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BOTANICAL SCREENING FOR NEMA APPLICABILITY: PROPOSED DEVELOPMENT AT PORTION 29 OF FARM 794, STELLENBOSCH, LOCATED IN SOMERSET WEST, CITY OF CAPE TOWN

1. INTRODUCTION

An application is underway for the proposed development of a casino and hotel on Portion 29 of Farm 794, Stellenbosch, located in Somerset West within the City of Cape Town. The site requires a botanical screening assessment to determine the botanical status of the site in accordance with the applicability requirements of the National Environmental Management Act (NEMA) Environmental Impact Assessment (EIA) Regulations.

A screening assessment was previously undertaken in May 2016; however, an update of the site's current status was required. The findings of the 2016 report are summarised below:

> "*A thorough site investigation yielded no red flags in terms of potential development constraints or fatal flaws. The area is highly transformed and supports no intact vegetation or threatened plant species. It is not known, however, whether any threatened bulb species are present, as this can only be determined through a spring survey when bulbs are typically flowering and visible (i.e. not dormant). Even if threatened species were found on site, which is considered unlikely, these could potentially be relocated to a nearby development area such as Sitari Fields, where active wetland restoration is underway. As the appointed botanical specialists, we have no objections to the proposed development of the site. We recommend that further input be obtained from a wetland specialist regarding the ecological value of the wetland ecosystem*."

PHS Consulting has commissioned Capensis Ecological Concluding (Pty) Ltd t/a Capensis to carry out a botanical screening. This screening process will inform the application process in terms of the applicability of the NEMA and is also required to determine the developments impact on the Cape Town Biodiversity Spatial Plan.

The Terms of Reference (ToR) for the botanical study were to undertake the following tasks:
1. Site visit to determine the status quo of the vegetation within the proposed footprint and the remainder of the site.
2. Compile a report with the findings of the site visit and screening study and provide recommendations and an opinion with respect to the proposed activity and acceptability from a botanical perspective.
4. Provide comment with regard to the site's relevance in relation to the City of Cape Town Biodiversity Network.

2. LOCALITY

The area under investigation includes the western portion of the Somerset West Golf Club (Farm Portion 29/274), located between the R102 and the N2 National Highway. The site is situated between the point where these two roads converge on the eastern side and the Audi Centre Somerset West on the western side (Figure 1).

The 22 ha site comprises old golf fairways, bunkers, ponds and drainage channels that are no longer in use or maintained, as well as additional bunkers around the periphery. The site also supports a wetland located in the central portion of the study area.

3. SITE DESCRIPTION, NATIONAL VEGETATION TYPE, ECOSYSTEM THREAT STATUS AND BIODIVERSITY PLANS

National Vegetation type: The soils comprise loamy granitic soils (mainly on the western side) and shale-derived heavy clay soils. According to *The Vegetation Map of South Africa, Lesotho and Swaziland*, the original vegetation types within the site were primarily Lourensford Alluvium Fynbos and, to a lesser extent, Swartland Shale Renosterveld (**Figure 1**). However, the presence of loamy granitic soils suggests that Boland Granite Fynbos may have historically dominated the western portion of the site. This latter

ecosystem is classified as Endangered, whereas the former two are classified as Critically Endangered (**Table 1**).

Table 1. Historical vegetation types likely to have been present within the study area, with ecosystem threat status and remaining area

Vegetation type	Ecosystem threat status[1]	Remaining area
Lourensford Alluvium Fynbos[1]	Critically Endangered	16%
Swartland Shale Renosterveld	Critically Endangered	10%
Boland Granite Fynbos	Endangered	54%

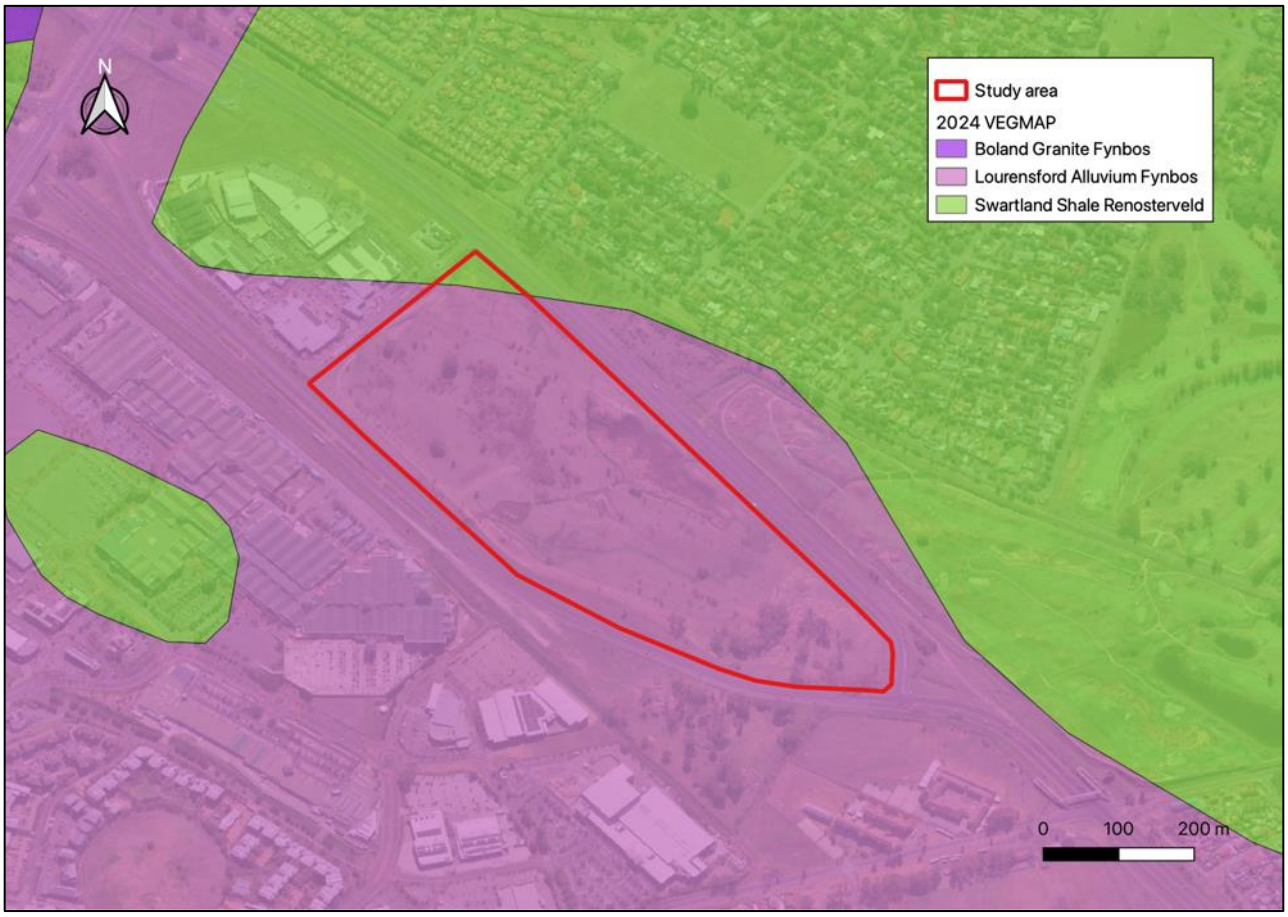


Figure 1. The study area superimposed on a portion of The Vegetation Map of South Africa, Lesotho and Swaziland (SANBI, 2024), overlaid on a Google Earth image.

Conservation Plans: The Cape Town Biodiversity Spatial Plan (CTBSP)(2025) is aligned with the 2024 Terrestrial Biodiversity Network (BIONET). **Table 2** shows how the BIONET categories align with the 2024

[1] The Revised National List of Ecosystems that are Threatened and Need of Protection (RNLETNP)(Government Gazette, 2022).

Western Cape Biodiversity Spatial Plan categories. The Western Cape Biodiversity Spatial Plan (WCBSP)(CapeNature, 2024) is linked to the Western Cape Biodiversity Act 6 of 2021 (WCBA), which "identifies a province-wide network of biodiversity priority areas defined as Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs)" designed to meet conservation objectives. The WCBSP includes a map composed of multiple layers that "provides the relevant spatial data crucial to advise planning decisions that will result in both sustainable development and the conservation of important biodiversity and ecological infrastructure." The management objectives for each map category are provided in **Table 3**. In the case of the study area, it is excluded from the CTBSP (**Figure 2**).

Table 2. The 2025 Cape Town Biodiversity Spatial Plan categories and alignment with the 2024 Terrestrial Biodiversity Network 2024 categories.

BioNet 2024	CBA Descriptors	MSDF (Map 5B)	PSDF	WCBSP 2023	National BPA Map	Land Management Objective
PA	Protected Area	Core 1: Protected & Conserved	Core 1	PA	PA	To be maintained as Protected Areas.
CA	Conservation Area					To be managed and maintained as Conservation Areas or upgraded to Protected Areas where appropriate.
CBA 1	Critical Biodiversity Area 1 (irreplaceable)	Core 1: CBA		CBA 1	CBA	To be managed for biodiversity conservation purposes, restored where required and incorporated into the Protected Area network.
CBA 2	Critical Biodiversity Area 2 (optimal)			CBA 2		To be restored and managed for biodiversity conservation purposes and incorporated into the Protected Area network.
ESA 1	Ecological Support Area 1	Core 2: ESA	Core 2	ESA 1	ESA	To be managed for biodiversity conservation purposes, restored where required.
ESA 2	Ecological Support Area 2	Buffer 2	Buffer 2	ESA 2		Current land-use should be maintained, or else restored to a more natural state.
ONA	Other Natural Area	Buffer 1	Buffer 1	ONA	ONA	As per the CCT District EMF.
NNR	No natural habitat remaining			NNR		As per the CCT District EMF.

Table 3. Summary of 2023 WCBSP map categories and their meanings

Map Category	Definition	Desired Management Objective	Sub-Category
Protected Area	Areas proclaimed as protected areas in terms of national or provincial legislation.	Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. A biodiversity benchmark.	
Critical Biodiversity Area 1	Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.	Maintain in a natural or near- natural state, with no further loss of habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity- sensitive land-uses are appropriate.	River Estuary Wetland Forest Terrestrial
Critical Biodiversity Area 2	Areas in a degraded or secondary condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.	Maintain in a functional, natural, or near-natural state, with no further loss of natural habitat. These areas should be rehabilitated.	Degraded
Ecological Support Area 1	Areas that are not essential for meeting biodiversity targets but play an important role in supporting the functioning of PAs or CBAs and are often vital for delivering ecosystem services.	Maintain in a functional, near- natural state. Some habitat loss is acceptable, provided the underlying biodiversity objectives and ecological functioning are not compromised. Maintaining and improving protection of areas identified as ESA Water Source and Water Recharge important to secure water resources, particularly in Strategic Water Source Areas (SWSAs).	Foredune Forest Climate Adaptation Corridor Coastal Resource Protection Endangered Ecosystem River Estuary Wetland Watercourse Protection Water Source Protection Water Recharge Protection
Ecological Support Area 2	Areas not essential for meeting biodiversity targets but have an important role in supporting the functioning of PAs or CBAs. Often vital for delivering ecosystem services.	Restore and/or manage to minimise impact on ecological infrastructure functioning; especially soil and water-related service.	Restore from Non-Natural
Ecological Support Area: Species Specific Overlay	Terrestrial No Natural Remaining areas that provide a critical support function to a threatened or protected species e.g. cultivated land associated with nesting/roosting sites.	Maintain current land-use or rehabilitate to functional natural area.	Species Specific
Other Natural Areas: Natural to Near-Natural	Areas that have not been identified as a priority in the systematic biodiversity plan but retain most of their natural character and perform a range of biodiversity and ecological infrastructure functions. They are still an important part of the natural ecosystem.	Minimise habitat and species loss and ensure ecosystem functionality through strategic landscape planning. Offers flexibility in permissible land-uses, but authorisation required for high-impact land-uses.	Natural to Near-Natural Degraded
No Natural Remaining	Areas that have been modified by human activity to the extent that they are no longer natural nor contribute to biodiversity targets. These areas may still provide limited biodiversity and ecological infrastructure functions, even if not currently prioritised for conservation action.	Manage in a biodiversity- sensitive manner, aiming to maximise ecological functionality. Offers the most flexibility regarding potential land-uses, but authorization/s may still be required for high-impact land-uses.	No Natural Remaining



Figure 2. CONSERVATION PLANNING MAP: The study area in relation the Cape Town Biodiversity Spatial Plan (Terrestrial Biodiversity Network 2024 shapefile version) overlaid on a Google Earth aerial image.

4. BOTANICAL STATUS QUO

During the 2026 survey (carried out on 19 May), it was evident that the site was no longer in use as a golf course. This is also apparent from the aerial imagery shown in **Figure 3**. The most notable change from a botanical perspective is the increase in invasive Port Jackson willow (*Acacia saligna*). The site also now supports a herd of cattle and is heavily grazed (**Figure 4**). In addition, the wet areas appear to have become more extensive due to the lack of maintenance of the former fairways, with a greater abundance of wetland-associated species evident along the drainage pathways. A separate freshwater study was undertaken by Jeanne Snyman.

The 2026 survey did not yield any significant findings regarding the extent of indigenous vegetation. The site remains in a Highly Degraded to Transformed state (**Figures 5** and **6**) and is dominated by ruderal weeds and grasses, mainly kikuyu grass (*Cenchrus clandestinus*) and kweek (*Cynodon dactylon*).

The few bulb species identified within the terrestrial and wetland areas are also considered secondary elements. These include: (1) patches of *Pauridia aquatica* and *Eleocharis limosa* (non-geophtic)within some of the old ponds (**Figure 7**), and (2) patches of *Ornithogalum thyrsoides* (**Figure 8**), *Oxalis flava*, *O. purpurea*, and *Moraea flaccida*. The weedy bulb *Romulea rosea*, commonly associated with sports fields and transformed areas, was found to be almost ubiquitous. The indigenous pioneer shrub species *Stoebe plumosum* (slangbos) has also established along the fence line immediately north of the main wetland body (**Figure 9**).

The wet areas are dominated by dense stands of Cape bulrush (*Typha capensis*), with additional indigenous species occurring along the wetland margins, including *Cenchrus caudatus*, *Juncus capensis*, and *Salicornia* sp. (**Figure 10**). A patch of papyrus (*Cyperus papyrus*; exotic) occurs in one of the ponds alongside several weeping willow trees (*Salix babylonica*; exotic) (**Figure 11**).



Figure 3. LOCALITY MAP AND TIME LAPSE: The study area (red outline) showing the site in 2016 compared to 2026 overlaid on a Google Earth™ aerial image. The most evident change is the spread of invasive Port Jackson willow just north of the central wetland.



Figure 4. Since the 2016 survey cattle have been introduced. The site is thus intensively grazed. Note the dominance of kikuyu grass and ruderal weeds and the invasive trees Port Jackson (foreground) and sugar gum (background).



Figure 5. The study area viewed from the western end of the site looking east showing highly degraded to transformed habitat.



Figure 6. The site viewed from the eastern end looking west showing highly to degraded to transformed habitat.



Figure 7. Old pond at waypoint 045 (34° 4'49.25"S; 18°49'32.39"E) with *Paurida aquatica.*



Figure 8. A patch of chincherinchee *Ornithogalum thrysoides* located at waypoint 052 (34° 4'46.55"S; 18°49'42.49"E).



Figure 9. The indigenous pioneer *Seriphium plumosum* (slanbgbos) establishing along the northern boundary next to the main wetland body.



Figure 10. The main wetland body showing highly degraded to transformed wetland with Cape bulrush and kikuyu on the edge.



Figure 12. A patch of exotic papyrus and weeping willow tree in a wetland pond at waypoint 064 (34° 4'55.69"S; 18°49'41.31"E).

5. CONCLUSIONS AND RECOMMEDATIONS

The 2026 botanical screening assessment of Portion 29 of Farm 794 (Somerset West Golf Club), Stellenbosch, confirms that the site is highly transformed and degraded. The majority of the approximately 22 ha study area consists of old golf fairways, ponds, and drainage lines that are no longer maintained, and the site is currently heavily grazed by cattle. The vegetation is dominated by ruderal weeds, kikuyu grass (*Cenchrus*

clandestinus), and kweek (*Cynodon dactylon*), with a significant infestation of invasive alien plants, particularly Port Jackson willow (*Acacia saligna*).

Although scattered indigenous species are present, these are limited to common, disturbance-tolerant elements typical of highly modified landscapes. These include:

- Bulbs such as *Pauridia aquatica*, *Ornithogalum thyrsoides*, *Oxalis flava*, *Oxalis purpurea*, and *Moraea flaccida*.
- Wetland-associated species such as *Typha capensis*, *Cenchrus caudatus*, and *Juncus capensis*.

No intact or semi-intact or even degraded examples of the historical vegetation types (Lourensford Alluvium Fynbos – Critically Endangered, Swartland Shale Renosterveld – Critically Endangered, or Boland Granite Fynbos – Endangered) remain on site. The site does not support any threatened plant species of conservation concern and falls outside the Cape Town Biodiversity Spatial Plan / Terrestrial Biodiversity Network (2024/2025).

Recommendations

1. **Relocation of Indigenous Bulbs:** Prior to construction, the remaining populations of indigenous bulb species (particularly *Pauridia aquatica*, *Ornithogalum thyrsoides*, and *Oxalis* species) should be carefully rescued and relocated to suitable receptor sites, such as the nearby Sitari Fields wetland restoration area or other appropriate conservation or rehabilitation sites. This should be undertaken under the supervision of a qualified botanist during the appropriate season.
2. **Alien Invasive Plant Management:** A thorough alien invasive species clearing programme must be implemented as part of the development. Priority should be given to Category 1b species such as *Acacia saligna*. Ongoing monitoring and control will be required to prevent re-infestation.
3. **Integration with Other Specialists:** The findings of this botanical screening should be read in conjunction with the freshwater/wetland specialist report.

As the appointed botanical specialist, I have no objections to the proposed casino and hotel development proceeding on this site from a botanical perspective. The development will not result in any significant loss of indigenous vegetation or impact on Species of Conservation Concern.

Paul Emms Pr. Sci. Nat.



Botanical Specialist
SACNASP Registration No.: 400352/14

THE SPECIALIST

I, Paul Ivor Emms, 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/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
- in terms of the remainder of the general requirements for a specialist, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- have disclosed/will disclose, to the applicant all material information that have 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;
- have ensured/will ensure that information containing all relevant facts in respect of the application was/will be distributed or was/will be made available to interested and affected parties and the public and that participation by interested and affected parties was/will be facilitated in such a manner that all interested and affected parties were/will be provided with a reasonable opportunity to participate and to provide comments;
- am aware that a false declaration is an offence in terms of regulation 48 of the 2014 NEMA EIA Regulations.

Note: The terms of reference of the review specialist must be attached.

Signature of the specialist: 

Date:22 May 2026