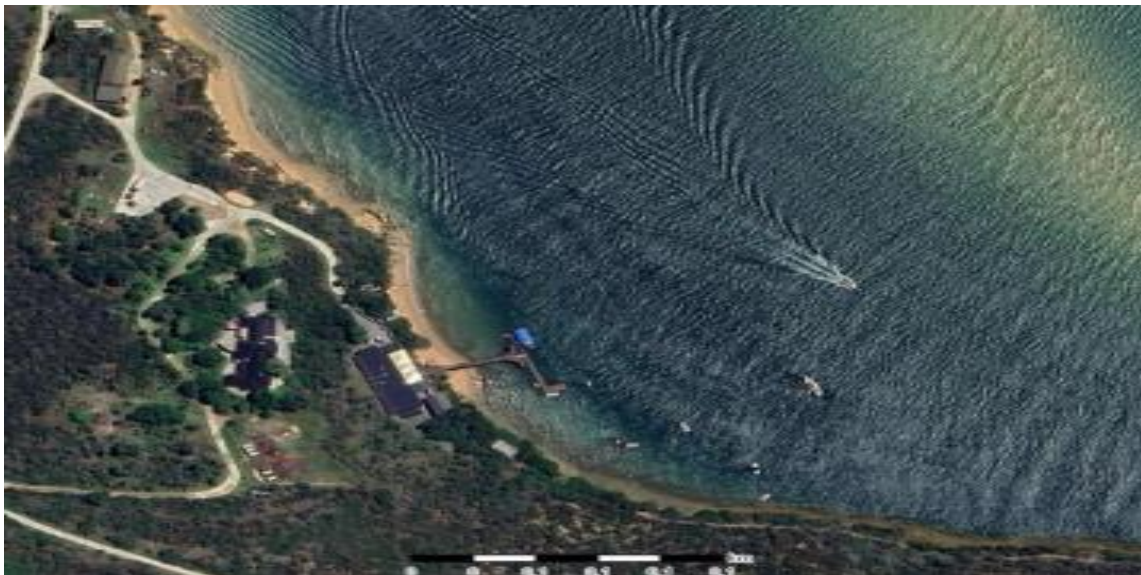




Pre – Application SITE SENSITIVITY VERIFICATION REPORT

For

PROPOSED DEVELOPMENT ON PORTION 59 OF FARM 216,
UITZICHT, KNYSNA, WESTERN CAPE



PREPARED FOR:	Kobus Smit
PREPARED BY:	Eco Route Environmental Practitioners Joclyn Marshall (EAPASA 2022/5006); assisted by Justin Brittion (Can. EAPASA 2023/6648)
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SUBMITTED TO:	Competent Authority I&AP's

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STATEMENT OF INDEPENDENCE

I, **Joclyn Marshall**, of Eco Route Environmental Consultancy, in terms of section 33 of the NEMA, 1998 (Act No. 107 of 1998), as amended, hereby declare that I provide services as an independent Environmental Assessment Practitioner (**EAPASA Reg: 2022/5006**) and receive remuneration for services rendered for undertaking tasks required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended). I have no financial or other vested interest in the project.



EAP SIGNATURE: _____

1. INTRODUCTION

Eco Route Environmental Consultancy has been appointed by **Kobus Smit** to ensure compliance with regulations contained in the National Environmental Management Act (NEMA Act No. 107 of 1998) and the Environmental Impact Assessment Regulations (2014), as amended, for the proposed construction of managers' cottages, conference centre and tourist facilities, garages, and an entertainment facility on Portion 59 of Farm 216, Knysna (hereafter referred to as "the property").

Table 1: Western Cape SG information of the property

SG Region:	KNYSNA
Erf Nr:	Portion 59 of the Farm Uitzigt 216
Area (Ha):	13.58
SG Code:	C03900000000021600059

The property is partially protected by the Featherbed Nature Reserve, a private reserve. To the east, the property is bordered by the Knysna Estuary, which lies along its northern boundary.

Table 2: Coordinates of the property boundaries

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Western Boundary	34°	04'	24.75"	23°	02'	56.45"
Southern Boundary	34°	04'	37.08"	23°	02'	59.01"
Eastern Boundary	34°	04'	33.29"	23°	03'	05.60"
Northern Boundary	34°	04'	22.41"	23°	03'	03.26"



Figure 1: Locality Map of Portion 59/216

1.1. Purpose of the Report

The Site Sensitivity Verification Report (SSVR) forms part of the Basic Assessment Process for the proposed development. This report addresses the findings of the Screening Tool Report, generated from the National Web Based Environmental Screening Tool, and provides a motivation for the various specialist studies identified to be conducted. It also discusses whether the specialist studies forming part of this project are required to comply with the protocols.

The “Protocols for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes (“the protocols”) were promulgated in Government Notice No. 320, published in Government Gazette No. 43110 on the 20th of March 2020 and which came into effect on the 9th of May 2020. The Protocols are allowed for in terms of Sections 25(5)(a) and (h) and 44 of the National Environmental Management Act, 1998 (as amended) (Act No. 107 of 1998) (“NEMA”).

The Protocols must be complied with for every new application for Environmental Authorisation (EA) that is submitted after 9 May 2020. According to the Protocols, the EAP must verify the current use of the site in question and its environmental sensitivity as identified in the screening tool to determine the need for specific specialist inputs.

2. ENVIRONMENTAL CONSIDERATIONS

2.1. Terrestrial Biodiversity and Plant Species

According to the National Vegetation Map produced by SANBI (VEGMAP, 2018), the property is designated to contain Knysna Sand Fynbos and Goukamma Dune Thicket (Figure 2).

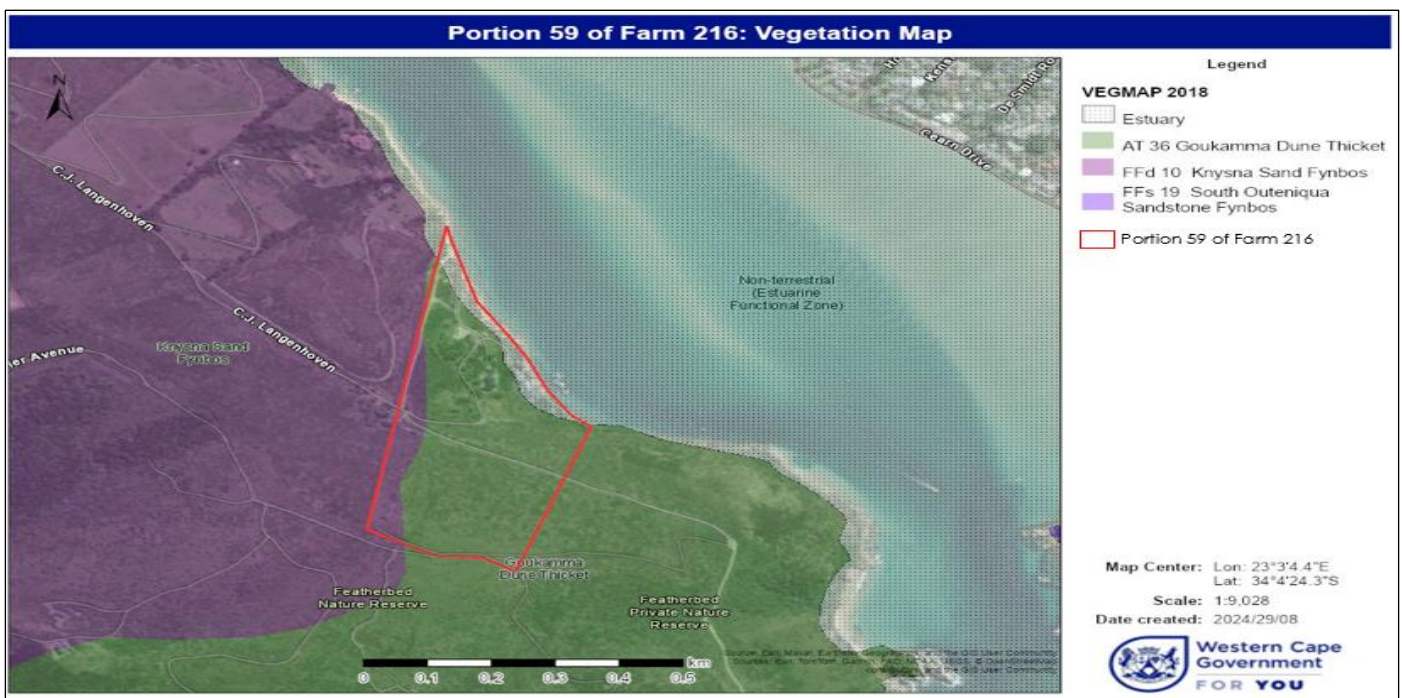


Figure 2: VEGMAP 2018 indicating Knysna Sand Fynbos and Goukamma Dune Thicket on the Property

These two vegetation types respectively possess a Critically Endangered (Knysna Sand Fynbos) and Least Concern (Goukamma Dune Thicket) threat status (Figure 3).



Figure 3: SANBI Original Ecosystem Threat Status

However, according to the specialist assessment input provided by Capensis (2024), the current vegetation on the site is highly modified, but the remnants that do occur suggest that a mosaic of Dune Thicket (which contains fynbos elements) and Forest patches were originally present. The habitat map (Figure 4) distinguishes between Forest, Dune Thicket and their condition. The habitats categories include (1) Degraded Forest, (2) Highly degraded Forest, (3) Degraded Dune Thicket, (4) Highly degraded, (5) Highly degraded – Landscaped areas and (6) Transformed.



Figure 4: Identification of Habitats (Capensis, 2024)

One Plant Species of Conservation Concern (SCC) has been identified (Figure 5), whereby the specialists (Capensis, 2024) have determined that the development will not have a detrimental effect on this SCC.



Figure 5: SCC Identified on Portion 59/216

2.2. Aquatic Sensitivities

No water resources were identified on the property itself (Figure 6); however, the proposed development is adjacent to the Knysna Estuary. As a result, careful measures will be implemented to limit development activities and manage stormwater runoff and erosion, ensuring minimal impact on the estuary's sensitive ecosystem.



Figure 6: Aquatic Sensitivities Associated with Portion 59 of Farm 216

2.3. Faunal Biodiversity

The DFFE screening tool identified the property to have a high / medium faunal biodiversity sensitivity, however specialist (Confluent, 2024) determined that there were no SCC on the property. Therefore they recommended that the sensitivity rating should rather be considered low, and that general best practice mitigations must be adhered to for all faunal species in general.

2.4. Sensitive Area Consideration

The property forms wholly part of a Protected Area (Featherbed Private Nature reserve) (Figure 7). According to the Western Cape Biodiversity Spatial Plan (WCBSBP, 2017) the following definition and management objective applies.

Definition: Areas that are formally protected by law and recognised in terms of the NEMPAA. This includes gazetted private Nature Reserves and Protected Environments concluded via a stewardship programme

Management objective: Must be kept in a natural state with a management plan focussed on maintaining or improving the state of biodiversity.



Figure 7: Western Cape Biodiversity Spatial Plan (WCBSBP 2017) Sensitive areas

2.5. Topography

The topography of the property shows a varying landscape with elevations ranging from approximately 5 meters near the shoreline to about 185 meters inland (Figure 8). The contour lines, spaced at 5-meter intervals, highlight a steep gradient, particularly in the central and southern parts of the property, with slopes becoming less steep as you approach the water's edge.



Figure 8: Topography map of Portion 59 of Farm 216

3. PROPOSED DEVELOPMENT (PREFERRED ALTERNATIVE – ALTERNATIVE A)

Four distinct structures will be developed as part of the proposed project (Figure 9), all collectively referred to as “the proposed development.” These structures are outlined in the Basic Assessment as follows:

- Managers' Cottages
- Conference Centre and Tourist Facilities
- Garages
- Entertainment Facilities

The majority of the proposed development will take place on areas that have already been disturbed. Consequently, no alternative plan was considered more suitable. This option presents the least environmental impact and does not necessitate changes to the current planning and design.

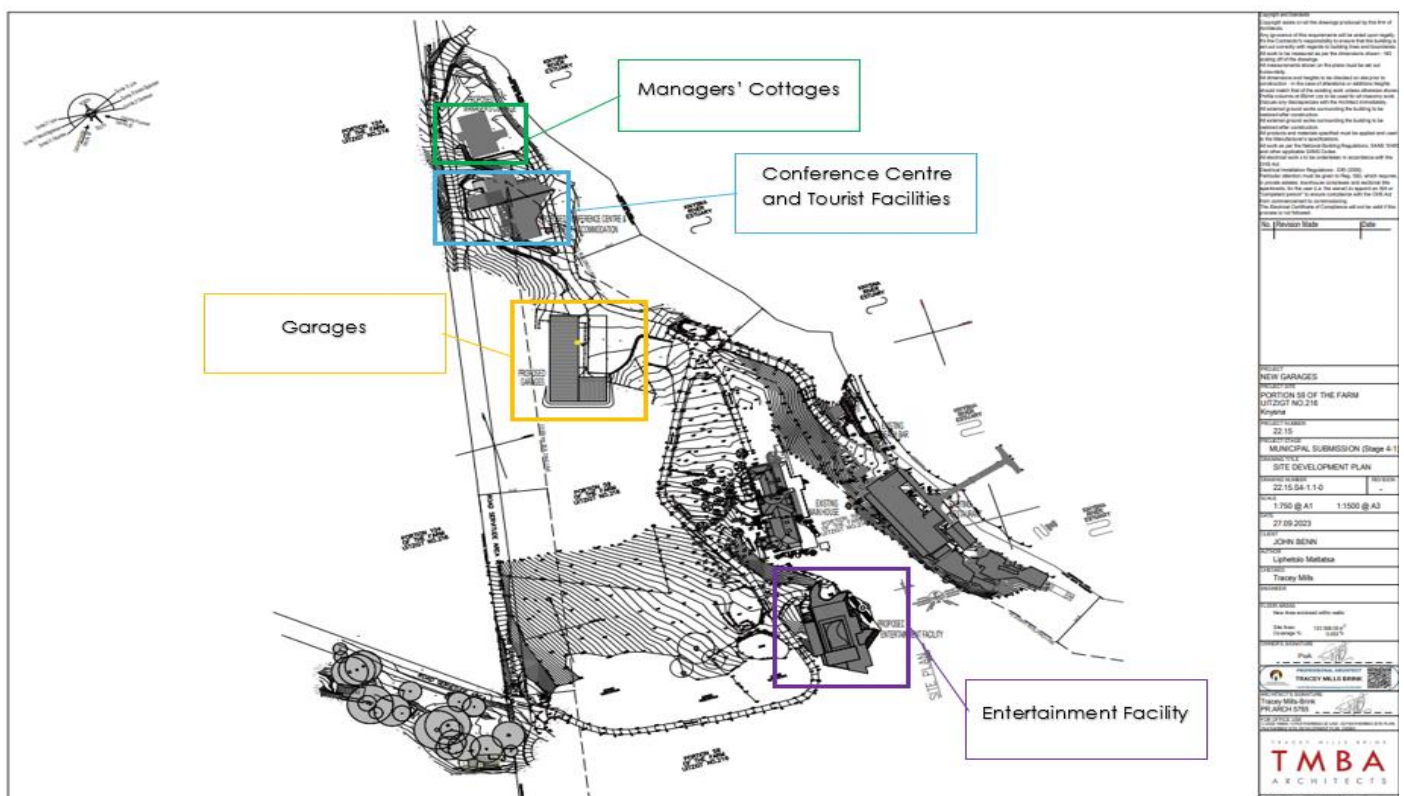


Figure 9: Proposed development (TMBA, 2024)

4. ENVIRONMENTAL SCREENING RESULTS AND ASSESSMENT OUTCOMES

A Department of Forestry, Fisheries, and the Environment (DFFE) national web-based screening tool was generated (03 May 2024) to review the environmental sensitivities for *Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property*.

The screening report list a variety of specialist studies to be undertaken based on the data informants of the tool at the study area.

The application classifications selected for the screening report was –

- *Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property*

4.1. Environmental Management Frameworks Relevant to the Application

The Garden Route Environmental Management Framework is applicable to the proposed development.

https://screening.environment.gov.za/ScreeningDownloads/EMF/gardenroute_finalreport.pdf

The Basic Assessment process should consider impacts on biodiversity, water resources, soil stability, air quality, and noise. It must also address socio-economic factors, such as effects on the local community and cultural significance, while ensuring compliance with the National Environmental Management Act (Act 107 of 1998) and local zoning laws. Mitigation measures should include an Environmental Management Plan and continuous monitoring. Public participation is essential to involve and address concerns from stakeholders and the community.

4.2. Relevant Development Incentives, Restrictions, Exclusions or Prohibitions

The proposed site is within both a South African Conservation Area (SACAD) and a South African Protected Area (SAPAD). Conservation Areas are currently not regulated through national or provincial legislation. However, Protected Areas are.

In consideration of this governance and the proposed development, the property is within the Featherbed Private Nature Reserve, which is declared a Protected Area under Section 9 of the National Environmental Management Protected Areas Act (Act 57 of 2003).

In Section 50(5) it further states that –

- No **development**, construction or farming may be permitted in a national park, nature reserve or world heritage site without the prior written approval of the management authority.

Thereby, Knysna Municipality will be consulted for approval as they have been identified as the management authority of Featherbed Private Nature Reserve

The Garden Route National Park borders the proposed development area, however no development will occur within the SANParks area. They will however be consulted during Public Participation.

4.3. Proposed Development Area Environmental Sensitivity

The Screening Tool Report generated for *Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property* identifies the following summary of environmental sensitivities related to the property, highlighting only the highest sensitivity areas. These identified environmental sensitivities for the proposed development footprint are indicative and have been verified on-site by registered qualified specialists.

Table 3: Environmental Sensitivities according to the DFFE screening tool report (05 Feb 2024)

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			

4.4. Identified Specialist Input Required

Based on the selected classifications (*Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property*). Including considerations of the environmental sensitivities of the proposed development footprint). The following specialist assessments have been identified for inclusion in the assessment report.

Table 4: Identified specialist assessments (Infrastructure / Localised infrastructure / Infrastructure in the Sea-Estuary-Littoral Active Zone-Development Setback_100M Inland or coastal public property).

No:	Specialist Assessment	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

5. SITE SENSITIVITY VERIFICATION METHODOLOGY

According to the protocols, the Site Sensitivity Verification must be conducted by the Environmental Assessment Practitioner (EAP), or in some cases, by a specialist. This verification process includes:

- Desktop analysis
- Site inspection

In this instance, satellite imagery from sources such as Google Earth Pro, Google Maps, Cape Farm Mapper, and QGIS was utilised to develop a clear understanding of the site's conditions prior to the proposal for the development. Additionally, site inspections were performed to validate and "ground-truth" the data collected through the desktop analysis.

6. SITE SENSITIVITY VERIFICATION

Most of the site sensitivities identified for the proposed development were accurately portrayed. It was only the agricultural and civil aviation theme that should have been lower.

Table 5: Site sensitivity verification of the identified environmental sensitivities

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture ✓		X (incorrectly reported – should be lower)	X	
Animal Species		X		
Aquatic Biodiversity	X			
Archaeological & Cultural Heritage				X

Civil Aviation			X(incorrectly reported – should be lower	X
Defence				X
Palaeontology			X	
Plant Species		X		
Terrestrial Biodiversity	X			

Agriculture:

Most of the development area has been mapped to be medium sensitivity, and also include areas that are marked as low sensitivity (Figure 10). By this the screening tool has generated a wrongful sensitivity for the proposed development area.

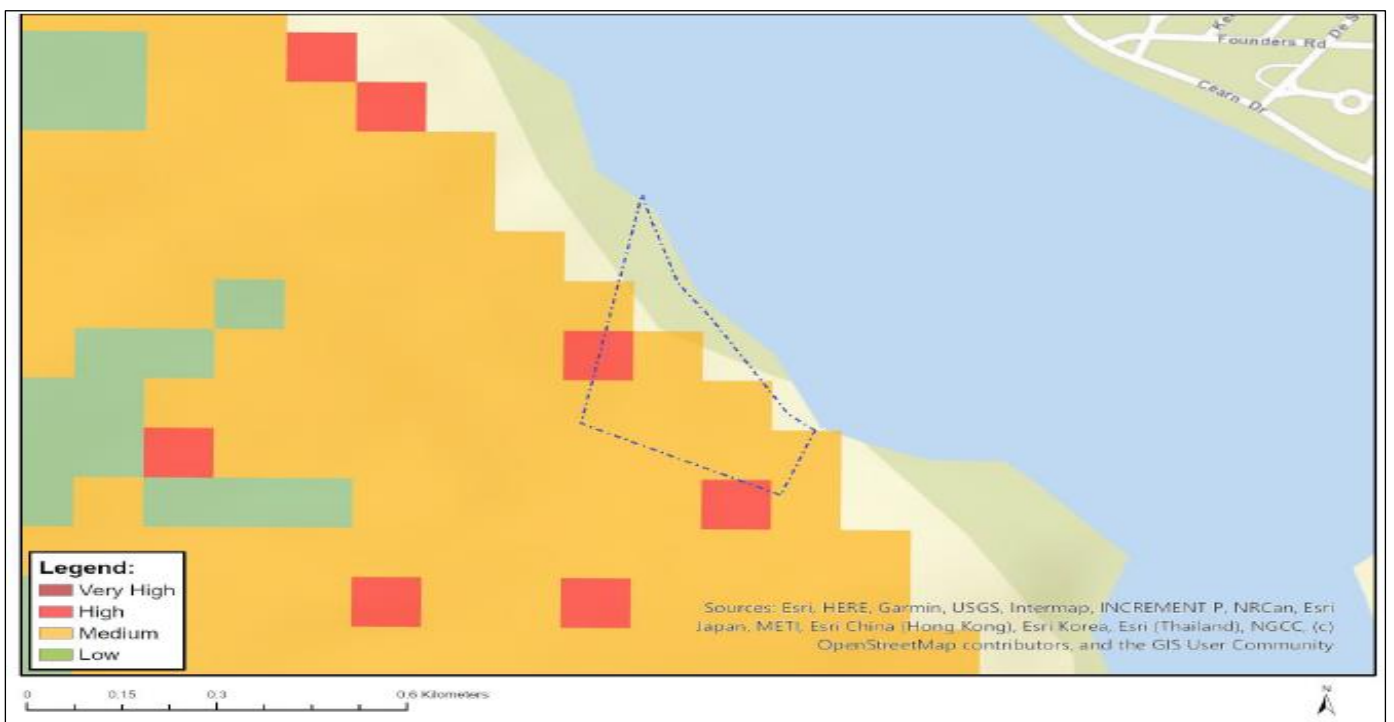


Figure 10: MAP OF RELATIVE AGRICULTURE THEME SENSITIVITY

Additionally, a review of historical and recent satellite imagery from 1973, 2010, and the latest from 2024 shows no evidence of agricultural activity on the property proposed for development (Figure 11).



Figure 11: Comparison view of the property from 1973, 2010, and 2024 (left to right)

Civil Aviation:

The DFFE screening tool's medium sensitivity rating for the civil aviation theme, based on the presence of an aerodrome between 8 and 15 km from Portion 59 of Farm 216, may be overly cautious considering the specifics of the proposed development. Given the significant distance between the aerodrome and the project site, there is minimal likelihood of interference with civil aviation operations. The proposed development is unlikely to involve structures or activities that could impact aviation safety or navigation. Therefore, a low sensitivity rating is more appropriate, as the civil aviation theme would remain unaffected by the nature and scale of the development at this distance.

In addition to verifying the identified sensitivities, in terms of the Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in terms of Section 24 (5) (a) and (h) and 44 of the National Environmental Management Act, 1998 (GN 320 of 2020), the Environmental Assessment Practitioner provides reasons for not including an identified specialist study.

The following table (Table 6) serves as reasoning for including / not including specialist input related to the proposed development.

Table 6: Verification of included specialist input related to the proposed development

DFFE Identified Specialist Assessment
<p><u>Agriculture Compliance Statement:</u></p> <p>According to the Protocols for Agricultural Assessments, a compliance statement is required when the agricultural theme is rated as either medium or low sensitivity. In this case, following the verification of the agricultural theme, theoretically, such a statement is necessary. However, based on previous experiences where an agricultural assessment was required, the primary objective was to address the following key question:</p> <p><i>Will the proposed development cause a significant reduction in agricultural production potential, and most importantly, will it result in a loss of arable land?</i></p> <p>The assessment of the agricultural production potential for the proposed development site concluded that the property is too small to support economically viable agricultural activities.</p>

Additionally, the property is zoned as part of the Feather Private Nature Reserve, which prevents it from being converted back into agricultural land.

Based on this understanding, an agricultural specialist was not consulted for an assessment of the property.

Disputed

Landscape/Visual Impact Assessment:

The proposed development will primarily involve infrastructure placed in areas where previous infrastructure existed. The extent of the impact will be limited to the local surroundings, affecting only the immediate area. After implementing the mitigation measures outlined in the Environmental Management Programme (EMPr), the cumulative environmental effect is expected to remain low.

Disputed

Archaeological, Cultural Heritage and Palaeontology Impact Assessment:

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

A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act will be submitted to Heritage Western Cape. It will be determined by Heritage Western Cape whether the proposed residential development on Erf 2924, Knysna, will impact heritage resources. The need for and external Archaeological & Cultural Heritage assessment will be determined upon submission of the NID.

Disputed

Civil Aviation Compliance Statement:

The DFFE screening tool's medium sensitivity rating for the civil aviation theme, based on the presence of an aerodrome between 8 and 15 km from Portion 59 of Farm 216, may be overly cautious considering the specifics of the proposed development. Given the significant distance between the aerodrome and the project site, there is minimal likelihood of interference with civil aviation operations. The proposed development is unlikely to involve structures or activities that could impact aviation safety or navigation. Therefore, a low sensitivity rating is more appropriate, as the civil aviation theme would remain unaffected by the nature and scale of the development at this distance.

Disputed

Terrestrial Biodiversity and Plant Species Impact Assessment:

The generated screening tool report indicated that the Terrestrial Biodiversity of the property has a very high sensitivity rating, and that plant species has a high sensitivity rating. Therefore, Eco Route Environmental Consultants appointed Greg Nicolson and Adam Labuschagne from Capensis Ecological Consulting (Pty) Ltd to provide specialist terrestrial biodiversity and plant species input for the proposed development.

Commenced (Report dated July 2024) (Appendix D1)

Aquatic Biodiversity Impact Assessment

The generated screening tool report indicated that the Aquatic Biodiversity of the property has a very high sensitivity rating. Therefore, Eco Route Environmental Consultants appointed Confluent Environmental Pty (Ltd) to provide specialist aquatic biodiversity input for the proposed development.

Commenced (Report dated June 2024) (Appendix D2)

Marine Impact Assessment:

The Aquatic Impact Assessment (Appendix D2) evaluated the potential impact on the adjacent marine environment, specifically the Knysna Estuary, and concluded that with mitigation measures, the impact would be low to negligible. As a result, a separate Marine Impact Assessment is not required.

Disputed

Geotechnical Assessment:

Most of the infrastructure will be constructed on previously disturbed areas or behind the recommended NO-GO line near the Knysna Estuary. Additionally, no abnormal foundation excavation is planned, so it was determined that a geotechnical assessment is not required.

However, if the Competent Authority mandates this assessment, the Pre-Application documents (BAR, EMPr, and SSVR) will be updated accordingly.

Disputed

Socio-Economic Assessment:

Given the existing socio-economic landscape, the proposed development is unlikely to alter the neighbourhood's socio-economic dynamics negatively, thus a socio-economic study is disputed.

Disputed

Animal Species and Avian Assessment:

The generated screening tool report indicated the Animal Species theme of the property to have a high sensitivity rating. Additionally it included the need for Avifauna Impact assessment. Therefore, Eco Route Environmental Consultants appointed Confluent Environmental Pty (Ltd) to provide specialist faunal input for the proposed development.

Commenced (Report dated July 2024) (Appendix D3)

Photographic evidence



Proposed area for managers' cottages



Proposed area for managers' cottages



Proposed area for managers' cottages



Proposed area for Conference centre and tourist facilities



Proposed area for Garages



Proposed area for Entertainment facility

7. CONCLUSION

After consideration of the identified environmental sensitivities and the identified specialist that need to provide input according to the generated screening tool report. This report supplements reason for inclusion and exclusion of studies that support the Pre-Application Basic Assessment Report.

The following table is a summary of specialist input gained during the Pre-Application Basic Assessment –

No:	Specialist Assessment	Assessment Protocol
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
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