



SITE SENSITIVITY VERIFICATION REPORT

PROPOSED WAREHOUSE AND STORAGE FACILITY ON PORTION 250 OF THE FARM 745, GOEDGELOOF, ST FRANCIS BAY, EASTERN CAPE.



14 December 2023

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EAPASA reg no.: 2022/5006

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 portion 250 of Farm Goedgeloof 745, St Francis Bay, Eastern Cape.

(2) The proposed development at the property

Eco Route Environmental Consultancy were appointed by the applicant, **Goedgeloof Properties (Pty) Ltd**, as the independent Environmental Assessment Practitioner to conduct a Basic Assessment application process for the proposed development on portion 250 of the Farm Goedgeloof 745, St Francis Bay.

The proposed development comprises of a warehouse and light industrial units that will provide space for light industry and will be zoned appropriately. The total area of the warehouse and storage facilities will be 17 652.10 m², with a total development footprint of 32 490.10 m² including parking bays and paved road. There is a total of 309 storage units in Block B to O of 31m² each. The warehouse will contain 20 units of 297m² each. The development will entail the clearing of approximately 3.25 ha (32490.10 m²) of vegetation. The coverage is approximately 34.5% of the total property (5.1078 Ha).



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The following will form part of the development footprint:

- ❖ Block A Warehouse Units (6 224.80 m²)
- ❖ Block B - O Storage Units (11 407.20 m²)
- ❖ Security gatehouse (20.10 m²)
- ❖ 147 Parking Bays (1 838 m²)
- ❖ Concrete paved Driveway (13 000 m²)
- ❖ Refuse Yard
- ❖ Electric powerline area and pipeline servitude (combined 0.27 ha)
- ❖ Areas for re-establishment of wetlands incorporating retention ponds and stormwater run-off.
- ❖ 10-meter buffer zone from artificial wetland areas.

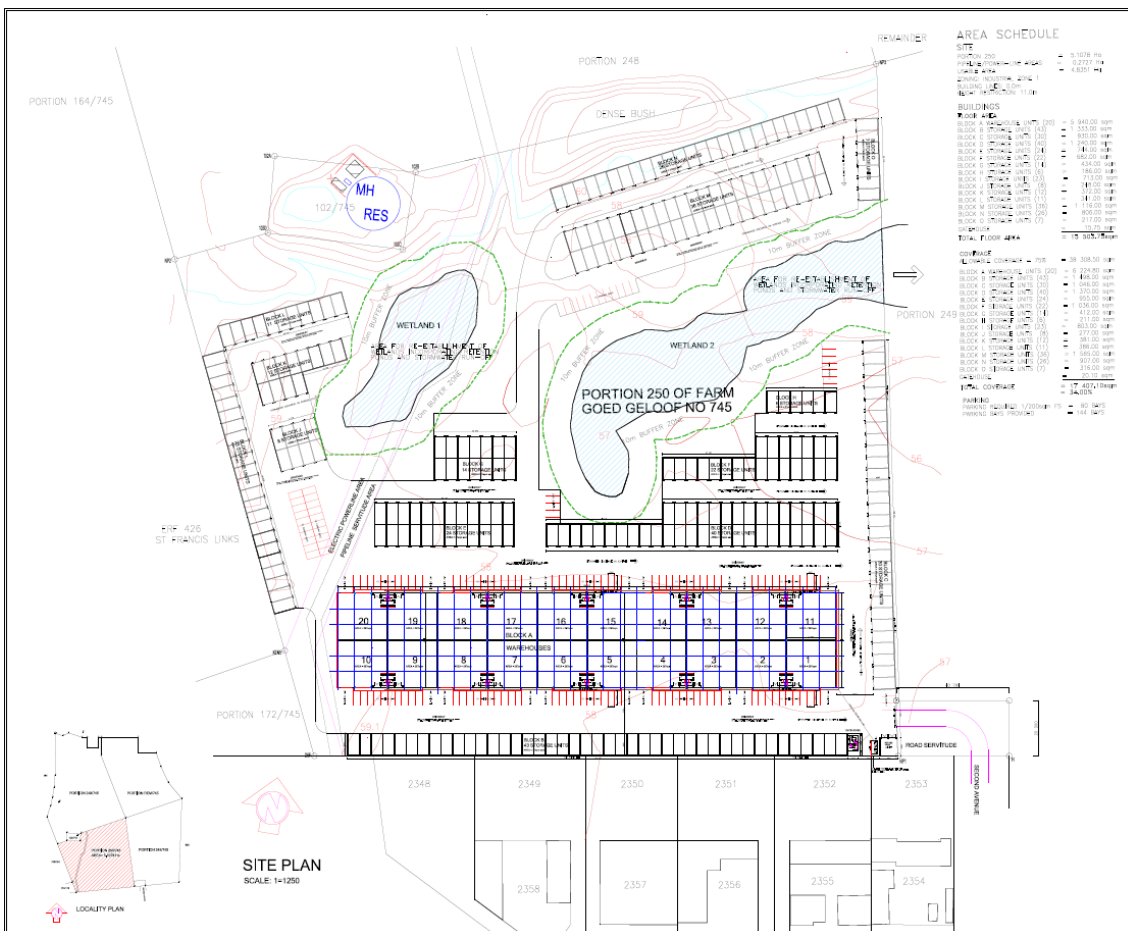


Figure 2: Site Development Plan for Alternative Layout 1 (Preferred Layout).

(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: *Transformation of land* | *Indigenous vegetation*.



(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
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	Specialist Assessment
2	Archaeological and Cultural Heritage Impact Assessment	General
3	Palaeontology Impact Assessment	General
4	Terrestrial Biodiversity Impact Assessment	Impact Assessment
5	Aquatic Biodiversity Impact Assessment	Compliance Statement
6	Socio-Economic Assessment	General
7	Plant Species Assessment	Compliance Statement
8	Animal Species Assessment	Compliance Statement



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

7)(1) Agriculture

The screening report indicates that the receiving environment has a **VERY HIGH** Relative Agricultural Sensitivity. An Agricultural Compliance Statement was compiled by DSA (Appendix D3). As summarised in the report, the study area exhibits agricultural potential, particularly for arable crops, but successful cultivation would be limited to certain crops and high management inputs. Therefore, a medium sensitivity is proposed. Due to the small footprint and low impact on existing agricultural activities, it is the specialist's opinion that the development continues. The development will not have a significant impact on agricultural in the area and poses no threat to food security. In terms of agricultural sensitivity, the development should thus be allowed to proceed.

Recommendations:

The development will not have a significant impact on agricultural in the area and poses no threat to food security. The sensitivity for Agricultural should therefore be **MEDIUM**, and an agricultural Impact Assessment is **disputed**. An Agricultural Compliance Statement is therefore sufficient.

(7)(2) Archaeological & Cultural Heritage

The screening report indicates that the receiving environment has a **LOW** Relative Archaeological & Cultural Heritage Sensitivity. A Notification of Intent to Develop (NID) will be submitted to the Eastern Cape Provincial Heritage Resources Authority in terms of the National Heritage Resources Act, Act No. 25 of 1999 (NHRA 1999).

(7)(3) Palaeontology

The screening report indicates that the receiving environment had a **VERY HIGH** Palaeontological Sensitivity.

A Notification of Intent to Develop (NID) will be submitted to the Eastern Cape Provincial Heritage Resources Authority in terms of the National Heritage Resources Act, Act No. 25 of 1999 (NHRA 1999).

(7)(4) Landscape/Visual

Visual impacts from the site would mostly be on the southern areas which is primarily industrial. The dune to the north of the site provides screening to the residential areas to the north and northeast of the site, as shown by the elevations below.



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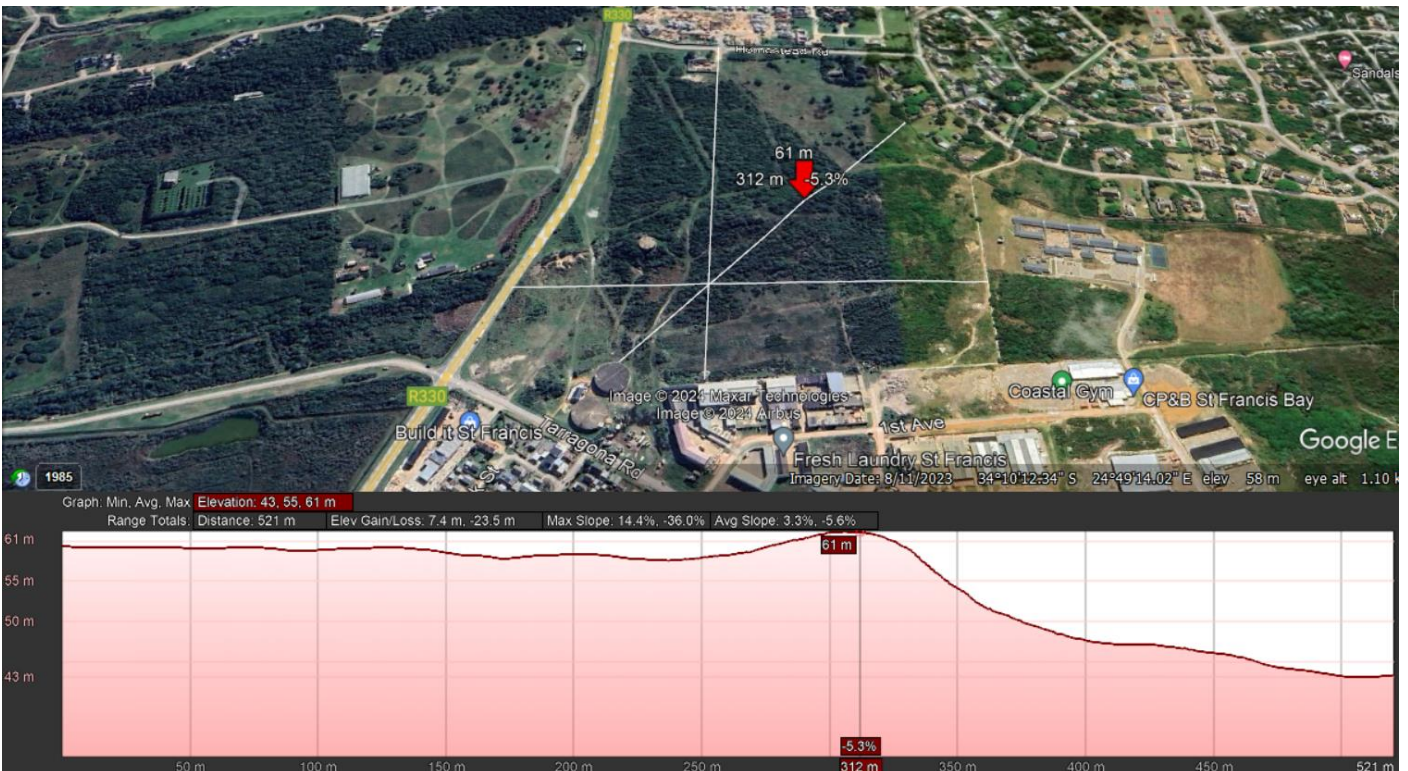
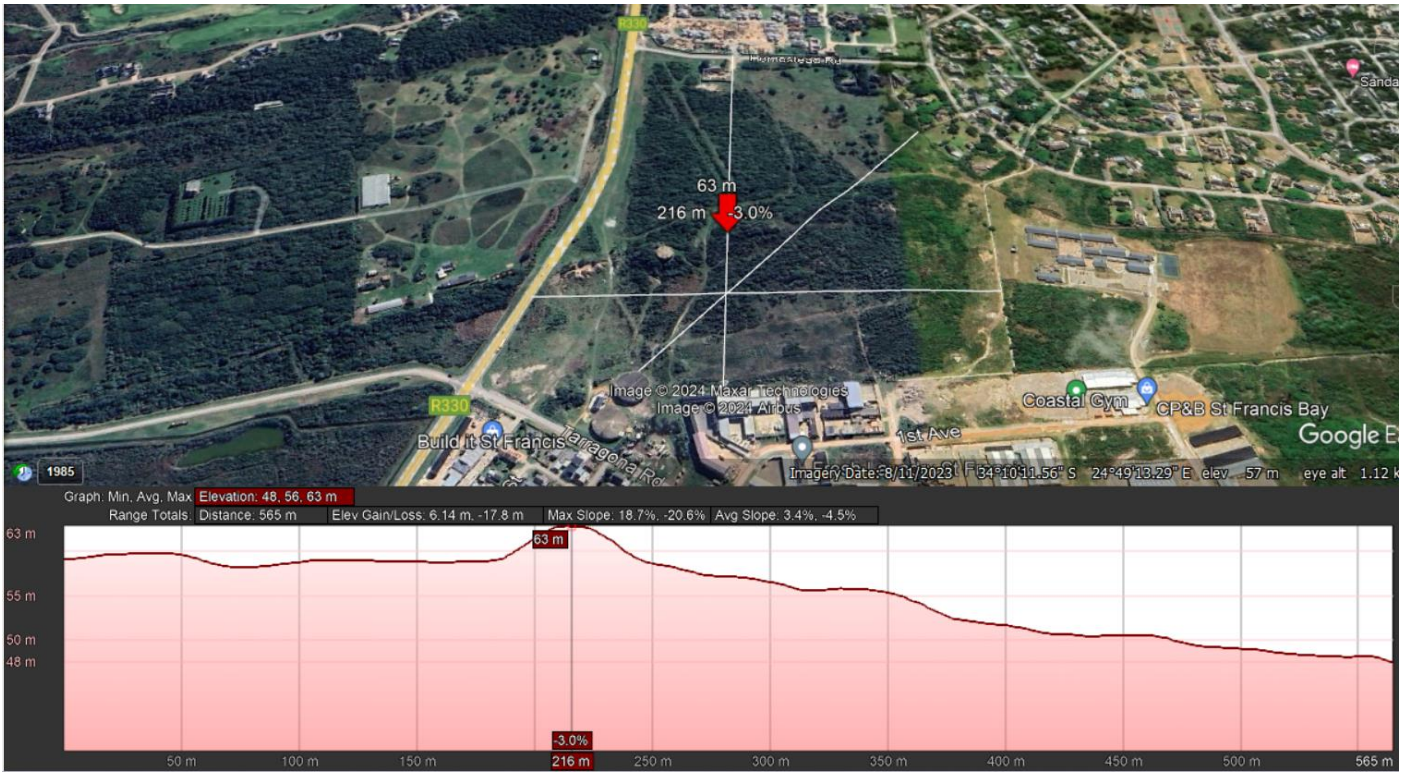
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Recommendations:

Visual Impacts are expected to be **LOW**. Mitigations with regards to screening will be addressed in the EMP. A Visual Impact Assessment is therefore disputed.



(7)(5) 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)(6) Socio-Economical

A light industrial facility can create a range of employment opportunities, from skilled labor in manufacturing and logistics to administrative roles. This contributes to reducing unemployment rates, which is becoming an increasing concern in the local communities. The presence of a light industrial facility can also support community development by offering training programmes, skills development, and entrepreneurial opportunities for local residents. This enhances the overall quality of life and empowers individuals to participate in economic activities. Developing such a facility can also lead to improved infrastructure and services around the area that will benefit both the facility and the surrounding community.

Recommendations:

Socio Economical aspects are addressed in Section 9 of the Basic Assessment Report. A separate Socio-Economical Assessment for a development of this size and associated impacts is **disputed**.

(7)(7) Aquatic

The screening reports indicate that the receiving environment has a **LOW** Aquatic Biodiversity Sensitivity. A Wetland Assessment was compiled by Confluent Environmental due to the artificial depression wetlands identified on site.

The combination of the desktop survey, analysis of historical imagery and site visit found no evidence of the presence of any natural watercourses on the property. All observed wetlands on site are considered to be artificial. While the ecological importance of these artificial wetlands is low, they are moderately important in terms of their hydro-functional attributes and could provide a useful function with respect to attenuating stormwater runoff. Furthermore, they do currently provide habitat for a local diversity of amphibian and bird species. Recommendations made by the specialist have been incorporated into the Basic Assessment Report.

Recommendations:

It is recommended that no further Aquatic Biodiversity Assessments be undertaken.

(7)(8) Animal Species

The screening reports indicate that the receiving environment has a **HIGH** Relative Animal Species Sensitivity due to the possible presence of several Species of Conservation Concern, as indicated below.

Table 3: Animal Sensitivity Features.

Sensitivity	Feature(s)
High	Aves-Circus ranivorus
High	Aves-Bradypterus sylvaticus
Medium	Aves-Neotis denhami
Medium	Aves-Eupodotis senegalensis
Medium	Aves-Stephanoaetus coronatus
Medium	Sensitive species 8
Medium	Invertebrate-Aneuryphymus montanus

There is a large amount of rubble on site, indicating illegal dumping, and grazing by goats and cattle is clearly evident. A large section of the site has been brushcut, and the Alien Invasive Plants (AIP) rooikranz (*Acacia cyclops*) and Port Jackson Willow (*Acacia saligna*) occurs in medium densities where brushcutting has not occurred recently. The site is generally quite degraded and there was evidence of large amounts of informal dumping and litter throughout the site. Satellite imagery from 2018 indicates that large scale dumping historically occurred on the site. Several temporary rudimentary shelters were encountered throughout the wetland area. The smaller wetland depressions provide very limited ecological function and, in some instances have been used for dumping of solid waste. It was also evident that the site is utilised by locals as an open defecation site. The two depression wetlands provide good habitat for a variety of wetland plants and biota including amphibian and bird species. The conservation of the artificial wetlands as incorporated in the design of the development may support avifauna and amphibians.





Recommendations:

It is recommended that Animal Species Theme should be **LOW** as habitat has been degraded through anthropogenic activities and grazing and may provide little habitat for Species of Conservation Concern. An Animal Species Assessment / Compliance Statement is therefore disputed.

(7)(9) Plant Species

The screening reports indicate that the receiving environment has a **MEDIUM** Relative Plant Species Sensitivity due to the possible presence of several Species of Conservation Concern, as indicated below.

Table 4: Plant Species Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity
Medium	Aspalathus recurvispina
Medium	Lebeckia gracilis
Medium	Sensitive species 308
Medium	Hyobanche robusta
Medium	Erica chloroloma
Medium	Erica glandulosa subsp. fourcadei
Medium	Sensitive species 588
Medium	Sensitive species 657
Medium	Centella tridentata var. hermanniifolia
Medium	Rapanea gilliana
Medium	Sensitive species 1192
Medium	Sensitive species 1032
Medium	Syncarpha sordescens
Medium	Sensitive species 78
Medium	Agathosma stenopetala
Medium	Cotyledon adscendens
Medium	Capeochloa cincta subsp. sericea
Medium	Sensitive species 448
Medium	Erica glumiflora

A Terrestrial Biodiversity Impact Assessment was compiled by SRK Consulting, December 2023 (Appendix D2). One plant species of conservation concern (SCC) was observed within the study area during the survey. It should be noted that, although not observed during the site visits, certain SCCs (as listed as occurring within *St. Francis Dune Thicket*) could potentially be present on site but could have been overlooked due to the timing of these site visits. Although it is possible that these species also occur within the site boundary, it is unlikely due to the size of the development footprint. All potentially occurring SSC as well as SSC observed on site are included in the Table below.

FAMILY	SPECIES	NFA	NECO	ToPs
Aizoaceae	<i>Carpobrotus deliciosus</i> (L. Bolus) L. Bolus		Sch 4	
Amaryllidaceae	<i>Scadoxus puniceus</i> (L.) Friis & Nordal		Sch 4	
Apocynaceae	<i>Gomphocarpus</i> sp.		Sch 4	
Orchideaceae	<i>Bonatea speciosa</i> (L.f.) Willd.		Sch 4	
Orchideaceae	<i>Eulophia speciosa</i> (R.Br. ex Lindl.) Bolus		Sch 4	
Rutaceae	<i>Agathosma apiculata</i> E.Mey. ex Bartl. & H.L. Wendl.		Sch 4	
Sapotaceae	<i>Sideroxylon inerme</i> L. subsp. <i>inerme</i>	x		

Rapanea gilliana, or dwarf Cape Beech, is an Endangered species that occurs in dune fynbos and fynbos mosaics between Sedgefield in the Western Cape and Port Alfred in the Eastern Cape. It grows in shallow to deep coastal sands and is tolerant of fire (Victor 2006). It is relatively tolerant of disturbance, including brushcutting, as it has the ability to resprout, but will not tolerate transformation.



The species has an EOO of 2940 km² and an Area of Occupancy of 10.95 km² (SANBI 2020). The population consists of approximately 15 small severely fragmented subpopulations (Victor 2006). Current threats are habitat loss as a result of coastal development, alien plant invasions and industrial development in the Coega Special Economic Zone. Where it is found, including the development site, it can be one of the dominant species. It is estimated that there are between 50-100 individuals on site.

The SANBI guidelines for Endangered species (Criterion B, C, D) are that no further loss of habitat should be permitted as the likelihood is high that the species will go extinct if current pressures continue (Raimondo *et al.* 2009). *R. gilliana* remains common in the surrounding intact dune fynbos, and occurs in surrounding protected areas. As the site is located between residential and industrial development exposed to multiple threats, the species is unlikely to persist without intervention.

Two other threatened species are considered to have a MEDIUM possibility of occurring on site. *Hyobanche robusta* occurs in deep coastal sands and only emerges from below ground during its flowering season in July to November. The potential habitat for this species is limited to the vegetated dune community on site.

The vegetation on site is the correct habitat for Vulnerable species 588 and the species has been recorded in the vicinity of the site. However, it is difficult to identify as recent brushcutting has taken place.

Recommendations:

The Terrestrial Biodiversity Impact Assessment addresses relative plant species sensitivity. It is therefore recommended that no further assessments for Plant Species be undertaken.

(7)(10) Terrestrial Biodiversity

The screening report indicate that the receiving environment has a **VERY HIGH** Terrestrial Biodiversity Sensitivity.

Sensitivity	Feature(s)
Very High	Critical biodiversity area 1
Very High	Critical biodiversity area 2
Very High	Strategic Water Source Areas

A Terrestrial Biodiversity Impact Assessment was compiled by SRK Consulting, December 2023 (Appendix D2).

According to the National Vegetation Map by Mucina and Rutherford (2012), the proposed site falls within *St. Francis Dune Thicket* (FFs 28), listed as Least Concern. The majority of the vegetation on the site is moderately intact and consists of a mosaic of coastal fynbos species and thicket woody shrub and tree species. The site investigation identified 47 indigenous plant species within the site boundary.

The site is located within a terrestrial CBA1 and CBA2 according to the ECBCP (refer to Figure 6). This requires that the biodiversity be maintained in near natural state with minimal loss of ecosystem integrity. According to Berliner, *et al.* (2007), no transformation of natural habitat should be permitted.



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Figure 3: Critical Biodiversity Areas and Ecological Support Areas.

Recommendations:

A Terrestrial Biodiversity Impact Assessment was compiled by SRK Consulting. It is recommended that no further Terrestrial Biodiversity Assessments be undertaken.