



13 July 2021

Our Ref: BIT517/11

DEA&DP Ref: 16/3/3//1/D1/13/0004/18

RE: SITE SENSITIVITY VERIFICATION REPORT FOR PART 2 AMENDMENT APPLICATION FOR ERF 2103 PIESANG VALLEY, PLETTENBERG BAY

On 20 March 2020 the Minister of Forestry, Fisheries and the Environment 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 **24 May 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 a Basic Assessment process and specialist study. The amended footprint is mostly located on the previously approved footprint and portions of the valid EA, particularly those associated with the marine wetland area have already been implemented.

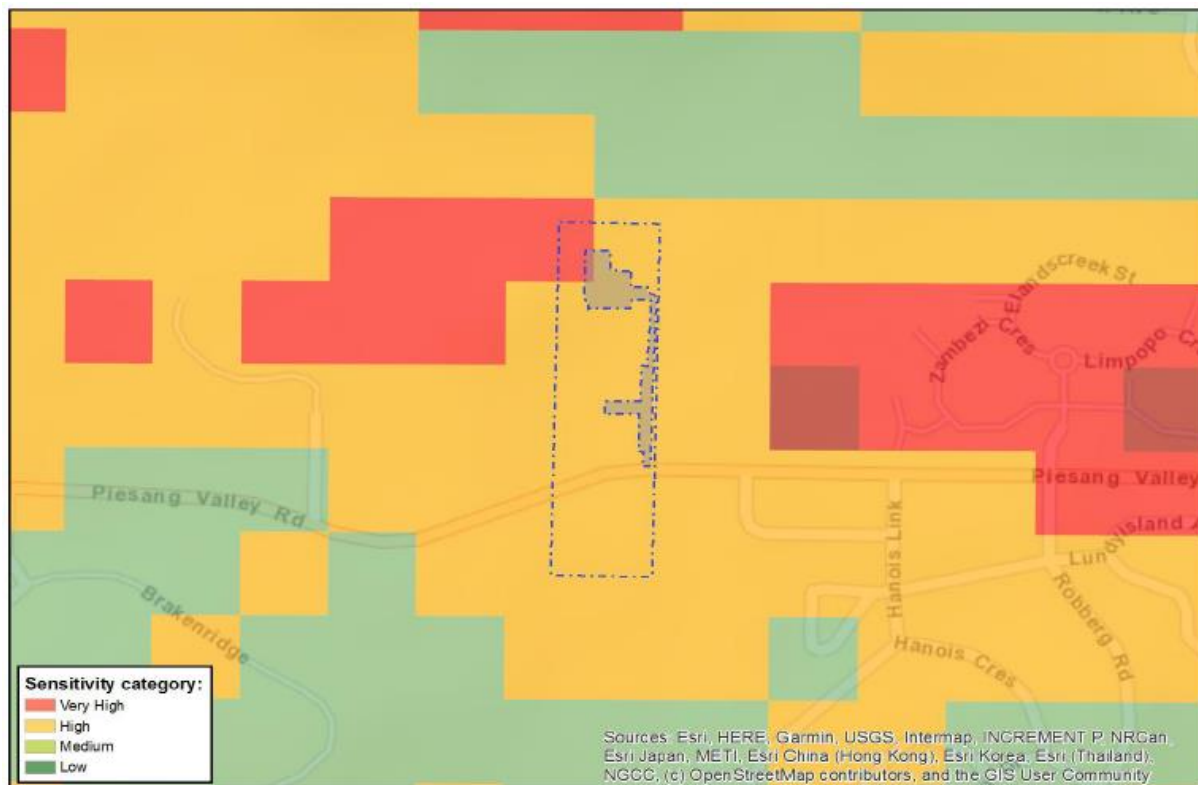
Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme			X	

Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme	X			
Civil Aviation Theme		X		
Defence Theme				X
Paleontology 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 property is zoned for Agriculture and was previously used for grazing of horses, however it is inside the urban edge and the authorised EA has conferred a residential dwelling in this area. The previous EIA process also provided for the rehabilitation of all areas not in use for grazing which further does not support any formal agricultural activities on this property.



Comment will be obtained from the provincial Department of Agriculture, although the department did not comment on the previous EIA process. No rezoning is being considered.

No Agriculture studies are being considered.

Animal Species (Medium Sensitivity)

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

Sensitivity	Feature(s)
Medium	Invertebrate-Aneuryphymus montanus
Medium	Invertebrate-Sarophorus punctatus
Medium	Mammalia-Chlorotalpa duthieae
Medium	Reptilia-Tetradactylus fitzsimonsi
Medium	Sensitive species 5
Medium	Amphibia-Afrixalus knysnae

The upgrade of the marine wetland, buffer on the Piesang River and the retention of indigenous vegetation outside of the development area provides sufficient habitat for the species. This was confirmed in the previous EIA process and is retained in this application. The Marine Wetland Assessment confirms that the improvement of the remnant tidal channel improves the water quality and habitat of this environment.



Photo 1: Remnant tidal channel showing improved tidal movement

No faunal assessment are thus envisaged.

Aquatic Biodiversity (Very High Sensitivity)

The screening tool identified the aquatic biodiversity theme as “very high” due to it being an estuary and a wetland environment. The impact of the development footprint was previously assessed and rated and subsequently approved by DEA&DP.

An updated Wetland Assessment has been undertaken to consider the impacts of the amended layout. It must be noted that the recommendations provided during the previous EIA by the specialist were implemented and as a result there is a distinct improvement in the functioning of the remnant tidal channel.



Photo 2: Upgraded culvert as recommended during the previous EIA



Photo 3: Evidence of improved tidal movement through the culvert

Archaeological & Cultural Heritage (Very High Sensitivity)

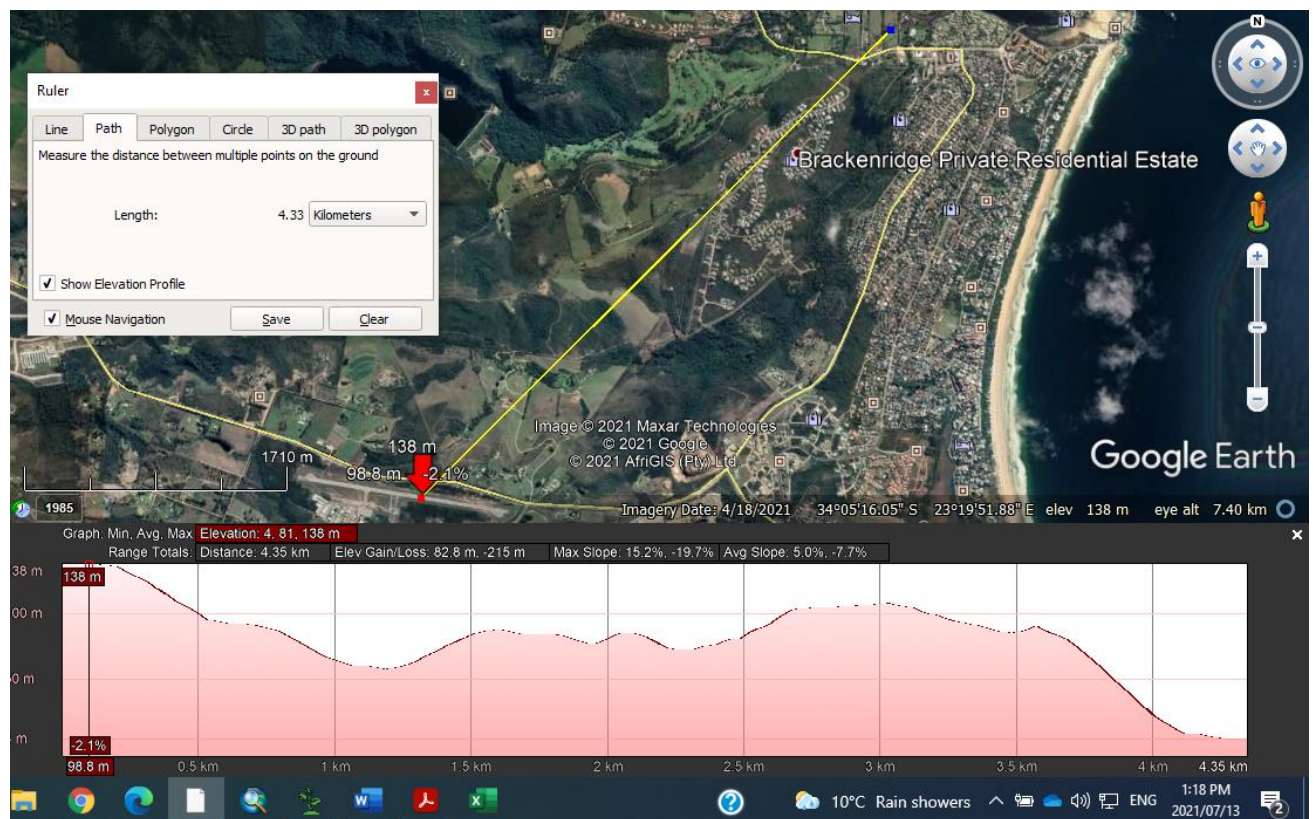
The screening tool identified this them as being “very high”. During the previous EIA process, it was confirmed that Section 38 of the NHRA was not applicable. The development is in keeping with the built environment. The EA approved the footprint of the previous residential dwelling, with a basement with heritage conditions in the event that any artefacts may be unearthed.

The proposed amendment does not require a basement and the facilities will be on stilts. This further reduces the potential for unearthing any artefacts.

No further studies will be undertaken.

Civil Aviation (High Sensitivity)

According to the screening tool, the development is located within 8 km of other civil aviation aerodrome. The airfield in question is the local Robber Airfield which is a small municipal airfield located approximately 4kms to the southwest on a heading of 227.90 degrees. The airfield is approximately 133m higher (138msl) than Erf 2103 (5msl) and is located several valleys away from the property.



The development does not trigger 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 landing 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.

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 an urban edge with an existing EA in place.

Palaeontology (High Sensitivity)

The screening tool identified this them as being "high".

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. The EA approved the footprint of the previous residential dwelling, with a basement with heritage conditions in the event that any artefacts may be unearthed.

The proposed amendment does not require a basement and the facilities will be on stilts. This further reduces the potential for unearthing any artefacts.

No further studies will be undertaken.

Plant Species (Medium Sensitivity)

The screening tool identified this them as being "medium". During the previous EIA process, a plant species and rehabilitation plan was drafted and approved by the DEA&DP. This plan will still be applicable to all areas outside of the amended layout.

No further studies will be undertaken.

Terrestrial Biodiversity (Very High Sensitivity)

The screening tool identified this them as being "very high", notably for being in a Vulnerable Ecosystem, Ecological Support Area and Freshwater Ecosystem Priority Area. 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 Shale Fynbos which is listed as a Vulnerable ecosystem. The confirmed change in ecosystem by SANBI to South Outeniqua Sandstone with a Least Concern status and the Estuarine Functional Zone means this information is incorrect and outdated.

Sensitivity	Feature(s)
Very High	Ecological Support Area 2
Very High	Freshwater ecosystem priority area quinary catchments
Very High	Vulnerable ecosystem

The wetland system is a tidal system and not freshwater. A Wetland Assessment was undertaken previously and has been updated for this application.

Specialist Assessments

Based on the site sensitivities identified, the screening tool identified 10 possible specialist assessments for the development. These are as follows:

1. Landscape/Visual Impact Assessment
2. Archaeological and Cultural Heritage Impact Assessment
3. Palaeontology Impact Assessment
4. Terrestrial Biodiversity Impact Assessment
5. Aquatic Biodiversity Impact Assessment
6. Marine Impact Assessment

7. Hydrology Assessment
8. Socio-Economic Assessment
9. Plant Species Assessment
10. Animal Species Assessment

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

1. Updated Wetland Impact Assessment (which considers the estuarine (marine), aquatic and hydrology of the proposal),

The differences in the approved layout and the proposed amendment show that the overall impact on the site is in fact lessened, and as such the requirement for so many additional studies is not supported.

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

Kind regards,



Ms Melissa Mackay
Snr Consultant