

**THE PROPOSED KRAAIBOSCH PARK
RESIDENTIAL DEVELOPMENT ON ERVEN 28368,
29144, 29246 AND 27668 (PREVIOUSLY PORTION
370), AND PORTION 371 OF THE FARM
KRAAIBOSCH NO. 195, GEORGE.**

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

EIA Ref: 16/3/3/1/D2/19/0028/24
NEAS Ref: WCP/EIA/0001513/2024



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KAPPEC

24 April 2026

DETAILS OF THIS REPORT

Status of this Report	Regulation 34 External Compliance Audit Report
Date Submitted	April 24, 2026
Public Review Period	Not Applicable
Report Title	The Proposed Kraaibosch Park Residential Development on Erven 28368, 29144, 29246, and 27668 (Previously Portion 370), and Portion 371 of The Farm Kraaibosch No. 195, George.
Applicant	The Managing Director Cape Estates Properties Outeniqua (Pty) Ltd Garden Route Mall P.O. Box 12486 George 6546 Mr. Fred de Kock Tel: 044 887 0455 E-mail: fred@capeestates.co.za
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DISCLAIMER

This report has been prepared for Mr. Fred de Kock, Managing Director of Cape Estates Properties Outeniqua (Pty) Ltd 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.

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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

24 April 2026

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
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INTRODUCTION

Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated April 2026, by Mr. Fred de Kock (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 18 of the Amended Environmental Authorisation of 19 March 2025 (Ref: 16/3/3/1/D2/19/0028/24).

An Environmental Authorisation (EA) was initially issued on 4 November 2010 (DEA&DP Ref: EG12/2/1-AG3-5720) for the proposed change in land use from agricultural to alternative land use for the development of a residential township. Subsequently, an amendment to the EA was approved on 14 December 2022 for a change in ownership as well as an update to the project description. A second amendment application was thereafter approved on 19 March 2025 (Ref: 16/3/3/1/D2/19/0028/24). This amendment provided for revisions to the development layout, including an increase in residential density, the incorporation of delineated wetlands into the development, and the inclusion of associated stormwater management infrastructure.

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 Kraaibosch Park Residential Estate entails the development of a multi-phased residential estate and associated infrastructure on Erven 28368, 29144, 29246 and 27668 (previously Portion 370), as well as Portion 371 of the Farm Kraaibosch No. 195, located in George.

The development is structured across several phases and includes a mix of residential typologies and supporting facilities. Phase 1 comprises 40 residential erven. Phase 2 includes 94 residential housing erven and one General Residential Erf accommodating 10 apartments, as well as the consolidation of Erven 29177, 29178, 29199 and a portion of an internal road to provide for a frail care and assisted living facility. Phase 3 consists of 26 retirement resort erven and 28 group housing erven. Phase 4 provides for 74 group housing erven at a density of approximately 14.8 units per hectare, together with a retirement resort comprising a frail care facility with 68 beds and an assisted living complex consisting of 40 two-bedroom units.

Phase 5 allows for a future development of 75 units at a density of 30 units per hectare, while Phase 6 provides for a further 44 units at the same density, in addition to approximately 3 hectares of private open space. A further future development component includes 104 units at a density of 30 units per hectare. The development also includes internal access roads of up to 5.5 metres in width and associated stormwater management infrastructure.

Supporting services infrastructure will be developed as part of the project, including stormwater management systems implemented in accordance with the approved Stormwater Management Plan (Drawing No: G5155BD-CE-202 (Rev. E), dated 7 December 2023). The layout of the development is guided by the Site Development Plan (Plan No: Pr22/37 GEO27668Ph4Layout07), dated 31 July 2024.

The site is located north of the existing Kraaibosch Manor Residential Estate and to the east of the Springfield Residential Estate on Portion 53 of the Farm Kraaibosch No. 195. The development falls within the urban edge of George.

The proposed development responds to changing market demands for housing and aligns with the strategic planning objectives of the George Municipality, which promotes increased residential density within the urban edge to limit urban sprawl and improve land use efficiency.

APPROVED LISTED ACTIVITIES

Activity No(s):	Provide the relevant Activities as set out in Listing Notice 1	Describe the portion of the development to which the applicable listed activity relates.
Activity 9	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.	<i>The proposed stormwater management plan requires the installation of stormwater pipes with an internal diameter exceeding 0.36m and longer than 1 000m in length.</i>
Activity 10	The development and related operation of infrastructure exceeding 1 000 metres in length for the bulk transportation of sewage, effluent, process water, waste water, 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.	<i>According to the applicant the sewage pipelines is within the flow threshold of the listed activities.</i>
Activity 12	The development of— (i) dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or (ii) infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback exists, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding— (aa) the development of infrastructure or structures	<i>The installation of services, construction of roads and the implementation of the stormwater management plan will require the construction of infrastructure within a watercourse as delineated by the aquatic specialist and within 32m of the delineated watercourse. The cumulative extent of the infrastructure exceeds 100m².</i>

	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.	
Activity 19	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.	<i>According to the applicant, the implementation of the stormwater management plan will require the moving of soil within a watercourse delineated by the aquatic specialist.</i>
Activity 27	The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	<i>The proposed development (densification area) will require the clearance of approximately 19ha of indigenous vegetation as defined in the EIA Regulations, 2014. The clearance will be undertaken within the previously authorised development area.</i>
Activity 28	Residential, mixed, retail, commercial, industrial or institutional agriculture, game farming, equestrian purposes or developments where such land was used for afforestation on or after 01 April 1998 and where such	<i>The property was used for agricultural activities on or after 1 April 1998 and is regarded to fall outside the urban area. Furthermore, the proposed development (densification area) exceeds 1ha in extent.</i>

	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.	
Activity No(s):	Provide the relevant Activities as set out in Listing Notice 3	Describe the portion of the development to which the applicable listed activity relates.
Activity 4	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.	<i>The proposed development includes the development of internal roads up to 5.5m with road reserve varying between 12m and 18m. The area earmarked for the proposed roads currently consists of indigenous vegetation as defined in the EIA Regulations, 2014.</i>
Activity 12	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,	<i>The proposed development (densification area) will require the clearance of more than 300m² of indigenous vegetation of indigenous vegetation as defined in the EIA Regulations, 2014, within a Critically Endangered ecosystem (i.e. garden Route Granite Fynbos) and within an area mapped as Critical Biodiversity Area. Furthermore, clearance of indigenous vegetation is also proposed in areas zoned or deemed to be zoned as open space or equivalent zoning.</i>

	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.	
Activity 14	The development of— (i) dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10 square metres; or (ii) infrastructure or structures with a physical footprint of 10 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 has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour. i. Western Cape (i) Outside urban areas: (aa) A protected area identified in terms of NEMPAA, excluding conservancies; (bb) National Protected Area Expansion Strategy Focus areas; (cc) World Heritage Sites; (dd) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act and as adopted by the competent authority; (ee) Sites or areas listed in terms of an international convention; (ff) Critical biodiversity areas or ecosystem service areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans; (gg) Core areas in biosphere reserves; or (hh) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined.	<i>The proposed development includes that development of stormwater structures and infrastructure within the watercourse and within 32m of the edge of the watercourse in an area mapped as Critical Biodiversity Area. The cumulative development footprint exceeds 10m².</i>

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

18. 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:

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

18.1.1. During the period which the activities have been commenced with on site, the Holder must ensure annual Environmental Audit Report(s) are undertaken and submitted to the Competent Authority within 30-days of either—

- (a) the environmental audit being completed, or
- (b) the findings and recommendations of the environmental audit report, which had been subjected to a public participation process agreed to with the competent authority, has been completed.

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

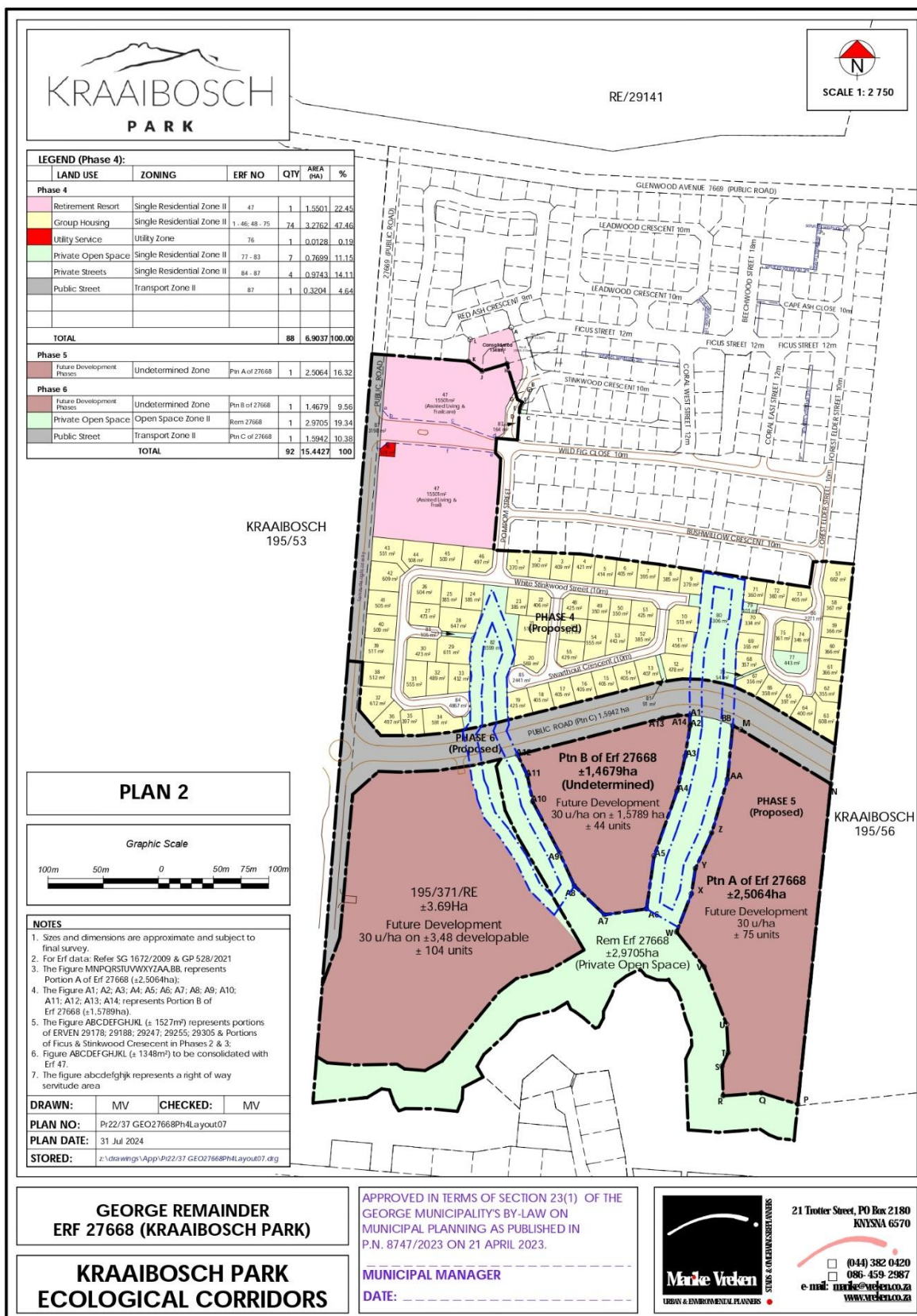


FIGURE 1: SITE DEVELOPMENT PLAN

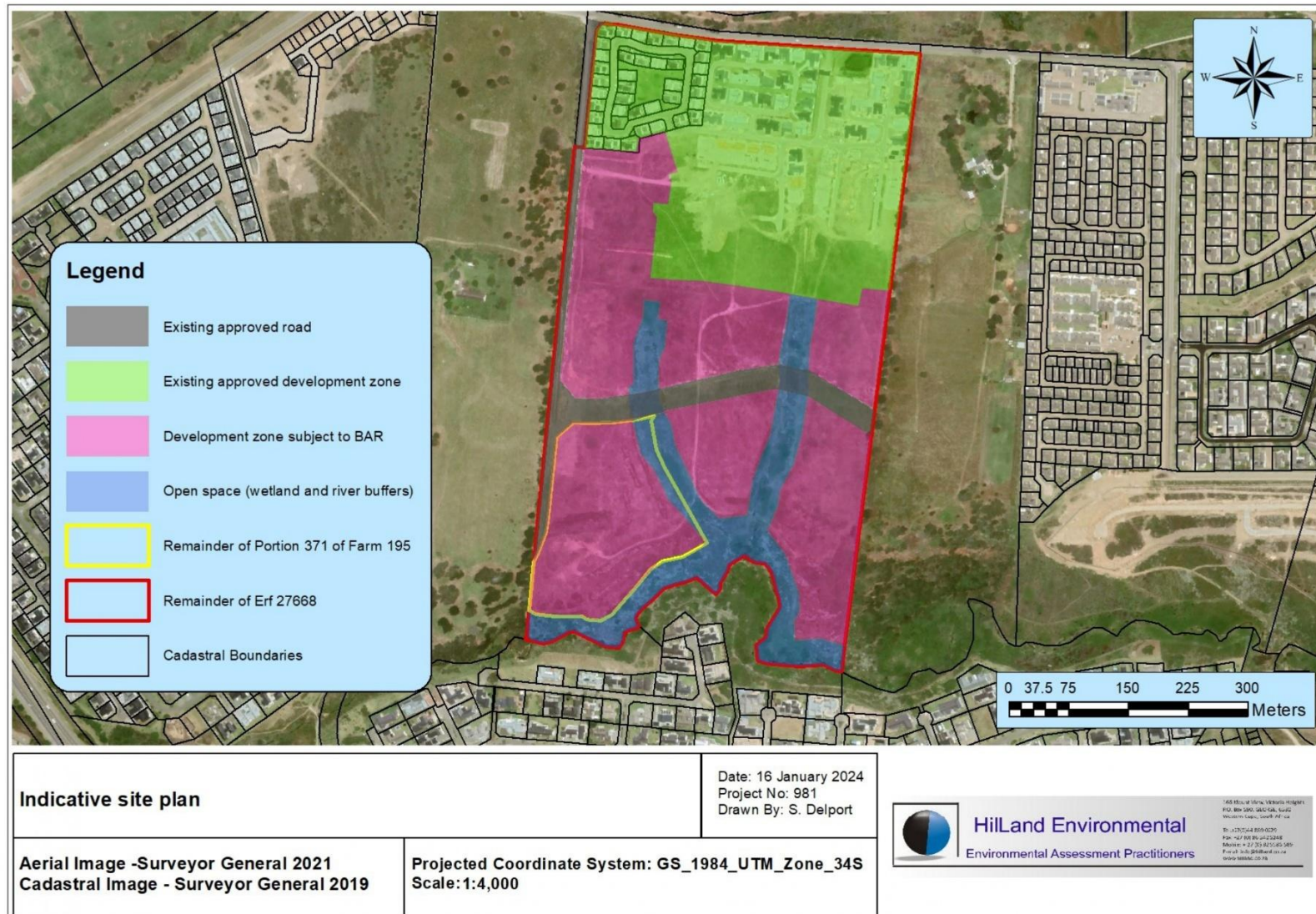


FIGURE 2: SITE PLAN

CONDITIONS OF AUTHORISATION

TABLE 2: ENVIRONMENTAL AUTHORISATION GENERAL CONDITIONS AND COMPLIANCE

No.	EA CONDITIONS	COMPLIANCE FINDING
1.	This Environmental Authorisation is granted for the period from date of issue until 20 March 2035 (validity period), during which period the Holder must ensure that the— (a) physical implementation of all the authorised listed activities is started with and concluded; (b) construction monitoring and reporting requirements are undertaken and submitted to the Competent Authority in time to allow said authority to process such documents timeously; (c) post construction rehabilitation and monitoring requirements is undertaken and completed; and	The original Environmental Authorisation (EA) was granted on 4 November 2010 (Ref: EG12/2/1-AG3-5720). Subsequent amendments were approved on 14 December 2022 and 19 March 2025 (Ref: 16/3/3/1/D2/19/0028/24), with the latter replacing the previous Environmental Authorisation. Notification of continuation of commencement was submitted to the Department of Environmental Affairs and Development Planning (DEA&DP) on 4 August 2025, with an updated EMPr submitted on 8 April 2025. HilLand Environmental has been appointed as the Environmental Control Officer (ECO) for the project and has been undertaking regular site monitoring since July 2024, including monthly compliance monitoring for Phases 1 to 3 (OEMPr and Construction EMPr). Civil services installation for Phases 1 to 3 has been completed, with housing construction currently underway. Monitoring for Phase 4 commenced in April 2025, including civil works for Phase 4A, and environmental induction for new contractors was conducted on 16 April 2025. Noted. This will be audited during the final completion audit.

	(d) environmental auditing requirements are complied with; and that such auditing is finalised in time to allow the competent authority to be able to process the environmental audits timeously within the specified validity period. Failing which, this Environmental Authorisation shall lapse, unless the environmental authorisation is amended in accordance with the relevant process contemplated in the Environmental Impact Assessment Regulations promulgated under the National Environmental Management Act, 1998 (Act no. 107 of 1998).	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) was appointed in April 2026 by Mr. Fred de Kock (the Applicant) as the independent environmental practitioner to undertake an external compliance audit in fulfilment of Condition 18 of the amended Environmental Authorisation dated 19 March 2025 (Ref: 16/3/3/1/D2/19/0028/24), in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) and the EIA Regulations, 2014 (as amended).
2.	The Holder is authorised to undertake the listed activities specified in Section B above in respect of the preferred alternative described in the FBAR, dated 31 October 2024, on the site as described in Section D above. This Environmental Authorisation is for the implementation of the preferred alternative which entails: The Kraaibosch Park Residential Estate entails the development of a residential estate and associated structures and infrastructure on the Erven 28368, 29144, 29246 and 27668 (previously Portion 370), and Portion 371 of the Farm Kraaibosch No. 195 in George, consisting of: Phase 1: 40 x residential erven; Phase 2: 94 x residential housing erven and 1 x General Residential Erf (10 apartments) Consolidation of erven 29177, 29178, 29199 and a portion of the internal road for frail care and assisted living; Phase 3: 26 x retirement resort erven and 28 x group housing erven; Phase 4: 74 x group housing erven at a density of 14.8 units/ha, and 1 x retirement resort consisting of a frail care facility (68 beds) and	Noted. All listed activities and the preferred alternative as outlined in the Amended EA are being implemented accordingly.

	assisted living complex (40 x 2-bedroom units); Phase 5: 1 x future development (75 units) at a density of 30 units/ha; Phase 6: 1 x future development (44 units) at a density of 30 units/ha and private open space of approximately 3ha; Future development (104 units) at a density of 30 units/ha; Internal roads up to 5.5m wide; and Stormwater runoff management infrastructure. The proposed development also includes the development of associated services structures and infrastructure. Stormwater management infrastructure will be developed and implemented in accordance with the Stormwater Management Plan (Drawing No: G5155BD-CE-202 (Rev. E), Date: 7 December 2023). The proposed development will be implemented approximate to the Site Development Plan (Plan No: Pr22/37 GEO27668Ph4Layout07) dated 31 July 2024, attached as Appendix B1 of the BAR. Copies of the Stormwater Management Plan and Site Development Plan has been attached to this environmental authorisation as Annexure 2A and 2B respectively.	
3.	This Environmental Authorisation may only be implemented in accordance with the approved Environmental Management Programme ("EMPr").	Noted, the approved Amended EMPr (Ref.: GEO25/981/100) is being implemented.
4.	The holder shall be responsible for ensuring compliance with the conditions by any person acting on his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the holder.	Noted. The holder 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.
5.	Any changes to, or deviations from the scope of the alternative described in section B above must be accepted or approved, in writing, by the Competent Authority before such changes or	Noted. No changes or deviations from the scope of the project description have occurred since the final 19 March 2025 amended Environmental Authorisation (EA) was issued.

	deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the Holder to apply for further authorisation in terms of the applicable legislation.	
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 decision reached on 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 Appeal 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; 6.4. provide the registered I&APs with the: 6.4.1. 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, 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	The I&APs were notified of the amended EA on the 19th of March 2025. On the same day the amended EA was granted.

	2014 National Appeals Regulations (as amended). 6.5. The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the holder notifies the registered I&APs of this decision. 6.6. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided <i>i.e.</i>, the listed activities, including site preparation, must not commence until the appeal is decided.	No appeals were lodged against the New EA.
7.	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of any activities pertaining to phases 4 – 6 on site. 7.1. The notice must make clear reference to the site details and EIA Reference number given above. 7.2. The notice must also include proof of compliance with the following conditions described herein: Condition no.: 6 and 14	DEA&DP was notified of the intended continued commencement of work on August 4, 2025, and made clear reference to the site details, EIA Reference, and proof of compliance as referred to below: Condition 6: <i>The I&APs were notified of the amended EA on the 19th of March 2025.</i> Condition 15: <i>HillLand Environmental have been appointed as the ECO for the project.</i>
8.	Seven calendar days' notice, in writing, must be given to the Competent Authority on completion of the construction activities.	Noted. Construction is still ongoing.
9.	The Holder must notify the competent authority if the non-operational phase (construction activities and rehabilitation measures) has been abandoned prior to completion thereof, or if the construction activities and rehabilitation process will be placed on hold for a period of six (6) months or longer. Further to the above, the Holder must notify the competent authority in writing within— 9.1. 30-calendar days of the cessation of the activities on site; and 9.2. seven (7) calendar days prior to any activities physically continuing on the site again.	Noted. Construction is still ongoing.

10.	The Environmental Management Programme (“EMPr”) submitted as part of the application for Environmental Authorisation is herewith approved .	Noted.
11.	The requirements for the avoidance, management, mitigation, monitoring and reporting of the impacts of the activity on the environment, which have been identified in this Environmental Authorisation additional to those contained in the approved EMPr, must be implemented together with the EMPr.	Noted.
12.	The EMPr must be updated to incorporate all the conditions contained in this Environmental Authorisation and all those measures for the avoidance, management, mitigation, monitoring and reporting as identified in this Environmental Authorisation additional to those contained in the approved EMPr. The updated EMPr must be re-submitted to the Competent Authority prior to commencement of the construction activities for phases 4 – 6, together with the appended Conservation Management Plan.	The updated EMPr was submitted to DEADP on 8 April 2025 and approved with the New EA.
13.	The approved EMPr (including the additional measures for the avoidance, management, mitigation, monitoring and reporting identified in the Environmental Authorisation) must be included in all contract documentation for all phases of implementation.	According to the ECO reports, the EMPr was issued to the contractor.
14.	The Holder must appoint a suitably experienced environmental control officer (“ECO”), for the duration of the construction and rehabilitation phases of implementation contained herein.	HilLand Environmental has been appointed as the Environmental Control Officer (ECO) to conduct audits on environmental compliance and will subsequently submit a monthly report to your Department.

15.	The ECO must– 15.1. be appointed prior to commencement of any works (<i>i.e.</i>, demarcation of the remaining natural area, relocation of bulbs; and disturbance, cutting and / or damage to protected trees); 15.2. ensure compliance with the EMPr and the conditions contained herein; 15.3. keep record of all activities on the site; problems identified; transgressions noted, and a task schedule of tasks undertaken by the ECO; 15.4. remain employed until all development activities are concluded, and the post construction rehabilitation and monitoring requirements are finalised.	Noted. HilLand Environmental conducts monthly site visits and subsequently submits monthly audit/monitoring reports to DEA&DP.
16.	A copy of the Environmental Authorisation, EMPr, any independent assessments of financial provision for rehabilitation and environmental liability, closure plans, audit reports and compliance monitoring reports must be kept at the site of the authorised activities and be made available to anyone on request, and where the Holder has website, such documents must be made available on such publicly accessible website.	A digital Environmental File is available and includes all the necessary documentation.
17.	Access to the site (referred to in Section D) 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 Glenwood Avenue.
18.	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: 18.1. Auditing during the non-operational phase (construction	

activities): 18.1.1. During the period which the activities have been commenced with on site, the Holder must ensure annual Environmental Audit Report(s) are undertaken and submitted to the Competent Authority within 30-days of either— (a) the environmental audit being completed, or (b) the findings and recommendations of the environmental audit report, which had been subjected to a public participation process agreed to with the competent authority, has been completed. 18.1.2. A final Environmental Audit Report for the construction phase (non-operational component) must be submitted to the Competent Authority within three (3) months of completion of the post construction rehabilitation and monitoring requirements. Note: Failure to complete the auditing requirements at least three months prior to expiry of the validity period of the environmental authorisation may result in the Holder not being able to comply with all the environmental auditing and reporting requirements.	Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) has been appointed, dated April 2026, by Mr. Fred de Kock (the Applicant) as the independent environmental practitioners to undertake an external compliance audit in fulfilment of Condition 18 of the Amended Environmental Authorisation of 19 March 2025 (Ref: 16/3/3/1/D2/19/0028/24), in terms of the National Environmental Management Act, 1998 (Act 107 Of 1998) and the Environmental Impact Assessment Regulations, 2014.
19. The Environmental Audit Report, must – 19.1. be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise. Such person may not be the ECO or EAP who conducted the EIA process; 19.2. provide verifiable findings, in a structured and systematic manner, on– 19.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is	Noted. This audit report includes all relevant information regarding the compliance performance of the contractor and other involved parties during the construction phase.

	sufficient or not; and 19.2.2. 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. 19.3. identify and assess any new impacts and risks as a result of undertaking the activity; 19.4. evaluate the effectiveness of the EMPr; 19.5. identify shortcomings in the EMPr; 19.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 19.7. 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; 19.8. indicate the date on which the operational phase was commenced with and the progress of the rehabilitation; 19.9. include a photographic record of the site applicable to the audit; and 19.10. be informed by the ECO reports.	The continuation of Phase 4 commenced in April 2025. The operational phase of Phase 1, 2 and 3 commenced prior April 2025. As per the March 2025 ECO report: <i>Note that as of April 2025, compliance monitoring will be done in accordance with the new EMPr as approved by DEADP on 19 March 2025.</i>
20.	The Holder must, within 7 calendar days of the submission of the audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to	Noted.

	anyone on request and on a publicly accessible website (if applicable).	
21.	The area immediately south of the development abutting the Modderrug River must be managed as an open space area and must not be developed. Further to the above— 21.2.1 No new buildings, bulk engineering services infrastructure, structures or infrastructure (including the stormwater management infrastructure proposed as part of the stormwater management plan e.g. swales) may be constructed / installed in this open space area within 30 metres from the edge Modderrug River, unless the necessary authorisation has been obtained. 21.2.2 A public walkway system must be established in the open space system, away from the riverbank to prevent erosion. The walkways must be able to accommodate wheelchairs, pedestrians and cyclists and be at least 2.0m in width, and must connect with the public walkway system on adjacent properties. 21.2.3 No fencing may cross the river, and the fencing must be restricted to the residential area. 21.2.4 The Holder must ensure that all alien invasive plant species will be removed from the open space area within the specified validity period. 21.2.5 A “Conservation Management Plan” (CMP) must be developed and implemented for the management of the Modderrug	The area immediately south of the development, abutting the Modderrug River, is currently being maintained as an open space area, with no evidence of formal development or infrastructure encroachment within the 30 m buffer. Construction activities remain confined to the approved development footprint, and no buildings, bulk services, or stormwater infrastructure have been installed within this restricted zone without authorisation. At the time of the audit, no formal public walkway system accommodating pedestrians, cyclists, and wheelchair users was observed within the open space area. This is likely to form part of a later phase of development and will need to be implemented in accordance with the approved specifications, ensuring appropriate setback from the riverbank to prevent erosion and connectivity with adjacent properties. No fencing crossing the river was observed, and fencing appears to be limited to the residential development areas as required. The open space area remains largely intact, with ongoing alien invasive vegetation clearing noted as part of site management practices. A Conservation Management Plan (CMP) for the Modderrug River open space area was not specifically referenced in the

	River open space with a conservation outcome during the validity period of this Environmental Authorisation. Such CMP must address and / or incorporate the following— (a) No planting except for rehabilitation in terms of an approved management plan. (b) The corridor must remain linked to form a green belt with adjacent properties with open space areas. (c) No collection or damaging of fauna and flora, and (d) Financial provisions for the management and upkeep of the conservation area. Note: The CMP should be incorporated in the constitution of estate's Homeowners Association (HOA), and must be appended to the EMPr.	audit documentation and should be confirmed.
22.	The Stormwater Management Plan (Drawing No: G5155BD-CE-202 (Rev. E), Date: 7 December 2023) drafted by Kantey and Templer Consulting Engineers must be implemented.	Noted. The SWMP is being implemented where necessary.
23.	Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains may only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant Heritage Resources Authority. Heritage remains include: meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils);	No heritage remains were exposed during excavations as per the ECO reports provided, thus far.

	coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; shipwrecks; and/or graves or unmarked human burials including grave goods and/or associated burial material.	
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EA Compliance Rating	100%
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SITE AUDIT FINDINGS

An external environmental audit and site walkthrough for the Kraaibosch Park Residential Estate were conducted on 10 April 2026 by the appointed independent auditor, accompanied by the Environmental Control Officer (ECO).

At the time of the audit, the development continued to progress in accordance with the approved phased approach. Civil services installation for Phases 1, 2, 3, 4A and 4B has been completed, with associated bulk earthworks and infrastructure. Housing construction is actively underway within Phases 3 and 4, with several erven under development. It was noted that cement batching is taking place on plastic sheeting at one location of Phase 3, and the use of mortarboards or mixing on foundations is preferred to prevent spills and/or runoff. Landscaping is being implemented progressively upon completion of residential units.

Phase 4 remains the primary focus of current development activity, including group housing and components of the retirement and frail care facilities. The main access road adjacent to this development area is also under construction. Working areas are generally well demarcated, and construction activities are largely confined to approved footprints. Topsoil and subsoil stockpiles were observed within Phases 4A and 4B, with adequate separation maintained between stockpile types.

Stormwater management infrastructure has been implemented in accordance with the approved design, including the installation of outlets with energy dissipators (reno mattresses) within the wetland buffer. While these structures are functioning as intended, ongoing monitoring for erosion is required. The southern stormwater swale within Phase 5, forming part of the Sustainable Drainage System (SuDS), is under construction, with shaping undertaken using rescued topsoil. The placement of these structures remains within the approved staked areas. Sewer manholes have been installed along its alignment.

Notwithstanding the generally good level of compliance, several site-specific issues were identified. The temporary placement of spoil material within sections of the staked wetland buffer area must be avoided, and spoil within buffer zones must be removed and ripped. Construction of individual site fencing along the wetland buffer is currently being installed to improve protection; no gaps in demarcation should occur. An incident was noted in Phase 4B, whereby paint residue was noted in the stormwater outlet within the buffer area. The contractors must be reminded that this is not permissible.

Topsoil management practices are generally appropriate, with stockpiling observed within open erven in Phase 3 and within designated areas in Phases 4A and 4B. Care must be taken to ensure that stockpiles remain outside of sensitive areas and do not encroach into buffer zones. Along the northwestern corner of Phase 5, the spoiled excavation stockpiles have been levelled out for future use.

Environmental controls relating to vegetation and rehabilitation are largely being implemented effectively. Indigenous re-vegetation is evident in completed areas, while Kikuyu grass has been planted along sections west of the wetland. While this assists with rapid stabilisation, Kikuyu is an invasive species in riparian and wetland environments and poses a risk of encroachment into sensitive areas. Management measures should be imposed to ensure that the Kikuyu does not encroach into the wetland. Alternatively, a physical barrier can be imposed to separate the Kikuyu and planting area from the wetland buffer.

Overall, construction-related impacts such as dust and waste are being well managed, with dust suppression measures implemented on exposed surfaces and access roads. Waste management systems are in place.

ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

TABLE 3: ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

No.	EMP REQUIREMENT	COMPLIANCE FINDING
1.	Prevention of Loss of Natural Vegetation	
1.1	Clearly demarcate all no-go areas, including 10 m wetland buffers and the 30 m Modderrug River buffer, prior to any site works.	All no-go areas, including the 10 m wetland buffers, are demarcated using shade cloth and fencing; however, no gaps in demarcation should occur, and ongoing installation of individual site fencing along the wetland buffer must ensure full continuity. Demarcation must be regularly inspected and maintained to ensure full continuity and prevent unauthorised access.
1.2	Restrict all activities to demarcated working areas and prevent encroachment into buffer zones and open space areas.	Construction activities are generally restricted to demarcated working areas. Temporary placement of spoil within the staked wetland buffer area was noted and must be avoided; all spoil within buffer zones must be removed and the area ripped to facilitate rehabilitation. Ongoing monitoring is required to prevent recurrence
1.3	Limit vegetation clearing strictly to the immediate working area for each phase.	Vegetation clearing has been limited to the immediate working areas associated with Phase 4A, 4B, and the swale preparation, in line with approved development footprints.
1.4	Implement plant rescue prior to any vegetation clearing, as directed by the ECO, and maintain a record of rescued species.	Plant rescue was considered prior to clearing; however, no species requiring rescue were identified within the affected areas during this phase.
1.5	Store rescued plants within an on-site nursery for use in rehabilitation.	Not applicable for this phase, as no plant rescue was required.
1.6	Continue alien invasive vegetation clearing in accordance with NEMBA requirements.	Alien invasive vegetation clearing is ongoing within wetland and buffer areas as part of routine environmental management;

		however, Kikuyu grass planted west of the wetland presents an encroachment risk and must be managed through monitoring, maintenance, or the installation of a physical barrier to prevent spread into the buffer.
1.7	Prevent disturbance of vegetation within buffer areas except where authorised for stormwater and services infrastructure.	Vegetation within buffer areas remains largely undisturbed, except for authorised stormwater infrastructure works undertaken in accordance with the approved Stormwater Management Plan; however, disturbed sections impacted by spoil stockpiling require rehabilitation.
1.8	Undertake ongoing rehabilitation and maintenance of buffer areas using indigenous vegetation.	Rehabilitation of disturbed buffer areas is ongoing, with topsoil replacement and indigenous grass seeding implemented following disturbance; areas impacted by spoil and construction activities must be prioritised for rehabilitation and stabilisation.
2.	Prevention of Soil Erosion	
2.1	Strip and stockpile topsoil separately from subsoil prior to construction activities.	Topsoil has been stripped and stockpiled separately from subsoil for use in rehabilitation and swale construction.
2.2	Protect topsoil stockpiles from wind and water erosion and prevent contamination.	Topsoil stockpiles are being managed to prevent contamination and erosion; however, care must be taken to ensure stockpiles remain outside of sensitive areas and do not encroach into buffer zones.
2.3	Limit disturbance of soil to active work areas only and avoid unnecessary exposure.	Soil disturbance is largely confined to active work areas, including Phase 4 construction zones and associated infrastructure.
2.4	Install erosion control measures (e.g. silt fencing, sandbags, mulch, swales, brush layering) in all exposed and high-risk areas.	Erosion control measures, including silt fencing, sandbags, and additional hay bale barriers, have been installed and enhanced following ECO recommendations; continued monitoring is required, particularly at stormwater outlets within the buffer areas.
2.5	Implement the approved Stormwater Management Plan to manage runoff and prevent erosion.	The approved Stormwater Management Plan is being implemented, with stormwater outlets and energy dissipators

		functioning as designed; however, erosion at outlet points must be continuously monitored and addressed where necessary.
2.6	Inspect trenches, pipelines, and disturbed areas regularly for erosion and reinstate immediately where required.	Trenches and disturbed areas are regularly inspected, with reinstatement and shaping undertaken as construction progresses.
2.7	Backfill trenches correctly (subsoil first, then topsoil) and restore original contours to prevent preferential flow paths.	Backfilling of trenches has been undertaken correctly, with topsoil and subsoil replaced in the appropriate sequence and contours restored.
2.8	Stabilise all disturbed areas through re-vegetation or cover within required timeframes.	Stabilisation of disturbed areas is ongoing through re-vegetation and grass seeding; however, Kikuyu grass must be managed to prevent encroachment into wetland areas.
2.9	Ensure silt traps are installed and maintained, and cleared regularly to remain effective.	Silt control measures are in place and maintained, with additional protection implemented at stormwater outlets to prevent sedimentation of wetlands.
3.	Prevention of Pollution	
3.1	Ensure all construction vehicles and machinery are well-maintained and free of leaks.	Construction vehicles and machinery are generally well-maintained, with no leaks reported during inspections.
3.2	Use drip trays for stationary vehicles and repair or remove leaking equipment immediately.	Drip trays and standard good practices are implemented where required; however, stricter control is required around hazardous material handling following the paint wash incident.
3.3	Prohibit refuelling, servicing, or storage of hazardous materials within wetland or riparian buffer areas.	No refuelling or hazardous material storage has been observed within wetland or buffer areas.
3.4	Provide adequate ablution facilities (minimum ratio compliant) and service regularly to prevent leakage.	Ablution facilities are provided on site and are maintained appropriately.
3.5	Implement strict litter control and daily site clean-up to prevent waste entering the environment.	Litter control measures are in place, with regular site clean-ups conducted; however, continued vigilance is required to prevent wind-blown litter.

3.6	Store waste in covered, secure containers and dispose of at licensed facilities only.	Waste is stored in designated skips and stockpile areas; skips must be covered to prevent litter dispersion.
3.7	Prevent any contaminated runoff, cement slurry, or wash water from entering stormwater systems or watercourses.	Paint residue was observed within a stormwater outlet in Phase 4B; contractors must be reminded that this is not permissible and the residue must be removed.
3.8	Ensure cement and concrete mixing occurs only on impermeable, bunded surfaces.	Cement mixing practices are generally compliant; however, cement batching on plastic sheeting was observed at one location, and the use of mortarboards or mixing on foundations is preferred to prevent spills and runoff.
3.9	Prohibit washing of ready-mix trucks on-site.	No washing of ready-mix trucks on site has been observed.
4.	Management of Open Space and Buffer Areas	
4.1	Implement ongoing alien invasive species control in accordance with the approved Alien Control Plan.	Alien invasive species control is ongoing within wetlands and buffer areas; however, management of Kikuyu spread is required to prevent encroachment into sensitive areas.
4.2	Rehabilitate all disturbed areas using indigenous vegetation as recommended by specialists.	Rehabilitation of disturbed areas using indigenous vegetation is ongoing, particularly within Phase 4B and swale areas.
4.3	Re-vegetate exposed topsoil areas as soon as possible to prevent degradation.	Exposed topsoil areas are being re-vegetated progressively, although full stabilisation is still in progress.
4.4	Rescue and reuse topsoil for landscaping and rehabilitation.	Topsoil is being reused for rehabilitation and landscaping, including swale construction.
4.5	Maintain ecological corridors to support biodiversity (CBA and ESA principles).	Ecological corridors and wetland areas remain largely intact; however, localised disturbances within buffer zones require rehabilitation and monitoring.
4.6	Maintain pathways using appropriate materials (e.g. woodchips, raised walkways) to prevent erosion.	Not applicable at this stage; pathways have not yet been fully developed.
4.7	Ensure security fencing is located outside of riparian buffer areas.	Security fencing is appropriately located outside of riparian buffer areas.

4.8	Prevent uncontrolled access and movement within open space and buffer areas.	Access to buffer areas is controlled, with demarcation measures in place and generally adhered to.
4.9	Ensure long-term maintenance is implemented by the HOA, including allocation of budget for open space management.	Long-term maintenance by the HOA will be required; this will be implemented during the operational phase.
5.	Demarcation and Protection of No-Go Areas	
5.1	Demarcate all no-go areas using appropriate and visible methods (e.g. shade cloth, fencing, danger tape) prior to construction.	No-go areas are clearly demarcated using fencing, shade cloth, and green shade netting, with additional site-specific fencing being installed along the wetland buffer to strengthen protection.
5.2	Ensure all personnel are informed of no-go area boundaries during environmental induction.	Personnel have been informed of no-go areas during environmental induction and ongoing site communication.
5.3	Prohibit any activities, storage, or access outside of approved working areas.	Activities are largely restricted to approved working areas, with temporary spoil placement within the buffer identified and requiring corrective action.
5.4	Obtain written ECO approval for any temporary access through no-go areas.	No unauthorised access through no-go areas has been observed.
5.5	Prevent use of no-go areas for breaks, access, or storage.	No use of no-go areas for storage or access has been observed following corrective actions.
5.6	Monitor compliance continuously and implement penalties for non-compliance where applicable.	Compliance monitoring is ongoing, with no significant recurring non-compliances noted.
6.	Stormwater and Wetland Management	
6.1	Clearly demarcate all stormwater infrastructure alignments prior to construction.	Stormwater infrastructure alignments are clearly defined and implemented as per plans.
6.2	Ensure all infrastructure is located outside of wetland areas and within approved buffer zones.	Infrastructure is located within approved buffer areas and outside wetlands.
6.3	Conduct plant rescue and, where required, fauna surveys prior to works within buffer areas.	Plant rescue not required due to lack of suitable species.
6.4	Prevent sedimentation and contamination of wetlands and the	Measures implemented to prevent sedimentation, including silt

	Modderrug River.	fencing and hay bales.
6.5	Inspect watercourses weekly for signs of erosion, sedimentation, or pollution.	Watercourses are monitored, with additional erosion protection required at outlet points where necessary.
6.6	Rehabilitate disturbed wetland buffer areas immediately after construction.	Rehabilitation of disturbed wetland buffer areas is ongoing; this must include areas impacted by spoil and contamination incidents.
6.7	Ensure excavated material is stockpiled correctly and reinstated to original contours.	Excavated material is appropriately managed and reinstated to original contours. The southern stormwater swale within Phase 5, forming part of the Sustainable Drainage System (SuDS), is under construction, with shaping undertaken using rescued topsoil. The placement of these structures remains within the approved staked areas. Sewer manholes have been installed along its alignment.
6.8	<i>Stormwater Management – Wetlands:</i> Direct stormwater discharge to designated outlet structures (e.g. OHS2) located downstream to minimise impacts on wetlands.	Stormwater discharge is directed to approved outlets with energy dissipators.
6.9	Ensure stormwater pipelines are installed outside the 10 m buffer where possible, and never within the delineated wetland area.	Pipelines are located outside wetlands where possible.
6.10	Clearly demarcate pipeline alignments prior to excavation to avoid unnecessary disturbance.	Pipeline alignments were pegged prior to excavation.
6.11	Stockpile excavated material on the outer edge of trenches away from wetlands.	Excavated material was stockpiled appropriately.
6.12	Backfill trenches correctly and restore original contours to prevent preferential flow paths.	Backfilling and contour restoration completed.
6.13	Re-vegetate disturbed trench areas and implement temporary erosion control until vegetation is established.	Re-vegetation and erosion control measures are in place.
6.14	Ensure all outlet structures (OHS1, stilling basins) are located within buffer areas and not within wetland boundaries.	Outlet structures are within buffer areas, not wetlands.

6.15	Align outlet structures with natural flow direction to prevent erosion.	Outlets are aligned with natural flow paths.
6.16	<i>Stormwater Management – Modderrug River:</i> Install swales outside the 30 m buffer to attenuate flows, trap sediment, and collect litter.	Swale preparation is underway; vegetation and maintenance measures will be implemented as construction progresses.
6.17	Ensure swales are vegetated with indigenous species and maintained to prevent erosion.	Noted, vegetation and maintenance measures will be implemented as construction progresses.
6.18	Install gabion structures and reno mattresses at discharge points to dissipate energy and prevent scouring.	Noted, vegetation and maintenance measures will be implemented as construction progresses.
6.19	Maintain all stormwater systems to manage sediment, nutrients, and pollutants effectively.	Noted, vegetation and maintenance measures will be implemented as construction progresses.
6.20	Inspect swales at least twice annually (start and end of wet season) for erosion, blockages, or channelisation.	Noted, vegetation and maintenance measures will be implemented as construction progresses.
7.	Fauna Protection	
7.1	Prevent harm, disturbance, or removal of fauna within the development area.	No harm to fauna reported.
7.2	Relocate any fauna encountered during construction under ECO supervision.	No fauna relocation required.
7.3	Prohibit hunting, trapping, or harming of animals by site personnel.	No hunting or disturbance observed.
7.4	Restrict access to riparian areas except for authorised activities.	Access to sensitive areas remains restricted.
8.	Construction Site and Materials Management	
8.1	Store all materials within approved areas and prevent encroachment into sensitive zones.	Materials are stored within designated development areas.
8.2	Ensure stockpile areas are demarcated and protected with erosion control measures.	Stockpile areas are demarcated; ongoing management is required to ensure separation of materials and erosion protection.
8.3	Prohibit storage of materials on steep slopes or within buffer areas.	No storage within buffer areas has been observed following the removal of previously stockpiled material.
8.4	Remove excess material to approved disposal sites where not	Excess material is stockpiled for reuse or removed where

	required for construction.	necessary. In Phase 5, previously dumped soil has been levelled for future use.
9.	Waste Management	
9.1	Implement an integrated waste management approach (reduce, reuse, recycle, dispose).	Waste management practices are generally implemented; however, recycling measures are not yet in place.
9.2	Provide adequate waste bins and ensure regular removal to licensed facilities.	Waste bins and skips are provided across the site and are regularly serviced.
9.3	Prevent illegal dumping on or off-site.	No illegal dumping has been observed.
9.4	Maintain documentation of all waste disposal.	Waste disposal practices are ongoing; documentation should be maintained where applicable.
9.5	Ensure waste storage areas are secure, covered, and protected from wind.	Waste storage areas are in place; skips must be covered to prevent wind-blown litter.
10.	Access and Traffic Management	
10.1	Restrict construction vehicles to designated access routes only.	Vehicles are restricted to designated access routes.
10.2	Prevent mud and debris from being deposited onto public roads.	Roads are regularly cleaned, including Providence Road.
10.3	Maintain safe traffic flow with appropriate signage and demarcation.	Traffic management is adequate for current activities.
10.4	Monitor access points and contractor compliance regularly.	Contractor compliance is monitored by the ECO.
11.	Concrete and Cement Works	
11.1	Clearly demarcate batching and mixing areas prior to use.	Mixing areas require clearer demarcation.
11.2	Ensure all mixing occurs on impermeable, bunded surfaces.	Bunding and impermeable surfaces must be consistently implemented, replacing the use of plastic sheeting.
11.3	Prevent cement-contaminated water from entering soil or watercourses.	No contamination observed.
11.4	Dispose of contaminated materials at approved facilities.	Contaminated materials managed appropriately.
11.5	Prohibit sourcing of water from natural watercourses for construction use.	No water abstraction from natural sources observed.

12.	Rehabilitation and Stabilisation	
1.1	Rehabilitate all disturbed areas within specified timeframes after construction.	Rehabilitation is ongoing.
12.2	Remove all construction rubble and waste from site.	Waste removal ongoing.
12.3	Loosen compacted soil and replace topsoil prior to re-vegetation.	Soil loosening implemented in areas such as road verges.
12.4	Re-establish vegetation in accordance with the Landscape Master Plan.	Vegetation re-establishment in progress.
12.5	Maintain and monitor rehabilitated areas to ensure successful establishment.	Monitoring ongoing.
13.	Wetland Rehabilitation and Functional Integrity	
13.1	Ensure all development activities remain outside the delineated wetland areas.	Wetlands remain largely undisturbed, with all infrastructure located within buffer areas; however, localised impacts from spoil and contamination require remediation.
13.2	Maintain hydro-functional characteristics of wetlands to support ecological functioning.	Hydrological functioning maintained.
13.3	Improve floral and faunal biodiversity within wetlands and associated buffer areas through active rehabilitation.	Biodiversity improvements ongoing through alien clearing.
13.4	Remove all building rubble, excess soil, and debris from wetland areas and dispose of at approved facilities.	Buffer clean-up underway; spoil within buffer areas must be removed and ripped.
13.5	Loosen compacted soils and prepare surfaces for rehabilitation using appropriate methods.	Soil preparation implemented.
13.6	Re-vegetate disturbed areas using indigenous vegetation and appropriate grass seed mixes as directed by the ECO.	Indigenous vegetation re-established.
13.7	Implement additional erosion control measures within wetlands where required.	Additional erosion controls installed.
13.8	Prevent ponding or inundation upstream of road crossings.	No issues noted; infrastructure supports hydrological continuity.
13.9	Install appropriately sized culverts at crossings to maintain	No issues noted; infrastructure supports hydrological continuity.

	hydrological connectivity.	
13.10	Stabilise stream beds and banks below crossings to prevent erosion and channel incision.	No issues noted; infrastructure supports hydrological continuity.
14.	Wetland and Riparian Habitat Management	
14.1	Remove all historical debris, soil, and vegetation dumped within wetland areas to restore flow and connectivity.	Historical debris removal ongoing.
14.2	Reshape and stabilise eroded wetland banks using indigenous vegetation.	Bank stabilisation through vegetation.
14.3	Implement and maintain 10 m wetland buffers and 30 m river buffer as no-go areas.	Buffers maintained as no-go areas.
14.4	Continue alien invasive vegetation clearing within wetlands and buffer areas.	Alien vegetation clearing is ongoing.
14.5	Monitor and control invasive species (e.g. <i>Rubus fruticosus</i>) to prevent re-establishment.	Monitoring of invasive species ongoing.
14.6	Install gabion weirs where required to reduce flow velocity and prevent erosion during high-flow events.	Energy dissipation structures (reno mattresses) are installed where required.
15.	Alien Vegetation Management	
15.1	Conduct ongoing alien invasive plant clearing within wetlands and the Modderrug River buffer.	Alien vegetation clearing is ongoing, with follow-up and monitoring required to prevent re-establishment.
15.2	Implement follow-up clearing annually to prevent re-infestation.	Noted. Alien vegetation clearing is ongoing. Kikuyu grass management must be implemented through controlled planting boundaries or physical barriers to prevent encroachment into the wetland buffer.
15.3	Monitor previously cleared areas for regrowth and address immediately.	Alien vegetation clearing is ongoing, with follow-up and monitoring required to prevent re-establishment.

EMPr Compliance Rating	76.8%
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CONCLUSION

In conclusion, Kapp Environmental Consultants (Pty) Ltd. (KAPPEC) was appointed in April 2026 by Mr. Fred de Kock (the Applicant) as the independent environmental practitioners to undertake an external environmental compliance audit in fulfilment of Condition 18 of the Amended Environmental Authorisation dated 19 March 2025 (Ref: 16/3/3/1/D2/19/0028/24), in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) ("NEMA") and the Environmental Impact Assessment Regulations, 2014 (as amended).

An Environmental Authorisation (EA) was initially issued on 4 November 2010 (DEA&DP Ref: EG12/2/1-AG3-5720) for the proposed change in land use from agricultural to alternative land use for the development of a residential township. Subsequently, an amendment to the EA was approved on 14 December 2022 for a change in ownership as well as an update to the project description. A second amendment application was thereafter approved on 19 March 2025 (Ref: 16/3/3/1/D2/19/0028/24). This amendment provided for revisions to the development layout, including an increase in residential density, the incorporation of delineated wetlands into the development, and the inclusion of associated stormwater management infrastructure.

The external environmental audit and site inspection, undertaken during April 2026, focused on construction activities associated with Phase 4A, Phase 4B, and the Frail Care facility, including the installation of civil services, stormwater infrastructure, and the preparation of swales in accordance with the approved Stormwater Management Plan.

The external environmental audit confirms that the Applicant is largely compliant with the conditions of the EA and the EMPr. The EMPr has proven effective in guiding and mitigating the environmental impacts associated with the construction activities undertaken to date.

The audit identified minor, site-specific non-compliances requiring corrective action. Cement mixing as well as placing should be done on impermeable surfaces, preferably mortarboards or on existing platforms and foundations. All spoil must be removed from buffer areas and the affected areas rehabilitated. An incident of paint wash entering a stormwater outlet was recorded, and the paint residue must be removed.

Ongoing attention is required to monitor erosion, particularly at stormwater outlets, protect topsoil stockpiles from encroachment and contamination, and manage the spread of Kikuyu grass near wetland areas through regular monitoring and removal, while promoting indigenous vegetation within buffer areas.

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' or similar, with a stylized, cursive style.

Renier Kapp
for KAPPEC

ANNEXURE A – SITE PHOTOGRAPHS



View towards the southwest looking onto the Phase 4 assisted living development area. Construction netting in place.



View towards the southeast looking onto the Phase 4 assisted living development area. Construction netting in place.



View towards the southeast looking onto the Phase 4 assisted living development area. Construction netting in place.



View towards the southwest looking onto the Phase 4 assisted living development area.



View towards the southwest looking onto the Phase 4 assisted living development area.



View towards the southwest looking onto the Phase 4 assisted living development area.



The sewer line and stormwater dissipator installed and rehabilitation of phase 4B is in process.



Condition of the frail care development area within phase 4 civil services installations and earthworks in progress



Construction site camp and available storage containers on an existing erf within Phase 4 of the frail care facility



Constructed stormwater outlets within the buffer area of Phase 4B with energy dissipators (reno-matgrass) as seen towards the northeast.



Construction fencing along the wetland buffer being installed.



Construction fencing along the wetland buffer being installed.



Wetland area fenced off with ClearVu fencing. Steel grid towards the southeast.



Wetland area fenced off with ClearVu fencing as seen towards the southeast where the road is proposed.



Buffer area along the wetland with material spoil which must be removed.



Buffer area along the wetland staked. Spoiled material must be removed.



Additional silt protection (hay-bales) installed at the stormwater outlet area to prevent contaminated soil/silt from entering the wetland.



Additional silt protection (hay-bales) installed at the stormwater outlet area to prevent contaminated soil/silt from entering the wetland.



Constructed stormwater outlets within the buffer area of Phase 4B with energy dissipators (reno-matgrass).



Topsoil stockpile placed within an open erven of Phase 3 as seen towards the north.



Northern end of the wetland as seen towards the south within Phase 3.



Paint was washed by contractors, resulting in paint residue entering the constructed stormwater outlet within the Phase 4B buffer area.



Paint were washed by contractors, resulting in paint residue entering the constructed stormwater outlet within the Phase 4B buffer area.



Construction of residence within Phase 3 fully demarcated.



Construction of residences within Phase 3, cement batching on plastic sheeting is insufficient; proper mortarboards and catch pits are required.



Construction of residences within Phase 3, cement batching on existing foundations.



Construction of residences within Phase 3, with a skip available for waste disposal.



Construction of residences within Phase 3, with a skip available for waste disposal.



Construction site camp and available storage containers on an existing erf within Phase 4 of the frail care facility.



Construction site camp and available storage containers on an existing erf within Phase 4 of the frail care facility.



Construction of residences within Phase 3.



Construction of residences within Phase 3, with a skip and chemical toilet in place.



Material placed within the development footprint for civil services installation within the frail care and assisted living facility (associated with Phase 4).



Temporary material laydown area and site camp on an existing erf within Phase 4 (frail care facility).



Temporary material laydown area and site camp on an existing erf within Phase 4 (frail care facility).



Condition of the frail care development area within phase 4, site clearance in progress.



Site office of the frail care development area within Phase 4.



Condition of the frail care development area within phase 4, site clearance in progress.



Topsoil and subsoil stockpile area within the Phase 4A and 4B development area. Stockpiles separated.



Topsoil and subsoil stockpile area within the Phase 4A and 4B development area. Stockpiles separated.



Chemical toilet in place adjacent to the frail care facility development area and main access road being constructed.



Current main access road being constructed.



Construction of the main access road adjacent to the Phase 4 frail care development area in progress.



Construction of the main access road adjacent to the Phase 4 frail care development area in progress.



Condition of the frail care development area within Phase 4, pegged and demarcated.



Construction of the main access road adjacent to the Phase 4 frail care development area in progress.



Construction of the main access road adjacent to the Phase 4 frail care development area in progress.



Jojo tank available at the Phase 4 development area for dust suppression.



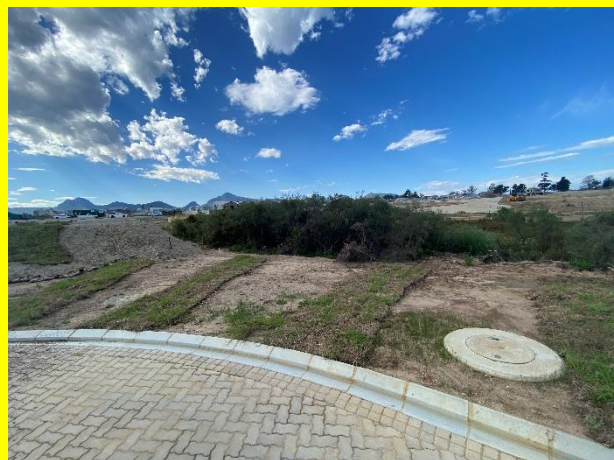
Phase 4A and 4B development area cleared for civil services installation and construction of top structures.



Phase 4A and 4B development area cleared for civil services installation and construction of top structures.



Phase 4A and 4B development area cleared for civil services installation and construction of top structures.



Kikuyu grass being planted towards the east of the wetland. Care must be taken to ensure encroachment is managed.



The sewer line and stormwater dissipator installed and rehabilitation of phase 4B is in process.



Wetland area fenced off with ClearVu fencing.



Kikuyu grass being planted towards the east of the wetland. Care must be taken to ensure encroachment is managed.



The sewer line and stormwater dissipator installed and rehabilitation of phase 4B is in process.



Kikuyu grass being planted towards the southeast of the wetland. Care must be taken to ensure encroachment is managed.



Phase 4A and 4B development area cleared for civil services installation and construction of top structures.



The sewer line and stormwater dissipator towards the north.



The sewer line and stormwater dissipator towards the south of Phase 4.



Stormwater outlets installed with energy dissipators (reno-mattress) in the wetland buffer area. Erosion should be monitored.



Swale created with rescued topsoil within Phase 5.



Swale created with rescued topsoil within Phase 5. Swale placement remains within the staked area.



Swale created with rescued topsoil within Phase 5. Swale placement remains within the staked area.



Swale created with rescued topsoil within Phase 5.



Swale created with rescued topsoil within Phase 5.



Swale created with rescued topsoil within Phase 5.



Swale created with rescued topsoil within Phase 5.
Sewer manholes installed along the swale.



Condition of the vegetation towards the future development area.



Condition of the vegetation towards the future development area.



Dumped soil has been levelled at the northernmost section of the Phase 5 future development, as seen towards the northeast.



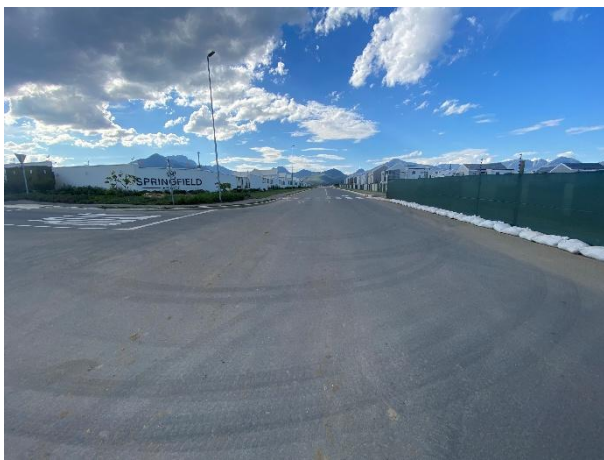
Dumped soil has been levelled at the northernmost section of the Phase 5 future development, as seen towards the north.



Dumped soil has been levelled at the northernmost section of the Phase 5 future development, as seen towards the north.



Dumped soil has been levelled at the northernmost section of the Phase 5 future development, as seen towards the southeast.



Condition of Providence Road at the Springfield Estate Entrance. The Kraaibosch Park development is fully demarcated.



Condition of Providence Road at the Springfield Estate Entrance.