



Site Sensitivity Verification Report

Proposed Residential Development on RE Farm 281, Struisbaai, Cape Agulhas
Municipality, Bredasdorp RD

November 2025

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CLIENT: Helemika Number 1 (Pty) Ltd

TITLE: Site Sensitivity Verification Report for the Proposed
Residential Development on RE281, Struisbaai

REFERENCE: SSVR/281/REV 1

REPORT DATE: November 2025

STATEMENT OF INDEPENDENCE

Lornay Environmental Consultants nor any of the authors of this report have any material present or contingent interest in the outcome of this report, nor do they have any financial or other interest which may affect the independence of the author(s) or Lornay Environmental Consulting. The consultant fees paid to Lornay Environmental Consulting for the completion of this report is in line with standard professional fees and daily rates. The settling of the professional fee is not dependent on the outcome of the report.

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1. INTRODUCTION

The Site Sensitivity Verification Report (SSVR) was taken as a protocol for the proposed residential development of a portion of Remainder Farm 281, Struisbaai, Cape Agulhas Municipality. The subject property is located within the urban edge of Struisbaai, alongside existing residential erven and residential area of Struisbaai, on Main Road, Struisbaai. The split portion of the property affected is 0.71 ha in extent but the overall landholding, from which it is proposed to be rezoned and subdivided into 6 medium residential erven, a private road, 2 open space erven and associated infrastructure.



Figure 1. Locality of subject property

2. ACTIVITY

The subdivision of the subject property to create approximately 6 medium density housing erven, internal road and 2 open space as well as associated infrastructure.

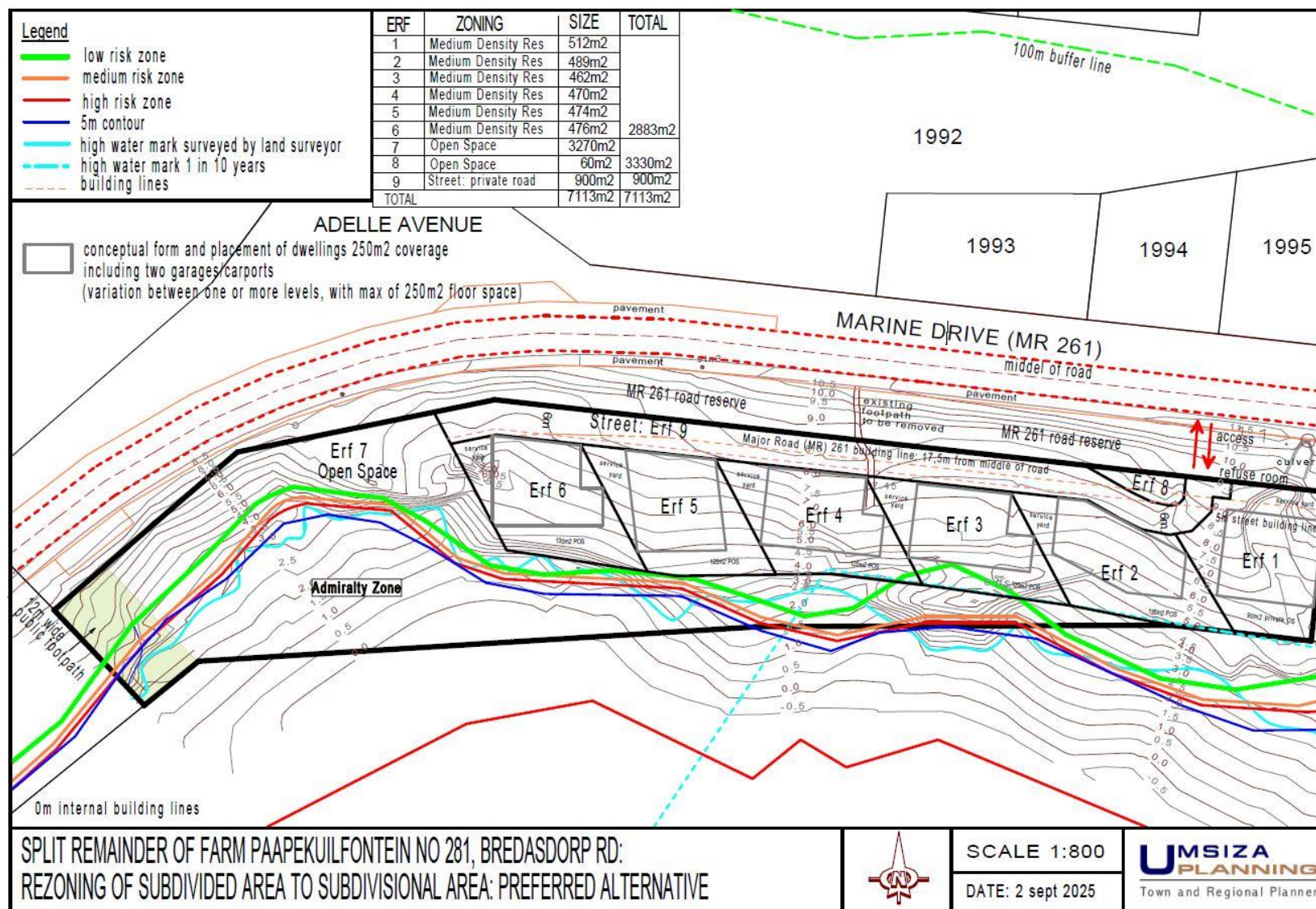


Figure 2. Proposed site development plan.

3. PURPOSE OF THE REPORT

Lornay Environmental Consulting (Pty) Ltd, was appointment by Helemika Number 1 (Pty) Ltd, to undertake the required process in terms of the National Environmental Management Act (Act 107 of 1998) and the Environmental impact Assessment (EIA) Regulations, 2014, as amended, for the proposed residential development on Remainder of the Farm 281, Struisbaai.

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

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			

Agriculture Theme (Low Sensitivity)

The subject property is located within the demarcated urban edge, aligning with surrounding residential developments. Due to its small size, location along the coast and integration into the urban fabric, it is not suitable for farming. No further assessment is required for this theme.

Animal Species Theme (Medium Sensitivity)

The National Web-based Screening tool identified the site as having medium sensitivity for the animal species theme due to potential presence of two animal species of conservation concern. Additionally, another animal species of conservation concern which may likely be present onsite was added by Cape Nature. However, the site survey conducted by Venter (2025) confirmed that none of the animal species of conservation concern were observed onsite during site survey and no evidence of their presence was recorded. Therefore, the site was assessed as having low terrestrial animal sensitivity and no Species of Conservation Concern are expected to be significantly impacted by the proposed development.

Aquatic Biodiversity Theme (Low Sensitivity)

The property is located along the coastal area of Struisbaai, and the National Screening Tool identifies the site as an area of low aquatic biodiversity sensitivity. No freshwater watercourses or natural wetlands are present on or adjacent to the subject erf, and the proposed development activities are situated above the 5 m contour line and outside of the mapped coastal risk zones. As such, the risk of direct impact on aquatic ecosystems is considered negligible.

Archaeological and Cultural Heritage Theme (Low Sensitivity)

The Archaeological Impact Assessment confirmed few traces of archaeological resources during the field survey, which were all graded as having Low (IIC) local significance. The location and description of these archaeological resources are provided in Table 1 and illustrated in Figure 8 of the AIA. Based on these findings, it is concluded that the proposed residential development does not pose a significant threat to local Stone Age archaeological resources.

Civil Aviation Theme (High Sensitivity)

The proposed development is located within the adopted urban edge, as well as the built-up urban edge and is in line with the existing residential development in the area. No further assessment required.

Defence Theme (Low Sensitivity)

The proposed development is in line with the existing residential development in the area. No further assessment required.

Palaeontology Theme (Very High Sensitivity)

According to the South African Heritage Resources Information System (SAHRIS) Paleo-sensitivity Map, the proposed development area is indicated as having Very High palaeontological sensitivity. In line with this rating, a desktop and field-based Palaeontological Impact Assessment (PIA) was undertaken by John Pether (2025) for the proposed seafront development.

The PIA confirmed that the underlying Peninsula Formation (Ordovician age) is rated as High sensitivity due to its potential to contain trace fossils. However, the overlying superficial formations – including the Klein Brak Formation (raised beach deposits) and the Strandveld Formation (aeolian coversands) – were assessed to have Low palaeontological sensitivity in the project area. These deposits may contain fossil shells and occasionally vertebrate remains (marine mammals, seabirds), but such finds are rare and mostly of extant species with limited scientific value.

The PIA concluded that the proposed small-scale development is unlikely to significantly impact palaeontological resources. Nonetheless, because isolated fossil bones or shell deposits could be uncovered during earthworks, a Fossil Finds Procedure (FFP) has been recommended for inclusion in the Environmental Management Programme (EMPr). With the implementation of the recommended mitigation measures (FFP), the impact significance is assessed as Low Negative without mitigation, and Low to Medium Positive with mitigation, due to the potential for fossil recovery and scientific contribution.

Plant Species Theme (Medium Sensitivity)

According to the National Web-based Screening Tool, the site is classified as having medium sensitivity under the Plant Species Theme. This classification is linked to the potential occurrence of plant species of conservation

concern associated with the underlying vegetation types in the study area. To address this, a Terrestrial Biodiversity Impact Assessment was undertaken by Dave McDonald of Bergwind Consulting, specifically covering the Plant Species Theme.

The SA Vegetation Map (2024) identifies two vegetation types within the property, namely Agulhas Limestone Fynbos (CR) on the western side and Southwestern Strandveld (EN) on the eastern side. The botanical specialist noted that Agulhas Limestone Fynbos is restricted to a very small area on the western end of the site, where limestone outcrops occur. However, the majority of the site, and particularly the eastern portion where the development footprint will be concentrated, is dominated by Southwestern Strandveld.

From an ecological sensitivity perspective, the development area on the eastern portion of the property is considered to have low sensitivity vegetation (Southwestern Strandveld). In contrast, the western portion, where a timber walkway is proposed under the preferred layout (Alternative 5), supports vegetation characteristic of Agulhas Limestone Fynbos. However, the placement of the timber walkway has been carefully placed within an already disturbed area, ensuring that no clearance of indigenous vegetation will be required for its placement. The design approach ensures that clearance and loss of vegetation in areas of higher ecological value, specifically the western portion is avoided. Importantly, the botanical survey confirmed that no plant species of conservation concern were recorded on the property during field surveys. As such, the proposed development is not expected to result in significant impacts on plant species of conservation concern.

Terrestrial Biodiversity Theme (Very High Sensitivity)

A Terrestrial Impact Assessment was undertaken by Dave McDonald of Bergwind Consulting to assess the broader terrestrial biodiversity sensitivity of the site. According to the SA Vegetation Map (2024), the property falls within the Agulhas Limestone Fynbos (Critically Endangered) and Southwestern Strandveld (Endangered) vegetation types. Furthermore, the Western Cape Biodiversity Spatial Plan (2017) identifies the western portion of the property as an Ecological Support Area (ESA), highlighting its role in supporting ecological processes and maintaining connectivity. The eastern portion of the site contains patches mapped as Other Natural Areas (ONAs), which, while not formally prioritised for biodiversity conservation, still contribute to the overall natural character of the site.

The eastern portion of the site, where the development footprint is proposed, is classified as supporting low-sensitivity vegetation. In contrast, the western portion of the site, which contains areas of Agulhas Limestone Fynbos, is regarded as being of medium sensitivity. In the preferred layout alternative (Alternative 5), this western section will not be subjected to development activities. The only intervention proposed is the placement of a formal walkway to provide access to the open space. The area identified for the walkway is already disturbed and currently used for access and therefore does not support intact indigenous vegetation. The design ensures that no clearance of vegetation will be required in this section, and disturbance will be confined to the existing transformed footprint.

The botanical survey confirmed that no plant species of conservation concern were identified on the property during site investigations. As such, the proposed development is not anticipated to result in significant residual impacts on terrestrial biodiversity.

Summary of themes and site sensitivities as per online DFFE GIS Mapping Screening Tool:

Specialist Assessments identified for inclusion in the assessment report:

Landscape /Visual Impact Assessment

A Visual Impact Assessment has been undertaken (refer to **Appendix G4**)

Archaeological and Cultural Heritage Impact Assessment

The Heritage Impact Assessment which consisted of the Archaeological Impact Assessment (AIA), Palaeontological Impact Assessment (PIA) and the Visual Impact Assessment (VIA) have been undertaken. The Archaeological Impact Assessment confirmed few traces of archaeological resources that were recorded during the field survey, which were all been graded as having Low (IIIC) local significance. The location and description of these archaeological resources are provided in Table 1 and illustrated in Figure 8 of the AIA. Based on these findings, it is concluded that the proposed residential development does not pose a significant threat to local Stone Age archaeological resources.

Palaeontology Impact Assessment

The PIA concluded that the proposed small-scale development is unlikely to significantly impact palaeontological resources. Nonetheless, because isolated fossil bones or shell deposits could be uncovered during earthworks, a Fossil Finds Procedure (FFP) has been recommended for inclusion in the Environmental Management Programme (EMPr). With the implementation of the recommended mitigation measures (FFP), the impact significance is assessed as Low Negative without mitigation, and Low to Medium Positive with mitigation, due to the potential for fossil recovery and scientific contribution.

Terrestrial Biodiversity Impact Assessment

A Terrestrial and Botanical Assessment was undertaken, forming the basis of the Terrestrial Biodiversity Assessment (see **Appendix G1**).

Aquatic Biodiversity Impact Assessment

The site has no mapped watercourse or wetlands. No further specialist input required.

Socio-Economic Assessment

The proposed development of six residential dwellings will result in limited but positive social and economic benefits for the local community. The scale and nature of the project are consistent with the surrounding land uses and existing residential character of Struisbaai. The evolution of the layout alternatives has addressed concerns relating to coastal access and has allowed for the continued access of the community to the coast and beach at Struisbaai. No further socio-economic specialist assessment is considered necessary.

A Traffic Impact Assessment (TIA) was undertaken to confirm the potential transport implications of the development. Observations indicate that intersections in the vicinity of the site have sufficient capacity to accommodate the small number of additional trips that will be generated as a result of the development. As such, the transport impact is considered negligible, and no specific road upgrades are required, other than provision of an appropriate access point off Marine Drive (see Appendix G7).

Plant Species Assessment

The specialist assessment was covered under the Terrestrial Impact Assessment.

Animal Species Assessment

The Animal Species Compliance Statement was undertaken by Venter, (2025). No animal species of conservation concern were identified during site survey. Therefore, the site has been assessed as having low terrestrial animal sensitivity (see Appendix G8).

4. DESKTOP ANALYSIS

The subject property is located within the municipal urban edge of Struisbaai – refer to map below. In addition, the property is located across Main Road, opposite existing residential and tourism development and therefore by definition, is located within the “**built up urban edge**”.

For this reason, we confirm that the site must be considered as being located within both the municipal urban edge and the built-up urban edge.

The site is vacant and characterised by natural vegetation both indigenous and alien vegetation.

No wetlands or drainage lines are mapped for the property.

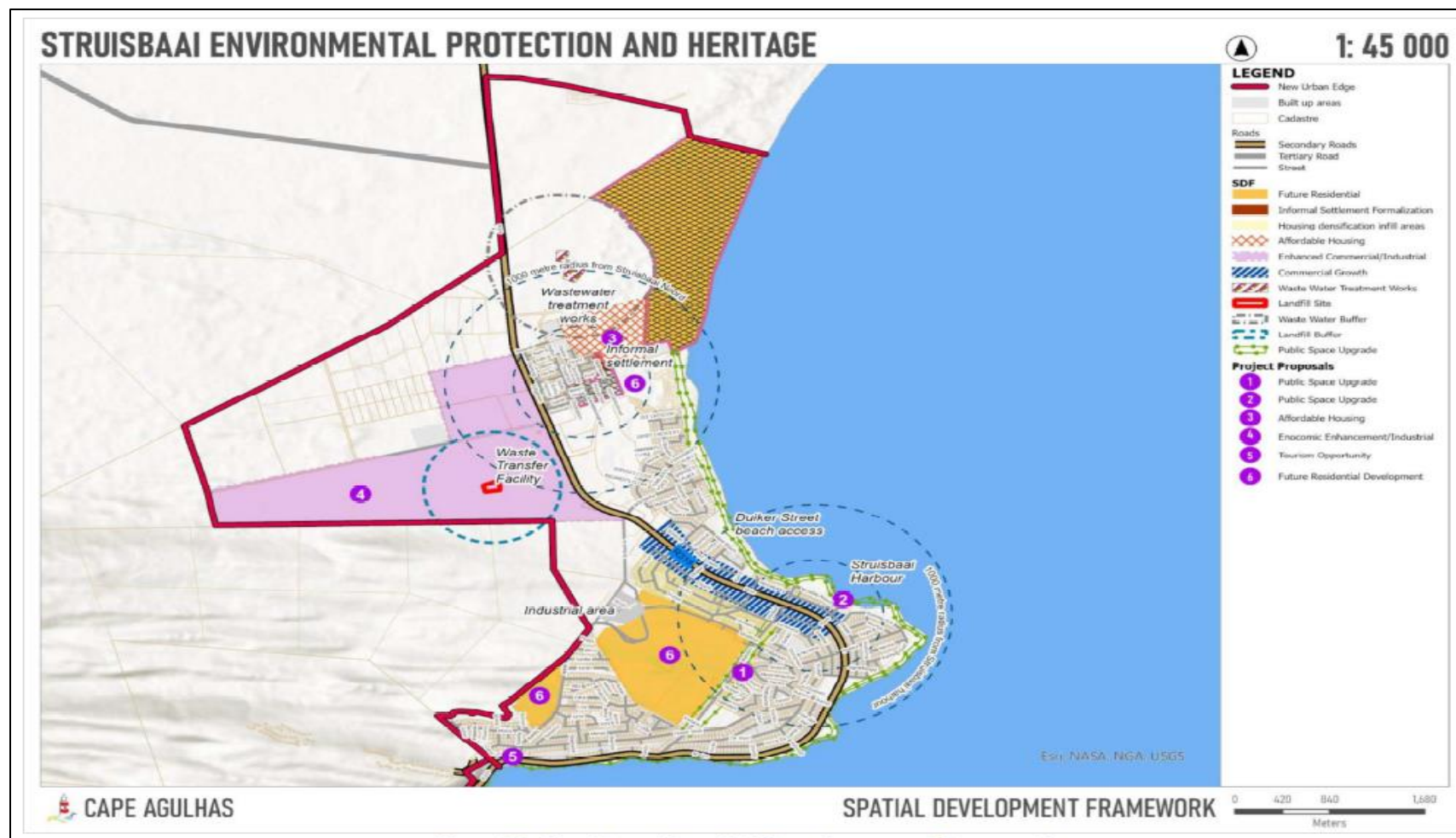


Figure 3. Extract from the Cape Agulhas Spatial Development Framework 2022- 2027 dated 9 March 2023. The area in questions is marked as point 5.

5. PRELIMINARY SITE ASSESSMENT



Figure 4. Aerial view of subject property

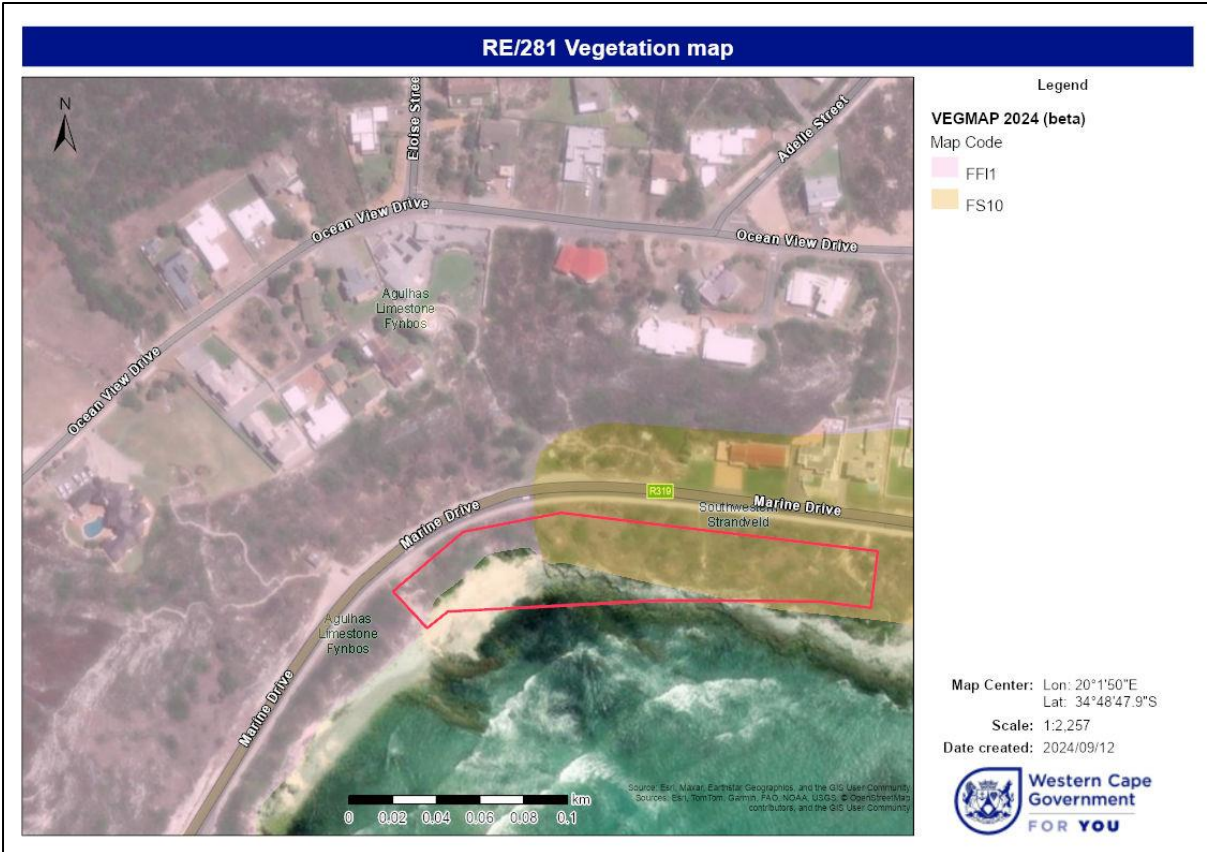


Figure 5. The site is characterised by Southwestern Strandveld and Agulhas Limestone on the western part of the site. No wetlands or drainage lines are mapped on the site or in close proximity. The majority of the built development will be located above the 5 m contour lines. The most western end of the site is marked as an ESA – Coastal Corridor.



Photo 1. Photo taken from Main Road towards the east of the site



Photo 2. Photo taken from Main Road



Photo 3. View of the property looking west

The applicant is aware of the requirements in terms of maintenance of public access and has included an access pathway in the development design.

6. CONCLUSION

The following specialists have / will be appointed as part of the project team

- Heritage Impact Assessment – Complete
- Archaeological Impact Assessment – Complete
- Palaeontological Impact Assessment – Complete
- Visual Impact Assessment - Complete
- Terrestrial Biodiversity Impact Assessment – Complete
- Traffic Impact Assessment – Complete
- Terrestrial Animal Species and Compliance Statement - Complete

No further specialist assessment is recommended.