



6 October 2025

Sharples Environmental Services
P.O. Box 443
MILNERTON
7435

Attention: Ms Jessica Gossman

Email: jessica@sesc.net
Tel: 021 554 5195

Dear Madam

**REMAINDER CAPE FARM 153, VISSERSHOK, PORTION 24 OF CAPE FARM 141 MORNINGSTAR AND
REMAINDER CAPE FARM 141 MORNINGSTAR, LOCATED OFF TRUNK ROAD 11/1 (N7): PROPOSED NEW
WEIGHBRIDGE – DRAFT BASIC ASSESSMENT REPORT
(DEA&DP REFERENCE: 16/3/3/1/A1/41/3042/25)**

The draft Basic Assessment Report (DBAR), dated August 2025, submitted under your e-mail communication, dated 2 September 2025, pertaining to the abovementioned project, refers.

The following comment is provided from the relevant City of Cape Town Departments based on the information provided in the DBAR report:

**1. Spatial Planning and Environment Directorate: Environmental Management Department -
Environmental and Heritage Management Branch**

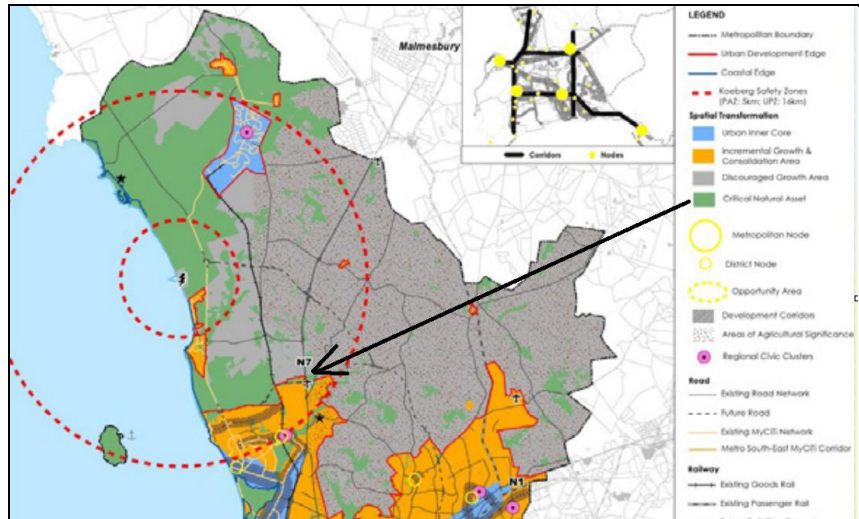
Draft Basic Impact Assessment Report (DBAR):

1.1. Section B, point 4: *Policies* (pages 24 to 25 of the DBAR) refer: The two relevant approved City of Cape Town spatial policies are the [Municipal Spatial Development Framework, 2023 \(MSDF\)](#) and the [Blaauwberg District Plan, 2023](#). Please list both spatial policies.

1.1.1. The summary in the DBAR (see the extract below) is not reflective of the Strategies, Policies and Objectives contained in the MSDF.

City of Cape Town Municipal Spatial Development Framework (MSDF, 2022/2023)
Land Use Management: The facility is proposed on City-owned land (Outspan Farm Erf 153), which is acceptable for transport infrastructure, and partially on adjacent privately owned land with no current conflicting land use.

1.1.1.1 According to the MSDF the subject site falls in an area earmarked as a Critical Natural Asset. The DBAR fails to disclose this information.



Extract from the MSDF Consolidated Spatial Planning Concept map. The location of the weighbridge indicated by the black arrow

- 1.1.1.2 Objective 9 of the MSDF commits the City of Cape Town to a *Healthy and sustainable environment*. In order to achieve this the MSDF lists several strategic intents, amongst other, Policy 18.3 contained under Substrategy 2.4: *Appropriately manage land development impacts on natural resources, green infrastructure and critical biodiversity networks*, that stipulates the following:

P18.3 Land development proposals and decision making to consider biodiversity connectivity, and the protection and reinforcement of existing critical natural assets and biodiversity linkages, where possible.

The location of the weighbridge is not consistent with P18.3 as it will sever a biodiversity corridor link for reasons further elaborated in this correspondence.

- 1.1.2. According to the Blaauwberg District Plan (2023), the site is identified as a “*Structuring Open Space*”.

- 1.1.2.1. From a strategic biodiversity perspective, the site is located between the Blaauwberg Nature Reserve and the Van Schoorsdrift Nature Reserve. The site is therefore the only remaining east-west biodiversity corridor link between die Van Schoorsdrift Nature Reserve - via the Frankendale Open Space link - to the Blaauwberg Nature Reserve. The biodiversity corridor link is visually overlayed (for ease of reference) on an extract of the Sub-District 2 map of the Blaauwberg District Plan in Figure 1 below.

- 1.1.2.2. The abutting Frankendale Industrial development's open space (indicated in dark green on Figure 1 below) was identified as a future east-west ecological corridor and subsequently protected as such in the Frankendale Industrial development Environmental Authorization. The adjacent City of Cape Town-owned Remainder Cape Farm 153 falls within the Vissershok Waste Management Facility's 800m “No-Go” buffer. The intent was therefore always for this portion of Remainder Cape Farm 153 to form part of the natural continuation of the ecological/biodiversity corridor.

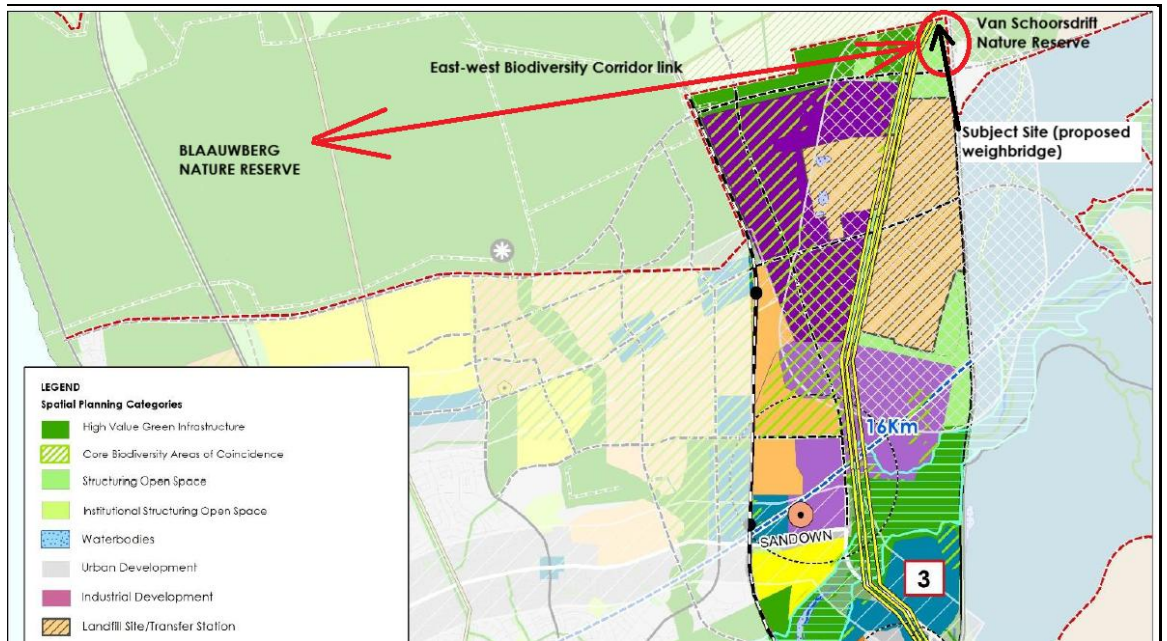


Figure 1: Extract from the Blaauwberg District Plan. Note the location of the proposed weighbridge in the middle of the east-west biodiversity corridor link between the Van Schoorsdriff Nature Reserve and the Blaauwberg Nature Reserve.

- 1.2. Most of the proposed weighbridge and its approach roads fall within farmland selected as a critical biodiversity area (CBA2), as well as a CBA1, on the latest Cape Town Biodiversity Network map (refer to Figure 2 below).

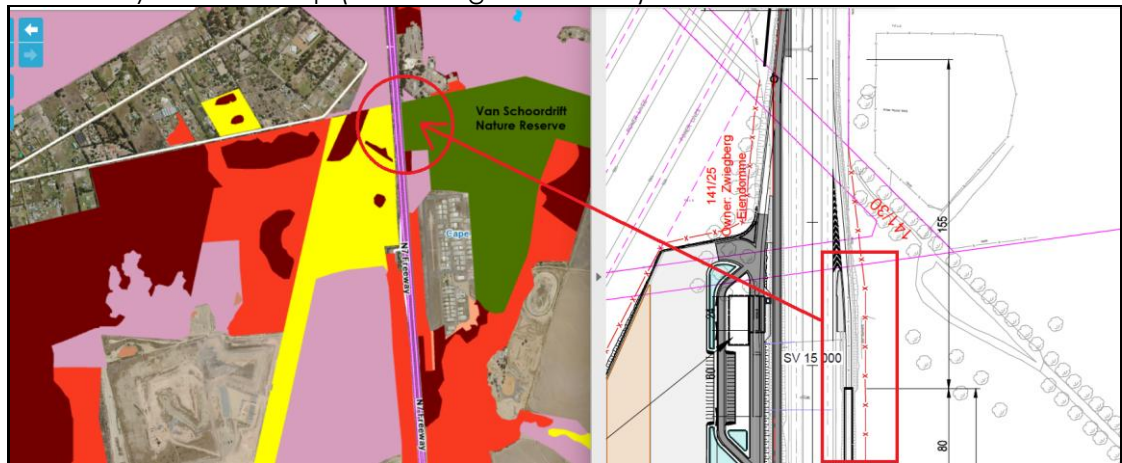


Figure 2: Extract from the City of Cape Town: Biodiversity Network Map with biodiversity areas overlay. Note the encroachment into the Van Schoorsdriff Nature Reserve (indicated in red).

- 1.2.1. The project furthermore impacts on the existing Van Schoorsdriff Nature Reserve. The south-bound approach road (i.e. the new incoming turning lane on the eastern side of Trunk Road 11/1) encroaches into the Van Schoorsdriff Nature Reserve as illustrated in Figure 2 above.

The Van Schoorsdriff Nature Reserve is home to more than 60 threatened species of plants and animals and is key site for the protection and restoration of Critically Endangered Cape Flats Sand Fynbos. In the short period since the Nature Reserve was established, immense effort has gone into invasive species clearing with the next phase focussing on ecological restoration. The nature reserve is in the process of being declared in terms of the NEM: Protected Areas Act (NEM: PAA).

Even the Botanical Specialist report acknowledges this as follows: “No High sensitivity vegetation should be lost in the proposed footprint. However, it should be noted that in the section east of the N7 the new layout **will intrude about 10m into a declared Protected Area**, which is currently managed for conservation. This area is degraded by a long history of alien plant invasion (now cleared), and is of low diversity, but is slowly rehabilitating.”

Any loss of Protected Area, irrespective of the habitat condition or extent, sets a dangerous precedent and should be avoided at all costs. Cape Flat Sand Fynbos is Critically Endangered, endemic to the City of Cape Town and currently has less than 10 % of the original extent remaining. Of this rare 10%, less than 2 % is formally protected classifying it as *Not Protected* in the latest 2022 National Biodiversity Assessment. Already a significant patch of Fynbos was recently lost, without mitigation, within the N7 road verge during the construction of the new intersection resulting in the loss of two populations of Critically Endangered species, *Marasmodes fasciculata* (with only three other remaining populations now) and *Leucadendron thymifolium*. No further loss of habitat, particularly within a Protected Area, irrespective of condition can be supported.

The encroachment into the nature reserve, as well as the severing of the east-west ecological / biodiversity corridor link, is not identified in the DBAR and therefore considered to be a fatal flaw.



Figure 3: A visual illustration of the location of the proposed weighbridge development's footprint in relation to the east-west ecological / biodiversity corridor link. The intact natural vegetation is clearly visible compared to the surrounding transformed urban development

In light of the above an alternative site further north along Trunk Road 11/1 must be sought (and assessed). In this regard, the agricultural land on Remainder Cape Farm 141 located between the R304 (Mamre road) and the M19 (Melksbosstrand Road) must be assessed as a site alternative. This stretch of agricultural land (illustrated on Figure 4 below) is 100%

transformed from a botanical perspective and therefore more suitable from a botanical perspective.

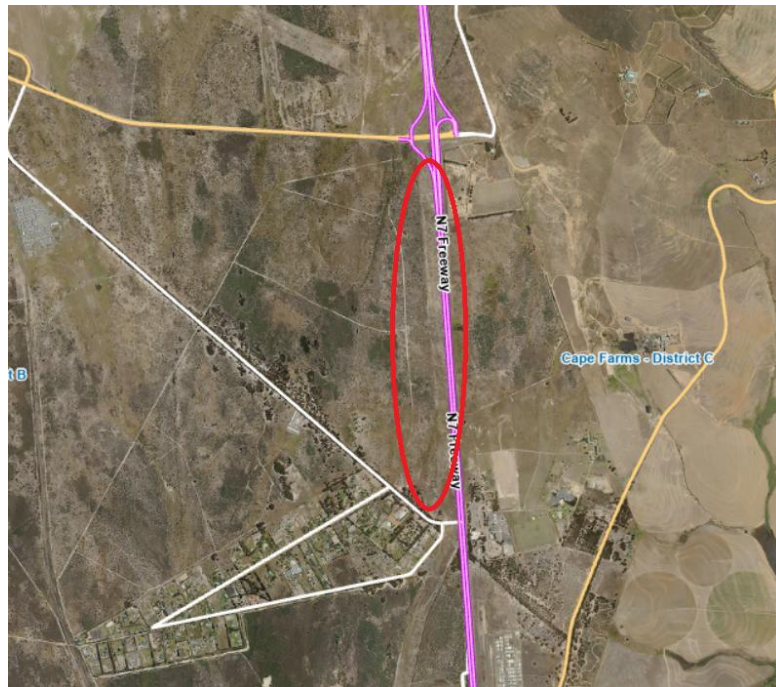


Figure 4: Proposed site alternative on Remainder CFM 141 that should be assessed.

- 1.3. It is noted that the required heritage submission in terms of Section 38 of the National Heritage Resources Act, No. 25 of 1999 (NHRA) has been concluded. Heritage Western Cape issued a Response to NID, dated 21 May 2025.
- 1.3.1. The proposed new weighbridge platform will have some impact on the remnants of the Van Schoorsdrift & Old Rygersdal Road Blue Gum trees. However, considering the holistic impact the construction of the N7 highway (including the diversions of both roads) has had on this section on the historic tree lane, the impact on the blue gum grove will be minimal and negligible.

Appendix F: I&AP Database:

- 1.4. Be advised that the Environmental Management Department (EMD) is the duly mandated City of Cape Town department that provides co-ordinated City comment on NEMA EIA applications on behalf of the City. As such all NEMA EIA related documents pertaining to this weighbridge project must be submitted to the EMD Blaauwberg district branch (For Attention: Ms Sonja Warnich-Stemmet; e-mail: Sonja.warnichstemmet@capetown.gov.za).
- 1.5. Please include both the Eskom (Nuclear Generation) and the National Nuclear Regulator (NNR) on the I & AP database (also refer to point 2 below in this regard).

2. Safety and Security Directorate: Disaster Risk Management Centre (DRMC)

- 2.1. The subject property is situated between the 5 – 16km Urgent Protective Action Planning Zone (UPZ) south-east sector of the Koeberg Nuclear Power Station (KNPS) as illustrated in Figure 5 below.

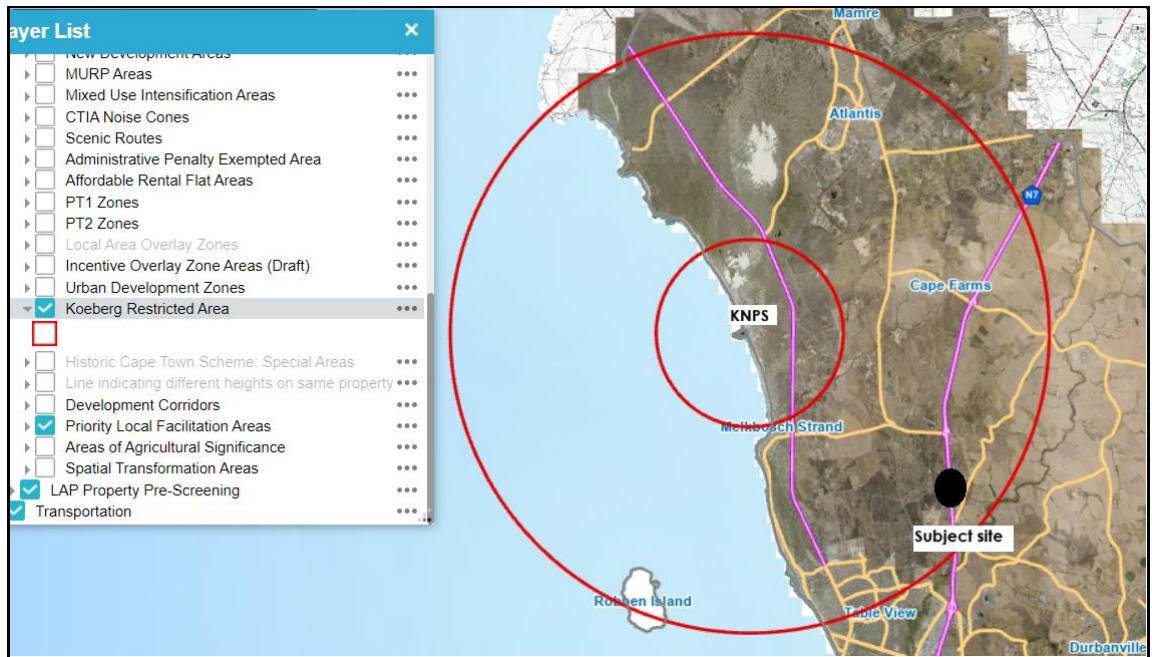


Figure 5: Location of the Subject Farm in relation to the Koeberg Nuclear Power Station 5km PAZ and 16km UPZ.

- 2.2. The Disaster Risk Management Centre (DRMC) is the custodian (on behalf of the City of Cape Town) and responsible for the execution of the Koeberg Nuclear Emergency Plan. In this regard, DRMC is tasked with the responsibility of ensuring that public safety arrangements are in place and that individual citizens are not endangered in the event of a nuclear emergency. Emphasis is placed on the population residing in the 0 to 16km area around the KNPS.
- 2.3. Procedure 7.2.38 (revision 2), dated 16/10/2015 of the City of Cape Town: Koeberg Nuclear Power Station Radiological Release Hazard Disaster Risk Management Plan (RRR) stipulates that the Traffic Evacuation Model (TEM) Testing Protocol shall be processed 'once the City's Department of Development Management received an application for land use changes or the Environmental Management Department (EMD) receives any documentation relating to the National Environmental Management Act'.
- 2.4. As such, the attached TEM form (refer to Annexure A) must be completed and attached to the draft BAR to test whether the increased population as a result of the proposed weigh bridge activity (both construction- and operational phase) can be evacuated within 16 hours.

3. City Health: Specialised Environmental Health Services: Air Quality Management Unit

The Air Quality Management Unit has the following comment.

Dust Management:

The measures indicated in the Draft EMPr are noted but require amendments, specifically considering the proximity to the Morningstar community. It is recommended that the air quality impacts of all potential dust generating activities, which may be caused during site preparation, construction activities and the operational phase of the project, be evaluated and addressed. In this regard:

- 3.1. Dust mitigation measures must ensure that dust nuisances are not experienced outside the fence line of the property and must comply with the provisions of the Dust Control

Regulations, No. R 827 dated 1 November 2013, as well as the City of Cape Town's Air Quality Management Bylaw, 2016, as amended.

- 3.1.1 The City's Air Quality Unit hereby requests that a Dust Management Plan (DMP), be provided to the City of Cape Town: Air Quality Management Unit for evaluation/comment and approval for implementation on site.
- 3.1.2. The DMP must be site-specific and identify all potential dust generating activities, include vehicle movement, product stockpiles/storage, etc. on site.
- 3.1.3. Mitigation measures must:
 - a. be area/activity specific.
 - b. be instituted for each of the potential dust emission sources.
 - c. be reapplied often and the frequency of applying dust suppressant measures (e.g. suppressant to roadways, wetting of access roads, etc.) must be indicated.
 - d. detail how fugitive dust emissions will be addressed, e.g. dust emissions dust from stockpiles, tipping, loading, etc. especially during times of strong winds, etc.
 - e. include the maintenance of the silo pumps and equipment related to the operation of the silos to ensure that no accidental.
 - f. address entrained dust carried into public roadways and how it will be managed and cleared (if necessary).
 - g. record any other relevant sources and related mitigation measures.
 - h. identify persons responsible for specific actions, e.g. site foreman or similar.
 - i. consider responsible use of non-potable and borehole water is advised. Alternative dust suppressant means should be investigated and applied where possible.
- 3.1.4. Furthermore, site screening methods are to be employed to minimize the potential transport of dust, to prevent a potential dust nuisance. Such dust screening measures should be installed on the site perimeter or at excavations or at areas of high dust generation. The materials used should be capable of minimising or reducing the quantity of dust being blown off site to below nuisance levels.
- 3.1.5. All access roads on site should be suitably hard surfaced to prevent dust emissions caused by vehicular movements on site.
 - a. Furthermore, suitable measures to prevent entrained dust from being deposited in the general roadway, i.e. N7 freeway (Trunk Road 11/1), must be investigated and implemented.
 - b. It may be necessary to include routine manual or mechanical sweeping/cleaning to remove sand deposits from the roadways used to access the site.
- 3.1.6. Consideration must be given and measures identified in the DMP to address periods of strong winds and the potential for sand/construction material to be blown off-site. These measures may include soil stabilisation by using straw or a bonding agent in addition to the use of non-potable water or ceasing activities on-site which may result in dust emissions.
- 3.1.7. Any areas which may be left exposed for long periods of time, such as the festive season builder's holiday, and may result in a windblown dust nuisance, must be suitably covered and all reasonable measures put in place to prevent nuisance conditions from being created while site activities stop during these periods.

General:

3.2. The applicant's attention is drawn to Section 4 of the City of Cape Town's Air Quality Management Bylaw, *Duty of Care*, which states:

"Any person who is wholly or partially responsible for causing air pollution or creating a risk of air pollution occurring must take all reasonable measures including the best practicable environmental option–

(a) to prevent any potential significant air pollution from occurring; and

(b) to mitigate and, as far as reasonably possible, remedy the environmental impacts and consequences of any air pollution that has occurred"

3.3. Regarding any noise emission from the operation at the site, or any part thereof, must comply with the Noise Control Regulations PN200/13 in that:

- i) The SANS 10103 Table 2 – the typical Rating Level for noise is adhered to.
- ii) No Noise Disturbance is caused in terms of the Provincial Noise Control Regulation PN200/13.
- iii) No Noise Nuisance is caused in terms of the Provincial Noise Control Regulation PN200/13.

4. Energy Directorate: Electricity Generation and Distribution

Section B, point 4.4: *Project detail* (pages 20 to 21 of the DBAR) refers: It is erroneously stipulated that *"electricity will be sourced from the municipality"*. The land in question does not fall within City of Cape Town's electrical distribution area. The matter must be referred to Eskom to confirm availability of electricity supply, as they are responsible for electrical distribution in this area.

5. Water & Sanitation Department: Water Demand Management Branch

The Water Demand Management Branch provided the following comment pertaining to water and sanitation infrastructure capacity.

The comment provides an overview of the existing water and sewer infrastructure near the development, as well as associated conditions that would apply. The information provided is based on City of Cape Town master plan model as well as comments from relevant branches of the department.

4.1. Water Reticulation:

There is a 110mm Ø water reticulation main situated north-west of the proposed relocation project site.

See attached Annexure B: Figure 1 for water reticulation system.

4.2. Sewer Reticulation:

There are no sewer reticulation pipelines or infrastructure under the control of the City of Cape Town's Reticulation Water Branch exist in the immediate vicinity of the project site.

See attached Annexure C: Figure 2 for sewer reticulation system

4.3. Bulk Water:

No bulk water pipelines or infrastructure under the control of the City of Cape Town's Bulk Water Branch exist in the immediate vicinity of the proposed project site.

4.4. Wastewater Treatment Works:

This proposed development is situated within the catchment of the Postdam Wastewater Treatment Works (WwTW). This plant is currently operating at capacity, upgrades are currently underway, and completion is estimated in 2028.

4.5. Water Demand Management Branch's Conclusion:

No water nor sewer demands have yet been provided. A detailed capacity analysis will be required once the actual demands are known (if any), to determine the impact of the proposed application on the water and sanitation infrastructure.

4.6. Water Demand Management Branch's Conditions:

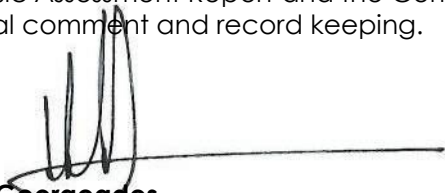
4.6.1. This comment from the Water Demand Management Branch is not a capacity letter. The applicant is required to submit an engineering report to water.info@capetown.gov.za and request a capacity report to confirm capacity in the municipal water and sewer reticulation systems.

4.6.2. Detailed drawings of water and sewer services must be submitted for approval, before the commencement of any work.

Disclaimer

1. **Information provided is based on the best available data. The infrastructure as-built information referred to and used in the analysis is based on the GIS asset records, while modelled pressures, flows, velocities, capacities and volumes are based on hydraulic models of the current land use and demands. Where appropriate, future land use and demands are considered. The flows and pressures provided are theoretical and not measured. All levels provided to be verified on site.**

The above comments from the City of Cape Town internal departments must be addressed in the final Basic Assessment Report and the Comments and Response Report and a copy provided to the City for final comment and record keeping.



D. Georgeades
Manager: Environmental and Heritage Management Branch
Environmental Management Department

ANNEXURE A

Form 2:

PROPOSED DEVELOPMENT REGISTRATION AND INFORMATION SHEET FOR THE DEPARTMENTS OF:

- Planning & Building Development Management Department (P8DM) (to be used in the analysis of the proposed development into the Development Management Scheme sec 158 of the City of Cape Town By-law 1 July 2015);
- Spatial Planning & Urban Design (SPUD) (to be used in the analysis of the proposed development into the Cape Town Spatial Development Framework and the District Plans); and
- Transport for Cape Town (Department of Modeling, TIA & Dev Planning) (to be used in the analysis of the project into the TEM).
- Environmental Resource Management (to be used in analysis of proposed development alternative into the National Management Resource Act, 108 of 1998)

<p>APPLICATION WITHIN THE FORMAL EMERGENCY PLANNING ZONE (EPZ) OF THE KOEBERG NUCLEAR POWER STATION [PAT NO:]</p> <p>The application is located:</p> <p> <input type="checkbox"/> 0 – 5km Radius <input type="checkbox"/> 5 – 16 km (UPZ NE Sector) <input type="checkbox"/> 5 – 16 km (UPZ SE Sector) <input type="checkbox"/> 5 – 16 km (UPZ E Sector) <input type="checkbox"/> 16 – 20 km (UPZ NE Sector) <input type="checkbox"/> 16 – 20 km (UPZ SE Sector) <input type="checkbox"/> 16 – 20 km (UPZ E Sector) </p> <p>Type of application:</p> <p>1. <input type="checkbox"/> A development application: Erf/Farm nr: Owned by: Type of development: X Coordinate: Y Coordinate:</p> <p>2. <input type="checkbox"/> An EIA application: Erf/Farm nr: DEA/ DEA& DP Ref No: Owned by: Description of development planned: With number of alternatives (1 form required for each alternative). Choose here Alternative 1, 2, 3 etc. <input type="checkbox"/> X Coordinate: Y Coordinate:</p>																																																									
<p>To consider the application with reference to the impact it may have on the implementation of the relevant policy documents of the City of Cape Town, please provide the following information:</p> <p>Land Use information as per documentation:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 12.5%;"></th> <th style="width: 12.5%;">A. No of new dwelling units/ residential units?</th> <th style="width: 12.5%;">B. Income group of residents? [High, medium (gap), low]</th> <th style="width: 12.5%;">C. No of sqm of GLA (Gross Leasable Area) to be developed?</th> <th style="width: 12.5%;">D. For Industrial, Office or Retail use?</th> <th style="width: 12.5%;">E. Any Community Facilities Plan?</th> <th style="width: 12.5%;">F. Other:</th> <th style="width: 12.5%;">G. No of construction workers?</th> <th style="width: 12.5%;">H. No of permanent workers?</th> </tr> </thead> <tbody> <tr> <td style="background-color: #cccccc;"></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>With regard to A, G and H above, please indicate the origin of the permanent and non-permanent population and workers?</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 12.5%;"></th> <th style="width: 12.5%;"></th> <th style="width: 12.5%;"></th> <th style="width: 12.5%;"></th> <th style="width: 12.5%;"></th> <th style="width: 12.5%;"></th> <th style="width: 12.5%;"></th> <th style="width: 12.5%;"></th> </tr> </thead> <tbody> <tr> <td style="background-color: #cccccc;">% of people from INSIDE PAZ 0-5km</td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> </tr> <tr> <td style="background-color: #cccccc;">% of people from INSIDE UPZ 5-16km</td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> </tr> <tr> <td style="background-color: #cccccc;">% of people from OUTSIDE UPZ 5-16km</td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> <td style="background-color: #cccccc;"></td> </tr> </tbody> </table> <p>Application Time: Cumulative Evacuation time:</p> <p>Above hours subject to road infrastructure availability YES NO Road name:</p> <p>Above hours subject to busses availability YES NO Total no. of busses:</p>									A. No of new dwelling units/ residential units?	B. Income group of residents? [High, medium (gap), low]	C. No of sqm of GLA (Gross Leasable Area) to be developed?	D. For Industrial, Office or Retail use?	E. Any Community Facilities Plan?	F. Other:	G. No of construction workers?	H. No of permanent workers?																		% of people from INSIDE PAZ 0-5km								% of people from INSIDE UPZ 5-16km								% of people from OUTSIDE UPZ 5-16km							
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Water: System Type

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0 500m
Scale 1:13307

Figure 1: Water reticulation system



Figure 2: Sanitation reticulation system: Note there is no sewer reticulation pipelines or infrastructure under the control of the City of Cape Town’s Reticulation Water Branch in the immediate vicinity of the project site