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Green Door Environmental
PO Box 11, Hilton, 3245

Dear Roxanne and Rebecca

Please note my comments below as an IAP concerning the proposed VCC Hospital development.

The following issues must be noted regarding the Basic Assessment process for the proposed establishment of the Victoria Mother and Child Centre of Excellence, Pietermaritzburg, KwaZulu-Natal.

I am extremely concerned about the proximity and associated effects of the above development on the ecological processes of the grassland at Queen Elizabeth Park adjoining the proposed hospital site for the reasons below:

1. This small grassland contains one of the few remaining populations of the endangered Hilton daisy (*Gerbera aurantiaca*). This species is only found in pristine mistbelt grassland and is regarded as a flagship species of the Midlands Mistbelt Grassland.
2. Although grassland site is mapped as Moist Hinterland Grassland it must be taken into account that fine scale vegetation maps are not ground-truthed and therefore the boundaries may be marginally arbitrary. The late Rob Scott-Shaw (EKZNW botanist) was of the opinion that the site is in fact Midlands Mistbelt Grassland, which is Endangered Other botanists (including myself) who are familiar with local vegetation agree with this. The QEP grassland contains a suite of species characteristic of Midlands Mistbelt Grassland
3. The grassland contains a number of other endemic plant species typical of the highly threatened Midlands Mistbelt grassland
4. These grasslands are a fire climax vegetation type and need to be burnt every second year to maintain species diversity and prevent encroachment of woody species. Failure to regularly burn the grassland will result in loss of many of the plant and pollinator species.
5. The grassland is in a formally protected area and therefore requires an adequate buffer zone.

6. It is essential that natural areas such as the QEP grassland are kept in their pristine state for the benefit of future generations, including those children for whom the hospital is intended.

The following must be noted

The proposed plan indicates both the hospital building and the eastern staff accommodation buildings are situated much too close to the Queen Elizabeth Park boundary and should be relocated further away to allow a greater buffer area around the grassland. The detrimental 'edge effects' of habitation on natural vegetation are well known. An adequate buffer zone (to be determined in consultation with Ezemvelo KZN Wildlife ecologists and other experts) is essential.

Regular grassland fires are essential for the survival of the threatened plant species and the maintenance of the grassland. The QEP grassland is currently burnt every two to three years, and a boundary firebreak is burnt every year. It is essential that this practice is allowed to continue, and the proposed hospital must acknowledge this and take it and any effects on hospital functioning into account when planning.

Regards

A handwritten signature in black ink, appearing to read 'I Johnson'.

Isabel Johnson