



**SITE VERIFICATION REPORT FOR THE PROPOSED INSTALLATION OF  
THREE 83M<sup>3</sup> (249M<sup>3</sup>) ABOVEGROUND DIESEL STORAGE TANKS ON ERF  
601, STASIE ROAD, LUTZVILLE, WESTERN CAPE.**

**Date: January 2026**

**SEC REFERENCE: 024053**

**DEA&DP REF: W-BA-EIA-L07**

## 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 D), (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 (Mr. Jonathan Lassen). It must be noted that this SSV Report must be read in combination with the DEA Screening Tool (Appendix I1), as well as any other document appended in support of this Post-Application BAR (Additional Round of PPP).

## PROJECT DESCRIPTION

The applicant, Agrimark (Pty) Ltd, proposes to expand their site by adding three 83m<sup>3</sup> (249m<sup>3</sup>) above-ground diesel storage tanks in the northern section, as outlined in the attached Site Development Plan (SDP) (Appendix I). This expansion will include the construction of a bund floor with new stairs (covering 1.14 m<sup>2</sup>), a new petrol dispenser area (22.5 m<sup>2</sup>), a spill slab (120 m<sup>2</sup>), and an additional bund floor area (237.17 m<sup>2</sup>). The total area covered by the expansion will be 380.81 m<sup>2</sup>.

The site located on Erf 601, Stasie Road, Lutzville, in the West Coast District, spans a total area of 17,130.38 m<sup>2</sup>. Currently, existing developments occupy only 17.57% of the site, covering 3,009.7 m<sup>2</sup>. The infrastructure on the site includes a fuel service station with a forecourt area, a convenience store, a gas storage facility, a mini substation, an Agrimark retail store, and two Agrimark warehouses. Additionally, the site features 80 designated parking bays for visitors and staff.



**Figure 1: Locality Map – with proposed expansion area highlighted in red zone (Cape Farm Mapper)**

In summary, the following is proposed:

- The installation of three 83m<sup>3</sup> (249m<sup>3</sup>) aboveground diesel storage tanks.

The proposed expansion 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: **Activity 51 of Listing Notice 1 (2014 EIA Regulations, as amended)**.

Sillito Environmental Consulting (Pty) Ltd (SEC) has been appointed to undertake the Basic Assessment 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 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 4<sup>th</sup> of March 2025:

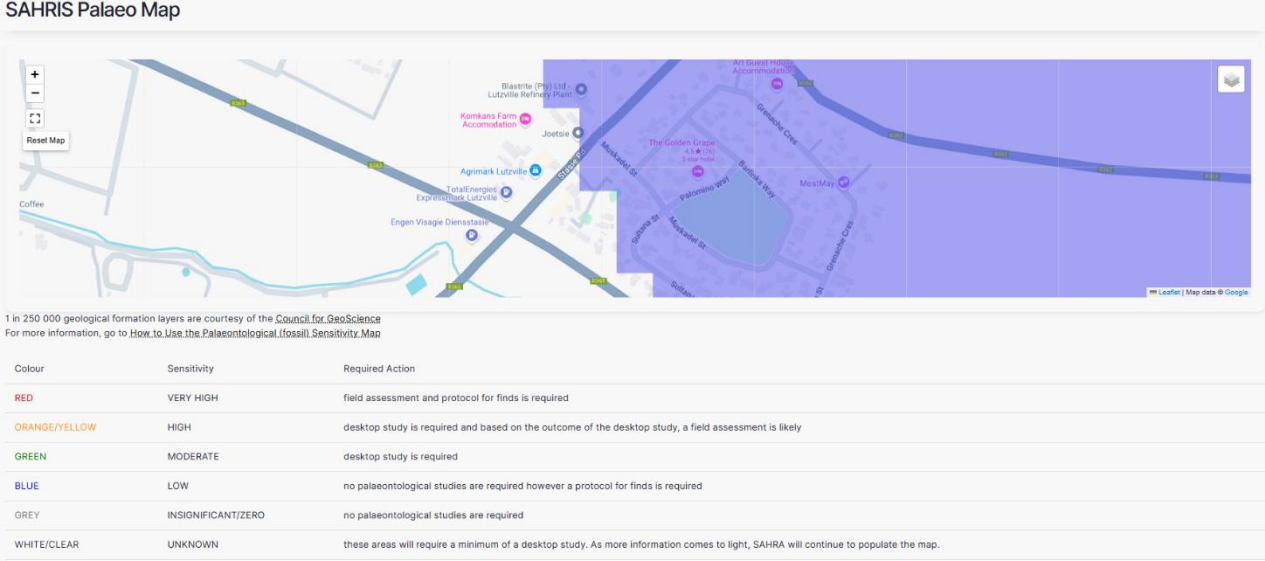
Theme	Very High Sensitivity	High Sensitivity	Medium Sensitivity	Low Sensitivity	EAPs Opinion
Agriculture Theme				X	Agree
Animal Species Theme		X			Disagree
Aquatic Biodiversity Theme	X				Disagree
Archaeological & Cultural Heritage				X	Agree
Civil Aviation Theme		X			Disagree
Defence Theme				X	Disagree
Paleontology Theme			X		Disagree
Plant Species Theme			X		Disagree
Terrestrial Biodiversity Theme	X				Disagree

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

No	Theme	DEA Sensitivity	Agree / Disagree	Proposed Sensitivity	Motivation
1	Agriculture Theme	Low Sensitivity	Agree	Low Sensitivity	The proposed site for expansion is an existing, fully transformed and operational area that does not support agricultural crops or activities. The site is located within a built-up urban environment, is not zoned for agricultural use, and is surrounded by established commercial and residential land uses. Based on the transformed nature of the site and the findings of the Agricultural Compliance Statement, the site is confirmed to have low agricultural sensitivity, and the proposed fuel storage expansion will not result in the loss of agricultural resources or production potential.
2	Animal Species Theme	High Sensitivity	Disagree	Low Sensitivity	Anthropogenic activities associated with historical site clearance and the ongoing operation of the facility have resulted in the site being extensively transformed and disturbed. The proposed expansion will be confined to an existing developed footprint that contains infrastructure such as a fuel service station, warehouses, a mini-substation and a convenience store. Peer-reviewed terrestrial biodiversity assessments confirm that the site does not provide suitable habitat for animal species of conservation concern, and that the occurrence of fauna listed in the screening tool within the development footprint is highly unlikely. Based on the transformed nature of the site and the findings of the peer-reviewed specialist assessments, the Animal Species Theme sensitivity is confirmed as 'Low'. The findings of the terrestrial biodiversity assessments are discussed further in Section G of the Post-Application BAR.
3	Aquatic Biodiversity Theme	Very High Sensitivity	Disagree	Low Sensitivity	The Aquatic Biodiversity Theme was initially rated as 'Very High' by the national environmental screening tool due to the identification of an Aquatic Ecological Support Area (ESA1) in proximity to the site and the presence of a non-perennial drainage feature along the western boundary. However, a peer-reviewed Aquatic Biodiversity assessment has since been completed, which confirms that the non-perennial drainage feature is located approximately 70 m west of the

					<p>proposed development footprint, is highly modified, and functions predominantly as a stormwater conveyance channel.</p> <p>The peer-review further confirms that the ESA identified through desktop mapping was incorrectly delineated and does not overlap with, or extend into, the proposed development footprint. The proposed installation of the three 83 m³ above-ground diesel storage tanks will be confined to an existing developed area, and with the implementation of appropriate containment and spill-prevention measures, no direct or indirect impacts on the non-perennial drainage feature are anticipated.</p> <p>Based on the transformed nature of the site, the surrounding anthropogenic land uses, and the findings of the peer-reviewed aquatic specialist assessment, the aquatic biodiversity sensitivity of the site is confirmed as 'Low'. The findings of the aquatic specialist review are discussed further in Section G of the Post-Application BAR.</p>
4	Archaeological and Cultural Heritage Theme	Low Sensitivity	Agree	Low Sensitivity	<p>The Archaeological and Cultural Heritage Theme has been rated as 'Low', due to the nature of the site and proposed expansion activities; the EAP agrees with the assigned 'Low' sensitivity rating. Due to the nature of the proposed expansion activities, a chance finds clause will still be included and if any archaeological or cultural remains were uncovered, the necessary specialists would be contacted to determine the way forward.</p>
5	Civil Aviation Theme	High Sensitivity	Disagree	Negligible	<p>The Civil Aviation Theme has been rated as 'High' due to the site being within an 8km proximity of a civil aviation aerodrome. The proposed expansion activities will have no impact on any surrounding civil aviation activities or infrastructure, it is therefore envisaged that the assigned sensitivity rating should be 'Negligible'.</p>

6	Defence Theme	Low Sensitivity	Disagree	Negligible	<p>The Defence Theme has been rated as 'Low', due to the nature of the site and proposed expansion activities, the development will have no impact on any Defence related infrastructure or activities. The EAP therefore disagrees with the assigned 'Low' sensitivity rating, and it is envisaged that the rating should be 'Negligible'.</p>
7	Paleontology Theme	Medium Sensitivity	Disagree	Low Sensitivity	<p>According to Paleontological Online Map Tool (<a href="https://sahris.sahra.org.za/map/palaeo">https://sahris.sahra.org.za/map/palaeo</a>), the proposed site is situated on the border an area of low paleontological significance. Moreover, the site has been previously transformed. The proposed fuel storage expansion is therefore unlikely to impact any paleontological resource. It is envisaged that the proposed site has a 'Low' sensitivity relative to the Paleontological Theme. As mentioned for Sensitivity Theme 4 (Archaeological and Cultural Heritage Theme) a chance finds clause will still be included and if any archaeological or cultural remains were uncovered, the necessary specialists would be contacted to determine the way forward.</p>

					<p><b>SAHRIS Palaeo Map</b></p>  <p>1 in 250 000 geological formation layers are courtesy of the Council for GeoScience For more information, go to <a href="#">How to Use the Palaeontological (fossil) Sensitivity Map</a></p> <table border="1"> <thead> <tr> <th>Colour</th> <th>Sensitivity</th> <th>Required Action</th> </tr> </thead> <tbody> <tr> <td>RED</td> <td>VERY HIGH</td> <td>field assessment and protocol for finds is required</td> </tr> <tr> <td>ORANGE/YELLOW</td> <td>HIGH</td> <td>desktop study is required and based on the outcome of the desktop study, a field assessment is likely</td> </tr> <tr> <td>GREEN</td> <td>MODERATE</td> <td>desktop study is required</td> </tr> <tr> <td>BLUE</td> <td>LOW</td> <td>no palaeontological studies are required however a protocol for finds is required</td> </tr> <tr> <td>GREY</td> <td>INSIGNIFICANT/ZERO</td> <td>no palaeontological studies are required</td> </tr> <tr> <td>WHITE/CLEAR</td> <td>UNKNOWN</td> <td>these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.</td> </tr> </tbody> </table>	Colour	Sensitivity	Required Action	RED	VERY HIGH	field assessment and protocol for finds is required	ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely	GREEN	MODERATE	desktop study is required	BLUE	LOW	no palaeontological studies are required however a protocol for finds is required	GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required	WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.
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8	Plant Species Theme	Medium Sensitivity	Disagree	Low Sensitivity	<p>Anthropogenic activities, including historical site clearance and the ongoing operation of the facility, have resulted in the site being extensively transformed and disturbed. The proposed expansion will be confined to an existing developed footprint that contains infrastructure such as a fuel service station, warehouses, a mini-substation and a convenience store. Peer-reviewed terrestrial biodiversity assessments confirm that the site does not provide suitable habitat for plant species of conservation concern, and that the occurrence of flora listed in the screening tool within the development footprint is highly unlikely. Based on the transformed nature of the site and the findings of the peer-reviewed specialist assessments, the Plant Species Theme sensitivity of the site is confirmed as 'Low'. The findings of the terrestrial biodiversity assessments are discussed further in Section G of the Post-Application BAR.</p>																					

9	Terrestrial Biodiversity Theme	Very High Sensitivity	Disagree	Low Sensitivity	<p>The Terrestrial Biodiversity Theme was initially rated as 'Very High' by the national environmental screening tool due to the identification of an Ecological Support Area (ESA2) in proximity to the site and its association with a non-perennial drainage feature along the western boundary. However, a peer-reviewed terrestrial biodiversity assessment has since confirmed that the ESA2 was incorrectly identified through desktop mapping and does not reflect the current on-site conditions.</p> <p>The proposed development footprint is confined entirely to an existing, fully transformed and operational site, and does not overlap with any natural or semi-natural terrestrial habitat. The non-perennial drainage feature is located outside the development footprint and is highly modified, functioning primarily as a stormwater conveyance channel.</p> <p>Based on the transformed nature of the site, the surrounding anthropogenic land uses, and the findings of the peer-reviewed terrestrial biodiversity assessment, no direct or indirect impacts on terrestrial biodiversity are anticipated. The terrestrial biodiversity sensitivity of the site is therefore confirmed as 'Low'. The findings of the terrestrial specialist assessment are discussed further in Section G of the Post-Application BAR.</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 the 4<sup>th</sup> of March 2025:

1. Agricultural 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. Noise Impact Assessment
8. Traffic Impact Assessment
9. Geotechnical Assessment
10. Socio-economic Assessment
11. Plant Species Assessment
12. Animal Species Assessment

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

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

##### **1. Archaeological and Cultural Heritage Impact Assessment**

This theme was given a 'Low' sensitivity rating. Due to the nature of the site and proposed expansion activities; the EAP agrees with the assigned 'Low' sensitivity rating. Due to the nature of the proposed expansion activities, a chance finds clause will still be included and if any archaeological or cultural remains were uncovered, the necessary specialists would be contacted to determine the way forward. It is therefore envisaged that an Archaeological and Cultural Heritage Impact Assessment will **not** be required.

##### **2. Palaeontology Impact Assessment**

The Palaeontology Theme was given a 'Medium' sensitivity rating but since the site has already been completely developed, the EAP recommended that the assigned rating be 'Low'. In addition to this, according to Paleontological Online Map Tool (<https://sahris.sahra.org.za/map/palaeo>), the proposed site is situated within an area of low paleontological significance. It is therefore envisaged that a Palaeontology Impact Assessment will **not** be required. Due to the nature of the proposed expansion activities, a chance finds clause will still be included and if any paleontological remains were uncovered, the necessary specialists would be contacted to determine the way forward.

##### **3. Noise Impact Assessment**

The proposed fuel storage expansion will occur within a previously transformed site with existing noise-related operational conditions. It is therefore envisaged that a Noise Impact Assessment (NIA) will **not** be required due to existing noise-related operational conditions.

#### **4. Traffic Impact Assessment**

Due to the type of activity (i.e. expansion), it is envisaged that the increase in traffic will be negligible. In addition, the area where the tanks are to be installed are removed from high traffic areas on site and will not cause obstructions within the roadway. Therefore, it is envisaged that a Traffic Impact Assessment will **not** be required.

#### **5. Socio-Economic Assessment**

The construction phase will create temporary employment, and skills-development, opportunities – benefiting the local communities. It is therefore envisaged that a Socio-Economic assessment will **not** be required.

#### **6. Hydrology Assessment and Geotechnical Assessment**

The is currently a fuel service station as well as other infrastructure listed above on site with existing fuel storage. Should the proposed mitigation measures be implemented (as per the proposed measures to be incorporated in the EMPr and DBAR), it is envisaged that a Hydrological Assessment and Geotechnical Assessment will **not** be required.

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

##### **1. Agricultural Compliance Statement**

An Agricultural Compliance Statement was undertaken to determine the agricultural sensitivity of the site and to assess whether the proposed fuel storage expansion would result in the loss of agricultural land, soil resources, or agricultural production potential. The assessment confirmed that the site is an existing, fully transformed and operational commercial property located within a built-up urban area. The site is not zoned for agricultural use and does not support any agricultural crops or activities, with surrounding land uses comprising established commercial and residential development. Based on the transformed nature of the site and the absence of viable agricultural potential, the site was confirmed to have low agricultural sensitivity, and the proposed development will not result in the loss of agricultural resources. No agricultural mitigation or monitoring measures were deemed necessary.

##### **2. Peer-Reviewed Terrestrial Biodiversity Assessment (Plant and Animal Species)**

A peer-reviewed terrestrial biodiversity assessment was undertaken to verify the plant, animal and overall terrestrial biodiversity sensitivity of the proposed development area, following elevated sensitivity ratings generated by the national environmental screening tool. The assessment confirmed that the proposed development footprint is entirely located within an existing, fully transformed and operational site, with no remaining natural or semi-natural terrestrial habitat. No plant or animal species of conservation concern were recorded or are expected to occur within the footprint, and the site does not provide suitable habitat for

conservation dependent species or listed invertebrates. The underlying vegetation type, Namaqualand Heuweltjieveld, is classified as “Least Concern” in terms of the 2022 National Environmental Management: Biodiversity Act list of threatened ecosystems. Desktop mapped Ecological Support Areas (ESA2) were confirmed to be inaccurately delineated and not reflective of current site conditions. Based on these findings, the terrestrial, plant and animal species sensitivities of the site were confirmed as low, and no biodiversity-specific mitigation or monitoring measures are required beyond restricting activities to the existing developed footprint.



### **3. Peer-Reviewed Aquatic Biodiversity Assessment**

A peer-reviewed aquatic biodiversity assessment was undertaken to assess the aquatic sensitivity of the site and to verify the condition and relevance of watercourses identified through the national environmental screening tool. The assessment identified a non-perennial drainage feature located approximately 70 m west of the proposed development footprint. This feature was confirmed to be in a poor ecological condition and to function predominantly as a stormwater conveyance channel, receiving runoff from surrounding urban development. The upper catchment of the drainage feature has been significantly modified by historical landfilling and urban development, and flow is diverted beneath the R362 road via a culvert before discharging into the Stasie Road stormwater system. The assessment confirmed that the Aquatic Ecological Support Area (ESA1) identified through desktop mapping was incorrectly delineated and does not overlap with the proposed development footprint. Provided that appropriate containment, stormwater management and spill-prevention measures are implemented, no direct or indirect impacts on aquatic ecosystems are anticipated. The aquatic biodiversity sensitivity of the site was therefore confirmed as low, and no additional aquatic specialist studies are required.

## 5. Conclusion

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In conclusion, as the site has been completely transformed and is currently in operation, the proposed expansion of fuel storage capacity is envisaged to have negligible impacts should proposed mitigation measures, to be outlined in the DBAR and EMPr, be implemented. The collective findings of the Agricultural Compliance Statement, the peer-reviewed terrestrial biodiversity assessment, and the peer-reviewed aquatic biodiversity assessment confirm that the proposed development site is fully transformed and of low environmental sensitivity. The site does not support agricultural resources, sensitive biodiversity features, or species of conservation concern, and no significant environmental constraints to the proposed development were identified. With the implementation of standard mitigation and operational controls contained in the Environmental Management Programme, the proposed installation of the above-ground fuel storage tanks is not expected to result in significant environmental impacts. Based on the factors outlined above, the proposed expansion of fuel storage capacity will have a negligible impact on the receiving environment.

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