PHS CONSULTING
environmental, land-use, eco-tourism planning and management.

SITE SENSITIVITY VERIFICATION REPORT:

UNAUTHORISED ESTABLISHMENT OF FREE-RANGE CHICKEN HOUSES ON PORTION 349 OF FARM 811, TESLAARSDAL (CALEDON)

Date: May 2026

EAPs: Paul Slabbert – EAPASA Reg. No. 2019/1036

Candidate EAP: Josie Howard - EAPASA Reg. No. 2025/19917

cell: 082 740 8046 | Tel:(028) 312 1734 | Fax:086 508 3249 | paul@phsconsulting.co.za | PO Box 1752 |Hermanus 7200

1. INTRODUCTION AND BACKROUND

Unauthorised establishment of free-range chicken houses on Portion 249 of Farm 811 (Solitaire Free Range) took place between 2013 and 2024. The property is located inside the proclaimed Tesselaarsdal local area, 3km northeast of Tesselaarsdal and 15km southeast of Caledon within the Theewaterskloof Municipality (see Figure 1). The farm is accessed off an existing dirt road.

The farm consists of 10 chicken houses, 8 of which are unlawful and require Environmental Authorisation. Each chicken house includes a free-range grazing area covered by grass with yellow wood trees. In 2012, two chicken houses were established which housed approximately 2000 to 3000 hens. This facility did not trigger any listed activities in terms of the EIA Regulations of 2010. In 2013/2014 (before December 2014), an additional two chicken houses were developed which housed an additional 5500 hens in total. At this point, the expansion activity required environmental authorisation. A further three chicken houses were constructed in 2016/2017 which housed roughly 5000 hens each. Thereafter, the facility was expanded by a further 3 hen houses between 2020 and 2024. Each hen house holds 5000 chickens.

Figure 1: Location of the site.

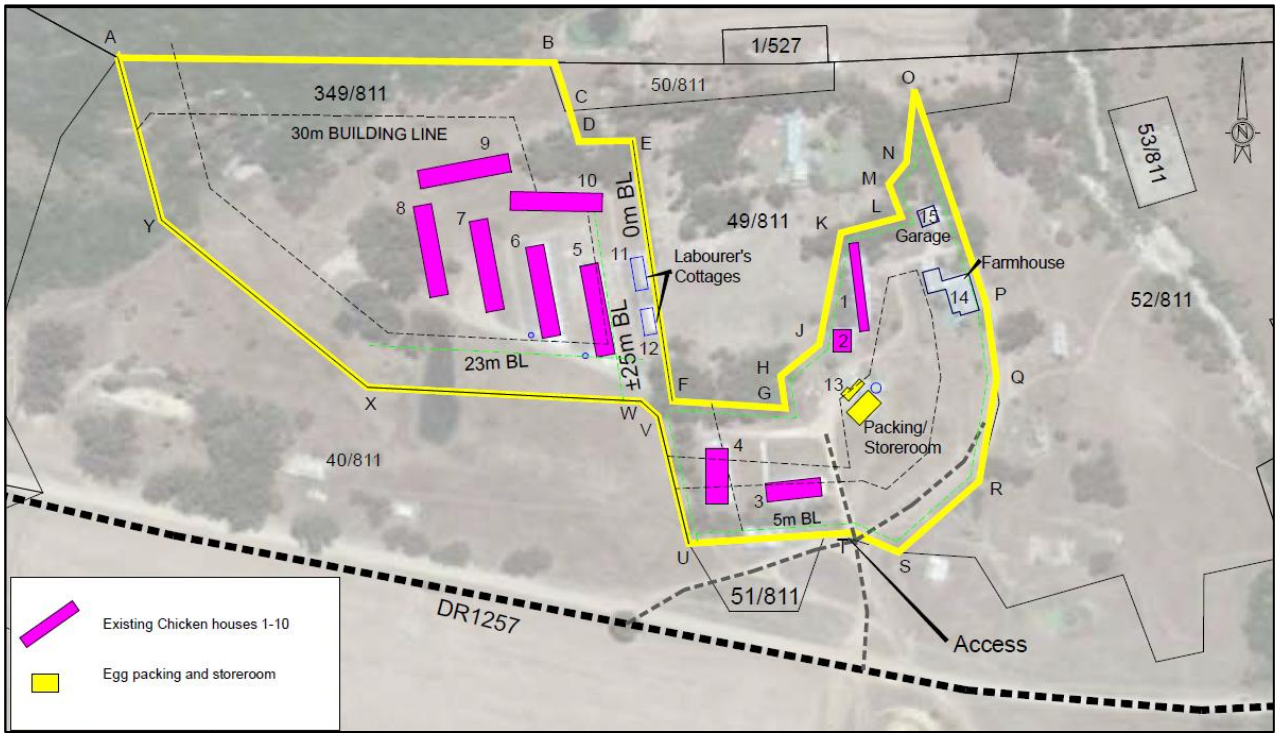

Figure 2: Site layout and development plan.

2. CONTENTS & METHODOLOGY:

The applicable protocols or minimum information requirements, which were published in Government Notice No. 320 of 20 March 2020 (Government Gazette No. 43110 of 20 March 2020 refers), which came into effect on 9 May 2020, must be applied to the impact assessment process that must be followed. "The site sensitivity verification must be undertaken through the use of:

a) A desk top analysis, using satellite imagery;
b) A preliminary on-site inspection; and
c) Any other available and relevant information."

Furthermore, "the outcome of the site sensitivity verification must be recorded in the form of a report that –

a) Confirms or disputes the current use of land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.
b) Contains motivation and evidence (e.g. photographs) of either verified or different use of either the verified or different use of the land and environmental sensitivity; and
c) Is submitted together with the relevant assessment report prepared in accordance with the requirements of the EIA Regulations."

The applicant, Mr Grindley-Ferris, intends on applying for a retrospective Environmental Authorisation (EA) to legalise the undertaken activities by means of a Section 24G application process. The information contained in this report was ground truthed by means of a site visit that was conducted on 25 March 2025 by Josie Howard and Paul Slabbert (EAPASA Reg. No. 2019/1036).

3. EIA TOOLKIT REPORT RESULTS AND ENVIRONMENTAL THEMES

The Site Screening report was based on the placement of the development footprint 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 (Appendix A) assigned the following sensitivity ratings to the activities:

3.1 Agricultural Theme (Very High Sensitivity)

The site has a very high agricultural sensitivity since the site is located on agricultural land within a farming area. It must be understood that the proposed activities are in keeping with the agricultural zoning and practices of the intended land use of the property (Agriculture with consent use for intensive feed farming) as well as the surrounding area. The proposed activity relates to the overall enhancement of the agricultural potential of the property as it is an agricultural supportive project. Given that the development will contribute to agriculture onsite and in the region, it is the opinion of the EAP that no further input will be required from an agricultural specialist. Furthermore, as part of the Public Participation Process, I&APs will have the opportunity to comment, and the Department of Agriculture will be included as a commenting authority. It is our opinion that the Department of Agriculture (DoA) would be the Competent Authority to comment regarding the agricultural sensitivity of the site, the nature of the project and the need for specialist involvement.

The overall VERY HIGH sensitivity rating in terms of this particular project is therefore refuted. A LOW sensitivity rating would be more appropriate given the overall supportive agricultural nature of the project. The Western Cape Department of Agriculture will be notified of the application as a registered I&AP and will be requested to provide comment.

3.2 Animal Species Theme (High Sensitivity)

The proposed site falls within a high sensitivity category for animal species but the majority of the property is classified as having a medium sensitivity with a small portion of the property classified as having a high sensitivity (Figure 3). The triggering species were:

- Aves-*Circus ranivorus* (High)
- Aves-*Neotis denhami* (High)
- Invertebrate-*Brinckiella aptera* (Medium)
- Invertebrate-*Aneuryphymus montanus* (Medium)

The EAP does not agree with this high sensitivity rating. The development took place on existing agricultural fields/fallow lands. It is highly unlikely that natural vegetation was present within the development footprint prior to construction of the chicken houses (Figures 4, 5 and 6) and thus it is improbable that the faunal species listed would have been present on the development site. Faunal species presence can be directly related to floral and wetland habitat availability, therefore, freshwater ecologist, Jeanne Snyman from EverWater, has been appointed to complete an aquatic assessment for the site.

The High Sensitivity rating is refuted by the EAP and instead a LOW animal species sensitivity is recommended.

Figure 3: Animal Species theme sensitivity.

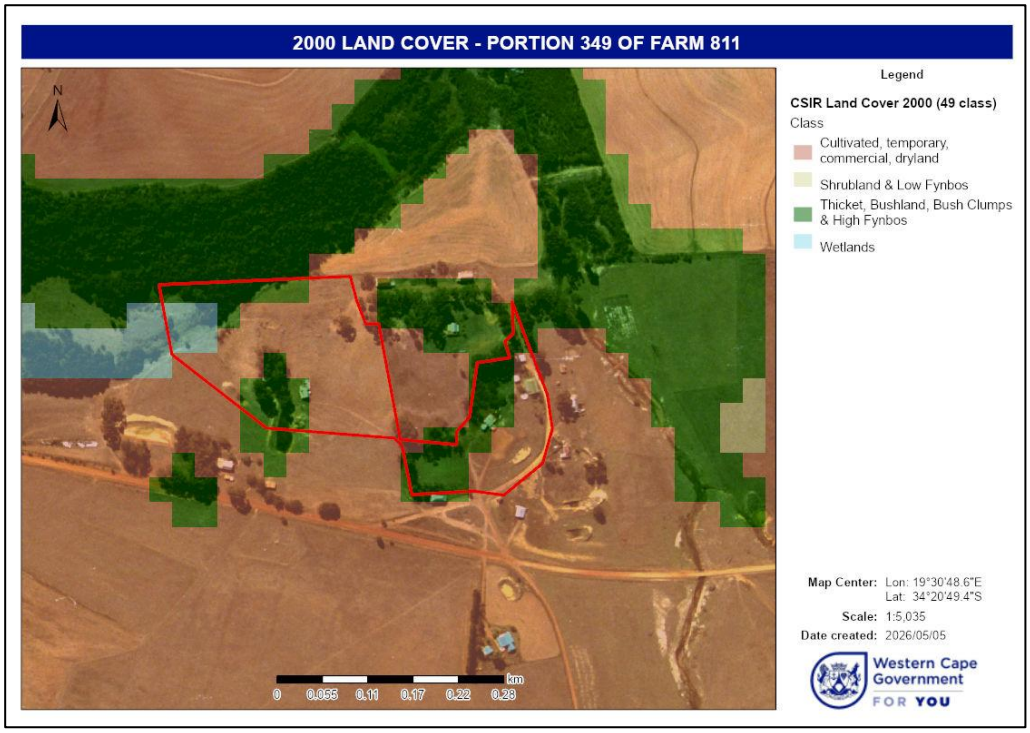

Figure 4: 2000 Map of land cover taken from Cape Farm Mapper. The site is shown to be mostly cultivated land.

Figure 5: State of the vegetation prior to the construction of the chicken houses (2019).

Figure 6: 2004 Google Earth imagery showing that the site has been largely transformed for more than 20 years.

3.3 Aquatic Biodiversity Theme (Very High Sensitivity)

The majority of the site is identified as having a low sensitivity; however, the western corner is marked as very high (Figure 7). The features triggered were:

- CBA: Wetland (Very High)
- Wetlands_Channelled valley-bottom (Very High)

The western portion of the site is marked as having a very high sensitivity due to its proximity to the Hartebees River and associated wetlands (aquatic CBA). A Freshwater Specialist, Jeanne Snyman from *EverWater*, has been appointed to determine the sensitivity. The specialist determined that the impacts associated with the development are of an indirect nature and of very low risk, with no current evidence of habitat loss or hydrological alteration and therefore a Compliance Statement has been compiled.

The VERY HIGH rating is refuted, and a LOW rating is recommended based on the specialist's assessment.

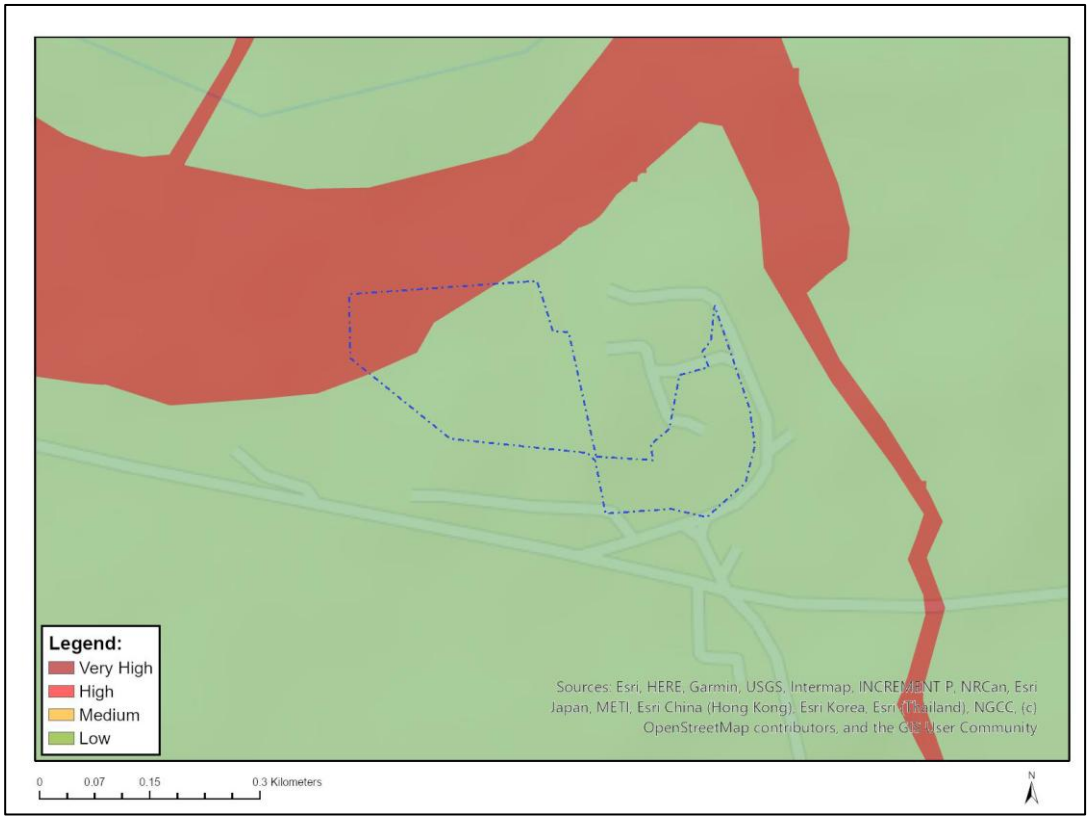

Figure 7: Aquatic Biodiversity Sensitivity.

3.4 Archaeological and Cultural Heritage Theme (Low Sensitivity)

Archaeology and cultural heritage of the site is rated low, and the EAP concurs with this rating. No archaeological or heritage resources are on or near the site. The development does not trigger the National Heritage Resources Act and therefore does not require any heritage studies.

The LOW rating is confirmed by the EAP.

3.5 Civil Aviation Theme (High Sensitivity)

This theme has a high sensitivity (Figure 8) and the reasons given are:

- Dangerous and restricted airspace as demarcated (High)
- Between 8 and 15 km of other civil aviation aerodrome (Medium)

The proposed development will have no impact on any civil aviation facilities or flight paths.

The project will have no impact on any aviation facilities and/or activities and therefore a LOW rating is confirmed for the site.

Figure 8: Civil Aviation sensitivity.

3.6 Defence Theme (Low Sensitivity)

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

The LOW rating is confirmed by the EAP.

3.7 Palaeontology Theme (Very High Sensitivity)

The palaeontological sensitivity is identified as very high (Figure 9). The EAP does not agree with the on-site sensitivity rating since the site has been used for agricultural activities (fallow lands used for grazing) (Figures 4 and 5) prior to the establishment of the chicken houses. It is therefore unlikely that any paleontological resources remain on site.

The Very High rating is disputed by the EAP and instead a LOW significance is confirmed.

Figure 9: Palaeontology Theme sensitivity.

3.8 Plant Species Theme (Medium Sensitivity)

This theme is rated as medium sensitivity (Figure 9). The site has been disturbed and transformed by agricultural activities for more than 20 years (Figures 4, 5 and 6). No natural vegetation would have occurred within the development footprint prior to the development (Figure 11); thus, it is improbable that the flora species listed in the screening tool would have been present on the development site.

The overall 'Medium' sensitivity rating in terms of this project is therefore refuted. A LOW sensitivity rating would be more appropriate given the location of the activities within a working agricultural farm.

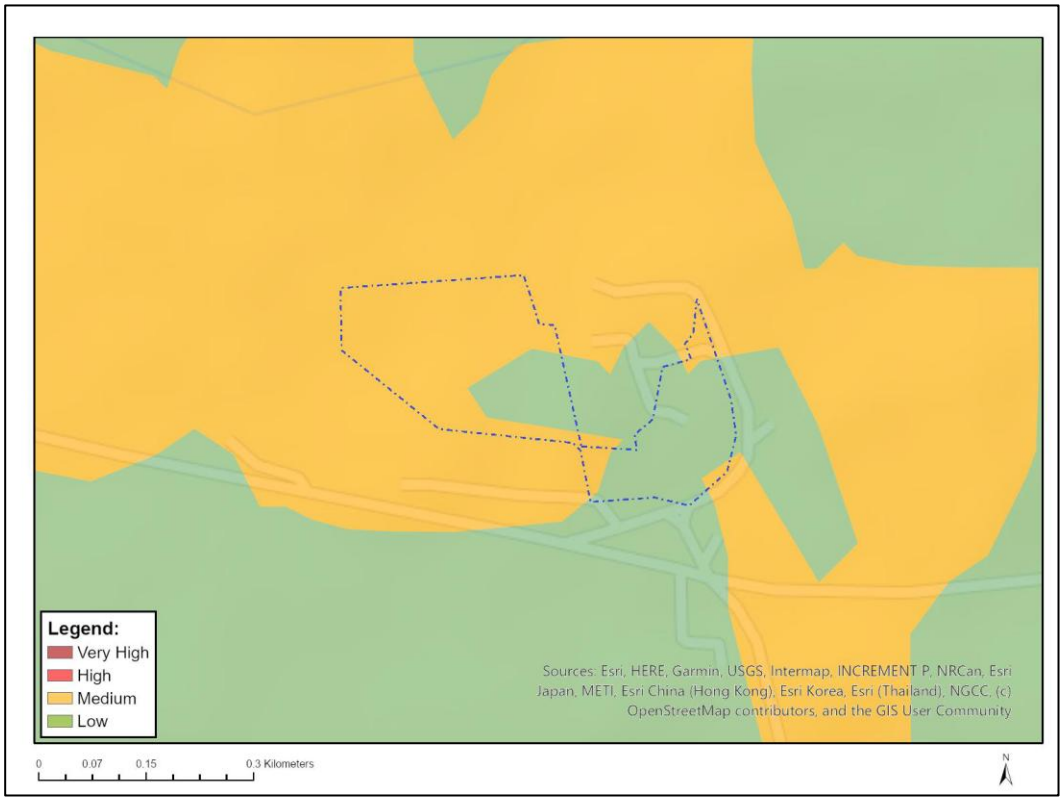

Figure 10: Plant Species Theme sensitivity.

Figure 11: Disturbed land where houses were constructed. Image taken in 2019.

3.9 Terrestrial Biodiversity Theme (Very High Sensitivity)

The terrestrial biodiversity is rated as very highly sensitive (Figure 12). The reasons given in the Screening Report:

- CBA: Terrestrial (Very High)
- CBA2: Terrestrial (Very High)
- Critically Endangered Western Ruens Shale Renosterveld (Very High)

The areas of the site marked as Terrestrial CBA (Annexure C) are almost fully transformed fallow land used for cattle grazing in the past (Figures 4 and 5). Additionally, no natural vegetation was present within the development footprint at the time of construction.

A Very High Sensitivity is refuted, and a LOW Terrestrial Biodiversity sensitivity is recommended by the EAP.

Figure 12: Terrestrial Biodiversity theme sensitivity.

4. SPECIALIST STUDIES IDENTIFIED

The following specialist studies have been recommended by the Screening Report (Annexure A). An explanation is given as to why some of the recommended studies will not be conducted. Refer to site photographs included in Annexure B and Biodiversity Overlay Maps included in Annexure C.

4.1. Landscape/Visual Impact Assessment

The land use of the property and surrounding area is primarily Agricultural in nature, and the proposed activity is in line with the current permissible land use (Agriculture with consent use for intensive feed farming). The chicken houses are in keeping with the character of the area and the site is not located along a scenic route. The structures are neat and Yellow Wood Trees are planted between the structures to provide shade for the hens which is visually more appealing.

4.2. Archaeological and Cultural Heritage Impact Assessment

The site is identified as having a low sensitivity for this theme. No archaeological or heritage resources were identified on or near the site. The NHRA is not triggered. No Archaeological or Heritage Studies will be conducted.

4.3. Palaeontology Impact Assessment

No Palaeontological Studies will be done since it is unlikely that any paleontological resources remain on the disturbed site. Should any resources be identified the Fossil Finds Procedure must be followed (as per the EMPr).

4.4. Terrestrial Biodiversity Impact Assessment

The EAP is of the opinion that Terrestrial Biodiversity Specialist input will not be required based on the following:

- The chicken houses were constructed on fallow land used for grazing in the past
- No natural vegetation was present within the development footprint at the time of development.

4.5. Hydrology Assessment

A freshwater specialist, Jeanne Snyman of EverWater has been appointed to conduct a specialist assessment of the site. Her feedback will determine the need for additional studies. Furthermore, BOCMA are included as I&APs and will have an opportunity to comment in this regard.

4.6. Traffic Impact Assessment

Access to the site is existing and obtained from the DR1257. Traffic generated is minimal. It consists of the delivery trucks on Day 1 of a new cycle and then again at the end of the 14-month cycle removing the chickens that are no longer productive. One truck and two bakkies will enter and leave the site daily for deliveries. Chicken feed is also delivered by means of a truck once every 7-10 days (approximately 3 or 4 times per months). The trips generated by the development will not have an adverse impact on surrounding landowners, or a significant impact on the traffic on the divisional road. Given the surrounding land use and the fact that access to the development areas is direct and existing, the potential traffic impact is anticipated to be low. No further specialist studies will be required.

4.7. Socio-Economic Assessment

No potential negative socio-economic impacts are anticipated for the development of the chicken farm. On the contrary, the chicken farm provides socio-economic benefits for the region in terms of job creation and food security. The intention is facilitating production of free-range eggs in response to the growing market need. No specialist input will be required.

4.8. Ambient Air Quality Impact Assessment

There will be no impacts on ambient air quality, and the Air Quality Act does not apply. No specialist input will be required.

4.9. Plant Species Assessment

Since little to no natural vegetation would have been cleared for the chicken houses, it is not necessary to conduct a botanical assessment. The site consisted of grassed fallow land that historically was grazed by cattle. Refer to the photographs in Annexure B and maps in Annexure C.

4.10. Animal Species Assessment

Terrestrial Fauna Specialist input will not be required. The chicken houses were constructed on grassed fallow lands. No natural vegetation occurred within the development footprint of the chicken houses prior to construction. It is improbable that any faunal species would have occurred on site prior to development.

5. CONCLUSION

The environmental attributes/features on the site which will be sensitive to development are summarised as follows:

- Agriculture Theme (Low Sensitivity)
- Animal Species Theme (Low Sensitivity)
- Aquatic Biodiversity Theme (Very High Sensitivity)
- Archaeological and Cultural Heritage Theme (Low Sensitivity)
- Civil Aviation Theme (Low Sensitivity)
- Defence Theme (Low Sensitivity)
- Palaeontology Theme (Low Sensitivity)
- Plant Species Theme (Low Sensitivity)
- Terrestrial Biodiversity Theme (Low Sensitivity)

Therefore, it is only the need for a Freshwater Impact Assessment that has been determined.

- Jeanne Snyman from *EverWater* has been appointed to undertake the Freshwater Impact Assessment.

ANNEXURE A: SCREENING TOOL REPORT – Appendix N of 24G Application

ANNEXURE B: SITE PHOTOGRAPHS – Appendix D of 24G Application

ANNEXURE C: BIODIVERSITY OVERLAY MAPS – Appendix E of 24G Application