



APPENDIX M2 – SITE SENSITIVITY VERIFICATION REPORT

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SITE SENSITIVITY VERIFICATION REPORT:
**UNAUTHORIZED INDIGENOUS VEGETATION CLEARING,
EXCAVATION AND DEVELOPMENT ON PORTION 54 OF
FARM 516, THE POTTEBERG ESTATES, INFANTA**

Date: February 2026

Document Version: 1.0

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1. INTRODUCTION AND BACKGROUND

This report aims to verify the site sensitivity for Portion 54 of Farm 516, The Potteberg Estates, Infanta. The farm is located approximately 13 kilometres northwest of Infanta and borders the Breede River which is located to the north of the property. The property is approximately 23.81 ha in size.

In February 2024 unlawful clearing of indigenous vegetation, excavation and development took place onsite. In total, approximately 0.4 ha of vegetation was removed across three disturbance footprints (Figure 1).

Prior to the unlawful clearing, the property contained an existing main dwelling, terraced structures and an associated access road network. The total disturbance footprint associated with this existing main dwelling was approximately 1443 m².

The following activities have already taken place on site and form part of this Section 24G application:

- Unlawful clearing and levelling of approximately 0.24 ha around the existing main dwelling (Footprint 1) – *to be retained*.
- Unlawful clearing and soil removal of approximately 0.12 ha within the floodplain saltmarsh (Footprint 2) – *to be rehabilitated*.
- Unlawful clearing of approximately 0.02 ha in the southern portion of the property adjacent to the access road (Footprint 3) – *200m² to be retained*.
- Construction of an approximately 64 m² double garage within Footprint 1 – *to be retained*.
- Construction of an approximately 8 m² pumproom within Footprint 1 – *to be retained*.
- Construction of an approximately 36 m² caretaker's cottage within Footprint 3 – *to be retained*.

The following activities are linked to the unlawful works on site and form part of this Section 24G application:

- Proposed additions to the existing main dwelling within Footprint 1, comprising a bedroom extension (approximately 72 m²), a roofed deck area (approximately 164 m²), and a carport (approximately 54 m²).
- Landscaping with primarily indigenous vegetation within all remaining disturbed portions of Footprints 1 and 3 not occupied by structures or access roads.
- Rehabilitation of the floodplain saltmarsh within Footprint 2, where unauthorised clearing occurred and where no development is proposed.

The initial vegetation clearance, excavation and development took place onsite prior to the applicant obtaining the necessary Environmental Authorisation (EA). The applicant, WABD Investments (Pty) Ltd, therefore intends on applying for a retrospective EA to legalise the clearance, excavation and development within footprint 1 and footprint 3. Footprint 2 will be rehabilitated.

The information contained in this report was ground truthed by means of a site visit that was conducted on the 12th of August 2025 by Paul Slabbert (EAPASA: 2019/1036).

Access - Access to the property is existing. At the time of development, internal unpaved roads provided access to the development footprint, and these access ways remain in place.

Electricity – The main dwelling is supplied with electricity through an existing Eskom connection, supplemented by solar panels on the roof. The caretaker's cottage is powered independently by a dedicated solar energy installation on the cottage roof.

Sewage – Sewage from the main dwelling is managed via an existing septic tank. A new septic tank has been installed within footprint 3 to service the caretaker's cottage.

Water – The main dwelling is served by an existing water supply system. Water is primarily obtained through the capture of rainwater, supplemented with treated river water when required. Rainwater is collected from the roof areas and conveyed via piping to on-site storage tanks. Additional storage tanks have been installed to improve water capture and storage capacity during rainfall events. The current onsite storage capacity is approximately 120000L. Rainwater supply is supplemented with water pumped from the Breede River. Water is pumped from the river to the storage tanks via an existing pump located on the jetty and an existing pipeline primarily during the winter months when the water is fresh and sufficient supply is available.

Water supply to the caretaker's cottage is provided through an above-ground pipeline located within the road reserve, which conveys water from the main dwelling's collection and storage tanks to the cottage.

Domestic waste – Waste will be sorted on site and taken to the local transfer station in Infanta for collection and disposal by the municipality.



Figure 1: Locality Map – Unlawful clearance within Portion 54 of Farm 516, Infanta

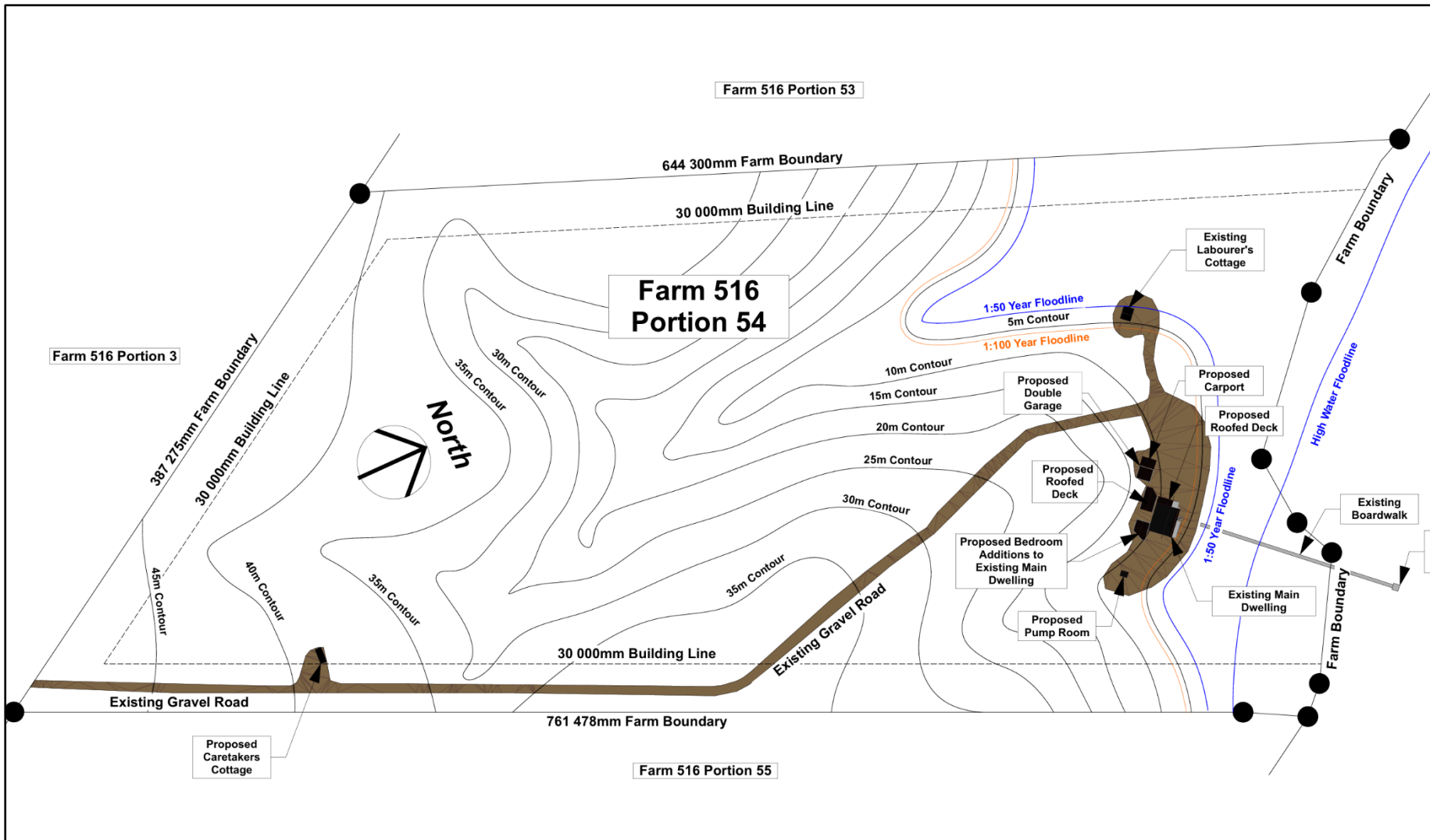


Figure 2: Proposed Site Development Plan for Portion 54 of Farm 516, Infanta

2. EIA TOOLKIT REPORT RESULTS

The Site Screening report was based on the placement of the development footprints within the farm boundaries. It should therefore be noted that while certain areas may have a lower sensitivity rating than indicated overall, the DEA screening tool automatically reverts to the highest sensitivity for the block area drawn. The Screening Tool Report assigned the following sensitivity ratings to the development footprint:

2.1. Agriculture Theme (Medium Sensitivity)

The screening tool report generated for the cleared footprints indicates that Footprint 1 and Footprint 2 are classified as having 'low' agricultural sensitivity while Footprint 3 is classified as having 'medium' agricultural sensitivity (**See Figure 3**). The DEA screening tool automatically reverts to the highest sensitivity. The report therefore flags the development footprint as Medium Sensitivity. The reasons listed were:

- Low - 04. Low-Very low
- Low - 03. Low-Very low
- Low - 05. Low
- Medium - 07. Low-Moderate
- Medium - 06. Low-Moderate

The site is zoned as Agriculture. The Western Cape Biodiversity Spatial Plan however maps the majority of the farm as a terrestrial Critical Biodiversity Areas (CBA) with aquatic CBA's also present onsite. CBA areas are defined in the WCBSPP as "Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure. The management objective is to maintain these in a natural or near-natural state, with no further loss of natural habitat. Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate". Desktop resources from the National Department of Agriculture Forestry and Fisheries indicates that the agricultural enterprise in this area is 'Fruit' (**See Figure 4**), however the property is currently not cultivated, and no cultivation is proposed.

Due consideration has been given to the potential impact of the proposed development on agriculture, and it is determined that the proposed development will have an insignificant impact. It is the opinion of the EAP that no further input will be required from an agricultural specialist. The Department of Agriculture will be included as a commenting authority within the Public Participation Process.



Figure 3: Agricultural Sensitivity. The cleared areas are shown as blue dotted lines within the site boundaries.

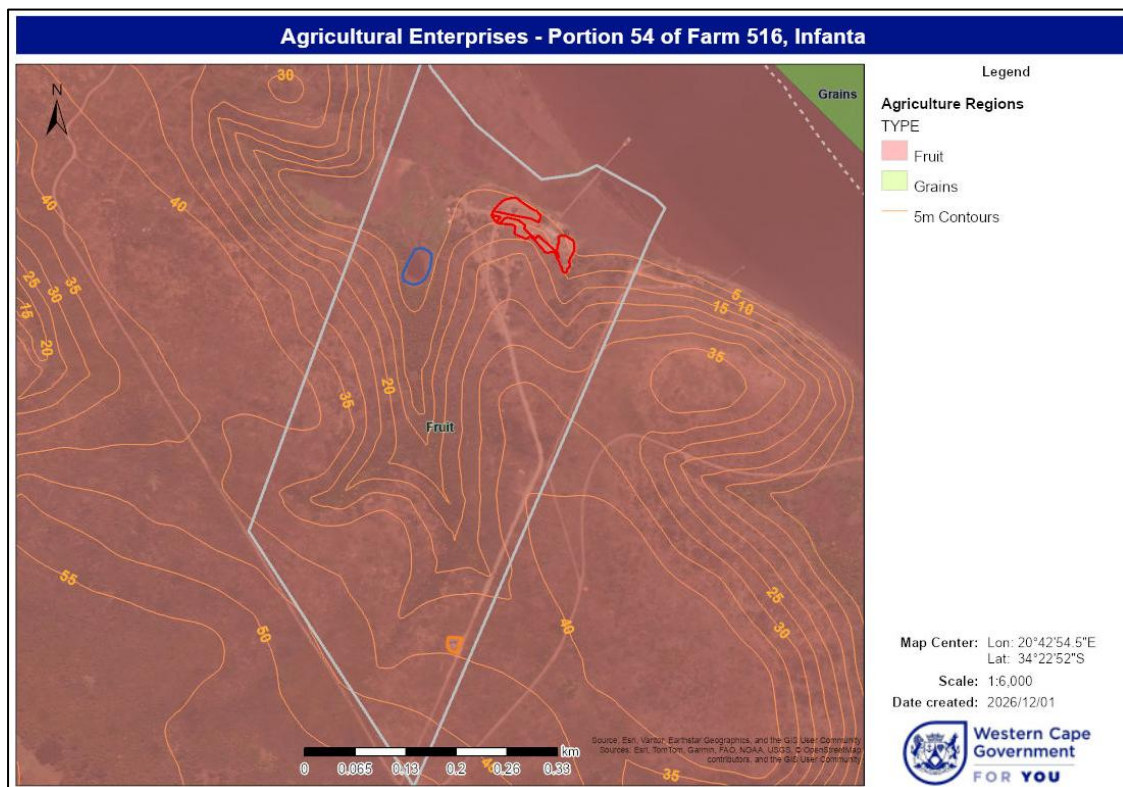


Figure 4: National Department of Agriculture Forestry and Fisheries, Agricultural Enterprises Map Layer

2.3. Aquatic Biodiversity Theme (Very High Sensitivity)

The Aquatic Biodiversity theme is identified and mapped as 'very high' sensitivity throughout the property (See Figure 6). This is due to the location of the property within a FEPA sub catchment, the presence of an estuary and rivers onsite as well as the presence of estuary and wetland CBAs onsite.

The property is situated along the southern banks of the Breede River, approximately 13 km upstream of the Breede River mouth. This reach of the river forms part of a known estuarine zone. Given the high aquatic sensitivity and the likely presence of aquatic constraints in the vicinity of the proposed development footprints, an aquatic specialist (Jeanne Snyman of everWater Freshwater Consulting Services) was appointed to undertake a specialist assessment.



Figure 6: Aquatic Biodiversity Sensitivity. The cleared areas are shown as blue dotted lines within the site boundaries.

2.4. Archaeological and Cultural Heritage Theme (Low Sensitivity)

This theme is identified and mapped as 'low' (See Figure 7). The National Heritage Resources Act is not applicable to the proposed development as such a submission to HWC will not be required. No further action required

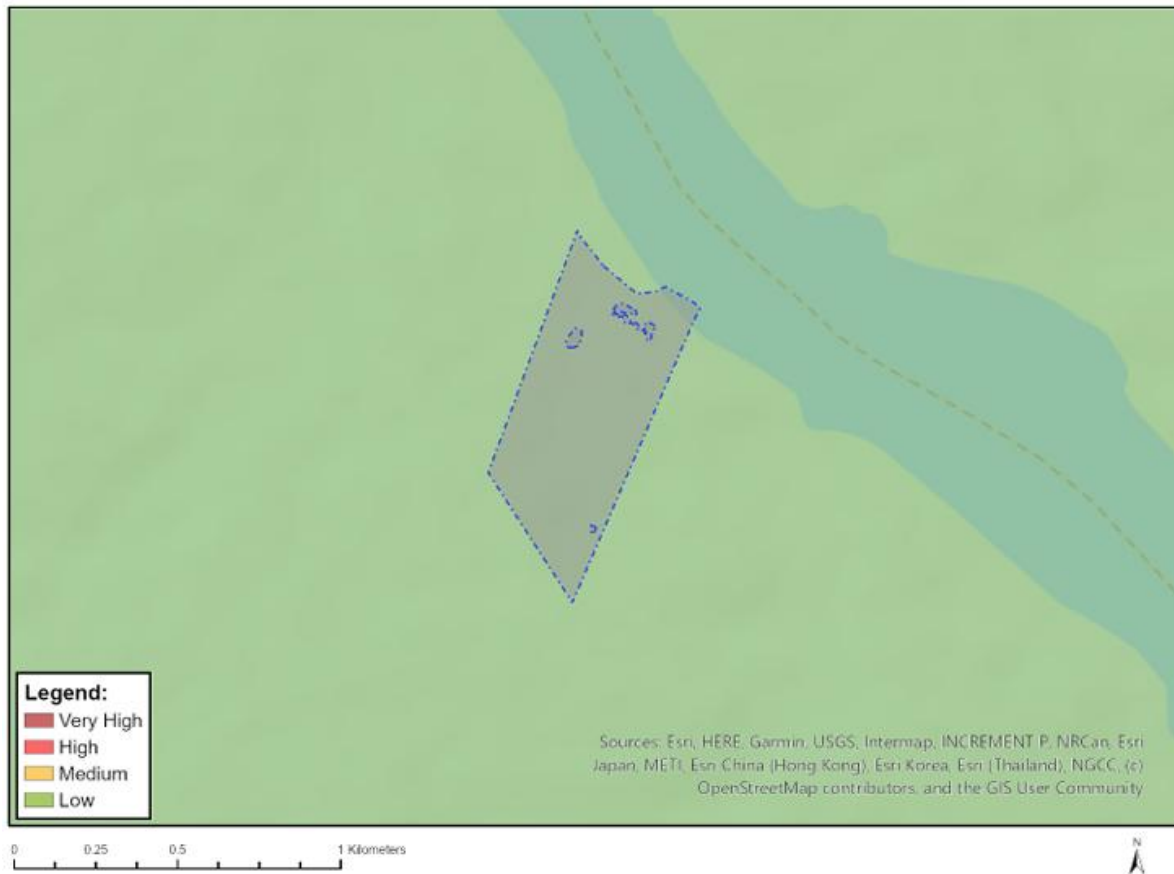


Figure 7: Archaeological and Cultural Heritage Sensitivity. The cleared areas are shown as blue dotted lines within the site boundaries.

2.5. Civil Aviation Theme (High Sensitivity)

This theme is identified as 'high' due to the following: 'Dangerous and restricted airspace as demarcated '(See Figure 8). The development will however not introduce any structures or activities that could interfere with aviation operations, flight paths, or airspace safety. Given the nature of the development activities, no aviation-related impacts are anticipated, and as such no further assessment or specialist input is considered necessary.



Figure 8: Civil Aviation Sensitivity. The cleared areas are shown as blue dotted lines within the site boundaries.

2.6. Defence Theme (Low Sensitivity)

A 'low' sensitivity has been assigned to the property (See Figure 9). As no negative impacts on any defence installations are expected, this theme does not apply further to the application and is considered negligible.

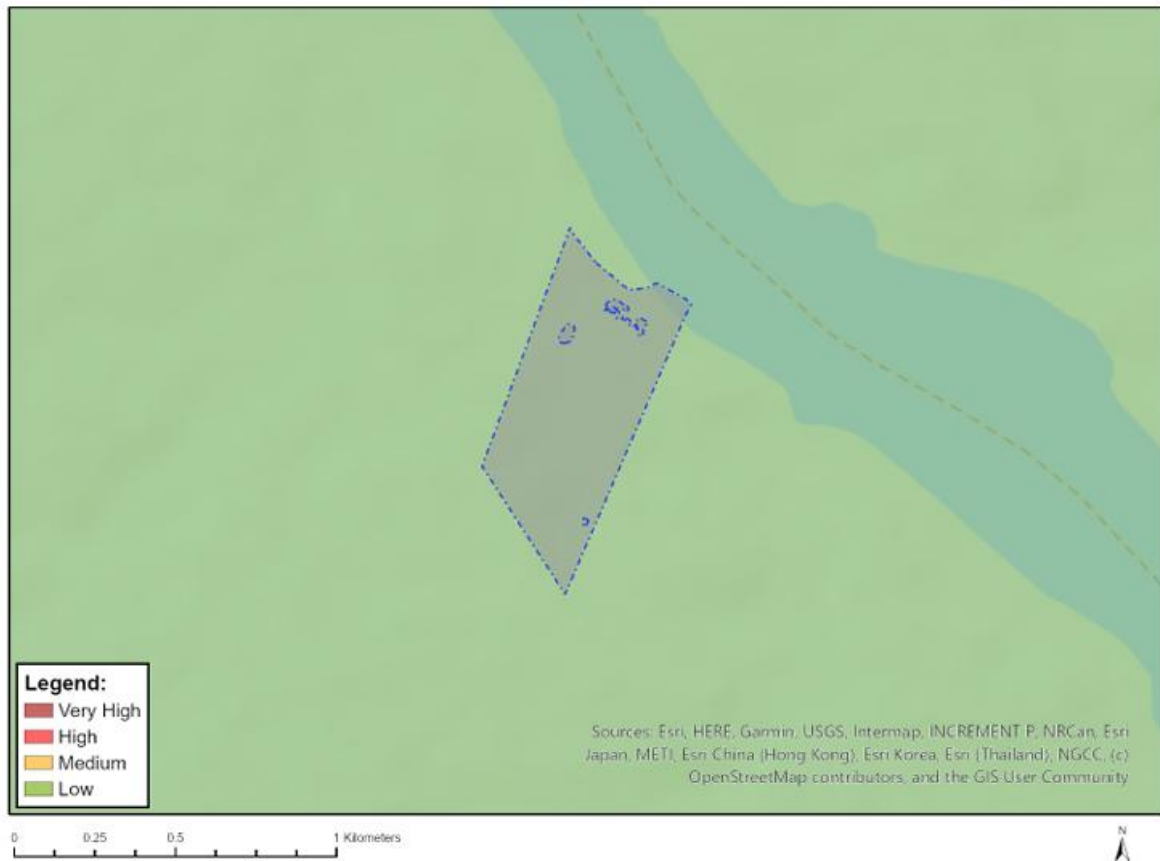


Figure 9: Defence Sensitivity. The cleared areas are shown as blue dotted lines within the site boundaries.

2.7. Palaeontology Theme (Very High Sensitivity)

The screening tool report generated for the cleared footprints indicated that Footprint 1 and Footprint 2 have 'medium' palaeontological sensitivity while Footprint 3 is classified as having 'very high' sensitivity (**See Figure 10**). The DEA screening tool automatically reverts to the highest sensitivity. The report therefore flags the development footprint as Very High Sensitivity. The National Heritage Resources Act is however not applicable to the proposed development; and no submission to HWC will be required, but it is recommended by the EAP that the HWC Fossil Finds Procedure must be implemented.

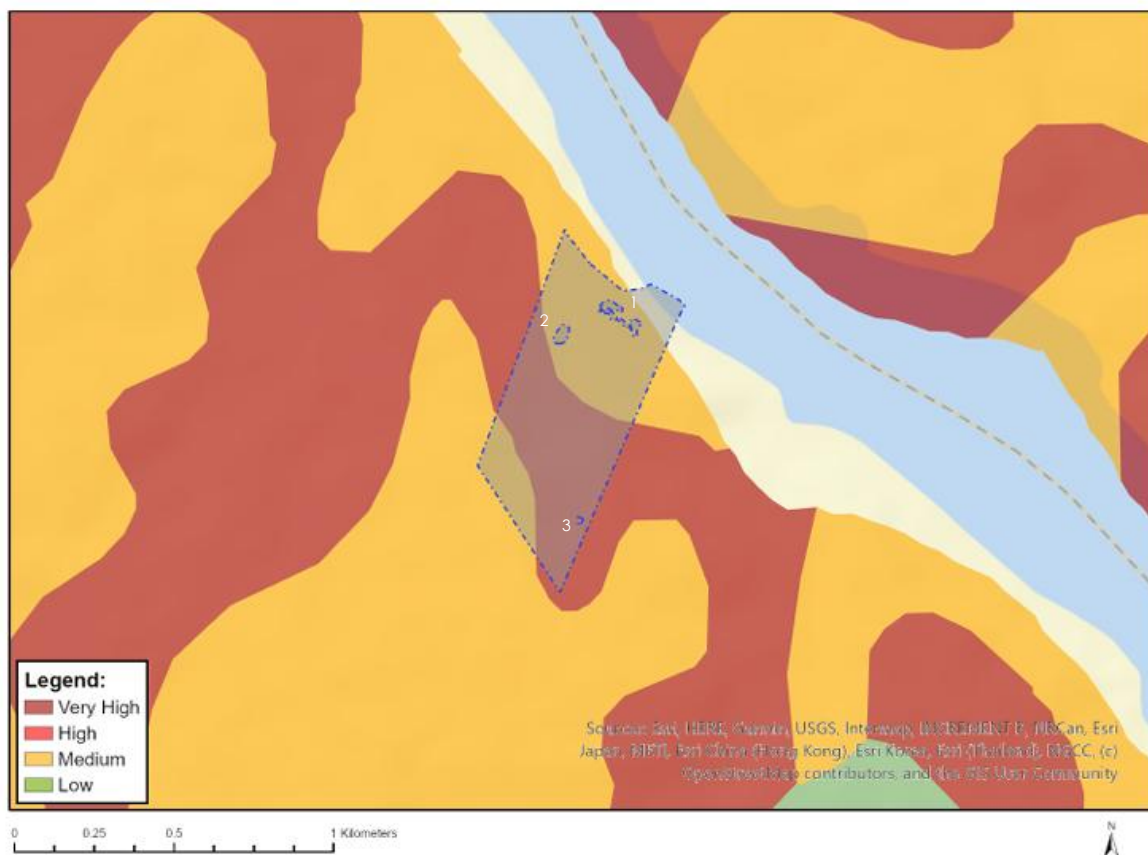


Figure 10: Palaeontology Sensitivity. The cleared areas are shown as blue dotted lines within the site boundaries.

2.8. Plant Species Theme (Medium Sensitivity)

This theme is identified as 'medium' sensitivity for all three development footprints (See Figure 11). The development site is located adjacent to the Breede River in the Lower Breede River Valley and is within the Core Cape Subregion (CCR) of the Greater Cape Floristic Region (GCFR; Manning & Goldblatt 2012). The property has not been cultivated and currently comprises natural vegetation with varying levels of alien invasive vegetation infestations. Given the nature of the development activities undertaken and the listed activities triggered, Nick Helme, has been appointed to conduct a botanical assessment.

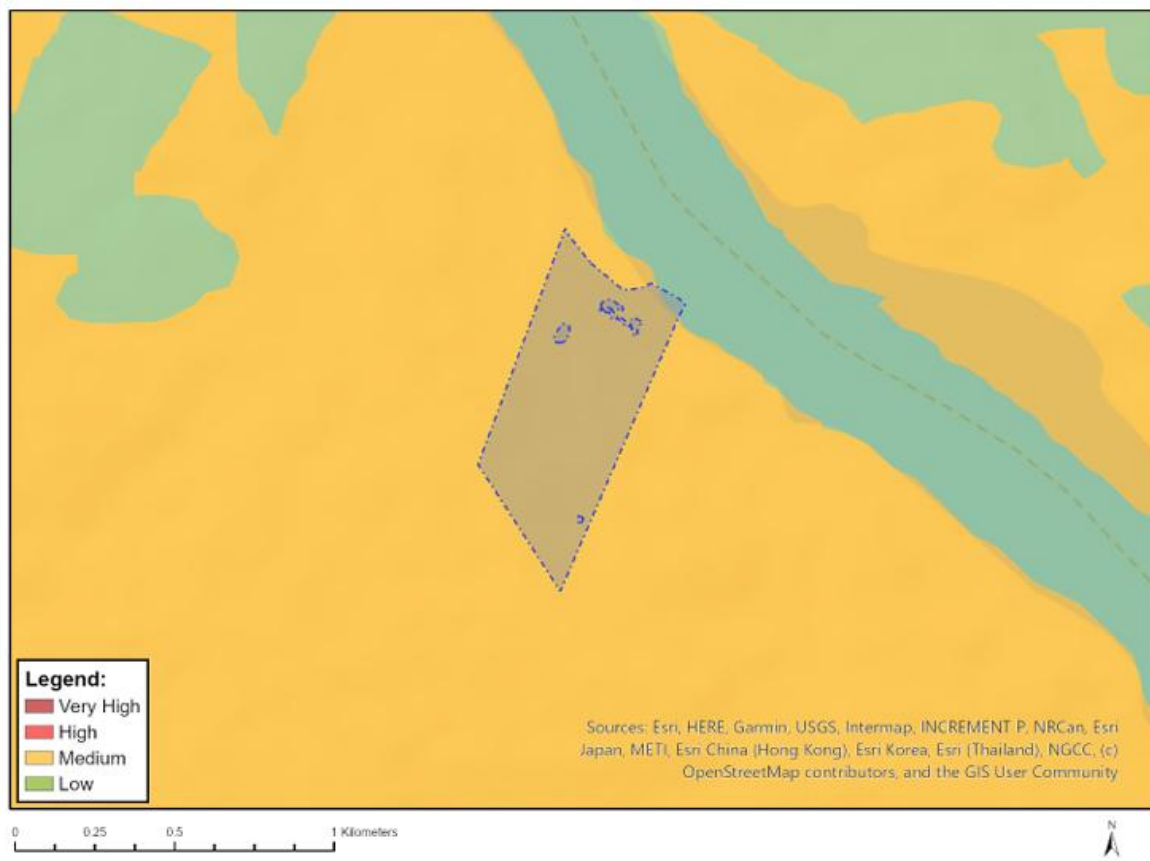


Figure 11: Plant Species Sensitivity. The cleared areas are shown as blue dotted lines within the site boundaries.

3. SPECIALIST STUDIES IDENTIFIED

The following Specialist Studies were identified as part of the Screening Tool Reports:

1. Landscape/Visual Impact Assessment

The property on which the development activities were undertaken and are proposed is located in a remote rural area and is set back from public roads. While the development activities around the main dwelling will be visible from the Breede River, these views are limited, localised, and experienced by a low number of receptors. Landscaping and rehabilitation of portions of the cleared areas are proposed and will further reduce visual contrast over time. It has also been recommended that natural colours are used for walls and roofing to minimize potential visual impacts. Visual impacts are considered to be localised, largely reversible and negligible. A specialist Landscape / Visual Impact Assessment is accordingly not required.

2. Archaeological and Cultural Heritage Impact Assessment

Due to the low sensitivity rating of the site and the small scale and nature of the proposed development, impacts on Archaeological and Cultural Heritage is deemed negligible, and no further studies will be required. It is however recommended by the EAP that the HWC Fossil Finds Procedure must be implemented, this has been included in the EMPr.

3. Palaeontology Impact Assessment

Due to the small scale and nature of the proposed development, impacts on Palaeontology is deemed negligible, and no further studies will be required. It is however recommended by the EAP that the HWC Fossil Finds Procedure must be implemented, this has been included in the EMPr.

4. Terrestrial Biodiversity Impact Assessment

A specialist (Nick Helme) has undertaken an assessment of the site.

5. Aquatic Biodiversity Impact Assessment

A specialist (Jeanne Snyman) has undertaken an assessment of the site.

6. Socio-Economic Assessment

Due to the small scale and nature of the proposed development. Impacts on Socio-Economy is deemed negligible, and no further studies will be required.

7. Plant Species Assessment

A specialist (Nick Helme) has undertaken an assessment of the site.

8. Animal Species Assessment

A specialist (Nick Helme) has undertaken an assessment of the site.

Conclusion

No further specialist studies will be required in terms of NEMA.