



## SITE SENSITIVITY VERIFICATION REPORT

### PROPOSED RESIDENTIAL DWELLING AND GUEST ACCOMODATION UNITS ON ERF 301 HOEKWIL IN WILDERNESS, SOUTH AFRICA.



**10 April 2024**

**Compiled by:** Joclyn Marshall (2022/5006) & Justin Britton (Candidate 2023/6648)

**Reference:** 2024.14.01 – Site Sensitivity Verification Report (SSVR) for Erf 301,  
Wilderness

EAP Signature: \_\_\_\_\_

Candidate Signature: \_\_\_\_\_

**ISSUED BY:**

Eco Route Environmental Consultancy

**Submitted to:**

Jeanne Lisa Holmes

**Document Reference:**

2024.14.01 – Site Sensitivity Verification Report (SSVR) for Erf 301, Wilderness

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**STATEMENT OF INDEPENDENCE**

I, **Joclyn Marshall** of Eco Route Environmental Consultancy, in terms of section 33 of the NEMA, 1998 (Act No. 107 of 1998), as amended, hereby declare that I provide services as an independent Environmental Assessment Practitioner (EAPASA Reg: **2022/5006**) with assistance from Candidate Environmental Assessment Practitioner, **Justin Brittion** (EAPASA Reg: Candidate **2023/6648**) and receive remuneration for services rendered for undertaking tasks required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended). I have no financial or other vested interest in the project.

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# 1. INTRODUCTION

**Eco Route Environmental Consultancy** has been appointed by **Jeanne Lisa Holmes** to undertake a Basic Assessment process to ensure compliance with regulations contained in the National Environmental Management Act (NEMA Act No. 107 of 1998) and the Environmental Impact Assessment Regulations (2014), as amended, for the proposed new dwelling and guest accommodation units on Erf 301, Hoekwil, Wilderness (hereafter referred to as "the property").

## 1.1. PURPOSE OF SITE SENSITIVITY VERIFICATION

Site sensitivity verification in the Basic Assessment process serves the crucial purpose of accurately assessing and documenting the environmental sensitivity of the proposed project site. This involves evaluating various environmental factors in correlation with the environmental screening tool report. Ultimately the main environmental sensitivities are highlighted, and potential specialist assessments are identified.

# 2. LOCATION INFORMATION

Erf 301 is located within the Wilderness area, bordered by Whites Road to the north and Waterside Road to the south. This property spans approximately 3.9 hectares and is situated close to the Touwsriver.

### Western Cape SG information:



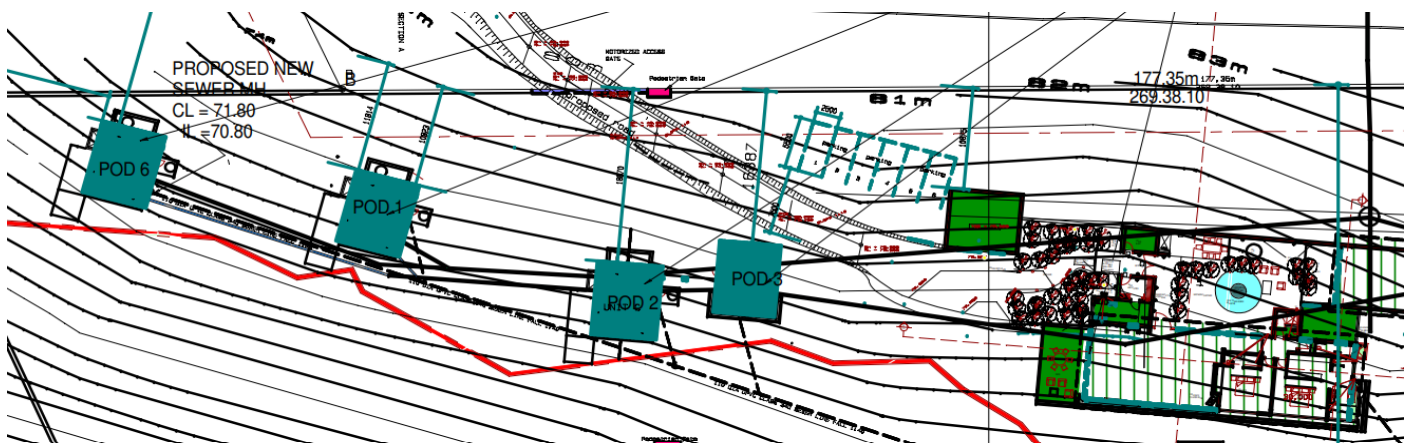
SG Region:	GEORGE
Erf Nr:	301
Area (Sqm):	39222.9
SG Code:	C02700050000030100000



### 3. PROPOSED PROPERTY DEVELOPMENT

the proposed development aims to construct a primary dwelling alongside guest accommodation units with a focus on environmental best practices and adherence to regulatory frameworks. This development goal is to be reached by rezoning the property to Open Space Zone III (nature conservation area).

The proposed development has been indicated to proceed in two phases. First phase will include a 3-bedroom primary dwelling situated towards the north on the current vacant land, adjacent to Whites Road, accompanied by 4 additional guest units that are all identical in size. The second phase will include the finalisation of the last two guest units. Some features of the primary dwelling will include a circular pool with island in the middle, living roof gardens, a braai area with pergola, and patio.



Main access to the development is proposed from the northern boundary of the property leading out of Whites Road. This access can be accommodated for by means of a new road/driveway section of approximately 75m long, cut into the Northern face of the property with a gradual slope from West to East, terminating on a level platform next to the proposed main dwelling and garage section. Internal walkways are proposed between the separate buildings / units leading out of the new driveway / road section.

### 4. ENVIRONMENTAL SCREENING RESULTS AND ASSESSMENT OUTCOMES

As required to compliment a Basic Assessment application the national web-based screening tool was used to generate an environmental screening report. The screening report lists a variety of specialist studies to be undertaken based on the data informants of the tool at the study area. This site sensitivity verification report, following ground-truthing of the site, motivates why certain specialist studies will / will not be required or conducted for the proposed development application.

The following sections contain a summary of any development incentives, restrictions, exclusions, or prohibitions that apply to the proposed development footprint as well as the most environmental sensitive features on the footprint based on the footprint sensitivity screening results for the application classifications that were selected. The application classifications selected for the screening reports are *Transformation of land* | *Indigenous vegetation*.

#### 4.1. Relevant development incentives, restrictions, exclusions, or prohibitions

- South African Conservation Area (SACAD).

#### 4.2. Proposes development area environmental sensitivity

The following summary of the development site environmental sensitivities is identified by the Screening Tool Reports. Only the highest environmental sensitivity is indicated. The environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

**Table 1:** Identified Environmental Sensitivities.

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

#### 4.3. Identified specialist assessments

Based on the selected classification, and the environmental sensitivities of the proposed development footprint, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

**Table 2:** Identified specialist assessments for Transformation of Land Screening Tool Report.

No:	Specialist Assessment	Assessment Protocol
1	Landscape/Visual Impact Assessment	General
2	Archaeological and Cultural Heritage Impact Assessment	General
3	Palaeontology Impact Assessment	General
4	Terrestrial Biodiversity Impact Assessment	Specialist Assessment
5	Aquatic Biodiversity Impact Assessment	None
6	Socio-Economic Assessment	General
7	Plant Species Assessment	Compliance Statement
8	Animal Species Assessment	None

#### 4.4. Results of the verification of the environmental sensitivity and specialist assessments identified of the proposed area

##### i. Landscape/Visual Impact Assessment

A Heritage Statement was compiled by Dr. Nilssen (18 July 2023) for an Erf approximately 360m away from Erf 301 along Whites Road. He states that for reasons given in his study and on heritage grounds, the proposed activity will have negligible to no negative impact on the scenic route (N2) or aesthetic value of the area. He concluded that a Visual Impact Assessment was not warranted in terms of the NHRA. It can be assumed that a similar development located in close proximity would have similar implications.

The development is small scale and will be designed with consideration to the surrounding area and potential visual impacts. The below was taken from the Planning Report by MDB -

The single storey primary dwelling is proposed to have a mono-pitch roof. The primary dwelling structure is accommodated within an 8.5m parallel line with the slope of the property. On the northern elevation (facing Whites Road) the maximum height is  $\pm 4.61\text{m}$ , on the western elevation  $\pm 8.037\text{m}$ , the east elevation  $\pm 7.841\text{m}$  and the south elevation  $\pm 7.069\text{m}$ . The proposed design ensures that the primary dwelling is lower as viewed from the south.

The proposed tourist accommodation units will also have mono pitched roofs, following the topography. The same principles regarding height with the primary dwelling applies to the proposed tourist accommodation units. The wall plate height as measured from NGL for the proposed 6 tourist accommodation units varies between  $\pm 6.336\text{m}$ ,  $6.998\text{m}$  &  $7.480\text{m}$  respectively dependent on the underlying topography.

The primary dwelling and proposed tourist accommodation units is positioned to consider topography, and access and vegetation. Due to the slope and existing vegetation, part of the structures will be hidden by the vegetation. The skyline cannot be broken, and the supporting pillars cannot be visible due to vegetation. What is further of importance is that part of the roof of the proposed primary dwelling will be a living roof.





**Figure 1:** View of the primary dwelling to the right and a few tourist accommodation units to the west (artist impression).



**Figure 2:** A close-up view of two proposed tourist accommodation units.



**Figure 3:** taken from the southwest ( $\pm 700\text{m}$  away from a position south of the N2-route) with the location of Erf 301 Hoekwil marked in a yellow dashed rectangle. It confirms that the skyline cannot be negatively affected by this development proposal and that the structures will sit between the vegetation.



## Recommendations:

Due to the topography and the existing vegetation found on the property, the structures will be hidden in part by the vegetation. The proposed activity will also have negligible to no negative impact on the scenic route (N2) or aesthetic value of the area. It is therefore recommended that no Visual Assessment be undertaken.

A Notice of Intent to Develop (NID) under *Section 38(1)* and (8) of the NHR Act will be submitted to Heritage Western Cape. This will inform any studies required for visual impacts in terms of the NHRA.

## ii. Archaeological and Cultural Heritage Impact Assessment

The screening report indicates that the receiving environment has a **LOW** Relative Archaeological & Cultural Heritage Sensitivity.

A Heritage Statement was compiled by Dr. Nilssen (18 July 2023) for an Erf approximately 360m away from Erf 301 along Whites Road. In his study of the property, he concluded that because of the findings in the Heritage Statement and because there is no reason to believe that significant heritage resources will be impacted by the proposed development on the Erf, it is recommended that no further heritage-related specialist studies (as listed in the NID) are required and that a Heritage Impact Assessment is not warranted for the project. He further stated that the positive socio-economic impact, including some short-, medium- and long-term jobs as well as the provision of accommodation for the tourism industry outweigh the negligible to zero negative impacts this project may have on heritage resources. It is reasonable to assume that the same is applicable to Erf 301.

Some of the findings applicable to the surrounding area in the Heritage Compliance Statement by Dr. Nilssen (18 July 2023) for the nearby Erf, and worth noting include the following:

- ❖ No colonial period heritage resources were identified on record or on the property. Even though none were identified, if present on the property, then isolated Stone Age pieces are considered to be of low heritage value and are Not Conservation Worthy.
- ❖ Due to the absence of significant heritage resources, the proposed activity will have negligible to no cumulative impacts on the archaeological or heritage value of the area.
- ❖ This baseline investigation has shown that, if present, heritage resources on the affected part of the property would be of low significance and given a field rating of Not Conservation Worthy. Since there are no significant heritage resources associated with the proposed development footprint, it does not meaningfully contribute to the cultural landscape of the area.

## Recommendations:

A Notice of Intent to Develop (NID) under *Section 38(1)* and (8) of the NHR Act will be submitted to Heritage Western Cape to determine the requirement of an Archaeological & Cultural Heritage study.

### iii. Palaeontology Impact Assessment

According to the SAHRIS Paleo Sensitivity Map the palaeontological sensitivity of Erf 301 is insignificant/zero, and no palaeontological studies are required.



Colour	Sensitivity	Required Action
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

### Recommendations:

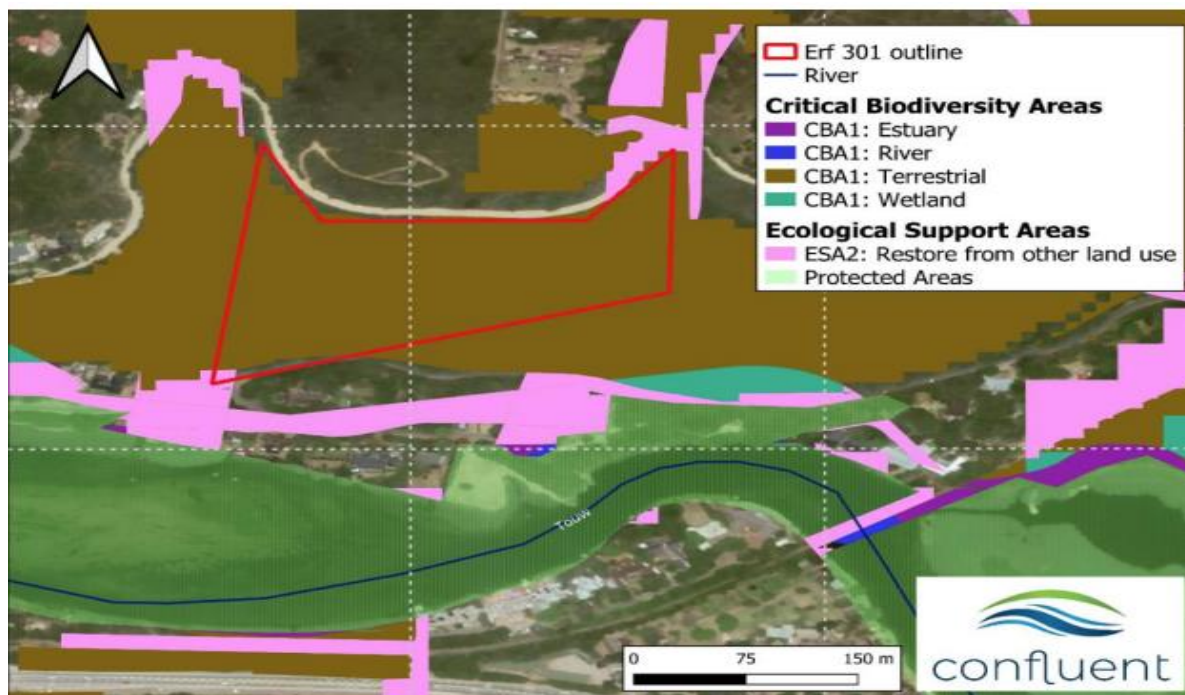
A Notice of Intent to Develop (NID) under Section 38(1) and (8) of the NHR Act will be submitted to Heritage Western Cape to determine the requirement of a palaeontological study.

### iv. Terrestrial Biodiversity Impact Assessment

The screening report indicates that the receiving environment has a **VERY HIGH** Relative Terrestrial Biodiversity Theme.

The terrestrial biodiversity of Erf 301 shows very high sensitivity due to its designation as a Critical Biodiversity Area (CBA 1), an Ecological Support Area (ESA 2), and its inclusion in the Freshwater Ecosystem Priority Areas (FEPA) Sub-catchment. Additionally, it falls within the scope of the National Protected Area Expansion Strategy (NPAES) and the SANParks buffer for the Garden Route National Park. The majority of the area is mapped as a CBA 1 in the Biodiversity Spatial Plan for the Western Cape (WC BSP), with a small portion designated as an ESA 2. The site's proximity to the Touws Protected Area further underscores its importance for conservation efforts. While the proposed development is unlikely to affect the objectives outlined for the CBA, several key reasons support

this conclusion. These include preserving the majority of the site for conservation purposes, the presence of non-perennial drainage lines along its boundaries, and the absence of significant impacts on designated areas like the FEPA River corridor and the Wilderness core estuary. Moreover, the development's location on the south-facing steep slope of Erf 301 ensures minimal disturbance to critically endangered vegetation types, such as Garden Route Granite Fynbos and Wolwedans Grassy Fynbos, which are mapped on the site.



**Figure 4: Terrestrial sensitivities in terms of the Western Cape Biodiversity Conservation Plan (WBCPS) (Confluent, 2023)**

According to the specialist at Confluent (Bianka Fouche, 2023), the sensitivity of the terrestrial biodiversity theme (see figure 7) for the site is confirmed as –

- **Very High** for the “Forest” and “Fynbos on rocky outcrop” habitats on the site. The reasons for the assigned sensitivity are:

The forest on the site would form part of the National Forest Inventory for South Africa. Forests are protected in South Africa, and therefore the forest on the site is a viable CBA 1 area that will be protected by the owner. It has a high terrestrial biodiversity sensitivity. The fynbos on the rocky outcrop can be defined as an isolated section of Garden Route Granite Fynbos, and it therefore has a high sensitivity according to the terrestrial biodiversity protocol.

- **Low** for the “Thicket with some patches of overgrown fynbos” habitat on the site. The reasons for the assigned sensitivity are:

The thicket on the site is not part of a CR ecosystem, and it is not consistent with Garden Route Granite Fynbos for all the reasons mentioned in the Specialist Botanical and Terrestrial Site Sensitivity Verification report by Bianka Fouche, 2023. The aspect of the thicket is on a south facing slope, and fire is unlikely to affect the vegetation here, making all the fynbos elements unviable for conservation efforts. Furthermore, the presence of fynbos nearby, on slope crests and north-facing slopes mean that fynbos seeds are present in the landscape. Fynbos will therefore start to colonise open canopy areas in thicket and forest but are unlikely to remain as thicket pioneer species start to outcompete them.



## Recommendations:

The proposed development will fall outside of the "Forest" and "Fynbos on rocky outcrop" habitats and utilise thicket habitat in the low sensitive areas. It is recommended that the Botanical and Terrestrial Site Sensitivity Verification Report by Bianke Fouche be updated to an assessment as per the protocols of the National Environmental Screening Tool.

## v. Aquatic Biodiversity Impact Assessment

The screening report indicates that the receiving environment has a **VERY HIGH** Relative Aquatic Biodiversity Theme.

Erf 301 is flanked on the east and western boundaries by non-perennial drainage lines that will not be affected by the proposed development. In fact, the sections of these drainage lines on Erf 301 will be protected by the Open Space zonation of the majority of the Erf. The two drainage lines are included in the forest habitat on the site<sup>1</sup>. The site also forms part of the Outeniqua Strategic Water Source Area for surface water runoff.

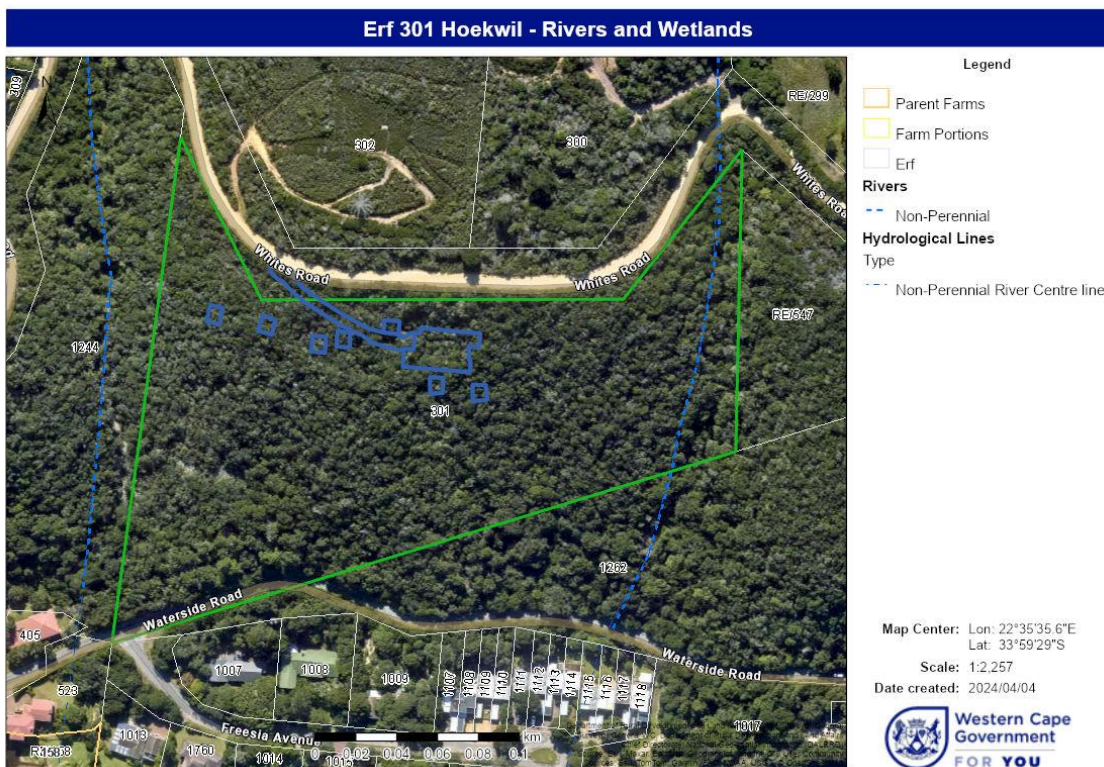


Figure 5: non-perennial drainage lines on the east and western boundaries.

<sup>1</sup> Botanical and Terrestrial SSV by Confluent Environmental, 2023.





**Figure 6:** Non-perennial drainage lines (taken from *Botanical and Terrestrial SSV by Confluent Environmental, 2023*).

**Recommendations:**

The two non-perennial drainage lines will not be affected by the development, the sensitivity should therefore be **LOW**. An Aquatic Biodiversity Assessment is therefore **disputed**, and a Compliance Statement is recommended.

**vi. Socio-Economic Assessment**

Tourism and recreation are ways to achieve economic growth and adds to the sense of place of the greater George municipal area as the gateway to the Garden Route. The GMSDF states that tourism accommodation and uses in varying formats in the urban and rural environments is a generally accepted principle. The proposed development will have socio-economic benefits in maintaining the natural environment and creating employment opportunities. The visitors to this property will support economic opportunities created in the nodes and precincts, e.g. restaurants and recreational facilities in and around the Village of Wilderness.

**Recommendations:**

The Planning Report by Marlize de Bruyn Planning (February 2023) addresses socio-economic aspects. Socio-economic aspects will also be addressed in the Basic Assessment Report and Appendix K. A separate Socio-Economical Assessment for a development of this size and associated impacts is therefore **disputed**.

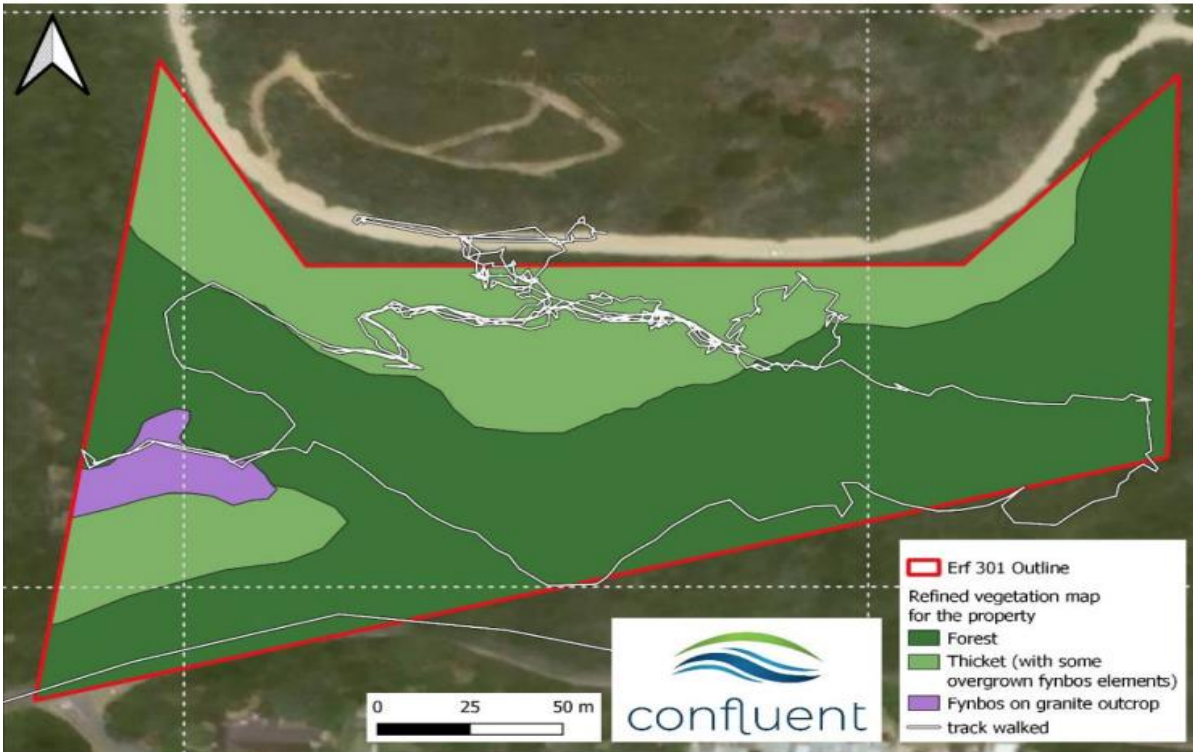
The screening report indicates that the receiving environment has a **MEDIUM** Relative Plant Species Theme. Several Species of Conservation Concern (SCC) have the potential to occur on the site. The SCC that were listed in the screening tool report were:

- *Agathosma muirii*
- *Cotula myriophylloides*
- *Diosma passerinoides*
- *Erica chloroloma*
- *Erica glandulosa* subsp. *fourcadei*
- *Erica glumiflora*
- *Hermannia lavandulifolia*
- *Lampranthus fergusoniae*
- *Lampranthus pauciflorus*
- *Lebeckia gracilis*
- *Leucospermum glabrum*
- *Muraltia knysnaensis*
- *Nanobubon hypogaeum*
- *Selago burchellii*
- *Selago villicaulis*
- *Wahlenbergia polyantha*
- *Zostera capensis*
- Sensitive species 419
- Sensitive species 500
- Sensitive species 657
- Sensitive species 763
- Sensitive species 800
- Sensitive species 1024
- Sensitive species 1032
- Sensitive species 1081

Moderate sensitivity of the plant species theme is based on the presence or likely existence of various plant species of conservation concern (SCC). The specialist report highlights that the Environmental Comment document from January 16, 2023, regarding the permit application for Earthworks and vegetation clearing on Erf 301 in Hoekwil notes the site's designation as a 'terrestrial Critical Biodiversity Area (CBA)' but acknowledges its transition to coastal thicket due to prolonged fire absence. The mapped vegetation includes Garden Route Granite Fynbos and Goukamma Dune Thicket, with the site identified as "Wilderness Fynbos-Forest" and adjacent areas as "Wilderness Grassy Fynbos." Garden Route Granite Fynbos, which is critically endangered due to extensive land use transformation, is now predominantly graminoid fynbos.

The site's sensitivity regarding terrestrial plant species is as follows: **High sensitivity** is confirmed for the "Forest" habitat due to the discovery of a species of conservation concern and the likelihood of several such species occurring there. **Medium sensitivity** is assigned to the "Fynbos on rocky outcrop" area because although conservation concern species are projected to be present, survey coverage was limited, leaving uncertainty. This area wasn't extensively surveyed due to its exclusion from the proposed development, resulting in a medium sensitivity designation. Lastly, "Thicket with some patches of overgrown fynbos" is rated as **Low sensitivity** because no threatened plant species were recorded, with only one protected tree species observed, requiring the owner to obtain a forestry license for management.





**Figure 7:** Revise vegetation map for Erf 301 in Hoekwil (Confluent, 2023).



**Figure 8:** Open canopy pioneer thicket with fynbos elements in the northern section of the south facing slope of Erf 301.

**Recommendations:**

The area proposed for the development is within the “thicket with some patches of overgrown fynbos” that is rated as Low sensitivity. No threatened plant species were identified in this area. It is therefore recommended that Plant Species theme be **LOW**, and a Compliance Statement undertaken.



viii. **Animal Species Assessment**

The screening report indicates that the receiving environment has a **HIGH** Relative Animal Species Theme.

Sensitivity	Feature(s)	Common Name
High	Aves-Circus ranivorus	African Marsh Harrier
High	Aves-Stephanoaetus coronatus	Crowned Eagle
High	Aves-Bradypterus sylvaticus	Knysna Warbler
High	Aves-Hydroprogne caspia	Caspian Tern
Medium	Amphibia-Afrixalus knysnae	Knysna Banana Frog
Medium	Insecta-Aloeides thyra orientis	Brenton Red Russet
Medium	Mammalia-Chlorotalpa duthieae	Duthie's Golden Mole
Medium	Sensitive species 8	-
Medium	Invertebrate-Aneuryphymus montanus	Yellow-winged Agile Grasshopper

It is possible that the forest area on the property may provide suitable habitat for animal species such as the Knysna Warbler (Vulnerable), and Duthie's Golden Mole (Vulnerable). This area will however not be impacted by the development. Camera's setup on the property by the owner identified a number of animal species moving through the lower southern forest section of the property. These included Bush Pig, Porcupine, Cape Genet, Large number of Bush Buck, and a variety of birds.







### Recommendations:

Given the small footprint of the development area relative to the larger property area and the likelihood of SCC occurring on site, it is recommended that the sensitivity for Animal Species is **LOW**, and a Compliance Statement be undertaken.

## ix. Agricultural

The screening report indicates that the receiving environment has a **MEDIUM** Relative Agricultural Theme.

The agricultural theme on the screening tool does not distinguish between agricultural and non-agricultural land. It bases sensitivity only on the general climate, terrain, and soils of the area. It can therefore show high sensitivity even where zero agricultural potential and zero threat of agricultural impact exists, like in the middle of a CBD, for example. The properties limitations for agricultural production are not biophysical in nature but related to land use and zoning<sup>2</sup>.

The property is zoned as Agricultural II, however it is not viable agricultural production land. The property is located in an area with extreme environmental constraints. The southern section of the property is steeper than 1:4 rendering a large portion of the site unusable. The property can have

<sup>2</sup> Correspondence with Johan Lanz (Soil Scientist SACNASP: 400268/12), 18 March 2024.

no agricultural impact because an agricultural impact is, by definition, a change to the agricultural production potential of agricultural land. There can therefore be no agricultural impact if the land is not agricultural land.

A conservation outcome for the property is considered more appropriate for the property. Erf 301 Hoekwil is located in the small holding area of Wilderness Heights as indicated in the WLH LSDF. An area indicated as 'protected areas' together with the Wilderness National Park is located to the south and east of the subject property. By rezoning the property to Open Space Zone III (nature conservation area), it expands the protected area with the appropriate zoning. It should be noted that the abutting Remainder Erf 1262 Wilderness was recently rezoned to Open Space Zone III. This property links with the Wilderness National Park towards the east<sup>3</sup>.



**Figure 9:** Indication of areas with 1:4 slopes, rivers, critical biodiversity area etc in red.

#### **Recommendations:**

Due to the environmental constraints and topography of the site, it is not considered to be viable agricultural production land. It is therefore recommended that no agricultural studies are undertaken.

#### **x. Civil Aviation**

The screening reports indicate that the receiving environment has a **MEDIUM** Sensitivity for this theme as the proposed development property is between 15 and 35 km from a civil aviation radar and major civil aviation aerodrome, and between 8 and 15 km of other civil aviation aerodrome.

<sup>3</sup> Planning Report by MDP, February 2023.

**Recommendations:**

The development will not have any impact on civil aviation as it is a residential development. Aircraft should be restricted from flying low over residential areas. The South African Civil Aviation Authority will be included in the I&AP Register. Comments will be included in the BAR. The sensitivity should therefore be **LOW**, and no further assessments will be required.

**xi. Defence**

The screening reports indicate that the receiving environment has a **LOW** Sensitivity for this theme. As no specific protocol exists for this theme, the General Requirements Protocol is assigned to this sensitivity.

**Recommendations:**

The EAP confirms that the Defence Sensitivity of the proposed development property is **LOW** and no further assessments will be required.