



Rooiels Ratepayers Association (RERA)

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The Senior Manager
Fire Safety & Health and Safety Overstrand Municipality
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Rooiels Ratepayers Association Comments on

DRAFT POLICY FOR: CREATING AND MAINTAINING FIRE WISE VACANT ERVEN IN URBAN AND
SUBURBAN AREAS OF THE OVERSTRAND MUNICIPALITY

Dated September 2021 revised version that was circulated in late 2021

17th February recirculated with an extension to 4th March for comment on the revised draft

We would like to thank the Overstrand Municipality (OM) for their dedication to the welfare of residents and for supporting efforts to reduce fire hazards. We applaud the OM for recognising the serious problem posed by invasive alien vegetation and request that this is more strongly recognised throughout the Policy. We support the Preamble which highlights the significant difference in approach required for alien and indigenous vegetation. We do not accept that the Community Safety By-law does not differentiate between alien and indigenous or endemic vegetation. We ask that the Policy should clearly differentiate between vegetation indigenous to the area and alien invasive vegetation which is known to be a very serious fire hazard.

We consider it critical for the safety of the area that alien vegetation, particularly the highly flammable invasive alien vegetation such as *Acacia cyclops* and *Pinus* species be the focus of a firewise policy. We STRONGLY request and advise that the Overstrand Municipality should make a particular effort to address the significant danger posed by alien vegetation and especially invasive alien vegetation. If necessary the relevant Community Safety By-law should be amended to give recognition to the destructive role of these invasive alien trees in our environment as an extreme fire hazard. Most certainly this new Policy must acknowledge the importance of clearing these highly flammable and dangerous trees – the recent fire in Kleinmond gives witness to how important it is.

We congratulate the OM for differentiating the areas that are within the biosphere reserve as indicated in Clause 8.3. Please can you confirm that you acknowledge Rooiels as being identified as part of a proclaimed biosphere area within the context of Section 8.3.

Here below are our specific requests for small changes *in italics and highlighted in red*. They follow the numerical sequence of the Draft Policy and focus primarily on giving greater emphasis to the removal of alien vegetation, giving more consistent recognition to the need to differentiate the villages in the biosphere reserve and to applying the policy in a way that involves the local registered Conservancies in order to guide efforts to avoid unnecessarily reducing biodiversity in the Overstrand, especially areas falling within the Kogelberg Biosphere Reserve.

The role and danger of alien vegetation for fire has been highlighted very strongly in recent fires in the Overstrand and in the fires in Knysna and even Cape Town.

Many of South Africa's vegetation types are dependent on fire. However, invasives may alter natural fire regimes through changes to the flammable biomass. The most problematic invasives in fynbos are trees and shrubs, for example pines and Australian Acacias that are larger than the native shrublands. Fuel loads can increase by up to 60% in invaded fynbos, which could then support higher intensity fires.

We would like to see this as a key focus of fire prevention efforts throughout the Overstrand but most particularly in the Rooiels area and other Conservancy villages in the transition zone of the Kogelberg Biosphere Reserve.

THEREFORE, for protected and biosphere areas, we ask that

Clause 2.4.1 **remove** "irrespective of the type of vegetation" and **replace** that with "*in particular alien vegetation*".

It is especially important for the protected areas and the villages within a proclaimed biosphere. You could differentiate if you feel that alien vegetation does not pose such a significant threat to urban areas. But for the Conservancy villages we request that removal of alien vegetation is given high priority.

For those villages that are located within the Kogelberg Biosphere Reserve, we ask that where an Erf or public area is required to clear vegetation for fire safety¹, that in addition to notifying the owner, the Overstrand Municipality (OM) also notify the relevant Ratepayers Association, or their Conservancy or the Ward Representative. This means that they will be able to follow up with the process and can ensure that the clearing of the fire hazard is carried out in a way that enhances, rather than diminishes, biodiversity.

THEREFORE we request that Clause 2.4.3 should include a provision – for those villages within the KBR – that articulates this. Suggested additions in red - so that it would now read

2.4.3. "To enable the process of notifying owners *and their local Conservancy*, of the fire hazards presented by *alien or* overgrown erven"

2.4.5 – refers to privately and publicly owned vacant erven including public common areas within **urban borders** to continuously conform to minimum standards. We propose that those standards are set specifically and separately for the villages within the KBR in accordance with clause 8.3. For example a full grown protea bush should not be removed and it is likely to be higher than 500mm. It is essential to have appropriate standards for the protected areas and the areas within the transition and buffer zones of a declared biosphere reserve.

3.4 We applaud the OM for stressing the importance of manual clearing rather than machine clearing in protected areas. We request that this be extended to include the villages in the KBR – thus we are suggesting that as you have done in Section 8.3, you make this specific to both proclaimed protected areas and also those areas that fall within the Kogelberg Biosphere Reserve

¹ (when there is a firewise hazard or a proposed change of ownership)

3.4 “Only manual clearing methods shall be used for reducing fire hazards in areas proclaimed as protected *and in declared biosphere areas.*”

4.3. It may not be possible to rely on registered mail in the future – this is something that the OM will need to consider going forward. As indicated in 2.4.3 above, we request that the registered Conservancy, where the relevant Erf is located, also please receive such notification by email if possible or in whichever way the OM prefers.

4.3 Compliance notices, *with a copy to the registered Conservancy*, will be served on land owners by registered mail through the

4.7. We request that the registered Conservancy or the Ratepayers Association or the relevant Ward representative should be involved in the decisions to appoint any contractor that will be working in their village. If that is not possible, then they should at the least to be notified and the contractor should be required to engage with the locally registered Conservancy.

It is very important, a) that the relevant contractor is aware of the specialised vegetation in that locality and b) that they keep the sensitivity of the biodiversity and the character of the village while undertaking the work. There are a number of plants that are endemic only to this area, some that are specially protected and others that are particularly important to the biodiversity of the area. It is important that someone knowledgeable is involved when there is Erf clearing in any of the areas that are in the transition or buffer zone of the KBR.

Thus we request

4.8 “The appointed contractor(s) will be provided with specific instructions, including plot numbers and time frames for the clearing of erven *and shall be requested to work closely with the local registered Conservancy for areas within the KBR transition or buffer zones*”.

8.2 – No comments on this section since all of Rooiels falls within a proclaimed biosphere area.

8.3

We are concerned about the arbitrary nature of some of these clauses – e.g. 50% of very little vegetation would not make sense and equally there is NO reference to the alien vegetation which is a primary hazard for fire. 500mm is too low for some species. Suggest change

8.3.3 “*All alien vegetation must be removed and where/if the erf is identified as having dead vegetation this should be removed and severely overgrown indigenous vegetation should be thinned appropriately.*”

Please can you make reference to the importance of giving consideration also to biodiversity and to this end we suggest:

8.3.8 “The clearing of erven shall be done in a manner that does not contribute to soil erosion *and that is carried out sensitively to retain the biodiversity and the scenic value of the area.*”

10 – Would it be possible to insert into this Table that for proclaimed biosphere and protected areas

10.2 - ...”issue of Compliance Notices to the owner *and the relevant proclaimed Conservancy*

10.3 “Instruction to Private Contractor *and Notification to the relevant proclaimed Conservancy*”

We request that the Overstrand Municipality provide feedback to those who have submitted comments so that we are aware of what steps have been taken to address these concerns.

Yours faithfully



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