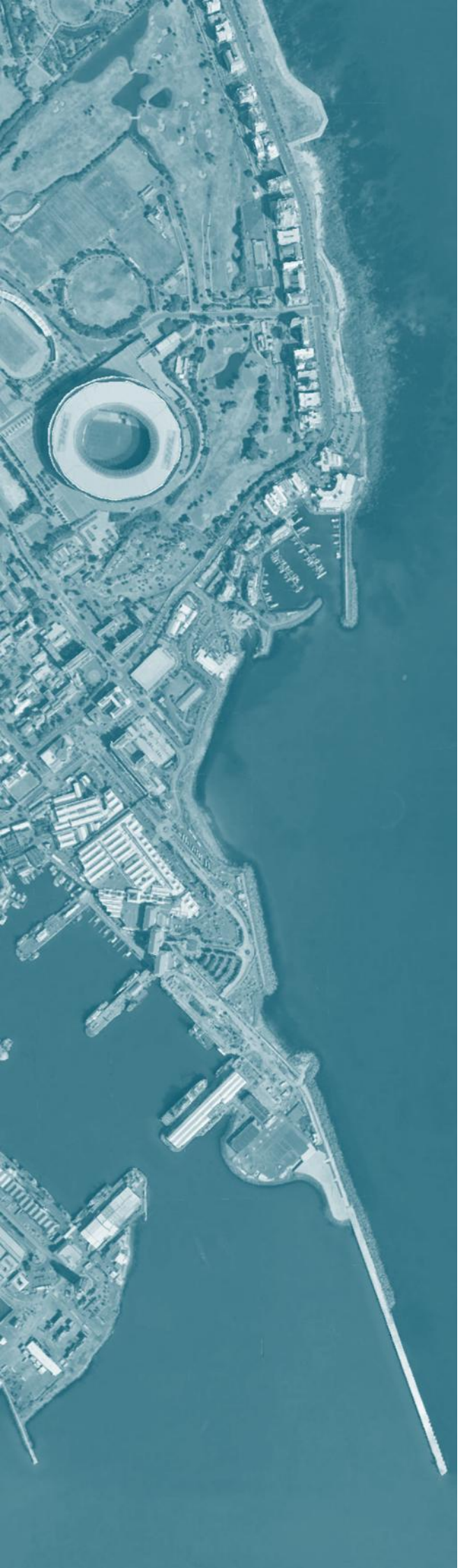

# Final Scoping Report

## Proposed Development of the Granger Bay Precinct and Reclamation of Land at the V&A Waterfront in Cape Town, Western Cape

**DEA&DP Ref: 16/3/3/2/A7/4/3051/25**

**VERSION:** FINAL
**DATE:** 15 JANUARY 2026

**PREPARED FOR**
V&A Waterfront Holdings Pty (Ltd)

**PREPARED BY**

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# DOCUMENT DETAILS

## PROPOSED DEVELOPMENT OF THE GRANGER BAY PRECINCT AND RECLAMATION OF LAND AT THE V&A WATERFRONT: FINAL SCOPING REPORT

### APPLICANT

**V&A Waterfront Holdings Pty (Ltd)**
PO Box 50001, Cape Town, 8001

### ENVIRONMENTAL ASSESSMENT PRACTITIONER

**Infinity Environmental (Pty) Ltd.**

Collingwood Building
Black River Park, 2 Fir Street
Observatory, Cape Town

**Contact**
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### Report purpose

This Scoping Report is prepared in accordance with the EIA Regulations, 2014 (as amended). The purpose of the Scoping Report is to:

- Describe the proposed project, including a sufficient level of detail to enable stakeholders to identify relevant issues and concerns;
- Describe the receiving environment and development context within which the project is proposed, to assist in identifying issues and concerns;
- Provide an overview of the process to be followed during the EIA, specifically the Public Participation Process; and
- Respond to comments submitted during the Scoping Process public participation.

### Authors

J Rose B.Sc. Hons (Reg. E.A.P. #2019/1116, Pr.Sci.Nat #120148)
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### Internal Review

T Solomon B.Sc. (Reg. E.A.P. #2019/1671)

### VERSION HISTORY

| Date | Version |
|---|---|
| 31 July 2025 | Pre-application Draft Scoping Report |
| 10 November 2025 | Draft Scoping Report |
| 15 January 2025 | Final Scoping Report |

**Title:** Proposed Development of the Granger Bay Precinct and Reclamation of Land at the V&A Waterfront: Final Scoping Report

**Report status:** Final

### DECLARATION OF EAP'S INDEPENDENCE

I, Jeremy Rose, appointed by V&A Waterfront Holdings Pty (Ltd) as Environmental Assessment Practitioner for the proposed expansion of the Granger Bay Precinct at the V&A Waterfront, hereby declare that the information provided in this report and supporting documentation is complete and correct to the best of my knowledge; that other than fair remuneration for work performed in terms of this application I have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; that I have disclosed, to the Applicant, the specialist(s), the Competent Authority and registered interested and affected parties all material information that have or may have the potential to influence the decision of the Competent Authority; that I have ensured that information in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments; and that I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.

**Jeremy Themba Rose** BSc Hons, Reg. E.A.P. 2019/1116, Pr.Sci.Nat 120148
Infinity Environmental (Pty) Ltd: Director & Principal EAP
12 years' experience in environmental management (CV in Appendix A)

# EXECUTIVE SUMMARY

## Background

V&A Waterfront Holdings (Pty) Ltd. proposes to develop the Granger Bay Precinct of the Victoria & Alfred Waterfront for a new mixed-use residential and commercial development, west of Beach Road and north of Granger Bay Boulevard in Cape Town. The proposal includes the reclamation of land from the sea, protected by new coastal defence structures, including two new breakwaters forming a sheltered bay. The proposal would provide for public access along this section of shoreline west of the V&A Waterfront, extending the existing public promenade.


**Figure E1: Locality map of the site and proposed land reclamation area.**

## Legislative requirements

Due to the nature and location of the proposed development, an environmental authorisation (EA) is required in terms of the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA). Section 24 of NEMA provides for the listing of activities that may have a negative environmental impact and which require EA prior to commencement. Three Environmental Impact Assessment (EIA) Listing Notices were published in 2014 (GN R. 983 to 985, as amended) to identify these activities and specify the type of assessment process required. Since activities from Listing Notice 2 are proposed, this application will follow a **Scoping and EIA process** in terms of the 2014 EIA Regulations, as amended. The competent authority for the Scoping and EIA process is the provincial authority, the **Western Cape Department of Environmental Affairs and Development Planning (DEA&DP).**

**Listed Activities applicable to the proposed development:**

- Listing Notice 1 (GN 327 of 2017): Activity 9, 15, 17 and 19A
- Listing Notice 2 (GN 325 of 2017): Activity 14, 23 and 26

Confirmation was requested by the DEA&DP on the relevant listed activities for the proposed development relating to internal infrastructure. It was determined that Activity 9 of Listing Notice 1 is applicable to the proposed stormwater infrastructure, and this listed activity has been included in the application for environmental authorisation. More details on the infrastructure upgrades required and applicable listed activities are available in Chapter 4 and Chapter 2, respectively.

The proposed development will also require ministerial and parliamentary approval for the reclamation of land in terms of the Integrated Coastal Management Act (Act 24 of 2008) to accommodate new coastal public amenities and coastal protection infrastructure. An application for pre-approval of land reclamation has been made to the national Minister of Forestry, Fisheries and the Environment, and the consideration of this application will run in parallel with the Scoping Process. More details of the integration of these two processes can be found in Chapters 1 and 6 of the final Scoping Report.

## Purpose of this report

This Final Scoping Report (FSR) forms part of the Scoping and Environmental Impact Assessment process in terms of the NEMA and the EIA Regulations. It identifies the environmental issues and impacts that will be further assessed in the EIA process, and sets out a plan for the studies, assessments, and participation processes that will be undertaken. The FSR is informed by comments and queries received during public participation on the draft Scoping Report (DSR), which was made available for two 30-day review and comment periods in 2025. Written submissions received during the most recent comment period (10 November to 10 December 2025) are recorded and responded to in a Comments and Responses Report (**Appendix H2**). All significant changes to the draft report are **underlined** in this FSR. The FSR has been submitted to the competent authority for approval before the EIA process is started, and is shared with interested and affected parties for information purposes.

## Project Proposal

### Proposed reclamation of land and new coastal protection structures

The proposed development involves the reclamation of approximately 3.2 hectares of land from Table Bay to accommodate new coastal public amenities and new mixed-use development. This reclamation will be protected by a new permanent rock revetment and two ('east' and 'west') breakwaters forming a new protected bay approximately three hectares in extent. The west breakwater will extend approximately 90 metres into Table Bay, and the east breakwater approximately 140 metres. A revetment along the new shoreline connecting the two breakwaters will be approximately 540 metres long. New public amenities will include the new bay, providing sheltered waters for boating, kayaking, and swimming. Land-based amenities will include a coastal public walkway, a slipway, a fixed quayside, a landscaped promenade, tidal pools, pedestrian paths and open areas. The proposed revetment and breakwater will be constructed in phases over approximately 3 years. More detail on the redevelopment of the existing slipway is provided in Chapter 4.

### Mixed-use development

New mixed-use development is proposed on the portion of the site currently located within 100m of the highwater mark, which will accommodate residential, hotel, leisure, and commercial uses, with residential accommodation options such as hotels, serviced apartments, and private apartments. The orientation and massing of buildings will respond to the coastal setting and maximise outward views of the ocean. Approximately 78 000 $m^2$ of bulk will be allocated from the existing development rights permitted within the V&A Waterfront. Development rights are already in place for a portion of the Granger Bay precinct not included in this Scoping and EIA.

### Public space

New public amenities will include the new bay, providing sheltered waters for boating, kayaking, and swimming. Land-based amenities will include a coastal public walkway, a slipway, a fixed quayside, a landscaped promenade, tidal pools, pedestrian paths, and open areas. This will be accessible to the public in the same way that the other public areas in the Waterfront are open to the public.

### Transport and services

The Granger Bay development will be supported by various transport modes, including MyCiTi, Park & Ride, and micro-mobility services, with enhanced integration between these modes. No major access road or external road network upgrades are required to support the proposed development. Wastewater management, potable water supply, solid waste removal and disposal, and electricity supply will be accommodated within the existing infrastructure capacity.

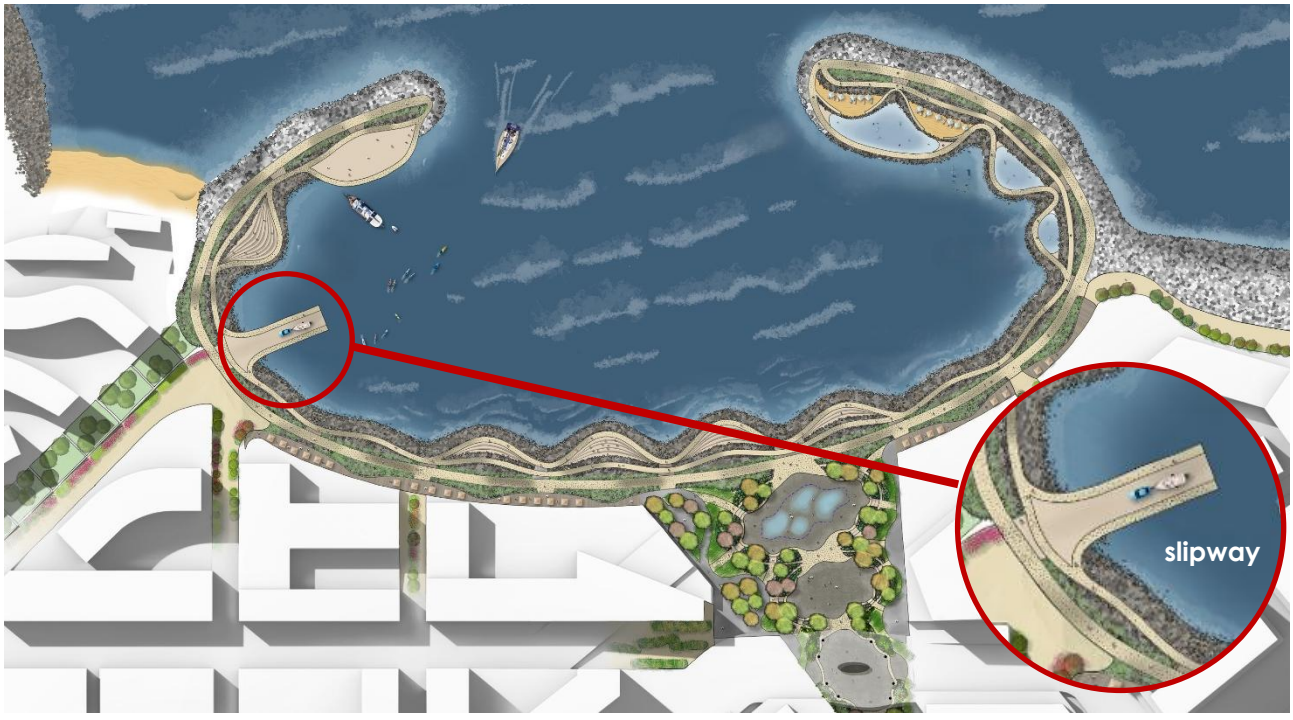



**Figure E2: Proposed conceptual land uses and public amenities.**

## Environmental Impact Assessment team

The applicant and landowner is **V&A Waterfront Holdings (Pty) Ltd**, a privately-owned South African company with local shareholding.

The V&A Waterfront has appointed **Infinity Environmental (Pty) Ltd.** as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping and EIA for this application. The terms of

reference for this appointment have been determined with reference to the requirements of the relevant legislation, namely the NEMA EIA Regulations, 2014 (as amended). The EAPs responsible for this Scoping and EIA are Jeremy Rose and Tarryn Solomon, both duly registered with the Environmental Assessment Practitioners Association of South Africa (EAPASA). Contributors to this Scoping Report include Candidate EAPs Olivia Murgatroyd, Kelly Gilmour, Kaylyn Heinrich, and Kudakwashe Chimatira.

The team includes various specialists who have prepared draft Impact Assessments. These assessments have progressed to a greater level of detail than typically included in a Scoping Report, in order to meet the requirements of the ICMA land reclamation applications for pre-approval. They will continue to be updated during the Scoping and EIA phase as required. The EIA team is supported by a professional team appointed by V&A Waterfront, including town planning, engineering, and urban design experts. Input received during the commenting period on the Pre-Application Draft Scoping Report resulted in the addition of a Climate Change Impact Assessment to the list of specialist studies to be undertaken as part of the EIA process.

The specialist studies listed in Table E1 below will be undertaken.

**Table E1: Environmental Impact Assessment Team**

| Specialist study | Organisation | Name |
|---|---|---|
| **Visual Impact Assessment** | Megan Anderson Landscape Architects | Megan Anderson |
| **Heritage Impact Assessment** | - | Cindy Postlethwayt |
| **Archaeological Assessment** | TerraMare Archaeology | John Gribble |
| **Oceanographic Impact Assessment** | WML Coast | Enrique Julyan |
| **Marine Impact Assessment** | Anchor Environmental Consultants | Dr Barry Clark, Amy Wright, Megan Jackson & Adam Rees |
| **Marine Mammal Specialist Study** | Sea Search Research and Conservation | Dr Simon Elwen |
| **Socio-economic Assessment** | Urban Econ Development Economists | Alex Kempthorne & Mwajuma Kamanzi |
| **Traffic Impact Assessment** | Motion Consulting Engineers | Sergei Kiewiet |
| **Climate Change Impact Assessment** | SRK Consulting | Philippa Burmeister & Joss Cahi |

## Site Sensitivities and Potential Impacts

The Granger Bay Precinct is a transformed site due to its location in an urban area. The main environmental sensitivities for the site are identified in the graphic below.

**Heritage Resources**

The site and surrounding area have a rich history and historical resources that date back to before the 1600s. and therefore need to be considered and preserved on and surrounding the site. This includes considering potential marine archaeological resources, preserving view corridors and abiding by the relevant building restrictions.

### Socio-Economic Environment

This site is locally significant from a socio-economic perspective related to its central location in the City of Cape Town. The Granger Bay and V&A Waterfront areas are popular tourist destinations with a diverse array of attractions and public amenities linked to their proximity to the coast. The proposed development will provide a range of socio-economic opportunities during the construction and operational phases.

### Biophysical Environment

The proposed site is highly transformed, and there are likely no terrestrial sensitivities. However, the proposed development is located within a marine ecosystem with a threat status of Vulnerable, and adjacent to the Robben Island Marine Protected Area. The western portion of the site is in an Ecological Support Area, with the entire site in the Table Bay West Coast rock lobster sanctuary, where the removal of lobsters is prohibited.

Table Bay includes the coastline from Mouille Point to Bloubergstrand, which contains the Port of Cape Town and the proposed site in the Granger Bay precinct. Table Bay falls within the southern Benguela current ecosystem, which is one of the most productive ecosystems in South Africa due to upwelling that provides marine species with nutrients and enhances biological productivity. Sheltered bays such as Table Bay are essential in temperate marine environments because they provide sheltered areas for marine species.

The site contains two marine ecosystems, namely the Cape Kelp Forest and the Cape Mixed shore, that will be impacted during land reclamation and construction activities. Additionally, the proposed development may impact sensitive marine species such as the Heaviside's dolphin, the West Coast rock lobster and galjoen.

The proposed development will impact the environmental sensitivities discussed above. The issues and impacts identified for the proposed development are based on a preliminary consideration of the current proposed alternative as well as the status quo information presented in Chapter 3 of this report. The Scoping Phase is intended to **identify** possible impacts that will be **assessed** in detail by specialists during the EIA Phase. Some of the key potential impacts (both positive and negative) identified during the Scoping Phase are:

- Impact of construction noise and vibrations on marine species
- Change in habitat and ecosystem functioning
- Impact of increased vessel traffic on the marine ecosystem
- Oceanographic impacts during the operational phase due to the land reclamation
- Socio-economic impact of land reclamation on local residents and existing users of the site
- Impact on economic production, employment, household income and government revenue
- Impacts on recreational boat use in Granger Bay
- Impact on tourism and marine wildlife-associated activities

- Impact on public space, coastal access and amenity value
- Visual impacts during the construction and operational phases
- Impacts on heritage resources
- Impacts on the transport network
- Climate change-related impacts
- Impacts from noise, dust, waste generation, potential hazardous spills and pollution generation during construction

A detailed breakdown of the impacts identified at this stage of the project is provided in Chapter 6.

## Need and Desirability

The consideration of "need and desirability" of a proposal is a key part of environmental impact assessment, which relates to the context, broader societal needs, and the public interest. This is discussed in detail in Chapter 5 of this report, and the key themes are summarised below:

- Negative environmental impacts can be mitigated and managed to acceptable levels.
- Mitigation measures are practical, feasible, and easily implementable.
- The proposed development will result in an increase in public amenities and coastal access within Granger Bay, which is currently very limited due to the nature of the shore protection infrastructure.
- The proposed development will improve shoreline protection infrastructure along the coast.
- The proposed development will result in increased employment opportunities and a boost in local economic activities.
- The proposed development aligns with various legislation, planning frameworks, and policy documents.

The review of the net effects of the proposed development and the trade-offs between positive and negative impacts suggests that positive effects and impacts would outweigh the negative effects. Although not developing the site would result in the avoidance of negative environmental impacts, from a socio-economic perspective, this would also result in the positive effects/impacts not being realised, as well as the potential degradation of coastal infrastructure and risks to public safety. Therefore, it is preferable from a safety, public amenity, coastal access, and socio-economic perspective that the proposed commercial development be constructed.

## Public Participation

A major part of the Scoping and EIA process is allowing the public the **opportunity to comment** on the application and the assessment of environmental impacts. A draft version of the Scoping Report was published for two pre-application public comment periods: from 31 July 2025 to 1 September 2025, and from 10 November 2025 to 10 December 2025 respectively, in compliance with Regulation 41 of the EIA Regulations, 2014 (as amended). The report included:

- the project proposal and identified alternatives,
- a description of the environment on and surrounding the site,
- an analysis of relevant policy and planning frameworks,
- a description of potential environmental impacts identified to date, and
- a plan for assessment of the identified issues and impacts.

Having been updated to incorporate and respond to comments received during public participation, this report is now submitted to DEADP for approval. A detailed account of the Public Participation Process for this project is provided in Chapter 7, detailing the various opportunities I&APs

have had and will have to comment on this application and assessment. **Appendix H** includes a detailed comments and responses report, and **Appendix I** (submitted only to the competent authority) contains the register of I&APs and proofs of public participation.

A database was prepared of potential interested and affected parties, including adjacent landowners and occupiers, ward councillors, municipal officials, relevant state departments and organs of state, and community-based organisations that may have an interest in or be affected by the proposed development. Notification letters were posted, emailed, or hand-delivered to all identified interested and affected parties informing them of the proposal, the opportunity to comment, and the availability of the pre-application Scoping Report for the first commenting period. Where neighbouring properties included sectional title or leased properties, the respective managing agents or property owners' associations were engaged with to assist in the distribution of notifications to their individual owners or lessees.

I&APs were requested to register their interest and to comment, and those who did so have been added to the database of registered I&APs. This database will continue to be updated throughout the process. All registered I&APs were notified via their preferred communication method about the availability of the Draft Scoping Report, which was made available for comment from Monday, 10 November 2025 to Wednesday, 10 December 2025.

Interested and Affected Parties may continue to register at any time throughout the Scoping and EIA process. **Any person who wishes to receive notifications of future comment periods must register as an interested and affected party by providing their contact information to the Environmental Assessment Practitioner at the details below.**

The draft Scoping Report and associated appendices were made available on the project website at www.infinityenv.co.za/grangerbay. A hard copy of the Scoping Report could also be viewed at the Sea Point public library.

I&APs were invited to submit comments or register their interest using any of the following methods:

Online at **www.infinityenv.co.za/grangerbay**

By email to **grangerbay@infinityenv.co.za**

By WhatsApp message to **060 524 7676**

For more information, to comment, or to arrange alternative ways of participating, Infinity Environmental can be contacted at the details above.

## Plan of Study

This Scoping and EIA process includes tasks required to fulfil the requirements of the NEMA EIA Regulations, 2014 (as amended). **Figure E3** is an overview of the process to be followed. Prior to the publishing of the pre-application Scoping Report as part of the first commenting period, an application for land reclamation was submitted to the Minister of Forestry, Fisheries and Environment in terms of section 7(C) of ICMA. The land reclamation process will run parallel to the Scoping and EIA process. More details on the integrated NEMA and ICMA process are provided in Chapter 1.

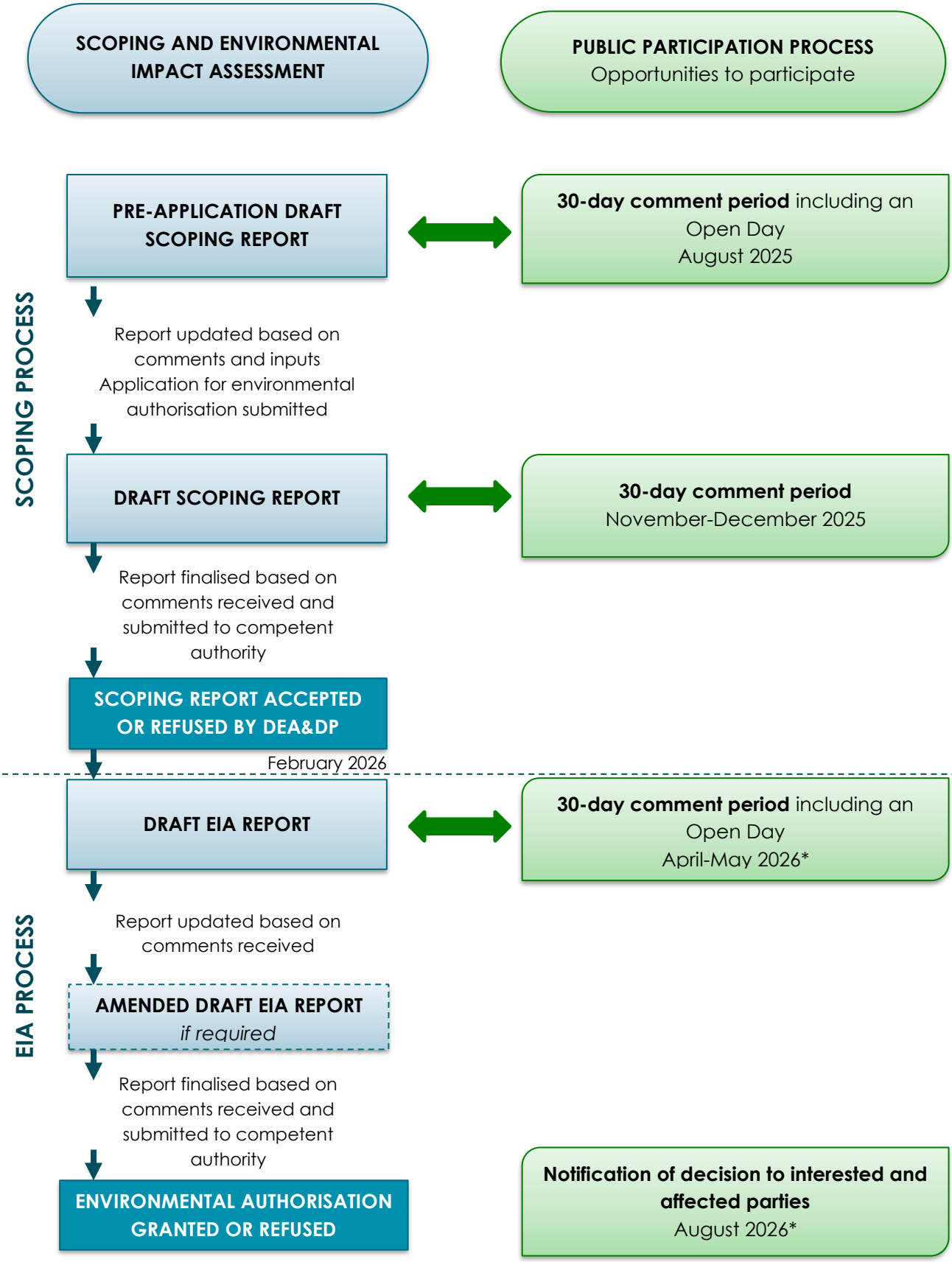



**Figure E3: Overview of the Scoping and EIA Process and associated public participation (*Subject to change).**

## Conclusion

The Scoping Report presents conceptual project proposals to the public and I&APs and identifies environmental issues and impacts associated with the proposed development. This allowed I&APs, authorities, and the project team, as well as specialists, to provide input and raise issues and concerns at an early stage.

The Scoping Phase is intended to identify impacts and risks, while the EIA phase is intended to determine the impacts and risks associated with the activity, and to assess alternatives identified in the Scoping phase, as well as alternatives recommended by the findings of environmental sensitivity studies.

The Environmental Assessment Practitioner is of the opinion that the information contained in this Scoping Report allowed I&APs and stakeholders to apply their minds to the potential positive and negative impacts associated with the proposed activities.

**Figure E4: Visualisation showing the proposed expansion of the Granger Bay precinct.**

# REPORT STRUCTURE

| | |
|---|---|
| Executive Summary | |
| Chapter 1 | Introduction |
| Chapter 2 | Legislation and Policy |
| Chapter 3 | Site Description |
| Chapter 4 | Project Proposal |
| Chapter 5 | Need and Desirability |
| Chapter 6 | Environmental Issues and Impacts |
| Chapter 7 | Public Participation |
| Chapter 8 | Plan of Study |
| Chapter 9 | References |
| Appendix A | Environmental Assessment Practitioner CV and Declarations |
| Appendix B | National Environmental Screening Tool Report |
| Appendix C | Site Sensitivity Verification Report |
| Appendix D | Draft Specialist Impact Assessments |
| Appendix E | Heritage Notification of Intent to Develop |
| Appendix F | Service Capacity Confirmations |
| Appendix G | Wave and Hydrodynamic Modelling Study |
| Appendix H | H1: Comments and Responses Report for first public comment period<br>H2: Comments and Responses Report for second public comment period |
| Appendix I | •Proofs of public participation and copies of comments received<br>•I&AP Register |

## Abbreviations and Acronyms

| | |
|---|---|
| AIA | Archaeological Impact Assessment |
| CBA | Critical Biodiversity Area |
| CBD | Central Business District |
| CCT | City of Cape Town |
| CFR | Cape Floristic Region |
| CPR | Cape Peninsula Renosterveld |
| DEA&DP | Department of Environmental Affairs and Development Planning |
| DFFE | Department of Forestry Fisheries and the Environment |
| DSDF | District Spatial Development Framework |
| EA | Environmental Assessment |
| EAP | Environmental Assessment Practitioner |
| EAPASA | Environmental Assessment Practitioners Association of South Africa |
| EIA | Environmental Impact Assessment |
| EMF | Environmental Management Framework |
| ESA | Ecological Support Area |
| GDP | Gross Domestic Product |
| GN | General Notice |
| GNR | General Notice Regulation |
| HIA | Heritage Impact Assessment |
| HWC | Heritage Western Cape |
| ICMA | National Environmental Management: Integrated Coastal Management Act (Act 24 of 2008) |
| I&APs | Interested and Affected Parties |
| IDP | Integrated Development Framework |
| MIA | Marine Impact Assessment |
| MOCAA | Zeitz Museum of Contemporary Art Africa |
| MPA | Marine Protected Area |
| MSDF | Municipal Spatial Development Framework |
| NEMA | National Environmental Management Act (Act 107 of 1998) |
| NEM: BA | National Environmental Management Biodiversity Act (Act 10 of 2004) |
| NEM: WA | National Environmental Management Waste Act (Act 59 of 2008) |
| NHRA | National Heritage Resources Act (Act 25 of 1999) |
| NID | Notice of Intent to Develop |
| masl | Metres above sea level |
| OIA | Oceanographic Impact Assessment |
| PoS | Plan of Study |
| PPP | Public Participation Process |
| PRASA | Passenger Rail Agency of South Africa |
| PSDF | Provincial Spatial Development Framework |
| SAHRA | South African Heritage Resources Agency |
| SAM | Social Accounting Matrix |
| SAMSA | South African Maritime Safety Authority |
| SATS | South African Transport Services Act (Act 9 of 1989) |
| SEIA | Socio-Economic Impact Assessment |
| SDF | Spatial Development Framework |
| SPLUMA | Spatial Planning, Land Use and Management Act (Act 16 of 2013) |
| TIA | Transport Impact Assessment |

## Tables and figures

# CHAPTER 1
# INTRODUCTION

**January 2026**

**Final Scoping Report**

Infinity Environmental

# 1 INTRODUCTION

**This chapter provides an overview of the proposed development of the Granger Bay Precinct, Erf 173712 and Erf 177853, at the V&A Waterfront. Chapter 1 includes:**

- Background and history of the site
- An overview of the proposed development
- Information on the applicant for Environmental Authorisation (EA)
- Details of the Environmental Assessment Practitioner (EAP) and the specialist team
- An outline of the objectives of the Scoping Report and
- Confirmation of how the requirements for a Scoping Report in terms NEMA and ICMA are met by this document

## 1.1 Background

V&A Waterfront Holdings (Pty) Ltd. ("the applicant" or "the V&A Waterfront") is proposing to reclaim land and construct coastal protection infrastructure to support new mixed-use development in the Granger Bay Precinct, which lies west of Beach Road and north of Granger Bay Boulevard in Cape Town (Figure 1-1). The proposal includes the replacement of existing coastal defence structures with a new revetment and breakwaters, and reclamation of land from Table Bay landward of these new structures, as well as new mixed-use development in the area landward of the existing coastal defence infrastructure.


**Figure 1-1: Locality map of the site and proposed land reclamation area**

Note: site extent has been slightly adjusted to align with cadastral boundaries on the western edge.

## 1.2 Legislative requirements

Due to the nature and location of the proposed development, the following environmental legislation is applicable:

» National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA); and
» National Environmental Management: Integrated Coastal Management Act, 2008 (Act 24 of 2008) (NEM: ICMA).

### 1.2.1 National Environmental Management Act 107 of 1998

Section 24 of NEMA provides for the listing of activities that have, or are likely to have, a negative environmental impact and which require Environmental Authorisation (EA) prior to commencement. Three EIA Regulation Listing Notices were published in 2014 (GN R. 983 to 985, as amended) to identify activities that require EA. Where activities in the Listing Notices are proposed, an assessment process as stipulated in the EIA Regulations, 2014, must be undertaken to inform an EA application.

Since activities from Listing Notice 2 are proposed, this application will follow a Scoping and EIA process in terms of the 2014 EIA Regulations, as amended. The competent authority for the Scoping and EIA process is determined based on section 24C of NEMA, and the competent authority for this proposal is the provincial authority, the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP).

**Listed Activities applicable to the proposed development:**

- Listing Notice 1 (GN 327 of 2017): Activity 9, 15, 17 and 19A
- Listing Notice 2 (GN 325 of 2017): Activity 14, 23 and 26

### 1.2.2 National Environmental Management: Integrated Coastal Management Act

The proposed development will require the reclamation of land in terms of the Integrated Coastal Management Act (Act 24 of 2008) from Table Bay to accommodate new coastal public amenities and new mixed-use development.

Section 7C of the ICMA governs the reclamation of land from the sea for purposes other than the construction of state infrastructure and sets out the process and approvals required. The proposed reclamation of land must be pre-approved by the national Minister for Environmental Affairs, and this pre-approval must be ratified by Parliament. Reclamation will be considered only where it does not conflict with the purposes of coastal public property, namely, to improve public access to the seashore, to protect sensitive coastal ecosystems, to secure the natural functioning of coastal processes, and to provide protection from dynamic coastal processes, including sea level rise.

An application for pre-approval of land reclamation is required to be made to the national Minister of Environmental Affairs prior to the submission of an application in terms of NEMA. The statutory process applicable to the reclamation and the alignment of this process with the Scoping and EIA, are expanded on in Chapter 2 of this report.

## 1.3 Purpose of this report

This Final Scoping Report forms part of the Scoping and Environmental Impact Assessment process in terms of the NEMA and the EIA Regulations. It identifies the environmental issues and impacts that will be further assessed in the EIA process, and sets out a plan for the studies, assessments, and participation processes that will be undertaken. The draft Scoping Report was shared with the public, the competent authority, and other government departments for review and comment, so that concerns and issues can be raised and addressed at an early stage. Following public consultation, this Final Scoping Report is submitted to the competent authority for approval before the EIA process is started.

## 1.4 Site location

The project site forms part of the V&A Waterfront and is located within the Granger Bay Precinct, which lies west of Beach Road and north of Granger Bay Boulevard near Cape Town's Central Business District (CBD). The V&A Waterfront is situated in Cape Town along the Table Bay coast, spanning an area of approximately 123 hectares (ha) and set against the backdrop of the working harbour. The area includes the main commercial zone with its shopping mall, hotels, restaurants, and entertainment venues, as well as sites such as the Two Oceans Aquarium and the Zeitz Museum of Contemporary Art Africa (MOCAA). The V&A Waterfront has been developed since the 1990s around the Victoria and Alfred Basins, themselves dating back to the 19th century as part of the Cape Town Harbour. Road access is possible from various major routes, including the N1 and N2 freeways, and the Helen Suzman Boulevard (M6), which connects the area with the Atlantic seaboard.

The project site includes:

- A portion of Erf 173712 seawards of the 100m setback from the highwater mark;
- A portion of Erf 177853 (undeveloped land between Erf 173712 and the highwater mark); and
- Land to be reclaimed from the sea below the highwater mark, with the east breakwater - being approximately 140m offshore of the present shoreline.

## 1.5 History of the site and background to the proposed development

The proposed site and surroundings have a long and significant history, with records dating back to before the 1600s. The Granger Bay Precinct is part of a stretch of coastal plain which once extended from Buitengracht to beyond Mouille Point, of which the Green Point Common represents the remaining part. Until the 19th century, the coastal plain was characterised by calcrete dunes, which were flattened during the late 19th and 20th centuries to make way for the Granger Bay Marina and related infrastructure. Fort Wynyard is located on the last surviving low dune. Beach Road, immediately to the south of the site, was located on the coastline, and land reclamation associated with Granger Bay Marina and The Water Club occurred during the 1980s and 1990s.

In 1987 it was proposed that the docklands surrounding the Victoria and Alfred Basins of the Cape Town Harbour be redeveloped for mixed use urban development, and in 1989, the Legal Succession to the South African Transport Services Act, Act 9 of 1989 (SATS Act) was promulgated to enable the landowner of the harbour at the time (Transnet), and the City of Cape Town to reach an agreement on the development rights for the V&A Waterfront property of approximately 123 ha to be exercised over the long-term, factoring in market demand.

A brief history of the settlement and fortifications, development of the harbour and 20th century developments is summarised below (Figure 1-2). More details on the history of the site can be found in Chapter 3.


**Figure 1-2: Brief summary of the history of the Granger Bay area**

The V&A Waterfront has developed incrementally for commercial and residential uses over the course of three decades, gradually densifying and expanding in response to demand and in accordance with the original vision for the area. The Granger Bay precinct, within which the proposed development is located, is located between the Victoria Wharf area and the Cape Town Stadium. It has not yet developed to its full potential, and includes a number of current temporary land uses, as shown in Figure 1-3: the Oceana Power Boat Club, the Grand Café & Beach Restaurant, the previous site of the Oranjezicht Market [relocated in late 2025], parking areas, stockpiles of fill material, and newly constructed sections of coastal walkway.

Environmental Authorisation was granted in 2018 by DEA&DP for the development of a dolos revetment, reclamation of land from the sea, and mixed-use development on Erf 173712. This development of approximately 1.6 ha in extent included residential, retail, and commercial components as well as private open space. More details regarding the approved scheme are included in Chapter 2. The 2018 Scheme has not yet been implemented, and the V&A Waterfront has instead proposed a new design for this area, which is the subject of the current application and this Scoping Report.


**Figure 1-3: Existing land uses on and adjacent to the proposed site**

## 1.6 Proposed development

The proposed development incorporates the reclamation of approximately 3.2 hectares of land from Table Bay to accommodate new coastal public amenities and new mixed-use development. This reclamation will be protected by a new permanent rock revetment and two ('east' and 'west') breakwaters forming a new protected bay approximately 3 hectares in extent. The west breakwater will extend approximately 90 metres into Table Bay, and the east breakwater approximately 140 metres. A revetment connecting the two breakwaters will be approximately 540 metres long. No development will occur in the new bay formed by the breakwaters and revetment. The proposed revetment and breakwaters will be constructed in phases over approximately 3 years.

New mixed-use development is proposed on the portion of the site currently located within 100 metres of the highwater mark, which will accommodate residential, hotel, leisure, and commercial uses, with residential accommodation options such as hotels, serviced apartments, and private apartments. The orientation and massing of buildings will respond to the coastal setting and maximise outward views of the ocean. Approximately 78 000 $m^2$ of bulk will be allocated from the existing development rights permitted within the V&A Waterfront. Development rights are already in place for a portion of the Granger Bay precinct not included in this Scoping and EIA (shown in grey in Figure 1-4).

New public amenities will include the new bay, providing sheltered waters for boating, kayaking, and swimming. Land-based amenities will include a coastal public walkway, a slipway, a fixed quayside, a landscaped promenade, tidal pools, pedestrian paths, and open areas. Access to the coastline is a key principle of the development, as envisaged in the Integrated Coastal Management Act. The development plans include a new coastal public walkway and a landscaped promenade, which allow for an uninterrupted coastal boardwalk from the V&A Waterfront through Granger Bay to connect via Beach Road with the Sea Point Promenade. This will be accessible to the public in the same way that the other public areas in the Waterfront are open to the public.

The Granger Bay development will be supported by various transport modes, including MyCiTi, Park & Ride, and micro-mobility services, with enhanced integration between these modes. No major access road upgrades are proposed.

Wastewater management, potable water supply, solid waste removal and disposal, and electricity supply will be accommodated within the existing infrastructure capacity. Service requirements are anticipated to include the following:

- Potable water will be supplied from the City of Cape Town, supplemented in future by the V&A Desalination Plant, which has been designed for current water demands and future growth of the property, including the application site.
- Wastewater generated from the development will be discharged to the municipal sewer system (in the Green Point marine outfall catchment) in the short term, and it is anticipated that in the longer term it will be treated by a new wastewater treatment plant to be constructed by the V&A Waterfront. No additional sewer upgrades will be required as they fall within the existing bulk rights, and the future plant does not form part of the application.
- The V&A Waterfront stormwater network is self-contained, with no upgrades needed to the City of Cape Town's system. An existing 1.5m diameter stormwater drain in Granger Bay will be extended to the new revetment and designed to accommodate storm surge events. Additional outfalls are planned through the sea wall/revetment. Basic on-site stormwater quality management is planned.

» A full new electrical distribution network is planned for the site. The design of this proposed new infrastructure has been carried out based on preliminary discussions held with the CoCT. The V&A's solid waste handling centre has existing capacity to manage the proposed waste generated from the proposed developments.

» More detail on the service requirements for the proposed development is provided in Chapter 4 of this report.

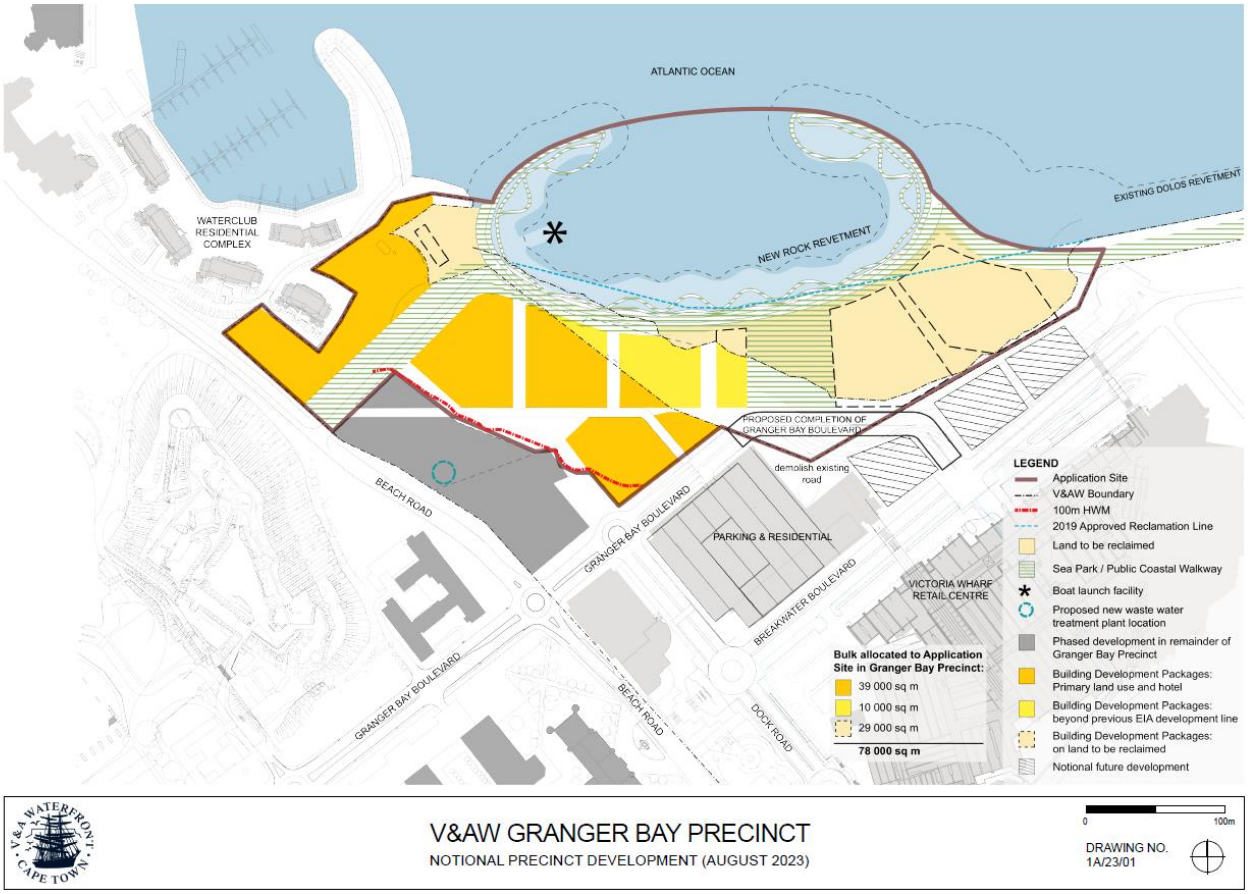



**Figure 1-4: Proposed development and expansion of the V&A Granger Bay Precinct**

## 1.7 Applicant

The applicant and landowner is **V&A Waterfront Holdings (Pty) Ltd**, a privately-owned South African company with local shareholding.

## 1.8 EIA team

The V&A Waterfront has appointed **Infinity Environmental (Pty) Ltd.** as the independent Environmental Assessment Practitioner (EAP) to undertake the Scoping and EIA for this application. The terms of reference for this appointment have been determined with reference to the requirements of the relevant legislation, namely the NEMA EIA Regulations, 2014 (as amended).

The EAPs responsible for this Scoping and EIA are Jeremy Rose and Tarryn Solomon, both duly registered with the Environmental Assessment Practitioners Association of South Africa (EAPASA). Contributors to this Scoping Report include Candidate EAPs Olivia Murgatroyd, Kelly Gilmour, Kaylyn Heinrich, and Kudakwashe Chimatira. Jeremy Rose is a registered EAP and Professional Natural Scientist with more than eleven years' experience in environmental management. Tarryn Solomon is

a registered EAP with over 18 years' experience in environmental assessment. The curricula vitae of the EAPs are attached as Appendix A, together with the required declarations and undertakings.

The team includes various specialists who have prepared draft Impact Assessments (or will prepare Impact Assessments as part of the EIA phase). Some of these assessments have progressed to a greater level of detail than typically included in a Scoping Report, in order to meet the requirements of the ICMA land reclamation applications for pre-approval. They will continue to be updated during the EIA phase as required. The EIA team is supported by a professional team appointed by V&A Waterfront, including town planning, engineering, and urban design experts. The EIA team is listed in Table 1-1 below.

**Table 1-1: Environmental Impact Assessment Team**

| Name | Qualifications and registrations | Role | Organisation |
|---|---|---|---|
| **Jeremy Rose** | B.Sc. Hons, Reg. EAP 2019/1116, Pr.Sci.Nat 120148 (Environmental Science) | Environmental Assessment Practitioner (EAP) | Infinity Environmental |
| **Tarryn Solomon** | B.Sc., Reg. EAP 2019/1116 | EAP (Internal review) | |
| **Olivia Murgatroyd** | M.Sc., Cand. EAP, Cand.Sci.Nat. | Candidate EAPs | |
| **Kelly Gilmour** | M.Sc., Cand. EAP, Cand.Sci.Nat. | | |
| **Kaylyn Heinrich** | B.Sc. Hons, Cand. EAP, Cand.Sci.Nat. | | |
| **Kudakwashe Chimatira** | B.Sc. Hons, Cand. EAP, Cand.Sci.Nat. | | |
| **Cindy Postlethwayt** | B Soc Sci<br>MCRP<br>APHP<br>Pr.Plan. | Heritage Practitioner | Cindy Postlethwayt |
| **Megan Anderson** | Pr.L.Arch | Visual Impact Assessment Specialist | Megan Anderson Landscape Architects |
| **John Gribble** | M.A.<br>ASAPA | Archaeological Impact Assessment Specialist | TERRAMARE ARCHAEOLOGY |
| **Enrique Julyan** | MSc Eng<br>Pr Eng | Oceanographic Impact Assessment Specialist | WML COAST CONSULTING ENGINEERS |
| **Amy Wright** | MSc<br>Pr.Sci.Nat | Marine Impact Assessment | ANCHOR environmental |
| **Megan Jackson** | MSc | | |
| **Dr Adam Rees** | PhD<br>Pr.Sci.Nat | | |
| **Dr Barry Clark** | PhD | | |

| Name | Qualifications and registrations | Role | Organisation |
|---|---|---|---|
| **Dr Simon Elwen** | PhD | Marine Mammal Specialist | |
| **Alex Kempthorne** | Master's in City and Regional Planning SAPOA | Socio-economic Assessment | |
| **Mwajuma Kamanzi** | MCom (Economics) | | |
| **Sergei Kiewiet** | BSc Engineering (Civil) | Transport Impact Assessment | |
| **Philippa Burmeister** | Pr.Sci.Nat Reg.EAP | Climate Change Impact Assessment | |
| **Joss Cahi** | Hydrologist | | |

## 1.9 Objectives for the Scoping Process

Scoping is one part of the EIA process, which is graphically illustrated in Figure E3. The primary objective of this Scoping Report is to provide an overview of the proposed project and key issues that require assessment during the EIA phase, and to allow the opportunity for the identification of additional issues that may require assessment. The Scoping Phase begins with the compilation of a Scoping Report, which provides an overview of the proposed project, providing context for the proposal, and includes information obtained from draft impact assessments and baseline studies. This report has been amended based on inputs received from I&APs during the first 30-day commenting period. An application for environmental authorisation has been submitted, and the Draft Scoping Report was made available for a further 30-day commenting period. The Draft Scoping Report will be finalised based on inputs received and submitted to the competent authority (DEA&DP) for approval (**this report**). The objectives will be achieved through parallel processes of consultation with state departments that administer related legislation; participation by the public and interested and affected parties, including nearby landowners and occupiers, to ensure that local issues are understood; and scientific and technical assessment by the EIA and technical teams.

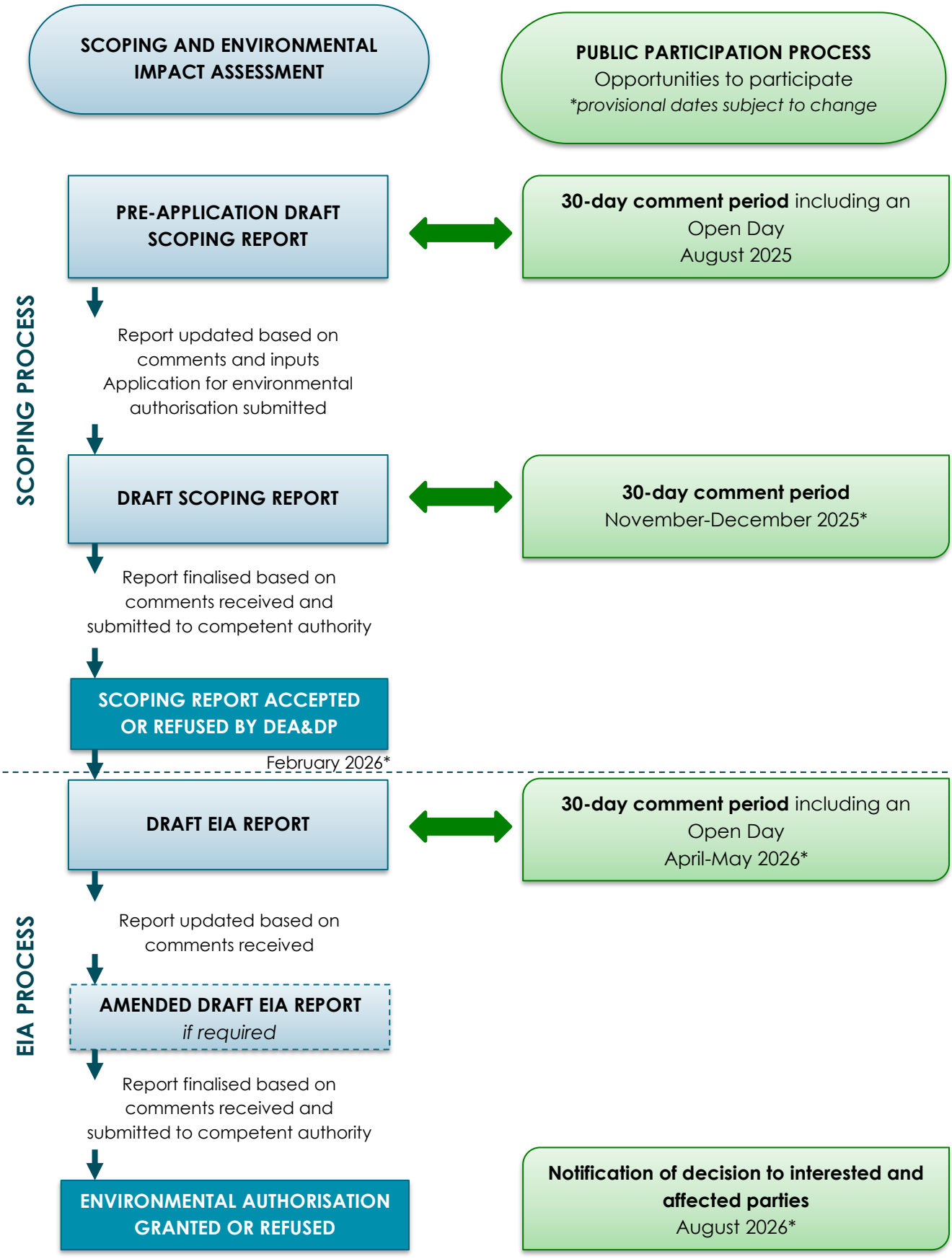



**Figure 1-5: Overview of the Scoping and EIA Process and associated public participation**

## 1.10 Structure and contents of this report

**What is a Scoping Report?**
A scoping report is the first step in an environmental impact assessment. It sets the scene by describing the proposed activity, as well as alternatives that have been considered. It also describes the biophysical characteristics of the proposed site and its environs and the socioeconomic context of the area in which the activity is proposed. Potential environmental and socio-economic impacts are identified with possible mitigation measures, and a plan of study is developed detailing the scope for the EIA phase.

The primary objective of the Scoping Report is to present key stakeholders (including affected organs of state) with an overview of the proposed project and key issues that require assessment in the EIA Phase and allow the opportunity for the identification of additional issues that may require assessment.

This Scoping Report provides information relevant to the project and identifies potential impacts of the project as well as methodologies for the assessment thereof during the impact assessment phase. The required contents are stipulated in Appendix 2 of the EIA Regulations, 2014, which specifies the objectives of the Scoping process as including:

- Identification of policies and legislation relevant to the activity;
- Consideration of the need and desirability of the proposed activity;
- Identification and ranking of impacts and risks;
- Identification and confirmation of the preferred site for the project, focusing on the geographical, physical, biological, social, economic, and cultural aspects of the environment;
- Identification of the key issues to be addressed in the Environmental Impact Assessment phase that follows Scoping;
- Determination of the level of assessment to be undertaken to determine the impacts and risks the activity will impose on the preferred site through the life of the activity; and
- Identification of suitable measures to avoid, manage or mitigate identified impacts and to determine the extent of the residual risks that need to be managed and monitored.

The report is structured as follows:

- Chapter 1 provides background and an introduction to the project and the EIA process
- Chapter 2 sets out the legislative and policy context relevant to the application
- Chapter 3 describes the site and its surroundings in relation to environmental sensitivities
- Chapter 4 explains the project proposal, and describes alternative proposals considered
- Chapter 5 explores the motivation for the project, and considers need and desirability
- Chapter 6 identifies and describes the potential environmental impacts to be assessed
- Chapter 7 details the public participation processes to be conducted
- Chapter 8 is a plan of study for the EIA process
- Chapter 9 is a bibliography

Appendices to the report include specialist assessments conducted to date, and technical and related information summarised in the Scoping Report.

### 1.10.1 Requirements of the National Environmental Management Act EIA Regulations

In terms of legal requirements, the Scoping Report must satisfy the requirements of Appendix 2 of the amended 2017 NEMA EIA Regulations (as noted in Regulation 21 (3) of the GN R326). Table 1-2 outlines how the legislated requirements are addressed in this Scoping Report.

**Table 1-2: Requirements of Appendix 2 of the amended 2017 NEMA EIA Regulations (as noted in Regulation 21 (3) of the GN R326).**

| Section of Appendix 2 to the EIA Regulations (NEMA) | Content requirement | Report Section |
|---|---|---|
| 2. (1) (a) | Details of -<br>i. the EAP who prepared the report; and<br>ii. the expertise of the EAP, including a curriculum vitae; | Appendix A |
| 2. (1) (b) | the location of the activity, including—<br>(i) the 21-digit Surveyor General code of each cadastral land parcel;<br>(ii) where available, the physical address and farm name;<br>(iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties; | Section 1.4<br>Chapter 3 (Section 3.1) |
| 2. (1) (c) | (c) a plan which locates the proposed activity or activities applied for at an appropriate scale, or, if it is—<br>(i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or<br>(ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken; | Section 1.6 |
| 2. (1) (d) | a description of the scope of the proposed activity, including—<br>(i) all listed and specified activities triggered;<br>(ii) a description of the activities to be undertaken, including associated structures and infrastructure; | Section 1.2 |
| 2. (1) (e) | a description of the policy and legislative context within which the development is proposed, including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process; | Chapter 2 |
| 2. (1) (f) | a motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location; | Chapter 5 |
| 2. (1) (g) | a full description of the process followed to reach the proposed preferred activity, site and location of the development footprint within the site, including—<br>(i) details of all the alternatives considered; | Chapter 4 (Section 4.) and Chapter 7 |

| Section of Appendix 2 to the EIA Regulations (NEMA) | Content requirement | Report Section |
|---|---|---|
| | (ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;<br>(iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them;<br>(iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;<br>(v) the impacts and risks which have informed the identification of each alternative, including the nature, significance, consequence, extent, duration and probability of such identified impacts, including the degree to which these impacts—<br>(aa) can be reversed;<br>(bb) may cause irreplaceable loss of resources; and<br>(cc) can be avoided, managed or mitigated;<br>(vi) the methodology used in identifying and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;<br>(vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;<br>(viii) the possible mitigation measures that could be applied and level of residual risk;<br>(ix) the outcome of the site selection matrix;<br>(x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and<br>(xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity; | |
| 2. (1) (h) | A plan of study for undertaking the environmental impact assessment process to be undertaken, including—<br>(i) a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity;<br>(ii) a description of the aspects to be assessed as part of the environmental impact assessment process;<br>(iii) aspects to be assessed by specialists; | Chapter 8 (Section 8.4) |

| Section of Appendix 2 to the EIA Regulations (NEMA) | Content requirement | Report Section |
|---|---|---|
| | (iv) a description of the proposed method of assessing the<br>environmental aspects, including aspects to be assessed by specialists;<br>(v) a description of the proposed method of assessing duration and significance;<br>(vi) an indication of the stages at which the competent authority will be consulted;<br>(vii) particulars of the public participation process that will be conducted during the environmental impact assessment process; and<br>(viii) a description of the tasks that will be undertaken as part of the environmental impact assessment process;<br>(ix) identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored. | |
| 2. (1) (i) | An undertaking under oath or affirmation by the EAP in relation to—<br>(i) the correctness of the information provided in the report;<br>(ii) the inclusion of comments and inputs from stakeholders and interested and affected parties; and<br>(iii) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties; | Appendix A, Chapter 7 (Section 7.1) |
| 2. (1) (j) | An undertaking under oath or affirmation by the EAP in relation to the level of agreement between the EAP and interested and affected parties on the plan of study for undertaking the environmental impact assessment; | Appendix A |
| 2. (1) (k) | Where applicable, any specific information required by the competent authority | N/A |
| | Any other matter required in terms of section 24(4)(a) and (b) of the Act. | |

## 1.11 Parallel process in terms of the National Environmental Management: Integrated Coastal Management Act, 2008

The proposed development requires both a Scoping and EIA process and an application to the Minister in terms of the ICMA. The Scoping and EIA process is required in terms of the 2014 EIA Regulations, as amended, and the competent authority for the Scoping and EIA process is determined based on section 24C of NEMA as the provincial authority, the Western Cape's DEA&DP.

In terms of section 7C of the Integrated Coastal Management Act (Act 24 of 2008), the reclamation of land requires a pre-approval by the national Minister of Environmental Affairs (DFFE) to be ratified by Parliament, prior to an environmental authorisation being issued in terms of NEMA, and a final decision by the Minister after an environmental authorisation is granted.

The intended integration of the two processes has been clarified by the two authorities involved and is summarised in Figure 1-6 below. Notable interactions between the processes include:

- The land reclamation application must be submitted to the national authority before an application for EA can be submitted to DEADP.
- Both processes involve specialist studies of potential impacts on the environment. Because these studies are required at an early stage in the ICMA application process, they have been concluded earlier than would ordinarily be the case in a Scoping and EIA. Specialist studies included in this Scoping Report are draft impact assessments, to be updated and finalised during the EIA phase.
- The Scoping and EIA process will occur in parallel with the Ministerial Pre-approval and Parliamentary Ratification of the application for reclamation.
- Ministerial Pre-approval is required to be submitted to DEADP along with the final EIA Report.
- DEADP will make a decision on the application for EA based on the information presented in the final EIA Report.
- The Environmental Authorisation is required for the Minister to make a final decision on the land reclamation application.

On 24 July 2025, DFFE confirmed in a letter to the V&A Waterfront that "the V&AW pre-approval application has been received by DFFE on 11 July 2025; consequently, V&AW is at liberty to apply for an environmental authorisation with the relevant Competent Authority."

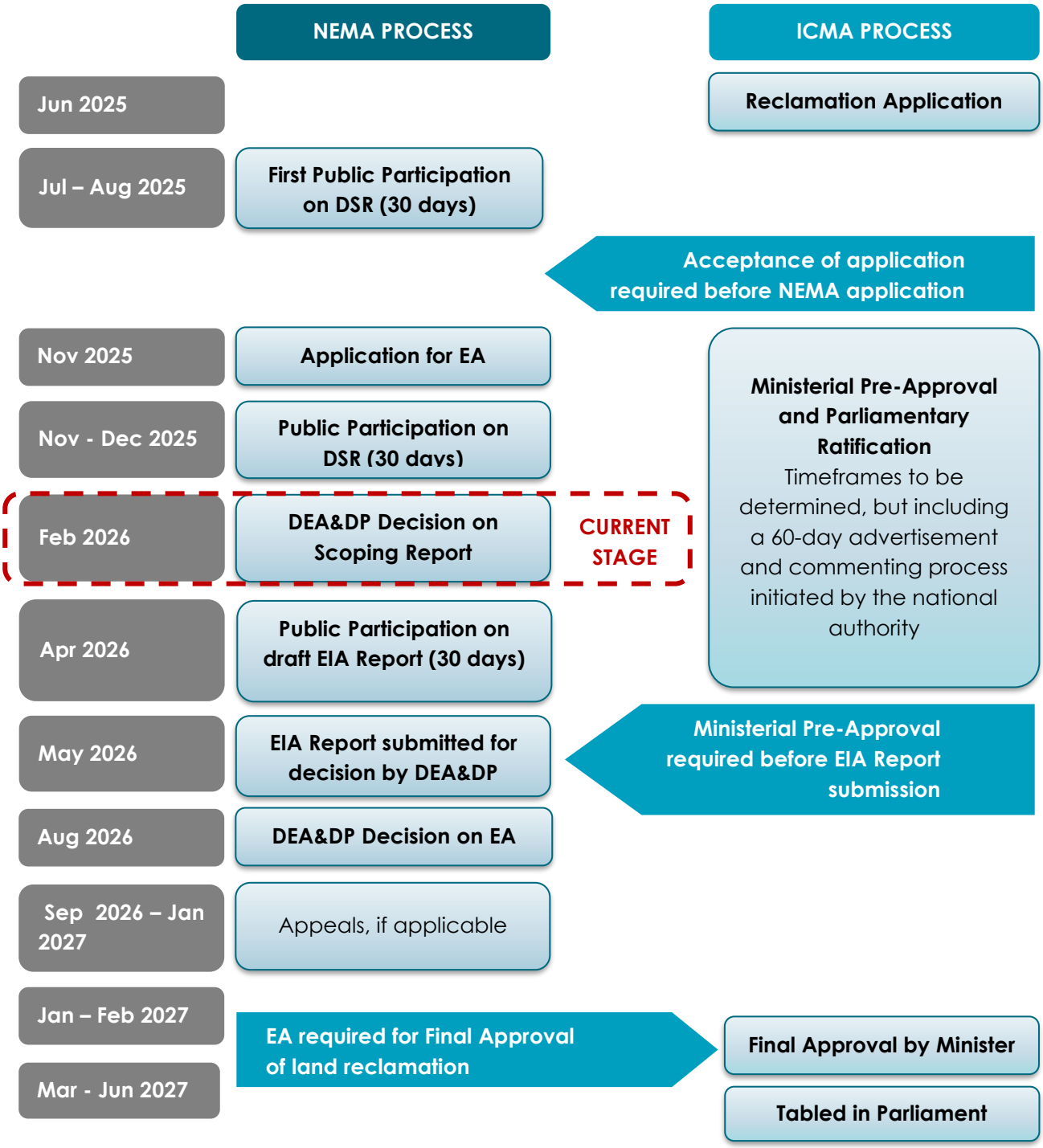



**Figure 1-6: The Scoping and EIA process to be followed alongside the ICMA application, with approximate dates.**

# CHAPTER 2
# LEGISLATION AND POLICY

**January 2026**

**Final Scoping Report**

Infinity Environmental

# 2 LEGISLATION AND POLICY

This chapter sets out the legislative context and guidelines for environmental assessment as applied to the proposed expansion of the Granger Bay Precinct, Erf 173712 and Erf 177853, at the V&A Waterfront. It also outlines applicable planning, policy and guideline considerations which have informed the project proposal and which will be further considered in this Scoping and EIA process. Existing approvals are described as well as other developments in the V&A Waterfront, which contextualise the site. Further analysis of the compatibility of the development proposals with applicable planning and policy is provided in Chapter 5.

## 2.1 Overview

The acts, regulations, by-laws, frameworks, policies and strategies relevant to the proposed development are listed below. The applicability and implications of these for the proposed development are described in this chapter.

**Acts**

- National Environmental Management Act – NEMA (107 of 1998), as amended
- National Environmental Management: Integrated Coastal Management Act – NEM: ICMA (Act 24 of 2008)
- National Environmental Management: Biodiversity Act – NEM: BA (Act 10 of 2004)
- National Environmental Management: Waste Act (Act 59 of 2008)
- Marine Living Resources Act – MLRA (Act 18 of 1998), as amended
- Marine Spatial Planning Act – MSPA (Act 16 of 2018)
- Sea Birds and Seals Protection Act (Act 46 of 1973)
- National Heritage Resources Act – NHRA (Act 25 of 1999)
- Legal Succession to the South African Transport Services Act – SATS (Act 9 of 1989)
- Spatial Planning and Land Use Management Act – SPLUMA (Act 16 of 2013)

**Regulations**

- Environmental Impact Assessment Regulations (2014) as amended (GNR 326 of 2017)
- NEM: BA Alien and Invasive Species Regulations (2014)
- NEM: BA Threatened or Protected Species Regulations (2007)
- Provincial Noise Control Regulations (PN 200 of 2013)

**By-laws**

- Municipal Planning By-law, 2015
- Stormwater Management By-law, 2005
- Environmental Health By-law, 2003
- Coastal By-law, 2020
- Integrated Waste Management By-law, 2009
- Recreational Water-use By-law, 2018
- Streets, Public Places and Prevention of Noise Nuisance By-law, 2007
- Traffic By-law, 2021

**Planning Frameworks**

- Western Cape Spatial Development Framework (2014)
- City of Cape Town Spatial Development Framework (2023)
- City of Cape Town Local Municipality Integrated Development Plan (2022 – 2027)
- City of Cape Town Comprehensive Integrated Transport Plan (2023 – 2028)
- Transit Oriented Development Strategic Framework (2016)
- Table Bay District Spatial Development Framework (2023)
- National Coastal and Marine Spatial Biodiversity Plan (2022)
- Draft Marine Biodiversity Sector Plan (2024)

**Policies and Strategies**

- Biodiversity Management Plan for the African Penguin
- City of Cape Town's Climate Change Strategy (2021)
- City of Cape Town Management of Urban Stormwater Impacts Policy (2009)
- Environmental Strategy for the City of Cape Town (2017)
- Integrated Coastal Management Policy of the City of Cape Town (2014)

Various guidelines have been and will be applied in the EIA phase, including those issued by DEA&DP in 2013 regarding public participation, alternatives and need and desirability.

## 2.2 Constitution of the Republic of South Africa, 1996

The environmental right enshrined in section 24 of the Constitution of South Africa's Bill of Rights states that:

> *Everyone has the right –*
>
> *(a) To an environment that is not harmful to their health or well-being; and*
>
> *(b) To have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that*
>
> *(i) prevent pollution and ecological degradation;*

*(ii) promote conservation; and*

*(iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.*

Section 24 recognises the integral importance of environmental protection and sustainability, while placing the needs of people at the forefront. It gives every citizen the right to live in a healthy environment and places an obligation on the government to act as a custodian, fostering sustainable development while safeguarding the wellbeing of both current and future generations. Section 24 also has significant implications for environmental remediation. The emphasis on the need for sustainable development (i.e., development that meets the needs of the present without compromising the ability of future generations to meet their own needs) considers the environment's long-term health and restoration and ensures that it can continue to provide ecological services and benefits to future generations. Section 24 mandates the government to take proactive measures to protect and restore the environment, as well as to create legislation to secure those goals. The key pieces of South African legislation that are applicable to the environmental impacts of the proposed development, with specific reference to the marine environment, are presented below.

## 2.3 National Environmental Management Act and EIA Regulations

### 2.3.1 National Environmental Management Act (Act 107 of 1998)

The National Environmental Management Act (NEMA, Act 107 of 1998) is the overarching framework for environmental law and management. NEMA makes provision for the identification and assessment of activities that are potentially detrimental to the environment, and which require authorisation from the relevant authorities based on the findings of an environmental assessment. These provisions are intended to give effect to the general objective of integrated environmental management and to integrate and facilitate environmental impact management with development activities, in line with sustainable development objectives.

### 2.3.2 Environmental Impact Assessment Regulations (2014) as amended (GNR 326 of 2017)

The National Environmental Management Act (107 of 1998) as amended, and the Environmental Impact Assessment Regulations (2014) as amended (GNR 326 of 2017), govern the process of applying for environmental authorisation for certain developments. Lists of activities which require environmental authorisation (EA) are published in three listing notices (GNR 982 to 984 of 2014, as amended by GNR 324, 325, and 327 of April 2017). Provision in the EIA Regulations is made for two forms of assessment: Basic Assessment and Scoping and EIA.

The EIA Regulations specify that:

- Activities identified in Listing Notice 1 (GNR 327 of 2017) require a Basic Assessment
- Activities identified in Listing Notice 2 (GNR 325 of 2017) require a Scoping and EIA
- Activities identified in Listing Notice 3 (GNR 324 of 2017) require a Basic Assessment

The listed activities associated with the proposed development are set out below:

**Table 2-1: Listed activities associated with the proposed development**

| Listed Activity | Description | Applicability |
|---|---|---|
| **Listing Notice 1 (GN 327 of 2017)** | | |
| **9** | The development of infrastructure exceeding 1000 metres in length for the bulk transportation of water or storm water— | The proposed development includes the extension of an existing 1.5m diameter stormwater drain located in |

| Listed Activity | Description | Applicability |
|---|---|---|
| | (i) with an internal diameter of 0.36 metres or more; or<br>(ii) with a peak throughput of 120 litres per second or more;<br>excluding where—<br>(a) such infrastructure is for bulk transportation of water or storm water or storm water drainage inside a road reserve or railway line reserve; or<br>(b) where such development will occur within an urban area. | Granger Bay to the new revetment, and additional stormwater outfalls through the revetment. |
| **15** | The development of structures in the coastal public property where the development footprint is bigger than 50 square metres, excluding—<br>(i) the development of structures within existing ports or harbours that will not increase the development footprint of the port or harbour;<br>(ii) the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;<br>(iii) the development of temporary structures within the beach zone where such structures will be removed within 6 weeks of the commencement of development and where coral or indigenous vegetation will not be cleared; or<br>(iv) activities listed in activity 14 in Listing Notice 2 of 2014, in which case that activity applies. | The proposed development will be approximately 11.76 ha, including the land reclamation of approximately 3.2 ha of land from Table Bay, which includes 0.8ha for the breakwaters. The land reclamation will be protected by a new permanent rock revetment and two breakwaters forming a new protected bay 3 ha in extent. The west breakwater will extend approximately 90 metres into Table Bay, and the east approximately 140 metres. A revetment connecting the two breakwaters will be approximately 540 metres long.<br><br>This proposed mixed-use development will be larger than 50 square meters partially within coastal public property. |
| **17** | Development –<br>(i) in the sea;<br>(ii) in an estuary;<br>(iii) within the littoral active zone;<br>(iv) in front of a development setback; or<br>(v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater;<br>in respect of—<br>(a) fixed or floating jetties and slipways;<br>(b) tidal pools;<br>(c) embankments;<br>(d) rock revetments or stabilising structures including stabilising walls; or<br>(e) infrastructure or structures with a development footprint of 50 square metres or more —<br>but excluding—<br>(aa) the development of infrastructure and structures within existing ports or harbours that will | The proposed development includes land reclamation of approximately 3.2 ha in Table Bay including coastal protection infrastructure. The land reclamation will include infrastructure of more than 50 square meters and a new permanent rock revetment.<br><br>This development will take place partially in the sea, partially within the littoral active zone and partially within a distance of 100 metres of the high water mark. |

| Listed Activity | Description | Applicability |
|---|---|---|
| | not increase the development footprint of the port or harbour;<br>(bb) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies;<br>(cc) the development of temporary infrastructure or structures where such structures will be removed within 6 weeks of the commencement of development and where coral or indigenous vegetation will not be cleared; or<br>(dd) where such development occurs within an urban area. | |
| **19A** | Infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from—<br>(i) the seashore;<br>(ii) the littoral active zone, an estuary or a distance of 100 metres inland of the highwater mark of the sea or an estuary, whichever distance is the greater; or<br>(iii) the sea;<br>but excluding where such infilling, depositing, dredging, excavation, removal or moving—<br>(f) will occur behind a development setback;<br>(g) is for maintenance purposes undertaken in accordance with a maintenance management plan;<br>(h) falls within the ambit of activity 21 in this Notice, in which case that activity applies;<br>(i) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies | The proposed development includes land reclamation of approximately 3.2 ha of land from Table Bay.<br><br>More than 5 cubic meters of material will be infilled or deposited onto the seashore, in the littoral active zone and in the sea. |
| **Listing Notice 2 (GN 325 of 2017)** | | |
| **14** | The development and related operation of—<br>(i) an anchored platform; or<br>(iii) any other structure or infrastructure —<br>on, below or along the sea bed;<br>excluding —<br>(a) development of facilities, infrastructure or structures for aquaculture purposes; or<br>(b) the development of temporary structures or infrastructure where such structures will be removed within 6 weeks of the commencement of development and where coral or indigenous vegetation will not be cleared. | The proposed development includes land reclamation of 3.2 ha from Table Bay for mixed-use development and includes the placement of a new permanent rock revetment and two breakwaters.<br><br>This reclamation and infrastructure will be on and below the seabed. |
| **23** | The reclamation of an island or parts of the sea. | The proposed development centres on the reclamation of land from Table Bay, to accommodate new coastal public amenities, including a new bay for recreational activities and new mixed-use |

| Listed Activity | Description | Applicability |
|---|---|---|
| | | development. The land reclamation will be protected by a permanent rock revetment and two breakwaters which will form a new protected bay. |
| **26** | Development—<br>(i) in the sea;<br>(ii) in an estuary;<br>(iii) within the littoral active zone;<br>(iv) in front of a development setback; or<br>(v) if no development setback exists, within a distance of 100 metres inland of the highwater mark of the sea or an estuary, whichever is the greater;<br>in respect of —<br>(a) facilities associated with the arrival and departure of vessels and the handling of cargo;<br>(b) piers;<br>(c) inter- and sub-tidal structures for entrapment of sand;<br>(d) breakwater structures;<br>(e) coastal marinas;<br>(f) coastal harbours or ports;<br>(g) tunnels; or<br>(h) underwater channels;<br>but excluding the development of structures within existing ports or harbours that will not increase the development footprint of the port or harbour. | This proposed development includes the reclamation of 3.2 ha of land from Table Bay. The land reclamation includes, and will be protected by, a new permanent rock revetment and two breakwaters forming a new protected bay 3 hectares in extent. The west breakwater will extend approximately 90 metres into Table Bay, and the east approximately 140 metres. A revetment connecting the two breakwaters will be approximately 540 metres long. |

Where activities in Listing Notice 2 are proposed, a Scoping and EIA process must be undertaken. Because an activity from Listing Notice 2 is proposed, this application will follow a Scoping and EIA process in terms of the 2014 EIA Regulations, as amended.

### 2.3.3 Competent Authority for the EA application process

Section 24C of NEMA outlines the requirements for an environmental authorisation application to be considered by the national competent authority. These requirements determine if a project has national or international significance. If none of the requirements of this section are met, then the competent authority is not the national authority. Since the proposed project does not trigger any of the requirements listed in section 24C of NEMA, the competent authority is the provincial authority: the **Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)**. In terms of legal requirements, the Scoping Report must satisfy the requirements of Appendix 2 of the amended 2017 NEMA EIA Regulations (as noted in Regulation 21 (3) of the GN R326). Table 1-2 in Chapter 1 outlines how the legislated requirements are addressed in the various chapters of this Scoping Report.

### 2.3.4 Integrated Environmental Management

Chapter 5 of NEMA establishes a suite of environmental management tools designed to ensure the integrated environmental management of activities. In accordance with this chapter, activities that have the potential to impact on— (a) the environment; (b) socio- economic conditions; and (c) the cultural heritage, need to be identified and must be considered, investigated and assessed prior to their implementation and reported to the Organ of State charged by law with authorising, permitting,

or otherwise allowing the implementation of such an activity. Due to the proposed development, including the reclamation of land from the sea, there are various factors identified in section 63 of the ICMA that need to be considered. This section states that where an environmental authorisation in terms of Chapter 5 of the National Environmental Management Act is required for coastal activities, the competent authority (in this case – DEA&DP) must take into account various specified factors over and above the standard considerations. These include consistency with the purpose of coastal public property and coastal access, socioeconomic impacts, impacts of coastal processes on the activity and vice versa, whether the activity is by its nature required to be located in the coastal environment, and whether public services will be provided by the activity.

### 2.3.5 Screening Tool Report

The Minister of Environment, Forestry and Fisheries in July 2019 gave notice that a national web-based environmental screening tool must be used in the submission of applications for environmental authorisation (GN 960 of 2019). A report generated from the screening tool is accordingly included as **Appendix B** of this Scoping Report. The outputs of this tool are further discussed in the Site Sensitivity Verification Report (**Appendix C**) and Chapter 3 of this report.

### 2.3.6 NEMA Principles

NEMA sets out principles which must inform all environmental management, including environmental assessment. The principles of environmental management in section 2 of NEMA, together with the manner in which they have been or will be taken into account, are detailed below:

**(2) Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitably.**

The need and desirability of the project are considered in Chapter 5 of this report. The project is intended to provide retail, recreational and restaurant spaces. New public amenities will include the new bay, providing sheltered waters for boating, kayaking, and swimming. Land-based amenities will include a coastal public walkway, a slipway, a fixed quayside, a landscaped promenade, tidal pools, pedestrian paths and open areas.

**(3) Development must be socially, environmentally and economically sustainable**

Social, environmental and economic sustainability of the proposed development will be assessed during the EIA phase. Chapter 3 of this report outlines the status quo, while Chapter 6 sets out the potential impacts and plan of study, respectively.

**(4) (a) Sustainable development requires the consideration of all relevant factors, including the following:**

**(i) that the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;**

As far as possible, the disturbance of ecosystems and loss of biological diversity will be avoided in the proposed development. Marine and oceanographic scoping studies were undertaken to inform the proposed development design, and the impacts on ecosystems and biological diversity will be comprehensively assessed during the EIA phase.

**(ii) that pollution and degradation of the environment are avoided, or, where they cannot be altogether avoided, are minimised and remedied;**

Potential pollution and degradation of the environment will be assessed during the EIA and minimised or remedied as far as possible. Preliminary measures to avoid, minimise and mitigate such impacts are set out in Chapter 6 of this report. The assessment phase will further refine these measures and assess the residual impacts.

**(iii) that the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimised and remedied;**

The cultural heritage resources associated with the site are described in Chapter 3 of this report. Due to the anticipated impacts on heritage resources, a Heritage Impact Assessment (HIA) in terms of section 38(8) of the National Heritage Resources Act (Act 25 of 1999) (NHRA) has been recommended in the notification of intent to develop submitted to the heritage resources authority. The HIA, inclusive of a Visual Impact Assessment (VIA) and Marine Archaeology Impact Assessment, will be published during the EIA Phase.

**(iv) that waste is avoided, or where it cannot be altogether avoided, minimised and reused or recycled where possible and otherwise disposed of in a responsible manner;**

The Environmental Management Programme (EMPr) for the proposed development and land reclamation will be compiled during the EIA process and will incorporate measures for the responsible management of waste.

**(v) that the use and exploitation of non-renewable natural resources is responsible and equitable, and takes into account the consequences of the depletion of the resource;**

The use of non-renewable resources will be further considered during the EIA process, and efficiency measures proposed where possible. The V&A Waterfront has an existing desalination plant that currently has capacity to supply up to 3.3 megalitres of potable water, and expansion to these operations will be considered to increase future potable water supply. Alternative potable water supply can reduce demand on the municipal infrastructure.

**(vi) that the development, use and exploitation of renewable resources and the ecosystems of which they are part do not exceed the level beyond which their integrity is jeopardised;**

The use and exploitation of renewable resources and ecosystems will be considered and assessed during the EIA process to confirm that their integrity is not jeopardised.

**(vii) that a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions;**

The precautionary principle of environmental management has been applied in the identification of potential impacts discussed in Chapter 6.

**(viii) that negative impacts on the environment and on people's environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied.**

The identification, assessment and mitigation of potential impacts is detailed in Chapter 6 of this report and will be further quantified during the EIA phase.

**(b) Environmental management must be integrated, acknowledging that all elements of the environment are linked and interrelated, and it must take into account the effects of decisions on all aspects of the environment and all people in the environment by pursuing the selection of the best practicable environmental option.**

The consideration of alternatives is outlined in Chapter 4, and the assessment of potential impacts to determine the best practicable environmental option will be the focus of the assessment phase of this EIA.

The need and desirability of the proposed development are outlined in Chapter 5 which includes how the socio-economic impacts resulting from the development are likely to impact on peoples' environmental rights. The potential adverse environmental impacts will be further considered and assessed during the EIA phase, at which point the distribution of adverse effects and associated environmental justice concerns will be considered.

**(d) Equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing must be pursued, and special measures may be taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination.**

The potential impacts on equitable access to environmental resources, benefits and services will be assessed during the EIA phase.

**(e) Responsibility for the environmental health and safety consequences of a policy, programme, project, product, process, service or activity exists throughout its life cycle.**

An Environmental Management Programme for both the construction and operational phases of the proposed development will ensure that responsibility for environmental health consequences vests in the appropriate persons for the duration of the development life cycle.

**(f) The participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured.**

The Scoping phase provides opportunities for participation in the environmental governance process, and further opportunities will be provided during the EIA phase. Details of the promotion of participation by all interested and affected parties are provided in the Public Participation Process Report (PPPR) submitted to DEA&DP as **Appendix I**. The Comments and Responses Report is attached as **Appendix H**.

**(g) Decisions must take into account the interests, needs and values of all interested and affected parties, and this includes recognising all forms of knowledge, including traditional and ordinary knowledge.**

A pre-application public participation process provided an opportunity for participation in the identification and assessment of environmental issues raised by all I&APs, in addition to the scientific and technical knowledge provided by specialists. Details of the public participation process are outlined in Chapter 7 of this report. There will also be an opportunity to participate and comment on the draft EIA report.

**(h) Community wellbeing and empowerment must be promoted through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means.**

The potential impacts on community wellbeing and empowerment will be included during the EIA phase.

**(i) The social, economic and environmental impacts of activities, including disadvantages and benefits, must be considered, assessed and evaluated, and decisions must be appropriate in the light of such consideration and assessment.**

The scoping-level assessment of the social, economic and environmental impacts is detailed in Chapter 6 of this report. These impacts will be further assessed and evaluated during the EIA phase.

**(j) The right of workers to refuse work that is harmful to human health or the environment and to be informed of dangers must be respected and protected.**

The Environmental Management Programme to be developed for the proposed development during the EIA phase will incorporate measures as applicable.

**(k) Decisions must be taken in an open and transparent manner, and access to information must be provided in accordance with the law.**

Public engagement and access to the draft Scoping Report and future revisions will be provided via various methods outlined in Chapter 7.

**(l) There must be intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment.**

The national, provincial, and local policy contexts are outlined in Chapter 2 of this report. Consultation with Organs of State will form part of the public participation process, and is further detailed in Chapter 7 of this Scoping Report.

**(m) Actual or potential conflicts of interest between organs of state should be resolved through conflict resolution procedures.**

The consultation with authorities that forms part of the public participation process is anticipated to enable conflict resolution.

**(n) Global and international responsibilities relating to the environment must be discharged in the national interest.**

Global and international responsibilities are given effect in South African law regarding biodiversity and environmental management, which is the basis on which this Scoping Report and EIA are conducted.

**(o) The environment is held in public trust for the people, the beneficial use of environmental resources must serve the public interest, and the environment must be protected as the people's**

The need and desirability of the proposed development are described in Chapter 5 of this report, and the competent authority's role in the EIA is to consider the public interest in deciding on the application.

**(p) The costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects must be paid for by those responsible for harming the environment.**

An Environmental Management Programme for both the construction and operational phases of the proposed development will ensure that responsibility for environmental consequences vests in the appropriate persons for the duration of the development life cycle.

**(q) The vital role of women and youth in environmental management and development must be recognised, and their full participation therein must be promoted.**

This Scoping and EIA process provides opportunities for participation in the identification and assessment of environmental issues by all I&APs, including women and youth. Details of the promotion of participation by all interested and affected parties are provided in Chapter 7.

**(r) Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems, require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.**

Sensitive ecosystems relevant to the proposed development include the coastal shores from which land reclamation is proposed. Marine, oceanographic and climate change specialists have been appointed to assess the anticipated impacts of the proposed development on the coastal ecosystem and coastal processes. During the EIA phase, the Environmental Management

Programme will include specific management measures applicable to the ecosystems and species identified by the specialists to be at risk as a result of the proposed development.

### 2.3.7 Previous Environmental Authorisation in terms of NEMA

An Environmental Authorisation was granted in 2018 to the V&A Waterfront by the Department of Environmental Affairs and Development Planning for the development of a dolos revetment, reclamation of land in the sea and associated mixed-use development on Erf 173712, Granger Bay Precinct, V&A Waterfront, Cape Town (reference 16/3/1/2/A7/4/3058/12, dated 13 April 2018).

The proposed development (as per the applicant's preferred alternative) consisted of two main components:

- Mixed-use (primarily residential with some retail and commercial use) development of Erf 173712, portion of Erf 149294, Cape Town (also referred to as the Granger Bay precinct, located in the V&A Waterfront).
- Construction of a permanent dolos revetment and associated land reclamation.

The development and expansion of the dolos revetment and reclamation of land in the sea entailed the following, shown in Figure 2-1.

The existing temporary rock revetment was to be upgraded and replaced with a permanent dolos revetment extending approximately 310 metres from the existing dolos revetment (which ends at the Breakwater Boulevard) in a straight line across Granger Bay towards the existing embankment, which marks the coastal edge of Granger Bay. The existing embankment in front of the Grand Café & Beach Restaurant was to be replaced with rock revetment extending approximately 160m. About 2.4 hectares of land in the sea were to be reclaimed, requiring an estimated 189 340m³ of fill material.

A coastal sea park and associated infrastructure were to be developed and provide continuous public access from Beach Road to and along the coast for approximately 750m, of which about 300m would be within the Granger Bay Precinct. This included extending the existing coastal walkway along the reclaimed land and associated public amenities.

Access for private vehicles was to be gained from Beach Road and Granger Bay Boulevard Extension. The existing Haul Road was to be demolished and replaced by a link between Granger Bay Boulevard Extension and Breakwater Boulevard. This link road was to be developed over a portion of the reclaimed land, providing access to the development.

The 2018 Scheme has not been implemented, and the V&A Waterfront has instead proposed a new design for this area, which is the subject of the current application and this Scoping Report. The new proposal (described below) provides for a greater degree of public coastal access and infrastructure.

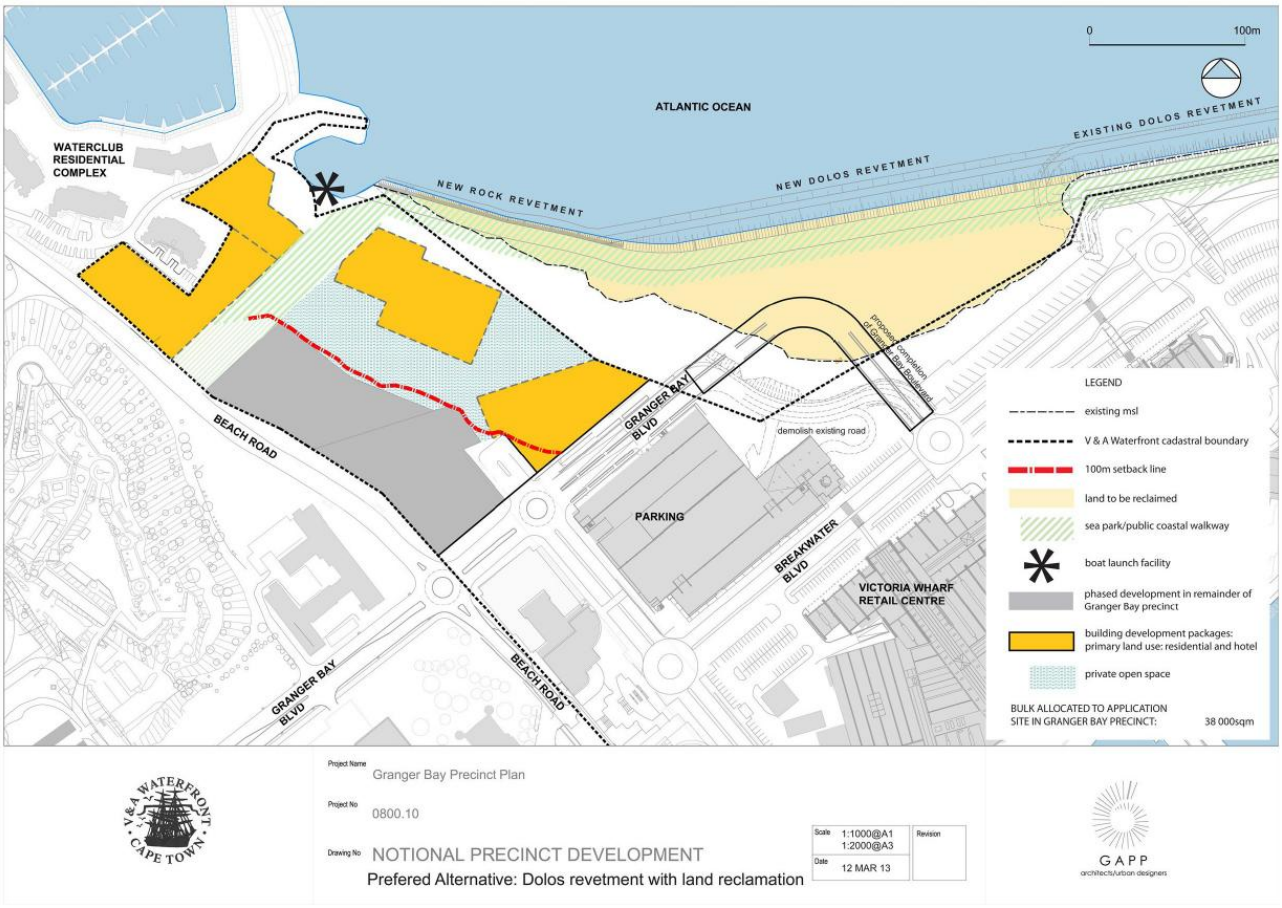



**Figure 2-1: Concept design of the 2018 proposed mixed-use development of erf 173712, Cape Town, Granger Bay Precinct and associated sea defence works, V&A Waterfront, Cape Town**

## 2.4 National Environmental Management: Integrated Coastal Management Act (Act 24 of 2008)

The National Environmental Management: Integrated Coastal Management Act (Act 24 of 2008) aims to establish a system of integrated coastal and estuarine management in South Africa, including norms, standards and policies, in order to promote the conservation of the coastal environment, and maintain the natural attributes of coastal landscapes and seascapes, and to ensure that development and the use of natural resources within the coastal zone is socially and economically justifiable and ecologically sustainable. The ICMA also seeks to control inappropriate development of the coastal environment and other adverse effects on the coastal environment to give effect to South Africa's international obligations in relation to coastal matters and to provide for matters connected therewith.

The proposed development includes the reclamation of land from the sea; therefore, section 7C of the ICMA, which addresses the reclamation of land for purposes other than state infrastructure, is applicable. According to section 7C of the ICMA:

> (1) An application for reclamation for purposes other than the development of state infrastructure as contemplated in section 7B will only be considered in exceptional circumstances which are not contrary to the purpose of coastal public property as set out in section 7A.

(2) An application for reclamation in terms of this section must be accompanied by –
(a) details of how the land will be developed and its use;
(b) an assessment of whether there is any alternative land available and why such land cannot be used;
(c) information on whether the land and structures will be accessible to the public;
(d) information on whether the development is in the interests of the whole community;
(e) detailed information on how the development will be funded; and
(f) any other relevant information.

The draft Socio-Economic Impact Assessment (Appendix D3) discusses how the proposed development aligns with the ICMA. The proposed development has high socio-economic potential due to the location of the site in close proximity to the City centre, various tourist attractions and the coast. Some of the specific sections of the ICMA and how they align with the proposal are listed below:

- **Section 2 refers to the objectives of integrated coastal management:** The project is expected to support economic development by contributing to job creation, tourism growth, and access to coastal opportunities while simultaneously incorporating environmental considerations as demonstrated by the consultation with various marine specialists (see Appendix D1 – D3).
- **Section 13 refers to the protection of coastal public property:** Public access to coastal areas is a key design consideration of the proposed development. The proposal includes the construction of a sheltered bay to be used recreationally with pools, beach area and walkways enhancing the accessibility and inclusivity of the development.
- **Section 56 refers to environmental authorisation:** The project is subject to a Scoping and Environmental Impact Assessment process, ensuring the identification and mitigation of impacts on coastal resources and ecosystem services that support the local communities and the regional economy. The identification of potential impacts and mitigation measures are to be included in the impact assessments complied by various specialists – the draft versions of these can be found in Appendix D1 – D3.
- **Section 58 refers to the promotion of socio-economic development:** The proposed development is expected to facilitate employment, support local businesses, and enhance the economic value of the V&A Waterfront precinct. The potential improvement of the socio-economic conditions through sustainable coastal use aligns with the objectives of the ICMA.

The proposed development has high socio-economic potential in terms of increased public access to the coast, tourism, and associated economic return which supports the local and regional economy. The intention of the proposal is to construct an environmentally responsible development that aligns with the principles of the ICMA as well as other environmental legislation and policy, as discussed throughout this chapter, while also maximising the potential positive socio-economic benefits.

Section 1.11 in Chapter 1 outlines the alignment of the application for the Minister's pre-approval in terms of section 7C of ICMA with this Scoping and EIA.

### 2.4.1 Purpose of Coastal Public Property

Section 7A of the ICMA sets out the purpose of coastal public property, a relevant consideration in the decisions of the Minister in respect of the reclamation application, as well as the DEA&DP in respect of the application for environmental authorisation. The proposed development has therefore

been considered against each of the objectives in Section 7A(a)–(d), as set out below. Section 7A states that the purposes of coastal public property are to:

(a) improve public access to the seashore;
(b) protect sensitive coastal ecosystems;
(c) secure the natural functioning of dynamic coastal processes;
(d) protect people, property and economic activities from risks arising from dynamic coastal processes, including the risk of sealevel rise; and
(e) facilitate the achievement of any of the objects of the Act.

**Section 7A(a): To improve public access to the seashore**

The proposed development has been designed to maintain and enhance public access to the coastline. The layout includes publicly accessible promenades, walkways and recreational coastal facilities that provide continuous, safe and lawful access to the coastal edge. Although the V&A Waterfront company is a private entity, it has created a significantly enhanced public environment which includes 5km of public access to the water's edge – an improvement on the situation prior to development, in which this area was inaccessible for the public. The Granger Bay Precinct is the final portion of the V&A Waterfront Holdings owned property that is still largely undeveloped. As a result, this portion of the city is poorly connected from the development at the V&A Waterfront and the rest of Green Point. Parking areas and vacant sites do not enhance access to the coast and public usage. The project, of which the reclamation areas form an integral part, will provide significantly improved access for the Green Point /V&A Waterfront /CBD pedestrian network through a series of public walkways and public spaces. No restriction of public access to coastal public property is proposed, and access arrangements will be managed to comply with Section 13 of the ICMA. The proposal therefore supports access to coastal public property, consistent with Section 7A(a).

**Section 7A(b): To protect sensitive coastal ecosystems**

The proposal is subject to a full Scoping and Environmental Impact Assessment process in terms of NEMA, including specialist studies addressing marine ecology, coastal processes and biodiversity (Appendices D1–D3). The findings of these studies will inform the final design and management measures to avoid, minimise or mitigate impacts on coastal and marine systems, thereby protecting the natural environment of coastal public property.

**Section 7A(c): To secure the natural functioning of dynamic coastal processes**

Specialist coastal process and marine studies form part of the EIA process and assess the potential effects of the proposed reclamation on wave climate, sediment transport and coastal hydrodynamics. The design of the reclamation and associated coastal protection measures are informed by these studies to ensure that the natural functioning of dynamic coastal processes is not compromised.

**Section 7A(d): To protect people, property and economic activities from risks arising from dynamic coastal processes, including the risk of sea level rise**

The proposed development incorporates consideration of long-term coastal risks, including sea level rise, storm surge and coastal erosion. The design is informed by coastal engineering assessments to ensure that the development does not increase risk to people, property or economic activities, and contributes to improved resilience of the surrounding coastal environment. As a replacement for the existing unprotected embankment and gravel beach, a permanent rock revetment and two breakwaters will be established to ensure shoreline protection, as well as providing shelter for portions of the site from storm action. These improvements are necessary as the existing gravel beach and

unprotected embankment are not adequate to provide the necessary shore protection for long-term development and infrastructure development of the site, as well as protection of some existing buildings. The proposed breakwaters will address these issues by making the coastline more resilient to extreme weather conditions.

**Section 7A(e): To facilitate the achievement of any of the objects of the Act**

The proposed development seeks to support the broader objects of the ICMA by balancing socio-economic development with environmental , promoting sustainable use of the coastal zone, and ensuring that development within coastal public property is subject to appropriate planning, assessment and regulatory oversight.

This alignment will be further assessed and refined through the EIA process, and through the Minister's consideration of pre-approval in terms of Section 7C.

## 2.5 Marine Living Resources Act (Act 18 of 1998, as amended)

The Marine Living Resources Act 18 of 1998 provides for the conservation of the marine ecosystem, the long-term sustainable utilisation of marine living resources and the orderly access to exploitation, utilisation and protection of certain marine living resources; and for these purposes to provide for the exercise of control over marine living resources in a fair and equitable manner to the benefit of all the citizens of South Africa. This Act also deals with compliance with international law and agreements. The Act was amended in 2014 (Marine Living Resources Amendment Act 5 of 2014, commencement date 8 March 2016).

The proposed site does not lie in a Marine Protected Area, but of relevance to the proposed development is the location of, and regulations associated with, the West Coast Rock Lobster sanctuary ("Closed Area"), which was declared under section 77 of the MLRA. This declaration means that fishing for rock lobsters is prohibited in the area between Table Bay and Llandudno (Table Bay Sanctuary), including the proposed site and land to be reclaimed. The potential impact of the development on these lobsters and the associated recommended mitigation measures are outlined in the draft Marine Impact Assessment report and Chapter 6.

According to this Act, no whales or dolphins may be harassed, killed or fished. In the Regulations for the Management of Boat-Based Whale Watching and Protection of Turtles as part of the Marine Living Resources Act of 1998, the definition of "harassment" is given as "behaviour or conduct that threatens, disturbs or torments cetaceans". The impacts on cetaceans are assessed by a Marine Mammal specialist, and the findings will be incorporated into the EIA and EMPr.

## 2.6 Marine Spatial Planning Act (Act 16 of 2018)

The Act is built on the National Framework for Marine Spatial Planning (MSP) in South Africa (2017), which provides guidance on MSP on a national level. The objectives of the Marine Spatial Planning Act (Act 16 of 2018) include the development and implementation of a shared marine spatial planning system to manage a changing environment that can be accessed by all sectors and users of the ocean, the conservation of the ocean for present and future generation and the facilitation of responsible use of the ocean. Where there is a conflict between existing uses, developing uses or activities, maximum coexistence of uses or activities should be preferred wherever possible, but where such coexistence is not possible, the principles in section 5(1) must be applied to resolve such conflict, i.e., a precautionary approach must be applied. The principles and their applicability to the proposed development are listed below.

**(a) the sustainable use, growth and management of the ocean and its resources;**
Various specialists have been and will be consulted throughout the Scoping and EIA process to ensure minimal negative impacts on the ocean environment and its resources, and that the development and associated activities prioritise sustainable use of the ocean and its resources.

**(b) the identification of economic opportunities which contribute to the development of the ocean economy;**
The proposed development directly aligns with this principle as the creation of a coastal sea park area and mixed-use along the coastline is expected to increase tourism and contribute to the ocean economy.

**(c) the promotion of collaboration and responsible use of the ocean through consultation and cooperation;**
Responsible use of the ocean in relation to the proposed development is to be ensured through consultation with Marine and Oceanographic Specialists and their collaborative compilation of impact assessments. Additionally, the input from the relevant Organs of State, conservation bodies and public through the public participation process will promote responsible use of the ocean environment. The mitigation measures and recommendations from the specialists and Organs of State are to be implemented and monitored, which will be described in the EIA phase with the compilation of an EMPr.

**(d) the advancement of an ecosystem and earth system approach to ocean management which focuses on maintaining ecosystem structure and functioning within a marine area;**
The impact of the proposed development on the marine ecosystem structure and functioning will be assessed in the Marine and Oceanographic Impact Assessments, which will include various mitigation measures and recommendations to protect, maintain or enhance the functionality of the surrounding marine area.

**(e) adaptive management which takes into account the dynamics of the ecosystems and the evolution of knowledge and of activities in South African waters;**
The dynamics of the surrounding marine environment have been considered in the draft Oceanographic Impact Assessment and Marine Impact Assessment. These will be updated and revised during the Scoping and EIA phase to be finalised for the final EIA submission. The adaptive management of the surrounding marine ecosystem, in terms of preventing, minimising and remediating negative impacts, will be achieved through the compilation and implementation of an Environmental Management Programme during the EIA phase, which is a living document, to be updated throughout the construction of the proposed development, should it be authorised.

**(f) the principle of spatial resilience and flexibility;**
Spatial resilience and flexibility associated with the proposed development includes the predicted improved coastal resilience and protection from consequences of climate change (storm surges, sea level rise and associated coastal erosion). A Climate Change Impact Assessment – which will form part of the upcoming EIA phase - will provide further insight into the resilience of the proposed development relative to anticipated consequences of climate change, and guide design adaptations where required.

**(g) the promotion of equity between and transformation of sectors;**
The proposed private development promotes improved public use of the site by increasing accessibility to the coast (i.e. the proposed public coastal sea park and walkway).

**(h) the reliance on the best available scientific information;**

Various specialists with the relevant and appropriate qualifications have and will be consulted during the Scoping and EIA process. Their assessments include reviews of existing literature and research combined with their own site investigations and data gathering, ensuring that their recommendations are based on the best available scientific information. These studies are also updated throughout the Scoping and EIA process to address concerns raised by the public and decision-makers.

**(i) the equitable resolution of conflict scenarios, including the implementation of trade-offs, relocations and other available resolutions;**

Although the proposed development will have some negative impacts on the marine environment, the socio-economic benefits of the proposal are expected to be abundant. The implementable recommendations and mitigation measures to be determined by the specialists in the final Impact Assessments will be combined and used to minimise negative impacts and resolve conflicting scenarios.

**(j) the principle of efficiency, whereby decision-making procedures are designed to minimise negative financial, social, economic or environmental impacts;**

These impacts will be assessed and negative impacts identified with their associated recommended mitigation measures included in the specialists' reports and Impact Assessment Chapter in the EIA.

**(k) the principle of good administration coherent and holistic planning and management;**

Various planning frameworks and environmental management guidelines will be considered, and the input from various stakeholders, Organs of State and the public will be incorporated into the Scoping and EIA process.

**(l) South Africa's international obligations and cross-border cooperation.**

These include the following principles, applicable under South Africa's jurisdiction, and relevant to the proposed development:

- The sustainable use of marine resources,
- Maintaining marine biodiversity,
- Undertake research and monitoring,
- Sustainable development, and to
- Address pollution of the ocean from land, sea and air.

Building on the Marine Spatial Planning Act (Act No. 16 of 2018) and the National Framework for Marine Spatial Planning in South Africa, the Department of Forestry, Fisheries and the Environment (DFFE) published The Approach to Spatial Management System for South Africa's Marine Planning Areas in 2019. The document translates the overarching vision and high-level directions for developing South Africa's ocean space into a spatial management system that applies to all Marine Planning Areas. The Marine Planning Areas encompass the area between the high-water mark (landmass boundary line) and the exclusive economic zone as seaward boundary. South Africa's marine space is divided into four smaller bio-geographic areas, and the proposed site falls within the Western Marine Planning area, therefore the four goals outlined in this document should be considered in relation to the proposed development. These goals include 1) Unlocking the ocean economy, 2) Engaging with the ocean, 3) Ensuring healthy marine ecosystems and 4) Contributing to good ocean governance. The 2022 National Coastal and Marine Spatial Biodiversity Plan, associated CBA Map and sea-use guidelines provide the basis for the biodiversity sector's input into

the multi-sectoral MSP process that is undertaken according to the Marine Spatial Planning Act. The plan provides input into environmental impact assessments, integrated coastal management, restoration initiatives and formal protection of the ocean. The draft Biodiversity Sector Plan aims to specify the overall national spatial development objectives and priorities of the sector for the coming two decades. It specifies the spatial requirements of the sector for South Africa's mainland EEZ marine area. Including proposed biodiversity zones and their spatial regulations.

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

The National Environmental Management: Biodiversity Act 10 of 2004 (NEM: BA) provides for the management and conservation of South Africa's biodiversity within the framework of the National Environmental Management Act, 1998; the protection of species and ecosystems that warrant protection; the fair and equitable sharing of benefits arising from bioprospecting involving indigenous biological resources; the establishment and functions of a South African National Biodiversity Institute; and for matters connected therewith. The NEM:BA includes management and control measures for alien and invasive species and provides for the protection of threatened or protected ecosystems and species. Regulations have been published in terms of section 97(1) of the NEM:BA, which are applicable to the proposed development. These include the NEM:BA Alien and Invasive Species Regulations and the Threatened or Protected Marine Species Regulations as described below.

### 2.7.1 The NEM:BA Alien and Invasive Species Regulations (2014)

The National Environmental Management: Biodiversity Act Alien and Invasive Species Regulations aim to restrict the spread of listed invasive species through transfer, release, discharging or disposing in waterways or oceans, catch and release, introduction to offshore islands, and release into a discrete catchment system. It requires that a risk assessment be carried out for listed species to ascertain the likelihood of naturalisation and vector pathways. The draft Marine Impact Assessment (**Appendix D2**) lists the potential alien and invasive species that could be found in the site area. These include ascidians (sea squirts), anemones, bryozoans, a sponge, segmented worms, crustaceans (amphipods, crabs, and barnacles), and molluscs (mussels, nudibranch, and a gastropod). The control of marine invasive species is not the direct responsibility of coastal landowners.

### 2.7.2 The NEM:BA Threatened or Protected Species Regulations (2007)

The National Environmental Management: Biodiversity Act Threatened or Protected Species Regulations provides a national approach to sustainable use of species that were threatened with extinction, or in need of national protection, while ensuring the survival of the species in the wild, thus ensuring the conservation of the species. NEM: BA enables the Minister to prohibit activities that may impact the survival of species in the wild, and to regulate activities to ensure sustainable use of indigenous biological resources. There are likely to be threatened or protected species present in the site area, including the Near Threatened Heaviside dolphin identified in the draft Marine Impact Assessment (**Appendix D2**), which recommends some initial mitigation measures to reduce the anticipated impact on marine mammals, including the Heaviside dolphins. All of the appropriate management and mitigation measures will be further identified in the final Marine Impact Assessment, to also be included in the EIA report and EMPr.

In term of these regulations, no person may carry out a restricted activity (which includes "harassment", defined as behaviour or conduct that "threatens, disturbs or torments a live specimen of a listed threatened or protected marine species, and includes— … (b) in the case of a whale, approaching a whale with a vessel or aircraft closer than 300 metres…") unless the Minister has exempted him/her from carrying out of such restricted activity in terms of section 57(4) of the Act. As

such, no vessel or aircraft may approach closer than 300 m to any whale, and a vessel should move to a minimum distance of 300 m from any whale if a whale surfaces closer than 300 m from a vessel or aircraft.

Three species of whale and three species of dolphin are known to occur in Table Bay at various times of the year, all of which may come within a few km of, or into, Granger Bay. In Table Bay and the rest of the West Coast, the large baleen whales are typically more prevalent in spring and summer months, in contrast to the standard paradigm of winter presence that is typical of the 'South Coast' of South Africa (i.e., east of Cape Point, especially areas like Hermanus and De Hoop).

The presence of endangered seabird colonies was a factor supporting the recent (2019) proclamation of the Robben Island MPA that protects breeding and feeding areas for these endangered seabirds. The waters around Robben Island and Mouille Point are prime areas for viewing seabirds, including penguins, cormorants, and oystercatchers. Although there is no overlap with any of the proposed infrastructure with any MPAs, the site is in close proximity to the Robben Island MPA. The proclamation of this MPA was also aimed at facilitating species management and supporting stock recovery of over-exploited species such as West Coast rock lobster *Jasus lalandi* and abalone *Haliotis midae* stocks. The entirety of Table Bay falls within a rock lobster sanctuary, and no West Coast rock lobster (*J. lalandi*) may be caught, either recreationally or commercially. The relevant regulations state "(13) No person shall, in any manner or for any purpose, engage in fishing, collecting or disturbing west coast rock lobster within…The area within 12 nautical miles seaward of the high-water mark between, as northern limit, a line (270° true bearing) drawn through a beacon marked MB1 and situated at Melkbos Point, and as southern limit, a line (270° true bearing) drawn from a beacon marked HD1 at "Die Josie" situated near Chapman's Peak south of Hout Bay" (Figure 3-11).

### 2.7.3 Biodiversity Management Plan for the African Penguin (2013)

The Biodiversity Management Plan for the African Penguin was developed and gazetted in terms of section 43 of NEM:BA, as the African Penguin is listed as "Protected" in terms of section 56 of NEM: BA. One of this plan's objectives is to "minimise and/or mitigate the impact of catastrophic events and other key pressures and risks on African Penguins". Another objective is to "minimise the impact of pollution (oil, hazardous and noxious substances) on African Penguins through preventing spills, ensuring adequate preparedness, appropriate response and monitoring success." The plan provides for actions which should take place to achieve these objectives. This species is widespread along the coast of southern Africa, including the waters around Robben Island and Mouille Point; therefore, this plan and its objectives need to be considered in the EIA process.

In March 2025, a court settlement was reached between the Southern African Foundation for the Conservation of Coastal Birds (SANCCOB), BirdLife South Africa, and the Minister of the Department of Forestry, Fisheries and the Environment, which established fishing exclusion zones around key penguin breeding colonies to protect their feeding areas. This agreement followed litigation initiated by BirdLife South Africa and SANCCOB, which addressed the decline of African penguin populations. The settlement includes the closure of specific fishing areas around six key breeding colonies, including Dassen Island, Stony Point, Dyer Island, St Croix Island, Bird Island and Robben Island (located less than 10 km from the site). The agreement ensures that the fishing industry can continue to operate, with restrictions in areas crucial for penguin foraging.

## 2.8 Sea Birds and Seals Protection Act (Act 46 of 1973)

This Act provides for the protection of, and control of the capture and killing of, seabirds and seals. The Benguela Ecoregion, which includes the proposed site, supports a variety of seabirds including penguins, gannets, cormorants and oyster catchers (among others). Robben Island (<10km away from the site) has numerous seabird species, including the regionally Endangered and globally Critically Endangered African Penguin (*Spheniscus demersus*) (Hagen, 2025), Endangered bank cormorant (*Phalacrocoraz neglectus*) (Shaw and Crawford, 2025) and Endangered Cape cormorant (*Phalacrocoraz coronatus*) (McInnes et al., 2025).

According to GN 401 of 2004 Sea Birds and Seals Protection Act, 1973 (Act No. 46 of 1973), Draft Policy for Seals, Seabirds and Shorebirds in South Africa: "*Some species of seabird, e.g. Hartlaub's Gull, have learnt to nest on the roofs of buildings or to build nests on private property (e.g. gardens), often causing damage to buildings (e.g. by blocking gutters) or irritation to residents (e.g. through noise). Policy will aim to discourage such nesting where possible, e.g. through exclusion fencing, laser technology and/or provision of alternative safe breeding sites, and where desired it will allow for the removal of nests and the captive rearing of affected eggs and chicks. However, such removal of nests will not be considered if it is likely adversely to affect the conservation status of the species concerned. Any discouragement or intervention (including the artificial rearing of eggs and chicks) will be at the expense of the landowner concerned.*"

The relevant guidelines and recommendations in the Sea Birds and Seals Protection Act and draft Policy for Seals, Seabirds and Shorebirds in South Africa should be considered in design and construction planning for the proposed development.

## 2.9 National Environmental Management: Waste Act (Act 59 of 2008)

The National Environmental Management: Waste Act (NEMWA) aims to protect health and the environment by providing reasonable measures for the prevention of pollution and ecological degradation. This Act provides national norms and standards for regulating the management of waste and stipulates specific waste management measures. The NEMWA also provides for the licensing and control of waste management activities, compliance and enforcement, for the national waste information system, and to provide for matters connected therewith.

The list of waste management activities that have, or are likely to have, a detrimental effect on the environment (GN 921 of 2013) includes the different categories of waste management activities, as well as an indication of whether an Environmental Authorisation is required for that category, and what level of assessment is required (Basic Assessment or Scoping and EIA). It is likely that the type of waste management activity associated with the proposed development will be classified as Category C. This means that the relevant requirements or standards as outlined in section 5 of GN 921 of 2013 may be applicable.

Activities relating to the storage of waste applicable to Category C are:

(1) The storage of general waste at a facility that has the capacity to store in excess of 100m³ of general waste at any one time, excluding the storage of waste in lagoons or temporary storage of such waste.

(2) The storage of hazardous waste at a facility that has the capacity to store in excess of 80m³ of hazardous waste at any one time, excluding the storage of hazardous waste in lagoons or temporary storage of such waste.

(3) The storage of waste tyres in a storage area exceeding 500m².

Activities relating to the handling of waste applicable to Category C are:

(4) The scrapping or recovery of motor vehicles at a facility that has an operational area in excess of 500m$^2$.

(5) The extraction, recovery or flaring of landfill gas.

(6) The sorting, shredding, grinding, crushing, screening or baling of general waste at a waste facility that has an operational area that is 1000m$^2$ and more.

(7) The treatment of organic waste using composting and any other organic waste treatment.

Should any of the above waste storage activities be proposed, the Norms and Standards for Storage of Waste, published under Government Notice R.926 in Government Gazette 37088 of 29 November 2013, will apply to the project. Should any of the above waste handling activities be proposed, the Norms and Standards for the Sorting, Shredding, Crushing, Screening or Bailing of General Waste, published under Government Notice No. 1094 in Government Gazette 41175 of 11 October 2017, will be applicable.

## 2.10 National Heritage Resources Act (Act 25 of 1999)

The National Heritage Resources Act (NHRA) is the controlling legal framework for heritage management in South Africa. The Act lays down general principles for governing heritage resources management throughout the republic and provides for the identification, assessment, and management of the heritage resources of the country.

Where development will include activities identified in terms of the National Heritage Resources Act, 1999 (NHRA), as listed in the below table, the applicant is required to notify the responsible authority, which in this case is both Heritage Western Cape (HWC) and the South African Heritage Resources Authority (SAHRA), of the intent to develop and furnish it with details regarding the location, nature and extent of the proposed development.

| | |
|---|---|
| **S38(1)(a)** | Construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier over 300m in length. |
| **S38(1)(c)** | Any development or activity that will change the character of a site: (i) exceeding 5 000m$^2$ in extent; (ii) involving three or more existing erven or subdivisions thereof. |

A Notification of Intent to Develop (NID) has been submitted on 12 June 2025 to HWC by the appointed heritage practitioner (see Appendix E1). This Scoping Report and NID will be circulated to SAHRA and HWC for their comment during the public participation process on the Draft Scoping Report. The HIA (inclusive of the VIA and Marine Archaeology Impact Assessment) will be circulated during the public participation process for the EIA Report.

Due to its coastal location, the site has potential maritime archaeological significance related to possible shipwrecks. The NHRA protects all archaeological artefacts and sites in South Africa, including maritime artefacts. This includes any shipwreck, any submerged aircraft wreckage, prehistoric landscape, sacred site, shipwreck survivor camp, or rock art site relating to maritime or underwater cultural heritage, which is older than 60 years. Any other archaeological material associated with these sites is also protected by the Act. Maritime and underwater cultural heritage sites or material may not be disturbed unless a permit has been issued by the South African Heritage Resources Agency. Maritime archaeology will be assessed as part of the HIA to be undertaken for the EIA process.

There are existing HWC approvals for the V&A Waterfront in place, which are either of direct or contextual relevance for the project site – these include those in Table 2-2.

**Table 2-2: Heritage Western Cape Approvals applicable to this proposed development**

| Heritage Western Cape Approvals for the V&A Waterfront | Description of Approval |
|---|---|
| **Beach Road Precinct Plan and Arc of Fire** | A Phase One HIA for the Beach Road Precinct was compiled in 2008. The subsequent HIA was subject to an Appeals process and a hearing at an HWC Tribunal. The Record of Decision (RoD), which resulted from the Tribunal, established the approved sight lines from Fort Wynyard related to the arc of fire. These sight lines, approved by HWC in the RoD dated 22 June 2011, and the primary heritage indicators, pertain to the Granger Bay Precinct.<br><br>This decision preserves view arcs across Granger Bay. Within the view arc, no buildings will be higher than 21,5m or approximately 5 floors. Outside the view arc, towards the Beach Road/ Granger Bay Boulevard Extension corner, building heights may be 10 or 16 floors. |
| **Granger Bay Precinct Plan 2014 & as amended 2019** | The Granger Bay Precinct Plan was approved in January 2014 by the CCT. This was amended in the 2019 approved Granger Bay land reclamation and will be detailed further in the draft Heritage Impact Assessment. |
| **HIA for entire V&AW which formed part of the rezoning application, 2024** | A section 38(4) HIA application was approved on 28 October 2024 for the entire V&A Waterfront for additional bulk rights and rezoning of the site to Mixed Use 3(MU3). The approval included the identification and endorsement of heritage significance and indicators. The endorsement relates to most of the parcels in the study area. |

## 2.11 Legal Succession to the South African Transport Services Act (SATS), 1989 (Act 9 of 1989)

This Act was established to make provision for the formation of a company, for the legal succession to the South African Transport Services by the Company, for the establishment of the South African Rail Commuter Corporation Limited and for related matters. Historically, the special zoning of the site and V&A Waterfront as a Development Zone was allocated in terms of this Act. The Act transformed the South African Transport Services into a public company, and the V&A Waterfront land, which was previously owned by Transnet and its predecessor, SA Railways & Harbours. The Act enabled the City of Cape Town and the then landowner, Transnet, to reach an agreement on development rights for the V&A Waterfront. This agreement acknowledged from the outset that the V&A Waterfront property of ±80ha would be developed over the long term and that market demand would be a factor in the landowner exercising development rights.

## 2.12 Provincial Noise Control Regulations (PN 200 of 2013)

Construction-related activities associated with the proposed development must abide by the Provincial Noise Control Regulations, PN 200/2013 in terms of the Environment Conservation Act, 1989. Noise mitigation measures will be included in the Environmental Management Programme.

## 2.13 Spatial Planning and Land Use Management Act (Act 16 of 2013)

The Spatial Planning and Land Use Management Act, 2013 (SPLUMA) is a framework Act for all spatial planning and land use management legislation in South Africa. It seeks to promote consistency and uniformity in procedures and decision-making. Other objectives include addressing historical spatial imbalances and the integration of the principles of sustainable development into land use and

planning regulatory tools and legislative instruments. The proposed development and expansion of the V&A Waterfront should align with the SPLUMA development principles:

(a) The principle of **spatial justice,** which includes the need to redress past spatial and other development imbalances through improved access and land use.
(b) The principle of **spatial sustainability,** which upholds the consistency of land use measures in accordance with environmental management instruments and promotes land development in locations that are sustainable and limit urban sprawl.
(c) The principle of **efficiency** whereby land development optimises the use of existing resources and infrastructure, and the negative financial, social, economic or environmental impacts are minimised.
(d) The principle of **spatial resilience,** which recognises the need for accommodating flexibility in spatial plans, policies and land use management systems, ensuring sustainable livelihoods.
(e) The principle of **good administration** recognises the preparation and amendment of spatial plans, policies and land use schemes as well as procedures for development applications, which include transparent processes of public participation that affords all parties the opportunity to provide inputs on matters affecting them.

The V&A Waterfront site is located in the planning jurisdiction of the City of Cape Town and that of the Western Cape provincial government. The location is strategically important in national, provincial and metropolitan planning and policy documents, and the site must be considered within the larger context of the metropolitan, provincial and national policy and planning frameworks. The applicable policy and framework documents relevant to the proposed development are described below.

## 2.14 Municipal by-laws

The by-laws of the City of Cape Town relevant to the proposed development are listed below:

» **Municipal Planning By-law,** 2015, as amended, which regulates land use and zoning. The site is zoned for Transport Use (Erf 177853: TR1) with an overlay zoning for **Development Zone** (Erf 173712 and Erf 158570-RE: Transport 1). The Development Zone is a special zoning allocated to the V&A Waterfront in terms of the Legal Succession to the South African Transport Services Act (SATS), 1989 (Act 9 of 1989). Section 17 of the MPBL refers to the land subject to the provisions of section 13 of the Legal Succession of the South African Transport Services Act, 1989 (Act 9 of 1989).
  - "(1) All land subject to section 13 of the Legal Succession of the South African Transport Services Act, 1989 (Act 9 of 1989) is deemed to be zoned Transport Zoning 1: Transport Use (TR1).
  - (2) Where an agreement has been entered into between the City and the South African Transport Services or any of its divisions or its successors in title in terms of the Legal Succession of the South African Transport Services Act, 1989 (Act 9 of 1989) or preceding legislation, the provisions and conditions contained within such agreement shall prevail over the provisions of the TR1 zoning.
  - (3) The conditions contained in an agreement referred to in sub-item (2) are deemed to be **development rules**.
  - (4) If these development rules are to be altered, this must be done by means of a departure in terms of this By-Law.
  - (5) Where additional land use rights are applied for, this must be done by means of rezoning in terms of this By-Law."

**At the time of writing this report, Erf 173712 and Erf 158570-re formed part of a rezoning application to Mixed Use (MU3), which was approved on 1 December 2025 with CoCT reference 1500109534. More information on the new zoning approval and changes to the land-use planning context will be provided in the upcoming EIA report.**

- **Stormwater Management By-law,** 2005, which regulates stormwater management in the City of Cape Town and activities which may have a detrimental effect on the development, operation or maintenance of the stormwater system.
- **Environmental Health By-law,** 2003, as amended, is intended to protect and promote public health by managing and regulating activities that could impact public health, including health nuisances, medical waste, and trades, including accommodation establishments.
- **Coastal By-law,** 2020, provides for the management and protection of the coastal zone, the natural environment of the coastal zone, and managing public access to the coastal zone and beach areas.
- **Integrated Waste Management By-law,** 2009, as amended, which regulates the avoidance, minimisation, generation, collection, cleaning and disposal of waste.
- **Recreational Water-use By-law,** 2018, regulates the use and control of recreational water within the jurisdiction of the City of Cape Town to control the vessels thereon, and to provide for safe and environmentally sensitive recreation.
- **Streets, Public Places and Prevention of Noise Nuisances By-law,** 2007, as amended, to provide effective administration of matters relating to the control of public nuisances, municipal roads, public places, traffic and parking.
- **Traffic By-law,** 2021, provides for the regulation of public transport, municipal roads and traffic and safety on public roads in the area of jurisdiction of the City of Cape Town.

Other By-laws of relevance include the Parking By-law (2010), Wastewater and Industrial Effluent By-law (2013), Water By-law (2010, as amended), Tariff By-law (2007), Rates By-law (2007), Electricity Supply By-law (2010, as amended), and Community Fire Safety By-law (2002, as amended).

## 2.15 Planning frameworks

The following section outlines the relevant frameworks and plans associated with the proposed development.

### 2.15.1 Western Cape Spatial Development Framework (2014)

The Western Cape Provincial Spatial Development Framework (PSDF), 2014, is intended to provide a coherent framework for the Western Cape Province that serves as a basis for coordinating, integrating and aligning the delivery of national and provincial departmental programmes, supporting municipalities to fulfil their planning mandate and communicate the governments spatial development intentions to the private sector and civil society.

The PSDF is underpinned by the following core principles: spatial justice, sustainability, resilience, spatial efficiency, accessibility, quality, and liveability. The key objectives of the PSDF include:

- Aligning the future development pattern of the province with areas of economic potential and the location of key environmental resources;
- Delivering human development and basic services wherever they are required;

- » Strategically investing limited public-sector resources where they will yield the highest socio-economic returns;
- » Protecting biodiversity and agricultural resources; and
- » Minimising the consumption of scarce environmental resources, particularly water, fuel, building materials, mineral resources, electricity, and land, while ensuring that environmental protection is prioritised in areas where it outweighs the benefits of economic development.

The proposed development is well located in the Granger Bay Precinct within a high-potential urban node, and the development optimises existing infrastructure, supports economic intensification, and enhances public access along the coastline. The proposed development, therefore, aligns well with the Western Cape SDF by promoting spatial efficiency, sustainability, and strategic investment. It contributes to human development by providing a mix of residential, commercial, and recreational spaces in a well-connected area, while incorporating environmental considerations through coastal protection, land reclamation, and non-motorised transport infrastructure.

More specifically, the PSDF spatial agenda is pursued through spatial policies, clustered around the three themes of "resources", "space economy", and "settlement". The table below includes the themes and some of their policies relevant to the proposed development:

**Table 2-3: The themes and policies identified in the Western Cape Provincial Spatial Development Framework (PSDF), 2014, relevant to the proposed development**

| Theme | Policy | Applicability |
|---|---|---|
| Resources | R2: Safeguard inland and coastal water resources, and manage the sustainable use of water | The proposed development is located on the coast and includes land reclamation from the sea. A draft Marine Impact Assessment and Oceanographic Study have been undertaken to assess the anticipated environmental impacts and recommend mitigation measures associated with the proposed development. These studies indicate that no unacceptable damage to the marine ecosystems and coastal dynamics is anticipated if the recommended mitigation measures are implemented. The proposed development includes a mix of residential, commercial, and recreational spaces in a popular tourist area (V&A Waterfront), and is expected to improve both public access and tourism opportunities. |

| Theme | Policy | Applicability |
|---|---|---|
| Space Economy | E1: Use regional infrastructure investment to leverage economic growth | The proposed development is located within the Granger Bay Precinct, expanding on the V&A Waterfront, including a mix of residential, commercial, and recreational spaces. This is expected to contribute positively towards tourism and local revenue, benefiting local and national economic growth. |
| | E3: Revitalise and strengthen urban space-economies as the engine of growth | The proposed development includes optimising the use of already developed coastal land. The proposed development will include infrastructure associated with residential, commercial and recreational use, providing both private and public amenities. Non-motorised transport along the promenade and the provision of public space are associated with the proposed development. |
| Settlement | S1: Protect, manage and enhance the sense of place, cultural and scenic landscapes | The proposed development is to occur on the Granger Bay Precinct, V&A Waterfront, a highly urbanised area. The site is well-located, and the proposed development provides an opportunity to optimise the use of this land. The proposed development is not expected to increase urban sprawl but rather intensify development within the urban footprint of the City of Cape Town. |
| | S2: Improve inter- and intra-regional accessibility | The proposed development is an expansion of the V&A Waterfront, adding to the existing public facilities in the area in close proximity to public transport routes. |
| | S3: Promote compact, mixed-use and integrated settlements | The site is strategically located in close proximity to the CBD. The proposed development is to include residential, commercial and recreational use. This is to include both private and public facilities. |
| | S4: Balance and coordinate the delivery of facilities and social services | The location of the proposed development is on underutilised land for the multi-functional mixed-use development, which aligns with surrounding land uses, providing recreational, commercial and residential opportunities. |

### 2.15.2 City of Cape Town Spatial Development Framework (2023)

The approved 2023 Municipal Spatial Development Framework (MSDF) is a framework for long-term growth and development, and includes a spatial vision, policy parameters and development priorities to guide Cape Town to achieve a reconfigured and inclusive spatial form and structure. The MSDF guides infrastructure investment, urban growth, and sustainable land use. It emphasises three

spatial strategies: (1) building an inclusive, integrated, and vibrant city; (2) managing urban growth while balancing development and environmental protection; and (3) improving access to economic opportunities.

The V&A Waterfront is identified in the MSDF as a coastal node and is identified for intensified use within the Urban Inner Core of the City. According to this spatial planning category, coastal nodes are typically also destination-type places (i.e., areas of attraction on the coast) and within the growing, denser parts of the city. Existing and future coastal nodes include a range of functions, from businesses (shops, services, and restaurants), and social facilities (recreation and resorts) to residential developments. Coastal nodes are usually associated with forms of development that support their function as a point of attraction, rather than detracting from it. These nodes make responsible use of the social and economic benefits of the coast, certain public spaces, and historical and biophysical assets. They have been identified in locations that allow natural systems to function sustainably and are protected from flood risk. In these areas, public access must be preserved or actively enhanced.

The proposed development aligns with the MSDF's spatial strategies by contributing to the area's role as a vibrant coastal destination. The proposed development includes recreational, commercial and residential opportunities, and public access is prioritised in the design of the boardwalk and public pools that characterise the proposed section of reclaimed land. Due to the mixed-use and multi-functionality of the proposed development, it is expected to attract both locals and tourists. The proposed development therefore supports diverse land uses, enhances the tourism offering, improves public access to the V&A Waterfront, and promotes responsible coastal development.

The following spatial and policy aspects stated in the MSDF applicable to the proposed development should be considered when assessing development proposals:

- Urban development and coastal edges
- Biodiversity and Marine Protected Areas (MPAs), rivers, and wetlands
- Climate change-related information sources
- Cultural heritage assets, inclusive of protection and exemption initiatives

The MSDF also discusses how the South African metros and larger municipalities are experiencing lingering inequality as a result of the spatial legacy of apartheid. One way to drive a spatial restructuring agenda is to adopt an 'urban acupuncture' (i.e., focused and targeted) approach that enables transformative urban mixed land uses. This approach is promoted through the National Treasury's Urban Network Strategy (UNS) and supporting spatial planning and urban design guidance. It is aimed at restructuring the typical spatial organisation of cities to enable economic growth and encourage efficiencies through investment consolidation and agglomeration. The City has identified three precincts in which this planning and management initiative is implemented, and the V&A Waterfront falls part of the Gateway Catalytic Precinct where approaches to unlock the economic potential of the Foreshore are being investigated, as well as linkages between the CBD and V&A Waterfront.

### 2.15.3 City of Cape Town Local Municipality Integrated Development Plan (2022 – 2027)

The City of Cape Town Integrated Development Plan (IDP) is a five-year plan that serves as the principal strategic planning instrument that guides and informs all planning and development decisions in the municipality. Local government policies are anchored in three core principles in the IDP 2022 – 2027, namely, sustainability, resilience, and environmental transformation through transit-oriented development. These principles are aimed at achieving the City of Cape Town's IDP vision

of an opportunity city with an enabling environment for business and job creation. In addition, the City has identified 11 priorities that span their strategic focus areas (The Opportunity City, The Safe City, The Caring City, The Inclusive City, and the Well-Run City), some of which include:

- Economic inclusion;
- Safe communities;
- Building integrated communities;
- Resource efficiency and security; and
- Leveraging technology for progress.

The proposed development directly supports the City of Cape Town's IDP 2022–2027 priorities of economic inclusion, resource efficiency, and building integrated communities by intensifying land use within a key urban node already equipped with infrastructure and transport connections. In planning for "shared economic growth and development", one of the objectives of the City's Integrated Development Plan (IDP) is to "ensure that Cape Town continues to grow as an opportunity city". As part of this objective, a key goal is to attract investment and create jobs.
As a major tourism, leisure and commercial destination, the V&A Waterfront's daily working population is in the order of 16 000 people (including the fishing industry), and further development should see this number increase in the near future.

Located within the V&A Waterfront, a high-value mixed-use precinct, the development advances the City's vision of a compact and transit-oriented urban form by promoting pedestrian access, non-motorised mobility, and proximity to MyCiTi and other public transport. By integrating residential, retail, and public space components, the project contributes to inclusive economic growth, supports tourism, and reinforces Cape Town's positioning as an "Opportunity City" with sustainable urban regeneration at its core.

#### 2.15.3.1 City of Cape Town Comprehensive Integrated Transport Plan (2023 – 2028)

The Urban Mobility Directorate developed a new 5-year Comprehensive Integrated Transport Plan (CITP) 2023–2028, which aligns with the new term-of-office Integrated Development Plan (IDP) 2022–2027. The CITP is informed by community needs, stakeholder inputs, an evaluation of the existing state of transport in Cape Town and an assessment of the transport needs of residents, all of which help identify the challenges that the City needs to address to achieve 'A sustainable transport system that is integrated, efficient and provides safe and affordable travel options for all' (IDP objective 12).

The CITP vision includes efficient access to transport, opportunities related to improved connectivity, financially, socially, and environmentally sustainable forms of transport; and that all transport systems should be safe for all users. The CITP principles are pro-public-transport and NMT, connectivity, and inclusivity.

The V&A Waterfront's overall transport planning approach entails enhancement and improvement of public transport, in line with the City of Cape Town's transportation planning objectives and policies. To this end, development in Granger Bay will be serviced by a range of transport modes, including MyCiTi, Park & Ride, and micro mobility services, with improved integration between transport modes. Hence, no major access road upgrades are proposed.

Over and above public transport, site access improvements will entail the following:

- Access for private vehicles will be from Beach Road and Granger Bay Boulevard Extension (GBB Ext.).

- A pedestrian priority, shared space street will link the existing intersection of Haul Road and Beach Road with Granger Bay Boulevard and will provide local access to the development packages.
- A service/ entrance plaza off Granger Bay Boulevard will allow for service vehicles and private vehicle access to residential and hotel development packages and basement parking.
- Access off Beach Road for the boat launch facility will remain and be enhanced by a linear park space within a 30 m view corridor.
- Vehicular access to major parking garages will be from Granger Bay Boulevard and future Bay Street, with access to the coastal walk only permitted for service vehicles.
- Surface parking areas will be limited in order to create pleasant and usable internal spaces in the precinct.

### 2.15.4 Transit-Oriented Development Strategic Framework (2016)

Transit-Oriented Development (TOD) represents the intricate relationship between "Transit" (the operational/access imperative of an urban environment) and "Development" (the spatial manifestation of those that are within the urban economy). TOD is about changing, developing, and stimulating the built form of the city in such a way that the movement patterns of people and goods are optimised to create urban efficiencies and enable social equality and economic development. In the context of this Strategic Framework, TOD is seen as a planning, design, and implementation approach that can be employed to address inefficiencies in the urban form of the city. The V&A Waterfront's overall transport planning approach entails enhancement and improvement of public transport, in line with City of Cape Town's transportation planning objectives and policies, such as the TOD Strategic Framework (2016), which *inter alia* promotes new transport modes and integration with public transport to improve accessibility for people of all income levels. To this end, development in Granger Bay will be serviced by a range of transport modes, including MyCiTi, Park & Ride, and micro mobility services, with improved integration between transport modes.

### 2.15.5 Table Bay District Spatial Development Framework (2023)

The Table Bay District Spatial Development Framework (DSDF) 2023 forms part of the City of Cape Town's municipal planning framework and provides medium- to long-term guidance for land use planning and spatial transformation within the Table Bay district. It is an integrated plan that combines both spatial planning and environmental management (as part of an EMF) to support sustainable development, economic growth, and resilience in a strategically significant area of the city.

Table Bay is the economic heart of Cape Town, encompassing the Central Business District (CBD), the V&A Waterfront, major transport hubs, and significant tourism assets. The DSDF recognises this centrality and aims to guide development in a manner that promotes efficient land use, protects environmental and heritage resources, and enhances social equity. The key objectives of the Table Bay DSDF are:

- **Land Use Intensification**: Encourage the densification and diversification of land uses (residential and non-residential) in accessible, strategically located areas such as the CBD and V&A Waterfront.
- **Compact Urban Form**: Promote infill development and redevelopment of underutilised land to reduce urban sprawl and make efficient use of existing infrastructure.

- » **Economic Growth and Resilience**: Support commercial and tourism development, protect key economic nodes, and enable adaptive land use in response to changing work models (e.g., hybrid work).
- » **Environmental and Heritage Protection**: Integrate green infrastructure, protect coastal and ecological areas, and manage cultural and heritage assets.
- » **Inclusive Development**: Ensure that development contributes to spatial transformation, housing delivery, and equitable access to opportunities, particularly in historically disadvantaged areas.
- » **Public Transport and Accessibility**: Promote transit-oriented development by locating higher-density developments near public transport corridors and interchanges.

In terms of the Table Bay District SDF, Sub-district 1, the V&A Waterfront is identified for 'potential mixed use', which refers to the possibility of developing areas that incorporate various land uses, such as residential, commercial, and retail, within the same location.

The proposed development at Granger Bay aligns closely with the objectives of the Table Bay District Spatial Development Framework (DSDF). It promotes land use compatibility through a blend of residential, commercial, and public spaces in a high-value, economically strategic area. Its location within the V&A Waterfront supports the DSDF's emphasis on accessibility and transit-oriented development, while also reinforcing the V&A Waterfront's role in Cape Town's visitor economy. By fostering job creation and enabling diverse commercial activity, the project advances the DSDF's economic development goals. Furthermore, it supports spatial integration by enhancing the existing urban fabric without contributing to urban sprawl.

### 2.15.6 National Coastal and Marine Spatial Biodiversity Plan (2022)

The National Coastal and Marine Spatial Biodiversity Plan (NCMSBP) presents Critical Biodiversity Areas (CBAs) as sites that have been identified as being of high conservation priority by the marine biodiversity science community, using the global best practice of Systematic Conservation Planning to integrate the best available knowledge of marine and coastal biodiversity whilst striving for spatial efficiency and conflict avoidance where possible. Ecological Support Areas (ESAs) are often associated with CBAs. The ESAs include all portions of Ecological or Biological Support Areas that are not already within MPAs or CBAs, and a 5 km buffer area around all MPAs (where these areas are not already CBAs or ESAs). Within ESAs, negative impacts of human activities on key biodiversity features are managed and minimised to maintain the features in at least a functional, semi-natural state and/or to allow the area to improve in ecological condition. The proposed Granger Bay area overlaps with an ESA at the western edge (at the Oceana Power Boat Club) but otherwise falls entirely outside of any CBA delineated areas.

### 2.15.7 Draft Marine Biodiversity Sector Plan (2024)

Marine Sector Plans specify the overall development objectives and priorities of each marine sector for the coming two decades from a national point of view. These plans summarise the national spatial and sector priorities that each marine sector would like to see translated into the Marine Area Plans across the Marine Planning Areas as part of the coming Marine Area Plan development processes.

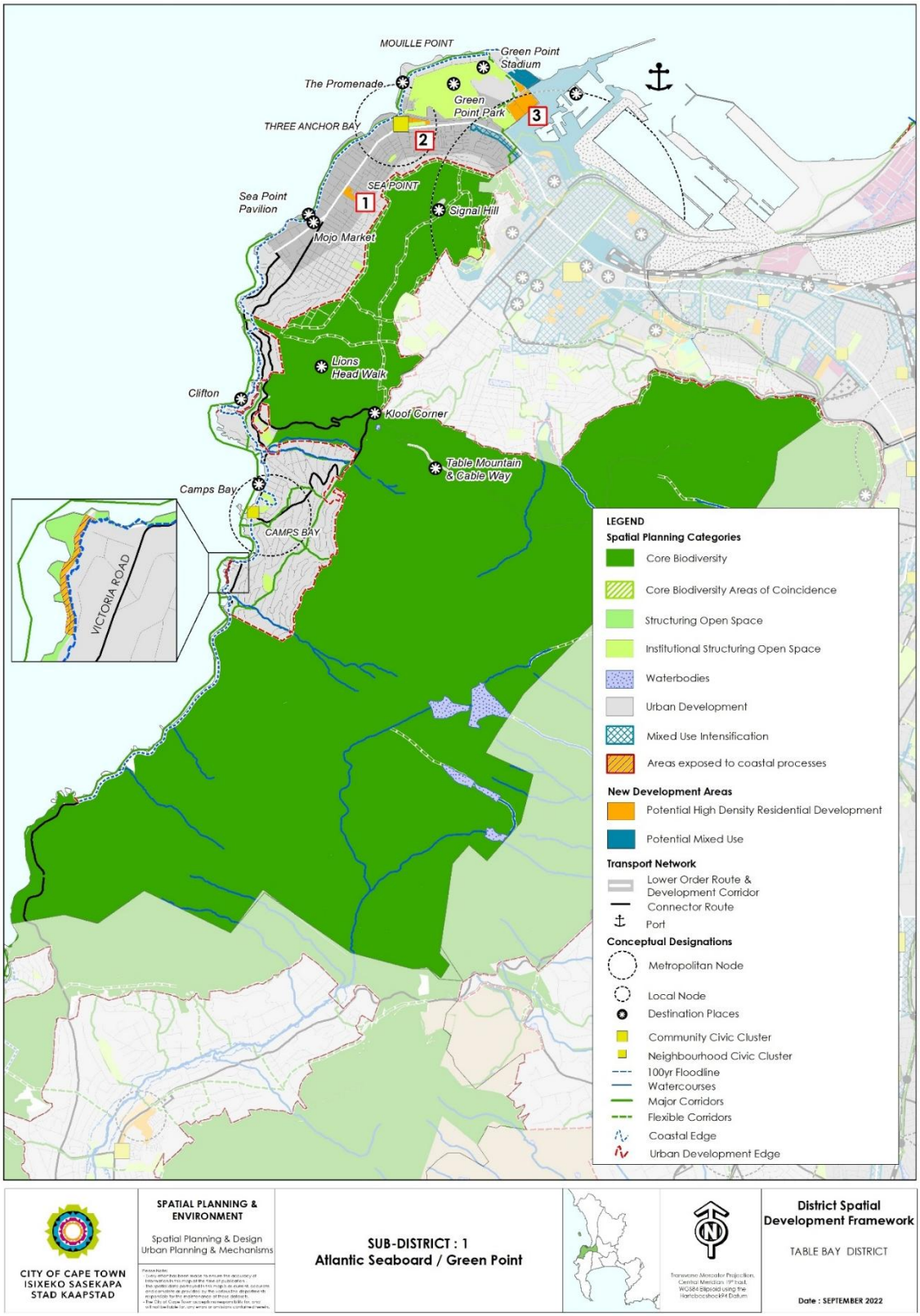



**Figure 2-2: Spatial planning categories in the City and Waterfront area (extracted from the 2023 Table Bay District SDF)**

The 2024 draft Marine Biodiversity Sector Plan was developed by the Biodiversity Sector Plan task team, and draws upon the principles and findings of the NCMSBP to inform its specific strategies. CBA assessment provides a spatial plan for the natural environment and is designed to inform planning and decision-making in support of sustainable development. CBA maps are developed using the principles of systematic biodiversity planning. These maps comprise three categories of biodiversity priority areas, namely Protected Areas, CBAs (called "Biodiversity Conservation/Restoration Areas" in the Marine sector plan for the Biodiversity Sector 2024) and Ecological Support Areas (ESAs) ("Biodiversity Impact Management Zones"), which are jointly important for the persistence of a viable representative sample of all ecosystem types and species, as well as the long-term ecological functioning and connectivity of the landscape or seascape as a whole. The site overlaps an ESA ("Biodiversity Impact Management Zone"), and the list of sea-use activities and their compatibility with this zone are included in the draft Marine Biodiversity Sector Plan. According to this list, recreation and tourism uses such as beach recreation, water sports, diving, and recreational fishing are compatible, which aligns with the proposed development and associated activities.

### 2.15.8 Development Planning Context

In addition to the abovementioned legislation and policy, the development planning context is important to consider in relation to the proposed development when assessing whether the proposal is appropriate for the site and surroundings.

*The below information is extracted from the 2013 ISOCARP Congress report on Cape Town's V&A Waterfront Project Adaptive Re-use as a Foundation for Sustainable Urban Renewal and the 2018 Environmental Impact Assessment Report for the Proposed Mixed-Use development of Erf 173712 Cape Town, Granger Bay Precinct and Associated Sea Defence Works, V&A Waterfront, Cape Town.*

#### 2.15.8.1 Background

Land reclamation has played an important role in the past development of the Cape Town Harbour and V&A Waterfront. In 1937, the South African Parliament approved plans for a new deep water harbour basin to be constructed to the south of the Victoria and Alfred Basins, with an associated extensive land reclamation project to create a new Cape Town Foreshore. Work was only completed in 1945 due to delays associated with the Second World War. A 230ha area of Foreshore land was created in the process of city expansion. Slow City development meant that by the 1970s, much of the area remained vacant and was used as all-day parking areas. Furthermore, in the 1960s, the Foreshore Freeway construction programme facilitated increased access and vehicular movement around Cape Town's CBD, but it effectively also cut the city off from its historic water's edge.

The area became increasingly isolated due to fencing, access control associated with oil tank farm installations, and in the 1970s, the area was derelict and underutilised. In the early 1980s, the then-Mayor of Cape Town formed a Waterfront Steering Committee, which started lobbying to reconnect the City with the sea. The growing public awareness resulted in the formation of a committee convened under the chairmanship of Arie Burggraaf, who was the Chief Engineer of South African Harbours at the time.

The Burggraaf Committee reported on Cape Town Harbour in 1987, proposing that the historic docklands around Victoria and Alfred Basins be redeveloped as a mixed-use area, with the continuing operation of a working harbour. The Cabinet of the South African Government accepted the recommendations in full in June 1988. The Burggraaf Commission identified ports that were no longer essential for cargo transportation or industrial harbour activity in 1988, which resulted in the concept of commercial development for the V&A Waterfront. The V&A Waterfront was established

as a wholly-owned subsidiary of Transnet Ltd to redevelop the historic docklands around Victoria and Alfred Basins as a mixed-use area with a focus on retail, tourism, and residential development, and the continued operation of a working harbour. The main planning objective for the project was the re-establishment of physical links between Cape Town and its historic waterfront to create a quality environment, a desirable place to work, live, and play, and a preferred location to trade and invest for locals and tourists. In 1989, the Legal Succession to the SATS Act was promulgated, which enabled the landowner at the time (Transnet) and the City of Cape Town to reach an agreement on the development rights, which acknowledged that the V&A Waterfront property of approximately 80ha would be developed over a long period of time, factoring in market demand.

Since the development of the V&A Waterfront in Cape Town commenced over 30 years ago, the property has become a premier national and international tourist destination, attracting over 20 million visitors per annum. As the Burggraaf Commission intended, over this period, the property has been developed for a range of purposes, including retail, commercial, residential, educational, and recreational, in tandem with the working harbour and fishing industry. The V&A Waterfront is now a place of rich and diverse entertainment and cultural attractions, as well as accommodating a broad spectrum of economic opportunities.

#### 2.15.8.2 Development Zone

The zoning "Development Zone" was established in 1993, subsequent to the original Zoning Agreement. The Development Zone was a special zoning allocated to the V&A Waterfront in terms of the Legal Succession to the South African Transport Services Act (SATS), 1989 (Act 9 of 1989). Section 17 of the MPBL refers to the land subject to the provisions of section 13 of the Legal Succession of the South African Transport Services Act, 1989 (Act 9 of 1989). This zoning embodies a basket of rights and a planning approval process, known as the Package of Plans. The process promotes increasing levels of specificity as development proposals evolve from policy and objectives for the site (Development Framework) to spatially defined development guidelines for a functional area (Precinct Plan) and then to site-specific development proposals (Site Development Plan – SDP). Unlike conventional town planning zones, development controls such as setbacks, coverage, building heights, etc., are not predetermined, but are determined according to policies, objectives and design imperatives and at various stages of project development.

The Development Framework and the Package of Plans zoning mechanisms allowed for flexibility in allocating rights to particular sites to be developed. The ability of the property to respond to changing market forces is encapsulated in the Development Framework and is a specific approved policy component of the Development Zone.

#### 2.15.8.3 Governing Agreement (October, 2021)

Since 1989, the Applicant has undertaken and completed extensive development in the area. In terms of the agreements with Transnet, reclamation is restricted to the sea areas immediately adjacent to the V&A Waterfront. A "Governing Agreement" was signed between Transnet and the three Transnet retirement funds on 31 October 2001. In terms of the Governing Agreement, Transnet undertook certain contractual obligations relating to the reclamation of land from the sea that would be required for the remaining anticipated development of the V&A Waterfront. It was recorded that one of the remaining obligations owed by Transnet to the Transnet Pension Fund was to procure the necessary governmental approval/s, inter alia, for reclamation of land from the sea to authorise and enable the construction of shore protection works as well as specified areas for future development of the V&A Waterfront.

## 2.16 Other Policies and Strategies

Some of the City's other applicable policies and strategies are listed below:

### 2.16.1 City of Cape Town's Climate Change Strategy (2021)

The City of Cape Town's Climate Change Strategy, approved by the City Council on 27 May 2021, recognises that responding to climate change and dealing with its impacts are essential for building the City's resilience. It notes that the climate changes in Cape Town include a rise in mean sea level and increased coastal erosion. The relevant goals for the proposed development include:

- **Goal 3: Reduce demand for water to protect water resources and ensure the sustainability of supply**

» Although not included in this development proposal, the V&AW's long-term objective for the whole property holding is to substantially reduce reliance on the City of Cape Town (CoCT) for the supply of water. This will be implemented in a phased manner with the objective of eventually relying on the CoCT mains connections to the V&A Waterfront only for critical situations. In this regard, V&AW's Desalination Plant, located outside the application site area on V&A Waterfront-owned property, is scheduled to become operational during 2025. It has been designed to meet current water demands and to cater for the future growth of the property, including the application site. The desalination plant will have an initial capacity to produce 3,300 m³/d and will be upgradable, with minimal disruption, to 5,000 m³/d. Hence, no upgrades would be required on the CoCT potable water network.

- **Goal 6: Take action to reduce flood risk and storm damage through disaster mitigation approaches**

» The oceanographic study includes wave transformation modelling of storm conditions. Various mitigation measures are included to reduce the risks associated with wave reflections and the replacement of the existing unprotected embankment and gravel beach in the form of a permanent rock revetment and two breakwaters ensure shoreline protection, as well as providing shelter for portions of the site from storm action.

- **Goal 7: Promote coastal resilience to the benefit of both coastal communities and coastal ecosystems**

» The development is expected to enhance inclusive coastal access and contribute to broader public benefit if implemented with due attention to access equity, local employment prioritisation, and support for small enterprises. These aspects align with key sustainability principles outlined in the National Environmental Management Act (NEMA) and the Integrated Coastal Management Act (ICMA), supporting the promotion of socially and economically inclusive development. The replacement of the existing unprotected embankment and gravel beach, a permanent rock revetment and two breakwaters will be established to ensure shoreline protection and provide shelter from storm action.

- **Goal 8: Put in place effective cooperative and empowering mechanisms for addressing complex coastal management issues in the context of climate change**

» The National Environmental Management: Integrated Coastal Management Act 24 of 2008 (ICMA) is the primary environmental legislation responsible for the integration and coordination of various coastal and marine management efforts. This integrated coastal management addresses the governance of human activities affecting the sustainable use of goods and services generated by coastal and marine ecosystems. ICMA is applicable here in terms of the Coastal Management Policy. Section 7C of the ICMA notes that reclamation of land from the

sea will be considered only in exceptional circumstances and when it is not contrary to the purpose of coastal public property (i.e. to improve public access to the seashore, to protect sensitive coastal ecosystems, to secure the natural functioning of coastal processes, and to provide protection from dynamic coastal processes including sea level rise). Furthermore, the Scoping and EIA process entails a public participation process, enabling a cooperative and empowering mechanism within coastal management by allowing I&APs to participate in the environmental authorisation process, which requires all concerns raised within the PPP to be addressed.

A Climate Change Impact Assessment will also be undertaken to ensure climate change-related risks are assessed and avoided where possible.

### 2.16.2 City of Cape Town Management of Urban Stormwater Impacts Policy (2009)

The City of Cape Town's 2009 Management of Urban Stormwater Impacts Policy will inform the development of a Stormwater Management Plan for the site, with the objectives of improving the quality of stormwater runoff and controlling the quantity and rate of stormwater runoff. No upgrades would be required to the CoCT stormwater networks, as the V&A Waterfront networks are self-contained within the V&A Waterfront property and drain to the ocean. An existing 1.5m diameter stormwater drain within Granger Bay is proposed to be extended to the new revetment, and the design of this extension will take into account storm surge events.

Multiple additional stormwater outfalls are proposed through the sea wall/revetment. Water quality controls within the Granger Bay study area will include:

» Use of permeable paving within the public realm, where appropriate.
» Controlled directing of surface flows into landscaped areas and planters within the public realm. This will assist in reducing irrigation requirements as well as the filtration of runoff.
» Hydrocarbon interceptors installed on external delivery and parking areas. Note that most of the delivery and parking areas will be in basements, where sumps will be provided that do not directly connect to stormwater drains.

### 2.16.3 Environmental Strategy for the City of Cape Town (2017)

The City's Environmental Strategy, 2017, applies to decision-making by the City of Cape Town and determines a set of 'desired outcomes' in relation to its vision to '*enhance, protect and manage Cape Town's natural and cultural resources for long term prosperity, in a way that optimises economic opportunities and promotes access and social well-being*'. The proposed development seeks to improve public access to the coastline, to secure the natural functioning of coastal processes, protect sensitive coastal ecosystems, and provide protection from dynamic coastal processes, including sea level rise. The draft Marine Impact Assessment notes that safer and more formalised access to the marine edge could enhance user safety and environmental management compared to the current *ad hoc* use patterns. A Climate Change Impact Assessment will also be undertaken to ensure climate change-related risks are assessed and avoided where possible.

### 2.16.4 Integrated Coastal Management Policy of the City of Cape Town (2014)

The Integrated Coastal Management Policy, 2014, is central to reducing risk to the City and its communities and is core to retaining and enhancing the many current and future economic, social and environmental opportunities of the City's unique coastline into the future. The principles determined in the Integrated Coastal Management policy also complement and support the principles defined in the National Integrated Coastal Management Act, to which the City is legislatively bound. The policy directive details outline how:

- **The coastline is a common asset, a shared space and a unique natural and cultural environment which belongs to all South Africans.**
  - The proposed development centres on the reclamation of approximately 3.2 hectares of land from Table Bay to accommodate new coastal public amenities and new mixed-use development and coastal protection. The proposed development includes anticipated improved employment prospects, enhanced public access to the coast, and broader urban upliftment.

- **Equitable access to the coast is a priority while ensuring that this access is regulated, organised and controlled in a manner that does not detract from or negatively impact the coastal environment while also ensuring ease of access for all.**
  - Public access is a core aspect of the proposed development, which includes the construction of new public amenities such as the new bay, providing sheltered waters for boating, kayaking, and swimming. Land-based amenities will include a coastal public walkway, a slipway, a fixed quayside, landscaped promenade, tidal pools, pedestrian paths and open areas.
  - The proposed development includes a new slipway to replace the existing slipway and new sheltered public waters in the proposed bay. Access to a functioning slipway is expected to be retained throughout the construction process by constructing a new slipway before the closure of the existing one. Details of the operational management of this facility will be determined by the applicant to ensure continued accessibility and provision for maintenance and upkeep.

- **The coastline underpins much of Cape Town's economy and holds significant potential to contribute further economic growth and social development opportunities in Cape Town. However, the economic and social value of the coastline must be finely managed as poor decision making, poor management, prioritising short-term gains, over-development or inappropriate development can substantially diminish current economic and social value while removing or reducing the potential for any future economic and social opportunities.**
  - The proposed Granger Bay development is anticipated to act as a strategic driver by injecting short-term capital expenditure during construction and promoting long-term economic growth through enhanced residential, commercial, and tourism activity. As Cape Town seeks to strengthen its economic resilience, integrated mixed-use developments in high-value urban nodes can contribute meaningfully to Gross Value Added expansion and inclusive growth.

- **Coastal recreation takes many forms and is one of the largest social activities in Cape Town. Coastal recreation underpins a range of economic activities in Cape Town and provides significant social development value.**
  - New public amenities associated with the proposed development include the new bay, providing sheltered waters for boating, kayaking, and swimming. Land-based amenities will include a coastal public walkway, a slipway, a fixed quayside, a landscaped promenade, tidal pools, pedestrian paths and open areas.

- **In order to reduce coastal risk, especially given the future impacts of climate change on sea level rise and increased frequency and intensity of coastal storm surges, it is imperative that we maintain a healthy functioning coastline. By maintaining the integrity of the coastline, the economic, social and value of the coast will be optimised.**

- The replacement of the existing unprotected embankment and gravel beach with a permanent rock revetment and two breakwaters will provide shoreline protection, as well as shelter for portions of the site from storm action. A Climate Change Impact Assessment will also be undertaken to ensure climate change-related risks are assessed and avoided where possible.

- **Cape Town's coastline has a varied and rich history, spanning several millennia. It is integral to our history, heritage, sense of place and unique identity. In addition, the coastal landscapes underpin the City's scenic routes, global desirability and recognition.**
  - In terms of the 2011 Heritage Record of Decision (RoD), the heritage significance of Fort Wynyard has been established and any development in Granger Bay precinct must respond to the aspects described in the RoD, including that a 30m wide view corridor from the main gun emplacements to the coastline must be kept open to provide a sense of the link between the fort and Table Bay. The RoD also states that a public pedestrian route along the water's edge in Granger Bay is required, as such a route would be a major new city amenity which would provide an opportunity to view two World Heritage Sites (Robben Island and Table Mountain) from this coastal setting. The proposed development aligns with this as it includes a coastal public walkway and the height of buildings is limited to 21.5m above mean sea level [MSL] to maintain key views within the Arc of Fire. The HIA, inclusive of the VIA and Marine AIA, will be completed during the EIA Phase and made available with the EIA Report.

- **Risk management and mitigation associated with coastal erosion and storm surges needs to be appropriate and sustainable, including multi-disciplinary approaches aimed at resolving and adapting to the expected impacts of climate change.**
  - The replacement of the existing unprotected embankment and gravel beach with a permanent rock revetment and two breakwaters will provide shoreline protection, as well as shelter for portions of the site from storm action. The Climate Change Impact Assessment will also contribute to risk management associated with the proposed development.

## 2.17 Guidelines

There are a number of guideline documents that must inform the work of the environmental practitioner and the various specialists. The principles contained in these documents will be incorporated into the various aspects of the study.

The following guidelines, frameworks, and principles are applicable to the scoping and EIA process:

- Public Participation Guideline, October 2012 (Government Gazette 35769);
- DEA&DP and DEA Guidelines published in terms of the NEMA EIA Regulations, in particular:
  - Guideline on Alternatives (DEA, 2014);
  - Guideline on Transitional Arrangements (DEA&DP, March 2013);
  - Guideline on Alternatives (DEA&DP, March 2013);
  - Guideline on Public Participation (DEA&DP, March 2013); and
  - Guideline on Need and Desirability (DEA&DP, March 2013);
- Information Document on Generic Terms of Reference for EAPs and Project Schedules (March 2013);
- Integrated Environmental Management Information Series (Booklets 0 to 23) (Department of Environmental Affairs and Tourism (DEAT), 2002 – 2005);
- Guidelines for Involving Specialists in the EIA Processes Series (DEA&DP)

» Department of Environmental Affairs (2017), Public Participation guideline in terms of NEMA EIA Regulations
» Department of Environmental Affairs (2017), Guideline on Need and Desirability

These guidelines are the basis for this Scoping Report and associated specialist reporting, as well as the Scoping and EIA process currently underway.

# CHAPTER 3

# SITE DESCRIPTION AND RECEIVING ENVIRONMENT

**January 2026**

**Final Scoping Report**

Infinity Environmental

# 3 SITE DESCRIPTION AND THE RECEIVING ENVIRONMENT

This chapter provides an overview of the receiving environment for the proposed expansion of Granger Bay Precinct at the V&A Waterfront (the site). The receiving environment includes social, physical, biological, cultural heritage, social and economic aspects that may be impacted by the proposed expansion, or which may affect the proposed expansion and development.

This chapter includes scoping-level information about the receiving environment. Assessments of potential impacts will take place during the EIA phase. The information provided is a basis from which to identify and assess potential issues and impacts of the proposed project on the environment. The information provided in this chapter has been sourced from:

- Draft impact assessments and status quo reports prepared by the project specialists **(See Appendix D)**;
- Aerial imagery;
- Site visits;
- The City of Cape Town's Biodiversity Report and Biodiversity Network;
- The National Environmental Screening Tool Report and Site Sensitivity Verification Report; and
- Other relevant national or provincial mapping and spatial datasets.

## 3.1 Site Description

The Granger Bay Precinct lies west of Beach Road and north of Granger Bay Boulevard. The coordinates of the site are provided below (Table 3-1). The proposed site includes a portion of Erf 173712 seawards of the 100m setback from the highwater mark, a portion of Erf 177853 (undeveloped land between Erf 173712 and the highwater mark), and land to be reclaimed from the sea below the highwater mark (Figure 3-1 and Table 3-2). The site, inclusive of the proposed reclaimed land and the proposed new bay, is approximately 107 550 m$^2$ in extent.

This site is located within the V&A Waterfront, a popular recreational urban area and tourist destination located southeast of Mouille Point and adjacent to Fort Wynyard. The proposed site is bordered by Beach Road to the southwest, Granger Bay Boulevard to the southeast and Haul Road to the northeast. The proposed site is located approximately 21km from the Cape Town International Airport and approximately 4km from the Cape Town Central Business District (CBD).

**Table 3-1: Site Coordinates**

| Location boundary | Latitude | Longitude |
|---|---|---|
| North | 33°54'1.08"S | 18°25'4.15"E |
| South | 33°54'10.29"S | 18°25'1.17"E |
| East | 33°54'4.33"S | 18°25'15.49"E |
| West | 33°54'6.28"S | 18°24'49.51"E |

**Table 3-2: Property details**

| Property number | Surveyor-General code | Extent |
|---|---|---|
| 173712 | C01600070017371200000 | 64832.27 m$^2$ |
| 177853 | C01600070017785300000 | 9075.35 m$^2$ |

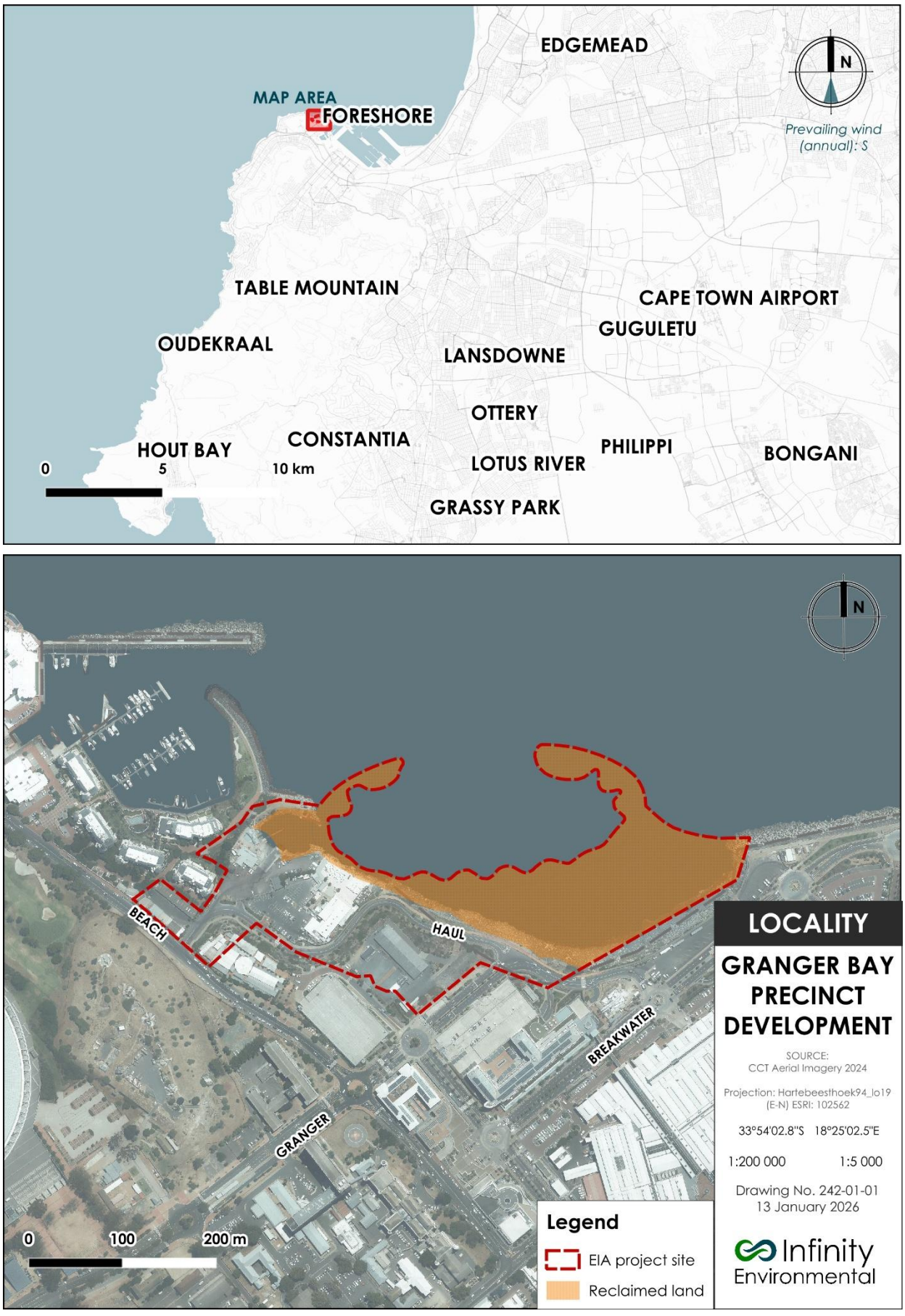



**Figure 3-1: Locality Map of the proposed development**

The site was zoned as Transport Zoning 1: (Development Zone) in accordance with the March 1993 zoning agreement between CoCT, Transnet, and V&AW. The zoning of the V&AW emanated from the Legal Succession to the South African Transport Services (SATS) Act, 1989 (Act No. 9 of 1989), notably Section 13, which provided for an 'agreement' between the V&A Waterfront (Pty) Ltd, the CoCT and Transnet on the principles and approach for developing the Waterfront property. These principles are recorded in the 'Heads of Agreement' agreed to between the three parties in 1991.

The 'Heads of Agreement' provided for the future recording of a zoning. The zoning of the property as 'Development Zone' was subsequently recorded in March 1993 and was incorporated as Item 17 in the City's Development Management Scheme (2015). This section states that "all land subject to section 13 of the Legal Succession of the SATS Act, 1989 is deemed to be zoned Transport Zoning 1: Transport Use (TR1)". Furthermore, item 17 states that the provisions and conditions contained within an agreement (between the City and SATS or any of its divisions or successors in title) shall prevail over the provisions of the TR1 zoning. Effectively, then, the 'Development Zone' of March 1993 and the associated Package of Plans approach to planning and development in the Waterfront constituted the development rules for the V&AW.

Erf 173712 and Erf 158570-re were zoned for **Development (TR1)**, a special zoning allocated to the V&A Waterfront in terms of the Legal Succession to the South African Transport Services Act (SATS), 1989 (Act 9 of 1989). The erven were part of a rezoning application to Mixed Use (MU3), which was approved on 1 December 2025. The land-use planning context will be updated in more detail in the upcoming EIA report.

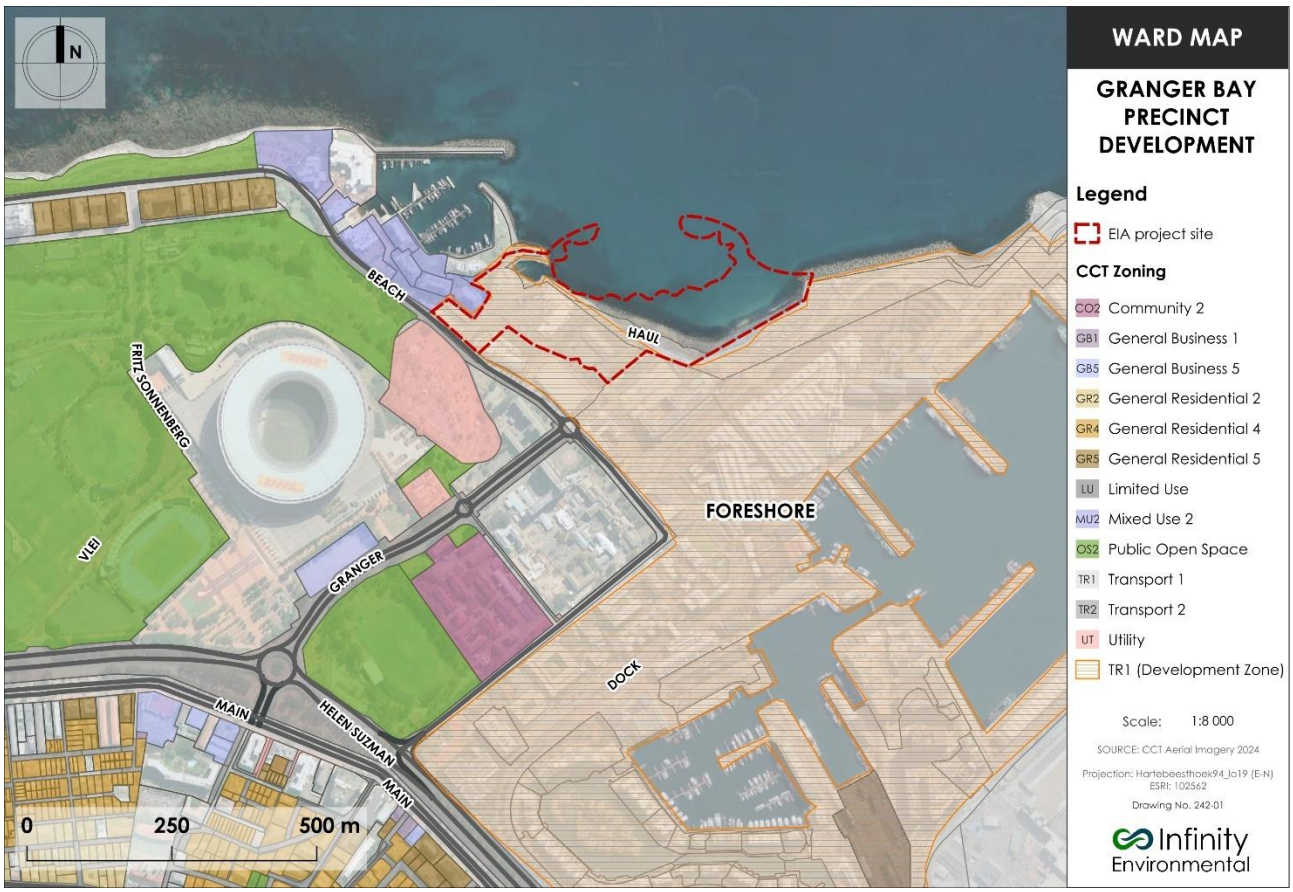



**Figure 3-2: Zoning Map of the surrounding area**

## 3.2 Land and Marine Environment Uses

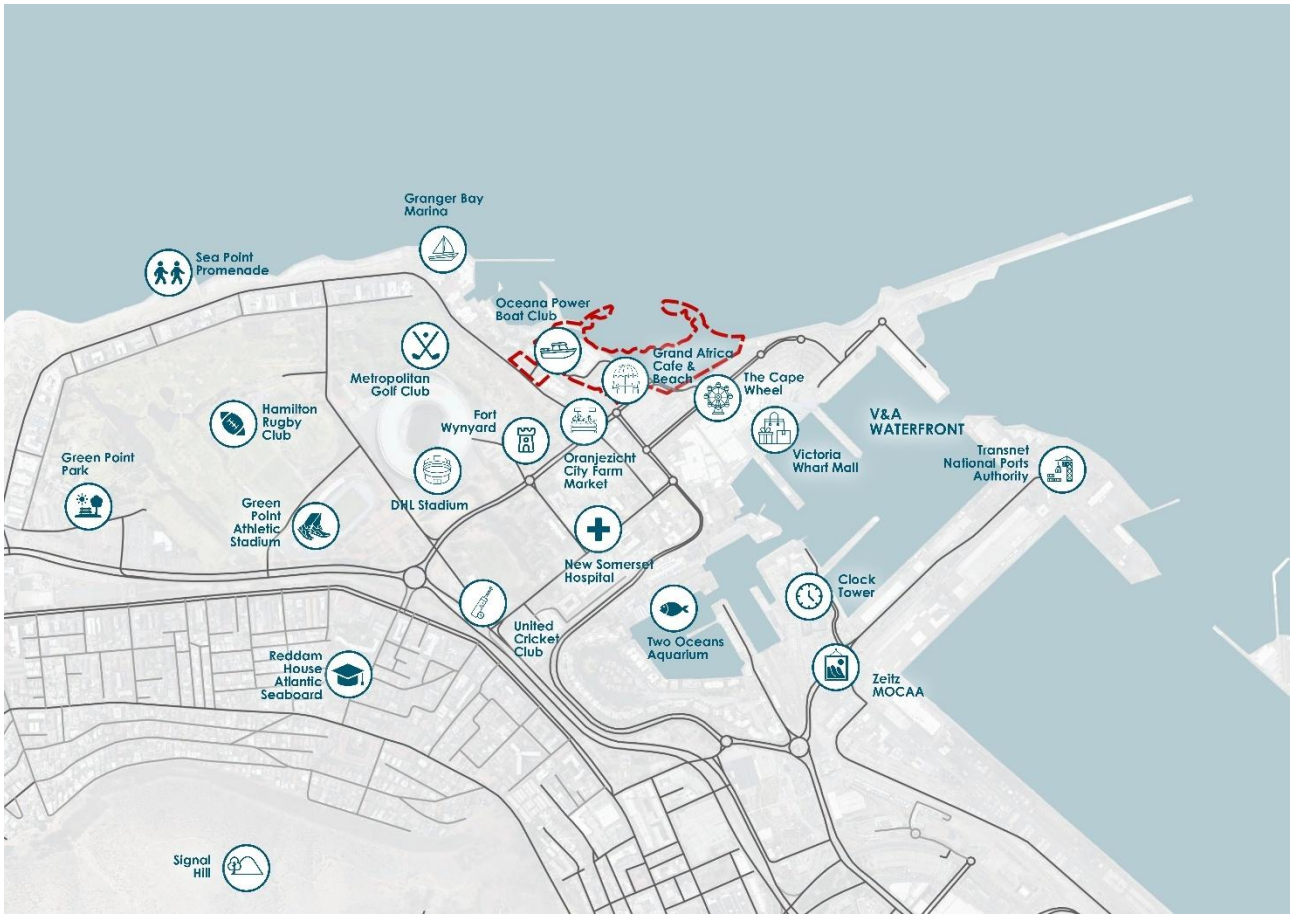



**Figure 3-3: Site and surrounding land**

### 3.2.1 Site Land and Ocean Uses

The proposed site is mostly transformed and contains commercial and retail opportunities.

A small portion of Erf 173712, located to the northwest of Haul Road, is at low elevation and is leased to the Oceana Power Boat Club (OPBC), including a small craft harbour, launch site, clubhouse and boat storage area. The OPBC is mainly utilised by recreational users such as power boats, jet skis, recreational fishermen, etc. Oceana has a jetty and slipway for launching (Photograph 3-1) as well as a restaurant and parking area on site (Photograph 3-2 and Photograph 3-3). There is also a storage/parking area for the Oceana Power Boat Club located in the western portion of the site (Photograph 3-4).

There are some temporary land uses on the proposed site, including the Grand Africa Café and Beach Restaurant (Photograph 3-5 and Photograph 3-6), and a section of Oranjezicht City Farm Market (which has since relocated). A section of the Erf 173712 has been developed as a parking area for the V&A Waterfront, located adjacent to the site boundary on an elevated portion of the Erf that was historically a spoil area from previous phases of the V&A Waterfront development. The parking is distributed across four parking platforms, providing approximately 1.2 ha of parking space (Photograph 3-7). The area south of the parking area on Erf 173712 used to be the Atlantic Lookout venue, but this building has recently been demolished, and the construction material remains on the site (Photograph 3-8).

A section of Haul Road transects the site and separates the Oceana Power Boat Club and Grand Africa Café and Beach from the previous Oranjezicht City Farm Market site. The site also has pedestrian walkways along Haul Road and stairways that link the lower site area to the parking structure (Photograph 3-9).

The marine environment included in the proposed site consists of a gravel beach and dolosse revetments (Photograph 3-10) along the coastline to dissipate waves with a slipway to launch boats and a small dock in front of the Oceana Power Boat Club (Photograph 3-1). Erf 177853 lies between the north-western cadastral boundary of Erf 158570-RE and the high-water mark. Most of this land consists of the edge of the fill platform up to the high-water mark, part of Haul Road, and the recently constructed Promenade Walkway (Photograph 3-11 and Photograph 3-12).

### 3.2.2 Surrounding Land and Ocean Uses

The surrounding land uses of the proposed site are commercial, residential, transport and open space. Multiple sporting facilities are located just around the site, namely the Metropolitan Golf Club, Hamilton Rugby Club, the Green Point Cricket Club, Green Point Athletic Stadium, the United Cricket Club and the DHL Stadium. Recreational areas and activities surrounding the proposed site include the Green Point Park, Sea Point Promenade, the previous site of the Oranjezicht City Farm Market, V&A Waterfront (Figure 3-3), Zeitz MOCAA, Clock Tower and Two Oceans Aquarium (Figure 3-3).

The marine environment surrounding the site is well utilised by the Granger Bay Marina, the V&A Waterfront Harbour, the Cape Town Harbour and Transnet Ports, and is utilised as a recreational zone with Mouille Point Beach and Three Anchor Bay Beach near the site. This site also forms a part of the residential development that extends from Three Anchor Bay along the coastline to the Water Club.

Photograph 3-1: Oceana Power Boat Club jetty (left) and slipway

Photograph 3-2: Oceana Power Boat Club restaurant


Photograph 3-3: Oceana Power Boat Club parking area


Photograph 3-4: Storage/parking area for the Oceana Power Boat Club

Photograph 3-5: View of the Grand Café and Beach from the east

Photograph 3-6: Parking lot behind The Grand Café and Beach

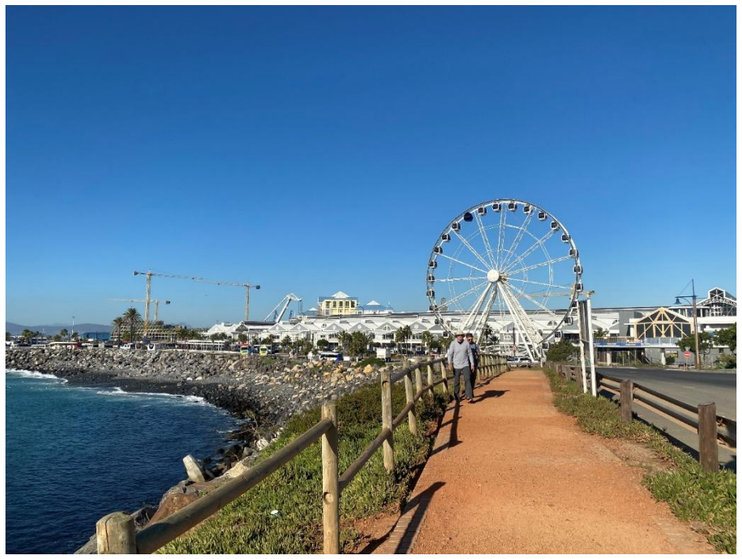
Photograph 3-7: Three-story parking structure adjacent to the former Oranjezicht City Farm Market site

Photograph 3-8: View of the construction spoil area on site (location of the previous The Lookout Venue)

Photograph 3-9: Pedestrian walkway next to Haul Road (left) and stairway to the parking structure (right)

Photograph 3-10: Area to be reclaimed showing the dolos revetment (view from the east of the site)

Photograph 3-11: Area to be reclaimed showing the gravel beach



Photograph 3-12: Land Surrounding the site showing the promenade, V&A Waterfront Mall and Ferris Wheel

## 3.3 Biophysical Environment

### 3.3.1 Climate

Granger Bay, located in Cape Town, South Africa, has a Mediterranean climate that is characterised by warm, dry summers and cool, wet winters with rainfall peaking in the winter months (Table 3-3). Cape Town's climate is also influenced by changes in ocean conditions due to its location on the coast. The average water temperature range of the Atlantic Ocean adjacent to Granger Bay is 15°C to 19°C.

**Table 3-3: Climatic conditions of the proposed site**

| Climatic condition | Description |
|---|---|
| Seasons | Mildly cold winters and warm summers |
| Average winter temperature | 8°C to19°C |
| Average summer temperature | 16°C to 28°C |
| Average annual precipitation | 584 mm |
| Wind | Westerly winds in winter and southeasterly winds mostly in summer |
| Humidity | Moderate humidity |

### 3.3.2 Topography

The topography of the proposed Granger Bay Precinct site has a subtle increase in elevation from the western section to the eastern section of the site land, for example, the elevation near the Oceana Power Boat Club is around 1 metre above sea level (masl), whereas the elevation near the previous location of the Oranjezicht City Farm Market is about 12masl. However, the proposed site is generally flat and increases steadily to the base of Signal Hill in Green Point and increases to around 350masl at the top of Signal Hill (Figure 3-4).

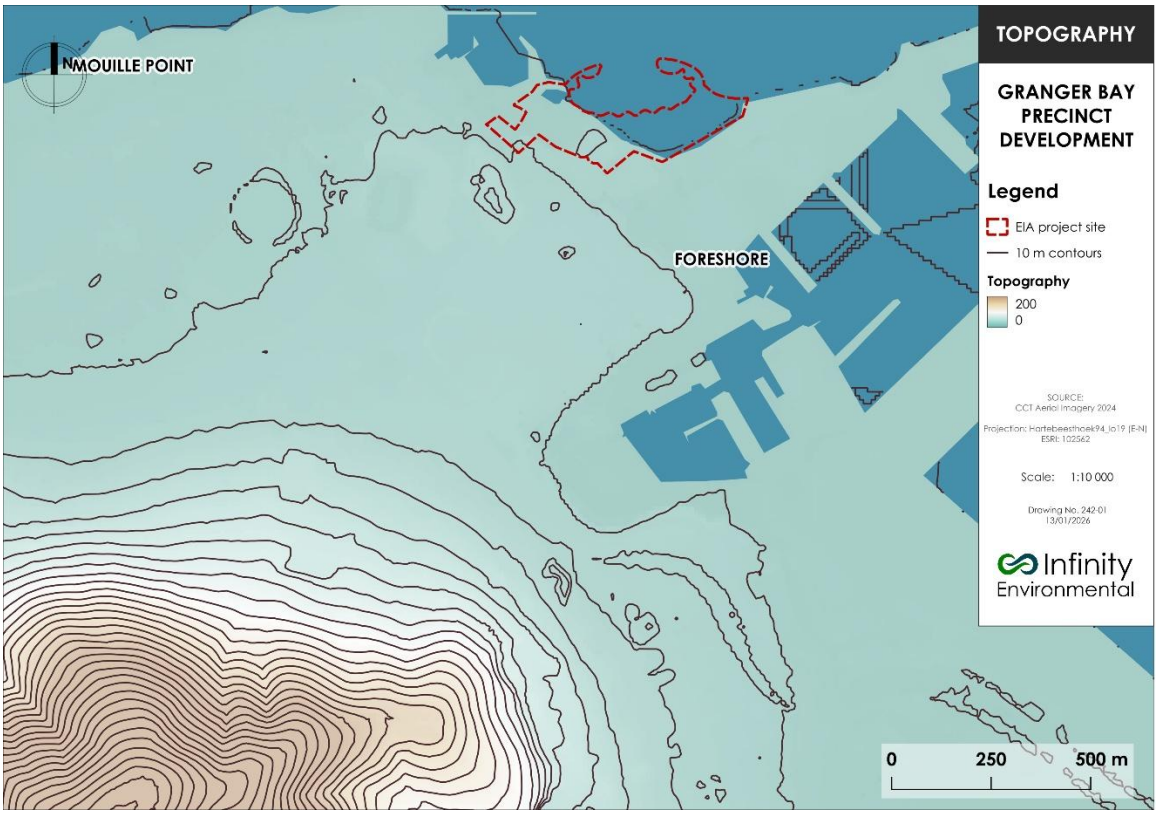



**Figure 3-4: Site topography (10m contours)**

### 3.3.3 Groundwater and Geology

According to Cape Farm Mapper, the soils on site are young with limited pedological development and are at a depth of around 450mm to 750mm. Additionally, the soil erodibility is moderate with an erodibility factor of 0.48 and consists of less than 15% clay.

The proposed Granger Bay Precinct site overlays a portion of the Malmesbury Group and Cape Granite Aquifer, a major fractured aquifer with an average yield of 0.1 – 0.5 l/s. The Malmesbury Group consists of metavolcanic and metasedimentary rocks, including greywacke, phyllite and quartzite of the Tygerberg Formation, whereas the Cape Granite Group consists of porphyritic granite and biotite granite of the Cape Peninsula Pluton and Cape Granite Suite. Limestone is rare and usually absent in these landscapes.

The electrical conductivity of the aquifer ranges between 70 – 150 mS/m, indicating a good to moderate groundwater quality based on DWAF (2000); however, quality may vary due to geological heterogeneity in the area. The site is classified as most vulnerable to surface-based contaminants with a high susceptibility (Water Research Commission, 1993). Although this aquifer may be less susceptible to contamination due to weathering clay minerals, which reduces permeability. According to Cape Farm Mapper, the depth to groundwater is 7.46 metres below ground level (mbgl) and has a recharge of 75.39 mm/a.

### 3.3.4 Terrestrial Environment

The proposed site is located within the Cape Floristic Region (CFR), one of six floral kingdoms in the world, primarily due to its high number of endemic species and biodiversity. At only 90 000km$^2$, the CFR supports more than 9000 species of which almost 70% are endemic, therefore representing one of the most diverse floras in the world (Goldblatt and Manning, 2000; Goldblatt et al., 2005). The site is in the fynbos biome, one of the world's most threatened biomes due to increasing anthropogenic pressures.

The Terrestrial Biodiversity Network (2024) as seen in Figure 3-5 does not select the site or its surroundings as critical biodiversity areas (CBA) or ecological support areas (ESA).

The DFFE National Screening Tool Report **(Appendix B)** identified the Granger Bay precinct site as being of very high sensitivity due to the historical (pre-development) presence of the critically endangered Peninsula Shale Renosterveld (PSR) on site. PSR is a unique vegetation type that is endemic to Cape Town and was historically centred in the city bowl, but has since been reduced significantly. This vegetation type is now only found on the lower northern slopes of Devils Peak, Table Mountain and Signal Hill, where it is conserved as a part of the Table Mountain National Park. Noteworthy threats to PSR include mismanagement (mowing and fire protection) and alien plant invasion. Although the conservation target is 26%, only around 13% of PSR remains (Rebelo et al., 2006; Cowan and Anderson, 2014).

The protocol for the assessment and reporting stipulates that a very high sensitivity rating for terrestrial sensitivity requires an assessment report. Although Peninsula Shale Renosterveld was historically present on the proposed site, it is no longer present due to anthropogenic development and site transformation. Therefore, terrestrial sensitivity is not very high, and a terrestrial sensitivity impact assessment is not required **(Appendix C)**.

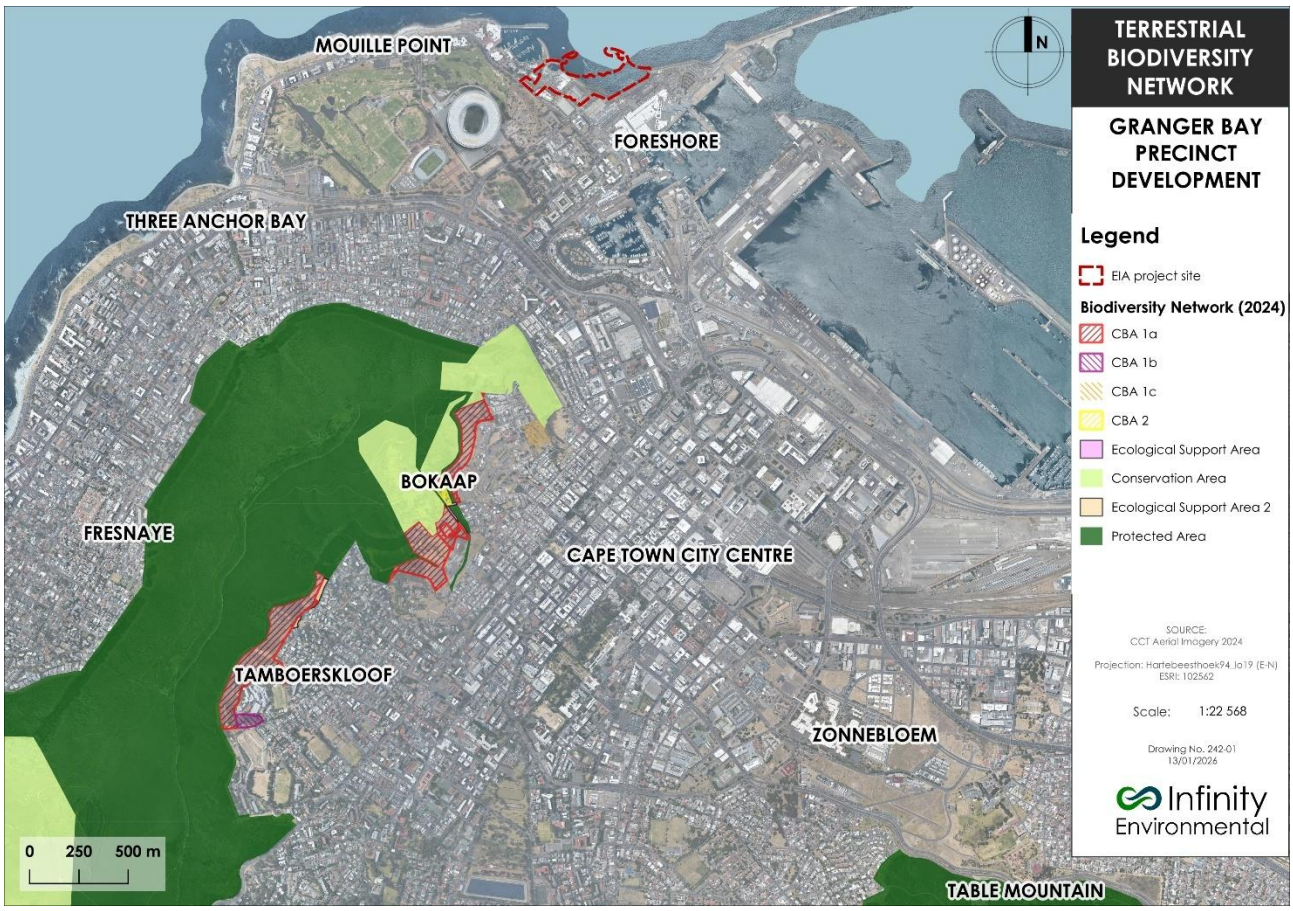



**Figure 3-5: Terrestrial Biodiversity Network (2024)**

### 3.3.5 Oceanography

Table Bay, a relatively shallow bay with a maximum depth of 35 m, is located in the southern Benguela current ecosystem (Carter, 2006; WML Coast, 2025), that encompasses Robben Island and the coastline from Mouille Point to Bloubergstrand, which includes the Port of Cape Town and the proposed site in the Granger Bay precinct (Figure 3-6). The seabed mainly consists of exposed bedrock, with thin layers of sand (Van Ballegooyen et al., 2006).

The Benguela system is mainly influenced by the wind-driven upwelling of deep nutrient-rich water close to the coast, thus strongly influencing both water temperature and nutrient concentration and subsequently, primary production. Upwelling cells in the southern Benguela system are located off the Cape Peninsula and Cape Columbine. This upwelling region is one of the world's most productive systems, supporting rich fishing grounds and attracting large colonies of sea birds and seals (Harris et al., 2019; Branch & Griffiths, 1988).

Currents in the bay are predominantly wind-driven, with minor influences from tidal forcing. In the summer, the strong south-easterly winds drive a northward, anti-clockwise circulation in Table Bay with a surface flow of 0.2-0.3 m/s (Quick & Roberts, 1993) which results in upwelling. Conversely, the predominantly north/north-westerly winds in winter produce clockwise circulation (Daniels et al., 2022), bringing large swells and storm events from the Southern Ocean (Figure 3-7). However, currents in the port are driven by tidal fluctuations with a slight influence from wind-driven forces and minor wave action due to the protection of the Port of Cape Town's main breakwater (Diedericks & Smit, 2013).

Tides in the Port of Cape Town are generally weak and semi-diurnal with maximum and minimum tides of 2 m and 1m respectively (Diedericks & Smit, 2013), although in situ variations can be up to 0.5 m from the predictions due to meteorological conditions. Localised currents may also influence navigation and deposition in the Port.

During summer months, the water temperature in Table Bay can range from 9°C to 13°C when upwelling occurs, but as solar radiation heats the water's surface, the water column becomes highly stratified. However, during periods of relaxed upwelling, water temperatures can increase rapidly to above 20°C (Monterio, 1997). In winter months, storms cause vertical mixing in the water column, therefore producing water temperatures of 14°C to 16°C (CSIR, 2016). Water temperatures within the port are similar to that of Table Bay. Table Bay experiences a salinity of 34.7 practical salinity units (PSU) to 35.3 PSU, with lower salinity values near Diep and Salt River mouths, especially during winter months (CSIR, 2016).

The DFFE National Screening Tool Report identified an Oceanographic Impact Assessment to be conducted based on the selected classification of the report (any activity in an estuary, on the seashore, in the littoral active zone, or in the sea). Based on these recommendations, WML Coast has provided a draft Oceanographic Impact Assessment. The hydrodynamic modelling conducted by PRDW (**Appendix G**) is still applicable to the proposed development and has been interpreted in the draft Oceanographic Impact Assessment by WML Coast (2025 – **Appendix D1**). A Climate Change Impact Assessment will be conducted by SRK Consulting to ensure climate change-related risks are assessed and avoided where possible.

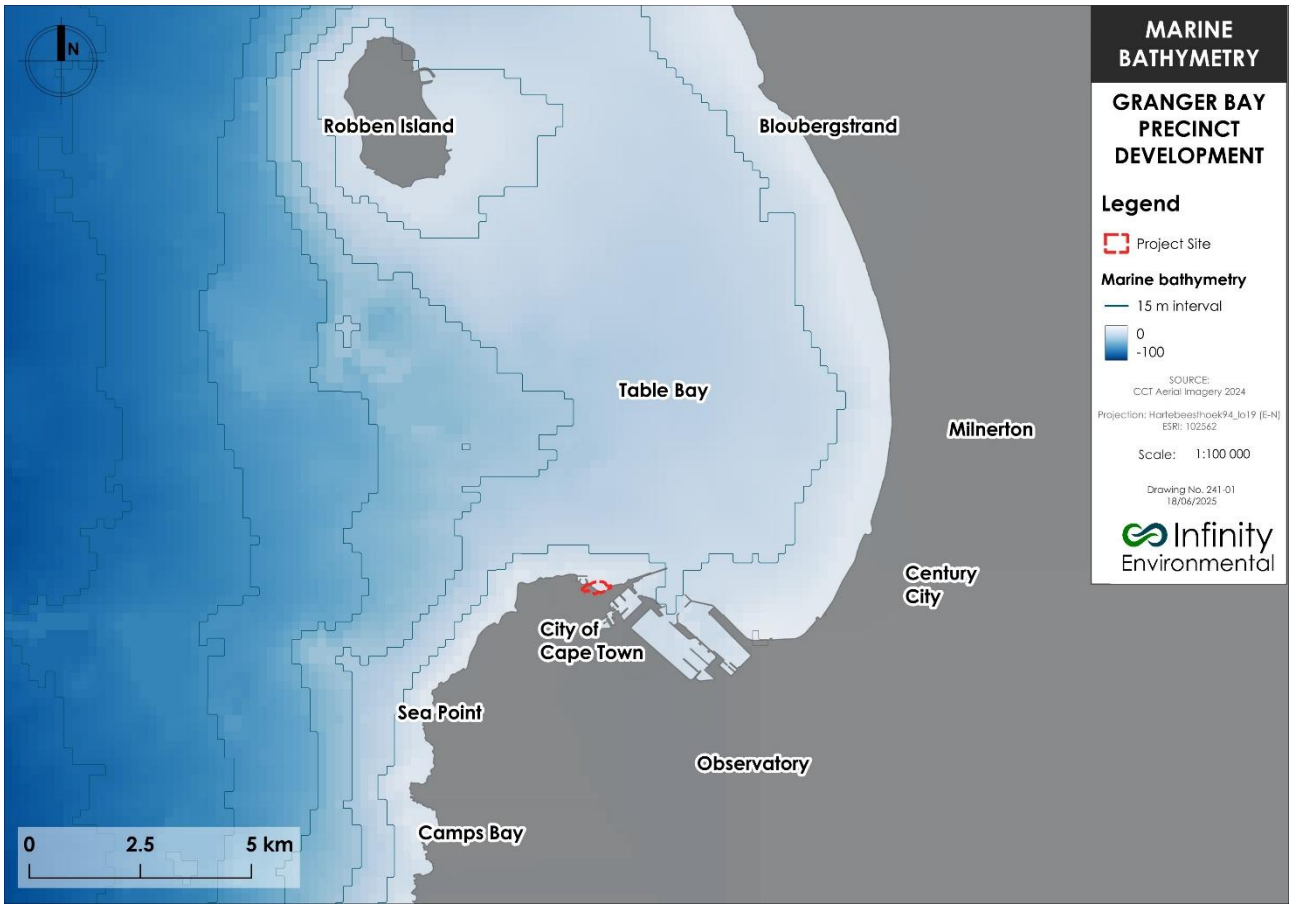



**Figure 3-6: Bathymetry map**

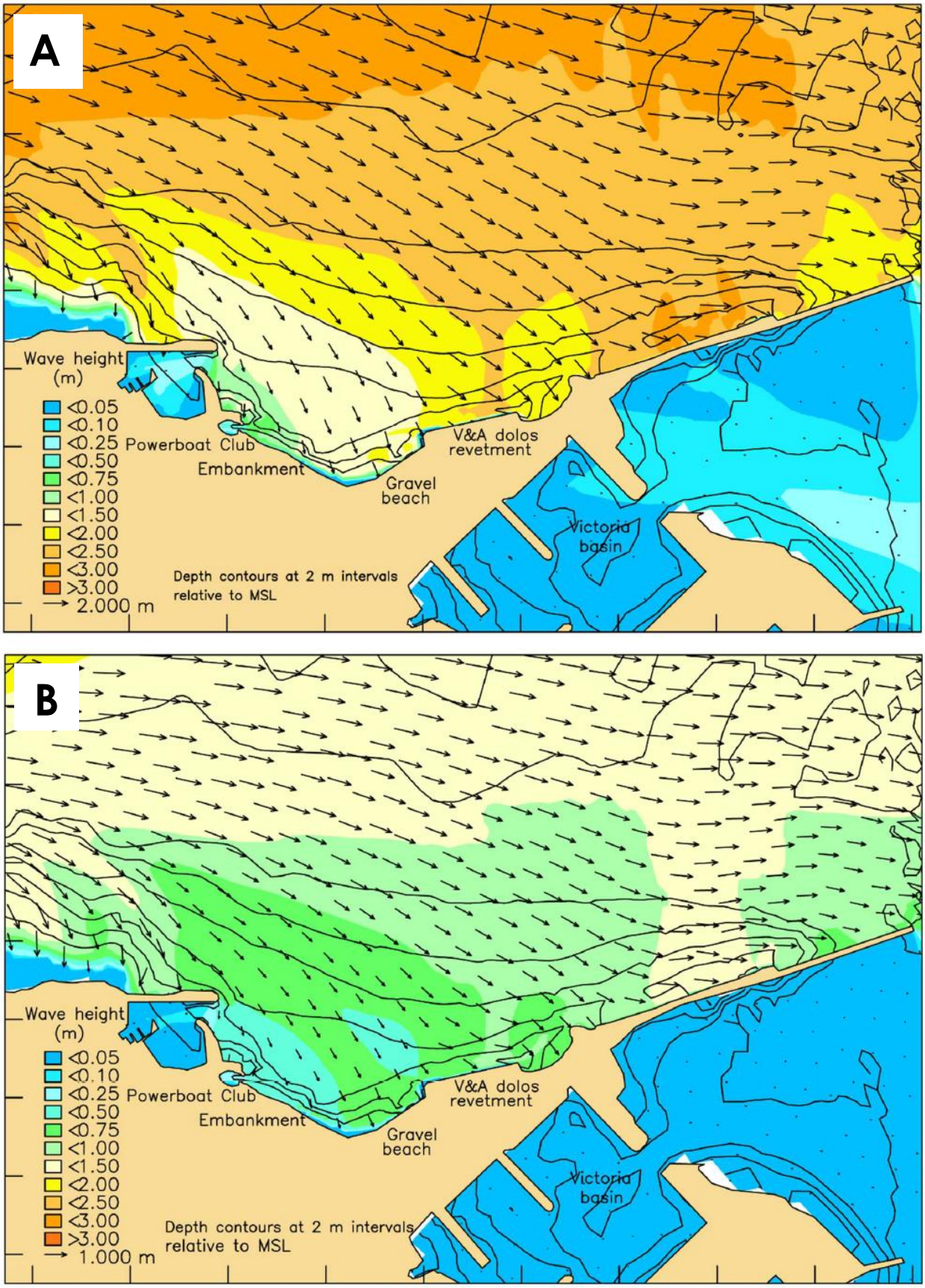



**Figure 3-7: An example of the significant wave heights and mean wave directions in Granger Bay for an offshore condition with significant wave height = 5m, Peak wave period = 12.5s and mean wave direction = southwest (A) and west (B).**

### 3.3.6 Marine Environment and Biodiversity

The marine environment in Granger Bay has been impacted by extensive development and urbanisation, with the majority of the eastern shore being reclaimed. The eastern shore is currently protected by a dolos revetment, which provides an artificial rocky shore habitat for marine organisms such as the invasive mussel (*Mytilus galloprovincialis*), the west coast rock lobster (*Jasus lalandii*), kelp (*Ecklonia maxima*), pink coralline algae and grazing patellid limpets. The coast in the centre of Granger Bay contains a temporary rock revetment and steep gravel beach, which is subjected to wave abrasion. The western shoreline of Granger Bay also consists of artificial structures, including a sheltered boat launch site managed by the Oceana Power Boat Club, the Granger Bay Marina and a rubble embankment (Wright, Laird and Clark, 2018; Wright, Jackson and Rees, 2025).

Table Bay water quality is considered to be good, mainly due to limited sources of direct pollution and contaminants, although water quality in the Port of Cape Town is impacted by stormwater outflows, metal accumulation, faecal contamination and high concentrations of microplastics. There is also direct contamination into the Bay from the Green Point wastewater outfall (Wright, Jackson and Rees, 2025).

The DFFE National Screening Tool Report identified a Marine Impact Assessment to be conducted based on the selected classification of the report (any activity in an estuary, on the seashore, in the littoral active zone, or in the sea). Based on these recommendations, Anchor Environmental Consulting has provided a draft Marine Impact Assessment and Sea Search Africa has provided a draft Marine Mammal Specialist report (Jackson and Rees, 2025).

#### 3.3.6.1 Marine Ecosystems

The marine biogeographic patterns around the coast of South Africa were more recently mapped by Sink et al. (2012), whereby new ecoregions were defined. According to the divisions, Table Bay falls into the cool temperate west coast area, in the Southwestern Cape inshore region.

The Southern Benguela Ecoregion, in which the Southwestern Cape inshore falls, is the most productive ecoregion in South Africa (Harris et al., 2019). This is primarily due to upwelling that provides nutrients and enhances biological productivity, thus supplying food for diverse fauna, including pelagic and demersal fish (anchovy and hake, respectively); nearshore fisheries (abalone); mammals (seals); and seabirds (penguins). Additionally, sheltered bays such as Table Bay are essential in temperate marine environments as they provide relative warmth and sheltered areas which increase primary production, thereby supporting complex food webs (Harris et al., 2019).

The proposed site consists of two marine ecosystems, the Cape Kelp Forest and Cape Mixed Shore (Figure 3-8). The marine ecosystem types that may be directly or indirectly affected during the proposed development and reclamation include:

- The Cape Bay
- Cape Kelp Forest
- Cape Mixed Shore
- Artificial surfaces of the harbour


**Figure 3-8: Marine Ecosystems Map (2018)**

#### 3.3.6.1.1 Cape Bay

The Cape Bay ecosystem is an open pelagic system with pelagic communities (Table 3-4) typical of those found throughout the southern Benguela ecosystems (Carter, 2006; Carter et al., 2003). Very little information on pelagic communities in the Cape Town Port has been published, although Cape fur seals, euphausiids, mullet and box-jellyfish are often observed in the port, with vagrant dolphins periodically observed in the port (Wright et al., 2025).

Marine mammals are often sighted in Table Bay for breeding, feeding and shelter from heavy swell (Barendse *et al.*, 2011). Common marine mammals observed in Table Bay include Humpback whales (*Megaptera novaeangliae australis*), Southern right whales (*Eubalaena australis*), Bryde's whale (*Balaenoptera edeni brydei*), Killer whales (*Orcinus orca*), Common dolphins (*Delphinus delphis*), African dusky dolphins (*Lagenorhynchus obscurus obscurus*) and Heaviside's dolphin (*Cephalorhynchus heavisidii*) (Table 3-5).

Cape fur seals are also often spotted in Table Bay, although there is no breeding colony in the bay (Huisamen et al., 2011). Other less common mammals observed in Table Bay are the Subantarctic fur seal (*Arctocephalus tropicalisa),* Leopard seal *(Hydrurga leptonyx),* Southern elephant seal *(Mirounga leonia),* and the Cape clawless otter *(Aonyx capensis)*.

**Table 3-4: Table Bay pelagic community composition (Carter, 2006)**

| Group | | Genera |
|---|---|---|
| Phytoplankton | Diatoms | *Chaetoceros, Nitschia, Thalassiosira, Skeletonema, Rhizoselenia, Coscinodiscus, and Asterionella* |
| | Dinoflagellates | *Prorocentrum, Tripos* and *Peridinium* |
| | Harmful algal species | *Tripos furca, T. lineatus, Prorocentrum micans, Dinophysis sp., Noctiluca scintillans, Alexandrium tamarense, G. polygramma, Alexandrium catanella* and *Mesodinium rubrum* |
| Zooplankton | Copepods | Centropages, Calanoides, Metridia, Nannocalanus, Paracalanus, Ctenocalanus and Oithona |
| | Euphausiids | - |
| | Fish eggs or larvae | *Engraulis capensis, Sardinops sagax, Merluccius sp.* and *Trachurus sp.* |
| Fish | Nearshore | *Chelon richardsonii, Atherina breviceps, Rhabdosargus globiceps, Clinus latipennis, Psammogobius knysnaensis* and *Caffrogobius nudiceps* |
| | Offshore | *Thyrsites atun, Pachymetopon blochil, Thunnus alalunga,* and *Scomber japonicas* |

**Table 3-5: Marine mammals of Table Bay (Elwen, 2025 and Wright et al., 2025)**

| Suborder | Common name | Species | IUCN Listing (IUCN 2025) | Encounter frequency |
|---|---|---|---|---|
| Mysticeti (Baleen whales) | Humpback whales | *Megaptera novaeangliae australis* | Least Concern (*M. novaeangliae*) | Year-round at some level, with feeding peaks and likely daily presence during Nov-Feb |
| | Southern right whales | *Eubalaena australis* | Least Concern | Year-round with peaks in Jul-Sep (breeding) and Feb-April (feeding) |
| | Bryde's whale | *Balaenoptera edeni brydei* | Least Concern | Monthly, peak in winter-spring, mainly Aug-Oct |
| Odontoceti (Toothed whales) | Killer whales | *Orcinus orca* | Data Deficient | <5 times per year |
| | Common dolphins | *Delphinus delphis* | Least Concern | Monthly, summer peak |
| | African dusky dolphins | *Lagenorhynchus obscurus obscurus* | Data Deficient | Daily |
| | Heaviside's dolphin | *Cephalorhynchus heavisidii* | **Near Threatened** | Daily |

#### 3.3.6.1.2 Cape Kelp Forest

Upwelling along the west coast of South Africa allows for the growth of *Ecklonia maxima* and *Laminaria pallida,* which dominate kelp forests as well as the algae *Macrocystis pyrifera,* which dominates more sheltered areas (Branch and Griffiths, 1998). There are large faunal communities inhabiting kelp forests, including carnivores (crabs, rock lobsters, sea stars, whelks and anemones), grazers (sea urchins, limpets, abalone, isopods and amphipods), and fish (hottentot seabream, red-finger, two tone finger-fin, galjoen and various klipfish) (Carter et al., 2003). These ecosystems are of great importance because they provide essential ecosystem services, including protection against coastal erosion, commercial and subsistence fishing, ecotourism and provide ecological services such as habitat provision and nursery areas (Blamey and Bolton, 2018).

Ecological reef surveys were conducted in April 2024 at ten sites within Granger Bay using photo-quadrats and video transects to provide a description of the reef community present within the Bay (Figure 3-9; Dawson et al., 2024). Results from the survey included 80 species, whereby diversity within the bay was fairly consistent, ranging from a minimum of 42 taxa to a maximum of 53 taxa, with nine species recorded from every site. The reef communities were comprised of 64% of marine animals and 36% of marine plants (Dawson et al., 2024). The reef communities were found to be fairly homogenous across the bay with slight variations due to environmental variations (Dawson et al., 2024).

**Figure 3-9: Example of a photo-quadrant on reef communities (left) and video transects (right) (Wright et al., 2025)**

#### 3.3.6.1.3 Cape Mixed Shore

Sandy and rocky habitat characterise the Cape Mixed Shore ecosystem, with the ecology similar to that of the great West Coast region (McQuaid et al., 1985, Branch & Griffiths 1988). The rocky shore habitat in Table Bay is heavily invaded by the Mediterranean mussel (*Mytilus galloprovincialis*), whereas the benthic habitats are dominated by polychaetes, nematodes and amphipods (CSIR, 2016; Wright et al., 2019).

These benthic communities are impacted by both environmental changes (e.g., sediment granulometry, salinity and particulate organic matter) and anthropogenic activities (e.g. habitat modification and pollution). However, long-term monitoring indicates that there is a higher abundance of pollution-tolerant benthic taxa, rather than disturbance-tolerant benthic taxa in the Port of Cape (CSIR, 2017b), with macrofaunal communities in the port being classified as either fair or poor (CSIR, 2016). A baseline survey by Dawson et al., (2024) in Granger Bay and Table Bay identified 72 benthic macroinfauna, where there was a slightly higher abundance of macroinfauna being identified in Table Bay compared to Table Bay likely due to the difference in environmental factors including wave action and total organic content (Dawson et al., 2024; Wright et al., 2025). Species diversity was similar between the bays, with a slightly lower diversity in Granger Bay compared to Table Bay (Dawson et al., 2024).

#### 3.3.6.1.4 Artificial surfaces of the Harbour

The ecology of the hard surfaces of the Port of Cape Town is expected "to resemble an impoverished version of a sheltered rocky shore typical to the south-western Cape Bioregion" (Quick & Roberts

1993). Nonetheless, the fouling community, including sea squirts, tunicates, amphipods, klipfish, crabs and small lobsters, inhabiting the hard structures of the harbour is reported to be diverse and well-developed (Carter et al., 2003; Anchor Environmental Consulting, 2013).

The vertical harbour walls outside of the port also host large numbers of juvenile West Coast rock lobster *Jasus lalandi*, encrusting corallines, the barnacle *Notomegabalanus algicola*, the sea urchin *Parechinus angulosus* and the ribbed mussel, *A. ater* (Mayfield 1998, Hazell et al., 2002, Carter et al., 2003). In contrast to the rocky substrata of the broader Table Bay, there is a relatively low cover of mussels on these artificial surfaces, and an unusually high cover of encrusting corallines (Carter et al., 2003).

Field surveys undertaken in February 2018 indicate that the dolosse of Table Bay breakwater are a highly heterogeneous habitat (Wright et al., 2018), with West Coast rock lobster, crabs and urchins living among the mussels, kelp and red bait on the dolosse. Environmental heterogeneity is an important factor in determining community structure, and there is widespread evidence showing a positive relationship between species richness and environmental heterogeneity (Yang et al., 2015).

#### 3.3.6.2 Human uses and influences on the marine environment

Table Bay provides a significant number of ecosystem, economic and industrial services, most importantly, the Port of Cape Town, which is a key node for regional and international shipping maritime trade, is located in Table Bay (Carter, 2006). Moreover, various shipping fleets operate from the port, with processing and export activities occurring adjacent to the port (Wright et al., 2025). Seawater from the port is also used for cooling of the Clocktower Precinct, and Victoria Basin seawater is utilised for the Two Oceans Aquarium exhibits (Anchor Environmental Consulting, 2013). Table Bay also supports a thriving recreational boating community, as well as attracting local and international tourists to the area for SCUBA diving, snorkelling, walking and bird watching (Table 3-6).

**Table 3-6: Human uses of Table Bay (Adapted from Carter, 2006; Van Ballegooyen, 2007)**

| Use | Description |
|---|---|
| Shipping | The predominant use of the Bay, both container and cruise, i.e. vessel navigation areas and anchorages |
| Commercial fishing | Boat-based line fishery for snoek, hottentot and tunas in and adjacent to Table Bay. Prior to the closure of the fishery, abalone was dived for in the shallow rocky subtidal zone south of Mouille Point and around Robben Island |
| Recreational fishing | For consumption and bait on beaches from Milnerton to Blouberg |
| Industrial | Marine sewage outfalls (the Green Point pipeline and the Chevron/Caltex pipeline); industrial cooling water use at the Koeberg power station; used and disused sea cables (Schoonees, 2006) with landfalls at Milnerton and Melkbosstrand, and from Granger Bay Marina and Murrays Harbour and the Port of Cape Town |
| Nature conservation | Table Mountain National Park (TMNP) manages a 'multi-use' Marine Protected Area (MPA) from Mouille Point, 14 km offshore, and south to Cape Point. Commercial and recreational fishing is allowed within the boundaries of the MPA, but there are 'no take' sanctuaries where fishing is prohibited. Table Bay is also a rock lobster sanctuary. Robben Island and surrounding areas are also a zoned MPA. |
| Recreation | Water sports such as yachting, kayaking, wind and kite surfing, surfing, diving, swimming and whale watching, as well as general beach and coastal recreation |

#### 3.3.6.3 Marine Protected Areas

Marine Protected Areas (MPAs) are essential because they enhance the resilience of an ecosystem to threats, including climate change and other stress factors. There are two types of MPA zones, namely the restricted areas (no-take zones) and controlled areas (not a no-take zone but has certain restrictions). MPAs are protected in terms of the Protected Areas Act (Act No. 57 of 2003), which

states that no person may conduct commercial prospecting or mining, exploration, production or related activities in a protected environment without the written permission of the Minister and the Cabinet member responsible for minerals and energy affairs.

A MPA, specifically the Robben Island Marine Protected Area, is located west of the site (Figure 3-10) and is classified as a controlled zone, which refers to areas that are protected but that allow certain human activities (i.e. spearfishing, angling, etc.) with permission. However, there is no overlap with the proposed development (Wright et al., 2025).

The entirety of Table Bay falls within a rock lobster sanctuary (Figure 3-11) and thus no West Coast rock lobster (*J. lalandi*) may be caught, either recreationally or commercially, in Table Bay due to overexploitation. The outer harbour wall of the Port of Cape Town and the subtidal rocky reefs at Mouille Point have been identified as nursery reefs for *J. lalandi* (Hazell et al., 2002).

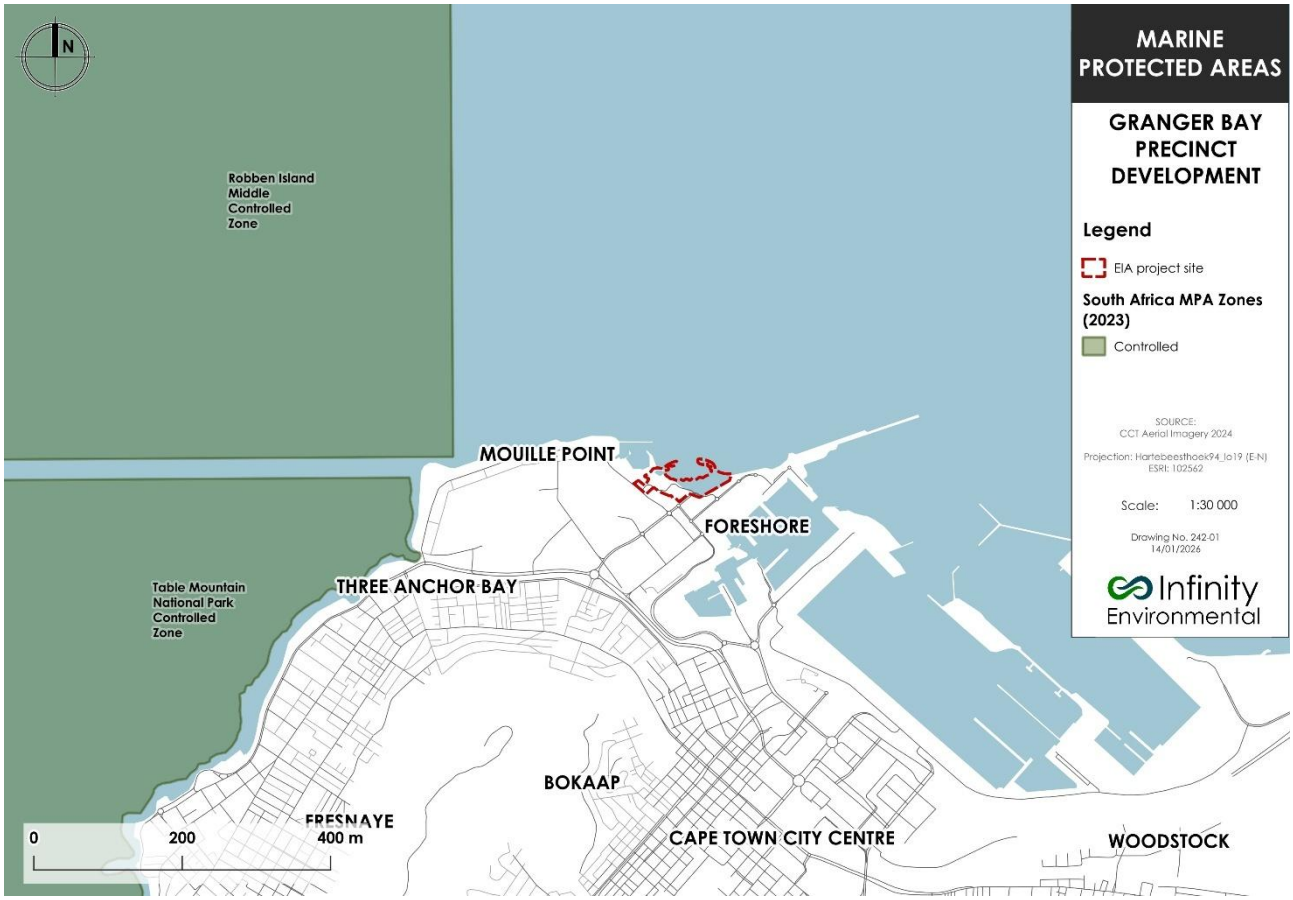



**Figure 3-10: Marine Protected Areas in Table Bay**

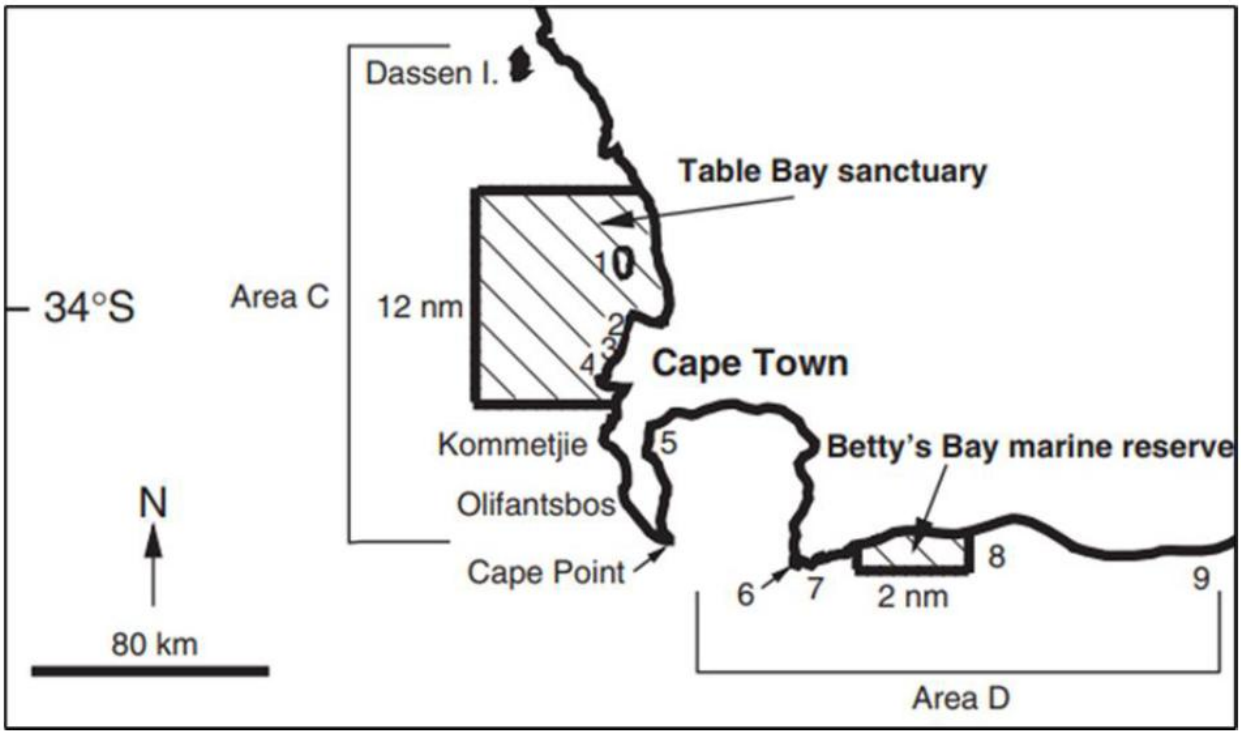



**Figure 3-11: The extent of the Table Bay rock lobster sanctuary (Mayfield et al., 2005)**

3.3.6.4 Ecosystem Threat Status

The Ecosystem Threat Status developed by the South African National Biodiversity Institute (SANBI, 2018) indicates how threatened ecosystems are, specifically the degree to which ecosystems are still intact or alternatively losing vital aspects of their structure, function, or composition (Harris et al., 2019; Wright et al., 2025).

Ecosystem threat types are categorised as "Critically Endangered", "Endangered", "Vulnerable", "Near Threatened" or "Least Concern", based on the proportion of the original extent of each ecosystem type that remains in good ecological condition relative to a series of biodiversity thresholds. The habitat threat status of the proposed area of development in Granger Bay is "Vulnerable" (Figure 3-12).

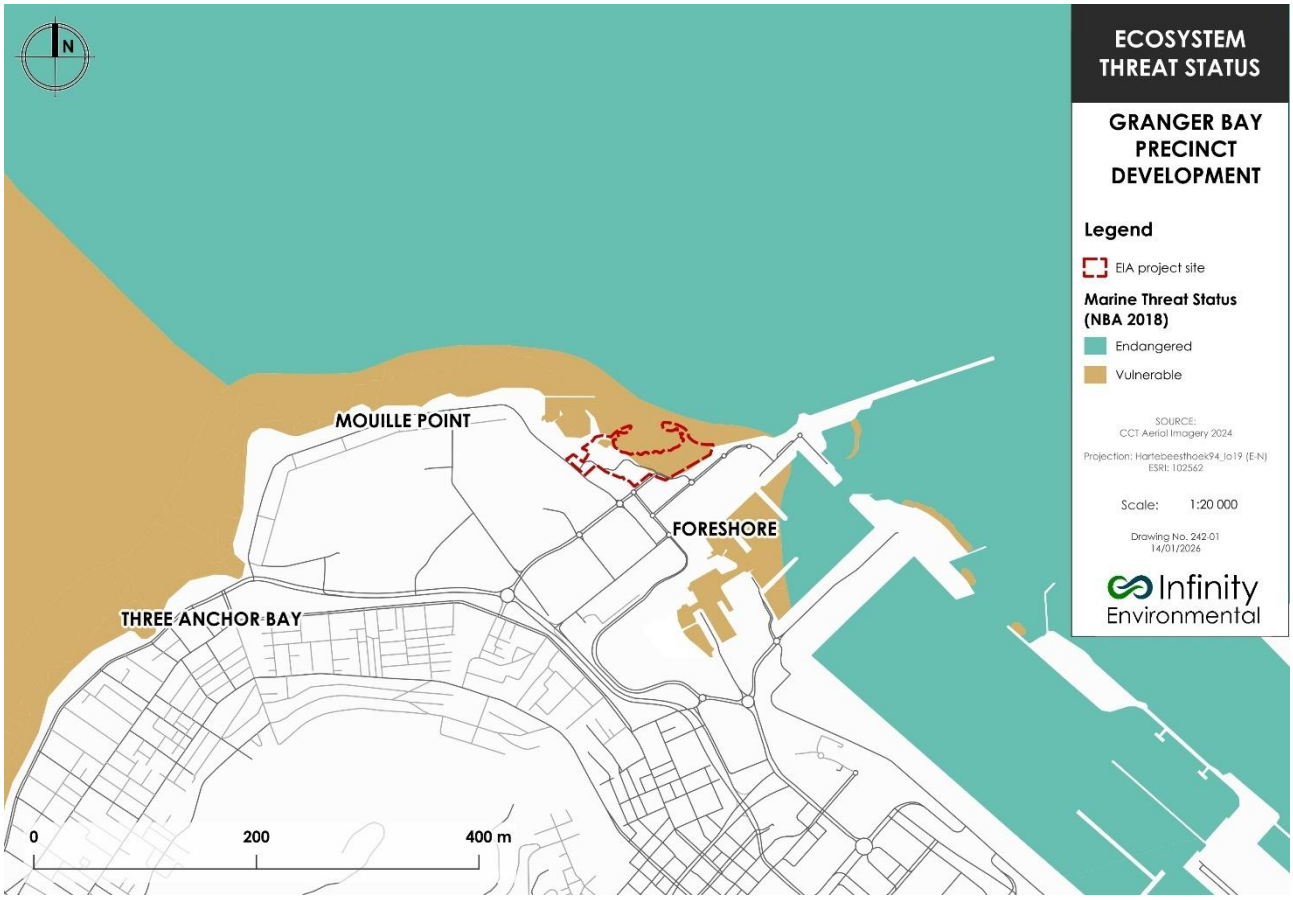



**Figure 3-12: Ecosystem Threat Status according to the National Biodiversity Assessment (Sink et al., 2019)**

3.3.6.5 Critical Biodiversity Areas and Ecological Support Areas

Critical Biodiversity Area (CBA) assessment provides a spatial plan for the natural environment and is designed to inform planning and decision-making in support of sustainable development. CBA maps are developed using the principles of systematic biodiversity planning*. These maps comprise three categories of biodiversity priority areas, namely Protected Areas, CBAs (called "Biodiversity Conservation/Restoration Areas" in the Marine sector plan for the Biodiversity Sector 2024) and Ecological Support Areas (ESAs) ("Biodiversity Impact Management Zones"), which are jointly important for the persistence of a viable representative sample of all ecosystem types and species, as well as the long-term ecological functioning and connectivity of the landscape or seascape as a whole.

CBA Natural sites have natural/near-natural ecological conditions, with the management objective of maintaining the sites in that natural/near-natural state. CBA Restore sites are in a moderately modified or poorer ecological condition, with the management objective to improve ecological condition and, in the long term, restore these sites to a natural/near-natural state, or as close to that state as possible. As a minimum in CBA Restore sites, further deterioration in ecological condition must be avoided, and options for future restoration must be maintained.

The ESAs include all portions of ESAs that are not already within MPAs or CBAs, and a 5 km buffer area around all MPAs (where these areas are not already CBAs or ESAs). Within ESAs, negative impacts of

* SANBI 2017, Proposed Approach to Spatial Development and Management for South Africa's Marine Planning Areas 2019, and the Biodiversity Marine Sector Plan 2024).

human activities on key biodiversity features are managed and minimised to maintain the features in at least a functional, semi-natural state and/or to allow the area to improve in ecological condition. The proposed site overlaps with an ESA at the western edge (by the Oceana Power Boat Club), but otherwise falls entirely outside of any CBA delineated areas (Figure 3-13).

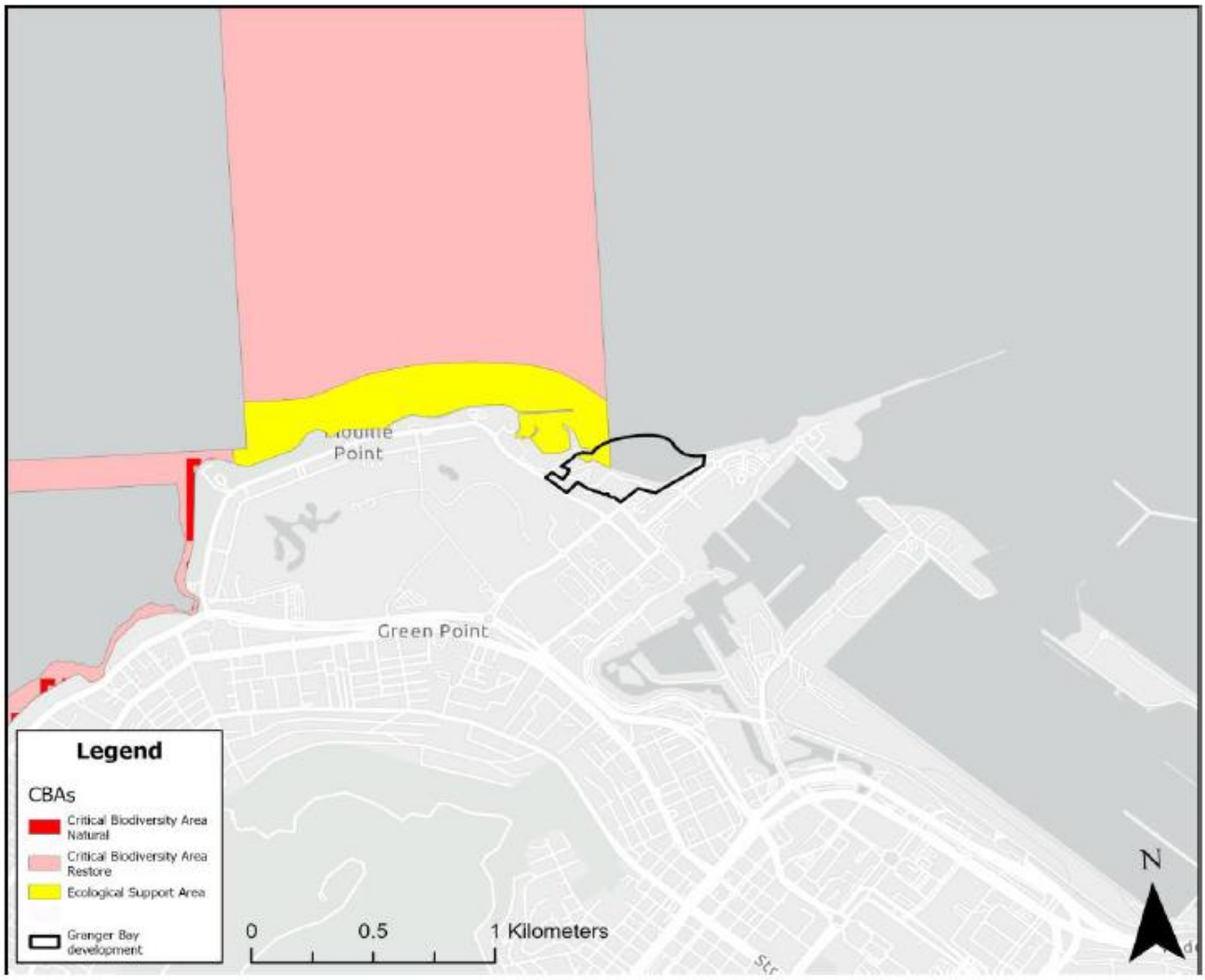



**Figure 3-13: Critical Biodiversity Areas and Ecological Support Areas**

## 3.4 Socio-Economic Environment

The DFFE National Screening Tool Report identified that a Socio-Economic Impact Assessment will be required based on the nature of the proposed development. As per these recommendations, Urban Econ prepared a draft Socio-Economic Impact Assessment report.

### 3.4.1 Socio-economic Profile of the Surrounding Wards

This site is locally significant from a socio-economic perspective. Using the 2011 census data, the site falls mostly within Ward 55, with a small portion in Ward 54, in Subcouncil 16 (Figure 3-14). Ward 55 contains Mouille Point, Three Anchor Bay, Green Point, Sea Point, and Fresnaye, and Ward 54 encompasses the suburbs of Foreshore, Woodstock, Salt River and Paarden Eiland. Adjacent to the proposed site, Ward 77 includes Bokaap, the City of Cape Town, Tamboerskloof, and Oranjezicht (Figure 3-14).

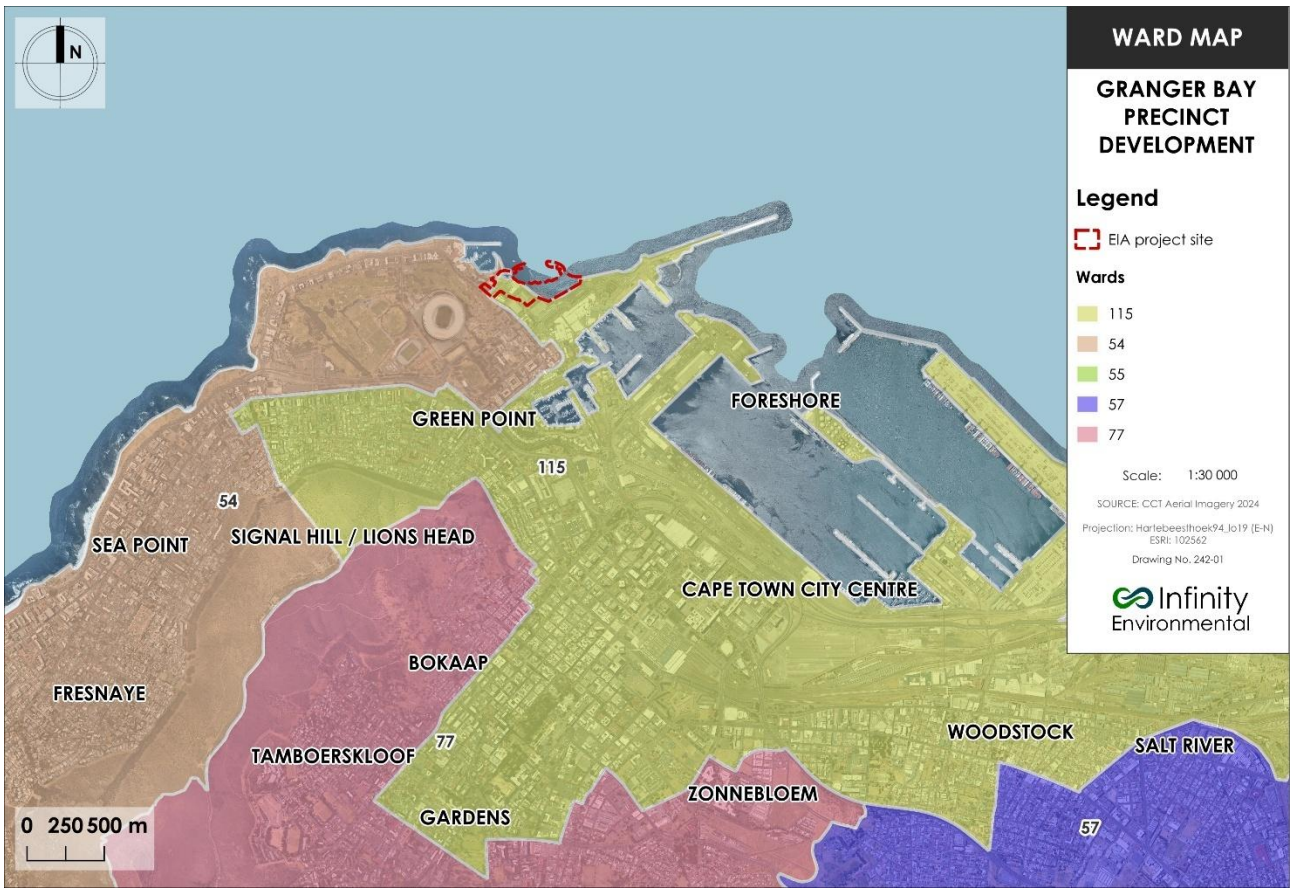



**Figure 3-14: Ward map (2011 data)**

3.4.1.1 Population

The population across Wards 54, 55, 57, and 77 totals over 161000 people, which indicates a dense local population in proximity to the proposed development. The combined household count across these wards exceeds 61000, highlighting a sizeable base for potential residential, retail, and hospitality demand (
Table 3-7).

Ward 55 has the highest population, 46072 people, with a relatively moderate household size of 3.0, suggesting a mix of family and non-family households. Ward 54, comprising higher-income suburbs like Sea Point and Fresnaye, has a smaller average household of 2.0 compared to Ward 55, which may reflect single-person or dual-income households with fewer dependents. This is an attractive demographic for luxury residential and lifestyle offerings (
Table 3-7).

**Table 3-7: Population and household (2024) (Urban-Econ, 2025)**

| Indicator | Western Cape | City of Cape Town | Ward 54 | Ward 55 | Ward 57 | Ward 77 |
|---|---|---|---|---|---|---|
| Population | 7 713 178 | 4 951 943 | 36 178 | 46 072 | 42 885 | 36 630 |
| Households | 2 149 543 | 1 400 243 | 17 762 | 15 285 | 13 590 | 14 857 |
| Average Household Size | 3.6 | 3.5 | 2.0 | 3.0 | 3.2 | 2.5 |

The highest percentage of the population is the economically active age group (15–64 years), ranging from 70.3% in Ward 55 to over 79% in Wards 57 and 77, which is notably higher than the provincial average of 70.6%. This suggests a strong labour pool and consumer base, thus reinforcing the economic potential of the area (Urban Econ, 2025).

Significantly, Ward 54 has a substantially higher proportion of elderly residents (21%) than the other wards and the provincial average, which may reflect its appeal to retirees due to its coastal amenities and upmarket housing. In contrast, Wards 54 and 77 have lower proportions of youth (8.2% and 8.8%, respectively), indicating limited numbers of dependent children (Urban Econ, 2025). These demographic patterns highlight a mature, economically engaged population with diverse lifestyle needs across the area (Figure 3-15).

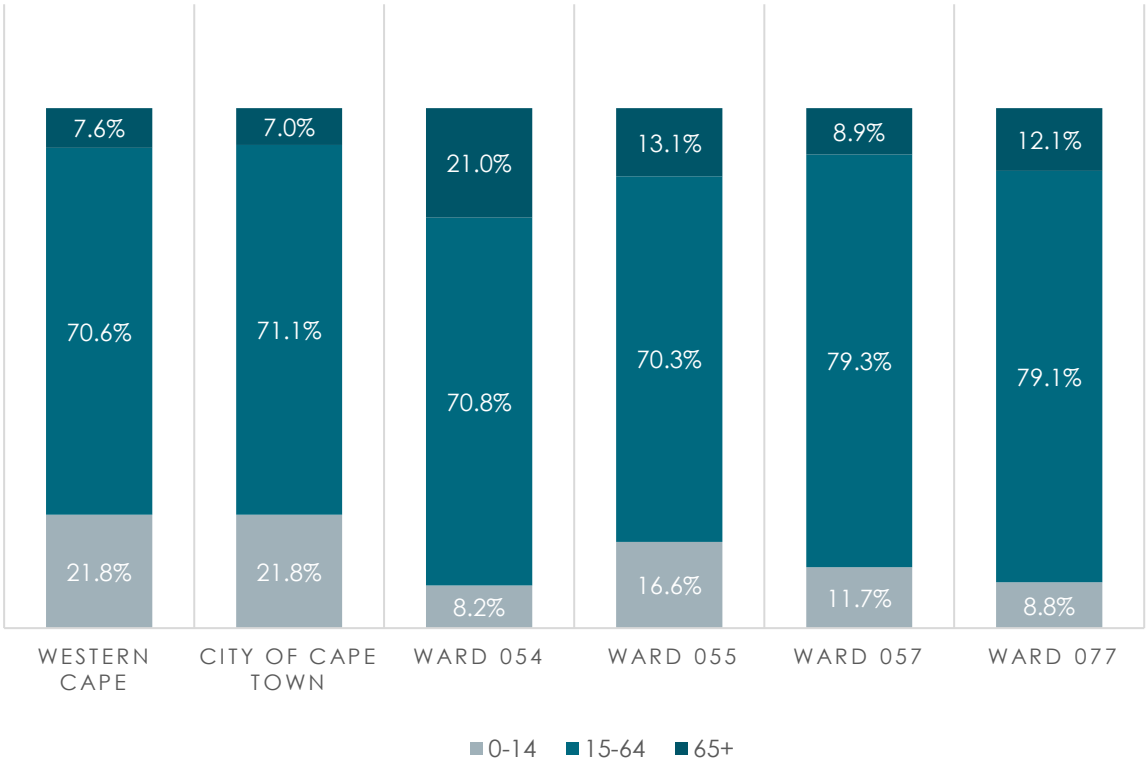



**Figure 3-15: Age profiles across the wards (Urban Econ, 2025)**

3.4.1.2 Education

The proportion of residents across all wards with no schooling is extremely low, well below the provincial and metropolitan averages. These statistics indicate broad access to basic education in these areas. The percentage of individuals who completed Grade 12 is also notably high in all wards, particularly in Ward 55 (42.8%) and Ward 57 (38.7%), suggesting a well-educated, employable population (Table 3-8; Urban Econ, 2025).

A key observation, however, is the high percentage of residents with higher education qualifications, 54.7% in Ward 54 and 61.7% in Ward 77, substantially exceeding the City of Cape Town average of 17.4% and the provincial average of 15.2%. This trend reflects the professional and affluent nature of these suburbs, which often attract highly skilled individuals and knowledge-based workers. Wards 55

and 57 also report strong levels of higher education at 27.1% and 42.9%, respectively, reinforcing the area's educated labour market (Table 3-8; Urban Econ, 2025).

**Table 3-8: Education profile (Urban Econ, 2025)**

| Aspect | Western Cape (%) | City of Cape Town (%) | Ward 54 (%) | Ward 55 (%) | Ward 57 (%) | Ward 77 (%) |
|---|---|---|---|---|---|---|
| No Schooling | 5.8 | 5.9 | 0.5 | 1.0 | 0.9 | 0.9 |
| Some Primary Education | 6.3 | 4.8 | 1.0 | 2.3 | 1.7 | 1.0 |
| Completed Primary | 3.9 | 3.2 | 0.7 | 1.7 | 1.4 | 0.9 |
| Some High School | 34.0 | 33.0 | 8.4 | 25.1 | 14.4 | 8.3 |
| Grade 12 | 34.7 | 35.7 | 34.7 | 42.8 | 38.7 | 27.2 |
| Higher | 15.2 | 17.4 | 54.7 | 27.1 | 42.9 | 61.7 |

#### 3.4.1.3 Employment

There is a significant difference between the provincial, municipal and ward-level contexts with regards to employment profiles. The Western Cape and the City of Cape Town report employment rates of 47.5% and 46.1%, respectively, with moderate unemployment rates of 13.3% and 15.1%, respectively. This suggests a relatively stable but still constrained labour market. The ward-level data conversely highlights distinct localised dynamics. Ward 54 stands out with the highest employment rate (48.7%) and the lowest unemployment rate (2.9%), despite having nearly half its population (48.3%) not economically active. This may reflect a more affluent or older demographic with reduced dependency on formal employment. Ward 55 displays a similar pattern, with moderate employment (44.2%), low unemployment (8.1%), and high levels of economic inactivity (47.7%).

Ward 57 presents a different profile, with the lowest employment rate (36.2%) and the highest share of economically inactive residents (58.2%). Although unemployment is relatively low at 5.5%, the limited labour force participation suggests structural barriers to employment, or a demographic skewed towards non-working-age groups. Ward 77 shows comparable trends, with 45.5% employed and only 3.3% unemployed, but more than half the population (51.2%) is not economically active. These figures indicate that while formal unemployment is not pronounced in some wards, economic inactivity remains a key consideration in understanding the local labour market (Figure 3-16; Urban Econ, 2025).

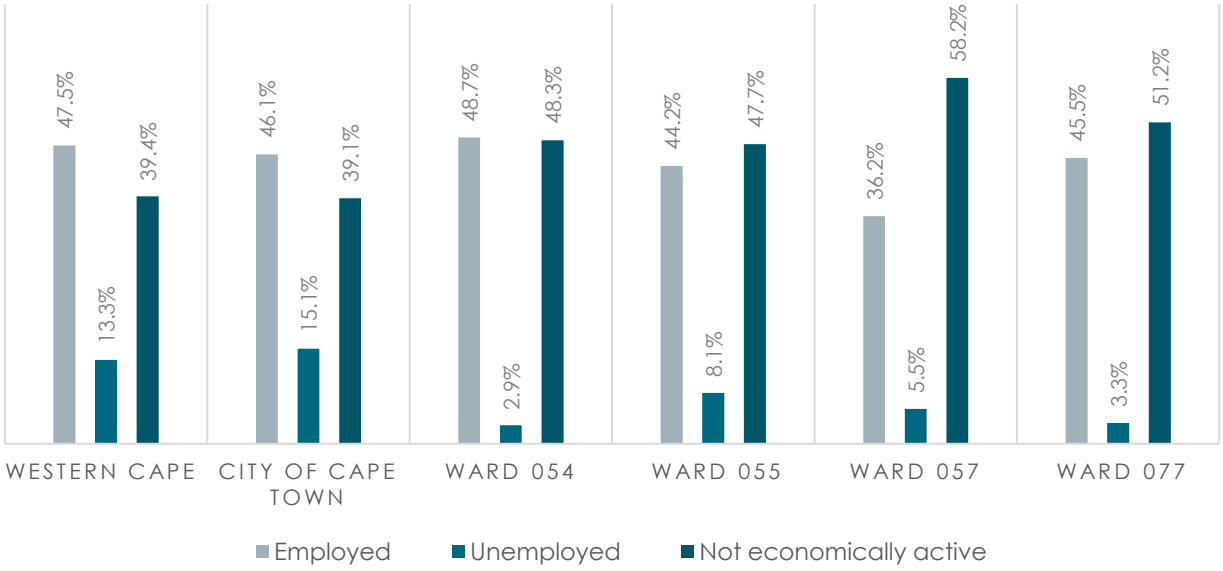



**Figure 3-16: Employment profile (Urban Econ, 2025)**

3.4.1.4 Skill level and employment sector

An analysis of the skills composition within the Western Cape and the City of Cape Town highlights a labour force that is predominantly semi-skilled. In the Western Cape, 44% of workers fall into the semi-skilled category, while in the City of Cape Town, this increases to 47.1%. Skilled workers make up 30% of the workforce in the province and 34% in the metro. This distribution suggests a regional economy that depends heavily on intermediate skills, likely reflective of dominant industries such as services, construction, and light manufacturing that demand practical, operational competencies (Figure 3-17; Urban Econ, 2025).

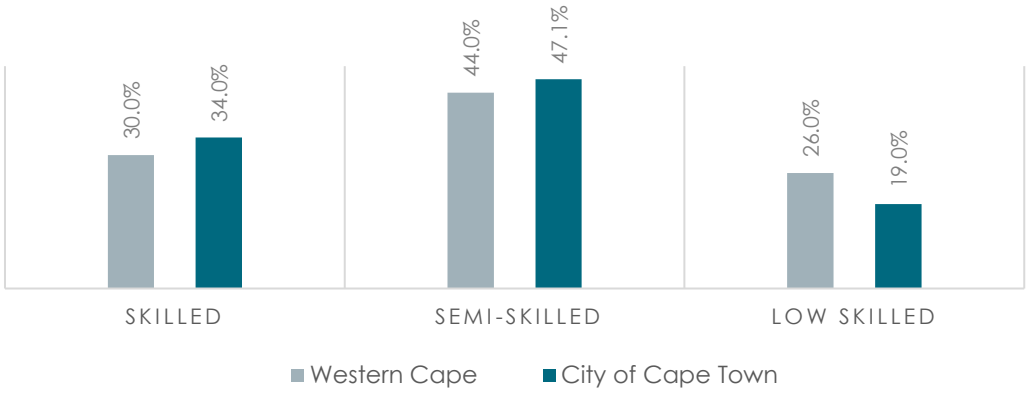



**Figure 3-17: Provincial and metropolitan skills level (Urban Econ, 2025)**

Across wards 55, 54. 57 and 77, the formal sector employment overwhelmingly dominates, with the formal employment ranging from 89.2% in Ward 55 to 94% in Ward 77, indicating a strong integration with Cape Town's structured economy. The informal sector, by contrast, remains marginal, comprising only 6–11% of employment across these wards, which suggests that most working residents are engaged in regulated, contract-based jobs, potentially with access to benefits and more stable income. This also reflects the urban character of the area, which is more likely to be serviced by formal businesses and institutions than by informal trading or casual labour markets (Figure 3-18; Urban Econ, 2025).

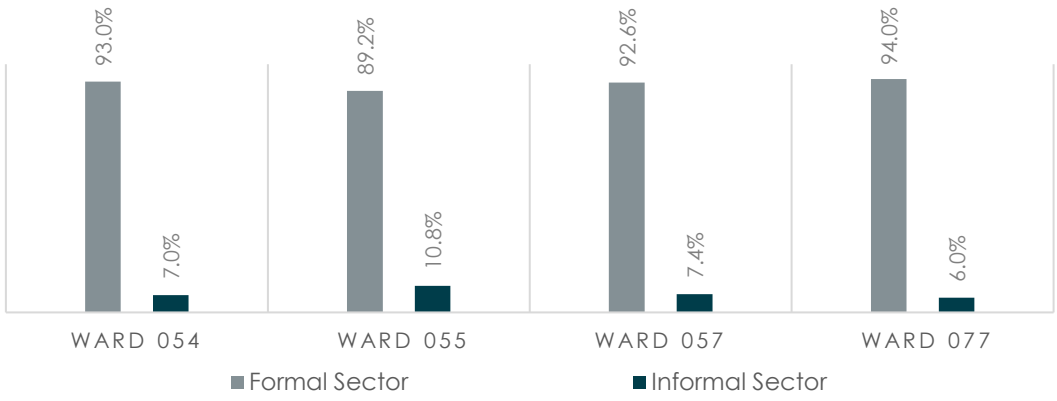



**Figure 3-18: Percentage of formal and informal employment across the wards (Urban Econ, 2025)**

3.4.1.5 Household income

Compared to the provincial and metropolitan averages, all four wards surrounding the development site show significantly lower proportions of low-income households and higher proportions of high-income households, with the exception of Ward 55, which shows a more balanced profile. This indicates that these wards are of considerable affluence, thus a strong concentration of wealth in coastal and inner-city suburbs (Table 3-9).

**Table 3-9: Household income (Urban Econ, 2025)**

| Income Category | Western Cape | City of Cape Town | Ward 54 | Ward 55 | Ward 57 | Ward 77 |
|---|---|---|---|---|---|---|
| **Low Income (R0- R71 977)** | 49.3% | 47.1% | 19.7% | 30.4% | 29.9% | 17.5% |
| **Medium Income (R71 978 – R575 819)** | 39.3% | 39.3% | 45.4% | 49.8% | 46.6% | 46.1% |
| **High Income (R575 820 – R4 606 551+)** | 11.4% | 13.6% | 34.9% | 19.8% | 23.5% | 36.4% |

3.4.1.6 Expenditure patterns

Household expenditure patterns provide insight into consumer behaviour and the types of goods and services most in demand. This informs the potential market opportunity for retail and service offerings in the area. Expenditure is typically divided into four broad categories:

- **Services** (e.g., transport, education, healthcare, banking, and telecommunications),
- **Non-durable goods** (e.g., food, beverages, fuel, and cleaning supplies),
- **Semi-durable goods** (e.g., clothing, footwear, household textiles), and
- **Durable goods** (e.g., appliances, furniture, vehicles).

Households in the City of Cape Town allocate the largest share of their expenditure to services, at 51.6%, slightly higher than the Western Cape average of 50.7%. This trend highlights the growing importance of service-oriented consumption in urban areas. Non-durable goods account for roughly one-third of household spending (32.4% in the City of Cape Town and 33.7% provincially), driven largely by the recurring need for essentials such as groceries and personal care items. Semi-durable goods, such as clothing and soft furnishings, make up a smaller portion of household spending at 7.1% across both geographic levels, while durable goods, higher-cost items like electronics, furniture, and vehicles, account for 8.9% in Cape Town and 8.5% in the Western Cape. These figures suggest

that although households are spending on long-term items, most expenditure is still geared towards ongoing service needs and everyday consumables (Urban Econ, 2025).

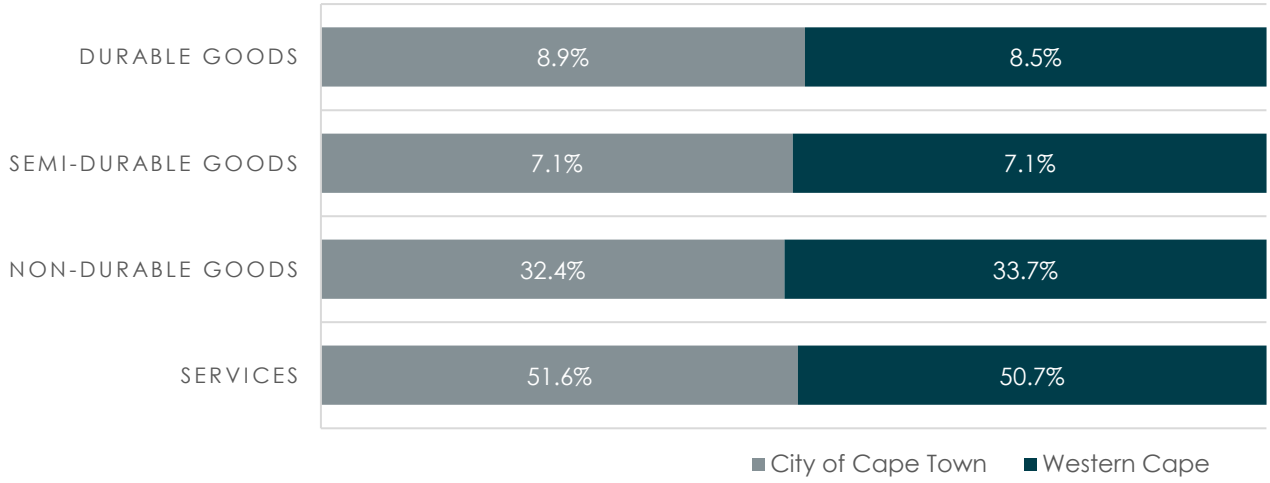



**Figure 3-19: Final consumption expenditure (Urban Econ, 2025)**

## 3.5 Heritage

The DFFE National Screening Tool Report identified that a Heritage Impact Assessment must be conducted based on the very high relative archaeological and cultural heritage theme sensitivity. A very high heritage sensitivity is due to the location of the site within 5km of a Grade I Heritage Site and 2km of a Grade II Heritage Site. In accordance with the National Screening Tool Report, a Heritage Impact Assessment, including archaeological, visual and cultural impact assessments, will be compiled by Cindy Postlethwayt and attached as an appendix to the EIA Report.

### 3.5.1 History of the Surrounding Area

The proposed site and surroundings have a long and significant history, with records dating back to before the 1600s. The Granger Bay Precinct is part of a stretch of coastal plain which once extended from Buitengracht to beyond Mouille Point, of which the Green Point Common represents the remaining part. Until the 19th century, the coastal plain was characterised by calcrete dunes, which were flattened during the late 19th and 20th centuries to make way for the Cape Town Harbour and related infrastructure. Fort Wynyard is located on the last surviving low dune. Beach Road, immediately to the south of the site, was located on the coastline, and land reclamation associated with Granger Bay Marina and the Water Club occurred during the 1980s and 1990s.

A brief history of the settlement and fortifications, development of the harbour and 20th century developments is summarised below (Figure 3-20).

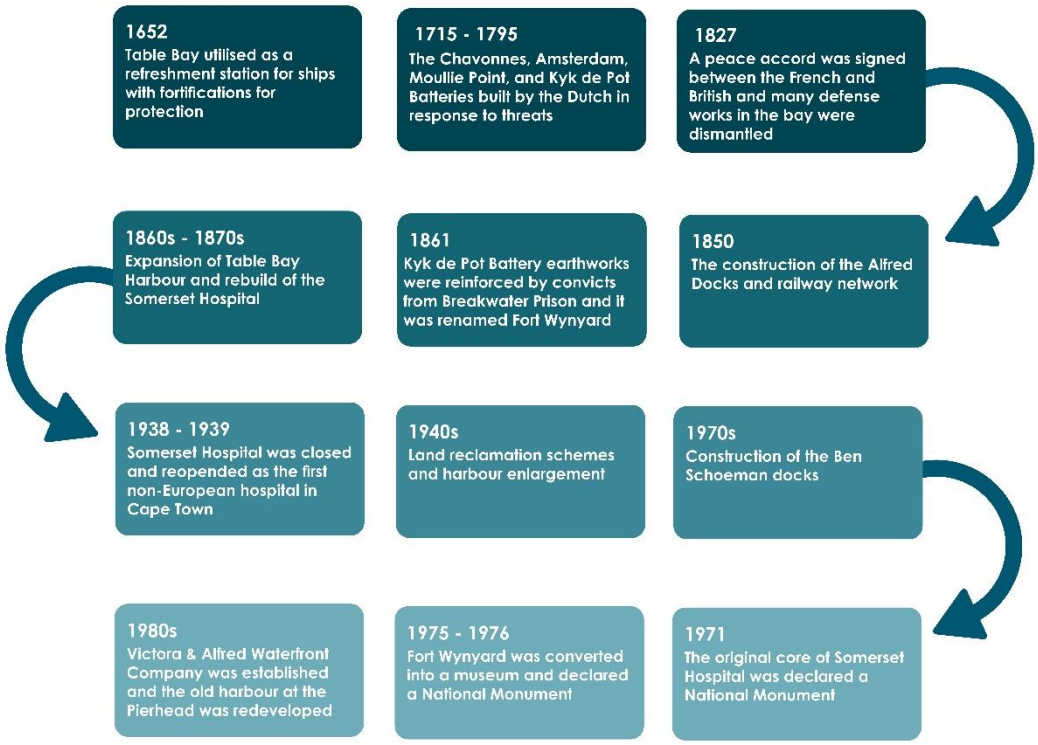



**Figure 3-20: Overview of the site history (Cindy Postlethwayt, 2025)**

**Settlement and Site Fortifications in the Granger Bay area**

- The area was seasonally inhabited by local Khoikhoi people who utilised the land as pastures for their cattle prior to European settlement.
- Portuguese explorers were the first Europeans to explore the region and settle in Table Bay in 1498. Although the bay was exposed and experienced unfavourable weather conditions, it was favoured due to the availability of freshwater.
- There is evidence that this small, protected bay was also used historically by a whale fishery, and the suggestion has been made that it may have been the site of Van Riebeeck's landing at the Cape – described in historic documents as somewhere on the "Lion's Tayle" - in 1652, although there is no hard evidence to support this.
- Table Bay became permanently settled in 1652 by the Dutch and was used by the VOC (Dutch East India Trading Company) ships as a refreshment station between Europe and the East. The Dutch protected the harbour with fortifications to protect against rival English and French trading companies during this period.
- In the 1700s, a number of batteries and defence lines were constructed along the coastline from Mouille Point to Fort Knokke (in the Foreshore area). These batteries were built to ensure the English and French could not occupy the Cape:
    - The Chavonnes Battery was built in 1715;
    - The Kyk in de Pot Battery (now known as Fort Wynward) was built in 1781; and
    - The Amsterdam and Mouille Point Batteries were built in 1787.
- The English landed in Blouberg in 1795, which led to the Battle of Muizenberg by the British against the Dutch Colony.

- The Dutch handed over the Cape Colony to the British in 1802, and the British began upgrading the military defences.
- The English constructed a second powder magazine behind Kyk in de Pot Battery in 1812.
- The original Somerset Hospital was built in 1818 and rebuilt to house 100 patients in 1862.
- All defences were dismantled in 1827 following a peace accord with the French but were rearmed when the American Civil War broke out in 1861.
- The Anglo-Boer War broke out in 1899 and lasted until 1902. Table Bay and Cape Town were used as transit points for the transport of soldiers and prisoners. Troops were held where the Green Point Common is now located.

**Harbour Development and Land Reclamation**

- The Chavonne's Battery was demolished for the construction of the Alfred Docks in 1850.
- In the 1970s, Table Bay Harbour Board acquired an additional land strip between the Amsterdam Battery and the Somerset Hospital for harbour expansion.
- In the second half of the 19th century, historic execution grounds and associated burial grounds were also destroyed for harbour expansion.
- Extensive land reclamation schemes were implemented after the Second World War in 1945 to enlarge the harbour.

**20th Century Development**

- The Amsterdam Battery was demolished in 1905 to construct a railway line linking Sea Point to the Harbour and the City.
- The original Somerset Hospital was closed in 1938 and reopened in 1948 as the first non-European hospital in Cape Town. The hospital was declared a National Monument in 1971 and is now protected under the National Heritage Resources Act.
- The Ben Schoeman docks were constructed in the 1970s.
- The old Victoria Basin Harbour was redeveloped in the 1980s when the Victoria & Alfred Waterfront Company was established. The Pierhead adjacent to the old harbour was also redeveloped during this time.

### 3.5.2 Heritage Resources

The NHRA gives a legal definition to the range and extent of what is considered to be South Africa's heritage resources. According to Section 2(xvi) of the Act, a heritage resource is "any place or object of cultural significance". This means the object or place has aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance. Establishing and grading for heritage significance is based on the three-tier grading system used in the NHRA and HWC's "Grading Implications & Management of HR HWC Guidelines April 2016".

#### 3.5.2.1 Visual and Landscape

The Granger Bay precinct site is located on a coastal platform, of which a section is reclaimed land, the original coastline running through the middle of the site. The site is heavily disturbed and has no natural rock outcrops or other significant landscape features. The existing unprotected coastal embankment consists of untidy, random fill material.

The position of the site on the waterfront, wedged between the V&A Waterfront and Fort Wynyard, adds to its visual significance. Moreover, the view cone from Fort Wynyard with the 'Arc of Fire' across Table Bay adds to the visual importance of the site. The historic Fort forms part of an old sequence of military sites, with views to Signal Hill, Robben Island and Blouberg, all of which formed part of the defence of Table Bay.

It is important to note that there have been previous agreements between the South African Heritage Resources Agency (SAHRA) and the Cape Town City Council regarding the strategic views from the gun placements of Fort Wynyard. It was agreed that two viewing planes must be kept, namely the view of Robben Island and the view extending from Granger Bay to Table Bay. Therefore, height restrictions of 5 stories were put into place. Additional information regarding the proposed development design is in Chapter 4.


**Photograph 3-13: View of Signal Hill and the Cape Town DHL Stadium from the Oceana Power Boat Club**

3.5.2.2 Heritage resources in the immediate vicinity of the site

There are resources of provincial and local heritage significance surrounding the site (Figure 3-21). Due to the site's locality, it forms a part of the broader cultural landscape and falls within the proposed Heritage Protection Overlay, as seen in Figure 3-21. These sites of heritage significance include:

- Fort Wynyard,
- The Somerset Hospital and its forecourt,
- The building complex (including the City Hospital) along Portswood Road,
- The Green Point Track, and
- The Victoria and Alfred Basins and associated maritime buildings (including the Convict Station and Breakwater Prison).

#### 3.5.2.2.1 Fort Wynyard

Fort Wynyard was declared a National Monument in 1976 and is acknowledged as a Provincial Heritage site in terms of the provisions of the NHR Act. The heritage significance is linked to the fort's strategic defence position at the entrance of Table Bay as well as its ability to cover in the Arc of Fire the approach from Robben Island and the opposite shoreline (Blouberg Shoreline). The fort also has a high international and national significance in terms of its military technology, a high national educational significance, high national and local architectural significance, high local landmark status and high group value.

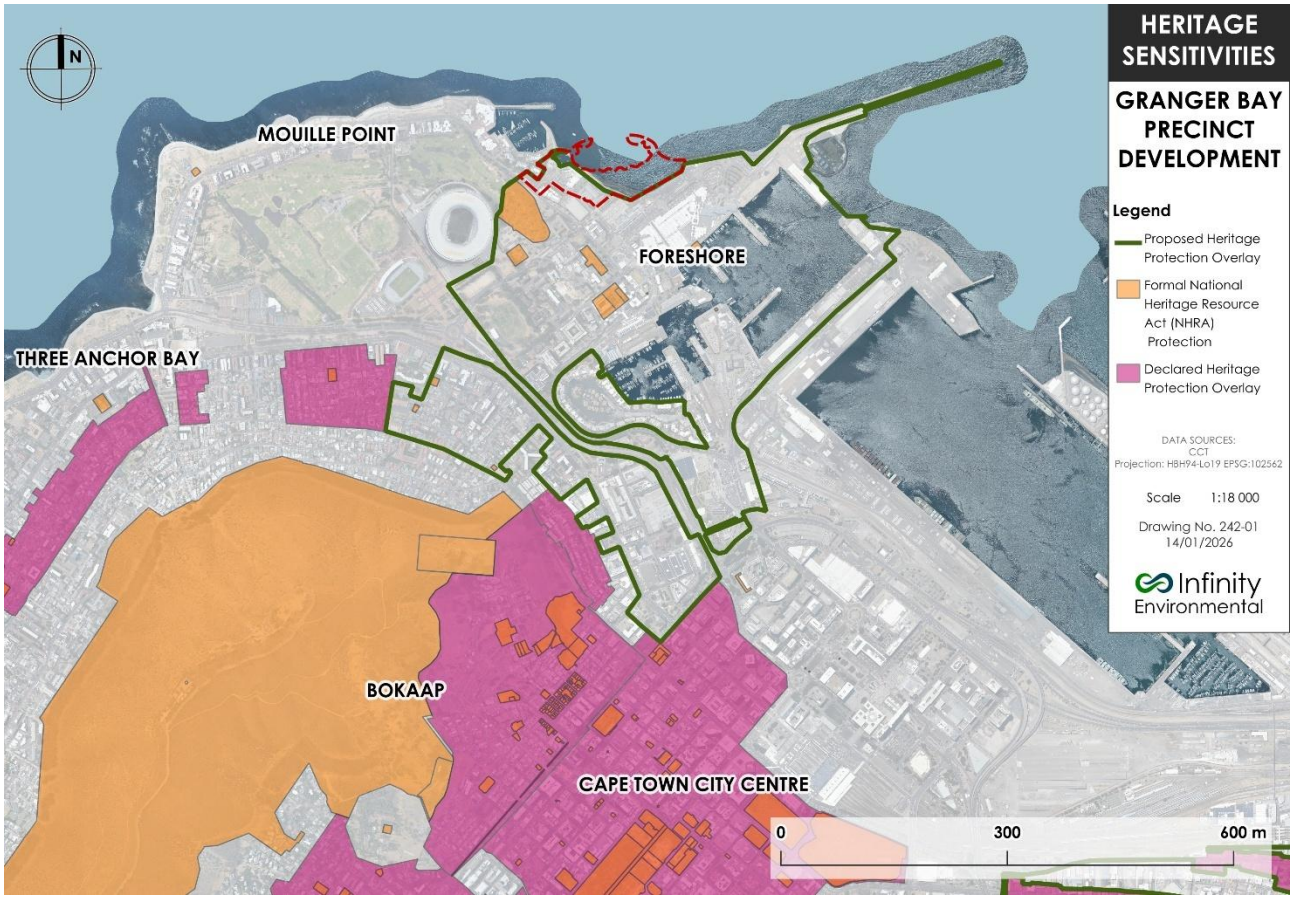



**Figure 3-21: Heritage sensitivities surrounding the site**

#### 3.5.2.3 Heritage Resources on the site

There are a few temporary structures on the degraded site, and it therefore has low heritage significance. Built environmental heritage resources may be graded according to significance (Table 3-10).

Table 3-10: Summary of the guide to grading of built environmental resources (HWC, 2016)

| Grading | Description | Heritage Significance |
|---|---|---|
| **I** | Exceptional resources of national significance | Highest Significance |
| **II** | Special resources in the context of a province/region | Exceptionally High Significance |
| **IIIA** | Rare resources that are significant in the context of the area | High Significance |
| **IIIB** | Significance in the context of a townscape, neighbourhood, settlement or community | Medium Significance |
| **IIIC** | Significance in the context of a streetscape or direct neighbourhood | Low Significance |

#### 3.5.2.3.1 Spatial and Visual Contact with the Water's Edge

The primary character component of any significance present is the spatial and visual contact with the water's edge **(IIIA)**. This is in respect of the public access to the water's edge, the coastal pedestrian walkway and boardwalk runs for almost the entire length of the V&A Waterfront, Granger Bay landholding on its northern coastal edge.

#### 3.5.2.3.2 The Oceana Power Boat Slipway and Access

The Oceana Power Boat Club Slipway (as seen in Photograph 3-1) has a high social and historical significance as it is located on the site of a historical fishery from the 18th century. Additionally, there is speculation that the fishery may have been a whaling station throughout the 19th century.

In terms of the slipway's social significance, it has been used extensively as a launching site for small subsistence and commercial crafts and is one of the only safe recreational launching sites into Table Bay. Many of the fishermen who use the slipway belong to communities that were forcibly removed from Cape Town (District 6, Sea Point) during the Apartheid period and have a long-standing tradition of using the facility to launch their boats. Free and unhindered access to the slipway is regarded as being of high significance to these fishermen **(IIIC)**.

### 3.5.3 Maritime and Terrestrial Archaeological Resources

#### 3.5.3.1 Terrestrial Archaeology

A review of archaeological reports from the V&A Waterfront conducted by Gribble (2024) found no indication that pre-colonial archaeological material has been encountered during archaeological activities within the V&A Waterfront. Gribble (2025) states that it is almost certain that middens and pre-colonial sites were present along this stretch of the Table Bay coast: its rocky shore, with a predictable, high-protein food supply, offering an attractive focus for human use and settlement (Gribble, 2025).

More than 350 years of increasingly intensive colonial and industrial utilisation and transformation of the area are probably responsible for destroying much of this archaeological record. However, Orton et al. (2020) indicate that "the scattered Late Stone Age (LSA) burials and LSA occupational debris from Green Point show that some data can be obtained from heavily built-up areas" and that "while LSA sites are likely to be the most common new finds, older sites certainly lie buried beneath cover sands and calcrete strata". This statement suggests that pre-colonial archaeological material could

survive under the later landfill along the former coastline within the Granger Bay Land Reclamation project site. Given the rarity of such survivals of pre-colonial material in the developed urban context of this part of the city, the archaeological significance and value of any such sites or materials is likely to be high.

#### 3.5.3.2 Submerged Prehistory Archaeology

There is archaeological evidence for a prehistoric human presence in Table Bay, for example, in 1995 and 1996, during the excavation of two Dutch East India Company shipwrecks, divers recovered three Earlier Stone Age (ESA) handaxes from the seabed under the wrecks. The stone tools were found at a depth of 7-8 m below mean sea level from an ancient submerged and infilled river channel (Gribble, 2025).

During periods of lower sea level, human ancestors are likely to have moved out onto the exposed floor of Table Bay and left evidence of their use of that landscape. Landscape features and formerly sub-aerial sediments that have survived subsequent marine transgressions are likely present in Table Bay; thus, there is potential to find pre-colonial archaeological sites and artefacts, and to recover paleoenvironmental data from submerged, seabed contexts within Table Bay (Gribble, 2025).

#### 3.5.3.3 Maritime Archaeology

The historical anchorage in Table Bay has the largest concentration of historical wrecks in South African waters (more than 400). The large number of wrecks is likely due to a combination of factors, including the Western Cape's winter storms, the long history of Table Bay as a shipping hub, and indifferent harbour facilities for most of that period (Burman, 1976; Turner, 1988; Gribble, 2025).

The north-western portion of Table Bay, the location of the proposed development, was relatively protected from the winter north-westerlies, and shipwrecks were less common in this area. Nevertheless, more than 20 shipwrecks or shipping losses occurred in the area between the Green and Mouille Points between the 16th and 19th centuries (Burman, 1976; Turner, 1988; Durden, 1992; shipwreck database†). Some of these wrecks can confidently be placed outside the study area because their remains have been found on the seabed and their positions are thus accurately known; however, the draft Archaeological Impact Assessment suggests that consideration should be given to the possibility that at least some of the vessels listed as having been lost within the project area, making their exact location unknown (Gribble, 2025).

† Maintained by TerraMare Archaeology

**Table 3-11: List of historical wrecks recorded in the vicinity of the project area (Gribble, 2025)**

| Ship name | Date | Place of wreckage |
|---|---|---|
| Apollo | 1823 | Ran ashore at Green Point close to the Moulin Battery |
| Arabia | 1858 | Struck rocks and wrecked at Mouille Point |
| Athens | 1865 | Wrecked on the rocks between Green Point and Mouille Point |
| Catherine Jamieson | 1840 | Ran aground on rocks at Mouille Point |
| Chieftan | 1848 | Wrecked on Mouille Point |
| Dido | 1853 | Wrecked on rocks at Mouille Point |
| Eliza | 1863 | Ran aground on rocks at Mouille Point |
| Ellen Maria | 1868 | Wrecked on the rocks at Green Point |
| Enchantress | 1849 | Wrecked between Green Point and Mouillle Point |
| Frances | 1840 | Ran ashore at Mouille Point |
| Helen / "Glass Wreck" | 1842 | Ran ashore at Mouille Point |
| Highfields | 1902 | Sank after collision with the Kaiser just outside the Breakwater |
| Hoop | 1784 | Ran ashore close to Mouille Point |
| Juliana | 1839 | Ran ashore at Mouille Point |
| Mary Stewart | 1842 | Went ashore between the lighthouses |
| Miner | 1857 | Capsized off Granger Bay |
| Mulgrave Castle | 1825 | Driven onshore and wrecked close to Green Point lighthouse |
| Olga R | 1885 | Ran aground on the reef at the point |
| Palmer | 1840 | Ran aground on rocks between the lighthouse and Moulin Battery |
| Piscatatqua | 1865 | Ran ashore opposite the wreck of the Athens |
| Prince Rupert | 1841 | Ran ashore at Mouille Point |
| Reno | 1883 | Ran aground at Mouille Point |
| Royal William | 1837 | Struck rocks at Green Point near Lazar's Fisheries |
| Sheperd | 1874 | Foundered on north side of Breakwater |
| Sincapore | 1832 | Ran ashore at Mouille Point |
| Swea | 1852 | Ran ashore near the "old" lighthouse |
| Udeny Castle | 1840 | Ran ashore at Mouille Point |
| Wasp | 1863 | Capsized outside the Breakwater |

## 3.6 Summary of Key Receiving Environment Aspects Associated with the Site

**Biophysical Environment**

The proposed site is highly transformed, and there are likely no terrestrial sensitivities. The proposed development is located within a vulnerable marine ecosystem adjacent to the Robben Island Marine Protected Area, although the western portion of the site is in an Ecological Support Area. The area supports a variety of marine ecosystems, such as the Cape Kelp Forest and Cape Mixed Shore. Additionally, the site falls within the Table Bay West Coast rock lobster sanctuary, where the removal of lobsters is prohibited. Other species found in the area include the Heaviside's dolphins and galjoen.

**Socio-Economic Environment**

This site is locally significant from a socio-economic perspective related to its central location in the City of Cape Town. The Granger Bay and V&A Waterfront areas are popular tourist destinations with a diverse array of attractions and public amenities linked to their proximity to the coast.

**Heritage Resources**

The site and surrounding area have a rich history and historical resources that need to be considered and preserved on and surrounding the site. This includes considering potential marine archaeological resources, preserving view corridors and abiding by the relevant building restrictions.

# CHAPTER 4
# PROJECT PROPOSAL AND ALTERNATIVES

**January 2026**

**Final Scoping Report**

Infinity Environmental

# 4 PROJECT PROPOSAL AND ALTERNATIVES

This chapter of the report describes the principles, informants and site selection process that informed the proposed development. The various components of the proposed development framework are described. This chapter also presents the alternative development options.

## 4.1 Principles and informants

The proposed development includes the replacement of coastal defence structures and the reclamation of land at the V&A Waterfront, a locally and internationally popular destination and living and working environment. These are in support of new public coastal amenities, including a coastal sea park with leisure and recreational facilities, and mixed-use development spaces comprising residential, hotels, leisure, and commercial development with outward views of the sea.

The V&A Waterfront is spatially constrained as the surrounding land is largely developed and/or includes significant heritage resources that constrain development potential. Land reclamation will improve public access to the coast, provide additional public amenities, and allow underutilised land to be optimised for development. Moreover, to maintain the site and improve resilience against storm surges, the current artificial embankment and gravel beach need to be upgraded. These improvements are necessary as the existing gravel beach and unprotected embankment are not adequate to provide the essential shore protection for future site development (Photograph 4-2; Photograph 4-4; Photograph 4-5).

The City of Cape Town's Spatial Development Framework (2023) recognises the V&A Waterfront as a part of the Inner Urban Core and a metropolitan node within the City of Cape Town's Metropolitan Area. The proposed expansion of the Granger Bay Precinct aligns with the Provincial Spatial Agenda to grow the Western Cape Economy in partnership with the private sector, non-governmental and community-based organisations. Moreover, the proposed development aligns with the spatial logic to cluster economic infrastructure and facilities along public transport routes to maximise the coverage of these public investments within the Provincial Spatial Development Framework (2014). Moreover, the Catalytic Land Development Programme (CLDP), specifically the Gateway catalytic precinct, aligns with this development as it aims to unlock the economic potential of the Foreshore area and strengthen linkages between the Central Business District (CBD) and V&A Waterfront.

Project descriptions outlined in this chapter are preliminary, and some of the details presented herein may change during the detailed design phase and upon further investigations (including the findings and input of the specialist studies conducted during the EIA Phase of the proposed project).

## 4.2 Land Uses

The proposed land uses will be mixed-use, with residential being the primary use, with some retail and commercial use. The revetment and land reclamation area is proposed to be utilised for coastal public amenities and land parcels for mixed-use development.

The proposed development centres on the reclamation of approximately 3.2 hectares of land from Table Bay to accommodate new coastal public amenities and new mixed-use development. This reclamation will include, and be protected by, a new permanent rock revetment and two

breakwaters forming a new protected bay approximately three hectares in extent. The west breakwater will extend approximately 90 m into Table Bay, and the east approximately 140 m. A revetment connecting the two breakwaters will be approximately 540 m long.

New public amenities will include the new bay, sheltered waters for boating, kayaking, and swimming. Land-based amenities will include a coastal public walkway, a slipway, a fixed quayside, a landscaped promenade, tidal pools, pedestrian paths, and open areas. According to a preliminary Geotechnical Functional Requirements Report (PRDW, 2024), the eastern portion of the bay will include three tidal pools, and the western portion of the bay will include the slipway (Figure 4-1).

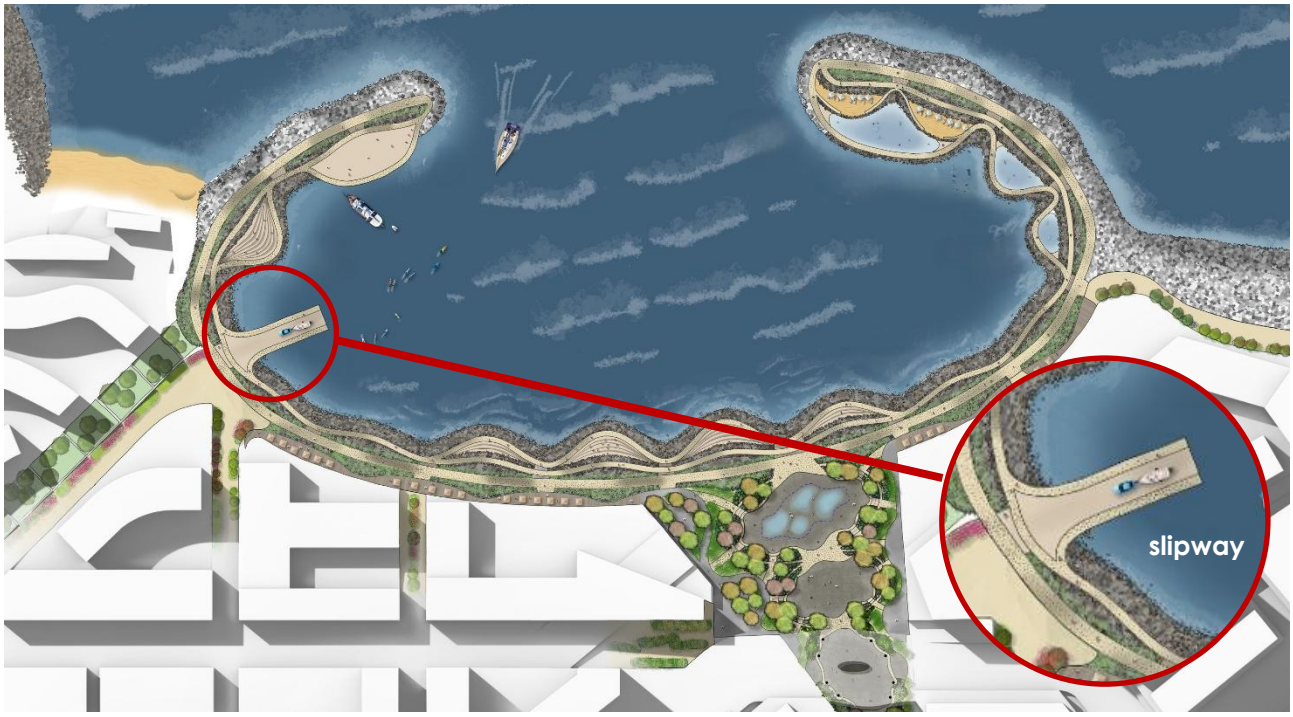



**Figure 4-1: Proposed conceptual land uses and public amenities.**

Development rights were approved in March 2014 and are already in place for the landward portion of the Granger Bay precinct. The subject of the proposed application is the portion located landward of 100 m of the highwater mark, which will accommodate residential, hotel, leisure, and commercial uses, with residential accommodation options such as hotels, serviced apartments, and private apartments. Approximately 78 000 $m^2$ of bulk will be allocated from the existing development rights permitted within the V&A Waterfront. The orientation and massing of buildings will respond to the coastal setting and maximise outward views of the ocean.

The Granger Bay development will be supported by various transport modes, including MyCiTi, Park & Ride, and micro-mobility services, with enhanced integration between these modes. No major access road upgrades are proposed. Wastewater management, potable water supply, solid waste removal and disposal, and electricity supply will be accommodated within existing local authority approvals for the total V&A Waterfront development rights.

## 4.3 Development Footprint and Structure Determination

The proposed site was the only site considered for development based on the approved Development Framework for the V&AW (1991), which formed part of a package of plans approach

to development, which included the proposed site and recognised that the V&A Waterfront property would be developed over an extended period, depending on market demand. Numerous investigations, including environmental and engineering assessments, have been conducted over the last decade, which allowed for an iterative design process.

The current and most recent proposed development includes the designs based on previous consultations, agreements, and specialist assessments. The development proposal was formulated per the applicable planning frameworks and identified informants.

The major design informants for the proposed development include:

- Contextual informants,
- Socio-economic factors
- Environmental and engineering informants,
- Heritage informants, and
- Policy frameworks.

### 4.3.1 Design Informants

#### 4.3.1.1 Contextual

A key informant of this development is the location of the precinct in relation to significant public facilities. The Granger Bay Precinct is a comparatively large site, with ocean-facing views along the Atlantic coastline, and the area is of high value. Due to the underutilised and underdeveloped nature of the site, there is an opportunity to integrate the surrounding areas with the V&A development. The development will be designed in response to its unique interface between the City and the Atlantic seaboard.

#### 4.3.1.2 Economic

The V&A Waterfront contributes significantly to economic productivity and is an established feature of the Western Cape economic landscape. It is therefore essential that the Granger Bay precinct and V&A Waterfront continue to maintain their status as a beneficial financial investment. The proposed development is intended to provide a high-quality living environment and sustain the surrounding economy. Thus, this proposed development has the potential to enable large investments in public infrastructure and add to the V&A Waterfront's amenity value. The realisation of this development is largely dependent on the construction of coastal public amenities and residential areas.

Moreover, the development will provide additional spaces for recreational activities in the Granger Bay precinct, such as walking, running, swimming, Stand-up paddle-boarding (SUP), and kayaking, thereby providing additional tourism spaces within the precinct.

#### 4.3.1.3 Environmental and engineering

The coastline along the site consists of random fill material and dolosse that do not provide the necessary protection against storm conditions. The current exposed coastline poses a threat to development opportunities in the Granger Bay precinct due to periodic wave impact and intense weather conditions (e.g., storm surges) impacting residential, retail, and commercial operations. Extreme storm surges are expected to become more frequent due to climate change; therefore, it is essential that coastal developments have adequate coastal protection to prevent flooding damage.

With the development of new coastal protection, design linkages must be made with the coastal promenade, and adequate public access must be provided. The Climate Change Impact Assessment will guide climate change adaptation measures, where required in the design.

Harbours or embayments are typically designed based on a set of functional requirements such as the protection required for vessels, allowable overtopping, and prevention of damage to infrastructure and equipment (PRDW, 2025). However, the intention of the Granger Bay breakwater area is not to provide safe mooring for vessels but more of a tourist attraction and will therefore be designed accordingly, accounting for public access and public amenities such as tidal pools and walkways.

Previous engineering assessments have confirmed the benefits of efficient revetment designs and land reclamation in terms of storm surges and flooding risks to public areas. Appropriate revetment designs, such as the "cascade design", can allow for reduced wave heights, circulation within the development area to promote flushing, and space for public amenities (Figure 4-2 and Figure 4-3). The Wave and Hydrodynamic Modelling Study prepared by PRDW Consulting Port and Coastal Engineers is attached as Appendix G to this report.

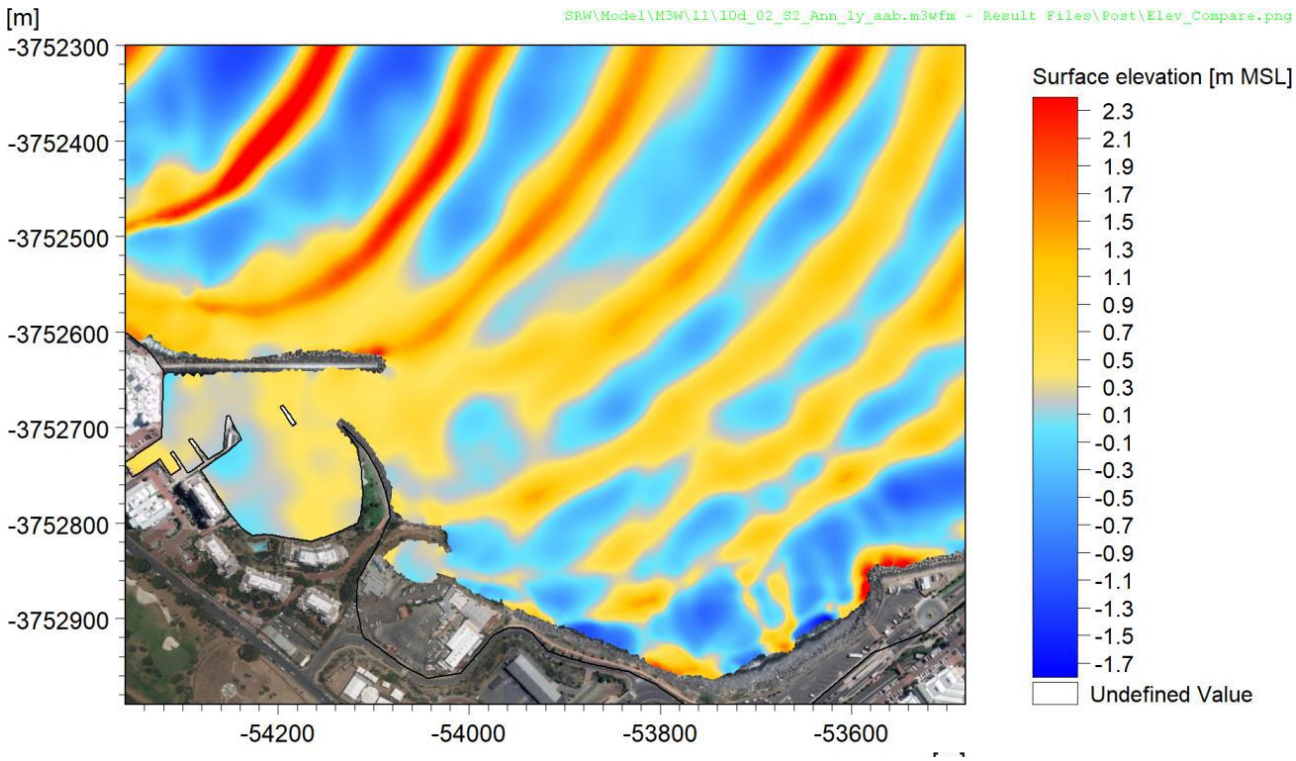



**Figure 4-2: Instantaneous surface water elevations for baseline layout for the 1-year return period (PRDW, 2023)**

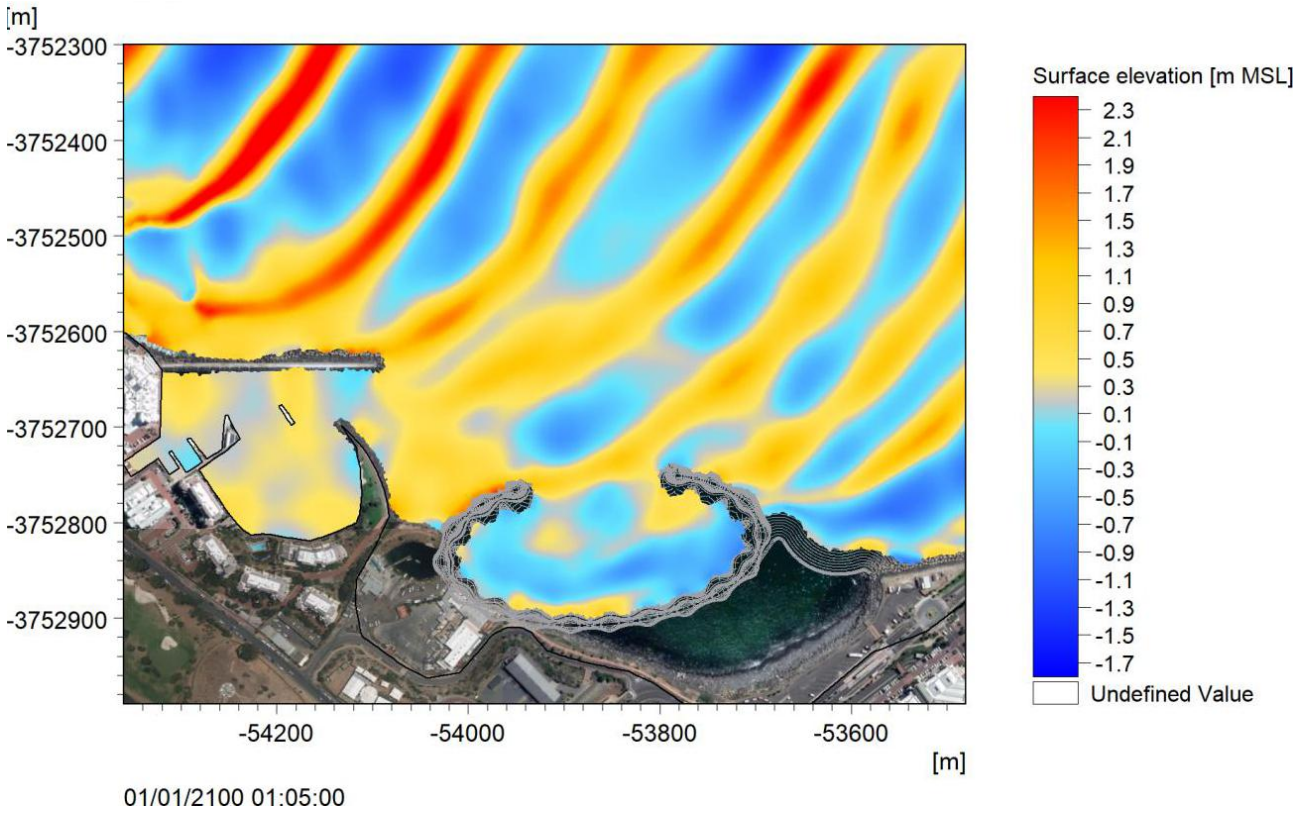



**Figure 4-3: Instantaneous surface water elevations for the development layout for the 1-year return period (PRDW, 2023)**

4.3.1.4 Heritage resources

Heritage resources, including Robben Island, Table Mountain and specifically Fort Wynyard southwest of the site, are significant informants for this proposed development. The Granger Bay Precinct Plan (approved by the City of Cape Town in 2014) phases and informants align with the 2011 **Heritage Record of Decision (RoD)**. The Fort Wynyard heritage significance has been established, and any development within the Granger Bay precinct must conform to the following:

- **The Arc of Fire**: the historic arc of fire from a gun emplacement at Fort Wynyard, where no buildings may exceed a height of 21.5m in the arc, and buildings of 10 and 16 floors are acceptable outside of the arc (Figure 4-4).
- **Spatial field**: the area around Fort Wynyard, including the identified sloping grassed battlements, the Beach Road Reserve and a portion of the site, must be integrated and made into a single spatial field.
- **Water's edge view**: the 30-metre-wide view corridor from the main gun emplacements to the coastline needs to be kept open to ensure a visual linkage between Table Bay and Fort Wynyard.
- **Coastal public access**: a pedestrian route along the Granger Bay water's edge would be key to provide views of the Robben Island and Table Mountain Heritage Sites, and must be included.

Resultant design requirements that emerge from the consultation with heritage authorities will be incorporated. Figure 4-4 shows the proposed development boundary (blue) in relation to the various heritage informants, including the Arc of Fire, view corridors (green) and buildings of heritage significance (brown).


**Figure 4-4: The historic Arc of Fire from Fort Wynyard**

#### 4.3.1.5 Zoning

The zoning of the V&A Waterfront, Transport Zoning 1: (Development Zone) was established in accordance with the March 1993 zoning agreement between CoCT, Transnet, and V&AW. This zoning and the associated Package of Plans approach to planning and development in the Waterfront constitute the development rules for the V&AW. This zoning permited the V&A Waterfront to be developed for a compatible mix of industrial, recreation, cultural, education, residential, retail and office purposes up to a maximum of 613 859 $m^2$ of development bulk. More specifically, the Granger Bay precinct is earmarked for "waterfront residential, marina" development with a development bulk allocation of 78 000 $m^2$. The proposed development will fall within the basket of rights for the Granger Bay precinct. This EIA application is independent of the current rezoning application.

The erven were part of a rezoning application to Mixed Use (MU3), which was approved on 1 December 2025 in terms of the City of Cape Town Municipal Planning Bylaw (2015). The land-use planning context will be updated in more detail in the upcoming EIA report.

## 4.4 Concept design

The proposal (dated 2023) replaces an earlier approved scheme with DEADP case reference: 16/3/3/2/A7/4/3051/25 dated 13 April 2018 (Figure 4-5). The 2018 EIA approval was for a 310 m extension of the dolos revetment and a rock revetment of 160 m replacing the gravel beach and unprotected embankment. The extension was approved as a straight line extending the existing dolos revetment at the end of Breakwater Boulevard in a westerly direction across Granger Bay. The total combined length of the approved straight-line revetment was approximately 470 m. The reshaped revetment will be 540 m long, the west breakwater approximately 90 m, and the east breakwater approximately 140 m. This coastal infrastructure will provide the required protection for the proposed mixed-use development in the precinct as well as the existing infrastructure on Erf 149294 (e.g., parking structures and Breakwater Boulevard) and enable an appropriate response to the heritage and development informants for the Granger Bay precinct.

In addition, this coastal protection will include a paved pedestrian walkway that will connect to the Mouille Point promenade via Beach Road and provide continuous public access from Beach Road to and along the coast. The route will include outdoor leisure and recreational facilities. The extended 540 m coastal walk within the application site will be supplemented by approximately 100m of public pedestrian paths along each breakwater.

An area of approximately 2.4 ha of newly reclaimed land formed part of the 2018 Granger Bay EIA approval. The reshaped revetment does not result in a substantial increase in the extent of land to be reclaimed; however, it needs to be noted that the two breakwaters comprise an area of a further 0,8 ha.

The key differences between the 2018 approved scheme and the proposed 2023 scheme are:

- The reshaping of the proposed rock revetment and an increase in total revetment length from 470 m to 540 m,
- The inclusion of two permanent breakwaters, the east breakwater of approximately 90 m and the west breakwater of approximately 140 m, and
- The inclusion of public amenities within shoreline protection infrastructure, with a 540 m extension of the coastal public walkway, and connection to the Sea Point Promenade.

**These differences allow for improved coastal defence, a more inclusive design, and additional public coastal amenities. An iterative design process was followed, which centred around the design informants outlined in the section. and led to the final concept design in Figure 4-6.**

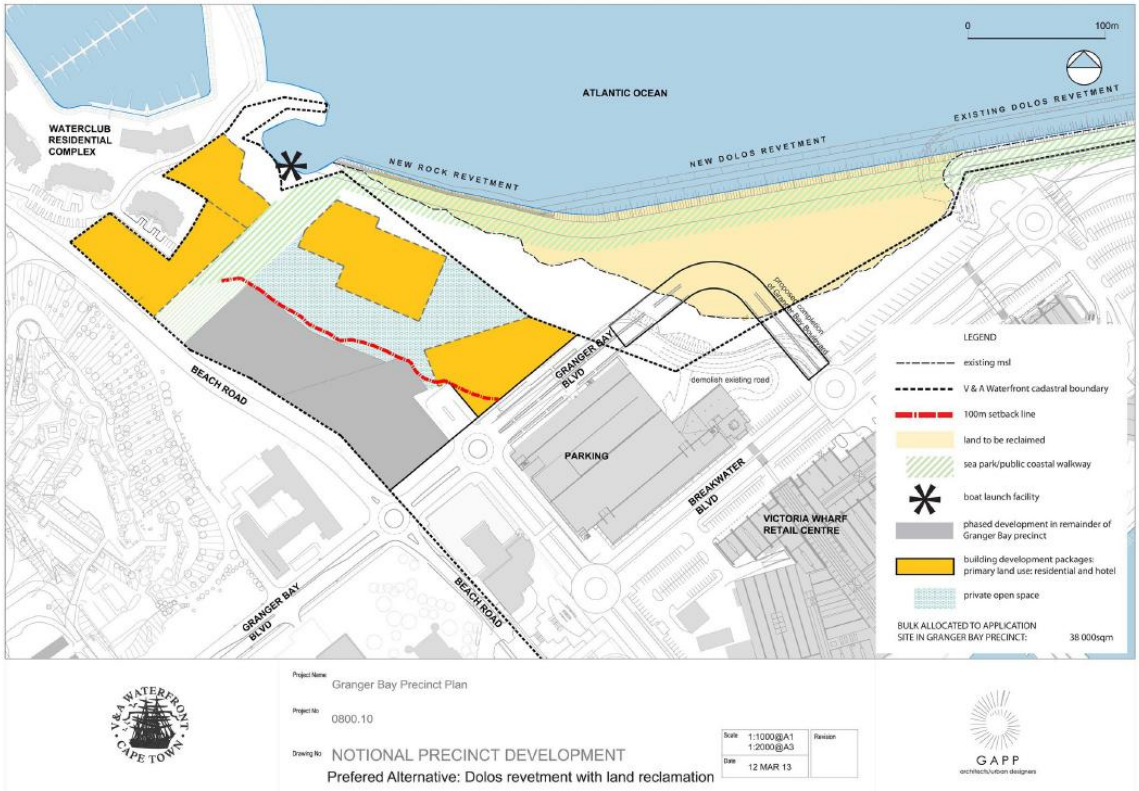



**Figure 4-5: Previously approved concept development (V&A Waterfront, 2018)**

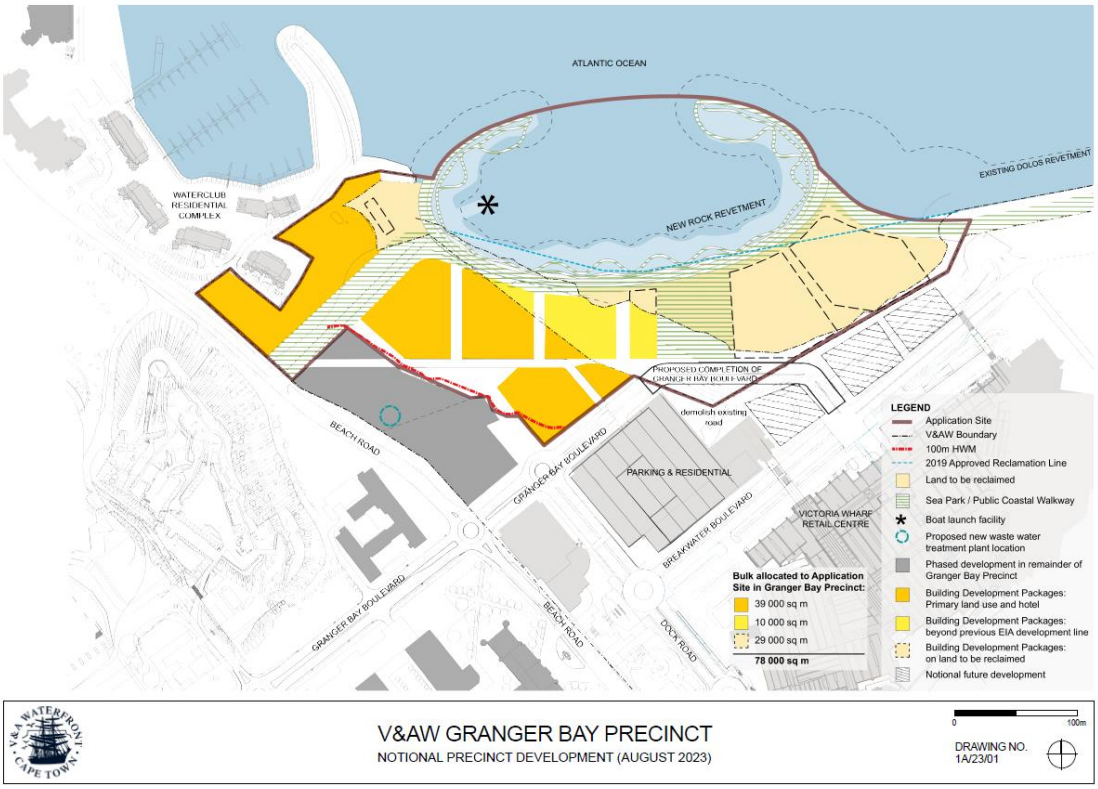



**Figure 4-6 Proposed concept Development (V&A Waterfront, 2023)**

### 4.4.1 Marine Infrastructure Construction

The marine works for land reclamation will be the necessary first phase of the development and will be phased over a period of around 2.5 years (Figure 4-7; PRDW, 2025). The design life of normal marine structures forming part of Phase 0 is selected as 50 years, which corresponds to a return period of 475 years. Key elements of the marine infrastructure forming part of the Phase 0 development include:

- Breakwaters and Revetments,
- Capping of the breakwater,
- Walkways and Stairs,
- Tidal Pools and walkways,
- Seawater Replenishment System,
- Quay with a vertical wall and steps with provision for temporary walk-on moorings,
- Space for public events and facilitate the mooring and boarding of vessels,
- Slipway and permanent walk-on mooring, and
- Stormwater outfalls.

The public slipway and launch site are to be retained, along with ancillary facilities (trailer parking, etc.). Access to a functioning slipway is expected to be retained throughout the construction process by constructing a new slipway before the closure of the existing one. Institutional considerations regarding the management of the new slipway have not yet been confirmed; the requirements of all users of the slipway will be considered.

The proposed bay formed by the two breakwaters is modelled to be safe for small craft under most conditions, and to have wave velocities and heights very similar to those in the existing slipway area. The current speeds in the new Granger Bay due to wind, tides, and ocean currents are projected to be a maximum of 0.06 m/s in summer and 0.02 m/s in winter (PRDW, 2023; Appendix G).

Plain concrete will be used wherever possible, and reinforced concrete will be used for concrete elements that are subjected to high bending and tensile loads. These elements will be designed to be durable over the design working life of the development. High-performance concrete mixes and adequate concrete cover will also be utilised to mitigate the risk of chloride-induced reinforcement corrosion. Moreover, protected reinforcement, such as basalt fibre reinforced polymer (BFRP) reinforcement or galvanised steel, will also be considered wherever possible.

The total calculated rock mass required for the development is approximately 351,000 tonnes to be imported from quarries over a two-year period. This equates to approximately 16 700 truckloads – averaging 35 loaded trips per day, or 4-6 trucks per hour during active daytime haulage. The quarried rock used for the land reclamation will be based on the Rock Manual (CIRIA; CUR; CETMEF, 2007). Most material is expected to be hauled from Dorstberg and other quarries via Contermans Kloof → N7 → N1 → Buitengracht (M62) → Helen Suzman Blvd (M6) → Granger Bay Boulevard. Construction activity will likely be confined to standard daytime hours with deliveries restricted during commuter peaks. A detailed Traffic Management Plan must prescribe specific controls for scheduling, haul-route maintenance, signage, and coordination with MyCiTi Operations and the City's Urban Mobility Directorate to manage any short-term route or stop disruptions. The type of quarried fill will be rock, with 80% of the rock mass below 500 kg and 20% of the rock mass above 500 kg and up to 6 tonnes. Transportation of the rock material will be via both articulated and rigid trucks. The Transport Impact Assessment, to be published for comment in the EIA Report, will include an assessment of the impacts of the transportation of quarry material to the proposed site.

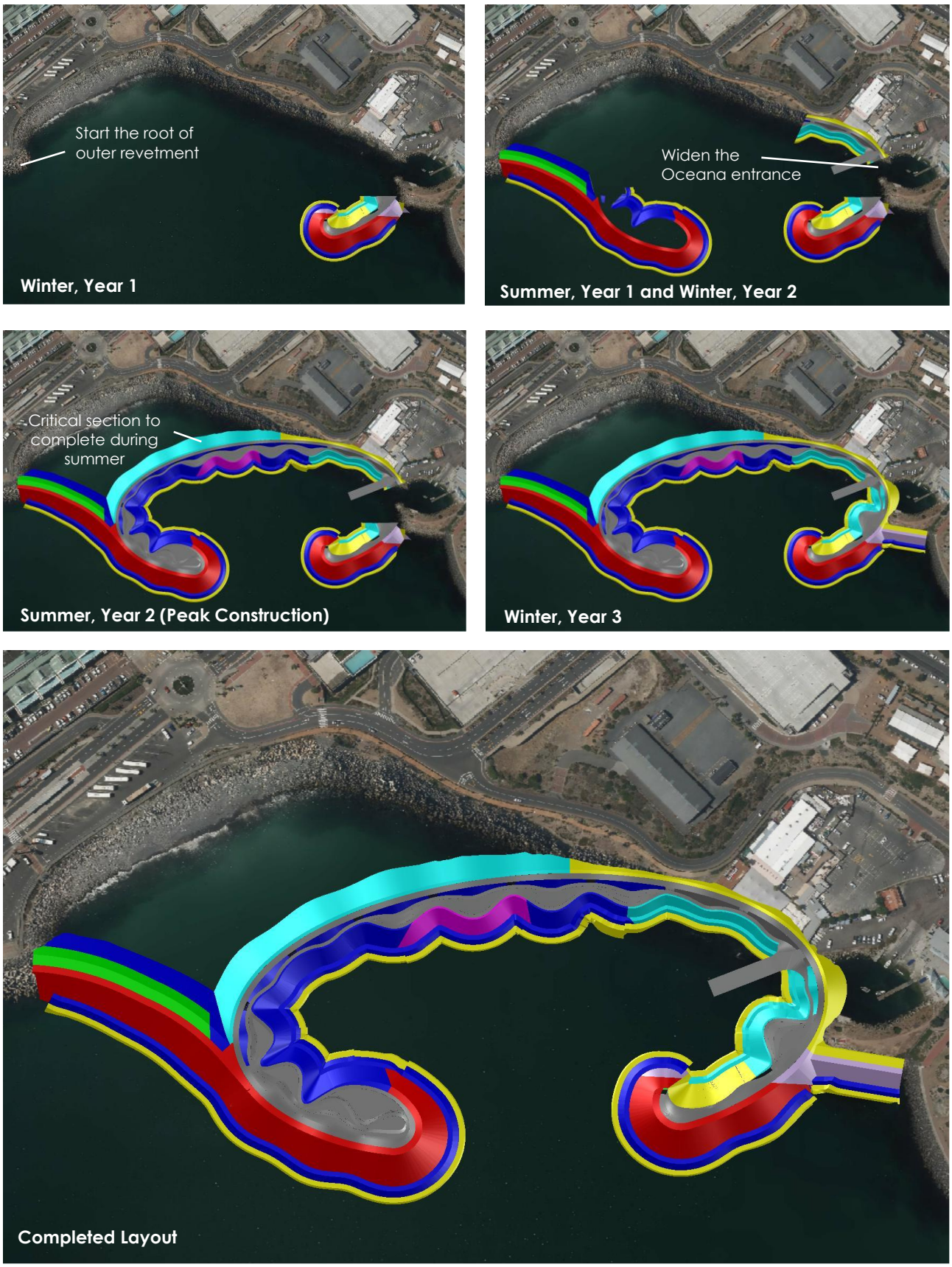



**Figure 4-7: Conceptual Construction Schedule for Granger Bay Phase 0 Infrastructure (PRDW, 2025)**

### 4.4.2 Land-Based Infrastructure Construction

The land-based infrastructure construction plans have not been compiled at the time of this report.

### 4.4.3 Services

The proposal is to develop 78 000m² of bulk within the V&A Waterfront's existing available bulk rights. Water and sewer reticulation networks within the V&A Waterfront are managed and maintained by the applicant, with the City of Cape Town providing connections to its bulk water and sewer networks (Appendix F). The anticipated services demand is calculated on the land-use mix in Table 4-1. The estimated water demand and sewer flow (Table 4-2) have been updated since the Draft Scoping Report based on comments received from the City of Cape Town, and an updated services confirmation report has been requested from the City of Cape Town, which previously confirmed capacity for service demand values slightly lower than the values presented below.

**Table 4-1: Land-use mix information used to calculate service demand**

| Land Use Type | Quantity | Type | Converted Quantity | Type |
|---|---|---|---|---|
| Residential | 50 700 | m² GLA | 500 | Units |
| Cultural | 1 200 | m² GLA | 514 | Persons |
| Hotel | 11 400 | m² GLA | 125 | Rooms |
| Retail / Restaurant | 6 200 | m² GLA | - | - |
| Retail / Light Industrial | 8 500 | m² GLA | - | - |
| **Total** | **78 000** | **m² GLA** | | |

The estimated demand and sewer flow for the proposed development are set out in Table 4-2 based on a water demand of ± 222.78ℓ/100m²/day and a sewer flow of 95%.

**Table 4-2: Estimated water demand and sewer flow for the proposed development**

| Description | Quantity (Units/Area/No. people) | Potable water demand | | | Sewer flow | |
|---|---|---|---|---|---|---|
| | | Annual Average Daily Demand (kℓ/d) | Peak Flow (ℓ/s) (PF=3.0) | Fire Flow (ℓ/s) | Annual Average Daily Flow (kℓ/d) | Peak Flow (ℓ/s) (Wet weather, PF=2.5) |
| **Total** | 78 000 m² | **222.78 kℓ/d** | **7.7 ℓ/s** | 15.0 ℓ/s | **310.7 kℓ/d** | **8.5 ℓ/s** |

#### 4.4.3.1 Potable Water

The City of Cape Town has confirmed (Appendix F) that the proposed development falls within the Molteno water distribution zone. It will be supplied by a 305 mmØ water main along Beach Road, which has a peak flow and velocity of 12.8 ℓ/s and 0.1 m/s, respectively. The peak and static pressure in the area range between 80-85m and 85-90m, respectively. The City's Water and Sanitation Department will be requested to confirm that the water main has sufficient capacity and residual pressure to supply the proposed estimated flow from this development, and that the City of Cape Town's bulk supply system has sufficient water resources, treatment, bulk storage and conveyance capacity to supply the estimated average daily demand of 222.78.0 kℓ/d of the proposed development. This will be confirmed with the City of Cape Town, and an updated services confirmation letter will be provided in the EIA Report.

#### 4.4.3.2 Wastewater

This proposed development is situated within the catchment of the Green Point Marine Outfall. The City's Water and Sanitation Department has confirmed that this outfall works has sufficient unallocated capacity to accommodate additional development.

Wastewater generated from the development will be discharged to the municipal sewer system (in the Green Point marine outfall catchment) in the short term, and it is anticipated that, in the longer term, it may be treated by a new wastewater treatment plant to be constructed by the V&A Waterfront. No additional sewer upgrades are expected to be required as the existing sewer conveyance network has sufficient capacity to accommodate the development (**Appendix F**). This will be confirmed with the City of Cape Town based on the updated calculations provided above, and an updated services confirmation letter will be provided in the EIA Report.

#### 4.4.3.3 Stormwater

The V&A Waterfront stormwater network is self-contained, with no upgrades needed to the City of Cape Town's (CoCT) system. An existing 1.5m diameter stormwater drain in Granger Bay will be extended to the new revetment and designed to accommodate storm surge events. Additional stormwater outfalls are planned through the sea wall/revetment. Basic on-site stormwater quality management is planned for the site.

#### 4.4.3.4 Electrical

A full new electrical distribution network is planned for the site. The design of this proposed new infrastructure has been carried out based on preliminary discussions held with the CoCT. The City's Electricity Generation and Distribution Department has confirmed that there is sufficient spare capacity for the proposed development. The existing 11kV infrastructure will need to be augmented, including substations and points of metering. Any upgrades required for the electrical infrastructure will be done at the applicant's cost (see **Appendix H** for the City's full comment).

#### 4.4.3.5 Solid waste

The V&A's solid waste handling centre has existing capacity to manage the proposed waste generated from the proposed developments (**Appendix F2**).

### 4.4.4 Energy and water saving considerations

A key consideration for the future detailed design of the development will be to minimise the consumption of constrained services such as water and electricity. The detailed design of these aspects is beyond the scope of the current level of assessment.

At minimum, the development will be designed to comply with South African National Standard (SANS) 10400–XA 2021 ed.2, or any updated version thereof, that amongst other requirements specifies:

- Mandatory performance requirements for energy demand reduction;
- Promotion of the use of energy-efficient lighting systems, including the exclusion of incandescent globes that do not meet performance thresholds and encouragement of low energy lighting such as LED as well as lighting controls such as occupancy sensors;
- Requirements for walls, roofs, glazing and insulation that indirectly reduce energy consumption and associated emissions;

- Promotion of the use of renewable and low carbon energy technologies including a requirement that a minimum percentage of a building's hot water demand be met through renewable or alternative energy sources

Water-saving devices and technologies such as dual flush toilets, low-flow shower heads and taps, are already standard practice in the V&A Waterfront and will be implemented in the proposed development.

## 4.5 Access and transport

### 4.5.1 Vehicular access

The Granger Bay Precinct is accessible via a network of primary and secondary roads that serve both development parcels and broader V&A Waterfront circulation. According to the 2015 TIA (GIBB, 2015), the primary access points to the precinct are:

- **Access Point 1**: Off Beach Road (Class 4)
- **Access Point 2**: Granger Bay Boulevard roundabout
- **Access Point 3**: Primary Granger Bay Boulevard ingress

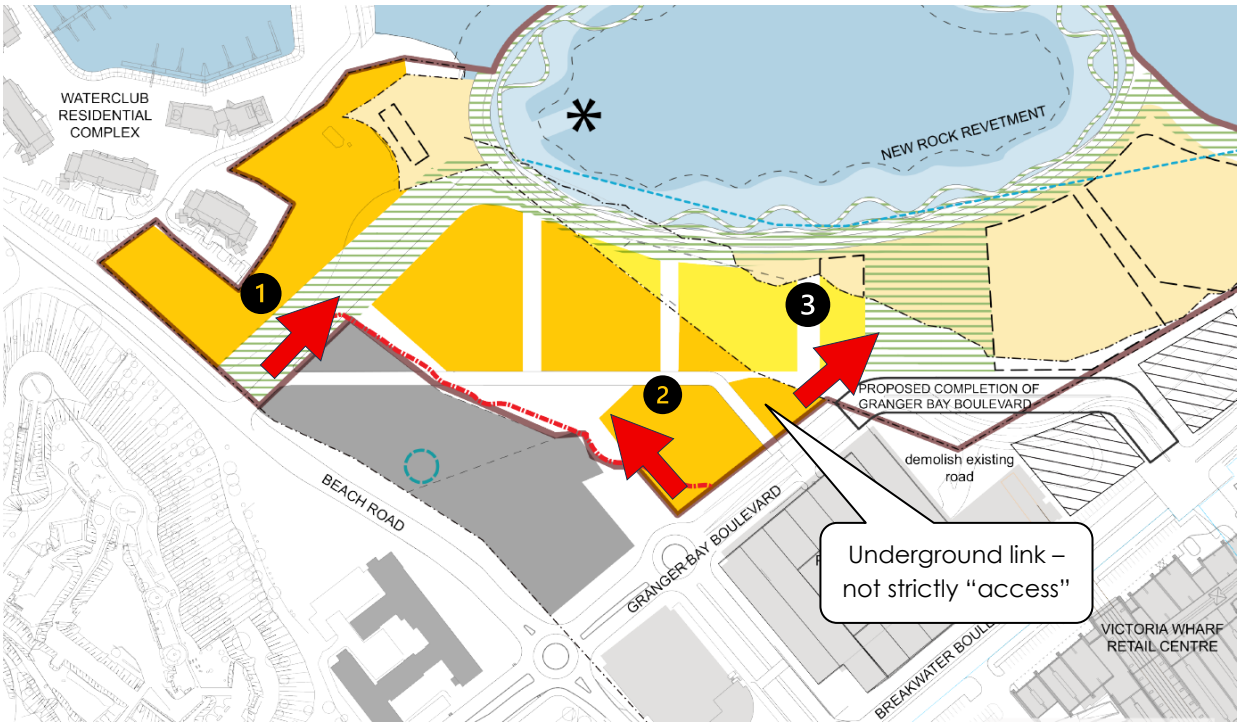



**Figure 4-8. Access points**

In addition, several minor internal access points will serve individual land parcels via Haul Road and newly realigned internal roads, all classified as Class 5 roads.

The proposed access locations, including the three main access points and minor internal driveways, are considered compliant with the *City of Cape Town Access Management Guidelines (AMG, 2020)* based on current functional classifications. No adverse traffic impacts are anticipated with respect to spacing adequacy or intersection performance. Both Beach Road and Granger Bay Boulevard are suitably classified to support the proposed land use intensity, while internal roads are sufficiently equipped to manage lower-volume parcel access.

There will be no access control measures (e.g., boom gates) along external public roads, thereby allowing for uninterrupted flow into and out of the precinct. Instead, access control will be applied at the entrances to individual buildings and structured parking garages, where relevant.

A Transport Impact Assessment, conducted by Motion Consulting Engineers, will be included as part of the EIA phase of the process.

## 4.6 Alternatives

**What are alternatives?**
An alternative is defined as one of the two or more ways of achieving the same desired end or goal. The amended 2014 EIA Regulations (GN e326 of 2017) define "alternatives" as "different means of meeting the general purpose and requirements of the activity, which may include alternatives to the:

- Property on which or location where the activity is proposed to be undertaken;
- Type of activity to be undertaken;
- Design or layout of the activity;
- Technology to be used in the activity or operational aspects of the activity; and
- Includes the option of not implementing the activity.

In terms of the National Environmental Management Act (NEMA), Environmental Impact Assessment (EIA) Regulations, the applicant is required to demonstrate that reasonable alternatives have been described and investigated in detail. Appendix 2 of the amended EIA Regulations provides the following objectives of the scoping process in relation to alternatives:

» To identify and confirm the preferred activity and technology alternative through an impact and risk assessment and ranking process, and
» To identify and confirm the preferred site, through a detailed site selection process, which includes an impact and risk assessment process, inclusive of cumulative impacts and a ranking process of all the identified alternatives, focusing on the geographical, physical, biological, social, economic, and cultural aspects of the environment.

Therefore, the Scoping Report is required to provide a full description of the processes followed to reach the proposed preferred activity, site, and location, including details of the alternatives and the outcome of the selection matrix.

Section 24(4)(b)(i) and 24 (4a) of NEMA require an EIA to include an investigation and assessment of impacts associated with alternatives of the proposed project. In addition, Section 24O (1)(b)(iv) also requires that the Competent Authority, when considering an application for Environmental Authorisation (EA), takes into account "where appropriate, any feasible and reasonable alternatives to the activity which is the subject of the application and any feasible and reasonable modifications or changes to the activity that may minimise harm to the environment". Therefore, at a minimum, the assessment of alternatives should include the no-go scenario and the maximum development scenario.

### 4.6.1 Site Selection Process

A Scoping Report is required in terms of the EIA Regulations to identify and confirm the preferred site through a detailed site selection process; although the proposed development is an expansion and continuation of an existing development implemented over the past 30 years, relevant considerations in relation to the selection of the site are set out below.

The site is owned and managed by the Victoria & Alfred Waterfront Company and is located within the City of Cape Town in a popular tourist area, the Granger Bay Precinct. The site description and receiving environment are described in Chapter 3 of this report.

In the late 1980s, it was determined that parts of the docklands in what is now the V&A Waterfront were no longer essential for industrial harbour activities or cargo transit. This led to an agreement between Transnet and the City of Cape Town to allocate redevelopment rights for the V&A Waterfront, recognising that the V&A Waterfront property would be developed over an extended period and would depend on market demand. The proposal for the construction of a deep breakwater and associated recreational reclamation area in the Granger Bay area has been part of the V&A Waterfront's concept design planning since 1998 and was also shown in plans prepared by Sea Fisheries in the 1980s.

Key factors considered by the applicant in their selection of the Granger Bay Precinct site included:

- The potential to provide improved coastal amenities to the public on vacant and underutilised land,
- Location in relation to the CBD and access to major roadways,
- Insufficient shoreline protection from the existing embankments and eroding gravel beach (Photograph 4-2; Photograph 4-4Photograph 4-4 Photograph 4-5),
- The completion of the V&A Waterfront precincts and demand for land in the surrounding area,
- Spatial planning compatibility and socio-economic potential, and
- The availability and feasibility of bulk services.

A site selection matrix is provided below, elaborating on these and other factors.

**Table 4-3: Site selection matrix**

| Factor | Preferred site | Other sites owned by the applicant |
|---|---|---|
| **Current land use** | The proposed site is underutilised as it contains large portions of vacant land, various parking spaces, storage areas, and areas leased to commercial businesses. This includes a parking area for approximately 400 vehicles that serves temporary uses in the precinct, the Oceana Power Boat Club, the Grand Café & Beach (which is scheduled to expire in the coming years), a temporary storage area for large volumes of spoil (previously the Lookout Centre) and a coastal boardwalk that runs through the site (Photograph 4-3). As of 2025, the Lookout Centre has been demolished, and the land is being utilised as a construction storage area (Photograph 4-1: ). | Other sites in the vicinity are already developed. |
| **Opportunity to enhance the area and integrate the site into the surrounding urban area** | The residential development of Mouille Point, the Water Club, and Green Point Park, and the commercial and retail development to the east of the site, and the V&A Waterfront suggest that mixed-use development including residential, commercial, and retail spaces on the site would be compatible with surrounding land uses. This proposed development would enhance the area and play a key role in providing continuity of the urban fabric along the coastline. | Not applicable to other sites in the area. |
| **Land demand in Cape Town** | Due to limited land availability in the Cape Town area and the growing population, the underutilised site is ideal for mixed-use development. Although expansion is restricted southwest by Fort Wynyard, a heritage site, the location offers a unique chance to add public amenities and enhance coastal resilience through land reclamation. Increasing population in nearby urban wards is driving demand for accessible residential, retail, and leisure facilities. | There are no other sites available that will be able to provide coastal amenities and boardwalk. |
| **Location in relation to** | The proposed Granger Bay development is located near the Cape Town CBD and key public facilities like the V&A Waterfront, Green | There are no other sites available close |

| Factor | Preferred site | Other sites owned by the applicant |
|---|---|---|
| **the CBD and public facilities** | Point Urban Park, and Sea Point Promenade. It will strengthen the area's tourism infrastructure and meet land use demands by providing a high-quality, mixed-use space for both residents and visitors. Its strategic location supports urban consolidation, liveability, and integrated services in Cape Town. | to the CBD as Granger Bay Precinct is the last to be developed. |
| **Location in relation to transport routes and opportunities** | The V&A Waterfront's transport strategy aligns with Cape Town's Transit-Oriented Development goals, focusing on improved public transport. As the area is already well-served by various transport modes, the Granger Bay Development will use existing services like MyCiTi buses, Park & Ride, and micro-mobility options. No major road upgrades are planned. The area also includes non-motorised transport facilities, such as a boardwalk connecting to the V&A Waterfront and Sea Point Promenade. | There are no other sites available close as Granger Bay Precinct is the last to be developed. |
| **V&A Waterfront Development Plan** | The V&A Waterfront comprises 11 precincts developed under a mixed-use concept combining industrial, recreational, cultural, and commercial functions (Figure 4-9). The V&A Waterfront has significantly boosted tourism and commercial opportunities in the Western Cape. Granger Bay is the final precinct to be developed, playing a key role in completing the original vision. It will offer mixed-use development, coastal amenities, and improved access, with long-standing plans for some land reclamation in the area. | Other sites referred to in the plan have already been developed. |
| **Alignment to plans and landowner willingness** | This opportunity to act on existing development rights in the V&A Waterfront area will allow the V&A Waterfront Company to pursue their objectives of completing the final precinct's construction. The proposed development is currently within the V&A Waterfront's existing available bulk rights. | Other sites in the Waterfront have already been developed. |
| **Spatial planning compatibility** | The proposed development aligns well with the Provincial Western Cape Spatial Development Framework (2014), City of Cape Town Spatial Development Framework (2023) and the Table Bay District Spatial Development Framework (2023) by promoting spatial efficiency, sustainability, and strategic investment; by contributing to the area's role as a vibrant coastal destination and; by promoting land use compatibility through a blend of residential, commercial, and public spaces in a high-value, economically strategic area.<br><br>This proposed development also aligns with the Granger Bay Precinct Plan (2014), which was approved by the City of Cape Town. Further information regarding the abovementioned spatial development frameworks can be found in Chapters 2 and 5. | Not applicable to other sites. |
| **Socio-economic potential** | The construction phase of the Granger Bay development will generate temporary economic benefits through job creation, increased business activity, and higher household incomes. In the long term, the operational phase will provide sustained economic growth through ongoing demand for services, stable employment, and regional development. As part of the V&A Waterfront, one of South Africa's top tourist attractions, the project will enhance tourism by extending the promenade, improving pedestrian access, and adding retail, leisure, and public spaces that align with modern tourism trends focused on walkability and coastal experiences. | Not applicable to other sites. |
| **Availability of bulk services** | The existing water, sewer, and waste infrastructure can accommodate the proposed Granger Bay development. The Beach Road water main and the City of Cape Town's bulk water system have sufficient capacity to meet the estimated demand. The sewer | Not applicable to other sites. |

| Factor | Preferred site | Other sites owned by the applicant |
|---|---|---|
| | network and Green Point Marine Outfall can handle additional wastewater, and the V&A Waterfront's Waste Handling Centre can manage the extra solid waste. Stormwater systems will be extended and designed to manage storm surges, requiring no upgrades to the City's existing system. | |
| **Synergies and overlap** | This site provides a unique opportunity to meet several needs including coastal protection, provision of coastal public amenity, alignment with historical plans and the provision of socio-economic benefits, simultaneously. | Not applicable to other sites. |

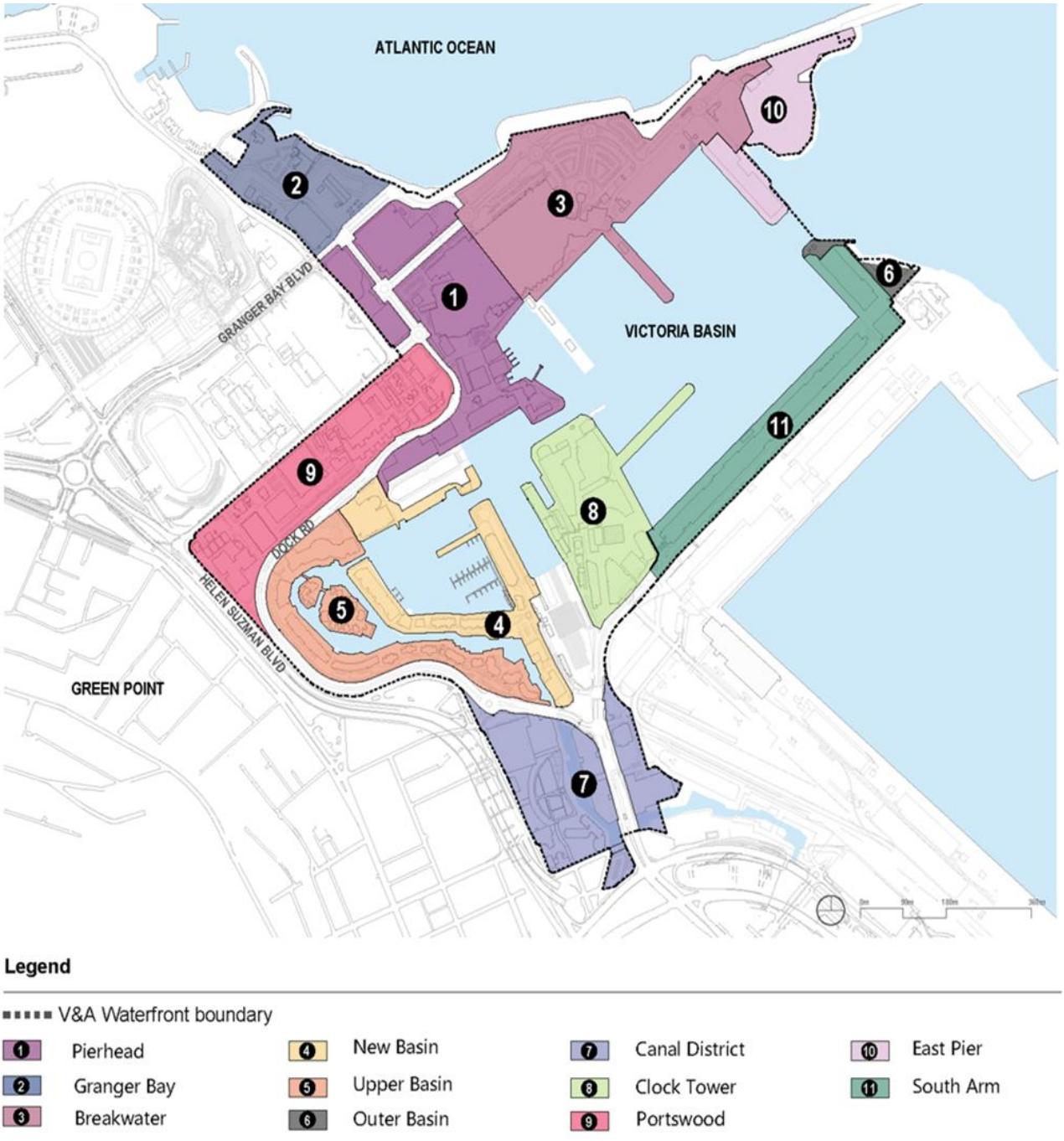
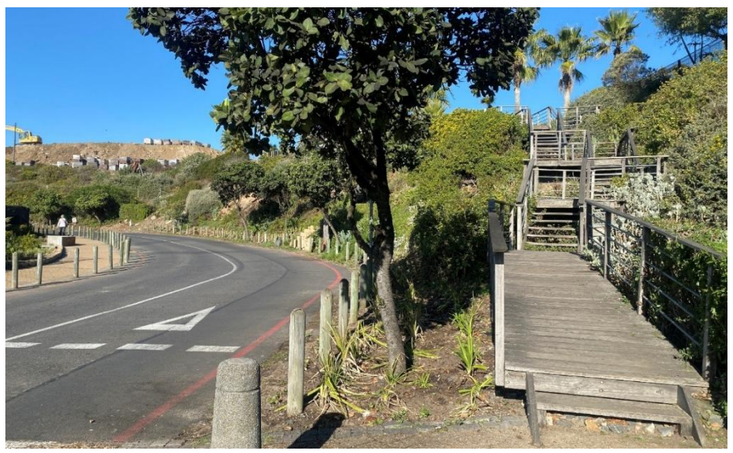



**Figure 4-9: V&A Waterfront Precincts**

Photograph 4-1: The previous Lookout Centre is currently utilised as a construction storage area



Photograph 4-3: Boardwalk through the site on the left and surfaced sidewalks on the right

Photograph 4-2: The gravel beach east of the site

Photograph 4-4: Overtopping of rock revetment at approximately 15:00 on 13 July 2020. Photo credit: Stephen Luger (PRDW, 2023)

Photograph 4-5: Overtopping in front of Grand Café and Beach on 13 July 2020 (exact time unknown). Photo credit: Anton Holtzhausen (PRDW, 2023)

### 4.6.2 Other Site Alternatives

No site alternatives will be further considered in this Scoping and EIA process, as the proposal stems from a long-established plan to develop the Granger Bay precinct as a primarily residential area, and to stabilise the coastline. Therefore, no other site alternative is relevant to the project. Additionally, this section of the V&A Waterfront's coastline is the only area that does not have a permanently engineered edge.

## 4.7 Land Use Alternatives

No land use alternatives are being considered in this Scoping and EIA process as the appropriateness of the proposed land use is framed in terms of the allocated development rights for the entire V&A Waterfront. This proposal will utilise 78 000m² of the existing V&A Waterfront bulk rights. An appropriate mix of land uses within the precinct will be facilitated by a more detailed level of planning and design following this EIA process.

### 4.7.1 Design/Development Footprint Alternatives

The following section describes the alternatives and provides the rationale for the screening out of certain alternatives.

#### 4.7.1.1 Previously considered layout

**Straight-Line Revetment (2018 Scheme – Already Authorised)**

The straight-line revetment as proposed in the 2018 Scheme included land reclamation with public spaces, and development of building packages only on existing land. The dominant land use proposed in the 2018 Scheme largely reflected residential development with a variety of accommodation types, including hotels, serviced apartments, and private apartments. Provision was made for restaurants and limited retail. An area was retained for residents of the precinct between the proposed development packages and was planned to be landscaped with pedestrian paths and outdoor seating areas. Additionally, a 30 m wide pedestrian path was to provide continuous public access from Beach Road to and along the coast for over 1 km. This coastal route consisted of a paved pedestrian walkway with appropriate planting (Figure 4-10).

A dolos revetment was planned to be extended in a straight line from the existing revetment for approximately 310 m. The embankment was to be replaced with a rock revetment over approximately 160 m. This coastal armouring was to be accompanied by land reclamation of around 2.4 ha. This proposed coastal infrastructure aimed to provide necessary protection for existing and future development in this precinct.

The architecture of the buildings was designed to respond to the coastal setting and the desire to maximise outward views to the sea. Outdoor terraces were envisaged in these buildings. Building heights were to be in accordance with parameters established under the 2011 Heritage RoD.

This proposed layout offered significant socio-economic opportunities but also presented potential impacts on the marine environment. Despite providing protection to the shoreline, this layout had more limited opportunity for coastal access and public amenity. Therefore, it carries socio-economic opportunity costs related to:

- Increased tourism and economic activity,
- Improved access to the coast,
- Enhanced ecotourism and wildlife-related activities,
- A stronger sense of place, and
- Greater public amenity value.

**Since 2018, the client has revised the original layout and undertaken detailed engineering studies to inform the development of a new layout. This updated layout is considered technically feasible and more responsive to the economic and social needs of the development. As such, the 2018 Scheme will not be subject to further assessment in this Scoping and EIA process.**

#### 4.7.1.2 Alternatives being considered

##### 4.7.1.2.1 Alternative 1: No-go Alternative

In the case of the "No-Go" Alternative, the status quo will remain. The site will continue to be utilised as a parking area, and the other activities currently taking place on site, including the Grand Café & Beach restaurant, and Oceana Power Boat Club slipway, will continue to operate, subject to their lease agreements and other approvals (Figure 4-11).

The impacts associated with the site in its current state and future state, should it remain undeveloped, include the degradation of artificial habitats due to weather events and the subsequent impact on marine species inhabiting these artificial habitats (e.g., West Coast rock lobster); and the degradation of the coastal infrastructure (e.g., Cabo Beach Club and Café) by weather conditions (e.g., flooding, storm surges, and erosion), which will affect the visual sense of place, public amenity value, and tourism in the area.

In addition to the abovementioned impacts, the No-Go option (i.e., continue maintaining the existing embankment and rubble beach in its current condition) is associated with escalating annual maintenance costs and an unacceptable risk to property and public safety.

The no-go alternative will have socio-economic opportunity costs[‡] related to:

- Increased tourism and economy,
- Improved access to the coast,
- Improved ecotourism and wildlife-associated activities,
- Improved sense of place,
- Increased household income
- Increased government revenue
- Improved linkage with the V&A Waterfront and City of Cape Town,
- Increased public amenity value, and
- Job creation.

##### 4.7.1.2.2 Alternative 2: Proposed development footprint with land reclamation and coastal public space (Preferred Alternative)

Alternative 2, the maximum development footprint, proposes to maximise the developable area on the Granger Bay precinct site and includes land reclamation (Figure 4-12).

The intention was always to undertake development that was primarily residential in nature in the Granger Bay precinct and to stabilise the coastal edge. This part of the V&A Waterfront lends itself particularly well to the land uses proposed, and also, the coastal edge is the only remaining coastal edge within the V&A Waterfront that does not have a permanent, engineered edge. As a coastal precinct and with the potential to link the V&A Waterfront with the existing city coastal promenade,

[‡] Opportunity cost is defined as the implicit cost incurred by missing out on an investment, i.e., the potential benefits that are missed when choosing one alternative over another.

the design and implementation of a public coastal edge associated with new shore protection is a critical factor in the development of the Granger Bay precinct.

In order to preserve the sense of place of the site, the architecture of buildings will respond to the coastal setting and maximise outward views to the sea. Commercial and residential buildings will include outdoor terraces that face the ocean. On the street edge, and where more commercial buildings could be developed, a different, more urban architecture is proposed. Additionally, an exposed aggregate finish, like what is presently visible in the V&A Waterfront, will be added to the development infrastructure to ensure consistency in the V&A Waterfront and link the precincts.

Building heights will be in accordance with parameters established in terms of the 2011 Heritage RoD and 2015 VIA. Within the view arc, no buildings will be higher than 21,5 m or approximately 5 floors. Outside the view arc, towards the Beach Road/ GBB Ext. corner, building heights may be above the 5-floor level. Design parameters that emerge from the consultation underway with heritage authorities will also be considered and incorporated where relevant.

This alternative is associated with potential negative impacts on the marine environment, which include:

- The loss of natural rocky shore habitat footprint and loss of benthic habitat,
- Impacts on vulnerable marine species due to construction activities, increased vessel presence, and loss of habitat,
- Changes in marine system functioning due to a loss of habits, and
- Changes in local oceanography due to the breakwater and revetment construction.

However, this alternative is also associated with significant socio-economic opportunities.

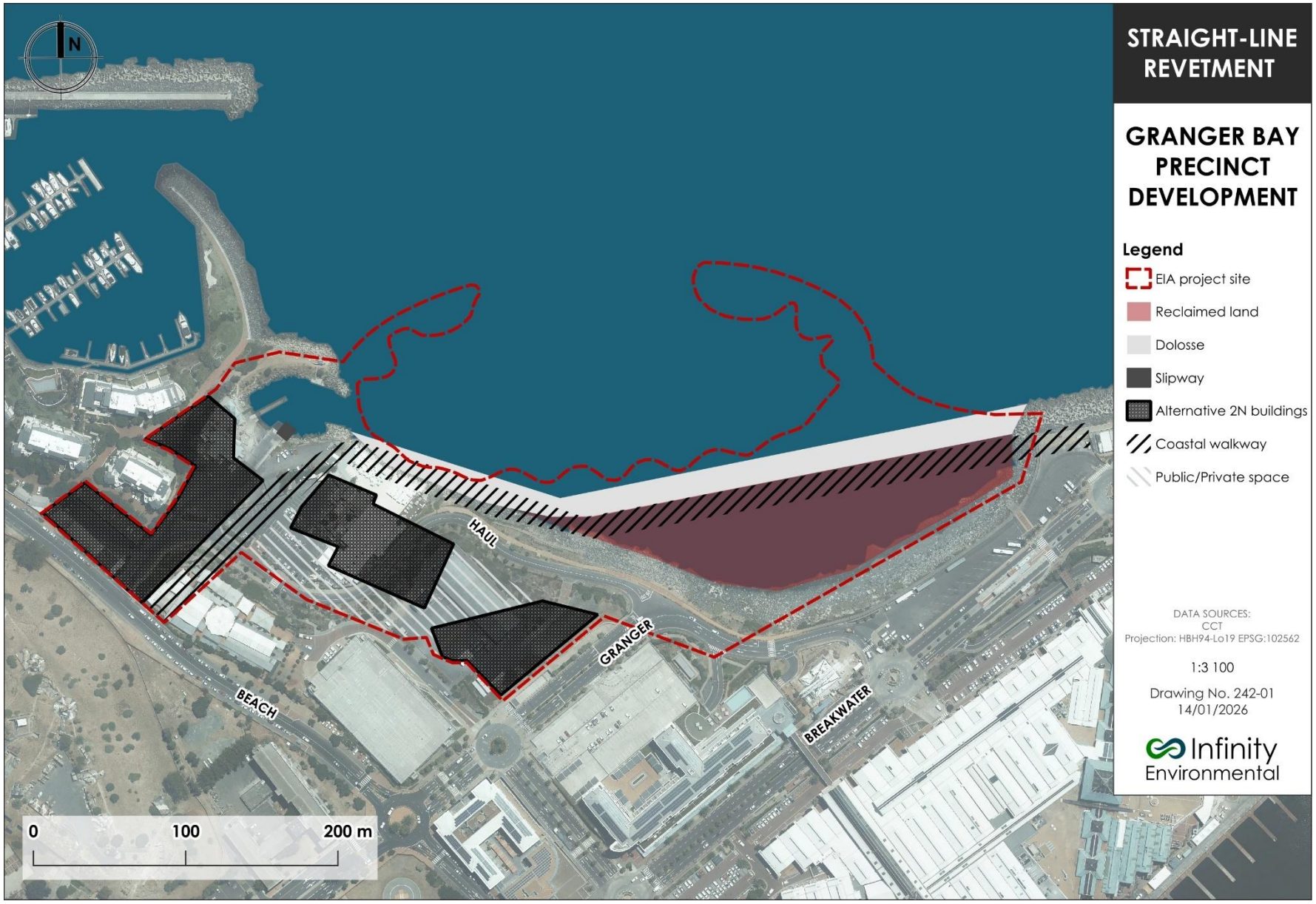



**Figure 4-10: 2018 Scheme: Straight-line revetment with more limited public space and access to the water's edge**


**Figure 4-11: Alternative 1: No-Go Development**


**Figure 4-12: Proposed design Alternative 2: Proposed Development Footprint with Public Space**

## 4.8 Concluding Statement of Preferred Alternative

As mentioned above, there are no site and land use alternatives applicable to this development (see sections 4.6.2 and 4.7).

### 4.8.1 Design/Development Footprint Alternatives

The preferred development structure on the site has been determined based on socio-economic opportunities, alignment with spatial planning frameworks and long-term site viability (i.e., need for coastal protection).

Due to the long iterative process prior to 2025, the concept design outlined in this report contains a significant level of detail. However, the concept design will be further developed based on feasibility and refined based on detailed transport, heritage, socio-economic, marine, oceanographic, climate change and engineering specialist assessments.

Alternatives considered in the Scoping Phase are summarised below:

» **Alternative 1: No-Go alternative:** The no-go alternative assumes that the proposed development will not go ahead. Although this alternative would not result in environmental impacts on the proposed site or local area, it would include the socio-economic opportunity costs and an unprotected coastline vulnerable to erosion. The unprotected coastline may have significant impacts over the long-term as the site is not appropriate for development and unsafe for the public because of weather events. Site deterioration due to poor coastal protection may have an impact on the surrounding heritage resources. The no-go alternative provides a baseline against which the other alternative will be compared and considered during the EIA.

» **Alternative 2: Proposed development footprint with land reclamation and coastal public space (Preferred Alternative):** This alternative proposes to maximise development on the site and includes land reclamation to provide coastal protection, increase coastal public amenities and improve coastal access. This alternative is expected to have significant impacts on the environment, specifically on marine habitats and vulnerable marine species in and surrounding the site. Heritage resources surrounding the site may be affected by this alternative. However, this alternative will maximise socio-economic benefits by improving accessibility and providing spatial integration.

# CHAPTER 5
# NEED AND DESIRABILITY

**January 2026**

**Final Scoping Report**

Infinity Environmental

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# 5 NEED AND DESIRABILITY

This chapter presents a description of the rationale and motivation for the proposed development. It outlines key aspects of the 'need and desirability' of the proposal, as required by the EIA Regulations.

The consideration of "need and desirability" of a proposal is a key part of environmental impact assessment, which relates to the context, broader societal needs, and the public interest. Although not defined in NEMA, need and desirability are generally considered to relate to:

(a) The economic and/or societal benefit likely to be conferred by a proposed development, and
(b) The policy and spatial planning context, which relates to whether an activity is being proposed at the right time and in the right place.

The sections below are based on the Guidelines for Need and Desirability (DEA, 2014) and set out the key considerations motivating the need and desirability of the project proposal. This chapter will be further informed and expanded on in the Environmental Impact Assessment Report. This chapter should be read in conjunction with Chapter 2, which sets out legislation, policy, and planning contexts in which the project is proposed, and Chapter 6, which describes the anticipated impacts of the project.

## 5.1 Planning and Development Suitability

The Need and Desirability Guidelines (DEA, 2014) require that planning and development consider the broader community's needs and note that 'What is needed and desired for a specific area should primarily be strategically and democratically determined beyond the spatial extent of individual EIAs. The strategic context for informing need and desirability may therefore firstly be addressed and determined during the formulation of the sustainable development vision, goals and objectives of Municipal Integrated Development Plans ("IDPs") and Spatial Development Frameworks ("SDFs") during which collaborative and participative processes play an integral part, and are given effect to, in the democratic processes at local government level.'

The following sections describe the spatial planning frameworks applicable to the proposed site.

### 5.1.1 Western Cape Spatial Development Framework (2014)

The proposed development is located within a high-potential urban node, and the development optimises existing infrastructure, supports economic intensification, and enhances public access along the coastline. The proposed development, therefore, aligns well with the Western Cape SDF by promoting spatial efficiency, sustainability, and strategic investment. It contributes to sustainable development by providing a mix of residential, commercial, and recreational spaces in an accessible area, while incorporating environmental considerations through coastal protection, land reclamation, and non-motorised transport infrastructure.

### 5.1.2 City of Cape Town Spatial Development Framework (2023)

The approved 2023 Municipal Spatial Development Framework (MSDF) is a framework for long-term growth and development, and includes a spatial vision, policy parameters and development

priorities to support Cape Town achieving a reconfigured and inclusive spatial form and structure. The MSDF guides infrastructure investment, urban growth, and sustainable land use. It emphasises three spatial strategies: (1) building an inclusive, integrated, and vibrant city; (2) managing urban growth while balancing development and environmental protection; and (3) improving access to economic opportunities.

The V&A Waterfront is identified in the MSDF as a coastal node and is identified for intensified use within the Urban Inner Core of the City, in which intensification and densification of uses are prioritised. Coastal nodes are typically also destination places (i.e. areas of attraction on the coast) and within the growing, denser parts of the city. Existing and future coastal nodes include a range of functions, from businesses (shops, services and restaurants), and social facilities (recreation and resorts) to residential developments. Coastal nodes are usually associated with forms of development that support their function as a point of attraction, rather than detracting from it. Nodes should make responsible use of the social and economic benefits of the coast, certain public spaces, and historical and biophysical assets. They have been identified in locations that allow natural systems to function sustainably and are protected from flood risk. In these areas, public access must be preserved or actively enhanced.

The proposed development aligns with the MSDF's spatial strategies by contributing to the area's role as a vibrant coastal destination. The proposed development includes recreational, commercial and residential opportunities, and public access is prioritised in the design of the boardwalk and public pools that characterise the proposed section of reclaimed land. Due to the mixed-use and multi-functionality of the proposed development, it is expected to attract both locals and tourists. The proposed development includes diverse land uses, enhances the tourism offering, improves public access to the waterfront, and promotes responsible coastal development.

### 5.1.3 Table Bay District Spatial Development Framework 2023 (DSDF)

Table Bay is the economic heart of Cape Town, encompassing the Central Business District (CBD), the V&A Waterfront, major transport hubs, and significant tourism assets. The DSDF recognises this centrality and aims to guide development in a manner that promotes efficient land use, protects environmental and heritage resources, and enhances social equity.

In terms of the Table Bay District SDF, Sub-district 1, the V&A is identified for 'potential mixed use' (refer to Figure 2-2), which refers to the possibility of developing areas that incorporate various land uses, such as residential, commercial, and retail, within the same location. The proposed development at Granger Bay aligns closely with the objectives of the Table Bay District Spatial Development Framework (DSDF). It promotes land use compatibility through a blend of residential, commercial, and public spaces in a high-value, economically strategic area. Its location within the V&A Waterfront supports the DSDF's emphasis on accessibility and transit-oriented development, while also reinforcing the Waterfront's role in Cape Town's visitor economy. By fostering job creation and enabling diverse commercial activity, the project advances the DSDF's economic development goals. Furthermore, it supports spatial integration by enhancing the existing urban fabric without contributing to urban sprawl.

### 5.1.4 City of Cape Town Local Municipality Integrated Development Plan (2022 – 2027)

The proposed development directly supports the City of Cape Town's IDP 2022–2027 priorities of economic inclusion, resource efficiency, and building integrated communities by intensifying land use within a key urban node already equipped with infrastructure and transport connections. In planning for "shared economic growth and development", one of the objectives of the City's

Integrated Development Plan (IDP) is to "ensure that Cape Town continues to grow as an opportunity city". As part of this objective, a key goal is to attract investment and create jobs.

As a major tourism, leisure and commercial destination, the V&A Waterfront's daily working population is in the order of 16 000 (including the fishing industry), and further development should see this number increase in the near future.

Located within the V&A Waterfront, a high-value mixed-use precinct, the development advances the City's vision of a compact and transit-oriented urban form by promoting pedestrian access, non-motorised mobility, and proximity to MyCiTi and other public transport. By integrating residential, retail, and public space components, the project contributes to inclusive economic growth, supports tourism, and reinforces Cape Town's positioning as an "Opportunity City" with sustainable urban regeneration at its core.

### 5.1.5 Other municipal policies

The proposed development aligns with three of Cape Town's long-term sustainability policies, including: The City of Cape Town's Climate Change Strategy (2021), Environmental Strategy for the City of Cape Town (2017) and the Integrated Coastal Management Policy of the City of Cape Town (2014).

#### 5.1.5.1 City of Cape Town's Climate Change Strategy (2021)

**Goal 6: Take action to reduce flood risk and storm damage through disaster mitigation approaches**

The oceanographic study includes wave transformation modelling of storm conditions. Various mitigation measures are included to reduce the risks associated with wave reflections and the replacement of the existing unprotected embankment and gravel beach in the form of a permanent rock revetment and two breakwaters ensure shoreline protection, as well as providing shelter for portions of the site from storm action.

**Goal 7: Promote coastal resilience to the benefit of both coastal communities and coastal ecosystems**

The development is expected to enhance inclusive coastal access and contribute to broader public benefit if implemented with due attention to access equity, local employment prioritisation, and support for small enterprises. These aspects align with key sustainability principles outlined in the National Environmental Management Act (NEMA) and the Integrated Coastal Management Act (ICMA), supporting the promotion of socially and economically inclusive development. The replacement of the existing unprotected embankment and gravel beach, a permanent rock revetment and two breakwaters, will be established to ensure shoreline protection and provide shelter from storm action. It will also enable direct public access to the water, which is currently inaccessible due to the nature of the current shoreline.

A Climate Change Impact Assessment will also be undertaken to ensure climate change-related risks are assessed and mitigated or adapted for.

#### 5.1.5.2 Environmental Strategy for the City of Cape Town (2017)

The City's Environmental Strategy, 2017, applies to decision-making by the City of Cape Town and determines a set of 'desired outcomes' in relation to its vision to '*enhance, protect and manage Cape Town's natural and cultural resources for long term prosperity, in a way that optimises economic opportunities and promotes access and social well-being*'. The proposed development seeks to improve public access to the coastline, to secure the natural functioning of coastal

processes, protect sensitive coastal ecosystems, and provide protection from dynamic coastal processes, including sea level rise. The draft Marine Impact Assessment notes that safer and more formalised access to the marine edge could enhance user safety and environmental management compared to the current ad hoc use patterns.

5.1.5.3 Integrated Coastal Management Policy of the City of Cape Town (2014)

The Integrated Coastal Management Policy, 2014, is intended to reduce risk to the City and its communities and is core to retaining and enhancing the many current and future economic, social and environmental opportunities of the City's unique coastline into the future. The principles determined in the Integrated Coastal Management policy also compliment and support the principles defined in the National Integrated Coastal Management Act, to which the City is legislatively bound by. The policy directive details outline how:

» The coastline is a **common asset**, a shared space and unique natural and cultural environment which belongs to all South Africans

  The proposed development centres on the reclamation of approximately 3.2 hectares of land from Table Bay, to accommodate new coastal public amenities and new mixed-use development. The proposed development includes anticipated improved employment prospects, enhanced public access to the coast, and broader urban upliftment.

» Equitable **access** to the coast is a priority while ensuring that this access is regulated, organised and controlled in a manner that does not detract from or negatively impact on the coastal environment while also ensuring ease of access for all.

  Public access is a core aspect of the proposed development which includes the construction of new public amenities such as the new bay, providing sheltered waters for boating, kayaking, and swimming. Land-based amenities will include a coastal public walkway, a slipway, a fixed quayside, landscaped promenade, tidal pools, pedestrian paths and open areas. The proposed development includes a new slipway to replace the existing slipway and new sheltered public waters in the proposed bay. Access to a functioning slipway is expected to be retained throughout the construction process by constructing a new slipway before the closure of the existing one. Details of the operational management of this facility will be considered by the applicant to ensure continued accessibility and provision for maintenance and upkeep.

» The coastline underpins much of Cape Town's economy and holds significant potential to contribute further **economic growth and social development opportunities** in Cape Town. However, the economic and social value of the coastline must be finely managed as poor decision making, poor management, prioritising short terms gains, over-development or inappropriate development can substantially diminish current economic and social value while removing or reducing the potential for any future economic and social opportunities.

  The proposed Granger Bay development is anticipated to act as a strategic driver by injecting short-term capital expenditure during construction and promoting long-term economic growth through enhanced residential, commercial, and tourism activity. As Cape Town seeks to strengthen its economic resilience, integrated mixed-use developments in high-value urban nodes can contribute meaningfully to Gross Value Added expansion and inclusive growth.

» **Coastal recreation** takes many forms and is one of the largest social activities in Cape Town. Coastal recreation underpins a range of economic activities in Cape Town and provides significant social development value.

New public amenities associated with the proposed development include the new bay, providing sheltered waters for boating, kayaking, and swimming. Land-based amenities will include a coastal public walkway, a slipway, a fixed quayside, landscaped promenade, tidal pools, pedestrian paths and open areas.

» In order to reduce coastal risk, especially given the future impacts of climate change on sea level rise and increased frequency and intensity of coastal storm surges, it is imperative that we maintain a healthy **functioning coastline**. By maintaining the integrity of the coastline, the economic, social and value of the coast will be optimised.

The replacement of the existing unprotected embankment and gravel beach with a permanent rock revetment and two breakwaters will provide shoreline protection, as well as shelter for portions of the site from storm action. A Climate Change Impact Assessment will also be undertaken to ensure climate change-related risks are assessed and avoided where possible.

» Cape Town's coastline has a varied and rich history, spanning several millennia. It is integral to our **history, heritage, sense of place and unique identity**. In addition, the coastal landscapes underpin the City's scenic routes, global desirability and recognition.

In terms of the 2011 Heritage Record of Decision (RoD), the heritage significance of Fort Wynyard has been established and any development in Granger Bay precinct must respond to the aspects described in the RoD, including that a 30m wide view corridor from the main gun emplacements to the coastline must be kept open to provide a sense of the link between the fort and Table Bay. The RoD also states that a public pedestrian route along the water's edge in Granger Bay is required, as such a route would be a major new city amenity, which would provide an opportunity to view two World Heritage Sites (Robben Island and Table Mountain) from this coastal setting. The proposed development aligns with this as it includes a coastal public walkway, and the height of buildings is limited to 21.5m above mean sea level [MSL] to maintain key views within the arc of fire (historic arc of fire from a gun emplacement at Fort Wynyard).

» **Risk management and mitigation** associated with coastal erosion and storm surges need to be appropriate and sustainable, including multi-disciplinary approaches aimed at resolving and adapting to the expected impacts of climate change.

The replacement of the existing unprotected embankment and gravel beach with a permanent rock revetment and two breakwaters will provide shoreline protection, as well as shelter for portions of the site from storm action. The Climate Change Impact Assessment will guide design elements, where required.

### 5.1.6 Land Use

The proposed site is transformed and contains recreational, commercial and retail opportunities. However, the proposed site is underutilised and in a degraded condition, despite being in a prime location, and therefore appropriate development could help to enhance the area and play a key role in providing continuity of both the urban fabric and a pedestrian route along the coastline, linking Mouille Point with the V&A Waterfront.

The site is mainly vacant, and portions are leased by tenants, including the Oceana Power Boat Club and its boat launching facility; the Grand Africa Café and Beach events venue in an old warehouse and a series of temporary structures; the previous location of the Oranjezicht Farm Market; and a demountable 3-storey parking facility. The Lookout events and hospitality facility has been demolished. The site is otherwise in a derelict state, mostly used by the V&AW for the temporary storage of large volumes of spoil.

The marine and coastal environment within the proposed site consists of a gravel beach and dolosse revetments along the coastline to dissipate waves, with a slipway to launch boats and a small dock in front of the Oceana Power Boat Club. Oceana Power Boat Club has a launching facility for motorised and non-motorised watercraft that is open to the public. There is also a storage/parking area for the Oceana Power Boat Club located in the western portion of the site.

### 5.1.7 Proposed Development Infrastructure

#### 5.1.7.1 Coastal Walkway

In respect of the public access to the water's edge, the coastal pedestrian walkway and boardwalk run for almost the entire length of the V&A Waterfront but is interrupted by the restrictions of the slipway operation and the Grand Cafe & Beach development. The proposed development will allow for an uninterrupted coastal boardwalk from the V&A Waterfront through Granger Bay to the Sea Point Promenade.

#### 5.1.7.2 Granger Bay reclamation infrastructure

Currently, the Granger Bay coastline is subject to erosion, specifically on the unprotected embankment and gravel beach. The proposed Granger Bay reclamation will be developed with breakwaters and permanent rock revetments to protect from wave action and coastal erosion, therefore ensuring long-term protection for coastal infrastructure. The Granger Bay area will be a coastal public zone, with a variety of recreational uses including boating, kayaking and swimming. There will be public access to the shoreline, open spaces and the envisioned swimming pool facilities in the bay. Ancillary infrastructure such as changing and ablution facilities will be provided, to designs confirmed as part of the detailed design phase.

#### 5.1.7.3 Mixed-use Development Space

As previously mentioned, the site is underutilised and should be developed as a public amenity given its prime location. Mixed-use development is proposed to frame this coastal amenity. This will comprise residential, hotels, leisure, and some commercial development. The types of residential accommodation being considered include hotels, serviced apartments, and private apartments. The layout of the mixed-use development is intended to promote uses and activities that could take advantage of the ocean location of the site.

#### 5.1.7.4 New Public Slipway

The slipway will be reconstructed in a new location and will remain a public launch site, along with ancillary facilities (parking, etc.) necessary to its function. Access to a functioning slipway is expected to be retained throughout the construction process by constructing a new slipway before the closure of the existing one.

The existing slipway is managed by the Oceana Power Boat Club. Institutional considerations regarding the management of the new slipway have not yet been confirmed; the requirements of all users of the slipway are to be considered. Details of the operational management of this facility

will be considered by the applicant to ensure continued accessibility and provision for maintenance and upkeep. Ultimately, the intention is to maintain public access to the slipway both during the construction and operational phases and improve launching conditions within a sheltered bay.

The proposed bay formed by the two breakwaters is modelled to be safe for small craft under most conditions, and to have wave velocities and heights very similar to those in the existing slipway area. The current speeds in the new Granger Bay due to wind, tides, and ocean currents are projected to be a maximum of 0.06 m/s in summer and 0.02 m/s in winter (PRDW, 2023; Appendix G).

## 5.2 Ecological and Environmental Considerations

According to the Need and Desirability Guidelines (DEA, 2014), ecological and environmental factors, including the assessment of threatened ecosystems, potential impacts and mitigation measures, the impacts on people's environmental rights, and long-term sustainability measures, need to be considered during the design process, Scoping and EIA phases. The following sections describe some of the ecological and environmental factors considered.

### 5.2.1 Biodiversity Protection

Ecological impacts will be assessed in the Environmental Impact Assessment (EIA) Report. Oceanographic, marine and marine mammal specialist assessments will determine the specific impacts on the ecological integrity of the area. For details of these findings, refer to Chapter 6.

### 5.2.2 Environmental Impacts

Specialist studies, including the Marine Mammal Impact Assessment, Marine Ecology Specialist Impact Assessment, and Oceanographic Specialist Impact Assessment have evaluated the ecological and oceanographic implications, respectively, of the proposed developments. These are detailed in Chapter 6 of this report. A Climate Change Impact Assessment will also be conducted as part of the EIA phase of the process.

In general, the impacts are anticipated to be negative, but with significances ranging from Insignificant to Very Low Negative after mitigation. Conversely, the no-go alternative would entail maintaining the current status quo within Granger Bay; thus, none of these negative construction phase impacts would occur. Ecological issues and impacts are further described in Chapter 6 and in the draft specialist impact assessments (Appendix D).

### 5.2.3 Environmental Impact Management

Where impacts cannot be avoided, specialists have provided mitigation measures to remedy, mitigate and manage impacts to acceptable levels. Where impacts are positive, enhancements to the impact may be provided. Mitigation measures have been identified in Chapter 6 of this report. The EIA Report, specialist studies, and Environmental Management Programme will provide further detail on impacts and mitigation measures/enhancements.

### 5.2.4 Environmental Rights

The construction phase of the proposed development may negatively impact coastal access rights by limiting access to the coastal and marine environment during the land reclamation process. However, only very limited access is currently possible, and the proposed development will increase access to the coast and provide public amenities in the operational phase.

Pollution prevention and mitigation measures will be implemented during the construction phase to ensure people's right to a healthy environment and to prevent ecological degradation. Moreover,

mitigation measures will be implemented during construction to prevent potential harm to people's well-being or health.

## 5.3 Heritage considerations

According to the Need and Desirability Guidelines (DEA, 2014), heritage resources, including site history, heritage context, previous heritage approvals, potential impacts, and mitigation measures, need to be considered during the design process, Scoping and EIA phases. Refer to Chapter 3 for a description of the heritage context and the resources of provincial and local heritage significance surrounding the site, and to Chapter 5 for a summary of identified heritage-related impacts.

The site does not contain any National or Provincial Heritage Resources; however, the primary character component of any significance present is the spatial and visual contact with the water's edge (Graded as IIIA). Moreover, the Oceana Powerboat Club slipway has social significance as a launching facility for communities forcibly removed from Cape Town during apartheid. These heritage resources will not be negatively impacted by the proposed development, as the spatial and visual contact with the water's edge will be enhanced, and an upgraded slipway will be retained in a new location.

Visibility from Beach Road, Fort Wynyard, Somerset Hospital, the Water Club, and the Radisson Hotel breakwater will be affected during the construction phase of the development. Therefore, this development may temporarily impact these heritage resources surrounding the site during the construction phase of the proposed development. The heritage specialist will provide mitigation measures to reduce the impact of construction on the surrounding heritage resources in the Heritage Impact Assessment. Additional considerations may be required, which will be considered and implemented once the consultation process with the heritage authorities has concluded.

## 5.4 Socio-Economic Considerations

The Need and Desirability Guidelines (DEA, 2014) require the consideration of socio-economic impacts, including job creation, and allow for the fair distribution of benefits and burdens and fair public participation during the Scoping and EIA. The following sections describe the socio-economic impacts.

### 5.4.1 Job Creation

Job creation is defined as the number of additional jobs created by economic growth; this includes jobs in planning and constructing the facility, and sustainable jobs at the facility once it is operational. Indirect and induced job creation will also occur because of direct job and income creation. The socio-economic specialist estimated the number of jobs that will be created during the construction and operational phases:

» The construction phase is expected to create **approximately 26 929 jobs**, including 5 855 direct jobs, 14 122 indirect jobs, and 6 952 induced jobs. Based on the total estimated employment, approximately 16% of jobs are expected to be highly skilled, 38% skilled, and 46% semi-skilled or unskilled. This breakdown reflects labour-intensive jobs with a diversity of skills typically required during large-scale construction projects.

» The operations are expected to **support a total of 5 105 jobs annually**, comprising 3 561 direct jobs, 621 indirect jobs, and 923 induced jobs. Based on the total employment, approximately 17% of the jobs will be highly skilled, 35% skilled, and 48% semi-skilled or unskilled. This reflects the staffing structure typical of mixed-use commercial operations, where a larger proportion of

employment opportunities are accessible to lower- and mid-skilled workers, while still accommodating roles requiring specialised expertise.

### 5.4.2 Production and GDP

Gross Domestic Product (GDP) refers to the value of all final goods and products produced during a one-year period within the boundaries of a specific area, as a direct, indirect, and induced result of activities for/at the precinct during planning, construction, and operation. The socio-economic specialist estimated the total production and GDP that will be generated during the construction and operational phases:

» The construction of the proposed development will generate approximately **R24.201 billion in total production**, with R9.915 billion coming from direct effects, R8.785 billion from indirect effects, and R5.502 billion from induced effects. This increase in output will also contribute to the GDP, with direct effects adding R3.229 billion, indirect effects contributing R3.375 billion, and induced effects generating R2.221 billion, totalling **R8.825 billion in GDP**.

» The operational phase of the proposed development is expected to generate approximately **R2 320 billion in total production output per annum**. This includes R1 081 billion in direct output from operations, R511.3 million in indirect output through suppliers, and R726.9 million in induced output driven by employee spending. This increase in production is projected to contribute **R1 188 billion to GDP annually**, with R684.7 million from direct effects, R209.3 million from indirect effects, and R294.1 million from induced effects.

### 5.4.3 Public amenity space

The proposed development will include a variety of public amenities such as:

» A 9-metre-wide coastal promenade extending over approximately 750 metres of Granger Bay's shoreline to improve non-motorised coastal access and support recreational activity (e.g., walking, cycling, and leisure use). This promenade will link with the existing Sea Point Promenade and V&A Waterfront public spaces, which will create a regional recreational corridor. To enhance the planned public space, the development will include inclusive access, provide lighting, programming and provide safety designs.
» Spaces (i.e., permanent stairs and sitting areas) to improve access to the coast for local communities, promoting inclusive use of the coastal space and providing for recreational activity (e.g., swimming, kayaking and stand-up paddle boarding).
» Provision of a coastal 'sea park', with tidal pools, a swimming pool and walkways along the breakwater infrastructure. The seawater in the tidal pools will be replenished periodically with seawater pumped from within the revetment.
» A quay with permanent steps to provide a space to bring the community closer to the sea and offers a versatile recreational area to accommodate a variety of activities such as food markets, concerts and theatrical performances. The quay walls will also provide space for power boats and sailboats. The quay wall will also allow for the installation of temporary walk-on moorings for events during summer and autumn seasons.

The public is entitled to reasonable access to this coastal public property for their use and enjoyment as stipulated in Section 13 of the National Environmental Management: Integrated Coastal Management Act 24 of 2008. Accordingly, the abovementioned coastal public amenities will provide for reasonable access by the public.

### 5.4.4 Tourism

As a part of one of South Africa's most visited destinations, the proposed mixed-use development at Granger Bay stands to positively influence Cape Town's tourism and visitor economy. By expanding the range of attractions, particularly through the addition of public waterfront space, improved visual aesthetics, enhanced walkability, and increased leisure facilities, the development will further strengthen the V&A Waterfront's role as a leading tourism node.

These additions are likely to extend visitor dwell time and repeat visitation, stimulate local hospitality and retail spending, and increase the area's attractiveness to international and domestic tourists. Indirect benefits may also accrue to Cape Town's brand image as a modern, vibrant, and accessible city, further boosting tourism-linked sectors.

### 5.4.5 Transport

The area is well-served by a range of public and private transport options. The MyCiTi Bus Rapid Transit system offers reliable services connecting the Waterfront to key destinations including the CBD, Table View, Airport, and surrounding suburbs. Minibus taxis and Golden Arrow buses provide additional connectivity for commuters from the Cape Flats, Southern Suburbs, and Northern Suburbs. For those using private vehicles, the surrounding road network ensures efficient access, while pedestrians and cyclists benefit from infrastructure that promotes walkability and non-motorised transport within the Waterfront and its surrounds.

In addition, the site's proximity to key transport hubs such as Cape Town Station (offering Metrorail services) enhances its regional accessibility, allowing for commuter flows from areas as far as Khayelitsha, Mitchells Plain, Bellville, and Strand. The nearby Cape Town International Airport, accessible via the N2, also supports national and international visitor access.

During the construction phase, temporary disruptions to traffic flow are anticipated along key access routes, including Granger Bay Boulevard, Beach Road, and the M61 (Helen Suzman Boulevard). The movement of heavy vehicles and potential partial road closures may lead to increased congestion, particularly during peak hours. To mitigate these impacts, it is proposed that deliveries are scheduled during off-peak hours, and clear signage and communication.

The following plan and framework align with the proposed development:

#### 5.4.5.1 City of Cape Town Comprehensive Integrated Transport Plan (2023 – 2028)

The CITP vision includes efficient access to transport, opportunities related to improved connectivity, financially, socially and environmentally sustainable forms of transport; and that all transport systems should be safe for all users. The CITP principles are pro-public-transport and NMT, connectivity and inclusivity. The V&A Waterfront's overall transport planning approach entails enhancement and improvement of public transport, in line with the City of Cape Town's transportation planning objectives and policies. To this end, development in Granger Bay will be serviced by a range of transport modes, including MyCiTi, Park & Ride, and micro mobility services, with improved integration between transport modes. Hence, no major access road upgrades are proposed.

#### 5.4.5.2 Transit Oriented Development Strategic Framework (2016)

In the context of this Strategic Framework, TOD is seen as a planning, design, and implementation approach that can be employed to address inefficiencies in the urban form of the city. The V&A Waterfronts overall transport planning approach entails enhancement and improvement of public transport, in line with City of Cape Town transportation planning objectives and policies, such as the TOD Strategic Framework (2016), which inter alia promotes new transport modes and integration with

public transport to improve accessibility for people of all income levels. To this end, development in Granger Bay will be serviced by a range of transport modes, including MyCiTi, Park & Ride, and micro mobility services, with improved integration between transport modes.

## 5.5 Governance and Public Participation

Public Participation is a critical informant of environmental assessment. Comprehensive, integrated, and thorough application of public participation facilitates and ensures informed decision-making by the competent authority. Comprehensive public participation ensures that all potential interested and affected parties are identified and notified of the proposed development, giving them an opportunity to register as interested and affected parties. Public consultation will be carried out as outlined in Chapter 7. The aim is to facilitate a transparent and inclusive process and to provide potential I&APs with sufficient information and opportunities to provide comments and participate in the process.

## 5.6 Long-term Sustainability

### 5.6.1 Sustainable Development

Sustainable development considers the environment's long-term health and restoration and ensures that it can continue to provide ecological services and benefits to future generations. In summary, sustainable development meets the needs of the present without compromising the ability of future generations to meet their own needs.

As this proposed development includes land reclamation and will take place near sensitive heritage resources, sustainable development is essential. Sustainable development in relation to the proposed development is outlined in Chapter 2, Section 2.3.6.

### 5.6.2 Climate Change

Climate change is a key factor for the long-term sustainability of this development, mainly because this development will involve land reclamation and the development of infrastructure near the current shoreline. Therefore, coastal protection infrastructure must be constructed to ensure the protection and long-term viability of the site during extreme weather events, especially with climate change expected to intensify.

Damage to coastal infrastructure from flooding is mainly the result of storm surges, increased tides, strong winds, and increased wave heights; climate change is expected to cause an increase in the frequency and intensity of weather events, storm surges, and climate change-induced sea level rise (Tadesse et al., 2022; Dasgupta, et al., 2009; Rahmstorf 2007). A Climate Change Impact Assessment will be undertaken as part of the EIA stage of the process.

### 5.6.3 Cumulative Impacts

#### 5.6.3.1 Marine and Oceanographic Impacts

Cumulative impacts arising from this development, when considered alongside other coastal and marine activities in Table Bay, will be assessed in the EIA. These include ongoing urban development, vessel movements, and pollution pressures. The cumulative pressures highlight the importance of coordinated coastal zone management and routine environmental monitoring to safeguard long-term ecosystem health. A Climate Change Impact Assessment will be conducted as part of the EIA phase of the process.

5.6.3.2 Socio-Economic and Traffic Impacts

The proposed Granger Bay mixed-use development will contribute both positive and negative impacts, which will interact with existing conditions in the surrounding area and other ongoing or planned developments. The project is set to strengthen local economic activity, create jobs, and improve public spaces, particularly in the context of the high-value V&A Waterfront area. These benefits, when considered alongside the wider socio-economic dynamics in Cape Town, are expected to provide significant uplift to the region's economy, particularly in tourism and retail.

The cumulative socio-economic challenges that may arise from this development, especially concerning traffic congestion, infrastructure demand, and potential environmental pressures, are the subject of separate specialist assessments and mitigation measures.

5.6.3.3 Visual and Heritage Impacts

The visual and heritage cumulative impacts will be assessed in a visual impact assessment forming part of the EIA.

## 5.7 Coastal public property considerations

Section 7C of the ICMA provides that applications for the reclamation of coastal public property for purposes other than state infrastructure may only be considered in exceptional circumstances, and only where such reclamation is not contrary to the purposes of coastal public property as set out in Section 7A.

In this regard, the circumstances motivating the proposed reclamation are considered to include the following:

**(a) Location dependency and absence of reasonable alternatives**

The proposed development is inherently location-dependent due to its functional and spatial relationship with the existing V&A Waterfront precinct and the coastline. Sections 4.6 to 4.8 demonstrate that there is no reasonably available terrestrial or previously developed land that can accommodate the proposed use while achieving the same objectives in respect of public access, coastal integration and socio-economic benefit. The need for reclamation therefore arises from site-specific constraints and opportunities.

**(b) Context within a highly modified urban coastal environment**

The proposed reclamation is located within an intensively developed and previously transformed urban coastal area. The proposal does not represent incremental encroachment into an undeveloped or sensitive coastline, and is distinguishable from reclamation proposals in largely natural coastal environments.

**(c) Consistency with the purposes of coastal public property (Section 7A of the ICMA)**

The proposal has been specifically designed to:

- improve public access to the seashore (Section 7A(a));
- assess impacts on, and protect sensitive coastal ecosystems through the EIA process (Section 7A(b));
- secure the natural functioning of dynamic coastal processes through informed design and mitigation (Section 7A(c)); and
- manage risks associated with dynamic coastal processes and sea level rise (Section 7A(d)).

**(d) Ability to manage environmental and coastal risks**

The comprehensive Scoping and EIA process, including specialist coastal, marine and climate-related studies, provides a mechanism to identify, assess and mitigate potential risks associated with reclamation. This provides an opportunity for decision-makers at national and provincial level to confirm whether the proposed development is consistent with the purposes of coastal public property.

On this basis, it is submitted that the proposed reclamation meets the threshold of exceptional circumstances contemplated in Section 7C of the ICMA, subject to confirmation through the EIA phase and the Minister's consideration of pre-approval.

## 5.8 Conclusions

The need for and the desirability of a proposed development must form the basis of the EIA. This chapter, read with Chapter 2, sets out the implications of the proposed development in the context of the various applicable spatial planning tools and policy, and establishes a framework for the consideration of the other key aspects of need and desirability, for further consideration during the EIA. The proposal is substantially in alignment with local and regional planning policies and frameworks, and its negative impacts will be fully assessed, and a recommendation on the need and desirability will be made in the EIA Report.

# CHAPTER 6
# ISSUES AND IMPACTS

**January 2026**

**Final Scoping Report**

Infinity Environmental

# 6 ISSUES AND IMPACTS

This chapter presents the significant issues and potential environmental impacts identified to date in the scoping phase. These impacts (and any others which may be identified during public participation) will be assessed during the EIA phase.

During the Scoping Phase, potential impacts and issues are identified and rated on a broad issue level and are regarded as preliminary. This is to allow for early input from all stakeholders, including the competent authority and interested and affected parties, in identifying additional impacts that may not have been considered and in defining the plan of study for assessment for the EIA.

A scoping-level identification of environmental impacts (physical, biological, social and economic) potentially associated with the proposed development is described in this chapter. The issues and impacts identified are based on a preliminary consideration of the current proposed alternatives as well as the status quo information presented in Chapter 3 of this report. The sequence in which these issues are listed is in no specific order of priority or importance. Specialist impact assessments are needed for many of the issues identified, and these assessments will be progressed and finalised during the EIA phase. Terms of Reference for specialist assessments are included in the Plan of Study for the EIA (see Chapter 8 of this Scoping Report).

Key issues are outlined in the following sections, followed by a preliminary discussion of potential impacts. The impacts will be quantified and assessed during the EIA Phase, and as further details on the proposed project design become available. It is also anticipated that inputs from interested and affected parties may further refine the identification and evaluation of impacts. Consideration of input received during the pre-application commenting period resulted in the addition of a Climate Change Impact Assessment and the amendment of the Transport specialist's terms of reference (detailed in Chapter 8 of this report).

## 6.1 Issues identification matrix

The consideration of issues and impacts for the Scoping process has been undertaken in accordance with the requirements of Appendix 2 of the EIA Regulations. The following aspects are taken into consideration:

- **Spatial extent:** The size of the area that will be affected by the impact or risk.
- **Intensity:** The anticipated severity (consequence) of the impact.
- **Duration:** The timeframe during which the impact will be experienced.
- **Probability:** The probability (likelihood or chance) of the impact occurring.
- **Reversibility:** the extent to which the impacts are reversible, assuming that the project has reached the end of its life cycle (decommissioning phase).
- **Potential mitigation:** available options for reducing the severity of an impact by avoidance, reduction, restoration or compensation.

The criteria that have been used to rank the identified issues and impacts are outlined in Table 6-1. The overall significance of an impact (Table 6-2) is rated based on the impact effect (which considers the extent, duration, intensity and probability of an impact) as well as the reversibility/mitigation of the identified impact (Table 6-1). The overall significance is either negative (in which case it will be as low, moderate or high) or positive (in which case it is reported only as beneficial at this stage).

**Table 6-1: Evaluation Criteria for the Impact Rankings**

| | |
|---|---|
| **Spatial Extent** | |
| **Site specific** | The proposed site |
| **Local** | The site and its immediate surroundings |
| **Regional** | Municipal or provincial level |
| **National** | National or international level |
| **Duration** | |
| **Short term** | Less than 5 years |
| **Medium term** | Between 5 – 20 years |
| **Long term** | More than 20 years |
| **Intensity** | |
| **Slight** | Slight impacts or benefits on the affected system(s) or party(ies) |
| **Moderate** | Moderate impacts or benefits on the affected system(s) or party(ies) |
| **Major** | Severe negative impacts or significant positive benefits on the affected system(s) or party(ies) |
| **Probability** | |
| **Improbable** | Little or no chance of occurring |
| **Probable** | 50% chance of occurring |
| **Highly Probable** | 50 – 90% chance of occurring |
| **Definite** | > 90% chance of occurring |
| **Mitigation** | |
| **Easily achievable** | The impact can be easily, effectively and cost-effectively mitigated |
| **Achievable** | The impact can be effectively mitigated without much difficulty or cost |
| **Difficult** | The impact could be mitigated, but there will be some difficulty in ensuring effectiveness and/or implementation, and significant costs |
| **Very difficult** | The impact could be mitigated, but it would be very difficult to ensure effectiveness, technically very challenging and financially very costly |
| **Reversibility** | |
| **High reversibility** | Impacts can be fully reversed |
| **Moderate reversibility** | Impacts can to a large extent be reversed |
| **Low reversibility** | Impacts can be slightly reversed |
| **Non-reversible** | Impact is permanent and cannot be reversed |

**Table 6-2: Issue-level Significance Ratings**

| Significance Ratings | Description |
|---|---|
| **LOW NEGATIVE** | The impact is acceptable, and mitigation is desirable for negative impacts, but not essential. The effects may be short-term, local or have a slight to moderate impact on the affected system or parties. |
| **MODERATE NEGATIVE** | The impact is important and requires mitigation if negative. Impacts of this nature may be acceptable depending on the need and desirability considerations. The effects may be medium to long term. |
| **HIGH NEGATIVE** | The impact is very significant and has a major, usually long-term effect. High negative impacts would usually be societally unacceptable unless effectively mitigated. |
| **BENEFICIAL** | The impact is positive. |

The evaluation of issues as described above is a means to prioritise which issues require further assessment and the development of mitigation measures:

» Negative impacts that are ranked as being of high significance will need to be investigated further to determine how the impacts can be minimised, or what alternative proposals or mitigation measures can be implemented.

» Negative impacts of moderate significance will require further investigation, assessment, and the development of mitigation measures.
» For negative impacts ranked as low significance, further assessment and mitigation may not be necessary. Management measures and monitoring may be required to ensure that the impacts remain of low significance.
» For potentially beneficial impacts, assessment may be required to determine the extent to which they affect the need and desirability of the proposal, as well as to consider measures for the enhancement of positive effects.

## 6.2 Potential Impacts Identified

Issues and impacts identified to date are set out in Table 6-3 in relation to the proposed development alternatives. Environmental issues are identified for the following phases of the development:

- Construction (C)
- Operational (O)

Decommissioning impacts are not considered due to the nature of the proposed development. The issues and impacts described in Table 6-3 are considered for each of the development alternatives proposed to date, which include:

- Alternative 1: No-go alternative
- Alternative 2: Maximum development footprint alternative

Scoping seeks only to identify and rank key issues to be addressed in the assessment phase. During the EIA phase, impacts will be assessed to more conclusively determine the nature, significance, consequence, extent, duration, and probability of these impacts.

The table overleaf has been slightly amended in the final Scoping Report to clarify the impact ratings assigned in line with the framework set out in 6.1 above. It is not the intention of the Scoping Report to provide detailed impact assessments or mitigation measures – this will be completed in the EIA Report, as set out in Chapter 8 (Plan of Study).

**Table 6-3: Potential issues and impacts identified for the proposed development**

| Issue | Phase | | Alternative 1 No-Go Alternative | Alternative 2: Proposed development footprint | Potential mitigation measures or enhancements | Further assessment |
|---|---|---|---|---|---|---|
| | C | O | Impact description and preliminary significance rating (without mitigation) | | | |
| **Disturbance of intertidal and subtidal artificial habitats during the construction phase**<br>The proposed development is anticipated to result in the direct loss of artificial rocky shore habitat. The draft Marine Impact Assessment indicates that development will result in direct mortality of these communities within the project footprint during the construction phase | X | | No impacts are anticipated.<br>***No Impact*** | Loss of artificial habitats, specifically the Granger Bay dolosse, and adjacent subtidal sandy and reef habitats during the construction phase.<br>***Low Negative*** | • Limit the duration of construction activities in the coastal zone.<br>• Constrain the spatial extent of impacts to the minimum required. | Marine Impact Assessment |
| **Impacts on the West Coast rock lobster in the artificial habitats**<br>The proposed development will involve the removal and alteration of existing dolosse to accommodate new infrastructure. This activity is expected to result in the displacement, injury, or mortality of numerous West Coast Rock Lobsters that currently inhabit the dolosse. The impact will be intense, highly localised, and concentrated over the short-term construction period.<br><br>The construction will significantly disturb rock lobster habitat in the immediate area; however, population-level impacts on rock lobster are unlikely, given the species' broader distribution and mobility. | X | | No impacts are anticipated.<br>***No Impact*** | The construction will significantly disturb rock lobster habitat in the immediate area; population-level impacts on rock lobster are unlikely, given the species' broader distribution and mobility. The total area of disturbance is **0.032 km²**.<br>***Low Negative*** | • Constrain the spatial extent of impacts to the minimum required.<br>• Implement phased removal and potential translocation of individuals from high-density zones. | Marine Impact Assessment |
| **Disturbance of pelagic open water habitat**<br>The proposed development will result in the disturbance of benthic sediments, leading to their resuspension into the water column, which may result in elevated turbidity and associated impacts. Increased turbidity can reduce water clarity and light penetration and can disrupt the feeding and reproductive behaviours of various species that rely on clear water for survival. | X | | No impacts are anticipated.<br>***No Impact*** | The construction phase will negatively impact the pelagic open water habitat within the development footprint.<br><br>The proposed development construction will result in the temporary disturbance of pelagic habitat within the footprint of the Granger Bay development.<br>***Low Negative*** | • Limit the duration of construction activities in the coastal zone.<br>• Constrain the spatial extent of impacts to the minimum required. | Marine Impact Assessment |
| **Noise and vibration impact on fish, invertebrates and birds**<br>It is anticipated that the construction approach will be land-based using excavators (or similar), with vessels likely used at some level for observation and survey work. Noise may therefore be generated by construction activities such as earth-moving vehicles, service vehicles, vessels, cranes, heavy machinery, generators, excavating, installation of piles, drilling, grinding, etc.<br><br>Specific to this development, the excavation of existing rock and soil (especially when undertaken within the intertidal or subtidal zone using heavy machinery) can introduce moderate levels of underwater noise. Mechanical excavation and rock-breaking equipment produce low- to mid-frequency vibrations that can transmit through the substrate and water column. Moreover, the dumping of rock into the sea, particularly when involving large rocks or dolosse, can produce short bursts of intense, low-frequency underwater sound as the material impacts the seabed, and the subsequent shaping of dumped rock using excavators adds a layer of continuous mechanical noise (although generally of lower intensity) which can impact marine organisms. Together, these activities could lead to the temporary displacement of marine species and changes to local habitat use. | X | | No impacts are anticipated.<br>***No Impact*** | During construction operations, above-water and below-water noise may have an impact on marine organisms in the vicinity proposed development area.<br><br>Low- to mid-frequency vibrations may cause temporary avoidance behaviour in fish and marine mammals in and around the development area.<br><br>Given the duration of the impact (up to two years of total construction time, but intermittent noise sources), and the anticipated area of impact (localised, within 1 km of the site) the impact of noise disturbance on invertebrates, fish and avifauna is assessed to be of very low significance before mitigation.<br>***Low Negative*** | • Subject mobile equipment, vehicles and power generation equipment to noise tests at commencement and periodically throughout the construction phase. | Marine Impact Assessment |

| Issue | Phase | | Alternative 1 No-Go Alternative | Alternative 2: Proposed development footprint | Potential mitigation measures or enhancements | Further assessment |
|---|---|---|---|---|---|---|
| | C | O | Impact description and preliminary significance rating (without mitigation) | | | |
| **Impacts on marine mammals with increased vessel presence**<br>Construction phase impacts of the proposed development on marine mammals include an increase in vessel presence in the area, the effects of construction noise, and an increase in turbidity and pollution.<br><br>The Granger Bay area is already subject to a significant level of boat traffic in the area (both recreational and commercial vessels), as it lies between three harbours/slipways (the Ocean Power Boat Club, the Port of Cape Town, and the Granger Bay Waterclub). | X | | No impacts are anticipated.<br><br>***No Impact*** | Impacts are anticipated to be significant should large vessels be used for construction purposes or a barge be installed (such as for a crane).<br><br>***Low Negative*** | • Vessels used must be driven in a slow and responsible manner, keeping gear changes and acceleration to a minimum to minimise rapid changes in noise levels.<br>• A lookout must be kept for dolphins and whales, and groups should be avoided where possible.<br>• If any impacts are observed (vessel strike, entanglement, strong avoidance responses), these should be reported to the relevant environmental authority as soon as possible (e.g. DFFE). | Marine Impact Assessment |
| **Impacts on marine mammals with increased underwater noise**<br>Cetaceans are highly acoustically orientated and reliant on sound channels for feeding, social communication and orientation within their environment, and are thus particularly vulnerable to the impacts of human-generated sounds. In the long term, exposure to low-frequency noise may be a chronic cause of stress.<br><br>Impacts of the proposed development on the resident population of Heaviside's dolphins, which use the area on a daily basis for resting and socialising, have been flagged as of particular concern. | X | | No impacts are anticipated.<br><br>***No Impact*** | The impacts of noise disturbance on cetaceans during the construction phase include changes in vocalisation, respiration rate, swim speed, migration routes, diving and foraging behaviour, physical and auditory damage (either temporary or permanent) and in extreme cases, death and/or strandings.<br><br>It is anticipated that underwater noise will represent the impact of the largest spatial scale (hundreds of meters out to sea from the site during the construction).<br><br>***Low Negative*** | • Before engaging in any rock dumping or similar actions where material is dumped directly into the ocean, ensure that no baleen whales are within ~500 m of the impact site (in the absence of direct measures of sound levels and hearing thresholds, 500 m is widely used as a typical distance for safe avoidance of noise impacts). As far as possible, ensure no dolphins are within 500 m of the impact site. A dedicated marine mammal observer should be used for these phases of work.<br>• Ensure all machinery is in good working order to reduce in-air noise levels and transmission into the marine environment.<br>• Where rock placement/dumping/ construction is planned, aim to work from the ocean space backwards towards shore to create a physical barrier to sound in the initial stages of work, then all other fill work will be effectively 'on land'. | Marine Impact Assessment |
| **Change in habitats and system function**<br>The proposed development will impact habitats and change system functioning. The ecological effects of this habitat loss will persist and may become more pronounced over time. Sandy benthic areas support diverse communities of infaunal and epifaunal organisms, many of which form the basis of local food webs by providing foraging opportunities for demersal fish and mobile invertebrates. With the sandy substrate replaced by revetment material, these species will no longer find suitable habitat in the immediate area.<br><br>Additionally, changes to local hydrodynamics and sediment movement associated with the revetment may affect the quality and extent of surrounding sandy benthic areas, potentially leading to further habitat degradation nearby. In the adjacent open water environment, ongoing vessel activity and altered wave and current patterns may affect water quality and disrupt ecological processes such as planktonic productivity, larval dispersal, and the movement of pelagic species.<br><br>Moreover, the revetment structure will modify local wave dynamics once established, by altering how wave energy is reflected and dissipated along the shoreline. Instead of being absorbed or gradually broken by natural beach or rocky substrates, wave energy will be reflected off the hard revetment surface, potentially intensifying erosion at the base of the structure and in adjacent areas not protected by hard infrastructure. This change in wave action can influence nearshore sediment transport processes, which may result in | | X | No impacts are anticipated.<br><br>***No Impact*** | The loss of sandy benthic habitat during construction will remain in place during the operational phase of the proposed development. Moreover, the proposed development will impact hydrodynamics, change sediment movement in the area and modify the wave dynamics.<br><br>***Low Negative*** | • The project design must account for potential changes in hydrodynamic function and ensure that resultant local changes in hydrodynamics do not cause significant, ongoing scour of the seabed.<br>• Ensure potential pollution sources (including bilge water and greywater etc.) associated with the development are managed to avoid pollution which may further degrade these habitats. | Marine Impact Assessment |

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| increased scouring in some areas and sediment accumulation in others. | | | | | | |
| **Loss of rocky shore habitat and introduction of artificial habitat**<br>In cases where natural rocky shore habitat has been removed or modified to accommodate the revetment, the operational phase will reflect a shift in habitat type from natural intertidal rock platforms to artificial, engineered hard surfaces.<br><br>The revetment will, however, be colonised over time by marine organisms, as evidenced by the current rocky subtidal communities present on the dolosse of the Port. Artificial habitats, however, may be susceptible to colonisation by non-native or invasive species, which can further alter the ecological balance and outcompete native biota. | | X | No impacts are anticipated. | There will be a loss of natural rocky shore habitat and the introduction of additional artificial habitat during the operational phase. The total area of 'natural' rocky intertidal habitat lost is extremely small.<br><br>The shift from natural to artificial habitat may also impact species that rely on intertidal zones for specific life history functions, such as spawning, feeding, or sheltering during tidal fluctuations. | • No mitigation measures are identified. | Marine Impact Assessment |
| | | | ***No Impact*** | ***Low Negative*** | | |
| **Impacts on the West Coast rock lobster**<br>The proposed development includes the installation of new dolosse. The new dolosse will provide an increase in area for West Coast rock lobster habitat and recolonisation. | | X | No impacts are anticipated. | It is anticipated that the proposed development will positively impact the West Coast rock lobster by providing additional habitat in the form of dolosse. | • No enhancements are identified. | Marine Impact Assessment |
| | | | ***No Impact*** | ***Low Positive*** | | |
| **Increased vessel traffic**<br>The proposed development will cause increased commercial, recreational, fishing and tourism vessels using the new facilities.<br><br>Increased vessel activity poses a range of ecological risks, many of which are cumulative in nature. For example, underwater noise from engines and propellers can disrupt the behaviour, communication, and navigation of marine species; routine discharges associated with vessel operations, such as bilge water, greywater, and deck runoff, can introduce pollutants, degrade water quality, and impact sensitive marine organisms; and ballast water and biofouling on hulls present a persistent threat of introducing invasive marine species, which can become established and outcompete native flora and fauna. | | X | No impacts are anticipated. | It is anticipated that increased vessel traffic in and around the proposed development area will have an impact on marine organisms. | • Designate speed-restricted areas within Granger Bay to reduce underwater noise and minimise the risk of vessel strikes on marine fauna.<br>• Follow local legislation and international best-practice guidelines for bilge and greywater discharge, with clear signage and training for all harbour users.<br>• Awareness and reporting: Conduct regular environmental awareness campaigns for vessel operators and implement a system for reporting marine mammal sightings and pollution events. | Marine Impact Assessment |
| | | | ***No Impact*** | ***Medium Negative*** | | |
| **Short wave reflections into Table Bay and Granger Bay development**<br>The proposed development will cause short-period, wind-generated waves into Table Bay that will reflect off the 'East' and 'West' breakwaters, which can alter wave conditions for up to 500 m from the breakwaters. The changes in wave heights are considered to be small and should be around 15 cm. The reflected waves will not travel more than 500 m into Table Bay and will not reach the Blouberg beach or Milnerton beach.<br><br>The short-period, wind-generated waves that reflect towards the new bay (mostly from the 'West' breakwater) will arrive perpendicular to the direction in which boats enter or exit the new bay. Boats may experience short waves with low wave heights that may influence navigation. | | X | No impacts are anticipated. | It is anticipated that the proposed development will alter short-wave reflections into Table Bay and into the Granger Bay development, thus impacting navigation in the Granger Bay development. | • No mitigation measures are identified. | Oceanographic Impact Assessment |
| | | | ***No Impact*** | ***Low Negative*** | | |
| **Long wave reflections into Granger Bay development**<br>The long-period waves that reflect towards the new bay (mostly from the 'West' breakwater) will enter the development and may cause seiches or water level surges in the new bay. It is possible that the 'West' breakwater and the Granger Bay Marina breakwater will form a wave guide for long waves and possibly resonance in the development. | | X | No impacts are anticipated. | It is anticipated that long wave reflections will impact on berthing and mooring in the Granger Bay development. | • Mitigation measures will be to construct mechanisms to absorb wave energy as is presently in the development. | Oceanographic Impact Assessment |
| | | | ***No Impact*** | ***Low Negative*** | | |

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| **Short and long wave reflections on the Granger Bay development breakwater.**<br>The waves that reflect onto the new bay (mostly from the 'West' breakwater) can lead to increased wave heights at the breakwater.<br><br>During storm conditions, the increased wave heights may exceed the design criteria of the breakwater or cause increased damage to the breakwater. | | X | No impacts are anticipated.<br><br>***No Impact*** | It is anticipated that short- and long-wave reflections on Granger Bay development breakwaters may impact wave heights and potentially cause damage to the breakwaters.<br><br>***Low Negative*** | • Mitigation can include regular monitoring of the condition of the breakwater with rehabilitation when necessary. | Oceanographic Impact Assessment |
| **Impacts of the Granger Bay development breakwater on the Oceana Power Boat Club**<br>Total wave heights will be reduced at the Oceana Powerboat Club and lead to more favourable launch conditions. However, users navigating to the exit of the development zone will encounter a circulating eddy current as well as a tidal current, with an increase in tidal current magnitude in the opening to the new bay, which may give stronger currents than expected. Users may also experience higher than normal wave heights near the centre of the new bay due to resonance. | | X | No impacts are anticipated.<br><br>***No Impact*** | Oceana Powerboat Club users may be impacted by a change in tidal currents and increased wave heights due to the proposed development.<br><br>***Low Negative*** | • There are limited physical mitigation options available, but users should be made aware of the possible effects that they may encounter. | Oceanographic Impact Assessment |
| **Impacts of the Granger Bay development breakwater on Longshore sediment transport**<br>The coastline around the development area is rocky with very limited sediment, and no changes in the sediment transport regime are anticipated due to the proposed revetment and breakwaters. | | X | No impacts are anticipated.<br><br>***No Impact*** | No significant impacts on sediment transport are anticipated.<br><br>***No Impact*** | • Mitigation measures are not required. | None |
| **Construction-phase sedimentation impacts on surrounding area**<br>The addition and resuspension of sediments during reclamation activities may result in impacts on the surrounding area including excess sedimentation and impacts on water clarity. | X | | No impacts are anticipated.<br><br>***No Impact*** | If no mitigation measures are implemented, impacts could extend into Granger Bay and the adjacent marina.<br><br>***Low Negative*** | • Only clean rock without fines to be used in infilling.<br>• Outer part of reclamation to be placed first, isolating the remainder of the site from the ocean.<br>• Geotextile and silt curtains to be used to isolate the works area. | General EIA |
| **Increased economic production and GDP**<br>Temporary impacts will occur during construction, and sustainable impacts will occur during the operational phase of the development.<br><br>The construction phase will have direct, indirect and induced impacts on production and the gross domestic product (GDP). Direct impacts involve changes occurring in 'front-end' businesses that initially incur expenditures and generate revenue directly from operational activities during the construction phase. These include expenditures on labour, materials, supplies, and capital. Indirect impacts involve the procurement of goods and services, as well as the hiring of labour by suppliers to meet increased demand. Induced impacts arise from household spending of labour income, net of taxes, savings, and commuting expenses, which result from the expenditure by employees within the business' supply chain.<br><br>Sustainable effects on economic activity will be through production and GDP. These two effects stimulate the economy and increase regional gross domestic product. | X | X | No impacts are anticipated.<br><br>***No Impact*** | It is anticipated that the proposed development will generate temporary business and increase production and GDP through construction activities.<br><br>It is anticipated that the operational phase of the proposed development will impact total production by approximately **R2 320 billion** and contribute around **R1 188 billion** to GDP annually.<br><br>***Beneficial*** | • The developer should encourage the contractor to increase the local procurement practices and promote the employment of people from local communities, as far as feasible, to maximise the benefits to the local economies; and<br>• The developer should engage with local authorities and business organisations to investigate the possibility of procuring construction materials, goods and products from local suppliers where feasible.<br>• Local procurement practices in terms of sourcing materials locally, hiring local suppliers and services and promoting the employment of people from local communities, as far as feasible to maximise the benefits to the local economies must be emphasized. | Socio-economic Impact Assessment |
| **Increased employment**<br>The proposed development will support temporary employment during the construction phase in various sectors, including building and construction, business and retail services and land-related activities.<br><br>The operational nature and scale of the proposed development will positively impact the socio-economic environment through | X | X | No impacts are anticipated. | It is anticipated that the construction phase will create approximately **26 929 temporary jobs** through direct, indirect, and induced mechanisms.<br><br>An estimated total of **5105 permanent jobs** will be created through direct, indirect, and induced mechanisms as a result of the | • Where feasible, efforts should be made to employ locally to create maximum benefits to the communities. | Socio-economic Impact Assessment |

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| the creation of sustainable employment opportunities throughout the operational phase. The diversity in skill levels ensures that the operational phase will support a balanced employment structure, contributing positively to both local employment and skills development. While most roles are expected to be permanent, the specific mix of skills will support long-term economic stability in the area. | | | | proposed development. With mainly semi-skilled and low-skilled roles during the construction and operational phases of the development. | | |
| | | | ***No Impact*** | ***Beneficial*** | | |
| **Increased household income**<br>The proposed development will increase household income during the construction phase due to locally hired unskilled and semi-skilled workers. Although temporary, this increase in household earnings will have a positive effect on nutrition, living conditions, access to better health care, access to more options regarding education, and improved ability to make economic choices.<br><br>The operational phase will also positively impact household income, although to a lesser extent, due to significantly less job availability during the operational phase compared to the construction phase of the proposed development. During this phase, employment opportunities will predominantly involve customer service, retail and property management, maintenance roles, and security personnel. | **X** | **X** | No impacts are anticipated. | It is anticipated that the increase in total income to be approximately **R3.949 billion** because of the capital expenditure of the construction phase.<br><br>Whereas the operational phase will contribute approximately **R488.4 million** in income. | • Where possible, local labour should be considered for employment to increase the positive impact on the local and regional economies.<br>• Employ labour-intensive methods in construction where feasible.<br>• Sub-contract to local construction companies first, where possible to do so.<br>• SMMEs should be approached to investigate the opportunities for supply inputs required for the maintenance and operations of the Data centres, warehousing and logistics operations. | Socio-economic Impact Assessment |
| | | | ***No Impact*** | ***Beneficial*** | | |
| **Increase in government revenue**<br>The proposed development during its construction phase is expected to increase government revenue through direct taxes from construction permits and fees, corporate taxes paid by contractors and suppliers, and indirect taxes generated by the purchase of materials and goods. Additionally, revenue is anticipated from licensing fees for the and other operational permits.<br><br>During the operational phase, the development is expected to contribute to ongoing government revenue through property taxes, licensing fees, and other operational permits | **X** | **X** | No impacts are anticipated. | It is anticipated that the proposed development will increase government revenue temporarily during construction and permanently during the operational phase of development. | • No enhancements are identified. | Socio-economic Impact Assessment |
| | | | ***No Impact*** | ***Beneficial*** | | |
| **Increased traffic congestion**<br>During the construction phase of the proposed development, temporary disruptions to traffic flow are anticipated along key access routes, including Granger Bay Boulevard, Beach Road, and the M61 (Helen Suzman Boulevard). Construction activities, such as the movement of heavy vehicles and potential partial road closures, may lead to increased congestion and traffic volumes, particularly during peak hours. | **X** | | No impacts are anticipated. | It is anticipated that there will be increased traffic congestion in the Granger Bay precinct and in the surrounding area due to disruptions in traffic flow during construction. | • Off-peak scheduling of heavy-vehicle movements.<br>• Advance public notice of road, lane or shoulder closures, with on-site flagmen, barriers and signage compliant with Southern African Road Traffic Signs Manual (SARTSM).<br>• Site traffic-management plan with qualified marshals<br>• Early liaison with MyCiTi operations to phase any temporary stop or route restrictions and obtain route deviations.<br>• Stakeholder notifications and information boards within the Waterfront precinct. | Transport Impact Assessment |
| | | | ***No Impact*** | ***Medium Negative*** | | |
| **Pavement wear and dust**<br>During the construction phase of the proposed development, temporary pavement wear and dust generation is anticipated along the key access routes as a result of construction vehicle movement. | **X** | | No impacts are anticipated. | It is anticipated that there will be potential pavement wear and dust generated during construction along haul routes. | • Wheel-wash bays and routine road-sweeping to prevent debris spillage.<br>• Condition checks of Granger Bay Boulevard and adjacent intersections along well-used haul routes.<br>• Dust suppression measures | Transport Impact Assessment |
| | | | ***No Impact*** | ***Low negative*** | | |
| **Safety of workers and the public**<br>During the construction phase of the proposed development, there could be potential impacts on the safety of the public and workers. | **X** | | No impacts are anticipated. | It is anticipated that there could be a safety risk to construction workers and the public in the vicinity of the construction site. | • Traffic marshals and flagmen to direct traffic and people safely<br>• Segregated walkways<br>• Enforcement of a detailed Traffic Management Plan | Transport Impact Assessment |

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| | | | ***No Impact*** | ***Medium Negative*** | | |
| **Temporary road closures and diversions**<br>During the construction phase of the proposed development, there could be temporary road closures and diversions. | X | | No impacts are anticipated. | It is anticipated that there could be temporary road closures and diversions of traffic during the construction phase. | • Detours should be clearly indicated with the appropriate signage<br>• The public should be given advanced notice of any closures and detours<br>• Coordination with MiCiTi regarding and potential closures and detours<br>• Potential night work where feasible to avoid impact | Transport Impact Assessment |
| | | | ***No Impact*** | ***Low negative*** | | |
| **Increase in traffic volumes**<br>The operational phase of the proposed development is anticipated to result in increased traffic volumes in the surrounding areas, particularly along key access routes such as Granger Bay Boulevard, Beach Road, and the M61 (Helen Suzman Boulevard). This is primarily due to the scale of the development and its mixed-use nature, incorporating residential, commercial, and recreational components that will attract both daily users and visitors. | | X | No impacts are anticipated. | It is anticipated that there will be an increase in traffic volumes during the operational phase of the development. | • Encourage public transport use.<br>• Investment in Traffic Demand Management to offset growth in traffic volumes, Granger Boulevard dual carriageway | Transport Impact Assessment |
| | | | ***No Impact*** | ***Low Negative*** | | |
| **Intersection performance and capacity**<br>There may be an impact on intersection performance and capacity as a result of increased traffic volumes during the operational phase of the proposed development. | | X | No impacts are anticipated. | It is anticipated that there could be a negative impact on intersection performance and capacity. | • Investment in Traffic Demand Management to offset growth in traffic volumes<br>• Signalisation if required | Transport Impact Assessment |
| | | | ***No Impact*** | ***Low Negative*** | | |
| **Access safety and local circulation**<br>The operational phase of the proposed development is anticipated to impact local circulation and access safety. | | X | No impacts are anticipated. | It is anticipated that there could be a negative impact on local circulation and access safety. | • Minimum stacking (lanes/setback)<br>• No stacking-related concerns are anticipated on the external road network, provided that internal access control points are set back sufficiently (or additional ingress lanes provided) and designed in accordance with the Committee of Transport Officials (COTO) TMH 16 Volume 2: South African Traffic Impact and Site Traffic Assessment Standards and Requirements Manual (Version 1.01, February 2014).<br>• Queueing requirements should be addressed at the design stage for each individual site.<br>• Crossings should be aligned with established desire lines, and at high-volume locations, signalised or grade-separated crossings may be required. | Transport Impact Assessment |
| | | | ***No Impact*** | ***Low Negative*** | | |
| **Skills development in the region**<br>Ongoing opportunities for local skills development through employment across various sectors (e.g., retail, hospitality and facilities management).<br><br>Skills development may include on-the-job training in customer service, sales, stock control, and digital point-of-sale systems; front-desk and guest service skills in hospitality and short-term accommodation; basic facilities and property management skills for operational staff; and workplace exposure for students or interns. | | X | No impacts are anticipated. | It is anticipated that there will be opportunities for skills development during the operational phase. | • Where feasible, efforts must be made to employ the skilled individuals in the local areas first. | |
| | | | ***No Impact*** | ***Beneficial*** | | |
| **Impact on visual sense of place during construction**<br>The proposed development construction phase will cause temporary visual disruptions. Activities such as the presence of cranes, scaffolding, and construction materials may alter the area's visual character, affecting the scenic quality | X | | No impacts are anticipated. | It is anticipated that there will be an impact on the visual sense of place of the Granger Bay precinct during construction. | • Place visual screens up around the construction site. | Visual and Socio-economic Impact Assessment |
| | | | ***No Impact*** | ***Medium Negative*** | | |

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| experienced by residents, visitors and users of adjacent public spaces. | | | | | | |
| **Impact on visual sense of place during operation**<br>The proposed development will align with the surrounding visual features of V&A Waterfront and improve current coastal features (e.g., the gravel beach), thus improving the visual sense of place of the Granger Bay precinct. | | X | No impacts are anticipated.<br>***No Impact*** | It is anticipated that the Granger Bay precinct's sense of place will be positively impacted by the development during the operational phase.<br>***Beneficial*** | • There are no enhancements. | Visual and Socio-economic Impact Assessment |
| **Public space and amenity value**<br>The proposed development includes the creation of a continuous coastal promenade extending over approximately 750 metres of Granger Bay's shoreline. This public realm intervention aims to improve non-motorised coastal access, support recreational activity, and enhance the overall liveability of the precinct.<br><br>The promenade links with the existing Sea Point Promenade and V&A Waterfront public spaces, which creates a regional recreational corridor and ensures improved access to the coast for local communities, promoting inclusive use of the coastal space. | | X | No impacts are anticipated.<br>***No Impact*** | It is anticipated that the overall public space and amenity value will improve significantly due to the proposed development.<br>***Beneficial*** | • Ensure inclusive access, lighting, safety design, and programming to maximise public benefit | Socio-economic Impact Assessment |
| **Tourism and visitor economy**<br>The proposed development will increase the number of tourist attractions in the area. These additions are likely to extend visitor dwell time and repeat visitation, stimulate local hospitality and retail spending, and increase the area's attractiveness to international and domestic tourists. Indirect benefits may also accrue to Cape Town's brand image as a modern, vibrant, and accessible city, further boosting tourism-linked sectors. | | X | No impacts are anticipated.<br>***No Impact*** | It is anticipated that there will be increased tourism potential and visitor spending in the Granger Bay precinct and surrounding areas.<br>***Beneficial*** | • Integration with V&A Waterfront tourism campaigns, event activation, and heritage trails | Socio-economic Impact Assessment |
| **Recreational boat use in Granger Bay during construction**<br>The proposed development may impact recreational boat use during the construction phase due to construction activities including marine piling, breakwater realignment, and land reclamation. | X | | No impacts are anticipated.<br>***No Impact*** | It is anticipated that recreational boating will be impacted by the construction phase of the proposed development.<br>***Medium Negative*** | • Communication and staged construction.<br>• Schedule construction outside peak boating seasons.<br>• Maintain temporary access routes and berthing.<br>• Communicate the construction schedule in advance. | Socio-economic Impact Assessment |
| **Recreational boat use in Granger Bay**<br>The proposed breakwaters and realignment of the revetment are expected to create a more sheltered water body, which could improve long-term boating safety and usability, especially for non-motorised vessels.<br><br>The proposed public infrastructure, including new walkways and a connection to the Mouille Point promenade, will likely enhance access and attract more visitors engaging in recreational marine activities. This is expected to draw higher foot traffic from locals and tourists alike, increasing demand for activities such as kayaking, paddleboarding, and coastal walking.<br><br>The improved shelter conditions created by the breakwaters will also make Granger Bay more suitable for everyday users and operators running guided tours, expanding the market for marine recreation. These improvements are anticipated to contribute positively to the growth of the local marine recreation economy by supporting small businesses, rentals, and | | X | No impacts are anticipated.<br>***No Impact*** | It is anticipated that recreational boating use will increase during the operational phase due to positive enhancements of the development.<br>***Beneficial*** | • Promote inclusive access to berthing and marine infrastructure. | Socio-economic Impact Assessment |

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| tour services, while also increasing public engagement with the V&A Waterfront area as a recreational and social destination. | | | | | | |
| **Impact on ecotourism and marine wildlife-associated activities**<br>The proposed development construction is likely to impact kayaking and SUP tour operators in the area, as marine wildlife is a central component of their marketing and customer appeal. This is because construction activities, particularly pile driving, increased vessel activity, and noise pose a risk of temporary displacement of these species.<br><br>Should dolphins or whales avoid the area during the construction phase, operators may face reduced bookings, impacting livelihoods and business continuity. The risk is temporary but must be carefully mitigated to minimise local economic consequences. | X | | No impacts are anticipated.<br><br>***No Impact*** | It is anticipated that construction activities will negatively impact ecotourism and marine wildlife-associated activities.<br><br>***Medium Negative*** | • No mitigation measures proposed. | Socio-economic Impact Assessment |
| **Impact on ecotourism and marine wildlife-associated activities**<br>The proposed development operational phase will support marine wildlife-associated activities such as kayaking, SUP, informal marine mammal viewing, and eco-tourism walks.<br><br>The addition of the breakwaters is anticipated to create a more sheltered bay area, which will reduce wave energy and contribute to safer and more predictable conditions for non-motorised water-based recreation. These calmer waters may support more frequent wildlife sightings, particularly of Heaviside's dolphins and Cape fur seals, both of which are known to use the area. | | X | No impacts are anticipated.<br><br>***No Impact*** | It is anticipated that wildlife-based marine tourism, particularly kayaking/SUP operators reliant on wildlife sightings, will be positively impacted by the proposed development.<br><br>***Beneficial*** | • Potential impacts on marine fauna during operations can be managed through ongoing monitoring of species presence, particularly dolphins and seals, and the promotion of low-impact, non-motorised activities in the sheltered bay. Additional measures include public education signage, responsible wildlife viewing guidelines, and coordination with local operators to minimise disturbance. | Socio-economic Impact Assessment |
| **Disruption from land reclamation**<br>The proposed development construction land reclamation at Granger Bay is expected to result in disruptions to parking availability in the immediate area.<br><br>These effects may inconvenience local residents, visitors, and businesses that rely on easy access to coastal amenities, parking areas, and event spaces near the development footprint. For example, the temporary occupation of land for construction staging, fencing, and material stockpiling may limit access to some parking bays or increase congestion near the Oranjezicht City Farm Market (was moved in early September 2025) and adjoining areas. | X | | No impacts are anticipated.<br><br>***No Impact***<br><br>***No Impact*** | It is anticipated that the construction phase of land reclamation for the proposed development will impact visitors, residents and businesses in the area.<br><br>***Medium Negative***<br><br>***Beneficial*** | • Proactive mitigation through clear signage, communication of construction timelines, and the provision of alternative access routes or parking arrangements can help minimise the overall impact.<br>• Maintain some access routes.<br>• Maintain temporary access routes where possible; engage affected operators early to identify and address disruption concerns. | Socio-economic Impact Assessment |
| **Impact on coastal access**<br>The proposed development includes significant improvements to coastal infrastructure, such as extended pedestrian walkways, new breakwaters with public access, and improved connectivity to the Mouille Point promenade. These enhancements are expected to improve long-term, formalised public access to the coastal zone and support broader social and recreational use of the area.<br><br>This development will facilitate inclusive access to the coast, particularly in terms of the design in supporting free pedestrian movement, universal access and public amenities. This supports both leisure use and economic activity, especially for informal traders, local vendors, and small-scale marine operators. | | X | No impacts are anticipated.<br><br>***No Impact*** | It is anticipated that the development will provide enhanced physical and visual access to the coastline, thus benefiting diverse user groups.<br><br>***Beneficial*** | • Ensure walkways and access points remain open, universally accessible, and well-maintained as public infrastructure | Socio-economic Impact Assessment |
| **Visual impact from viewpoints, landscape features and scenic resources** | X | | The site is currently underutilised and does not visually connect with the V&A Waterfront. The current site breaks up the | It is anticipated that the proposed development construction will negatively impact the views from surrounding viewpoints. | • Provide visual screening during construction. | Visual Impact Assessment |

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| Visibility from Beach Road, Fort Wynyard, Somerset Hospital, the Water Club, the Radisson Hotel breakwater, and parts of the V&A will be affected during the construction phase of the development. | | | coastal corridor of the V&A Waterfront and Sea Point Promenade. Deterioration of the site will visually impact surrounding viewpoints. | | | |
| | | | ***To be determined*** | ***To be determined*** | | |
| **Visual impact from viewpoints, landscape features and scenic resources**<br>The views from Beach Road, Fort Wynyard, Somerset Hospital, the Water Club, and the Radisson Hotel breakwater will be altered during the post-construction phase of the development. | | X | The site is not currently a significant visual resource, containing various unrelated, temporary, or in some cases unsightly uses. | The site is not currently a significant visual resource, containing various unrelated, temporary, or in some cases unsightly uses. The proposed development will significantly alter the sense of place and the aesthetics of the site, in both positive and potentially in negative ways. | • To be determined. | Visual Impact Assessment |
| | | | ***To be determined*** | ***To be determined*** | | |
| **Disturbance of archaeological resources**<br>The proposed development construction activities associated with the Granger Bay Land Reclamation project have the potential to impact pre-colonial archaeological sites and material, and any maritime archaeological resources within the project area.<br><br>The nature of the proposed work in this area, i.e., the depositing of fill on the seabed, also means that the direct interventions into the seabed that might encounter such material will not take place. Submerged prehistoric archaeological material is, therefore, insignificant. | | | No impacts are anticipated. | No significant impacts are anticipated. | • No mitigation measures are necessary. | Heritage Impact Assessment |
| | | | ***No Impact*** | ***Insignificant*** | | |
| **Disturbance of heritage resources** | X | | | | • To be determined. | Heritage Impact Assessment |
| | | | ***To be determined*** | ***To be determined*** | | |
| **Impact on cultural heritage** | X | | | | • To be determined. | Heritage Impact Assessment |
| | | | ***To be determined*** | ***To be determined*** | | |
| **Noise, dust and pollution generation**<br>The proposed development construction will cause noise and dust emissions due to the operation of heavy machinery, land clearance and other construction-related activities. These factors will affect residents, visitors and landowners in the surrounding area. | X | | No impacts are anticipated. | It is anticipated that construction phase activities will produce noise and dust impacts. | • Comply with legislation and by-laws regarding noise and dust regulation methods close to and on roads and other existing infrastructure.<br>• Regularly clean and maintain the construction site to prevent the accumulation of dust. | Socio-economic Impact Assessment and the EIA |
| | | | ***No Impact*** | ***Medium Negative*** | | |

| Issue | Phase | | Alternative 1 No-Go Alternative | Alternative 2: Proposed development footprint | Potential mitigation measures or enhancements | Further assessment |
|---|---|---|---|---|---|---|
| | C | O | Impact description and preliminary significance rating (without mitigation) | | | |
| **Waste generation and disposal**<br>During the construction phase of the proposed development, construction materials may enter the marine environment. The impact on certain forms of marine life by floating or submerged solid materials can be substantial.<br><br>Objects which are particularly detrimental to aquatic fauna include plastic bags and bottles, pieces of rope and small plastic particles. The impact on certain forms of marine life by floating or submerged solid materials can be substantial. Most at risk include seabirds, mammals and fish (this may include rare or endangered species). | X | | No impacts are anticipated.<br><br>***No Impact*** | During the construction phase of the development, there may be impacts due to waste generation and incorrect waste disposal into the marine environment.<br><br>***Medium Negative*** | • Inform and train all staff about sensitive marine species and the responsible disposal of construction waste. This training must be integrated into toolbox talks or onsite awareness sessions to ensure that waste management practices are understood and followed diligently. Additionally, contractors must prepare a method statement outlining specific waste management procedures, which must be approved by the resident engineer before construction activities commence.<br>• Suitable handling and disposal protocols must be clearly explained, and sign boarded.<br>• Reduce, reuse, recycle.<br>• Waste disposal at licensed landfill sites by qualified contractors is mandatory, with proof of disposal submitted to the appointed Environmental Officer. Waste management certification must be obtained, and detailed records of all stored and disposed waste, including quantity, nature, and fate, must be maintained for auditing purposes.<br>• Adequate sanitary facilities and ablutions must be provided for all personnel throughout the project area. Enforcement of facility usage and cleanliness is crucial. | Marine Impact Assessment and the EIA |
| **Effects of hazardous substance spills**<br>The proposed development construction may involve traffic on the breakwater by heavy vehicles and machinery, as well as potential manoeuvring of vessels. These activities will be localised and confined to within a few hundred metres of the construction footprint. The risk of spillage of a variety of hazardous substances may occur during the use of heavy machinery, construction vehicles and construction vessels. For example, spillage may occur as a result of fuel leaks, refuelling, or collision. Hydrocarbons are toxic to aquatic organisms, and precautions must be taken to prevent them from contaminating the environment. | X | | No impacts are anticipated.<br><br>***No Impact*** | During the construction phase, there may be impacts on the marine environment due to hazardous substance spills.<br><br>***Low Negative*** | • Intentional disposal of any substance into the environment is strictly prohibited, while accidental spillage must be prevented, contained and reported immediately.<br>• Implementation of a rigorous environmental management and control plan (including procedures for remediation).<br>• All fuel and oil are to be stored with adequate spill protection.<br>• No leaking vehicles are permitted on site.<br>• All hazardous substances must be accompanied by a permit, a hazard report sheet, and may only be handled by suitably trained operators. | Marine Impact Assessment and EIA |
| **Climate Change-related risks and impacts**<br>Due to the location of the development along the coast, it may be exposed to risks such as sea-level rise, storm surges, coastal erosion, and flooding as a result of climate change. | X | X | ***To be determined*** | ***To be determined*** | • Design and implementation of the proposed breakwaters and other coastal protection infrastructure in accordance with the hydrodynamic and wave modelling, and the recommendations of the coastal engineer. | Climate Change Impact Assessment |

# CHAPTER 7
# PUBLIC PARTICIPATION

**January 2026**

**Final Scoping Report**

Infinity Environmental

# 7 PUBLIC PARTICIPATION PROCESS

This chapter outlines the Public Participation Process undertaken as per Regulation 41 of the EIA Regulations 2014, as amended. Issues and concerns raised during the scoping process will be considered and evaluated in the EIA phase of this application. The ICMA and NEMA processes informed how the public participation process will be implemented from the pre-application Scoping phase to the EIA application for Environmental Authorisation.

## 7.1 Objectives of Public Participation

Public Participation is a critical informant of environmental assessment. Comprehensive, integrated and thorough application of public participation facilitates and ensures informed decision-making by the competent authority. Guidelines on public participation in terms of the NEMA EIA Regulations (Regulation 41), published by the then Department of Environmental Affairs (now called the Department of Forestry, Fisheries & the Environment) in 2017, note that public participation should allow for the following:

- to provide an opportunity for all role players, including potential and registered interested and affected parties, EAPs, state departments, organs of state, and the competent authority **to obtain clear, accurate and understandable information about the environmental impacts** of the proposed activity or implications of a decision;
- to provide the **opportunity for role-players to suggest** ways for reducing or mitigating any negative impacts of the project and for enhancing its positive impacts;
- to enable the person conducting public participation to **incorporate the needs, preferences and values** of potential and registered interested and affected parties into the proposed development that becomes the subject of an application for an environmental authorisation;
- to provide opportunities for **clearing up misunderstandings** about technical issues, resolving disputes and reconciling conflicting interests;
- to encourage **transparency and accountability** in decision-making;
- to contribute toward maintaining a healthy, vibrant **democracy**; and
- to give effect to the requirement for **procedural fairness** of administrative action as contained in the Promotion of Administrative Justice Act, 2000 (Act No. 3 of 2000).

## 7.2 Pre-application Public Participation

The following tasks were undertaken as part of the pre-application public participation from **31 July 2025 to 1 September 2025**:

- On Thursday 31 July 2025, four notice boards advising of the application were placed at the following points:
    - Corner Beach Road and Haul Road
    - Main entrance of the Grand Africa Café & Beach
    - Entrance of the parking area on Granger Bay Boulevard
    - Adjacent entrance 2 at the V&A Waterfront Mall
- The draft pre-application Scoping Report was available for download from the project website at www.infinityenv.co.za/grangerbay.
- A hard copy of the Scoping Report was also placed at the Sea Point public library.

- A media notice was published in the *Atlantic Sun* and the *Cape Times*, respectively a local and a regional newspaper, on Thursday 31 July 2025.
- Written notice was given to potential I&APs by email, including owners and occupiers of the site and land adjacent to the site, ward councillors, and others. Where neighbouring properties included sectional title schemes or multiple units, the managing agent or property owners' associations was engaged with and undertook to distribute notifications internally to owners and lessees.
- Organs of state which administer related legislation were provided with an opportunity to comment on the draft pre-application Scoping Report. Each organ of state was notified of the availability of the documents for comment via email.
- A public Open House was held on Wednesday 13 August 2025 between 15:00 and 19:00. Project information was on display, and the project team was available to discuss queries and concerns.

The Comments and Responses Report (**Appendix H1**) contains all comments received during the commenting period on the pre-application Scoping Report, and indicates how these have been or will be addressed throughout this process.

## 7.3 Public Participation: Scoping Phase

Public participation during the Scoping phase seeks to obtain input from potential key stakeholders identified, adjacent landowners and occupiers, government departments, and members of the public. The Scoping process culminates in a Scoping Report and Plan of Study for the assessment phase, and the pre-application consultation ensures that these comprehensively reflect the inputs and comments of interested and affected parties.

The availability of the Draft Scoping Report and information on the application for environmental authorisation and the opportunity to participate were publicised as follows:

- Registered interested and affected parties were notified directly via preferred contact methods.
- Organs of state, including the municipality as well as provincial and national departments, were notified of the availability of the report for comment.
- The Scoping Report was made available for download from the project website at www.infinityenv.co.za/grangerbay
- Comments and registration requests were accepted via a website form, by email and via WhatsApp.

A 30-day commenting period commenced on **Monday 10 November 2025,** and ended on **Wednesday 10 December 2025**. Registered interested and affected parties were notified as described in Section 7.2 above and encouraged to comment using any of the methods provided below.


Online at **www.infinityenv.co.za/grangerbay**


By email to **grangerbay@infinityenv.co.za**


By WhatsApp message to **060 524 7676**

For more information, to comment, or to arrange alternative ways of participating, Infinity Environmental can be contacted at the details above.

## 7.4 Processing of Personal Information

Infinity Environmental is required by the EIA Regulations, GNR 326 of 2017 and the National Environmental Management Act to maintain a register of interested and affected parties, including people who have commented, attended meetings, or requested registration. This requires us to collect and process certain personal information as defined in the Protection of Personal Information Act, 2013. The following personal information will be collected, with the required consent, for the purpose of public participation from registered I&APs and will be collected from anyone who comments or registers:

- Name, contact details and address.
- A copy of any comments submitted; and
- Details of any interest declared in the granting or refusal of the application.

The name and comments of each Interested and Affected Party who registered and/or who will comment shall be provided to the competent authority. Interested and Affected Parties were informed that, should they register and/or comment, their name and contact details are provided to the competent authority and the applicant. Personal information will be stored by Infinity Environmental (Pty) Ltd at 2 Fir Street, Observatory 7925, and on a cloud storage system which may include servers outside the Republic of South Africa. Interested and Affected Parties may, at any time, request access to or rectify this personal information by contacting us at info@infinityenv.co.za.

**Visit www.infinityenv.co.za/legal to view our Privacy Policy**

## 7.5 Regulatory Requirements for Public Participation

The Public Participation Process undertaken for the pre-application commenting period met the requirements of Regulation 41 of the EIA Regulations 2014, as amended, and is outlined in Box 7-1 below.

**Box 7-1: Regulation 41 of the EIA Regulations: Requirements for the Public Participation Process**

**Public Participation Process**

41. (1) This regulation only applies in instances where adherence to the provisions of this regulation is specifically required.

(2) The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of an application or proposed application which is subjected to public participation by—

(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of—

(i) the site where the activity to which the application or proposed application relates is or is to be undertaken; and

(ii) any alternative site.

(b) giving written notice, in any of the manners provided for in section 47D of the Act, to—

(i) the occupiers of the site and, if the proponent or applicant is not the owner or person in control of the site on which the activity is to be undertaken, the owner or person in control of the site where the activity is or is to be undertaken and to any alternative site where the activity is to be undertaken.

(ii) owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken and to any alternative site where the activity is to be undertaken.

(iii) the municipal councillor of the ward in which the site and alternative site is situated and any organisation of ratepayers that represent the community in the area.

(iv) the municipality which has jurisdiction in the area.

(v) any organ of state having jurisdiction in respect of any aspect of the activity; and

(vi) any other party as required by the competent authority.
(c) placing an advertisement in—
(i) one local newspaper; or
(ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations.
(d) placing an advertisement in at least one provincial newspaper or national newspaper, if the activity has or may have an impact that extends beyond the boundaries of the metropolitan or district municipality in which it is or will be undertaken: Provided that this paragraph need not be complied with if an advertisement has been placed in an official Gazette referred to in paragraph (c)(ii); and
(e) using reasonable alternative methods, as agreed to by the competent authority, in those instances where a person is desirous of but unable to participate in the process due to—
(i) illiteracy.
(ii) disability; or
(iii) any other disadvantage.

(3) A notice, notice board or advertisement referred to in subregulation (2) must—
(a) give details of the application or proposed application which is subjected to public participation; and
(b) state—
(i) whether basic assessment or S&EIR procedures are being applied to the application.
(ii) the nature and location of the activity to which the application relates.
(iii) where further information on the application or proposed application can be obtained; and
(iv) the manner in which and the person to whom representations in respect of the application or proposed application may be made.
(4) A notice board referred to in subregulation (2) must—
(a) be of a size of at least 60cm by 42cm; and
(b) display the required information in lettering and in a format as may be determined by the competent authority.

[…]
**Register of interested and affected parties.**
42. A proponent or applicant must ensure the opening and maintenance of a register of interested and affected parties and submit such a register to the competent authority, which register must contain the names, contact details, and addresses of—
(a) all persons who, as a consequence of the public participation process conducted in respect of that application, have submitted written comments, or attended meetings with the proponent, applicant or EAP.
(b) all persons who have requested the proponent or applicant, in writing, for their names to be placed on the register; and
(c) all organs of state which have jurisdiction in respect of the activity to which the application relates.

**Registered interested and affected parties.**
43. (1) A registered interested and affected party is entitled to comment, in writing, on all reports or plans submitted to such party during the public participation process contemplated in these Regulations and to bring to the attention of the proponent or applicant any issues which that party believes may be of significance to the consideration of the application, provided that the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application
(2) In order to give effect to section 24O of the Act, any State department that administers a law relating to a matter affecting the environment must be requested, subject to regulation 7(2), to comment within 30 days.
Comments of interested and affected parties to be recorded in reports and plans.
44. (1) The applicant must ensure that the comments of interested and affected parties are recorded in reports and plans and that such written comments, including responses to such comments and records of meetings are attached to the reports and plans that are submitted to the competent authority in terms of these Regulations.

(2) Where a person desires but is unable to access written comments as contemplated in sub regulation (1) due to—
(a) a lack of skills to read or write.
(b) disability; or
(c) any other disadvantage.
reasonable alternative methods of recording comments must be provided for.

## 7.6 Consultation with organs of state

As part of the public participation process, organs of state which administer related legislation were provided with an opportunity to comment on the Scoping Report. Each organ of state was notified of the availability of the documents for comment via email. Table 7-1 below lists the organs of state that were consulted.

**Table 7-1: Organs of state to be consulted**

| Organ of State | Department | Contact Person |
|---|---|---|
| **Western Cape Department of Environmental Affairs and Development Planning** | Directorate: Development Management | Zaahir Toefy |
| | Development Management | Eldon van Boom |
| | Development Management | Keagan-leigh Adriaanse |
| | Development Management | Kraigen Govindasamy |
| | Pollution and Chemicals Management | Gunther Frantz |
| | Waste Management | Lance McBain-Charles |
| | Coastal Management | Mercia Liddle |
| | Coastal Management | Iepteshaam Bekko |
| **Department of Forestry, Fisheries, and the Environment** | Directorate: IEA | Sabelo Malaza |
| | Oceans and Coasts | Tabisile Mhlana |
| | Biodiversity Conservation | P Makitla |
| | Biodiversity Conservation | S Lekota |
| **SANParks** | Table Mountain National Park | Megan Taplin |
| | Cape Cluster | Monique Sham |
| | Table Mountain National Park: Marine Protected Area | Ezekiel Kosa |
| **Cape Nature** | | Ismat Adams |
| **South African Heritage Resources Authority** | | Consulted via SAHRIS upload |
| **Heritage Western Cape** | Emily Vowles | Consulted via s38 NID process |
| **City of Cape Town** | Environmental Management Department: Environment & Heritage Management | Maurietta Stewart |

| Organ of State | Department | Contact Person |
|---|---|---|
| **Department of Water and Sanitation** | | Nelisa Ndobeni |
| **Transnet National Ports Authority** | Infrastructure Management | Erlene Oliver |
| **Robben Island Museum** | Chairperson | Sabelo Madlala |
| **Department of Defence** | Fort Wynyard | Z.D Swandle and Kevin Ashton |

## 7.7 Upcoming public participation

Tasks to be undertaken during the future EIA Phase are outlined below.

» **Submit Final Scoping to Environmental Authorities for consideration**

The Scoping Report will be submitted to the environmental competent authority, which will review and assess the contents of the report and within 43 days will either accept the report and advise the applicant to proceed with the EIA or will refuse environmental authorisation.

» **30-day comment period on Draft EIA Report**

All comments received during the Scoping Phase commenting periods will be included in the Draft EIA Report, which will be circulated to registered I&APs, Organs of State and State Departments for a further 30-day commenting period.

» **Review comments received from I&APs and finalise EIA Report**

Comments received from I&APs and organs of state during the public participation process will be summarised and responded to in a Comments and Response Report that will form part of the Final EIA Report.

» **Submit Final EIA to Environmental Authorities for a decision**

The Final EIA Report will be submitted to the environmental competent authority, which will review and assess the contents of the report and within 107 days will either grant or refuse environmental authorisation.

## 7.8 Summary of issues raised during public participation

The FSR is informed by comments and queries received during public participation on the draft Scoping Report (DSR), which was made available for two 30-day review and comment periods in 2025.

Written submissions received during the first comment period (31 July 2025 to 1 September 2025) are included in a Comments and Responses Report (**Appendix H1**) while submissions received during the public comment period from 10 November to 10 December 2025 are recorded and responded to in **Appendix H2**.

Comments received on the Scoping Report are summarised below, together with high-level responses indicating how the comment has been addressed or incorporated in this Scoping Report. Please refer to **Appendix H** for detailed responses.

Written submissions received during the first comment period (31 July 2025 to 1 September 2025) are summarised in Table 7-2 below. Written submissions received during the second comment period (10 November to 10 December 2025) are summarised in Table 7-3 below.

**Table 7-2. Issues raised by I&APs and Organs of State during the first comment period (July to September 2025)**

| Issue | Summary of Concerns Raised | Response Summary |
|---|---|---|
| **Environmental Impacts** | Concerns about marine biodiversity, pollution, sedimentation, kelp wrack, and impacts on marine mammals and seabirds. | This issues will be addressed in the Marine Impact Assessment, Oceanographic Study, and EIA Report. An Environmental Management Programme will provide for monitoring programmes and mitigation measures. |
| **Coastal Erosion and Hydrodynamics** | Potential erosion of Milnerton shoreline due to breakwaters and land reclamation; comparisons to Ben Schoeman Dock; adequacy of modelling. | Wave and hydrodynamic modelling (included as **Appendix G**) found that no impact is expected beyond 500m from the site and that longshore sediment transport would not be affected. |
| **Public Access and Equity** | Concerns about maintaining free public access to coastline, slipway, and facilities; equitable access for vulnerable groups. | Public slipway will be reconstructed in a new location. Coastal walkway and promenade will be publicly accessible. Operational arrangements to ensure accessibility are under consideration. |
| **Heritage and Visual Impacts** | Impacts on Water Club residents, heritage sites, and visual character of the area. | To be addressed in Heritage and Visual Impact Assessments and through ongoing engagement with affected residents. |
| **Traffic and Transport** | Overburdened road infrastructure, especially during events; need for traffic impact analysis. | A Transport Impact Assessment will be conducted. Event traffic managed via City protocols. Quarry material transport impacts will be included in the TIA. |
| **Sewage and Water Quality** | Concerns about sewage; need for on-site treatment and water quality monitoring. | The City of Cape Town has confirmed sufficient capacity at the Green Point outfall, but the Waterfront also plans for an onsite treatment plant in future (not part of this application). Water quality monitoring will align with national guidelines. |
| **Land Use, Zoning, and Ownership** | Questions about zoning of reclaimed land, integration into cadastral system, and public ownership of Coastal Public Property. | Reclaimed land will be surveyed and registered. Ownership of coastal public property remains with the State; leasehold agreements will be negotiated if required. Rezoning will follow City processes. |
| **Socio-Economic and SME Opportunities** | Requests for kiosk space, sailing centre, and SME inclusion; concerns about property value impacts. | Forwarded to applicant for consideration. Socio-Economic Impact Assessment addresses property value concerns. Mixed-use development will include SME opportunities. |

| Issue | Summary of Concerns Raised | Response Summary |
|---|---|---|
| **Planning Alignment and Policy Compliance** | Compatibility with MSDF, Table Bay District Plan, and City's spatial strategies. | Development aligns with spatial planning policies and is supported by relevant City departments. |
| **Stormwater and Infrastructure Capacity** | Need for litter traps, sediment control, and confirmation of service capacity. | Stormwater management and discharge monitoring will be included in EMPr. City has confirmed sufficient capacity for water, sewage, and electricity. |
| **Public Participation Process** | Requests for extended comment periods and transparency. | EAP confirmed willingness to extend comment period and noted future participation opportunities. |

**Table 7-3. Issues raised by I&APs and Organs of State during the second comment period (November to December 2025)**

| Issue | Summary of Concerns Raised | Response Summary |
|---|---|---|
| **Material Requirements** | Requests for details of quantity of fill, sources and haul routes. | Confirmation that approximately 350,000 tons of rock are expected to be required and would be sourced from commercial quarries supplemented where possible with excavated material stored on the site and from other nearby developments. |
| **Socio-Economic Motivation** | Supportive comments noting economic benefits of expanded V&A Waterfront. | Acknowledged and noted as outside EIA scope but relevant to need & desirability. |
| **Traffic & Transport** | Concerns about existing congestion and risk of worsening gridlock; need for upgrades. | Impacts will be assessed in the Transport Impact Assessment and mitigation proposed where relevant. |
| **Coastal Processes & Impacts on Milnerton / Woodbridge** | Repeated earlier concerns: erosion risk, modelling limitations, long-wave effects, comparison to Ben Schoeman Dock. | Modelling shows no material effects beyond 300-500 m from the site; Milnerton is ~6 km away, and no erosion impacts are predicted. |
| **Modelling Gaps: Long-Period Waves, Extreme Events, Temporal Coverage** | Claims that the modelling window was too short, that long-period waves were ignored and that extreme episodic events were not captured. | Specialist confirms both long and short waves were modelled and that extreme storm conditions were used; specialists satisfied with assumptions. |
| **Sediment Transport & Bathymetry (Waterclub)** | Missing marina bathymetry; concerns about re-silting, dredging costs, sediment influx during construction; possible reduced flushing; request for detailed sedimentation projections. | PRDW modelling included the 2022 bathymetry & historic dredging records. The Waterclub is already a mud accumulation zone, but the proposed development is not expected to result in additional mud accumulation or dredging volume, as shown in Appendix G. Construction-phase sediment impacts will be assessed in the EIA. |

| Issue | Summary of Concerns Raised | Response Summary |
|---|---|---|
| **Marine Biodiversity** | Concerns over habitat loss, noise, megafauna disruption, and possible harmful algal bloom formation. | To be addressed in Marine Ecology and Marine Mammal Assessments. Modelling shows flushing is adequate. Mitigation measures will be specified in the EMPr. |
| **Cape Kelp Forest Impacts** | Marine report insufficiently addresses kelp forest loss from reclamation. | The marine impact assessment will be revised if required to address kelp forest impacts. |
| **Water Quality** | Confirmation of sewage capacity required, and request for on-site treatment. | Confirmation of available capacity in the sewerage system will be obtained from the CCT and included in the Draft EIA Report. |
| **Water Quality: Bi-weekly monitoring + internal precinct monitoring** | City requests more frequent water quality testing and specification of interventions for pollution events. | Monitoring of water quality will be in line with national guidelines; EMPr to specify parameters and frequencies. Responses to pollution events will be the subject of an operational-phase protocol. |
| **Public Access & Equity** | Importance of slipway access; need equitable access for vulnerable groups. | Public slipway will be reconstructed in the new bay; the proposed promenade and walkways remain public access; operational arrangements will consider accessibility. |
| **Slipway Design, Surge Conditions, Parking Layout, Operational Management** | Requests for dimensions, details of modelled surge conditions, trailer parking location/size, operator arrangements. | The new slipway has better alignment to wave direction, with an estimated 5% downtime due to wave conditions. Further design details of the proposed slipway and associated facilities will be provided in the EIA Report. |
| **Heritage & Visual** | Requests from I&APs and City for clarity on building heights, view arcs, buffers. | To be addressed in VIA & HIA. |
| **Cadastral Boundaries, Development Rights on Reclaimed Land** | CCT requests confirmation that reclaimed land has no current rights and clarity on future rezoning/precinct planning. | The bulk rights for the reclaimed portion have not yet been established as the land is not yet established and has no zoning. For the reclaimed portion of land, a small portion of existing rights has been reserved for that land when and if it eventuates. The process will require subsequent land-use applications. |
| **Affordable Housing on Reclaimed Land** | CCT requests 10% inclusionary housing. | All newly reclaimed land will be the subject of a future land use management application process in which details of the proposed land use mix will be provided to the municipality. The land use mix will take into account the existing Waterfront property where there is provision for affordable housing. |
| **Stormwater & Infrastructure** | Need for litter traps, sediment control, infrastructure capacity. | EMPr will provide stormwater controls; City confirms water/sewage/electricity capacity are adequate. |

| Issue | Summary of Concerns Raised | Response Summary |
|---|---|---|
| **Waste Management** | City Solid Waste: no objection but sets formal conditions for refuse room, access, hazardous waste, etc. | Conditions noted for incorporation at design stage. |
| **Environmental Health** | Dust management and air-quality permitting for fuel-burning equipment. | To be included in EMPr. |
| **Climate Change** | Need for sea-level rise, surge, erosion, sediment transport, water-saving and energy-efficiency measures. | Climate Change Impact Assessment added to EIA scope; Scoping Report updated to reflect efficiency measures. |
| **Regulatory Requirements: ICMA Sections 7A, 7C** | Need robust justification for reclamation, alternatives comparison, CPP objectives, mitigation, additional permits. | Details of ICMA compliance have been added to Scoping Report sections 2 and 4. |
| **Public Participation** | I&APs request continued involvement; questions about notification adequacy. | All I&APs are invited to register and further notifications are planned for EIA stage. |

**The initial register of identified and registered Interested and Affected Parties will continue to be updated as the process proceeds. I&APs may register their interest at any time during the process.**

# CHAPTER 8

# PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT

**January 2026**

**Final Scoping Report**

Infinity Environmental

# 8 PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT

**This chapter presents the Plan of Study (PoS) for the Environmental Impact Assessment (EIA), which lays out the process to be followed in the EIA Phase (as required by the 2014 EIA Regulations). The PoS is based on the findings of the Scoping Phase to date and provides:**

- An overview of the Pre-Application, Scoping and Impact Assessment Phases;
- The schedule for the EIA Process;
- Terms of Reference (ToR) for the specialist studies that have been identified; and
- The assumption and limitations of the project.

## 8.1 Purpose of EIA

**The purpose of the EIA process is to:**

» Address issues that have been identified through the Scoping Process;
» Assess alternatives to the proposed activity comparatively;
» Assess all identified impacts and determine the significance of each impact; and
» Recommend actions to avoid/mitigate negative impacts and enhance benefits.

For reference, the differing objectives between the Scoping and EIA objectives are provided in Table 8-1 below. The Scoping phase is intended to **identify** impacts and risks, and to result in the selection of an approved site for the proposed activity, while the EIA phase is intended to **determine** the impacts and risks associated with the activity, and to assess alternatives identified in the Scoping phase, as well as alternatives recommended by the findings of environmental sensitivity studies.

**Table 8-1: Comparison of the objectives of the Scoping and EIA processes as per the EIA Regulations.**

| Objectives of the Scoping process (Appendix 2) | Objectives of the EIA process (Appendix 3) |
|---|---|
| Identify the policies and legislation relevant to the activity | Determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context |
| Motivate the need and desirability of the proposed activity, including within the context of the preferred location | Describe the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the development footprint on the approved site as contemplated in the accepted scoping report |
| Identify and confirm the preferred activity and technology alternatives through an identification of impacts and risks and a ranking process of such impacts and risks | Identify the location of the development footprint within the approved site as contemplated in the accepted scoping report based on an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects of the environment |
| Identify and confirm the preferred site through a detailed site selection process, which includes an identification of impacts and risks, including of | Identify the most ideal location for the activity within the development footprint of the approved site as contemplated in the accepted scoping report |

| Objectives of the Scoping process (Appendix 2) | Objectives of the EIA process (Appendix 3) |
|---|---|
| identification of cumulative impacts and a ranking process of all the identified alternatives, focusing on the geographical, physical, biological, social, economic, and cultural aspects of the environment | based on the lowest level of environmental sensitivity identified during the assessment |
| Identify the key issues to be addressed in the assessment phase | Determine the nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives; and degree to which these impacts—<br>• can be reversed;<br>• may cause irreplaceable loss of resources, and<br>• can be avoided, managed or mitigated; |
| Agree on the level of assessment to be undertaken, including the methodology to be applied, the expertise required as well as the extent of further consultation to be undertaken to determine the impacts and risks the activity will impose on the preferred site through the life of the activity, including the nature, significance, consequence, extent, duration and probability of the impacts to inform the location of the development footprint within the preferred site | Identify, assess, and rank the impacts the activity will impose on the development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity; |
| Identify suitable measures to avoid, manage, or mitigate identified impacts and to determine the extent of the residual risks that need to be managed and monitored | Identify residual risks that need to be managed and monitored |

**The EIA process consists of three parallel and overlapping processes:**

» A central assessment process through which inputs are integrated and presented in an EIA Report that is submitted for approval to the DEA&DP and commenting authorities;
» Continued public participation whereby findings of the EIA Phase are communicated to and discussed with interested and affected parties, and comments are documented; and
» Specialist studies to address the issues raised in the Scoping Phase.

Table 8-2 below shows where the requirements for a Plan of Study are addressed in accordance with Appendix 2 (1) (h) of the amended 2014 EIA Regulations.

**Table 8-2: Appendix 2 (1) (h) of the 2014 EIA regulations (as amended)**

| Content requirement | Report Section |
|---|---|
| **A plan of study for undertaking the environmental impact assessment process to be undertaken, including—** | |
| **(i) a description of the alternatives to be considered and assessed within the preferred site, including the option of not proceeding with the activity;** | 8.4 |
| **(ii) a description of the aspects to be assessed as part of the environmental impact assessment process;** | 8.5 (and Chapter 6) |
| **(iii) aspects to be assessed by specialists;** | 8.6 |
| **(iv) a description of the proposed method of assessing the environmental aspects, including aspects to be assessed by specialists;** | 8.7 and 8.9 |
| **(v) a description of the proposed method of assessing duration and significance;** | 8.7 |

| Content requirement | Report Section |
|---|---|
| **(vi) an indication of the stages at which the competent authority will be consulted;** | 8.3 |
| **(vii) particulars of the public participation process that will be conducted during the environmental impact assessment process; and** | 8.2 |
| **(viii) a description of the tasks that will be undertaken as part of the environmental impact assessment process;** | 8.2 and 8.11 |
| **(ix) identify suitable measures to avoid, reverse, mitigate or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored.** | 8.8 |

## 8.2 Public participation and other activities in the EIA Process

The Public Participation Process (PPP) for the Scoping Phase is described in Chapter 7 of this Scoping Report. The PPP will continue during the EIA Phase.

An overview of the tasks to be undertaken for the Assessment Phase of the EIA process is provided below.

### 8.2.1 Specialist Assessments; Draft EIA Report and Environmental Management Programme

Specialist studies and other assessments will be concluded or updated in line with the methods set out below.

A draft Environmental Impact Assessment Report and Environmental Management Programme will be prepared in line with legislated requirements.

### 8.2.2 Public Participation on draft EIA Report and EMPr

The draft EIA Report (including the EMPr) will be made available for a 30-day comment period, via the project website and in public libraries.

All registered I&APs on the project database will be notified in writing of the release of the EIA Report for review. The draft EIA Report and EMPr will be submitted to state departments for comment in terms of section 24O of NEMA.

To ensure that all potential I&APs have an opportunity to participate, site notice boards will again be placed on the boundaries of the proposed site, and media notices will be published in the *Atlantic Sun* and the *Cape Times*.

Additional potential I&APs identified during the Scoping Process or by the competent authority, envisaged to include marine user groups, will also be informed of the EIA process and invited to register their interest. Written notice will again be given to potential I&APs by email, including owners and occupiers of the site and land adjacent to the site, ward councillors, and others.

A second public open day or a series of focus group meetings with key I&APs and stakeholders will be facilitated. The purpose will be to provide an overview of the EIA and specialist studies, as well as to provide opportunities for input.

### 8.2.3 Review comments and finalise EIA / EMPr for decision

Comments raised, through written correspondence (emails, comments, forms) and at meetings (public open day and/or focus group meetings) will be captured in a Comments and Responses Report and submitted together with the EIA Report and EMPr to the competent authority for decision-

making. Comments raised will be responded to by the EAP and/or the applicant. These responses will indicate how the issue has been dealt with in the EIA Process. Should the comment received fall beyond the scope of this EIA, clear reasoning will be provided. All comments received (and the associated responses from the EIA team) will be included with the EIA Report on submission.

Comments received from I&APs and organs of state during the public participation process will be summarised and responded to in a Comments and Response Report that will form part of the Final EIA Report.

### 8.2.4 Decision on environmental authorisation

The competent authority must, **within 107 days of receipt** of the environmental impact assessment report and EMPr, in writing,—

a) grant environmental authorisation in respect of all or part of the activity applied for; or
b) refuse environmental authorisation.

## 8.3 Consultation with competent authority

The competent authority is the provincial DEA&DP. Consultation with the competent authority will be ongoing throughout the scoping and EIA and will include, at a minimum:

» A pre-application meeting (held on 6 March 2025);
» Request for comment on the pre-application Scoping Report (received on 3 September 2025, available in the pre-application C&R report, **Appendix H1**);
» Submission of application for environmental authorisation;
» Request for comment on the draft Scoping Report (received on 12 December 2025, available in the draft Scoping C&R report, **Appendix H2**);
» Submission of final Scoping Report for decision making;
» Request for comment on the draft EIA Report;
» Submission of final EIA Report for decision making; and
» A site inspection with the competent authority if deemed necessary.

## 8.4 Description of Alternatives to be assessed in the EIA

**Alternative 1: No-Go alternative**: The no-go alternative assumes that the proposed development will not go ahead. Although this alternative would not result in environmental impacts on the proposed site or local area, it would include the socio-economic opportunity costs and an unprotected coastline vulnerable to erosion. The no-go alternative provides a baseline against which the other alternative will be compared and considered during the EIA.

**Alternative 2: Proposed development footprint with land reclamation and coastal public space (Preferred Alternative)**: This alternative proposes to maximise development on the site and includes land reclamation to provide coastal protection, increase coastal public amenities and improve coastal access. This alternative is expected to have significant impacts on the environment, specifically on marine habitats and vulnerable marine species in and surrounding the site. Heritage resources surrounding the site may be affected by this alternative. However, this alternative will maximise socio-economic benefits by improving accessibility and providing spatial integration. Mitigation measures will also be included in the upcoming EMPr to ensure negative impacts are monitored and managed.

## 8.5 Impacts to be assessed

Chapter 6 describes in detail the impacts identified so far for assessment in the EIA, and preliminary considerations of these impacts. They include:

- Disturbance of intertidal and subtidal artificial habitats during the construction phase
- Impacts on the West Coast rock lobster in the artificial habitats
- Disturbance of pelagic open water habitat
- Noise and vibration impact on fish, invertebrates and birds
- Impacts on marine mammals with increased vessel presence
- Impacts on marine mammals with increased underwater noise
- Change in habitats and system function
- Loss of rocky shore habitat and introduction of artificial habitat
- Impacts on the West Coast rock lobster
- Increased vessel traffic
- Short wave reflections into Table Bay and Granger Bay marina
- Long wave reflections into Granger Bay marina
- Short and long wave reflections on the Granger Bay marina breakwater.
- Impacts of the Granger Bay marina breakwater on the Oceana Power Boat Club
- Impacts of the Granger Bay marina breakwater on Longshore sediment transport
- Increased economic production and GDP
- Increased employment
- Increased household income
- Increase in government revenue
- Increased traffic congestion
- Increase in traffic volumes
- Skills development in the region
- Impact on visual sense of place during construction
- Impact on visual sense of place during operation
- Public space and amenity value
- Tourism and visitor economy
- Recreational boat use in Granger Bay during construction
- Recreational boat use in Granger Bay
- Impact on ecotourism and marine wildlife-associated activities
- Impact on ecotourism and marine wildlife-associated activities
- Disruption from land reclamation
- Impact on coastal access
- Visual impact from viewpoints, landscape features and scenic resources
- Visual impact from viewpoints, landscape features and scenic resources
- Disturbance of archaeological resources
- Disturbance of heritage resources
- Impact on cultural heritage
- Noise, dust and pollution generation
- Waste generation and disposal
- Effects of hazardous substance spills
- Climate-change related risks and impacts

## 8.6 Aspects to be assessed by specialists

The following specialists will conduct specialist assessments of impacts in their respective disciplines (Table 8-3). Terms of Reference for each of the specialist studies are outlined in Section 8.9.

**Table 8-3: Specialist studies.**

| Role | Organisation | Name |
|---|---|---|
| **Archaeological Assessment** | TerraMare Archaeology | John Gribble |
| **Heritage Impact Assessment** | - | Cindy Postlethwayt |
| **Marine Impact Assessment** | Anchor Environmental Consultants | Dr Barry Clark, Amy Wright, Megan Jackson & Adam Rees |
| **Marine Mammal Report** | Sea Search Research and Conservation | Dr Simon Elwen |
| **Oceanographic Impact Assessment** | WML Coast | Enrique Julyan |
| **Socio-economic Assessment** | Urban Econ | Alex Kempthorne & Mwajuma Kamanzi |
| **Transport Impact Assessment** | Motion Consulting Engineers | Sergei Kiewiet |
| **Visual Impact Assessment** | MALA | Megan Anderson |
| **Climate Change Impact Assessment** | SRK Consulting | Philippa Burmeister & Joss Cahi |

## 8.7 Impact Assessment Method and Specialist Studies

This section outlines the impact assessment methodology for the EIA and its specialist studies, based on the DEA 2006 Guideline on Assessment of Alternatives and Impacts as well as the Specialist Protocols (GN R320 and R1130 of 2020).[§]

Impacts are defined as the changes in an environmental parameter that result from undertaking an activity. The change is the difference between the effect on the environmental parameter where the activity is undertaken, compared to that where the activity is not undertaken. Impacts occur over a specific period and within a defined area. Impacts may occur during the construction, post-construction, and decommissioning phases of the development, and may be direct, indirect, and/or cumulative in nature.

- **Direct impacts** are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity. These impacts are usually associated with the construction, operation or maintenance of an activity and are generally obvious and quantifiable.

- **Indirect impacts** of an activity are indirect or induced changes that may occur as a result of the activity (e.g., the reduction of water in a stream that supply water to a reservoir that supply water to the activity). These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken, or which occur at a different place as a result of the activity.

- **Cumulative impacts**, in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant

[§] DEAT 2006. Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006.

when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities.

In order to identify potential impacts (both positive and negative) it is important that the nature of the proposed projects is well understood so that the impacts associated with the projects can be assessed. The process of identification and assessment of impacts will include:

» Determining the current environmental conditions in sufficient detail so that there is a baseline against which impacts can be identified and measured;
» Determining future changes to the environment that will occur if the activity does not proceed;
» Developing an understanding of the activity in sufficient detail to understand its consequences; and
» The determination of significant impacts which are likely to occur if the activity is undertaken.

As per the DEAT Guideline 5: Assessment of Alternatives and Impacts the following methodology is to be applied to the predication and assessment of impacts. Potential impacts should be rated in terms of their:

» **Spatial extent** – The size of the area that will be affected by the impact:
  - Site specific;
  - Local (<2 km from site);
  - Regional (within 30 km of site);
  - National; or
  - International (e.g. Greenhouse Gas emissions or migrant birds).

» **Intensity** – The anticipated severity of the impact:
  - High (severe alteration of natural systems, patterns or processes);
  - Medium (notable alteration of natural systems, patterns or processes); or
  - Low (negligible alteration of natural systems, patterns or processes).

» **Duration** – The timeframe during which the impact will be experienced:
  - Temporary (less than 1 year);
  - Short term (1 to 6 years);
  - Medium term (6 to 15 years);
  - Long term (the impact will cease after the operational life of the activity); or
  - Permanent (mitigation will not occur in such a way or in such a time span that the impact can be considered transient).

» **Reversibility of the Impacts** - the extent to which the impacts are reversible assuming that the project has reached the end of its life cycle (decommissioning phase):
  - High reversibility of impacts (impact is highly reversible at end of project life);
  - Moderate reversibility of impacts;
  - Low reversibility of impacts; or
  - Impacts are non-reversible (impact is permanent).

» **Irreplaceability of Resource Loss caused by impacts** – the degree to which the impact causes irreplaceable loss of resources assuming that the project has reached the end of its life cycle (decommissioning phase):

- High irreplaceability of resources (project will destroy unique resources that cannot be replaced);
- Moderate irreplaceability of resources;
- Low irreplaceability of resources; or
- Resources are replaceable (the affected resource is easy to replace/rehabilitate).

Using the criteria above, the impacts will further be assessed in terms of the following:

» **Probability** –The probability of the impact occurring:
  - Improbable (little or no chance of occurring);
  - Probable (<50% chance of occurring);
  - Highly probable (50 – 90% chance of occurring); or
  - Definite (>90% chance of occurring).

» **Significance** – Will the impact cause a notable alteration of the environment?
  - Low to very low (the impact may result in minor alterations of the environment and can be easily avoided by implementing appropriate mitigation measures, and will not have an influence on decision-making);
  - Medium (the impact will result in moderate alteration of the environment and can be reduced or avoided by implementing the appropriate mitigation measures, and will only have an influence on the decision-making if not mitigated); or
  - High (the impacts will result in major alteration to the environment even with the implementation on the appropriate mitigation measures and will have an influence on decision-making).

» **Status** – Whether the impact on the overall environment will be:
  - Positive - environment overall will benefit from the impact;
  - Negative - environment overall will be adversely affected by the impact; or
  - Neutral - environment overall not be affected.

» **Confidence** – The degree of confidence in predictions based on available information and specialist knowledge:
  - Low;
  - Medium; or
  - High.

Impact mitigation measures will be prepared in line with the mitigation hierarchy – i.e., **avoid, minimise, restore, offset**. Mitigation measures will be incorporated an environmental management programme, which will include the following:

» Quantifiable standards for measuring and monitoring mitigatory measures and enhancements will be set. This will include a programme for monitoring and reviewing the recommendations to ensure their ongoing effectiveness.
» Identifying negative impacts and prescribing mitigation measures to avoid or reduce negative impacts. Where no mitigatory measures are possible this will be stated.
» Positive impacts will be identified and augmentation measures will be identified to potentially enhance positive impacts where possible.

Other aspects to be taken into consideration in the assessment of impact significance are:

» Impacts will be evaluated for the Construction (C) and Operation phases (O) of the development. The assessment of impacts for the decommissioning phase will be brief, as there is limited understanding at this stage of what this might entail. The relevant rehabilitation guidelines and legal requirements applicable at the time will need to be applied;
» Impacts will be evaluated with and without mitigation in order to determine the effectiveness of mitigation measures on reducing the significance of a particular impact;
» The impact evaluation will, where possible, take into consideration the cumulative effects associated with this and other facilities/projects which are either developed or in the process of being developed in the local area; and
» The impact assessment will attempt to quantify the magnitude of potential impacts (direct and cumulative effects) and outline the rationale used. Where appropriate, national standards are to be used as a measure of the level of impact.

Issues and impacts identified to date are set out in **Table 8-4** in relation to the proposed development alternatives. Environmental issues are identified for the following phases of the development:

- Construction (C)
- Post-Construction / Operational (O)

Decommissioning impacts are not considered due to the nature of the proposed development. The issues and impacts described in Table 8-4 are considered for each of the development alternatives proposed to date, which include:

- Alternative 1: No-go alternative
- Alternative 2: Maximum development footprint alternative

Scoping seeks only to identify key issues to be addressed in the assessment phase. During the EIA phase, impacts will be assessed to conclusively determine the nature, significance, consequence, extent, duration and probability of the impacts.

**Table 8-4: Example table for impact assessment**

| Issue | Phase | | Alternative 1: No-Go Alternative | Alternative 3: Proposed development footprint with land reclamation and coastal public space (Preferred Alternative): | Potential mitigation measures or enhancements | Further assessment |
|---|---|---|---|---|---|---|
| | C | O | Impact rating (without mitigation) | | | |
| | | | | | | |

## 8.8 Measures to avoid, reverse, mitigate or manage identified impacts

As described in the scoping report, a constraints and policy-led approach whereby primary specialist assessments were used as informants to the design of the project proposal, was utilised to avoid negative impacts as far as possible. A preliminary identification of mitigation measures is included in Chapter 6. The EAP and specialists, as part of the EIA Phase, will determine appropriate mitigation measures. An Environmental Management Programme (EMPr) will be developed to ensure management and monitoring of additional impacts during the construction and operational phase, as well as any tasks related to rehabilitation or offsets.

## 8.9 Terms of Reference for Specialist Studies

The Terms of Reference (ToR) for the specialist studies will consist of the general assessment requirements outlined in this section of this chapter, along with specific issues identified for each

discipline or specified in the relevant Specialist Protocols. Each of the specialist is required to consider the project in as much detail as required to inform their impact assessment.

It should be noted that the ToRs are not intended to be definitive but rather provide a guide as to the focus of the specific specialist study. The ToRs have been updated to include relevant comments received from Interested and Affected Parties (I&APs) and authorities during review of the Draft Scoping Report.

### 8.9.1 Transport Impact Assessment

A Transport Impact Assessment is being undertaken by Sergei Kiewiet of Motion Consulting Engineers.

The terms of reference for this study are:

- Review the existing transportation and access characteristics of the proposed site and wider area;
- Identify and assess potential transport-related impacts resulting from the 2023 proposed scheme when compared to the scheme as originally assessed using the standard impact rating methodology;
- Assess the construction phase impacts of the transportation of quarry material associated with the proposed development;
- Recommend mitigation measures to minimize potential transport-related impacts associated with the proposed development;
- Identify monitoring measures to ensure the correct implementation and adequacy of recommended mitigation measures, if applicable;
- Indicate whether the development alternatives (current versus approved scheme) are environmentally suitable or unsuitable and identify an environmentally preferred alternative;
- Address any additional issues raised through the public participation process applicable to the specialist field; and
- Propose and implement additional ToR, if required, based on professional expertise, experience and compliance with relevant Department of Environment Affairs and Development Planning (DEA&DP) specialist study guidelines and best practice.

The approved scheme was based on an extensive TIA, which was accepted by the relevant authorities. The TIA for this application will consider whether the impacts of the new application are significantly different from what has already been approved.

### 8.9.2 Socio-Economic Impact Assessment

A Socio-Economic Impact Assessment is being carried out by Alex Kempthorne of Urban Econ Development Economists (Pty) Ltd.

The terms of reference for this study are:

- To provide current information regarding the importance of the V&A in contributing to the local and regional economies. The specialist must provide an updated baseline description of the current economic characteristics of the V&AW and the contribution this makes to the local and regional economies and if relevant add updated maps and data.
- Identify and assess potential economic impacts (positive and negative) resulting from the proposed scheme, using the standardised impact rating methodology below;

- Recommend mitigation measures to minimize impacts and enhance potentially positive economic impacts associated with proposed development;
- Identify monitoring measures to ensure the correct implementation and adequacy of recommended mitigation measures, if applicable;
- Provide a reasoned opinion regarding whether the currently proposed scheme should be authorised from the perspective of the specialist's area of expertise;
- Additional terms of reference as recommended by the relevant specialist, based on professional expertise, experience and compliance with relevant DEA&DP specialist study guidelines and best practice;
- Gender and related considerations during all phases of the proposed development will be considered as required by the competent authority, including the impact that the development proposal may have on the prevalence of HIV/AIDS, sexually transmitted infections ("STI") and Tuberculosis ("TB"), as well as equity and gender related concerns; and
- As part of the public participation process, participate in engagements with user groups such as fishers, ocean users and coastal-access dependent groups; and
- Address any additional issues raised through the public participation process applicable to the specialist field.

As a part of the specialist study the following specified information must be provided by the Socio-Economic Specialist in support of the ICMA Land Reclamation Process:

- How will the proposed development contribute to the social and economic objectives of the local population and the Republic of South Africa? and
- How will the proposed development and reclamation benefit the state socially and economically?
- How will the land reclamation improve social and economic conditions for the population?
- How will the land reclamation influence the local community?
- Will this area be accessible to the public, and if so how will it be accessible?
- Give account to the nature and scope of the employment opportunities from the construction to the operation phase.
    - Skilled
    - Unskilled
    - Permanent jobs
    - Temporary jobs

### 8.9.3 Visual Impact Assessment

The Visual Impact Assessment is being undertaken by Megan Anderson of Megan Anderson Landscape Architects.

The terms of reference for this study are:

- Describe the existing visual and sense-of-place characteristics (baseline description) of the proposed site's surrounding area;
- Identify and assess potential visual and sense-of-place impacts resulting from the proposed development and the alternative scheme using the standard impact rating methodology. In this regard, the specialist assessment must be informed by the Urban Design Controls that will be issued by the V&A;
- Recommend mitigation measures to minimize impacts and enhance potentially positive economic impacts associated with proposed development;

- Identify monitoring measures to ensure the correct implementation and adequacy of recommended mitigation measures, if applicable;
- Provide a reasoned opinion regarding whether the currently proposed scheme should be authorised from the perspective of the specialist's area of expertise;
- Additional terms of reference as recommended by the relevant specialist, based on professional expertise, experience and compliance with relevant HWC, SAHRA, and DEA&DP specialist study guidelines and best practice; and
- Address any additional issues raised through the public participation process applicable to the specialist field.

### 8.9.4 Heritage Impact Assessment

The Heritage Impact Assessment is being undertaken by Cindy Postlethwayt.

The terms of reference for this study are:

- The Heritage Impact Assessment commenced with the submission of a Notification of Intent to Develop in terms of section 38 of the NHRA to Heritage Western Cape;
- The NID incorporated an updated baseline description of heritage resources potentially affected by the proposed development. This draws on existing information forming part of the broader Heritage Impact Assessment for additional land use rights, as well as an updated archaeological assessment of the affected area;
- Identify and assess potential economic impacts (positive and negative) resulting from the proposed development, using the standardised impact rating methodology below;
- Recommend mitigation measures to minimize impacts and enhance potentially positive economic impacts associated with proposed development;
- Identify monitoring measures to ensure the correct implementation and adequacy of recommended mitigation measures, if applicable;
- Provide a reasoned opinion regarding whether the currently proposed scheme should be authorised from the perspective of the specialist's area of expertise;
- Additional terms of reference as recommended by the relevant specialist, based on professional expertise, experience and compliance with relevant HWC, SAHRA, and DEA&DP specialist study guidelines and best practice; and
- Address any additional issues raised through the public participation process applicable to the specialist field.
- In their response to the NID (dated 25 June 2025, included in Appendix E2), Heritage Western Cape (HWC) requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA be submitted. The HIA must, in addition, have specific reference to the following:
    - Archaeological Impact Assessment (comparative assessment: approved vs proposed)
    - Visual Impact Assessment (comparative assessment: approved vs proposed) and including assessment of the accessibility to the water's edge.

It must be noted that the HIA, inclusive of the VIA and AIA, will include a comparative assessment of the approved 2018 straight-line revetment design with the current proposed "cascade" design, as it is a specific requirement from HWC. The HIA will be made available with the EIA Report during the EIA Phase of the application.

### 8.9.5 Marine Impact Assessment

The Marine Impact Assessment will be undertaken by Anchor Environmental Consultants (Pty) Ltd.

The terms of reference for this study are:

» Describe the existing characteristics (baseline) of the marine environment.
» Identify and assess potential marine biota impacts resulting from the proposed activity and all the project alternatives (the current development scheme and the no-go alternative), using the standardised impact rating methodology below;
» Recommend mitigation measures to minimize impacts associated with the proposed development;
» Identify monitoring measures to ensure the correct implementation and adequacy of recommended mitigation measures, if applicable;
» Indicate whether the alternatives under consideration are environmentally suitable or unsuitable and identify the most environmentally preferred alternative;
» Provide a reasoned opinion regarding whether the current 2023 scheme should be authorised from the perspective of the specialist's area of expertise;
» Address any additional issues raised through the public participation process applicable to the specialist field; and
» Additional terms of reference as recommended by the relevant specialist, based on professional expertise, experience and compliance with relevant DEA&DP specialist study guidelines and best practice; and address any additional issues raised through the public participation process applicable to the specialist field.

As a part of the specialist study, the following specified information must be provided by the Marine Specialist in support of the ICMA Land Reclamation Process:

» Impact of reclamation processes on marine environment including biodiversity, and habitat fragmentation and destruction;
» Impact of reclamation processes on fisheries;
» Impacts on water quality including oxygen;
» If the proposed area for reclamation is in proximity to a protected area, how the protected area will be impacted and describe the mitigation measures;
» Describe the type(s) of material to be used for reclamations;
» How the reclaimed land will be developed to ensure minimal marine impacts; and
» Is the material to be used inert, and are there any risks of pollution because of this material?

### 8.9.6 Oceanographic Impact Assessment

The Oceanographic Impact Assessment will be undertaken by Enrique Julyan of WML Coast.

The terms of reference for this study are:

» Review the existing oceanographic characteristics (baseline description) of the proposed site and greater Table Bay;
» Identify and assess potential oceanographic impacts resulting from the proposed activity (construction and operational phase) and the no-go alternative using the pre-determined impact rating methodology. In this regard the specialist must review and comment on the PRDW report and in particular the models upon which the PRDW Wave & Hydrodynamic Modelling Study report is based (i.e. 3D hydrodynamic numerical model);
» Recommend mitigation measures to minimize impacts associated with the proposed development;

» Identify monitoring measures to ensure the correct implementation and adequacy of recommended mitigation measures, if applicable;
» Indicate whether the alternatives under consideration are environmentally suitable or unsuitable and identify an environmentally preferred alternative;
» Address any additional issues raised through the public participation process applicable to the specialist field; and
» Propose and implement additional ToR, if required, based on professional expertise, experience and compliance with relevant Department of Environment Affairs and Development Planning (DEA&DP) specialist study guidelines and best practice.

### 8.9.7 Climate Change Impact Assessment

The Climate Change Impact Assessment will be undertaken by Philippa Burmeister & Joss Cahi of SRK Consulting.

The terms of reference for this study are:

» Obtain climate baseline data (historical climate conditions) from the City of Cape Town City Hall Station.
» Compile climate baseline information to include the following:
    - Average and maximum temperatures
    - Rainfall patterns
    - Windspeeds
    - Humidity and Evaporation were available
» Report the prevalence and risk of natural disasters (tsunami's, earthquakes, fires, landslides and flooding) for the site, including any trends based on available public data.
» Review and interpret findings of the 2023 Wave and Hydrodynamic Modelling Study by PRDW to describe the baseline and post development current speed and direction, surface seawater temperature, residual circulation, wave heights and wave-induced bed shear stresses.
» Obtain P50 median climate change projections for the area based on the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) projections, downscaled for the region using the World Bank Climate Change Knowledge Portal and the site using the IPCC interactive atlas. These projections will also be supplemented with the CSIR Greenbook and the CSIR Climate Change projections for South Africa. Projections from these sources will include the following parameters:
    - Minimum, average and maximum temperature
    - Annual average and extreme 1 day rainfall
    - Sea level Rise
    - Sea Surface Temperature
    - Ocean pH at surface
» Undertake a desktop review of papers to inform potential changes in storm surge, coastal erosion and groundwater salinization as a result of the projected climatic changes as above.
» Based on the climate baseline and climate risk projections identify risks for moderate (SSP3-7.0) and high climate change scenarios (SSP5-8.5) The scenarios will be reported for all project phases aligned to the IPCC CMIP6 timeframes (2040, 2060 and 2100).

## 8.10 Parallel process in terms of the National Environmental Management: Integrated Coastal Management Act, 2008

The proposed development requires both a Scoping and EIA process and an application to the Minister in terms of the ICMA. The Scoping and EIA process is required in terms of the 2014 EIA Regulations, as amended, and the competent authority for the Scoping and EIA process is determined based on section 24C of NEMA as the provincial authority, the Western Cape's DEA&DP.

In terms of section 7C of the Integrated Coastal Management Act (Act 24 of 2008), the reclamation of land requires a **pre-approval** by the national Minister of Environmental Affairs to be ratified by Parliament, prior to an environmental authorisation being issued in terms of NEMA, and a **final decision** by the Minister after an environmental authorisation is granted.

The intended integration of the two processes has been clarified by the two authorities involved and is summarised in Figure 1-6 below. Notable interactions between the processes include:

- The land reclamation application must be submitted to the national authority before an application for EA can be submitted to DEADP.
- Both processes involve specialist studies of potential impacts on the environment. Because these studies are required at an early stage in the ICMA application process, they have been concluded earlier than would ordinarily be the case in a Scoping and EIA. Specialist studies included in this Scoping Report are draft impact assessments, to be updated and finalised during the EIA phase.
- The Scoping and EIA process will occur in parallel with the Ministerial Pre-approval and Parliamentary Ratification of the application for reclamation.
- DEADP will make a decision on the application for EA based on the information presented in the final EIA Report – however, an EA may not be granted without the pre-approval being in place.
- The Environmental Authorisation is required for the Minister to make a final decision on the land reclamation application.

On 24 July 2025, DFFE confirmed in a letter to the V&A Waterfront that "the V&AW pre-approval application has been received by DFFE on 11 July 2025; consequently, V&AW is at liberty to apply for an environmental authorisation with the relevant Competent Authority."

## 8.11 Schedule for the Scoping and Environmental Impact Assessment

A project schedule depicting key tasks and associated timelines, as well as dependencies, is included as Figure 1-6.

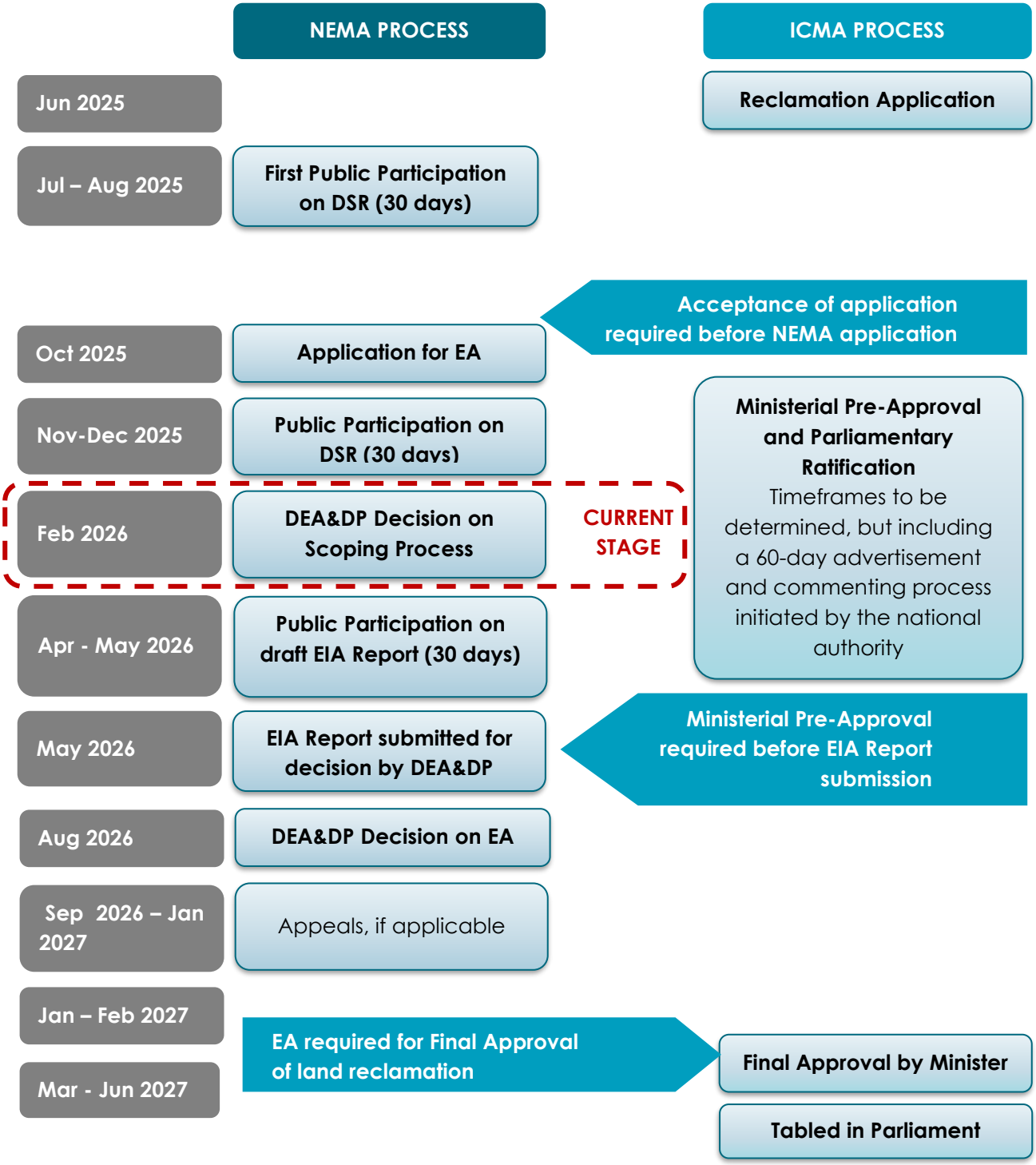


**Figure 8-1: The Scoping and EIA process to be followed alongside the ICMA application, with approximate dates**

# CHAPTER 9
# REFERENCES

**January 2026**

**Final Scoping Report**

Infinity Environmental

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# DECLARATION OF THE APPLICANT

I, **NEIL SCHWARTZ**, ID number **5805265097086**, in my duly authorised capacity, hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;
- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;
- I appointed the Environmental Assessment Practitioner ("EAP") which meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;
- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation, including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimate person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;
- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

Signature of the Applicant: 

Date: 14 JANUARY 2026

Name of company: **V&A Waterfront Holdings (Pty) Ltd**

# DECLARATION OF THE EAP

I, **JEREMY THEMBA ROSE**, EAP Registration number **2019/1116**, as the appointed EAP, hereby declare/affirm the correctness of the:

- Information provided in this Scoping Report and any other documents/reports submitted in support of this Scoping Report;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent, other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;

Signature of the EAP: 

Date: 14 January 2025

EAP Company: **Infinity Environmental (Pty) Ltd**