

SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED DEVELOPMENT FOOTPRINT ENVIRONMENTAL SENSITIVITY

EIA Reference number: 16/3/3/6/7/1/D1/14/0027/21

Project name: Housing Development on Erf 66 & 67 of Farm 443 Plettenberg Bay

Project title: 9 Residential Units with some designated Open Space

Date screening report generated: 24/10/2022 12:04:03

Applicant: ATHINA DEVELOPMENT (PTY) LTD

Compiler: Eco Route

Compiler signature:



Application Category: Infrastructure | Localised infrastructure | Infrastructure in the
Sea_Estuary_Littoral Active Zone_Development Setback_100M Inland or coastal public property



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Proposed Project Location

Orientation map 1: General location

**General Orientation: Housing Development on Erf 66 & 67 of Farm 443
Plettenberg Bay**



Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:

No	Farm Name	Farm/ Erf No	Portion	Latitude	Longitude	Property Type
1	BRAKKLOOF	443	0	34°5'24.04S	23°22'12.56E	Farm
2	BRAKKLOOF	443	66	34°5'24.66S	23°22'13.22E	Farm Portion
3	BRAKKLOOF	443	67	34°5'22.81S	23°22'12.5E	Farm Portion

Development footprint¹ vertices:

Footprint	Latitude	Longitude
1	34°5'24.6S	23°22'16.7E
1	34°5'26.62S	23°22'10.36E
1	34°5'23.64S	23°22'9.12E
1	34°5'21.5S	23°22'15.61E
1	34°5'24.6S	23°22'16.7E

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area

No nearby wind or solar developments found.

¹ "development footprint", means the area within the site on which the development will take place and includes all ancillary developments for example roads, power lines, boundary walls, paving etc. which require vegetation clearance or which will be disturbed and for which the application has been submitted.

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

Environmental screening results and assessment outcomes

The following sections contain a summary of any development incentives, restrictions, exclusions or prohibitions that apply to the proposed development footprint as well as the most environmental sensitive features on the footprint based on the footprint sensitivity screening results for the application classification that was selected. The application classification selected for this report is:

Infrastructure | Localised infrastructure | Infrastructure in the Sea_Estuary_Littoral Active Zone_Development Setback_100M Inland or coastal public property.

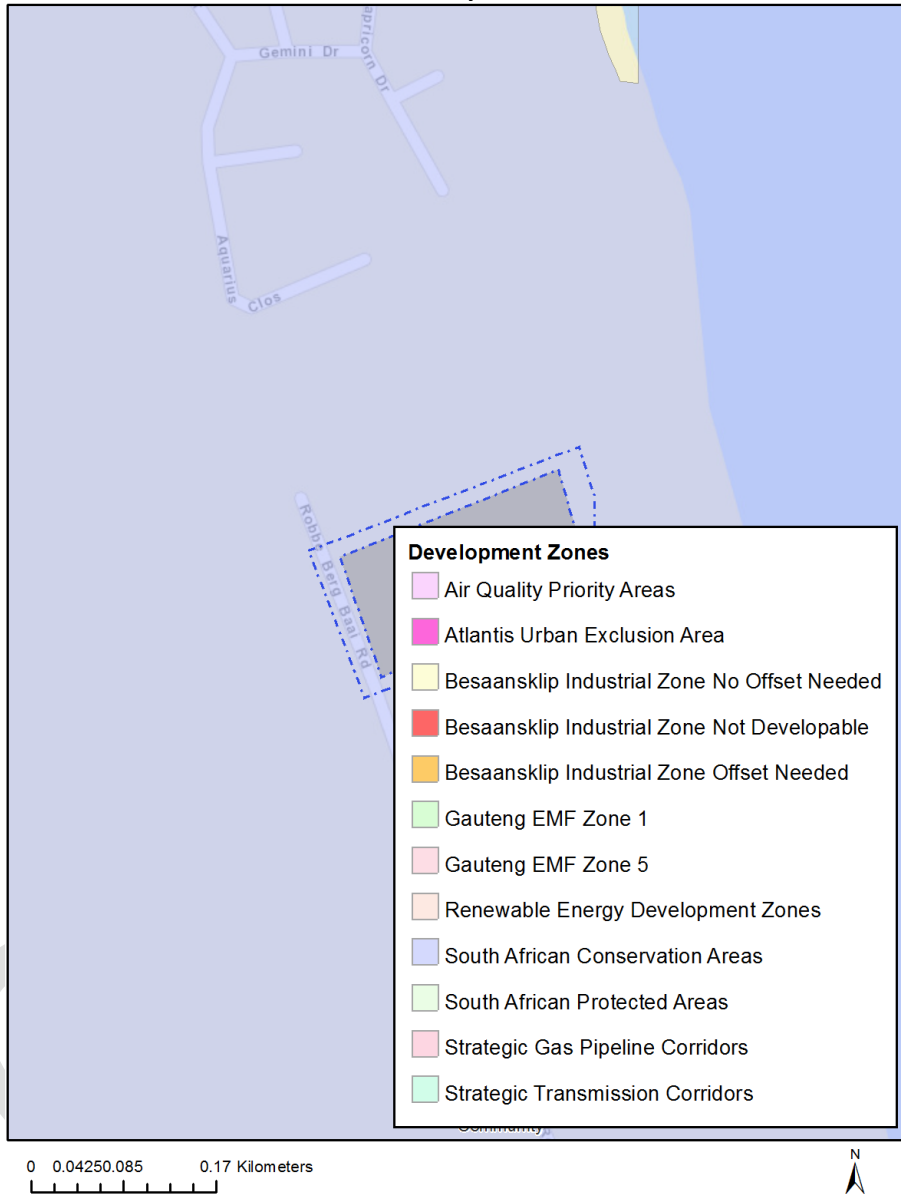
Relevant development incentives, restrictions, exclusions or prohibitions

The following development incentives, restrictions, exclusions or prohibitions and their implications that apply to this footprint are indicated below.

Incentive, restriction or prohibition	Implication
South African Conservation Areas	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/SACAD_OR_2022_Q2_Metadata.pdf

Map indicating proposed development footprint within applicable development incentive, restriction, exclusion or prohibition zones

Project Location: Housing Development on Erf 66 & 67 of Farm 443 Plettenberg Bay



Proposed Development Area Environmental Sensitivity

The following summary of the development footprint environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. 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
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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			

Specialist assessments identified

Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the footprint situation.

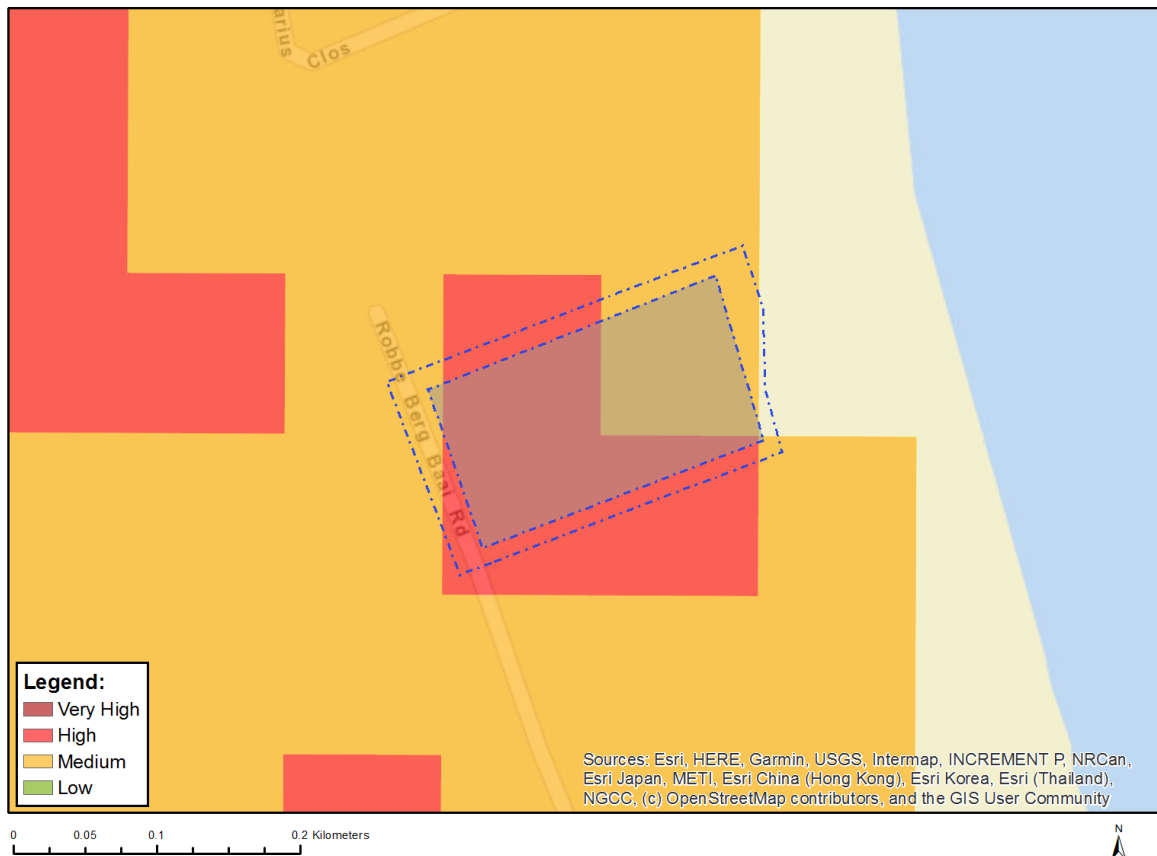
N o	Special ist assess ment	Assessment Protocol
1	Landscape/Visual Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
2	Archaeological and Cultural Heritage Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
3	Palaeontology Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
4	Terrestrial Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Terrestrial_Biodiversity_Assessment_Protocols.pdf
5	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Aquatic_Biodiversity_Assessment_Protocols.pdf
6	Marine Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf

7	Avian Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Avifauna_Assessment_Protocols.pdf
8	Geotechnical Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
9	Socio-Economic Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
10	Plant Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Plant_Species_Assessment_Protocols.pdf
11	Animal Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Animal_Species_Assessment_Protocols.pdf

Results of the environmental sensitivity of the proposed area.

The following section represents the results of the screening for environmental sensitivity of the proposed footprint for relevant environmental themes associated with the project classification. It is the duty of the EAP to ensure that the environmental themes provided by the screening tool are comprehensive and complete for the project. Refer to the disclaimer.

MAP OF RELATIVE AGRICULTURE THEME SENSITIVITY

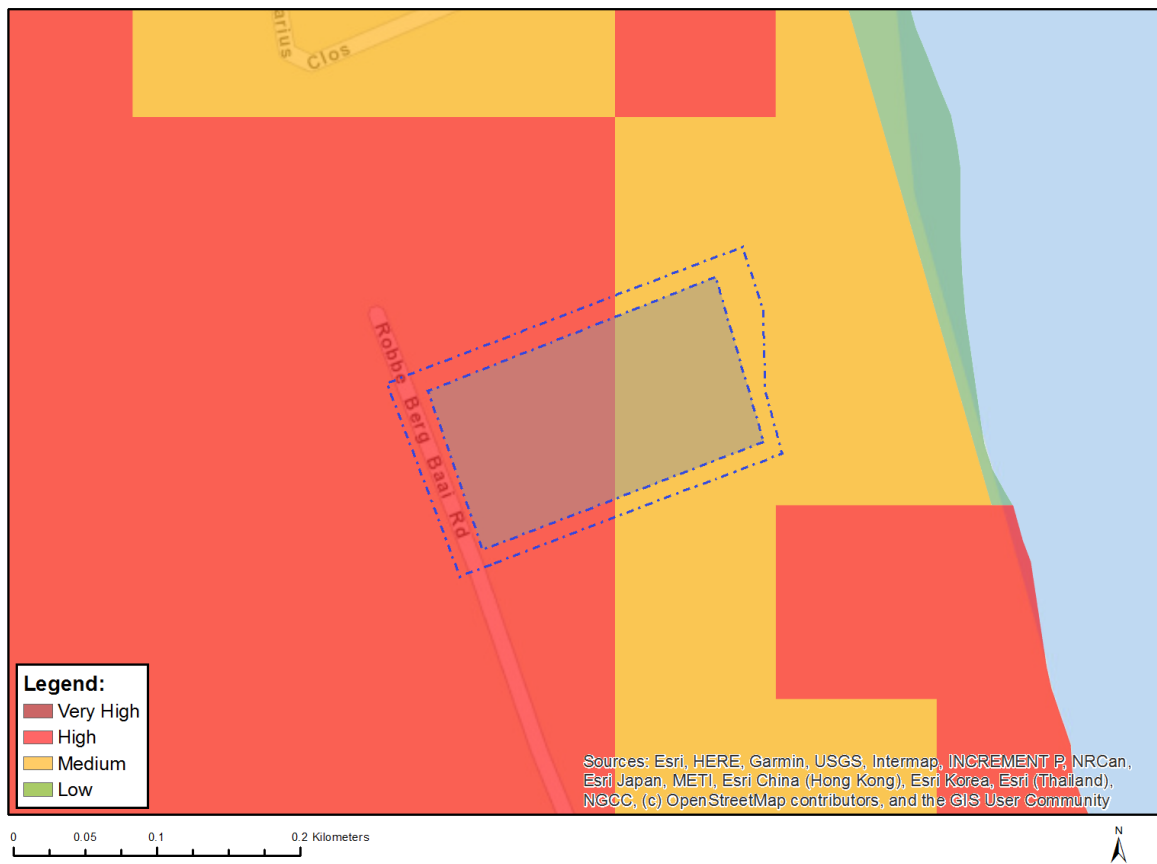


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Land capability;09. Moderate-High/10. Moderate-High
Medium	Land capability;06. Low-Moderate/07. Low-Moderate/08. Moderate

MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY



Where only a sensitive plant unique number or sensitive animal unique number is provided in the screening report and an assessment is required, the environmental assessment practitioner (EAP) or specialist is required to email SANBI at eiadatarequests@sanbi.org.za listing all sensitive species with their unique identifiers for which information is required. The name has been withheld as the species may be prone to illegal harvesting and must be protected. SANBI will release the actual species name after the details of the EAP or specialist have been documented.

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Aves-Circus ranivorus
High	Aves-Neotis denhami
Medium	Amphibia-Afrixalus knysnae
Medium	Aves-Stephanoaetus coronatus
Medium	Aves-Bradypterus sylvaticus
Medium	Insecta-Aloeides thyra orientis
Medium	Mammalia-Chlorotalpa duthieae
Medium	Sensitive species 8
Medium	Invertebrate-Aneuryphymus montanus

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Within 8 km of other civil aviation aerodrome

MAP OF RELATIVE DEFENCE THEME SENSITIVITY

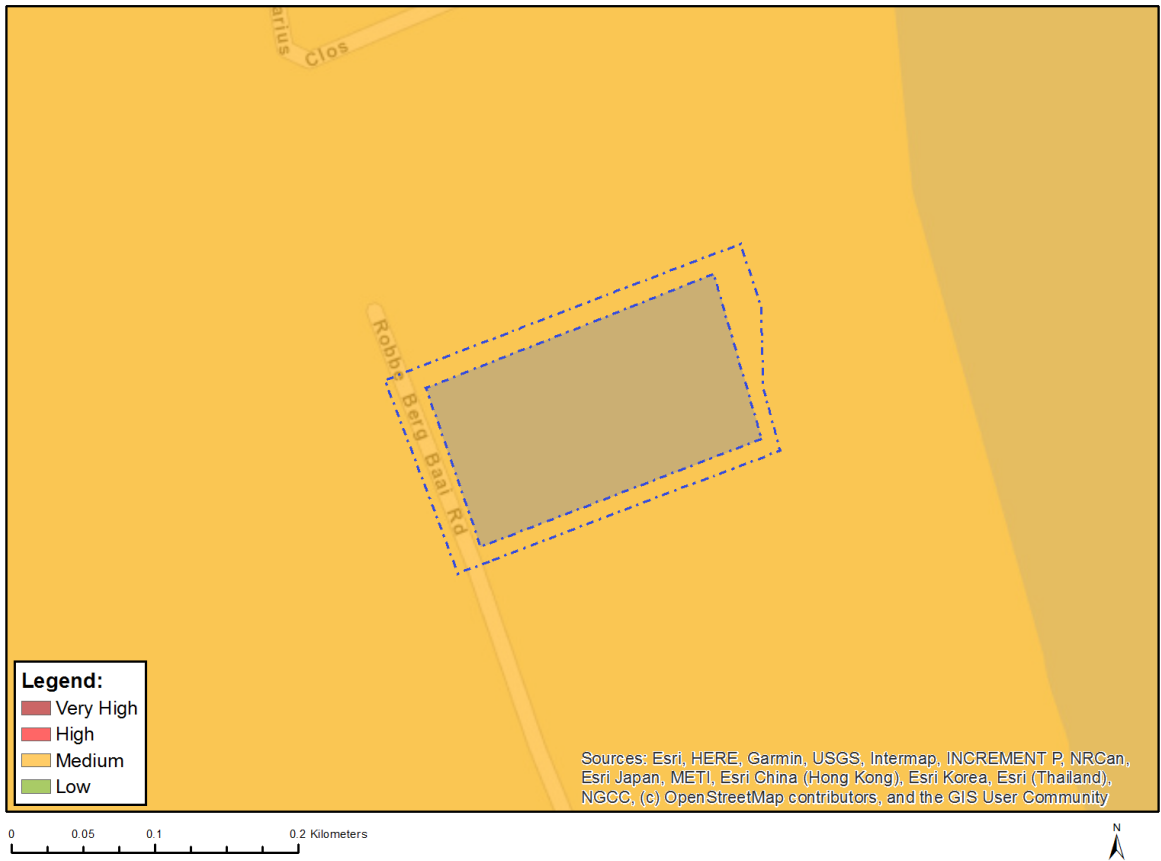


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY

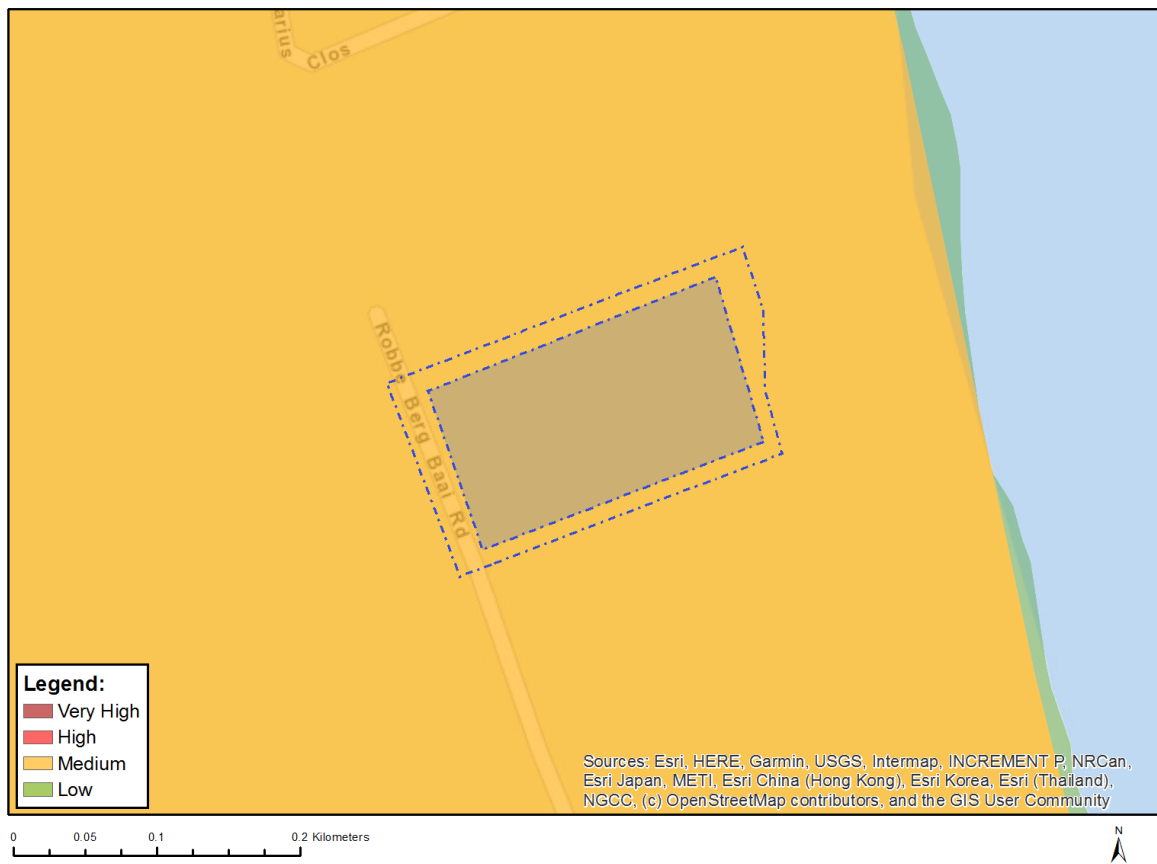


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

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

MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY



Where only a sensitive plant unique number or sensitive animal unique number is provided in the screening report and an assessment is required, the environmental assessment practitioner (EAP) or specialist is required to email SANBI at eiadatarequests@sanbi.org.za listing all sensitive species with their unique identifiers for which information is required. The name has been withheld as the species may be prone to illegal harvesting and must be protected. SANBI will release the actual species name after the details of the EAP or specialist have been documented.

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Lampranthus pauciflorus
Medium	Ruschia duthiae
Medium	Lebeckia gracilis
Medium	Sensitive species 131
Medium	Leucospermum glabrum
Medium	Selago burchellii
Medium	Erica chloroloma
Medium	Erica glandulosa subsp. fourcadei
Medium	Hermannia lavandulifolia
Medium	Sensitive species 657
Medium	Sensitive species 1032
Medium	Pterygodium newdigateae
Medium	Osteospermum pterigoideum

Medium	Acmadenia alternifolia
Medium	Muraltia knysnaensis
Medium	Sensitive species 800
Medium	Erica glumiflora
Medium	Sensitive species 500
Medium	Sensitive species 763
Medium	Pterygodium cleistogamum

MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

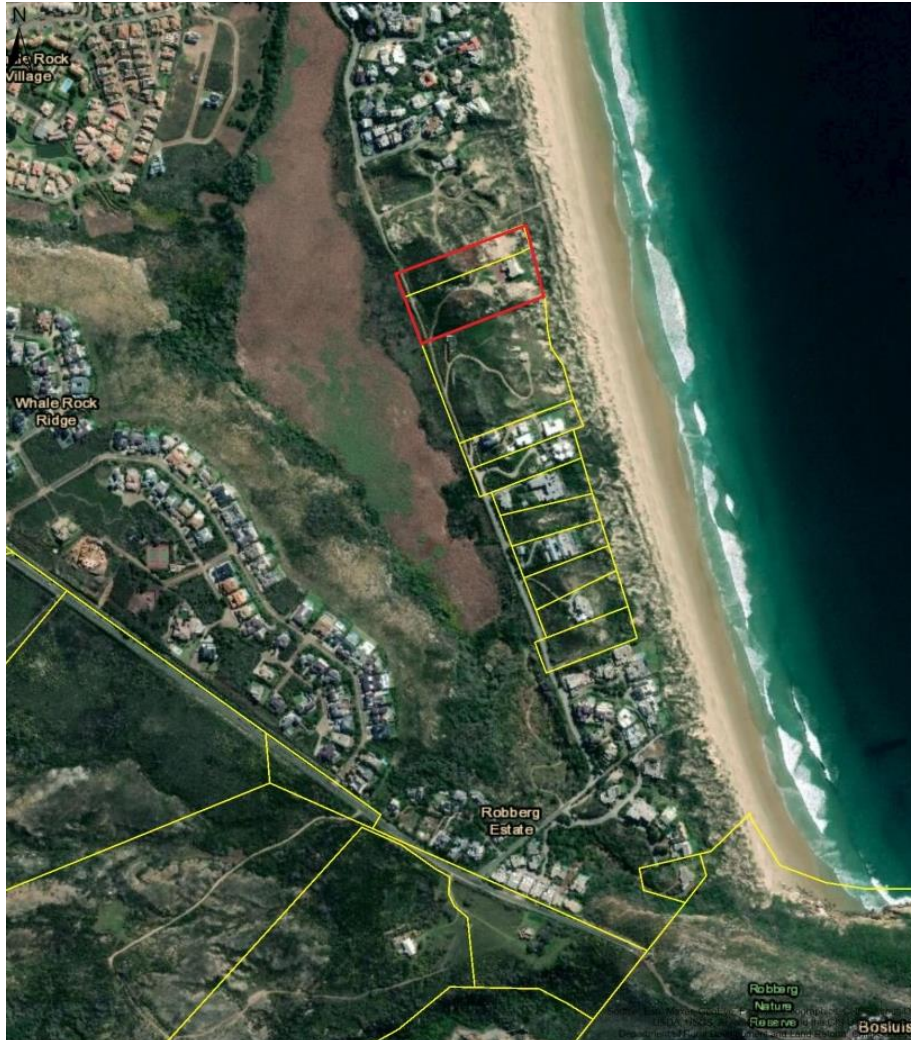
Sensitivity Features:

Sensitivity	Feature(s)
Very High	Ecological support area 1
Very High	Vulnerable ecosystem



SITE SENSITIVITY VERIFICATION REPORT

The Proposed Development of Portion 66 & 67 of Farm 443, Plettenberg Bay, Western Cape



Joclyn Marshall for Eco Route Environmental Consultancy
MSc Environmental Science
18 October 2022

Reviewed by Janet Ebersohn of Eco Route Environmental Consultancy
Bsc. Honours Environmental Management
EAPASA reg no.: 2019/1286

Review EAP Signature: _____



(1) Introduction and Terms of Reference

As required to compliment a Basic Assessment application the national web-based screening tool was used to generate an environmental screening report. The screening report lists a variety of specialist studies to be undertaken based on the data informants of the tool at the study area. This site sensitivity verification report, following ground-truthing of the site, motivates why certain specialist studies will not be required or conducted for the proposed development application.



Figure 1: Location of Erf 66 and 67 of Farm 443, Plettenberg Bay, Bitou Municipality, Western Cape.

(2) The proposed development at the property

Eco Route Environmental Consultancy were appointed by the applicants, Athina Development (Pty) Ltd, as the independent Environmental Assessment Practitioner to conduct a Basic Assessment application process for the proposed development on Portions 66 and 67 of the Farm 443, Plettenberg Bay.

A Notice of Intent (NOI) to submit an Application for Environmental Authorisation in terms of the **National Environmental Management Act (Act 107 of 1998) NEMA**. Was submitted to the



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Department of Environmental Affairs & Development Planning on 02/03/2021, the same being accepted and acknowledged on 06/08/2021.

Portion 66 (16909.97m²) and 67 (8658.85m²) of the Farm Brakkloof 443 measure ±2.56ha in total and are some of the last remaining undeveloped agricultural land parcels along the coastal strip between the Beacon Isle Hotel and the Robberg Nature Reserve. The properties have been earmarked for urban development for the past 40 years in various Structure Plans, Guide Plans, and Spatial Development Frameworks. Presently, the Spatial Development Framework for Bitou 2017, like all the preceding spatial plans, also earmarks the site as urban land within the urban edge, where residential development is encouraged.

Portion 66 was rezoned in 1989 from "Agriculture" to "Subdivisional Area" and subdivided into 11 "Single Residential" erven with average erf sizes of approximately ±1020m² and 2 open space erven. These development rights were never implemented and have lapsed. Presently, the site contains a dwelling house that appears to have been without approved building plans. The house has never been occupied and will be demolished. Portion 67 is vacant.

The proposal is to consolidate the two land portions and to create a small exclusive beachfront security estate. The proximity to the beach and the views over the bay will secure high property values as there are very few beachfront properties left in the area. The development concept includes 9 residential stands that vary between ±1319m² and ±1987m² in size. The communal open space will be rehabilitated with natural indigenous vegetation. The property will be fenced and gated, however access to the frontal / coastal beach walking trail, will not be denied. The development will be controlled by a *Homeowners Association* and the design of houses will be subject to architectural design guidelines that will ensure an aesthetically pleasing development that blends in with the surroundings.

The present zoning of the property is zoned "Agriculture" in terms of the Plettenberg Bay zoning Scheme and the intention is to apply for the rezoning of the land to "Sub-divisional Area" in the *Planning Process* which would allow for the further subdivision of the land into 9 "Single Residential" erven and 1 communal "Private Open Space" erf.

The property occurs within 100m inland from the high-water mark of the sea and thus falls within the Coastal Protection Zone. The site area is within an Ecological Support Area. Ecological Support Areas are not essential for meeting biodiversity targets but play an important role in supporting the ecological functioning of Critical Biodiversity Areas and/or in delivering ecosystem services.

The site is within an Endangered Ecosystem Threat Status. The Ecosystem Threat Status, as per the Western Cape Biodiversity Spatial Plan 2017, reflects the current threat status of ecosystems in the Western Cape Province, especially in terms of habitat loss. Ecosystems are based on the SA Vegetation Map (2012 version) and relevant indigenous forest types (DAFF, 2010), as per the national approach to assessing ecosystem threat.



(3) Environmental screening results and assessment outcomes:

The following sections contain a summary of any development incentives, restrictions, exclusions, or prohibitions that apply to the proposed development footprint as well as the most environmental sensitive features on the footprint based on the footprint sensitivity screening results for the application classifications that were selected. The application classifications selected for the screening reports are: *Infrastructure | Localised infrastructure | Infrastructure in the Sea_Estuary_Littoral Active Zone_Development Setback_100M Inland or coastal public property.*

(4) Relevant Development Incentives, Restrictions, Exclusions or Prohibitions:

The proposed site is within a South African Conservation Area (SACAD).

(5) Proposed Development Area Environmental Sensitivity:

The following summary of the development site environmental sensitivities is identified by the Screening Tool Reports. Only the highest environmental sensitivity is indicated. The 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.

Table 1: Identified Environmental Sensitivities.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture		X		
Animal Species		X		
Aquatic Biodiversity				X
Archaeological & Cultural Heritage				X
Civil Aviation		X		
Defence				X
Palaeontology			X	
Plant Species			X	
Terrestrial Biodiversity	X			



(6) Identified Specialist assessments:

Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

Table 2: Identified specialist assessments for Transformation of Land Screening Tool Report.

No:	Specialist Assessment	Assessment Protocol
1	Landscape/Visual Impact Assessment	General
2	Archaeological and Cultural Heritage Impact Assessment	General
3	Palaeontology Impact Assessment	General
4	Terrestrial Biodiversity Impact Assessment	Specialist Assessment
5	Aquatic Biodiversity Impact Assessment	Compliance Statement
6	Marine Impact Assessment	General
7	Avian Impact Assessment	General
8	Geotechnical Assessment	General
9	Socio-Economic Assessment	General
10	Plant Species Assessment	Specialist Assessment
11	Animal Species Assessment	Specialist Assessment

(7) Results of the verification of the environmental sensitivity and specialist assessments identified of the proposed area:

(7)(1) Landscape/Visual

A Visual Impact Assessment was compiled by Andre Vercueil Professional Architects, dated 15 May 2022. The assessment was completed for submission in terms of section 38(8) of the National Heritage Resource Act (Act 25 of 1999) and will form part of the Heritage Impact Assessment (HWC Case Number: 21021901SB1008E). The report will be included in the Draft BAR submission. No further studies are required.

(7)(2) Archaeological & Cultural Heritage

The screening report indicates that the receiving environment has a **Low** Relative Archaeological & Cultural Heritage Sensitivity.

A Notice of Intent (NID) application was submitted to Heritage Western Cape (HWC) which was discussed at the Heritage Officers Meeting on the 25th October 2021. A response to the NID was issued on 3 November 2021 with Case Number 21021901SB1008E, in which HWC resolved that: "since there is reason to believe that the proposed residential estate on Portions 66 & 67 of Farm 443, Plettenburg Bay will impact on heritage resources, HWC requires that a Heritage Impact Assessment



(HIA) that satisfies the provisions of section 38(3) of the NHRA be submitted. This HIA must have specific reference to the following: A palaeontological desktop study (PIA) an archaeological impact assessment (AIA) and a visual impact assessment (VIA).

An archaeological impact assessment was completed by KAPP Environmental Consultants, March 2022. A Visual Impact Assessment was undertaken by Andre Vercueil Professional Architects. The reports will be included in the Draft BAR submission.

Recommendations:

The overall findings of the AIA Report were that the proposed residential development and associated infrastructure will not result in the loss of significant heritage resources and no mitigation is proposed. - the proposed development is supported. The VIA concluded that the proposed development would have little to no visual impact significance on the cultural landscape. Therefore, no further assessments will be required.

(7)(3) Palaeontology

The screening report indicates that the receiving environment has a **Medium** Palaeontology Sensitivity.

A Notice of Intent (NID) application was submitted to Heritage Western Cape (HWC) which was discussed at the Heritage Officers Meeting on the 25th October 2021. A response to the NID was issued on 3 November 2021 with Case Number 21021901SB1008E, in which HWC resolved that: "since there is reason to believe that the proposed residential estate on Portions 66 & 67 of Farm 443, Plettenburg Bay will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of section 38(3) of the NHRA be submitted. This HIA must have specific reference to the following: A palaeontological desktop study (PIA) an archaeological impact assessment (AIA) and a visual impact assessment (VIA).

A Palaeontological Impact Assessment was completed by Rob Gess Consulting, May 2022. The report will be included in the Draft BAR submission.

Recommendations:

The overall findings of the PIA Report were that there is very little indication of strandloper activity observed, with only sparse small scatters of sand mussels being observed. No palaeontological material of any importance was observed, and no mitigation is therefore specified. The sensitivity should therefore be **Low**, and no further assessments will be required.



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(7)(4) Terrestrial Biodiversity

The screening reports indicate that the receiving environment has a **Very High** Terrestrial Biodiversity Sensitivity. The property is within an Ecological Support Area 1 (Figure 5) and a Vulnerable Ecosystem (Figure 6).



Figure 2: Critical Biodiversity Areas and Ecological Support Areas.



Figure 3: Ecosystem Threat Status (2016) indicating a Vulnerable ecosystem.

An Animal Species & Terrestrial Biodiversity Assessment Report was undertaken by Ken Coetzee (Conservation Management Services) in November 2021 and updated October 2022. A Terrestrial Plant Species Compliance Statement was undertaken by Regalis Environmental Services CC in December 2020 and updated October 2022. The reports will be included in the Draft BAR submission.

Both specialist studies (Terrestrial Fauna and Flora) identified the property as having anthropogenically impacted and fragmented habitats. The site no longer functions as an important ecological corridor or useful linkage habitat. The site is severely invaded by alien plants, mostly *Acacia cyclops*. The last remnants of natural habitat along the line of development (including the proposed development site) are currently being further degraded by a dense infestation of the alien *Acacia cyclops* which results in severely altered habitat conditions such as soil chemistry modification, altered vegetation structure and reduced opportunities for natural pollination biology. Figures 7 and 8 show the extent of alien plant infestation on the study site.



Figure 4: The area of dense Thicket, completely dominated by the alien invasive *Acacia cyclops*.



Figure 5: The access roadway to the original house.



Recommendations:

As concluded by both specialists, the study site no longer functions as an important ecological corridor or functional habitat for species of conservation concern. The habitats available on the study site are all anthropogenically impacted, to a variable degree, but the current situation is set to deteriorate swiftly due to the devastating impact of invasive alien *Acacia cyclops*, which in the last few years has spread over much of the site and which will mature to the further detriment of all indigenous plant and animal species. The currently disturbed habitats cannot be described as useful or necessary linkage habitat, and with the continued spread and maturity of the alien trees, will become even less likely to provide linkages for animal movement. The sensitivity should therefore be **Low**.

(7)(5) Aquatic Biodiversity

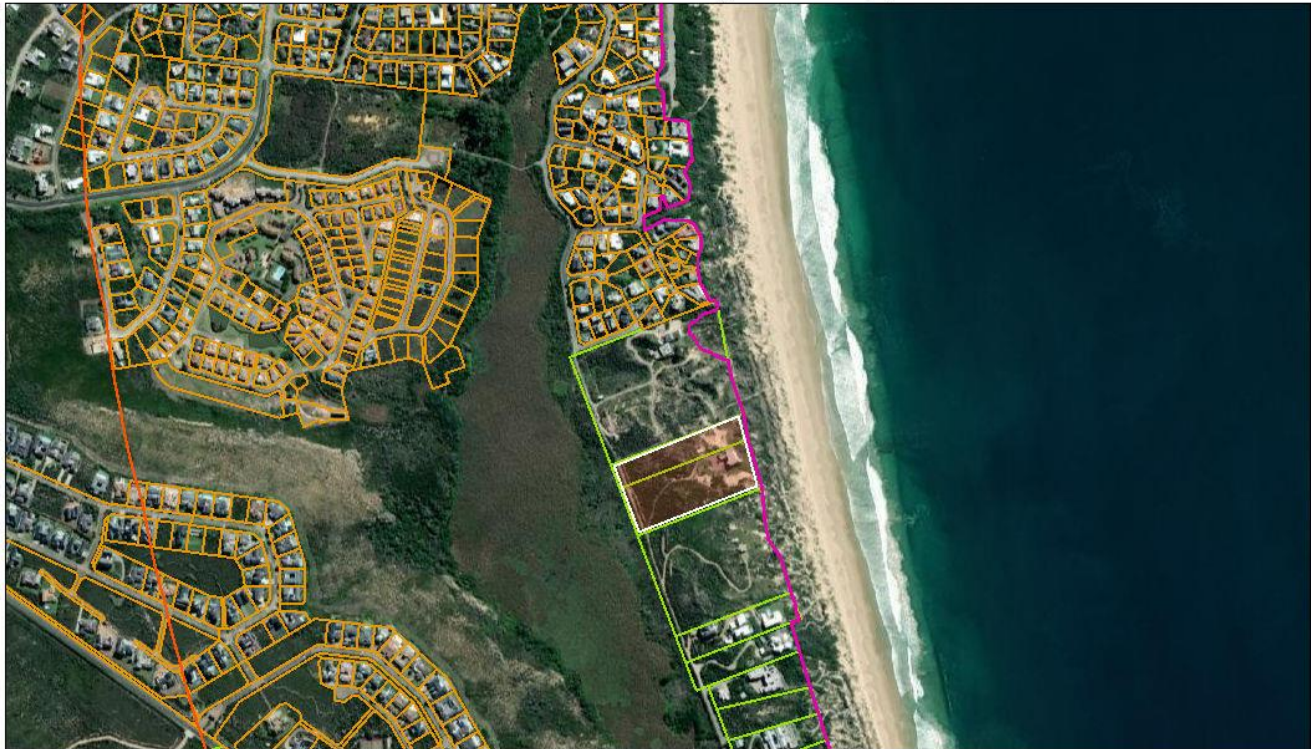
The screening reports indicate that the receiving environment has a **Low** Aquatic Biodiversity Sensitivity.

There are no wetlands or watercourses identified on the site. The development will not impact the seashore to the east of the property, or the large wetland system to the west of the property. The Robberg Beach Road traverses the western boundary of both properties and separates the site from the wetland.

The properties fall within the Coastal Management Zone, however, have been identified as Development Islands (Figure 3).

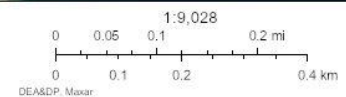


DEA&DP Coastal Management Mapp



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- Development Islands
- Coastal Protection Zone
- Coastal Management Line Protected Areas
- Coastal Management Line
- Coastal Protection Zone
- Coastal Management Line



DEA&DP

Figure 6: DEA&DP Coastal Management Lines. Development Islands boundaries in green.

Recommendations:

The development will have no impacts on aquatic biodiversity and the theme sensitivity is **Low**. An aquatic specialist assessment / compliance statement is therefore **disputed**.

(7)(6) Marine

The development falls within 100m of the high-water mark of the sea, however it is not within the seashore or littoral active zone and is buffered from the sea by a vegetated foredune (figure 7). The properties fall within the Coastal Management Zone, however, have been identified as Development Islands.



Figure 7: The relatively undisturbed foredune area.

The development will have no impact on marine therefore a marine specialist assessment is **disputed**.

(7)(7) Avian

An Animal Species & Terrestrial Biodiversity Assessment Report was undertaken by Ken Coetzee (Conservation Management Services) in November 2021 and updated October 2022 which addresses avian species. An avifaunal assessment is **disputed** as the development will not have significant impacts on bird populations and migratory patterns. Impacts on avifaunal habitats are addressed in the specialist study.



(7)(8) Geotechnical

Geotechnical aspects of the development will be addressed in the Engineering Report that is being compiled by Tuiniqua Consulting Engineers. The Engineering Report will address aspects of developing on a sandy dune area and will include the following:

- Geology and substrate of the site.
- Foundations to be used for construction.
- Stormwater drainage.
- Erosion prevention during construction.

The Engineering Report will be sufficient in addressing the important geotechnical aspects of the development. A full Geotechnical Report is therefore **disputed**. The Engineering Report will be included in the Draft BAR submission.

(7)(9) Socio-economical

The proposed development is a small exclusive beachfront security estate. The proximity to the beach and the views over the bay will secure high property values as there are very few beachfront properties left in the area. The properties have been earmarked for urban development for the past 40 years in various Structure Plans, Guide Plans, and Spatial Development Frameworks. Presently, the Spatial Development Framework for Bitou 2017, like all the preceding spatial plans, also earmarks the site as urban land within the urban edge, where residential development is encouraged. Socio-economical aspects will be discussed in the Draft BAR.

For this reason, the properties are considered as prime land for residential development and high-income area and have been earmarked specifically for residential development. A socio-economical Assessment is therefore **disputed**.

(7)(10) Plant Species

The screening reports indicate that the receiving environment has a **Medium** Relative Plant Species Sensitivity and indicated the following features for the theme in Table 5 below.

**Table 5: Plant Species Sensitivity Features:**

Sensitivity	Feature(s)
Medium	Lampranthus pauciflorus
Medium	Ruschia duthiae
Medium	Lebeckia gracilis
Medium	Sensitive species 131
Medium	Leucospermum glabrum
Medium	Selago burchellii
Medium	Erica chloroloma
Medium	Erica glandulosa subsp. fourcadei
Medium	Hermannia lavandulifolia
Medium	Sensitive species 657
Medium	Sensitive species 1032
Medium	Pterygodium newdigateae
Medium	Osteospermum pterigoideum
Medium	Acmadenia alternifolia
Medium	Muraltia knysnaensis
Medium	Sensitive species 800
Medium	Erica glumiflora
Medium	Sensitive species 500
Medium	Sensitive species 763
Medium	Pterygodium cleistogamum

The National Vegetation Map (VegMap 2018) describes the proposed development area as Goukamma Dune Thicket (status = Least Concerned) and a narrow strip of Garden Route Shale Fynbos (status = Vulnerable).

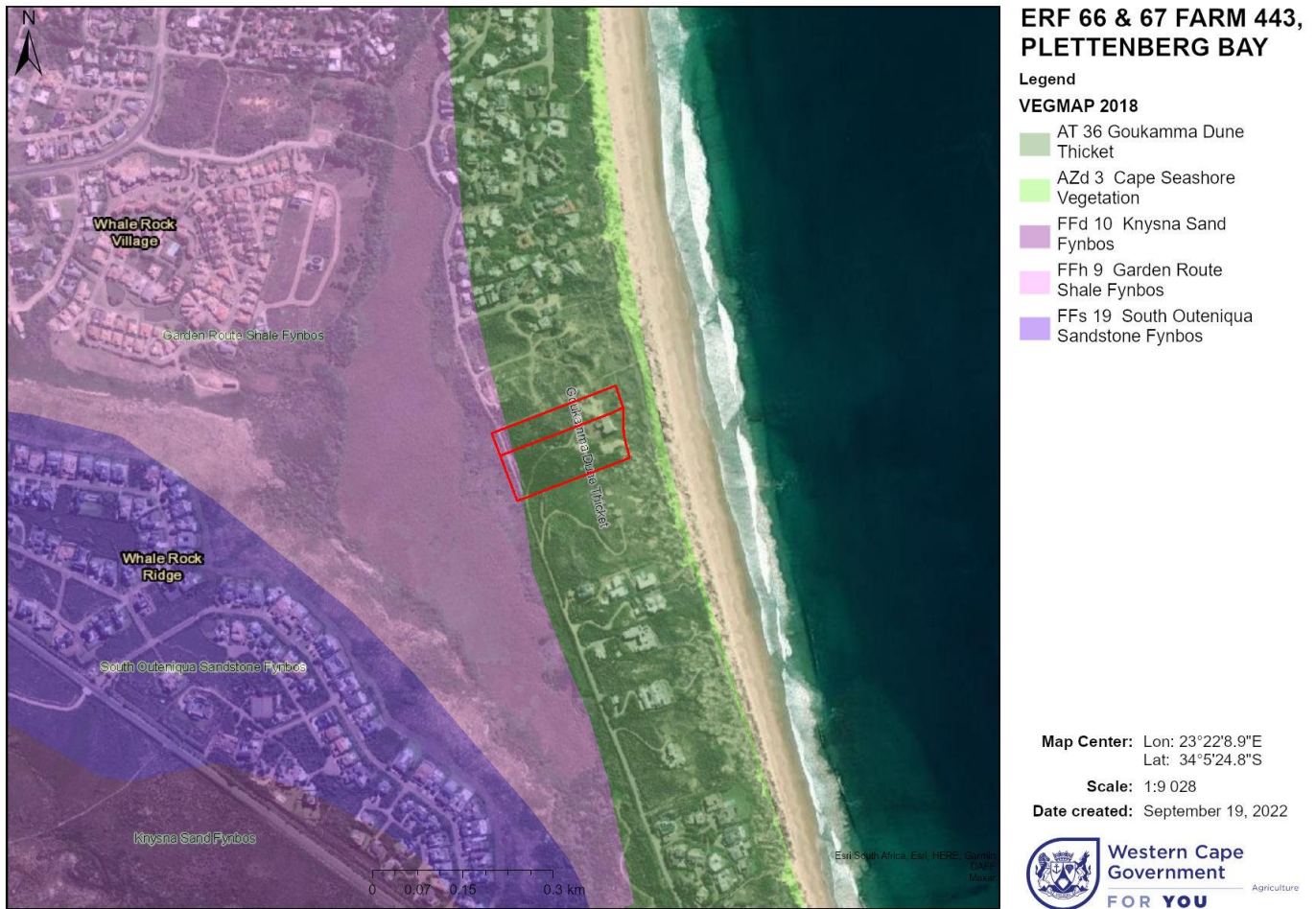


Figure 8: National VegMap 2018.

A Terrestrial Plant Species Compliance Statement was completed by Regalis Environmental Services in December 2020, and updated October 2022. According to the study, the following was concluded:

- The affected area is not very rich in indigenous plant species (52 species were found), as most of the vegetation has either been disturbed with the construction of current infrastructure and/or dense invasion by alien plants (mostly *Acacia cyclops*).
- No rare or threatened species were found (or are suspected to occur) on the properties.
- No sensitive areas were found on the properties, but the strip of vegetation between the properties and the beach consists of a very sensitive primary dune system.
- The terrestrial vegetation along the dune system east of the wetland is highly fragmented due to high density development on most of the properties. This dune system can hence no longer act as an important ecological corridor.
- There are no known ecological processes acting between the wetland west of the properties and the beach east of the properties

Recommendations:

The specialist concluded that additional development on the properties will not have a negative impact on any important ecological processes operating in the general area. It is also noted that



no rare or threatened species were found (or are suspected to occur) on the properties. The sensitivity should therefore be **Low**, and no further studies are required.

(7)(11) Animal Species

The screening reports indicate that the receiving environment has a **High** Relative Animal Species Sensitivity and indicated the following features for the theme below.

Table 3: Animal Sensitivity Features.

Sensitivity	Feature(s)
High	Aves-Circus ranivorus
High	Aves-Neotis denhami
Medium	Amphibia-Afrixalus knysnae
Medium	Aves-Stephanoaetus coronatus
Medium	Aves-Bradypterus sylvaticus
Medium	Insecta-Aloeides thyra orientis
Medium	Mammalia-Chlorotalpa duthieae
Medium	Sensitive species 8
Medium	Invertebrate-Aneuryphymus montanus

An Animal Species & Terrestrial Biodiversity Assessment Report was undertaken by Ken Coetzee (Conservation Management Services) in November 2021 and updated October 2022. None of the aforementioned species were noted on site during the Animal Species Assessment. The study site habitats do not represent any kind of critical or specialized resource for any of the sensitive animal species. The habitats available on the study site are all anthropogenically impacted, to a variable degree. The currently disturbed habitats cannot be described as useful or necessary linkage habitat, and with the continued spread and maturity of the alien trees, will become even less likely to provide linkages for animal movement. Avifauna was included in the specialist assessment.

Recommendations:

As concluded by the specialist with a high degree of confidence, the study site is of no importance to the fauna predicted by the screening tool to occur on it and that the other fauna on the site is already in an advanced state of decline due to habitat transformation. The sensitivity for animal species should therefore be **Low**.

(7)(12) Civil Aviation

The screening reports indicate that the receiving environment has a **High** Sensitivity for this theme as the proposed development property is within 8km of a civil aviation aerodrome.

The development will not exceed the height of a single-storey building.



Recommendations:

The development will not have any impact on civil aviation as it is a residential dwelling. The South African Civil Aviation Authority will be included in the I&AP Register. Comments will be included in the BAR. The sensitivity should therefore be **Low**, and no further assessments will be required.

(7)(13) Defence

The screening reports indicate that the receiving environment has a **Low** Sensitivity for this theme. As no specific protocol exists for this theme, the General Requirements Protocol is assigned to this sensitivity.

Recommendations:

The EAP confirms that the Defence Sensitivity of the proposed development property is **Low** and no further assessments will be required.

(7)(14) Agricultural Theme Sensitivity

The screening report indicates that the receiving environment has a **High** Relative Agricultural Sensitivity.

The property is currently undeveloped (except for the building to be demolished) and ±2.56ha in extent, within a built-up coastal area with surrounding residential dwellings. It is designated as "Township" in terms of the Knysna, Wilderness and Plettenberg Bay Regional Structure Plan. On 10 November 2021 a letter was received from DEA&DP (Ref: 15/4/2/3) with regards to the subdivision of agricultural land application (Annexure 1). It was confirmed by the department that the property is exempt from the provisions of the Subdivision of Agricultural Land Act, 1970 (Act 70 of 1970). Following this a letter was received from Western Cape Department of Agriculture confirming that they have no objection to the housing development (Annexure 2).

The planned development is situated on a geologically relatively recent aeolian barrier dune system, running parallel to Roberg Beach, which separates the beach from a wetland area which probably represents a former estuarine inlet¹. The area comprises of aeolian sands (Figure 2), which generally have a sandy nature and are susceptible to wind erosion. The low clay content gives rise to low water-holding capacity, factors that are not highly suitable for agriculture. The suitability of soils for the production of crops depends mainly on the properties of the soil, combined with climate and crop requirements. There is no irrigation water or rights on this property.

¹ Palaeontological Impact Assessment for redevelopment of portions 66 and 67 of Brakkloof 443, Plettenberg Bay. May 2022. Robert Gess Consulting.



Geology and Palaeontology

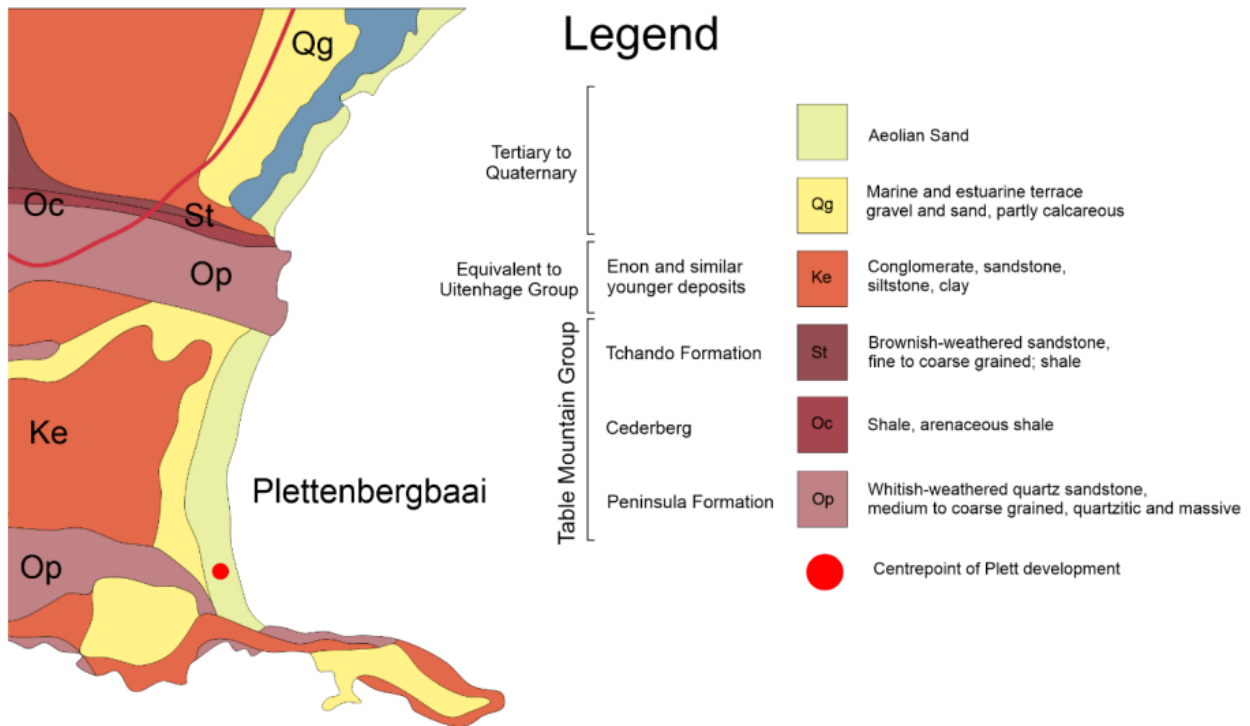


Figure 9: Geological map of the study area and surrounding areas according to geological survey by Robert Gess Consulting.

Recommendations:

The property is not suitable for agricultural activities due to soil properties, water availability, and the size of the property. The area has been designated as "Township" and is earmarked for development in terms of the various Structure Plans, Guide Plans, and Spatial Development Frameworks for the area. The Department of Agriculture has no objection to the proposed development. The sensitivity for Agricultural should therefore be **Low**, and an agricultural assessment/compliance statement is **disputed**.



Eco Route

ENVIRONMENTAL CONSULTANCY

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ANNEXURE 1: DEA&DP LETTER REGARDING AGRICULTURAL SUBDIVISION



Western Cape
Government

Department of Environmental Affairs and Development Planning

Elma Vreken

Development Management (Region 3)

Elma.Vreken@westerncape.gov.za | Tel: 044 814 2010

REFERENCE NUMBER: 15/4/2/3
ENQUIRIES: Elma Vreken
DATE OF ISSUE: 10 November 2021

VPM Town Planners

PO Box 173

KNYSNA

6570

Attention: Lizemarie Botha

Email: info@vmppsa.co.za

Dear Sir/Madam

SUBDIVISION OF AGRICULTURAL LAND ACT, 1970 (ACT 70 OF 1970): CONFIRMATION OF THE DESIGNATION OF PORTIONS 66 AND 67 OF THE FARM BRAKKLOOF NO. 443, PLETTENBERG BAY IN TERMS OF THE KNYSNA, WILDERNESS AND PLETTENBERG BAY REGIONAL STRUCTURE PLAN

1. The Department has received your request for confirmation of the status and designation of the above-mentioned property in terms of the above Regional Structure Plan, which was originally approved as a Guide Plan in Government Notice No. 1708 of 5 August 1983, but later declared as a Regional Structure Plan in Government Notice No. 170 of 9 February 1996.
2. I hereby confirm that Portions 66 & 67 of the farm Brakkloof No. 443 (Plettenberg Bay) was indeed included in the Knysna, Wilderness and Plettenberg Bay Regional Structure Plan. These portions were designated as 'Township'.
3. Based on the above information, it is therefore the view of this Department that the property mentioned above **is** exempted from the provisions of the Subdivision of Agricultural Land Act, 1970 (Act 70 of 1970).
4. We trust that the above would assist you to finalise the General Plans, received for these properties. Should you require any further information, please do not hesitate to contact Elma Vreken from my office on 044 – 814 2010 or on e-mail: elma.vreken@westerncape.gov.za



www.westerncape.gov.za

Department of Environmental Affairs and Development Planning



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e-mail: janet@ecoroute.co.za

Yours faithfully

**Gavin
Benjamin**

Digitally signed by Gavin
Benjamin
Date: 2021.11.10 09:50:11
+0200

MR. GAVIN BENJAMIN

DIRECTOR: DEVELOPMENT MANAGEMENT (REGION3)

WCG: DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

DATE OF DECISION: 10 November 2021

Copies to:

Director: Land Use and Soil Management

Department of Agriculture, Forestry and Fisheries

Private Bag X120

PRETORIA

0001

Attention: Ms. Annette Geertsema (e-mail: AnnetteS@dalrd.gov.za)

Director Land Use Management

Western Cape: Department of Agriculture

Private Bag X1

ELSENBURG

7607

Attention: Mr Cor van der Walt (e-mail: corvdw@elsenburg.com)



www.westerncape.gov.za

Department of Environmental Affairs and Development Planning



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The Surveyor General

Western Cape: Department of Rural Development and Land Reform

Private Bag X9073

CAPE TOWN

8000

Attention: Mr J Williamson (e-mail: julian.williamson@dalrd.gov.za)

The Surveyor General

Western Cape: Department of Rural Development and Land Reform

Private Bag X9073

CAPE TOWN

8000

Attention: Mr Andrew Ballantyne (e-mail: andrew.ballantyne@dalrd.gov.za)



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ANNEXURE 2: DEPARTMENT OF AGRICULTURE LETTER REGARDING HOUSING DEVELOPMENT



**Western Cape
Government**

Cor Van Der Walt

LandUse Management

Email: Cor.VanderWalt@westerncape.gov.za

tel: +27 21 808 5099 fax: +27 21 808 5092

OUR REFERENCE : 20/9/2/4/6/687
YOUR REFERENCE : -
ENQUIRIES : Cor van der Walt

Eco Route Environmental Consultancy

Email: joclyn@ecoroute.co.za

Att: Joclyn Marshall

PROPOSED HOUSING DEVELOPMENT: DIVISION KNYSNA

PORTION 66 OF THE FARM BRAKKLOOF NO 443

PORTION 67 OF THE FARM BRAKKLOOF NO 443

Your application of 08 September 2022 has reference.

The Western Cape Department of Agriculture: Land Use Management has no objection to the proposed application.

Please note:

- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.
- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely

Mr. CJ van der Walt

<u>Copies:</u>	
Department of Environmental Affairs & Development Planning	Bitou Municipality
Private Bag X 6509	Private Bag X1002
George	PLETTENBERG BAY
6530	6600

LANDUSE MANAGER: LANDUSE MANAGEMENT

2022-10-05

