

DOAG III

**HERITAGE WESTERN CAPE**  
**Provincial Heritage Resources Authority of the Western Cape**

Department of Cultural Affairs and Sport  
Branch: Cultural Affairs  
Private Bag X9067  
Cape Town  
8000

10 July 2003

Doug Jeffery Environmental Consultants  
P O Box 44  
Klapmuts  
7625

FAX 021 875 5272  
Our Ref C13/3/7/5

Dear Mr Jeffery

**RE: ARCHAEOLOGICAL IMPACT ASSESSMENT OF PROPOSED TOWNSHIP  
DEVELOPMENT ON ERF 1288, FARMS 438/1 & 438/4, KULSRIVER**

The letter from the Agency for Cultural Resource Management to you dated 30  
September 2002 refers.

The archaeological impact assessment for the above development was reviewed by  
the Archaeology, Palaeontology and Meteorites Committee of the Council of the  
provincial heritage resources authority, Heritage Western Cape.

No significant archaeological sites were noted during the survey.

Heritage Western Cape has no objections to the development proceeding, provided  
that Heritage Western Cape will be informed if any archaeological or palaeontological  
remains are found in the course of the development. The discovery of any graves or  
human remains must be reported immediately to the South African Heritage  
Resources Agency and work must cease until the site has been investigated. Any  
mitigatory work required will be at the cost of the developer.

Yours sincerely

Chris Snelling  
Manager: Heritage Resources Management  
pp. Heritage Western Cape

**FILE**



**DOUG JEFFERY**

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12<sup>th</sup> May 2003

Terraplan Associates  
Martin Klopper  
19 King Street  
Durbanville

Dear Martin

**PROPOSAL FOR THE DEVELOPMENT OF HIGHBURY ESTATE ON FARM 1286,  
KULSRIVER – APPLICABILITY OF ENVIRONMENTAL CONSERVATION ACT**

Your request for clarity on the applicability of the regulations under the Environment Conservation Act to the proposed development of Farm 1286, Kulsriver refers.

The regulations state that a “change in land *use* from agricultural or zoned undetermined use or an equivalent zoning to any other land use” is an activity which may have a substantial detrimental effect on the environment.

Farm 1286 is **zoned** agricultural but the present land *use* is not agriculture. The land is not zoned undetermined or an equivalent zoning. It is my opinion, based on discussions with the Department of Environment Affairs and Development Planning, therefore that the regulations do not apply to the development of housing on the erf.

In order to comply with the Sections 24 (1) and (7) of the National Environmental Management Act (Act 107, 1998) the local authority must however satisfy themselves that there are unlikely to be any significant environmental impacts that will result from the proposed development. To this end and to assist the local authority, attached are a botanical and archaeological assessment (Appendices 1 and 2) of the proposed development area which indicate that there are unlikely to be significant impacts on floral or heritage attributes of the site resulting from the proposed housing development.

Director: D. J. Jeffery

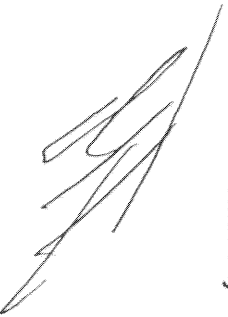
Reg. No. 99/09151/07

Reference is made in the botanical report to a wetland to the east of the site. The protection of the wetland and potential environmental impacts on it as a result of the proposed extension of Belhar Road and the development of a service station adjacent to Belhar Road have been considered in Scoping Checklists which have been compiled to provide environmental information on the construction of the road and service station (see below). The proposed housing development does not encroach on the wetland.

It should be noted however that the regulations under the Environment Conservation Act do apply to the extension of Belhar Road along the eastern and northern boundaries of the development (The construction or upgrading of roads) and the development of a service station in the southeastern portion of the site (The construction or upgrading of (c) with regard to any substance which is dangerous or hazardous and is controlled by national legislation (ii) manufacturing, storage, handling, treatment or processing for any such substances). In order to comply with the Environment Conservation Act with regard to these two activities a Scoping Checklist has been compiled for each of the activities and has been submitted for public comment. Once the public comment period if complete the reports will be submitted to the Department of Environment Affairs and Development Planning for their consideration. This however should not preclude the consideration of approval of the housing and commercial proposals for the site

I hope this information is of assistance. Should you require further information please contact me.

Yours faithfully



Doug Jeffery

## APPENDIX 1

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**NICK HELME BOTANICAL SURVEYS**

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**BOTANICAL ASSESSMENT OF ERF 1286 KUILSRIVER**

**NICK HELME**

**October 2002**

## **1. INTRODUCTION AND STUDY AREA**

This botanical assessment was commissioned by Doug Jeffery Environmental Consultants to help inform decisions regarding the proposed development of erf 1286 Kulisriver. The erf is located in an area of the Cape Flats with a long history of agriculture, and is currently heavily used for both housing and industry, and it is suspected that the entire erf has been used for agricultural purposes in the past, as there are well established planted windrows in the northwestern portion, as well as evidence of kikuyu meadows. The site has been recently burned (about two or three years ago). The soils are generally well drained deep sands of marine origin, and are thus likely to be slightly alkaline to slightly acid in terms of pH. The area marks the contact between the younger Witzands formation sands (alkaline) and the older Springfonteyn formation sands (neutral to slightly acid), and given the disturbed nature of the vegetation it is difficult to make a decision based on the vegetation as to what the dominant formation might be. There is no outcropping rock, and only in the southeastern corner of the site is there any evidence of seasonal wetlands. These wetlands occur on darker loamy sands that are probably derived from the granite hills to the east. The overall topography is very flat, with a few low dune ridges in the northeast, and the slightly lower ground with the wetlands in the southeast.

The site was visited on 4 October 2002, and the conservation value was assessed in local (Kulisriver/Blackheath) and regional (Cape Metropolitan Area) terms.

## **2. TERMS OF REFERENCE**

The terms of reference for this study were as follows:

- Describe the vegetation on the site, and indicate the local (Blackheath) and regional (Cape Metropolitan Area) conservation value of the area.

- Note any listed Red Data Book or locally endemic plant species that are or could be present.
- Indicate any special concerns about the site.

### 3. THE VEGETATION

The vegetation on site appears to have been heavily disturbed, probably by ploughing many decades ago. A recent fire (two or three years ago) has also impacted the landscape. The soils are mostly deep sands of marine origin and it is likely that the vegetation was transitional in nature, with elements of both Cape Flats Dune Thicket (on more alkaline sands) and Blackheath Sandplain Fynbos (slightly more acid soils). However, due to the previous disturbance the current plant communities are pioneers and very few species typical of mature forms of these two vegetation types are present today. Due to the lack of intact vegetation in the surrounding areas it is unlikely that natural reestablishment of many species will occur. The area can be broadly divided into two plant communities, determined largely by drainage. The well drained sands cover the majority of the site, and the seasonal wetlands cover probably less than 5% of the site.

#### 3.1 Seasonal Wetland within Sandplain Fynbos

In the extreme southeast corner of the site is a distinct wetland plant community on slightly darker, loamier soils. The higher clay content in these soils may be due to the presence of granitic clays which have weathered from the hills to the east. When I visited the site there was standing water in a number of places and a distinct short wetland plant community dominated by *Gynodon dactylon* (kweek grass), *Isolepis* sp., *Senecio littoreus*, *Cotula coronopifolia*, *Triglochin striata*, *Sarcocornia natalensis* (seekoraal), and *Sparaxis bulbifera*. Occasional species associated with this habitat include *Zantedeschia aethiopica* (arums), *Romulea flava* (frutang), and *Homeria minilata* (tulip). Plant species diversity is relatively low, and no species of conservation concern were noted (although a

limited number may still be present), which is probably a reflection of the disturbed nature of the area. The primary invasive species in this area is *Lolium* sp. (rye grass), and the slightly drier fringes are invaded by *Vicia sativa* (vetch), *Trifolium repens* (yellow clover), and *Acacia saligna* (Port Jackson). Aliens cover less than 20% of the habitat. Various birds typically associated with wetlands were also noted, such as Levalliant's Cisticola and Orangethroated Longclaw.

As wetlands of this nature are severely threatened in the Cape Flats the local and regional conservation value of this area is High.

### **3.2 Well drained Sandplain Fynbos**

The majority of the site (about 95%) consists of well drained sands that currently support a pioneer vegetation type that has replaced what was probably originally a mosaic of Blackheath Sandplain Fynbos and Cape Flats Dune Thicket. Species diversity is low, and much of the area is dominated by alien plants, with indigenous species probably covering less than 10% of the total area.

The dominant indigenous species are *Conicosia puglioniformis* (yellow varklomwygie), *Carpobrotus edulis* (suurvry), *Trachyandra divaricata* (duinekool), *Trachyandra ciliata*, *Capnophyllum africanum*, *Dimorpotheca pluvialis* (reengousblom), *Ehrharta villosa* (pypgras), *Helminthia membranacea*, and *Gynodon dactylon* (kweek). No species of conservation concern were noted, and none are likely to persist. Molerat density is high.

The dominant alien plants are the grasses *Bromus diandrus* (ripgut brome), *Rumex acetosella* (boksuring), *Lolium* sp. (rye), *Pennisetum clandestinum* (Kikuyu, probably planted as meadow), and *Avena* sp. (oats), the herbs *Raphanus rapistrum* (wildmostert) and *Echium plantagineum* (Patterson's curse), *Euphorbia pepius*, *Lupinus* sp. (lupin), and *Lotus subbiflorus*, and the shrub *Acacia saligna* (Port Jackson), which covers no more than 5% of the site.



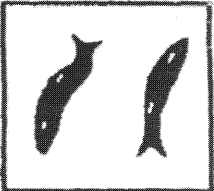
There are a few large planted pines (*Pinus pinaster*) in the north, and a couple of well established windrows of *Eucalyptus* sp. (bluegums) in the northwest. The area along Belhar Road is regularly bushcut.

The local botanical conservation value of this area is Moderate, and the regional value is Low.

#### **4. RECOMMENDATIONS**

- The well drained sands on site are of little botanical significance in the region as they have been significantly disturbed over a period of many years.
- The seasonal wetland in the southeast is worthy of conservation for its ecological value, and it is recommended that a buffer strip of at least 50m wide be left intact on all sides of the slight depression that marks the edges of the wetland. This buffer will help protect the catchment.
- Runoff from surrounding hard surfaces should not be directed into this wetland area as the associated pollutants will contaminate the area and lead to eutrophication of the system, which will encourage the growth of invasive alien plants.
- All alien plants should be removed by hand from the wetland area and its buffer in order to enhance its conservation value. No herbicides should be used for this task, except to poison the cut stumps of Port Jackson with Timbrel.

## APPENDIX 2



Agency for Cultural Resource Management  
Specialists in Archaeological Studies and Heritage Resource Management

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30 September 2002

Doug Jeffery  
Doug Jeffery Environmental Consultants  
PO Box 44  
Klapprus  
7625

6.7 Wetland buffer  
No mitigation necessary

Dear Doug

PHASE 1 ARCHAEOLOGICAL IMPACT ASSESSMENT, PROPOSED TOWNSHIP DEVELOPMENT ON ERF 1288, FARMS 438/1 & 438/4, KULLSRIVER

No archaeological remains were located during a Phase 1 Archaeological Impact Assessment of erf 1288, farms 438/1 and 438/4, in Kullsriver.

The proposed development of erf 1288 comprises township development. The location of the proposed development is illustrated in Figure 1.

No buildings, structures or features occur on the affected property.

The property comprises mainly vacant, undeveloped land, within a rapidly developing residential area, and adjacent vacant industrial and residential land.

The probability of locating any significant archaeological or historical remains during implementation of the project is considered to be very low.

The receiving environment is not archaeologically sensitive, vulnerable, or threatened.

The project should be allowed to proceed as planned.

Yours sincerely,

Jonathan Kaplan

Discussed with Janelle Deacon - This is OK to  
use Red.  
Std condition re should anything be found Only.  
G.M. 2003.10.06.