



# Terrestrial Biodiversity Site Sensitivity Verification

As per 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 National Environmental Management Act, 1998, when applying for environmental authorisation.

## Erf 6482\_Lotus River Housing Development

**PREPARED FOR:**

CHAND Consultants cc

**DATED:**

18 September 2025

**PREPARED BY:**

NCC Environmental Services (Pty) Ltd

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## STATEMENT OF INDEPENDENCE

### DECLARATION BY THE SPECIALIST

I, **Sean Altern**, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that I:

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal, or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another specialist (the 'Review Specialist') that meets the general requirements set out in Regulation 13 has been appointed to review my work (Note: a declaration by the review specialist must be submitted);
- in terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all the requirements.
- have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any report, plan or document prepared or to be prepared as part of the application; and
- am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations, 2014 (as amended).

A handwritten signature in black ink, appearing to read 'Sean Altern', with some scribbles underneath.

Sean Altern - Senior Consultant: SHERQ Services

NCC Environmental Services (Pty) Ltd

18 September 2025

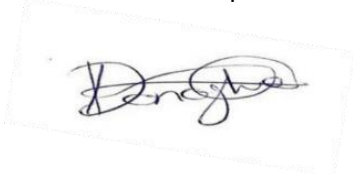
## VERIFICATION STATEMENT

This communication serves to verify that the Proposed Development report compiled by Sean Altern has been reviewed and I have verified the contents thereof.

Declaration of independence: I, **Trevor O'Donoghue** (*Pr.Sci.Nat*) with reg. no. 010184 declare that I:

- am committed to biodiversity conservation, but concomitantly recognize the need for economic development. Whereas I appreciate the opportunity to also learn through the processes of constructive criticism and debate, I reserve the right to form and hold my own opinions and therefore will not willingly submit to the interests of other parties or change my statements to appease them.
- abide by the Code of Ethics of the S.A. Council of Natural Scientific Professions.
- am contracted as specialist consultant to review the contents of this report.
- have no financial interest in the proposed development.
- have or will not have any vested or conflicting interests in the proposed development.

undertake to disclose to NCC, the applicant and authority any material information that have or may have the potential to influence the decision of the competent authority required in terms of the Environmental Impact Assessment Regulations, 2014 as amended.

A handwritten signature in black ink, appearing to read 'Trevor O'Donoghue', is enclosed in a light grey rectangular box. The signature is cursive and somewhat stylized.

**Trevor O'Donoghue** - Senior Environmental Consultant: EMC (*Pr.Sci.Nat*) reg. no. 010184

NCC Environmental Services (Pty) Ltd

18 September 2025

## STRUCTURE OF THE REPORT

This report has been prepared in accordance with the 20 MARCH 2020 PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON TERRESTRIAL BIODIVERSITY Published in Government Notice No. 320 Government Gazette 43110.

### **1.SCOPE**

This protocol provides the criteria for the assessment and minimum report content requirements for impacts on terrestrial plant species for activities requiring environmental authorisation. This protocol replaces the requirements of Appendix 6 of the Environmental Impact Assessment Regulations <sup>1</sup>.

The assessment and reporting requirements of this protocol are associated with a level of environmental sensitivity identified by the national web based environmental screening tool (screening tool). The relevant terrestrial plant species data in the screening tool has been provided by the South African National Biodiversity Institute (SANBI).

The screening tool can be accessed at: <https://screening.environment.gov.za/screeningtool>

### **2. SITE SENSITIVITY VERIFICATION AND MINIMUM REPORT CONTENT REQUIREMENTS**

Prior to commencing with a specialist assessment, the current use of the land and the environmental sensitivity of the site under consideration identified by the screening tool must be confirmed by the undertaking a **site sensitivity verification** <sup>2</sup>.

2.1 The site sensitivity verification must be undertaken by an environmental assessment practitioner or a specialist.

2.2 The site sensitivity verification must be undertaken through the use of:

- a) a desk top analysis, using satellite imagery;

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<sup>1</sup> The Environmental Impact Assessment Regulations, 2014, as promulgated in terms of Section 24(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998).

<sup>2</sup> The site sensitivity verification is to confirm the actual use of land on the ground versus that which has been identified by the screening tool. The site sensitivity verification will confirm or refute the need to employ the various specialists as identified in the screening report. The site sensitivity report does not form part of the specialist report.

- b) a preliminary site inspection; and
- c) any other available and relevant information.

2.3 The outcome of the site sensitivity verification must be recorded in the form of a report that:

- a) confirms or disputes the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.;
- b) contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity; and
- c) is submitted together with the relevant assessment report prepared in accordance with the requirements of the Environmental Impact Assessment Regulations.

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When used as a reference, the report shall be cited as: NCC Environmental Services (Pty) Ltd. 2025. Terrestrial Biodiversity Site Sensitivity Verification Statement. Lotus River Housing Development, Erf 6482, Western Cape. Unpublished report.

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# 1. INTRODUCTION

## 1.1 Scope

NCC Environmental Services (“**the contractor**”) has been contracted by Chand Consultants cc (“**the client**”) and requested to provide a Terrestrial Biodiversity Sensitivity Verification Statement for the proposed Lotus River Housing Development on Erf No 6482, Lotus River hereafter referred to as, (“**the site**”).

## 1.2 Project Description

The site is located within the suburb of Lotus River, a predominantly residential area in the southern suburbs of Cape Town, approximately 15 km from the city centre. Erf 6482 falls within a well-established urban matrix and is bordered by existing housing, community facilities, and municipal infrastructure. Unlike natural corridors such as greenbelts, the site is a disturbed and underutilised urban parcel, historically occupied by a school of which the school buildings are partially demolished and is currently vacant or informally used, and now earmarked for formal housing development.

The property lies within proximity to the Lotus River canal, a heavily modified watercourse that drains into Zeekoevlei and ultimately into False Bay. While the canal provides limited ecological function due to its hardened banks, it nevertheless represents part of the broader drainage network of the Cape Flats. Vegetation on Erf 6482 is largely transformed, consisting of ruderal grasses, with no intact remnant of the original Cape Flats Sand Fynbos that historically would have occurred in this region.

The proposed development seeks to provide high-density, affordable residential housing in response to the acute demand for formalised accommodation in Lotus River and surrounding communities (the Greater Retreat Area). The housing project is intended to integrate with existing municipal services and transport networks, improve the urban fabric by replacing vacant and under-utilised land with planned residential units, and contribute to social upliftment.

Public open space, internal roads, and service corridors will be incorporated into the development footprint to ensure accessibility and connectivity. The design will also consider opportunities for rehabilitation of green nodes or planting of indigenous vegetation along boundaries and open spaces, thereby enhancing aesthetics, providing shade, and contributing modestly to urban biodiversity within the highly modified context.

### Preferred Alternative

No alternative designs were provided at the time of this assessment (08 September 2025) which focused on the project boundary provided and assuming development of all the site.

### No-Go Alternative

The No-Go alternative for the proposed project would result in no change to the existing land use or Erf 6482, Lotus River and the *status quo* would remain - open and degraded vacant land serving no ecological or public benefit.

## 1.3 Site Screening

The projects area of influence (“**PAOI**”) or “**Development Footprint**”<sup>3</sup> is a terrestrial zone comprised almost exclusively by exotic grass and ruderal weed species such as the common exotic kikuyu grass *Pennisetum clandestinum*. Despite some scattered indigenous shrub and forb species the site does not contain any vegetation that could realistically be described as an indigenous vegetation type or represent an indigenous plant community<sup>4</sup>.

The sites PAOI is listed on the screening tool<sup>5</sup> as having, ‘**Very High**’ terrestrial biodiversity theme sensitivity features including the presence of:

- SWSA (SW)\_Table Mountain (Strategic Water Source Area)
- CR\_Cape Flats Sand Fynbos

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<sup>3</sup> Development footprint in the context of this protocol means the area on which the proposed development will take place and includes any areas that will be disturbed.

<sup>4</sup> The vegetation of South Africa has been classified by Mucina and Rutherford (2018) for the South African National Biodiversity Institute (SANBI) into over 435 different vegetation types based on diagnostic criteria such as species, assemblages and taxa in relation to geophysical and climatic variables and recorded as spatial units within the routinely updated, ‘Vegetation Map of South Africa, Lesotho and Swaziland’ or ‘VegMap’. These vegetation units are essentially identifiable and distinguishable vegetation communities which are accepted by South African National Biodiversity Institute (SANBI), government gazetted and supported by a network of ecologists, biologists, and conservation planners as recognizable plant community ecosystems to which varying levels of threat, developmental and conservation planning considerations and stipulations have been applied based on facets such as remaining extent of each unit and threatening processes. The vegetation type is defined in terms of dominant, common as well as rare species, as well as association with landscape features such as soil or geology, topography and climate (<https://pza.sanbi.org/vegetation>).

<sup>5</sup> Based on the Red List of Ecosystems (RLE) for terrestrial realm for South Africa.

It is on account of broader scale biodiversity spatial planning and large ecological attributes (ecosystem types, ecological drivers, functions, corridors, status <sup>6</sup>, significant terrestrial landscape features etc) which this Terrestrial Biodiversity report focuses on and **NOT** fine scale aquatic, fauna or flora as these have their own specific reporting protocols. Rather this Terrestrial Biodiversity report engages with the broader terrestrial elements, qualities, and ecological purpose(s) of the area.

In terms of indigenous plant species, the few noted on the site are all, 'Least Concern' ("**LC**") and no, 'Species of Conservation Concern' ("**SCC**") <sup>7</sup> were noted or are (with high confidence) deemed likely.

As per the protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Biodiversity published in Government Notice No. 320 in Government Gazette 43110 on 20 March 2020, by which this report is compiled, the stipulated screening tool result generated a, '**Very High**' sensitivity rating for Terrestrial Biodiversity (refer to **Figure 1**). Best practice methodology as per the 20 March 2020, protocol <sup>8</sup> dictates that the highest sensitivity rating for any part of the site is ascribed to entire "the site" as a whole <sup>9</sup>.

This site sensitivity verification however **refutes** the screening tool result of, 'Very High' Terrestrial Biodiversity for the site <sup>10</sup> and affirms that the site is in fact of, '**Low**' Terrestrial Biodiversity sensitivity thereby resulting in a Terrestrial Biodiversity Compliance Statement being the prescribed report required <sup>11</sup>.

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<sup>6</sup> Western Cape Biodiversity Spatial Plan 2017

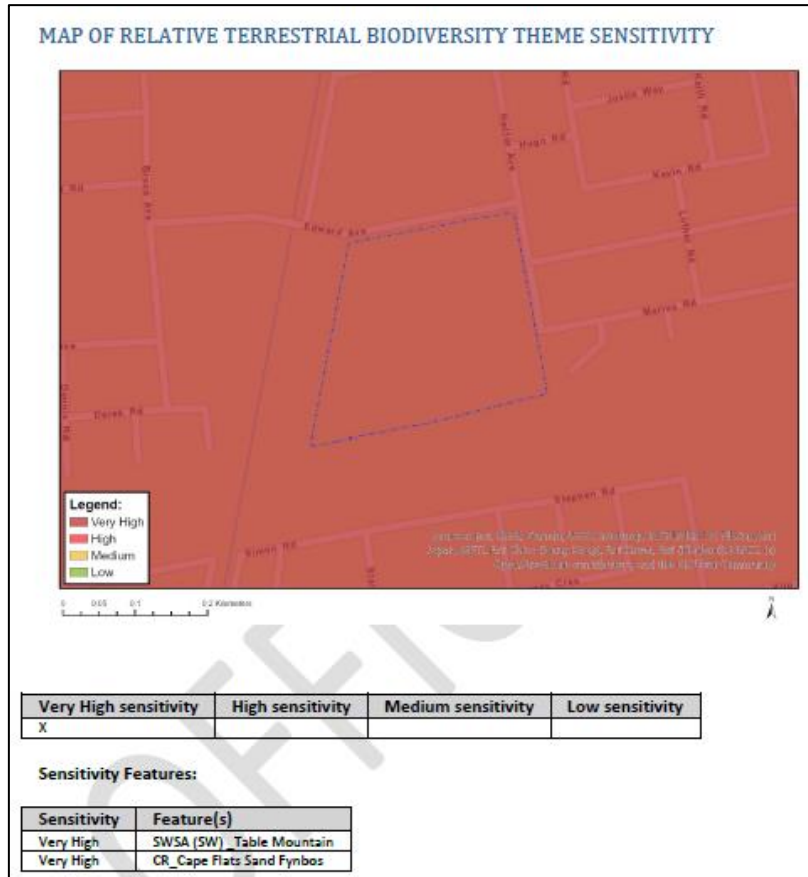
<sup>7</sup> Species of conservation concern are species that have a high conservation importance in terms of preserving South Africa's high floristic diversity and include not only threatened species, but also those classified in the categories Extinct in the Wild (EW), Regionally Extinct (RE), Near Threatened (NT), Critically Rare, Rare, Declining and Data Deficient - Insufficient Information (DDD). South African National Biodiversity Institute (SANBI) 2010-12.

<sup>8</sup> No. 320, GOVERNMENT GAZETTE 43110

<sup>9</sup> If any part of the proposed development footprint falls within an area of "very high" sensitivity, the assessment and reporting requirements prescribed for the "very high" sensitivity apply to the entire footprint

<sup>10</sup> Terrestrial Biodiversity Theme reporting protocol is different from Animal, Plant and Aquatic Species Theme.

<sup>11</sup> 1.3. However, where the information gathered from the site sensitivity verification differs from the designation of "very high" terrestrial biodiversity sensitivity on the screening tool and it is found to be of a "low" sensitivity, then a Terrestrial Biodiversity Compliance Statement must be submitted. (No. 320 GOVERNMENT GAZETTE 43110 20 MARCH 2020)



**Figure 1:** <https://screening.environment.gov.za/screeningtool> produces a result of, 'Very High' Terrestrial Biodiversity Theme Sensitivity for the proposed Lotus River Housing Development.

## 2. ANALYSIS

### 2.1 Desktop Analysis

The sites PAOI is listed on the screening tool <sup>12</sup> as having, '**Very High**' terrestrial biodiversity theme sensitivity features based on the "listed" presence of the following attributes:

➤ **SWSA (SW)\_Table Mountain (Strategic Water Source Area - Surface Water)**

- Strategic Water Source Areas (SWSAs) refer to the 10% of South Africa's land area that provides a disproportionate 50% of the country's water runoff. Understanding where these SWSAs are,

<sup>12</sup> Based on the Red List of Ecosystems (RLE) for terrestrial realm for South Africa.

is therefore crucial to planning and management of water resources, including the ecosystems that support water quality and quantity. The 2021 spatial layer for SWSAs for surface water is a fine-scale delineation of the SWSAs, intended to support the integration of SWSAs in a range of catchment- and local-level planning, management, and regulatory processes <sup>13</sup>.

- The site falls well within the mapped-out extent of the Table Mountain SWSA along with the vast area of the Cape Town Metropole, particularly the Cape Peninsula (refer to **Figure 2**). This is therefore very broad scale spatial data as it includes even completely built-up areas or transformed areas where the level of biodiversity is, or could be, non-existent.



**Figure 2:** The site falls within the broad Table Mountain SWSA for surface water (see red arrow).

<sup>13</sup> Lötter, M.C. & Le Maitre, D. (2021) Fine-scale delineation of Strategic Water Source Areas for surface water in South Africa using Empirical Bayesian Kriging Regression Prediction: Technical report. Prepared for the South African National Biodiversity Institute (SANBI), Pretoria

➤ **CR\_Cape Flats Sand Fynbos (Vegetation Type)**

- The SANBI Red List of Ecosystems: Original dataset contains the historical / potential extent (circa 1750) of each of the 458 ecosystem types assessed. This represents a revision of the “List of terrestrial ecosystems that threatened or in need of protection” published in the government gazette in December 2011. The revision is based on the best available data and used the IUCN RLE risk assessment framework version 1.1 (Bland *et al.*, 2017). Ecosystem are categorised into one of four classes representing their risk of collapse; in descending order of risk: Critically Endangered, Endangered, Vulnerable, Least Concern. The national vegetation map, 2018 version (Mucina and Rutherford 2006; Dayaram *et al.*, 2019) provided the units of assessment for the RLE (Vegetation Unit / Type level).
- The site has been ascribed, **‘Very High’** Terrestrial Biodiversity Theme Sensitivity status from the online screening tool because it is suggested to historically comprise ‘Critically Endangered’ (“**CR**”) Cape Flats Sand Fynbos (FFd5) and as it has not been developed the assumption is that some of this may remain.
  - Cape Flats Sand Fynbos (FFd 5) is listed as Critically Endangered (“CR”) under criteria B1(i), B1(iii) which relate to a restricted distribution, rate of loss, as well as ongoing threatening processes such as urban development, agriculture, and invasive alien plant encroachment.
  - Cape Flats Sand Fynbos (FFd 5) is also recorded as having approximately 220 Red Data (“SCC”) plant species (EX, EW, CR, EN & VU excl. VU D2) present within its distribution range, making it one of the most species-rich and conservation-priority ecosystems in South Africa.
  - In addition, Cape Flats Sand Fynbos (FFd 5) supports at least 19 endemic plant species, many of which are restricted to isolated remnant patches, such as Kenilworth Racecourse Conservation Area, Edith Stephens Nature Reserve, and Tokai Park (Government Gazette 34809, Republic of South Africa, 2011).
- Accordingly, any areas that have not been legally ploughed within the last 10 years (or are seen to be ‘undeveloped’) are considered by the screening tool to (still) be the historical

'indigenous vegetation types' that are listed and mapped as having historically, and probably, occurring there according to Mucina and Rutherford/VegMap 2018 <sup>14</sup>.

- Thus, the site, which is undeveloped is therefore considered by the screening tool as one comprising "CR" Cape Flats Sand Fynbos (FFd5). With this ascription, and based on the screening tool algorithm, the expectation is that some of the red data species, which are typically found within the units, are likely to be found there as well.
- It is based on these ascriptions given to the site (historical vegetation type(s), protected status etc.) that the screening tool sensitivity rating of 'Very High' terrestrial biodiversity theme sensitivity for the site has been ascribed.
- This ascription of 'Very High' however **requires 'unpacking'/ground truthing** <sup>15</sup> to determine whether the 'desktop' result(s) ascribed by the screening tool is an accurate ascription for the site (and thereafter whether a Terrestrial Biodiversity Compliance Statement or Terrestrial Biodiversity Specialist Assessment is required). This is based on understanding why the ascriptions are given and if they are accurate (i.e. is the site still the listed vegetation type or does it fulfil the role of the SWSA status ascribed to it?). These facets are unpacked in more detail within the following report however, a general and brief assessment on certain features is provided in this site sensitivity verification in order to legitimize which following report type is required.
- The Western Cape Biodiversity Spatial Plan 2023 Other Natural Areas. The Western Cape Biodiversity Spatial Plan ("WCBSP") is the product of a systematic biodiversity planning assessment that delineates Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) which require safeguarding to ensure the continued existence and functioning of species and ecosystems, including the delivery of ecosystem services, across terrestrial and freshwater realms. These spatial priorities are used to inform sustainable development in the Western Cape Province. This product replaces all previous systematic biodiversity planning products and sector plans with updated layers and features.

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<sup>14</sup> Indigenous vegetation, by definition, refers to, 'vegetation consisting of indigenous plant species occurring naturally in an area, regardless of the level of alien infestation and where the topsoil has not been lawfully disturbed during the preceding 10 years' (Environmental Impact Assessment Regulations: Listing notice 3 of 2014)

<sup>15</sup> Ground truthing is the process of gathering and confirming data from the real world to verify remotely collected data

Significantly, the site is **not** included in any of the WCBSP levels (Critical Biodiversity Area “**CBA**”, Ecological Support Area “**ESA**”, Other Natural Area “**ONA**”) thus suggesting that conservation authorities deem the site to have no or low terrestrial biodiversity and conservation value (refer to **Figure 3**).



**Figure 3:** The Western Cape Biodiversity Spatial Plan does not include the Lotus River Housing Development Site even on the lowest end of the conservation planning spectrum as an Other Natural Area (ONA) **CapeFarmMapper**.

- Historical satellite imagery (refer to **Figure 4**) was also obtained (courtesy Google Corporation) to investigate historical land use for the study area to attempt to deduce what, if any of these land use changes are notable - No significant changes are observable between the years 2000 – 2025. Apart from the buildings having been partially demolished or fallen into disrepair, there does not appear to be any visible vegetation structure changes such as shrubbery changing to grass. Rather this has remained constant (at least since 2000) and is indicative that the fynbos community that once was here has long since been removed. Fynbos communities are

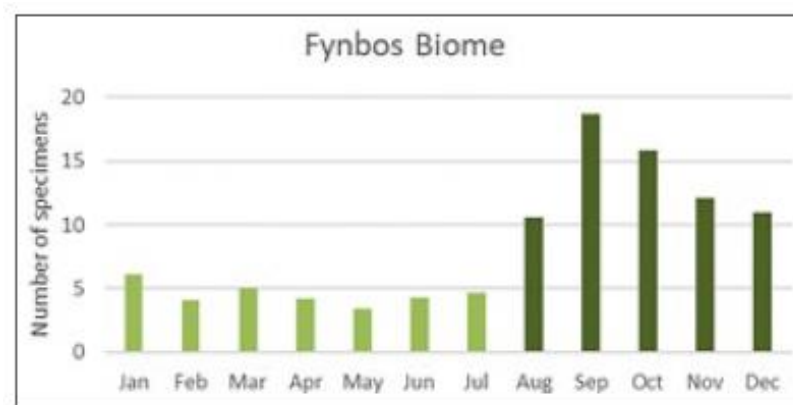
shrub based (observable on satellite imagery as dots or pattern) and throughout the available years the site is seen as one comprising exotic grasses instead (**Figure 4**). No corridor movement would be impeded by the proposed development as this is still available to the west (along the canal) and south sides of the site.



**Figure 4:** The proposed Lotus River Housing Development site in the years 2000 (top) and 2025 (below) indicate that parts of the site were once better developed and have since fallen into ruin whilst the undeveloped areas to the west have comprised the same homogenous grass visage (**Google Earth**).

## 2.2 Preliminary Site Inspection

- The site was inspected on 07 September 2025 and, along with very few indigenous species, no SCC were noted on the site. Plant surveys in the Fynbos Biome are best undertaken in spring (refer to **Figure 5**). This site sensitivity verification was undertaken in spring, which is ideal. Even though certain species are present at differing times of the year based on the state of the site, which is completely transformed, the likelihood of SCC's being present during other seasons is very low - SCC's are rare because of the specific habitat requirements and their sensitivity to change. As such they are often the first species within a vegetation community to disappear which accounts for them becoming rare or a 'SCC'. As such if, as is the case, the fynbos community of the site has all but disappeared it is safely inferred that SCCs are the most unlikely to have remained.



**Figure 5:** Plant assessment and collection month summary in the fynbos biome indicates optimal survey periods. BRAHMS online database. <http://posa.sanbi.org/>

- The key indicators used to monitor ecosystem health, as per the recommendations of the Fynbos Forum, 2019, Version 2 Ecosystem Guidelines for Environmental Assessment in the Western Cape include the include density of invasive species, the indigenous plant cover (its type, age and ecological condition), species richness, and the presence of key guilds of species, the abundance and distribution of populations of threatened species and others of conservation concern (consult the Red List of South African Plants - Raimondo *et al.*, 2009 and signs that appropriate fire regimes are being applied were considered.

- For instance, the historical indigenous vegetation (Cape Flats Sand Fynbos) suggested to have been present on the site is described as, 'A species-rich, medium-tall to tall fynbos shrubland, with a well-developed restioid component and a notable presence of annuals and geophytes. The vegetation is typically dominated by members of the Proteaceae, Restionaceae and Ericaceae, interspersed with patches of asteraceous and ericaceous shrubs. The structure varies from dense, closed-canopy shrubland to more open restioid-dominated stands on deeper sands.' (Mucina and Rutherford, 2018).
- The site inspection affirms that there is no Cape Flats Sand Fynbos as a vegetation type left on the proposed development footprint. Despite a few individual indigenous plant species being present on the site the required assemblages, composition and strata of the vegetation types are all absent. The entire site is in fact overrun with exotic alien grasses such as *Pennisetum clandestinum*, *Avena fatua* and weedy shrub including *Echium plantagineum*. Along with the lack of appropriate floral species noted it is evident that crucial ecosystem drivers such as appropriate fire regime required for the survival of authentic fynbos vegetation communities are absent from this urban parkland.
- Indigenous 'Least Concern' species such as bitou *Osteospermum moniliferum* and night phlox *Zaluzianskya capensis* are noted on the site however these are isolated and do not form a community. Despite these isolated species nothing which could be described as an indigenous terrestrial vegetation type or ecosystem is present (**Figures 6 and 7**). Along with the lack of indigenous vegetation as a 'type', no SCC's were found on the development footprint, or are expected to occur, based on the current and past state of the site.



**Figure 6:** The site has been transformed into an exotic field comprising mostly kikuyu *Pennisetum clandestinum*, wild oats *Avena fatua* and weedy shrubs including Patterson’s curse *Echium plantagineum* seen as darker gray patches above (**Altern, September, 2025**).



**Figure 7:** Variance across the site is limited and is dominated by a few exotic species. Constant degradation such as informal dwellings is present and biodiversity, both floral and faunal is subsequently deemed to be low (**Altern, September, 2025**).

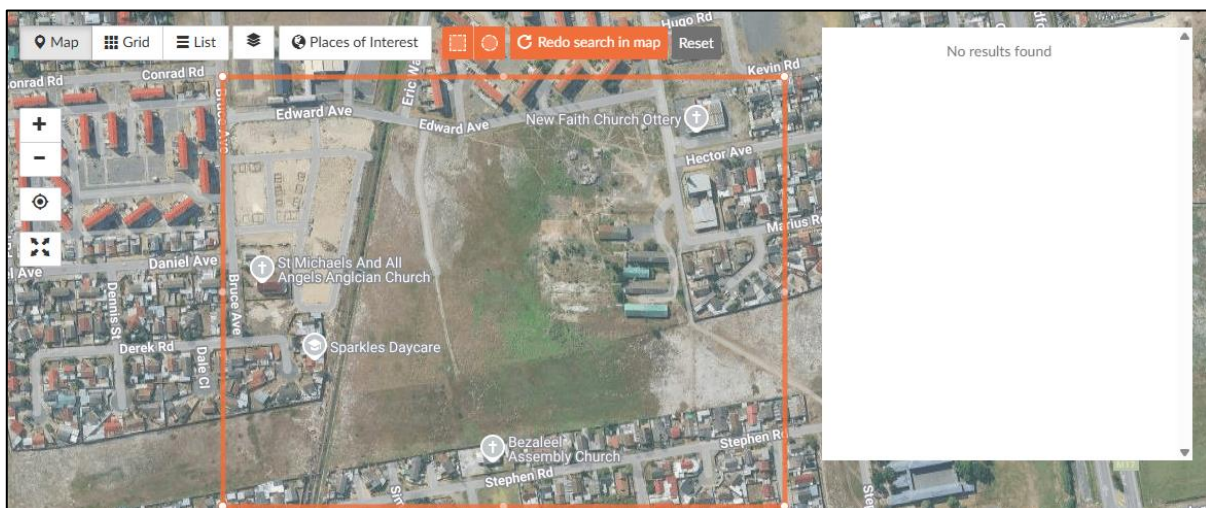
- Biodiversity needs to be considered in terms of baseline habitat as in certain environments low numbers of species may represent very healthy or pristine environments for that habitat type. The site, even though comprising a mixture of vegetation, is essentially completely transformed into a grassy swathe of mostly exotic and alien weeds. High biodiversity is directly associated with the available habitat and as none of the natural high biodiversity vegetation

type (Cape Flats Sand Fynbos) remains it can be accurately inferred that overall biodiversity, that which includes faunal aspects, is highly reduced from what it once was and is now very limited or 'Low' for that area/original ecosystem.

### 2.3 Any other available and Relevant Information.

The iNaturalist website which collates 'citizen science' records of species and their locations was examined. This online database provides community based anecdotal records of species and is useful for providing a general impression of an area. This is done with caution as the data, even 'Research Grade' which has a community verified status, can be somewhat inaccurate in terms of exact locality used and species identifications.

There are no iNaturalist records of any species, whether indigenous species or exotic, floral or faunal on and around the site. The lack of records does not automatically equate with their absence however, no species recorded here is a telling sign of the state of the local ecology (**Figure 8**). The overall impression provided by online databases correlates with the site assessment and biodiversity spatial planning datasets (WCBSBP) that the area is that the general biodiversity of the site is 'Low'.



**Figure 8:** Inaturalist online database (2025) has no records for the site suggesting that ecological diversity is limited or 'Low'.

### 3. OUTCOME

- The proposed Lotus River Development site is no longer the historically listed CR Cape Flats Sand Fynbos nor any other indigenous vegetation type - This vegetation type has been completely removed through consistent negative impacts (dumping and invasive alien plant IAP invasion) and lack of positive vegetation drivers (appropriate fire regime) and the site now represents a transformed environment comprising almost exclusively exotic species such as a grassy field;
- The change in habitat (Cape Flats Sand Fynbos) to exotic grass field has resulted in significantly reduced flora biodiversity and associated significantly reduced faunal biodiversity;
- There is no obvious ecological role for the site in terms of corridor movement and even if this was the case the Lotus River canal to the west remains unimpeded as does the greenbelt to the south;
- The Western Cape Biodiversity Spatial Plan (“**WCBS**P”) and City of Cape Town Biodiversity Spatial Plan do not afford the site ANY status (whether as a ‘Critical Biodiversity Area’ or, at the lower end of the planning spectrum as a ‘Other Natural Area’ and this is highly significant in showing that the site has very low terrestrial biodiversity and, subsequently, conservation value.
- The fact that the site is within a SWSA is not significant as this is a broad scale ‘layer’ that encompasses even urbanised areas and does not equate to, or have significant bearing on, terrestrial biodiversity levels.

### 4. CONCLUSION

Due to the long term transformed nature of the site - fynbos to low biodiversity exotic grassed field (as noted in historical satellite imagery and confirmed via physical site assessment) - compounded by the existing negative influences (invasive alien plant proliferation, trampling) and lack of positive appropriate vegetation drivers (appropriate fire regime) as well as the noted absence of the site on the WCBS P the site is considered to have ‘**Low Sensitivity**’ for terrestrial biodiversity.

The screening tool result of the site being of, “Very High Sensitivity” for terrestrial biodiversity is therefore refuted, and the site is confirmed to in fact be of ‘Low’ Terrestrial biodiversity.

This means that as per Section 1.3 of the GN.320 No 43110 of 20 March 2020 that, 'where the information gathered from the site sensitivity verification differs from the designation of "very high" terrestrial biodiversity sensitivity on the screening tool and it is found to be of a "low" sensitivity, then a Terrestrial Biodiversity Compliance Statement must be submitted'.

## 5. REFERENCES

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