone Regulations as areas of conservation concern. “

It is unclear what the applicable standards for developed erfs in terms of “Fire Wise” are. Is it the intention that another set of complimentary standards will be devised for developed erfs?

Furthermore, we strongly suggest that the OM in conjunction with qualified and experienced person(s) and/or organisation(s) (such as for instance the Harold Porter

Botanical Society) should develop and publish a **recommended plant list** for use by those rehabilitating plots/erfs post clearing or building activities.

3. CONCLUSION

The PBRA strongly supports the development of an appropriate set of “Fire Wise” standards and wishes to express our appreciation for the effort in this regard to date.

We do however feel that more focus is needed to address the uniqueness of our floral kingdom in devising appropriate “Fire Wise” Standards with specific emphasis on:

- i) **Height restrictions** which we believe must be more species specific than only stating 500mm;
- ii) **Density** by focusing on the removal of dead wood and old branches rather than an indiscriminate 50% of coverage;
- iii) **Specific standards** related to Conservancies be developed such that the function of conservancies as a Transition Zone to the Kogelberg Biosphere Reserve is acknowledged and emphasised.
- iv) Finally to develop the “Fire Wise” standards to address not only undeveloped erfs but also developed erfs including guidance on plant species appropriate for land rehabilitation purposes.

Thank you for the opportunity to submit comments which we trust will be given the deserved attention and respect.

Kind Regards



Bertie Vorster
Vice Chair: PBRA