

**THE PROPOSED ESTABLISHMENT OF A HOUSING
DEVELOPMENT AND ASSOCIATED INFRASTRUCTURE
ON ERF 10509 AND THE REMAINDER OF FARM CA
597, PHILIPPI.**

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

DEA&DP EIA REF. NO. 16/3/1/1/A2/30/3067/14



Prepared for:

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KAPPEC

20 February 2025

DETAILS OF THIS REPORT

Status of this Report	Final Regulation 34 External Compliance Audit Report
Date Submitted	20 February 2025
Public Review Period	Not Applicable
Report Title	The Proposed Establishment of a Housing Development and Associated Infrastructure on Erf 10509 and the Remainder of Farm CA 597, Philippi.
Applicant	The Municipal Manager City of Cape Town, 21st Floor, Civic Centre 12 Hertzog Boulevard Cape Town 8000 Mr. J. Kuhn (021) 400 2300
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 The logo for KAPP Environmental Consultants features a stylized green leaf icon to the left of the word "KAPP" in large, bold, dark grey letters. Below "KAPP" is the text "ENVIRONMENTAL CONSULTANTS" in a smaller, all-caps, dark grey font.	

DISCLAIMER

This report has been prepared for the Municipal Manager, Mr. J. Kuhn and is subject to and issued in accordance with the agreement with Kapp Environmental Consultants (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 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 Practitioner 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

20 February 2025

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 and Locality Map
Appendix C:	Copy of EA
Appendix D:	Copy of EMPr
Appendix E:	Commencement Notification
Appendix F:	ECO Reports
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INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd (KAPPEC) has been appointed on behalf of the Municipal Manager, Mr. J. Kuhn (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 17 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was granted to the Municipal Manager, Mr. J. Kuhn on June 27, 2018 (DEA&DP EIA Ref: 16/3/1/1/A2/30/3067/14) in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) and The Environmental Impact Assessment Regulations, 2010.

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 EMP. 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 (5 December 2024)
- Documentation audit
- Compilation of environmental audit report
- Submission of environmental audit report (20 February 2025)

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 proposed development involves the clearance of indigenous vegetation for the construction of a low-cost residential development with associated infrastructure on Erf 10509 and the remainder of Farm CA 597, Philippi. The project will provide approximately 409 residential units, consisting of both single and double-storey structures. Each residential plot will have an approximate size of 75 m².

Key infrastructure components of the development include:

- A stormwater detention pond located in the southwestern corner of the site;
- Reticulation pipelines for service delivery;
- Designated open space areas; and
- Internal roads for vehicular and pedestrian access.

The development will utilise existing municipal services such as solid waste management, sewage treatment, and water supply. Electricity will be supplied by Eskom. Primary access to the site will be through Sheffield Road. The total development footprint will cover approximately 5.5 hectares.

The residential units will be designed for optimal living conditions and noise mitigation. The single-storey dwellings will have a width of approximately 8 m and a length of 5 m, designed as semi-detached units. The double-storey dwellings will have a width of approximately 4 m and a length of 5.53 m. Each plot will maintain an approximate footprint of 75 m². Noise reduction features include acoustic ceilings, plastered cavity walls, double glazing for windows, double doors with sound lobbies, and sound-sealed exterior doors.

Alternative design options were considered, including double-storey units with widths of 3.6 m or 6 m and lengths of 5.53 m and single-storey units with widths of 5 m and lengths of 7 m or widths of 5.5 m and lengths of 8 m. However, these alternatives were not preferred due to design constraints and space optimisation considerations.

The proposed development aligns with the City of Cape Town's Integrated Development Plan (2012-2017) and Spatial Development Framework (SDF), which was dated 2012 and amended in 2014. The site has been earmarked for residential use, supporting the objectives of the Provincial Spatial Development Framework by providing essential housing and local employment opportunities. This initiative aims to address housing shortages and support socio-economic growth in the Philippi area.

LISTED ACTIVITIES

The proposed development was previously listed in terms of the NEMA EIA Regulations, 2010 as follows:

Activity 9:

Activity Description:

The construction of facilities or infrastructure exceeding 1000 metres in length for the bulk transportation of water, sewage or storm water-

- (i) with an internal diameter of 0,36 metres or more; or
- (ii) with a peak throughput of 120 litres per second or more,

excluding where:

(a) such facilities or infrastructure are for bulk transportation of water, sewage or stormwater or stormwater drainage inside a road reserve; or

(b) where such construction will occur within urban areas but further than 32 metres from a watercourse., measured from the edge of the watercourse,

Activity 11:

Activity Description:

The construction of:

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

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

Activity 18:Activity Description:

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

- (i) a watercourse;
- (ii) the sea;
- (iii) the seashore;
- (iii) 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;

- (a) is for maintenance purposes undertaken in accordance with a management plan agreed to by the relevant environmental authority; or occurs behind the development setback line,

Activity 23:Activity Description:

The transformation of undeveloped, vacant or derelict land to -

- (i) residential, retail, commercial, recreational, industrial or institutional use, inside an urban area, and where the total area to be transformed is 5 hectares or more, but less than 20 hectares, or
- (ii) residential, retail, commercial, recreational, industrial or institutional use, outside an urban area and where the total area to be transformed is bigger than 1 hectare but less than 20 hectares;

except where such transformation takes place

- (i) for linear activities; or
- (ii) for purposes of agriculture or afforestation, in which case Activity 16 of Notice No. R, 545 applies.

On 04 December 2014, the Minister of Environmental Affairs promulgated regulations in terms of Chapter 5 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), viz, the Environmental Impact Assessment ("EIA") Regulations 2014 (Government Notice No. R. 982, R. 983, R. 984 and R. 985 in Government Gazette No. 38282 of 04 December 2014). Please note that these regulations came into effect on 08 December 2014 and were amended on 07 April 2017. The activities listed below are the similarly listed activities in terms of the NEMA EPA Regulations, 201 (as amended).

The activities listed below are the similarly listed activities in terms of the NEMA EIA Regulations, 2014 (as amended).

Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended):

Activity 27:

Activity Description:

The clearance of an area of 1 hectare or more, but less than 20 hectares of Indigenous vegetation, except where such clearance of Indigenous vegetation is required for -

- (i) the undertaking of a linear activity; or
- (ii) maintenance purposes undertaken in accordance with a maintenance management plan,

in terms of **GN No, R 324 (Listing Notice 3) of 07 April 2017:**

Activity 15:

Activity Description:

The transformation of land bigger than 1000 square metres in size, to residential, commercial, industrial or institutional use, where, such land was zoned open space, conservation or had an equivalent zoning, on or after 02 August 2010.

f. Western Cape

- i. Outside urban areas, or
- ii. Inside urban areas:

- (aa) Areas zoned for conservation use or equivalent zoning, on or after 02 August 2010;
- (bb) A protected area Identified in terms of NEMPAA, excluding conservancies; or
- (cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act as adopted by the competent authority.

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 form 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: LOCALITY MAP

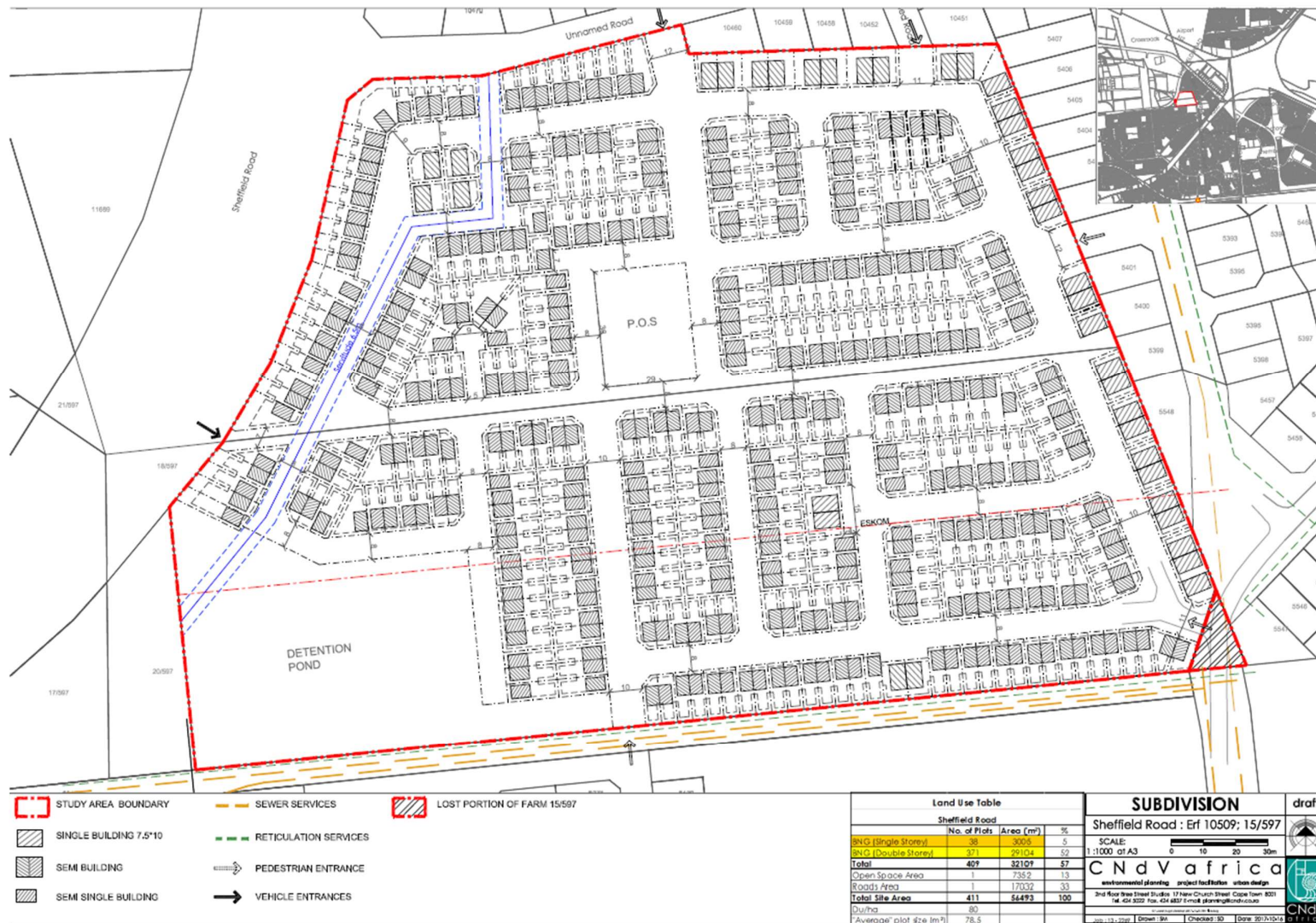


FIGURE 2: SITE DEVELOPMENT PLAN

CONDITIONS OF AUTHORISATION

TABLE 2: ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
1.	The holder is authorised to undertake the listed activities specified in Section B above in accordance with and restricted to the Preferred Alternative, as described in the BAR dated March 2020 on the site as described in Section C above.	The preferred alternative, as authorised, is being implemented on-site.
2.	The holder must commence with the listed activities on site within a period of ten (10) years from the date of issue of this Environmental Authorisation.	A letter to notify the department of the intended commencement of activities was submitted to the Department on 24 October 2022. The holder commenced construction during the end of 2022 and the EA was granted on the 27 th of June 2018, thus within 10 years.
3.	The development must be concluded within 5 (five) years from the date of commencement of the listed activities.	Construction is well underway and all internal roads and associated bulk services are close to being completed. Per this condition 3, the development will need to be completed by the end of October 2027.
4.	The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.	Noted, the holder holds all responsibility for the actions undertaken by anyone on site.
5.	Any changes to, or deviations from the scope of the alternative described 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	No changes or deviations from the scope of the project description have occurred since the EA was obtained/approved.

	acceptance/approval or not, the Competent Authority may request information in order 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.	
6.	A minimum of 7 (seven) calendar days' notice, in writing, must be given to the Competent Authority before commencement of development activities. 6.1. The notice must make clear reference to the site details and EIA Reference number given above. 6.2 The notice must also include proof of compliance with the following conditions described herein: Conditions: 7, 8, and 13.	A notification of commencement was sent to DEA&DP on the 24th of October 2022 and made clear reference to the site details and EIA Reference, although partial site clearance commenced prior to the notification being submitted. The contractor commenced with clearing from the 22nd of September 2022 approximately a month before notification. The letter or commencement included proof/comments of compliance with conditions 7, 8, and 13. Please refer to proof of EA conditions below. Condition 7: The EA was issued on the 27th of June 2018, and the I&APs were notified of the EA on the 29th of June 2018, thus within 2 days from when the EA was issued. Condition 8: The listed activities have not commenced within 20 days from the date of issue of the EA. The EA was granted on the 27th of June 2018 and the construction activities commenced in September 2022. Condition 12: Guillaume Nel Environmental Consultants (GNEC) has been appointed as the Environmental Control Officer (ECO) to conduct monthly audits on compliance in terms of the EA and the Environmental Management Programme (EMPr).

7.	The holder must in writing, within 12 (twelve) calendar days of the date of this decision – 7.1 notify all registered Interested and Affected Parties (“I&APs”) of – 7.1.1 the outcome of the application; 7.1.2 the reasons for the decision as included in Annexure 3; 7.1.3 the date of the decision; and 7.1.4 the date when the decision was issued. 7.2 draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations, 2014 (as amended) detailed in Section G below; 7.3 draw the attention of all registered I&APs to the manner in which they may access the decision; 7.4 provide the registered I&APs with: 7.4.1 the name of the holder (entity) of this Environmental Authorisation, 7.4.2 name of the responsible person for this Environmental Authorisation, 7.4.3 postal address of the holder, 7.4.4 telephonic and fax details of the holder, 7.4.5 e-mail address, if any, of the holder, and 7.4.6 contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeals Regulations, 2010.	The I&AP Notification letter after the approval of the EA was sent on the 29th of June 2018 (2 days after the EA was granted). All of the required information was provided as stipulated in this condition.
8.	The listed activities, including site preparation, must not commence	The holder commenced with the approved listed activities on the

	within 20 (twenty) calendar days from the date the applicant notified the registered I&APs of this decision. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided i.e. the listed activities, including site preparation, must not commence until the appeal is decided.	22nd of September 2022, 4 years after the letter to notify the registered I&APs of this decision was sent. (The I&APs were notified on the 29th of June 2018, and the letter of commencement for site preparation was sent on the 24th of October 2022). No appeals have been lodged against the EA.
9.	The draft Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation is hereby approved on condition that the following amendments are made to the EMPr and must be implemented.	According to the supplied ECO reports and site audit, the contractor is implementing the EMPr on-site. The final amended EMPr were submitted and approved in November 2024.
10.	The recommendations of the Noise impact Assessment Report ("NIA") (compiled by The DDA Environmental Engineers dated October 2017) must be implemented and included in the EMPr: 10.1 The dwellings along Sheffield Road and the north-western section of the proposed development must Include: 10.1.1. Double glazing windows; 10.1.2. Sound sealed exterior doors; 10.1.3. Acoustic ceilings; and Ventilation units. 10.2. The dwellings further away from Sheffield Road must include; 10.2.1. Single glazing windows; 10.2.2. Acoustic ceilings; and 10.2.3. Ventilation units.	The Noise Impact Assessment Recommendations have been included in the amended and approved EMPr or November 2024.
11.	The manner and frequency for updating the EMPr is as follows; Amendments to the EMPr, other than those required by this	Noted, no additional amendments have been requested.

	Environmental Authorisation, must be done in accordance with Regulations 35 to 37 of the NEMA EIA Regulations, 2014 (as amended) or any relevant legislation that may be applicable at the time.	
12.	The EMPr must be included in all contract documentation for all phases of implementation.	An environmental file is available on-site and includes all the necessary documentation (Method Statements, EA, and required EMPr).
13.	The holder must appoint a suitably experienced environmental control officer ("ECO"), or site agent where appropriate, before the commencement of any land clearing or development activities to ensure compliance with the provisions of the EMPr and the conditions contained in this Environmental Authorisation.	Divan Opperman from Guillaume Nel Environmental Consultants was appointed as ECO on the site and submitted monthly reports to DEA&DP.
14.	A copy of the Environmental Authorisation, EMPr, Environmental Audit Reports and compliance monitoring reports must be kept at the site of the authorised activities during the development activities whereafter It must be kept at the office of the applicant and must be made available to anyone on request.	A copy of the EA, audit reports, and EMPr has been placed on file in the site file.
15.	Access to the site referred to in Section C above must be granted, and the environmental reports mentioned above 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.	Access to the site referred to in Section C is granted, the environmental reports will be presented to the Competent Authority who requests to see it.
16.	An integrated waste management approach, which is based on waste minimisation and incorporates reduction, recycling, re-use and disposal, <i>where</i> appropriate, must be employed. Any solid waste must be disposed of at a landfill licensed in terms of the applicable	According to the supplied ECO reports and photographs, crushed material has been used to create a stable platform on site.

	legislation.	The contractor is reminded to please follow an integrated waste management approach.
17.	In terms of Regulation 69 (8) of the NEMA EIA Regulations, 2010, the holder of this environmental authorisation must undertake an environmental audit (on completion of the clearance activities) and submit the Audit Report to the Competent Authority. 17.1, The holder must undertake an environmental audit within 6 (six) months of the commencement of the listed activities and submit an Environmental Audit- Report to the Competent Authority 1 (one) month after the completion of the listed activities. A final Environmental Audit Report must be submitted to the Competent Authority within 1 (one) year after the proposed development has been completed. 17.2. The holder must, within 7 (seven) days of the submission of the report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request.	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed on behalf of the Applicant as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 17 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended). The I&AP's will be notified within 7 calendar days after the submission of the audit reports to the Competent Authority
18.	Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape.	No heritage remains have been exposed during excavations as of yet.

	18.1. Heritage remains include: meteorites, archaeological and/or palaeontological remains (including fossil shells and trace fossils); 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 with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material. 18.2. A qualified archaeologist and/or palaeontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority.	
19.	Dust suppression methods must be used to mitigate dust during the development. No potable water must be used to mitigate dust nuisance. Alternative dust suppression methods must be implemented instead.	The contractor is actively managing and mitigating dust on-site. They have obtained a permit from the City of Cape Town Municipality to use treated effluent for this purpose. Additionally, water pumped from the excavation areas is being utilized to further control dust.
21.	Employment opportunities must be afforded to the local community (as far as possible) during all phases of the proposed development.	The contractor has reported that 20 local residents are currently employed as part of the workforce.

SITE AUDIT FINDINGS

A detailed walkthrough site visit was conducted on the 5th of December 2024 to assess the progress of the ongoing construction activities in line with Condition 17 of the environmental authorization. The auditor was accompanied on site by the contractor's representative, the contractors environmental and safety officer, as well as the ECO to assist in providing additional information on site. The contractors site camp is located within the future public open space area towards the middle of the site. Chemical toilets are in place within the contractors' camp area and an environmental file is in place within the contractor's office. The environmental file is up to date and contains all documentation as required in the EMPr.

The site was previously used as an illegal dump site for litter and rubble. Thus, the ECO noted that the quality of the topsoil on site did not justify the retention thereof for any rehabilitation purposes. The topsoil and most of the litter and rubble previously covering the site has been stripped and removed from site. Most of the excavated material and rubble was delivered to the City of Cape Town Coastal Park Landfill site, with clean rubble also taken to the crushing facility at the offices of the contractor. Furthermore, upon request a small amount of rubble and soil was delivered to the St Johns Apostolic Faith Mission at Lanzerac Street, in Philippi.

The bulk services have been completed at the time of audit. Most of the bulk services including sewers and stormwater have been installed within the roads. At the time of audit, the works on site had been halted. Only limited construction activities were underway, including the installation of kerbs along the recently surfaced internal roads. Batching of kerb mix was underway at the time of audit and the batching was conducted on mixing boards.

The site has been fenced in at the commencement of works. Formal permeable concrete fencing has been erected along the western boundary of the site with Sheffield Road, as well as along the southern boundary of the site and at intermittent areas along the rest of the boundaries. Existing vibracrete walls are in place at sections along the back of existing residences.

Provision has been made for litter and packaging waste adjacent the contractors' camp area with skips and bins in place. These must be covered if required and emptied timeously to prevent litter and plastics from being blown around, specifically as it ends up in the stormwater detention pond. Per the available ECO reports, this often occurs, and the pond needs to be kept free from litter even if originating outside the development footprint.

Some clean builders' rubble was noted at the contractors' entrance to the site off Gcubane Road. This will be crushed and reused. Two soil and rubble stockpiles were also noted on site towards the east and the west of the contractors' camp, which is yet to be removed from site.

Sparse alien vegetation has started to establish, although these will be removed once building on the erven commences. No dust generation was noted at the time of audit. The ECO has requested that the dust be monitored, and suppression implemented if needed.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 3: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Site Demarcation and No-Go/Sensitive Areas	
1.1	The surveys for the overall project area and construction footprint as approved in the Environmental Authorisation (EA) must be clearly demarcated before the contractors set up their crew camps or begin construction.	The development footprint boundaries were demarcated with permanent permeable concrete fencing prior to clearing and commencement of works.
1.2	No access should be allowed to any watercourse(s). The site area must be limited and demarcated (danger tape) to the minimum area necessary to carry out the works.	The stormwater detention pond has been demarcated using painted wooden droppers, no danger tape or netting was in place. This form of demarcation is deemed appropriate, and these must be maintained and reinstated as needed. The development area has been sufficiently fenced off to the public.
1.3	These no-go areas (watercourses and the applicable setback area) must be demarcated with fencing/warning tape and signs before any construction activities commence. These areas and the type of fencing/demarcation must be approved by the relevant specialist involved in the EIA process. The EO and ECO must be on site in order to make sure the correct areas are fully demarcated.	The stormwater detention pond has been demarcated using painted wooden droppers, no danger tape or netting was in place. This form of demarcation is deemed appropriate, and these must be maintained and reinstated as needed. The development area has been sufficiently fenced off to the public.
1.4	The construction footprint must be kept to a minimum by constructing boundaries and demarcated around areas not to be disturbed.	All construction activities have remained within the boundaries of the development footprint. The contractors site camp has been placed within the footprint to be rehabilitated as public open space. No topsoil is in place at this location and this area is thus not deemed natural. The stormwater detention pond has been appropriately demarcated with painted wooden stakes in place along all the boundaries of the site.

1.5	During construction no heavy machinery may enter indigenous vegetation or any wetland areas that may be present along the construction activities. The watercourses (even if dry) must be seen as no-go areas.	During the site audit, it was observed that the watercourse had been demarcated using droppers; no danger tape or netting was in place. The contractor is required to ensure the demarcation is maintained and reinstated as needed. No heavy machinery was present during the site visit.
1.6	Topsoil stockpiles must be clearly demarcated as no-go areas.	The site was previously used as an illegal dump site for litter and rubble. Thus, the ECO noted that the quality of the topsoil on site did not justify the retention thereof for any rehabilitation purposes. The topsoil and most of the litter and rubble previously covering the site has been stripped and removed from site.
2.	Flora	
2.1	No construction activities will take place further than 1 meter from the existing tarred surface, and all areas outside this 1-meter construction area, will be demarcated as no-go areas.	Internal roads have been demarcated along with the 1-meter buffer area using droppers. Only the development footprint has been disturbed.
2.2	Construction vehicles will also need to turn inside the existing road width, as travelling over indigenous vegetation outside the 1 meter construction buffer is strictly not allowed.	No construction vehicles were present during the site audit. A large turning and access area is available at the entrance of the site.
2.3	The contractor must rehabilitate the construction camp and any other disturbed areas once construction activities have terminated. Compacted areas will be ripped and mulched in order to ensure recovery of the natural vegetation cover.	Noted. The contractors site camp has been placed within the footprint to be rehabilitated as public open space. No topsoil is in place at this location and this area is thus not deemed natural. Rehabilitation efforts of this open space as the detention pond will begin after construction is completed.
2.4	No open fires shall be allowed on site under any circumstances, fires will only be permitted in adequate facility within the crew camp, Forest Act, 1984 (Act No. 122 of 1984).	No evidence of fires was observed during the site audit.
2.5	Disturbances to surrounding indigenous vegetation will be kept to an absolute minimum.	No evidence of disturbed indigenous vegetation outside the development footprint was observed during the site audit.

3.	Stockpiles	
3.1	All stockpiled material must be easily accessible on site without any environmental damage of the surrounding properties.	Building material is currently stockpiled within the contractors' camp as well as east of the contractor's camp.
3.2	All temporarily stockpiled material must be stockpiled in such a way that the spread of materials is minimised. In the case of strong wind and/or rain all stockpiled material must be covered with a tarpaulin in order to prevent erosion. All exposed soils must be protected for the duration of the construction phase with a suitable geotextile (e.g. Geojute or hessian sheeting) in order to prevent erosion and sedimentation of the watercourses in close proximity to these stockpiles.	Two soil and rubble stockpiles were also noted on site towards the east and the west of the contractors' camp, which is yet to be removed from site. All stockpiles are located away from the surrounding properties. These stockpiles have not been covered, but as per the supplied ECO reports, stockpiles are removed from site regularly and waste disposal slips are available in the environmental file. A small stockpile of clean builders' rubble is available near the construction access for removal and reuse.
3.3	The stockpiles may only be placed within the demarcated areas, outside of delineated watercourses, the location of which must be approved by the RE, EO or ECO.	Two soil and rubble stockpiles were also noted on site towards the east and the west of the contractors' camp, which is yet to be removed from site. All stockpiles are located away from the surrounding properties and no drainage lines nor watercourses are present on the site.
3.4	Stockpiles must not be higher than 3 meters to avoid compaction thereby maintaining the soil integrity and chemical composition.	During the site audit no stockpiles was higher than 3 meters. These stockpiles will also not be reused on site.
3.5	No material may be stockpiled within 32 metres of any watercourse(s).	No stockpiles are located within 32m from the stormwater detention pond. This pond is fed from stormwater infrastructure.
3.6	The contractor/ECO will take cognisance with regard to weather forecasts and prepare/maintain the construction area. All relevant stockpiles, plant and construction equipment will be removed from the construction area prior to possible flooding events.	Noted, the contractor to take cognisance of possible inclement weather forecasts which could result in flooding and protect the condition and material on site accordingly.
3.7	No building materials (sand, aggregate, topsoil, etc.) will be	No building material stockpiles were in place on site at the time of

	stockpiled in or near any watercourse(s).	audit as construction activities have temporarily been halted. Two soil and rubble stockpiles were also noted on site towards the east and the west of the contractors' camp, which is yet to be removed from site.
3.8	Soils from different horizons must be stockpiled such that topsoil stockpiles do not get contaminated by sub-soil material.	The site was previously used as an illegal dump site for litter and rubble. The ECO noted that the quality of the topsoil on site did not justify the retention thereof for any rehabilitation purposes. The topsoil and most of the litter and rubble previously covering the site has been stripped and removed from site.
3.9	Topsoil stockpiles must be monitored for invasive exotic vegetation growth. Contractors must remediate as and when required in consultation with the EO, RE and ECO.	The topsoil and most of the litter and rubble previously covering the site has been stripped and removed from site. No topsoil is stockpiled on site.
4.	Topsoil Management	
4.1	All areas where earthworks are to take place will have the topsoil removed and stockpiled for rehabilitation purposes.	The site was previously used as an illegal dump site for litter and rubble. Thus, the ECO noted that the quality of the topsoil on site did not justify the retention thereof for any rehabilitation purposes. The topsoil and most of the litter and rubble previously covering the site has been stripped and removed from site.
4.2	Topsoil stockpiles will not exceed 3 metre in height.	The topsoil and most of the litter and rubble previously covering the site has been stripped and removed from site. No topsoil is stockpiled on site.
4.3	Topsoil must be regarded as no-go areas.	The topsoil and most of the litter and rubble previously covering the site has been stripped and removed from site. No topsoil is stockpiled on site.
5.	Oil and Chemicals	
5.1	These substances must be confined to specific and secured areas within the contractor's camp, and in a way that does not pose a danger of pollution even during times of high rainfall. These areas must be imperviously bunded with adequate	Lockable storage containers are available on-site at the contractors. Material Safety Data Sheets are in place within the environmental file, and all safety signage has been erected at the contractors' camp containers. This is deemed sufficient.

	containment (at least 1.1 times the volume of the fuel) for potential spills or leaks.	
5.2	Drip trays (minimum of 10cm deep) must be placed under all machinery and vehicles. The surface area of the drip trays will be dependent on the vehicle and must be large enough to catch any hydrocarbons that may leak from the vehicle while standing. The depth of the drip tray must be determined considering the total amount / volume of oil in the vehicle. The drip tray must be able to contain the volume of oil in the vehicle.	No handling of oils and chemicals nor hazardous material requiring bunding, drip trays, or mortarboards was active during the site audit. From the available ECO reports it is noted that the ECO previously requested the contractor to use drip trays under generator pump to which the contractor complied.
5.3	Any spills larger than 100ℓ should be reported to all local authorities. Spill kits must be available on site and in all vehicles that transport hydrocarbons for dispensing to other vehicles on the construction site. Spill kits must be made up of material/product that is in line with environmental best practice (sunsorb is a recommended product that is environmentally friendly).	No spills have been recorded or reported. A spill kit is located at the site camp.
5.4	All spilled hazardous substances must be contained in impermeable containers for removal to a General & Hazardous Waste Landfill site, (this includes contaminated soils, and drenched spill kit material).	No spills have been recorded or reported. A spill kit is located at the site camp.
5.5	Vehicles to be serviced at the contractor laydown area and all refuelling to take place outside of the watercourses and the applicable variable buffer.	Noted, during the site audit no vehicle servicing took place.
6.	Method Statements The ECO will evaluate the method statement and ensure that it covers the handling of the following aspects: • Emergency spills procedures for the contamination of soils from spills and fire. • Handling & storage of oils and chemicals.	Method statements were available on file on site. The contractor submitted the following method statement to the ECO. • Handling of Hazardous Substances • Cement and Concrete Handling

	• Cement and concrete batching, which includes the storage, washing & disposal of cement, packaging, tools and plant. • Diesel tanks and refuelling procedures. • Crew camps and construction laydown areas. • Workshop maintenance and cleaning of plant.	• Dust Control • Noise and Vibration • Site Establishment
7.	Cement	
7.1	It is suggested that ready-mix cement be used as far as possible to minimize the possible impact on the surrounding environment.	Small scale kerb mixing was underway at the time of audit, which was done on a mortar board, please refer to the photo pages. No other cement works were underway and no concrete spills were observed during the audit.
7.2	No contaminated water-runoff from any in-situ concrete works may be allowed. Waste concrete may not be dumped in or surrounding the watercourses and must be taken off site.	Some clean builders' rubble was noted at the contractors' entrance to the site off Gcubane Road which will be crushed offsite and reused. Two soil and rubble stockpiles were also noted on site towards the east and the west of the contractors' camp in the middle of the site. No waste or concrete is located within close proximity to the detention pond.
7.3	Concrete spilled outside of the demarcated area must be promptly removed and taken to a suitably licensed waste disposal facility.	No batching or pouring of concrete was observed during the audit. Two soil and rubble stockpiles were also noted on site towards the east and the west of the contractors' camp in the middle of the site. Proof of waste disposal slips are available on site where rubble is frequently taken to the CoCT Coastal Park facility.
7.4	The mixing of concrete shall only be done at selected sites on mortar boards or similar structures to contain run-off into natural vegetation, soils and streams.	Small scale kerb mixing was underway at the time of audit, which was done on a mortar board, please refer to the photo pages.
7.5	Cleaning of cement mixing and handling equipment shall be done using proper cleaning trays.	Small scale kerb mixing was underway at the time of audit, which was done on a mortar board, please refer to the photo pages
7.6	All empty containers must be stored in a dedicated area and later	No empty containers were noted, although storage areas are in

	removed from the site for appropriate disposal at a Licensed Landfill site. All empty cement bags are to be picked up immediately to ensure that cement dust is not blown away.	place at the contractors camp, as well as at the waste skips towards the immediate east.
7.7	Empty cement bags are to be stored in a weather and scavenger proof bin, in order to prevent leaching and groundwater contamination.	No cement work was observed during the audit. Storage areas are in place at the contractors camp, as well as at the waste skips towards the immediate east. These were not covered at the time of audit.
7.8	Any spillage that may occur must be investigated and immediate remedial action shall be taken.	No cement works were underway at the time of audit and no evidence of spills were noted.
7.9	The visible remains of concrete, either solid, or from washings, shall be physically removed immediately and disposed of as waste to a Licensed Landfill site.	No cement works were underway at the time of audit and no evidence of spills were noted.
7.10	Washing of the remains into the ground is unacceptable.	No cement works were underway at the time of audit and no evidence of spills were noted.
7.15	A batter/dagga board mixing trays and impermeable sumps should be provided, onto which any mixed concrete can be deposited whilst it awaits placing.	Small scale kerb mixing was underway at the time of audit, which was done on a mortar board, please refer to the photo pages
8.	Dangerous and Toxic Materials	
8.1	Materials such as fuel, oil, paint, herbicide and insecticides must be sealed and stored in bermed areas or under lock and key, as appropriate, in well-ventilated areas.	Oils and chemicals are stored at the site camp area in suitable containers. No large-scale fuel storage occurs on site.
8.2	Storage facilities should be bunded, roofed, secure, rain, wind and tamper-proof.	Oils and chemicals are stored at the site camp area in suitable containers. No large-scale fuel storage occurs on site.
8.3	Storage areas shall display the required safety signs depicting “no smoking”, “No Naked lights” and “Danger” containers shall be clearly marked to indicate contents as well as safety requirements.	Lockable storage containers are available on-site at the contractors. Material Safety Data Sheets are in place within the environmental file, and all safety signage has been erected at the contractors’ camp containers. This is deemed sufficient.

8.4	Sufficient care must be taken when handling these materials to prevent pollution. Training on the handling of dangerous and toxic materials must be conducted for all staff prior to the commencement of construction. In the case of pollution of any surface or groundwater, the Regional Representative of the Department of Water and Sanitation (DWS) must be informed immediately.	Proof of environmental inductions and toolbox talks are in place as part of the environmental file on site. No spills were noted on site and none reported in the available ECO reports.
8.5	Excess grease will be removed from any and all machinery before plant works in or near any watercourses.	Noted, no construction machinery was observed during the site audit.
8.6	All hazardous material (temporary toilets, fuel storage tanks, lubricants, paints, cement, cement additives, etc.) will be kept a minimum of 32 metres from the watercourse(s) and will be properly secured.	The site camp and associated storage containers are located more than 32m away from the detention pond on-site.
9.	Bulk Storage of Fuels and Oils	
9.1	Bulk fuel storage tanks on the site shall be on an impervious surface that is bunded and able to contain at least 110% of the volume of the tanks.	No bulk fuel storage tanks were on-site at the time of the audit.
9.2	Bulk fuel storage tanks shall be located in a portion of the construction camp where they do not pose a high risk in terms of water pollution.	No bulk fuel storage tanks were on-site at the time of the audit.
9.3	Bulk fuel storage tanks shall be placed so that they are out of the way of traffic, so that the risk of the tanks being ruptured or damaged by vehicles is minimised.	No bulk fuel storage tanks were on-site at the time of the audit.
9.4	Bulk fuel storage should be covered during the rainy season.	No bulk fuel storage tanks were on-site at the time of the audit.
10.	Use of Dangerous and Toxic Materials	
10.1	The contractor shall keep the necessary materials and equipment on-site to deal with spills/fires of the materials present should they occur.	Firefighting equipment and an oil spill kit are readily available on-site at the site camp. No spills have been recorded or reported on-site.

10.2	The contractor shall set up a procedure for dealing with spills/fires, which will include notifying the ECO and the relevant authorities prior to commencing construction. These procedures must be developed in consultation and approval by the appointed EO. All staff should receive some form of fire training.	An incident reporting system has been included in the on-site file. No incident has been recorded to date.
10.3	Fire buckets and hoses shall be in good working order and easily accessible on site.	Firefighting equipment and an oil spill kit are readily available on-site at the site camp.
11.	Contractors Camp Site and Crew Camps	
11.1	The Contractor shall, in conjunction with the EO, designate the restricted eating area for eating during normal working hours. Two refuse bins with lids must be provided and cleaned on a daily basis. The bins are to be secure, wind, weather and scavenger proof. Designated areas for smoking must be provided.	Noted, the site camp has been established and is in good and clean condition. A dedicated staff structure is available which also serves as the eating area within the contractors site camp. Bins have been provided within the site camp. No litter was observed during the site audit.
11.2	No fires are to be lit outside of a facility designed to contain fires. The adequacy and positioning of these structures must be determined in consultation with the EO and ECO.	No evidence of fires was observed during the site audit.
11.3	No animals, domestic or otherwise are allowed on the premises. The feeding, or leaving of food, for stray or other animals in the area is strictly prohibited.	No evidence of domestic animals was observed during the site audit.
11.4	Litter (even if originating outside the camp) and concrete bags etc. must be picked up and put into suitably closed bins. The contractor shall provide labourers to clean up the contractor's camp and construction site on a daily basis. These areas shall then be inspected by the contractor or his/her ESO to ensure compliance with this requirement. Rubble and litter must be removed every two weeks or more often as the need arises and be disposed of at a registered landfill site as designated by the Local Municipality's solid waste removal department.	Provision has been made for litter and packaging waste adjacent (east) to the contractors' camp area with skips and bins in place. These must be covered if required and emptied timeously to prevent litter and plastics from being blown around, specifically as it ends up in the stormwater detention pond. Proof of waste disposal slips are on record within the Environmental File on site.

11.5	Accommodation for members of the workforce will not be permitted on site unless authorisation has been given in terms of the Environmental Authorisation issued for the site.	Noted, no accommodation facilities were observed during the site audit.
11.6	Dedicated wash areas must be situated away from surface water sources.	Noted, no specific washing areas were observed during the site audit, and none were referenced in the ECO reports. Any required washing of equipment to occur within the bounds of the site camp, located away from the watercourse.
11.7	The contractor's camp shall be monitored for dust fallout and dust suppression applied as required. This may include the laying of gravel; the use of grey water can be considered as an option if the required permits have been acquired.	No dust fallout should occur at the site camp due to its shape and size. No dust generation was noted at the time of audit. The ECO has requested that the dust be monitored, and suppression implemented if needed.
11.8	The contractor's camp, offices and storage facilities shall be located within the site boundaries. If this is not feasible an alternative should be designated in consultation with the ECO.	Complied with, the site camp is located within the center of the site in the future public open space area.
11.9	The contractor shall provide labourers to clean up the contractor's camp and construction site on a daily basis. These areas shall then be inspected by the contractor or his/her ESO to ensure compliance with this requirement.	The contractors camp and the site in general are in good and clean condition throughout.
11.10	The contractor shall be responsible for cleaning the contractor's camp and construction site of all structures, equipment, residual litter and building materials at the end of the construction period and, the topsoil restored in areas where landscaping is to take place.	The contractors camp and the site in general are in good and clean condition throughout.
12.	Ablution Facilities	
12.1	The contractor will be responsible for providing all sanitary arrangements for his and the sub-contractors team. It is proposed that that one toilet for 15 people will be established on site.	A chemical toilet is in place on site as well as within the contractors camp area. These toilets are secured to the ground and fence.
12.2	Sanitary arrangements shall be to the satisfaction of the ECO and	The chemical toilets are in good clean condition.

	the local authority. The contractor shall keep the toilets in a clean, neat and hygienic condition. The contractor shall supply toilet paper at all toilets at all times. Toilet paper dispensers shall be provided in all toilets.	
12.3	Toilets provided by the contractor must be easily accessible and a maximum of 150m from the works area to ensure they are utilised. All toilets will be located within the contractor's camp. Should toilets be needed elsewhere, their location must first be approved by the ER, ECO.	A chemical toilet is in place on site as well as within the contractors camp area. These toilets are secured to the ground and fence. These are both within 150m to all site boundaries.
12.4	The contractor (who must use reputable toilet-servicing company) shall be responsible for the cleaning, maintenance and servicing of the toilets. The contractor (using reputable toilet-servicing company) shall ensure that all toilets are cleaned and emptied before the builders' or other public holidays.	Proof for the regular servicing of the chemical toilets on site is available in the environmental file on site. Please refer to the photo pages attached as Appendix A.
12.5	Toilets out on site must be secured to the ground and have a sufficient locking mechanism operational at all times.	A chemical toilet is in place on site as well as within the contractors camp area. These toilets are secured to the ground and fence.
13.	Dust	
13.1	Potable water may not be used as a means of dust suppression, alternative measures must be sourced. The use of 'grey' water must be investigated as an alternative. The contractor will be responsible to source this water and obtain the required approvals. Dust mitigation measures to include the use of chemical dust suppressants, such as Lignosulphonates; and the use of soil stabilisers such as straw for large open ground areas.	No dust generation was noted at the time of audit. The ECO has requested that the dust be monitored, and suppression implemented if needed.
13.2	The construction camp shall be treated with dust suppression during dry and windy conditions to control dust fallout. Dust production must be controlled by regular dust suppression of roads and works area, should the need arise. (NB: Concrete dust	No dust fallout should occur at the site camp due to its shape and size covering almost the entire footprint. No dust generation was noted at the time of audit. The ECO has requested that the dust be monitored, and suppression implemented if needed.

	is toxic and damages soil properties. Therefore, dust suppression to prevent dust spread must not be done where concrete dust has fallen or it will infiltrate into the soil. Concrete bags must not be allowed to blow around the site and spread cement dust.)	
13.3	At the end of construction, the site camp must be fully rehabilitated by removing the temporary surface and ripping the area to loosen the soil.	Rehabilitation of the site camp, which is to serve as public open space will commence after the completion of works.
13.4	All vehicles transporting material that can be blown off (e.g. soil, rubble etc.) must be covered with a tarpaulin, and speed limits of 20 km/h must be adhered to.	Noted, no vehicles were present on site at the time of audit.
14.	Noise	
14.1	Work hours during the construction phase shall be strictly enforced unless permission is given (07H00 – 18H00). Permission shall not be granted without consultation with the local industries and businesses by the EO. No work to be done on Sundays. The EO must inform the residents of houses and businesses adjacent to the development in writing 24 hours prior to any planned activities that will be unusually noisy or any other activities that could reasonably have an impact on the adjacent sites. These activities could include, but are not limited to use of pneumatic jack-hammers and compressors etc. No noise louder than 70dB from the ambient noise level.	All construction activities have been restricted to working hours.
14.2	Noise reduction is essential, and contractors shall endeavour to limit unnecessary noise, especially loud talking, shouting or whistling, radios, sirens or hooters, motor revving, etc. The use of silent compressors is a specific requirement. All machinery to be muffled where possible.	Noted, no noise complaints have been received as per the complaints register on file. At the time of audit, no construction activities were underway.
14.3	The dwellings along Sheffield Road and the north-western section	Noted, this will be audited once construction of the residential

	of the proposed development must include: • Double glazing windows • Sound sealed exterior doors • Acoustic ceilings and • Ventilation units	units commence.
14.4	The dwellings further away from Sheffield Road must include: • Single glazing windows • Acoustic ceilings and • Ventilation units	Noted, this will be audited once construction of the residential units commences.
15.	Hydrology	
15.1	Increased run-off during construction must be managed using suitable structures as required to ensure flow velocities are reduced; this must be done in consultation with the Resident engineer as well as the ECO. The Contractor shall take reasonable measures to control the erosive effects of storm water runoff (If and where applicable).	Dewatering activities were conducted on site as evidenced from the available ECO reports. Formal stormwater infrastructure has now been completed leading to the stormwater detention pond. No further measures have been required, given the nature of the site.
15.2	Storm water, wherever possible, should be allowed to soak into the land in the area on which the water fell.	All formal erven are still undeveloped, and stormwater can soak into the land. Furthermore, formal stormwater infrastructure has now been completed leading to the stormwater detention pond.
15.3	In the event of pollution caused as a result of construction activities, the contractor, according to section 20 of the National Water Act, 1998 (Act No. 36 of 1998) shall be responsible for all costs incurred by organisations called to assist in pollution control and/or to clean up polluted areas and water courses.	This is noted. No pollution has occurred on site and no spills have been reported in the available ECO reports.
15.4	In case of flooding events, the contractor/ECO will remain on site (even after hours) to check that diversions keep pace with rising water levels, and to remove any debris floating downstream.	Contractor to take note of this. To date, no flooding events have occurred that compromised the development area or the detention pond.

16.	Fires	
16.1	Fire training and equipment to be nearby to put fires out. The Contractor shall ensure that there is appropriate fire-fighting equipment available on site at all times.	Firefighting equipment is available on-site at the contractor's camp.
16.2	Fires must be within designated areas and must be in small scale. Absolutely no burning of waste is permitted.	No evidence of fires was observed during the site audit.
16.3	Fires will only be allowed in facilities especially constructed for this purpose within fenced Contractor's camps. Wood and/or charcoal are the only fuels permitted to be used for fires. The contractor must provide sufficient wood (fuel) for this purpose. Fires in the designated areas must be small in scale so as to prevent excessive smoke being released into the atmosphere. Heavy smoke may not be released into the air.	No evidence of fires was observed during the site audit.
17.	Erosion and Sedimentation	
17.1	To reduce the loss of material by erosion, the contractor shall ensure that disturbance on site is kept to a minimum. The disturbance especially includes the movement of heavy vehicles. These areas must be cordoned off so that vehicles or construction personnel cannot gain access to these areas.	No sedimentation was observed within the stormwater detention pond. The individual erven to be developed have only been cleared of vegetation and rubble, and soils have been retained in place. Please refer to the photo pages attached as Appendix A for visual proof of the conditions on site.
17.2	The contractor shall be responsible for rehabilitating all eroded areas in such a way that the erosion potential is minimised after construction has been completed. These areas are to be filled with mulch or funnels constructed to route the water. All disturbed areas that will not be rehabilitated within the construction phase, must be mulched to encourage vegetation re-growth. Mulch used must be free from alien seed.	No erosion or sedimentation was observed during the site audit. The areas to be rehabilitated include the contractors camp which is to be utilized as public open space and the stormwater detention pond. The remainder of the site is to be formalized and developed.
17.3	In the case of strong wind and/or rain all stockpiled material must be covered with a tarpaulin in order to prevent erosion.	Two soil and rubble stockpiles were noted on site towards the east and the west of the contractors' camp, which is yet to be removed

		from site. <u>In the case of strong wind and/or rain these stockpiles must be covered with a tarpaulin to prevent erosion.</u>
18.	Fauna	
18.1	All construction workers must be informed that the intentional killing of any animal is not permitted as faunal species are a benefit to society. Poaching is illegal and it must be a condition of employment that any employee caught poaching will be dismissed. Employees must be trained on how to deal with fauna species as intentional killing will not be tolerated. In the case of a problem animal e.g. a large snake a specialist must be called in to safely relocate the animal if the EO or ECO is not able to.	The workers have been informed of this through the environmental inductions and toolbox talks. Proof of these is included in the environmental file on site. No fauna encounters have been noted in the ECO reports nor conveyed during the site visit.
20.	Visual Impact	
20.1	Shade cloth must be utilised to conceal and minimise the visual impact of contractor camps, lay down and storage areas.	The site has been fenced in at the commencement of works. Formal permeable concrete fencing has been erected along the western boundary of the site with Sheffield Road, as well as along the southern boundary of the site and at intermittent areas along the rest of the boundaries. The site camp and the material laydown area has been demarcated with temporary fencing. Some building materials have been temporarily stored and have been demarcated with orange netting (shade cloth). Shade cloth is also in place along short intersections on the site boundary.
20.2	Rubble and litter must be removed every two weeks or more often as the need arises and be disposed of at a registered landfill site as designated by the City of Cape Town Municipality, Solid Waste removal department.	Two soil and rubble stockpiles were also noted on site towards the east and the west of the contractors' camp, which is yet to be removed from site. All stockpiles are located away from the surrounding properties. It is not clear how long these stockpiles have been in place on site, but as per the supplied ECO reports, stockpiles are removed from site regularly and waste disposal

		slips are available in the environmental file.
21.	Soil	
21.1	Topsoil must be stripped from all areas that are to be utilized during the construction period and where permanent structures and access is required. These areas will include comprising the permanent works, pipeline trenches, stockpiles, access roads, construction camps and lay down areas.	The site was previously used as an illegal dump site for litter and rubble. Thus, the ECO noted that the quality of the topsoil on site did not justify the retention thereof for any rehabilitation purposes. The topsoil and most of the litter and rubble previously covering the site has been stripped and removed from site.
21.2	Topsoil must be deemed to be the top layer of soil containing organic material, nutrients and plant grass seed. For this reason, it is an extremely valuable resource for the rehabilitation and vegetation of disturbed areas. At the beginning of the construction phase, topsoil removed for vegetation clearance must be stripped to a minimum depth of 300 mm and windrowed.	The topsoil and most of the litter and rubble previously covering the site has been stripped and removed from site.
21.3	All topsoil must be removed and stockpiled on the site. However, the use of topsoil for rehabilitation contaminated by the seed of alien vegetation must not be permitted unless a programme to germinate the seed and eradicate the seedlings is drawn up and approved, or some other mitigatory feature is found. This must be approved by the ECO.	The topsoil and most of the litter and rubble previously covering the site has been stripped and removed from site.
21.4	Single handling is recommended. Stockpiles must not be higher than 2m to avoid compaction.	No topsoil stockpiles are present on site.
22.	Traffic	
22.1	Efficient road markings must be available to inform motorists should they prefer to travel a different route.	Access to the site and site boundaries have been sufficiently marked with construction signage at the intersections.
22.2	Access to private properties, commercial and recreational areas must remain open for the entire length of the project's life-cycle.	All accesses to private properties, commercial and recreational areas have remained open.

CONCLUSION

Based on the information obtained and a site visit conducted on the 5th of December 2024, the applicant has sufficiently complied with the conditions of the Environmental Authorisation and EMPr. 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.

Any partial non-compliance with the EMPr have been outlined within Table 4 of this report.

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



The intersection of Gcubane Road with Sheffield Road as seen towards the west toward Sheffield road.



Existing construction access off Gcubane Road with the required safety and construction signage on the gates.



Entrance to the site securely closed off to the public during construction.



Stormwater manholes installed towards the northern boundary of the site.



Newly surfaced internal road within the development where a service manhole can also be seen.



Kerbs being installed within the development footprint. A mixing board in place for the kerb mix.



Building rubble temporarily stockpiled near the construction entrance.



Condition of the recently surfaced internal road along the Sheffield road boundary with service manholes.



Kerbs being installed near the northern boundary and the temporary construction access.



View of the contractors site offices and storage containers areas within the future public space area.



Chemical toilet in place adjacent the current works and secured to the ground.



Material laydown area sufficiently demarcated with orange netting in place.



Temporary laydown area immediately east of the contractors camp with temporary fencing.



Waste skips in place at the laydown area. Proof of disposal slips are available in the environmental file.



Temporary material laydown area, with material fenced in.



Empty bitumen drums and flowbins for water storage in place at the material laydown area.



The contractors site offices located in the centre of the development footprint at the future public open space.



The contractors site offices located in the centre of the development footprint at the future public open space.



Contractors camp and eating area also serving as the emergency assembly point.



Condition of the contractors camp showing several additional storage containers.



Material laydown areas neatly stored within the contractors camp.



Excavated soils and builders rubble stockpiles behind the material laydown area.



Condition of the site along the eastern boundary of the site as seen towards the south.



Condition of the newly surfaced road along the eastern boundary seen towards the south.



The newly surfaced road at the southeastern corner of the site connecting to Ngqwangi Drive.



From the southwestern boundary of the site as seen towards the west.



Along the south boundary of the site, as seen towards the west.



Along the south boundary of the site, as seen across the site towards the northwestern corner of the site.



Condition of the civil services connection points completed along the internal roads.



From the internal road as seen towards the southwest in the direction of the stormwater detention pond.



Current condition of the stormwater detention pond with some bullrush and acacia shrubs.



Current condition of the stormwater detention pond with some bullrush and acacia shrubs.



Current condition of the stormwater detention pond with demarcation stakes in place along the eastern bank.



Current condition of the stormwater detention pond with stakes in place.



The stormwater detention pond along the internal road leading immediately north as seen towards the west.



Excavated soils and builders rubble stockpiles west of the contractors camp on site.



The condition of the northwestern section of the site, as seen towards the northwestern corner.

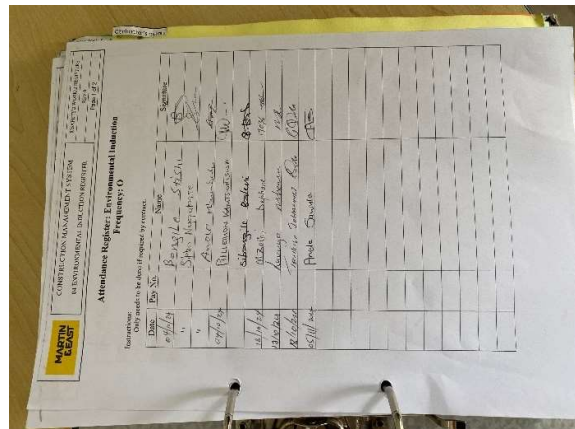


Condition of the completed internal road and kerbs as seen towards Sheffield Road in back of picture.

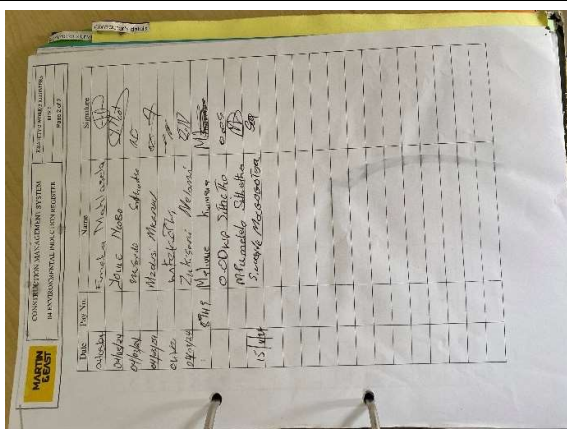
Environmental File On-Site



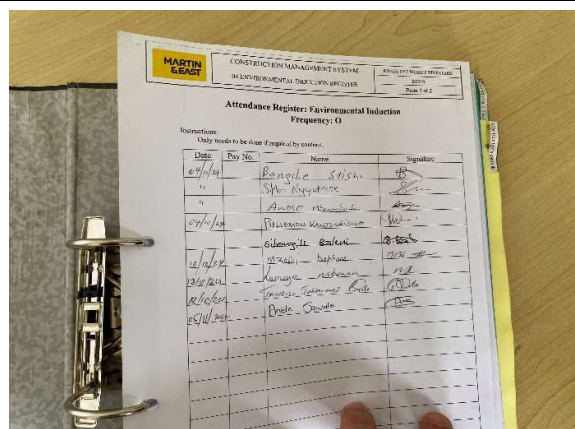
Environmental file available at the site office.



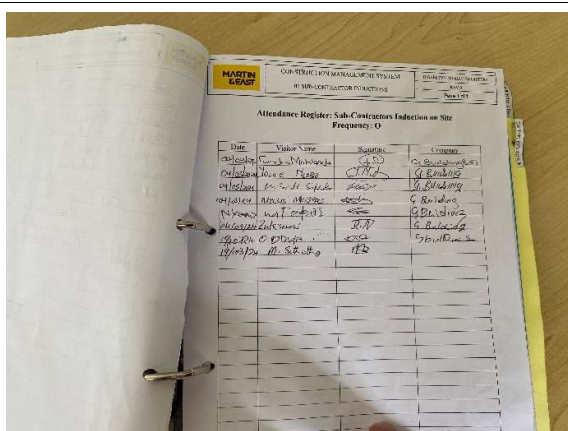
Attendance register.



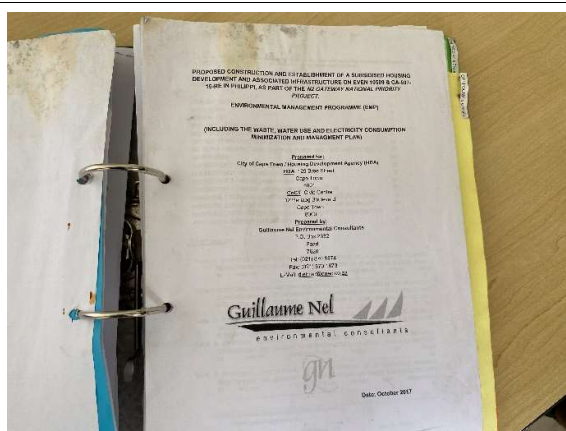
Environmental induction register.



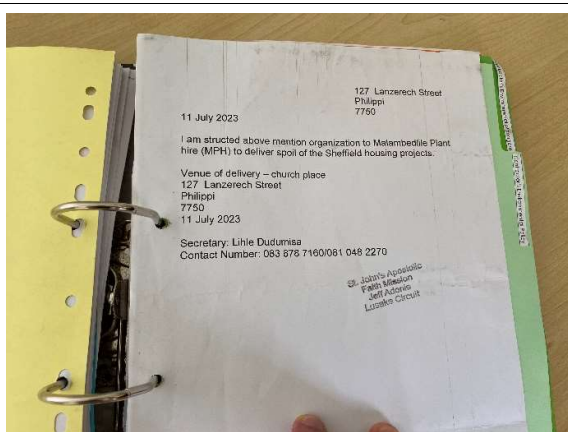
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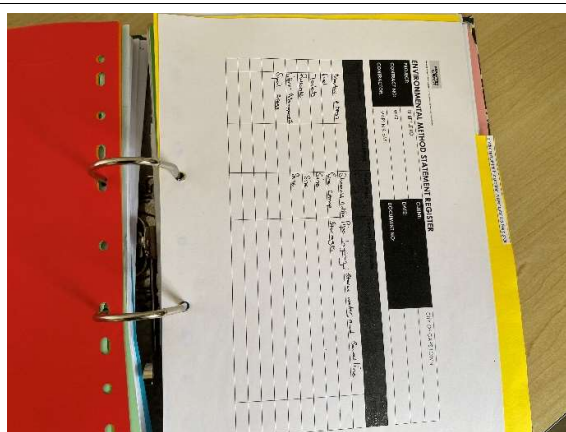
Environmental induction register.



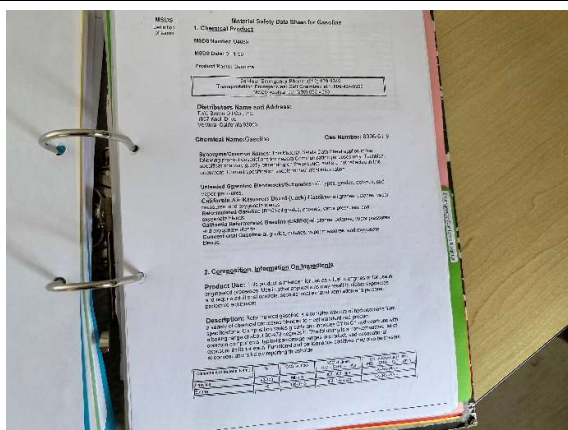
EMPr available within the environmental file.



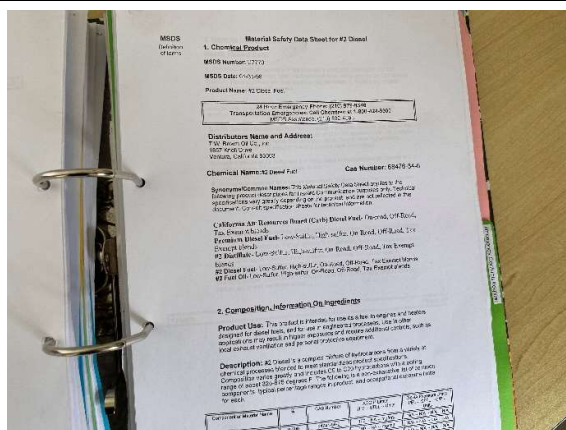
Location of spoil site confirmed.



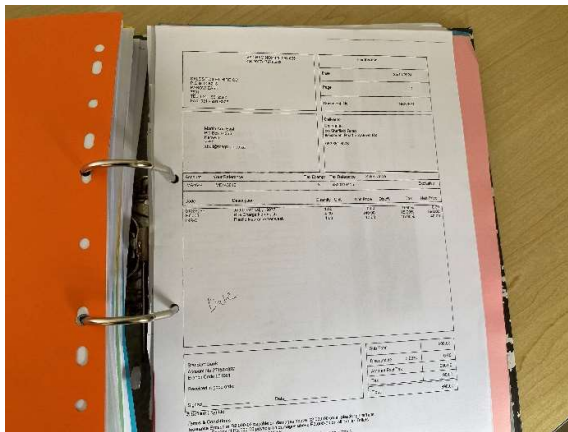
List of Method Statements available.



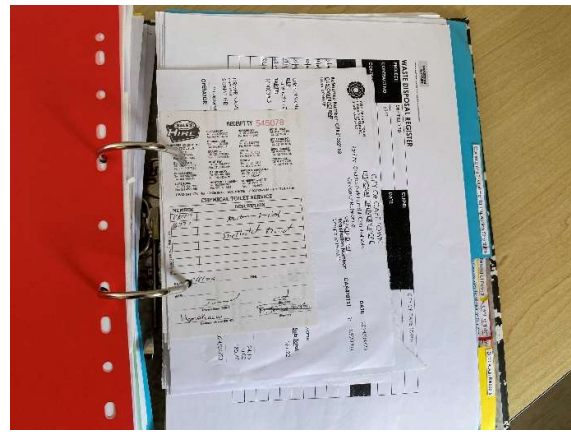
Material safety data sheet for gasoline.



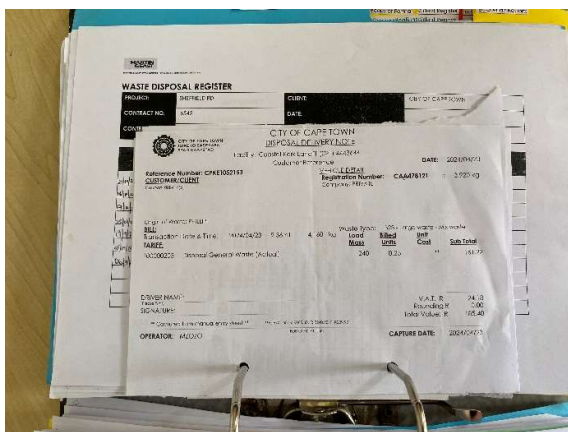
Material safety data sheet for diesel.



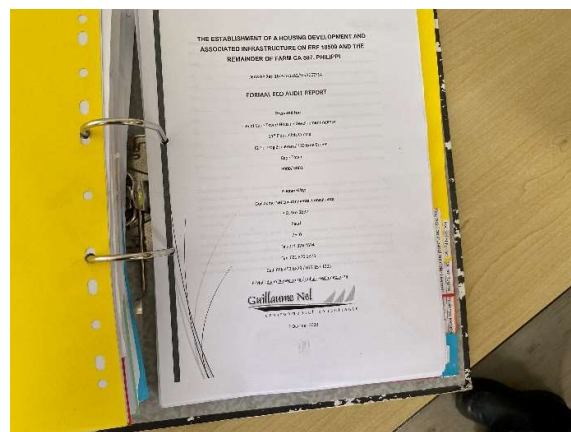
Confirmation of chemical toilet hire.



Proof of Waste disposal slips.



Proof of Waste disposal slips.



Formal ECO reports