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Environmental Management Programme

PROPOSED REZONING AND SUBDIVISION FOR THE ESTABLISHMENT OF A RESIDENTIAL DEVELOPMENT ON ERF 3495, STRUISBAAI, CAPE AGULHAS MUNICIPALITY

20 November 2026

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REFERENCE: EMP – Erf 3495 Struisbaai

REPORT DATE: 20 November 2026

STATEMENT OF INDEPENDENCE

Neither Lornay Environmental Consulting nor any of the authors of this report have any material present or contingent interest in the outcome of this report, nor do they have any financial or other interest which may affect the independence of the author(s) or Lornay Environmental Consulting. The consultant fees paid to Lornay Environmental Consulting for the completion of this report are in line with standard professional fees and daily rates. The settling of the professional fee is not dependent on the outcome of the report.

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KEY TERMS AND ABBREVIATIONS

BAR	Basic Assessment Report
CARA	Conservation of Agricultural Resources Act (Act No. 43 of 1983)
CBA	Critical Biodiversity Area
CR	Critically Endangered
DEA&DP	Department of Environmental Affairs and Development Planning (Western Cape)
DRC	Design Review Committee
EA	Environmental Authorisation
ECA	Environment Conservation Act (Act No. 73 of 1989)
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
EN	Endangered
ESA	Ecological Support Area
FFP	Fossil Finds Procedure
HIA	Heritage Impact Assessment
HOA	Home Owners' Association
HWC	Heritage Western Cape
IZS	Cape Agulhas Integrated Zoning Scheme
NEMA	National Environmental Management Act (Act No. 107 of 1998)
NEM:BA	National Environmental Management: Biodiversity Act (Act No. 10 of 2004)
NEM:WA	National Environmental Management: Waste Act (Act No. 59 of 2008)
NGL	Natural ground level
NHRA	National Heritage Resources Act (Act No. 25 of 1999)
NMT	Non-motorised transport
PIA	Palaeontological Impact Assessment
PPE	Personal Protective Equipment
SACAP	South African Council for the Architectural Profession
SAHRA	South African Heritage Resources Agency
SCC	Species of Conservation Concern
SDP	Site Development Plan
SDS	Safety Data Sheets
SEI	Site Ecological Importance
SHE	Safety, Health and Environmental
TIA	Transport Impact Assessment
VIA	Visual Impact Assessment
VU	Vulnerable

Basic Assessment – Process followed to receive Environmental Authorisation from the Competent Authority, necessitated by NEMA.

Competent authority – The Department of Environmental Affairs and Development Planning (DEA&DP).

Construction zone – The area marked out by the ECO around each house before building work starts, a maximum of 5 m from the building on the street side and 3 m on the other sides.

Contractor – The main or specialised contractors appointed by the developer / applicant or an erf owner for the execution of the works, including all sub-contractors.

Developer / Applicant – Helemika Number 1 (Pty) Ltd.

Environmental Control Officer (ECO) – A suitably qualified, independent person appointed by the Developer / Applicant to oversee the implementation of the EMPr and EA until the completion of works on the site.

Environmental Management Programme (EMPr) – This document, approved by the competent authority, to control the implementation of the works on the site in such a way that they do not result in undue or reasonably avoidable adverse impacts on the environment.

Erf 80 – The Nature Conservation Area: Private Open Space (3.96 ha) on the northern slope of the property, retained as natural habitat.

General waste – Waste that does not pose an immediate hazard or threat to health or to the environment, and includes domestic waste, building and demolition waste, business waste and inert waste.

Hazardous waste – Any waste that contains organic or inorganic elements or compounds that may, owing to the inherent physical, chemical or toxicological characteristics of that waste, have a detrimental impact on health and the environment.

No-go area – An area demarcated for protection, which no vehicles, machinery, personnel or materials may enter without the written approval of the ECO, including Erf 80.

Project Manager – The person overall responsible and accountable for the site during the construction phase.

Site Manager – The employee of the main contractor responsible for the day-to-day control of all activities on site.

LEGISLATIVE REQUIREMENTS

A Basic Assessment process is applicable in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA) and the Environmental Impact Assessment (EIA) regulations (2014) (as amended). Appendix 4 of the NEMA EIA Regulations (GN. R982) sets out the minimum requirements for the drafting of an Environmental Management Plan (EMP). This EMP has been created in fulfilment of these prescribed requirements for the construction and post-construction phase of the activity applied for. The implementation of this EMP will be a condition of approval of the Environmental Authorisation (EA). Failure by the applicant, to comply with this EMP, will therefore constitute an offence, and the applicant and / or the appointed contractors can be held liable for penalties and / or legal action. It is therefore important that a copy of this EMP be issued to each contractor, preferably at the appointment stage, in order to allow for the costs of implementing the EMP, to be included in cost proposals. This will also ensure that the contractor is aware of his responsibilities prior to appointment and commencement. Each appointed contractor involved in the project, as well as the project manager (as applicable), will be required to sign for and thereby acknowledge contents of, the approved EMP and therefore abide by the specifications of the document and any amendments thereto.

Other applicable legislation

The Constitution of The Republic of South Africa (Act 108 of 1996)

The Constitution of the Republic of South Africa states that everyone has a right to a non-threatening environment and that reasonable measures are applied to protect the environment. This includes preventing pollution and promoting conservation and environmentally sustainable development, while promoting justifiable social and economic development.

National Environmental Management Act (Act 107 of 1998)

The National Environmental Management Act (NEMA), as amended, makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the relevant competent authorities. NEMA is a National Act, which is administered nationally by the Department of Forestry, Fisheries and the Environment (DFFE). These powers are delegated in the Western Cape to the Department of Environmental Affairs and Development Planning (DEA&DP).

National Environmental Management: Biodiversity Act (Act 10 of 2004)

Chapter 4 of the National Environmental Management: Biodiversity Act, 2004 (NEMBA) deals with threatened and protected ecosystems and species. The need to protect listed ecosystems is addressed (Section 54). Section 73 deals with Duty of Care relating to invasive species, while Section 76(2) calls for development of invasive species monitoring, control and eradication plans by all organs of state in all spheres of government, as part of environmental management plans required in terms of Section 11 of NEMA.

National Environmental Management: Waste Act (Act No. 59 of 2008)

The National Environmental Management: Waste Act (NEM:WA) provides for specific waste management measures (disposal and storage) and the remediation of contaminated land.

National Environmental Management: Air Quality Act (Act No. 39 of 2004)

Section 32 provides provision for the control of dust, section 34 provides provision for the control of noise and section 35 provides provision for the control of offensive odours, all which may be experienced during the construction or operation of an applicable development.

Environment Conservation Act (Act No. 73 of 1989)

The Environment Conservation Act (ECA) provides provision for the prevention of littering by employees and subcontractors during construction and the maintenance phases of development.

Occupational Health and Safety Act (Act No. 85 of 1993)

Section 8 outlines the general duties of employers to their employees and section 9 outlines the general duties of employers and self-employed persons, to persons other than their employees.

Hazardous Substances Act (Act No. 5 of 1973)

This Act provides for the definition, classification, use, operation, modification, disposal or dumping of hazardous substances.

National Heritage Resources Act (Act No. 25 of 1999)

This act is South Africa's primary legislation designed to establish an integrated system for the management, identification, and conservation of the nation's cultural and natural heritage.

Western Cape Land Use Planning Act (Act No. 3 of 2014) and the Cape Agulhas Municipal Land Use Planning By-law, 2022

The rezoning and subdivision of Erf 3495 require approval by the Cape Agulhas Municipality in terms of Sections 15(2)(a) and 15(2)(d) of the By-law.

National Veld and Forest Fire Act (Act No. 101 of 1998)

Places a duty on landowners to prevent and manage veld fires, prepare and maintain firebreaks, and belong to a fire protection association where one exists. It applies to the fire management plan for Erf 80.

NEM:BA Alien and Invasive Species Regulations (2020)

Require landowners to control listed invasive species, including *Acacia cyclops* and *Acacia saligna*, on their land.

1. INTRODUCTION

Helemika Number 1 (Pty) Ltd, herein referred to as the Applicant, has appointed Lornay Environmental Consulting (Pty) Ltd as the independent Environmental Assessment Practitioner (EAP) to apply for Environmental Authorisation in terms of the National Environmental Management Act (Act 107 of 1998) and the Environmental Impact Assessment Regulations (2014), as amended. This appointment relates to the application for environmental authorisation of listed activities associated with the proposed rezoning and subdivision of Erf 3495, Struisbaai, for the establishment of a private residential estate known as Bella Vista, in the Cape Agulhas Municipality.

The Environmental Management Programme (EMPr) presented in this document is a legally binding instrument applicable to the applicant, all successors in title, and any future developers or property owners, whether they assume ownership of the whole or any portion of the development. This EMPr governs the proposed residential development on Erf 3495 as outlined in this application, including any future amendments to the approved layout or site development plan. It further extends to all property owners within the development, and to the Home Owners' Association (HOA), ensuring a consistent and enforceable framework for environmental management.

This EMPr has been prepared and submitted as part of the Basic Assessment process, in accordance with the requirements of NEMA and its associated regulations. It serves as a comprehensive guideline for managing environmental impacts during the pre-construction, construction and post-construction (operational) phases of the project. The scope of the development includes the establishment of 71 single residential erven and dwellings, private internal streets, private open spaces, a 3.96 ha Nature Conservation Area (Erf 80), and the associated civil and electrical services infrastructure. The document is prescriptive in nature, detailing mitigation measures and assigning specific responsibilities to the individuals or organisations tasked with implementing them.

The site supports Agulhas Limestone Fynbos, which is listed as Critically Endangered, and almost the entire property is mapped as a Critical Biodiversity Area 1 (CBA1). The specialist studies confirmed populations of plant and animal Species of Conservation Concern (SCC), including the Endangered *Mimetes saxatilis*. The mitigation measures recommended by the specialists are therefore reproduced in this EMPr as written in their reports, so that their intent and accuracy are retained. Where the EAP has added measures, these are identified as such.

The primary objective of this EMPr is to minimise or, where possible, entirely avoid potential environmental impacts arising from the proposed development. It addresses key activities such as vegetation clearing, earthworks, civil works, residential construction, rehabilitation and the long-term management of the retained natural habitat, while promoting sustainable development practices. As a dynamic document, the EMPr is designed to be adaptable, allowing for periodic updates to reflect changing site conditions or project requirements. While it is compiled as an integral component of the Basic Assessment process, this EMPr becomes legally enforceable upon approval by the Competent Authority, the Department of Environmental Affairs and Development Planning (DEA&DP).

Upon completion of the construction phase, a completion audit is anticipated to be required, as may be stipulated in the Environmental Authorisation (EA). This EMPr has been drafted in accordance with Section 24N of the National Environmental Management Act (NEMA, Act 107 of 1998) and Appendix 4 of the EIA Regulations, 2014 (as amended).

2. DEVELOPMENT PROPOSAL

2.1. Property description

Erf 3495, Struisbaai is 12.2244 ha in extent (deed area 122 244 m²) and is registered to Helemika Number 1 (Pty) Ltd under Deed of Transfer T66544/2005. It is centred on approximately S 34°48'31.9" E 20°02'00.7" on the south-western fringe of Struisbaai, within the urban edge of the Cape Agulhas Municipality. The property is bounded by Adelle Street to the east, the municipal water reservoirs (Erf 4103) and Noreen Street to the south, and the Remainder of Farm Paapekuilsfontein No. 281 (RE/281) to the west and north. It is zoned Agricultural Zone 1 in terms of the Cape Agulhas Integrated Zoning Scheme (2022), is undeveloped and not farmed, and contains no structures.

The land rises from approximately 30 m to 35 m above mean sea level at the northern apex to approximately 59 m to 65 m above mean sea level near the reservoirs. The southern and central part of the property, where development is proposed, is a gently sloping crest (average gradient approximately 5%), while the northern part falls steeply (average gradient approximately 11%) and is excluded from development. The surface geology is calcareous sand of the Strandveld Formation over calcrete of the Waenhuiskrans Formation, which crops out as limestone pavement. Two 10 m municipal water pipeline servitudes (LG Diagram 5879/1972) cross the property.

2.2. Applications required

The following applications are required:

- **Rezoning** of Erf 3495 from Agricultural Zone 1 to Subdivisional Area in terms of Section 15(2)(a) of the Cape Agulhas Municipal Land Use Planning By-law, 2022.
- **Subdivision** of the Subdivisional Area into 72 Single Residential Zone erven, private street erven, private open space erven and a Nature Conservation Area (private open space) erf, in terms of Section 15(2)(d) of the Cape Agulhas Municipal Land Use Planning By-law, 2022.

Table 1. Listed activities applied for

Listing Notice and activity	Description	Relevance to the development
Listing Notice 1, Activity 27	The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation.	The development footprint is approximately 8.15 ha, excluding the Nature Conservation Area.
Listing Notice 1, Activity 28	Residential developments on land used for agriculture on or after 1 April 1998, inside an urban area where the land to be developed is bigger than 5 ha, or outside an urban area where it is bigger than 1 ha.	The property is zoned Agricultural Zone 1 and the development footprint is approximately 8.15 ha. DEA&DP determined that the site is outside the built-up urban area, and sub-paragraph (ii) is applied on that basis.
Listing Notice 3, Activity 12 (i)(i) and (ii)	The clearance of 300 m² or more of indigenous vegetation in the Western Cape within a Critically Endangered ecosystem or within a Critical Biodiversity Area.	Approximately 8.15 ha of Critically Endangered Agulhas Limestone Fynbos within a CBA1 will be cleared for the residential erven, private streets and private open space.

2.3. Development components and measurements

The preferred alternative is the Alternative 2 Preferred Layout. It clusters the development on the southern and central part of the property and retains the steep northern slope as a single block of natural habitat contiguous with RE/281. The development will operate as a private, access-controlled estate, and all internal streets, open spaces and services are private and will be owned and maintained by the HOA.

Table 2. Land use components of the preferred layout (Alternative 2)

Erven	Zoning and use	Area (m²)	% of layout	Number
1 – 71 and 79	Single Residential Zone (single dwellings)	63869.3	52.6	72 erven
72	Street: Private	11666.5	9.6	1 erf
73 – 78	Open Space: Private (pipeline servitude corridors, pocket park at Erf 75 and remnant at Erf 78)	6 160.4	5.1	6 erven
80	Nature Conservation Area: Private Open Space	39 600.3	32.7	1 erf (3.96 ha)
Total	Layout schedule (the deed area is 122 244 m²; the schedule is 1 114 m² short)	**121 130**	**100**	80 erven

The development footprint, being the area of natural habitat that will be lost or transformed, is approximately 8.15 ha (67% of the property), comprising the residential erven, private streets and private open space. The retained natural habitat is Erf 80 (3.96 ha, 32.7%).

2.3.1. Residential erven

- 72 single residential erven ranging from 617.3 m² (Erf 40) to 1 663.3 m² (Erf 21), with an average of approximately 881 m².
- Footprint bands (Architectural Guidelines Rev 03): Band A, up to 749 m² (23 erven), maximum footprint 300 m²; Band B, 750 to 999 m² (34 erven), maximum footprint 350 m²; Band C, 1 000 m² and larger (14 erven), maximum footprint 400 m². Maximum coverage is 50%, and the smaller of the footprint and coverage limits applies.
- Height zones: Double storey north (Erven 1, 26 to 38, 41 and 64 to 67; 19 erven) and double storey south (Erven 10 to 16; Erf 79), maximum 7.5 m above natural ground level (NGL) and 6.0 m to wall plate, with the upper floor limited to 50% of the ground floor footprint; single storey central (Erven 2 to 9, 17 to 25, 39, 40, 42 to 63 and 68 to 71; 45 erven), maximum 6.0 m above NGL and 3.3 m to wall plate.
- Building lines: 4.0 m street, 2.0 m side, 2.0 m rear, and 3.0 m to Erf 80 or private open space (proposed). Ground floor platforms may not be raised more than 1.0 m above NGL.

2.3.2. Private streets and access

- Internal double loop road within 13 m road reserves (Erf 72), with road widths of a maximum of 6 m.
- Preliminary pavement design: 70 mm block paving on 20 mm bedding sand, 150 mm G5 subbase and 150 mm G7 in-situ subgrade, with a cross-fall section and mountable kerbing on the lower side to channel stormwater (Icon Consulting Engineers, Rev 2).
- One access: a priority stop-controlled access is provided off Adelle Street, approximately 90 m south of the Lynn Street intersection, with single ingress and egress lanes. At the Adelle Street access, approximately 30 m of stacking is available against the 21 m required, and the shoulder sight distance exceeds the required 120 m in both directions (Innovative Transport Solutions, ITS 4797.1, October 2026).
- Parking: two parking bays per house plus one visitor bay on the erf; one driveway per erf, maximum 3.5 m wide where it crosses the verge.

2.3.3. Private open space and Nature Conservation Area

- Private open space Erven 73 to 78 (6 160.4 m²): the corridors of the two 10 m municipal water pipeline servitudes, which cross the site diagonally over Erven 73 to 77 plus Erf 80, a pocket park with pergola at Erf 75 and a small remnant at Erf 78 on the southern boundary. No private structure, wall, pool, tank or deep-rooted planting may encroach onto the servitudes.
- Erf 80 Nature Conservation Area: Private Open Space (39 600.3 m²), comprising the steep northern slope of the site, retained with its existing vegetation as a single block contiguous with RE/281.

2.3.4. Civil and electrical services

The Cape Agulhas Municipality confirmed in a letter dated 3 October 2025 that municipal water sources and storage, sewerage purification and electricity are available. The services, as described in the Civil Engineering Report (Icon Consulting Engineers, Roads and Services, Revision 2, October 2026), are summarised in Table 3.

Table 3. Civil and electrical services

Service	Description and design parameters
Water	Connection to the existing 160 mmØ municipal watermain along the western road reserve of Adelle Street, with a bulk water meter for the Municipality. Internal reticulation of 110 mmØ uPVC Class 16 pipes behind the road kerb, in trenches up to 1 m deep and 700 mm wide. Annual Average Daily Demand 0.7396 ℓ/s (71 units at 900 ℓ/unit), peak flow 2.9584 ℓ/s; fire flow 15 ℓ/s at 15 m residual head for 2 hours, hydrants at 120 m spacing; main supply sized for 17.9584 ℓ/s. Residual pressure: minimum 25 m under peak demand, maximum 90 m under zero flow. No connections will be permitted to the reservoir supply watermains in the two servitudes, which must not be affected or damaged during construction. Water saving and rainwater harvesting measures must be investigated and implemented.
Sewer	Waterborne gravity sewer of 110 mmØ and 160 mmØ Class 34 heavy-duty uPVC pipes under the road surface, in trenches up to 2.5 m deep and 800 mm wide; erf connections 1.2 m deep. Daily dry weather flow 0.5177 ℓ/s (630 ℓ/unit) and instantaneous peak wet weather flow 1.5531 ℓ/s. Connection to the existing 160 mmØ municipal gravity sewer at the corner of Adelle Street and Santie Street (Ocean View Heights), draining to the Ocean View Heights pump stations. No pumping system is required.
Stormwater	Piped minor system for the 2-year storm event (300, 375 and 450 mmØ Class 100D pipes), with the 100-year event accommodated in the road reserves and open spaces. Attenuation volume based on the post-development flow less the pre-development flow. Discharge through a stormwater dissipation, silt and debris trap to the municipal system at Adelle Street and Karen Close, where the Ocean View Heights attenuation ponds were designed to accept flow from the site.
Solid waste	Refuse will be collected, managed and disposed of by the Cape Agulhas Municipality.
Electrical	Bulk supply by the Cape Agulhas Municipality to one point on the estate boundary; the developer installs the internal network and the HOA maintains it. Each erf will have a municipal prepaid meter (Converge Consulting; Architectural Guidelines Rev 03).
Telecommunications	A Telkom and fibre duct network installed by the developer.

2.3.5. Architectural and landscape controls

All dwellings must comply with the Erf 3495 Struisbaai Architectural Guidelines and the Master Landscape Plan, as refined in accordance with the specialist recommendations in this EMPr. The guidelines are summarised in Section 10 and are to be attached to the HOA constitution and title conditions.

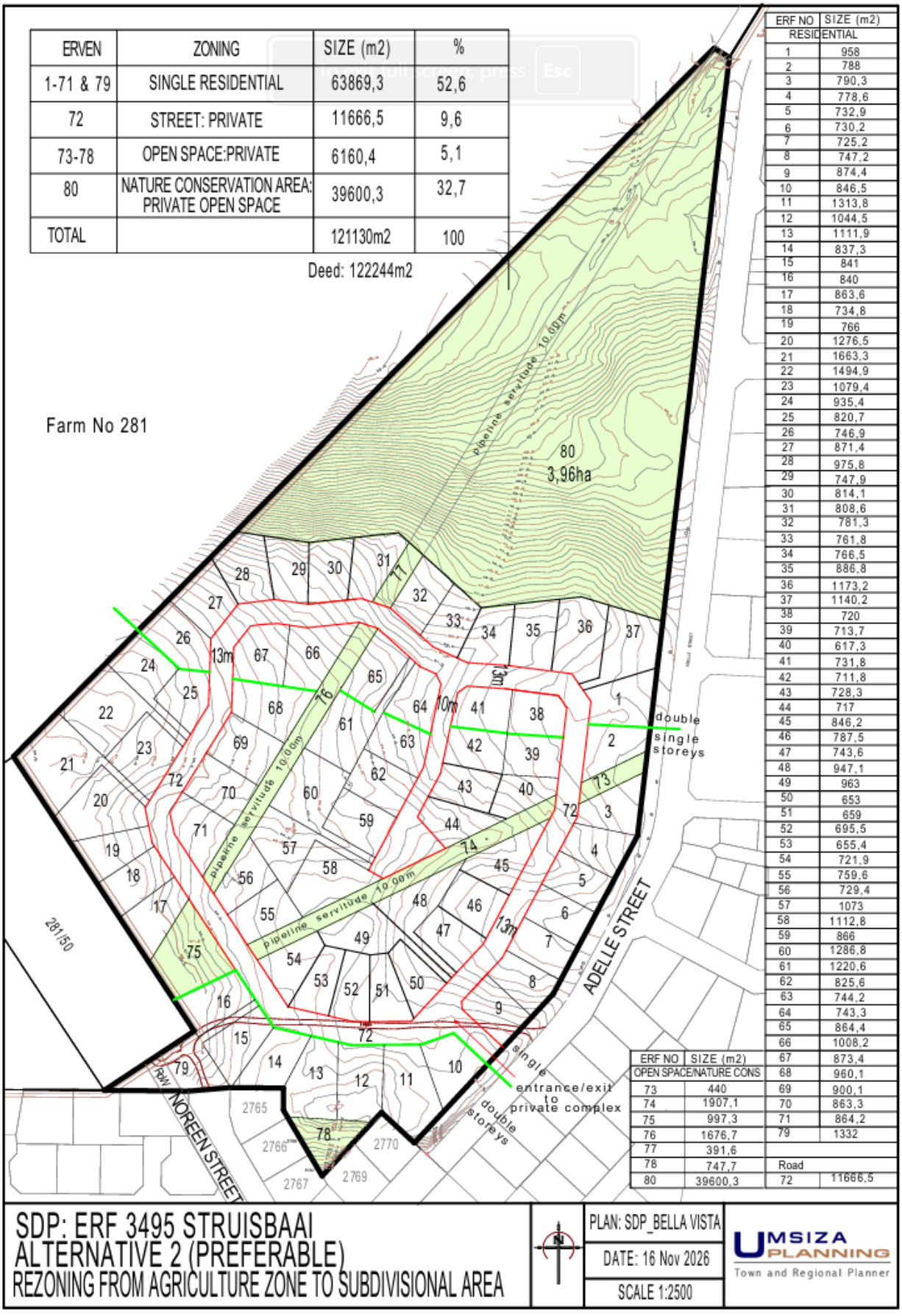


Figure 1. Alternative 2 Preferred Layout.

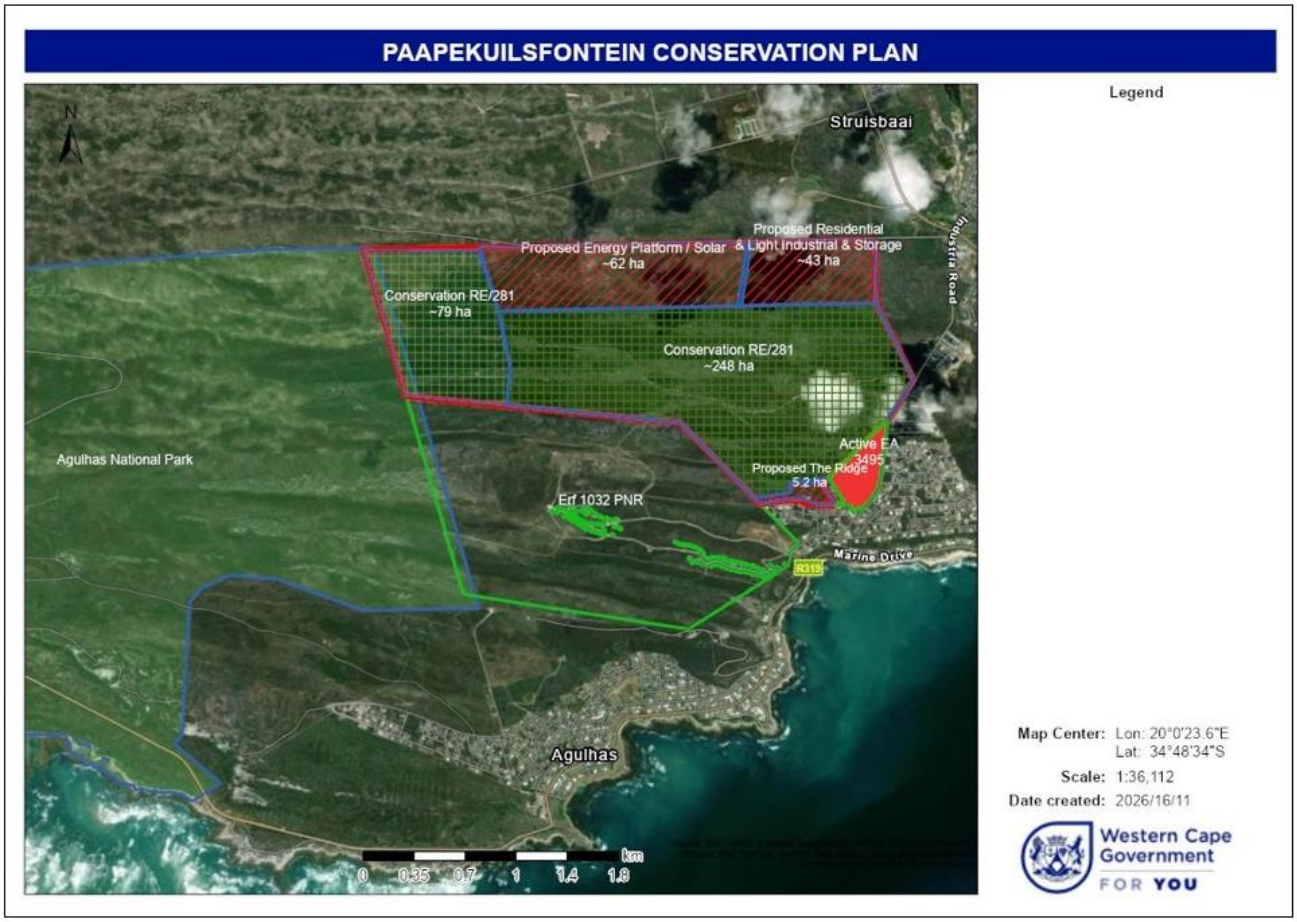


Figure 2. Paapekuilsfontein Conservation Master Plan (draft concept option, to be further refined with input from SANParks and Cape Nature).

3. TERMS OF REFERENCE

The primary objective of this EMPr is to identify, manage and mitigate any potential negative environmental impacts that may arise during the pre-construction, construction and post-construction phases of the proposed residential development and associated infrastructure. The EMPr serves as a guiding document to ensure that the development is carried out in an environmentally responsible manner, in compliance with relevant legislation and best practice.

3.1. Scope of application

- This EMPr applies to all pre-construction, construction and post-construction / operational activities associated with the proposed development, including site preparation, vegetation clearing, earthworks, civil services, internal roads, building construction and the long-term management of Erf 80 and the private open spaces.
- It must be made available to all contractors, subcontractors, owners, builders and relevant stakeholders involved in the project, ensuring that it forms an integral part of all tender documentation, building contracts and the HOA constitution.

3.2. Binding requirements

- The provisions of this EMPr are binding on the applicant/owner, the HOA, individual erf owners, all contractors, subcontractors, and any third parties acting on their behalf.
- The applicant/owner is responsible for ensuring that all contractors and subcontractors are fully informed of the environmental requirements contained within this document.
- Failure to comply with the EMPr's requirements by any party involved in the construction will result in appropriate penalties, and the contractor will be obligated to remedy any environmental damage caused by their actions or the actions of their subcontractors.

3.3. Responsibilities and accountability

- The contractor is accountable for the environmental performance of the site and must ensure that all activities are conducted in accordance with the environmental standards and guidelines set out in the EMPr.
- The contractor must also take proactive steps to prevent environmental damage and address any environmental issues that may arise during construction.
- In the event of environmental harm or non-compliance, the contractor will be required to restore the affected areas and bear any costs associated with remediation or penalties imposed.

3.4. Implementation and compliance monitoring

- Regular site inspections and audits will be conducted to monitor compliance with the EMPr. Any non-compliance will be recorded, and corrective actions will be mandated to mitigate environmental risks.
- Contractors and subcontractors are required to cooperate fully during audits and inspections, and all personnel must receive appropriate environmental training to ensure adherence to the EMPr's guidelines.

4. ENVIRONMENTAL CONTROL ON SITE

4.1. Approach

The table below illustrates the various approaches to be undertaken to manage potential scenarios as a result of the activity on site:

Table 4. Impact management

Avoidance	Avoiding activities that could result in adverse impacts and/or resources or areas considered sensitive.
Prevention	Preventing the occurrence of negative environmental impacts and/or preventing such an occurrence having negative impacts.
Preservation	Preventing any future actions that might adversely affect an environmental resource.
Minimisation	Limiting or reducing the degree, extent, magnitude or duration of adverse impacts through scaling down, relocating, redesigning and/or realigning elements of the project.
Mitigation	Measures taken to minimise adverse impacts on the environment.
Enhancement	Magnifying and/or improving the positive effects or benefits of a project.
Rehabilitation	Repairing affected resources, such as natural habitats or water resources.
Restoration	Restoring affected resources to an earlier (possibly more stable and productive) state, typically 'background' or 'pristine' condition. These resources may include soils and biodiversity.
Compensation	Compensating for lost resources, and where possible, the creation, enhancement or protection of the same type of resource at another suitable and acceptable location.

4.2. Organisational structure and responsibilities

The Applicant and their appointed contractors will be responsible for the construction of the civil services, internal roads and associated infrastructure, and individual owners and their builders for the construction of each house. All construction-related staff are to be briefed on the requirements of the EA and EMPr, and copies of these documents are to be kept on site during all phases of construction. Long-term management will be required in the post-construction / operational phase, and this will be undertaken by the HOA, or another designated land-management entity, in coordination with the conservation management of the broader Paapekuilsfontein property.

4.3. Environmental Control Officer

Due to the sensitivity of the site, an independent, suitably qualified ECO must be appointed before any site works start, for the duration of the construction phase, including the construction of individual houses. ECO site visits must take place as per the conditions of the Environmental Authorisation. The applicant (owner/holder) will be responsible for the remuneration of the ECO and any other expenses encountered in the process of environmental monitoring of the construction.

Roles and responsibilities of the ECO

- Ensure compliance with the EMPr and the relevant conditions of the EA at all times during the pre-construction and construction phases.
- Meet with the contractors to set out the environmental parameters within which they must work, and conduct the environmental induction of all contractors and staff.
- Indicate where all no-go areas are to be demarcated, including the surveyed boundary of Erf 80, the pipeline servitudes and the construction zone of each erf, and ensure adherence to these delimitations BEFORE any construction or site clearance commences.

- Undertake, or oversee, the pre-construction faunal inspection immediately before vegetation clearing commences within each portion of the development footprint, following appropriate briefing by the faunal specialist.
- Oversee the search and rescue of geophytes, succulents and other transplantable species and the collection of seed of *Mimetes saxatilis* and other Proteaceae before clearing.
- Inspect the construction footprint and the Erf 80 interface on a weekly basis during construction, and take immediate measures to address any unforeseen disturbance of Erf 80.
- Implement the Fossil Finds Procedure, liaise with Heritage Western Cape and the standby palaeontologist, and keep a register of finds.
- Mark out the construction zone around each house (maximum 5 m from the building on the street side and 3 m on the other sides) before building work starts.
- Review method statements and determine the most environmentally sensitive options.
- Ensure that the correct earthworks practices are adhered to, for example no encroachment into the surrounding vegetation, separation of topsoil and subsoil, and correct stripping and stockpiling of topsoil.
- Advise on rehabilitation and landscaping measures, using locally indigenous species.
- Attend site meetings as required, receive notices and minutes of all site meetings, and maintain an open and direct channel of communication with the construction team and site manager.
- Take immediate action on site where no-go areas are violated, or in danger of being violated, and inform the site manager immediately of the transgression and the action taken.
- Maintain records of significant fauna encountered during construction, rescue or relocation events, faunal mortality, fossil finds and unauthorised disturbance of Erf 80.
- Keep an up-to-date record of works on site, as they relate to environmental issues, in the site diary, and be contactable by the public regarding matters of environmental concern during the construction phase.
- Submit monthly compliance reports to the applicant and a completion report to the competent authority (DEA&DP) upon completion of the construction phase and before the EA lapses.

4.4. Project Manager

In addition to the ECO, the Project Manager will be responsible for the following:

- All activities relating to the construction phase.
- Delegating activities in accordance with the EMPr.
- Communicating design changes and technical issues to the team timeously.
- Ensuring that all contractors are managing their teams adequately and abiding by the conditions of the EMPr and EA.
- Ensuring that the contractors are aware of the conditions of the EMPr and EA.

4.5. Contractor

The Contractor (including sub-contractors and the builders of individual houses) will be responsible for:

- Familiarising themselves with the BAR, the EA and this EMPr, and signing the estate's Rules for Contractors.
- Complying with the EMPr and EA commitments and any other legislative requirements as applicable.
- Adhering to any instructions issued by the Project Manager, the ECO or the Safety, Health and Environmental (SHE) Officer.
- Submitting an environmental report at designated site meetings on the environmental incidents that have occurred, if applicable.
- Arranging that all employees and those of the subcontractors receive appropriate environmental induction prior to the commencement of construction.

4.6. Specialists and the professional team

The following persons must be available to the ECO and the Applicant during the implementation of this EMPr:

Table 5. Specialists and the professional team

Role	Person / company
Botanical specialist	Dr D.J. McDonald, Bergwind Botanical Surveys & Tours CC
Faunal specialist	Prof J.A. Venter and Dr R. Swart, Wildlife Conservation Decision Support
Standby palaeontologist	Dr J. Pether (or another qualified palaeontologist)
Visual specialist	Ankia Bormans, Terra+ Landscape Architects
Landscape architect	JDV Landscape Studio (registered landscape architect)
Civil engineer	Icon Consulting Engineers
Traffic engineer	Innovative Transport Solutions (Pty) Ltd
Snake handler	To be appointed (competent snake handler)

4.7. Site documentation and reporting

Site logbook

A logbook must be kept on the construction site for the purposes of recording on-site instructions and as a general record of environmental issues. The logbook must be kept for a minimum of two years after the activity is completed for the relevant authority to review if deemed necessary. A photographic record of the site before, during and after construction must also be kept, including fixed-point photographs of the Erf 80 interface. The logbook must contain an Environmental Site Instruction section, a Site Diary (including the complaints register, the environmental incident register, disposal certificates for waste and sewage, and non-conformance records), a Monitoring section, a Fauna Register and a Fossil Finds Register.

The Environmental Authorisation (EA), a copy of the approved EMPr, the HWC comment, the Fossil Finds Procedure and the Architectural Guidelines must be accessible on site at all times.

4.8. Home Owners' Association

A Home Owners' Association (HOA), or another designated land-management entity, must be established to implement and manage the long-term management actions required on site. The HOA constitution and title conditions must include, as a minimum:

- The obligation to manage Erf 80 as a Nature Conservation Area in accordance with this EMPr, coordinated with conservation management on the broader Paapekuilsfontein property.
- The Architectural Guidelines, the Design Review Committee and the plan approval process.
- The approved plant palette, a list of prohibited invasive garden plants, and the prohibition of dumping of garden refuse in Erf 80.
- Rules on domestic animals, lighting, burning, access to Erf 80 and the removal of natural material from Erf 80.
- A mechanism for dealing with repeated non-compliance, and responsibility for the long-term monitoring programme in Section 11.3.

5. CONDITIONS OF AUTHORISATION AND PRE-COMMENCEMENT REQUIREMENTS

The Environmental Authorisation (EA), once issued, will be included here and will be mandatory for all contractors, sub-contractors, agents, consultants and construction personnel working on the property. Any conditions issued by Heritage Western Cape in its final comment on the Heritage Impact Assessment (HWC Case No. HWC23083108MS0904) must also be included.

The following must be completed before any vegetation clearing or construction commences:

Table 6. Pre-commencement requirements

Requirement	Source	Responsibility
Spring census of *Mimetes saxatilis* (and other proteoid SCC) on the development footprint and in Erf 80, and adjustment of the Erf 80 boundary to retain the densest stands where feasible.	Botanical specialist (Section 11.6, measure 1)	Applicant / botanical specialist
Survey for the Scarce Mountain Copper butterfly between January and March to confirm presence or absence.	Faunal specialist	Applicant / faunal specialist
Visual simulations from Viewpoints 1 to 12, verification of the double storey zones, and refinement of the Architectural Guidelines and Landscape Master Plan for submission to the visual specialist and HWC for ratification.	VIA; HIA recommendations to HWC	Applicant / architect / landscape architect / visual specialist
Zoning of Erf 80 for nature conservation and registration of a title deed restriction or equivalent legal instrument.	Botanical specialist	Applicant
Securing of the Struisbaai Conservation Master Plan conservation areas, subject to the botanical specialist's conditions (Section 7.1), before or at the same time as the loss of habitat on Erf 3495, or a separate biodiversity offset.	Botanical specialist; faunal specialist	Applicant / competent authority
Fire management plan, prepared with the local fire protection association and Cape Nature.	Botanical specialist	Applicant
Detailed Landscape Plan by a registered landscape architect, with a revised plant palette.	VIA; botanical specialist	Applicant / landscape architect
Final fencing design, with the security perimeter enclosing the residential component and permeable fencing on Erf 80 to allow the connection with the adjoining natural habitat.	Faunal specialist	Applicant
Appointment of the ECO, the standby palaeontologist, a snake handler and the Estate Architect.	EMPr	Applicant

6. ENVIRONMENTAL AWARENESS

It is important to ensure that the contractors and employees associated with the proposed activity receive the appropriate level of training and awareness, so that continual environmental due diligence and conservation are applied at all levels of work carried out on site. Employees, contractors and sub-contractors must be made aware of their responsibilities in terms of relevant legislation and guidelines, as well as this EMPr and the EA. The environmental conditions must be included in the contracts issued to the contractors.

6.1. Aim of the environmental awareness plan

- Promote environmental education and conservation on site.
- Inform employees and contractors of the applicable environmental procedures and plans.

6.2. Environmental awareness training and content

- All personnel must undergo induction, which as a minimum must include safety, health and environmental awareness.
- All attendees must sign an acknowledgement register upon receiving and understanding the induction.
- Construction and operational staff must be trained on the implementation of emergency procedures where applicable.
- Proof of training must be kept on record.

In addition to good housekeeping, dust, waste, sanitation and the handling of chemicals, the induction must cover the matters identified by the faunal specialist (quoted as written):

- All construction personnel must receive environmental induction before commencing work.
- Induction should cover the ecological sensitivity of Agulhas Limestone Fynbos, the status of Erf 80 as a conservation/no-go area, the potential occurrence of threatened fauna, procedures for animals encountered during construction, prohibition on killing snakes and other fauna and restrictions on access to retained natural habitat.

The induction must also cover the Fossil Finds Procedure (Section 7.3), the protection of the municipal watermains in the pipeline servitudes, and the procedure for safe snake removal, with the contact details of the competent snake handler.

7. CONSTRUCTION PHASE IMPACTS AND MITIGATIONS

This section sets out the construction-phase impacts identified by the specialists and the mitigation measures they recommend. **The specialist measures are reproduced as written in the specialist reports and must be implemented as such.**

7.1. Botanical and terrestrial biodiversity

Source: Botanical and Terrestrial Biodiversity Impact Assessment (Dr D.J. McDonald, Bergwind Botanical Surveys & Tours, October 2026)

Impact 1: Loss of Agulhas Limestone Fynbos [CR] and CBA1 habitat. Development of the residential erven, streets and services would result in the total and permanent loss of the Agulhas Limestone Fynbos on the development footprint (8.15 ha for Alternative 2). The impact is rated High Negative before mitigation and Medium Negative after mitigation for Alternative 2.

Impact 2: Loss of plant species of conservation concern. Plants of *Mimetes saxatilis* (EN), *Leucospermum patersonii* (VU) and other limestone endemics on the development footprint would be lost. *M. saxatilis* cannot be transplanted, so search and rescue is not a mitigation measure for this species. The impact is rated High Negative before mitigation and is reduced to Medium Negative for Alternative 2, provided that a pre-construction census of *M. saxatilis* is undertaken and the layout is refined to retain the densest stands where feasible.

7.1.1. Mitigation measures (Section 11.6 of the botanical report)

The following mitigation measures apply to Alternative 2. They must be included in the Environmental Management Programme (EMPr).

- A census of *Mimetes saxatilis* (and other proteoid SCC) on the development footprint and in Erf 80 must be undertaken in spring before the layout is finalised, and the boundary of Erf 80 and the adjacent erven should be adjusted to retain the densest stands where feasible.
- Erf 80 must be zoned for nature conservation, fenced on its developed edge with fauna-permeable fencing, and protected by a title deed restriction or equivalent legal instrument. It should be incorporated into the management of the RE/281 conservation area.

- The construction footprint must be demarcated before any clearing. No vehicles, stockpiles, spoil or construction camps may be placed in Erf 80.
- A search and rescue of geophytes, succulents and other transplantable species must be undertaken by a suitably qualified person before clearing, with the plants used for landscaping or relocated to Erf 80 or RE/281. Seed of *M. saxatilis* and other Proteaceae should be collected for propagation by a specialist nursery.
- Topsoil from the footprint should be stripped and re-used on road verges and private open space to retain the soil seed bank.
- A vigorous alien invasive clearing programme must be implemented on the whole erf before construction and maintained in Erf 80 during the operational phase. Cut alien material must be removed from the site and not left in situ.
- Landscaping of streets, private open space and gardens must use locally indigenous species. A list of prohibited invasive garden plants must be included in the home owners' constitution.
- A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge rather than in Erf 80, so that ecological burning of Erf 80 together with the adjoining RE/281 remains possible.
- Measures to limit the spread of the Argentine ant (inspection of imported soil, plants and building material) and controls on pets and access must be included in the operational EMPr.

In addition, the botanical specialist recommends that the precautionary principle should be invoked in finalising the boundary of the Nature Conservation Area, since the size of the *M. saxatilis* population on the erf is not known, and that a vigorous alien invasive clearing programme must be implemented, and cut alien material must be removed from the site, whether or not the development proceeds.

7.2. Terrestrial animal species

Source: Terrestrial Animal Site Sensitivity Verification and Species Specialist Assessment Report (Venter & Swart, November 2026, Version 3)

The overall Site Ecological Importance of the faunal habitats and ecological processes is High. The principal construction-phase impacts are the permanent loss and transformation of faunal habitat, and construction-related disturbance, displacement and direct mortality. Under Alternative 2 these impacts are assessed as Medium–High Negative before mitigation and Medium Negative after mitigation. Fauna recorded on the site include Cape Grysbok, Cape Golden Mole, Angulate Tortoise, two gecko species, approximately 20 bird species and the Rûens velvet worm, and the likelihood of occurrence of the Southern Adder is high.

The faunal specialist states that the measures below should be incorporated into the EMPr, relevant construction specifications and, where applicable, the estate management rules, architectural guidelines and Homeowners' Association requirements. The construction-phase measures are reproduced as written:

7.2.1. Protection and management of Erf 80

- Erf 80 must be retained and managed primarily for conservation of natural Agulhas Limestone Fynbos and associated faunal habitat.
- The boundary between Erf 80 and the residential development must be surveyed and clearly demarcated before site establishment and vegetation clearing commence.
- Erf 80 must be treated as a construction no-go area, apart from approved conservation management activities such as invasive alien plant clearing, rehabilitation, ecological monitoring, fire management and authorised access.
- No construction camps, contractor lay-down areas, spoil areas, material stockpiles, concrete mixing, temporary vehicle parking, waste-storage areas or construction access routes may be established within Erf 80.

- Permanent services and infrastructure should remain within the approved development footprint. Infrastructure requiring subsequent disturbance within Erf 80 should be avoided where a technically feasible alternative exists.
- Private gardens, structures, storage areas, informal tracks or recreational facilities may not progressively encroach into Erf 80.
- The area should retain the character and ecological function of natural Agulhas Limestone Fynbos and should not progressively be converted into a landscaped recreational park.

7.2.2. Pre-construction faunal inspection

- A pre-construction faunal inspection should be undertaken immediately before vegetation clearing commences within each portion of the development footprint.
- The inspection should be undertaken by a suitably experienced faunal specialist or by the Environmental Control Officer (ECO) following appropriate briefing by the faunal specialist.
- Searches should concentrate on habitat features likely to shelter terrestrial fauna, including rock slabs, loose rocks, dense shrubs, woody debris, sandy soil and other natural refugia.
- Particular attention should be given to reptiles, tortoises and other slow-moving or cryptic fauna. Southern Adder (Bitis armata) has a high likelihood of occurrence within suitable habitat on Erf 3495, while Angulate Tortoise (Chersina angulata) was recorded during the field assessment.
- Animals encountered within areas scheduled for immediate clearing should be allowed to move away from the disturbance where possible. Slow-moving fauna that cannot safely leave the construction area may be moved a short distance into suitable adjoining natural habitat, subject to applicable legal requirements.
- If a Southern Adder or another reptile is encountered, work in the immediate area must stop until the animal has moved away or has been safely removed by a competent person. Snakes may not be killed.
- If an unconfirmed Species of Conservation Concern is encountered within the construction footprint, work in the immediate area should stop and the faunal specialist should be contacted to determine whether additional mitigation or permitting is required.
- Search-and-rescue must remain a precautionary construction measure and may not be used to justify avoidable clearing of sensitive habitat.

7.2.3. Vegetation clearing and construction footprint

- Vegetation clearing must remain strictly within the authorised Alternative 2 development footprint.
- Clearing should proceed progressively and should not extend substantially ahead of construction.
- Where practicable, vegetation clearing should progress in a manner that allows mobile fauna to move towards retained natural habitat.
- Natural vegetation, rock slabs, refugia and soil surfaces outside the approved footprint may not be disturbed for construction convenience.
- Machinery operators must be instructed to stop work when tortoises, snakes or other fauna are observed in the immediate working area.
- No indigenous fauna may be deliberately killed, collected or removed from the property by contractors or construction personnel.
- Temporary construction disturbance should be minimised and affected areas rehabilitated as soon as they are no longer required.

7.2.4. Southern Adder and other reptiles

- Southern Adder is a threatened and range-restricted reptile associated with coastal lowland fynbos and suitable sandy and rocky microhabitats. Suitable habitat occurs within Erf 3495 and the likelihood of occurrence was assessed as high.
- Rock slabs, loose rocks, dense shrub refugia and other suitable microhabitats within areas scheduled for clearing should be inspected immediately before disturbance.

- Natural rocky refugia within Erf 80 must remain undisturbed except where disturbance is specifically required for approved conservation management.
- Rocks may not be removed from Erf 80 for landscaping, retaining walls or private gardens.
- Construction personnel must be informed that snakes/reptiles may not be killed. The EMPr should include a procedure for safe snake removal and contact details for a competent snake handler.
- Tortoises and other slow-moving reptiles encountered within active construction areas should be moved out of immediate danger into suitable adjoining habitat.

7.2.5. Threatened and ground-nesting birds

- Several bird SCC assessed for Erf 3495 are associated with lowland fynbos, open natural vegetation or ground-nesting habitats, including Black Harrier, Denham's Bustard, Southern Black Korhaan and Fynbos Buttonquail.
- Natural vegetation scheduled for clearing should be checked immediately beforehand for active nests or obvious breeding activity.
- If an active indigenous bird nest is located within or immediately adjacent to the clearing area, disturbance around the nest should stop and an appropriate exclusion area should be maintained until breeding has been completed.
- The size of the exclusion area should be determined according to the species, nest location and nature of the surrounding disturbance.
- Active nests may not be deliberately destroyed.
- Construction personnel may not deliberately disturb, capture or interfere with birds using the development footprint or retained natural areas.
- Avoid the active breeding season when scheduling vegetation clearing.

7.2.6. Scarce Mountain Copper and other invertebrate habitat

- The Scarce Mountain Copper is a highly range-restricted threatened butterfly dependent on suitable vegetation and associated ecological interactions. Avoidance of unnecessary habitat clearing therefore remains the primary mitigation measure for this receptor.
- Known or subsequently identified important host-plant or associated microhabitat patches within retained natural habitat must be protected.
- Alien clearing and restoration within Erf 80 should retain indigenous vegetation structure and minimise unnecessary disturbance of soil and intact microhabitats.
- Routine broad-spectrum insecticide application may not take place within Erf 80.
- Fire management should retain the natural vegetation dynamics and post-fire habitat mosaics required by fynbos-associated invertebrates.

7.2.7. Cape Golden Mole and soil disturbance

- Cape Golden Mole (*Chrysochloris asiatica*) was recorded during the field assessment. Its relevance to mitigation arises primarily from excavation, soil disturbance and compaction within the development footprint.
- Unnecessary grading, excavation, soil compaction and vehicle movement outside the authorised development footprint must be prohibited.
- Where active subterranean fauna are encountered during excavation, work in the immediate area should pause sufficiently to allow the animal to move away or for appropriate specialist advice to be obtained.
- Soil disturbance within Erf 80 should be restricted to activities required for approved ecological restoration and management.

7.2.8. Trenches, excavations and entrapment risks

- Open trenches, service excavations and other steep-sided excavations can trap reptiles, small mammals and other terrestrial fauna.
- Excavations should be closed or backfilled as soon as practicable.
- Where excavations remain open overnight, suitable escape opportunities should be provided using sloped soil ramps, boards or another effective means of egress.
- Open excavations should be inspected before work begins each morning and before backfilling.
- Animals found trapped in excavations must be safely removed before construction continues.
- Pipes and other hollow construction materials stored on site should be capped or inspected before use.

7.2.9. Waste and pollution

- No spoil, rubble, household waste, garden waste or construction material may be deposited within Erf 80.
- Construction waste must be collected and removed to an authorised disposal facility.
- Food waste should be stored securely to avoid attracting scavenging fauna.
- Concrete wash-water, fuels, oils and other pollutants may not be discharged onto natural soil or vegetation.
- Fuel and hazardous substances must be appropriately contained and stored away from retained natural habitat.
- Any spill must be contained and cleaned immediately.

7.2.10. Rehabilitation of temporary disturbance

- Areas disturbed temporarily during construction must be rehabilitated as soon as they are no longer required.
- Topsoil from temporarily disturbed natural areas should be retained separately where practicable and reused during rehabilitation.
- Rehabilitation should use locally appropriate indigenous vegetation characteristic of Agulhas Limestone Fynbos.
- No invasive species may be used for rehabilitation.
- Natural recolonisation should be encouraged where surrounding indigenous vegetation provides an adequate seed source.
- Compacted soil should be loosened where necessary before rehabilitation.
- Rehabilitated areas should be monitored for erosion, poor vegetation establishment and invasive alien plant recruitment and should receive follow-up treatment where required.

7.2.11. Environmental induction and compliance

- All construction personnel must receive environmental induction before commencing work.
- Induction should cover the ecological sensitivity of Agulhas Limestone Fynbos, the status of Erf 80 as a conservation/no-go area, the potential occurrence of threatened fauna, procedures for animals encountered during construction, prohibition on killing snakes and other fauna and restrictions on access to retained natural habitat.
- The ECO should maintain records of significant fauna encountered during construction, rescue or relocation events, faunal mortality and unauthorised disturbance of Erf 80.
- Deliberate killing of indigenous fauna or repeated unauthorised disturbance of the conservation area must be treated as environmental non-compliance.
- The faunal specialist should be contacted where unexpected ecological issues arise that cannot be adequately addressed through the approved EMPr.

7.3. Palaeontology

Source: Palaeontological Impact Assessment (John Pether, 16 November 2026)

Excavations for foundations, services and stormwater into the upper Waenhuiskrans Formation may expose fossil bones and archaeological material, resulting in the permanent loss of palaeontological heritage. The intensity/sensitivity is rated Moderate and the probability Possible. The possible presence of fossils in the subsurface does not have an a priori influence on the decision to proceed with the proposed development. However, mitigation measures are essential.

7.3.1. Recommendations of the palaeontologist

- It is not feasible for a specialist monitor to be continuously present during the Construction Phases, when fossils may be unearthed at any time. The rescue of fossil bones during earth works critically depends on spotting this material as it is uncovered during digging.
- For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossils as excavations are being made.
- It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP), is included in the Environmental Management Plan (EMP) for the proposed development.
- The works supervisor/foreman and workers involved in excavating the building foundations, infrastructure trenches and stormwater drainage must be informed of the need to watch for fossils and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find.
- If a significant occurrence of fossil bones in a palaeontological context is discovered a professional palaeontologist must be appointed to collect them and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphic context and sedimentary geometry of the exposure, the sampling of ambient small fossil content and the compilation of the report for distribution to Heritage Western Cape, SAHRA, the approved curatorial institution and local heritage interest groups.
- A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

7.3.2. Fossil Finds Procedure (Appendix 2 of the PIA)

Monitoring

A constant monitoring presence over the period during which excavations for developments are made, by either an archaeologist or palaeontologist, is generally not practical. The field supervisor/foreman and workers involved in digging excavations must be encouraged and informed of the need to watch for potential fossil and buried archaeological material. Workers seeing potential objects are to report to the field supervisor who, in turn, will report to the ECO. The ECO will inform the archaeologist and/or palaeontologist contracted to be on standby in the case of fossil finds. To this end, responsible persons must be designated. These may include:

- The works supervisor/foreman, who is going to be most often on site.
- The Environmental Control Officer (ECO) for the project.
- The Project Manager/Site Agent.

Response by personnel in the event of fossil bone finds

The most important fossils of concern are the fossil bones and teeth of land animals. In the process of digging the excavations fossil bones may be spotted in the hole sides or bottom, or as they appear in excavated material on the spoil heap, such as in chunks of calcrete and aeolianite.

- Stop work at fossil find. The site foreman and ECO must be informed.
- Protect the find site from further disturbance and safeguard all fossil material in danger of being lost such as in the excavator bucket and scattered in the spoil heap. Fossil bone-bearing chunks of calcrete can be stockpiled in a safe location.
- The ECO or site agent must immediately inform the monitoring archaeologist who will liaise with Heritage Western Cape (HWC) and the contracted standby palaeontologist on the nature of the find and provide via email the information about the find, as detailed below.
    - Date
    - Position of the excavation (GPS) and depth.
    - A description of the nature of the find.
    - Digital images of the excavation showing vertical sections (sides) and the position of the find showing its depth/location in the excavation.
    - A reference scale must be included in the images (tape measure, ranging rod, or object of recorded dimensions).
    - Close-up, detailed images of the find (with scale included).

The Heritage Western Cape (HWC) and/or the contracted standby palaeontologist will assess the information and a suitable response will be established which will be reported to the developer and the ECO, such as whether rescue excavation or rescue collection by a palaeontologist is necessary or not. The response time/scheduling of the rescue fieldwork is to be decided in consultation with developer/owner and the ECO. It will probably be feasible to “leapfrog” the find and continue excavation farther along, so that the work schedule and machine time are minimally disrupted. The strategy is to rescue the material as quickly as possible.

Application for a permit to collect fossils

A permit from HWC and a Work Plan is required to excavate fossils. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit must be made to HWC immediately. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer’s expense.

7.4. Archaeological material and graves

Source: Heritage Impact Assessment (Cindy Postlethwayt, November 2026).

No structures, graves or burial sites are known on the site, and the HIA notes that the archaeological sensitivities of the Struisbaai area are generally found on the coastline, which this site is not. Buried archaeological material or human remains could nevertheless be exposed during earthworks. The following EAP measures apply:

- If any archaeological material, historical remains or human remains are exposed, all work in the vicinity must stop immediately and the area must be secured.
- The find must be reported to the ECO, who must inform HWC without delay.
- No such material or grave may be disturbed, moved or removed without a permit in terms of Sections 35 and 36 of the NHRA, and work in the affected area may not resume until HWC has authorised it in writing.
- The induction training and site protection procedures of the Fossil Finds Procedure apply equally to these finds.

7.5. Visual impacts during construction

Source: Draft Visual Impact Assessment (Terra+ Landscape Architects, 12 November 2026)

Negative visual impacts may be expected during the construction stage of the project, resulting directly from site establishment, clearance of fynbos, and earthworks for roads, services and building platforms, with construction vehicles, materials delivery and building activity causing noise, dust and temporary lighting and hoarding impacts. The construction of individual houses is likely to continue intermittently over several years. The impact is rated medium adverse before mitigation and low adverse after mitigation.

7.5.1. Mitigation measures: Phase 1, Planning, Design and Construction (Section 9.3.1 of the VIA)

The following design-related mitigation measures are recommended:

- The Architectural Guidelines must be adopted as a condition of approval and enforced through the Design Review Committee.
- The northern double storey zone (Erven 1, 26 to 38, 41 and 64 to 67) and the southern double storey zone (Erven 10 to 16) must be verified through the Google Earth Pro simulations. Where double storey houses would break the skyline from Viewpoints 6 and 7, or would loom over the existing houses from Viewpoints 1 and 2, the affected erven must be restricted to single storey, or the upper floor must be set back from the slope edge so that it is not seen against the sky.
- The single storey restriction and the 1.0 m platform limit on the ridge line erven (approximately Erven 4, 5, 22, 23, 44, 62 and 69) must be retained.
- On erven bordering Erf 80, buildings must observe the 3.0 m building line, boundaries must be visually open, and the erf edge must be planted with locally indigenous species continuous with the conservation area.
- Roofs must be dark grey or charcoal and matt; walls must be warm off-white, stone or timber. Brilliant white walls and reflective finishes must not be permitted, particularly on elevations facing north and north-east.
- The plant palette of the Master Landscape Plan must be revised. Species not indigenous to South Africa, such as *Rhaphiolepis indica* and *Westringia fruticosa*, should be removed, and riverine and forest trees (such as *Combretum erythrophyllum*, *Syzygium* spp. and *Curtisia dentata*) should be replaced with species suited to the exposed coastal conditions of the Agulhas plain, in consultation with the botanical specialist. Lawn should be limited as proposed in the guidelines, and the extensive lawns and hydrangeas shown in the renders should not be implemented.
- A planted buffer of naturally occurring species should be provided on the erf edges facing the existing houses on Noreen Street and Adelle Street, where possible within the street building lines.
- Street lighting should be low-level bollard lighting only, with no lighting on the edge of Erf 80. No floodlighting, uplighting or coloured lighting should be permitted.
- Clearance must be limited to the construction zone of each erf. Erf 80 and the open space must be fenced off during construction, and no stockpiling, access or dumping may take place there.

7.6. Construction traffic

Source: The Transport Impact Assessment (Innovative Transport Solutions, October 2026) did not assess construction-phase traffic.

Construction vehicles and heavy deliveries will temporarily increase traffic on Adelle Street and the local road network, with associated nuisance, dust, noise and road-safety risks for residents. The following EAP measures apply:

- Restrict deliveries and heavy vehicle movements to normal working hours (07:00 to 17:00 on weekdays) and avoid peak holiday periods (Easter and December) where practicable.
- Route heavy vehicles via Main Road (MR261) and Adelle Street, using the assessed site access approximately 90 m south of Lynn Street.
- Provide flag personnel and temporary signage at the site access during deliveries.
- Keep all construction vehicles, parking and material laydown within the site boundary and outside Erf 80, not on public roads.

- Clean spilled material and mud from public roads daily.
- Record the condition of Adelle Street before construction and repair any damage caused by construction vehicles.
- Notify adjoining residents of the construction programme and of abnormal deliveries.

7.7. Civil services and municipal infrastructure

Source: Civil Engineering Report, Roads and Services, Revision 2 (Icon Consulting Engineers, October 2026)

- No connections will be permitted by the municipality to any of the reservoir supply watermains, and care will be required during the construction phase that these watermains are not affected or damaged.
- The sewer and stormwater pipelines will be installed under the road surfaced area, but the water and ducting services will be installed behind the road edge. Where possible services will share trenches.
- The stormwater system from the proposed development will be managed through a stormwater dissipation, silt and debris trap to prevent any contamination of the existing municipal system.
- With the water shortages previously experienced in the Western Cape and the possibility of this shortage occurring again in the future, water saving and harvesting measures must be investigated and implemented for the proposed development.

EAP measures: the position of the two pipeline servitudes must be surveyed and pegged before earthworks, and no excavation, stockpiling or heavy vehicle crossing of the servitudes may take place except at approved crossing points. Services may not be routed through Erf 80 (faunal specialist: permanent services and infrastructure should remain within the approved development footprint).

8. POST-CONSTRUCTION PHASE IMPACTS AND MITIGATIONS

The following operational-phase measures are reproduced as written in the specialist reports. They must be carried into the HOA constitution, the title conditions and the estate management rules, so that they remain binding after construction.

8.1. Botanical and terrestrial biodiversity

Source: Botanical and Terrestrial Biodiversity Impact Assessment (Dr D.J. McDonald, Bergwind Botanical Surveys & Tours, October 2026)

Impact 3: Fragmentation, edge effects and disruption of ecological processes

The retained habitat would be affected by edge effects, the exclusion of fire, trampling, dumping, pets and the spread of the Argentine ant. In Alternative 2 the Nature Conservation Area has one developed edge and remains connected with RE/281, the impact have been assessed as Medium Negative, reduced to Low Negative if Erf 80 is managed together with the adjoining conservation area on RE/281. Proposed mitigation (Table 6 of the botanical report): Erf 80 to be managed with the adjoining RE/281 conservation area (Paapekuilsfontein Conservation Master Plan); firebreak on the developed edge only; controlled access; Argentine ant and pet control; fire management plan.

Impact 4: Spread of alien invasive plants

The development carries a Medium Negative risk of further alien invasion, reduced to Low Negative with an alien clearing programme. Proposed mitigation (Table 7 of the botanical report): alien clearing programme; removal of cut material; list of prohibited garden plants; indigenous landscaping.

The operational elements of measures 2 and 6 to 9 of Section 7.1 of this EMPr (Section 11.6 of the botanical report) apply in this phase.

8.1.1. Residual impacts and the Struisbaai Conservation Master Plan (Section 11.7 of the botanical report)

For Alternative 2 the residual impacts on Agulhas Limestone Fynbos [CR], the CBA1 and *Mimetes saxatilis* (EN) are Medium Negative, the level at which a biodiversity offset must be considered. The botanical specialist states that the Master Plan can only take the place of a biodiversity offset for Erf 3495 if the following conditions are met:

- The conservation areas must be legally secured in perpetuity, for example by declaration as a nature reserve or protected environment, a biodiversity stewardship agreement with CapeNature, or incorporation into Agulhas National Park, with a title deed restriction.
- A management plan with a responsible management authority and secured funding (alien clearing, fire management, access control) must be in place.
- The conservation areas, ecological corridors and feeder areas must be shown explicitly on the final Master Plan, with their extent, and the vegetation and SCC of the conservation areas must be verified in the field in the appropriate season.
- The securing of the conservation areas must be tied to the authorisation of Erf 3495 so that it is in place before, or at the same time as, the loss of habitat on Erf 3495.
- The same conservation areas will be presented as mitigation for the other developments in the Master Plan (The Ridge, the energy platform and the residential / light industrial area). The adequacy of the conservation areas must therefore be demonstrated against the combined residual impacts of all of these developments, not Erf 3495 alone.

If the conservation areas on RE/281 are not secured, a separate biodiversity offset for Erf 3495 would be required. The determination of whether the Master Plan is an adequate substitute for a biodiversity offset rests with the competent authority, informed by CapeNature and SANParks. The Paapekuilsfontein Conservation Master Plan is a draft concept option, to be further refined with input from SANParks and CapeNature.

8.2. Terrestrial animal species

Source: Terrestrial Animal Species Specialist Assessment (Venter & Swart, November 2026, Version 3)

The operational-phase impacts are habitat fragmentation and reduced landscape connectivity, and operational disturbance and degradation of retained faunal habitat (lighting, traffic, people, domestic animals and other disturbance). Under Alternative 2 they are Medium–High Negative before mitigation and Medium Negative after mitigation. The configuration in which the security perimeter encloses the residential component while Erf 80 remains connected to the broader conservation landscape has a Low Negative residual fencing-related impact; enclosing Erf 80 within the estate perimeter would leave a Medium Negative residual fencing-related impact. The operational measures are reproduced as written:

8.2.1. Broader Paapekuilsfontein conservation framework

- The broader Paapekuilsfontein Conservation Master Plan should be implemented as a landscape-scale component of the mitigation associated with Erf 3495.
- Its principal ecological role is to retain and manage substantially larger areas of connected natural habitat than can be secured within Erf 3495 alone. This is particularly important for maintaining faunal movement, dispersal, access to resources, recolonisation and ecological processes across a landscape affected by habitat transformation and fragmentation.
- Erf 80 should function as part of this broader network. Management of the area should therefore be coordinated with conservation management elsewhere on Paapekuilsfontein, particularly in relation to alien vegetation control, rehabilitation, fire management and maintenance of ecological connectivity.
- Conservation areas and ecological corridors identified through the broader framework should be clearly delineated and incorporated into appropriate long-term land-management arrangements.

- Future development within the wider Paapekuilsfontein property should be planned in relation to this conservation network so that ecological connections are not progressively narrowed or lost through successive development proposals.
- The broader conservation framework provides additional mitigation for cumulative fragmentation and loss of landscape connectivity. Permanent loss of natural habitat within the authorised Erf 3495 development footprint remains a residual impact. The regulatory treatment of the broader conservation measures, including whether any additional conservation mechanism is required, should be determined through the environmental authorisation process by the competent authority, informed by the relevant conservation authorities.

8.2.2. Landscape connectivity and security fencing

- Erf 3495 forms part of a wider connected natural landscape and Erf 80 is intended to contribute to this landscape-scale conservation network.
- Cape Grysbok was recorded on the property, and Angulate Tortoise, reptiles and other terrestrial fauna also depend on the ability to move between suitable habitat patches.
- Maintenance of landscape permeability is therefore relevant both to larger terrestrial animals and to smaller ground-dwelling fauna.
- The development is proposed as an access-controlled private residential estate and security fencing will form part of the development.
- From a faunal perspective, the preferred configuration is for the security perimeter to enclose the residential development and associated private infrastructure while leaving Erf 80 connected to adjoining natural habitat within the broader Paapekuilsfontein conservation landscape.
- This configuration should be incorporated into the final fencing design where practicable. It retains a direct ecological connection between Erf 80 and the wider conservation network and avoids turning the conservation area into an isolated habitat patch within the estate.
- If security fencing must cross an ecological connection between Erf 80 and adjoining natural habitat, appropriate fauna-permeability measures should be incorporated. The dimensions, spacing and location of fauna passages should respond to the terrestrial fauna likely to use the interface.
- Fauna-permeability measures should accommodate smaller terrestrial species and, where feasible, larger animals such as Cape Grysbok.
- Fauna passages must remain functional throughout the operational phase and may not subsequently be blocked by landscaping, security modifications or estate management practices.
- Any electrification must be designed so that designated fauna passages do not create mortality risks.
- Solid walls should be avoided along conservation interfaces where a permeable security treatment can provide the required security function.
- The final fence layout should also consider the potential movement connection towards municipal open-space areas to the north-east of Erf 3495.
- Where the full Erf 3495 boundary, including Erf 80, is enclosed within the security perimeter, fauna-permeable design can reduce the impact but will not fully reproduce the ecological permeability of a direct unfenced connection. This configuration therefore remains less favourable from a faunal perspective.

8.2.3. Roads and vehicle movement

- Construction vehicles must remain on approved routes and within the authorised construction area.
- Internal estate roads adjoining Erf 80 and other retained natural habitat should operate at low speeds. A maximum speed of 30 km/h is recommended for these areas.
- Traffic-calming measures should be incorporated where required to achieve low operating speeds.
- Construction personnel and future residents should be made aware of the possible presence of tortoises, snakes and other slow-moving fauna on internal roads.

- Animals encountered on roads should be allowed to cross safely where this can be done without creating a safety risk.
- Off-road driving within Erf 80 must be prohibited except where required for approved conservation management.

8.2.4. Alien vegetation management

- Alien vegetation is already an important source of habitat degradation on Erf 3495, particularly *Acacia cyclops* and, to a lesser extent, *Acacia saligna*.
- A coordinated alien vegetation management programme should be implemented within Erf 80 and other retained natural habitat.
- Initial clearing must be followed by systematic follow-up control. One-off clearing will not provide an adequate ecological outcome.
- Alien clearing should minimise unnecessary disturbance to indigenous vegetation, natural soil surfaces and faunal refugia.
- Dense alien stands may be cleared progressively where this assists fauna displacement and limits abrupt removal of all cover.
- Herbicide application, where required, should be targeted and should avoid unnecessary impacts on surrounding indigenous vegetation.
- Alien seedlings and invasive ornamental species spreading from residential gardens must be controlled before they become established within Erf 80.
- Garden refuse may not be dumped within the conservation area.
- Alien vegetation management within Erf 80 should be coordinated with management across the broader Paapekuilsfontein conservation landscape.

8.2.5. Fire management

- Agulhas Limestone Fynbos is a fire-dependent ecosystem and appropriate fire regimes are important for maintaining vegetation structure, ecological succession and habitat suitable for several faunal receptors assessed in this report.
- Erf 80 should be incorporated into a broader ecological fire-management approach for the Paapekuilsfontein conservation landscape.
- Long-term exclusion of fire should be avoided where this results in ecologically inappropriate vegetation senescence and declining habitat quality.
- Burning should be planned according to vegetation condition, fuel age and ecological requirements, while complying with applicable fire legislation and safety requirements.
- Individual residents may not undertake burning within Erf 80.
- Firebreaks and other fire-management infrastructure should be positioned to minimise unnecessary additional loss of natural vegetation.
- Post-fire recruitment of Acacia and other alien vegetation must be actively controlled.
- Vegetation recovery following fire should be monitored to ensure that the conservation area returns to indigenous fynbos and is not progressively replaced by invasive vegetation.

8.2.6. Artificial lighting

- Artificial lighting can affect nocturnal fauna, insects and birds and should be carefully controlled along the interface between the residential estate and retained natural habitat.
- External lighting should be limited to that required for safety and security.
- Lighting adjacent to Erf 80 should be downward-directed and shielded to minimise spill into natural habitat.
- High-intensity floodlighting of the conservation-area interface should be avoided.
- Security lighting should use the lowest intensity capable of achieving the required security function.
- Warm-spectrum lighting should be used where practicable.

- Motion-activated lighting should be used where continuous illumination is unnecessary.

8.2.7. Domestic animals

- Domestic animals represent a long-term operational risk to reptiles, small mammals and ground-dwelling birds.
- Free-ranging dogs must not be permitted within Erf 80.
- Dogs outside private residential erven should be effectively controlled and should be leashed where they have access to areas adjoining the conservation area.
- Free-roaming domestic cats should be prohibited or tightly controlled through estate rules because of their potential to prey on birds, reptiles, small mammals and invertebrates.
- Residents may not deliberately encourage domestic animals into Erf 80.
- Estate management rules should provide a clear mechanism for dealing with repeated non-compliance involving domestic animals and conservation areas.

8.2.8. Stormwater and erosion

- Stormwater from roads and residential areas must be managed so that concentrated runoff does not cause erosion, sedimentation or habitat degradation within Erf 80.
- Clean stormwater should be dispersed in a manner that maintains natural drainage patterns as far as practicable.
- Contaminated runoff from roads, construction areas, concrete works or other potentially polluted surfaces may not be discharged directly into retained natural habitat.
- Stormwater structures should avoid creating permanent traps for terrestrial fauna.
- Erosion developing along the development–conservation interface must be repaired promptly and affected areas rehabilitated.

8.2.9. Landscaping and gardens

- Landscaping within the residential estate should support the ecological objectives of the development and reduce the risk of secondary degradation of Erf 80.
- Locally indigenous species should be strongly favoured, particularly in private open spaces and gardens adjoining natural habitat.
- Invasive or potentially invasive plant species may not be planted.
- Garden refuse, soil, lawn clippings and other landscaping material may not be dumped within Erf 80.
- Residents may not remove indigenous vegetation, rocks or other natural material from Erf 80 for landscaping purposes.
- Irrigation and fertiliser use adjacent to Erf 80 should be managed so that nutrient-rich runoff does not enter the conservation area.

8.2.10. Pesticides and rodenticides

- Pest control within the estate should follow an integrated pest-management approach.
- Routine broad-spectrum pesticide application should be avoided adjacent to Erf 80 and may not be undertaken within the conservation area.
- Second-generation anticoagulant rodenticides should be avoided because poisoned rodents may create secondary poisoning risks for raptors and other predators.
- Where rodent control is necessary, methods that minimise secondary poisoning and risks to non-target fauna should be used.
- Herbicide use within Erf 80 should be limited to targeted invasive alien vegetation management.

8.2.11. Long-term management and monitoring

- Retention of Erf 80 on the development layout will only provide a meaningful conservation outcome if the area is actively managed over the long term.
- Responsibility for implementation should be clearly assigned to the estate management body or another designated land-management entity.
- Long-term management should address invasive alien vegetation, rehabilitation, fire, access control, fencing and fauna permeability, erosion, domestic animals, waste and general habitat condition.
- Management of Erf 80 should be coordinated with conservation management on the broader Paapekuilsfontein property.
- Operational monitoring should include:
    - alien vegetation condition and follow-up control;
    - rehabilitation success;
    - erosion and stormwater impacts;
    - encroachment from adjoining residential areas;
    - functionality of fauna passages associated with perimeter fencing;
    - evidence of faunal mortality associated with roads or fencing;
    - effects of domestic animals;
    - excessive light spill into natural habitat;
    - dumping or unauthorised access; and
    - emerging ecological issues requiring corrective management.
- Where monitoring identifies impacts greater than anticipated, management should be adapted. Corrective measures may include modification of fencing or fauna passages, additional alien clearing, rehabilitation, changes to lighting, improved erosion control or stricter management of access and domestic animals.

8.3. Visual impacts during operation

Source: Draft Visual Impact Assessment (Terra+ Landscape Architects, 12 November 2026)

Negative impacts are expected in terms of the extension of the town onto the crest of the rise, the loss of natural fynbos, and the visual intrusion of houses into the outlook of the adjoining residents, with a new skyline formed by the northern row of houses at the brow of Erf 80 and light at night on a currently dark edge. The impact is rated moderate adverse before mitigation and low to moderate negative after mitigation.

8.3.1. Mitigation: general measures (Section 9.2 of the VIA)

The mitigation measures must form an integrated part of the overall site management plan, be included in the Home Owners' Association constitution and title conditions and be timed and programmed with the construction period of the development. It is recommended that the Master Landscape Plan be developed into a detailed Landscape Plan by a Registered Professional Landscape Architect prior to construction. This plan should typically address the following:

- Existing vegetation to be retained on Erf 80, Erf 78, the open space corridors and the erf edges, and the method of protection during construction
- Plant rescue and the reuse of topsoil and seed-bearing material in rehabilitation
- A planting palette of locally indigenous coastal fynbos and thicket species suited to the limestone and sand conditions and the wind exposure of the site
- Street and open space planting that is low and open in character, so that the servitude corridors remain view lines
- Lighting specifications for streets and the open space, including fixture shielding and colour temperature

8.3.2. Mitigation measures: Phase 2, Operational (Section 9.3.2 of the VIA)

- Erf 80 must be managed as a conservation area, with alien clearing and fire management, and no private access, structures or clearing.
- Landscape planting must be maintained and replaced where establishment fails.
- The Design Review Committee must review all house designs, including additions and alterations, against the guidelines and the recommendations of this report.
- Lighting must be monitored for compliance with the guidelines.

8.4. Traffic and access

Source: Transport Impact Assessment (Innovative Transport Solutions, October 2026)

The development is expected to generate 71 weekday a.m. peak hour trips (18 inbound / 53 outbound) and 71 weekday p.m. peak hour trips (50 inbound / 21 outbound). The conclusions and recommendations of the TIA are reproduced as written:

- **Site Access:** Access is proposed off Adelle Street spaced approximately 90 metres to the south of the Lynn Street intersection. Single ingress and egress lanes are proposed for the development. Approximately 30m stacking is available, which is sufficient. There is sufficient shoulder sight distance available along Adelle Street from the access.
- Based on the results of a queuing analysis for the p.m. peak hour with 50 vehicles entering the site, there is a 97 percent probability for three vehicles or less in the queue with a 24 seconds per vehicle service rate and it is recommended that at least 21m stacking distance be provided.
- The required shoulder sight distance (SSD) along a road with a 60km/h posted speed is 120m for passenger cars. The available SSD along Adelle Street from the access is more than 120m in both directions, which is sufficient.
- **Parking:** Parking should be provided in accordance with the local zoning scheme requirements.
- **Pedestrians and Public Transport:** No dedicated NMT and public transport facilities are recommended for the proposed development.
- **30th Highest Traffic Hour:** This is typically the traffic conditions during Easter Weekend. It is expected that there will be periods with high congestion at some intersections during the peak holiday period. However, this will only occur for a short period during the year, and it does not justify any major road or intersection upgrades.
- Based on the above investigation, it is evident that the expected transport impacts from the planned development will be low. The current road network with the existing intersection geometry and controls can accommodate the proposed development, without any road improvements.

EAP measures: walls, signage, landscaping and parked vehicles must be kept clear of the 120 m sight lines at the access; any access gate or control point must be set back at least 21 m from Adelle Street; and internal roads adjoining Erf 80 must operate at a maximum of 30 km/h (faunal specialist).

8.5. Heritage and sense of place

Source: Heritage Impact Assessment (Cindy Postlethwayt, October 2026)

The HIA identifies contextual and natural significance as the primary heritage informants. It is recommended that Heritage Western Cape:

- Endorses this report as having met the requirements of Section 38(3) of the NHRA;
- In terms of Section 38(8) of the NHRA supports the proposed development on Erf 3495 on condition that:
    - The Architectural Guidelines and Landscape Master Plan should be refined/finalised to ensure congruity and to incorporate the recommendations of this report, including the Mitigations, with particular attention to the double storey zones on the northern and southern edges, the plant palette and lighting.

- The simulations from Viewpoints 1 to 12 should be developed to assess and test the proposed mitigation measures.
- Once these visual simulations and congruent, revised Landscape Master Plan and Architectural Guidelines are completed, they should be submitted to the Visual Impact Assessor for final visual impact assessment, to be submitted for ratification by HWC.
- Final plans are generally in accordance with the layout and development guidelines for Erf 3495, Struisbaai, as shown on Alternative 2 and included as Annexure G to this report, as mitigated, refined and supported by HWC.
- The mitigation measures listed in Section 15 of this report are included as conditions of the Environmental Authorisation and implemented.

The mitigation measures in Section 15 of the HIA comprise the palaeontological, botanical and visual measures reproduced in Sections 7 and 8 of this EMPr.

Table 7. Activity-specific impacts and mitigations

PRE-CONSTRUCTION, CONSTRUCTION AND POST-CONSTRUCTION PHASES			
IMPACT	**DESCRIPTION**	**MITIGATION MEASURES**	**RESPONSIBLE PERSONS**
Socio-economic	***Construction*** Job creation during the construction of civil services and dwellings.	- Source labour locally as far as possible. - Consider gender balance when sourcing labour.	Applicant / Contractor / ECO
Loss of Critically Endangered vegetation and CBA1 habitat	***Construction*** Permanent clearing of approximately 8.15 ha of Agulhas Limestone Fynbos [CR] in a CBA1.	- Spring census of *Mimetes saxatilis* and adjustment of the Erf 80 boundary before the layout is finalised. - Demarcate the construction footprint and survey the Erf 80 boundary before clearing; Erf 80 is a no-go area. - Search and rescue of transplantable species, seed collection of Proteaceae, and topsoil stripping and reuse. - Secure the Master Plan conservation areas, subject to the botanical specialist's conditions, or a separate offset. - See Sections 7.1 and 8.1.	Applicant / Contractor / ECO Botanical specialist
Faunal disturbance and mortality	***Construction*** Displacement and mortality of reptiles (including Southern Adder), tortoises, golden moles and ground-nesting birds during clearing and excavation.	- Pre-construction faunal inspection immediately before clearing. - Progressive clearing towards retained habitat; nest checks; avoid the breeding season. - Stop work for snakes and other fauna; snakes may not be killed. - Close trenches promptly; escape ramps; daily inspection of excavations. - See Section 7.2.	Applicant / Contractor / ECO Faunal specialist
Fragmentation and loss of connectivity	***Operation*** Edge effects, fencing, lighting, domestic animals and fire exclusion affecting Erf 80 and RE/281.	- Security perimeter to enclose the residential component, leaving Erf 80 connected to RE/281; fauna passages where fencing crosses movement routes. - Low, shielded, warm-spectrum lighting; none on the Erf 80 edge. - Control of dogs and cats; integrated pest management. - Fire management plan with firebreaks on the developed edge. - See Sections 8.1 and 8.2.	Applicant / HOA
Alien invasive plants	***Construction and Operation*** Spread of *Acacia cyclops*, *A. saligna*, *Myoporum* sp. and garden escapes into Erf 80 and RE/281.	- Clear the whole erf before construction; remove all cut material from site. - Systematic follow-up clearing in Erf 80. - Prohibited plant list in the HOA constitution.	Applicant / Contractor / ECO HOA

Palaeontology	***Construction*** Loss of fossil bones in the Waenhuiskrans Formation during excavations.	- Implement the Fossil Finds Procedure; brief excavation personnel; designate responsible persons. - Stop work at a find; notify the ECO, HWC and the standby palaeontologist. - See Section 7.3.	Applicant / Contractor / ECO Palaeontologist
Archaeology and graves	***Construction*** Exposure of buried archaeological material or human remains.	- Stop work, secure the area and report to the ECO and HWC; no disturbance without a permit under Sections 35 and 36 of the NHRA.	Applicant / Contractor / ECO
Visual	Construction and operation Construction activity on an elevated, open site; new residential edge and skyline at the brow of Erf 80; light at night.	- Limit clearance to the construction zone of each erf; fence off Erf 80 and the open space. - Verify the double storey zones by simulation; single storey and 1.0 m platform limit on the ridge line erven. - Dark matt roofs; warm off-white, stone or timber walls. - Revised indigenous plant palette; planted buffer facing Noreen and Adelle Streets. - See Sections 7.5, 8.3 and 10.	Applicant / Contractor / ECO Design Review Committee / HOA
Dust	Construction Dust from clearing, earthworks and exposed surfaces on a windy coastal site.	- Clear building sites progressively and keep ground cover as long as possible. - Cover loads and fine stockpiles; damp down with non-potable water. - Low speeds on site; sweep roads.	Applicant / Contractor / ECO
Noise	Construction Noise from vehicles and machinery adjoining existing homes.	- Restrict construction to normal working hours. - Maintain machinery and fit silencers; provide ear protection.	Applicant / Contractor / ECO
Traffic	Construction and operation Construction traffic on Adelle Street; 71 peak-hour trips during operation.	- Single access off Adelle Street approximately 90 m south of Lynn Street at least 21 m stacking; 120 m sight distance kept clear. - Construction traffic controls (working hours, routing, flag personnel, road cleaning and repair). - See Sections 7.6 and 8.4.	Applicant / Contractor / ECO
Municipal infrastructure	Construction Damage to the reservoir supply watermains in the pipeline servitudes.	- Survey and peg the servitudes; no excavation, stockpiling or heavy vehicle crossing except at approved points; no connections to the reservoir mains.	Applicant / Contractor / ECO Civil engineer
Stormwater and erosion	Construction and operation Concentrated runoff and erosion into Erf 80 and downslope properties.	- Attenuate to pre-development flows; silt and debris traps. - No polluted runoff into natural habitat; repair erosion promptly.	Applicant / Contractor / ECO HOA

Fire	All phases High fuel load of senescent fynbos and cut *Acacia* adjacent to homes; construction fire risk.	- Remove cut alien material; fire management plan; firebreaks on the developed edge. - No open fires on site; firefighting equipment and a Fire Officer.	Applicant / Contractor / ECO HOA
Waste and pollution	Construction and operation Litter, rubble, hydrocarbons and cement wash-water; dumping in Erf 80.	- Designated waste and wash-down areas outside Erf 80; spill kits; disposal at licensed facilities. - No dumping of rubble, garden refuse or waste in Erf 80.	Applicant / Contractor / ECO HOA

9. GENERAL CONSTRUCTION PHASE IMPACTS AND REQUIREMENTS

9.1. Contractor's camp

Responsibility – Project Manager / Contractor / ECO / owner

- The contractor's camp, laydown areas, stockpiles, batching and parking must be located within the approved development footprint, in a transformed area approved by the ECO, and may not be placed in Erf 80, in the private open space or on the pipeline servitudes.
- The contractor shall comply with all relevant laws and regulations concerning water provision, sanitation, wastewater discharge and liquid and solid waste handling and disposal during construction.
- Chemical toilets must be provided at a ratio of at least one toilet per 15 workers, serviced regularly by a licensed service provider, and secured against wind.
- No overnight accommodation of workers is permitted on site, other than a security guard.
- Food waste must be stored securely to avoid attracting scavenging fauna.

9.2. Health and safety

Responsibility – Project Manager / Contractor / ECO / owner

Correct Personal Protective Equipment (PPE) must be worn at all times by personnel on site, and personnel must be trained on the use of PPE. The applicant will appoint a Safety Officer for the construction phase, and all activities must comply with the Occupational Health and Safety Act (Act No. 85 of 1993) and the Construction Regulations, 2014.

9.3. Fire risk management

Responsibility – Project Manager / Contractor / ECO / owner

- The Applicant / Project Manager / Contractor must identify a Fire Officer who shall be responsible for ensuring immediate and appropriate actions in the event of a fire and shall ensure that employees are aware of the procedure to be followed.
- No open fires, braais or burning of waste or vegetation are permitted on site. Smoking is permitted only in designated areas away from vegetation, with butt containers.
- Firefighting equipment (fire extinguishers and water) must be available at the contractor's camp and at all welding, grinding and cutting operations, which must not take place within 5 m of natural vegetation without a fire watch.
- Cut alien material and woodcutters' debris must be removed from site and not left in situ, as it forms masses of dry fuel.
- The fire management plan must be prepared in consultation with the local fire protection association and CapeNature, in compliance with the National Veld and Forest Fire Act (Act No. 101 of 1998).

9.4. Fuels and hazardous materials

Responsibility – Project Manager / Contractor / owner

- All fuels and flammable or hazardous materials shall be stored in a suitable, designated storage area within the contractor's camp, away from Erf 80 and retained natural habitat.
- Storage areas shall be constructed using impervious materials to prevent the contamination of soil and groundwater in the event of spillage or leakage.
- The quantity of fuels and hazardous materials stored on site at any given time shall be limited to that reasonably required for construction activities.

- Bulk fuel shall be stored within a bunded area with a holding capacity of no less than 110% of the volume of the largest container.
- A spill kit and appropriate containment materials shall be kept readily available near fuel and hazardous material storage areas.
- All relevant Safety Data Sheets (SDS) shall be kept on site and readily accessible.
- Any spillage or leakage shall be reported immediately to the ECO and remediated in accordance with the emergency protocol.

9.5. Emergencies protocol

Responsibility – Project Manager / Contractor / owner

Fire: The Fire Officer, or another designated person, shall be notified immediately in the event of a fire. All employees shall be familiar with the fire emergency procedure, evacuation routes, assembly points and the location and use of firefighting equipment.

Hydrocarbon leaks and spillages: Any vehicle leaking fuel or oil shall be removed to the designated maintenance area and repaired before further use. Contaminated soil shall be excavated and disposed of at a licensed facility. The clean-up of any spillage, and remediation of any resultant damage, shall be for the account of the Applicant or the relevant Contractor.

Sewage spills from portable toilets: All employees shall be familiar with the procedure for responding to sewage spills, and materials for containment and clean-up shall be kept on site.

Snakes: Snakes may not be killed. If a snake is encountered, work in the immediate area must stop until the animal has moved away or has been safely removed by a competent snake handler. Emergency numbers, including the nearest medical facility able to administer antivenom, must be displayed on site, and employees must be inducted on basic snakebite first aid.

Fossil or archaeological finds: Follow the Fossil Finds Procedure in Section 7.3 and the measures in Section 7.4.

9.6. Site demarcation

Responsibility – Project Manager / Contractor / ECO / owner

- Prior to the commencement of any construction activity, the boundary of Erf 80 must be surveyed and clearly demarcated, and the boundaries of the overall construction site and the individual construction footprints must be pegged and demarcated.
- Erf 80 must be fenced off for the duration of construction and treated as a strict no-go area, with appropriate signage, apart from approved conservation management activities.
- The two 10 m pipeline servitudes and the private open space must be demarcated as no-go areas for stockpiling and storage.
- Before work starts on each erf, the ECO marks out a construction zone around the house, a maximum of 5 m from the building on the street side and 3 m on the other sides. Builders, vehicles, materials and spoil must stay inside this zone and off neighbouring erven and open spaces.
- Demarcation measures shall be inspected and maintained by the ECO throughout construction and reinstated promptly if damaged or removed.
- No vehicles, machinery, personnel or materials shall enter a demarcated no-go area at any time, except with the prior written approval of the ECO for approved conservation management.

9.7. Stockpiles

Responsibility – Project Manager / Contractor / ECO / owner

- Stockpile sites shall be identified and demarcated within the development footprint prior to construction, on gentle gradients and away from Erf 80, the servitudes and the site boundaries.

- Topsoil and subsoil shall be stockpiled separately. Topsoil stockpiles shall not exceed 1.5 m in height and shall be protected from wind and water erosion.
- Stockpiles shall be monitored for dust, runoff and erosion, and damped down where necessary.
- Stockpiles may not be located within Erf 80, the private open space or the pipeline servitudes.

9.8. General waste

Responsibility – Project Manager / Contractor / ECO / owner

- All refuse shall be stored in a designated area in watertight, windproof and scavenger-proof receptacles, clearly labelled for general waste, recyclables and hazardous waste.
- Refuse shall be removed regularly and disposed of at a permitted waste disposal facility. Disposal certificates shall be retained and made available to the ECO.
- The burning or burial of refuse on site is strictly prohibited.
- No spoil, rubble, household waste, garden waste or construction material may be deposited within Erf 80 (faunal specialist).
- The site shall be kept clean and free of litter at all times, with regular litter patrols, particularly on windy days.

9.9. Recreational and eating areas

Responsibility – Project Manager / Contractor / ECO / owner

- Designated eating and rest areas, approved by the ECO, must be provided within the development footprint, with refuse bins cleared daily.
- No rest, eating or recreational areas shall be permitted within Erf 80 or any demarcated no-go area.

9.10. Construction water

Responsibility – Project Manager / Contractor / ECO / owner

- All cement effluent from mixer washings and batching areas shall be contained in lined wash-down areas within the development footprint, away from Erf 80, and the solids disposed of at a permitted facility.
- Concrete wash-water, fuels, oils and other pollutants may not be discharged onto natural soil or vegetation (faunal specialist).
- Construction activities such as watering, mixing and cleaning must avoid water wastage, and non-potable water must be used for dust suppression where available.

9.11. Equipment maintenance

Responsibility – Project Manager / Contractor / ECO / owner

- All equipment and vehicles shall be serviced and refuelled only within designated maintenance areas on impervious surfaces or drip trays.
- Equipment shall be inspected regularly for leaks, and leaking equipment shall be repaired or removed from site.
- No servicing, refuelling or maintenance may take place within Erf 80 or any no-go area.

9.12. Stormwater management

Responsibility – Project Manager / Contractor / ECO / owner

- Temporary stormwater controls (cut-off berms, sediment fences or silt traps) must be installed before earthworks, so that concentrated runoff does not enter Erf 80, the servitudes or neighbouring properties.

- The permanent system must be constructed as designed: piped minor system for the 2-year event, 100-year event in the road reserves and open spaces, attenuation to pre-development flows, and a dissipation, silt and debris trap before discharge to the municipal system at Adelle Street and Karen Close.
- Erven must be shaped so that stormwater drains towards the street system, and stormwater may not be discharged onto neighbouring erven, Erf 80 or private open space (Architectural Guidelines).

9.13. Topsoil removal and stockpiling

Responsibility – Project Manager / Contractor / ECO / owner

Topsoil from the footprint should be stripped and re-used on road verges and private open space to retain the soil seed bank (botanical specialist). Topsoil must be stripped before excavation, stockpiled separately from subsoil, and stabilised within a day of stockpiling. Topsoil may not be mixed with rubble, waste or subsoil.

9.14. Erosion control

Responsibility – Project Manager / Contractor / ECO / owner

Action must be taken to prevent erosion of soils on the construction site. Should any erosion be detected, the cause must be identified and remedial action taken immediately. Erosion developing along the development–conservation interface must be repaired promptly and affected areas rehabilitated (faunal specialist).

9.15. Dust control

Responsibility – Project Manager / Contractor / ECO / owner

Appropriate action must be taken to minimise the generation of dust, which is a particular risk on this exposed coastal site. Measures include progressive clearing, damping of exposed areas with non-potable water, covering of fine stockpiles and loads, low vehicle speeds on site, and suspension of dust-generating activities during strong winds.

9.16. Noise and working hours

Responsibility – Project Manager / Contractor / ECO / owner

Construction must be restricted to normal working hours (07:00 to 17:00 on weekdays and 08:00 to 13:00 on Saturdays, or as prescribed by the Cape Agulhas Municipality), with no work on Sundays and public holidays unless approved. Machinery must be maintained and fitted with silencers, and workers must be provided with hearing protection.

9.17. Construction traffic management

Responsibility – Project Manager / Contractor / ECO / owner

All construction vehicles carrying materials must use sheeting or a suitable cover. Construction vehicles must remain on approved routes and within the authorised construction area (faunal specialist), and the construction traffic measures in Section 7.6 apply.

9.18. Sustainable building and resource use

Responsibility – Project Manager / Contractor / ECO / owner

- Every house must have a rainwater tank of at least 5 000 litres, fed from the roof and used for garden irrigation and flushing; tanks must be buried or screened (Architectural Guidelines 9.1).
- Water-wise fittings throughout: low-flow shower heads, aerators or flow restrictors on all taps, and dual-flush toilets. Grey water systems are encouraged.

- Glazing must comply with SANS 10400-N and XA (energy efficiency). Solar PV panels are encouraged, laid flat on the roof at the same pitch, with black or dark grey frames (Architectural Guidelines 6.1 and 9.3).
- Energy-efficient (LED) lighting with warm white light of 3 000 K or less (Architectural Guidelines 9.4).
- North orientation of well-used spaces, roof and wall insulation, suitable roof overhangs and natural ventilation are encouraged.

9.19. Site clean-up and rehabilitation

Responsibility – Project Manager / Contractor / ECO / owner

- The construction footprint must be restored to natural contours as far as possible, allowing normal surface drainage.
- No rubble, waste or hazardous material may be mixed with topsoil or used as backfill.
- Compacted soil should be loosened where necessary before rehabilitation (faunal specialist).
- Rehabilitation should use locally appropriate indigenous vegetation characteristic of Agulhas Limestone Fynbos. No invasive species may be used for rehabilitation (faunal specialist).
- All temporary structures, equipment, materials and fencing used during construction must be removed, apart from the permanent Erf 80 fence.
- Rehabilitated areas should be monitored for erosion, poor vegetation establishment and invasive alien plant recruitment and should receive follow-up treatment where required (faunal specialist).

10. ARCHITECTURAL AND LANDSCAPE DESIGN GUIDELINES

All dwellings and external works must comply with the Erf 3495 Architectural Guidelines. The guidelines sit alongside the Cape Agulhas Integrated Zoning Scheme and the National Building Regulations (SANS 10400); where the guidelines are stricter, the guidelines apply. The key requirements are summarised below. The guidelines must be refined to incorporate the specialist recommendations in this EMPr (in particular the visual simulations, the double storey zones, the plant palette and lighting), submitted to the visual specialist and HWC for ratification, and attached to the HOA constitution and title conditions. Items marked [PROPOSED] in the guidelines are to be confirmed in the final version.

10.1. Design intent

The architectural language is one of simple, contemporary coastal buildings that take their cue from the regional vernacular without copying it: houses made up of a few simple, narrow, pitched-roof forms, linked by lighter, lower elements; low, horizontal buildings that step with the slope; a restrained palette of warm off-white render, local limestone, weathered timber and dark grey roofs; minimal night lighting; and gardens planted with locally indigenous species. Tuscan, Georgian, Cape Dutch, Victorian or any other revivalist or period style will not be approved.

10.2. Building envelope

Table 8. Building lines, footprint and height

Control	Single storey zone	Double storey zone
Erven	2–9, 17–25, 39, 40, 42–63, 68–71 (45 erven)	North: 1, 26–38, 41, 64–67 (19); South: 10–16 (7)
Maximum height above natural ground level (NGL)	6.0 m	7.5 m
Maximum height to wall plate (from ground floor FFL)	3.3 m	6.0 m
Upper floor area	Not permitted (no rooms in the roof space [PROPOSED])	Maximum 50% of ground floor footprint
Verandahs and lean-tos at eaves	3.5 m above floor below	3.5 m above floor below

Control	Single storey zone	Double storey zone
Building lines	Street 4.0 m; side 2.0 m; rear 2.0 m; boundary with Erf 80 or private open space 3.0 m [PROPOSED]	As for single storey zone
Maximum footprint	Band A (≤ 749 m²): 300 m²; Band B (750–999 m²): 350 m²; Band C (≥ 1 000 m²): 400 m²	As for single storey zone
Maximum coverage	50% (the smaller of the footprint and coverage limits applies)	50%
Platforms	Ground floor platforms may not be raised more than 1.0 m above NGL at any point [PROPOSED], especially on the ridge line erven (approximately Erven 4, 5, 22, 23, 44, 62 and 69)	As for single storey zone

- Height is measured from NGL directly below each point of the building, based on the pre-earthworks survey by Geomatics Africa. Platforms raised by fill do not create a new NGL.
- No unbroken wall or glass surface (excluding gable ends) may be taller than 6.0 m above finished ground. Exposed basement walls count towards the height limit.
- The two 10 m pipeline servitudes may not be encroached on by any private structure, wall, pool, tank or deep-rooted planting.
- Erven that back onto Erf 80 or private open space must keep this edge open and planted. Solid boundary walls are not allowed on these edges.

10.3. Built form, roofs, doors and windows

- Major forms must be rectangular, a maximum of 6.5 m wide, with a length of at least 1.5 times the width, at right angles to each other, with double-pitched roofs. On sloping erven, forms should step down with the ground.
- Garages should be set back from the main street facade or placed at right angles to the street.
- Decorative plaster mouldings, quoins and rustication are not allowed. Chimneys must be simple and rectangular.
- Major roofs: double-pitched with a central ridge, pitch 17.5° to 40°; no hips or valleys joining major forms; no hipped main roofs or parapet gables; clipped eaves on gables.
- Minor roofs: lean-to and verandah roofs 3° to 10°, maximum depth 6.5 m; flat concrete roofs with parapets (minimum 250 mm) for a maximum of 20% of the footprint, finished in brown or grey stone chips; planted flat roofs encouraged.
- Roof windows flat in the roof plane, maximum 780 × 1 400 mm. Gutters and downpipes in pre-coated aluminium to match the roof or walls.
- Openings rectangular, no arches, no reflective or mirror glass; large glazing set back behind verandahs, balconies, deep reveals or pergolas.
- No external burglar bars or external “Trellidor” type security gates.

10.4. External elements

- Down-slope retaining walls and terrace edges: maximum 1.5 m high, with at least 1.5 m between terraces. Up-slope retaining walls: maximum 3.5 m high within 6.5 m of the house. “Terraforce” or “Loffelstein” type blocks are not allowed where visible.
- Boundaries: street – hedge or indigenous planting, optional open fence (charcoal ClearVu or palisade) maximum 1.2 m behind it, or low dry-stone walls up to 1.0 m; side and rear – maximum 1.8 m; Erf 80 and

private open space – visually open fence maximum 1.8 m, planted on the inside, or a low dry-stone wall up to 1.0 m, with no tall solid walls.
- No electrified, razor-wire or barbed-wire fencing on individual erven.
- Pools within the building lines, fenced to SANS 10134 (minimum 1.2 m); interiors grey, natural cement or black; backwash water to the sewer, not onto open space or the street.
- One driveway per erf, maximum 3.5 m wide across the verge [PROPOSED], in block paving or grass-block; two parking bays plus one visitor bay per erf.
- No garden sheds, Wendy houses or retrofitted lapas. Boats, caravans and trailers must be kept in a closed garage.

10.5. Materials and colours

- Walls: plastered masonry painted warm off-white (brilliant white not allowed); local limestone or sandstone in a random, dry-packed look; weathered timber, off-shutter concrete and fibre-cement as accents.
- Roofs: concealed-fix standing seam, Brownbuilt, Diamondek or Victorian profile, or natural or fibre-cement slate, in charcoal, dark grey, mid-grey or stone grey, matt finish only. No bright galvanised or Zincalume. Thatch is not allowed because of the fire risk in a fynbos setting [PROPOSED].
- Joinery: weathered or dark oiled timber, or aluminium powder-coated in matt grey, charcoal, anthracite, bronze or black.
- Paving: exposed aggregate, clay or concrete pavers in earthy tones, or grass-block.

10.6. Services, lighting and plant

- Rainwater tank of at least 5 000 litres per house; stormwater routes shown on the building plans; channels grassed or stone-lined; permeable paving encouraged.
- Solar water heaters with a tank on the roof are not allowed where visible; split systems are allowed. Air-conditioning units at ground level behind a screen wall at least 1.2 m high.
- Lighting: only low-level, shielded, downward-facing fittings (bollards, step lights and shielded wall lights); no floodlights, uplighters or coloured lights; light sources not visible from outside; LED warm white 3 000 K or less.
- Bins, drying yards, gas bottles, pool plant and storage hidden behind walls forming part of the house. House numbers maximum 150 mm, no lit signs.

10.7. Landscaping

- Only plants from the approved palette or the ECO's approved list may be used. Invasive alien species are not allowed. The palette must be revised in accordance with the VIA and botanical specialist (Section 7.5): species not indigenous to South Africa (*Rhaphiolepis indica*, *Westringia fruticosa*) removed, and riverine and forest trees replaced with species suited to the coastal conditions of the Agulhas plain.
- Lawn only within the building lines, maximum 30% of the garden area [PROPOSED], Buffalo or kweek only.
- At least one street tree from the palette per erf frontage; verges planted per the Master Landscape Plan.
- Automatic irrigation with a rain sensor, fed from the rainwater tank where possible. Organic fertilisers and composts only.
- A landscape plan with plant names, sizes and densities must be submitted with the building plans and completed before occupation.
- No private paths or gates from erven into Erf 80. Access to the conservation area is via the estate path system only.

10.8. Fire, fauna and general

- Chimneys and braai flues must have mesh spark arrestors. Fire pits must be well away from natural vegetation and the Erf 80 edge.
- Keep a clear, low-fuel zone of at least 3 m around buildings on erven bordering Erf 80 [PROPOSED].

- Gutters, drains, channels and pump pits must be covered, or have gently sloping sides, so they do not trap small animals.
- Boundary fences next to Erf 80 should leave a 150 mm gap at ground level at intervals for small animals [PROPOSED].

10.9. Plan approval process

All house designs are reviewed by the Design Review Committee (the appointed Estate Architect together with representatives of the HOA) against the written guidelines, in three steps: (1) sketch plan, showing the erf, building lines, storey zone, footprint band, footprint and coverage calculations, all plans, elevations, a site section showing NGL, platforms and the height envelope, materials and colours, and a preliminary landscape and lighting plan; (2) council drawings, endorsed by the Estate Architect before submission to the Cape Agulhas Municipality; and (3) completion inspection of the house and landscaping before the HOA issues its final sign-off. All designs must be prepared by a person registered with SACAP. Renders in the guidelines are conceptual and may not be used to motivate a departure.

10.10. Construction of individual houses

- All building work is governed by this EMPr, which must form part of the building contract.
- Every contractor must sign the estate's Rules for Contractors, covering site boundaries, working hours, deliveries, site toilets, waste, dust, noise and staff conduct.
- The ECO will induct construction staff and may fine contractors who do not comply.
- No work, storage or access outside the construction zone. No dumping on Erf 80 or private open space.
- Topsoil must be stockpiled and reused for rehabilitation. Take care not to damage the municipal water mains in the pipeline servitudes.

11. COMPLIANCE AND MONITORING

11.1. Non-compliance

The Environmental Authorisation is expected to stipulate that non-compliance with a condition of the EA and the EMPr may render the holder liable to criminal prosecution. It is therefore in the interest of the applicant that all contractors comply with this EMPr. Transgressions relate to actions by the contractor whereby damage or harm is inflicted upon the environment or any feature thereof, and where any of the conditions or specifications of the EMPr and EA are not adhered to. The faunal specialist specifies that deliberate killing of indigenous fauna or repeated unauthorised disturbance of the conservation area must be treated as environmental non-compliance. If excessive infringement with regard to any of the specifications is registered, the applicant / project manager / owner reserves the right to terminate the contractor's contract.

Table 9. Penalties scheme (to be reviewed by the ECO if required)

Infringement	Description	Penalty
Encroachment into Erf 80	Entry of vehicles, personnel, materials, stockpiles or waste into Erf 80 or any no-go area	R 10 000 per incident, plus the cost of rehabilitation
Disturbance beyond the approved footprint	Clearing of vegetation or soil disturbance outside the authorised footprint or the construction zone of an erf	R 10 000 per incident, plus the cost of rehabilitation
Killing or removal of fauna	Killing of snakes, tortoises or other fauna, or removal of fauna, plants, rocks or natural material	R 5 000 per incident
Hydrocarbon / fuel spill	Penalty issued when remediation is not implemented timeously	R 5 000

Infringement	Description	Penalty
Damage to municipal infrastructure	Damage to the reservoir supply watermains or unauthorised works in the servitudes	Cost of repair, plus R 5 000
Fossil Finds Procedure	Failure to stop work and report a fossil or archaeological find	R 5 000, plus any penalty under the NHRA
Waste management and dumping	Inappropriate waste management, littering or burning of waste	R 3 000, dependent on extent
Not adhering to conditions of EA	Not attending to specific EA conditions	R 3 000 per condition

11.2. Environmental control sheets

The Environmental Control Sheets in Table 11 must be used by the ECO on a weekly basis to monitor construction activities and ensure compliance with this EMPr. The ECO must familiarise themselves with the EA, this EMPr and the specialist reports before construction starts. The completed sheets form part of the ECO's monthly reports and the completion audit.

11.3. Long-term operational monitoring

The faunal specialist states that retention of Erf 80 will only provide a meaningful conservation outcome if the area is actively managed over the long term. The HOA, or the designated land-management entity, must implement the following monitoring programme and apply adaptive management where monitoring identifies impacts greater than anticipated.

Table 10. Operational monitoring programme

Indicator	Frequency	Responsibility
Alien vegetation condition and follow-up control in Erf 80 and the open spaces	Twice a year (spring and autumn)	HOA / land-management entity
Rehabilitation success of temporarily disturbed areas	Quarterly for the first two years, then annually	HOA
Erosion and stormwater impact at the Erf 80 interface	After heavy rainfall and quarterly	HOA
Encroachment from adjoining residential erven, dumping and unauthorised access	Monthly	HOA
Functionality of fauna passages associated with perimeter fencing	Quarterly	HOA
Faunal mortality associated with roads or fencing	Ongoing record; reviewed quarterly	HOA
Effects of domestic animals	Ongoing record; reviewed quarterly	HOA
Light spill into natural habitat	Annually and on complaint	HOA / Design Review Committee
Fuel load and fire management (implementation of the fire management plan)	Annually, before the fire season	HOA / fire protection association
Compliance of houses with the Architectural Guidelines	Each building and alteration	Design Review Committee

Table 11. Environmental Control Sheets – RECORD OF PERFORMANCE							
TASK	**ACTION REQUIRED / MITIGATION AND METHOD FOR IMPLEMENTATION**	**FREQUENCY**	**TARGET / OUTCOME**	**RESPONSIBILITY**	**DONE YES / NO**	**DATE**	**COMMENT**
PRE-CONSTRUCTION							
Procurement	- The EA, this EMPr and its annexures (Architectural Guidelines, Landscape Plan, Fossil Finds Procedure) and any HWC conditions to be distributed to contractors at tender stage. - Tenderers to price for compliance, including Erf 80 fencing, search and rescue, alien clearing and removal of cut material, faunal inspections and the costs of fossil rescue if required. *METHOD: Distribute with tender documents*	As required	Contractors aware of the requirements and able to budget accordingly	Developer / Project Manager			
Appointments	- Appoint an independent ECO before site works start. - Appoint a standby palaeontologist, a competent snake handler and the Estate Architect. - Record the HWC case number (HWC23083108MS0904) and include HWC's final comment conditions in this EMPr. *METHOD: Written appointments filed in the Environmental File*	Once, before site works	Responsible persons in place before ground disturbance	Developer			
Pre-commencement studies and approvals	- Spring census of *Mimetes saxatilis* and adjustment of the Erf 80 boundary to retain the densest stands where feasible. - Scarce Mountain Copper survey (January to March). - Visual simulations (Viewpoints 1 to 12); verification of double storey zones; final Architectural Guidelines and Landscape Plan ratified by the visual specialist and HWC. - Fire management plan; final fencing design; *METHOD: Specialist reports and approvals filed*	Once, before clearing	Layout and guidelines finalised on the basis of the specialist findings	Developer / specialists			
Securing of Erf 80 and the Master Plan conservation areas	- Zone Erf 80 for nature conservation and register a title deed restriction or equivalent instrument. - Secure the Master Plan conservation areas in accordance with the botanical specialist's five conditions, before or at the same time as the loss of habitat, or implement a separate biodiversity offset. *METHOD: Proof of registration and agreements*	Before clearing	Retained habitat secured in perpetuity	Developer			

Environmental File	- To include the EA, EMPr, BAR specialist reports, HWC correspondence, Fossil Finds Procedure, Architectural Guidelines, Landscape Plan, method statements, registers and ECO reports. - Public complaints register to be kept on site. *METHOD: Issue all documents to the site manager*	Ongoing	Information accessible to the team and the public	ECO / Project Manager			
Environmental induction	- All contractors and workers to attend an induction before starting work; register signed. - Cover Agulhas Limestone Fynbos, Erf 80 as a no-go area, threatened fauna, procedures for animals, prohibition on killing snakes, the Fossil Finds Procedure and the watermains in the servitudes. *METHOD: Briefing by the ECO*	Before work and for each new worker	All personnel aware of their obligations	ECO / Contractor			
Method statements	- Contractors to submit method statements for clearing, earthworks, trenching, services in the servitudes, stormwater, batching, waste and emergency response. *METHOD: ECO review and approval*	Before each activity	Environmentally sound methods approved	Contractor / ECO			
Site demarcation	- Survey and demarcate the Erf 80 boundary and fence it off for the duration of construction. - Demarcate the construction footprint, the pipeline servitudes, the private open space and the construction zone of each erf (5 m street side, 3 m other sides). - Erect no-go signage. *METHOD: Survey pegs, fencing and signage; ECO inspection*	Before clearing; maintained weekly	No encroachment into Erf 80 or no-go areas	Contractor / ECO			
Search and rescue and seed collection	- Search and rescue of geophytes, succulents and other transplantable species by a suitably qualified person before clearing, for landscaping or relocation to Erf 80 or RE/281. - Collect seed of *M. saxatilis* and other Proteaceae for propagation by a specialist nursery. *METHOD: Record of species and numbers rescued*	Before clearing of each phase	Rescued plant material and seed retained	Developer / ECO			
Alien clearing before construction	- Implement a vigorous alien invasive clearing programme on the whole erf before construction. - Remove all cut alien material and woodcutters' debris from site; do not leave it in situ. - Clear dense stands progressively and target herbicides to avoid indigenous vegetation. *METHOD: Clearing plan and photographic record*	Before construction	Site free of alien stands and cut debris	Developer / Contractor			

Contractor's camp	- Locate the camp, laydown, batching and parking within the development footprint, outside Erf 80, the open space and the servitudes, as approved by the ECO. - Provide toilets, waste receptacles, spill kits and firefighting equipment. *METHOD: ECO approval of layout*	Before establishment	Camp in a transformed area with no impact on retained habitat	Contractor / ECO			
Communication and complaints	- Notify adjoining residents of the construction programme and abnormal deliveries; keep complaints register and respond to complaints. *METHOD: Notices and register*	Ongoing	Neighbours informed; complaints resolved	Project Manager / ECO			
Emergencies and fire	- Appoint a Fire Officer; display emergency, snake handler and HWC contacts; no open fires; spark-producing work only with a fire watch. *METHOD: Emergency procedure and contact list displayed*	Before work; ongoing	Emergencies managed without environmental harm	Contractor			
CONSTRUCTION							
Pre-construction faunal inspection	- Inspect immediately before vegetation clearing in each portion of the footprint, concentrating on rock slabs, loose rocks, dense shrubs, woody debris and sandy soil. - Allow animals to move away; move slow-moving fauna a short distance into adjoining habitat where legally permitted. - Stop work for a Southern Adder or other reptile until it has moved or been removed by a competent person; snakes may not be killed. - Stop work and contact the faunal specialist if an unconfirmed SCC is found. *METHOD: Inspection record in the Fauna Register*	Immediately before each clearing	No avoidable mortality of fauna	ECO / faunal specialist / Contractor			
Vegetation clearing	- Clear strictly within the authorised Alternative 2 footprint, progressively and not substantially ahead of construction, towards retained natural habitat. - Check for active nests; maintain an exclusion area around active nests until breeding is complete; avoid the active breeding season. - Do not disturb vegetation, rock slabs, refugia or soil outside the footprint for construction convenience. *METHOD: ECO inspection and photographs*	Daily during clearing	No clearing outside the footprint; no nests destroyed	Contractor / ECO			
Topsoil	- Strip topsoil before excavation, stockpile separately (maximum 1.5 m high) and reuse on road verges and open space to retain the soil seed bank. *METHOD: ECO inspection*	During earthworks	Topsoil and seed bank retained for rehabilitation	Contractor			

Earthworks, trenches and excavations	- Close or backfill excavations as soon as practicable; provide escape ramps where left open overnight. - Inspect open excavations each morning and before backfilling; remove trapped animals; cap or inspect pipes. - Pause work where subterranean fauna (golden moles) are encountered. *METHOD: Daily inspection record*	Daily	No entrapment mortality	Contractor / ECO			
Palaeontological and archaeological finds	- Implement the Fossil Finds Procedure: designate responsible persons; workers watch for fossils; stop work at a find; protect and safeguard material; ECO informs HWC and the standby palaeontologist with date, GPS, depth, description and scaled photographs. - Archaeological material or human remains: stop work, secure and report to HWC; no disturbance without a permit (NHRA s35 and s36). *METHOD: Fossil Finds Register*	During all excavations	Fossils and archaeological material rescued and recorded	Contractor / ECO / palaeontologist			
Protection of Erf 80	- Keep Erf 80 free of camps, laydown, spoil, stockpiles, concrete mixing, parking, waste storage and access routes. - No services through Erf 80; no removal of rocks or plants from Erf 80. *METHOD: Weekly ECO inspection and photographs*	Weekly	Erf 80 undisturbed	Contractor / ECO			
Municipal watermains and civil services	- Survey and peg the servitudes; no excavation, stockpiling or heavy vehicle crossing except at approved points; no connections to the reservoir supply mains. - Install services in shared trenches under or behind the road, connecting to the 160 mm Ø watermain and sewer at Adelle Street. *METHOD: Civil engineer's supervision*	During civil works	No damage to the municipal mains	Contractor / civil engineer			
Stormwater and erosion	- Install temporary stormwater controls before earthworks; prevent runoff into Erf 80. - Construct attenuation, silt and debris traps as designed; repair erosion promptly. *METHOD: ECO inspection after rain*	Weekly and after heavy rain	No erosion or sedimentation	Contractor / ECO			
Materials, stockpiles and wastewater	- Store materials and stockpiles in approved areas within the footprint. - Contain cement wash-water in lined areas; no discharge onto soil or vegetation. *METHOD: ECO inspection*	Weekly	No pollution of soil or habitat	Contractor			

Waste management	- Use labelled, scavenger-proof receptacles; remove waste regularly to a licensed facility; no burning or burial; no dumping in Erf 80; daily litter patrols. *METHOD: Disposal certificates*	Weekly	Clean site; no dumping	Contractor			
Fuels, hazardous substances and equipment	- Store fuels in bunded areas (110%) away from retained habitat; drip trays; spill kits; repair leaks; clean spills immediately. *METHOD: ECO inspection*	Weekly	No spills or contamination	Contractor			
Dust and noise	- Damp down with non-potable water; cover loads and fine stockpiles; low speeds; working hours 07:00–17:00 on weekdays and 08:00–13:00 on Saturdays. *METHOD: ECO inspection and complaints register*	Daily	No dust or noise nuisance to neighbours	Contractor			
Construction traffic	- Deliveries in working hours and outside peak holiday periods; route via Main Road and Adelle Street; flag personnel at the access; clean and repair Adelle Street; vehicles on approved routes only. *METHOD: ECO inspection and complaints register*	Ongoing	Safe access; no damage to public roads	Contractor			
Visual (construction)	- Limit clearance to the construction zone of each erf; keep the site tidy; screen the camp; shield and limit night lighting. *METHOD: ECO inspection*	Weekly	Construction visual impact limited	Contractor			
House construction	- Each house approved by the Design Review Committee before construction; ECO marks out the construction zone; builder signs the Rules for Contractors. *METHOD: DRC approval letter and ECO record*	Each erf	Houses comply with the guidelines and EMPr	Owner / builder / ECO			
Argentine ant	- Inspect imported soil, plants and building material for the Argentine ant. *METHOD: ECO inspection*	On delivery	No introduction of Argentine ant	Contractor / ECO			
Site clean-up and rehabilitation	- Remove all temporary structures and waste; loosen compacted soil; reshape and rehabilitate with locally indigenous Agulhas Limestone Fynbos species; no invasive species. - Monitor and treat rehabilitated areas. *METHOD: ECO close-out inspection*	At completion of each phase	Disturbed areas rehabilitated	Contractor / ECO			
POST-CONSTRUCTION (OPERATIONAL) PHASE							

Management of Erf 80	- Manage Erf 80 primarily for the conservation of natural Agulhas Limestone Fynbos and faunal habitat, coordinated with the Paapekuilsfontein conservation area. - No private encroachment, gardens, structures, tracks or recreational facilities; no conversion to a landscaped park; no off-road driving; no removal of rocks, plants or natural material. *METHOD: HOA management plan and records*	Ongoing	Erf 80 functional and connected	HOA			
Alien clearing	- Systematic follow-up clearing in Erf 80 and the open spaces; control garden escapes; post-fire control of *Acacia*. *METHOD: Clearing records and photographs*	Twice a year	Erf 80 free of invasive aliens	HOA			
Fire management	- Implement the fire management plan; firebreaks on the developed edge; ecological burning of Erf 80 with RE/281 where appropriate; no burning by residents. *METHOD: Fire management plan records*	Annually	Appropriate fire regime; reduced fire risk to homes	HOA / fire protection association			
Fencing and fauna passages	- Security perimeter encloses the residential component. Only permeable fencing on Erf 80 connected to adjoining habitat; fauna passages kept functional; no solid walls on conservation interfaces; electrification safe for fauna. *METHOD: Inspection*	Quarterly	Landscape permeability maintained	HOA			
Roads	- Maximum 30 km/h on roads adjoining Erf 80; traffic calming where required; awareness of tortoises and snakes on roads. *METHOD: Signage and inspection*	Ongoing	No road mortality of fauna	HOA			
Lighting	- Low-level, shielded, downward, warm-spectrum lighting; none on the Erf 80 edge; no floodlighting; motion activation where possible. *METHOD: Inspection and complaints*	Annually	No light spill into Erf 80	HOA / DRC			
Domestic animals and pest control	- No free-ranging dogs in Erf 80; dogs leashed near the conservation area; cats prohibited or tightly controlled; integrated pest management; no second-generation anticoagulant rodenticides; no broad-spectrum pesticides in Erf 80. *METHOD: Estate rules and records*	Ongoing	No predation or poisoning of fauna	HOA / residents			
Landscaping and gardens	- Locally indigenous species only from the approved palette; no invasive plants; no dumping of garden refuse in Erf 80; manage irrigation and fertiliser near Erf 80. *METHOD: DRC completion inspection*	Each erf and ongoing	Gardens support the ecological objectives	HOA / owners			

Design guidelines and built form	- Design Review Committee to review all houses, additions and alterations against the Architectural Guidelines. *METHOD: DRC records*	Each submission	Built form consistent with the guidelines	HOA / DRC			
Stormwater and water use	- Maintain attenuation, silt and debris traps; rainwater tanks and water-wise fittings in all houses. *METHOD: Inspection*	Annually and after heavy rain	No erosion; reduced water demand	HOA			
Monitoring and adaptive management	- Implement the operational monitoring programme (Table 10) and adapt management where impacts exceed those anticipated. *METHOD: Annual monitoring report*	Annually	Long-term conservation outcome achieved	HOA / land-management entity			

12. DECOMMISSIONING PHASE

Not applicable. The residential development is permanent.

13. ENVIRONMENTAL AUDITS

The purpose of auditing is to determine and monitor compliance with the EMPr and EA and to measure its effectiveness in mitigating environmental impacts. In terms of Regulation 34 of the NEMA EIA Regulations, 2014, the holder of the EA must conduct environmental audits and submit environmental audit reports to the competent authority at the intervals indicated in the EA.

The objective of the environmental audit report is to:

- Report on the level of compliance with the conditions of the EA and the EMPr.
- Report on the extent to which the avoidance, management and mitigation measures outlined in the EMPr achieve its objectives and outcomes.
- Identify and assess any new impacts and risks as a result of the activity.
- Evaluate the effectiveness of the EMPr, identify shortcomings, and identify the need for any changes to the avoidance, management and mitigation measures.

An environmental audit report must contain the details and expertise of the independent auditor, a declaration of independence, the scope and methodology of the audit, an indication of the ability of the EMPr to provide for the avoidance, management and mitigation of impacts, any assumptions, uncertainties or gaps in knowledge, a description and summary of any consultation undertaken, and any other information requested by the competent authority.

14. CONCLUSION

This EMPr has been developed as part of the Basic Assessment process to ensure that the mitigation and management measures recommended by the specialists are enforced during the pre-construction, construction and operational phases of the Bella Vista development on Erf 3495, Struisbaai, and that the conditions of the EA are upheld. The site supports Critically Endangered Agulhas Limestone Fynbos within a CBA1, and the success of the development in environmental terms depends on the strict protection and long-term active management of Erf 80, the securing of the landscape-scale conservation areas, and the consistent application of the architectural, landscape and estate management controls. The EMPr must guide all contractors, owners and the HOA, and must be updated as the EA conditions, the HWC comment and the outstanding studies are finalised.

15. DECLARATION OF CONTRACTOR'S ACCEPTANCE

I, _____ (name), representing _____ (company name), have read and understood the above Environmental Management Programme and hereby acknowledge its contents and agree to abide by its specifications and any amendments thereto.

Signed: _____ Date: _____