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reference SSD14/2/6/1/9/4/502_cemetery_Jamestown
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EnviroAfrica
P.O. Box 5367
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Attention: Vivienne Thomson
By email: admin@enviroafrica.co.za

Dear Vivienne

Pre-Application Basic Assessment Report for the Proposed New Public Cemetery and Memorial Park on the Remainder of Farm Louw's Bos 502, Jamestown, Stellenbosch (DEA&DP ref. no. 16/3/3/6/7/1/B4/45/1288/17)

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

For the Background Information Document (BID) for this application, only the alternative north of Annandale Road (Louw's Bos North) was put forward for consideration, whereas an alternative footprint south of Annandale Road (Louw's Bos South) has been included as an additional alternative for the Pre-Application Basic Assessment Report (BAR), both located on the same large municipal cadastre.

The Louw's Bos South proposed footprint consists of No Natural across its full extent according to the Western Cape Biodiversity Spatial Plan (WCBSP) and no freshwater features are mapped within the footprint. As stated in the BID, Louw's Bos North is classified as Critical Biodiversity Area (CBA) 2 in the far eastern section, with patches of CBA 1 and Ecological Support Area (ESA) 2, although the majority of the property is classified as No Natural. There is a watercourse mapped in the centre of the site with associated ESA 2 and a small wetland in north according to the WCBSP. The vegetation type that would have occurred across both alternative sites is Swartland Granite Renosterveld, listed as Critically Endangered.

A botanical constraints analysis has been undertaken for Louw's Bos South which provides a detailed description of the vegetation across the site and is described as secondary vegetation that has established on the site after lying fallow following ceasing of cultivation. The species present are weedy, pioneer species and the vegetation cannot be considered as representative of Swartland Granite Renosterveld.

Google Earth imagery further confirms the description provided in the botanical constraints analysis with clear evidence of cultivation across the entire site within the past 10 years with the eastern section still actively cultivated.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Prof Denver Hendricks (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Ms Marguerite Bond-Smith, Mr Mervyn Burton, Dr Colin Johnson, Prof Aubrey Redlinghuis, Mr Paul Slack

The conclusion of the botanical constraints analysis was that the vegetation on site is not of conservation value and therefore there are no constraints to development. CapeNature agrees with the findings of the botanical constraints analysis.

Louw's Bos North was not included in the botanical constraints analysis however it was part of the site screening which informed the BID. While a large proportion of this area did not present constraints from a terrestrial biodiversity perspective, there were patches of natural vegetation that needed to be avoided. Our comments on the BID should be referred to for more detail.

A preliminary freshwater assessment was undertaken for both Louw's Bos North and Louw's Bos South. The wetland delineation verified the presence of the wetland mapped on the WCBSP in the central section of Louw's Bos North, which is classified as an unchannelled valley bottom wetland, with another unchannelled valley bottom wetland in the south eastern corner and a channelled valley bottom wetland in the south western corner. For Louw's Bos South, there is a channelled valley bottom wetland that encroaches slightly on to the site in the north eastern corner with artificial farm dams surrounding the property. The recommendation is that the wetlands and a 15 m buffer should be implemented as constraints for the proposed cemetery and memorial park.

The proposed preferred alternative for the development is Louw's Bos South and a layout plan has only been compiled for this alternative. The layout design is currently only conceptual, however it does appear that the proposed development does avoid the wetland and the 15 m buffer, which only encroaches slightly on to the site, however this must be confirmed.

As biodiversity constraints have been taken into consideration we do not have any objection to the preferred development alternative and do not have further comments on the layout itself. We do however wish to propose that the density of burials are maximised as far as possible due to the high demand for land for alternative land uses in addition to the existing demand for cemetery space, as is motivated for in this application.

In conclusion, CapeNature does not object to the preferred development alternative. While both Louw's Bos North and Louw's Bos South do present opportunities for the proposed development, we agree that the preferred alternative will not have any impacts on biodiversity as the site is transformed and will not impact on any natural freshwater features. The environmental management plan (EMP) must however be strictly implemented and we recommend that more detailed controls and measures are required for the operational phase.

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

Yours sincerely



Rhett Smart
For: Manager (Scientific Services)