

**PROPOSED ESTABLISHMENT OF A RESIDENTIAL DEVELOPMENT  
AND ASSOCIATED INFRASTRUCTURE ON PORTION 2 OF FARM  
GOEDEVERWACHTING NO. 870, REMAINDER OF FARM NO. 869,  
FARM NO. 1262, REMAINDER OF FARM NO. 866, REMAINDER OF  
FARM NO. 1054, AND PORTIONS 2 AND 3 OF FARM NO. 1054, SIR  
LOWRY'S PASS VILLAGE.**

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



DEA&DP REF: 16/3/3/1/A3/53/2005/22  
NEAS REF: WCP/EIA/0001040/2022

**Prepared for:**

**Mount View (Pty) Ltd.**

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KAPPEC

**27 February 2025**

## DETAILS OF THIS REPORT

|                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Status of this Report                                                                                                                                                                                                                                                                                                                         | <b>Final Regulation 34 External Compliance Audit Report</b>                                                                                                                                                                                                                                        |
| Date Submitted                                                                                                                                                                                                                                                                                                                                | 27 February 2025                                                                                                                                                                                                                                                                                   |
| Public Review Period                                                                                                                                                                                                                                                                                                                          | Not Applicable                                                                                                                                                                                                                                                                                     |
| Report Title                                                                                                                                                                                                                                                                                                                                  | Proposed Establishment of a Residential Development and Associated Infrastructure on Portion 2 of Farm Goedeverwachting No. 870, Remainder of Farm No. 869, Farm No. 1262, Remainder of Farm No. 866, Remainder of Farm No. 1054, and Portions 2 and 3 of Farm No. 1054, Sir Lowry's Pass Village. |
| Applicant                                                                                                                                                                                                                                                                                                                                     | <b>Mount View (Pty) Ltd.</b><br>Zomerlust Estate, Corner of Bergrivier Boulevard & Bergsig Avenue, Paarl, 7646<br>Mr. Johan du Plessis<br>(021) 872 0028<br><a href="mailto:johan@propinvest.co.za">johan@propinvest.co.za</a>                                                                     |
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| <br>The logo for KAPP Environmental Consultants features a stylized green leaf icon to the left of the word "KAPP" in large, bold, dark grey capital letters. Below "KAPP" is the text "ENVIRONMENTAL CONSULTANTS" in smaller, dark grey capital letters. |                                                                                                                                                                                                                                                                                                    |

## DISCLAIMER

This report has been prepared for Mount View (Pty) Ltd. 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)

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### Signature of the Principle Environmental Assessment Practitioner

Kapp Environmental Consultants (Pty) Ltd (KAPPEC)

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### Name of Company

27 February 2025

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### 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

|                    |                                             |
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| <b>Appendix A:</b> | Site Photographs                            |
| <b>Appendix B:</b> | Site Development Plan                       |
| <b>Appendix C:</b> | Copy of EA                                  |
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## INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed on behalf of Mount View Pty Ltd. (the Applicant) as the independent environmental 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).

An Environmental Authorisation (EA) was granted to Mount View Pty Ltd. on August 16, 2022 (DEA&DP EIA Ref: 16/3/3/1/A3/53/2005/22) in terms of The National Environmental Management Act, 1998 (Act 107 Of 1998) ("NEMA") and Environmental Impact Assessment (EIA) Regulations, 2014 (as Amended) for the Proposed Establishment of a Residential Development and Associated Infrastructure on Portion 2 of Farm Goedeverwachting No. 870, Remainder of Farm No. 869, Farm No. 1262, Remainder of Farm No. 866, Remainder of Farm No. 1054, and Portions 2 and 3 of Farm No. 1054, Sir Lowry's Pass Village.

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 (8 November 2024)
- Documentation audit
- Compilation of environmental audit report
- Submission of environmental audit report (21 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 aims to construct a modern residential community comprising 383 erven on a strategically located site. The residential complex will feature a clubhouse equipped with a deli/shop, coffee shop, restaurant, gym, and essential facilities such as a crèche, sales offices, board room, and a security control room. Designed with a commitment to green living, approximately 6.78 hectares (nearly 29% of the site) will be dedicated to green spaces, which will be either landscaped or rehabilitated to enhance the ecological value of the area.

The development is accessible from Old Sir Lowry's Pass Road, with the main entrance positioned approximately 160 meters west of High Riding Estate Street and 265 meters east of the access road to Farm 1262. An additional access point via the Farm 1262 entrance will be available for select residents. Furthermore, there is potential for a pedestrian sidewalk along Old Sir Lowry's Pass Road, enhancing accessibility from Tre Donne to the development's entrance.

A key environmental feature on-site is an unnamed tributary of the Sir Lowry's Pass River, alongside five channelled valley bottom (CVB) wetland fragments. The pre- and post-development 1:100-year floodlines have been modeled to ensure flood safety. The development layout places most structures above the post-development 1:100-year floodline, with only minimal structures situated below this line.

In line with the City of Cape Town (CoCT) Floodplain and River Corridor Management Policy, a conservation buffer has been implemented around the tributary and wetlands. While a minimum 10-meter buffer is recommended, a variable buffer ranging from 5 to 15 meters has been applied to accommodate site layout, ensuring an equivalent conservation area by expanding the buffer elsewhere as compensation. This conservation buffer approach is supported by Freshwater Ecological Network (FEN), which determined that the buffer's impact on the watercourse is low.

### Activities within the Conservation Buffer and 1:100-Year Floodline Area

The development incorporates several activities within proximity to the conservation buffer and 1:100-year floodline area, as outlined by Freshwater Ecological Network (FEN, 2021):

- **Rehabilitation of Previous Infill:** Unauthorised infill within the wetland area of the unnamed tributary will be removed, reshaped, and rehabilitated to restore natural water flow.
- **Floodline Adjustments:** The 1:100-year floodline southeast of Old Sir Lowry's Pass Road will be managed to accommodate portions of the development. This will include:
  - A 96-meter stormwater channel directing flow toward the culvert beneath the road,
  - Expansion of the existing culvert to a 2.4 m by 1 m portal,
  - A 50-meter flood berm downstream of the culvert to manage flow and erosion.

### Infrastructure and Road Network

The internal road network, designed to support low heavy vehicle traffic, will feature 6.3 m / 5.5 m wide brick-paved roads with formal curbs, open stormwater channels, and an underground pipe system. An internal road will cross the tributary at the northern boundary via a portal culvert with erosion control measures, including reno mattresses and riprap.

## **Stormwater Management**

Three new stormwater attenuation facilities will be situated above the 1:100-year floodline, complemented by an existing impoundment north of the main farmhouse. These facilities will manage stormwater by attenuating runoff and enhancing infiltration, designed to handle a 1:50-year flood. Gabion weirs and open channels will control stormwater discharge into the tributary, with discharge points above the 1:50-year floodline to minimize erosion.

It is proposed that the flood lines be altered in one area by diverting water back to the watercourse by increasing the size of the existing stormwater pipe culvert through Old Sir Lowry's Pass Road and the addition of stormwater channel / cut-off berms upstream of the lower development portion (KLS, 2021).

The following measures are proposed to improve the water conveyance capacity in the vicinity of Old Sir Lowry's Pass Road:

- Natural channel along the upstream side of the road to channel flow to the pipe culvert crossing Old Sir Lowry's Pass Road.
- Enlargement of the existing pipe culvert to a 2.4 m x 1 m portal culvert.
- A 1 m high berm just downstream of the culvert which extends parallel to the road in a south-easterly direction for approximately 50 metres.

## **Watercourse-Adjacent Infrastructure and Private Erven**

Several portions of private erven and compacted walkways are situated within the conservation buffer but above the 1:100-year floodline. To protect these areas, a 300 mm stub wall is proposed along the lawn area adjacent to private erven, limiting alien invasive plant (AIP) encroachment into the conservation buffer.

## **Wastewater Treatment Plants (WWTPs)**

Two WWTPs (A and B) are proposed:

- **WWTP A:** Situated above the 1:100-year floodline in the lower development's western corner, with treated effluent used for irrigation.
- **WWTP B:** Located in the upper development area, upgradient of Old Sir Lowry's Pass Road, providing wastewater management if the Macassar WWTW upgrade is delayed.

## **Bulk Services**

Bulk services infrastructure will cross the tributary, as detailed in the Civil Services Engineering Report, with a pump station adjacent to WWTP A for efficient irrigation supply. The development's comprehensive environmental and infrastructure strategy is designed to balance residential needs with sustainable practices, ensuring long-term ecological and community benefits.

No formal buildings will encroach upon the conservation buffer, allowing focused rehabilitation efforts to restore and maintain ecological health. A comprehensive Watercourse Rehabilitation Plan, developed by FEN, and an additional Rehabilitation Plan by Christoff Dippenaar of Guillaume Nel Environmental Consultants (GNEC), will significantly enhance the watercourse's ecological functioning, bolstering the integrity of the surrounding environment.

## LISTED ACTIVITIES

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

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

#### **Activity 9:**

##### Activity Description:

The development of infrastructure exceeding 1000 metres in length for the bulk transportation of water 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 infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or

(b) where such development will occur within an urban area”.

**The proposed site is located outside an urban area and infrastructure exceeding 1000m in length for the bulk transportation of storm water will be established.**

#### **Activity 12:**

##### Activity Description:

The development of—

(i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or

(ii) infrastructure or structures with a physical footprint of 100 square metres or more;

where such development occurs—

(a) within a watercourse;

(b) in front of a development setback; or

(c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse;

excluding—

(aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;

(bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;

(cc) activities listed in Activity 14 in Listing Notice 2 of 2014 or Activity 14 in Listing Notice 3 of 2014, in which case that activity applies;

- (dd) where such development occurs within an urban area;
- (ee) where such development occurs within existing roads, road reserves or railway line reserves;
- or
- (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.

**The proposed site is located outside an urban area and infrastructure/structures of more than 100m<sup>2</sup> will be constructed within 32m from the edge of a watercourse.**

**Activity 19:**

Activity Description:

The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse;

but excluding where such infilling, depositing, dredging, excavation, removal or moving—

- (a) will occur behind a development setback;
- (b) is for maintenance purposes undertaken in accordance with a maintenance management plan;
- (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;
- (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or
- (e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.

**The development proposal entails the removing or moving, dredging, excavation, infilling or depositing of material of more than 10m<sup>3</sup> from the watercourse.**

**Activity 27:**

Activity Description:

The clearance of an area of 1 hectares 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.

**More than 1ha of indigenous vegetation will be cleared.**

**Activity Number: 28:**

Activity Description:

Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development:

- (i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares;  
or
- (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare;  
excluding where such land has already been developed for residential, mixed, retail, commercial,  
industrial or institutional purposes.

**The proposed site was zoned for agricultural use on or after 01 April 1998 and is located outside an urban area.**

**Listing Notice 3 of the EIA Regulations, 2014 (as amended):**

**Activity Number: 4:**

Activity Description:

The development of a road wider than 4 metres with a reserve less than 13,5 metres.

i. Western Cape

i. Areas zoned for use as public open space or equivalent zoning;

ii. Areas outside urban areas;

(aa) Areas containing indigenous vegetation;

(bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or

iii. Inside urban areas:

(aa) Areas zoned for conservation use; or

(bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.

**Internal roads (wider than 4m) will be constructed on areas containing indigenous vegetation.**

## **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 report on –

- the level of compliance with the conditions of the environmental authorisation and the EMPr, and where applicable, the closure plan; and
- 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;
- identify and assess any new impacts and risks as a result of undertaking the activity;
- evaluate the effectiveness of the EMPr, and where applicable, the closure plan; and
- identify shortcomings in the EMPr, and where applicable the closure plan, and
- 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 – details of the –

- independent person who prepared the environmental audit report; and
- expertise of the independent person that compiled the environmental audit report;
- a declaration that the independent auditor is independent in a for as may be specified by the competent authority;
- an indication of the scope of, and purpose for which, the environmental audit report was prepared;
- a description of the methodology adopted in preparing the environmental audit report;
- an indication of the ability of the EMPr, and where applicable, the closure plan to –
- sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis;
- sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and
- ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan;
- a description of any assumptions made, and any uncertainties or gaps in knowledge;
- a description of any consultation process that was undertaken during the course of carrying out the environmental audit report;

- a summary and copies of any comments that were received during any consultation process; and
- any other information requested by the competent authority.

### **Additional Content of Environmental Audit Reports**

According to the issued EA, the following should be addressed in addition to the minimum requirements as set out above.

The Environmental Audit Report(s), must –

- provide verifiable findings, in a structured and systematic manner, on–
- the level of compliance with the conditions of the Environmental Authorisation and the EMPr and whether this is sufficient or not; and
- the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr and highlight whether this is sufficient or not;
- identify and assess any new impacts and risks as a result of undertaking the activity;
- evaluate the effectiveness of the EMPr;
- identify shortcomings in the EMPr;
- identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;
- indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation.
- include a photographic record of the site applicable to the audit; and
- be informed by the ECO reports.



Masterplan

Revision N-13 | 17.09.2021 | 1:3000 (@A3)



MOUNT VIEW

URBANSTUDIO  
architects & urban designers

FIGURE 1: SITE DEVELOPMENT PLAN

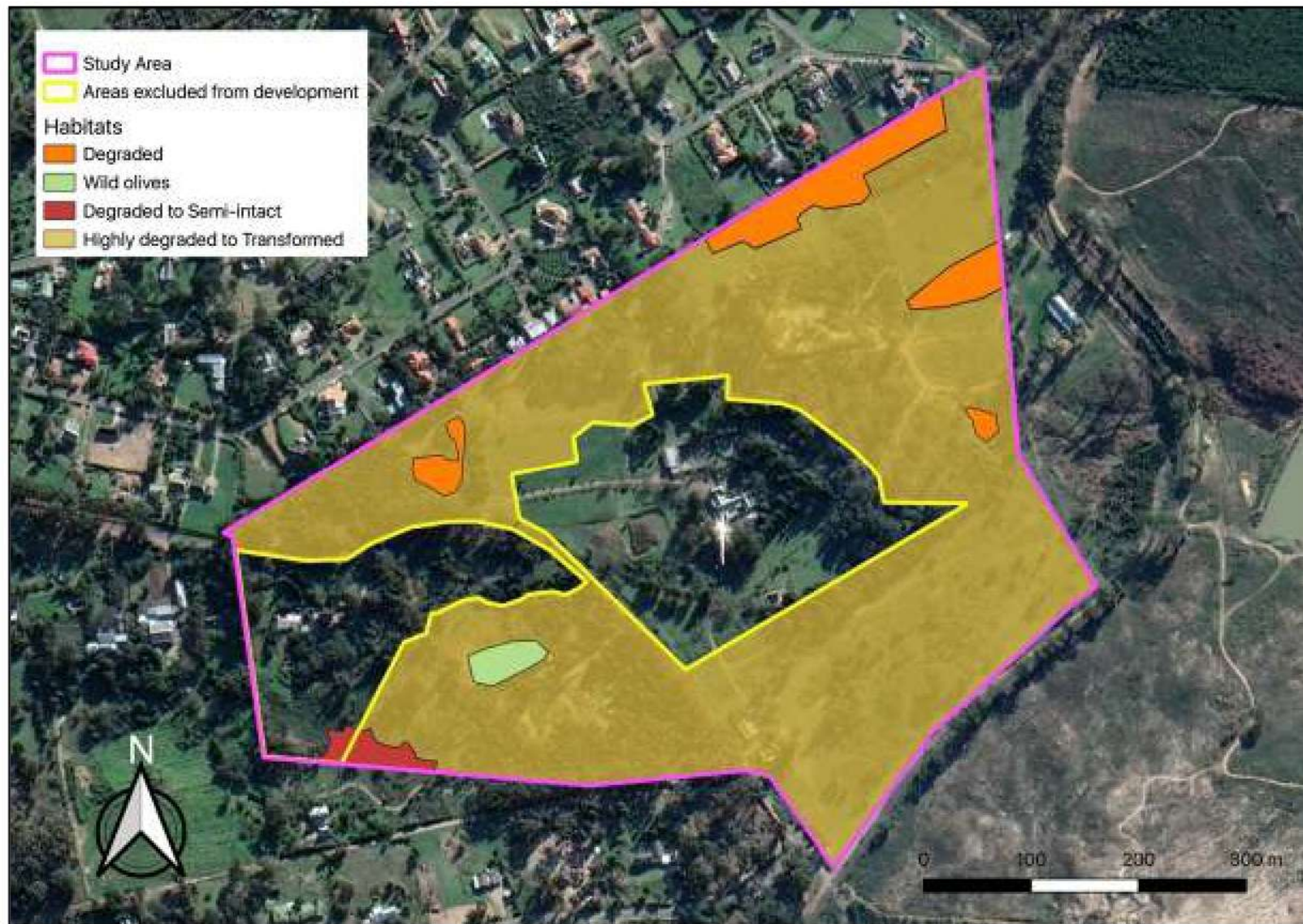


FIGURE 2: BOTANICAL SENSITIVITIES MAP

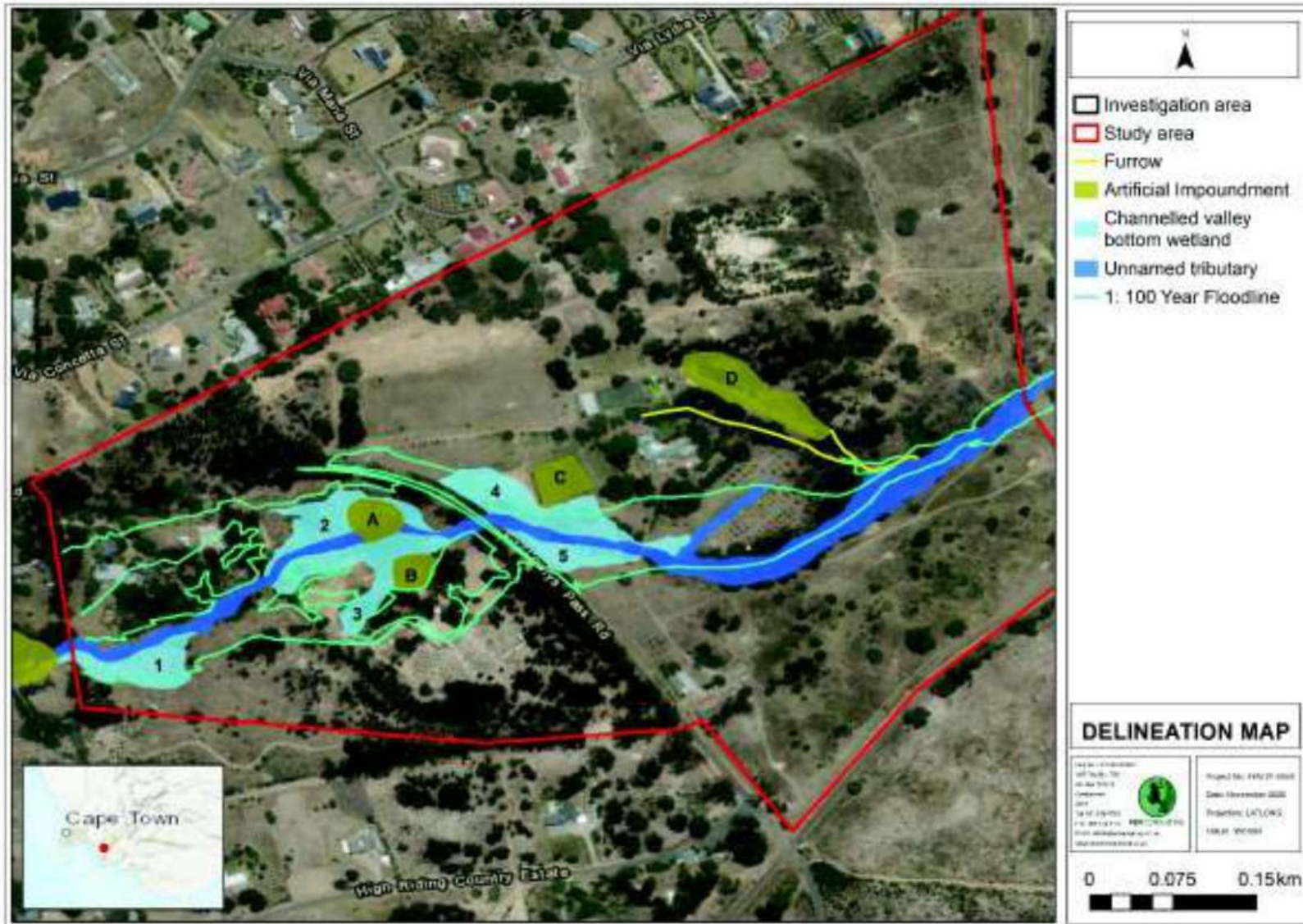


FIGURE 3: FRESHWATER SENSITIVITIES MAP

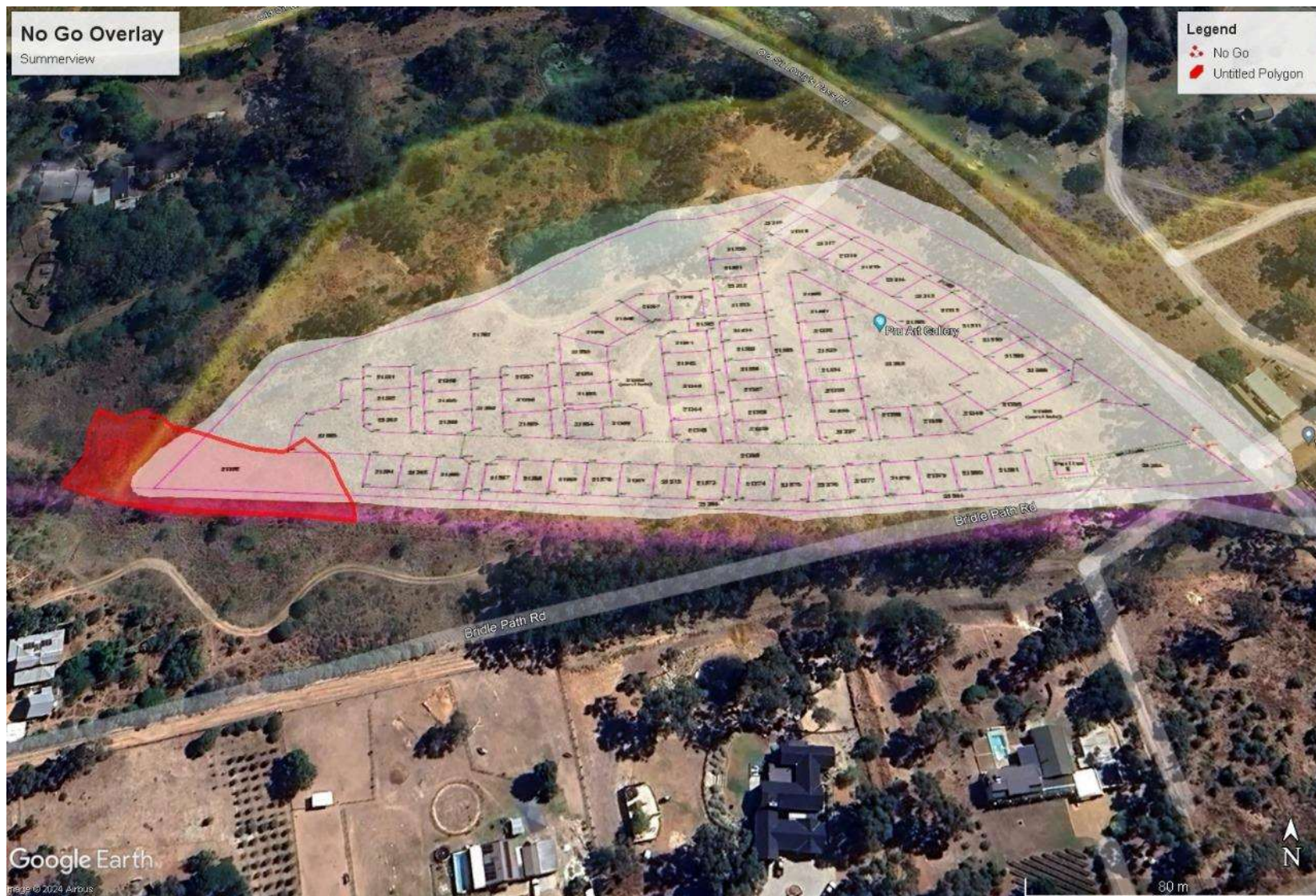


FIGURE 4: MAP DEPICTING THE NO-GO AREA

## 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, described in the BAR dated 04 May 2022 on the site as described in Section C above.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | The preferred alternative, as authorised, is being implemented on-site.                                                                                                                                                                                  |
| 2.  | Authorisation of the activities is subject to compliance with the conditions set out in this Environmental Authorisation. The holder must ensure 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.                                                                                                                                                                                                                                                                                                                                                                                                               | The EA is implemented in accordance with the approved EMPr and the holder remains responsible throughout. The contractor and all employees have been made aware of the conditions set out in the EA and EMPr as part of the induction training sessions. |
| 3.  | <p>The holder must commence with, and conclude, the listed activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority.</p> <p>This Environmental Authorisation is granted for–</p> <p>(a) A period of five (5) years, from the date of issue, during which period the holder must commence with the authorised listed activities; and</p> <p>(b) A period of fifteen (15) years, from the date the holder commenced with an authorised listed activity, during which period the authorised listed activities must be concluded.</p> | A letter of commencement for site preparation was sent to DEA&DP on the 12 <sup>th</sup> of February 2024. According to the supplied ECO reports, civil service installation and site clearance commenced in July 2024.                                  |
| 4.  | The activities that have been authorised may only be carried out at the site described in Section C above in terms of the approved                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | All authorised activities are being carried out in terms of the EMPr and the RMMP.                                                                                                                                                                       |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                     |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | Environmental Management Programme (“EMPr”) and the River Maintenance Management Plan (“RMMP”).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                     |
| 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 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.                                                                                                                                                                                                                                                                                                                                                                                                                                    | Noted, no changes or deviations from the scope of the project description have occurred since the EA have been obtained/approved and construction has commenced.                    |
| 6. | <p>The holder of the authorisation must in writing, within 14 (fourteen) calendar days of the date of this decision –</p> <p>6.1.3 the date of the decision; and</p> <p>6.1 notify all registered interested and affected parties (“I&amp;APs”) of –</p> <p>6.1.1 the outcome of the application;</p> <p>6.1.2 the reasons for the decision;</p> <p>6.1.4 the date of issue of the decision;</p> <p>6.2 draw the attention of all registered I&amp;APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended);</p> <p>6.3 draw the attention of all registered I&amp;APs to the manner in which they may access the decision; and</p> <p>6.4 provide the registered I&amp;APs with:</p> <p>6.4.1 the name of the holder (entity) of this Environmental Authorisation,</p> <p>6.4.2 name of the responsible person for this Environmental Authorisation,</p> <p>6.4.3 postal address of the holder,</p> | The EA was issued on the 16 <sup>th</sup> of August 2022, and all registered I&APs were notified of the EA on the 18 <sup>th</sup> of August, within 2 days of the EA being issued. |

|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                              |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            | <p>6.4.4 telephonic and fax details of the holder,</p> <p>6.4.5 e-mail address, if any;</p> <p>6.4.6 the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&amp;APs in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).</p>                                                                                                                       |                                                                                                                                                                                                                                                                                                                                              |
| <b>7.</b>  | The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered I&APs of this decision.                                                                                                                                                                                                                                                                                                          | The I&APs were notified on the 18 <sup>th</sup> of August 2022, and the letter of commencement for site preparation was sent to DEA&DP on the 12 <sup>th</sup> of February 2024.                                                                                                                                                             |
| <b>8.</b>  | In the event that an appeal is lodged with the Appeal Administrator, the effect of this Environmental Authorisation is suspended until such time as the appeal is decided. In the instance where an appeal is lodged the holder may not commence with the activity, including site preparation, until such time as the appeal has been finalised and the holder is authorised to do so.                                                                                                    | No appeals were lodged during the appeal period.                                                                                                                                                                                                                                                                                             |
| <b>9.</b>  | <p>A minimum of 7 (seven) calendar days' notice, in writing, must be given to the competent authority before commencement of construction activities. Commencement for the purpose of this condition includes site preparation.</p> <p>9.1 The notice must make clear reference to the site details and EIA Reference number given above.</p> <p>9.2 The notice must also include proof of compliance with the following conditions described herein:<br/>Conditions: 6, 7, 14 and 21.</p> | <p>A notification of commencement was sent to DEA&amp;DP on the 12<sup>th</sup> of February 2024 and made clear reference to the site details and EIA Reference, it also included proof/comments of compliance with conditions 6, 7, 14 and 21.</p> <p>Please refer to proof of compliance with these conditions included as Appendix H.</p> |
| <b>10.</b> | The draft EMPr dated 04 May 2022 (as compiled by Guillaume Nel Environmental Consultants); the draft RMMP dated 24 February 2022 (as compiled by Mr. Christoff Dippenaar of Guillaume Nel Environmental Consultants); the Watercourse and Wetland                                                                                                                                                                                                                                          | The EMPr, RMMP, the WWRP and Rehabilitation Plan is implemented on site.                                                                                                                                                                                                                                                                     |

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|            | Rehabilitation Plan dated March 2021 (as compiled by Freshwater Ecologist Network Consulting (Pty) Ltd.); and the Rehabilitation Plan November 2022, amended March 2021 (as compiled by Mr. Christoff Dippenaar of Guillaume Nel Environmental Consultants) are hereby approved and must be implemented.                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                    |
| <b>11.</b> | An application for amendment to the EMPr must be submitted to the competent authority in terms of Chapter 5 of the EIA Regulations, 2014 (as amended) if any amendments are to be made to the outcomes of the EMPr, and these may only be implemented once the amended EMPr has been authorised by the competent authority.                                                                                                                                                                                                                                                                                                      | No amendments to the EMPr have been done to date.                                                                                                                                                                                  |
| <b>12.</b> | The EMPr, including the RMMP, Watercourse and Wetland Rehabilitation Plan and Rehabilitation Plan must be included in all contract documentation for all phases of implementation.                                                                                                                                                                                                                                                                                                                                                                                                                                               | All environmental documents have been included in an environmental file and are accessible and present on-site.                                                                                                                    |
| <b>13.</b> | A copy of the Environmental Authorisation and the EMPr 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 EMPr 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 EMPr must also be made available for inspection by any employee or agent of the applicant who works or undertakes work at the site. | All environmental documents have been included in an environmental file and are accessible and present on-site.                                                                                                                    |
| <b>14.</b> | The holder must appoint a suitably experienced Environment Control Officer ("ECO"), for the duration of the construction phase to ensure compliance with the provisions of the EMPr and the conditions contained in this Environmental Authorisation.<br>The ECO must–                                                                                                                                                                                                                                                                                                                                                           | Nica Kotze from Guillaume Nel Environmental Consultants (GNEC) has been appointed as the Environmental Control Officer (ECO) to conduct audits on compliance in terms of the EA and the Environmental Management Programme (EMPr). |

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|            | <p>14.1 be appointed prior to commencement of any construction activities commencing;</p> <p>14.2 ensure compliance with the EMPr and the conditions contained herein;</p> <p>14.3 keep record of all activities on site; problems identified; transgressions noted, and a task schedule of tasks undertaken by the ECO;</p> <p>14.4 remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed;</p> <p>14.5 provide the competent authority with copies of the ECO reports within 30 days of the project being finalised; and</p> <p>14.6 conduct two weekly site inspections during the construction phase.</p> |                                                                                                                                                                                                                                                                                                                                                                    |
| <b>15.</b> | <p>The holder must, for the period during which the Environmental Authorisation and EMPr remain valid -</p> <p>15.1 ensure that the compliance with the conditions of the Environmental Authorisation and the EMPr is audited;</p> <p>15.2 submit an environmental audit report four (4) months after commencement of the construction phase to the relevant competent authority;</p> <p>15.3 submit an environmental audit report six (6) months after completion of the construction phase to the relevant competent authority; and</p> <p>15.4 submit an environmental audit report every five (5) years while the Environmental Authorisation remains valid.</p>               | <p>Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed on behalf of Mount View Pty Ltd. (the Applicant) as the independent environmental 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).</p> |
| <b>16.</b> | <p>The environmental audit reports must be prepared by an independent person with expertise and must address the objectives and contain all the information set out in Appendix 7 of the EIA Regulations, 2014</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed on behalf of Mount View Pty Ltd. (the Applicant) as the independent environmental practitioners to undertake an</p>                                                                                                                                                                       |

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|            | <p>(as amended).</p> <p>In addition to the above, the environmental audit report, must -</p> <p>16.1 provide verifiable findings, in a structured and systematic manner, on—</p> <p>(a) the level of compliance with the conditions of the Environmental Authorisation and the EMPr and whether this is sufficient or not; and</p> <p>Noted(b) the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr and highlight whether this is sufficient or not;</p> <p>16.2 identify and assess any new impacts and risks as a result of undertaking the activity;</p> <p>16.3 evaluate the effectiveness of the EMPr;</p> <p>16.4 identify shortcomings in the EMPr;</p> <p>16.5 identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;</p> <p>16.6 indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;</p> <p>16.7 include a photographic record of the site applicable to the audit; and</p> <p>16.8 be informed by the ECO reports.</p> | <p>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).</p> <p>This report will address conditions 16.2 – 16.8.</p> <p>16.6. Construction commenced with site preparation in February 2024, and according to the supplied ECO reports civil service installation and site clearance commenced in July 2024. During the October ECO site visit the contractor was busy with stormwater and sewer installations which included piping and the installation of manholes.</p> <p>16.7. Please refer to Appendix A.</p> <p>16.8. Evidence as seen in the EA and EMPr compliance tables.</p> |
| <b>17.</b> | The holder must, within 7 days of the submission of the environmental                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | The I&AP's will be notified within 7 calendar days after the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|     | audit report to the competent authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and, where the holder has such a facility, be placed on a publicly accessible website.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | submission of the audit report to the Competent Authority.                                                                                |
| 18. | Surface or ground water must not be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | No surface or groundwater was polluted on site during the visit. All necessary demarcations were in place.                                |
| 19. | 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 waste disposal facility licensed in terms of the applicable legislation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | The holder is to take note of this condition. Disposal slips should be sent to the ECO. No proof of disposal slips has yet been received. |
| 20. | <p>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. Heritage remains may only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant Heritage Resources Authority.</p> <p>Heritage remains include: meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; shipwrecks; and/or graves or unmarked human</p> | No heritage remains has been found to date.                                                                                               |

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|     | <p>burials including grave goods and/or associated burial material.</p> <p>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.</p> <p>20.1 Within six (6) months of approval of the proposed development, the owner of the proposed "Remainder Goede Verwachting Homestead Erf" must submit a Conservation Management Plan for the homestead and its context to Heritage Western Cape for approval.</p> <p>20.2 The Conservation Management Plan must be prepared by a suitably qualified heritage practitioner and must include, inter alia, the requirement that trenching activity within 50m of the homestead area must be checked by an archaeologist.</p> <p>20.3 Prior to any work in the vernacular cottage precinct, the proposed alterations (including a maintenance plan) for all structures to be retained in the precinct, must be submitted to Heritage Western Cape for approval and must be accompanied by more detailed proposals for the precinct, including an appropriate maintenance and refurbishment plan, and plans for landscaping, boundary treatment, lighting and signage.</p> | <p>Protocols will be followed should any heritage remains be found.</p> <p>A Heritage Management Plan was compiled along with the necessary associated drawings by Stuart Hermansen on 29 November 2023, revised on 24 January 2024 and approved by HWC with a RoD on 30 January 2024.</p> <p>Noted.</p> <p>No such work in the vernacular cottage precinct has occurred as of yet.</p> |
| 21. | <p>The area in the southwestern corner where the <i>Monsonia speciosa</i> species has been identified must be demarcated before any construction activities commence. This area must be treated as a no-go area and may not be developed.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>The area in the southwestern corner of the site has been clearly demarcated on site with painted droppers and string and will be treated as a no-go area.</p>                                                                                                                                                                                                                        |

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| <b>22.</b> | The holder of the Environmental Authorisation must, at all times, ensure that the activities comply with the Noise Regulations in terms of the relevant legislation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | The holder to please take note of this condition.                              |
| <b>23.</b> | <p>Water saving mechanisms and/or water recycling systems must be installed in order to reduce water consumption that include inter alia, the following:</p> <p>23.1 Dual-flush toilet systems.</p> <p>23.2 All taps must be fitted with water saving devices (i.e., tap aerators, flow restrictors and low flow shower heads).</p> <p>23.3 Water-wise landscaping must be established.</p>                                                                                                                                                                                                                                                | Not auditable at this stage. The holder to please take note of this condition  |
| <b>24.</b> | <p>The development must incorporate energy/electricity saving measures, which include inter alia, the following:</p> <p>24.1 Use of energy efficient lamps and light fittings. Low energy bulbs must be installed, and replacement bulbs must also be of the low energy consumption type.</p> <p>24.2 Street lighting must be kept to a minimum and down lighting must be used to minimise light impacts. Streetlights must be switched off during the day.</p> <p>24.3 All geysers must be covered with geyser “blankets”.</p> <p>24.4 The installation of solar water heaters and solar panels must be considered for all buildings.</p> | Not auditable at this stage. The holder to please take note of this condition. |

## SITE AUDIT FINDINGS

A detailed walkthrough site visit was conducted on the 8<sup>th</sup> of November 2024 to assess the progress of the ongoing construction activities in line with Condition 15 of the environmental authorization. The auditor was accompanied on site by the contractor's representatives to assist in providing additional information to the works on site. The contractors site camp is located just west of the current entrance to the site which is located off Old Sir Lowry's Pass Road. 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.

Demarcations are in place across the site in line with the requirements of the EMPr. The site boundary has been demarcated with 1.8m ClearVu fencing and the botanical no-go area along the southwestern corner of the site has been demarcated with painted droppers and string. The dam area located in the northeastern corner of the site has also been demarcated with orange netting and painted droppers. Furthermore, the wild olive grove towards the centre of the site has also been retained.

At the time of audit, the construction of bulk services was underway. The contractor noted the site contains subsurface rock which required the chemical breaking of the rock prior to the installation of the service pipelines. The services installed at the time of audit included potable water, and sewer pipelines. No roads and stormwater infrastructure has commenced.

Some topsoil was noted to be stockpiled along the eastern section of the site. It should be ensured that the topsoil and other subsoils are clearly separated and demarcated as such. It was furthermore noted that some of the lesser quality soils were sieved on site and also utilized as bedding sand. All topsoil should be retained for future rehabilitation purposes. Additional stockpiles of excavated rock and subsoils were also noted on site.

No dust generation was noted at the time of audit, although it is known that wind in this valley is at times significant. The contractor should consider covering stockpiles which are not in use and could generate dust where feasible. Material and rubble stockpiles which are not to be reused on site must be timeously removed from site.

The material laydown area adjacent to these stockpiles in the eastern portion of the site contains all the future stormwater pipes, water and sewer pipelines as well as brick pallets. This is deemed an appropriate location for these stockpiles.

The Old Sir Lowry's Pass Road was clean and did not contain any sediment from the site. Provision has been made for litter and packaging waste near the contractors' camp within a lockable container. This is deemed appropriate as it prevents litter and plastics from being blown around. Bins for litter are present adjacent to the contractor's office. Skips must be available on site once rubble is generated. Cement batching was not active at the time of audit and no cement remains were noted on site.

## ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

**TABLE 3: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE**

| No.       | EMP REQUIREMENT                                                                                                                                                                                                                                                                                                                                                                                                                          | COMPLIANCE FINDING                                                                                                                                                                                                                                                                                                                                                                                                      |
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| <b>1.</b> | <b>Site Demarcation and No-Go/Sensitive Areas</b>                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 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.                                                                                                                                                                                                                 | Construction commenced in July 2024. The construction footprint has been demarcated with droppers prior to commencement.                                                                                                                                                                                                                                                                                                |
| 1.2       | The watercourse area should be demarcated before construction activities commence. Activities within the watercourse area should only be allowed during construction taking place in the watercourse and/or rehabilitation of the watercourse. The development footprint in this area should be kept to a minimum.                                                                                                                       | The watercourse/wetland area has been successfully demarcated with ClearVu fencing. The dam has been temporarily demarcated with orange netting. Currently, sewer and stormwater systems, along with manhole installations, are being constructed near dam's boundary. No unauthorized encroachment was identified during the audit, although it was noted that groundwater enters the excavations adjacent to the dam. |
| 1.3       | It is recommended that the variable conservation buffer be utilised as a conservation buffer from the delineated edge of the watercourses. This area should be demarcated a no-go area and no unauthorised activities are allowed within the delineated extent of the watercourses. (If a more permanent fencing is desired, a pole and electric wire fence is considered suitable as this will still allow movement of faunal species). | The watercourse/wetland area has been successfully demarcated with ClearVu fencing. The area is designated as a no-go zone, with no construction activities or material stockpiles observed near the watercourse's edge or within the variable conservation buffer area.                                                                                                                                                |
| 1.4       | Stockpiled topsoil should be demarcated with danger tape and seen as no-go areas.                                                                                                                                                                                                                                                                                                                                                        | Although topsoil stockpiles were noted on-site, these were not sufficiently separated nor demarcated as such on site.                                                                                                                                                                                                                                                                                                   |
| 1.5       | These No-go areas must be <b>demarcated with fencing / warning tape</b> and signs before any construction activities commence. The                                                                                                                                                                                                                                                                                                       | The southwestern corner of the site, watercourse area and dam have been successfully demarcated. Prior to construction, the                                                                                                                                                                                                                                                                                             |

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|           | EO and ECO must be on site in order to make sure the correct areas are fully demarcated.                                                                                                                                                                        | southwestern corner of the site and the watercourse were demarcated, the dam was demarcated prior to this external site visit.                                                                                                                                                                                                                                            |
| <b>2.</b> | <b>Flora</b>                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                           |
| 2.1       | Prior to commencement of any development activities, the area where the <i>Monsonia speciosa</i> plant species have been identified should be demarcated as a no-go area.                                                                                       | According to the ECO report and November site audit, the southwestern corner of the site containing the <i>Monsonia speciosa</i> plant species was successfully demarcated prior to commencement with a more permanent wire fencing.                                                                                                                                      |
| 2.2       | Appropriate fencing and signage should be placed around the no-go area restricting access to the area.                                                                                                                                                          | The southwestern corner of the site containing the <i>Monsonia speciosa</i> plant species was successfully demarcated prior to commencement with a more permanent wire fencing. No specific signage was noted during the site audit.                                                                                                                                      |
| 2.3       | The implementation of the rehabilitation plan compiled by GNEC is imperative.                                                                                                                                                                                   | Noted, rehabilitation of the dam area will commence once the civil works in the immediate vicinity have been completed and at the appropriate time of year. Furthermore, a search and rescue of the southwestern corner has been conducted, and an additional search and rescue will be conducted in the near future.                                                     |
| 2.4       | Once construction is complete, rehabilitation of the watercourse must be undertaken in order to restore the aesthetic & ecological value of the area. Active re-vegetation must take place with locally indigenous vegetation under the supervision of the ECO. | Noted, rehabilitation of the dam area will commence once the civil works in the immediate vicinity have been completed and at the appropriate time of year. The Rehabilitation Plan, River Maintenance Management Plan and Watercourse Rehabilitation and Management Plan will be implemented by GNEC.                                                                    |
| 2.5       | According to the Conservation of Agricultural Resources Act, 1983 (CARA) and the National Environmental Management: Biodiversity Act, 2004 (NEMBA) every landowner has the responsibility to control alien invasive plants on their property.                   | Noted, no invasive alien plants other than the mature Blue Gum trees on site were observed within the construction area during the site audit. Several of these trees in the construction footprint have been felled although it is anticipated that several along the boundary lines will be retained to act as windbreaks and visual barriers to the surrounding areas. |

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| <b>3.</b> | <b>Stockpiles</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | All material stockpiles are within the designated laydown area towards the eastern section of the site, or adjacent to the trenches which will be backfilled after civil service installation.                                                                                                         |
| 3.1       | All stockpiled material must be easily accessible on site without any environmental damage of the surrounding properties.                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                        |
| 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. | Stockpiles of excavated rock, subsoils and some builders sand were noted on site. The contractor should consider covering stockpiles which are not in use and could generate dust where feasible. Material and rubble stockpiles which will not be reused on site must be timeously removed from site. |
| 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.                                                                                                                                                                                                                                                                                                                                     | Noted and complied with, all stockpiles were placed within the temporary material laydown area towards the east of the site, as well as windrowed along the excavations on site. This is deemed an appropriate location for these stockpiles and is not in proximity to any watercourses.              |
| 3.4       | Stockpiles may not exceed 2 metres in height and their footprint should be kept to a minimum.                                                                                                                                                                                                                                                                                                                                                                                                       | During the audit no stockpiles exceeded the 2m height restriction.                                                                                                                                                                                                                                     |
| 3.5       | Stockpiling of removed materials may only be temporary and should be disposed of at a registered waste disposal facility.                                                                                                                                                                                                                                                                                                                                                                           | The ECO has requested that the contractor please forward all disposal slips. Tree felling (cleared vegetation) remains were also noted during the site audit.                                                                                                                                          |
| 3.6       | Stormwater runoff from the stockpile sites and other related areas must be directed into the stormwater system.                                                                                                                                                                                                                                                                                                                                                                                     | Noted, no formal stormwater systems have been constructed at the time of audit. Stormwater currently drains into the undisturbed areas and into the excavated ditches on site.                                                                                                                         |
| 3.7       | Stockpiles are to be stabilised if signs of erosion are visible.                                                                                                                                                                                                                                                                                                                                                                                                                                    | No erosion was visible during the site audit, and this was also confirmed by the ECO reports provided.                                                                                                                                                                                                 |
| 3.8       | Stockpiles must be established outside of the delineated watercourses and the applicable variable buffer.                                                                                                                                                                                                                                                                                                                                                                                           | Noted and complied with.                                                                                                                                                                                                                                                                               |

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| <b>4.</b> | <b>Topsoil Management</b>                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                           |
| 4.1       | All topsoil must be removed prior to the commencement of any development activities. Topsoil must be stockpiled. Stockpiled topsoil must be regarded as no-go areas.                                                                                                                                                                                                                              | Some topsoil was noted to be stockpiled along the eastern section of the site. It should be ensured that the topsoil and other subsoils are clearly separated and demarcated as such. It was furthermore noted that some of the lesser quality soils were sieved on site and utilized as bedding sand. All topsoil should be retained for future rehabilitation purposes. |
| 4.2       | Stockpiled topsoil must be monitored for invasive exotic vegetation growth. Contractors must remediate as and when required in consultation with the EO, RE and ECO.                                                                                                                                                                                                                              | No invasive alien vegetation was observed on any of the stockpiles.                                                                                                                                                                                                                                                                                                       |
| 4.3       | No plant, workforce or any construction related activities may be allowed onto the windrowed topsoil.                                                                                                                                                                                                                                                                                             | Noted, all construction activities occurred away from the topsoil stockpiles.                                                                                                                                                                                                                                                                                             |
| 4.4       | All topsoil must be replaced during the rehabilitation phase to ensure the re-establishment of natural vegetation.                                                                                                                                                                                                                                                                                | Noted, rehabilitation will most probably occur in phases after all civil services and construction activities have been completed. All topsoil should be retained for future rehabilitation purposes.                                                                                                                                                                     |
| 4.5       | Handling of the topsoil should be minimised and should therefore only be handled before construction (to be windrowed) and after construction (topsoil to be replaced).                                                                                                                                                                                                                           | This is noted, the <u>contractor to take cognizance.</u>                                                                                                                                                                                                                                                                                                                  |
| <b>5.</b> | <b>Oil and Chemicals</b>                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                           |
| 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.                                                                                                                                                                                                           | A lockable storage container is present between the contractor's offices and the material laydown areas. An additional storage container is also in place for storage within the contractor's camp.                                                                                                                                                                       |
| 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 | During the site audit no drip trays were observed on site, although the plant was all busy on site and not stationary. The ECO reports requested that drip trays be utilized for refueling and that a spill kit be made available at the site camp.                                                                                                                       |

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|     | contain the volume of oil in the vehicle.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 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).                                                                                                                                                                                                                                             | <p>This is noted, no fuel bowser was on site at the time of audit. No spills have occurred on site.</p> <p>The ECO reports requested that a spill kit be made available at the site camp.</p>                                                                                                                                                                                                                                               |
| 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).                                                                                                                                                                                                                                                                                                                                                                                                                               | This is noted, no fuel bowser was on site at the time of audit. No spills have occurred on site. The ECO reports requested that a spill kit be made available 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Construction vehicles are not serviced on site. Refueling on site if required should take place at the material stockpile and laydown areas, with a drip tray in place.                                                                                                                                                                                                                                                                     |
| 6.  | <b>Method Statements</b><br>The ECO will evaluate the method statement and ensure that it covers the handling of the following aspects: <ul style="list-style-type: none"> <li>• Emergency spills procedures for the contamination of soils from spills and fire.</li> <li>• Handling &amp; storage of oils and chemicals.</li> <li>• Cement and concrete batching, which includes the storage, washing &amp; disposal of cement, packaging, tools and plant.</li> <li>• Diesel tanks and refuelling procedures.</li> <li>• Crew camps and construction lay down areas.</li> <li>• Workshop maintenance and cleaning of plant.</li> </ul> | <p>The ECO has requested that method statements be drafted and included in the environmental file on-site. During the site audit such method statements were included in the environmental file covering;</p> <ul style="list-style-type: none"> <li>• Plant maintenance</li> <li>• Establishment of site camp</li> <li>• Storage of hazardous substances</li> <li>• Concrete batching</li> <li>• Demarcation of specific areas.</li> </ul> |
| 7.  | <b>Cement</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 7.1 | It is suggested that ready-mix cement be used as far as possible to minimize the possible impact on the surrounding environment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Cement batching was not active during the audit. The cement remains were cleared as requested by the ECO during the October site visit and no visible cement remains were noted on                                                                                                                                                                                                                                                          |

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|     |                                                                                                                                                                                                                                                                                                                                                                | site.                                                                                                                                                                                                                                                                                                  |
| 7.2 | Proper handling and disposal should minimise or eliminate discharges into watercourses.                                                                                                                                                                                                                                                                        | Cement batching was not active during the audit. The cement remains were cleared as requested by the ECO during the October site visit and no visible cement remains were noted on site.                                                                                                               |
| 7.3 | Fresh concrete and cement mortar should not be mixed below the 1:100 year floodline of the unnamed tributary of Sir Lowry's Pass River and at least 10 m from the delineated extent of all watercourses. Mixing of cement may be done within the construction camp, may not be mixed on bare soil, and must be within a lined, bound or bunded portable mixer. | Cement batching was not active during the audit. Cement mixing takes place at the material stockpile and laydown areas. An appropriate bunding must be in place.                                                                                                                                       |
| 7.4 | No mixed concrete shall be deposited directly onto the ground. A batter board or other suitable platform/mixing tray is to be provided onto which any mixed concrete can be deposited whilst it awaits placing.                                                                                                                                                | Cement mixing takes place at the material stockpile and laydown areas. An appropriate bunding must be in place.                                                                                                                                                                                        |
| 7.5 | Cement bags must be disposed of in the demarcated hazardous waste receptacles and the used bags must be suitably disposed of.                                                                                                                                                                                                                                  | Cement batching was not active during the audit. Provision has been made for packaging waste near the contractors' camp within a lockable container. This is deemed appropriate as it prevents litter and packaging from being blown around. Skips must be available on site once rubble is generated. |
| 7.6 | Spilled or excess concrete must be disposed of at a suitable landfill site.                                                                                                                                                                                                                                                                                    | The cement remains were cleared as requested by the ECO during the October site visit.                                                                                                                                                                                                                 |
| 7.7 | Cement batching areas must be located in consultation with the RE, EO or ECO to ensure residues are contained and that the proposed location does not fall within sensitive areas such as drainage lines, stormwater channels, etc.                                                                                                                            | Cement batching was not active during the audit. The cement remains were cleared as requested by the ECO during the October site visit.                                                                                                                                                                |
| 7.8 | The mixing of concrete shall only be done at selected sites on mortarboards or similar structures to contain run-off into natural                                                                                                                                                                                                                              | Cement batching was not active during the audit. Cement mixing takes place at the material stockpile and laydown areas. An                                                                                                                                                                             |

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|           | vegetation, soils and streams. Fresh concrete and cement mortar should not be mixed near the watercourses. No mixed concrete may be deposited outside of the designated construction footprint.                                          | appropriate bunding must be in place.                                                                                                                                                                                                                                                                  |
| 7.9       | Cleaning of cement mixing and handling equipment shall be done using proper cleaning trays.                                                                                                                                              | This is noted, the contractor to take cognizance.                                                                                                                                                                                                                                                      |
| 7.10      | All empty cement bags are to be picked up immediately to ensure that cement dust is not blown away. Empty cement bags are to be stored in a weather and scavenger proof bin, in order to prevent leaching and groundwater contamination. | Cement batching was not active during the audit. Provision has been made for packaging waste near the contractors' camp within a lockable container. This is deemed appropriate as it prevents litter and packaging from being blown around. Skips must be available on site once rubble is generated. |
| 7.11      | Washing of the remains into the ground is unacceptable.                                                                                                                                                                                  | The cement remains were cleared as requested by the ECO during the October site visit.                                                                                                                                                                                                                 |
| 7.12      | Should any cement silos be employed on site; they are to be fitted with appropriate air pollution control equipment to control dust during fill-up operations.                                                                           | No cement silos have been employed on-site to date.                                                                                                                                                                                                                                                    |
| 7.13      | A batter / dagga board mixing trays and impermeable sumps should be provided, onto which any mixed concrete can be deposited whilst it awaits placing.                                                                                   | This is noted, the contractor to take cognizance.                                                                                                                                                                                                                                                      |
| <b>8.</b> | <b>Dangerous and Toxic Materials</b>                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                        |
| 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.                                                                | No fuel bowzers were observed during the audit. A lockable storage container is present between the contractor's offices and the material laydown areas where all toxic material is currently stored. An additional storage container is also in place for storage within the contractor's camp.       |
| 8.2       | Storage facilities should be bunded, roofed, secure, rain, wind and tamper-proof.                                                                                                                                                        | A lockable storage container is present between the contractor's offices and the material laydown areas where all toxic material is currently stored. An additional storage container is also in place for storage within the contractor's camp.                                                       |

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| 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.                                                                                                                                                                                            | During the site audit the containers were not specifically marked or fitted with safety signs.                                                                  |
| 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 <b>Department of Water and Sanitation (DWS)</b> must be informed immediately. | A training manual is present within the environmental file on site. No pollution has been noted within the ECO reports, nor reported by the contractor on site. |
| <b>9.</b>  | <b>Bulk Storage of Fuels and Oils</b>                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                 |
| 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 is taking place on site.                                                                                                                   |
| 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 is taking place on site.                                                                                                                   |
| 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 is taking place on site.                                                                                                                   |
| 9.4        | Bulk fuel storage should be covered during the rainy season.                                                                                                                                                                                                                                                                                                                                    | No bulk fuel storage is taking place on site.                                                                                                                   |
| <b>10.</b> | <b>Use of Dangerous and Toxic Materials</b>                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                 |
| 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.                                                                                                                                                                                                                                                   | The ECO reports requested that a spill kit be made available at the site camp. Firefighting equipment is available at the site camp.                            |
| 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 with construction. These procedures must be                                                                                                                                                                                        | An environmental training manual that outlines all emergency procedures is available at the contractors camp as part of the environmental file.                 |

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|            | developed in consultation and approval by the appointed EO. All staff should receive some form of fire training.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                  |
| 10.3       | Fire buckets and hoses shall be in good working order and easily accessible on site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | The necessary firefighting equipment is available at the contractors camp.                                                                                                                       |
| <b>11.</b> | <b>Contractors Camp Site and Crew Camps</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                  |
| 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 contractors offices and site camp have been established near the entrance of the site and the housekeeping is in order. Bins are in place although these do not have lids.            |
| 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 nor fire facilities were 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 domestic animals are on site.                                                                                                                                                                 |
| 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 City of Cape Town Municipality's solid waste removal department. | Based on the ECO report provided and the site audit, the appropriate bins are in place on site as well as an additional litter structure. No litter was found/observed on-site during the audit. |
| 11.5       | Contractor laydown areas and equipment storage are to remain outside of the 32 m NEMA ZoR associated with the watercourses.                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Contractor laydown areas are located within the eastern section of the site and far away from any watercourse.                                                                                   |
| 11.6       | Accommodation for members of the workforce will not be permitted                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted, no accommodation facilities were observed during the site                                                                                                                                 |

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|            | on site unless authorisation has been given in terms of the Environmental Authorisation issued for the site.                                                                                                                                                                   | audit.                                                                                                                                                                                                                                                                                                                                           |
| 11.7       | Dedicated wash areas must be situated away from surface water sources.                                                                                                                                                                                                         | Noted, no specific washing areas were observed during the site audit.                                                                                                                                                                                                                                                                            |
| 11.8       | 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 generation was noted at the time of audit, although it is known that wind in this valley is at times significant. The contractor should consider covering stockpiles which are not in use and could generate dust where feasible. Material and rubble stockpiles which are not to be reused on site must be timeously removed from site. |
| 11.9       | 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 contractor's camp is located within the site boundary near the entrance to the site.                                                                                                                                                                                                                                          |
| 11.10      | 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.                                              | Housekeeping at the time of audit was good and no residual litter was noted on site nor at the contractors area.                                                                                                                                                                                                                                 |
| 11.11      | 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. | Housekeeping at the time of audit was good and no residual litter was noted on site nor the contractors area.                                                                                                                                                                                                                                    |
| <b>12.</b> | <b>Ablution Facilities</b>                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                  |
| 12.1       | The contractor will be responsible for providing all sanitary arrangements for his and the sub-contractors team. It is proposed that that <b>one toilet for 15</b> people will be established on site.                                                                         | Two chemical toilets were in place at the time of audit within the contractors camp area. The workforce on site does not exceed 30 people.                                                                                                                                                                                                       |
| 12.2       | Sanitary arrangements shall be to the satisfaction of the ECO and the local authority. The contractor shall keep the toilets in a clean,                                                                                                                                       | Both chemical toilets are in a clean condition.                                                                                                                                                                                                                                                                                                  |

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|            | 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.                                                                                                                                                        | Two chemical toilets were in place within the contractors camp area. Both toilets are within 150m from the farthest point on the site.                   |
| 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.                                                                                                                               | Chemical toilets are in good clean condition and are serviced by a separate contractor.                                                                  |
| 12.5       | Toilets out on site must be secured to the ground and have a sufficient locking mechanism operational at all times.                                                                                                                                                                                                                                                                                                                            | Both toilets have been secure through iron droppers in the ground. Please refer to Appendix A.                                                           |
| <b>13.</b> | <b>Dust</b>                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                          |
| 13.1       | Implementation of the Dust Management Plan compiled by Guillaume Nel Environmental Consultants is imperative.                                                                                                                                                                                                                                                                                                                                  | The contractor to take cognizance.                                                                                                                       |
| 13.2       | 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. | Noted, no dust fallout was observed during the site audit and potable water has not been utilized. No water cart was noted on site at the time of audit. |
| 13.3       | The construction camp shall be treated with dust suppression during dry and windy conditions to control dust fallout.                                                                                                                                                                                                                                                                                                                          | No dust generation was noted at the time of audit, although it is known that wind in this valley is at times significant. The contractor                 |

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|            | Dust production must be controlled by regular dust suppression of roads and works area, should the need arise.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | should consider covering stockpiles which are not in use and could generate dust where feasible. Material and rubble stockpiles which are not to be reused on site must be timeously removed from site. |
| 13.4       | At the end of construction, the site camp must be fully rehabilitated by removing the temporary surface, ripping the area to loosen the soil.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted. To be audited at the end of construction.                                                                                                                                                        |
| 13.5       | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | No transport vehicles were noted on site at the time of audit.                                                                                                                                          |
| <b>14.</b> | <b>Noise</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                         |
| 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. No complaints were noted from the contractors.                                                                                       |
| 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, machinery on site seems to be in good order.                                                                                                             |

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| <b>15.</b> | <b>Visual Management</b>                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 15.1       | Survey and demarcate no-go areas to restrict earthworks and minimize disturbance and visual scarring. Only work in areas where construction is going to happen immediately.                                                                                                                                                                       | The construction footprint has been demarcated with droppers prior to commencement. The site boundary has been demarcated with 1.8m ClearVu fencing and the botanical no-go area along the southwestern corner of the site has been demarcated with painted droppers and string. The dam area located in the northeastern corner of the site has also been demarcated with orange netting and painted droppers. |
| 15.2       | Limit extent of damage, keeping cut and fill to a minimum. Minimise disturbance through fencing off construction areas, thereby protecting and retaining grass and vegetation in the areas that will not be built on.                                                                                                                             | The entire site, apart from a portion towards the east of the site will be developed with hard surface. This portion will be retained as an open space, and this is where the topsoil and excavated material is currently stockpiled. This excludes the river rehabilitation areas and conservation areas which are treated as no-go areas.                                                                     |
| 15.3       | Plant boundary windbreaks/trees as soon as construction starts, in all areas even those areas being developed in later phases.                                                                                                                                                                                                                    | This has not yet commenced. The Blue Gum tree lines on the boundaries of the site have thus far been retained.                                                                                                                                                                                                                                                                                                  |
| 15.4       | Similarly, do required planting in buffer areas around the historic precinct on commencement of Phase 1 Construction/development.                                                                                                                                                                                                                 | Noted, this refers to the development north of the Old Sir Lowry's Pass Road and not part of this development.                                                                                                                                                                                                                                                                                                  |
| 15.5       | Vegetate road verges and parks immediately after construction, rehabilitate riverine area as soon as and continue maintenance eternally. The timelines stipulated in the Rehabilitation Plan compiled by Mr Christoff Dippenaar and the Watercourse Rehabilitation and Management Plan compiled by FEN Consulting however still takes preference. | Noted, this is not yet relevant per the timeframes provided and will again be audited at a later stage.                                                                                                                                                                                                                                                                                                         |
| 15.6       | Shade cloth must be utilised to conceal and minimise the visual impact of contractor camps, lay down and storage areas.                                                                                                                                                                                                                           | No shade cloths were utilised during the site audit apart from the demarcation of natural areas.                                                                                                                                                                                                                                                                                                                |
| 15.7       | 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                                                                                                                                                                                                               | Provision has been made for litter on site. Stockpiles of excavated material which will not be reused must be removed from site every                                                                                                                                                                                                                                                                           |

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|            | as designated by the City of Cape Town Municipality Solid Waste removal department.                                                                                                                                                                                                                                                                                                                                                           | two weeks.                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>16.</b> | <b>Fires</b>                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                              |
| 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.                                                                                                                                                                                                                                                                      | Appropriate firefighting equipment is available at the site 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.<br>Fires in the designated areas must be small in scale so as to prevent excessive smoke being released into the atmosphere.<br>Heavy smoke may not be released into the air. | No evidence of fires was observed during the site audit.                                                                                                                                                                                                                                                                                                                                                     |
| 16.4       | No felling of trees or wood collection is allowed from private or public property.                                                                                                                                                                                                                                                                                                                                                            | Felled tree remains are present on site, although these were not felled for fire purposes.                                                                                                                                                                                                                                                                                                                   |
| <b>17.</b> | <b>Erosion and Sedimentation</b>                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                              |
| 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 erosion or sedimentation were observed during the site audit. The entire site, apart from a portion towards the east of the site will be developed with hard surface. This portion will be retained as an open space, and this is where the topsoil and excavated material is currently stockpiled. This excludes the river rehabilitation areas and conservation areas which are treated as no-go areas. |
| 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                                                                                                                                                                                                                                        | Noted, no erosion or sedimentation were observed during the site audit. This item to be audited in future after construction has been completed.                                                                                                                                                                                                                                                             |

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|                    | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                     |
| 17.3               | In the case of strong wind and/or rain all stockpile material must be covered with a tarpaulin in order to prevent erosion.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | No signs of erosion are visible on stockpiles, and stockpile material has not been sufficiently covered during the raining periods. |
| <b>18.</b><br>18.1 | <b>Fauna</b><br>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.                                                                                                                                                                                                                     | Noted, all construction workers are aware of this and no killing, hunting or trapping of animals have occurred.                     |
| <b>19.</b><br>19.1 | <b>Heritage</b><br>In terms of the National Heritage Act, 1999 (Act No. 25 of 1999), should any archaeological artefacts be exposed during construction activities, work on the area where the artefacts were found shall cease immediately and the ECO as well as the Local Council shall be notified within 24 hours. Finds of human remains must be treated as a crime scene. Upon receipt of such notification, the ECO will arrange for the excavation to be examined by an Archaeologist. Under no circumstances shall archaeological artefacts be removed, destroyed or interfered with. Any archaeological sites exposed during demolition or construction activities must not be disturbed prior to authorisation by the Heritage Western Cape and/or the | No archaeological artefacts have been exposed during the installation of civil services.                                            |

|            |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                        |
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|            | South African Heritage Resources Agency or the appropriate provincial heritage resource agency.                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                        |
| 19.2       | Trenching activities with 50m of the main house must be checked by an archaeologist. Indications are that development activity will be away from the homestead so further action may not be necessary.                                                                                                                                                                                                                                       | The approved Conservation/Heritage Management Plan will be followed when construction occurs adjacent to the vernacular cottage precinct, although not part of this phase of the development.                                          |
| 19.3       | Any proposed alterations (including maintenance) for the vernacular cottage precinct will be required to be submitted to HWC for approval and must be accompanied by more detailed proposals for the precinct, including an appropriate maintenance and refurbishment plan, and plans for landscaping, boundary treatment and signage.                                                                                                       | This is noted.                                                                                                                                                                                                                         |
| <b>20.</b> | <b>Hydrology</b>                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                        |
| 20.1       | All work within the watercourse area must be done during the dry season and consideration has not been given to any temporary water diversions.                                                                                                                                                                                                                                                                                              | Noted, at the time of audit no work had been undertaken within the watercourse. Only the fencing around the site has been erected in the vicinity of the watercourse.                                                                  |
| 20.2       | Areas which are to be cleared of vegetation, including contractor laydown areas, must remain as small as possible, in order to reduce the risk of proliferation of alien vegetation, and in order to retain a level of protection to the watercourses during construction (e.g. dust generation, sediment trapping, slowing of stormwater runoff – specifically due to the study area being at a gradient sloping towards the watercourses). | Noted and complied with. The construction footprint has been made as small as possible during the installation of civil services. Cleared vegetation is stockpiled on-site and no alien vegetation was observed at construction areas. |
| 20.3       | Clear areas for the proposed construction in a phased manner and retain as much indigenous vegetation as possible.                                                                                                                                                                                                                                                                                                                           | At the time of audit the cleared areas for construction has only included the excavation ditches for the installation of services.                                                                                                     |
| 20.4       | The proposed excavation activities for the removal of the unauthorised infilled material will potentially result in bank destabilisation, and an increase in bank incision and sedimentation                                                                                                                                                                                                                                                 | Noted, at the time of audit no work had been undertaken within the watercourse. Only the fencing around the site has been erected in the vicinity of the watercourse.                                                                  |

|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                               |
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|      | of the watercourses. Therefore, sediment control devices must be constructed in situ prior to excavation activities and reshaping activities. Ensure sediment control devices are in place prior to the start of excavation activities. Maintain sediment / erosion control devices to minimise risk of sedimentation of the downstream areas. Storm water, wherever possible, should be allowed to soak into the land in the area on which the water fell. | <u>Contractor to take note of this requirement</u> for sediment control devices.                                                                                                                                              |
| 20.5 | The removed vegetation must be stockpiled outside of the delineated boundary of the wetlands. The footprint areas of these stockpiles should be kept to a minimum. Should the vegetation not be suitable for reinstatement after the construction phase or be alien/invasive vegetation species, all material must be disposed of at a registered garden refuse site and may not be burned or mulched on site.                                              | At the time of audit the cleared areas for construction has only included the excavation ditches for the installation of services. Felled tree remains are present on site, although these were not felled for fire purposes. |
| 20.6 | Should construction works not be finalised during the dry season, a coffer dam area can be created and dewatered around the construction area associated with any pillars by using sandbags and cobbles. Water must be diverted into the downstream reaches, around the coffer area. Water must be allowed to flow to the downstream reaches at all times. And sediment traps must be installed.                                                            | Noted. Not yet applicable.                                                                                                                                                                                                    |
| 20.7 | Sediment traps must be installed every 20 m downstream for any works for a length of 200 m.                                                                                                                                                                                                                                                                                                                                                                 | Noted. Not yet applicable.                                                                                                                                                                                                    |
| 20.8 | Ensure that the creation of the diversion (by means of sandbags) does not result in a significant water level difference upstream or downstream of the installation site.                                                                                                                                                                                                                                                                                   | Noted. Not yet applicable.                                                                                                                                                                                                    |
| 20.9 | The area must be suitably compacted and reshaped to levels close to the surrounding wetland habitat to allow opportunities for the                                                                                                                                                                                                                                                                                                                          | Noted. Not yet applicable.                                                                                                                                                                                                    |

|       |                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                     |
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|       | reinstatement of wetland habitat and to prevent any erosion or preferential flow paths from occurring. All shaping must be done as natural as possible, and the area should be designed to have varying depths to facilitate microhabitat formation.                                                                                                                                                                          |                                                                                     |
| 20.10 | The excavated fill material can be spoiled on site. However, not within the watercourses or open spaces. All excavated material will be spoiled within the existing farm dam which will be used as a stormwater attenuation pond.                                                                                                                                                                                             | Noted. No fill material has been excavated or spoiled within the dam.               |
| 20.11 | No hard infrastructure is allowed within the reshaped area and use of hard engineering structure (such as gabion retention structures or reno-mattresses) should be avoided as far as feasibly possible.                                                                                                                                                                                                                      | Noted. Not yet applicable.                                                          |
| 20.12 | Rehabilitation of the disturbed area must be undertaken, including re-vegetation with indigenous wetland vegetation and stabilisation of the embankments of the unnamed tributary in the affected area following a suitably developed watercourse management plan for the study area.                                                                                                                                         | Noted. Not yet applicable.                                                          |
| 20.13 | A step-by-step approach related to the removal of the infill material, as well as the rehabilitation of the wetland area has been stipulated in the Watercourse Rehabilitation and Management Plan prepared by Freshwater Ecological Network (FEN) which should be followed.                                                                                                                                                  | Noted. Not yet applicable.                                                          |
| 20.14 | The use of Sustainable Drainage Systems (SuDs) to manage stormwater is considered critical for the mixed-use development as there will be an increase in hardened surfaces within close proximity to the watercourses. SuDs will assist in preventing significant impacts on the hydrological functioning of the watercourses, reduce the risk of flooding during high flow periods and reduce the risk of increased erosion. | Noted. Not yet applicable. No stormwater runoff was observed during the site audit. |

|       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                     |
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|       | <ul style="list-style-type: none"> <li>- SuDs should be constructed through excavation of the in-situ material, sloped to a ratio not steeper than 3:1 and lined with rocks and cobbles to assist with energy dissipation and prevent sedimentation and erosion as well as improve the aesthetic appeal of the SuDs.</li> <li>- SuDs should be vegetated with indigenous obligate and facultative species suitable for seasonal saturation. Wooden boardwalks could be developed over the swales for pedestrian walkways should the developer so desire.</li> </ul> |                                                                                     |
| 20.15 | Cobbles should be placed in front of the stormwater discharge points and below the reno mattress to further assist with energy dissipation. At no point should erosion or gully formation be allowed as this will have impact on the water dispersal into and across the watercourses, which could potentially reduce the extent and functionality of the wetland in the long-term.                                                                                                                                                                                 | Noted. Not yet applicable. No stormwater runoff was observed during the site audit. |
| 20.16 | The culvert structure must extend the width of the tributary to ensure recharge of the tributary downgradient of the crossing.                                                                                                                                                                                                                                                                                                                                                                                                                                      | Noted. Not yet applicable. No stormwater runoff was observed during the site audit. |
| 20.17 | The crossing and the through-flow structures should be sized to accommodate a 1:100 year flood and must be placed to be level/flush with the tributary bed to ensure under scouring or erosion at the inlet side does not occur.                                                                                                                                                                                                                                                                                                                                    | Noted. Not yet applicable. No stormwater runoff was observed during the site audit. |
| 20.18 | It is recommended that the construction associated with the culvert be undertaken during the dry summer months, when limited throughflow of water is experienced. However, should construction occur within the rainy season, a diversion for the drainage line should be excavated around the proposed culvert crossing location for the period of construction to ensure hydrological connectivity is maintained, however this should be considered at the time of                                                                                                | Noted. Not yet applicable. No stormwater runoff was observed during the site audit. |

|            |                                                                                                                                                                                                                                          |                                                                                                                                                                                                          |
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|            | construction on consultation with the ECO.                                                                                                                                                                                               |                                                                                                                                                                                                          |
| 20.19      | During excavation activities, soil removed from the dewatered section should be stockpiled outside the delineated edge of the tributary.                                                                                                 | Noted. Not yet applicable.                                                                                                                                                                               |
| 20.20      | Trenches should be backfilled as soon as the pipes have been installed in any given section in order to reduce potential erosion of exposed soil.                                                                                        | Complied with, as civil services are installed and completed, backfilling commences immediately thereafter.                                                                                              |
| 20.21      | Unused excavated soil/sediment should be utilised as part of the open space areas or be removed from site to a registered landfill.                                                                                                      | Noted. Stockpiles of excavated material is currently stockpiled within the future open space area. Stockpiles which will not be reused must be removed from site to a registered landfill site.          |
| 20.22      | Soil surrounding the wingwalls must be suitably backfilled and sloped (minimum of a 1:3 ratio) and concrete aprons as well as gabion mattresses should be installed both up and downstream for energy dissipation and sediment trapping. | Noted. Not yet applicable.                                                                                                                                                                               |
| 20.23      | All stockpiles must be located at least 10 m from the delineated extent of the tributary should not exceed 2 m in height and should be covered with a suitable geotextile such as hessian sheeting to prevent excessive dust generation. | Complied with all stockpiles are located within the construction footprint at the temporary laydown area and no stockpiles exceed 2m in height.                                                          |
| 20.24      | No formal paving should be used for the proposed walkway. In situ compaction of soil for the walkways as proposed is preferred.                                                                                                          | Noted. Not yet applicable.                                                                                                                                                                               |
| 20.25      | Revegetation of the areas surrounding the walkways with suitable indigenous species is recommended. These can be low growing species such as grasses, shrubs, or fynbos vegetation to allow access for access during fire emergencies.   | Noted. Not yet applicable.                                                                                                                                                                               |
| <b>21.</b> | <b>Soil</b>                                                                                                                                                                                                                              |                                                                                                                                                                                                          |
| 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                                            | Some topsoil was noted to be stockpiled along the eastern section of the site. It should be ensured that the topsoil and other subsoils are clearly separated and demarcated as such. It was furthermore |

|      |                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                 |
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|      | permanent works, pipeline trenches, stockpiles, access roads, construction camps and lay down areas.                                                                                                                                                                                                                                                                              | noted that some of the lesser quality soils were sieved on site and utilized as bedding sand. All topsoil should be retained for future rehabilitation purposes.                                                                                                                |
| 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. | Topsoil was stripped during site establishment and as construction activities progressed. Some topsoil was noted to be stockpiled along the eastern section of the site. It should be ensured that the topsoil and other subsoils are clearly separated and demarcated as such. |
| 21.3 | The soils surrounding the wingwalls and concrete aprons must be suitable loosened on completion of construction activities.                                                                                                                                                                                                                                                       | Noted. Not yet applicable.                                                                                                                                                                                                                                                      |
| 21.4 | Backfill will require contouring to ensure that it blends in with the surrounding environment.                                                                                                                                                                                                                                                                                    | Noted. Not yet applicable.                                                                                                                                                                                                                                                      |

## CONCLUSION

Based on the information obtained and a site visit conducted on the 8<sup>th</sup> of November 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.

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 off Old Sir Lowrys Pass Road.



The site as seen from the entrance off Sir Lowrys Pass Road towards the east.



Contractors site office container.



Site office container and additional chemical toilet.



Additional chemical toilet present on-site adjacent to the contractors camp.



Wooden dropper stockpiles adjacent to the contractors camp.



Small dam within the northern fence line which has been temporarily demarcated as no-go area.



The proximity of the closest service manhole to the demarcated dam.



Demarcation of the small dam with orange netting and yellow stakes as seen towards the east.



Demarcation of the small dam with orange netting and yellow stakes as seen towards the north.



Demarcation of the small dam with orange netting and yellow stakes as seen towards the north.



Orange netting demarcation of the dam ending at the fence line along the northern boundary.



Rhine River watercourse leading immediately north of the fence underneath the Old Sir Lowrys Pass Road.



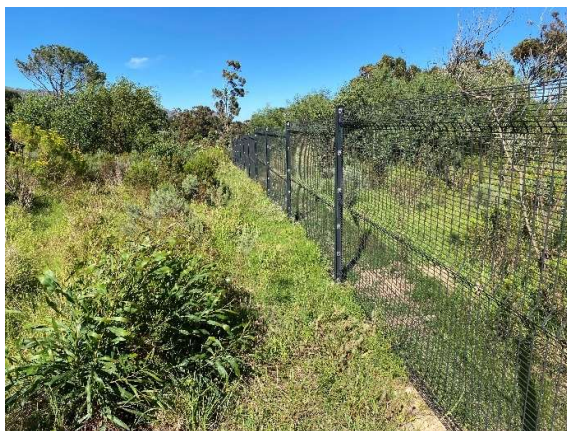
Proximity of the Rhine River to the fence line underneath towards the north of the site.



Condition of the northern boundary of the site with the fence line in place seen towards the northwest.



Condition of the northern boundary of the site with the fence line in place seen towards the east.



Condition of the northern boundary of the site with the fence line in place seen towards the west.



A view of the site from the northern boundary across the site towards the south.



Condition of the site near the wild olive groves as seen towards the east.



Installation of bulk services along the northwestern corner of the development footprint seen to the west.



Installation of bulk services along the northwestern corner of the development footprint seen to the east.



Wild olives in place to be retained along the fence line in the northwestern corner of the site.



Rocky outcrop area with additional excavated rocks stockpiled just northeast of the attenuation area.



The location of the attenuation area along the western end of the development footprint seen to the southwest.



The location of the attenuation area along the western end of the development footprint seen to the north.



The semi intact vegetation area. The conservation area is demarcated with painted droppers and string.



The semi intact vegetation area. The conservation area is demarcated with painted droppers and string.



The semi intact vegetation area. The conservation area is demarcated with painted droppers and string.



The semi intact vegetation area. The conservation area is demarcated with painted droppers and string.



The conservation area along the southern boundary fence line seen towards the southwest.



The conservation area along the southern boundary fence line seen towards the west corner of the fence.



Installation of bulk services underway just towards the west of the conservation area.



The installation of sewer and stormwater services along the western end of the development footprint.



The installation of sewer and stormwater services along the western end of the development footprint.



Temporary access to the property located south of the site.



Condition of the site towards the southwestern corner of the site as seen towards the east.



Trench excavations along the southern portion of the site where bulk services are being installed.



Sewer pipes being installed along the southern portion of the site as seen towards the east.



Installation of sewer pipelines along the southern portion of the site.



Installed sections of sewer pipelines along the southeastern section of the site.



Excavations along the southeastern portion of the site showing the subsoil layers.



Contractors sieving excavated soil materials by size using a sieve.



Condition of the site towards the centre of the site as seen towards the west.



Condition of the site towards the centre of the site as seen towards the west.



Wild olive trees still in place as identified in Figure 2 of this report.



Temporarily stockpiled stormwater pipelines near the eastern centre of the site seen towards the southeast.



Soil and rock stockpiles present along the laydown area near the eastern centre of the site seen.



Temporarily stockpiled stormwater pipelines near the eastern centre of the site seen towards the south.



Sewer and water pipes at the current material laydown area along the eastern portion of the site.



Stormwater pipes at the current material laydown area along the eastern portion of the site.



Sand and sieving area towards the centre of the site near the stockpile area.



Installation of sewer pipes along the centre of the site as seen towards the west.



Installation of sewer, and potable water services as seen towards the east.



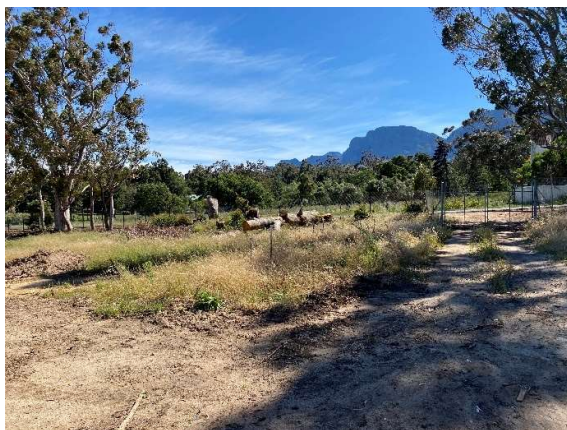
Installation of sewer, and potable water services as seen towards the east.



Cleared Blue Gum trees and roots, temporarily stockpiled along with topsoil towards the east of the site.



Cleared Blue Gum trees and roots, temporarily stockpiled along with topsoil towards the east of the site.



Additional entrance to the construction site located in the southeastern corner of the site.



Condition of the site along the eastern boundary and Old Sir Lowrys Pass Road as seen towards the north.



Condition of the site along the eastern boundary and Old Sir Lowrys Pass Road as seen towards the north.



Service manhole in place at the southeastern corner of the site seen towards the west along the southern boundary.



Cleared vegetation and stockpiled topsoil towards the east of the site.



Cleared vegetation and stockpiled topsoil towards the east of the site. .



Excavated soil stockpiles on-site containing some broken rocks.



General condition of the site along the Old Sir Lowry Pass road as seen towards the northwest.



Felled Blue Gum trees (cleared vegetation) temporarily stockpiled on site.



Lockable container for material storage. Brick stockpiles also temporarily stored in proximity to contractors camp.



Lockable container for material storage. Brick stockpiles also temporarily stored in proximity to contractors camp.



Excavated soil stockpiles on-site containing some broken rocks.



Excavated material and rubble stockpiles near the entrance to the site to be removed.



Installation of potable water pipelines along the centre-eastern section of the site. Also note the broken rock.

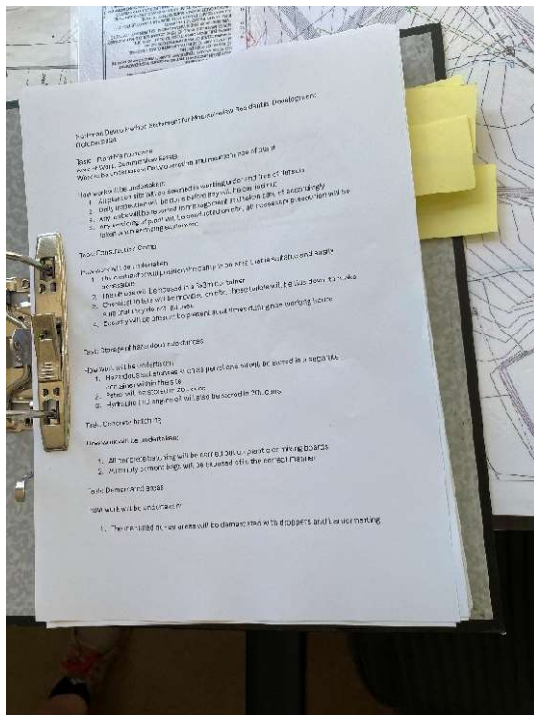


Installation of potable water pipelines near the contractors camp.

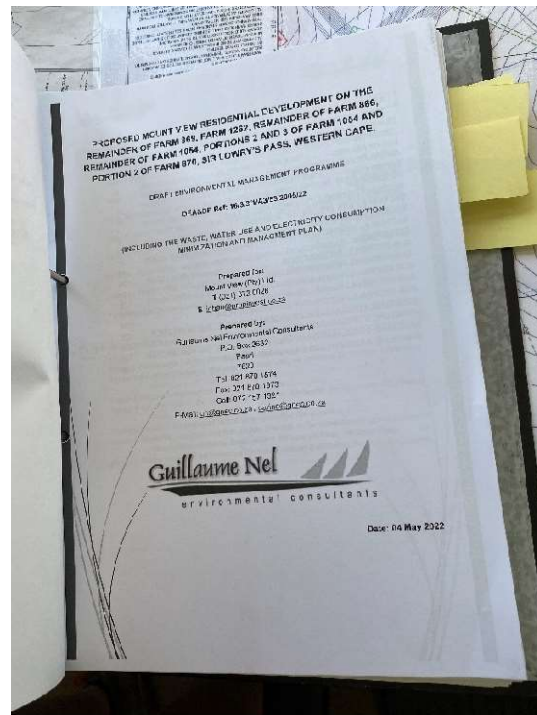


Installation of potable water pipelines along the centre-eastern section of the site.

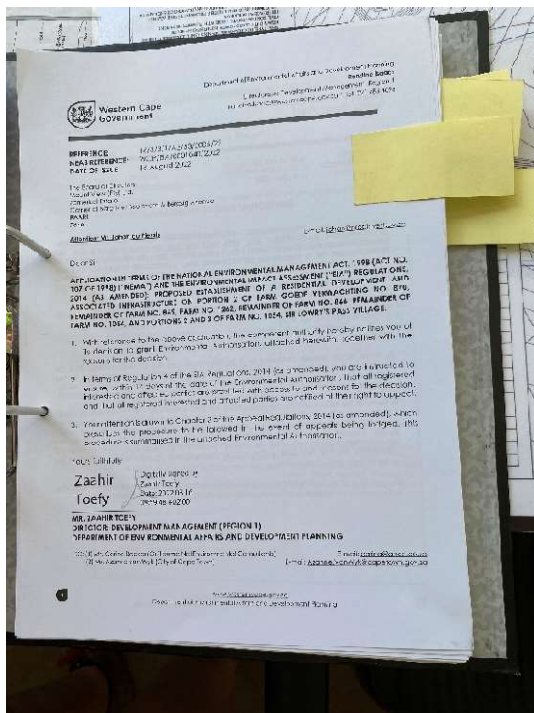
## Environmental File on Site



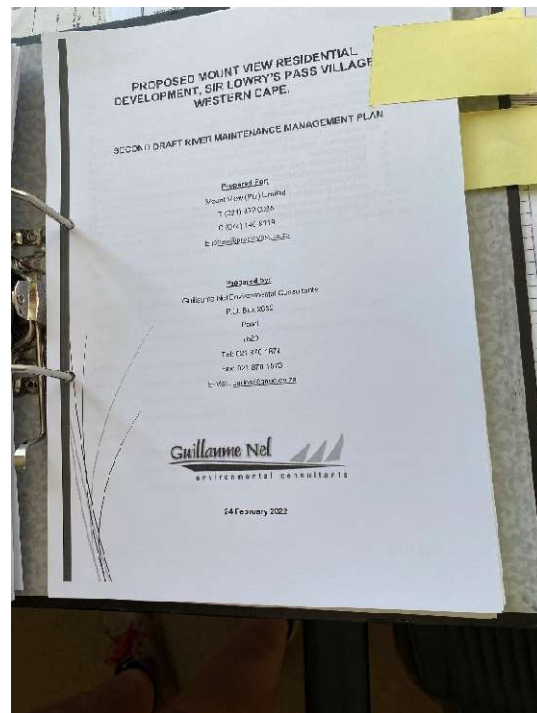
Installation of sewer and stormwater services.



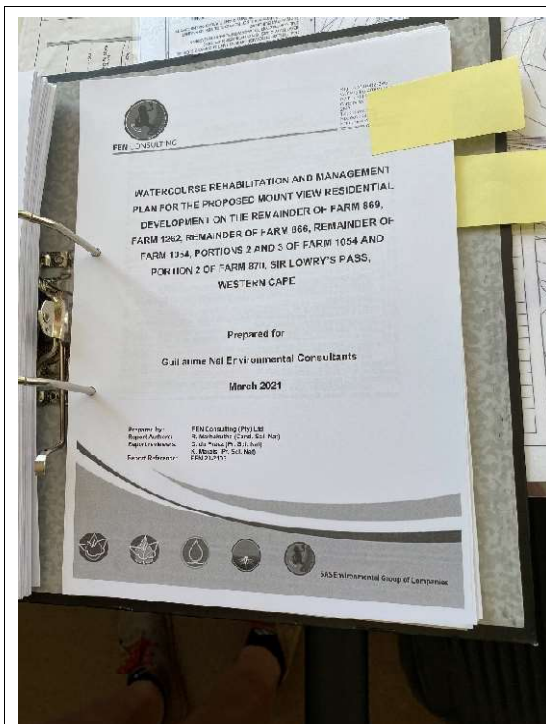
Installation of sewer and stormwater services.



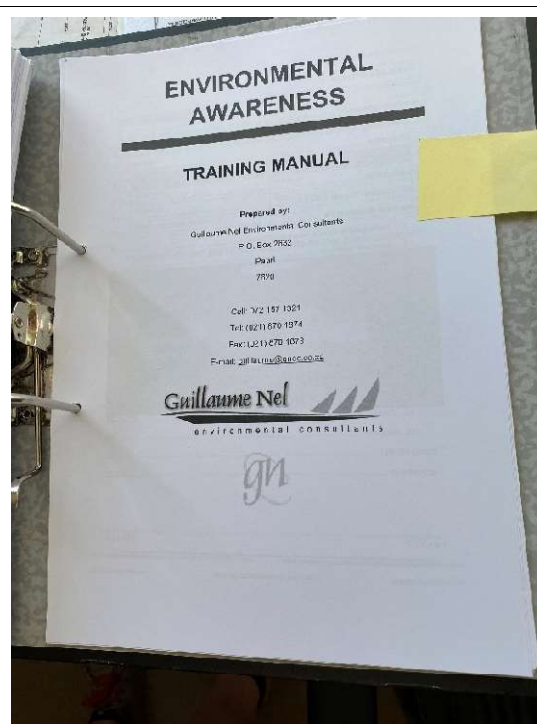
Installation of sewer and stormwater services.



Installation of sewer and stormwater services.



Installation of sewer and stormwater services.



Installation of sewer and stormwater services.