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SITE SENSITIVITY VERIFICATION REPORT FOR REZONING AND SUBDIVISION OF ERF 3927 TO RESIDENTIAL ERVEN, STILL BAY WEST

On 20 March 2020 the Minister of Forestry, Fisheries and the Environmental published the general requirements for undertaking site sensitivity verification for environmental themes for activities requiring environmental authorisation (Government Gazette No. 43110). In terms of these requirements, prior to commencing with a specialist assessment, the current land use and environmental sensitivity of the site under consideration by the screening tool must be confirmed by undertaking a site sensitivity verification.

The report uses national datasets to identify site sensitivities and potential specialist studies that may be required for any particular development. Since the datasets are not necessarily ground truthed, there may be instances where the required specialist study is in actual fact not necessary.

Prior to commencing with a specialist assessment, the current use of the land and the environmental sensitivity of the site under consideration identified by the screening tool must be confirmed by the undertaking a **site sensitivity verification**. According to the Assessment Protocol for specialist involvement, If any part of the proposed development falls within an area of "high" or "very high" sensitivity, the requirements prescribed for such sensitivity must be followed.

The applicant is proposing the rezoning and subdivision of Erf 3927, Still Bay West into 12 residential erven. The Erf is currently zoned as Open Space II (Private Open Space) and was set aside as such as part of the existing Patrys Residential Development. According to the planner, Mr Deon Nel, when the existing Patrys development was laid out, the developers made an agreement with the owner of the neighbour Erf 2763 to the east to zone Erf 3927 Open Space II to provide a buffer between the properties. Erf 2763 has subsequently been sold and the new owner is proposing their own development and apparently does not require Erf 3927 to retain its buffer status. The zoning was thus never for any conservation or protection needs. The new owner of Erf 2763 will be requested to provide comment on this application.

According to the Screening Tool Report that was run on **4 May 2021**, the following summary of the development footprint environmental sensitivities is identified. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

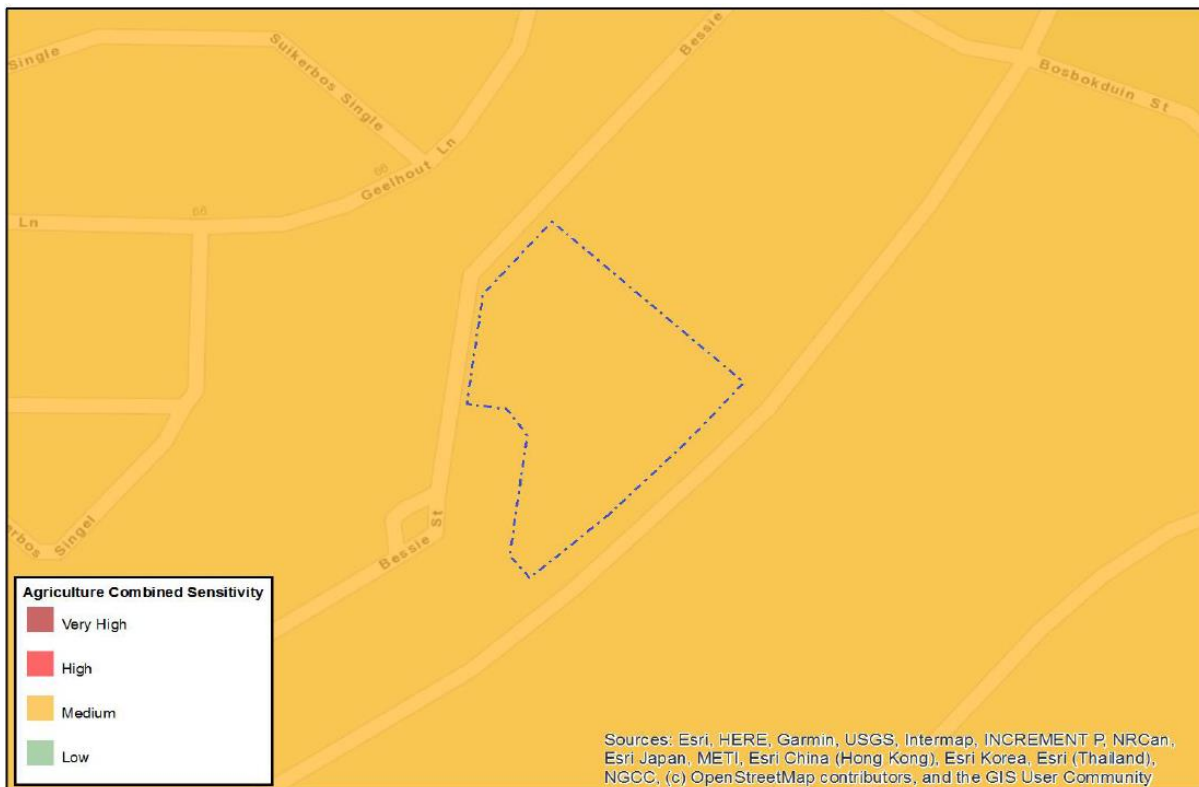
Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme			X	
Animal Species Theme		X		

Aquatic Biodiversity Theme				X
Archaeological and Cultural Heritage Theme	X			
Civil Aviation Theme		X		
Defence Theme				X
Paleontology Theme			X	
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

Below is confirmation of the studies required for the Bosbokduin Residential Estate based on the sensitivity themes identified above.

Agriculture (Medium Sensitivity)

The Screening Tool identifies the agricultural sensitivity as Medium using the estimated land capability dataset that is associated with this site. The property is not zoned for Agriculture, has not ever been used for agriculture, is an erf in terms of the municipal scheme and is inside the urban edge of Still Bay West. In addition, the areas around the property which are also identified as having medium agricultural sensitivity are already built up and **not consistent** with agricultural activities.



There is no evidence on site of agricultural activities currently and there is no intention to practise any agricultural activities. There is no likelihood of **high value agricultural land** being preserved for **continued agricultural production** thus ensuring long term national food security. This property does not qualify in as per the requirements of the national Department of Agriculture, see definition below.

Layer Information

Title
Land Capability (DAFF 2016)

Description
The Land Capability (2016) represents the distribution of the land capability evaluation values in the country, used as one of the input data layers to determine and demarcate all high value agricultural land for ensuring

that these areas, pending availability, are preserved for continued agricultural production, thereby ensuring long-term national food security. The data layer is a seamless data layer and does not exclude permanently transformed areas (built up; waterbodies; mining etc.)

Land capability is defined as the most intensive long-term use of land for purposes of rainfed farming determined by the interaction of climate, soil and terrain. Land capability should not be seen as a substitute for the interpretation designed to show land suitability or agricultural potential.

The approach to the refinement of the 2016 Land capability data layer was based on a spatial modelling exercise and verified through actual in-field verification processes and local level soil assessment data.

The Land capability evaluation 2016 data layer is a refined and updated spatial modelled data layer depicting the land capability evaluation values for the country. The main contributing factors towards land capability in a “natural or unimproved “rainfed (dryland) scenario, were the soil, climate and terrain capabilities with a weighted reference of:

Soil capability = 30%; Climate capability = (40%) and Terrain capability = (30%).

Source

Department of Agriculture, Forestry and Fisheries (DAFF)

Type

Raster Layer

In terms of agriculture, as there is no likelihood of practising agricultural activities and the applicant intends on developing the site for residential use inside the urban edge, the sensitivity of this layer is deemed to be negligible.

No Agriculture studies are being considered. The Western Cape Department of Agriculture will be included as an I&AP for comment.

Animal Species (High Sensitivity)

The screening tool identified the sensitivity for animal species (fauna) as “high” for the following species:

Sensitivity	Feature(s)
High	Aves-Bradypterus sylvaticus
High	Aves-Neotis denhami
High	Aves-Circus maurus
Medium	Insecta-Lepidochrysops littoralis
Medium	Invertebrate-Aneuryphymus montanus
Medium	Insecta-Chrysoritis brooksi tearei
Medium	Insecta-Thestor claassensi
Medium	Insecta-Aloeides thyra orientis
Medium	Aves-Circus ranivorus

A specialist has undertaken a Compliance Statement in response to this theme which will be included with the Basic Assessment Report.

Aquatic Biodiversity (Low Sensitivity)

The screening tool identified the aquatic biodiversity theme as "low". This has been confirmed by means of the desktop NFEPA investigation and the EAP confirming that there is no evidence of any wetlands or watercourses visible on the site. In addition, the Botanical Specialist did not find any plant species that could be considered aquatic species. Thus the sensitivity of the site with regard to aquatic features is null and no specialist studies are deemed applicable.

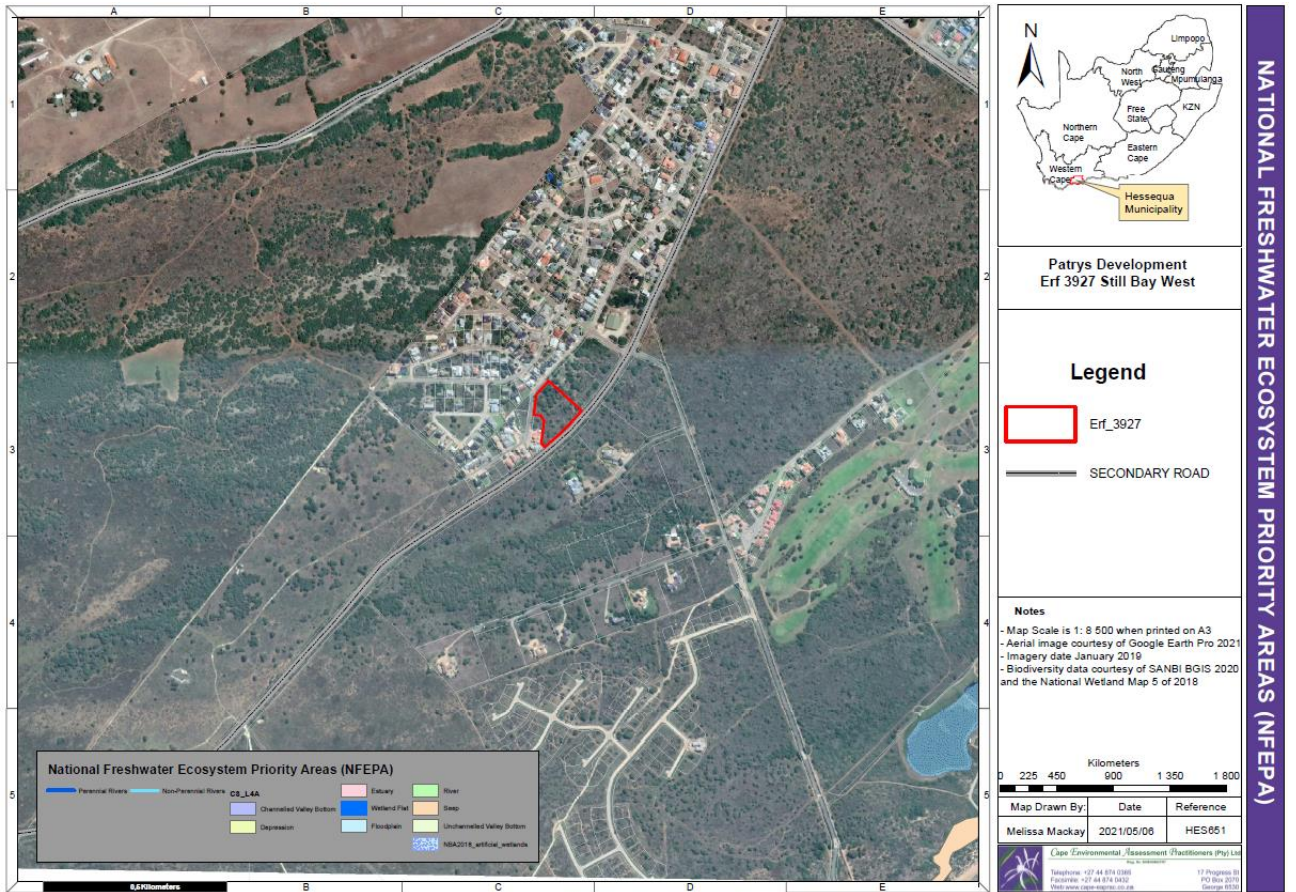




Figure 1: Site Photos (Chepri, 2021)

The Breede Gouritz Catchment Management Agency (BGCMA) will be included as a stakeholder for comment.

Archaeological & Cultural Heritage (Very High Sensitivity)

The screening tool identified this them as being "very high". The reasons provide are as follows:

Sensitivity	Feature(s)
Very High	Within 5km of a Grade I Heritage site
Very High	Within 2km of a Grade II Heritage site

A Heritage Notice of Intent has been submitted to Heritage Western Cape (HWC). According to the response from HWC a Heritage Impact Assessment (HIA) must be undertaken and must include a desktop Palaeontological study and an Archaeological Impact Assessment (AIA). These studies have been commissioned and will be included in the BAR.

Civil Aviation (High Sensitivity)

According to the screening tool, the development is located within 8 km of other civil aviation aerodrome and within dangerous and restricted airspace. The airfield in question is the Still Bay Airfield which is a small municipal airfield located approximately 4kms to the east on a heading of 31.83 degrees. The airfield is unregistered with CAA due its size and low traffic volume.

The airspace is mapped as Restricted, not dangerous by ATNS with the following citation: FAR147 : OVERBERG GND - FL195. The Restricted rating is associated with the Overberg military range and a Flight Level of 195m.

The development is proposing 12 residential erven within the urban edge of Still Bay West. It does not trigger the obstacle collision / potential hazard requirements as set out by the CAA, i.e.

- Buildings or other objects which will constitute an obstruction or potential hazard to aircraft moving in the navigable air space in the vicinity of an aerodrome, or navigation aid, or which will adversely affect the performance of the radio navigation or instrument lading systems,
- There are no buildings or objects higher than 45 metres above the mean level of the landing area;
- No building, structure or object which projects above a slope of 1 in 20 and which is within 3000 metres measured from the nearest point on the boundary of an aerodrome;
- No building, structure or other object which will project above the approach, transitional or horizontal surfaces of an aerodrome.

As such it is not necessary to request approval in terms of the Civil Aviation Act for obstacles, however comment will be requested from the Civil Aviation Authority.

The evidence collected for this theme does not support the High Sensitivity rating and it is considered to be null.

Defence (Low Sensitivity)

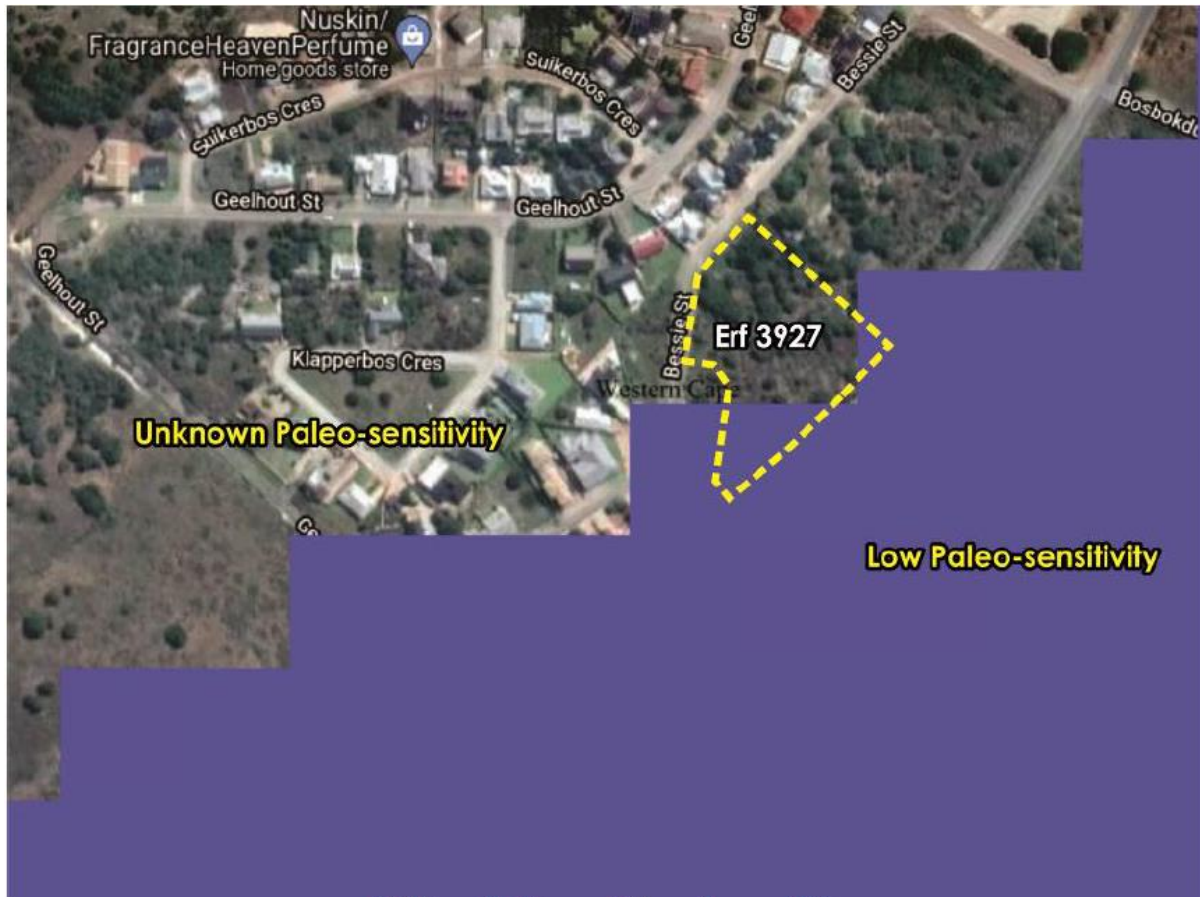
The screening tool identified this them as being "low". No further studies will be undertaken as the development constitutes residential erven inside an urban edge.

Palaeontology (Medium Sensitivity)

The screening tool identified this them as being "medium" for the following reasons:

Sensitivity	Feature(s)
Low	Features with a Low paleontological sensitivity
Medium	Features with a Medium paleontological sensitivity

A Heritage Notice of Intent has been submitted to Heritage Western Cape (HWC). According to the SAHRIS Paleosensitivity mapping, the largest (northern) portion of the study area property is marked as Clear or of "Unknown" paleosensitivity thus requiring "a minimum of a desktop study". The southernmost section of the study area is marked Blue and noted as of "Low" paleosensitivity where "no palaeontological studies are required though a protocol for potential finds must be put in place.



According to the response from HWC a Heritage Impact Assessment (HIA) must be undertaken and must include a desktop Palaeontological study and an Archaeological Impact Assessment (AIA). These studies have been commissioned and will be included in the BAR.

Plant Species (Medium Sensitivity)

The screening tool identified this them as being "medium". A Botanical Compliance Statement which includes the identification and consideration of the impact of the development on the site has been undertaken. The report will be included with the Basic Assessment Report.

Terrestrial Biodiversity (Very High Sensitivity)

The screening tool identified this them as being "very high", notably for being in a Vulnerable Ecosystem. It must be noted that in 2018 the vegetation types were reassessed and categorised by SANBI, and this area was previously considered to form part of Albertinia Sand Fynbos which is listed as a Vulnerable ecosystem. The confirmed change in ecosystem by SANBI to Hartenbos Dune Thicket with a Least Concern status thus means this information is incorrect and outdated.

A Terrestrial Biodiversity Compliance Statement has been drafted and will be included with the Basic Assessment Report.

Specialist Assessments

According to the DEA&DP series of guidelines for the involvement of specialists in EIA processes (2005), one of the underpinning generic principles is to **eliminate the unnecessary specialist involvement** through proactive project planning and design to avoid or sufficiently reduce negative impacts. Another is to **maximise the use of existing relevant information** prior to involving a specialist. This includes the input from the EAP in the form of site photographs and site inspections. These

principles apply to the specialist studies that have been identified in the screening tool and motivated as not necessary in this report.

Based on the site sensitivities identified, the screening tool identified 9 possible specialist assessments for the development. According to the site sensitivities, only 4 of the studies are being proposed.

The identified specialist assessments are as follows:

1. Landscape/Visual Impact Assessment

The property is inside the urban edge of Still Bay West, is surrounded by residential development and is proposing 12 single residential erven. All building plans must comply with the relevant municipal requirements and processes for construction. This theme does not require a specialist input.

According to the issue categories for visual impacts (DEA&DP, 2005), minimal visual impact is expected:

- Potentially low level of intrusion on landscapes or scenic resources;
- Limited change in the visual character of the area;
- Low-key development, similar in nature to existing development.

Additional landscape / visual impact assessment is thus unnecessary and will not be undertaken.

2. Archaeological and Cultural Heritage Impact Assessment

As stated previously in this report, a Heritage NID has been submitted to the HWC and the additional specialist studies are being undertaken.

3. Palaeontology Impact Assessment

As above.

4. Terrestrial Biodiversity Impact Assessment

A Terrestrial Biodiversity Compliance Statement has been undertaken and will be included with the Basic Assessment Report.

5. Aquatic Biodiversity Impact Assessment

There is no evidence of any aquatic resources on the site and the sensitivity is considered to be **null**. Therefore no Aquatic Assessment is being proposed.

6. Hydrology Assessment

There is no evidence of any aquatic resources on the site and the sensitivity is considered to be null. Therefore no Hydrology Assessment is being proposed. Stormwater management is included as part of the site engineering services reports.

According to the 2005 DEA&DP Guidelines, the following triggers must be used to determine if a specialist assessment is required:

- Where effluent or chemicals with the potential to change groundwater quality is handled as part of the project, or discharged into the environment due to the project.
- The volume of groundwater in storage or entering groundwater storage is changed beyond what is allowed by the DWAF General Authorisations.
- The groundwater flow regime is changed.

The Guidelines further state: Where none of the listed conditions exist or are likely to exist, there is no need for a specialist, unless special circumstances exist at the site in question.

The development will not trigger the listed conditions above and as such no Hydrology assessment is necessary.

7. Socio-Economic Assessment

The applicant is proposing 12 residential erven inside the urban edge of Still Bay West, within a developed residential area. It is not in conflict with the strategic planning for Still Bay. A Socio-Economic Assessment is not being proposed for this development.

According to the indicators associated with the nature of the receiving environment and the project as provided in the DEA&DP Guideline for Involving Economists in EIA Process (2005), this development does not trigger the need for a Socio Economic Assessment.

8. Plant Species Assessment

A Botanical Compliance Statement was undertaken and will be included with the Basic Assessment Report.

9. Animal Species Assessment

An Animal Species Compliance Statement was undertaken and will be included with the Basic Assessment Report.

The site verification per theme as provided above motivates that only the following assessments will be undertaken:

1. Heritage which includes motivation for Archaeological and Palaeontological sensitivities.
2. Terrestrial Biodiversity Impact Assessment
3. Plant Species (Botanical) Assessment
4. Faunal Compliance Statement

Please feel free to contact this office should you require any further information.

Kind regards,



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EAPASA Registration 2019/1446