



# SITE SENSITIVITY VERIFICATION REPORT

for

## KELLERSHOOGTE 24G

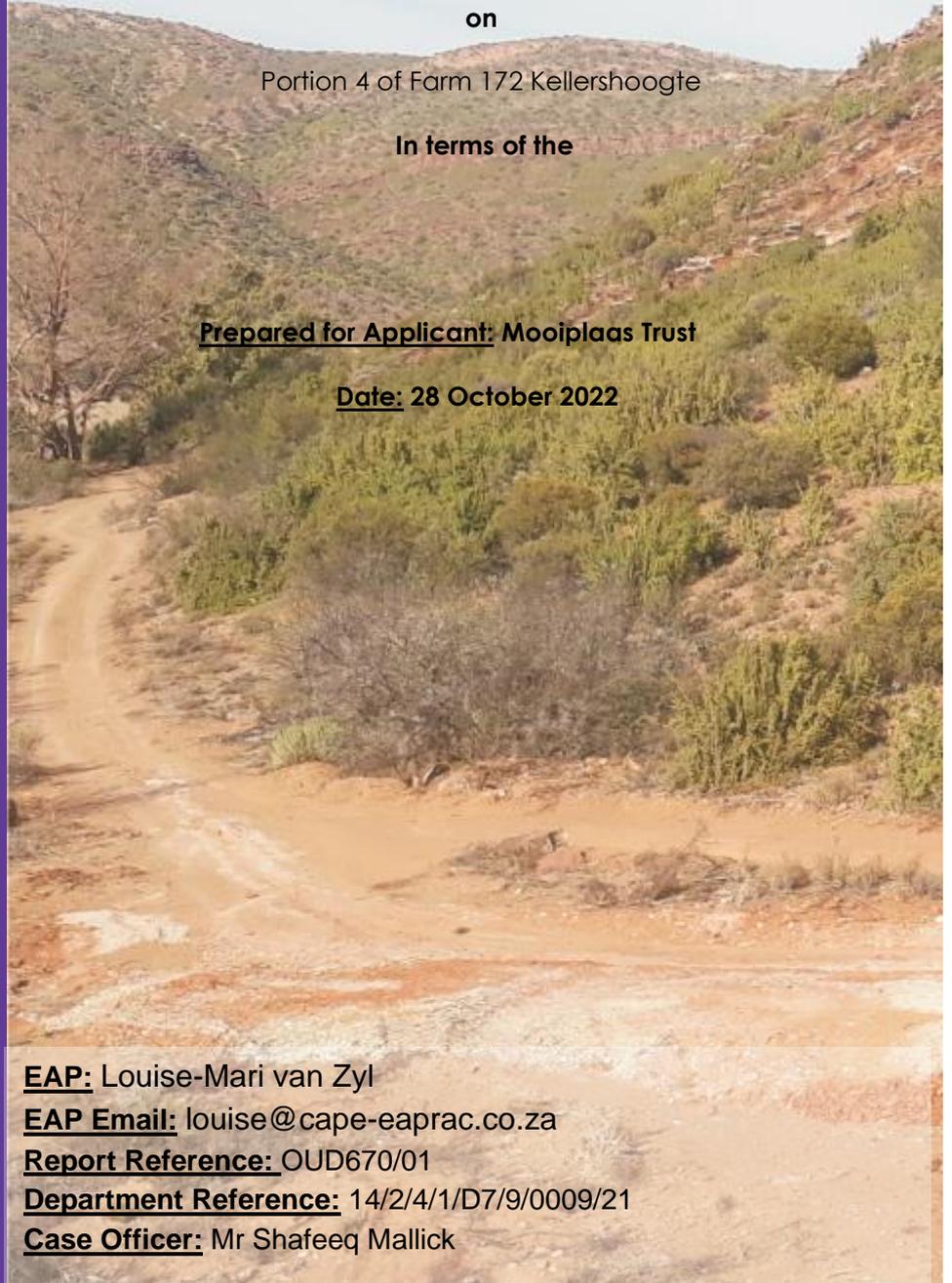
on

Portion 4 of Farm 172 Kellershoogte

In terms of the

Prepared for Applicant: Mooiplaas Trust

Date: 28 October 2022



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**Report Reference:** OUD670/01

**Department Reference:** 14/2/4/1/D7/9/0009/21

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# Cape EAPrac

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## 1. INTRODUCTION

**Cape Environmental Assessment Practitioners (Pty) Ltd** (Cape EAPrac), has been appointed by **Mooiplaas Trust** ("the applicant") as the Environmental Assessment Practitioner ("EAP") to facilitate the 24G Rectification Process in terms of the National Environmental Management Act (Act 107 of 1998), as amended, ("NEMA"), and the 2014 Environmental Impact Assessment ("EIA") Regulations (as amended) for activities deemed to have required *prior* environmental authorisation. The applicant commenced with:

- the clearance of 13 hectares (ha) of vegetation on land that has been uncultivated for more than 10 year to develop orchards. A total of 70 ha was initially planned for this developed, however site constraints have reduced this to 56ha;
- installing of a 200 millimeter (mm) pipeline inside a 250 mm sleeve and a 220V power cable inside a 63 mm sleeve laid from Portion 19 of Farm 170 to Portion 4 of Farm 172 across Remainder Farm 172, Portion 11 of Farm 170 and Portion 3 of Farm 172. This is to provide drip irrigation to the orchard. The sleeves were placed in an earth trench along an existing farm track traversing an unnamed, non-perennial watercourse.

### LOCATION

The site, Portion 4 of Farm 172 Kellershoogte is located directly south of the R328, roughly 13.5km south west of the town of Oudtshoorn. Please see Figure 1: Locality Map.



Figure 1: Locality Map indicating the cleared 13ha with red boundary, the dark green as the preferred +/-56ha against the total cadastral property Portion 4 Farm 172 in the transparent green.

Initially the Applicant considered nearly 70 ha the greater Portion 4 of Farm 172 Kellershoogte for development of orchards. The outcome of the environmental investigation process resulted in this area being reduced to 56ha in order to accommodate site sensitivities.

The Site Sensitivity Verification Report forms part of the environmental assessment process being undertaken. The 24G process seeks to rectify the commencement of the listed activity without authorisation by making application for an Environmental Authorisation from the Department of Environmental Affairs and Development Planning 24G Directorate.

The Department of Forestry, Fisheries and Environmental ("DFFE") promulgated regulations for the compulsory submission of a report based on the National Web-based Environmental Screening Tool when undertaking and submitting an application for Environmental Authorisation (GN960 of 2019). On 20 March 2020, 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 (107 of 1998) were published. These procedures prescribe the requirements for undertaking Site Sensitivity Verification Report as well as describe the requirements for specialist input per environmental 'theme' in the National Web-based Environmental Screening Tool.

According to the above-mentioned notice, the Site Sensitivity Verification Report must be recorded in the form of a report that:

- Confirms or disputes the current use of the land and the environmental sensitivity as identified by the screening tool, such as new development or infrastructure, the change in vegetation cover or status etc.
- Contain motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity.
- Is submitted together with the relevant assessment report prepared in accordance with the requirements of the EIA Regulations.

This report will provide a verification for which themes will be further investigated, and motivation for the themes that will not be further investigated for the proposed development.

## 2. METHODOLOGY

To inform this SSVR, the EAP has undertaken the following:

### Desktop analysis:

The Protocols require that a desktop analysis be undertaken. The following resources were utilized:

- Satellite imagery using Google Earth Pro (version 7.3.4.8248) which included imagery from 2016 – 2020 to present; and
- CapeFarmMapper (version 2.6.10)

### Site inspection

Various site inspections were undertaken with the first on 14 April 2021, followed by another site visit on 14 June 2022. This included walking the accessible parts of the site, and photographic documentation.

## 3. HISTORICAL IMAGERY

The following figures show the historical imagery of the site between December 2011 and March 2022. The applicant commenced with listed activities clearing an initial 13 ha cultivation area, boreholes, and the pipeline in during the course of 2020.

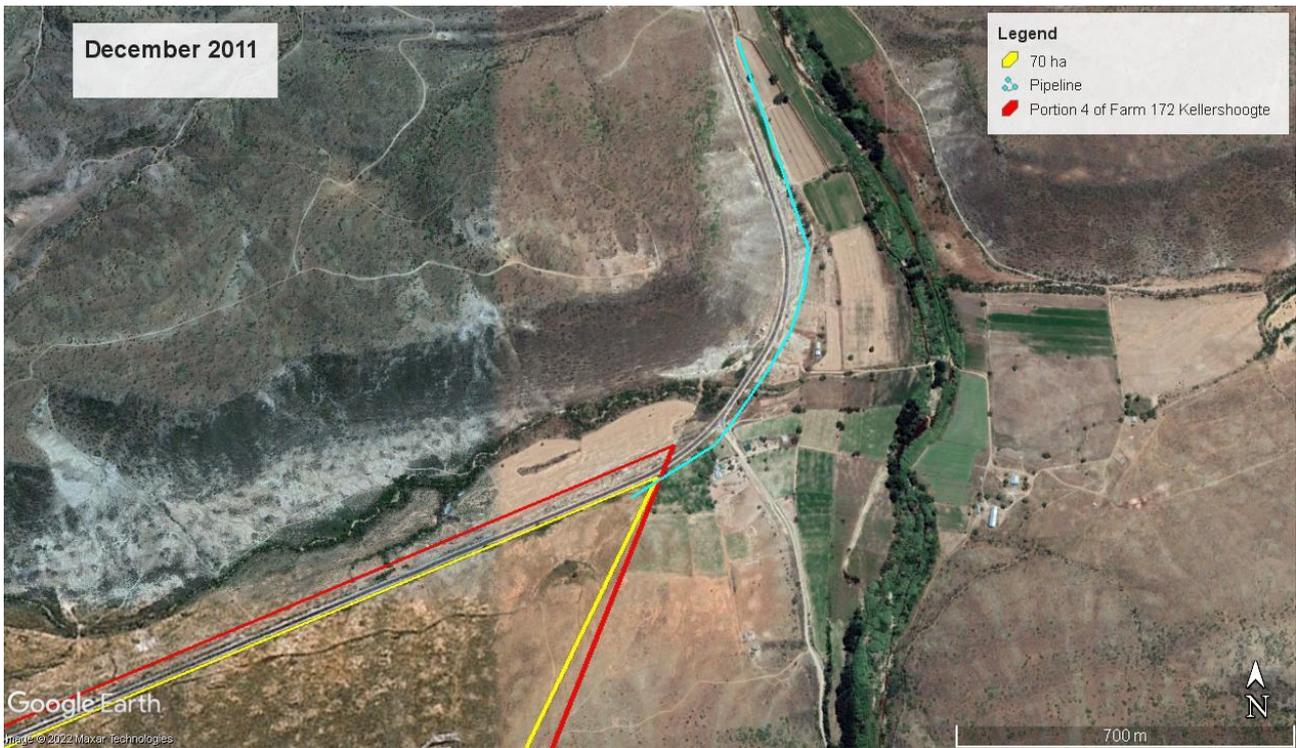


Figure 2: Historical Imagery December 2011

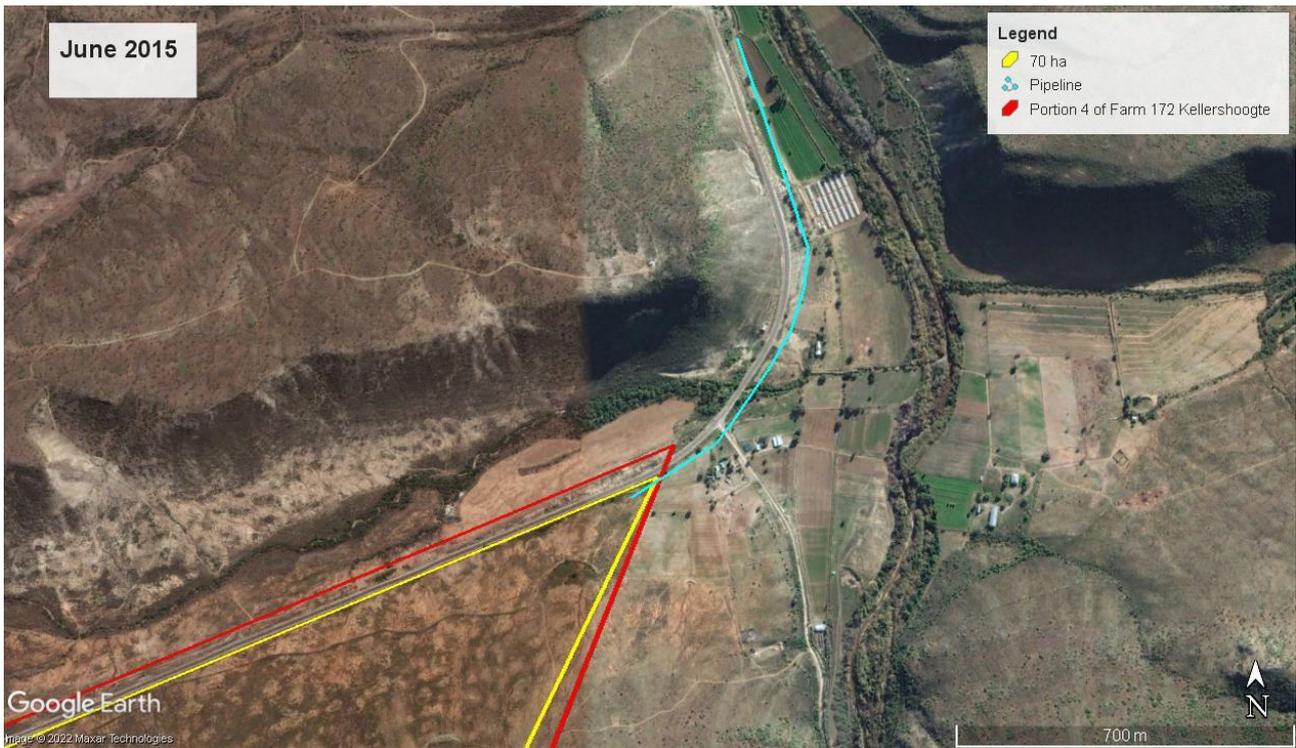


Figure 3: Historical Imagery June 2015

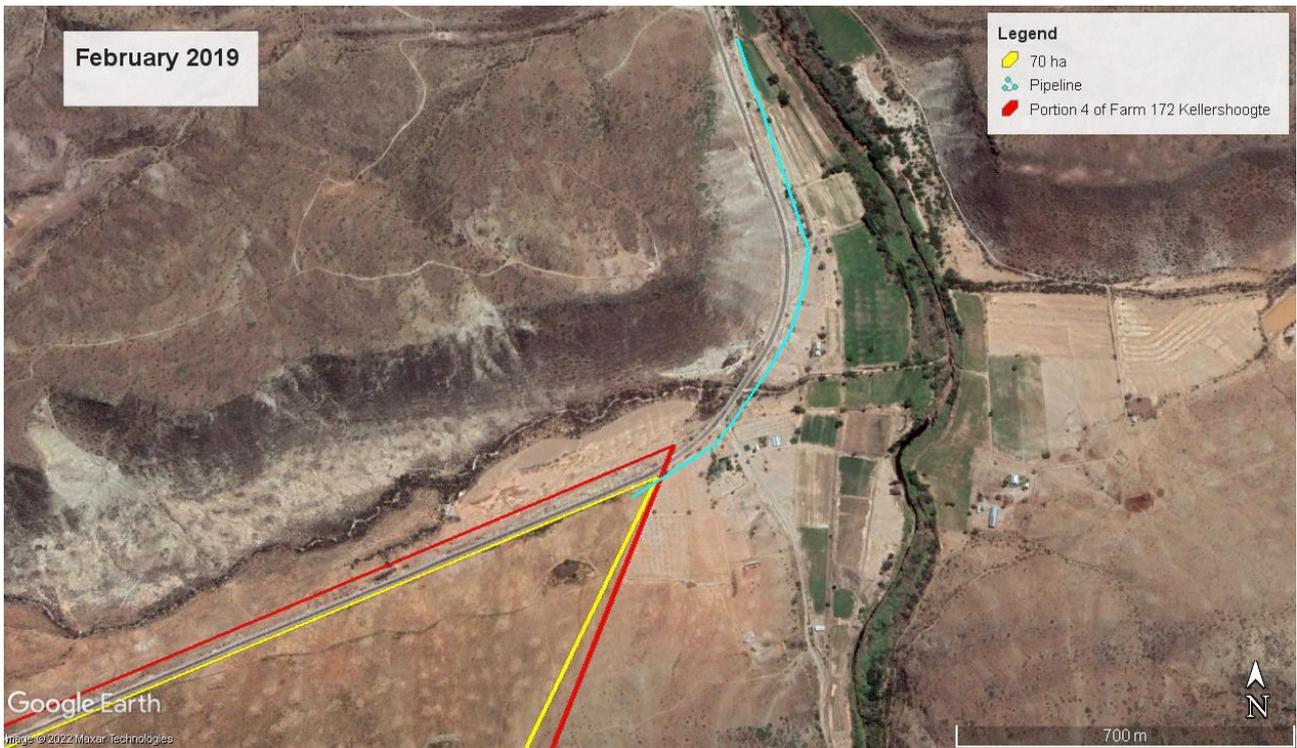


Figure 4: Historical Imagery February 2019

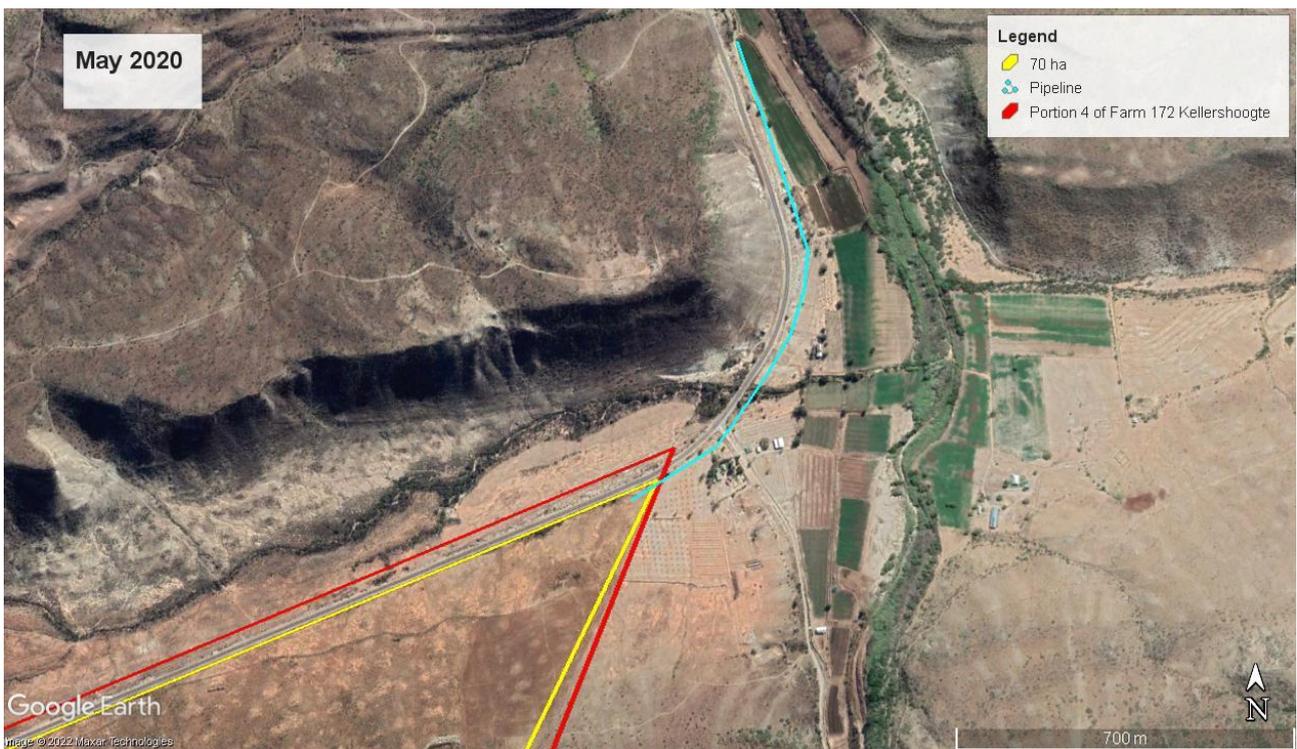


Figure 5: Historical Imagery May 2020

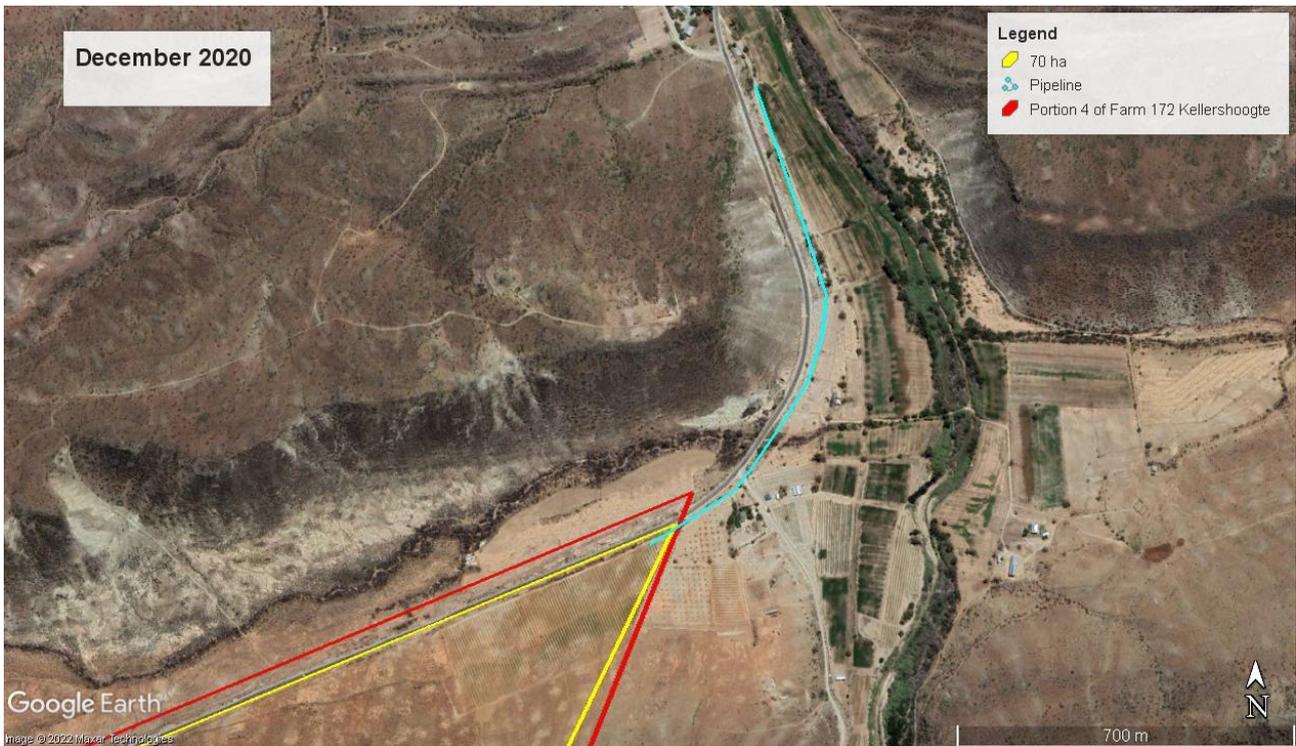


Figure 6: Historical Imagery December 2020

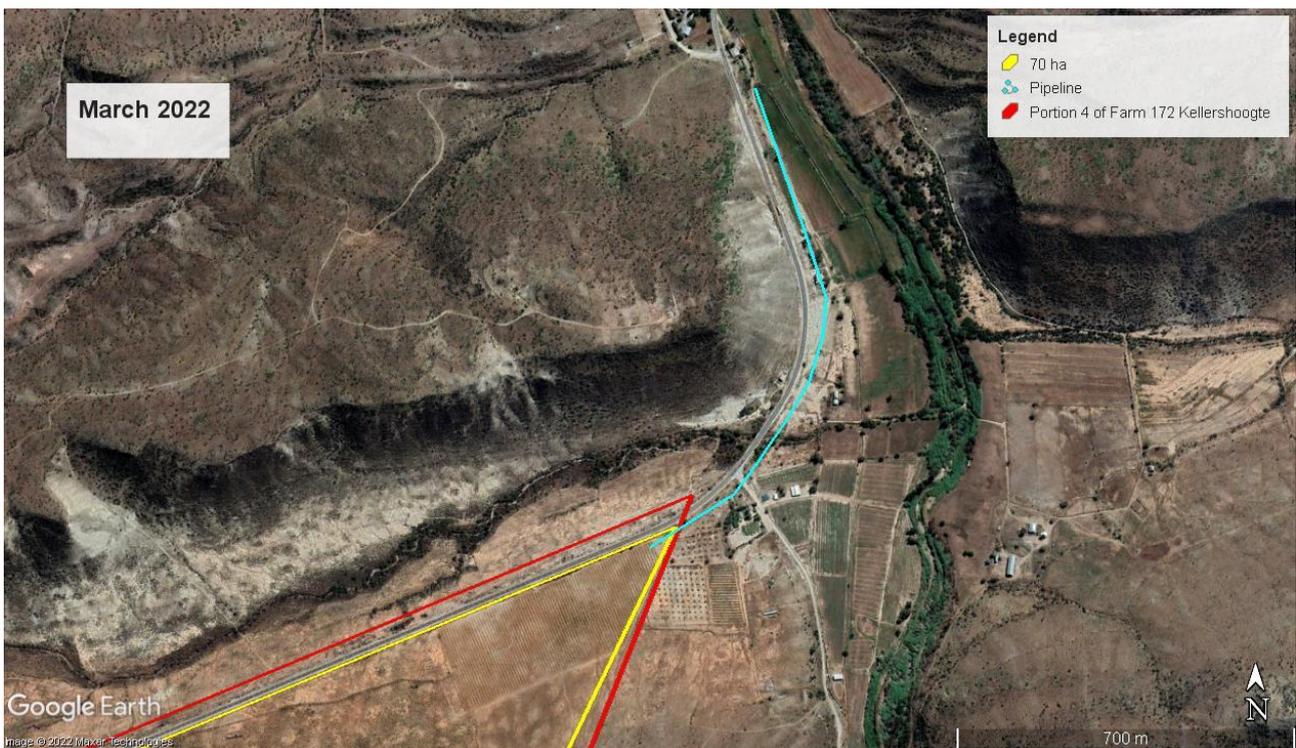


Figure 7: Historical Imagery March 2022

#### 4. SITE PHOTOGRAPHS

Figure 9 to 18 shows the site just after commencement and then also from a site inspection on 08 June 2022.



Figure 8: The cultivated area just after commencement of activities – 2022



Figure 9: View of the +/- 7ha cultivated area (red polygon) that commenced without authorisation – 08 June 2022. Another +/- 6ha to the left top-left of the image area areas that were ripped in preparation of planting, but the Applicant halted planting in response to the notifications received from DEADP: Law Enforcement.



Figure 10: View of the drainage line (blue line) ending in the cultivated area focussing on the 6ha ripped but not yet planted.



Figure 11: View of a drainage line (wash area) [blue line] into 6ha area already ripped but not yet planted by end 2020.



Figure 12: View of the most western drainage line within the proposed cultivation area creating the western boundary of the proposed cultivation area. Indigenous vegetation in the background but not of high sensitivity – 08 June 2022



Figure 13: View of the area of the existing farm access road, and where the pipeline has been installed.



Figure 14: Drip irrigation on the site – 08 June 2022



Figure 15: Image of the vegetation on site in 2020 outside of the proposed cultivation area.



Figure 16: Image of the vegetation on site in 2022 outside of the proposed cultivation area.

## 5. LAND USES

The area cleared on Portion 4 of Farm 172 Kellershoogte was previously used for agricultural activities but has been lying fallow for more than 10 years.

The surrounding lands are farmlands used for various agricultural activities such as crop cultivation, ostrich farming and natural grazing.

## 6. ENVIRONMENTAL THEMES AND SENSITIVITIES

The following sections address the sensitivity of each theme separately, confirming or disputing the site sensitivity and indicating whether an assessment, a compliance statement or no further assessment will be undertaken for the project.

The following themes and their sensitivity ratings are identified in the Screening Tool Report:

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme				
Animal Species Theme				
Aquatic Biodiversity Theme				
Archaeological & Cultural Heritage Theme				
Civil Aviation Theme				
Defence Theme				
Palaeontology Theme				
Plant Species Theme				
Terrestrial Biodiversity Theme				

The following specialist assessments have been identified in the Screening Tool Report for inclusion in the environmental assessment report:

- Agriculture
- Landscape / visual
- Archaeological
- Paleontology
- Terrestrial biodiversity
- Aquatic biodiversity
- Hydrology
- Socio-economic
- Plant species
- Animal species

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 Screening Tool Report notes that the site does not intersect with any Environmental Management Framework or development zones.

### Agriculture

According to the Web-Based Environmental Screening Tool the agricultural sensitivity of the site is High Sensitivity as a result of a very small portion of the site in the northeast having a Land Capability considered between Moderate to High. A portion of the site also considered Medium Sensitivity with a Land Capability between Low-Moderate to Moderate. However, the site is largely of low sensitivity with the Land Capability between Low-Very Low to Low.

According to CapeFarmMapper the land capability is considered Low-Very Low. However, there are portions within the proposed development area that are considered to be of Moderate-High.

It is understood that the site is within an agricultural area. For this reason, a Soil Scientist has been appointed to conduct a **Compliance Statement**.

#### Animal Species

The Animal Species theme is considered to be of Medium Sensitivity due to the possible presence of *Aneuryphymus montanus* (Yellow-winged Agile Grasshopper), and *Bunolagus monticularis* (Riverine Rabbit). An animal species specialist **Compliance Statement** has been undertaken.

#### Aquatic Biodiversity

The Web-Based Environmental Screening Tool indicates a low aquatic sensitivity within the proposed orchard area, and Very High sensitivity.

According to CapeFarmMapper, the following is noted:

- Several non-perennial watercourses cross Portion 4 of Farm 172. However, three non-perennial watercourses are located within the proposed planting area.
- The non-perennial watercourses are categorised as Aquatic Ecological Support Areas 1 (ESAs), and very small portions bisecting these watercourses as Aquatic ESA 2 areas.
- These non-perennial watercourses flow south and into a larger non-perennial watercourse (situated on Remainder of Farm 172) which flows in an easterly direction into the Kandelaarsrivier.
- The Kandelaarsrivier is approximately 506 m east of the proposed planting area.

The applicant commenced with the establishment of boreholes on, placing a 200 millimeter (mm) pipeline in an earth trench crossing a non-perennial watercourse, and the loss of a drainage line that ended in the 13 ha cultivated area.

An Aquatic Specialist has been appointed to conduct an **Impact Assessment**.

#### Archaeological And Cultural Heritage and Paleontology

According to the Web-Based Environmental Screening Tool, the Archaeological and Cultural Heritage is considered of Low sensitivity, and the Paleontology sensitivity is considered Very High Sensitivity.

In terms of the National Heritage Resources Act (Act 25 of 1999), Section 38 (1) (a), and (c) (iii) is applicable, and relates to the construction of a pipeline exceeding 300m in length, and where the character of the site is changed exceeding 5000m<sup>2</sup>.

A Heritage Specialist has been appointed to compile a Notice of Intent to Develop for submission to Heritage Western Cape confirming that the site is not deemed sensitive and that no further studies are required.

On 2 November 2022 the HWC confirmed that the site sensitivity is low and as such no further studies are required.

#### Civil Aviation

The Web-Based Environmental Screening Tool identifies the development site as being of Medium sensitivity as it is within the 8 to 15 km radius of other civil aviation aerodrome.

The proposed orchards and pipeline will not impact on any aviation activities since what is proposed is not exceptional or new that will affect such activities. The Medium sensitivity is thus disputed and rather believed to be of Low significance and negligible impact. Therefore, no further study is required to this theme.

Defence

The Defence theme sensitivity is noted as Low in the National Web-based Environmental Screening Tool Report. The Screening Tool Report does not indicate or reference any metadata used to classify the proposed development under the Defence Theme. According to the protocols, no further assessment or compliance statement is required for the Defence Theme.

Plant Species

The Screening Tool Report notes that the Plant Species is of Medium Sensitivity as a result of the identified plant species in table 1 below.

Table 1: Plant species identified in the Screening Tool Report (page 16)

Sensitivity	Feature(s)
Medium	<i>Glottiphyllum linguiforme</i>
Medium	<i>Aspalathus pedunculata</i>
Medium	<i>Lotononis acocksii</i>
Medium	<i>Selago ferruginea</i>
Medium	<i>Tritonia pallida</i> subsp. <i>taylorae</i>
Medium	Sensitive species 537
Medium	Sensitive species 155
Medium	Sensitive species 111
Medium	Sensitive species 842
Medium	Sensitive species 54
Medium	Sensitive species 187
Medium	<i>Adromischus mammillaris</i>

A Botanical specialist has conducted an **Impact Assessment**.

Terrestrial Biodiversity

According to the Screening Tool Report, the terrestrial biodiversity sensitivity is Very High because of the sensitivities identified in table 2 below.

Table 2: Terrestrial Biodiversity sensitivities identified in the Screening Tool Report (page 17)

Sensitivity	Feature(s)
Very High	Ecological Support Area 2
Very High	Ecological Support Area 1
Very High	Critical Biodiversity Area 1
Very High	Vulnerable ecosystem

To inform the 24G assessment process, a terrestrial biodiversity Impact Assessment has been conducted.

## **OTHER SPECIALIST STUDIES IDENTIFIED:**

### (i.) Landscape/visual assessment

The activity undertaken involves the cultivation of land for crop production in an area utilized as well as designated for agriculture.

Within the region, agricultural activities such as grazing and crop production are already undertaken and associated with the landscape character of the area. The proposed continuation of agricultural activities is not expected to have any unfamiliar visual impact, or require a landscape plan. Therefore, no landscape or visual assessment will be undertaken.

### (ii.) Hydrology assessment

A Geohydrology Report has been compiled to inform the water use application regarding the borehole quality.

### (i.) Socio-Econ assessment

Optimizing agricultural land within primary rights on land appropriately zoned for agricultural purposes is not deemed to be an activity that automatically may result in negative socio-economic impacts. The area is a relatively dry region and diversifying agricultural activities within such a region contributes to extending employment opportunities throughout the year.

It is submitted that there are no known substantial negative socio-economic impacts associated with the proposed cultivation. For this reason no socio-economic assessment/study has been undertaken. Should the public participation process identify issues that may require further assessment it will be considered.

## **7. CONCLUSION**

The National Web-Based Environmental Screening Tool identifies the environmental themes that the proposed development may impact on. The report includes sensitivity ratings for each of these themes. The screening report also provides a list of identified specialist assessments to be included within the assessment process.

For this proposal, the screening tool identified themes ranging in sensitivity from Low to Very High. This Site Sensitivity Verification Report provides reasons for disputing the screening tool sensitivity ratings and reasons as to why the screening tool identified specialist assessments are not included in this environmental assessment process.

Table 3 provides a summary of the environmental themes and identified specialist assessments and whether the relevant studies will be undertaken for this environmental assessment process and the reasons why the specialist assessments will not be included in the assessment process.

Table 3: summary of the environmental themes and identified specialist assessments and whether the relevant studies will be undertaken

<b>Environmental theme and/or specialist assessments identified</b>	<b>Sensitivity rating</b>	<b>Impact Assessment / Compliance Statement / None</b>
Agriculture	High	Compliance
Animal Species	Medium	Compliance
Aquatic Biodiversity	Low	Assessment

Archaeological and Cultural Heritage	Low	NID accepted by HWC confirming low sensitivity with no need for further studies.
Palaeontology	Very High	
Civil Aviation	Medium	None – see section 6
Defence	Low	None – see section 6
Plant Species	Medium	Compliance Statement
Terrestrial Biodiversity	Very High	Assessment
Landscape / Visual Assessment	No rating – additional specialist assessment identified to above sensitivities	None – see section 6
Socio-Economic Assessment		None – see section 6
Hydrology Assessment		None – see section 6