

PROPOSED MIXED USE DEVELOPMENT OF CAPE FARM 1529 (“IMHOFF FARM”), KOMMETJIE, SOUTH PENINSULA, CITY OF CAPE TOWN

FULL SCOPING AND EIA PROCESS

PRE-APPLICATION SCOPING REPORT EXECUTIVE SUMMARY

1 INTRODUCTION

The owner of Cape Farm No. 1529 Kommetjie, City of Cape Town proposes a mixed-use development on the greater extent of the site (see Figure 1 at end of document). The proposed development triggers activities listed in the National Environmental Management Act (NEMA) Environmental Impact Assessment (EIA) Regulations (2014, as amended) including an activity listed in GN No. R984 (Activity 15). As such the proposed development requires prior environmental authorisation and a Full Scoping and EIA process must be undertaken. Also, an independent Environmental Assessment Practitioner (EAP) must undertake the process on behalf of the applicant. KHULA Environmental Consultants (KHULA) has been appointed by the applicant as the EAP responsible for the EIA.

2 FULL SCOPING AND EIA PROCESS

The Full Scoping and EIA process is currently at the Scoping Phase. The overall aim of the Scoping Phase is to determine those environmental issues and impacts associated with the proposed development that require further investigation and determine the level of investigation required. This scope of works or terms of reference for the EIA is presented in the Plan of Study for Scoping (see Section 9).

3 DESCRIPTION OF AFFECTED ENVIRONMENT

3.1 Site Description

The proposed site comprises the remaining extent of Cape Farm 1529, known as “Imhoff Farm” situated in Kommetjie, South Peninsula, City of Cape Town. The proposed site is approximately 58,63 ha in extent and mostly comprises natural veld with varying levels of alien plant infestation. The only structures on the farm are a few remnant concrete slabs from demolished buildings. The open veld is used for low intensity grazing by goats, horses, camels and alpacas which are currently kept on the farm. The site is crisscrossed with a number of dirt tracks which are used by the farm’s workers to access the various parts of the farm for maintenance purposes including alien clearing.

3.2 Surrounding Land Use

Two schools, the Imhoff Waldorf School and Imhoff Generation Schools, currently operate on separately-owned land within the proposed site. These two currently linked portions of land are accessed via a recently constructed road from the south off Kommetjie Road. To the north and south west of the site lies Table Mountain National Park (the Noordhoek Wetlands lie to the north west and Slangkop Mountain lies to the south west). There are also

three residential areas adjacent to the farm including Ocean View, Blue Water Estate and Kommetjie. Ocean View is a historically disadvantaged suburb which is located immediately south of the site immediately south of Kommetjie Road. Blue Water Estate (an affluent residential security estate) is located immediately east of the farm and immediately west of the farm lies the middle to upper income coastal town of Kommetjie.

3.3 Biophysical Environment

A key aspect of the biophysical environment is the site’s terrestrial biodiversity. The SA vegetation map (Mucina & Rutherford 2012; shows that two primary vegetation types, Peninsula Sandstone Fynbos (Critically Endangered) and Hangklip Sand Fynbos (Endangered) occur on the property. Although much of the vegetation has been partly degraded and disturbed both these types are still recognisably present on site. There are also thicket elements on site, and these are most typical of Cape Flats Dune Strandveld rather than either of the two mapped vegetation types previously referred to. This vegetation type regarded as Endangered on a national basis (DEA 2011).

The site provides habitat for a range of terrestrial fauna. Also, its proximity to Table Mountain National Park (TMNP) and its function as the only undeveloped link between the northern and southern parts of TMNP indicate that the site is important from a terrestrial biodiversity perspective. The parts of the site where development is currently proposed are generally within fairly impacted areas which, although currently used by fauna to move through the site, are not considered optimal or important habitat for many species.

Two drainage lines occur within the proposed site, one transects the south-western corner of the proposed site and is known as the Bokramspruit stream and the other (referred to as the “eastern watercourse”) crosses the portion of the site known as the “paddocks” before discharging into the Wildevoëlwei. The Wildevoëlwei which is a significant aquatic feature lies adjacent to the site and receives both diffuse run-off from the site and flows from the eastern watercourse and is therefore hydrologically linked to the proposed site. No development is proposed near the Bokramspruit stream and therefore the only watercourses at risk are the eastern watercourse and the Wildevoëlwei. The buffer zone assessment method (Macfarlane and Bredin, 2016) was applied to the eastern wetland and the Wildevoëlwei, independently. A buffer width of 15m was calculated in order to protect the eastern wetland from construction as well as operational phase activities and a buffer width of 30m was calculated along the periphery of the Wildevoëlwei. The buffers were used to inform both layout alternatives and both buffers have been designated as open space.

3.4 Socio-economic Environment

The proposed site falls within the ‘Far South’ (south of Muizenberg and Chapman’s Peak) sub-district of the Southern District of the City

of Cape Town which has a population of about 70 000 (Southern District Plan, 2012). Key socio-economic issues facing the Southern District and particularly the Far South include:

- The district has the lowest Socio-Economic Status (SES) Index in the city (22.16% - district average across the city is 37.97%). This is a general measurement based on average per capita qualifications, unemployment, occupation skills, and household income.
- The district enjoys the highest average employment rate (86.57%) and lowest unemployment rate (13.43%).
- However, it is a district characterised by predominantly higher income development, both residentially and commercially. Generally high property prices also make access to land, and economic opportunities, for lower income groups increasingly difficult.
- Economic activity is concentrated primarily in commercial nodes / centres along the Main Road corridor from Mowbray to Muizenberg and a few outlying commercial centres are located at Constantia, Kenilworth (KC and Access Park), Westlake, Hout Bay, Fish Hoek and Long Beach in Sun Valley. Although less accessible, those east of the mountains are supported to a degree by the Main Road corridor and intersecting east-west route system. However, those in the 'far south' (Fish Hoek through to Kommetjie) are relatively inaccessible. This, combined with limited growth opportunities, constrains development of further economic opportunity in these areas.
- The relative lack of large cheap land areas, as well as environmental issues, has resulted in relatively little industrial development (only 5.4% of all industrial activity in the City).
- Tourism and recreation activities are significant economic generators in the district.
- Constrained/restricted road access to Hout Bay and the 'Far South' has implications in terms of growth (increasing congestion on key routes) and key services (e.g. emergency services).

3.5 Heritage

The heritage resources associated with Imhoff Farm of greatest significance *viz a viz*, the historic werf, are all located within the adjacent commercial site (Erf 5457 Kommetjie). Given the proximity to the commercial site, the proposed development must take into consideration the preservation of these heritage resources. As such the manner in which the proposed development interfaces with the commercial site is of utmost importance from a heritage perspective.

Slangkop Road and Soetwater Road are identified as Scenic Drives in the Southern District Plan (2012). As such the southern approach to Imhoff Farm from Slangkop Road can be regarded as being of scenic value. The eastbound and westbound approaches to the site from Kommetjie Road have no scenic value, although the broader landscape and long views are considered to be of scenic value.

The site also abuts TMNP, a Grade 1 heritage site as well as part of a natural World Heritage Site – a serial designation relating to the Cape Floristic Kingdom Biome. Significance in this regard is ascribed in terms of its natural rather than cultural or cultural landscape values. The buffer zones, of which the application site forms a part of, are intended to protect the core conservation areas from anthropogenic influences (e.g. prevent the spread of alien vegetation into the TMNP).

4 NEED & DESIRABILITY

4.1 Spatial Planning Policy

The applicable spatial planning policy indicates the need for densification and the provision of housing in areas that are accessible and that have adequate services. The policy also calls for the protection of cultural and heritage resources, biodiversity and natural resources such as wetlands and the coast, particularly insofar as the goods and services that these features deliver and their potential tourism value given the importance of tourism in the local and regional economy.

4.2 Protection of sensitive environmental features

The proposed development aims to achieve a balance between the often opposing priorities of housing provision and the protection of the environment by including an appropriate housing type (retirement), siting the housing on land of a lower ecological sensitivity and sufficiently set-back from freshwater resources and locating buildings in the landscape in such a way that their visual impact is minimised. The site's areas of high ecological sensitivity will be set aside and secured as a conservation area that is specifically orientated to maintain ecological connectivity between the adjacent northern and southern parts of TMNP.

4.3 Timing of the proposed development

The timing can be considered appropriate given that a major upgrade to the local road network will have been completed before the development commences. The housing typology and particularly the high component of retirement housing responds appropriately to the current market trends.

4.4 Employment and local economic development opportunities

Given that two of the nearby residential areas, Ocean View and Masiphumelele, experience high levels of poverty and very high levels of unemployment, the employment creation opportunities generated by the proposed development (including temporary employment in the construction industry and permanent employment in the domestic worker, maintenance and retail sectors) are potentially highly significant.

5 MOTIVATION FOR AND DESCRIPTION OF ACTIVITY

5.1 Motivation

The development proposal recognises the residential value of the property within its broader context in the deep south which has significant scenic beauty and good transport infrastructure that is being significantly upgraded to meet development demands. Supplementary land uses, such as a retail component and a school, compliment the residential elements, ensuring these facilities are sustainably and locally accessible for future residents and tenants of the proposed development, as well as to surrounding communities. The development encompasses a range of residential typologies catering for various markets. These include a retirement development (comprising stand-alone and apartment type dwellings),

apartments, and single residential opportunities. The development of the site, being located between Kommetjie, Ocean View and Blue Water Estate/Imhoff's Gift, presents much needed socio-economic opportunities (primarily employment and business opportunities) for nearby communities, especially those in need of economic stimulation.

The proposed development also recognises the importance of the area from a biodiversity conservation perspective, particularly the importance of the site as providing the only ecological link between parts of Table Mountain National Park (TMNP) to the north and south of the site. Accordingly, the proposed development sets aside a significant tract of land (>20 ha) of high conservation value to maintain ecological connectivity. Recognising the importance of biodiversity as an informant in developing the conceptual layout of the scheme, biodiversity specialists were consulted and have, in principle, endorsed the development concept.

5.2 Description of the Proposed Activity

5.2.1 Proposed mixed-use development

The proposed development comprises three main components (see Figure 1 at end of this document) which are summarised as follows:

- Retirement village:
 - 165 single unit retirement (± 5 ha)
 - 74 retirement apartments ($\pm 1,42$ ha)
 - Private open space ($\pm 0,07$ ha)
 - Private road ($\pm 2,11$ ha)
- Mixed use remainder:
 - 88 single residential erven ($\pm 5,32$ ha)
 - School ($\pm 4,88$ ha) for approximately 1 200 learners
 - 74 residential apartments ($\pm 1,38$ ha)
 - General business zone / shopping centre ($\pm 2,84$ ha)
 - Private open space ($\pm 10,46$ ha)
 - Private roads ($\pm 2,39$ ha)
 - Public roads ($\pm 1,17$ ha)

Environmental conservation area ($\pm 21,59$ ha)

5.2.2 Access, road network upgrades and parking

The site currently has one access point off Kommetjie Main Road at the Slangkop intersection which will be the primary access to the proposed development. Each component of the development will have its own access off an internal public road with the residential accesses being access controlled. A new left-in, left-out (LILO) access is proposed off Kommetjie Main Road for the proposed shopping centre.

In order to accommodate the traffic that will be generated by the proposed development it is envisaged that capacity improvements will be required at the Kommetjie Road / Slangkop Road intersection with the added likely requirement for the installation of traffic signals at this intersection.

A total of 1 167 off-street parking bays, including disabled bays, are required in terms of the Municipal Planning By-Law (MPBL, 2019) requirements for a Standard Area. A minimum of six loading bays are required for the proposed shopping centre.

5.2.3 Engineering Services

The required capacity exists in the municipal bulk sewerage (including the Wildevoelivlei Wastewater Treatment Works) and potable water supply infrastructure with only connections being required to the existing bulk services within or adjacent to the proposed site.

A detailed Local Storm Water Master Plan (LSWMP) will be compiled and submitted to the City's Catchment, Storm Water and River Management Branch as part of the approval process. The LSWMP will guide the detail design of the stormwater management system that will serve the development. The Plan will comply with the applicable policy of the Local Authority and will also incorporate the recommendations of the freshwater specialist regarding protection of the receiving watercourses.

6 ALTERNATIVES

In terms of the NEMA EIA Regulations (2014, as amended) the applicant is required to demonstrate that reasonable alternatives have been described and investigated in sufficient detail.

6.1 "No-Go" alternative

As it is a standard practise in EIAs to assess the "No-Go" alternative the "No-Go" alternative will be assessed. The "No-Go" alternative assumes that no development will take place on the site and that the current agricultural activities will continue. In this regard it must be noted that active agriculture is limited to the grazing of livestock. This means that the application site will remain largely agriculturally inactive with little chance of any additional viable agricultural activities taking place in the future due to limited agricultural potential and prohibitively high start-up costs.

6.2 Layout alternative

The layout alternative being considered in the EIA process is similar with regards to the land uses and their general location on the site as the preferred alternative described in the previous section but has the key difference of locating additional retirement units in an area of medium botanical sensitivity immediately west of the existing Imhoff Waldorf School. This is in line with the botanical baseline report which stated that "medium sensitivity areas could be developed provided that a minimum of 30% open space be retained for ecological connectivity in these areas".

6.4 Alternatives to be assessed in the EIA

The following three alternatives will be assessed in equal detail in the EIA process:

- The applicant's preferred alternative (mixed use development spanning an area of approximately 37 ha);
- A layout alternative (which also entails mixed use development but spanning an area of approximately 39 ha owing to an additional area of retirement units to the west of the existing Imhoff Waldorf School); and
- The "No-Go" or "No Development" alternative.

Should the EIA process identify any potentially significant negative impacts associated with the proposed development then it may be necessary to introduce other alternatives to minimize the impacts (e.g. technology alternatives etc). At this point in the EIA process no such impacts have been identified.

7 PUBLIC PARTICIPATION PROCESS

A Public Participation Process which is compliant with the requirements of the NEMA EIA Regulations (2014, as amended) will be undertaken. This will entail the placement of the relevant advertisements in the local and regional media, on-site notices and registered letters to the immediately abutting neighbours and direct notification of relevant public interest groups. In addition, full hard copies of the Scoping Report will be issued to the following statutory bodies:

- Department of Water & Sanitation (DWS);
- South African National Parks (SANParks);
- Provincial Department of Agriculture (DA);
- Provincial Department of Transport and Public Works (DTPW);
- CapeNature;
- Heritage Western Cape (HWC); and
- City of Cape Town.

Written requests for registration on the project database and/or written comment must reach KHULA Environmental Consultants on or before **17 August 2020**. All comment will be recorded in a Comments & Responses Report which will be circulated along with the application stage Draft Scoping Report to the registered Interested and Affected Parties (IAPs) will have a final opportunity to review the documentation before the Final Scoping Report is submitted to DEA&DP for a decision whether or not to approve the Scoping Report (and the Plan of Study for Scoping).

If approved the process will move forward to the EIA phase when here will be further opportunities for the registered IAPs to engage the process.

8 POTENTIAL ENVIRONMENTAL IMPACTS

At the outset the following potentially significant impacts have been identified:

8.1 Construction phase Impacts

- Botanical impacts;
- Fauna impacts
- Freshwater ecological impacts;
- Socio-economic benefits (employment and expenditure);
- Visual impacts (unsightly construction site); and
- Nuisance impacts (including noise and dust).

8.2 Operational phase Impacts

- Botanical impacts;
- Fauna impacts;
- Freshwater ecological impacts;

- Socio-economic benefits (permanent employment and contribution to the local economy);
- Visual impacts (reduced scenic quality of landscape)
- Traffic impacts (increased congestion on local road network).

8.3 Closure and Decommissioning phase Impacts

While closure and decommissioning is an unlikely event for the proposed development, the potential closure and decommissioning impacts are as follows:

- Botanical impacts;
- Fauna impacts
- Freshwater ecological impacts;
- Socio-economic benefits (employment and expenditure);
- Visual impacts (unsightly construction site); and
- Nuisance impacts (including noise and dust).

8.4 Specialist Studies

New primary research is required in respect of the potential impacts on terrestrial flora, fauna, freshwater ecosystems and as such specialist botanical, fauna and freshwater studies will be commissioned as part of the EIA process. In accordance with the requirements of HWC a Heritage Impact Assessment, informed by a specialist Visual Impact Assessment (VIA) will be undertaken. An assessment of the socio-economic impacts and benefits will be undertaken by a socio-economic specialist and a Transport Impact Assessment (TIA) will be undertaken in accordance with the Department of Transport (DoT) and Local Authority requirements. The remaining impacts (e.g. nuisance impacts) identified at this preliminary stage of the EIA will be assessed by the EAP.

The specialist studies that will be undertaken aligns with the findings of the DEA Screening Tool.

9 PLAN OF STUDY FOR EIA

9.1 Description of EIA phase

The proposed process for the EIA phase will take place in two stages as several specialist studies will be undertaken. The activities that will be undertaken in the EIA phase are as follows:

- Identification and assessment of environmental impacts by specialists. This will entail an assessment of various impact assessment criteria including the duration, extent, probability and intensity of the impacts to assess their significance;
- Identification of mitigation measures and recommendations for environmental management of the proposed project;
- Collation and drafting of the above information into an Environmental Impact Assessment (EIA) Report;
- Compilation of an Environmental Management Programme (EMPr) based on the recommended environmental management and mitigation measures;
- Circulation of the Draft EIA Report (incorporating the EMPr) for a 30 day comment period among registered IAPs only;
- Compilation of an EIA phase Comments & Responses Report;

- Preparation and submission of a Final EIA Report (incorporating Comments & Responses Report) to DEA&DP for a decision¹; and
- Notification issued to Registered IAPs of Environmental Authorisation (EA) and appeal process.

9.2 Assessment of Impacts

The significance of the project's impacts will be assessed and rated using detailed impact assessment methodology. Simply stated the **significance** of an impact is defined as a combination of the **consequence** of the impact occurring and the **probability** that the impact will occur. A detailed set of criteria will be applied to determine the consequence ratings of potential impacts. Impact significance will be rated both before and after mitigation so as to demonstrate the efficacy of the proposed mitigation measures in minimising the potential impact.

9.3 Comparison of Alternatives

Where warranted, each alternative will be assessed in a similar level of detail using the prescribed impact assessment methodology. Thereafter a comparison of the environmental acceptability (i.e. whether the impacts are acceptable or not) of the various alternatives will be undertaken with the environmentally preferred alternative being indicated. This will include a brief synopsis motivating the choice of the environmentally preferred alternative. A comparison between the "No-Go" alternative and the assessed development alternatives will form part of this analysis.

9.4 Public Participation and Review

The activities and provisional timetable for the EIA phase and its public participation component are summarised in the table below. The EIA Phase of the project will take approximately 3 months to complete.

Task	Start	Finish
EIA PHASE	January 2021	March 2021
Prepare Draft EIA Report	December 2020	January 2021
Release Draft EIA Report to public	Mid January 2021	
Public Comment Period	Mid January 2021	End February 2021
Submission of Final EIA Report	Early March 2021	
Record of Decision by DEA&DP	End June 2021	

10 KEY FINDINGS & WAY FORWARD

10.1 Key Findings

The key findings of the Scoping Study are as follows:

- The applicant proposes to develop the remainder of Imhoff Farm as a mixed-use development, comprising retirement, residential,

¹ If as a result of the public participation process the documentation released for public review has to be substantially revised then additional public participation activities may be required.

retail and educational land uses with a development footprint in excess of 20 ha;

- The motivation for the proposed development is to realise the site's value as prime residential property given its scenic quality, views and rural character in close proximity to well-developed transportation infrastructure.
- The proposed development is largely in accordance with the applicable spatial planning policy and where alignment is unclear it can be motivated on reasonable grounds;
- The proposed development site is undeveloped and contains indigenous vegetation including Critically Endangered and Endangered fynbos. It lies adjacent to TMNP and comprises an essential undeveloped ecological link between the northern and southern parts of TMNP. As such development of the site is likely to generate significant terrestrial biodiversity impacts and accordingly a botanical and a freshwater specialist study will be commissioned;
- The site contains some wetland habitat and the Bokramspruit stream. While the development is being suitably set-back from these on-site freshwater ecosystems, the requirement to construct a boundary fence necessitates construction activities within a portion of wetland habitat. The application site is also located near important wetlands and as such a freshwater specialist study will be commissioned to identify and assess any potential freshwater ecological impacts;
- Significant socio-economic benefits are anticipated, primarily associated with increased employment opportunities both temporary and permanent. The significance of the projects potentially significant socio-economic impacts and benefits will be detailed in the EIA phase;
- The site lies adjacent to the historical werf of Imhoff Farm and scenic routes and as such potentially significant impacts on cultural and historical heritage resources are likely;
- The Public Participation Process (PPP) will be fully compliant with Regulation 54 of NEMA as such the process will give all Interested and Affected Parties (IAPs) with an opportunity to engage with the process and assist with the identification of issues and concerns that need to be addressed.
- The following alternatives will be investigated in the EIA phase:
 - The applicant's preferred alternative (proposed construction of the new development at the preferred site);
 - A site alternative which entails the construction of a development of similar capacity in the adjacent watercourse to the south west of the preferred site; and
 - The "No-Go" or "do nothing" option.
- The Scoping study has identified the following potentially significant impacts that need to be addressed in the EIA:
 - Terrestrial ecological impacts;
 - Freshwater ecological impacts;
 - Socio-economic benefits;
 - Visual impacts and associated heritage impacts; and
 - Traffic impacts.
- To address these impacts the following specialist studies will be undertaken:
 - Botanical specialist study;
 - Fauna specialist study;
 - Visual Impact Assessment (the findings of which will inform the Phase 1 Heritage Impact Assessment);
 - Transport Impact Assessment; and
 - Socio-economic Impact Assessment.

10.2 Way Forward

This Executive Summary of the pre-application Scoping Report has been sent to all the potential IAPs. The Executive Summary notifies registered IAPs of the availability of the Scoping Report on KHULA's Website URL www.khulaec.co.za/projects/ and informs IAPs of the opportunity to register on the project database and to submit comments. Should IAPs either register and/or submit comment within the combined registration and comment period then they will be registered on the database and will be engaged further in the EIA process. Failure to register and/or submit comment by 17 August 2020 could result in the IAP being excluded from any further involvement.

Written requests for registration and/or comment must be submitted on or before 17 August 2020 to:

Mr Nick Steytler
 KHULA Environmental Consultants Fax 086-694 6901
 PO Box 22761 email: nick@khulaec.co.za
 Scarborough, 7974

Following the closure of the comment period (30 days) the comments received from IAPs will be addressed and an application stage Draft Scoping Report compiled. The application stage Draft Scoping Report (including the Comments & Responses Report) will be released for comment among the registered IAPs. Any new issues raised by the registered IAPs will be responded to following which the Scoping Report will be finalised and submitted to DEA&DP for a decision regarding whether or not to approve the Final Scoping Report. Should DEA&DP approve the Final Scoping Report then the EIA process will move into the second phase, the Impact Assessment phase, in accordance with the Plan of Study for EIA as contained in the Final Scoping Report.

Upon request, electronic copies of the documentation can be emailed to IAPs (free of charge) and hard copies of the Scoping Report can also be mailed at a cost of R500 (incl VAT). Note costs are merely to cover the time and expenses associated with producing additional copies.

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Figure 1: Layout of the proposed development