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ENVIRONMENTAL CONSULTING

SITE SENSITIVITY VERIFICATION REPORT (SSVR) FOR S24G

Portion 1 of the Farm Wortelgat No. 723, Stanford

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INTRODUCTION

This Site Sensitivity Verification Report (SSVR) has been prepared in accordance with the requirements of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the procedures outlined in the Environmental Impact Assessment (EIA) Regulations. The report supports a Section 24G application for the unlawful commencement of listed activities related to the use of five (5) stilted boathouse units and associated infrastructure, for tourism expansion on Portion 1 of Farm Wortelgat No. 723, located near the Klein River Estuary within the Overstrand Local Municipality, Western Cape.

The development forms part of the broader tourism node, where the boathouse units are operating as part of an eco-tourism offering which are in line with the farm existing operations. The structures were constructed between 2021 and 2024, with the first four units, associated access road, and lawn area completed during 2021–2022, and the fifth unit was constructed and completed in 2024. The development footprint is located more than 32m of the temporal wetland edge and designed to minimise environmental impact through elevated construction and low-density layout.

In line with Regulation 16(1)(v) of the EIA Regulations, the National Web-Based Screening Tool was used to identify the environmental sensitivities applicable to the development footprint. This Site Sensitivity Verification Report serves to verify the actual sensitivity of the site through on-site verification and review of specialist studies.

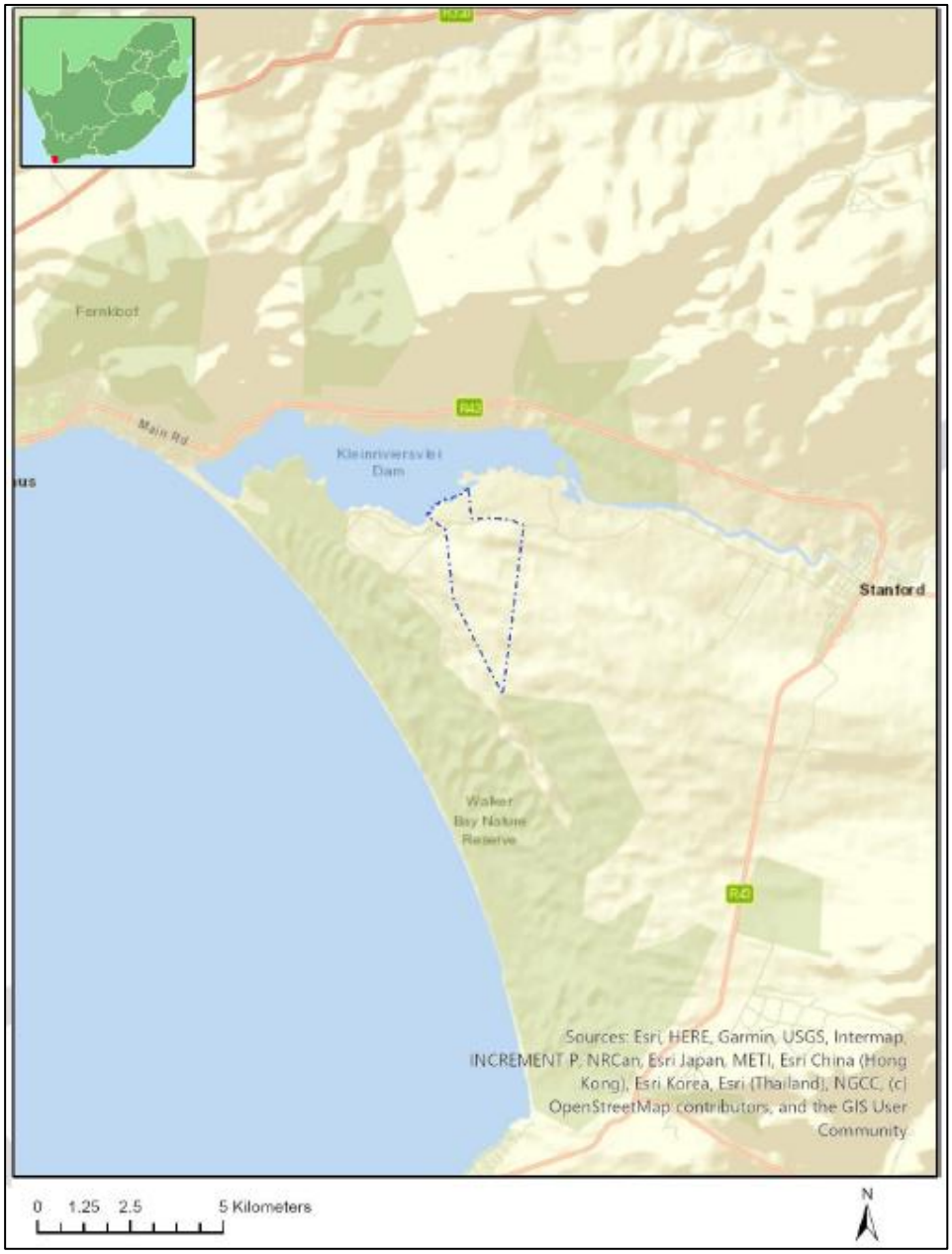

Figure 1. Locality of subject property

The preliminary layout alternative is as follows and was assessed by all specialists.

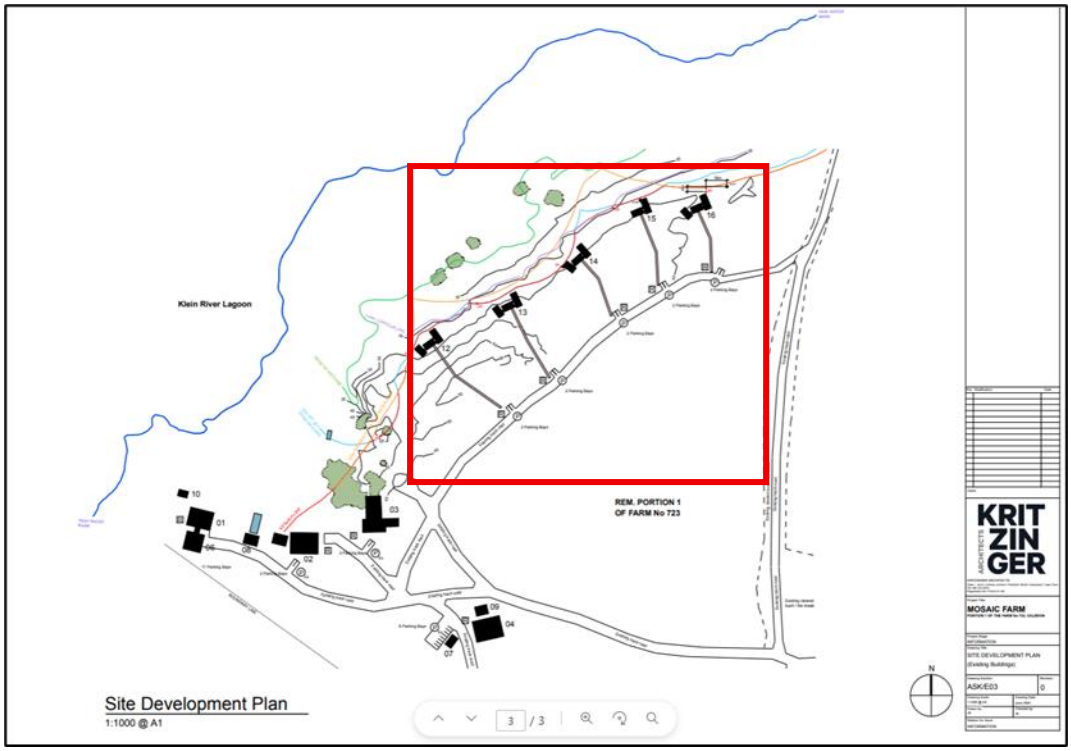

Figure 2. Image showing the development area and associated infrastructure (five stilted boathouse units, access road, and lawn area) outlined in the red box on Portion 1 of Farm Wortelgat No. 723. This delineates the footprint relevant to the Section 24G application and subject to sensitivity verification.

PURPOSE OF THE REPORT

Lornay Environmental Consulting (Pty) Ltd, was appointed to undertake the required Environmental Authorisation (EA) application process in terms of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) promulgated under the National Environmental Management Act, 1998 (No. 107 of 1998; NEMA), for the proposed project.

Based on the classification selected and the known impacts with the proposed development, the Screening Tool lists the following specialist assessments to be included in the BAR process and / or motivation as to why these specialists are not applicable to the site

- → Landscape / Visual Impact Assessment
- → Archaeological and Cultural Heritage Impact Assessment
- → Palaeontology impact assessment
- → Terrestrial Impact Assessment
- → Aquatic Biodiversity Impact Assessment
- → Socio-Economic Impact Assessment
- → Plant Species Assessment
- → Animal species assessment

Table 1: Environmental Sensitivities on the property

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			

Agricultural Theme (*High Sensitivity)*

The National Web-Based Environmental Screening Tool identifies the site as having a High Agricultural Sensitivity, primarily due to its location outside of the urban edge and its designation within an agricultural land use zone. However, the subject property (Portion 1 of Farm Wortelgat No. 723) has already been partially transformed and developed for tourism purposes. The five (5) stilted boathouse units in question were constructed within a designated tourism node of Coot Club, and the immediate surrounding area includes properties zoned as Resort Zone and Agricultural Zone.

Given that the site is not actively used for commercial agriculture and does not form part of a productive agricultural unit, the tourism land use does not pose a conflict with current or potential agricultural operations. Furthermore, the infrastructure is of a low-impact nature, elevated on stilts to minimise surface disturbance, and no permanent loss of arable land or soil capability has occurred as a result of the development.

In light of the existing land use context and the absence of agricultural activities on-site, it is therefore submitted that the requirement for an Agricultural Impact Assessment may be disputed. The sensitivity rating assigned by the Screening Tool is not reflective of the on-the-ground conditions. As such, the impact on the agricultural theme is considered to be low to negligible, and no further agricultural assessment is deemed necessary.

Animal Species Theme *(High Sensitivity)*

The National Web-Based Screening Tool identified the site as having High Sensitivity under the Animal Species Theme, triggered by the potential presence of various species of conservation concern. These include:

African marsh harrier (Circus ranivorus)

The African Marsh Harrier is listed as a species of High Sensitivity on the National Environmental Screening Tool. The species is classified as Endangered in South Africa (Taylor 2015b), with habitat loss and degradation being the most significant threat to the continued survival of this species.

According to SANBI, (2015) this medium-sized species depend on permanent wetlands, both inland and coastal, occurs in marshes, reedbeds, vlei margins, floodplains, and occasionally along seasonally inundated grasslands. It also hunts over drier floodplains, grasslands, croplands, and Fynbos, where it preys mainly on small rodents (Simmons 2005), as well as birds, reptiles, frogs and insects (SANBI, 2015). It prefers wetland complexes with tall emergent vegetation, which provide cover for nesting and hunting. Their nests are usually placed in reedbeds

over water, although breeding has been recorded in adjacent sedges, Fynbos, scrub and agricultural fields, but these are considered to be rare occurrences (SANBI, 2015).

A site visit and landscape plan assessment of the subject development footprint, including the area of five boathouses, lawn areas and access road, have already been undertaken by the appointed specialist. The findings indicate that the area shown signs of previous disturbance, most likely linked to historical agricultural clearing and invasive alien species infestation (Privett, 2020). As such, the existing condition of the site has reduced the likelihood of it currently serving as a suitable breeding or foraging habitat for the African Marsh Harrier. However, given the species' conservation status and sensitivity, it remains critical that any further encroachment into natural or semi-natural wetland habitat is avoided or carefully managed.

Caspian Tern (Hydroprogne caspia)

Within the region, it is concentrated at estuaries and sheltered bays along the coastline and at large, permanent inland waterbodies (Brooke 1984). Twenty-eight historical breeding localities are known although the species currently breeds at only ten sites, two of which are Important Bird Areas, namely iSimangaliso Wetland Park (IBA SA058) and West Coast National Park and Saldanha Bay Islands (IBA SA105). The movement of a ringed bird from Algoa Bay, Eastern Cape to Lake St Lucia suggests that the southern African breeding populations may not be isolated from each other (Martin 1991). It is note expected that the size and nature of the boathouses would have a negative impact on this species habitat or range.

The Black Harrier (Circus maurus)

According to SANBI (2018) The Black Harrier is restricted to southern Africa, where it is mainly found in the fynbos and Karoo of the Western and Eastern Cape. Black Harrier Circus maurus is a rare endangered, southern African endemic that may have lost more than 50% of its breeding habitat as a result of extensive land transformation by agriculture, invasive alien vegetation and urbanization in the Fynbos biome (Curtis et al. 2004, Taylor 2015a). Black Harriers prefer coastal and mountain fynbos, highland grasslands, Karoo sub-desert scrub, and open plains with low shrubs and croplands (SANBI, 2018). They breed close to coastal and upland marshes, damp sites, near vleis or streams with tall shrubs or reeds (SANBI, 2018). South-facing slopes are preferred in mountain areas where temperatures are cooler and vegetation is taller. During the non-breeding season they will also be found in dry grassland areas further north and they also visit coastal river floodplains in Namibia (SANBI, 2018).

The site under assessment supports re-established vegetation and lies adjacent to a floodplain, wetland, and lagoon system habitats that could potentially support this species type. However, based on the scale and location of the boathouses, access roads, and associated lawn areas it is unlikely that significant habitat loss for this species occurred as a direct result of the development. The development area is located more than 32m away from the wetland edge and more than 100m away from the High-Water Mark of the estuary. Therefore the impact of the existing development is considered to be very low.

Denham's bustard (Neotis denhami)

Denham's bustard occurs in natural vegetation (fynbos and grasslands), pastures and agricultural fields (Allan 2005). The species is classified as 'Vulnerable'(Taylor 2015c), mainly due to powerline collisions (Shaw et al. 2010), habitat conversion to intensive monoculture fields, and overgrazing of grassland habitats. Its habitat use is known to vary seasonally, reflecting its adaptability to different environmental conditions (Allan, 2002). The species exhibits flexible foraging habits and distinctive breeding behaviour, often influenced by habitat structure and human land-use patterns. In Western Cape, Denham's Bustard can be locally numerous in mosaics of

cultivated pastures, agricultural croplands and natural vegetation with clear seasonal differences in the use of each habitat type (Allan 2002). Its presence within a landscape typically depends on the availability of open areas for foraging and low human disturbance, particularly during the breeding season.

The construction of the five (5) stilted boathouses, access roads, and lawn area, which involved localized clearance of indigenous vegetation, occurred within a pre-defined development footprint. This activity did not result in the loss of any known breeding or foraging habitat for Denham's Bustard, and no individuals were observed during the site assessment phases or construction period. Given the localized nature of the development, the retention of natural vegetation across most of the site, and the species' known tendency to avoid areas with sustained human activity, it is unlikely that Denham's Bustard would have relied on the site as a core habitat area. Therefore, the impact of the boathouses on this species location and habitat is considered to be very low.

Afrotis afra (Southern Black Korhaan)

The Southern Black Korhaan occurs in the Fynbos Biome, mainly in Renosterveld and Strandveld, and in the Nama and Succulent Karoo biomes (Crowe et al. 1994). The species shows a distinct preference for natural habitats over transformed land, although it is seen in cultivated land where little natural habitat remains available to it (Hofmeyr 2012). However, it is absent from pristine natural vegetation that is too dense and high to permit easy terrestrial mobility and good visibility. The development area in question, Portion 1 of Farm Wortelgat No. 723, was described by specialist as showing signs of partial historical disturbance, including past agricultural activity and partial vegetation clearing. These conditions may have temporarily created open habitat structures more suitable to the species' ecological requirements.

However, the transformation of this partially disturbed environment into a developed site with infrastructure (i.e., boathouses, access roads, and lawns) may have reduced habitat suitability for the species. Given the limited extent of the development footprint and the presence of surrounding natural vegetation patches, the impact on the Southern Black Korhaan is considered limited and localised.

Southern Adder (Bitis armata)

It is stated that the species occurs mainly in coastal fynbos associated with limestone geology. Shelters under limestone rock slabs between dense shrubs on coastal plains (Branch 1998). According to Venter, 2024 Southern Adder *Bitis armata* is classified as 'Vulnerable' because of its severely fragmented distribution due to the reduction in the extent and quality of its habitat (Maritz and Turner 2023). This species has a small distribution in the southwest coastal margin of the Western Cape with three disjunct subpopulations, one from West Coast National park to just north of Cape Town, the second near Hermanus and the third near De Hoop Nature reserve (Maritz and Turner 2023). The species occurs mainly in coastal lowland Fynbos on sandy and rocky substrates (Phelps 2010). It is known to shelter under rock slabs between dense shrubs on coastal plains (Phelps 2010). According to Venter, (2024) iNaturalist and GBIF records for this species is concentrated between Stanford and Struisbaai.

The natural vegetation in the area, primarily Agulhas Limestone Fynbos, may provide suitable habitat for this species. However, the underlying substrate of the boathouses consists mainly of sand, and no rocky outcrops are present within the previously developed boathouse area. Consequently, the boathouses are considered to have had a very low impact on the species' habitat, based on their location.

Forest invertebrates (general classification)

On Portion 1 of Farm Wortelgat No. 723, the presence of mature milkwood stands and dune thicket vegetation in adjacent undisturbed areas may support a range of forest-dwelling invertebrates. Although the development footprint (including stilted boathouses, access paths, and lawns) has transformed localized areas, patches of intact natural vegetation remain, and may continue to serve as microhabitats for invertebrate assemblages, particularly those adapted to shaded, leaf-litter-rich environments.

While no formal invertebrate survey has been undertaken on-site, the ecological potential for forest invertebrate species to occur within the broader property context remains. However, no further vegetation clearance must be undertaken in the property without environmental authorisation. Management measures such as alien vegetation control, limited soil disturbance, and organic ground cover retention should be maintained to support invertebrate diversity.

Given the generalist nature of this classification and the site's partial transformation, the impact on forest invertebrates is assessed as low, provided that remaining thicket and milkwood patches are preserved and no further habitat degradation occurs.

Mute Winter Katydid (Brinckiella aptera)

According to SANBI, (2014) the Mute Winter Katydid (*Brinckiella aptera*) is Vulnerable under criterion B1 because its extent of occurrence is relatively small (~12,500 km^2), it has only been recorded in four locations, and its habitat quality is estimated to be in decline. This species occurs within the Fynbos and Succulent Karoo biomes, both of which are notable biodiversity hotspots, naturally geographically restricted and under anthropogenic stress (SANBI, 2014). It has been found at four locations only, including Bredasdorp, Pearly Beach and Tulbagh (Venter, 2024). Its host plant data is absent but predictably feeds on flowers and leaves of a narrow range of host plants (re: are thus quite host specific), occurring on low-growing, herbaceous shrubs (Naskrecki and Bazelet 2009). While this species has been reported as associated with *Begonia aptera* vegetation (Venter, 2024), this plant species was not identified in the landscape plan survey of the study area. The development of boathouses is considered to have very low impact on the habitat and species occurrence in the area.

Yellow-winged Agile Grasshopper (Aneuryphymus montanus)

The Yellow-winged Agile Grasshopper is an endemic grasshopper species occurring on Western and Eastern Cape mountains (venter, 2024). Venter, (2024) indicated that the species is listed as vulnerable on the IUCN Red List Category. These species are generally associated with wetland margins, fynbos habitats, and open landscapes that are relatively undisturbed. Sites where the species have been documented include Graafwater, close to Lambert's Bay, De Rust, Suurbraak, Bot River, Kogelberg and Joubertinia. The species seems to show preference for rocky, mountainous areas (Venter, 2024). However, site verification and findings from both the 2019 Applicability Checklist and the 2018 freshwater specialist assessment confirm that the five (5) were constructed on stilted, minimising ground disturbance. Furthermore, no observations or physical evidence of these species were recorded during site investigations or construction activities.

The stilted design of the units minimises soil disturbance and allows for continued small fauna movement underneath. Additionally, natural vegetation corridors remain intact between the units and along the estuarine edge, ensuring broader habitat connectivity remains functional. Given these factors, and the small development footprint (<300 m^2 for the final unit), the residual risk to this species is considered very low, and a full Animal Species Specialist Assessment is not deemed necessary.

Aquatic Biodiversity Theme *(Very High Sensitivity)*

The Screening Tool classifies the site as having Very High Sensitivity under the Aquatic Biodiversity Theme, primarily due to its proximity to the Klein River Estuary and associated wetland habitats. This rating is supported by the findings of a detailed freshwater specialist study (Day, 2018), which identified a complex mosaic of brackish and freshwater wetland systems, including estuarine marshes, seasonally inundated saltmarshes, and groundwater-fed seep zones. These wetlands support a diverse range of habitat types and species assemblages, contributing to the ecological richness and conservation value of the broader estuarine ecosystem.

Although the area is sensitive, it is important to note that the five (5) tourism accommodation units are located outside the delineated wetland boundary, on a previously transformed dune area. The site maintains a minimum 32 m setback from the temporary wetland edge, and the development footprint was carefully positioned to avoid encroachment into aquatic or riparian habitat. During the time of the delineation study, freshwater influence was dominant in the open water pools, and no direct disturbance of wetland habitat was associated with the siting of the units.

The freshwater specialist confirmed that, while hydrological connectivity exists between the upper slopes and the lagoon system via shallow sub-surface flows, the operational phase of the development poses minimal ecological risk provided that mitigation measures are implemented. These include the use of conservancy tanks (appropriately bunded), avoidance of fertilisers or saltwater discharges, and the use of porous paving and soakaways to limit concentrated runoff.

In light of the above, while the Screening Tool correctly identifies the aquatic ecosystem as highly sensitive, the actual risk to aquatic biodiversity from the existing development is considered low, given the precautionary siting of infrastructure, the absence of direct habitat loss, and the capacity to manage edge effects through well-established mitigation practices. Consequently, no further aquatic biodiversity assessment is considered necessary, provided that compliance with the recommended mitigation and monitoring measures is maintained.

Archaeological and Cultural Heritage Theme *(Very High Sensitivity)*

According to the National Web-Based Environmental Screening Tool, the site is classified as having Very High Sensitivity under the Archaeological and Cultural Heritage Theme. This reflects its location within a scenic and culturally significant landscape along the Klein River Estuary. The Overstrand Public Viewer further identifies a Route of Regional Scenic Significance (the R43) located approximately 1.9 km south of the development site, indicating the visual and cultural value of the broader setting.

Portion 1 of Farm Wortelgat No. 723, however, forms part of an already established eco-tourism node known as Mosaic Private Sanctuary. The five (5) boathouse units were developed within a carefully selected area set back from the estuary and scenic route. The design approach of the boathouses, lawn area and the access raods was low impact, integrating timber modular structures raised on piles, minimising disturbance to dune vegetation and respecting the surrounding cultural landscape. Natural screening is provided by indigenous vegetation, including mature milkwood groves, which visually shield the development from most surrounding viewpoints.

The Visual Impact Assessment (VIA) conducted by Bernard Oberholzer (2019) determined that the proposed development would have a localised visual influence, with low visibility from public viewpoints, including the R43 Route and properties across the lagoon. Receptors such as boat users may experience moderate visibility, but the visual impact was rated as low to medium before mitigation and low after mitigation, due to factors such as distance, vegetation screening, small-scale building forms, muted colours, and non-reflective materials.

Furthermore, the development respects the cultural and scenic qualities of the area, contributing to the sense of place rather than detracting from it.

Civil Aviation Theme *(Low Sensitivity)*

The Screening Tool classifies the site as having Low Sensitivity under the Civil Aviation Theme. This is consistent with the site's location, which is not in close proximity to any major civil or military airports, airstrips, or designated aviation zones. The five (5) tourism accommodation units developed on Portion 1 of Farm Wortelgat No. 723 are of low height and do not exceed standard building height restrictions. Given the absence of aviation-related infrastructure in the vicinity and the nature of the existing development, no civil aviation constraints are applicable, and no further assessment is required under this theme.

Defence Theme *(Low Sensitivity)*

The Screening Tool identifies the site as having Low Sensitivity under the Defence Theme. Given the nature and location of the development comprising low-impact, tourism-related accommodation units within a privately owned property no implications for national defence infrastructure or operations have been identified, and no further assessment is required under this theme.

Palaeontology Theme *(Very High Sensitivity)*

The Screening Tool classifies the site as having Very High Sensitivity under the Palaeontology Theme, likely due to its location within the Agulhas coastal plain, which is known to contain fossil-rich geological formations, including marine and aeolian sediments with potential palaeontological significance. These areas may yield fossil assemblages such as molluscs, invertebrates, or even trace fossils embedded within calcrete horizons or dune sands. The units are elevated on stilts, significantly reducing the need for deep excavation or subsurface disturbance. At the time of construction, no fossil material was uncovered, and no palaeontological monitoring or heritage incidents were reported.

Given the limited extent of ground disturbance, the absence of any fossil finds, and the low likelihood of impact on subsurface heritage resources, a Palaeontological Impact Assessment (PIA) was not deemed necessary. Heritage Western Cape (HWC) subsequently approved the development on the basis that the mitigation measures set out in the Visual Impact Assessment (VIA) were implemented, and that the information contained in the VIA met the requirements of Section 38(3) of the National Heritage Resources Act (Act No. 25 of 1999).

Plant Species Theme *(High Sensitivity)*

The National Web-Based Environmental Screening Tool identifies the site as having High Sensitivity under the Plant Species Theme. This classification is primarily due to the presence of Agulhas Limestone Fynbos, an ecosystem type initially mapped on the property. At the time of site clearance and construction planning (2019–2021), this vegetation type was listed as Vulnerable and noted in the Applicability Checklist prepared prior to development.

A Landscape Plan conducted by Privett (2020) refined the vegetation classification following site verification. The assessment revealed that the actual vegetation present on-site was more characteristic of Overberg Dune Strandveld (currently referred to as Southwestern Strandveld), which was found in a state of partial recovery. Despite this revision, it remains ecologically significant, supporting a diverse flora assemblage and providing habitat for a variety of faunal species. The four (4) stilted boathouse units, access road, and lawn area were constructed between 2022 and 2023, within a designated development footprint, avoiding additional areas of natural vegetation. During this period, Agulhas Limestone Fynbos was reclassified from Vulnerable to Critically

Endangered (2022), highlighting an increased level of threat to this vegetation type and emphasising the importance of any remaining patches for conservation.

A fifth boathouse unit was constructed in 2024, also within the previously disturbed zone of the property. The development footprint of this unit was restricted to less than 300 m², and care was taken to site the structure in a manner that minimised additional disturbance. Low-impact landscaping and construction techniques were implemented to avoid further degradation of indigenous vegetation as well as to protect the boathouses from an event of fire. Given the underlying vegetation as described Agulhas Limestone Fynbos, ongoing management is essential. This includes maintaining minimal disturbance within the footprint, preventing the spread of invasive alien species, and ensuring that any landscaping or rehabilitation utilises only locally indigenous species. With these measures in place, the residual impact on plant species is considered low, supporting the ecological integrity of the remaining vegetation on site.

Terrestrial Biodiversity Theme *(Very High Sensitivity)*

The Screening Tool flags the site as having Very High Sensitivity under the Terrestrial Biodiversity Theme, owing principally to its location within the Agulhas Limestone Fynbos biome (now reclassified as Critically Endangered) and its inclusion within mapped Critical Biodiversity Areas (CBAs) that facilitate faunal movement along the Klein River corridor. However, these designations reflect both the presence of globally significant vegetation types and the ecological connectivity required for species dispersal across the coastal plain. It is important to note that no ecological corridors are mapped directly within the developed area itself.

Given the minimal scale of ground disturbance, the retention of natural corridors between units, and the absence of new vegetation clearance beyond the originally disturbed dune area, the residual impact on terrestrial biodiversity is considered low to negligible. While the broader area's sensitivity warrants careful ongoing management, a full specialist Terrestrial Biodiversity Assessment is not considered necessary, provided that standard environmental management measures are implemented.

Key recommended measures include ongoing alien invasive species control, maintenance of openness beneath the elevated structures to facilitate fauna movement, and clear guest education through signage and information materials. These communications should stress the importance of remaining on designated paths and respecting no-go areas established to protect sensitive vegetation and wildlife habitats, thereby minimizing human disturbance and preserving the ecological integrity of the site.

Specialist Assessments Identified by Screening Tool

Landscape/Visual Impact Assessment

The low-impact nature of the existing stilted boathouse units and their integration within the vegetated environment further reduce potential visual impacts. Consequently, no further specialist assessment related to landscape or visual impacts is required.

Archaeological and Cultural Heritage Impact Assessment

The Screening Tool identifies the site as having very high sensitivity for archaeological and cultural heritage. However, given the limited scale of disturbance within and the absence of any recorded heritage features or archaeological finds during construction or specialist site visits, a full Archaeological and Cultural Heritage Impact Assessment was not considered necessary. However, HWC letter dated 27 November 2019 approved and supported the VIA that was compiled. Furthermore, the recommendations were that if any unexpected

archaeological or palaeontological material evidence of burials is discovered during earth-moving activities all works must be stopped immediately and Heritage Western cape must be notified immediately.

Palaeontological Impact Assessment

Given the limited excavation involved and the elevated nature of the structures, a full Palaeontological Impact Assessment is not considered necessary. Furthermore, the recommendations were that if any unexpected archaeological or palaeontological material evidence of burials is discovered during earth-moving activities all works must be stopped immediately and Heritage Western cape must be notified immediately.

Terrestrial Biodiversity Impact Assessment

Given the limited scale of disturbance, the elevated design of the boathouse units, and ongoing management practices such as alien invasive species control, a full Terrestrial Biodiversity Impact Assessment is not considered necessary.

Aquatic Biodiversity Impact Assessment

The Screening Tool identifies the site as having very high sensitivity for aquatic biodiversity due to its proximity to the Klein River Estuary and associated wetland systems. A freshwater specialist delineation study conducted in 2018 confirmed that the wetlands adjacent to the development area comprise a complex mosaic of estuarine marshes, saltmarshes, and seepage zones with high ecological value. However, the five (5) stilted boathouse units are located outside the delineated wetland boundary, maintaining a minimum 32-meter setback from sensitive aquatic habitats. Given the low-density, minimal-impact nature of the development and the implementation of appropriate mitigation measures such as the use of conservancy tanks, minimization of hard surfaces, and control of runoff further detailed aquatic biodiversity impact assessment is not required.

Socio-Economic Impact Assessment

The Screening Tool identifies the potential for socio-economic impacts related to the utilisation of the five (5) stilted boathouse units for tourism accommodation on Portion 1 of Farm Wortelgat No. 723. The development contributes to the local economy by supporting eco-tourism, generating short-term employment opportunities during construction phases, and providing ongoing part-time and seasonal jobs linked to tourism operations. Additionally, the development aligns with regional tourism strategies aimed at sustainable economic growth within the Overstrand Municipality.

Given the limited scale and nature of the development, socio-economic impacts are considered positive to moderate, and no significant adverse effects are anticipated. As such, a detailed socio-economic impact assessment is not required. However, it is recommended that the operation continue to prioritise local employment and community engagement to maximise socio-economic benefits.

Plant Species Assessment

Given the transformed nature of the development footprint and ongoing alien invasive plant management, a full specialist Plant Species Assessment is not deemed necessary.

Animal Species Assessment

The Screening Tool rates the site as having high sensitivity under the Animal Species Theme, primarily due to its proximity to the Klein River Estuary that supports faunal movement. However, the five (5) boathouse units were constructed within stilts, minimising development footprint . No evidence of threatened or listed faunal species was observed within the development footprint at the time of site assessments linked to the 2019 Applicability Checklist or the freshwater specialist's 2018 delineation study.

Given the elevated, stilted design of the units, which allows for under-structure movement, and the preservation of surrounding natural habitat, the development poses low risk to terrestrial or estuarine-associated fauna. A full specialist Animal Species Assessment is therefore not considered necessary. However, general faunal protection measures such as the inclusion of permeable fencing, night lighting restrictions, and guest awareness regarding wildlife should be included in the Environmental Management Programme (EMPr) to minimise disturbance and promote long-term ecological functionality.

PRELIMINARY SITE ASSESSMENT

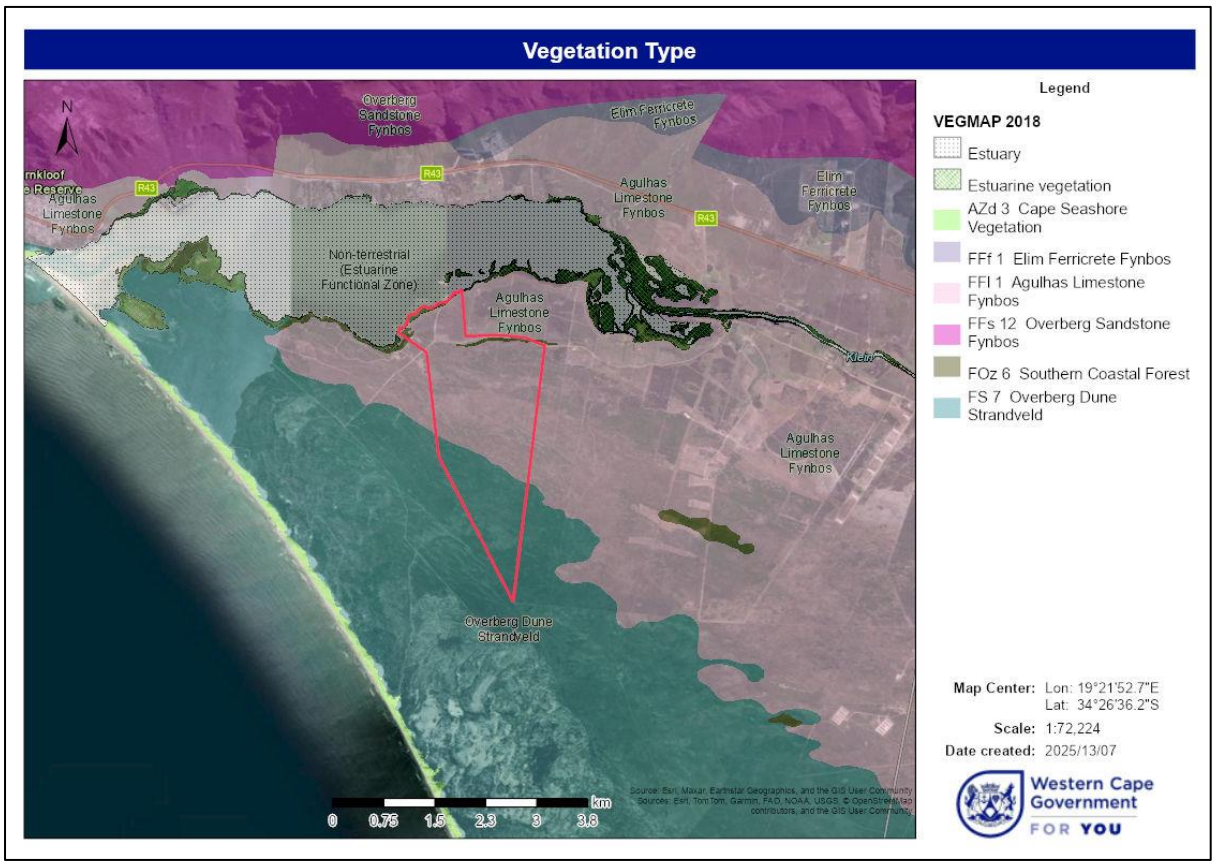

Figure 3: Vegetation type associated with the subject property.

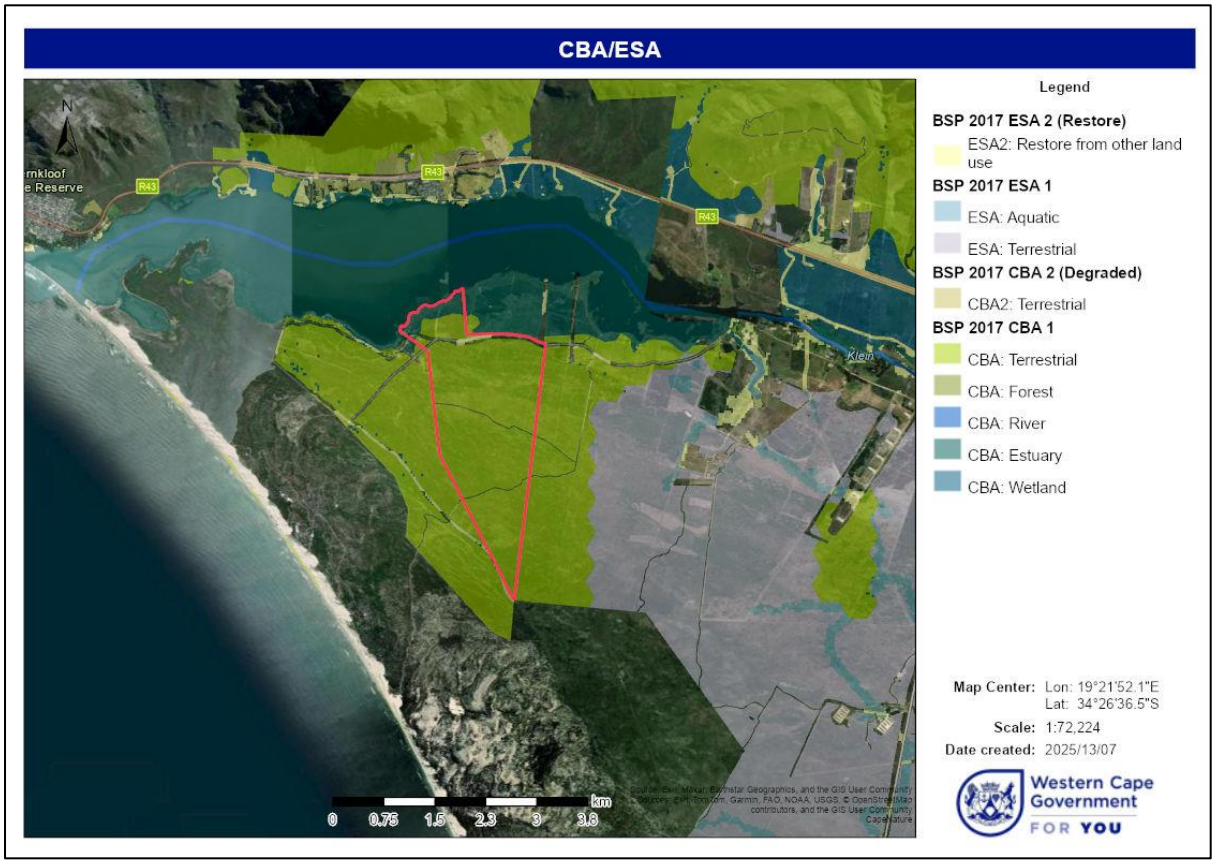

Figure 4: CBA/ ESA Mapping associated with the subject property.

CONCLUSION

This Site Sensitivity Verification Report has been compiled in support of a NEMA Section 24G Application for the retrospective environmental authorisation of five (5) stilted boathouse units and associated infrastructure currently used for tourism accommodation on Portion 1 of the Farm Wortelgat No. 723, near Stanford.

The National Web-Based Environmental Screening Tool identified a range of Very High and High environmental sensitivity themes for the site, including Terrestrial Biodiversity, Aquatic Biodiversity, Plant and Animal Species, and Palaeontology. However, the developed footprint lies outside of delineated wetland areas, and no direct impacts on aquatic ecosystems have occurred.

A comprehensive freshwater specialist study, conducted by Day (2018), confirmed the presence and extent of nearby wetlands and delineated a 32 m buffer zone, which the development respects. The study also evaluated the ecological character of the site and provided mitigation measures to maintain the integrity and function of the surrounding freshwater systems. The assessment concluded that the risk to aquatic features is of low significance, provided that mitigation is implemented. In addition, a botanical assessment conducted by Privett (2019) as part of the Landscape Plan identified the vegetation present within the development footprint as recovering Overberg Dune Strandveld, rather than Agulhas Limestone Fynbos as indicated in the SA Vegetation Map (2018). This reflects the site's post-disturbance recovery status, and no threatened plant species were recorded within the immediate development area.

Site-specific verification confirmed that the development avoided direct disturbance of natural habitat within mapped sensitive areas. The development was constructed on stilts, reducing subsurface disturbance, and no additional vegetation clearance or excavation took place during or after the construction phase.

Based on the outcomes of the screening and verification processes, no additional specialist studies are required at this stage, aside from those already completed. The effective implementation of the recommended mitigation

and management measures, as detailed in the Environmental Management Programme (EMPr), will ensure that potential residual impacts are minimised and that compliance with environmental legislation is achieved.

Kind regards,

MICHELLE NAYLOR