



02 August 2022

Our Ref: HES718/03

SITE SENSITIVITY VERIFICATION REPORT FOR PORTION 1 PORTION 1 OF DUINEKROON 591 STILBAAI (Version 2)

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.

According to the Screening Tool Report that was re-run on **2 August 2022** (initial version submitted with Nol dated 2 December 2021)¹, 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		

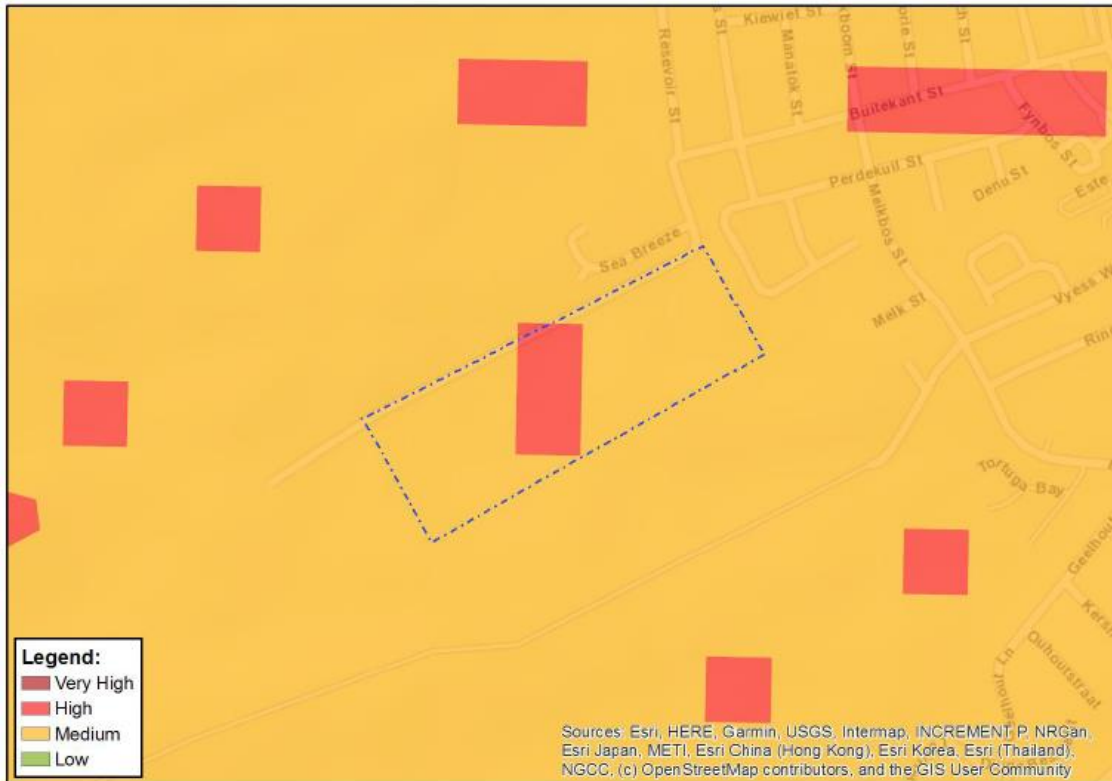
Aquatic Biodiversity Theme				X
Archaeological and Cultural Heritage Theme	X			
Civil Aviation Theme		X		
Defence Theme				X
Paleontology Theme			X	
Plant Species Theme			X	
Terrestrial Biodiversity Theme				X

¹ There is no difference between the first and second version of the Screening Tool.

Below is confirmation of the studies required for the Duinekroon development based on the sensitivity themes identified above.

Agriculture (High Sensitivity)

The Screening Tool identifies the agricultural sensitivity as High. The property is zoned for Agriculture, and grazing of animals continues on the property. However it is not subject to Act 70 of 70 as the property is earmarked for urban expansion and previous development authorisations have been issued for this property in 2014 which only lapsed in 2019. Department of Agriculture will be consulted.



There is no likelihood of **high value agricultural land** being preserved for **continued agricultural production** given the spatial planning for the area. 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 sustainable agricultural activities with no agricultural resources and the applicant intends on developing the site for residential use inside the urban edge, the sensitivity of this layer is deemed to be **low-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-Circus maurus
High	Aves-Neotis denhami
High	Aves-Bradypterus sylvaticus
Medium	Invertebrate-Aneuryphymus montanus
Medium	Aves-Circus ranivorus
Medium	Insecta-Aloeides thyra orientis
Medium	Insecta-Chrysothrix brooksi tearei
Medium	Insecta-Lepidochrysops littoralis
Medium	Insecta-Thestor claassensi
Medium	Mammalia-Acinonyx jubatus

The botanical site sensitivity (medium) and biodiversity site sensitivity (low) indicate a low species diversity for the site. The species of importance being restricted to insects (butterflies) mostly.

Dr Dave Edge (butterflies) conducted a site assessment and confirmed that the site is not suitable for the presence of butterflies.

Dr David Hoare conducted a site assessment and confirmed that the site sensitivity is in fact LOW.

A Faunal Compliance Statement will suffice.

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 visible evidence or indicators of any wetlands or watercourses on the site. Thus the sensitivity of the site with regard to aquatic features is low to insignificant and we submit that no detailed specialist studies are deemed applicable.

It is submitted that there is no justifiable reason for conducting an aquatic specialist studies in the absence of aquatic features on or in proximity to the site. **This theme is not deemed applicable.**



DUINEKROON LIFESTYLE VILLAGE

Legend
Wetlands (NFEPA)
Natural

Map Center: Lon: 21°24'1"E
Lat: 34°22'30.5"S
Scale: 1:9 028
Date created: February 7, 2022



Figure 1: Site Photos

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

The EAP obtained a copy of the 2014 approval granted by Heritage Western Cape (HWC) for the development of Portion 1 Farm Duinekroon 591. Heritage Western Cape was consulted and they affirmed that their decision remains valid.

No further studies or assessments are required for Archaeology, Palaeontology or Heritage.

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.

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 ±165 residential erven within the urban edge of Still Bay. 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 **not applicable**.

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 and there are no military basis or areas of military significance in the Stilbaai area.

This theme is deemed to **not be applicable**.

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

The EAP obtained a copy of the 2014 approval granted by Heritage Western Cape (HWC) for the development of Portion 1 Farm Duinekroon 591. Heritage Western Cape was consulted and they affirmed that their decision remains valid.

No further studies or assessments are required for Archaeology, Palaeontology or Heritage.

Plant Species (Medium Sensitivity)

The screening tool identified this them as being “medium”. It is submitted that the site is transformed through historical agricultural activities and grazing continues on the property. Species diversity is deemed to be very low due to the continued land use.

Dr David Hoare conducted a site inspection and confirmed site sensitivity to be low.

A Compliance Statement will suffice.

Terrestrial Biodiversity (Low)

The screening tool identified this them as being “low”, notably for being in a Least Concerned Ecosystem, not being part of a Critical Biodiversity or Environmental Support Area and not having any aquatic features on the property.

Botanical diversity is low and faunal presence similar mostly because of restricted presence of food plants or food sources.

Dr David Hoare conducted a site inspection and affirmed the site sensitivity to be low.

A Compliance Statement will suffice.

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 sensitives identified, the screening tool identified 9 possible specialist assessments for the development. According to the site sensitivities, only 5 of the studies are being proposed.

The identified specialist assessments are as follows:

1. Landscape/Visual Impact Assessment

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 unnecessary and will not be undertaken.

2. Archaeological and Cultural Heritage Impact Assessment

HWC confirmed that no further assessment/applications are required.

3. Palaeontology Impact Assessment

4. HWC confirmed that no further assessment/applications are required.

5. Terrestrial Biodiversity Impact Assessment

A Terrestrial Biodiversity Compliance Statement is required according to the Screening Tool. The specialist confirmed the same.

6. Aquatic Biodiversity Impact Assessment

No Aquatic Assessment is being proposed as the theme is not deemed applicable.

7. Hydrology Assessment

There is no evidence of any aquatic resources on the site and the sensitivity is considered to be null. This theme is deemed to be not applicable. Stormwater Management is addressed in the civil engineering report. No study is required.

8. Socio-Economic Assessment

A Socio-Economic Assessment study is not deemed necessary for a development that is considered to be in line with the spatial development framework for the area. Nor is such a study required for a development proposal that is in line with the surrounding township developments as it will be similar in character and form.

No further studies are required in this discipline.

9. Plant Species Assessment

A Botanical Impact Assessment is required according to the Screening Tool. The specialist confirmed the sensitivity to be low. A Compliance Statement will suffice.

10. Animal Species Assessment

A Faunal Impact Assessment is required according to the Screening Tool. The specialist confirmed the sensitivity to be low. A Compliance Statement will suffice.

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

1. Terrestrial Biodiversity Compliance Statement
2. Plant Species (Botanical) Compliance Statement
3. Faunal Compliance Statement

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

Kind regards,



Louise-Mari VanZyl