

First Annual External Environmental Audit Report

**Development of a small beachfront estate (9 residential stands) with
some designated Open Space on Portions 66 and 67 of Farm 443,
Plettenberg Bay**

Development Phase: Civil construction completed

EIA Reference Number: 16/3/3/1/D1/14/0028/22

NEAS REFERENCE: WCP/EIA/0001187/2022

Submitted: 16-05-2025



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DECLARATION OF INDEPENDENCE

I consider myself bound to the rules and ethics of the Environmental Assessment Practitioners Association of South Africa (EAPASA).

I act as an independent practitioner in this application.

I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant.

I declare that there are no circumstances that may compromise my objectivity in performing such work.

At the time of conducting the study and compiling this report I did not have any interest, hidden or otherwise, in the development that this study has reference to, except for financial compensation for work done in a professional capacity.

I do not have any influence over decisions made by the governing authorities.

I undertake to disclose all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by a competent authority to such a relevant authority and the applicant.

This document and all information contained herein is and will remain the intellectual property of Maretha Alant. This document, in its entirety or any portion thereof, may not be altered in any manner or form, for any purpose without the specific and written consent of the author.

All the particulars furnished by me in this document are true and correct.



Maretha Alant

EAPASA Registration Number 2022/5417

Qualifications: M.Phil. Environmental Science (University of Cape Town, 1996)

Expertise: >27 years of experience in Integrated Environmental Management, in various private and public sectors. Maretha has reviewed >1000 development proposals within National Parks (particularly in the buffer zones of the South African National Parks (SANParks) Garden Route National Park (GRNP) and Frontier Regions), and facilitated Environmental Control Officer (ECO) training workshops. Maretha is highly skilled in landscape functionality and connectivity, as a climate change adaptation and resilience strategy.

DOCUMENT CONTROL

REFERENCE	REVISION	DATE	AUTHOR
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APPROVAL FOR RELEASE

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Note: This first annual Environmental Audit Report will be uploaded onto the Eco Route Environmental Consultancy website and Eco Route will notify all potential and registered interested and affected parties within 7 days of the date of submission to the competent authority.

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Appendix 3: Amended EMPr

Appendix 4: Auditor CV

Appendix 5: Landscape Plan

Appendix 6: Report prepared by P.M. Burgoyne of Octoplasm Botanicals 21 August 2024

CONTENT OF AN ENVIRONMENTAL AUDIT REPORT

This audit report is submitted in terms of Regulation 34 of GN R. 982 of the 2014 EIA Regulations as amended. Appendix 7 of Regulation 982 contains the required contents of an Environmental Audit Report. The checklist below serves as a summary of how these requirements were incorporated into this Audit Report.

(1) An Environmental audit report prepared in terms of these Regulations must contain -

Requirement	Description
Details of – The independent person who prepared the environmental audit report; and the expertise of the independent person that compiled the environmental audit report.	The report has been prepared by Maretha Alant, EAPASA Registration Number 2022/5417 Qualifications: M.Phil. Environmental Science (University of Cape Town, 1996) Expertise: >27 years of experience in Integrated Environmental Management, in various private and public sectors. Maretha has reviewed >1000 development proposals within National Parks (particularly in the buffer zones of SANParks Garden Route National Park (GRNP) and Frontier Regions), and facilitated Environmental Control Officer (ECO) training workshops. Maretha is highly skilled in landscape functionality as a climate change adaptation and resilience strategy. (Appendix 4: Auditor CV).
A declaration that the auditor is independent.	As stated upfront in the report.
An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	This External Environmental Audit report monitors compliance against: (1) the EA conditions as granted 31 July 2023 (REF: 16/3/3/1/D1/14/0028/22) as it relates to completion of the Civil Construction Phase. The EA was amended (Amendment EA Ref: 16/3/3/5/D1/14/0007/24) on 14 June 2024 for a new Site Development Plan (SDP). (2) the Amended EMPr dated 31 July 2023 as it relates to completion of the Civil Construction Phase and (3) evaluates findings of the ECO Reports. ECO Reports dated April 2024, May 2024, June 2024, July 2024, August 2024, September 2024, October 2024, November 2024, January 2025 and February 2025 were reviewed to provide background information.
A description of the methodology adopted in preparing the environmental audit report.	Refer to Section 2.1.
An indication of the ability of the EA and EMPr to –	Refer to Sections 3 and 5. The conditions of the EA, EA Amendment and Amended EMPr were complied with. The ECOs and the Holder

<ul style="list-style-type: none"> - Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis; - Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and - Ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan. 	<p>of the EA strived to avoid negative environmental impacts.</p>
<p>A description of any assumptions made, and any uncertainties or gaps in knowledge.</p>	<p>No known knowledge gaps. Refer to Section 1.1 for Assumptions and Limitations.</p>
<p>A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.</p>	<p>This first annual Environmental Audit Report will be uploaded onto the Eco Route Environmental Consultancy website and Eco Route will notify all potential and registered interested and affected parties within 7 days of the date of submission to the competent authority.</p>
<p>A summary and copies of any comments that were received during any consultation process.</p>	<p>Not Applicable as consultation has not yet taken place.</p>
<p>Any other information requested by the competent authority.</p>	<p>Not Applicable as no other information was requested by competent authority to date.</p>

Table 1 Content of an Environmental Audit

Environmental auditing requirements were stipulated in the EA in Conditions 16, 17, 18 and 19 and in Section 7.2 of the Amended EMPr dated 23/08/2023. These requirements were addressed in this annual audit and evaluated in Section 3 and 5.

1. INTRODUCTION

A Basic Assessment Report (BAR), inclusive of an Environmental Management Programme Report (EMPr) was prepared by Eco Route Environmental Consultancy and submitted to the Department of Environmental Affairs and Development Planning (DEADP). An Environmental Authorisation (EA) was granted, for the construction of 9 residential units with some designated open space on the property known as Portions 66 and 77 of Farm 443, Plettenberg Bay, on the 31 July 2023 (REF: 16/3/3/1/D1/14/0028/22). The EA was amended (Amendment EA Ref: 16/3/3/5/D1/14/0007/24) on 14 June 2024 for a new Site Development Plan (SDP).

Experienced Environmental Control Officers (ECOs) Eco Route Environmental Consultancy were appointed for compliance monitoring of the development (EA Conditions 10, 12 and 13). The Environmental Monitoring and Checklist Report, dated February 2025, dealt with the Completion of the Civil Construction phase. Conclusions of this Report:

- All civil works and the construction of the gatehouse have been completed.
- Site is neat and tidy. All construction equipment and material have been removed.
- Rehabilitation of previously disturbed areas, and landscaping of communal areas have been done.
- ECO is satisfied with site.
- Client to keep monitoring and restricting access into no-go areas and to please make all visitors aware of environmental restrictions and sensitivities on entrance of estate.

Ms. Maretha Alant was appointed by Athina Development (PTY) Ltd, represented by Mr Kyle Powter to undertake the first External Environmental Audit, as required in terms of the EA (Conditions 16, 17 and 18) and Section 7.2 of the Amended EMPr. Condition 18.1 states that an independent person with the relevant environmental auditing experience, that is not the ECO or EAP, must prepare and submit the Environmental Audit Report.

The project phase is completion of civil construction and ongoing landscaping and rehabilitation of the open space areas. Currently there are no containers or construction equipment on site and development of residential units has not yet commenced.

Key project timelines are as follows:

1. Environmental Authorisation (EA) granted (REF: 16/3/3/1/D1/14/0028/22) on 31 July 2023 for the proposed 9 residential units, with some designated open space on the property known as Portion 66 & 67 of Farm 443, Plettenberg Bay.
2. All I&AP were notified via email on the 1st of August 2023 of the Approval of the Environmental Authorisation (16/3/3/1/D1/14/0028/22). The fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) was included.
3. EA Condition 10.1 requested an amendment of the EMPr. The Amended EMPr is dated 23/08/2023. Approval of the EMPr was granted on 28/11/2023.
4. Eco Route Environmental Consultancy was appointed as the ECOs in February 2023.
5. Commencement of construction: The internal stripping of the building commenced 23 May 2024. The demolition of the building commenced 10 June 2024. Construction started in the week of 8 July 2024.
6. Amendment of EA (Amendment EA Ref: 16/3/3/5/D1/14/0007/24) dated 14 June 2024. New Site Development Plan (SDP) approved.
7. Notification of Amendment of the Environmental Authorisation emailed to I&APs on 18 June 2024. No appeals received.

8. ECO reports were compiled by Eco Route Environmental Consultancy for March to May 2024 by Justin Brittion (Candidate 2023/6648) and reviewed by Joclyn Marshall (2022/5006) and thereafter from June 2024 to February 2025 by Lizelle Genade (2023/7793) of Blue Pebble. Blue Pebble is a sister company of Eco Route Environmental Consultancy. This document will refer to the ECOs as Eco Route Environmental Consultancy.
9. The Rehab Destruction Report, prepared by P.M. Burgoyne of Octoplasm Botanicals: 21 August 2024. Interventions were implemented.
10. Completion of Civil Construction phase: ECO Report dated February 2025.
11. Auditor site visits: 17 March 2025 with Eco Route representatives for a site overview and 1 May 2025 after a rain event to investigate storm water management and for a detailed inspection of the site.
12. Planned Completion of construction: 31 July 2028.

Environmental auditing requirements

Environmental auditing requirements were stipulated in the EA in Conditions 16, 17, 18 and 19 and in Section 7.2 of the Amended EMPr.

Environmental Auditing

16. The Holder must, for the period during which the environmental authorisation and EMPr remain valid ensure the compliance with the conditions of the environmental authorisation and the EMPr, is audited.

17. The frequency of auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr, must adhere to the following programme:

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

17.1.1. During the period which the development activities have been commenced with on the site, the Holder must ensure annual environmental audit(s) are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority.

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

18. The Environmental Audit Report(s), must–

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Department of Environmental Affairs and Development Planning | Directorate: Development Management (Region 3)

18.1. be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise. Such person may not be the ECO or EAP who conducted the EIA process;

Extract from EA granted 31 July 2023

- 18.2. provide verifiable findings, in a structured and systematic manner, on–
 - 18.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and
 - 18.2.2. the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.
 - 18.3. identify and assess any new impacts and risks as a result of undertaking the activity;
 - 18.4. evaluate the effectiveness of the EMPr;
 - 18.5. identify shortcomings in the EMPr;
 - 18.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;
 - 18.7. indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;
 - 18.8. indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation;
 - 18.9. include a photographic record of the site(s) applicable to the audit; and
 - 18.10. be informed by the ECO reports.
19. The Holder must, within 7 calendar days of the submission of the audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable).

Extract from EA granted 31 July 2023

The Amended EMPr, page 48, provided the terms of reference for the audits to comprise the following:

- Develop a checklist against which the criteria can be referenced during the audit.
- During the audit process, key individuals involved with the management of the project are to be given the opportunity to comment on issues being audited and will be invited to accompany the auditor during the site inspection.
- Compile an audit report on the implementation of the EMPr and compliance to the Environmental Authorisation and submit this report to the competent authority (DEA&DP).

1.1 Assumptions and Limitations

The following assumptions and limitations are provided:

- The information used to draw up this report is assumed to be factual, accurate and truthful;
- External reports used to consider impacts are taken at value; and
- It is assumed that the holder of the EA and project team made available all information relating to the project and its management protocols.

1.2 Background Information

The EA is for the development of a small exclusive beachfront security estate on Portion 66 and 67 of Farm 443, Plettenberg Bay consisting of 9 residential units with some designated open space. Portion 66 (16909.97m²) and 67 (8658.85m²) of Farm 443 measure ±2.56ha in total and is located along the coastal strip between the Beacon Isle Hotel and the Robberg Nature Reserve. The property can be accessed from the south via Robbeberg Bay Road.

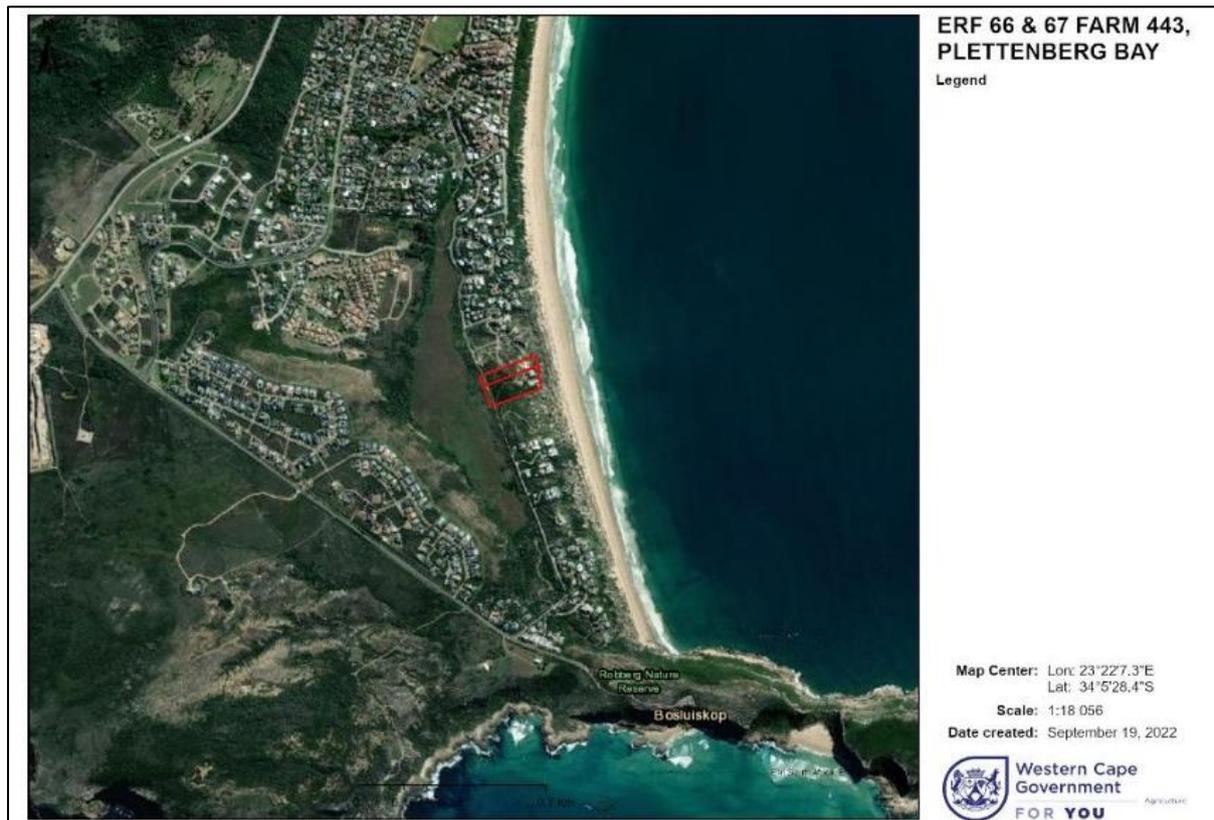


Figure 1. Locality Map

Coordinates of the site:		
Position:	Latitude (South)	Longitude (East)
Middle Point	34° 05' 24"	23° 22' 13"
SG digit code of Portion 66 of 443:	C03900000000044300066	
SG digit code of Portion 67 of 443:	C03900000000044300067	

The Amendment to the EA was granted on dated 14 June 2024. New Site Development Plan (SDP) approved.

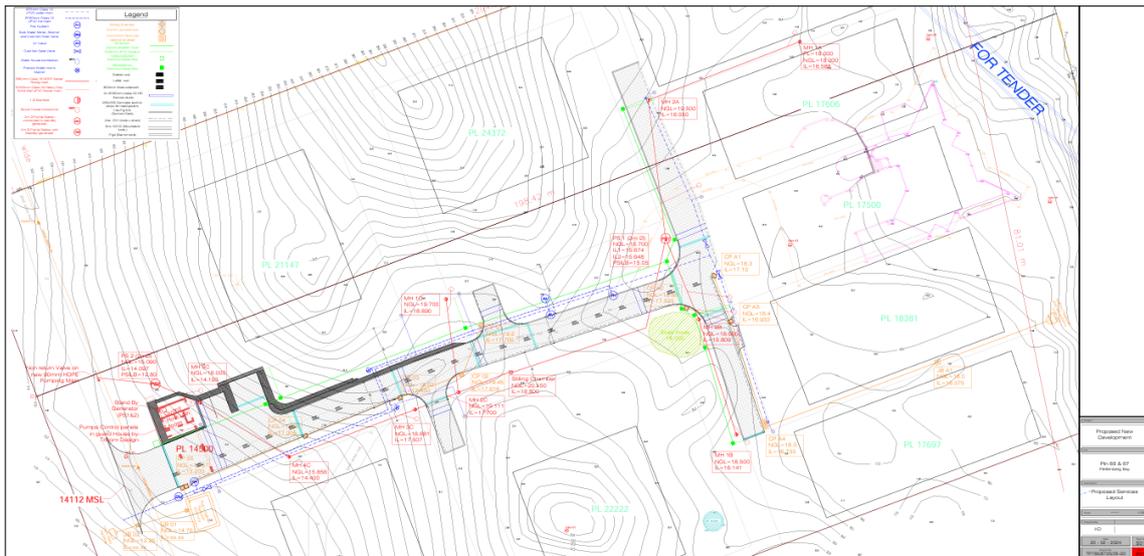


Figure 3. Services layout

Listed activities triggered

The following listed activities, in terms of the Environmental Impact Assessment Regulations (2014, as amended) were triggered by the proposed development.

- Listing Notice 1 (Government Notice No. 983 of 4 December 2014, as amended), Activity Number 17, 19A and 27 and
- Listing Notice 3 (Government Notice No. 985 of 4 December 2014, as amended) Activity Number 4 and 12.

Listed Activities	Activity/Project Description
<p>Environmental Impact Assessment Regulations Listing Notice 1 of 2014, Government Notice No. 983 of 4 December 2014, as amended.</p>	
<p>Activity Number: 17 Activity Description:</p> <p>Development—</p> <ul style="list-style-type: none"> (i) in the sea; (ii) in an estuary; (iii) within the littoral active zone; (iv) in front of a development setback; or (v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater; <p>in respect of—</p> <ul style="list-style-type: none"> (a) fixed or floating jetties and slipways; (b) tidal pools; (c) embankments; (d) rock revetments or stabilising structures including stabilising walls; or (e) infrastructure or structures with a development footprint of 50 square metres or more — <p>but excluding—</p> <ul style="list-style-type: none"> (aa) the development of infrastructure and structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; 	<p>The development of structures and associated infrastructure of more than 50m² within 100 metres from the high-water mark of the sea and within the littoral active zone.</p>

Extract from EA granted 31 July 2023

<p>Activity Number: 19A Activity Description:</p> <p>The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from—</p> <p>(i) the seashore; (ii) the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or (iii) the sea; —</p> <p>but excluding where such infilling, depositing, dredging, excavation, removal or moving—</p> <p>(a) will occur behind a development setback; (b) is for maintenance purposes undertaken in accordance with a maintenance management plan; (c) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or (e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.</p>	<p>The infilling and excavation of sand of more than 5m³ within 100 metres from the high-water mark of the sea and within the littoral active zone for the development of the residential estate.</p>
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Extract from EA granted 31 July 2023

<p>Activity Number: 27 Activity Description:</p> <p>The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for—</p> <p>(aa) the undertaking of a linear activity; or (bb) maintenance purposes undertaken in accordance with a maintenance management plan.</p>	<p>The clearance of more than 1 ha of indigenous vegetation for the development of a residential estate.</p>
<p>Environmental Impact Assessment Regulations Listing Notice 3 of 2014, Government Notice No. 985 of 4 December 2014, as amended.</p>	
<p>Activity Number: 4 Activity Description:</p> <p>The development of a road wider than 4 metres with a reserve less than 13,5 metres.</p> <p>i. Western Cape</p> <p>i. Areas zoned for use as public open space or equivalent zoning; ii. Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or iii. Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.</p>	<p>The development of roads wider than 4 metres for the development of a residential estate.</p>

Extract from EA granted 31 July 2023

<p>Activity Number: 12 Activity Description:</p> <p><i>The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan</i></p> <p>i. Western Cape</p> <ol style="list-style-type: none"> i. <i>Within any critically endangered or endangered ecosystem listed in terms of section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered in the National Spatial Biodiversity Assessment 2004;</i> ii. <i>Within critical biodiversity areas identified in bioregional plans;</i> iii. <i>Within the littoral active zone or 100 metres inland from high water mark of the sea or an estuarine functional zone, whichever distance is the greater, excluding where such removal will occur behind the development setback line on erven in urban areas;</i> iv. <i>On land, where, at the time of the coming into effect of this Notice or thereafter such land was zoned open space, conservation or had an equivalent zoning; or</i> v. <i>On land designated for protection or conservation purposes in an Environmental Management Framework adopted in the prescribed manner, or a Spatial Development Framework adopted by the MEC or Minister.</i> 	<p>The clearance of more than 300m² Goukamma Dune Thicket within 100m metres from the high-water mark of the sea for the residential development and associated infrastructure.</p>
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Extract from EA granted 31 July 2023

Current condition on site based on environmental auditor site visit on 17 March 2025 and 1 May 2025

Current condition on site, based on observations made by auditor at site inspections, are provided below for background information. A photographic record based on audit findings as it relates to EA and EMP conditions is provided in Section 4 of this document.

- Guardhouse and entrance gate completed.
- Internal access road completed.
- Perimeter 1,8m high Clearvu fence and security cameras installed with 2 gates to 6m wide conservation corridor (at frontal dune and footpath).
- The conservation corridor is unfenced on the eastern and western boundaries.
- Stormwater management structures completed.
- Water tanks in place.
- Civil services in place.
- Frontal dune conservation area free from alien vegetation.
- Landscaping in progress and erven ready for development.
- Passive rehabilitation of 6m wide conservation corridor in progress.
- There is a booster pump at the guardhouse for firefighting and the Holder of the EA is a member of the Southern Cape Fire Protection Association (FPA).



Guardhouse and entrance gate completed



Internal access road completed



Perimeter 1,8m high Clearvu fence, security cameras/system and gate to conservation corridor at frontal dune



Perimeter 1,8m high Clearvu fence, security cameras/system and gate at footpath to conservation corridor



Stormwater management structure completed and functional



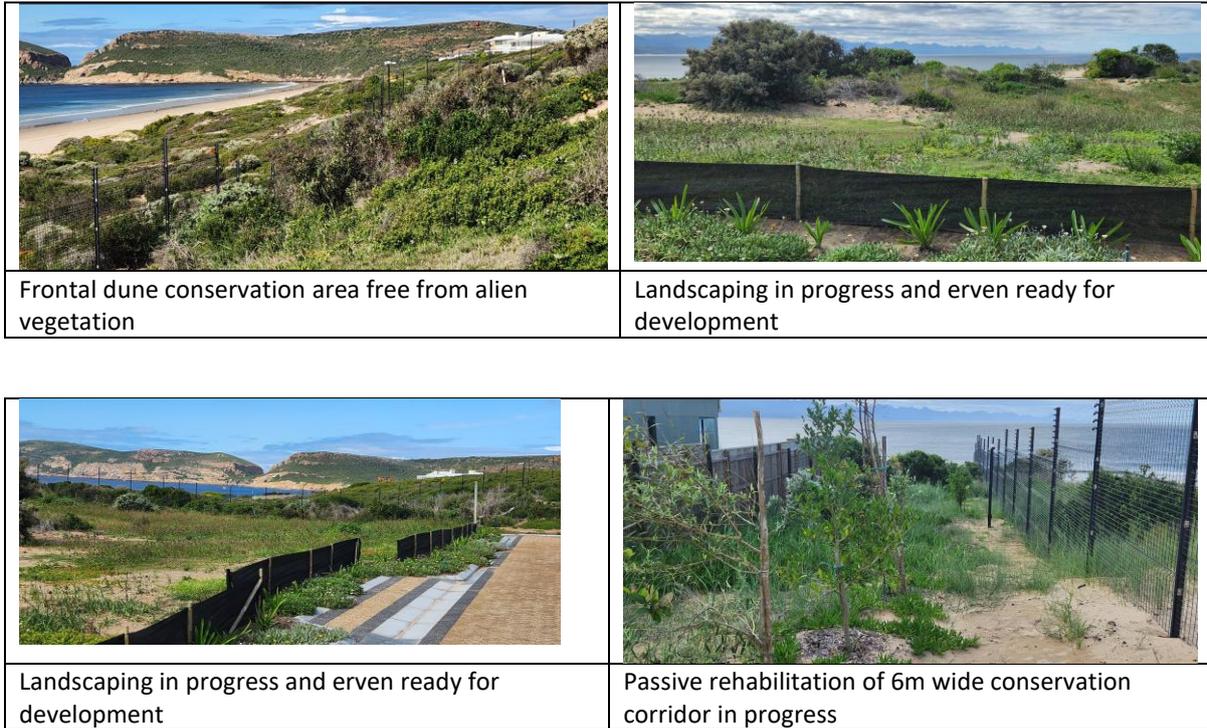
Stormwater management structures close to wetland completed and functional



Water tanks in place



Civil services in place



2 REPORTING REQUIREMENTS

2.1 Methodology

This first annual audit report was undertaken by considering the conditions of the EA, the Amended EMPr and the Amendment of the EA to evaluate whether or not the holder of the EA complied with the requirements.

ECO reports were reviewed for background information and compliance regarding demolition, earthworks, removal of alien invasive plant species, method statements, environmental induction, indigenous plants rescue, protection of Milkwood trees, site management, waste management, road upgrade, storage and stockpiling, erosion and stormwater control, safety and security, topsoil management, fire management, rehabilitation, landscaping and other activities that took place over the past year.

Environmental audit site inspection took place on 17 March 2025 and 1 May 2025.

As a quick reference, compliant is highlighted in green, non compliant is highlighted in red and not applicable is highlighted in yellow.

Compliant	Fully compliant with condition.
Non compliant	Does not comply and requires urgent attention.
Not Applicable	Condition does not apply or cannot be complied with as the action has not yet taken place or cannot be assessed.

2.2 Consultation Process

As per Section 34(6) of the 2014 EIA Regulations, as amended, a public consultation process is required for an Environmental Audit Report. Section 34(6) states that within 7 days of the date of submission of an environmental audit report to the competent authority, the holder of an environmental authorisation must notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available—

(a) to anyone on request; and

(b) on a publicly accessible website, where the holder has such a website.

This first annual Environmental Audit Report will be uploaded onto the Eco Route Environmental Consultancy website and Eco Route will notify all potential and registered interested and affected parties within 7 days of the date of submission to the competent authority.

3 ENVIRONMENTAL COMPLIANCE EVALUATION

3.1 Environmental Authorisation

Conditions have been categorized according to their grouping in the EA. There are 34 applicable conditions within these categories, as follows:

Category	Number of conditions
Scope and Validity Period of authorisation	6
Notification and administration of appeal	3
Written notice to the Competent Authority	2
Management of activity	2
Monitoring	4
Environmental Auditing	4
Specific Conditions	3
General matters	10

No	Condition of Authorisation	Compliance Rating	Comment
	Scope and Validity Period of authorisation of authorisation		
1.	This Environmental Authorisation is granted for the period from date of issue until 31 July 2028, during which period the Holder must ensure that the— (a) physical implementation of all the authorised listed activities is started with and concluded at the site; (b) construction monitoring and reporting requirements are undertaken at the site and submitted to the Competent Authority in time to allow said authority to process such documents timeously; (c) post	Compliant	(a) Physical implementation has commenced. Civil construction phase has been completed. The construction of dwellings still has to commence. (b) ECO reports were submitted to DEADP as required. (c) Rehabilitation and landscaping have commenced. (d) This first annual environmental audit report will be submitted to DEADP.

	construction rehabilitation and monitoring requirements is undertaken and completed at the site; and (d) environmental auditing requirements are complied with; and that such auditing is finalised in time to allow the competent authority to be able to process the environmental audits timeously within the specified validity period.		
2.	The construction phase of the Environmental Authorisation is subject to the following: 2.1 The Holder must finalise the post construction rehabilitation and monitoring requirements within a period of 3-months from the date the development activity (construction phase) is concluded.	Not Applicable	Construction phase has not been completed. Civil Services and the internal road were constructed but construction of dwellings have not started. Development has not been concluded. Rehabilitation has commenced.
3.	The Holder is authorised to undertake the listed activities specified in Section B above in accordance with the Preferred Alternative described in the FBAR dated 5 April 2023 on the site as described in Section C above. This Environmental Authorisation is only for the implementation of the Preferred Alternative which entails: The Holder is herein authorised to undertake the following activities that includes the listed activities as it relates to the development of structures and infrastructure within 100 metres of the high-water mark of the sea and the littoral active zone, the clearance of indigenous vegetation of more than 300m ² , development of roads wider than 4 metres and the excavation of more than 5m ³ of sand within 100 metres of the high-water mark of the sea and littoral active zone for the development of a small beachfront estate (9 residential stands) on Portion 66 and 67 of the Farm 443. The development must be implemented in accordance with the layout developed by Objek Architects (dated 16/06/2022) Drawing number 10_02 (Annexure 2).	Compliant	The EA was amended and a new SDP approved. Amendment EA Ref: 16/3/3/5/D1/14/0007/24) dated 14 June 2024. Authorised listed activities commenced.
4.	This Environmental Authorisation may only be implemented in accordance with an approved Environmental Management Programme (“EMPr”).	Compliant	The approved Amended EMPr is being implemented. Refer to Section 3.2 below for details.
5.	The Holder shall be responsible for ensuring compliance with the conditions by any person acting on	Compliant	Based on the ECO Reports this condition was complied with. Environmental induction took place and the ECO

	his/her behalf, including an agent, sub-contractor, employee or any person rendering a service to the Holder.		conducted regular site inspections. Refer to Section 3.3 for a summary of findings from ECO Reports.
6.	Any changes to, or deviations from the scope of the alternative described in section B above must be accepted or approved, in writing, by the Competent Authority before such changes or deviations may be implemented. In assessing whether to grant such acceptance/approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the Holder to apply for further authorisation in terms of the applicable legislation.	Compliant	The EA was amended and a new SDP approved. Amendment EA Ref: 16/3/3/5/D1/14/0007/24) dated 14 June 2024.
	Notification and administration of appeal		
7.	The Holder must in writing, within 14 (fourteen) calendar days of the date of this decision– 7.1. notify all registered Interested and Affected Parties (“I&APs”) of – 7.1.1. the decision reached on the application; 7.1.2. the reasons for the decision as included in Annexure 3; 7.1.3. the date of the decision; and 7.1.4. the date when the decision was issued.	Compliant	EA granted 31 July 2023. (REF: 16/3/3/1/D1/14/0028/22): All I&AP were notified via email on the 1st of August 2023 of the Approval of the EA. Amendment of EA granted on 14 June 2024. (Amendment EA Ref: 16/3/3/5/D1/14/0007/24). All I&AP were notified via email on 18 June 2024. 7.1.1, 7.1.2, 7.1.3 and 7.1.4 was complied with.
	7.2. draw the attention of all registered I&APs to the fact that an appeal may be lodged against the decision in terms of the National Appeal Regulations, 2014 (as amended) detailed in Section G below;	Compliant	7.2 was complied with in the notices emailed to I&APs.
	7.3. draw the attention of all registered I&APs to the manner in which they may access the decision;	Compliant	7.3 was complied with in the notices emailed to I&APs.
	7.4. provide the registered I&APs with the: 7.4.1. name of the Holder (entity) of this Environmental Authorisation, 7.4.2. name of the responsible person for this Environmental Authorisation, 7.4.3. postal address of the Holder, 7.4.4. telephonic and fax details of the Holder, 7.4.5. e-mail address, if any, of the Holder, 7.4.6. contact details (postal and/or physical address, contact number, facsimile and e-mail address) of the decision-maker and all registered	Compliant	7.4 was complied with in the notices emailed to I&APs.

	I&APs in the event that an appeal is lodged in terms of the 2014 National Appeals Regulations (as amended).		
	7.5. 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	EA was granted 31 July 2023 and I&APs notified on 1 August 2023. The internal stripping of the building commenced 23 May 2024. The demolition of the building commenced 10 June 2024. Construction started in the week of 8 July 2024. Construction started more than 20 (twenty) calendar days from the date the I&APs were notified.
	7.6. In the event that an appeal is lodged with the Appeal Authority, the effect of this Environmental Authorisation is suspended until the appeal is decided (i.e., the listed activities), including site preparation, must not commence until the appeal is decided.	Not Applicable	No appeals were lodged.
	Written notice to the Competent Authority		
8.	Seven calendar days' notice, in writing, must be given to the Competent Authority before commencement of any activities. 8.1. The notice must make clear reference to the site details and EIA Reference number given above. 8.2. The notice must also include proof of compliance with the following conditions described herein: Conditions no.: 7, 10 and 12.	Compliant	Seven calendar days' notice, in writing, was sent on the 16 th of January 2024 to DEADP with all relevant information required.
9.	Seven calendar days' written notice must be given to the Competent Authority on <u>completion</u> of the construction activities.	Not Applicable	Civil construction phase and internal road completed. Dwellings still to be developed.
	Management of activity		
10.	The draft or Environmental Management Programme ("EMPr") submitted as part of the application for Environmental Authorisation must be amended and submitted to this Department for approval, at least 90-days prior to commencement of any activities on the site: 10.1. The EMPr must be amended to incorporate the following — 10.1.1. Incorporate all the conditions given in this Environmental Authorisation; 10.1.2. The ECO must conduct site inspections every two weeks during the construction phase (The frequency may be increased to weekly site inspections).	Compliant	10.1. The approved Amended EMPr dated 23/08/2023 incorporated the conditions requested by DEADP in red. Approval of the EMPr was granted on 28/11/2023. Refer to Section 3.2 regarding compliance with the Amended EMPr and Section 3.3 for details regarding ECO Reports submitted to DEADP.

	<p>10.1.3. All ECO monitoring reports compiled monthly during the construction phase must be submitted to the competent authority quarterly (every three months), except when there is non-compliance observed, in which case the ECO must bring to the competent authority's immediate attention by means of a written report.</p> <p>10.1.4. The ECO must conduct site inspections every two weeks during the rehabilitation phase and submit the ECO monitoring reports during this phase monthly.</p> <p>10.1.5. Include the auditing schedule as set out by this Environmental Authorisation.</p>		
11.	The EMPr must be included in all contract documentation for all phases of implementation.	Compliant	The Holder of the EA and ECO confirmed that the EMPr was included in contract documentation for the project to date.
	Monitoring		
12.	The Holder must appoint a suitably experienced Environmental Control Officer ("ECO"), for the duration of the construction and rehabilitation phases of implementation contained herein.	Compliant	Eco Route Environmental Consultancy was appointed the ECO for the project.
13.	<p>The ECO must–</p> <p>13.1. be appointed prior to commencement of any works (i.e. removal and movement of soil);</p> <p>13.2. ensure compliance with the EMPr and the conditions contained herein;</p> <p>13.3. keep record of all activities on the site; problems identified; transgressions noted and a task schedule of tasks undertaken by the ECO;</p> <p>13.4. remain employed until all development activities are concluded, and the post construction rehabilitation and monitoring requirements are finalised; and</p> <p>13.5. the ECO must conduct site inspections at least every 2 (two) weeks and must submit ECO Monitoring Reports on a monthly basis to the competent authority.</p>	Compliant	<p>Conditions 13,1, 13,2 and 13.3 and 13.5 is complaint to date. Eco Route Environmental Consultancy was appointed the ECO for demolition, civil construction of services and related rehabilitation.</p> <p>13.4 cannot be audited as development is not concluded.</p> <p>Eco Route Environmental Consultancy remains the ECO for this project.</p>
14.	A copy of the Environmental Authorisation, EMPr, any independent assessments of financial provision for rehabilitation and environmental liability, closure plans, audit reports and compliance monitoring reports must be kept at the site of the	Compliant	The environmental file is available at the gate house and the security guard is aware of the file.

	authorised activities and be made available to anyone on request, and where the Holder has website, such documents must be made available on such publicly accessible website.		
15.	Access to the site referred to in Section C must be granted, and the environmental reports mentioned above must be produced, to any authorised official representing the Competent Authority who requests to see it for the purposes of assessing and/or monitoring compliance with the conditions contained herein.	Not Applicable	This condition cannot be audited as the auditor has no control regarding site visits of official representing the Competent Authority.
	Environmental Auditing		
16.	The Holder must, for the period during which the environmental authorisation and EMPr remain valid ensure the compliance with the conditions of the environmental authorisation and the EMPr, is audited.	Compliant	This Report is the first annual environmental audit.
17.	The frequency of auditing of compliance with the conditions of the environmental authorisation and of compliance with the EMPr, must adhere to the following programme: 17.1. Auditing during the non-operational phase (construction activities): 17.1.1. During the period which the development activities have been commenced with on the site, the Holder must ensure annual environmental audit(s) are undertaken and the Environmental Audit Report(s) submitted annually to the Competent Authority. 17.1.2. A final Environmental Audit Report for the construction phase (non-operational component) must be submitted to the Competent Authority within three (3) months of completion of the construction phase.	Compliant	This is the first annual environmental audit and complies with. Condition 17.1.1. Condition 17.1.2 cannot be audited as it pertains to the future.
18.	The Environmental Audit Report(s), must–		
	18.1. be prepared and submitted to the Competent Authority, by an independent person with the relevant environmental auditing expertise. Such person may not be the ECO or EAP who conducted the EIA process;	Compliant	18.1: The report was prepared by Maretha Alant, EAPASA Registration Number 2022/5417. Ms Alant was not the EAP or ECO.
	18.2. provide verifiable findings, in a structured and systematic manner, on–	Compliant	Refer to Section 3 and 5 for details on compliance.

	18.2.1. the level of compliance with the conditions of the environmental authorisation and the EMPr and whether this is sufficient or not; and 18.2.2. the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity.		18.2.1: The conditions of the EA and Amended EMPr was sufficient to mitigate negative impacts. Where impacts occurred, actions were taken to rectify. 18.2.2: Measures contained in the EMPr was satisfactory to avoid, manage or mitigate environmental impacts to date.
	18.3. identify and assess any new impacts and risks as a result of undertaking the activity;	Compliant	18.3: No new risks or new impacts have been identified.
	18.4. evaluate the effectiveness of the EMPr;	Compliant	18.4. The Amended EMPr is effective.
	18.5. identify shortcomings in the EMPr;	Compliant	18.5. No shortcomings in the EMPr were noticed.
	18.6. identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr;	Compliant	18.6. No substantial changes to the EMPr are required. Recommendation: Include fence maintenance in EMPr. Vegetation needs to be trimmed to ensure the electric fence is functional.
	18.7. indicate the date on which the construction work was commenced with and completed or in the case where the development is incomplete, the progress of the development and rehabilitation;	Compliant	18.7. Commencement of construction: The internal stripping of the building commenced 23 May 2024. The demolition of the building commenced 10 June 2024. Construction started in the week of 8 July 2024. The current situation is that civil services installation and internal roads were completed and landscaping and rehabilitation is in progress. No containers or construction equipment currently on site and no listed activities are being triggered. Development of dwellings to start when plots are sold (future).
	18.8. indicate the date on which the maintenance/ rehabilitation was commenced with and the progress of the rehabilitation;	Compliant	18.8. Rehabilitation commenced in August 2024. A Botanist was appointed and alien clearing and tree planting started in the 6m conservation corridor. Currently passive rehabilitation is taking place in conservation areas. The landscaper has made good progress with implementing the Landscape Plan. Rehabilitation on the site is satisfactory and is ongoing.
	18.9. include a photographic record of the site(s) applicable to the audit;	Compliant	A photographic record of the site applicable to the first annual audit is provided in Section 4.
	18.10. be informed by the ECO reports.	Compliant	18.10. ECO Reports were reviewed and findings recorded in Section 3.4 below.

19.	The Holder must, within 7 calendar days of the submission of the audit report to the Competent Authority, notify all potential and registered I&APs of the submission and make the report available to anyone on request and on a publicly accessible website (if applicable).	Not Applicable	Action to take place and cannot be audited. This first annual Environmental Audit Report will be uploaded onto the Eco Route Environmental Consultancy website and Eco Route will notify all potential and registered interested and affected parties within 7 days of the date of submission to the competent authority.
Specific Conditions			
20.	<p>20. The Holder must establish and maintain a six (6) metre wide ecological corridor along the northern boundary of the development. Further to this—</p> <p>20.1. The ecological corridor must be incorporated in the site development plan as a servitude for conservation purposes.</p> <p>20.2. The servitude / corridor must be rehabilitated and maintained with locally indigenous plant species and kept clear of alien invasive vegetation.</p> <p>20.3. No structures or infrastructure may be constructed in this servitude without authorisation. This ecological servitude must not be fenced on the eastern and western boundaries.</p>	Compliant	<p>A six (6) metre wide ecological corridor along the northern boundary of the development was established and fenced out of the development footprint.</p> <p>20.1. Ecological corridor reflected on Amended SDP but legend and colours missing (not ideal for easy reference).</p>  <p>20.2 Rescue and rehabilitation were undertaken by Pricilla Burgoyne of Octoplasm Botanicals at start up when services were being installed and planting started in the corridor. In August 2024 the Botanist found damage caused by the insertion of a pipe from the road. The situation was rectified and currently passive restoration is in progress and the corridor is functional. Alien vegetation was cleared and will be ongoing.</p> <p>20.3 The corridor is not fenced on the eastern and western boundaries and no structures or infrastructure is present.</p>
21.	The Holder must ensure the development provides the public unrestricted access to the coastal public property. A coastal access point should be established and maintained on the site.	Compliant	The walkway to the beach was started by Octoplasm Botanicals in 2024 but currently the focus is on maintaining the ecological corridor. The conservation corridor is unfenced at the eastern and western boundaries. Public access is possible. There is a small path starting at the eastern boundary but access is restricted in places along the route to the beach. This is a good thing as wildlife is currently using the corridor without disturbance from dogs or people. The public access should only be formally opened after construction of the dwellings to reduce poaching risks and

			interference by people walking dogs before rehabilitation has progressed.
22.	<p>Should any heritage remains be exposed during excavations or any other actions on the site(s), these must immediately be reported to the Provincial Heritage Resources Authority of the Western Cape, Heritage Western Cape. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from Heritage Western Cape. Heritage remains may only be disturbed by a suitably qualified heritage specialist working under a directive from the relevant Heritage Resources Authority.</p> <p>Heritage remains include meteorites, archaeological and/or paleontological remains (including fossil shells and trace fossils); coins; indigenous and/or colonial ceramics; any articles of value or antiquity; marine shell heaps; stone artefacts and bone remains; structures and other built features with heritage significance; rock art and rock engravings; shipwrecks; and/or graves or unmarked human burials including grave goods and/or associated burial material.</p>	Compliant	No heritage remains was reported.

No	Condition of Authorisation	Auditor Comment
F.	GENERAL MATTERS	
1.	Notwithstanding this Environmental Authorisation, the Holder must comply with any other statutory requirements that may be applicable when undertaking the listed activities.	<p>An OSCAER permit dated 8 February 2024 (Ref: 18/66&67/443/PB) was issued by Bitou Municipality for vegetation clearance and earthworks for the following activities:</p> <ul style="list-style-type: none"> i. Alien Invasive Plant removal ii. Demolition of derelict house iii. Installation of services iv. Construction of internal roads and parking bays v. Construction of perimeter fence vi. Construction of a guardhouse vii. Maintenance of footpaths <p>Additional OSCAER permits will be applied for when dwellings are being developed.</p>

		<p>A WUL was authorised dated 21 Aug 2023 (Ref: 02/K60G/CI/13424) in terms of:</p> <p>Section 21(c) of the Act for Impeding or diverting the flow of water in a water course; subject to the conditions set out in Appendices I and II.</p> <p>Section 21(i) of the Act for Altering the bed, banks, course or characteristics of a watercourse; subject to the conditions set out in Appendices I and II.</p>
	Amendment of Environmental Authorisation and EMPr	
2.	<p>If the Holder does not start with the authorised listed activity and conclude the activity within the period referred to in Section E, this Environmental Authorisation shall lapse for that activity, and a new application for Environmental Authorisation must be submitted to the relevant Competent Authority. If the Holder wishes to extend a validity period specified in the Environmental Authorisation, an application for amendment in this regard must be made to the relevant Competent Authority prior to the expiry date of such a period.</p> <p>Note: (a) Failure to lodge an application for amendment prior to the expiry of the validity period of the Environmental Authorisation will result in the lapsing of the Environmental Authorisation. (b) It is an offence in terms of Section 49A(1)(a) of NEMA for a person to commence with a listed activity if the competent authority has not granted an Environmental Authorisation for the undertaking of the activity.</p>	The activity commenced and civil services and internal roads was constructed.
3.	<p>The Holder is required to notify the Competent Authority where any detail with respect to the Environmental Authorisation must be amended, added, substituted, corrected, removed or updated. In assessing whether to amend or correct the EA, the Competent Authority may request 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.</p> <p>The onus is on the Holder to verify whether such changes to the environmental authorisation must be approved in writing by the relevant competent authority prior to the implementation thereof.</p> <p>Note: An environmental authorisation may be amended or replaced without following a procedural requirement contained in the Regulations if the purpose is to correct an error and the correction does not change the rights and duties of any person materially</p>	The intention to apply for another amendment in future was communicated to DEADP.
4.	The manner and frequency for updating the EMPr is as follows:	No need to amend the approved Amended EMPr.

	<p>(a) Any further amendments to the EMPr, other than those mentioned above, must be approved in writing by the relevant competent authority.</p> <p>(b) An application for amendment to the EMPr must be submitted to the Competent Authority if any amendments are to be made to the impact management outcomes of the EMPr. Such amendment(s) may only be implemented once the amended EMPr has been approved by the competent authority. The onus is however on the Holder to confirm the legislative process requirements for the above scenarios at that time.</p>	
5.	Where an amendment to the impact management outcomes of an EMPr is required before an environmental audit is required in terms of the environmental authorisation, an EMPr may be amended on application by the Holder of the environmental authorisation.	No amendments to the impact management outcomes of the EMPr required at this stage.
	Compliance with Environmental Authorisation and EMPr	
6.	Non-compliance with a condition of this environmental authorisation or EMPr is an offence in terms of Section 49A(1)(c) of the National Environmental Management Act, 1998 (Act no. 107 of 1998, as amended).	No Non-compliance was noticed on site visits on 17 March 2025 or 1 May 2025.
7.	<p>This Environmental Authorisation is granted for a set period from date of issue, during which period the listed activity must be commenced with and concluded, including the post construction rehabilitation; monitoring requirements and environmental auditing requirements which must be concluded.</p> <p>The validity period and conditions of the environmental authorisation has been structured to promote the effective administration of the environmental authorisation and guidance has been provided to ensure the compliance thereof within the validity period, for example the following milestones should not be missed:</p> <ul style="list-style-type: none"> • Failure to submit the revised EMPr to the Competent Authority at least 90-days prior to the construction activities commencing on site, may result in the competent authority not being able to process / review the revised EMPr prior to the intended date of commencement. • Failure to complete the post construction rehabilitation and monitoring requirements at least six months prior to expiry of the validity period of an environmental authorisation may result in the Holder not being able to comply with the environmental auditing requirements in time. • Failure to complete the final auditing requirements at least three months prior to expiry of the validity period of the environmental authorisation may result in the Holder not being able to comply with all the environmental auditing and reporting requirements and may result in the competent authority not being able to process the audit timeously. • Failure to lodge an application for amendment prior to the expiry of the validity period of the Environmental 	The project is currently within the permissible time frame.

	<p>Authorisation will result in the lapsing of the Environmental Authorisation.</p> <p>Note: It is advised that if any of the milestones as indicated above, might not be achieved, the Holder must consider extending the validity period through an amendment process.</p>	
8.	<p>This Environmental Authorisation is subject to compliance with all the peremptory conditions (i.e., 7, 10 and 12). Failure to comply with all the peremptory conditions prior to the physical implementation of the activities (including site preparation) will render the entire EA null and void. Such physical activities shall be regarded to fall outside the scope of the Environmental Authorisation and shall be viewed as an offence in terms of Section 49A(1)(a) of NEMA.</p>	The project is compliant at this stage.
9.	<p>In the event that the Environmental Authorisation should lapse, it is an offence in terms of Section 49A(1)(a) of NEMA for a person to commence with a listed activity, unless the competent authority has granted an Environmental Authorisation for the undertaking of the activity.</p>	Listed activities commenced on site and EA has not lapsed.
10.	<p>Offences in terms of the NEMA and the Environmental Impact Assessment Regulations, 2014, will render the offender liable for criminal prosecution.</p>	
G	APPEALS	No appeals have been lodged.

Compliance Evaluation of the EA: The 34 Conditions of the EA were audited. All conditions were Compliant or Not Applicable. The project is in the Civil Construction completion phase. Many actions still have to start when the 9 dwellings are being developed.

Compliance Evaluation of the Amended EA: The New SDP is being implemented satisfactory.

3.2 Environmental Management Programme

Section 10 of the Amended EMPr contains the management outcomes for Construction and Operations Phases. As this Environmental Audit is a snapshot of what is currently on site the ECO Reports were reviewed (EA Condition 18.10) before auditing the EMPr.

ECO Report Findings

ECO Reports dated April 2024, May 2024, June 2024, July 2024, August 2024, September 2024, October 2024, November 2024, January 2025 and February 2025 we reviewed. The Rehab Destruction Report dated 21/08/2024, prepared by P.M. Burgoyne of Octoplasm Botanicals was also reviewed.

ECO Report Dates	ECO Conclusion and Recommendations	Auditor Comments
<p>March and April 2024 (Combined into one (1) report, as monitoring started during a dormant phase).</p>	<p>Both demolition and construction activities have been postponed. During this time, Eco Route Environmental Consultancy has been appointed as Environmental Control Officer (ECO) prior to the removal of alien invasive plant species in accordance with the Environmental Management Programme (EMPr).</p>	<p>Satisfactory on-site environmental management reported by ECO.</p>

May 2024	Both demolition and construction activities have been postponed. The removal of alien invasive plant species is nearing completion. Some of the removed plant material requires chipping. Internal stripping of the building is being undertaken to the satisfaction of the ECO. No impacts on the surrounding environment have been noted.	Satisfactory on-site environmental management reported by ECO.
June 2024	Demolishing Phase. Demolition activities have commenced on site. Environmental induction was done on the 12th of June 2024 for the demolition staff. The ECO is satisfied that all authorisations are being adhered to.	Satisfactory on-site environmental management reported by ECO.
July 2024	Pre-Construction and Construction Phase. ECO is overall satisfied that EMPr is being complied with. Awaiting method statement, contingency plans in case of spill and MSDS sheets from Project Manager. Request have been sent. More secure barriers need to be erected to demarcate foredune and areas where construction is getting close to 6m servitude no-go area. No access allowed in these areas by anyone, for any reason. A more formal site camp will be established on completion of services installed and access road completed.	Some partial compliance reported by ECO. Nothing substantive.
August 2024	Pre-Construction and Construction Phase. ECO is overall satisfied that EMPr is being complied with. Awaiting method statement, contingency plans in case of spill and MSDS sheets from Project Manager. Request have been sent. A rehabilitated area was disturbed by earthworks for service installation. Barriers have been erected around whole site to ensure no more encroachment of earthworks into no-go areas. Waste management is a concern on site. Site in need of a lidded bin for domestic (food packaging waste), and a caged, lidded bin for recyclables. Machinery on site in good order. Boards are used to limit spills when machinery stationary. A Report has been received from Botanist regarding a disturbance of a rehabilitated area. The contractor has been asked to fence all sensitive areas to ensure no more disturbance occurs. ECO and Botanist meeting on site 28 August to ensure the fencing is sufficient.	Some partial compliance noted. A Report has been received from Botanist regarding a disturbance of the Conservation Servitude for the insertion of a pipe line not related to this development. Measures were put in place for corrective action. Issues resolved satisfactorily.
September 2024	Pre-Construction and Construction Phase. ECO is overall satisfied that EMPr is being complied with. Method statement have	Satisfactory on-site environmental management reported by ECO.

	<p>been received. No-go areas demarcated with netting and 6m protected servitude area currently being fenced. Lined lidded caged bin has been placed on site for waste management. Machinery on site in good order. No oil leaks observed. Project Manager must communicate with ECO regarding the next phase and advise when an induction is required for new contractors on site, to ensure all staff complies with authorizations in place.</p>	
October 2024	<p>Pre-Construction and Construction Phase. No-go areas demarcated with netting and 6m protected servitude area have been fenced, allowing a corridor for any fauna, without impact from development. Lined lidded caged bin has been placed on site for waste management. However, lid is never closed. Bins have not been emptied on a weekly basis. Waste is piling up and being blown onto site. Litter observed. Daily clean-up is required. Oil leak observed close to access road. Should vehicles leak oil, it needs to be removed from site immediately. Please monitor all vehicles and machinery on site daily. Project Manager must communicate with ECO regarding the next phase and advise when an induction is required for new contractors on site, to ensure all staff comply with authorizations in place.</p>	<p>Some partial compliance reported by ECO. Nothing substantive.</p>
November 2024	<p>Pre-Construction and Construction Phase. Service installation and internal access road has been completed Minimal material still being stored on site, ready for removal. Small amount of rubble and waste still on site. Overall site is relatively neat and tidy. The raised area on Robbeberg road is showing runoff, leading to erosion on the wetland side of the road. Contractor was made aware of this, and they will put measures in place to stabilize area and address stormwater runoff.</p>	<p>Drainage and erosion not an issue on estate site. However, runoff and erosion observed on Robbeberg road where road was raised. Measures were put in place to address the issue.</p>
January 2025	<p>Pre-Construction and Construction Phase. All civil works and the construction of the gatehouse have been completed Erosion and runoff from the raised access road into the wetland buffer area, have been addressed. After shaping and stabilizing area, using bio-jute and mulch, area was planted with indigenous vegetation which seems to be thriving. There are still some run-off from gatehouse just above embankment. Please ensure the runoff from the gatehouse and internal access</p>	<p>Auditor supports that Monitoring of site by ECO should decrease until such time as construction of the private dwellings commence.</p> <p>EA Condition 10.1.2. The ECO must conduct site inspections every two weeks during the construction phase (The frequency may be increased to weekly site inspections).</p>

	<p>road is diverted onto vegetation on Estate side of the road. Monitoring of site by ECO will decrease until such time as construction of the private dwellings commence.</p>	<p>Auditor Recommendation: Quarterly ECO site visits and ECO Reports until construction of the private dwellings commence.</p> <p>EA Condition 10.1.4. The ECO must conduct site inspections every two weeks during the rehabilitation phase and submit the ECO monitoring reports during this phase monthly.</p> <p>Currently no construction on site, only passive rehabilitation and landscaping/gardening. "No go areas" are adhered to by landscape team.</p> <p>The security guard has the cell number of the Holder of the EA and can call in case of fire, flooding or unauthorised access.</p> <p>Auditor Recommendation: Quarterly ECO site visits and ECO Reports until construction of the private dwellings commence.</p>
February 2025	<p>All civil works and the construction of the gatehouse have been completed. Site is neat and tidy. All construction equipment and material have been removed. Rehabilitation of previously disturbed areas, and landscaping of communal areas have been done. ECO is satisfied with site. Client to keep monitoring and restricting access into no-go areas and to please make all visitors aware of environmental restrictions and sensitivities on entrance of estate. OSCAE permits required for construction of private dwellings on stands, which would require further environmental monitoring.</p>	<p>Auditor observations:</p> <ul style="list-style-type: none"> • The new approved SDP is being implemented. • The environmental management on the site is satisfactory and compliant. • The rehabilitation of the 6m conservation corridor is satisfactory and compliant. <p>Auditor Recommendation: Quarterly ECO site visits and ECO Reports until construction of the private dwellings commence.</p>

The Summation of Rehab Destruction Report dated 21/08/2024, prepared by P.M. Burgoyne of Octoplasm Botanicals was also reviewed. Corrective actions were implemented satisfactory.

Compliance Evaluation of information provided in ECO Reports: The activity authorised is in progress and the Holder of the EA and contractors were compliant with the recommendations and conditions of the EA and EMPr based on the ECO Reports. Corrective actions were implemented where partial compliance, storm water issues and a pipeline in the conservation corridor, was noted. The site is currently professionally managed from an environmental management perspective.

Amended EMPr (Section 10.1) relevant to the first annual audit (Construction Phase and start of rehabilitation)

Amended EMPr page no	Activity	Management outcome relevant for this audit	Compliance rating	Auditor comment
57	Erosion and Stormwater Control	The site must be stabilised where necessary using available materials, where possible. It is recommended that exposed soils are covered with wood chips, and tree branches used to create berms. Any cut alien vegetation on site can be utilised for this purpose if it is without seed.	Compliant	Drainage and erosion not an issue at the moment. Civil services have been installed and the dune sand allows for easy drainage. Rehabilitation in progress.
58	Conservation of the Natural Environment	All alien invasive plant species must be continuously removed around the site.	Compliant	Alien clearing is ongoing.
59		Any area of natural habitat that is not required for the approved development should be conserved for small wildlife.	Compliant	Natural habitat is currently not being disturbed.
59	Landscape Connectivity	A six (6) metre wide ecological corridor along the northern boundary of the development must be establish and maintain. The 6m wide servitude serves as a minor corridor for smaller wildlife, linking the wetland to the west with the coastal dunes to the east. The servitude must not be disturbed during construction activities and be cleared of invasive alien plants.	Compliant	A six (6) metre wide ecological corridor along the northern boundary of the development was established and is being maintained.
59		The conservation servitude must not be disturbed during construction activities and be cleared of invasive alien plants.	Compliant	A pipeline was inserted in the conservation servitude but the Holder of the EA was not responsible. Corrective action was taken and currently passive rehabilitation is in progress.
59		The erection of perimeter fencing must exclude the eastern and western boundary of the corridor to allow for free movement of wildlife through the corridor.	Compliant	The eastern and western boundary of the corridor was not fenced.
59		Services (i.e., sewer line, pipeline, electrical cable etc.)	Compliant	Services was not inserted in the conservation corridor.

		must remain outside the west to east corridor.		
59	Foredune conservation	The primary dune system must be designated as a "No Go" area and no encroachment will be allowed	Compliant	Passive restoration is taking place at the foredune within the property boundaries.
60		The primary dune system at the beach front (mostly outside the properties) should not be disturbed during the construction or operational phases of the development. This is an important coastal habitat that should be conserved for biodiversity conservation, to prevent increased wind erosion and as a minor faunal corridor along the edge of the property. This area must be actively excluded from the developed area and must not suffer the dumping and other negative impacts that so often accompany building project.	Compliant	There is a fence in place to protect the coastal habitat outside the property from disturbance.
60		The invasive alien vegetation must be removed from the dunes to restore the fragmented areas along the dune. This must be done under the guidance of an Invasive Alien Plant Control Plan.	Compliant	Alien clearing is ongoing.
60	Waste Management	Littering on the site is forbidden and the site shall be cleared of litter at the end of each working day.	Compliant	The site is clear from litter.
10.2. Operational Phase				
63	Vegetation Rehabilitation – progressive rehabilitation must be carried out	All disturbed areas, or areas which have been disturbed for the purpose of the development, are to be re-vegetated. This will aid in preventing erosion within the site. A 100% indigenous planting plan must be adhered to in terms of all planting carried out on the site. Consultation must be made with a Botanical Specialist for a site-specific vegetation list.	Compliant	A Botanist was appointed and active rehabilitation took place. Currently passive restoration is in progress and doing well. An indigenous Plant list is available.
		Erosion prevention and control measures must be implemented. Organic mulch or sand bags must be used to	Compliant	Currently no signs of erosion present on site.

		contain all sediment and prevent erosion during rehabilitation.		
		All rehabilitated areas must be maintained through weekly inspections until an acceptable success rate has been achieved.	Compliant	Rehabilitated areas are being maintained and an acceptable success rate has been achieved. Satisfactory passive rehabilitation and landscaping in progress. No need for weekly inspections at this stage.
		Encroachment of invasive alien plants in this regard will need to be monitored on a regular basis to prevent re-infestation. This would need to be undertaken by the ECO or a designated specialist.	Compliant	Alien vegetation clearing is ongoing.
63	Landscaping	A Landscape consultant be appointed to recommend and implement the introduction of an indigenous landscape plan to protect the existing indigenous vegetation and to prepare a landscape plan for implementation in the private and common areas.	Compliant	A Landscape consultant was appointed and a Landscape Plan is available.

Note: The other activities of the Operational Phase EMPr was not audited as activities were already evaluated in this audit (repetition) or activities are not yet relevant. Rehabilitation is ongoing.

Compliance Evaluation of Amended EMPr Section 10: The activity authorised is in progress and the Holder of the EA and contractors were compliant with the Amended EMPr. The EMPr is being implemented and monitored by the ECO in a professional manner and environmental management on site is of a high quality. The EA, Amended EMPr and the new site development plan is being implemented. Suitable corrective action was taken where partial compliances issues were identified in the ECO reports.

4. PHOTOGRAPHIC EVIDENCE AND OBSERVATIONS 17 MARCH 2025 AND 1 MAY 2025

Photographic Record based on 1 May 2025 site inspection by Auditor

A site visit took place on 17 March 2025 with the ECOs present to provide an orientation to the site. A follow up site inspection took place on 1 May 2025 after rain to investigate storm water management, to walk through the 6m conservation corridor, to evaluate the status of the conservation areas and to look at environmental management on site.

The investigation focussed on the following:

- EA Condition 14: Environmental file is present at the guard house.

- EA Condition 20: Specific Condition. 6-Metre-wide ecological corridor on northern boundary.
- EA Condition 21: Specific Condition. Unrestricted public access to coastal public property.
- Erosion and Stormwater Control. EMPr page 57.
- Fence line management. Trimming of vegetation to keep fence line open was not addressed in EMPr but can easily be included. New listed activities not triggered.



A site visit on 17 March 2025 with the ECOs

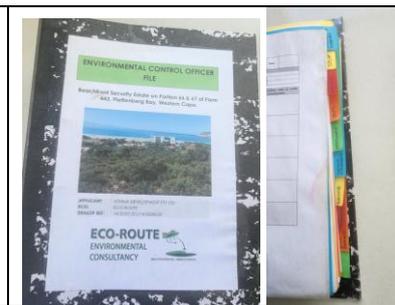


Rehabilitation in progress in 6m conservation corridor

EA Condition 14: Environmental file on site



Environmental file is present at the guard house.



Environmental file is populated.

Auditor comment: Compliant. Environmental file is populated and present at the guardhouse.

EA Condition 20: Specific Condition. 6-Metre-wide ecological corridor on northern boundary



A 6-Metre-wide ecological corridor, measured by auditor, was established and is being maintained.



Rehabilitation in the ecological corridor is satisfactory and passive restoration ongoing.



White Milkwood (*Sideroxylon inerme*) in the corridor in healthy condition.



Work has started on the footpath to the beach but currently on hold.



Wildlife tracks are present in the corridor.



Cocktail Ant nest in corridor

Auditor comment: Compliant. (Six) 6m conservation corridor being maintained and is functional for wildlife movement. The corridor is not fenced on eastern and western boundaries. No structures present in corridor.

EA Condition 21: Specific Condition. Unrestricted public access to coastal public property



The conservation corridor is unfenced at the eastern boundary (wetland side). Public access is possible.



There is a small path next to the fence starting at the eastern boundary (wetland side).

	
<p>Access is restricted in places from the eastern boundary to the gate where Athina residents will access the footpath to the beach in future. This is a good thing as wildlife is currently using the corridor without disturbance from dogs or people.</p>	<p>Gate where Athina residents will access the footpath to the beach in future.</p>
	
<p>The corridor is unfenced at the western boundary.</p>	<p>Trees were planted and passive restoration is in progress.</p>

Auditor comment: Compliant. There is public access to the beach via the conservation corridor that is restricted in places and easy walking in other places. The conservation corridor is currently functional for wildlife movement. The corridor should remain an informal (not defined) pathway for public access to the coast until development of dwellings has advanced. Wildlife is currently using the corridor without disturbance from dogs or people (potential poachers included) and it is functional. This is one of the last remaining linkages between the wetland and the coast that is still undeveloped.

Erosion and Stormwater Control EMPr page 57

	
<p>Drainage and erosion are not an issue at the moment. Civil services have been installed and the dune sand allows for easy drainage.</p>	<p>Drainage and erosion are not an issue at the moment.</p>

Auditor comment: Compliant. No stormwater or erosion after rain on 1 May 2025 site inspection noticed.

NEW: Electric fence maintenance

There is a need to prune trees and shrubs regularly to ensure that foliage does not touch the electric fence wires, not to cause sparks. A cleared boundary line is also good for fire management in case of an event.

	
Trimming of vegetation is taking place to keep fence line open.	Trimming of vegetation is taking place to keep fence line open.

Auditor comment: Trimming of vegetation to keep electric fence line open should be included as a Management outcome in the Amended EMPr. Biomass should be used to achieve conservation outcomes.

5 OVERALL COMPLIANCE

5.1 EA Conditions

The activity authorised is in progress and the Holder of the EA and contractors were compliant with the recommendations and conditions of the EA. The new site development plan is being implemented as contained in the EA Amendment.

5.2 ECO Report findings

The activity authorised is in progress and is compliant with the recommendations and conditions of the EA and Amended EMPr based on the ECO Reports. Corrective actions were implemented where partial compliance, storm water issues and a pipeline in the conservation corridor was noted. The site is currently professionally managed from an environmental management perspective.

5.3 Amended EMPr

The project is compliant with the Amended EMPr Section 10. The activity authorised is in progress and the Holder of the EA and contractors were compliant with the Amended EMPr. The EMPr is being implemented and monitored by the ECO in a professional manner and environmental management on site is of a high quality. Suitable corrective action was taken where partial compliances issues were identified in the ECO reports. Passive restoration on site is surprisingly good and the 6m ecological corridor functional for wildlife movement.

6 SUMMARY OF FINDINGS AND RECOMMENDATIONS

Summary:

- The EA, Amended EMPr and the new site development plan is being implemented.
- The site has been monitored by the ECOs (Eco Route Environmental Consultancy) as required. Most activities were compliant. The few partial compliance issues were addressed with corrective action satisfactorily.
- The Holder of the EA is a member of the SC FPA and firefighting equipment is present on site and alien vegetation clearing is ongoing.
- The 6m wide conservation corridor is functional for wildlife movement. The current status should be maintained until rehabilitation has progressed.
- No encroachment has occurred in no-go areas.

Recommendations:

- Ecological corridor reflected on approved/amended SDP but legend and colours missing (not ideal for easy reference). SDP to be updated to be suitable for distribution to landowners with a legend that clearly distinguishes development footprints (not green), conservation areas and landscaped areas.
- The ecological corridor is currently functional for wildlife movement. The corridor should remain an informal (not defined) pathway for public access to the coast until development of dwellings has advanced to discourage poaching and walking with dogs.
- Include electric fence maintenance in EMPr. Vegetation needs to be trimmed to ensure the electric fence is functional.
- Regarding EA Condition 10.1.4. "The ECO must conduct site inspections every two weeks during the rehabilitation phase and submit the ECO monitoring reports during this phase monthly". Quarterly ECO site visits and ECO Reports, until construction of the private dwellings commence, is adequate. Visiting the site every 2 weeks while no construction is taking place is not improving on site environmental management.