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SITE SENSITIVITY VERIFICATION REPORT

FOR THE

PROPOSED MIXED-USE RESIDENTIAL DEVELOPMENT ON ERF 266 AND A PORTION OF ERF 21 IN RIVERSDALE, HESSEQUA LOCAL MUNICIPALITY, GARDEN ROUTE DISTRICT MUNICIPALITY, WESTERN CAPE PROVINCE.

APPLICANT:	Belladonna (Pty) Ltd
ENVIRONMENTAL CONSULTANT:	SHARPLES ENVIRONMENTAL SERVICES CC RESPONSIBLE EAP: MADELEINE KNOETZE (EAPASA REG: 2021/3230) OVERSEEING EAP: BETSY DITCHAM (EAPASA REG: 2020/1480)
SES REFERENCE NUMBER:	CT18/RHD/SSVR/03/25
DEADP REFERENCE:	TBC
DATE:	13 March 2025

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1. INTRODUCTION

Sharples Environmental Services cc (SES) has been appointed by Belladonna (Pty) Ltd, to oversee the environmental processing in accordance with the Environmental Impact Assessment (EIA) Regulations of 2014, as amended (GNR 326 of 2017; GNR 517 of 2021) promulgated in terms of the National Environmental Management Act, 1998 (Act 107 of 1998), as amended (NEMLAA; Act 2 of 2022), for the proposed mixed-use housing development on Erf 266 and a portion of Erf 21, Riversdale Settlement, Hessequa Local Municipality, Garden Route District Municipality, Western Cape Province.

Originally, Kapp Environmental Consulting was appointed to oversee the process, but the project has been reallocated to SES.

The proposed development entails the establishment of a mixed-use development. The development will consist of the following topologies:

Topology	Land Use	Number of erven	Area
Agricultural Zone II	Gated estate – Limited small scale agricultural activities	Up to 27	27.5 ha
Single Residential Zone I	Proposed density of 15 units per hectare – Not within a gated estate	Up to 159	10.4 ha
General Residential Zone II	Retirement Estate	Up to 3 portions	10.4 ha
Business Zone III	Neighbourhood shop (Convenience store)	Up to 1	0.7 ha
Utility Zone	Primarily a communal refuse area and will be equipped with a water reservoir – for private use by the gated community	Up to 1	0.2 ha
Open Space Zone I	Public Open Space	Up to 3	1.5 ha
Transport Zone II	Public Street	-	3.8 ha
Transport Zone III	Private Road	-	1.9 ha
Total Area:			**56.4 ha**

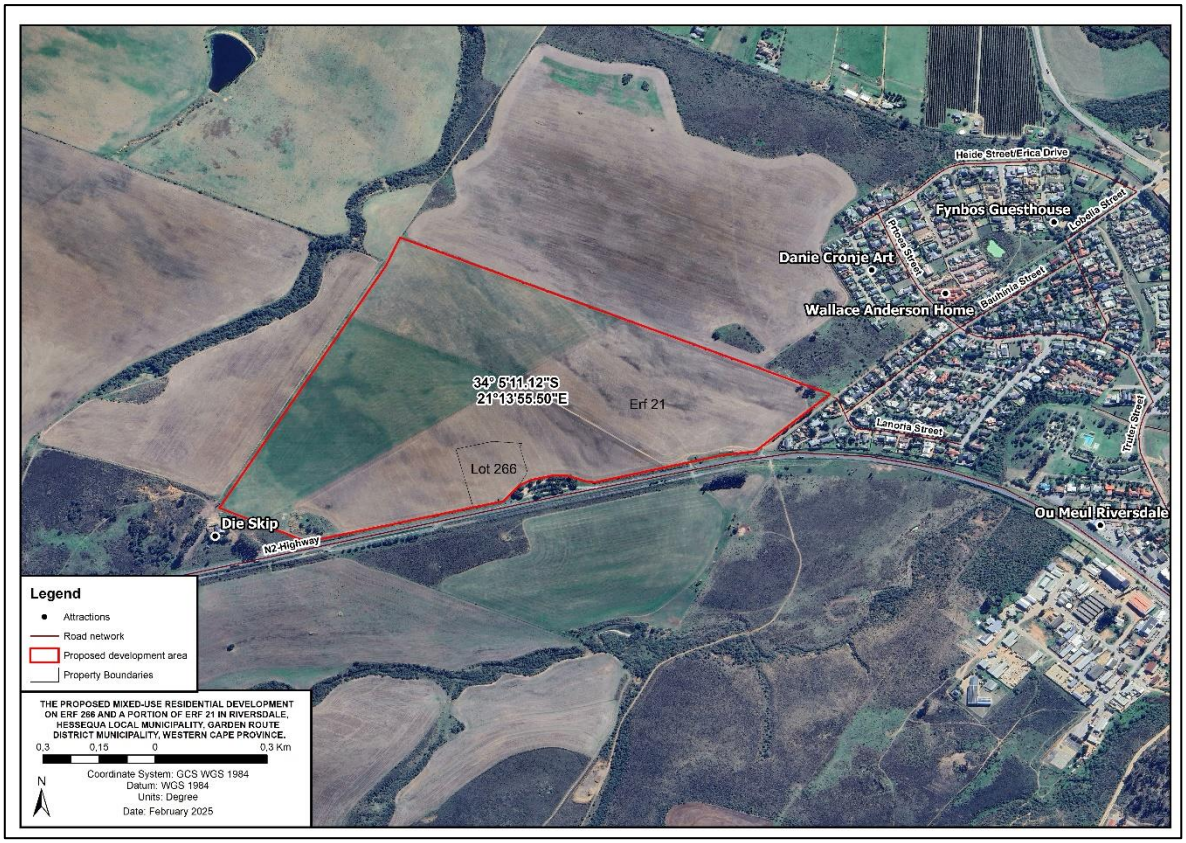

Figure 1: Locality Map (1:7 500)

Table 1: Property Details of Proposed Development Location

No	Farm Name	Farm/ Erf No	Portion	Latitude	Longitude	Property Type
1	RIVERSDALE SETTLEMENT	21	0	34°5'8.99S	21°13'53.66E	Erven
2	RIVERSDALE SETTLEMENT	266	0	34°5'17.96S	21°13'56.2E	Erven

A sensitivity screening tool report was produced for the proposed project using the Department of Forestry, Fisheries and the Environment's (DFFE) Web-based National Environmental Screening Tool extract on 28 February 2025. This Site Sensitivity Verification Report (SSVR) reports on the ground truthing undertaken to verify the indicated sensitivity ratings of the screening report, and to motivate why specific specialist studies recommended by the screening report, will or will not be undertaken for the proposed development.

2. FINDINGS OF THE SCREENING TOOL

The National Sector Classification Category selected to produce the Screening Tool Report for the proposed development on Erf 266 and the Remaining portion of Erf 21, Riversdale Settlement, was as follow:

Transformation of land | From Agriculture or afforestation.

2.1. Wind and solar developments

The following wind and solar developments have approved Environmental Authorisations or applications under consideration within a 30 km radius of the proposed area:

No	EIA Reference No	Classification	Status of application	Distance from proposed area (km)
1	12/12/20/1815/3	Wind	Approved	27.8

2.2. Environmental Management Frameworks

No intersections with EMF areas found.

2.3. Relevant Development Incentives, Restrictions, Exclusions or Prohibitions

The following development incentives, restrictions, exclusions, or prohibitions apply to the proposed site:

Incentive, restriction or prohibition	Implication
Strategic Gas Pipeline Corridors-Phase 1a & 1b: Saldanha to Ankerlig and Saldanha to Mossel Bay	https://screening.environment.gov.za/ScreeningDownloads/DevelopmentZones/Combined_GAS.pdf

2.4. Environmental Sensitivities

The following summary of the development footprint environmental sensitivities is identified by the screening report (Table 2). Only the highest sensitivity for the respective themes is indicated. The environmental sensitivities for the proposed development footprint as identified by the screening report, are only indicative and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Table 2: Summary of Specialist Assessments Identified

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		
Defense Theme				X
Paleontology	X			
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

2.5. Screening tool recommended specialist studies:

Based on the selected classification and the environmental sensitivities determined by the Screening Tool, the following list of specialist assessments are recommended for inclusion in the environmental assessment process. It is the responsibility of the **EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist assessments.**

Please note: This report details the Sensitive Species expected within the proposed development footprint. Therefore, **this report may not be distributed** to the public.

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

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

3. SITE VERIFICATION

The initial site inspection for this report was undertaken by the Environmental Assessment Practitioner (EAP):

- Date: 25 February 2025
- EAP name: Ms. Madeleine Knoetze and Mrs. Betsy Ditcham
- EAPASA Reg Nr: 2021/3230 and 2020/1480

After desktop consideration of the development site, various specialists were appointed to verify and contribute to the environmental impacts the project may have and seek a deeper understanding of the best plan from an environmental perspective. The sections below provide the screening tool findings, EAP site verification findings, and the Specialist verification findings, where applicable.

3.1. Agriculture Theme

Screening Tool: The report indicates that the land capability is moderate-high (with annual crop cultivation present on affected property), resulting in the **Very High** sensitivity rating and recommends that an Agricultural Impact Assessment be conducted.

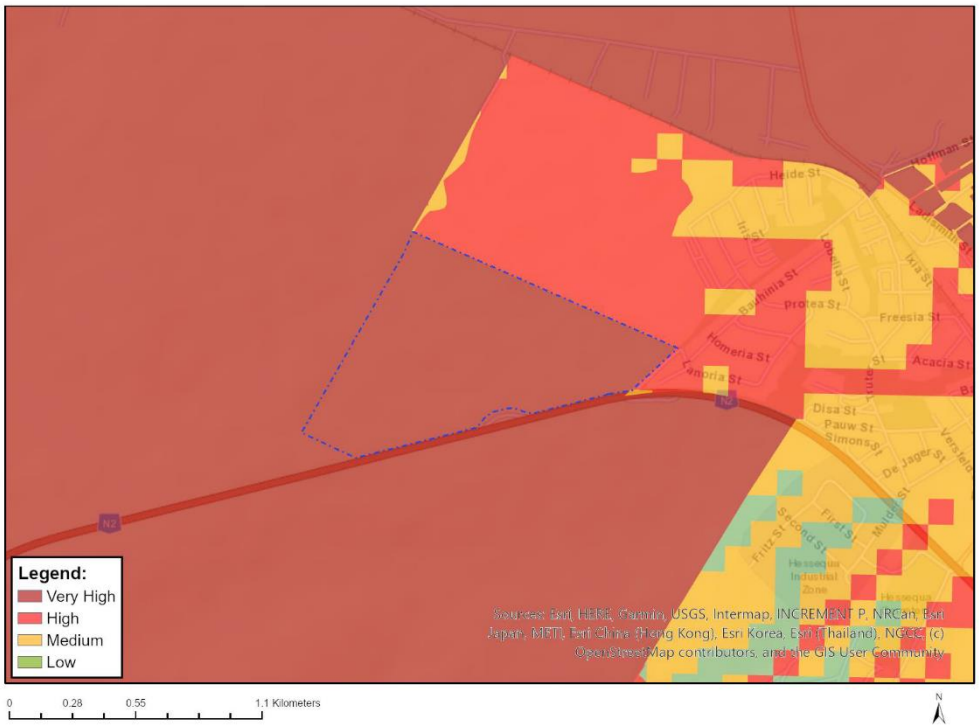

Figure 2: Relative Agricultural Theme Sensitivity Map

Sensitivity	Feature(s)
Medium	06. Low-Moderate
Medium	07. Low-Moderate
High	Rainfed Annual Crop Cultivation / Planted Pastures

High	08. Moderate
High	09. Moderate-High
Very High	Heidelberg-Slangrivier PAA

Desktop Assessment and On-site Observations by the EAP:

The DFFE Screening Tool's agricultural land capability data have been obtained through the DAFF 2016 Draft Land Capability dataset. This dataset categorises the country into 15 different classes, which have been sub-categized into 4 classes. The dataset was generated through GIS modelling. As per the Departmental description of 'land capability', the value of the land capability is determined by the interaction of climate, soil and the terrain for the purpose of intensive long-term use of land for the purposes of rainfed farming (DAFF, 2017).

According to the database for the Protected Agricultural Areas, as delineated by the National Department of Agriculture, Land Reform and Rural Development in 2020, the proposed development is located in the Heidelberg-Slangrivier area. These areas have been defined based on land capability, crop suitability, agricultural land use, irrigated agricultural areas, and plantations, These areas excluded Protected Areas in terms of the National Environmental Management: Protected Areas Act, 2003 (NEMPAA; Act No. 57 of 2003), areas within an urban edge demarcated prior to 1994 and permanently transformed areas (waterbodies, buildings etc). Based on the background information document provided with the dataset, the Protected Agricultural Areas (PAA) have been divided into watering types (Rainfed vs Irrigated) and Priority level (with A being of Highest priority and F the lowest). The proposed development is located within a Rainfed PAA with a priority rating of B.

The proposed development site is currently zoned as Agricultural Zone I and Business Zone VI, and the full extent of the proposed development site is actively being used for rainfed cultivation.

Based on the findings of the site visit undertaken by the EAPs, it was confirmed that the Agricultural Sensitivity for the proposed development site was High, therefore an Agricultural Assessment would be required to inform the contents of the Impact Assessment reporting.

Figure 3: Photographic representation of the agricultural practices on site.

Site sensitivity verification of the Specialist: The classified land capability of the site ranges from 6 to 9. The specialist verifies that most of the site is within crop boundaries and verifies the classified land capability, based on the assessment of the cropping potential of the site. This verification therefore confirms the high sensitivity rating by the screening tool. The following parameters were identified as relevant to the agricultural production potential of the site:

- Geology – Conglomerate, sandstone and mudstone of the Uitenhage Group as well as shale of the Bokkeveld Group, occasionally overlain by Tertiary silcrete.
- Land type – Dc32 and Fb31
- Description of soils – Shallow to deep, medium textured, imperfectly drained soils with a high stone content, on underlying, dense clay.
- Dominant soil forms – Klapmuts, Sepane
- Soil capability classification (out of 9) – 3 (low to 5 (moderate)
- Soil limitations – High stone content, drainage limitations, shallow depth in places
- Agricultural land use in the surrounding area – Predominantly small grain farming, but
- Agricultural land use on the site – Small grain cultivation
- Land capability classification (out of 15) – 6 (low-moderate) to 9 (moderate-high)
- Within a Protected Agricultural Area - Yes

Conclusion and Way Forward: Johann Lanz (SACNASP Reg. 400268/12) has indicated that the the impact can confidently be assessed based on existing information, without the detailed site investigation that is required for an Agricultural Agro-Ecosystem Specialist Assessment. Therefore, an **Agricultural Compliance Statement** (in line with the relevant protocol) **will be** included as part of the reporting for the Basic Assessment Process. The Provincial Department of Agriculture (DoA) will be included as a Stakeholder as part of the Public Participation Process (PPP).

3.2. Animal Species

Screening Tool: The report indicates that the animal sensitivity rating is **High** and recommends an Animal Species Assessment be conducted.

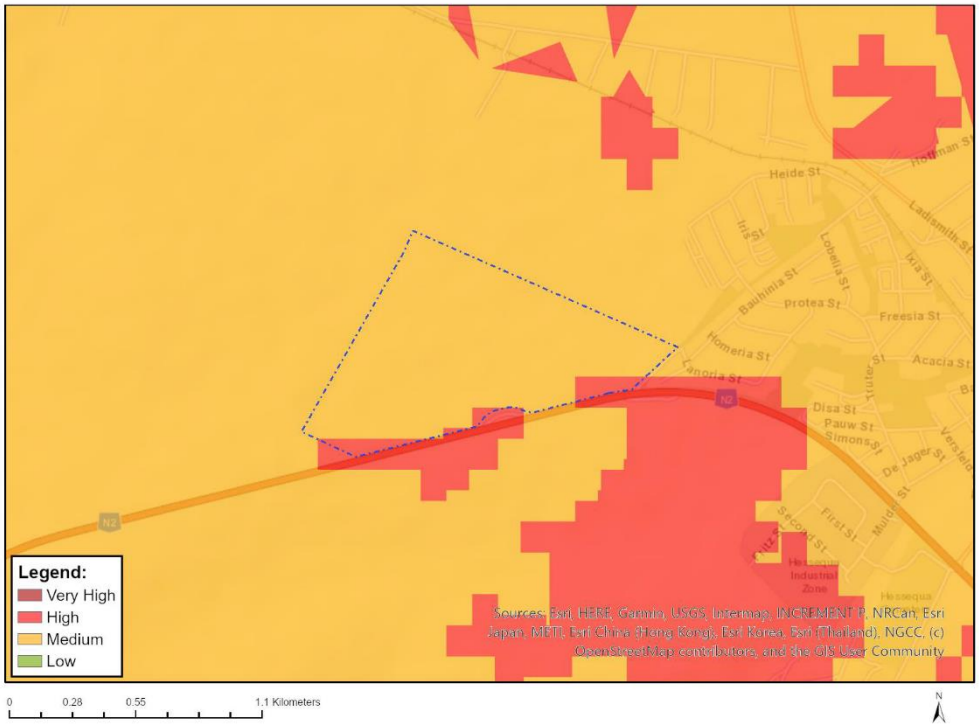

Figure 4: Relative Animal Species Theme Sensitivity Map

Sensitivity Features

Sensitivity	Feature(s)	Common name
Medium	Invertebrate-*Aneuryphymus montanus*	Yellow-winged Agile Grasshopper
Medium	Aves-*Circus ranivorus*	African marsh harrier
High	Aves-*Neotis denhami*	Denham's bustard
High	Aves-*Afrotis afra*	Southern black korhaan

Observation on Site - by the EAP:

During the site visit conducted by the EAP it was observed that the proposed development site was used predominantly for rainfed agricultural practices with the exception of two small portions (one on the eastern boundary of the site, and another on the western boundary of the site (next to the N2-Highway)). During the site visit conducted by the EAP, the Species of Conservation Concern (SCCs) were sought after, however the presence of any of the SCCs could not be confirmed during the site visit. It was however observed that two Blue Cranes (*Grus paradisea*) (listed as Vulnerable in terms of the IUCN) were foraging in the freshly harvested farmlands.

Figure 5: Photographic representation of the animal species located on site. The photo on the left indicates two Blue Cranes foraging in the freshly harvested fields and the photo on the right indicates a small flock of finches resting on the fence.

The iNaturalist findings of the site (though concentrated along the N2-Highway), indicated that overall, 126 species (including animal and plant species) were observed in the viewing extent. Of these species, 30 species were animal species. No species of conservation concern highlighted in the screening tool were observed by either the EAP or the contributors of iNaturalist (as accessed on 11 March 2025). One observation of Danaid Eggfly (*Hypolimnas misippus)* was recorded in the rest areas adjacent to the proposed development site.

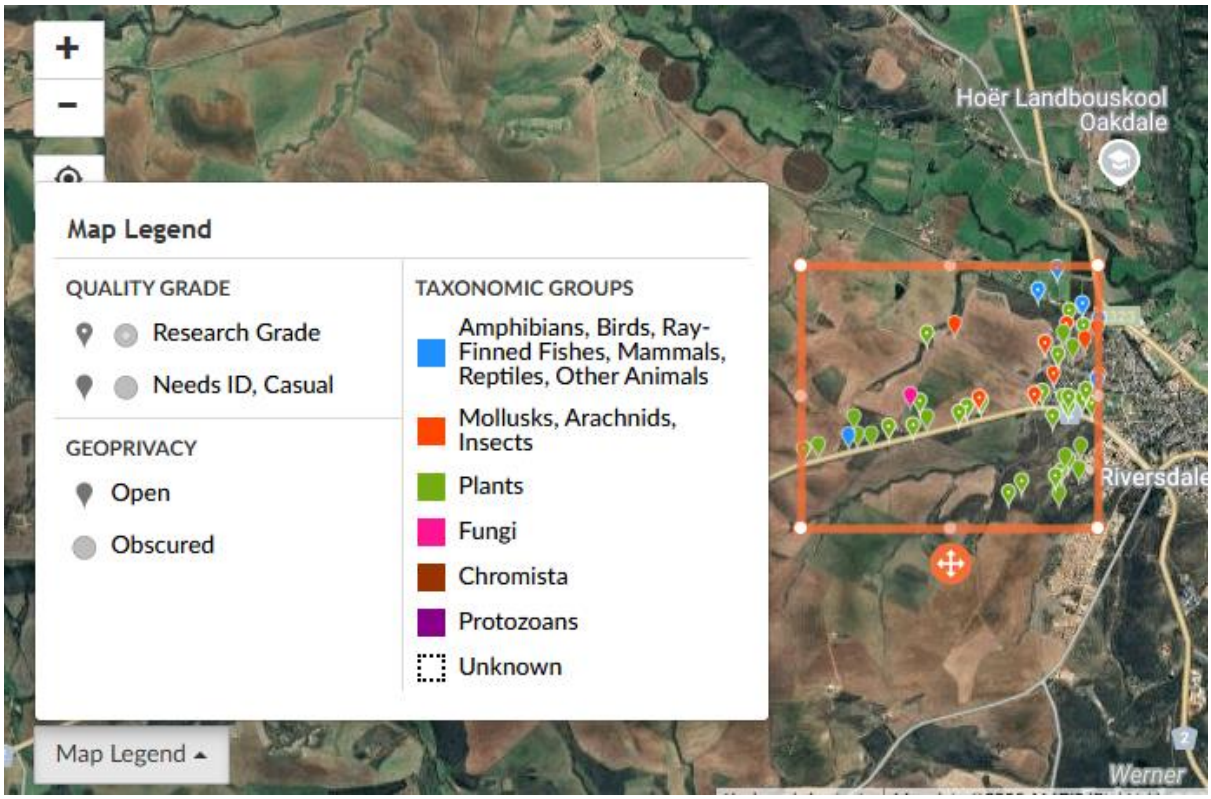

Figure 6. iNaturalist contributions to the study area and surrounds,

Specialist findings: Mr. Willem Matthee and Professor Jan Venter (from the Nelson Mandela University – George Campus) were appointed to undertake the Site Sensitivity Verification of the Animal Species for the proposed development. It was determined that during the site visit,

a total of 22 animal species were recorded, with one amphibian, 14 bird species, one gastropod, five insect species, and one mammal species being recorded.

Notable observations included a total of four Blue Cranes (*Grus paradisea*) feeding in the harvested fields on the property, Common Quail (*Coturnix coturnix*) calling from the cultivated fields, and the dung of Steenbok (*Raphicerus campestris*) in the harvested fields. It was noted by the specialist that, these cultivated fields (both while under cultivation, and after being harvested) provide a habitat for the species recorded, but there is an abundance of similarly suitable habitat for these species in surrounding areas, and the development is unlikely to have a major impact on the continued survival of these species in this area.

Concluding remarks: Due to the overall Low sensitivity of the proposed development site and the impact of the proposed development activities on the animal species recorded on site, an **Animal Species Compliance Statement** has been compiled by Mr. Willem Matthee and Professor Jan Venter (SACNASP Reg. 400111/14), in accordance with the Animal Species Protocols (GN 1150 of October 2020), **would be** included in the Basic Assessment Reporting. Furthermore, CapeNature will be included as a Stakeholder during PPP to be conducted for the proposed development.

3.3. Aquatic Biodiversity & Hydrology

Screening Tool: The report indicates that the site's Aquatic Biodiversity is of **Very High** sensitivity and that an Aquatic Biodiversity Impact Assessment is required.

Sensitivity Features

Sensitivity	Feature(s)
Low	Low sensitivity
Very High	SWSA (SW) _Langeberg
Very High	Wetlands_East Coast Renosterveld Bioregion (Depression

Figure 7: Relative Aquatic Biodiversity Theme Sensitivity Map

Desktop investigation and Observation on Site - by the EAP:

During the site visit undertaken by the EAP, no watercourses were identified on site. It is acknowledged that the site visit for the proposed development was undertaken before the start of the rain season in this area. A low order tributary of the Naroo River (feeding into the Vet River located toward the West) is approximately 56 m from the northern boundary of the proposed development site. Furthermore, the National Wetland Map 5 (NWM5, 2018) has identified a wetland in the centre of the proposed development site. Please see the Figure 8 below for the approximate location (based on the desktop assessment) of the proposed development in relation to the identified drainage lines on site. Please note, in terms of the Biodiversity Spatial Plan (BSP, 2023), no Aquatic Critical Biodiversity Areas (CBAs) or Ecological Support Areas (ESAs) are located on site. Similarly, no aquatic CBAs or ESAs were identified as part of the 2017 BSP. However, it is acknowledged that a ESA2: Restore from other land use had been identified in the proposed development site as part of the 2017 BSP. This delineation aligns with the NWM5 delineation. This has ESA has been removed from the 2023 BSP.

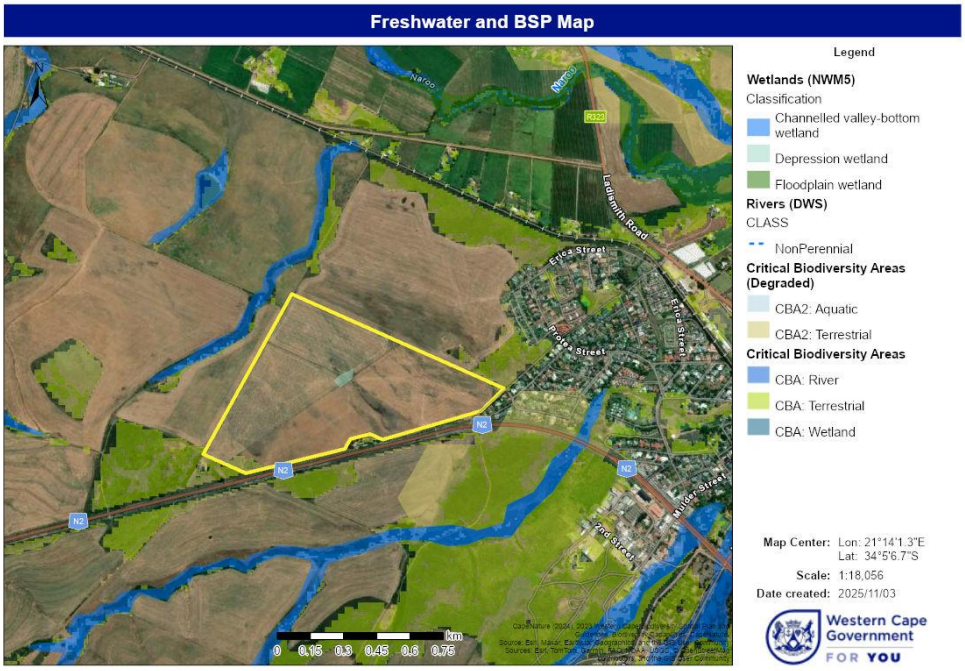

Figure 8. Freshwater and Biodiversity Spatial Plan (2023), NWM5 and river delineations for the proposed development area.

Specialist findings: According to the findings of the Aquatic Biodiversity Specialist (Dietmar de Klerk), appointed to undertake the Aquatic Biodiversity Site Sensitivity Verification, it was confirmed that the wetland identified by the NWM5 (2018) was present on site. The wetland's boundaries were refined based on field based observations (Figure 9).

Figure 9. Rivers and Wetlands associated with the site or in vicinity of the site (Dietmar de Klerk, 2023).

Concluding remarks: Based on the findings of the specialist, and the confirmation of the presence of a watercourse, the sensitivity of the proposed development area is considered to be High. An **Aquatic Biodiversity Impact Assessment** compiled by Dietmar de Klerk (SACNASP Reg No. 119173) **will be included** as part of the Basic Assessment Report to be compiled for the proposed development. Upstream Consulting has been appointed to conduct the Water Uses Licence Application. As per the findings of the Risk Assessment Matrix, and concluded by the specialist, the project would undergo a General Authorisation process (based on the anticipated low impact of the proposed development on the watercourses). Additionally, the Breede-Olifants Catchment Management Agency (BOCMA) will also be included as a Stakeholder during PPP. The hydrological aspects of the proposed development site will be considered as part of the Aquatic Biodiversity Assessment. Therefore, a **designated Hydrological Assessment will not be undertaken** for the proposed development.

3.4. Archaeological and Cultural Heritage

Screening Tool: The report indicates the site's Archaeological and Cultural Heritage significance is of **Very High** Sensitivity. The screening tool does suggest an Archaeological and Cultural Heritage Impact Assessment be completed.

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity
Very High	Within 2km of a Grade II Heritage site

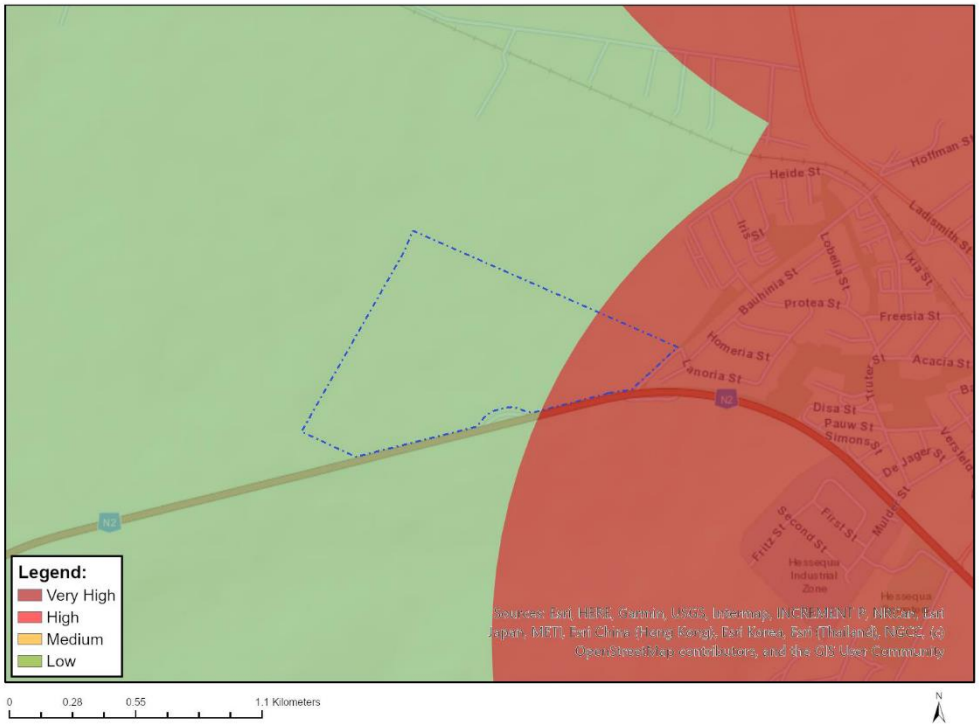

Figure 10: Relative Archaeological and Cultural Heritage Sensitivity Map

Observation on Site - by the EAP: Following the submission of the NID

Based on the nature of the project and in accordance with the National Heritage Resource Act 25 of 1999, a specialist has been appointed to assess whether any heritage significances have been identified. During the site visit undertaken, it was noted that the proposed development area has seen significant historical transformation (due to the existing agricultural practices within the proposed development area). Therefore, it is anticipated that the development will bear very little archaeological significance.

Observations on Site by the Specialist: The Notice of intent to Develop (NID) was submitted to Heritage Western Cape (HWC) by Kapp Consulting on 28 November 2022. A response to the NID was received from HWC on 8 December 2022. In their response, it was indicated that a Heritage Impact Assessment (HIA) would be required for the proposed development (including a Visual Impact Assessment (VIA) to be undertaken). Jayson Orton (ASHA Consulting) was appointed to do site sensitivity verification.

It was confirmed that archaeological material in the form of Early Stone Age artefacts is present, but this aspect could not be well-evaluated due to the density of vegetation (wheat) on the site at the time of the assessment. Even with fairly dense scatters present, the significance of such material would be low, and mitigation be easily implemented.

The landscape is identified as a cultural landscape of at least medium significance and the N2 which passes through this landscape and is adjacent to the site is similarly significant. Garcia Pass along the R323 to the north is dated as Grade II, but the historically significant section is located far to the north. Riversdale town has been severely changed by insensitive development over the years and the townscape is of no particular cultural significance.

Conclusion and recommendation of the EAP: The **HIA** compiled by Jayson Orton (ASHA Consulting, 2023) (Association of Southern African Professional Archaeologists: 233) **will be included** as part of the Basic Assessment Report for the proposed development. In

accordance with General Protocol for Specialist Assessments (GN 320 of March 2020), the assessment was done in accordance with Appendix 6 of the EIA Regulations of 2014, as amended (GNR 326 of 2017).

3.5. Civil Aviation

The **Screening Tool** indicates that the civil aviation impact is of **Very High** Sensitivity. This is due to the proximity of the proposed project to the Riversdale Airport. However, the proposed project is not expected to impact on the airport and is not expected to obstruct the flight path.

Sensitivity Features

Sensitivity	Feature(s)
High	Within 8 km of other civil aviation aerodrome

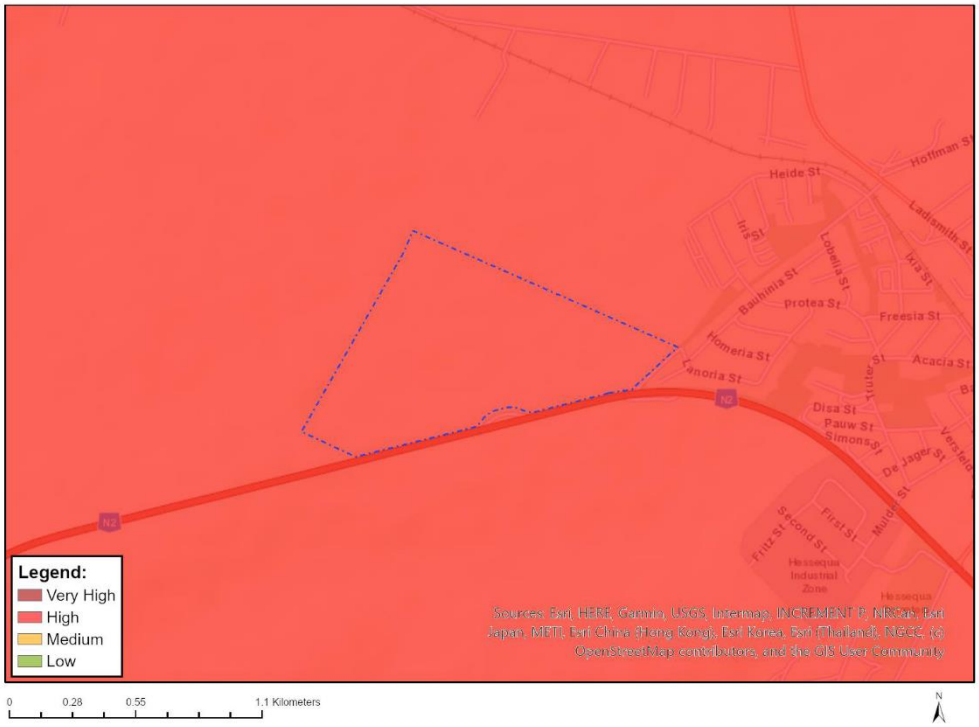

Figure 11: Civil Aviation Sensitivity Map

Observation on Site – by the EAP:

The Riversdale Airport (FARD) is located approximately 2.7 km south-east of the proposed development site. The proposed development will not be located in the flight path of the airport. No major airline services are available at the airport, all airport infrastructure is dilapidated, and the airport grounds are no longer used for its intended purpose. The FARD airport is also no longer listed as an active facility in terms of the Aeronautical Information Publication (AIP) published by the Civil Aviatioon Authority (last uploaded January 2025). Therefore, the proposed development will have no impact on the operations of the airport.

Conclusion: A dedicated civil aviation assessment will **not** be conducted as the proposed development is not expected to impact on the flight path of the airport. The South African Civil Aviation Authority (CAA) will be included as I&APs during the PPP.

3.6. Defence

The **Screening Tool** suggest that the defence theme is of **Low** Sensitivity.

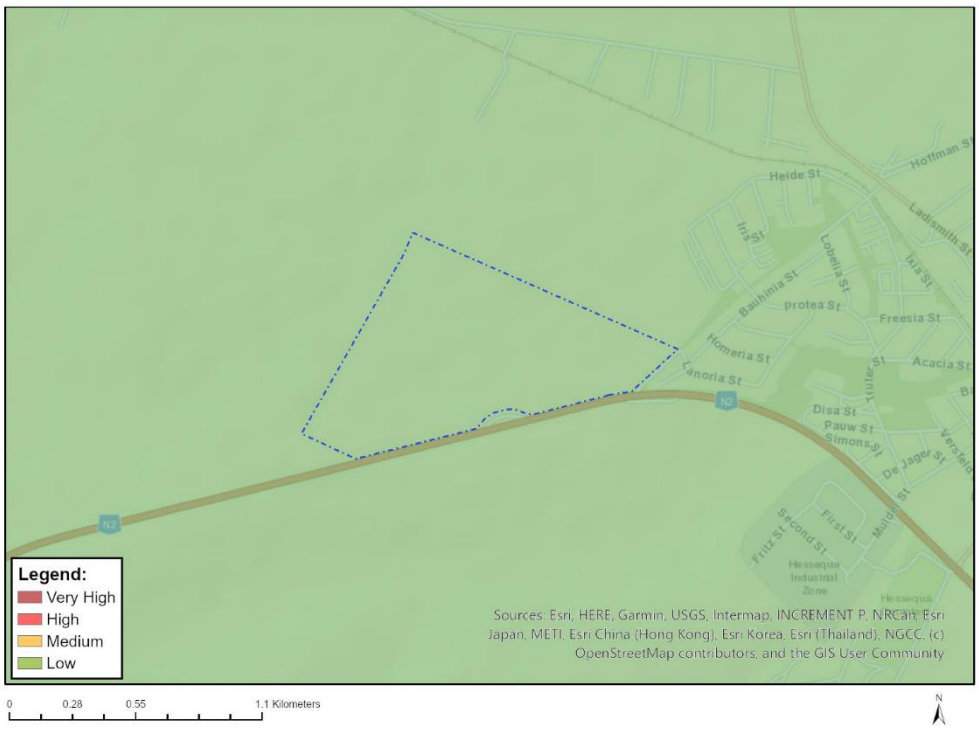

Figure 12: Defence Theme Sensitivity Map

Conclusion: No impacts on existing Defence areas were noted on the site, as such, no further action will be undertaken. A dedicated Defence Assessment will not be undertaken for the proposed development.

3.7. Landscape & Visual Impact

The proposed development will be located directly adjacent to the N2-Highway and will be visible from the national road when travelling to and from Cape Town along the highway. Establishments noted by the EAP as potentially affected by the proposed development was "Die Skip" Restaurant, Ou Meul Riversdale and the residents along the western boundary of the existing built-up area of Riversdale town.

Following the receipt of the response to the submitted NID from HWC, a Visual Impact Assessment specialist was appointed to undertake site sensitivity verification and undertake the impact assessment for the project. Site sensitivity verification was done by Cara Holm (SACLAP Reg: 20194) from FC Holm Architects and Landscape Architects. Five (5) viewpoints were identified for the proposed development site:

- Viewpoint 1 is situated at the northwestern corner of the Langezicht residential complex located along Erica Street – Site exposure is expected to be high at this point.
- Viewpoint 2 is situated at the Oakdale High School's entrance gate on the R323 – Site exposure is expected to be moderate at this point.
- Viewpoint 3 is situated on the corner of the Ou Meul Restaurant located along the N2 highway – Site exposure is expected to be moderate to high at this point.
- Viewpoint 4 is situated on the N2 highway leading to George, looking in an easterly direction towards the site – Site exposure is expected to be moderate at this point.

- Viewpoint 5 is situated in the industrial area along Fritz Grub Crescent – Site exposure is expected to be moderate to high at this point.

Conclusion: Based on the site verification findings of the Visual Assessment Specialist, and the requirement of HWC, a **Visual Impact Assessment** was undertaken by Cara Holm (SACLAP Reg: 20194) from FC Holm Architects and Landscape Architects) and **will be included** as part of the Basic Assessment Report. All parties identified by the specialist will be included as potential Interested and/or Affected during the PPP to be undertaken.

3.8. Socio-Economic Assessment

It is not expected that this environmental process related to the proposed development will have a detrimental effect on the socio-economic structure of the surrounding environment. The proposed development aligns with the strategic documents (the Integrated Development Plan, the Spatial Development Plans and Environmental Management Framework) and the future planning for the Riversdale Settlement. Therefore, **a Socio-Economic Assessment will not be undertaken** as part of the impact assessment phase. The socio-economic status (based on the local, regional and provincial municipal documents) will be described in the impact assessment report. Furthermore, the need and desirability of the proposed development will also be elaborated upon in the Basic Assessment Report.

3.9. Palaeontology

The **Screening Tool** indicated that the sensitivity of the site is **Very High** from a palaeontological perspective and further indicated that a Palaeontology Impact Assessment would be required.

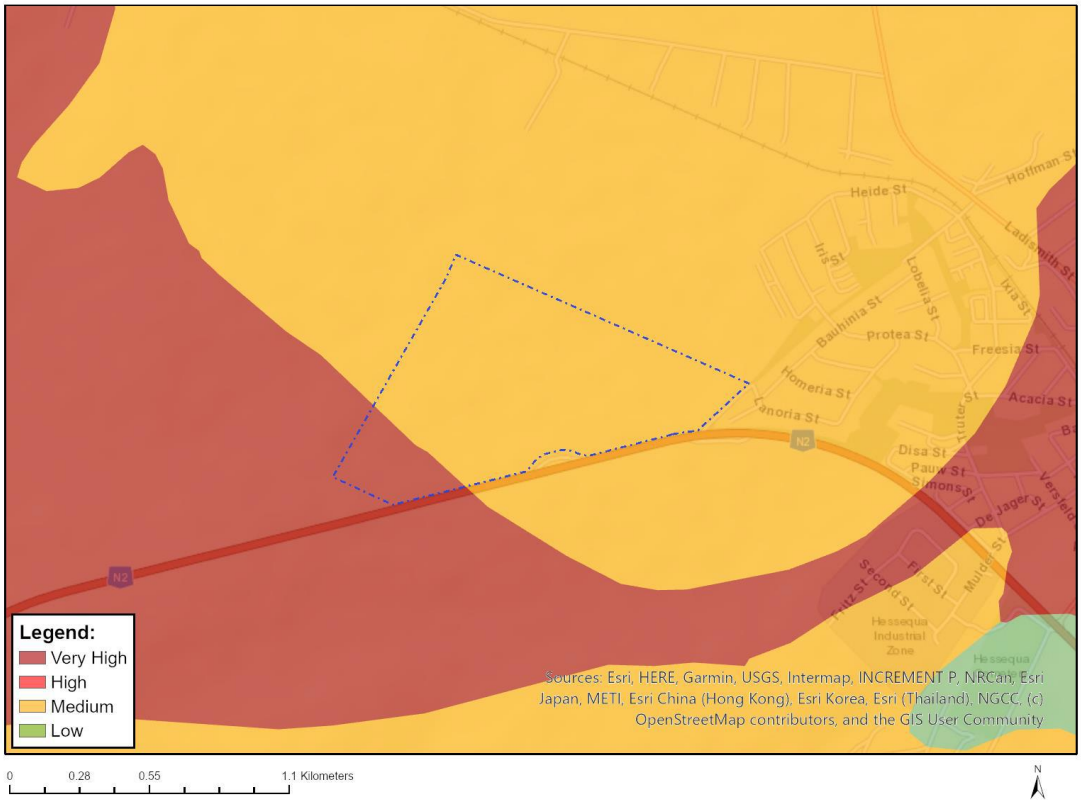

Figure 13: PalaeoSensitivity Map as per the screening tool. Please note, this map is informed by the SAHRIS PalaeoSensitivity map compiled for the Country.

Findings of the Specialist: According to the site sensitivity verification undertaken by Jayson Orton,

although the SAHRIS Palaeosensitivity Map shows the site to be of very high and unknown sensitivity, HWC did not request a specialist palaeontological assessment. This is likely because it is well-known that the bedrocks of the Agulhas plain are highly deformed and deeply weathered.

According to John Almond (pers.comm. by Jayson Orton 2024) the 1:250 000 geological map indicated that within the study area "High Level Gravels" - i.e. ancient alluvial gravels - overlie Early Cretaceous fluvial / lacustrine sediments of the Kirkwood Formation (Uitenhage Group). These Late Caenozoic gravels are most noticeable in piles of cobbles and boulders accumulated along the edges of the ploughed lands. There is a small possibility that downwasted dinosaur bones or petrified wood blocks derived from the Cretaceous bedrocks could be present amongst the gravels. The Kirkwood Formation itself is likely to be weathered in the near-surface impact zone but the potential for well-preserved, in situ fossil wood or dinosaurian remains here cannot be excluded. Given the very low bedrock exposure levels within the study area, these potential subsurface fossil occurrences are best handled through a Chance Fossil Finds protocol.

Conclusion: The **HIA compiled** by Jayson Orton (ASHA Consulting, 2023) **will be included** as part of the Basic Assessment Report for the proposed development. In accordance with General Protocol for Specialist Assessments (GN 320 of March 2020), the assessment was done in accordance with Appendix 6 of the EIA Regulations of 2014, as amended (GNR 326 of 2017). The Chance Fossil Finds protocol will be included as an appendix to both the HIA and the Environmental Management Programme to be compiled for the proposed development. HWC will be included as Stakeholders as part of the PPP to be conducted for the project.

3.10. Plant Species

The **Screening Tool** indicated that the plant species theme is of **Medium** Sensitivity. The tool suggests that a Plant Species Assessment should be conducted.

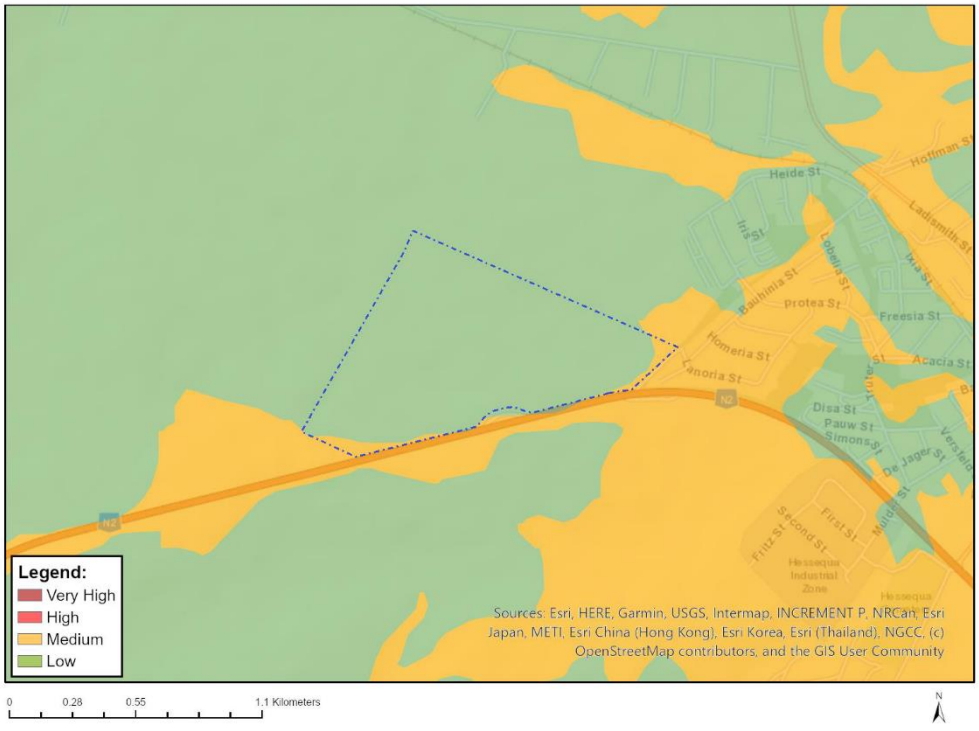

Figure 14: Plant Species Theme Map

Sensitivity	Feature(s)
Low	Low Sensitivity
Medium	*Aspalathus campestris*
Medium	*Aspalathus millefolia*
Medium	*Aspalathus steudeliana*
Medium	*Aspalathus zeyheri*
Medium	*Otholobium pungens*
Medium	*Lotononis viborgioides*
Medium	*Leucadendron coriaceum*
Medium	*Hesperantha muirii*
Medium	*Freesia fergusoniae*
Medium	Sensitive species 157
Medium	*Hermannia lavandulifolia*
Medium	Sensitive species 1142
Medium	Sensitive species 339
Medium	*Anisodontea pseudocapensis*
Medium	*Duvalia elegans*
Medium	Sensitive species 1024
Medium	*Gnidia ericoides*
Medium	*Chrysocoma flava*
Medium	*Stoebe rugulosa*
Medium	*Relhania garnotii*
Medium	*Acmadenia macropetala*
Medium	*Muraltia cliffortiifolia*
Medium	*Polygala pubiflora*
Medium	Sensitive species 692
Medium	Sensitive species 980
Medium	*Ruellia pilosa*
Medium	*Phylica elimensis*
Medium	Sensitive species 822
Medium	*Drosanthemum lavisii*
Medium	*Drosanthemum micans*
Medium	*Drosanthemum striatum*
Medium	*Romulea jugicola*
Medium	Sensitive species 521
Medium	Sensitive species 142
Medium	*Elegia squamosa*
Medium	*Diosma passerinoides*
Medium	*Agathosma microcarpa*

EAP Observation on site: During the site visit undertaken by the EAP, it was noted that very limited natural vegetation remained within the proposed development site as a majority of the site had been transformed by agricultural practices. Two small stands of natural vegetation remained. Both stands showed influences of anthropogenic activity with the vegetation present containing planted aloes, scattered occurrences of *Eucalyptus* spp in the landscape. Various grass species were also noted.

Figure 15: The area indicated as CBA and identified as the remaining portion of the EN ecosystem type on site. The picture on the top right indicates the boulder mounds next to the fence located adjacent to the N2 – Highway. The photo on the right indicates the extent of the natural vegetation, also indicating the extent of the anthropogenic influences on this vegetation (including the planning of a cluster of aloes).

The iNaturalist findings of the site (though concentrated along the N2-Highway), indicated that overall, 126 species (including animal and plant species) were observed in the viewing extent. Of these species, 96 species were plant species, *Polygala pubiflora* was the only sensitive species identified within proximity to the proposed development area. This species was however not identified within the proposed development site.

Figure 16. iNaturalist contributions to the study area and surrounds,

Specialist Observation on Site: Nick Helme was appointed to undertake the Botanical (both Terrestrial Plant and Terrestrial Biodiversity) site sensitivity verification for the proposed development site. Regarding the Plant Species sensitivity, it was indicated that no plant Species of Conservation Concern (SCC) are likely to be present anywhere within the study area, given its long history of agricultural disturbance.

Conclusion: A **Consolidated Compliance Statement (for plant species and terrestrial biodiversity features)** compiled by Nick Helme Botanical Surveys (SACNASP #400045/08) in accordance with the requirements of the October 2020 Protocols **will be included** as part of the Basic Assessment Report and will be included during the impact assessment phase of the development. Furthermore, CapeNature will be included as a Stakeholder during the PPP.

3.11. Terrestrial Biodiversity

The **Screening Tool** suggest that the Terrestrial Biodiversity theme is of a **Very High** sensitivity and that a Terrestrial Biodiversity Impact Assessment should be conducted (Figure 17).

Sensitivity Features

Sensitivity	Feature(s)
Very High	ESA 2: Restore from other land use
Very High	CBA 2: Terrestrial
Very High	CBA 1: Terrestrial
Very High	SWSA (SW) _Langeberg
Very High	EN_Eastern Ruens Shale Renosterveld

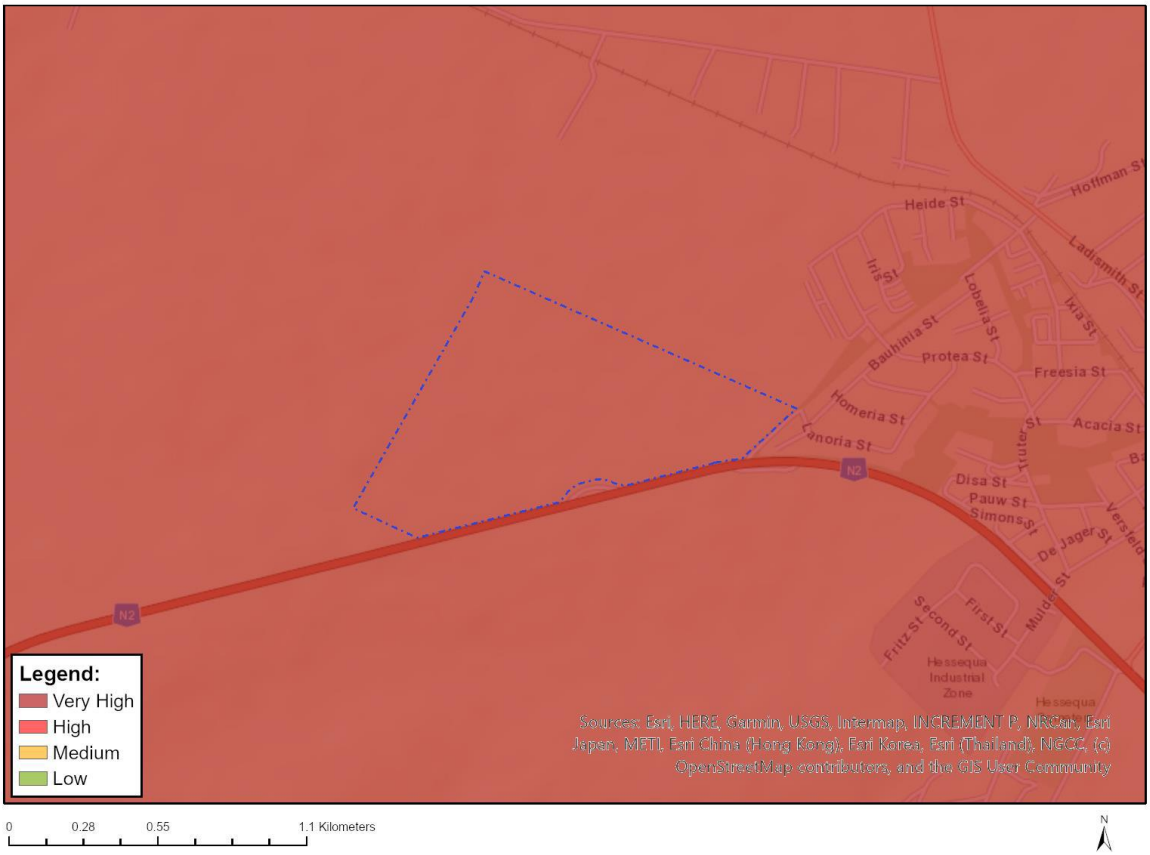

Figure 17: Relative Terrestrial Biodiversity Theme Sensitivity Map

According to the 2023 BSP, the proposed development is located in an area with two small patches of CBA and CBA: Degraded (intertwined) located towards the western and eastern borders of the site, respectively. The bypass area located adjacent to the N2-Highway, has also been identified earmarked as CBA. Please refer to Figure 19 below for a representation of the 2023 BSPs identified in the study area. The proposed development will be located within an area identified as CBA 2 (Degraded): Terrestrial as well as in CBA 1: Terrestrial area. According to the 2023 BSP (adopted in December 2024) there are no ESA 2 areas within the proposed development property and, inherently, the proposed development site. The ESA 2 identified was done so through the 2017 BSP and the Screening Tool Database has yet to be updated accordingly.

Figure 18: The resting spot off the N2-highway as seen from the proposed development site.

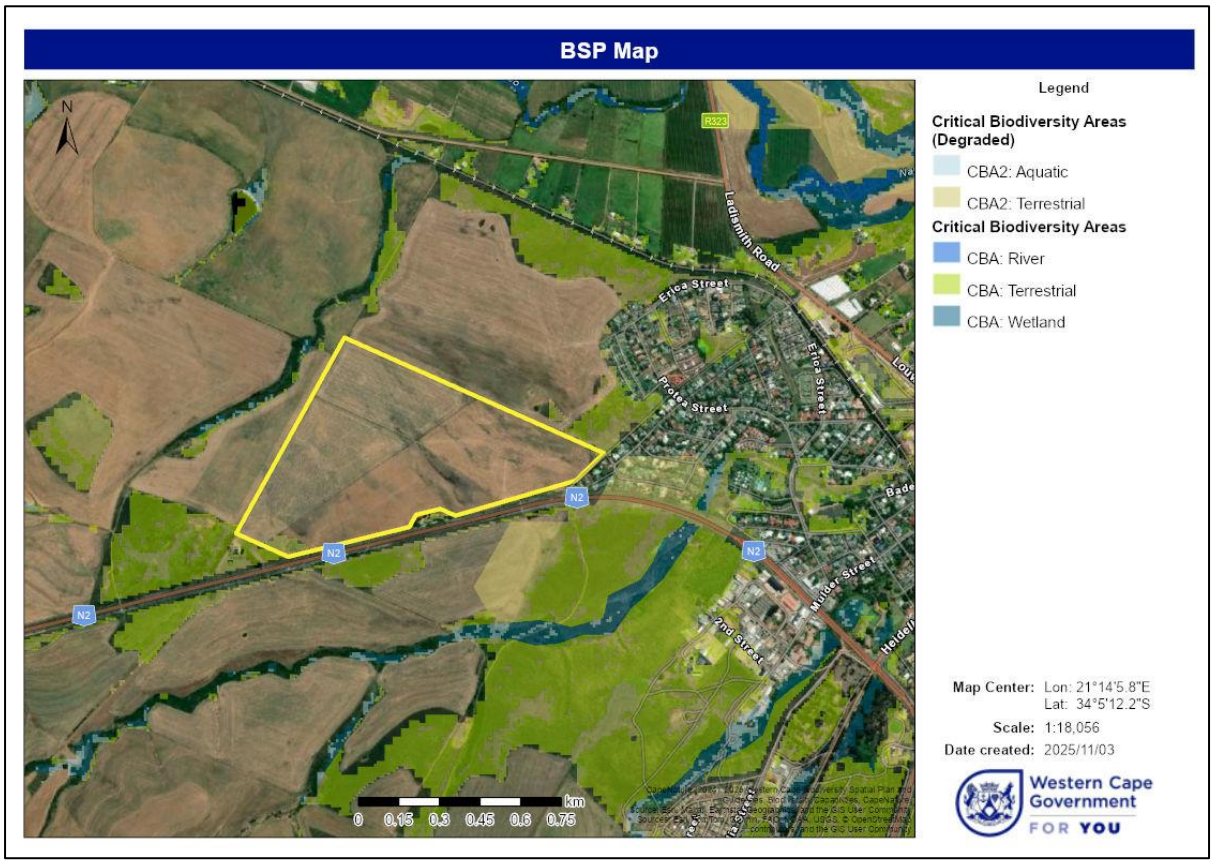

Figure 19: Biodiversity Spatial Plan related to the proposed development.

Lastly, according to Figure 20, the proposed site is partially located within the remaining extent of an Endangered Ecosystem (Eastern Ruens Shale Renosterveld) according to the SANBI Red

List of ecosystems. This area correlates with the CBA area associated located along the western boundary of the proposed development site.

According to the Screening Tool, there is an ESA2 located within the site boundaries as well. As discussed in in Section 3.3 above, the ESA is associated with the 2017 BSP delineations and is not reflected in the 2023 BSP as adopted. The area is demarcated as a wetland in the NWM5 (2018) and has therefore been discussed in the beforementioned section.

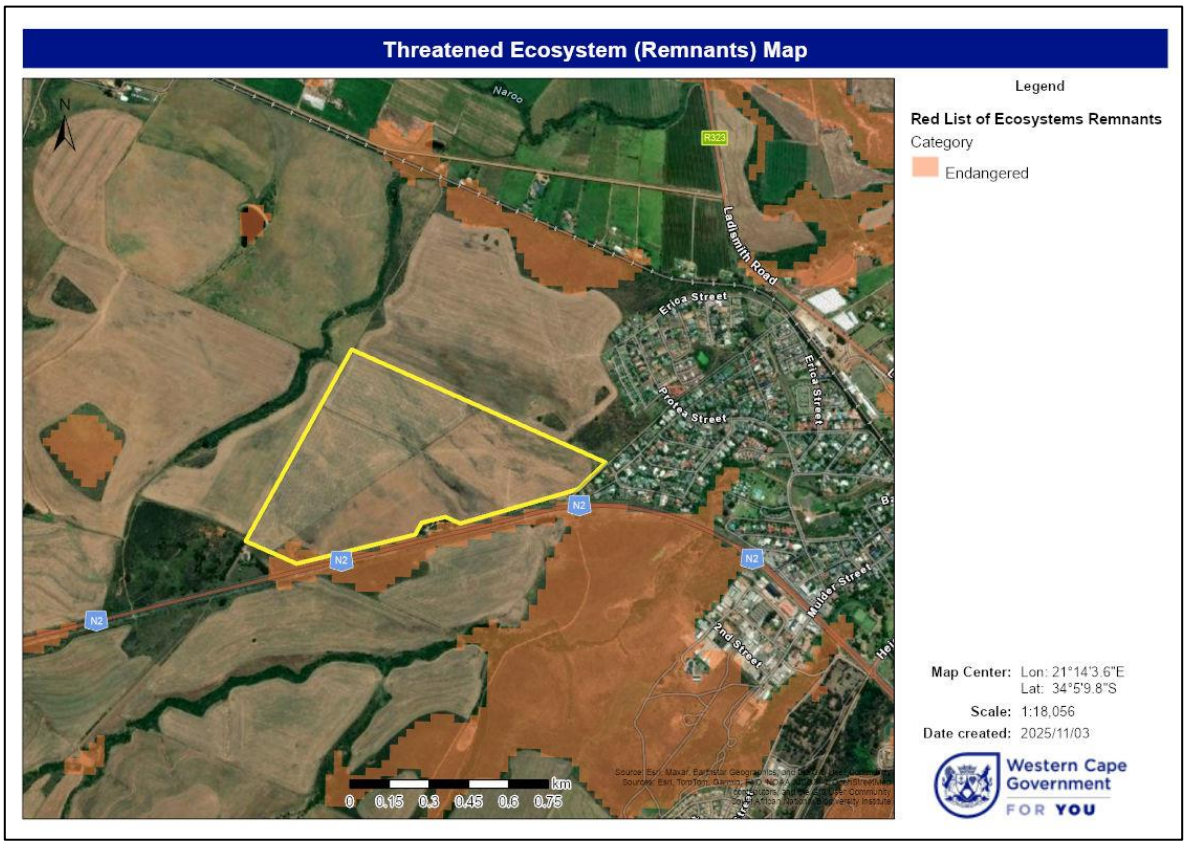

Figure 20: SA Conservation Areas & Red List Ecosystems related to the proposed development.

Specialist findings: Based on the findings there is essentially no natural vegetation remaining on site, as >97% of the site is regularly cultivated. The two small patches of CBA2 may support some low diversity, partly natural vegetation, one on the eastern corner and on the western corner, but both have clearly been moderately to heavily disturbed. The vegetation in the study area is deemed to be of Very Low sensitivity, with the small patches of partly natural remnants (the terrestrial CBA2 areas – as per both the 2017 and 2023 BSP) being of Low sensitivity at a regional scale.

Conclusion: A **Consolidated Compliance Statement (for plant species and terrestrial biodiversity features)** compiled by Nick Helme Botanical Surveys (SACNASP #400045/08) in accordance with the requirements of the October 2020 Protocols **will be included** as part of the Basic Assessment Report and will be included during the impact assessment phase of the development. Furthermore, CapeNature will be included as a Stakeholder during the PPP.

4. SUMMARY OF APPLICABLE SPECIALIST STUDIES

The inputs from various different specialists have been received for the proposed development.

Specialist assessment	To be compiled as part of the Impact Assessment Reporting	Assessment Protocol
Agricultural Impact Assessment	Yes	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Agriculture_Assessment_Protocols.pdf
Landscape/Visual Impact Assessment	Yes	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
Archaeological and Cultural Heritage Impact Assessment	Yes, Palaeontological considerations taken into account in the HIA	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
Palaeontology Impact Assessment		https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
Terrestrial Biodiversity Impact Assessment	Yes	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Terrestrial_Biodiversity_Assessment_Protocols.pdf
Aquatic Biodiversity Impact Assessment	Yes (Hydrology Assessment to be included in Aquatic Biodiversity Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Aquatic_Biodiversity_Assessment_Protocols.pdf
Hydrology Assessment		https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
Socio-Economic Assessment	No	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
Plant Species Assessment	Yes (as part of Terrestrial Biodiversity Impact Assessment)	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Plant_Species_Assessment_Protocols.pdf
Animal Species Assessment		https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Animal_Species_Assessment_Protocols.pdf

Technical input will be supplied by the engineering team as required.

5. CONCLUSION

SES has been appointed by Belladonna (Pty) Ltd to oversee the environmental process associated with the proposed development. Originally, Kapp Environmental Consulting was appointed to oversee the process, but the project has subsequently been reallocated to SES.

SES hereby confirms that all assessments have been undertaken in line with the protocols as promulgated for the respective themes. The requirements of the protocols have been incorporated into the Terms of References of the various specialists. All specialists are registered with the relevant professional bodies. Where changes to the reports produced for Kapp Environmental Consulting are requested/required, these changes will be requested to be made as addendums to the original reporting done as part of the Basic Assessment Process.

From the findings of this report, SES proposes that the below recommended specialist inputs, will be sufficient to address the site sensitivities:

- Heritage Impact Assessment (Including Palaeontological considerations)
- Agricultural Compliance Statement;
- Aquatic Biodiversity Assessment (including the Hydrology Considerations);
- Terrestrial Biodiversity and Plant Compliance Statement;
- Animal Species Compliance Statement (as part of the Terrestrial Biodiversity Assessment); and
- Visual Impact Assessment;

Other assessments to be included as part of the Basic Assessment Process:

- A Geotechnical Assessment;
- Traffic Impact Assessment.