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Sharples Environmental Services

ATTENTION: Jessica Gossman

EMAIL TO: jessica@sesc.net

**FoBCA Comment re: Draft BAR for the Proposed Construction of the N7 Vissershok Weighbridge Located on Farm 153 Vissershok Outspan, Morning Star 25/141 and Morning Star RE/141 (C1038: Upgrading of TR11/1), CITY OF CAPE TOWN MUNICIPALITY, WESTERN CAPE PROVINCE (DEA&DP REFERENCE: 16/3/3/1/A1/41/3042/25 ).**

Good Day Jessica,

1. Please register the Friends of the Blaauwberg Conservation Area (FoBCA) as an I&AP.
2. Note that although our environmental and heritage commenting organisation is registered on the City of Cape Town's database to receive notifications from both Subcouncils 1 and 3, we did not receive any notification regarding this Draft BAR. The proposed footprint falls within Ward 23, in Subcouncil 1. We note that in Appendix F1 - the I&AP registry your contact is Roxanne Moses, she is in fact the Subcouncil 3 Manager.
3. Our environmental organization has been active in the local area since 2003, and it has been our understanding that there was a vision to connect the conservation areas in the Blaauwberg District with the conservation areas of the Tygerberg Hills in the Northern District. The only remaining **east - west key linking area** is this area to the south of Morningstar and the Van Schoorsdrif Conservation Areas. The "final" footprint of the proposed new weighbridge lies right in the middle of this bottle-neck of remaining vegetation. We therefore reject the proposed placement of the footprint at the northern end of the site. We would however support the southern most placement (Figure 2: Layout 3 (Option 5b) as proposed by the botanical specialist Nick Helm in his first report and assessment.
4. The most northern placement of the site will result in the south and western boundaries being directly adjacent to good quality veld. It is inevitable that the boundary areas adjacent to the weighbridge will degrade in time with the introduction of invasive grasses, herbaceous weeds and the like. The northern site is directly adjacent to the ESKOM servitude where 42 observations of twelve red listed species have been recorded on the iNaturalist platform.  
<https://www.inaturalist.org/observations?lat=-33.75352739076184&lng=18.54444280732423&>

[radius=0.19386919015013143&subview=map&threatened&view=species&iconic\\_taxa=Plant](radius=0.19386919015013143&subview=map&threatened&view=species&iconic_taxa=Plant)  
[ae](#) Again the southern most placement is favoured because the weighbridge boundaries will face poor quality veld, already highly disturbed.

5. The landowner of the site (the City of Cape Town) is required under law to remove invasive aliens or at least have a management plan in place for removal. A few years ago, Vula Environmental Services worked on the entire site removing all the aliens. This may have been mitigation from another development, as the veld quality was certainly better than poor at that stage. We are not privy to the details. Clearly at that time the entire site was considered worthy of alien clearing by the City. There was no follow-up or maintenance to remove resprouting aliens by the City of Cape Town and the site again became overgrown with alien species.
6. The botanical specialist Nick Helm recommends in his reports that the existing weighbridge site not be rehabilitated due to the cost and likely level of success, and we agree. He does also recommend that this money be used to remove alien vegetation in the surrounding areas where natural veld can still be rehabilitated. Could we get a firm commitment for the removal of alien species from a specific site/s and subsequent maintenance to avoid the matter raised under point 4.
7. Prior to the construction of the Van Schoorsdrif Interchange nearby in 2024 / 2025 a large number of Eucalyptus trees were felled. After the felling, tens of local woodcutters and their vehicles swarmed onto the site cutting and removing wood. The ensuing chaos on the site, right next to the N7, could be described as exactly the opposite of any well crafted and intended EMPr. Could we as the public get a reassurance that any Eucalyptus trees felled on the site will be removed under controlled means. Our primary concern is that the ESKOM servitude to the west, might be used to access felled material and good quality veld be destroyed in the process. The area under the ESKOM pylons, right next to the footprint, is filled with redlisted species and the veld quality is very good.
8. Have any large bird nests been observed in the Eucalyptus trees ?
9. Given the amount of pollution produced by large vehicles, in terms of tire wear and oil leaks, what is the final destination of rain water onsite? This is of concern because there is a shallow depression under the ESKOM powerlines where water collects in winter creating damp conditions that favour certain plants including *Lampranthus reptans* (Near Threatened).

**In conclusion**, the FoBCA wishes to be kept informed of further opportunities to comment, to be informed of the outcomes and to be provided with feedback regarding our comments.

Kind regards,