HilLand Environmental

Environmental Assessment Practitioners

SITE SENSITIVITY VERIFICATION REPORT (SSVR)

FOR

THE PROPOSED RESIDENTIAL DEVELOPMENT ON PORTION 45 OF FARM 216, KNYSNA

Submitted by	HilLand Environmental
HilLand reference	KNY25/1308/03
Date	January 2026 (edited)

ISSUED BY:

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SITE SENSITIVITY VERIFICATION REPORT (SSVR) FOR PORTION 45 OF FARM 216

Submitted to:

DFFE REVIEW AND COMMENT – SUBMISSION WITH REQUEST FOR PRE-APP MEETING

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INTRODUCTION

HilLand Environmental (Pty) Ltd, independent Environmental Assessment Practitioners (EAPs), have been appointed by the applicant, **Bel Heights (Pty) Ltd**, to ensure compliance with the National Environmental Management Act (NEMA, No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended).

The proposal is to establish a residential estate on the property. The four (4) preexisting houses will be rebuilt, and an additional 10 single residential erven will be added and a communal garage area. The erven will vary between 1120m^2 and 1650m^2. The proposed residential erven will be consistent in size and architectural style with the surrounding Belvidere Heights Residential Estate.

Figure 1 Locality plan

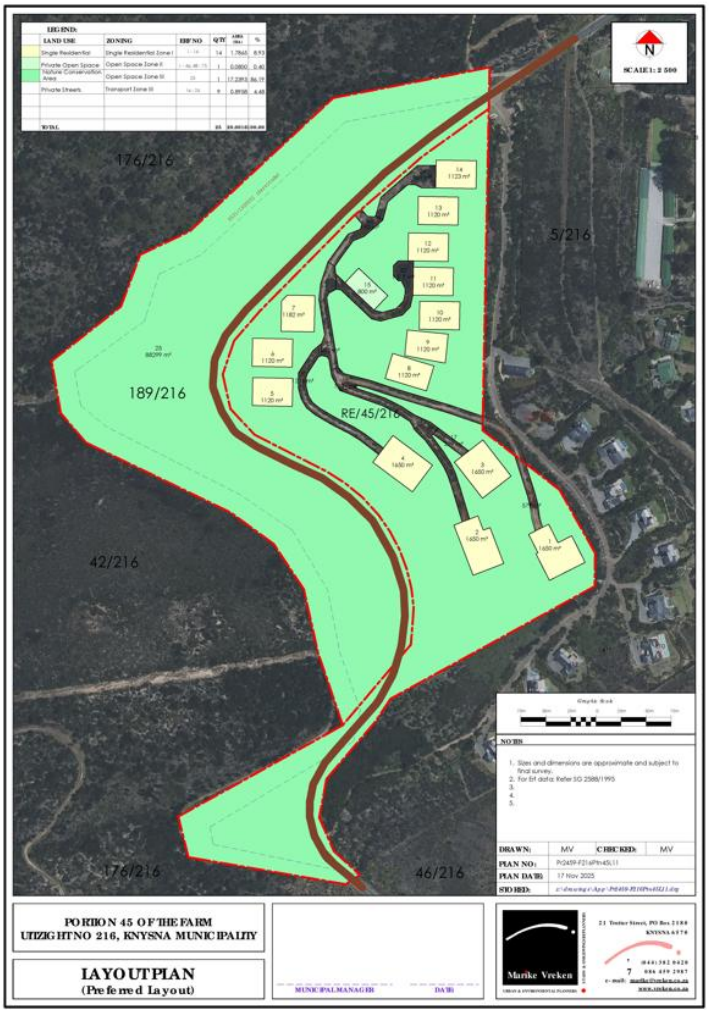

Figure 2 Site Development Plan

The proposed layout is specifically planned and designed taking into consideration the topography (contours), existing disturbed footprints, the existing internal roads, access and proposed access roads. The site slopes down towards the northeastern boundary of the property, with gentler slopes making it much more cost-effective and ensuring less earthworks to construct the dwelling units and road in this section of the property.

The remainder of the property will be zoned as private open space and conservation areas as per the proposed SDP.

Access to the development will be from Brenton Road via the existing access to the property. Existing internal tracks will remain in use and additional tracks will be created as shown on the SDP.

Associated services:

Water – water reticulation from the bulk water connection to be created at the Southwest corner of the property linking to the existing municipal water supply.

Electricity – the development will connect to the existing municipal electrical line that is available and internal cables will follow the tracks. Miniature substations will be installed as recommended by the engineers.

Solar will be installed where possible.

Sewage removal – sewage will connect to a new sewer reticulation gravitating to the Belvidere Estate sewage treatment works.

The Municipality has been requested to confirm civil and electrical services availability – will be included in the process.

Stormwater – stormwater will be SUDS system which will guide water to specially constructed detention ponds, the water will then soak away in the ponds which will be grass lined. The stormwater from the Belvidere-Brenton Road will be dealt with in the same way.

Refuse will be collected by the Municipality.

View towards the property from the Brenton access road

Alien clearing and control burn being undertaken by the FPA on the western portion above the Brenton Road.

Existing access tracks

Alien clearing in progress

Alien clearing in progress

Existing building

Remaining foundations of burnt home

PURPOSE OF THIS REPORT

This site sensitivity verification report forms part of the application for environmental authorisation for the proposal and has been 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 are 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.

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, HilLand Environmental, based on the following:

- Site visits.
- Historic application information (aerial imagery and historic environmental impact assessment done for the full 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).
- Specialist input – terrestrial- and aquatic biodiversity, plant and animal species specialists

RESULTS OF SCREENING TOOL

Application category:

- Transformation of land | indigenous vegetation (main activity)

SENSITIVITY THEMES

The table below serves to:

- Indicate the theme sensitivities identified in the screening tool report (24 November 2025).

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 for the property as a whole – not just the proposed development footprint:

<table>
<tr><th>Theme</th><th>Very High sensitivity</th><th>High sensitivity</th><th>Medium sensitivity</th><th>Low sensitivity</th><th>Reason for sensitivity rating</th></tr>
<tr><td>Agriculture theme</td><td></td><td>X</td><td></td><td></td><td>
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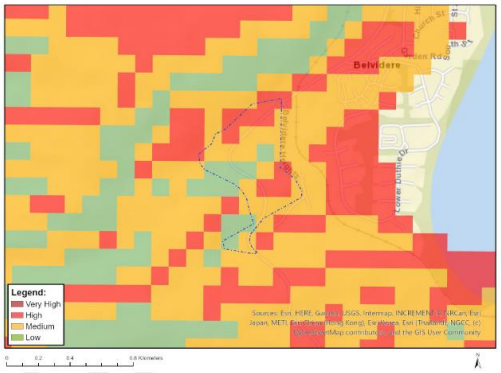

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<tr><th>Very High sensitivity</th><th>High sensitivity</th><th>Medium sensitivity</th><th>Low sensitivity</th></tr>
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Sensitivity Features:
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<tr><th>Sensitivity</th><th>Feature(s)</th></tr>
<tr><td>High</td><td>09. Moderate-High</td></tr>
<tr><td>High</td><td>10. Moderate-High</td></tr>
<tr><td>High</td><td>08. Moderate</td></tr>
<tr><td>Low</td><td>05. Low</td></tr>
<tr><td>Low</td><td>04. Low-Very low</td></tr>
<tr><td>Medium</td><td>07. Low-Moderate</td></tr>
<tr><td>Medium</td><td>06. Low-Moderate</td></tr>
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</td></tr>
<tr><td>Animal species theme</td><td></td><td>X</td><td></td><td></td><td>
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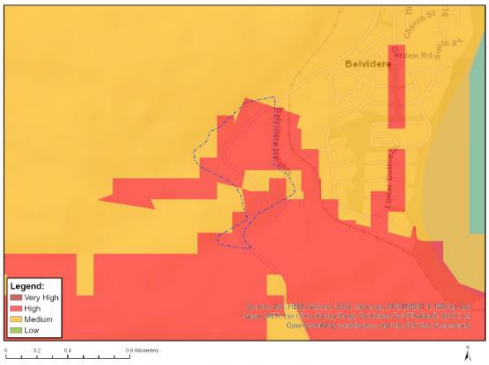

Where only a sensitive plant unique number or sensitive animal unique number is provided in the screening report and an assessment is required, the environmental assessment practitioner (EAP) or specialist is required to email SANBI at eiadatarequests@sanbi.org.za listing all sensitive species with their unique identifiers for which information is required. The name has been withheld as the species may be prone to illegal harvesting and must be protected. SANBI will release the actual species name after the details of the EAP or specialist have been documented.
<table>
<tr><th>Very High sensitivity</th><th>High sensitivity</th><th>Medium sensitivity</th><th>Low sensitivity</th></tr>
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Sensitivity Features:
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<tr><th>Sensitivity</th><th>Feature(s)</th></tr>
<tr><td>High</td><td>Aves-Circus ranivorus</td></tr>
<tr><td>High</td><td>Aves-Stephanoaetus coronatus</td></tr>
<tr><td>High</td><td>Aves-Bradypterus sylvaticus</td></tr>
<tr><td>Medium</td><td>Amphibia-Afrixalus knysnae</td></tr>
<tr><td>Medium</td><td>Insecta-Aloeides thyra orientis</td></tr>
<tr><td>Medium</td><td>Mammalia-Chlorotalpa duthieae</td></tr>
<tr><td>Medium</td><td>Sensitive species 8</td></tr>
<tr><td>Medium</td><td>Invertebrate-Aneuryphymus montanus</td></tr>
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<tr>
<td>Aquatic biodiversity theme</td>
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MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY


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Sensitivity Features:
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<tr><th>Sensitivity</th><th>Feature(s)</th></tr>
<tr><td>Very High</td><td>FEPA Subcatchment</td></tr>
<tr><td>Very High</td><td>SWSA (sw)_Outeniqua</td></tr>
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<tr>
<td>Archaeological and cultural heritage theme</td>
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MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY


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<tr><th>Sensitivity</th><th>Feature(s)</th></tr>
<tr><td>High</td><td>Within 50m of a Grade IIIc Heritage site</td></tr>
<tr><td>Very High</td><td>Within 2km of a Grade II Heritage site</td></tr>
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<tr>
<td>Civil aviation theme</td>
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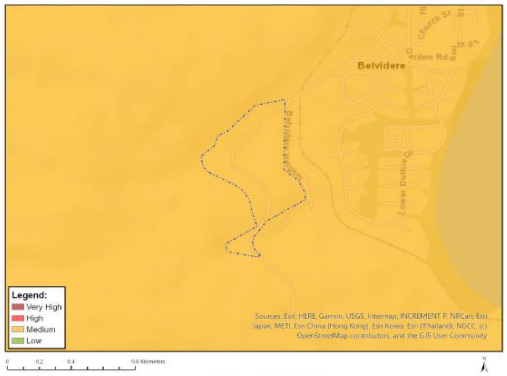
MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY


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Sensitivity Features:
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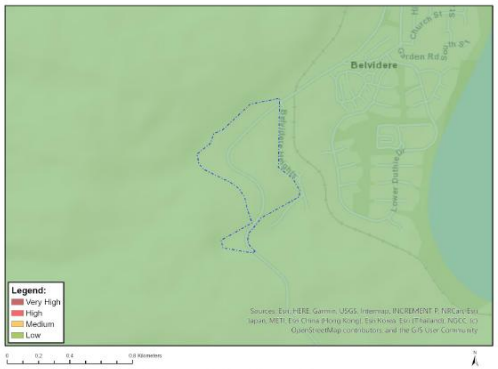

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<tr><th>Sensitivity</th><th>Feature(s)</th></tr>
<tr><td>Low</td><td>Low Sensitivity</td></tr>
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<td>Paleontology theme</td>
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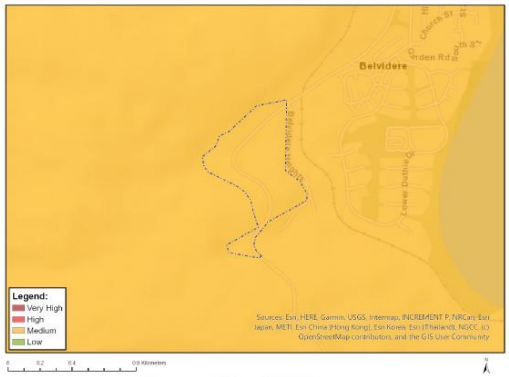

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</table>
Sensitivity Features:
<table>
<tr><th>Sensitivity</th><th>Feature(s)</th></tr>
<tr><td>Medium</td><td>Features with a Medium paleontological sensitivity</td></tr>
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<table>
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<td>Plant species theme</td>
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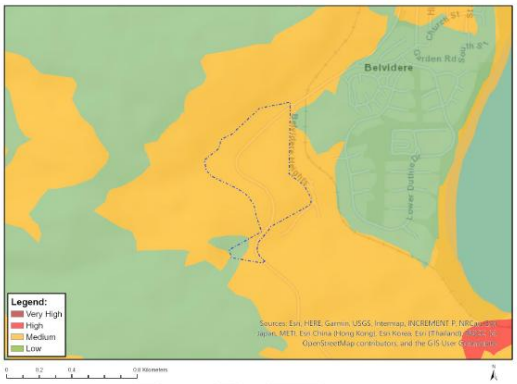
MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY


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</table>
Sensitivity Features:
<table>
<tr><th>Sensitivity</th><th>Feature(s)</th></tr>
<tr><td>Low</td><td>Low Sensitivity</td></tr>
<tr><td>Medium</td><td>Lampranthus fergusoniae</td></tr>
<tr><td>Medium</td><td>Lampranthus pauciflorus</td></tr>
<tr><td>Medium</td><td>Ruschia duthiae</td></tr>
<tr><td>Medium</td><td>Lebeckia gracilis</td></tr>
<tr><td>Medium</td><td>Wahlenbergia polyantha</td></tr>
<tr><td>Medium</td><td>Selago burchellii</td></tr>
<tr><td>Medium</td><td>Sensitive species 419</td></tr>
<tr><td>Medium</td><td>Erica glandulosa subsp. fourcadei</td></tr>
<tr><td>Medium</td><td>Sensitive species 1024</td></tr>
<tr><td>Medium</td><td>Sensitive species 1032</td></tr>
<tr><td>Medium</td><td>Muraltia knysnaensis</td></tr>
<tr><td>Medium</td><td>Nanobubon hypogaeum</td></tr>
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<tr><td>Medium</td><td>Sensitive species 53</td></tr>
<tr><td>Medium</td><td>Pterygodium cleistogamum</td></tr>
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<tr>
<td>Terrestrial biodiversity theme</td>
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MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY


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<tr><td>Very High</td><td>SWSA (sw)_Outeniqua</td></tr>
<tr><td>Very High</td><td>Knysna National Lake Area</td></tr>
<tr><td>Very High</td><td>CR_Knysna Sand Fynbos</td></tr>
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ASSESSMENTS IDENTIFIED IN THE SCREENING TOOL REPORT

The screening tool identified the following assessments as being potentially necessary 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);
- Socio-economic impact assessment (general protocol);
- Plant species assessment (plant species assessment protocol);
- Animal species assessment (animal species assessment protocol);

RESULTS OF SITE VERIFICATION

DESKTOP ASSESSMENT

BIODIVERSITY MAPPING, SITE ASSESSMENT

The National Biodiversity Areas (NBA) maps the original extent of threatened ecosystems – the property falls within CR Knysna Sand Fynbos. The remaining extent mapping indicates partial transformation on the property. The specialist assessment of the site has confirmed that there is no remaining Knysna Sand Fynbos on site.

The Western Cape Biodiversity Spatial Plan (WCBSP,2023) maps the property as forming part of Knysna Lakes Area PE.

Knysna fires of 2017 went through the property, destroying vegetation and homes. There has been extensive regrowth of alien vegetation since the fire, which the new owners are systematically removing in accordance with an approved ACP in terms of NEMBA.

There is an existing main road running through the site, which is the access road to Brenton.

Figure 3 Aerial photos before and after the 2017 fires.

A specialist assessment has been undertaken by Dr D Hoare confirming the following:

A total of 74 plant species were recorded on site (Appendix 1). Thirteen of these are not indigenous, consisting of either alien invasive species or cultivated species. The high proportion of alien invasive species and weeds indicates historically high levels of disturbance on site.

Of the indigenous species recorded on site, the majority are weeds, weedy species, or primary colonisers of disturbed sites (Appendix 1). A small number of fynbos species were found on site within a very restricted locality.

None of the plant species found on site are of conservation concern.

None of the species recorded on site are protected under the National Environmental Management: Biodiversity Act No 10 of 2004.

There are two tree species protected under the National Forest Act, 1998 (Act No. 84 of 1998) on site, namely Sideroxylon inerme (milkwood) and Pittosporum viridiflorum.

Habitats on site

The entire site is completely dominated by alien vegetation, either with current dense stands of aliens, or recently cleared, or with a recent growth of grass and weed-dominated secondary vegetation. Alien and invasive species found on site include Acacia cyclops (NEMBA AI Category 1b), Acacia longifolia* (NEMBA AI Category 1b), Acacia mearnsii* (NEMBA AI Category 1b), Eucalyptus sp* (NEMBA AI Category 3), Rubus sp*, Lantana camara* (NEMBA AI Category 1b), and Psidium guajava* (NEMBA AI Category 1b). Species found on site that are typical of secondary vegetation in previously cleared areas on the Knysna Western Head include Arctotheca prostrata, Carpobrotus edulis, Cynodon dactylon, Cyperus polystachyos, Ehrharta erecta, Eragrostis capensis, Eragrostis curvula, Erigeron bonariensis*, Felicia echinata, Ficinia nigrescens, Pentameris sp, Helichrysum foetidum, Helichrysum petiolare, Hyparrhenia hirta, Hypoxis sobolifera, Indigofera verrucosa, Leonotis leonurus, Lobelia tomentosa, Megathyrsus maximus, Melinis repens, Montinia caryophyllacea, Osteospermum moniliferum, Oxalis ciliaris, Rumex sagittatus, Rhynchosia caribaea, Selago canescens, Selago corymbosa, Selago dolosa, Senecio ilicifolius, Seriphium plumosum, Solanum nigrum*, Tagetes minuta*, Ursinia scariosa and Withania somnifera. The high grass cover and relatively high number of grass species is typical of this secondary vegetation and is an important step in the successional process towards the re-establishment of more indigenous species.*

There are also patches dominated by kikuyu grass (Cenchrus clandestinus) around previous dwellings. These were probably previously lawn areas. Some of the species found on site are probably garden escapes, or remnants of previous gardens, including Crassula multicava, Ficus burkei, Kalanchoe rotundifolia, Lampranthus multiradiatus, Nuxia floribunda, Oenothera lindheimeri*, Protea cynaroides and Quercus robur*.*

Along the driveways on site several thicket species have become established. This is a typical pattern in the Garden Route along fence lines - most thicket species are bird-dispersed, and they perch on fences, powerlines, poles and other vertical infrastructure from which seeds are dropped onto the ground below. Those found on site are *Diospyros dichrophylla, Grewia occidentalis, Halleria lucida, Pittosporum viridiflorum* (Protected NFA), *Podalyria myrtillifolia, Polygala myrtifolia, Pterocelastrus tricuspidatus, Searsia lucida, Sideroxylon inerme* (Protected NFA), *Tarchonanthus littoralis* and *Virgilia divaricata*.

Figure 4 Habitats on site (D. Hoare, 2024)

There is one patch of secondary fynbos on site that includes several fynbos species, including Aspalathus spinosa, Erica discolor, Erica leucopelta, Erica sparsa, Thamnochortus sp, Leucadendron salignum, Passerina corymbos, Phylica purpurea, Pteridium aquilinum and Restio triticeus."

Site ecological importance	Interpretation in relation to proposed development activities
Very high	Avoidance mitigation – no destructive development activities should be considered. Offset mitigation not acceptable/ not possible (i.e. last remaining populations of species, last remaining good condition patches of ecosystems/ unique species assemblages). Destructive impacts for species/ecosystems where persistence target remains.
High	Avoidance mitigation wherever possible. Minimisation mitigation – changes to project infrastructure design to limit the amount of habitat impacted; limited development activities of low impact acceptable. Offset mitigation may be required for high impact activities.
Medium	Minimisation and restoration mitigation – development activities of medium impact acceptable followed by appropriate restoration activities.
Low	Minimisation and restoration mitigation – development activities of medium to high impact acceptable followed by appropriate restoration activities
Very low	Minimisation mitigation – development activities of medium to high impact acceptable and restoration activities may not be required.

Figure 5 Site Ecological Importance (D. Hoare, 2024) (note this was a previous layout plan – now replaced)

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 where the rating is disputed).**

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity	Specialist assessment/statement to be done or not	Motivation
Agriculture theme		**X**		**X**	Yes	Compliance statement by specialist being done. Sensitivity low based on the historic uses and topography – never used for agriculture.
Animal species theme		**X**		**X**	Yes	None of the species listed by the screening tool were identified by the specialist on the site. The specialist confirmed that there are no suitable habitats on site. As confirmed by the specialist – compliance statement is required *The site is within the buffer of the Knysna National Lake Area and the Garden Route National Park and is within a FEPA Subcatchment and the Outeniqua SWSA. The habitat on site is not currently supportive of any of these sensitivities, although it could be partially rehabilitated to an ecologically functional state.* ***The site therefore has LOW sensitivity with respect to the Terrestrial Biodiversity Theme.***
Aquatic biodiversity theme	**X**			**X**	Yes	There are no aquatic features on the property that will be affected = confirmed by the specialist
Archaeological and cultural heritage theme	**X**				No	HWC confirmed that no further studies are required
Civil aviation theme			**X**	**X**	No	No impact on the civil aviation, existing homes on an existing property surrounded by similar homes on neighbouring properties with no changes to the landscaped that would impact on civil aviation – dispute sensitivity.
Defence theme				**X**	No	No impact, no change
Paleontology theme			**X**		No	HWC confirmed that no further studies are required
Plant species theme			**X**	**X**	Yes	None of the species listed by the screening tool were identified by the specialist on the site. The specialist confirmed that there are no suitable habitats on site. As confirmed by the specialist – compliance statement is required ***No impacts on Terrestrial Biodiversity, Animals or Plant sensitivities will occur because of the development of the site.***

Terrestrial biodiversity theme	**X**			**x**	Yes	As confirmed by the specialist – compliance statement is required *The habitat on site is not currently supportive of any of these sensitivities, although it could be partially rehabilitated to an ecologically functional state.* ***The site therefore has LOW sensitivity with respect to the Terrestrial Biodiversity Theme.*** ***No impacts on Terrestrial Biodiversity, Animals or Plant sensitivities will occur because of the development of the site.***

The sensitivities which have been disputed are confirmed in the Specialist report and a compliance statement has therefore been undertaken and not an impact assessment.

Additional recommended studies (not linked to a theme):

Visual assessment – to be done and form part of the assessment

Socio-Economic – the proposal is in line with the SDF and Municipal planning for the area, socio-economic aspects will be addressed in the draft BAR.

CONCLUSION

Based on the above, the small scale of the project cannot be reflected through the use of the national screening tool which does not capture the site-specific conditions and applicable aspects.

These will be covered as part of the Basic Assessment process:

- Terrestrial biodiversity, plant and animal **compliance statement**
- Aquatic **compliance statement**
- HWC to comment on an NID and HWC confirmed that no further studies are required
- Agricultural **compliance statement**.
- Visual **compliance statement**.