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Bodorp, George, 6529**website** [www.capenature.co.za](http://www.capenature.co.za)**enquiries** Megan Simons**telephone** +27 87 087 3060 **fax** +27 44 802 5313**email** [msimons@capenature.co.za](mailto:msimons@capenature.co.za)**reference** LS14/2/6/1/7/4\_THEE\_160mm pipeline\_Tesselaarsdal**date** 28 August 2020

Guillaume Nel: Environmental Consultants,  
P.O. Box 2632,  
Paarl,  
7620

Attention: Mr Divan Opperman

Dear Mr Divan Opperman ([divan@gnec.co.za](mailto:divan@gnec.co.za))

**PROPOSED DEVELOPMENT OF 160MM upvc BULK WATER CONVEYANCE  
PIPELINE FROM TESSELAARADAL TO BETHOESKLOOF,  
THEEWATERSKLOOF MUNICIPALITY, WESTERN CAPE.**

**DEA&DP reference #: 16/3/3/6/7/1/E5/1088/20**

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CapeNature would like to thank you for the opportunity to review the proposed development, which requires the installation of 160mm uPVC bulk water conveyance pipeline from Tesselaarsdal to Bethoeskloof near Caledon in the Theewaterskloof Municipality. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature would like to make the following comments.

### **Desktop Information**

According to the Western Cape Biodiversity Spatial Plan (WCBSP 2017)<sup>1</sup> the development is proposed in a climate change adaptation corridor and in areas classified as Critical Biodiversity Areas (CBA 1: Aquatic, Wetland, Terrestrial and CBA 2: Terrestrial), Ecological Support Areas (ESA 1: Terrestrial), and perennial and non-

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

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perennial rivers. The vegetation units present at the proposed area is classified as **Critically Endangered** Western Rûens Shale Renosterveld as listed in the 2011 NEM:BA threatened ecosystems gazette<sup>2</sup> and in the draft ecosystem threat listings for the updated National Biodiversity Assessment (2018)<sup>3</sup>.

## Freshwater Assessment

From the freshwater assessment, the images taken at the five crossing points, it appears that the soil is highly eroded. This is seen, from the images taken, in the general area where crossing points one, two and five are located. We agree with the report that the watercourses and wetland(s) will be impacted in the area where the water pipeline is proposed to be installed. The report does minimize the importance of the hydrological function that remains, especially in the valley bottom wetland. In the DWS Risk Assessment Matrix, from pages 61-68, the last column on Mitigation Measures to be implemented the text highlighted in red states: "*Mitigation Measures highlighted in Red Text are considered mandatory for manual adjustments to **LOW-Risk Class** (where applicable).*" However, none of the mitigation measures are highlighted and CapeNature considers all of them as mandatory. The low risk results for all construction phases, from Table 12 of the report, does not highlight the current hydrological patterns.

## Botanical Assessment

The vegetation on the proposed route (i.e. Western Rûens Shale Renosterveld) has been ploughed in the past. Renosterveld has a very low restoration potential once the soil has been ploughed and can be considered transformed. The area that supports intact Overberg Sandstone Fynbos is of conservation value (as indicated as waypoints 001 and 003 on page 21 of the report). CapeNature is in agreement with the report that no disturbance should take place in the western side, as it is still undisturbed, compared to the eastern side of the road which is more disturbed. CapeNature agrees with the Preferred Alternative being used as the road reserve, which extends in an eastern direction is mostly disturbed. Furthermore, the disturbance footprint should be minimized and the proposed section that passes through the intact vegetation should be within the road, if not directly adjacent to the road. The significance impact of vegetation and species loss is low without mitigation and very low with mitigation. Therefore, CapeNature is in accordance with the proposed mitigation measures. Fieldwork was completed in May (i.e. autumn season) and annual and geophyte

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<sup>2</sup> National Environmental Management: Biodiversity Act (10/2004): National list of ecosystems that are threatened and in need of protection. 2011.

<sup>3</sup> 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.  
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species cannot be identified during this period, as they flower in spring season. The vegetation mentioned as having conservation value could contain dormant threatened species and therefore the mitigation measures proposed should be followed in order for these species to survive the construction phase. CapeNature is in agreement with the findings and recommendations from the botanical assessment.

In conclusion, CapeNature would require further clarity on the proposed development and the two alternative alignments, especially the reason for the split between the two routes in the eastern section, as it is uncertain if two water pipelines, in this section, would be required. CapeNature would like to highlight that the mitigation measures proposed should be implemented. Thus, intact Overberg Sandstone Fynbos, especially on the western side should be avoided. The topsoil should be reinstated to its original position thereby ensuring proper topsoil management. 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 'Megan Simons', with a stylized flourish extending to the right.

**Megan Simons**  
**For: Manager (Landscape Conservation Intelligence)**