

Cape \mathcal{EAP} rac

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26 August 2021

Our Ref: GEO656/04

DEA&DP Ref: M/3/6/5

RE: SITE SENSITIVITY VERIFICATION REPORT FOR PART 2 AMENDMENT APPLICATION FOR PORTINS 130, 131 & 132 OF FARM 208 GWAYANG, GEORGE

On 20 March 2020 the Minister of Forestry, Fisheries and the Environmental published the general requirements for undertaking site sensitivity verification for environmental themes for activities requiring environmental authorisation (Government Gazette No. 43110). In terms of these requirements, prior to commencing with a specialist assessment, the current land use and environmental sensitivity of the site under consideration by the screening tool must be confirmed by undertaking a site sensitivity verification.

The report uses national datasets to identify site sensitivities and potential specialist studies that may be required for any particular development. Since the datasets are not necessarily ground truthed, there may be instances where the required specialist study is in actual fact not necessary.

Prior to commencing with a specialist assessment, the current use of the land and the environmental sensitivity of the site under consideration identified by the screening tool must be confirmed by the undertaking a **site sensitivity verification**. According to the Assessment Protocol for specialist involvement, If any part of the proposed development falls within an area of 'high" or "very high" sensitivity, the requirements prescribed for such sensitivity must be followed.

According to the Screening Tool Report that was run on 10 June 2021, the following summary of the development footprint environmental sensitivities is identified. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

It must be noted that this application is for a **Part 2 Amendment** of the existing, valid Environmental Authorisation (EA) which has already undergone an Environmental Impact Assessment process and specialist study. The amended footprint is located on the previously approved footprint although certain land uses are being amended.

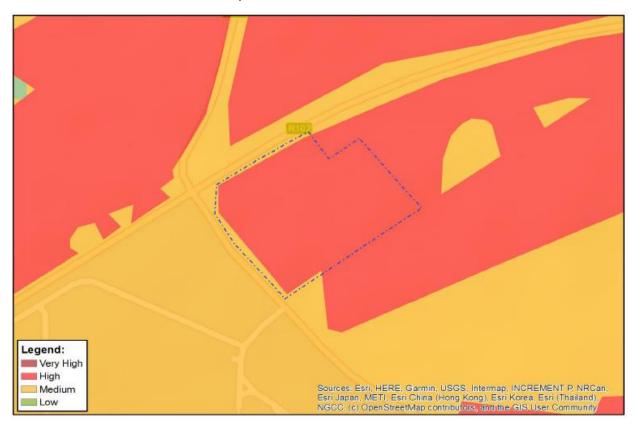
Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme		X		

Aquatic Biodiversity Theme	X		
Archaeological and Cultural			X
Heritage Theme			
Civil Aviation Theme	X		
Defence Theme			X
Plant Species Theme		X	
Terrestrial Biodiversity Theme	X		

Below is confirmation of the studies required for the Amendment based on the sensitivity themes identified above.

Agriculture (High Sensitivity)

The Screening Tool identifies the agricultural sensitivity as High due to a portion of the proposal falling within the estimated land capability of the site. The properties have been subdivided from the original property unit and rezoned out of Agriculture use. Although the current land use is for grazing, this is an interim measure until the development can be finalised.



The land capability layer as used in the Screening Tool does not take into account any urban delineation or rezoning that has been applied to the properties, and has to take into account **high value agricultural land** that can be preserved for **continued agricultural production** thus ensuring long term national food security. These properties do not quality in this respect, particularly as they have already gone through a subdivision process that involved the Department of Agriculture.

Layer Information

Title

Land Capability (DAFF 2016)

Description

The Land Capability (2016) represents the distribution of the land capability evaluation values in the country, used as one of the input data layers to determine and demarcate all high value agricultural land for ensuring that these areas, pending availability, are preserved for continued agricultural production, thereby ensuring long-term national food security. The data layer is a seamless data layer and does not exclude permanently transformed areas (built up; waterbodies; mining etc.)

Land capability is defined as the most intensive long-term use of land for purposes of rainfed farming determined by the interaction of climate, soil and terrain. Land capability should not be seen as a substitute for the interpretation designed to show land suitability or agricultural potential.

The approach to the refinement of the 2016 Land capability data layer was based on a spatial modelling exercise and verified through actual in-field verification processes and local level soil assessment data.

The Land capability evaluation 2016 data layer is a refined and updated spatial modelled data layer depicting the land capability evaluation values for the country. The main contributing factors towards land capability in a "natural or unimproved "rainfed (dryland) scenario, were the soil, climate and terrain capabilities with a weighted reference of:

Soil capability = 30%; Climate capability = (40%) and Terrain capability = (30%).

Source

Department of Agriculture, Forestry and Fisheries (DAFF)

Type

Raster Layer

Comment will be requested from the provincial Department of Agriculture.

No additional Agriculture studies are being considered.

Animal Species (High Sensitivity)

The screening tool identified the sensitivity for animal species (fauna) as "high" for the following species:

Sensitivity	Feature(s)
High	Aves-Circus ranivorus
High	Aves-Neotis denhami
High	Aves-Campethera notata
High	Aves-Bradypterus sylvaticus
Medium	Invertebrate-Aneuryphymus montanus
Medium	Sensitive species 5
Medium	Amphibia-Afrixalus knysnae

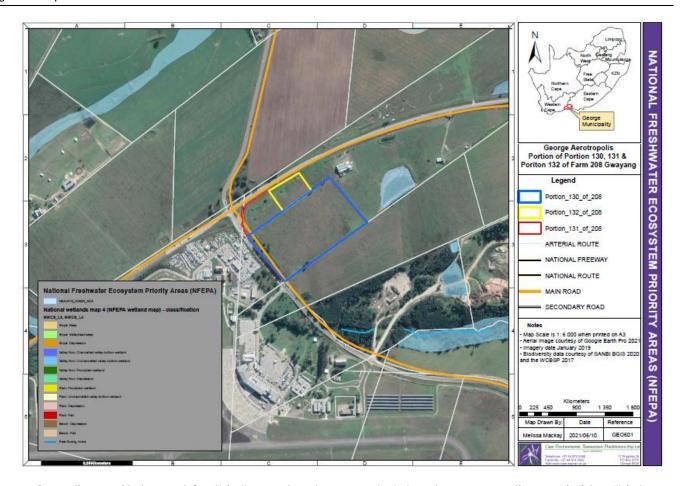
The development of this area has already been authorised and as such the applicability of this theme relates to the amendment only. The amendment area in terms of clearance of the property and transformation will be the same as that already authorised.

An updated Compliance Statement for botanical and terrestrial biodiversity is being undertaken that will speak to the change of habitat on the site. The impact thus on faunal will be the same as that already approved.

No faunal assessment is thus envisaged.

Aquatic Biodiversity (Very High Sensitivity)

The screening tool identified the aquatic biodiversity theme as "very high" due to it being in a strategic water source area. There are no watercourses or wetland on the site and as such there was no previous aquatic investigation associated with the initial EIA.



A Compliance Statement for this theme has been undertaken by an aquatic specialist. This has determined that no aquatic impact assessment is necessary as the development does not impact on water resources.

Archaeological & Cultural Heritage (Low Sensitivity)

The screening tool identified this them as being "low". During the previous EIA process, it was confirmed that Section 38 of the NHRA was not applicable. The development is in keeping with the built environment as envisaged for the airport support zone. The EA approved the footprint of the development in totality.

The proposed amendment does not change the area to be developed, and the same conditions apply. No further studies will be undertaken.

Civil Aviation (Very High Sensitivity)

The development is directly associated with the George Airport and has been set aside as an airport support zone. It has been identified as having "Very High" sensitivity due to its proximity to the airport. The properties are not located in the area directly in line with the runway.

Any development will require an obstacle authorisation from the CAA if it triggers the obstacle collision / potential hazard requirements as set out by the CAA, i.e.

- Buildings or other objects which will constitute an obstruction or potential hazard to aircraft
 moving in the navigable air space in the vicinity of an aerodrome, or navigation aid, or which
 will adversely affect the performance of the radio navigation or instrument lading systems,
- There are no buildings or objects higher than 45 metres above the mean level of the landing area:
- No building, structure or object which projects above a slope of 1 in 20 and which is within 3000 metres measured from the nearest point on the boundary of an aerodrome;

 No building, structure or other object which will project above the approach, transitional or horizontal surfaces of an aerodrome.

It is not envisaged that any of the facilities that will be located on the properties will trigger the requirements as above. As such it is not necessary to request approval in terms of the Civil Aviation Act for obstacles, however comment will be requested from the Civil Aviation Authority.

Defence (Low Sensitivity)

The screening tool identified this them as being "low". No further studies will be undertaken as the development constitutes an activity inside with an existing EA in place.

Plant Species (Medium Sensitivity)

The screening tool identified this them as being "medium". The development of this area has already been authorised and as such the applicability of this theme relates to the amendment only. The amendment area in terms of clearance of the property and transformation will be the same as that already authorised.

An updated Compliance Statement for botanical and terrestrial biodiversity is being undertaken that will speak to the change of habitat on the site. The impact thus on faunal will be the same as that already approved.

<u>Terrestrial Biodiversity (Very High Sensitivity)</u>

The screening tool identified this them as being "very high", notably for being in an Endangered Ecosystem, Ecological Support Area 2 and a Strategic Water Source Area.

Sensitivity	Feature(s)
Very High	Ecological Support Area 2
Very High	Strategic Water Source Area
Very High	Endangered ecosystem

It must be noted that in 2018 the vegetation types were reassessed and categorised by SANBI, and this area was previously considered to form part of Garden Route Granite Fynbos which is listed as a Critically Endangered ecosystem in 2018. An updated botanical report is being undertaken to confirm if any such vegetation remains on the site given the significant transformation that has taken place over the years.

The aquatic specialist has also confirmed that the development will not impact on any strategic water sources. An updated Compliance Statement for botanical and terrestrial biodiversity is being undertaken that will speak to the change of habitat on the site.

Specialist Assessments

Based on the site sensitives identified, the screening tool identified 13 possible specialist assessments for the development. These are as follows:

- 1. Agricultural Impact Assessment
- 2. Landscape/Visual Impact Assessment
- 3. Archaeological and Cultural Heritage Impact Assessment
- 4. Palaeontology Impact Assessment
- 5. Terrestrial Biodiversity Impact Assessment
- 6. Aquatic Biodiversity Impact Assessment
- 7. Noise Impact Assessment
- 8. Traffic Impact Assessment

- 9. Geotechnical Assessment
- 10. Socio-Economic Assessment
- 11. Ambient Air Quality Assessment
- 12. Plant Species Assessment
- 13. Animal Species Assessment

The site verification per theme as provided above motivates that only the following assessments will be undertaken:

- 1. Botanical / Plant Compliance Statement
- 2. Terrestrial Biodiversity Compliance Statement
- 3. Aquatic Compliance Statement
- 4. Visual Assessment

The proposed amendment to the existing EA retains the same development footprint and as such the impacts will not change from that previously authorised.

Please feel free to contact this office should you require any further information.

Kind regards,

Ms Melissa Mackay

Snr Consultant