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reference SSD14/2/6/1/9/3/915_Cumberland_Industrial_Simondium
date 19 July 2019

Renier Kapp
GNEC
P O Box 2632
Paarl
7620

By email: renier@gnec.co.za

Dear Renier,

RE: CapeNature comment on the proposed rezoning, subdivision and development of a mixed use development on Farm Cumberland no. 915, Simondium, Post Application Draft Basic Assessment Report

DEA&DP Ref: 16/3/3/1/B3/28/1027/19

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

1. CapeNature's comments of 25 November 2018 submitted in response to the Pre-application DBAR have been correctly reflected in the report. The comprehensive comments and responses table addresses issues raised including the need for a Freshwater Specialist Assessment.
2. The Freshwater Specialist Assessment subsequently undertaken by Scientific Aquatic Services CC, has provided a thorough assessment of the existing conditions and possible impacts that may occur as a result of the proposed development. The crux of the issue, as concluded by the freshwater specialist, is that since the proposed development within the study area is located outside of the 100m Zone of Regulation in accordance with the National Water Act, 1998 (Act 36 of 1998) (NWA) of the unnamed tributary, the proposed development activities within the study area do not pose any legislative or freshwater conservation constraints and a Water Use Authorisation for the activities within the study area is not required. However the freshwater specialist does go on to note that since the treatment plant is located within 100m of the tributary, and treated effluent and stormwater from the proposed development will be used for irrigation with any overflow discharged directly into the system, authorisation from DEA&DP for the above-listed activities and a Water Use Authorisation from DWS will be required. The recommended mitigation measures as provided in the Freshwater Report are strongly supported, particularly the recommendation that all stormwater management be undertaken utilising Sustainable Urban Drainage systems (SuDS) and not via trenched pipes. This would entail the creation of earth swales (vegetated with indigenous freshwater vegetation) to discharge the stormwater and treated effluent into the unnamed tributary, rather than it being piped. The freshwater specialist stresses that

if this preferred control measure is implemented, the construction of these stormwater swales is considered of low risk significance.

3. Potential botanical impacts have been addressed via a botanical specialist assessment and site survey which concludes that the site does not support any remaining natural vegetation, does not play an important role in terms of ecological corridors, and has a very low restoration potential. This is accepted and the proposed development is thus not opposed in terms of potential negative botanical impacts.
4. In conclusion, the proposed development and associated proposed rezoning and subdivision are not opposed, provided the recommendations as provided in the freshwater report are adhered to.

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

Yours sincerely



Philippa Huntly For: Manager (Scientific Services)