



**SITE VERIFICATION REPORT FOR THE PROPOSED ENKANINI SOUTH HOUSING
DEVELOPMENT, ERVEN 18370 AND 18332, KHAYELITSHA AND FARM 544,
DRIFTSANDS.**

Date: July 2021

SEC REFERENCE: 020052

DEA&DP REFERENCE: N/A

1.Introduction & Legislative Context

The applicant, the City of Cape Town Municipality, proposes to develop a residential development/ housing development and associated services on Erven 18370 and 18332, Khayelitsha and Farm 544. The proposed site is approximately 4362m² in extent. Please refer to **Figure 1** to view the locality of the site.



Figure 1: Location of Erven 18370 and 18332, Khayelitsha and Farm 544, Driftsands, Cape Town, (Source: Cape Farm Mapper, 2021).

In summary, the following is proposed:

The total amount of residential erven proposed for this layout is 5700 residential erven on a 100.38ha development area. This amounts to a gross density of 57 residential erven per hectare.

It is proposed that access to Erven 18370 and 18332, Khayelitsha and Farm 544, Driftsands will be obtained from the existing Mew Way, Baden Powel Drive and Oscar Mpetha Roads.

The proposed development triggers the following Listed Activities, which is listed in terms of 2014 EIA Regulations, as amended, published under the National Environmental Management Act, Act No. 107 of 1998 (NEMA), and therefore requires an application for Environmental Authorisation:

- Listing Notice 1: Activity 12
- Listing Notice 2: Activity 15

Sillito Environmental Consulting (Pty) Ltd (SEC) has been appointed to undertake the Full Scoping EIA Process with the aim of receiving an Environmental Authorisation in terms of the 2014 EIA Regulations, as amended, published under the National Environmental Management Act (NEMA).

Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended, states that a Screening Report is required to accompany any application for Environmental Authorisation. In this regard the National web-based Screening Tool must be generated and submitted with every application.

The Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in Terms of Sections 24(5)(a) and (h) and 44 of the NEMA, dated 20th March 2020 and 30 October 2020, prescribes the general requirements for undertaking **site sensitivity verification and provides protocols for the assessment and minimum report content for environmental themes.**

These Procedures explain that prior to commencing with a specialist assessment the current use of land and the environmental sensitivity of the site identified by the National Screening Tool must be confirmed by undertaking a site sensitivity verification and the outcome of the site sensitivity verification must be recorded in the form of a report. This report therefore meets the requirements of the site sensitivity verification report outlined in the Procedures.

2. Themes & Environmental Sensitivity Identified by Screening Tool

The table below indicates the level of sensitivity of each of the themes identified in the National Web-based Screening Tool Report:

| Theme | Very High Sensitivity | High Sensitivity | Medium Sensitivity | Low Sensitivity |
|--|-----------------------|------------------|--------------------|-----------------|
| Agriculture Theme | | X | | |
| Animal Species Theme | | X | | |
| Aquatic Biodiversity Theme | X | | | |
| Archaeological and Cultural Heritage Theme | | | | X |
| Civil Aviation Theme | | X | | |
| Defence Theme | | | X | |
| Paleontology Theme | X | | | |
| Plant Species Theme | | | X | |
| Terrestrial Biodiversity Theme | X | | | |

3. Specialist Studies Identified by Screening Tool

The following Specialist Assessments have been identified by the Screening Tool:

1. Landscape/Visual Impact Assessment
2. Archaeological and Cultural Heritage Impact Assessment
3. Palaeontology Impact Assessment
4. Terrestrial Biodiversity Impact Assessment
5. Aquatic Biodiversity Impact Assessment
6. Avian Impact Assessment
7. Socio-Economic Assessment
8. Plant Species Assessment
9. Animal Species Assessment

4. Site Assessment and Determination of Site Sensitivity by EAP

Due to the security risk associated with the site, arial footage, drive by monitoring, desktop analyses and historical satellite imagery were used to assess the site and to determine the specialist assessments required. The proposed site was unoccupied until the end of 2018, where after the majority of the land was set on fire and cleared to allow for the construction of informal dwellings. Significant environmental impacts have therefore occurred since 2018, resulting in a highly disturbed and transformed site. Please refer to the figures below which indicates the loss of land since 2018, and the current condition of the site.



Figure 2: July 2018 Google Earth satellite imagery.



Figure 3: March 2021 Google Earth satellite imagery.



Figure 4: March 2021 drone imagery obtained from the CoCT Human Settlements Directorate.

Based on the site drive by, satellite- and drone imagery, it was evident that the site underwent significant environmental impacts/change since 2018. The current condition of the site can be described as transformed with limited remaining patches of indigenous vegetation. It should also be noted that the imagery provided

has been taken approximately 2 months ago. It can therefore be anticipated that the site has since been subject to further disturbance and unlawful development/ land grabs.

Several watercourses are located towards the north eastern boundary of the site. These include a dam/pan area a wetland and a possible artificial wetland. The area where that dam and wetland are located will however be excluded from the development area.

The remaining vegetation on site can be classified as Cape Flats Dune Strandveld, with an ecosystem threat status classified as Endangered.

5. Motivation by the EAP Agreeing or Disputing the Specialist Assessments Identified in Screening Tool Report, as well as the Sensitivity Ratings for the Various Themes Identified:

a) **The EAP Disputes and Agrees with the Sensitivity Ratings as Follows:**

1. Agriculture Theme

The EAP disputes the high sensitivity rating, as the proposed development site has been significantly transformed by the removal of the indigenous vegetation and establishment of an informal settlement. The site is not currently used for any significant agricultural purposes, located within a built-up area to the north and east, and not zoned for agricultural use.

2. Animal Species Theme

The EAP disputes the high sensitivity rating. The EAP is of the opinion that the Animal Species Sensitivity should be Medium to Low, as the Screening Tool Report does not account for the recent land invasion and transformation of land. It can be assumed that very limited animal species are still present in the area, as most of the vegetation has been removed by burning, which would instinctively result in the animals leaving the area.

The destruction of the terrestrial habitat would further contribute to a reduction in animal species abundance and density. Human wildlife conflict in the area may also result in less animal species occurring within the proposed area.

3. Aquatic Biodiversity Theme

The EAP disputes the very high sensitivity rating. The rating should be Medium to Low as no development is proposed within the area where the dam and wetland occurs on site. Furthermore, due to the location of the wetland and dam, it can be assumed that the wetland is prone to severe pollution and would be heavily modified. The wetland sections identified in the Screening Tool Report towards the northern boundary of the site has been completely transformed and occupied through informal settlements.

Please however note that a Freshwater Impact Study will be carried out.

4. Archaeological and Cultural Heritage Theme

The EAP agrees with the site sensitivity rating. A Notification of Intent to Develop was submitted to Heritage Western Cape, who concluded that the proposed development would have no significant heritage impacts.

5. Civil Aviation Theme and Defence Theme

The EAP disputes the high civil aviation sensitivity rating. The proposed site is located on the edge of the Khayelitsha urban area, and neighbours several residential/ settlement areas. The proposed development will have no impacts on civil aviation or defence.

6. Palaeontology Theme

7. The EAP disputes the very high site sensitivity rating. A Notification of Intent to Develop was submitted to Heritage Western Cape, who concluded that the proposed development would have no significant heritage impacts.

8. Plant Species Theme

The EAP agrees with the medium sensitivity rating. The site has been burned to clear land and most of the vegetation on site has been removed by the occupiers. A Botanical Impact Statement will however still be required.

9. Terrestrial Biodiversity Theme

The EAP disputes the very high sensitivity rating. As noted above, the site has been almost completely transformed as a result of the illegal occupiers who removed the vegetation from site and burned the veld to allow for informal housing.

It can therefore be expected that most of the habitat areas have been removed/ transformed to an extent that does not allow for wildlife to occur on the site area. Due to the transformation of the landscape and ecosystems on site, it can be presumed that the ecological functioning of the ecosystem is low and offers limited functioning.

b) The following specialist studies, as identified by the Screening Tool Report, will not be carried out:

1. Landscape Impact Assessment

Erf 511 is located in an urban area, surrounded by several other residential houses, the proposed development will therefore no change the character of the area. Landscaping will however still be carried out as a section of the site will be used for stormwater management and will require landscaping.

2. Archaeological and Cultural Heritage Impact Assessment

A Notification of Intent to Develop was submitted to Heritage Western Cape, who concluded that the proposed development would have no significant heritage impacts.

3. Palaeontology Impact Assessment

A Notification of Intent to Develop was submitted to Heritage Western Cape, who concluded that the proposed development would have no significant heritage impacts.

4. Terrestrial Biodiversity Impact Assessment

As noted above, the majority of the site area has been transformed as a result of the illegal occupiers who removed the vegetation from site and burned the veld to allow for informal housing.

It can therefore be expected that most of the habitat areas have been removed/ transformed to an extent that does not allow for wildlife to occur within the site area. Due to the transformation of

the landscape and ecosystems on site, it can be presumed that the ecological functioning of the ecosystem is low and offers limited functioning.

Confirmation will however only be provided once the Botanical Assessment has been carried out, as the habitat quality/ vegetation types on site and intactness thereof will determine the habitat quality and ecosystem functioning. It can however be assumed that the terrestrial ecosystem on site is modified and disturbed to such an extent that it offers limited ecological functioning.

5. Socio-Economic Impact Assessment

The City of Cape Town Housing Implementation branch has already conducted substantial research and consultation with the local communities and communities who will benefit from the housing development. Further community meetings and meetings with the relevant ward councillors and other councils will also take place during the course of both the EIA Application and the Town Planning Application.

It is the view of the EAP that a full Socio-Economic Impact Assessment is therefore not required.

6. Animal Species Assessment

It can be expected that very limited animal species are still present in the area, as most of the vegetation has been removed by burning, which would instinctively result in the animals leaving the area.

The destruction of the terrestrial habitat would further contribute to a reduction in animal species abundance and density. Human wildlife conflict in the area may also result in less animal species occurring within the proposed area.

Confirmation will only be provided after the Botanical Assessment has been carried out, as the habitat quality/ vegetation types on site and intactness thereof will determine the habitat quality and suitability for animal species to still occur in the area.

7. Avian Impact Assessment

The scope of the Avian Assessment states that the specialist assessment is only required to determine impacts to avifaunal species associated with the development of onshore wind energy generation facilities. The proposed development is a housing development and not an electricity generation facility.

c) The following specialist studies, as identified by the Screening Tool Report, will be carried out:

1. Freshwater Impact Assessment

2. Botanical Impact Statement

6. Conclusion

In conclusion, it is evident from the site aerial photography that the site has been significantly transformed since the start of the illegal land invasions in 2018. Although the site historically contained several environmental sensitive areas, the majority of the site is presently being occupied and has been transformed to an area that offers very little ecological functioning. At the time of compiling this report it is not possible to conclude whether an animal species and terrestrial biodiversity study will be required. Both will only be confirmed after the Botanical Assessment has been carried out.

Author of Site Verification Report

A handwritten signature in black ink, appearing to read 'E. Marais', is written over a faint, light-colored rectangular background.

Eugene Marais

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