

15 August 2025

DEA&DP Reference: 16/3/3/5/A6/7/2020/24; 16/3/3/1/A6/7/2046/20

**Department of Environmental Affairs and Development Planning
1 Dorp Street, Cape Town, 8001**

Attention: Rondine Isaacs

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Copied to:

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Client Representatives: **Mr Andre Swart:** andre@igual.co.za

ECOs: **Ms Taryn Brickhill:** taryn@chand.co.za
Ms Sabrina Thorndike: sabrina@chand.co.za

Dear Rondine,

SUBMISSION OF THE FIRST NEMA EIA REG 34 EXTERNAL AUDIT REPORT - DEVELOPMENT OF RESIDENTIAL AND RECREATIONAL FACILITIES ON ERVEN 242 AND 212, BISHOPSCOURT (THE PROTEA VILLAGE COMMUNITY LAND CLAIM: PHASE 1) CONSTRUCTION PHASE, MAY 2025

Herewith enclosed, please find the first external environmental audit report for this project, as required by condition 15.2 of the Environmental Authorisation (Ref. 16/3/3/1/A6/7/2046/20), issued on 20 May 2021.

Please do not hesitate to contact me with any queries regarding the report.

Yours sincerely,

Christine Rabie

Environmental Management Audit - NEMA EIA Reg 34 Audit – Construction Phase: May 2025

Development Of Residential and Recreational Facilities on Erven 242 And 212, Bishopscourt for the Protea Village Community Land Claim: Phase 1

DEA&DP Reference: 16/3/3/1/A6/7/2046/20 and 16/3/3/5/A6/7/2020/24

FINAL REPORT

8 JULY 2025

**Prepared by:
Christine Rabie ooo**

**Prepared for:
Protea Village Development Company (Pty) Ltd**

Executive Summary

This report presents the findings of the first external construction-phase environmental audit for Protea Village Phase 1, conducted in accordance with Regulation 34 of the NEMA EIA Regulations and the conditions of the Environmental Authorisation (EA) and Environmental Management Programme (EMPr).

The audit covered construction activities currently underway on Erven 242 and 212 in Bishopscourt, including the installation of roads, bulk services, stormwater infrastructure, and site establishment elements. Construction commenced in November 2024, following pre-construction preparations including plant rescue and tree felling. The audit was undertaken in May 2025 and included site inspection, document review, and verification of compliance with environmental conditions and management measures.

Overall, the audit found that environmental management on site is being implemented to a high standard. The dedicated and proactive involvement of the Environmental Control Officer (ECO) and the Environmental Officer appointed by the principal contractor has ensured intensive on-site monitoring and rapid response to issues and potential risks. Their combined efforts have significantly contributed to maintaining compliance and environmental integrity during the construction phase.

However, some compliance issues were recorded, some administrative and some related to management of physical works on site. Administrative non-compliances included the late submission of this first external audit, which fell outside the required three-month window following construction commencement, and the absence of certain mandated sustainability measures—relating to energy, water, and material efficiency—in the current version of the Architectural Design Guidelines. Physical site-based findings as recorded by the ECO included isolated incidents involving damage to trees marked for retention and an incident affecting fauna (owlets), all of which were addressed by the project team but nevertheless resulted in partial compliance with EMPr provisions for this audit period. While not all findings require corrective action, the audit puts forward several targeted recommendations to strengthen environmental management going forward. These include improving the traceability and structure of ECO reporting, amending the EMPr to streamline ECO monitoring and reporting requirements, updating the design guidelines to incorporate mandatory efficiency measures, obtaining written confirmation from the freshwater ecologist on implementation of design features, and enhancing on-site protection for trees that may be retained. Implementation of these measures will serve to improve environmental performance, ease EMPr implementation, reduce risk, and reinforce alignment with regulatory commitments as the project progresses.

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Abbreviations	
DEA&DP	Department of Environmental Affairs & Development Planning
DEO	Designated Environmental Officer (of the Contractor)
EA	Environmental Authorisation (<i>Ref: 16/3/3/1/A6/7/2046/20 issued on 20 May 2021, as amended on 6 May 2024 ref 16/3/3/5/A6/7/2020/24</i>)
ECO	Environmental Control Officer (Client Agent)
EIA	Environmental Impact Assessment
EMPr	Amended Environmental Management Programme: PROPOSED DEVELOPMENT OF RESIDENTIAL AND RECREATIONAL FACILITIES ON ERVEN 242 AND 212, BISHOPSCOURT FOR THE PROTEA VILLAGE COMMUNITY LAND CLAIM: PHASE 1, <i>Chand Environmental Consultants, March 2024</i>)
EO	Environmental Officer (representing the contractor)
H&S	Health & Safety
I&APs	Interested and Affected Parties
NEMA	National Environmental Management Act (No 107) of 1998
MS	(Environmental) Method Statement
MSDS	Material Safety Data Sheet
Designations and Definitions	
Auditor: The external independent environmental auditor, Mrs Christine Rabie, who undertook this environmental management audit.	
Contractor (Principal): Groeneveld Civils	
EA Holder: Protea Village Development Company (Pty) Ltd	
Environmental Control Officer (ECO): Taryn Brickhill of Chand Environmental Consultants	
Environmental Officer (EO): Mr Johan Lubbe	
Evidence: Written records or physical evidence or observations or oral statements given during interviews. Where possible oral statements are collaborated between more than one independent party.	
Site/Development: Project site located on Erf 212 and Erf 242, Bishopscourt, and specifically the area that contains the activities authorised by the EA (refer to sections B and C of the EA).	

1 INTRODUCTION

1.1 BACKGROUND

Christine Rabie Environmental Management Solutions was appointed on behalf of the EA Holder, the Protea Village Development Company (Pty) Ltd, to undertake a construction phase external environmental audit of this project's compliance with the conditions of the Environmental Authorisation (EA) Ref. 16/3/3/1/A6/7/2046/20, as issued by the Department of Environmental Affairs & Development Planning (DEA&DP) on 20 May 2021 (as amended on 6 May 2024 to update the contact details of the holder, the activity description, the description of the preferred alternative, the details of the Environmental Assessment Practitioner, EA conditions 10,14,23, and the Site Plan), as well as the amended Environmental Management Programme (EMPr) for the project, dated March 2024. This is the first external audit undertaken for the project.

Construction commenced in November 2024, with the principal contractor, Groeneveld Civils establishing on site from 4 November. Prior to this, search and rescue of plants was undertaken in June 2024 (with a follow up in November) and removal of large trees not to be retained within the development was undertaken by Stodart in October 2024. The current phase of construction consists of the construction of the services, roads, stormwater ponds, boundary wall and gate house.

The authorised development entails (refer to the EA section B) the development of residential and recreational facilities on Erven 242 and 212, Bishopscourt (the Protea Village Community Land Claim: Phase 1), including:

- Green public open space areas;
- A residential area for the 86 families of the Protea Village Community and associated services infrastructure; and
- A combination of freehold and leasehold residential opportunities and associated services infrastructure.

Erf 242:

Erf 242 will comprise of up to 86 plots and homes for the returning Protea Village Community. It will also have an internal road network and pocket parks, both of which will be managed by the City of Cape Town from an operational perspective.

Erf 212:

Erf 212 will include residential opportunities for private sale and makes provision for a combination of freehold and leasehold sale. For Phase 1, up to five residential stands (i.e., serviced plots) will be developed for private sale and approximately **35 (thirty-five)** residential units will be developed for leasehold sale. Erf 212 will include approximately **43,312 m²** of public open space, including the Liesbeek River and the two associated converging streams, as well as a network of pedestrian footpaths/boardwalks and/or bridges. The Recreation and Parks Department of the City of Cape Town will maintain the open space areas from the top of the embankment. The area of 1212m² will form part of the public park access area and will be zoned Public Open Space. The area of 1212m² will be transferred to the City of Cape Town.

The proposed development will connect to existing municipal infrastructure in terms of water supply, transport, electricity supply, sewage disposal, solid waste removal. There is an existing water main in Winchester Avenue which will provide a suitable connection point, and the City of Cape Town has confirmed that there is sufficient capacity. There is also an existing 160mm diameter sewer main along Winchester Avenue which the City of Cape Town has confirmed capacity for. Sufficient electrical capacity also exists within the system and electricity will be provided by cutting and extending the existing Rhodes Drive 11kV cable with new 11kV cables along Kirstenbosch Drive, which will feed a new miniature sub-station to be installed at the entrance to Erf 212. Low voltage underground cable feeders will supply the two individual underground reticulation networks for both erven.

Storm water management will comprise of a combination of storm water components including channels, pipes, two enhanced dry swales and two dry attenuation ponds. The Roads and Storm Water Branch of the City of Cape Town has committed to the maintenance of Kirstenbosch Drive and the roads and storm water infrastructure on Erf 242.

The residential areas will be accessed by a network of internal access roads. Access to the proposed Protea Village Community homes on Erf 242, as well as to the proposed private freehold/leasehold estate on Erf 212 will be gained from a shared point off Kirstenbosch Drive and will also provide the primary access to the proposed public open space Area on Erf 212. Approximately 16 parking bays will be developed for public use. The proposed development also includes two access points off Winchester Road: one for each of the pockets of the proposed private freehold/leasehold estate on Erf 212. However, only the access to the northern freehold stands is included as part of Phase 1. Kirstenbosch Drive will also be furnished with an approximately 3m-wide sidewalk and cycle path along the southern side, including two bus embayments nearby the entrances to the development on Erven 242 and 212.

Some of the wetlands will be filled in and/or reshaped for the proposed development to be realised. The listed activities are relative to both the movement of material and development/construction activities within watercourses, as well as the clearance of indigenous vegetation which occur within the following watercourses on site:

- Window Stream;
- Nursery Stream;
- Liesbeek River;
- Wetland 10;
- Wetland 11 (and associated seep);
- Wetland 9;
- Wetland 6;
- Wetland 7;
- Wetland 8; and
- Wetland 1 (only the eastern-most portion of Wetland 1 (just beyond/downstream of Pond 3) will be filled in for the development of homes (specifically the "row housing" and associated infrastructure component on Erf 212), as well as some reshaping and works for the establishment of the proposed parking lot for the public open space and for the storm water attenuation ponds and associated reshaped wetland area).

Clearing of indigenous vegetation throughout Erven 242 and 212 will also be undertaken. The total extent of indigenous vegetation to be cleared is approximately 5457.16m².

Phase 2 does not form part of this environmental authorisation and is not included in the audit scope. *(Note that phasing is more detailed in the EMPr than what was presented as part of the Basic Assessment Process. Phase 1, Phase 2, Phase 3, Phase 4, and Remainder 212 in the EMPr Figure 2 phasing plan encompass the "Phase 1" falling under the Environmental Authorisation being audited.)*

Refer to the Figure 1 Aerial View of (pre-development) site, Figure 2 Site Plan and Figure 3 Landscape Master Plan following.



Figure 1: Aerial view of (pre-development) site- within pink polygon



Figure 2: Site Plan (Updated Layout March 2024)



Figure 3: Landscape Master Plan (Updated March 2024)

1.2 SCOPE AND TERMS OF REFERENCE

This audit is a **construction phase audit**, meaning that the project's compliance with **pre-construction and construction phase requirements** is assessed to date based on documentary evidence such as ECO reports, method statements, and compliance records, in addition to confirming the condition of the project site through a physical site inspection and recommending any necessary improvements.

This audit and related report fulfil the requirements for external environmental audits as detailed in Regulation 34 of the NEMA (National Environmental Management Act (No 108) of 1998) EIA (Environmental Impact Assessment) Regulations as well as Condition E.15, 16 and 17 of the EA, which are as described hereafter. The terms of reference for the audit were developed from these requirements as well as from current best management practice for environmental audits of this nature.

1.2.1 EA requirements

Conditions 15, 16 and 17 of the EA require the Holder of the EA conduct environmental audits on compliance with the conditions of the issued Authorisation and EMPr. The first environmental audit report (this audit report) must be submitted to the competent authority (DEA&DP) three months after commencement of the construction phase. The report must be submitted by an independent person per the requirements of Section 34 of the NEMA EIA Regulations 2014 (as amended). In addition, the audit reports must:

- Provide verifiable findings, in a structured and systematic manner, on-
 - a) the level of compliance with the conditions of the Environmental Authorisation and the EMPr and whether this is sufficient or not; and
 - b) the extent to which the avoidance management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr and highlight whether this is sufficient or not;

- identify and assess any new impacts and risks as a result of undertaking the activity;
- evaluate the effectiveness of the EMPr;
- identify shortcomings in the EMPr;
- identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;
- indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;
- include a photographic record of the site applicable to the audit; and
- be informed by the ECO reports.

The EA holder must notify all potential and registered I&AP's of the submission of audit reports within 7 days thereof and make the report available to them on request, and on a publicly accessible website if the holder has such a facility).

1.2.2 NEMA EIA Regulation 34 Requirements

NEMA Regulation 34 requires the holder of the Authorisation to ensure that compliance with the conditions of the EA and EMPr is audited by an independent person with relevant environmental auditing expertise and submit an environmental audit report to the competent authority (in this case, the DEA&DP) at intervals as indicated in the EA, and including the contents specified in Appendix 7 of the NEMA EIA Regulations 2014 (as amended).

The Appendix 7 content requirements are tabulated as follows. The corresponding section number of this report where this is addressed is provided here as a cross reference to demonstrate that this report includes the required content.

Appendix 7 of the NEMA Regulations requirement	Corresponding section in this audit report
(1) Provide recommendations regarding the need to amend the EMPr;	Section 4
(2a) Report on the level of compliance with the conditions of the EA and the EMPr and the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr;	Section 3
(2b) Identify and assess any new impacts and risks as a result of undertaking the activity;	Section 4
(2c,d) Evaluate the effectiveness of the EMPr and any shortcomings;	Section 4
(2e) Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.	Section 4
(3.1 a) contain the details of the independent person who prepared the environmental audit report and their expertise;	Section 6
(3.1 b) declaration that the independent auditor is independent;	Section 6
(3.1 c) indication of the scope of, and the purpose for which, the environmental audit report was prepared;	Section 1
(3.1 d) description of the methodology adopted in preparing the audit report;	Section 2
(3.1 e) indication of the ability of the EMPr to sufficiently provide for the avoidance, management and mitigation of the environmental impacts associated with the undertaking of the activity on an ongoing	Section 4

basis and the closure of the facility and ensure compliance with the provisions of the EA and EMPr	
(3.1 f) a description of any assumptions made, and any uncertainties or gaps in knowledge;	Section 1.3
(3.1 g) a description of any consultation process that was undertaken during the course of carrying out the environmental audit report;	Section 2
(3.1 h) summary and copies of any comments that were received during any consultation process; and	n/a
(3.1 i) any other information required by the competent authority.	EA Condition 15-17 described in section 1.2.1

1.2.3 Terms of reference for this audit

The terms of reference for this audit are as follows:

- **Prepare for the audit** - review the project EA, EMPr and other relevant background documents, and prepare information requirements and checklists for the audit.
- **Audit - site inspection, interviews and document review:** Conduct a site inspection, interview* relevant management and construction personnel/project consultants and review site and submitted documentary evidence to verify compliance of the development with the Conditions of the EA and EMPr requirements (* interviews can be done at the time of the site inspection, telephonically or information can be requested via-email);
- **Review the EMPr** in terms of its effectiveness and scope to mitigate environmental risks/impacts on the site, based on the findings of the site inspection, interviews and compliance audit and recommend EMPr amendments if deemed required.
- **Draft audit report** of findings and recommendations and issue draft to relevant project personnel to check for accuracy and fairness and provide any missing information.
- **Finalise the audit report** and submit to the DEA&DP within the required time frames.

1.3 ASSUMPTIONS AND LIMITATIONS

Assumptions are:

- It is assumed that all information received from the project owner/personnel/consultants is accurate and correct.

Limitations to the study are:

- This is not a full Legal Compliance Audit (compliance with all applicable environmental legislation). The audit is restricted to requirements of the EA Conditions and EMPr requirements applicable to this project and relevant to the current stage of development implementation.
- The audit inspection observes a moment in time and cannot verify the management of all activities or record all contraventions/issues that are not directly observable or documented.
- The environmental audit findings and conclusions are based solely upon the observations of the auditor and information provided to the auditor by interviewed parties, which the auditor assumes to be correct. Wherever possible, verification in terms of visual inspection or examination of supporting documentation was used to confirm information provided. The auditor cannot be held responsible for findings and conclusions which resulted from inaccurate information, information being withheld from the auditor or which were not available during the audit.

2 METHODOLOGY

2.1 Approach

The auditor tabulated requirements from the EA and EMPr, relevant to the scope of this construction phase audit, in the Audit Checklist in Section 3.2 that follows. These are the items which have been investigated and assessed during the audit. The audit site inspection was undertaken on the 7th of May 2025 by auditor Christine Rabie.

Documentary information and evidence was supplied by the ECO and/or inspected on site as follows:

- **Archaeological Monitoring Report:** Site Visits: 25 November and 3 December 2024, TerraMare Archaeology, 30 June 2025.
- **Architectural Design Guidelines,** Rev 09, 7 February 2025.
- **ECO Audit Reports:** November 2024 – March 2025, Chand, including example of e mail submission to the DEA&DP and DFFE on 24-06-2025.
- **Environmental Authorization,** Ref: (Ref: 16/3/3/1/A6/7/2046/20 issued on 20 May 2021, as amended on 6 May 2024 ref 16/3/3/5/A6/7/2020/24)
- **Environmental Management Programme,** (Amended): PROPOSED DEVELOPMENT OF RESIDENTIAL AND RECREATIONAL FACILITIES ON ERVEN 242 AND 212, BISHOPSCOURT FOR THE PROTEA VILLAGE COMMUNITY LAND CLAIM: PHASE 1, *Chand Environmental Consultants, March 2024*)
- **Environmental Method Statements:** Cement and Concrete Batching, Contaminated Water, Emergency Procedures, Fire Incidents, Fuel Storage and Use, Ground Preparation, Hazardous Substances, Tree Felling, No-Go Areas, Noise Mitigation Methods, Site Clearance, Solid Waste Management, Stormwater Management, Stormwater Ponds, Tree Protection, River Works, Site Establishment.
- **Notification of Construction Commencement,** Chand, 25 September 2024, re-submitted 4 October 2024, including:
 - Proof of Notification of I&APs of EA (25 May 2021) and Amended EA (15 May 2024) and Appointment of ECO,
 - Archaeological Monitoring Plan (TerraMare Archaeology, June 2024) and endorsement by Heritage Western Cape, 18 July 2024.
 - HWC Endorsement of Landscaping Masterplan, 18 July 2024
 - Agreement regarding the responsibilities for the management of waste, stormwater, service infrastructure, and the open space areas on both Erf 212 and Erf 242, including the associated rivers and wetlands, Protea Village, 25 September 2024.
 - Letter of support of Consolidated Landscape Master Plan Drawing no: PV-PLP-XXX-DR-LA-0001; Rev: L, City of Cape Town, 4 October 2024.

and **Acknowledgement of receipt from the DEA&DP 9 October 2024.**

- **Permitted Construction Activities in the wet season,** e-mail from consulting engineer to project team including freshwater ecologist on 8-05-2025, confirming agreements made in meeting of 7-05-2025.
- **Preliminary Services Report for the Provision of Civil and Electrical Engineering Services** for Plot 212 And 242, Bishops court: Proposed Protea Village Residential Development, Neil Lyners and Associates (Rf) (Pty) Ltd, February 2025

The Audit Checklist was completed following the site inspection, interviews, and review of documentary evidence, where compliance with each authorisation condition and EMPr requirement (as applicable to the current phase of work) was assessed and classified. Recommendations are made based on the findings of the compliance audit as well as the review of the relevance of the EMPr to the current site conditions.

3 COMPLIANCE AUDIT

3.1 Compliance Checklist: Notes and key to compliance columns:

Compliance = where a condition of the EA/EMPr has been complied with and there is no evidence of significant environmental impact or damage, or where impact was expected, that the required mitigation actions were undertaken to address such impact or damage.

N/A = Not Applicable = where a condition/requirement of the EA/EMPr is not currently applicable or auditable (reason to be motivated) e.g. due to the phase of work.

Non-Compliance = where a condition of the EA/EMPr has not been complied with. Comment will be made regarding whether there is evidence of or potential for any significant environmental impact or damage or legal liability because of the non-compliance.

Noted – where a condition of the EA/EMPr is not related to a specific action required of site management but rather a general statement.

Partial Compliance = where a condition of the EA/EMPr has been complied with for the most part but minor additional management/administration action is required and recommended to gain full compliance.

Not yet verifiable/Unverified/Partially verified = where there is no visual or documentary evidence available to verify either compliance or non-compliance.

The completed Compliance Checklist of findings follows:

3.2 Compliance Audit Findings:

ITEM	EA REF	CONDITION	COMPLIANCE	COMMENTS
A:	COMPLIANCE WITH EA CONDITIONS (2018 as amended)			
1.	E.1	The holder is authorised to undertake the listed activities specified in Section B of the EA in accordance with and restricted to the preferred alternative, described in the BAR and cover letter dated 29 January 2021 on the site as described in Section C of the EA.	COMPLIANT	No deviation from the authorised activities per section B and C of the EA was observed or reported to the auditor.
2.	E.2	Authorisation of the activities is subject to compliance with the conditions set out in this Environmental Authorisation. The holder must ensure compliance with the conditions by any person acting on his/her behalf, including an agent, sub- contractor, employee or any person rendering a service to the holder.	COMPLIANT	The holder has appointed an ECO (Chand) who is responsible for monitoring compliance with the conditions of the EA on behalf of the holder.
3.	E.3	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; and (b) A period of ten (10) years, from the date the holder commenced with an authorised listed activity, during which period the authorised listed activities for the construction phase, must be concluded.	COMPLIANT	Work commenced in October 2024, which is within 5 years of issue of EA (2021).
4.	E.4	The activities that have been authorised may only be carried out at the site described in Section C above in terms of the approved EMPr.	COMPLIANT	The activities as observed during the audit inspection were taking place on the site as described in the EA.
5.	E.5	Any changes to, or deviations from the scope of the description set out in Section B and Condition of the EA must be accepted or approved, in writing, by the competent authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the competent authority may request such information 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.	N/A	No changes/deviations to the latest authorised scope have been observed on site or reported to the auditor.

ITEM	EA REF	CONDITION	COMPLIANCE	COMMENTS
6.	E.6	The holder of the authorisation 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;6.1.3 the date of the decision; and6.1.4 the date of issue of the decision;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);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;6.4.6 the contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered I&APs in the event that an appeal is lodged in terms of the National Appeal Regulations, 2014 (as amended).	COMPLIANT	As confirmed in the Notification of I&APs of EA (25 May 2021) and Amended EA (15 May 2024), issued by Chand.
7.	E.7	The listed activities, including site preparation, must not commence within 20 (twenty) calendar days from the date the applicant notified the registered I&APs of this decision.	COMPLIANT	Construction commenced in October 2024, well outside of the appeal window (20 days after submission of notification of authorisation sent to I&AP's on 25 May 2021).
8.	E.8	In the event that an appeal is lodged with the Appeal Administrator, the effect of this Environmental Authorisation is suspended until such time as the appeal is decided. In the instance where an appeal is lodged the holder may not commence with the activity, including site preparation, until such time as the appeal has been finalised and the holder is authorised to do so.	N/A	(Confirmed compliant by DEA&DP in letter on 7-10-2024.) No appeals were lodged.
9.	E.9	A minimum of 7 (seven) calendar days' notice, in writing, must be given to the competent authority before commencement of construction activities. Commencement for the purpose of this condition includes site preparation. 9.1 The notice must make clear reference to the site details and EIA Reference number given above. 9.2 The notice must also include proof of compliance with the following conditions described herein: Conditions: 6, 7, 14, 21 and 23.3	COMPLIANT	A Notification of Commencement was submitted by Chand to the DEA&DP 25 September 2024 (resubmitted on the 04 October 2024 with additional information), within a minimum of 7 days' notice (works commenced with tree felling on 18 October 2024 according to the November 2024 ECO report), with the required (9.1) project reference number /project name provided. Proof of compliance required for EA conditions 6, 7, 14, 21 and 23.3 was included in the notification. (Confirmed compliant by DEA&DP).
10.	E.10	<i>As amended 2024:</i> The Environmental Management Programme ("EMPr") dated March 2024 (as compiled by Chand Environmental Consultants) and submitted as part of the application for amendment is hereby approved and must be implemented.	COMPLIANT	Implementation of the EMPr is monitored and reported on in the ECO reports.

ITEM	EA REF	CONDITION	COMPLIANCE	COMMENTS
11.	E.11	An application for amendment to the EMPr must be submitted to the competent authority in terms of Chapter 5 of the EIA Regulations, 2014 (as amended) if any amendments are to be made to the outcomes of the EMPr, and these may only be implemented once the amended EMPr has been authorised by the competent authority.	COMPLIANT	No further amendments have been made to the approved (by the DEA&DP) amended EMPr (March 2024).
12.	E.12	The EMPr must be included in all contract documentation for all phases of implementation.	COMPLIANT	A copy of the contents page of the contract confirms that the Construction phase EMP is included in the construction contract.
13.	E.13	A copy of the Environmental Authorisation and the EMPr must be kept at the site where the listed activities will be undertaken. Access to the site referred to in Section C above must be granted and, the Environmental Authorisation and EMPr must be produced to any authorised official representing the competent authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein. The Environmental Authorisation and EMPr must also be made available for inspection by any employee or agent of the applicant who works or undertakes work at the site.	COMPLIANT	A copy of the EA and EMPr was confirmed on file at the site office by the auditor.
14.	E.14	As amended 2024: The holder must appoint a suitably experienced Environment Control Officer ("ECO"), for the duration of the construction phase to ensure compliance with the provisions of the EMPr and the conditions contained in this Environmental Authorisation. The ECO must-14.1 be appointed prior to commencement of any construction activities commencing; 14.2 the word "should" in the EMPr, wherever it occurs, shall be deemed to imply an obligation where it is capable of such interpretation; 14.3 ensure compliance with the EMPr and the conditions contained herein; 14.4 keep record of all activities on site; problems identified; transgressions noted, and a task schedule of tasks undertaken by the ECO; 14.5 remain employed until all rehabilitation measures, as required for implementation due to construction damage, are completed; 14.6 provide the competent authority with copies of the ECO reports within 30 days of the project being finalized; and 14.7 conduct monthly site inspections during the construction phase.	COMPLIANT	<p>Chand Environmental Consultants are appointed as the project ECO and monitor compliance with the EMPr – as evidenced by the confirmation of appointment, Protea Village to the DEA&DP on 25 September 2024, and the monthly audit reports issued November 2024 – March 2025.</p> <p>Due to the sensitive nature of the works undertaken to date, and in line with the requirements of the EMPr, daily ECO inspections have been undertaken to date. There is therefore very thorough implementation of this aspect.</p> <p>Confirmed compliant by DEA&DP in letter on 7-10-2024</p>

ITEM	EA REF	CONDITION	COMPLIANCE	COMMENTS
15.	E. 15	The holder must, for the period during which the Environmental Authorisation and EMPr remain valid - 15.1 ensure that the compliance with the conditions of the Environmental Authorisation and the EMPr is audited; 15.2 submit an environmental audit report three months after commencement of the construction phase to the relevant competent authority; 15.3 submit an environmental audit report one (1) month after completion of construction activities; and 15.4 submit an environmental audit report every five (5) years while the Environmental Authorisation remains valid.	PARTIALLY COMPLIANT	<p>This first environmental audit has been undertaken in May 2025. Since construction commenced in November 2024 (with tree felling commencing in October 2024), the audit was not undertaken within 3 months of commencement, hence this is rated a partial compliance as not all aspects of this condition have been met.</p> <p>Since the audit has now been undertaken, there are no further recommendations.</p>
16.	E.16	The environmental audit reports must be prepared by an independent person and must address the objectives and contain all the information set out in Appendix 7 of the EIA Regulations, 2014 (as amended). In addition to the above, the environmental audit report, must - 16.1 provide verifiable findings, in a structured and systematic manner, on– (a) the level of compliance with the conditions of the Environmental Authorisation and the EMPr and whether this is sufficient or not; and (b) the extent to which the avoidance, management and mitigation measures provided for in the EMPr achieve the objectives and outcomes of the EMPr and highlight whether this is sufficient or not; 16.2 identify and assess any new impacts and risks as a result of undertaking the activity; 16.3 evaluate the effectiveness of the EMPr; 16.4 identify shortcomings in the EMPr; 16.5 identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr; 16.6 indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation; 16.7 include a photographic record of the site applicable to the audit; and 16.8 be informed by the ECO reports.	COMPLIANT	The audit has been undertaken by Christine Rabie, who is independent of the project team. The report meets the requirements of the regulations, as demonstrated in section 1.2.2 of this report.
17.	E.17	The holder must, within 7 days of the submission of the environmental audit report to the competent authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and, where the holder has such a facility, be placed on a publicly accessible website.	NOT YET VERIFIABLE	<p>This can only be confirmed after the submission of this audit report.</p> <p>RECOMMENDATION:</p> <p>a) It is the responsibility of the EA holder or their EAP (not the auditor) to notify all potential and registered I&APs of the submission of this audit report within 7 days of issue to the DEA&DP, make the report available to anyone on request and place on a publicly accessible website if such facility is available.</p>

ITEM	EA REF	CONDITION	COMPLIANCE	COMMENTS
18.	E.18	Surface or ground water must not be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.	COMPLIANT	No significant pollution events were recorded in the ECO reports, nor observed on site during the audit inspection.
19.	E.19	An integrated waste management approach, which is based on waste minimisation and incorporates reduction, recycling, re-use and disposal, where appropriate, must be employed. Any solid waste must be disposed of at a waste disposal facility licensed in terms of the applicable legislation.	COMPLIANT	Controlled waste management was observed on site, verified by the ECO reports and per detailed waste management disposal records verifying legal disposal on the site file.
20.	E.20	Should any heritage remains be exposed during excavations or any actions on the site, these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape (in accordance with the applicable legislation). 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 archaeological remains (including fossil bones and fossil shells); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artifacts and bone remains; structures and other built features; rock art and rock engravings; shipwrecks; and graves or unmarked human burials. A qualified archaeologist must be contracted where necessary (at the expense of the holder and in consultation with the relevant authority) to remove any human remains in accordance with the requirements of the relevant authority.	COMPLIANT	Archaeologist Gail Euston-Brown of TerraMare Archaeology undertook monitoring on site per the Heritage Western Cape approved Archaeological Monitoring Plan (TerraMare Archeology, 12 June 2024), as confirmed by the project ECO in an e-mail on 24-06-2025 and the Archaeological Monitoring Report, TerraMare, 30 June 2025. A small cluster of bottles and ceramics was found during site clearance activities. The archaeologist was called to site on 3 December 2024 to inspect the artefacts and the site where they were found and confirmed these were late 19 th to mid-20 th century and were linked to a dump site identified by Time Hart in the Heritage Impact Assessment (being more extensive than initially thought). No protection measures or reporting to the HWC was deemed required/recommended by the specialist.
21.	E.21	The following recommendations included in Heritage Western Cape's final comment dated 18 November 2020, must be implemented: 21.1 An archaeological monitoring plan must be compiled and be agreed to by the appointed archaeologist, Heritage Western Cape, the holder and the construction contractor(s). The details of the monitoring plan must be agreed with by Heritage Western Cape prior to any work commencing on site. A copy of the monitoring plan must be submitted to the competent authority for information purposes. 21.2 The Landscaping Plan, which illustrates inter alia the open public space system, tree retention and planting, integration of archaeological remains and related historic interpretation, public open access design, security systems, perimeter treatment and boundary conditions relating to the stone cottages, Kirstenbosch Drive and the riverine public open space, must be submitted to Heritage Western Cape for comment prior to the submission of any building plans to the City of Cape Town. A copy of the Landscaping Plan as approved by the City of Cape Town, must be submitted to the competent authority for information purposes.	COMPLIANT	The Archaeological Monitoring Plan (TerraMare Archaeology 12 June 2024) and the Landscape Master Plan was endorsed by the competent authority, Heritage Western Cape, in writing on 18 July 2024, prior to construction commencement. The Consolidated Landscape Master Plan Drawing no: PV-PLP-XXX-DR-LA-0001; Rev: L, was approved/supported by the City of Cape Town in writing on 4 October 2024. The plan and the confirmation were submitted to the DEA&DP as part of the Notification of Commencement on 4 October 2025. Confirmed compliant by DEA&DP in letter on 7-10-2024

ITEM	EA REF	CONDITION	COMPLIANCE	COMMENTS
22.	E.22	The holder of the Environmental Authorisation must, at all times, ensure that the activities comply with the Noise Regulations in terms of the relevant legislation.	COMPLIANT	During the audit period, no incidents of unreasonable or contravening noise disturbance were recorded by the Environmental Control Officer (ECO). While some complaints were received from neighbouring residents regarding noise from construction activities on a few Saturdays, these did not indicate exceedance of legislated noise thresholds nor any work occurring outside of permitted construction hours as defined in the applicable legislation (F.6(2) of the National Building Regulations & Building Standards Act).
23.	E.23	<p><i>As amended 2024:</i> All the recommendations provided in the Freshwater Assessment Report dated December 2019 and compiled by Freshwater Consulting cc, as included in the EMPr, must be implemented. However, the following must also be implemented:</p> <p>23.1 No well point or borehole abstraction targeting the primary (surface) aquifer may take place from either Erf 212 or Erf 242, without a signed letter from a professional, independent geohydrologist with knowledge of the area, stating that such abstraction will not affect spring water supply.</p> <p>23.2 Abstraction from surface water features, including the rivers and the spring/seep on the site, is not allowed.</p> <p>23.3 Since the City of Cape Town will own and manage the Public Open Space area, an agreement of these responsibilities, agreement or formal acknowledgement of these responsibilities must be provided. The agreement must clarify responsibility for the management of waste, storm water, service infrastructure and the open space areas on both Erf 212 and Erf 242, including the rivers and wetlands. A copy of the agreement letter or letter of acknowledgement must be submitted to the competent authority prior to the commencement of construction activities.</p> <p>23.4 As specified in the EMPr dated March 2024, copies of the agreements, determinations or plans that must be reached or made in terms of the EMPr in respect of the following aspects of the development must be provided to the competent authority and be appended to the EMPr:</p> <p>23.4.1 The management and operational maintenance of aspects of waste, storm water infrastructure, public open spaces including rivers and river bank stabilisation and wetlands;</p> <p>23.4.2 A programme/timing for the removal of the listed alien vegetation for those trees which will be removed;</p>	COMPLIANT	<p>Compliance of implementation of the EMPr requirements (which includes the recommendations provided in the Freshwater Assessment Report) is monitored and reported on by the ECO. No issues were recorded in the ECO reports, nor brought to the attention of the auditor.</p> <p>No well points or boreholes were observed or reported on site.</p> <p>No significant abstraction of water from the surface water features was reported or observed. One insignificant incident of a staff member taking water with a bucket was immediately stopped/addressed.</p> <p>Agreement regarding the responsibilities for the management of waste, stormwater, service infrastructure, and the open space areas on both Erf 212 and Erf 242, including the associated rivers and wetlands was confirmed in writing by Protea Village in a letter to DEA&DP on 25 September 2024, prior to construction commencing, as required by the condition.</p> <p>23.3 is confirmed compliant by DEA&DP in letter on 7-10-2024.</p> <p>Pre-construction and construction phase activities related to alien clearing (23.4.2) and water table monitoring (23.4.3) are scheduled per phase in table 12 of the EMPr.</p>

ITEM	EA REF	CONDITION	COMPLIANCE	COMMENTS
		<p>23.4.3 A detailed monitoring programme that allows for at least monthly measurement of the water table level in the planned storm water pond area and upslope, to the north and west in the well point area, over a period that covers both dry and wet seasons, during the detailed design phase; and</p> <p>23.4.4 The roles and responsibilities for removing listed invasive trees from the proposed public open space area and the riverine corridor included therein</p> <p>The agreements, determinations or plans referred to in Condition 23.4.1 to 23.4.4 must include, in each case:</p> <p>23.5.1 A description of the proposed impact management actions, identifying the manner in which impact management outcomes will be achieved including, where applicable, actions to avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation (as contemplated in paragraph 1(1)(f)(i) of Appendix 4 of the EIA Regulations, 2014 (as amended));</p> <p>23.5.2 The method of monitoring the implementation of the impact management actions (as per paragraph 1(1)(g) of Appendix 4 of the EIA Regulations, 2014 (as amended));</p> <p>23.5.3 The frequency of monitoring the implementation of the impact management actions (as contemplated in paragraph 1(1)(h) of Appendix 4 of the EIA Regulations, 2014 (as amended));</p> <p>23.5.4 An indication of the persons who will be responsible for the implementation of the impact management actions (as contemplated in paragraph 1(1)(i) of Appendix 4 of the EIA Regulations, 2014 (as amended));</p> <p>23.5.5 The time periods within which the impact management actions must be implemented (as contemplated in paragraph 1(1)(j) of Appendix 4 of the EIA Regulations, 2014 (as amended));</p> <p>23.5.6 The mechanism for monitoring compliance with the impact management actions (as contemplated in paragraph 1(1)(k) of Appendix 4 of the EIA Regulations, 2014 (as amended)); and</p> <p>23.5.7 A program for reporting on compliance, taking into account the requirements as prescribed by the regulations (as contemplated in paragraph 1(1)(l) of Appendix 4 of the EIA Regulations, 2014 (as amended)).</p> <p>If any of the agreements or determinations referred to in Condition 23.5 cannot be reached or made for any particular aspects, the holder remains responsible for the full implementation of all mitigation measures in respect of those aspects.</p>		<p>The Consolidated Landscape Master Plan Drawing no: PV-PLP-XXX-DR-LA-0001; Rev: L of October 2024, as approved by the City of Cape Town, indicates specific areas of responsibility for implementation and maintenance work related to the POS area.</p> <p>The letter of agreement regarding the responsibilities for the management of waste, stormwater, service infrastructure, and the open space areas on both Erf 212 and Erf 242 by Protea Village in their letter of 25 September 2024 confirms that the responsibility remains that of the holder where no alternative agreements or determinations have been made.</p>

ITEM	EA REF	CONDITION	COMPLIANCE	COMMENTS
24.	E.24	<p>Water saving mechanisms and/or water recycling systems must be installed in order to reduce water consumption that include inter alia, the following:</p> <p>24.1 Dual-flush toilet systems.</p> <p>24.2 All taps must be fitted with water saving devices, that is, tap aerators, flow restrictors and low flow shower heads.</p> <p>24.3 Water-wise landscaping must be done.</p>	NOT YET VERIFIABLE	<p>Not verifiable at this stage as this infrastructure is yet to be built on-site.</p> <p>Refer also to EMPr audit item 5.</p>
25.	E.25	<p>The development must incorporate energy/electricity saving measures, which include inter alia, the following:</p> <p>25.1 Use of energy efficient lamps and light fittings. Low energy bulbs must be installed, and replacement bulbs must also be of the low energy consumption type.</p> <p>25.2 Street lighting must be kept to a minimum and down lighting must be used to minimize light impacts. Streetlights must be switched off during the day.</p> <p>25.3 All geysers must be covered with geyser "blankets".</p> <p>25.4 The installation of solar water heaters and solar panels must be considered for all buildings.</p>	NOT YET VERIFIABLE	<p>Not verifiable at this stage as this infrastructure is yet to be built on-site.</p> <p>Refer also to EMPr audit item 3.</p>
26.	E.26	The requirements of the Occupational Health and Safety Act, 1993 (Act No. 85 of 1993), must be adhered to.	COMPLIANT	The client has appointed a Health & Safety (H&S) Agent , Ransom Safety Consultants, to monitor compliance with the requirements of the Act. Furthermore, a H&S officer (Johan Lubbe) has been appointed by the principal contractor Groeneveld Civils to monitor compliance on site daily.

B:	COMPLIANCE WITH THE EMPr: Important note: This audit report comments principally on compliance with the EMPr <u>outcomes</u> relevant to scope of work undertaken during the audit period. Where the auditor has identified an issue with the implementation of a specific management action, this will be recorded in the comments section alongside the related outcome.				
ITEM	EMPR REF	EMPR OUTCOME	COMPLIANCE	COMMENTS	
B.1: PRE- CONSTRUCTION DESIGN & PLANNING PHASE					
1.	Procedural Requirements	Development of documents aligned with the Settlement Agreement and planning recommendations of the planning specifications in the EMPr. <ul style="list-style-type: none">Stormwater management planLandscape master planTree protection planArchitectural guidelinesCCT approved SDPAgreement on responsibilities regarding operational management requirements for aspects such as stormwater infrastructure, Public Open Spaces including rivers and wetlands.Programme/timing/responsibilities for the removal of the listed alien vegetationWater table monitoring in design phase	COMPLIANT	<ul style="list-style-type: none">The documents are in place and informed by the requirements. <p>(ref: Architectural Design Guidelines, Rev 09, 7 February 2025; Agreement regarding the responsibilities for the management of waste, stormwater, service infrastructure, and the open space areas on both Erf 212 and Erf 242, , Protea Village, 25 September 2024; Consolidated Landscape Master Plan Drawing no: PV-PLP-XXX-DR-LA-0001; Rev: L; Preliminary Services Report for the Provision of Civil and Electrical Engineering Services, Neil Lyners and Associates (Rf) (Pty) Ltd, February 2025).</p>	
2.	Freshwater Systems	No development beyond development footprint (noting that the footprint includes the stormwater attenuation ponds and outlets) boundary. Effective control of surface water with no pooling or flooding occurring on site or off-site as a result of activities on site. No contamination of wetlands and riverine areas (including river) in the proposed Public Open Space area with untreated stormwater. No erosion and sedimentation in the river system as a result of the proposed development. Sustained on-site water quality throughout the life of the proposed development. Post-development stormwater run-off to be comparable to pre-development run-off peak flows from the site. <ul style="list-style-type: none">Servitudes registeredCEMP compiledSetback/buffers adjacent to rivers and wetlandsRiverbank stabilisationExpansion of pond to create wetland areaLandscaping measures	COMPLIANT	<ul style="list-style-type: none">Work commenced on the freshwater features on site in the dry season (staring November 2024). This has not been completed, and the final design cannot be verified as built on site yet. However, freshwater design requirements are included in the final approved consolidated landscape master plan including setback/buffers adjacent to the river and wetland areas, riverbank stabilisation (gabions), expansion of the ponds to create wetlands and stormwater management features (ponds and landscaped swales). <p>RECOMMENDATION:</p> <p>b) The consulting freshwater ecologist (Liz Day), as the external technical specialist, should provide written confirmation of correct implementation of freshwater ecology design imperatives, after completion of construction and rehabilitation work on site. This should form part of the post construction audit report.</p>	

		<ul style="list-style-type: none"> Stormwater management planning Design (architectural) Water table monitoring 		
3.	Energy Saving	Sound design which incorporates as many energy saving measures as is possible and practical, to be included in Architectural Design Guidelines.	PARTIALLY COMPLIANT	<ul style="list-style-type: none"> Section 3.11.3 of the Architectural Design Guidelines encourages omission of unnecessary external light fittings, use of proximity switching and use of lower output lamps. Section 3.12.1 states "Energy saving methods are encouraged [All green building methods to be scrutinized individually and indicated on a plan]. Guidelines are provided for incorporating solar PV into the building design. There is no mandatory requirement for geyser blankets or energy efficient lighting, as required by EA condition E.25, in the Architectural Design Guidelines. <p>RECOMMENDATION:</p> <p>c) Include the required home energy saving measures into the architectural design guidelines, or other documentation as appropriate to ensure these get implemented.</p>
4.	Provision of services	<p>Administrative success in the connection of electrical, water and sewer supply, as well as provision of refuse (i.e., all aspects in terms of detailed planning and engagement with the City of Cape Town such that the site would be serviced must be achieved)</p> <ul style="list-style-type: none"> Per civil engineering design standards Pedestrian and cycle way Internal road infrastructure Water Sewage Telecommunications Electrical Refuse 	COMPLIANT	<ul style="list-style-type: none"> This forms part of the approved plans which are currently being implemented on site. Additional reference: Preliminary Services Report for the Provision of Civil and Electrical Engineering Services, Neil Lyners and Associates (Rf) (Pty) Ltd, February 2025
5.	Water Saving	Sound design which incorporates as many water saving measures as is possible and practical, to be included in Architectural Design Guidelines.	PARTIALLY COMPLIANT	<ul style="list-style-type: none"> Section 5.1.2 of the Architectural Design Guidelines encourages water wise locally indigenous planting. Re-use of grey water as well as rainwater harvesting for irrigation is encouraged in sections 5.6.3 and 5.6.4.

				<ul style="list-style-type: none"> There is no mandatory requirement for water saving toilet systems and taps as required by EA condition E.24, in the Architectural Design Guidelines. <p>RECOMMENDATION: d) Include the required home water saving measures into the architectural design guidelines, or other documentation as appropriate to ensure these get implemented.</p>
6.	Resources/Materials Saving	Sound design which incorporates as many resource- and materials-saving measures as is possible and practical, to be included in Architectural Design Guidelines.	PARTIALLY COMPLIANT	<ul style="list-style-type: none"> While some materials choices, such as locally sourced rock, are specified in the Architectural Design Guidelines, no overt resource- and materials-saving measures are incorporated. <p>RECOMMENDATION: e) Include practical resource and materials saving measures into the architectural design guidelines, or other documentation as appropriate to ensure that this EMPr requirement is implemented.</p>
7.	Landscaping	<p>A landscaping plan which is approved by the relevant authorities that is appropriate for the natural environmental context as well as the social and historical context of the site</p> <ul style="list-style-type: none"> Landscape plan with required details Tree protection and removal plan Roles and responsibilities for AIS removal NMT path 	COMPLIANT	<ul style="list-style-type: none"> The Consolidated Landscape Master Plan Drawing no: PV-PLP-XXX-DR-LA-0001; Rev: L of October 2024, containing the required information has been approved by the City of Cape Town (letter dated 4 October 2024)
8.	Design/ sense of place/ cultural landscape	<p>Architectural Design Guidelines which adhere to the requirements of the specialists and development of structures aligned with the Architectural Design Guidelines</p> <ul style="list-style-type: none"> Layout and design Landscaping Stormwater management system 	COMPLIANT	<ul style="list-style-type: none"> Architectural Design Guidelines (Revision 9, 7 February 2025) have been produced to guide design and sense of place and these address layout, design, landscaping and stormwater management pertaining to residences on site.

9.	Sub-surface/ founding conditions	<p>No flooding in homes and no collapsing structures through subsidence, damming, or unstable wet soils</p> <ul style="list-style-type: none"> • Ground/ bulk earthworks planning and preparation • Design • Stormwater management systems • Landscaping 	COMPLIANT	<ul style="list-style-type: none"> • Stormwater management systems design incorporated into the approved engineering plans, landscape master plan and the Architectural Design Guidelines (section 3.12.3). • Section 2.8 of the Architectural Design Guidelines proposes raft foundations as well as houses following natural terrain to avoid cut and fill work to help minimize soil excavation and disturbance of the water table on site.
10.	Loss of fauna and restriction of movement of fauna	<p>Persistence of fauna on site (i.e., continued evidence of faunal activity on site)</p> <ul style="list-style-type: none"> • Layout and design • Landscaping 	COMPLIANT	<ul style="list-style-type: none"> • Significant retention of mature trees and the large POS area including freshwater ecosystems in the design ensures significant faunal habitat is retained on site. Planned landscape rehabilitation including removal of alien vegetation, increasing local flora and improving the freshwater elements should improve the habitat quality.

ITEM	EMPR REF	EMPR OUTCOME	COMPLIANCE	COMMENTS
B2: CONSTRUCTION EMPr				
1.	3.1 -3.9; 3.11 ADMINISTRATION	Administrative requirements of the EMPr are met <ul style="list-style-type: none"> • Roles and responsibilities • Monitoring and reporting • Record keeping • Environmental education • Dispute resolution • Method Statements • Penalties and bonuses 	COMPLIANT	<ul style="list-style-type: none"> • An ECO is appointed and on average daily visits have been undertaken during the construction phase to date. The principal contractor, Groeneveld Civils also has a permanent environmental officer based on site. Therefore, monitoring of EMPr implementation is comprehensive. • The appointed Environmental Control Officer (ECO) has submitted detailed monthly ECO reports throughout the construction period, demonstrating continuity of site monitoring. While the reports include photographic evidence and discuss key environmental issues well, they do not include a checklist linked to specific EMPr impact management outcomes or Environmental Authorisation (EA) conditions which makes it difficult to quickly identify non-compliances and priority risks or track levels of compliance. • Record keeping is up to date on the environmental site file at the site office and completed induction registers are evidence that environmental education is undertaken. Required method statements are on file. Penalties have been applied where necessary as evidenced by the ECO reports and penalty recommendation letter viewed by the auditor. <p><u>RECOMMENDATION</u></p> <p>f) Consider strengthening ECO reporting by integrating a tabulated compliance audit checklist which explicitly references EA/EMPr Key Performance Indicators (KPI's) or adding a non-compliance summary register/table with status updates on close out of issues. This will be helpful for project management, the authorities and for audit purposes to get a sense of the level of compliance of the project at a point in time and over time.</p>

ITEM	EMPR REF	EMPR OUTCOME	COMPLIANCE	COMMENTS
2.	3.10 GROUND PREPARATION/ SITE CLEARANCE	<p>No subsidence of collapse of structures as a result of poor founding and record of permits for removal/cutting of Protected Tree/s. No damage to sensitive areas of the site.</p> <ul style="list-style-type: none"> • Demarcation of No-Go Areas and Riverbank Stabilisation • Protection of Flora • General requirements • Trenching • Tree removal • Management of fauna • Community Relations • Site camp 	COMPLIANT	<ul style="list-style-type: none"> • Demarcation and protection of no-go areas and associated flora with shade cloth fencing and silt screening was noted to be well implemented on site – refer to photo sheet. • No over clearing of vegetation was observed or reported. • Plant search and rescue as required by the EMPr was reported undertaken by specialist horticultural contractor, Vula Environmental in June and November 2024. • No issues were recorded regarding trenching. • See audit item 12 regarding Tree removal / protection. • No landscaping, including topsoil placement has taken place. • No issues relating to subsistence/collapse of structures or related to trenching have been observed or reported. Where required the ECO recommended measures to ensure escape from open trenches by small wildlife is possible. • No alien and invasive plant species control has been undertaken within the open space area yet – this is scheduled for after the wet season. • A Community Liaison Officer (CLO - Lucy Bekker) has been appointed to liaise with the community including the Fernwood Residents Association to keep them informed on work taking place e.g. tree felling near to residences. The ECO reports that the CLO informs residents of the work schedule and the Contractors send an email to the project team a day or two beforehand to keep them informed as well. Where necessary a newsletter has been circulated. • The site camp is in a non-sensitive area per EMPr requirements.
3.	3.10 WASTE MANAGEMENT	<p>No non-conformances and no pollution of soil, groundwater, wetlands and/or stormwater as a result of waste generation and management activities and no litter to be present on site or the general area as a result of construction activities</p> <ul style="list-style-type: none"> • General • Storage, handling, and disposal of general waste • Litter prevention and housekeeping • Storage, handling, and disposal of hazardous waste • Storage, handling, and disposal of builders' rubble 	COMPLIANT	<ul style="list-style-type: none"> • A designated and well controlled waste management area is established on site, with separate storage for different waste streams as appropriate. Per the ECO reports, the few waste storage issues noted were quickly rectified on site, and overall, compliance was to standard. • An updated waste disposal register was observed in the site file. Waste was taken to the principal contractor's yard for further sorting and disposal. • Housekeeping was noted to be satisfactory, and no significant litter was observed on site.

ITEM	EMPR REF	EMPR OUTCOME	COMPLIANCE	COMMENTS
4.	3.10 POLLUTION & SEDIMENTATION PREVENTION – for SOIL, GROUNDWATER, STORMWATER AND THE RIVER AND WETLANDS ON SITE	<p>No non-conformances no evidence of erosion and no pollution of soil, groundwater and/or stormwater or any water courses as a result of the construction activities</p> <ul style="list-style-type: none"> • Timing of Construction Activities, including installation of stormwater management system, limitation of works areas for certain seasons/ periods within the year • Prevention of soil and water pollution • Execution of Riverbank Stabilisation/ Rehabilitation Work • Spills and spill control • Sedimentation control and protection of stormwater system • Monitoring 	COMPLIANT	<ul style="list-style-type: none"> • Work on the stormwater system and critical water course rehabilitation work to address erosion risks e.g. stabilisation of the river and stream banks with gabions and the excavation and shaping of soils for the construction of the stormwater management ponds on the western end of erf 212 commenced with the onset of the dry season (November 2024) in line with the phasing requirements of the EMPr. The work was well advanced but was continuing outside of the dry season (post 30 April). The team consulted with freshwater ecologist Liz day on site on 7 May and obtained advice on permitted construction/methods (confirmed in an e mail from the engineer to Liz day on 8 May). If the agreements with the specialist are honoured, the work is deemed compliant. • Measures were in place to dewater construction areas and receive and settle sediment rich water. No incidents of contaminated water directed to the river or other water course were observed on site or reported by the ECO. • No significant soil or water pollution incidents/spills were recorded. Minor concrete spills were recorded in the ECO reports and addressed and are unlikely to be the cause of significant negative environmental impact. Good use of drip trays to prevent hydrocarbon spills on site was observed. A spill kit is available on site (see photo sheet). • Riverbank stabilisation work e.g. gabion installation was far advanced (refer too photo sheet). • No unauthorised access for machine work into water courses was reported and no significant issues related to storage of materials in the water course beyond what was immediately in use in that area was observed. • Silt screen/haybales are in place in key locations around the central open space seep/wetland area. • No significant construction related erosion issues were recorded. Some localised riverbank erosion due to moving gabion rock down to the work area was noted in the ECO report but since addressed. • No significant sedimentation of the stormwater drains close to the site was observed or reported. Roads were clean near to the site entry points.

ITEM	EMPR REF	EMPR OUTCOME	COMPLIANCE	COMMENTS
				<ul style="list-style-type: none"> Water Monitoring is undertaken per the requirements of the Water Use Licence (audited separately). Daily photographs are taken by the Contractor's EO when work occurs in the water courses on site and submitted to the ECO for the records.
5.	3.10 PROTECTION OF PALEONTOLOGICAL AND ARCHAEOLOGICAL RESOURCES	<p>No non-conformances and no impacts on such resources</p>	COMPLIANT	<ul style="list-style-type: none"> An archaeologist was appointed to monitor excavation work on site as required by the EMPr. Nothing significant was found on site. The correct procedure was followed when a few glass bottles and ceramics were unearthed on site – the archaeologist was consulted who confirmed the finding was not of heritage significance/reportable.
6.	3.10 NOISE MANAGEMENT	<p>No disruptions or nuisance to adjacent communities caused by noise from the construction site. Effective complaints handling. No repeat complaints received</p> <ul style="list-style-type: none"> Management of potential noise disturbance 	COMPLIANT	<ul style="list-style-type: none"> During the audit period, no incidents of unreasonable or contravening noise disturbance were recorded by the Environmental Control Officer (ECO). While some complaints were received from neighbouring residents regarding noise from construction activities on a few Saturdays, these did not indicate exceedance of legislated noise thresholds nor any work occurring outside of permitted construction hours as defined in the applicable legislation (F.6(2) of the National Building Regulations & Building Standards Act).
7.	3.10 DUST MANAGEMENT	<p>No disruptions to traffic, no nuisance to adjacent communities/surrounding land users caused by dust. Effective complaints handling. No repeat complaints received.</p> <ul style="list-style-type: none"> Prevention of dust nuisance 	COMPLIANT	<ul style="list-style-type: none"> No issues pertaining to dust management were observed during the audit inspection. Some incidents of localized dust were noted on the site itself in the ECO reports, but no negative impact on adjacent traffic or residents was reported and no dust complaints were reported in the complaints register. A water truck / trailer was available on site to manage dust. Water from site dewatering was used for dust control i.e. non potable water. Dust (shade cloth) screening is in place on the site boundaries adjacent to Kirstenbosch Drive and Winchester Avenue. Kirstenbosch Drive and Winchester Avenue were clean, free of potentially dust causing debris.

ITEM	EMPR REF	EMPR OUTCOME	COMPLIANCE	COMMENTS
8.	3.10 AESTHETICS (VISUAL)	<p>No unacceptable visual impacts occur, the site is kept tidy, and the plans are approved by an independent architect and the local authorities.</p> <ul style="list-style-type: none"> Site Housekeeping 	COMPLIANT	<ul style="list-style-type: none"> No unacceptable visual impacts were recorded. The site was well screened with dark green shade cloth lined fencing. Housekeeping was of adequate standard. The site camp and waste management area were neat and tidy and well positioned. Many mature trees are retained on site per the landscape plan. Motion activated night lighting only.
9.	3.10 SITE ACCESS, ACCESS ROUTES AND TRAFFIC MANAGEMENT	<p>No long disruptions to traffic, no damage to vehicles and related claims and no nuisance to land users in the area</p>	COMPLIANT	<ul style="list-style-type: none"> The site is accessed controlled; required boundary fencing and no entry signage is in place. No disruptive parking was observed. Traffic control with flagmen is in place as required. Roads were observed to be clean, free of construction debris. Kirstenbosch Drive had to be temporarily closed for a short period in March 2025 to excavate a portion of the road to install the stormwater pipe. The ECO reported that this made road users unhappy, but this closure was unavoidable and completed as quickly as possible- therefore this audit item is still marked compliant.
10.	3.10 LABOUR RELATIONS AND FACILITIES AND SITE HEALTH AND SAFETY	<p>No injuries / incidents on site and emergency situations managed effectively. No safety breaches.</p> <ul style="list-style-type: none"> General safety General site security Ablution facilities Eating Areas Drinking Water Working Hours Employment Policy Community Relations 	COMPLIANT	<ul style="list-style-type: none"> The client has appointed a Health & Safety (H&S) Agent, Ransom Safety Consultants, to monitor compliance with the requirements of the Act. Furthermore, a H&S officer (Johan Lubbe) has been appointed by the principal contractor Groeneveld Civils to monitor compliance on site daily. Health, safety and environmental inductions are undertaken with staff – as evidenced by the attendance registers on file. The work site is secured – fenced and access points are gated. No personnel live on site. Adequate and secured toilet facilities were noted on site in permitted locations. The ECO reports indicated a few occasions early in the construction phase where toilets were not secured but the issues were addressed. No spills/hygiene issues were recorded. Eating area and drinking water is provided. Environmental Information posters and ECO contact details are posted at the site camp. No exceedance of permitted working hours was reported.

ITEM	EMPR REF	EMPR OUTCOME	COMPLIANCE	COMMENTS
11.	3.10 INCIDENT MANAGEMENT	<p>No non-conformances and no adverse impacts on the environment as a result of emergency situations and/or environmental incidents. No fires started on the site.</p> <ul style="list-style-type: none"> Prevention of fires Accidental Leaks and Spillages 	COMPLIANT	<ul style="list-style-type: none"> No emergencies or significant incidents related to spills, pollution, fires or water courses were reported. An incident register is maintained and includes the required details of the incident and actions taken to rectify. Fire extinguishers and no smoking/flammables signage was observed on site. A spill kit is available on site (confirmed in ECO reports).
12.	3.10 PROTECTION OF TREES REMAINING ON SITE	<p>Record of permits for removal/cutting of Protected Tree/s and no loss of- or significant damage to- trees which would remain.</p> <ul style="list-style-type: none"> Tree Removal/protection in line with the Tree Protection Plan 	PARTIALLY COMPLIANT	<ul style="list-style-type: none"> No felling or pruning of protected tree species (requiring a permit) has observed or been reported – this includes the Outeniqua Yellowwood on Erf 242 referred to in the EMPr as well as additional yellowwoods identified on site. These have been demarcated or are in no-go areas and remain undisturbed. Trees on site have been surveyed (and peer reviewed) and are indicated on the landscape master plan under various categories, namely: to be removed, protected tree species, trees to be retained and trees that can remain or be removed. At the time of the audit inspection the trees identified for removal had been felled (by specialist contractor Stodart). Trees to be felled were specifically marked on site (with red paint) to ensure that only trees authorised for removal were felled. Retained trees requiring protection within the development area are demarcated with no-go shade cloth lined fencing – the majority of which are located on erf 242. Trees designated for either removal or retention have not been demarcated with fencing, neither is this specifically required by the EMPr, <u>however the auditor believes that more care should be taken to protect those trees e.g. avoid stockpiling around the base of the trees to avoid compaction damage ensure that they would still be viable if chosen to be retained.</u> For example, soil was noted stockpiled around the base of unfenced trees on erf 242 (since removed) and kerbs around the base of some trees on erf 212 – refer to the photo sheet. The use of a monitor guiding machines/vehicle movement near protected trees to prevent damage (per method statement) is commended. A few incidents of fairly minor/localised damage to tree limbs or trunks due to contact with a machine/vehicle were reported

ITEM	EMPR REF	EMPR OUTCOME	COMPLIANCE	COMMENTS
				<p>by the ECO despite the planned precautions but the appropriate actions were taken e.g. pruning by the specialist contractor, and/or issue of a penalty to the contractor and no outstanding actions are noted.</p> <ul style="list-style-type: none"> Because of the incidents recorded, including attracting a penalty recommendation, a partial compliance is indicated for this audit period. <p>RECOMMENDATION:</p> <p>g) Protect trees that are listed with a possibility of either retention or removal as much as practically possible e.g. do not store heavy or dense materials around the base of the trees and limit principal access routes used on site.</p>
13.	3.10 PROTECTION OF FAUNA	No death of any animals on the site or as a result of actions of removing fauna off site.	PARTIALLY COMPLIANT	<ul style="list-style-type: none"> Snake information posters are displayed at the site camp. A snake and two Cape Rain Frogs were reported safety relocated from the working area (ref. ECO reports). In November 2024, the ECO report documented that two owlets were discovered near a felled tree by a local community member who reportedly proceeded to collect the owlets and transport them offsite. Inspection of trees before and during felling is a project requirement and while the tree felling team had reported that this was done, the owlets were missed. The ECO investigated the incident and issued a penalty in response (ref Penalty letter, Chand, 5 November 2024) and the December 2024 report stated that further tree felling was well inspected. An incident was recorded of 5 small fish that died in a trench connected to one of the ponds that dried up. The other 7 fish were rescued and relocated back to the pond and the trench was closed to prevent further incident. The issues have been closed out and there are no further recommendations.
14.	3.10 LIMITATION OF RESOURCE USE	<p>Development of an attitude towards a reduction in natural resources consumption where feasible and possible, with evidence for where this has been successful</p> <ul style="list-style-type: none"> Limit use of natural resources 	COMPLIANT	<ul style="list-style-type: none"> No issues pertaining to wastage of water or construction materials were recorded. The reuse of site drainage water for dust control is commended.

ITEM	EMPR REF	EMPR OUTCOME	COMPLIANCE	COMMENTS
15.	3.10 SITE CLEAN-UP AND REHABILITATION	<p>No construction materials or rubble on site and planted landscaping for any given section/phase as per the approved Landscape Masterplan</p> <ul style="list-style-type: none"> • Landscaping • Expansion of ponds to create wetlands 	NOT YET APPLICABLE	<ul style="list-style-type: none"> • Construction is still very much in progress and no landscape planting work has commenced yet.

4 EMPr REVIEW

4.1 Scope of the EMPr review

This EMPr review is restricted to the section relevant to this audit scope, namely the pre-construction and construction phase of the EMPr.

4.2 Relevance/shortcomings of the EMPr and recommendations for amendment

No unforeseen activities/situations/risks were identified that were not adequately covered by the EMPr and the ECO confirms that the specifications were sufficient to manage the impacts/risks during the construction of this project. No amendments to the presented Outcomes of the EMPr are recommended by the auditor, nor were these suggested by the project ECO.

A few of the Management Actions should however in the auditor's opinion be reviewed as follows:

I. ECO monitoring and reporting, EMPr section 3.3 page 110

- The EMPr requires that unless otherwise deemed appropriate by the ECO, Engineer, Applicant or environmental authorities, fortnightly site inspections must be undertaken to monitor compliance with the EMPr. Thereafter it stipulates scenarios where more frequent ECO inspections should be undertaken. While the motivation for more frequent ECO inspections during sensitive work on site is sound, some of the listed scenarios have effectively triggered daily ECO inspections for the entire construction period to date, not all meriting that level of monitoring. In addition to a permanent environmental officer on site for the principal Contractor, who in the first instance should be responsible for daily oversight on site, this is seen as overly onerous and unnecessary – the ECO agrees with this assessment. Specifically, the requirement to undertake daily site inspections during activities requiring dewatering on 212 (especially since the water has been captured and reused on site and not directed into a water course), excavation within 30m of the buffer area (when the buffer area is fenced and is there to protect the sensitive feature) are questioned, and the construction activities involving disturbance of potentially wetted / saturated near-surface soils on Erf 212 (not likely a concern outside a water course and associated buffer area unless there is a pollution incident, noting that the inspection frequency is increased to weekly for work in June-August on erf 212).
- The reporting, and specifically the submission requirement of ECO reports of the EMPr is confusing as several inspections are required dependant on the activities taking place on site. It stipulates that checklists from the "additional audits" listed on page 110 (which lists several daily inspection scenarios) must be submitted to the CCT and DEA&DP within a week of each inspection being completed, but monthly monitoring reports (page 111) must be submitted to these authorities if necessary. Daily reports to the authorities are outside the standard of practice and unlikely to be of value unless there is an environmental emergency on site, while the submission of a monthly summary report by the ECO, highlighting the level of compliance and key issues, to the authorities would be standard practice and of value.

RECOMMENDATION:

h) Amend the management actions related to ECO inspection and reporting as follows:

- Remove the requirement for daily site inspections by the ECO during the construction activities involving disturbance of potentially wetted / saturated near-surface soils on Erf 212 (unless within a water course or associated buffer area), dewatering on erf 212 (unless water is being pumped into a water course or wetland) and within 30 meters of the buffer area (excluding work within the river corridor and wetland and associated buffer area itself).

- Remove this requirement on page 110 "The audit checklists for the above additional audits are to be provided to the DEA&DP as well as the City of Cape Town Environmental Management branch within one week of each site inspection having been completed."
- Amend paragraph 1 on page 111 to remove "and if it is deemed necessary" to make submission of the monthly ECO compliance summary reports to the DEA&DP and the CCT mandatory rather than optional.

5 CONCLUSIONS & SUMMARY OF RECOMMENDATIONS

This construction phase audit of the EA/EMPr conditions recorded compliance issues for **1 EA condition** (due to undertaking this audit outside of the stipulated time frame), **3 requirements of the of the Design/Planning phase section of EMPr** (due to not all the energy, water and resource saving measures stipulated in the EA and EMPr being captured in the Architectural Design Guidelines) and **2 requirements of the construction phase section of the EMPr** (related to incidents of tree and wildlife protection. The efforts of the project owner, contractor and ECO are acknowledged in this regard.

The following recommendations were made in response to the audit findings:

- It is the responsibility of the EA holder or their EAP (not the auditor) to notify all potential and registered I&APs of the submission of this audit report within 7 days of issue to the DEA&DP, make the report available to anyone on request and place on a publicly accessible website if such facility is available.
- The consulting freshwater ecologist (Liz Day), as the external technical specialist, should provide written confirmation of correct implementation of freshwater ecology design imperatives, after completion of construction and rehabilitation work on site. This should form part of the post construction audit report.
- Include the required home energy saving measures into the architectural design guidelines, or other documentation as appropriate to ensure these get implemented.
- Include the required home water saving measures into the architectural design guidelines, or other documentation as appropriate to ensure these get implemented.
- Include practical resource and materials saving measures into the architectural design guidelines, or other documentation as appropriate to ensure that this EMPr requirement is implemented.
- Consider strengthening ECO reporting by integrating a tabulated compliance audit checklist which explicitly references EA/EMPr Key Performance Indicators (KPI's) or adding a non-compliance summary register/table with status updates on close out of issues. This will be helpful for project management, the authorities and for audit purposes to get a sense of the level of compliance of the project at a point in time and over time.
- Protect trees that are listed with a possibility of either retention or removal as much as practically possible e.g. do not store heavy or dense materials around the base of the trees and limit principal access routes used on site.

- h) Amend the management actions related to ECO inspection and reporting as follows:
- Remove the requirement for daily site inspections by the ECO during the construction activities involving disturbance of potentially wetted / saturated near-surface soils on Erf 212 (unless within a water course or associated buffer area), dewatering on erf 212 (unless water is being pumped into a water course or wetland) and within 30 meters of the buffer area (excluding work within the river corridor and wetland and associated buffer area itself).
 - Remove this requirement on page 110 "The audit checklists for the above additional audits are to be provided to the DEA&DP as well as the City of Cape Town Environmental Management branch within one week of each site inspection having been completed."
 - Amend paragraph 1 on page 111 to remove "and if it is deemed necessary" to make submission of the monthly ECO compliance summary reports to the DEA&DP and the CCT mandatory rather than optional.

6 DECLARATIONS & CREDENTIALS OF THE INDEPENDENT AUDITOR

The auditor, as undersigned, declares their independence and expertise to undertake this audit and that every effort was made to conduct this audit in a thorough, professional, objective and fair manner.



Signed by **Christine M.M Rabie** on **8 July 2025**

- B.Tech Environmental Management; ND Landscape Technology
- Professional Natural Scientist certified by the South African Council for Natural Scientific Professions in the field of Environmental Science – Reg. No. 400055/17
- 20+ years of directly applicable EA and EMPr environmental compliance auditing experience.

7 APPENDICES:

7.1 AUDIT PHOTO SHEET (photos taken on 7 May 2025)



PHOTO 1: Site boundary demarcation adjacent to Winchester Road



PHOTO 2: Site boundary demarcation adjacent to Kirstenbosch Drive



PHOTO 3: No-go area demarcation of the POS



PHOTO 4: No-go area demarcation of the POS and no entry/protected area signage



PHOTO 5: No-go area demarcation of the POS and hay bale sediment trapping is evident



PHOTO 6: Hay bales for sediment trapping along the water course



PHOTO 7: Yellow wood tree protected by fencing



PHOTO 8: New gabions and hay bale sediment trapping on the edge of the water course



PHOTO 9: New gabions and hay bale sediment trapping on the edge of the water course



PHOTO 10: New gabions and hay bale sediment trapping on the edge of the water course



PHOTO 11: Riverbank stabilisation work in progress



PHOTO 12: Riverbank stabilisation work – gabions completed



PHOTO 13: Stormwater ponds being built



PHOTO 14: Stormwater ponds being built



PHOTO 15: Tree protection fencing erf 242



PHOTO 16: Soil stockpiling around tree base erf 242



PHOTO 17: Tree protection fencing erf 242



PHOTO 18: Tree protection fencing erf 242



PHOTO 19: Tree protection fencing erf 212



PHOTO 20: Unavoidable traffic near to an old oak tree due to deep service installation



PHOTO 21: Kerb stockpiling around tree base erf 212



PHOTO 22: Good use of drip tray



PHOTO 23: Good use of drip tray



PHOTO 24: Good use of drip tray and spill kit on site



PHOTO 25: Good use of drip tray



PHOTO 26: Fire safety signage



PHOTO 27: Good sump for concrete mixer effluent



PHOTO 28: Toilets at the site camp



PHOTO 29: Toilets are provided at working areas



PHOTO 30 Good waste management area



PHOTO 31: Clean site access Kirstenbosch Drive



PHOTO 32: Cycle track being constructed by the City of Cape Town between site and Kirstenbosch Drive



PHOTO 33: Road cleaning Kirstenbosch Drive



PHOTO 34: Environmental information posters on site

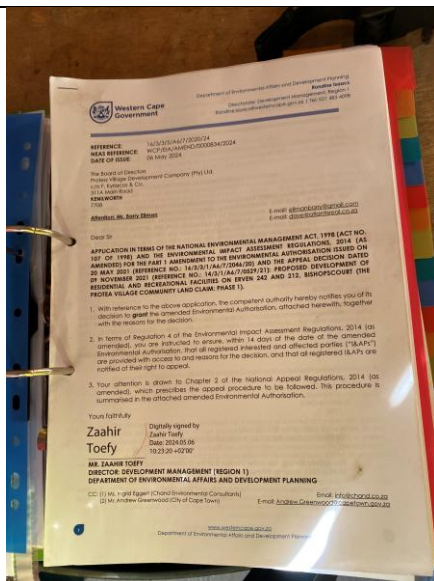


PHOTO 35: EA on site file

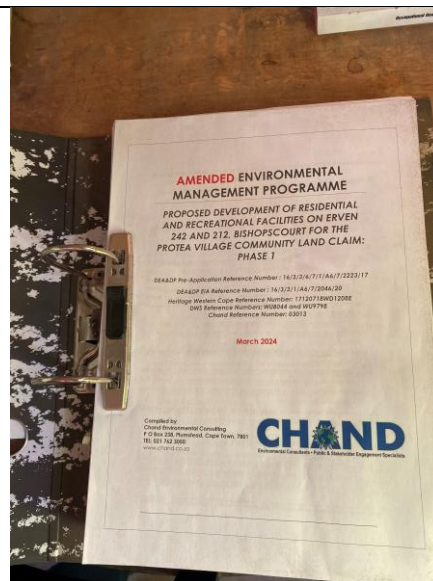


PHOTO 36: EMPr on site file