LORNAY
ENVIRONMENTAL CONSULTING

# SITE SENSITIVITY VERIFICATION REPORT (SSVR)

Unauthorised Clearance for the establishment of a single residential development and tourism related activities on Portion 48 of the Farm 708, Franskraal

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**Compiled by:**
Lornay Environmental Consulting (Pty) Ltd

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## INTRODUCTION

This application relates to the unauthorised clearance of approximately 1.2 ha of indigenous vegetation on Portion 48 of the Farm 708, Franskraal, undertaken to facilitate the establishment of various land uses, including a residential dwelling, wendy house, and an animal camp. The clearance was conducted without the required Environmental Authorisation (EA), leading to the disturbance of indigenous vegetation and infilling of the seep wetland.

This application therefore seeks to rectify the non-compliance in terms of the National Environmental Management Act (Act 107 of 1998, as amended), and to assess the environmental impacts of both the activities already implemented and the additional proposed tourism-related developments, including a guest house, petting farm, coffee shop, and associated infrastructure.


**Figure 1.** Locality of subject property

The preliminary layout alternative is as follows and was assessed by all specialists.

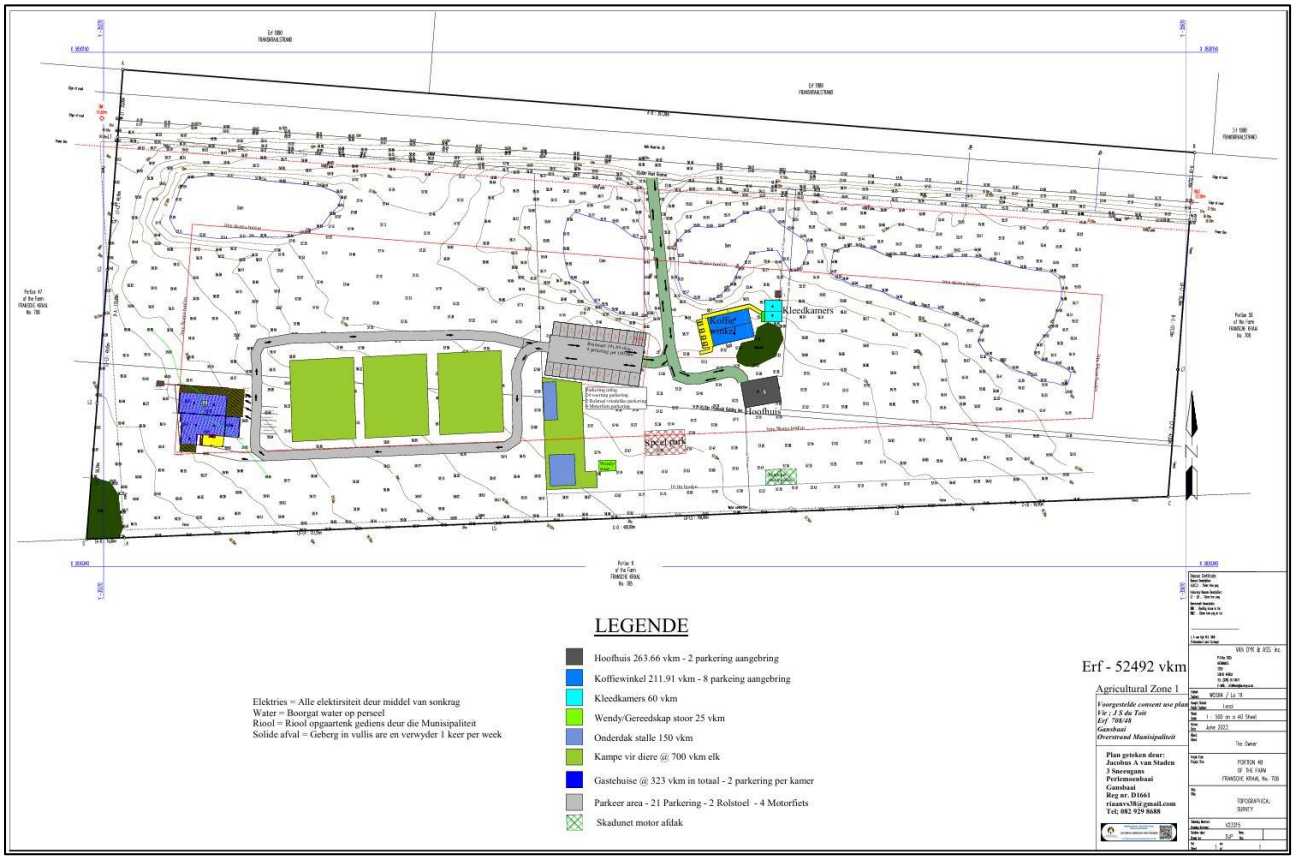


**Figure 2.** Alternative 2 (preferred) – proposed site plan for the residential development

## PURPOSE OF THE REPORT

Lornay Environmental Consulting (Pty) Ltd, was appointed to assist the application with their Section 24G Rectification application in terms of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) promulgated under the National Environmental Management Act, 1998 (No. 107 of 1998; NEMA), for the proposed project.

Based on the classification selected and the known impacts with the proposed development, the Screening Tool lists the following specialist assessments to be included in the BAR process and / or motivation as to why these specialists are not applicable to the site

- → Landscape / Visual Impact Assessment
- → Archaeological and Cultural Heritage Impact Assessment
- → Palaeontology impact assessment
- → Terrestrial Impact Assessment
- → Aquatic Biodiversity Impact Assessment
- → Socio-Economic Impact Assessment
- → Plant Species Assessment
- → Animal species assessment

**Table 1**: Environmental Sensitivities on the property

| 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 | | |
| Defence Theme | | | | X |
| Paleontology Theme | X | | | |
| Plant Species Theme | | | X | |
| Terrestrial Biodiversity Theme | X | | | |

**Agricultural Theme (High Sensitivity)**

According to the National Web-Based Environmental Screening Tool, the site has been identified as having High Agricultural Sensitivity. The subject property falls within the urban edge of the Overstrand Municipality, although it lies outside the formally built-up urban area. The property is currently zoned as Agricultural Zone I in terms of applicable land use planning regulations. The site is small and not favourable to intensive agricultural activities. In addition, no rezoning will take place and only consent use applications for the tourism activities. A small petting zoo is proposed as a form of tourist attraction for the area. The proposed activities are therefore in line with its zoning and do not have an impact in terms of the Agricultural theme.

**Animal Species Theme (High Sensitivity)**

According to the National Web-Based Environmental Screening Tool, approximately 9 animal species of conservation concern have been identified as potentially occurring on the subject property, with sensitive rating ranging as High Sensitivity. These includes, five (5) bird species, one (1) reptile species, and three (3) invertebrates species, all of which are considered to have the potential to occur on-site. While the site has been partially disturbed due to the unauthorised clearance of indigenous vegetation and the placement of infrastructure, remnant natural vegetation and surrounding habitat may still support these species.

Given the high sensitivity rating and the potential ecological importance of the site, pre-construction site walk-through will be undertaken to identify and appropriately manage the presence of any fauna, as well as nests or breeding sites.

*The Black Harrier (Circus Maurus)*

This species prefers coastal and mountain fynbos, highland grasslands, Karoo sub-desert scrub and open plains with low shrubs and croplands. Harriers breed close to coastal and upland marshes, damp sites, near vleis or streams with tall shrubs or reeds. South-facing slopes are preferred in mountain areas where temperatures are cooler and vegetation is taller. Black Harriers breed in the montane fynbos, renosterveld and strandveld habitats of the Western Cape and many individuals disperse into the karoo and grassland habitats during the autumn and winter months. The breeding success of Black Harriers is largely driven by winter rainfall in the Western Cape. The location of the farm alongside the busy R43 away from the mountain makes it less likely that the site would be used actively by this species.

The African Marsh Harrier (*Circus ranivorus*)

The African Marsh Harrier is sparsely distributed across wetlands throughout central and east Africa, and southwards to southern Africa. The African marsh harrier thrives in marshes and reedbeds, often extending its hunting grounds to open grasslands and cultivated areas near wetlands. Its presence spans from sea level to altitudes as high as 3,000 meters, with a preference for regions above 1,500 meters. This species is predominantly resident in the moister regions of southern and eastern Africa, with a range extending from the Western Cape through eastern South Africa, Lesotho, Eswatini, and into parts of Zimbabwe, Mozambique, Malawi, Tanzania, Zambia, Angola, Botswana, Namibia, and as far north as South Sudan. Disjunct populations are found in northern Tanzania, the Democratic Republic of Congo, Rwanda, Uganda, and Kenya.

Nests are typically constructed in extensive reedbeds, often high above the water, but they may also be built in sedges or even in wheat fields near wetlands. Breeding pairs construct their nests within reedbeds, sometimes well above water. They lay two to four white eggs with a blue wash, which allows for the identification of newly laid eggs. The breeding season spans from July to November.

Striped Flufftail *(Aves Sarothrura affinis)*

The Striped Flufftail typically inhabits dry upland grasslands, often near bracken, brambles, or Protea, and forest edges. They also occupy fynbos (mountain vegetation) in the Western Cape, and sometimes forage in crops like lucerne and millet. Breeding occurs in dense cover near open areas, with nests built in grass tufts. In the Western Cape, they are found in moist mountain fynbos with characteristic plants like fountain-bush (Psoralea) and mountain daisies. While they prefer dense cover for nesting, they are not typically found in standing water, though some birds may move to wetland margins in winter.

Denham's Bustards (*Neotis denhami*)

Denham's Bustards (*Neotis denhami*) are widespread in sub-Saharan Africa, primarily in grasslands, shrublands, and agricultural lands. They breed in grasslands and lowland fynbos, and sometimes stray into cultivated fields during the non-breeding season. They can be found in a considerable range of secondary habitats including dense shrubland, light woodland, farmland, dried marsh and arid plains.

Southern Black Korhaan (*Aves Afrotis afra*)

The Afrotis afra, also known as the Southern Black Korhaan or Black Bustard, is an endemic bird species in South Africa, specifically found in the southwestern part of the country. Its habitat is typically the fynbos, renosterveld, and strandveld regions of the Western and Eastern Cape provinces. It prefers semi-arid habitats such as grasslands, shrublands and savannas where it can easily prey on ground-dwelling arthropods and eat seeds. It is common to uncommon in the remnants of renosterveld and strandveld in the Western Cape, and nama karoo in the Northern Cape. It feeds on insects, small reptiles and plant material, foraging on the ground and picking up food items with its bill.

Southern Adder (*Bitis armata)*

The scientific name Bitis armata refers to the Southern Adder, a venomous snake species found in the Western Cape of South Africa. This adder is a small to medium-sized snake, typically reaching around 40 cm in length. It is characterized by its greyish-brown colour, dark blotches, and a distinctive "V" marking behind the eye. The Southern Adder is listed as

vulnerable due to its restricted habitat in coastal fynbos areas. Individuals are known to take shelter under limestone rock slabs, particularly along the coastline. They also may be found sheltering in thick grassy tussocks of restio and similar grasses.

Invertebrate-Forest Invertebrate

Invertebrates are animals that lack a backbone and make up the vast majority of animal species. In forests, they play crucial roles in various ecosystem processes, including decomposition, pollination, and nutrient cycling. They encompass a wide range of organisms like insects, spiders, worms, mollusks, and crustaceans. The site's remaining natural vegetation, particularly in the eastern portion and near the hillslope seep wetland, may continue to offer microhabitats suitable for invertebrate life, especially in association with dense shrub cover and leaf litter. The presence of remnant forest patches and intact vegetation along the eastern boundary and western boundary of the site may still support these species. Therefore, precautionary mitigation such as fencing the high sensitive areas could potentially maintain their microhabitats.

Mute Winter Katydid (*Brinckiella aptera*)

This species is endemic to the Fynbos and Succulent Karoo biomes. It probably feeds on flowers and leaves of a very narrow range of host plants and occurs primarily on low, herbaceous shrubs. This species feeds and stridulates at night but can be found basking in the daytime on sunny days during the winter and early spring, from August until October, a time when very few insects are active. While the central portion of the site has been disturbed, the remaining natural areas, particularly in the eastern and western portions may still support suitable habitat for this species. Pre-construction site walks will be undertaken.

The Yellow-winged Agile Grasshopper (*Aneuryphymus montanus*)

The species is associated with fynbos vegetation, where it has been collected amongst partly burnt stands of evergreen Sclerophyll in rocky foothills. It favours areas with rocky terrain, particularly on south-facing slopes where the vegetation is more moisture-retentive. The presence of South Coastal Forest on the southwestern portion of the site may provide suitable microhabitats for this grasshopper. Although the central portion of the site has been degraded, the likelihood of occurrence in remaining habitat areas remains reasonable, especially given the species' association with specific topographic and moisture conditions. As such, precautionary measures, including pre-construction walk-throughs and the retention of natural vegetation buffers, are recommended to reduce the risk of disturbing this sensitive, habitat-dependent invertebrate.

| Sensitivity | Feature(s) |
|---|---|
| High | Aves-Circus maurus |
| High | Aves-Circus ranivorus |
| Medium | Aves-Sarothrura affinis |
| Medium | Aves-Neotis denhami |
| Medium | Aves-Afrotis afra |
| Medium | Reptilia-Bitis armata |
| Medium | Invertebrate-Forest invertebrate |
| Medium | Invertebrate-Brinckiella aptera |
| Medium | Invertebrate-Aneuryphymus montanus |

The sites location alongside the R43 and close to the built-up urban edge of Franskraal, as well as the fact that the site was previously heavily infested with alien vegetation, as well as the fact that it is separated from the mountain slopes, are factors which reduce the habitat quality of the site, thereby making it less likely to be suitable for faunal species.

**Aquatic Biodiversity Theme (Very High Sensitivity)**

The National Web-Based Environmental Screening Tool has identified the subject property as falling within an area of Very High Sensitivity for the Aquatic Biodiversity Theme. This classification is attributed to the presence of a watercourse on the property. In response to this, an Aquatic Biodiversity Impact Assessment was undertaken by a qualified specialist. The assessment confirmed the presence of a seep wetland on-site, which has been delineated. The assessment highlights that approximately 860 m² of the hillslope seep was infilled with locally sourced fill (sand without any signs of rubble or foreign materials) which constitutes approximately 6 % of the total on-site wetland extent of 1,471 m². This relatively minor infilling would not have impacted on the seedbank and given the relatively ease with which the fill material can be removed has, in the opinion of the specialist, not caused wetland habitat loss but rather habitat disturbance with biota loss, primarily plant species as the more mobile fauna would have escaped the infilling.

**Archaeological and Cultural Heritage Theme (Low Sensitivity)**

The unauthorised clearance of indigenous vegetation occurred within a portion of land zoned as Agricultural Zone I - a land use designation intended primarily for agricultural activities, including the establishment of a single residential dwelling and associated low-impact infrastructure.

Given the low sensitivity rating and the current land use designation, the activities undertaken are not anticipated to have impacted any known archaeological or cultural heritage resources. Furthermore, no heritage resources were observed during site inspections or indicated through existing heritage databases. As such, no further heritage specialist assessment is required.

Furthermore, the activity did not trigger the provisions of the National Heritage Resources Act (NHRA) (1999) and therefore a Notice of Intent to Develop was not required.

**Civil Aviation Theme (High Sensitivity)**

The proposed development, comprising a single residential dwelling, tourism-related activities (including a guest house and petting farm), and associated low-rise infrastructure does not involve tall structures, reflective surfaces, or activities that would interfere with civil aviation operations. Given the small scale and low elevation of the infrastructure, the development is unlikely to pose any risk to civil aviation safety or navigational systems. As such, no further assessment required.

**Defence Theme (Low Sensitivity)**

No impacts on defence related activities are anticipated, as the proposed development site is situated within an agricultural zone. Given that the area does not intersect with any defence zones or areas of high strategic importance, no further assessment is required for this theme.

**Palaeontology Theme (Very High Sensitivity)**

Portion 48 of the farm Fransche Kraal no. 708 is not situated within the Heritage Overlay Zone as determined by the Overstrand Municipality Growth Management Strategy (2010). The subject farm portion is not associated with any important persons or groups or important events and activities and has no association with the history of slavery and is not used for living heritage. Although the site has been previously disturbed through the unauthorised clearance of indigenous vegetation and minor infrastructure development, these activities are not considered to have resulted in deep excavations that would typically expose fossiliferous material. If fossil remains and materials are discovered during construction activities, work must be halted immediately in the affected area, and the relevant heritage authority must be notified for further guidance.

**Plant Species Theme** *(Medium Sensitivity)*

The Terrestrial Biodiversity Impact Assessment was undertaken by Nick Helme Botanical Surveys. The vegetation on the site, and presumably in the cleared area, is a mix of Overberg Dune Strandveld (Endangered) and Agulhas Limestone Fynbos (Critically Endangered; Government of South Africa 2022). The 1.2ha cleared area was of Low, Medium and High botanical conservation value, and may have supported as many as three plant SoCC. All three plants species of conservation concern are still found elsewhere on the property and are restricted to the remaining High sensitivity areas. All mitigation noted in Section 7 of the Terrestrial Biodiversity Impact Assessment are considered feasible, reasonable and essential, and must be timeously and properly implemented, in which case the post mitigation impact of the unauthorised clearing could be reduced to Low negative, from Low to Medium negative prior to mitigation. No additional biodiversity offset or fine is deemed necessary if the mitigation outlined in Section 7 of the Terrestrial Biodiversity Impact Assessment properly and timeously implemented.

**Terrestrial Biodiversity Theme** *(Very High Sensitivity)*

The Terrestrial Biodiversity Impact Assessment was undertaken by Nick Helme Botanical Surveys. The vegetation on the site, and presumably in the cleared area, is a mix of Overberg Dune Strandveld (Endangered) and Agulhas Limestone Fynbos (Critically Endangered; Government of South Africa 2022). The study area is relatively flat, with a slight depression running from west to east along the northern boundary, which marks the wetland area and direction of drainage. The soils on site are fairly deep alkaline to neutral sands, with underlying calcrete in the southern section, and patches of ferricrete (koffieklip) and associated clays and sandy loams in the northeast. There is thus something of a perched water table in the area (as sands are permeable but clays, calcrete and ferricrete are generally not), and in the wet season the northern part of the site is essentially a wetland. The soils range from white sands to dark loams, and the latter are strongly indicative of wetland conditions. The sandier parts of the study area are better drained than the peaty, loamy soils, and slowly grade into each other. The vegetation in the southwestern part of the property area was burned in late 2018. The disturbance on the property, starting with near total bush clearing in 2011/2012, and then progressive invasion by *Acacia cyclops* and *Acacia saligna* in the subsequent decade.

**Specialist Assessments Identified by Screening Tool**

**Landscape/Visual Impact Assessment:**

Given the agricultural context and the transformation of the landscape, this assessment will not be included as part of the environmental impact evaluation. No further assessment required.

**Archaeological and Cultural Heritage Impact Assessment:**

As the land has already undergone significant agricultural modification, the likelihood of impacting undiscovered archaeological or cultural heritage is very low or negligible. In terms of the NHRA, the activities did not trigger the need to submit an application to Heritage Western Cape. No further assessment required.

**Palaeontological Impact Assessment:**

As indicated above, the site has already been impacted. No further assessment required.

**Terrestrial Biodiversity Impact Assessment:**

This assessment was conducted and incorporated on the Botanical Assessment report, see Appendix F2 .

**Aquatic Biodiversity Impact Assessment:**

Approximately 860 m² of the hillslope seep was infilled with locally sourced fill (sand without any signs of rubble or foreign materials) which constitutes approximately 6 % of the total on-site wetland extent of 1,471 m². This relatively minor infilling would not have impacted on the seedbank and given the relatively ease with which the fill material can be removed has, in the opinion of the specialist, not caused wetland habitat loss but rather habitat disturbance with biota loss, primarily plant species as the more mobile fauna would have escaped the infilling.

**Socio-Economic Impact Assessment:**

The proposed activity is expected to yield positive socio-economic benefits for the community, with no negative impacts identified. No further specialist input required.

**Plant Species Assessment:**

This assessment is covered by the Terrestrial Biodiversity Impact Assessment, refer to Appendix F2.

**Animal Species Assessment:**
While the site has been partially disturbed due to the unauthorised clearance of indigenous vegetation and the placement of infrastructure, remnant natural vegetation and surrounding habitat may still support these species. Given the high sensitivity rating and the potential ecological importance of the site, pre-construction site walk-through will be undertaken to identify and appropriately manage the presence of any fauna, as well as nests or breeding sites. No further assessment is required.

## PRELIMINARY SITE ASSESSMENT

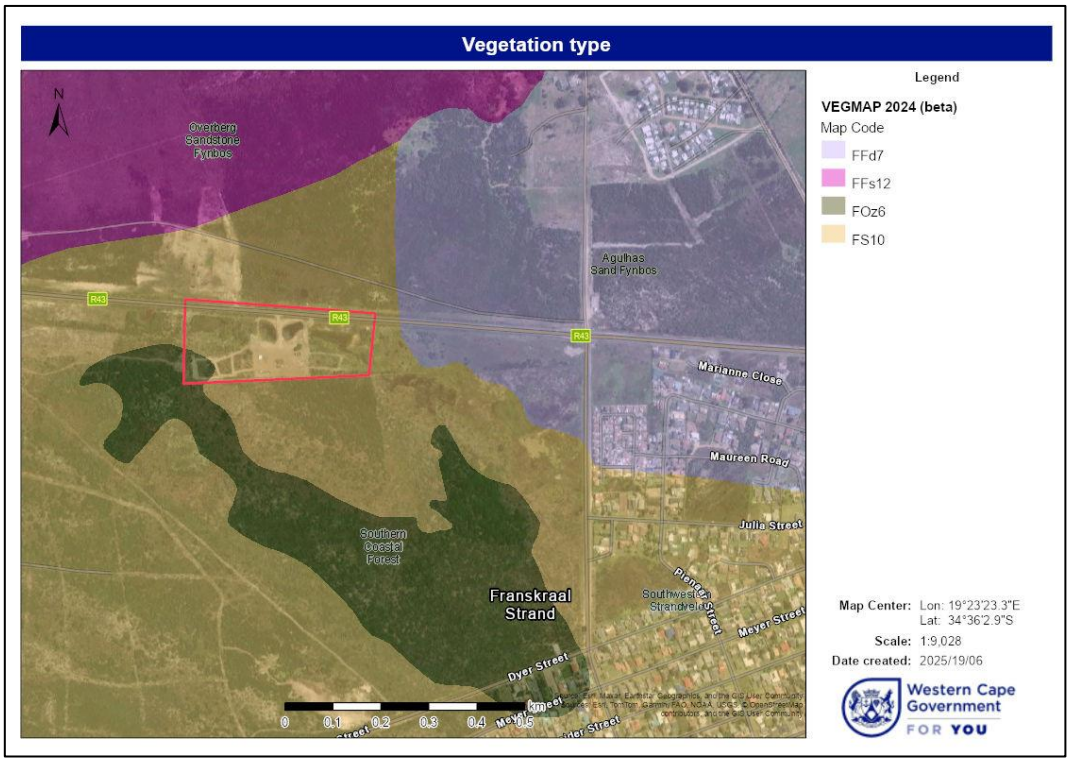


**Figure 3:** Vegetation type associated with the subject property.

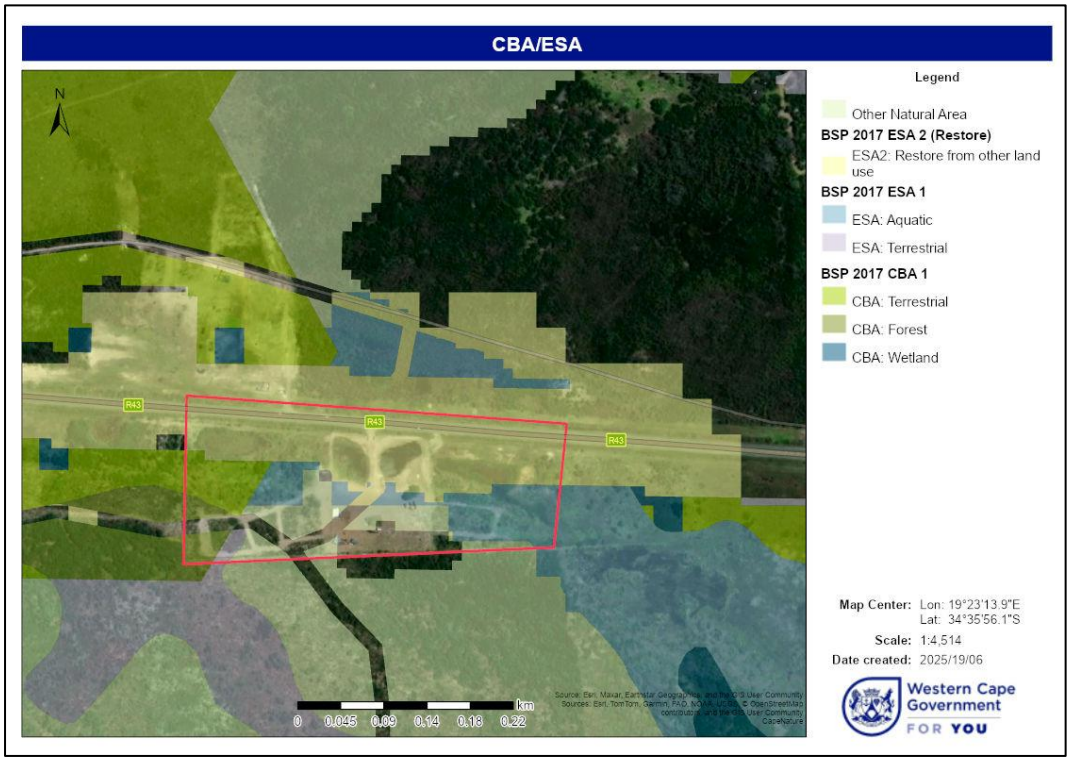


**Figure 4:** CBA/ ESA Mapping associated with the subject property.

## CONCLUSION

The following specialists were appointed:

→ **Aquatic/Freshwater Specialist**: The Freshwater specialist was consulted to compile Aquatic Biodiversity Impact Assessment due to presence of a wetland on site. The relatively minor infilling would not have impacted on the seedbank and given the relatively ease with which the fill material can be removed has, in the opinion of the specialist, not caused wetland habitat loss but rather habitat disturbance with biota loss, primarily plant species as the more mobile fauna would have escaped the infilling.

→ **Terrestrial/Botanical Specialist**: A Terrestrial Biodiversity Impact Assessment was undertaken by Nick Helme Botanical Surveys. The vegetation map of South Africa (Mucina & Rutherford 2006 and online update dated 2024) indicates that most of the original vegetation type present on site is mapped as Agulhas Limestone Fynbos, with a patch of Southern Coastal Forest in the southwest. In reality the vegetation on site is a mix of four different vegetation types – and could be best described as Overberg Dune Strandveld (Endangered) in the southern parts, and Elim Ferricrete Fynbos (Critically Endangered) in the northern (wetland) section, although the latter is not formally mapped as occurring closer than Uilenkraal, some 17km away. The 1.2ha cleared area was of Low, Medium and High botanical conservation value, and may have supported as many as three plant SoCC. All three are still found elsewhere on the property and are restricted to the remaining High sensitivity areas.

Kind regards,

MNaylor

**MICHELLE NAYLOR**