



## **SITE SENSITIVITY VERIFICATION REPORT**

for the

**PROPOSED DEVELOPMENT OF A RETIREMENT COMPLEX AND MUSEUM OF MANKIND WITH ASSOCIATED TOURISM FACILITIES ON PORTIONS 59, 62 AND 63 OF FARM BRAKKLOOF 443, PLETTENBERG BAY, BITOU MUNICIPALITY, WESTERN CAPE**



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**DATE:**  
**SUBMITTED TO:**

01/04/2026  
Competent Authority

# ECO-ROUTE

## ENVIRONMENTAL

### CONSULTANCY



REGISTRATION NO. 1998/031976/23

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EAP SIGNATURE: \_\_\_\_\_

# Table of Contents:

1. INTRODUCTION.....	4
1.1 Purpose of this report .....	4
2. PROPERTY BACKGROUND / LOCATION INFORMATION .....	4
3. PROPOSED DEVELOPMENT ACTIVITIES.....	7
4. ENVIRONMENTAL CONSIDERATIONS .....	9
4.1 Ecological Threat Status.....	9
4.2 Critical Biodiversity Areas.....	10
4.3 Aquatic resources.....	11
4.4 Protected Areas.....	11
4.5 Topography .....	12
5. ENVIRONMENTAL SCREENING RESULTS AND ASSESSMENT OUTCOMES .....	13
5.1 Relevant Development Incentives, Restrictions, Exclusions or Prohibitions.....	13
5.3 Environmental Sensitivities.....	13
5.4 Identified Specialist Assessments.....	13
6. SITE SENSITIVITY VERIFICATION METHODOLOGY.....	14
6.1 Reason for not including specialist studies or impact assessments .....	15
7. CONCLUSION .....	16

## FIGURES:

Figure 1: Locality map Portion 15 of the Farm 216 Uitzicht, Knysna, Western Cape .....	5
Figure 2: Google Earth aerial photo of 2006 .....	5
Figure 3: Google Earth aerial photo of 2024 .....	6
Figure 4: Proposed Site Development Plan (Imprint Architecture, 29/09/2025).....	8
Figure 5: Vegetation map 2024 – Garden Route Granite Fynbos .....	9
Figure 6: Ecosystem Threat Status as determined by the WCBSP, 2023.....	10
Figure 7: Water resources accordingly designated by Geo-spatial Information (NGI) of the Department of Agriculture, Land Reform and Rural Development (DALRRD).....	11
Figure 8: Protected Areas.....	12
Figure 9: Topography of the site.....	12
Figure 10: Map of relative agriculture theme sensitivity .....	14

## TABLES:

Table 1: Environmental sensitivities.....	13
Table 2: Identified specialist assessments for Transformation of Land Screening Tool Report. ....	13
Table 3: Verification of included specialist input related to the proposed development .....	15

# 1. INTRODUCTION

**Eco Route Environmental Consultancy** has been appointed by Neil Hellman of Star Gate Innovations (Pty) Ltd 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 development of a Retirement village and Museum of Mankind with associated tourism facilities on Portions 59, 62 and 63 of Farm Brakkloof 443, Plettenberg Bay, Bitou Municipality, Western Cape (**hereafter referred to as “the properties”**). The assessment has been informed by a site inspection, recent aerial imagery, available desktop information, as well as specialist assessments and is intended to support the ongoing town planning process by clarifying applicable environmental legislative requirements.

## 1.1 Purpose of this 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”).

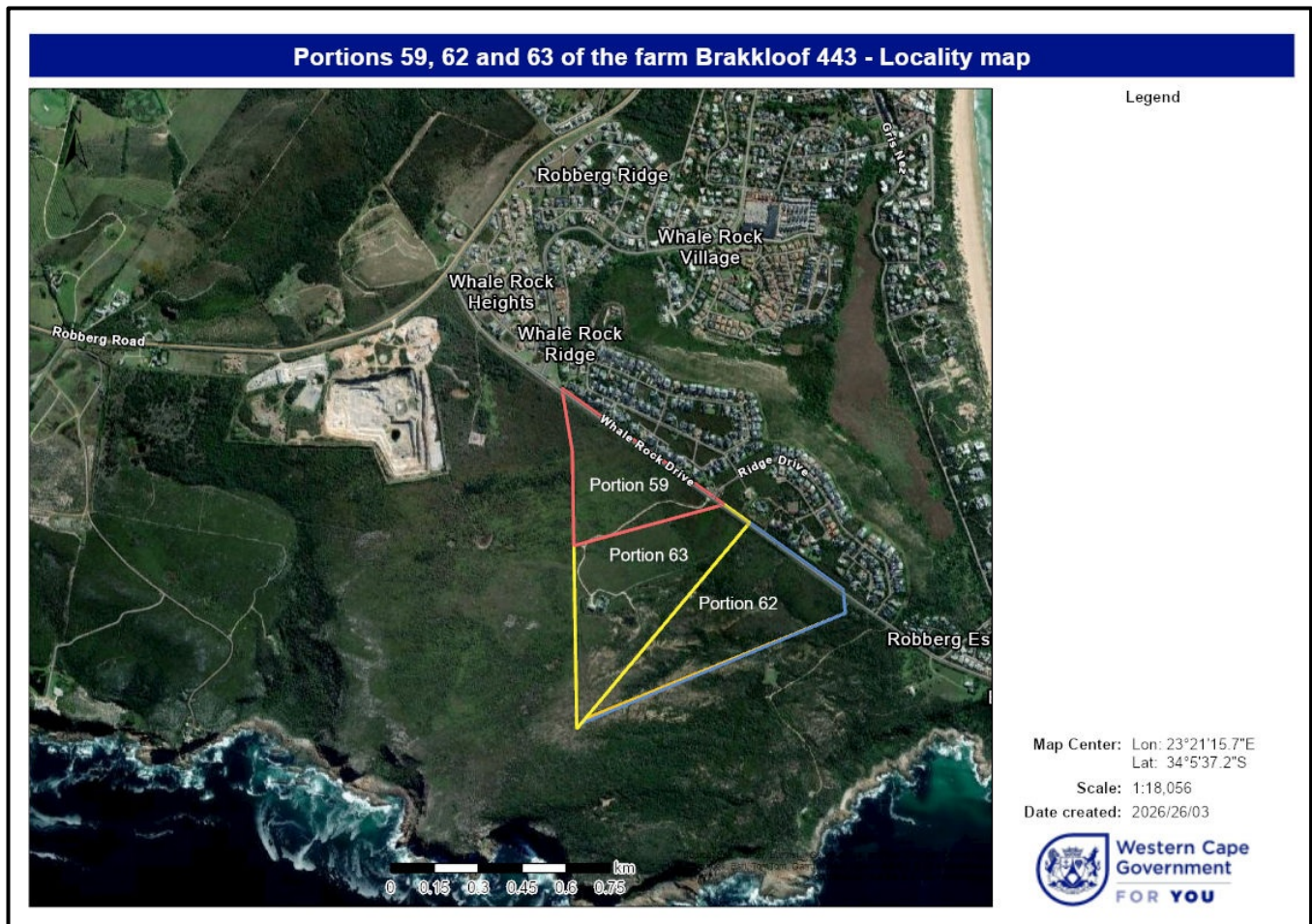
The Protocols must be complied with for every new application for Environmental Authorisation (EA) that is submitted after 9 May 2020. According to the Protocols, the EAP must verify the current use of the site in question and its environmental sensitivity as identified in the screening tool to determine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

# 2. PROPERTY BACKGROUND / LOCATION INFORMATION

The three properties are located to the south of Plettenberg Bay, within the Bitou Municipal Area, immediately to the south of the Whale Rock residential estate. The site is situated outside the defined urban edge but directly abuts established urban development.

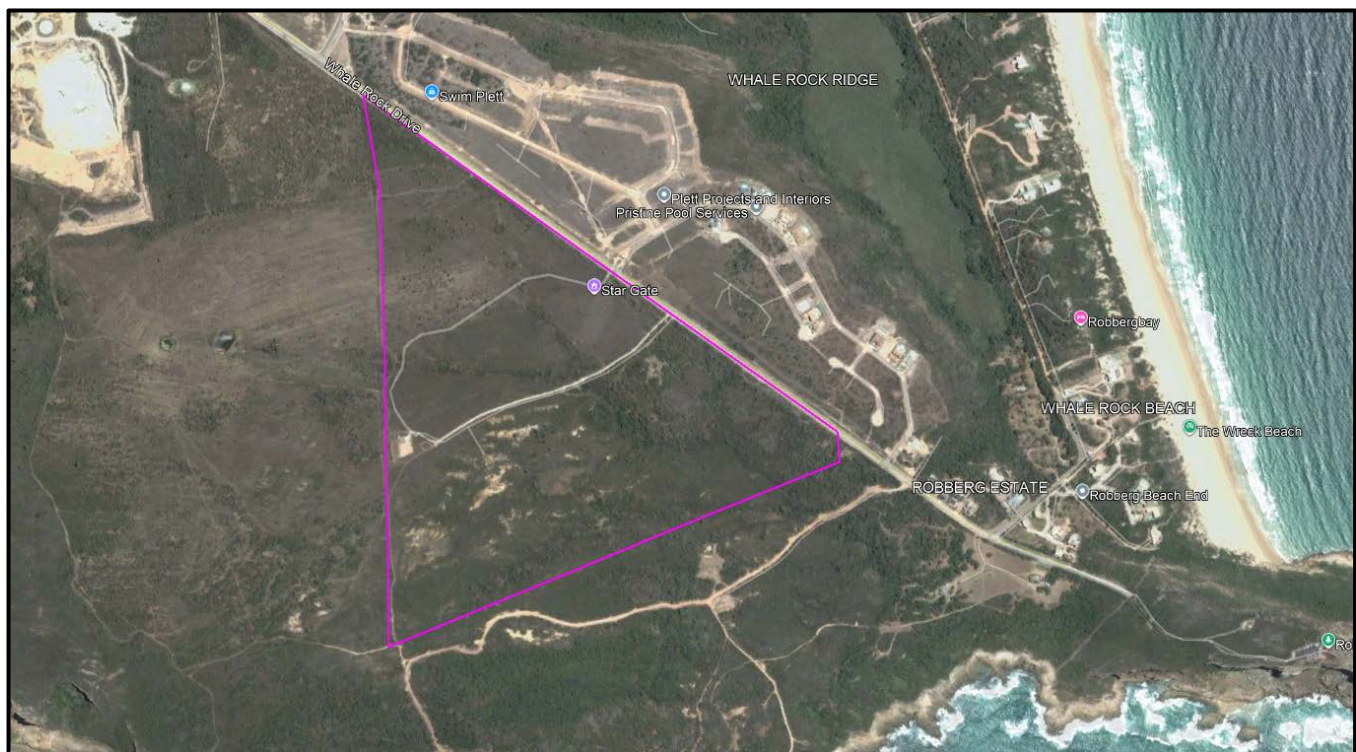
The surrounding area is characterised by high-value residential development to the north, and environmentally sensitive and undeveloped land forming part of the Robberg Coastal Corridor (including the Robberg Nature Reserve to the south, east and west).

Portion 59 was historically used in part for agricultural cultivation, while Portions 62 and 63 were previously disturbed through gravel extraction and the sourcing of road construction material. The current owners acquired the properties in 2014 and subsequently constructed a dwelling house with associated outbuildings on Portion 63.

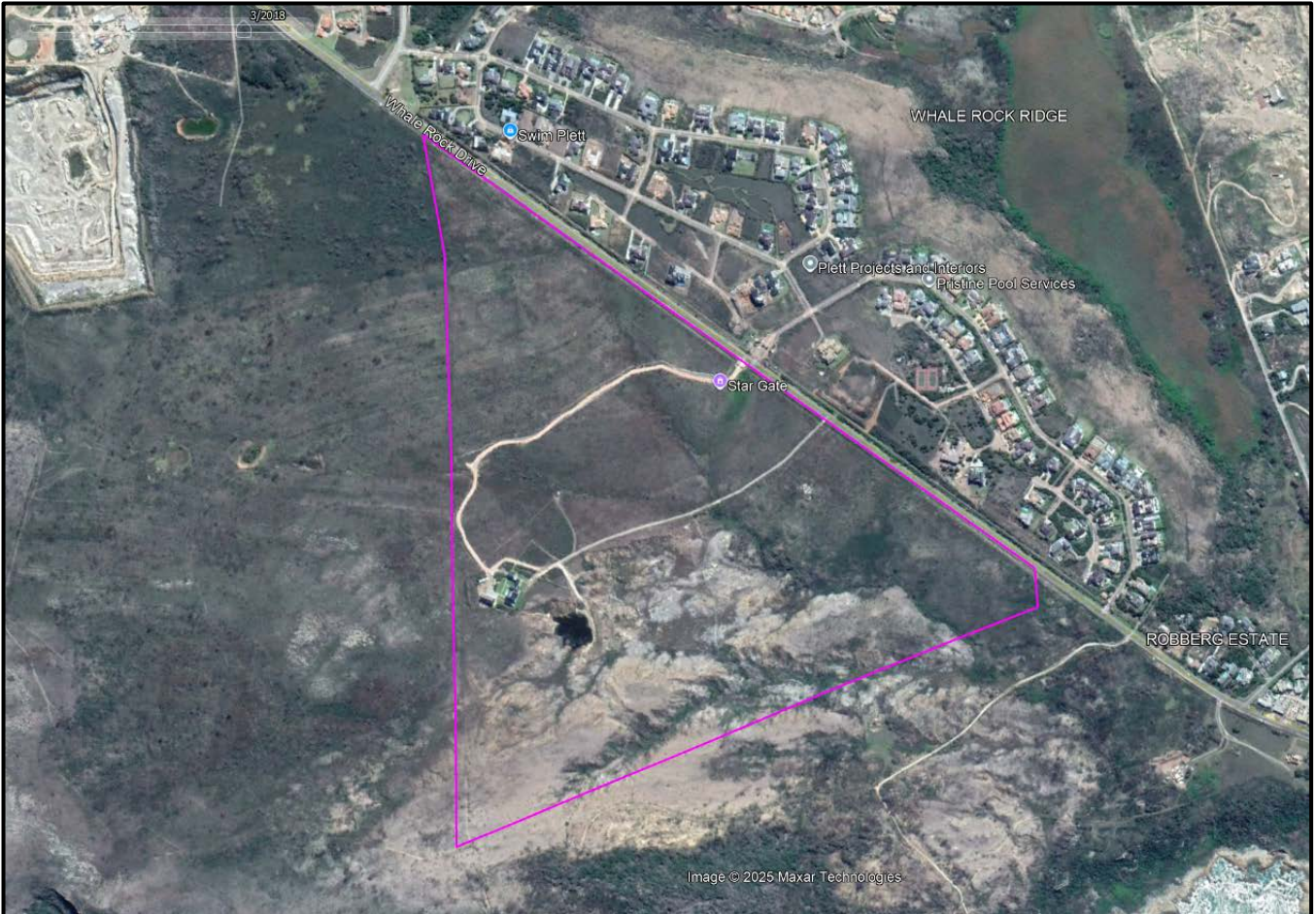


**Figure 1: Locality map for Portions 59, 62 and 63 of farm Brakkloof 443**

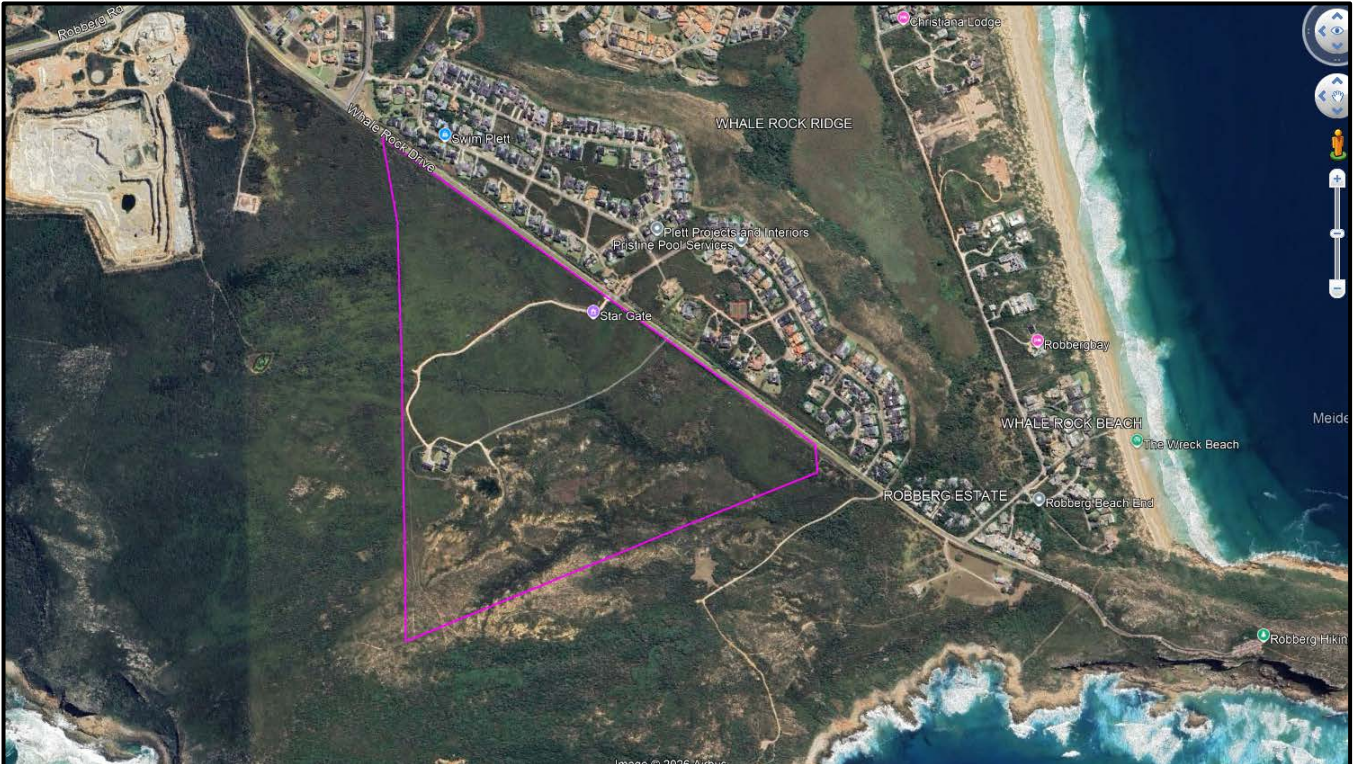
Aerial photos accessed from Google earth shows that very little has changed on the site since 2004, except for the house that was built before 2016.



**Figure 2: Google Earth aerial photo of 2004 showing remnants of agricultural activities on Portion 59**



**Figure 3: Google Earth aerial photo of 2019 – showing the devastation effect of a large-scale fire on the southern section of the properties**



**Figure 4: Google Earth aerial photo of 2025**

### 3. PROPOSED DEVELOPMENT ACTIVITIES

Portion 59 is currently vacant undeveloped land and it is proposed to develop a **Retirement Complex**, comprising approximately **120 residential units** with unit sizes ranging between 200 m<sup>2</sup> and 300 m<sup>2</sup>. Portion 63 has an existing dwelling and a shed (that will be excluded from the proposed development), but the rest of this portion is also undeveloped. Portion 62 is vacant and undeveloped land that was historically used for a quarry for road building and it is proposed to develop a **Museum of Mankind** on the north eastern boundary, supported by compatible tourist-oriented facilities for education, conferencing and accommodation components. The remainder of Portions 62 and 63 will be included in the Robberg Coastal Corridor (RCC).

Portion 59: The objective of this zone is to encourage residential development of a medium density, with a coordinated design, and to accommodate group housing where special attention is given to aesthetics, architectural form and the inter-relationship between components of the group housing scheme. The primary use in this zone is “**Group/town housing**” specifically as a Retirement Complex.

Portions 62 and 63: To facilitate the protection of the natural landscape it is proposed that Portion 62 and 63 which belong to the same owner, be rezoned to “Open Space III” (Nature conservation area). The objective of this zone is to provide for the conservation of natural resources in areas that have not been proclaimed as nature areas (non-statutory conservation), in order to sustain flora and fauna and protect areas of undeveloped landscape. The owner of the land parcels is also in the process of incorporating these two portions into the Robberg Coastal Corridor (Figure 4).

“**Nature Conservation Area**” is the primary use in this zone and is described as “the use and management of land with the objective of preserving the natural biophysical characteristics of that land, including the fauna and flora”.

A range of consent uses is provided to supplement and support the main objective of this conservation zone. These include:

- Conference and Environmental facilities
- Freestanding base telecommunication station
- Function venue, Tuck shop and Utility service
- Holiday accommodation and Tourist facilities with a Wellness centre

Most of the three portions is classed as Critical Biodiversity Area (CBA) which is defined as areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. The main objective of a CBA area is to maintain it 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.

Taking the CBA into consideration a low impact route was followed during the planning stages of the proposed development in order to have the **least impact on the receiving environment**.

# DIAGRAM 6: DEVELOPMENT FOOTPRINT & CONSTRAINTS PLAN

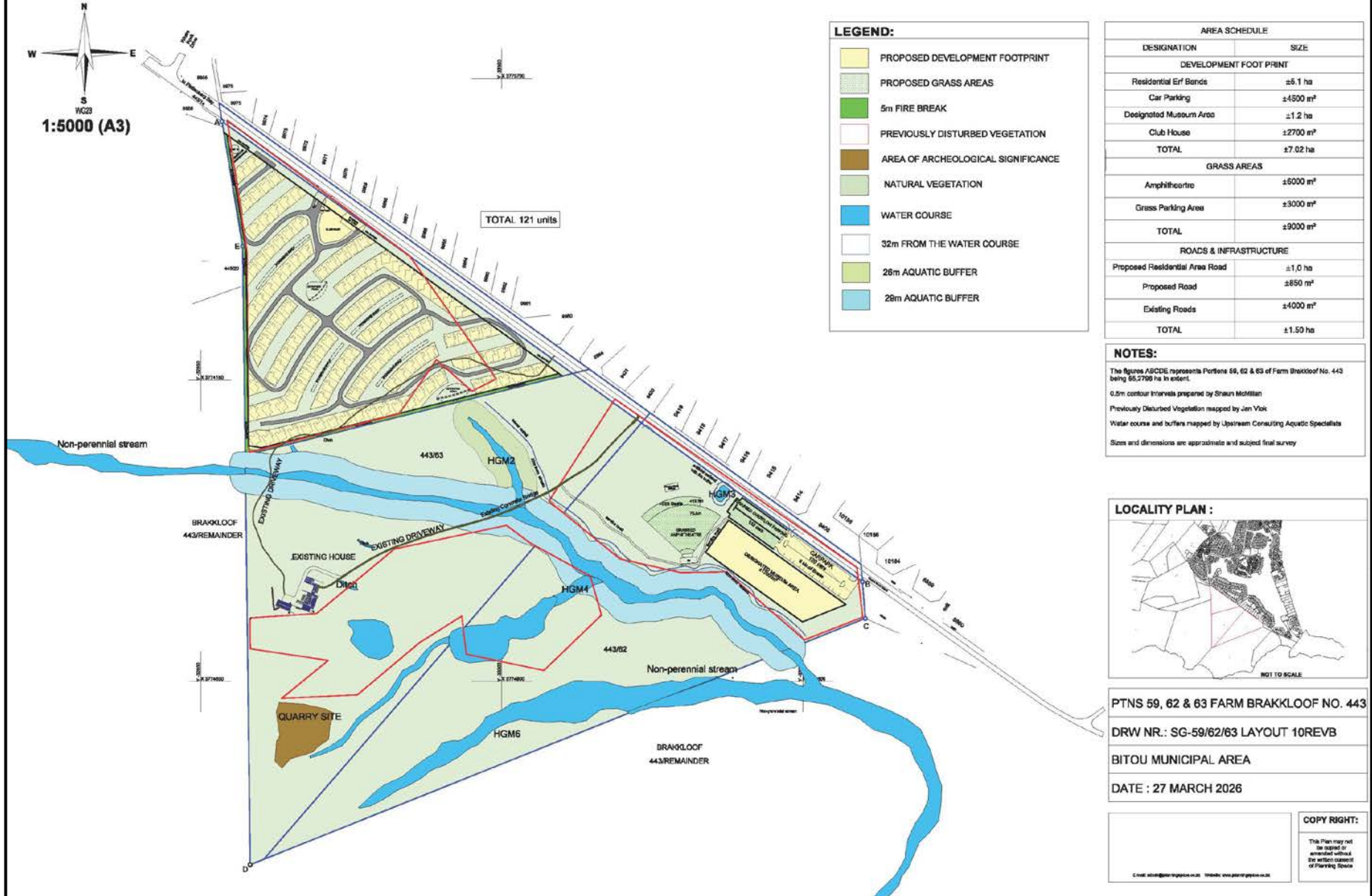


Figure 5: Proposed Site Development Plan (Planning Space, March 2026)

## 4. ENVIRONMENTAL CONSIDERATIONS

### 4.1 Ecological Threat Status

According to the SANBI red list of threatened ecosystem status, Portions 62 and 63 is mapped to include the Endangered Garden Knysna Sand Fynbos and Portion 59 falls mostly in the Least Threatened South Outeniqua Sandstone Fynbos. The property also falls within the Outeniqua Strategic Water Source area according to the National Screening Tool Report.

The Fauna and Flora reports respectively found that the vegetation of the proposed development footprint area represent only South Outeniqua Sandstone Fynbos that is classified as Least Threatened and there were no SCC species found within these areas. **The classification of Critical Biodiversity areas as a result of the CR Knysna Sand Fynbos in the footprint areas is therefore disputed.**

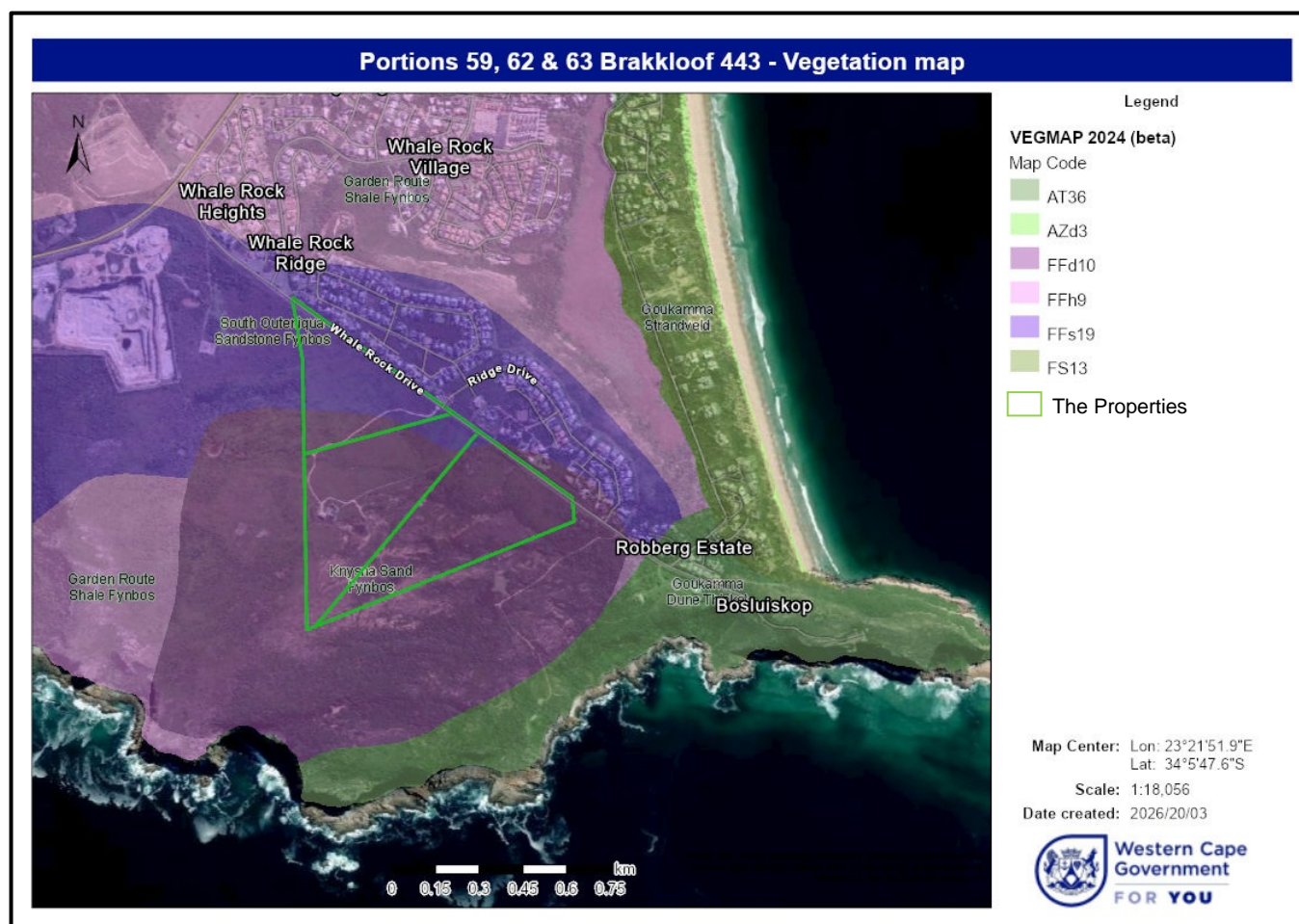
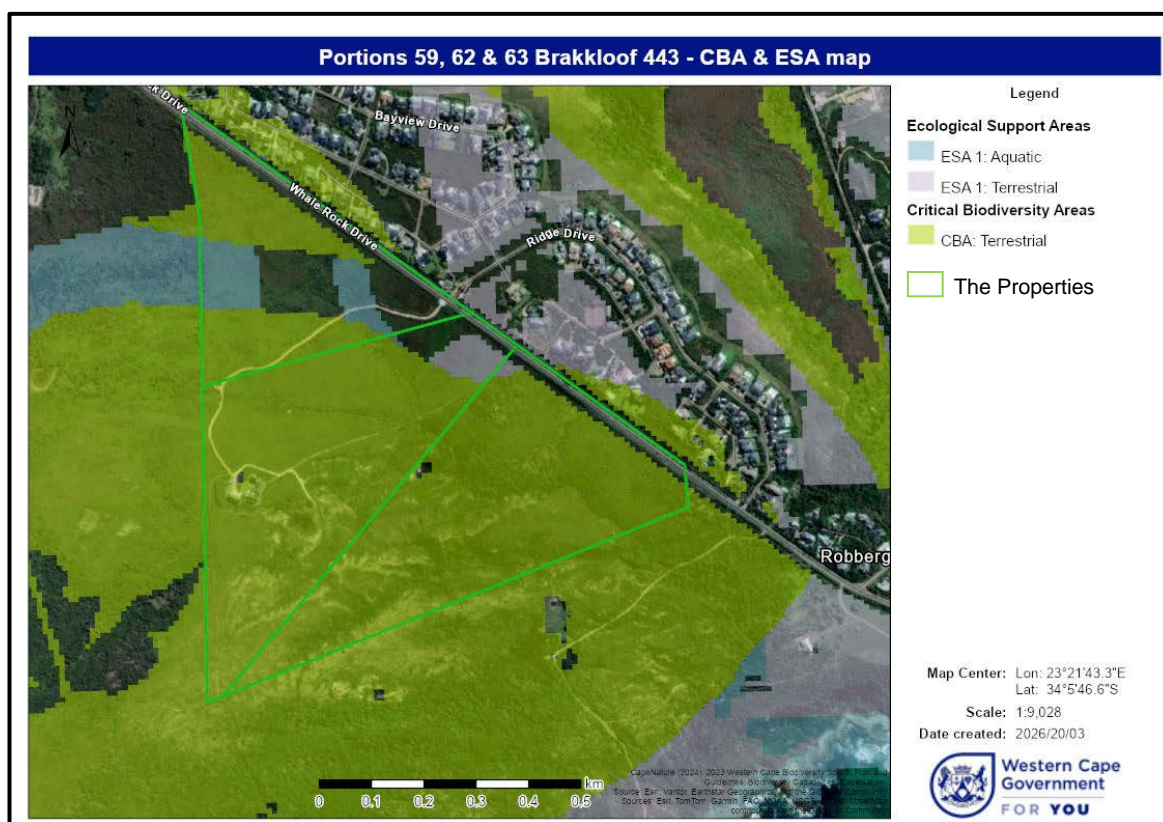


Figure 6: Vegetation map 2024 – Garden Route Granite Fynbos

## 4.2 Critical Biodiversity Areas

The Western Cape Biodiversity Spatial Plan, 2023 identifies most of the study site as terrestrial Critical Biodiversity Areas (CBAs), including areas classified as CBA 1 (maintain), CBA 2 (restore), ESA 1 (Aquatic) and ESA1 (Terrestrial). These designations reflect the ecological importance of the site and surrounding landscape at a regional scale as a result of the mapped Critically Endangered Knysna Sand Fynbos.

The Fauna and flora reports respectively found that the vegetation of the proposed development area represent South Outeniqua Sandstone Fynbos that is classified as Least Threatened and there were no SCC species found within these areas. The Aquatic studies found that the Aquatic ESA mapped on the WCBSP is wrong as there is no aquatic water source identified in that area from site surveys. **The classification of Critical Biodiversity areas as a result of the CR Knysna Sand Fynbos and Aquatic ESA are therefore disputed.**



**Figure 7: Ecosystem Threat Status as determined by the WCBSP, 2023**

Category 1:	CBA: Terrestrial
Category 2:	CBA: Threatened Ecosystem (Knysna Sand Fynbos)
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.

Category 1:	ESA 1: Aquatic (Surface water source)
Category 2:	ESA 1: Terrestrial (Coastal Corridor)
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:	Maintain in a functional, near-natural state. Some habitat loss is acceptable, provided the underlying biodiversity objectives and ecological functioning are not compromised.

### 4.3 Aquatic resources

Review of available National Geo-spatial Information (NGI) and Department of Agriculture, Land Reform and Rural Development (DALRRD) as well as the Department of Water and Sanitation (DWS) datasets indicates that there are some non - perennial watercourses running through the center of Portions 62 and 63 and an artificial wetland on the boundary next to Whale Rock Drive (as a result of stormwater from the north).

An aquatic specialist study delineated the aquatic watercourses and determined buffers for the non-perennial rivers. They confirmed that the proposed development falls outside the buffer zones of these watercourses and will have limited impact on them, but these can be mitigated.

Cape Farm mapper with all the relevant datasets mapped a small area on the western boundary of Portion 59 as Outeniqua Strategic Water Source area for groundwater, but the Aquatic specialists confirmed that there are no groundwater sources in the vicinity of the SWSA and that the mapping is as a result of broad scale regional mapping and not relevant to the study site.

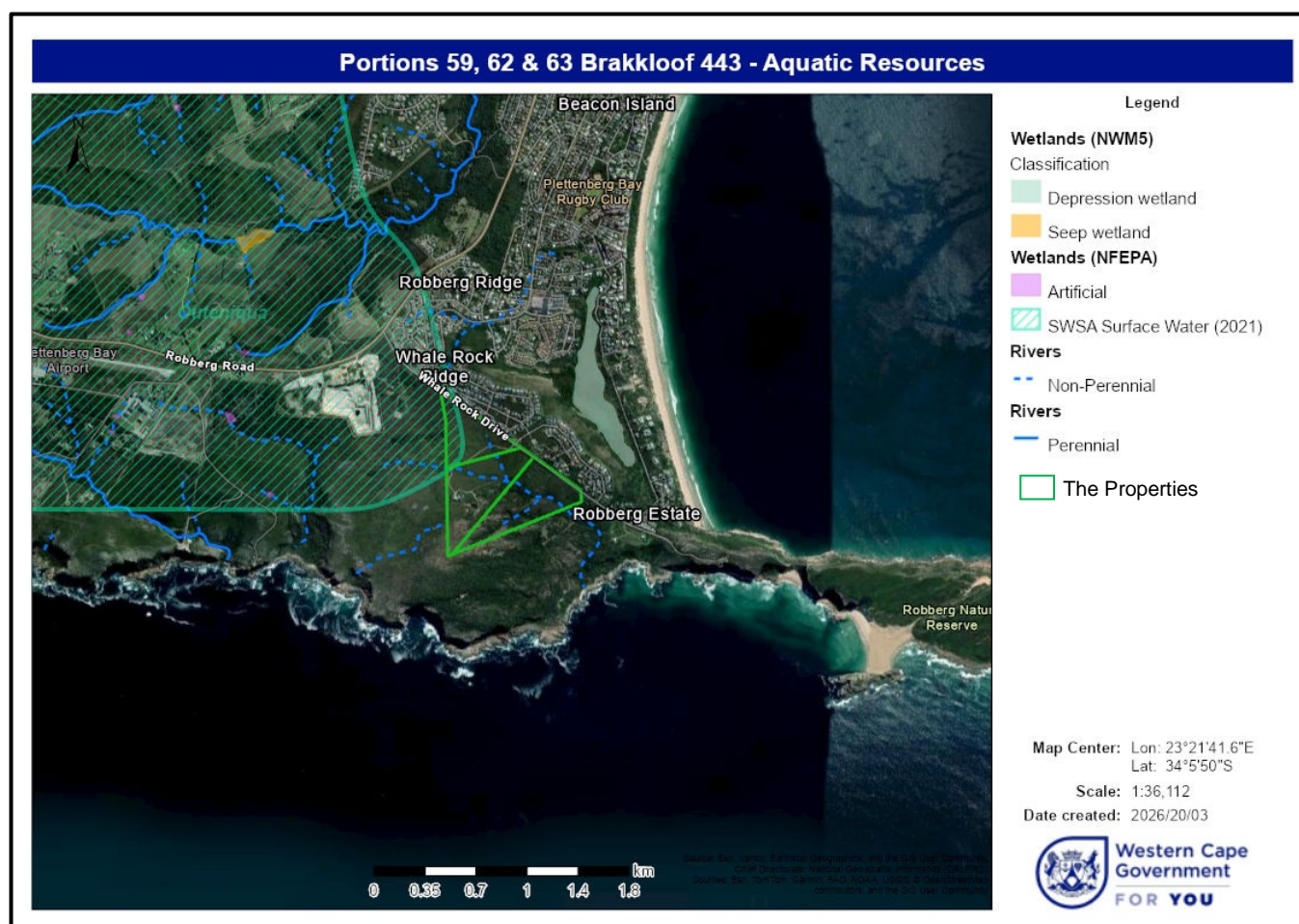


Figure 8: Water resources according designated by Geo-spatial Information (NGI) of the Department of Agriculture, Land Reform and Rural Development (DALRRD)

### 4.4 Protected Areas

The properties are shown to be located within the Garden Route National Park buffer zone according to the Western Cape Biodiversity Spatial Plan, 2023 and approximately 650m from the Robberg Nature Reserve.

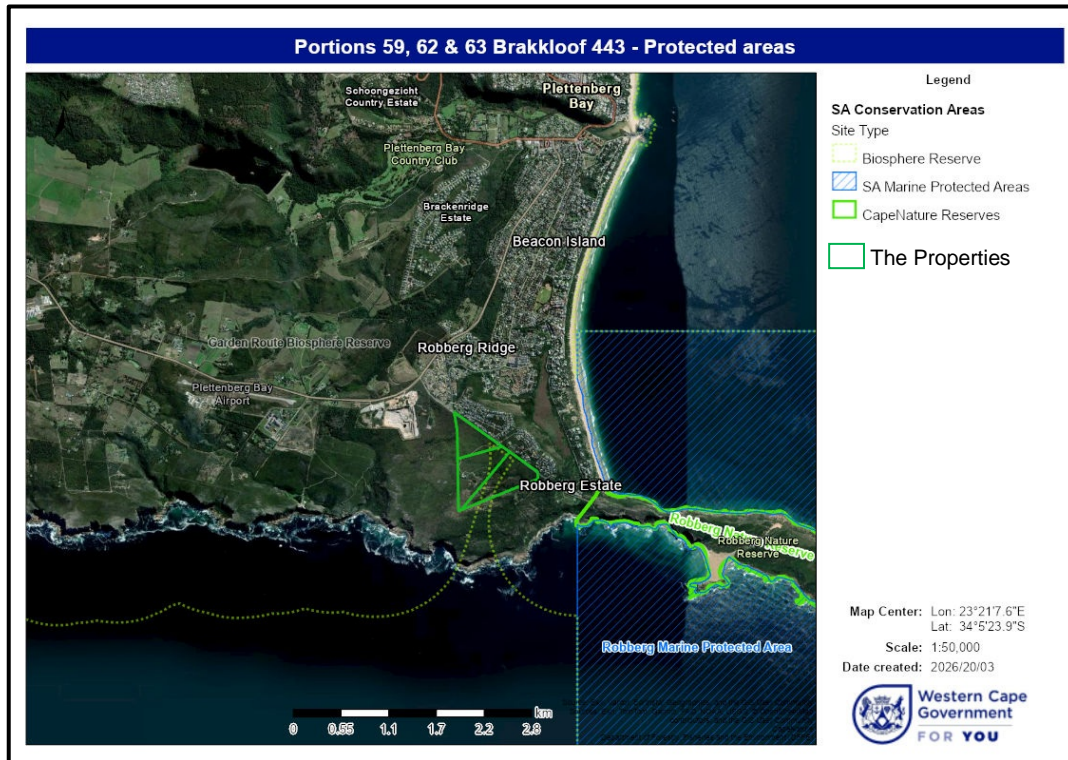


Figure 9: Protected Areas.

#### 4.5 Topography

The landform is characterised by a broad, shallow basin situated near the centre of the combined properties, surrounded by gently undulating terrain. The site is situated between 70 to 100m above sea level. The surrounding slopes drain radially toward this central low point, forming a localised catchment. This basin corresponds with an area historically disturbed by sand and gravel extraction and now functions as a seasonal stormwater accumulation zone. From this depression, surface runoff is conveyed via a defined non-perennial drainage channel that exits the site to the south-east toward the coastal zone.

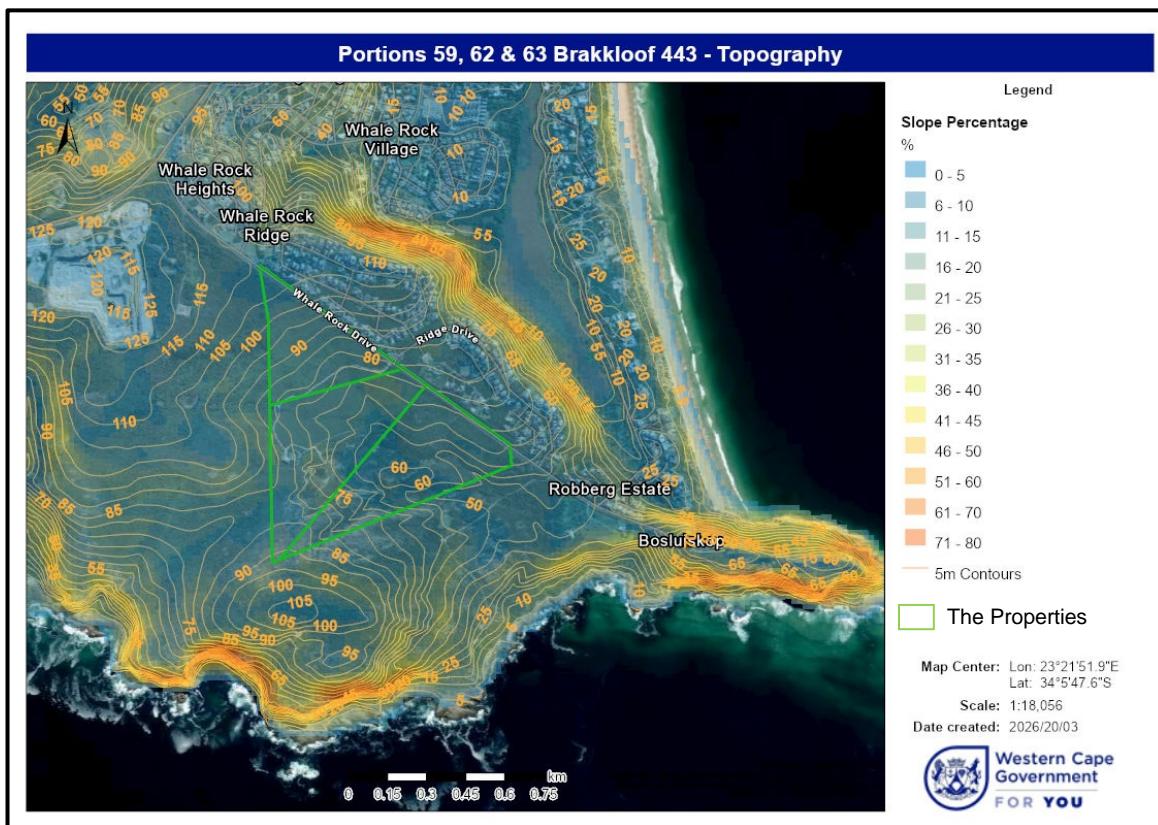


Figure 10: Topography of the site

## 5. ENVIRONMENTAL SCREENING RESULTS AND ASSESSMENT OUTCOMES

A Department of Forestry, Fisheries, and the Environment (DFFE) national web-based screening tool was generated (2 June 2025) to review the environmental sensitivities for **Transformation of land from Indigenous vegetation**. The screening report list a variety of specialist studies to be undertaken based on the data informants of the tool at the study area.

### 5.1 Relevant Development Incentives, Restrictions, Exclusions or Prohibitions

The properties are located within the **Garden Route National Park (GRNP) Buffer zone**, a critical biodiversity area, and the protected area expansion footprint. SANParks will be consulted during the Public Participation process.

### 5.3 Environmental Sensitivities

The following sensitivities are related to the property (National Screening Tool Report – Appendix E) -

**Table 1: Environmental sensitivities**

Theme	Very High	High	Medium	Low
Agriculture theme		X		
Animal Species		X (inaccurately reported for the footprint area)		X (for the footprint area)
Aquatic Biodiversity	X			
Archaeological and Cultural heritage		X		
Civil Aviation		X		
Defense theme				X
Plant Species			X (inaccurately reported for the footprint area)	X (for the footprint area)
Terrestrial Biodiversity	X			X (for the footprint area)

### 5.4 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 studies 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	Specialist Assessment
6	Socio-Economic Assessment	General
7	Plant Species Assessment	Specialist Assessment
8	Animal Species Assessment	Specialist Assessment

## 6. 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
- Specialist input

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.

**Jan Vlok from Regalis Environmental** conducted a flora assessment of the property in 2009 that determined an area for potential development where the property was transformed by historical activities on site and modified by alien invasive plant species, agricultural ploughing and quarrying activities for the road. This study was the basis for the design layout of the proposed development as well as for a Planning application to reduce restrictions on the site to ensure that the proposed development stay within the least environmentally sensitive area on site. He updated his report in 2026 and determined that the vegetation has a **low** sensitivity for the proposed development footprint areas and disputed the classification of "Very high" for Terrestrial Biodiversity and "**Medium**" for Flora biodiversity. See Appendix N for the Flora report of 2009 (updated in 2026).

### Agriculture:

The proposed footprint area has been mapped to be of medium - high agricultural value (Figure 10). But the screening tool has generated a wrongful sensitivity for the proposed development area as the areas identified as high were previously old quarries with archaeological artefacts or areas not suitable for ploughing or other farming activities. Portion 59 was historically ploughed but this stopped before 2004 and the vegetation re-established as secondary growth. Soil ZA will compile a Compliance Statement for low or medium sensitivity.

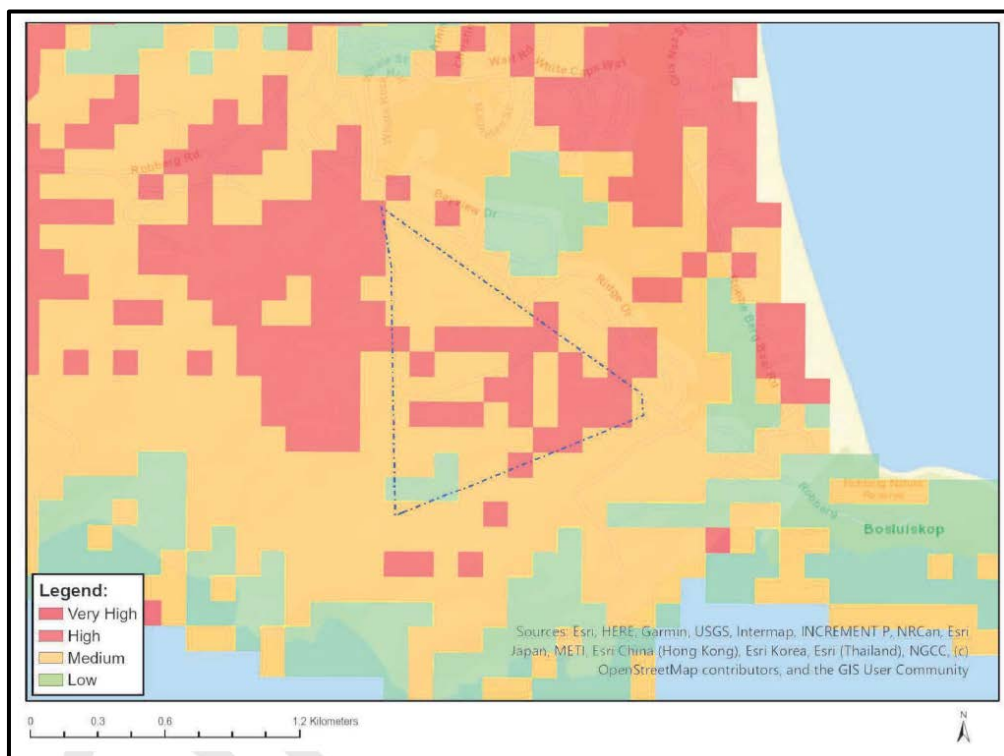


Figure 11: Map of relative agriculture theme sensitivity

## 6.1 Reason for not including specialist studies or impact assessments

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 serves as reasoning for including / not including specialist input related to the proposed development.

**Table 3: Verification of included specialist input related to the proposed development**

No	Identified Specialist assessments	EAP Response on applicability
1	Visual Impact Assessment	A Visual impact assessment will be commissioned from Paul Buchholz.
2	Archaeological and Cultural Heritage Impact Assessment	The screening report indicates that the receiving environment has a HIGH Relative Archaeological & Cultural Heritage Sensitivity.  A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act was submitted to Heritage Western Cape. They requested a Heritage Impact Assessment that include the proposed development.
3	Palaeontological Impact Assessment	The screening report indicates that the receiving environment has a Low Relative Palaeontological Sensitivity.  A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act was submitted to Heritage Western Cape. They requested a Heritage Impact Assessment that include the proposed development.
4	Terrestrial Biodiversity Impact Assessment	Terrestrial Biodiversity Impact Assessment or Compliance Statement is required as the property falls within a Critical biodiversity area. <b>This assessment will be dealt with in the Fauna and Flora assessments.</b>  <b>The classification of “Very high” is disputed by the Fauna and Flora specialist reports.</b>
5	Aquatic Biodiversity Impact Assessment	The screening report indicates that Aquatic resources have a <b>Very High Sensitivity</b> on the site. The Screening tool highlighted that only a very small section of the site falls within the Outeniqua Strategic Water Source Area – which has very high rating. An Aquatic Biodiversity Impact Assessment was done and determined that there are non-perennial rivers mapped on site, but the Outeniqua SWSA will not be impacted as the mapping is inaccurate.
6	Socio-Economic Assessment	The properties are situated outside the urban edge of Plettenberg Bay, but directly south of built-up areas. Rezoning applications will be submitted to the Bitou Municipality. The Socio-Economic assessment can be dealt with in the Town planning report.  <b>Disputed</b>

7	Plant species assessment	<p><b>Inaccurately depicted.</b> A Compliance Statement is required for “medium” sensitivity. <b>Jan Vlok</b> conducted a specialist study and mapped areas with modified vegetation that is suitable for the proposed development and classified these areas as of “Low” sensitivity.</p> <p><b>Disputed</b></p>
8	Animal species assessment	<p><b>Inaccurately depicted</b> according to the Fauna specialist for the proposed development areas. Dr Jaco Visser classified the fauna sensitivity on the proposed development areas as “low” and impacts related to the proposed development can be mitigated through the footprint placement and other measures.</p> <p><b>Disputed</b></p>

## 7. CONCLUSION

This Site Sensitivity Verification Report has been prepared in accordance with the National Environmental Management Act (Act No. 107 of 1998), the Environmental Impact Assessment Regulations, 2014 (as amended), and the Procedures for Site Sensitivity Verification (GN 320 of 2020). The purpose of this report was to verify the environmental sensitivities identified by the National Web-Based Environmental Screening Tool for the Proposed Residential Development on Portion 15 of Farm 216 Uitzicht.

The Screening Tool identified a range of environmental themes with elevated sensitivities, particularly in relation to Terrestrial Biodiversity, Aquatic Biodiversity, Plant Species and Animal Species. Through a combination of desktop analysis, site inspections, specialist input, and contextual review of adjacent municipal specialist studies, these sensitivities were ground-truthed and refined where appropriate.

The assessment concludes that the site falls within the Garden Route National Park Buffer zone and an area classified as a Critical Biodiversity area. The proposed development would require Environmental Authorisation through a Basic Assessment process prior to implementation. Please find the National Screening Tool Report for the study site in **Appendix E**.

No fatal environmental flaws have been identified that would preclude the proposed development from proceeding through the Basic Assessment process. Subject to the completion of specialist studies identified and implementation of recommended mitigation measures by the specialists. With adherence to applicable environmental legislation, the proposed development is considered environmentally acceptable within the context of its verified site sensitivities.