



Cape EAPrac

Cape Environmental Assessment Practitioners (Pty) Ltd

Reg. No. 2008/004627/07
VAT No 4720248386



Telephone: (044) 874 0365
Facsimile: (044) 874 0432

Web: www.cape-eaprac.co.za

17 Progress Street, George
PO Box 2070, George 6530

11 October 2021

Our Ref: BIT634/06

DEA&DP Ref: TBC

RE: SITE SENSITIVITY VERIFICATION REPORT FOR BASIC ASSESSMENT APPLICATION FOR ARCH ROCK RESORT ON PORTION 5 OF 296 KEURBOOMSTRAND, BITOU MUNICIPALITY

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 **6 September 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 Arch Rock is an existing resort and is indicated as being zoned as Resort Zone II according to the Bitou Municipality GIS Portal although correspondence dated 25 May 2018 from the municipality indicates that it is Resort Zone I. The municipality has been informed of the discrepancy, however it is worth noting that the development is a confirmed resort with a Resort Zoning.

The property was originally utilised as a caravan park with a few chalets (first records indicate it was utilised from the 1940s as such), and over the years has been developed to provide 10 chalets that sleep up to 26 pax. The environment has been significantly transformed and landscaped to accommodate the chalets and tourists. According to the Bitou Municipality, the council approved the 2017 Spatial Development Framework (SDF) which clearly places this property inside the urban edge of Keurboomstrand. It is serviced by the municipality in terms of water, sewage and electricity and is surrounded on three sides by residential and tourism properties, thus further establishing its placement inside the urban area.

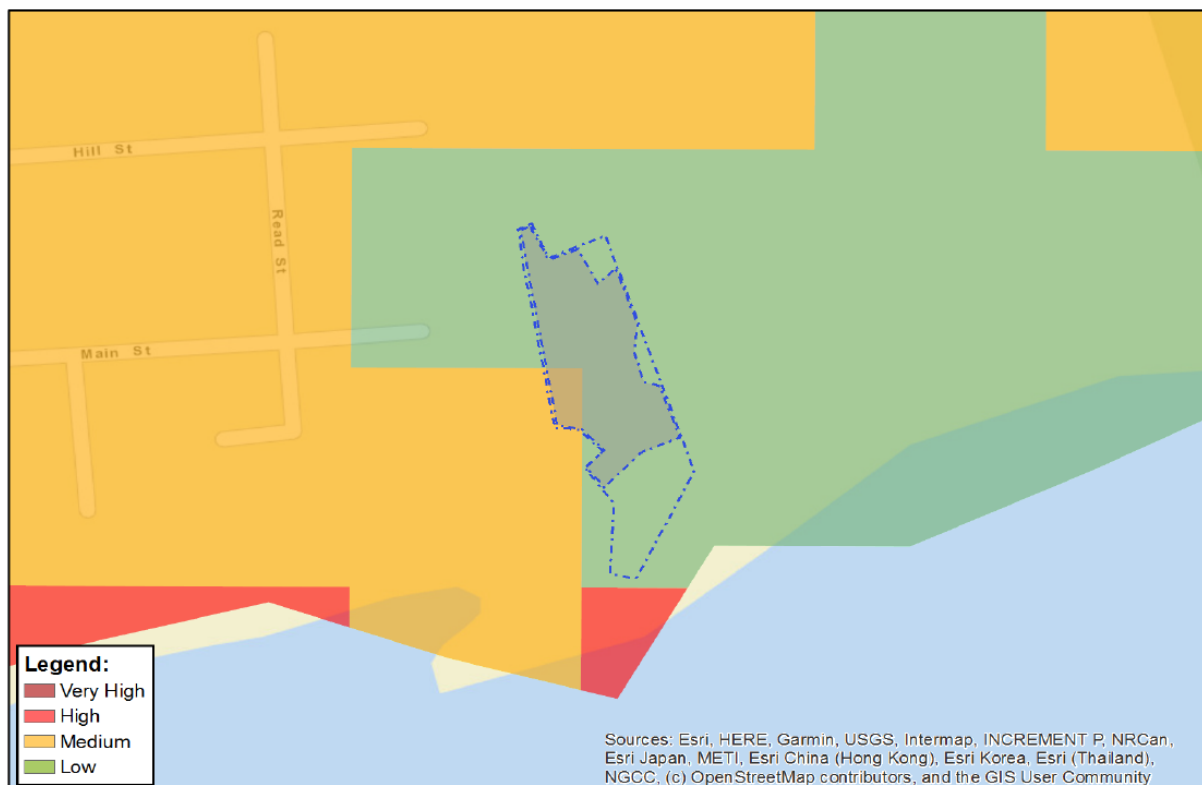
Site visit was conducted by the EAP on 2 March 2020.

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 Application based on the sensitivity themes identified above.

Agriculture (Medium Sensitivity)

The Screening Tool identifies the agricultural sensitivity theme as “medium” due to a portion of the development site falling within the estimated land capability of the site. The property is zoned for Resort use and has not been utilised for agricultural purposes. There is also no intention on the part of the applicant to use the property for agricultural purposes. The properties are located inside the urban area of Keurboomstrand, and the portion in the west identified as medium sensitivity is an already built up environment **not consistent** with agricultural activities.



The land capability layer as used in the Screening Tool does not take into account any urban delineation 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. This property does not qualify in this respect.

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



Photo 1: Main extent of the resort with the chalets showing that no agriculture takes place on the property

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-Sarophorus punctatus
Medium	Invertebrate-Aneuryphymus montanus

It must be noted that the property has been extensively gardened and landscaped for decades and there is very little remaining indigenous vegetation to support the habitats for the species indicated. The proposed development replaces the current resort use for further resort use and as such there is no change to the garden / landscaped environment. It is recommended that only indigenous vegetation is planted in the garden which will encourage faunal use of the habitat.

The photographs below show the level of gardening and lack of diverse habitat as is associated with many residential properties. *Sarophorus punctatus* (dung beetle) and *Aneuryphymus montanus* (Yellow-winged Agile Grasshopper) both require very specific habitat conditions and are not likely to occur on this site.

Sarophorus punctatus is listed as being found twice in December 1976 (<https://eol.org/pages/1027979/maps>) in the slopes above the town of Keurboomstrand with another siting registered in 2021 in the Wilderness Heights area (<https://www.gbif.org/occurrence/3314145505>). Ecology for this species is considered to be forest. There is no other data referencing this species or its habitat preferences. It is however unlikely to occur on a site that has been so transformed and disturbed.

Aneuryphymus montanus is associated with fynbos vegetation, where it has been collected "amongst partly burnt stands of evergreen Sclerophyll in rocky foothills" (Brown 1960). It prefers south-facing cool slopes (Kinvig 2005). There is no fynbos vegetation on this site.

There are few open grassed areas and the site consists of chalets with walkways and paths between trees that have been confined to beds. Many of the species on site are garden species and not indigenous to the listed ecosystem type.



Photo 2: Garden beds that have been developed to be low maintenance with paths for access between chalets



Photo 3: Raised beds for trees allowing paths and roads between



Photo 4: Resort showing chalets with trees between with few grassed areas between
No faunal impact study is therefore being considered for this application.

Aquatic Biodiversity (Low Sensitivity)

The screening tool identified the aquatic biodiversity theme as "low". There are no watercourses nor wetlands on the property. This has been confirmed on site by the EAP.

Photographs above and below (photo taken by Cape EAPrac on 2 March 2020) indicate the lack of wetlands, watercourses or other aquatic features. This is borne out by the NFEPA datasets.

There is thus no need for any aquatic specialist assessments for the redevelopment of this site.



Photo 5: Resort showing chalets with trees between with few grassed areas between. There is no evidence of any aquatic features on the site.



Arch Rock NFEPA

Legend

Scale: 1:1 128
Date created: March 5, 2020

Compiled with CapeFarmMapper



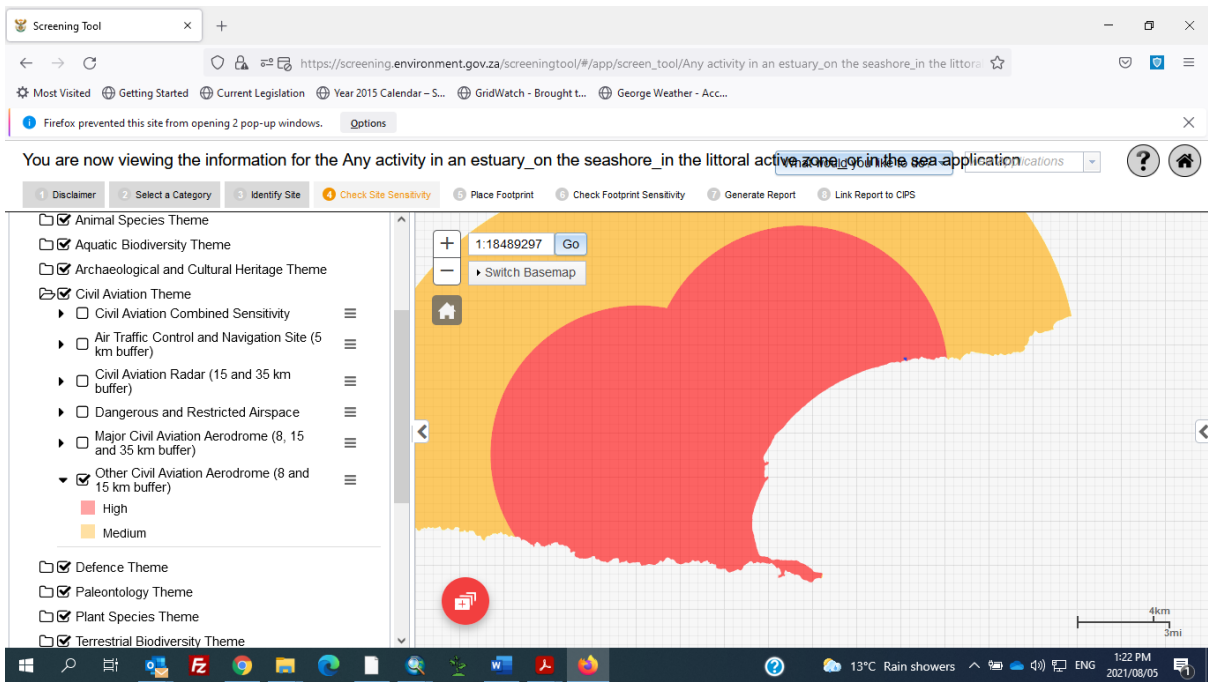
Archaeological & Cultural Heritage (Very High Sensitivity)

The screening tool identified this theme as being “very high” with the reason given as “Within 2km of a Grade II Heritage site”. A Heritage Impact Statement is being drawn up and submitted to Heritage Western Cape (HWC).

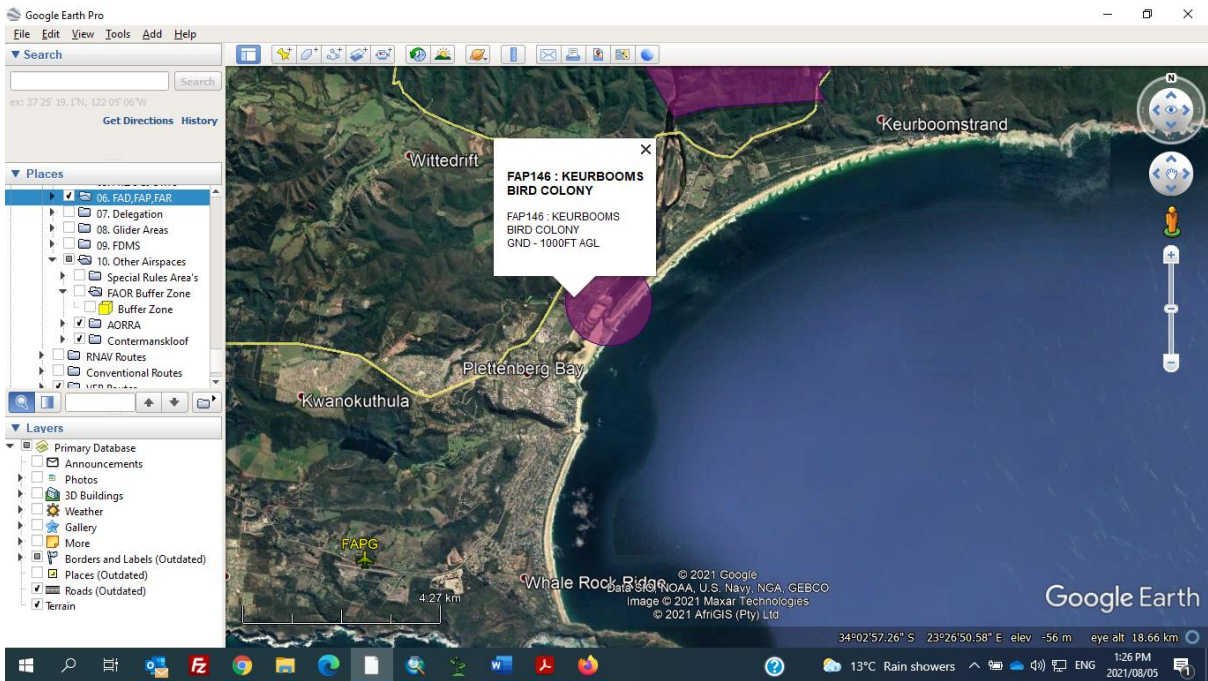
Any further studies will depend on the outcome from HWC.

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 Robberg Airfield which is a small municipal airfield located approximately 15.46kms to the southwest on a heading of 52.17 degrees.



According to the South African Integrated Aeronautical Information Publication (IAIP) dated June 2021, the more likely reason for this sensitivity is the location of the location of FAP146 airspace providing for the Keurbooms bird colony approximately 7.9kms southwest on a bearing of 242.09degrees.



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 theme as being "low". No further studies will be undertaken as the development constitutes an activity inside an urban area, for an existing resort for the purpose of upgrading said resort.

Palaeontology (Medium Sensitivity)

The screening tool identified this theme as being "medium" with no specific reason provided. The site has been developed as a resort since the 1940s and it is highly unlikely that any palaeontological resources would still be present.

A Heritage NID has been drawn up and submitted to Heritage Western Cape (HWC).

Any further studies will depend on the outcome from HWC.

Plant Species (Medium Sensitivity)

The screening tool identified this theme as being "medium". A Botanical and Terrestrial Biodiversity Compliance statement is being drafted for this application. The property has been extensively gardened / landscaped over many decades and there is not expected to be a significant level of biodiversity remaining on site. The trees have been identified on site and the upgraded layout has taken into account the sensitivity rating provided by the EAP. Very few of the trees will be removed and affected by the upgrade. Once the final site layout is approved, applications will be made where any trees require pruning.

Photo 5 above clearly shows the transformation of the site and the landscaping using trees between the chalets.

The mapped vegetation is Goukamma Dune Thicket according to the latest SANBI datasets. Its status is listed as a Least Concern vegetation type. It must be noted that SANBI made the changes to the vegetation types, which do not have to be gazetted, only the status of such vegetation types. Therefore where the vegetation type has changed, it has to be considered in terms of its status and not the previous vegetation type status.



Figure 1: Vegetation Type of the property as per SANBI 2020

Terrestrial Biodiversity (Very High Sensitivity)

The screening tool identified this them as being “very high”, notably for being in a Vulnerable 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 Shale Fynbos which is listed as a Vulnerable ecosystem. The confirmed change in ecosystem by SANBI to Goukamma Dune Thicket (as shown in Figure 1 above) with a Least Concern status means this information is incorrect and outdated.

In addition the site has been significantly transformed over time due to gardening and landscaping associated with the existing resort.

Sensitivity	Feature(s)
Very High	Vulnerable ecosystem

A Botanical and Terrestrial Biodiversity Compliance statement is being drafted for this application. The property has been extensively gardened / landscaped over many decades and there is not expected to be a significant level of biodiversity remaining on site.

Specialist Assessments

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

1. Landscape/Visual Impact Assessment
 This assessment will be not be undertaken as an assessment but the development will be considered in light of the current built environment in the Heritage NID.
2. Archaeological and Cultural Heritage Impact Assessment

Given the significant transformation and development that has already taken place on this site, it is unlikely that any such assessment will be required. A Heritage NID was submitted to Heritage Western Cape for confirmation.

3. Palaeontology Impact Assessment

Given the significant transformation and development that has already taken place on this site, it is unlikely that any such assessment will be required. A Heritage NID was submitted to Heritage Western Cape for confirmation.

4. Terrestrial Biodiversity Impact Assessment

5. Aquatic Biodiversity Impact Assessment

Not deemed necessary as explained in this report.

6. Marine Impact Assessment

The development does not take place in the sea and therefore does not impact on the marine environment. A Coastal Engineering study provides specialist input into the onshore environment.

7. Avian Impact Assessment

No avian species were identified as sensitive species in the Animal Species theme. The redevelopment of the site retains the majority of the existing trees as habitat and no further avian assessment will be undertaken.

8. Geotechnical Assessment

A Geotechnical investigation will be undertaken.

9. Socio-Economic Assessment

No such assessment will be undertaken as the resort is an existing facility inside the urban edge. Correspondence with the municipality's Local Economic Development (LED) directorate will be included with the Basic Assessment Report confirming the viability and suitability of the development.

10. Plant Species Assessment

As stated earlier in this report.

11. Animal Species Assessment

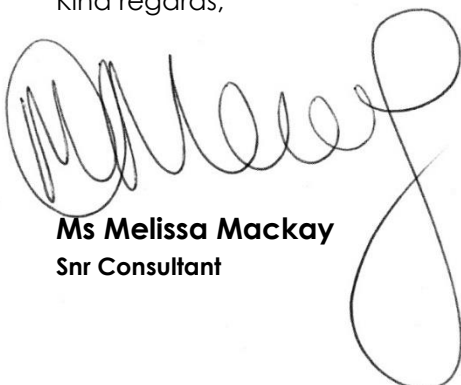
As stated earlier in this report.

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

1. Heritage Impact Statement (which considers impacts on built environment and heritage resources)
2. Botanical and Terrestrial Compliance Statement
3. Coastal Engineering Assessment (which considers the impact on the beach (marine)),
4. Geotechnical Study

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

Kind regards,



Ms Melissa Mackay
Snr Consultant