

THE PROPOSED DEVELOPMENT OF THE OUTENIKUASBOSCH SAFARI PARK ON FARM OUTENIKUASBOSCH 149 AND FARM HARTENBOS 217, HARTENBOS.

EXTERNAL ENVIRONMENTAL AUDIT REPORT IN TERMS
OF REGULATION 34 OF THE NEMA EIA REGULATIONS,
2014 (AS AMENDED).

INITIAL DEA&DP EIA REF. NO. EG12/2/3/4-D6/17-1444/09
APPEAL EA REF. NO. M3/6/5
AMENDMENT EA REF. NO. 14/3/1/1/D6/18/0574/22



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KAPPEC

08 November 2024

DETAILS OF THIS REPORT

Status of this Report	Final Regulation 34 External Compliance Audit Report
Date Submitted	08 November 2024
Public Review Period	Not Applicable
Report Title	The Proposed Development of the Outeniquasbosch Safari Park on Farm Outeniquasbosch 149 and Farm Hartenbos 217, Hartenbos.
Applicant	Mr. P.D. van Zyl Zec 4 (Pty) Ltd P.O.Box 154 Hartenbos 6520
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 The logo for KAPP Environmental Consultants features a stylized green leaf and blue water droplet icon to the left of the word 'KAPP' in large, bold, dark grey letters. Below 'KAPP' is the text 'ENVIRONMENTAL CONSULTANTS' in a smaller, dark grey, all-caps font.	

DISCLAIMER

This report has been prepared for Zec 4 (Pty) Ltd represented by Mr. Dreyer van Zyl and is subject to and issued in accordance with the agreement with Kapp Environmental Consultant (Pty) Ltd. (KAPPEC).

The opinions expressed in this report have been based on the information supplied to KAPPEC by the Client and the relevant Environmental Assessment Practitioner. The Author has exercised all due care in reviewing the supplied information, but conclusions from the review are reliant on the accuracy and completeness of the supplied data. KAPPEC does not accept responsibility for any errors or omissions in the supplied information and does not accept any consequential liability arising from commercial decisions or actions resulting from them. KAPPEC accepts no liability or responsibility whatsoever for it in respect of any use of or reliance upon this report by any third party.

Opinions presented in this report apply to the site conditions and features as they existed at the time of the writing of this report, and those reasonably foreseeable.

Copying of this report without the permission of the Client and KAPPEC is not permitted.

LETTER OF UNDERTAKING AND STATEMENT OF INDEPENDENCE

I Renier Kapp, as the appointed independent Environmental Assessment Practitioner (EAP) hereby declare that I:

- Will perform the work relating to the appointment in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- Other than fair remuneration for work performed/to be performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity;
- Work performed for this study was done in an objective manner irrespective of how such findings may be favourable or not to the applicant;
- declare that there are no circumstances that may compromise my objectivity in performing such work;
- All facts and findings will be presented in an objective manner in accordance with my professional experience and information derived from the study;
- have expertise in conducting the independent audit, including knowledge of the relevant legislation and any guidelines that have relevance to the development; and
- All particulars furnished in this report are true and correct.



(Renier Kapp)

Signature of the Principle Environmental Assessment Practitioner

Kapp Environmental Consultants (Pty) Ltd (KAPPEC)

Name of Company

08 November 2024

Date

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ABBREVIATIONS

MMP	Maintenance Management Plan
DEFF	Department of Environment, Forestry and Fisheries
DWS	Department of Water Affairs and Sanitation
EA	Environmental Authorization
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMP	Environmental Management Programme
DEO	Designated Environmental Officer
KAPPEC	Kapp Environmental Consultants
I&AP	Interested and Affected Parties
RE	Resident Engineer

APPENDICES

Appendix A:	Site Photographs
Appendix B:	Site Development Plan
Appendix C:	Copy of Original EA
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INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed by Zec 4 (Pty) Ltd (Applicant) as the independent environmental assessment practitioners to undertake an external compliance audit in fulfilment of Condition 15 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

A partial Environmental Authorisation (EA) and exemption was granted to Mr. Dreyer van Zyl on October 8, 2013 (DEA&DP EIA Ref: EG12/2/3/4-D6/17-1444/09) in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) and the Environmental Impact Assessment Regulations, 2010. An appeal against the partial Environmental Authorisation was lodged, and an updated appeal EA (M 3/6/5) to authorize the entire Preferred Layout Alternative D was granted on the 24th of November 2014.

Thereafter, an application for the amendment of the appeal EA was submitted on the 28th of January 2022 and subsequently granted by the Western Cape Minister of Local Government on the 25th of May 2022 with DEA&DP EIA Ref: 14/3/1/1/D6/18/0574/22. The purpose of the amendment application included the replacing of the activity description, as well as the transfer of the rights and obligations of the Environmental Authorisation from Mr Dreyer van Zyl to Zec4 (Pty) Ltd.

This external audit, conducted in alignment with the National Environmental Management Act (NEMA), is to increase the contractor's compliance rating in terms of the approved Environmental Authorization and the EMPr. The body of this report will incorporate the auditable conditions and requirements contained in both the EA and the EMP. The conditions of the EA have been summarized in the report including its corresponding level of compliance with each condition.

The methodology followed for conducting the environmental audit included:

- Compilation of background information for site visit
- Site Visit
- Documentation audit
- Compilation of environmental audit report
- Submission of environmental audit report

The items have been included in table format and compliance will be indicated based on assigned colour significance as per Table 1 below:

TABLE 1: COMPLIANCE RATING

Colour	Compliance Rating Significance
GREY	A grey item indicates that a compliance rating is not relevant. Item is listed for awareness although will not/cannot be rated.
GREEN	An item is marked green to indicate complete compliance in line with the EMP.
YELLOW	An item is marked yellow to indicate sufficient compliance although possibly not as prescribed in the EMP.
ORANGE	An item is marked orange to indicate a non-compliance although the resulting impact is not deemed significant.
RED	An item is marked red to indicate a significant or ongoing non-compliance which needs to be addressed as per the EAP instruction.

PROJECT DESCRIPTION

The Outeniquasbosch development project involves the establishment of a mixed-use residential and tourism complex, incorporating the following key elements:

Residential Development:

- A combination of high, medium, and low-density residential units designed to cater to diverse housing needs.
- A dedicated staff village to accommodate workers involved in the development and ongoing operations.

Hotel and Conference Facility:

- A two-story hotel and conference centre with a combined maximum footprint of 500 m².
- The hotel and conference centre will be complemented by 50 resort units, each with a maximum footprint of 120 m².
- These facilities will be confined to the designated "hotel and conference centre footprint" identified in the approved layout plan on June 2011 (DRG NR: PR04/17/L13) as Erf 545.

Business and Commercial Centre:

A commercial hub to serve both residents and visitors, enhancing the economic potential of the development.

Equestrian Centre:

A facility dedicated to equestrian activities, providing a unique recreational offering within the development.

Private Open Spaces:

Carefully planned green spaces for leisure and recreation, contributing to the overall quality of life within the community.

Private Roads:

A network of private roads ensures efficient access and connectivity throughout the development.

Educational Facility:

A designated educational institution to support the local community, ensuring access to education within the development.

According to the appeal EA, the entire preferred Alternative D project description should be authorised whose activities entail the following:

- 53 Resort units (approximately 350m² per erf);
- 372 Single residential erven
- 97 Medium density group housing (approximately 400m² per erf);
- 18 Medium density farm worker accommodation (approximately 400m² per erf);

- 1 Hotel and conference facilities;
- 2 Local businesses;
- 1 Institution (education) facility;
- Private open space; and
- Private roads

After the amendment application was received the following description and final project description follow;

- ***42 Resort units (approximately 350m² per erf);***
- ***249 Single residential erven, including the 18 farm worker accommodation units;***
- ***173 General Residential Zone 1;***
- ***1 General Residential Zone V (hotel and conference facility);***
- ***2 Business Zone II;***
- ***1 Institution (education) facility = Community Zone I;***
- ***2 Utility Zone I (reservoir);***
- ***1 Industrial Zone I (storage);***
- ***Private open space; and***
- ***Private roads***

Environmental Compliance:

This project has undergone an environmental impact assessment, and several components have been approved as per the Final Environmental Impact Report submitted in May 2013. Certain elements, including the northern section of the proposed residential development (Erven 87-300) and resort units (Erven 472-544), were excluded from the approved plan.

Departmental Refusal:

The Department has refused development north of Erven 162-168, the clubhouse, and the northern boundary of the neighbouring Monte Christo development. However, the proposed equestrian centre, hotel and conference centre, and resort units have been approved in this area.

Location:

The development is situated on Farm Outeniquasbosch No. 149, including Portions 16, and the Remainder of Portions 9 and 15, as well as Farm Hartenbos No. 27, Portions 10 and 28, in Hartenbos.

LISTED ACTIVITIES

The Amended EA subsequently authorised the applicant to undertake the underneath **listed activities**:

Government Notice No. R386 of 21 April 2006

Activity 1(k):

Activity Description:

The construction of facilities or infrastructure, including associated structures or infrastructure, for the bulk transportation of sewage or water, including stormwater, in pipelines with:

- i) an internal diameter of 0.36 meters or more; or
- ii) a peak throughput of 120 liters per second or more.

Activity 1(m):

Activity Description:

The construction of facilities or infrastructure, including associated structures or infrastructure, within the one in 10-year floodline of a river or stream, or within 32 meters from the bank of a river or stream where the floodline is unknown, excluding purposes associated with existing residential use, including:

- i) canals;
- ii) channels;
- iii) bridges;
- iv) dams;
- v) weirs.

Activity 12:

Activity Description:

The transformation or removal of indigenous vegetation of 3 hectares or more, or of any size where the transformation or removal would occur within a critically endangered or endangered ecosystem listed in terms of Section 52 of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).

Activity 15:

Activity Description:

The construction of a road that is wider than 4 meters or has a reserve wider than 6 meters, excluding roads that fall within the ambit of another listed activity, or which are access roads of less than 30 meters long.

Activity 16:Activity Description:

The transformation of undeveloped, vacant, or derelict land to:

- a) establish infill development covering an area of 5 hectares or more, but less than 20 hectares; or
- b) residential, mixed, retail, commercial, industrial, or institutional use where such development does not constitute infill and where the total area to be transformed is larger than 1 hectare.

Activity 18:Activity Description:

The subdivision of portions of land 9 hectares or larger into portions of 5 hectares or smaller.

Government Notice No. R387 of 21 April 2006**Activity 2:**Activity Description:

Any development activity, including associated structures and infrastructure, where the total area of the developed area is, or is intended to be, 20 hectares or more.

Government Notice No. R544 of 18 June 2010**Activity Number: 11:**Activity Description:

The construction of:

- i) canals;
- ii) channels;
- iii) bridges;
- iv) dams;
- v) bulk stormwater outlet structures;
- vi) marinas;
- vii) jetties exceeding 50 square meters in size;
- viii) slipways exceeding 70 square meters in size;
- ix) buildings exceeding 50 square meters in size; or
- x) infrastructure or structures covering 50 square meters or more,

where such construction occurs within a watercourse or within 32 meters of a watercourse, measured from the edge of a watercourse, excluding where such construction will occur behind the development setback line.

Activity Number: 18:Activity Description:

The infilling or depositing of any material of more than 5 cubic meters into, or the dredging, excavation, removal, or moving of soil, sand, shells, shell grit, pebbles, or rock from:

- i) a watercourse;
- ii) the sea;
- iii) the seashore;
- iv) the littoral active zone; an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater-
but excluding where such infilling, depositing, dredging, excavation, removal or moving
i) is for maintenance purposes undertaken in accordance with a management plan agreed to by the relevant environmental authority; or
ii) occurs behind the development setback line.

Activity Number: 39:Activity Description:

The expansion of:

- i) canals;
- ii) channels;
- iii) bridges;
- iv) weirs;
- v) bulk storm water outlet structures;
- v) marinas;

within a watercourse or within 32 meters of a watercourse, measured from the edge of a watercourse, where such expansion will result in an increased development footprint, excluding where such expansion will occur behind the development setback line.

Government Notice No. R545 of 18 June 2010**Activity Number: 15:**Activity Description:

Physical alteration of undeveloped, vacant, or derelict land for residential, retail, commercial, recreational, industrial, or institutional use where the total area to be transformed is 20 hectares or more.

Except where such physical alteration takes place for:

- i) linear development activities; or
- ii) agriculture or afforestation where activity 16 in this Schedule will apply

Government Notice No. R546 of 18 June 2010

Activity Number: 4:

Activity Description:

The construction of a road wider than 4 meters with a reserve less than 13.5 meters:

(d) In Western Cape

i) in an estuary;

ii) all areas outside urban areas;

iii) in urban areas;

aa) Areas zoned for use as public open space within urban areas; and

bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for a conservation purpose

Activity 6:

Activity Description:

The construction of resorts, lodges or other tourism accommodation facilities that sleep 15 people or more.

d) In Western Cape

i. In an estuary;

ii. All areas outside urban areas;

iii. In urban areas:

aa) Areas seaward of the development setback line or within 1 kilometre from the high-water mark of the sea if no such development setback line is determined;

bb) Areas on the watercourse side of the development setback line or within 100 metres from the edge of a watercourse where no such setback line has been determined.

Activity Number: 12:

Activity Description:

The clearance of an area of 300 square meters or more of vegetation, where 75% or more of the vegetative cover constitutes indigenous vegetation:

a) within any critically endangered or endangered ecosystem listed in terms of Section 52 of the NEMBA, or prior to the publication of such a list, within an area identified as critically endangered in the National Spatial Biodiversity Assessment 2004;

b) within critical biodiversity areas identified in bioregional plans;

c) within the littoral active zone or 100 meters inland from the high-water mark of the sea or an estuary, whichever distance is the greater, excluding where such removal will occur behind the development setback line even in urban areas.

Activity Number: 13:Activity Description:

The clearance of an area of 1 hectare or more of vegetation, where 75% or more of the vegetative cover constitutes indigenous vegetation, except where such removal of vegetation is required for:

- 1) the undertaking of a process or activity included in the list of waste management activities published in terms of Section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), in which case the activity is regarded to be excluded from this list;
- 2) the undertaking of a linear activity falling below the thresholds mentioned in Listing Notice 1 in terms of GN No. 544 of 2010.

c) In Western Cape

i. in an estuary

ii. outside urban areas, the following:

aa) A protected area identified in terms of NEMPAA, excluding conservancies;

bb) National Protected Area Expansion Strategy Focus areas;

cc) Sensitive area as identified in an environmental management framework as contemplated in Chapter 5 of the Act and as adopted by the competent authority;

dd) Sites or areas identified in terms of an International Convention;

ee) Core area in biosphere reserves;

ff) Areas within 10 kilometres from national parks or world heritage sites or 5 kilometres from any other protected area identified in terms of NEMPAA or from the core area of a biosphere reserve;

gg) Areas seawards of the development setback line or within 1 kilometre from the high-water mark of the sea if no such development setback line is determined.

ii. In urban areas, the following:

aa) Areas zoned for use as public open space;

bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority or zoned for a conservation purpose;

cc) Areas seawards of the development setback line;

dd) Areas on the watercourse side of the development setback line or within 100 metres from the edge of a watercourse where no such setback line has been determined.

Activity Number: 14:Activity Description:

The clearance of an area of 5 hectares or more of vegetation, where 75% or more of the vegetative cover constitutes indigenous vegetation, except where such removal of vegetation is required for:

- 1) purposes of agriculture or afforestation inside areas identified in spatial instruments adopted by the competent authority for agriculture or afforestation purposes;
- 2) the undertaking of a process or activity included in the list of waste management activities published in terms of Section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the activity is regarded to be excluded from this list;

3) the undertaking of a linear activity falling below the thresholds in Notice No. 544 of 2010.

a) In Western Cape:

i. All area outside urban areas

Activity Number: 19:

Activity Description:

The widening of a road by more than 4 meters, or the lengthening of a road by more than 1 kilometre.

d) In the Western Cape:

i. In an estuary;

ii. In areas outside urban areas;

iii. In urban areas

aa) Areas zoned for use as public open space within urban areas;

bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for conservation purposes within urban areas.

REGULATION 34 EXTERNAL AUDIT REQUIREMENTS

This section will attempt to detail the content requirements to be included as part of a Regulation 34 Audit Report as outlined in terms of Appendix 7 of Regulation 982 of the 2014 EIA Regulations.

Environmental audit report

The environmental audit report must provide recommendations regarding the need to amend the EMPr, and where applicable, the closure plan.

Objective of the environmental audit report

The objective of the environmental audit report is to

- a) report on –
 - i. the level of compliance with the conditions of the environmental authorisation and the EMPr, and where applicable, the closure plan; and
 - ii. the extent to which the avoidance, management and mitigation measure provided for in the EMPr, and where applicable, the closure plan achieve the objectives and outcomes of the EMPr, and closure plan;
- b) identify and assess any new impacts and risks as a result of undertaking the activity;
- c) evaluate the effectiveness of the EMPr, and where applicable, the closure plan; and
- d) identify shortcomings in the EMPr, and where applicable the closure plan, and
- e) identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr, and where applicable, the closure plan.

Content of environmental audit reports

(1) An environmental audit report prepared in terms of these Regulations must contain –

- a) details of the –
 - i. independent person who prepared the environmental audit report; and
 - ii. expertise of the independent person that compiled the environmental audit report;
- b) a declaration that the independent auditor is independent in a for as may be specified by the competent authority;
- c) an indication of the scope of, and purpose for which, the environmental audit report was prepared;
- d) a description of the methodology adopted in preparing the environmental audit report;
- e) an indication of the ability of the EMPr, and where applicable, the closure plan to –
 - i. sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis;
 - ii. sufficiently provide for the avoidance, management and mitigation of environmental

- impacts associated with the closure of the facility; and
- iii. ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan;
- f) a description of any assumptions made, and any uncertainties or gaps in knowledge;
- g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report;
- h) a summary and copies of any comments that were received during any consultation process; and
- i) any other information requested by the competent authority.

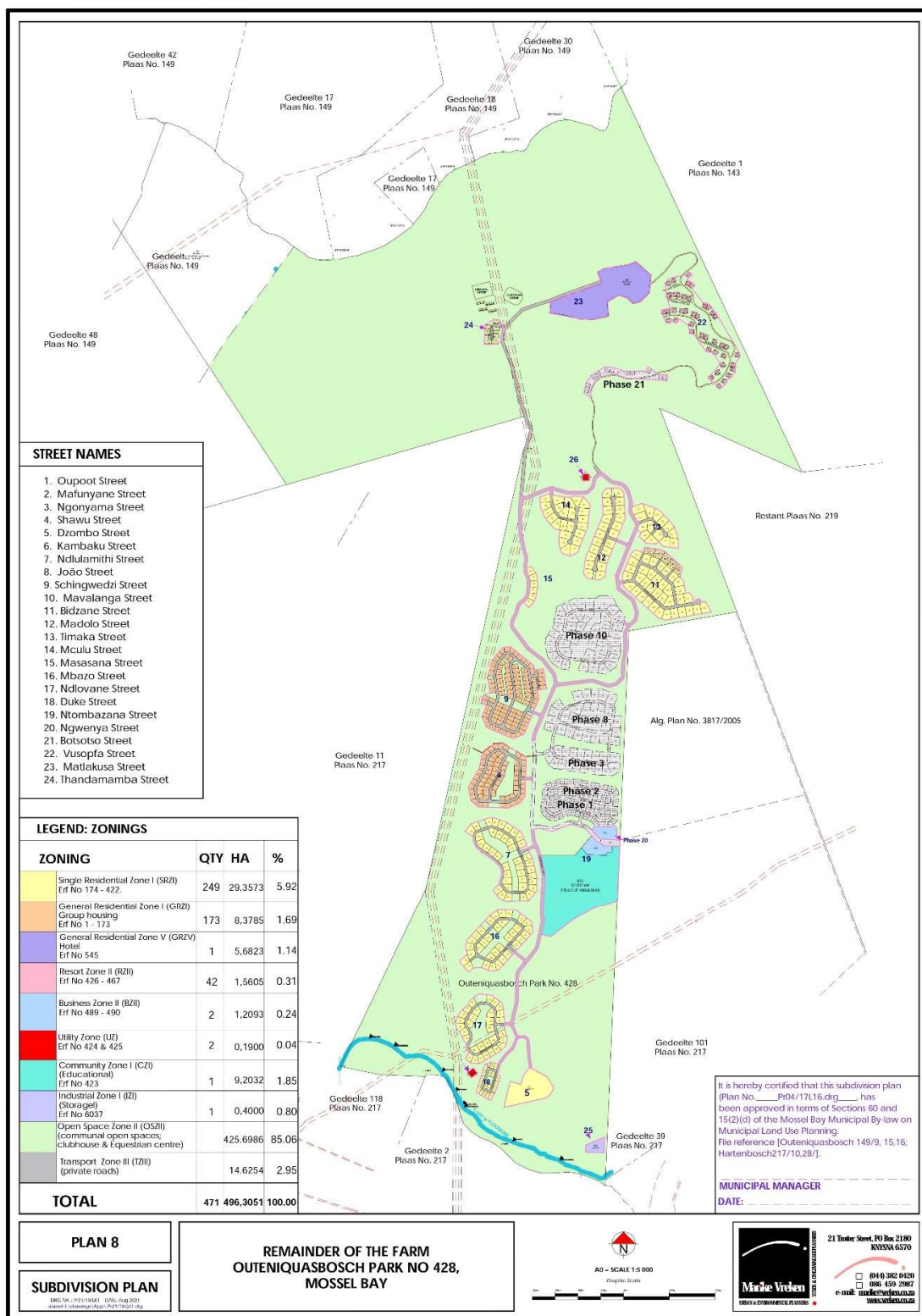


FIGURE 1: APPROVED AMENDED SITE DEVELOPMENT PLAN

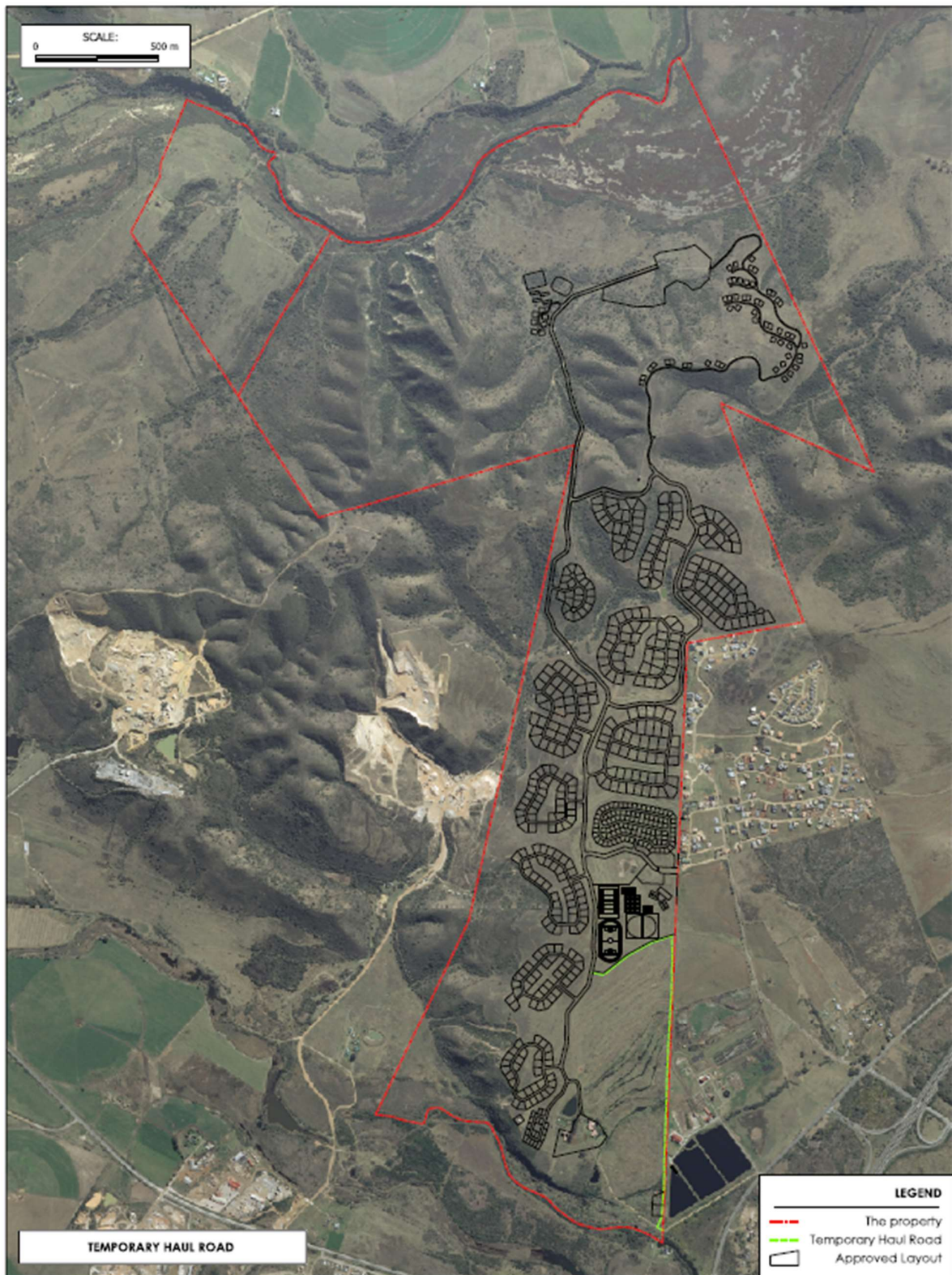


FIGURE 2: SITE DEVELOPMENT PLAN AERIAL OVERLAY

CONDITIONS OF AUTHORISATION

TABLE 2: INITIAL ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
1.	This environmental authorisation is valid for a period of five years from the date of issue. The holder must commence with all the listed activities within this period, or the authorisation lapses, and a new application for environmental authorisation must be submitted to the competent authority, unless the holder has lodged a valid application for the amendment of the validity period of this environmental authorization. In such instances, the validity period will be automatically extended ("the period of administrative extension") from the day before the authorisation would have lapsed, until the amendment application for the extension of the validity period is decided. The listed activities, including site preparation, may not commence during this period of administrative extension.	A letter to notify the department of the intended commencement of activities was submitted to the Department on the 19 th of October 2018.
2.	The listed activities, including site preparation, may not commence within 20 (twenty) calendar days of the date of issue of this environmental authorisation. In the event that an appeal notice and subsequent appeal are lodged with the competent authority, the effect of this environmental authorisation may be suspended until the such time as the appeal is decided.	An amended Environmental Authorisation (EA) was granted to Mr Dreyer van Zyl on the 24 th of November 2014. Groundwork preparation and setting out of the first phase roads took place in November 2018.
3.	The applicant must, in writing, within 12 (twelve) calendar days of the date of this decision and in accordance with Regulation 10(2): 3.1 Notify all registered interested and affected parties of- 3.1.1 The outcome of the application; 3.1.2 The reasons for the decision, as included in Annexure 1; 3.1.3 The date of the decision; and	I&AP Notification letters were sent to all registered I&APs within the required 12 days for each of the 3 decisions issued by the Department.

	3.1.4 The date of issue of the decision. 3.2 Draw the attention of all registered interested and affected parties to the fact that an appeal may be lodged against the decision in terms of Chapter 7 of the Environmental Impact Assessment Regulations, 2010, as detailed in Section F below. 3.3 Draw the attention of all registered interested and affected parties to the manner in which they may access the decision.	
4.	The holder of the environmental authorisation must give the competent authority written notice of the commencement of construction activities and provide proof of compliance with the specified conditions of authorisation. With regard to notices, the holder must- 4.1 Within thirty (30) calendar days of the date of issue of this decision, give notice, with proof of compliance with conditions 2 and 3 above. 4.2 Give seven (7) calendar days' notice before commencement of construction activities. This notice must include proof of compliance with conditions described herein: Condition 6, 11, and 15	A letter of commencement was submitted to the Competent Authority on the 19th of October 2018 indicating that construction will commence on the 12th of November 2018. Proof of compliance: Condition 6: The revised and approved layout plan was submitted to the competent authority on the 28th of February 2018, 9 months prior to the communicated commencement date. Condition 11: EMPr amended to include the requirements of the EA issued 23rd September 2022 and submitted to DEADP for approval prior to commencement. This report includes all the required amendments and is submitted on the 5th December 2022. Condition 15: HilLand Environmental was appointed as the ECO for the duration of the vegetation clearance and stabilisation for the cultivation
5.	This environmental authorisation is only for the approved alternative described in Section B above and excludes development north of erven 162-168, the clubhouse, and the northern boundary of the	Noted. The description in Section B was appealed and subsequently again amended in line with the revised and approved layout plan as shown in Figure 1 and attached as

	neighboring Monte Christo development, as indicated in the layout plan dated June 2011 (DRG NR: PR04/17/L13). No development may take place in the northern section of the property aside from the proposed equestrian centre, the hotel and conference centre, and the resort units as described above.	Appendix B.
6.	The applicant must amend the layout plan in accordance with the description of the development approved by the Department under Section B of this environmental authorisation. This must be submitted to the Department and approved at least 3 weeks prior to the commencement of construction activities.	Noted. The description in Section B was appealed and subsequently again amended in line with the revised and approved layout plan as shown in Figure 1 and attached as Appendix B. The revised and approved layout plan was submitted to the competent authority on the 28 th of February 2018, 9 months prior to the communicated commencement date.
7.	The applicant must furnish this Department with a revised Game Management Plan, which prevents access of wild animals/game to the residential portion of the development. Game-proof fencing must be erected by the applicant to ensure that residents and properties are protected from wild animals. The aforementioned revised Game Management Plan must be submitted to the Department and approved at least 3 weeks prior to the commencement of construction activities.	The revised Game Management Plan was supplied to the Department on 16 March 2018. Note all Buffalo have been removed from the game farm due to the potential risk to residents.
8.	The holder is responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agents, sub-contractors, employeeese, or any person rendering a service to the holder.	Noted and this applies to the future owners and the HOA and any agent, employee, contractor etc rendering a service within the development.
9.	Any changes to, or deviations from the scope of the description set out in Section B above must be accepted or approved in writing, by the competent authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the competent authority may request	Noted. The description in Section B was appealed and subsequently again amended in line with the revised and approved layout plan as shown in Figure 1 and attached as Appendix B.

	such information as it deems necessary to evaluate the significance and impacts of such changes or deviations and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.	
10.	The applicant must notify the competent authority in writing, within 24 hours thereof if any condition stipulated herein is not being complied with.	Noted. All conditions have been and are being complied with as per the findings in this table.
11.	The holder must appoint a suitably experienced Environmental Control Officer (ECO) for the construction phase before commencement of any land clearing or construction activities to ensure compliance with the Environmental Management Programme (EMP) and the conditions contained herein.	HillLand Environmental was appointed as ECO on the site and submitted monthly reports to DEA&DP.
12.	All mitigation measures recommended by the Visual Mitigation Report and the Visual Impact Assessment that formed part of the Scoping Report dated March 2010 (Appendix C) must be strictly implemented.	Visual Mitigations have been included in the Architectural Guidelines for all owners to abide by.
14.	The applicable requirements with respect to relevant legislation pertaining to occupational health and safety must be adhered to.	OHSA - is included in all contract documents for construction.
15.	The draft Environmental Management Programme (EMP) submitted as part of the application for environmental authorisation must be amended to include the following: 15.1 Incorporate all the conditions given in this Environmental Authorisation; 15.2 Be included in all contract documentation for all phases of the development; 15.3 Describe the level and type of competency required of the Environmental Control Officer (ECO), or Environmental Site Agent where applicable;	The final EMP _r has been amended in line with scope of the amendment application as well as to include all the required information contained in the conditions of the EA. The final amended EMP _r is dated May 2022 and is herewith attached as Appendix F.

	15.4 Incorporate an agreement with a recycling company for the collection of recycled waste during the operational phase of the development; 15.5 Determine the frequency of site visits; 15.6 Meet the requirements outlined in Section 24N(2) & (3) of the National Environmental Management Act, 1998 (Act No. 107 of 1998, as amended) (NEMA) and Regulation 34 of the Environmental Impact Assessment Regulations, 2006; 15.7 Provide for the utilization of local labour as far as possible. This may include record-keeping and reporting procedures for monitoring purposes and; 15.8 Must incorporate the revised Game Management Plan. An application for amendment to the EMP must be submitted to the competent authority if any further amendments are to be made to the EMP, other than those mentioned above, and this may only be implemented once the amended EMP has been authorised by the competent authority. The EMP must be included in all contract documentation for all phases of implementation.	
16.	A copy of the environmental authorisation and the EMP must be kept at the site where the listed activities will be undertaken. Access to the site referred to in Section C above must be granted, and the environmental authorisation and EMP must be produced to any authorised official representing the competent authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein. The environmental authorisation and EMP must also be made available for inspection by any employee or agent of the applicant who works or undertakes work at	Access to the site referred to in Section C is available. The Environmental Reports and EMPs are accessible to the Competent Authority.

	the site.	
17.	The applicant must submit an application for an amendment of the environmental authorisation to the competent authority where any detail with respect to the environmental authorisation must be amended, added, substituted, corrected, removed, or updated. Further, the rights granted by this environmental authorisation are personal rights (i.e., not attached to a property, but granted to a natural or juristic person). As such, only the holder may undertake the activities authorised by the competent authority. Permission to transfer the rights and obligations contained herein must be applied for in the following manner: 17.1 The applicant must submit an originally signed and dated application for amendment of the environmental authorisation to the competent authority stating that he-she wishes the rights and obligations contained herein to be transferred, including: (a) Confirmation that the environmental authorisation is still in force (i.e., that the validity period has not yet expired or the activity/activities was/were lawfully commenced with); (b) The contact details of the person who will be the new holder; (c) The reasons for the transfer; (d) An originally signed letter from the proposed new holder acknowledging the rights and obligations contained in the environmental authorisation and indicating that he/she has the ability to implement the mitigation and management measures and to comply with the stipulated conditions. 17.2 The competent authority will issue an amendment to the new holder, either by way of a new environmental authorisation or an addendum to the existing environmental authorisation, if the transfer is found to be appropriate.	Noted. An application for the amendment of the appeal EA was submitted on the 28th of January 2022 and subsequently granted by the Western Cape Minister of Local Government on the 25th of May 2022 with DEA&DP EIA Ref: 14/3/1/1/D6/18/0574/22. The purpose of the amendment application included the replacing of the activity description, as well as the transfer of the rights and obligations of the Environmental Authorisation from Mr Dreyer van Zyl to Zec4 (Pty) Ltd.

18.	Non-compliance with a condition of this environmental authorisation or EMP may result in the suspension of this environmental authorisation and may render the holder liable for criminal prosecution.	Noted, the contractors and holder of the EA have been complying with conditions of the EA as well as the EMPr sufficiently.
19.	Notwithstanding this environmental authorisation, the holder must comply with any other statutory requirements that may be applicable to the undertaking of the listed activities.	Noted.
20.	An integrated waste management approach, which is based on waste minimisation and incorporates reduction, recycling, re-use, and disposal where appropriate, must be employed. Any solid waste must be disposed of at a landfill licensed in terms of the applicable legislation.	Noted.
21.	No surface or groundwater may be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.	Noted - all storm water passes through the numerous detention swales vegetated with natural vegetation before it continues on into the natural drainage lines and detention ponds included as part of the stormwater management plan for the development.
22.	All associated service infrastructure and bulk services for water, sewage, electricity, and stormwater drainage must be placed within the road reserve of the existing and proposed roads, to minimise the impacts.	The approved service plans indicate that only services not possible to place within the road reserve deviate from this provision.
23.	The applicable requirements with respect to relevant legislation pertaining to cutting, damaging, disturbing, or destroying protected trees or trees from a natural forest must be adhered to.	Noted and procedure for DAFF permits have been included in Section 5.7 of the EMPr.
24.	Should any heritage remains be exposed during excavations or any actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape, in accordance with the applicable legislation. Heritage remains uncovered or disturbed during earthworks must not	No heritage remains have been found on site as of yet.

	be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include: archaeological remains (including fossil bones and fossil shells), coins, indigenous and/or colonial ceramics, any articles of value or antiquity, marine shell heaps, stone artifacts and bone remains, structures and other built features, rock art and rock engravings, shipwrecks, and graves or unmarked human burials. A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.	
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APPEAL ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE

TABLE 3: APPEAL ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
E-1.	This environmental authorisation is valid for a period of five years from the date of this appeal. The holder must commence with all the listed activities within the said period, or this environmental authorisation lapses, and a new application for environmental authorisation must be submitted to the competent authority, unless the holder has lodged a valid application for the amendment of the validity period of this environmental authorization (i.e. the amendment application must be submitted to the Ministry responsible for environmental affairs in the Western Cape Province), before the expiry of this environmental authorization. In such instances, the validity period will be automatically extended ("the period of administrative extension") from the day before this environmental authorisation would otherwise have lapsed, until the amendment application for the extension of the validity period is decided. The	This amended Environmental Authorisation (EA) was granted to Mr Dreyer van Zyl on the 24th of November 2014. A letter to notify the department of the intended commencement of activities was submitted to the Department on the 19th of October 2018 and groundwork preparation for the first phase roads took place in November 2018.

	listed activities, including site preparation, may not commence during this period of administrative extension.	
E-6.	The applicant must amend the layout plan in accordance with the description of the development approved by the competent authority under Section B of the appeal environmental authorisation. This must be submitted to the competent authority and approved at least 3 weeks prior to the commencement of construction activities.	The revised and approved layout plan was submitted to the competent authority on the 28 th of February 2018, 9 months prior to the communicated commencement date.
E-7.	The applicant must further furnish the competent authority with a revised Game Management Plan, which prevents access of wild animals/game to the residential portion of the development. Game-proof fencing must be erected by the applicant to ensure that residents and properties are protected from wild animals. The aforementioned revised Game Management Plan must be submitted to the Department and approved at least 3 weeks prior to the commencement of construction activities.	The revised Game Management Plan were supplied to the Department on 16 March 2018. Note all Buffalo have been removed from the game farm due to the potential risk to residents.
E-17	The applicant must submit an application for an amendment of the environmental authorisation to the competent authority where any detail with respect to the environmental authorisation must be amended, added, substituted, corrected, removed, or updated. Save that such application for amendment shall not include the personal details of the holder of the environmental authorization (Where any of the applicant's contact details change, the physical or postal address and/or telephonic details, the applicant must notify the Ministry in writing as soon as the new details become known to the applicant). Further, the rights granted by this environmental authorisation are personal rights (i.e., not attached to a property, but granted to a natural or juristic person). As such, only the holder may undertake the activities authorised by the competent authority. Permission to transfer the rights and obligations contained herein must be applied for in the following manner:	An application for the amendment of the appeal EA was submitted on the 28th of January 2022 and subsequently granted by the Western Cape Minister of Local Government on the 25th of May 2022 with DEA&DP EIA Ref: 14/3/1/1/D6/18/0574/22. The purpose of the amendment application included the replacing of the activity description, as well as the transfer of the rights and obligations of the Environmental Authorisation from Mr Dreyer van Zyl to Zec4 (Pty) Ltd.

	17.1 The applicant must submit an originally signed and dated application for amendment of the environmental authorisation to the competent authority stating that he/she wishes the rights and obligations contained herein to be transferred, including: (a) Confirmation that the environmental authorisation is still in force (i.e., that the validity period has not yet expired or the activity/activities was/were lawfully commenced with); (b) The contact details of the person who will be the new holder; (c) The reasons for the transfer; (d) An originally signed letter from the proposed new holder acknowledging the rights and obligations contained in the environmental authorisation and indicating that he/she has the ability to implement the mitigation and management measures and to comply with the stipulated conditions. 17.2 The competent authority will issue an amendment to the new holder, either by way of a new environmental authorisation or an addendum to the existing environmental authorisation, if the transfer is found to be appropriate.	
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AMENDMENT OF APPEAL ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE

TABLE 4: AMENDMENT OF APPEAL ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
15.	15.9. The mitigations measures detailed in the recent Traffic Impact Assessment, dated September 2021, by Urban Engineering must be incorporated into the Environmental Management Programme, implemented and complied with.	Refer to Section 5.9 of the Amended EMPr.

SITE AUDIT FINDINGS

A walkthrough site visit was conducted on 30 August 2024, accompanied by the Environmental Control Officer (ECO), Stefan Delport. Several different phases within the estate are currently under and at different levels of completion. The entire estate included bulk stormwater facilities and conservation areas were investigated during the site visit.

Construction activities are currently underway at the school site, located to the left of the entrance included as Phase 19, off Matunyane Street. Phases 1 and 2 (Single Residential Zone I) have been completed, with a few single residential units still under construction as part of Phase 3. Phase 4 (General Residential Zone I - Group Housing) is currently a focal point of the construction activities underway which includes cement batching, foundation laying, structural framing, brickwork, and the installation of basic services such as plumbing and electrical.

Adjacent to Phase 4, Phase 9 (General Residential Zone I - Group Housing) is currently undergoing bulk civil works, including the installation of bulk sewers, bulk water and internal road networks. Greywater systems are also installed as part of the service systems, along with paving stones for the roads and walkways. Phase 10 (Single Residential Zone I) immediately north is nearly completed, with only one or two houses currently under construction.

Phases 14, 12, and 11 (Single Residential Zone I) have also commenced with the construction of residences where bulk civil works have been completed. Sub-contractors are currently on site for the construction of these larger residential properties. The majority of detention swales and stormwater detention ponds have been established, and they are in good condition. The detention swales serve as key components of the stormwater infrastructure, designed to slow water runoff and promote natural infiltration into the environment. These swales have been planted with locally occurring species, enhancing the rehabilitation phase and supporting wetland restoration efforts.

In Phase 9, a designated cement batching pond was noted, which is lined with impermeable black builders sheeting to manage cement runoff and ensure containment. One additional batching area was also noted in phase 9 where cement water runoff was noted (*please refer to the photo pages herewith attached as Appendix A*). These ponds are located on sectioned erven that will eventually be paved, which makes their current use acceptable within the context of ongoing construction. Minor amounts of waste were observed scattered around the site, though overall waste management appears adequate.

The construction sites are screened with green netting in accordance with the Environmental Management Plan (EMP), ensuring each residential unit and the school construction area is properly enclosed. Skips for both organic and non-organic waste are in place, and sanitary facilities are available at all construction sites. These facilities are well-maintained, secure, and hygienic.

Stormwater infrastructure seems to be functioning as intended and no areas of erosion was noted during the site visit. The stormwater infrastructure, particularly the detention swales, has been placed at strategic points to enhance the growth of indigenous vegetation and support wetland ecosystems. The rehabilitation efforts around completed phases are also progressing and landscaping only comprise of indigenous species. Vegetation has been reintroduced around the residences and open spaces between development nodes, with natural vegetation establishing. Retention walls (terraforce) adjacent to Phase 10 have been planted with indigenous vegetation, including vygies.

The school construction area features large stockpiles of material, including topsoil, which has been windrowed and placed in appropriate locations near the construction zone in the areas to be developed as sporting fields. According to the ECO, stripped subsoil and topsoil material from construction is placed within the designated construction footprint and used for excavation, filling, and immediate rehabilitation where feasible (*please refer to the photo pages herewith attached as Appendix A*).

Contractors' camps are appropriately located near each phase for ease of material access and transport. All camps are fenced off and kept in a neat, orderly condition.

The open spaces between nodes are being rehabilitated to restore the area's natural vegetation, with the introduction of bush clump thicket pockets. These pockets will facilitate the return of native plant species while maintaining wildlife corridors and game management areas. The areas between residences are also preserved to allow the movement of wildlife.

In conclusion, the construction activities investigated as part of the detailed site visit is progressing well and in line with the requirements of the EMPr. No significant non-compliances were noted and the general conditions of the construction activities on site is tidy.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 5: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Environmental Induction All construction personnel must undergo environmental training, covering site-specific requirements and basic environmental ethics (e.g., litter prevention, and fire safety). Records should be kept of training (attendance register and content). Induction required for all civil contractors and for each building contractor prior to them commencing on site.	An environmental induction was given to all staff members before commencement of any construction activities within each phase and for either the installation of civil services or the construction of residences. Refer to Appendix K where induction periods and timelines are presented accordingly.
2.	Demarcation of No-Go Areas	
2.1	All personnel must be informed of no-go areas where work is not permitted. Demarcation of work areas required; no work outside these areas. No-go areas to be visibly demarcated (e.g., danger tape tied in a knot to a rod, rope, fencing, mulch bags, wire fencing, shade netting etc.).	All individual construction boundaries have been appropriately demarcated and screened using green netting. The demarcation along the current construction of the detention pond being constructed beneath Phase 9 and 10 should be reinstated. All external construction activities have included appropriate demarcation as evidenced in the ECO reports.
2.2	The areas of special consideration may relate to the external service lines entering and leaving the property, e.g. the water pipes and stormwater detention swales. All such activities must first be approved by the ECO prior to commencement of activities. Special conditions will be applied to each of these cases.	Stormwater detention swales for phases, 1, 2, 4, 9, 10, 19, 11, 12, and 14 have been successfully constructed directly towards the continued construction of detention ponds. The demarcation along the current construction of the detention pond being constructed beneath Phase 9 and 10 should be reinstated.
2.3	Adjacent properties to the construction site may not be entered by any construction staff if permission is not granted by the owner.	No such incidents have been reported.
3.	Flora and Fauna	
3.1	The animal rescue strategy should be implemented prior to bush	Per the ECO reports provided, all areas prior to excavation and

	clearing, when the site is surveyed.	construction is surveys and any animal species or indigenous plant species are relocated to adjacent open space areas or used in rehabilitation as per the landscaping plan.
3.2	In order to successfully rehabilitate the site, it is necessary to undertake a plant rescue programme which is phased to run ahead of the construction phases. The programme allows for the recovery of plant species from any building area which may be suitable for transplant and replanting in the conservation areas of the site. No indigenous vegetation may be cleared from site without the prior approval of the ECO.	All landscaping guidelines have been followed and rescued plant species have been relocated and replanted in the open space corridors adjacent to the residences and Phases. Proof of search and rescue plants have been included in the ECO reports provided.
3.3	Each construction node is to be screened off with a well secured shade cloth fence around the immediate building footprint. This will retain the work area and prevent game from wandering into the construction areas and injuring themselves during the construction period.	All active construction sites have been adequately screened/fenced off with green shade cloth netting which is still in place and kept in good condition.
4.	Method Statements The ECO will evaluate the method statement and ensure that it covers the handling of the following aspects: • The demarcation of the construction area and the demarcation of the no-go areas around the specific construction phase. • Method of installing services linked to that phase - Services which fall outside the erven or road reserves MAY need to be hand excavated if the area through which they need to pass is sensitive to disturbance. • Programme for trench excavation, installation, backfilling and rehabilitation. • Trenches are to be immediately backfilled and rehabilitated	Method statements were submitted by the contractor to the ECO per the ECO reports.

	utilizing the in-situ topsoil and vegetation which is set to the side of the trench on commencement of excavation. Under NO circumstances may the topsoil be used as bedding for pipes. • Stormwater control for erosion to be utilized in that construction phase. Temporary measures for controlling stormwater and hence erosion could include, berms, soil savers, soil blankets, straw bales, mulch bags, mulch rolls, silt traps, silt fences or any other method approved by the ECO. • Plan for remedy of any erosion control measures which fail to perform - after site inspection; the contractor will have to remedy these at their own cost. • Rehabilitation plan for all areas disturbed during construction - require rehabilitation using plant material local to the site. • Indication of the designated haul roads to be used. These must be approved by the ECO and may be instructed by the site engineer. These require demarcation and fencing off in some form to prevent encroachment into the no-go areas.	
5.	Topsoil Stripping	
5.1	As topsoil is a valuable resource, it must be stripped from all construction areas before work commences. This topsoil should be stockpiled for use in rehabilitation and landscaping and must not be contaminated with other building materials.	Topsoil has been stripped from all construction sites before work commenced and stockpiled and windrowed within the development/construction footprint for the use or rehabilitation. Large topsoil stockpiles were also noted at the school construction site underway.
5.2	The vegetation roots are to be removed together with the top 20cm of topsoil and are to be stockpiled for use during the rehabilitation phase.	Topsoil has been stripped from all construction sites before work commenced and stockpiled and windrowed within the development/construction footprint for the use or rehabilitation.

5.3	This topsoil is to be stockpiled in the designated topsoil stockpile areas, to be agreed on by the ECO.	Topsoil has been stripped from all construction sites before work commenced and stockpiled and windrowed within the development/construction footprint for the use or rehabilitation.
6.	Department Environment Forest and Fisheries (DFFE)	
6.1	In cases where it is absolutely necessary to cut, disturb or destroy Forest/thicket and or Protected Trees, application for a license, which might be issued with conditions, must be made through this office prior to ANY disturbance of the site concerned.	No licence to remove any Protected trees of vegetation have been applied for or have been deemed necessary.
6.2	Trenches for sewage and water pipes, running through forested areas, must be dug manually wherever possible.	Small amounts of trenching were observed during the site audit within Phase 9, none of which traverses within forested areas.
6.3	All steps must be taken to preserve as much as possible indigenous trees, e.g. trees may form an integral part of a development.	Complied with as forested area have been incorporated into the landscaping guidelines and stormwater infrastructure placement.
6.4	The following general comments to be considered: • Compaction of soil may only take place within the footprint of structures in the development. • Earth moving operations must be done taking the weather patterns and peak raining season of this region into account (October November and March April) additional protective measures required during peak periods. • Vegetation downstream must not be affected or destroyed by siltation from or water run-off from the area during the development process etc. • Care should be taken to prevent any contamination of groundwater during the construction phase. • Except for alien invaders, all vegetation in riparian zones and riverbanks must stay intact, no or little disturbance should be allowed in these areas.	Soil compaction has only occurred within the designated development/construction footprints within each phase. The haul roads are continually monitored for dust generation and a water truck is available on site for dust suppression if required. Complied with. No siltation was identified during the site visit, all construction activities have been contained as far possible and cement batching ponds have been created to reduce runoff and spillages. No vegetation within the created detention pond and present wetlands have been removed or disturbed.

7.	Contractors Camp Site	
7.1	The contractors' campsite is to be set up in the area indicated and approved by the ECO for this purpose and must be totally fenced off from the game. The initial contractors' camp site will be within the school site. The contractors' campsite, offices and storage facilities shall not be located within or adjacent to an environmentally sensitive area.	The civils contractors' camps have been set up within each Phase of development for ease of access to materials and distribution around haul roads within areas to be developed. The individual residences site camps are located on the sites and adequately fenced off using shade cloth netting. No site camps are located near any water bodies or indigenous vegetation clumps.
7.2	The civil contractors' campsite is to be the first area where activity will take place on site. This camp must be within an area that is within the construction area.	Complied with, currently a contractor's camp is present within Phase 19, and between Phase 4 and the completed Phases 1, 2, and 3. This provides access to materials for all construction activities, both civil installations in Phase 9 and construction in Phase 4, 10, 12, 14, and 11.
7.3	The camp is to be fenced off and no encroachment beyond the approved site will be permissible.	Contractor's camps have been set up near each Phase of development for ease of access to materials and distribution around haul roads. The site camps are completed and adequately fenced off using shade cloth netting.
7.4	Portable ablution facilities (chemical toilets) are to be provided at the camp site for use of the staff. Additional facilities are to be provided closer to areas of work at all times. These facilities must be removed from site when the construction phase is completed, as well as the associated waste be regularly disposed of at a registered waste site.	Chemical toilets are present within each construction site.
7.5	A fenced off area must be created within the camp site for refuse and waste management as indicated above. ECO to inspect for compliance.	Waste skips and refuse binds were noted within most of the construction sites as well as within the contractors camps during the site visit.
7.6	No accommodation of contractors or their staff with the exception of a night watchman is permitted on site.	No workforce is accommodated on any of the sites.
7.7	In terms of the Atmospheric Pollution Prevention Act, burning is not	No evidence of burning/fires were observed during the site audit.

	permitted as a disposal method for the entire property.	
7.8	Storage of all materials required for the contract must occur within this campsite, or otherwise approved area (by the ECO).	All materials such as paint, ready-mix cement, generator, etc. were stored within lockable containers within the contractor's camps.
7.9	Any concrete batching areas are to be approved by the ECO prior to utilization and must be equipped with suitable settling ponds and trapping mechanisms to ensure that contaminated water does not leave the restricted area.	Complied within. During the site audit conducted it was noted that the cement batching locations were designated by the ECO. The batching location within phase 9 included a lined settling pond. An additional batching area was also noted with cement water runoff from the area although contained within the construction footprint.
7.10	Any temporary diesel storage tanks are to be secured with adequate bunding to cater for spillage and leakage.	No fuel browsers or storage tanks were observed during the audit.
7.11	Adequate signage must be erected at the main entrance to the construction site to ensure that safety regulations are adhered to.	Complied with. At the bulk civils works and the contractors camps safety information signage was displayed.
7.12	There should be a secure access point to the construction site in order to ensure that no unauthorized entry is permitted which may lead to a safety or security risk. Any temporary haul roads or access roads for construction need to be maintained at all times by the contractor.	All temporary haul roads out of use have been rehabilitated, such as those within Phase 1 and 2. The school site is serviced with a haul road and the main entrance road and access to the site is taken from both. All other construction sites are access from one point.
8.	Ablution Facilities	
8.1	Contractors must provide ablution facilities for all construction personnel working on the site. One facility for every 15 persons on site is required.	Sufficient number of chemical toilets have been provided by the respective contractors within each construction area,
8.2	Toilets shall be of a neat construction and shall be provided with doors and locks and shall be secured to prevent them blowing over.	Chemical toilets are in good clean condition and serviced at dedicated intervals.
8.3	Sanitation provision and servicing shall be to the satisfaction of the environmental control officer. The contractor shall ensure that the toilet(s) are emptied regularly and also before weekends and public holiday periods.	Chemical toilets are in good clean condition and serviced at dedicated intervals.

9.	Fuel Storage	
9.1	Temporary fuel storage must take place within the contractor's campsite.	No fuel bowzers or storage tanks were observed during the audit.
9.2	Storage facilities should not be located within 55m of a watercourse, within a watercourse flood plain, near a wetland area or where there is a potential for any spilled fuel to enter a watercourse or groundwater.	Storage containers are placed within the contractor's camp which have been placed outside any riparian/flood zones.
9.3	Fuel storage facilities should be located on flat ground and be in a bunded area.	No fuel bowzers or storage tanks were observed during the audit.
9.4	Bundwalls must be constructed to contain at least 110% of the total capacity of the storage tanks. Bundwalls must be constructed of impermeable material or lined to ensure that petroleum products cannot escape. A suitable material should be placed in the base of the bundwalls to soak up any accidental spillages.	No fuel bowzers or storage tanks were observed during the audit.
9.5	The tanks should be locked and secured when not in use.	No fuel bowzers or storage tanks were observed during the audit.
9.6	Automatic shut-off nozzles are required on all dispensing units.	No fuel bowzers or storage tanks were observed during the audit.
9.7	Storage tanks should be drained within one week of completion of activities (unused fuel can be used by the contractor on other work sites or returned to the supplier).	No fuel bowzers or storage tanks were observed during the audit.
9.8	All storage tanks, containers and related equipment should be regularly maintained to ensure the safe storage and dispensing of fuel.	No fuel bowzers or storage tanks were observed during the audit.
9.9	Defective hoses, valves and containment structures should be promptly repaired.	No fuel bowzers or storage tanks were observed during the audit.
9.10	Vehicle and equipment fuelling should be undertaken on a hard surface or over drip pans to ensure spilled fuel is captured and cleaned up.	No fuel bowzers or storage tanks were observed during the audit. A generator was present without the required drip tray but was placed on the prepared internal road structure of Phase 9.

11.	Stormwater Management	
11.1	The use of erosion control mechanisms such as erosion berms, silt fences, rows of onion bags, mulch, brushwood and deflection bars (the choice depending on the situation), is essential in all exposed areas and where slopes are steep, as runoff can cause erosion. These erosion control mechanisms should additionally separate the area of earthworks from the surroundings.	During the site visit conducted, no erosion areas were noted. The stormwater infrastructure across the site has been completed at along all the residential phases completed. At the time of audit construction of stormwater detention dams were underway along the western boundary of the site below phase 4 and 9.
11.2	Erosion control mechanisms must be in place during each stage of the construction phase. To decrease the risk of water pollution, all construction materials must be secured (e.g. only stockpiling at a predetermined site, around which there must be a boundary) so that there is no wash away or chance of them entering any water courses.	The stormwater drainage areas have been completed along most of the areas under construction. No excavated materials nor stockpiling is currently done within locations prone to stormwater flows. The stockpiling at the school site is done on old agricultural lands where rainwater soaks away.
11.3	Stormwater control measures must ensure minimization of erosion risk. Stormwater outlets will need to have dissipaters to slow the outflow and trap silt during construction.	Complied with, stormwater infrastructure has been adequately and optimally placed along the side with gabion mattresses in place to break the flow of large amounts of water coming from the further phases of the development. Smaller stormwater culverts and flow paths have also effectively redirected water flow along with the detention swales. No erosion was observed during the site audit.
11.4	The development should be phased so that the area of exposed ground is limited at any single point in time. It is the responsibility of the contractor digging a trench to ensure that the erosion control measures are in place throughout the period of risk (i.e. until backfilled and stabilised).	Phases have been constructed within appropriate timelines to reduce the amount of bare surface and exposure to natural conditions.
11.5	Where water is directed out of a trench by the contractor, they are responsible for the prevention of erosion at the discharge point and of preventing the movement of any silt beyond the work area (which may be carried in such water, or result from the erosion caused by	No erosion or siltation was observed during the site audit.

	such water).	
11.6	In the event of erosion damage or silt movement, the contractor is responsible for the clean-up required to reinstate the conditions to normal.	No erosion or siltation was observed during the site audit.
11.7	The area of open trench at any time should be limited.	Complied with, the only open trenched currently visible is that within Phase 19 and Phase 9 during the installation of civil services, one pipeline at a time.
12.	Fire Management	
12.1	No fires are permitted during the construction phase by the contractor for any reason what so ever due to the risk of an uncontrolled wild fire and the game on the property.	No fires or evidence of fires were observed during the site audit.
12.2	The fire breaks are to maintained along the property boundaries and the internal irrigation system is in place for fire management as the rehabilitation of Grootbrak Dune strandveld thicket between the residential clusters is not a fire driven ecosystem and as such fire needs to be excluded from this area.	Large open space corridors and fire break corridors are in place along the boundary of the site and between Phases/residential nodes. Indigenous vegetation is also being replanted during rehabilitation and landscaping to ensure adequate fire management.
12.3	No open fires or naked flames for heating or cooking shall be allowed on site. Stoves and other electrical equipment shall only be permitted in the Contractor's camp and never be left unattended.	No fires or evidence of fires were observed during the site audit.
12.4	Cigarettes may not be disposed of in the veld and must be disposed of properly. The Contractor should have fire-fighting equipment on site and ensure that all personnel are taught how to use it.	Fire-fighting equipment is present onsite within the storage containers. No evidence of cigarette buds that have been discarded within the surrounding environment were observed.
12.5	No burning of waste on ANY PART of the Estate is permitted.	During the site audit waste skips were in place and no evidence of burnt waste was observed.
13.	Landscaping	
13.1	General landscaping guidelines as stipulated in Annexure 10 are to be followed to ensure that only indigenous and water wise vegetation is planted. This together with a garden designed in such	Complied with. Landscaping and rehabilitation are continuously underway. Gardens and open space areas are only planted with indigenous vegetation and grey water systems are in use.

	a way as to use water sparingly will be required. The irrigation water provided by the estate is to be used for rehabilitation and landscaping and potable water should not be used for this purpose.	
13.2	In order to limit the visual and noise impact from the adjacent quarry a windbreak barrier will be planted along the western boundary and will be registered in terms of NEMBA.	Not yet relevant and to be completed.
14.	Waste Management	
14.1	Disposal of waste during construction is the responsibility of the contractor and must only be removed to a licensed landfill site. A fenced off area must be created within the construction camp site for refuse and waste management. Refuse is to be collected in two separate containers, one for recyclable materials (i.e. glass, metal, paper and plastic) and the other for non-recyclable materials. These are to be disposed of at the various approved waste disposal sites.	Waste skips are present within each construction site/area along with waste bins placed within nodes of construction. Please refer to the photo pages for proofs.
14.2	During the operational phase refuse must be in scavenger and weather proof bins and be moved to the designated collection point for the municipal removal in accordance with the rules set in place by Outeniquasbosch or the municipality.	Not yet relevant.
15.	Rehabilitation	
15.1	The rehabilitation of disturbed areas will require the following treatment: • Removal of all in situ contaminated material (cement, concrete, bricks etc.) • Replacing the topsoil from stockpile area (at least 20 cm depth) • Seeding with a stabilizing seed mix, which will rapidly bind the soil. • Replanting plants from the plant rescue nursery.	All rehabilitation efforts have been successful, please refer to Appendix K for the ECO reports which refers to rehabilitation that has occurred within each Phase.

	Removal of the shad cloth screen around the disturbed area only after the vegetation has re-established.	
15.2	The rehabilitation and re-establishment of disturbed areas is critical to the success of this development. These disturbances could be in the form of areas exposed and destabilized during construction. Rehabilitation must occur concurrently with the phased construction progress to ensure that no areas are left exposed.	All rehabilitation efforts have been successful, please refer to Appendix K for the ECO reports which refers to rehabilitation that has occurred within each Phase.
15.3	Various methods of rehabilitation are available, however, this site requires the use of indigenous plant species which will be tolerant of the conditions on site. All plant rescue plants will be stored in an on-site nursery for use in the rehabilitation phase.	All rehabilitation efforts have been successful, please refer to Appendix K for the ECO reports which refers to rehabilitation that has occurred within each Phase.
15.4	All topsoil must be stockpiled (top 20-30cm) from any construction area for use in the rehabilitation.	All rehabilitation efforts have been successful, please refer to Appendix K for the ECO reports which refers to rehabilitation that has occurred within each Phase.
15.5	The initial phase of the revegetation and landscaping rehabilitation programme will consist of establishing a rapid ground covering on the exposed slopes such as road verges, pipeline routes and other disturbed areas. Once this initial covering is established, plants which have been rescued can be replanted within key areas.	All rehabilitation efforts have been successful, please refer to Appendix K for the ECO reports which refers to rehabilitation that has occurred within each Phase.
15.6	Seed should be collected from the surrounding natural vegetation to assist with rehabilitation.	All rehabilitation efforts have been successful, please refer to Appendix K for the ECO reports which refers to rehabilitation that has occurred within each Phase.
16.	Road Verges - Road construction should limit the disturbed area to the minimum within the road reserve. - Trimming of banks to a suitable grade for vegetation. - Topsoil from the site stockpile is required on all exposed surfaces.	Complied with. All banks have been cut and filled to a suitable elevation for vegetation and no extremely steep slopes occur within the individual construction areas. Topsoil has been used for the rehabilitation of road reserves and verges as confirmed by the ECO during the site visit conducted. It was also noted that topsoil

	• Stabilizing seed mix of indigenous grasses on all large exposed slopes. • Mulch and brushwood should be used to retain moisture on cuttings until germination and seedling establishment have taken place. • A geofabric and brushwood may be required on steep slopes. • Watering will improve the success rate of the rehabilitation during dry periods.	was windrowed and and/or spread along the completed internal roads as per the photo pages in Appendix A. Rehabilitation of these areas outside the construction footprints have been completed.
17.	Storm Water Detention Swales The outlet of every stormwater pipe will discharge into a detention swale with the intention to create a wetland area where water can stand and then slowly dissipate into the natural environment. These swales will be vegetated with locally occurring species and will form the basis of the rehabilitation phase of the thicket clusters through the planting of the locally occurring species around the swales to make use of the additional water available for plant growth. The detention swales will be planted with species that can tolerate inundation with water and the irrigation water system can be used to supplement the restoration of these areas during periods of low rainfall.	Most detention swales and stormwater detention ponds have been established, and they are in good condition. The detention swales serve as key components of the stormwater infrastructure, designed to slow water runoff and promote natural infiltration into the environment. These swales have been planted with locally occurring species, enhancing the rehabilitation phase and supporting wetland restoration efforts. Stormwater infrastructure is functioning well, and the rehabilitation efforts around completed phases are progressing smoothly. Vegetation has been reintroduced around the residences and open spaces between development nodes, with natural vegetation thriving due to well-executed rehabilitation. Retention walls adjacent to Phase 10 have been planted with indigenous vegetation, including vygies, which help blend the built environment with the surrounding natural landscape, aligning with the development's country living concept.

		The stormwater infrastructure, particularly the detention swales, has been placed at strategic points to enhance the growth of indigenous vegetation and support wetland ecosystems. This infrastructure is instrumental in managing runoff and ensuring the retention of natural wetland pockets and forested areas between phases.
18.	Open Space Areas Between Nodes The rehabilitation of the areas between nodes will be done in a manner to recreate the naturally occurring vegetation of the area. This will be undertaken by planting bush clump thicket pockets that will bring the natural vegetation back between the development nodes while not detracting from the game management and wildlife corridors. These areas in addition to the zones between homes are all retained for the purpose of allowing continual movement of game.	The open spaces between nodes are being rehabilitated to restore the area's natural vegetation, with the introduction of bush clump thicket pockets. These pockets will facilitate the return of native plant species while maintaining wildlife corridors and game management areas. The areas between residences are also preserved to allow the movement of wildlife, contributing to the overall ecological balance of the development.
19.	Noise The owner/manager and his contractor(s) must comply with the regulations pertaining to noise (SANS 10400 is applicable) and take the neighbours into account when working on site. Contractor and staff are only permitted to work Mondays to Fridays (08:00 17:00). No work on public holidays or weekends permitted to avoid disturbance to local residents.	All construction has occurred within the designated and allowable working hours. No noise reports have been reported/issued.

CONCLUSION

Based on the information obtained and site visit conducted on the 30th of August 2024, the applicant has sufficiently complied with the conditions of the Environmental Authorisation and EMP. Furthermore, the EMP is considered adequate and effective to manage and mitigate the activities.

No specific contradictions between the EA and EMP were noted.

This external audit report did not identify any significant non-compliance with the conditions of the Environmental Authorisation.

The outcome of this audit has not found insufficient mitigation of environmental impacts associated with the undertaking of the listed activities, nor has it found insufficient levels of compliance with the Environmental Authorisation. As such a public participation process in terms of Regulation 34(5) will not be undertaken.

In compliance with regulation 34(6) the holder of the EA must within 7 days of the date of submission of an environmental audit report to the competent authority, notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available –

- (a) to anyone on request; and
- (b) on a publicly accessible website, where the holder has such a website.

Compiled by:

A handwritten signature in black ink, appearing to be 'Renier Kapp', written over a light blue grid background.

Renier Kapp
for KAPPEC

ANNEXURE A – SITE PHOTOGRAPHS

Entrance to The Site



Entrance to the Outeniqubosch LifeStyle Estate adjacent Phase 19.



Entrance to the Outeniqubosch LifeStyle Estate

Phase 19 (Construction of the School)



The entrance to the Business Zone II as seen from the Estate entrance.



Construction of the Business zone and the school site underway as seen from the entrance to the estate.



Stockpiles within the development footprint of the new School.



Condition of construction within Phase 19 appropriately screened/fenced off with shade netting.



Condition of construction within Phase 19 appropriately screened/fenced off with shade netting.



Condition of construction within Phase 19 appropriately screened/fenced off with shade netting.



Excavation for the building of the School off Matunyane Street.



Excavation for the building of the School off Matunyane Street.



Stockpiles of excavated material and topsoil adjacent the school within the development footprint.



Topsoil stockpiles adjacent the school within the development footprint.



Temporary material laydown area within the construction footprint of the school.



Waste skip present at the school construction site.



Chemical toilets available at the school construction site.



Watering truck available for dust suppression at the school construction site.



The school building under construction.



Internal access road within Phase 19. Material for the road verges laid down temporarily along the road.



Civil services being installed within Phase 19.



Civil services being installed within Phase 19.

Phase 4 (Group Housing Erven No 1 - 173)



Chemical toilet within a single residential construction site in Phase 4.



Construction of a single residence.



Each residential construction site has been screened with shade netting.



Each residential construction site has been screened with shade netting.



Stormwater outlet between Phase 4 and 9 directing stormwater towards the newly created detention swales.



Material stockpiles within construction footprints.



Active cement batching within a single residence in Phase 4.



Cement mixing on the foundation of a residential platform.

Phase 9 (Installation of Bulk Civil Services and Internal Roads)



Internal road being constructed within Phase 9.



Stormwater infrastructure along the road.



Internal road being constructed within Phase 9.



Stormwater and grey water systems being installed within Phase 9.



Chemical toilet within Phase 9.



Cement batching pond within Phase 9 to contain runoff.



Cement batching pond within Phase 9 to contain runoff.



Material stockpiles along the road sections within Phase 9 on the proposed erven locations.



Dustbins present on site at each cement batching area for discarding the ready-mix bags.



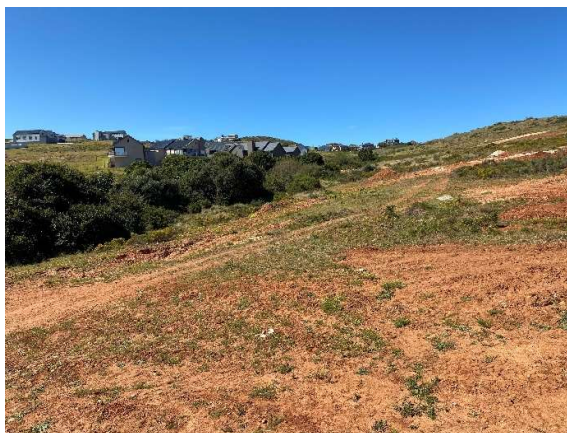
Cement washing spills at batching area within Phase 9.



Topsoil windrowed and utilised along the road verges within Phase 9.



Topsoil windrowed and utilised along the road verges within Phase 9.



Open space corridor and stormwater "valleys" between Phase 9 and 10.



Stormwater outlet from Phase 9 into the natural stormwater valley.



Internal road being constructed within Phase 9.



Cement being transported with TLB and loaded into a wheelbarrow for road verges within Phase 9.



Road verges being constructed within Phase 9.



Generator present without a drip tray, but placed within the road footprint.



Stormwater outlet towards the retention pond north of phase 10.



Stormwater infrastructure leading towards Phase 10.

Phase 10 (Single Residential Zone I)



Condition of access road leading toward Phase 10.



Open Space corridor between residences in Phase 10.



Open Space corridor along Phase 10 as seen towards the northwest from the access road.



Open Space corridor along Phase 10 as seen towards the north from the access road.



Skip present at a construction site within Phase 10.



Condition of a residence being constructed in Phase 10.



Designated Open Space corridor between residences in Phase 10.



Designated Open Space corridors between Phases 8 and 10.



Connection of internal access road within Phase 10.



Designated Open Space corridors between Phases 10 and 12.



Stormwater culvert intake towards the west of Phase 11.



Stormwater culvert outlet along the access road north of Phase 10.



Stormwater culvert outlet along the access road north of Phase 10.



Stormwater infrastructure outlet along the access road north of Phase 10.



Retention wall planted within indigenous vygies.



Grassblocks to act as energy dissipation along the west of Phase 11 along the access road.



Grass swale along the west of Phase 11 with Monte Cristo Estate as seen from Outeniquabosch.



Optimally places stormwater infrastructure along advantageous positions within Phase 10.



Large gabion stormwater culvert discharge infrastructure area for stormwater from Phases 11 - 14.



Large gabion stormwater culvert discharge infrastructure area for stormwater from Phases 11 - 14.

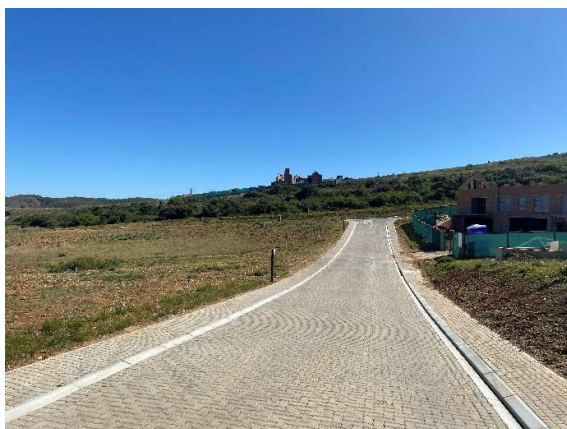
Phase 14, 12, 11 (Single Residential Zone I)



Condition of the site toward Phase 14 (top left) and 12 (right).



Condition of the site toward Phase 12 (middle left) and Phase 11 (top right).



Construction of a large residence within Phase 12.



Construction of a large residence within Phase 12.



View of Phase 14 and 12 from the North.



View of Phase 11 from the North.



View of Phase 14, 12, and 11 from the North.



Condition of Phase 11.

Detention Swales and Ponds



Detention Pond/Wetland between Phase 1 and 2, and Phase 19 under construction.



Detention Swales created underneath Phase 4 to collect stormwater and surface runoff from Phase 4 and 9.



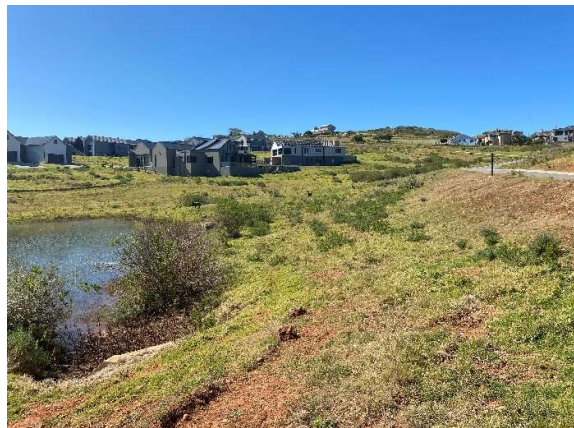
Detention Swales created underneath Phase 4 to collect stormwater and surface runoff from Phase 4 and 9



Detention Swales created underneath Phase 4 to collect stormwater and surface runoff from Phase 4 and 9



Detention Swales created underneath Phase 4 to collect stormwater and surface runoff from Phase 4 and 9



Detention pond between Phase 9 and 10.



Detention pond between Phase 9 and 10.



Open space corridor between Phase 9 and 10.



Stormwater retention area between Phase 10, 14, and 12.



Detention pond Phase 10, 14, and 12.



Detention Swale within Phase 10.



Detention Swale within Phase 10.



Detention Swale within Phase 10.



Detention Swale within Phase 10.



Detention pond beneath Phase 9.



Detention pond being constructed beneath Phase 9.



Detention pond being constructed beneath Phase 9 and 10.



Detention pond being constructed beneath Phase 9 and 10.