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reference: **LE14/2/6/1/75/1/RE185_Cemetery_Goue Akker**
date: **29 October 2020**

Sharples Environmental Services cc,
P.O. Box 443,
Milnerton, 7435

Attention: Ms Ameesha Sanker
By email: ameesha@sesc.net

Dear Ms Ameesha Sanker

THE PROPOSED EXPANSION OF THE EXISTING “GOUE AKKER” CEMETERY ON THE REMAINDER OF FARM NO.185 IN BEAUFORT WEST LOCAL MUNICIPALITY, WESTERN CAPE

DEA&DP Reference: 16/3/3/1/D5/11/0006/20

CapeNature would like to thank you for the opportunity to review your application on the remainder of farm 185 in Beaufort West. The applicant proposes to expand the “Goue Akker” cemetery by approximately 82 500 m², ablution and caretaker facility by approximately 69 m². Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

According to the Western Cape Biodiversity Spatial Plan (WCBSP 2017)¹ the Kuilsriver flows along the eastern boundary and National Freshwater Ecosystem Priority Area (NFEP) wetlands are mapped west of the property, which is surrounded by waste water treatment works. The river is part as an FEPA river corridor and the Great Karoo watercourse protection. Ecological Support Areas (ESA 1: Terrestrial/Aquatic and ESA 2: River/Wetlands) is mapped along the border and within the proposed expansion area. The vegetation unit on the property is Least Concerned Southern Karoo Riviere as listed in the draft ecosystem threat listings for the updated National Biodiversity Assessment (2018)².

Satellite Imagery would appear to confirm the botanical assessment in that the proposed expansion site is disturbed. It should be noted that in arid habitats disturbed areas could take years to rehabilitate, even from temporary disturbances. Therefore, after construction

¹ Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. Stellenbosch: CapeNature.

² Skowno, A. L., Poole, C. J., Raimondo, D. C., Sink, K. J., Van Deventer, H., Van Niekerk, L., Harris, L. R., Smith-Adao, L. B., Tolley, K. A., Zengeya, T. A., Foden, W. B., Midgley, G. F. and Driver, A. 2019. National Biodiversity Assessment 2018: The status of South Africa's ecosystems and biodiversity. Synthesis Report. Pretoria, South Africa. 214 pp.

rehabilitated illegal waste disposal areas and the watercourse, where required, with indigenous vegetation.

CapeNature is satisfied with the impacts and recommendations from the botanical and freshwater assessments. Both assessments indicated low impacts associated with the proposed expansion if the proposed mitigation measures are strictly implemented.

Several mammals are crepuscular or nocturnal and difficult to observe directly. We recommend including faunal species in the search and rescues. Furthermore, search and rescues must be continuous throughout the construction phase.

During the clearing of indigenous vegetation and alien invasive plants, areas susceptible to erosion must be protected.

It is essential to clearly mark invasive alien plants that will be treated with herbicides to avoid damaging and distinguishing indigenous vegetation.

In terms of the Alien and Invasive Species regulations, specific alien plant species are either prohibited or listed as requiring a permit; aside from restricted activities concerning, *inter alia*, their spread, and should be removed; without the use of heavy machinery³, especially in close proximity to the watercourse.

To prevent the dispersal of alien seeds, we recommended frequently washing construction vehicles and machinery away from any watercourse.

Stormwater run-off and soil disturbance might affect the river, especially in periods with high run-off. For that reason, minimized water run-off and pollution run-off as the river is in close proximity to the site.

Strictly adhere to stormwater management in order to avoid any negative impacts to the adjacent riverine system.

Implement topsoil management during the removal of topsoil to prevent soil erosion and contamination. The topsoil used in the rehabilitation phase should not be contaminated.

Removal of waste, generated during the expansion, must be disposed at a registered disposal facility. Implement the integrated waste management approach that addresses waste avoidance, reduction, re-use, recycling, recovery, treatment, and safe disposal as a last resort⁴.

CapeNature is satisfied with the proposed mitigation measures and rehabilitation plan as prescribed in the Environmental Management Programme.

The Environmental Control Officer (ECO) should be present, if possible, during the clearing of alien plant species and vegetation to ensure the implementation of the proposed mitigation and rehabilitation measures and to identify any harmful activities during the construction and operational phases.

In conclusion, the proposed site is transformed therefore we do not object to the proposed expansion. Throughout the development, the impact on the indigenous vegetation has to be minimal and erosion avoided, if possible. The proposed development should be restricted to the expansion footprint no disturbance should be beyond the 28 m aquatic buffer zone.

³ National Environmental Management: Biodiversity Act 2004. (Act No.10 of 2004). Draft Alien and Invasive Species Regulations 2018. Government Gazette no. 112

⁴ National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008). Consultation on the draft revised and updated national waste management strategy. 2019.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely

A handwritten signature in black ink, appearing to read 'MS', with a long horizontal flourish extending to the right.

Megan Simons
For: Manager (Landscape Conservation Intelligence)