

ATT: D'MITRI MATTHEWS

PROPOSED DEVELOPMENT OF ERF NO. 8892, PAARL.

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/B3/28/1002/25
NEAS REF. NO. WCP/EIA/AMEND/0000905/2025



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KAPPEC

26 September 2025

DETAILS OF THIS REPORT

Status of this Report	Final Regulation 34 External Compliance Audit Report
Date Submitted	September 26, 2025
Public Review Period	Not Applicable
Report Title	Proposed Development of Erf No. 8892, Paarl.
Applicant	Managing Director Bello Campo (Pty) Ltd P. O. Box 43 Somerset Mall 7137 H. Campbell Tel.: (021) 850 9680 Email: murray@arun.co.za
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 The logo for KAPP Environmental Consultants features a stylized green leaf and blue water droplet icon to the left of the word 'KAPP' in large, bold, dark grey letters. Below 'KAPP' is the text 'ENVIRONMENTAL CONSULTANTS' in a smaller, all-caps, dark grey font.	

DISCLAIMER

This report has been prepared for Bello Campo (Pty) Ltd, represented by H. Campbell, 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

26 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

Appendix A:	Site Photographs
Appendix B:	Site Development Plan
Appendix C:	Copy of Original EA
Appendix D:	Copy of Amended EA
Appendix E:	Copy of EMPr
Appendix F:	Commencement Notification and I&AP Database
Appendix G:	ECO reports
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INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated August 2025, by Bello Campo (Pty) Ltd, represented by H. Campbell (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 17 of the Environmental Authorisation and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was initially granted to Bello Campo (Pty) Ltd. on 2 December 2022, in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended), under DEA&DP reference 16/3/3/1/B3/28/1032/22.

Subsequently, a Part 1 Amendment was submitted to amend the approved residential densities and project description. This amendment was approved on 21 February 2025 (DEA&DP Ref. 16/3/3/5/B3/28/1002/25). However, an appeal against this amendment was lodged by the Paarl Golf Club on 17 March 2025. The appeal was ultimately dismissed by the Minister on 20 May 2025, thereby upholding the approval of the amendment.

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

The methodology followed for conducting the environmental audit included:

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

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

TABLE 1: COMPLIANCE RATING

Colour	Compliance Rating Significance
GREY (N/A)	A grey item indicates that a compliance rating is not relevant. Item is listed for awareness although will not/cannot be rated.

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

PROJECT DESCRIPTION

The proposed development on Erf 8892, Paarl (Firwoods) entails the establishment of a mixed-use residential estate, designed to retain the agricultural character of the site while accommodating a range of residential typologies. The site is located in Southern Paarl, south of the N1, and gains access from New Eskdale Street. The Berg River borders it to the south, Boschenmeer Golf Estate beyond, a small light industrial area to the west, the De Zoete Inval residential area further west, and continuing agricultural land along its southern boundary. The site is currently under cultivation with vineyards and fruit trees, and includes the Firwoods manor house, a storage shed, and several labourer dwellings.

The development has been designed to provide a transition from urban to rural landscapes, in line with the Drakenstein Municipal Spatial Development Framework (2020), which identifies the property within the urban edge. Approximately 50% of the site will remain agricultural, preserving the existing rural character, while introducing residential opportunities to meet growing urban demand.

The development will comprise:

- 14 Gentleman's Estates
- 79 Townhouses
- 89 Dwelling Housing opportunities.
- Private Open Space Zone
- Internal roads.
- An Agriculture Zone.
- The construction of a series of retention ponds, located outside of the agricultural zoned area, that will serve as stormwater management.

The development also includes the construction of pedestrian footpaths along the Berg River, the removal of the existing berm adjacent to the river, and the rehabilitation of the riparian zone through a Maintenance Management Plan (MMP). These interventions, supported by consultation with SAS Environmental and the Department of Water and Sanitation, are intended to improve flood resilience. To mitigate the proposed infilling of approximately 70 000 m² within the 1:100-year floodline, a system of excavated depressions with a storage capacity of 50 000 m³ will be created, allowing for improved drainage and flood attenuation.

Bulk services will be provided via existing municipal infrastructure, with necessary upgrades confirmed at the detailed design stage:

- Potable water supply will be drawn from the Courtrai reservoir.
- A new internal sewer network will connect to the existing bulk sewer system, with upgrades

to the current gravity main.

- Electrical supply will be distributed via a private 11kV ring network with substations and private metering.
- Waste management will be directed to the nearest municipal landfill, with rubble and general waste disposed of appropriately.

Access to the development will be provided primarily from New Eskdale Street, approximately 400m from the N1 on-ramp. A secondary access, located about 150m south-west of the main entrance, will serve as an emergency and construction access.

The development is compatible with its surrounding land uses, which include industrial, residential, agricultural, and recreational (golf estate) activities. It contributes to forward-planning goals by utilising underutilised land within the urban edge for medium-density residential use.

LISTED ACTIVITIES

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

Activity Number: 12

Activity Description:

- (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or
- (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs—
 - (a) within a watercourse;
 - (b) in front of a development setback; or
 - (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; —excluding—
 - (aa) the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour;
 - (bb) where such development activities are related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;
 - (cc) activities listed in activity 14 in Listing Notice 2 of 2014 or activity 14 in Listing Notice 3 of 2014, in which case that activity applies;
 - (dd) where such development occurs within an urban area;
 - (ee) where such development occurs within existing roads, road reserves or railway line reserves; or
 - (ff) the development of temporary infrastructure or structures where such infrastructure or structures will be removed within 6 weeks of the commencement of development and where indigenous vegetation will not be cleared.

The development entails the establishment of a 950m long footpath along the Berg River. The development footprint of the footpath will approximately 1668m².

Activity Number: 19

Activity Description:

- The infilling or depositing of any material of more than 10 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10 cubic metres from a watercourse; but excluding where such infilling, depositing, dredging, excavation, removal or moving—
- (a) will occur behind a development setback;
 - (b) is for maintenance purposes undertaken in accordance with a maintenance management plan;
 - (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;
 - (d) occurs within existing ports or harbours that will not increase the development footprint of the

port or harbour; or

(e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.

A berm of approximately 19 221 m³ directly adjacent to and, in some parts, encroaching into the delineated edge of the Berg River, will be removed.

Activity Number: 28

Activity Description:

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

(i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares;
or

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

The proposed residential development will be located outside of the urban area and on land previously used for agriculture. The total extent of land to be developed will be bigger than 1ha.

REGULATION 34 EXTERNAL AUDIT REQUIREMENTS

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

Environmental audit report

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

Objective of the environmental audit report

The objective of the environmental audit report is to

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

Content of environmental audit reports

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

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

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



FIGURE 1: SITE DEVELOPMENT PLAN

CONDITIONS OF AUTHORISATION

TABLE 2: ENVIRONMENTAL AUTHORISATION GENERAL CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
1.	The holder is authorised to undertake the listed activities specified in Section B above in accordance with, and restricted to, the Layout Alternative 1, described in the BAR, dated August 2022, at the site as described in Section C above.	Noted. All listed activities and the preferred alternative as outlined in the EA in being implemented accordingly.
2.	The holder must commence with, and conclude, the listed activities within the stipulated validity period which this Environmental Authorisation is granted for, or this Environmental Authorisation shall lapse and a new application for Environmental Authorisation must be submitted to the competent authority. This Environmental Authorisation is granted for- (a) A period of five (5) years, from the date of issue, during which period the holder must commence with the authorised listed activities. (b) A period of 10 years, from the date the holder commenced with the authorised listed activities, during which period the authorised listed activities must be concluded.	DEA&DP was notified of the intended commencement of work on January 10, 2025, and civil services commenced with work at the end of January. The EA was granted on the 2nd of December 2022, and the authorised listed activities commenced in January 2025, 3 years after the EA was issued within the 5-year period.
3.	The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.	Noted. The holder remains responsible for all persons acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the Holder.
4.	Any changes to, or deviations from the scope of the alternative described in Section B above must be accepted or approved, in writing, by the Competent Authority before such changes or deviations may be implemented. In assessing whether to grant such	Noted. No changes or deviations from the scope of the project description have occurred since the final amended Environmental Authorisation (EA) was approved. The amendment applied for falls under Part 1 of Chapter 5 of the

	acceptance/approval or not, the Competent Authority may request information, in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.	NEMA EIA Regulations, 2014 (as amended) and does not alter the scope of the EA issued on 2 December 2022. Furthermore, the amendment does not trigger any new listed activities under the NEMA EIA Regulations, 2014 (as amended) (Listing Notices 1, 2, and 3 in Government Gazette No. 40772 of 7 April 2017) and will not result in an increased level or nature of impacts beyond those assessed during the initial EA application. A Part 1 Amendment was submitted to amend the approved residential densities and project description and was approved on 21 February 2025 (DEA&DP Ref. 16/3/3/5/B3/28/1002/25). An appeal lodged by the Paarl Golf Club on 17 March 2025 was dismissed by the Minister on 20 May 2025, thereby upholding the amendment approval.
5.	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of construction activities. The notice must: 5.1 make clear reference to the site details and EIA Reference number given above; and 5.2 include proof of compliance with the following conditions described herein: Conditions: 6, 7, 12 and 13	DEA&DP was notified of the intended commencement of work on January 10, 2025, and made clear reference to the site details, EIA Reference, and proof of compliance as referred to below: Condition 6: Please refer to all the I&AP notification proof attached to the email. Condition 7: Environmental Authorisation has been issued on the 02nd of December 2022. It is proposed to commence with activities within 2 weeks. Condition 12: A Storm Water Management Plan has been compiled. The approval for Drakenstein Municipality will be submitted. Condition 13: Guillaume Nel Environmental Consultants

		(GNEC) has been appointed as the Environmental Control Officer (ECO) to conduct audits on environmental compliance and will subsequently submit a monthly report to your Department.
6.	The holder must in writing, within 14 (fourteen) calendar days of the date of this decision– 6.1 notify all registered Interested and Affected Parties (“I&APs”) of – 6.1.1 the outcome of the application; 6.1.2 the reasons for the decision as included in Annexure 3; 6.1.3 the date of the decision; and 6.1.4 the date when the decision was issued. 6.2 draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeals Regulations, 2014 (as amended) detailed in Section G below; 6.3 draw the attention of all registered I&APs to the manner in which they may access the decision; and 6.4 provide the registered I&APs with: 6.4.1 the name of the holder (entity) of this Environmental Authorisation; 6.4.2 name of the responsible person for this Environmental Authorisation; 6.4.3 postal address of the holder; 6.4.4 telephonic and fax details of the holder; 6.4.5 e-mail address, if any, of the holder; and 6.4.6 contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations (as amended).	The I&APs were notified of the original EA on 5 December 2022, three days after its issuance, and of the Part 1 Amended EA on 25 February 2025, the same day the amendment was issued. An appeal against the amendment was lodged by the Paarl Golf Club on 17 March 2025. The appeal was ultimately dismissed by the Minister on 20 May 2025. The appeal lodged by the Paarl Golf Club was dismissed because the Minister found no substantive grounds to overturn the Department’s decision to approve the Part 1 Amendment. It was determined that the amendment did not trigger any new listed activities, would not increase environmental impacts beyond those already assessed, and remained consistent with the scope and conditions of the original Environmental Authorisation.

7.	The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notifies the registered I&APs of this decision. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided i.e. the listed activities, including site preparation, must not commence until the appeal is decided.	The I&APs were notified of the original EA on 5 December 2022, three days after its issuance. DEA&DP was informed of the intended commencement of work on 10 January 2025, and civil services commenced at the end of January 2025. The Part 1 Amended EA was issued on 25 February 2025, with I&APs notified on the same day. An appeal against the amendment was lodged by the Paarl Golf Club on 17 March 2025, during which period all activities were halted until the appeal was decided. The Minister ultimately dismissed the appeal on 20 May 2025, thereby upholding the approval of the amendment.
8.	The draft Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation is hereby approved and must be implemented.	Noted, the EMPr is being implemented.
9.	The MMP adopted as part of this Environmental Authorisation must be implemented.	Noted, the MMP has been included in all construction documentation and is being implemented.
10.	The EMPr and MMP must be included in all contract documentation for all phases of implementation.	The approved EMPr and MMP have been included in the contract documentation.
11.	The Rehabilitation and Alien Clearing Management Plan dated 25 October 2021 must be implemented.	Noted, the Rehabilitation and Alien Clearing Management Plan is being implemented on site on an ongoing basis.
12.	A Stormwater Management Plan must be submitted to the Drakenstein Municipality for approval. The approved Stormwater Management Plan must be submitted to this Department prior to the commencement of construction activities on the site.	The Stormwater Management Plan was submitted to the Drakenstein Municipality and was approved on the 3rd of December 2024.
13.	The holder must appoint a suitably experienced environmental control officer ("ECO"), before commencement of any construction activities to ensure compliance with the EMPr and the conditions contained herein.	Guillaume Nel Environmental Consultants (GNEC) has been appointed as of January 2025 as the Environmental Control Officer (ECO) to conduct audits on environmental compliance and will subsequently submit a monthly report to your Department.

14.	The ECO must conduct fortnightly monitoring inspections during the construction phase. Monthly Environmental Compliance Reports must be compiled and must be submitted to the Competent Authority for the duration of the construction phase. The final Environmental Compliance Report must be submitted to the Competent Authority within one month of construction having been completed.	Noted, GNEC is conducting biweekly site visits during the installation of civil services, and monthly reports are submitted to the Competent Authority. Monthly site visits will be conducted during the construction phase.
15.	A copy of the Environmental Authorisation, EMPr, MMP, audit reports and compliance monitoring reports must be kept at the site of the authorised activities, and must be made available to anyone on request, including a publicly accessible website.	An environmental file is available on-site and includes all the necessary documentation.
16.	Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.	Access to the site was permitted via New Eskdale Street, approximately 400m from the N1 on-ramp.
17.	In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder must conduct environmental audits to determine compliance with the conditions of the Environmental Authorisation, the EMPr and the MMP. The Environmental Audit Report must be prepared by an independent person that is not the ECO referred to in Condition 10 or the EAP and must contain all the information required in Appendix 7 of the NEMA EIA Regulations, 2014 (as amended). Environmental Audit Reports must be submitted to the Competent Authority during the construction phase. The first Environmental Audit Report must be submitted three months after the commencement of construction activities and every twelve (12) months thereafter. A final Environmental Audit Report must be	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated August 2025, by Bello Campo (Pty) Ltd, represented by H. Campbell (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 17 of the Environmental Authorisation and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

	submitted within three months of the construction phase having been completed. The holder must, within 7 days of the submission of an environmental audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report immediately available to anyone on request and on a publicly accessible website (where the holder has such a website).	
18.	Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains include: meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; and/or graves or unmarked human burials including grave goods and/or associated burial material.	No heritage remains were exposed during excavations as per the ECO reports provided, thus far.
19.	A qualified archaeologist and/or palaeontologist must be contracted where necessary (at the expense of the holder) to remove any heritage remains. Heritage remains can only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant heritage resources authority.	Noted. A qualified archaeologist and/or paleontologist will be contacted should any heritage remains be discovered on site.

EA Compliance Rating	91.96%
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SITE AUDIT FINDINGS

An external environmental audit was conducted on 19 August 2025 in accordance with the conditions of the Environmental Authorisations and the EMPr. Access to the site was obtained via New Eskdale Street, adjacent to the Firwoods Homestead, where a previously erected beacon remains in place and will be retained.

The construction team has commenced with civil services installation, including stormwater infrastructure. The main access road and corresponding internal roads are being excavated and prepared. Preparation for asphalt surfacing has begun, with the road surface chipped and sprayed. Towards the northwest along the main access road, kerbs have been installed, and the road has been partially surfaced with asphalt. The southwestern section, adjacent to the foreman's house, is also under preparation.

Along New Eskdale Street, the western Clearvu boundary wall is being installed, along with fibre infrastructure. Traffic management measures are in place and actively implemented along the access route. All asphalt mixing occurs within a properly bunded area. A mortar board is available on-site, and ready-mix cement is being used for kerb installations. No packaging materials were observed scattered on site. All waste is contained within wire structures and bins within the site camp.

The site camp is in good working condition, with lockable storage containers housing signage. A chemical toilet is available for workers, and permanent toilet structures are also located adjacent to the site camp. Construction materials and stockpiles have been placed adjacent to the site camp, which has been screened to reduce visual impact.

The worker houses to the northwest, adjacent to the original Firwoods Homestead, have been systematically demolished. The demolished material has been crushed for reuse as G7 material for road surfaces. The existing Firwoods Homestead will be retained as required for heritage purposes.

The majority of the eastern area has been cleared, where unproductive vineyards were removed; these will be reinstated with new vines. Following reinstatement, this area is designated for agricultural use in accordance with the Site Development Plan (SDP). Cleared vegetation has been placed in a designated section northwest of the site camp.

A large stormwater pond has been constructed in the wet area southeast of the site camp and Firwoods Homestead. Stormwater pipelines have been installed to channel water from the large pond to smaller ponds towards the north, with an outlet channel directing flow into the Berg River. A temporary road has been created adjacent to this outlet channel.

Previously dumped construction material northwest of the site, resulting from earlier mall development, is being reused by the construction team. In the southwestern area adjacent to the foreman's house, stockpiles have been organised to separate construction materials from topsoil. All topsoil stockpiles have been revegetated to prevent erosion and runoff. A water truck is available on-site for dust suppression.

At the southern section of the site, a stormwater channel and culvert have collapsed. The contractor has excavated a new stormwater channel, which has been formalised. Recent rainfall has filled this excavated channel, and sandbags were placed to control water flow and prevent erosion.

No litter other than the crushed material was observed on site. The site remains in good, near-pristine condition, with no spills, erosion, or sedimentation noted during the audit.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 3: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Stormwater Management	
1.1	Install oil/water separators at stormwater outfalls from parking areas before discharge into the stormwater pond.	Noted. The parking area has not been constructed yet. This requirement must be implemented before discharge into the stormwater pond.
1.2	Place prominent safety signage near stormwater attenuation and treatment facilities, warning of rising water levels and potential contamination during storm events.	Noted. The stormwater attenuation pond is being constructed, and signage warning of rising water levels and potential contamination during storm events will be installed after construction.
1.3	Construct appropriate fencing (e.g., clear-view or concrete palisade) around stormwater facilities, in consultation with the TDA: Asset Management and Maintenance Department.	Stormwater facilities are still being constructed, and fencing will be erected once complete.
1.4	Mortar mixing must not occur in gutters or any area draining to the stormwater system.	Mortar mixing was observed on a mortar board away from any gutters or stormwater drainage areas.
1.5	Brick cutting wastewater must be contained and prevented from entering stormwater drains.	No brick cutting is currently occurring on-site.
1.6	Paint and plaster waste must not be discharged into stormwater drains; residues should be collected and disposed of appropriately.	No painting or plastering is currently occurring on-site.
1.7	Designated mixing areas for cement, plaster, and other materials must be used, away from stormwater outlets.	Designated mixing areas are in place adjacent to the works area where the road area is being chipped and sprayed, and mortar boards are used consistently.
1.8	Waste storage areas must be maintained in a neat, contained condition to prevent runoff contamination.	All waste on-site is contained within wire structures and bins within the site camp.
1.9	On removal of the earthed berm along the Berg River, rehabilitate the embankment with a 5:1 slope and develop a site-specific	The earthed berm along the Berg River has not yet been removed; rehabilitation plans must include a 5:1 slope and indigenous

	rehabilitation and maintenance plan, including landscaping and indigenous plant species selection.	landscaping when removal occurs.
1.10	Ensure hydrological drivers for ponds come only from precipitation and stormwater runoff; no additional water sources should be used for aesthetic purposes.	Stormwater ponds have been constructed and receive only precipitation and site runoff, with no additional water sources observed.
1.11	Design all swales to meander naturally, with slopes no steeper than 4:1 (preferably 5:1), lined with excavated cobbles for energy dissipation and erosion prevention.	Stormwater channels towards the Berg River towards the Northwest have been constructed. Where further work occurs, slopes must not exceed 4:1 and must be lined with cobbles for erosion prevention.
1.12	Vegetate swales with indigenous wetland species; optional wooden boardwalks may be installed for pedestrian crossings if desired.	Noted. Swales have not yet been designed. This will be implemented at a later stage.
1.13	Construct ponds to a maximum depth of 1 metre (preferably 700 mm) with varied depths to enhance habitat diversity and prevent <i>Typha capensis</i> overgrowth.	The large stormwater pond has been constructed; final shaping to ensure maximum depths of 1 metre or less, with varied depths for habitat diversity, must be confirmed.
1.14	Use in-situ material for swale and pond construction to avoid contamination; use cobbles or stone to increase surface roughness and habitat value.	Excavated in-situ material has been used for pond construction, reducing contamination risks.
1.15	Establish a 5–10 metre conservation buffer around swales and ponds, vegetated with indigenous species for ecological corridors and stormwater polishing.	Conservation buffers of 5–10 metres have not yet been established; this must form part of the rehabilitation phase.
1.16	Design outlet structures to the Berg River as open swales rather than culverts, joining the river at an acute angle at the same bed level to prevent erosion.	Outlet structures to the Berg River have been constructed as channels. The stormwater outlet channel has been designed on the same angle as the riverbed.
1.17	Divert stormwater from the upper property using swales with suitably sized box culverts beneath roads; install litter traps where required.	Stormwater infrastructure is busy being installed across the site. Stormwater will be diverted using swales and the 2 stormwater attenuation ponds east of the Firwoods homestead, along with the formalised stormwater infrastructure.

1.18	Implement alien plant control measures across the property, particularly along the Berg River boundary.	Alien clearing will occur continuously as construction continues.
1.19	Restrict footpaths near the Berg River to earth, single-track pathways; no imported materials or hard infrastructure allowed in the riparian zone.	Noted. No footpaths have been constructed along the Berg River yet, this will be monitored at a later stage.
2.	Stockpiles	
2.1	All stockpiled material must be placed in approved, demarcated areas only.	All stockpiled materials are placed in approved and demarcated areas adjacent to the site camp, works areas, and towards the southwest of the site adjacent to the foreman's house.
2.2	Access to stockpiles must not cause environmental damage to surrounding properties.	Access to stockpiles has been organised to ensure no environmental damage occurs to surrounding properties, as evidenced by neat and separated stockpile areas.
2.3	The spread of stockpiled material must be minimised, and material must be kept neat and contained.	Stockpiled material is kept neat and contained, with construction materials separated from topsoil stockpiles in the southwestern area.
2.4	During strong winds or rain, all stockpile material must be covered with tarpaulins to prevent erosion.	Material stockpiles are continuously reused. Topsoil stockpiles have been revegetated with no erosion evident.
2.5	Stormwater runoff from stockpiles must be directed into the stormwater system.	Stormwater runoff from stockpiles has been managed effectively, with no sedimentation or erosion observed during the audit.
2.6	Erosion control measures must be implemented if signs of erosion are visible on stockpiles.	No signs of erosion were noted on any stockpiles; all areas appear stable and well-maintained.
2.7	Soils from different horizons must be kept separate to prevent contamination of topsoil by subsoil material.	Topsoil and construction materials stockpiles have been clearly separated.
2.8	Topsoil stockpiles must be monitored for invasive vegetation growth and remediated when required.	Topsoil stockpiles have been revegetated to prevent erosion, and no invasive vegetation was observed.
2.9	No workers, plants, or construction activities may be allowed on topsoil stockpiles.	Noted: Topsoil, subsoil, and construction material stockpiles have been strategically placed to minimize surrounding traffic

		disruptions.
2.10	Topsoil stockpiles must be clearly demarcated as no-go areas.	No demarcations of topsoil stockpiles are in place; note that a notice board can be erected surrounding the stockpiles.
2.11	Stockpiles must not exceed two metres in height to prevent compaction and maintain soil integrity.	Stockpiles do not exceed the recommended height of 2 metres.
3.	Oils and Chemicals	
3.1	Oils and chemicals must be confined to specific, secured areas within the contractor's camp in a way that prevents pollution, even during heavy rainfall.	Lockable storage containers are available within the site camp, housing all oils and chemicals used on-site.
3.2	Storage areas must be imperviously bunded with adequate containment capacity of at least 1.1 times the volume of the fuel stored.	Storage containers are properly bunded, with adequate containment observed for the fuels and oils stored on site.
3.3	Drip trays with a minimum depth of 10 cm must be placed under all machinery and vehicles.	No fuel-powered machinery was observed on site that would require the use of drip trays. The site camp will be formalised during the construction of the gentleman's residences.
3.4	The surface area of each drip tray must be large enough to catch any hydrocarbons that may leak from the vehicle while stationary.	No fuel-powered machinery was observed on site that would require the use of drip trays.
3.5	The depth of each drip tray must be sufficient to contain the full volume of oil present in the vehicle.	No fuel-powered machinery was observed on site that would require the use of drip trays.
3.6	Any spills larger than 100 litres must be reported to all local authorities.	No spills within the site camp or surrounding works areas were observed during the site audit.
3.7	Spill kits must be available on-site and in all vehicles that transport hydrocarbons for refuelling or dispensing.	The necessary spill kit is available within the site offices.
3.8	All spilled hazardous substances must be collected and contained in impermeable containers.	No spills within the site camp or surrounding works areas were observed during the site audit.
4.	Cement	
4.1	Ready-mix cement must be used as far as possible to minimise	Ready-mix cement is being used for kerb installations.

	environmental impact.	
4.2	Cement batching areas must be approved by the RE, EO, or ECO to ensure residues are contained and locations avoid sensitive areas such as drainage lines or stormwater channels.	All active cement batching is taking place adjacent to the work areas and is contained within mortar boards or other suitably bunded facilities.
4.3	Concrete mixing must only take place at designated sites on mortar boards or similar structures to prevent run-off into natural vegetation, soils, or streams.	All active cement batching is taking place adjacent to the work areas and is contained within mortar boards or other suitably bunded facilities.
4.4	Cleaning of cement mixing and handling equipment must be done using proper cleaning trays.	Noted. No cleaning of handling equipment was observed during the site audit; no cement remains were observed.
4.5	All empty containers must be stored in a dedicated area and removed from the site for disposal at a licensed landfill.	Empty cement bags have been placed in plastic bags and disposed of within a trailer as well as in the wire waste structure located in the site camp.
4.6	Empty cement bags must be collected immediately to prevent cement dust from being blown away.	Empty cement bags have been placed in plastic bags and disposed of within a trailer as well as in the wire waste structure located in the site camp.
4.7	Empty cement bags must be stored in a weatherproof and scavenger-proof bin to prevent leaching and groundwater contamination.	Empty cement bags have been placed in plastic bags and disposed of within a trailer as well as in the wire waste structure located in the site camp.
4.8	Cement dust is hazardous, and any spillage must be investigated, and immediate remedial action taken.	No cement remains or dust fallout were observed during the site audit.
4.9	Visible remains of concrete, including solids and washings, must be physically removed immediately and disposed of at a licensed landfill.	No solid cement remains were observed during the site audit.
4.10	Washing cement remains into the ground is prohibited.	No solid cement remains were observed during the site audit.
4.11	Cement silos used on-site must be fitted with appropriate air pollution control equipment to control dust during fill-up operations.	Noted, cement mixers are in good working condition.
5.	Dangerous and Toxic Materials	

5.1	Materials such as fuel, oil, paint, herbicides, and insecticides must be sealed and stored in bermed areas or under lock and key in well-ventilated areas.	Lockable storage containers are available within the site camp, housing all oils and chemicals used on-site.
5.2	Storage facilities must be bunded, roofed, secure, and protected against rain, wind, and tampering.	Storage containers are properly bunded, with adequate containment observed for the fuels and oils stored on site.
5.3	Storage areas must display the required safety signs, including “No Smoking,” “No Naked Lights,” and “Danger,” and containers must be clearly marked to indicate their contents and safety requirements.	Safety signs are displayed on storage areas, and containers are clearly marked to indicate contents and safety requirements.
6.	Bulk Storage of Fuels and Oils	
6.1	Bulk fuel storage tanks on site must be placed on an impervious, bunded surface able to contain at least 110% of the tank’s volume.	No bulk fuel storage is currently taking place on-site.
6.2	Bulk fuel storage tanks must be located in areas of the construction camp where the risk of water pollution is minimal.	No bulk fuel storage is currently taking place on-site.
6.3	Bulk fuel storage tanks must be positioned away from traffic to minimise the risk of ruptures or damage from vehicles.	No bulk fuel storage is currently taking place on-site.
6.4	Fuel dispensing areas must be isolated from surface runoff generated elsewhere on site using surface grading or diversion drains.	No bulk fuel storage is currently taking place on-site.
6.5	Cleaning or wash waters from fuel dispensing areas must not be discharged directly or indirectly into stormwater systems.	No bulk fuel storage is currently taking place on-site.
6.6	Runoff from fuel dispensing areas must be directed to a separate, well-maintained system with appropriate pre-treatment facilities before discharge to sewer or temporary storage.	No bulk fuel storage is currently taking place on-site.
7.	Crew Camps and Construction Lay Down Areas.	
7.1	Keep the site camp neat, tidy, and free of litter at all times.	The site camp is kept neat, tidy, and free from litter.
7.2	Two refuse bins with lids must be provided in the eating area and	Bins are available from the site camp for contractors to use.

	emptied daily. The refuse bins must be secure, weatherproof, windproof, and scavenger-proof.	
7.3	Designated smoking areas must be provided.	Designated smoking areas have been established with a sand bucket available.
7.4	No fires may be lit outside facilities designed to contain them, and the location must be approved by the EO and ECO.	No evidence of fires was observed during the site audit, except for the controlled burning of vineyards conducted under the obtained burning permit.
7.5	No domestic or wild animals are allowed on the site, and feeding of stray animals is prohibited.	Domestic or wild animals are not permitted on the site, and feeding of stray animals is prohibited.
7.6	All litter, including concrete bags, must be collected and placed into closed bins.	Empty cement bags have been placed in plastic bags and disposed of within a trailer as well as in the wire waste structure located in the site camp.
7.7	The contractor must provide all sanitary facilities for workers and subcontractors.	Sanitary facilities are provided for all workers and subcontractors.
7.8	At least one chemical toilet must be provided per 15 persons.	Permanent toilets are available adjacent to the site camp, and 2 chemical toilets are located within the site camp for use.
7.9	All toilets must be approved by the ECO and local authority and kept clean and hygienic.	All ablution facilities appear to be in good working condition.
7.10	Toilet paper and dispensers must be provided and stocked at all times.	All ablution facilities appear to be in good working condition.
7.11	Toilets must be located within 150m of the work area and within the contractor's camp unless otherwise approved by the RE, EO, or ECO.	Permanent toilets are available adjacent to the site camp, and 2 chemical toilets are located within the site camp for use.
7.12	A reputable toilet servicing company must maintain and clean all toilets regularly, including before holidays.	Ablution facilities are serviced every 2 weeks according to the ECO.
7.13	All toilets must be secured to the ground and have functional locking mechanisms at all times.	All ablution facilities are secured to the ground with a functional locking mechanism.

7.14	Workshop areas must be monitored for oil and fuel spills, and any spills must be cleaned using environmentally friendly products such as Sunsorb.	No spills were observed or reported during the site audit.
7.15	An emergency spill kit must be available at all times on-site.	The necessary spill kit is available within the site offices.
7.16	Dust fallout in the contractor's camp must be monitored, and dust suppression measures must be applied when required.	A water truck is available on-site for dust suppression. No dust fallout is evident due to the recent rainfall.
7.17	At the end of construction, the contractor must remove all structures, equipment, and litter, restore topsoil, and prepare areas for landscaping.	Noted. Rehabilitation of the site camp will be monitored after construction within that section is complete.
8. 8.1	Method Statements Before the contractor(s) begins each construction activity the Contractor and Site Agent shall, prior to the commencement of such activity involving construction, maintenance or rehabilitation, give the ECO a written plan / discuss and approve at site meetings the following: • Emergency spills procedures for the contamination of soils from spills and fire. • Handling & storage of oils and chemicals. • Cement and concrete batching, which includes the storage, washing & disposal of cement, packaging, tools and plant. • Diesel tanks and refuelling procedures. • Crew camps and construction lay down areas. • Workshop maintenance and cleaning of plant.	The following method statements were provided to the ECO. • Cleanliness of public roads and traffic management Please refer to the environmental file on-site, which contains all the necessary hard-copied method statements.
9. 9.1	Dust Control Potable water may not be used; alternative sources such as greywater must be investigated and approved for dust suppression. Dust mitigation must include chemical suppressants (e.g.,	A water truck is available on-site for dust suppression. No dust fallout is evident due to the recent rainfall.

	Lignosulphonates) and soil stabilisers (e.g., straw) where required, especially in large open areas and the construction camp during dry or windy conditions.	
9.2	Roads, work areas, and the construction camp must be treated with dust suppression as needed to control dust fallout.	A water truck is available on-site for dust suppression. No dust fallout is evident due to the recent rainfall.
9.3	Concrete dust must be managed carefully; dust suppression using water is not permitted where concrete dust is present, and concrete bags must be secured to prevent cement dust from spreading.	No cement remains or dust fallout were observed during the site audit.
9.4	At the end of construction, the site camp must be rehabilitated by removing temporary surfaces, loosening the soil, and re-vegetating with locally indigenous species as per the landscape development plan.	Noted. Rehabilitation of the site camp will be monitored after construction within that section is complete.
10.	Noise	
10.1	Work hours must be limited to 07h00–18h00 on weekdays and Saturdays only; no work is permitted on Sundays. After-hours work requires prior consultation with the EO, residents, local industries, and written permission from the Noise Control Unit of Drakenstein Municipality.	Working hours have been kept by the construction team.
11.	Fires	
11.1	Fires may only be made within designated facilities in fenced contractor camps; no burning of waste is permitted. Wood or charcoal must be the only fuel sources, with no wood collection from private or public property allowed. Fires must be small-scale to prevent excessive smoke; heavy smoke emissions are prohibited.	No evidence of fires was observed during the site audit, except for the controlled burning of vineyards conducted under the obtained burning permit.
11.2	Adequate fire-fighting equipment must be available on-site at all times, and staff must receive fire safety training. The contractor must comply with SANS 10400 (2011) and the Community Fire	Adequate fire-fighting equipment is available on-site within the site camp, and staff are trained in fire safety.

	Safety By-Law (as amended), including fire hydrant requirements, access for emergency vehicles, and fire protection plans submitted by a competent fire engineer.	
12.	Erosion and Sedimentation	
12.1	Minimise disturbance on-site, especially by heavy vehicles; rehabilitate all eroded areas immediately with mulch or water diversion channels.	Only areas where the internal roads are being constructed are being cleared. No erosion was evident during the site audit.
12.2	Mulch all disturbed areas not landscaped during construction using alien-seed-free material.	Noted. No areas have been extensively cleared that require mulching as of yet.
12.3	Demarcate and cordon off rehabilitated areas to prevent access by vehicles or personnel.	Noted, civil services are still being installed. Once rehabilitation occurs, those areas will be cordoned off.
12.4	Cover all stockpiles with tarpaulins during strong wind or rain to prevent erosion.	Material stockpiles are continuously reused. Topsoil stockpiles have been revegetated with no erosion evident.
12.5	Install sediment control measures (e.g., traps, basins, silt fences) to prevent silt entering stormwater systems.	At the southern section of the site, a stormwater channel and culvert have collapsed. The contractor has excavated a new stormwater channel, which has been formalised. Recent rainfall has filled this excavated channel, and sandbags were placed to control water flow and prevent erosion.
13.	Fauna	
13.1	Prohibit intentional killing or poaching of animals; include this as a condition of employment.	No animals have been reported to be removed or harmed during construction.
13.2	Provide environmental training for staff on fauna handling procedures. Engage a specialist to safely relocate problem animals such as snakes.	Regular toolbox talks and induction are performed during construction.
14.	Heritage	
14.1	Cease all work immediately if archaeological artefacts are discovered; notify ECO and Local Council within 24 hours.	No heritage remains were exposed during excavations as per the ECO reports provided, thus far.

14.2	Ensure all heritage-related site and landscape plans for historical werf precincts are prepared by experienced architects and submitted to HWC for approval.	Noted.
14.3	Report any midden material found within 50m of the werf to HWC for assessment.	No heritage remains were exposed during excavations as per the ECO reports provided, thus far.
14.4	Adhere to heritage design parameters: building heights ≤ 1.5 storeys, visually permeable boundary treatments, simple building forms, compatible materials/colours, and preservation of the rural landscape character.	Noted.
15.	No-Go / Sensitive Areas	
15.1	Demarcate all topsoil stockpiles and no-go areas with danger tape/fencing before construction begins.	No demarcations of topsoil stockpiles are in place; note that a notice board can be erected surrounding the stockpiles.
15.2	Keep all construction activities strictly within the designated development footprint.	All construction activities are taking place within the designated development footprint.
15.3	Obtain specialist approval for type and placement of fencing/demarcation.	Along New Eskdale Street, the western Clearvu boundary wall is being installed
16.	Visual Impact	
16.1	Install shade cloth around contractor camps, laydown areas, and storage sites to reduce visual intrusion.	The site camp was screened with blue netting to help reduce the visual impact of the construction site and to keep the area tidy and contained.
16.2	Plant trees or natural screening around the site where practical to soften visual impacts.	Noted, this will be done at a later stage and monitored accordingly.
17.	Hydrology	
17.1	Construct berms, retention facilities, or other structures to manage runoff and reduce flow velocity.	At the southern section of the site, a stormwater channel and culvert have collapsed. The contractor has excavated a new stormwater channel, which has been formalised. Recent rainfall has filled this excavated channel, and sandbags were placed to

		control water flow and prevent erosion.
17.2	Allow stormwater to infiltrate naturally wherever possible.	The natural drainage line northwest of the Firwoods Homestead, which currently forms a wet area during rainfall, will be formalised with stormwater channels to improve water conveyance and prevent uncontrolled erosion. These channels will connect to the existing drainage infrastructure and stormwater ponds, ensuring that runoff is contained and managed according to the site's stormwater management plan.
17.3	Prevent polluted water, silt, or wastewater from entering stormwater systems, surrounding land, or streets.	No pollution was observed during the site audit.
17.4	Install sediment traps in locations that do not increase flood risks.	Noted. No silt traps have been needed thus far.
18.	Soil	
18.1	Strip topsoil to 300 mm depth before construction and stockpile in demarcated areas ≤2 m high.	Topsoil has been stripped and revegetated. Topsoil stockpiles have been placed separately, not higher than 2m, but demarcation is required.
18.2	Do not use topsoil contaminated with alien seed for rehabilitation unless an eradication programme is approved by the ECO.	Noted. Alien clearing will occur prior to rehabilitation and backfilling.
18.3	Apply dust suppression for stockpiles older than one month using water or biodegradable chemical binding agents.	A water truck is available on-site for dust suppression. No dust fallout is evident due to the recent rainfall.
18.4	Backfill and contour disturbed areas to blend with the natural surroundings.	Noted, civil services area is still being installed, and backfilling will commence once all pipeline materials have been installed.
19.	Services Installation	
19.1	Install water and sewer services as part of road construction to avoid duplication of disturbance.	Compliant, water, stormwater and sewer installations have commenced along with the establishment of the internal road network.
19.2	Divert runoff away from trench lines using sandbags or temporary banks.	No construction runoff was noted. A large and smaller stormwater pond is being utilised for precipitation runoff as well as the

		installation of the sandbag within the excavated stormwater channel towards the southwest.
19.3	Compact backfill properly and rehabilitate road surfaces promptly.	Noted. Trenches are still to be backfilled upon installation, and road areas are being chipped and strayed.
19.4	Store bedding and backfill material away from drainage paths and protect stockpile toes with silt barriers.	Stockpiles have been placed outside the natural drainage paths; no sedimentation or erosion was observed during the site audit.

EMPr Compliance Rating	98.47%
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CONCLUSION

In conclusion, Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) was appointed in August 2025 by Bello Campo (Pty) Ltd., represented by H. Campbell (the Applicant), as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 17 of the Environmental Authorisation (EA) and Regulation 34 of the NEMA EIA Regulations, 2014 (as amended).

The EA was initially granted to Bello Campo (Pty) Ltd. on 2 December 2022, in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2014 (as amended), under DEA&DP reference 16/3/3/1/B3/28/1032/22. The EA has since undergone a Part 1 amendment to incorporate changes to the approved layout, resulting in a less dense development with fewer residential units due to shifts in market demand. Furthermore, the amendment includes adjustments to the floodline cut and fill, as the Western Cape Government: Department of Agriculture required the area to remain actively farmed, and the previously approved pond system's location would have hindered successful agricultural activities.

The external environmental audit conducted on 19 August 2025 confirms that the Applicant is compliant with the conditions of the EA and the Environmental Management Programme (EMPr). The EMPr has proven effective in guiding and mitigating the environmental impacts associated with the construction activities undertaken to date.

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 'Renier Kapp', written over a light blue grid background.

Renier Kapp
for KAPPEC

ANNEXURE A – SITE PHOTOGRAPHS



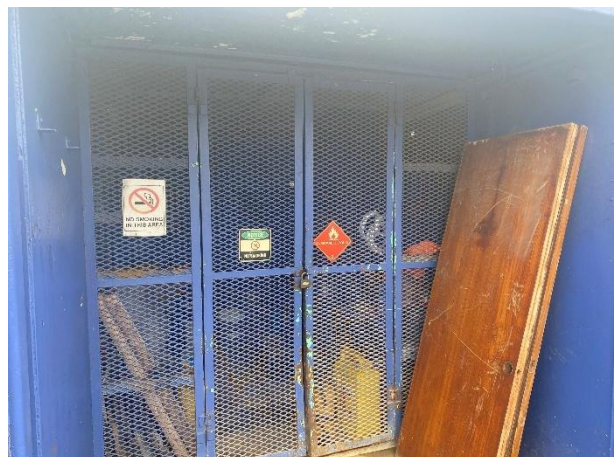
Site camp area with storage trailer, construction materials, and temporary shelter structure.



Construction waste stored in a trailer at the site camp, secured in plastic sheeting to prevent windblown litter.



Concrete cutting saw stored at the site camp.



Lockable storage containers located within the site camp with appropriate warning signage.



Asphalt paver located within the site camp.



Toilets in place adjacent to the site camp.



Toilets in place adjacent to the site camp. Vegetation debris surrounding the area.



Workers' homesteads to be demolished and crushed; Firwoods Homestead to be retained.



Workers' homesteads to be demolished and crushed; Firwoods Homestead to be retained.



Existing Firwoods Homestead to be retained.



Access road off New Eskdale Street chipped and sprayed.



Vineyards cleared due to unproductive vines.



Stormwater pipeline material adjacent to the road being chipped and sprayed west of the Firwoods Homestead.



Topsoil stockpiles towards the southwest.



Towards the west, internal roads are being chipped and sprayed with material placed along the development.



Towards the west, internal roads are being chipped and sprayed with material placed along the development.



Road surfaces being prepared for asphalt.



Road surfaces being prepared for asphalt



1.1m stormwater pipeline material adjacent to the large stormwater pond to be installed.



Large stormwater pond located east of the existing Firwoods Homestead.



Condition of the large stormwater pond located east of the existing Firwoods Homestead.



Condition of the large stormwater pond located east of the existing Firwoods Homestead.



Stormwater pipeline installed in the large pond to direct water toward the main outlet along the Berg River.



Demolished buildings crushed on-site for reuse as G7 material in road construction.



Stormwater pipeline installed in the large pond to direct water toward the main outlet along the Berg River.



Vineyards cleared due to unproductive vines.



Vineyards to be cleared due to unproductive vines.



View of the site towards the site camp looking northwest.



Cleared vines have been placed adjacent to the Homestead and stormwater pond.



Cleared area adjacent to the Homestead and stormwater pond wet due to the recent rain.



Topsoil stockpiles southwest of the large stormwater pond.



View of the existing Firwoods Homestead and stockpile laydown area towards the southwest.



Cleared area towards the east designated for agriculture along the Berg River.



Cleared area towards the east designated for agriculture along the Berg River.



Cleared area towards the west where vineyards have been cleared.



Cleared area towards the east designated for agriculture along the Berg River.



Smaller stormwater pond towards the north.



Smaller stormwater pond towards the north.



Excavated stormwater outlet channel north towards the Berg River.



Excavated stormwater outlet channel north towards the Berg River.



Excavated stormwater outlet channel north towards the Berg River.



Condition of the Berg Riverbank north of the development site.



Dumped base material after the construction of the mall west of the development site, creating a quarry.



Dumped base material after the construction of the mall west of the development site, being reused.



Workers' house still to be demolished and crushed.



Cleared eastern area where unproductive vineyards were removed, to be reinstated with new vines.



Civil service installations adjacent to the site camp.



Stockpile material adjacent to the site camp towards the southwest.



Chemical Toilet in place within the site camp.



Bin and wire structure available within the site camp for waste disposal.



Wire structure available within the site camp for waste disposal.



Civil services, kerbs, and road surface being prepared west of the site camp at the entrance to the site.



Civil services, kerbs, and road surface being prepared west of the site camp at the entrance to the site.



Civil services, kerbs, and road surface being prepared west of the site camp at the entrance to the site.



Internal road network being cut, shaped, and prepared.



Revegetated topsoil stockpiles adjacent to the site camp.



Water truck available for dust fallout on site.



Asphalt material stockpiles adjacent to the site camp where roads are being chipped and sprayed.



Topsoil and material stockpiles separated adjacent to the site camp.



Asphalt mixing with a mortar board in place.



Civil services, kerbs, and road surface being prepared west of the site camp at the entrance to the site.



Condition of New Eskdale Street towards the southwest where the ClearVu boundary fence is being installed.



Condition of New Eskdale Street towards the southwest, where the ClearVu boundary fence is being installed.



Firwoods Homestead Beacon along New Eskdale Street.



Internal road surfaces being chipped and sprayed. Entrance to the site towards the Firwoods Homestead.



Fibre installations along New Eskdale Street.



Condition of New Eskdale Street towards the North.



Condition of New Eskdale Street towards the North. Civil services being installed along the road.



Cleared southern area where unproductive vineyards were removed, to be reinstated with new vines.



Stockpile area towards the southwest where roads are being excavated.



Topsoil stockpiles towards the southwest, adjacent to the foreman's house.



Roads being chipped and sprayed south of the foreman's house.



Ready mix cement for kerb installations.



Roads being chipped and sprayed south of the foreman's house.



Roads being excavated and cut south of the foreman's house.



Stockpile area southwest of the site. Topsoil stockpiles have been revegetated.



Roads being excavated and cut south of the foreman's house.



Stockpile area southwest of the site. Topsoil stockpiles have been revegetated.



Excavated stormwater channel towards the southwest.



Collapsed stormwater channel with a new, formalised channel under construction.



Collapsed culvert to be upgraded.



Recent rain filled the excavated stormwater channel; sandbags were placed to control flow.



Stormwater channel being upgraded towards the southwest.



Stormwater channel being upgraded towards the southwest.



Fibre being installed along New Eskdale Street.

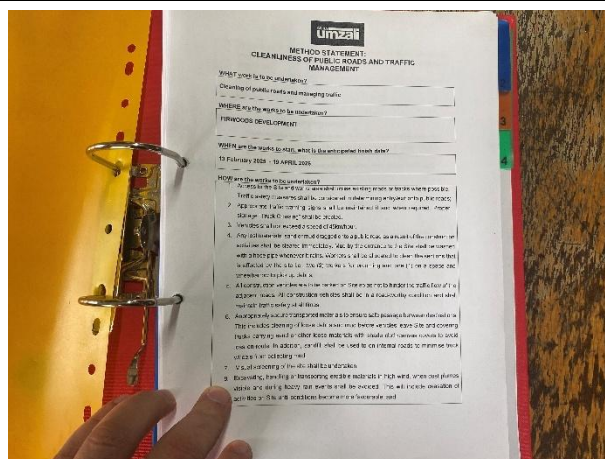


ClearVu boundary fence being installed along the western boundary of the site.

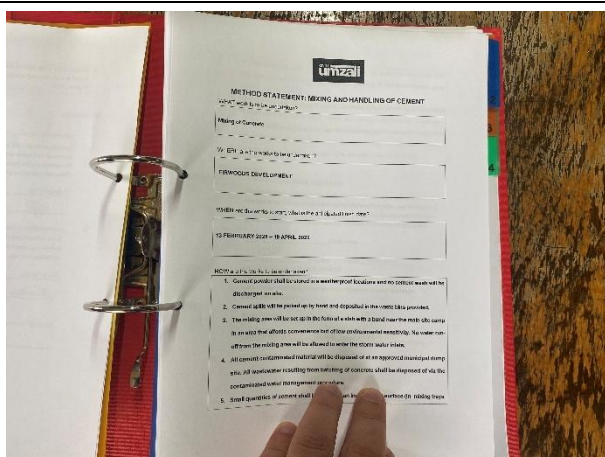
Environmental File



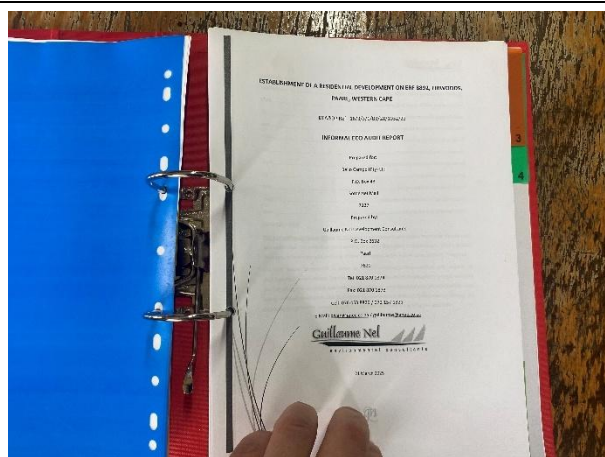
Environmental file available at the site office.



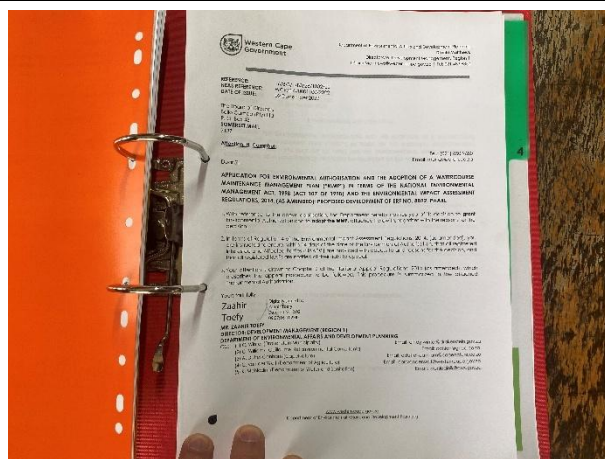
Method Statement for Traffic Management.



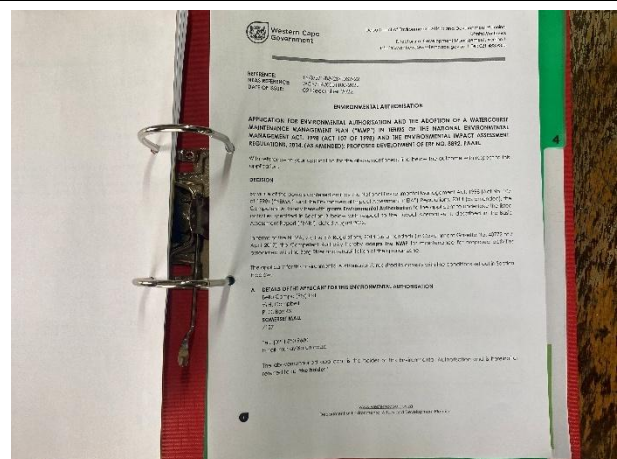
Method Statement for Cement Handling.



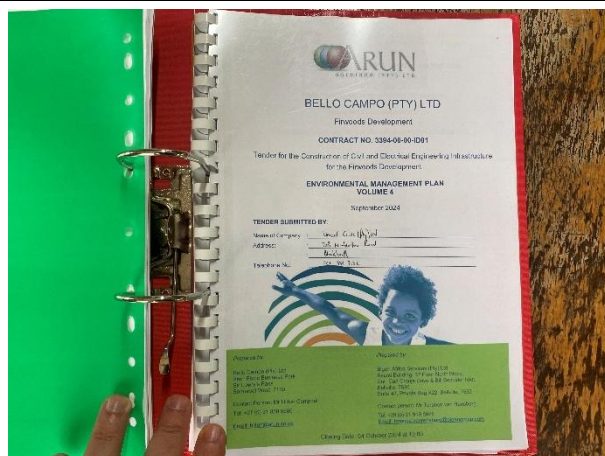
ECO reports submitted.



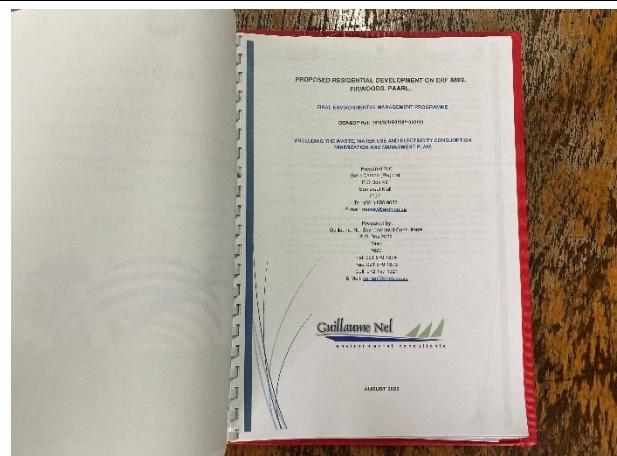
Notification of the 2022 Environmental Authorisation.



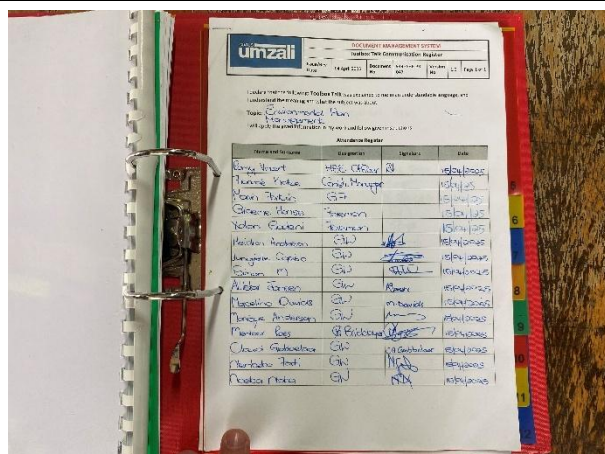
2022 Environmental Authorisation.



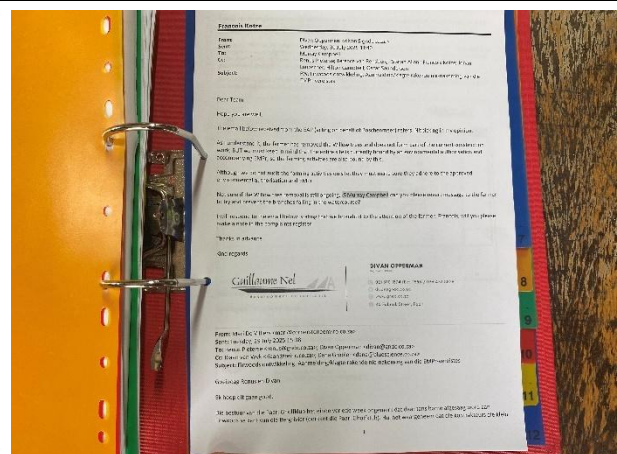
EMP included in contract documents.



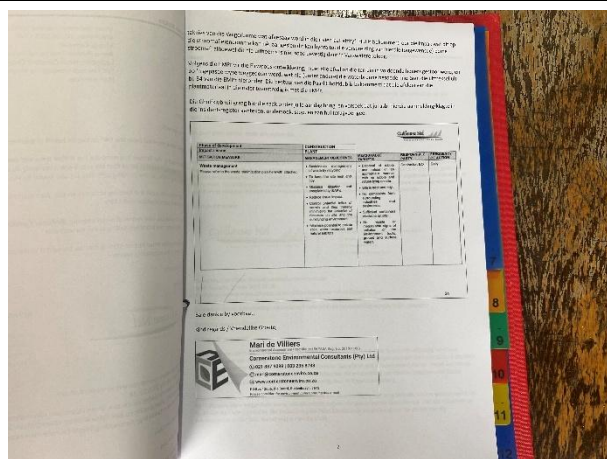
Environmental Management Programme.



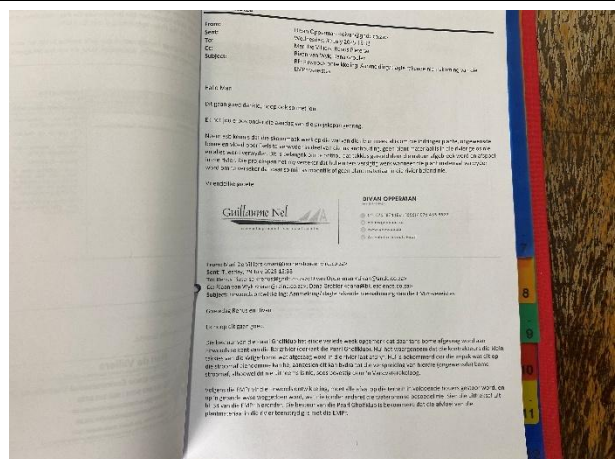
Environmental induction register.



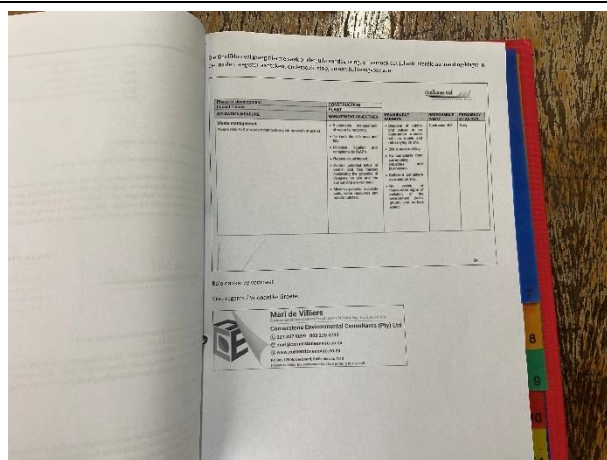
Project team and farmer have been made aware of the communication received from the Golfklub.



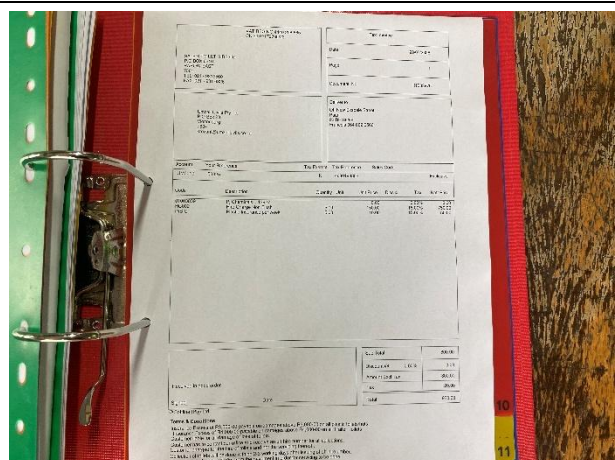
Correspondence from the Golfklub regarding waste removal.



Correspondence from the EAP and contractor regarding the raised concern.



Correspondence from the EAP and contractor regarding the raised concern.



Chemical toilet hire invoice.