LORNAY
ENVIRONMENTAL CONSULTING

SITE SENSITIVITY VERIFICATION REPORT (SSVR)

Unauthorised Clearance of Vegetation on Portion 2 of the Farm Annex Klein Zout Rivier No. 39, Napier, Bredasdorp RD

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Compiled by:
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1. INTRODUCTION

A Site Sensitivity Verification was undertaken for Portion 2 of the Farm Annex Klein Zout Rivier No. 39, located near Napier in the Overberg District Municipality. The purpose of this verification was to assess and confirm the environmental sensitivities associated with the site and to determine the presence and extent of any sensitive environmental features that may be affected by the agricultural activities undertaken on the property.

The site sensitivity verification was conducted in accordance with the requirements of the National Environmental Management Act (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), including the National Web-Based Environmental Screening Tool. The Screening Tool identifies environmental sensitivities across a range of themes, including terrestrial biodiversity, aquatic biodiversity, plant species, animal species, agricultural land capability, and other relevant environmental features, which are described in detail under Section 2 of this report.

The objective of this report is to verify the sensitivities identified by the Screening Tool through site-specific assessment and specialist input, and to confirm whether the proposed and existing agricultural activities are located within areas of low, medium, or high environmental sensitivity. This process assists in ensuring that environmental impacts are appropriately assessed and managed, and that sensitive areas are avoided and protected.

The verification process included a review of available spatial datasets, specialist terrestrial biodiversity findings, and site observations. Particular attention was given to identifying remaining natural vegetation, riparian areas, previously transformed agricultural areas, and any areas of conservation concern.

The findings of this Site Sensitivity Verification Report will inform the environmental assessment process and guide the implementation of appropriate mitigation measures and environmental management actions for Portion 2 of Farm Annex Klein Zout Rivier No. 39.

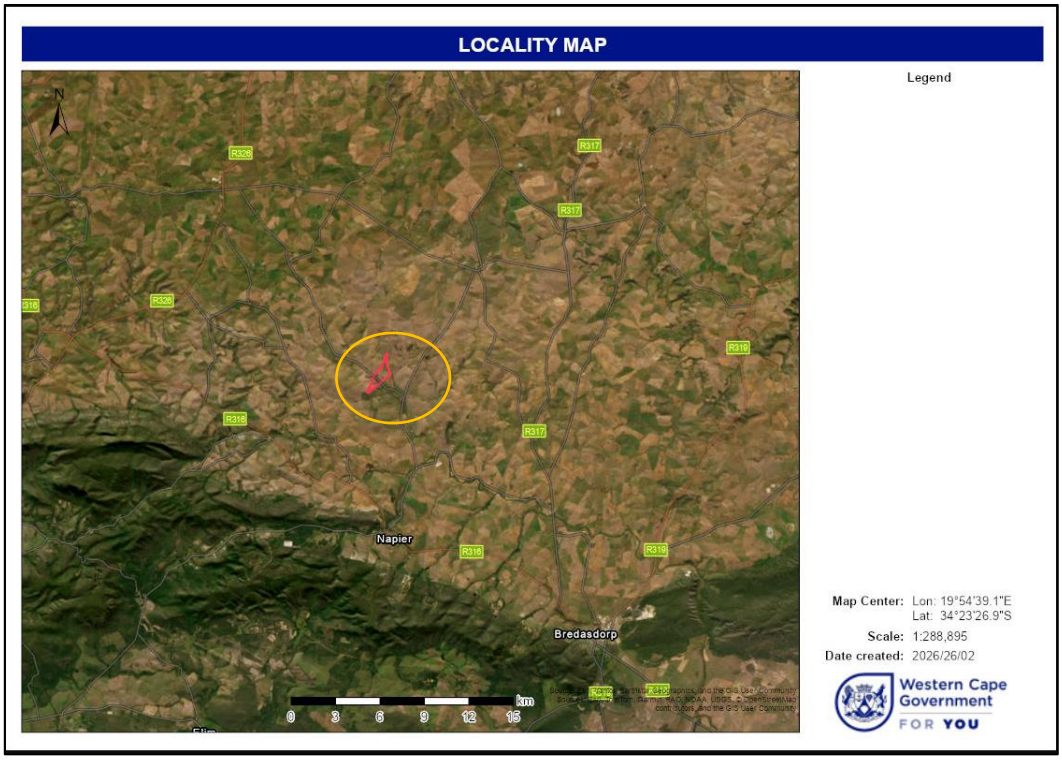

Figure 1. Locality of subject property.

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

Figure 2. Alternative 2 (preferred) – Site plan of the cleared are to be utilised for agricultural purposes.

2. PURPOSE OF THE REPORT

Lornay Environmental Consulting (Pty) Ltd, was appointed to undertake the required Environmental Authorisation (EA) application process 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

3. ENVIRONMENTAL SENSITIVITY CONTEXT

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 *(Very - High Sensitivity)*

The National Web-Based Environmental Screening Tool classifies the site as having Very High Agricultural Sensitivity, which reflects the high agricultural value and productivity of the broader Overberg region. This classification is primarily linked to the presence of suitable soils, favourable climatic conditions, and the established agricultural character of the landscape. The subject property forms part of a predominantly agricultural area, with surrounding farms actively utilised for dryland crop production and livestock farming.

The area affected by the unauthorised clearance is located within a historically transformed portion of the property that had previously been cleared and utilised for agricultural purposes. The clearance and cultivation activities were undertaken within the existing agricultural footprint and did not result in the loss of undeveloped agricultural land or alter the agricultural land capability of the property. The activity is therefore consistent with the established land use and agricultural zoning of the property and the surrounding area.

Given that the site is already used for agricultural production, and the activity represents the continuation of dryland cultivation within a transformed agricultural landscape, the agricultural sensitivity identified by the Screening Tool reflects the broader regional agricultural value rather than a site-specific environmental constraint. As such, no further specialist agricultural assessment is considered necessary, as the activity does not compromise the agricultural potential of the land.

Animal Species Theme *(High Sensitivity)*

The Screening Tool classifies the site as having High Animal Species Sensitivity, which indicates the potential presence of species of conservation concern or habitats that may support important faunal populations. This sensitivity classification is applied at a regional scale and reflects the ecological importance of the Overberg landscape, which contains remnant natural vegetation and supports a range of fauna.

A site inspection conducted by the Environmental Assessment Practitioner confirmed that the affected area is located within an agricultural landscape. The ecological functionality of the cleared footprint is considered to be low due to historical agricultural disturbance, which has reduced the suitability of the site for supporting sensitive or habitat-dependent fauna. The clearance activities were confined to an already transformed portion of the property and did not result in the removal of extensive or intact natural habitat.

Denham's Bustard (*Neotis denhami*)

Denham's Bustard typically occurs in natural vegetation types such as fynbos and grasslands, as well as in pastures and agricultural fields (Allan, 2005). The species is currently listed as Vulnerable in South Africa (Taylor, 2015c), with the main threats to its survival being powerline collisions (Shaw et al., 2010), habitat conversion to intensive monoculture farming, and the overgrazing of grassland habitats. Biodiversity databases such as iNaturalist and GBIF indicate multiple occurrence records within the Overberg region, particularly in the open plain areas, where Denham's Bustards frequently utilise open agricultural fields for foraging and movement. The project site, comprising a mosaic of cultivated land interspersed with remnant patches of natural vegetation, therefore falls within a broader agricultural landscape that may be utilised by the species.

It is important to note, as confirmed by the botanical specialist that the vegetation onsite (cleared areas) was mainly natural and secondary floodplain vegetation and not of the Central Ruens Shale Renosterveld. Therefore, the clearance of approximately 7.4 ha of vegetation was mainly restricted within the footprint of the historically ploughed land that only consist of transformede vegetation. The remaining intact vegetation along the northern boundary of the farm, combined with the extensive agricultural matrix of the surrounding Overberg plains, provides continued habitat availability for Denham's Bustard.

From a project perspective, the residual impact of the clearance on this species is considered low, given the site location. However, the surrounding vegetation type outside the cleared footprint provides enough habitat for the spaces foraging and movement. The mitigation measures which are provided by the specialist have been included in the EMP to ensure that the species is protected. Therefoe, it is for this reason that an animal species assessment is not required.

Yellow-winged Agile Grasshopper (*Aneuryphymus montanus*)

According to Venter, (2024) this endemic grasshopper species occurs on Western and Eastern Cape mountain and is listed as 'Vulnerable'. It has been recorded from near Clanwilliam eastwards towards East London, associated with different fynbos types occurring on south-facing, cool slopes (Brown 1960). Brown (1960) mentions the species being collected "amongst partly burnt stands of evergreen sclerophyll in rocky foothills". Sites where the species have been documented include Graafwater, close to Lambert's Bay, De Rust, Suurbraak, Bot River, Kogelberg and Joubertinia. The species seems to show preference for rocky, mountainous areas (Venter, 2024).

The project site consists of previously cultivated land and secondary floodplain vegetation and does not provide the rocky montane habitat typically preferred by this species. While the broader Overberg region contains suitable habitat, the cultivated footprint itself is unlikely to support significant populations of this species. The limited scale of the clearance and the transformed nature of the site further reduce the likelihood of significant impacts. Furthermore, the botanical specialist assessment confirmed that the vegetation within the cultivated footprint is largely secondary and natural floodplain vegetation and does not represent intact or high-quality natural habitat associated with the Central Ruens Shale Renosterveld vegetation type. The existing condition of the site, together with the absence of rocky slopes and intact fynbos vegetation, significantly reduces the likelihood of the species occurring within the affected area.

Therefore, the unauthorised clearance and subsequent cultivation activities within the previously transformed footprint are considered unlikely to have resulted in significant impacts on the Yellow-winged Agile Grasshopper. The residual impact on this species is assessed to be low, particularly as remaining natural vegetation and sensitive habitats on the property have been identified and designated as No-Go areas, which will remain protected from disturbance.

Aquatic Biodiversity Theme *(Very – High Sensitivity)*

The National Web-Based Environmental Screening Tool identifies the site as having Very High Aquatic Biodiversity Sensitivity, primarily due to the presence of a non-perennial drainage line located within the broader study area. This sensitivity rating reflects the ecological importance of aquatic features and their associated riparian zones, which may provide habitat for aquatic and semi-aquatic species, contribute to ecological connectivity, and support important ecosystem functions such as water flow regulation and sediment control.

Site verification and specialist input confirmed the presence of a non-perennial drainage line traversing between the previously cleared portions of the site. Importantly, the 7.4 ha clearance footprint was confined to historically transformed agricultural areas and did not directly encroach upon the drainage line or its associated riparian vegetation, as confirmed by the specialist assessment. The drainage line and its associated 5 m buffer have been identified as environmentally sensitive features and have been formally designated as No-Go areas on the property.

The riparian zone associated with the drainage line provides important ecological functions, including habitat provision, erosion control, and the maintenance of local hydrological processes. Although the Screening Tool assigns a Very High sensitivity rating at a regional scale, the site-specific verification confirms that the unauthorised clearance did not result in the direct loss or modification of aquatic habitat.

Provided that the drainage line and the recommended 5m buffer are maintained in a natural and undisturbed state, and that no further encroachment or cultivation occurs within these areas, the residual impact on aquatic biodiversity is considered to be low. Ongoing protection of the drainage line and associated riparian vegetation will ensure the continued functioning of aquatic ecological processes and compliance with environmental management requirements.

Archaeological and Cultural Heritage Theme *(Very – High Sensitivity)*

The unauthorised clearance of indigenous vegetation occurred within an area designated as Agricultural Zone 1, a zoning specifically intended for agricultural purposes. This classification indicates that the land use is aligned with the primary function of agriculture, including activities such as cultivation. The surrounding area is characterised by extensive agricultural transformation, with significant portions of the landscape already converted to intensive farming operations. This historical and ongoing agricultural activity has influenced the cultural and environmental context of the region, resulting in a landscape where natural features and indigenous vegetation have been systematically altered to support farming practices.

Although the Archaeological and Cultural Heritage Theme is rated as having high sensitivity, it is essential to consider that the specific area in question forms part of an established agricultural landscape. The NHRA (Act 25 of 2008) is not applicable to the proposed development:

Section 38 of the Act states as follows:
38. (*1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorised as-*
(a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
(b) the construction of a bridge or similar structure exceeding 50m in length;
(c) any development or other activity which will change the character of a site-
(i) exceeding 5 000 m^2 in extent; or
(ii) involving three or more existing erven or subdivisions thereof; or

(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
(iv) the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
(d) the re-zoning of a site exceeding 10 000 m^2 in extent; or
(e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.

Given this and the transformed site and surroundings, no further Heritage Impact Assessment is required.

Civil Aviation Theme *(High Sensitivity)*

The proposed site is located within Agricultural Zone 1, which aligns with the current agricultural land use in the area. Given the established agricultural context, there are no anticipated impacts on civil aviation operations or air traffic. Since the land is already designated for agricultural purposes and does not interfere with aviation infrastructure or regulations, no further assessment is deemed necessary.

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)*

The subject property is located within Agricultural Zone 1, a designation that aligns with ongoing agricultural activities in the area. As the land is actively used for farming, the natural features and geological strata in the region have already been significantly altered by agricultural practices. Based on the existing land use and transformation of the landscape, no further palaeontological assessment is considered necessary for this application.

Plant Species Theme *(Medium Sensitivity)*

The National Web-Based Environmental Screening Tool identifies the site as having Medium Plant Species Sensitivity. A Terrestrial Biodiversity Impact Assessment was undertaken to evaluate the potential impacts of the clearance and cultivation activities on vegetation and plant species of conservation concern.

According to the South African Vegetation Map (2024), the broader property is mapped as Central Ruens Shale Renosterveld, which is classified as a Critically Endangered ecosystem type due to significant historical transformation across its distribution range. However, the botanical specialist site assessment confirmed that the vegetation present within the 7.4 ha cleared footprint does not represent intact Central Ruens Shale Renosterveld. Instead, the vegetation within the affected area was identified as natural and secondary floodplain vegetation, which has been influenced by past agricultural disturbance and transformation.

No plant species of conservation concern were recorded within the 7.4 ha cleared area during the specialist site visit. The clearance therefore resulted in the loss of natural and secondary floodplain vegetation only and did not impact intact renosterveld remnants or confirmed threatened plant species within the cleared footprint.

While the loss of 7.4 ha of floodplain vegetation represents a localised reduction in natural vegetation cover, the affected area does not constitute high-quality or intact Critically Endangered vegetation. Sensitive

vegetation areas identified on the property, including renosterveld remnants and riparian zones, have been delineated as No-Go areas and will remain protected from further disturbance.

Terrestrial Biodiversity Theme *(Very High Sensitivity)*

The National Web-Based Environmental Screening Tool identifies the site as having Very – High Terrestrial Biodiversity Sensitivity. This classification is primarily due to the mapped occurrence of Central Ruens Shale Renosterveld, which is listed as a Critically Endangered ecosystem. The high sensitivity rating reflects the regional conservation importance of this vegetation type and the extent to which it has been historically transformed across the Overberg landscape.

Although the broader property is mapped as occurring within a Critically Endangered vegetation type, site-specific verification and the findings of the Terrestrial Biodiversity Impact Assessment confirmed that the 7.4 ha cleared footprint does not contain intact Central Ruens Shale Renosterveld. Instead, the vegetation within the affected area was identified as natural and secondary floodplain vegetation that has been influenced by historical agricultural activities and disturbance.

The clearance activities were confined to a previously transformed portion of the property and did not result in the removal of intact or high-quality renosterveld remnants. Remaining areas of natural vegetation, including any confirmed renosterveld patches and riparian features, have been identified and designated as No-Go areas to prevent further disturbance.

While the Screening Tool assigns a Very High sensitivity at a regional scale due to the conservation status of the mapped vegetation type, the site-specific verification indicates that the cultivated footprint itself is ecologically transformed and of lower biodiversity value. Accordingly, the verified terrestrial biodiversity sensitivity of the 7.4 ha cleared area is considered to be lower than the regional classification, provided that the remaining natural areas on the property are retained and protected. It is further concluded that the unauthorized clearing is unlikely to have significantly disrupted broad-scale ecological processes or hindered the achievement of conservation targets, given the transformed nature of a large portion of the site and the absence of critical habitat for species of concern.

Specialist Assessments Identified by Screening Tool

The National Web-Based Environmental Screening Tool identified several specialist assessments based on the property's mapped sensitivities. A review of the site-specific conditions, historical land use, and specialist inputs has confirmed the applicability of these requirements, as outlined below.

Landscape / Visual Impact Assessment

The site is located within an established agricultural landscape that has been historically transformed through cultivation activities. The surrounding area is characterised by similar agricultural land uses, with no visually sensitive receptors identified in proximity to the site. Given the transformed nature of the landscape and the absence of significant visual resources, a Landscape and Visual Impact Assessment is not considered necessary for this application. No further assessment is required.

Archaeological and Cultural Heritage Impact Assessment

The property has undergone extensive historical agricultural transformation, significantly reducing the likelihood of intact or undiscovered archaeological or cultural heritage resources occurring onsite. In terms of the National

Heritage Resources Act (Act 25 of 1999), the activities undertaken did not trigger a requirement to submit an application to Heritage Western Cape. Based on the histooriclly disturbed nature of the site and the limited extent of the unauthorised clearance, the probability of impacting heritage resources is considered negligible. No further assessment is required.

Palaeontological Impact Assessment

The site has been previously transformed through agricultural activities. As such, the potential for intact palaeontological resources to occur within the affected footprint is considered very low. Given the disturbed condition of the site and the absence of sensitive geological exposures within the impacted area, a Palaeontological Impact Assessment is not warranted. No further assessment is required.

Terrestrial Biodiversity Impact Assessment

A Terrestrial Biodiversity Impact Assessment was undertaken (refer to Appendix G1). The assessment confirmed that the clearance activities were confined to historically transformed agricultural land. No intact or sensitive terrestrial vegetation communities were impacted beyond what has already been assessed in the botanical specialist study. This requirement has been adequately addressed.

Aquatic Biodiversity Impact Assessment

The Screening Tool identified aquatic sensitivity within the broader study area. However, as confirmed in the Aquatic Biodiversity Compliance Statement, no watercourses or wetlands were directly affected by the activity undertaken onsite.

Although a non-perennial drainage line traverses the property, site verification confirmed that:

- The clearance activities did not occur within the drainage line.
- No riparian vegetation was removed.
- The drainage line and a recommended 5m buffer have been designated as No-Go areas.

Given that no aquatic features were impacted, and no modification of aquatic habitat occurred, a full Aquatic Biodiversity Impact Assessment is not required. No further specialist assessment is required.

Socio-Economic Impact Assessment

The activity is not expected to result in any negative socio-economic impacts. On the contrary, it is anticipated to generate positive local economic benefits through continued agricultural use and associated employment opportunities. Given the limited scale of the activity and the absence of adverse impacts, a separate Socio-Economic Impact Assessment is not required. No further specialist input is required.

Plant Species Assessment

The Plant Species Assessment requirement is addressed within the Terrestrial Biodiversity Impact Assessment (refer to Appendix G1). The botanical specialist confirmed that the affected areas consist primarily of historically transformed agricultural land and secondary vegetation. No plant Species of Conservation Concern were recorded within the cleared footprint. This requirement has been adequately addressed.

Animal Species Assessment

A separate faunal impact assessment is not considered necessary for this application. The site has been historically cleared and transformed for agricultural purposes. The vegetation present within the cleared area comprises secondary and floodplain vegetation of limited ecological integrity. Given the modified condition of the site and the absence of intact natural habitat, the likelihood of significant impacts on faunal Species of Conservation Concern is considered low. No further specialist assessment is required.

4. PRELIMINARY SITE ASSESSMENT

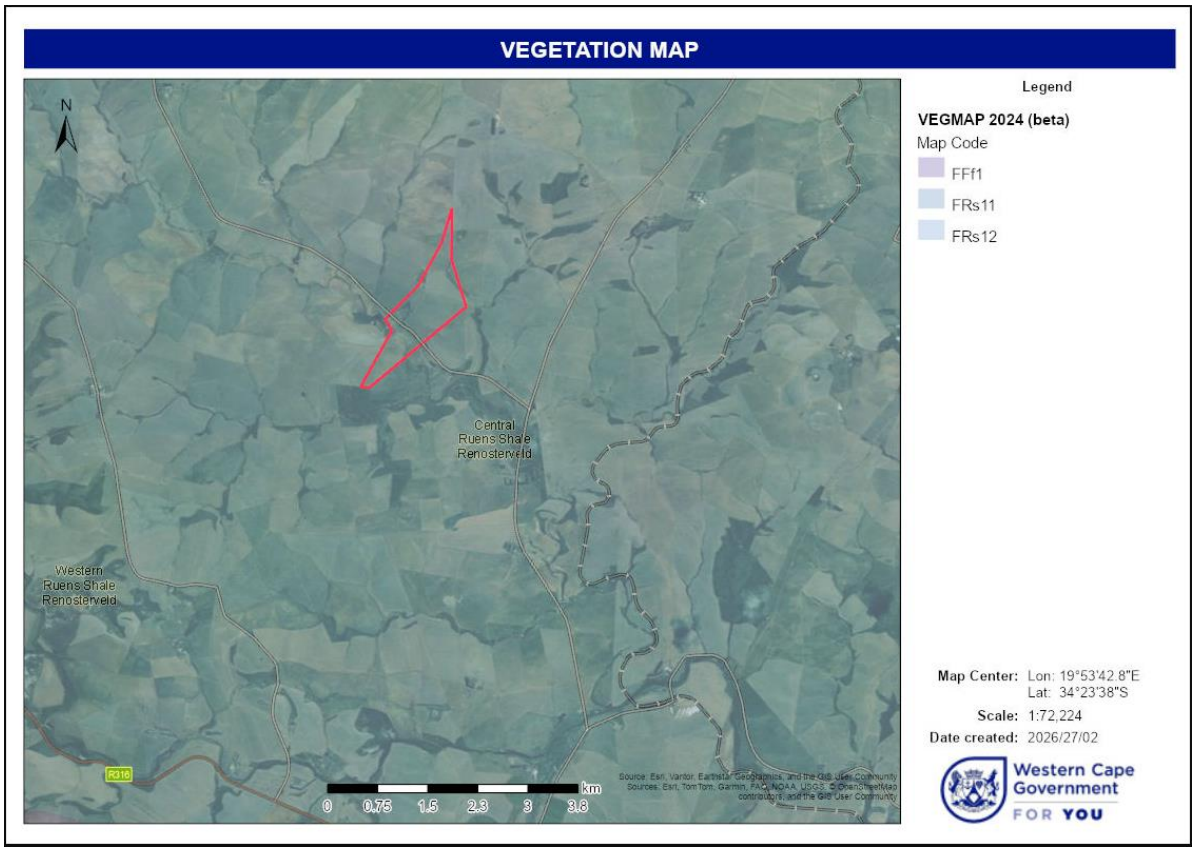

Figure 3: Vegetation type associated with the subject property.

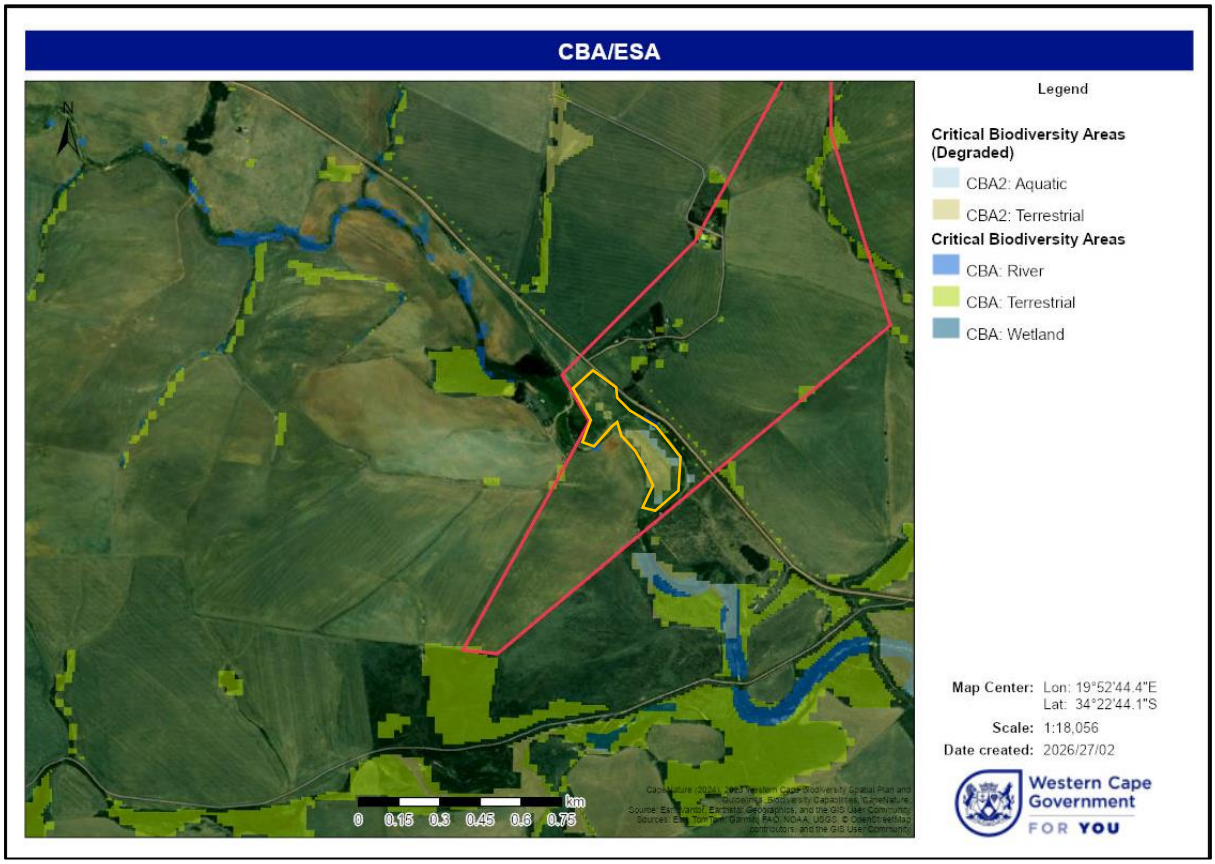

Figure 4: Shows that most of the areas that portions of the cleared areas are mapped as CBA2.

Photo 1. Showing a portion of the cleared area in relation to the non-perennial drainage line traversing between the previously transformed sections of the site. The image illustrates that the clearance activities did not extend into the drainage line or its associated riparian zone.

Photo 2. Western portion of the cleared area, including visible jeep tracks associated with agricultural access. The photograph demonstrates the historically disturbed nature of the site and ongoing agricultural land-use practices beyond the site.

Photo 3. Intact indigenous vegetation visible in the foreground, with the cleared agricultural area in the background. This image highlights the contrast between remaining natural vegetation and the transformed footprint.

Photo 4. A representative section of the cleared area, illustrating the absence of intact natural vegetation within the cultivated footprint.

Photo 5. View illustrating the broader agricultural context of the site, demonstrating that the cleared area forms part of a larger transformed landscape.

Photo 6. Additional perspective of the cleared footprint, confirming the level of disturbance and the predominance of secondary or transformed vegetation.

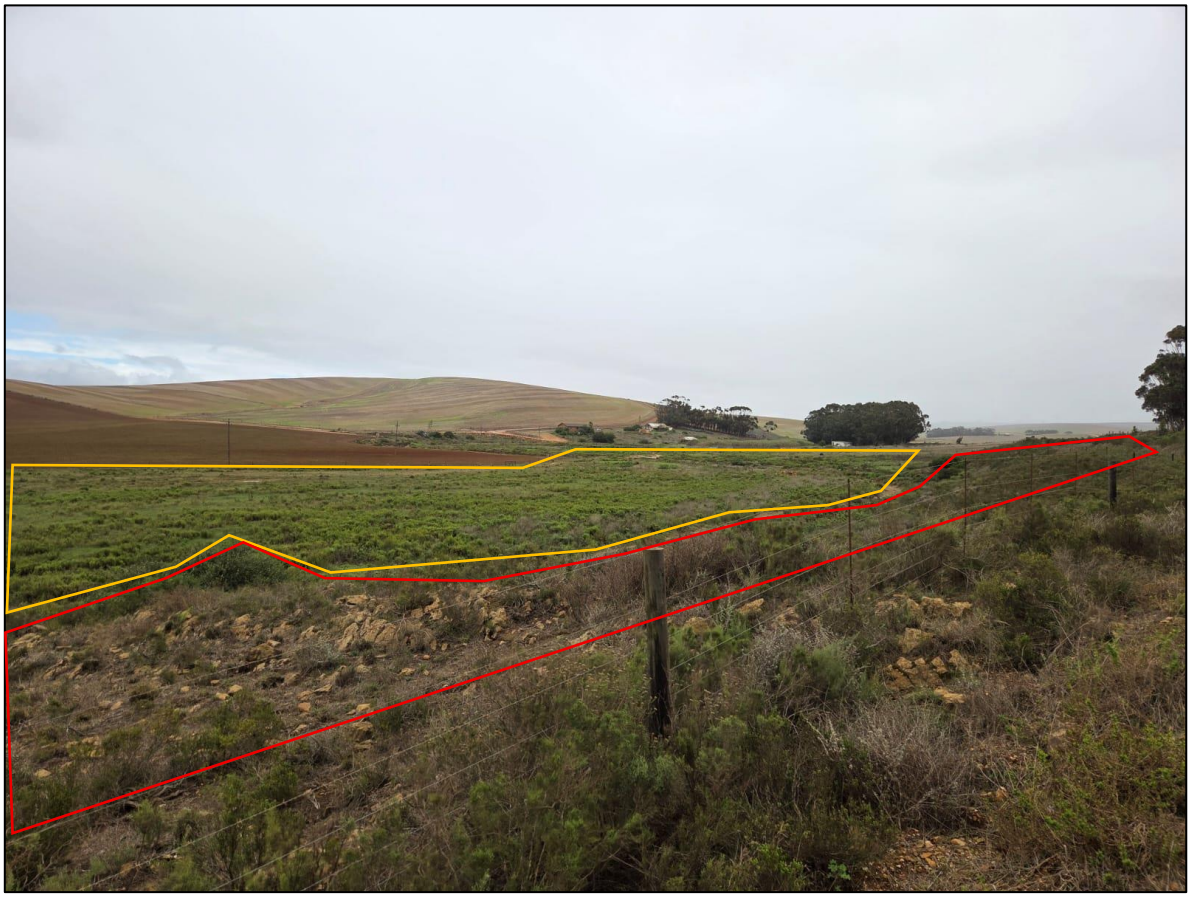

Photo 7. Photograph depicting the boundary between cleared land (Orange) and retained nature (Red).

5. CONCLUSION

The Site Sensitivity Verification undertaken for Portion 2 of Farm 39 confirms that, while the National Web-Based Environmental Screening Tool assigns areas of Very High sensitivity for certain environmental themes, the site-specific investigation and specialist inputs provide important contextual clarification.

The Very High Terrestrial Biodiversity sensitivity is primarily linked to the regional mapping of Central Rûens Shale Renosterveld, which is listed as Critically Endangered. However, the botanical specialist confirmed that the 7.4 ha cleared footprint did not comprise intact Renosterveld, but rather natural and secondary floodplain vegetation within a historically transformed agricultural landscape. The cleared area was historically cultivated in 2003 and exhibits low ecological integrity. Importantly, intact indigenous vegetation outside the cultivated footprint remains undisturbed and has been identified as No-Go areas to prevent further habitat loss.

With respect to the Aquatic Biodiversity Theme, the Very High sensitivity rating is attributed to the presence of a non-perennial drainage line within the broader study area. Site verification confirmed that the drainage line traverses between the cleared portions but was not directly impacted by the unauthorised clearance. The drainage line and its associated 5 m buffer have been demarcated as

environmentally sensitive No-Go areas. Provided these areas remain protected and no further encroachment occurs, the residual impact on aquatic biodiversity is considered low.

The Agricultural Theme sensitivity reflects the broader agricultural character of the region. The clearance occurred within land already utilised for cultivation and is consistent with the historical land-use pattern of the property and surrounding farms. No highly productive or unique agricultural resources were compromised beyond the already transformed footprint.

The Plant Species and Animal Species Themes were assessed through site inspection and specialist input. No plant species of conservation concern were recorded within the cleared area. Although certain species of conservation interest may occur within the broader Overberg landscape, the transformed nature of the cultivated footprint limits its suitability as critical habitat. The scale of the clearance relative to the extensive surrounding agricultural matrix further reduces the likelihood of significant faunal impacts.

In summary, the site verification confirms that the high sensitivity ratings generated by the Screening Tool are largely precautionary and regionally derived. At a site-specific level, the unauthorised clearance of 7.4 ha resulted in the loss of floodplain vegetation within a historically transformed agricultural area and did not directly impact intact Critically Endangered Renosterveld or aquatic features. With the formal protection of identified No-Go areas and implementation of appropriate environmental management measures, no significant residual impacts are anticipated. The findings of this Site Sensitivity Verification therefore support the conclusion that no additional specialist assessments are required beyond those already undertaken, and that the activity, as it occurred within the transformed footprint, does not pose unacceptable environmental risk when considered in its local context.