



**Western Cape
Government**

Department of Environmental Affairs and
Development Planning

BASIC ASSESSMENT REPORT

THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

APRIL 2024



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APRIL 2024

(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

(This must Include an overview of the project including the Farm name/Portion/Erf number)

Zutari (Pty) Ltd (hereafter referred to as Zutari) has been appointed by the City of Cape Town (CoCT) to undertake an Environmental Authorisation (EA) application process for the proposed extension of the existing Klip Road Cemetery in Grassy Park. The proposed extension is to take place on

- Erf 75570, located along Klip Road;
- a portion of Remainder Erf 75569 located along Victoria Road;
- a portion of Erf 75562 and
- a portion of Erf 75567

CoCT is currently experiencing a shortage of burial space. To address this, the Recreation and Parks Department has identified land parcels suitable for cemetery development. The project involves extending the existing Klip Road Cemetery in Grassy Park, Cape Town.

The expansion will encompass approximately 49 633 square metres (5 hectares) and will include the installation of standard cemetery infrastructure, which comprises:

- Designated burial blocks
- Perimeter fencing

The extension exceeds 2 500m² and an application for environmental authorisation is required since it involves an activity listed in terms of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended by GNR 326 of 2017), and the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA).

IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.
2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".

3. *Submission of documentation, reports and other correspondence:*

The Department has adopted a digital format for corresponding with proponents/applicants or the general public. If there is a conflict between this approach and any provision in the legislation, then the provisions in the legislation prevail. If there is any uncertainty about the requirements or arrangements, the relevant Competent Authority must be consulted.

The Directorate: Development Management has created generic e-mail addresses for the respective Regions, to centralise their administration. Please make use of the relevant general administration e-mail address below when submitting documents:

DEADPEIAAdmin@westerncape.gov.za

Directorate: Development Management (Region 1):
City of Cape Town; West Coast District Municipal area;
Cape Winelands District Municipal area and Overberg District Municipal area.

DEADPEIAAdmin.George@westerncape.gov.za

Directorate: Development Management (Region 3):
Garden Route District Municipal area and Central Karoo District Municipal area

General queries must be submitted via the general administration e-mail for EIA related queries. Where a case-officer of DEA&DP has been assigned, correspondence may be directed to such official and copied to the relevant general administration e-mail for record purposes.

All correspondence, comments, requests and decisions in terms of applications, will be issued to either the applicant/requester in a digital format via email, with digital signatures, and copied to the Environmental Assessment Practitioner ("EAP") (where applicable).

4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.
5. All applicable sections of this BAR must be completed.
6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.
7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at <http://www.westerncape.gov.za> to check for the latest version of this BAR.
8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations

when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.
10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.
11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.
12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.
13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.
14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link <https://screening.environment.gov.za/screeningtool> to generate the Screening Tool Report. The screening tool report must be attached to this BAR.
15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA'), the submission of the Report must also be made as follows, for-
Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licensing Authority or this Department's Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

DEPARTMENTAL DETAILS	
CAPE TOWN OFFICE: DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1) (City of Cape Town, West Coast District, Cape Winelands District & Overberg District)	GEORGE REGIONAL OFFICE: DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3) (Central Karoo District & Garden Route District)
The completed Form must be sent via electronic mail to: DEADPEIAAdmin@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 1) at: E-mail: DEADPEIAAdmin@westerncape.gov.za Tel: (021) 483-5829 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000	The completed Form must be sent via electronic mail to: DEADPEIAAdmin.George@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 3) at: E-mail: DEADPEIAAdmin.George@westerncape.gov.za Tel: (044) 814-2006 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development must be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): ◦ Watercourses / Rivers / Wetlands ◦ Flood lines (i.e., 1:100 year, 1:50 year and 1:10 year where applicable); ◦ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"); ◦ Ridges;

	○ Cultural and historical features/landscapes; ○ Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as Appendix C. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as Appendix D.
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as Appendix A3.

ACRONYMS

DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme
HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment
NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government

ATTACHMENTS

Note: The Appendices must be attached to the BAR as per the list below. Please use a ✓ (tick) or a x (cross) to indicate whether the Appendix is attached to the BAR.

The following checklist of attachments must be completed.

APPENDIX			✓ (Tick) or x (cross)
Appendix A:	Maps		
	Appendix A1:	Locality Map	✓
	Appendix A2:	Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning	N/A
	Appendix A3:	Map with the GPS co-ordinates for linear activities	N/A
Appendix B:	Appendix B1:	Site development plan(s)	x
	Appendix B2	A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;	✓
Appendix C:	Photographs		✓
Appendix D:	Biodiversity overlay map		✓
Appendix E:	Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.		
	Appendix E1:	Final comment/ROD from HWC	✓
	Appendix E2:	Copy of comment from Cape Nature	x
	Appendix E3:	Final Comment from the DWS	✓
	Appendix E4:	Comment from the DEA: Oceans and Coast	x
	Appendix E5:	Comment from the DAFF	x
	Appendix E6:	Comment from WCG: Transport and Public Works	x
	Appendix E7:	Comment from WCG: DoA	x
	Appendix E8:	Comment from WCG: DHS	x
	Appendix E9:	Comment from WCG: DoH	x
	Appendix E10:	Comment from DEA&DP: Pollution Management	x
	Appendix E11:	Comment from DEA&DP: Waste Management	x
	Appendix E12:	Comment from DEA&DP: Biodiversity	x
	Appendix E13:	Comment from DEA&DP: Air Quality	x
	Appendix E14:	Comment from DEA&DP: Coastal Management	x
	Appendix E15:	Comment from the local authority	x
	Appendix E16:	Confirmation of all services (water, electricity, sewage, solid waste management)	x

	Appendix E17:	Comment from the District Municipality	x
	Appendix E18:	Copy of an exemption notice	N/A
	Appendix E19	Pre-approval for the reclamation of land	N/A
	Appendix E20:	Proof of agreement/TOR of the specialist studies conducted.	x
	Appendix E21:	Proof of land use rights	x
	Appendix E22:	Proof of public participation agreement for linear activities	N/A
Appendix F:	Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.		✓
Appendix G:	Specialist Report(s):		
	Appendix G1	Aquatic Compliance Statement	✓
	Appendix G2	Terrestrial Compliance Statement	✓
	Appendix G3	Landscape and Visual Impact Assessment	✓
	Appendix G4	Agricultural Compliance Statement	✓
	Appendix G5	Groundwater Impact Assessment	✓
	Appendix G6	Traffic Impact Assessment	✓
	Appendix G7	Heritage and Palaeontological Screening	✓
	Appendix G8	Socio-Economic Impact Assessment	✓
	Appendix G9	Stormwater Management Plan	✓
Appendix H:	EMPr		✓
Appendix I:	Screening tool report		✓
Appendix J:	The impact and risk assessment for each alternative		x
Appendix K:	Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline		✓
Appendix L:	Proposed Civil Infrastructure Layout		✓
Appendix.....	Any other attachments must be included as subsequent appendices		

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	CAPE TOWN OFFICE: REGION 1		GEORGE OFFICE: REGION 3
	(City of Cape Town, West Coast District)	(Cape Winelands District & Overberg District)	(Central Karoo District & Garden Route District)
Duplicate this section where there is more than one Proponent Name of Applicant/Proponent: Name of contact person for Applicant/Proponent (if other): Company/ Trading name/State Department/Organ of State: Company Registration Number: Postal address: Telephone: E-mail:	City of Cape Town		
	Siraaj Slamang		
	City of Cape Town		
	Not Applicable		
	Civic Centre, 12 Hertzog Boulevard		
	Cape Town		Postal code: 8001
	+27(0) 21 400 3281		Cell: +27(0) 72 548 7753
	Siraaj.slamang@capetown.gov.za		Fax: N/A
	Company of EAP: Zutari (Pty) Ltd		
	EAP name: Xanté Eberhardt		
Postal address: PO Box 494			
Cape Town		Postal code:	
(021) 526 9400		Cell: 083 292 3766	
Xante.Eberhardt@zutari.com		Fax: N/A	
Qualifications: BSc (Hons) Environmental Sciences and Management. BSc Environmental and Biological Sciences.			
EAP registration no: 2021/3103			
Duplicate this section where there is more than one landowner Name of landowner: Name of contact person for landowner (if other): Postal address: Telephone: E-mail:	City of Cape Town		
	Siraaj Slamang		
	Civic Centre, 12 Hertzog Boulevard		
	Cape Town		Postal code: 8001
	+27(0) 21 400 3281		Cell: +27(0) 72 548 7753
	Siraaj.slamang@capetown.gov.za		Fax: N/A
	Name of Person in control of the land: Same as proponent		
	Name of contact person for person in control of the land:		
Postal address:			
		Postal code:	
()		Cell:	
		Fax: ()	
Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall: Contact person: Postal address: Telephone: E-mail:	City of Cape Town Metropolitan Municipality		
	Maurietta Stewart (Head: Environmental and Heritage Management Branch) (Central: Cape Town to Bellville / Kuils River)		
	Civic Centre, 12 Hertzog Boulevard		
	Cape Town		Postal code: 8001
	+27(0) 21 444 1761		Cell: N/A
	maurietta.stewart@capetown.gov.za		Fax: N/A

SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INCLUDED IN THE APPLICATION FORM

1.	Is the proposed development (please tick):	New	Expansion	✓
2.	Is the proposed site(s) a brownfield or greenfield site? Please explain.			
The proposed Klip Road cemetery will occur on land that is not entirely greenfield. The area consists of degraded, manicured grass rather than indigenous grassland, along with hard surfaces like pavements, non-natural treelines, and the already approved Klip Road cemetery. No natural vegetation remains on the site as seen in Figure 1. Furthermore, the property is zoned as Public Open Space 2 under the City of Cape Town Zoning Scheme Regulations. This zoning designation permits uses such as environmental facilities, tourist amenities, utility services, cemeteries, and rooftop base telecommunication stations.				
				
Figure 1: Aerial view of the proposed expansion areas with clear evidence of no-natural vegetation				
3.	For Linear activities or developments (Not Applicable – project is not a linear development)			
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:			
3.2.	Development footprint of the proposed development for all alternatives:			—m ²
3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives:			
3.4.	Indicate how access to the proposed routes will be obtained for all alternatives:			
3.5.	SG-Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives			
3.6.	Starting point co-ordinates for all alternatives			
	Latitude (S)	°	'	''
	Longitude (E)	°	'	''

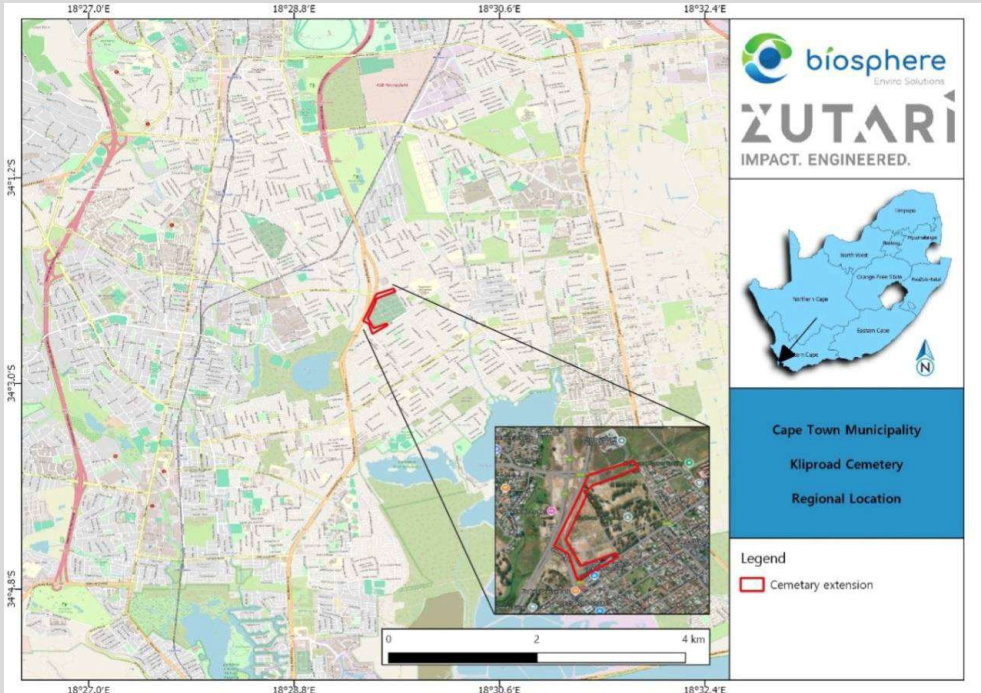
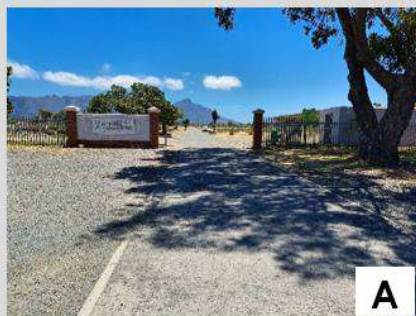
Middle-point co-ordinates for all alternatives			
Latitude (S)	°	'	''
Longitude (E)	°	'	''
End point co-ordinates for all alternatives			
Latitude (S)	°	'	''
Longitude (E)	°	'	''
Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.			
4.	Other developments		
4.1.	Property size(s) of all proposed site(s):	49 633 m ²	
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):	186 674 m ² (Extent of the existing Klip Road Cemetery)	
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	49 633 m ²	
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).		
The City of Cape Town (CoCT) is facing a shortage of suitable and well-located burial space across the city. The Recreation and Parks department is responsible for the provision of burial space within the CoCT. The department has identified certain parcels of land across the City which could potentially be developed into a Cemetery. The Klip Road cemetery is one of the identified cemeteries to be expanded to meet the City's demands for burial space. The expansion of the cemetery is proposed in response to the need for more cemeteries in Cape Town, which has limited appropriate land available for such utilisation. The proposed expansion of the cemetery will cover an area of approximately 49 633 m² (5 ha) and will comprise of typical cemetery infrastructures such as, inter alia: • Burial blocks • Fencing The cemetery extension might use some of the already existing infrastructure for the operational Klip Road cemetery.			
 Figure 2. General locality of the proposed expansion footprint			
4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.		
As per the Traffic Impact Assessment (TIA) conducted, there are three (3) access points to the current cemetery, one (1) access point is closed. It is proposed in the TIA that existing access routes to be maintained, and a new vehicular access route to be opened on Klip Road to extension 1. The three access locations are shown in Figure 3 and photographs are shown below.			



Figure 3: Access to the existing cemetery



Access 1 to cemetery



Access 2 to cemetery



Closed access 3 Gate to cemetery



D



E

Access to extension property

Figure 4. Photographs of access points to the existing cemetery (A – C) and extension property (D)

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	C	0	1	6	0	0	0	7	0	0	0	7	5	5	6	2	0	0	0	0	0
		C	0	1	6	0	0	0	7	0	0	0	7	5	5	6	7	0	0	0	0	0
		C	0	1	6	0	0	0	7	0	0	0	7	5	5	6	9	0	0	0	0	0
		C	0	1	6	0	0	0	7	0	0	0	7	5	5	7	0	0	0	0	0	0
4.7.	Coordinates of the proposed site(s) for all alternatives:																					
	Center Point:																					
	Latitude (S)							34°				02'				26.75"						
	Longitude (E)							18°				29'				25.91"						

SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

1. Exemption applied for in terms of the NEMA and the NEMA EIA Regulations

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18.	YES	NO
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2. Is the following legislation applicable to the proposed activity or development.

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	YES	NO
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	YES	NO
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	NO
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	YES	NO
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	YES	NO
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	YES	NO
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	YES	NO
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	YES	NO

3. Other legislation

List any other legislation that is applicable to the proposed activity or development.	
National Health Act, 2003) (Act No. 61 of 2003)	According to the regulations relating to the management of human remains (Regulations 363 of 2013) promulgated under the National Health Act (Act 16 of 2003): No land or site are to be used for the purpose of burial site unless environmental authorisation has been granted in terms of the NEMA Act (Act 107 of 1998). Chapter 5 of the regulations states that all burial sites must comply with the following environmental requirements: • Be located outside the 100-year flood line. • Be located at least 350m from ground water sources used for drinking purposes and at least 500m from the nearest habitable building. • For a preferred burial site with a soil of sand-clay mix of low porosity and a small and fine grain texture, the water table should be at least 2.5m deep to allow for traditional grave depth of six feet (1.8 metres). • For areas with higher water tables, the local government may determine a reasonable depth with additional walling recommendations to protect underground water; and • The covering soil shall not be less than 1 metre, should two bodies be buried in the same grave, 300mm of soil shall be maintained between the coffins. The proposed Klip Road cemetery expansion complies with the National Health Regulations relating to the management of human remains. • Site is located outside the 100-year flood line. • The risk of groundwater contamination can be significantly reduced with the appropriate mitigation measures. • There is a shallow water table under the proposed site.
Municipal Systems Act (Act 32 of 2003)	This act requires municipalities to regulate land use through zoning and integrated development plans (IDPs). Development must align with the municipal Spatial Development Framework (SDF). The proposed cemetery falls within the consent use of the current zoning of - Erf 75570; - a portion of Remainder Erf 75569; - a portion of Erf 75562 and - a portion of Erf 75567
Spatial Planning and Land Use Management Act, 2013 (Act No. 16 of 2013)	Spatial Planning and Land Use Management Act (Act No. 16 of, 2013) (SPLUMA) is a key piece of legislation in South Africa that regulates spatial planning and land use. The Act provides a framework for municipalities to manage land use, zoning,

	and development applications, ensuring that spatial planning aligns with national and local goals. A cemetery expansion can align with the principles of SPLUMA (Spatial Planning and Land Use Management Act) as follows: - Spatial Justice: The expansion would ensure that all communities have fair access to cemetery services, as well as create the required space as the cemetery as reached capacity. - Spatial Sustainability: The expansion should be planned with long-term environmental sustainability in mind. The expansion is to be located on land already designated for a cemetery and will not impact on the natural environment. - Efficiency: The expansion is to occur on land already designated for a cemetery thus ensuring its design will incorporate well in terms of space usage and infrastructure. Furthermore, it will be located within an acceptable distance of the communities it serves. - Spatial Resilience: The expansion is located in an area that would be able to handle environmental changes, as seen with the current Hout Bay Cemetery. The expansion would not hinder any planning for future growth in terms of its surrounding environment or shifts in community needs. - Good Administration: The expansion would follow transparent, accountable, and well-organized planning and approval processes.
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4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.	
Western Cape Spatial Development Framework, 2014	The Western Cape Spatial Development Framework (WCSDf) is a strategic planning document that guides spatial development in the Western Cape province of South Africa. It aligns land use, infrastructure development, and resource management with the province's development goals, focusing on sustainability, equity, and efficiency. Implication: While the WCSDf does not explicitly mention cemeteries, it provides guidance on appropriate land use planning, including the siting of social infrastructure such as cemeteries. For cemetery expansions, the WCSDf encourages decisions that consider land availability, proximity to existing urban nodes, accessibility, and environmental sensitivity. Aligning the Klip Road cemetery expansion with the spatial planning principles of the WCSDf ensures that the project supports broader provincial goals of efficient land use, sustainable development, and equitable service delivery.
Western Cape Integrated Development Plan 2022/2027	The Western Cape Integrated Development Plan (IDP) 2022-2027 outlines the province's development priorities and actions for the next five years. Implication: For cemetery expansion, the IDP provides guidance on land use that aligns with the province's spatial and environmental goals. The expansion must consider proximity to urban areas, environmental protection, equitable access to services, and integration with existing infrastructure. Furthermore, the expansion would assist in catering to an increasing urban density and demand for burial space.
City of Cape Town Cemeteries, Crematoria, and Funeral Undertakers By-law, 2011	The City of Cape Town's Cemeteries, Crematoria, and Funeral Undertakers By-law, 2011 governs the administration and development of cemeteries and crematoria within the city. It appoints a responsible official to manage each cemetery and its operations. The by-law also establishes forums that bring together community members, city officials, and councillors to discuss cemetery-related matters. Additionally, the city is empowered to create guidelines and policies for the operation of these facilities. The by-law replaces the previous Cape Metropolitan Council's Cemeteries and Crematoria By-law of 2000. Implication: Any expansion must adhere to the by-law's regulations, which include securing the required zoning and land use approvals. A designated official will be responsible for overseeing the site to ensure proper management and compliance with health and safety standards. The by-law also mandates

	community consultation through liaison forums, where input from residents, city officials, and councillors will be considered in the planning. Additionally, specific guidelines for cemetery development may need to be followed to ensure the facility meets operational standards. The expansion will be subject to the current by-law, replacing any previous regulations, ensuring the development aligns with the city's updated planning framework. As such, thorough planning, approval processes, and community involvement are essential for a successful expansion.
City of Cape Town MSDF	The City of Cape Town's Municipal Spatial Development Framework (MSDF) 2023 - 2028 outlines the city's priorities for sustainable development, climate resilience, and urban growth. While the plan doesn't specifically address cemetery expansions, it highlights the importance of spatial planning, equitable service distribution, and community engagement. Cemetery development should align with the city's spatial framework, ensuring accessibility and integration with existing infrastructure. Implication: The spatial strategy that a cemetery expansion meets is one of spatial justice and spatial sustainability. Expanding cemeteries in strategic locations ensures equitable access to burial sites across different communities, including underserved or rural areas. It also supports the principle of sustainability by considering future urban growth, environmental protection, and the efficient use of available land. This alignment with the city's spatial planning goals ensures that cemetery development is both beneficial to the community and consistent with long-term planning objectives.
City of Cape Town Integrated Development Plan (2022-2027)	The City of Cape Town's Integrated Development Plan (IDP) for 2022–2027 outlines the city's strategic priorities, objectives, and strategies across various sectors, including social development, environmental sustainability, economic development, and community participation. While it doesn't specifically address cemetery expansions, its broader goals and principles are relevant to ensuring that such developments contribute to the overall well-being and sustainability of the city. Implication: The cemetery expansion should align with the IDP's goals for equitable service delivery by ensuring accessibility for all residents, regardless of their location or socio-economic status. Also, environmental considerations, such as sustainable landscaping and water management, should be integrated to align with the city's sustainability objectives outlined in the IDP. The expansion should also consider any potential for local economic benefits, such as job creation during construction or maintenance, and should prioritise community engagement throughout the planning and development process.

5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.	
Western Cape Biodiversity Spatial Plan and Guidelines (2023)	The WCBSP was considered as part of this EIA, to determine any biodiversity priority areas located within the development site.
Guideline for Public Participation (2013)	The PPP for this process is based on this Guideline and also includes any updated regulations.
Guideline on Need & Desirability (2013)	Need & Desirability refers to the temporal and spatial need of an area for a specific development. This Guideline was used to define the requirements and implications of Need & Desirability.
Guideline for Environmental Management Plans (2005)	An EMPr has been included with this Basic Assessment to provide practical and implementable actions to ensure that the development maintains sustainability and minimise impacts through all its phases. The document is drafted as per the Guidelines and requirements of NEMA.
Guideline on Alternatives (March 2013)	The provisions of the Guidelines were implemented in the Basic Assessment, through the identification and assessment of feasible and reasonable alternatives to the proposed activity, with a focus on impact minimisation.

6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form
Taking into consideration the protocols, promulgated on the 09th of May 2020, the following is a summary of specialist studies/ compliance statements that were undertaken for the proposed development: Compliance Statements for the following: • Agricultural Compliance Statement • Terrestrial Biodiversity Compliance Statement • Aquatic Compliance Statement • Traffic Impact Statement Specialist studies: • Groundwater Impact Assessment • Geotechnical Investigation • Socio-Economic Impact Assessment • Landscape/Visual Assessment • Heritage Impact Assessment

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 1	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity 44	The expansion of cemeteries by 2 500 square metres or more.	The proposal is for the expansion of the Klip Road cemetery onto several surrounding ervens, covering approximately 49 633 m ² (5 hectares).
Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3	Describe the portion of the proposed development to which the applicable listed activity relates.
15	Activity 15 – The <u>transformation of land bigger than 1000 square metres</u> in size, to residential, retail, commercial, industrial or institutional use, <u>where, such land was zoned open space</u>, conservation or had an equivalent zoning, on or after 02 August 2010. i. Western Cape i Outside urban areas, or ii. Inside urban areas: (aa) <u>Areas zoned for conservation use or equivalent zoning, on or after 02 August 2010;</u> (bb) A protected area identified in terms of NEMPAA, excluding conservancies; or (cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act as adopted by the competent authority	The extension is proposed on site that is approximately 49 633 square meters. According to available data from the CCT Map Viewer website, the properties under consideration is zoned Public Open Space 2. The proposed properties are currently degraded with no natural vegetation found on site.
Note: • The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted. • Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.		

List the applicable waste management listed activities in terms of the NEM:WA

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Category A	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A	N/A	N/A

List the applicable listed activities in terms of the NEM:AQA

Activity No(s):	Provide the relevant Listed Activity(ies)	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A	N/A	N/A

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative. The proposed expansion of the cemetery will cover an area of approximately 49 633m² (5 hectares) and comprise of typical cemetery infrastructures such as, <i>inter alia</i>: • Burial blocks • Internal roads to be used as pathways for pedestrians and for vehicle access, if required. • Parking provided by the existing parking area and new parking area to be allocated on the extension site. • New guard house with controlled security access • Church • Ablution facilities • Stormwater infrastructure • Fencing The proposed electricity, sewer, and water infrastructure will be connected to the existing municipal network. Vehicular access to the extended cemetery will be from Klip Road. Figure 5. Preliminary layout of the proposed Klip Road cemetery expansion
2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21. The property is currently zoned as Open Space II as per City of Cape Town zoning regulations. The zoning allows for cemeteries on the property; however, a consent use application will need to be applied for with the City of Cape Town relevant branch.
3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved. There are no existing approvals or conflicts for the proposed site.
4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.

The Western Cape Spatial Development Framework (WCSDF) is a strategic planning document that guides spatial development in the Western Cape province of South Africa. It aligns land use, infrastructure development, and resource management with the province's development goals, focusing on sustainability, equity, and efficiency. While the WCSDF does not explicitly mention cemeteries, it provides guidance on appropriate land use planning, including the siting of social infrastructure such as cemeteries. For cemetery expansions, the WCSDF encourages decisions that consider land availability, proximity to existing urban nodes, accessibility, and environmental sensitivity. Aligning the Klip Road cemetery expansion with the spatial planning principles of the WCSDF ensures that the project supports broader provincial goals of efficient land use, sustainable development, and equitable service delivery.	
4.2	The Integrated Development Plan of the local municipality. The City of Cape Town's Integrated Development Plan (IDP) for 2022–2027 outlines the city's strategic priorities, objectives, and strategies across various sectors, including social development, environmental sustainability, economic development, and community participation. While it doesn't specifically address cemetery expansions, its broader goals and principles are relevant to ensuring that such developments contribute to the overall well-being and sustainability of the city. The cemetery expansion should align with the IDP's goals for equitable service delivery by ensuring accessibility for all residents, regardless of their location or socio-economic status.
4.3.	The Spatial Development Framework of the local municipality. The City of Cape Town's Municipal Spatial Development Framework (MSDF) 2023 - 2028 outlines the city's priorities for sustainable development, climate resilience, and urban growth. While the plan doesn't specifically address cemetery expansions, it highlights the importance of spatial planning, equitable service distribution, and community engagement. Cemetery development should align with the city's spatial framework, ensuring accessibility and integration with existing infrastructure. Implication: The spatial strategy that a cemetery expansion meets is one of spatial justice and spatial sustainability. Expanding cemeteries in strategic locations ensures equitable access to burial sites across different communities, including underserved or rural areas. It also supports the principle of sustainability by considering future urban growth, environmental protection, and the efficient use of available land. This alignment with the city's spatial planning goals ensures that cemetery development is both beneficial to the community and consistent with long-term planning objectives.
4.4.	The Environmental Management Framework applicable to the area. The development will be in align with all City's spatial planning requirements. The project will allow the City to address the current shortage of burial space and the growing needs of the community.
5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development. Comments from authorities will be incorporated into the Final BAR.
6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development. According to the Western Cape Biodiversity Spatial Plan (WCBSBP) mapping for the proposed development site, the entire footprint lies outside any designated Protected Areas, CBAs, or ESAs. This indicates that the site does not fall within any formally recognized biodiversity priority zone and therefore poses minimal conflict with provincial conservation planning objectives.
7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA. N/A
8.	Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I. There are no changes to the screening tool report.
9.	Explain how the proposed development will optimise vacant land available within an urban area. The proposed cemetery expansion will be located on vacant land within the greater urban edge. The land belongs to the CoCT and will utilise space required for more burial space in CoCT.
10.	Explain how the proposed development will optimise the use of existing resources and infrastructure. The proposed development will entail the expansion of an existing cemetery. The existing cemetery infrastructure, including the access road and the water and sewer reticulation, will still be utilised, in order to accommodate the extended development and the additional infrastructure. This will save additional costs related to the establishment of a new site, that would require new infrastructure and resources.
11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16). Confirmation of services will be included in the Final BAR.
12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated

	Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.
Please see Appendix K.	

SECTION F: PUBLIC PARTICIPATION

The Public Participation Process ("PPP") must fulfil the requirements as outlined in the NEMA EIA Regulations and must be attached as Appendix F. Please note that If the NEM: WA and/or the NEM: AQA is applicable to the proposed development, an advertisement must be placed in at least two newspapers.

1. Exclusively for linear activities: Indicate what PPP was agreed to by the competent authority. Include proof of this agreement in Appendix E22.

N/A- The proposed cemetery expansion is not a linear development.

2. Confirm that the PPP as indicated in the application form has been complied with. All PPP must be included in Appendix F.

The PPP for the project complies with the requirements of the Environmental Regulation 41 of the EIA Regulations, 2014 (as amended) -

- Fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of the site where the activity to which the application relates is or is to be undertaken; and
- Giving written notice, in any manner provided for in section 47D of the NEMA, to –
 - the occupiers of the site and, if the applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;
 - owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken;
 - the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area;
 - (the municipality (Local and District Municipality) which has jurisdiction in the area;
 - Any organ of state having jurisdiction in respect of any aspect of the activity; and
 - any other party as required by the Competent Authority;
- Placing an advertisement in –
 - one local newspaper; or

Using reasonable alternative methods, as agreed to by the Department, in those instances where a person is desirous of but unable to participate in the process due to— (i) illiteracy;(ii) disability; or (iii) any other disadvantage.

This draft BAR will be distributed for public comment. The following public participation process, in terms of Regulation 41 of the EIA Regulations of 2014 as amended, will be implemented:

- An initial database of potential I&APs has been compiled. The database includes known adjacent landowners, ward councillors, municipal officials, relevant state departments and organs of state.
- No pre-application PPP was undertaken.
- A Site notice was fixed at a location where the public had the best chance of viewing the notice.
- Notification was given to all relevant parties as per the requirements of the EIA Regulations.
- The Basic Assessment Report is available for download at Zutari webpage
- An advertisement was placed in a local newspaper.
 - The newspaper complied with the minimum requirements of the Regulations and informed the public of the availability of the Draft BAR 30-day review and comment period, the comment period date, to whom and how to submit comments.
- One hard copy of the Draft BAR will be lodged at the local library.
- A register of Interested and Affected Parties (I&APs) was maintained.

A Comments and Responses Report is being maintained for the project and will be submitted together with the Final BAR for decision-making.

Proof of PPP is included in Appendix F.

3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.

The following State Departments and Organs of State are being consulted and will be given an opportunity to comment on this Draft BAR:

- National Department of Water and Sanitation (DWS)

- Breede-Olifants Catchment Management Agency (BOCMA)
- Cape Nature
- Heritage Western Cape
- South African Heritage Resources Agency (SAHRA)
- National Department of Agriculture, Land Reform and Rural Development
- Department of Health
- Western Cape Government, Department of Environmental Affairs and Development Planning (DEA&DP)
 - Directorate: Development Management
 - Directorate: Pollution and Chemicals Management
 - Directorate: Development Management
 - Directorate: Waste Management
- Western Cape Government, Department of Infrastructure
- Western Cape Government, Department of Social Development
- Western Cape Government, Department of Agriculture
- Western Cape Government, Department of Police Oversight and Community Safety
- South African National Biodiversity Institute (SANBI)
- City of Cape Town: Town Planning Department
- City of Cape Town: Environmental Management
- City of Cape Town: City Parks Department
- City of Cape Town: Community Services & Health
- City of Cape Town: Recreation & Parks Department
- City of Cape Town: Cemetery Management
- South African National Roads Agency SOC Ltd (SANRAL)
- Other registered Interested and Affected Parties (I&APs)

4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

N/A

5. If any of the State Departments and Organs of State did not respond, indicate which.

To be confirmed on completion of the public participation process.

6. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated into the development proposal.

To be provided on completion of the public participation process. All comments received during 30-day comment period will be responded to in the Comments and Responses Report (CRR) and appended to the BAR.

Note:

A register of all the I&AP's notified, including the Organs of State, and all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing.

The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

Your attention is drawn to Regulation 40 (3) of the NEMA EIA Regulations which states that "*Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but **must** be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority.*"

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F.

All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F.

Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required "proof" the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
 - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);

- if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
- if a facsimile was sent, a copy of the facsimile Report;
- if an electronic mail was sent, a copy of the electronic mail sent; and
- if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

1.1.	Was a specialist study conducted?	YES	NO
1.2.	Provide the name and or company who conducted the specialist study.		
	Specialist name: Zita Harilall Company: GEOSS South Africa (Pty) Ltd		
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
	Based on the Groundwater Impact Assessment conducted by GEOSS (June 2024), the proposed cemetery expansion site is situated above an unconfined aquifer and is defined by unconsolidated Quaternary sands. The aquifer is shallow, intergranular in nature, and composed of unconsolidated sand and soil, allowing groundwater to move through pore spaces. The sediments comprise fine- to medium-grained quartz-rich sands with high primary permeability and porosity, creating favourable conditions for direct recharge from rainfall and rapid vertical infiltration. This intergranular aquifer is regarded as highly vulnerable to surface-based contaminants due to the lack of confining layers. Groundwater beneath the site is part of the Cape Flats Aquifer system, with flow generally from the north-east towards the south to southwesterly and westerly directions, ultimately discharging toward Princess Vlei, located approximately 200 m southwest of the proposed expansion area. Given the very high aquifer vulnerability and the close proximity to Princess Vlei, the assessment identified a tangible risk of contaminant migration from burials into the underlying aquifer and adjacent surface water bodies. Consequently, the portion of the proposed cemetery extension closest to Princess Vlei was excluded from the final design to minimise potential groundwater contamination. The hydrogeological conditions, characterised by low yields, a shallow unconfined aquifer, and limited inter-aquifer connectivity, are not considered to present significant constraints to the development of the remaining portion of the cemetery, provided that appropriate mitigation and burial depth controls are implemented to protect groundwater resources.		
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
	Groundwater was intersected at all three piezometers installed within the study area, with water levels ranging between 1.64 m and 2.8 m below ground level (mbgl). These measurements were taken in June 2024, at the end of the dry season and the beginning of the wet season, and therefore represent the deepest seasonal water table conditions. Taking into account an estimated 1 m seasonal fluctuation in the Cape Flats Aquifer, the average groundwater depth across the site is expected to vary between 1 m and 3 m bgl. According to the Department of Health (2013), the water table at burial sites should be at least 2.5 m deep, while additional studies recommend burial only where the groundwater table exceeds 4 m bgl. The measured shallow water levels within the study area therefore pose a constraint for cemetery development, as individual graves (typically 2 m deep) could intersect or lie too close to the water table. In response to these findings, the proposed development design was modified to exclude the southern portion near Princess Vlei, where groundwater levels are shallowest and the risk of contamination is greatest. The remaining areas, located further from the Vlei, are expected to have slightly deeper groundwater levels and more suitable burial conditions. The hydrogeological conditions, including the shallow unconfined aquifer and observed water table depths, have therefore directly influenced the layout and extent of the proposed cemetery expansion, ensuring that only areas with a reduced groundwater contamination risk are considered suitable for development.		

2. Surface water

2.1.	Was a specialist study conducted?	YES	NO
2.2.	Provide the name and/or company who conducted the specialist study.		
Specialist name: Hanjo Fourie Company: Biosphere Enviro Solutions (Pty) Ltd			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		

According to Biosphere's Aquatic Ecology Compliance Report (February 2025), the following water resources were found:

Rivers:

The Diep River is the primary watercourse within the catchment area. It flows approximately 1.8 km west of the proposed project boundary, beyond the 100-meter regulated zone. The project site itself does not contain any non-perennial tributaries but is located near two concrete stormwater drainage channels. These channels are heavily infested with invasive water hyacinth (*Eichhornia crassipes*), significantly degrading the channel's function as an aquatic habitat.

Wetlands:

A combination of desktop analysis and site inspection confirmed the presence of several wetland features in the vicinity (Figure 6):

- A depression wetland (Princess Vlei) located approximately 600 meters southwest of the site.
- A floodplain wetland associated with the Princess Vlei inlet, situated about 80 meters west of the site.
- A seep wetland identified to the east of the project site; however, its classification is disputed, as the area lacks the defining characteristics of a true seep wetland.

Despite the site's location within the regulated 500-meter buffer zone, the report concludes that no direct impacts on watercourses or wetlands are anticipated due to the following factors:

- Absence of a functional hydrological connection between the site and nearby wetlands;
- The presence of a major road reserve (M5), which acts as a physical barrier separating the site from wetlands to the west (Princess Vlei);
- Wetlands visible on mapping tools are primarily sustained by municipal stormwater conveyed through concrete channels, with no natural drainage originating from the project site;
- The lack of hydrological connectivity significantly limits potential impact pathways; and
- The physical separation created by the road reserve effectively isolates the site's hydrology from adjacent wetland systems.

These findings support the suitability of the proposed site for the cemetery expansion.

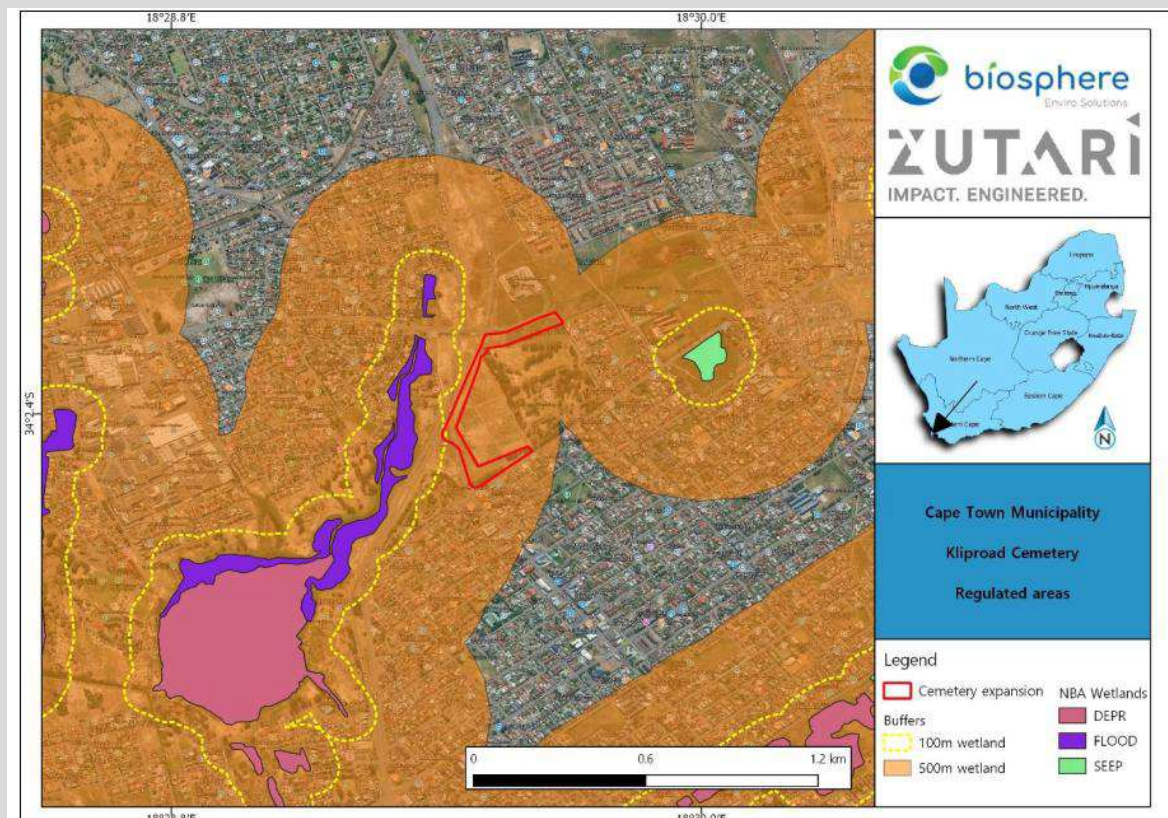


Figure 6. Overview of surface water characteristics of the proposed site

3. Coastal Environment

3.1.	Was a specialist study conducted?	YES	NO
3.2.	Provide the name and/or company who conducted the specialist study.		
	N/A - The proposed project does not fall within a coastal area.		
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
	N/A - The proposed project does not fall within a coastal area.		
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
	N/A - The proposed project does not fall within a coastal area.		
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.		
	N/A - The proposed project does not fall within a coastal area.		

4. Biodiversity

4.1.	Were specialist studies conducted?	YES	NO
4.2.	Provide the name and/or company who conducted the specialist studies.		
	Specialist name: Reuhl Lombard Company: Biosphere Enviro Solutions (Pty) Ltd		
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		
	According to the Terrestrial Biodiversity Assessment compiled by Biosphere (March 2025), the following planning and biodiversity informants were utilised: • Biodiversity Network (BioNet 2023); • Protected Areas (PA) and National Protected Area Expansion Strategy (NPAES); • Important Bird Areas (Marnewick et al., 2015); • National List of Threatened Ecosystems (2022); • National Freshwater Ecosystem Priority Areas (NFEPA) and National Wetland Map 5; • VegMap (2024 BETA); • The Western Cape Biodiversity Spatial Plan Handbook and summary booklet (CapeNature, 2017; Pool-Sandvliet et al., 2017). The following results were observed: • There are no CBAs or ESAs overlapping the project site; • Project area is not located in a PA or NPAES focus area; • Project area is not located in an important bird area; • The project area is located broadly in a nationally threatened ecosystem, namely the Cape Flat Sand Fynbos which is considered critically endangered; Despite its location within a threatened vegetation type, the site visit indicates the site is not representative of the regional vegetation type as it is altered, degraded and invaded. The project area vegetation has been altered over the years during the operation of the Klip Road cemetery. Additionally, the site is altered and transformed by the degraded grassland, hard landscapes (parking and access roads) and non-natural vegetation and trees. It is therefore, not expected to still have indigenous vegetation representing the Critically Endangered Cape Flats Sand Fynbos on site. The vegetation sensitivity as delineated by the specialist is indicated as Figure 8 above. The site host Low and Very Low habitat sensitivity. Furthermore, the Screening Tool identified the site to have the following sensitivities: • Animal species -High • Plant species – Medium • Terrestrial biodiversity – Very High The site visits confirmed that none of the animal or plant species of special concern (SCC's) were observed on site. Therefore, the proposed site is deemed as suitable for the proposed expansion.		

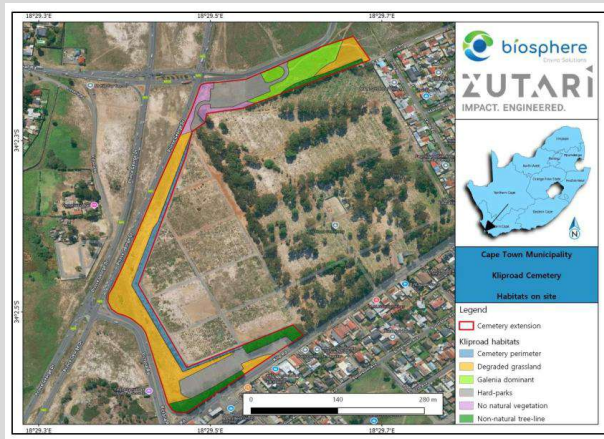


Figure 7. Habitat types

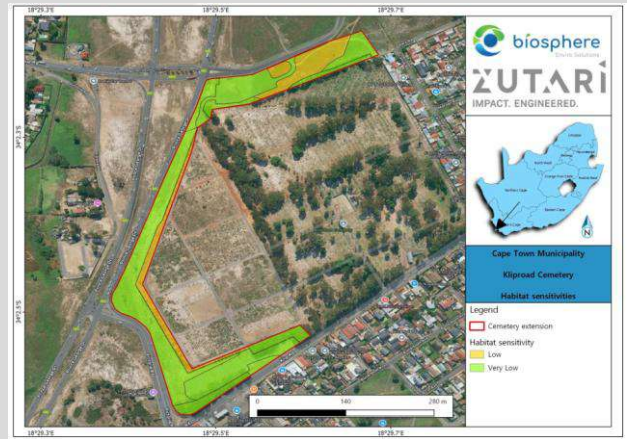


Figure 8. Sensitivity map

4.4. Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.

The Western Cape Biodiversity Spatial Plan (WCBSP) serves as a strategic tool to guide land-use planning and biodiversity conservation across the province. Its key objectives include:

- Providing management guidelines that outline the desired land-use practices for each category of biodiversity priority area.
- Supporting spatial planning and land-use decision-making to promote environmentally sustainable development and responsible resource use.

To achieve these goals, the WCBSP classifies habitats according to their conservation value, in descending order of ecological importance:

- Protected Areas (PA) – formally conserved areas under legal protection
- Critical Biodiversity Areas 1 (CBA1) – irreplaceable sites essential for meeting biodiversity targets.
- Critical Biodiversity Areas 2 (CBA2) – important areas that contribute to ecological connectivity and resilience.
- Ecological Support Areas 1 (ESA1) – natural areas that support ecological processes and buffer CBAs.
- Ecological Support Areas 2 (ESA2) – modified areas that still retain some ecological function and support biodiversity.

According to the WCBSP mapping for the proposed development site, the entire footprint lies outside any designated Protected Areas, CBAs, or ESAs. This indicates that the site does not fall within any formally recognised biodiversity priority zone and therefore poses minimal conflict with provincial conservation planning objectives.

4.5. Explain what impact the proposed development will have on the site specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.

The proposed development site lies outside any Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) as identified in the Western Cape Biodiversity Spatial Plan (WCBSP). Consequently, the project is not expected to affect designated conservation zones.

Although the proposed development does not intersect any CBAs or ESAs, mitigation measures have still been considered. These mitigation measures have been included as part of this BAR and the project EMPr.

4.6. If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.

N/A - The proposed development does not fall within a protected area.

4.7. Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.

According to the Terrestrial Biodiversity Compliance Statement compiled by Biosphere (2025), indicates that the Screening Tool identified several animal species (including mammals, insects, reptiles, and amphibians) as Species of Special Concern (SCC) potentially associated with the area. However, none of these species were recorded during the site visit. This suggests that the site does not serve as critical habitat for these species, thereby reinforcing the suitability of the proposed cemetery expansion from a biodiversity perspective.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.

The proposed expansion will occur along Klip Road in Grassy Park and lie adjacent to the existing Klip Road Cemetery. The site is surrounded by various land uses; to the far north is open land and a waste facility, to the east is a residential area and to the south the Klip Road mixed use commercial and residential activity spine. The existing Klip Road cemetery is surrounded by residential neighborhoods of Parkwood, Grassy Park and Southfield. To the north of the cemetery and proposed extension sites is the higher order Prince George Drive. Princess Vlei is located to the south west of the site.

The proposed expansion is not expected to have any significant impact on the current geographical aspects of the site given the highly disturbed and urbanised surrounding environment. The proposed development will affect the geographical impacts on a local scale as it involves clearing of vegetation, levelling and planting of lawn grasses, slightly altering the topography of the site.

The following geographical and physical aspects apply:

- The transformation of land to a cemetery;
- The excavation of land for burials may possibly disturb the soil; and
- The topography of the site is gentle which is ideal for the development of a cemetery.

6. Heritage Resources

6.1.	Was a specialist study conducted?	YES	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
	Specialist name: Quahnita Samie Company: Vidamemoria Heritage Consultants		
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		
	A Heritage Practitioner conducted a screening assessment on the site and proposed development and completed a Notice of Intent to Develop (NID) in terms of Section 38 of the NHRA. A NID (case no: HWC24040805SB0625) was submitted to Heritage Western Cape (HWC). A record of decision from HWC was received on 18 July 2024, wherein the applicant was notified that there is a reason to believe that the proposed extension of Klip Road will impact on heritage resources. Therefore, HWC requested a Heritage Impact Assessment (HIA) in terms of section 38 of the NHRA, and the following additional reports: • Background Historical Report • Social Historical Study • Archaeological Impact Assessment There are on-going discussions between the Heritage specialists and the Heritage Western Cape Branch regarding the way forward. All communications and comments received will be included in the Comments and Response Form.		

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.	
According to the baseline heritage study, no significant archaeological materials were identified on the surface, and the likelihood of uncovering any substantial finds below the surface is considered minimal. The study further concluded that the visible materials have very low cultural significance, likely due to the disturbed nature of the area.	

8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.																	
	<u>Population and Household:</u> In Grassy Park, the population is expected to grow from 102 304 in 2025 to 121 057 in 2034, with households rising from 25 085 to 27 662 respectively. <table> <tr> <th>Area</th><th>Aspect</th><th>2024</th><th>2029</th><th>2034</th></tr> <tr> <td rowspan="2">Grassy Park</td><td>Population</td><td>102 304</td><td>111 286</td><td>121 057</td></tr> <tr> <td>Households</td><td>25 085</td><td>27 287</td><td>27 662</td></tr> </table> (Urban-Econ Via Quantec (EasyData) 2025) The projected population growth in Grassy Park suggests a rising demand for burial space at the existing Klip Road cemetery. The corresponding increase in households, from 25,085 to 27,662, indicates a growing community that will require expanded cemetery capacity over time. Given this steady growth, the cemetery expansion is necessary to accommodate future burial needs and prevent capacity constraints.				Area	Aspect	2024	2029	2034	Grassy Park	Population	102 304	111 286	121 057	Households	25 085	27 287	27 662
Area	Aspect	2024	2029	2034														
Grassy Park	Population	102 304	111 286	121 057														
	Households	25 085	27 287	27 662														

Age:

Grassy Park's age profile reveals that 22.0% of its population falls within the 0–14-year range, indicating a substantial dependent youth segment. Meanwhile, 10.5% of residents are aged 65 and older, pointing to an aging middle-aged population that will likely lead to a gradual increase in mortality rates over time. This demographic shift underscores the anticipated rise in burial needs, reinforcing the urgency of expanding Klip Road Cemetery. These trends emphasize the importance of forward-looking planning to ensure sufficient long-term capacity. Although current burial demand may be moderate, the growing elderly population is expected to place continuous pressure on cemetery space. Therefore, the expansion should prioritize adequate land allocation, robust infrastructure, and accessible design to meet the evolving needs of the community in the years to come.

Household income:

The household income data reveals that Grassy Park is largely made up of low- to middle-income families. Specifically, 57.7% of households fall within the low-income bracket, while 40.1% are classified as middle-income. In contrast, only a small fraction, 2.2%, qualify as high-income. This distribution underscores the area's modest economic profile, with a slightly stronger presence in the middle-income category but a clear scarcity of affluent households. Given this financial landscape, there is a pressing need for cemetery services that are both affordable and accessible. The predominance of low-income households suggests that many residents may depend on public burial options, making cost-conscious planning a critical consideration.

Employment:

Grassy Park records an employment rate of just 39.9%, alongside a proportion of economically inactive individuals at 48.8%. These figures point to a significant level of economic dependency and suggest heightened socio-economic vulnerability within the community. Such data is crucial for identifying areas that may be more sensitive to shifts in service provision, infrastructure development, or land use planning.

Elevated unemployment and economic inactivity can limit residents' access to private burial services, reinforcing the need for affordable and accessible public cemeteries. These disparities must be considered to ensure equitable service delivery. Moreover, such initiatives present an opportunity to stimulate local employment during both construction and operational phases, contributing to broader community upliftment.

Overall, population growth, aging demographics, and rising mortality rates in Grassy Park signal an urgent need for expanded cemetery space. With a mix of income levels and unemployment rates, the development will provide affordable burial options while potentially offering potential for local job creation and ensuring community support. The overall socio-economic impact assessment will have a positive impact on the proposed development.

8.2.	Explain the socio-economic value/contribution of the proposed development.
The expansion of the Klip Road Cemetery offers an opportunity to promote local procurement and support the surrounding economy. By engaging contractors and service providers based in Grassy Park and nearby areas, the project could ensure that economic benefits are retained within the local community. This includes appointing local construction firms for site preparation, access roads, fencing, and infrastructure upgrades, etc. Landscaping and environmental management can be carried out by local specialists, using indigenous plants and environmentally appropriate solutions to enhance the cemetery's natural character. Small, medium, and micro enterprises (SMMEs) may also be contracted for services such as site security, catering, and cleaning during and after construction. The expansion of the Klip Road Cemetery is expected to have a minor but positive impact on local procurement.	
8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.
CoCT will prioritise hiring of local labour during construction and operational phases (e.g., grounds maintenance, security, landscaping).	
8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.
The generation of noise and dust during the proposed activities is expected to be minimal and of negligible significance. This is due to the limited scale and duration of construction and the implementation of standard control measures. While there will be minor disruptions, these are unlikely to meaningfully affect the broader landscape or the community's sense of place. The impact will be transient and temporary.	

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1. Details of the alternatives identified and considered

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred property and site alternative.	
The proposed development entails the expansion of the existing Klip Road cemetery and as such alternative properties/ sites cannot be considered.	
Provide a description of any other property and site alternatives investigated.	

Initially, the CoCT considered Erf 75562, Erf 75567, Erf 75569, Erf 75570 and Erf 75571 located between Victoria Road, Klip Road and Prince George Drive. A Groundwater Impact Assessment has been conducted for the mentioned erven. The study recommended that, if possible, an alternative site should be investigated for the purpose of establishing a new cemetery due to the following factors:

- A typical mitigation measure would be that the burial of bodies should only take place where the depth to the water table exceeds 4 mbgl. In this case, it is unlikely that this mitigation measure can be met.
- Another standard mitigation measure to protect groundwater would be that boreholes should not be used for potable consumption within 350 m of the site of particular significance in this instance are those situated south of the site (and the canal that feeds Princes Vlei).
- Establishment of a cemetery is not recommended within 200m of a wetland. Princess Vlei is located 200m away.

As a result of the outcome of the Groundwater Impact Assessment, only erven directly surrounding the cemetery will be considered for extension (Erf 75562, Erf 75567, Erf 75569 and Erf 75570), as they pose less risk to groundwater. Erf 75571 was initially part of the study area but was found not suitable (high risk) and is therefore excluded for the proposed development.

An alternative site with favourable geological and hydrogeological conditions (i.e. deep-water levels in soils above a fractured aquifer) was considered (adjacent erven). It is unlikely the risk of contamination to aquifer, which is an important source of groundwater, can be practically and appropriately mitigated for the other erven (Erf 75562, Erf 75567, Erf 75569 and Erf 75570).

Given the inability to entirely mitigate risk and due to the lack of appropriate cemetery space within the CoCT, the proposed erven are the preferred and only alternative.



Figure 9. Original expansion footprint (green) next to the existing Klip Road cemetery (pink)



Figure 10. New preferred layout after the groundwater impact assessment. The portion excluded is highlighted in yellow.

Provide a motivation for the preferred property and site alternative including the outcome of the site selectin matrix.

Only the erven directly adjacent to the existing Klip Road cemetery (Erf 75562, Erf 75567, Erf 75569, and Erf 75570) are being considered for the proposed expansion. Their proximity to the current cemetery makes them suitable for extension. Key factors influencing site selection include accessibility, land ownership, proximity to residential areas, and the site's suitability for cemetery use as confirmed by aquatic, terrestrial, and groundwater assessments.

The proposed site offers convenient access and provides a logical extension to the existing cemetery footprint.

Provide a full description of the process followed to reach the preferred alternative within the site.

See description and motivation above.

Provide a detailed motivation if no property and site alternatives were considered.

No alternative properties or sites were considered for the proposed cemetery extension due to the findings of the Groundwater Impact Assessment. This assessment identified that only the erven directly adjacent to the existing Klip Road Cemetery pose a low risk to groundwater resources and are therefore suitable for development. Erf 75571, which was initially included in the study area, was excluded due to its classification as high risk for groundwater contamination.

In addition to favourable hydrogeological conditions, the proposed site is already highly transformed and does not support any plant or animal species of conservation concern. It also lacks significant environmental sensitivities, making it a low-impact option for expansion. Given these factors, proximity to the existing cemetery, reduced environmental risk, and compatibility with surrounding land use, no alternative sites were deemed necessary or appropriate for consideration.

List the positive and negative impacts that the property and site alternatives will have on the environment.

The proposed site will have the following positive and negative impacts:

Positive impacts:

- There will be an increase in burial space in the area.
- Social and cultural benefits will arise from providing dignified burial access, meeting the religious and cultural needs of surrounding communities that incorporate burials into their practices. The proposed site is conveniently attached to the existing Klip Road cemetery, ensuring easy access.
- The project includes on-site stormwater management, which will reduce flooding, prevent soil erosion, and lower water pollution caused by runoff.
- The digging of graves and the development of access roads will help remove invasive plant species. Additionally, ongoing landscape maintenance will control and remove alien invasive species.
- The site's increased utilisation is expected to improve the surrounding communities' sense of place and security.

Negative impacts (if the project is not properly managed):

- Site clearing and construction, especially for roads, fencing, and infrastructure, may result in topsoil loss and elevate the risk of alien invasive species becoming established in disturbed areas.
- Potential for stormwater runoff and sedimentation if not mitigated appropriately.
- Temporary visual impacts during construction.
- Potential groundwater contamination.
- Construction-related waste, including with oil/fuel leakages, littering and cement batching.

1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
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Provide a description of the preferred activity alternative.

The proposed expansion of the cemetery will cover an area of approximately 49 633 m² (5 ha) and will comprise of typical cemetery infrastructures such as, inter alia:

- Burial blocks
- Internal roads to be used as pathways for pedestrians and for vehicle access
- Parking
- Guard house with controlled security access
- Church
- Ablution facilities
- Stormwater infrastructure
- Fencing

The cemetery extension might use some of the already existing infrastructure for the operational Klip Road cemetery.

Burial is a significant aspect of many religious and cultural practices. In South Africa, burial is the most common method observed across various religious groups and traditional faiths. Offering a burial site option is an important part of these practices, supporting the religious and cultural needs of communities in and around the Grassy Park area.

The proposed cemetery extension aligns with the CoCT Municipality's Spatial Development Framework (MSDF). Specifically, Spatial Strategy 3 of the MSDF emphasises planning and prioritising adequate cemetery space to meet burial demands. The current land is vacant and transformed but affected by invasive alien plants and informal settlements, and it does not meet the community or City's needs. It is also unsuitable for agricultural or other uses. The proposed cemetery is strategically located to expand on the existing Klip Road cemetery by utilising adjacent unused land already zoned for this purpose.

Because the site is adjacent to the current Klip Road cemetery, its use for burial activities, rather than alternative methods, effectively addresses the social, cultural, and religious needs of the nearby communities.

Provide a description of any other activity alternatives investigated.

No other activity alternatives were investigated. The applicant intends to expand the Klip Road cemetery onto adjacent erven. Burial is the only activity considered due to its significant importance in many religions and cultures. The proposed expansion supports the land use, addresses the community's need for additional burial space, and aligns with the City's requirements.

Provide a motivation for the preferred activity alternative.

The CoCT is facing a shortage of suitable and well-located burial space across the city. The Recreation and Parks department is responsible for the provision of burial space within the CoCT and is seeking to realise the need for burial space through the approval of this project.

Strategy 3 of the City of Cape Town's SDF aims to plan for and prioritise the adequate provision of cemetery space to meet burial demand. The proposed expansion of the Hout Bay Cemetery aligns with the MSDF by ensuring sufficient burial space to accommodate the growing need across the city.

While cremation provides an alternative method of disposing of human remains without requiring additional land, it is not regarded as a dignified burial according to some religions and cultures. Hence, a burial site that complements the adjacent existing Klip Road cemetery is proposed. To minimise the negative environmental impacts associated with burials, various

mitigation measures are detailed in this BAR, the EMPr (Appendix H), and the accompanying specialists' assessment reports (Appendix G). Therefore, burial remains the preferred and only activity considered in this report.	
Provide a detailed motivation if no activity alternatives exist.	
The Klip Road cemetery is one of the identified cemeteries to be expanded. The expansion of the cemetery is proposed in response to the need for more cemeteries in Cape Town, which has limited appropriate land available for such utilisation. As explained in Section 1.2 above, burial of the deceased is an important social and religious custom in South African society, and traditional burial remains the preferred method of disposing of human remains over alternatives such as cremation. The preferred and only alternative seeks to address the growing city-wide need for appropriate, available land for burial space.	
List the positive and negative impacts that the activity alternatives will have on the environment.	
Refer to response in Section 1.1 for the site alternative positive and negative impacts.	
1.3.	Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts
Provide a description of the preferred design or layout alternative.	
The preferred layout of the cemetery is approximately 49 633m ² . The proposed cemetery will include burial blocks, internal roads, parking facilities, new guard house, church, ablution facilities, stormwater infrastructure and perimeter fencing. Vehicular access to the extended cemetery will be provided via the existing Klip Road which is situated next to major transport access routes, such as the M5.	
Provide a description of any other design or layout alternatives investigated.	
The Recreation and Parks department has identified several parcels of land across the City as potential sites for the development of a cemetery. Developing a cemetery requires various feasibility studies to assess the suitability of the proposed properties and layout. The proposed layout was designed with consideration of environmental studies and has been selected as the preferred option because it avoids any environmental sensitivities both on-site and in surrounding areas. Additionally, the layout is consistent with current land use and siting requirements. Therefore, no alternative designs were explored.	
Provide a motivation for the preferred design or layout alternative.	
The preferred design and layout as depicted in Appendix B1 is preferred because it maximises the number of graves and allows for full utilisation of the vacant land adjacent to the existing cemetery. This preferred design alternative of the cemetery is based on the City's standards for cemetery layout, as stated in the National Health Act Regulations 363 of 2013, which informs the requirements and regulations that should be abided by: All burial sites must comply with the following environmental requirements: - Be located outside the 100-year floodplain; - Be located at least 350 m from ground water sources used for drinking purposes and at least 500 m from the nearest habitable building; - For a preferred burial site with a soil of sand-clay mix of low porosity and a small and fine-grain texture, the water table should be at least 2.5m deep in order to allow for traditional grave depth of six feet (1.8 metres); - For areas with higher water tables, the local government may determine a reasonable depth with additional walling recommendations to protect underground water; and - The covering soil shall not be less than 1 m, should two bodies be buried in the same grave, 300mm of soil shall be maintained between the coffins. The preferred design or layout alternative took into consideration the above requirements of the National Health Act Regulations 363 of 2013,	
Provide a detailed motivation if no design or layout alternatives exist.	
No other design alternatives were investigated. The preferred design will maximise the number of graves on site as there is limited land available within the CoCT for cemeteries.	
List the positive and negative impacts that the design alternatives will have on the environment.	
Positive impacts: - The site is already significantly degraded, reducing the risk of disturbing sensitive vegetation or natural aquatic features. - The design avoids environmentally sensitive areas. - The cemetery will be easily accessible due to its proximity to the existing facility, which is familiar to the local community. - There will be an increase in burial space in the area. - Appropriate zoning and planned use of the site. - Social and cultural benefits will arise from providing dignified burial access, meeting the religious and cultural needs of surrounding communities that incorporate burials into their practices. The proposed site is conveniently attached to the existing Hout Bay cemetery, ensuring easy access. - The project includes on-site stormwater management, which will reduce flooding, prevent soil erosion, and lower water pollution caused by runoff. - The digging of graves and the development of access roads will help remove invasive plant species. Additionally, ongoing landscape maintenance will control and remove alien invasive species. - The site's increased utilisation is expected to improve the surrounding communities' sense of place and security. Negative impacts (if the project is not properly managed):	

- Site clearing and construction, especially for roads, fencing, and infrastructure, may result in topsoil loss and elevate the risk of alien invasive species becoming established in disturbed areas. - Potential for stormwater runoff and sedimentation if not mitigated appropriately. - Temporary visual impacts during construction. - Potential groundwater and soil contamination. - Construction-related waste, including with oil/fuel leakages, littering and cement batching.	
Additional traffic occurs during peak days and hours, such as Saturday mornings.	
1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred technology alternative:	
No technology alternatives have been investigated for the proposed cemetery expansion. The preferred (and only) technology alternative is the expansion of the Klip Road cemetery.	
Provide a description of any other technology alternatives investigated.	
N/A – No feasible or reasonable technology alternatives to the proposed activity exist.	
Provide a motivation for the preferred technology alternative.	
The applicant proposes to expand the Klip Road cemetery to address the need for more burial spaces within the Grassy Park area as well as the broader City.	
Provide a detailed motivation if no alternatives exist.	
N/A - No feasible or reasonable technology alternatives have been identified for the proposed expansion.	
List the positive and negative impacts that the technology alternatives will have on the environment.	
N/A. Please see the response given above in Section 1.1 for the preferred (only) site alternative positive and negative impacts.	
1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred operational alternative.	
The preferred operational alternative involves expanding the existing Klip Road cemetery on the adjacent properties (Erf 75562, Erf 75567, Erf 75569, and Erf 75570), which will continue to function as a cemetery for the foreseeable future. Once operational, the site will ensure it meets the burial needs of the surrounding community.	
Provide a description of any other operational alternatives investigated.	
No operational alternatives exist.	
The preferred operational alternative is the expansion of the Klip Road cemetery to be managed by the City of Cape Town in line with its obligations under the Regulations Relating to the Management of Human Remains, 2013 and any conditions of environmental authorisation (once granted). The standard operational requirements determined by the City will be complied with, as well as regulations set out in the National Health Act Regulations 363 of 2013 relating to burial in excavated land (Chapter 5) and the handling of radioactive human remains (Chapter 8). The regulations regarding the role of funeral undertakers and the administration, control and management of cemeteries will be followed (Cemeteries, Crematoria and Funeral Undertakers By-Law, 2011; National Health Act Regulations 363 of 2013).	
Provide a motivation for the preferred operational alternative.	
Operational alternatives are not applicable since the proposed activity is the development of the cemetery.	
The expansion of the Klip Road cemetery is driven by the pressing need for more burial space, as the current facility is almost full. Without this development, nearby communities would struggle to access local burial services.	
Provide a detailed motivation if no alternatives exist.	
The site was identified as the most suitable location for cemetery expansion due to limited available land and urgent community need. No viable alternatives exist, and the development aligns with existing infrastructure and zoning. Additionally, the preferred and only operational alternatives are based on the requirements stated in the National Health Act Regulations 363 of 2013 and Cemeteries, Crematoria and Funeral Undertakers By-Law, 2011.	
List the positive and negative impacts that the operational alternatives will have on the environment.	
Positive Impacts: - Provides long-term access to burial space for the Grassy Park community. - Enables removal of alien invasive plant species currently present on the site. Negative Impacts: - Site clearing and construction, especially for roads, fencing, and infrastructure, may result in topsoil loss and elevate the risk of alien invasive species becoming established in disturbed areas.	
1.6.	The option of not implementing the activity (the 'No-Go' Option).
Provide an explanation as to why the 'No-Go' Option is not preferred.	
The No-go Alternative is the option of not implementing the proposed development and is the benchmark against which the impacts of the proposed development can be evaluated. In this alternative, the site would retain its current land use, as heavily	

transformed and underused open space with illegal settlements. The No-Go alternative is not considered viable, as the existing cemetery is nearing full capacity. Without the proposed development, there will be no operational burial space available in the area, which would create significant challenges for accommodating future burials within the CoCT.

If the cemetery is not expanded, local residents will be forced to travel long distances to find alternative burial sites. However, since the shortage of burial space is a city-wide issue, this will create cumulative problems for other cemeteries, which will also reach full capacity.

1.7.	Provide an explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.
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N/A - Other than the preferred site design layout and option of not undertaking the proposed development, no alternative exists to enable the desired expansion.

1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.
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The preferred alternative is the expansion of the existing Klip Road cemetery on Erf 75562, Erf 75567, Erf 75569, and Erf 75570, with a proposed development footprint of approximately 49 633 m². This site was identified by the CoCT Recreation and Parks Department as one of the few viable options for additional burial space.

The original site layout included Erf 75571. However, this portion was then excluded from the proposed development footprint due to the high risk of groundwater contamination. As a result, no further site alternatives were not considered applicable since there are no comparable undeveloped portions of land in the area appropriate for use as a cemetery. The preferred site is located adjacent to the existing Hout Bay cemetery and is highly transformed and does not contain any plant or animal species of concern, nor are there any environmental sensitivities. Therefore, the site is suitable for the cemetery extension. The proximity of the site to the community is also worth noting, as it benefits the community, reducing the need for them to travel far for burials. Therefore, one alternative, the expansion of Klip Road cemetery with a development footprint of approximately 49 633 m² (5 hectares), is assessed.

No alternative activities or technologies were considered, as cemetery development typically involves standard infrastructure such as burial blocks, internal roads, ablution facilities, and related services. No aquatic or terrestrial sensitive areas are located within the proposed footprint.

With the implementation of recommended mitigation measures, the project is expected to manage any environmental impacts effectively while addressing the urgent need for expanded burial space in Cape Town.

2. “No-Go” areas

Explain what “no-go” area(s) have been identified during identification of the alternatives and provide the co-ordinates of the “no-go” area(s).
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There are no No-go areas delineated by specialists. However, No-go areas would be all areas outside the actual expansion footprint and would for the purposes of construction need to include all areas outside the site boundary.

3. Methodology to determine the significance ratings of the potential environmental impacts and risks associated with the alternatives.

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.

No significant impacts were assessed for the proposed development. All specialists undertook compliance statements which were in line with the guidelines and protocols for specialist assessments. The proposed development sites do not contain any definable sensitive areas and has been heavily transformed.

The following methodology was used to assess the impacts:

This section outlines the proposed method for assessing the significance of the potential environmental impacts. For each predicted impact, criteria are ascribed, and these include the intensity (size or degree scale), which also includes the type of impact, being either a positive or negative impact; the duration (temporal scale); and the extent (spatial scale), as well as the probability (likelihood). The methodology is quantitative, whereby professional judgement is used to identify a rating for each criteria based on a seven-point scale (refer to Table 3); and the significance is auto-generated using a spreadsheet through application of the calculations in Figure 2. Specialists can comment where they disagree with the auto-calculated impact significance rating.

Calculations

For each predicted impact, certain criteria are applied to establish the likely **significance** of the impact, firstly in the case of no mitigation being applied and then the with the most effective mitigation measure(s) in place.

These criteria include the **intensity** (size or degree scale), which also includes the **type** of impact, being either a positive or negative impact; the **duration** (temporal scale); and the **extent** (spatial scale). These numerical ratings are used in an equation whereby the **consequence** of the impact can be calculated. Consequence is calculated as follows:

$$\text{Consequence} = \text{type} \times (\text{intensity} + \text{duration} + \text{extent})$$

To calculate the significance of an impact, the **probability** (or likelihood) of that impact occurring is applied to the consequence.

$$\text{Significance} = \text{consequence} \times \text{probability}$$

Depending on the numerical result, the impact would fall into a significance category as negligible, minor, moderate or major, and the type would be either positive or negative.

Figure 4: Calculation of significance

Table 3: Assessment criteria for the evaluation of impacts

Criteria	Numerical Rating	Category	Description
Duration	1	Immediate	Impact will self-remedy immediately
	2	Brief	Impact will not last longer than 1 year
	3	Short term	Impact will last between 1 and 5 years
	4	Medium term	Impact will last between 5 and 10 years
	5	Long term	Impact will last between 10 and 15 years
	6	On-going	Impact will last between 15 and 20 years
	7	Permanent	Impact may be permanent, or in excess of 20 years
Extent	1	Very limited	Limited to specific isolated parts of the site
	2	Limited	Limited to the site and its immediate surroundings
	3	Local	Extending across the site and to nearby settlements
	4	Municipal area	Impacts felt at a municipal level
	5	Regional	Impacts felt at a regional level
	6	National	Impacts felt at a national level
	7	International	Impacts felt at an international level
Intensity	1	Negligible	Natural and/ or social functions and/ or processes are negligibly altered
	2	Very low	Natural and/ or social functions and/ or processes are slightly altered
	3	Low	Natural and/ or social functions and/ or processes are somewhat altered
	4	Moderate	Natural and/ or social functions and/ or processes are moderately altered
	5	High	Natural and/ or social functions and/ or processes are notably altered
	6	Very high	Natural and/ or social functions and/ or processes are majorly altered
	7	Extremely high	Natural and/ or social functions and/ or processes are severely altered
Probability	1	Highly unlikely / None	Expected never to happen
	2	Rare / improbable	Conceivable, but only in extreme circumstances, and/or might occur for this project although this has rarely been known to result elsewhere
	3	Unlikely	Has not happened yet but could happen once in the lifetime of the project, therefore there is a possibility that the impact will occur
	4	Probable	Has occurred here or elsewhere and could therefore occur
	5	Likely	The impact may occur
	6	Almost certain / Highly probable	It is most likely that the impact will occur
	7	Certain / Definite	There are sound scientific reasons to expect that the impact will definitely occur

When assessing impacts, broader considerations are also taken into account. These include the level of confidence in the assessment rating; the reversibility of the impact; and the irreplaceability of the resource as set out in Table 4, Table 5 and Table 6, respectively.

Table 4: Definition of confidence ratings

Category	Description
Low	Judgement is based on intuition
Medium	Determination is based on common sense and general knowledge
High	Substantive supportive data exists to verify the assessment

Table 5: Definition of reversibility ratings

Category	Description
Low	The affected environment will not be able to recover from the impact - permanently modified
Medium	The affected environment will only recover from the impact with significant intervention
High	The affected environment will be able to recover from the impact

Table 6: Definition of irreplaceability ratings

Category	Description
Low	The resource is not damaged irreparably or is not scarce
Medium	The resource is damaged irreparably but is represented elsewhere
High	The resource is irreparably damaged and is not represented elsewhere

Table 7: Significance Categories

Significance	Negative	Positive	Score
Neutral/Negligible	neutral	neutral	0-15
Very low	very low -	very low +	15-30
Low	low -	low +	31-45
Medium	med -	med +	46-60
Medium-high	med-high -	med-high +	61-75
High	high -	high+	76-90
Fatal flaw	fatal flaw	Very high +	>90

4. Assessment of each impact and risk identified for each alternative

Note: The following table serves as a guide for summarising each alternative. The table should be repeated for each alternative to ensure a comparative assessment. The EAP may decide to include this section as Appendix J to this BAR.

CONSTRUCTION PHASE

Project phase	Construction			
Impact	Dust and Air Pollution			
Description of impact	Construction activities such as excavation, earthmoving, and transportation of materials can result in increased dust and emissions, negatively affecting air quality for nearby residents and site users.			
Mitigatability	Medium	Mitigation exists and will considerably reduce the significance of impacts		
Potential mitigation	Implement dust suppression measures, such as regular water spraying, covering stockpiles, and limiting work during windy conditions.			
Assessment	Without mitigation		With mitigation	
Nature	Negative		Negative	
Duration	Brief	impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year

Extent	Local	Limited to the site and its immediate surroundings	Local	Limited to specific isolated parts of the site
Intensity	Moderate	Natural and/ or social functions and/ or processes are somewhat altered	Low	Natural and/ or social functions and/ or processes are slightly altered
Probability	Likely	It is most likely that the impact will occur	Unlikely	The impact may occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	High	The affected environment will only recover from the impact with significant intervention	High	The affected environment will only recover from the impact with significant intervention
Resource irreplaceability	Medium	The resource is damaged irreparably but is represented elsewhere	Medium	The resource is damaged irreparably but is represented elsewhere
Significance	Low - negative		Very Low - negative	
Comment on significance	Dust and Air Pollution pose health risks but are manageable with standard mitigation measures.			
Cumulative impacts	Adds to temporary degradation of urban air quality during peak construction periods, in combination with other urban works.			

Project phase	Construction			
Impact	Traffic congestion			
Description of impact	Construction vehicles and delivery trucks may contribute to short-term congestion along Klip Road and nearby intersections, especially during peak hours.			
Mitigatability	High	Mitigation exists and will considerably reduce the significance of impacts		
Potential mitigation	Implement traffic management strategies, including scheduled deliveries and clear signage to reduce disruption.			
Assessment	Without mitigation		With mitigation	
Nature	Negative		Negative	
Duration	Brief	impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Local	Limited to the site and its immediate surroundings	Local	Limited to specific isolated parts of the site
Intensity	Moderate	Natural and/ or social functions and/ or processes are somewhat altered	Low	Natural and/ or social functions and/ or processes are slightly altered
Probability	Likely	It is most likely that the impact will occur	Probable	The impact may occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	High	The affected environment will only recover from the impact with significant intervention

Resource irreplaceability	Medium	The resource is damaged irreparably but is represented elsewhere	Medium	The resource is damaged irreparably but is represented elsewhere
Significance	Low - negative		Very Low - negative	
Comment on significance	Without proper planning, construction traffic can disrupt residents and businesses and exacerbate road safety concerns. Mitigation can effectively lower the severity.			
Cumulative impacts	Adds short-term strain to road networks already used for high-frequency funeral traffic on weekends.			

Project phase	Construction			
Impact	Sense of place			
Description of impact	Construction activities, including the removal of existing vegetation, surface clearing, the presence of machinery, and the general construction disturbance, can alter the visual character of the area and lead to negative visual impacts.			
Mitigatability	High	Mitigation exists and will considerably reduce the significance of impacts		
Potential mitigation	Mitigation measures to minimise the impact of construction activities include careful site management to reduce dust and visual clutter, as well as screening of construction areas wherever possible to limit visibility and disturbance. Implementing phased construction helps minimise the area disturbed at any one time, reducing the overall environmental and visual impact. Additionally, the prompt removal of construction debris ensures a cleaner and safer site, contributing to better overall site conditions throughout the project.			
Assessment	Without mitigation		With mitigation	
Nature	Negative		Negative	
Duration	Brief	impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Local	Limited to the site and its immediate surroundings	Local	Limited to specific isolated parts of the site
Intensity	High	Natural and/ or social functions and/ or processes are somewhat altered	Moderate	Natural and/ or social functions and/ or processes are slightly altered
Probability	Likely	It is most likely that the impact will occur	Probable	The impact may occur
Confidence	High	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	High	The affected environment will only recover from the impact with significant intervention	High	The affected environment will only recover from the impact with significant intervention
Resource irreplaceability	Low	The resource is damaged irreparably but is represented elsewhere	Low	The resource is damaged irreparably but is represented elsewhere
Significance	Low - negative		Very Low - negative	
Comment on significance	The visual impact during construction is temporary and can be reduced through effective mitigation.			
Cumulative impacts	Potential for cumulative visual impacts if other construction activities are occurring in the area simultaneously.			

OPERATIONAL PHASE

Project phase	Operation			
Impact	Contamination of Groundwater due to the Decomposition of Human Remains.			
Description of impact	Increased nutrient, pathogenic and inorganic parameter concentrations in groundwater. This may lead to adverse sanitary issues in the area and impact nearby ecological systems. Further, increased nutrient loadings may lead to eutrophic conditions.			
Mitigatability	High	Mitigation exists and will considerably reduce the significance of impacts		
Potential mitigation	- Where possible, ensure burial occurs sufficiently above water table depth to enable natural attenuation in the vadose zone (region between surface and water table). Harmful bacteria, viruses and pathogens tend to die off during final stages of decomposition and therefore tend to not persist in the environment. - Installation of impermeable liner beneath the cemetery to prevent the deterioration of groundwater quality. - Limit groundwater use of the shallow aquifer immediately downgradient/ downstream of the site. - Install appropriate stormwater management systems to direct uncontaminated stormwater off-site. - Monitoring wells are required in order to detect any potential contamination as quickly as possible.			
Assessment	Without mitigation		With mitigation	
Nature	Negative		Negative	
Duration	Short term	impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Local	Limited to the site and its immediate surroundings	Local	Limited to specific isolated parts of the site
Intensity	Low	Natural and/ or social functions and/ or processes are somewhat altered	Very low	Natural and/ or social functions and/ or processes are slightly altered
Probability	Almost certain	It is most likely that the impact will occur	Likely	The impact may occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	Medium	The affected environment will only recover from the impact with significant intervention
Resource irreplaceability	High	The resource is damaged irreparably but is represented elsewhere	Medium	The resource is damaged irreparably but is represented elsewhere
Significance	High - negative		Medium - negative	
Comment on significance	The potential for groundwater contamination during the operational phase is rated as high significance (negative) without mitigation, primarily due to the shallow unconfined aquifer, highly permeable sandy soils, and the presence of sensitive receptors, including Princess Vlei and surrounding groundwater users. Leachate generated from the decomposition of human remains may result in elevated nutrient (nitrate, ammonia, phosphate), pathogenic, and inorganic concentrations within the groundwater. This degradation could lead to adverse sanitary conditions, affect domestic groundwater use, and contribute to eutrophic conditions in nearby wetlands or vleis. With the implementation of appropriate mitigation measures, including maintaining a minimum vertical separation distance between graves and the seasonal high-water table, employing lining or walling in shallow groundwater zones, and excluding the portion of the site near Princess Vlei, the risk of groundwater contamination is substantially reduced. Additional measures such as ongoing			

	groundwater monitoring, seasonal burial management, and stormwater control further decrease the potential impact. Accordingly, the impact significance is expected to decrease from high (negative) to medium (negative) with the application of mitigation and management actions.
Cumulative impacts	The existing Klip Road Cemetery and other nearby burial activities already contribute to a baseline level of nutrient and microbial loading within the local groundwater system. The introduction of the proposed cemetery expansion may incrementally increase the cumulative risk of groundwater contamination, particularly given the high aquifer vulnerability and hydraulic connectivity toward Princess Vlei. However, the exclusion of the high-risk southern portion of the site adjacent to Princess Vlei and the implementation of site-specific mitigation measures (e.g., lined graves, restricted burial zones, and regular monitoring) are expected to limit additional cumulative deterioration of groundwater quality. As a result, while cumulative effects are acknowledged and potentially moderate, they are considered manageable and acceptable under the proposed mitigation and long-term groundwater protection framework.

Project phase	Operation			
Impact	Groundwater contamination due to the addition of paints and varnishes to the environment and corrosion (and liberation of metals).			
Description of impact	Contamination of the local groundwater.			
Mitigatability	High	Mitigation exists and will considerably reduce the significance of impacts		
Potential mitigation	• Standardise coffin size with ordinary dimensions. • Coffin materials should primarily consist of untreated wood and/ or other biodegradable materials. • Refrain from using excessive ornamental metals, plastics, paints, varnishes, etc. • Where possible, all jewellery, watches, batteries, excessive cosmetics, and other such materials should be removed prior to burial. It is harder to remove dentures and pacemakers. • Installation of impermeable liner beneath the cemetery to prevent the deterioration of groundwater quality.			
Assessment	Without mitigation		With mitigation	
Nature	Negative		Negative	
Duration	Short term	impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to specific isolated parts of the site
Intensity	Low	Natural and/ or social functions and/ or processes are somewhat altered	Very low	Natural and/ or social functions and/ or processes are slightly altered
Probability	Almost certain	It is most likely that the impact will occur	Likely	The impact may occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	Medium	The affected environment will only recover from the impact with significant intervention

Resource irreplaceability	Medium	The resource is damaged irreparably but is represented elsewhere	Medium	The resource is damaged irreparably but is represented elsewhere
Significance	Medium - negative		Medium - negative	
Comment on significance	The potential for groundwater contamination during the operational phase due to the addition of paints, varnishes, and corrosion-related metal leaching is rated as medium (negative) without mitigation. These substances may contain volatile organic compounds (VOCs), heavy metals (such as lead, zinc, or chromium), and other inorganic contaminants that can infiltrate the shallow, highly permeable unconfined aquifer underlying the site. If uncontrolled, these pollutants could degrade groundwater quality, affecting both domestic and ecological receptors. Given the high aquifer vulnerability and shallow groundwater levels (<3 mbgl) identified in the Groundwater Impact Assessment, contamination could occur rapidly through infiltration, especially during rainfall events. With the implementation of mitigation measures, such as using only environmentally safe, non-toxic paints and coatings, storing all hazardous materials in sealed, bunded areas, conducting regular maintenance of structures to prevent corrosion, and ensuring appropriate waste handling and disposal, the risk of groundwater contamination can be significantly reduced. Accordingly, the impact significance decreases from medium/high (negative) to medium (negative) with proper mitigation, monitoring, and adherence to environmental management protocols.			
Cumulative impacts	Cumulatively, the potential impact of chemical and metal contamination from paints, varnishes, and corrosion products could add to existing local groundwater quality pressures, especially when considered alongside other sources such as leachate from burials and runoff from adjacent land uses. Given the highly permeable soils and sensitive hydrogeological setting, even small, repeated releases over time could contribute to the gradual accumulation of trace metals and organic pollutants within the shallow aquifer. However, provided that the proposed development adheres to strict chemical handling and waste management procedures, and that routine groundwater quality monitoring is conducted, the cumulative impact is expected to remain low to moderate in significance and manageable. The incorporation of these preventative measures within the Environmental Management Programme (EMPr) will be essential to ensuring that no long-term or irreversible degradation of groundwater quality occurs.			

Project phase	Operation			
Impact	Potential leaching of chemicals used in the embalming process (e.g. formaldehyde and associated compounds) into the groundwater.			
Description of impact	Contaminated groundwater.			
Mitigatability	High	Mitigation exists and will considerably reduce the significance of impacts		
Potential mitigation	When formaldehyde comes into contact with water it tends to breakdown into methanol, amino acids and several other chemicals and therefore does not persist in the environment (World Health Organisation, 2002). However, these compounds can persist in saturated conditions (Dippenaar et al., 2018).			
Assessment	Without mitigation		With mitigation	
Nature	Negative		Negative	
Duration	Short term	impact will last between 1 and 5 years	Brief	Impact will not last longer than 1 year
Extent	Limited	Limited to the site and its immediate surroundings	Very limited	Limited to specific isolated parts of the site

Intensity	Low	Natural and/ or social functions and/ or processes are somewhat altered	Very low	Natural and/ or social functions and/ or processes are slightly altered
Probability	Almost certain	It is most likely that the impact will occur	Likely	The impact may occur
Confidence	Medium	Determination is based on common sense and general knowledge	Medium	Determination is based on common sense and general knowledge
Reversibility	Medium	The affected environment will only recover from the impact with significant intervention	Medium	The affected environment will only recover from the impact with significant intervention
Resource irreplaceability	Medium	The resource is damaged irreparably but is represented elsewhere	Medium	The resource is damaged irreparably but is represented elsewhere
Significance	High - negative		Medium - negative	
Comment on significance	The potential for groundwater contamination from embalming chemicals such as formaldehyde, methanol, and phenol is rated as high significance (negative) without mitigation due to their toxicity, mobility, and persistence in the shallow, unconfined sandy aquifer. These chemicals could infiltrate groundwater and affect nearby users and ecosystems, including Princess Vlei. With mitigation measures, such as limiting the use of harmful embalming fluids, ensuring graves are placed where the water table exceeds 2.5 m, using impermeable linings, implementing groundwater monitoring, and enforcing regulated embalming practices, the impact can be reduced to medium significance (negative).			
Cumulative impacts	The cumulative impacts of soil disturbance and instability from the proposed cemetery expansion, while individually assessed as low and manageable, may become more significant when considered alongside other developments in the surrounding area. Repeated excavation, vegetation clearance, and compaction activities can gradually degrade soil structure, reduce natural infiltration capacity, and increase susceptibility to erosion. Over time, this may contribute to a broader decline in soil health, particularly if similar land-use changes occur nearby without co-ordinated rehabilitation efforts. Additionally, disturbed soils across multiple sites can create favourable conditions for the spread of alien invasive plant species, which further alter soil composition and ecological function.			

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	Provide a summary of the findings and impact management measures identified by all Specialist and an indication of how these findings and recommendations have influenced the proposed development.
<u>Aquatic Compliance Statement (Biosphere Enviro Solutions, 2025):</u> The aquatic compliance assessment confirms that the proposed site does not overlap with any watercourses or wetlands, indicating no direct implications under the National Environmental Management Act (NEMA) or the National Water Act (NWA). The development footprint is situated beyond the 100-metre buffer zone of the Diep River. Although it falls within the broader 500-metre regulated buffer zone for wetlands, the site's physical separation from nearby features, such as the floodplain and depression (Princess Vlei), combined with the already degraded nature of the proposed site, suggests a low likelihood of impact. However, two potential indirect impacts were identified: - Stormwater runoff management (due to its location within a Strategic Water Source Area, but the presence of compacted surfaces, separation from nearby watercourses, and limited hydrological change from added impervious areas help minimise potential runoff impacts) and - Groundwater contamination (due to decomposition products, although site-specific factors like low vulnerability, limited soil infiltration, and distance from surface water features help reduce this risk) The only environmental concerns relate to stormwater and groundwater, both of which are considered to pose low significance and can be mitigated. These findings have informed the inclusion of appropriate stormwater management and pollution prevention measures in the construction phase to ensure minimal environmental impact.	

The Aquatic Compliance Statement is attached as **Appendix G1**.

Terrestrial Compliance Statement (Biosphere Enviro Solutions, 2025):

The following results were observed:

- There are no CBAs or ESAs overlapping the project site;
- Project area is not located in a PA or NPAES focus area;
- Project area is not located in an important bird area; and
- The project area is located broadly in a nationally threatened ecosystem, namely the Cape Flats Sand Fynbos which is considered critically endangered.

Despite its location within a threatened vegetation type, the site visit confirmed that the site is already highly degraded and altered, which significantly reduces its ecological value. As a result, the proposed cemetery expansion is expected to have an insignificant impact on terrestrial biodiversity.

The Terrestrial Compliance Statement is attached as **Appendix G2**.

Landscape and Visual Impact Assessment (Create, 2025):

The findings of the Visual Assessment on the proposed development are as follows:

- Similar type of infrastructure on the adjacent site (extension of the existing cemetery). The proposed infrastructure is not a dominant and significant component in the landscape and blends in well with existing urban forms, colours and textures. It therefore achieves a visual congruence to the surrounding environment;
- The greatest negative landscape and visual impacts, albeit still minor – negligible will be during the construction phase which are temporary;
- The small visual envelope due to the nature of the development (a cemetery with no significant height);
- The dispersed dense tree stands, tree lined avenues and built infrastructure offer sufficient screening from most areas within the study area (except for residents residing directly next to the site). It is anticipated that no other sensitive stationary receptors will be directly affected;
- The greater Cape Flats area has historical and cultural significance; however, the specific site is derelict, and the extension of the existing cemetery will enhance the overall visual quality within the immediate vicinity of the residential areas, especially while traveling along Prince George Drive;
- As per the DSDF the existing parcels of land can be categorised as underutilised vacant land and typical identified threats include illegal sand mining and dumping (especially in or near critical biodiversity areas) and illegal informal land occupation. The proposed extension of the cemetery can alleviate some of these pressures as the proposed reactivation of underused spaces will most likely prevent unesthetic and illegal land uses on the verge of Prince George Drive and Klip Road; and
- Due to the urban context long expansive views towards the site is limited.

The proposed project does not negatively impact on landscapes of significant symbolic, aesthetic, cultural and historical value. The Landscape and Visual Impact Assessment is attached as **Appendix G3**.

Agricultural Compliance Statement (Soilza, 2025):

The agricultural compliance statement found that the proposed development is acceptable because it leads to no loss of future agricultural production potential.

The agricultural assessment also disputes the high sensitivity classification of the assessed area by the screening tool and rates the entire assessed area as being of medium agricultural sensitivity.

Although the climate and terrain may allow for viable crop production, other factors constrain the potential of the site to practically deliver agricultural produce and therefore limit its agricultural production potential. These factors include:

- its location, which has been transformed by expanding urbanisation, leaves it surrounded largely by non-agricultural land uses;
- The fact that land use planning in the spatial development framework designates the site for non-agricultural use; and
- Municipal ownership of the land which would also discourage the necessary investment to establish cropland.

Therefore, it was concluded that the site will never be viably utilised for agricultural production and its potential is therefore assessed here as non-existent.

The Agricultural Compliance Statement is attached as **Appendix G4**.

Groundwater Impact Assessment (GEOSS, 2023):

The findings from the groundwater impact assessment are as follows:

- Several small-scale groundwater users are present, especially in residential areas north of the site;
- Groundwater abstraction likely occurs from the secondary fractured aquifer, as the primary aquifer is unproductive for large-scale use;
- The primary aquifer is perched and has limited connectivity with the deeper fractured aquifer;
- Borehole samples down-gradient of the cemetery show ideal to good water quality, indicating no historical contamination from cemetery activities;
- Groundwater quality in the area falls within the ideal range (0–70 mS/m);
- The primary aquifer is highly vulnerable to surface contamination due to its sandy, permeable nature;
- Any contamination would likely follow the groundwater flow direction (southeast to northwest), toward the Hout Bay River;
- Grave sites were used as trial pits; all observed graves (2m deep) were dry;
- Surface soils consist of dry, unconsolidated, fine- to medium-grained sand with small quartz grains and occasional roots;
- Historical data shows the water table in the primary aquifer is deeper than 2m below ground level; and
- The proposed cemetery extension is at a higher elevation, suggesting an even deeper water table beneath the new area.

While the cemetery is a potential source of contamination, the depth of the water table (more than 1m below burial depth) breaks the source-pathway-receptor link. Therefore, the overall risk to groundwater resources is considered low. Despite the low risk, appropriate screening measures must be implemented to prevent any impact on the aquifer. The assessment concluded that the site is suited for use as a cemetery, given the lack of shallow groundwater.

The Groundwater Impact Assessment is attached as **Appendix G5**.

Traffic Impact Statement (Zutari, 2024):

The traffic impact statement showed that:

- The proposed extension of the cemetery will generate a maximum of 77 trips on a Saturday;
- Existing access routes will be maintained and a new vehicular access route will be opened on Klip Road;
- There are 85 parking bays provided;
- There is adequate taxi route provision along roads in the vicinity of the development;

Considering that the extended portion of the cemetery will only generate 77 trips the impact the extension has on the road network is negligible. The existing road network has sufficient capacity to accommodate the additional trips.

The Traffic Impact Assessment is attached as **Appendix G6**.

Heritage and Palaeontology (2024):

A Heritage Practitioner conducted a screening assessment on the site and proposed development. A Notice of Intent to Develop (NID) has been completed in terms of Section 38 of the NHRA. A NID (case no: HWC24040804EJV0417) was submitted to Heritage Western Cape (HWC). A record of decision from HWC was received on 08 July 2024, wherein the applicant was notified that a Heritage Impact Assessment (HIA) is required under section 38 of the NHRA. Potential impacts on heritage resources can occur during construction due to earthworks. A Chance Find Protocol outlines the procedures to be followed in the event that a heritage resource is uncovered.

A Heritage and Palaeontological screening assessment is attached as **Appendix G7**.

Socio-Economic Impact Assessment (SEIA) (Urban-Econ,2025):

The socio-economic impact assessment found that the proposed expansion of Klip Road cemetery presents an opportunity to address both immediate and future burial needs. The project is expected to create several positive impacts during the construction and operational phases, i.e., local procurement, employment, household income, burial space, etc. However, there are potential negative impacts related to traffic, dust, and visual disturbances, which could affect the quality of life for local residents. These impacts can be carefully managed to ensure minimal disruption to the community.

The proximity to the existing cemetery allows for efficient utilisation of resources and infrastructure, minimizing the need for new construction and reducing potential environmental disruption. While site alternatives were not considered, due to the lack of suitable undeveloped City-owned land in the area, the proposed site aligns well with the city's broader spatial development goals.

Overall, the assessment concluded that the proposed development is seen as appropriate and feasible from a socio-economic perspective. The benefits of the expansion, including job creation, improved access to burial services, and better planning for future generations, outweigh the potential negative impacts. As such, the expansion of the Klip Road cemetery should be authorised, with appropriate mitigation measures. A Socio-Economic Impact Assessment is attached as **Appendix G8**.

Stormwater Management Plan (Graeme McGill Consulting, 2024):

The sustainable drainage systems (SuDS) methodology as required by the City of Cape Town stormwater policies, has been applied to the sub catchments of the development site in the Stormwater Management Plan. In order to design the quality treatment component of the stormwater system according to SuDS principles the following standards have been applied:

- The 24hr duration 1:0.5-year storm Water Quality Volume (WQv) is to be treated.
- Suspended solids (SS): 80% reduction.
- Total phosphorous concentration (TP): 45% reduction.

The site is divided into three sections which are mostly undeveloped with some existing paved parking areas or housing. Existing services such as water mains, sewage and electrical services are found on site. Estimates of the pre-development runoff have been computed for a range of recurrence intervals. The permitted peak outflow from the site is limited to these of the pre-development peaks. The runoff for the different sections are to be attenuated by using vegetated swales and is to be discharged into the existing stormwater system via a proposed manhole located on erf RE/75567_pt1, and the proposed stormwater connection crossing (M5) Prince George Drive.

The runoff water quality objective (80% reduction of TSS and 45% reduction in TP for the WQv) is achieved with the use of in-situ material in the vegetated swales. Maintenance forms an integral part of the sustainability of the stormwater management plan. A plan (operation and maintenance manual/schedule) has been compiled for the site as part of the Stormwater Management Plan.

The proposed stormwater management system should be fully implemented when the extension is undertaken. The Stormwater maintenance schedule as recommended in the Stormwater Management Plan must be implemented. Stormwater Management Plan is attached as **Appendix G9**.

2.	List the impact management measures that were identified by all Specialist that will be included in the EMP
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Aquatic Compliance Statement (Biosphere Enviro Solutions, 2025):

Though impacts are assessed as low significance, the following mitigation measures should be implemented:

Construction Phase:

- Implement standard dust control measures;
- Ensure proper management of construction waste; and
- Follow municipal requirements for stormwater management during construction.

Operational Phase:

- Design cemetery layout according to standard best practices;
- Comply with municipal stormwater requirements for the catchment; and
- Maintain site drainage patterns that direct water away from the road reserve boundary.

Terrestrial Compliance Statement (Biosphere Enviro Solutions, 2025):

Due to the degraded and altered nature of the site, any potential impact that could arise would fall within an insignificant category (i.e. Very Low possible impact). However, the following general management actions were proposed to mitigate any potential damage:

- Limit all construction and operational activities to the smallest footprint;
- Implement industry best practice standards for preventing and managing potential hydrocarbon pollution from spills;
- Restrict vegetation and soil removal to areas where it is strictly necessary; and
- Monitor disturbed soils regularly for the emergence of alien invasive plant species and apply appropriate control measures in accordance with an Alien Invasive Plant Species Management Plan.

Landscape and Visual Impact Assessment (Create, 2025):

Proposed mitigation guidelines and visual enhancement from the specialist:

- The construction period should be minimized to the minimum extent possible in order not to cause unnecessary and ongoing visual intrusion for nearby communities/residents;
- Make use of existing cemetery access gates during the construction phase;
- Construction signage should not be obtrusive and must be placed with caution in strategic locations as required;
- The Contractor shall ensure ongoing housekeeping to maintain a tidy construction area, this includes the timeously removal of rubble which should be dumped at a registered facility;
- Material laydown area/s must be placed in an area where existing vegetation and/or built structures are able to provide the most effective screening (existing parking area next to Klip Road);
- Retain all trees along Klip Road;

- Retain existing trees along De Waal Road, between the northern parking area and the existing cemetery;
- In order to create a seamless visual flow, the concrete palisade fence must be replaced with a clear mesh fence in the required/new position. If it cannot be removed, hedge type vegetation (or larger shrubs) must be planted next to (and in conjunction) with the concrete palisade fence;
- New trees (in areas where there are no mature trees) and formal landscaping must be implemented around the periphery of the proposed cemetery (refer to bullet point below)
- Keep a 3m green buffer strip between the proposed extended cemetery area and main roads. This 3m buffer strip should include a dedicated pedestrian walkway;
- Retain a dedicated safe parking space close to the existing main gate or as practically feasible;
- There are two options with regards to architectural style of existing structures. It should either be re build or replaced to fit in with proposed new structures (which most likely will have a more modern architectural style) or; new structures must fit in with the architectural style of the existing structures, if the latter is the case, then maintenance on existing structures will be required in order to establish a coherent architectural style.

Agricultural Compliance Statement (Soilza, 2025):

There were no mitigation measures proposed for agricultural protection as the site is not viable for agricultural production.

Groundwater Impact Assessment (GEOSS, 2024):

The following recommendations are made:

- The burials of bodies should only take place where the water table is more than 4 mbgl. This is a proposed mitigation measure;
- It is recommended that boreholes should not be used for potable consumption within 350m of the established cemetery;
- Where possible, ensure burial occurs sufficiently above water table depth to enable natural attenuation in the vadose zone (region between surface and water table);
- Installation of impermeable liner beneath the cemetery to prevent the deterioration of groundwater quality;
- Limit groundwater use of the shallow aquifer immediately downgradient/ downstream of the site;
- Install appropriate stormwater management systems to direct uncontaminated stormwater off-site;
- Monitoring wells are required in order to detect any potential contamination as quickly as possible;
- Standardise coffin size with ordinary dimensions;
- Coffin materials should primarily consist of untreated wood and/ or other biodegradable materials;
- Refrain from using excessive ornamental metals, plastics, paints, varnishes, etc;
- Where possible, all jewellery, watches, batteries, excessive cosmetics, and other such materials should be removed prior to burial. It is harder to remove dentures and pacemakers;
- Installation of impermeable liner beneath the cemetery to prevent the deterioration of groundwater quality; and
- Establishment of a cemetery is not recommended within 200m of a wetland.

Traffic Impact Statement (Zutari, 2024):

The objective of the Traffic Impact Statement was to determine if the impact that the proposed extension of the cemetery would have on the surrounding road network. The following is recommended:

- It is recommended that the City proposes hard or soft infrastructure measures to accommodate the growth of the background traffic especially on the intersection between Klip Road and Victoria Road since the development has a minimal impact on the current service levels of the intersection.
- Stagger funerals services, to avoid too many funeral services occurring in a short amount of time. This will alleviate some traffic from the surrounding road network on days which funerals take place, when the development generates/produces the majority of its trips. Funerals should be staggered such that parking can accommodate the number of vehicles that will park for the funeral to avoid vehicle overflowing into Klip Road.

Socio-Economic Impact Assessment (SEIA) (Urban-Econ,2025):

The assessment highlighted that the following measures be mitigated during the different stages of the project:

Construction:

Dust:

- Implement dust suppression measures, such as regular water spraying, covering stockpiles, and limiting work during windy conditions.

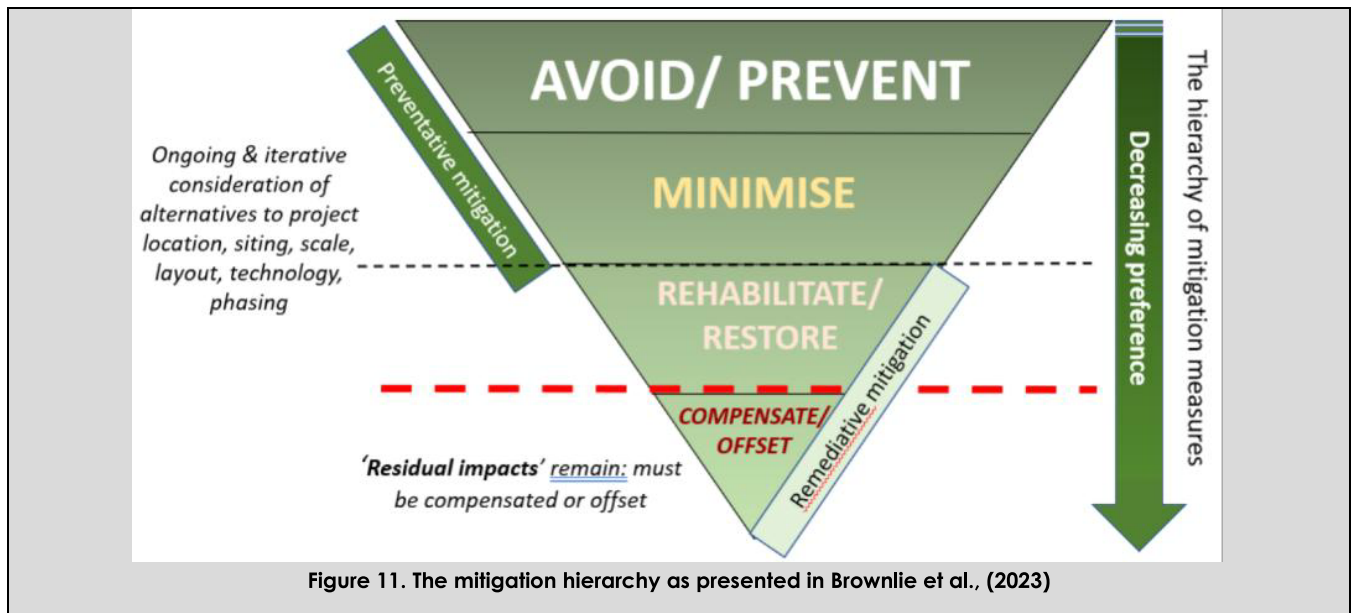
Traffic congestion:

- Implement traffic management strategies, including scheduled deliveries and clear signage to reduce disruption.

Sense of place:

- Site management to reduce dust and visual clutter;
- Screening of construction areas wherever possible to limit visibility and disturbance;

- Implementing phased construction helps minimise the area disturbed at any one time, reducing the overall environmental and visual impact; and - Additionally, the prompt removal of construction debris ensures a cleaner and safer site, contributing to better overall site conditions throughout the project. <u>Operational:</u> Traffic congestion: - Implement a comprehensive traffic management plan, including the provision of adequate, accessible off-street parking. Sense of place: - Sensitive landscaping should be used to help integrate the cemetery into the surrounding environment, creating a respectful setting; - The use of appropriate materials and design elements further enhances visual harmony with the local context; and - Ongoing maintenance of the cemetery to standard to ensure its appearance remains orderly over time.	
3.	List the specialist investigations and the impact management measures that will not be implemented and provide an explanation as to why these measures will not be implemented.
There are no specialist impact management measures that will not be implemented. All mitigation measures provided by the specialists are reasonable and practical.	
4.	Explain how the proposed development will impact the surrounding communities.
The proposed development is expected to have a positive impact on surrounding communities by creating temporary employment opportunities during both construction and operational phases, supporting local businesses through the sourcing of materials, and providing much-needed burial space to meet future community needs.	
5.	Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.
6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.
There are no conflicting recommendations between the specialists.	
7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.
All specialist findings and recommendations have been in the favour of the proposed development with some noting minor to negligible negative impacts that could be mitigated. These mitigation measures have been incorporated into the EMPr.	
8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.
The mitigation hierarchy provides for a series of successive steps to address impacts, with each step being implemented only once the previous option has been exhausted. The desired outcome of applying the mitigation hierarchy is to ensure that there is no loss of biodiversity, negativity impacts and risks are avoided. The mitigation hierarchy was applied in the following manner for the proposed project: Avoidance: Avoidance was not a viable option for this project due to the urgent need for additional burial space in the City of Cape Town. The expansion of the existing Klip Road cemetery was identified as a practical solution, given the availability of suitable open land adjacent to the current site. Minimisation and rehabilitation: when avoidance is not possible, efforts must be made to minimise negative impacts and to rehabilitate or remediate affected areas to reduce residual impacts. The recommendations and guidelines of all the specialist reports were incorporated to mitigate any negative impacts. Compensate/ offsetting: the impacts of the proposed Klip Road cemetery expansion could be mitigated to have low impacts on the environment. Therefore, compensating/offsetting is not required for this development.	



SECTION J: GENERAL

1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA.
Aquatic:	- No direct impact to surface water resources - The wetlands are physically separated from the proposed development site. This limits the potential for any impact to the wetlands. - Good construction practice mitigation measures are recommended (e.g. dust control measures, proper waste management and stormwater management) - The proposed site is suitable for the cemetery expansion
Terrestrial:	- There are no CBAs, ESAs or PAs that overlap the proposed site - There are no plant or animal species of special concern observed on site - There are existing alien invasive species on site (<i>Acacia longifolia</i>) - The site is already highly degraded by degraded grasslands, no natural vegetation or tree lines - Good construction practice mitigation measures are recommended (e.g. limiting development footprint, avoid unnecessary removal of vegetation, etc.) - The proposed site is suitable for the cemetery expansion
Groundwater:	- An unconsolidated intergranular aquifer is found beneath the proposed site. - A section of the original layout was excluded from development due to the elevated risk of groundwater contamination affecting the floodplain connected to Princess Vlei. - A clay-rich material lining is recommended for the bottom of the grave to prevent contamination of groundwater. - At least three monitoring wells should be installed across the site. - Quarterly quality monitoring of the groundwater is recommended. - A geotechnical specialist be enlisted. - The new proposed site is suitable for the cemetery expansion.
Landscape and Visual:	- Temporary negligible negative impacts are expected during the construction phase. - If the development is approved, the impact and change in landscape character of the proposed site within the study area will be positive by the formalisation of the derelict sections of land. After construction, the site will look similar to the adjacent cemetery creating unison. - All impacts can be mitigated during the construction phase. - The overall landscape and visual impacts are considered positive during the operational phase. - The proposed site is suitable for the cemetery expansion.

Heritage and Palaeontology: - Should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and HWC must be notified without delay. Traffic: - The proposed extension of the cemetery will generate approximately 77 trips on a Saturday – this is the maximum number of trips the cemetery is expected to generate. - Existing access routes will be maintained and a new vehicular access route will be opened on Klip Road. - There are 107 parking bays provided. - It is recommended that the City proposes hard or soft infrastructure measures to accommodate the growth of the background traffic especially on the intersection between Klip Road and Victoria Road since the development has a minimal impact on the current service levels of the intersection. - Funerals should be staggered such that parking can accommodate the number of vehicles that will park for the funeral. To avoid vehicle overflowing into Klip Road. - The Traffic Impact Assessment (TIA) supports the extension of the development. Socio-economic: - There are several positive impacts arising from the proposed development such as employment opportunities and sourcing materials from local suppliers thereby supporting the local economy. - Dust, sense of place and traffic impacts have been identified during the construction phase but can be easily mitigated. - The overall impact of the expansion is expected to outweigh any negative impacts.	
1.2.	Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)
Please see attached Appendix B2	
1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.
Positive: • There is a burial shortage across the City of Cape Town and additional burial sites are needed to accommodate the growing population. • There are limited sites available for the development of a cemeteries in Cape Town. Expanding the existing Klip Road Cemetery was identified to be suitable it terms accessibility. • The proposed site has no significant environmental sensitives making it suitable for the development. • The applicant is committed to implementing the recommended mitigation measures. • There will be removal of the existing alien invasive species on site. • Job creation during the construction and operational phase of the cemetery. Negative: • There is potential for alien invasive species to spread and establish due to soil disturbances. • There is potential for stormwater runoff. • There is potential for groundwater contamination If the proposed mitigation measures are not implemented.	

2. Recommendation of the Environmental Assessment Practitioner (“EAP”)

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr
All of the mitigation measures and recommendations provided by the specialists will be included in the EMPr. They have been broadly summarised below as outcomes. Construction: • An independent Environmental Control Officer (ECO) must be appointed for the duration of the construction phase and must carry out the responsibilities of that role as defined in the EMPr. • The disturbance footprint should be kept at a very small footprint. • All general waste collected on site must be disposed of at a licensed general waste disposal site. • All hazardous waste generated on site must be placed in a temporary impermeable bunded containment area which must be disposed of at a hazardous landfill site or be collected by the appropriate service provider. • Concrete and cement mixing must take place on an impermeable surface, and dried waste concrete and cement must be disposed of with building rubble. • The Contractor shall ensure ongoing housekeeping to maintain a tidy construction area. • Keep topsoil stockpile separated from subsoil stockpile.	

	• Keep stockpiles away from stormwater drain to prevent runoff and sedimentation. • Store fuels and chemicals on impermeable, bunded surfaces with effective containment. • Make use of the existing road entrance road and existing cemetery parking. • Ensure pathways and grave areas are not acting as channels for concentrated water flow—redirect water where necessary. • During construction: Materials used during construction must be sourced and transported responsibly to minimise the risk of introducing new invasive plants. • Materials and soils etc. used on the site that have been sourced elsewhere must be properly checked / cleaned or responsibly sourced to prevent the transfer of invasive seeds or plant material. • Topsoil to be checked before backfilling to ensure no alien invasive species seeds. • Post-construction: Stabilise disturbed soils promptly with native vegetation. Operation: • Effective management must be provided for by the City for the duration of the operational phase and must ensure all activities respect the measures in the EMPr and other specialists' recommendations. • Regular inspection of stormwater infrastructure to ensure it remains free flowing into designated areas. The Stormwater maintenance schedule as recommended in the Stormwater Management Plan must be implemented. • Planting of trees to reduce visual intrusion to adjacent residential land users. • Rehabilitation of impacted areas and removal of all old infrastructure. • With regards to safety, ensure an impermeable parameter fence, regular patrols by security guard and control of persons entering. • Implement Alien Invasive Species Management Plan.
2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.
The assessment of construction-phase impacts is conditional upon the implementation and monitoring of the construction EMPr. Similarly, the assessment of operational-phase impacts depends on the implementation and monitoring of the operational EMPr. These requirements, however, are standard conditions of the EA that EMPs must be implemented.	
2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.
Based on the findings of this Basic Assessment and of the specialist studies, it is the opinion of the EAP that there are no negative impacts that should be considered as "fatal flaws" from an environmental perspective. The development is expected to have an overall negligible to low impact on the environment, and therefore there is no reason it should not be authorised. As discussed in the main body of this BAR, the negative impacts during construction can be mitigated to mostly low significance. Furthermore, the assessed project benefits outweigh negative impacts, and the project is anticipated to make a positive contribution towards the community. The proposed development addresses a social need, is consistent with municipal and provincial planning, and does not result in environmental opportunity costs or unacceptable degradation of sensitive natural systems. The proposed activity should be authorised for the following reasons: • There is a burial shortage across the City of Cape Town and additional burial sites are needed to accommodate the growing population. If the development is not authorised, the CoCT will face further strain on identifying suitable land for cemeteries. • There are limited sites available for the development of a cemeteries in Cape Town. Expanding the existing Klip Road Cemetery was identified to be suitable in terms of accessibility. • The proposed site has no significant environmental sensitivities making it suitable for the development. • The applicant is committed to implementing the recommended mitigation measures. Provided that the specified mitigation measures are applied effectively, it is recommended that the project should receive Environmental Authorisation in terms of the 2014 EIA Regulations, as amended, subject to the following conditions: • That the proposed cemetery layout discussed in this report is authorised, including all its associated infrastructure; • The Environmental Management Programme (EMPr) forming part of this Basic Assessment Report must be implemented during the design, construction and operational phases of the development; • Post-construction groundwater monitoring must be implemented in line with the recommendations of the Groundwater Impact Assessment; • An independent Environmental Control Officer (ECO) must be appointed for the duration of the construction phase and must carry out the responsibilities of that role as defined in the EMPr; • Effective management must be provided for by the City for the duration of the operational phase and must ensure all activities respect the measures in the EMPr and other specialists' recommendations; • The Stormwater maintenance schedule as recommended in the Stormwater Management Plan must be implemented.	
2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.

- It is assumed that the information on which this report is based (project information as well as existing information) is correct, factual and truthful.
- It is assumed that all the relevant mitigation measures and agreements specified in this BAR and the accompanying Environmental Management Programme (EMPr) will be implemented in order to ensure minimal negative impacts and maximum environmental benefits.
- It is assumed that Stakeholders and Interested and Affected Parties notified during the public participation process will submit all relevant comments within the designated review and comment period.
- It is assumed that the recommendations provided by the specialists will mitigate any harmful effects on the environment, including groundwater, freshwater and soil contamination. This will be determined with the regular monitoring practices recommended in the EMPr (Appendix H).

The following assumptions and limitations were identified from the various specialist studies:

Assumptions and limitations from the Aquatic Compliance Statement:

- Due to the scarcity of biotopes and water resources, the implementation of aquatic methodologies proved to be impractical. Consequently, it is assumed that the selected sample sites for the aquatic assessment effectively represent the broader aquatic conditions in the project area. It is further assumed that the environmental conditions during the study period are typical of the broader conditions in the semi-arid environment.
- The concrete drainage channel that discharges into the Princess Vlei wetland is primarily fed by stormwater originating near the Royal Cape Golf Club. Sampling within this channel was not feasible due to the complete blockage by invasive water hyacinth (*Eichhornia crassipes*) and the channel's concrete construction, which prevents effective aquatic sampling and ecological assessment.
- The open field to the northeast of the cemetery, currently utilised as a football field, and the area further east where potential wetland conditions were observed, are heavily impacted by anthropogenic activities. No wetland characteristics were identified in these areas. Additionally, severe pollution surrounding the Kliproad cemetery contributes to the overall degradation of the local environmental conditions.
- The absence of site-specific data posed challenges in determining the Present Ecological Status (PES) directly for the project site. Therefore, the PES of the broader catchment was considered as a proxy. During the cemetery expansion, it is recommended that appropriate measures be implemented to prevent any potential spillages that could affect the Princess Vlei wetland. However, the likelihood of such an impact occurring is considered low.
- The desktop component of this assessment utilized the most recent and relevant data sources available. However, it is important to note that these datasets typically cover a broader spatial scale, focusing on the entire catchment area rather than the specific project site. Based on the available information, no significant impacts on the aquatic ecosystems are anticipated, and the cemetery expansion is expected to proceed without causing substantial long-term harm to the receiving environment.

Assumptions and limitations from the Terrestrial Biodiversity Compliance Statement:

- In order to obtain a comprehensive understanding of the dynamics of the biodiversity of the study area, surveys should ideally be replicated over several seasons and over a number of years. However, due to project time constraints such long-term studies are not feasible. This survey was conducted during February 2025 which is not the ideal flowering period. Nevertheless, adequate rainfall has occurred during the current summer period to allow for sufficient growth.
- Since environmental studies deal with dynamic natural systems, additional information may come to light at a later stage.
- Despite these limitations, a comprehensive desktop study was also conducted, in conjunction with the detailed results from the current survey, and as such there is a high confidence in the information provided.
- Floral identifications of each species on site were documented and were confirmed with family experts located at SANBI.

Assumptions and limitations from the Landscape and Visual Assessment:

- During the time of writing this report a proposed detailed cemetery layout was not available, however assumptions were made on general industry standards, the existing adjacent cemetery and experience in the field of Landscape Architecture and Landscape and Visual Impact Assessment;
- Determining a visual resource in absolute terms is not achievable. It is a complex procedure since it is determined through a combination of quantitative (visibility) and qualitative (aesthetic value) criteria. Therefore, a visual assessment cannot be entirely objective in this sense. Individuals will evaluate a landscape differently, based on experience, cultural, and social background;
- Various factors can enhance or reduce the visual impact of the proposed project, for instance, vegetation near a receptor's view of the proposed project. Other factors include weather, climatic conditions, and seasonal change. Therefore, it is difficult to determine the visual impact of the proposed project from the viewpoint of each receptor; and
- No specific national legislation for visual assessments currently exists in South Africa. However, the assessment of visual impacts is required by implication when the provisions of relevant acts governing environmental management are

considered and when certain characteristics of either the receiving environment or the proposed project indicate that visibility and aesthetics are likely to be significant issues and that visual input is required (Oberholzer, 2005).

Assumptions and limitations from the Groundwater Impact Assessment:

- Available data was sourced from the relevant groundwater databases and sources. The aquifer vulnerability, yield and quality data is predominantly accurate, albeit mapped at a regional scale;
- At the time of the report, no available site development plan was available and a general assessment was conducted of the demarcated properties to determine the potential impact on groundwater resources in the area;
- A further limitation was the temporal nature of the site visit. The field work was undertaken on a single day in June 2024, and does not account for the temporal variability of the water table, i.e. the shallow water table. Due to the nature of the geology and the topography (gently relief and highly permeable, thick sand cover which promotes relatively high rates of infiltration), it is anticipated that the water table will become shallower during the wet season.
- It is possible that there are a greater number of groundwater users in the area than what has been reported in this study as not all groundwater use tends to be registered, particularly when small volumes are used for domestic purposes.

2.5. The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

1. Construction should commence within five (5) years from date of authorisation.
2. Construction should be concluded at least ten (10) years from commencement.
3. Post construction monitoring requirements should be concluded within three (3) months of the construction phase. Groundwater quality monitoring (as recommended in the Groundwater Impact Assessment) should continue until at least one (1) year after the last burial in the extension area.

3. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.

Where possible, non-potable water will be used for construction purposes, such as dust suppression and cement mixing. Due to the small scale of the construction activities, it is not anticipated that significant volumes of water will be required. Municipal water will be used for domestic drinking purposes and to operate the new toilet facilities during the operational phase. This water demand is expected to be low because funeral activities primarily take place on weekends. Additionally, water may be used for irrigation during operation.

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.

All waste, including building rubble and recyclables, will be removed from the site and taken to appropriately licensed facilities authorised to handle such waste and with sufficient capacity to accept it. During the operational phase, only negligible volumes of general waste are expected. Since this project is an extension of the existing cemetery, waste collection will be incorporated into the municipal collection schedule for the Hout Bay cemetery.

5. Energy Efficiency

8.1. Explain what design measures have been taken to ensure that the development proposal will be energy efficient.

Given the modest scale of construction, primarily limited to internal roads, parking, new guard house, church, ablution facilities, stormwater infrastructure, the scope for energy-efficient design measures is relatively constrained. Nonetheless, several practical strategies have been proposed to minimise energy consumption and environmental impact:

- Labour-Intensive Construction Methods: The greatest potential for energy savings lies in maximising the use of manual labour for tasks that do not require electrical machinery. This approach not only reduces energy demand but also helps limit noise and air pollution on site.
- Supplementary Power Supply: During construction, generators could be used to augment the existing Eskom power supply, ensuring continuity while managing energy use efficiently.
- Efficient Appliances and Lighting: Energy-efficient appliances and LED lightbulbs could potentially be installed where practicable. The use of daylight-saving lighting throughout the facility can contribute to electricity savings of up to 15%.
- Material Recommendations: Although the development is simple and not expected to incorporate advanced energy strategies, the use of green building materials (where practical) is recommended to further enhance sustainability.

Although the project does not allow for many energy-saving features, the proposed measures show a clear effort to limit environmental impact within the limits of what is possible.

SECTION K: DECLARATIONS

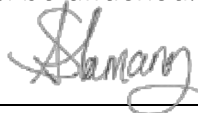
DECLARATION OF THE APPLICANT

Note: Duplicate this section where there is more than one Applicant.

I.....SIRAAJ SLAMANG....., ID number ...860406514308.....in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
 - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
 - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
 - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
 - Legitimate costs in respect of specialist(s) reviews; and
 - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.



24/10/2025

Signature of the Applicant:

Date:

City of Cape Town

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I..... XANTÉ EBERHARD....., EAP Registration number2021/3103..... as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
 - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
 - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;

Xanté Eberhardt



Signed by Xanté Eberhardt, xante.eberhardt@zutari.com
28/10/2025 11:48:36 (UTC+02:00)

28 October 2025

Signature of the EAP:

Date:

Zutari (Pty) Ltd

Name of company (if applicable):