



ENVIRONMENTAL AUDIT REPORT

FOR

GLENVILLAGE COUNTRY ESTATE AND ASSOCIATED INFRASTRUCTURE ON PORTION 52 OF FARM 195 KRAAIBOSCH, GEORGE



PREPARED FOR: Bluerain Property Group Pty Ltd
PREPARED BY: Eco Route Environmental Practitioners
DEPARTMENT REF: 16/3/1/1/D2/19-0025/12
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DATE: 2024/08/26
SUBMITTED TO: DEA&DP, George Municipality, Sharples Environmental Services cc (SES), Glen Haven Country Estate (Pty) Ltd., and BA Developments (Pty) Ltd.

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STATEMENT OF INDEPENDENCE

I, **Joclyn Marshall**, of Eco Route Environmental Consultancy, in terms of section 33 of the NEMA, 1998 (Act No. 107 of 1998), as amended, hereby declare that I provide services as an independent Environmental Assessment Practitioner (EAPASA Reg: **2022/5006**) and receive remuneration for services rendered for undertaking tasks required in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), and the Environmental Impact Assessment Regulations, 2014 (as amended). I have no financial or other vested interest in the project.

EAP SIGNATURE: _____

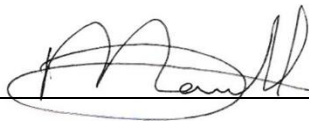


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CONTENT OF AN ENVIRONMENTAL REPORT

Appendix 7 of the amended Environmental Impact Assessment Regulations, 2014, published under Government Notice No. 982 in Gazette No. 3822 of 4 December 2014, in terms of sections 24(5) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) contains the required contents of an Environmental Audit Report.

The following table serves as a checklist indicating how the requirements were incorporated throughout this Audit Report.

Table 1: Checklist on the content of an Environmental Audit Report

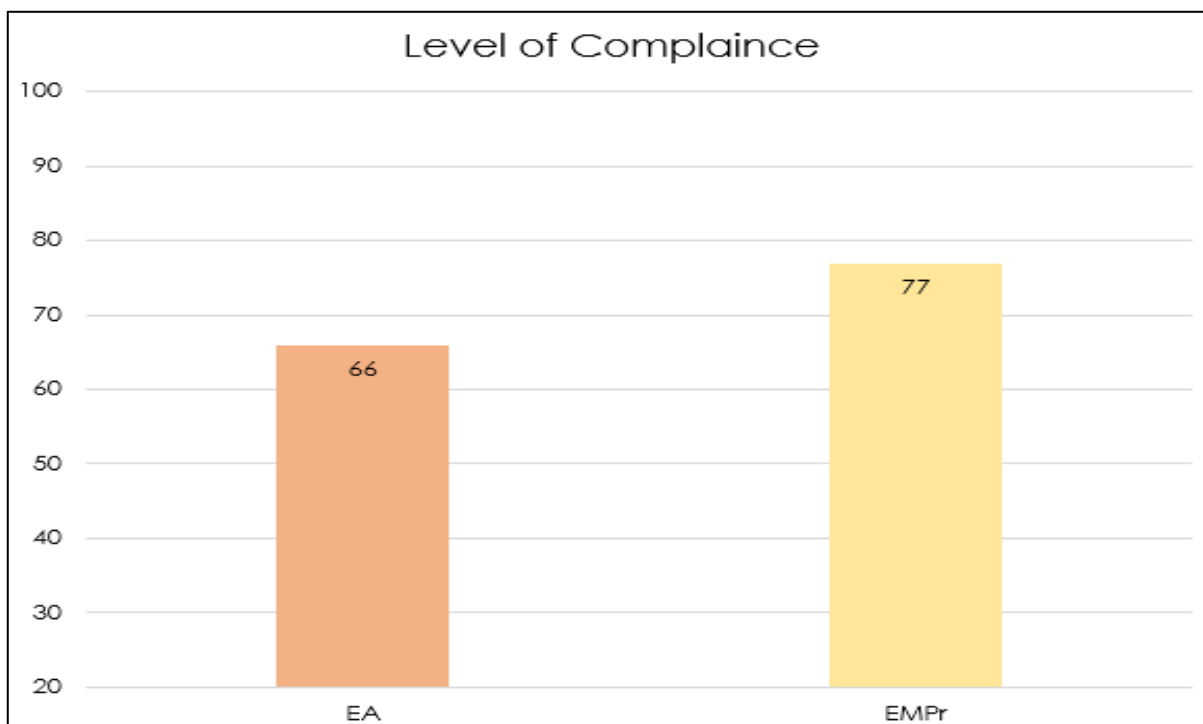
Requirement	Description
Appendix 7 (3): 1 - An environmental audit report prepared in terms of these Regulations must contain	
a) Details of – i. The independent person who prepared the environmental audit report; and ii. The expertise of the independent person that compiled the environmental audit report	Annexure A
b) A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Annexure B
c) An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Section 1
d) A description of the methodology adopted in preparing the environmental audit report.	Section 2
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 ongoing 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.	Section 5
f) A description of any assumptions made, and any uncertainties or gaps in knowledge.	Section 3
g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Section 2
h) A summary and copies of any comments that were received during any consultation process; and	Annexure C
i) Any other information requested by the competent authority	-

SUMMARY OF REPORT

According to the ECO's Environmental Monitoring Reports, the general compliance of the construction site is good, and no significant avoidable impacts were noted to the environment. The partial- and non-compliance issues were generally associated with administration or common issues arising from construction sites such as cement, waste management and demarcations. However more major non-compliance issues such as the stormwater outlet may be addressed through an Application for Amendment to the EA and EMPr through the competent authority. The road constructed along the western boundary remains a concern and must be dealt with to ensure that protection and restoration of the Open Space Area is implemented.

The new developer/owner is taking steps to correct compliance issues that have been identified since the appointment of the ECO. It is important that the EA be amended to the new owner's name so that the EA holder can take responsibility for ensuring compliance.

The following is a visual representation of the compliance that was found against the EA and the EMPr –



1. INTRODUCTION

ECO Route Environmental Consultancy has been appointed by **Bluerain Property Group Pty Ltd** to conduct an Environmental Audit pertaining to the construction activities for the Proposed development of Glenvillage Country Estate, formally known as Glen Haven Country Estate, on a Portion 52 of the Farm Kraaibosch 195, George, Western Cape in terms of the EA (16/3/1/1/D2/19-0025/12) and EMPr (GEO162/21).

The development originally comprised only phase 1 and phase 2. Subdivision of Portion 52 of 195 was granted by the George Municipality to allow for 4 phases. BA Developments nominated Bluerain Property Group and the transaction for the sale of the land takes place on a phase-to-phase basis in terms of duly exercised option agreement held by BA Developments. The entire property has been acquired and secured pending transfer and registration. Phase 1, erf number 26759 George, has already been transferred to Bluerain Property Group Pty Ltd on 9 January 2023 and phase 2 is in the process of registration.

This audit report is for the site situated on Glenwood Avenue in George, within the Garden Route region. It lies approximately 0.53 km east of Knysna Road and north of the Garden Route Mall. Bounded by Kraaibosch Country Estate to the east and Blue Mountain Estate to the west, the proposed development is set on Remainder Portion 52 of Farm Kraaibosch 195, located in George, Western Cape.



Figure 1: Locality map of Remainder Portion 52 of Farm Kraaibosch 195 (Mr. M. Bennet- ECO report November 2023)

The purpose of this audit report is to comply with condition 11 of the EA (16/3/1/1/D2/19-0025/12) which states that an environmental audit report must be prepared and submitted to the competent authority annually during the construction phase of the development.

Findings and recommendations in this report are based on evidenced gathered from Mr. John Sharples of Sharples Environmental Services CC (SES), the Environmental Control Officer (ECO) Mr. M Bennet of SES, Ms. Angelique Scheepers who represent the developer, verbal communication with the Contractor on site, and communications with Cape EA Practitioners. Attempts were made to contact the Applicant, Mr. Gregory Young, without success. Documents provided by the Engineer (Cobus Louw Pr. Eng) and Town Planner (Jan Vrolijk Town Planner) were used as evidence for this audit.

According to Appendix 7 of the amended Environmental Impact Assessment Regulations, 2014, published under Government Notice No. 982 in Gazette No. 3822 of 4 December 2014, in terms of sections 24(5) and 44 of the National Environmental Management Act, 1998 (Act No. 107 of 1998); The objectives of this audit report are to –

Objective
a) Report on – <ul style="list-style-type: none"> 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 measures provided for in the EMPr, and where applicable, the closure plan achieves 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.
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.

2. METHODOLOGY

On the 13th of February 2024, a site visit was conducted by Eco Route Environmental Practitioners (Auditors) and the Environmental Control Officer Mr. M. Bennet, to establish on site evidence supporting the audit report outcome. Additional documentation was requested from Angelique Scheepers who represent the developers (BA Developments (Pty) Ltd), to further support the conclusions reached in this audit. A systematic review approach was followed to determine whether the conditions and objectives have been met. The following table depicts key elements used during the audit.

Table 2: Key elements that were used during the audit.

Source	Content	Reference	Appendix
EA	Section E of the EA contains required conditions in terms of approval.	(16/3/1/1/D2/19-0025/12) Cape EA Prac.	1
EMPr	Throughout the EMPr certain recommendations and requirements were set out to	(GEO162/21) Cape EA Prac.	2

	mitigate the construction impact on the surrounding environment.		
ECO appointment documentation	Section 1 and 2 confirms the appointment of an ECO. As well as the duties to be performed.	Quotation number: ECO/GRG/H/10/23	3
ECO Reports	Two Environmental Monitoring Reports (November 2023 and December 2023).	(EMR/GRG/H/11/2023) SES (EMR/GRG/H/12/2023) SES	4 and 14
Site visit	Site visit completed on the 13 th of February 2024.	-	-
Notification of EA to I&APs	Notification letter from Greg Young (EA holder) and Sian Holder (EAP).	GEO162/31	5
Visual assessment report	Visual statement for Portion 52 of 195 Kraaibosch, George.	Annexure G5 (Visual statement 2013)	6
Part 1 Amendment application	Amendment application by Sharples Environmental Services (SES) – to be submitted pending the audit outcome.	AMD/BD/P52KB/11/23	
Site development plans (as per EA and Part 1 amendment)	SDP dated October 2012 as per the Environmental Authorisation. SDP submitted for Town Planning approval for Phase 1.		7
Sewage and stormwater layout plans	Plans were provided by Cobus Louw Pr. Engineers for Phase 1 and Phase 2. Phase 1 - Stormwater layout plan, and sewer layout plan, Phase 2 - Stormwater layout & stormwater manhole details, and Sewer layout and typical road cross sections.	Layout Plans dated October 2022: G 435-2 G 435-3 Layout Plans dated September 2023: G 435P2-2 G 435P2-3	8
Service Level Agreement	Service Level Agreement with George Municipality dated 31 March 2016	Service Agreement: Glen Haven Country Estate (Pty) Ltd: 31/03/2016	9
Town Planning approvals	Town planning approvals from George Municipality received from Jan Vrolijk Town Planner.		10
Notification letter to DEA&DP of the commencement of construction activities	No evidence available.		
Tender documents	None received.		
Architectural Guidelines / HOA Guidelines	Glen Village Country Estate Architectural Guidelines approved by the George Municipality 26/08/2022.	Glen Village Country Estate Architectural Guidelines Revision 001 – April 2022.	11
Invasive Alien Control Plan or Rehabilitation Plan for the southwest portion	Contained within the EMPr under Section 5.2 (Rehabilitation and Management of Open Space).	(GEO162/21) Cape EA Prac.	2

Method statements submitted by the contractors	None received.		
Evidence of ECO induction (registers)	Contained in ECO Report for November 2023 as photographic evidence. Register supplied by ECO.	(EMR/GRG/H/11/2023) SES SES Register dated 21 February 2024.	12
Fax transmission cover memorandum	George Municipality Involvement confirmation of the stormwater outlet on Erf 23997.	G435 of 26 November 2015	13
Letter from Bluerain Property Group Pty Ltd	The letter serves to clarify and confirm the historic and current status of the Property that is being developed by Bluerain Property Group Pty Ltd.	Letter dated 25 March 2024.	14
Method Statements	MS Alien Removal MS Concrete Batching MS Erosion Control MS Petroleum MS Site Clearing MS Solid Waste	BA Developments Pty Ltd Method Statements	15
Landscape Development Plan	Landscape Development Plan produced for Phase 2 of the development.	Rev: 02 of 2022.09.30.	16

- Provided documents were systematically reviewed to determine compliance based on the following criteria -

Full Compliance (1) – Implemented actions fully comply with the requests and conditions as set out in the EA / EMPr, supported by evidence justifying the outcomes.

Partial Compliance (0.5) - Implemented actions partially comply with the requests and recommendation as set out in the EA / EMPr. In one way or another it does not meet the full requirements set out in the specified recommendations and / or mitigation measures, supported by evidence justifying the outcomes

Non – Compliance (0) – Implemented actions do not comply with the requests and condition as set out in the EA / EMPr, supported by evidence justifying the outcomes

Non - compliance actions will be assigned into three sub-criteria based on the impact on the environment.

Minor	The impact has no effect on the environment
Major	The impact has some (to be specified) effect on the environment
Critical	The impact has extreme (to be specified) effect on the environment

Assumptions (Not scored) – Certain stages throughout the audit may require the Auditor to make assumptions. All assumptions will be noted.

Not Monitorable (N/M) (Not scored) – The requests and condition outlined in the EA / EMPr is not monitorable and will be noted as such.

Noted (N) (Not Scored) – Additional to the actionable requests and condition outlined in the EA / EMPr, some requests and condition need to be included for general awareness and will be documented as noted.

- Each level of compliance will be assigned a score, after which total compliance will be calculated. The total compliance will be communicated based on the categories defined in the EA / EMPr.

Level of effectiveness	Score
Full Compliance	1
Partial Compliance	0.5
Non - Compliance	0
Assumptions	-
Not Auditable (N/A)	-
Noted (N)	-

* Only scored conditions will add towards the compliance score.

Calculations:

$$(\text{Number of conditions}) - (\text{Number of assumptions, N/M, and N conditions}) = \text{Total usable conditions}$$

$$((\text{Score of full compliance} + \text{partial compliance}) / \text{Total Usable conditions}) \times 100 = \text{Percentage Compliance}$$

- The initial version of the audit report was submitted to the competent authority (DEA&DP). Feedback was received on 5 July 2024, which requested amendments to the audit report. Additionally, a subsequent Public Participation Process was required to accompany the recommended changes to the EA and EMPr.

3. ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE

This audit report was completed based on information received from relevant parties and observations made by the Auditor. It is assumed that all parties had the agenda of best practice. It is assumed that no evidence has been withheld from the Auditor. Where documents or evidence was not received or could not be found it is assumed for the purpose of this audit that such documents or evidence does not exist.


Uncertainties and gaps in knowledge include –

1. The Auditor was unable to locate evidence that the competent authority was given notice of commencement of construction activities.
2. Uncertainty whether the appeal period allowed for a sufficient commenting period. I&APs were given only 14 days of the 20-day appeal period.
3. It is assumed that certain conditions were not met by the holder of the EA prior to the appointment of the ECO on 19 October 2023


4. It is assumed that no ECO was appointed prior to the commencement of construction activities and clearing of vegetation. It is therefore also assumed that no Environmental Induction or workshops were undertaken.
5. It cannot be determined whether the EMPr was included in all contract documentation for all phases of the development, or whether the Contractor and Sub-Contractors are aware of the EMPr.
6. It is assumed that annual audit reports have not been submitted to the competent authority.

4. EA (16/3/1/1/D2/19-0025/12) COMPLIANCE

CONDITIONS OF ENVIRONMENTAL AUTHORISATION			
No.	Conditions	Compliance	Notes
1	This environmental authorisation is valid for a period of five years from the date of issue. The holder must commence with all the listed activities within the said period or this environmental authorisation lapses and a new application for environmental authorisation must be submitted to the competent authority unless the holder has lodged a valid application for the amendment of the validity period of this environmental authorisation before the expiry of this environmental authorisation. In such instances, The validity period will be automatically extended ("the period of administrative extension") from the day before this environmental authorisation would otherwise have lapsed, until the amendment application for the extension of the validity period is decided. The listed activities, including site preparation, may not commence during the period of administrative extension	1	<p>Full Compliance</p> <p>Evidence is based on Google Earth images between August 2013 and August 2018 (see below). The commencement letter and ECO reports were not available to the auditor as evidence of listed activities commencing within the 5-year validity period.</p> <p>Activity 9: construction of infrastructure for bulk transportation of stormwater – within 32m of a watercourse, measured from the edge of the watercourse. Installation of the stormwater pipe on the western boundary can be seen commencing in April 2017. The activity is within 32m of the off-site, small unnamed tributary located on the Kraaibosch Country Estate property.</p> <p>Activity 11: construction of infrastructure or structures covering 50m² in size within 32m of a watercourse. Installation of the stormwater pipe and construction of the road on the western boundary can be seen commencing in April 2017. The activity is within 32m of the off-site small unnamed tributary located on the Kraaibosch Country Estate property. The construction of the first house can be seen in March 2018.</p> <p>Activity 23: The transformation of undeveloped, vacant, or derelict land to residential. The rezoning of the property from Agricultural I to Subdivisional Area allow for Residential development was approved on 12 September 2013. Evidence as per the Approval letter from George Municipality (Reference number: Kraaibosch195-52 George, 12 September 2013).</p>

					
2	The listed activities, including site preparation, may not commence within 20 (twenty) calendar days of the date of	0	.	5	<p>Partial Compliance</p> <p>The appeal process notification was published in the George Herald on 08/08/2013 to 21/08/2013 on behalf of the EA Holder by Cape EA Practitioners. The dates given for</p>

	<p>issue of this environmental authorisation. In the event that an appeal notices and subsequent appeal is lodged with the competent authority, the effect of this environmental authorisation may be suspended until such time as the appeal is decided.</p>				<p>the appeal process allowed for a two-week appeal period. From the date the EA was granted on 02/08/2013 to the date of the appeal deadline was 20 calendar days. See Appendix 15.</p> <p>I&APs were given 14 days of the 20-day appeal period according to the dates provided.</p>
3	<p>The applicant must in writing, within 12 (twelve calendar days) of the date of this decision and in accordance with regulation 10(2)-</p> <p>3.1. Notify all registered interested and affected parties of</p> <ul style="list-style-type: none"> • The outcome of the application • The reason for the decision as indicated in Annexure 1 • The date of the decision; and • The date of issue of issue of the decision <p>3.2. Draw the attention of all registered interested and affected parties to the fact that on appeal may be lodged against the decision in terms of Chapter 7 of the Environmental</p>	1			<p>Full Compliance</p> <p>Both the holder (Mr. Young) and the Environmental Assessment Practitioner (EAP) (Mrs. Holder) fulfilled their obligation to notify Interested and Affected Parties (I&APs) regarding the project. Mrs. Holder's auditable notification, sent on the 6th of August 2013, was issued within the required time frame stipulated for notification, demonstrating compliance with regulatory requirements.</p> <p>In addition to the notification sent by Mrs. Holder, a publication regarding the project appeared in the George Herald newspaper on the 8th of August 2013. This publication served as an additional means of informing the public and interested stakeholders about the project, ensuring transparency and accessibility of information regarding the proposed development.</p>


	<p>Impact Assessment Regulations, 2010 detailed in section F below.</p> <p>3.3. Draw the attention of all registered interested and affected parties to the manner in which they may access the decision. And</p> <p>3.4. Publish a notice in the newspapers contemplated in regulation 54(2) (c) and (d), and which newspaper was used for the placing of advertisements as part of the Public Participation Process, that –</p> <ul style="list-style-type: none"> • Informs all interested and affected parties of the decision • Informs all interested and affected parties where the decision can be accessed; and • Informs all interested and affected parties that an appeal may be lodged against the decision in terms of Chapter 7 of the Regulations 			
4	The holder of the environmental authorisation must give the competent authority written notice of commencement of the construction activities and provide proof of compliance		0	<p>Non-Compliance (Minor)</p> <p>The Auditor was unable to locate evidence that the competent authority was given notice in terms of point 4.1. and 4.2.</p> <p>The condition is administrative in nature and has no direct impact on the environmental surroundings.</p>

	<p>with the specified conditions of authorization. With regard to the notices, the holder must –</p> <p>4.1. Within thirty (30) calendar days of the date of issue of this decision give notice, with proof of compliance with conditions 2 and 3 above,</p> <p>4.2. Give seven (7) calendar days' notice before commencement of construction activities. This notice must include proof of compliance with the following conditions described herein: Conditions: 8 and 17</p>				
5	<p>The holder is 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.</p>	0 .	5		<p>Partial Compliance</p> <p>Sharples Environmental Services were appointed as ECO on 19 October 2023 by Bluerain Property Group Pty Ltd. It can be assumed that this condition was not met by the holder of the EA prior to the appointment of the ECO. The new developer, BA Developments (Pty) Ltd), is aware of the responsibility. See letter attached as Appendix 14 that clarifies and confirms the historic and current status of the Property that is being developed.</p>
6	<p>Any changes to, or deviations from the scope of the description set out in section B above must be accepted or approved, in writing, by the competent authority before such changes or deviations may be implemented. In assessing whether to grant such</p>	1			<p>Full Compliance</p> <p>No changes or deviations from the scope of the description set out in Section B of the EA (16/3/1/1/D2/19-0025/12) describing the approved listed activities, or the correction notice dated 2 August 2013, have been implemented.</p> <p>A Part 1 Amendment will be submitted to DEA&DP for change of the holder of the EA, and for rezoning to allow Estate housing and public street instead of the Retirement Resort.</p>

	acceptance/approval or not, the competent authority may request such information as it deems necessary 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.				
7	The applicant must notify the competent authority in writing, within 24 hours thereof if any condition herein stipulated is not being complied with.		0		<p>Non-Compliance (minor)</p> <p>Throughout the audit period, non-compliances were identified. However, there was no documentation provided regarding the notification of previous non-compliances.</p> <p>The condition is administrative in nature and has no direct impact on the environmental surroundings.</p>
8	The holder must appoint a suitably experienced environmental control officer ("ECO") for the construction phase before commencement of any land clearing or construction activities to ensure compliance with the Environmental Management Programme ("EMP") and the conditions contained herein.		0		<p>Non-Compliance (major)</p> <p>Based on the revised documentation, it has been determined that Sharples Environmental Services (SES) was the first Environmental Control Officer (ECO) appointed for this development. The appointment of SES as the ECO occurred on the 19th of October 2023.</p> <p>It is anticipated that the ECO would have ensured environmental best practices, identified impacts with major or critical consequences on the environment, and addressed any undetected impacts that could have been avoided if an ECO had been appointed at the start of the development. It is here fore that the non-compliance was noted as major, as it has a direct impact on the surrounding environment.</p>
9	Should a centralized gas system be installed a service provider for the monitoring and maintenance of the central gas system must be appointed and an emergency response plan				<p>Not Monitorable</p> <p>There is no centralized gas system installed for the development of Glen Haven Country Estate as confirmed by the Building Contractor.</p>

	should be developed in accordance with relevant safety requirements, prior to installation of the gas system. The emergency response plan must be strictly implemented and updated, when necessary.				
10	All mitigation measures recommended by the visual specialist, the electrical engineer and architect, as well as the screening of the Western and Southern boundaries must be strictly Implemented.	1			<p>Full Compliance</p> <p>The architectural guidelines have been approved by the George Municipality on the 26th of August 2022. By implication all the mitigation measures have been taken into consideration.</p> <p>Visual Compliance Report:</p> <p>6.1. Contrasting of roof and wall shades - Architectural Guidelines.</p> <p>6.2. Removal of Alien Vegetation - This is addressed in the EMPr. <i>The following recommendation is noted - Before removal of all alien species, it is suggested that the environmental control officer (ECO) observe the trees for nesting and roosting use of large bushes and trees before the decision to fell individual plants is taken.</i></p> <p>6.3. Greening within open spaces & road reserves - Addressed in the EMPr. Planting of indigenous trees was observed in Phase 1 as per the ECO Report dated November 2023.</p> <p>6.4 Surface Water Management - Addressed in Stormwater Engineering Plan.</p> <p>6.5 Master Plan for the Landscape Development of the Site - appoint a suitably qualified person such as a professional Landscape Architect. A Landscape Development Plan for Phase 2 was developed by IDP Landscape Architect and KAINOS Landscape Architects, attached as Appendix 16. The Landscaper, David Ramage of B Green Pty (Ltd), has been appointed to assist with the selection and planting of indigenous plants within the private and open space areas to create green corridors.</p>

11	An environmental audit report must be prepared and submitted to the competent authority annually during the construction phase of the development, with the final audit report to be submitted within one year following the completion of the construction phase.		0	<p>Non-Compliance (minor)</p> <p>This report (Ref: 2024/01/03) is the first audit report since the commencement of activities on Portion 52 of 195 Kraaibosch, George.</p> <p>The condition is administrative in nature and has no direct impact on the environmental surroundings.</p>
12	All energy and water conservation measures and waste management principals described by the EMP must be implemented.	1		<p>Full-Compliance</p> <p>The approved architectural guidelines address water and sustainability (water, energy, waste).</p>
13	A public walkway must be established along the southwestern boundary of the property between the public and private open space. This public walkway will extend from the most southern point of the property all along the southwestern boundary of the property and within the road reserve.			<p>Not Monitorable</p> <p>This has not commenced.</p> <p>The SDP shows the public / municipal road extending from the public 'Servitude Road' down the property north-western boundary, before crossing the middle of the property west to east.</p> <p>Recommendation: The public walkway must form part of this road. The walkway must be built before transferring it to the Municipality.</p>
14	No fencing may be erected between the areas to be zoned as public and private open space.	1		<p>Full Compliance</p> <p>This forms part of Phase 2, 3 and 4 which have not been completed. Currently no fencing around this area exists.</p> <p>Recommendation: the 7 small private Open Spaces must form a corridor within and through the dwelling layout towards the large open space to the south. This must be captured in a Master Landscape Development Plan for all Phases.</p>

15	The Public Open Space in the southwest of the property should be rehabilitated to as near as natural as possible.				<p>Not Monitorable</p> <p>This has not commenced yet.</p>
16	The proposed development must include a minimum of 2.2ha of Private Open Space (or similar zoning) in the southern part of the property, as indicated in the April 2013 revised layout: Alternative 3.		0		<p>Non-Compliance (major)</p> <p>It was observed that vegetation clearance has occurred along the western boundary to make way for a future road, as indicated in the Kraaibosch Roads Master Plan. Specifically, the road is identified as Road 5.1 in the SMEC update report, as illustrated in the image below.</p>  <p>The current owners have cleared vegetation beyond the designated servitude road waypoint as per the approved SDP. The extent of this clearance reduces the open space size below 2.2 ha (illustrated by the red line in the provided image below).</p>



Clearance of vegetation designated to the construction of a road.

Date: 2024/03/11
 Project: 01 – Glen Haven Audit
 Drawn By: Justin Britton

Aerial Imagery – Google Earth 2024
 Cadastral Boundary – Cape Farm Mapper 3



As the new owners were convinced of the road alignment, additional fill material, assumed to be retained from the current development phases, was used to build up and stabilise the road.



This non-compliance has a major impact on the surrounding environment as it reduced the requested open space area below the required recommendations.

					Recommendation: It is recommended that the road be removed to the point that reflects the correct alignment as per the approved SDP, and rehabilitated. The servitude road should be surveyed to mark on the ground the exact position/alignment.
17	<p>The draft Environmental Management Programme ("EMP") submitted as part of the application for environmental authorisation is hereby approved on condition that the following amendments are made to the EMP and must be implemented.</p> <p>17.1. Incorporate all the conditions given in this Environmental Authorisation</p> <p>17.2. Be included in all contract documentation for all phases of the development</p> <p>17.3. Describe the level and type of competency required of the Environmental Control Officer ("ECO"), or Environmental Site Agent where applicable.</p> <p>17.4 Determine the frequency of site visits.</p> <p>17.5. Meet the requirements outlined in Section 24N (2) & 3 of the National Environmental management Act, 1998 (Act no 07 of 1998, as amended) ("NEMA") and Regulation 34 of</p>	0 . 5			<p>Partial Compliance</p> <p>The final EMPr (GEO162/21) has been updated to include the conditions specified in the EA. It cannot be determined whether the EMP is included in all contract documentation for all phases of the development, otherwise all other conditions have been met.</p>

	<p>the Environmental Impact Assessment Regulations 2006</p> <p>17.6 Provide for the utilization of local labour as far as possible, this may include record keeping and reporting procedures for monitoring purposes</p> <p>An application for amendment to the EMP must be submitted to the competent authority if any further amendments are to be made to the EMP, other than those mentioned above, and this may only be implemented once the amended EMP has been authorised by the competent authority. The EMP must be included in all contract documentation for all phases of implementation.</p>				
18	<p>A copy of the environmental authorisation and the EMP 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 EMP 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</p>	1			<p>Full Compliance</p> <p>An ECO file is kept on site that contains the EMPr, EA and ECO reports.</p>

	herein. The environmental authorisation and EMP must also be made available for inspection by any employee or agent of the applicant who works or undertakes work at the site.				
19	<p>The applicant must submit an application for amendment of the environmental authorisation to the competent authority where any detail with respect to the environmental authorisation must be amended, added, substituted, corrected, removed or updated. Further, the rights granted by this environmental authorisation are personal rights (i.e. not attached to a property, but granted to a natural or juristic person). As such, only the holder may undertake the activities authorised by the competent authority. Permission to transfer the rights and obligations contained herein must be applied for in the following manner</p> <p>19.1. The applicant must submit an originally signed and dated application for amendment of the environmental authorisation to the competent authority stating that he/she wishes the rights and obligations contained herein to be transferred. and</p>	1			<p>Full Compliance</p> <p>Sharples Environmental Services have been appointed to complete the Part 1 Amendment. The amendment will be to change the holder of the EA from Mr. Gregory Young to BA Developments (Pty) Ltd on the Environmental Authorizations for the activities granted-on 1 August 2013 (Ref: 16/3/1/1/D2/19-0025/12).</p>

	<p>including (a) confirmation that the environmental authorisation is still in force (i.e. that The validity period has not yet expired or the activity/ies was/were lawfully commenced with); (b) the contact details of the person who will be the new holder; (c) the reasons for the transfer: (d) an originally signed letter from the proposed new holder acknowledging the rights and obligations contained in the environmental authorisation and indicating that he/she has the ability to implement the mitigation and management measures and to comply with the stipulated conditions.</p> <p>19.2. The competent authority will issue an amendment to the new holder either by way of a new environmental authorisation or an addendum to the existing environmental authorisation if the transfer is found to be appropriate.</p>				
20	<p>Non-compliance with a condition of this environmental authorisation or EMP may result in suspension of this environmental authorisation and may render the holder liable for criminal prosecution.</p>		0 . 5		<p>Partial Compliance</p> <p>Non-compliance has occurred however the new developer is taking steps to rectify the non-compliance.</p>
21	<p>Notwithstanding this environmental authorisation, the</p>	1			<p>Full Compliance</p>

	holder must comply with any other statutory requirements that may be applicable to the undertaking of the listed activities.				
22	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 landfill licensed in terms of the applicable legislation.	1			<p>Full Compliance</p> <p>As per communications with the ECO, there has been significant improvement in waste management, and this will be resolved before the next Environmental Monitoring Report. The contractor has made considerable effort to address the issues associated with waste management. The Asla site has marked bins and waste management is up to standard.</p>
23	No surface or ground water may be polluted due to any actions on the site. The applicable requirements with respect to relevant legislation pertaining to water must be met.	1			<p>Full Compliance</p> <p>The ECO noted concrete spillage on site and some mixing that is not on impermeable layers in the November and December 2023 Environmental Monitoring Reports. Concrete spillage was addressed on site.</p> <p>As per communications with the ECO, no further spillages have occurred, and batching is not taking place on bare soil. No other pollution was observed by the auditor.</p>
24	The applicable requirements with respect to relevant legislation pertaining to cutting, damaging, disturbing, or destroying protected trees or trees from a natural forest must be adhered to.				<p>Not Monitorable</p> <p>There are no protected trees or protected forest on the property.</p>
25	The applicable requirements with respect to relevant legislation pertaining to occupational health and safety must be adhered to.	1			<p>Full Compliance</p> <p>ZEALOUS OHS (PTY) LTD was appointed as Health and Safety Consultant for this project, details below.</p>

					<p>F.G. Bosman Zealous OHS (Pty) Ltd Cell: 081 766 6799 Email: zealous.ohs@gmail.com</p>
26	<p>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.</p> <p>A qualified archaeologist must be contracted where necessary (at the expense of the applicant and in consultation with the relevant authority) to remove any human remains in</p>				<p>Not Monitorable</p> <p>No heritage resources have been discovered to date, according to the Environmental Monitoring Reports (Appendix 4).</p>

accordance with the requirements of the relevant authority.					
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5. EMPR (GEO162/21) COMPLIANCE

CONDITIONS OF ENVIRONMENTAL MANAGEMENT PROGRAMME				
PRE-CONSTRUCTION & OPERATIONAL DESIGN CONSIDERATIONS				
Section	Conditions	Compliance		Notes
4.1 Energy Conservation	The implementation of energy saving mechanisms is strongly recommended and must be considered.	1		<p>Full Compliance</p> <p>Section L of the architectural guidelines (Glen Village Country Estate Architectural Guidelines Revision 001 – April 2022.), approved by the George Municipality on August 26, 2022, outlines specific energy-saving measures that were taken into account. See below:</p> <p>Energy : Solar Panels – colour to be aligned with the roof colour, and to be positioned flush with the sheeting, and substructure allowed on pitched roofs only. Only solar panels may be visible on the roof. It is recommended to make use of a standing seam profile sheeting as it is possible to clamp on as opposed to drilling into sheeting. It is also recommended to make use of low energy consuming appliances and lightbulbs. Gas tanks are encouraged as they are energy efficient. 2 x 9L tanks stored in a health and safety compliant cage and the gas system must have a COC – certificate of compliance.</p>
4.2 Water Conservation	The implementation of water saving mechanisms is strongly recommended and must be considered.	1		<p>Full Compliance</p> <p>Section L of the architectural guidelines (Glen Village Country Estate Architectural Guidelines Revision 001 – April 2022.), approved by the George Municipality on August 26, 2022, outlines specific water-saving measures that were taken into account. See below:</p>

Water: Rainwater collection in water tanks are intended for garden watering, and grey water systems, these tanks are to be standard green or grey "Jojo" type tank of 1000 – 5000 litres for phase 1 - as per council approval. They are to be positioned to be screened by trellises as per above chapter. Rainwater run-off that cannot effectively be channelled to rainwater storage tanks should be channelled into the street storm water system or dispersed on the stand in a controlled way to avoid erosion and the potential damage to properties at lower levels.

Water-saving measures to be taken in this development. This would include:

- Low flowing shower heads and taps.
- Dual flush low flow toilet cisterns.

Rainwater tanks were observed by the Auditor on site and noted in the November 2023 Environmental Monitoring Report by SES.



4.3
Pre-
construction
environmental
compliance
workshop

It is required that a pre-construction environmental compliance workshop be undertaken before any construction commences on site. This workshop can be combined with a site handover meeting but must take place before any activities take place on site and before any plant is moved onto site.

0

Non-Compliance (minor)

No evidence of a pre-construction environmental compliance workshop being held prior to commencement of construction activities.


The non-compliance resultant as a lack of environmental training is administrative in nature and impose a direct environmental impact. Compared to not employing an ECO, which has a cumulative major impact on the environment, this condition will remain a minor non-compliance.

Recommendation: The pre-construction environmental compliance workshop is no longer applicable as work has already commenced and the site handed over. It is recommended that environmental induction be undertaken prior to

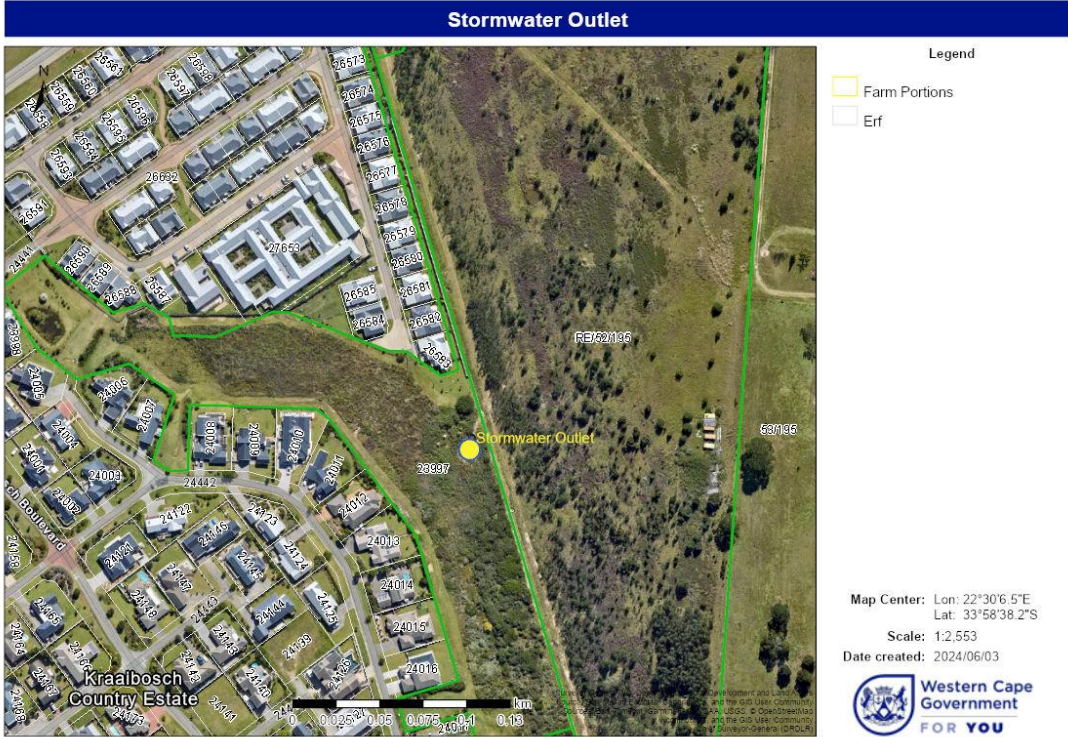
commencement of Phase 3 and again for Phase 4. The ECO has undertaken 2 environmental inductions to date.


CONSTRUCTION ENVIRONMENTAL MANAGEMENT REQUIREMENTS

<p>5.1 Botanical requirements</p>	<p>The ECO must conduct a site visit prior to the start of construction to determine any site sensitivities.</p> <p>Sensitive and indigenous vegetation should be rescued before the start of construction.</p> <p>It is further recommended that the rescued vegetation be used in rehabilitations. With specified reference to the southern and western boundaries, as well as the entire new public road verge.</p> <p>Alien vegetation must be removed according to the recommendations.</p>	<p>1</p>			<p>Full Compliance</p> <p>The ECO noted the clearing of alien vegetation. Additionally, indigenous plants have been rescued a potted in black bags. A small nursery section has been set up at a safe location on site for the preservation of indigenous rescued plants. It is recommended that the rescued plants be used in rehabilitations, with specific focus on the southern and western boundaries, as well as the entire new public road verge.</p>
<p>5.2 Rehabilitation and management of open space</p>	<p>Any pedestrian and /or cycle path that links with the rest of the Kraaibosch open space network must take place within the public open space area along the property western boundary.</p>				<p>Not Monitorable</p> <p>This has not commenced. The route will be determined when the road is constructed.</p>

					Recommendation: The pedestrian and /or cycle path must be incorporated into the landscape plan.
	The exact positioning of potential pedestrian / cycle routes must be determined on site with input from the ECO, Engineer, George Municipality, and adjacent landowners.				Not Monitorable This has not commenced. The route will be determined when the road is constructed. Recommendation: The route must be determined with input from the ECO, Engineer, George Municipality and adjacent landowners. The pedestrian and /or cycle path must be incorporated into the landscape plan.
	The areas of private and public open space across the southern portion of the property (excluding the proposed clubhouse and bowling greens) must be protected and rehabilitated as far as possible.	0.5			Partial Compliance A boundary fence has been erected with shadecloth on the southern side of the construction activities to demarcate the no-go area. Removal of alien vegetation has commenced.  According to the November and December 2023 EMR, no-go areas are still to be demarcated for the new area (Phase 3 &4) to be developed (Appendix 4). Please also see Condition 16 of the EA for non-compliance in terms of protecting no-go areas.

	This entire boundary of the public open space area must be demarcated as defined in this EMP prior to commencement of any construction activities.	0.5		<p>Partial-Compliance</p> <p>The March ECO report (Appendix 4) reveals that certain demarcations have been implemented to prevent construction encroachment into the southern open space area. However, the entire boundary of the public open space area has not been demarcated as per this specification of the EMPr.</p> <p>Recommendation: the entire boundary of the Open Space area to the south must be determined and demarcated appropriately, as approved by the ECO.</p>
	All alien plants species must be removed from the entire property, including the public opens space area to be excluded from the development according to the EMP.	1		<p>Full Compliance</p> <p>Alien vegetation removal has commenced and will be monitored by the ECO.</p>
5.3 Topsoil handling	In terms of best practice and for rehabilitation purposes, it is essential that a 150mm layer of topsoil from the entire development footprint (excluding public open space area) is stripped and stockpiled prior to the commencement of construction activities.	1		<p>Full-Compliance</p> <p>Stockpiles are stored separately during the current phase construction and is being monitored by the ECO.</p>
5.4 Environmental Control officer	It is recommended that an Environmental Control Officer (ECO) be appointed for the construction activities on portion 52 of 195.	0.5		<p>Partial Compliance</p> <p>Sharples Environmental Services were appointed as ECO on 19 October 2023 by the Bluerain Property Group Pty Ltd. It can be assumed that this condition was not met by the holder of the EA prior to the appointment of the ECO.</p>


	The requirements and duties are stipulated in the EMP.			
5.5 Erosion control and stormwater management	Any formal stormwater infrastructure must ensure that discharge points must be contained within the property boundaries of Portion 52/195 and are designed in such a way as to negate erosion.		0	<p>Non-Compliance</p> <p>As per the stormwater layout plan, the stormwater outlet is positioned on erf 23977 and within 32m of the off-site drainage line to the west of the property. From Google Earth imagery it appears to have been constructed between May and June 2017 following the installation of the stormwater pipeline along the western boundary.</p>  <p>Information from Cobus Louw Pr. Eng. - Originally a stormwater outlet on the border between erven 195/52 and 23997 exist on the Northern side. This outlet was on erf 23997 side of the fence. The developer of erf 23997 placed a berm on their side of the fence forcing the</p>

					<p>water towards erf 195/52. The stormwater under dispute was partially generated from erf 23997, 195/52 and the greater George Municipal area. An agreement was reached as per attached letter (Appendix 13), that a new stormwater pipe will be installed in the public road reserve to handle the stormwater. This decision was beneficial to all parties involved, George Municipality, owner of erf 195/52 and 23997. The cost was distributed between the owner of erf 195/52 (32%) and George Municipality 68%), with the owner of erf 23997 contributing their share through a capital payment to the municipality. The stormwater outlet was established on erf 23997 as per the agreement, and the installation of the pipe occurred through a tender process, overseen by Hilland during their tenure as Environmental Control Officer (ECO).</p> <p>Recommendation: The stormwater structure is built outside the boundary of erf 195/52, and therefore remains a non-compliance. However, as it benefits both erf 23997, erf 195/52, and the George Municipality, it is recommended that the EMPr be amended to incorporate the position of the stormwater outlet.</p>
	<p>The stormwater outlets should contain suitable energy dissipating structures designed to reduce water energy, dispersing the water rather than concentrating it.</p>	1			<p>Full Compliance</p> <p>The stormwater outlet functions as a retention pond whereby collected stormwater drained from the stormwater system of the estates is allowed to dissipate into the drainage line area without causing erosion.</p> 

	Any areas that are identified by the ECO as being prone to erosion must be suitably protected with for e.g. silt fencing and/or sandbags during the earthworks / construction period.				<p>Not Monitorable</p> <p>No areas identified by the ECO.</p>
	Any erosion channels developed during construction on steep slopes must be backfilled, compacted, and restored to an acceptable condition.				
	Stabilisation of cleared areas to prevent and control erosion and/or sedimentation shall be actively managed.	1			<p>Full Compliance</p> <p>This is being monitored by the ECO.</p>
5.8 Waste management	It is recommended that an integrated waste management approach must be adopted and implemented, based on waste minimization.	1			<p>Full-Compliance</p> <p>There was partial-compliance with Waste Management as per the Environmental Monitoring Reports for December 2023 to March 2024.</p> <p>As per communications with the ECO, there has been significant improvement in waste management, and this will be resolved before the next Environmental Monitoring Report. The contractor has made considerable effort to address the issues associated with waste management. The Asla site has marked bins and waste management is up to standard.</p>
	Only approved waste disposal methods will be allowed. The Contractor shall ensure that all site personnel are instructed in the proper disposal of all waste.	1			
	Disposal of all waste materials must be done at suitable facilities. No dumping of any waste	1			

	material on or off site is permitted.				
5.9 Sanitation	Chemical ablution facilities must be available for the use by construction staff for the duration of the construction period.	1			<p>Full Compliance</p> <p>Chemical ablution facilities are available on site. No issues were noted by the ECO in the Environmental Monitoring Reports for November 2023 to March 2024.</p>
5.11 Demarcation of working areas	The demarcation of no-go areas is of extreme importance to ensure that damage is restricted to the future developed area and that areas outside this demarcated area are protected and not damaged unnecessarily.		0.5		<p>Partial Compliance</p> <p>A boundary fence has been erected with shade cloth on the southern side of the construction activities to demarcate the no-go area. However, the entire boundary of the public open space area has not been demarcated as per this specification of the EMPr.</p> <p>According to the November 2023 to March 2024 EMR, no-go areas are still to be demarcated for the new area to be developed.</p> <p>Recommendation: the boundary of the Open Space area to the south must be determined and demarcated appropriately, as approved by the ECO.</p>
5.12 Environmental awareness training	The ECO in consultation with the contractor shall ensure that adequate and on-going environmental awareness training of senior site personnel takes place and that all construction workers receive an induction presentation on the importance and implications of the EMP.	1			<p>Full Compliance</p> <p>The appointed ECO has undertaken environmental awareness training on 22 November 2023 (see November Environmental Monitoring Report by SES) and 21 February 2024 as per the signed register (Appendix 12).</p>
5.13 Concrete batching	Concrete batching may only take place in areas approved by the ECO.	1			<p>Full Compliance</p>

	Concrete mixing areas must have bund walls or a settling pond in order to prevent cement run off. Once the settling ponds dry out, the concrete must be removed and dispatched to a suitable disposal site. Ideally, all concrete batching should take place on an area that is to be hard surfaced as part of the development (possibly within the future road surface or within the footprint of the care centre).				<p>The ECO noted concrete spillage on site and some mixing that is not on impermeable layers in the November and December 2023 Environmental Monitoring Reports. Concrete spillage was addressed on site.</p> <p>As per communications with the ECO, no further spillages have occurred, and batching is not taking place on bare soil.</p>
5.14 Fuel storage	Should a temporary fuel storage facility be required, the Contractor must ensure that he/she complies with legislation.				No fuel storage was observed on site.
5.15 Dust management	Every effort to minimize dust pollution on the site must be undertaken especially considering the properties close location to existing residential areas. Construction vehicles must adhere to speed limits and minimization of haul roads must be implemented. During dry, dusty periods haul roads should be kept dampened to prevent	1			<p>Full Compliance</p> <p>The ECO report from March 2024 highlighted the implementation of dust control measures on the site. Efforts were made to minimize dust pollution, particularly due to the site's proximity to existing residential areas.</p>

	excess dust. No potable water may be used for damping haul roads.				
5.16 Establishment of contractors site camp	The Contractors Site Camp must be established in consultation with the ECO. The site camp may not be erected on any areas considered sensitive and no indigenous vegetation may be removed, damaged or disturbed without consent from the ECO.	1			<p>Full Compliance</p> <p>The site camp is established and fenced off with shade cloth.</p> 
7.	Should any heritage remains be exposed during excavations, these must be immediately reported to the Provincial Heritage Resource Authority of the Western Cape, namely Heritage Western Cape in terms of the national Heritage Resources Act (Act No. 25 of 1999). Heritage remains uncovered or disturbed during earthworks may not be disturbed further until the necessary approval has been obtained from Heritage Western Cape.				No heritage resources have been discovered to date, according to the Environmental Monitoring Reports (Appendix 4).

<p>8. Method statement</p>	<p>The Contractor shall not commence the activity for which a method statement is required until the Engineer and ECO have approved the relevant method statement (see EMP for details on which activities require method statements).</p>	<p>0.5</p>	<p>Partial Compliance</p> <p>The ECO did not receive Method Statement since their appointment on 19 October 2023. Method statements were submitted to the auditor following the Auditors site inspection. Method statements have been compiled by BA Developments Pty Ltd and approved by Sharples Environmental Services CC.</p> <p>Based on the specifications in the approved EMP, the following method statements are likely to be required as a minimum (more method statements may be requested as required at any time under the direction of the ECO):</p> <ul style="list-style-type: none"> - Site clearing (received); - Hazardous substances declaration of use; - Cement and concrete batching (received); - Traffic accommodation (if necessary); - Solid waste control system (received); - Wastewater / stormwater control system; - Erosion remediation and stabilisation (received); - Fire control and emergency procedures; - Petroleum, chemical, harmful and hazardous materials (received); and - Alien vegetation-clearing programme (received). <p>Recommendation: The Contractor shall prepare method statements for specific construction activities and/or environmental management aspects in addition to what has been submitted, if deemed necessary by the Engineer and/or ECO.</p>
	<p>Method statements must be submitted at least five (5) days prior to the date on which approval is required (start of the activity). Failure to submit a method statement may result in suspension of the activity concerned until such time as a method statement has been submitted and approved.</p>	<p>0.5</p>	<p>Partial Compliance</p> <p>Method statements were submitted to the Auditor following the site inspection. Method statements have been compiled by BA Developments Pty Ltd and approved by Sharples Environmental Services CC.</p> <p>Method statements have been provided to the contractor, however this was not undertaken 5 days prior to the start of the activity.</p>

OPERATIONAL REQUIREMENTS
Does not form part of this audit.

The EMPr has been deemed effective and has been successfully implemented despite changes in ownership and the initial absence of an ECO. However, a shortcoming was identified when a stormwater structure was constructed outside the boundary of Erf 195/52, resulting in non-compliance with condition 5.5 of the EMPr. Since this structure benefits both Erf 23997, Erf 195/52, and the George Municipality, it is recommended that the EMPr be amended to incorporate the position of the stormwater outlet. This amendment would resolve the identified non-compliance.

6. PHOTOGRAPHIC RECORD (2024/02/13)



7. RECOMMENDATIONS

The following recommendations are made based on the partial compliance and non-compliance to the EA and EMPr conditions, as well as findings by the ECO in the Environmental Monitoring Reports:

1. The public walkway must form part of the servitude road. The walkway must be built before transferring it to the Municipality.
2. The 7 small private Open Spaces must form a corridor within and through the dwelling layout towards the large open space to the south.
3. Environmental induction should be undertaken prior to commencement of Phase 3 and again for Phase 4.
4. According to the EMPr the clearance of alien vegetation must be completed before construction activities begin. Therefore, a team of workers must be assembled to clear all alien vegetation by hand. This should ideally be completed before construction of Phase 3 and 4 commences.
5. The pedestrian and /or cycle route must be determined with input from the ECO, Engineer, George Municipality, and adjacent landowners. The pedestrian and /or cycle path must be incorporated into the landscape plan.
6. The boundary of the Open Space area to the south must be determined and demarcated appropriately, as approved by the ECO.
7. The no-go areas must be properly demarcated and the concrete spillage on site must be disposed of. Concrete mixing areas must have bund walls or a settling pond to prevent cement run off.
8. The Contractor shall ensure that sufficient disposal facilities are available. Recycling must be encouraged on site and recycling bins must be provided at the contractor's camp and clearly marked.
9. It is recommended that the road on the western boundary be removed to the point that reflects the correct alignment as per the approved SDP, and rehabilitated. The servitude road should be surveyed to mark on the ground the exact position/alignment.
10. The stormwater outlet structure is built outside the boundary of erf 195/52, and therefore remains a non-compliance. However, as it benefits both erf 23997, erf 195/52, and the George Municipality, it is recommended that the EMPr be amended to incorporate the position of the stormwater outlet.

In addition to the recommendations to remediate non – and partial compliances, the following recommendations were made throughout the audit report to bring amendments to the EA and the EMPr.

Amendments to the Environmental Authorisation (EA)		
Condition No.	Current	Amendment
"the Holder"	The Environmental Authorisation (EA) Reference: 16/3/11/D2/19-0025/12 issued on 01 August 2013 was issued to Glen Haven Country Estate (Pty) Ltd and not Bluerain Property Group (Pty) Ltd. This Directorate has yet to receive an application for amendment to	A Part 1 Amendment will be submitted to DEA&DP for change of the holder of the EA.

	change the details of the holder of the EA. In light thereof, Glen Haven Country Estate (Pty) Ltd remains the responsible party to ensure compliance with the EA.	
6	Any changes to, or deviations from the scope of the description set out in section B above must be accepted or approved, in writing, by the competent authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the competent authority may request such information as it deems necessary 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.	A Part 1 Amendment will be submitted to DEA&DP for rezoning to allow Estate housing and public street instead of the Retirement Resort.
Amendments to the Environmental Management Programme		
5.5	Any formal stormwater infrastructure must ensure that discharge points must be contained within the property boundaries of Portion 52/195 and are designed in such a way as to negate erosion.	The stormwater structure is built outside the boundary of erf 195/52, and therefore remains a non-compliance. However, as it benefits both erf 23997, erf 195/52, and the George Municipality, it is recommended that the EMPr be amended to incorporate the position of the stormwater outlet.

8. CONCLUSION

According to the ECO's Environmental Monitoring Reports, the general compliance of the construction site is good, and no significant avoidable impacts were noted to the environment. The partial- and non-compliance issues were generally associated with administration or common issues arising from construction sites such as cement, waste management and demarcations. However more major non-compliance issues such as the stormwater outlet may be addressed through an Application for Amendment to the EA and EMPr through the competent authority. The road constructed along the western boundary remains a concern and must be dealt with to ensure that protection and restoration of the Open Space Area is implemented.

The new developer/owner is taking steps to correct compliance issues that have been identified since the appointment of the ECO. It is important that the EA be amended to the new owner's name so that the EA holder can take responsibility for ensuring compliance.

The following is a visual representation of the compliance that was found against the EA and the EMPr –

