

# SITE SENSITIVITY VERIFICATION REPORT

**PROPOSED AD HOC SETBACK LINE FOR PORTION 91 OF THE FARM  
NO 516**

**March 2026**



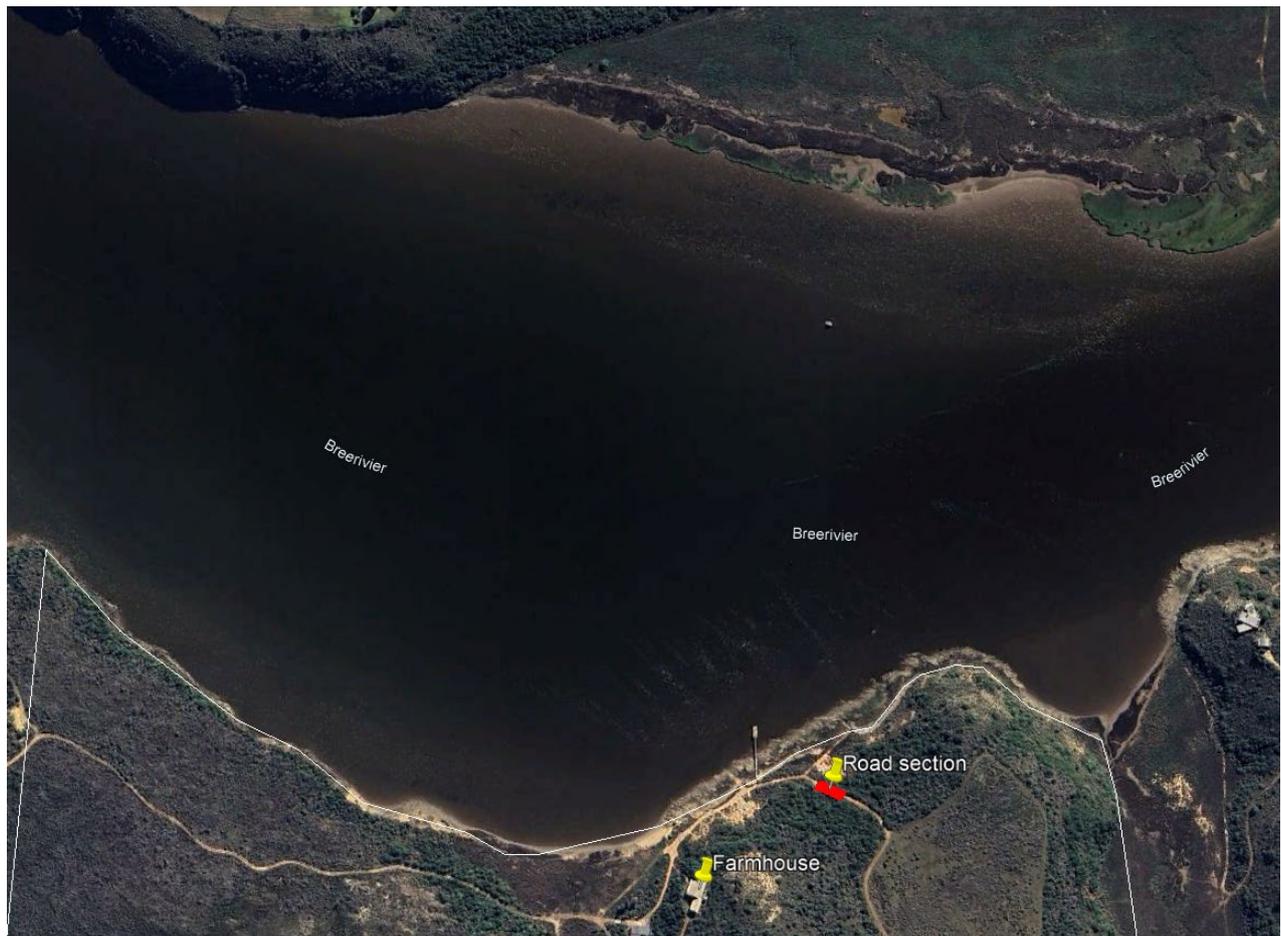
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## INTRODUCTION

A Screening Tool Report was generated from the national web-based environmental screening tool, as contemplated in Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended. The Screening Tool identifies potential environmental sensitivities on the site in terms of 'Environmental Themes' (categorized as low, medium, high and very high) and makes Specialist Impact Assessment recommendations. The outcome of the Screening Tool was verified by the EAP in the form of a site visit and subsequent Site Sensitivity Verification Report. This Site Verification Report is informed by an investigation and a site inspection undertaken on 15 September 2025.

This application is for an Ad Hoc Setback Line, for the proposed expansion of the existing farmhouse by adding two small additional units on both sides of the house and the upgrade of an existing road section regarded as "like for like" works. The proposed works is within 100m of the high water mark of the Breede River Estuary.

The screening tool report was based on the placement of the new development footprint. Refer to **Figure 1**, the latest Google Earth Imagery of the proposed works.



**Figure 1: Google Satellite photo of the site (farm boundary in white outline, farmhouse labelled, road section in red and labelled), showing the Breede River Estuary**

## INCENTIVE, RESTRICTION OR PROHIBITION

The Screening Tool Report (**Annexure J**) identified no nearby wind or solar developments. There are no intersections with EMF areas and no development incentives, restrictions, exclusions or prohibitions apply to the site. The area of works is 30-45 meters from the high-water mark of the Breede River Estuary.

## SCREENING TOOL ENVIRONMENTAL SENSITIVITIES WITH SITE PHOTOGRAPHS (ANNEXURE H)

The Screening Tool Report uses national datasets to identify environmental sensitivities and potential specialist studies that may be required for any development. Since the datasets are not necessarily ground truthed, there may be instances where the level of sensitivity rating is incorrect or irrelevant to the scale, nature, and type of development.

The following relevant themed sensitivities are identified in the Screening Tool Report:

## Agricultural Sensitivity (Figure 2)

This theme is rated as medium sensitivity and the EAP is not in agreement since the area of works is a like for like road upgrade and two small areas next to a farmhouse not suitable for agriculture. The agricultural sensitivity for the area of works is therefore low.

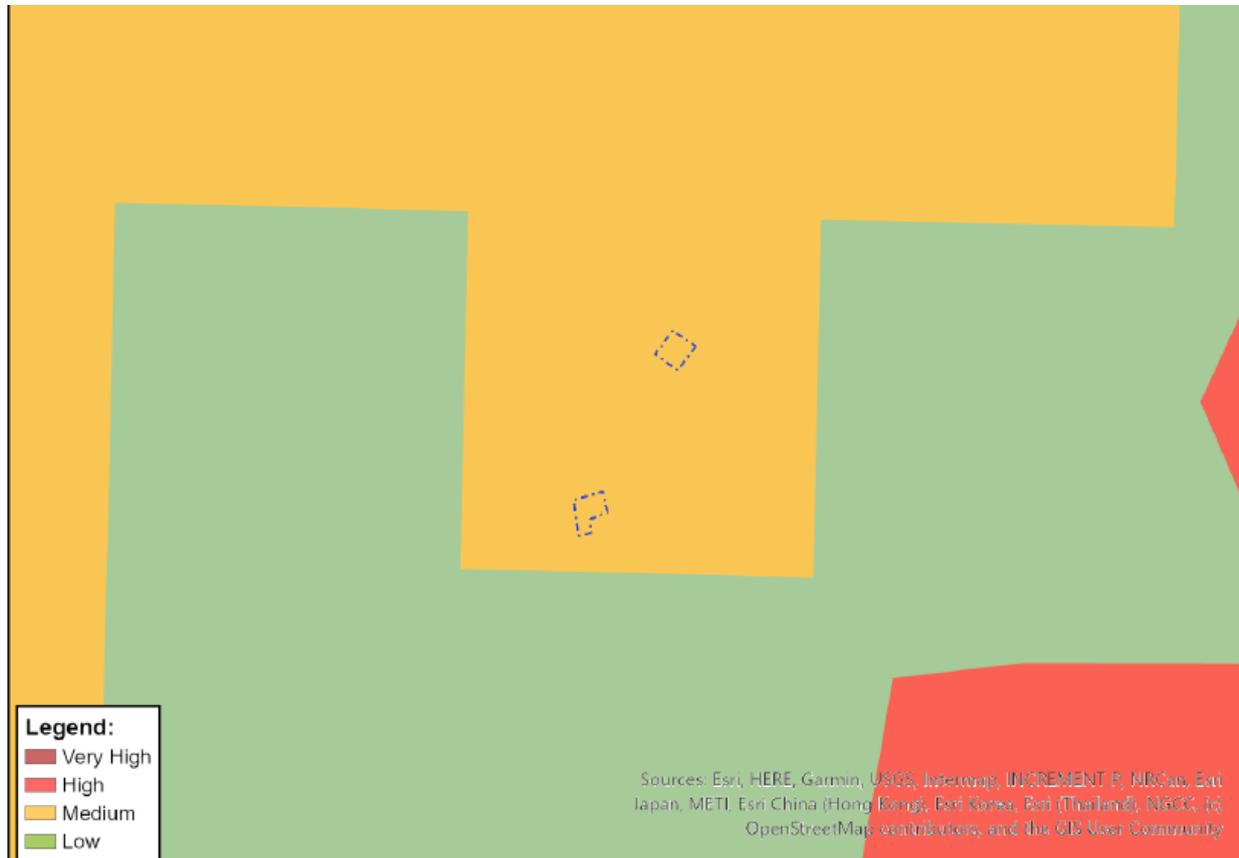


Figure 2: Agricultural Theme

## Animal Species (Figure 3)

The proposed site falls within a high sensitivity category for animal species. This high rating is given due to the possible presence of primarily the following bird species, this is due to the river, wetland and estuary habitat that the farm borders onto.

- African Mach Harrier - prefers in marshes or reedbeds and open grasslands and cultivation near wetlands.
- Caspian Tern – prefers coastal areas
- Southern Black Koraan – prefers open ground
- Denham’s Bustard – prefers open ground
- Martial Eagle – wearied habitat with a wide distribution
- Black Harrier – prefers natural shrubland, fynbos and renosterveld

The site where the farmhouse is located is transformed consisting of a house and surrounding garden as per photo report. This area is surrounded by intact natural indigenous vegetation, that is primarily thicket, the house site is 44m from the estuary edge that relate to open areas. The habitat characteristics where the two additional units are proposed resemble those preferred by the black harrier as identified in the Screening Tool Report. The site is not in the open and its setback from the estuary. The vegetation removal is under 300 sqm that is below the NEMA threshold, it’s a small disturbance next to an existing farmhouse footprint. The like for like road upgrade section is an existing component therefore faunal species sensitivity is irrelevant. Therefore, the sensitivity is not disputed but the likely impact due to the small scale is low.



Figure 3: Animal Species Theme

**Aquatic Biodiversity (Figure 4a & b) – Refer to Specialist Aquatic Biodiversity Screening Report attached under Appendix L**

This theme is rated as a Very high sensitivity, and the EAP agrees since the farm borders the Breede Rover Estuary however the proposed works are setback and away from the aquatic sensitive features as per photo report and figure 4b&c below. It is outside the EFZ, future 1:100 flood line and no wetlands exist on area of new works.

Based on the SSVR, DEA&DP requested in a letter dated 5 February 2026 that a Freshwater Ecologist must confirm the proximity of wetlands in relation to the proposed development.

The specialist further ground truth the site and confirmed under Appendix L that *“The site verification confirms that the development is situated outside of any sensitive aquatic environments. In response to the DEA&DP letter dated 5 February 2026, this assessment confirms that the site is not located within a wetland. The proposed works are located above the delineated watercourses and are separated from these features by dense natural vegetation. In addition, the development footprint is situated above both the Coastal Management Line and the future 1:100-year flood line. The proposed activities will involve less than 300 m<sup>2</sup> of indigenous vegetation clearance and comprise like-for-like upgrades associated with the road improvement.”*



Figure 4a: Aquatic Biodiversity Theme



Figure 4b: The farmhouse in picture is outside the EFZ, the floodplain wetland in green is incorrect considering its mapped up to 12m msl it's a fynbos thicket area not a floodplain, pls refer to the below future 1:100 year flood line confirming the correct floodplain extent.



Figure 4c: Farmhouse and new footprints in blue is above the flood lines, the road in red is existing and works will be like for like.

### Archaeological and Cultural Heritage (Figure 5)

Archaeology and cultural heritage of the site is rated as low. The EAP is in agreement with the significance rating structures are not older than 60 years and footprint is small.



Figure 5: Archaeological and Cultural Heritage Theme

### Civil Aviation (Figure 6)

This theme has a high sensitivity. The EAP confirms that this rating is due to the Air Force Base Overberg being 50km from the site. The proposed development will have no impact on any civil aviation facilities or flight paths.



Figure 6: Civil Aviation Theme

**Defence (Figure 7)**

The site is located within a low sensitive area for the Defence theme. The EAP concurs with this rating.



Figure 7: Defence Theme

**Palaeontology (Figure 8)**

The site is located within an area of medium palaeontology sensitivity; the EAP does not dispute this however it is highly unlikely that the proposed development will affect any palaeontological features.



Figure 8: Palaeontology Theme

**Plant Species (Figure 9)**

This theme is rated as medium sensitivity. The rating is due to the vegetation type on site being Overberg Dune Strandveld that is Endangered, the EAP supports this rating. However since the site where the like for like road upgrade is proposed is entirely transformed and that the farmhouse footprint is already cleared and that the new footprint proposed of vegetation removal is small and below 300 sqm NEMA threshold the EAP regard the impact to be low.

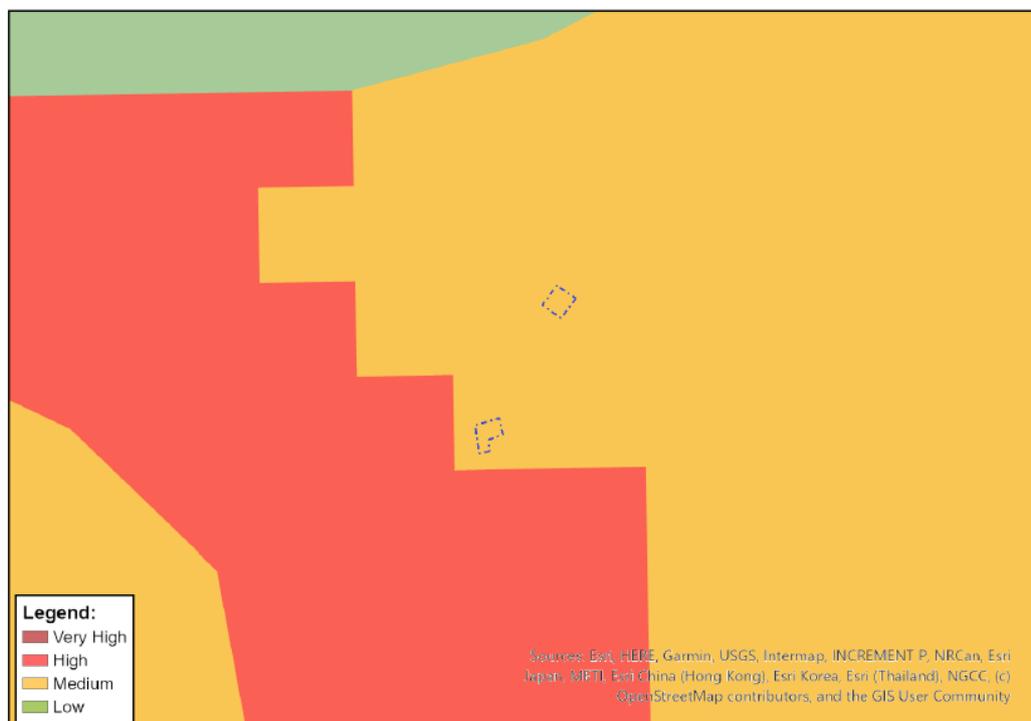


Figure 9: Plant Species Theme

**Terrestrial Biodiversity (Figure 10)**

The terrestrial biodiversity is rated as very high sensitivity. The reasons given in the Screening Report is due to the site being located within the Endangered Overberg Dune Strandveld vegetation type, CBA and CBA2 and FEPA sub

catchment. However, the site for the road upgrade are completely transformed (existing road) and the new footprint for the two additional units and parking is partly on an existing garden areas and the total cumulative vegetation clearance is less than 300 sqm. Therefore there is no Overberg Dune Strandveld present on the road works area, the two units and parking development including a construction impact buffer will result in less than 300 sqm clearance that is below the NEMA threshold that doesn't require authorisation. Only 50% of the works are inside the CBA and the new works are outside wetlands and watercourse and also outside the Estuarine Functional Zone, the EAP is of the opinion that the impact will be low.



Figure 10: Terrestrial Biodiversity Theme

### SCREENING TOOL RECOMMENDED SPECIALIST STUDIES

The following specialist studies have been recommended by the Screening Report. An explanation is given as to why the recommended studies will not be conducted. Refer to site photographs included in **Annexure H**.

1. Landscape/Visual Impact Assessment

The development on two additional units is very small partially inside an existing building envelope, it is single storey and an upgrade of what is currently on site and the result is very low visual impact expected. Therefore, **no Visual Impact Assessment will be done.**

2. Archaeological and Cultural Heritage Impact Assessment

**No Archaeological or Heritage Studies will be conducted,** since the proposal does not trigger the National Heritage Resources Act, 1999 (Act No. 25 of 1999). The site will have no impact on any adjacent or nearby heritage resources and it will not alter the sense of place of the area.

3. Palaeontology Impact Assessment

**No Palaeontological Studies will be done** since the site has medium palaeontological significance and the fact that the works is small scale and no deep excavations are proposed..

4. Terrestrial Biodiversity Impact Assessment

The EAP **does not believe that any terrestrial biodiversity studies are needed**, since the road does not contain any natural vegetation, works will be like for like, and that the clearance of the vegetation for the two additional units and parking is part of the farmhouse envelope partly on garden areas and demolition areas with the total new vegetation clearance being below the 300 sqm threshold because of the small nature of works. The new works are outside of the future 1:100 flood line, wetlands, watercourses and the EFZ.

#### 5. Aquatic Biodiversity Impact Assessment

The site has a very high aquatic sensitivity rating – **The EAP motivated that no aquatic studies are required** considering that the road is existing and 33 m from the estuary edge, the two additional units is 44 m away from the estuary edge, it is elevated at 12-13m msl, it is above the future 1:100 floodline which is the highest risk line. Its outside the EFZ. The works are not proposed in an aquatic environment, it is outside of such sensitive areas. In addition, the site of works contains no wetlands or watercourses. **However DEA&DP requested on 5 February 2026 that an Aquatic Specialist must confirm that the site is not located within a wetland. This was done and confirmed by a specialist, the report is attached under Appendix L.**

#### 6. Hydrology Impact Assessment

**A Hydrology Impact Assessment will not be conducted.**

The site is within 100m of the high-water mark (HWM) of the sea but does not lie in coastal public property and it is above the Coastal Management Line and above the future 1:100 year flood line.

#### 7. Socio-Economic Assessment

**A socio-economic study is not considered necessary** since no significant negative socio-economic impacts are expected. Only positive impacts are expected; the works are very small in nature.

#### 8. Plant Species Assessment

**No Botanical Studies will be undertaken** considering that the threshold for indigenous vegetation clearance is below 300 sqm, therefor NEMA is not triggered.

#### 9. Animal Species Assessment

The proposed site falls within a high sensitivity category for animal species. This rating is given due to the possible presence of primarily bird species. The habitat characteristics of the farmhouse do not resemble most of the species except for the black harrier, however the works are very small and part of the house envelope therefore impacts are unlikely. The road upgrade is on an existing road. Therefore, **no faunal studies are necessary.**

## **ANNEXURE H: SITE PHOTOGRAPHS**

## **ANNEXURE J: SCREENING TOOL REPORT**