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 07 January 2020, the assessor from Eco Impact accompanied by a representative of ZEST 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°52'6.22"S and longitude 18°31'14.18"E (Figure 1.)

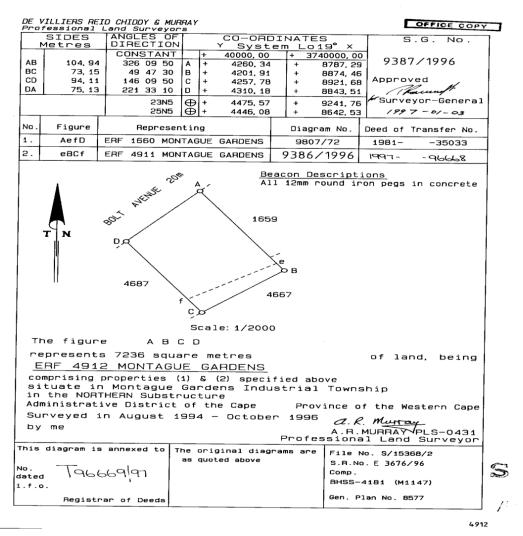


There appear to be no sensitive receptors located within 1.5 km (Figure 2) of the site. The nearest appears to be the Riet Vlei Wetlands which are some 2.5km distant.



The site consists of two erven, such being Erf 1660 and Erf 4911 which were consolidated into Erf 4912 of approximately 7236 sqm. See Figure 3.

Figure 3.



There is currently one main entrance to the site, situated on the north western side along Bolt Avenue. There is a further entrance to the site from the adjacent neighboring property on the southern side of the premises.

The site consists of two buildings which are linked by a covered walkway. The smaller of the buildings is a two-floor structure that comprises offices, ablutions and a small kitchenette. At the time of the site inspection it was found to be vacant. Damage was noted to the ceilings and electrical systems in the building, apparently as a result of historical illegal occupation by vagrants.

The larger second building is currently vacant and comprises two large warehouses, ablutions, electrical distribution and substation and some offices.

There is a cement paved area as you enter the property from the entrance on Bolt Avenue, which gives access via a tarred drive to the rear of the premises along the northeastern perimeter. There is a paved area that has sustained some damage on the southwestern side of the property, adjacent to the Eskom transformers, which are contained behind a locked fenced off area adjacent to the southwestern entrance to the property. There are no natural vegetation or formal gardens but a large open grassy area at the back of the site has some grass and alien invasive species.

It appears from the building plans that the buildings were constructed in 1991. Historical aerial photographs were not available pre-2000. It does not appear that much work was conducted to expand the site operations since 2000. This despite plans dated 1996, which show the transformation from a warehouse to a freezer and cold store. The extent of any changes can be viewed in the difference between the 2000 photograph and the 2019 photograph (Figures 4 and 5), respectively.





The site is currently owned by Accelerate Property Fund Limited. The erf was allotted through a "Deed of Transfer" by C-Max Investments 300 (Pty) Ltd to Accelerate Property Fund Limited in 2015.

The Zoning Scheme Extract dated 18 September 2014 provided by the Seller's agent reflects the zoning for Erf 4912. The site is in an industrial zone, currently zoned for "General Industry", sub-zone GI1, and is part of the Montague Gardens industrial area. The industrial area has a relative high-density rate due to its favourable location relative to road, rail and shipping access points.

Surroundings

The Site is bordered by two properties on the northeast and southwest sides. The northwestern side of the site is bordered by Bolt Avenue and a railway reserve borders the southeastern side. The details of the neighbours were not provided. Information obtained from Google Maps (2020) indicates the northeastern neighbour as Lusinco Electroplating cc. KotsoWorld (PTY) Ltd appears to be the neighbour on the southwestern boundary.

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 2000, 2002, 2009, 2010, 2013, 2015, 2016, 2018 and 2019.

Table 1: Historical Records Review

Year	Description
2000	First Historical Photograph
2002	No significant changes to the site
2009	No significant changes to the site
2010	No significant changes to the site. Noted what appears to have been some replacement of roof cladding on the northeastern section of the main building roof.
2013	No significant changes to the site.
2015	No significant changes to the site.
2016	No significant changes to the site.
2018	No significant changes to the site.
2019	No significant changes to the site.

In addition to plans that are dated 1991, the Seller's agent supplied plans apparently drawn up for "Spar" dated 16 September 1996. These plans detail extensive modifications to convert the warehouse to a freezer/cold store warehouse. As can be seen from the images, and as was verified from the site visit, this did not result in a significant change in the footprint of the existing original structures.

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")

Published on 20 March 2020 (Government Notice No. 320 as published in Government Gazette No. 43110 on 20 March 2020) and came into effect on 09 May 2020.

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. Further, a signed copy of the specific compliance statement for each applicable environmental theme must be appended to the Basic Assessment Report.

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:

- 1. Agricultural Impact Assessment
- 2. Archaeological and Cultural Heritage Impact Assessment
- 3. Palaeontology Impact Assessment
- 4. Terrestrial Biodiversity Impact Assessment
- 5. Aquatic Biodiversity Impact Assessment
- 6. Hydrology Assess
- 7. Noise Impact Assessment
- 8. Traffic Impact Assessment
- 9. Geotechnical Assessment
- 10. Socio-Economic Assessment
- 11. Plant Species Assessment
- 12. Animal Species Assessment

6. CONFIRM OR DISPUTE SENSITIVITY AS IDENTIFIED BY SCREENING TOOL

1. Agricultural Impact Assessment (Agriculture Theme – according to screening tool - medium)

Theme and sensitivity according to	Confirm or dispute	Motivation and evidence
screening tool		
Agriculture Theme – medium	Dispute.	The erf is Area 7234.2 square
		meters in size and is only
 Land capability; 06. Low- 	It is recommended that	1688 square meters of this is
Moderate/07. Low-	no Agricultural	not built on. The 1688
Moderate/08. Moderate	Compliance Statement	square meters is a small
	be required.	grassy area with scattered
An applicant intending to undertake an		alien invasive plants. The site
activity identified in the Scope of this		is an industrial site with
Protocol proposed on a site identified		existing industrial buildings
by the national web based		with no agricultural capacity.
environmental screening tool as being		Furthermore, no
of "medium" or "low" sensitivity for		neighbouring land is
agricultural resources must submit an		available for agriculture as
Agricultural Compliance Statement.		the site is in the centre of the
		Montague Gardens
		industrial area.

2. <u>Archaeological and Cultural Heritage Impact Assessment (no theme or sensitivity rating from screening tool)</u>

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

3. Palaeontology Impact Assessment (no theme or sensitivity rating from screening tool)

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

4. <u>Terrestrial Biodiversity Impact Assessment</u> (<u>Terrestrial Biodiversity Theme – according to screening tool - very high sensitive</u>)

Theme and sensitivity according to	Confirm or dispute	Motivation and evidence
screening tool		
Terrestrial Biodiversity Theme – very	Dispute.	The erf is Area 7234.2 square
high sensitive		meters in size and is only
	It is recommended that	1688 square meters of this is
Critically endangered	no Terrestrial	not built on. The 1688
ecosystem	Biodiversity Impact	square meters is a small
	Assessment be required.	grassy area with scattered
1.1 An applicant intending to undertake		alien invasive plants. See
an activity identified in the Scope of this	It is also recommended	Appendix 2. Furthermore, no
Protocol, on a site identified as being of	that no Terrestrial	neighbouring land contains
"very high sensitivity" for terrestrial	Biodiversity Compliance	natural vegetation and the
biodiversity on the national web based	Statement be required.	area is not considered an
environmental screening tool must		ecological support area or
submit a Terrestrial Biodiversity Impact		natural area. The industrial
Assessment.		site only has grass and some
1.2 However, where the information		alien invasive species
gathered from the Initial Site Sensitivity		present. Although the area
Verification identified in section 2.1 of this Protocol or the specialist		was historically Cape Flats Sand Fynbos, the industrial
this Protocol or the specialist assessment differs from the		area was transformed and
designation of "very high" terrestrial		built up many years ago. See
biodiversity sensitivity from the		Appendix 1 and 2.
national web based environmental		Appendix 1 dild 2.
screening tool and it is found to be of a		
"low" sensitivity, then a terrestrial		
biodiversity impact assessment is not		
required.		
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.		

5. <u>Aquatic Biodiversity Impact Assessment</u> (<u>Aquatic Biodiversity Theme - according to screening tool – low)</u>

Theme and sensitivity according to	Confirm or dispute	Motivation and evidence
screening tool		
Aquatic Biodiversity Theme – low	Dispute.	There are no watercourses
		on site.
An applicant, intending to undertake an	It is recommended that	
activity identified in the Scope of this	no Aquatic Biodiversity	There appear to be no
Protocol, on a site identified as being of	Impact Assessment or	sensitive receptors located
"low sensitivity" for aquatic biodiversity	Aquatic Biodiversity	within 1.5 km (Figure 2) of
on the national web based	Compliance Statement	the site. The nearest appears
environmental screening tool must	be required.	to be the Riet Vlei Wetlands
submit an Aquatic Biodiversity		which are some 2.5km
Compliance Statement to the		distant.
competent authority.		

6. Hydrology Assessment (no theme or sensitivity rating from screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
No sensitivity rating	Dispute.	There are no watercourses on site.
As no specific assessment protocol has	It is recommended that	
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.	no Hydrology Assessment be required.	There appear to be no sensitive receptors located within 1.5 km (Figure 2) of the site. The nearest appears to be the Riet Vlei Wetlands which are some 2.5km distant.

7. Noise Impact Assessment (no theme or sensitivity rating from screening tool)

Theme and sensitivity	Confirm or dispute	Protocol for the assessment and	
according to screening tool		reporting of noise impacts	
No sensitivity rating	Confirm.	The Noise Assessment	
		2.1 The assessment must be undertaken	
1.1 An applicant intending to	Given the fact that	t by a suitably qualified noise specialist on	
undertake an activity	there are residential	the	
identified in the Scope of this	areas in close proximity	site being submitted as the preferred	
Protocol for a site identified	from the proposed Zest	development site.	
by the national web based	Polyurethanes factory	2.2 The assessment must be undertaken	
environmental screening tool	as well, the following	based on a site inspection as well as	
as being of "very high",	residential areas are in	applying	
"high" or "medium"	question:	the noise standards and methodologies	
		stipulated in SANS 10103:2008 and SANS	

- sensitivity for noise must submit a Noise Assessment.
- 1.2 Where the information gathered from the Initial Site Sensitivity Verification contemplated in section 2.1 of this Protocol or the specialist assessment differs from the designation of "very high", "high" or "medium" sensitivity from the national web based environmental screening tool and it is found to be of a "low" sensitivity a Noise Assessment is not required.
- 1.3 Should 1.2 apply, a Noise Compliance Statement is to be provided. An Environmental Assessment Practitioner or a noise specialist, must append to Noise Compliance Statement a motivation and evidence (e.g. photographs of no buildings near the proposed development footprint) of the different noise sensitivity.

- i. The Bothasig residential area is 707m away, and
- ii. The Joe Slovo Park area is 824m away.
- It is therefore required that a Noise Impact Assessment is required to ensure that the Provincial Noise Control Regulations
- PN200/2013 are not violated.

- 10328:2008 for residential and non-residential areas as defined in these standards.
- 2.3 A baseline description must be provided of the potential receptors and existing
- ambient noise levels. As a minimum, this description must include the following:
- a. Current ambient sound levels recorded at relevant locations (e.g. receptors
- and proposed new noise sources) over a minimum of two nights and that provide a representative measurement of the ambient noise climate, with each sample being a minimum of ten minutes, and the approximate wind speed at the time of the measurement must be recorded.
- b. Mapped distance of the receiver from the proposed development that is the noise source.
- c. Calculation of noise impact from the noise source.
- 2.4 Assessment of impacts done in accordance to SANS 10103:2008 and SANS
- 10328:2008 including the following aspects which must be considered as a minimum in the predicted impact of the proposed development:
- a. Projected changes in noise levels as a result of the construction, operation and decommissioning of the development to the nearest receptors using
- industry accepted models and forecasts.

 3 The findings of the Noise Assessment must be written up in a Noise Report.

The Noise Assessment

- 2.1 The assessment must be undertaken by a suitably qualified noise specialist on the site being submitted as the preferred development site.
- 2.2 The assessment must be undertaken based on a site inspection as well as applying the noise standards and methodologies stipulated in SANS 10103:2008 and SANS

10328:2008 for residential and nonresidential areas as defined in these standards. 2.3 A baseline description must be provided of the potential receptors and existing ambient noise levels. As a minimum, this description must include the following: Current ambient sound levels recorded at relevant locations (e.g. receptors and proposed new noise sources) over a minimum of two nights and that provide a representative measurement of the ambient noise climate, with each sample being a minimum of ten minutes, and the approximate wind speed at the time of the measurement must be recorded. b. Mapped distance of the receiver from the proposed development that is the noise source. c. Calculation of noise impact from the noise source. 2.4 Assessment of impacts done in accordance to SANS 10103:2008 and **SANS** 10328:2008 including the following aspects which must be considered as a minimum in the predicted impact of the proposed development: a. Projected changes in noise levels as a result of the construction, operation and decommissioning of development to the nearest receptors using industry accepted models and forecasts. 3 The findings of the Noise Assessment must be written up in a Noise Report.

8. Traffic Impact Assessment (no theme or sensitivity rating from screening tool)

Theme and sensitivity according to	Confirm or dispute	Motivation and evidence
screening tool		
No sensitivity rating	Dispute.	It is not anticipated that that
		the proposed development
As no specific assessment protocol has	It is not recommended	will have a significant impact
been prescribed, the required level of	that a TIA be necessary.	on traffic as the number of
assessment must be based on the		additional trips generated
findings of the Initial Site Sensitivity		will not be significant.
Verification and must comply with		
Appendix 6 of the Environmental		

Impact Assessment Regulations	Increase in traffic (low
promulgated under sections 24(5) and	impact before mitigation
44 of the National Environmental	and low impact with
Management Act, 1998 (Act No. 107 of	mitigation measures);
1998) (The Act), where a specialist	
assessment is required.	

9. Geotechnical Assessment (no theme or sensitivity rating from screening tool)

Theme and sensitivity according to screening tool	Confirm or dispute	Notes on the specialist study
No sensitivity rating	Confirm.	The Geohydrological study must include but not limited to
As no specific assessment protocol		the following:
has been prescribed, the required		A full description of the
level of assessment must be based on		geology/subsurface
the findings of the Initial Site		A full geohydrology
Sensitivity Verification and must		description (aquifer
comply with Appendix 6 of the		classification, aquifer
Environmental Impact Assessment		vulnerability, recharge
Regulations promulgated under		characterization/quantification,
sections 24(5) and 44 of the National		current groundwater quality);
Environmental Management Act,		Borehole hydrocensus within
1998 (Act No. 107 of 1998) (The Act),		a 300m radius of the site must
where a specialist assessment is required.		be carried in order to
required.		determine potential recipients of groundwater contamination
		around development.
		Contaminant Risk assessment
		(with description of potential
		pollutants);
		Waste water management
		plan (inclusive of a water
		balance);
		• Groundwater Quality
		Monitoring Plan.

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
No sensitivity rating	Dispute.	The site is an industrial site with existing industrial
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		buildings, the proposed development for the storage of dangerous goods should not have significant social impacts. The site is currently vacant and as such the proposed development will

promulgated under sections 24(5) and	result increased jobs in the
44 of the National Environmental	areas.
Management Act, 1998 (Act No. 107 of	
1998) (The Act), where a specialist	
assessment is required.	

11. Plant Species Assessment (Plant Species Theme –according to screening tool – medium)

Theme and sensitivity according to	Confirm or dispute	Motivation and evidence
screening tool		
Plant Species Theme – medium	Dispute.	Grass and some alien invasive species present. See
• 111 medium sensitivity plant species listed	It is recommended that no Plant Species Assessment be required.	photographs in Appendix 2 showing that the site does not contain such sensitive
As no specific assessment protocol has been prescribed, the required level of		plant species as listed in the screening tool report.
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.		Although the area was historically Cape Flats Sand Fynbos, the industrial area was transformed and built up many years ago. The erf is Area 7234.2 square meters in size and is only 1688 square meters of this is not built on. The 1688 square meters is a small grassy area
		with scattered alien invasive plants. Furthermore, no neighbouring land contains natural vegetation and the area is not considered an ecological support area or natural area.

12. Animal Species Assessment (Animal Species Theme – according to screening tool – medium)

Theme and sensitivity according to screening tool	Confirm or dispute	Motivation and evidence
Animal Species Theme – medium	Dispute.	The proposed development will not have any significant
 Insecta-Torynesis mintha piquetbergensis Sensitive species 2 Sensitive species 7 	It is recommended that no Socio-Economic Assessment be required.	impact on any populations of threatened plant or animal species.
 Insecta-Aloeides egerides Insecta-Kedestes lenis lenis 		Although the area was historically Cape Flats Sand Fynbos, the industrial area was transformed and built

As no specific assessment protocol has up many years ago. The erf is been prescribed, the required level of Area 7234.2 square meters assessment must be based on the in size and is only 1688 findings of the Initial Site Sensitivity square meters of this is not Verification and must comply with built on. The 1688 square Appendix 6 of the Environmental meters is a small grassy area with scattered alien invasive **Impact** Assessment Regulations promulgated under sections 24(5) and plants. Furthermore, no 44 of the National Environmental neighbouring land contains Management Act, 1998 (Act No. 107 of natural vegetation and the 1998) (The Act), where a specialist area is not considered an assessment is required. ecological support area or natural area. See photographs in Appendix 2.

13. No study indicated but a note on civil aviation and defence themes (Civil aviation theme – according to screening tool – high and Defence theme – according to screening tool – medium)

Theme and sensitivity according to screening tool	Response	
 Civil Aviation Theme – high High - Within 15 km of a civil aviation radar High - Between 8 and 15 km from a major civil aviation aerodrome Medium - Within 5 km of an air traffic control or navigation site Medium - Between 8 and 15 km of other civil aviation aerodrome 	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. The proposed development for the storage of dangerous goods and the operation of a manufacturing site on an industrial erf will	
Defence Theme – medium	not impact civil aviation. The proposed development for the storage of dangerous goods and the operation of a manufacturing site on an industrial erf will not impact defence.	

APPENDIX 1: Historical Use Photographs







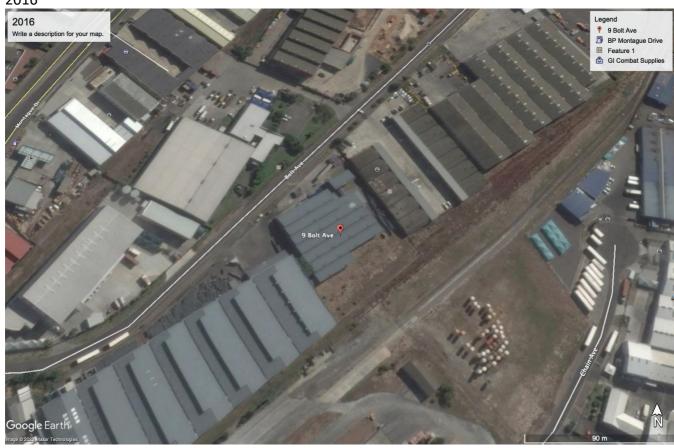










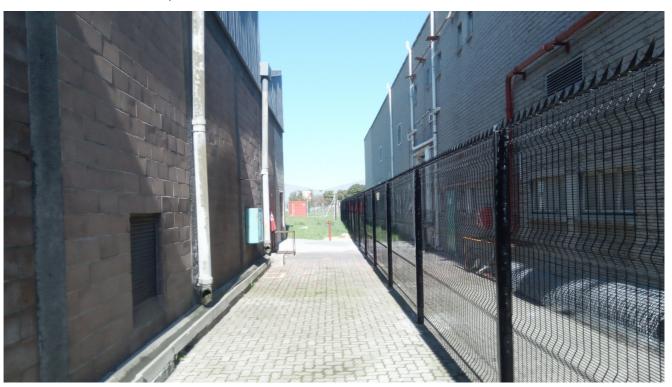






APPENDIX 2: Site Photographs as recorded during the site visit on 07 January 2020

Pic 1: Southern boundary.



Pic 2: Southern entrance looking north.



Pic 3: Boundary line running east west. Note alien invasive vegetation.



Pic 4: East West boundary looking West.



Pic 5: Access area between main warehouse and office building, looking west.



Pic 6: Covered walkway joining office block with warehouse, looking south.



Pic 7: Main warehouse looking south. Note inclined loading bay.



Pic 8: Office building looking from Bolt Avenue in an easterly direction.



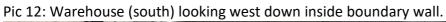
Pic 9: "Rear" of the warehouse looking in a south westerly direction.





Pic 11: Warehouse (northern) looking west at loading bay doors.







Pic 13: Bolt Avenue boundary fence showing proposed new entrance from Bolt Avenue. Note stormwater drain.



Pic 14: Eskom Transformer. Note site plan indicates this is on a separate "Erf".



Pic 15: Open area on South Eastern side of the site, adjacent to railway line. Note weeds and alien vegetation.

