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SITE SENSITIVITY VERIFICATION REPORT (SSVR)

For

BAR: KRAAIBOSCH PARK



Submitted by	HillLand Environmental
HillLand reference	GEO24/981/72
Date	9 May 2024

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Site Sensitivity Verification Report (SSVR) for EA application: Kraaibosch Park**Submitted to:**

DEADP review and comment – submission with NOI

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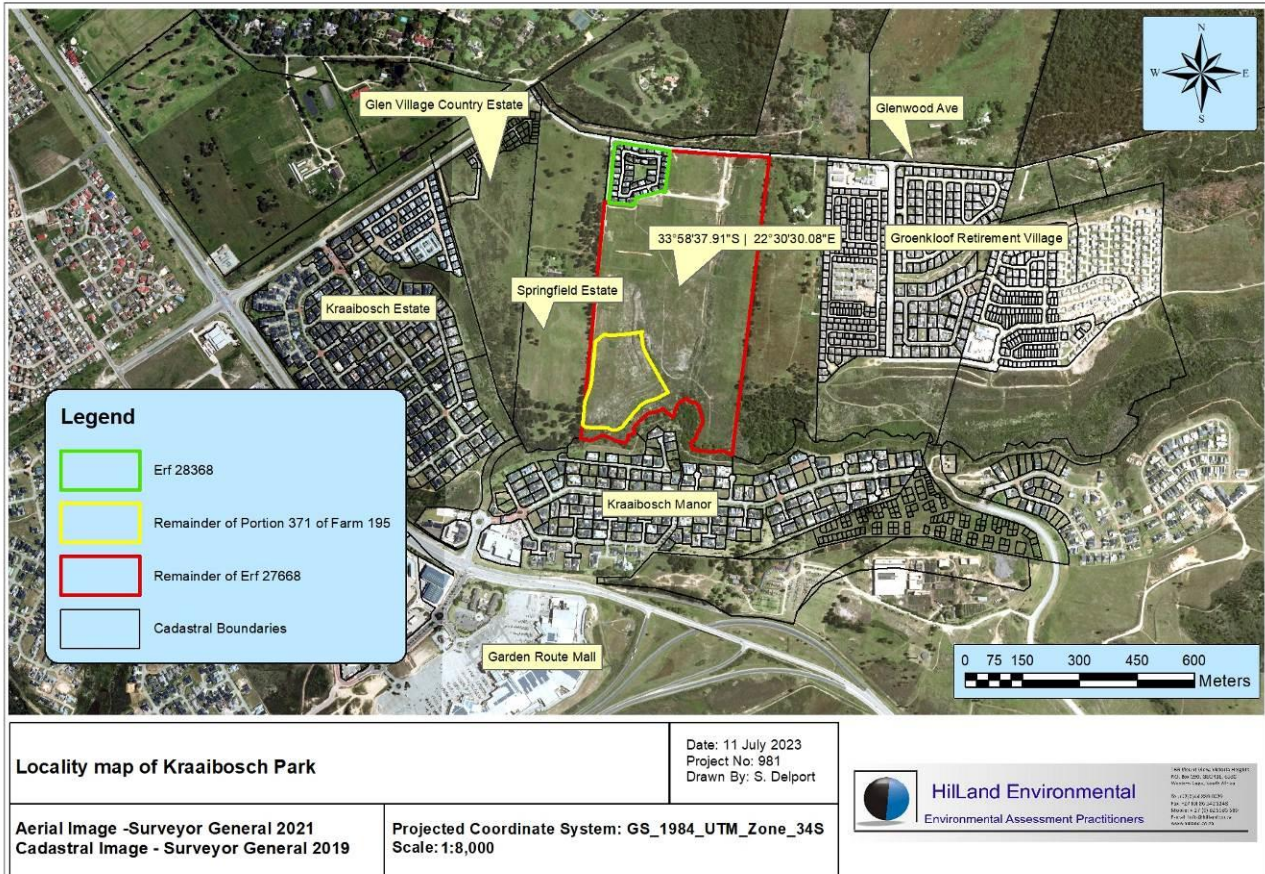
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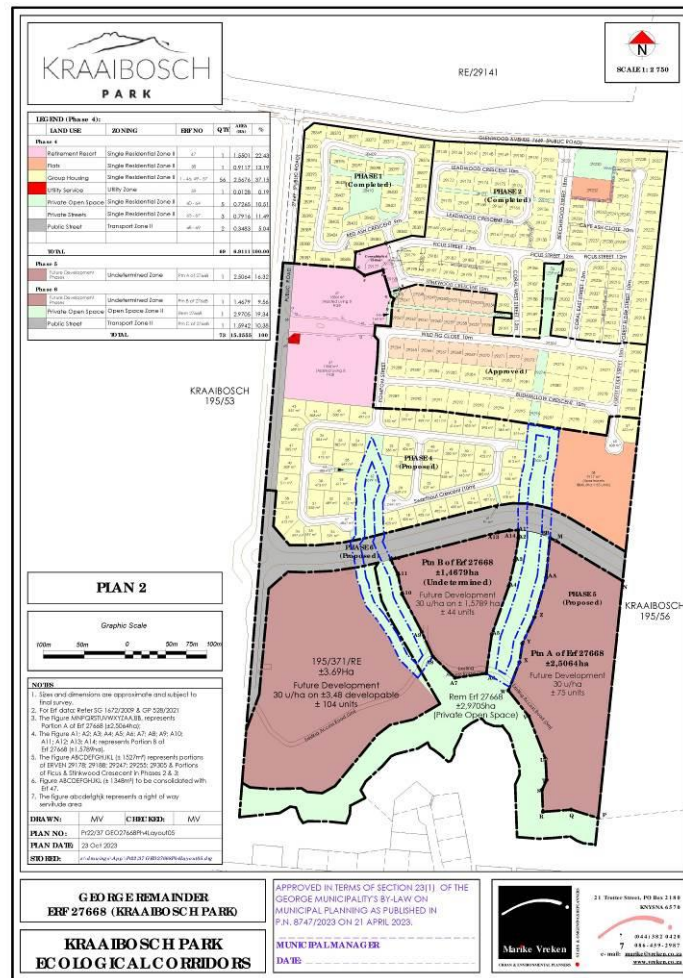
1 INTRODUCTION

HillLand Environmental, independent Environmental Assessment Practitioners (EAPs), have been appointed by the Applicant, **Cape Estates Properties Outeniqua (Pty) Ltd represented by Mr Arno de Vos**, to ensure compliance with the National Environmental Management Act (NEMA, No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended).



A Basic Assessment application was deemed as necessary by DEADP for the amendment of the currently approved SDP for the development. Phase 1 and 2 are already developed and phase 3 is under construction. Phase 4 will commence on approval and the future phases will follow.

A small section of phase 2 will be amended and added to phase 4.



Proposed new layout plan for Kraaibosch Park

2 PURPOSE OF THIS REPORT

This site sensitivity verification report forms part of the NEMA process as required and responds to the screening tool report generated from the National Web Based Environmental Screening Tool.

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 are applicable to all applications 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.

3 SENSITIVITY VERIFICATION AND METHODOLOGY

According to the protocols Site Sensitivity Verification must be undertaken by the EAP or in some circumstances by a specialist and must include the following:

- Desktop analysis
- Site inspection
- Other relevant information which can inform the sensitivity rating assigned by the screening tool.

This site sensitivity verification statement was compiled by the EAP, HillLand Environmental, based on the following:

- Site visits (numerous since 2018 as HillLand Environmental is the appointed ECO);
- Historic application information for the development;
- A desktop investigation aerial photography and the various mapping tools (biodiversity and land use mapping, Western Cape Biodiversity Spatial Biodiversity, CBA & ESA mapping, NBA mapping and Cape Farm Mapper).

4 RESULTS OF SCREENING TOOL

Application category:

- Transformation of land | Indigenous vegetation
- Transformation of land | From agriculture or afforestation
- Utilities Infrastructure | Pipelines | Water | Fresh_Storm Water
- Infrastructure | Transport Services | Roads | Private /Public

4.1 SENSITIVITY THEMES



The table below serves to:

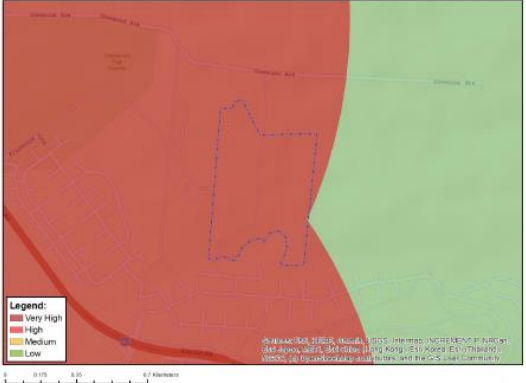
- Indicate the theme sensitivities identified in the screening tool report (March 2023 June 2023, January 2024 and again in May 2024 to verify the results).



It is necessary to confirm / dispute the sensitivity rating and need for the various specialist inputs called for in terms of the screening tool report.

Based on the screening tool reports and the environmental sensitivity of the site, the following themes are identified:

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity	Reason for sensitivity rating														
Agriculture theme		X			<p>MAP OF RELATIVE AGRICULTURE THEME SENSITIVITY</p> <table border="1"> <tr> <td>Very High sensitivity</td> <td>High sensitivity</td> <td>Medium sensitivity</td> <td>Low sensitivity</td> </tr> <tr> <td></td> <td>X</td> <td></td> <td></td> </tr> </table> <p>Sensitivity Features:</p> <table border="1"> <thead> <tr> <th>Sensitivity</th> <th>Feature(s)</th> </tr> </thead> <tbody> <tr> <td>High</td> <td>Land capability:09, Moderate-High/10, Moderate-High</td> </tr> <tr> <td>Medium</td> <td>Land capability:06, Low-Moderate/07, Low-Moderate/08, Moderate</td> </tr> </tbody> </table>	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity		X			Sensitivity	Feature(s)	High	Land capability:09, Moderate-High/10, Moderate-High	Medium	Land capability:06, Low-Moderate/07, Low-Moderate/08, Moderate
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4.2 IMPACT ASSESSMENTS IDENTIFIED IN THE SCREENING TOOL REPORT

The screening tool identified the following impact assessments based on the selected classification and environmental sensitivities:

- Landscape/visual impact assessment (general protocol);
- Archaeological and cultural heritage impact assessment (general protocol);
- Palaeontology impact assessment (general protocol);
- Terrestrial biodiversity impact assessment (terrestrial biodiversity assessment protocol);
- Aquatic impact assessment (aquatic biodiversity assessment protocol);
- Hydrology assessment (general protocol);
- Socio-economic impact assessment (general protocol);
- Plant species assessment (plant species assessment protocol);
- Animal species assessment (animal species assessment protocol).

5 RESULTS OF SITE VERIFICATION

5.1 DESKTOP ASSESSMENT

5.1.1 LOCATION

Kraaibosch park is a residential development in George, Kraaibosch area. The property is in the urban edge and area of George and is surrounded by other residential developments.



Drone footage over Phase 1 and 2 of Kraaibosch Park (Cape Estates, 2023)

A BAR is required for the amendment based on the work in the riparian areas for the storm water controls. All development remains within the areas already approved for residential development. The development zone will remain as approved and buffer area along the Modderug River will remain as specified in the original ROD and the open space along the wetlands increases.

5.1.2 AERIAL PHOTOGRAPHIC ANALYSIS

Biophysical factors as included in the ROD:

2) Biophysical Factors

The property has been utilized for agricultural and forestry purposes over time. The natural vegetation unit¹ that occurred at the property, viz. Garden Route Shale Fynbos has been transformed for the most part. Remnants of this vegetation unit are thus of utmost conservation importance as Garden Route Shale Fynbos is Endangered, and if any indigenous plant species are found to occur at the property they must be rescued prior to land clearing to be incorporated into the development's rehabilitation and landscaping programme (refer to § G 7.10).

The riverine habitat of the Modderkloof / Modderugrivier occurring along the southern boundary of the property has been proposed as Open Space and is regarded as a Core Natural area or green belt / corridor, linking other properties flanking the Modderkloof / Modderugrivier. Linking green belt areas as ecological corridors would provide space for fauna, flora and water bodies as well as allow movement of animals, plant propagules and water to drain. A setback line of 30 metres (see § G 5.3 above) from each side of the Modderkloof / Modderugrivier and dams or wetlands, will provide a conservation buffer zone to protect the habitat and facilitate hydrological and ecological functioning of the riverine habitat. Buffers will protect the ecological integrity of the ecosystem and provide sufficient space to allow for restoration work and management of these wetland systems.

As indicated in the KG-LSP condition 9 must be adhered to as a requirement for the development to be registered at the Registrar of Deeds office. Once the Open Space(s) alongside the Modderkloof / Modderugrivier is sufficiently restored or rehabilitated the management will revert to the responsibility of George Municipality. The overarching objective of the Open Space System is that it will be managed holistically as part of the George Open Space System ("GOSS"), retaining linkages or green belt / corridors throughout the Urban Area. There will be a walkway or boardwalk to allow unhindered access for pedestrians, runners and cyclists to utilize the Open Space. With the GOSS the aim is to provide cycle routes and walkways linking the Greater Kraaibosch Area ("GKA") to existing suburbs and

proposed adjacent developments at the Garden Route Mall and Garden Route Dam.

Transformation of the property for agricultural purposes is evident on the 1936 aerial image:

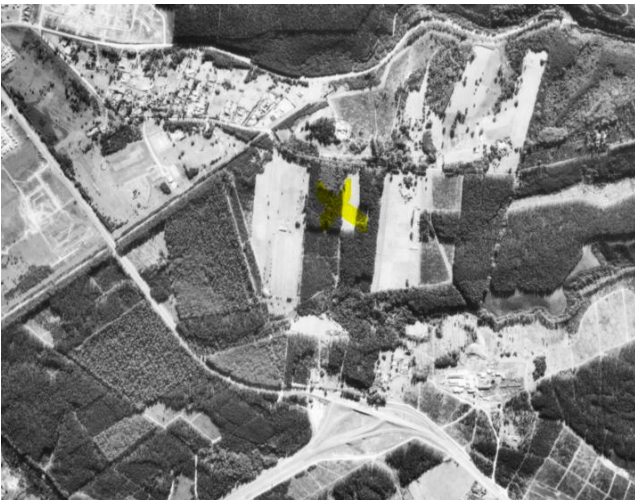


1936 historic image, location of the property is highlighted by the yellow cross

Use of the property for plantation purposes is evident on the 1973 – 2005 aerial images:



1973 historic image, location of the property is highlighted by the yellow cross



1989 historic image, location of the property is highlighted by the yellow cross



2005 Google Earth image

The high infestation levels are evident on the aerial photos until development commences in 2017, where ongoing alien clearing on the property has been implemented and the entire development area mowed each year.



2018 Google Earth image showing house construction in phase 1



Latest 2022 Google Earth image construction in phase 1 and 2. The remainder of the property consists of some alien invasive vegetation, and cultivation fields that are baled annually.



2023 aerial photo of the site and surrounding residential development area.

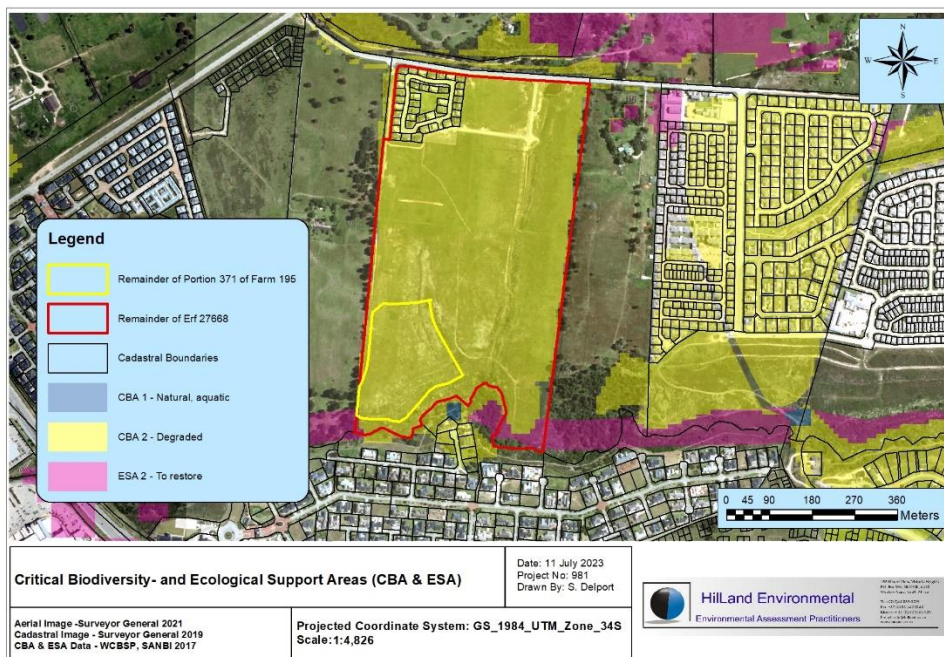
Overview of the vegetation on the property:



Wetland area in the foreground and mowed development area in the background.

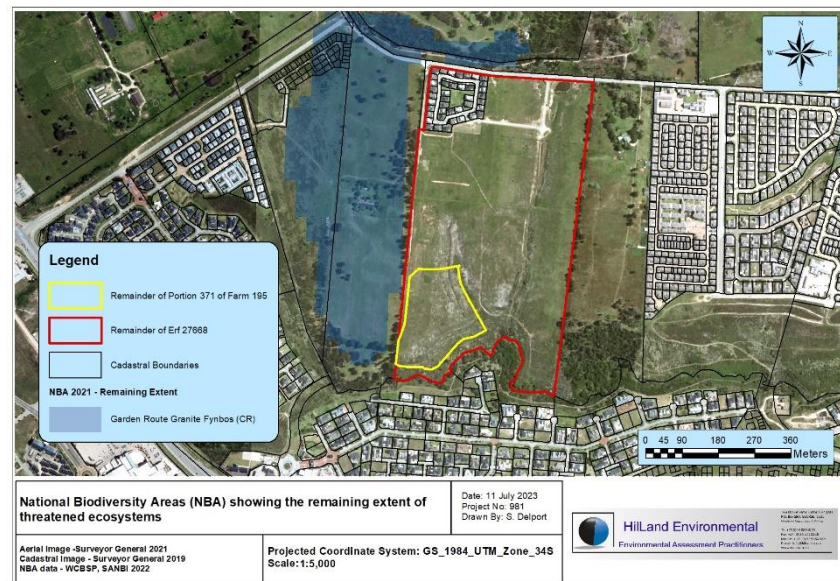
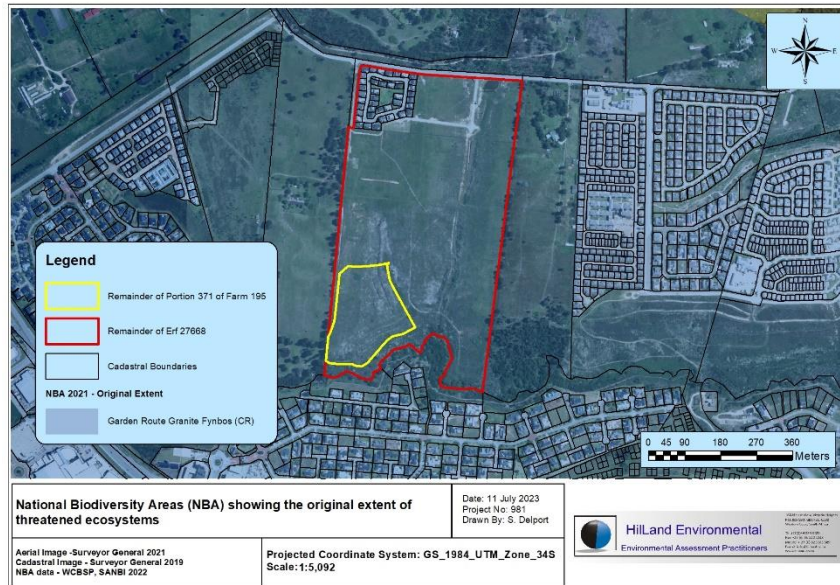
5.1.3 BIODIVERSITY MAPPING, SITE ASSESSMENT AND SPECIALIST FINDINGS

The Western Cape Biodiversity Spatial Plan (WCBS, 2017) maps the majority of the property as degraded Critical Biodiversity Areas (CBA 2). A small southern section forms part of Ecological Support Areas, to restore (ESA 2).



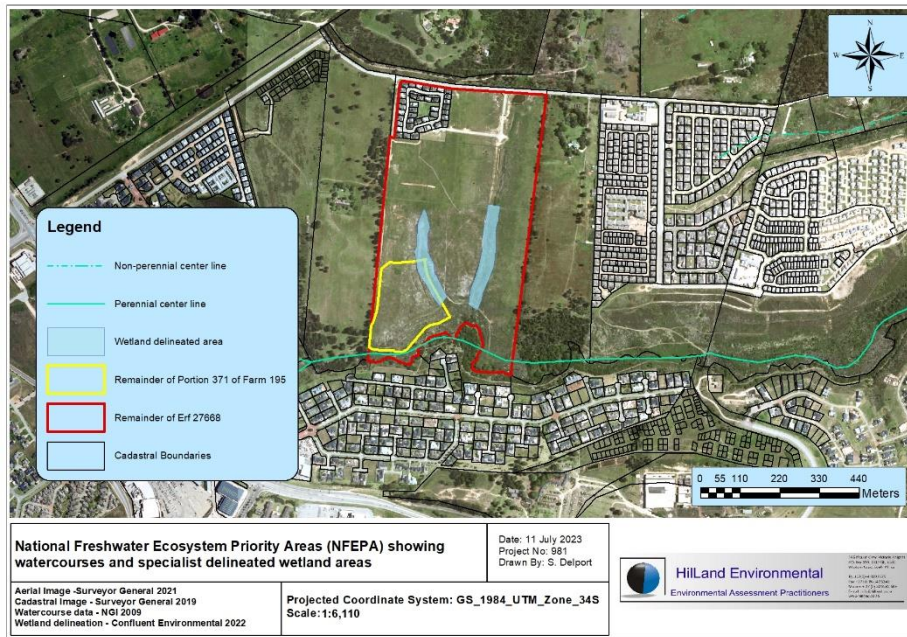
The National Biodiversity Areas (NBA, 2021) mapping of the original extent of threatened ecosystems includes the entire property as critically endangered Garden Route Granite Fynbos.

The clearance of vegetation on the property has commenced and the development zone associated with the amendment application consist of degraded fynbos vegetation and various grass and weed species as a result of continual historic disturbance and development. The only remaining natural vegetation is within the watercourses and delineated wetlands and has been reported on by the specialists required – Aquatic, Plant, Animal and Terrestrial biodiversity.



The National Freshwater Ecosystem Priority Areas (NFEPA data) maps, wetland buffer areas have been identified by the specialist, Confluent Environmental. The internal layout and stormwater management plan have been amended to accommodate these identified wetland areas. A WULA amendment application has been lodged with BOCMA by the specialist to authorise development within and adjacent to these wetland areas as specified in the stormwater management plan.

The buffer areas along the Modderrug River will be retained as open space zoning.



6 CONFIRMATION OF THEME SENSITIVITY AND ASSESSMENTS

Based on the site verification, the following table confirms/disputes the sensitivities as indicated in the screening tool report (Green shading highlights the rating proposed).

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity	EAP/Specialist confirmation / dispute of sensitivity
Agriculture theme		X Disputed			High sensitivity for agricultural theme is disputed. The sensitivity should be "none/zero" as: - The property falls <u>inside</u> the urban edge, has been approved for residential development which is already in progress. As the property is no longer set out for agriculture, no comment from Dept Agriculture is deemed necessary.
Animal species theme		X Disputed		X	Sensitivity is LOW as confirmed in the specialist compliance statement.
Aquatic biodiversity theme	X Disputed		X		Sensitivity is MEDIUM as confirmed by the specialist assessment The amendment already incorporates the recommendations provided by the specialist.
Archaeological and cultural heritage theme	X Disputed			X	Sensitivity should be LOW HWC confirmed that the comments provided in 2006, stating that no further assessments are required, still stands. No impact assessment therefore required by HWC.
Paleontological impact assessment	<p>The SAHRIS website, Kingswood has been highlighted as 'grey' which indicates that no palaeontological studies are required.</p>				

<small>For more information, go to Item 10.00 and 11.00 in the original (green) sensitivity map.</small> Colour Sensitivity Required Action				
RED	VERY HIGH			field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH			desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE			desktop study is required
BLUE	LOW			no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO			no palaeontological studies are required
WHITE/CLEAR	UNKNOWN			these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

HWC also confirmed that their 2006 comments requesting no additional studies still stand.

Based on this, no impact assessment/compliance statement is deemed necessary.

Civil aviation theme		X Disputed		X	High sensitivity for civil aviation theme is disputed. It must be substituted with a 'LOW' sensitivity based on the following reasons: - The proposed residential development will not have any impact on civil aviation aerodrome as it will be no different to the existing developed phases in Kraaibosch Park and the surrounding developments.
Defence theme				X	Confirm low sensitivity for defence theme. The proposal will not have an impact on this theme.
Plant species theme			X Disputed	X	The sensitivity should be LOW as confirmed in the compliance statement by the specialist.
Terrestrial biodiversity theme	X Disputed			X	
Hydrological assessment	Aquatic specialist and engineer have taken any aquatic hydrology constraints into account. The overall geology has been considered in the original application/ assessment. No new assessment is therefore required for the change in density of the development				
Visual/Landscape assessment and Socio-Economic assessment	The visual and socio-economic statement is included in the visual impact statement.				

7 CONCLUSION OF SITE SENSIVITY VERIFICATION

Based on the information available no additional specialist input/assessments are deemed necessary, other than the Aquatic assessment and the compliance statements for Terrestrial biodiversity, plants, animals, visual and the technical input in terms of engineering services.