APPENDIX O2 – SITE SENSITIVITY VERIFICATION REPORT

Prepared by: PHS Consulting

SITE SENSITIVITY VERIFICATION REPORT:

SECTION 24G APPLICATION FOR THE DENSIFICATION OF THE APPROVED RESIDENTIAL DEVELOPMENT ON ERF 3733, MANDALAY

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1. INTRODUCTION AND BACKGROUND

This report aims to verify the site sensitivity for Erf 3733, Mandalay. Erf 3733, Mandalay is located within the City of Cape Town Metropolitan Municipality, approximately 5 km south-southeast of Cape Town International Airport and approximately 580 m east of Mitchells Plain District Hospital. The property is approximately 4,9ha in size (Figure 1).

The proposed development comprises a social housing project, as contemplated in the Social Housing Act, 2008 (Act 16 of 2008), and entails an increase in residential density from approximately 521 apartment units, as authorised in terms of NEMA through the Environmental Authorisation issued in 2011 (and amended in 2021), to 770 apartment units. The proposed development also includes associated engineering infrastructure, a neighbourhood retail component, and a crèche.

Implementation of the proposed densified social housing development was initiated by means of the unauthorised piping of portions of Wetland 7 beyond the extent authorised under the existing Environmental Authorisation, which enabled the revised development footprint. Accordingly, retrospective Environmental Authorisation is sought through this Section 24G application for the proposed densified layout as per Figure 2.

The following activities have already taken place on site:

- Authorised vegetation clearance and earthworks associated with the implementation of the authorised development on the original Erf 776, Mandalay (lawful)
- Piping of Wetland 7, including the additional extent beyond that authorised under the existing Environmental Authorisation, which facilitated the revised development layout and constituted the commencement of the proposed densified development (unlawful).

The following activities are linked to the unlawful commencement of the development and form part of this Section 24G application:

- Development of the City of Cape Town approved densified social housing development comprising an increase in residential density from approximately 521 apartment units to approximately 770 apartment units.
- Inclusion of a small retail space and a crèche on the ground floor of one apartment block.
- Construction of internal infrastructure, roads, stormwater infrastructure, engineering services, boundary walls, landscaping, recreational facilities (braai & play areas), a refuse allocation area, communal washing and drying facilities, and ancillary works required to complete the approved densified development.

The information contained in this report was ground truthed by means of a site visit that was conducted on the 10th of June 2026 by Olivia Venter (EAPASA: No. 2023/6743).

Access – Access to the site is existing. Internal roads and associated engineering services will be developed in accordance with the City of Cape Town-approved Site Development Plan (Figure 2). The original Environmental Authorisation authorised "internal roads and associated infrastructure" without prescribing a fixed road alignment or layout for Erf 3733. The proposed internal road network as per Figure 2 will provide access to the proposed residential development, associated parking, retail component, crèche and supporting infrastructure.

Electricity – Electricity will be provided by the City of Cape Town. The supply will be made available from the Montclair Protected Substation, situated adjacent to the proposed development

Sewage – Sanitation services will be provided by the City of Cape Town. New service connections will be installed to connect the proposed development to the City of Cape Town's existing sanitation networks.

Water – Water supply services will be provided by the City of Cape Town. A new combined domestic/fire water connection will be used and installed.

Domestic waste – Refuse removal will be undertaken by the CoCT.



Figure 1: Locality Map – Erf 3733 Mandalay



Figure 2: Proposed Site Development Plan for Erf 3733, Mandalay

2. EIA TOOLKIT REPORT RESULTS

The Site Screening report was based on the placement of the entire development footprint. It should therefore be noted that while certain areas may have a lower sensitivity rating than indicated overall, the DEA screening tool automatically reverts to the highest sensitivity for the block area drawn. The Screening Tool Report assigned the following sensitivity ratings to the development footprint:

2.1. Agriculture Theme (High Sensitivity)

The screening tool report generated for the property indicates that the site is classified as having a 'high' agricultural sensitivity (**See Figure 3**). However, the site is zoned General Residential 2 (GR2), forms part of an established urban area, and is surrounded by residential development, healthcare facilities, roads, railway infrastructure and other urban uses. The property has not been used for agricultural purposes and has been progressively transformed through urban development and associated infrastructure. Importantly, the 2011 Environmental Authorisation authorised the development of residential and associated urban uses on the broader property, confirming the site's intended transition from undeveloped land to an urban development area. The application site is highly disturbed and does not comprise cultivated land or active agricultural production. The proposed development is for densification of an approved residential development within an established urban footprint and does not represent the loss of agricultural land. In light of these factors, it is reasonable to conclude that the site should not be regarded as having high agricultural sensitivity, as it has undergone a significant transition to an urban landscape in which agriculture is neither the dominant nor intended land use and residential development has already been authorised onsite.

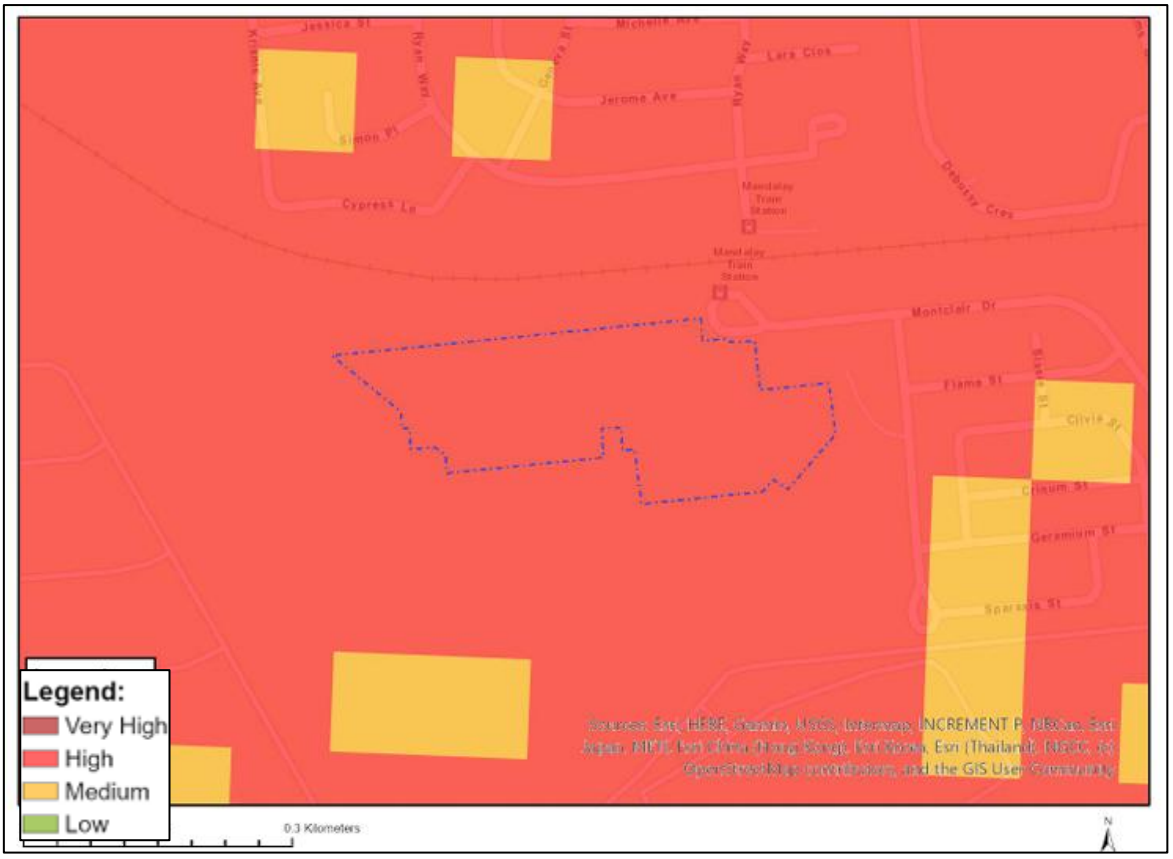


Figure 3: Agricultural Sensitivity. Erf 3733 is shown as blue dotted lines.

2.2. Animal Species Theme (Medium Sensitivity)

The majority of Erf 3733 is mapped as 'low' sensitivity for animal species, however a patch of 'medium' animal species sensitivity is noted in the east of the site (**See Figure 4**) due to the following sensitivity features:

- Medium Sensitivity: Mammalia-Mystromys albicaudatus (White-tailed rat)

The Screening Tool reverts to the highest sensitivity within the development footprint. However, the medium sensitivity identified by the Screening Tool is not considered to warrant further specialist assessment given the highly disturbed urban context of the site. The previous EIA, which resulted in Environmental Authorisation for development of the broader property, did not identify any animal species of conservation concern within the development area. The site has since undergone further urban transformation and does not comprise intact natural habitat. No additional evidence or indicators have been identified to suggest that the site currently supports habitat of elevated sensitivity. The EAP therefore considers that the available information is sufficient to assess potential impacts on animal species and that no further specialist assessment is warranted.

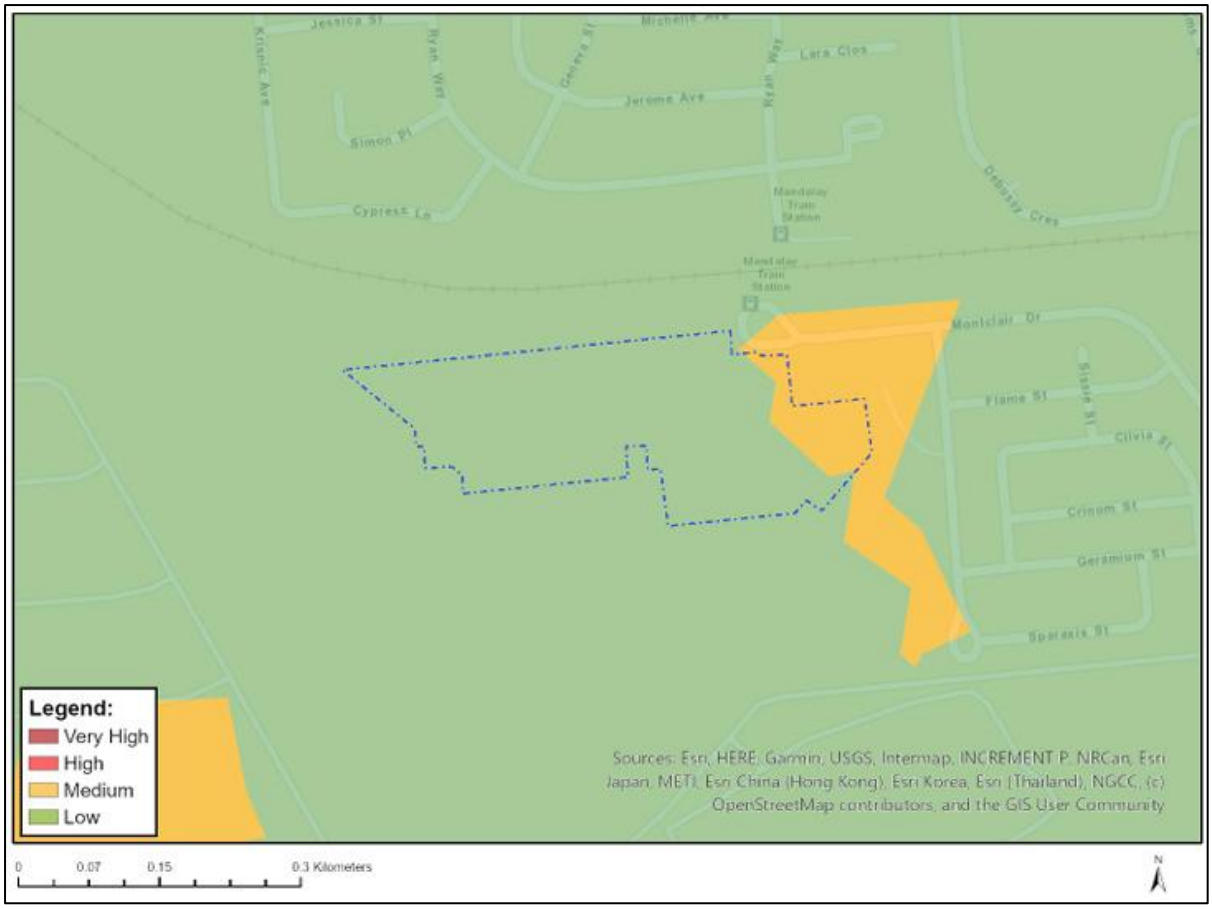


Figure 4: Animal Species Sensitivity. Erf 3733 is shown as blue dotted lines.

2.3. Aquatic Biodiversity Theme (Very High Sensitivity)

Several patches of 'very high' aquatic biodiversity sensitivity are identified within Erf 3733, Mandalay (see **Figure 5**), based on the desktop identification of depression wetlands. While the majority of the property is mapped as 'low' aquatic biodiversity sensitivity, the Screening Tool applies the highest sensitivity within the site. Given the identified aquatic sensitivity, an aquatic specialist, Toni Belcher, was appointed during the original EIA process in 2008 to assess the aquatic features on the broader property (Erf 776 at the time). The assessment identified several wetlands, the majority of which were authorised for infilling within the 2011 EA, with Wetland 3 and a portion of Wetland 7 retained. An updated freshwater ecological assessment was subsequently undertaken by FEN Consulting to assess the current aquatic features within Erf 3733 and the impacts associated with the unauthorised development activities. The assessment disputes the 'very high' aquatic biodiversity sensitivity assigned by the DFFE Screening Tool and recommends that the sensitivity be reduced to 'low', based on the absence of natural freshwater features within the study area. The 'low' aquatic biodiversity sensitivity assigned to the remainder of the study and investigation areas, where no freshwater ecosystems have been delineated, is not disputed by the site verification and is therefore confirmed. Please refer to Appendix H1 of the application for further information.

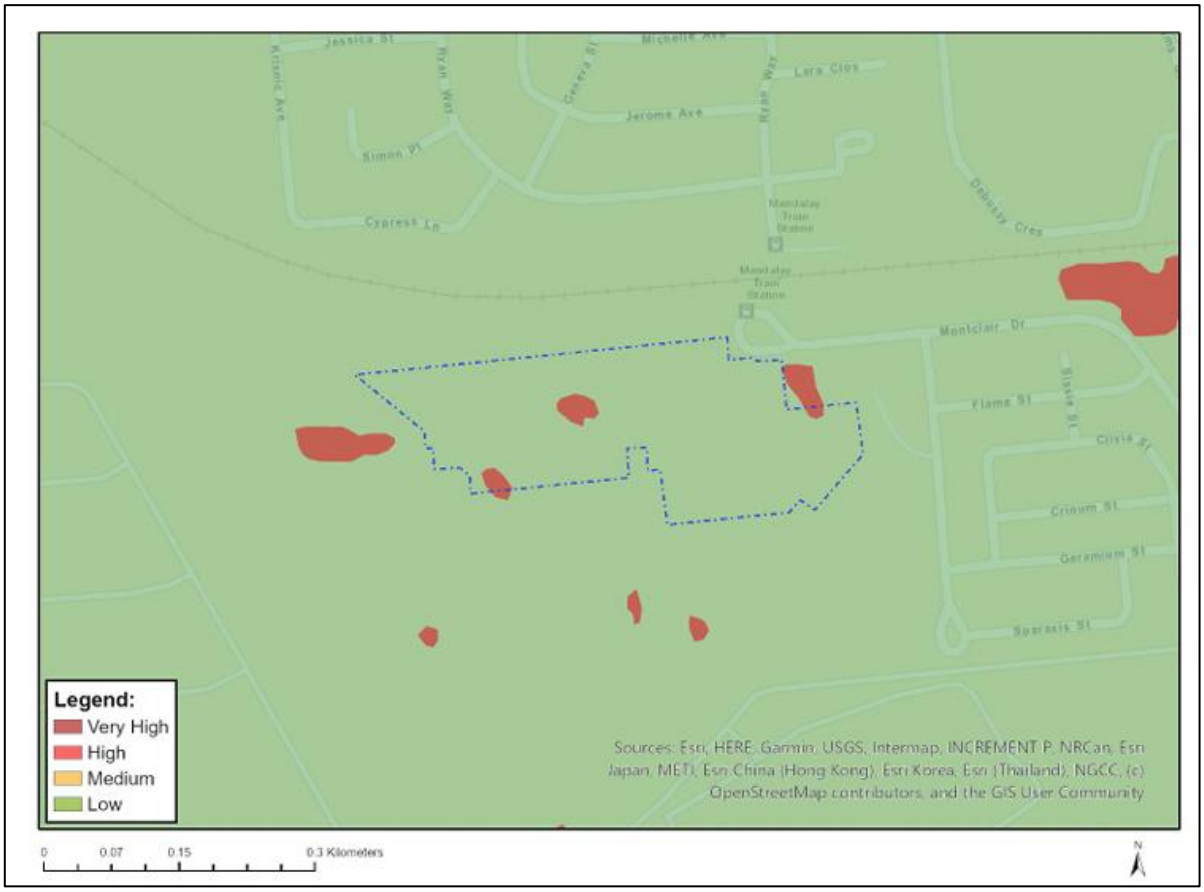


Figure 5: Aquatic Biodiversity Sensitivity. Erf 3733 is shown as blue dotted lines.

2.4. Archaeological and Cultural Heritage Theme (Very High Sensitivity)

This theme is identified and mapped as 'low' across the vast majority of Erf 3733 (**See Figure 6**) with a small portion of the southwestern corner protruding into an area of 'very high' archaeological and cultural heritage sensitivity. The heritage assessment undertaken for the broader Erf 776 as part of the 2011 EIA application did not identify any significant heritage resources within the development area. Erf 3733 formed part of the original Erf 776 and the proposed development remains within the previously assessed urban development footprint. A NID was submitted to HWC as part of the original EIA application for Erf 776 and the final comments from HWC confirmed that no further assessment was required. The previous findings are therefore considered applicable, and no further heritage specialist assessment is warranted. However, as per the HWC final comment, should any heritage remains be discovered during works onsite, works will be stopped and HWC notified immediately.



Figure 6: Archaeological and Cultural Heritage Sensitivity. Erf 3733 is shown as blue dotted lines.

2.5. Civil Aviation Theme (Very High Sensitivity)

This theme is identified as 'very high' sensitivity due to the site's location within the applicable civil aviation sensitivity zones (see **Figure 7**), including its proximity to a major civil aviation aerodrome and associated aviation infrastructure. The development of Erf 776, which included Erven 3303 and 3304, is subject to an existing Environmental Authorisation, and the current development remains within the previously assessed and authorised urban development area, with the proposed changes relating primarily to increased residential density and associated land uses. The proposed buildings will remain below 15 m in height and will not introduce structures or activities expected to interfere with aviation operations, flight paths or airspace safety. Given the nature, scale and location of the proposed development, no significant aviation-related impacts are anticipated and no further aviation specialist assessment is considered warranted.



Figure 7: Civil Aviation Sensitivity. Erf 3733 is shown as blue dotted lines.

2.6. Defence Theme (Medium Sensitivity)

A 'medium' sensitivity has been assigned to the property (**See Figure 8**) due to its proximity to a military and defence site. The site is located within an established urban area, approximately 6 km from the South African Infantry Battalion Base in Khayelitsha. The development is subject to an existing Environmental Authorisation, and the current development remains within the previously assessed urban development area, with the proposal involving an increase in residential density and associated commercial uses. The nature and location of the development are not expected to result in any additional impacts on defence infrastructure or operations. Accordingly, no significant defence-related impacts are anticipated, and no further defence specialist assessment is considered warranted.

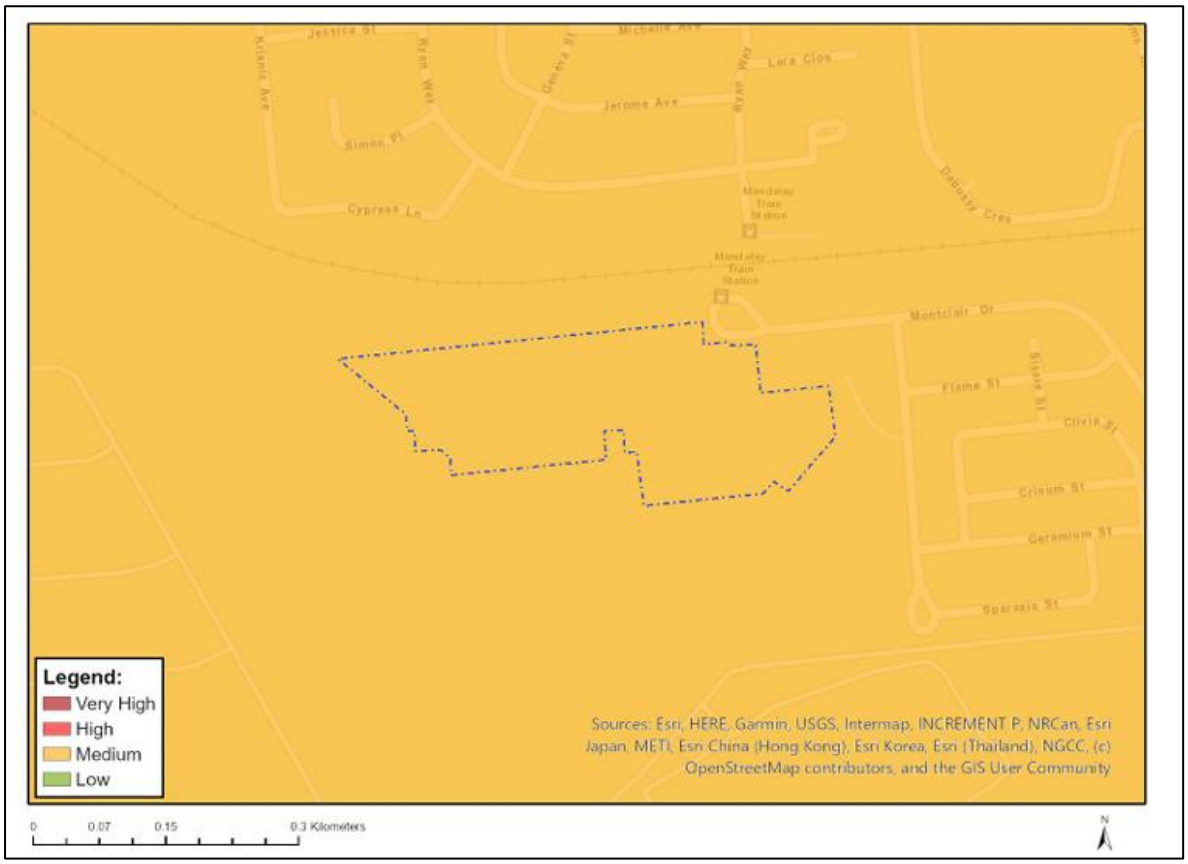


Figure 8: Defence Sensitivity. Erf 3733 is shown as blue dotted lines.

2.7. Palaeontology Theme (Medium Sensitivity)

The screening tool report indicates that Erf 3733 Mandalay has a 'medium' palaeontological (**See Figure 10**). A NID was submitted to HWC as part of the original EIA application for Erf 776 and the final comments from HWC confirmed that no further assessment was required. Erf 3733 formed part of the original Erf 776 and the proposed development remains within the previously assessed urban development footprint. The previous findings are therefore considered applicable, and no further specialist assessment is warranted. It is however recommended that the HWC Fossil Finds Procedure must be implemented and this will be included in the EMPr.

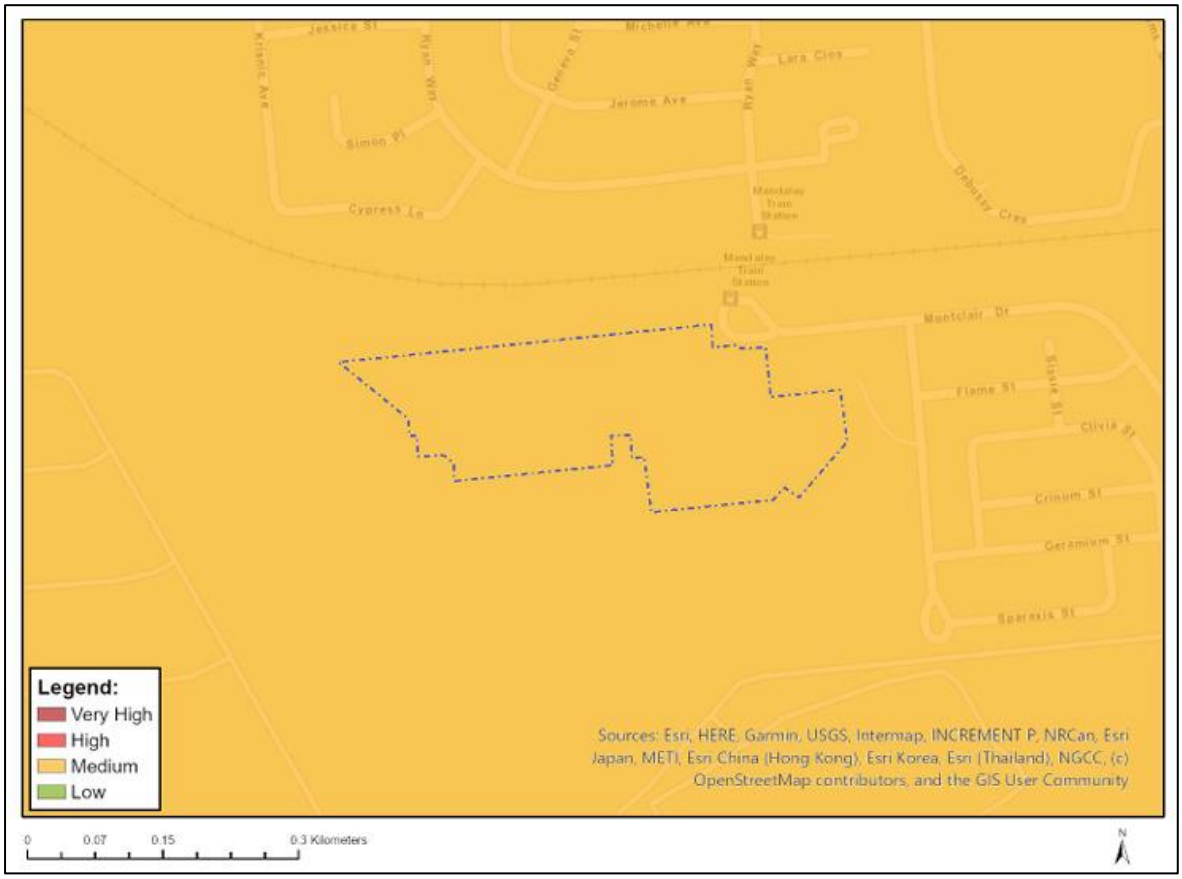


Figure 9: Planetology Sensitivity. Erf 3733 is shown as blue dotted lines.

2.8. Plant Species Theme (Medium Sensitivity)

This theme is identified as 'medium' sensitivity for several plant species (see **Figure 10**). A Botanical Assessment undertaken for Erf 776 in 2008 found the site to be highly disturbed, with vegetation affected by historical earthmoving, fire, invasive alien plants, mowing and grazing. Although 39 indigenous plant species were recorded at the time, these occurred mainly as scattered individuals or fragmented patches, while the site was dominated by alien and disturbance-associated vegetation. A total of 19 invasive alien plant species were recorded, including *Pennisetum clandestinum* (Kikuyu) and *Acacia saligna* (Port Jackson). The vegetation within the development area was subsequently cleared in 2013 in accordance with the 2011 Environmental Authorisation. Since then, invasive alien vegetation, particularly Kikuyu and Port Jackson, has re-established and currently dominates the site. The site does not currently comprise intact indigenous vegetation, with the existing vegetation dominated by invasive alien and disturbance-associated species. Given the highly disturbed condition of the site, its existing development authorisation and the absence of intact or significant natural vegetation, no further botanical specialist assessment is considered necessary.

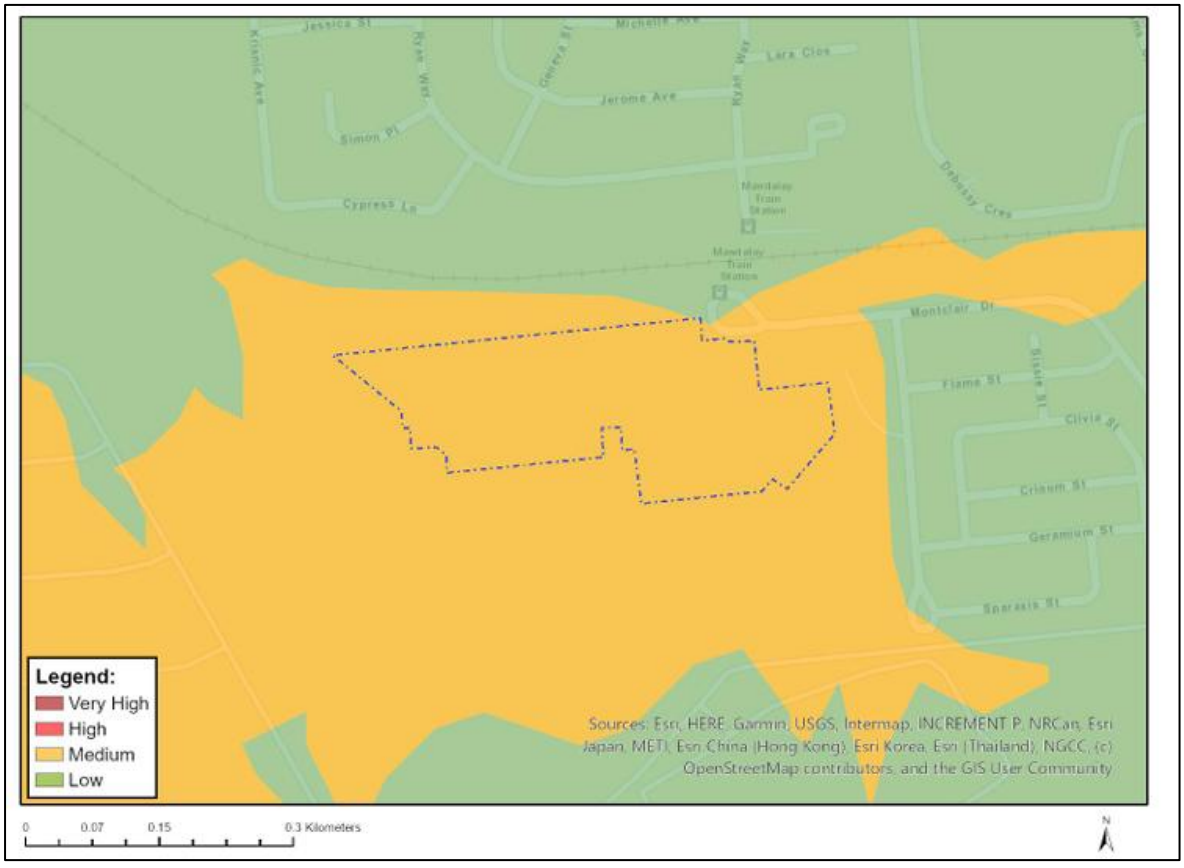


Figure 10: Plant Species Sensitivity. Erf 3733 is shown as blue dotted lines.

2.9. Terrestrial Biodiversity Theme (Very High Sensitivity)

A 'very high' sensitivity is assigned to Erf 3733 Mandalay (see **Figure 11**) due to the historical mapping of Critically Endangered Cape Flats Dune Strandveld. However, the site was already highly disturbed in 2008, as confirmed by the botanical assessment undertaken for the original EIA. The mapped vegetation type is no longer present on site, and the vegetation within the development area was subsequently cleared in 2013 in accordance with the existing 2011 Environmental Authorisation, which authorised the development and associated vegetation clearance. The site is therefore currently highly disturbed and does not comprise the mapped natural vegetation type. Given the site's historical disturbance, existing Environmental Authorisation and current condition, no further terrestrial biodiversity specialist assessment is considered necessary.



Figure 11: Terrestrial Biodiversity Sensitivity. Erf 3733 is shown as blue dotted lines.

3. SPECIALIST STUDIES IDENTIFIED

The following Specialist Studies were identified as part of the Screening Tool Reports:

1. Landscape/Visual Impact Assessment

A Landscape/Visual Impact Assessment is not considered necessary as the site is located within an established urban area and the proposed development is consistent with the existing urban character. The development will comply with the GR2 zoning requirements, with building heights remaining below 15 m. An Architect's letter confirming the proposed development's consistency with the surrounding urban context is included as **Appendix H7**. No significant visual impact is therefore anticipated.

2. Archaeological and Cultural Heritage Impact Assessment

An Archaeological and Cultural Heritage Impact Assessment is not considered necessary. A heritage assessment undertaken for the broader Erf 776 as part of the 2011 EIA did not identify any significant heritage resources within the development area. Erf 3733 formed part of the previously assessed development area, and the proposed development remains within the established urban footprint. Confirmation from HWC is provided in Appendix F5, confirming that no further heritage assessment is required.

3. Palaeontology Impact Assessment

An Archaeological and Cultural Heritage Impact Assessment is not considered necessary. A NID was submitted to HWC as part of the original EIA application for Erf 776 and the final comments from HWC confirmed that no further assessment was required. Erf 3733 formed part of the original Erf 776 and the proposed development remains within the previously assessed urban development footprint. The previous findings are therefore considered applicable, and no further specialist assessment is warranted. It is however recommended that the HWC Fossil Finds Procedure must be implemented and this will be included in the EMPr.

4. Terrestrial Biodiversity Impact Assessment

A Terrestrial Biodiversity Impact Assessment is not considered necessary. The site was already highly disturbed at the time of the 2008 botanical assessment, and the mapped Cape Flats Dune Strandveld is no longer present on site. Vegetation within the development area was cleared in 2013 in accordance with the 2011 Environmental Authorisation. The site is currently dominated by invasive alien and disturbance-associated vegetation and does not comprise intact natural vegetation. No significant terrestrial biodiversity impacts are therefore anticipated.

5. Aquatic Biodiversity Impact Assessment

A specialist (Toni Belcher) undertook an assessment of the site in 2008 (Appendix H2) and also drafted a wetland offset assessment in 2015 (Appendix H3)

FEN Consulting have been appointed to undertake an updated Freshwater Assessment of the site (Appendix H1).

6. Socio-Economic Assessment

A Socio-Economic Assessment is not considered necessary. The proposed development comprises social housing within an established urban area on a site that was previously authorised for high density residential development in terms of a 2011 EA. The principle for residential development on this site has therefore already been established, and the surrounding area has developed in the context of the approved development rights. The current proposal does not introduce a new or incompatible land use. Rather it provides for increased residential density within an already approved residential development. The proposed density is also aligned with the City of Cape Town's current special planning and densification objectives. The proposed development is intended to address a demonstrated need for affordable housing. The development will provide approximately 770 residential units, together with a crèche and neighbourhood retail component, and will support employment opportunities during construction and operation. The socio-economic benefits are therefore considered clear, and no significant adverse socio-economic impacts requiring specialist assessment are anticipated.

7. Plant Species Assessment

A Plant Species Assessment is not considered necessary. The site was already highly disturbed when assessed in 2008 and does not currently comprise intact indigenous vegetation. Vegetation within the development area was cleared in 2013 in accordance with the 2011 Environmental Authorisation, and the site has since been dominated by invasive alien and disturbance-associated vegetation, particularly Kikuyu and Port Jackson. No significant impacts on plant species of conservation concern are therefore anticipated.

8. Animal Species Assessment

An Animal Species Assessment is not considered necessary. The previous EIA for the broader Erf 776 did not identify any animal species of conservation concern within the development area. The site is located within an established urban area and has been substantially disturbed and transformed through previous development activities. No significant impacts on animal species or habitat of conservation concern are therefore anticipated.

Conclusion

No further specialist studies will be required in terms of NEMA.