



KMG
Environmental
Solutions Services

**AGRICULTURAL IMPACT ASSESSMENT COMPLIANCE STATEMENT FOR THE
PROPOSED CONSTRUCTION OF STUDENT ACCOMMODATION AND
ASSOCIATED INFRASTRUCTURE IN SOSHANGUVE BLOCK M, CITY OF TSHWANE
METROPOLITAN MUNICIPALITY, GAUTENG PROVINCE**

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DATE OF SUBMISSION:

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AGRICULTURAL IMPACT ASSESSMENT COMPLIANCE STATEMENT
FOR THE PROPOSED CONSTRUCTION OF STUDENT ACCOMMODATION AND ASSOCIATED
INFRASTRUCTURE
IN SOSHANGUVE BLOCK M, CITY OF TSHWANE METROPOLITAN MUNICIPALITY, GAUTENG
PROVINCE

Project Title:

Govhani Student Accommodation Development

Project Location:

Erf 1305, Soshanguve Block M, City of Tshwane Metropolitan Municipality, Gauteng Province

Coordinates:

25°32'0.49"S, 28°5'25.24"E

Applicant:

Govhani Student Accommodation (Pty) Ltd

Environmental Assessment Practitioner (EAP):

Selahle Consultancy and Projects (Pty) Ltd

Specialist Study:

Agricultural Impact Assessment (AIA) Compliance Statement

Prepared by:

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Date:

November 2025

DOCUMENT INFORMATION

Document Title	Agricultural Impact Assessment (AIA) Compliance Statement
Project Name	Govhani Student Accommodation Development
Project Location	Erf 1305, Soshanguve Block M, City of Tshwane Metropolitan Municipality, Gauteng Province
Coordinates	25°32'0.49"S
Client / Applicant	Govhani Student Accommodation (Pty) Ltd
Environmental Assessment Practitioner (EAP)	Selahle Consultancy and Projects (Pty) Ltd
Specialist Study	Agricultural Impact Assessment Compliance Statement
Prepared by	KMG Environmental Solutions Services (Pty) Ltd
Prepared for	Selahle Consultancy and Projects (Pty) Ltd
Lead Specialist	Khumbelo Given Marabe (SACNASP Reg. No. 132731)
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Report Reference Number	KMG/AIA/SOS-BM/2025
Confidentiality Clause	This report is the property of KMG Environmental Solutions Services (Pty) Ltd and may not be reproduced or distributed without written permission.
Purpose of the Report	To assess and confirm compliance with the Agricultural Protocol (GN 320 of 2020) and determine the agricultural potential of the proposed development site for environmental authorisation purposes.

ACRONYMS AND ABBREVIATIONS

Acronym / Abbreviation	Meaning
AIA	Agricultural Impact Assessment
ALC	Agricultural Land Capability
BID	Background Information Document
DFFE	Department of Forestry, Fisheries and the Environment
DAFF	Department of Agriculture, Forestry and Fisheries (now under DARDLR)
DARDLR	Department of Agriculture, Rural Development and Land Reform
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
GDARD	Gauteng Department of Agriculture and Rural Development
GN	Government Notice
GPS	Global Positioning System
HVC	High Value Crop
LVC	Low Value Crop
NEMA	National Environmental Management Act (Act No. 107 of 1998)
NEM:BA	National Environmental Management: Biodiversity Act (Act No. 10 of 2004)
NEM:WA	National Environmental Management: Waste Act (Act No. 59 of 2008)
SA	South Africa
SACNASP	South African Council for Natural Scientific Professions
SANS	South African National Standards
SELAHLE CP	Selahle Consultancy and Projects (Pty) Ltd
KMG Enviro	KMG Environmental Solutions Services (Pty) Ltd
SoR	Statement of Reason
TUT	Tshwane University of Technology
GIS	Geographic Information System
ha	Hectare

m ²	Square metres
°S / °E	Degrees South / Degrees East

TERMS AND DEFINITIONS

Term	Definition
Agricultural Potential	The ability of land to support and sustain agricultural production based on factors such as soil quality, climate, slope, and access to water.
Agricultural Land Capability	The classification of land according to its potential and limitations for long-term sustainable agricultural use.
Arable Land	Land that is suitable for the cultivation of crops under normal management and rainfall conditions.
Basic Assessment (BA)	A process under the Environmental Impact Assessment Regulations (2014, as amended) used for developments that are likely to have limited environmental impacts.
Compliance Statement	A short specialist report confirming compliance with the relevant environmental or agricultural assessment protocol, as required by law.
High Potential Agricultural Land	Land with favourable soil, climate, and water conditions that allow for sustainable production of crops or grazing.
Low Potential Agricultural Land	Land with limitations (such as shallow soils or low rainfall) that restrict intensive agricultural use.
Protocol for Agricultural Assessment (GN 320 of 2020)	A Government Notice issued under NEMA that provides the minimum requirements and methods for conducting agricultural impact assessments.
Site Sensitivity Verification	The process of confirming the sensitivity of a site using field verification, aerial imagery, and available spatial data.

Soil Capability	The natural ability of a soil to support plant growth, based on its depth, structure, texture, and drainage characteristics.
Transformation	The change of land use from its natural or agricultural state to another form, such as residential, industrial, or commercial development.
Study Area	The area within which the proposed project and all related agricultural impacts will occur.
Specialist	A person registered with SACNASP who has expertise in a specific environmental or agricultural field and who conducts specialist studies for environmental authorisation.
Mitigation	The process of avoiding, minimising, or compensating for negative impacts on agricultural resources.

INDEMNITY AND DISCLAIMER

This report has been prepared by KMG Environmental Solutions Services (Pty) Ltd for the exclusive use of Selahle Consultancy and Projects (Pty) Ltd and Govhani Student Accommodation (Pty) Ltd, in support of an application for Environmental Authorisation for the proposed Student Accommodation and Associated Infrastructure Development in Soshanguve Block M, City of Tshwane Metropolitan Municipality, Gauteng Province.

The findings, interpretations, and recommendations contained in this report are based on professional judgement, information available at the time of compilation, and field verification conducted under the scope of work agreed upon.

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SPECIALISTS DECLARATION

I, **Khumbelo Given Marabe** declare that:

- I act as the independent specialist in this application.
- I consider myself bound to the rules and ethics of the South African Council for Natural Scientific Professions (SACNASP).
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant.
- I declare that there are no circumstances that may compromise my objectivity in performing such work.
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity.
- I will comply with the Act, Regulations and all other applicable legislation.
- I have no, and will not engage in, conflicting interests in the undertaking of the activity.
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan, or document to be prepared by myself for submission to the competent authority.
- All the particulars furnished by me in this form are true and correct; and
- I am aware that it is an offence in terms of Regulation 48 to provide incorrect or misleading information and that a person convicted of such an offence is liable to the penalties as contemplated in section 49B(2) of the National Environmental Management Act, 1998 (Act 107 of 1998).
- I realize that a false declaration is an offence in terms of Regulation 71 of NEMA and is punishable in terms of section 24F of the Act.

Signature

Khumbelo Given Marabe

SACNASP NO: 132731

WISA REG NO :39885

IAIAsa: Membership no: 7837

IIAV Member No. 3163

I, **Tshiamo Setsipane** declare that:

- I act as the independent specialist in this application.
- I consider myself bound to the rules and ethics of the South African Council for Natural Scientific Professions (SACNASP).
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant.
- I declare that there are no circumstances that may compromise my objectivity in performing such work.
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity.
- I will comply with the Act, Regulations and all other applicable legislation.
- I have no, and will not engage in, conflicting interests in the undertaking of the activity.
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan, or document to be prepared by myself for submission to the competent authority.
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- I realize that a false declaration is an offence in terms of Regulation 71 of NEMA and is punishable in terms of section 24F of the Act.

Signature

Tshiamo Setsipane (M.Sc)

SACNASP NO: 114882

EXECUTIVE SUMMARY

This Agricultural Impact Assessment (AIA) Compliance Statement has been prepared by KMG Environmental Solutions Services (Pty) Ltd for the proposed Govhani Student Accommodation Development located on Erf 1305, Soshanguve Block M, within the City of Tshwane Metropolitan Municipality, Gauteng Province. The purpose of this assessment is to confirm compliance with the Protocol for the Specialist Assessment and Minimum Report Content Requirements for Agricultural Assessments (GN 320 of 2020) under the National Environmental Management Act (NEMA, Act No. 107 of 1998). The project involves the construction of 27 four-storey accommodation blocks comprising approximately 2 505 student beds, together with a canteen, laundry, refuse area, parking, and security facilities.

The study aimed to evaluate the agricultural potential and sensitivity of the project site to determine whether the development would result in any loss of high-value agricultural land. The assessment process included a desktop review of national datasets such as the DFFE Agricultural Sensitivity Model (2023), DAFF Agricultural Land Capability Map (2020), and SOTER-SA Soil Database, combined with field verification of soil conditions, vegetation, and land use.

The site verification confirmed that the area is highly disturbed and urbanised, with no evidence of active agriculture. The site surface is dominated by dry disturbed grassland, ruderal shrubs, and patches of bare compacted soil. Rock outcrops and shallow reddish-brown sandy-loam soils were observed, limiting both soil depth and water-holding capacity. No irrigation systems, fencing, or farm infrastructure were present. The surrounding land uses include formal residential housing, municipal infrastructure, and educational institutions, notably the Tshwane University of Technology (TUT) Soshanguve Campus, confirming the site's integration into an urban development zone.

According to the National Soil and Terrain Database (SOTER-SA), the area falls within Soil Unit PTe, representing the Hutton–Clovelly soil association, which is characterised by sandy to sandy-loam texture, low organic matter, and limited fertility. These soils are classified under Land Capability Classes IV–V, denoting low to very low agricultural potential. The climatic conditions of the Soshanguve area, with an average annual rainfall of 650–700 mm and mean summer temperatures of 27°C, further restrict the feasibility of any sustainable dryland farming.

The DFFE Agricultural Sensitivity Model (2023) identified the project site as having Very Low Agricultural Sensitivity, a classification confirmed during on-site verification. Given that the area is

already zoned for Residential 4 use and exhibits no remaining arable value, the development poses no threat to agricultural resources or food security. Consequently, in terms of GN 320 of 2020, this study qualifies as a Compliance Statement, and no detailed Agricultural Impact Assessment is required.

The potential agricultural impacts associated with the project were assessed as negligible. The only identified change would be the formalisation of land that has already been transformed and rendered agriculturally unproductive. Mitigation measures recommended include limiting unnecessary soil disturbance during construction, implementing erosion control through stormwater management, stabilising exposed areas post-construction, and preventing waste dumping. These actions are precautionary in nature and are not required to preserve agricultural function but to maintain general environmental integrity.

In conclusion, the proposed Govhani Student Accommodation Development is located on land that has no current or future agricultural value. The site's shallow soils, low fertility, semi-arid climate, and urban transformation render it unsuitable for any agricultural production. The project is therefore fully compliant with the agricultural assessment protocol (GN 320 of 2020) and consistent with both municipal spatial planning objectives and the Gauteng Provincial Agricultural Policy Framework (2020).

This Compliance Statement confirms that the proposed development will not result in the loss of viable agricultural land, and the transformation of the site to an institutional urban use is environmentally acceptable and aligned with sustainable land-use planning principles.

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SECTION 1: INTRODUCTION

1.1 Project Background

Govhani Student Accommodation (Pty) Ltd proposes to construct a student housing development comprising 27 four-storey accommodation blocks with a total of approximately 2 505 beds, together with supporting infrastructure such as a canteen, recreational area, laundry, refuse facility, parking area, and security buildings.

The proposed development is located on Erf 1305, Soshanguve Block M, within the City of Tshwane Metropolitan Municipality, Gauteng Province, approximately 30 km north of Pretoria. The central coordinates of the site are 25°32'0.49"S and 28°5'25.24"E.

This Agricultural Impact Assessment (AIA) Compliance Statement has been compiled by KMG Environmental Solutions Services (Pty) Ltd in terms of the Protocol for the Specialist Assessment and Minimum Report Content Requirements for Agricultural Assessments (GN 320 of 20 March 2020) under the National Environmental Management Act (NEMA), 1998 (Act 107 of 1998).

The protocol requires that, where a site is verified as having low or very-low agricultural sensitivity, a *Compliance Statement* be prepared to confirm that a detailed agricultural assessment is not required.



Figure 1: Locality Map showing the position of the proposed Govhani Student Accommodation site within Soshanguve Block M, main access roads, and nearby landmarks.

1.2 Purpose of the Assessment

The purpose of this study is to evaluate the agricultural sensitivity and potential of the project area and to verify compliance with the national agricultural protocol.

Specifically, the assessment seeks to:

- Confirm the agricultural sensitivity rating of the site using national datasets and field verification;
- Determine whether the proposed development will lead to any loss or transformation of agricultural land;
- Provide a professional opinion on the suitability of the site for non-agricultural development; and
- Recommend any mitigation or management measures necessary to protect agricultural resources where relevant.

Table 1: Summary of Project Information

Project Element	Description
Project Name	Govhani Student Accommodation Development
Project Type	Construction of 27 four-storey student accommodation blocks
Bed Capacity	± 2 505 beds
Associated Facilities	Canteen, recreation area, laundry, refuse area, parking, and security buildings
Property Description	Erf 1305, Soshanguve Block M
Coordinates	25°32'0.49"S ; 28°5'25.24"E
Land Ownership	Govhani Student Accommodation (Pty) Ltd
Current Zoning	Residential 4
EAP	Selahle Consultancy and Projects (Pty) Ltd

Specialist	KMG Environmental Solutions Services (Pty) Ltd
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1.3 Scope of Work

The scope of this compliance statement includes the following key tasks:

1. Review of available background information from the EAP and the project’s technical documentation;
2. Desktop analysis of national datasets such as the *DAFF Agricultural Land Capability Map*, *National Land Cover (2018)*, and *National Soil Database*;
3. Field verification using aerial imagery and on-site observations to confirm land use, vegetation, slope, and visible soil conditions;
4. Determination of agricultural potential within the site and its immediate surroundings; and
5. Preparation of this Compliance Statement in line with the requirements of *GN 320 of 2020*.

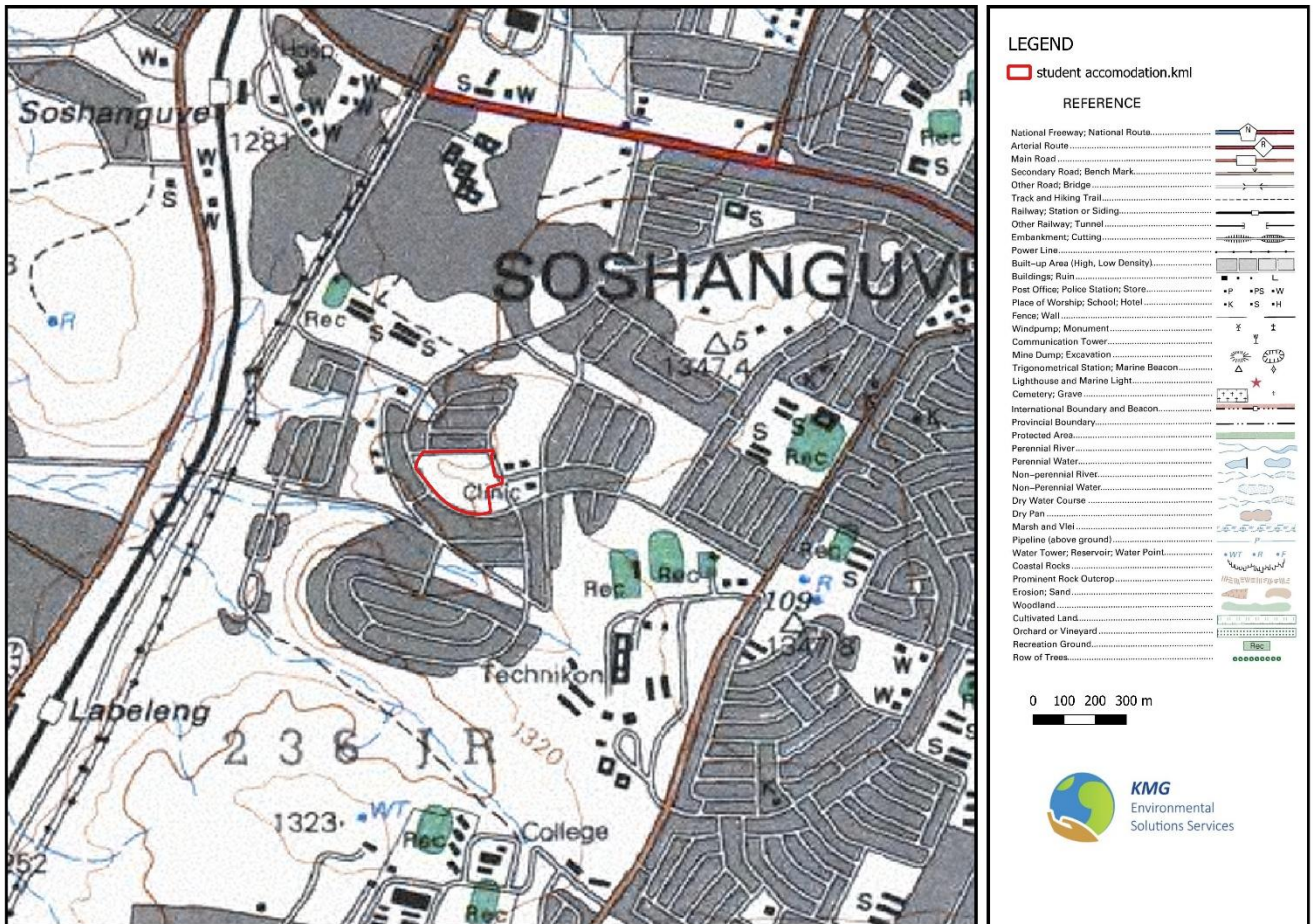


Figure 2: Map or aerial image indicating the boundary of the study area and surrounding land-use context (e.g., nearby residential areas, open spaces, and roads).

1.4 Assumptions and Limitations

- The study is based on **available spatial datasets** and **site observations** at the time of assessment.
- No **detailed soil sampling or laboratory analysis** was undertaken, as the site's sensitivity level does not warrant a full agricultural impact assessment.
- The **agricultural potential** is considered at a **desktop verification level**, adequate for compliance-statement purposes.

SECTION 2: APPLICABLE LEGISLATION AND POLICY FRAMEWORK

This section outlines the key legislative and policy instruments guiding the preparation of this Agricultural Impact Assessment (AIA) Compliance Statement. The project is subject to several national and provincial laws that regulate land use, agricultural land transformation, and environmental management.

2.1 National Environmental Management Act (Act No. 107 of 1998)

The National Environmental Management Act (NEMA) provides the overarching framework for environmental governance in South Africa. It requires that any listed activity which may significantly affect the environment must undergo an environmental assessment process before authorisation. The proposed development triggers listed activities under Listing Notice 1 (Activity 27 of GN R327) and Listing Notice 3 (Activity 12(c)), necessitating a Basic Assessment process and related specialist inputs, including this agricultural compliance statement.

2.2 Conservation of Agricultural Resources Act (Act No. 43 of 1983)

The Conservation of Agricultural Resources Act (CARA) promotes the conservation of soil, water, and vegetation resources. It regulates activities such as cultivation on slopes, overgrazing, and soil erosion. Although the site is not under active agricultural use, this act provides the baseline for preventing unnecessary degradation of land that could still support limited agricultural potential.

2.3 Protocol for the Specialist Assessment and Minimum Report Content Requirements for Agricultural Assessments (GN 320 of 2020)

This protocol, issued under NEMA, prescribes the minimum requirements for agricultural impact assessments. It states that where a site is verified as having low or very low agricultural sensitivity, a Compliance Statement (instead of a full specialist report) must be prepared by a registered SACNASP

professional.

This report therefore meets the requirements of GN 320 of 2020.

2.4 Spatial Planning and Land Use Management Act (SPLUMA, Act No. 16 of 2013)

SPLUMA provides the framework for spatial planning and land-use decision-making in South Africa. The proposed development is consistent with the municipal land-use zoning (Residential 4) for Soshanguve Block M, and therefore does not conflict with current land allocation frameworks.

2.5 National Environmental Management: Biodiversity Act (Act No. 10 of 2004)

The NEM:BA ensures the protection of ecosystems and indigenous species. While this report focuses on agricultural potential, the vegetation component is briefly considered under land capability verification to ensure that no protected or conservation-significant species are affected by the development.

2.6 Gauteng Agricultural Policy Framework

The Gauteng Department of Agriculture and Rural Development (GDARD) promotes efficient and sustainable land use within the province. The Department supports urban densification projects that utilise already transformed land, which aligns with the nature of this development.

Table 2: Summary of Applicable Legislative Framework

Legislation / Policy	Purpose / Relevance	Application to Project
NEMA, Act 107 of 1998	Environmental authorisation for listed activities	Triggers Basic Assessment process
CARA, Act 43 of 1983	Conservation of soil and natural resources	Ensures no soil erosion or overgrazing
GN 320 of 2020	Sets requirements for AIA and Compliance Statements	Determines reporting format
SPLUMA, Act 16 of 2013	Guides municipal land-use and zoning	Confirms land use compliance
NEM:BA, Act 10 of 2004	Protection of biodiversity	Confirms no ecological conflicts
GDARD Agricultural Policy	Provincial framework on land use	Supports urban development on low potential land

SECTION 3: METHODOLOGY AND APPROACH

The methodology used for this Agricultural Compliance Statement follows the requirements outlined in GN 320 of 2020 and best-practice principles for environmental assessment.

3.1 Overview of the Assessment Process

The assessment process included a **desktop study**, **spatial data analysis**, and **site verification** to confirm the agricultural sensitivity rating of the study area.

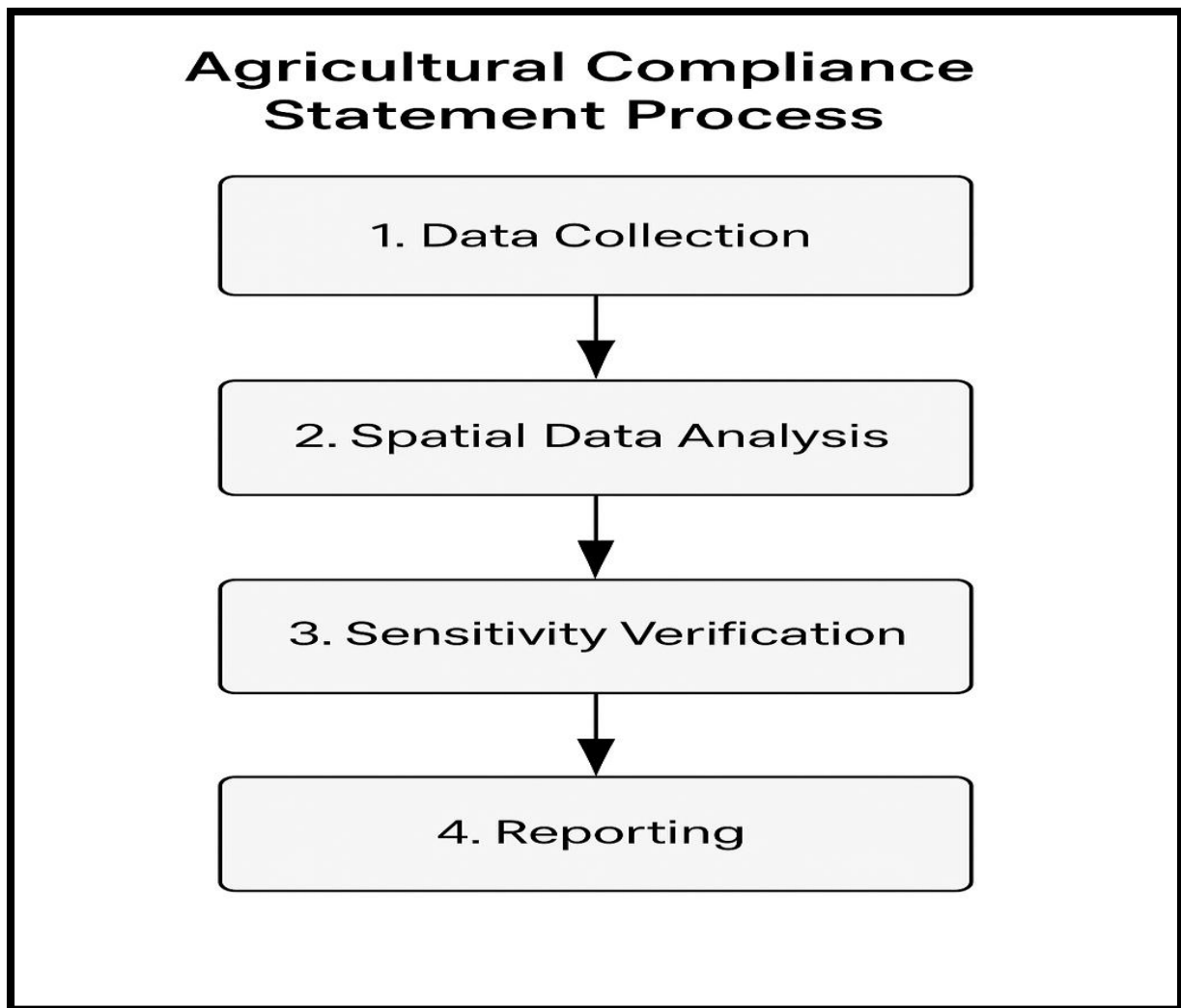


Figure 3: Flow diagram illustrating the Agricultural Compliance Statement process — from data collection to sensitivity verification and reporting.

3.2 Data Sources and References

The following national datasets and spatial layers were reviewed:

Table 3 : Data Sources and References

Dataset / Source	Description	Provider / Year
National Land Cover	2018 Land Cover dataset showing transformation extent	DFFE (2018)
Agricultural Land Capability Map	Indicates potential agricultural productivity	DAFF (2020)
Soil and Terrain Database (SOTER-SA)	Provides regional soil types and structure	ARC (2018)
DFFE Agricultural Sensitivity Model	National agricultural sensitivity layer	DFFE (2023)
SRTM 30m Digital Elevation Data	Used for slope and drainage analysis	NASA (2022)
Aerial Imagery	Used for visual confirmation of site conditions	Google Earth (2025)

3.3 Site Verification

A site inspection was undertaken to visually confirm land cover, soil type, and surrounding land uses. Observations confirmed that:

- The land is disturbed and not cultivated;
- No active farming or irrigation occurs on or near the site;
- Vegetation is dominated by urban grassland and invasive species.

3.4 Sensitivity Verification Procedure

The site’s agricultural sensitivity was verified following the DFFE Screening Tool (2023) process, which involves:

1. Uploading the project footprint to the DFFE Online Screening Tool;
2. Generating an Agricultural Theme Sensitivity Report;
3. Conducting field verification to confirm or adjust the sensitivity rating; and
4. Preparing this Compliance Statement if the verified sensitivity is “Low” or “Very Low.”

3.5 Limitations

- The study relied on existing datasets and visual verification, not laboratory soil testing.
- The area’s urban transformation limits baseline soil data availability.

- The findings are adequate for compliance verification, not detailed soil capability modelling.

SECTION 4: STUDY AREA DESCRIPTION AND ENVIRONMENTAL SETTING

4.1 Location and Access

The proposed Govhani Student Accommodation Development is situated on Erf 1305, Soshanguve Block M, within the City of Tshwane Metropolitan Municipality, Gauteng Province. The site lies approximately 30 km north of Pretoria, between the developed residential suburbs of Soshanguve and Mabopane, and is accessible via Flower Street, which connects to the R80 Mabopane Highway. The coordinates of the central point of the project area are 25°32'0.49" S and 28°5'25.24" E.

The site falls within a well-developed municipal zone that includes residential dwellings, local businesses, educational institutions, and supporting infrastructure. The Tshwane University of Technology (TUT) Soshanguve Campus is located nearby, strengthening the relevance of the project's proposed use as student accommodation.

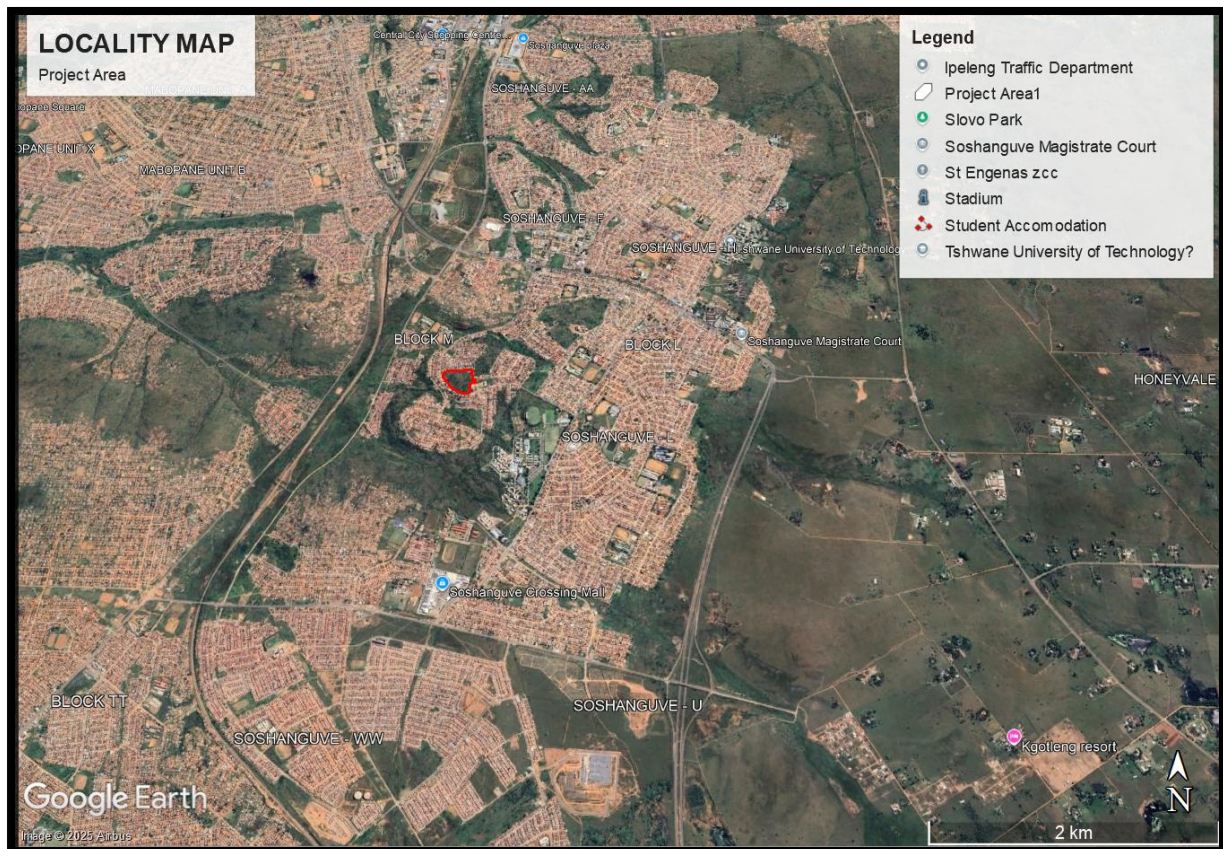


Figure 4: Locality Map showing the project site within the regional context of Soshanguve Block M and its surrounding settlements (Mabopane, Ga-Rankuwa, and TUT Campus).

4.2 Land Use and Surrounding Environment

The current land use of the project area is vacant and degraded, with visible signs of prolonged urban disturbance. The surrounding land is dominated by formal residential housing, educational

facilities, and municipal infrastructure. There is no evidence of agricultural activity such as ploughed fields, grazing, irrigation systems, or farming structures. The site surface is compacted in several areas due to human movement and informal access paths.

Scattered litter and rubble were observed during field verification, along with degraded patches of dry grassland and ruderal (weedy) species. These conditions are typical of post-urban edge landscapes that have lost their agricultural potential due to compaction, erosion, and anthropogenic interference.



Figure 5: **Photo Plate 1:** Rocky, shallow, and disturbed landscape with sparse thorn trees and nearby houses, confirming the site's urban setting and very low agricultural potential.



Figure 6 : **Photo Plate 2:** Shallow rocky ground with scattered shrubs and thorn trees on dry reddish soil, indicating degraded vegetation and very low agricultural potential.



Figure 7: Photo Plate 3: A dry, disturbed open area with sparse grass, litter, and scattered shrubs, indicating degraded soil and complete loss of agricultural potential.



Figure 8 : Photo Plate 4: A dry, eroded area with sparse grass, scattered litter, and rocky patches, confirming disturbed shallow soils and very low agricultural suitability.

4.3 Climate

The study area is located in the semi-arid Highveld climate zone, characterised by warm, wet summers and cool, dry winters. The mean annual rainfall is between 650 and 700 mm, mostly received between October and March in the form of convective thunderstorms. The mean maximum temperature in summer is approximately 27°C, while mean minimum winter temperatures can drop to 5–7°C.

Rainfall variability is high, and dry spells often occur between late summer and autumn. Annual evaporation rates exceed rainfall totals, which limits soil moisture retention and plant growth potential. The combination of low rainfall, seasonal dryness, and shallow soil profiles results in low agricultural viability.

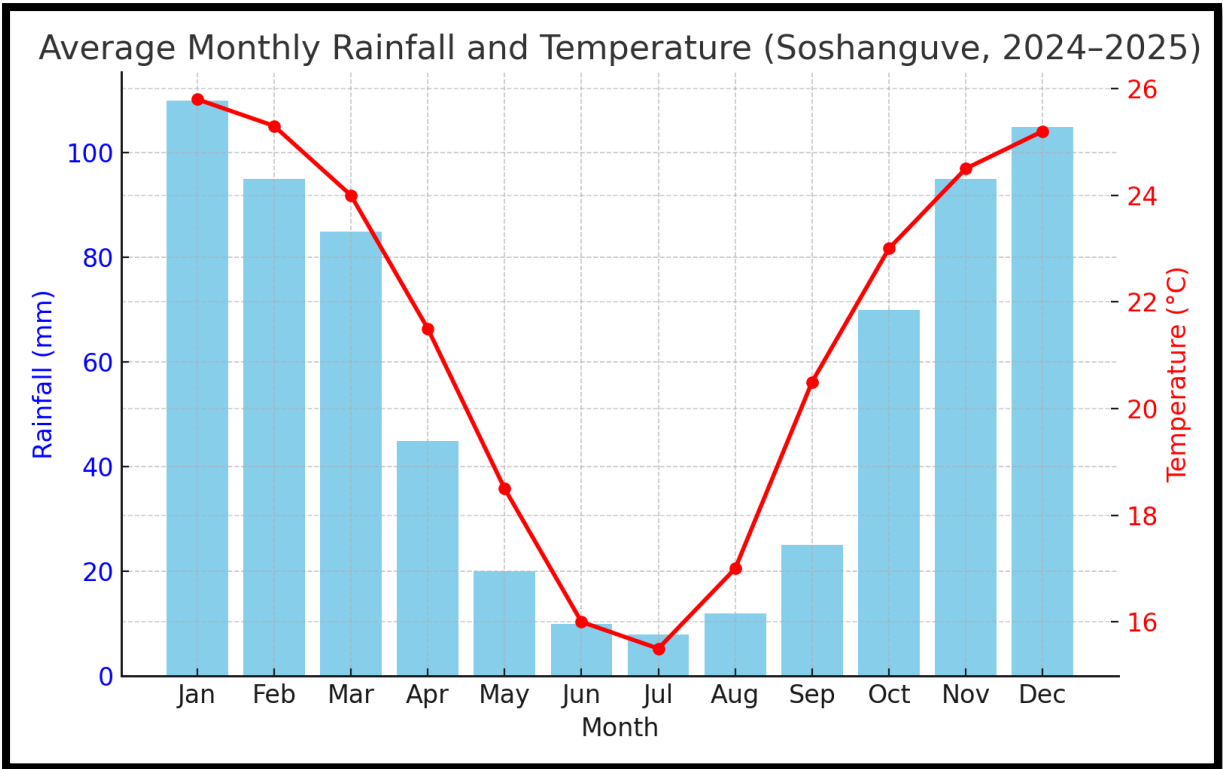


Figure 9: Average Monthly Rainfall and Temperature Graph (Soshanguve, 2024–2025) showing seasonal rainfall pattern and temperature variation.

4.4 Topography and Drainage

The topography of the project area is gently undulating, with elevation ranging from 1 210 to 1 240 metres above sea level. The slope gradient averages 1–3%, draining mildly towards the south-west into small ephemeral drainage lines. No permanent surface water bodies or wetlands occur within the site or its immediate vicinity.

Surface runoff during heavy rains is typically shallow and short-lived, and there is no evidence of erosion gullies or flood scouring. The terrain is stable and favourable for infrastructure construction but offers minimal agricultural potential due to shallow topsoil and compacted sublayers.

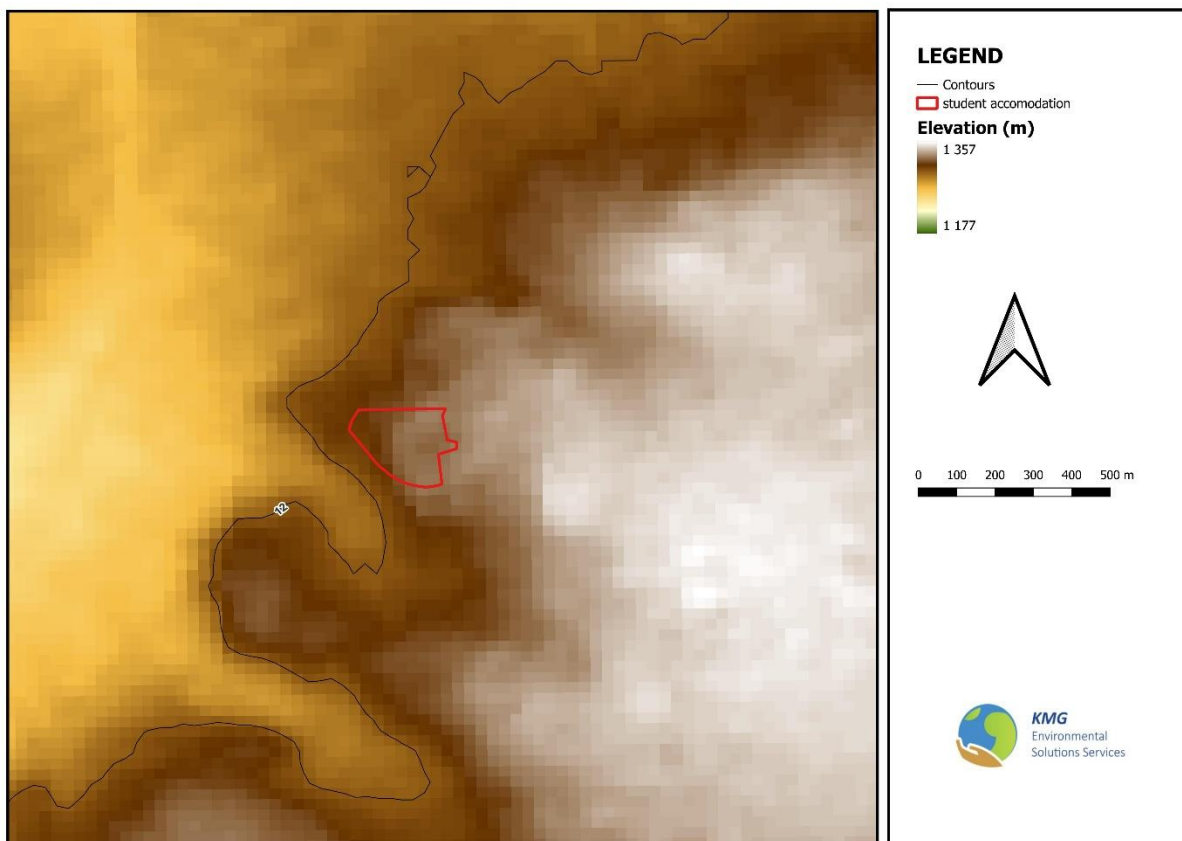


Figure 10 : Topographic Map showing the project site’s elevation gradient

4.5 Soil Characteristics and Land Capability

The Soil Type Map derived from the National Soil and Terrain Database (SOTER-SA) identifies the soil unit across the project area as PTe, part of the Hutton–Clovelly soil association. These soils are red to reddish-brown sandy-loam with moderate drainage and shallow to medium depth (300–600 mm). The corresponding polygon (ZA578) specifies lithology I4I (ferruginous sandy loam) and landform LP (low-lying plains).

These soils are typically well-drained and resist waterlogging but have low nutrient content, low organic matter, and a tendency to compact under repeated surface disturbance. They fall within Agricultural Land Capability Classes IV–V, which are classified as low to very low potential for cultivation. The limiting factors include restricted rooting depth, poor water-holding capacity, and low natural fertility.

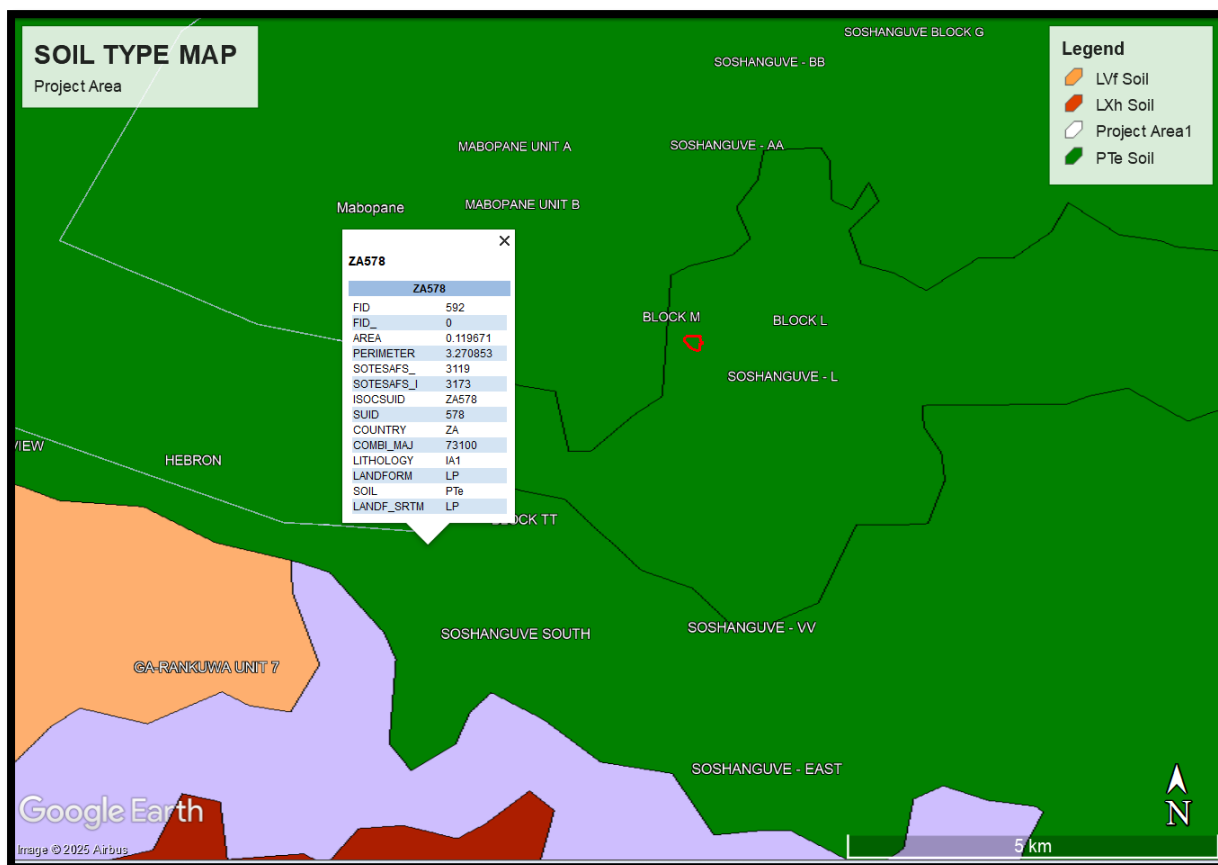


Figure 11: Soil Type Map of the Project Area showing Soil Unit PTe (Hutton–Clovelly association) and adjacent soil units LVf and LXh.

Table 4: Summary of Soil Properties and Agricultural Capability.

Soil Property	Description	Agricultural Implication
Soil Type	PTe – Hutton/Clovelly Association	Low fertility, sandy texture
Colour	Reddish-brown	Typical of ferruginous soils
Texture	Sandy to sandy-loam	Poor nutrient retention
Depth	300–600 mm	Shallow, limits root penetration
Drainage	Moderate	Prone to rapid drying
Organic Matter	Low	Low productivity
Capability Class	IV–V	Very low agricultural potential



Figure 12 Photo Plate 5: Field photo showing shallow rocky surface and reddish sandy-loam topsoil within the project area.

4.6 Vegetation and Natural Land Cover

Historically, the area fell under the Marikana Thornveld vegetation type within the Savanna Biome (Mucina & Rutherford, 2012). However, due to extensive human settlement, the original vegetation has been replaced by disturbed secondary grassland and ruderal shrubs. The dominant species include *Acacia karroo*, *Dichrostachys cinerea*, *Cynodon dactylon*, and scattered forbs adapted to disturbance.

No species of conservation importance were recorded during the site verification. The vegetation provides no grazing or cultivation potential, and the remaining cover serves only to stabilise exposed soil surfaces.



Figure 13: Degraded vegetation cover with scattered thorny shrubs and dry reddish-brown soil with sparse grass and scattered, reflecting shallow, rocky terrain and confirming the site's very low agricultural potential.

4.7 Agricultural Sensitivity Verification

The DFFE Agricultural Sensitivity Model (2023) and on-site verification confirmed that the project site falls within a Low Agricultural Sensitivity zone. The field photographs reveal shallow soils, exposed rock, and no agricultural infrastructure, while the surrounding landscape is fully urbanised.

This verification confirms that the project area does not qualify as agricultural land in terms of the Protocol for Agricultural Assessments (GN 320 of 2020) and that the preparation of a Compliance Statement (rather than a full Agricultural Impact Assessment) is sufficient for environmental authorisation.

4.8 Summary of Environmental and Agricultural Conditions

Table 5: Summary of Environmental and Agricultural Conditions

Parameter	Description	Agricultural Relevance
Land Use	Urban residential and disturbed vacant land	Non-agricultural
Vegetation	Secondary Marikana Thornveld	Degraded, low potential
Soil Type	P _{Te} – Hutton/Clovelly (sandy-loam)	Shallow, low fertility
Terrain	Gently undulating (1–3% slope)	Stable but non-arable
Climate	Semi-arid, 650–700 mm rainfall/year	Unsuitable for dryland farming
Capability Class	IV–V	Low to very low potential
Sensitivity Rating	Very Low	No agricultural impact expected

4.9 Summary Statement

In summary, the Govhani Student Accommodation Project site within Soshanguve Block M is an urban-transformed landscape with low soil fertility, rocky terrain, and minimal vegetation cover. The soils belong to the Hutton–Clovelly (P_{Te}) unit, which has very low agricultural capability, and the entire area is classified as having Very Low Agricultural Sensitivity.

Based on field verification, climatic data, and GIS mapping, it is concluded that the project site holds no viable agricultural potential. The land is therefore more suitable for urban and institutional development in accordance with municipal zoning and planning frameworks.

SECTION 5: IMPACT ASSESSMENT AND COMPLIANCE FINDINGS

5.1 Overview

This section presents the assessment of potential agricultural impacts associated with the proposed Govhani Student Accommodation Development. The assessment follows the DFFE Agricultural Assessment Protocol (GN 320 of 2020), considering both construction and operational phases of the project.

The purpose of this section is to:

- Identify and describe any direct or indirect impacts on agricultural resources;
- Assess the significance and extent of such impacts; and
- Confirm the level of compliance with the prescribed protocol.

5.2 Impact Identification

The proposed development will occur entirely within a transformed urban area with very low agricultural potential. The site has no current or foreseeable agricultural value due to urban zoning, soil limitations, and existing infrastructure.

The key impact considered is the permanent loss of low-potential agricultural land, although this loss is negligible within the municipal context.

Table 6: Impact Identification and Assessment Summary

Impact Description	Phase	Nature of Impact	Extent	Duration	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Loss of low-potential agricultural land due to land transformation	Construction	Negative (direct)	Local (<2 ha)	Permanent	Low	None required; land already transformed	Negligible
Soil disturbance and compaction from construction vehicles	Construction	Negative (temporary)	Site-specific	Short-term	Low	Limit movement of heavy machinery, rehabilitate open areas	Very Low
Reduced infiltration and increased runoff due to impervious surfaces	Operation	Negative (indirect)	Site-specific	Long-term	Low	Implement stormwater management	Low
Potential for dust deposition on surrounding open ground	Construction	Negative (temporary)	Localised	Short-term	Low	Apply dust suppression during earthworks	Very Low

5.3 Significance Rating Summary

The overall agricultural significance of the proposed project is negligible because:

- The site is not currently used for agricultural purposes;
- The land capability is Class IV–V (low potential);
- The soils are shallow, sandy, and nutrient-poor; and
- The land is zoned for residential development, not agriculture.

5.4 Compliance with GN 320 of 2020

According to the Protocol for the Specialist Assessment and Minimum Report Content Requirements for Agricultural Assessments (GN 320 of 2020):

Protocol Requirement	Compliance Status	Evidence / Reference
Site sensitivity verified using DFFE Screening Tool	Compliant	DFFE Screening Tool Report (2025)
Agricultural specialist registered with SACNASP	Compliant	SACNASP Reg. No. 132731
Site verified as Low/Very Low sensitivity	Compliant	Field verification and spatial data
Compliance Statement prepared by qualified specialist	Compliant	This document
Recommendations provided for mitigation (if required)	Compliant	Section 5.5 below

5.5 Mitigation and Management Measures

Although the site has **very low agricultural potential**, basic mitigation measures are proposed to ensure sustainable land use and environmental integrity:

- Limit unnecessary soil disturbance during construction.
- Implement stormwater control measures to prevent erosion.
- Stabilise exposed areas after construction using grass cover or paving.

- Avoid illegal dumping of construction waste on open ground.
- Promote landscaping with indigenous vegetation to maintain soil stability.

5.6 Cumulative Impact Consideration

At the municipal level, the cumulative loss of low-potential land due to urban growth is insignificant in terms of agricultural productivity. The site forms part of a planned urban development node near a major educational hub, aligning with spatial development policies promoting densification and efficient land use.

5.7 Summary of Findings

Assessment Component	Outcome
Agricultural Sensitivity	Very Low
Agricultural Land Capability	Class IV–V (Low Potential)
Existing Land Use	Urban / Transformed
Active Agricultural Activity	None
Potential Impact on Agriculture	Negligible
Need for Further Specialist Study	Not Required
Compliance with GN 320 of 2020	Fully Compliant

SECTION 6: CONCLUSIONS AND RECOMMENDATIONS

The results of this Agricultural Impact Assessment Compliance Statement confirm that the proposed Govhani Student Accommodation Development, situated on Erf 1305, Soshanguve Block M within the City of Tshwane Metropolitan Municipality, is located on land that holds no viable agricultural potential. The site verification, supported by spatial datasets and field evidence, revealed a landscape that is highly disturbed, shallow-soiled, and urban in character. The land surface consists of reddish-brown sandy-loam soils with a depth of approximately 300–600 mm, exhibiting low organic matter, poor moisture retention, and limited fertility. These soils belong to the Hutton–Clovelly (PTE) association, which is typically classified under Land Capability Classes IV–V, representing low to very low agricultural potential.

The vegetation across the site is dominated by secondary Marikana Thornveld, consisting mainly of *Acacia karroo*, *Dichrostachys cinerea*, and ruderal grass species, all indicative of long-term disturbance

and ecological transformation. No crops, grazing activity, or farming infrastructure were identified during the field verification. The surrounding land is fully urbanised, bordered by residential developments, educational facilities, and roads, confirming that the site is part of a developed municipal environment and not a productive agricultural landscape.

Climatically, the region is semi-arid with average annual rainfall of approximately 650–700 mm, concentrated in summer months. Combined with shallow soils and variable rainfall, these conditions severely limit sustainable agricultural productivity. The Department of Forestry, Fisheries and the Environment (DFFE) Agricultural Sensitivity Model (2023) classifies the project area as Very Low Agricultural Sensitivity, which is consistent with field observations. Based on the Protocol for the Specialist Assessment and Minimum Report Content Requirements for Agricultural Assessments (GN 320 of 2020), this project qualifies for a Compliance Statement, as a detailed agricultural impact assessment is not warranted.

From an agricultural perspective, the transformation of this site will not result in the loss of any high- or medium-potential agricultural land. The land has already been degraded through human activity, and its rehabilitation for farming would be impractical and unsustainable. The conversion of the land to a student accommodation development therefore represents an appropriate and sustainable land use, aligning with the City of Tshwane Spatial Development Framework and the Gauteng Agricultural Policy Framework (GDARD, 2020).

Although the agricultural significance of the site is negligible, a few precautionary environmental management measures are recommended during the construction phase to ensure good land stewardship and avoid unnecessary soil degradation. These include:

- Limiting ground disturbance and heavy machinery movement to designated construction zones;
- Implementing stormwater control and erosion prevention measures on exposed surfaces;
- Stabilising disturbed areas using paving or grass cover after construction;
- Ensuring that no dumping or contamination of soil occurs from construction waste; and
- Promoting indigenous landscaping post-construction to improve visual quality and soil stability.

In conclusion, the land earmarked for the Govhani Student Accommodation Project is unsuitable for any agricultural use due to its poor soil quality, shallow profile, and location within a fully urbanised setting. The development will not contribute to the loss of agricultural resources, and its

implementation will not compromise regional food security or agricultural sustainability. The project is therefore fully compliant with GN 320 of 2020 and the National Environmental Management Act (Act 107 of 1998).

This statement confirms that the proposed development is agriculturally acceptable, environmentally sustainable, and aligned with national and provincial land-use planning principles.

SECTION 7: REFERENCES

- Department of Agriculture, Forestry and Fisheries (DAFF). 2020. National Agricultural Land Capability Dataset. Pretoria: Directorate of Land Use and Soil Management.
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- Department of Forestry, Fisheries and the Environment (DFFE). 2020. Protocol for the Specialist Assessment and Minimum Report Content Requirements for Agricultural Assessments (Government Notice No. 320 of 20 March 2020). Government Gazette No. 43110, Pretoria.
- Department of Environmental Affairs (DEA). 2014. Environmental Impact Assessment Regulations under the National Environmental Management Act (Act No. 107 of 1998), as amended. Pretoria: DEA.
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- Mucina, L. & Rutherford, M.C. 2012. The Vegetation of South Africa, Lesotho and Swaziland. Strelitzia 19, South African National Biodiversity Institute (SANBI), Pretoria.
- National Environmental Management Act (NEMA). Act No. 107 of 1998. Republic of South Africa.
- Conservation of Agricultural Resources Act (CARA). Act No. 43 of 1983. Republic of South Africa.
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- South African Council for Natural Scientific Professions (SACNASP). 2024. Professional Conduct Code and Registration Guidelines. Pretoria: SACNASP.
- Google Earth Pro Imagery. 2025. Soshanguve Block M, City of Tshwane, Gauteng Province. Accessed October 2025.
- City of Tshwane Metropolitan Municipality. 2024. Integrated Development Plan (IDP) and Spatial Development Framework (SDF). Pretoria: CoT.

8. APPENDICES

Appendix A: Specialist Declaration and Team Curriculum Vitae(s)

I, Khumbelo Given Marabe, declare that I:

- I act as the independent specialist in this application.
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favorable to the applicant.
- I declare that there are no circumstances that may compromise my objectivity in performing such work.
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity.
- I will comply with the Act, Regulations and all other applicable legislation.
- I have no, and will not engage in, conflicting interests in the undertaking of the activity.
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan, or document to be prepared by myself for submission to the competent authority.
- All the particulars furnished by me in this form are true and correct; and
- Am aware that it is an offence in terms of Regulation 48 to provide incorrect or misleading information and that a person convicted of such an offence is liable to the penalties as contemplated in section 49B(2) of the National Environmental Management Act, 1998 (Act 107 of 1998).
- I realize that a false declaration is an offence in terms of Regulation 71 of NEMA and is punishable in terms of section 24F of the Act.

Signature



Khumbelo Given Marabe

SACNASP NO: 132731

WISA REG NO :39885

IAIASa : Membership no: 7837

IIAV Member No. 3163

Appendix B: SPECIALIST CV

Mr Khumbelo Given Marabe

Principal Environmental Consultant | Director – KMG Environmental Solutions Services (Pty) Ltd

SACNASP Registered – Reg. No. **132731**

WISA Professional Process Controller – Reg. No. **39885**

Summary of Expertise:

Mr. Marabe is an experienced environmental specialist with over a decade of expertise in:

- Visual, Social, Wetland and Terrestrial Impact assessments
- Agricultural and soil capability impact assessments
- Noise, air quality, water, and dust monitoring
- Environmental awareness training
- Environmental audits and licensing applications
- NEMA and NWA compliance
- Environmental management and monitoring across sectors including mining, manufacturing, and renewable energy

Education & Certifications:

- BSc Environmental Sciences – University of Venda
- NEBOSH Environmental Management Certificate (2024)
- ISO 45001 & ISO 14001 Implementation & Internal Auditor – NOSA
- Health and Safety Regulations – HASLAC
- Certificates in Management Development (GIBS – AECI Programmes)
- Honours in Environmental Monitoring & Modelling (ongoing – UNISA)

Ms. Jeniffer Mutsila

Environmental GIS and Mapping Technician

Affiliation: KMG Environmental Solutions Services (Pty) Ltd

Junior Environmental Assessment Practitioner, Environmental Mapping & spatial analysis

Professional Overview:

Ms. Jeniffer Mutsila is a technically skilled Environmental Mapping and GIS Technician with a background in field-based wetland delineation and spatial data analysis. He provides vital support in environmental assessments by producing geospatial products and performing site-level data validation for use in Environmental Impact Assessments (EIAs), Basic Assessments (BAs), Wetland Impact Assessments, and Water Use Licence Applications (WULAs).

With hands-on experience in both **desktop and field applications**, Jeniffer brings a valuable blend of practical and digital expertise to complex projects that require environmental sensitivity mapping, buffer zone compliance checks, and spatial integration of biodiversity datasets.

Core Competencies:

- GIS Mapping & Spatial Analysis (ArcGIS, QGIS)
- GPS-based Field Surveying and Data Collection
- Wetland and Riparian Zone Delineation Support
- Environmental Reporting: BAR, EIA, EMPr, EMP, WULA, EPR
- Legislation Knowledge: NEMA, Water Act, Waste Act, Air Quality Act, MPRDA

Key Project Contributions:

◆ Wetland Mapping and Sensitivity Overlay Support

- Developed comprehensive map series for **prospecting right applications** in the North West and Limpopo provinces, including:
 - ✓ **Wetland Classification Maps** (HGM units: seep, valley-bottom, flat wetlands)
 - ✓ **30 m Riparian Buffer Sensitivity Maps**
 - ✓ **500 m Regulated Area Compliance Maps**
 - ✓ **Field-Verified Wetland Delineation Maps**

◆ GIS Support for Impact Assessments

- Integrated **soil, rainfall, vegetation, and biodiversity** datasets with national layers (e.g., NFEPA, Aquatic CBAs, ESA zones) to support:
 - ✓ Wetland Impact Assessments
 - ✓ Agricultural Impact Assessments (AIA)
 - ✓ Biodiversity screening and risk mapping

◆ Field Data Management & GPS Verification

- Accompanied environmental specialists on site visits to:
 - ✓ Capture **wetland and watercourse coordinates**
 - ✓ Assist with **transect layout and data recording**
 - ✓ Cross-check digital boundary outputs against **ground conditions**

◆ Reporting and Compliance Visuals

- Prepared high-resolution map figures used in:
 - ✓ **Basic Assessment Reports (BARs)**
 - ✓ **Environmental Management Programmes (EMPrs)**
 - ✓ **Water Use Licence Applications (WULAs)**
- Ensured maps met **legislative and formatting standards** for submission to DMRE, DWS, and DFFE.

Professional Strengths:

- Detail-oriented and deadline-driven
- Strong spatial logic and environmental understanding
- Collaborative work ethic with specialists and field teams
- Effective communication of spatial data to technical and non-technical audiences

Summary Value to Projects:

Ms. Jeniffer GIS and mapping expertise plays an essential role in ensuring that environmental reports are **visually informative, spatially accurate, and legally aligned**. His ability to translate field data into structured spatial products enhances the defensibility and scientific integrity of environmental applications, especially those involving **wetland delineation, regulated activity compliance, and site sensitivity verification**.