

INITIAL SITE SENSITIVITY VERIFICATION

1. SCOPE

The Initial Site Sensitivity Verification must be undertaken through the use of:

- (a) a desk top analysis, using satellite imagery; and
- (b) a preliminary on-site inspection to identify if there are any discrepancies with the current use of land and environmental status quo versus the environmental sensitivity as identified on the national web based environmental screening tool, such as new developments, infrastructure, indigenous/pristine vegetation, etc.

The outcome of the Initial Site Sensitivity Verification must be recorded in the form of a report that-

- (a) confirms or disputes the current use of the land and environmental sensitivity as identified by the national web based environmental screening tool;
- (b) contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity; and
- (c) is submitted together with the relevant reports prepared in accordance with the requirements of the Environmental Impact Assessment Regulations.

Desktop Analysis

- A review of readily-available plans, records and documents, including geotechnical information, to assist in determining past land uses and to identify potentially negative environmental conditions on site.
- An evaluation of aerial photographs if readily available, to assist in assessing historical land uses and conditions on and adjacent to the property.

On-site inspection

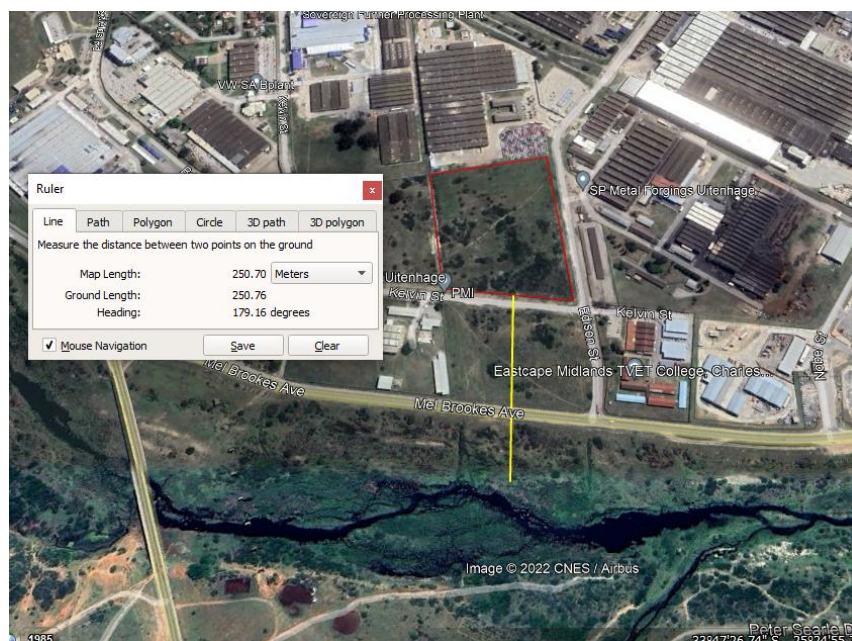
A visit and general characterization of the property, including a visual survey of the entire site. The property was visually inspected for: areas of vegetation; stained soils; impoundments; seeps; oil slicks or discoloration on surface waters; discernible chemical odours; above ground storage tanks; vertical pipes; leach fields and/or underground storage tanks; electrical transformers; and recent soil disturbances such as grading or filling. On 5 July 2018, the EAP from Eco Impact conducted an exploratory site visit to identify and document general observations and conditions associated with the Site.

2. SITE DESCRIPTION AND ADJOINING PROPERTIES

The Site is located at latitude 33°47'17.02"S and longitude 25°24'43.02"E, west of the current VWSA production facility in Uitenhage (Figure 1).



Sensitive receptors located within 1.5 km of the site include the Innes Laër and Albertyn Laër Kindergarten Schools and the Swartkops River.



The Site is zoned “Industrial”. The zoning certificate received confirms this. Approximately 37 411m of vacant undeveloped land lies to the south of the fence which runs from east to west and which essentially cuts the property in half. During an inspection of this area it was noted that extensive illegal dumping has occurred on site. A significant amount of rubble and building waste was observed throughout, but much of it was concentrated in certain areas. It is also possible that some of the waste that has been dumped on site has asbestos containing material. General waste and litter was also observed in large quantities. Evidence of human (fire and litter) and livestock disturbance was also evident. The property lies in the general area that supports Albany Alluvial Vegetation which is classified as endangered according to the new vegetation map of South Africa (Mucina & Rutherford 2006). As no botanical assessment of the site could be provided, it is unknown if any alien, invasive or endangered or protected species are present. During the site inspections some alien species such as *Acacia saligna*, commonly known as Port Jackson, were noted.

The Site is flat and the elevation of the Site ranges from approximately 34 to 36 meters (m) above mean sea level. On the undeveloped vacant portion of the property, on the western boundary, a trench is evident and runs from the fence line all the way to Kelvin Street. It seems as though the banks of the trench may have been created by the dumping of rubble and fill material. It is unclear if this trench may be considered a watercourse. The Swartkops River is situated approximately 200m to the south of the southern boundary of the Site. The river runs into the Swartkops Estuary.

Surroundings

The Site is bordered by a railway line to the north. Edison road is to the east. Erf 6820 is to the west and Newton road is to the south. The areas immediately surrounding the Site (in all directions) are industrial single and multi-tenant properties except for Erf 7382 which is vacant.

Erf	Description of current operations	Size (approx.)	Known environmental issues
Erf 6820	Cape of Good Hope Wool Combers (Pty) Ltd	110000m ²	None identified
Erf 17655	Goodyear SA (Pty)	240000m ²	None identified
Erf 29036	Unknown	40000m ²	None identified
Erf 8101	SP Metal Forgings (Pty) Ltd	100000m ²	None identified
Erf 7382	Vacant	20000m ²	None identified
Erf 7383	VW Learning Academy–Technical E Plant	10000m ²	None identified

Direction	Description
North	Railway line followed by Erf 29036 (industrial) followed by Erf 17655 - Goodyear SA (Pty) (industrial).
East	Edison Street followed by Erf 8101 - SP Metal Forgings Uitenhage (industrial).
South	Newton Road followed by Erf 7382 – undeveloped vacant land followed by Mel Brookes Ave followed by vacant open space with the Swartkops River flowing from west to east.
West	Erf 6820 - Cape of Good Hope Wool Combers (Pty) Ltd (industrial) followed by Kelvin Street.

3. “HISTORICAL USE” INFORMATION SOURCES

The only readily available aerial photographs in South Africa are available on Google Earth Pro. The following historical photographs were reviewed, and copies are included in **Appendix A**:

Aerial photographs for the years 2004, 2006, 2009, 2010, 2012, 2013, 2014, 2015, 2016, 2017.

Table 1: Historical Records Review

Year	Description
2004	The Site was including all five buildings and vacant land to the south. Football field evident.
2006	Addition of covered parking bays.
2009	No material change was apparent from the previous photograph.
2010	No material change was apparent from the previous photograph.
2012	No material change was apparent from the previous photograph.
2013	No material change was apparent from the previous photograph.
2014	No material change was apparent from the previous photograph.
2015	Football field no longer visible and seems indigenous vegetation has reestablished in this area.
2016	No material change was apparent from the previous photograph.
2017	No material change was apparent from the previous photograph.

4. THE PROTOCOLS

“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 the National Environmental Management Act, 1998, when applying for Environmental Authorisation” (“the Protocols”)

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Protocols may therefore be applicable to your proposed development. According to the Protocols, **before commencing with a specialist assessment**, the current use of the land and environmental sensitivity of the site under consideration identified by the screening tool must be confirmed by undertaking **site sensitivity verification**.

5. SPECIALIST ASSESSMENTS IDENTIFIED BASED ON THEME SENSITIVITY

Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, **the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.**

According to the screening tool - Environmental Sensitivity:

1. **Terrestrial biodiversity – Very High**
2. **Aquatic Biodiversity – Very High**
3. Agricultural – High
4. Animal Species – High
5. Civil Aviation – High
6. Paleontological – Medium
7. Plant species – Medium
8. Archaeological and Cultural – Low
9. Defence – Low

According to the screening tool - Specialist assessments identified:

1. **Terrestrial Biodiversity Impact Assessment (Very High)**
2. **Aquatic Biodiversity Impact Assessment (Very High)**
3. Animal Species Assessment (High)
4. Palaeontology Impact Assessment (Medium)
5. Plant Species Assessment (Medium)
6. Archaeological and Cultural Heritage Impact Assessment (LOW)
7. Socio-Economic Assessment (no score)
8. Landscape / Visual Impact Assessment (no score)

6. CONFIRM OR DISPUTE SENSITIVITY AS IDENTIFIED BY SCREENING TOOL

1. Terrestrial biodiversity – Very High
2. Aquatic Biodiversity – Very High
3. Agricultural – High
4. Animal Species – High
5. Civil Aviation – High
6. Paleontological – Medium
7. Plant species – Medium
8. Archaeological and Cultural – Low
9. Defence – Low
10. Socio-Economic Assessment - (no score)
11. Landscape / Visual Impact Assessment - (no score)

1. Terrestrial Biodiversity Impact Assessment (VERH HIGH according to screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
<p>Terrestrial Biodiversity Theme – very high sensitive</p> <ul style="list-style-type: none"> • Vulnerable ecosystem <p>1.1 An applicant intending to undertake an activity identified in the Scope of this Protocol, on a site identified as being of “very high sensitivity” for terrestrial biodiversity on the national web based environmental screening tool must submit a Terrestrial Biodiversity Impact Assessment.</p> <p>1.2 However, where the information gathered from the Initial Site Sensitivity Verification identified in section 2.1 of this Protocol or the specialist assessment differs from the designation of “very high” terrestrial biodiversity sensitivity from the national web based environmental screening tool and it is found to be of a “low” sensitivity, then a terrestrial biodiversity impact assessment is not required.</p> <p>1.3 Should paragraph 1.2 apply, a Terrestrial Biodiversity Compliance Statement is to be provided. An Environmental Assessment Practitioner or a suitably qualified and SACNASP registered specialist, must append to the Terrestrial Biodiversity Compliance Statement a motivation and evidence (e.g. photographs) of the changed Terrestrial Biodiversity sensitivity.</p>	<p>Dispute to low.</p> <p>It is recommended that a Terrestrial Biodiversity Compliance Statement be required.</p>	<p>Although the property lies in the general area that supports Albany Alluvial Vegetation which is classified as endangered according to the new vegetation map of South Africa (Mucina & Rutherford 2006). The site has been disturbed by previous activity prior to the applicant purchasing the property. During an inspection of this area it was noted that extensive illegal dumping has occurred on site. A significant amount of rubble and building waste was observed throughout the site but concentrated in certain areas. During the site inspections some alien species such as <i>Acacia saligna</i>, commonly known as Port Jackson, were noted.</p>

2. Aquatic Biodiversity Impact Assessment (VERY HIGH - according to screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
<p>Aquatic Biodiversity Theme – very high</p> <ul style="list-style-type: none"> Strategic water source area <p>Where the information gathered from the site sensitivity verification differs from the screening tool designation of “very high” aquatic biodiversity sensitivity, and it is found to be of a “low” sensitivity, an Aquatic Biodiversity Compliance Statement must be submitted.</p>	<p>Dispute to low.</p> <p>It is recommended that a Aquatic Biodiversity Compliance Statement be required.</p>	<p>On the undeveloped vacant portion of the property, on the western boundary, a trench is evident. It runs from the fence line all the way to Kelvin Street. See Photographs 29 and 30. It seems as though the banks of the trench may have been created by the dumping of rubble and fill material. It is unclear if this trench may be considered a water course which could restrict development options on the site and trigger further listed activities and the need for a Water Use License. In terms of the National Water Act a water course is defined as “a natural channel in which water flows regularly or intermittently”. Eco Impact is of the opinion that this channel is not natural and is due to dumping and the flow of stormwater. It is however recommended that prior to development, this is confirmed by a specialist.</p> <p>The reason for the VERY high score is due to the entire area being a strategic water source area rather than a water course on site.</p>

3. Animal Species Assessment (High – according to screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
<p>Animal Species Theme – High</p> <p>High</p> <ul style="list-style-type: none"> • Aves-Circus ranivorus <p>Medium</p> <ul style="list-style-type: none"> • Aves-Bradypterus sylvaticus • Aves-Neotis denhami • Aves-Afrotis afra • Mammalia-Chlorotalpa duthieae • Sensitive species 8 • Invertebrate-Aneuryphymus montanus <p>Where the information gathered from the site sensitivity verification differs from the screening tool designation of “very high” or “high”, for terrestrial animal species sensitivity and it is found to be of a “low” sensitivity, then a Terrestrial Animal Species Compliance Statement must be submitted.</p>	<p>Dispute to low.</p> <p>It is recommended that a Animal Species Compliance Statement be required.</p>	<p>No animal species were observed on site during the site inspection. The site has been disturbed by human activities and due to its surroundings of industrial properties it is anticipated that the proposed development will not have any significant impact on any populations of threatened animal species. See photographs in Appendix 2.</p>

4. No Study indicated but Agricultural theme (High – according to screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
<p>Agriculture Theme – High</p> <ul style="list-style-type: none"> • High- Land capability;09. Moderate-High/10. Moderate-High • Medium-Land capability;06. Low-Moderate/07. Low-Moderate/08. Moderate <p>where the information gathered from the Initial Site Sensitivity Verification differs from the designation of “high” sensitivity from the national web based environmental screening tool and it is found to be of a “low” sensitivity, then a Agricultural Compliance Statement is required.</p>	<p>Dispute theme. Confirm no study required.</p> <p>It is recommended that no Agricultural Compliance Statement be required as per the screening tool.</p>	<p>The Area 3.5ha in size. The ERF is an industrial site with existing industrial buildings.</p>

5. No study indicated but civil aviation (High civil aviation – according to screening tool)

Theme and sensitivity according to screening tool	Response
<p>Civil Aviation Theme – high</p> <p>High</p> <ul style="list-style-type: none"> • Within 8 km of other civil aviation aerodrome <p>Medium</p> <ul style="list-style-type: none"> • Between 15 and 35 km from a civil aviation radar • Between 15 and 35 km from a major civil aviation aerodrome 	<p>Although the site is located near the airport and hence has a high civil aviation theme, the proposed development itself rather than the site will have a low to no sensitivity or impact on civil aviation.</p> <p>The proposed development of a warehouse on an industrial erf will not impact civil aviation.</p>

6. Palaeontology Impact Assessment (MEDIUM sensitivity rating from screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
<p>Medium</p> <p>As no specific assessment protocol has been prescribed, the required level of assessment must be based on the findings of the Initial Site Sensitivity Verification and must comply with Appendix 6 of the Environmental Impact Assessment Regulations promulgated under sections 24(5) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (The Act), where a specialist assessment is required.</p>	<p>Dispute to low.</p> <p>It is recommended that no Palaeontology Impact Assessment or Compliance statement be required.</p>	<p>Are there no signs of culturally or historically significant elements, as defined in section 2 of the NHRA, including Archaeological or paleontological sites, on or close (within 20m) to the site. The erf is an industrial site with existing industrial buildings, the proposed development of a warehouse should not impact on palaeontology.</p>

7. Plant Species Assessment (Medium –according to screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
<p>Plant Species Theme – medium</p> <p>Medium</p> <ul style="list-style-type: none"> • Sensitive species 1252 • Sensitive species 1235 • Sensitive species 570 • Marsilea schelpeana • Syncarpha recurvata • Amphiglossa callunoides • Agathosma gonaquensis • Justicia orchioides subsp. Orchioides <p>Where the information gathered from the site sensitivity verification differs from the screening tool designation of “very high” or “high” for terrestrial plant species sensitivity on the screening tool, and it is found to be of a “low” sensitivity, then a Terrestrial Plant Species Compliance Statement must be submitted.</p>	<p>Dispute.</p> <p>A Terrestrial Plant Species Compliance Statement must be submitted.</p>	<p>Although the property lies in the general area that supports Albany Alluvial Vegetation which is classified as endangered according to the new vegetation map of South Africa (Mucina & Rutherford 2006). The site has been disturbed by previous activity prior to the applicant purchasing the property. During an inspection of this area it was noted that extensive illegal dumping has occurred on site. A significant amount of rubble and building waste was observed throughout the site but concentrated in certain areas. During the site inspections some alien species such as Acacia saligna, commonly known as Port Jackson, were noted.</p>

8. Archaeological and Cultural Heritage Impact Assessment (LOW sensitivity rating from screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
<p>Low</p> <p>As no specific assessment protocol has been prescribed, the required level of assessment must be based on the findings of the Initial Site Sensitivity Verification and must comply with Appendix 6 of the Environmental Impact Assessment Regulations promulgated under sections 24(5) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (The Act), where a specialist assessment is required.</p>	<p>Dispute.</p> <p>It is recommended that no Archaeological and Cultural Heritage Impact Assessment or Compliance statement be required.</p>	<p>Are there no signs of culturally or historically significant elements, as defined in section 2 of the NHRA, including Archaeological or paleontological sites, on or close (within 20m) to the site. The erf is an industrial site with existing industrial buildings, the proposed development for the warehouse should not impact on Archaeological and Cultural Heritage.</p>

9. No study indicated but defence themes (Low Defence theme – according to screening tool)

Theme and sensitivity according to screening tool	Response
Defence Theme – low	The proposed development of a warehouse on an industrial erf will not impact defence.

10. Socio-Economic Assessment (no theme or sensitivity rating from screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
<p>No sensitivity rating</p> <p>As no specific assessment protocol has been prescribed, the required level of assessment must be based on the findings of the Initial Site Sensitivity Verification and must comply with Appendix 6 of the Environmental Impact Assessment Regulations promulgated under sections 24(5) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (The Act), where a specialist assessment is required.</p>	<p>Dispute.</p> <p>It is recommended that no Socio-Economic Assessment or Compliance statement be required.</p>	<p>The erf is an industrial site with existing industrial buildings, the proposed development of an additional warehouse should not have significant social impacts. The site is currently vacant and as such the proposed development will result increased jobs in the areas.</p>

11. Landscape/Visual Assessment (no theme or sensitivity rating from screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
<p>No sensitivity rating</p> <p>As no specific assessment protocol has been prescribed, the required level of assessment must be based on the findings of the Initial Site Sensitivity Verification and must comply with Appendix 6 of the Environmental Impact Assessment Regulations promulgated under sections 24(5) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (The Act), where a specialist assessment is required.</p>	<p>Dispute.</p> <p>It is recommended that no visual Assessment or compliance statement be required.</p>	<p>The erf is an industrial site with existing industrial buildings, the proposed development for the additional warehouse should not have significant visual impacts.</p>