



30 April 2025

Our Ref: MOS786/03a

DEA&DP Ref: 14/2/4/2/3/D6/17/0017/25

**RE: UPDATED SITE SENSITIVITY VERIFICATION REPORT FOR SEEBEDERFIE ON ERF 4735,
GREAT BRAK RIVER, MOSSEL BAY**

On 20 March 2020 the Minister of Forestry, Fisheries and the Environmental 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 by either an **EAP or a specialist**.

The report uses national datasets to identify site sensitivities and potential specialist studies that may be required for any particular development. Since the datasets are not necessarily ground-truthed, there may be instances where the required specialist study is in fact not necessary.

Prior to commencing with a specialist assessment, the **current use of the land** [must be verified] and the environmental sensitivity of the site under consideration identified by the screening tool [must be verified] by undertaking a **site sensitivity verification (SSV)**.

According to the Assessment Protocol for specialist involvement, if any part of the proposed development falls within an area of 'high' or 'very high' sensitivity, the requirements prescribed for such sensitivity must be followed.

1. The SSV must be undertaken by an **EAP or a specialist**.
 - The site sensitivity verification report has been compiled by the EAP.
2. A preliminary on-site inspection must be undertaken.
 - Site inspection was undertaken by the EAP.
3. A desktop analysis, using satellite imagery, must be undertaken, alongside any other applicable/ relevant information.
 - Consideration has been given to the Mossel Bay GIS Viewer, Cape Farm Mapper spatial layers, Google Earth and Specialists' Site Sensitivity Verification Reports.

1. General Site Information

Erf 4735 is situated in Great Brak River, between Tergniet and Southern Cross, south of the R102 (Mossel Bay Municipality, Western Cape Province) (Figure 1). The property is approximately 9373.3m² in size, zoned Agriculture I and is outside the urban edge of Mossel Bay. A main dwelling was constructed on the property and used as a guesthouse called “Seebederfie”.

Inspectors from DEA&DP: Environmental Law Enforcement conducted a site inspection on 10 August 2022. It was confirmed that the Applicant commenced with the unlawful clearance of endangered indigenous vegetation, flattening of the frontal dune, and moving of 5m³ of soil within the 100m high-water mark of the sea without prior Environmental Authorisation. A Pre-Compliance Notice was issued on 29 September 2022 (Ref: 14/1/1/E3/9/10/3/L1248/22).

The Applicant removed indigenous vegetation to create a parking area in front of the dwelling and three (3) guest rooms next to the dwelling (Figure 2). The Applicant also removed indigenous vegetation for a bonfire area with a wooden staircase within the 100m high-water mark of the sea (Figure 3). In addition to the above, the Applicant planted 14 x poles, as part of the idea to put up a marque tent, within the 100m high-water mark of the sea.



Figure 1: Locality Map of Erf 2735 (red outlined area) (CapeFarmMapper, 2023).

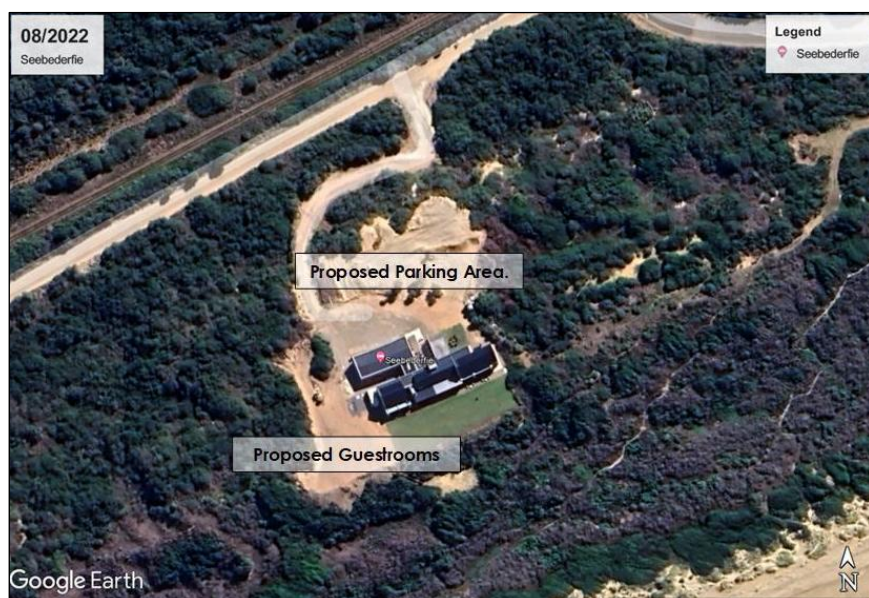


Figure 2: Clearance of indigenous vegetation for the proposed parking area, proposed three (3) guestrooms and wooden staircase leading to a bonfire area.



Figure 3: The Applicant removed indigenous vegetation to create a bonfire area (left photograph) and a wooden staircase (right photograph).

The Applicant is now proceeding with a 24G Application process to build two (2) guest rooms on ground level abutting the two western guest rooms (Figure 4). The areas around the proposed guest rooms will be rehabilitated with indigenous vegetation along with the proposed parking area.

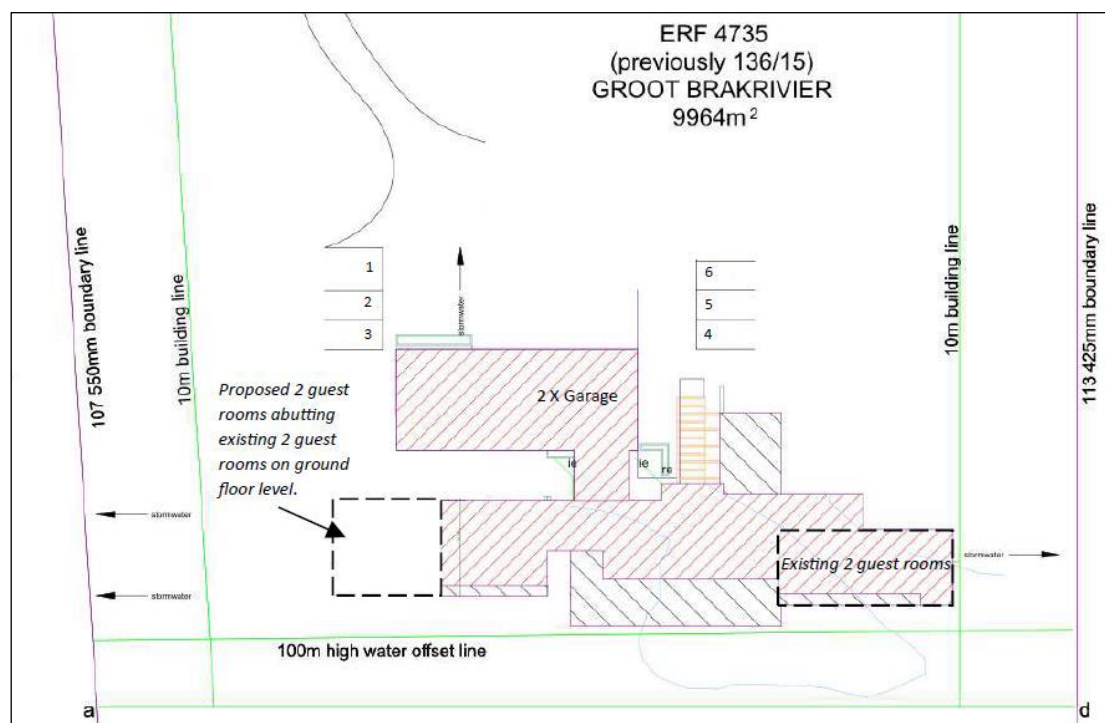


Figure 4: Conceptual Site Development Plan (source: Marlize de Bruyn Planning).

2. Screening Tool Results

According to the Screening Tool Report that was run on **27 January 2025**, the following summary of the development footprint environmental sensitivities is identified (Table 1):

Table 1: Summary of the development footprint environmental sensitivities.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme				X
Civil Aviation Theme			X	
Defence Theme				X
Paleontology Theme			X	
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

Below is confirmation of the studies required for the Application based on the sensitivity themes identified above.

2.1. Agriculture (High Sensitivity)

The Screening Tool identifies the agricultural sensitivity theme as “high” (Figure 5).

As seen in the figure below, only the north-eastern section of the property has a high agricultural sensitivity. Most of the property, including the areas of the proposed two (2) guestrooms and parking area, has a medium sensitivity. Nonetheless, the site has never been used for agricultural purposes. It is largely surrounded by non-agricultural land uses, has a lack of cropping infrastructure and inputs (water supply), and most of the property is already developed.

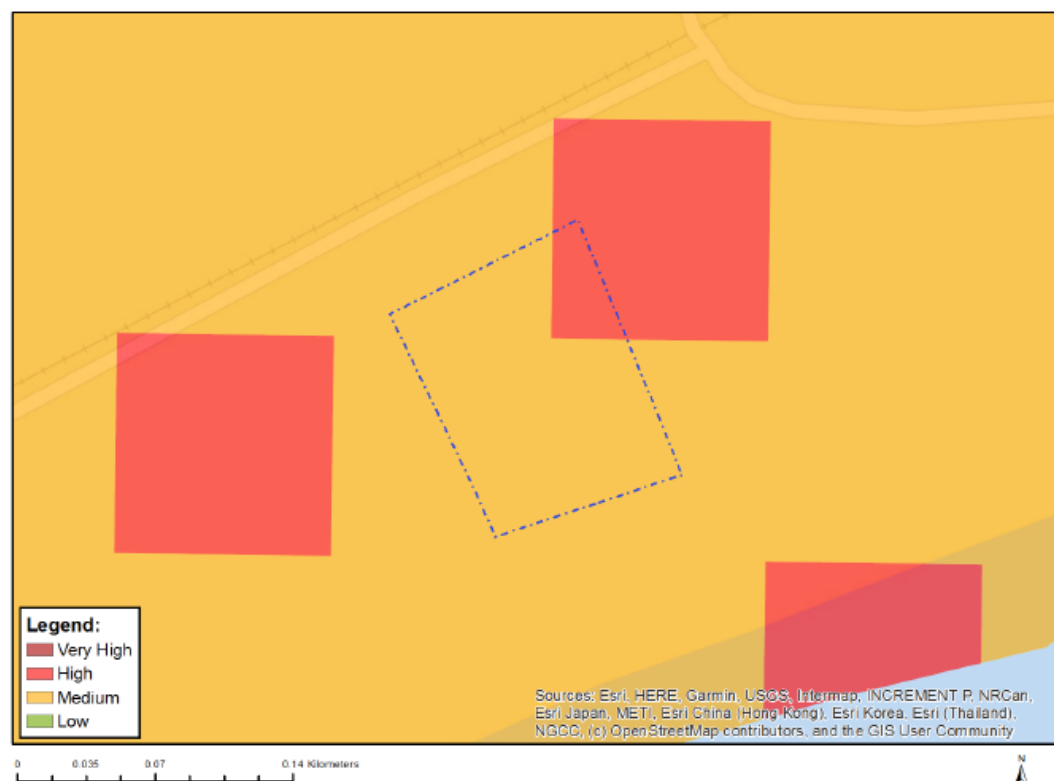


Figure 5: Image from Screening Tool identifying agricultural theme sensitivity for the property.

The property is not a viable agricultural unit and the sensitivity is therefore refuted by the EAP. The impact on agricultural resources is therefore deemed to be insignificant. It is therefore the opinion of the EAP that **no Agricultural study** is required.

The **Department of Agriculture** will be approached for comment during the Public Participation process.

2.2. Animal Species (High Sensitivity)

The screening tool identifies the sensitivity for animal species (fauna) as “high” (Figure 5) for the following species (Table 2):

Table 2: Animal Species Sensitivity Features.

Sensitivity	Feature(s)
High	Aves-Circus ranivorus
High	Aves-Bradypterus sylvaticus
Medium	Insecta-Aloeides thyra orientis
Medium	Insecta-Lepidochrysops littoralis
Medium	Sensitive species 8
Medium	Invertebrate-Aneuryphymus montanus

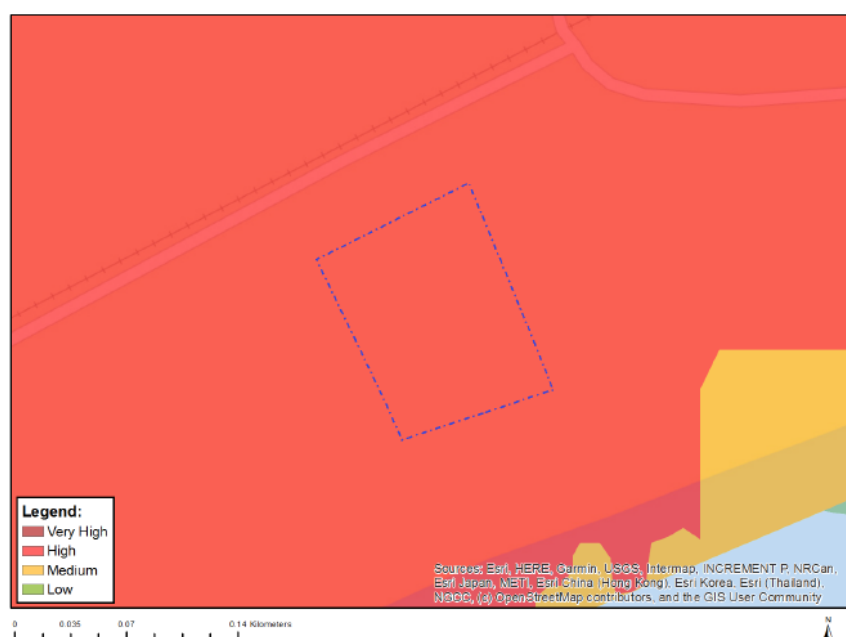


Figure 6: Image from Screening Tool identifying agricultural theme sensitivity for the property.

A fauna specialist compiled a Site Sensitivity Verification Report and confirmed that the commenced with activities did not impact on any fauna SCC. No fauna SCC were found on the site and has a very low likelihood of occurrence. The addition of two (2) guestrooms is also unlikely to have an impact on fauna SCC.

The fauna specialist disputes the high fauna sensitivity and confirms that the site has an overall low sensitivity. A **Fauna Compliance Statement** is submitted with the S24G Application.

Cape Nature will be approached for comment during the Public Participation Process.

2.3. Aquatic Biodiversity (Very High Sensitivity)

The screening tool identifies the aquatic biodiversity theme as “very high” (Figure 6). According to CapeFarmMapper (2023), there are no watercourses on the property. A small portion of the property’s northern boundary is within an Aquatic Ecological Support Area 1. This area is described as a coastal corridor. It is an area not essential for meeting biodiversity targets but plays an important role in supporting the functioning of Protected Areas or Critical Biodiversity Areas and are often vital for delivering ecosystem services. Most of the property has a low Aquatic sensitivity.

Since the disturbed area is not within the ESA1: Aquatic area, it is the opinion of the EAP that the activity did not impact on any aquatic features. The EAP disputes the very high sensitivity and confirms that it should be Low. Nonetheless, Dr James Dabrowski (Aquatic Specialist) compiled a Site Sensitivity Verification Report (SSVR) and confirmed that the commenced with activities has not impacted on any freshwater biodiversity and that the sensitivity of aquatic biodiversity on the property is **Low**. The proposed two (2) additional guestrooms will also not impact on any freshwater biodiversity. An **Aquatic Compliance Statement** is submitted with the S24G Application.

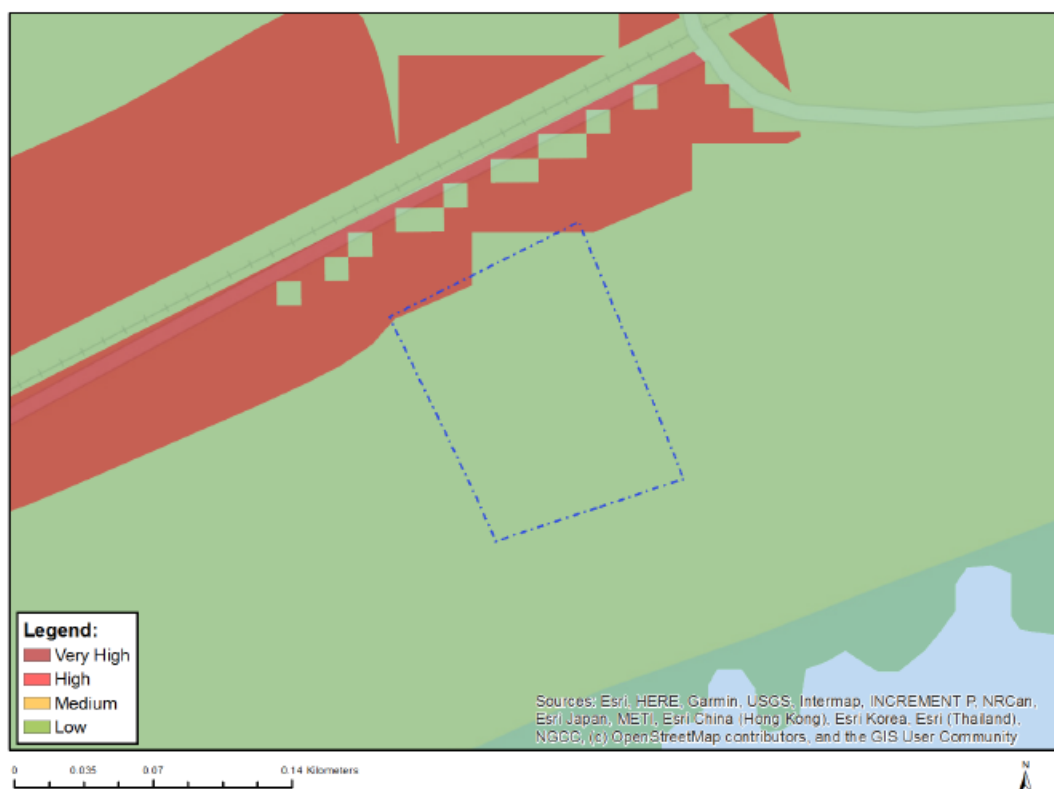


Figure 7: Image from Screening Tool identifying aquatic theme sensitivity for the property.

BOCMA will be approached for comment during the Public Participation Process.

2.4. Archaeological & Cultural Heritage (Low Sensitivity)

The screening tool identifies this theme as being “low” (Figure 8).

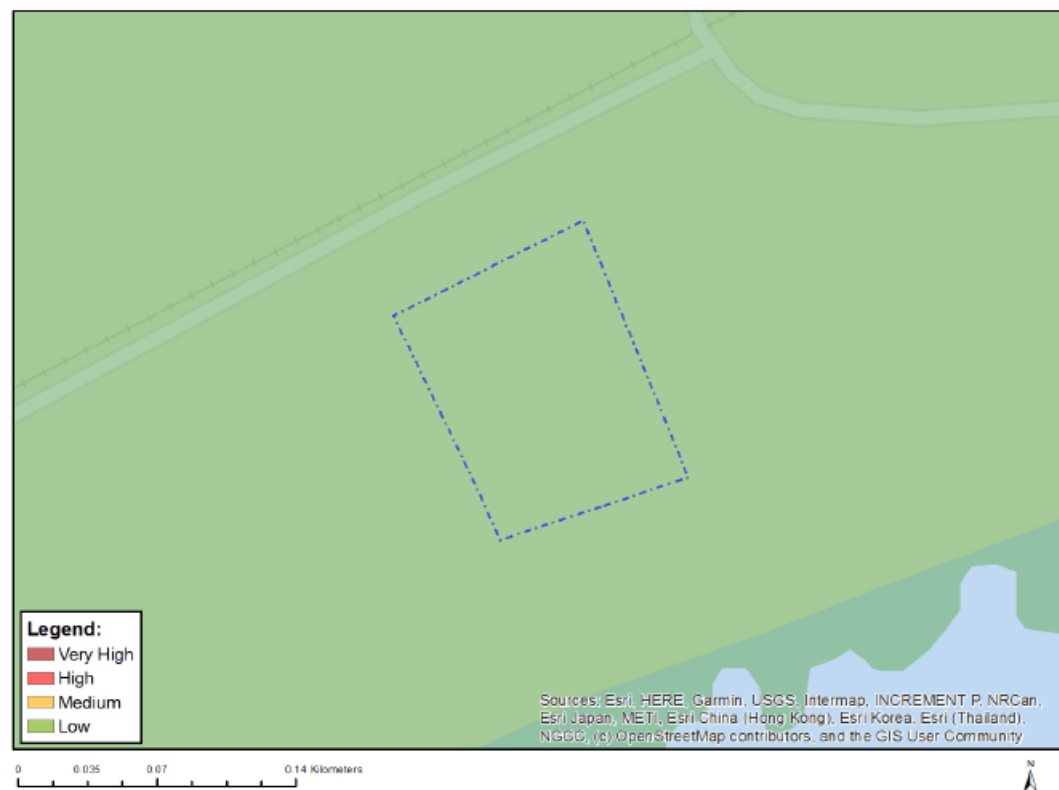


Figure 8: Image from Screening Tool identifying Archaeological & Cultural Heritage theme sensitivity for the property.

The site is located along the coast which is generally deemed to have potential for heritage/archaeological artifacts. Site clearance exposed soils and based on the EAPs inspection of the property there is no evidence of typical features such as shell middens. It is unlikely that the clearance of vegetation and subsequent construction resulted in any negative impact on heritage/archaeological features.

According to the heritage specialist, the unauthorised & proposed works do not trigger any of the development activities listed in terms of Section 38(1) of the National Heritage Resources Act, 1999 (Act 25 of 1999) (“NHRA”). The specialist compiled a letter of Applicability of Section 38(1) of the National Heritage Resources Act, 1999 (Act 25 of 1999). This letter is submitted with the S24G Application.

Heritage Western Cape will be approached for comment during the Public Participation Process.

2.5. Civil Aviation (Medium Sensitivity)

The screening tool identifies this theme as “medium”.

The development will not trigger the obstacle collision / potential hazard requirements as set out by the CAA, i.e.

- Buildings or other objects which will constitute an obstruction or potential hazard to aircraft moving in the navigable air space in the vicinity of an aerodrome, or navigation aid, or which will adversely affect the performance of the radio navigation or instrument landing systems,
- There are no buildings or objects higher than 45 meters above the mean level of the landing area;

- No building, structure or object that projects above a slope of 1 in 20 and which is within 3000 meters measured from the nearest point on the boundary of an aerodrome;
- No building, structure or other objects which will project above the approach, transitional or horizontal surfaces of an aerodrome.

The property is located far from the closest airport and is situated in an area that is developed with similar type structures i.e., homes/dwellings. The activity did not negatively impact on any civil aviation regulations.

The sensitivity rating is **refuted** and the EAP is of the opinion that the theme is **not applicable** to this application. Since there is no provision in the Protocols for 'not applicable' the lowest possible rating level of Low remains. There are no reasonable grounds for any specialist studies to confirm this and no need for consultation with SACAA on this matter.

2.6. Defence (Low Sensitivity)

The screening tool identifies this theme as being "low".

The property is located far from the closest military base and is situated in an area that is developed with similar type structures i.e., homes/dwellings. The activity did not negatively impact on any military activities or regulations.

The EAP is of the opinion that the theme is **not applicable** to this application. Since there is no provision in the Protocols for 'not applicable' the lowest possible rating level of **Low** remains. There are no reasonable grounds to conduct any specialists' studies to affirm this and further consultation with the Department of Defense is not necessary.

2.7. Palaeontology (Medium)

The screening tool identified this theme as being "Medium" (Figure 9).

According to the heritage specialist, the unauthorised & proposed works do not trigger any of the development activities listed in terms of Section 38(1) of the National Heritage Resources Act, 1999 (Act 25 of 1999) ("NHRA"). The specialist compiled a letter of Applicability of Section 38(1) of the National Heritage Resources Act, 1999 (Act 25 of 1999). This letter is submitted with the S24G Application.

Heritage Western Cape will be consulted with.

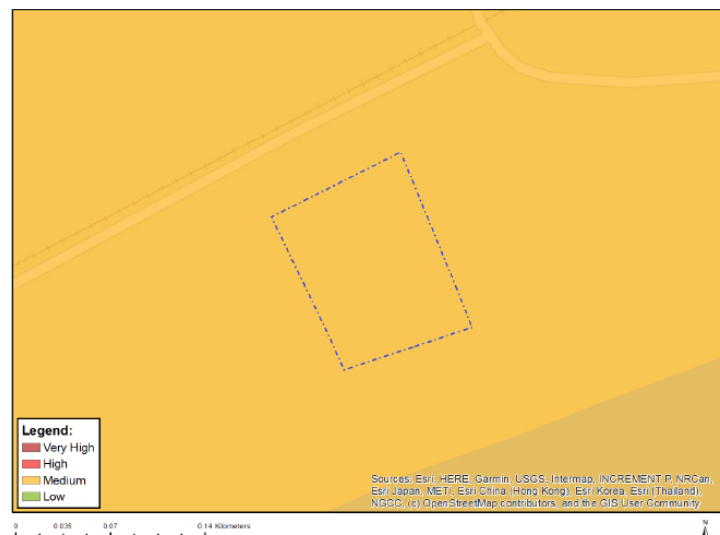


Figure 9: Image from Screening Tool identifying Paleontology theme sensitivity for the property.

2.8. Plant Species (Medium Sensitivity) and Terrestrial Biodiversity (Very High Sensitivity)

The screening tool identifies the Plant Species theme as “Medium” for the following species (Table 3):

Table 3: Plant species sensitivity features.

Sensitivity	Feature(s)
Medium	<i>Lampranthus fergusoniae</i>
Medium	<i>Lampranthus pauciflorus</i>
Medium	<i>Lebeckia gracilis</i>
Medium	<i>Leucospermum praecox</i>
Medium	<i>Wahlenbergia polyantha</i>
Medium	<i>Selago villicaulis</i>
Medium	<i>Erica unicolor</i> subsp. <i>mutica</i>
Medium	<i>Erica glandulosa</i> subsp. <i>fourcadei</i>
Medium	<i>Hermannia lavandulifolia</i>
Medium	Sensitive species 153
Medium	Sensitive species 268
Medium	<i>Duvalia immaculata</i>
Medium	<i>Agathosma eriantha</i>
Medium	<i>Agathosma muirii</i>
Medium	<i>Euchaetis albertiniana</i>
Medium	<i>Muraltia knysnaensis</i>
Medium	<i>Nanobubon hypogaeum</i>
Medium	Sensitive species 516
Medium	Sensitive species 800
Medium	Sensitive species 500
Medium	Sensitive species 654
Medium	<i>Agathosma microcarpa</i>

The screening tool identifies the Terrestrial Biodiversity theme as “very high” for the following features (Table 4):

Table 4: Terrestrial Biodiversity Sensitivity Features.

Sensitivity	Feature(s)
Very High	ESA 1
Very High	CBA 1: Forest
Very High	CBA 1: Terrestrial
Very High	EN Hartenbos Dune Thicket

The removal of vegetation that occurred did result in fragmentation of habitat, potential destruction of protected trees, as well as encroachment onto the frontal dune area. The loss of habitat and vegetation can be mitigated by rehabilitation of areas that will not be developed as well as the planting of additional protected trees to compensate for the potential loss of protected trees when the vegetation was cleared.

A botanical/biodiversity specialist confirmed the very high biodiversity sensitivity due to the presence of an endangered ecosystem and the fact that the site is included largely as an ESA1. However, the specialist disputes the medium botanical sensitivity and confirmed that it is low as no plant SCC were found on the site, or in the surrounding vegetation. A **Botanical/Biodiversity Impact Assessment** is submitted with the S24G Application.

CapeNature will be approached for comment during the public participation process.

3. Specialist Assessments

It is important to note that specialist involvement is needed when the environment could be **significantly affected** by the proposed activity, where that environment is **valued by, or important** to **society** and/or where there is **insufficient information** to determine whether impacts would be significant.

The scope of specialists' contribution (if required) depends on the **nature of the project**, the environmental context [of the site] and the amount of available information (CapeFarmMapper, SANBI datasets, input from aquatic specialists, Screening Tool), and does not always entail detailed studies or assessment of impacts (*Source: Guideline for the review of specialist input in EIA processes, 2005*).

Based on the selected classification and broad environmental sensitivities of the development footprint, the following list of is a summary by the EAP on the studies identified by the Screening Tool:

1. Landscape/Visual Impact Assessment

The development is similar to the surrounding development. There are no triggers justifying a visual impact assessment for the application.

The EAP is of the opinion that a VIA is not a requirement for the purposes of this application.

2. Archaeological and Cultural Heritage Impact Assessment

The specialist compiled a letter of Applicability of Section 38(1) of the National Heritage Resources Act, 1999 (Act 25 of 1999). The letter is submitted with the S24G Application.

3. Palaeontology Impact Assessment

The specialist compiled a letter of Applicability of Section 38(1) of the National Heritage Resources Act, 1999 (Act 25 of 1999). The letter is submitted with the S24G Application.

4. Terrestrial Biodiversity Impact Assessment

A Botanical/Biodiversity Impact Assessment is submitted with the S24G Application. The specialist confirms the very high biodiversity sensitivity. However, confirmed a low botanical sensitivity as no plant SCC were found on site and also have a low likelihood of occurrence.

5. Aquatic Biodiversity Impact Assessment

No watercourses were observed on the property. An Aquatic Compliance Statement is submitted with the S24G Application since the aquatic specialist confirmed a low aquatic sensitivity.

6. Socio-Economic Assessment

A Socio-Economic Assessment study is not deemed necessary for the scale of the proposed development.

No further studies are required in this discipline.

7. Plant Species Assessment

A Botanical/Biodiversity Impact Assessment is submitted with the S24G Application. The specialist confirms the very high biodiversity sensitivity. However, confirmed a low botanical sensitivity as no plant SCC were found on site and also have a low likelihood of occurrence.

8. Animal Species Assessment

A Fauna Compliance Statement is submitted with the S24G Application. No fauna SCC were found on the site and has a very low likelihood of occurrence. The addition of two (2) guestrooms is also unlikely to have an impact on fauna SCC.

The site verification per theme as provided above motivates that the following assessments/studies will be undertaken:

1. Botanical/Biodiversity Impact Assessment.
2. Animal / Faunal Species Compliance Statement
3. Aquatic Compliance Statement
4. Applicability of NHRA