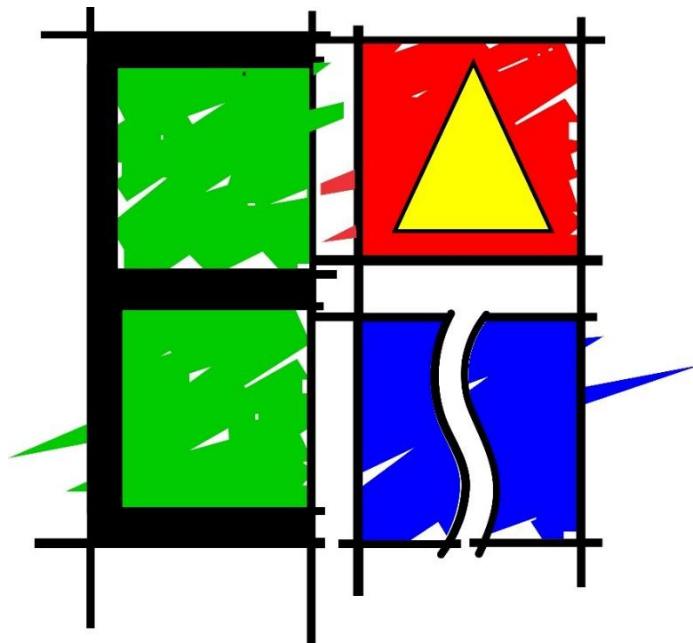

SITE SENSITIVITY VERIFICATION REPORT

PROPOSED DEVELOPMENT OF ERVEN 984 AND 1134,
PARSONS VLEI EXT 10 FOR STORAGE WAREHOUSING AND
RELATED FACILITIES



Report Prepared by:
Engineering Advice & Services (Pty) Ltd

Report Prepared for:
Lurco Trading 128 (Pty) Ltd

September 2025

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SITE SENSITIVITY VERIFICATION REPORT

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Our Ref: F:\2400-2499\2420\Environmental\Reports\BAR Report\Application\2420-Appendix 18 – Site Sensitivity Verification Report		

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INTRODUCTION & BACKGROUND

Lurco Trading 128 (Pty) Ltd has appointed Engineering Advice and Services (EAS) to apply for environmental authorisation to develop Erfen 984 and 1134 Parsons Vlei, situated south of Old Cape Road, Ward 12 of Nelson Mandela Bay Municipality (**Figure 1**). Lurco Trading 128 (Pty) Ltd is the registered owner of both properties, which are currently vacant. The applicant intends to develop Erf 984 Parsons Vlei, which is approximately 7.29 Ha, in line with its zoning permitted use, which is Industrial 1. Erf 1134 (± 3.31 ha) is earmarked for future development and will be submitted for environmental authorisation at this stage based on its current approved zoning, which includes Business Zone 1, Open Space Zone 2, Open Space Zone 3, and Transport Zone 2.

Project Location

The properties are situated approximately 600 meters apart. They are located in the south-western corner of the Parsons Vlei Allotment Area, north of Hunters Retreat. Parsons Vlei is part of the Western Suburbs of Port Elizabeth, and south of Cape Road. The subject sites are situated approximately 15 km away from Port Elizabeth City Centre, but well within the Urban Growth boundary (NMBM, 2011). In the local context in relation to the surrounding Allotment Areas, Hunters Retreat is located to the southeast, Greenbushes is located to the west of the site, and the Farms PE Allotment Area is located to the southwest. Erf 984 is along Reserve Road, and Erf 1134 can be accessed via Romulus Crescent, as indicated below, but neither has direct access via Cape Road.

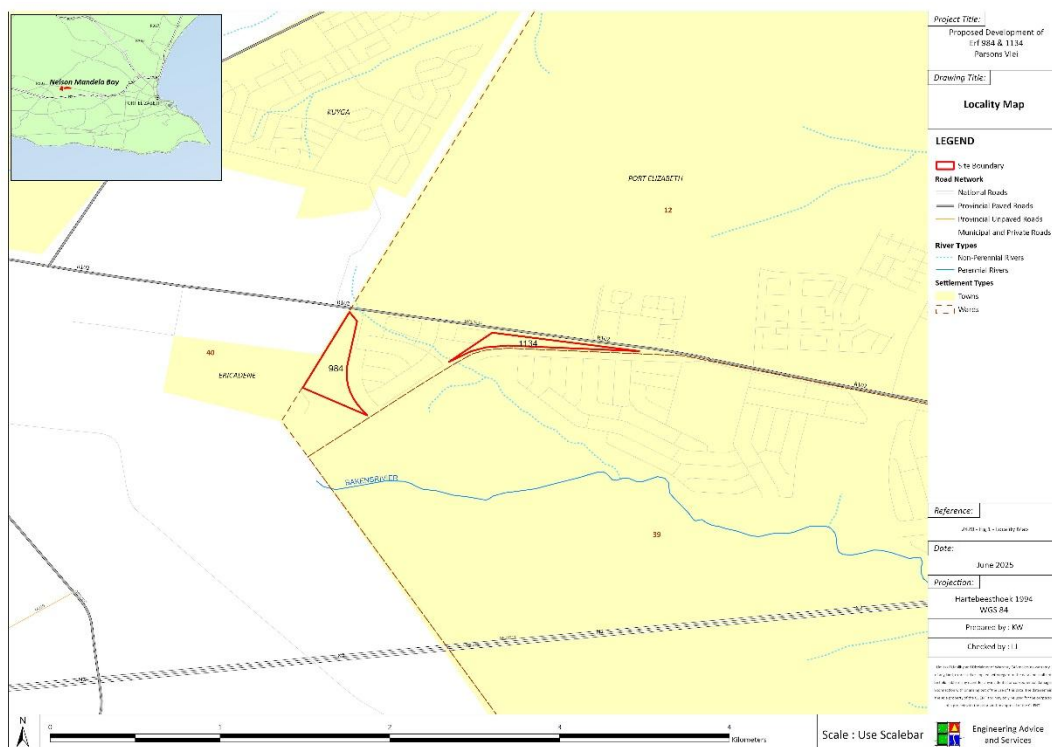


Figure 1. Locality Map

Background

The properties are located in the south-western corner of the Parsonsvei Allotment Area, north of Hunters Retreat. Parsonsvei is part of the Western Suburbs of Port Elizabeth. The subject sites are situated south of Cape Road, approximately 15 km away from Port Elizabeth City Centre, but well within the Urban Growth boundary (NMBM, 2011).

Erf 984, Parsons Vlei Ext 10

The proposed site Erf 984 is a vacant, relatively flat erf. It is abutted by fully functional residential dwellings along Reserve Road, east of the site. Light industries such as storage facilities, transport warehouses, etc., are located further west and north west within the Greenbushes allotment area. The site layout makes provisions for the development of warehouses and is zoned Industrial 1. Uses permitted in this zone are Funeral Parlours, Industries, Business Purposes, Public Garages, Parking, Warehousing, Shops, Workshops, Builder's Yards, and Noxious Uses subject to regulation 3.15.2 of the Port Elizabeth Zoning Scheme. **No noxious uses are planned or will take place.**

The proposed development may entail the construction of facilities such as:

- Warehouses which include inbound and outbound operational areas
- Changing rooms and ablutions
- Canteen and warehouse offices
- Yard areas on each site of the warehouse
- A return and repack store
- A truck wash bay, guardhouse, fire tank and pump house, refuse area, workshop,
- Parking in terms vehicle bays and truck bays
- An office block with reception, waiting and meeting rooms and offices
- Entrance/exit
- Guardhouse, refuse area, entrance/exit
- Yard areas to north, east and south of warehouse

No areas of high sensitivity were identified in the Biodiversity Specialist Report, and no areas have been recommended to be retained, but a section of medium sensitivity vegetation was identified within the southernmost portion of the site. Refer to the biodiversity section for further discussion.

Erf 1134, Parsonsvei

Erf 1134 is currently vacant. The erf is abutted by fully functional residential properties along Deon Street to the south and to the west along Romulus Crescent. Light industries such as storage facilities, transport warehouses, etc., are located further west and north west within the Greenbushes allotment area.

The applicant proposes the future development of Erf 1134. The erf measures approximately 3.31 hectares and is currently zoned as Business Zone 1, Open Space Zone 2, Open Space Zone 3, and Transport Zone 2, in accordance with municipal approvals granted in January 2025. Additionally, Erf 1134 was subdivided into eight land units. The applicant proposes to develop Erf 1134 in the future development within the confines of the land use rights, while retaining the open space area in the western corner. The south-western part of Erf 1134 will be retained as Open Space Zone 3 since that section is within a CBA according to the NMBM Bioregional Plan Status (2015).

This layout represents the current proposal being submitted for environmental authorisation. However, as the erf will only be developed at a later stage, a final site development plan will be submitted for approval if it differs from what is currently proposed.

Proposed Activities

The proposed development entails the following activities:

- ✓ Clearing of vegetation from the proposed sites for development
- ✓ Levelling and landscaping the sites for roads, buildings, and on-site parking
- ✓ Construction of roads to provide access to the plots
- ✓ Construction of services and integration into present network
- ✓ Construction of warehouses, storage facilities and related services
- ✓ Construction of a guardhouse/s to assist with access control
- ✓ Construction and installation of fencing and walls to separate plots and assist with the implementation of safety measures
- ✓ Establishment of some open space

Specialist assessments which have been undertaken for this project include:

- **Terrestrial Biodiversity Impact Assessment** – A specialist report was conducted by Mr Jamie Pote in August 2020 and was reviewed in July 2025 by Mr Jamie Pote (Botanical Specialist). The review findings of July 2025 were consistent with the findings of August 2020.

NEED AND DESIRABILITY

The proposed project sites are situated along the Old Cape Road on the Western outskirts of the Nelson Mandela Bay Metro. The sites are well linked to the greater metropolitan area, with major transportation routes being the connection. The Old Cape Roads links to the N2 freeway via Seaview Road; other prominent roads include Diaz Arterial, Walker Drive, Kragga Kamma Road, and Kabega Road. These roads also provide important internal circulation functions within the Western Suburbs Local Spatial Development Framework/WSLSDF. The viewpoint is that the connection within and to Western outskirts is characterised by the envisioned upgrading plans of the NMBM to properly plan and service nearby residential areas. Intensification of mixed-use developments around the urban nodes and major transportation routes in the immediate vicinity is encouraged (MSDF, 2015)

The two sites are less than a kilometre away from the industrial Green Bushes. Erf 984, Parsonsvelei, will provide an ideal service for the industrial Green Bushes. The Rent-A-Store warehousing also proves that the proposed development in Erf 984 joins the fabric of land uses. Warehousing is an essential component in the logistics and industrial sectors. The site is positioned well in view of the surrounding areas and projected development facilities, including current and prospective developments.

The desirability for mixed-use development, in residential areas, is intended for convenience by shortening travel distances for needs and wants. The development proposed for Erf 1134 is favourable in residential areas as it provides a mixed-use of developments through the ability to blend retail, leisure, and entertainment, and residential living space together, creating an all-in-one space that's built for convenience. These services are an essential combination for the economy and its citizens.

The connectivity of the sites to other businesses and industries offers significant retail and commercial use to residents of the Western suburbs and road users of Metropolitan Nodes. The municipality and its residents are benefiting economically from the movement of activities along this route.

THE ONLINE DFFE SCREENING TOOL

On 20 March 2020, the Minister of Forestry, Fisheries and the Environment published the general requirements for undertaking site sensitivity verification for environmental themes for activities requiring environmental authorisation (Government Gazette No. 43110). In terms of these requirements, prior to commencing with a specialist assessment, the current land use and environmental sensitivity of the site under consideration by the screening tool must be confirmed by undertaking a site sensitivity verification (DEDEAT).

In accordance with the Notice of the requirement to submit a report generated by the national web-based environmental screening tool in terms of section 24(5)(h) of the NEMA, 1998 (Act No 107 of 1998) and regulation 16(1)(b)(v) of the EIA regulations, 2014, as amended, a screening tool was generated and identified specific site sensitivities and themes to be assessed for this specific project. The following specialist themes were identified:

Site Sensitivities identified (Screening Tool)

Category	Screening Tool Sensitivity	
	Erf 1134	Erf 984
Agriculture Theme	High	High
Animal Species Theme	High	High
Aquatic Biodiversity Theme	Very High	Very High
Archaeological and Cultural Heritage Theme	Low	Low
Civil Aviation Theme	High	High
Defense Theme	Medium	Medium
Paleontology Theme	High	High
Plant Species Theme	Medium	Medium
Terrestrial Biodiversity Theme	Very High	Very High

Specialist assessments identified

Based on the above environmental sensitivities, as well as initial site investigations for the proposed development footprint, the following list of specialist assessments has been identified for inclusion in the assessment report by the screening tool.

1. Landscape/Visual Impact Assessment
2. Archaeological and Cultural Heritage Impact Assessment
3. Paleontology Impact Assessment
4. Terrestrial Biodiversity Impact Assessment
5. Aquatic Biodiversity Impact Assessment
6. Avian Impact Assessment
7. Socio-Economic Assessment
8. Plant Species Assessment
9. Animal Species Assessment

Therefore, this site sensitivity verification report is compiled to determine whether Specialist Assessments or Compliance Statements for the abovementioned specialist studies are required for the proposed development.

Site Sensitivity Verification Methodology

The site sensitivity verification report compiled by Engineering Advice and Services (represented by Mr. Kurt Wicht) is based on:

- A site investigation was undertaken on 31 June 2025.
- A desktop investigation using biodiversity and land-use mapping tools such as inter alia ArcGIS and;
- Information recorded in the Screening Report
- Information derived from available specialist assessment reports.

DESKTOP ANALYSIS OF SITE

The proposed development sites are located in Parsonsvei on the western outskirts of Gqeberha on the western portion of Algoa Bay along the south-eastern coast of South Africa. Gqeberha receives an average annual rainfall of 453 mm, with rainfall occurring throughout the year, where the lowest rainfall occurs in January and the greatest in October (meteoblue.com).

Table 1. Descriptions and implications of possible natural features

Feature	Description	Implication
Vegetation Unit (NBA, 2018)	Algoa Sandstone Fynbos	Critically Endangered
Critically Endangered and Endangered ecosystems (NEMBA, 2004)	Algoa Sandstone Fynbos	Critically Endangered
Vulnerable ecosystems	Rowallan Park Grassy Fynbos	Vulnerable
Affected Vegetation Types (Regional)	Rowallan Park Grassy Fynbos	The vegetation type is Vulnerable, the vegetation on site is confirmed to be primarily secondary in nature and not of the vegetation type indicated. Highly invaded. A small remnant, degraded portion is present along the southern boundary of Erf 984
Water Features	A small unchanneled valley-bottom wetland and non-perennial rivers are located south-west of Erf 1134, Parsonsvei.	None affected, since the one section situated close to the drainage line will be a private open space.
Protected areas	None affected	N/A
Protected area buffers (5 km)	None	N/A

A screening of the Nelson Mandela Bay Bioregional Plan indicated the following Critical Biodiversity Areas as being present:

Table 2. Critical Biodiversity Areas (NMB BP, 2015)

Feature	Description	Implication
Critical Biodiversity Areas (Nelson Mandela Bay Bioregional Plan)	CBA	The south west corner of Erf, 1134 Parsonsvei, is identified in the gazetted NMB Bioregional Plan as a Critical Biodiversity Area. This area will be left as Open Space

DISCUSSION OF IDENTIFIED SPECIALIST ASSESSMENTS

1. Landscape/Visual Impact Assessment

The subject sites are vacant. The surrounding land uses are mixed with residential dwellings adjacent to both erven and light industrial activities further west and north west in the Greenbushes allotment area. They are located in an area experiencing increasing urban development, with both erven surrounded by land currently being developed to the north, east, and west.

The visual impact shift from vacant land to warehousing is expected – it is important to note that there is disturbance to the sites (e.g. paths and footpaths, litter and alien invasives) which limit their current visual appeal. The proposed development amalgamates with the light industries that are in its vicinity, including the site's neighbours, like Rent a Store Warehousing and other warehousing to the west of the sites

It has been concluded that the proposed development activities align with future WSLSDF development, and the proposed locations will not have a major visual impact. **The proposed project should not require a formal Landscape/visual Impact Assessment or the compilation of a compliance statement.**

2. Archaeological and Cultural Heritage Impact Assessment

There are no visible structures or remnants of structures located on either of the sites. Previously, prior to the last authorisation, a letter of recommendation (with conditions) for the exemption of a full phase 1 Archaeological Impact Assessment (AIA) for the proposed development of Erven 984 and 1134, Parsonsvelei, was conducted by Eastern Cape Heritage Consultants cc. However, recently, the competent authority has required that a full phase 1 AIA be conducted for most sites. **The full phase 1 AIA will be conducted prior to construction.**

3. Paleontology Impact Assessment

The sites have been classified as having a high paleontological sensitivity by the DFFE online screening tool. Impacts on paleontological resources may be probable; however, they are not anticipated since the sites have alien invasive species and show signs of disturbance. Since the sites were previously approved for development, and paleontology could not have changed during that time, since paleontological processes are historical. It is therefore concluded that a paleontological assessment should not be necessary for this project. However, recently, the competent authority has required that a full phase 1 Palaeontology Impact Assessment (PIA) be conducted for most sites. **The full phase 1 PIA will be conducted prior to construction.**

4. Terrestrial Biodiversity Assessment

A terrestrial biodiversity specialist, Mr Jamie Pote, was appointed to undertake a Terrestrial Biodiversity Assessment to establish the status of the terrestrial biodiversity, as well as flora and fauna species, and assess the potential impact of the proposed development on the biophysical environment.

The sites are indicated to be located within the Algoa Sandstone Fynbos Vegetation Type, which is critically endangered. A small portion of Erf 1134 is mapped as a Critically Biodiversity Area (CBA) according to the Nelson Mandela Bay Municipality Bioregional Plan (2015). This section is set aside as a “No Go” Area / Open Space zone.

The specialist partly disputes the flagged very high terrestrial biodiversity designation and designates a low sensitivity. Both sites are significantly transformed with moderate to dense alien invasion (*Acacia saligna*) and a secondary grassland vegetation with only a few sporadic elements that would suggest historical occurrence of Sand Fynbos. The small remnant patch (<1 Ha) of degraded Sand Fynbos on Erf 984 is also limited in its conservation value and would not be considered to be of value to retain. The remnant pocket has also not significantly changed since the original assessment was conducted in 2020. The specialist concludes that the proposed development of the sites will not result in a significant loss of natural vegetation nor any significant impact on conservation targets and/or ecological processes. A search and rescue will be conducted before construction.

5. Aquatic Biodiversity Assessment

The site has a high aquatic biodiversity sensitivity according to the Screening Tool Report.

Erf 984, Parsonsvei, has no aquatic features in close proximity. Aquatic features nearby of Erf 1134, Parsonsvei, include a small unchanneled valley-bottom wetland and a non-perennial drainage line located southwest of the Erf. The small unchanneled valley-bottom wetland is more than 100 m away, and there is a built environment between the area that will be developed for this feature. The non-perennial drainage line crosses through the southwestern tip of the site; however, this area will be retained as open space. It is unlikely that the water features will be impacted by the development, and any indirect impact that may arise will be low to negligible.

Previous authorisation for the sites was obtained without any Aquatic Impact Assessment being conducted, and as per a meeting held with DEDEAT at their offices on 18 June 2025, all studies which were previously conducted would only be required to be reviewed, and no additional specialist requirements would be required. Development of Erf 984, considering the proper implementation of stormwater management, should lower any possible impacts to the Baakens River to negligible. It has been concluded that the proposed project will have a low impact on aquatic biodiversity, and **an aquatic impact assessment should thus not be required.**

6. Avian Assessment

A terrestrial biodiversity specialist has been appointed to undertake a Terrestrial Biodiversity Specialist Assessment to establish the status of the terrestrial biodiversity, as well as the flora and fauna species. This assessment includes the assessment of avifauna species and is discussed in the Biodiversity Assessment Report. It is the opinion of EAS that the Biodiversity Assessment thoroughly covers possible impacts and the assessment of potentially affected avifauna species, and that a **separate Avian Species Assessment or compliance statement will not be required.**

7. Socio-Economic Assessment

The two sites are identified as forming part of the western suburbs, which implies that the developments should be in line with the Western Suburbs Local Spatial Development Framework/ WSLSDF (NMBM, 2011). The proposed developments of Erf 984 and Erf 1134, Parsonsvelei, will take place within the property rights of the properties.

Development of Erf 1134, Parsonsvelei will promote densification inside the urban growth boundary, and it will make optimum use of existing resources in established urban areas, such as commercial/retail, roads and public facilities. The development of warehousing and industrial land uses will also address the needs of the residents with differing skill levels. The creation of an extension to the Greenbushes industrial area is maintained as a mechanism to create this type of employment (MSDF, 2015). Urban corridors consist of a combination of structuring elements that are significant in maximising the objectives of restructuring land uses and the creation of economic opportunities by intensifying various activities.

The priority of the LSDF is to increase socio-economic growth in the western suburbs. This notion provides the understanding that not all land uses have equal potential to generate employment opportunities; hence, mixed-use development is encouraged (NMBM, 2011). The two sites are well linked to the greater metropolitan area with major transportation routes (MSDF, 2015). The sites join Old Cape Road, which links to the N2 freeway via Seaview Road, and other prominent roads include Diaz Arterial, Walker Drive, Kragga Kamma Road, and Kabega Road. These roads also provide important internal circulation functions within the WSLSDF. The connection of the sites will further be enhanced by the N2 interchanges associated with the Bay West City development, Redhouse-Chelsea, and Walker Drive Extensions.

Due consideration has been given to any potential socio-economic impacts the proposed development might have on the community and the surrounding areas. It has been concluded that the proposed project will have a positive socio-economic impact and **should not require a formal Socio-Economic Impact Assessment or the compilation of a compliance statement.**

8. Plant Species Assessment

Impact on flora was covered by the Terrestrial Biodiversity Assessment. None of the flagged plant species of special concern or any other endangered or critically endangered flora were recorded during the assessment conducted in 2020, and none were found during the follow-up assessment in July 2025, and are not likely to occur. The specialist disputes the medium plant species sensitivity and designates a low sensitivity. Based on this, a **separate Plant Species Assessment or compliance statement will not be required.**

9. Animal Species Assessment

In the Terrestrial Biodiversity Report, the specialist concluded that the heavily degraded and invaded nature of the sites is unlikely to provide suitable permanent or sustainable habitat for any flagged fauna species of conservation concern. No Endangered or Critically Endangered fauna species were found to be present or likely to be affected by the scale of activity, although some may occur as transient visitors. The specialist, therefore, designated the sites as having a low sensitivity. It is the opinion of EAS that the Biodiversity Assessment thoroughly covers possible impacts and the assessment of potentially affected fauna species, and that a **separate Animal Species Assessment or compliance statement will not be required.**

CONCLUSION OF SITE SENSITIVITY VERIFICATION REPORT

Engineering Advice and Services (EAS) has been appointed by the applicant, Lucro Trading 128 (Pty) Ltd, to apply for environmental authorisation to develop Erven 984 and 1134 Parsonsvei, situated south of Old Cape Road in the Nelson Mandela Bay Municipality. The applicant intends to develop Erf 984 Parsonsvei (7.29 Ha) and Erf 1134 Parsonsvei (3.307 Ha) in line with their permitted uses. Lucro Trading 128 (Pty) Ltd is the registered owner of both properties. The two erven are situated approximately 600 meters apart, where Erf 984 is along Reserve Road and Erf 1134 can only be accessed via Romulus Crescent, but neither has direct access to Cape Road.

In accordance with the Notice of the requirement to submit a report generated by the national web-based environmental screening tool in terms of section 24(5)(h) of the NEMA, 1998 (Act No 107 of 1998) and regulation 16(1)(b)(v) of the EIA regulations, 2014, as amended, a screening tool was generated and identified specific site sensitivities and themes to be assessed for this specific project. On 20 March 2020, the Minister of Forestry, Fisheries and the Environment published the general requirements for undertaking site sensitivity verification for environmental themes for activities requiring environmental authorisation (Government Gazette No. 43110). In terms of these requirements, prior to commencing with a specialist assessment, the current land use and environmental sensitivity of the site under consideration by the screening tool must be confirmed by undertaking a site sensitivity verification. This report is regarded as the Site Sensitivity Verification Report and should guide and motivate the reasons for not including certain specialist assessments which were indicated by the screening tool as required specialist assessments.

As mentioned under *Discussion of identified Specialist Assessments* above, it can be summarised that the following specialist assessments are necessary and have been facilitated:

- Terrestrial Biodiversity Impact Assessment

The following specialist assessments (in the opinion of the EAP) have been covered by the above assessments:

- Animal species Assessment
- Plant species Assessment
- Avian Impact Assessment

The following specialist assessments will be completed before construction commences:

- Archaeological and Cultural Heritage
- Palaeontological Assessment

The following specialist assessments have been deemed not necessary for this EIA process (either by motivation or as confirmed by the responsible authority):

- Landscape/Visual Assessment
- Socio-Economic Assessment
- Landscape/Visual Assessment
- Aquatic Biodiversity Assessment

PHOTOGRAPHIC EVIDENCE

Site Photographs – Erf 984





Site Photographs – Erf 1134



