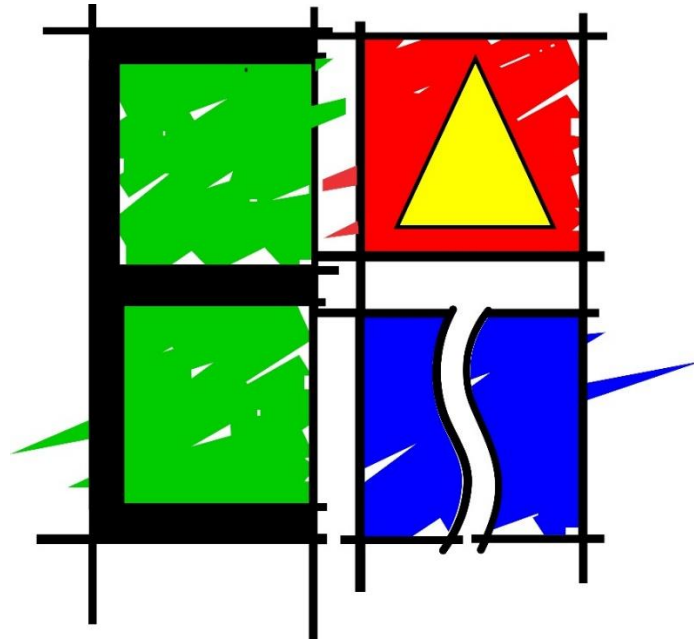

SITE SENSITIVITY VERIFICATION REPORT

PROPOSED GREATER GRABOUW HOUSING PROJECT –
PORTION A OF RE/9/313 IN GRABOUW, THEEWATERSKLOOF
LOCAL MUNICIPALITY, WESTERN CAPE



DEA&DP REFERENCE: 16/3/3/6/1/E4/11/1069/25

Report Prepared by:
Engineering Advice & Services (Pty) Ltd

Report Prepared for:
Theewaterskloof Local Municipality

October 2025

PROPOSED GREATER GRABOUW HOUSING PROJECT – PORTION A OF RE/9/313 IN GRABOUW, THEEWATERSKLOOF LOCAL MUNICIPALITY, WESTERN CAPE

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<i>Our Ref: F:\2100-2199\2191\Environmental\Erf 313\Reports\BAR Report\Final\2191 - APPENDIX L - Site Sensitivity Verification Report.docx</i>		

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INTRODUCTION & BACKGROUND

Theewaterskloof Municipality has appointed Engineering Advice and Services (EAS) to undertake a Basic Assessment Application for the proposed housing project called the Greater Grabouw Housing Project in Portion A of RE/9/313, in Grabouw, Western Cape (refer to **Figure 1**). Per the project's planning, Portion A of RE/9/313 has been identified as the next priority housing development area in the implementation of the Greater Grabouw Housing Project (**Figure 2**).

Site Description

Grabouw is the commercial centre for the vast Elgin Valley and the largest single-export fruit-producing area in Southern Africa. The town's economy is based on servicing the surrounding agricultural industry, with Elgin Valley being intensively used for viticulture and the cultivation of apples, pears, and other deciduous fruit.

The Greater Grabouw Housing Project involves the planning and implementation of approximately 7000 households in the Grabouw area. The project will entail the development of households by allocating them to the following housing project categories as applicable to the identified land parcels:

- Integrated Residential Development Programme (IRDP) Housing,
- Temporary Relocation Area (TRA) Housing,
- In-Situ Upgrading of Informal Settlement (UIS), and
- Interim Services

Project Background

Portion A of RE/9/313 is primarily a greenfield site (6,4 ha). In total, Portion A of RE/9/313 is anticipated to provide 254 housing opportunities. There are currently no formal existing internal roads and infrastructure on the site. All services and infrastructure will be installed as new. Bulk water upgrades are not required on the site, and the proposed water connections will be from the adjacent residential areas of Snake Park and Dennekruin. The area generally slopes gently to moderately from northwest to southeast, with the southern portion showing exposed

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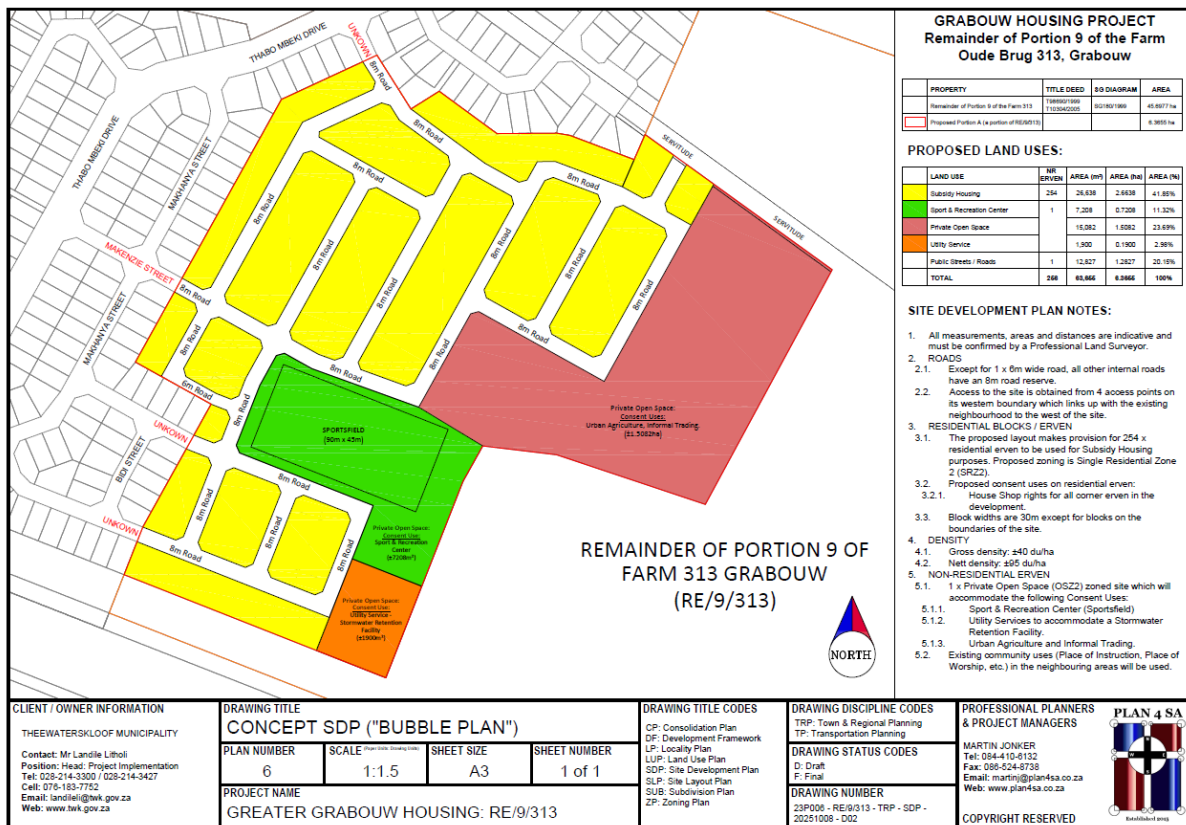


Figure 2. Concept Site Development Plan

Current site status

According to the Aquatic Biodiversity Impact Assessment by Perspective Consulting, historic aerial photography dating back to 1938 revealed that the Grabouw area was largely afforested, presumably with Pine (*Pinus pinaster*) and Blue Gum (*Eucalyptus sp.*) trees, and has since undergone deforestation, particularly to allow for the development of residential suburbs and townships, the latter which has seen expansion in recent years.

Portion A of RE/9/313 is primarily a greenfield site (6,4 ha). There are currently no formal existing internal roads and infrastructure on the site; all services and infrastructure will be installed as new. The area generally slopes gently to moderately from northwest to southeast, with the southern portion showing exposed surface outcrops. The site is largely vacant. The site is currently highly degraded, with only a few patches of degraded fynbos left. The site has been severely impacted by past forestry and urban-related activities. Large patches of grass and herbaceous weeds remain, with parts of the site converted into a sports field and livestock pens. The position of the sports field is indicated in **Figure 3** and **Figure 4** below. It is also encroached on the western and northern sides by housing. Other disturbances noted include footpaths crisscrossing the site, waste dumping, and invasive woody aliens, especially pines. Small livestock (sheep, boerbock, and pigs) grazing was also noted on and around the site



Figure 3. View across the north-western part of Portion A of RE/9/313, with the sports field visible in the distance



Figure 4. Aerial map

THE ONLINE DEA SCREENING TOOL

On 20 March 2020, the Minister of Forestry, Fisheries, and the Environment published the general requirements for undertaking site sensitivity verification for environmental themes for activities requiring environmental authorisation (Government Gazette No. 43110). In terms of these requirements, prior to commencing with a specialist assessment, the current land use and environmental sensitivity of the site under consideration by the screening tool must be confirmed by undertaking a site sensitivity verification (DEDEAT).

In accordance with the Notice of the requirement to submit a report generated by the national web-based environmental screening tool in terms of section 24(5)(h) of the NEMA, 1998 (Act No 107 of 1998) and regulation 16(1)(b)(v) of the EIA regulations, 2014, as amended, a screening tool was generated and identified specific site sensitivities and themes to be assessed for this specific project. The following specialist themes were identified:

Site Sensitivities identified (Screening Tool)

Category	Screening Tool Sensitivity
Agriculture Theme	Medium
Animal Species Theme	High
Aquatic Biodiversity Theme	Very High
Archaeological and Cultural Heritage Theme	Low
Civil Aviation Theme	High
Defense Theme	Low
Paleontology Theme	High
Plant Species Theme	Medium
Terrestrial Biodiversity Theme	Very High

Specialist assessments identified

Based on the above environmental sensitivities, as well as initial site investigations for the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report by the screening tool.

1. Landscape/Visual Impact Assessment
2. Archaeological and Cultural heritage Impact Assessment
3. Paleontology Impact Assessment
4. Terrestrial Biodiversity Impact Assessment
5. Aquatic Biodiversity Impact Assessment
6. Socio-Economic Assessment
7. Plant species Assessment
8. Animal species Assessment

Therefore, this site sensitivity verification report is compiled to determine whether Specialist Assessments or Compliance Statements for the abovementioned specialist studies are required for the proposed development.

Site Sensitivity Verification Methodology

The site sensitivity verification report compiled by Engineering Advice and Services (represented by Mr. Kurt Wicht) is based on:

- A site investigation was undertaken on 10 February 2025.
- A desktop investigation using biodiversity and land-use mapping tools such as inter alia ArcGIS and;
- Information recorded in the Screening Report
- Information derived from available specialist assessment reports.

DESKTOP ANALYSIS OF SITE

The proposed development site is located on Portion A of RE/9/313, Grabouw, Western Cape. Grabouw's climate is classified as warm and temperate and it falls within a winter rainfall region with an average temperature of 15.5°C and a mean annual rainfall of approximately 694 mm.

A screening of National Vegetation Units indicated the following as being present:

Table 1. Descriptions and implications of possible natural features

Feature	Description	Implications/Notes
Vegetation Unit (NBA, 2018)	Kogelberg Sandstone Fynbos	Critically Endangered
Western Cape Biodiversity Spatial Plan (2023)	CBA 1: Terrestrial CBA 2: Terrestrial	The site is within a CBA1 and CBA 2 area (Terrestrial).
Vulnerable Ecosystems	None	None
River or watercourses	Non-perennial tributaries are present within the development area according to the Aquatic Specialist.	The non-perennial drainage lines will be part of the public open space according to the conceptual layout plan.
32 m Buffer of Rivers or watercourses	Non-perennial drainage lines present	32m buffer of the non-perennial drainage lines will be part of the public open space according to the conceptual layout plan.
100 m Buffer of Rivers or watercourses	Non-perennial drainage lines present on site	100m buffer of the non-perennial drainage lines will be part of the public open space according to the conceptual layout plan.
500 m Buffer of Rivers or watercourses	None	None
Protected areas (PA)	None	None
Protected area buffers (5 km/ 10km)	Hottentots-Holland Mountain Catchment Area Steenbras Nature Reserve Cape Floral Region Protected Areas	The site falls outside of any protected area but falls within the 5km buffers of the Hottentots-Holland Mountain Catchment Area, and Steenbras Nature Reserve. The sites fall within the 10km buffer of the Cape Floral Region Protected Areas.
Conservation Areas (CA)	The site falls within the Kogelberg Biosphere Reserve	The site falls within the Kogelberg Biosphere Reserve

A screening of the Western Cape Biodiversity Spatial Plan indicated the following Critical Biodiversity Areas as being present:

Table 2. Critical Biodiversity Areas (WCBCP, 2023)

Feature	Description	Implication
Western Cape Biodiversity Spatial Plan (2023)	CBA 1: Terrestrial CBA 2: Terrestrial	Critical Biodiversity Areas (CBAs): Areas that are required to meet biodiversity targets for species, ecosystems or ecological processes and infrastructure. These include: • All areas required to meet biodiversity pattern (e.g., species, ecosystems) targets. • Critically Endangered (CR) ecosystems (terrestrial, wetland and river types). • All areas required to meet ecological infrastructure targets, aimed at ensuring the continued existence and functioning of ecosystems and delivery of essential ecosystem services. • Critical corridors to maintain landscape connectivity. CBAs are areas of high biodiversity and ecological value and need to be kept in a natural or near-natural state, with no further loss of habitat or species. Degraded areas should be rehabilitated to natural or near-natural condition. Only low-impact, biodiversity-sensitive land-uses are appropriate. In the maps, a distinction is made between CBAs that are likely to be in a natural condition (CBA 1) and those that are potentially degraded

SITE INSPECTION

Apart from the informal sports field and livestock pen where animals are kept, the site is currently lying vacant (**Figure 5** and **Figure 6**). Two non-perennial watercourses cross the site.



Figure 5. Informal sports field



Figure 6. Livestock pen

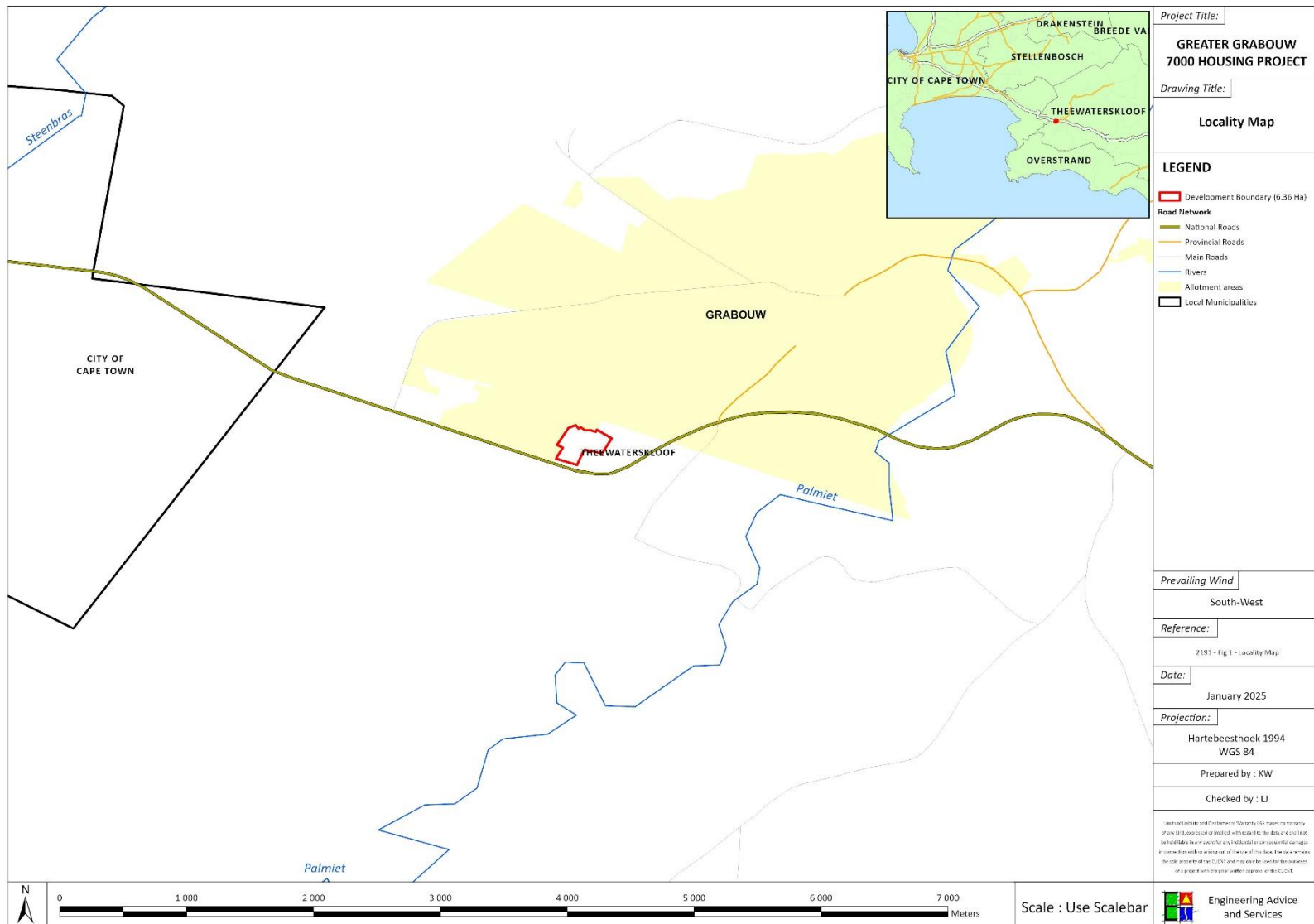


Figure 7. Locality map

DISCUSSION OF IDENTIFIED SPECIALIST ASSESSMENTS

1. Landscape/Visual Impact Assessment

It is worthwhile to acknowledge that the proposed site is partially being used as an informal sports field. Meaning the true vegetation of the site has been degraded and compromised due to this activity. The northeastern part of the site is being used as a livestock pen, where animals are being kept. Erf R/9/313 is visible from the N2 however, houses from Snake Park which is west of the site, are already in place and therefore the proposed project is in line with keeping with the surroundings and will have a low to negligible impact on the aesthetic value of the area as seen from the scenic route of the N2. The formal housing development will represent a significant improvement over the current status of the site, transforming it into a more orderly and sustainable urban environment.

The Grabouw area is riddled with informal settlements and the vacant site might be in danger of also being invaded in a few years. The proposed development will not only provide much-needed housing units but also facilitate the development of essential infrastructure, including water reticulation, sewer systems, roads, and stormwater management. These improvements will enhance living conditions and quality of life for residents while fostering community cohesion and stability. In conclusion, it is expected that this project will have only positive visual and landscape impacts on the environment. The landscape specialist study is not required for the project as the development will ensure that formalised housing units are developed for lower-income communities. The site is primarily undeveloped. Given that the land is mostly vacant or sparsely developed (with only an informal sports field), there may not be a compelling need for a dedicated landscape specialist study focused on habitat preservation or aesthetic landscape design. Additionally, if the property is left undeveloped, the informal settlement will likely expand onto this area.

2. Archaeological and Cultural Heritage Impact Assessment

Dr Peter Nilssen was appointed to submit a Notice of Intent to Develop (NID) to Heritage Western Cape (HWC). The form and accompanying documents were submitted to Heritage Western Cape on 06 February 2024. The recommendations of the Statement for the NID indicated that an Integrated Heritage Impact Assessment is not required and that **no further heritage or archaeological studies are warranted for the project**. Because the SAHRIS Palaeo Sensitivity maps show that the affected properties are within an area of HIGH and VERY HIGH sensitivity, professional palaeontologist, Prof John Pether was consulted for inputs. Prof Pether concluded as follows: "All four properties are situated on the partly outcropping Rietvlei Formation bedrock which closely underlies the surface beneath thin sandy soil. In this area, due to deformation and weathering, the default palaeontological sensitivities do not apply, and the fossil potential/sensitivity of the Rietvlei formation is LOW to MARGINAL, i.e. unlikely to produce unique fossil remains. Heritage Western Cape responded by indicating that the department has no reason to believe that the project will impact on any heritage resources and that no further action under Section 38 of the National heritage Resources Act (Act 25 of 1999) is required.

3. Paleontology Impact Assessment

The current phase only entails drilling and testing the groundwater quality of the exploration sites. The drilling activities primarily impact only the upper layers of soil and rock, reducing the likelihood of disturbing significant paleontological resources or strata where significant fossils are found. Only drilling will occur for this phase and no development will be built. Therefore, it will not be necessary to undertake a full phase 1 paleontology impact assessment from a specialist.

4. Terrestrial Biodiversity Assessment

Mr Mark Berry was appointed to undertake a Botanical Impact Assessment of the subject site. The assessment report states the following: the site lies inside Kogelberg Sandstone Fynbos. Kogelberg Sandstone Fynbos is listed as Critically Endangered (DEA, 2011). Significant portions of Farm 313/9 have been mapped as terrestrial critical biodiversity areas 1 & 2, terrestrial (CBA). About 40% of adjoining Farm 313/9 is still covered with fair to good quality fynbos, mainly on the steeper slopes and rocky areas. Significant alien infestation, especially pines and long-leaved wattle, was noted in certain places. Some pine felling was noted in the wooded areas, but this is probably for domestic purposes and not an attempt to clear aliens. The flatter areas are quite disturbed or transformed by trampling and past forestry or farming activities. Trampling has left a few areas on the steeper slopes exposed to erosion. Therefore, leaving Farm 313/9 partially transformed.

Portion A of RE/9/313 was found to be highly degraded and transformed. There were a few degraded patches of Kogelberg Sandstone Fynbos (which were determined to have “Medium” ecological value), the rest of the site had a “Very Low” ecological value. No species of conservation concern (SCC) or protected trees were recorded, and their occurrence on the site is considered unlikely. The assessment concludes that the development will have low botanical significance, and no notable cumulative impacts are anticipated (provided that alien vegetation control and construction buffers are implemented).

5. Aquatic Biodiversity Assessment

The aquatic specialist identified an ephemeral drainage line (EDL) on the western side of the site, which flows towards the Palmiet River approximately 1.3 km downstream. Although the EDL was found to be in a Seriously Modified ecological condition (PES Category E) with low ecological importance and sensitivity, it was recognised as a potential conduit for water and pollutants to the highly sensitive Palmiet River. The Palmiet River was classified as Endangered, Poorly Protected, and of Very High Ecological Importance and Sensitivity, and is designated as a Critical Biodiversity Area and Phase 2 Freshwater Ecosystem Priority Area (FEPA). Given this ecological context, the specialist emphasized the need to prevent any further degradation of the EDL that might impact the Palmiet River, particularly in terms of water quality and the spread of invasive species. The GN4167 Risk Assessment Matrix determined that all activities would pose a Low-risk significance impact on the ecological integrity of the EDL and the potentially receiving Palmiet River.

Based on these findings, the specialist recommended that the proposed development maintain a minimum 15 m ecological protection buffer around the EDL, avoid all direct disturbance to the watercourse, and implement strict mitigation during both construction and operation phases. The aquatic specialist concluded that the proposed development may be considered acceptable for authorisation, provided that all prescribed construction and operational phase mitigation measures are fully implemented. According to the freshwater assessment, the site falls within 100m of ephemeral drainage lines. The drainage line has a 32m “No-Go” boundary zone, where no development is allowed. The “No-Go” zones and ephemeral drainage lines have been accommodated within the proposed development layout as open spaces.

6. Socio-Economic Assessment

The socio-economic impact assessment weighs the socio-economic cost against the socio-economic benefit of the project on the surrounding communities of a project, depending on the scope. This includes the consequences on all participants in society and an array of different impacts such as health and employment. The EAP is of the opinion that a Socioeconomic impact study should not be required for this project. The primary objective of the project is to address housing shortages in the Grabouw area, specifically by providing affordable housing for low-income households. The social and economic goals of the project are inherently focused on improving access to housing, which may not require an extensive separate socio-economic study, as the need for affordable housing is already well understood.

7. Plant Species Assessment

Plant Species Assessment has been covered by the Botanical Impact Assessment by Mr. Mark Berry.

8. Animal Species Assessment

Considering the outcomes of the botanical report and that the site is surrounded by informal, commercial, and road developments, it is highly unlikely that any [terrestrial](#) animal species of significance will be affected by the project. [The site itself is also highly degraded and offers limited habitat value for indigenous fauna.](#) The impacts on aquatic animal species were covered in the aquatic report. The EDL is not expected to support significant aquatic biodiversity. The Palmiet downstream is expected to have only two fish species (both with moderate flow and physicochemical sensitivity), as well as a number of invertebrate species (many of which have a very high intolerance to water quality modifications). The specialist has recommended a number of mitigation measures. It is therefore concluded that a separate Animal Species Assessment or compliance statement should not be required.

CONCLUSION OF SITE SENSITIVITY VERIFICATION REPORT

Theewaterskloof Local Municipality has appointed Engineering Advice and Services (EAS) to undertake a Basic Assessment application for the proposed housing project on Portion 9 of Farm Oude Brug 313, Grabouw.

In accordance with the Notice of the requirement to submit a report generated by the national web-based environmental screening tool in terms of section 24(5)(h) of the NEMA, 1998 (Act No 107 of 1998) and regulation 16(1)(b)(v) of the EIA regulations, 2014, as amended, a screening tool was generated and identified specific site sensitivities and themes to be assessed for this specific project.

On 20 March 2020, the Minister of Forestry, Fisheries, and the Environment published the general requirements for undertaking site sensitivity verification for environmental themes for activities requiring environmental authorisation (Government Gazette No. 43110). In terms of these requirements, prior to commencing with a specialist assessment, the current land use and environmental sensitivity of the site under consideration by the screening tool must be confirmed by undertaking a site sensitivity verification. This report is regarded as the Site Sensitivity Verification Report and should guide and motivate the reasons for not including certain specialist assessments that were indicated by the screening tool as required specialist assessments.

As mentioned under *Discussion of Identified Specialist Assessments* above, it can be surmised that the following specialist assessments are necessary and have been facilitated:

- Aquatic Biodiversity Impact Assessment
- Botanical Impact Assessment

The following specialist assessments (in the opinion of the EAP) have been covered by the above assessments:

- Animal species Assessment
- Plant species Assessment
- Terrestrial Biodiversity Assessment

The following specialist assessments have been deemed not necessary (either by motivation or as confirmed by the responsible authority):

- Landscape/Visual Impact Assessment
- Socio-Economic Assessment
- Archaeological and Cultural Heritage Assessment
- Palaeontology Impact Assessment

PHOTOGRAPHIC EVIDENCE

Site Photographs

