

TECHNICAL OPINION

Technical-Regulatory Framework & Risk Management

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Prepared by	Equipa Técnica CertiAmb

Subject: Development-capacity and purchase-risk review — 55 ha property, São Francisco da Serra, Santiago do Cacém

This demonstration opinion follows the preliminary Property Check for a 55 ha property marketed at €3.3M with an “approved PIP”. Publicly available material supports the existence of several advertised development scenarios, but the municipal PIP file and parcel-level official overlays were not available for this review. The advertised capacities should therefore not be treated as current executable rights until the verification roadmap below is completed.

1. Purpose, scope and limitations

- **Question:** which advertised residential, agricultural and tourism scenarios can safely be relied upon before purchase?
- **Scope:** current municipal planning framework, RJUE effect of prior information, stated environmental/forestry constraints, electricity infrastructure and documentary consistency.
- This opinion is a technical-regulatory demonstration; it is not a municipal approval, legal opinion, cadastral survey or guarantee of licensing.
- **Material assumption:** the online listing correctly reproduces the seller’s summary of a PIP registered on 13/06/2023; the underlying municipal decision has not been independently reviewed.

2. Documents reviewed and missing information

2.1. Documents reviewed

- Idealista listing 33467591, consulted 13/08/2026.
- Santiago do Cacém PDM — municipal publication and current planning documentation.
- Aviso n.º 1869/2025/2 — revision of the Santiago do Cacém PDM.
- Declaração n.º 24/2026/2 — current correction/republished provisions relevant to rural land and tourism.
- RJUE (Decree-Law 555/99), consolidated version in force from 03/08/2026, especially arts. 14 and 17.

2.2. Missing information affecting the conclusions

- Full municipal PIP file, decision, drawings, conditions and external opinions — essential to establish exactly what was decided and its present procedural effect.
- Current Land Registry Certificate and complete urban/rural tax records — required to reconcile title, parcel identity and existing-building areas.
- Georeferenced cadastral/topographic boundary — required for parcel-level overlay and siting analysis.
- Official parcel overlays for REN, EEM, cork/holm oak, wildfire and electricity servitude — required to locate constraints against each development footprint.

- **Evidence of legality/pre-existence of the dwelling and dependency — required before relying on extension rights.**

Method rule applied: seller statements are evidence of what is marketed, not proof of a current development entitlement. Missing official documents define the limits of this opinion and the next diligence steps.

CONFIRMED FACTS VS ASSUMPTIONS MADE

CONFIRMED FACT	SOURCE	ASSUMPTION MADE	TO BE CONFIRMED
Listing: 550,000 m ² ; €3.3M	Idealista listing	Exact registered/cadastral area equals marketed area	Registry + cadastral/topographic verification
PIP registration date stated as 13/06/2023	Idealista listing	PIP remains usable today	Municipal file + current procedural status
PDM currently in force after 2025 revision	CMSC / DR	Parcel categories match seller summary	Official georeferenced PDM overlay
RJUE art. 17 sets a 2-year follow-on deadline	Consolidated RJUE	No intervening act preserved/extended effects	Municipal procedural history

Rule: nothing becomes a fact by repetition. Anything not verified against an official source remains an assumption and is flagged as “to be confirmed”.

3. Description of the proposed operation / subject matter

The buyer is considering acquisition for one of four alternative programmes stated in the listing. No design is assumed. The purpose is to test the legal and spatial dependencies that must be resolved before selecting a programme or committing to the purchase.

PARAMETER	VALUE / ASSUMPTION	SOURCE
Existing dwelling extension	up to 500 m ² — seller/PIP summary	Listing; underlying PIP pending
Agricultural dependencies	up to 5,495 m ² — seller/PIP summary	Listing; underlying PIP pending
TER — Casas de Campo / Agroturismo	up to 4,000 m ² — seller/PIP summary	Listing; underlying PIP pending
Hotel Rural	up to 6,000 m ² — seller/PIP summary	Listing; underlying PIP pending
Tourism impermeabilisation	up to 10,990 m ² — seller/PIP summary	Listing; underlying PIP pending

4. Applicable law and planning instruments over time

The review distinguishes the 2023 PIP context from the planning and procedural rules in force on 13/08/2026. This distinction is material because the PDM was revised in 2025 and the RJUE was amended with effect from 03/08/2026.

INSTRUMENT	CURRENT STATUS	EFFECTIVE DATE	WHY IT MATTERS
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INSTRUMENT	CURRENT STATUS	EFFECTIVE DATE	WHY IT MATTERS
RJUE — DL 555/99, consolidated	In force	03/08/2026 current wording	Arts. 14/17 govern content and effects of favorable prior information.
Santiago do Cacém PDM — Aviso 1869/2025/2	In force	22/01/2025	Replaced the former PDM; governs current rural land uses and parameters.
Declaração 24/2026/2	In force	2026	Corrects/republicises provisions of the revised PDM; must be read with it.
PIP stated as registered 13/06/2023	Status to confirm	13/06/2023	Its exact scope, conditions and present procedural effect require the municipal file.

Decision consequence: more than two years have elapsed since the stated 2023 PIP date. Under current RJUE art. 17(5), the relevant subsequent step must occur within two years of favorable prior information. The municipal file must establish whether the 2023 PIP remains capable of supporting the intended operation and whether any subsequent act affects that conclusion.

5. Planning and regulatory framework

Planning control route / effect of the PIP

RJUE arts. 14 and 17 distinguish the content and effects of favorable prior information. The listing does not show whether the 2023 request was made under art. 14(1) or contained the fuller elements of art. 14(2), nor the notification date or subsequent procedure. Confidence: HIGH on the legal rule; PENDING on its application to this property.

Municipal plan / rural-land parameters

The current PDM regulates isolated development in rural land through arts. 40–43 and tourism through arts. 47 et seq. Art. 43 currently provides a 500 m² maximum for a new owner-farmer residence, subject to cumulative conditions including farmer status and minimum parcel area. This does not by itself verify the listing's "extension to 500 m²" claim, which must be traced to the PIP and the legal status of the existing building. Confidence: MEDIUM-HIGH.

Servitudes and public-law restrictions

The listing itself flags partial REN, cork/holm-oak montado, forest areas, surface-water contamination susceptibility, full inclusion in ecological structure, an electricity distribution line and mixed wildfire-danger classes. These are material siting constraints, but their exact incidence cannot be concluded without a georeferenced parcel boundary and official layers. Confidence: HIGH that the issues are flagged; PENDING as to footprint impact.

Existing buildings / documentary consistency

The listing reports 45 m² dwelling + 16 m² dependency in the urban tax record, while also stating 96 m² covered area in the rural tax record. The discrepancy is material because an extension scenario depends on the lawful identity, use and area of the pre-existing building. No conclusion should be drawn from tax records alone. Confidence: HIGH that a discrepancy is reported; PENDING as to legal built area.

Procedure options and binding effect

Before purchase, obtain the complete PIP title/decision and procedural history from Câmara Municipal de Santiago do Cacém. Only then should the chosen scenario be tested against the current PDM and parcel constraints. If the

commercial decision depends on a specific programme, a new/updated municipal prior-information route may be the proportionate risk-control instrument. Confidence: HIGH as diligence recommendation.

VERIFICATION TABLE

QUESTION	RESULT	SOURCE	CONFIDENCE / RESERVATION
Is 500 m ² residential capacity currently executable?	CONDITIONAL	Listing + current PDM	PIP/pre-existence pending
Can 5,495 m ² agricultural support be relied upon?	NO — not yet	Listing only for parcel claim	PIP + current category/conditions pending
Can TER 4,000 m ² be relied upon?	NO — not yet	Listing + current PDM framework	PIP + ZEPT/category/constraints pending
Can Hotel Rural 6,000 m ² be relied upon?	NO — not yet	Listing only for parcel claim	PIP + current PDM route pending
Do constraints affect buildable siting?	YES — potentially	Listing + PDM framework	Exact overlay pending

6. Relevant connected regimes

- **Forestry / cork and holm oak:** tree-protection rules may constrain clearing, access and siting; inventory and specialist confirmation required.
- **REN / ecological structure:** compatibility depends on exact mapped incidence and the proposed operation; parcel overlay required.
- **Water and wastewater:** a tourism/agricultural programme requires infrastructure and treatment feasibility; no capacity assessment was available.
- **Electricity distribution line:** confirm operator, easement corridor and required clearances before fixing any footprint.
- **Wildfire:** current hazard/management obligations must be checked against the current official cartography, not the listing's 2022 map alone.

7. Technical analysis / calculations where applicable

No engineering design calculation is asserted as verified. The arithmetic below only reproduces seller-stated figures to expose where a numerical claim is not the same as a legal entitlement.

CALCULATION / CHECK	INPUT	RESULT	INTERPRETATION
Agricultural figure	549,500 m ² × 0.01	5,495 m ²	Arithmetic matches listing; legal applicability not verified.

CALCULATION / CHECK	INPUT	RESULT	INTERPRETATION
Tourism impermeabilisation	549,500 m ² × 0.02	10,990 m ²	Listing text says ×0.2, but 10,990 equals ×0.02; source inconsistency to clarify.
Dwelling tax areas	45 + 16 m ²	61 m ²	Does not reconcile with separately stated 96 m ² rural covered area.
TER capacity	Seller states 4,000 m ²	Not recalculated	Requires current PDM/PIP basis.
Hotel Rural capacity	Seller states 6,000 m ²	Not recalculated	Requires current PDM/PIP basis.

8. Risk matrix

RISK	PROBABILITY	SEVERITY	LEVEL	TYPICAL CONSEQUENCE
PIP no longer supports purchase case	High	Very high	CRITICAL	Advertised capacity may not be executable.
Existing-area mismatch	High	High	HIGH	Residential extension baseline may change.
REN / EEM footprint conflict	Medium	Very high	HIGH	Siting or usable footprint may be reduced.
Montado / protected trees	Medium	High	HIGH	Clearing/access/building layout constrained.
Tourism route under current PDM	Medium	Very high	HIGH	4,000/6,000 m ² scenario may need redesign/new procedure.
Electricity servitude	Medium	Medium	MODERATE	Setbacks may affect preferred siting.
Wildfire / infrastructure feasibility	Medium	High	HIGH	Additional design, access and safety obligations.

9. Opportunities / alternative solutions

Residential-first scenario

If the lawful pre-existence and PIP basis are confirmed, a lower-intensity residential programme may reduce exposure to tourism-specific constraints. It still requires proof of the existing building and current procedural route.

Agricultural-led scenario

Agricultural use may align with the rural character, but the 5,495 m² figure should not be priced into the acquisition until the applicable category, operational need and PIP basis are verified.

TER / agrotourism scenario

Potentially relevant under the rural-tourism framework, but current PDM location rules, ZEPT status and environmental overlays must be tested before capacity is assumed.

Hotel Rural scenario

Highest advertised construction capacity, but also the scenario most exposed to tourism rules, landscape integration, infrastructure and siting constraints. Treat 6,000 m² as an unverified ceiling, not a bankable right.

10. Risk mitigation measures

RISK TO MITIGATE	MEASURE	TIMING
PIP status	Obtain complete municipal PIP file and procedural history.	Before purchase
Title / area mismatch	Reconcile registry, tax records and georeferenced survey.	Before CPCV
Existing building legality	Obtain licensing/pre-1951/other lawful-pre-existence evidence as applicable.	Before CPCV
REN / EEM	Overlay official current layers on parcel and candidate footprints.	Before design / purchase
Montado	Tree inventory + applicable protection assessment.	Before design / purchase
Tourism capacity	Run scenario-specific current-PDM test and, if needed, municipal PIP.	Before purchase commitment
Electricity line	Confirm operator servitude and clearances.	Before design

RISK TO MITIGATE	MEASURE	TIMING
Wildfire / utilities	Current wildfire + access + water/wastewater feasibility review.	Before final investment decision

11. Conclusion and verification roadmap

Conclusion: the property has credible evidence of substantial development potential, but the advertised 500 / 5,495 / 4,000 / 6,000 m² alternatives are not sufficiently verified to be treated as current purchase assumptions. The decisive issue is not whether a PIP was once favorable, but exactly what it approved, its present procedural effect, and whether each proposed footprint remains compatible with the current PDM and parcel-level restrictions. A purchase decision based on development capacity should be deferred until G1–G5 are completed.

VERIFICATION ROADMAP

STEP	DILIGENCE	INSTRUMENT / RESPONSIBLE	DEPENDENCY / TIMING
G1	Obtain full PIP + decision + drawings + opinions	CMSC / seller	First; gates all capacity conclusions
G2	Reconcile title, tax records and lawful pre-existence	Registry + AT + CMSC	Parallel with G1; before CPCV
G3	Georeference parcel and current official constraints	Survey + official GIS	After parcel identity fixed
G4	Test 4 scenarios against current PDM	CertiAmb technical/planning review	Depends on G1–G3
G5	Confirm external constraints / utilities	APA/forestry/operator/others as applicable	Depends on candidate footprint
G6	Select route: proceed / renegotiate / new PIP / withdraw	Buyer + technical team	Final purchase gate

G1–G3 establish the evidence base; G4–G5 establish scenario-specific feasibility. A final capacity-dependent purchase decision should only be made after those gates, or the CPCV should expressly protect the buyer through appropriate technical/municipal conditions.

12. Reservations

- The municipal PIP decision itself was not available; its exact content and legal effect are therefore not asserted.
- The listing's PIP date is a registration date; the favorable-decision/notification date has not been independently established.
- Exact parcel geometry and official current overlays were not available; constraint incidence is not mapped in this opinion.
- The legality, use and area of the existing buildings are not established by the listing or tax-area statements alone.
- The 4,000 m² TER and 6,000 m² Hotel Rural figures are seller/PIP-summary claims, not independently confirmed current capacities.
- The listing's impermeabilisation formula is internally inconsistent: 10,990 m² corresponds to 2% of 549,500 m², not 20%.
- This demonstration uses public information available on 13/08/2026 and is not a substitute for a commissioned parcel-specific opinion based on the complete file.

This opinion is prepared on the basis of the information identified in section 2 and reflects the law and planning instruments in force on the stated review date. It does not replace legally required permits, approvals, specialist designs or opinions from competent authorities.

This document does not constitute legal advice. It is a technical and regulatory analysis; it does not replace acts or decisions of the competent authorities and it does not guarantee municipal approval or licensing. It refers to the law and territorial planning instruments checked on the stated date.

This document was created exclusively for demonstration purposes.