



Kraaibosch Environmental Management Plan (KEMP)

1. Introduction

The Kraaibosch Country Estate and Manor Home Owners Association has resolved to submit a revised OEMP for the Estate to the Department of Environmental Affairs and Planning (the DEADP). The process leading up to the formal submission of the revised OEMP will be a fairly lengthy one and one which is not under HOA control.

Until the revised OEMP is approved by the Department, this Environmental Management Plan will define the environmental obligations of the HOA. It is based on the draft OEMP which the Governance Committee has provisionally approved and defines the HOA's obligations in respect of environmental matters.

The objectives are to address all relevant environmental considerations during the long-term operation of the Estate.

These include, but are not limited to:

- Sustainable long-term alien vegetation management.
- Oversight and control of building and renovation activities on individual erven.
- Effective natural and recreational open space management.
- Rehabilitation of the river system within the Estate boundaries.
- Implementation and continuation of long-term environmental monitoring programs.
- Stormwater management and erosion control.
- Waste management and pollution prevention.
- Management of littering, illegal dumping, household, garden, and other waste within the estate.
- Biodiversity conservation and habitat enhancement.
- Environmental education and awareness.
- A Maintenance Management Plan

2. Using the KEMP

All members, contractors, employees and tenants and the Management team of the HOA must adhere to this KEMP, as mandated by the HOA constitution. The KEMP must be taken into consideration for all operational, renovation and maintenance activities on the Estate. The KEMP contains rules and regulations that must be adhered to, as well as recommendations and guidelines that should be adhered to.

3. Relevant Directives in the ROD

The Environmental Authorisation (the EA) issued by the DEADP contains the conditions that relate to the OEMP on which this KEMP is based:

Clause 5.6: The OEMP must address storm water management during construction and after construction.

Clause 6: The Applicant must compile and submit an acceptable operational phase Environmental Management Plan ("OEMP") for the entire property. This Directorate must approve this document before any of the units may be occupied.

Clause 6.1 : The OEMP must incorporate the conditions of authorisation given in this Record of Decision, as appropriate to the operational phase of the project. The Home Owners Association/ or operator of the facility must implement and ensure compliance with this KEMP.

Clause 6.2: The OEMP must make provision for regular environmental audits and strict control by the Home Owners Association must form part of the operational phase OEMP for this development.

Clause 6.3: Address the protection of the 1:4 slopes, maintenance of the wetlands and river, in accordance with the Guidelines for River Maintenance, compiled by CapeNature, the potential for the soil erosion, the establishment of indigenous vegetation and complete eradication of all alien invasive vegetation.

Clause 8: An integrated waste management approach must be used, based on waste minimisation and incorporating reduction, recycling, re-use and disposal where appropriate. Any solid waste shall be disposed of at a landfill licensed in terms of section 20 of the Environmental Conservation Act, 1989 (Act No. 73 of 1989)

Clause 11: A buffer of at least 40 meters from the edge of rivers, streams and wetlands on the site must be provided for and maintained for the functioning of ecological processes. If necessary, the layout plan must be adapted to make provision for said buffer, except in instances where roads or service infrastructure will cross such wetlands.

Clause 13: No permanent building structures may be developed on areas where slopes are steeper than 1:4.

Clause 18: The Applicant shall be responsible for ensuring compliance with the conditions contained in the Record of Decision by any person acting on his behalf, including but not limited to an agent, servant, employee or any person rendering a service to the applicant in

respect of the activity, including but not limited to contractors and consultants.

Clause 20: Departmental officials shall be given access to the Estate for the purpose of assessing and/or monitoring compliance with the conditions contained in this Record of Decision, at all reasonable times.

4. Environmental Management Committee

The Trustees of the HOA shall arrange the appointment of an Environmental Management Team (EMT) to oversee the implementation of this KEMP and to fulfil the HOA's ongoing environmental obligations.

The terms of reference of this committee will be the following:

4.1. Composition

The EMT shall consist of the following members:

- A qualified environmental assessment professional as needed.
- The Estate Manager or his designated nominee
- The Enviro Trustee or in his or her absence, the Trustee nominated by the Trustees.
- Such number of HOA Members as the Trustees may decide, but at least two.
- A co-opted specialist/s as required for specific tasks (e.g., freshwater ecologist, botanist, environmental assessment professional). Such specialist may be an ad hoc appointment and not full-time.

4.2. Roles and Responsibilities

The KEMT shall be responsible for:

- 1) Overseeing the implementation and compliance of the KEMP.
- 2) Monitoring environmental management practices within the Estate.
- 3) Aligning all environmental activities (Estate Garden Plan) on the Estates with the KEMP objectives and principles .
- 4) Promoting, encouraging and overseeing initiatives of reforestation, rewilding, nature and water conservation, erosion control, restoration and enhancement of natural habitat, and ensuring that beautification projects are aligned with the Estate Garden and zoning plan.
- 5) Reviewing and recommending project proposals and budgets submitted by the Management to the BOT.
- 6) Advising the HOA Trustees and its committees on environmental matters relevant to the Estate.
- 7) Facilitating ongoing environmental awareness and training for staff and residents as appropriate, and engaging residents through structured feedback.
- 8) Reviewing and recommending minor amendments to operational activities which do not trigger listed activities.
- 9) Plans for environmental and related projects on the Estate as identified by Members or the BOT or by KEMT, will be designed and compiled by a project team. The leader of such project team will be appointed by the BOT after submission to the BOT of a proposed or required project by Members or by the KEMT. Team members as required will be appointed by the team leader who will assume responsibility for producing the relevant plan according to the BOT instructions and submitting same via the KEMT to the BOT.

- 10) Conducting annual audits of environmental conditions.
- 11) Coordinating communication with relevant external authorities (e.g., DEADP, local authority) as required.
- 12) Ensuring compliance with all applicable environmental legislation, approvals, and license conditions relevant to the operational phase.
- 13) Initiating and overseeing environmental monitoring reports as may be required by the DEADP.
- 14) Ensuring that new estate developments adjacent to the Kraaibosch Country Estate and Manor are compliant with and remain compliant with all authorisations and legal requirements. To enable this brief, the committee must engage the services of an Environmental Practitioner and obtain approval from the BOT for the remuneration of the Practitioner. The EMT must keep the HOA Trustees fully informed of the state of its activities and investigations in this regard and may not, without prior approval from the HOA Trustees, commit the HOA to take action or to refrain from action.
- 15) Report at least quarterly to the HOA Trustees on progress, risks and key developments.

4.3. Meetings

The EMT shall meet monthly, or more frequently if significant environmental issues arise.

4.4. Reporting

The EMT shall submit the following reports to the HOA Trustees, with recommendations for budgeting and action planning. The reports will summarize the estate's environmental performance and identify any corrective actions needed and will be made available to DEAP on request.

- A quarterly environmental monitoring report
- An annual inspection and condition assessment report of all recreational and natural open spaces

4.5 Term

The EMT shall remain in place for the duration of the KEMP, or until such time as the Trustees, in consultation with relevant authorities, determine that an alternative environmental oversight mechanism is more appropriate.

5. Effective Recreational Open Space Management

This includes the proactive planning, maintenance, and improvement of areas within the estate intended for recreational use to ensure they remain safe, functional, and attractive for residents and visitors. Activities shall include, but are not limited to:

- Regular mowing and care of lawns to maintain an aesthetically pleasing and usable surface.
- Management of swales and associated vegetation to promote proper drainage and prevent flooding.
- Routine inspection and maintenance of footpaths to ensure user safety and accessibility.

- Maintenance of water pipes and fire hydrants.
- Clearing and unblocking of stormwater pipes and associated infrastructure to maintain effective water flow.
- Removal of litter and waste from all recreational spaces to protect both the environment and community health.
- Systematic identification and removal of alien and invasive plants.
- Inspection, repair, and vegetation clearing around boundary and internal fencing (2m buffer) to maintain security and prevent damage.
- Pruning and trimming of trees and shrubs to promote healthy growth, reduce fire risk, and maintain clear sightlines.
- Installation, upkeep, and replacement of recreational equipment and garden furniture as appropriate.
- Ensuring that signage, bins, lighting, and other supporting infrastructure are maintained in good condition.
- Promoting member education and awareness regarding appropriate recreational space use and community responsibilities.

6. Effective Natural Open Space Management

This encompasses the protection, restoration, and sustainable management of natural open spaces to preserve ecological integrity, enhance biodiversity, and maintain ecosystem services. Activities shall include, but are not limited to:

- Stormwater management measures that protect natural hydrology, reduce flood risk, and support aquifer recharge.
- Maintaining a clear 2m buffer between vegetation and the Estate security fence (perimeter and Modderrug River sections).
- Rewilding initiatives to reintroduce indigenous plant species and encourage natural processes to restore ecological balance.
- Systematic alien invasive species removal, with ongoing monitoring and follow-up clearing.
- Erosion prevention and management through appropriate planting and sustainable Urban Drainage Systems (SuDS) principle
- Management of runoff to reduce siltation, pollution, and habitat disturbance in adjacent watercourses or wetlands.
- Habitat enhancement projects, such as planting indigenous vegetation and creating pollinator gardens.
- Monitoring and maintaining remaining natural buffer zones, including riparian areas, to safeguard sensitive ecosystems.
- Implementation of fire management practices where relevant, in line with ecological requirements and emergency preparedness.
- Community involvement and environmental awareness programs to foster stewardship of natural areas.
- Adaptive management to ensure continuous improvement in conserving the natural open space.

7. Protection of the River Corridor

- The River corridor is subject to stricter conservation measures in comparison to other open space areas. It incorporates the river bank and associated riparian vegetation and runs up to the individual property erf boundaries across recreational and natural open spaces. The river corridor forms the core of the natural open space area and must be properly maintained.
- No earthworks or structures are allowed within the buffer area other than a footpath, the security fence and other necessary roads and service infrastructure.
- The riparian vegetation and river course is to be left to recover naturally and must not be “gardened” in any way. Intervention may only take place if rehabilitation appears to have failed. Mowing takes place in the river corridor in both the recreational and natural open space areas.
- The EMT shall conduct quarterly inspections of the river corridor to monitor recovery, identify any signs of invasive species reinvasion, erosion, storm water and recommend remedial measures if needed.

8. Fire Management

The HOA shall implement proactive measures to support ecosystem processes while reducing wildfire risk and ensuring compliance with applicable legislation. Activities shall include, but are not limited to:

- Implementing controlled or prescribed ecological burns under the guidance of suitably qualified professionals, subject legal permits and relevant authorities.
- Maintaining defensible buffer zones and fire breaks in accordance with local legislation and best practice guidelines, ensuring these remain accessible and free of obstructions to support emergency response.
- Ensuring adequate firefighting resources, are available, maintained in working order, and that staff are trained in their safe use.
- Carrying out regular resident awareness programs and fire drills to promote fire preparedness, including familiarisation with evacuation routes and emergency procedures.
- Keeping detailed records of all fire-related activities, including prescribed burns, fuel reduction work, and training, and reviewing fire management practices at intervals of three to five years or after any significant fire event.

9. Walking Trail

A walking trail was historically identified along the river corridor forming part of the northern boundary of the Estate. Following the installation of a security fence in 2018, certain sections of the original proposed trail are now located outside or between the fence and the river, making continued use impractical.

The HOA is considering formalising an internal walking path, making use of existing footpaths and open space areas, within the fenced area for use primarily by residents. However, no decision has been taken in this regard at present. Considerations include legal responsibilities associated with maintaining such a facility and the need to manage safety and legal liability. Should the HOA resolve to proceed with developing an internal walking path in future, it will do so in compliance with applicable legal, environmental, and safety requirements.

10. Alien plant control

Initial invasive alien plant clearing was carried out during the construction phase of the Estate. However, continuous follow-up is required throughout the operational life of the Estate to prevent re-infestation. This is implemented through the Invasive Alien Plant Control Plan in terms of the National Environmental Management: Biodiversity Act (Act No. 10 of 2004, amended 2014). The Plan specifies target species and preferred eradication methods.

11. Animal Control

In recognition of the estate's rich biodiversity, including species such as snakes, geckos, mongoose, porcupines, rooikats, and ground-nesting or foraging birds (e.g., flufftails, curlews, and larks), all residents and estate members are required to observe the following:

- **Respect and Caution:** Members shall exercise vigilance when encountering any wild animal or bird, particularly those on paths, gardens, or common areas.
- **Non-Interference:** No action may be taken that causes harm, distress, or unnecessary disturbance to wildlife. This includes physical interference, feeding, or loud activity in known nesting or habitat zones.
- **Snake Encounters:** In the event of a snake sighting, members must maintain a safe distance and immediately notify the Estate Management team. No attempts should be made to handle, kill or relocate the animal.
- **Reporting and Guidance:** Where uncertainty exists regarding the identification or handling of a wildlife encounter, members shall contact the Estate Management team for appropriate guidance.
- **Habitat Awareness:** Members are urged to remain cognizant of the presence of low-nesting birds and foraging mammals, especially during breeding or migratory seasons, and to avoid trampling or disrupting natural ground cover.

11. Monitoring of storm water outlets

The Storm water outlets have been designed in such a way that they will dissipate the speed of the water flow as well as trap litter and silt before it enters the open space or streams.

All storm water outlets should be inspected after each significant rain event or at least monthly and cleaned where necessary. The estate landscaping team clears litter as part of their duties and records are kept of litter cleared.

12. Staff Training and Capacity Building

All staff shall receive an environmental induction on commencement of duties, covering key KEMP principles, legal requirements, and their roles in maintaining compliance. Quarterly toolbox talks, led by the Gardening Manager, Operations Manager or the EMT, shall address relevant topics such as:

- alien and invasive species identification and removal
- correct use and maintenance of tools
- safe handling and disposal of herbicides and garden waste
- awareness of sensitive areas and buffer zones
- proper mowing practices adjacent to the river corridor to ensure rehabilitation.
- Fire safety and fire wise.
- First aid.

On-the-job mentorship will be encouraged, pairing experienced staff with newer workers to build practical skills in ecological gardening, planting, pruning, and site restoration.

Where possible, key staff members (for example, the Gardening Manager and the Operations Manager) should attend external workshops or training sessions on alien invasive species control, wetland management, or relevant biodiversity conservation topics to keep abreast of best practices.

The Estate Management shall continually assess the effectiveness of training initiatives and monitoring processes and make improvements as needed to ensure the long-term success of the KEMP.

13. Review, Reporting, and Amendment

13.1 Monitoring and Reporting

The HOA shall ensure that monitoring of environmental performance takes place on an ongoing basis through the Environmental Management Team (EMT). An annual environmental compliance report shall be prepared by the EMT and submitted to the Trustees, which will:

- Summarise the implementation of KEMP measures
- Identify any non-compliance events and corrective actions taken
- Recommend improvements or adjustments for the following year
- Be made available to DEADP and other relevant authorities upon request.

- Quarterly Environmental Monitoring Reports will be drafted by the EMT and submitted to the HOA and made available to DEADP on request.

13.2 Incident and Complaints Handling

The HOA shall maintain a register of environmental incidents (such as sewer spills, pollution events, or significant non-compliance) as well as complaints raised by residents or authorities. Incidents shall be investigated by the EMT, and where necessary, reported to relevant authorities. Corrective actions shall be documented and tracked until resolved.

13.3 Record keeping

The HOA shall retain all records relevant to environmental management, monitoring, complaints, and incidents for a minimum of five years, or longer if required by law. These records shall be available for inspection by DEADP or other competent authorities on reasonable notice.