



24G Application: 14/2/4/2/2/E2/1/0019/24

ADMINISTRATIVE FINE NOTICE

The Owner
69 Spitfire Avenue
BETTY'S BAY
0157

Email: chantales@citadel.co.za

Attention: Jacques Dumont Smit

ADMINISTRATIVE FINE IN TERMS OF SECTION 24G OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT 107 OF 1998) ("NEMA"): THE UNLAWFUL CLEARANCE OF INDIGENOUS VEGETATION ON ERF 5629 BETTY'S BAY

1. Your application in terms of section 24G of the NEMA ("the section 24G application") dated 15 November 2024 has reference.
2. In order for the Department to process your application, you are required to pay an administrative fine of **R25 000 (Twenty-five thousand rand)**.
3. The above administrative fine is determined by the type of activity or activities undertaken and the impact or impacts it has on the environment.
4. Please note that the continued operation, conduct or undertaking of the activity or activities will remain unlawful and should an environmental authorisation be issued at the conclusion of the section 24G application process, it shall only take effect from the date on which it has been issued.

5. Please note that in terms of section 24G(4) of the NEMA you must pay the administrative fine **before** the competent authority may consider your report and thereafter issue or refuse an environmental authorisation.

Notification of the administrative fine decision

6. The applicant must in writing, within 14 days of the date of the administrative fine decision ("the decision") –
- 6.1. notify all registered interested and affected parties ("I&APs") of –
 - 6.1.1. the amount of the administrative fine;
 - 6.1.2. the reasons for the decision as detailed in Annexure A; and
 - 6.1.3. the date of the decision;
 - 6.2. draw the attention of all registered I&APs to the manner in which they may access the decision; and
 - 6.3. provide the details of all registered I&APs (postal and/ physical address, contact number, facsimile and e-mail address) to all registered I&APs and the original decision-maker in the event that an appeal has been lodged in terms of the *National Appeal Regulations, 2025*.

Method of payment of the administrative fine

7. Please be advised that payment of the above administrative fine may be made by electronic transfer in the following manner:

Electronic Transfer

An electronic transfer may be made to the following bank account:

Name of Bank	:	NEDBANK
Name of Account	:	Provincial Government of the Western Cape: Department of Environmental Affairs and Development Planning
Account Type	:	Current Account
Account Number	:	1452 045 003
Branch Name	:	NEDBANK CORPORATE
Branch Code	:	145 209
Reference No.	:	S24G00379

8. Kindly forward a copy of **the proof of payment** (e.g. receipt, deposit slip, electronic transfer confirmation) to the Department and quote the abovementioned reference number to ensure that the Department may acknowledge payment of the administrative fine.
9. This proof of payment must also be accompanied by proof that the abovementioned administrative fine was brought to the attention of registered I&APs as required in paragraph 6 above.
10. The fine must be **paid within 30 (thirty) calendar days** from the date of this letter. **If no such payment is received** within the specified timeframe and no appeal has been lodged with the appeal administrator, **the said section 24G NEMA Application has lapsed. The matter to be referred for criminal investigation.**
11. You may apply for extension of the 30 (thirty) day period for payment of the administrative fine. Such request for extension must **fall within** the stipulated **30-day period. The request for extension must be supported by the following representation:**
 - 13.1. your financial circumstances, including financial disclosures;
 - 13.2. an indication of monthly instalments (if any) within a specified time period for full payment of the administrative fine; and
 - 13.3. any additional information you deem necessary to support your request for payment extension.
12. When applying for extension of payment of the administrative fine, the competent authority **may direct the ceasing of the activities being applied for** until such time that the section 24G NEMA Administrative Fine has been paid in full.
13. Should an extension for payment be granted and the administrative fine is not paid within the latest specified time period, **the section 24G NEMA Application lapses, and any partial amounts paid to the competent authority will not be refunded to the applicant.**
14. The Department may proceed with appropriate criminal investigative action which may result in criminal prosecution.
15. Please be advised that the notice of payment of the administrative fine is **not an authorisation** for the consequences of unlawful commencement of a listed activity/ies according to the NEMA.

16. Further consideration of your application will only continue upon receipt and acknowledgement of payment of the administrative fine.

Appeals

Appeals must comply the National Appeal Regulations, 2025 (Government Notice No. R. 5985 in Government Gazette No. 52269 of 13 March 2025. Please note the provisions of Regulation 1(2) & (3) of the National Appeal Regulations, 2025 when calculating the period of days.

17. Should an appeal be lodged with the appeal administrator against the administrative fine, you are hereby advised of the following:

17.1. An appellant (if the applicant) must –

17.1.1. submit an appeal to the Appeal Administrator, any registered Interested and Affected Parties (I&AP's) and the decision maker (Competent Authority who issued the decision) within **20 calendar days** from the date this decision was sent by the decision maker

17.2. An appellant (if NOT the applicant) must –

17.2.1. submit an appeal to the Appeal Administrator, the holder (applicant) of the decision and the decision maker within **20 calendar days** from the date this decision was sent to the registered I&AP's by the holder (applicant) of the decision.

17.3. All appeals submitted must:

- a) be in writing in the appeal form obtainable from the Departmental website;
- b) include supporting documents referred to in the appeal; and
- c) include proof of payment of the prescribed non-refundable appeal fee, if prescribed.

17.4. The holder (applicant) of the decision must:

- a) notify registered I&AP's and affected organs of state of any appeal received, and make the appeal available to them, within **5 calendar days** after the 20-day appeal period ends.
- b) Submit proof of this notification to the Appeal Administrator within 5 calendar days after sending the last notification.

17.5. The applicant, where applicable, the decision-maker, or any person notified under regulation 4 of the National Appeal Regulations, 2025 may submit a Responding Statement within **20 calendar days** from the date they received the appeal, in the form obtainable from the Department website to the Appeal Administrator and to the appellant, where the appellant is not the applicant.

18. Appeals, Responding Statements and supporting documents must be submitted to the Appeal Administrator by means of one of the following methods:

a) By e-mail:

DEADP.Appeals@westerncape.gov.za or

b) By hand where that person submitting does not hold an electronic mail account:

Attention: Mr Marius Venter

Room 809, 8th Floor Utilitas Building,

1 Dorp Street, Cape Town, 8001

Note: You are also requested to submit an electronic copy (Microsoft Word format) of the appeal, responding statement and any supporting documents to the Appeal Administrator via email or to the address listed above.

A prescribed appeal application form as well as assistance regarding the appeal processes is obtainable from the office of the Minister at:

Tel. (021) 483 3721, E-mail DEADP.Appeals@westerncape.gov.za or URL <http://www.westerncape.gov.za/eadp>



MRS Z TOEFY

ACTING DIRECTOR: ENVIRONMENTAL GOVERNANCE

DATE: 24 April 2025

Copied to: (1) Michelle Naylor (EAP)

Email: michelle@lornay.co.za

ANNEXURE A: REASONS FOR THE DECISION

In determining the quantum of the administrative fine, the competent authority took, *inter alia*, the following into consideration:

- The section 24G application dated 15 November 2024 with supporting environmental impact assessment and mitigation measures.
- The consideration of Alternatives
- Public participation conducted for the application by the Environmental Assessment Practitioner.
- The Environmental Management Programme of June 2024 submitted for the application.
- Relevant information contained in the Departmental EIA Guideline and Information Document Series (March 2013), including, the Guidelines on Need and Desirability, Public Participation and Alternatives.
- The site inspection conducted on 26 March 2025, attended by officials of the Directorate: Environmental Governance.

All relevant information presented to the competent authority was taken into account in the determination of the fine quantum. A summary of the issues which, according to the competent authority, were the most significant reasons for the decision is set out below.

1. PUBLIC PARTICIPATION

A public participation process as outlined in section 24G(1)(vii)(dd) of the NEMA, "...a description of the public participation process followed during the course of compiling the report, including all comments received from interested and affected parties and an indication of how issues raised have been addressed..." was undertaken.

The public participation process conducted by the EAP comprised of the following:

- An advertisement was placed in **The Hermanus Times** newspaper;
- A site notice was erected; and
- Letters were sent to interested and affected parties ("I&APs") and the municipal ward councillor on 13 August 2024.
- I&APs were afforded the opportunity to provide comments on the application.

An I&AP, one of the neighbouring residents to Erf 5629, provided comment:

Five years ago when the large erf was subdivided and Erf 5629 was created, the surrounding residents were assured that two areas of fynbos containing a rare endangered *Serruria* would

be preserved as no development areas. However, the one area bordering on Disa circle was simply bulldozed flat and all plants removed. This is an environmental crime similar to that of removing milkwood trees. The Kogelberg Biosphere is a World heritage site and needs to be meticulously preserved for the present and future. The subdivision of the large original erf was against the better judgment of the original town planners who realized this was a watercourse off the mountain and significant conservation area. The subdivision was purely for altruistic reasons. There is no shortage of vacant residential erven in Bettys Bay. Photographic evidence exists of the original erf as it was prior to the subdivision.

There is now one area left that is marked as 'protected' and "no development". With the rare fynbos on, what protection will be provided for this portion? Or will shoulders be shrugged when this is also bulldozed in "error". All these decisions cannot be made from behind a desk. A proper in situ environmental assessment needs to be done prior to any permissions. The erf is large, about 4x bigger than the other residential erven in the area so there is ample space to erect a single residential house. Has an assessment been done of the damaged bulldozed area? Perhaps with the recent rains regeneration of the endangered *Serruria* would be possible and needs to be checked by a botanist."

The EAP indicated that, according to the freshwater specialist, there are no watercourses or wetlands on site. The clearance of vegetation was reported to the then Overstrand Environmental Management Section (EMS) in December 2021 and several site visits and communications were conducted with Mr. Smith to determine the way forward. Mr. Smith stated that – upon the purchase of the property - he was not made aware of the "No-Go Area" as a condition of approval of the subdivision of original Erf 4576 in 2020

1.1 Consultation with organs of state in terms of section 24O of the NEMA

The following organs of state provided comment on the application:

- CapeNature
- Breede-Olifants Catchment Management Agency (BOCMA)
- Overstrand Municipality
- Overberg District Municipality

CapeNature indicated that the NEMA S24G Report used the previous botanical studies to inform the application although they were not compiled for the purposes of assessing the retrospective impact as a result of the activity contemplated in the S24G application. CapeNature notes that both Figure 1 and Figure 2 in the S24G Report appear to be incorrect as they are labelled as indicating the site boundaries, however they only encompass part of

the site. It is assumed that the proposed disturbance footprint will be in accordance with the proposed layout plan for the dwelling. However, there was also clearing in the north-western corner which took place which is not part of the footprint.

Although the 2023 botanical input was for a planning application, it provides recommendations for the current proposal and includes reference to the existing disturbance as referred to above. None of the botanical studies included impact assessments as this is not required for planning applications. The S24G Report has however included an impact assessment based on the botanical studies undertaken with a rating of medium before mitigation and low after mitigation. CapeNature recommended that the botanical specialist must provide confirmation of agreement with the ratings and recommendation provided in the S24G Report.

The site is mapped as a wetland in the National Wetland Map. The 2006 botanical study indicated that the site is well drained, and the vegetation communities did not include any wetland vegetation communities. On this basis, it is motivated that there are no wetlands on site. While the botanical study provides evidence of the lack of wetlands, the presence of wetlands needs to be determined in accordance with the standard methodology including both soil and vegetation indicators. Comment should be provided by the Breede Olifants Catchment Management Agency (BOCMA) in this regard. CapeNature therefore recommends that a wetland delineation study must be undertaken to verify the presence or lack of wetlands. If wetlands are present, an assessment must be undertaken.

In conclusion, CapeNature recommends that a screening tool report and a site sensitivity verification report must be compiled as part of the application. The botanical studies must be accompanied by an addendum by the specialist which verifies the impact ratings and the recommendations. A wetland delineation study must be undertaken to verify the presence or absence of wetland and comment must be obtained from BOCMA.

The EAP responded that a Freshwater Screening Report has been conducted. The findings indicated that there are no watercourses or wetland present on site, therefore there are no freshwater habitat impacted as a result of unauthorised clearance.

The BOCMA indicated that, even though no construction had begun on this property, this communication in any case, is shared with the Compliance section of the BOCMA, who could assist with the investigation into the matter. BOCMA indicated that the comment provided is in the interest of responsible water resource management.

The EAP reaffirmed that the Freshwater Assessment confirmed that there are no wetlands or watercourse on site and that no further application is required in terms of the *National Water Act, 1998* (Act 36 of 1998).

The Overberg District Municipality's (ODM) department of Environmental Management Services (EMS) took cognisance of the S24G application for the unlawful clearance of vegetation to build a single residential development. It is acknowledged that the proposed development is situated within the urban edge of the Betty's Bay area and that the applicant has a development right.

The Western Cape Biodiversity Spatial Plan, 2017 (WCBSP) categorise the site as Ecological Support Area 2. The Overberg District Municipality's Spatial Development Framework clearly define Spatial Planning Categories (SPCs) to reflect how the area should be developed spatially to ensure sustainability. These SPCs are linked with the Biodiversity Spatial Plan Categories as defined in the WCBSP. ESA2 are classified as Buffer and should be restored or manage to minimise impact on Ecological infrastructure functioning, especially, soil and water related services.

The current applicant falls within Hangklip Sandstone Fynbos which is listed as critically endangered in the revised national list of ecosystems that are threatened and in need of protection, published 18 November 2022. The ODM's SDF promote the conservation of critically endangered ecosystem types and therefore support the proposal to limit the development footprint to the area which have already been impacted.

The ODM therefore has no objection against the proposed development and support the mitigation proposal as stipulated in the Botanical Assessment.

The previous EMS, now the Environmental Management & Conservation (EMC) Division of the Overstrand has taken into account the feedback received from the Botanical Specialist, Nick Helme who conducted the original botanical survey in 2006. As per the recommendations of Mr. Helme in correspondence dated 6 September 2023 addressed to Greeff Architecture, that included a site plan for a New Dwelling within the no-go area, the following as per this correspondence must be implemented to reduce further negative impacts to the remaining vegetation on site:

1. There should be no further clearance of vegetation by mechanical means (i.e. no earth-moving machinery that will remove the topsoil and associated seedbank).
2. The area earmarked for the development of the New Dwelling must be clearly demarcated to prevent further damage to the undisturbed vegetation.

As the property is categorised within the Overstrand EMOZ Regulations: Urban Conservation area (Category D: Private Property), the following must be implemented/adhered to:

3. Only locally endemic plant species may be planted on the property should the owner wish to plant in the areas in the area for earmarked for the development. Areas outside of the development area must remain as natural vegetation. Should fire management be required,

thinning/reduction of fuel load should occur by non-mechanical means, i.e. thinning, reducing fuel load by means of hand-tools only.

4. Alien Invasive Plant Species (AIPS) must be removed by non-mechanical methods on a regular basis. Should the control of AIPS entail the application of herbicides, this must be conducted as required.

2. CALCULATION OF THE ADMINISTRATIVE FINE

Section 44(1)(aC) of the NEMA makes provision for the *“Minister to make regulations relating to the procedure and criteria to be followed in the determination of an administrative fine in terms of section 24G.”*

The Section 24G Fine Regulations, 2017 (“the regulations”) as referred to above have come into effect on 20 July 2017 which stipulate the procedure to be followed and criteria for the determination of a section 24G administrative fine. All applications submitted after the promulgation date are subject to the aforesaid regulations which stipulate the maximum fine applicable to an application is R5 million, as per the NEMA amendments.

The S24G fine calculator is a guide that is not rigidly applied and is used to determine an appropriate fine (to the maximum of R5 million) based on applicable impacts resulting from the unlawful commencement activity/ies on the receiving environment. The determination of a fine is based on the assessment undertaken for the section 24G application and the significance of impacts of the activity/ies on the environment. Each section 24G administrative fine is determined on its own merit and is dependent on the information provided in the application. The section 24G fine is not a criminal sanction and the section 24G process is distinct and not punitive in nature.

In accordance with section 24(4) of the *National Environmental Management Act, 1998* (Act No. 107 of 1998) (“NEMA”) the application contains, *inter alia*, an assessment of the consequences and impacts on the environment, including cumulative impacts, and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the activity as well as a description of the mitigation measures that will be undertaken.

2.1 ASSESSMENT OF IMPACTS, BENEFITS AND MITIGATION MEASURES

The determination of the administrative fine is based on the administrative fine calculator which was developed by the National Department of Environmental Affairs. The fine calculator (which is a guide that is not applied rigidly) was based on the following indexes that were informed by the environmental assessment practitioner as specified in the section 24G application:

- Socio-Economic Impact Index
- Biodiversity Impact Index
- Sense of Place &/ or Heritage Impact Index
- Pollution Impact Index.

The administrative fine decision and the reasons for the decision were informed by the section 24G application with supporting information, submitted by the environmental assessment practitioner, which stated *inter alia* the following:

2.1.1 Socio-economic Impact

The **Socio-Economic Impact Index** was rated by the EAP that *"The activity is not giving, has not given and will not give rise to any negative socio-economic impacts"*.

No motivation for this rating was provided by the EAP.

Having regard to the impacts caused by the activities, I am in agreement with the fine committee's recommendation that the administrative fine calculator be scored consistent with the score of the application that: *"The activity is not giving, has not given and will not give rise to any negative socio-economic impacts"*.

The motivation for this rating is that the clearance of vegetation on site does not result in a socio-economic impact beyond the construction phase.

2.1.2 Biodiversity Impacts

The **Biodiversity Impact Index** was rated by the EAP that *"The activity is giving, has given or could give rise to localised biodiversity impacts"*.

The motivation for this rating by the EAP was that *"The disturbance and removal of critically endangered vegetation took place on the property. It is important to note that the applicant was unaware of the no-go area on the property, however, about only 25% of the property has been cleared (~300 – 450 m²). According to the Botanical specialist*

findings, the primary construction phase botanical impact of development would be permanent loss of all or most of the existing natural and partly natural vegetation in the development footprint (about 300m², gazetted as a Critically Endangered vegetation type). The remaining portion of the site population of the single plant Species of Conservation Concern (Serruria adscendens; NT) will not be further impacted by the proposed development, but about 60% of the original site population of this species was lost to the unauthorised clearing."

Having regard to the impacts caused by the activities, I am in agreement with the fine committee's recommendation that the administrative fine calculator be scored consistent with the score of the section 24G application that: *"The activity is giving, has given or could give rise to localised biodiversity impacts"*

The motivation for this rating is that the applicant cleared critically endangered vegetation on site where he intended to build his residential dwelling on the property. According to the Botanical specialist findings, the primary construction phase botanical impact of development would be permanent loss of all or most of the existing natural and partly natural vegetation in the development footprint.

2.1.3 Sense of place and Heritage Impacts

The **Sense of place and Heritage Impacts Index** was rated by the EAP that *"The activity is in keeping with the surrounding environment and / or does not negatively impact on the affected area's sense of place and /or heritage."*

The motivation for this rating by the EAP was that *"The activity is in line with surrounding residential land use and will not impact the surrounding environment's sense of place."*

Having regard to the impacts caused by the activities, I am in agreement with the fine committee's recommendation that the administrative fine calculator be scored consistent with the score of the section 24G application that: *"The activity is in line with surrounding residential land use and will not impact the surrounding environment's sense of place."*

The motivation for this rating is that the activity is in keeping with the surrounding residential land uses and is not seen as out of place or character.

2.1.4 Pollution Impact

The **Pollution Impact Index** was rated by the EAP that *"The activity is not giving, has not given and will not give rise to any pollution"*.

The motivation for this rating by the EAP was that "The clearance of vegetation has already occurred in the property and will not cause any pollution on the environment."

Having regard to the impacts caused by the activities, I am in agreement with the fine committee's recommendation that the administrative fine calculator be scored consistent with the score of the section 24G application that: *"The activity is not giving, has not given and will not give rise to any pollution"*.

The motivation for this rating is that the activity does not result in the production of waste or any pollution.

The indices contained in the section 24G application submitted by the EAP were used in the determination of the fine. This was assessed, reviewed and confirmed by observations obtained during the site inspection on 26 March 2025.

It should also be noted that the section 24G fine calculator distinguishes between the following two categories of offenders:

- Category 1 offenders are (firm) trusts, body corporates, close corporations, companies, parastatals and government departments.
- Category 2 offenders are individual/natural persons.

The calculation of the administrative fine is also based on the fact that the applicant in this matter is a category 2 offender. Nevertheless, the amounts determined by the section 24G fine calculator for both categories were analysed to assess whether it is appropriate to regard the applicant under the abovementioned category, given the personal circumstances of the applicant. I am of the opinion that it is appropriate to regard the applicant in this matter is a category 2 offender.

2.2 OTHER CONSIDERATIONS AND REPRESENTATIONS

Further to the above, the following factors were taken into account in determining whether the fine recommended by the fine calculator is appropriate in the circumstances of this matter and whether there are reasons to deviate from the quantum of the fine recommended:

2.2.1 Aggravating factors, or the absence thereof, such a blameworthiness, non-compliance history and ignoring previous advice.

In this regard, the fact that the applicant and/or its director have not previously been advised that conduct such as occurred in the present matter constituted an offence and required prior environmental authorisation is noted.

2.2.2 Mitigation factors such as preventative measures, co-operation with the environmental authority, immediate voluntary remediation and restoration and personal circumstances.

In this regard, I have considered the applicants conduct and am of the view that no mitigating factors exist which justify a deviation from the recommended fine amount.

2.2.3 The potential costs that the applicant will incur in complying with directions as to remedial measures.

In this regard, the contents of the Application, together with the assessment report and suggested mitigation/rehabilitation measures are noted.

2.2.4 Social/Public benefit factors resulting from activities.

In this regard, I am of the opinion that the applicant's activities provide no direct social service to the affected community and will have little, or no, positive impact on job creation or poverty alleviation in the area which justifies a deviation from the recommended fine amount].

It is acknowledged that the National Environmental Management Principles (set out in section 2 of the NEMA) which apply to the actions of all organs of state, serve as guidelines by reference to which any organ of state must exercise any function when taking any decision, and which must guide the interpretation, administration and implementation of any other law concerned with the protection or management of the environment. In terms of the NEMA Principles, the effects of decisions on all aspects of the environment are to be taken into account. I am satisfied that the NEMA principles, including the consideration, assessment and evaluation of the social, economic and ecological impacts of activities (disadvantages and benefits), have been correctly applied in this application and this fine is appropriate in the light of such consideration and assessment.

In all the circumstances, and after weighing all the above, I am of the view that a fine of **R25 000 (Twenty-five thousand rand)** is an appropriate fine. Please find attached a copy of the calculated fine (Appendix 1)

Appendix 1

14/2/4/2/2/E2/1/0019/24

2016 SECTION 24G CALCULATOR				
IMPACT INDEX CALCULATOR				
1 Socio Economic Impact Index		Weighting	20	
Description of variable			Selection	Score
a	The activity will not give rise to any negative socio-economic impacts	0.5	X	10
b	The activity could give rise to negative socio-economic impacts, but highly localised	3		0
c	The activity could give rise to significant negative socio-economic and regionalized impacts	7		0
d	The activity could result in wide-scale socio-economic impacts.	10		0
Notes: The clearance of vegetation on site does not result in a Socio-economic impact beyond the construction phase.				
2 Biodiversity Impact Index		Weighting	30	
Description of variable			Selection	Score
a	The activity will not give rise to any impacts on biodiversity	0.5		0
b	The activity could give rise to localised biodiversity impacts	3	X	90
c	The activity could give rise to significant biodiversity impacts	8		0
d	The activity is likely to permanently / irreversibly transform/ destroy a recognised biodiversity 'hot-spot' or threaten the existence of a species or sub-species.	10		0
Notes: The disturbance and removal of critically endangered vegetation took place on the property. It is important to note that the applicant was unaware of the no-go area on the property, however, about only 25% of the property has been cleared (~300 – 450 m2). According to the Botanical specialist findings, the primary construction phase botanical impact of development would be permanent loss of all or most of the existing natural and partly natural vegetation in the development footprint (about 300m2, gazetted as a Critically Endangered vegetation type). The remaining portion of the site population of the single plant Species of Conservation Concern (<i>Serruria adscendens</i> ; NT) will not be further impacted by the proposed development, but about 60% of the original site population of this species was lost to the unauthorised clearing.				
3 Sense of Place & / or Heritage Impact Index		Weighting	20	
Description of variable			Selection	Score
a	The activity is in keeping with the surrounding environment and / or does not negatively impact on the affected area's sense of place and /or heritage	0.5	X	10
b	The activity is not in keeping with the surrounding environment and will have a localised impact on the affected area's sense of place and/or heritage	3		0
c	The activity is not in keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage	8		0
d	The activity is completely out of keeping with the surrounding environment and will have a significant impact on the affected area's sense of place and/ or heritage	10		0
Notes: "The activity is in line with surrounding residential land use and will not impact the surrounding environment's sense of place."				
4 Pollution Impact Index		Weighting	30	
Description of variable			Selection	Score
a	The activity will not give rise to any pollution	0.5	X	15
b	The activity could give rise to pollution with low impacts.	3		0
c	The activity could give rise to pollution with moderate impacts.	5		0
d	The activity could give rise to pollution with high impacts.	8		0
e	The activity could give rise to pollution with major impacts.	10		0
Notes: "The clearance of vegetation has already occurred in the property and will not cause any pollution on the environment."				
			TOTAL SCORE	125
			IMPACT INDEX	12.50%
Applicant				
Individual			25,000.00	
Committee Reasons for Deviation (only when relevant)				
Deviation criteria was considered but not applied for this matter. A Fine of R25 000 was deemed appropriate				
Fine Amount			25,000.00	