LORNAY
ENVIRONMENTAL CONSULTING

Site Sensitivity Verification Report

Portion 125 and Portion 126 of Farm No. 559 and Reminder of the Farm No. 562, Caledon RD

APRIL 2025

Consultant:

Michelle Naylor | Env. Consultant **|** M.Sc., Pr. Sci. Nat., EAPASA. 2019/698
cell: 083 245 6556 **|** fax: 086 585 2461 **|** michelle@lornay.co.za **|** www.lornay.co.za
PO Box 1990, Hermanus, 7200
Lornay Environmental Consulting Pty Ltd**|** Reg 2015/445417/07

DOCUMENT CONTROL SHEET

ISSUED BY: Lornay Environmental Consulting (Pty) Ltd
Michelle Naylor
PO Box 1990
Hermanus
7200
Tel: 028 316 1769
Fax: 086 585 2461
www.lornay.co.za

CLIENT: GF Fourie

TITLE: Site Sensitivity Verification Report for the Proposed single residential dwelling

REFERENCE: SSVR/126/Rev1

REPORT DATE: April 2026

STATEMENT OF INDEPENDENCE

Lornay Environmental Consultants nor any of the authors of this report have any material present or contingent interest in the outcome of this report, nor do they have any financial or other interest which may affect the independence of the author(s) or Lornay Environmental Consulting. The consultant fees paid to Lornay Environmental Consulting for the completion of this report is in line with standard professional fees and daily rates. The settling of the professional fee is not dependent on the outcome of the report.

DETAILS OF THE AUTHOR(S)

EAP ORGANISATION:	Lornay Environmental Consulting (Pty) Ltd
AUTHORS:	Michelle Naylor
	EAPASA. 2019/698
	Bachelor of Science (Hons); Master of Science (Rhodes University), EAPASA. 2019/698, SACNASP., IAIASA., cand. APHP
	Njabulo Magoswana
	EAPASA Cand, 2021/3178
	Bachelor of Science (Hons)

CONTENTS

1. INTRODUCTION

This Site Sensitivity Verification Report has been prepared to support the proposed development of a single residential dwelling and associated access road infrastructure on Portion 125 and Portion 126 of Farm No. 559, as well as the Remainder of Farm No. 562, located between Kleinmond and Betty's Bay area within the jurisdiction of the Overstrand Municipality. The development footprint falls within a largely natural and vegetated landscape, where the primary objective is to establish a single residential dwelling on Portion 126 of Farm No. 559. This includes the construction of an access road that will connect the proposed dwelling from the Clarence Drive via municipal land (RE/562). The current land use zoning for Portions 125 and 126 is "Undetermined," and the properties are currently undeveloped. The Remainder of the Farm 562 is current designated as "Open Space Zone 1". The subject properties (Portion 125 and 126 of the Farm No. 559) are currently undeveloped and are characterised by natural fynbos vegetation, contributing to the ecological sensitivity of the area. Additionally, Reminder of the Farm 562, a municipal land is located to the east and an access road that will be established to provide access to the proposed single residential dwelling will traverse this land.

This report serves to verify and ground-truth the environmental sensitivities identified by the National Web-based Environmental Screening Tool, assess the implications of the proposed development on the receiving environment, and provide guidance on the environmental management measures to be adopted in line with the relevant protocols under the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended.

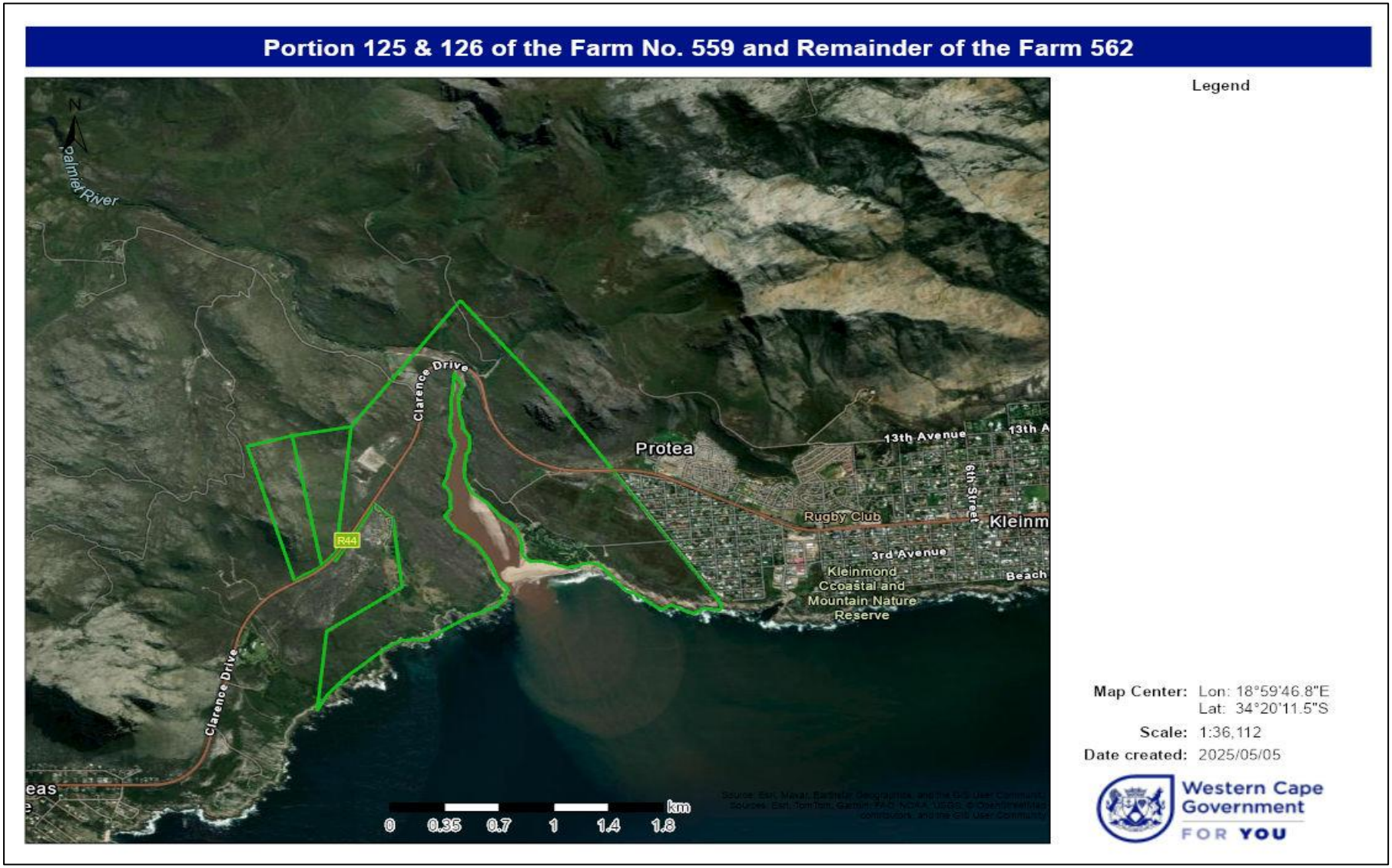

Figure 1. Location of subject properties.

2. PURPOSE OF THE REPORT

Lornay Environmental Consulting (Pty) Ltd, was appointment by Elephant Ventures Africa cc, to undertake the required process in terms of the National Environmental Management Act (Act 107 of 1998) and the Environmental impact Assessment (EIA) Regulations, 2014, as amended, for the proposed development.

As required in terms of the legislation, a Screening Tool Report was generated. The following specialist assessments were identified in the Screening Tool Report and recommended to be undertaken:

- 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

In accordance with the Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of NEMA, this Site Sensitivity Verification Report (SSVR) has been compiled to provide information and motivation for the specialist studies included and / or omitted as part of the environmental process.

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			

Agriculture Theme – Medium Sensitivity

The subject properties are located on land currently zoned as "undetermined." However, the proposed development is consistent with the land use rights afforded by the zoning scheme, specifically for the establishment of a single residential dwelling. No agricultural activities are currently being undertaken on-site, and the scale of the proposed development is not anticipated to compromise the agricultural potential of the broader area. No further assessment required.

Animal Species Theme – High Sensitivity

According to the National Web-Based Environmental Screening Tool, approximately ten animal species of conservation concern have been identified as potentially occurring within on the broader subject properties, Portions 125 and 126 of the Farm 599 and Remainder of the Farm 562, on the farm , with sensitivity ratings ranging from Medium to High. These include eight avian (birds) species, one amphibian species (*Cape platanna Xenopus gilli*), and one invertebrate species (the mountain grasshopper *Aneuryphymus montanus),* as detailed

in the table below. The proposed residential dwelling is situated on a previously disturbed quarry site in a disturbed habitat, and the associated development footprint is minimal. Nevertheless, a 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.

For the construction of the access road, a range of mitigation measures will be implemented, including a Search-and-Rescue protocol for plant and slow moving / sedentary faunal species in the development areas. The use of a jeep track is proposed to further limit the extent of habitat disturbance and road engineering. According to the Freshwater Specialist, following mitigation, the impact on fauna is anticipated to be of Low negative significance. Therefore, the development layout has been designed to avoid encroachment into wetland habitat areas. Construction zones will be clearly demarcated to prevent unintended disturbance beyond the designated footprint. Although the alignment of the access road lies within a few metres of a hillslope seep wetland, it is highly probable that any biota loss will be localised and limited in extent (i.e., of low intensity). All the mitigation measures regarding the fauna being proposed by the freshwater specialist will be implemented.

African marsh harrier (*Circus ranivorus)*

The African Marsh Harrier is listed as a species of High Sensitivity on the National Environmental Screening Tool, primarily due to its reliance on wetland and marshland habitats, which are increasingly under pressure from agricultural expansion, urbanisation, and infrastructure development. It is currently classified as Vulnerable in South Africa, largely due to habitat degradation and loss of suitable breeding and foraging grounds.

According to SANBI, (2015) this medium-sized species depend on permanent wetlands, both inland and coastal, occurs in marshes, reedbeds, vlei margins, floodplains, and occasionally along seasonally inundated grasslands. It also hunts over drier floodplains, grasslands, croplands, and Fynbos, where it preys mainly on small rodents (Simmons 2005), as well as birds, reptiles, frogs and insects (SANBI, 2015). It prefers wetland complexes with tall emergent vegetation, which provide cover for nesting and hunting. Their nests are usually placed in reedbeds over water, although breeding has been recorded in adjacent sedges, Fynbos, scrub and agricultural fields, but these are considered to be rare occurrences (SANBI, 2015).

Within the context of the proposed development on Portion 126 of Farm 559, the proximity of the proposed jeep track to the R44 may reduce the habitat suitability for this species, however a pre-construction site walk must be undertaken to survey for nests / presence of these birds.

Black Stork (*Ciconia nigra)*

This species can be typically found near water sources like pools, lakes, and estuaries, and in other marshy or wetland areas (Hockey, Dean and Ryan., 2005). It is particularly reliant on intact freshwater ecosystems and adjacent riparian vegetation. According to Hockey, Dean, and Ryan (2005), it primarily feeds on fish, foraging by wading through shallow water and striking at prey with its bill. Their nests are built and placed on a cliff ledge, pothole or cave, and sometimes on top of the old nest of a Hamerkop, Verreauxs' eagle or African harrier-hawk (Hockey, Dean and Ryan., 2005). The site proposed for the construction of main dwelling and the access road does not align with their preferred habitats, however a preconstruction site scan must be done by the appointed ECO / other responsible person. The scan should observe for the presence of both this species and their nests. Should any nests or breeding activity be identified within or near the proposed development footprint, immediate consultation with the ECO to determine the way forward. Construction must be halted in the vicinity of the nest, and a suitable buffer zone must be implemented to avoid disturbance.

Lanner Falcon (*Falco biarmicus*)

This species prefers open grasslands, cleared or open woodlands, and agricultural areas, as described by Hockey, Dean, and Ryan (2005). It generally favours habitats with good visibility for hunting prey, which includes birds such as doves, pigeons, and domestic chickens. According to Hockey, Dean, and Ryan (2005), it is most commonly

associated with cliffs used for nesting and roosting, although it may also utilise buildings, electricity pylons, and trees for these purposes. A site scan for these species must be undertaken prior to construction of the development however their preferred habitat choice does not align with where the construction and operations will take place on this property. The preferred habitat does not align with the proposed development area on site.

Striped Flufftail (*Sarothrura affinis)*

The Striped Flufftail (*Sarothrura affinis*) is a small, secretive bird with a patchy distribution across eastern and southern Africa. They are typically found in areas with dense cover near open areas for foraging areas, in the Western Cape it favours moist mountain fynbos with fountain-bush (*Psoralea*) and mountain daisies (*Osmitopsis*) while elsewhere it dry upland grassland with woody vegetation such as Protea, Oldwood (*Leucosidea sericea*) and sagewoods (*Buddle*ja) and sour grassland dominated by Red grass (*Themeda triandra*) (Hockey, Dean and Ryan., 2005). Given the presence of relatively intact vegetation cover on site, the area may offer suitable habitat for this species. A site scan for these species must be undertaken prior to construction of the development to prevent any of their habitat loss.

Verreaux's eagle (*Aquila verreauxii*)

According to SANBI, (2018) the Verttraux's eagle prefer mountainous, rocky terrain, especially areas with cliffs and ledges where hyraxes are abundant. Nests are typically built on cliffs or ledges, hilly mountains and caves (SANBI, 2018). Habitat preference does not align with development area on site.

Cape Platanna (*Xenopus gilli*)

According to SANBI, (2016) Cape Platanna is an endangered species found primarily in the Southwestern South Africa . It is found only in Cape fynbos heathland, is a winter breeder (July to October), and aestivates if waterbodies dry up (SANBI, 2016). Additionally, it is highlighted that it does not tolerate alteration of its habitat, and the larvae are very sensitive to changes in water quality. Due to the presence of waterbodies, such as wetlands near or adjacent to the site, the area could be a suitable habitat for this species. However, the site development layout has been designed to avoid and minimise encroachment into wetland areas. Moreover, it is important that a site scan must be undertaken prior to construction, and demarcation of the development site must be made in order to avoid the extent to areas outside the development footprint.

The Black Harrier (*Circus maurus*)

According to SANBI (2018) The Black Harrier is restricted to southern Africa, where it is mainly found in the fynbos and Karoo of the Western and Eastern Cape. Black Harriers prefer coastal and mountain fynbos, highland grasslands, Karoo sub-desert scrub, and open plains with low shrubs and croplands (SANBI, 2018). They breed close to coastal and upland marshes, damp sites, near vleis or streams with tall shrubs or reeds (SANBI, 2018). South-facing slopes are preferred in mountain areas where temperatures are cooler and vegetation is taller. During the non-breeding season they will also be found in dry grassland areas further north and they also visit coastal river floodplains in Namibia (SANBI, 2018). Due to the vegetation cover on site, which is still in a pristine state, there is a likelihood presence of this species type. Therefore, a site scan for Black Harrier nests must be conducted prior to construction. Should any nests be found, the proposed development must be postponed to a later date. Black Harriers, build their nests on the ground, in tall vegetation near wetlands or in reedbeds, using dried vegetation like stems, grass, reeds, and weeds.

Denham's bustard (*Neotis denhami*)

Denham's Bustard is a large terrestrial bird is usually encountered alone or in small groups of c. 2-7 birds although occasional aggregations as large as 28 individuals have been reported (SANBI, 2015). Its habitat use is known to vary seasonally, reflecting its adaptability to different environmental conditions (Allan, 2002). The species exhibits flexible foraging habits and distinctive breeding behaviour, often influenced by habitat structure

and human land-use patterns. In Western Cape, Denham's Bustard can be locally numerous in mosaics of cultivated pastures, agricultural croplands and natural vegetation with clear seasonal differences in the use of each habitat type (Allan 2002). A site scan for Denham's Bustard must be conducted prior to the commencement of construction activities.

Hottentot Buttonquail (*Turnix hottentottus*)

The Hottentot Buttonquail is mostly restricted to the Fynbos Biome in Western Cape (SANBI, 2015). It occurs from Cape Point (Table Mountain National Park), eastwards throughout the Cape Fold Mountains, with records from Hottentots Holland and adjacent ranges (e.g. near Somerset West, Kogelberg, Kleinmond and the Limietberg-Bain's Kloof areas; Taylor 2000b). It is also known from the Langeberg and Overberg regions (Bontebok National Park, De Hoop Nature Reserve, Potberg, Malgas and Wydgelee; Ryan and Hockey 1995). In the east of its range, it extends eastwards to the border of Eastern Cape along the Outeniqua, Kamanassie, Gamkasberg and Kouga ranges (Lee 2013). It was previously recorded as far east as Addo Elephant Park and Port Elizabeth, Eastern Cape (Grobler and Braack 1984) although there have been no recent records from this area (Allan and Colahan 1997). It also occurs in Strandveld along the West Coast, with occasional reports near Langebaan, and has been found breeding in Renosterveld near Melkbosstrand (Ryan and Hockey 1995).

A pre-construction site walk must be undertaken to detect any signs of the Hottentot Buttonquail, including calls, tracks and nesting evidence. If individuals are observed or habitat is confirmed to be suitable, mitigation measures such as timing construction activities outside the breeding season may need to be considered, however it is important to note that the development proposed is confirmed to the southern areas of the sites, alongside the R44 road, and therefore it is not expected that habitat for this species would be lost due to the proposed development.

Yellow-winged Agile Grasshopper (*Aneuryphymus montanus*)

The Yellow-winged Agile Grasshopper is a Vulnerable invertebrate species according to the IUCN Red List, primarily due to ongoing habitat loss and degradation, and a decline in the number of mature individuals (SANBI, 2018). According to SANBI, (2018) this species is endemic to parts of the Western Cape and is considered to be associated with fynbos vegetation, where it has been collected "amongst partly burnt stands of evergreen Sclerophyll in rocky foothills". It typically inhabits rocky foothill environments dominated by evergreen sclerophyllous vegetation, such as fynbos. According to Kinvig (2005), it appears to favour cooler, south-facing slopes. The species is generally flightless and has limited dispersal ability, which heightens its vulnerability to localised habitat disturbances.

The proposed development area falls within a region containing fynbos vegetation however the natural rocky terrain and slopes are further inland from the proposed development area. A pre-construction site survey must be conducted and if individuals are found within the proposed development footprint or immediate surroundings, a Search and Rescue operation must be initiated, with relocation to nearby suitable undisturbed habitat. Note Areas supporting rocky outcrops or south-facing slopes are further north on the submit property and not included in the development area discussed herein thereby reducing the overall risk to this species.

In conclusion, although there are 5 faunal species rated as high and 5 rated as low, for the property, the Screening Tool assessment was conducted for the entire property and not in the specific vicinity where the development is proposed. The development area has been historically disturbed by quarry activity and the road access route has been determined in conjunction with the botanist and wetland specialist to avoid sensitive areas. In addition, the road proposed will be low-key jeep track, and only used for domestic use, i.e there will not be high traffic traversing the property. The development areas are also confined to the southern areas on the properties, close to the busy R 44, which has already created impacts on the lower section so these properties. Given these factors, it is concluded that no further Faunal Assessment will be conducted beyond the recommendations for pre-construction mitigation above.

Sensitivity	Feature(s)
High	Aves-Circus ranivorus
High	Aves-Ciconia nigra
High	Aves-Falco biarmicus
High	Aves-Sarothrura affinis
High	Aves-Aquila verreauxii
Medium	Amphibia-Xenopus gilli
Medium	Aves-Circus maurus
Medium	Aves-Neotis denhami
Medium	Aves-Turnix hottentottus
Medium	Invertebrate-Aneuryphymus montanus

Aquatic Biodiversity Theme – Very High Sensitivity

The proposed single residential dwelling is situated on a historically disturbed quarry platform and lies more than 32m from the nearest delineated watercourses. A detailed aquatic biodiversity assessment confirmed the presence of a hillslope seep wetland and a channelled valley bottom wetland within the broader landscape. However, these wetland features will not be directly impacted by the residential footprint.

Notably, the construction of the proposed access road from Clarence Drive to Portion 126 will traverse Municipal land and pass in close proximity within a few metres to the hillslope seep wetland. Due to spatial constraints, it is not possible to align the access road in a manner that adheres to the recommended minimum 10m buffer from wetland habitat as stipulated by the Buffer Zone Guidelines (Macfarlane & Bredin, 2017). Given the proximity of the road to the wetland, the likelihood of disturbance to wetland habitat is considered Highly Probable. However, the extent of the impact is site-specific, limited to the hillslope seep wetland, and the duration is expected to be Short-Term, correlating with the construction phase of the road. As such, the overall impact significance is assessed to be Low (negative) in the absence of mitigation.

Archaeological and Cultural Heritage Impact Assessment – Low Sensitivity

The development proposed is not large scale, mitigation measures can be implemented for the construction phase in the unlikely event that finds are uncovered. Based on the scope of the development, it does not trigger the requirements set out under the National Heritage Resources Act (NHRA), which are described as below.

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.

Civil Aviation Theme – Low Sensitivity

The proposed development does not fall within any controlled civil aviation zones and is therefore not expected to interfere with aviation operations. No further assessment is required.

Defence Theme – Low Sensitivity

The subject properties do not fall within any designated military or defence zones. As such, no conflict with national defence interests is anticipated and no further investigation is required.

Palaeontology Theme – High Sensitivity

The development proposed is not large scale, mitigation measures can be implemented for the construction phase in the unlikely event that finds are uncovered. No further assessment required.

Plant Species Theme – High Sensitivity

This theme overlaps with the Terrestrial Biodiversity Theme. The site is generally in good ecological condition, with intact natural vegetation aside from a pre-existing access track. The vegetation comprises Hangklip Sand Fynbos, a Critically Endangered ecosystem type. Although plant Species of Conservation Concern (SCC) were identified elsewhere on the site, none were recorded within the quarry platform earmarked for development. The proposed dwelling and road extension have been strategically located to limit disturbance to sensitive areas. As a precautionary measure, a search and rescue operation will be conducted prior to construction to relocate any plants of conservation concern within the footprint.

Terrestrial Biodiversity Theme – Very High Sensitivity

The botanical assessment confirms that the vegetation on site is mapped as Kogelberg Sandstone Fynbos, which is a Critically Endangered vegetation type under the National Biodiversity Assessment 2018. The site is also included within a Critical Biodiversity Area (CBA1) in the Western Cape Biodiversity Spatial Plan. All of Portion 126 can be considered undisturbed and pristine with plant species of conservation concern identified, except for the two old gravel quarries, which have now naturally rehabilitated to some extent since being quarried some 10-15 years ago. The vegetation in the old quarries is a subset of what is present outside the quarries and is dominated by *Protea repens* and *Leucadendron laureolum*. No plant Species of Conservation Concern (SoCC) occur in the quarries.

CONCLUSION

The Site Sensitivity Verification Report has been compiled with input from a multidisciplinary specialist team, incorporating both terrestrial biodiversity and aquatic biodiversity assessments. The findings collectively confirm that the subject property is characterised by a high degree of ecological sensitivity, and that this sensitivity has been a primary determinant in the siting, design, and access route selection for the proposed development. The key conclusions arising from each specialist discipline are summarised below.

Terrestrial Biodiversity

(Nick Helme Botanical Surveys)

The vegetation on site is mapped as Kogelberg Sandstone Fynbos, a vegetation type classified as Critically Endangered under the National Biodiversity Assessment (NBA, 2018). The site falls within a Critical Biodiversity Area (CBA1) as designated in the Western Cape Biodiversity Spatial Plan, reflecting its significance within the regional conservation network and its role in maintaining ecological connectivity with the broader Kogelberg Biosphere Reserve.

The assessment confirmed that the entirety of Portion 126, with the exception of two previously worked gravel quarries, can be considered undisturbed and in a pristine condition. Numerous Plant Species of Conservation Concern (SoCC) were recorded across the property. The two old quarry areas, which are estimated to have been quarried approximately 10 to 15 years ago, have undergone a degree of natural rehabilitation and now support a subset of the vegetation communities present elsewhere on the site, dominated by *Protea repens* and *Leucadendron laureolum*. Importantly, no Plant Species of Conservation Concern were recorded within the quarry areas, which informed the identification of these previously disturbed areas as the most appropriate location for the proposed development footprint, in order to avoid impacts on intact and sensitive vegetation.

Aquatic Biodiversity

(EnviroSwift)

The aquatic assessment, based on vegetation communities, landscape position, and soil characteristics, confirmed the presence of the wetland features previously mapped for the site. Ground-truthing, however, refined the extent and classification of several features. Notably, the hillslope seep to the south-east of the site, in the vicinity of the proposed access route from Clarence Drive to the historic quarry, was determined to be less extensive than originally mapped. In addition, the portion of the mapped hillslope seep immediately east of the graveyard was reclassified as a channelled valley bottom wetland, representing a distinct and separately characterised aquatic feature.

Hillslope seep wetlands were also identified on either side of the existing access road to the graveyard. These features were not formally delineated as part of the assessment, as they were determined to be at no risk of impact as a result of the proposed development and its associated activities.

The aquatic assessment findings were instrumental in the comparative evaluation of access route alternatives. The preferred access route (Alternative 3; R44 opposite the WWTW) was confirmed to fall completely outside the delineated wetland boundary, avoiding direct wetland crossing. While sections of the route pass in proximity to the hillslope seep wetland, the overall impact significance was rated as Low (negative) prior to mitigation, with site-specific and short-duration disturbance expected during the construction phase only. With the application of recommended mitigation measures including clear demarcation of the construction footprint and the designation of No-Go zones residual impacts on aquatic features are expected to be minimal.