ATT: ZAAHIR TOEFY

PROPOSED DEVELOPMENT OF A RESIDENTIAL ESTATE ON PORTION 53 OF THE FARM KRAAIBOSCH 195, GEORGE

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

DEA&DP EIA REF. NO. 16/3/3/1/D2/19/0007/23
NEAS REF. NO. WCP/EIA/0001268/2023

Prepared for:
The Managing Director
Springfield Estates (Pty) Ltd.
3rd Floor, Dynarc House
31 Courtenay Street
George
6530

Mr José Rodrigues
Mobile: 083 326 3548
E-mail: jose@vantageprop.co.za

Prepared by:
Kapp Environmental Consultants (Pty) Ltd
P.O.Box 121
Mossel Bay
6500
Cell: 082 675 5233
E-Mail: renier@kappec.co.za

KAPP ENVIRONMENTAL CONSULTANTS

KAPPEC

18 July 2025

DETAILS OF THIS REPORT

Status of this Report	**Final Regulation 34 External Compliance Audit Report**
Date Submitted	July 18, 2025
Public Review Period	Not Applicable
Report Title	Proposed Development of a Residential Estate on Portion 53 of the Farm Kraaibosch 195, George.
Applicant	**The Managing Director** **Springfield Estates (Pty) Ltd.** 3rd Floor, Dynarc House 31 Courtenay Street George 6530 Mr José Rodrigues Mobile: 083 326 3548 E-mail: jose@vantageprop.co.za
Prepared by	**Renier Kapp** **Kapp Environmental Consultants (Pty) Ltd** P.O.Box 121 Mossel Bay 6500 Cell: 082 675 5233 E-Mail: renier@kappec.co.za
KAPP ENVIRONMENTAL CONSULTANTS	

DISCLAIMER

This report has been prepared for the Managing Director of Springfield Estates (Pty) Ltd., represented by Mr José Rodrigues and is subject to and issued in accordance with the agreement with Kapp Environmental Consultant (Pty) Ltd. (KAPPEC). The contact person listed for further communication is Mr. Mynhardt Enslin.

The opinions expressed in this report have been based on the information supplied to KAPPEC by the Client and the relevant Environmental Assessment Practitioner. The Author has exercised all due care in reviewing the supplied information, but conclusions from the review are reliant on the accuracy and completeness of the supplied data. KAPPEC does not accept responsibility for any errors or omissions in the information supplied 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 (EP) hereby declare that I:

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

(Renier Kapp)

Signature of the Principle Environmental Assessment Practitioner

Kapp Environmental Consultants (Pty) Ltd (KAPPEC)

Name of Company

18 July 2025

Date

CONTENTS

LIST OF FIGURES

LIST OF TABLES

ABBREVIATIONS

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

APPENDICES

Appendix A: Site Photographs
Appendix B: Site Development Plan
Appendix C: Copy of EA
Appendix D: Copy of EMPr
Appendix E: Commencement Notification
Appendix F: Method Statements
Appendix G: ECO reports
Appendix H: Stormwater Management Plan
Appendix I: Waste Management
Appendix J: WULA

INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated June 2025, by the Managing Director of Springfield Estates (Pty) Ltd., represented by Mr José Rodrigues (the Applicant) as the independent environmental assessment practitioners to undertake an external compliance audit in fulfilment of Condition 17 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was initially granted on 24 November 2008 under DEA&DP reference EG12/2/1-AG3-5516. This EA has since been amended by way of replacement, and a new Environmental Authorisation has been issued (DEADP Ref. 16/3/3/1/D2/19/0007/23). The competent authority (DEA&DP) grants this amendment by replacing the existing valid Environmental Authorisation with the new Environmental Authorisation. Furthermore, the authority grants Environmental Authorisation to the applicant to undertake the listed activities specified in Section B, with respect to the Preferred Alternative as described in the Integrated Final Basic Assessment Report (FBAR) and Final Impact Report dated 18 July 2023, prepared and submitted by HilLand Environmental, the appointed environmental practitioner (EP). A single Environmental Authorisation is thus issued in the name of the Applicant, covering all aspects for which authorisation has been granted.

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 Authorisation 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 summarised in the report, including its corresponding level of compliance with each condition.
The methodology followed for conducting the environmental audit included:

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

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

TABLE 1: COMPLIANCE RATING

Colour	Compliance Rating Significance
GREY (N/A)	A grey item indicates that a compliance rating is not relevant. Item is listed

	for awareness although will not/cannot be rated.
GREEN (4)	An item is marked green to indicate complete compliance in line with the EMP.
YELLOW (3)	An item is marked yellow to indicate sufficient compliance although possibly not as prescribed in the EMP.
ORANGE (2)	An item is marked orange to indicate a non-compliance although the resulting impact is not deemed significant.
RED (1)	An item is marked red to indicate a significant or ongoing non-compliance which needs to be addressed as per the EP instruction.

PROJECT DESCRIPTION

The proposed development will take place on **Portion 53 of the Farm Kraaibosch 195**, located north of the Garden Route Mall and adjacent to the Kraaibosch Park residential development on Glenwood Avenue, George. The project forms part of a phased residential development which has lawfully commenced in terms of the original Environmental Authorisation. The current phase introduces an amendment to the site development plan (SDP), including an increase in residential density and a land use change in the north-western corner of the property.

The initial phase of the development, approved under the original Environmental Authorisation, allowed for a density increase from approximately 11 dwelling units per hectare (du/ha) to approximately 18.74 du/ha. This revised density has now been authorised. The amendment further entails the conversion of a previously designated Private Open Space area in the north-west corner of the property to accommodate residential development, internal roads, and functional open space.

The updated development proposal includes the following:

- **299 residential units** comprising various housing types (at a density of 19 du/ha);
- **Internal road network** for access and circulation;
- **Gatehouse and clubhouse** for controlled access and resident amenities;
- **Refuse area** for on-site waste management;
- **Internal open space areas** designated for recreation and community infrastructure.

In line with environmental constraints and conditions of the existing Record of Decision (ROD), **no development is permitted**:

- Within the **1:100-year floodline**, except where roads or pipelines must cross watercourses;
- On **slopes steeper than 1:4 (≥25°)**;
- Within **30 metres of the Modderrug River** or the edges of associated wetlands and dams.

The need and desirability of the project stems from market demand for increased residential housing density and the support of the George Municipality for higher-density group housing. The project aligns with the municipality's objective to optimise land use for housing provision.

Biophysical Considerations:
The site falls within the Critically Endangered Garden Route Granite Fynbos vegetation type. Although clearing is required in the area previously designated as open space (±300 m²), a Terrestrial Biodiversity Compliance Statement has confirmed that the site is already highly transformed, contains no Species of Conservation Concern (SCCs), and does not support habitat for such species. The loss of vegetation in this transformed area is therefore deemed acceptable.

Aquatic Biodiversity Considerations:
A desktop and on-site verification by a freshwater specialist concluded that the proposed development will not take place within any watercourses or their buffers. The sensitivity of the

aquatic environment is low, and the development does not fall within the regulated area of the Modderrug River. Accordingly, no Section 21(c) or (i) Water Use Authorisation in terms of the National Water Act, 1998 is required.

The remaining riparian buffer zone along the Modderrug River will be retained, rehabilitated, and managed as a conservation area, with no construction of structures or infrastructure authorised within this zone.

LISTED ACTIVITIES

Environmental Impact Assessment Regulations Listing Notice 1 of 2014, as amended.

Activity Number: 27

Activity Description:

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

(aa) the undertaking of a linear activity; or

(bb) maintenance purposes undertaken in accordance with a maintenance management plan.

The clearance of more than 1 ha of indigenous vegetation for the development of a residential estate.

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 development of a residential estate on land that was used for agriculture of more than 5ha.

Environmental Impact Assessment Regulations Listing Notice 3 of 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

The development of roads wider than 4 metres within areas containing indigenous vegetation and areas zoned as open space.

Activity Number: 12

Activity Description:

The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan

i. Western Cape

i. Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;

ii. Within critical biodiversity areas identified in bioregional plans;

iii. Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;

iv. On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or

v. On land designated for protection or conservation purposes in an Environmental Management

Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister

The clearance of more than 300m^2 of Endangered Garden Route Granite Fynbos and land that is zoned as open space for the residential development and associated infrastructure.

REGULATION 34 EXTERNAL AUDIT REQUIREMENTS

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

Environmental audit report

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

Objective of the environmental audit report

The objective of the environmental audit report is to

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

Content of environmental audit reports

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

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

impacts associated with the undertaking of the activity on an on-going basis;

ii. sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and

iii. ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan;

f) a description of any assumptions made, and any uncertainties or gaps in knowledge;

g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report;

h) a summary and copies of any comments that were received during any consultation process; and

i) any other information requested by the competent authority.

Additional requirement as per the EA of the environmental audit report

17. The frequency of auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr, must adhere to the following programme:

17.1. Auditing during the non-operational phase (construction activities):

17.1.1. During the period which the development activities have been commenced with on the site, the Holder must ensure **annual environmental audit(s)** are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority.

17.1.2. A final Environmental Audit Report for the construction phase (non-operational component) must be submitted to the Competent Authority within **three (3) months** of completion of the construction phase.

FIGURE 1: SITE DEVELOPMENT PLAN – TOPOLOGIES AND PHASES

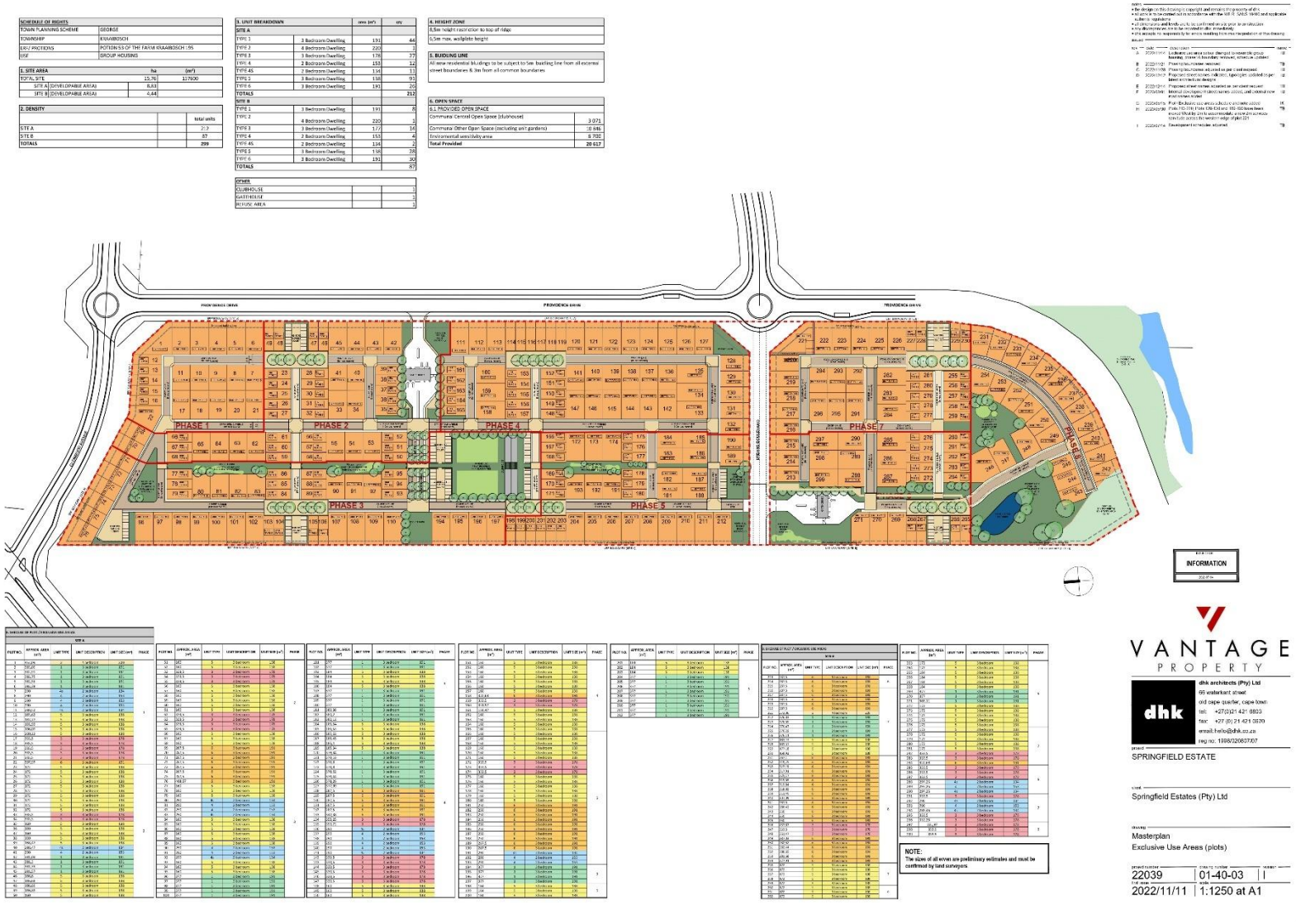

FIGURE 2: SITE DEVELOPMENT PLAN - ERVEN

CONDITIONS OF AUTHORISATION

TABLE 2: ENVIRONMENTAL AUTHORISATION GENERAL CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
1.	This Environmental Authorisation is granted for the period from date of issue until **30 November 2033** (validity period), during which period the Holder must ensure that the— (a) physical implementation of all the authorised listed activities, including the installation of bulk services and the construction of the top structures, is started with and concluded at the site; (b) construction monitoring and reporting requirements are undertaken at the site and submitted to the Competent Authority in time to allow said authority to process such documents timeously; (c) post construction rehabilitation and monitoring requirements is undertaken and completed at the site; and (d) environmental auditing requirements are complied with; and that such auditing is finalised in time to allow the competent authority to be able to process the environmental audits timeously within the specified validity period.	DEA&DP was notified of the intended commencement of work on January 24, 2024. Civil services commenced with work on the 1st of February 2024; thereafter, phases 1, 2 and 4 of the top structures were constructed. The ECO submits monthly monitoring reports to the Competent Authority. Noted. Rehabilitation of the riparian zone and surrounding natural area is ongoing. Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated June 2025, by the Managing Director of Springfield Estates (Pty) Ltd., represented by Mr José Rodrigues (the Applicant) as the independent environmental assessment practitioners to undertake an external compliance audit in fulfilment of Condition 17 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).
2.	The Holder must finalise the post construction rehabilitation and	Noted, Rehabilitation of the riparian zone and surrounding

	monitoring requirements within a period of 3-months from the date the development activity (construction phase) is concluded.	natural area is ongoing. Final rehabilitation monitoring will be audited later on.
3.	The Holder is authorised to undertake the listed activities specified in Section B above in accordance with the Preferred Alternative described in the Integrated Final Basic Assessment Report ("FBAR") and Final Impact Report dated 19 July 2023 on the site as described in Section C above. This Environmental Authorisation is only for the implementation of the Preferred Alternative which entails: The Holder is herein authorised to undertake the following activities that includes the listed activities as it relates to the transformation of land previously used for agriculture and the clearance of indigenous vegetation for the construction of the residential development and associated structures and infrastructure. The specific details of the proposed development on the property comprises of the following: • 299 units consisting of various housing types (19 units per Ha); • Internal roads; • Clubhouse; • Gatehouse; • Refuse area; • Internal open space areas to be used for recreational	Noted. All listed activities and the preferred alternative as set forth in the new EA in being implemented accordingly.

	activities/infrastructure. The development must be implemented in accordance with the layout developed by dhk architects (Pty) Ltd. (dated 07/11/2022) Drawing number 01-40-01 Rev H (Annexure 2).	
4.	This Environmental Authorisation may only be implemented in accordance with an approved Environmental Management Programme ("EMPr").	Noted. The Environmental Authorisation is being implemented in compliance with the approved Environmental Management Programme (EMPr), which guides all construction and environmental management activities on site.
5.	The Holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the Holder.	Noted. The holder remains responsible for all persons acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the Holder.
6.	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 final new EA was issued. The SDP footprint remains unchanged and number of units has been reduced to match the planning approval.
7.	The Holder must in writing, within 14 (fourteen) calendar days of the date of this decision– 7.1. notify all registered Interested and Affected Parties ("I&APs") of – 7.1.1. the decision reached on the application; 7.1.2. the reasons for the decision as included in Annexure 3;	The I&APs were notified of the new EA on the 26th of October 2023.

	7.1.3. the date of the decision; and 7.1.4. the date when the decision was issued. 7.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section G below; 7.3. draw the attention of all registered I&APs to the manner in which they may access the decision; 7.4. provide the registered I&APs with the: 7.4.1. name of the Holder (entity) of this Environmental Authorisation, 7.4.2. name of the responsible person for this Environmental Authorisation, 7.4.3. postal address of the Holder, 7.4.4. telephonic and fax details of the Holder, 7.4.5. e-mail address, if any, of the Holder, 7.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations (as amended). 7.5. 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. 7.6. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided (i.e., the listed activities), including site preparation, must not commence until the appeal is decided.	No appeals have been lodged against the EA.
8.	Seven calendar days' notice, in writing, must be given to the	DEA&DP was notified of the intended commencement of work

	Competent Authority before commencement of any activities. 8.1. The notice must make clear reference to the site details and EIA Reference number given above. 8.2. The notice must also include proof of compliance with the following conditions described herein: **Conditions no.: 7**, **10** and **12**	on January 24, 2024. Civil services commenced with work on the 1st of February 2024; thereafter, phases 1, 2 and 4 of the top structures were constructed. The notification made clear reference to the site details, EIA Reference, and proof of compliance. **Condition 7:** Notification of EA to I&APs – the notification of EA was sent to all registered Interested and Affected Parties, Stakeholders and Organs of State on the 26th of October 2023. No appeals received. **Condition 10:** The EMPr was approved by DEADP and required updates (adding the conditions of the EA and updating the Auditing schedule). **Condition 12:** Appointment of ECO – This is to confirm that HilLand Environmental is still the appointed ECO for the project.
9.	Seven calendar days' written notice must be given to the Competent Authority on completion of the construction activities.	Noted, construction is still in progress.
10.	The draft or Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation is herewith approved and must be implemented and adhered to. 10.1. The EMPr must be amended to incorporate the following — 10.1.1. Incorporate all the conditions given in this Environmental Authorisation; 10.1.2. Include the auditing schedule as set out by this Environmental Authorisation.	The final EMPr has incorporated the conditions of the EA and the auditing schedule.

11.	The EMPr must be included in all contract documentation for all phases of implementation.	The approved EMPr have been included in the contract documentation.
12.	The Holder must appoint a suitably experienced Environmental Control Officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation contained herein.	HilLand Environmental has been appointed, dated January 2024, as ECO on the site and submits monthly reports.
13.	The ECO must– 13.1. be appointed prior to commencement of any works (i.e. removal and movement of soil); 13.2. ensure compliance with the EMPr and the conditions contained herein; 13.3. keep record of all activities on the site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO; 13.4. remain employed until all development activities are concluded, and the post construction rehabilitation and monitoring requirements are finalised; and 13.5. the ECO must conduct site inspections at least every 2 (two) weeks and must submit ECO Monitoring Reports on a monthly basis to the competent authority.	Noted, HilLand Environmental conducted biweekly site visits during the installation of civil services. Monthly site visits are also conducted during the construction phase, and reports are submitted to the Competent Authority.
14.	A copy of the Environmental Authorisation, EMPr, any independent assessments of financial provision for rehabilitation and environmental liability, closure plans, audit reports and compliance monitoring reports must be kept at the site of the authorised activities and be made available to anyone on request, and where the Holder has website, such documents must be made available on such publicly accessible website.	The approved EMPr have been included in the contract documentation. Services are still being installed in Phase 7 of the development. During the site audit, no site camp/office was noted. According to the ECO, an environmental file was available at the site camp.

15.	Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.	Access to the site was gained via Providence Drive and the entrance at Urbans Boulevard.
16.	The Holder must, for the period during which the environmental authorisation and EMPr remain valid ensure the compliance with the conditions of the environmental authorisation and the EMPr, is audited.	Noted. Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated June 2025, by the Managing Director of Springfield Estates (Pty) Ltd., represented by Mr José Rodrigues (the Applicant) as the independent environmental assessment practitioners to undertake an external compliance audit in fulfilment of Condition 17 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).
17.	The frequency of auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr, must adhere to the following programme: 17.1. Auditing during the non-operational phase (construction activities): 17.1.1. During the period which the development activities have been commenced with on the site, the Holder must ensure annual environmental audit(s) are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority. 17.1.2. A final Environmental Audit Report for the construction phase (non-operational component) must be submitted to the Competent Authority within **three (3) months** of completion of the construction	Compliant. An environmental audit was conducted in July 2025, approximately one year after construction commenced on 1 February 2024, in accordance with the requirement that annual audits be undertaken and submitted to the Competent Authority during the construction period.

	phase.	
18.	The Environmental Audit Report(s), must– 18.1. be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise. Such person may not be the ECO or EAP who conducted the EIA process; 18.2. provide verifiable findings, in a structured and systematic manner, on– 18.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and 18.2.2. the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity. 18.3. identify and assess any new impacts and risks as a result of undertaking the activity; 18.4. evaluate the effectiveness of the EMPr; 18.5. identify shortcomings in the EMPr; 18.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 18.7. 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; 18.8. indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation;	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated June 2025, by the Managing Director of Springfield Estates (Pty) Ltd., represented by Mr José Rodrigues (the Applicant) as the independent environmental assessment practitioners to undertake an external compliance audit in fulfilment of Condition 17 of the Environmental Authorization (the EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended). Construction commenced on the 1st of February 2024. Civil services are being installed, the majority of stormwater, potable water, and sewage have been installed along with the electrical services. Rehabilitation of the riparian zone and surrounding natural buffer area is ongoing.

	18.9. include a photographic record of the site(s) applicable to the audit; and 18.10.be informed by the ECO reports.	
19.	The Holder must, within 7 calendar days of the submission of the 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 on a publicly accessible website (if applicable).	Noted.

ENVIRONMENTAL AUTHORISATION SPECIAL CONDITIONS AND COMPLIANCE

TABLE 3: SPECIAL ENVIRONMENTAL AUTHORISATION CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
20.	A development setback boundary of 30 metres along the edge of the Modderkloof/Modderrugrivier and surrounding the edge of dams/wetlands must be maintained free of any construction activities.	Wooden stakes have been used to clearly mark the development setback line along the Modderrug River buffer, ensuring compliance with the no-go zone requirements.
21.	The Stormwater Management Plan developed by SMEC, dated 17 May 2023, must be implemented on the site.	Stormwater is being actively managed on-site. During the civil services installations and construction of Phases 1, 2, and 4, a temporary stormwater attenuation pond was constructed in Phase 1.
22.	The area immediately south of the development abutting the Modderrug River must be managed as an open space area and must not be developed. Further to this— 22.1. No new buildings, structures or bulk engineering services infrastructure may be constructed/installed in this open space area within 32 metres from the edge Modderrug River, unless the necessary authorisation has been obtained. 22.2. A public walkway system must be established at least 32-metres away from the watercourse, in the open space system. The walkways must be able to accommodate wheelchairs, pedestrians and cyclists and be at least 2.0m in width. 22.3. No fencing may cross the river and the fencing must be restricted to the residential area.	 No new buildings, structures, or bulk services infrastructure have been constructed within 32 metres of the Modderrug River. The development setback line is clearly marked with stakes on site, and the area remains undisturbed, in compliance with the requirement to keep this zone free from development. While footpaths have been partially established within the open space area using woodchip mulch, a formal public walkway system accommodating wheelchairs, pedestrians, and cyclists, with a minimum width of 2.0m, has not yet been completed No fencing was observed crossing the Modderrug River.

	22.4. The Holder must ensure that all alien invasive plant species will be removed from the open space area within the specified validity period.	Initial alien invasive species clearing has been undertaken; however, regrowth of alien species was observed, particularly in Phase 8 following trench rehabilitation. Follow-up clearing is required to ensure ongoing compliance with this condition and to manage the open space area effectively within the validity period.
	22.5. A "Conservation Management Plan" (CMP) must be developed and implemented for the management of the Modderrug River open space during the validity period of this Environmental Authorisation. Such CMP must address and/or incorporate the following— (a) No planting except for rehabilitation in terms of an approved management plan. (b) The corridor must remain linked to form a green belt with adjacent properties with open space areas. (c) No collection or damaging of fauna and flora. (d) Financial provisions for the management and upkeep of the conservation area. **Note**: The CMP should be incorporated in the constitution of estate's Homeowners Association (HOA).	Noted and will be drafted at a later stage.
23.	Should any heritage remains be exposed during excavations or any other actions on the site(s), 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	No heritage remains were exposed during excavations as per the ECO reports provided, thus far.

	Resources Authority. 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 burials including grave goods and/or associated burial material.	

EA Compliance Rating	**100%**

SITE AUDIT FINDINGS

An external environmental audit was conducted on 1 July 2025 in accordance with the conditions of the Environmental Authorisation. Access to the site was gained via Providence Drive and the entrance at Urbans Boulevard.

Phases 1, 2, and 4 of the development have been completed towards the northern section of the site. Internal roads in Phases 1 through 5 have been fully paved, and curbing has been installed. As sidewalks have not been constructed, central stormwater channels have been implemented as an alternative for surface runoff management.

All services for Phases 1 through 5 have been successfully installed. Ongoing construction activities were observed towards the southern portion of the site, specifically in Phases 7 and 8, where contractors are currently engaged in service installations. Sewage connections have been completed, including tie-ins to the municipal line within the Modderrug River buffer zone. Footpaths, where applicable, have been partially established and mulched using woodchips. Cleared and levelled erven in Phases 3 and 5 have also been mulched and are awaiting vertical development. Similarly, several erven in Phases 1, 2, and 4 remain cleared and undeveloped.

Service trenches in Phase 8 have been rehabilitated to the satisfaction of the Environmental Control Officer (ECO), although some alien invasive plant species were noted. Follow-up alien clearing in these areas is recommended. Landscaping of the completed phases and the area outside the main entrance has been undertaken using indigenous vegetation, in line with the approved Landscaping Plan.

The existing dam on site is in good condition and has been maintained free of debris; it will form part of the stormwater retention system. The natural areas adjacent to the development remain undisturbed and free from construction waste. Wooden stakes have been used to clearly mark the development setback line along the Modderrug River buffer, ensuring compliance with the no-go zone requirements.

Stockpiles of topsoil and subsoil from cleared erven and roads have been placed within the footprint of Phase 7, towards the southern boundary of the site. These stockpiles show signs of vegetative regrowth, which assists in dust suppression and limits dust fallout during the construction of adjacent phases. However, alien vegetation was observed on the majority of these stockpiles, which will require targeted removal. In addition, the stockpiles have not been adequately demarcated, and no clear distinction can be made between the topsoil and subsoil layers. This may compromise the quality and usability of the topsoil for future rehabilitation or landscaping activities. It is recommended that the stockpiles be properly identified, separated, and managed to prevent further contamination or degradation.

Green shade netting has been used effectively to screen the development from adjacent residential estates, as well as between active construction areas and completed phases (specifically adjacent

to Phases 1, 2, and 4). A chemical toilet and a lockable storage container were observed on-site and located appropriately within the designated work area, contributing to orderly site management and compliance.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 4: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	**Biodiversity**	
1.1	All pathways and recreational use in the riparian rehabilitation zone are to be limited and designed to follow contours, limit erosion and control use so that it will not result in damage.	The partially established footpaths within the riparian rehabilitation zone have been mulched with woodchips, which assists in erosion control and temporary stabilisation. Pathway design should be finalised in accordance with the requirements for low-impact, controlled use to avoid degradation of the riparian zone.
1.2	Ongoing maintenance of the open space area through alien clearing and management of pathways and rehabilitation.	Alien vegetation was observed within the open space and on several stockpiles, indicating that follow-up clearing is necessary. Footpaths have been partially established and mulched, but continued management is required to ensure they align with rehabilitation goals and prevent erosion.
1.3	Plant rescue in the development area of the few remaining indigenous species to be used in the rehabilitation and landscaping areas.	Indigenous landscaping has already been implemented outside the entrance and completed residential phases.
1.4	Restoration and rehabilitation of the riparian corridor to recreate a riparian buffer zone of indigenous vegetation.	Noted. Restoration and rehabilitation of the riparian corridor will be carried out progressively, with alien vegetation systematically removed and indigenous vegetation planted to re-establish a functional riparian buffer zone.
1.5	Rescue and stockpile topsoil from the construction areas to use for rehabilitation and landscaping.	Noted. While topsoil has been stockpiled for future rehabilitation and landscaping, alien vegetation has established on most of the stockpiles, and there is currently no clear demarcation between topsoil and subsoil.

2.	**Soil Erosion**	
2.1	SUDS principles in stormwater management limit concentration of stormwater and encourage infiltration of water back into the soil profile.	The central stormwater channels installed in Phases 1 through 5 align with SUDS principles by managing runoff effectively, reducing flow concentration, and promoting infiltration, thereby supporting sustainable stormwater management on site.
2.2	Cover or protect areas susceptible to erosion and implement erosion mitigation measures such as silt fencing, hay bales, swales, sandbags, or other methods to slow water and allow sediment to settle before being carried away.	During the installation of services, a row of sandbags has been placed along the southern side slope to prevent any silt wash.
2.3	Limit disturbance only to areas where services are being installed to reduce unnecessary exposed surfaces vulnerable to erosion; implement phased development where possible.	Services have been installed in Phases 1 through 5, with ongoing installations in Phases 7 and 8. Cleared areas in Phases 3 and 5 have been mulched to minimise erosion risk, supporting phased development and limiting disturbance to active work zones.
2.4	Stabilise and landscape all disturbed areas immediately after construction, to the satisfaction of the ECO, in order to minimise soil exposure.	Service trenches, particularly in Phase 8, have been rehabilitated to the satisfaction of the ECO. Additionally, cleared erven in Phases 3 and 5 have been mulched to further protect exposed soil.
2.5	During alien vegetation clearing, avoid disturbing the soil and do not remove the roots of alien trees to prevent unnecessary soil exposure and erosion.	Noted. Restoration and rehabilitation of the riparian corridor will be carried out progressively, with alien vegetation systematically removed and indigenous vegetation planted to re-establish a functional riparian buffer zone.
2.6	Minimise vegetation clearing wherever possible to reduce silt movement and erosion risk.	Vegetation clearing has been limited to only the immediate areas required for construction activities. Additionally, sandbags have been used effectively in erosion control measures to slow water flow and protect exposed soils
2.7	Apply stringent mitigation measures during construction to limit surface runoff, silt dispersal, and contamination—especially near the riparian buffer area.	During the installation of services, a row of sandbags has been placed along the southern side slope to prevent any silt wash.

2.8	Use silt fencing, onion bags, mulch, brushwood, sandbags, and deflection berms in all exposed areas as required, depending on site conditions.	Sandbags and mulch have been employed in exposed areas to effectively slow water flow, reduce erosion, and promote sediment deposition.
2.9	Identify areas requiring erosion control in consultation with the ECO; implement all erosion mitigation instructions issued by the ECO.	No erosion was observed during the site audit.
2.10	The contractor is liable for any erosion or siltation damage, including a fine, full clean-up, and restoration of the site to the ECO's satisfaction.	No erosion was observed during the site audit or siltation damage.
2.11	Secure all construction materials at pre-approved stockpile locations surrounded by silt protection barriers to prevent runoff and contamination.	All construction materials have been stored in lockable containers either within the designated site camp or near active work areas. During the site visit, a single storage container was observed positioned near the current works area.
2.12	In case of contaminated runoff, install sandbags to contain flow and clean affected areas immediately after rainfall to prevent pollution of the Modderrug River or surrounding open space.	Sandbags have been installed throughout the various development phases, as noted in the ECO reports, to contain runoff and prevent contamination.
2.13	Contractors working in trenches must ensure proper protection from rainwater runoff using sandbags, mulch bags, or similar methods to slow water flow and prevent damage.	Sandbags have been installed throughout the various development phases, as noted in the ECO reports, to contain runoff and prevent contamination.
2.14	Monitor all construction work against the EMPr, with specific focus on: • Retaining surface runoff until attenuation areas are fully functional. • Preventing debris and silt accumulation during heavy rain. • Controlling dust generation during construction. • Constructing the stormwater attenuation pond as early as possible.	No extreme surface runoff or silt deposits were observed during the site audit. During the initial construction of Phases 1, 2, and 4, along with the civil services installations, a water truck was available on-site for dust suppression, as per the ECO reports.

	• Initiating and completing landscaping promptly. • Properly demarcating all no-go areas as required by the EMPr.	
3. 3.1	**Pollution** Ensure all vehicles and machinery are well-maintained to prevent leaks and mechanical failure.	An excavator was present on site during the site audit, and appeared to be in good condition.
3.2	Place drip trays under all vehicles and machinery when stationed at the camp site to catch potential leaks.	No vehicles or machinery other than the excavator were observed during the site audit. The majority of the services have been installed. Top structure of the remaining development phases is yet to continue.
3.3	Immediately repair any construction vehicle that develops a leak or remove it from site until the leak is resolved.	An excavator was present on site during the site audit, and appeared to be in good condition.
3.4	Maintain ablution facilities in good working order and ensure they are emptied regularly.	A single chemical toilet is available at the current works area, and according to the ECO reports, all ablution facilities were serviced regularly.
3.5	Implement strict litter control measures during both construction and operational phases.	The ECO issued a non-compliance to the contractor at the beginning of the construction period due to excessive litter on site. Since then, as per the ECO reports, chicken parades were regularly coordinated.
3.6	Mix cement or concrete only on impermeable surfaces; concrete batching areas must be bunded to contain spills and prevent runoff.	No cement batching was active during the site audit.
3.7	Do not wash ready-mix trucks on site.	No cement batching was active during the site audit.
4. 4.1	**Vegetation Clearance and Plant Rescue** Vegetation must only be cleared within the immediate working area for the current phase under construction to retain soil cover and minimize erosion.	Noted. Vegetation clearing has been limited to areas under active development, and cleared erven in Phases 3, 5, and parts of 1, 2, and 4 have been mulched with woodchips.
4.2	Demarcate the working area clearly and install no-go fencing	Wooden stakes have been installed on site to clearly demarcate

	between the working zone and the riparian open space to the south, as indicated on the no-go map.	the development setback line along the Modderrug River buffer, ensuring compliance with the no-go zone requirements. A shade net should be considered when Phases 7 and 8 are cleared for top structure construction.
4.3	Restrict all construction activities strictly to the demarcated working zone.	Noted. No issues were reported by the ECO.
4.4	No work may begin in any phase until the required hay bale protective screen has been installed along the buffer zone.	Sandbags have been installed throughout the various development phases, as noted in the ECO reports, to contain runoff and prevent contamination.
4.5	Conduct a plant rescue prior to any vegetation clearing. The ECO must advise which plants require transplanting in each phase.	According to the ECO reports, plant search and rescue is done as vegetation clearing progresses.
4.6	Maintain a record of all rescued plants.	According to the ECO report, the records were available in the environmental file. As the site camp has been dismantled, no such file or records were obtained during the site audit.
4.7	Store rescued plants in the on-site nursery located within the working zone or replant them directly into the rehabilitation zone along the Modderrug River.	Rehabilitation of the riparian zone is ongoing. The rescued plants were systematically reintroduced and replanted along the Modderrug River.
4.8	For each successful transplant, remove a sod with the plant and its roots intact and replant accordingly.	No reporting on this matter was provided.
4.9	Mow the grass area after the plant rescue but before clearing begins to reduce biomass; the resulting mulch must be collected with the topsoil.	Mowing is to be carried out in a phased manner, immediately prior to construction commencing in each specific section. No mowing was observed during the site audit as snag items were being completed.
4.10	Continue alien vegetation clearing within the riparian area.	Alien vegetation was observed in the rehabilitated areas where services were installed, particularly in Phase 8.
4.11	If any endangered or protected species (as listed in Annexure K) are found during clearance, do not remove them without the	Noted, no SCCs or protected tree species were recorded by the ECO.

	required permits under the Western Cape Nature Conservation Laws Amendment Act (Act No. 3 of 2000) or the National Forests Act (Act No. 84 of 1998).	
5. 5.1	**Fauna** Avoid the removal, damage, or disturbance of any animals within the construction area.	No animals have been reported to be removed or harmed during construction.
5.2	If any animal becomes trapped or caught in the construction area, immediately contact the ECO for assistance (e.g., relocating snakes from trenches).	No animals have been reported to be removed or harmed during construction.
5.3	Ensure all employees are informed of the importance of preventing harm to wildlife as a result of construction activities.	Strict policies are in place regarding snake handling
5.4	Prohibit all hunting, trapping, shooting, poisoning, or other forms of disturbance to fauna on or near the site.	No animals have been reported to be removed or harmed during construction.
5.5	Do not enter the riparian area unless performing a task specifically required in that zone.	Wooden stakes have been placed to clearly demarcate the development setback line and designated no-go area. No construction activities have taken place within this zone, other than the installation of the municipal service connection. Additionally, some footpaths within the riparian zone have been mulched to support rehabilitation and limit erosion.
6. 6.1	**Topsoil** Strip and stockpile topsoil from all construction areas before work begins; ECO to advise on approved stockpile locations within the development zone—no stockpiling in the buffer area along the Modderrug River.	No stockpiling was observed within the buffer area; however, the current stockpile location was not advised by the ECO. Stockpiles of topsoil and subsoil from cleared erven and roads have been placed within the footprint of Phase 7, towards the southern boundary of the site. These stockpiles exhibit vegetative regrowth, which aids in dust suppression and reduces dust fallout during the construction of adjacent phases. Nonetheless, alien vegetation was observed on the majority of these stockpiles and will require

		targeted removal. Additionally, the stockpiles have not been adequately demarcated, and no clear distinction exists between the topsoil and subsoil layers. This may affect the quality and usability of the topsoil for future rehabilitation or landscaping. It is recommended that the stockpiles be clearly identified, separated, and properly managed to prevent further contamination or degradation.
6.2	Disturbance of vegetation and topsoil must follow a phased programme in approved areas only when construction in that area is due to begin, to avoid erosion risk.	Evident site findings show that clearing and mulching of erven are progressing in line with active construction phases
6.3	Stockpiled topsoil must be reserved for rehabilitation and landscaping and kept free from contamination with subsoil or construction materials.	Stockpiles of topsoil and subsoil from cleared erven and roads have been placed within the footprint of Phase 7, towards the southern boundary of the site. These stockpiles exhibit vegetative regrowth, which aids in dust suppression and reduces dust fallout during the construction of adjacent phases. Nonetheless, alien vegetation was observed on the majority of these stockpiles and will require targeted removal. Additionally, the stockpiles have not been adequately demarcated, and no clear distinction exists between the topsoil and subsoil layers. This may affect the quality and usability of the topsoil for future rehabilitation or landscaping. It is recommended that the stockpiles be clearly identified, separated, and properly managed to prevent further contamination or degradation.
6.4	Where feasible, place topsoil directly into final landscaping areas or swales to avoid double handling and allow soil to settle naturally.	Topsoil was reused during the ongoing levelling and rehabilitation of the area throughout construction.
6.5	Landscape berms and swales must be shaped to final form before soil hardens and must be vegetated with a cover crop, followed by indigenous landscaping species.	Berms and swales will be created and shaped once construction within Phase 8 continues and the retention pond is utilised.

6.6	Topsoil may only be removed from site with written approval from the ECO.	Noted. No topsoil has been disposed of off-site.
6.7	Remove and stockpile vegetation roots and surface organic matter along with topsoil for use in the rehabilitation phase.	No such stockpiles were observed during the site audit.
6.8	Protect topsoil stockpiles from erosion; allow vegetation to grow to stabilise them, but remove any alien invasive species that appear.	No erosion was observed during the site audit. These stockpiles exhibit vegetative regrowth, which aids in dust suppression and reduces dust fallout during the construction of adjacent phases. Nonetheless, alien vegetation was observed on the majority of these stockpiles and will require targeted removal.
6.9	Soil excavated for underground services must be separated—topsoil on one side, subsoil on the other—and replaced in the correct order to promote regrowth.	The majority of the services were installed prior to the site audit. The remaining manholes were being installed during the site audit. As per the ECO reports, topsoil and subsoil were separately placed on the side of the trenches as required.
6.10	Do not begin topsoil stripping until the plant rescue programme has been completed.	Compliant. All bulb species were recues prior to clearance.
6.11	Any surplus subsoil needed for cut and fill operations must be stored in an ECO-approved stockpile area.	Stockpiles of topsoil and subsoil from cleared erven and roads have been placed within the footprint of Phase 7, towards the southern boundary of the site. These stockpiles exhibit vegetative regrowth, which aids in dust suppression and reduces dust fallout during the construction of adjacent phases. Nonetheless, alien vegetation was observed on the majority of these stockpiles and will require targeted removal. Additionally, the stockpiles have not been adequately demarcated, and no clear distinction exists between the topsoil and subsoil layers. This may affect the quality and usability of the topsoil for future rehabilitation or landscaping. It is recommended that the stockpiles be clearly identified, separated, and properly managed to prevent further contamination or degradation.

6.12	All stockpiles must be screened and protected from both wind and water erosion; no spillage into the riparian buffer area is allowed.	Stockpiles of topsoil and subsoil from cleared erven and roads have been placed within the footprint of Phase 7, towards the southern boundary of the site. These stockpiles exhibit vegetative regrowth, which aids in dust suppression and reduces dust fallout during the construction of adjacent phases. Nonetheless, alien vegetation was observed on the majority of these stockpiles and will require targeted removal. Additionally, the stockpiles have not been adequately demarcated, and no clear distinction exists between the topsoil and subsoil layers. This may affect the quality and usability of the topsoil for future rehabilitation or landscaping. It is recommended that the stockpiles be clearly identified, separated, and properly managed to prevent further contamination or degradation.
6.13	Install silt fencing before construction begins, especially between the development and riparian zones, to prevent silt from leaving the site.	Sandbags have been installed throughout the various development phases, as noted in the ECO reports, to contain runoff and prevent contamination.
7. 7.1	**Environmental Induction** All civil construction and building staff, including contractors, must attend an environmental induction and education programme conducted by the ECO prior to commencing any site activities, with records of attendance and training content to be kept.	Regular toolbox talks and environmental inductions were performed during the installation of services and construction.
8. 8.1	**Method Statements** Before the contractor(s) begins each construction activity the Contractor and Site Agent shall, prior to the commencement of such activity involving construction, maintenance or rehabilitation, give the ECO a written plan / discuss and approve at sitemeetings the following: • Location of the construction camp	The following method statement was provided to the ECO. • Demarcation and handling of stockpiles. All other required method statements were verbally confirmed and provided to the ECO on request as development progressed.

	• Storage of construction materials and hazardous substances (if any) o Location of the stockpile sites for the top 30cm of topsoil (required in windrows in and around each phase for use in the rehabilitation and landscaping) • Location of any stockpile sites for subsoil or plan for removal from site • Solid waste plan • Wastewater plan • Erosion and sedimentation control plan • Fire control • Protection of natural features • Cement and concrete batching plan	
9. 9.1	**Traffic** Restrict all construction vehicle movement to designated roads; any temporary haul roads must receive prior approval from the ECO.	Access to the site for construction vehicles are via Providence Drive.
9.2	Ensure that all contractors comply with the EMPr and follow any construction access routes designated by the developer and/or HOA rules of conduct.	Noted and compliant as per the ECO reports.
9.3	Monitor all access to the site throughout the construction period.	An access control gate has been constructed to monitor access to the site.
9.4	Ensure vehicles leaving the site are clean and do not deposit mud, soil, or concrete onto public roads; if spillage occurs, clean the affected areas daily and prevent materials from entering the stormwater system.	Providence Drive appeared clean and free from debris.
9.5	During construction of the residential development and new entrance, manage traffic flow with proper signage and clear	An access control gate has been constructed to monitor access to the site.

	demarcation of both the work zone and the routes that vehicles must follow, especially to ensure the safety of surrounding developments.	
10.	**Demarcation of No-Go Area**	
10.1	The southern open space riparian buffer area is a strict NO-GO zone; no construction may impact this area—only rehabilitation activities, including alien clearing, are permitted.	Wooden stakes have been used to clearly mark the development setback line along the Modderrug River buffer, ensuring compliance with the no-go zone requirements.
10.2	No activities may take place beyond the designated NO-GO boundary without ECO approval and an approved Method Statement.	The only activities that have taken place were the required alien clearing and establishment of some of the footpaths and mulching thereof during the clearing.
10.3	All site personnel must be made aware of the boundaries within which they are allowed to work.	During the environmental induction sessions, this is established.
10.4	Each contractor must be informed of the specific extent of their work area and must remain within that area at all times.	Only work within the development footprint has taken place, other than that of the municipal sewer connections.
10.5	During civil construction, all areas not actively under construction are considered NO-GO zones.	Noted. Wooden stakes have been used to clearly mark the development setback line along the Modderrug River buffer, ensuring compliance with the no-go zone requirements.
10.6	During construction of top structures, the entire site is considered a NO-GO zone except for the portion officially handed over to the specific builder(s).	Noted, the work areas were screened during the construction of the top structures as per the ECO reports.
10.7	All areas outside the defined works (roads, pipeline routes, and building platforms) are designated as NO-GO zones for both civil and building contractors.	Noted. Wooden stakes have been used to clearly mark the development setback line along the Modderrug River buffer, ensuring compliance with the no-go zone requirements. The work areas were also screened during the construction of the top structures as per the ECO reports.
10.8	Limit disturbance within work areas, as all disturbed areas must be stabilized with topsoil and re-seeded upon completion of the	Disturbed areas, particularly along the civil services installation route and cleared erven, have been levelled, rehabilitated and

	contractor's work.	mulched. Topsoil was reused on-site as construction progressed, aiding in stabilisation.
10.9	Restrict all construction activities to clearly demarcated areas to prevent further disturbance to surrounding vegetation.	Wooden stakes and screening had been used to delineate the development setback line, particularly along the riparian buffer, and construction area.
10.10	No encroachment or activity is permitted outside of the designated work areas.	No encroachment into the riparian buffer or surrounding natural areas had been observed.
10.11	Storage areas for construction materials and access routes must be approved by the ECO before use, and these areas must be rehabilitated afterward.	Construction materials had been stored in a lockable container near the active works area. However, the location of the current stockpiles had not been advised by the ECO and would require formal demarcation and eventual rehabilitation.
10.12	Contractors are responsible for clearly demarcating NO-GO areas so they are visible at all times to all personnel.	No-go areas, especially within the Modderrug River buffer, had been clearly demarcated using wooden stakes and remained visible to all personnel throughout construction.
10.13	Methods of demarcation must be approved by the ECO and may include danger tape, rope, fencing, shade cloth, mulch bags, or wire fencing, depending on the nature of the work.	Various ECO-compliant demarcation methods had been used, including wooden stakes, shade netting between phases, and sandbags for erosion control in active construction zones.
11. 11.1	**Construction Site Camp** Provide chemical ablution facilities at the campsite at a ratio of one toilet per 15 staff, to be installed before site activities commence.	An adequate number of chemical toilets have been provided adjacent to the works area.
11.2	Establish a dedicated area within the campsite for refuse and waste management; all waste must be disposed of at approved waste disposal sites.	Since only snag items are still being carried out, the site camp has been dismantled and rehabilitated, and no active waste management was present on-site during the site audit.
11.3	Prohibit on-site accommodation for contractors and staff during construction, except for a night watchman.	No accommodation is provided.
11.4	Prohibit open fires on site; all potential ignition sources must be removed from the property at the end of each day.	No evidence of fires was observed during the site audit.

11.5	Store all contract-related materials within the designated campsite or other ECO-approved areas.	Contract-related materials can be obtained within the lockable container during the site audit.
11.6	Obtain ECO approval before utilizing any concrete batching plant areas, which must have settling ponds and trapping systems to prevent contaminated water leaving the site; batching plants should be located at least 50m from the top of steep slopes.	No cement batching was active during the site audit.
11.7	Prohibit ready-mix trucks from rinsing tanks on site or along access roads; any spillage must be immediately cleaned by the responsible party.	No cement batching was active during the site audit.
11.8	Ban the use of temporary diesel storage tanks on site.	No diesel storage tanks were observed during the site audit.
11.9	Erect adequate safety signage at the construction site to ensure compliance with safety regulations.	Manholes and excavations were screened during orange and yellow netting, but stockpiles were not adequately demarcated.
12. 12.1	**Storage of Construction Material** Demarcate all stockpile sites within the development area using silt fences and/or danger tape where necessary.	Stockpiles of topsoil and subsoil from cleared erven and roads have been placed within the footprint of Phase 7, towards the southern boundary of the site. These stockpiles exhibit vegetative regrowth, which aids in dust suppression and reduces dust fallout during the construction of adjacent phases. Nonetheless, alien vegetation was observed on the majority of these stockpiles and will require targeted removal. Additionally, the stockpiles have not been adequately demarcated, and no clear distinction exists between the topsoil and subsoil layers. This may affect the quality and usability of the topsoil for future rehabilitation or landscaping. It is recommended that the stockpiles be clearly identified, separated, and properly managed to prevent further contamination or degradation.
12.2	Implement silt protection measures around stockpile sites as required to prevent sediment runoff.	No sandbags were observed during the site audit. The majority of the sites where civil services have been installed were rehabilitated towards the south. Vegetation regrowth was

		observed on the stockpiles, and no erosion was present.
12.3	Store all construction materials within the site camp or development boundary where space permits.	No construction materials were observed during the site audit. A lockable container was present at the current works area. The site camp has been dismantled and the area rehabilitated.
12.4	Do not store construction materials outside the site camp or development area without written permission from the landowner, HOA, and ECO.	No construction materials were observed during the site audit. A lockable container was present at the current works area. The site camp has been dismantled and the area rehabilitated.
12.5	Prohibit storage of construction materials on steep slopes near open space areas.	No construction debris was noted in the riparian zone.
12.6	Do not store hazardous materials such as diesel or petrol on site without written approval from DEADP.	No diesel or petrol bowsers were observed during the site audit.
12.7	Remove any bulk earthworks material not used for cut and fill immediately to an approved disposal site; temporary storage of cut material must be agreed with the ECO and remain within the development footprint.	Stockpiles of topsoil and subsoil from cleared erven and roads have been placed within the footprint of Phase 7, towards the southern boundary of the site. Additionally, the stockpiles have not been adequately demarcated, and no clear distinction exists between the topsoil and subsoil layers. This may affect the quality and usability of the topsoil for future rehabilitation or landscaping. It is recommended that the stockpiles be clearly identified, separated, and properly managed to prevent further contamination or degradation.
13.	**Fires**	
13.1	All personnel must be trained on fire danger awareness and emergency procedures.	The site camp has been dismantled, only snag items are being taken care of, and appropriate firefighting equipment will be present in the storage container near the final works area.
13.2	Open fires and naked flames for heating or cooking are prohibited anywhere on site.	No evidence of fires was observed during the site audit.
13.3	Cigarettes must not be disposed of on-site and should be placed	No cigarette buds were observed during the site audit.

	only in designated receptacles.	
13.4	**The Contractor shall ensure that there is appropriate fire-fighting equipment available on site at all times.**	The site camp has been dismantled, only snag items are being taken care of, and appropriate firefighting equipment will be present in the storage container near the final works area.
14.	**Waste Management**	
14.1	Implement an integrated waste management approach focusing on waste minimisation through reduction, recycling, reuse, and proper disposal using only approved methods.	A final manhole was in the process of being installed, along with the completion of snag items and rehabilitation of the former site camp area, which had already been dismantled; no other construction activities were underway at the time of the site audit, and no waste management skips or bins were observed on-site.
14.2	Ensure all site personnel are instructed on proper waste disposal procedures.	A final manhole was in the process of being installed, along with the completion of snag items and rehabilitation of the former site camp area, which had already been dismantled; no other construction activities were underway at the time of the site audit, and no waste management skips or bins were observed on-site.
14.3	Provide sufficient disposal facilities on site.	A final manhole was in the process of being installed, along with the completion of snag items and rehabilitation of the former site camp area, which had already been dismantled; no other construction activities were underway at the time of the site audit, and no waste management skips or bins were observed on-site.
14.4	Encourage recycling by providing clearly marked recycling bins.	A final manhole was in the process of being installed, along with the completion of snag items and rehabilitation of the former site camp area, which had already been dismantled; no other construction activities were underway at the time of the site audit, and no waste management skips or bins were observed on-site.
14.5	Dispose of all waste materials only at suitable, approved facilities; dumping on or off site is prohibited.	A final manhole was in the process of being installed, along with the completion of snag items and rehabilitation of the former site camp area, which had already been dismantled; no other

		construction activities were underway at the time of the site audit, and no waste management skips or bins were observed on-site.
14.6	Keep documentary evidence of all disposed contaminated products, waste, or residues generated during construction.	A final manhole was in the process of being installed, along with the completion of snag items and rehabilitation of the former site camp area, which had already been dismantled; no other construction activities were underway at the time of the site audit, and no waste management skips or bins were observed on-site.
14.7	Maintain the site in a neat, tidy condition, free of litter including in open space areas.	No litter was observed during the site audit.
14.8	Provide litter bins, containers, and refuse collection facilities at all work areas; remove litter daily before site closure.	A final manhole was in the process of being installed, along with the completion of snag items and rehabilitation of the former site camp area, which had already been dismantled; no other construction activities were underway at the time of the site audit, and no waste management skips or bins were observed on-site.
14.9	Store solid waste temporarily only in ECO-approved designated areas prior to collection.	A final manhole was in the process of being installed, along with the completion of snag items and rehabilitation of the former site camp area, which had already been dismantled; no other construction activities were underway at the time of the site audit, and no waste management skips or bins were observed on-site.
14.10	Remove solid waste from site weekly to a licensed municipal waste site.	A final manhole was in the process of being installed, along with the completion of snag items and rehabilitation of the former site camp area, which had already been dismantled; no other construction activities were underway at the time of the site audit, and no waste management skips or bins were observed on-site.
14.11	Use covered, tip-proof, weatherproof, and scavenger-proof waste containers; fence waste storage areas to prevent wind-blown litter.	A final manhole was in the process of being installed, along with the completion of snag items and rehabilitation of the former site camp area, which had already been dismantled; no other construction activities were underway at the time of the site audit,

		and no waste management skips or bins were observed on-site.
15. 15.1	**Ablution Facilities** Ensure toilets are neat, have doors and locks, and are secured to prevent tipping over.	A chemical toilet is in place surrounding the work area.
15.2	Sanitation provision and servicing must meet the satisfaction of the ECO.	The chemical toilet appeared to be in a good hygienic condition.
15.3	Regularly empty toilets, including before weekends and public holidays.	According to the ECO, chemical toilets were regularly serviced.
15.4	Prohibit use of vegetation for sanitation on or off-site; violations will incur maximum fines and require cleanup by the contractor.	No evidence was observed of construction personnel misusing surrounding vegetation for sanitation purposes.
16. 16.1	**Concrete and Cement Works** Do not locate concrete mixing or batching areas within 50m of the top of slopes leading to the Modderrug River.	No cement batching took place during the site audit.
16.2	Clearly define and demarcate all concrete mixing areas on-site.	No cement batching took place during the site audit.
16.3	Concrete must be mixed only in bunded batching areas with impermeable bases; sandbag walls are recommended for bunding.	No cement batching took place during the site audit.
16.4	Mixing on soil is prohibited; use trays, thick plastic, or ready-mix from batching areas only.	No cement batching took place during the site audit.
16.5	Dispose of contaminated soil from bunds at municipal waste disposal sites.	No cement batching took place during the site audit.
16.6	Prevent spills from ready-mix trucks during offloading.	No cement batching took place during the site audit.
16.7	Cement-contaminated water must not enter open spaces or water bodies.	No cement-contaminated water was observed during the site audit.
16.8	Contractors must ensure used cement bags do not cause litter.	No empty cement bags were observed on-site
16.9	Remove and properly dispose of cement or concrete contaminated soil.	No cement spills were observed during the site audit.
16.10	Excess or spilled concrete must be disposed of at a registered	No cement spills were observed during the site audit.

	landfill site.	
16.11	Do not source water for cement mixing from any river system, including the Modderrug River.	No cement batching took place during the site audit.
16.12	Prevent cement-contaminated water from entering the stormwater system through effective bunding.	No cement batching took place during the site audit.
16.13	Bunding through the use of sandbag walls around any mixing areas is recommended, together with an impermeable base.	No cement batching took place during the site audit.
17.	**Noise and Dust**	
17.1	Limit civil construction work to normal working hours as specified by the local authority.	Working hours have been kept by the construction team according to the ECO.
17.2	Implement dust mitigation measures as needed, such as water spraying on gravel roads and exposed areas.	A water truck was available on-site for the required dust suppression.
17.3	Use wood chips or other coverings on haul roads and exposed surfaces to reduce dust generation.	Cleared and undeveloped erven have been mulched with woodchips.
18.	**Rehabilitation**	
18.1	All disturbed areas resulting from civil construction must be rehabilitated to the satisfaction of the ECO.	Disturbed areas resulting from civil construction were progressively rehabilitated to the satisfaction of the ECO, with methods appropriate to the site conditions.
18.2	Rehabilitation may include erosion control measures such as sandbags, mulch bags, indigenous grass seeding, or use of indigenous sods, as advised by the ECO.	Erosion control measures such as sandbags and mulch were implemented in exposed areas, particularly around service trenches and during the rehabilitation of the pipeline installation section.
18.3	The ECO must determine site-specific rehabilitation measures based on the conditions of each area.	The ECO advised on site-specific rehabilitation approaches; in several areas, woodchip mulch and vegetative regrowth were used to assist with stabilisation.
18.4	No bare or exposed area may remain unrehabilitated for longer than 2 months. If construction in that area is delayed beyond 2	Cleared erven and footpaths were mulched as construction progressed, ensuring soil cover and minimising erosion risks.

	months, it must be stabilised immediately and maintained until construction resumes.	
18.5	Protect the stormwater system by installing additional silt fencing and re-vegetating exposed areas. Erosion protection must be maintained as construction progresses and surface runoff patterns change.	Sandbags and silt fences were installed during service installations and top structure construction. Central stormwater channels were also constructed at the residential areas, where roads have been constructed to ensure sufficient stormwater runoff practices.
18.6	Clear all silt traps weekly during construction to ensure continued functionality.	According to the ECO reports, silt fences were installed during service installations and top structure construction and appropriately maintained.
18.7	On completion of any construction area, full rehabilitation must be undertaken, including: • Removal and proper disposal of all building rubble at an approved landfill site. • Raking compacted topsoil to loosen it. • Removal and disposal of contaminated soil at an approved landfill. • Returning stockpiled topsoil to the area. • Reinstating vegetation according to the approved Landscape Master Plan. • Applying additional erosion control methods if required by the ECO. • Maintaining the SUDS stormwater system at all time.	Rehabilitation included the return of topsoil, re-mulching, and the removal of waste materials from the site. Alien clearing did take place, although stockpiles and rehabilitated areas contained alien vegetation, which must be removed. Landscaping outside the entrance and around completed residences was undertaken using indigenous vegetation, in line with the approved Landscaping Plan. The SUDS stormwater system, including central channels, was functional and maintained, helping to manage surface runoff and support infiltration.
18.8	Any damage to private property or the southern open space must be reinstated to its original condition, to the satisfaction of both the landowner and the ECO.	No incidents of damage to private property or the adjacent southern open space were noted.
18.9	The open space along the Modderrug River will be rehabilitated	The riparian buffer zone was clearly marked with wooden stakes

	from alien-dominated vegetation to indigenous riparian thicket and forest, through a phased process undertaken by the developer and HOA.	to delineate the development setback line. Mulching of footpaths and rehabilitation within this zone have begun, and clearing of alien vegetation is proceeding systematically. Indigenous revegetation will follow.
18.10	Only the alien clearing and rehabilitation contractors are allowed to work in the riparian “no-go” area, under ECO supervision.	Only alien clearing and rehabilitation teams operated within the riparian buffer zone, along with the municipal sewer connections.
18.11	A pedestrian trail may be installed using shredded wood and log edges, set out on contour to prevent erosion. No vehicle access is allowed in the riparian corridor.	No pedestrian trail has yet been installed in the riparian corridor, though mulching of informal footpaths has occurred in preparation for this.

EMPr Compliance Rating	**96.83%**

CONCLUSION

In conclusion, an Environmental Authorisation (EA) was initially granted on 24 November 2008 under DEA&DP reference EG12/2/1-AG3-5516. This EA has since been amended by way of replacement, and a new Environmental Authorisation has been issued (DEADP Ref. 16/3/3/1/D2/19/0007/23). The competent authority (DEA&DP) grants this amendment by replacing the existing valid Environmental Authorisation with the new Environmental Authorisation. A single Environmental Authorisation is thus issued in the name of the Applicant, covering all aspects for which authorisation has been granted.

The external environmental audit conducted on 1 July 2025 confirms that the applicant is generally compliant with the conditions of the EA and the Environmental Management Programme (EMPr). The EMPr has proven effective in mitigating and guiding the environmental impacts of the ongoing construction activities.

The development is progressing in accordance with the approved plans, with substantial completion of the northern phases and active construction continuing in the southern sections. Infrastructure and landscaping works are largely compliant, and measures are in place to manage stormwater and protect sensitive environmental areas. However, attention is required regarding the presence of alien vegetation, the management of topsoil and subsoil stockpiles, and the need for ongoing maintenance within the Modderrug River buffer.

No major environmental risks or unmanaged impacts were identified that would warrant triggering a public participation process in terms of Regulation 34(5) of the EIA Regulations. As such, no further public engagement will be undertaken at this stage.

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:

Renier Kapp
for KAPPEC

ANNEXURE A – SITE PHOTOGRAPHS

Landscaping with indigenous vegetation at the entrance of the site.

Screening surrounding the development area. Screening of the completed residents.

Cleared area for residential units mulched with woodchips.

Condition of the first completed residential phase.

Landscaping with indigenous vegetation surrounding the residential units.

Condition of the first completed residential phase with screening in place.

<table>
<tr>
<td> 
Landscaping with indigenous vegetation surrounding the residential units.</td>
<td> 
Cleared area for residential units mulched with woodchips.</td>
</tr>
<tr>
<td> 
Condition of the first completed residential phase.</td>
<td> 
Condition of the first completed residential phase.</td>
</tr>
<tr>
<td> 
Cleared area for the next phase of development where services are being installed.</td>
<td> 
Cleared area for the next phase of development. Paving and curb installations in progress.</td>
</tr>
</table>

	
Cleared area for the next phase of development where services are being installed.	Cleared area for the next phase of development. Paving and curb installations in progress.
	
Condition of rehabilitated cleared sites where services were installed.	Location of the proposed swales adjacent to the internal road.
	
Central stormwater channel.	Existing residential house on-site.

 Natural area where the next phases of the development are to commence.	 Natural area where the next phases of the development are to commence.
 Small seasonal dam on site due to the recent rainfall. .	 Natural vegetation on site, along with the stockpiled subsoil and topsoil after site clearance.
 On-site dam to be reconstructed into a retention pond.	 On-site dam to be reconstructed into a retention pond.

 Cleared section of the site for road access.	 Successfully installed sewage pipeline towards the Modderrug River.
 Successfully installed sewage pipeline towards the Modderrug River.	 Modderrug River buffer zone.
 Successfully installed sewage pipeline towards the Modderrug River.	 Stockpiled subsoil and topsoil after site clearance.

Cleared section of the site for road access.

Cleared section of the site for road access.

Sewage systems being installed towards the entrance of the site.

Chemical toilet in place adjacent to the works area.

Lockable storage container in place near the next phase of the development, where services are being installed.

Existing residence on-site.