Eco Route
Environmental Consultancy
REGISTRATION NO. 1998/031976/23

46 President Steyn, The Island, Sedgefield
Western Cape, South Africa

Mobile: 082 557 7122
Email: admin@ecoroute.co.za
Website: www.ecoroute.co.za

Pre-Application
SITE SENSITIVITY VERIFICATION REPORT – Draft 1

For

PROPOSED DEVELOPMENT OF ASSISTED CAMPING FACILITIES FOR THE LOVEMORE FAMILY - PORTION 104 OF FARM 216, UITZICHT, KNYSNA, WESTERN CAPE

PREPARED FOR:	**Lovemore Children's Secondary Trust**
PREPARED BY:	Eco Route Environmental Practitioners (Lead EAP Joclyn Marshall – 2022/5006) Assisted by Justin Brittion – Can. 2023/6648)
DOCUMENT REFERENCE:	2025.09.08 – Pre-Application Site sensitivity verification report 104-216.
DFFE Ref	**TBC**
DATE:	**2025/05/30**

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EAP SIGNATURE: 

1. INTRODUCTION

Portion 104 of Farm 216, Knysna (hereafter referred to as "the property") the Knysna Estuary on the northern boundary, and Featherbed Private Nature reserve on the western boundary. The property extends **9.96 Ha** (as per the title dead).

SG Region:	KNYSNA
Farm Nr:	104/216
Area (Ha):	9.96
SG Code:	C0390000000021600104

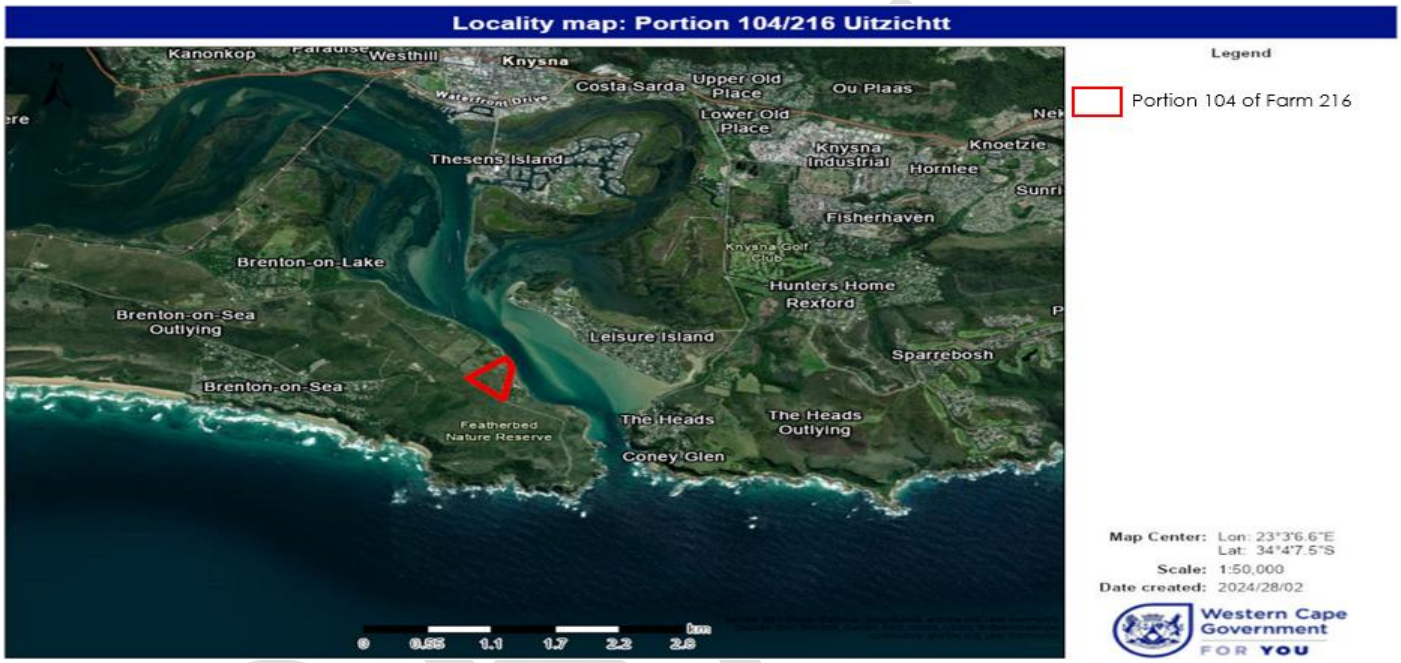


Figure 1: Locality Map of Portion 104 of Farm 216

Access to the site will be via Dolley Raats Street (a tarred road) that transitions into a gravel road, Dominee J.F. du Toit Avenue, which eventually becomes C.J. Langenhoven, leading towards the property. The following coordinates indicate the boundaries of the property (Google Earth, 2024).

FEATURE	LATITUDE (S)			LONGITUDE (E)		
	DEG	MIN	SEC	DEG	MIN	SEC
Northern Boundary	34°	04'	11.13"	23°	02'	54.85"
Eastern Boundary	34°	04'	16.84"	23°	02'	58.28"
Southern Boundary	34°	04'	26.60"	23°	02'	55.97
Western Boundary	34°	04'	17.99	23°	02'	44.04

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 CONCIDERATIONS

This section presents the available environmental data alongside specialist confirmations to assess the current state of the receiving environment. It considers historical classifications and identifications, integrating ground-truthing information to provide context for the present conditions. This approach is necessary because desktop data may not always align with the actual findings on-site.

2.1. Vegetation

According to the National Vegetation Map of South Africa (SANBI, 2018) (Figure 2) the expected vegetation type on the property would be Knysna Sand Fynbos (Critically Endangered).

Figure 2: SANBI Original Ecosystem Status including Knysna Sand Fynbos

Table 1: Important Information Regarding Knysna Sand Fynbos (SANBI, 2018)

FFh 10 Knysna Sand Fynbos	VT 4 Knysna Forest (85%) (Acocks 1953). LR 2 Afromontane Forest (72%), LR 4 Dune Thicket (24%) (Low & Rebelo 1996). BHU 100 Knysna Afromontane Forest (72%) (Cowling et al. 1999b, Cowling & Heijnis 2001).
Distribution	Western Cape Province: Garden Route coastal flats from Wilderness, generally to the north of the system of lakes, several patches around the Knysna Lagoon, with more isolated patches eastwards to the Robberg peninsula near Plettenberg Bay. Altitude 40–300 m.
Vegetation & Landscape Features	Undulating hills and moderately undulating plains covered with a dense, moderately tall, microphyllous shrubland, dominated by species more typical of sandstone fynbos.
Geology & Soils	Deep, acid Tertiary sand inland of coastal dunes forming regic sands and soils of Lamotte form. Land types mainly Hb and Ga.
Climate	MAP 670–1 090 mm (mean: 850 mm), with a slight peak in autumn and spring. Mean daily maximum and minimum temperatures 27.3°C and 7.3°C for February and July, respectively. Frost incidence 2 or 3 days per year. See also climate diagram for FFd 10 Knysna Sand Fynbos (Figure 4.57).
Important Taxa	Small Tree: Widdringtonia nodiflora. Tall Shrubs: Cliffortia linearifolia, Leucadendron eucalyptifolium, Metalasia densa, Passerina corymbosa. Low Shrubs: Anthospermum aethiopicum, Berzelia intermedia, Cliffortia drepanoides, Clutia rubricaulis, Erica diaphana, E. glandulosa subsp. fourcadei, E. glumiflora, E. sessiliflora, Helichrysum asperum var. asperum, Lachnaea diosmoides, Leucadendron salignum, Leucospermum cuneiforme, Lobelia coronopifolia, Morella quercifolia, Muraltia squarrosa, Oedera imbricata, Protea cynaroides, Stoebe plumosa, Tephrosia capensis. Herbs: Geranium incanum, Helichrysum felinum. Graminoids: Aristida junciformis subsp. galpinii, Brachiaria serrata, Cynodon

	dactylon, Eragrostis capensis, Ficinia bulbosa, Heteropogon contortus, Ischyrolepis eleocharis, Tetraria cuspidata, Thamnochortus cinereus, Themeda triandra, Tristachya leucothrix.
Conservation	Endangered. Target 23%. Patches are statutorily conserved in the proposed Garden Route National Park (about 3%) as well as 2% in several private nature reserves. Almost 70% already transformed (pine and gum plantations, cultivation, Knysna urban sprawl, building of roads). Alien Acacia melanoxylon, A. mearnsii and A. longifolia occur locally at low densities. Erosion very low and moderate.
Remarks	This is a very poorly researched vegetation unit.

* Reference - Taylor (1970b), Drews (1980a).

The vegetation within the study area was mapped at a fine scale in the C.A.P.E. Fine-scale Mapping Project by Vlok, Euston-Brown, & Wolf (2008). According to this mapping, two distinct vegetation units are identified within the study area: Groenvlei Coastal Forest (Endangered) and Sedgefield Thicket-Fynbos (Least Threatened).

Taking this into consideration, together with ground truthing information (e.g. disturbance caused by alien invasive plant species and the 2017 Knysna veld fires), the proposed vegetation on the property consist of a fynbos thicket mosaic of varying degrees of degradation. This vegetation is closer in structure to Sedgefield Thicket-Fynbos and Goukamma Dune Thicket found on the property directly adjacent to the eastern side (Featherbed Nature Reserve) (Capensis, 2024).

The habitat map (Figure 3) distinguishes between dune thicket and thicket-fynbos vegetation, and their corresponding condition. The habitats mapped at the site include (1) Degraded Dune Thicket, (2) Degraded Thicket-Fynbos, and (3) Transformed vegetation.

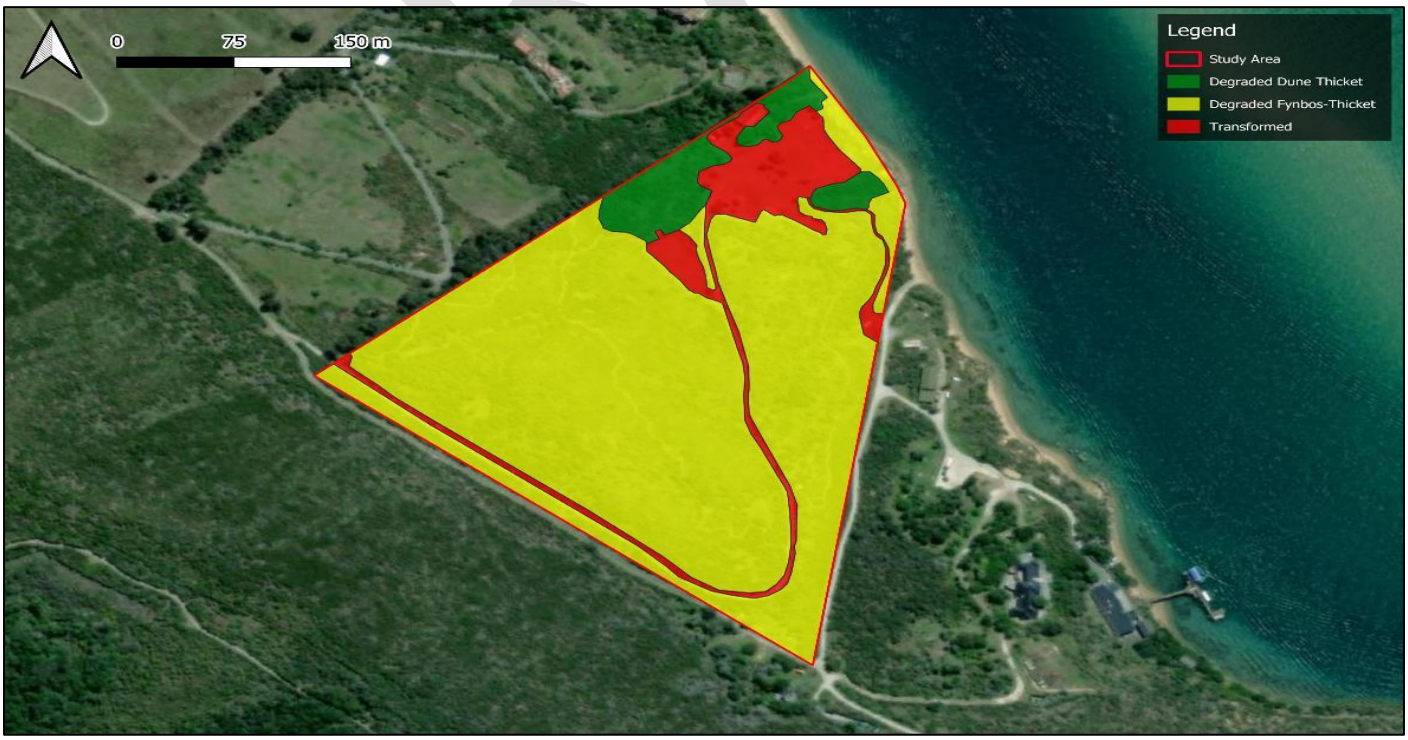


Figure 3: The habitats identified at the study area, superimposed on an ESRI TM satellite image (Capensis, 2024)

2.1.1. Degraded Dune Thicket

Several portions of the study area can be classified as degraded dune thicket. This habitat is found primarily on the north-western boundary of the site, with smaller areas to the north-east. The vegetation consists primarily of moderately sized thicket shrubs and small trees (2 -2.5m). The dominant species, much like the rest of the site is Osteospermum moniliferum however this vegetation type is distinguished from the thicket-fynbos vegetation by its increased diversity of thicket species and its denser structure (Capensis, 2024).

2.1.2. Degraded Fynbos Thicket

The majority of the site is covered in thicket-fynbos vegetation. The composition and structure of the habitat conforms more closely to the Sedgefield Fynbos-Thicket habitat described by Vlok, Euston-Brown, & Wolf (2008) than to Knysna Sand Fynbos (VEGMAP, 2018). The vegetation is dominated by Osteospermum monileferum, with other sclerophyllous shrub species forming a dense mid-canopy layer. These include Passerina corymbosa and Metalasia muricata. Thicket species such as Pterocelastrus tricuspidatus and Searsia lucida are fairly common and are likely to increase in density should fire continue to be excluded from the site. Two species of conservation concern were found in this habitat. These include Lebeckia gracilis (EN), and Selago villicaulis (VU). Within the dense fynbos-thicket vegetation there are open gaps, supporting low growing vegetation such as Helichrysum cymosum, Helichrysum foetidum, Helichrysum petiolare, Selago corymbosa, and Ficinia acuminata (Capensis, 2024).

2.1.3. Transformed Habitat

Transformed habitat contains very little indigenous or naturally occurring vegetation and describes areas of the study area that have been converted to open grassy areas or replaced by roads and other hard infrastructure (buildings, concrete pads etc.). The vegetation is dominated by grasses such as Cynodon dactylon, Stenotaphrum secundatum, and Pennisetum clandestinum, interspersed with common ruderal species (Capensis, 2024).

2.1.4. Sensitivities related to the identified habitats

In the case of the study area, a **medium sensitivity** applies to the Degraded Fynbos-thicket habitat for the following reasons (Capensis, 2024):

1. The site classified as a CBA 1 and CBA 2 in the WCBSP. The CBA 1 area would be more accurately classified as CBA 2 due to the poor condition of the vegetation.
2. Two SCC were found in this habitat (*Lebeckia gracillis* & *Selago villicaulis*).
3. The ecological functioning of this habitat is moderately modified. The historic medium to high density of IAPs and high intensity fires have depleted the species richness of the vegetation.
4. This habitat occurs on moderate to steep slopes which would be prone to erosion if developed.
5. The restoration potential of this area is moderate with appropriate active management inputs.

A **Low sensitivity** applies to the Degraded Dune Thicket habitat for the following reasons (Capensis, 2024):

1. The vegetation type present is Least Concern, however the vegetation that remains in this habitat is only marginally representative of the original ecosystem in its current condition. However, it does contain "indigenous vegetation" by definition.
2. The site classified as CBA 1 and CBA 2 in the WCBSP. The CBA 1 area would be more accurately classified as CBA 2 due to the poor condition of the vegetation.
3. Two protected tree species were found in this habitat (White Milkwood *Sideroxylon inerme* and Outeniqua yellowwood *Afrocarpus falcatus*). The white milkwood is likely naturally occurring whereas the Outeniqua yellowwood appears to have been planted.
4. The ecological functioning of this habitat is modified in its current state due to the long history of high-density IAPs and significant fire events.
5. The restoration potential of this habitat is low to moderate without active management inputs, but restoration is possible, and recommended for the areas which are not developed.

A **Very Low sensitivity** applies to the Transformed habitat for the following reasons (Capensis, 2024):

1. The indigenous vegetation has been almost completely removed from this habitat, with the dominant vegetation consisting of lawn grasses.
2. One individual of one SCC (*Selago villicaulis*)was found in this habitat however this species is fairly abundant elsewhere on the property.

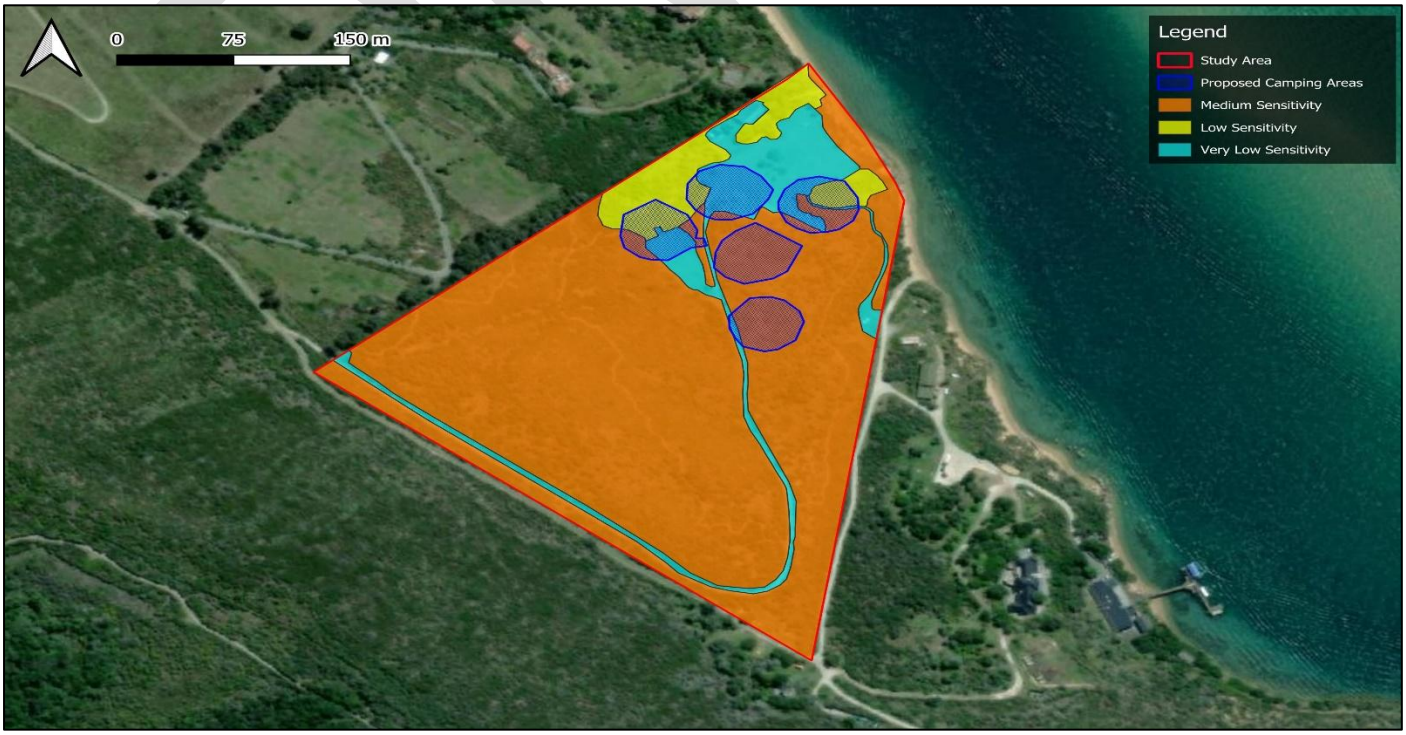


Figure 4: The sensitivities for habitats described in the study area overlaid on an ESRI ™ image.

Although a Species of Conservation Concern has been identified on the property, the architect (Tracey Mills Brink, 2025) designed the layout of the preferred alternative to avoid impacting the species (see 2025.09.09 – Pre-Application Basic Assessment Report) It will be recommended, as part of the mitigation measures and the Environmental Management Programme, that the location of this species be clearly demarcated and remain undisturbed throughout all phases of the development

2.2. Sensitive Areas (CBA, ESA, AND PA)

The Western Cape Biodiversity Spatial Plan (WCBSP, 2017) designated the property as situated within a Critical Biodiversity Area (CBA:1 – To maintain and CBA:2 – To restore), including terrestrial and aquatic features. An Ecological Support Area (ESA:2 – To restore) is also included on the property.

CBA1: Terrestrial – Terrestrial

Definition: Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.

Objective: Maintain in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.

CBA1: Aquatic – Wetland

The definition and objective remain the same.

ESA 2: Restore from other land use

Definition: Areas that are not essential for meeting biodiversity targets, but that play an important role in supporting the functioning of PAs or CBAs and are often vital for delivering ecosystem services.

Objective: Restore and/or manage to minimize impact on ecological processes and ecological infrastructure functioning, especially soil and water-related services, and to allow for faunal movement.

By the 2017 Western Cape Biodiversity Spatial Plan the eastern boundary of the site abuts the Featherbed Nature Reserve whereas the north-eastern boundary borders on the Garden Route National Park, both of which as designated protected areas (Figure 5).

Figure 5: Western Cape Biodiversity Spatial Plan (WCBSP 2017) Sensitive areas

However, the new 2023 Western Cape Biodiversity Spatial Plan designated the entire property as a protected area (Figure 6).

Figure 6: Western Cape Biodiversity Spatial Plan (WCBSP 2023) Sensitive areas

Definition: Areas proclaimed as protected areas in terms of national or provincial legislation.
Objective: Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. A benchmark for biodiversity.

It should be noted that that property is not proclaimed as a protected area, but as of the introduction of the 2023 WCBSP, the entire property will be dealt with according to the general guidelines for protected areas.

Table 2: Extract from Western Cape Biodiversity Spatial Plan (2023) regarding protected areas

WCBSP category	Desires management objective	General guidelines
Protected Areas	Must be kept in a natural state, with a management plan focused on maintaining or improving the state of biodiversity. A benchmark for biodiversity.	• All operational aspects of managing these areas must be subject to their main purpose, which is to protect and maintain biodiversity and ecological integrity and should be governed by a formally approved management plan including land-use activities that support the primary function of these areas as sites for biodiversity conservation. • The management plan must identify allowable activities, which should be consistent at least with the CBA 1 category; the location of these allowable activities should be captured in a zonation plan in the management plan. • Activities relating to the construction of roads, administrative or tourism infrastructure and services (such as water reticulation systems, power lines, etc.) that are required to support the primary function of the protected area and its allowable activities, are subject to NEMA authorisation and the protected area management plan. • In the case of Protected Environments, a variety of agricultural land-uses may be allowed, such as livestock grazing, plantation forestry and limited cultivation. The location of these land-use activities must be informed by the WC BSP Map and should be specified in the zonation plan in the management plan for the Protected Environment. All areas of natural habitat that are zoned for conservation use, should be subject to implementation of the land-use guidelines for protected areas, CBAs, and ESAs. • Mountain Catchment Areas are also included in this category, however unlike the other types of protected area, there is no

		requirement for a management plan which would guide allowable land-uses and activities. Therefore, the land-use guideline should be aligned with that of Protected Areas, with the primary intention to ensure the steady supply of good quality water to downstream areas.

2.3. Freshwater Sensitivities

Although the 2017 Western Cape Biodiversity Spatial Plan identifies Critical Biodiversity Areas (CBAs) associated with wetlands on the property, Cape Farm Mapper does not indicate the presence of any wetlands or rivers (perennial or non-perennial) on the site (Figure 7). Furthermore, the aquatic specialist study conducted by Confluent (2024) confirmed that no freshwater features are present on the property.

Figure 7: Map of Freshwater Resources in proximity to Ptn 104 of farm 216

2.4. Fauna

Faunal Specialist (Confluent, 2024) were consulted to provide feedback on the faunal sensitivities relevant to the proposed development property. The GPS tracking gives indication to the extent of a site visit done on 31 May 2024.

Figure 8: Habitats found on Portion104/216 Uitzigt Farm and GPS tracks of the site visits (Confluent, 2024)

2.4.1. Avifauna

No SCC was encountered during the site visit. Three bird counts were conducted across the property, in addition to opportunistic sightings noted throughout the meander and searching for nests/roosting sites in suspected habitat. A total of 16 bird species were identified during the site visit.

Table 3: Avifauna species observed during the site visit (Confluent, 2024)

Common name	Species Name
Speckled Mousebird	*Colius striatus*
Hadada Ibis	*Bostrychia hagedash*
Kelp Gull	*Larus dominicanus*
Pied Crow	*Corvus albus*
Cape White-eye	*Zosterops virens*
Fork-tailed Drongo	*Dicrurus adsimilis*
Bar-throated Apalis	*Apalis thoracica*
Egyptian Goose	*Alopochen aegyptiaca*
African Fish Eagle	*Icthyophaga vocifer*
Cape Bulbul	*Pycnonotus capensis*
Jackal Buzzard	*Buteo rufofuscus*
Southern Boubou	*Laniarius ferrugineus*
Sombre Greenbul	*Andropadus importunus*
Greater Double-collared Sunbird	*Cinnyris afer*
Karoo Prinia	*Prinia maculosa*
Green-backed Camaroptera	*Camaroptera brachyura*

2.4.2. Mammals

There was evidence of sub-surface tunnelling by golden moles found on site especially in the lawn area. A bushbuck was seen on the site and more individuals are suspected based on tracks and droppings found. Caracal scat was also found at the site. There was substantial evidence of mole rat activity, particularly on the lawn area. Rodent paths were also observed.

Table 4: Mammal species observed during the site visit (Confluent, 2024)

Common name	Species Name
Cape White-eye	Zosterops virens
Grey Heron	Ardea cinerea
Jackal Buzzard	Buteo rufofuscus
Karoo Prinia	Prinia maculosa
Kelp Gull	Larus dominicanus
Malachite Sunbird	Nectarinia famosa
Neddicky	Cisticola fulvicapilla
Olive Thrush	Turdus olivaceus
Red-eyed Dove	Streptopelia semitorquata
Sombre Greenbul	Andropadus importunus
Southern Boubou	Laniarius ferrugineus
Southern Fiscal	Lanius collaris
Western Cattle Egret	Bubulcus ibis

2.4.3. Terrestrial Invertebrates

No SCC were found during the site inspections. Cocktail ants (Crematogaster sp.) were found in nests. Spider webs (Araneae) were found on site as were zebra agate snails (Cochlitoma zebra). Pitfall traps did not attract the dung beetle SCC (Circellium bacchus) but many blowflies (Calliphoridae) were attracted to the bait. A pea blue butterfly (Lampides boeticus) as well as an unidentified white lepidopteran (suspected Pieridae) were found during a sweep of the site. Butterfly host plants and ant species were not found at the site.

2.4.4. Amphibians

No amphibians were found, which is not surprising given the lack of any waterbodies/watercourses present on site. Consequently, there was no suitable habitat for the SCC Knysna Leaf-folding Frog (Afrixalus knysnae).

2.4.5. Reptiles

No reptile SCC were highlighted for this site by the DFFE Screening Tool or any of the public platforms. As such, no targeted sampling took place for this group. However, a puffadder was found on the property during the meander

2.5. Coastal Environment

The property slopes down to the northeast towards the Knysna Estuary (coastal environment) which is bordered by a very steep sandy cliff. The sandy cliff shows signs of erosion that is most likely associated with surface water that flows over a large, mowed lawn area immediately adjacent to the cliff. The lawn is located at the base of a relatively steep slope and acts a poor buffer to overland surface water flows which has most likely contributed to the erosion of the cliff face. The soil on the property is very sandy and no hydro-geomorphological landscape features (depressions, confined valleys, channels etc.) indicating the presence of a watercourse (i.e. stream, river or wetland) were observed within the proposed development footprint.

Table 5: Images that show the current state of the coastal environment (Confluent, 2024)

The mitigation measures proposed by the aquatic specialist will be fully considered and incorporated into both the Basic Assessment Report and the Environmental Management Programme (EMPr). Furthermore, it is confirmed that no development activities will be introduced that could negatively affect the coastal environment.

2.6. Heritage

A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act will be submitted to Heritage Western Cape. Heritage Western Cape will determine whether the proposed development might have an impact on heritage resources. Comment will be included in this section of the final Basic Assessment Report.

3. PROPOSED DEVELOPMENT (ALTERNATIVE A – PREFERRED ALTERNATIVE)

Following feedback from the terrestrial biodiversity specialist regarding the identified Species of Conservation Concern (SCC), the original site plan was revised. The node with the highest potential impact (EUA 4) was recommended to be shifted and then confirmed that following the mitigation measures would suffice in keeping the layout in its preferred location. The SDP was adjusted to take the SCC into account. As a result, a modified layout was proposed (Figure 9).

Figure 9: Preferred Layout (Alternative A): The green nodes represent the camping areas that were not recommended for any changes. The yellow section indicates the proposed relocation area for EUA 4. Finally, the red overlay illustrates, in abstract form, the adjustment made to accommodate the identified Species of Conservation Concern (SCC), as advised by Capensis (2025).

3.1. Development Components

Since the initial alternative, which followed a more traditional camping style, the preferred alternative has evolved towards an assisted camping model. The layout still includes five (5) nodes, each consisting of five (5) platforms. The primary distinction between Alternative A (the preferred alternative) and Alternative B is that Alternative A includes two (2) platforms per node designated for indoor sleeping arrangements. One (1) platform will serve as a communal space, featuring a functional kitchen and relaxation area, while the remaining two (2) platforms will accommodate traditional tent-style camping (Figure 10). This concept will be implemented for all five (5) nodes.

Figure 10: Visual representation of the assisted camping setup (TMB Architects, 2025)

3.2. Service considerations

- Access

  It has been confirmed that the proposed development will utilise the existing dirt road solely for access during construction. The road itself will not form part of the construction activities and will not be altered, upgraded, or expanded in any way. During the rehabilitation phase, the road will be retained and, if necessary, returned to its current condition. No construction work will be undertaken on the road.

- Water / Sewage / Electrical

  Each node will make use of harvested rainwater, collected from roofs and gutters, for general use. In addition, a borehole located on the property will supplement the water supply during periods when the Lovemore family is in residence. During times of absence, the aquifer will be allowed to recharge to maintain sustainable capacity.

  One ablution facility will be provided per node, shared among family members. Wastewater from these facilities will be managed through the installation of a bio-septic treatment plant, ensuring environmentally responsible disposal.

  The proposed development is not expected to place any significant additional strain on the property's existing electricity supply. It has therefore been confirmed that the development will connect to the current electrical system servicing the property.

4. ENVIRONMENTALSCREENING RESULTS AND ASSESSMENT OUTCOMES

A Department of Forestry, Fisheries, and the Environment (DFFE) national web-based screening tool was generated (21 August 2024) to review the environmental sensitivities for *Transformation of land / Indigenous vegetation*. It was generated once more (21 August 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 reports both 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 –

- *Transformation of land | Indigenous vegetation.*
- *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 Screening Tool indicated that the proposed site is within both a South African Conservation Area (SACAD) and a South African Protected Area (SAPAD). Conservation Areas have recently become regulated through national and provincial legislation. Read in conjunction with NEMA (Act 107 of 1998), these areas have been considered in the Basic Assessment. The proposed development further takes into consideration governance of protected areas and the proposed development, the coastal area of the property is within the Garden Route National Park, 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.

In which case South African National Parks (SANParks) is the management authority. Although no development is proposed within the boundaries of the Garden Route National Park, SANParks will be consulted.

4.3. Proposed Development Area Environmental Sensitivity

The Screening Tool Report identifies the following summary of environmental sensitivities on the property, highlighting only the areas of highest sensitivity. These sensitivities, as reflected in the Screening Tool output, are indicative and have been verified on site.

Table 6: Environmental Sensitivities according to the DFFE screening tool report

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 both the selected classifications (*Transformation of land | Indigenous vegetation*) as well as (*Infrastructure / 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 Basic Assessment Report.

Table 7: Combined identified specialist assessments for (Transformation of land | Indigenous vegetation) as well as (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

It must be taken into consideration that the current use of the land and the environmental sensitivity of the site, as identified by the national web-based environmental screening tool, was first reviewed and verified (or disputed) in the SSVR. During this verification, the reasons for not including certain specialist assessments were explained. This verification may change under additional input provided during the pre-application public participation.

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 reflected. However, the sensitivities assigned to the agricultural and civil aviation themes appear to have been overestimated and should be considered lower.

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 Impact Assessment (Compliance statement):

Most of the property has been mapped to be medium sensitivity and also include areas that are marked as low sensitivity (Figure 11). By this the screening tool has generated a wrongful sensitivity for the proposed development area.

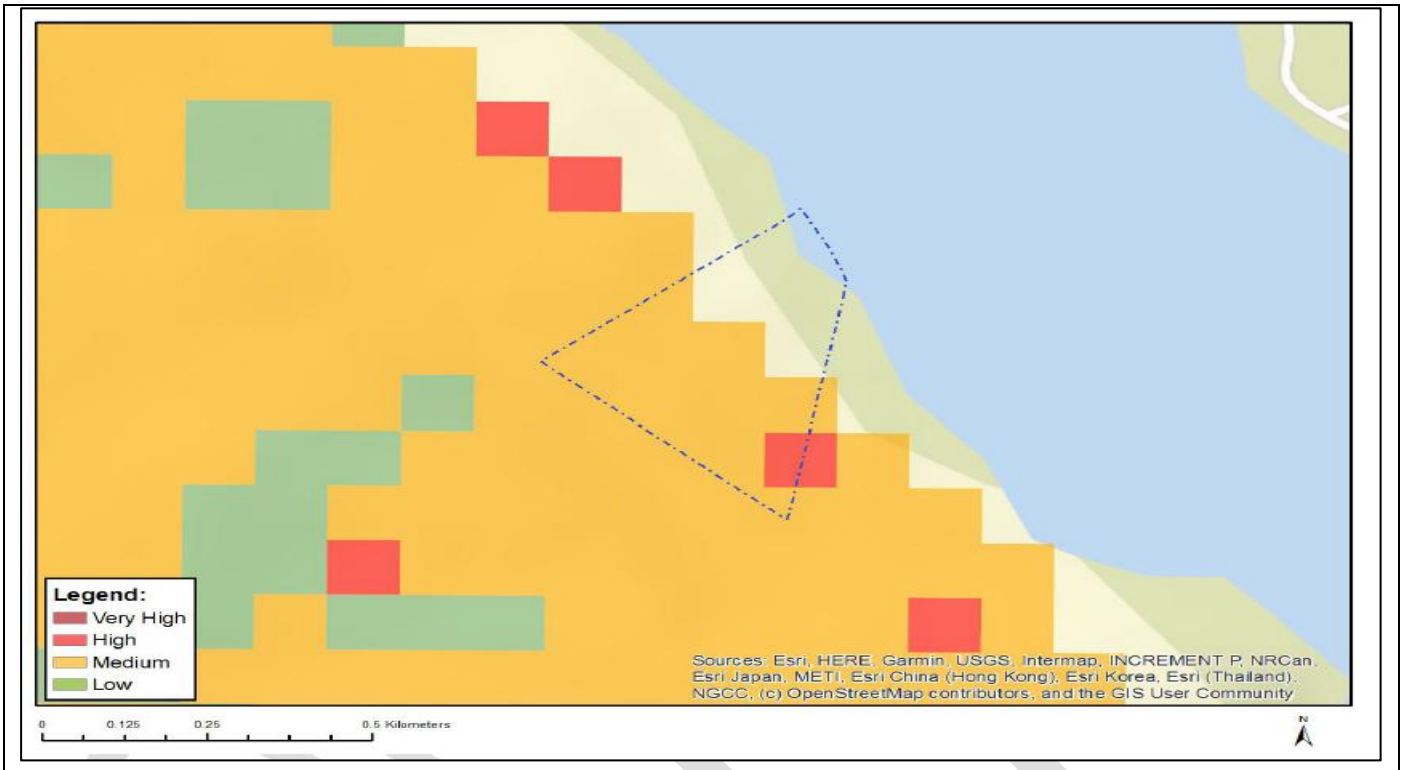


Figure 11: Map of relative agriculture sensitivity (DFFE,2024)

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:

Will the proposed development cause a significant reduction in agricultural production potential, and most importantly, will it result in a loss of arable land?

he proposed development will not result in a significant reduction in agricultural production potential, nor will it lead to the loss of arable land. The subject property, Portion 104 of Farm 216, is characterised by terrain and soil conditions that limit its suitability for intensive agriculture. According to site assessments and specialist input, the area proposed for development comprises largely marginal land, including slopes and naturally vegetated areas leading to low agricultural value.

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

Disputed

Landscape / Visual Impact Assessment:

A Visual Impact Assessment (VIA) was undertaken for the proposed development on Portion 104 of Farm 216, Knysna, to assess the visual sensitivity of the landscape and determine the degree of potential visual intrusion. The assessment was conducted by independent specialist Paul Buchholz and completed in March 2025, following an on-site investigation and desktop analysis conducted in August 2024. The purpose of the VIA was to ensure that the proposed development aligns with the visual character and sensitivity of the receiving environment, particularly in light of the property's visibility from nearby high-sensitivity receptors such as Leisure Island and the Knysna Heads. The report concludes that, while the development may initially introduce a moderate visual modification, this impact is expected to reduce to low over time with the implementation of the proposed mitigation measures. All mitigation measures outlined in the VIA—including

landscaping, colour treatment, earthwork constraints, and structure positioning—will be strictly adhered to in order to maintain the visual integrity of the Garden Route landscape.

Commenced (Report dated March 2025) (Appendix X)

Archaeological, Cultural Heritage and Palaeontology Impact Assessment:

The Screening Report indicates that the receiving environment has a low relative sensitivity for Archaeological and Cultural Heritage, and a medium sensitivity for Palaeontology.

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 development will impact heritage resources. The need for and external Archaeological & Cultural Heritage assessment will be determined upon submission of the NID.

Disputed (until further notice)

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 104 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 X)

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 July 2024) (Appendix X)

Marine Impact Assessment:

The Aquatic Impact Assessment (Appendix X) 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:

The proposed development will utilise lightweight construction materials and will not require extensive foundations. As such, the need for this assessment is not considered necessary at this stage.

However, should the Competent Authority require such an assessment, the Basic Assessment Report and supporting documentation will be updated accordingly to include the relevant findings.

Disputed (until further notice)

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.

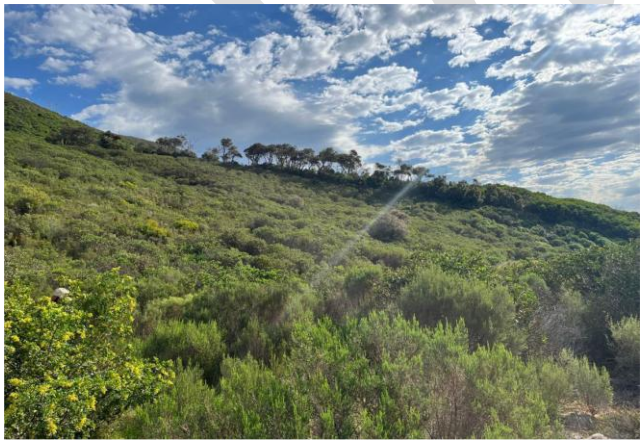
Disputed

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:






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 serves as a summary of specialist input gained during the Pre-Application Basic Assessment –

No:	Specialist Assessment	Assessment Protocol
1	Landscape/Visual 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
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