

## SITE SENSITIVITY VERIFICATION REPORT

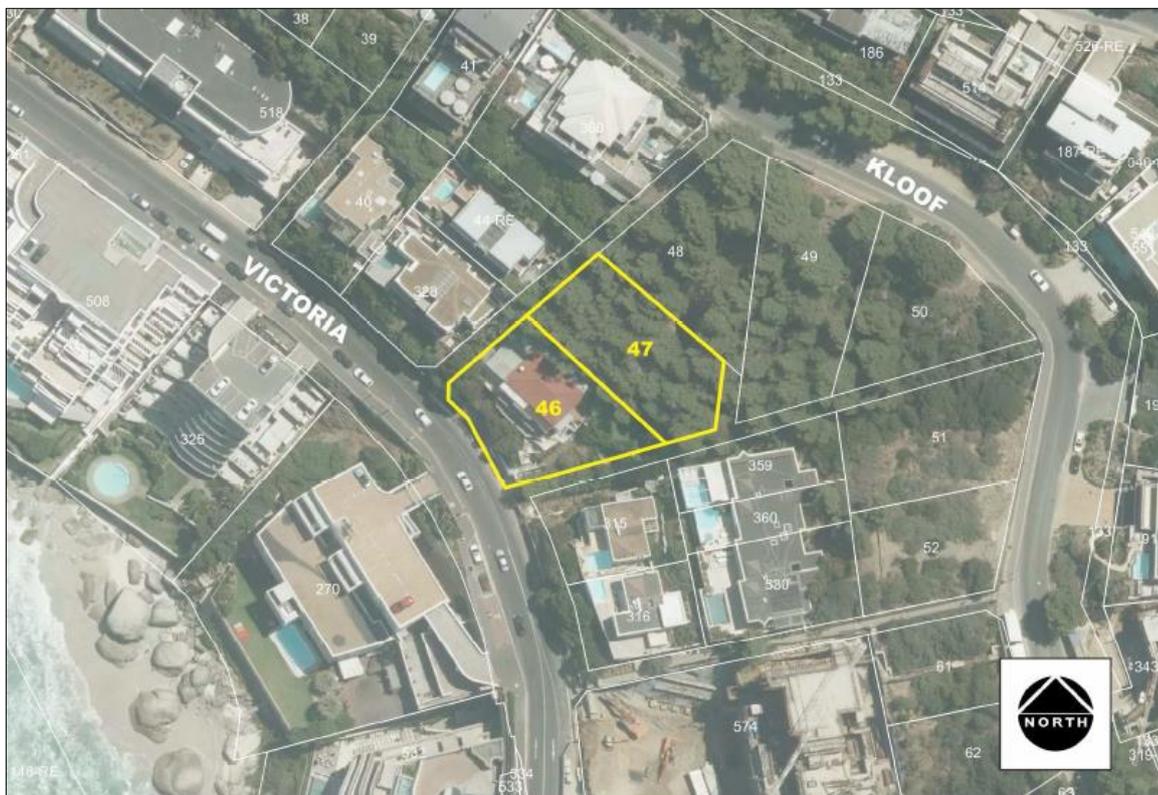
### **PROPOSED DEVELOPMENT OF AN APARTMENT BLOCK AND ASSOCIATED INFRASTRUCTURE ON ERF 46 AND ERF 47 (TO BE CONSOLIDATED INTO ERF 580), CLIFTON**

#### **INTRODUCTION AND SCOPE:**

The "Protocols for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes ("the Protocols") were promulgated in Government Notice No. 320, published in Government Gazette No. 43110 on 20 March 2020 and came into effect on 9 May 2020. The Protocols are allowed for in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA").

The Protocols must be complied with for every new application for Environmental Authorisation that is submitted after 9 May 2020. According to the Protocols, the EAP must verify the current use of the site in question and its environmental sensitivity as identified by the screening tool to determine the need for specialist inputs in relation to the themes included in the Protocols. This document serves as the Site Sensitivity Verification Report for the proposed development of an apartment block and associated infrastructure on Erf 46 & Erf 47, Clifton (as per the project description provided in the Basic Assessment Report).

The location of the proposed development is shown in the aerial image included as Figure 1 and the surrounding context is depicted in Figure 2 & Figure 3. This site sensitivity verification relates to the Screening Tool Report (STR) for the above-mentioned proposed development that comprise the project and environmental application.



*Figure 1: Aerial Image of Site which is delineated in yellow*



Figure 2: Surrounding land uses map

### SENSITIVITY VERIFICATION METHODOLOGY:

The site sensitivity verification statement was compiled by the EAP, Marielle Penwarden (Pr. EAP. 2019/1998), and is based on:

- A site visit undertaken in 18 December 2019;
- A desktop investigation using biodiversity and land use mapping tools (BGIS, Cape Farm Mapper, City of Cape Town Zoning Viewer, etc.); and
- Information recorded in specialist reports as appended to the Draft Basic Assessment Report.

### SITE SENSITIVITY VERIFICATION:

The table below and related supporting information detailed therein serves to verify land use and sensitivities identified by the screening tool report (STR).

SENSITIVITY AND SPECIALIST INPUT IDENTIFIED IN TERMS OF THE DEFF SCREENING TOOL	VERIFICATION OF SITE-SPECIFIC SENSITIVITY AND RELATED SPECIALIST INVESTIGATION UNDERTAKEN
<p><b>Animal Species theme</b>  <b>High sensitivity</b></p> <p>No specific protocol-consider general requirements (GG 45421 of 10/05/2019) _DRAFT.</p> <p>Actual Sensitivity: <b>Low</b></p>	<p>Given the Medium rating of the STR, a terrestrial biodiversity site assessment was undertaken by a suitably qualified ecologist which included an investigation into the likelihood of faunal impacts on especially locally indigenous species of conservation concern. Due to the fragmented and transformed habitat of the site, the specialist concluded that the site is unsuitable for playing host to any locally indigenous terrestrial biodiversity of any importance, including fauna (Altern, 2020).</p> <p>As such, further study into Animal Species was not undertaken.</p>
<p><b>Aquatic biodiversity theme</b>  <b>Low sensitivity</b></p> <p>3(b) Protocol for the assessment and reporting of environmental impacts on</p>	<p>No watercourse, wetlands or dams have been mapped in or adjacent to the site by the National Freshwater Ecosystem Priority Areas Mapping, National Wetland Mapping, Western Cape Biodiversity Spatial Plan (WCBSP) or the City of Cape Town's Biodiversity Network wetland mapping.</p>

<p>aquatic biodiversity (GG 45421 of 10/05/2019) – DRAFT.</p> <p>Actual sensitivity: <b>Low</b></p>	<p>An independent freshwater ecologist however confirmed the presence of an aquatic feature which comprises of a small unnamed stream that flows along the southern border of the site as well as a drainage feature within Erf 47 (Belcher, 2020). The small stream on the site was confirmed to be of ‘Low’ ecological importance and sensitivity. The stream will nonetheless be maintained within the existing stormwater corridor through which it flows, which is beyond the proposed development footprint.</p> <p>Given the presence of a watercourse at the site, an Aquatic Impact Assessment was completed by a freshwater specialist and the findings contained therein incorporated into the Draft BAR.</p>
<p><b>Archaeological and cultural heritage theme</b> <b>High sensitivity</b></p> <p>No specific protocol-consider general requirements (GG 45421 of 10/05/2019) _DRAFT.</p> <p>Actual sensitivity: <b>Low</b></p>	<p>A Heritage Practitioner was appointed to screen the site and verify the level of sensitivity identified by the STR.</p> <p>The heritage screening assessment found no structures of heritage value on site (Lavin, 2020). Furthermore, the nearest place of heritage significance (namely Botany Bay) is located sufficiently far from the site that it is unlikely that any heritage resources associated with this history will be negatively impacted by the proposed development. These issues were contemplated in the Notice of Intent to Develop (NID) in terms of the National Heritage Resources Act (NHRA) and submitted to Heritage Western Cape (HWC).</p> <p>In response to the NID, HWC confirmed that the proposal would not impact on heritage resources and instructed no further study in this regard.</p> <p>The NID and HWC response thereto have been included in the Draft BAR.</p>
<p><b>Plant species theme</b> <b>Medium sensitivity</b></p> <p>No specific protocol-consider general requirements (GG 45421 of 10/05/2019) _DRAFT.</p> <p>Actual Sensitivity: <b>Low</b></p>	<p>Given the Medium rating of the STR, a terrestrial biodiversity site assessment was undertaken by a suitably qualified ecologist which included an investigation into the plant species on site and their conservation status. In alignment with the WCBSP (see Figure 3 below), the investigation found the site to be of ‘Low’ sensitivity in terms of terrestrial biodiversity with it mostly containing common opportunistic transformer plants and weeds and no evidence of an intact ecosystem of indigenous vegetation (Altern, 2020).</p> <p>Given the above, no detailed plant species assessment was undertaken because there are no important plants to assess. The Terrestrial Biodiversity Compliance Statement has been included in the Draft BAR.</p>
<p><b>Terrestrial biodiversity theme</b> <b>Very high sensitivity</b></p> <p>3(a) Protocol for the assessment and reporting of environmental impacts on terrestrial biodiversity (GG 45421 of 10/05/2019) _DRAFT.</p> <p>Actual Sensitivity: <b>Low</b></p>	<p>According to the WCBSP, there are no terrestrial ecologically sensitive areas on or adjacent to the site (refer to Figure 3). The City of Cape Town’s Biodiversity spatial data (which responds to the WCBSP), marks an Other Natural Area (zoned as Public Open Space) along to the eastern border of the site (refer to Figure 4).</p>

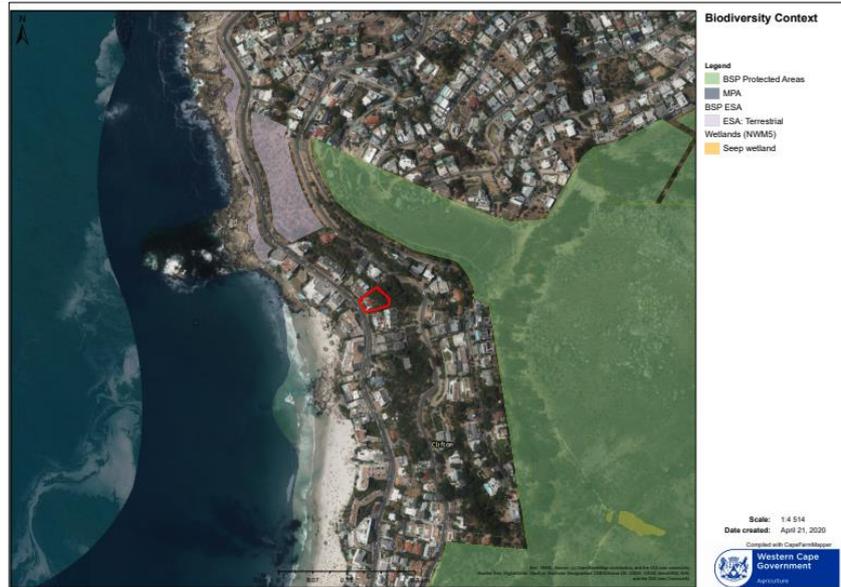


Figure 3: Biodiversity Map in terms of the Western Cape Biodiversity Spatial Plan

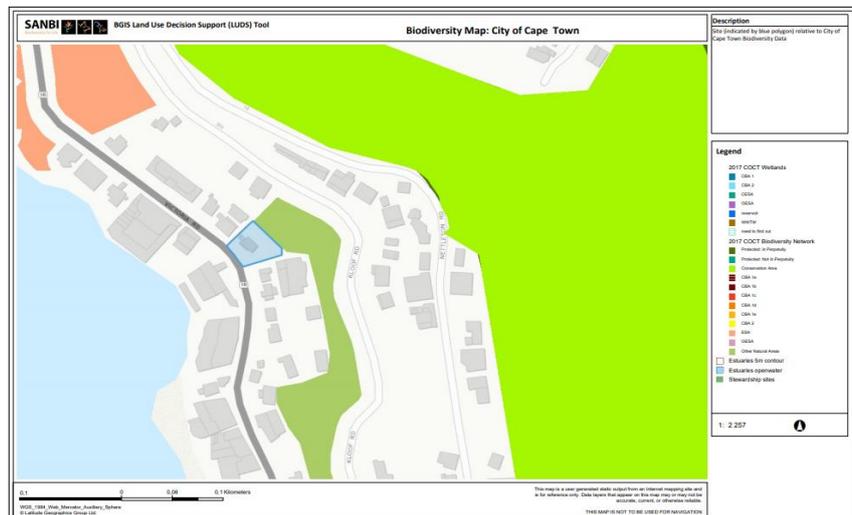


Figure 4: Biodiversity Map: City of Cape Town BioNet (created using SANBI GIS, April 2020)

A ground-truthing exercise by an independent ecologist found the site to be completely transformed and the once indigenous vegetation (Peninsula Granite Fynbos) replaced by common opportunistic transformer plants, alien trees and weeds (Altern, 2020).

As such, the investigation concluded the site to be of 'Low' sensitivity in terms of terrestrial biodiversity in contrast to the screening tool result. Accordingly, a Terrestrial Biodiversity Compliance Statement was completed in accordance with the relevant Protocols and the findings therein incorporated into the BAR.

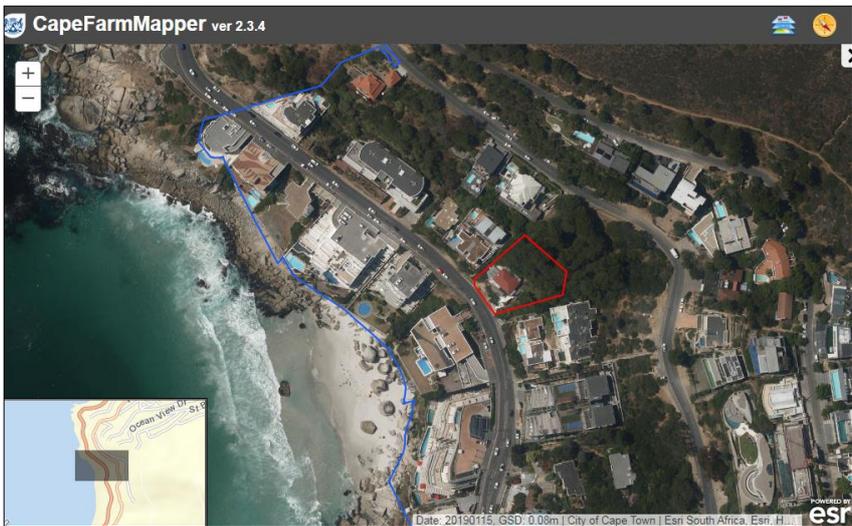
**Defence Theme**  
**Medium sensitivity**

No specific protocol-consider general requirements (GG 45421 of 10/05/2019) \_DRAFT.

The screening reports identify the site area as a 'defence site', but no further details are provided in this respect. The medium sensitivity for this theme is presumably due to the site falling within a 15 km radius of the Noon Gun, the Ysterplaat Aerodrome, the SAS Wingfield, and/or within the Wynberg Military Hospital.

None of the components comprising the development proposal would compromise the ability of the defence force to defend the area against any unrest / threats on security or provide training and

<p>Actual Sensitivity: <b>Low</b></p>	<p>support to military personnel. The proposed development would not interfere with any communications to and from these facilities (the proposal does not include telecommunications infrastructure beyond typical internet and phone connections) and would not interfere with any access points (as it is located sufficiently far from them and includes no "air travel" components). The proposed development would also not affect the firing of the noon gun.</p> <p>The development as proposed therefore presents no defence sensitivity and therefore, no specialist investigations have been deemed necessary and none are included in the BAR.</p>
<p><b>Civil Aviation Theme</b> <b>Medium sensitivity</b></p> <p>No specific protocol-consider general requirements (GG 45421 of 10/05/2019) _DRAFT.</p> <p>Actual Sensitivity: <b>Low</b></p>	<p>The screening report notes that the site is located between 15 km and 35 km from a civil aviation radar and a major civil aviation aerodrome.</p> <p>It is submitted that the development proposal will not impact on the safety or operations of the aerodrome or have any effect on the airspace or aviation radar because there will be no "air travelling" components to the proposed development and it would not emit any signals for telecommunications (i.e. it does not include any telecommunications towers or infrastructure in the proposed development) other than by making use of the existing telecommunications infrastructure in the area for internet and/or phone connections. The EAP recognises that the proposed apartment block would be new infrastructure in the landscape and occupy a minor area of airspace, however, the height of the proposed structure would be similar to those of the surrounding context, would be alongside a slope, and would be below Kloof Road, and are such that they will not affect the airspace available for movement of aeroplanes or impact on the safety of civil aviation in any way.</p> <p>As such, there is no civil aviation sensitivity attached to this development proposal, and no specialist assessment has been undertaken in this regard.</p>
<p><b>Additional sensitivities implied through specialist studies called for by the Screening Tool Report</b></p>	
<p><b>Landscape/ Visual Study</b></p> <p>No specific protocol-consider general requirements (GG 45421 of 10/05/2019) _DRAFT.</p> <p>Actual Regional Landscape sensitivity: <b>Low</b></p> <p>Actual Local Landscape sensitivity: <b>Moderate</b></p>	<p>A Heritage Practitioner conducted a screening assessment on the site and proposed development and submitted a NID to HWC. Among other aspects, the NID contemplates landscapes and natural features of cultural significance and the associated heritage screener noted an absence of such areas in the area surrounding the site. In response to the NID, HWC confirmed that no further assessment in terms of the NHRA is required and the Heritage Screener also noted that the proposed development fits in with the development context (Lavin, 2020).</p> <p>A visual impact assessment of the potential impacts of the proposal to the cultural landscape has been undertaken, the findings of which have been incorporated into the Draft BAR.</p> <p>The visual impact assessment found the regional landscape &amp; local landscape to be of 'Low' and 'Moderate' sensitivity, respectively (Gibbs, 2020)</p>

<p><b>Palaeontology Impact Assessment</b></p> <p>No specific protocol-consider general requirements (GG 45421 of 10/05/2019) _DRAFT.</p> <p>Actual sensitivity: <b>None</b></p>	<p>From a palaeontology perspective, the heritage screener and NID reported that the area proposed for development is underlain by sediments (granites from the Cape Peninsula Pluton) that have zero palaeontological sensitivity and that it is very unlikely that the development would impact on significant palaeontological heritage (Lavin, 2020).</p> <p>In response to the NID, HWC confirmed that the proposal would not impact on heritage resources.</p>
<p><b>Marine Impact Assessment</b></p> <p>No specific protocol-consider general requirements (GG 45421 of 10/05/2019) _DRAFT.</p> <p>Actual sensitivity: <b>Low</b></p>	<p>The site is located approximately 90m of the high-water mark on the landward side of Victoria Road within a section of coastline which is entirely transformed by residential development. The site is located within the coastal urban edge (as determine by the City of Cape Town) and on the landward side of the Coastal Management Line adopted by the DEA&amp;DP in terms of the National Environmental Management: Integrated Coastal Management Act (refer to Figure 5).</p>  <p><i>Figure 5: Figure 10: Coastal Urban Edge/ City of Cape Town Coastal Management Line adopted in terms of NEM: ICMA (created using CapeFarmMapper and CCT Open Data Portal, 2020)</i></p> <p>Engagement with the City of Cape Town's Coastal Management branch also indicates that "the two erven are above Victoria Road, and there is no risk there from a SLR/storm surge perspective" (pers comms, Mr. D, Colenbrander, 22 April 2020).</p> <p>The development within the limits of the site would not disrupt physical and dynamic coastal processes (such as wave, current and wind action, erosion etc.) or impact on any socio-economic activity related to the nearby coastline. The present unfettered public access to the local beaches/coastline would also not be affected.</p> <p>Given the above, the EAP concluded that a Marine Impact Assessment is not warranted for the proposal. Measures to prevent adverse impacts on the sensitive coastal environment have been included in the EMPr including the consideration of the nearby beach as a no-go area during construction.</p>
<p><b>Hydrological Assessment</b></p>	<p>An assessment of potential groundwater impacts was undertaken which concluded that the redevelopment of this site will most likely result in subsurface water build-up along the structures/walls in</p>

<p>No specific protocol-consider general requirements (GG 45421 of 10/05/2019) _DRAFT.</p> <p>Actual sensitivity: <b>Low</b></p>	<p>contact with the granite (Barrow &amp; Muller, 2020). The granite is believed to be jointed, fractured and weathered that could result in significant amount of groundwater flow downgradient towards the ocean.</p> <p>The findings and recommendations of the assessment have been included in the BAR.</p>
<p><b>Socio-economic Assessment</b></p> <p>No specific protocol-consider general requirements (GG 45421 of 10/05/2019) _DRAFT.</p> <p>Actual sensitivity: <b>Low</b></p>	<p>A full Socio-Economic Assessment has not been undertaken given the small-scale nature of the project and due to the fact that the site is already used for residential purposes.</p> <p>The socio-economic aspects of the site and proposal have been considered and addressed in the BAR through inclusion of the following:</p> <ul style="list-style-type: none"> <li>• Socio-economic profile of the local area; and</li> <li>• Reporting on the financial implications of the proposed development in terms of potential for job creation and the duration of available jobs.</li> </ul>

The additional following sensitivities have also been considered:

- **Traffic** - Actual sensitivity is considered to be 'Low' given that the construction phase trip generation and average hourly trips would be insignificant (comprising less than 0.5% of Victoria Road background traffic), while the operational phase will also be insignificant at an estimated 3 trips per hour during peak traffic. A Transport Impact Assessment has been completed and included in Draft BAR.
- **Geotechnical Considerations**- Actual sensitivity is deemed to be Medium – High given the steep slope and required deep excavations, potential into hard rock, but development would still be possible. A Geotechnical Study has been included in the BAR.

**Special note:**

The above discussion highlights the specialist studies that have been undertaken as part of the Basic Assessment process and motivates site sensitivities in the opinion of the EAP (and specialists, where relevant). However, this may change if the DEA&DP or other commenting authorities / interest groups / parties raise valid reasons why any specific studies should be undertaken.

**References:**

Altern, S (2020) Terrestrial Biodiversity Compliance Statement Erven 46 & 47, Clifton, Western Cape, South Africa. NCC Environmental Services.

Barrow, D & Muller, C (2020). Groundwater impact assessment for the proposed redevelopment of a property in Clifton, Cape Town. GEOSS South Africa (Pty) Ltd

Belcher, T (2020). Aquatic Specialist Assessment Report for the Proposed Development of Erven 46 and 47, Clifton in the City of Cape Town, BlueScience.

Fautley, S (2020). Traffic Specialist Report for the Proposed Azalea Residential Development on Erven 46 & 47 in Camps Bay, Cape Town, Western Cape Province. Techso (Pty) Ltd.

Gibbs, D. (2020). Visual Impact Statement: Azalea Proposed Flats on the Consolidation of Erven 46 & 47, Clifton. David Gibbs.

Lavin, J. (2020). Heritage Screener for Proposed Development of a Block of Flats on Erf 46 and 47, in Clifton, Cape Town. CTS Heritage.

Muller, C & Penwarden, M (April 2021). Basic Assessment Report for the Proposed Development of the Azalea Apartment Block and Associated Infrastructure on Erf 46 and Erf 47 (To be consolidated into Erf 580) Clifton. Chand Environmental Consultants, Plumstead