

SITE SENSITIVITY VERIFICATION REPORT

THE DEVELOPMENT OF A TENTED CAMP ON FOUNDERS ESTATE 5, FARM 1685/5, PAARL (FE5)

DATE: 1 October 2021

INTRODUCTION AND SCOPE:

The "Protocols for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes ("the Protocols") were published in Government Gazette No. 43110 on 20 March 2020 and Government Gazette No. 43855 on 30 October 2020. The Protocols are allowed for in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA").

The Protocols must be complied with for every new application for Environmental Authorisation 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 by the Screening Tool to determine the need for specialist inputs in relation to the themes included in the Protocols. This document serves as the Site Sensitivity Verification Report for the Development of a Tented Camp on Founders Estate 5 which commenced in 2019 without Environmental Authorisation.

The location of the proposed development is shown in the aerial image included in Figure 1 and the developed site is indicated in Figure 2 . This site sensitivity verification relates to one Screening Tool Report completed for the site when initial site investigations commenced in March 2020.



Figure 1: Locality Map (created using Google Earth Pro)



Figure 2: Aerial View of Site

SENSITIVITY VERIFICATION METHODOLOGY:

The site sensitivity verification statement was compiled by the EAP and is based on:

- Site visit undertaken on 5 May 2020 & 7 September 2021.
- A desktop investigation using biodiversity and land use mapping tools (BGIS, Cape Farm Mapper, City of Cape Town Zoning Viewer, etc.); and
- Baseline information recorded in specialist assessments and reports undertaken by a soil scientist, heritage practitioner, freshwater ecologist, botanical, and two faunal specialists.

SITE SENSITIVITY VERIFICATION:

The table below, supporting photographs and reference to specialist assessments serve to:

- Verify land use and sensitivities identified in the screening report; and
- Confirm / contest the need for the various specialist inputs called for in terms of the screening tool report.

SENSITIVITY AND SPECIALIST INPUT IDENTIFIED IN TERMS OF THE DFFE SCREENING TOOL	VERIFICATION OF SITE-SPECIFIC SENSITIVITY AND MOTIVATION ON THE NEED FOR SPECIALIST INVESTIGATION
<p>Agricultural Theme: High sensitivity</p> <p>Necessitating an agricultural impact assessment (in accordance with the protocol prescribed in GNR 320).</p> <p>Actual Sensitivity: Medium</p>	<p>The STR assigns a 'High' sensitivity for the agricultural theme. Given this rating, a site sensitivity verification was undertaken by soil scientist, Johann Lanz, who verified the entire site as being of 'Medium' sensitivity instead and confirmed the required level of agricultural assessment as an Agricultural Compliance Statement.</p> <p>An Agricultural Compliance Statement (Lanz, 2021) in compliance with the protocols prescribed by GNR 320 has been undertaken (refer to Appendix H (iv) of the EIR).</p>

<p>Animal Species Theme: Medium sensitivity</p> <p>Necessitating an animal species assessment (in accordance with Animal Species Assessment Protocols prescribed in GN 43855)</p> <p>Actual Sensitivity: Low</p>	<p>The STR indicates the site as having 'Medium' sensitivity for the animal species theme given the potential presence of two invertebrate species, namely <i>Kedestes lenis lenis</i> (False Bay Unique Ranger butterfly) and Sensitive species 7 (SSp7) (a butterfly of which the identity is not revealed). As such, a thorough desktop study was commissioned to ascertain whether there is any chance of the species occurring on site and whether a detailed survey of the entire project area for these species would be appropriate to determine specific impacts. Hawkes (2021) confirmed that the probability that either <i>Kedestes lenis lenis</i> or SSp7 will be present on site is negligible and no impact on these species is expected. As such, an Animal Species Compliance Statement for the two species was completed (refer to Appendix H (iii) of the EIR for the full report).</p> <p>In addition, the Ecological Assessment (Jackson & Martin, 2021) commissioned for the project looked at faunal diversity at the site and the potential impacts on fauna (refer to Appendix H (ii) of the EIR).</p>
<p>Aquatic Biodiversity Theme: Very High sensitivity</p> <p>Necessitating an aquatic biodiversity impact assessment (in accordance with the protocol prescribed in GNR 320, Aquatic Biodiversity Assessment Protocols).</p> <p>Actual Sensitivity: Very High</p>	<p>Given this rating and the presence of a watercourse and in-stream dam at the site, a Freshwater Impact Assessment was undertaken by Snaddon (2021), and the findings included in the EIR (refer to Appendix H (i) of the EIR for the full report)</p>
<p>Archaeological and Cultural Heritage Theme: Very High sensitivity</p> <p>Necessitating archaeological & cultural impact assessments (General Assessment Protocols)</p> <p>Actual Sensitivity: Very High</p>	<p>The STR indicate Very High sensitivity in this regard, which is in line with the Founders Estates' state of protection as a National Heritage Site. A full Heritage Impact has been undertaken (Winter et al., 2021) which contemplated this theme and related impacts in detail (refer to Appendix H (v) of the EIR for the full HIA).</p>
<p>Civil Aviation Theme Medium sensitivity</p> <p>The need for a civil aviation assessment (in accordance with the protocol prescribed in GNR 320)</p> <p>Actual Sensitivity: Low - Negligible</p>	<p>The STR notes that the site is located within 8 and 15 km of a civil aviation aerodrome and within 15 - 35 km from a major civil aviation aerodrome/radar. This is presumably as a result of the Cape Town Flight Training Centre and/or the Paarl Landing Field and/or Stellenbosch Flying Club, all being located approx. 30km away from the site (refer to Figure 3).</p>

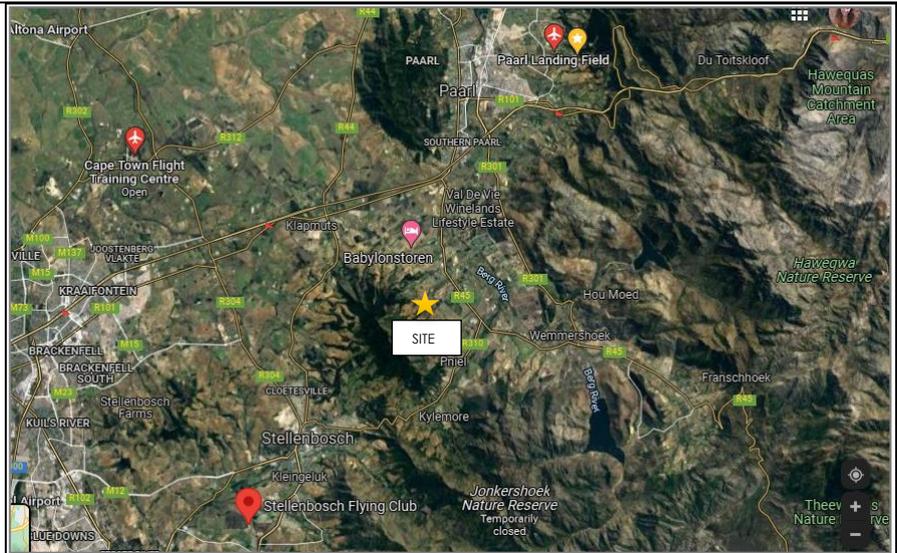


Figure 3: Civil aviation facilities within proximity to the site

The Tented Camp would, however, not affect any civil aviation activity given that the structures are not high and do not comprise any telecommunications structures that may have potential to interfere with navigation/communication. There are also no runway facilities or any other activity that could affect an aviation aerodrome or radar or its operations.

This rating is therefore disputed to, in fact, be Low- Negligible.

As such, no specialist investigations are deemed necessary.

<p>Defence Theme Low sensitivity</p> <p>Actual Sensitivity: Low</p>	<p>Defence is rated as 'Low' sensitivity by the STR as such no specialist investigations into this theme and associated impacts are deemed necessary.</p>
<p>Palaeontology Theme: Low sensitivity</p> <p>Necessitating a palaeontological assessment (General Assessment Protocols)</p> <p>Actual Sensitivity: Low</p>	<p>Palaeontology is rated as 'Low' sensitivity by the STR as such no specialist investigations into this theme and associated impacts are deemed necessary.</p> <p>Despite this, the HIA undertaken has contemplated cultural and heritage aspects in detail, including palaeontology.</p>
<p>Plant Species Theme: Medium sensitivity</p> <p>Necessitating a plant species assessment (General Assessment Protocols).</p> <p>Actual Sensitivity: Medium</p>	<p>Given the 'Medium' rating for the plant species theme (along with a Very High rating for Terrestrial Biodiversity) an Ecological Impact Assessment was undertaken for the site. The Report notes the various plant species (indigenous and alien) located within the proposed development footprint.</p> <p>The Ecological Impact Assessment is included in the EIR.</p>
<p>Terrestrial Biodiversity Theme: Very High sensitivity</p> <p>Necessitating a terrestrial biodiversity impact</p>	<p>Given the 'Very High' rating for this theme Ecological Impact Assessment was undertaken for the site. The study reports on both terrestrial plants and animal species and associated ecological impacts brought upon by the development.</p>

assessment and a plant species assessment (Terrestrial Biodiversity Assessment Protocols) Actual Sensitivity: Very High	The Ecological Impact Assessment has been included in the EIR and appended to the report (refer to Appendix H (ii))
Additional specialist studies called for by the Screening Report	
Landscape/Visual Impact Assessment (General Assessment Protocols)	A detailed HIA has been undertaken which includes a details assessment of impacts on the cultural landscape including visual considerations.
Socio-Economic Assessment (General Assessment Protocols)	<p>The socio-economic aspects of the site and proposal have been considered and addressed in the EIR through inclusion of the following:</p> <ul style="list-style-type: none"> • Socio-economic profile of the affected community and • Detailing the financial contribution of the project to the economy as well as to previously disadvantaged individuals. <p>Given the small-scale, seasonal and temporary nature of the development, a full Socio-Economic Impact Assessment is not deemed necessary.</p>
Avian Impact Assessment	<p>Avian species occurring near the site have been noted and potential impacts considered in the Ecological Impact Report.</p> <p>The specialist found that larger bird species (vultures, eagles) and waterbirds would not have been negatively influenced by the habitat removed for the Tented Camp and that the disturbance to faunal species using the site for foraging, shelter and breeding would have resulted in a Low (-) impact. Given this a more detailed Avian Impact Assessment is not deemed necessary.</p>

References:

Hawkes, P.G, 2021, FE5 (Pty) Ltd Tented Camp: Terrestrial Invertebrate Assessment, Afribugs CC, Pretoria.

Hurworth, M, 2021, Civil Engineering Services Report, MH & A Consulting Engineers, Cape Town

Jackson, A & Martin T, 2021, Boschendal Tented Camp S24G Ecological Report, Biodiversity Africa, Cape Town.

Lanz, J, 2021, Site sensitivity verification and Agricultural compliance statement for NEMA 24G Application for FE5 (Pty) Ltd Tented Camp, Wynberg.

Snaddon, K, 2021, Environmental Impact Assessment of Founders Estate 5 Tented Camp, Boschendal Estate, The Freshwater Consulting Group, Kommetjie.

Winter, S, 2021, Heritage Statement: Tented Camps, Founders Estates National Heritage Site, Boschendal Farmlands, Dwars River Valley, Stellenbosch, Muizenburg.