



**SITE VERIFICATION REPORT FOR THE PROPOSED HOUSING  
DEVELOPMENT ON PORTIONS OF FARM 1388, KUILS RIVER, WESTERN  
CAPE.**

**Date: January 2026**

**SEC REFERENCE: 024023**

**DEAD&DP REF: 16/3/3/6/7/1/A8/74/3100/25**

# 1. Introduction & Legislative Context

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## **BACKGROUND**

In terms of the *Protocols for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes* (referred to "the Protocols" hereafter) as per Government Notice No. 320 (published in Government Gazette No. 43110 on 20 March 2020)<sup>1</sup>, a Site Sensitivity Verification (SSV) Report must be compiled and submitted with each new application submitted after the effective date of the Protocols (9<sup>th</sup> May 2020).

The aim of the SSV Report is to (i) verify the land use and various theme sensitivities which were identified by the DEA Screening Tool (Appendix A), (ii) agree/dispute theme sensitivity ratings, and provide motivations should the theme sensitivity be challenged, and (iii) provide a motivation as to why the need for identified specialist studies are challenged.

## **METHODOLOGY**

In terms of the Protocols, the EAP must verify the site's environmental sensitivity in accordance with theme sensitivities and required specialist studies as identified by the DEA Screening Tool (Appendix D). This aids in determining the applicability of the National Environmental Management Act, 1998 (Act No. 107 of 1998), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in relation to the proposed application.

The SSV Report was compiled based on desktop studies and site photographs to determine the applicability of the EIA Regulations, 2014 (as amended) to the proposed application. This SSV Report was compiled by the EAP (Chantel Muller) & Cand. EAP (Jonathan Lassen). It must be noted that this SSV Report must be read in combination with the Supporting Documents and DEA Screening Tool (Appendix D), as well as any other document appended in support of this Pre-Application BAR.

## **PROJECT DESCRIPTION**

The proposed development on Remainder Farm 1388, Kuils River entails the establishment of a mixed-use residential neighbourhood designed to provide a range of housing opportunities and supporting community facilities within an environmentally sensitive, well-serviced urban setting. The development area measures approximately 12.15 hectares and will comprise ±436 Single Residential 1 erven, two General Residential erven (±0.63 ha), one General Business erf (±0.58 ha), associated public open-space and stormwater-management areas, and the required internal road and service infrastructure.

The site is situated on the western bank of the Kuils River, within the City of Cape Town municipal urban edge, and is surrounded by established residential suburbs including Belhar and Wesbank. Access to the development will be obtained via the southern extension of Reuter Street, with a secondary connection to Old Nooiensfontein Road. A hierarchical road network will link the various precincts and provide for vehicles,

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<sup>1</sup>

pedestrians, and cyclists, with traffic-calming features, sidewalks, and landscaped verges to ensure safe and efficient movement throughout the site.

In support of sustainable urban-design principles, the layout integrates a network of open spaces and stormwater attenuation ponds, forming part of a 32-metre riparian buffer zone along the Kuils River. This area will remain undeveloped and will be rehabilitated with indigenous riparian vegetation to enhance ecological function, water quality, and visual amenity. The internal stormwater system will incorporate Water-Sensitive Urban-Design (WSUD) measures such as vegetated swales, litter traps, and detention facilities to manage runoff quantity and quality before controlled discharge into the river.

The site is largely transformed, comprising open, disturbed ground and isolated stands of exotic trees, with no significant indigenous vegetation or sensitive terrestrial habitats present. The surrounding area is serviced by existing municipal water, sanitation, and electricity networks, ensuring that the proposed development can be accommodated without major bulk-infrastructure upgrades.

Overall, the project seeks to deliver a context-appropriate, energy-efficient, and socially inclusive neighbourhood that responds to the City's spatial-planning objectives while safeguarding the environmental integrity of the adjacent Kuils River corridor. The Environmental Management Programme (EMPr) provides the framework for managing and monitoring environmental performance during the planning, construction, and operational phases, ensuring that the project is implemented in accordance with the principles of sustainable development as required under the National Environmental Management Act (Act 107 of 1998).



**Figure 1: Locality map of the study site.**

The proposed development triggers the following 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: **Activities 19 & 28 from Listing Notice 1.** (NEMA EIA Regulations 2014, as amended).

Sillito Environmental Consulting (Pty) Ltd (SEC) has been appointed to manage the environmental compliance during the establishment of the proposed housing development on portions of Farm 1388, Kuils River, Western Cape in terms of the NEMA EIA Regulations 2014 (as amended).

Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended, states that a Basic assessment 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 20<sup>th</sup> March 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

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The table below indicates the level of sensitivity of each of the themes identified in the National Web-based Screening Tool Report, dated February 2024:

Theme	Very Sensitivity	High	High Sensitivity	Medium Sensitivity	Low Sensitivity
Agriculture Theme			X		
Animal Species Theme				X	
Aquatic Biodiversity Theme	X				
Archaeological & Cultural Heritage					X
Civil Aviation Theme	X				
Defense Theme				X	
Paleontology Theme					X
Plant Species Theme				X	
Terrestrial Biodiversity Theme	X				

**Table 1.** Site sensitivity themes as identified by the DEA Screening Tool (Appendix A).

No	Theme	DEA Sensitivity	Agree / Disagree	Proposed Sensitivity	Motivation
1	Agriculture Theme	High Sensitivity	Disagree	Low Sensitivity	<p>An Agricultural Compliance Statement was undertaken for the proposed housing development on Farm 1388, Kuils River. Although regional datasets and the national screening tool indicate portions of the site as having medium to high agricultural sensitivity, a site-specific assessment confirmed that the land is not suitable for viable or sustainable crop production. This is primarily due to its urban-encroached location, small property size, lack of agricultural infrastructure, and inherent soil limitations (predominantly sandy soils with low water-holding capacity).</p> <p>Based on the verified on-site conditions, the entire development footprint is assessed as being of low agricultural sensitivity. The permanent exclusion of agriculture from the site will therefore result in a negligible loss of future agricultural production potential. The associated agricultural impact is of low significance and acceptable, with no mitigation measures or conditions required. From an agricultural perspective, the proposed development is supported and recommended for approval.</p>
2	Animal Species Theme	Medium Sensitivity	Disagree	Low Sensitivity	<p>As confirmed in the Terrestrial Compliance Statement compiled by The Biodiversity Company; The site is highly transformed and surrounded by existing residential and institutional development, offering limited habitat for indigenous fauna. Only common, disturbance-tolerant species such as rodents, small reptiles, and generalist birds are likely to occur. No faunal species of conservation concern were recorded or are expected to persist within the development footprint. The adjacent Kuils River corridor may provide movement pathways for amphibians and birds, but these areas will be retained and buffered. With the implementation of the riparian no-go area and standard faunal rescue procedures during site clearing, impacts on animal species will be negligible.</p>
3	Aquatic Biodiversity Theme	Very high Sensitivity	Agree	Very high Sensitivity	<p>As confirmed in the Terrestrial Compliance Statement compiled by The Biodiversity Company; The Kuils River forms the eastern boundary of the site and represents the primary aquatic feature. The Aquatic Biodiversity Assessment identified the river and its riparian zone as a Very High aquatic sensitivity area providing moderate ecological function despite urban degradation. Approximately 40% of the property lies within the 1:100-year floodline, which has been excluded from development. The study recommends maintaining a minimum 32 m riparian buffer, implementing stormwater quality controls, and rehabilitating riparian vegetation with indigenous species. If these measures are applied, impacts to aquatic biodiversity will remain low and reversible.</p>

4	Archaeological and Cultural Heritage Theme	Low Sensitivity	Agree	Low Sensitivity	A review of available heritage data and site inspection indicated no recorded heritage resources within or adjacent to Farm 1388. The site has been previously disturbed by agricultural and informal activities and contains no structures or features older than 60 years as defined by the National Heritage Resources Act (Act 25 of 1999). The area is of low archaeological and cultural sensitivity, with no visible artefacts or graves observed during field verification. A chance-find procedure will be implemented during construction to manage any unexpected discoveries. The overall heritage impact significance is therefore low.
5	Civil Aviation Theme	Very High Sensitivity	Disagree	Negligible	The proposed development area will be within 15km of a civil aviation radar, a civil aviation aerodrome and within 8km of a major civil aviation aerodrome. The proposed activities and development will however have no impact on any civil aviation related infrastructure, and it is therefore the opinion of the EAP that the proposed rating be reassessed as negligible.
6	Defence Theme	Medium Sensitivity	Disagree	Negligible	The proposed development area will be within proximity to a military and defence site. The proposed activities and development will however have no impact on any defence related infrastructure, and it is therefore the opinion of the EAP that the proposed rating be reassessed as negligible.
7	Paleontological Theme	Low Sensitivity	Agree	Low Sensitivity	According to the South African Heritage Resources Information System (SAHRIS) and the Council for Geoscience mapping, the site is underlain by Malmsbury Group sediments, which are of low palaeontological sensitivity. The area has been heavily transformed and contains extensive disturbance from past land use, significantly reducing the potential for intact fossil preservation. No palaeontological resources were observed on-site, and the likelihood of uncovering fossil material during excavation is very low. Nevertheless, a chance-find protocol will be implemented, and the ECO will immediately notify Heritage Western Cape if any fossiliferous material is exposed.
8	Plant Species Theme	Medium Sensitivity	Disagree	Low Sensitivity	The Terrestrial Biodiversity Compliance Statement confirmed that the site is entirely transformed, with vegetation dominated by ruderal grasses and alien pioneer species such as <i>Ehrharta calycina</i> and <i>Acacia saligna</i> . No intact indigenous vegetation or plant species of conservation concern were recorded. The site does not support any listed threatened ecosystems under the National Environmental Management: Biodiversity Act (NEMBA). Rehabilitation of open spaces and the riparian buffer using locally indigenous, water-wise species is recommended to improve ecological integrity. The overall botanical sensitivity is low.

9	Terrestrial Biodiversity Theme	Very High Sensitivity	Disagree	Low Sensitivity	<p>The Terrestrial Biodiversity Compliance Statement determined that the entire development footprint falls within a transformed area on the Western Cape Biodiversity Spatial Plan (WCBSF) and does not intersect any Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs). The terrestrial ecosystem is heavily degraded by historic agriculture and urban encroachment, offering no remaining natural habitat. As such, the development will not result in the loss of regionally important biodiversity features. The proposed alien-clearing, indigenous landscaping, and riparian rehabilitation will enhance ecological function, making the overall terrestrial biodiversity impact negligible to low.</p>
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### 3. Specialist Studies Identified by Screening Tool

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The following Specialist Assessments have been identified by the Screening Tool, dated 20<sup>th</sup> November 2023:

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. Hydrology Assessment
7. Socio-Economic Assessment
8. Plant Species Assessment
9. Animal Species Assessment

### 4. Motivation by the EAP Agreeing or Disputing the Specialist Assessments Identified in Screening Tool Report

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#### **1. The following specialist studies, as identified by the Screening Tool Report, will not be carried out:**

##### **1. Landscape/ Visual Impact Assessment**

A Visual Impact Assessment (VIA) **will not be** required as the site is within an urbanized and degraded environment, with extensive anthropogenic impacts such as illegal dumping and vegetation clearance. The absence of significant natural features and the presence of existing residential and commercial developments ensure the project aligns with the surrounding landscape. As confirmed by HWC upon receipt of the NID, no further studies are required.

##### **2. Archaeological and Cultural Impact Assessment.**

An Archaeological and Cultural Impact Assessment **will not be** required as the site is located within an urbanized area that has been heavily transformed for residential and commercial use. There are no known heritage resources on-site, and the desktop study confirms that the development will not impact cultural or historical assets. However, a chance finds clause will be included to address any unexpected discoveries during excavation. As confirmed by HWC upon receipt of the NID, no further studies are required.

##### **3. Palaeontology Impact Assessment**

A Paleontology Impact Assessment **will not be** required as the site is located within an urban area with a low paleontological significance rating. The land has been heavily disturbed by anthropogenic activities, including illegal dumping and vegetation clearance. Surrounding areas have also been transformed for residential and commercial use, further limiting potential impacts. A chance finds clause will however be included in case fossils are uncovered during excavation. As confirmed by HWC upon receipt of the NID, no further studies are required.

#### **4. Socio-Economic Assessment**

A Socio-Economic Assessment **will not be** required as the proposed development will have a positive socio-economic impact, contributing to the creation of jobs and business opportunities in the surrounding area. The project is aligned with existing residential and commercial development patterns, indicating that it will not lead to significant displacement or negative social consequences. Additionally, the development will not cause major disruption to the local community.

#### **5. Animal Species Assessment**

An Animal Species Impact Assessment **will not be** required as the site is highly transformed and surrounded by existing residential and institutional development, offering limited habitat for indigenous fauna. Only common, disturbance-tolerant species such as rodents, small reptiles, and general birds are likely to occur. No faunal species of conservation concern were recorded or are expected to persist within the development footprint. The adjacent Kuils River corridor may provide movement pathways for amphibians and birds, but these areas will be retained and buffered. With the implementation of the riparian no-go area and standard faunal rescue procedures during site clearing, impacts on animal species will be negligible.

**b) The following assessments have been identified by the Screening Tool Report to be carried out. The Competent Authority must please advise if they agree or dispute these findings.**

##### **1. Aquatic Biodiversity Assessment – Freshwater Impact Assessment**

The Kuils River forms the eastern boundary of the site and represents the primary aquatic feature. The Aquatic Biodiversity Assessment identified the river and its riparian zone as a Very High aquatic sensitivity area providing moderate ecological function despite urban degradation. Approximately 40% of the property lies within the 1:100-year floodline, which has been excluded from development. The study recommends maintaining a minimum 32 m riparian buffer, implementing stormwater quality controls, and rehabilitating riparian vegetation with indigenous species. If these measures are applied, impacts to aquatic biodiversity will remain low and reversible.

##### **2. Hydrology Assessment**

A Hydrology Assessment will be required due to the site's location within an area with a major aquifer of high susceptibility and high vulnerability. This makes the site particularly sensitive to groundwater contamination. The proposed development could affect the flow and quality of water in the aquifer, necessitating a detailed evaluation of water management practices.

##### **3. Terrestrial Biodiversity Impact Assessment**

The Terrestrial Biodiversity Compliance Statement determined that the entire development footprint falls within a transformed area on the Western Cape Biodiversity Spatial Plan (WCBSP) and does not intersect any Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs). The terrestrial ecosystem is heavily

degraded by historic agriculture and urban encroachment, offering no remaining natural habitat. As such, the development will not result in the loss of regionally important biodiversity features. The proposed alien-clearing, indigenous landscaping, and riparian rehabilitation will enhance ecological function, making the overall terrestrial biodiversity impact negligible to low.

#### **4. Agricultural Compliance Statement**

An Agricultural Compliance Statement was undertaken for the proposed housing development on Farm 1388, Kuils River. Although regional datasets and the national screening tool indicate portions of the site as having medium to high agricultural sensitivity, a site-specific assessment confirmed that the land is not suitable for viable or sustainable crop production. This is primarily due to its urban-encroached location, small property size, lack of agricultural infrastructure, and inherent soil limitations (predominantly sandy soils with low water-holding capacity).

Based on the verified on-site conditions, the entire development footprint is assessed as being of low agricultural sensitivity. The permanent exclusion of agriculture from the site will therefore result in a negligible loss of future agricultural production potential. The associated agricultural impact is considered to be of low significance and acceptable, with no mitigation measures or conditions required. From an agricultural perspective, the proposed development is supported and recommended for approval.



## 5. Conclusion

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Based on the outcomes of the Site Sensitivity Verification, supported by specialist studies and on-site verification, the proposed development area on Remainder Farm 1388, Kuils River is confirmed to be highly transformed and largely devoid of intact natural habitat. The only area of elevated environmental sensitivity is the Kuils River corridor along the eastern boundary, which has been fully accounted for through the delineation of a no-go area and 32 m riparian buffer in accordance with the findings of The Biodiversity Company (2025).

All other environmental themes, including terrestrial biodiversity, plant and animal species, heritage, palaeontology, and socio-economic considerations, have been verified as low sensitivity and not constraining to development, provided that the recommended mitigation measures and buffer requirements are implemented. The site is situated within the urban edge of the City of Cape Town, surrounded by existing residential and institutional land uses, and is serviced by adequate municipal infrastructure.

In conclusion, the site is environmentally suitable for the proposed mixed-use residential development, subject to adherence to the specialist recommendations, the Environmental Management Programme (EMPr), and the conditions of authorisation that ensure the protection and long-term management of the Kuils River riparian system. The verification process confirms that the proposed activity aligns with the principles of sustainable development as outlined in Section 2 of the National Environmental Management Act (Act 107 of 1998) and that all identified environmental risks can be effectively mitigated to acceptable levels.

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**Sillito Environmental Consulting (Pty) Ltd**