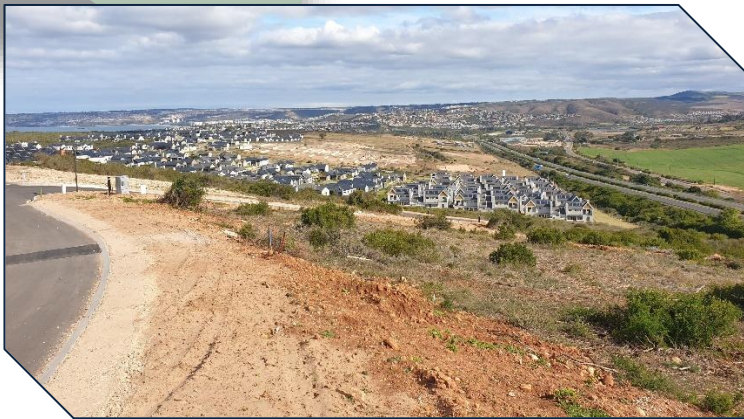


THE PROPOSED RESIDENTIAL DEVELOPMENT ON A PORTION OF THE FARM VAALE VALLEY 219, MOSSEL BAY, HARTLAND LIFESTYLE ESTATE.

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

DEA&DP EIA REF. NO. 16/3/3/5/D6/29/0001/25
NEAS REF. NO. WCP/EIA/AMEND/0000907/2025



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KAPPEC

5 September 2025

DETAILS OF THIS REPORT

Status of this Report	Final Regulation 34 External Compliance Audit Report
Date Submitted	September 5, 2025
Public Review Period	Not Applicable
Report Title	The Proposed Residential Development on a Portion of the Farm Vaale Valley 219, Mossel Bay, Hartland Lifestyle Estate.
Applicant	Managing Director Hartland Lifestyle Estate (Pty) Ltd. Unit 1, K109 Business Park 1 Tinus de Jongh St. Van Eck Park Brakpan 1541 Mr. Andre Le Roux E-mail: Andre@dalmar.co.za
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DISCLAIMER

This report has been prepared for Hartland Lifestyle Estate, represented by Mr. Andre Le Roux, and is subject to and issued in accordance with the agreement with Kapp Environmental Consultant (Pty) Ltd. (KAPPEC).

The opinions expressed in this report have been based on the information supplied to KAPPEC by the Client and the relevant Environmental 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, 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

5 September 2025

Date

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ABBREVIATIONS

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

APPENDICES

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INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd (KAPPEC), has been appointed by Hartland Lifestyle Estate, represented by Mr. Andre Le Roux (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 25 of the Original Environmental Authorization, as substituted in the 2023 Amended EA, and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

A Record of Decision (RoD) was issued to Hartenbos Landgoed on 18 August 2009 (Ref No: EG12/2/1-AM18-Farm Vaalevalley 219/B, Mossel Bay) in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) and the Environmental Impact Assessment Regulations.

On 18 December 2012, an amendment to the RoD (Ref. No. M3/6/5) was granted to update the applicant's details, extend the validity period of the Environmental Authorisation to five years from the date of issue, and revise the Environmental Management Programme for both the construction and operational phases.

A further amendment was granted on 12 February 2018 (Ref no: EIR/MSB/MS/36/SD/3/8) to amend the duration and expiry date of the appeal RoD to be valid until 18 August 2019.

In 2023, an amendment application was submitted in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) and Part 2 and 4 of Chapter 5 of the Environmental Impact Assessment Regulations, 2014, for the amendment of the Environmental Authorisation issued on 18 August 2009 (Ref 3/6/3) and the Environmental Management Programme (dated 8 March 2008). The competent authority:

- Granted in part, the amendment of the Environmental Authorisation issued on 18 August 2009.
- Refused the removal of the social housing node from the development proposal.
- Refused the amendment of Condition 8.3 of the Environmental Authorisation (18 August 2009) to allow kikuyu grass (*Pennisetum clandestinum*) in the OEMP.
- Granted the removal of the impact management action in the Construction Phase EMP (March 2008) and Operational Phase EMP (June 2008) regarding the establishment of an Environmental Liaison.
- Refused the amendment to the impact management action and outcome in the CEMPr and OEMPr relating to Condition 8.3 regarding the inclusion of kikuyu grass.

On 18 July 2025, an addendum to the Amended 2023 EA was issued, updating both the Construction and Operational EMPs. The addendum authorises the inclusion of a 15 m telecommunication mast with a footprint of 64 m² within Hartland Lifestyle Estate Phase II, while also revising the development description to include 2 288 residential units (with 150 social housing units), a 0.88 ha business zone, a 3.24 ha community zone, 235 ha of managed open space, and associated infrastructure. Annexed plans and designs of the mast are incorporated, while additional environmental safeguards are introduced, requiring the mast to be placed in degraded areas, implementation of alien plant control, search-and-rescue of certain plant species, protection of fauna, and visual impact mitigation through vegetation screening, colour selection, and non-reflective materials.

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 EMP. The body of this report will incorporate the auditable conditions and requirements contained in both the EA and the EMP. The conditions of the EA have been 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 EAP instruction.

PROJECT DESCRIPTION

The proposed development consists of 2,288 residential units, comprising both single residential erven and general residential uses, including 150 social housing units. The development will also include a 0.88 ha Business Zone, a 3.24 ha Community Zone (to accommodate a school and sports field), and an Open Space of approximately 235 ha, excluding internal open spaces, which will be managed as a nature reserve. A road network and associated infrastructure services will be developed throughout the footprint.

According to the 2025 Amendment EA, a telecommunications tower of no more than 15 m in height and with a footprint of approximately 64 m² will be constructed within Phase 2. The mast will be placed in the most degraded area to avoid disturbance to indigenous vegetation, with additional mitigation measures such as planting indigenous trees and shrubs around the base to provide visual screening. The structure will be designed with matte, neutral colours and non-reflective materials to minimise glare and visual intrusion, particularly from key viewpoints along the N2 highway and nearby residential areas such as Hartenbos and Riverside. Although the tower requires transformation of approximately 64 m² of open space earmarked for conservation, this is regarded as a minor loss in light of the 3 572 m² increase in internal open spaces approved in the previous EA amendment. The Visual Impact Assessment (VIA) further supports the inclusion of the mast, noting that the windmill-inspired design complements the peri-urban character of the area and assists the structure in blending into the surrounding landscape.

The main access to the site will be provided via the New Vintage Development to the southwest of Hartland, with secondary access from the MR344 through the existing culvert under the N2 National Road. Potable water supply will be secured from a new 15Ml reservoir, which will also serve the Hartland Lifestyle Estate and potential future developments in the area, supported by an additional 5Ml reservoir and booster pump station. Sewerage will be managed through a gravity sewer network and sewage pump stations, with effluent conveyed to the Hartenbos Regional Sewage Treatment Works.

The property is situated within a coastal fynbos/thicket environment on the Southern Cape coastal plain. Vegetation surveys (2008; 2022) identified the dominant vegetation as a mosaic of Hartenbos Dune Thicket, Canca Limestone Fynbos and Mossel Bay Shale Renosterveld, with large areas historically transformed by agricultural practices. Certain indigenous species such as *Sideroxylon inerme* (milkwood), a protected tree species, occur within the site, and permits will be required prior to any removal. While earlier surveys recorded species of conservation concern (e.g., *Diosma aristata* and *Haworthia parksiana*), more recent compliance studies (2022) did not record any species of conservation concern within the development footprint.

Faunal surveys indicated low species diversity on the site, with only common and generalist bird and mammal species recorded, alongside isolated observations of small mammals (e.g., *Rhabdomys pumilio*, *Gerbilliscus afra*) and spoor of *Genetta genetta*. No faunal species of

conservation concern were identified.

A freshwater compliance assessment confirmed that no freshwater features are present within the development footprint. The sensitivity of aquatic biodiversity for the site is considered low, and no specialist freshwater studies are required.

LISTED ACTIVITIES

The activities were authorized in terms of Schedule 1 of Government Notice No. R1182 of 5 September 1997, as amended.

The authorised activities are:

- 1(c): The construction, erection or upgrading of – with regard to any substance which is dangerous or hazardous and is controlled by national legislation – (i) infrastructure, excluding road or rail, for the transportation of any such substance; and (ii) manufacturing, storage, handling, treatment or processing facilities for any such substance.
- 1(d): The construction, erection or upgrading of roads, railways, airfields and associated structures.
- 1(k): The construction, erection or upgrading of reservoirs for public water supply.
- 1(m): The construction, erection or upgrading of public and private resorts and associated infrastructure
- 1(n): The construction or upgrading of sewage treatment plants and associated infrastructure.
- 2(c): The change of land use from agricultural or zoned undetermined use or an equivalent zoning to any other land use.
- 10: The cultivation or any use of virgin land.

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

Activity Number: 9

Activity Description:

The development of infrastructure exceeding 1 000 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.

This activity relates to the bulk services which will be installed. Their internal diameters will vary between 600mm and 300mm. The lengths will exceed the 1km threshold.

Activity Number: 10

Activity Description:

The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, wastewater, return water, industrial discharge or slimes –

(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 the bulk transportation of sewage, effluent, process water, waste water, return water, industrial discharge or slimes inside a road reserve or railway line reserve; or

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

The internal sewage system will be within the thresholds, and it is understood that the bulk removal will be through 2 existing 450mm siphons.

Activity Number: 24

Activity Description:

The development of a road—

(i) for which an environmental authorisation was obtained for the route determination in terms of activity 5 in Government Notice 387 of 2006 or activity 18 in Government Notice 545 of 2010; or

(ii) with a reserve wider than 13,5 meters, or where no reserve exists where the road is wider than 8 metres;

but excluding a road—

(a) which is identified and included in activity 27 in Listing Notice 2 of 2014;

(b) where the entire road falls within an urban area; or

(c) which is 1 kilometre or shorter.

The proposed project includes the development of various roads with widths which range from 8m to 20m.

Activity Number: 25

Activity Description:

The development and related operation of facilities or infrastructure for the treatment of effluent, wastewater or sewage with a daily throughput capacity of more than 2 000 cubic metres but less than 15 000 cubic metres.

The hydraulic loading of the sewage system is estimated at 1566,9 kℓ/day. This is fairly close to the

threshold, and as such, this activity should be included.

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 site was and still is zoned for agriculture except where houses have already been constructed.

Environmental Impact Assessment Regulations Listing Notice 2 of 2014, as amended.

Activity Number: 15

Activity Description:

The clearance of an area of 20 hectares or more of indigenous vegetation, excluding 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.

The development site exceeds 20ha, and as such, this activity should be included in the amended EA.

Environmental Impact Assessment Regulations Listing Notice 3 of 2014, as amended.

Activity Number: 2

Activity Description:

The development of reservoirs, excluding dams, with a capacity of more than 250 cubic metres.

i. Western Cape

- i. A protected area identified in terms of NEMPAA, excluding conservancies;
- ii. In areas containing indigenous vegetation; or
- iii. Inside urban areas:
 - (aa) Areas zoned for use as public open space; or
 - (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority, or zoned for a conservation purpose.

The combined capacity of the two reservoirs will be 2000 cubic meters (20MI).

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 includes the development of various roads with widths which range from 8m to 20m.

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 associated with the development footprint; the site is zoned agriculture which is considered equivalent to conservation.

Activity Number: 15**Activity Description:**

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

f. Western Cape

i. Outside urban areas, or

ii. Inside urban areas:

(aa) Areas zoned for conservation use or equivalent zoning, on or after 02 August 2010;

(bb) A protected area identified in terms of NEMPAA, excluding conservancies; or

(cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act as adopted by the competent authority.

The development will exceed the threshold, and the site was zoned Agriculture.

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

25. The Holder must, for the period during which the environmental authorisation and EMPr (comprising of the CEMP and OEMP) remain valid, ensure the compliance with the conditions of the environmental authorisation and the EMPr, is audited.

25.1. 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:

25.1.1. During the period which the activities have been commenced with on site until the construction of the bulk internal service infrastructure (i.e., internal roads; water-, sewer-, electricity reticulation and bulk storm water) has been completed on site, the Holder must undertake annual environmental audit(s) and submit the Environmental Audit Report(s) to the Competent Authority.

A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of completion of the construction of bulk internal services and the post-construction rehabilitation and monitoring requirements thereof.

25.1.2. During the period the development of the residential phases (i.e., construction of top structures) is undertaken, the Holder must ensure that environmental audit(s) are performed regularly and submit these Environmental Audit Report(s) to the Competent Authority.

During this phase of the development, the frequency of the auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr may not exceed intervals of three (3) years.

A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of completion of the final phase of the residential development and the post-construction rehabilitation and monitoring requirements thereof.

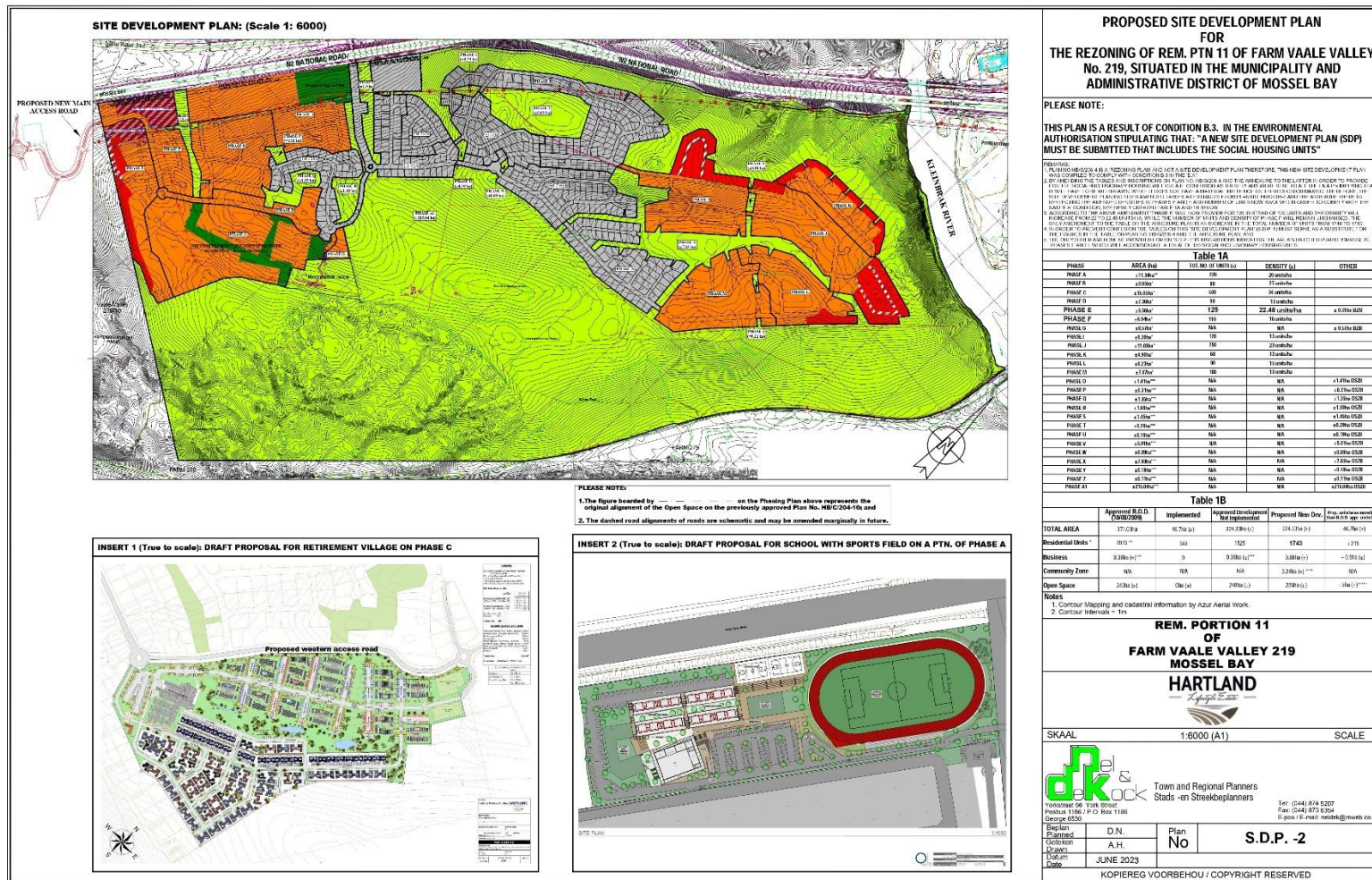


FIGURE 1: SITE DEVELOPMENT PLAN (NEL & DE KOCK, JUNE 2023)

CONDITIONS OF AUTHORISATION

TABLE 2: ENVIRONMENTAL AUTHORISATION GENERAL CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
1.	One week's notice, in writing, must be given to the Department, before commencement of construction activities. 1.1 Such notice shall make clear reference to the site location details and reference number given above. 1.2 The said notice must also include proof of compliance with the following conditions described herein: Condition 7, 8, 23, 25 & 27.	Non-compliant. No such notice could be obtained by the ECO, during the first external audit or DEA&DP due to lost archives. According to the ECO reports and the information obtained during the first external audit conducted by HilLand Environmental, construction of Phase 1 and the installation of services commenced in early 2019. SES did not submit a commencement notification as they were not informed of the start of construction activities, which only proceeded to ensure that Town Planning approvals did not lapse. This information is recorded in the "Hartland Landgoed EMR for July 2019," as referenced in the first external audit and ECO reports. Formal notification was only submitted to DEA&DP on 26 July 2019.
2.	An integrated waste management approach must be used that is based on waste minimisation and must incorporate reduction, recycling, re-use and disposal where appropriate. Any solid waste shall be disposed of at a landfill licensed in terms of section 20 of the Environment Conservation Act, 1989 (Act No. 73 of 1989). A system of waste separation at source must be implemented, and the separated waste must be regularly transported to the various recycling companies.	During the second external audit as conducted by Kapp Environmental Consultants, appropriate skips and bins were in place near all the construction sites, site camps, and construction camps. According to Dalmar and the ECO building waste and rubble are disposed of at the Grootbrak dump site, where no delivery slips are issued; instead, all loads are recorded in the security logbook at the entrance gate and is herewith attached as Appendix M.
3.	The mitigation/rehabilitation measures and recommendations as	HilLand Environmental applied through PAIA for access to the

	detailed in the Environmental Impact Report dated 5 September 2006 compiled by Sharples Environmental Services, must be adopted and implemented.	Environmental Impact Report dated 5 September 2006 compiled by Sharples Environmental Services, but unfortunately, no such report was received in the data pack. Mitigation measures as per the Amended Construction Phase EMP are being implemented, and the biophysical implications as set forth in the original EA.
4.	The recommendations made in the Vegetation and Vertebrate Fauna Sensitivity Analysis dated June 2005 by Conservation Management Services must be implemented.	Mitigation measures as set forth in the Vegetation and Vertebrate Fauna Sensitivity Analysis dated June 2005 by Conservation Management Services is being implemented and has been included into the Amended EMP, Construction EMP and Operational EMP.
5.	The recommendations included in the report by MAPCARM cc dated 28 September 2005 must be implemented. Permits, as stipulated in the aforementioned report, must be obtained from Heritage Western Cape (HWC) before commencement of each development phase.	During the first external audit, the auditor confirmed with HWC that the committee is satisfied that the requirements of the Environmental Authorisation (EA) regarding archaeological monitoring are being met. Currently, Dr. Nilssen continues to carry out archaeological monitoring during bulk earthworks and excavations to ensure ongoing compliance with the EA. Monitoring reports are submitted monthly in conjunction with the ECO reports. The burial sites at the entrance of Hartland Lifestyle Estate have been retained within the designated open space area, securely fenced off, and the surrounding vegetation has been landscaped to be visually appealing while remaining discreet to the general public.
6.	No new roads may be made within the nature area. No parking for visitors to the beach may be made in the nature area. Parking can be provided on the transformed areas as indicated on the vegetation sensitivity map (Figure 3 of the Vegetation and Vertebrate Fauna Sensitivity Analysis dated June 2005) or within the disturbed area on Hartenbos Landgoed Phase I. Existing roads or tracks that are	To our knowledge, no new roads have been created within the natural area, except for the necessary firebreaks and perimeter monitoring access routes. The Invasive Alien Clearing team has established temporary access paths through alien vegetation to effectively reach and remove invasive plant species. During the second external audit, the ECO provided details regarding the

	required for the management of the nature area may be retained. All other roads that are not required for management must be rehabilitated. A system of hiking trails through the nature area may be established in accordance with the Operational phase environmental management plan.	guardhouse and ablution facilities used by residents accessing the footpath to the Kleinbrak Estuary. A wooden, gated ablution facility, constructed on stilts and equipped with a conservancy tank and a Jojo tank for water, has been installed to allow residents to safely use the facilities and return without impacting the surrounding environment. No parking areas have been constructed, and access remains via the natural footpaths, in accordance with the OEMPr.
7.	A Fire Management Programme must be developed before any construction commences, except for the construction of the proposed Social Housing development. The Fire Management Programme must be approved by CapeNature as well as the Mossel Bay Fire Chief and the Eden Fire Chief.	A Fire Management Plan has been developed for Phase 2 of the development in 2019, as it is deemed sufficient for the current construction activities. No record of approval by CapeNature, the Mossel Bay Fire Chief and the Eden Fire Chief is available. PAIA request during the first external audit could also not provide the approval letters.
8.	Chapter 12 of the Operational Management Plan must be expanded to include, amongst others, the following: 8.1 No cats may be allowed on the estate. 8.2 The list of plant species which may not be planted must also include Pine trees, Monkey puzzle trees, palm trees or any other exotic tree species with a growth form which is unlike the growth form of the locally indigenous vegetation, and which may dominate the landscape. 8.3 The list of plant species that should be encouraged must include all the locally occurring indigenous plant species, as well as kweek grass and buffalo grass for lawns.	Please refer to pg. 25-28 of the OEMP as updated in February 2025. All the requirements below have been included in the EMP under Chapter 12.
9.	A Property Owners Association must be established to which all property owners on Hartenbos Landgoed must belong. Each member of the POA must sign acceptance of the POA management plan/rules	A POA has been established, and all rules and regulations are provided to the property owner along with the OEMP.

	and regulations and operational phase Environmental Management Plan, which they will abide to.	
10.	The applicant must approach CapeNature with a request to enter into some form of agreement or contract in terms of CapeNature's Stewardship Programme.	During the second external audit, the ECO mentioned that agreements and contracts in terms of CapeNature's Stewardship Programme is being discussed with the developer.
11.	All invasive alien vegetation must be cleared from the site. The initial clearing of all alien invasive vegetation must take place within 24 months after commencement of construction work. Follow-up clearing of invasive alien plants must be done annually.	According to the ECO alien clearing is continuously conducted for the eradication of <i>Acacia cyclops</i> within the surrounding natural area. During the site audit such evidence were observed, however it is recommended that cleared Rooikrans should be removed from site and rehabilitation of dunes prioritised where necessary.
12.	The area with natural vegetation must be managed as a nature reserve according to a management plan approved by CapeNature.	Unfortunately, no conservation management plan has been received, although a notification board along the trails informs the public of the permitted and prohibited activities within the conservation area.
13.	With reference to layout plan no. HS/C/204/9 dated February 2009, the following erven must be removed from the proposed development: 1019 to 1053 and the two parking areas for 50 and 70 cars. These areas are to be included in the open space network. 13.1 An amended layout plan depicting these changes must be submitted to the Department for approval prior to commencement of construction activities.	DEA&DP issued an approval of the August 2009 layout plan no. HB/C/204/10 on 4 September 2009 and confirms the compliance of required layout changes. Please refer to the information received in the first external audit.
14.	Only single storey dwellings (6m height restriction from natural ground level) must be constructed on the following erven indicated on layout plan NB/C/204/9 dated February 2009: 1 & 2; 84 to 88; 89 to 107; 523 to 540; 528 to 544; 880 to 887; 1054 to 1087; 1287 to 1290; 1009 to 1018; 1253 to 1269; 1245 to 1247; 1284 to 1300; 1226 to 1228; 545 to 611; 656 to 681; 643 to 655 and 548 to 567.	Noted. Only single story dwellings are being constructed within the designated erven as per the 2023 Amended SDP.

15.	A fire break or buffer of at least 10m must be maintained between erf boundaries and the existing edge of the natural vegetation. All buildings must be set back at least 10m from the edge of the natural vegetation. This 10m buffer must not be bulldozed, but the grass in this area must be regularly cut. A 20m buffer must be provided for all erven located closest to the N2 highway. This buffer may also serve as an access for firefighting vehicles.	All required buffers have been maintained, with a 10 m setback from natural vegetation for buildings and regular grass cutting, and a 20 m buffer provided for erven adjacent to the N2, which also allows access for firefighting vehicles.
16.	The following Resource Conservation Measures must be implemented: 16.1 Rainwater from roofs must be collected and stored in rainwater tanks. No taps linked to piped, potable water may be installed outside buildings. Any water used in gardens or outside buildings must only be collected rainwater. 16.2 All buildings must be fitted with water-saving devices such as low-flow showerheads and double-flush toilets. 16.3 All residential dwellings must be fitted with and use solar hot water systems.	Noted, during the site audit solar geysers, and JoJo tanks were observed at the majority of the residences within the development. Contractor to please keep record of this.
17.	A stormwater management plan must be prepared and approved by the Mossel Bay Municipality. Hard surfaces must be limited or reduced where possible. Measures must be implemented to slow down the flow of storm water, such as artificial wetlands and swales, which will also assist in filtering storm water, dissipating energy and increasing infiltration of storm water, thereby reducing storm water and replenishing groundwater. Storm water may not be allowed to run down the steep slopes on the north-eastern boundary towards the Kleinbrak River.	On 4 November 2024, Mossel Bay Municipality approved the updated Stormwater Management Plans (dated 30 July 2024, documents 13061-C-BULK-SW1-B and 13061-C-BULK-SW1-C). As part of Phase A, stormwater roadside channels and swales were constructed adjacent to the showhouse to manage surface water runoff effectively. In addition, a temporary stormwater swale and berm have been installed to redirect stormwater from the showhouse towards the newly created channels, ensuring controlled flow and minimising potential erosion or localised

		flooding.
18.	No buildings are allowed on slopes of 1:4 and steeper.	Noted, contractor to comply.
19.	Permits must be obtained from the Department of Water Affairs and Forestry before any protected tree species (including Milkwood trees, <i>Sideroxylon inerme</i>) or forest may be disturbed, pruned or damaged in any way.	The following permits have been secured for the development: • CapeNature Certificate of Adequate Enclosure Permit / License No: CN4-102-28892 • Link Road Permit (DFFE) Licence No: WC-GR-00250-2022-23 <i>Authorising actions and activities affecting indigenous trees in natural forests and/or protected trees, or the acquisition or disposal of such trees or their products.</i> • Ring Road Permit (DFFE) Licence No: WC-GR-00185-2024-25 <i>Authorising actions and activities affecting indigenous trees in natural forests and/or protected trees, or the acquisition or disposal of such trees or their products in terms of Section 7(1) of the National Forests Act, 1998, as amended.</i> In addition, an application is currently underway for a further NFA permit to allow for the removal of existing hedgerows located within the development footprint of the proposed school.
20.	The existing indigenous hedgerows on the property must be retained.	Noted. Multiple hedgerows have been retained between residences outside the approved development footprints. For those located within the development footprint, a permit for their

		removal will be obtained.
21.	The Guidelines contained in the Economic Impact Assessment Report by Urban-Econ must be implemented. Preference must be given to local labour. The applicant must provide ample opportunity for training and skills transfer.	Noted, skills transfer, and training is being implemented ongoing.
22.	Bulk earthworks and excavations must be monitored by a professional archaeologist. Should any heritage remains be exposed during excavations, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape (in terms of the National Heritage Resources Act, 1999 (Act No. 25 of 1999)). Heritage remains uncovered or disturbed during earthworks must not be disturbed further until the necessary approval has been obtained from Heritage Western Cape. 22.1 If any archaeological remains (including but not limited to fossil bones and fossil shells, 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, rock art and rock engravings) are discovered during construction they must immediately be reported to Heritage Western Cape and must not be disturbed further until the necessary approval has been obtained from Heritage Western Cape, 22.3 If any graves or unmarked human burials are discovered, or any human remains be disturbed, exposed or uncovered during excavations and earthworks, they must be treated with respect, and SAHRA must be notified immediately and must not be disturbed further until the necessary approval has been obtained from SAHRA. An archaeologist must be contracted to remove the remains at the	HWC confirmed during the first external audit that the requirements of the Environmental Authorisation (EA) for archaeological monitoring are being met. Archaeological monitoring continues to be undertaken by Dr. Nilssen during bulk earthworks and excavations, with monthly monitoring reports submitted alongside the ECO reports. The burial sites at the entrance of Hartland Lifestyle Estate have been preserved within the open space area, fenced off for protection, and landscaped in a way that is visually unobtrusive to the general public. For individual residential erven, notifications of works were submitted in good time prior to commencement. No significant heritage resources or sites were exposed during these activities; however, the discovery of Stone Age implements has contributed to a broader understanding of the pre-colonial archaeological record and depositional environments of this coastal area. The developer is compliant with the heritage requirements of the EA, and there are currently no heritage-related issues or concerns requiring further investigation, management, or mitigation in terms of the NHRA (Act 25 of 1999).

	expense of the developer.	
23.	The applicant must appoint a suitably experienced Environment Control Officer before commencement of any land clearing or construction activities to ensure that the mitigation/rehabilitation measures and recommendations referred to in this Record of Decision are implemented and to ensure compliance with the provisions of the construction phase EMR.	HilLand Environmental has taken over the ECO role, with Stefan Delport and Annelize Olivier conducting weekly ECO inspections since January 2021. ECO monitoring reports have been submitted by HilLand Environmental to DEA&DP in accordance with requirements.
24.	The Construction Phase Environmental Management Plan for the proposed development, dated March 2008, and the Operational Phase Environmental Management Plan for the proposed development, dated June 2008, by Sharples Environmental Services must be implemented. Any amendments to the environmental management plans must be submitted to the Department for approval.	Noted. Changes to the CEMP and OEMP have been approved together with the amended 2025 EA DEA&DP Ref No: 16/3/3/5/D6/29/0001/25
25.	25. The Holder must, for the period during which the environmental authorisation and EMPr (comprising of the CEMP and OEMP) remain valid, ensure the compliance with the conditions of the environmental authorisation and the EMPr, is audited. 25.1 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: 25.1.1 During the period which the activities have been commenced with on site until the construction of the bulk internal service infrastructure (i.e., internal roads; water-, sewer-, electricity reticulation and bulk storm water) has been completed on site, the	Noted. HilLand Environmental undertook the first environmental audit in December 2020. A PAIA application was subsequently submitted in May 2021 to retrieve missing information, part of which has since been received. Following this, HilLand

	Holder must undertake annual environmental audit(s) and submit the Environmental Audit Report(s) to the Competent Authority. A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of completion of the construction of bulk internal services and the post-construction rehabilitation and monitoring requirements thereof. 25.1.2 During the period the development of the residential phases (i.e., construction of top structures) is undertaken, the Holder must ensure that environmental audit(s) are performed regularly and submit these Environmental Audit Report(s) to the Competent Authority. During this phase of the development, the frequency of the auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr may not exceed intervals of three (3) years. A final Environmental Audit Report must be submitted to the Competent Authority within three (3) months of completion of the final phase of the residential development and the post-construction rehabilitation and monitoring requirements thereof.	Environmental conducted an updated audit in September 2021 once some of the outstanding information had been made available. Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated July 2025, by Hartland Lifestyle Estate, represented by Mr. Andre Le Roux (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 25 of the Original Environmental Authorization, as substituted in the 2023 Amended EA, and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).
26.	26. The Environmental Audit Report(s), must 26.1 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 the EAP who	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated July 2025, by Hartland Lifestyle Estate, represented by Mr. Andre Le Roux (the Applicant) as the independent environmental practitioners to undertake an

managed the application or the EIA process. 26.2 provide verifiable findings, in a structured and systematic manner, on 26.2.1 the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and 26.2.2 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. 26.3 identify and assess any new impacts and risks as a result of undertaking the activity; 26.4 evaluate the effectiveness of the EMPr; 26.5 identify shortcomings in the EMPr; 26.6 identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 26.7 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; 26.8 indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation; 26.9 include a photographic record of the site(s) applicable to the audit; and 26.10 be informed by the ECO reports.	external compliance audit in fulfilment of Condition 25 of the Original Environmental Authorization, as substituted in the 2023 Amended EA, and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended). Please refer to this report for verifiable findings presented in a structured and systematic manner. The report outlines the level of compliance with the conditions of the Environmental Authorisation (EA) and the EMPr, and assesses whether these measures are sufficient. It further evaluates the ability of the EMPr to adequately avoid, manage, and mitigate environmental impacts associated with the activity. The report also identifies and assesses any new risks or impacts, evaluates the effectiveness of the EMPr, highlights shortcomings, and indicates where changes may be required to strengthen the avoidance, management, and mitigation measures. Construction of Phase 1 and the installation of services commenced early 2019. Current development is taking place in Phase A, C, and D, as well as the main access road. Rehabilitation throughout the development occurs continuously as construction continues. Alien vegetation is continuously cleared.
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27.	All outdoor advertising associated with this activity, whether on or off the property concerned, must comply with the applicable Local Authority By-Law for the control of Outdoor Advertising or in the absence of local legislative controls, must comply with the South African Manual for Outdoor Advertising Control (SAMOAC) available from: The Director: Environmental Impact Management Department of Environmental Affairs and Tourism Private Bag X447 Pretoria 0001	No outdoor advertising was observed outside the development, other than the approved entrance boards and road signage.
28	The applicant shall be responsible for ensuring compliance with the conditions contained in the Record of Decision by any person acting on his behalf, including but not limited to, an agent, servant, employee or any person rendering a service to the applicant in respect of the activity, including but not limited to contractors and consultants.	Noted, the Holder of the EA remains responsible for all activities and personnel acting on site.
29.	The owner and/or developer must notify this Department and any other relevant authority, in writing, within 24 hours thereof if any condition of this authorisation is not adhered to.	No non-compliances with the conditions of the authorisation and its amendments were observed/provided, other than the missing and incomplete information relating to the notification of commencement and I&APs.
30.	Departmental officials shall be given access to the property referred to in B above for the purpose of assessing and/or monitoring compliance with the conditions contained in this Record of Decision, at all reasonable times.	Access to the site was permitted via the secondary access from the MR344 through the existing culvert under the N2 National Road.
Addendum to Environmental Authorisation Issues on 18 July 2025 DEA&DP Ref. 16/3/3/5/D6/29/0001/25		
1.	The applicant must, in writing, within 14 (fourteen) calendar days	The ECO did not receive any notification of the 2025

	from the date of the Department's decision – 1.1 notify all registered interested and affected parties registered in the previous EIA process of – 1.1.1 the outcome of the application; 1.1.2 the reasons for the decision; 1.1.3 the date of the decision; and 1.1.4 the date of issue of the decision; 1.2 draw the attention of all registered interested and affected parties registered in the previous EIA process to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations, 2025 (as amended) in section G below; 1.3 draw the attention of all registered interested and affected parties registered in the previous EIA process to the manner in which they may access the decision.	Amendment to the I&APs from the designated EAP and is still awaiting that information. As a result, the condition cannot be adequately reviewed or evaluated at this stage, as the necessary documentation and details have not been made available for consideration.
2.	The holder of the environmental authorisation must within thirty (30) calendar days of the issue of this amendment decision, provide the competent authority with written proof of compliance with Condition 1 above.	The ECO did not receive any notification of the 2025 Amendment to the I&APs from the designated EAP and is still awaiting that information.
3.	The thicket 'hedge' and some fallow land with new regrowth in the vicinity of the telecom mast site (as indicated by the specialist findings) must be avoided and taken into account when determining the positioning the mast.	The thicket hedge and fallow land with regrowth in the vicinity of the telecom mast site will be monitored and taken into account during the construction of the mast. It is required that the mast will be constructed in a degraded area.

EA Compliance Rating	91.96%
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SITE AUDIT FINDINGS

A second external environmental audit was conducted on 7 August 2025 in accordance with the conditions of the original and amended Environmental Authorisations and the EMPr.

Access and Site Establishment

Access to the site was obtained via the secondary entrance from the MR344 through the existing culvert under the N2 National Road. The main contractors' camp is located within Phase E, comprising storage containers and site offices for the various contractors. The camp was observed to be in a neat and well-maintained condition, with the yard fully screened and secured after hours. Facilities at the camp include a water truck for dust suppression, a fuel bowser, a chipper, and screened storage. Nursery trees intended for rehabilitation and landscaping have also been placed adjacent to the camp.

Stormwater and Landscaping

The developer has integrated natural stormwater channels along the roadside, rehabilitated and revegetated with vygies. As part of Phase A, roadside stormwater swales and channels were constructed adjacent to the showhouse, with a temporary berm and swale created to redirect stormwater flows and reduce erosion risk. The existing hydrological area within the retirement village has been incorporated into the broader stormwater system through the construction of a retention pond. Along the main access road, the final stormwater pipeline is being installed, with topsoil and subsoil stockpiles separated for later reuse in backfilling.

Throughout the site, aloes cleared from construction areas have been replanted into open spaces, and indigenous trees have been incorporated into landscaped community areas, including Phase S. Kukuyu grass is being systematically removed and replaced with kweek grass as requested. The eucalyptus trees hosting a resident jackal buzzard have been retained.

Vegetation, Buffers and Conservation Areas

A compliant firebreak buffer has been established along the game fence and the N2. A 10 m buffer between erf boundaries and the edge of natural vegetation has been maintained, with buildings set back accordingly. For erven closest to the N2, the required 20 m buffer has also been provided, which may serve as access for firefighting vehicles.

Towards the southeastern section of the site, along the conservation area, the firebreak along the game fence has been maintained. Further along the fence towards the railroad, the soil becomes increasingly sandy. Permeable paving grids have been installed along the access track to stabilise the sandy soils and prevent erosion, supported by geogrid netting. Where slopes of sandy soil were unstable and prone to erosion, sandbags were placed to stabilise the area. Together with the ECO, the auditor recommends that once sandbags have been installed, cleared vegetation must be chipped and used as mulch and spread across this section to ensure proper rehabilitation.

Further along the property boundary, vegetation is being cleared to maintain the management track established after the fence was installed. A no-go fence has also been erected to protect the sensitive vegetation area above Phase C. During the audit, the ring road surrounding the

development boundary was inspected; it currently exists as a single-track road. Development has progressed along Phase H, while the northeastern section of the site is still to be developed. Within the conservation section of the estate, owl boxes have also been installed.

To our knowledge, no new roads have been created within the natural area, except for the necessary firebreaks and perimeter monitoring access routes. Authorised footpaths and bike paths were observed across the site. The Invasive Alien Clearing team has also created temporary access paths through dense stands of alien vegetation to effectively reach and eradicate invasive species.

During the audit, the ECO provided details regarding the guardhouse and ablution facilities accessible to residents using the footpath to the Kleinbrak Estuary. A wooden, gated ablution facility, constructed on stilts and equipped with a conservancy tank and Jojo tank, has been installed to allow residents to safely use ablution facilities and avoid impacting the surrounding environment. No parking areas have been constructed, and access is maintained via the natural footpaths, in accordance with the OEMPr.

Construction Activities

Current construction is active within Phase A, where services are being installed and retaining walls established. The foundations for the Hartland school have been cut, and clearance of the sports field is in progress. Several vegetation debris stockpiles and topsoil stockpiles were observed within this area, many of which have naturally revegetated. These are earmarked for reuse during backfilling and levelling of the school buildings and sports field.

Phase C is under construction, and Phase B is undergoing site establishment. Along Phase B, construction areas are screened with green netting to reduce visual impacts on the adjacent retirement village. Multiple units are under construction across phases, with landscaping works underway.

Facilities and Management

Cement batching was active on site at the time of the audit, with mortar boards in place and no cement waste or spills observed. A sufficient number of chemical toilets were located across the construction areas, all in good working order and hygienic. Soil stockpiles were well managed, with evidence of planned reuse. A water truck was available for dust suppression, and no significant dust fallout was observed.

Permits

The following permits have been obtained for the development:

- CapeNature Certificate of Adequate Enclosure (Permit/License No: CN4-102-28892)
- Link Road Permit (DFFE) – Licence No: WC-GR-00250-2022-23, authorising actions affecting indigenous and/or protected trees, and their acquisition or disposal.
- Ring Road Permit (DFFE) – Licence No: WC-GR-00185-2024-25, authorising actions

affecting indigenous and/or protected trees, and their acquisition or disposal, in terms of Section 7(1) of the National Forests Act, 1998, as amended.

In addition, an application is underway for a further NFA permit for the removal of existing hedgerows located within the development footprint of the proposed school.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 3: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Demarcate No-Go and Working Areas	
1.1	Identify and designate environmentally sensitive areas as No-Go areas in consultation with the ECO.	A no-go fence has been installed around the sensitive vegetation area above Phase C to ensure protection and prevent disturbance during construction activities. The conservation area shows no evidence of disturbance.
1.2	Demarcate all No-Go areas with a 1.2 m high shade cloth (or similar) fence, supported by stakes every 2–3 m, with top and bottom wire strands to ensure rigidity.	The construction area along Phase B has been fully screened with green shade netting to limit visual intrusion for nearby residents, and the contractors' yard within Phase E has also been securely screened and enclosed with fencing to ensure neatness, safety, and restricted access.
1.3	Erect "No-Go Area" signs (minimum 200 mm x 150 mm, red letters on white background) at prominent locations along the fence; where fencing is impractical, install signs at regular intervals.	DO NOT ENTER signage in capital letters with red lettering on a white background has been erected along the fenced sections.
1.4	Maintain demarcation until construction is completed to prevent disturbance of sensitive areas.	All demarcations and fencing have remained in place as construction proceeds.
1.5	Apply No-Go status to all areas of high or very high sensitivity (steep slopes, unstable soils, intact vegetation, etc.) as identified in specialist reports (Conservation Management Services, 2005; Synecology, 2008).	A no-go fence has been installed around the sensitive vegetation area above Phase C to ensure protection and prevent disturbance during construction activities. The conservation area shows no evidence of disturbance. Footpaths and bike paths have been established for use within the conservation area. Towards the southeastern section of the site, along the conservation area, the firebreak along the game fence has been maintained. Further along the fence towards the railroad, the soil becomes

		increasingly sandy. Permeable paving grids have been installed along the access track to stabilise the sandy soils and prevent erosion, supported by geogrid netting. Where slopes of sandy soil were unstable and prone to erosion, sandbags were placed to stabilise the area. Together with the ECO, the auditor recommends that once sandbags have been installed, cleared vegetation must be chipped and used as mulch and spread across this section to ensure proper rehabilitation.
1.6	Establish a minimum 3 m buffer around sensitive areas to prevent encroachment of construction materials or activities.	Surrounding the conservation area, a 3m buffer area has been established, as well as a fenced-off sensitive area above Phase C.
1.7	Identify and mark any additional sensitive areas (e.g., stripped or disturbed vegetation) as directed by the ECO.	No additional sensitive areas have been identified.
1.8	Ensure contractors and workers do not enter demarcated No-Go areas; trampling and disturbance must be strictly avoided.	The conservation area and sensitive vegetated area, which have been fenced off, do not show any signs of disturbance. Towards the southeastern section of the site, along the conservation area, the firebreak along the game fence has been maintained. Further along the fence towards the railroad, the soil becomes increasingly sandy. Permeable paving grids have been installed along the access track to stabilise the sandy soils and prevent erosion, supported by geogrid netting. Where slopes of sandy soil were unstable and prone to erosion, sandbags were placed to stabilise the area. Together with the ECO, the auditor recommends that once sandbags have been installed, cleared vegetation must be chipped and used as mulch and spread across this section to ensure proper rehabilitation.
1.9	Allow sufficient construction space for stockpiling and other approved activities without encroaching into No-Go areas.	No encroachment was observed during the site audit. All stockpiled material is placed within the development footprint.

1.10	Demarcate and protect all protected trees on site.	The existing protected trees have remained on site, and the road and house designs have incorporated them into the landscaping gardens.
2.	Site Camp & Site Facilities	
2.1	Set up the site camp strategically to support good environmental management and enable rapid response to emergencies (fires, hazardous substance spills, etc.).	The contractors' yard has been established and screened within Phase E, and is positioned to allow for controlled operations and oversight by the ECO.
2.2	Demarcate the No-Go boundary clearly; no disturbance may occur beyond this line at any stage.	Sensitive areas have been fenced off with a no-go fence (e.g. above Phase C), with clear red "NO-GO AREA" signage in place, ensuring that construction activities remain within approved footprints.
2.3	Position the site camp, storage facilities, stockpiles, waste bins, and temporary structures to minimise visual impact on surrounding residents and road users.	the contractors' yard has been screened, and Phase B was also screened off, thereby minimising visual intrusion for surrounding residents and road users.
2.4	Install stormwater outlets at frequent intervals and design them to prevent erosion at discharge points.	Stormwater outlets and naturally vegetated channels have been installed along the road sections, with permeable paving grids, geogrid netting, and sandbags placed to manage sandy soils and prevent erosion along the southeastern boundary of the site.
2.5	Develop and implement a stormwater management plan with ecological input, based on Sustainable Drainage Systems (SuDS).	A stormwater management plan has been developed and is actively being implemented across the site.
3.	Prevent Pollution and Soil Contamination	
3.1	<u>Pollution Management – Bitumen</u> - Excavate and dispose of any bitumen spills as hazardous waste. - Install erosion control measures (silt fences, berms, shutter boards) around stockpiles to prevent sediment runoff.	No bitumen spills were observed on site. Erosion and sediment control measures, including permeable paving grids, geogrid netting, and sandbags, have been installed to stabilise sandy soils. Stockpiles are being continuously used and monitored for erosion and dust fallout.
3.2	<u>General Pollution Management</u>	

	• Prevent any pollution of groundwater from site activities. • Contain polluted stormwater on site; no runoff or wastewater from construction may enter the environment. • Discharge stormwater into porous channels/swales (SUDS) aligned with contours. • Design frequent stormwater outlets to prevent erosion at discharge points.	No evidence of groundwater pollution or uncontrolled stormwater discharge was observed during the site visit. Stormwater is being contained on-site and managed through infiltration measures such as paving grids and swales aligned to the contours. Stormwater outlets have been installed at frequent intervals with erosion control measures in place to prevent scouring at discharge points.
3.3	<u>General Waste Management</u> • Provide dedicated waste bins/skips in a demarcated area on an impermeable surface. • Provide separate bins/skips for recyclable, general, and hazardous waste. • Stockpile builders' rubble and green waste only within the site camp or in designated skips. • Place all waste in the correct bin/skip/stockpile. • Keep hazardous waste bins on impermeable bunded surfaces with 110% containment capacity. • Ensure bins/skips have secure lids or coverings to prevent windblown waste or scavenging. • Empty waste bins/skips regularly; no overflow permitted. • Instruct all workers not to litter and to use the designated bins. • Ensure workers are trained in correct waste disposal procedures. • Classify and manage all waste in accordance with the Waste Classification and Management Regulations (GN R.634 of 2013).	Waste bins and skips are available on site, with separation between general, recyclable, and hazardous waste streams. Screening around the contractors' yard ensures controlled stockpiling of materials and rubble. The Groot Brak licensed waste facility is used for disposal, with deliveries logged in the security gate record book. At the location of the sports field, windblown litter was observed and should please be removed daily.

	• Dispose of waste to landfill in accordance with GN R.635 of 2013. • Dispose of all waste (hazardous and general) at licensed Waste Disposal Facilities (WDFs).	
3.4	<u>Pollution Management – Hydrocarbons (Oil, Fuel, etc.)</u> • Keep all vehicles and machinery in good condition and regularly inspect for leaks. • Remove or repair leaking vehicles/machinery immediately; ECO may instruct removal until fixed. • Conduct repairs only within the designated site camp maintenance area, using drip trays/tarpaulin. • Refuel only in the site camp/maintenance yard; use drip trays during refuelling. • Use drip trays when decanting hazardous substances or refilling tanks. • Place drip trays under generators, pumps, and other fuel-using equipment. • Elevate fuel tanks where feasible to improve leak detection. • Provide a spill kit on site; train workers in correct spill kit use. • Excavate and dispose of soil contaminated by hazardous substances as hazardous waste. • Do not dump spoil/waste within 50 m of natural areas; dispose of at a licensed site.	Vehicles and machinery inspected on site appeared to be in good condition with no visible leaks. Maintenance activities are limited to the designated contractors' yard, where drip trays are used during refuelling and servicing. Generators and pumps are placed on drip trays to prevent soil contamination. Spill kits are available on site, and workers have been trained in their use. No hydrocarbon contamination was recorded.
3.5	<u>Pollution Management – Ablution Facilities</u> • Install chemical toilets at the site camp on a level, secured surface.	A sufficient number of chemical toilets are available next to all the construction sites and installed at the contractors' yard on a level,

	• Locate toilets outside stormwater drainage lines; ensure no connection to the stormwater system. • Empty toilets regularly and dispose of waste at approved facilities. • Prevent spills when moving or servicing toilets.	stable surface outside of stormwater lines. Toilets are serviced regularly, with waste removed by an approved contractor to a licensed facility. No spills or leakages were observed.
3.6	<u>Pollution Management – Hazardous Substances</u> • Store hazardous substances in compliance with manufacturer requirements, including waterproof bunded structures if required. • Store hazardous substances on bunded, impermeable surfaces with 110% containment capacity.	No uncontrolled storage of hazardous substances was observed.
3.7	<u>Cement Batching</u> • Conduct batching on impermeable surfaces large enough to contain slurry/runoff. • Construct lined detention ponds if needed to capture runoff; dispose of dried cement waste at authorised facilities. • Restrict batching to already transformed areas within the project footprint. • Store unused cement bags under cover; dispose of empty bags in waste bins. • Prohibit washing cement/concrete into the ground; remove excess material and dispose of at authorised facilities.	A large mortar board is in use at the retirement village construction area to contain mixing activities and prevent slurry or wash water from contaminating the surrounding soils.
4. 4.1	Protection Of Terrestrial Ecosystem (Fauna And Vegetation) Cement must only be mixed on plastic sheets or in large buckets. Spillage must be cleaned immediately, and cement water contained, dried, and removed from site.	Cement mixing is being undertaken on a large mortar board at the retirement village construction area to contain and prevent soil contamination. No cement spills or runoff were observed during the site audit.
4.2	Vegetation clearing must be limited to the approved footprint and	Vegetation clearing has been limited to the approved footprint,

	demarcated before clearing begins.	with the boundaries demarcated prior to clearing.
4.3	No clearing may occur outside of the approved development and infrastructure footprint.	No clearing was observed outside of the approved development and infrastructure footprint.
4.4	Rescued plants must be replanted into nearby disturbed areas of similar habitat or used for rehabilitation.	Rescued plants have been replanted in disturbed areas for rehabilitation purposes. No formal list or report of rescued plants was generated. Across the site, the aloes have been replanted in open spaces and gardens landscaped with indigenous vegetation.
4.5	The ECO must oversee and monitor compliance with environmental requirements and mitigation measures.	Monthly monitoring reports are being compiled by the ECO.
4.6	Workers must be sensitised to the presence of fauna (mammals, birds, reptiles, etc.) and instructed to avoid disturbance.	Workers receive environmental awareness training as construction continues.
4.7	Any fauna encountered must be allowed to vacate the site passively. Relocation may only be done by trained personnel if necessary.	No records of relocation of sensitive fauna have been obtained.
4.8	No wild animals may be handled, removed, hunted, snared, injured, or killed by construction workers.	No incidents of handling, removing, hunting, or harming fauna were observed/recorded.
4.9	Workers may not feed, hunt, trap, poison, or shoot fauna on or near the site.	No feeding, hunting, trapping, poisoning, or shooting of fauna by workers has been recorded.
4.10	All alien plants and trees must be removed during construction, except the identified Eucalyptus tree hosting the Jackal Buzzard nest, which must remain undisturbed.	Alien plants have been cleared in line with requirements, except for the identified Eucalyptus tree hosting the Jackal Buzzard nest, which has been retained and remains undisturbed.
5.	Alien Clearing	
5.1	Alien clearing must be undertaken carefully to avoid damage to indigenous vegetation.	Alien clearing has been carried out carefully to avoid damage to indigenous vegetation.
5.2	Regular follow-up clearing is required to ensure successful rehabilitation.	Follow-up alien clearing is taking place as required to aid the rehabilitation of the conservation area.

5.3	Responsibility for alien clearing rests with the local authority, or an alien clearing contractor must be appointed if not.	Alien clearing has been managed on site in line with responsibility directives.
5.4	After clearing, an appropriate cover crop must be planted promptly where weeds or exotic species are removed.	Cover planting was noted in areas cleared of invasive vegetation to prevent erosion and re-growth.
5.5	Alien clearing must be conducted in accordance with the Alien Clearing Management Plan.	Clearing is being implemented in accordance with the Alien Clearing Management Plan.
6.	Noise	
6.1	Excavations and earth-moving activities must be limited to normal working hours (07:30–17:30) where possible.	Excavations and earthworks are taking place within normal working hours (07:30–17:30). No noise complaints have been received.
7.	Visual	
7.1	Keep the site camp neat, tidy, and free of litter at all times.	The site camp is being kept neat, tidy, and free from litter.
7.2	Manage waste according to the EMPr and maintain good housekeeping practices.	Waste management is taking place in line with the EMPr, with good housekeeping observed. Waste bins and skips are available on site, with separation between general, recyclable, and hazardous waste streams. Screening around the contractors' yard ensures controlled stockpiling of materials and rubble. The Groot Brak licensed waste facility is used for disposal, with deliveries logged in the security gate record book. At the location of the sports field, windblown litter was observed and should please be removed daily.
7.3	Plan and manage work efficiently to minimise disturbance time.	Development is occurring in a phased manner, limiting soil disturbance.
7.4	Locate site camp, storage facilities, stockpiles, waste bins, elevated tanks, and other temporary structures to reduce visual impact.	The main contractors' camp is located within Phase E, comprising storage containers and site offices for the various contractors. The camp was observed to be in a neat and well-maintained condition, with the yard fully screened and secured after hours. Facilities at the camp include a water truck for dust suppression, a fuel

		bowser, a chipper, and screened storage.
7.5	Provide visual screening (e.g. shade cloth) where required.	Phase B and the contractor's yard have been visually screened with shade cloth.
7.6	Screen highly reflective materials to minimise visual disturbance.	No highly reflective materials were observed during the site audit.
7.7	No land clearing outside the demarcated footprint.	No land clearing outside of the demarcated footprint was observed.
7.8	Conduct clearing in a phased approach to keep disturbed areas small and manageable.	Development is occurring in a phased manner, limiting soil disturbance.
8.	Method Statements	
8.1	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 site meetings the following: • Establishment of site camp and stockpile area. • Cement/ concrete batching, disposal and emergency contingencies. • Topsoil and subsoil storage/ stockpiling. • Storage of fuels and hazardous chemicals, and emergency contingencies. • Waste management system. • Stormwater management and control. • Fire Control & Fire Emergency Plan. • Emergency preparedness plan/emergency response procedure. • Post-construction rehabilitation.	According to the ECO, no digital or formal method statement has been created/developed. Site establishment, demarcation and works have been discussed with the ECO prior to commencement.
9.	Dust Control	

9.1	Avoid land clearing and earthmoving during strong winds where possible.	Construction has taken weather predictions into account.
9.2	Provide suitable cover for cleared areas as soon as possible.	The foundations for the Hartland school have been cut, and clearance of the sports field is in progress. Several vegetation debris stockpiles and topsoil stockpiles were observed within this area, many of which have naturally revegetated. A water truck is available for any dust fallout.
9.3	Protect stockpiles (topsoil, spoil, and other material) from wind erosion using netting, tarpaulin, or similar (topsoil must not be covered with tarpaulin).	Stockpiles are continuously used during construction, so covering the stockpiles a large number of stockpiles for short periods is deemed impractical. Stockpiles showed no signs of erosion during the site audit.
9.4	Position stockpiles considering prevailing wind direction to minimise dust impact.	Topsoil and subsoil stockpiles are currently located adjacent to the current works area, where the stormwater pipe and main entrance road are being installed/prepared.
9.5	Suppress dust on access roads and the site during dry periods using water or biodegradable stabilisers (without causing excessive runoff).	A water truck is available for any dust fallout.
9.6	Implement wetting down of sand heaps and exposed areas, especially on windy days.	A water truck is available for any dust fallout.
10.	Rehabilitation	
10.1	Clear site camp area of all facilities, ablution blocks, fencing, signage, waste, and surplus material after construction.	Noted, this will be monitored once construction is complete. As development continues in a phased manner, the temporary site camps are de-established and appropriately rehabilitated.
10.2	Check surfaces for waste from concreting or asphaltting and clear as approved by the ECO.	Noted. During the site audit no concrete or asphalt remains were observed.
10.3	Collect and dispose of contaminated soil as hazardous waste.	Noted and will be monitored once construction is complete.
10.4	Remove all construction waste, litter, and rubble for reuse,	Waste bins and skips are available on site, with separation

	recycling, or disposal at an appropriate facility.	between general, recyclable, and hazardous waste streams. Screening around the contractors' yard ensures controlled stockpiling of materials and rubble. The Groot Brak licensed waste facility is used for disposal, with deliveries logged in the security gate record book. At the location of the sports field, windblown litter was observed and should please be removed daily.
10.5	Prohibit burying or burning of waste/rubble on site.	Noted, no evidence of waste burning or burying was observed during the site audit. Soil stockpiles located at the location of the sport fields did contain construction material debris which should please be removed.
10.6	Scarify or rip compacted/devegetated areas within the site camp and working area.	Noted, this will be monitored once construction is complete. As development continues in a phased manner, the temporary site camps are de-established and appropriately rehabilitated.
10.7	Evenly spread stockpiled topsoil over scarified, shaped, and contoured areas.	Noted, this will be monitored once construction is complete. As development continues in a phased manner, the temporary site camps are de-established and appropriately rehabilitated.
10.8	Seed/plant hardy, drought-tolerant, non-invasive species where necessary.	Noted, this will be monitored once construction is complete.
10.9	Apply mulch to stabilise soil, retain moisture, and promote re-vegetation.	Noted, this will be monitored once construction is complete. Towards the southeastern section of the site, along the conservation area, the firebreak along the game fence has been maintained. Further along the fence towards the railroad, the soil becomes increasingly sandy. Permeable paving grids have been installed along the access track to stabilise the sandy soils and prevent erosion, supported by geogrid netting. Where slopes of sandy soil were unstable and prone to erosion, sandbags were placed to stabilise the area. Together with the ECO, the auditor recommends that once sandbags have been installed, cleared

		vegetation must be chipped and used as mulch and spread across this section to ensure proper rehabilitation.
10.10	Ensure exposed soils/topsoiled areas are re-vegetated or stabilised to ECO's satisfaction (no exposed soils left).	Noted, this will be monitored once construction is complete. As development continues in a phased manner, the temporary site camps are de-established and appropriately rehabilitated.
10.11	Use erosion protection measures where required (mulching, geotextile, brush-packing, onion bags with chips, etc.).	Noted, this will be monitored once construction is complete. Towards the southeastern section of the site, along the conservation area, the firebreak along the game fence has been maintained. Further along the fence towards the railroad, the soil becomes increasingly sandy. Permeable paving grids have been installed along the access track to stabilise the sandy soils and prevent erosion, supported by geogrid netting. Where slopes of sandy soil were unstable and prone to erosion, sandbags were placed to stabilise the area. Together with the ECO, the auditor recommends that once sandbags have been installed, cleared vegetation must be chipped and used as mulch and spread across this section to ensure proper rehabilitation.
10.12	Remove unused topsoil, subsoil, or excavated material for reuse elsewhere or disposal at an approved site.	Noted, this will be monitored once construction is complete.
10.13	Re-vegetate disturbed soils with local indigenous vegetation or other suitable cover.	Noted, this will be monitored once construction is complete.
10.14	Conduct follow-up alien clearing 6 months post-construction, and annually for 3 years (or longer if recruitment continues).	Noted, this will be monitored once construction is complete.

EMPr Compliance Rating	98.47%
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CONCLUSION

The first external environmental audit was undertaken by HilLand Environmental in December 2020. During this process, gaps in the project records were identified, leading to a PAIA application being submitted in May 2021 to retrieve the missing information. While some of the requested records were subsequently obtained, documentation relating to the notification of Interested and Affected Parties (I&APs) and formal commencement notifications remains outstanding. With the additional information that became available, HilLand Environmental carried out a follow-up audit in September 2021 to provide an updated assessment.

Since then, the Environmental Authorisation (EA) originally issued to Hartenbos Landgoed on 18 August 2009 (Ref No: EG12/2/1-AM18-Farm Vaalevalley 219/B, Mossel Bay) has undergone several amendments in 2012, 2018 and 2023, with the most recent update issued as an addendum on 18 July 2025. This addendum revised the Construction and Operational EMPs, authorised the inclusion of a 15 m telecommunication mast, and updated the development description to include 2 288 residential units, social housing, community and business zones, and 235 ha of managed open space. Additional safeguards were introduced, including requirements for alien plant control, fauna protection, vegetation screening, and visual impact mitigation.

In fulfilment of Condition 25 of the amended EA and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended), a second external audit was conducted on 7 August 2025 by Kapp Environmental Consultants (Pty) Ltd. This audit confirmed that environmental management across the site is compliant with the EA and the EMPs. Site establishment and facilities were found to be orderly, stormwater infrastructure has been effectively integrated into natural systems, and progressive rehabilitation is evident through measures such as replanting aloes, replacing kikuyu with kweek grass, and protecting sensitive habitats. Conservation buffers have been maintained, and invasive alien clearing is ongoing.

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:

A handwritten signature in black ink, appearing to be 'RK' with a stylized flourish.

Renier Kapp
for KAPPEC

ANNEXURE A – SITE PHOTOGRAPHS



Entrance to Hartland Lifestyle Estate from the MR344. Landscaping within natural vegetation.



Current main entrance to Hartland Lifestyle Estate from the MR344 through the existing culvert under the N2.



Entrance to Hartland Lifestyle Estate from the MR344. Landscaping within natural vegetation.



Existing aloe sp. retained on-site adjacent to the entrance.



Condition of the site towards Phase A.



Stormwater is conveyed via natural roadside swales.



Rehabilitated stormwater channels along the roadside.



Landscaping with indigenous trees towards the showhouse.



Natural corridor and open space landscaped with indigenous trees.



Natural corridor and open space area towards the townhouses in Phase S.



Preserved burial site secured with protective fencing to prevent disturbance.



JoJo tanks installed on-site as backup storage for potential water shortages.



Fire break and buffer area long the game fence.



Condition of the site towards Phase A as seen from Phase S.



Rehabilitated stormwater channels along the roadside.



Installation of services and earthworks for erven within Phase A, with retaining walls being established.



Installation of services and earthworks for erven within Phase A, with retaining walls being established.



Kerbs are being installed along with the installation of services in Phase A.



Installation of services and earthworks for erven within Phase A, with retaining walls being established.



Installation of services and earthworks for erven within Phase A, with retaining walls being established.



Installation of services and earthworks for erven within Phase A, with retaining walls being established.



Installation of services and earthworks for erven within Phase A, with retaining walls being established.



Topsoil stockpiles from the excavation site of the proposed school.



View of the construction area towards the school.



Levelled, shaped and cut school area.



View of the construction area towards the school.



Stormwater outlet structure from Phase A and erf 7380.



Temporary stormwater swales for natural stormwater diversion adjacent the entrance road of erf 7380.



Landscaping with aloes found on site during site clearance.



Entrance to the conservation area, footpaths available.



Stormwater inlet and outlet structure.



Natural vegetation corridors.



Natural vegetation corridors between Phase R and the conservation area entrance.



Condition of the construction camp adjacent to Erf 7380, chemical toilet in place.



Condition of the construction camp adjacent to Erf 7380.



Condition of the construction camp adjacent to Erf 7380, skip is still available for waste management.



Site office being de-established adjacent to Erf 7380.



On-site tuckshop.



Construction of townhouses within Phase D.



Construction of townhouses within Phase D.



Condition of site towards Phase E.



Eucalyptus trees still to be remove within Phase D



Jackal Buzzard.



Topsoil and subsoil stockpiles of cleared erven within Phase D and A.



Topsoil and subsoil stockpiles of cleared erven within Phase D and A.



Chemical toilet in place where services area being installed in Phase D.



Suggested existing hedgerow located within the development footprint of the sports fields.



Suggested existing hedgerow located within the development footprint of the sports fields.



Suggested existing hedgerow located within the development footprint of the sports fields.



Proposed location of the sports fields.



Stockpiles of vegetation and debris during the clearance of the site for the sports field and school area.



Proposed location of the sports fields.



Proposed location of the sports fields. Stockpiles of excavated soil and debris.



Proposed location of the sports fields.



Condition of the main site camp within Phase E. Storage containers for each contractor currently commissioned.



Condition of the main site camp within Phase E. Storage containers for each contractor currently commissioned.



Condition of the main site camp within Phase E.



Condition of the main site camp within Phase E.



Fire break buffer adjacent to N2, along the game fence.



Nursery trees for rehabilitation and landscaping purposes.



Main access road being constructed and services installed. Water truck available for dust fallout.



Main site camp within Phase E appropriately screened.



Topsoil and subsoil stockpiles separated during the excavation of the main access road and service installations.



Main access road being constructed and services installed.



Main access road being constructed and services installed.



Main access road being constructed and services installed. Water truck available for dust fallout.



Main access road being constructed and services installed.



Main site camp within Phase E appropriately screened.



Portable toilets adjacent to the site offices and main site camp.



Dalmar site office.



Site offices located within the screened site camp within Phase A adjacent to the N2.



Condition of the main site camp within Phase E adjacent to the N2.



Storage containers available at the main site camp within Phase E adjacent to the N2.



Water truck available at the main site camp within Phase E adjacent to the N2.



Fuel bowser available at the main site camp within Phase E adjacent to the N2.



Chipper available at the main site camp within Phase E adjacent to the N2.



Phase B construction site camp.



Recreational area adjacent to the retirement village and conservation area.



Recreational area adjacent to the retirement village and conservation area.



Entrance to the retirement village within Hartland.



Construction area along Phase B screened within green netting to limit visual intrusion.



Construction area along Phase B screened within green netting to limit visual intrusion.



View of the natural area between the retirement village units.



Retention pond for stormwater management designed within the existing hydrological area.



Existing and formalised hydrological area running through the retirement village.



Retention pond for stormwater management designed within the existing hydrological area.



Retention pond for stormwater management designed within the existing hydrological area.



Final finishes of retirement units within Phase C.



Electrical connections being prepared for distribution to various service points.



Internal road network for retirement village.



Condition of the construction area within the retirement village.



Construction of retirement units within Phase C.



Condition of the construction area within the retirement village.



Cement batching active with large mortar boards in place.



Condition of the construction area within the retirement village.



Setting out of foundation lines marked on site in preparation for excavation.



Material stockpiles within the construction area of Phase C.



Construction of retirement units in Phase C.



Chemical toilet located within the development area of Phase C – retirement village.



Open space area towards the conservation area.



Firebreak cleared along the game fence.



Firebreak cleared along the game fence.



Permeable paving grids installed along the access track to stabilise sandy soils and prevent erosion.



Geogrid netting installed to stabilise sand and manage erosion.



Vegetation removed along the maintenance track along the property boundary.



Vegetation removed along the maintenance track along the property boundary.



Sandbags placed along the property boundary to stabilise sections of unstable soil.



Phase C – Retirement Village boundary fence.



No-go fence erected surrounding the sensitive areas.



No-go fence erected surrounding the sensitive areas with appropriate signage.



No-go fence erected surrounding the sensitive areas.



Existing Eucalyptus trees for the Jackal Buzzard along Phase C, the recreational area, and conservation area.



Ring road surrounding the development boundary.



Owl boxes within the conservation section of the development.



Access footpath towards the guard building and Kleinbrak Estuary.



Access footpath towards the guard building and Kleinbrak Estuary.



Jojo tank used for water storage for the bathroom at the guard building.



Guard building at the Kleinbrak Estuary access route.



Guard building at the Kleinbrak Estuary access route.



Conservancy tank for toilet system, pumped out regularly.



Conservancy tank for toilet system, pumped out regularly.



Designated open space area that accommodates cycling and running tracks.



Designated open space area that accommodates cycling and running tracks.



Condition of the development area of Phase H towards the North.



Open spaces to be developed.



Existing Milkwood tree kept within the road designs.