

SECTION 24G APPLICATION

SITE SENSITIVITY VERIFICATION REPORT

For

THE RECTIFICATION OF AN UNLAWFULLY CONSTRUCTED DWELLING ("BUILDING 3") AND THE PROPOSED EXPANSION THEREOF ON PORTION 118 OF FARM 489, ZWARTE JONGERSFONTEIN, WESTERN CAPE

PREPARED FOR:	Mr Danie Maree
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DOCUMENT REFERENCE:	2026.57.03 – Site Sensitivity Verification Report – Portion 118 of Farm 489, Zwarte Jongersfontein
DEA&DP REFERENCE:	16/3/3/6/1/D5/8/0406/25
DATE:	July 2026
SUBMITTED TO:	Competent Authority (DEA&DP); Interested and Affected Parties



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EAP SIGNATURE:



1. INTRODUCTION

Bluepebble Sustainable Solutions has been appointed by Mr Danie Maree to facilitate a Section 24G application in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and the Environmental Impact Assessment Regulations, 2014, as amended ("the EIA Regulations"), addressing:

- the unlawful commencement of a listed activity, being the construction of an existing dwelling ("Building 3"), with a footprint of 104.328 m², on Portion 118 of the Farm 489, Zwarte Jongersfontein ("the property"), in May 2011, without the required Environmental Authorisation; and
- the proposed expansion of Building 3 by approximately 132 m², bringing the total post-expansion footprint to approximately 236 m².

This application is brought voluntarily under Section 24G of NEMA, following comment received from the Department of Environmental Affairs and Development Planning (DEA&DP Ref: 16/3/3/6/1/D5/8/0406/25, dated 04 March 2026), which confirmed that the unlawful commencement had been referred to the Directorate: Environmental Law Enforcement, and directed the applicant to pursue the Section 24G process.

Table 1: Property information

Field	Detail
Municipality	Hessequa Municipality
Farm / Portion	Portion 118 of the Farm 489, Zwarte Jongers Fontein
Property Area	38.4761 ha (384 761 m ²)
Zoning	Agricultural Zone I (Agri I)
Urban Edge	Falls outside the urban edge (confirmed by DEA&DP, 04 March 2026)

The property is accessed via Daytona Way, a gravel coastal road, approximately 600m west of the village of Jongensfontein. The site slopes from a flat coastal terrace down to a rocky shoreline immediately to the south. Two further dwellings exist on the property: Building 1 was constructed prior to the Environmental Conservation Act, 1989 (ECA) coming into effect and the building 2 did not require environmental authorisation in terms of ECA as no listed activities were triggered. and are therefore lawfully established. Building 3, the subject of this application, was constructed in May 2011 and is situated within 100 m of the high-water mark of the sea.

Table 2: Cadastral coordinates of the property

Feature	Latitude (S)	Longitude (E)
Portion 118 of Farm 489	34°25'0.07"	21°21'25.88"



Figure 1: Locality Map – Portion 118 of Farm 489, Zwarte Jongersfontein

1.1. Purpose of the Report

This Site Sensitivity Verification Report (SSVR) forms part of the Section 24G process for the rectification of the unlawful commencement of listed activities and expansion of the dwelling referred to above. This report addresses the findings of the Screening Tool Report generated from the National Web-Based Environmental Screening Tool and provides a motivation for the specialist studies identified by the tool, including reasons for the exclusion of studies not undertaken.

The “Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes” (“the Protocols”) were promulgated in Government Notice No. 320, published in Government Gazette No. 43110 on 20 March 2020, and came into effect on 9 May 2020. The Protocols are provided for in terms of Sections 24(5)(a) and (h) and 44 of NEMA.

The Protocols require the EAP to verify the current use of the site and its environmental sensitivity, as identified by the screening tool, to determine the specialist input required for the application.

2. ENVIRONMENTAL CONSIDERATIONS

2.1. Terrestrial Biodiversity and Plant Species

According to the National Biodiversity Assessment (SANBI, 2022), the property is mapped as Hartenbos Dune Thicket, a vegetation type with an Endangered ecosystem threat status.. The property falls predominantly within Critical Biodiversity Area 1 (CBA 1), with smaller areas classified as CBA 2 under the 2023 Western Cape Biodiversity Spatial Plan (WCBSP), and the Jongensgat Private Nature Reserve adjoins the eastern boundary of the property.

The specialist terrestrial biodiversity assessment (Capensis Ecological Consulting, July 2026) confirms that the southern portion of the study area supports intact Hartenbos Dune Thicket, with smaller areas of semi-intact or transformed habitat corroborating the WCBSP mapping. Three plant species of conservation concern were recorded (*Agathosma muirii*, *Cullumia carlinoides* and *Leucospermum praecox* – the latter two Vulnerable), together with one protected tree species (*Sideroxylon inerme*). The habitat present was also assessed as potentially supporting three animal species of conservation concern: *Aonyx capensis* (Cape clawless otter), *Circus maurus* (Black Harrier) and *Lepidochrysops littoralis* (a butterfly).

The unlawful clearance associated with the 2011 construction of Building 3 is estimated, based on historic aerial imagery, to have removed approximately 1 450 m² of Endangered ecosystem. With the rehabilitation, alien vegetation control, fire management and offset planting measures recommended by the specialist and carried into the EMP, the residual impact of the development is determined as Medium-Low Negative.



Figure 2: Vegetation mapping of Portion 118 of Farm 489



Figure 3: SANBI Original Ecosystem Threat Status

Specialist Mapping (Capensis Ecological Consulting, 2026)

The desktop mapping above is broadened below with mapping extracted directly from the specialist terrestrial biodiversity assessment, which independently mapped the site at a finer scale following ground-truthing on 15 May 2026.



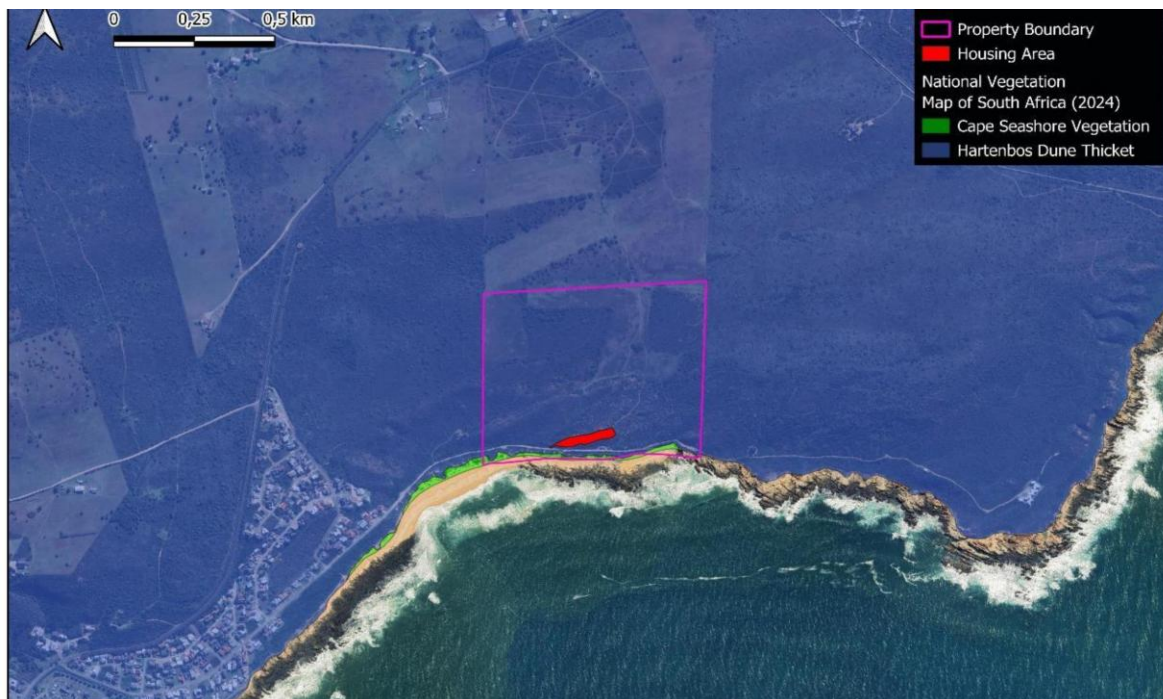


Figure 5: The study area in relation to the National Vegetation Map of Southern Africa (SANBI, 2024), overlaid on a Google Earth satellite image (Terrestrial Biodiversity Report compiled by Capensis).



Figure 6.: The study area in relation to the Western Cape Biodiversity Spatial Plan (CapeNature, 2025), showing CBA 1, CBA 2, ESA 1 and the adjoining Jongensgat Private Nature Reserve (Terrestrial Biodiversity Report compiled by Capensis)).

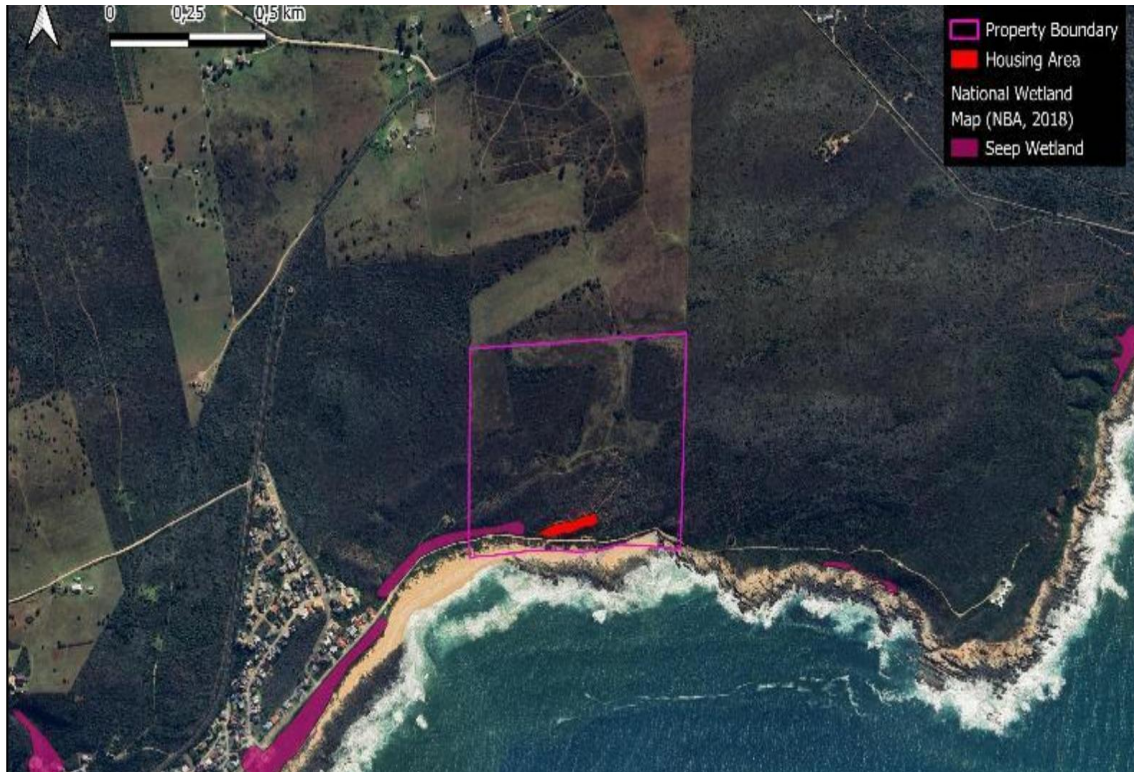


Figure 7: Map of wetland habitats described in the National Wetland Map (NBA, 2018), overlaid on a Google Earth satellite image. A small seep wetland is mapped in the dune slack inland of the property, well removed from Building 3 (Terrestrial Biodiversity Report compiled by Capensis). See also Section 2.2.

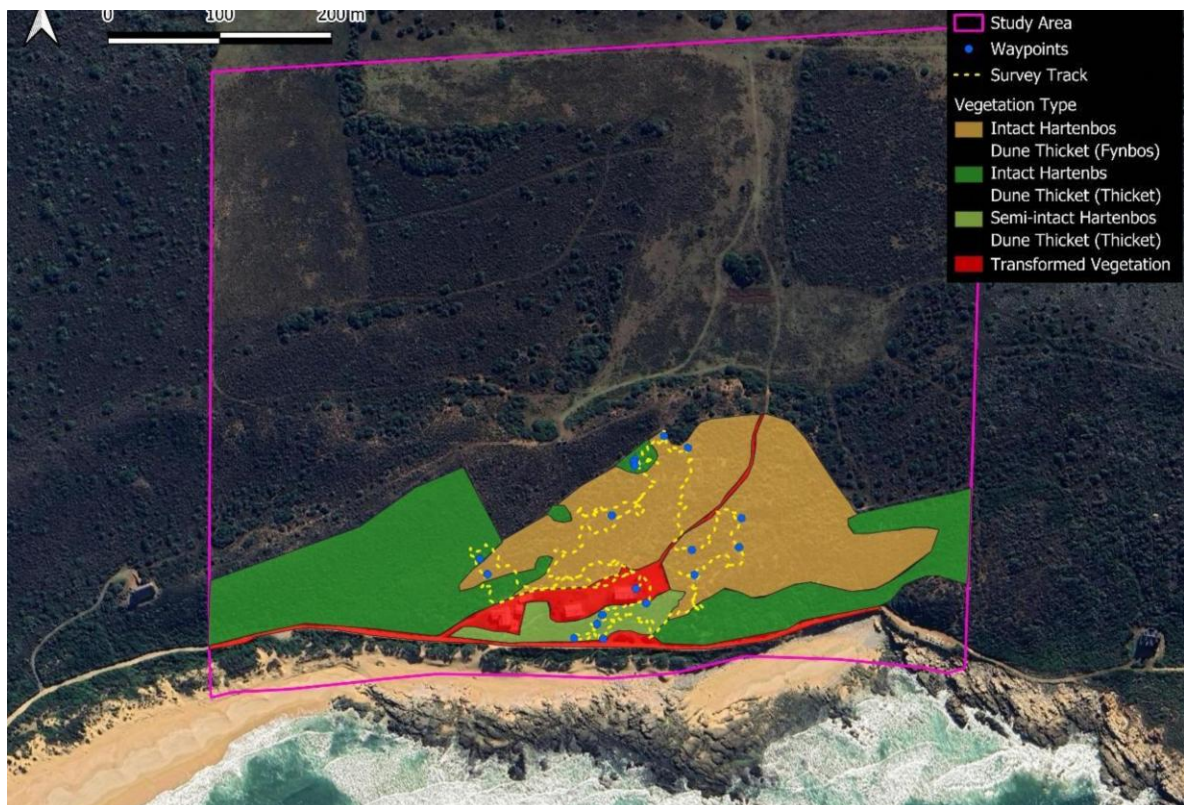


Figure 8: The habitats identified at the study area, superimposed on a Google Earth satellite image, showing intact, semi-intact and transformed Hartenbos Dune Thicket relative to the survey track and waypoints (Terrestrial Biodiversity Report compiled by Capensis).

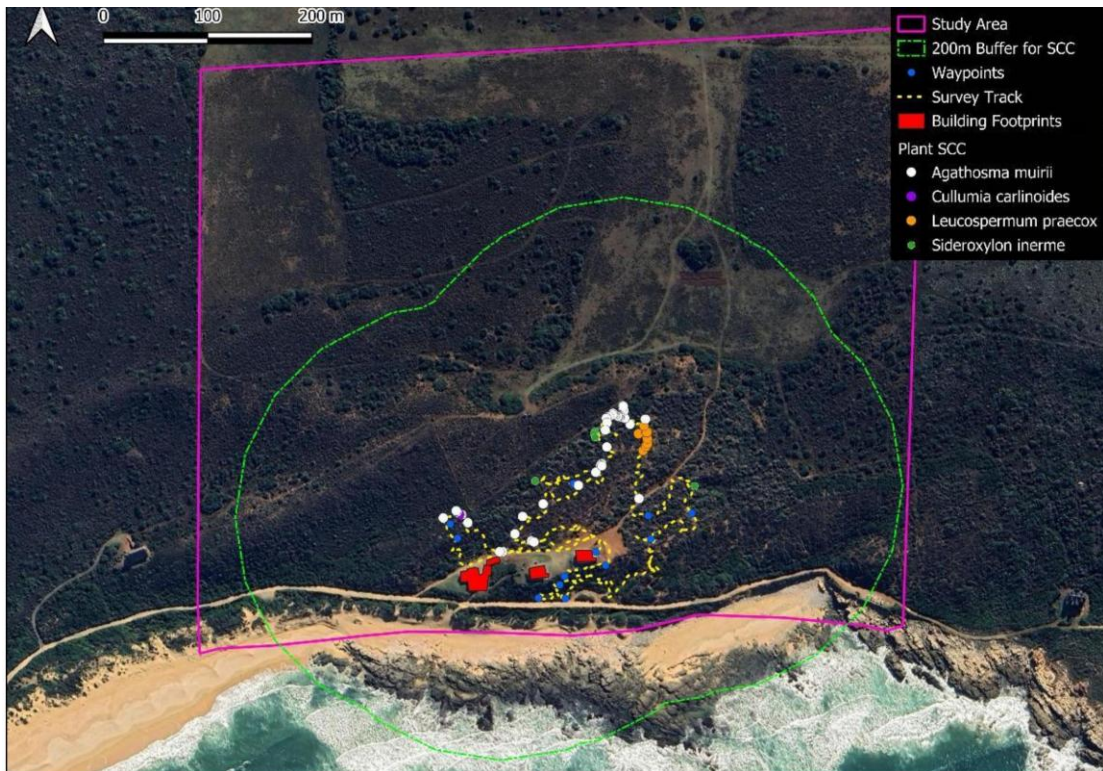


Figure 9: Map showing the location of plant and animal species of conservation concern, including the 200 m buffer for plant species, relative to the building footprints (Terrestrial Biodiversity Report compiled by Capensis).

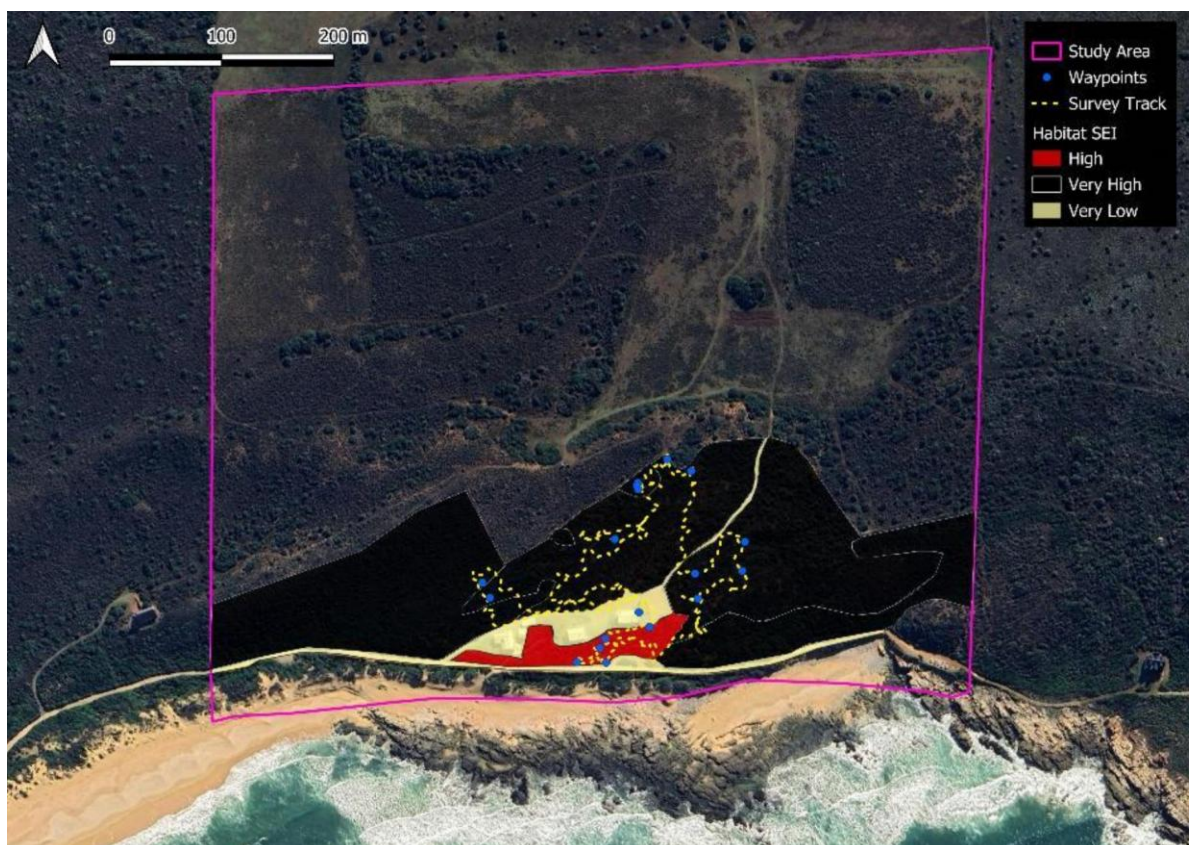


Figure 10: Map showing the Site Ecological Importance (SEI) for each habitat delineated at the site — the building footprints fall within the Very Low SEI zone, contrasted against Very High SEI habitat immediately inland (Terrestrial Biodiversity Report compiled by Capensis).

Specialist Recommendations (*verbatim* — *Terrestrial Biodiversity Report compiled by Capensis*, Section 10.5 Mitigation)

The following mitigation, rehabilitation and restoration measures are reproduced *verbatim* from the specialist terrestrial biodiversity assessment:

- Restoration of all areas disturbed by unlawful construction activities. This includes the south facing primary dune below Building 3. This is likely to require a combination of active and passive restoration interventions, depending on how well the vegetation regenerates. A restoration plan is critical to this process, requiring an initial monitoring period. This should include the following measures: Remediation of erosion furrow. Weed control and removal of Invasive Alien Plants (IAPs). Note that IAP removal is not technically mitigation since this is a legal obligation of the landowner but is mentioned here since it is integral to the restoration success. Exclusion of traffic and vehicles from the layby below Building three.
- An additional essential mitigation measure is the implementation and long-term maintenance of an appropriate ecological fire regime through well-timed prescribed burns. This will require an appropriate Fire Management Plan. It is recommended that the applicant contact the Southern Cape Fire Management Association to assist in the formulation of this plan.
- Restoration of degraded habitat upslope of the development. As the vegetation has already been cleared for construction, it is recommended that an area of degraded vegetation upslope of the buildings be restored to account for the loss of Endangered vegetation. Much of the restoration can be achieved through passive measures, allowing species from the surrounding vegetation to recolonise, however some active restoration measures may be required to augment the species assemblage and to manage the habitat to facilitate the recolonisation of the area. This will require a rehabilitation management plan compiled by a competent practitioner.
- Restriction on the movement of free ranging animals is highly advised. Free roaming cats or dogs have a highly negative effect on small faunal species. It is recommended that cats be kept indoors or in an enclosed 'Catio'. Similarly, dogs should remain on leads/restrained or kept in a fenced area to prevent hunting behaviour in the veld.
- Brush cutting and maintenance of open space should be closely managed. Pesticide (including rodenticide) is highly discouraged. Similarly, the use of herbicide should be highly restricted; the removal of *Acacia cyclops* does not require herbicide so the necessity of herbicide at the property is negligible.
- Should outdoor lighting be required, these should be fitted to timers and motion sensors and shielded/oriented in such a way that light only shines downwards. This is to limit the harmful effects of artificial light on nocturnal insects and other wildlife.

It is further recommended, verbatim, that: "It is recommended that a fire management plan be formulated, with the potential inclusion of ecological burns pending the outcome of risk assessments" (Section 10.3, Indirect Impacts).

2.2. Aquatic Sensitivities

No watercourses are mapped on the site in terms of the EIA Regulations Listing Notices of 2014, and no open water was observed during the site inspection. The screening tool nonetheless rates the Aquatic Biodiversity theme as Very High, owing to the property's proximity to the coastline and its location within the 100 m from the high-water mark.

The specialist aquatic biodiversity assessment and site sensitivity verification (BioAssets CC, 28 May 2026) records that the habitat at the site is modified, including historic cultivation and current low-impact cattle grazing, and that ongoing removal of invasive *Acacia cyclops* is contributing positively to habitat recovery. The dune slope adjacent to the proposed expansion is currently stable with minimal erosion, although regular monitoring and prompt rehabilitation of any erosion is recommended. BioAssets recommends that the sensitivity rating be adjusted to Low for the development footprint specifically, while the sensitivity of the broader coastal and marine environment is maintained at Very High to ensure its protection.



Figure 11: Aquatic sensitivities associated with Portion 118 of Farm 489

It should be noted that while no watercourses occur at the specific development footprint, both specialist reports independently identify a small channelled valley-bottom wetland (the South/Western Strandveld channelled valley-bottom wetland) mapped in the dune slack further inland on the property, associated with an Ecological Support Area 1 (ESA 1) buffer (see Figure 19, Section 2.1; BioAssets CC, 2026). This wetland is well removed from Building 3 and the proposed expansion, is not

connected hydrologically to the development footprint, and will not be affected by the development.

Specialist Mapping (Aquatic Biodiversity Report compiled by BioAssets CC)

The following mapping is extracted directly from the specialist aquatic biodiversity assessment and site sensitivity verification (Aquatic Biodiversity Report compiled by BioAssets CC).

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY

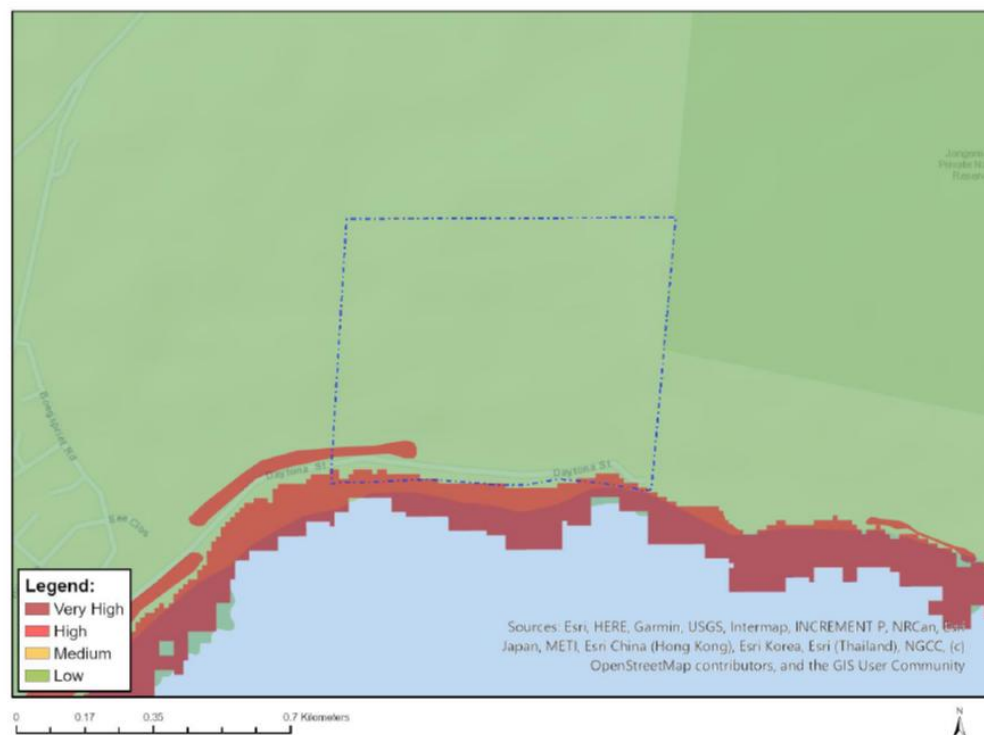


Figure 12: The Screening Tool Report map of the Aquatic Biodiversity Theme associated with the study site (Aquatic Biodiversity Report compiled by BioAssets CC).

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY

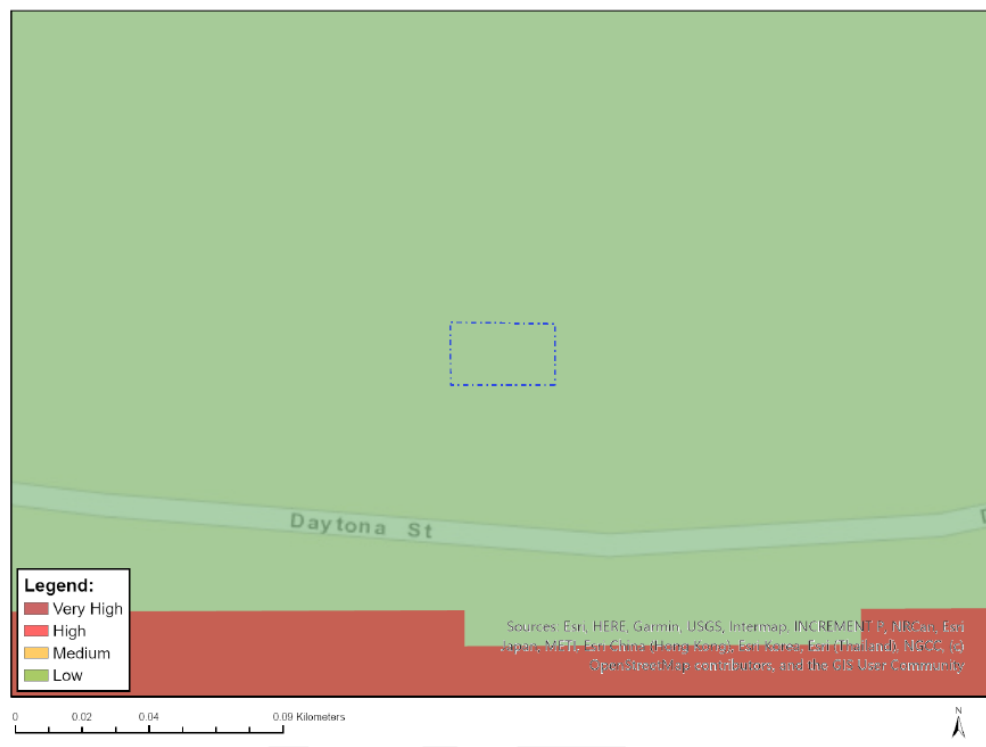


Figure 13: Screening Tool Report image showing the position of the dwelling assessed during the study, falling within the low-sensitivity footprint area (Aquatic Biodiversity Report compiled by BioAssets CC).



Figure 14: The CBA map associated with the study site, reflecting the property's proximity to Ecological Support Area 1 (Aquatic Biodiversity Report compiled by BioAssets CC).



Figure 15: The wetlands map associated with the study site, showing the South/Western Strandveld channelled valley-bottom wetland inland of the dwellings (Aquatic Biodiversity Report compiled by BioAssets CC).

Specialist Recommendations (verbatim — BioAssets CC, 2026)

The following recommendations are reproduced verbatim from the specialist aquatic biodiversity assessment:

"The jeep track used to service the water supply for the property is in a good condition and it is recommended that regular monitoring is done to ensure that no erosion occur."

"It is recommended that a 5 m zone is created from the edge of the dune slope where the vegetation must establish and maintained as this will ensure a more stable dune edge."

"It is recommended that the sewage system for the property is regularly inspected to ensure that no leakage or spilling occur... Although it has not spilled previously, regular inspections and pumping is recommended... it is recommended that the systems filtration is checked for clogging, as this will lower the effectivity of the system."

"It is recommended that the runoff rainwater is controlled to ensure even dissipation into the sand profile. This can be attained by gravel layers around downpipes from roofs and a continuous plant cover to promote dissipation of flow velocity."

"It is recommended that the sensitivity is adjusted to a low sensitivity for the development footprint only. It is important that the sensitivity for the larger area is

maintained to ensure that the receiving environment, i.e. the marine environment gets maximum protection."

"It is recommended to utilise the cleared area for the footprint of the proposed development. The continued removal of alien vegetation on the property is recommended."

2.3. Sensitive Area Consideration

The property is not situated within a formally protected area but adjoins the Jongensgat Private Nature Reserve along its eastern boundary. Under the WCBSP, the majority of the property is classified CBA 1 and a smaller portion CBA 2 – areas required to be maintained in a natural or near-natural state, with only low-impact, biodiversity-sensitive land uses considered appropriate. This designation applies to the property as a whole; the specific development footprint is addressed in Section 6 of this report.



Figure 16: Western Cape Biodiversity Spatial Plan (2023) – Sensitive Areas

2.4. Site Development Context

The property extends to 38.48 ha, of which the existing and proposed dwelling footprints occupy a combined 236 m² (0.06% of the property). Three dwellings are established within the same coastal terrace: the Existing Main Dwelling, Existing Dwelling #2, and Building 3 (subject of this application), all within 100 m from the high-water mark of the sea as shown below. Building 3 is a single-storey structure with a roof ridge height of approximately 4.9 m, consistent in scale with the existing dwellings on the property. The proposed expansion will increase Building 3 's development footprint by approximately 132 m².



Figure 17: Site layout showing the existing dwelling cluster, the Building 3 footprint and the 100 m high-water mark

3. PROPOSED DEVELOPMENT (24G RECTIFICATION AND EXPANSION)

The application addresses two components relating to the same physical structure, which are bundled into a single, integrated Section 24G application on the basis that they share the same site, the same ecological sensitivities and the same specialist study requirements:

- Rectification of the unlawful commencement of Building 3 (104.328 m²), constructed in May 2011 without Environmental Authorisation; and
- The proposed expansion of Building 3 by approximately 132 m² (comprising a sunroom, additional bedroom and covered patio), bringing the total footprint to approximately 236 m².

The proposed expansion, as reflected in the building plans prepared by S. Botha (SACAP PAT21085, July 2025, Rev. 22 July 2025), is a single-storey addition with a roof ridge height of approximately 4.9 m, built onto the existing disturbed development footprint. No alternative site layout was considered, as the expansion is confined to the immediate footprint of the existing unlawful structure and does not extend into undisturbed habitat.

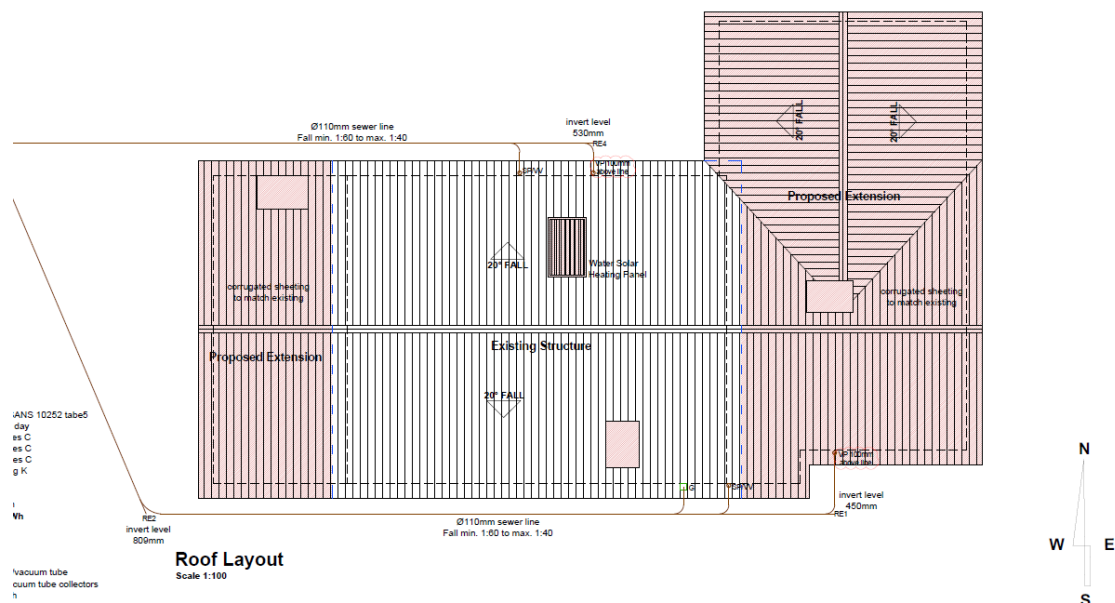


Figure 18: Site layout showing the extent of existing building vs what is proposed to be developed

4. ENVIRONMENTAL SCREENING RESULTS AND ASSESSMENT OUTCOMES

A DFFE national web-based Screening Tool Report was generated on 15 April 2026 (generated by Justin Brittion, Bluepebble Sustainable Solutions) for the application classification: Infrastructure | Localised infrastructure | Infrastructure in the Sea_Estuary_Littoral Active Zone_Development Setback_100M Inland or coastal public property.

4.1. Environmental Management Frameworks Relevant to the Application

No intersections with Environmental Management Framework areas were identified by the screening tool.

4.2. Relevant Development Incentives, Restrictions, Exclusions or Prohibitions

The screening tool flags the presence of South African Conservation Areas (SACAD) and South African Protected Areas (SAPAD) datasets in the vicinity. The property itself does not fall within the boundary of the adjoining Jongensgat Private Nature Reserve, and the Section 50(5) NEMPAA prior-approval trigger applicable to development within a nature reserve therefore does not apply; the Reserve's management authority will nonetheless be included in the Public Participation Process as a registered I&AP. DEA&DP has separately confirmed (04 March 2026) that the property, zoned Agricultural Zone I, falls outside the interim urban edge adopted on 5 March 2012 and is regarded as falling outside an urban area for the purposes of the EIA Regulations.

4.3. Proposed Development Area Environmental Sensitivity

The following summary reflects the highest environmental sensitivity identified per theme. These ratings are indicative only and are verified on site in Section 6 of this report.

Table 3: Environmental sensitivities per the DFFE screening tool report (15 April 2026)

Theme	Very High	High	Medium	Low
Agriculture		X		
Animal Species		X		
Aquatic Biodiversity	X			
Archaeological & Cultural Heritage				X
Civil Aviation		X		
Defence				X
Palaeontology			X	
Plant Species			X	
Terrestrial Biodiversity	X			

4.4. Identified Specialist Input Required

Based on the classification selected and the environmental sensitivities identified, the following specialist assessments were identified by the screening tool for inclusion in

the assessment report. Motivation for the inclusion or exclusion of each is provided in Section 6.

Table 4: Specialist assessments identified by the screening tool

No.	Specialist Assessment
1	Landscape/Visual Impact Assessment
2	Archaeological and Cultural Heritage Impact Assessment
3	Palaeontology Impact Assessment
4	Terrestrial Biodiversity Impact Assessment
5	Aquatic Biodiversity Impact Assessment
6	Marine Impact Assessment
7	Avian Impact Assessment
8	Geotechnical Assessment
9	Socio-Economic Assessment
10	Plant Species Assessment
11	Animal Species Assessment

5. SITE SENSITIVITY VERIFICATION METHODOLOGY

In terms of the Protocols, the site sensitivity verification is conducted by the EAP, informed by specialist input where specialists have been appointed. The verification process for this application comprised:

- Desktop analysis, using satellite imagery (Cape Farm Mapper, aerial photography) and the screening tool outputs, cross-referenced against the DEA&DP comment letter of 04 March 2026 and the approved and as-built building plans; and
- Site inspection, including a site visit on 28 April 2026 and dedicated specialist site assessments carried out by Capensis Ecological Consulting (terrestrial biodiversity, July 2026) and BioAssets CC (aquatic biodiversity, 28 May 2026), each of whom ground-truthed the desktop findings on site.

6. SITE SENSITIVITY VERIFICATION

The majority of the environmental sensitivities identified by the screening tool are considered an accurate reflection of site conditions and are confirmed below. Three themes – Agriculture, Civil Aviation and Palaeontology – are disputed for the development footprint specifically, for the reasons set out in Sections 6.1, 6.2 and 6.8. Sections 6.3 to 6.9 verify the remaining screening tool themes in turn.

Table 5: Site sensitivity verification of the identified environmental sensitivities

Theme	Very High	High	Medium	Low	Verification Outcome
Agriculture		X		X	Disputed – footprint only (see 6.1)
Animal Species		X			Confirmed
Aquatic Biodiversity	X				Confirmed (broader area); Low for footprint – per BioAssets SSVR
Archaeological & Cultural Heritage				X	Confirmed
Civil Aviation		X		X	Disputed (see 6.2)
Defence				X	Confirmed
Palaeontology			X		Confirmed – footprint previously disturbed
Plant Species			X		Confirmed
Terrestrial Biodiversity	X				Confirmed

6.1. Agriculture

The screening tool rates the Agriculture theme as High across the property, based on the “Rainfed Annual Crop Cultivation / Planted Pastures” classification. As shown in Figure 7, the property boundary (dashed outline) spans both the High-rated (red) zone inland and a Low-rated (green) zone along the coastal terrace where the existing dwelling cluster – including Building 3 – is situated.

The development footprint and its immediate surrounds have remained under natural coastal dune thicket vegetation and, since 2011, residential development (Photograph 3); there is no evidence, from the site inspection or from DEA&DP's own review, that this specific portion of the property has ever been under active cultivation or pasture. DEA&DP's comment letter (04 March 2026) records that the surrounding land use is “mainly agricultural zoned land with little to no agricultural activities taking place,” consistent with these site observations. On this basis, it is considered unlikely that the proposed development results in any loss of agricultural land or production potential.. It would therefore overstate the position to argue that no agricultural sensitivity exists on the property as a whole. However, DEA&DP's own review of the site (comment letter, 04 March 2026) records that the surrounding land use is “mainly agricultural zoned land with little to no agricultural activities taking place,” consistent with the specialist site observations.

The development footprint under assessment – the existing 104.328 m² Building 3 and the proposed 132 m² expansion, together 236 m² – falls within the coastal, Low-rated portion of the property, has been under residential development since 2011, and has no arable production potential. On this basis, the Agriculture theme sensitivity is disputed and considered Low for the development footprint specifically..

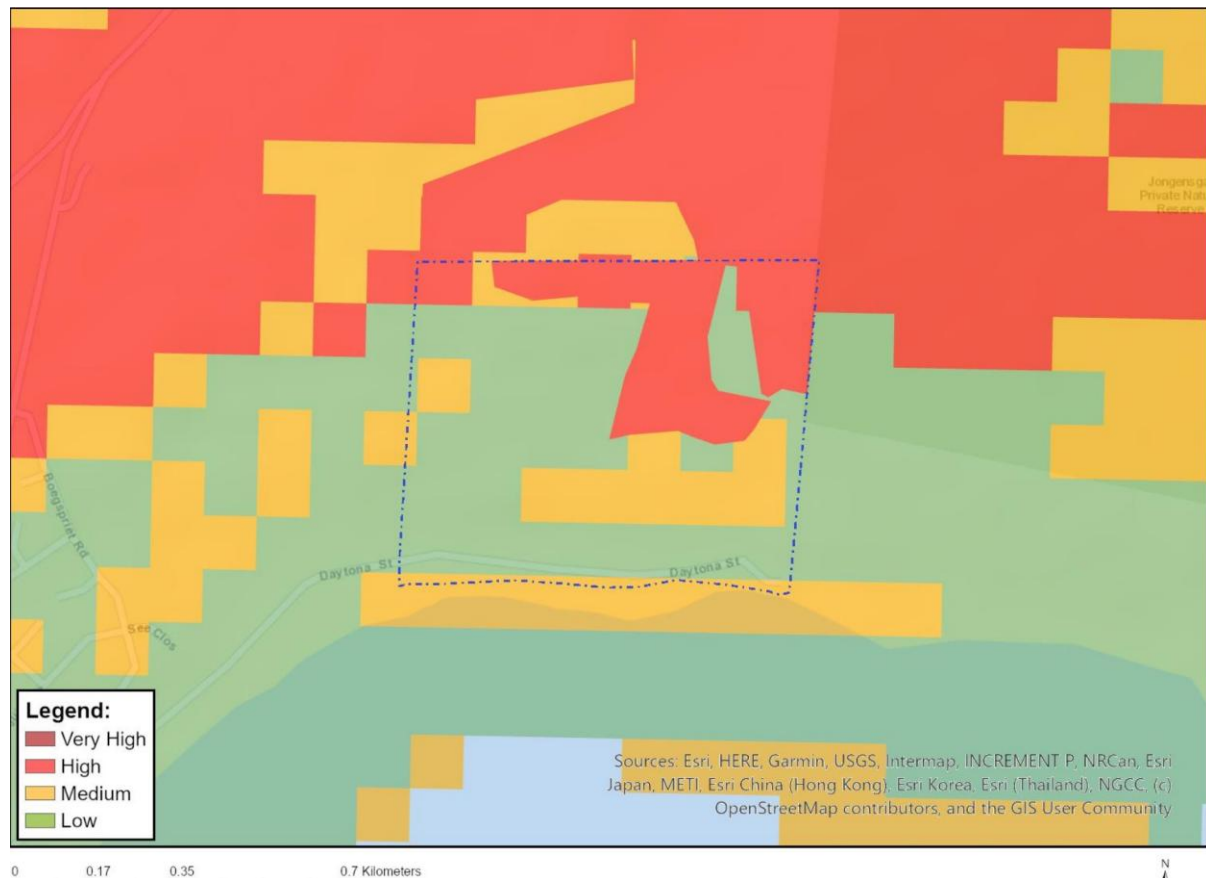


Figure 19: Map of relative Agriculture theme sensitivity, with the property boundary (dashed) spanning both High and Low-rated zones

6.2. Civil Aviation

The screening tool rates the Civil Aviation theme as High, based on the property's location within a designated area of "dangerous and restricted airspace as demarcated" (Figure 8), with a secondary Medium-rated feature relating to proximity (8–15 km) to a civil aviation aerodrome. The mapped High rating is applied uniformly across the entire coastal strip shown, including areas well beyond any conceivable influence of this application, indicating that it reflects a broad airspace management designation rather than a site-specific sensitivity to ground-based development.

The proposed expansion is a single-storey addition to an existing dwelling, with a roof ridge height of approximately 4.9 m, consistent with the two other dwellings already established on the property. A structure of this scale and height presents no reasonable likelihood of interference with restricted airspace or aerodrome operations. On this basis, the Civil Aviation theme sensitivity is disputed and considered Low for the proposed development and no further assessments will be undertaken.



Figure 20: Map of relative Civil Aviation theme sensitivity, shown as uniformly High across the surrounding coastline

6.3. Terrestrial Biodiversity

The screening tool rates the Terrestrial Biodiversity theme Very High, reflecting the property's location within Endangered Hartenbos Dune Thicket and Critical Biodiversity Area 1 (CBA1). This rating is confirmed by the specialist terrestrial biodiversity assessment (Capensis Ecological Consulting, July 2026), which independently mapped the site at a finer scale and found intact, semi-intact and transformed habitat within the study area, with the development footprint situated within a Very Low Site Ecological Importance (SEI) zone relative to the surrounding Very High SEI habitat. See Section 2.1 (Figures 4 to 10) for the full specialist mapping and verbatim mitigation recommendations, which are carried into the EMPr.

6.4. Plant Species

The screening tool rates the Plant Species theme Medium. The specialist terrestrial biodiversity assessment recorded three plant species of conservation concern and one protected tree species within the study area, none of which fall within the development footprint (see Section 2.1, Figure 9). The Medium rating is confirmed for the property as a whole; the specialist's mitigation recommendations (Section 2.1) are carried into the EMPr.

6.5. Animal Species

The screening tool rates the Animal Species theme High. The specialist terrestrial biodiversity assessment identified the habitat as potentially supporting three animal species of conservation concern (see Section 2.1). The High rating is confirmed; the specialist's recommendations on restricting free-ranging domestic animals and managing outdoor lighting (Section 2.1) are carried into the EMPr.

6.6. Aquatic Biodiversity

The screening tool rates the Aquatic Biodiversity theme Very High, based on the property's coastal proximity. This is confirmed for the broader 38.48 ha portion by the specialist aquatic biodiversity assessment and site sensitivity verification (BioAssets CC, 28 May 2026), which independently mapped a small seep wetland in the dune slack inland of the property and a channelled valley-bottom wetland further inland (see Section 2.2, Figures 11 to 15). The specialist SSVR recommends the sensitivity be adjusted to Low for the development footprint specifically, as the footprint does not intersect any mapped watercourse and has already been cleared; this footprint-specific adjustment is adopted, and the specialist's verbatim recommendations (Section 2.2) are carried into the EMPr.

6.7. Archaeological and Cultural Heritage

The screening tool rates the Archaeological and Cultural Heritage theme Low. No heritage features, structures or artefacts were observed during the site inspection, and the development footprint is confined to previously disturbed ground associated with the existing Building 3. The Low rating is confirmed; a Notice of Intent to Develop will nonetheless be lodged with Heritage Western Cape as part of this application.

6.8. Palaeontology

The screening tool rates the Palaeontology theme Medium. The development footprint has been previously disturbed by the 2011 construction of Building 3, and the proposed expansion involves standard residential foundations with no abnormal deep excavation. On this basis, the theme sensitivity is disputed and considered Low for the development footprint specifically; should any fossil material be exposed during construction, work will stop and Heritage Western Cape will be notified in accordance with standard chance-find protocol.

6.9. Defence

The screening tool rates the Defence theme Low. No defence-related restrictions, installations or sensitivities were identified for the property. The Low rating is confirmed.

6.10. Specialist Input Verification

In addition to verifying the sensitivity ratings above, and in terms of the Protocols, the EAP provides reasons below for the inclusion or exclusion of each specialist assessment identified by the screening tool (Table 4).

Table 6: Verification of specialist input related to the proposed development

Specialist Assessment	Motivation	Status
Landscape/Visual Impact Assessment	The expansion is confined to the existing disturbed footprint of Building 3, is single-storey, and matches the scale and roof form of the two other established dwellings on the property. Visual impact is assessed as low and localised.	Disputed

Specialist Assessment	Motivation	Status
Archaeological and Cultural Heritage Impact Assessment	The screening tool rates this theme Low. No heritage features were observed during the site inspection, and the footprint is confined to previously disturbed ground. A Notice of Intent to Develop will nonetheless be lodged with Heritage Western Cape as part of this application; a dedicated specialist study is not considered necessary unless Heritage Western Cape directs otherwise.	Disputed
Palaeontology Impact Assessment	The screening tool rates this theme Medium. The development footprint has been previously disturbed by the 2011 construction, and no new or abnormal deep excavation is proposed beyond standard residential foundations.	Disputed
Terrestrial Biodiversity Impact Assessment	The screening tool rates this theme Very High (Endangered Hartenbos Dune Thicket, CBA1/2). Capensis Ecological Consulting was appointed to assess terrestrial biodiversity, including impacts of the 2011 clearance and the proposed expansion.	Commenced (Report dated July 2026)
Aquatic Biodiversity Impact Assessment	The screening tool rates this theme Very High due to coastal proximity. BioAssets CC was appointed to conduct the aquatic biodiversity assessment and site sensitivity verification.	Commenced (Report dated 28 May 2026)
Marine Impact Assessment	The proposed works are entirely landward of the high-water mark and involve no direct works to the marine or intertidal environment. The BioAssets aquatic assessment addresses coastal-proximity implications; a discrete marine impact assessment is not considered necessary.	Disputed
Avian Impact Assessment	Avifauna, including species of conservation concern (<i>Circus maurus</i> , <i>Afrotis afra</i>), were assessed as part of the Capensis terrestrial biodiversity and animal species assessment. A separate, discrete avian specialist study is not considered necessary.	Addressed within Terrestrial Biodiversity / Animal Species Assessment
Geotechnical Assessment	The expansion will be founded on standard strip foundations within the existing, previously disturbed development footprint; both specialist site inspections independently recorded the adjacent dune slope as currently stable with minimal erosion. No abnormal excavation is proposed. Foundation design will be certified by the project engineer as part of the municipal building plan process; should the Competent Authority require a dedicated geotechnical assessment, this will be sourced and the application updated accordingly.	Disputed
Socio-Economic Assessment	The application relates to a single private residential dwelling expansion of 132 m ² . Given the minor scale and residential character of the development, no material change to the socio-economic circumstances of the surrounding area is anticipated.	Disputed
Plant Species Assessment	The screening tool rates this theme Medium, with multiple sensitive species records. Assessed by Capensis Ecological Consulting as part of the	Commenced (Report dated July 2026)

Specialist Assessment	Motivation	Status
	terrestrial biodiversity assessment (three plant SCC and one protected tree species identified).	
Animal Species Assessment	The screening tool rates this theme High. Assessed by Capensis Ecological Consulting as part of the terrestrial biodiversity assessment (three potential animal SCC identified).	Commenced (Report dated July 2026)

6.11. Photographic Evidence



Photograph 1: Building 3 (foreground) and the existing dwelling cluster, viewed from the coastal terrace



Photograph 2: Building 3 sited close to the rocky shoreline, within the 100 m high-water mark zone



Photograph 3: Coastal dune thicket vegetation adjoining the developed footprint, looking east along the shoreline



Photograph 4: Roof works to Building 3 in progress, confirming the development is confined to the existing disturbed footprint



Photograph 5: Stormwater downpipe detail at the base of Building 3, relevant to erosion and dune-stability management

7. CONCLUSION

Having considered the environmental sensitivities identified by the screening tool report and verified them against specialist input, site inspection and desktop analysis, this report motivates the retention of four specialist assessments and the exclusion of the remaining seven, for the reasons set out in Section 6. The Agriculture and Civil Aviation theme ratings are disputed for the development footprint specifically, without disturbing the ratings applicable to the balance of the property or the broader receiving environment.

Table 7: Summary of specialist input retained for this application

No.	Specialist Assessment	Specialist	Status
4	Terrestrial Biodiversity Impact Assessment	Capensis Ecological Consulting	Commenced – July 2026
5	Aquatic Biodiversity Impact Assessment	BioAssets CC	Commenced – 28 May 2026
10	Plant Species Assessment	Capensis Ecological Consulting	Commenced – July 2026
11	Animal Species Assessment	Capensis Ecological Consulting	Commenced – July 2026