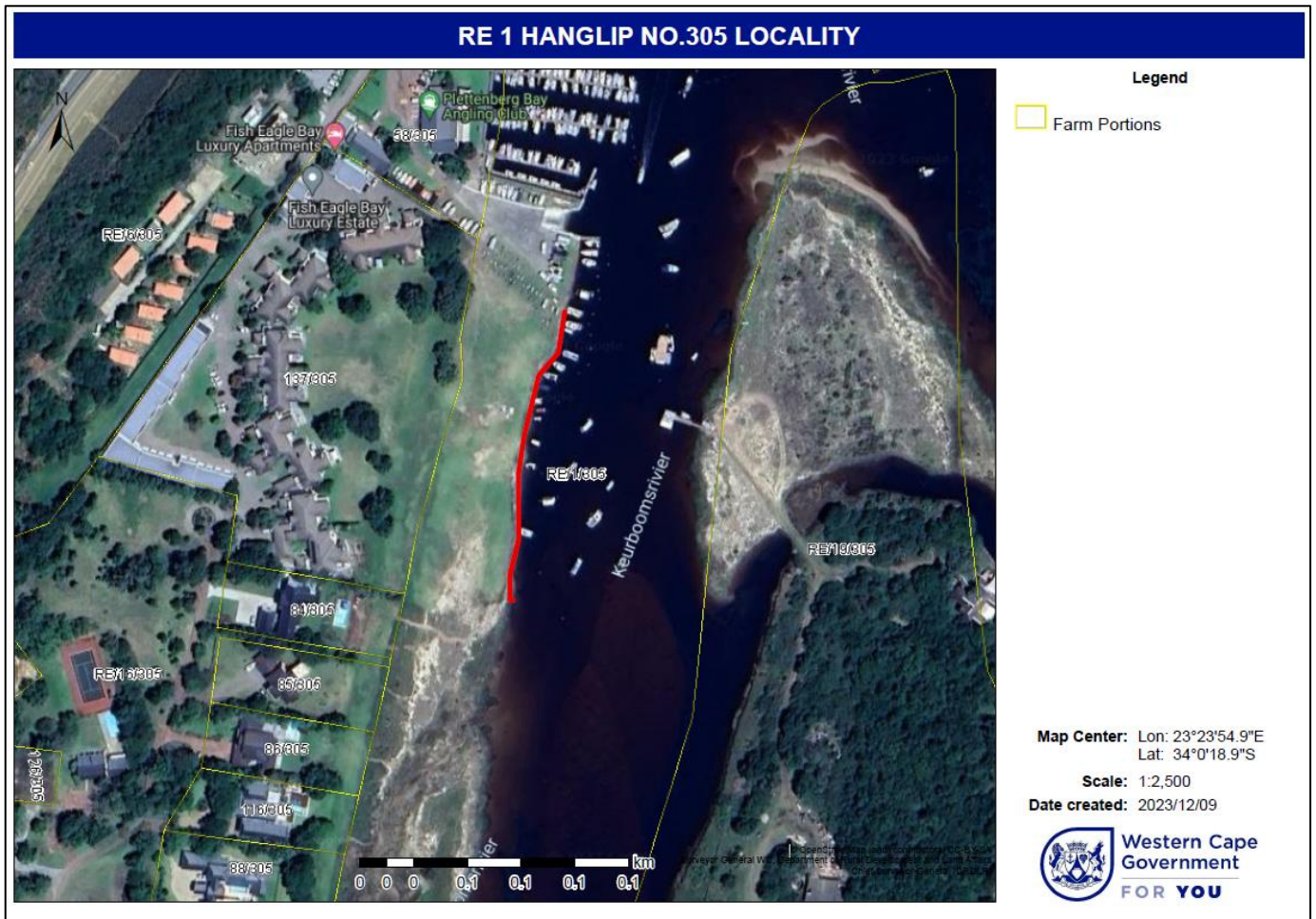




## EAP SITE SENSITIVITY VERIFICATION REPORT

### RE 1 of Hanglip no.305

### Keurbooms Riverbank Stabilisation



Samantha Teeluckdhari for Eco Route Environmental Consultancy

BSS Geography and Environmental Management

EAPASA reg no.: 2023/6443

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# Eco Route

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## 1. Introduction and Terms of Reference

As per Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended whereby a Screening Report is required to accompany any application for Environmental Authorisation, the DFFE has developed The National Web based Environmental Screening Tool which generates the compulsory Screening Report.

The Screening Report generates the environmental sensitivity of a property and identifies specialist assessments required for an EIA. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Therefore, a Site Sensitivity Verification (this report) is required to confirm the identified specialist assessments prior to the submission of an EIA application.

## 2. The Proposed Development at The Property

Eco Route Environmental Consultancy were appointed by the applicant, Plettenberg Bay Angling Club as the independent Environmental Assessment Practitioner to conduct a Basic Assessment application process for the proposed embankment stabilisation activities along a portion of RE 1 of Hanglip no.305.

The stabilisation activities will occur along a section of the embankment of the Keurbooms River (approximately 50 metres), south of the Plettenberg Bay Angling Club, Western Cape – GPS Coordinates: 34° 0'17.20"S 23°23'55.62"E.



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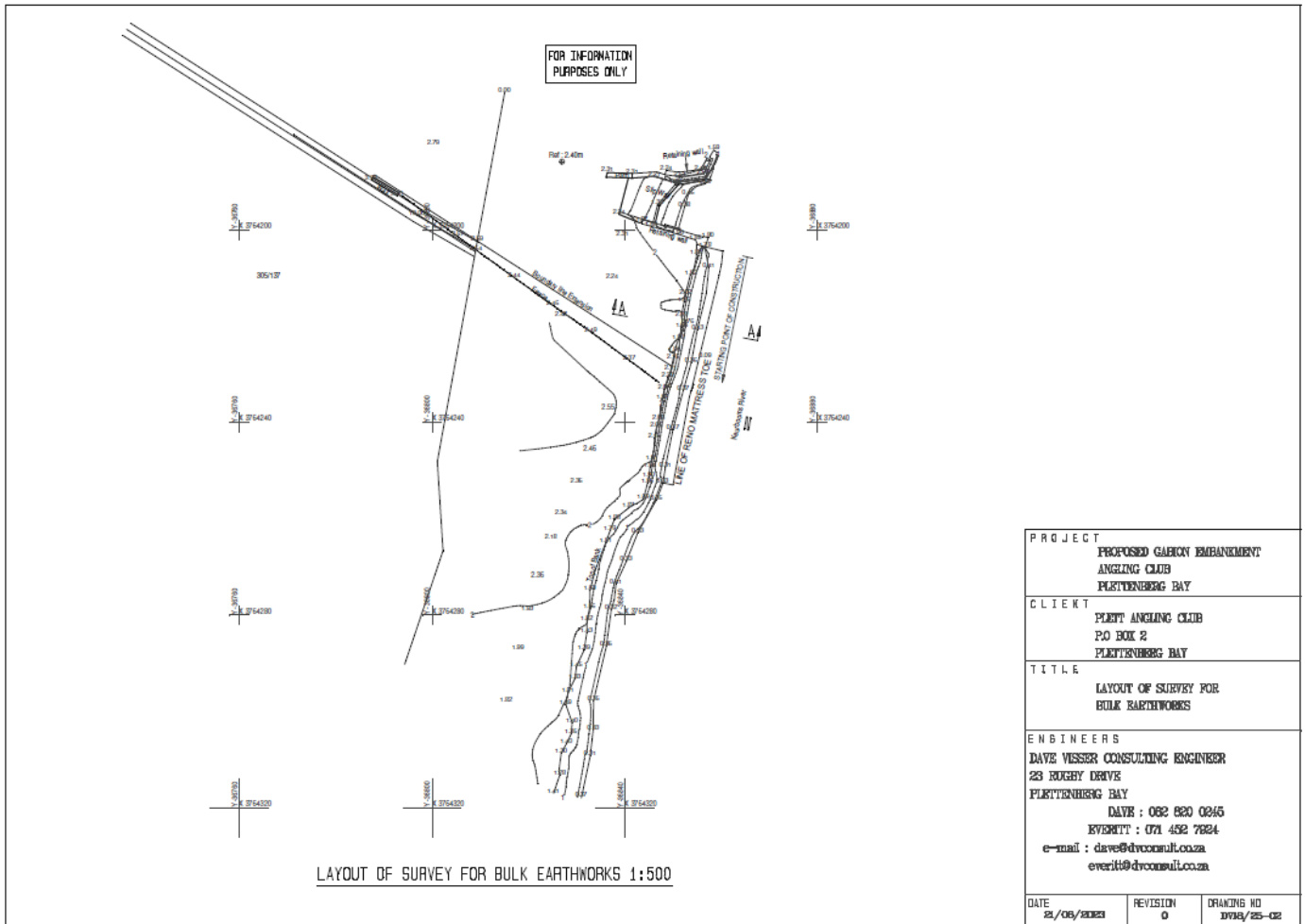
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**Figure 1: Land survey showing the proposed embankment stabilisation.**



**Figure 2: Proposed area of construction**

### **3. Wind & Solar Developments with An Approved Environmental Authorisation or Applications Under Consideration Within 30 Km of The Proposed Area.**

No nearby wind or solar developments found.

### **4. Environmental Management Frameworks Relevant to The Application:**

No intersections with EMF areas found.

### **5. Proposed Development Area Environmental Sensitivity:**

The following summary of the development footprint environmental sensitivities are identified by the Screening Tool Report. Only the highest environmental sensitivity is indicated. The environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

**Table 1: Identified Environmental Sensitivities**

Theme	Very High Sensitivity	High Sensitivity	Medium Sensitivity	Low Sensitivity
Agriculture Theme			x	
Animal Theme		x		
Aquatic Biodiversity Theme	x			
Archaeological and Cultural Heritage Theme				x
Civil Aviation Theme		x		
Defence Theme				x
Paleontology Theme			x	
Plant Species Theme			x	
Terrestrial Biodiversity Theme	x			

**Table 2: Specialists identified by the Screening Tool Report to inform the Basic Assessment Report**

Specialist	Assessment Protocol
Landscape/Visual Impact	General Protocol
Archaeological and Cultural Heritage Impact Assessment	General Protocol
Palaeontology Impact Assessment	General Protocol
Terrestrial Biodiversity Impact Assessment	Terrestrial Biodiversity Protocol
Aquatic Biodiversity Impact Assessment	Aquatic Biodiversity Protocol
Hydrology Assessment	General Protocol
Socio-Economic Assessment	General Protocol
Plant Species Assessment	Plant Species Protocol
Animal Species Assessment	Animal Species Protocol

The following studies/reports/information has been identified by the EAP for inclusion in the Basic Assessment Report:

- Engineering/Architectural plans
- Erosion mitigation measures stipulated within the EMPr
- Archaeological & palaeontological monitoring measures stipulated in the EMPr

## 6. Results of the verification of the environmental sensitivity and specialist assessments identified of the proposed area:

A site visit was conducted on 7 June 2023. Motivation and photographic or satellite imagery evidence has been included to confirm or dispute the findings of the DFFE Screening Tool Report.

### 6.1 Relative Agricultural Theme Sensitivity

The screening report indicates that the receiving environment has a **Medium** agricultural sensitivity.

The land is not viable for agricultural production and the proposed development does not constitute a loss of agricultural production potential.



During the undertaking of the ground truthing, it was noted that the site was highly transformed and eroded over the years and has never been utilized for agricultural purposes. The agricultural impact of the proposed development is assessed as being of no significance and the site should receive a new sensitivity rating of Low. The EAP motivates that an agricultural specialist is not required for the proposed EIA as it is clear that no agricultural activity may take place in this area. The Department of Agriculture will be included in the I&AP Register and will be provided an opportunity to comment within the statutory period.



**Figure 3: Current condition of the Keurbooms River embankment. The location for the proposed activity is not suitable for agricultural activities.**

### 6.2 Relative Animal Species Theme Sensitivity

The screening report indicates that the receiving environment has a **High** rating for animal species sensitivity and indicated the following features for the theme.

**Table 3: Animal Sensitivity Features:**

Sensitivity	Feature(s)
High	Aves-Circus ranivorus
High	Aves-Hydroprogne caspia
High	Aves-Neotis denhami
High	Aves-Polemaetus bellicosus
Medium	Mammalia-Chlorotalpa duthieae
Medium	Sensitive species 8
Medium	Invertebrate-Sarophorus punctatus

The listed species were not observed during the site visit; however, as per the Protocol for Terrestrial Animal Species, a specialist has been appointed to conduct a site visit and confirm the site sensitivity in the form of a report which meets the requirements of the gazetted protocols.

### 6.3 Relative Aquatic Biodiversity Theme Sensitivity

The screening report indicates that the receiving environment has a **Very High** aquatic biodiversity sensitivity. This rating is due to the proposed stabilisation of the Keurbooms River embankment being located within a CBA: Estuary according to the WCBSA.

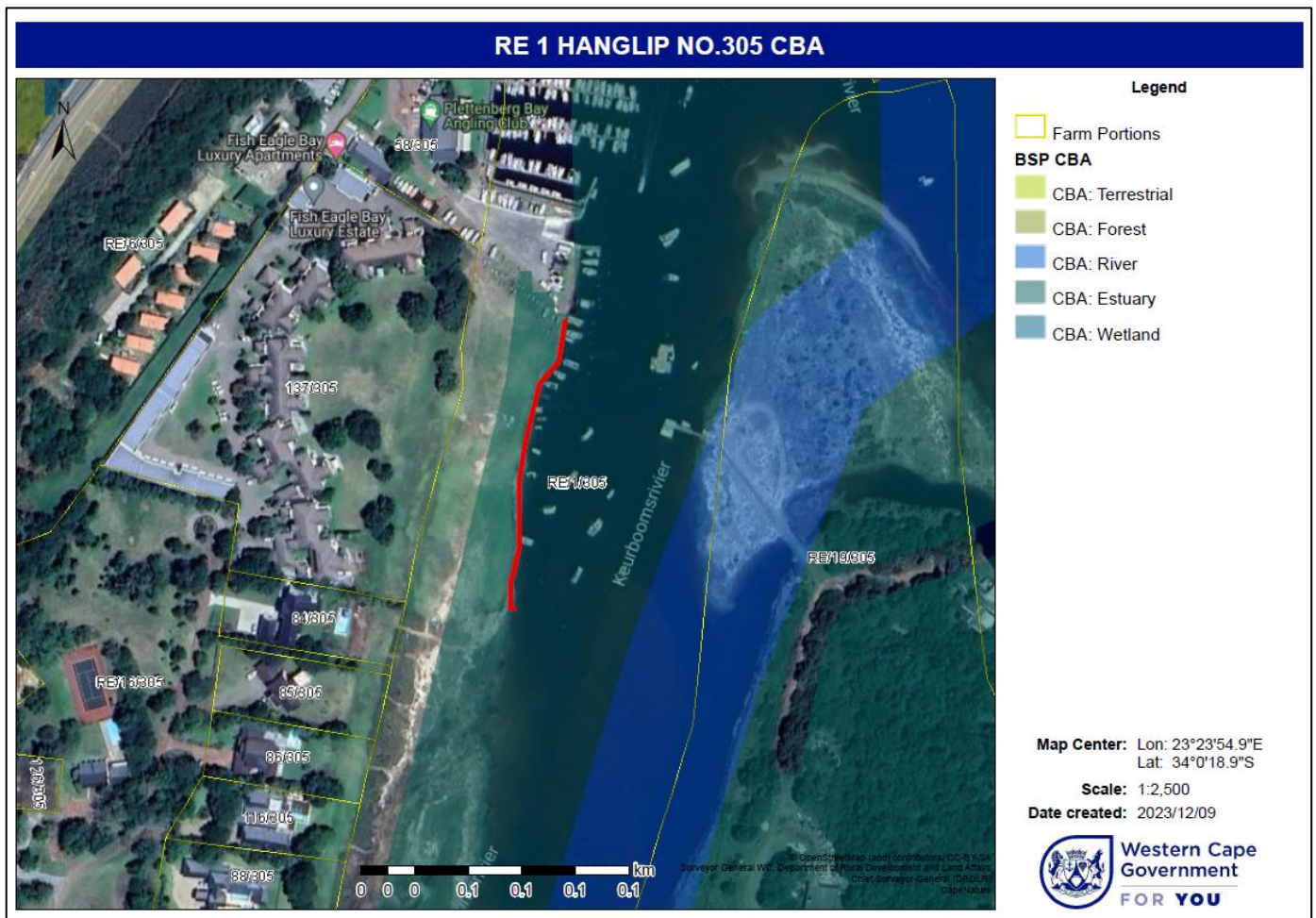


Figure 4: GIS map of the Western Cape BSP obtained from Cape Farm Mapper

As per the Protocol for Aquatic Biodiversity, a SACNASP registered specialist has been appointed to conduct a site visit and confirm the site sensitivity in the form of a report which meets the requirements of the gazetted protocols. An assessment report was compiled and will be included in the BAR.



## 6.4 Relative Archaeological & Cultural Heritage Theme Sensitivity

The screening report indicates that the receiving environment has a **Low** archaeological & cultural heritage sensitivity.

The proposed activity does not trigger an activity in terms on Section 38 of the National Heritage Resources Act, 1999, (Act No.25 of 1999) nor are there any signs of culturally or historically significant elements, as defined in section 2 of the National Heritage Resources Act, 1999, (Act No.25 of 1999). In addition, as the land has been previously altered and no archaeological or cultural heritage artefacts were noted during a site visit, it is motivated that this theme will not require specialist assessment in the EIA. A Notice of Intent to Develop form was submitted to Heritage Western Cape and these findings were agreed upon. A copy of HWC's comments will be included in the EIA application and monitoring measures and action protocols will be included in the EMPr should there be any findings during the construction phase.

## 6.5 Civil Aviation Theme Sensitivity

The screening reports indicate that the receiving environment has a **High** sensitivity for this theme as the proposed development property is within 8km of a civil aviation aerodrome – the Plettenberg Bay Airport.

The proposed activity will not have any impact on the airfield or overhead planes. It is motivated that this theme will not require specialist assessment or comment from the Plettenberg Bay Airport in the EIA.

## 6.6 Defence Theme Sensitivity

The screening reports indicate that the receiving environment has a **Low** sensitivity for this theme. As no specific protocol exists for this theme, the General Requirements Protocol is assigned to this sensitivity.

The EAP confirms that the defence sensitivity of the proposed development property is negligible, and no further assessments will be required in the EIA process.

## 6.7 Palaeontology Theme Sensitivity

The screening report indicates that the receiving environment has a **Medium** paleontological sensitivity.

A Notice of Intent to Develop form was submitted to Heritage Western Cape and their findings concluded that the proposed activity would not impact heritage resources and no further action is required under Section 38 of the National Heritage Resources Act (Act 25 of 1999). A copy of HWC's comments will be included in the EIA application and monitoring measures and action protocols will be included in the EMPr should there be any findings during the construction phase.

## 6.8 Relative Plant Species Theme Sensitivity

The screening report indicates that the receiving environment has a **Medium** relative plant species sensitivity and indicated the following features for the theme in Table 3 below.



**Table 4: Plant Species Sensitivity Features:**

Sensitivity	Feature(s)
Medium	Faurea macnaughtonii
Medium	Ocotea bullata
Medium	Ruschia duthiae
Medium	Amauropelta knysnaensis
Medium	Leucospermum glabrum
Medium	Selago burchellii
Medium	Cotula myriophylloides
Medium	Acmadenia alternifolia
Medium	Sensitive species 763
Medium	Zostera capensis

The site is extensively disturbed, with high evidence of erosion of the embankment over time with extreme degradation of vegetation. As per the Protocol for Terrestrial Plant Species, a specialist has been appointed to conduct a site visit and confirm the site sensitivity in the form of a report which meets the requirements of the gazetted protocols.



**Figures 5 & 6: Erosion of embankment is evident with a dominance of grass cover.**

## 6.9 Relative Terrestrial Biodiversity Theme Sensitivity

The screening report indicates that the receiving environment has a **Very High** terrestrial biodiversity sensitivity; and indicated the following features for the theme:

**Table 5: identified Terrestrial Biodiversity features**



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Sensitivity	Feature(s)
Very High	FEPA Subcatchment
Very High	National Protected Area Expansion Strategy (NPAES)
Very High	SANParks (Buffer)_Garden Route National Park
Very High	SWSA (SW)_Outeniqua
Very High	EN Garden Route Shale Fynbos

The site is severely eroded and is dominated by grass; however, as per the Protocol for Terrestrial Biodiversity, a specialist has been appointed to conduct a site visit and confirm the site sensitivity in the form of a report which meets the requirements of the gazetted protocols.

### 6.10 Landscape/Visual Impact Assessment

The Screening Tool Report has identified landscape/visual impact as an assessment. This is a standard assessment identified by the Screening Report.

The EAP would like to motivate that specialist consultation/input would not be required for this theme for the following reasons:

1. The property is developed and is surrounded by a developed area.
2. The proposed minor construction work to stabilise the embankment would not pose any visual impacts to neighbouring properties or alter the sense of place.
3. The embankment is currently severely eroded and in desperate need to be stabilised using engineering methods. In addition, the stabilization of the embankment would protect the properties landwards of the Keurbooms River in the proposed vicinity of works.

### 6.11 Socio-economic Impact Assessment

The proposed activity has no impact on socio-economic aspects and is required to stabilise the Keurbooms River embankment in the vicinity of the Plettenberg Bay Angling Club. Therefore, it is motivated that this assessment be omitted from the EIA.

### 6.12 Hydrology Assessment

A SACNASP registered specialist confirmed that this assessment would not be necessary as the bank stabilisation will not affect the hydrology of the Keurbooms estuary (i.e. flow will not be impeded or abstracted). An Estuarine Assessment has been undertaken and will be included in the BAR.



## 7. Conclusion

The purpose of this SSVR is for the EAP to have conducted a site screening and identified the relevant specialists required according to the proposed activity and taking into consideration the site sensitivities. In addition, the EAP would like to engage with the Department regarding specialist assessments prior to formally beginning the EIA process.

To summarise the above, the following themes/impacts will require specialist consultations:

1. Animal species sensitivity
2. Aquatic biodiversity
3. Plant species sensitivity
4. Terrestrial biodiversity

Additional specialist input required for the EIA:

- Engineering/Architectural plans
- Erosion mitigation measures stipulated within the EMPr
- Archaeological & palaeontological monitoring measures stipulated in the EMPr

Kindly confirm if the Department is of the opinion that additional specialists would be required, naming the specific specialist assessments to be undertaken.

Yours Faithfully

**Samantha Teeluckdhari**

EAPASA Registration: 2023/6443

Contact number: 072 773 5397