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Site Sensitivity Verification Report

Proposed Residential Development on Erf 3495, Struisbaai, Cape Agulhas Municipality, Bredasdorp RD

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STATEMENT OF INDEPENDENCE

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CONTENTS

1. INTRODUCTION 6
2. PROPOSED ACTIVITY 6
3. PURPOSE OF THE REPORT AND LEGISLATIVE REQUIREMENTS 8
4. METHODOLOGY 8
5. DESKTOP ANALYSIS AND SITE DESCRIPTION 8
6. SITE SENSITIVITY VERIFICATION 11
7. SPECIALIST STUDIES UNDERTAKEN 16
8. CONCLUSION 17

1. INTRODUCTION

Lornay Environmental Consulting (Pty) Ltd was appointed by Helemika Number 1 (Pty) Ltd to undertake the Basic Assessment process in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), for the proposed residential development on Erf 3495, Struisbaai, Cape Agulhas Municipality, Bredasdorp Registration Division. The development is referred to as Bella Vista.

Erf 3495 is 12.22 ha in extent (deed area 122 244 m²) and is centred on approximately S 34°48'31.9", E 20°02'00.7". The property is located on the south-western edge of Struisbaai, south-west of the Struisbaai Industrial Area and west of the residential area of Struisbaai West. It is bounded by Adelle Street to the east, the municipal water reservoirs and Noreen Street to the south, and the Remainder of Farm Paapekuilsfontein No. 281 (RE/281) to the west and north. The property is zoned Agricultural Zone 1, is vacant and has never been used for agricultural production. It falls within the Struisbaai urban edge and is identified for future residential use in the Cape Agulhas Municipality Spatial Development Framework (2022–2027).

This Site Sensitivity Verification Report (SSVR) records the verification of the environmental sensitivities identified for the property by the National Web-based Environmental Screening Tool, and motivates the specialist assessments that have been undertaken or omitted as part of the Basic Assessment process.

2. PROPOSED ACTIVITY

The application entails the rezoning of Erf 3495 from Agricultural Zone to Subdivisional Area and the subdivision of the property to create a single residential estate. The preferred layout (Alternative 2) provides for the following:

Land use	Erven	Area (% of layout)
Single residential erven	Erven 1 to 71 and 79	6.38 ha (52.6%)
Private streets	Erven 72	1.16 ha (9.6%)
Private open space, including the two 10 m municipal pipeline servitudes and a pocket park	Erven 73 to 78	0.61 ha (5.1%)
Nature Conservation Area: Private Open Space	Erf 80	3.96 ha (32.7%)
Total		121130 m^2

The development footprint, comprising the residential erven, streets and services, is approximately 8.15 ha (67% of the property). The northern portion of the property is retained as Erf 80, a single conservation block that adjoins natural habitat on RE/281 along the western and northern boundaries. Access is proposed from a single stop-controlled access off Adelle Street, approximately 90 m south of Lynn Street. Municipal water and sewer services are available, as confirmed by the Cape Agulhas Municipality in a letter dated 3 October 2025.

The main activities associated with the proposed development include:

- Planning phase: rezoning and subdivision to create residential erven, streets and open space;
- Clearance of indigenous vegetation within the approved development footprint;
- Installation of roads, stormwater, water, sewer and electrical services and other civil works;
- Construction of dwellings on the individual erven;
- Storage and stockpiling of construction materials; and
- Mixing and preparation of construction materials.

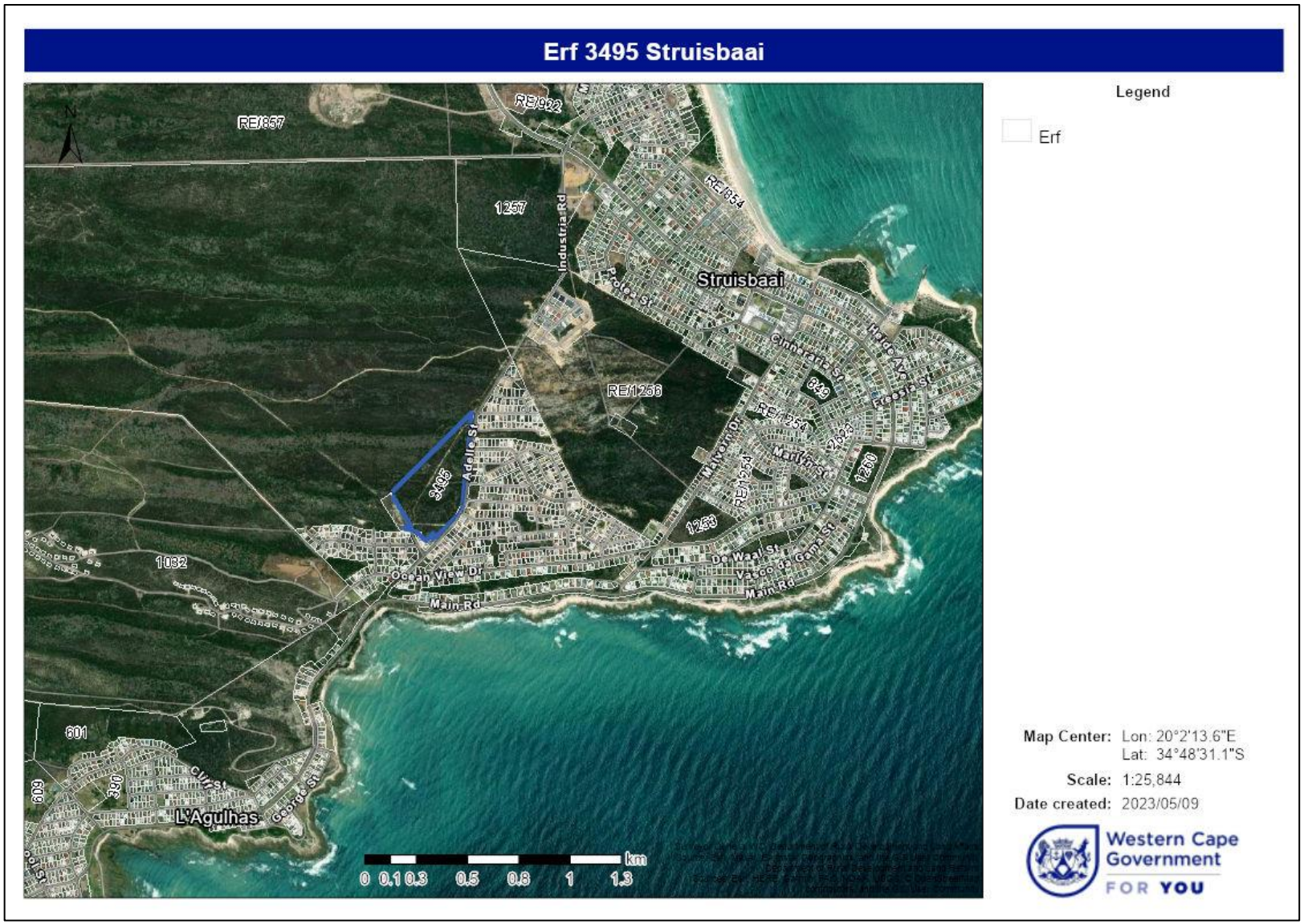


Figure 1. Locality of Erf 3495, Struisbaai.

3. PURPOSE OF THE REPORT AND LEGISLATIVE REQUIREMENTS

In terms of the Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of NEMA (GN 320 of 20 March 2020), and the Protocols for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Animal and Plant Species (GN 1150 of 30 October 2020), the environmental sensitivity of a site identified by the Screening Tool must be confirmed or disputed through a site sensitivity verification prior to the commencement of any specialist assessment.

The site sensitivity verification must be undertaken by an Environmental Assessment Practitioner or a registered specialist, by means of a desktop analysis using satellite imagery, a preliminary on-site inspection and any other available and relevant information. The outcome must be recorded in a report that confirms or disputes the current land use and environmental sensitivity identified by the Screening Tool, includes a motivation and evidence for the verified sensitivity, and is submitted together with the relevant assessment report. This report fulfils that requirement and determines, for each environmental theme, whether a full specialist assessment, a compliance statement or no further assessment is required.

4. METHODOLOGY

The site sensitivity verification was undertaken through a combination of a desktop analysis and on-site inspections by the EAP and the appointed specialists.

Desktop analysis

The National Web-based Environmental Screening Tool report generated for the property was reviewed together with the Western Cape Biodiversity Spatial Plan (2023), the National Vegetation Map (SANBI, 2024), the Red List of Ecosystems remnant layer (SANBI, 2022), the South African Heritage Resources Information System (SAHRIS) palaeosensitivity map, Cape Farm Mapper, historical and current Google Earth Pro imagery, and the Cape Agulhas Municipality Spatial Development Framework (2022/2027).

Site inspections

The site was inspected by the EAP. The botanical specialist surveyed the site on 20 December 2022, 10 November 2023 and 4 October 2026, covering the main flowering period of Agulhas Limestone Fynbos. The faunal specialist surveyed the site, using meandering searches on foot by four observers combined with point surveys, and subsequently undertook a property-wide faunal investigation of the wider Paapekuilsfontein landholding. The agricultural specialist undertook an on-site verification, and the heritage and visual specialists inspected the site and its surrounds to identify heritage resources, significant views and viewpoints.

The findings of the specialist studies listed in Section 7 have been used to confirm or dispute the Screening Tool sensitivity for each environmental theme.

5. DESKTOP ANALYSIS AND SITE DESCRIPTION

5.1 Current land use

The property is vacant and undeveloped. It has not been farmed and remains in a natural state, apart from informal vehicle tracks, two 10 m municipal water pipeline servitudes that cross the site, and a disturbed area adjacent to the municipal reservoirs in the south-west. The surrounding land uses comprise low-density single residential development of one and two storeys to the east and south, and natural fynbos on RE/281 to the west and north.

5.2 Topography, geology and soils

The property occupies a low, rounded rise on the south-western edge of the town. It slopes gently northwards from approximately 65 m above mean sea level near the reservoirs to approximately 30 m above mean sea level at its northern end. The southern and central portions of the property are relatively flat, with a broad crest running roughly east to west, while the northern portion falls steeply towards Santie Street. The property is underlain by the Waenhuiskrans Formation of the Bredasdorp Group, a calcrete-capped Quaternary aeolianite, which crops out as limestone pavements and low ridges and is mantled in places by calcareous sands. The soils are shallow and calcareous, with limited pedological development over hard calcrete, interspersed with pockets of loose sand.

5.3 Climate and hydrology

Struisbaai falls within the winter-rainfall region of the Western Cape, with a mean annual precipitation of approximately 532 mm. No watercourses, wetlands or other aquatic features occur on the property or in its immediate surroundings. Stormwater runoff follows the natural slopes southwards and eastwards towards the existing streets and northwards across Erf 80.

5.4 Vegetation and habitat

The entire property is mapped as Agulhas Limestone Fynbos, a Critically Endangered vegetation type, and almost the entire property is mapped as a Critical Biodiversity Area 1 (CBA1) in the Western Cape Biodiversity Spatial Plan. The vegetation is mid-high to tall proteoid–asteraceous fynbos in fair to good condition. Disturbance is concentrated along the tracks and in stands of the invasive Acacia cyclops, Acacia saligna and Myoporum sp., and in areas where woodcutters have left cut branches in situ. The fynbos is mature and, in places, senescent owing to the long absence of fire.

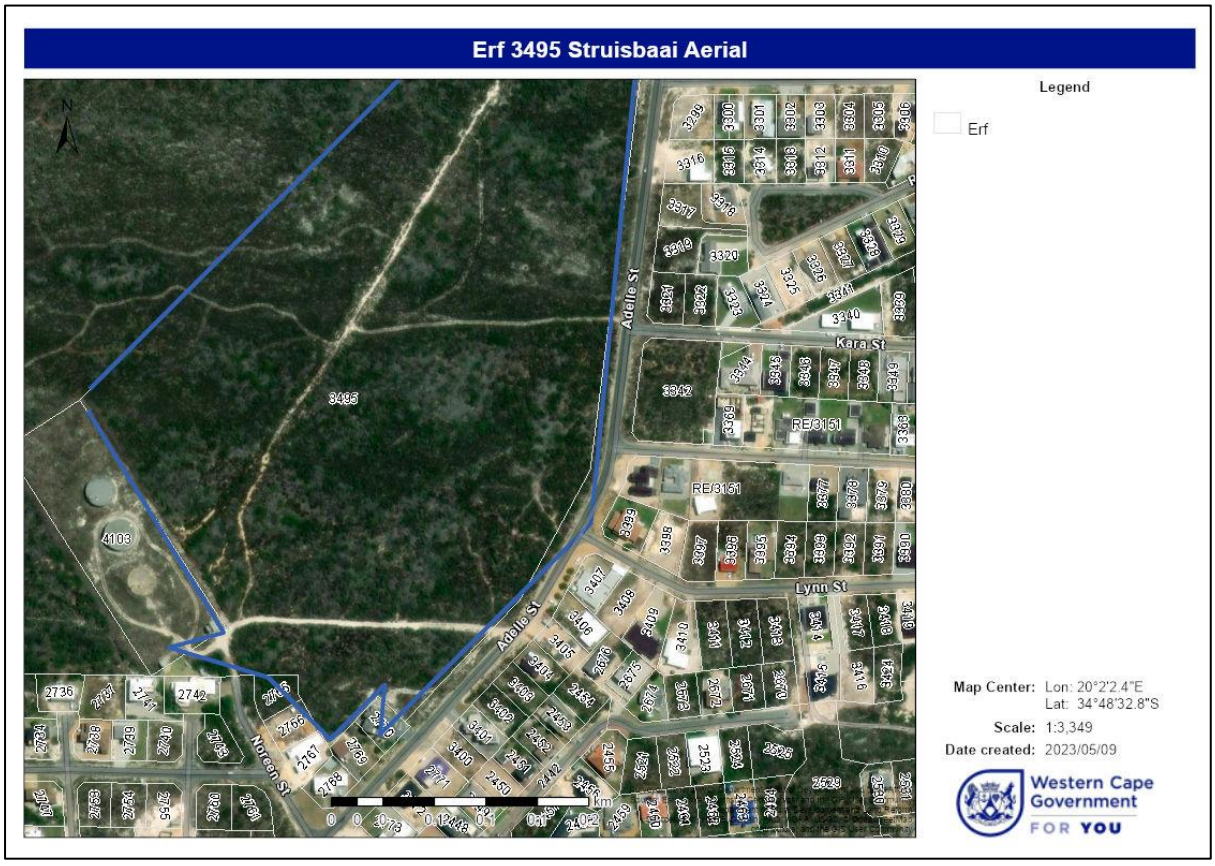


Figure 2. Aerial view of Erf 3495, Struisbaai.



Photo 1. View of the site looking towards the south-west.



Photo 2. View of the site looking towards the north-west.

6. SITE SENSITIVITY VERIFICATION

The Screening Tool sensitivity ratings for each environmental theme, the sensitivity verified through the desktop analysis and site inspections, and the resulting assessment requirement are summarised in Table 1 and discussed below.

Table 1. Summary of the Screening Tool sensitivity, verified sensitivity and assessment requirement for each environmental theme.

Theme	Screening Tool	Verified	Outcome	Assessment undertaken
Agricultural	Medium	Low	Disputed	Agricultural Compliance Statement
Animal Species	High	High	Confirmed	Terrestrial Animal Species (Faunal) Impact Assessment
Aquatic Biodiversity	Low	Low	Confirmed	None required
Archaeological and Cultural Heritage	Very High	Low (archaeological and built heritage)	Disputed in part	Heritage Impact Assessment (Section 38(8) NHRA), incorporating the PIA and VIA
Civil Aviation	High	Low	Disputed	None required
Defence	Low	Low	Confirmed	None required
Palaeontology	Very High	Medium	Disputed	Palaeontological Impact Assessment
Plant Species	High	High	Confirmed	Botanical and Terrestrial Biodiversity Impact Assessment

Theme	Screening Tool	Verified	Outcome	Assessment undertaken
Terrestrial Biodiversity	Very High	Very High	Confirmed	Botanical and Terrestrial Biodiversity Impact Assessment

6.1 Agricultural Theme – Medium Sensitivity

The Screening Tool classifies the site as being of Medium agricultural sensitivity. In accordance with the Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Agricultural Resources (GN 320 of 2020), an Agricultural Compliance Statement was prepared and is appended to the BAR.

The specialist found that the cropping potential of the site is limited by a combination of climatic constraints (arid climate), terrain constraints (steep slopes on old dune topography) and soil constraints (very sandy soils of low water-holding capacity and shallow soils overlying a hardpan horizon). The site and its surroundings have never been used for agricultural production and are unsuitable for viable rain-fed crop production.

On the basis of the on-site verification, the specialist disputed the Medium sensitivity classification of the Screening Tool and verified the entire site as being of Low agricultural sensitivity. An agricultural impact is a change in the future agricultural production potential of land, which in this instance arises from the exclusion of agriculture from the development footprint. The specialist concluded that the development footprint falls below the threshold at which land should be conserved for agricultural production, and that the proposed development will result in a negligible loss of future agricultural production potential. The agricultural impact is therefore of low significance and acceptable. The specialist recommends that the development be approved from an agricultural perspective, without conditions, and no mitigation or monitoring measures are required for inclusion in the EMPr.

6.2 Animal Species Theme – High Sensitivity

The Screening Tool identifies the site as being of High sensitivity for the Animal Species Theme, based on the potential occurrence of eight animal Species of Conservation Concern (SCC), four of which are flagged at High sensitivity and four at Medium sensitivity. As High sensitivity was confirmed, a full Terrestrial Animal Species Specialist Assessment was undertaken by Prof. J.A. Venter (October 2026), rather than a compliance statement.

The site supports Critically Endangered Agulhas Limestone Fynbos and is mapped, together with the wider Paapekuilsfontein property, as CBA1. The vegetation provides foraging, breeding and refuge habitat for a range of fauna associated with the limestone landscapes of the Agulhas Plain. The faunal specialist confirmed that Erf 3495 forms part of a larger connected landscape extending westwards towards Agulhas National Park, rather than an isolated habitat patch. Connectivity is important for mobile species, such as raptors and bustards, which rely on connected natural habitat for movement, dispersal and access to foraging and breeding areas. It is equally important for less mobile species, such as the Southern Adder, Fynbos Buttonquail and Scarce Mountain Copper, which rely on continuity between habitat patches to maintain local populations and to recolonise areas after disturbance such as fire.

The specialist mapped three broad faunal habitats on the site: bottomland habitat in the north, with deeper sandy soils and dense stands of *Acacia cyclops*, sloped habitat, which is rocky and supports restios and *Leucadendron*, and flatland habitat, dominated by limestone rock slabs with restios, Protea and Leucadendron. Species recorded during the survey included Cape Grysbok, Cape Golden Mole, Angulate Tortoise, the Rûens Velvet Worm and a diverse fynbos bird assemblage, including Cape Sugarbird and Orange-breasted Sunbird.

None of the eight Screening Tool SCC was directly observed during the survey. The specialist nevertheless confirmed that the site provides actual or potentially suitable habitat for six of them, as summarised in Table 2.

Table 2. Animal Species of Conservation Concern identified by the Screening Tool and the outcome of the site sensitivity verification.

Species	Screening Tool	Likelihood of occurrence / habitat suitability	Site Ecological Importance
Black Harrier (Circus maurus)	High	Highly suitable foraging habitat and suitable breeding habitat. Recent research-grade records exist in the area.	High
Denham's Bustard (Neotis denhami)	High	Currently moderately unsuitable because the vegetation is long unburnt. Would become highly suitable after fire.	Medium
Southern Black Korhaan (Afrotis afra)	High	Currently suboptimal because the vegetation is dense. Moderate-to-high likelihood of occurrence in the area, with use driven by fire.	Medium
African Marsh Harrier (Circus ranivorus)	High	Unsuitable. There is no wetland habitat on site.	Very Low
Fynbos Buttonquail (Turnix hottentottus)*	Medium	Currently low-to-moderate likelihood. Would become highly suitable two to five years after fire.	Medium
Southern Adder (Bitis armata)	Medium	High likelihood. Suitable rocky limestone fynbos is present, and there are confirmed records from Struisbaai.	High
Scarce Mountain Copper (Trimenia malagrida maryae)	Medium	Possible. The host-plant genera Diosma, Agathosma and Euchaetis are present on the site, and associated ants occur nearby.	High
Yellow-winged Agile Grasshopper (Aneuryphymus montanus)	Medium	Not present. The species is a montane specialist, and the site lies at low elevation near the coast.	Very Low

**The Fynbos Buttonquail is listed as Vulnerable in the Screening Tool but was downlisted to Near Threatened in the 2025 regional Red List.*

The overall Site Ecological Importance of the faunal habitats and ecological processes on the site is High, and the High sensitivity rating of the Screening Tool is therefore confirmed. Under the preferred Alternative 2, the impacts of habitat loss, fragmentation and operational disturbance on faunal connectivity and on the habitat of each SCC with a Medium or High Site Ecological Importance are rated Medium–High Negative before mitigation and Medium Negative after mitigation.

6.3 Aquatic Biodiversity Theme – Low Sensitivity

The Screening Tool classifies the site as being of Low sensitivity for the Aquatic Biodiversity Theme. The desktop analysis and site inspections confirmed that no watercourses, wetlands or other aquatic features occur on the property or in its immediate surroundings. The property occupies elevated ground with no defined drainage lines, and the lowest ground level is approximately 30 m to 35 m above mean sea level. The Low sensitivity is therefore confirmed, and no aquatic biodiversity assessment or compliance statement is required.

6.4 Archaeological and Cultural Heritage Theme – Very High Sensitivity

The Screening Tool identifies the site as being of Very High sensitivity for the Archaeological and Cultural Heritage Theme. Struisbaai and the wider Agulhas area are known for their archaeological and cultural heritage, including the Hotagterklip fishermen's cottages (Provincial Heritage Site), historical fish traps and numerous shipwrecks along the coast. No dedicated assessment protocol has been prescribed for this theme, and heritage resources are therefore assessed in terms of Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA).

A Notification of Intent to Develop (NID) was submitted to Heritage Western Cape (HWC) under Case No. HWC23083108MS0904. In its response, HWC required a Heritage Impact Assessment (HIA) focusing on palaeontology and the visual impact on the cultural landscape, and did not require a separate archaeological assessment. The HIA was compiled by Ms Cindy Postlethwayt, an APHP-accredited heritage practitioner (November 2026), and integrates the Palaeontological Impact Assessment and the Visual Impact Assessment.

The heritage practitioner found that there are no structures on the site and that the site has no intrinsic historical, architectural or archaeological significance. The archaeological sensitivity of the Struisbaai area is generally associated with the coastline, which the site does not adjoin, and no burial grounds or sites associated with slavery are known on the property. The Very High rating is therefore disputed in respect of archaeological and built heritage resources, which are verified as being of Low sensitivity. The heritage value of the site lies mainly in its natural and visual qualities as an open, elevated fynbos ridge at the edge of Struisbaai, within a cultural landscape that the Visual Impact Assessment (November 2026) rates as being of Medium to High significance, and in its palaeontological potential (Section 6.7). These aspects are addressed through the HIA.

6.5 Civil Aviation Theme – High Sensitivity

The Screening Tool identifies the site as being of High sensitivity for the Civil Aviation Theme. This classification is typically applied to areas within proximity of registered airfields, flight paths or aviation infrastructure, where tall structures or certain land uses could interfere with air traffic operations or pose a safety risk. The proposed development comprises single and double storey dwellings with a maximum height of 7.5 m above natural ground level and low-level street lighting. It does not include any tall structures, masts, turbines or land uses that could interfere with civil aviation. The High sensitivity is therefore disputed and verified as Low in respect of the proposed development, and no further assessment is required.

6.6 Defence Theme – Low Sensitivity

The Screening Tool identifies the site as being of Low sensitivity for the Defence Theme. This classification indicates that the proposed development is not located within or near any area of strategic importance to national defence, nor within a zone restricted for defence activities. The Low sensitivity is confirmed, and the proposed development is not expected to interfere with any defence operations or infrastructure. No further assessment is required.

6.7 Palaeontology Theme – Very High Sensitivity

The Screening Tool identifies the site as being of Very High sensitivity for the Palaeontology Theme. The site is underlain by the Waenhuiskrans Formation, a calcrete-capped Quaternary aeolianite that SAHRIS rates as being of Very High palaeontological sensitivity, because fossil bones have previously been found in coastal developments within this formation. In response to the NID, HWC required a Palaeontological Impact Assessment (PIA), which was compiled by Mr John Pether (Pr. Sci. Nat.) (23 October 2026) and is appended to the BAR.

The specialist acknowledged the Very High rating of the Waenhuiskrans Formation, but found that the palaeontological significance of the site is Moderate, for the following reasons:

- Any fossil bones on the site are expected to be of later Quaternary age (approximately 160 000 to 100 000 years old) and would mainly represent animal species that are still living today and are already well known from archaeological sites in the region;
- The site lies on an elevated ridge crest, where springs or vleis, which attract animals and concentrate fossil bones, are unlikely to have occurred;
- Hyaena burrows, which can hold rich bone accumulations, are more likely to occur on eroding slopes than on the flat ridge where development is proposed; and
- The dense fynbos cover means that a surface survey is unlikely to reveal fossils, so the risk can only be managed during excavation.

The development involves shallow excavations, namely house foundations of approximately 0.6 m deep and service trenches of up to approximately 1.2 m deep, which will disturb the capping calcrete and the sands directly beneath it. Fossils may be uncovered and destroyed during construction, and the impact is rated Medium Negative without mitigation. The Very High sensitivity is therefore disputed and verified as Medium. Because fossil locations cannot be predicted and full-time monitoring is not practical, the specialist recommends that a Fossil Finds Procedure be included in the EMPr.

6.8 Plant Species Theme – High Sensitivity

The Screening Tool identifies the site as being of High sensitivity for the Plant Species Theme, with Mimetes saxatilis as the High sensitivity feature and some 40 species and sensitive species codes at Medium sensitivity. A full Botanical and Terrestrial Biodiversity Impact Assessment was undertaken by Dr D.J. McDonald (Pr. Sci. Nat.) of Bergwind Botanical Surveys & Tours CC (October 2026), in accordance with the Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Plant Species (GN 1150 of 2020).

The field surveys confirmed the presence of the following plant SCC and limestone endemics on the property: Mimetes saxatilis (Endangered), Leucospermum patersonii (Vulnerable), Gladiolus miniatus (Vulnerable), Gladiolus variegatus (Vulnerable), Leucadendron meridianum (Near Threatened), Leucadendron muirii (Near Threatened), Protea obtusifolia (Near Threatened) and Leucospermum truncatum (Near Threatened). Mimetes saxatilis is a limestone endemic at the eastern limit of its distribution at Struisbaai and was recorded in the central and eastern parts of the property, within the development footprint. The species cannot be transplanted. The specialist notes that additional SCC are likely to be present, as a comprehensive list would require fieldwork in different seasons over several years. The High sensitivity rating is therefore confirmed.

Alternative 2 has been adopted as the preferred layout. Compared with Alternative 1, it avoids an additional 1.9 ha of habitat and retains 3.96 ha (32.7%) of the property as the Erf 80 Nature Conservation Area, a single block that adjoins natural habitat on RE/281. Development of Alternative 2 will nevertheless result in the permanent loss of approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos and the loss of individuals and habitat of plant SCC within the development footprint, including part of the local Mimetes saxatilis subpopulation. The botanical specialist rates this impact as High Negative before mitigation, reducing to Medium Negative with mitigation, provided that a pre-construction census of Mimetes saxatilis is undertaken and the layout is refined to retain the densest stands where feasible.

6.9 Terrestrial Biodiversity Theme – Very High Sensitivity

The Screening Tool identifies the site as being of Very High sensitivity for the Terrestrial Biodiversity Theme. The rating is triggered by the property's location within Critically Endangered Agulhas Limestone Fynbos, a CBA1, Ecological Support Areas, a focus area of the National Protected Area Expansion Strategy and the buffer of Agulhas National Park.

The site sensitivity verification undertaken by the botanical specialist confirmed the Very High sensitivity rating. The entire property supports Agulhas Limestone Fynbos in fair to good condition, almost the entire property is mapped as CBA1, and the natural vegetation is mapped as a remnant of a Critically Endangered ecosystem in the Red List of Ecosystems. The site is contiguous with natural habitat on RE/281, which extends westwards towards Agulhas National Park. The existing tracks, the pipeline servitudes and the disturbed area near the reservoirs are of lower sensitivity, but they are small and do not alter the overall rating. Invasive alien vegetation and woodcutting debris are degrading parts of the site, and the fynbos is mature and, in places, senescent owing to the long absence of fire.

The proposed development will result in the permanent loss of approximately 8.15 ha of Critically Endangered vegetation and CBA1 habitat under the preferred Alternative 2. The retained habitat will be exposed to edge

effects, including fire exclusion, trampling, dumping, pets, alien plant spread and invasion by the Argentine ant. Alternative 2 limits these impacts by retaining the northern 3.96 ha (Erf 80) as a single conservation block that remains connected to RE/281. With mitigation, the specialist rates the residual loss of habitat as Medium Negative, and the residual impacts of fragmentation and alien invasion as Low Negative. Alternative 1 is not supported, as its residual impacts remain High Negative.

Because a Medium Negative residual impact remains on a Critically Endangered ecosystem and a CBA1, a biodiversity offset must be considered in terms of the National Biodiversity Offset Guideline (DFFE, 2023) and the Western Cape Guideline on Biodiversity Offsets (DEA&DP, 2015). Both the botanical and faunal specialists identify the proposed Struisbaai Conservation Master Plan, which proposes approximately 327 ha of contiguous Agulhas Limestone Fynbos for conservation on RE/281, as the appropriate mechanism to address this residual impact at a landscape scale, subject to the conservation areas being legally secured and managed. The determination of the adequacy of this mechanism rests with the competent authority, informed by CapeNature and SANParks.

6.10 Other recommended specialist studies

Landscape / Visual Impact Assessment. The site occupies an elevated rise at the interface between the town and the open natural landscape of the Agulhas Plain, and HWC required an assessment of the visual impact on the cultural landscape. A Level 4 Visual Impact Assessment was therefore undertaken by Ms Ankia Bormans of Terra+ Landscape Architects (draft, 12 November 2026) and is integrated into the HIA.

Traffic Impact Assessment. A Traffic Impact Assessment was undertaken by Innovative Transport Solutions (Pty) Ltd (ITS 4797.1, 20 October 2026) to assess the access arrangements and the effect of the development on the surrounding road network.

Civil engineering services. A Civil Engineering Roads and Services Report was prepared by Icon Consulting Engineers (Pty) Ltd (Revision 2, October 2026) to confirm the availability and capacity of municipal water, sewer, stormwater, roads and solid waste services.

Socio-Economic Impact Assessment. A specialist socio-economic assessment is not considered necessary. The proposed residential development is located within the urban edge, is consistent with the land use identified in the Cape Agulhas Municipality Spatial Development Framework, involves no displacement of people or loss of existing livelihoods, and is in keeping with the surrounding residential development. Socio-economic impacts are assessed by the EAP in the BAR.

7. SPECIALIST STUDIES UNDERTAKEN

The specialist studies undertaken for the proposed development, in response to the verified site sensitivity, are listed in Table 3 and are appended to the BAR.

Table 3. Specialist studies undertaken for the proposed development.

Specialist study	Specialist	Date
Botanical and Terrestrial Biodiversity Impact Assessment (terrestrial biodiversity and plant species)	Dr D.J. McDonald (Pr. Sci. Nat.), Bergwind Botanical Surveys & Tours CC	October 2026
Terrestrial Animal Species (Faunal) Impact Assessment	Prof. J.A. Venter	October 2026
Agricultural Compliance Statement	SoilZA	September 2026
Heritage Impact Assessment (Section 38(8) NHRA)	Ms C. Postlethwayt (APHP)	November 2026 (draft)
Palaeontological Impact Assessment	Mr J. Pether (Pr. Sci. Nat.)	23 October 2026

Specialist study	Specialist	Date
Visual Impact Assessment	Ms A. Bormans (PrLArch), Terra+ Landscape Architects	18 November 2026 (draft)
Traffic Impact Assessment	Innovative Transport Solutions (Pty) Ltd	20 October 2026
Civil Engineering Roads and Services Report	Icon Consulting Engineers (Pty) Ltd	October 2026 (Revision 2)

8. CONCLUSION

The site sensitivity verification, based on a desktop analysis, site inspections by the EAP and the findings of the appointed specialists, confirms the Very High sensitivity of the site for the Terrestrial Biodiversity Theme and the High sensitivity for the Plant Species and Animal Species Themes. These ratings reflect the presence of Critically Endangered Agulhas Limestone Fynbos within a CBA1, the occurrence of plant Species of Conservation Concern including the Endangered Mimetes saxatilis, the High Site Ecological Importance of the habitat for several faunal Species of Conservation Concern, and the role of the site in maintaining connectivity with the natural landscape extending to Agulhas National Park. Full specialist assessments have therefore been undertaken for these themes.

The Low sensitivity of the site for the Aquatic Biodiversity and Defence Themes is confirmed, and no further assessment is required for these themes. The Medium sensitivity for the Agricultural Theme is disputed and verified as Low, and an Agricultural Compliance Statement has been prepared. The Very High sensitivity for the Palaeontology Theme is disputed and verified as Medium, and a Palaeontological Impact Assessment has been undertaken. The Very High sensitivity for the Archaeological and Cultural Heritage Theme is disputed in respect of archaeological and built heritage resources, and the relevant heritage aspects, namely palaeontology and the visual impact on the cultural landscape, have been addressed through the HIA as required by HWC. The High sensitivity for the Civil Aviation Theme is disputed and verified as Low in respect of the proposed development, and no further assessment is required.

Based on the above, the specialist studies undertaken are appropriate to the verified sensitivity of the site and satisfy the requirements of the applicable assessment protocols. No further specialist input is required at this stage.