



**REFERENCE NUMBER:** 16/3/3/6/7/1/A2/45/3064/21  
**ENQUIRIES:** Mr. R. Chambeau  
**DATE OF ISSUE:** **26 MARCH 2021**

The Trustees  
The War Family Trust  
21 Ladies Mile EXT  
**CONSTANTIA**  
7806

**For Attention: Mr. R. Colemim**

Tel: (021) 631 2911  
E-mail: [rorycolemim@gmail.com](mailto:rorycolemim@gmail.com)

Dear Sir

**COMMENT ON THE SITE SENSITIVITY VERIFICATION REPORT FOR THE PROPOSED RESIDENTIAL DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE ON ERF 511, WETTON.**

1. Your Notice of Intent ("NOI") dated and received by this Department via electronic mail correspondence on 24 February 2021, this Directorate's electronic mail correspondence dated 02 March 2021, this Directorate's correspondence dated 09 March 2021, the site sensitivity verification report dated March 2021 and received by this Department via electronic mail correspondence on 10 March 2021, this Directorate's electronic mail correspondence dated 10 March and 17 March 2021, your correspondence received via electronic mail correspondence on 18 March 2021, this Directorate's electronic mail correspondence dated 19 March 2021, this Directorate's acknowledgment thereof dated 24 March 2021 and the Environmental Assessment Practitioner's ("EAP's") electronic mail correspondence dated 24 March 2021, refer.
2. This letter serves as comment on the site sensitivity verification report and confirmation of the applicable listed activities in terms of the NEMA EIA Regulations, 2014 (as amended) by this Directorate.
3. Based on the site verification report dated March 2021 and the EAP's electronic mail correspondence dated 24 March 2021, please note the following:
  - 3.1. Applicable listed activities
    - 3.1.1. Given that the proposed road will be developed on areas zoned transport 1 and Community 1, Activity 4 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended) will not be triggered by the proposed development.
    - 3.1.2. Given that the proposed development will be approximately 0.4ha in extent, Activity 27 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) will not be triggered by the proposed development.

3.1.3. It is hereby confirmed that the proposed development will trigger Activity 19 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) and Activity 12 of Listing Notice 3 of the NEMA EIA Regulations, 2014 (as amended).

### 3.2. The site sensitivity verification report

- 3.2.1. Based on the site sensitivity verification report, this Directorate notes that the agriculture sensitivity, as identified by the Screening Report (i.e. high sensitivity), is disputed. Based on the site photographs it is evident that the site is not used for agriculture. Further, the proposed site is not zoned for agricultural purposes. This Directorate therefore agrees that no further assessment is required.
- 3.2.2. Based on the site sensitivity verification report, this Directorate notes that the animal species sensitivity, as identified by the Screening Report (i.e. medium sensitivity), is neither confirmed or disputed. The EAP recommended that a site visit is carried out by a relevant SACNASP registered professional to determine whether any further action/assessment will be required. Please note that according to the protocols, the likelihood of the species identified in the screening tool report (i.e. *Conocephalus peringueyi*, *Sclerophrys pantherina* and *Microbatrachella capensis*) occurring on the proposed site must be determined. The outcome of the specialists' assessment will determine the need for a Terrestrial Animal Species Specialist Assessment or Compliance Statement. This must be reported on in the draft BAR.
- 3.2.3. Based on the fact that the site sensitivity verification report confirms the aquatic biodiversity sensitivity, as identified by the Screening Report (i.e. very high sensitivity), a Freshwater Impact Assessment will be provided.
- 3.2.4. Based on the site sensitivity verification report, this Directorate notes that the civil aviation and defence theme sensitivities, as identified by the Screening Report (i.e. high sensitivity and medium sensitivity respectively), are disputed. The proposed site is located within a residential/urban area, which is in-keeping with the surrounding residential area. The proposed development is therefore not expected to have any impacts on civil aviation or defence. This Directorate therefore agrees that no further assessment is required.
- 3.2.5. Based on the site sensitivity verification report, this Directorate notes that the archaeological and cultural heritage and Palaeontology sensitivities, as identified by the Screening Report (i.e. high sensitivity and medium sensitivity, respectively), are disputed. Given that the proposed development is located within an urban area and does not trigger Section 38 of the National Heritage Resources Act, 1999 (Act No 25 of 1999), this Directorate agrees that no further assessment is required.
- 3.2.6. Based on the fact that the site sensitivity verification report confirms the plant species sensitivity, as identified by the Screening Report (i.e. medium sensitivity), the EAP recommends that a Botanical Compliance Statement be provided. This Directorate agrees that a Botanical Compliance Statement be provided along with the draft BAR.
- 3.2.7. Based on the fact that the site sensitivity verification report confirms the terrestrial biodiversity sensitivity, as identified by the Screening Report (i.e. very high sensitivity), a freshwater assessment and botanical compliance statement will address the potential terrestrial biodiversity impacts associated with the proposed development.
- 3.2.8. This Directorate notes that the Landscape / Visual Impact Assessment, Hydrology Assessment and Socio-Economic Assessment will not be undertaken. This Directorate agrees that none of these assessments are required.

3.2.9. This Directorate notes that clarity with respect to the need for a Traffic Impact Statement is required. Based on the potential traffic impacts associated with the proposed development, it is recommended that a Traffic Impact Statement be included in the draft BA. Comment from the Department of Transport and Public Works and City of Cape Town's Transport Department should be obtained in this regard.

4. Given that the proposed site is located within a wetland, it is recommended that a Geotechnical Assessment be conducted to determine the suitability of the site for the proposed development. This must be provided along with the submission of the draft BAR.
5. This Directorate therefore awaits the submission of the pre-application draft BAR and/or an application for environmental authorisation in this regard.
6. Kindly quote the abovementioned reference number in any future correspondence in respect of this report.

This Directorate reserves the right to revise or withdraw comments or request further information based on any information received.

Yours faithfully

**p.p.** \_\_\_\_\_  
**HEAD OF DEPARTMENT**

Copies to: (1) Mr. E. Marais (Sillito Environmental Consulting)  
(2) Ms. S. Hustwick (City of Cape Town: ERM)

E-mail: [eugene@environmentalconsultants.co.za](mailto:eugene@environmentalconsultants.co.za)  
E-mail: [Sandra.Hustwick@capetown.gov.za](mailto:Sandra.Hustwick@capetown.gov.za)