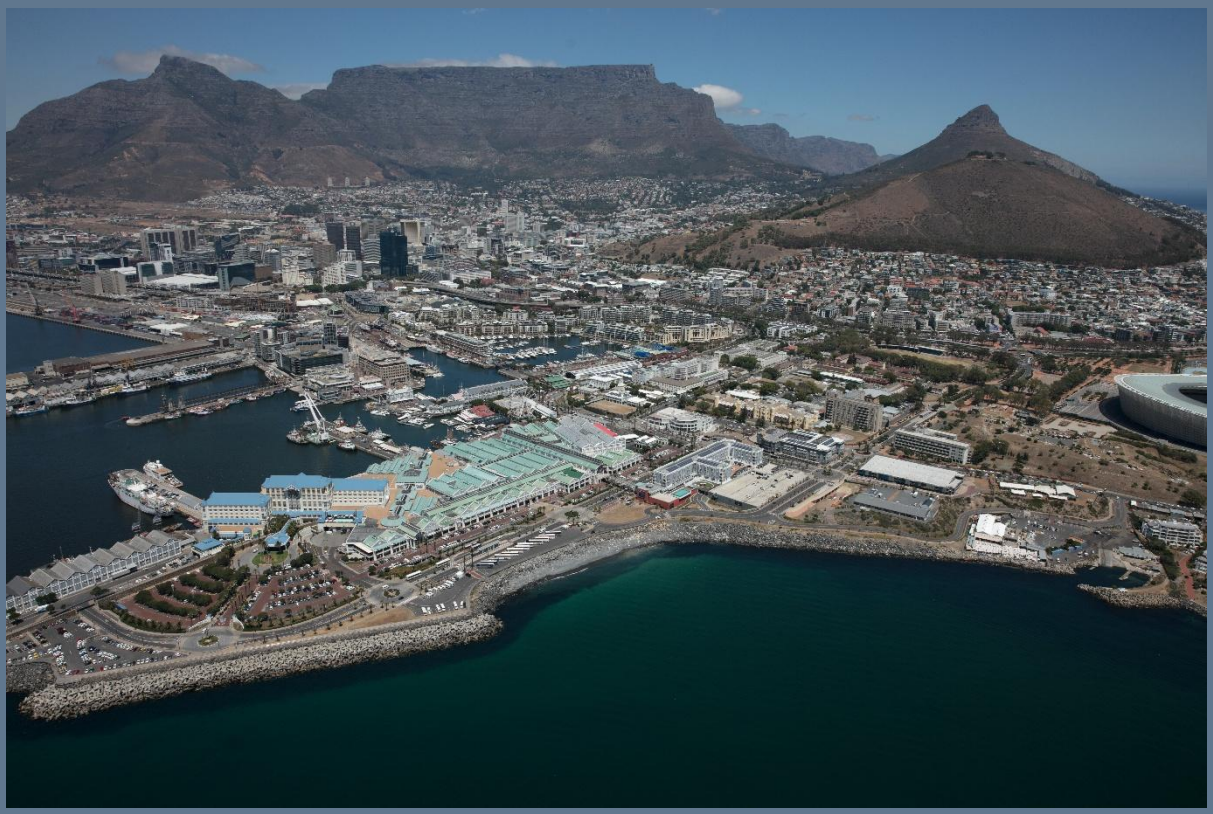
PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT

MIXED-USE DEVELOPMENT ON PROJECT PARCELS O, P, A1, AND A2 ON ERVEN 158570 RE, 149294 RE, 177854 AND 179076, BREAKWATER PRECINCT, V&A WATERFRONT, CAPE TOWN BY THE V&A WATERFRONT

EA Application Ref. No.: 16/3/3/6/7/1/A7/4/3064/26



August 2026

PART OF

Cover photo: View of the V&A Waterfront

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EA Application Ref. No.: 16/3/3/6/7/1/A7/4/3064/26

2026

Report prepared for:

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Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

APRIL 2024

EXECUTIVE SUMMARY

PROPOSED MIXED USE DEVELOPMENT ON PROJECT PARCELS O, P AND a1 & a2 ON ERVEN 158570 RE, 149294 RE, 177854 AND 179076 BREAKWATER PRECINCT, V&A WATERFRONT, CAPE TOWN.

Introduction

The Victoria & Alfred Waterfront (V&AW) in the City of Cape Town (CoCT) is a 123-hectare (-ha) unique urban regeneration project that, over the past thirty years, has transformed a historic and previously under-utilised section of the Port of Cape Town into the City's premier tourist, retail, entertainment, commercial, and residential destination.

The V&A Waterfront (V&AW—the proponent) is proposing a mixed-use development within its Breakwater Precinct, on Erven 158570 RE, 149294 RE, 177854 and 179076, situated north of the Table Bay Hotel (Figure 1). The project will have a total development footprint of approximately 12 700 m^2 (1,27ha). The site earmarked for redevelopment is currently used as an overflow parking area and site offices for adjoining construction projects.

The development will comprise residential and hotel/tourism-related uses, as well as facilities intended for cultural and public-oriented uses. These include education, cultural, and visitor-focused activities, with supporting retail uses. In addition, the proposal includes the development of a new public open space, Atlantic Park, and an extension of the existing promenade. These areas will provide space for public use, recreation, and enjoyment of the waterfront environment. The proposal also includes associated infrastructure required to support the development, where and if applicable. The site is currently zoned as Mixed Use 3 (MU3) in terms of the City of Cape Town's Municipal Planning Bylaw (2025 as amended).

Assessment Process and Outcomes

The proposed development was assessed through a Basic Assessment (BA) Process informed by several specialist assessments, including a Heritage Impact Assessment (HIA), Archaeology Impact Assessment (AIA), Visual and Townscape Impact Assessment (VIA), Socio-economic Impact Assessment (SEIA), Marine Ecology Compliance Statement and Traffic Impact Statement (TIS). A Civil Aviation Compliance Statement is currently in progress, and the findings will be incorporated into the Draft Basic Assessment Report (BAR) to be circulated during the in-process public participation process.

The assessment considered potential impacts on the environment, heritage, visual and archaeological resources, socio-economic receptors, ranging from the level of individual workers/households, through to the broader regional and national government and the surrounding coastal and urban context throughout the project life-cycle.

From an ecological perspective, no terrestrial or aquatic biodiversity impacts are anticipated, as the site is located within a built-up, highly transformed urban area on reclaimed land (inherently artificial) and therefore does not support natural vegetation, aquatic features, or faunal habitat. Furthermore, the site has very low marine sensitivity, as it is physically separated from the marine environment by existing coastal infrastructure and lacks functional connectivity to marine habitats. As such, no significant impacts on the coastal and marine environment are expected, provided that appropriate mitigation measures are implemented.

Socio-economic

The socio-economic assessment found that the proposed development will result in substantial positive socio-economic benefits during both the construction and operational phases. During construction, the development is expected to generate significant temporary economic activity, employment opportunities, household income, and government revenue through direct, indirect, and induced effects. Approximately 5 100 temporary jobs are expected to be supported, while the construction phase is estimated to contribute approximately R4.3 billion in economic output and around R1.7 billion to GDP. During operation, the development is expected to generate sustained positive economic benefits through ongoing tourism, residential, retail, hospitality, and commercial activity. Approximately 369 permanent jobs are expected to be created, together with ongoing household income generation, increased government revenue, and skills development opportunities. The proposed development will also improve public open space, amenity value, and public access through the inclusion of Atlantic Park, enhanced promenade areas, and improved public realm infrastructure. In addition, the development is expected to positively contribute to the visitor economy and strengthen the V&A Waterfront's role as a major tourism and economic node within Cape Town. Negative socio-economic impacts relate to temporary construction-related impacts associated with noise, dust, traffic, and health and safety risks, all of which are expected to remain localised, short term, and manageable through standard best practice and health and safety mitigation measures.

Heritage, Archaeology and Visual

From a heritage perspective, the site itself has limited intrinsic heritage significance, as it largely comprises reclaimed and previously disturbed land. The Granger Bay Precinct Phase 1B site has the potential, albeit low, to encounter maritime archaeological and/or submerged pre-colonial archaeological heritage resources below the modern fill, in or on the former seabed. The site itself is relevant to visual and spatial relationships with surrounding heritage resources, the historic urban and coastal context, the coastal edge, and views towards Table Bay and Robben Island. As such, the heritage assessment was informed largely by the VIA and the AIA. Potential impacts on buried maritime archaeological or submerged pre-colonial archaeological resources may occur during construction. However, these can be effectively managed through archaeological monitoring and chance-find procedures. No significant operational impacts on archaeological resources are anticipated.

The VIA found that temporary construction-phase visual impacts will be low and localised, and can be mitigated through appropriate construction management measures. During operation, the proposed development is expected to positively enhance the visual character and sense of place of the area through improved public realm design, active waterfront interfaces, landscaping, enhanced promenade access, and improved visual and physical connections to the sea.

Traffic

The subject site will be accessed directly from Breakwater Boulevard (Blvd) which is accessed via Granger Bay Boulevard (Blvd). Traffic modelling and analysis has shown that this route has excess capacity during peak periods. Traffic on Granger Bay Blvd is generated by a mix of land uses including offices and a strong retail component. Peak traffic on Breakwater Blvd is dominated by retail activity (primarily Victoria Wharf shopping centre). The proposed developments (primarily hotel, residential and cultural) will generate traffic in the opposite direction to office traffic and will typically avoid retail peaks. The AM distribution is beneficial from a capacity perspective, as it utilises spare capacity in

the non-peak direction Therefore, they will not contribute significantly to existing periods of peak demand.

The development of parcels O, P & a1/a2 in Phase 1B will have a minor impact on roads inside and outside the V&A, requiring no change to the road network. This is due to a combination of the counter-peak flow direction of traffic generated by residential development in general, and the relatively small scale of the development. Private vehicle trips have been calculated with no assumed shift to alternative modes, notwithstanding the intention of the V&AW to encourage a shift to public transport. Parking will follow the V&A's standard approach of providing a portion on-site with spillover in nearby parking garages, taking advantage of the varying periods when different land uses exhibit peak demand. While there is no required minimum level of parking for the PT2 zoning where the site is located, the V&A is providing sufficient parking for all uses in the Breakwater and Pierhead precincts. The V&A is providing services and infrastructure for micromobility to assist with the distribution of parking demand and to improve access to public transport, which is conveniently located close to the development site.

It is therefore recommended that the proposed development be approved without additional road infrastructure.

Civil Aviation

A Civil Aviation Compliance statement will be prepared and included in the Draft BAR.

Summary of specialist study findings

Overall, the specialist studies confirm that all potential negative impacts associated with the development can be effectively avoided, managed, or mitigated. As a result, besides impacts on submerged pre-colonial archaeological resources (which has a post-mitigation significance of "Medium" negative), all residual negative impacts associated with the construction phase could be reduced to a significance between "Low" and "Insignificant". Residual negative impacts are those remaining after the implementation of mitigation measures. Furthermore, despite the "Medium" negative significance rating, the archaeological specialist stated that the development can be considered archaeologically acceptable and can be authorised, provided that the mitigation measures are implemented. Consequently, the specialists unanimously found that the negative impacts associated with the construction phase do not present a barrier to authorisation—which is further exemplified by the fact that no negative operational phase impacts were identified.

More importantly, the potential benefits afforded by the development throughout the construction and operational phase, are predicted to outweigh the negative impacts. Most positive impacts are assessed as at least of "Medium" positive significance both before and after optimisation measures are applied, with one construction phase impact and six operational impacts assessed as being of "High" positive significance should optimisation measures be implemented. These positive impacts relate primarily to socio-economic benefits, including employment generation during both the construction and operational phases, increased tourism activity, investment and revenue generation, improved public spaces and facilities, and enhancement of the visual character of the precinct.

The cumulative impact assessments similarity indicates a positive overall outcome, with the SEIA, VIA and HIA all rating cumulative impacts as positive. These range from "Low" positive for Visual/Landscape and Heritage receptors to "Medium-High" positive for socio-economic receptors, confirming that the development performs well within its broader cumulative context.

Should the development not proceed (No-Go option), both the heritage, visual and socio-economic specialists indicated that continued underutilisation of the site would be undesirable as it would result in a deterioration of its current condition and have negative implications for the broader heritage context, visual and townscape quality, and socio-economic benefits. In this regard, both the HIA and VIA rated the heritage and visual impacts resulting from not proceeding with the development and continued underutilisation of the site as being of "Low" negative significance. The SEIA rated the loss of potential socio-economic benefits as being of "Medium" negative significance due to the notable loss of potential benefits. These findings further highlight the importance of proceeding with the development.

Conclusions

The V&A Waterfront is a key mixed-use tourism and commercial precinct and one of the city's primary visitor destinations, supporting tourism expenditure, employment, and broader economic activity in Cape Town and the Western Cape. Within this context, the proposed development is considered both needed and desirable, as it responds to demand for additional mixed-use development in the V&A Waterfront and Cape Town's inner city, is close to existing amenities, and is expected to generate significant socio-economic, tourism, urban regeneration, and public amenity benefits, thereby supporting the V&A Waterfront's key roles.

The site represents one of the few remaining parcels within the V&A suitable for this type of mixed-use development, and which already benefits from existing development rights. At present, it is underutilised and of limited economic or cultural value, being largely used for parking and temporary storage. Its redevelopment will therefore optimise the use of this previously transformed inner-city land within an established urban precinct. Existing service infrastructure will be utilised, meaning no major bulk infrastructure upgrades are required. From a legislative and planning perspective, the development aligns with relevant national, provincial, and local legislation, spatial planning policies, frameworks, and plans, and is further appropriately zoned as Mixed Use 3 (MU3).

Overall, the proposed development is expected to result in strong long-term net positive socio-economic, public realm, tourism, and urban amenity benefits, as well as improvements to sense of place, visual character, and townscape quality, extending across both the construction and operational phases. These benefits outweigh the limited, short-term, localised construction-related impacts, which can be effectively managed through mitigation. In addition, no operational negative impacts have been identified.

Based on the findings of the specialist studies and the BA process, it is the EAP's reasoned opinion that the proposed development is acceptable from an environmental, social, economic, and heritage perspective. No significant adverse impacts are anticipated, while meaningful net positive benefits are expected to be realised. It is therefore recommended that Environmental Authorisation be granted. This recommendation is subject to the condition that all essential mitigation, monitoring, and management measures outlined in the EMPr, as well as any additional conditions imposed by the competent authority, are fully implemented to ensure that potential impacts are avoided, minimised, or managed to acceptable levels.

Summary of the impact assessment

A summary of all positive and negative impacts identified by the specialists, together with their significance ratings before and after mitigation and optimisation measures, is provided in the table below.

Impact	Pre-Mitigation/Optimisation Significance	Post-Mitigation/Optimisation Significance
Construction Phase		
Marine Impacts		
Impact of Pollution on the Marine Environment	INSIGNIFICANT	INSIGNIFICANT
Socio-economic Impacts		
Impact on gross output and GDP	MEDIUM-POSITIVE	MEDIUM-HIGH POSITIVE
Impact on employment	MEDIUM-POSITIVE	HIGH POSITIVE
Impact on household income	MEDIUM-POSITIVE	MEDIUM-HIGH POSITIVE
Impact on government revenues	MEDIUM-POSITIVE (Optimisation Not Applicable)	
Impact associated with noise and dust pollution	LOW NEGATIVE	VERY LOW NEGATIVE
Impact associated with physical health and safety concerns	LOW NEGATIVE	VERY LOW NEGATIVE
Archaeological Impacts		
Impact on maritime archaeological resources.	MEDIUM-HIGH NEGATIVE	LOW NEGATIVE
Impact on submerged pre-colonial archaeological resources	HIGH NEGATIVE	MEDIUM NEGATIVE*
Visual Impacts		
Impact on sense of place (visual) and townscape resources	LOW NEGATIVE	VERY LOW NEGATIVE
Operational Phase		
Socio-economic Impacts		
Impact on gross output and GDP	MEDIUM-HIGH POSITIVE	HIGH POSITIVE
Impact on employment	MEDIUM-HIGH POSITIVE	HIGH POSITIVE
Impact on household income	HIGH POSITIVE	HIGH POSITIVE
Impact on government revenues	HIGH-POSITIVE (Optimisation Not Applicable)	
Impact on skills development	LOW POSITIVE	MEDIUM POSITIVE
Impact on public open space and amenity value	MEDIUM-HIGH POSITIVE	HIGH POSITIVE
Impact on the visitor economy	MEDIUM-HIGH POSITIVE	HIGH POSITIVE
Visual Impacts		
Impact on sense of place (visual) and townscape resources)	LOW POSITIVE	MEDIUM

Cumulative Impacts (With and Without Mitigation/Optimisation)	
Socio-Economic Considerations	**MEDIUM-HIGH POSITIVE**
Visual and Townscape Considerations	**LOW POSITIVE**
Combined Heritage Considerations (Incl. Socio-Economic, Archaeological, and Visual and Townscape Considerations).	**LOW POSITIVE**
The No-Go Alternative (Mitigation/Enhancement Not Applicable)	
Marine Considerations	**INSIGNIFICANT**
Socio-Economic Considerations	**MEDIUM NEGATIVE**
Archaeological Considerations	**INSIGNIFICANT**
Visual and Townscape Considerations	**INSIGNIFICANT**
Combined Heritage Considerations (Incl. Socio-Economic, Archaeological, and Visual and Townscape Considerations).	**LOW NEGATIVE**

* Note although it is unlikely that the excavation will encounter archaeological material, should this be encountered during deep piling possible mitigation would not be possible.

BASIC ASSESSMENT REPORT

THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

APRIL 2024

(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

(This must Include an overview of the project including the Farm name/Portion/Erf number)

PROPOSED MIXED USE DEVELOPMENT ON PROJECT PARCELS O AND P AND a1 &a2 ON ERVEN 158570 RE, 149294 RE, 177854 AND 179076 BREAKWATER PRECINCT, V&A WATERFRONT, CAPE TOWN.

The Victoria & Alfred Waterfront (V&AW) in the City of Cape Town (CoCT) is a 123-hectare (-ha) unique urban regeneration project that, over the past thirty years, has transformed a historic and previously under-utilised section of the Port of Cape Town into the City's premier tourist, retail, entertainment, commercial, and residential destination. The V&A Waterfront (V&AW—the proponent) is now proposing a mixed-use development within its Breakwater Precinct, on Erven 158570 RE, 149294 RE, 177854 and 179076, situated north of the Table Bay Hotel (Figure 1). The site earmarked for redevelopment is currently used as an overflow parking area and site offices for adjoining construction projects. The project involves the redevelopment of the site into a mixed-use precinct with a total development footprint of approximately 12 700 m^2 (1,27ha). It will comprise three primary development parcels, namely Parcels O, P and a1 &a2, as well as the expansion of the existing promenade and the creation of a new public open space, Atlantic Park. The proposal also includes associated infrastructure required to support the development, where and if applicable. The site is

zoned as Mixed Use 3 (MU3) in terms of the City of Cape Town's Municipal Planning Bylaw (2025 as amended).

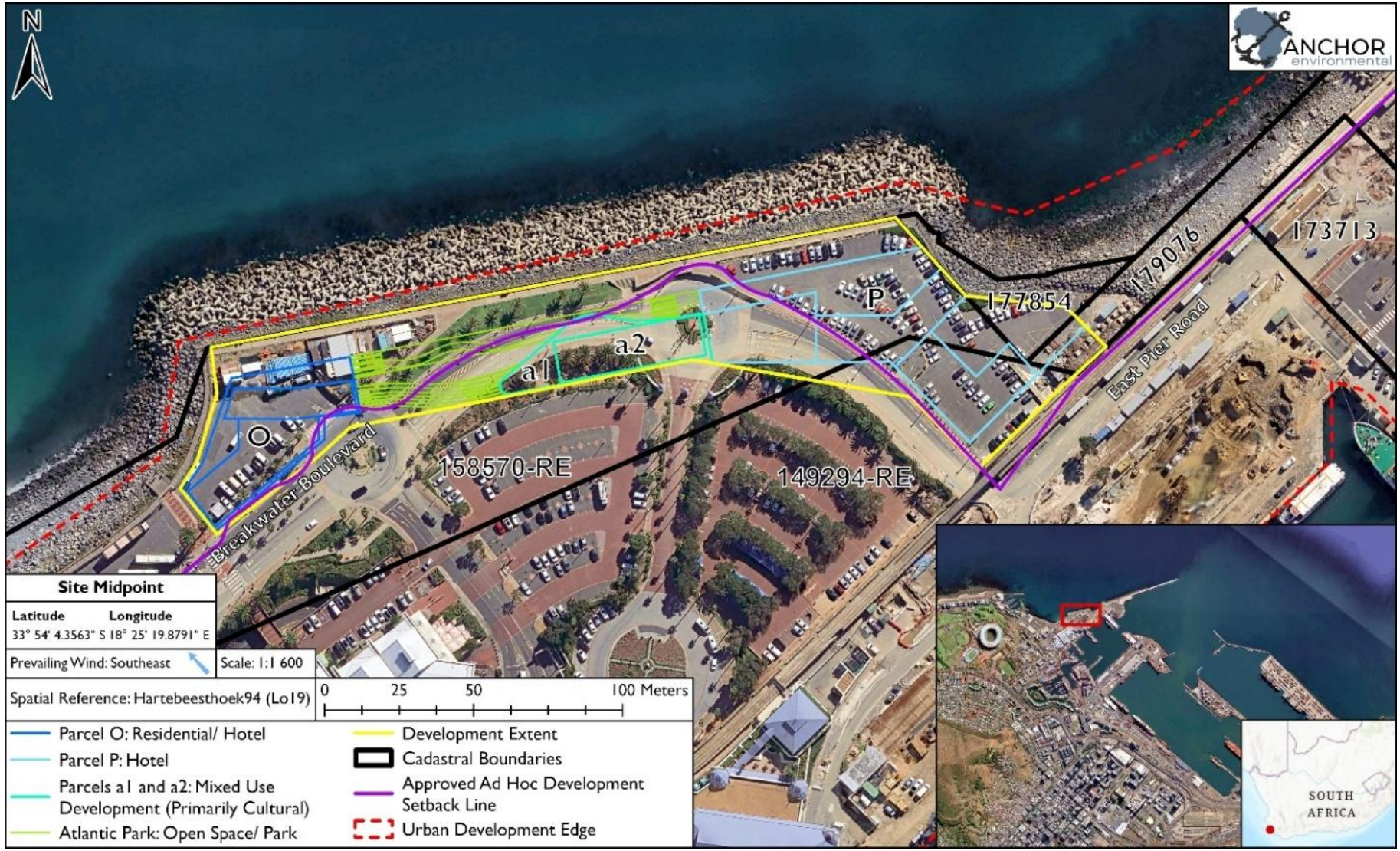


Figure 1. Location of the proposed mixed-use development on Erven 158570 RE, 149294 RE, 177854 and 179076 within the V&A Waterfront, Cape Town. The original layout and land use of the site are also visible, including existing infrastructure such as roads, parking areas, landscaped lawns with palm trees, and storage containers.

IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation (EA).

2. The "EIA" Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 19998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".

3. *Submission of documentation, reports and other correspondence:*

   The Department has adopted a digital format for corresponding with proponents/applicants or the general public. If there is a conflict between this approach and any provision in the legislation, then the provisions in the legislation prevail. If there is any uncertainty about the requirements or arrangements, the relevant CA (CA) must be consulted.

   The Directorate: Development Management has created generic e-mail addresses for the respective Regions, to centralise their administration. Please make use of the relevant general administration e-mail address below when submitting documents:

   DEADPEIAAdmin@westerncape.gov.za
   Directorate: Development Management (Region 1):
   City of Cape Town; West Coast District Municipal area;
   Cape Winelands District Municipal area and Overberg District Municipal area.

   DEADPEIAAdmin.George@westerncape.gov.za
   Directorate: Development Management (Region 3):
   Garden Route District Municipal area and Central Karoo District Municipal area

General queries must be submitted via the general administration e-mail for EIA related queries. Where a case-officer of Department of Environmental Affairs and Development Planning (DEA&DP) has been assigned, correspondence may be directed to such official and copied to the relevant general administration e-mail for record purposes.

All correspondence, comments, requests and decisions in terms of applications, will be issued to either the applicant/requester in a digital format via email, with digital signatures, and copied to the Environmental Assessment Practitioner ("EAP") (where applicable).

4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.

5. All applicable sections of this BAR must be completed.

6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority (CA). If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.

7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this

Department's website at http://www.westerncape.gov.za to check for the latest version of this BAR.

8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an EA in terms of the NEMA EIA Regulations when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the CA.

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.

10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.

11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.

12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.

13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.

14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link https://screening.environment.gov.za/screeningtool to generate the Screening Tool Report. The screening tool report must be attached to this BAR.

15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA"), the submission of the Report must also be made as follows, for-
    Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

    Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licensing Authority or this Department's Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

DEPARTMENTAL DETAILS	
CAPE TOWN OFFICE: **DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)** (City of Cape Town, West Coast District, Cape Winelands District & Overberg District)	**GEORGE REGIONAL OFFICE:** **DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3)** (Central Karoo District & Garden Route District)
The completed Form must be sent via electronic mail to: DEADPEIAAdmin@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 1) at: E-mail: DEADPEIAAdmin@westerncape.gov.za Tel: (021) 483-5829 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000	The completed Form must be sent via electronic mail to: DEADPEIAAdmin.George@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 3) at: E-mail: DEADPEIAAdmin.George@westerncape.gov.za Tel: (044) 814-2006 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development **must** be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to):

	o Watercourses / Rivers / Wetlands o Flood lines (*i.e.,* 1:100 year, 1:50 year and 1:10 year where applicable); o Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): o Ridges; o Cultural and historical features/landscapes; o Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as **Appendix C**. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as **Appendix D**.
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as **Appendix A3**.

ACRONYMS

AIA:	Archaeological Impact Assessment
BA:	Basic Assessment
BA:	Bachelor of Arts
BAR:	Basic Assessment Report
BCom:	Bachelor of Commerce
BGCMA:	Breede Gouritz Catchment Management Agency
BioNet:	Biodiversity Network
BSc:	Bachelor of Science
BSP:	Biodiversity Spatial Plan
CA:	Competent Authority
CBA:	Critical Biodiversity Area
CBD:	Central Business District
CCT:	City of Cape Town (also see CoCT)
CMP:	Coastal Management Programme
CoCT:	City of Cape Town (also see CCT)
CPP:	Coastal Public Property
CPZ:	Coastal Protected Zone
CRR:	Comments and Response Report
DAFF:	Department of Forestry and Fisheries
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DFFE:	Department of Forestry, Fisheries and the Environment

DHS:	Department of Human Settlement
DMS:	Development Management Scheme
DoA:	Department of Agriculture
DoH:	Department of Health
DSDF:	District Spatial Development Framework
DWS:	Department of Water and Sanitation
EA:	Environmental Authorisation
EAP:	Environmental Assessment Practitioner
EAPASA:	Environmental Assessment Practitioner Association of South Africa
ECO:	Environmental Control Officer
EFZ:	Estuarine Functional Zone
EGL:	Existing Ground Level
EGS:	Environmental & Geography Science
EIA:	Environmental Impact Assessment
EMF:	Environmental Management Framework
EMP:	Environmental Management Plan
EMPr:	Environmental Management Programme Report
ESAs:	Ecological Support Areas
GBA:	Gross Building Area
GDP:	Gross Domestic Product
GIS:	Geographic Information Systems
Ha:	Hectare
HIA:	Heritage Impact Assessment
HWC:	Heritage Western Cape
I&AP	Interested and Affected Party
IAIAsa:	Internation Association of Impact Assessments South Africa
ICMA:	Integrated Coastal Management Act, Act 24 of 2008
IDP:	Integrated Development Plan
IEM:	Integrated Environmental Management
IUCN:	International Union for Conservation of Nature
IWRM:	Integrated Water Resource Management
KBAs:	Key Biodiversity Areas
LN:	Listing Notice
LUPA:	Land Use Planning Act, 2014
MCom:	Master of Commerce
MMP:	Maintenance Management Plan
MPAs:	Marine Protected Area
MSc:	Master of Science
MSDF:	Municipal Spatial Development Framework
NBA:	National Biodiversity Assessment
NDP:	National Development Plan
NEM:AQA:	National Environmental Management: Air Quality Act, Act 39 of 2004
NEMA:	National Environmental Management Act, Act 107 of 1998
NEMBA:	National Environmental Management Biodiversity Act, Act 10 of 2004
NEMPAA:	National Environmental Management: Protected Areas Act, Act 57 of 2003
NEM:WA:	National Environmental Management Waste Act, Act 59 of 2008
NFEPA:	National Freshwater Ecosystem Priority Areas
NHRA:	National Heritage Resources Act, Act 25 of 1999
NID:	Notice of Intent to Develop
NSBA:	National Spatial Biodiversity Assessment

NWA:	National Water Act, Act 36 of 1998
PA:	Protected Area
PAYE:	Pay As You Earn
PDM:	Public and Development Management
PES:	Present Ecological State
PPP:	Public Participation Process
PSDF:	Provincial Spatial Development Frame
RNID:	Record of Decision for the Notice of Intent to Develop (NID)
RSA:	Republic of South Africa
S&EIA:	Scoping and Environmental Impact Assessment
S&EIAr:	Scoping and Environmental Impact Assessment Report
SEIA	Socio-Economic Impact Assessment
SACNASP:	South African Council for Natural Scientific Professions
SAHRA:	South African Heritage Resources Agency
SANBI:	South Africa National Biodiversity Institute
SDF:	Spatial Development Framework
SDP:	Site Development Plan
SMA:	Special Management Area
SANDP:	South African National Development Plan
SPLUMA:	Spatial Planning and Land Use Management Act, Act 16 of 2023
SSV:	Site Sensitivity Verification
SSVR:	Site Sensitivity Verification Report
SWSA:	Surface Water Strategic Water Source Area
TOR:	Terms of Reference
UCT:	University of Cape Town
VAT:	Value-Added Tax
V&AW:	Victoria & Alfred Waterfront
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government
WCPSP:	Western Cape Provincial Strategic Plan
WCSDF:	Western Cape Provincial Strategic Development Framework
WetCon:	Wetland Condition
WULA:	Water Use Licence Application

ATTACHMENTS

Note: The Appendices must be attached to the BAR as per the list below. Please use a ✓ **(**tick) or a **x** (cross) to indicate whether the Appendix is attached to the BAR.

The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A1:	**Locality Map**	✓
	Appendix A2:	**Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning**	**x**
	Appendix A3:	**Map with the GPS co-ordinates for linear activities**	**x**
Appendix B:	**Appendix B1:**	**Site development plan(s)**	✓
	Appendix B2	**A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;**	✓
Appendix C:	**Photographs**		✓
Appendix D:	**Biodiversity overlay map**		✓
Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.**		
	Appendix E1:	**Final comment/ROD from HWC**	**x**
	Appendix E2:	**Copy of comment from Cape Nature**	**x**
	Appendix E3:	**Final Comment from the Department of Water and Sanitation (DWS)**	**x**
	Appendix E4:	**Comment from the Department of Environmental Affairs (DEA): Oceans and Coast**	**x**
	Appendix E5:	**Comment from the Department of Forestry and Fisheries (DAFF)**	**x**
	Appendix E6:	**Comment from WCG: Transport and Public Works**	**x**
	Appendix E7:	**Comment from WCG: Department of Agriculture (DoA)**	**x**

	Appendix E8:	**Comment from WCG: Department of Human Settlement (DHS)**	**x**
	Appendix E9:	**Comment from WCG: Department of Health (DoH)**	**x**
	Appendix E10:	**Comment from DEA&DP: Pollution Management**	**x**
	Appendix E11:	**Comment from DEA&DP: Waste Management**	**x**
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	**x**
	Appendix E13:	**Comment from DEA&DP: Air Quality**	**x**
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	**x**
	Appendix E15:	**Comment from the local authority**	**x**
	Appendix E16:	**Confirmation of all services (water, electricity, sewage, solid waste management)**	**✓**
	Appendix E17:	**Comment from the District Municipality**	**x**
	Appendix E18:	**Copy of an exemption notice**	**x**
	Appendix E19	**Pre-approval for the reclamation of land**	**✓**
	Appendix E20:	**Proof of agreement/Terms of Reference (TOR) of the specialist studies conducted.**	**✓**
	Appendix E21:	**Proof of zoning with associated land use rights**	**✓**
	Appendix E22:	**Proof of public participation agreement for linear activities**	**x**
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.**		**✓**
Appendix G:	**Specialist Report(s)**		**✓**
	Appendix G1	**Socio-Economic Impact Assessment**	**✓**
	Appendix G2	**Heritage Impact Assessment**	**✓**

	Appendix G3	**Archaeological Impact Assessment (HIA Annexure C)**	✓
	Appendix G4	**Townscape and Visual Impact Assessment (HIA Annexure D)**	✓
	Appendix G5	**Marine Compliance Statement**	✓
	Appendix G6	**Traffic Impact Statement**	✓
Appendix H:	**Environmental Management Programme Report (EMPr)**		✓
Appendix I:	**Screening tool report**		✓
Appendix J:	**The impact and risk assessment for each alternative**		**Included in Section H of this document**
Appendix K:	**Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline**		**Included in Section E of this document**
Appendix L:	**Site Sensitivity Verification Report**		✓
Appendix M:	**Zoning Approval Letter**		✓
Appendix N:	**Any other attachments must be included as subsequent appendices**		✓
	Appendix N1	**CV of EAPN**	✓

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	**CAPE TOWN OFFICE: REGION 1**		GEORGE OFFICE: BEGION 3
	(City of Cape Town, West Coast District	(Cape Winelands District & Overberg District)	(Central Karoo District & Garden Route District)
Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	V&A Waterfront Holdings (Pty) Ltd		
Name of contact person for Applicant/Proponent (if other):	Neil Schwartz		
Company/ Trading name/State Department/Organ of State:	V&A Waterfront Holdings (Pty) Ltd		
Company Registration Number:	2006 / 02443 / 07		
Postal address:	P.O. Box 50001		
	Waterfront, Cape Town	Postal code:8002	
Telephone:	(021) 408 7678	Cell: 082 777 7330	
E-mail:	nschwartz@waterfront.co.za	Fax: N/A	
Company of EAP:	Anchor Environmental Consultants (Pty) Ltd		
EAP name:	**Registered Project EAP:** Cheruscha Swart (Reg. EAP) **Supporting Team:** Michael Armitage; Steve September (Cand. EAPs).		
Postal address:	Suite 8, Steenberg House, Silverwood Cl, Steenberg Office Park		
	Tokai, Cape Town	Postal code: 7945	
Telephone:	(021) 701 3420	Cell: 081 481 7914	
E-mail:	cher@anchorenvironmental.co.za / michael@anchorenvironmental.co.za / steve@anchorenvironmental.co.za	Fax: N/A	
Qualifications:	**Registered Project EAP: Cheruscha Swart** • MSc (Cum Laude) Zoology, • BSc (Hons) Biodiversity and Ecology, Stellenbosch University • BSc Biodiversity and Ecology, Stellenbosch University **Registrations** • EAPASA Reg EAP: 2021/3298 • SACNASP Pr.Sci.Nat. Reg. no.: 155305 (Environmental Science; Zoological Science) • IAIAsa Reg. no. 7398. **Michael Armitage (Cand. EAP)** • MSc Environmental and Geographical Science (EGS), University of Cape Town (Distinction) • BSc (Hons) EGS, University of Cape Town (Distinction) • BSc EGS and Archaeology, University of Cape Town **Registrations** • EAPASA: Cand. EAP: 2024/7978 • IAIAsa Reg. no. 7619. **Steve September (Cand. EAP)** • MCom Public and Development Management, Stellenbosch University • BCom (Hons) Public and Development Management, Stellenbosch University • BA Development and Environmental Studies, Stellenbosch University **Registrations** • EAPASA: Cand. EAP: 2023/7868		

	• IAIAsa Reg. no. 8136	
EAP registration no:	Cheruscha Swart – Reg EAP: 2021/3298 Michael Armitage – Cand. EAP: 2024/7978 Steve September – Cand. EAP: 2023/7868	
Duplicate this section where there is more than one landowner Name of landowner:	Same as applicant	
Name of contact person for landowner (if other):		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )
Name of Person in control of the land:	Same as applicant	
Name of contact person for person in control of the land:		
Postal address:		
		Postal code:
Telephone:	( )	Cell:
E-mail:		Fax: ( )

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	City of Cape Town	
Contact person:	Ms. Maurietta Stewart	
Postal address:	Metro Office, 44 Wale Street, 8th Floor	
	Cape Town	Postal code: 8001
Telephone	(021) 400 6519	Cell: N/A
E-mail:	Maurietta.Stewart@capetown.gov.za	Fax: N/A

SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INLCUDED IN THE APPLICATION FORM

Is the proposed development (please tick):	**New**	**X**	~~Expansion~~	
Is the proposed site(s) a brownfield of greenfield site? Please explain.				

The proposed site is classified as a brownfield site.

The V&A Waterfront is a highly transformed and established urban area characterised by a mix of commercial, residential, industrial, and tourism-related developments. Additional nearby land uses include an operational helipad, desalination building and the Table Bay Hotel, while the site is bordered to the north by a dolosse revetment. Breakwater Street forms the southern boundary of the site, providing well-established road access. Consequently, the site is well-integrated into the surrounding environment.

As the site is part of a developed urban area, it benefits from existing infrastructure, including roads, streetlights, stormwater systems, pedestrian walkways, and landscaped areas. A significant portion of the V&A Waterfront is situated on reclaimed land, created through the artificial infilling of material such as rubble and sand. This reclamation was crucial to the city's development, enabling the expansion of the V&A Waterfront and the creation of the mixed-use area it is today. As the purpose of this reclaimed land has always been for development, construction activities are common in the area, as is evidenced by the construction of previously authorised developments on adjacent sites (Figure 2).

The proposed development will therefore take place entirely on reclaimed land and, for this reason, the site has an underlying substrate comprising compacted fill material, likely consisting of sand, sediment, rubble, and gravel. This is overlain by concrete that supports harbour and breakwater infrastructure, as well as associated developments. As a result, the site is inherently artificial and does not comprise natural habitat.

The site earmarked for redevelopment was previously used as overflow parking but no longer functions as such due to ongoing construction in the area. It is currently used for storage of construction materials, and as a site camp and parking area for workers associated with adjacent developments. Figure 3 provides a panoramic view of the site from west (Parcel O) to east (Parcel P), with Atlantic Park and Parcels a1 and a2 visible in the background, identifiable by the row of palm trees.

Parcel O currently functions as a roadway and parking area, with portions also used for the temporary storage of containers and construction materials (Figure 4; Figure 5). Parcel P is largely sectioned off and used for container storage, construction materials, as well as a site camp and parking area for construction workers (Figure 6).

Atlantic Park and the adjacent Parcels a1 and a2 comprise sidewalks, roads, small patches of grass, palm trees, and landscaped traffic islands with shrubs and trees. Parts of these areas are currently sectioned off due to construction on adjacent parcels (Figure 7).

The narrow strip on the seaward side of the parcels (the Promenade), located north of the proposed Atlantic Park, is primarily used as a pedestrian walkway. It is proposed to be widened to approximately nine metres to improve public amenity.

Figure 2. Construction of another development occurring south of the proposed site. Parcel P is located to the right of the construction area (not fully visible), while Parcels O and a1 and a2 are visible in the distance near the grassed area and palm trees.

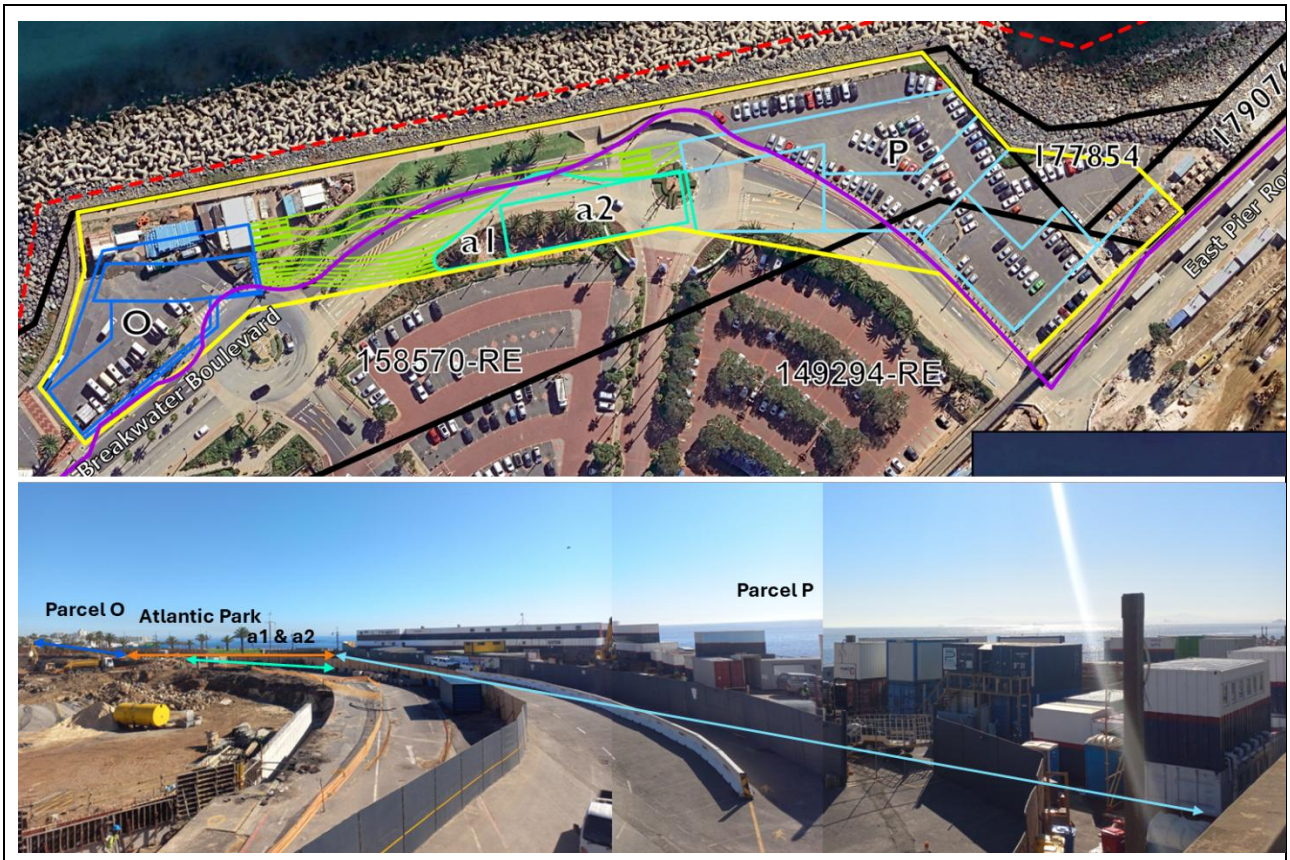


Figure 3. Panoramic photograph of the proposed development site, taken from a footbridge on the eastern side facing west. Parcel O is visible on the left and Parcel P on the right, with Atlantic Park and Parcels A1 and A2 in the background on the left near the palm trees.

Figure 4. Parcel O, currently functioning as a roadway and parking area. It is also used for temporary storage of construction materials.

Figure 5. Containers and construction material temporarily present in the area, partially overlapping with and situated in front of proposed Parcel O.

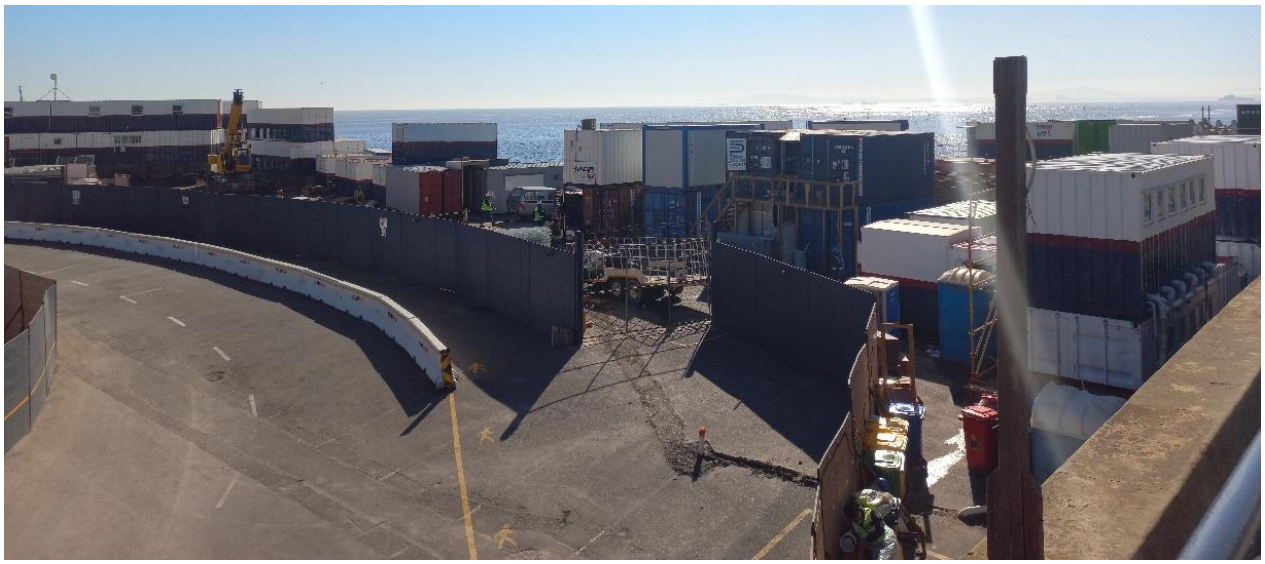


Figure 6. Closer view of Parcel P, currently enclosed and temporarily used for container storage, construction materials, a site camp, and parking for construction workers

Figure 7. Atlantic Park and the adjacent Parcels a1 & a2, with the figure indicating the sidewalks, roads, small patches of grass, palm trees, and landscaped traffic islands with shrubs/ trees.

In conclusion, the site cannot be considered greenfield, as it is located within a previously developed and highly urbanised precinct. It predominantly comprises hardstanding surfaces such as concrete and tar, along with existing infrastructure including roads, parking areas, and a pedestrian promenade, as well as landscaped elements such as artificially established lawns and planted palm trees. No natural or undisturbed habitats are present.

The site is also situated on reclaimed land that was artificially created through historical infilling and therefore does not represent a naturally occurring or undeveloped landscape. It forms part of the established V&A Waterfront precinct, which is fully developed and integrated into the surrounding urban environment. As such, no undeveloped (greenfield) land will be affected by the proposed development.

For linear activities or developments				
3.1.	~~Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:~~			
N/A				
3.2.	~~Development footprint of the proposed development for all alternatives.~~	N/A		
N/A				
3.3.	~~Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.~~			
N/A				
3.4.	~~Indicate how access to the proposed routes will be obtained for all alternatives.~~			
N/A				
3.5.	~~SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives~~	N/A		
3.6.	~~**Starting point co-ordinates for all alternatives**~~			
	~~Latitude (S)~~	N/A	N/A	N/A
	~~Longitude (E)~~	N/A	N/A	N/A
	~~**Middle-point co-ordinates for all alternatives**~~			
	~~Latitude (S)~~	N/A	N/A	N/A

	~~Longitude (E)~~	N/A	N/A	N/A
	~~End point co-ordinates for all alternatives~~			
	~~Latitude (S)~~	N/A	N/A	N/A
	~~Longitude (E)~~	N/A	N/A	N/A
~~Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.~~				
Other developments				

		Property	Cadastral size	Approximate extent to be utilised
1.1	Property size(s) of all proposed site(s):	158570 RE	29 338 m^2	900 m^2
		149294 RE :	854 442 m^2	10 000 m^2
		177854	1 095 m^2	420 m^2
		179076	4125 m^2	90 m^2
1.2	Developed footprint of the existing facility and associated infrastructure (if applicable):	N/A		
1.3	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:	Development Footprint for preferred alternative (extent of entire site): 12,700 m^2 or 1,27ha.		
1.4	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities)….			

1.4.1 Project Description

The project involves the redevelopment of the site (portions of Erven 158570 RE, 149294 RE, 177854 and 179076) into a mixed-use precinct. It will comprise three primary development parcels, namely Parcels P, O, and a1 &a2, as well as the expansion of the existing promenade and the creation of a new public open space, Atlantic Park (Figure 1 and Figure 8). The proposal also includes associated infrastructure required to support the development, where and if applicable. The development will have a total development footprint of approximately 12 700 m^2 and a maximum building height of 32 m above Existing Ground Level (EGL) for Parcel O (the tallest proposed building parcel).

Key development parameters, including building dimensions and footprints, are summarised in Table 1 and Table 2.

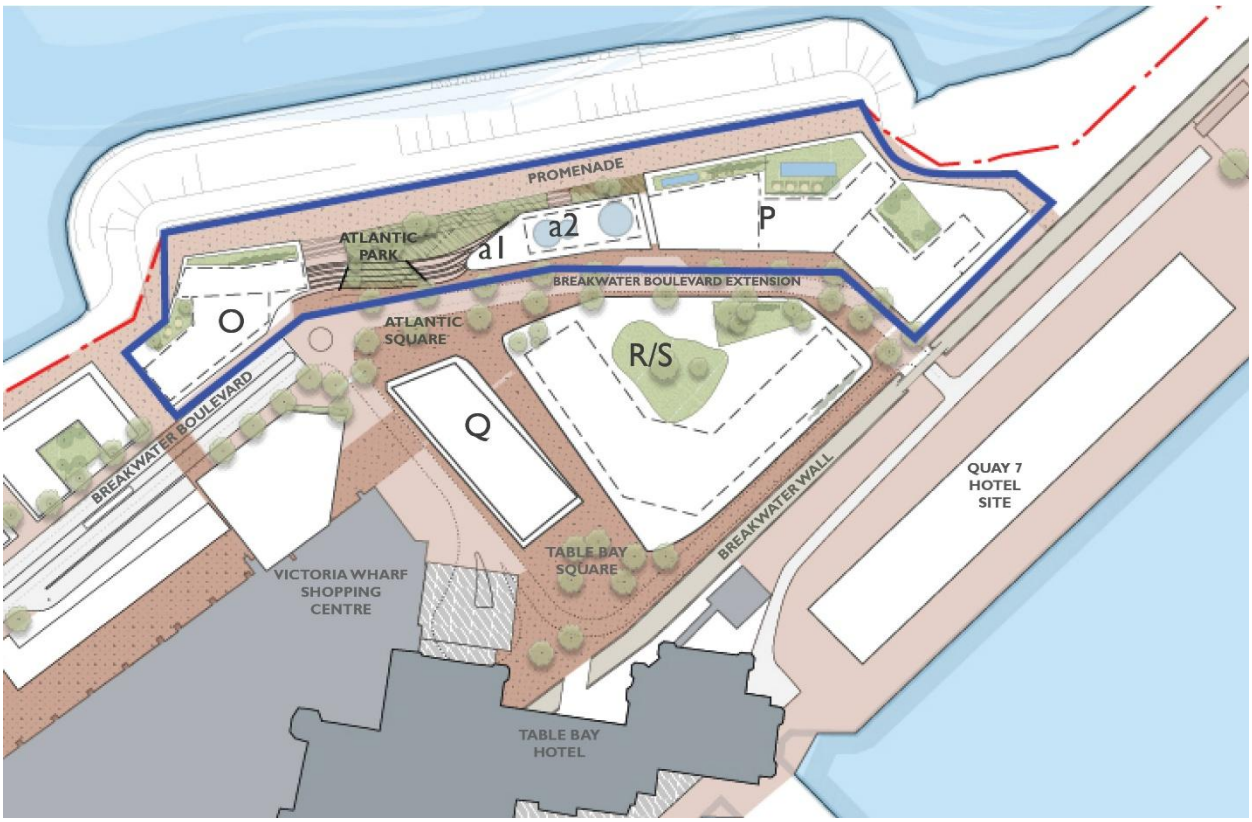


Figure 8. Proposed development layout and design for this project. This phase includes Block P, O and a1 & a2, Atlantic Park and the Promenade.

Table 1. Building dimensions and proposed land-use for Blocks P, O, a1 and a2.

Building Block	Max Height from Existing Ground Level	Building Footprint (m^2)	Gross Building Area (Gba) /Block (m^2)	GLA (m^2)	Proposed Land Use
Block P	+21m	4200	14 270	11 600	Mixed Use: Primarily Hotel/ Residential
a1 &a2	a1—+10m a2 —+17 m	1200	4 200	3 400	Mixed Use: Primarily Cultural
Block O	+32m	1750	10 000	8 600	Mixed Use: Primarily Residential /Hotel

Table 2. Erf number, cadastral size and anticipated development footprint.

Property	Cadastral size	Approximate extent (footprint) to be utilised
158570 RE	29 338 m^2	900 m^2
149294 RE	854 442 m^2	10 000 m^2
177854	1 095 m^2	420 m^2
179076	4125 m^2	90 m^2

Parcel O: Primarily Residential/Hotel (100 units)

Parcel O is intended for residential and / or hotel development. The land parcel is situated in a prominent, sea and north- facing location, alongside the proposed Atlantic Park. The building's proximity to the promenade will allow for access to public amenities and Waterfront attractions.

Parcel P: Primarily Hotel

Parcel P is planned as a hotel, with approximately 60–80 rooms. The site is located at the end of the existing seawater revetment and will be adjacent to the proposed Atlantic Park. The hotel will enjoy north aspect views over the Atlantic and is in walking proximity of a range of Waterfront facilities and services. It is intended that the ground floor of the hotel will accommodate a restaurant attraction or similar land use.

Parcel a1 & a2: Mixed Use (Primarily Cultural)

Parcels a1 &a2 are relatively small, and are proposed to accommodate a mixed-use development, which is likely to be primarily cultural, and could house specialist and educational facilities. The upper levels of the a2 portion could include restaurant, hotel, or residential facilities.

Atlantic Park: Open Space/Park

The park is proposed at a key junction between the Promenade end, Breakwater Boulevard, Victoria Wharf Shopping Centre and the pedestrian link between Table Bay Square, as well as the proposed Atlantic Park. The open space, at the level of the promenade, offers views of the ocean and mountain to the south, and of the broader Granger Bay area. This is planned to be an accessible space for the public to enjoy and complements the surrounding V&A buildings in the precinct. The Promenade will also be widened.

No alternative site was evaluated, as the proposed development is uniquely tailored to the specific, location and leverages the existing infrastructure to minimise the need for additional development.

1.4.2 Municipal Zoning

The site is zoned as Mixed Use 3 (MU3) in terms of the City of Cape Town's Municipal Planning Bylaw (2025 as amended). This zoning allows for primary uses, such as the uses that could occur on the site, i.e. Business premises, flats, hotel, institution, place of instruction, place of assembly, place of entertainment, conference facility and private road. Other primary uses permitted in this zoning are: industry, dwelling house, second dwelling, boarding house, place of worship, hospital, authority use, utility service, rooftop base telecommunication station, transport use, multiple parking garage, open space, chancery, electric vehicle charging stations, micro wind turbine, structure mounted energy system and filming.

A Site Development Plan (SDP) approval will be required from the CoCT.

1.4.3 SERVICES

General Pipeline Infrastructure

The proposed development will likely utilise existing approved bulk development rights, and therefore no further CoCT service infrastructure is required to meet the demands of the proposed development. Existing pipeline infrastructure is located within the Breakwater Street, adjacent to the proposed site. A City of Cape Town Capacity Letter will be submitted as an appendix to the Final BAR submission.

Solid waste

The proposed development will produce typical construction-related waste, during the construction/ development phase. While the type and quantity of the waste cannot be reported on at present, these are not expected to exceed thresholds for licensing.

The type of waste to be produced during the operational phase will be typical of residential, commercial, and retail land uses, however volumes cannot be reported on at present. No hazardous waste production is anticipated, and volumes cannot be reported on at present.

Wastewater/ Sewage

Effluent of approximately 44 m^3/day will be produced from the development and will be typical of effluent produced from residential and commercial land uses during operation. The effluent will be conveyed through existing bulk sewer infrastructure to the Green Point Marine Outfall Pipeline.

Water

The proposed development will require water during both the construction and operational phases, with non-potable water being utilised during construction, and potable (drinking quality) water will be utilised during the operational phase. Once operational, the development will requirement for 39m^3 /day of potable water, which will be drawn from the municipal water supply, and supplemented by the V&AW licensed desalination plant as required. This is in alignment with the V&AWs long-term objective to reduce reliance on the City of Cape Town for their water supply. This will be implemented in a phased manner, with the objective of eventually relying on the City's mains connections to the V&AW only for critical situations only. In this regard, the V&AWs Desalination Plant (located outside the application site area on V&AW owned property) has been designed to meet current water demands, and to cater for future growth of the property, including the application site. The desalination plant has a production capacity of 3,300 m^3/d and will be upgradable, with minimal disruption, to 5,000 m^3/d in future.

Electricity

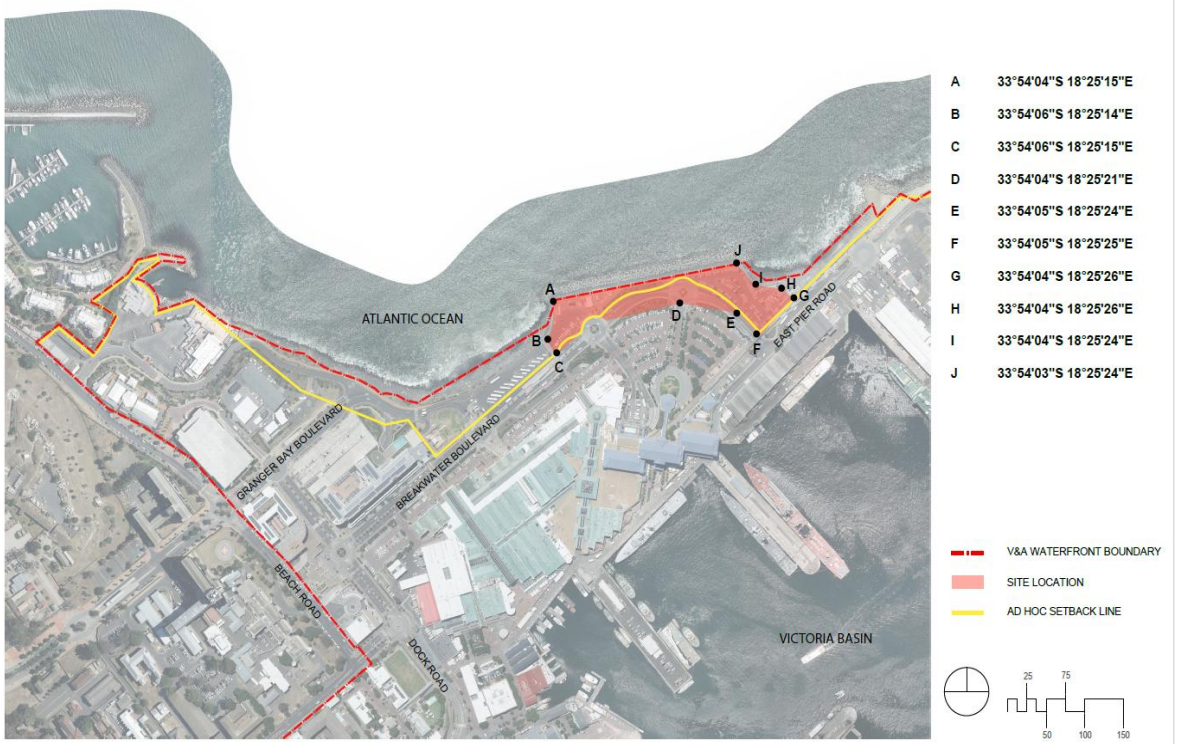
The CoCT is the local electrical supply authority. The demand for the development is approximately 2MVA. The V&AW has engaged with the City's Electricity Dept., who confirmed that there is sufficient capacity within the City's network to service the anticipated demand for the precinct (a letter of confirmation will be submitted as an appendix with the final BAR) indicating the required infrastructure requirements.

4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.

Access to the proposed development will be obtained via Breakwater Boulevard, which connects directly to the site via Breakwater Street and supports vehicle and pedestrian access. This road forms part of a well-established road network within the V&A Waterfront.

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:	
	158570-RE	C01600000015857000000
	149294-RE	C01600000014929400000
	177854	C01600000017785400000
	179076	C01600000017907600000

4.7. Coordinates of the proposed site(s) for all alternatives:



A	Latitude (S)	33°	54'	04"
	Longitude (E)	18°	25'	15"
B	Latitude (S)	33°	54'	06"
	Longitude (E)	18°	25'	14"
C	Latitude (S)	33°	54'	06"
	Longitude (E)	18°	25'	15"
D	Latitude (S)	33°	54'	04"
	Longitude (E)	18°	25'	21"
E	Latitude (S)	33°	54'	05"
	Longitude (E)	18°	25'	24"
F	Latitude (S)	33°	54'	05"
	Longitude (E)	18°	25'	25"
G	Latitude (S)	33°	54'	04"
	Longitude (E)	18°	25'	26"
H	Latitude (S)	33°	54'	04"
	Longitude (E)	18°	25'	26"
I	Latitude (S)	33°	54'	04"
	Longitude (E)	18°	25'	24"
J	Latitude (S)	33°	54'	03"
	Longitude (E)	18°	25'	24"

SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

1 EXEMPTION APPLIED FOR IN TERMS OF THE NEMA AND THE NEMA EIA REGULATIONS

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18.	~~YES~~	**NO**

2 IS THE FOLLOWING LEGISLATION APPLICABLE TO THE PROPOSED ACTIVITY OR DEVELOPMENT.

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant CA as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	**~~YES~~**	NO
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	**YES**	~~NO~~
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	~~YES~~	**NO**
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	~~YES~~	**NO**
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	~~YES~~	**NO**
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	~~YES~~	**NO**
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	~~YES~~	**NO**
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant CA as Appendix E5.	~~YES~~	**NO**

3 OTHER LEGISLATION: NATIONAL, PROVINCIAL AND MUNICIPAL LEGISLATION

List any other legislation that is applicable to the proposed activity or development.

3.1 NATIONAL LEGISLATION

3.1.1 NATIONAL ENVIRONMENTAL MANAGEMENT: INTEGRATED COASTAL MANAGEMENT ACT (ACT 4 OF 2008)

The National Environmental Management: Integrated Coastal Management Act (Act 24 of 2008; NEM:ICMA) provides a legal framework for the management, use, and protection of South Africa's coastal environment. It aims to ensure the sustainable development of coastal areas through coordinated governance, responsible use of coastal resources, and the protection of ecological integrity. The Act also promotes cooperation between organs of state and stakeholders, and supports transparent and participatory decision-making. The Act defines a range of coastal management areas, including Coastal Public Property (CPP), the Coastal Protection Zone (CPZ), Coastal Access Land, Coastal Waters, Coastal Protected Areas, Special Management Areas (SMAs), and Coastal Setback Lines. These delineations are used to guide planning and decision-making in coastal environments.

The proposed development site was assessed against the relevant ICMA spatial delineations during the early stages of the assessment process. The site does not fall within CPP, as the V&A Waterfront land was historically alienated in terms of the Seashore Act and is therefore excluded from CPP provisions. In addition, the site is excluded from the CPZ and coastal management line as defined in the Western Cape Provincial Gazette (O.N. 25 of 2021), which excludes the Port of

Cape Town and the V&A Waterfront precinct. This exclusion is also reflected in the City of Cape Town's Spatial Development Framework and associated spatial datasets. However, the site is located within approximately 100 m of the high-water mark and is therefore situated within a coastal environment. While the formal ICMA spatial control areas (such as CPP and the CPZ) do not apply to the site, and hence no authorisation in terms of NEM: ICMA is required, the principles of ICMA remain relevant to inform responsible planning and environmental management. This includes consideration of coastal resilience, appropriate interface with the coastal edge, and the protection of adjacent marine and coastal systems. Accordingly, the development has been informed by ICMA principles to ensure that potential coastal-related risks are appropriately managed and that the interface between the built environment and the coastal zone is planned in a sustainable and environmentally responsible manner.

3.1.2 Spatial Planning and Land Use Management Act (Act 16 Of 2013)

The purpose of the Spatial Planning and Land Use Management Act (Act 16 of 2023; SPLUMA) establishes a framework for managing planning permissions and approvals, setting guidelines for new developments, and defining legal land uses in South Africa. It functions as a foundational law, outlining general principles for provincial laws that will manage spatial planning within the country. Additionally, SPLUMA clarifies how planning law interacts with other legal regulations and policies. Section 7 of the Spatial Planning and Land Use Management Act (No. 16 of 2013) (SPLUMA) and section 59 of the Land Use Planning Act (No. 3 of 2014) (LUPA) contain development principles that apply to spatial planning, land development and land use management, namely: spatial justice, spatial sustainability, efficiency, spatial resilience, and good administration.. Spatial planning in the Western Cape is managed in terms of the Western Cape Land Use Planning Act (LUPA, 2014). Management in Cape Town, within which the development will take place, falls under the CoCTs Municipal Planning By-law (2015). This By-law further contains the CoCTs "Development Management Scheme" (DMS), which prescribes the various forms of land zoning to be used within the metro, and indicates what land uses are appropriate within.

The approved zoning for the site is Mixed Use 3 (MU3) in terms of the CoCT Development Management Scheme which allows for the relevant land uses proposed.

3.1.3 Water Services Act (Act 108 of 1997)

This Act regulates the provision of water services, including water supply and sanitation, and establishes the framework for the rights and duties of water services authorities and providers.

All necessary municipal services are available to the site, and confirmation of capacity will be obtained from the City of Cape Town through a formal Services Capacity Letter, which will be submitted with the Final BAR. The development will also align with municipal infrastructure capacity and water demand management principles.

3.1.4 National Heritage Resources Act (Act 25 of 1999)

This Act provides the legislative framework for the identification, protection, and management of South Africa's heritage resources, including cultural, archaeological, palaeontological, and historical resources, and establishes the roles of the South African Heritage Resources Agency (SAHRA) and provincial authorities such as Heritage Western Cape (HWC).

The entire V&A Waterfront precinct was the subject of an HIA in 2024 (HWC23060705SJ0609) as part of an application for rezoning to Mixed Use 3 (MU3). The HIA was approved, however, Parcels O, P and a1/a2, were among those that the HIA recommended should be approved in principle, but

that still required further assessment and endorsement from HWC. Additional information has now been provided for these three parcels, and the assessment largely demonstrates an adequately low degree of impact and appropriate response to the range of heritage indicators. Positive benefits can be expected.

3.1.5 THE CLIMATE CHANGE ACT (ACT 22 OF 2024)

This Act provides the national framework for responding to climate change and promoting a transition to a low-carbon, climate-resilient economy.

The proposed development aligns with the Act through the incorporation of sustainable design principles, consideration of climate risks, and integration of resource-efficient infrastructure in line with broader national climate objectives.

3.2 PROVINCIAL LEGISLATION

3.2.1 WESTERN CAPE LAND USE PLANNING ACT (ACT 3 OF 2014)

This Act governs spatial planning and land use management in the province. It guides the drafting of provincial and municipal Spatial Development Frameworks (SDFs) and ensures that these align with national priorities and SPLUMA. It ensures that infrastructure, heritage, agriculture, tourism, ecologically important areas, biodiversity, soil conservation, pollution control, and climate change adaptation considerations are incorporated into planning. It also guides applications such as rezoning, subdivision, and consent use.

The proposed development aligns with this Act as it falls within an established urban area and is zoned Mixed Use 3 (MU3) in terms of the City of Cape Town's Municipal Planning By-law. The development is subject to applicable land use planning processes and approvals, and has been informed by relevant spatial planning frameworks to ensure appropriate land use, integration with surrounding uses, and consideration of environmental and heritage constraints.

3.3 MUNICIPAL LEGISLATION

3.3.1 CITY OF CAPE TOWN MUNICIPAL PLANNING BY-LAW (2015)

The City of Cape Town Municipal Planning By-Law (2015) regulates the development, management, and use of land and buildings located within the municipal area. These regulations are prescribed within the DMS, which determines what activities are permitted per property according to its zoning (e.g. residential, agriculture, community, etc.) and sets specific development control measures such as floor area, building height, coverage, building lines, parking requirements, and density. The scheme ensures that land use aligns with the CCT Municipal Spatial Development Framework (MSDF), and broader planning instruments, and promotes orderly development, spatial efficiency, and compatibility between neighbouring land uses. Furthermore, the scheme provides a legal basis for regulating and evaluating planning applications, including departures, rezoning, and consent use applications, to balance economic growth with environmental sustainability and community well-being.

The approved zoning for the site is Mixed Use 3 (MU3) in terms of the CoCT Development Management Scheme which allows for the relevant land uses proposed.

3.3.2 City of Cape Town Municipality: Integrated Waste Management By-Law (2009)

The CCT Integrated Waste Management By-law aligns with NEM:WA and the National Waste Management Strategy, to promote sustainable waste management practices. It regulates waste generation, storage, collection, transportation, recycling, treatment and disposal.

The proposed development will generate typical construction-related waste during the construction phase and typical residential, commercial, and retail waste during operation. While waste volumes cannot currently be quantified, they are not expected to exceed licensing thresholds, and no hazardous waste generation is anticipated. Waste generated during both construction and operation must therefore be managed in accordance with this by-law, particularly given the site's location adjacent to a sensitive marine environment and within a densely populated urban area. A Waste Minimisation Plan has been drafted and will be implemented through the EMPr. The plan includes measures to reduce, reuse, and recycle waste, as well as provisions for appropriate waste handling, storage, and disposal in accordance with applicable legislation and best practice.

3.3.3 The City of Cape Town Stormwater Management By-law (2019)

This law regulates the management, control, and discharge of stormwater within the municipal area, with the aim of protecting public infrastructure, private property, and receiving environments from pollution, erosion, and flooding. It requires that stormwater from developed areas be appropriately managed to prevent contamination and to ensure that discharge into the natural or marine environment is controlled and compliant with municipal standards.

The EMPr will include measures to control runoff quantity and quality, prevent the release of sediment and pollutants during both construction and operation, and ensure that any discharge to the surrounding environment, including the adjacent marine area, is appropriately managed in accordance with municipal requirements and best practice.

3.3.4 Wastewater and Industrial Effluent By-law (2013)

The By-law regulates the discharge of wastewater and effluent into the municipal sewer system and ensures that such discharges comply with defined quality standards to protect public infrastructure and the receiving environment.

Effluent of approximately 44 m^3/day will be produced from the development and will be typical of effluent produced from residential and commercial land uses during operation. The effluent will be conveyed through existing bulk sewer infrastructure to the Green Point Marine Outfall Pipeline. The development will therefore align with this By-law through connection to the existing infrastructure and compliance with applicable discharge requirements, ensuring that all wastewater generated during construction and operation is appropriately managed and does not exceed permissible limits.

4 POLICIES (INCLUDES POLICES, PLANS AND FRAMEWORKS)

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.	
South African National Development Plan (SANDP)	The SANDP 2030 aims to eliminate poverty and reduce inequality by the year 2030. It envisions a country where all citizens have access to opportunities that enable them to lead dignified and productive lives. The plan sets out a comprehensive strategy to grow the economy, improve infrastructure, expand employment, and enhance the quality of education and healthcare. By addressing the root causes of poverty and inequality, the NDP seeks to create a more inclusive and equitable society. To achieve its goals, the NDP emphasizes building a capable and developmental state that works effectively with citizens and all sectors of society. It promotes active citizenry, social cohesion, and accountability in government institutions. The plan also outlines key reforms in public service delivery, economic policy, and governance to support long-term development. Ultimately, the NDP serves as a roadmap for transforming South Africa into a nation where everyone can access opportunities and improve their quality of life. The NDP focuses on creating a conducive environment for public and private investments to drive job creation and increase income levels, aiming to create additional jobs by 2030, particularly for young and low-skilled South Africans. The NDP further seeks to eliminate poverty and reduce inequality while boosting economic growth. **This development therefore aligns with the NDP's priorities by promoting economic growth, enhancing investment, and increasing job opportunities (at a variety of skill and income levels).**
Western Cape Provincial Strategic Plan (WCPSP) (2025-2030)	"The WCPSP outlines the Western Cape Government's (WCGs) strategic goals and priorities for the period 2025 to 2030. Developed every five years following provincial elections, the WCPSP outlines the overarching strategic direction for the provincial government over the medium term." The WCPSP is described as fundamentally "resident-centric" plan, which focusses on "enabling residents to access economic opportunities and live the lives they value". This is further defined as follows: "The strategic anchor of the PSP is shared, resident-centric impact that cuts across department and portfolio plans. This shared impact defines our seamless response to the evolving needs and opportunities of individuals at different stages of their lives. It emphasises residents' agency to take advantage of opportunities and progress. *For residents, this means responsive government services that are more relevant, effective, and aligned with their life circumstances over time"*. This is further clarified in

	the stated apex priority of the development, which is "helping businesses grow and create jobs – equipping you to get those jobs." **The proposed development should therefore support the WCPSP by contributing to key government priorities, such as economic transformation, job creation, and spatial integration. Through the provision of mixed-use spaces, including residential, tourism retail, and public amenities the project should stimulate investment, support inclusive urban growth, and enhance access to quality infrastructure. Its location within a key urban node should further align with the goal of building a capable and sustainable city region that offers opportunities for employment, improved mobility, and social cohesion. In summation, this development is predicted to closely align with, and support, the apex priority of the WCPSP, quoted above.**
City of Cape Town Integrated Coastal Management Policy (2014)	The Integrated Coastal Management Policy and subsequent Coastal Bylaw (2020) recognises the coastline as a shared public asset that supports important economic, social, and environmental opportunities for Cape Town. It also emphasises equitable public access, the sustainable management of coastal resources, and the need to protect the coastline from the risks associated with climate change, erosion, and storm surges. The coastal zone as defined in ICMA does not include the V&AW. The City's coastal jurisdiction was defined in the MSDF (2023). In this document, the Coastal Edge/Coastal Management Line (CE/CML) was delineated based on a multiple informants. One such informant was the presence of development rights. Properties containing such rights were excluded (fall landward) of the CE/ CML. Thus, the CE /CML does not impact existing land use and/or development rights in Cape Town. **The entire V&AW and Cape Town Port fall outside of the Coastal Urban Edge/coastal management line (CML). Therefore, although this policy does not strictly apply to this area, nevertheless the proposed development aligns with the objectives contained in the policy by providing new public coastal amenities, including a public walkway, a landscaped promenade, pedestrian paths, and open areas. In addition, the project contributes to the social, recreational, economic, and place-making value of the coastline within a highly significant urban coastal setting. Furthermore, the development is not anticipated to impact the coastal or marine environment.**
City of Cape Town Management of Urban Stormwater Impacts Policy (2009)	The City of Cape Town's 2009 Management of Urban Stormwater Impacts Policy provides strategic direction for minimising the impacts of urban development on stormwater systems and receiving environments, including the prevention of pollution and the attenuation of runoff impacts. **This policy will inform the development of a Stormwater Management Plan for the site in the future planning stage, with**

	the objective of improving stormwater quality and managing the volume and rate of runoff. No upgrades to the City's stormwater network are required, as the V&A Waterfront stormwater system is self-contained and drains directly to the ocean. **The proposed development will align with this policy through the implementation of appropriate stormwater management measures to control runoff quality and quantity, prevent pollution during construction and operation, and ensure that discharge to the marine environment is appropriately managed in accordance with applicable requirements and best practice.**
Urban Design Policy (2013)	The Urban Design Policy (2013) provides guidance for creating high-quality urban environments that are functional, inclusive, context-responsive, and environmentally sensitive, with emphasis on public realm integration and place-making. **The principles of this Policy have been taken into consideration in the design of the proposed development,**
City of Cape Town Integrated Development Plan (CoCT IDP) (2022-2027)	The CoCT IDP 2022–2027 is the municipality's principal strategic planning instrument, guiding municipal planning and development decisions. The IDP is underpinned by core principles of sustainability, resilience, and environmental transformation through transit-oriented development, and seeks to advance Cape Town's vision of an opportunity city that enables business growth and job creation. Its strategic priorities include faster economic growth, improved public spaces and environmental quality, greater resilience to climate change and disaster events, and a more spatially integrated and inclusive city. **The proposed development aligns with these objectives by making use of a well-serviced urban site within the V&A Waterfront, supporting economic activity, efficient land use, and integrated urban development in an existing mixed-use precinct.**
Western Cape Provincial Spatial Development Framework (WCPSDF) (2014) **(Provincial Spatial Planning Context)**	The WCSDF is a strategic planning instrument designed to guide land use and spatial development across the province. Its primary objective is to facilitate sustainable, equitable, and efficient growth by aligning development initiatives with environmental, social, and economic priorities. The framework articulates a long-term vision for land and resource management, supporting the coordinated delivery of infrastructure, the protection of critical natural assets, and the promotion of spatially balanced urban and rural development. It aims to reduce inequality and enhance overall quality of life through informed, strategic, spatial planning. The WCSDF advocates for compact, connected, and resilient settlements that enable inclusive economic opportunities and promote environmental sustainability. It prioritizes development in areas with existing infrastructure and high growth potential, while discouraging urban sprawl and environmentally damaging practices. In addition, it supports rural development, climate

	change resilience, and the preservation of biodiversity and cultural heritage. As a guiding tool, the WCSDF informs land-use decisions made by municipalities and government entities to foster integrated and sustainable development throughout the Western Cape. **The proposed development aligns with the WCSDF as it is located within an existing, high-potential urban area that is already serviced by infrastructure. The development supports spatial efficiency and economic development through the use of existing infrastructure and the provision of residential, commercial, and recreational opportunities within the urban area.** Note that a new A new PSDF is being prepared under the Western Cape LUPA, with a notice of intention published on 10 June 2024 (Provincial Gazette Extraordinary No. 8935, Provincial Notice 67/2024). The update process is still underway, and once adopted, it will replace the 2014 framework and require municipalities to realign their own SDFs. As of August 2026, the updated PSDF has not yet been finalised or released to the public.
City of Cape Town Spatial Development Framework (CoCT SDF) (2023) **(Metropolitan Spatial Planning Framework)**	The CoCT SDF forms part of the City's broader spatial planning framework and is aligned with the principles of the MSDF, the Western Cape Spatial Development Framework, and SPLUMA. It promotes efficient, inclusive, and sustainable urban growth, with a strong emphasis on spatial transformation, compact development, and the strengthening of established nodes and growth corridors. The framework also seeks to redress historic spatial inequalities by improving access to housing, economic opportunities, public transport, and basic services, while supporting development that contributes to a more resilient and spatially just city. The relevant local framework for the proposal is the Table Bay District Spatial Development Framework, under which the V&A Waterfront is identified as a strategically important urban node. **The proposed development aligns with this policy by supporting development within an already well-serviced metropolitan node, making use of existing bulk infrastructure, supporting walkability, and integrating tourism, retail, and accommodation within a compact precinct. It also contributes to public realm enhancement, place-making, and improved access along the waterfront, while remaining consistent with the City's broader objectives for sustainable urban growth and coastal resilience.**
Table Bay District Spatial Development Framework (Table Bay District Spatial Development	The Table Bay DSDF provides more detailed spatial and environmental guidance at a district scale, translating metropolitan spatial objectives into locally relevant development guidance. These frameworks consider environmental sensitivities, infrastructure capacity, and local spatial structure to inform appropriate development at a finer scale.

Framework (DSDF) (2023) **(District / Local Spatial and Environmental Context)**	This framework provides medium- to long-term guidance for spatial transformation and land-use planning within the Table Bay District and incorporates an Environmental Management Framework (EMF) to support sustainable development, economic growth, and resilience. The framework recognises the Table Bay Area as one of Cape Town's most significant economic and tourism districts, including the Central Business District (CBD), the V&A Waterfront, and major transport and visitor destinations. It promotes development within existing urban nodes, particularly in areas with established infrastructure and strong economic activity, while also seeking to enhance public space, walkability, and spatial integration. **The proposed development aligns with the Table Bay DSDF and the district EMF by supporting redevelopment within an existing, highly transformed urban node that is already serviced by infrastructure and characterised by strong economic and tourism activity. The development reinforces the mixed-use character of the V&A Waterfront through a compatible mix of residential, commercial, and public spaces. It further supports economic activity, while limiting pressure on sensitive or undeveloped areas. Potential coastal, heritage, and visual impacts can be appropriately managed through mitigation measures.**
City of Cape Town Coastal Management Programme (CMP) 2014 and the Western Cape Provincial Coastal Management Programme	The CoCT Coastal Management Programme (2014) provides a strategic framework for the sustainable use, protection, and development of the City's coastline, in accordance with the ICMA. It guides coastal decision-making by addressing issues such as coastal access, risk management, ecosystem protection, and climate change adaptation, while supporting appropriate economic and recreational development along the coast. The Western Cape Provincial CMP is a strategic framework mandated under the ICMA, which guides sustainable coastal management, conservation, and planning within the province. **The proposed development is consistent with the objectives of both CMPs as it supports sustainable economic development within an existing coastal urban node, thereby reducing pressure on undeveloped and environmentally sensitive areas. It also considers coastal risk and climate resilience in its planning approach, and contributes to improved and responsible public access to the coastal environment.** **Although located near the marine environment, the development has been designed and assessed to minimise potential impacts. The BA process has considered the interface with the coastal environment, including minor, short-term construction-related risks such as accidental spillage, sediment-laden runoff, or material loss entering the marine environment. These risks are considered insignificant and can be effectively managed through standard mitigation measures**

	and environmental controls in line with applicable legislation and best practice.
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 sets desired outcomes aligned with its vision to enhance, protect, and manage Cape Town's natural and cultural resources for long-term prosperity, while optimising economic opportunities and promoting access and social well-being. **The proposed development supports this vision through the incorporation of sustainable urban development principles, responsible resource use, and environmental management measures appropriate to a high-density coastal urban setting. It has also been designed to take environmental and heritage considerations into account through its siting, layout, and overall design response.** **The development further improves public access to the coastline and avoids undue proximity to the coastal edge, thereby limiting potential interaction with the coastal environment. In addition, resilience to dynamic coastal conditions, including sea level rise, has been considered in the broader planning and design approach.**
City of Cape Town Climate Change Strategy (2021) and Climate Change Action Plan (2021)	The Climate Change Strategy (2021) and Climate Change Action Plan (2021) provide the City's framework for climate change mitigation and adaptation, promoting low-carbon development, resource efficiency, and climate-resilient infrastructure. It recognises that climate change adaptation is essential to building urban resilience, particularly in light of rising sea levels and increasing coastal erosion. **The proposed development aligns with these frameworks through efficient building design, sustainable infrastructure planning, and consideration of climate-related risks in a coastal urban context, including sea-level rise and increased stormwater intensity.**

5 GUIDELINES

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.	
Please note that the BA process and associated specialist studies were primarily informed by and undertaken in accordance with applicable legislation, regulations, and gazetted protocols, which in several cases are more recent and take precedence over the guideline documents listed below. Notwithstanding this, the listed guidelines were also considered as supplementary supporting tools to inform and guide the assessment process where relevant.	
DEA&DP NEMA EIA Regulations Guideline & Information Document Series: Guideline on Public Participation July 2006.	The proposed development is subject to a BA process, which was conducted in accordance with the NEMA EIA Regulations, 2014 (as amended) and the associated public participation requirements. The public participation process is undertaken in terms of Chapter 6 of the Regulations and includes written notification to relevant national and provincial authorities, municipal environmental departments, the Ward Councillor, adjacent landowners, and other identified Interested and Affected Parties (I&APs). Notification is issued using the methods prescribed in the Regulations to inform stakeholders of the availability of the 1st Draft Pre-Application BAR and supporting documentation, and to provide an opportunity for comment within the prescribed 30-day public participation period. The Guideline on Public Participation was also consulted during this process.
DEA&DP NEMA EIA Regulations Guideline & Information Document Series — Guidelines on specialist input.	The proposed development is subject to specialist assessments in accordance with the NEMA EIA Regulations, 2014 (as amended), to inform the identification of potential impacts and the development of appropriate mitigation measures. These requirements were further guided by the DEA&DP framework for the involvement of specialist input in Environmental Impact Assessment processes. Guidelines considered include: • DEA&DP Guideline for Involving Visual and Aesthetic Specialists in EIA Processes (2005) • DEA&DP Guideline for Involving Economists in EIA Processes (2005) • DEA&DP Guideline for Involving Heritage Specialists in EIA Processes (2005)
DEA&DP NEMA EIA Regulations Guideline & Information Document Series Guideline on Alternatives July 2006.	Alternative layouts and designs were investigated in this BA Process.
DEA&DP Guideline for environmental decision-making by municipalities in the	The proposed development is subject to a public participation period in which the local municipality will be requested to comment on the proposed new

Western Cape.	land use. This is in line with the DEA&DP guideline on municipal input.
Guideline on Need and Desirability in Terms of the EIA Regulations, 2010	This guideline provides a framework for considering the broader planning and sustainability context of proposed developments, with particular emphasis on their alignment with spatial planning, as well as social, economic, and environmental considerations, including the need for development and its desirability in a specific location. The proposed development has been informed by this Guideline through consideration of its location within an established urban mixed-use node, its alignment with applicable planning frameworks, and its contribution to the ongoing economic functionality and diversification of the V&A Waterfront as a key urban economic and tourism precinct.

6 PROTOCOLS

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form
Specialist assessments are required to comply with the relevant theme-specific protocols published under the "*Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes*", as gazetted under Government Notice (GN) 1150 and GN 320 in terms of Sections 24(5)(a) and (h) and 44 of NEMA. Where no theme-specific protocol has been prescribed, assessments must comply with Appendix 6 of the 2014 EIA Regulations. No prescribed protocols apply to the Marine, Heritage, Visual, Archaeological, Traffic or Socio-Economic Assessments undertaken for the proposed development. These assessments have therefore been conducted in accordance with Appendix 6 of the 2014 EIA Regulations. The Civil Aviation Assessment will be conducted in accordance with the "*Protocol for the Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Civil Aviation Installations*", as gazetted in GN 320 of Government Gazette (GG) 43110 of 2020.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **BA Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
19A	*The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from* *(i) the seashore;* *(ii) the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or* *(iii) the sea;* *but excluding where such infilling, depositing, dredging, excavation, removal or moving:* *(f) will occur behind a development setback;* *(g) is for maintenance purposes undertaken in accordance with a maintenance management plan;* *(h) falls within the ambit of activity 21 in this Notice, in which case that activity applies;* *(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 will involve the infilling/ depositing of more than 5 m^3 of material within 100 m inland of the high water mark of the sea and, as most of Parcels O and P are situated in front of a development setback line, this activity will be triggered\. No exclusions are applicable
Activity No(s):	Provide the relevant **BA Activity(ies)** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A	N/A	N/A

Note:
- The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an EA, a new application for EA will have to be submitted.
- Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the CA.

List the applicable waste management listed activities in terms of the NEM:WA

Activity No(s):	Provide the relevant **BA Activity(ies)** as set out in **Category A**	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A	N/A	N/A

List the applicable listed activities in terms of the NEM:AQA

Activity No(s):	Provide the relevant **Listed Activity(ies)**	Describe the portion of the proposed development to which the applicable listed activity relates.
N/A	N/A	N/A

SECTION E: PLANNING CONTEXT, NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

The V&A Waterfront is proposing a mixed-use development within its Breakwater Precinct on Erven 158570 RE, 149294 RE, 177854 and 179076, located adjacent to the Port of Cape Town and V&A Waterfront Victoria Basin (Figure 9). The development will comprise three primary development parcels, namely Parcels P, O, and a1 & a2, as well as the upgrading of the existing promenade and the creation of a new public open space, Atlantic Park (Figure 10), with associated infrastructure and structures between these components. The proposed development has a total footprint of approximately 12 700 m^2 and includes a maximum building height of 32 m above EGL for Parcel O. Parcels O and P are proposed for mixed-use purposes (hotel and/or residential and associated uses), while Parcels a1 & a2 will accommodate a mixed-use proposal suitable for cultural and educational facilities. The upper levels of the a2 portion could include restaurant, hotel or residential facilities. Key development parameters, including building dimensions and footprints, are summarised in Table 1 and Table 2.

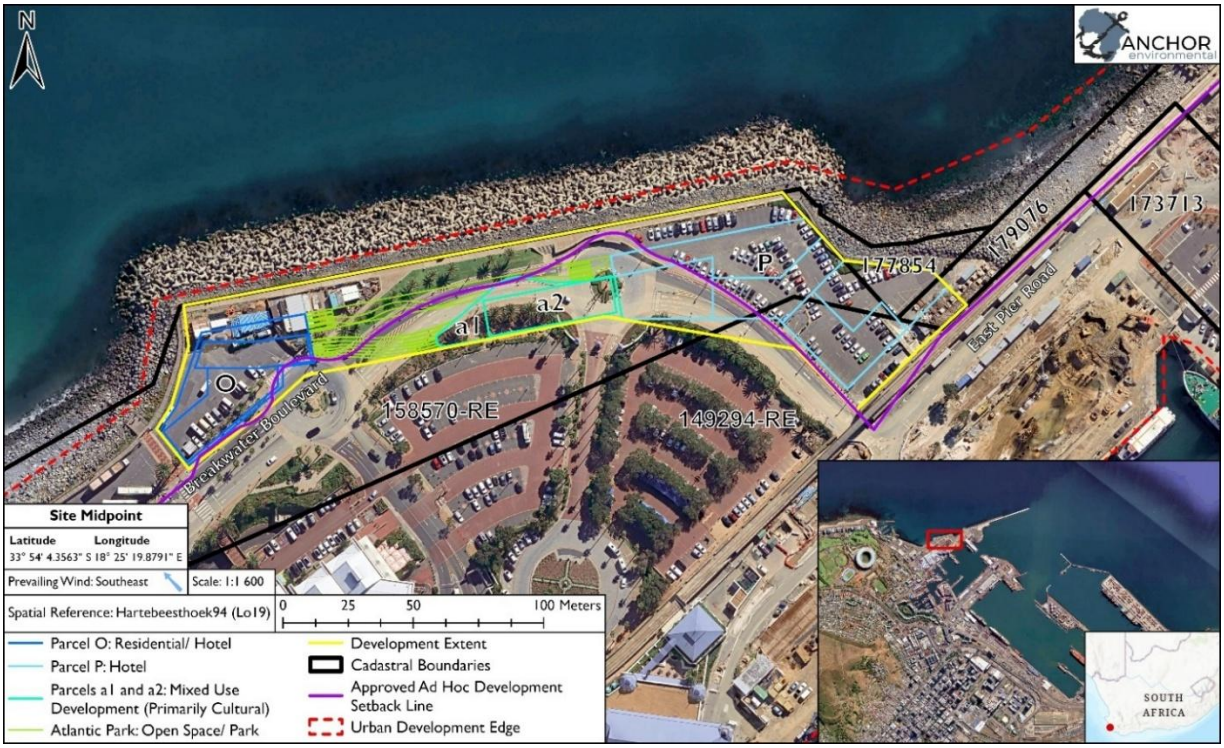


Figure 9. Location of the proposed mixed-use development on Erven 158570 RE, 149294 RE, 177854 and 179076 within the V&A Waterfront, Cape Town. The original layout and land use of the site are also visible, including existing infrastructure such as roads, parking areas, landscaped lawns with palm trees, and storage containers.

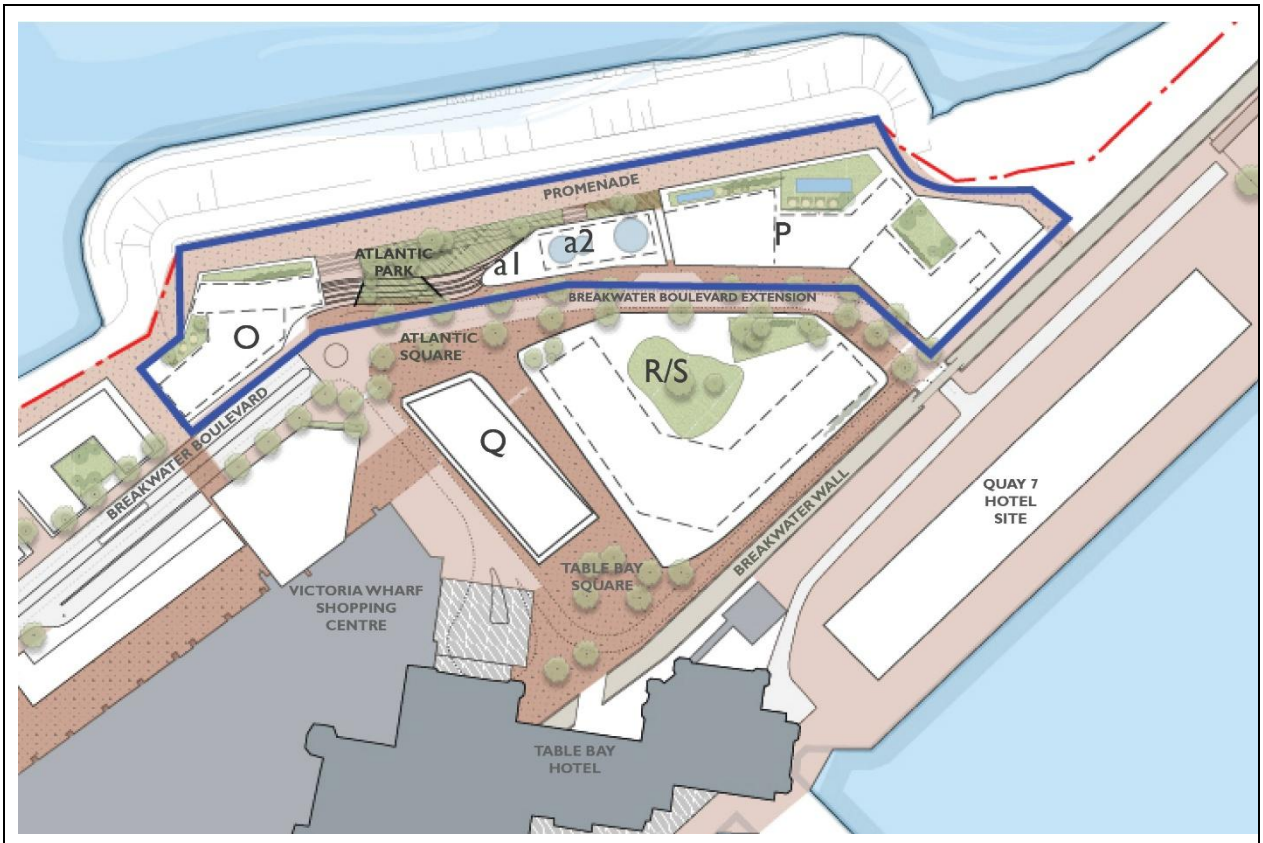


Figure 10. Proposed development layout and design for this project. This phase includes Block P, O and a1 & a2, Atlantic Park and the Promenade.

Please refer to Section B, for the detailed description of the preferred alternative.

2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.

The site is zoned as Mixed Use 3 (MU3) in terms of the City of Cape Town's Municipal Planning Bylaw (2025 as amended) which permits the proposed land uses. A further Site Development Plan (SDP) approval will be required as part of the Land Use Management approval process. All SDPs shall be in accordance with the provisions of Item 123 of the City of Cape Town's Development Management Scheme (DMS).

3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.

N/A

4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.

The Western Cape PSDF (2014 – 2019) was framed to take forward the National SDP agenda on a provincial level. The PSDF emphasises expanding opportunities in the provincial economy by directing investment into strategically located urban nodes with strong economic potential. In this context, the V&A Waterfront, identified as a major metropolitan destination, supports the PSDF's objective of diversifying and strengthening tourism, hospitality, and related urban economic activities within well-serviced, transformed areas. By promoting mixed-use development that enhances public accessibility, protects coastal and heritage assets, and delivers high-value economic activity, the proposed project aligns with the PSDF's broader aim of enabling sustainable, competitive, and inclusive growth in key urban centres. At a regional scale, the V&A can be considered as an economic node of interest. Within the Western Cape's Provincial Spatial

Development Framework (PSDF, 2014), the V&AW falls within the "Consolidate" logic for regional growth nodes, which prioritises consolidated investment in economically vibrant areas.

4.2	The Integrated Development Plan of the local municipality.

The City of Cape Town (CoCT) IDP serves as the metropolitan municipality's five-year strategic plan which guides the municipal budget, policy decision-making, and service-delivery priorities. The IDP promotes and prioritises direct investment into well-located established urban nodes, to expand inclusive economic growth—through the creation of job opportunities, and efficient service delivery. Furthermore, the IDP promotes the expansion and strengthening of Cape Town's tourism sector. Therefore, the proposed mixed-use tourism and hotel development is in line with the CoCT IDP, as it should provide job opportunities during both the construction and operational phases. Additionally, once operational, the development will expand and strengthen Cape Town's and the Western Cape's tourism market; therefore, promoting inclusive economic growth.

4.3.	The Spatial Development Framework of the local municipality.

The 2023 CoCT MSDF promotes and welcomes growth in established urban nodes which contains existing infrastructure, public transport connectivity, and high concentrations of economic activity. The proposed mixed-use tourism and hotel development therefore aligns with the SDF, as the proposed development will intensify and expand an existing metropolitan growth node (V&A Waterfront) within the Table Bay District, which has been identified by the MSDF as one of the City's primary development corridors and a strategically important urban destination. Furthermore, the MSDF promotes compact, mixed-use development in well-serviced areas. The proposal therefore supports this objective, given its central location and high levels of existing connectivity. This will therefore strengthen walkability, and assist in integrating tourism, retail, and accommodation within a single precinct. Finally, the development supports the SDF's goals for economic diversification, public-realm enhancement, and sustainable coastal management, by improving public access along the waterfront, contributing to place-making, and integrating coastal resilience measures in line with the City's coastal and climate adaptation policies.

In addition to the MSDF, the development also falls under the Table Bay District SDF (DSDF, 2023), which has a more localised and specific scope/ objectives, when compared with the MSDF. The Table Bay DSDF promotes new developments within existing urban nodes, specifically in areas such as the V&A Waterfront, which already have high economic value, high tourism value, and existing established infrastructure. The DSDF further supports mixed-use developments which will intensify, improve, and expand the urban environment in urban nodes, through enhancing public space, walkability and economic activity. Furthermore, the DSDF aims to protect sensitive coastal and heritage areas, while simultaneously aiming to strengthening the district's role as one of Cape Town's primary economic and tourism hubs. As with the MSDF, the proposed development aligns closely with, and will support, the objectives of the DSDF.

The development has been informed by a BA process and the completion of required specialist studies, which consider the interface between the development and the coastal environment as well as sensitive heritage receptors. This has assisted in identifying potential impacts and informing appropriate mitigation measures and environmental management controls in accordance with applicable legislation and best practice.

4.4.	The Environmental Management Framework applicable to the area.

The Table Bay District EMF is a component of the Table Bay DSDF and provides environmental guidance to support sustainable land use planning within the district. It identifies environmental constraints and opportunities to inform appropriate development, with an emphasis on protecting sensitive areas while supporting the use and intensification of already transformed urban environments.

The proposed development is in line with the District EMF, as the development site is located in the existing, transformed urban node of the Table Bay District and Cape Town, where development is encouraged to limit pressure on environmentally sensitive areas. The EMF supports the redevelopment of well serviced urban areas, provided that potential impacts on coastal processes, biodiversity, heritage resources, and visual character are appropriately avoided, managed, and mitigated. The development further aligns with these objectives through the incorporation of environmental best-practice design, consideration of coastal resilience, and the enhancement of public access to the waterfront.

A Site Sensitivity Verification (SSV) process concluded that no significant impacts are expected on biodiversity resources, including terrestrial flora and fauna, aquatic systems, or marine resources. Given the proximity to the marine environment, a marine specialist was also consulted and confirmed that the development footprint is entirely within a highly transformed terrestrial area with no natural marine habitat present. The marine assessment concluded that potential impacts on the marine environment are likely to be insignificant, with no anticipated direct disturbance, no changes to hydrodynamic function, and no deterioration in water quality. Any potential construction-related risks, such as litter or accidental runoff, can be effectively managed through standard mitigation measures and good housekeeping practices, and no irreversible impacts on marine form or function are expected.

5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.

During the SSV process, it was determined that a Marine Compliance Statement, as well as Socio-Economic, Heritage, and Visual Impact Assessments, were required to inform the BA. Of these, only the Marine Assessment specifically addressed biodiversity-related considerations. The marine specialist concluded that potential impacts on the marine environment are likely to be insignificant, as the development is located within a highly transformed terrestrial area with no direct disturbance to marine habitat, no alteration of hydrodynamic function, and no deterioration in water quality anticipated. Any potential construction-related risks, such as litter or accidental runoff, were identified as minor and can be effectively managed through standard mitigation measures and good housekeeping practices. On this basis, no irreversible impacts on marine biodiversity or ecosystem functioning are expected, and a Compliance Statement was deemed sufficient. Nevertheless, precautionary mitigation measures have been included for incorporation into the EMPr. In relation to heritage and visual aspects, full specialist assessments were undertaken, and the recommendations, including mitigation measures, have informed the design response and been incorporated into the development approach to ensure compliance with both the NEMA EIA Regulations and the National Heritage Resources Act.

All specialist reports have been appended to the pre-application Draft BAR.

6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.

The Western Cape Biodiversity Spatial Plan (WC BSP), including the associated implementation guidelines in the handbook, was consulted to determine whether the proposed development is located within or in close proximity to any Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), or other identified biodiversity features along the Table Bay coastline.

The screening undertaken during the BA process confirmed that the proposed development footprint is not located within, nor in close proximity to, any mapped CBAs, ESAs, or other sensitive biodiversity features. As a result, no direct impacts on these biodiversity areas are anticipated, and the WC BSP has primarily served to confirm the suitability of the site for development from a biodiversity spatial planning perspective.

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.

According to the ICMA, relevant coastal management zones include Coastal Public Property (CPP), the Coastal Protection Zone (CPZ), Coastal Access Land, Coastal Waters, Coastal Protected Areas, Special Management Areas (SMAs), and Coastal Setback Lines.

The proposed development site was assessed against these zones during the early stages of the process to ensure alignment with relevant ICMA spatial considerations, and this also informed the identification of applicable listed activities triggered by the development.

The site does not fall within CPP, as the V&A Waterfront land was historically alienated in terms of the Seashore Act and is therefore excluded from CPP provisions. In addition, the site is excluded from the CPZ, as the Port of Cape Town and V&A Waterfront are excluded from the Coastal Management Line in terms of Western Cape Provincial Gazette (O.N. 25 of 2021). This delineation is reflected in the City of Cape Town SDF and on the City's Open Data Portal.
However, the site is located within approximately 100 m of the high-water mark and is therefore situated within a coastal environment, and portions occur seaward of the coastal setback line, triggering Listing Notice 1, Activity 19A as identified by the Minister through Section 24(2) of NEMA, (107 of 1998).

While the formal ICMA spatial control areas (such as CPP and the CPZ) do not apply to the site, the principles of ICMA remain relevant to inform responsible coastal planning and environmental management. This includes consideration of coastal resilience, appropriate interface with the coastal edge, and the protection of adjacent marine and coastal systems. Accordingly, the development has been informed by ICMA principles to ensure that potential coastal-related risks are appropriately managed and that the interface between the built environment and the coastal zone is planned in a sustainable and environmentally responsible manner. A Basic Assessment process is therefore being undertaken to ensure compliance with the National Environmental Management Act (NEMA) and associated regulations and to assess potential impacts on the coastal environment.

Notwithstanding this, both the EAP and the marine specialist concluded that the site comprises fully reclaimed, artificial land that has been extensively transformed. The area is currently used as a developed urban surface (parking and associated infrastructure) within the V&A Waterfront. As such, the site does not function as a natural coastal system in terms of ICMA-defined environmental characteristics, and the relevant zoning considerations are therefore interpreted in the context of this highly modified environment.

In addition, the site is zoned as Mixed Use 3 (MU3) and therefore designated for urban development.

8.	Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I.

The Screening Tool report appended to the NOI and this pre-application Draft BAR is the first and only report submitted with this application.

9.	Explain how the proposed development will optimise vacant land available within an urban area.

The proposed development site is located within the approved City of Cape Town urban edge and the existing urban area of the V&A Waterfront. The site is currently utilised as a parking area. While not vacant in the strict sense, the site is underutilised in terms of its development potential. The proposed development therefore optimises the use of this land by increasing its intensity and contributing to the densification and more efficient use of an already urbanised area.

10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.

The proposed development forms a brownfields extension of the existing V&A Waterfront and will be integrated into the established urban area and infrastructure network. It will make use of existing services and infrastructure connections, thereby avoiding the need for significant new bulk infrastructure provision.

11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).

All necessary municipal services are available to the site. Confirmation of capacity will be obtained from the City of Cape Town through a formal Services Capacity Letter, which will be submitted with the Final BAR.

12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.

NEED

Cape Town's V&A Waterfront is a 123-hectare mixed-use neighbourhood within the Southern Hemisphere's oldest working harbour. Situated between the Cape Town central business district, the Port of Cape Town, and the Atlantic Seaboard suburbs of Green Point and Mouille Point, it is one of South Africa's most iconic destinations, with Table Mountain as its backdrop. The V&A Waterfront has not only changed the face of an underutilised port area but in more strategic terms has changed the character of Cape Town and created a new 'City and Tourist destination'. This, in turn, has provided unprecedented opportunities for new economic development, inward investment and branding for a reinvented city. These opportunities have included: socio economic benefits for Cape Town's CBD, the development of new visitor markets, job creation, environmental enhancements, historic conservation, and city and regional promotion. The V&AW has achieved a large take-up of its approved development rights. There are, however, large areas of the property, notably the Granger Bay and Breakwater Precinct areas, that are undeveloped or underdeveloped in terms of their current use.

The timing of this development is therefore appropriate, as there is a need for more residential development near the amenities and facilities of the Waterfront, as well as a need to increase the number of job opportunities within the central city. Development in the central city has reached a stage where there are few relatively large parcels of land-, with existing rights (and a coastal location), available for residentially led mixed use development. Other Need-related considerations are as follows:

- The development meets the need of expanding amenity opportunities for central city residents and visitors to the V&A Waterfront.
- The development will result in a significant piece of urban infrastructure being accessible to the public, with this infrastructure being re-invigorated from its current low-value/ degraded state.
- The development will support the on-going viability of the V&A Waterfront which, as stated prior, is a critical tourism node for the City, Province, and Republic as a whole. Consequently, the development will positively contribute to the city's economic needs and will help address the objectives within the CoCT's IDP.

DESIRABILITY

This application demonstrates that the development's proposed land uses are spatially appropriate, relative to its local context and surrounding developments. Furthermore, the proposal is in alignment with the development rights and policies applicable to the site. Other desirability considerations are as follows:

- This application demonstrates that the proposed land uses in the development are entirely spatially appropriate, relative to the existing developments in its proximity. The development is also in alignment with the development rights and policies applicable to the site.
- The site is effectively undeveloped (it is currently functioning as an underutilised parking area). Consequently, this development will be highly beneficial from an opportunity-cost perspective.
- The proposed development will generate significant economic benefits associated with both employment and expenditure (during the construction and operational phases). This has the potential of affording significant social benefits to the individuals employed during these phases, while also contributing to the increased earnings for the City, through income tax.
- The anticipated increased revenues afforded by this new development will both provide value to the private beneficiaries within the V&A Waterfront, but will also contribute towards the City's overall revenue, due to the increase in rates and taxable earnings of the V&A.
- The wider area will likely see experience and increase in property values, which will benefit both the landowners, yet also increase the City's revenue due to the increased rates associated with these increased values.
- The development will potentially increase pedestrian access to the coast—facilitated through the upgrading of the coastal promenade, and construction of the new coastal park—which will both have positive social impacts.
- The project will not result in any significant biophysical impacts, provided all necessary mitigation measures are implemented. Consequently, the development is highly beneficial from an environmental cost-benefit perspective.
- It is envisaged that the proposed public amenities (Atlantic Park and the upgraded promenade) will enhance public access to the precinct; will enhance the precinct's visitor experience, while also improving public access to the water's edge.

KEY DESIGN OBJECTIVES AND CONSIDERATIONS

The Urban Design Framework vision and principles for future development within the V&A Waterfront, and to be implemented for this development proposal, are anchored on the following central development objectives:

- to enhance and protect public access to the water's edge;
- to visually connect the area to the ocean and mountains;
- to establish public spaces with streets and squares;
- to promote safe and comfortable pedestrian movement as a priority;
- to create a variety and range of residential and other income generating opportunities; and
- to build regenerative urban and natural ecosystems.

The broader development area associated with the Application site envisages the following:

- The realignment of Breakwater Boulevard between the traffic circle, immediately adjacent to the site, and the gap in the historic Breakwater wall to establish a street edged by development on both sides to create a safe and comfortable pedestrian environment.
- The extension and expansion of the water's edge promenade to create a more enhanced public realm

- A coherent and continuous public realm that prioritises pedestrian movement while accommodating vehicular and pedestrian access
- Development parcels to the north of the realigned Breakwater Boulevard (this project) to create a variety and range of mixed use opportunities including residential, hotel and cultural land uses.

SECTION F: PUBLIC PARTICIPATION

The Public Participation Process ("PPP") must fulfil the requirements as outlined in the NEMA EIA Regulations and must be attached as Appendix F. Please note that If the NEM: WA and/or the NEM: AQA is applicable to the proposed development, an advertisement must be placed in at least two newspapers.

1. Exclusively for linear activities: Indicate what PPP was agreed to by the CA. Include proof of this agreement in Appendix E22.

N/A

2. Confirm that the PPP as indicated in the application form has been complied with. All the PPP must be included in Appendix F.

6.1 PRE-APPLICATION PUBLIC PARTICIPATION PROCESS

The PPP will be undertaken in accordance with Chapter 6 (Sections 39 to 44) of the 2014 Environmental Impact Assessment (EIA) Regulations, as amended, under the National Environmental Management Act (NEMA; Act 107 of 1998). Since the project includes both a pre-application phase and an application phase, two rounds of public participation will be conducted. These processes will follow a similar approach.

6.1.1 STAKEHOLDER IDENTIFICATION, REGISTRATION AND THE CREATION OF DATABASE

A stakeholder database (or I&AP database) has been compiled for the project. This includes all I&APs as outlined in Section 40(2) of the EIA Regulations, as well as additional key and potential I&APs. Other potential I&APs will be informed of the process through A2 site notices and a newspaper advertisement. These individuals and organisations will be invited to register as I&APs and will be added to the database upon request. Any person or organisation that submits comments or attends a meeting will also be registered.

6.1.2 METHODS OF NOTIFICATION AND AVAILABILITY OF DOCUMENTS

Notices will be distributed to inform I&APs about the proposed project and the opportunity to provide comment. These notices will include:

- A summary of the proposed activities;
- Information about the PPP, including the timeline and how to access the pre-application Draft BAR; and
- Instructions on how, by when, and to whom comments must be submitted.

In accordance with the EIA Regulations, the following methods will be used for notification:

- **Site Notices:** Two A2-sized notice boards will be displayed in visible locations near the project site:
  - One along Breakwater Boulevard, at or near the site boundary;
  - The other on or near East Pier Road, on the opposite side of the site.
- **Newspaper Advertisement:** A notice will be published in the Cape Times.
- **Email Notifications and Official Correspondence:** Written notifications will be sent via email to all relevant I&APs with email addresses, including:
  - Relevant National and Provincial government departments;
  - Relevant environmental departments within the City of Cape Town Metropolitan Municipality;
  - The Ward Councillor for Ward 115 of the City of Cape Town, Mr Ian McMahon; and
  - Any other potential and / or registered I&APs currently listed on database.

6.1.3 Availability of draft pre-app BAR & Comment Period

The draft pre-application BAR is being made available for a 30-day public review and comment period from 21 August 2026-21 September 2026. During this period, the document will be accessible in the following ways:

- As a hard copy at the Colin Eglin Sea Point Public Library (1 Three Anchor Bay Rd, Three Anchor Bay, Cape Town); and
- In digital format on Anchor Environmental's website: https://anchorenvironmental.co.za/public-documents.

Potential or registered I&APs may submit comments during this period via email, post, by handing in written comments at the library, by phone, or verbally during the potential public meeting.

6.1.4 Comments And Responses Table

All comments received during the pre-application phase will be documented in a Comments and Responses (C&R) Table. A Stakeholder Engagement Report, including records of all notifications, correspondence, and proof of the PPP, will be compiled and submitted as part of the final pre-application BAR.

6.2 Official Application Phase Public Participation Process

A formal PPP will be conducted during the Application Phase. It The same notification procedures and methods used during the pre-application PPP will be followed. It is not anticipated that an additional public meeting will be required during this stage. Only if a meeting is requested by an I&AP, will one be considered. All new comments received will be recorded in an updated C&R Table. A Stakeholder Engagement Report documenting the process and including proof of notification will be compiled and submitted with the Final BAR.

Table 3. Public Participation requirements in terms of Chapter 6 (Sections 39–44) of the 2014 EIA Regulations and the way these requirements will be fulfilled for the proposed mix-used development.

GN 982, Reference	Content	How Requirement Was / Will Be Fulfilled
CHAPTER 6: PUBLIC PARTICIPATION		
39 Activity on land owned by person other than proponent		
39(1)	If the proponent is not the owner or person in control of the land on which the activity is to be undertaken, the proponent must, before applying for an EA in respect of such activity, obtain the written consent of the landowner or person in control of the land to undertake such activity on that land.	N/A
39 (2)	(2) Subregulation (1) does not apply in respect of- (a) linear activities; and (b) ..... (c) strategic integrated projects as contemplated in the Infrastructure Development Act, 2014.	N/A
40 Purpose of public participation		
40 (1)	The public participation process to which the (a) BAR and EMPr, and the closure plan in the case of a closure activity, submitted in terms of regulation 19; and	Two separate 30-day PPP will be undertaken: 1. **Pre-Application Phase:** A 30-day public participation process is being conducted in August/Sep 2026, during which I&APs are given the

GN 982, Reference	Content	How Requirement Was / Will Be Fulfilled
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	(b) Scoping report submitted in terms of regulation 21, the environmental impact assessment report, EMPr, and the closure plan in the case of a closure activity, submitted in terms of regulation 23; was subjected to must give all potential or registered interested and affected parties, including the CA, a period of at least 30 days to submit comments on each of the BAR, EMPr, scoping report and environmental impact assessment report, and the closure plan in the case of a closure activity, as well as the report contemplated in regulation 32, if such reports or plans are submitted at different times.	opportunity to review and provide comment on the pre-application Draft BAR and EMPr prior to formal submission. 2. **Application Phase:** A second 30-day comment period will be held during the formal application phase, allowing I&APs, authorities and the CA a further opportunity to review and comment on the updated BAR and EMPr.
40(2)	The public participation process contemplated in this regulation must provide access to all information that reasonably has or may have the potential to influence any decision with regard to an application unless access to that information is protected by law and must include consultation with (a) the CA; (b) Every State department that administers a law relating to a matter affecting the environment relevant to an application for an EA; (c) All organs of state which have jurisdiction in respect of the activity to which the application relates; and (d) All potential, or, where relevant, registered interested and affected parties.	Documents containing all relevant information that could influence decision-making will be made publicly accessible throughout the public participation processes. Hard copies will be available at the Colin Eglin Sea Point Public Library (1 Three Anchor Bay Rd, Three Anchor Bay, Cape Town), and digital versions will be accessible on Anchor Environmental's website. All potential I&APs listed in the compiled database will be directly notified of the availability of the reports and invited to participate. These include relevant authorities such as the CA, State departments responsible for environmental matters, and organs of state with jurisdiction over aspects of the proposed development. In addition, broader notification will be achieved through a newspaper advertisement and the placement of A2 site notices to ensure that any additional potential I&APs are informed and given an opportunity to register and comment.
40(3)	Potential or registered interested and affected parties, including the CA, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but must be provided with an opportunity to comment on such reports once an application has been submitted to the CA	An official 30-day PPP will be conducted after the pre-app PPP.
41 Public participation process		
41 (2) (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	An A2 notice board will be placed on Breakwater Boulevard near the entry of and on the boundary of the site.
	(ii) any alternative site;	An A2 notice will also be placed on the other side of the site, such as on East Pier Road or close by.
41 (2) (b)	Giving written notice, in any of the manners provided for in section 47D of the Act, to—	***Section 47D of NEMA: Delivery of documents***

GN 982, Reference	Content	How Requirement Was / Will Be Fulfilled
CHAPTER 6: PUBLIC PARTICIPATION		
		(1) A notice or other document in terms of this Act or a specific environmental management Act may be issued to a person *-(a) by delivering it by hand;* *-(b) by sending it by registered mail* *(i) to that person's business or residential address; or* *(ii) in the case of a juristic person, to its registered address or principal place of business;* *-(bA) by faxing a copy of the notice or other document to the person, if the person has a fax number;* ***-(bB) by e-mailing a copy of the notice or other document to the person, if the person has an e-mail address; or*** *-(bC) by posting a copy of the notice or other document to the person by ordinary mail, if the person has a postal address;* *-(c) where an address is unknown despite reasonable enquiry, by publishing it once in the Gazette and once in a local newspaper circulating in the area of that person's last known residential or business address.* *(2) A notice or other document issued in terms of subsection (1) (b), (bA), (bB), (bC) or (c) must be regarded as having come to the notice of the person, unless the contrary is proved.*
(i)	the occupiers of the site and, if the 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 or to any alternative site where the activity is to be undertaken;	The site proposed for development is unoccupied and is currently used solely for parking and container storage. There are no residential, commercial, or informal occupiers who may be directly affected by the activity on the site itself. Furthermore, the V&A Waterfront is both the applicant and the legal owner and custodian of the site, meaning there is no separate party in control of the land. In the absence of any third-party land occupiers and given that the owner is already fully informed and actively involved in the application, there is no reasonable or practical basis to issue further notice in terms of this requirement. The purpose of this provision, to ensure that parties directly impacted by activities on a site are made aware of the application, has therefore been inherently met.
(ii)	owners, persons in control of, and occupiers of land adjacent to the site where the activity is or is to be undertaken	The site is bordered by land that is either owned by the V&A Waterfront or by state entities, with the exception of the northern boundary, which is adjacent to the marine environment. The land immediately surrounding the site to the south, east, and west was previously used for parking associated with the Victoria Wharf Shopping Centre and Table Bay Hotel (also V&A-owned) but is now an active construction

GN 982, Reference	Content	How Requirement Was / Will Be Fulfilled
CHAPTER 6: PUBLIC PARTICIPATION		
		area with no current occupiers. As such, there are no private or residential landowners or occupiers adjacent to the site that require notification. The only adjacent landowners or authorities not under the V&A's control are the Department of Forestry, Fisheries and the Environment (DFFE): Oceans and Coasts, and Transnet National Ports Authority. Both entities have been included in the I&AP database and will be formally notified via email in accordance with Section 47D(1)(bB) of the NEMA, which permits notification by email where an email address is available. Given that the surrounding land is either unoccupied or owned by the applicant, and all other relevant adjacent authorities are accounted for in the I&AP list and will be notified, the requirements of this section will be met.
(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;	Email notification will be sent to the municipal councillor for Ward 115 of the City of Cape Town (CoCT), Mr Ian McMahon, in accordance with Section 47D(1)(bB) of the NEMA. No active ratepayers' associations operating within the project area have been identified. However, the three nearest associations surrounding the area have been included on the I&AP database. Should any additional relevant organisations be identified during the public participation process, they will be added to the database and notified accordingly.
(iv)	the municipality which has jurisdiction in the area;	Email notifications will be sent to several environmental and land use branches within the CoCT Municipality. This notification will be issued in accordance with Section 47D(1)(bB) of NEMA.
(v)	any organ of state having jurisdiction in respect of any aspect of the activity; and	Written notice will be provided via email (in accordance with Section 47D(1)(bB) of NEMA) to all relevant organs of state that have jurisdiction over aspects of the proposed activity. This includes DEA&DP and its relevant branches/directorates; the Department of Economic Development and Tourism; the Department of Infrastructure; the City of Cape Town Municipality; Heritage Western Cape and the South African Heritage Resources Agency (SAHRA); the South African Civil Aviation Authority (SACAA) or ATNS as relevant; CapeNature, as well as the Western Cape/ Regional HODs or contacts for the National Department of Water and Sanitation. Note this list is not exhaustive.
(vi)	any other party as required by the CA;	N/A at this stage
41 (2) (c)	Placing an advertisement in	
	i. one local newspaper; or	A public notice will be placed in the Cape Times, a local newspaper circulated in the

GN 982, Reference	Content	How Requirement Was / Will Be Fulfilled
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	ii. (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;	area where the proposed activity is to take place. As a result, publication in an official Gazette is not necessary.
41 (2) (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	N/A as the proposed activity is not anticipated to result in any environmental or socio-economic impacts that extend beyond the boundaries of the CoCT Metropolitan Municipality.
41 (2) (e)	using reasonable alternative methods, as agreed to by the Department, 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.	This requirement is noted, although it is N/A at this stage. It will be complied with should it become necessary.
41 (3) (a)	A notice, notice board or advertisement referred to in subregulation (2) must give details of the application or proposed application which is subjected to public participation; and	This requirement is noted and will be complied with.
41 (3) (b)	State (i) whether BA or Scoping and Environmental Impact Assessment Report (S&EIAr) 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.	These requirements are noted and will be complied with.
41 (4)	A notice board referred to in subregulation (2) must **(a)** be of a size of at least 60 cm by 42 cm; and **(b)** Display the required information in lettering and in a format as may be determined by the CA.	These requirements are noted and will be complied with.
41 (5)	Where public participation is conducted in terms of this regulation for an application or proposed application, subregulation (2)(a), (b), (c) and (d) need not be complied with again during the additional public participation process contemplated in regulations 19(1)(b) or 23(1)(b) or the public participation process contemplated in regulation 21(2)(d), on condition that **(a)** such process has been preceded by a public participation process which included compliance with subregulation (2)(a), (b), (c) and (d); and **(b)** Written notice is given to registered interested and affected parties regarding where the **i.** Revised documents as contemplated in regulation 19(1)(b); **ii.** Revised documents as contemplated in regulation 23(1)(b); or **iii.** environmental impact assessment report and documents as contemplated in regulation 21(2)(d); may be obtained,	N/A, as the standard 90-day BA process is being followed. The process does not involve the submission of a notice in terms of the 140-day extension under regulation 19(1)(b), nor does it include the submission of an Environmental Impact Report as contemplated in regulation 23(1)(b) or a Scoping Report as contemplated in regulation 21(2)(d).

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	the manner in which and the person to whom representations on these reports or plans may be made and the date on which such representations are due.	
41 (6)	When complying with this regulation, the person conducting the public participation process must ensure that **(a)** information containing all relevant facts in respect of the application or proposed application is made available to potential interested and affected parties; and **(b)** participation by potential or registered interested and affected parties is facilitated in such a manner that all potential or registered interested and affected parties are provided with a reasonable opportunity to comment on the application or proposed application.	These requirements are noted and will be complied with. Two public participation processes will be undertaken, one during the pre-application phase and one during the application phase, each allowing for a 30-day comment period. This ensures that all potential and registered I&APs have reasonable and repeated opportunities to access relevant information and provide input. During these periods, the draft reports will be made available in both hard copy and digital formats. I&APs will be able to submit comments via email, post, telephonically, or verbally during a public meeting (should such a meeting be held based on sufficient RSVPs).
41 (7)	Where an EA is required in terms of these Regulations and an authorisation, permit or licence is required in terms of a specific environmental management Act, the public participation process contemplated in this Chapter may be combined with any public participation processes prescribed in terms of a specific environmental management Act, on condition that all relevant authorities agree to such combination of processes	N/A
42 Register of interested and affected parties		
42 (2)	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 CA, 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.	This requirement is noted and will be complied with. A database has been compiled and included as an Appendix. This database will be updated throughout the project.
43 Registered interested and affected parties entitled to comment on reports and plans		
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	This is requirement is noted.

GN 982, Reference	Content	How Requirement Was / Will Be Fulfilled
CHAPTER 6: PUBLIC PARTICIPATION		
	that party may have in the approval or refusal of the application.	
43 (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.	This requirement is noted. All relevant State departments have been included on the project's I&AP list.
44 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 CA in terms of these Regulations.	This requirement is noted. A C&R Table will be included as part of the final BAR submitted to the CA. All comments received during the public participation process will be documented, and relevant inputs will be incorporated into the final report where applicable. Records of any meetings held will also be appended to the report
44 (2)	Where a person desires but is unable to access written comments as contemplated in subregulation (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.	This requirement is noted, although it is not currently applicable. Should any person indicate that they are unable to access or provide written comments, reasonable alternative methods will be made available. Such individuals will be assisted in submitting verbal comments, including during the public meeting, where applicable.

3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.

ORGANISATION	NAME	CONTACT DETAILS
NATIONAL		
Department of Water and Sanitation (DWS)	Nelisa Ndobeni	NdobeniN@dws.gov.za
	Warren Dreyer	DreyerW@dws.gov.za
South African Civil Aviation Authority (SACAA)	Lizell Stroh	StrohL@caa.co.za
	Siphokazi May	MayS@caa.co.za
	Victress Mashava	MashavaV@caa.co.za
PROVINCIAL		
Department of Environmental Affairs and Development Planning (DEA&DP)	Admin	DEADPEIAAdmin@westerncape.gov.za
	Kraigen Govindasamy	Kraigen.Govindasamy@westerncape.gov.za
DEA&DP: Coastal Management	Ieptieshaam Bekko	Ieptieshaam.Bekko@westerncape.gov.za
	Mysoero George	Mysoero.George@westerncape.gov.za
DEA&DP: Biodiversity and Coastal Management	Melissa Naiker	Melissa.Naiker@westerncape.gov.za
DEA & Waste Management:	Lance McBain-Charles	Lance.McBain-Charles@westerncape.gov.za
	Abdullah Suliman	Abdullah.Suliman@westerncape.gov.za
	Eugene Pienaar	Eugene.Pienaar@westerncape.gov.za
	Shaun Arendse	Shaun.Arendse@westerncape.gov.za
DEA &Pollution Management	Gunther Frantz	Gunther.Frantz@westerncape.gov.za
Department of Economic Development and Tourism	Jo-Ann Johnston	echohead@westerncape.gov.za
	Joe-Mark Arnold	Joe-Mark.Arnold@westerncape.gov.za
Department of Infrastructure: Transport Planning	Vanessa Stoffels	vanessa.stoffels@westerncape.gov.za
CapeNature	Ismat Adams	Iadams@capenature.co.za
LOCAL/ MUNICIPAL		
CoCT: Environmental Management; Central and E&HM Region	Maurietta Stewart	Maurietta.Stewart@capetown.gov.za
CoCT Ward 115 Councillor	Cllr. Ian McMahon	Ian.McMahon@capetown.gov.za
HERITAGE AUTHORITIES		
Heritage Western Cape	Sofia Vy Menell Briel	Sofia.VyMenellBriel@westerncape.gov.za
OTHER ORGANS OF STATE		
TNPA (Cape Town)	Bongani Dilima	Bongani.Dilima@transnet.net
	Inga Ndudula	Inga.Ndudula@Transnet.net
	Cacisa Kalane	Cacisa.Kalane@transnet.net
	Sinqobile Nkabinde	Sinqobile.Nkabinde@transnet.net
DFFE: Oceans and Coast	Ryan Peter	JPeter@dffe.gov.za
CIVIC STAKEHOLDERS		
Mouille Point Ratepayer's Association	Jane Meyer	janemeyer@mpra.co.za
Green Point Ratepayers' Association	Glynis Johnson	info@gprra.co.za / anneglynis@gmail.com

4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

All state departments with interest in this project were/ will be contacted.

5. if any of the State Departments and Organs of State did not respond, indicate which.

This section will be completed after the first public participation period has concluded.

6. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated into the development proposal.

This section will be completed after the first public participation period has concluded.

Note:

A register of all the I&AP's notified, including the Organs of State, <u>and</u> all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing.

The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

Your attention is drawn to Regulation 40 (3) of the NEMA EIA Regulations which states that "*Potential or registered interested and affected parties, including the CA, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but* ***must*** *be provided with an opportunity to comment on such reports once an application has been submitted to the CA.*"

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F.

All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F.

Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required "proof" the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
  - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);
  - if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
  - if a facsimile was sent, a copy of the facsimile Report;
  - if an electronic mail was sent, a copy of the electronic mail sent; and
  - if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and
- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1 GROUNDWATER

1.1.	Was a specialist study conducted?	~~YES~~	**NO**
1.2.	Provide the name and or company who conducted the specialist study.		
N/A			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
N/A			
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
N/A Development situated on reclaimed land. Will not influence any aquifer or groundwater.			

2 SURFACE WATER

2.1.	Was a specialist study conducted?	~~YES~~	**NO**
2.2.	Provide the name and/or company who conducted the specialist study.		
N/A			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		
N/A. No watercourses or wetlands in the area. Despite the site falling within a delineated estuarine functional zone (EFZ), according to the National Freshwater Ecosystem Priority Areas (NFEPA) mapping layer, the more recent EFZ delineation process, published during the 2018 National Biodiversity Assessment (NBA), removed this EFZ classification, as it was erroneous, and not reflected in reality (there is no estuary in this vicinity; Figure 11). This has been confirmed through site visits and consultation with Anchor's estuarine specialists			

Figure 11. Comparison between the 2011 NFEPA Wetlands (and Estuaries) Layer, and the estuary delineation within the 2018 NBA.

COASTAL ENVIRONMENT

3.1	Was a specialist study conducted?	**YES**	~~NO~~
3.2	Provide the name and/or company who conducted the specialist study.		
Ms Amy Wright from Anchor Environmental Consultants (Pty) Ltd			
3.3	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		

Applicability of the Integrated Coastal Management Act

As the proposed development will take place within a coastal area (within 100 m inland of the high-water mark of the sea), portions of Parcels O and P are situated seaward of the identified development setback line, coupled with the fact that Cape Town itself deriving a great deal of value from its proximity to the sea, alignment with certain provisions of ICMA is critical for this development.

Refer to Section 63 (1) of the National Environmental Management: ICMA; Act 24 of 2008) states that: "*Where an EA in terms of Chapter 5 of the National Environmental Management Act is required for coastal activities, the CA must take into account all relevant factors, including—*

#	Gazetted Description	Response
a	(a) the representations made by the applicant and by interested and affected parties;	All comments received from the commenting authorities and registered interested and affected parties will be addressed within the CRR.
b	(b) the extent to which the applicant has in the past complied with similar authorisations;	EA was granted on 10 April 2019 by the Western Cape DEA&DP for the construction of a permanent dolos revetment and associated land reclamation (approx. 2.3 ha) in the Granger Bay precinct (Appendix G5; Ref. No. M 3/6/5). Construction has not yet commenced.
c	whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas;	**CPP:** The proposed development site is not Coastal Public Property, nor will the proposed development have any impact on Coastal Public Property. **CPZ:** The CPZ is defined within ICMA as: "*the area comprising coastal public property, the coastal protection zone, coastal access land, coastal protected areas, the*

seashore and coastal waters, and includes any aspect of the environment on, in, under and above such area;"

Furthermore, Section 16 of ICMA defines the composition of the CPZ as follows:

"(1) Subject to subsection (2) and section 26, the coastal protection zone consists of-

~~a. land falling within an area declared in terms of the Environment Conservation Act, 1989 (Act 73 of 1989), as a sensitive coastal area within which activities identified in terms of section 21 (1) of that Act may not be undertaken without an authorisation;~~

~~b. any part of the littoral active zone that is not coastal public property;~~

~~c. any coastal protected area, or part of such area, which is not coastal public property;~~

~~d. any land unit situated wholly or partially within one kilometre of the high-water mark which, when this Act came into force-~~

~~i. was zoned for agricultural or undetermined use; or~~

~~ii. (ii) was not zoned and was not part of a lawfully established township, urban area or other human settlement;~~

e. any land unit not referred to in paragraph (d) that is situated wholly or partially within 100 metres of the high-water mark;

~~f. any coastal wetland, lake, lagoon or dam which is situated wholly or partially within a land unit referred to in paragraph (d) (i) or (e);~~

~~f(A). the part of a river which is situated within a land unit referred to in paragraph (d) (i) or (e);~~

~~g. any part of the seashore which is not coastal public property, including all privately owned land below the high-water mark;~~

~~h. any admiralty reserve which is not coastal public property; or~~

~~i.~~ any land adjacent to an area referred to in paragraphs (a) to (h) that would be inundated by a 1:100 year flood or storm event."

The site falls within 100 m of the high-water mark of the sea, as well as potentially either being inundated during a 1:100 year flood or storm event, or being located adjacent to land that will experience such inundation.

However, the site does not fall within the CPZ, as a notice published in the Western Cape Provincial Gazette (O.N. 25 of 2021) excludes the Port of Cape Town and V&A Waterfront from the Coastal Management Line, and therefore from the CPZ. This spatial delineation is reflected in the CoCT SDF, and is also available on the CoCT Open Data Portal (https://odp-cctegis.opendata.arcgis.com/search).

Notwithstanding this exclusion, the proposed development remains consistent with the intent of CPZ objectives, particularly in relation to responsible coastal interface management. The marine specialist concluded that potential impacts on the marine environment are likely to be insignificant, as the development is located within a highly transformed terrestrial area with no direct disturbance to marine habitat, no alteration of hydrodynamic function, and no deterioration in water quality anticipated. Any potential construction-related risks, such as litter or accidental runoff, were identified as minor and can be effectively managed through standard mitigation measures and good housekeeping practices. On this basis, no irreversible impacts on marine biodiversity or ecosystem functioning are expected.

Coastal Access Land

Coastal Access Land is defined as follows in terms of ICMA: "means land designated as coastal access land in terms of section 18 (1), read with section 26;".

The proposed development site is not classified as Coastal Access Land. Notwithstanding this, the development will not negatively affect coastal access in the surrounding area. In addition, the proposed upgrades to the promenade and the creation of Atlantic Park are expected to enhance and improve public access to the coastal environment within the broader precinct.

		Conclusion The proposed development is not anticipated to result in adverse impacts on the surrounding coastal environment, provided that appropriate mitigation measures and best practice construction controls are implemented. In addition, the development may offer positive benefits in terms of improved and enhanced public access to the coastal environment within the broader precinct.
d	the estuarine management plans, coastal management programmes, coastal management lines and coastal management objectives applicable in the area;	**City of Cape Town Coastal Management Programme 2014** The CoCT Coastal Management Programme (2014) provides a strategic framework for the sustainable use, protection, and development of the City's coastline, in accordance with the ICMA. It guides coastal decision-making by addressing issues such as coastal access, risk management, ecosystem protection, and climate change adaptation, while supporting appropriate economic and recreational development along the coast. **Western Cape Coastal Management Programme 2022-2027** The Western Cape Provincial CMP is a strategic framework mandated under the ICMA, which guides sustainable coastal management, conservation, and planning within the province. The proposed development is consistent with the objectives of both the CoCT and the Western Cape CMP as it promotes sustainable economic development within an existing coastal urban node, thereby reducing pressure on undeveloped and environmentally sensitive coastal areas. The development further supports the Programme's objectives through consideration of coastal risk and climate resilience in its planning approach, as well as by contributing to improved and responsible public access to the coastal environment. In addition, the CMP provides an overarching strategic framework for coastal planning and management in the area. Although the proposed development is located in close proximity to the marine environment, it has been designed and assessed with this context in mind to minimise potential environmental impacts. The BA process has considered the interface between the development and the coastal environment, including potential minor, short-term construction-related risks such as accidental spillage, sediment-laden runoff, or material loss entering the marine environment. These risks are considered low in magnitude and are capable of being effectively managed through standard construction-phase mitigation measures and environmental controls in accordance with applicable legislation and best practice.
e	the socio-economic impact if the activity- (i) is authorised; (ii) is not authorised;	**If Authorised** The proposed mixed-use tourism and hotel development will replace an existing parking area within the V&A Waterfront and is expected to generate significant positive socio-economic benefits. These include expansion of the tourism and hospitality sector, increased accommodation capacity, and associated benefits for the local and national economy. The development will also create short- and long-term employment opportunities, resulting in increased household income, skills development, and broader contributions to government revenue during both the construction and operational phases. Temporary positive impacts during construction include contributions to gross output and GDP, employment creation, and associated household income benefits. During operation, sustained positive impacts are expected in relation to GDP contribution, employment, household income, and government revenue, as well as skills development, enhancement of public open space and amenity value, and strengthening of the visitor economy. Negative socio-economic impacts are expected to be limited and short term, primarily associated with construction-phase noise, dust, and physical health and safety risks. These impacts are localised to the immediate site and surrounding area and can be effectively managed through standard construction controls, occupational health and safety measures, dust suppression, noise management, and regulated site access. No significant long-term socio-economic negative impacts are anticipated. Consequently, the proposed development is anticipated to result in significant positive socio-economic benefits, which outweigh the minor and short-term negative impacts associated with the construction phase.

		If not Authorised Should the 'no-go' alternative be deemed favourable, the site will remain the same, a largely unused carpark area of negligible value, and the (minor with mitigation) negative impacts during the construction phase would be avoided. However, this alternative would result in none of the predicted socio-economic benefits from this development being realised. Lost benefits include: 1. No additional value to the V&A will occur due to the creation of additional revenue streams; 2. no additional accommodation will be created in this high-value area of the city; 3. no employment opportunities will arise during both the construction and operation phases, and hence no benefit will be experienced by local communities; 4. and no opportunities for the gaining of experience and upskilling by workers will occur This alternative therefore bears the opportunity cost implications of missed socio-economic benefits to the local community. The review of the net effects of the proposed development and the trade-offs between positive and negative impacts suggest that positive impacts would vastly outweigh the minor negative impacts. **Consequently, the construction and operation of the proposed development is preferred over the 'no-go' alternative (i.e., it is preferrable form a socio-economic perspective that the proposed development be constructed).**
g	the likely impact of coastal environmental processes on the proposed activity;	The proposed development is located directly adjacent to the coast, however, it is expected to have a negligible impact on the coastal environmental processes, assuming that appropriate mitigation measures are employed. This is because it is located in a built-up urban area, will be constructed entirely on reclaimed land, and is thus already irreversibly altered from its natural condition. The site therefore supports no sensitive environmental and coastal resources. The marine specialist concluded that potential impacts on the marine environment are likely to be insignificant, as the development is located within a highly transformed terrestrial area with no direct disturbance to marine habitat, no alteration of hydrodynamic function, and no deterioration in water quality anticipated. Any potential construction-related risks, such as litter or accidental runoff, were identified as minor and can be effectively managed through standard mitigation measures and good housekeeping practices. On this basis, no irreversible impacts on marine biodiversity or ecosystem functioning are expected. The marine specialist identified the following mitigation measures for inclusion in the EMPr: • Intentional disposal of any substance into the environment is strictly prohibited, while accidental spillage must be prevented, contained and reported immediately. • All hazardous substances must be accompanied by a permit, a hazard report sheet, and a first aid treatment protocol and may only be handled by suitably trained operators. • Spill kits must be available on site at all times, and staff must be trained in their proposed use. **Consequently, the proposed development is not anticipated to result in any irreversible changes to marine form or function, and is supported from a marine ecology perspective**
	whether the development or activity	
h	i) is situated within coastal public property and is inconsistent with the objective of conserving and enhancing coastal public property for the benefit of current and future generations	As described above, the development will not be situated within CPP, and will have no significant negative impacts on the CPP.

	(ii) is situated within the coastal protection zone and is inconsistent with the purpose for which a coastal protection zone is established as set out in section 17;	As described above, the development will not take place within the CPZ and, regardless, it will not contravene the purpose of the CPZ.
	(iii) is situated within coastal access land and is inconsistent with the purpose for which coastal access land is designated as set out in section 18;	The site is not located within coastal access land and, regardless, the development will have no negative impacts on coastal access and has the potential of improving coastal access due to the proposed upgrades to the promenade and the construction of Atlantic Park.
	(iv) is likely to cause irreversible or long-lasting adverse effects to any aspect of the coastal environment that cannot satisfactorily be mitigated;	It has been confirmed by the marine specialist that the development will not have any significant impacts on the marine environment, provided that certain mitigation measures are implemented.
	(v) is likely to be significantly damaged or prejudiced by dynamic coastal processes;	The development will not significantly damage or prejudice dynamic coastal processes.
	(vi) would substantially prejudice the achievement of any coastal management objective;	This development will not substantially prejudice the achievement of any coastal management objectives.
	or (vii) would be contrary to the interests of the whole community;	The socio-economic assessment has demonstrated that the development will, almost exclusively, have positive impacts on the surrounding community.
l	whether the very nature of the proposed activity or development requires it to be located within coastal public property, the coastal protection zone or coastal access land;	As stipulated above, the development will not be located within the CPP, CPZ, or Coastal Access Land.
j	whether the proposed activity or development will provide important services to the public when using coastal public property, the coastal protection zone, coastal access land or a coastal protected area	While the development is located adjacent the sea, and will improve overall access to the coast through the upgrades to the promenade and construction of Atlantic Park, it is unlikely to directly improve access to the coastal public property (given that it would not be safe for individuals to access the water via the existing dolosse revetment). The development will also not provide additional access to the CPZ, coastal access land, or coastal protected area, as the adjacent coastline doesn't meet any of these criteria (and access is constrained due to the dolosse revetment, as indicated prior).
k	The objects of this Act, where applicable.	This development will not contravene the objects of ICMA, assuming that appropriate mitigation measures are employed.

In conclusion, the proposed development, together with the integrated approach employed in its formulation, aligns with the intent and objectives of the ICMA, particularly in relation to responsible coastal interface management and balancing environmental care with inclusive economic growth.

3.4.	Explain how estuary management plans (if applicable) have influenced the proposed development.

The site does not fall in or close to a delineated EFZ (as the original NFEPA delineation was subsequently revoked), hence no estuary management plans have influenced this development.

3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.

The site does not fall within, nor is located close to delineated Estuarine Function Zones (EFZ), Coastal Protection Zones (CPZ) or Coastal Risk Zones (CRZ).

It is located near to the marine environment, however, the marine specialist concluded that potential impacts on the marine environment are likely to be insignificant, as the development is located within a highly transformed terrestrial area with no direct disturbance to marine habitat, no alteration of hydrodynamic function, and no deterioration in water quality anticipated. Any potential construction-related risks, such as litter or accidental runoff, were identified as minor and can be effectively managed through standard mitigation measures and good housekeeping practices i.e.

- Intentional disposal of any substance into the environment is strictly prohibited, while accidental spillage must be prevented, contained and reported immediately.
- All hazardous substances must be accompanied by a permit, a hazard report sheet, and a first aid treatment protocol and may only be handled by suitably trained operators.
- Spill kits must be available on site at all times, and staff must be trained in their proposed use.

On this basis, no irreversible impacts on marine biodiversity or ecosystem functioning are likely to result from the proposed development and, should any minor and localised disturbance to the adjacent coastal environment occur during construction, the affected area is expected to recover or be restored to its current state within two years of completion of the construction phase. Therefore, the mapped coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones did not influence the proposed development as it is not within such zones.

4 BIODIVERSITY

4.1	Were specialist studies conducted?	~~YES~~	**NO**
4.2	Provide the name and/or company who conducted the specialist studies.		

4.2.1 Terrestrial Biodiversity, Aquatic Biodiversity, Plant Species, and Animal Species themes

In terms of the SSV, the site is located within a built-up, highly transformed environment on reclaimed land and does not support natural vegetation, aquatic features, or faunal habitat. As a result, no impacts on terrestrial or aquatic biodiversity are anticipated, and the Terrestrial Biodiversity, Aquatic Biodiversity, Plant Species, and Animal Species themes were screened out, with no further specialist studies required.

4.2.2 Marine Theme

Given the site's proximity to the marine environment, potential impacts on the marine environment were considered. A detailed Marine Impact Assessment was not required, and a Marine Ecological Compliance Statement was deemed sufficient to assess potential interactions with the adjacent marine environment. This was undertaken by Amy Wright of Anchor Environmental Consultants.

4.3	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, National Spatial Biodiversity Assessment (NSBA) etc. have been used and how has this influenced your proposed development.

These informants have been used to contextualise the development, and to confirm the conclusions that the site is not of conservation or ecological importance.

4.3.1 Critical Biodiversity and Areas of Conservation Concern

The Western Cape Biodiversity Spatial Plan (WCBSP, 2023) identifies terrestrial priority areas for biodiversity conservation, encompassing diverse ecosystems, species, and ecological processes. Within the CoCT Metropolitan Municipality, this plan has been further refined in the City's Systematic Biodiversity Plan, commonly referred to as the "Biodiversity Network" or "BioNet" (City of Cape Town, 2023). These areas are 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 as a whole (Pool-Stanvliet et al., 2017). The spatial representation of these priority areas is captured in CBA maps. The delineation of these priority areas for the nearshore marine environment was recently completed for the first time, by Harris et al. (2022). The marine CBA Map has been developed to align with the categories presented in the WCBSP, BioNet, and other national biodiversity spatial plans, to support integrated environmental management and assessment processes.

The mapping datasets used to construct these CBA maps include CBAs, ESAs and formally Protected Areas (Pool-Stanvliet et al., 2017; Harris et al., 2022; City of Cape Town, 2023b).

The proposed development area does not intersect with any of these priority biodiversity areas (Figure 12).

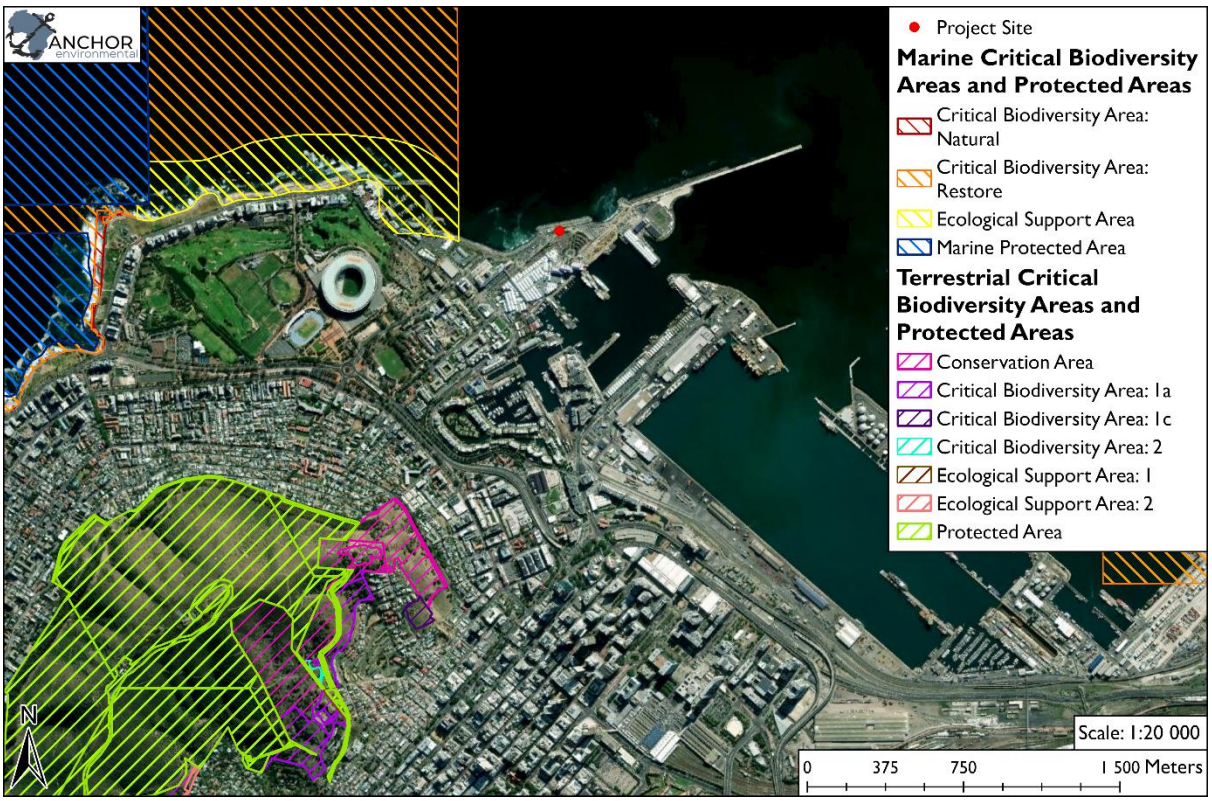

Figure 12. Marine, Terrestrial, and Aquatic CBAs in the area (Harris et al., 2022; City of Cape Town, 2023b).

4.3.2 Ecosystem Threat Status and Ecosystem Types

The NBA Ecosystem Threat Status Classification (2018), developed by SANBI, assesses the threat status and sensitivity of different habitat types. These ratings are based on biodiversity (richness, uniqueness, spatial extent of the habitat type), exposure levels to natural disturbance or environmental perturbations, and the degree to which ecosystems are still intact or losing vital aspects of their structure, function, or composition (SANBI, 2019). Ecosystem (vegetation) types are then categorised as "Critically Endangered", "Endangered", "Vulnerable", "Near Threatened", or "Least Concern". The assessment and categories are based on the International Union for Conservation of Nature (IUCN) Red List of Species and Ecosystems assessment frameworks.

The proposed area falls within the Cape Mixed Shore Ecosystem (Figure 13), which has been classified as a "Vulnerable" Marine Ecosystem (Figure 14). According to the National list of ecosystems that are threatened and in need of protection, as published under the National Environmental Management: Biodiversity Act (NEMBA; Act 10 of 2004), "Vulnerable" ecosystems are "ecosystems that have a high risk of undergoing significant degradation of ecological structure, function or composition as a result of human intervention, although they are not critically endangered ecosystems or endangered ecosystems". Despite this classification, the site is heavily degraded and artificial. In addition, as the proposed development will take place entirely on land, there is no anticipated removal or disturbance of marine habitat.

The site does not overlap with any Terrestrial or Aquatic Ecosystems of concern, neither does it overlap with any Ecosystems considered to be "Endangered" or "Critically Endangered" (Figure 13 and Figure 14).

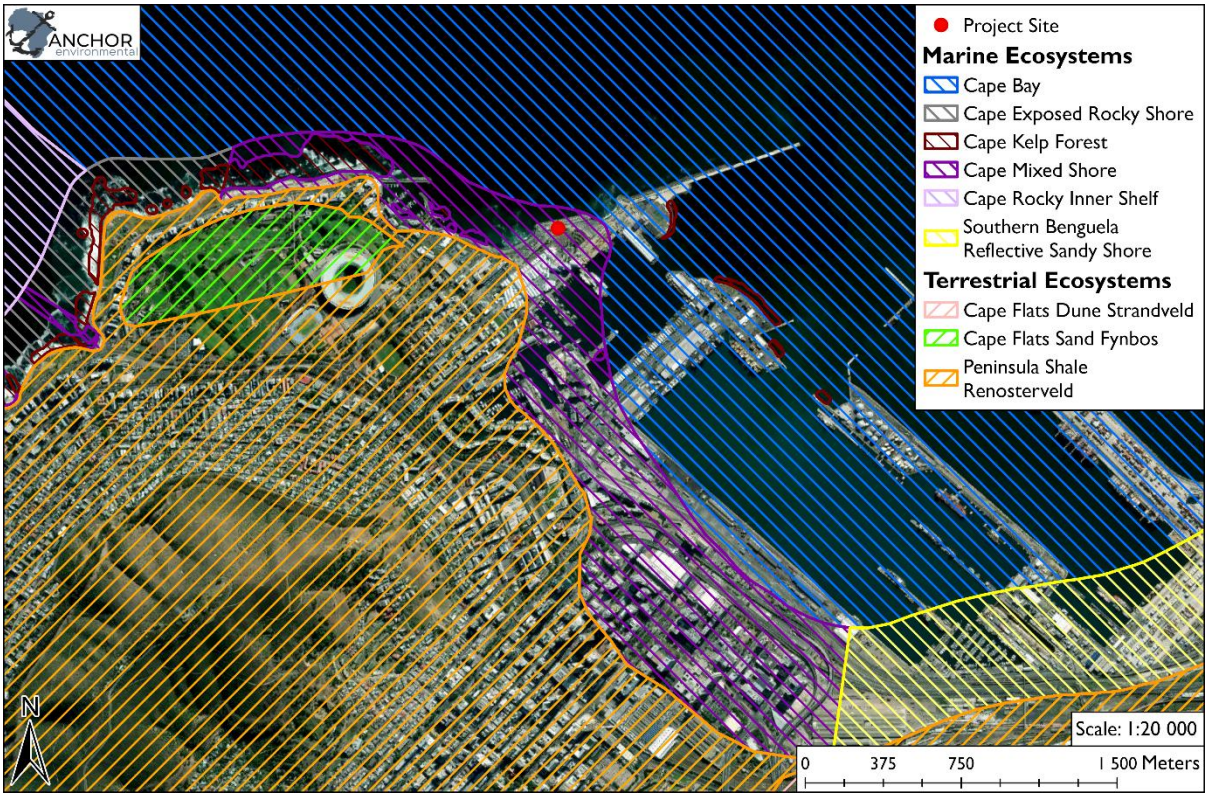

Figure 13. Marine and Terrestrial Ecosystem types within the area as per the 2018 NBA (Sink et al. 2019; Skowno et al. 2019).

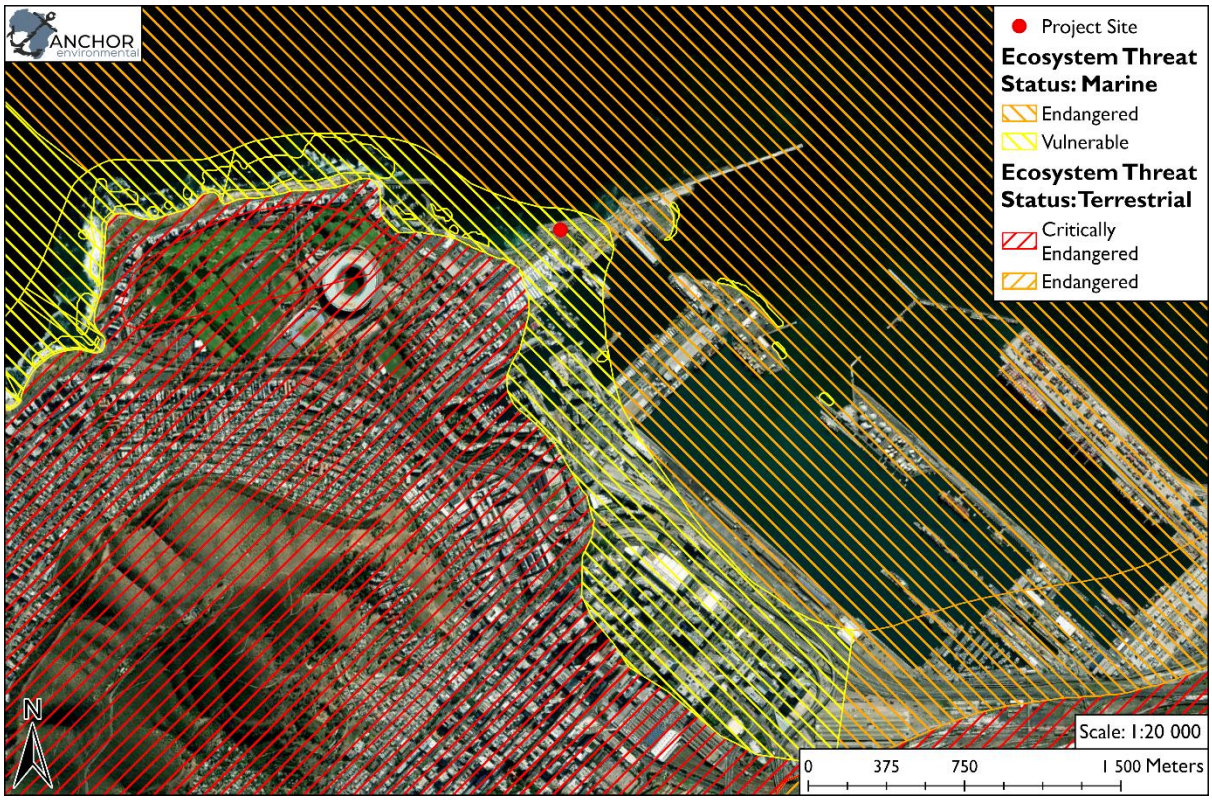

Figure 14. Marine and Terrestrial Threat Status of the area as per the 2018 NBA (Sink et al., 2019; Skowno et al., 2019).

4.3.3 Key Biodiversity Areas

Key Biodiversity Areas (KBAs) are internationally recognised as "sites that contribute significantly to the global persistence of biodiversity," whether in terrestrial, freshwater, estuarine, or marine ecosystems (SANBI, 2024).

The entire project site falls outside of, and is not in close proximity to, any designated KBA (Figure 15).

Figure 15. Delineated Key Biodiversity Areas within the area (South African KBA NCG, 2024).

4.3.4 National Freshwater Ecosystem Priority Areas

NFEPAs identify and prioritise strategic freshwater ecosystems that are important for conserving biodiversity and supporting the sustainable use of South Africa's water resources (Nel et al., 2011). NFEPA provides guidance on which rivers, wetlands, and estuaries should be maintained in a natural or near-natural state. According to the NFEPA Wetland dataset, the development footprint overlaps with a wetland area, classified as "Estuarine," which has a Wetland Condition (WetCon) rating of Z2. This indicates that most of the wetland is classified as artificial, and corresponds with a Present Ecological State (PES) rating of "Heavily to Critically Modified."

However, the classification of this area as a wetland/ estuarine environment is inaccurate. In reality, there is no estuarine habitat present within the port, harbour, or V&A Waterfront area. The EFZ layer from the 2018 NBA (published in Van Niekerk et al., (2019a), seven years after the 2011 NFEPA dataset) shows that the nearest estuary, the Salt River Estuary, is located approximately 4.3 kilometres to the east.

Furthermore, the National Wetlands Map Version 5 (Van Deventer et al., 2018), which is the currently accepted spatial dataset for wetlands, does not indicate any wetland features overlapping with the site. It also confirms that the closest wetland is the Salt River Estuary (Figure 16).

In summary, based on the most up-to-date spatial datasets, the site does not intersect with any freshwater or estuarine ecosystems. Consequently, the proposed development will have no impact on these resources and, by extension, NFEPA resources in the area.

Figure 16. Location of the proposed development in relation to freshwater and estuarine features, including NFEPA rivers and wetlands (Nel et al., 2011)), the Estuarine Functional Zone (EFZ) (Van Niekerk et al., 2019a) and wetlands delineated in the National Wetlands Map Version 5 (Van Deventer et al., 2018).

4.3.5 Strategic Water Source Area

The site falls within the broader "Table Mountain Surface Water Strategic Water Source Area" (SWSA) (Figure 17). Surface water SWSAs are defined as land areas that contribute a disproportionately high volume of mean annual surface water runoff relative to their size, while groundwater SWSAs are areas with both high groundwater availability and national-level importance. Although the proposed development falls within a designated SWSA, this classification covers much of the western Cape Town area and in reality the site does not contribute any surface water run-off to any downstream catchment that may be of value as a water resource or for aquatic biodiversity because there is no downstream catchment as the site abuts the coast and is on reclaimed land.

Given the urban nature and location of the development, it is not expected to have any impact on the functioning or integrity of the SWSA, or hydrological resources in general. Furthermore, as the site is situated next to the coastline with no downstream water users, potential changes in surface water runoff are not expected to pose any risk to the availability, sustainability, or security of freshwater resources.

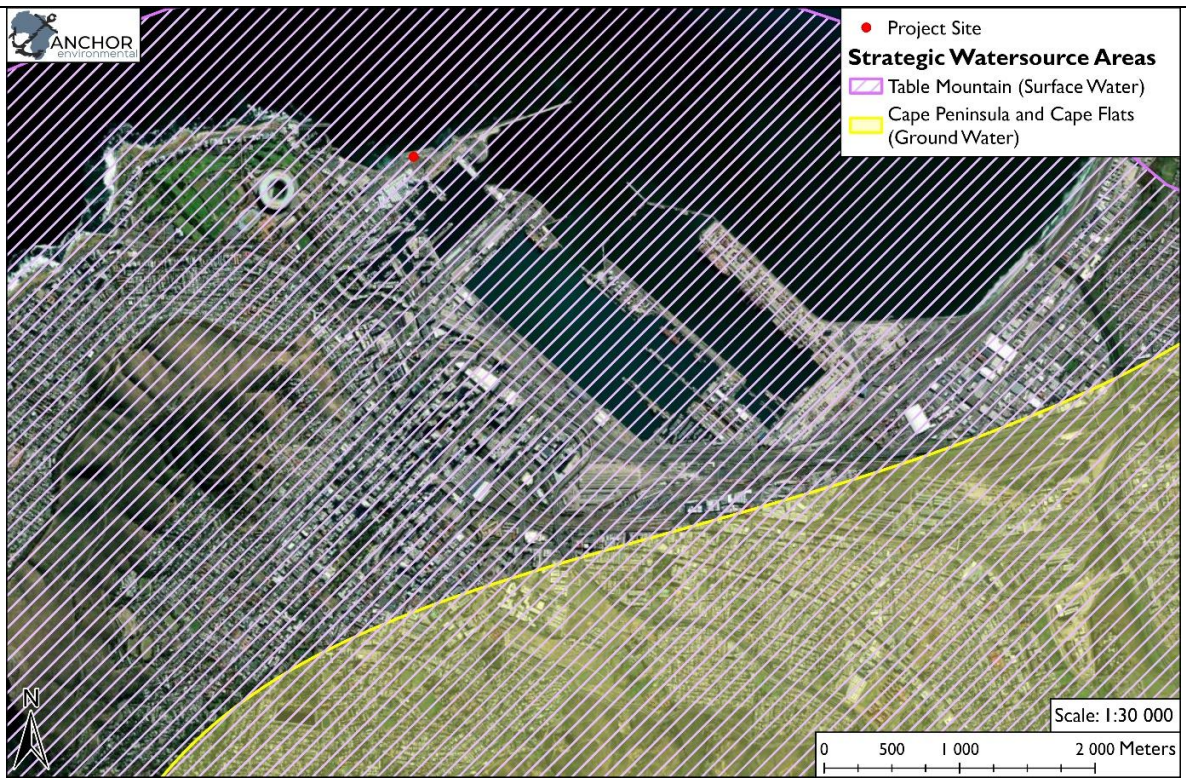

Figure 17. Strategic Water Source Areas National Freshwater Ecosystem Priority Areas in the area. The site falls within the Table Mountain Surface Water SWSA (Le Maitre et al., 2018).

4.4 Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.

Please also refer to Section 4.3 (within this section, Section G) above, which contains further details of this assessment.

The Biodiversity Spatial Plan was reviewed to inform the assessment of the proposed development.

The site does not intersect with any priority biodiversity areas, including CBAs, ESAs, Protected Areas, or designated KBAs (Figure 12; Figure 15). In addition, no freshwater or estuarine ecosystems are present, and the development will therefore not impact on these resources or associated NFEPA features (Figure 16). The site also does not overlap with any terrestrial or aquatic ecosystems of concern, nor with ecosystems classified as Endangered or Critically Endangered (Figure 13 and Figure 14).

Given the highly urbanised nature and location of the site, the development is not expected to affect the functioning or integrity of the SWSAs or broader hydrological processes. The site is located adjacent to the coastline, with no downstream freshwater users, and any changes in surface water runoff are unlikely to affect the availability, sustainability, or security of freshwater resources Figure 17). Based on the above, the Biodiversity Spatial Plan provides no specific or relevant guidance for the layout or design of the proposed development.

4.5.	Explain what impact the proposed development will have on the site-specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.
Refer to the Sections 4.3 and 4.4 above (within Section G). Given that the site already has negligible ecological value (due to it being an almost entirely artificially surfaced parking area situated on reclaimed land), the development will have no bearing on any BSP categories. The site is completely artificial and does not contribute to biodiversity targets.	
4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.
Refer to Sectio 4.3 above and Figure 12. The proposed development site does not fall within a protected area.	
4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.
No sensitive fauna is expected to occur on the proposed development site, as both the site and surrounding area are on reclaimed land and are highly transformed and urbanised, comprising commercial, tourism, and residential developments. However, due to the site's proximity to the marine environment, a marine specialist was consulted. The marine specialist confirmed that the site is located on reclaimed land and is physically separated from the marine environment, with no functional connectivity or marine species present, resulting in very low marine sensitivity and "**Insignificant**" expected impacts. Mitigation measures have nevertheless been recommended for inclusion in the EMPr to avoid or minimise any potential impacts.	

5 GEOGRAPHICAL ASPECTS

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.
It is not expected that the proposed development will generate negative impacts on geographical features, nor will geographic features impact the proposed development in a significant way.

6 HERITAGE RESOURCES

6.1	Was a specialist study conducted?	**YES**	~~NO~~
6.2	Provide the name and/or company who conducted the specialist study.		

6.2.1 HERITAGE IMPACT ASSESSMENT (HIA):

The Heritage Impact Assessment (HIA) was principally conducted by Cindy Postlethwayt (Appendix G2) and informed by the following supporting specialist studies:

- The Archaeological Impact Assessment (AIA)**—completed by John Gribble of TerraMare Archaeology (Pty)** Ltd (Appendix G3)
- The Townscape and Visual Impact Assessment**—completed by Claire Abrahamse** (Appendix G4).
- Socio-Economic Impact Assessment (SEIA)**—completed by Gwyneth Letley of Anchor Environmental Consultants (Pty) Ltd** (Appendix G1)

6.2.2 BACKGROUND TO THE INTEGRATED HIA

An HIA was undertaken to assess the potential impacts of the proposed development on heritage resources. This HIA was required both as part of the Basic Assessment (BA) process in terms of the NEMA EIA Regulations and by Heritage Western Cape (HWC) in terms of the National Heritage Resources Act, 1999 (Act No. 25 of 1999; NHRA).

On 28 October 2024, HWC issued a Section 38(4) Record of Decision (RoD) for the Rezoning Application on inter alia Erf Re-149294, V&A Waterfront, Cape Town (HWC23060705SJ0609). In this RoD, HWC stipulated that any development on Parcels 12 i, O, P, Q, R, S, a1 and a2 would require further heritage assessment in terms of Section 38 of the NHRA, including the submission of a Notification of Intent to Develop (NID) and an HIA. The RoD further indicated that detailed site-specific analysis of significance and indicators would be required, building on the preliminary Townscape and Visual Study, and noted that separate HIAs for each parcel would not necessarily be required, provided sufficient information was available to assess cumulative impacts. Following submission of an NID for the proposed development on Parcels O, P, a1, and a2, HWC issued a subsequent Record of Decision (HWC25052618SJ0528) on 9 June 2025 confirming the requirement for an HIA and providing additional guidance on its scope. Specifically, the HIA was required to include assessment of Archaeological, Visual, and Townscape Impacts. Although the project is land-based, an archaeological assessment was required due to the reclaimed nature of the site and the potential for excavations to encounter former seabed deposits, including maritime and underwater cultural heritage resources.

In terms of the existing Memorandum of Understanding (MoU) between HWC and the Department of Environmental Affairs and Development Planning (DEA&DP) on the integrated consideration of HIAs within NEMA applications, a single integrated HIA was prepared by Cindy Postlethwayt to satisfy the requirements of both the NEMA EIA Regulations and the NHRA. The assessment incorporated inputs from the supporting specialist studies listed above, each addressing specific heritage-related impact receptors.

6.3	Explain how areas that contain sensitive heritage resources have influenced the proposed development.

6.3.1 Summary of Identified Heritage Resources

Much of the text in the following sections has been quoted directly from the HIA, AIA, and Townscape/Visual Impact Assessment (Appendices G2, G3, and G4).

A heritage resource is defined as "any place or object of cultural significance", including those with aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance (National Heritage Resources Act ((Act No. 25 of 1999; NHRA); Section 2(xvi)).

The site falls into one of the outer edges of the core area of the V&A Waterfront, that generally comprise a 21st century layer of commerce, culture and tourism that has been overlaid onto older remnants – earlier coastal fortifications, breakwaters and the old hospital precinct. These areas combine many of the heritage features within the newer development and do reinforce public space and townscape links between the heritage sites. They allow for a transition from the city into the core V&A heritage area. Other physical heritage assets and character elements in the surrounding area include Old Somerset Hospital, Fort Wynyard (located outside the V&A boundary), the Breakwater Wall, the water's edge (coastal walk, quay edges) the working components of the area, some of which are now redundant, including the cranes, and the berthing of the SA Agulhas II vessel.

However, it must be noted that the Granger Bay and Breakwater side of the site consists largely of landfill and temporary land uses located in an ad hoc manner. There is little sense of townscape, and the primary character component of any significance is the spatial and visual contact with the water's edge.

The nature of public access to the water's edge has considerable socio-historical significance, as does the visual-spatial linkage of heritage resources in the immediate vicinity (such as Somerset Hospital and the Breakwater) to the sea.

The established elements of heritage significance and heritage informants for this part of the Precinct include:

- The Breakwater Boulevard as a visual axis, from Somerset Hospital to the sea.
- The historic Breakwater Wall, and the views obtained from it.
- The direct pedestrian engagement with the sea edge obtained along this part of the coastline.
- The expansive views over Table Bay and towards Robben Island that are achieved here.

The site has no other intrinsic heritage significance and is significant largely in its relationship to surrounding heritage resources and contextual character, particularly its position along the coastline. Maritime archaeological and submerged pre-colonial archaeological resources in or on the former seabed, below the fill that comprises the current land surface of the project area may be expected. Terrestrial historical archaeological resources are not expected on the project site. Although historical artefacts may be present within the fill, these will have little archaeological value, because they will lack both their original context and provenance.

Additional information pertaining to individual heritage aspects is included within this report. However, given the integrated nature of the HIA—and thus the extensive overlap between each aspect—they have been divided into individual sections, for the purposes of complying with the report template; improving readability; and eliminating duplication. The breakdown is as follows:

The archaeological aspects of heritage, which principally pertains to the potential existence/preservation of "tangible" material culture/artefacts, are detailed in 6.3.2, whereas the more "intangible" heritage aspects—which includes the historical context of the project site and surrounds, as well as the visual and townscape aspects—are detailed in Section 7. Furthermore, despite informing other HIA aspects, specific socio-economic factors are detailed in Section 8, and have thus been omitted from Section 6 and 7 (to avoid duplication).

6.3.2 Archaeological and other Tangible Heritage

The proposed development area is located on made ground, comprising fill deposited at various stages between the late 19th and late 20th centuries as part of the development of the Breakwater Precinct west of the historical breakwater wall in the harbour.

Archaeological monitoring of recent basement excavations at both the adjoining Q and R portions of the Granger Bay precinct and Quay 7 on the eastern side of the breakwater wall indicate that this fill is very varied and while there is some potential for the presence of historical artefacts within the fill, such material will have very little archaeological value, having lost both its original context and provenance. The fill underlying the development site is, therefore, of very low archaeological potential or value (Appendix G3).

The 2024 AIA for the whole of the V&A identified areas of archaeological sensitivity within the V&W and indicates that the project site has potential maritime archaeological sensitivity.

Heritage resources that were identified to be relevant to the AIA, in terms of Section 2 of the NHRA, included: Material remains of human activity older than 100 years (including artefacts and human remains), rock art older than 100 years, and any archaeological artefacts of cultural significance. These resources are legally protected, and any disturbance requires a permit from SAHRA or HWC.

6.3.3 Maritime Archaeology

South Africa's historical shipwrecks are an extremely valuable repository of information about global maritime trade during the last five centuries and potentially much further back into the past.

Several texts and a shipwreck database maintained by TerraMare Archaeology, indicate that more than 20 shipwrecks or shipping losses occurred in the area between the Green Point and Granger Bay between the 16th and 19th centuries (Figure 18).

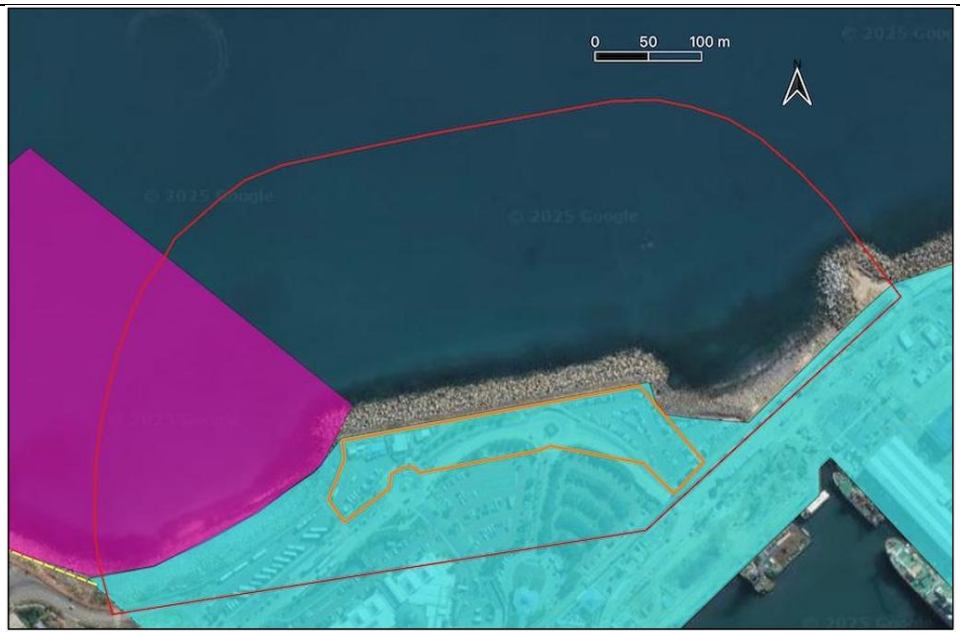

Figure 18. The Phase 1B project area (orange polygon) overlaid on the archaeological sensitivities within the V&W identified in Gribble (2024). The project area (orange is in an area of maritime sensitivity (blue) and adjacent to the pink polygon which represents the shipwreck potential of Granger Bay.

6.3.4 Submerged Pre-colonial Archaeology

The exposed continental shelf was repeatedly populated by terrestrial flora and fauna, and by our human ancestors who were dependant on these resources, and for periods numbering in the tens of thousands of years, on at least three occasions during the last 500,000 years, our ancestors inhabited areas of what is now seabed around the South African coast.

Increasingly frequent discoveries provide evidence for the survival of prehistoric archaeological sites on and within the current seabed.

The recovery in the mid-1990s of three Early Stone Age handaxes, dating from between 300,000 and 1.4 million ago, from Pleistocene sediments in an ancient submerged and infilled river channel on the eastern shore of Table Bay provides potential to find pre-colonial archaeological sites and artefacts in submerged, seabed contexts within Table Bay (Figure 19).

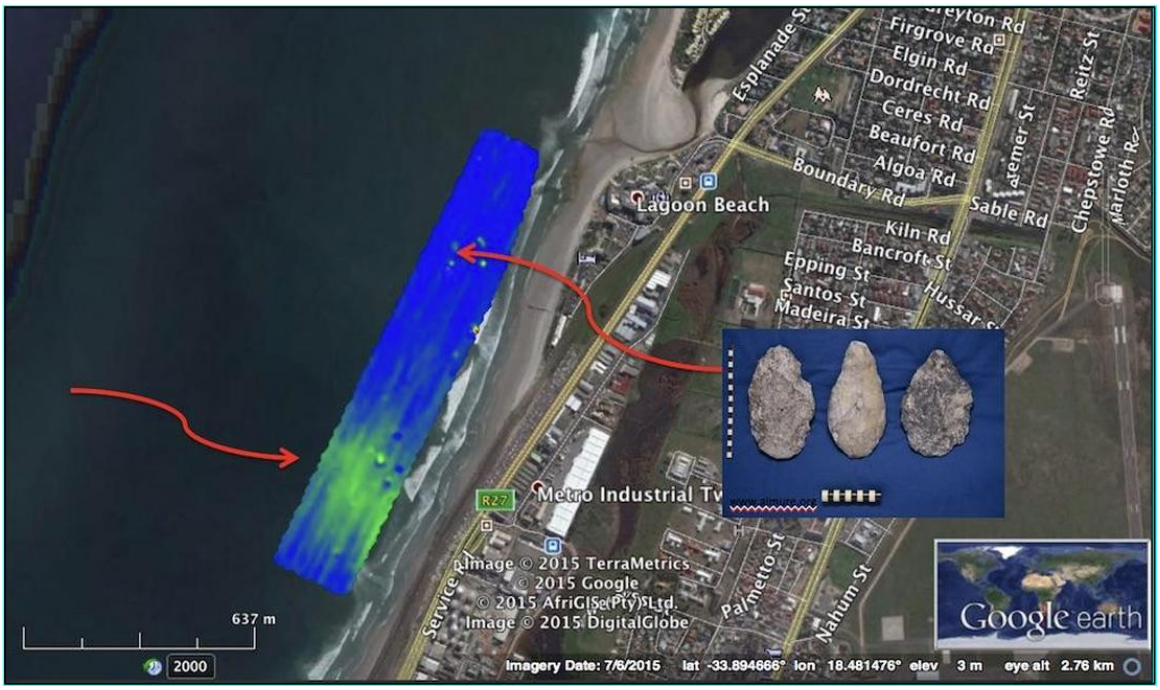

Figure 19. Location of the find of Table Bay ESA handaxes (inset) off Milnerton (top arrow) overlain on magnetometer data which shows the submerged palaeo-channel (green) of the Salt River (bottom arrow) (Sources: Google Earth; http://www.aimure.org/index.php/aimure-projects).

7 HISTORICAL AND CULTURAL ASPECTS

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.

The proposed development has been informed by the heritage context of the area, including its historic character, visual setting, and sense of place. Building design, layout, and siting were influenced by this context to ensure compatibility with the existing urban and coastal environment, while heritage resources are present in the broader study area, the proposed development is not expected to result in significant adverse impacts on these resources.

7.1 HISTORIC AND CULTURAL OVERVIEW OF THE SITE

The heritage significance of the V&AW is hybrid in nature, reflecting changes in its role over time. Significance is thus considered to be understood and conveyed in terms of themes which have evolved over time and which reflect its transition from a purely working harbour and a place of forced labour and incarceration to its present role as a major tourism destination. Themes which characterise the V&A Waterfront and its evolution and which need to be taken into consideration in the grading of heritage significance include the following:

- Convict labour, Contract labour, Slavery, place of employment
- Maritime technology.
- Harbour technology (construction & related infrastructure).
- Place of distribution, commerce and trade.
- Fishing industry.
- Place of tourism and recreation.
- Place of punishment, incarceration.
- Symbolic role (place of liberation).
- Place of defence.
- Scenic qualities.

While many of these themes and roles are no longer operational, the physical fabric, to varying degrees, remains extant and has the potential to contribute to a sense of meaning and place character at the Waterfront. At the larger scale, three interlinking qualities are regarded as being fundamental to place character and heritage significance for this site:

1. The working harbour component: the grain silo and related elements; the fishing industry and related elements (warehouses, cranes), the ship repair industry and related elements.
2. The combination, variety and mix of the historic fabric with later developments reflecting the commercial and tourism role of Waterfront, embedded within a predominantly continuous public space system which provides multiple access to the water's edge.
3. The range and variety of scenic views, both into and from the precinct and across the basins, and towards landmark features such as Table Mountain, and the townscape qualities, particularly related to the building fabric immediately adjacent to the Alfred and Victoria Basins, established both by the nature of the historic fabric and the spatial relationships between buildings, and between buildings and the water's edge.

Based on evidence from historical maps and aerial photographs, the area south of the project site, in the corner of Granger Bay against the breakwater, was subject to gradual land reclamation from the early 1950s and by 1980 most of the project area had been reclaimed from the sea (Figure 20; Figure 21).

The reclaimed land that comprises the project site is, thus, a modern construction, no older than 70 years and will not contain in situ archaeological material or deposit related to the historical development of the harbour.

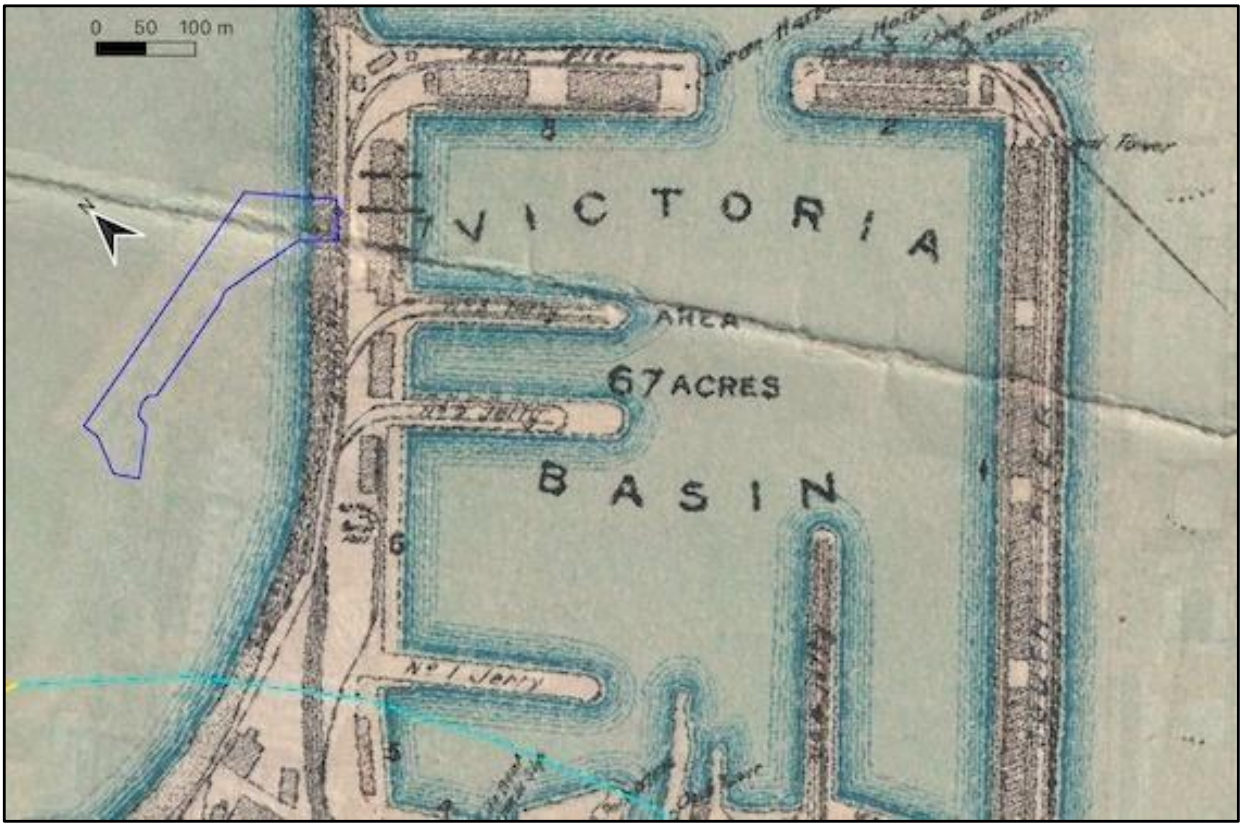

Figure 20. A 1911 chart of the harbour. The pale blue and yellow dotted lines represents the approximate position of the historical shoreline of Table Bay with the Alfred Basin on the landward side of the coast. The Victoria Basin has been constructed in the lee of the breakwater, north of the Alfred Basin. The proposed development area is indicated on the outer side of the Breakwater by the dark blue polygon (Source: UCT Online map collection).

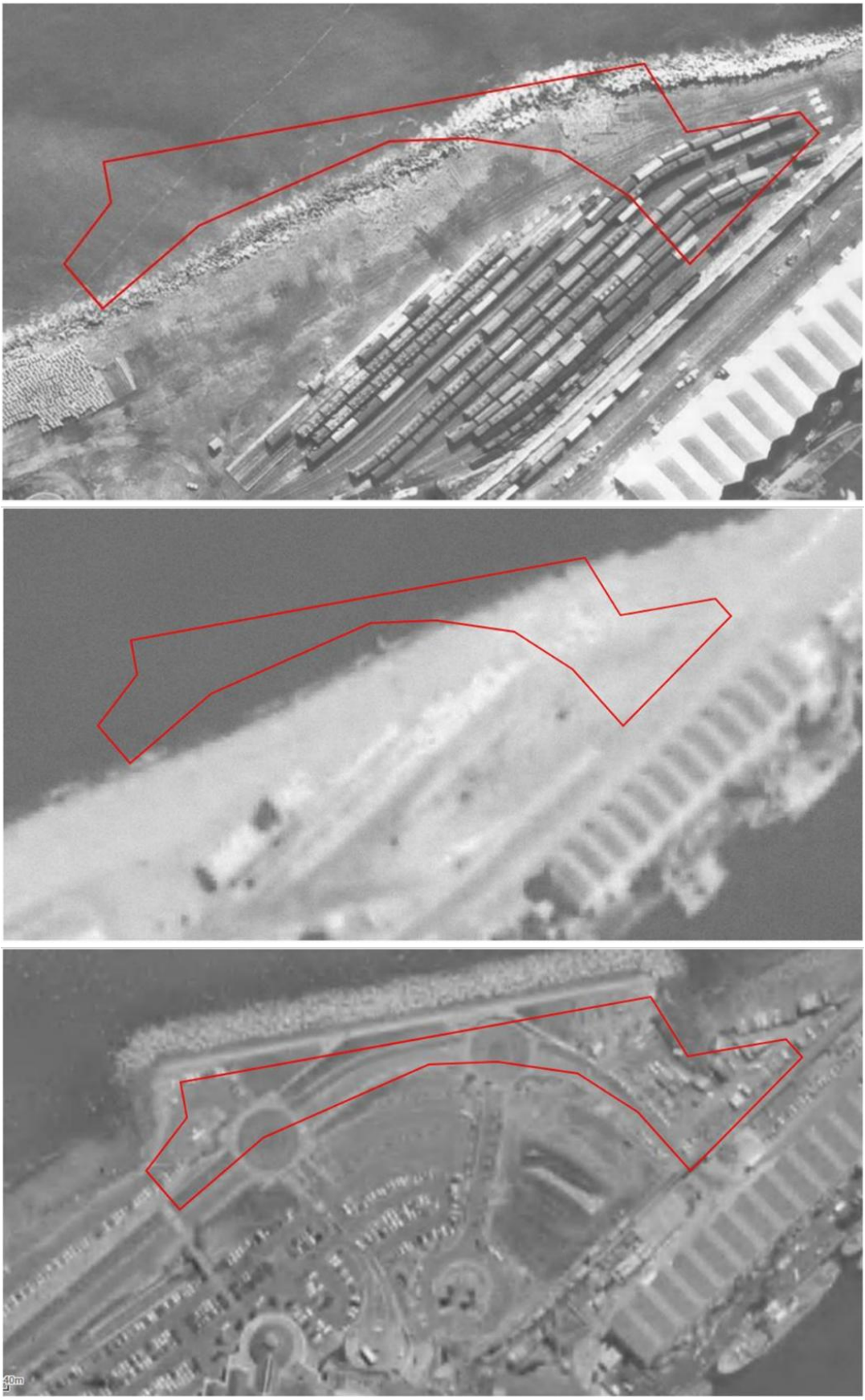

Figure 21. Top: 1980 historical aerial, the site is now partly reclaimed land, used for marshalling yards. Middle: 1988 historical aerial image of the site. Bottom: 1996 aerial, additional reclamation and the site's current usage now under construction.

7.2 Visual and Townscape Considerations

The V&A Waterfront is located on the edge of the city centre. Visually and in terms of townscape, Cape Town's location is defined by its position between mountain and sea. The V&A is located within a flattened coastal "band" along the sea edge, through which railway lines and the major highways have been threaded. While the V&A Waterfront is largely continuous with the city and its mountainous backdrop it has historically been seen from several clear viewpoints that form clear "moments" within the typical navigation of the wider extent of the city.

7.2.1 The Local Setting of the V&A: Field of View

A common historical view, and one that remains accessible to the public and visitors and significant to the site, is from Signal Hill (Figure 22). Photographs of the site have been taken here from the 1880s, when the harbour was under construction, which show how the site, and surrounding area, have developed through time to their current condition (Figure 23).

Figure 22. Due to the convex form of Signal Hill, the V&A Waterfront cannot readily be perceived together with the city when viewed from the south. (Source: Google Streetview).

Figure 23. The V&A Waterfront seen from Signal Hill, in ~1880 (Top left; KAB AG 412), in ~1903 (Top Right; KAB R1647), and in late 2023 (Bottom).

Views of the V&A from outside the site are somewhat visually contained, largely because the site is located on a convex, outward promontory of land where Signal Hill meets the coastline, with the city and Atlantic Seaboard suburbs "tucked back" behind the site. This means that Signal Hill itself obscures views of the site from within the city and surrounds (Figure 22, Figure 24, and Figure 25). This also accounts for the fact that the most significant viewpoints of the site are from the sea (not widely experienced) and from the upper slopes of Signal Hill.

However, the breakwater, as a projecting element into Table Bay, can be seen from major approaches into the city from the east, namely Philip Kgosana Drive, Nelson Mandela boulevard and the elevated freeway, as well as High Level Road (Figure 26).

Figure 24. An example of one of the many promotional photographs of Cape Town taken with the subject site in the foreground (outlined in red dashed line) and the city and encircling mountain range beyond. The development of the site will be discernible in these views. (Source: Outlook Travel - https://www.outlooktravelmag.com/travel-guides/africa/south-africa/western-cape).

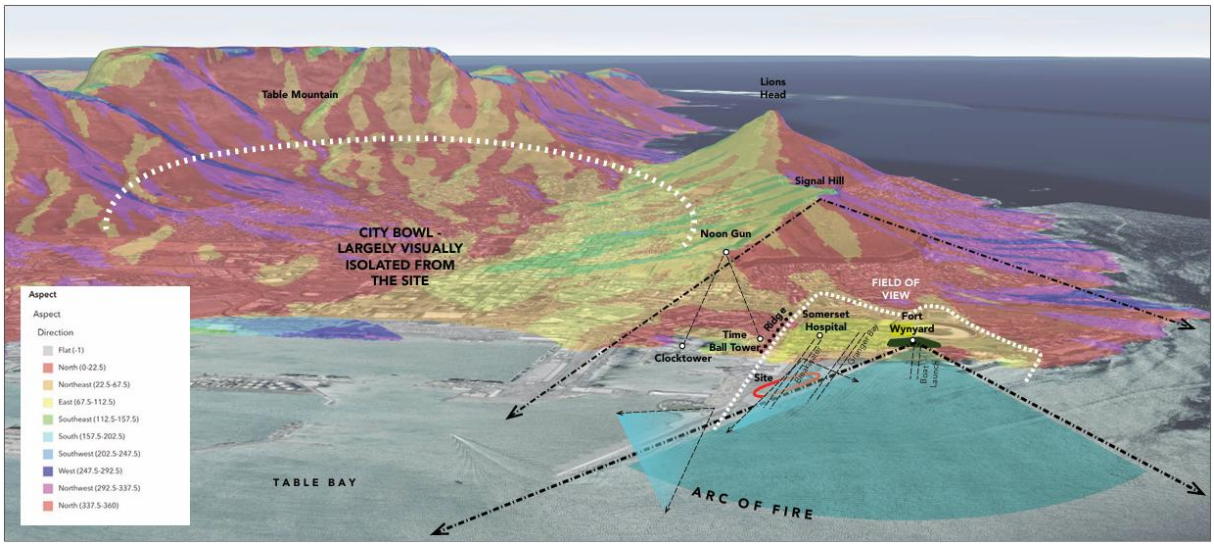

Figure 25. Field of view and outward vistas at the site. The mapping of the aspect onto the 3D landform clearly shows the relative visual isolation of the site from the City Bowl, as well as from the Atlantic Seaboard.

Figure 26. The V&A Waterfront as seen from: Philip Kgosana Drive incoming (Top Left), Woodstock (Top Right), High Level Road (Bottom Left), and the elevated freeway (Bottom Right).

7.2.2 Important Scenic Resources (Views) at the Scale of the Site

There are five important views within the wider precinct, two being historical and three more recently formed by the development of the V&A as a retail and commercial destination:

1. The Fort Wynyard gun battery, a Provincial Heritage Site that dates back to 1795, is built on a hillock overlooking Granger Bay, and as part of this protection, the "arc of fire" – a visual cone from the manned areas on top of the fort – was also protected (Figure 27).

Figure 27. The view from Fort Wynyard across Table Bay is protected. (Source: David Hellig and Abrahamse, July 2014).

2. The views achieved from the Breakwater Wall are historic, and allow for a connection between the bay and the mountain (Figure 28).

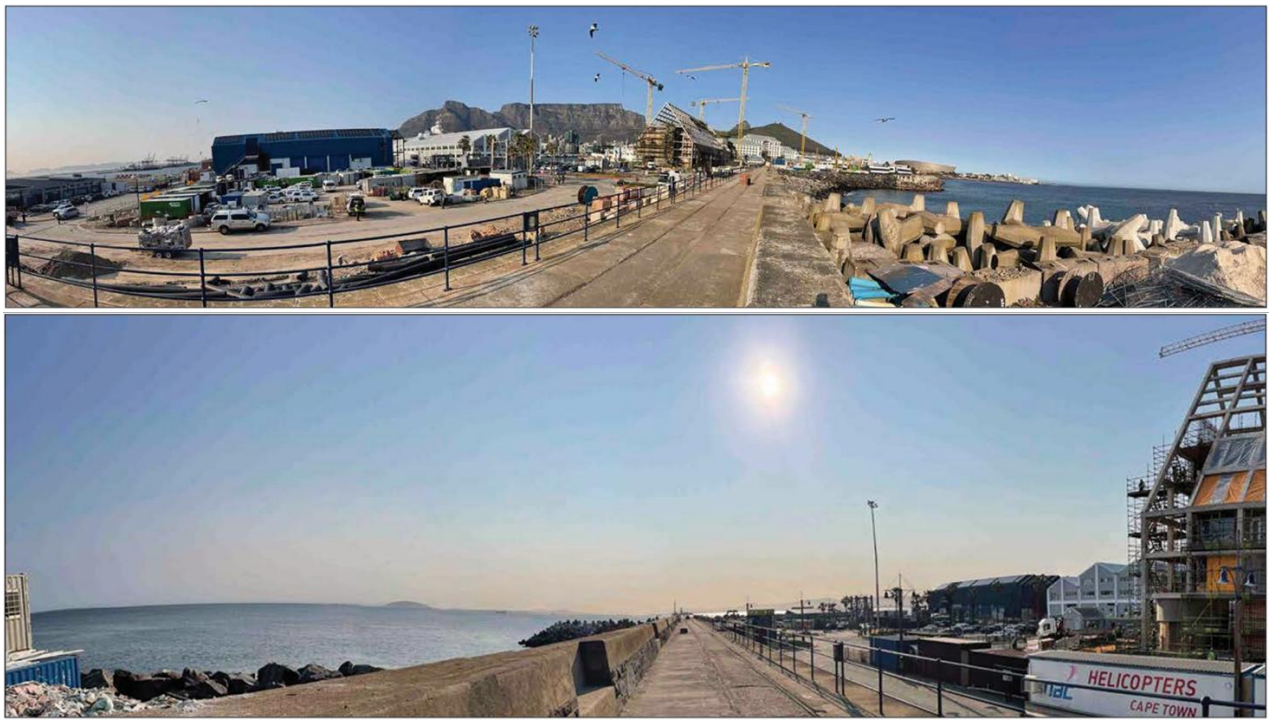

Figure 28. Top: Views attained from the Breakwater allow for strong visual connections between Table Bay and the Mountain Range - key to Cape Town's sense of place. Bottom: Views from the Breakwater Wall towards Table Bay allow for a sense of placement and orientation within the bay.

3. The view along Dock Road and across towards Granger Bay is also noted as significant. However, the construction around Granger Bay (temporary parking structures) has diluted it somewhat.

4. On Breakwater Boulevard, the expansive view northwards across Table Bay and towards Robben Island, once passing the Granger Bay Parking Structure, is also significant in allowing for views towards the sea. The Victoria Wharf mall forms a backdrop "spine" that pivots the view and viewer slightly northwards (Figure 28 and Figure 29).

Figure 29. At the mid-point on Breakwater Boulevard, views open westwards and the dolosse revetment becomes discernible as coastline.

5. Finally, a publicly-accessible view at the meeting point of East Pier and Quay 7, after passing through the Breakwater Wall and looking across the Victoria Basin, is intended in Urban Design Frameworks for this area, but is not yet discernible due to the construction site (Figure 30).

Figure 30. Top: View from the circle at the roadway to the Table Bay Hotel. Although Signal Hill is covered in cloud in this image, the "frame" set up by the Quay 7 hotel building (under construction) and the Table Bay Hotel is evident. The promenade-like qualities of the walkway along the coastal edge are also apparent. Middle: View from the elevated coastal walkway in front of the Table Bay Hotel. Although Signal Hill is covered in cloud in this image, the "frame" to the subject site that is set up by the Quay 7 hotel building (under construction) and the Table Bay Hotel is evident. The promenade-like qualities of the walkway along the coastal edge are also apparent. Bottom: View from the Breakwater Wall looking over the site (with a basement being constructed). Signal Hill, the Cape Wheel and Cape Town Stadium are visible, as is Granger Bay. To the east, the Quay 7 Hotel blocks views towards Victoria Basin and Table Mountain.

7.2.3 The "Townscape" Setting of the V&A, and Identifying Major Character-Giving Elements

The townscape patterns of the V&A that are significant to this part of the site include:

- The location of the site at the waters' edge along Table Bay;
- The location of the site adjacent to the city centre;
- The location of the site below Signal Hill, and with the encircling Mountains of the City Bowl visible and providing a backdrop;

- The access provided to the water, with the more open experience of the sea along the Breakwater and at Granger Bay being a counterpoint to the shelter provided by the historic harbour basins;
- The development of the historic harbour around the Portswood Ridge, which is an important "edge" or "watershed" between the enclosed harbour around the basins, and the Bay itself along the Breakwater and wave-cut shelf in the vicinity of Somerset Hospital and Fort Wynyard, and in itself has a distinctive character;
- The linear arrangement of historic and maritime related buildings positioned parallel to the major Quays to facilitate the handling of cargo and freight, or along the Portswood Ridge, which naturally allowed them to take advantage of views over these open bodies of water or over the buildings on the lower level;
- The encircling Dock Road, with limited historic gateway points at Buitengracht, Ebenezer, Portswood Road and Beach Road and Granger Bay.
- The emphasis of historic elements as landmarks through this process, such as Somerset Hospital.
- • A generally consistent rhythm, grain and scale of the historic buildings and linkage spaces between them;
- The accessible quayside/water's edge, where buildings set back to allow for access to the water's edge (and historically to allow space for docking, loading/unloading and so on).

7.2.4 Summary of the Townscape and Visual Character of this Part of the V&A Waterfront

This precinct, whilst largely falling within the Periphery Area identified in the V&A's draft Conservation Management Plan (CMP) is framed directly to the west and east by Buffer Areas (that have some heritage constraints) and to the north by Table Bay. Consideration of contextually appropriate responses to these heritage considerations is important.

Other physical heritage assets and character elements in the area include New Somerset Hospital, Fort Wynyard, the Old Kings Warehouse, the Breakwater Wall, the water's edge (coastal walk, quay edges) the working components of the area, some of which are now redundant, including the cranes, and the berthing of the SA Agulhas II vessel. Many of the working harbour elements are embedded around the basins, but the cranes can be seen from the site, as are the large vessels passing the site *en route* to the harbour.

The Granger Bay and Breakwater side of the site consists largely of landfill and temporary land uses located in an ad hoc manner. There is little sense of townscape, and **the primary character component of any significance is the spatial and visual contact with the water's edge**.

The nature of public access to the water's edge has considerable socio-historical significance, as does the visual-spatial linkage of heritage resources in the immediate vicinity (such as Fort Wynyard, Somerset Hospital and the Breakwater) to the sea. The established elements of heritage significance and heritage informants for this part of the Precinct include:

- The Breakwater Boulevard as a visual axis, from Somerset Hospital to the sea.
- The historic Breakwater Wall, and the views obtained from it.
- The direct pedestrian engagement with the sea edge obtained along this part of the coastline.
- The expansive views over Table Bay and towards Robben Island that are achieved here.
- The site encompasses a key intersection of higher order spatial elements in this part of the City, and this must be responded to (Figure 31).

Figure 31. The site is located adjacent to the intersection point of two higher-order public space elements in this part of the city: the promenade and the Breakwater Boulevard visual-spatial corridor.

8 SOCIO/ECONOMIC ASPECTS

8.1	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.

8.1.1 Socio-Economic Context

The Victoria & Alfred (V&A) Waterfront is located in Ward 115, Table Bay District, the historic "heart" and economic centre of the city (Figure 32).

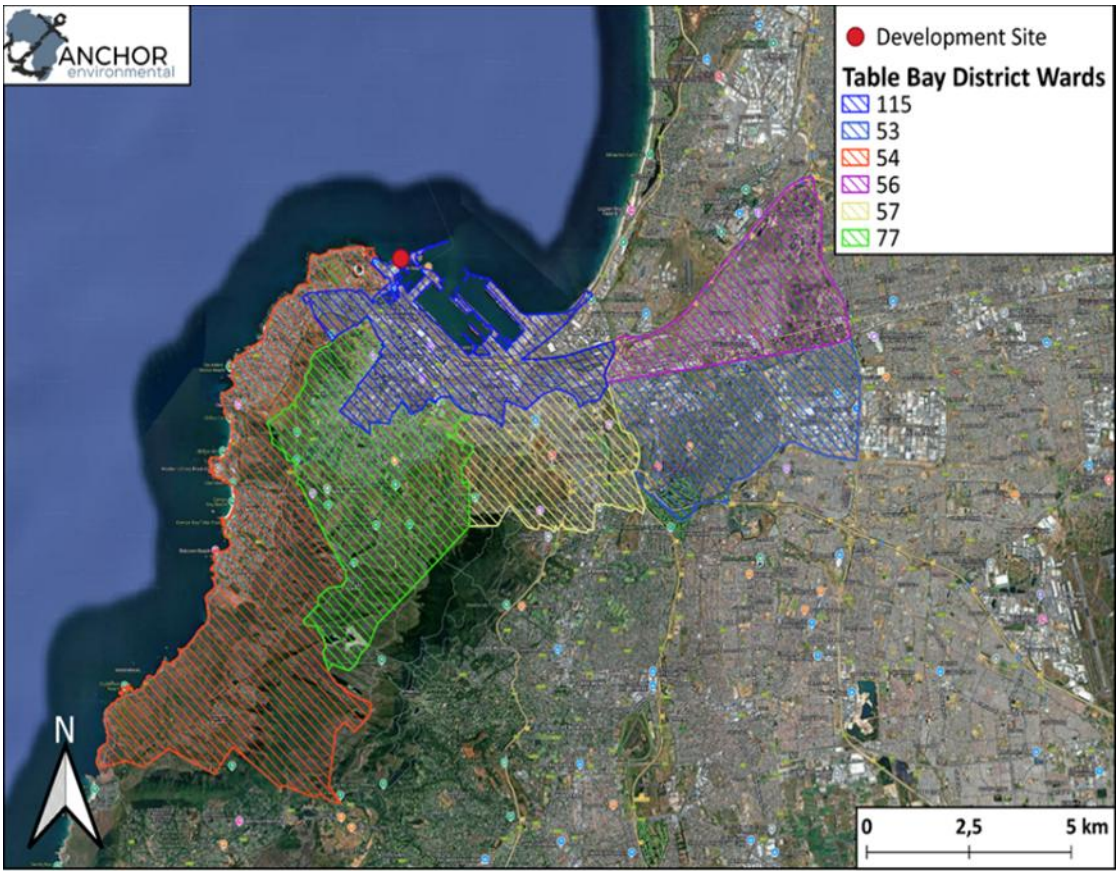

Figure 32. Locality of the Project site within Ward 115 of the Table Bay District.

The Table Bay District is a focal point for commerce, tourism, and urban activity. Within the Central City the V&A Waterfront borders 'Precinct 1: The Foreshore' which is not only the hub of the Central City's eventing and business tourism economies but is also the residential hub with more people living in this precinct than any other in the Central City (CCID 2025).

8.1.2 Population Dynamics

Between 2011 and 2022, the City of Cape Town experienced substantial population growth, increasing from 3.74 million to approximately 4.77 million, with households rising from 1.07 million to 1.45 million. The city's population is predominantly working age (70.9%), with a lower dependency ratio of 41%. Education and housing metrics improved over this period, with higher proportions of residents attaining tertiary education, living in formal dwellings, and having access to essential services such as electricity, piped water, and flush toilets. At the local level, the Table Bay District has a steady population and household growth, smaller household sizes, and an educated workforce, highlighting the area's potential for economic activity and demand for mixed-use developments.

8.1.3 TOURISM

The V&A Waterfront remains a cornerstone of the local and regional tourism economy. The proposed development site forms part of this highly visited and economically significant node, which consistently ranks among the top points of interest (POIs) for both domestic and international visitors (Figure 6.9). According to Wesgro's 2022 Cape Town Visitor Trends Report, the V&A Waterfront was the most visited attraction by both domestic and international tourists, with an average dwell time of 2.7 hours, indicating its sustained draw and economic value within the city's visitor economy (WESGRO, 2023). During the first quarter of 2025, six of Cape Town's major tourist attractions welcomed close to 984,000 international tourists with the V&A Waterfront being the most visited of the six attractions (Figure 33).

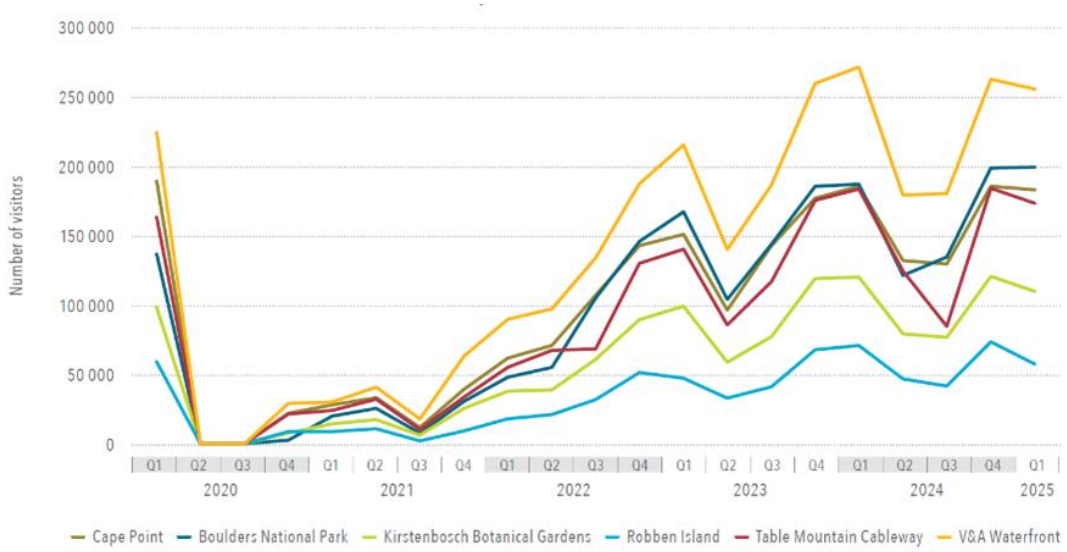

Figure 33. Number of International tourist visits to six tourist destinations of Cape Town, 2020 Q1 to 2025 Q1. Visitors to the V&A Waterfront is shown as the yellow line on the graph. Source: City of Cape Town 2025.

Tourism is a critical component of Cape Town's economy, with the V&A Waterfront serving as a key attraction and driver of visitor spending, employment, and broader economic linkages. The proposed development within this precinct is strategically positioned to support Cape Town's economic and demographic trends by providing mixed-use residential, commercial, cultural, and public spaces, enhancing tourism, creating jobs, and leveraging the skilled local workforce to stimulate sustained economic growth and urban vitality.

8.2 Explain the socio-economic value/contribution of the proposed development.

8.2.1 FINANCIAL CONTRIBUTIONS AND JOB CREATION DURING CONSTRUCTION PHASE

The construction-phase economic impacts of the proposed development were estimated using the total development cost of approximately R1.7 billion, applied as a proxy for capital expenditure associated with construction activities. It is assumed that the majority of this expenditure will be directed towards construction-related goods and services, including labour, materials, plant, and professional services. Industry-specific standard construction-phase multipliers were used to estimate employment, GDP and income impacts.

Total economic output supported by the construction phase is estimated at approximately R4.3 billion, including indirect and induced effects (Table 4). Of this total, approximately R2.6 billion

represents secondary (indirect and induced) economic activity generated through supply-chain linkages and household spending.

Table 4. Estimated economic impact during the construction phase of the proposed development. All rands in R million 2025.

Indicator	Direct	Indirect	Induced	Total
Economic output (R million)	1,712	1,541	1,027	4,280
Contribution to GDP (R million)	651	616	411	1,678
Total employment (jobs)	1,335	2,568	1,233	5,136
Skilled	267	514	247	1,027
Semi-skilled	601	1,156	555	2,311
Low-skilled/unskilled	467	899	431	1,798
Household income (R million)	342	308	205	856

The contribution to GDP is measured in terms of value added, which represents the net increase in economic value after accounting for intermediate inputs. The construction phase is estimated to generate direct GDP contribution of approximately R651 million over the construction period, and the total GDP contribution supported by the construction phase is estimated at approximately R1.7 billion, including indirect and induced effects (Table 4).

Based on typical construction-sector employment intensities in South Africa, the construction phase is estimated to support approximately 1335 direct job-years over the construction period. Total employment supported by construction activities is estimated at approximately **5136 jobs**, including indirect and induced employment. Based on the total estimated employment, approximately 20% of jobs are expected to be skilled, 45% semi-skilled, and 35% low-skilled or unskilled. **Together, these employment categories enable broad labour absorption during the construction phase, providing opportunities across different qualification and experience levels within the local workforce.**

In addition to direct on-site employment, the project will indirectly support jobs across a range of linked sectors through supply chain and expenditure effects. These include manufacturing of construction materials (e.g. cement, steel, bricks, glass, and fittings), transport and logistics services, plant and equipment hire, wholesale and retail trade, fuel supply, and professional services such as engineering, environmental consulting, legal, and financial services.

Direct household income generated during the construction phase is estimated at approximately R342 million. Total household income supported across the economy during the construction period is estimated at approximately R856 million, of which approximately R513 million represents indirect and induced income effects.

The construction phase is expected to result in a high positive but temporary socio-economic impact, reflected in substantial contributions to economic output, GDP, employment, and household income. While these impacts are time-bound and limited to the construction period, they represent a significant short-term stimulus to the local and regional economy.

8.2.2 Construction Phase Contributions Towards Government Revenues

Government revenue impacts arise through a combination of taxes, levies, and service charges generated during both the construction Capital Expenditure (CAPEX) and Operational Expenditure (OPEX) phases. These impacts occur at national, provincial, and local government levels. The socio-economic specialist utilised the total development cost of approximately R1.7 billion, as a proxy for CAPEX.

During the construction phase, government revenue is primarily once-off in nature and linked directly to capital expenditure and the associated economic activity generated by the project. At the national level, revenue is derived from VAT on construction materials and professional services, corporate income tax on profits earned by construction firms and their suppliers, and PAYE deducted from construction workers' wages. Additional fiscal inflows may arise from fuel levies associated with transport and logistics, as well as customs duties where imported materials or equipment are utilised. Given the scale of a R1.7 billion development, VAT and PAYE alone are likely to represent an important fiscal contribution during the construction period.

8.2.3 Financial Contributions and Job Creation during Operational Phase

The operational-phase economic contributions of the proposed mixed-use development were estimated using projected annual operating revenues and expenditures expressed in opening-year prices, and information on the likely number of rooms to be operational as part of the hotel and luxury residential apartment block. Gross operating revenue of approximately R148.0 million per annum was applied as a proxy for direct economic output, while operating expenditure of R48.7 million per annum represents intermediate inputs to the economy. Standard South African input-output multipliers for service-oriented activities were applied to estimate indirect and induced effects.

The operational phase is expected to generate direct output of approximately R148.0 million per annum (Table 7.2). The development is estimated to support total annual economic output of approximately R311 million, including indirect and induced effects. Of this total, approximately R163 million per annum is attributable to secondary (indirect and induced) economic activity within the wider economy.

Contribution to GDP, representing the net contribution to the economy after accounting for intermediate inputs, is estimated at approximately R99 million per annum, and the total contribution to GDP is estimated at approximately R159 million per annum, highlighting the development's role in adding net economic value to the regional economy (Table 5).

Table 5. Estimated economic impact during the operational phase of the proposed development. All rands in R million 2025.

Indicator	Direct	Indirect	Induced	Total
Economic output (R million)	148	70	93	311
Contribution to GDP (R million)	99	24	36	159
Total employment (jobs)	211	53	106	369
Skilled	42	11	21	74
Semi-skilled	95	24	47	166
Low-skilled/unskilled	74	18	37	129
Household income (R million)	44	13	17	74

Based on typical employment intensities for service-based developments such as the proposed mixed-use development which include hotel rooms and luxury residential apartments, the operational phase is estimated to directly support approximately 211 employment opportunities (Table 5). Direct jobs are created on-site for day-to-day operations and would include front desk, housekeeping, concierge, security, maintenance, administration, management, and hospitality staff. For service-oriented developments like hotels and luxury apartments, these operational needs are labour-intensive, so a single hotel or apartment building can generate a significant number of direct jobs relative to its size. Indirect jobs, by contrast, are in the supply chain and would include food and beverage suppliers, laundry services, utilities, contractors, maintenance firms, etc. The number of these jobs is typically proportional to the operational expenditure on goods and services, which is often less than the total labour needed on-site. Total employment supported by the development is estimated at approximately 369 jobs, including supply-chain and household-spending effects.

Direct household income generated during operations is estimated at approximately R44 million per annum with total income supported across the economy estimated at approximately R74 million per annum, of which approximately R30 million represents indirect and induced income effects. (Table 5).

The operational phase of the proposed development is expected to make a substantial positive contribution to the regional economy through sustained output generation, direct and indirect employment creation, household income support, and contribution to GDP. These impacts are ongoing in nature, representing longer-term socio-economic benefits relative to the short-term construction phase.

The estimates presented above are indicative and are based on standard South African input–output multipliers. Actual impacts will depend on factors such as the final operational arrangement in terms of the number of hotel rooms and number of residential units as well as procurement practices, the extent of local sourcing, and prevailing economic conditions at the time of operation. The results should therefore be interpreted as order-of-magnitude estimates intended to inform impact significance rather than precise forecasts.

8.2.4 Contributions Towards Government Revenues during Operational Phase

During the operational phase, government revenues become recurring and longer-term, often providing a more stable and sustainable fiscal contribution than the one-off inflows associated with construction. At the national level, revenue is generated through corporate income tax from hotel

operations and property management companies, as well as PAYE from permanent staff employed across the development. Value-added tax VAT collected on accommodation, food and beverage sales, retail, and service provision further contributes to national revenue. Dividends tax may also apply where profits are distributed to shareholders. With the development expected to generate annual turnover in the region of R148 million, VAT and PAYE are anticipated to provide consistent and predictable revenue streams each year.

At the local government level, operational revenue arises primarily through property rates, which can be substantial for high-value luxury apartments, as well as municipal service charges for water, electricity, refuse, and sewerage. Additional revenues may include tourism levies, where applicable, and business licensing fees. Collectively, these operational-phase fiscal contributions reflect the long-term benefits of the development to both national and local government budgets, supporting municipal services and regional economic stability.

8.2.5 Contributions to Skills Development during Construction and Operational Phase

The development is anticipated to contribute towards skills development during all phases. The creation of many jobs ~5136, of all skill levels, during construction will create valuable opportunities for workers to gain experience and to continue to upskill themselves, with the potential of increasing their economic situation, and leading to knock-on opportunities.

Ongoing employment opportunities during the operational phase will provide a platform for local skills development across multiple sectors. Positions in hospitality including front-of-house staff, cleaners, kitchen personnel, and guest services alongside roles in facilities and property management, such as building maintenance, security, and administration, offer entry points into the formal labour market and the chance to acquire practical, transferable skills.

Specific opportunities for skills development include on-the-job training in customer service, sales, stock control, and digital point-of-sale systems; front-desk and guest service competencies in hospitality and short-term accommodation; and basic facilities and property management skills for operational staff. The development may also provide workplace exposure for students, interns, or trainees. By facilitating these experiences, the project can strengthen local workforce readiness, enhance career progression, and contribute to the growth of Cape Town's urban services economy. These outcomes are particularly valuable for youth and first-time job seekers in surrounding communities, supporting broader regional goals of employability and skills development.

8.2.6 Contributions Towards Public Open Space and Amenity Value during Operational Phase

The inclusion of Atlantic Park within the proposed mixed-use development is expected to generate a sustained positive impact by enhancing open space and amenity value for the precinct and the wider community. Strategically located at the junction of the Promenade, Breakwater Boulevard, Victoria Wharf Shopping Centre, and the pedestrian link connecting Table Bay Square to the proposed Atlantic Park, the park provides a highly accessible public space at promenade level. Visitors and residents will be able to enjoy expansive views of the ocean and the mountain to the south, as well as the broader Granger Bay area. By offering a landscaped, open environment for recreation, relaxation, and social interaction, Atlantic Park complements existing V&A Waterfront buildings and open spaces while strengthening the pedestrian experience. The park, together with a widened nine-metre Promenade, improves connectivity and visual access to the water, contributing to the aesthetic quality of the area and supporting the long-term cultural, recreational, and economic vitality of the precinct. These features are especially important in densely built urban areas where public open space is scarce.

Research suggests that public open spaces offer numerous benefits, and Atlantic Park is well-positioned to deliver these within the high-density V&A Waterfront precinct. By providing accessible green space with ocean and mountain views, the park will support physical and mental well-being, offer opportunities for recreation and leisure, and create a venue for social interaction and community events. Environmentally, the park contributes to urban cooling, enhances biodiversity, and improves the aesthetic quality of the area. Economically, attractive public spaces such as Atlantic Park can increase surrounding property values, stimulate visitor spending, and complement the commercial and cultural activities of the area.

8.2.7 Contributions Towards Sense of Place during Operational Phase

The preferred development option is expected to result in a positive impact on sense of place by introducing a high-quality, publicly accessible waterfront environment that strengthens visual and physical connections to the sea. The development will enhance the character and identity of the area through the creation of an active promenade, improved public realm and sensitively designed urban form that responds to its coastal setting. While changes to the existing townscape will occur, these are considered low in intensity and largely confined to the immediate and local context, with benefits arising from increased accessibility, amenity and urban cohesion.

8.2.8 Contributions Towards the Visitor Economy during Operational Phase

The operation of the proposed mixed-use development is expected to provide a sustained positive impact on the visitor economy by attracting additional domestic and international visitors to the area. The inclusion of a hotel, luxury apartments, retail spaces, dining outlets, and public amenities such as Atlantic Park will create a vibrant destination that encourages longer stays and increased visitor spending. Visitors will generate economic activity not only through accommodation and food services on-site but also through retail, entertainment, transport, and leisure activities in the surrounding precinct. By enhancing the attractiveness of the V&A Waterfront area as a high-quality, accessible urban destination, the development will support local businesses, strengthen tourism-related supply chains, and contribute to Cape Town's broader visitor economy over the long term.

8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.

The economic contributions of the proposed development are expected to contribute to social uplift—particularly through the creation of ~5136 short-term job opportunities during the construction phase, and ~369 longer-term jobs during the operational phase—and the resultant contributions to/increases in household incomes. The development's contributions towards GDP, and the City's increased revenues from tax and increased rates (due to the likely increase in surrounding property values) should result in further benefits for the people of Cape Town. These increased revenues are anticipated to be largely driven by the bolstering of the City's tourist economy, and increased visitor spending, emanating from the development.

However, the above benefits are more "indirect" in nature, and do not directly address the project's predicted improvements for the community(s) residing within/experiencing the surrounding area. The anticipated, more "direct", benefits of the proposed development in terms of uplifting the surrounding community/area, and addressing relevant local needs, include the following:

- Increased residential capacity within a high-value area with limited existing capacity;
- Access to luxury hotels;
- Creation (and thus access to) amenities, including

- New, high-end, retail/commercial spaces—which should be desirable for the (predominantly wealthy) residents living in proximity of the site.
- Public open spaces—Atlantic Park and the Upgraded Promenade—which should increase the area's cultural value and allow for more inclusive access to a part of the city with very high historical, heritage, cultural, and aesthetic value.

The prior benefits are further expected to collectively result in positive impacts/improvements to the area's sense of place, and thus it's desirability for both existing, and prospective, residents, and tourists, alike.

Finally, the development, and the local benefits already identified, are expected to result in increased local property values, and increase the value of existing property owner's investments (although it's important to note that this will also result in increased municipal rates).

In summation, the proposed development is expected to be significantly beneficial in terms of addressing the needs and uplifting both people within the surrounding community, and within Cape Town more broadly.

8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.

According to the Socio-Economic specialist assessment (Appendix G1), the proposed development could possibly result in three negative impacts relevant to people's health and wellbeing during the construction phase. These impacts are all considered to be of "**Very Low**" significance with the implementation of appropriate mitigation (see Section 4.3.2 and Section 4.3.4 in Section H below). These mitigation measures are classified as essential and are therefore mandatory for implementation.

A description of these potential negative impacts, as well as the proposed mitigation measures proposed by the specialist, is detailed as follows:

These potential impacts have informed the proposed development primarily through the incorporation of standard construction-phase mitigation measures and management controls, rather than requiring changes to the overall development layout or design.

8.2.9 Negative Impact Associated with Potential Noise and Dust Pollution

The construction phase will result in temporary increases in noise and dust due to site clearance, excavation, material transport, and general construction activities. These impacts are typical for projects of this nature, are localised, and short-term in duration. While they may be noticeable to nearby receptors, including buildings approximately 60 m south of the site (predominantly parking-related uses), impacts are expected to remain limited to the immediate construction area.

With the implementation of standard mitigation measures, these impacts can be effectively reduced to "**Very Low**" significance.

Overall, these impacts are temporary, confined to the construction phase, and are not expected to result in long-term effects on health, well-being, or surrounding land uses.

Essential (mandatory) mitigation measures are as follows:

- Ensure full compliance with all relevant national and municipal policies, regulations, and guidelines regarding noise and dust management, particularly when working near roads, sensitive receptors, and existing infrastructure.
- Implement regular cleaning and maintenance of the construction site to prevent dust accumulation on surfaces, access roads, and surrounding areas.
- Cover or securely store loose construction materials, soil, and debris to prevent windblown dust.

8.2.10 Negative Impact Associated with Physical Health and Safety Concerns

The construction phase of the proposed development may present potential physical health and safety risks for workers, site visitors, and the surrounding community. These include occupational hazards such as falls, machinery accidents, and exposure to dust, noise, and construction-related materials, as well as public safety risks from falling debris, site traffic, and uncontrolled access. While these impacts are typically short-term and confined to the construction phase, they do require careful management through strict adherence to the implementation of standard construction-phase mitigation measures. **With these precautions in place, the risks can be effectively minimised to "Very Low" significance, ensuring a safe environment for workers and the public.**

Essential (mandatory) mitigation measures are as follows:

- Adhere to occupational health and safety regulations as per the Health and Safety Plan for the project.
- Use personal protective equipment, implement site access controls, and dust and noise mitigation measures.
- Ensure regular safety training for personnel on site as per the health and safety plan.

8.2.11 Negative Impact on Sense of Place (Visual Resources)

During the construction phase, the visual character of the site and its surroundings will be temporarily altered, which may negatively affect the sense of place for nearby residents, visitors, and users of the V&A Waterfront precinct. Construction activities, including the presence of scaffolding, cranes, machinery, stockpiles of building materials, and temporary fencing, can create visual clutter and reduce the aesthetic quality of the area. Views to and from the waterfront, as well as sightlines of adjacent public spaces and heritage features, may be partially obscured, diminishing the overall visual experience. Although these impacts are temporary and confined to the construction period, they may affect the enjoyment of the public realm, the perceived attractiveness of the precinct, and the local identity during this time. However, it is important to acknowledge that the current character of the site is already impacted by construction works on the immediately adjacent land parcels.

These impacts can be effectively managed through standard construction-phase mitigation measures and good site management practices.

Essential (mandatory) mitigation measures are as follows:

- Limiting construction to within boarded areas;
- Site rehabilitation and management following completion of the works; and
- Preservation of elements to be retained, such as existing palm trees in the central street island.

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

1 DETAILS OF THE ALTERNATIVES IDENTIFIED AND CONSIDERED

1.1.	**Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.**

Provide a description of the preferred property and site alternative.

The preferred property (Erven 158570 RE, 149294 RE, 177854 and 179076) is located within the Breakwater Precinct of the V&A Waterfront, adjacent to the Port of Cape Town and the V&A Waterfront Harbour, and north of the Table Bay Hotel (Figure 34).

The site is located within a highly transformed and well-established urban environment on reclaimed land and is already serviced by existing infrastructure and integrated into the surrounding road and services network. The area is zoned Mixed Use 3 (MU3) and is currently used for a combination of overflow parking, container storage, construction-related activities, roads, landscaped areas, and associated urban infrastructure.

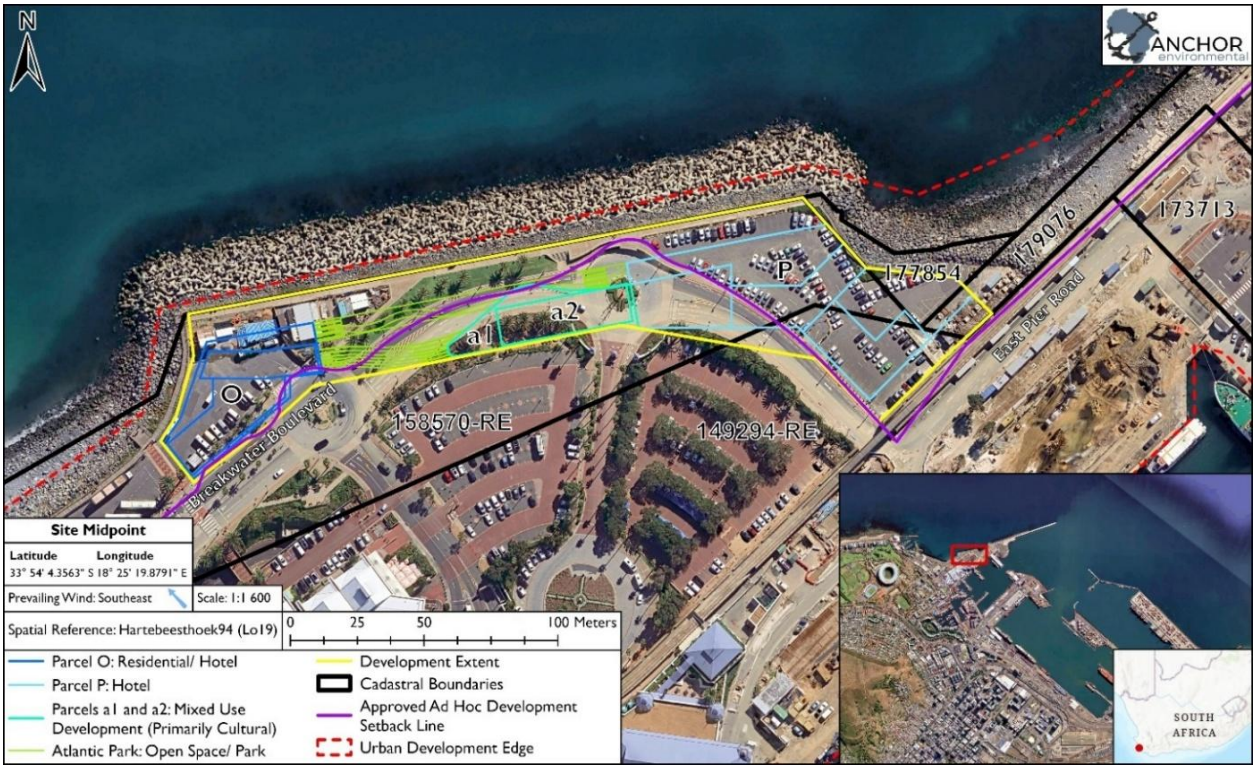

Figure 34. Location of the proposed mixed-use development on Erven 158570 RE, 149294 RE, 177854 and 179076 within the V&A Waterfront, Cape Town. The original layout and land use of the site are also visible, including existing infrastructure such as roads, parking areas, landscaped lawns with palm trees, and storage containers.

Provide a description of any other property and site alternatives investigated.

No alternative site or property was assessed or considered necessary, as the proposed development is location-specific and designed to make use of existing infrastructure and available space within an already established and highly transformed urban precinct that has historically been earmarked for development and already accommodates mixed-use development and supporting infrastructure.

Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix.
The site is situated within a highly transformed and well-established urban environment characterised by a mix of commercial, residential, industrial, and tourism-related land uses. It is already serviced by existing infrastructure, including roads, stormwater systems, pedestrian walkways, and landscaping, and is well integrated into the surrounding area, with direct access from Breakwater Boulevard. The proposed development is considered appropriate for this location, as it aligns with the existing mixed-use character of the V&A Waterfront and introduces a compatible mix of residential, commercial, and public spaces. Its location within an established urban node limits pressure on sensitive or undeveloped areas, while any potential coastal, heritage, or visual impacts can be managed through mitigation. The site is located on reclaimed land that was historically created for development purposes and has long been earmarked for such use. It is zoned Mixed Use 3 (MU3), and the proposed land uses are consistent with this zoning. The site is currently used for overflow parking, container storage, and construction-related activities, and its redevelopment will optimise the use of available space and existing infrastructure. The site is also well positioned to support economic activity, tourism, and public benefit, given its proximity to the coastline, established tourism areas, the city centre, and major transport routes. **Overall, the preferred site represents the most suitable option as it is already highly transformed, appropriately zoned, well serviced, and capable of supporting the proposed development with minimal environmental impacts, while optimising urban and public benefit.**
Provide a full description of the process followed to reach the preferred alternative within the site.
The full extent of the site is being utilised /redeveloped to optimise the use of available space and existing infrastructure. The proposed development envelope has been shaped by established height, form, and setback requirements identified during earlier planning, engineering, and heritage assessments. The Urban Design informants (March 2026) document which forms part of the Heritage Impact Assessment (HIA) describes the factors in some detail (Figure 35). To summarise these, include: • The view axis down Breakwater Boulevard linking Somerset Hospital and the Atlantic Ocean to be maintained from the level of Beach Road, buildings should not protrude into this corridor above (12.5MSL) • A 10m wide heritage related building setback from Breakwater Wall. • Sensitive area: Public experience of the Breakwater Boulevard view corridor and connection point to the public promenade. This area prioritises the visual & physical experience of the ocean • Seamless pedestrian connections between existing and proposed buildings and spaces • Development setback from the coastal edge by means of a public promenade. The proposed promenade in this area is at a current height of 8.5m above MSL (the existing pedestrian zone is at 7.7m MSL) and set back 9 - 10m from the back of the dolosse revetment. Behind this, the podium to buildings is proposed to step up to 10m above MSL or less with the total setback for buildings being 18m from the back of the dolosse revetment. No habitable spaces are proposed within this podium zone. The front face of this level change will include an engineered retaining wall to withstand storm surges in extreme weather. • Building heights to cascade down towards the ocean. • Building edges located along the Breakwater Wall to step back appropriately. • Tallest built area in the precinct to be located along Breakwater Boulevard & abutting the Table Bay Hotel • Building heights to cascade down towards the ocean

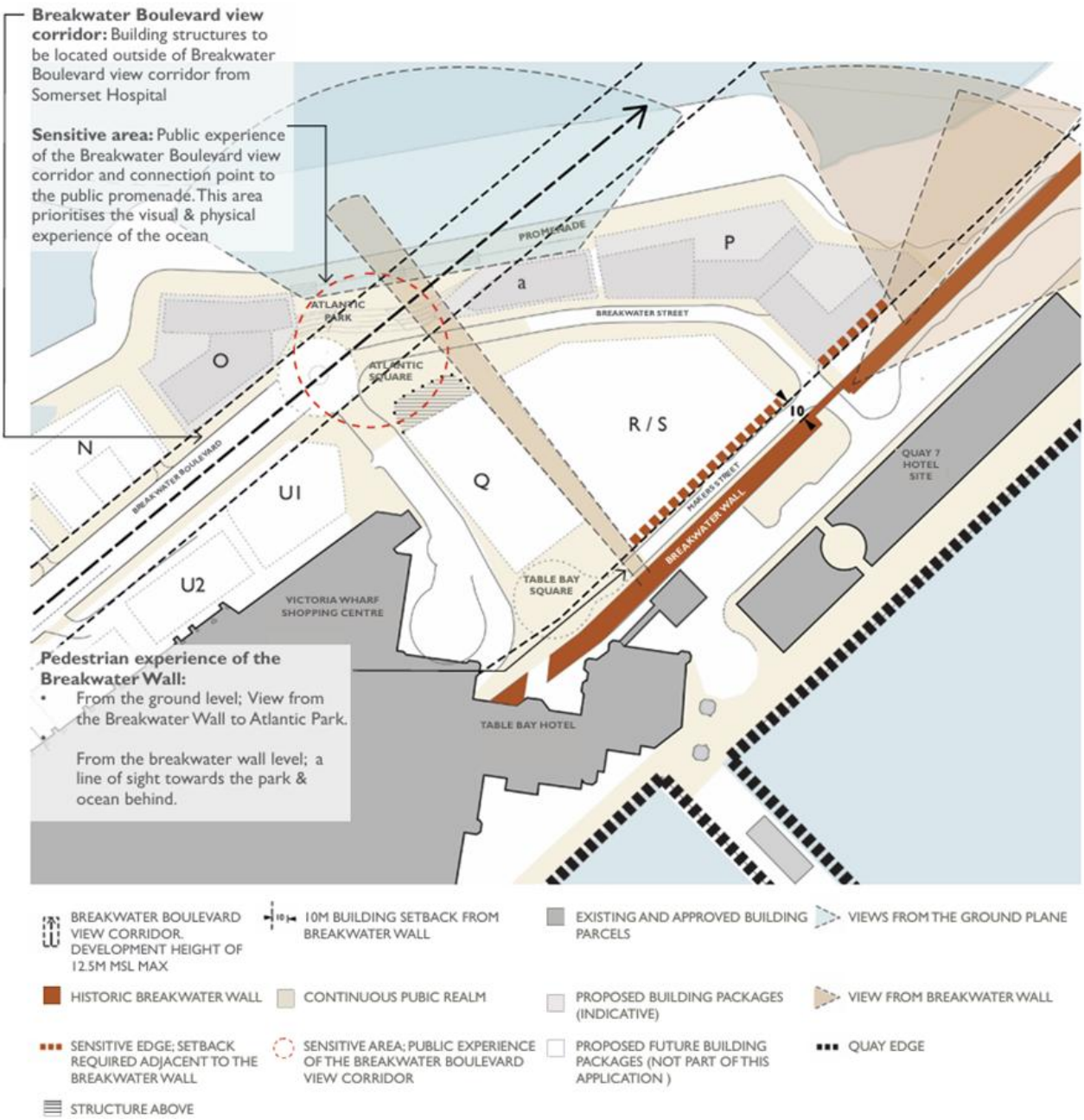

Figure 35: Design fixes diagram from Urban Design Informants document (March 2026).

Provide a detailed motivation if no property and site alternatives were considered.

No alternative site or property was assessed or considered necessary, as the proposed development is location-specific and designed to make use of existing infrastructure and available space within an already established and highly transformed urban precinct that has historically been earmarked for development and already accommodates mixed-use development and supporting infrastructure. Using this site further avoids the need to develop undeveloped or environmentally sensitive areas. The proposed development can therefore be accommodated within the existing urban footprint without resulting in unacceptable environmental impacts or requiring the development of undeveloped or environmentally sensitive areas. As such, no additional environmental benefit or meaningful impact mitigation would be achieved through the assessment or utilisation of alternative sites.

Further motivation for not considering alternative properties or sites is provided below:

Property Ownership: The V&A Waterfront owns the larger precinct, most of which has been intensively developed for mixed-use purposes, with the exception of the northern and eastern-most side of the precinct (i.e. the Breakwater and Granger Bay Precincts), which remain underutilized.

Existing Infrastructure and Access: The V&A Waterfront intends to develop both precincts over time. Phase 1A of the Breakwater Precinct is currently under construction and is located adjacent to the preferred site. Developing next to the existing Phase 1A construction area is the most feasible option, as it allows for the use of existing roads, infrastructure, and construction site offices. The preferred site is already a brownfield area currently used for parking, making the development of alternative sites illogical.

The adjacent Granger Bay Precinct is subject to a separate environmental impact assessment application, which involves a longer process and is encumbered by multiple administrative requirements. Consequently, the preferred site represents the most logical location for development.

Optimal Zoning: The site is favourably zoned as Mixed Use 3 and is adjacent to other compatible land uses.

Pre-Identified Low Sensitivity: The preferred site is situated in a degraded, previously disturbed area with low ecological sensitivity, eliminating the need to identify alternative sites.

Based on the above, the preferred site is considered the most practical, appropriate, and environmentally suitable location for the proposed development, and the assessment of alternative properties or sites was therefore not considered necessary or taken forward for assessment in this Basic Assessment process.

List the positive and negative impacts that the property and site alternatives will have on the environment.

PREFERRED ALTERNATIVE

Construction Positive:

- Positive impact on gross output and GDP
- Positive impact on employment
- Positive impact on household income
- Positive impact on government revenues

Operational Positive:

- Positive impact on gross output and GDP
- Positive impact on employment
- Positive impact on household income
- Positive impact on government revenues
- Positive impact on skills development
- Positive impact on public open space and amenity value
- Positive impact on the visitor economy
- Positive impact on sense of place (visual), and townscape resources.

Construction Negative:

- Negative impact associated with noise and dust pollution
- Negative impact associated with physical health and safety concerns
- Negative impacts upon maritime archaeological and/or submerged pre-colonial archaeological heritage resources
- Negative impact on sense of place (visual), and townscape resources.
- Negative impact of pollution on the marine environment

Operational Negative:

No negative impacts have been identified for this phase.

Overall, the preferred alternative is expected to result in strong net positive socio-economic outcomes and improvements to sense of place, visual character, and townscape quality, with multiple benefits during both the construction and operational phases. Negative impacts are limited to short-term, localised construction-related effects that can be effectively managed through mitigation, with no operational negative impacts identified.

1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred activity alternative.

The preferred activity alternative is the development of a mixed-use urban precinct that combines residential, hotel, cultural, and public open space uses within a single integrated development.

The site is intended to support a combination of residential accommodation and hotel or tourism-related uses on Parcels O and P. These uses are focused on providing places for people to live and stay within the V&A Waterfront precinct, supporting its role as a key tourism and urban destination. Parcels a1 and a2 are intended for cultural and public-focused uses.

These may include facilities that support education, culture, or visitor experiences, with the possibility of limited supporting uses such as retail where appropriate. In addition, the development includes a new public open space (Atlantic Park) and an upgrade of the existing promenade. These areas will provide space for public use, recreation, and enjoyment of the waterfront environment.

Detailed descriptions of the proposed use of each parcel are provided below:

Parcel O: Residential/Hotel (+/-100 units)

Residential apartments and / or hotel rooms in a key location alongside Atlantic Park, north facing and fairly private location long the seafront. The building's proximity to the promenade will allow for public amenities with a focus on the ocean economy.

Parcel P: Hotel

Building P is planned as an hotel and/or apartments, with approximately 60-80 hotel rooms and/or apartments. The site is somewhat isolated at the end of the existing seawater revetment. The hotel would enjoy north aspect views over the Atlantic, and within close proximity of Victoria Wharf shopping centre and helipad to the east. Ground Floor of the Hotel at Building P would be a restaurant attraction or similar.

Parcel a1 & a2: Mixed Use (Primarily Cultural)

Parcels a1 and a2 are relatively small parcels and will accommodate a mixed-use proposal suitable for cultural and educational facilities. The upper levels of the a2 portion could include restaurant, hotel or residential facilities.

Atlantic Park: Open Space/Park

The park is proposed at a key junction between the Promenade end, Breakwater Boulevard, Victoria Wharf Shopping Centre and the pedestrian link between Table Bay Square, as well as the proposed Atlantic Park. The open space, at the level of the promenade, offers views of the ocean and mountain to the south, and of the broader Granger Bay area. This is planned to be an accessible space for the

public to enjoy and complements the surrounding V&A buildings in the precinct. The Promenade will also be widened to approximately 9 metres.

The infrastructure and services required to support the proposed uses are described below.

Services

General Pipeline Infrastructure

The proposed development will utilise existing approved bulk development rights, and the CoCT have confirmed that there is sufficient capacity in the networks. No additional bulk pipelines (freshwater, wastewater, sewage, etc.) are to be laid as part of this project. Existing pipeline infrastructure is located within the Breakwater Street, adjacent to the proposed site.

Solid waste

The proposed development will produce typical construction-related waste, during the construction/ development phase. While the type and quantity of the waste cannot be reported on at present, these are not expected to exceed thresholds for licensing.

The type of waste to be produced during the operational phase will be typical of residential, commercial, and retail land uses, however volumes cannot be reported on at present. No hazardous waste production is anticipated, and volumes cannot be reported on at present. Solid waste will continue to be processed through the V&A Waterfront's established waste-handling facilities,

Wastewater/ Sewage

Effluent of approximately 44 m^3/day will be produced from the development and will be typical of effluent produced from residential and commercial land uses during operation. The effluent will be conveyed through existing bulk sewer infrastructure to the Green Point Marine Outfall Pipeline.

Water

The proposed development will require water during both the construction and operational phases, with non-potable water being utilised during construction, and potable (drinking quality) water will be utilised during the operational phase. Once operational, the development will requirement for 39m^3 /day of potable water, which will be drawn from the municipal water supply, and supplemented by the V&AW licensed desalination plant as required. This is in alignment with the V&AWs long-term objective to reduce reliance on the City of Cape Town for their water supply. This will be implemented in a phased manner, with the objective of eventually relying on the City's mains connections to the V&AW for critical situations only. In this regard, the V&AWs Desalination Plant (located outside the application site area on V&AW owned property) has been designed to meet current water demands, and to cater for future growth of the property, including the application site.

Electricity

The CoCT is the local electrical supply authority. The V&AW has engaged with the City's Electricity Dept., who confirmed that there is sufficient capacity within the City's network to service the anticipated demand for the precinct. The anticipated electrical loads, and programming for the planning, roll- out and placement of the CoCT Unigear substation building to be agreed with the department. As part of the design development phase of the project, renewable energy sources (solar) will be explored.

Overall, this activity alternative brings together residential, tourism, cultural, and public space uses in one development, in line with the established mixed-use nature of the V&A Waterfront precinct and is therefore the preferred alternative.

Provide a description of any other activity alternatives investigated.

During the conceptualisation phase, different scenarios were considered in terms of variations in the mix of residential, hotel, cultural, and mixed-use activities on the site. These included different proportions and combinations of uses across the development. However, the current proposal represents the most appropriate and workable option for the site and has therefore been selected to be assessed as part of the BA process. As a result, no other activity alternatives are considered necessary for this development.

Provide a motivation for the preferred activity alternative.

Due to the location and planning context of the site, the area has been earmarked for mixed-use development, including residential, hotel, and associated commercial uses. As a result, the range of feasible activity alternatives is limited to land uses that are compatible with the surrounding V&A Waterfront precinct and its established urban character.

During the conceptualisation phase, different scenarios were considered in terms of the mix and layout of residential, hotel, and mixed-use components. The proposed development represents the preferred option as it makes the most efficient use of the site, provides the most appropriate socio-economic benefits, and supports a balanced mix of uses within a high-demand urban tourism and mixed-use node. In this context, the combination of uses is expected to support ongoing economic activity, employment creation, the visitor economy, and the efficient use of this strategically located urban site.

The combination of residential, hotel, cultural, and public open space uses further aligns with the established role of the precinct and fits with surrounding land uses and public spaces. It improves pedestrian access to the promenade and surrounding areas, creates better quality public spaces, improves the overall experience of the area for residents and visitors and strengthens the existing mixed-use character of the V&A Waterfront.

In conclusion, the proposed development represents the preferred option as it makes the most efficient use of the site, provides the most appropriate socio-economic benefits, and supports a balanced mix of uses within a high-demand urban tourism and mixed-use node.

Provide a detailed motivation if no activity alternatives exist.

Different scenarios were considered during the conceptualisation phase, including variations in the mix and layout of residential, hotel, and mixed-use components. However, the current scenario represents the preferred option as it makes the most efficient use of the site, provides the most appropriate socio-economic benefits, and delivers a balanced mix of uses within a high-demand urban tourism and mixed-use node. Furthermore, under the current scenario, all identified environmental impacts can be satisfactorily mitigated to acceptable levels, while the development continues to provide notable socio-economic and public benefits.

As such, no additional activity alternatives were identified or taken forward for assessment in this Basic Assessment process.

List the positive and negative impacts that the activity alternatives will have on the environment.

The activity, design, layout, and operational alternatives are interrelated and were therefore assessed in an integrated manner. As a result, the positive and negative impacts identified for the property and site alternatives are the same as those for the activity alternatives, as these were not assessed separately. For ease of reference, the impacts are therefore repeated below.

PREFERRED ALTERNATIVE

Construction Positive:

- Positive impact on gross output and GDP
- Positive impact on employment
- Positive impact on household income
- Positive impact on government revenues

Operational Positive:

- Positive impact on gross output and GDP
- Positive impact on employment
- Positive impact on household income
- Positive impact on government revenues
- Positive impact on skills development
- Positive impact on public open space and amenity value
- Positive impact on the visitor economy
- Positive impact on sense of place (visual), and townscape resources.

Construction Negative:

- Negative impact associated with noise and dust pollution
- Negative impact associated with physical health and safety concerns
- Negative impacts upon maritime archaeological and/or submerged pre-colonial archaeological heritage resources
- Negative impact on sense of place (visual), and townscape resources.
- Negative impact of pollution on the marine environment

Operational Negative:

No negative impacts have been identified for this phase.

Overall, the preferred design alternative is expected to result in strong net positive socio-economic outcomes and improvements to sense of place, visual character, and townscape quality, with multiple benefits during both the construction and operational phases. Negative impacts are limited to short-term, localised construction-related effects that can be effectively managed through mitigation, with no operational negative impacts identified.

1.3.	Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts

Provide a description of the preferred design or layout alternative.

The project involves the redevelopment of the site (portions of Erven 158570 RE, 149294 RE, 177854 and 179076) into a mixed-use precinct. It will comprise three primary development parcels, namely Parcels P, O, and a1 &a2, as well as the expansion of the existing promenade and the creation of a new public open space, Atlantic Park (Figure 36). The site is intended to support a combination of residential accommodation and hotel or tourism-related uses on Parcels O and P. These uses are focused on providing places for people to live and stay within the V&A Waterfront precinct, supporting

its role as a key tourism and urban destination. Parcels a1 and a2 are intended for cultural and public-focused uses. These may include facilities that support education, culture, or visitor experiences, with the possibility of limited supporting uses such as retail where appropriate.

In addition, the development includes a new public open space (Atlantic Park) and an upgrade of the existing promenade. These areas will provide space for public use, recreation, and enjoyment of the waterfront environment. The proposal also includes associated infrastructure required to support the development, where and if applicable. The development will have a total development footprint of approximately 12 700 m^2 and a maximum building height of 32 m above EGL for Parcel O.

Key development parameters, including building dimensions and footprints, are summarised in Table 1 and Table 2.

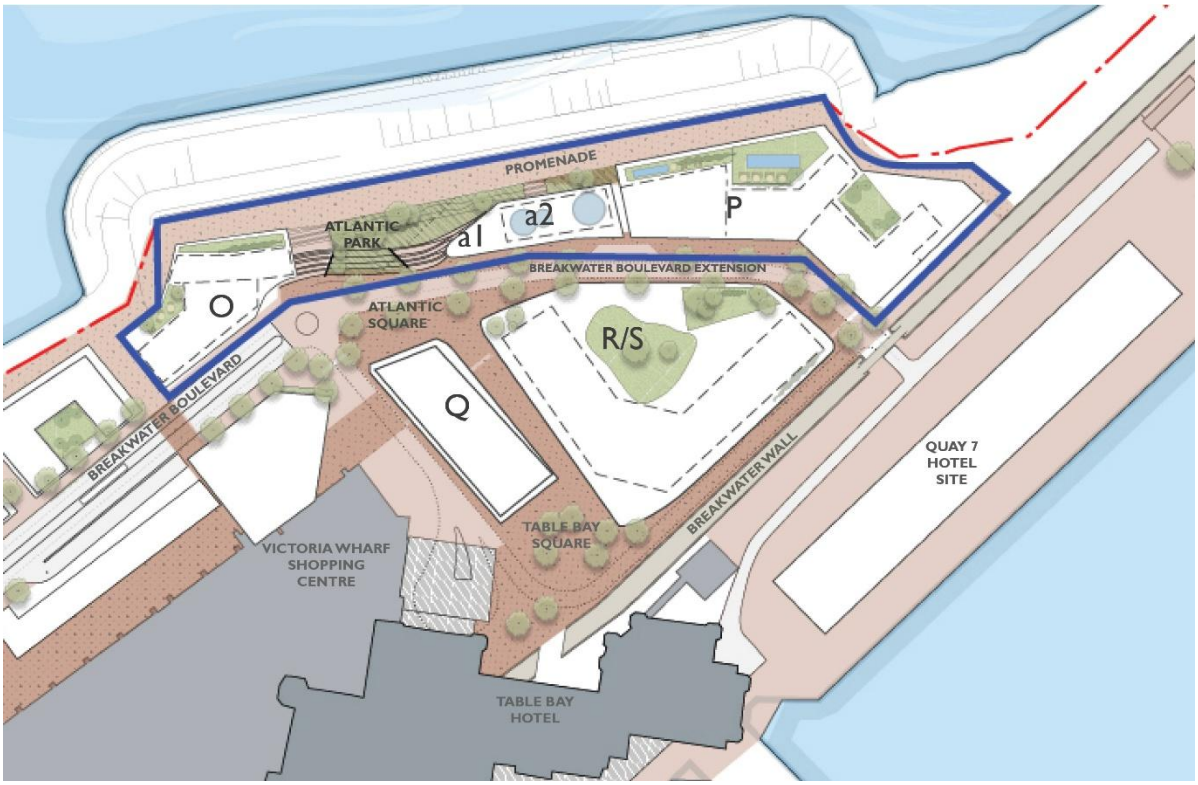

Figure 36. Proposed development layout and design for this project. This phase includes Block P, O and a1 & a2, Atlantic Park and the Promenade.

Table 6. Building dimensions and proposed land-use for Blocks P, O, a1 and a2.

Building Block	Max Height from Existing Ground Level	Building Footprint (m^2)	Gross Building Area (Gba) /Block (m^2)	GLA (m^2)	Proposed Land Use
Block P	±21m	4200	14 300	11 600	Mixed Use: Primarily Hotel/ Residential
a1 &a2	a1—±10m a2 —±17 m	1200	4 200	3 400	Mixed Use: Primarily Cultural
Block O	±32m	1750	10 000	8 600	Mixed Use: Primarily Residential /Hotel

Table 7. Erf number, cadastral size and anticipated development footprint.

Property	Cadastral size	Approximate extent to be utilised
158570 RE	29 338 m^2	900 m^2
149294 RE	854 442 m^2	10 000 m^2
177854	1 095 m^2	420 m^2
179076	4125 m^2	90 m^2

Provide a description of any other design or layout alternatives investigated.

Different building arrangements, heights, scale, architectural design and materials, the extent and location of buildings, public open space and pedestrian routes, and the proportion of residential, hotel, cultural and mixed-use components across the site were considered during the design phase.

However, the current proposal was identified as the most appropriate option for the site.

As a result, no other fundamentally different design or layout alternatives are considered feasible for the development.

Provide a motivation for the preferred design or layout alternative.

The design and layout of the proposed development were developed through an iterative process during the conceptualisation phase. This included investigating different building arrangements, heights, scale, architectural design and materials to ensure the development fits appropriately within the surrounding urban, coastal, and heritage context.

The preferred design makes the best use of the site while fitting in visually and physically with the surrounding V&A Waterfront area. The layout is guided by key site features such as the promenade and adjacent buildings, with proposed buildings positioned and scaled to fit within the wider urban environment. The design has also been refined to improve how people experience the development at ground level, including how easily they can move through the area and use the public spaces, while still maintaining the existing character of the precinct.

The current proposal also optimises socio-economic and visual benefits associated with the development.

Overall, the preferred design and layout provides an appropriate and practical solution for the site, ensuring efficient use of space and integration with the surrounding urban environment.

Provide a detailed motivation if no design or layout alternatives exist.

Variations in building arrangement, the extent and location of public open space, pedestrian routes, and the proportion of mixed-use components across the site were considered during the conceptualisation phase. However, the current design and layout represents the preferred option as it makes the most efficient use of the site, integrates appropriately into the surrounding precinct, and optimises socio-economic and visual benefits associated with the development, while all identified environmental impacts can be satisfactorily mitigated to acceptable levels.

As a result, no additional environmental benefit or meaningful impact mitigation would be achieved through the consideration of alternative design or layout options, and no further alternatives were therefore taken forward for assessment in this Basic Assessment process.

List the positive and negative impacts that the design alternatives will have on the environment.
The activity, design, layout, and operational alternatives are interrelated and were therefore assessed in an integrated manner. As a result, the positive and negative impacts identified for the property and site alternatives are the same as those for the activity alternatives, as these were not assessed separately. For ease of reference, the impacts are therefore repeated below. **PREFERRED ALTERNATIVE** **<u>Construction Positive:</u>** • Positive impact on gross output and GDP • Positive impact on employment • Positive impact on household income • Positive impact on government revenues **<u>Operational Positive:</u>** • Positive impact on gross output and GDP • Positive impact on employment • Positive impact on household income • Positive impact on government revenues • Positive impact on skills development • Positive impact on public open space and amenity value • Positive impact on the visitor economy • Positive impact on sense of place (visual), and townscape resources. **<u>Construction Negative:</u>** • Negative impact associated with noise and dust pollution • Negative impact associated with physical health and safety concerns • Negative impacts upon maritime archaeological and/or submerged pre-colonial archaeological heritage resources • Negative impact on sense of place (visual), and townscape resources. • Negative impact of pollution on the marine environment **<u>Operational Negative:</u>** No negative impacts have been identified for this phase. **Overall, the preferred design alternative is expected to result in strong net positive socio-economic outcomes and improvements to sense of place, visual character, and townscape quality, with multiple benefits during both the construction and operational phases. Negative impacts are limited to short-term, localised construction-related effects that can be effectively managed through mitigation, with no operational negative impacts identified.**

~~1.4.~~	~~**Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.**~~
~~Provide a description of the preferred technology alternative:~~	
N/A	
~~Provide a description of any other technology alternatives investigated.~~	
N/A	
~~Provide a motivation for the preferred technology alternative.~~	
N/A	
~~Provide a detailed motivation if no alternatives exist.~~	
N/A	
~~List the positive and negative impacts that the technology alternatives will have on the environment.~~	
N/A	
1.5.	**Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.**
~~Provide a description of the preferred operational alternative.~~	
Not Applicable (N/A) Operational alternatives are not considered applicable to the proposed development. Operational alternatives are generally more relevant to facilities or infrastructure projects where different operational processes, technologies, or management approaches may be considered. In this instance, the proposed development comprises a mixed-use urban development and no feasible or meaningful operational alternatives have been identified at this stage.	
~~Provide a description of any other operational alternatives investigated.~~	
N/A as per the motivation above	
~~Provide a motivation for the preferred operational alternative.~~	
N/A as per the motivation above	
~~Provide a detailed motivation if no alternatives exist.~~	
N/A as per the motivation above	
~~List the positive and negative impacts that the operational alternatives will have on the environment.~~	
N/A as per the motivation above	
1.6.	**The option of not implementing the activity (the 'No-Go' Option).**
Provide an explanation as to why the 'No-Go' Option is not preferred.	
If Authorised If authorised, the proposed mixed-use tourism and hotel development will have strong net positive socio-economic benefits, together with improvements to sense of place, visual character, and townscape quality. The site is currently underutilised and will be transformed from a parking area within the V&A Waterfront precinct into a more productive urban use. This will support the expansion of both the V&A Waterfront and the City of Cape Town's tourism and residential offering by providing additional, high-quality accommodation and associated facilities for local and international visitors. The development will further strengthen the economic performance of the precinct by increasing visitor activity and expenditure. It will provide ongoing employment in the hospitality and related sectors, increase household income, contribute to government revenues, support skills development	

and broader economic participation, strengthen public open space and amenity value, and reinforce the local economy. Construction activities will also generate employment opportunities across a range of skill levels.

No operational negative impacts are anticipated. Potential negative impacts are limited to minor, short-term, localised construction-related effects such as noise, dust, visual disturbance, and health and safety risks of construction workers, all of which can be effectively managed through standard mitigation measures.

If not Authorised (no-go option)

If the 'no-go' alternative is selected, the site will remain in its current state as a parking area, with limited social, economic, or spatial value relative to its strategic location within a high-profile urban and tourism node. While this alternative would avoid the minor short-term construction-related impacts associated with the proposed development, it would also result in the loss of substantial long-term benefits, which are considered to outweigh these short-term impacts.

These lost-opportunity costs include:

- No enhancement of the V&A Waterfront's economic value or revenue generation potential;
- No provision of additional tourist accommodation within a high-demand area;
- No creation of employment opportunities during construction or operation;
- No opportunities for skills development and local economic upliftment;
- No contribution to increased economic output or broader economic growth;
- No improvement in public realm, amenity value, or sense of place within the precinct.

In summary, the 'no-go' alternative therefore carries a significant lost-opportunity cost in terms of unrealised socio-economic and spatial benefits.

Conclusion

Based on a comparison of the anticipated impacts, the proposed development is expected to result in substantial positive socio-economic benefits that outweigh the minor, localised, and largely short-term negative impacts. The 'no-go' alternative, while avoiding these limited impacts, would prevent the realisation of these benefits and is therefore not preferred.

1.7.	Provide and explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.

As discussed above, no alternative site or property was assessed, as the proposed development is location-specific and designed to make use of existing infrastructure and available space within an already established urban node, thereby avoiding the need to develop undeveloped or environmentally sensitive areas

In addition, no fundamentally different activity alternatives are considered feasible at this stage of the development process, and the current proposal represents the most appropriate and optimised development option for the site.

1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.

The preferred alternative is the proposed mixed-use residential, commercial, and tourism development on the site within the V&A Waterfront, Cape Town. The site is located within a highly transformed and well-established urban environment characterised by a mix of commercial, residential, industrial, and tourism-related land uses. It is already serviced by existing infrastructure, including roads, stormwater systems, pedestrian walkways, and landscaping, and is well integrated into the surrounding area with direct access from Breakwater Boulevard.

The proposed development is considered appropriate for this location, as it aligns with the existing mixed-use character of the V&A Waterfront and introduces a compatible mix of residential, commercial, and public spaces. Its location within an established urban node limits pressure on sensitive or undeveloped areas, while any potential coastal, heritage, or visual impacts can be managed through mitigation.

The site is located on reclaimed land that was historically created for development purposes and has long been earmarked for such use. It is zoned Mixed Use 3 (MU3), and the proposed land uses are consistent with the City of Cape Town-approved Package of Plans for the V&A Waterfront. The site is currently used for overflow parking, container storage, and construction-related activities, and its redevelopment will optimise the use of available space and existing infrastructure. It is also well positioned to support economic activity, tourism, and public benefit, given its proximity to the coastline, established tourism areas, the city centre, and major transport routes.

During the conceptualisation phase, different development scenarios and design alternatives were considered. The proposed development represents the preferred option, selected based on its ability to optimise land use, economic viability, and integration with the existing urban area. The design has been iteratively refined to ensure efficient use of space and resources, while remaining responsive to the surrounding urban, heritage, and coastal environment.

Based on a comparison of the anticipated impacts, the proposed development is expected to result in substantial positive socio-economic benefits that outweigh the minor, localised, and largely short-term negative impacts. The 'no-go' alternative, while avoiding these limited impacts, would prevent the realisation of these benefits and is therefore not preferred.

2 "NO-GO" AREAS

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).
No "no-go" areas have been identified as the proposed site is located within the existing urban fabric of the V&A Waterfront, Cape Town. The area is highly transformed, currently functioning as a parking area and storage container site, and does not contain sensitive natural environmental features or resources that would warrant exclusion from development.

3 METHODOLOGY TO DETERMINE THE SIGNIFICANCE RATINGS OF THE POTENTIAL ENVIRONMENTAL IMPACTS AND RISKS ASSOCIATED WITH THE ALTERNATIVES.

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.

3.1 IMPACT ASSESSMENT METHODOLOGY

A summary of the assessment methodology is provided below, with the detailed methodology included in Appendix N2.

Potential impacts (both positive and negative) associated with the proposed development were identified, described, and assessed in terms of their significance.

The significance of impacts was determined using the following criteria:

- The extent and location of the potential impact (i.e. local, regional, national);
- The duration of the potential impact (i.e. short term, medium term, long term);
- The intensity (or magnitude) of the potential impact (i.e. low, medium, high); and
- The likelihood or probability of the impact occurring (improbable, possible, probable, definite).

Impacts were first assessed without mitigation and then re-assessed assuming that effective mitigation and/or optimisation measures are implemented. Impacts that remain after mitigation measures have been implemented are referred to residual impacts.

For negative impacts, mitigation measures were identified where applicable, with the aim of reducing the overall impact significance to an acceptable level

Mitigation / impact management measures were classified as either:

- **Essential:** Mandatory measures that must be implemented and are non-negotiable. These measures are assumed to be implemented in the "with mitigation" impact scenario and are therefore incorporated into the post mitigation impact assessment significance rating; or

- **Best Practice / Recommended:** Non-mandatory measures that should be implemented where feasible and appropriate. Alternative measures or approaches may be adopted, provided that the required environmental outcome is still achieved and a clear and defensible motivation is provided for not implementing the recommended measure. These do not affect the overall impact rating if not implemented.

Optimisation measures aimed at enhancing potential benefits are generally considered Best Practice / Recommended and are non-mandatory.

Overall, mitigation and optimisation measures aim to:

- Promote more environmentally sound design, layout, or technology where feasible;
- Avoid, minimise, or remedy negative impacts;
- Enhance environmental and socio-economic benefits of the proposed development; and
- Ensure residual impacts remain within acceptable levels.

Impacts were assessed for both the construction phase (including construction of the mixed-use development and associated infrastructure) and the operational phase (post-construction operation of the facility). As no decommissioning phase is planned for this development in the foreseeable future, impacts associated with decommissioning on the various receptors have not been assessed. Cumulative impacts and the No-Go / Do-Nothing alternative were also assessed. Where relevant, these were assessed using the impact assessment methodology.

The table below presents the colour scheme used to visually convey the significance of positive and negative impacts identified for this development:

Colour scheme used to indicated impact significance, including negative impacts, neutral (insignificant) impacts, and positive impacts.

Positive Impacts	**Very High**
	High
	Medium
	Low
	Very Low
Neutral Impacts	**Insignificant**
Negative Impacts	**Very Low**
	Low
	Medium
	High
	Very High

4 ASSESSMENT OF EACH IMPACT AND RISK IDENTIFIED FOR EACH ALTERNATIVE

Note: The following table serves as a guide for summarising each alternative. The table should be repeated for each alternative to ensure a comparative assessment. The EAP may decide to include this section as Appendix J to this BAR.

4.1 INTRODUCTION

This section presents the assessment of potential impacts associated with the proposed development on various receptors. Impacts are considered for both the construction and operational phases and were assessed in accordance with the methodology outlined in Section 3.1 above (within Section H). As no decommissioning phase is proposed in the foreseeable future, decommissioning-related impacts have not been assessed.

Cumulative impacts and the No-Go (do-nothing) alternative were also considered. Where relevant, these were assessed using the impact assessment methodology outlined in Section 3.1 above. While cumulative impacts are briefly referred to in the impact tables below, a more detailed cumulative impact assessment is provided in a dedicated section below (Section 4.5 within Section H). The assessment of the No-Go alternative is provided in Section 4.6.

4.2 NOTE ON THE HERITAGE IMPACT ASSESSMENT

As detailed in Subsection 6 of Section G above ("*Heritage Resources*"), an integrated HIA was undertaken to satisfy the requirements of both the NEMA EIA Regulations and the NHRA.

The integrated HIA report was supported, and informed, by a further three supporting specialist studies, each assessing specific heritage-related aspects. These included an Archaeological Impact Assessment (AIA), a Visual and Townscape Impact Assessment (VIA), and a Socio-Economic Impact Assessment (SEIA).

While these supporting studies contain discrete impact assessments and can be considered independently where relevant, they are intrinsically linked from a heritage perspective and were therefore considered collectively in determining the overall "integrated" heritage impacts of the proposed development, as heritage perception/ value is influenced by archaeological, socio-economic, and visual resources.

As such, impacts on individual heritage receptors during the construction or operational phases were not separately assessed as part of the integrated HIA, but instead, were informed by the impact assessments contained within the individual specialist studies (AIA, VIA and SEIA). Consequently, overall heritage impacts were considered and discussed qualitatively within the HIA, which informed the final heritage recommendations. Similarly, no separate mitigation or optimisation measures were developed specifically for the HIA, and all measures included in the HIA were drawn from the AIA, VIA and SEIA.

As such, there are no dedicated impact tables specifically derived from the HIA, other than those from the respective specialist studies (AIA, VIA, SEIA). These are listed in Sections 4.3, 4.4, 4.5 and 4.6, below. However, cumulative heritage impacts were assessed separately within the HIA, drawing on information from these studies to consider the broader context in which the development will take place. This assessment included consideration of existing (completed) developments, developments currently underway, and approved future developments. Cumulative impacts were quantified and assigned an impact significance rating. The No-Go alternative was also assessed separately within the HIA and assigned an impact significance rating.

4.3 CONSTRUCTION PHASE IMPACTS

4.3.1 MARINE ENVIRONMENT

4.3.1.1 IMPACT OF POLLUTION ON THE MARINE ENVIRONMENT

Both the marine and terrestrial environments within and around the Port of Cape Town and surrounds have been subjected to high levels of development in the past and are heavily impacted by urbanisation. Within the marine and coastal realms, the major human influences on Table Bay are currently land-based sources of pollution, coastal engineering structures, shipping activities and ship derived pollution.

The proposed development footprint lies entirely on reclaimed land within a highly transformed terrestrial environment that already contains existing structures and infrastructure. The site is physically separated from the marine environment by a concrete retaining wall, and shoreline protection (dolosse) that extends some 30 m out to sea from the retaining wall. There is no functional connectivity between the site and the marine system. There are no marine associated species noted within or immediately adjacent to the site, and the site therefore has very low marine sensitivity. All potential impacts to the marine system resulting from the proposed expansion are likely to be assessed "Insignificant" because there is no anticipated direct disturbance, no removal of any natural vegetation or marine habitat, and no changes to hydrodynamic function or water quality. Activities across all project phases within the proposed site will likely have little to no direct impacts on fish or bird communities that utilise the adjacent area. There are no irreversible changes to marine form or function likely to be caused by the proposed expansion, and the land can be returned to the current state within two years of completion of the construction phase.

Mitigation measures have nevertheless been proposed for inclusion in the EMPr to avoid or minimise any potential impacts.

Essential Mitigation measures are as follows:

- Intentional disposal of any substance into the environment is strictly prohibited, while accidental spillage must be prevented, contained and reported immediately.
- All hazardous substances must be accompanied by a permit, a hazard report sheet, and a first aid treatment protocol and may only be handled by suitably trained operators.
- Spill kits must be available on site at all times, and staff must be trained in their proposed use.

4.3.2 SOCIO-ECONOMIC CONSIDERATIONS

4.3.2.1 IMPACT ON GROSS OUTPUT AND GDP

The proposed development is anticipated to generate direct, indirect, and induced effects on overall production and business turnover within the economy. This will be a temporary stimulation during the construction phase. The economic analysis considered the following: Direct, indirect, and Induced Impacts. Direct impacts measure the immediate economic activity associated with the development; Indirect impacts reflect changes in economic activity among suppliers and service providers that support these primary businesses; and induced impacts result from the re-spending of labour income earned through both direct and indirect employment.

The construction phase is estimated to support total economic output of approximately R4.3 billion, including indirect and induced effects, of which around R2.6 billion arises from secondary supply-chain and household-spending impacts. In terms of value added, the development is expected to contribute approximately R651 million directly to GDP, with total GDP contribution increasing to about R1.7 billion once indirect and induced effects are included. The table below presents the impact significance rating of the proposed development on gross output and GDP for the construction phase only. See the table, below:

IMPACT ON GROSS OUTPUT AND GDP	
Alternative:	**Preferred**
1. Potential impact and risk:	
Nature of impact:	**Positive; Temporary**
Extent and duration of impact:	Regional; Short-term
Consequence of impact or risk:	Medium
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain** (**Intensity)**	Medium
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**Moderately effective**
Proposed best practice/recommended **Optimisation Measures**	**Recommended/Best Practice Optimisation Measures** • Promote local procurement and prioritise the employment of local labour, where feasible. • Source construction materials, goods and services from local suppliers wherever practical.
Residual impacts:	**Positive; Temporary**
Cumulative impact post **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**

4.3.2.2 IMPACT ON EMPLOYMENT

The proposed development is expected to generate temporary employment during the construction phase. According to the economic analysis, approximately 5136 jobs will be supported through direct, indirect, and induced effects. These opportunities will extend across multiple sectors, including construction, and business and retail services.

Employment opportunities typically span a range of skill levels, reflecting the diverse technical, supervisory, and labour requirements of the project. Skilled jobs generally include technical, supervisory, and specialist roles that require formal qualifications, apprenticeships, or significant industry experience; Semi-skilled jobs generally require workers to have some level of training or practical experience, but without advanced professional qualifications; and Low-skilled or unskilled jobs include entry-level positions that require minimal formal training, and are often task-based.

The specialist analysis indicated that around 20% of jobs will be allocated to skilled workers, 45% to semi-skilled workers, and 35% to low-skill/unskilled workers. Together, these employment categories enable broad labour absorption during the construction phase, providing opportunities across different qualification and experience levels within the local workforce:

In addition to direct on-site employment, the project will indirectly support jobs across a range of linked sectors through supply chain and expenditure effects. These include manufacturing of construction materials (e.g. cement, steel, bricks, glass, and fittings), transport and logistics services, plant and equipment hire, wholesale and retail trade, fuel supply, and professional services such as engineering, environmental consulting, legal, and financial services. The table below highlights the temporary impact on employment during the construction phase.

IMPACT ON EMPLOYMENT	
Alternative:	**Preferred**
2. Potential impact and risk:	
Nature of impact:	**Positive; Temporary**
Extent and duration of impact:	Regional; Short-term
Consequence of impact or risk:	Medium
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain** (**Intensity)**	Medium
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**Effective**
Proposed best practice/recommended **Optimisation Measures**	**Recommended/Best Practice Optimisation Measures** • Promote local procurement and prioritise the employment of local labour, where feasible. • Where practical, support subcontracting opportunities for local SMMEs. • Where possible, promote inclusive hiring practices.
Residual impacts:	**Positive; temporary**
Cumulative impact post **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH POSITIVE**

4.3.2.3 IMPACT ON HOUSEHOLD INCOME

The construction phase of the proposed mixed-use development is expected to generate positive impacts on household income through the creation of direct, indirect, and induced employment opportunities. As individuals secure work on-site and within associated supply chains, wages earned will increase disposable income within local communities. This additional income can improve households' ability to meet basic needs, access services, and invest in education, health care, and small-scale enterprises. The circulation of earnings within the local economy further stimulates secondary economic activity, supporting broader income generation. Collectively, these effects contribute to enhanced livelihoods, improved living standards, and overall socio-economic wellbeing during the construction period.

The outcomes from economic analysis estimate the increase in total income to be approximately R856 million because of the capital expenditure of the construction phase. The table below highlights the temporary impact on household income during the construction phase.

IMPACT ON HOUSEHOLD INCOME	
Alternative:	**Preferred**
3. Potential impact and risk:	
Nature of impact:	**Positive; Temporary**
Extent and duration of impact:	Regional; Short-term
Consequence of impact or risk:	Medium
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain** (**Intensity)**	Medium
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**Moderately effective**
Proposed best practice/recommended **Optimisation Measures**	**Recommended/Best Practice Optimisation Measures** • Where feasible, maximise local employment opportunities. • Where practical, support opportunities for local SMMEs. • Where possible, promote the participation of women, youth, and historically disadvantaged groups.
Residual impacts:	**Positive; Temporary**
Cumulative impact post **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**

4.3.2.4 IMPACT ON GOVERNMENT REVENUES

Government revenue impacts arise through a combination of taxes, levies, and service charges generated during both the construction (CAPEX) and operational (OPEX) phases. These impacts occur at national, provincial, and local government levels.

During the construction phase, government revenue is primarily once-off in nature and linked directly to capital expenditure and the associated economic activity generated by the project. At the national level, revenue is derived from VAT on construction materials and professional services, corporate income tax on profits earned by construction firms and their suppliers, and PAYE deducted from construction workers' wages. Additional fiscal inflows may arise from fuel levies associated with transport and logistics, as well as customs duties where imported materials or equipment are utilised. Given the scale of a R1.7 billion development, VAT and PAYE alone are likely to represent an important fiscal contribution during the construction period.

At the provincial and local levels, revenue is generated through building plan approval fees, development and bulk infrastructure contributions, and increased municipal service charges during construction. Following completion, property rates may also increase if the land and improvements are reassessed at a higher value. Overall, while construction-phase fiscal impacts can be moderate to substantial, they are temporary in nature and largely aligned with the duration of the construction programme.

The table below highlights the temporary impact on increased government revenue during the construction phase.

IMPACT ON GOVERNMENT REVENUES	
Alternative:	**Preferred**
4. Potential impact and risk:	
Nature of impact:	**Positive; Temporary**
Extent and duration of impact:	National; Short-term
Consequence of impact or risk:	Medium
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain** (**Intensity)**	Medium
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**N/A**
Proposed best practice/recommended **Optimisation Measures**	**N/A**
Residual impacts:	**Positive; Temporary**
Cumulative impact post **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM POSITIVE**

4.3.2.5 IMPACT ASSOCIATED WITH NOISE AND DUST POLLUTION

The construction phase will result in temporary increases in noise and dust levels associated with site clearance, excavation, material transport, and general building activities. These impacts are typical of construction projects of this nature and are expected to be localised and short term. With the implementation of standard mitigation measures, such as dust suppression, appropriate storage of materials, vehicle speed controls, and adherence to regulated working hours, noise and dust effects are anticipated to remain within acceptable limits. Overall, the impacts are expected to be relatively minor and confined to the construction period, with no significant long-term consequences once activities are completed.

Although construction activities will generate noise and dust that may be noticeable to residents and visitors nearby, the overall impact is expected to be low, largely confined to the construction site and its immediate vicinity. The closest building is approximately 60 metres south of the development, while surrounding structures are predominantly parking facilities, further limiting potential disturbance. By implementing the proposed mitigation measures, these impacts can be reduced to a "Very Low" negative significance. Refer to the table below.

IMPACT ASSOCIATED WITH NOISE AND DUST POLLUTION	
Alternative:	**Preferred**
5. Potential impact and risk:	
Nature of impact:	**Negative; Temporary**
Extent and duration of impact:	Local; Short-term
Consequence of impact or risk:	Low
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources: **(Intensity)**	Low
Degree to which the impact can be reversed:	Not Reversable
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to mitigation:	**Cumulative socio-economic impact (including all individual impacts), assessed to be Positive. Pre/post mitigation not assessed individually.**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be avoided:	Cannot be fully avoided
Degree to which the impact can be managed:	Manageable
Degree to which the impact can be mitigated:	**Effective**
Proposed mitigation:	**Essential Mitigation Measures** • Ensure full compliance with all relevant national and municipal policies, regulations, and guidelines regarding noise and dust management, particularly when working near roads, sensitive receptors, and existing infrastructure. • Implement regular cleaning and maintenance of the construction site to prevent dust accumulation on surfaces, access roads, and surrounding areas. • Cover or securely store loose construction materials, soil, and debris to prevent windblown dust.
Residual impacts:	**Negative; temporary**
Cumulative impact post mitigation:	**Cumulative socio-economic impact (including all individual impacts), assessed to be Positive. Pre/post mitigation not assessed individually.**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW NEGATIVE**

4.3.2.6 IMPACT ASSOCIATED WITH PHYSICAL HEALTH AND SAFETY CONCERNS

Construction of the proposed mixed-use development presents potential physical health and safety risks for workers, site visitors, and the surrounding community. These include occupational hazards such as falls, machinery accidents, and exposure to dust, noise, and construction-related materials, as well as public safety risks from falling debris, site traffic, and uncontrolled access. These impacts are typically short-term and confined to the construction phase and require management through standard adherence to occupational health and safety regulations, use of personal protective equipment, implementation of site access controls, dust and noise mitigation measures, and regular safety training for all personnel as per the health and safety plan. With these precautions in place, the risks can be effectively minimised, ensuring a safe environment for workers and the public. The table below highlights the temporary impacts associated with physical health and safety during the construction phase.

IMPACT ASSOCIATED WITH PHYSICAL HEALTH AND SAFETY CONCERNS	
Alternative:	**Preferred**
7. Potential impact and risk:	
Nature of impact:	**Negative; Temporary**
Extent and duration of impact:	Local; Short-term
Consequence of impact or risk:	Low
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources: **(Intensity)**	Medium
Degree to which the impact can be reversed:	Not Reversable
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to mitigation:	**Cumulative socio-economic impact (including all individual impacts), assessed to be Positive. Pre/post mitigation not assessed individually.**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be avoided:	**Avoidance Effective**
Degree to which the impact can be managed:	**Management Effective**
Degree to which the impact can be mitigated:	**Mitigation Effective**
Proposed mitigation:	**Essential Mitigation Measures** • Adhere to occupational health and safety regulations as per the Health and Safety Plan for the project. • Use personal protective equipment, implement site access controls, and dust and noise mitigation measures. • Ensure regular safety training for personnel on site as per the health and safety plan.
Residual impacts:	**Negative; temporary**
Cumulative impact post mitigation:	**Cumulative socio-economic impact (including all individual impacts), assessed to be Positive. Pre/post mitigation not assessed individually.**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW NEGATIVE**

4.3.3 ARCHAEOLOGICAL RESOURCES

Heritage resources that were identified to be relevant to the AIA, in terms of Section 2 of the NHRA, included: Material remains of human activity older than 100 years (including artefacts and human remains), rock art older than 100 years, and any archaeological artefacts of cultural significance. These resources are legally protected, and any disturbance requires a permit from SAHRA or HWC.

4.3.3.1 IMPACT ON MARITIME ARCHAEOLOGICAL RESOURCES

The proposed development of Phase 1B project is likely to include substantial earthworks in the underlying fill for the hotel and residential elements of the project. Impacts to maritime archaeological sites and material may occur where such earthworks intersect with the former seabed. Should they occur, these impacts will be direct and may result in the damage to, or destruction of archaeological sites and/or artefacts. Impacts will be local in extent and will occur only within the footprint of development-related activities. However, these impacts will be permanent, since archaeological sites and materials are a non-renewable resource, and cannot be recovered if damaged. Since it is unknown whether there are any wrecks in the Granger Bay Phase 1B project area, it is difficult to assess impact significance—which depends to a large degree on the archaeological value of the affected site/material. It is, however, likely that impacts associated with damage/destruction of a previously undiscovered wreck will be of "Medium-High", which can be reduced to a significance of "Low" with the implementation of suitable mitigation measures. See the following table:

IMPACT ON MARITIME ARCHAEOLOGICAL RESOURCES	
Alternative:	**Preferred**
8. Potential impact and risk:	
Nature of impact:	**Negative; Permanent**
Extent and duration of impact:	Local; Long-Term (Irreversible)
Consequence of impact or risk:	High
Probability of occurrence:	Possible
Degree to which the impact may cause irreplaceable loss of resources: **(Intensity)**	High
Degree to which the impact can be reversed:	Non-Reversable
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to mitigation:	**AIA considered within cumulative heritage assessment (including all other individual heritage impacts), and assessed to be Positive. Pre/post mitigation not assessed individually.**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH**
Degree to which the impact can be avoided:	**Avoidance Highly Effective**
Degree to which the impact can be managed:	**Management Highly Effective**
Degree to which the impact can be mitigated:	**Mitigation Highly Effective**
Proposed mitigation:	**Essential Mitigation Measures** • Any groundworks on the Granger Bay Precinct Phase 1B site, to levels that may intersect with the former seabed must be subject to archaeological monitoring, with the necessary contingencies in place to allow the mitigation of shipwreck remains or pre-colonial archaeological material, should they be encountered. These contingencies may include the stoppage of work in the affected area until the necessary mitigation work has been concluded. Any such mitigation will be to the account of the developer. • Monitoring visits should be conducted by a suitably experienced archaeologist at least once per week, but more regular visits may be required as excavations deepen, and the potential grows for encountering the interface with the

	former seabed. • Archaeological information should be presented as part of the environmental training programme for all site staff and machine operators which will describe what sort of 30 archaeological items could be found on site, how to identify them, and the reporting procedure to follow should material be found when the archaeologist is not on site. • Should anything of interest be found by construction staff, this must immediately be reported to the project ECO and site manager, and the monitoring archaeologist called to site to assess the find and establish whether any form of mitigation is required. The sorts of material that would trigger such a call is large structural wooded or iron remains, layers of historical refuse containing particularly glass and ceramics, the remains of any built structures (although these are not expected in this area) and rocky, sandy or cobbly strata that may represent the former seabed.
Residual impacts:	**Negative; Temporary**
Cumulative impact post mitigation:	**AIA considered within cumulative heritage assessment (including all other individual heritage impacts), and assessed to be Positive. Pre/post mitigation not assessed individually.**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**

4.3.3.2 IMPACT ON SUBMERGED PRE-COLONIAL ARCHAEOLOGY

As with maritime archaeological sites and material, impacts to submerged pre-colonial archaeological resources may occur where earthworks intersect with the former seabed. Should they occur, impacts will be direct and may result in the damage to, or destruction of archaeological sites and/or artefacts. Impacts will be local in extent, occurring only within the footprint of development-related activities, but they will be permanent, because archaeological sites and materials are a non renewable resource and cannot recover if damaged. It is almost certain, that at times of lower sea levels, our ancestors utilised and occupied the present floor of Table Bay and left traces of their presence in and on the land. If such archaeological material has survived the subsequent marine transgressions and is sequestered in the seabed underlying the Phase 1B project area, the project-related impacts on such resources is likely to be of "High" negative significance. However, this can be reduced to a negative significance of "Medium" with the implementation of appropriate mitigation measures.

IMPACT ON SUBMERGED PRE-COLONIAL ARCHAEOLOGICAL RESOURCES	
Alternative:	**Preferred**
8. Potential impact and risk:	
Nature of impact:	**Negative; Permanent**
Extent and duration of impact:	Local; Long-Term (Irreversible)
Consequence of impact or risk:	High
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources: **(Intensity)**	High
Degree to which the impact can be reversed:	Non-Reversable
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to mitigation:	**AIA considered within cumulative heritage assessment (including all other individual heritage impacts), and assessed to be Positive. Pre/post mitigation not assessed individually.**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH NEGATIVE**

Degree to which the impact can be avoided:	**Avoidance Effective**
Degree to which the impact can be managed:	**Management Effective**
Degree to which the impact can be mitigated:	**Mitigation Effective**
Proposed mitigation:	**Essential Mitigation Measures** • Any groundworks on the Granger Bay Precinct Phase 1B site, to levels that may intersect with the former seabed must be subject to archaeological monitoring, with the necessary contingencies in place to allow the mitigation of shipwreck remains or pre-colonial archaeological material, should they be encountered. These contingencies may include the stoppage of work in the affected area until the necessary mitigation work has been concluded. Any such mitigation will be to the account of the developer. • Monitoring visits should be conducted by a suitably experienced archaeologist at least once per week, but more regular visits may be required as excavations deepen, and the potential grows for encountering the interface with the former seabed. • Archaeological information should be presented as part of the environmental training programme for all site staff and machine operators which will describe what sort of 30 archaeological items could be found on site, how to identify them, and the reporting procedure to follow should material be found when the archaeologist is not on site. • Should anything of interest be found by construction staff, this must immediately be reported to the project ECO and site manager, and the monitoring archaeologist called to site to assess the find and establish whether any form of mitigation is required. The sorts of material that would trigger such a call is large structural wooded or iron remains, layers of historical refuse containing particularly glass and ceramics, the remains of any built structures (although these are not expected in this area) and rocky, sandy or cobbly strata that may represent the former seabed.
Residual impacts:	**Negative; Temporary**
Cumulative impact post mitigation:	**AIA considered within cumulative heritage assessment (including all other individual heritage impacts), and assessed to be Positive. Pre/post mitigation not assessed individually.**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**

4.3.4 Visual and Townscape Considerations

4.3.4.1 Impact on sense of place (visual), and townscape resources.

During the construction phase, the visual character of the site and its surroundings will be temporarily altered, which may negatively affect the sense of place for nearby residents, visitors, and users of the V&A Waterfront precinct.

Construction activities, including the presence of scaffolding, cranes, machinery, stockpiles of building materials, and temporary fencing, can create visual clutter and reduce the aesthetic quality of the area. Views to and from the waterfront, as well as sightlines of adjacent public spaces and heritage features, may be partially obscured, diminishing the overall visual experience.

Although these impacts are temporary and confined to the construction period, they may affect the enjoyment of the public realm, the perceived attractiveness of the precinct, and the local identity during this time. However, it is important to acknowledge that the current character of the site is already impacted by construction works on the immediately adjacent land parcels.

Effective on-site construction management should mitigate other anticipated impacts during the construction phase by ensuring that all activities are confined to demarcated and boarded areas, implementing appropriate site rehabilitation and management measures upon completion of the works, and safeguarding elements identified for retention, including existing palm trees within the central street island. The table below outlines the temporary impact on visual, sense of place, and on townscape resources during the construction phase.

IMPACT ON SENSE OF PLACE (VISUAL) AND TOWNSCAPE RESOURCES	
Alternative:	**Preferred**
1. Potential impact and risk:	
Nature of impact:	**Negative; Temporary**
Extent and duration of impact:	Local; Short-Term
Consequence of impact or risk:	Low
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources: **(Intensity)**	High
Degree to which the impact can be reversed:	High
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to mitigation:	**Cumulative visual impact assessed to be Positive. Pre/post mitigation not assessed individually.**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW NEGATIVE**
Degree to which the impact can be avoided:	**Non-Avoidable**
Degree to which the impact can be managed:	**Management Effective**
Degree to which the impact can be mitigated:	**Mitigation Effective**
Proposed mitigation:	**Essential Mitigation Measures** • Limiting construction to within hoarded areas; • Site rehabilitation and management following completion of the works; and • Preservation of elements to be retained, such as existing palm trees in the central street island.
Residual impacts:	**Negative; Temporary**
Cumulative impact post mitigation:	**Cumulative visual impact assessed to be Positive. Pre/post mitigation not assessed individually.**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**VERY LOW NEGATIVE**

4.3.5 TRAFFIC

Construction phase traffic impacts are likely to be insignificant and have therefore been screened out of the assessment.

4.4 OPERATIONAL PHASE

4.4.1 SOCIO-ECONOMIC

4.4.1.1 IMPACT ON GROSS OUTPUT AND GDP

Once operational, the proposed development is expected to generate sustained positive economic impacts through increased gross output and contribution to GDP. The provision of hotel accommodation, luxury residential units, and associated commercial and leisure facilities will stimulate ongoing demand for goods and services, supporting both direct business revenues and the broader supply chain. This activity contributes net economic value by creating jobs, generating

household income, and circulating money through the local and regional economy. The resulting increase in production and service provision enhances overall GDP, reflecting the development's role in strengthening the economic base, promoting investment, and supporting long-term growth within the V&A Waterfront precinct and the wider metropolitan area.

Beyond direct output, the operation of the development will generate additional economic benefits through indirect and induced effects. Indirect effects arise from the increased activity of suppliers and service providers supporting the development, including food and beverage suppliers, maintenance and cleaning contractors, utilities, and professional services. Induced effects occur as employees and business owners spend their wages within the local economy on housing, retail, transport, and other services. Together, these multiplier effects amplify the development's contribution to gross output and GDP, creating a broader and more sustained uplift in economic activity, supporting employment, household income, and the prosperity of surrounding communities over the long term.

The economic analysis suggests that the operational phase of the proposed development will generate some R311 million in gross output and contribute around R159 million to GDP annually. The table below highlights the positive sustained impact on output and GDP during operation.

IMPACT ON GROSS OUTPUT AND GDP	
Alternative:	**Preferred**
1. Potential impact and risk:	
Nature of impact:	**Positive; Long-term**
Extent and duration of impact:	Regional; Long-term
Consequence of impact or risk:	High
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain** (**Intensity)**	Medium
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; <u>pre/post optimisation not assessed individually.</u>**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**Optimisation Moderately Effective**
Proposed best practice/recommended **Optimisation Measures**	**Recommended/Best Practice Optimisation Measures** • Promote local procurement and prioritise the employment of local labour, where feasible. • Where practical, encourage partnerships with local businesses, tourism operators and cultural or event initiatives. • Where feasible, promote workforce development programmes.
Residual impacts:	**Positive; Long-term**
Cumulative impact post **optimisation**:	**Overall positive impact; <u>pre/post optimisation not assessed individually.</u>**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH POSITIVE**

4.4.1.2 IMPACT ON EMPLOYMENT

The operational phase of the mixed-use development is expected to generate a sustained positive impact on employment by providing long-term job opportunities across a range of skill levels. Direct employment will include hotel staff, residential management personnel, security, cleaning, and administrative roles, while indirect employment will arise within the development's supply chain, including food and beverage suppliers, maintenance contractors, utilities, and professional services. Induced employment will result from household spending by employees and business owners throughout the local economy, supporting additional jobs in retail, transport, education, and community services. Employment opportunities will span skilled, semi-skilled, and low-skilled or unskilled categories, reflecting the diverse operational requirements of the development. This broad-based employment contribution not only enhances household income and economic resilience in the surrounding community but also strengthens the overall regional labour market by supporting a mix of professional, technical, and entry-level roles.

An estimated total of 369 permanent jobs will be created through direct, indirect, and induced mechanisms as a result of the proposed development. The optimisation measures aim to maximise the number, quality, and sustainability of jobs generated by the mixed-use development, support household incomes, strengthen local supply chains and enhance the long-term contribution of the project to the regional economy.

IMPACT ON EMPLOYMENT	
Alternative:	**Preferred**
2. Potential impact and risk:	
Nature of impact:	**Positive; Long-term**
Extent and duration of impact:	Regional; Long-term
Consequence of impact or risk:	High
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain** (**Intensity)**	Medium
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually.**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**Optimisation Moderately Effective**
Proposed best practice/recommended **Optimisation Measures**	**Recommended/Best Practice Optimisation Measures** • Promote local procurement and prioritise the employment of local labour, where feasible. • Where practical, support subcontracting opportunities for local SMMEs. • Where possible, promote inclusive hiring practices.
Residual impacts:	**Positive; Long-term**
Cumulative impact post **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually.**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH POSITIVE**

4.4.1.3 IMPACT ON HOUSEHOLD INCOME

The operational phase of the proposed mixed-use development is expected to generate sustained household income, albeit with a smaller overall employment impact compared to the construction phase. Based on estimates from the economic analysis, the development is projected to support approximately R74 million in household income. This income will be derived from a diverse range of employment opportunities created across the various components of the development.

Jobs will be generated in administration, professional services, and business support roles; in guest services, housekeeping, food and beverage, and hotel management, while the residential components will create positions in property management, security and caretaking, and cleaning services. Cultural and public facilities will generate employment in administration, event coordination, tourism, and facility operations, complemented by ongoing roles in maintenance, security, and groundskeeping across the development.

The mixed-use nature of the project ensures that employment opportunities span a wide range of skill levels, from entry-level service positions to specialised technical and managerial roles, contributing to a stable and sustained flow of household income within the local and regional economy. In addition to the direct earnings of employees, the operational phase will support indirect and induced income effects as wages are spent within local supply chains and households. This circulation of income amplifies the economic benefits, generating further employment, business activity, and household spending in the surrounding community. The table below highlights the potential sustained positive impact on household impact during operation.

IMPACT ON HOUSEHOLD INCOME	
Alternative:	**Preferred**
3. Potential impact and risk:	
Nature of impact:	**Positive; long-term**
Extent and duration of impact:	Regional; Long-term
Consequence of impact or risk:	High
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain** (**Intensity)**	Medium
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually.**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**Optimisation Somewhat Effective**
Proposed best practice/recommended **Optimisation Measures**	**Recommended/Best Practice Optimisation Measures** • Where feasible, maximise local employment opportunities s. • Where practical, support opportunities for local SMMEs. • Where possible, promote the participation of women, youth, and historically disadvantaged groups.
Residual impacts:	**Positive; Long-term**
Cumulative impact post **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually.**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH POSITIVE**

4.4.1.4 IMPACT ON GOVERNMENT REVENUES

During the operational phase, government revenues become recurring and longer-term, often providing a more stable and sustainable fiscal contribution than the one-off inflows associated with construction. At the national level, revenue is generated through corporate income tax from hotel operations and property management companies, as well as PAYE from permanent staff employed across the development. Value-added tax VAT collected on accommodation, food and beverage sales, retail, and service provision further contributes to national revenue. Dividends tax may also apply where profits are distributed to shareholders. With the development expected to generate annual turnover in the region of R148 million, VAT and PAYE are anticipated to provide consistent and predictable revenue streams each year.

At the local government level, operational revenue arises primarily through property rates, which can be substantial for high-value luxury apartments, as well as municipal service charges for water, electricity, refuse, and sewerage. Additional revenues may include tourism levies, where applicable, and business licensing fees. Collectively, these operational-phase fiscal contributions reflect the long-term benefits of the development to both national and local government budgets, supporting municipal services and regional economic stability. The table below highlights the potential sustained impact on government revenue during the operational phase.

IMPACT ON GOVERNMENT REVENUES	
Alternative:	**Preferred**
4. Potential impact and risk:	
Nature of impact:	**Positive; Long-Term**
Extent and duration of impact:	National; Long-term
Consequence of impact or risk:	High
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain** (**Intensity)**	Medium
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**N/A**
Proposed best practice/recommended **Optimisation Measures**	**N/A**
Residual impacts:	**Positive; Long-term**
Cumulative impact post **optimisation**:	**Overall positive impact**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH POSITIVE**

4.4.1.5 IMPACT ON SKILLS DEVELOPMENT

During the operational phase of the proposed development, ongoing employment opportunities will provide a platform for local skills development across multiple sectors. Positions in hospitality including front-of-house staff, cleaners, kitchen personnel, and guest services alongside roles in facilities and property management, such as building maintenance, security, and administration, offer entry points into the formal labour market and the chance to acquire practical, transferable skills.

Specific opportunities for skills development include on-the-job training in customer service, sales, stock control, and digital point-of-sale systems; front-desk and guest service competencies in hospitality and short-term accommodation; and basic facilities and property management skills for operational staff. The development may also provide workplace exposure for students, interns, or trainees. By facilitating these experiences, the project can strengthen local workforce readiness, enhance career progression, and contribute to the growth of Cape Town's urban services economy. These outcomes are particularly valuable for youth and first-time job seekers in surrounding communities, supporting broader regional goals of employability and skills development. The table below outlines the positive impact associated with skills development during the operational phase.

IMPACT ON SKILLS DEVELOPMENT	
Alternative:	**Preferred**
5. Potential impact and risk:	
Nature of impact:	**Positive; Long-term**
Extent and duration of impact:	Regional; Long-term
Consequence of impact or risk:	Medium
Probability of occurrence:	Possible
Degree to which the **impact may cause resource gain** (**Intensity)**	Low
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually.**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**Optimisation Effective**
Proposed best practice/recommended **Optimisation Measures**	**Recommended/Best Practice Optimisation Measures** • Where feasible, prioritise recruitment of residents from surrounding communities. • Where possible and feasible, implement formal training modules and offer ongoing professional development courses.
Residual impacts:	**Positive; Long-term**
Cumulative impact post **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually.**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM POSITIVE**

4.4.1.6 IMPACT ON PUBLIC OPEN SPACE AND AMENITY VALUE

The inclusion of Atlantic Park within the proposed mixed-use development is expected to generate a sustained positive impact by enhancing open space and amenity value for the precinct and the wider community. Strategically located at the junction of the Promenade, Breakwater Boulevard, Victoria Wharf Shopping Centre, and the pedestrian link connecting Table Bay Square to the proposed Atlantic Park, the park provides a highly accessible public space at promenade level. Visitors and residents will be able to enjoy expansive views of the ocean and the mountain to the south, as well as the broader Granger Bay area. By offering a landscaped, open environment for recreation, relaxation, and social interaction, Atlantic Park complements existing V&A Waterfront buildings and open spaces while strengthening the pedestrian experience. The park, together with a widened nine-metre Promenade, improves connectivity and visual access to the water, contributing to the aesthetic quality of the area and supporting the long-term cultural, recreational, and economic vitality of the precinct. These features are especially important in densely built urban areas where public open space is scarce.

Research suggests that public open spaces offer numerous benefits, and Atlantic Park is well-positioned to deliver these within the high-density V&A Waterfront precinct. By providing accessible green space with ocean and mountain views, the park will support physical and mental well-being, offer opportunities for recreation and leisure, and create a venue for social interaction and community events. Environmentally, the park contributes to urban cooling, enhances biodiversity, and improves the aesthetic quality of the area. Economically, attractive public spaces such as Atlantic Park can increase surrounding property values, stimulate visitor spending, and complement the commercial and cultural activities of the area. Ensuring that the Park is well-lit and designed with safety in mind is critical to creating an inclusive and safe environment. Adequate lighting improves visibility during evening hours, deters anti-social behaviour, and enhances the perception of safety for all users. Safety-focused design, including clear sightlines, accessible pathways, and secure seating areas, ensures that people of all ages and abilities can use the space comfortably. Inclusive measures such as ramps, tactile paving, seating for older adults, and shaded areas make the park accessible to those with mobility challenges, parents with strollers, and individuals with visual impairments. By prioritising lighting, safety, and inclusivity, the development not only promotes greater use of the park but also fosters a sense of community, wellbeing, and belonging for residents and visitors.

IMPACT ON PUBLIC OPEN SPACE AND AMENITY VALUE	
Alternative:	**Preferred**
6. Potential impact and risk:	
Nature of impact:	**Positive; Long-term**
Extent and duration of impact:	Regional; Long-term
Consequence of impact or risk:	High
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain (Intensity)**	Medium
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually.**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**Optimisation Moderately Effective**
Proposed best practice/recommended **Optimisation Measures**	**Recommended/Best Practice Optimisation Measures** • Where practical, prioritise lighting, safety, and inclusivity in the design of the park space.
Residual impacts:	**Positive; Long-term**
Cumulative impact post **optimisation**:	**Overall positive impact; pre/post optimisation not assessed individually.**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH POSITIVE**

4.4.1.7 IMPACT ON THE VISITOR ECONOMY

The operation of the proposed mixed-use development is expected to provide a sustained positive impact on the visitor economy by attracting additional domestic and international visitors to the area. The inclusion of a hotel, luxury apartments, retail spaces, dining outlets, and public amenities such as Atlantic Park will create a vibrant destination that encourages longer stays and increased visitor spending. Visitors will generate economic activity not only through accommodation and food services on-site but also through retail, entertainment, transport, and leisure activities in the surrounding precinct. By enhancing the attractiveness of the V&A Waterfront area as a high-quality, accessible urban destination, the development will support local businesses, strengthen tourism-related supply chains, and contribute to Cape Town's broader visitor economy over the long term. To optimise this impact, several enhancement measures can be implemented. The development could actively partner with local tourism operators, cultural institutions, and event organisers to create packages or experiences that encourage extended visits. Investment in high-quality wayfinding, signage, and digital engagement tools could improve visitor navigation and experience, increasing the likelihood of repeat visits. Hosting regular cultural, recreational, or food and beverage events within the development and public spaces can further drive footfall and local spending. Additionally, promoting sustainable and inclusive tourism practices will enhance the reputation of the precinct as a welcoming and responsible destination, ensuring long-term economic benefits.

IMPACT ON THE VISITOR ECONOMY	
Alternative:	**Preferred**
7. Potential impact and risk:	
Nature of impact:	**Positive; Long-term**
Extent and duration of impact:	Regional; Long-term
Consequence of impact or risk:	High
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain** (**Intensity)**	Medium
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; <u>pre/post optimisation not assessed individually.</u>**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM-HIGH POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**Optimisation Moderately Effective**
Proposed best practice/recommended **Optimisation Measures**	**Recommended/Best Practice Optimisation Measures** • Where practical, partner with local tourism operators, cultural institutions and event organisers, and align with V&A Waterfront tourism initiatives. • Investment in high-quality wayfinding, signage, and digital engagement tools.
Residual impacts:	**Positive; Long-term**
Cumulative impact post **optimisation**:	**Overall positive impact; <u>pre/post optimisation not assessed individually.</u>**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**HIGH POSITIVE**

4.4.2 VISUAL AND TOWNSCAPE CONSIDERATIONS

4.4.2.1 IMPACT ON SENSE OF PLACE (VISUAL), AND TOWNSCAPE RESOURCES.

The preferred development option is expected to result in a positive impact on sense of place by introducing a high-quality, publicly accessible waterfront environment that strengthens visual and physical connections to the sea. The development will enhance the character and identity of the area through the creation of an active promenade, improved public realm and sensitively designed urban form that responds to its coastal setting. While changes to the existing townscape will occur, these are considered low in intensity and largely confined to the immediate and local context, with benefits arising from increased accessibility, amenity and urban cohesion.

This positive impact can be further reinforced through adherence to established urban design indicators and architectural guidelines, alongside targeted investment in public realm upgrades. Refer to the table below.

IMPACT ON SENSE OF PLACE (VISUAL) AND TOWNSCAPE RESOURCES	
Alternative:	**Preferred**
1. Potential impact and risk:	
Nature of impact:	**Positive; Long-term**
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Low
Probability of occurrence:	Probable
Degree to which the **impact may cause resource gain** (**Intensity)**	Low
Degree to which the impact can be reversed:	Positive impact: reversing not appropriate/desirable.
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to **optimisation**:	**Overall positive impact; <u>pre/post optimisation not assessed individually.</u>**
Significance rating of impact prior to **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**LOW POSITIVE**
Degree to which the impact can be avoided:	Positive impact: avoidance not appropriate/desirable.
Degree to which the impact can be managed:	Positive impact: management not appropriate/desirable.
Degree to which the impact can be **(Optimised):**	**Mitigation and Optimisation Effective**
Proposed best practice/recommended **Optimisation Measures**	**Essential Mitigation Measures:** • Adherence to the Urban Design Indicators (see document entitled "Urban Design Informants: granger Bay Phase 1 Parcels O, P. a1 & a2", dated March 2026) • Adherence to the Recommendations/Commitments Relating to Townscape and Architecture, as follows: **Ground-Level Activation and Promenade Interface** • Activate ground floors of buildings along the sea facing promenade and limit the level change between the promenade and building terraces to a maximum of 2m, so as to facilitate surveillance onto the promenade while maintaining privacy of private terraces. • The promenade walkway must include seating and lighting to enhance public utilisation thereof. • Main pedestrian entrances of buildings directly off Breakwater Boulevard & Street to be as visible as possible from the sidewalk so as to animate the street space. • Limit vehicular and delivery access points off Breakwater Boulevard & Street as far as possible. • Screen unavoidable vehicular access or delivery entrances along Breakwater Boulevard & Street. **Heights and Massing: Buildings and Structures** • Within the Breakwater Boulevard view corridor structures

	and buildings are limited to a maximum of 12.5 MSL • Sea-facing facades to be set back a minimum of 2m from the edge of the promenade so that buildings do not encroach onto the shared space character of the promenade. • Buildings with facades longer than ±20m should be articulated with vertical recesses or protrusions to break down their scale. • The seafront façade of Parcel O should setback at least once to lessen building massing facing the promenade. • The massing of Parcel O should be articulated through horizontal and vertical setbacks. **Architectural Materiality and Coastal Context** • Facade textures of Parcels P and O should be articulated by means of balconies, pergolas and screens to break down the scale of the facades of these buildings. • Materials should be appropriate to a coastal promenade character while maintaining an overall coherence within the greater precinct. • Buildings should be differentiated from one another by a variety of textures, materials and detailing (avoid both a single typology and a broad mix of typologies) • Reduce fully glazed facades while utilising a pragmatic approach to maximizing ocean views. • The floorplate of the upper level of Parcel O should be inset and of a darker and / or different material to reduce perceived height from the public realm and in relation to the overall skyline. **Recommended/Best Practice Optimisation Measures** • The landscape treatment of Atlantic Park should be designed in a way that is conscious of, and reflects its unique sense of place, incorporating coastal vegetation and public amenity elements that reflect the positioning of this space at the waters' edge. • That a Landscape Plan and Elevations incorporating these aspects be produced for any future SDP applications (to be assessed by the local authority, the City of Cape Town Municipality).
Residual impacts:	**Positive; Long-term**
Cumulative impact post **optimisation**:	**Overall positive impact; <u>pre/post optimisation not assessed individually.</u>**
Significance rating of impact after **optimisation** (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM POSITIVE**

4.4.3 TRAFFIC

During operation, the subject site will be accessed directly from Breakwater Boulevard (Blvd), which is accessed via Granger Bay Boulevard (Blvd). Traffic modelling and analysis has shown that this route has excess capacity during peak periods.

Traffic on Granger Bay Blvd is generated by a mix of land uses including offices and a strong retail component. Peak traffic on Breakwater Blvd is dominated by retail activity (primarily Victoria Wharf shopping centre). The proposed developments (primarily hotel, residential and cultural) will generate traffic in the opposite direction to office traffic and will typically avoid retail peaks. The AM distribution is beneficial from a capacity perspective, as it utilises spare capacity in the non-peak direction Therefore, they will not contribute significantly to existing periods of peak demand.

The development of parcels O, P & a in Phase 1B will have a minor impact on roads inside and outside the V&A, requiring no change to the road network. This is due to a combination of the counter-peak

flow direction of traffic generated by residential development in general, and the relatively small scale of the development. Private vehicle trips have been calculated with no assumed shift to alternative modes, notwithstanding the intention of the V&AW to encourage a shift to public transport.

Parking will follow the V&A's standard approach of providing a portion on-site with spillover in nearby parking garages, taking advantage of the varying periods when different land uses exhibit peak demand. While there is no required minimum level of parking for the PT2 zoning where the site is located, the V&A is providing sufficient parking for all uses in the Breakwater and Pierhead precincts.

The V&A is providing services and infrastructure for micromobility to assist with the distribution of parking demand and to improve access to public transport, which is conveniently located close to the development site.

In conclusion, traffic impacts were assessed as being minor, with the existing road network having sufficient capacity to accommodate the proposed development and no additional road infrastructure being required. It is therefore recommended that the proposed development be approved without additional road infrastructure.

4.4.4 Civil Aviation

A Civil Aviation Compliance Statement is currently in progress, and the findings will be incorporated into the Draft Basic Assessment Report (BAR) to be circulated during the in-process public participation process.

4.5 Cumulative Impacts

4.5.1 Socio-Economic

The cumulative assessment indicates that the proposed mixed-use development will result in a combination of short-term negative and long-term positive impacts, with the overall cumulative effect considered positive. During the construction phase, temporary adverse impacts are anticipated, including noise and dust emissions, visual and heritage disturbance, and localised health and safety risks. These impacts are generally assessed as low in significance, short-term in duration, and largely reversible, particularly with the implementation of standard mitigation measures and compliance with applicable regulations.

In contrast, the operational phase is expected to generate sustained positive socio-economic impacts of moderate to high significance. These include ongoing contributions to gross output and GDP, long-term employment creation across skilled, semi-skilled, and entry-level positions, increased household income, and recurring government revenue at national and local levels. The development is also anticipated to stimulate the visitor economy through increased tourism potential and associated spending, reinforcing the economic vitality of the precinct. The inclusion of Atlantic Park and enhancements to the public realm will provide lasting amenity, open space, and visual benefits within a high-density urban environment, contributing positively to sense of place, social interaction, and overall urban quality.

When considered cumulatively alongside existing and planned developments within the precinct, the project is expected to integrate into an already established mixed-use and tourism-oriented node. Overall, considering the temporary and mitigable nature of construction-related impacts and the sustained economic, social, and amenity benefits during operation, **the cumulative impact of the proposed development is assessed as positive, with a long-term impact significance rating of "Medium-High"**.

4.5.2 Visual and Townscape Considerations

While the proposed development will be highly visible and will cause visual impact in that the character of the site will be changed from an underutilised one to a developed one; the scale of the surrounding buildings, as well as the proposed (and approved) adjacent buildings, will provide a certain degree of visual screening. Short term impacts in terms of the construction of the seawall and Parcel O, are expected to be most disruptive. However, in the long-term, the proposed development will form part of the "infill" development, in line with the precinct plan that has evolved with heritage and visual considerations in mind. Thus, the development will constitute a continuation of the skyline in this part of the V&A; will create a far more positive pedestrian-orientated interface; and should create a highly positive connection to the water's edge. Together, these are expected to continue the established promenade pattern along the Atlantic Seaboard suburbs of Cape Town. The intended enhancements to the public realm will further provide amenity, open space, and visual benefits within the intended high-density urban environment, thus contributing positively to sense of place and townscape.

Overall, the cumulative impact of the development is assessed to be positive, and of "Low" significance in the long term—especially with the incorporation of the suggested mitigation.

4.5.3 Combined Heritage Considerations

In addition to the current Breakwater North Phase 1B proposed development, north of Victoria Wharf, the assessment of cumulative heritage impacts must also consider the approved Granger Bay Phase 1 development; the approved V&AW rezoning; and the approved Breakwater North Phase 1A proposed development. Viewed in the context of the larger approved development in Granger Bay, and given that the proposed development is expected to also provide substantial socio-economic, townscape, and public open space benefits, these provide an offset to any potential negative heritage impacts. In addition, the site itself has limited intrinsic heritage significance within this part of the V&A Waterfront landholding. Accordingly, when the potential negative heritage effects are considered in the larger context and together with the benefits of the proposed development, and provided that the recommended mitigation and optimisation measures are implemented, the overall **cumulative heritage-related impact is assessed as "Low" positive.**

Furthermore, the o**verall cumulative visual impacts** associated with the proposed mixed-use development—as assessed by the Townscape and Visual Specialist—were likewise **found to be of "Low" (positive) significance**. While the intervention will be highly visible and will cause visual impact in that the character of the site will be changed from an underutilised one to a developed one; the scale of the surrounding buildings, as well as the proposed (and approved) adjacent buildings will provide a certain degree of visual screening. Short term impacts in terms of the construction of the seawall and, in particular, Parcel O have been discussed, but in the long-term the proposal will form part of the "infill" development in line with the precinct plan that has evolved with heritage and visual considerations in mind. Thus, the proposal will constitute a continuation of the skyline in this part of the V&A. In addition, the proposal will create a far more positive pedestrian-orientated interface, as well as a highly positive connection to the water's edge, which shall continue the established promenade pattern along the Atlantic Seaboard suburbs of Cape Town. The intended enhancements to the public realm will provide amenity, open space, and visual benefits within the intended high-density urban environment, contributing positively to sense of place and townscape.

Overall, the cumulative heritage impact of the proposed development is assessed to be of "Low", positive, significance in the long term—especially with the incorporation of the suggested mitigation measures.

4.6 No-Go Alternative

The No-Go Alternative refers to the potential impacts associated with not pursuing this development, or "doing nothing".

4.6.1 Marine environment

All potential impacts to the marine system resulting from the proposed development are likely to be assessed "Insignificant" due to no anticipated direct disturbance or removal of natural vegetation or marine habitat, or changes to hydrodynamic function or water quality. As such the impact of doing nothing is likewise assumed to be **"Insignificant"**.

4.6.2 Socio-Economic

From a socio-economic perspective, should this development not occur, a few minor negative construction and operation phase impacts would be avoided. Given the "**Very Low**" and "**Insignificant**" nature of the negative construction phase impacts (assuming mitigation) the avoidance of such impacts would likely be an insignificant benefit.

If the no-go alternative were to proceed, and the proposed mixed-use development were not implemented, the area would forgo a range of sustained positive socio-economic and amenity-related benefits. These avoided benefits would include the long-term contribution to GDP through operational activities, ongoing employment opportunities across skilled, semi-skilled, and entry-level positions, and the associated household income generation within the regional economy. The stimulus to the visitor economy through increased accommodation capacity, retail and hospitality spending, and enhanced destination appeal would likewise not materialise, limiting the precinct's potential to strengthen Cape Town's tourism offering. In addition, government would not realise the recurring fiscal benefits associated with property rates, VAT, PAYE, and corporate income taxes generated during operation. From an urban design and amenity perspective, the opportunity to introduce green open space and an enhanced public realm, including improved vistas and pedestrian connectivity, would be lost, reducing the potential to expand accessible open space within a high-density urban environment. Collectively, the no-go alternative would represent a missed opportunity for sustained economic growth, skills development, public realm enhancement, and long-term value creation within the precinct and the broader regional economy.

Should the 'no-go' alternative be deemed favourable, the site will remain the same, and none of the above-mentioned negative impacts on the local environment would take place. However, none of the socio-economic benefits of the project would be realised (contribution to GDP, employment, household income, skills development, government revenues, visitor expenditure, and amenity value) with the lost benefits outweighing the avoided impacts. This alternative is therefore a net loss in terms of opportunity cost. Since positive impacts would outweigh the negative impacts, the construction and operation of the proposed mixed-use development is the preferred option over the 'no-go' alternative (i.e., it is preferrable form a socio-economic perspective that the proposed mixed-use development be authorised). **Consequently, the combined impact of doing nothing has been rated to be of "Medium" negative significance. See the table below.**

LOSS OF POTENTIAL SOCIO-ECONOMIC BENEFITS	
Alternative:	**Preferred**
1. Potential impact and risk:	
Nature of impact:	**Negative; Long-term**
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Low
Probability of occurrence:	Probable
Degree to which the impact may cause irreplaceable loss of resources: **(Intensity)**	Medium
Degree to which the impact can be reversed:	Non-reversable
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to mitigation:	**N/A**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**MEDIUM NEGATIVE**
Degree to which the impact can be avoided:	**N/A**
Degree to which the impact can be managed:	**N/A**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation**:**	**N/A**
Residual impacts:	**N/A**
Cumulative impact post mitigation:	**N/A**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**N/A**

4.6.3 MARITIME ARCHAEOLOGICAL AND/OR SUBMERGED PRE-COLONIAL ARCHAEOLOGICAL HERITAGE RESOURCES

As the No Go scenario will merely constitute a continuation of the status quo, in which potential archaeological resources contained within the sub-fill material will remain undisturbed, it is assumed that impacts associated with the No Go Alternative will be "Insignificant".

4.6.4 VISUAL CONSIDERATIONS AND IMPACTS

The specialist study found that the site is visually confined, with impacts largely limited to within its own boundaries and, to a lesser extent, the immediate surrounding area (within a 2 km radius). This is due to strong natural constraints, including the sea, the ridgelines of Lion's Rump/Signal Hill, and the site's flat, reclaimed position on the edge of a coastal shelf.

Maintaining the status quo would further entrench the site's underutilized, vacant, and derelict condition. At the same time, the V&A Waterfront plans to develop an expansive new precinct at Granger Bay and the Breakwater, involving investment in the surrounding area. In this context, leaving the site undeveloped would likely become untenable, given the scale of approved development on adjacent land parcels.

Although the site currently has low townscape, visual, and sense-of-place significance, the no-go option would perpetuate a spatial, townscape, and visual "dilution" of positive elements in the area—elements that could otherwise be enhanced through appropriate development. As surrounding development progresses, it is unlikely that the site could remain in its current condition for more than two years.

The no-go alternative is therefore not considered viable, given the site's current state and increasing development pressure in the immediate vicinity, with an impact significance of "Insignificant", per the table below.

VISUAL AND TOWNSCAPE IMPACT RESULTING FROM MAINTAINING THE STATUS QUO	
Alternative:	**Preferred**
1. Potential impact and risk:	
Nature of impact:	**Neutral; Long-term**
Extent and duration of impact:	Local; Long-term
Consequence of impact or risk:	Very Low
Probability of occurrence:	Improbable
Degree to which the impact may cause irreplaceable loss of resources: **(Intensity)**	Low
Degree to which the impact can be reversed:	Non-reversable
Indirect impacts:	Direct and indirect impacts were not separated (assessed as same impact).
Cumulative impact prior to mitigation:	**N/A**
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**INSIGNIFICANT**
Degree to which the impact can be avoided:	**N/A**
Degree to which the impact can be managed:	**N/A**
Degree to which the impact can be mitigated:	**N/A**
Proposed mitigation**:**	**N/A**
Residual impacts:	**N/A**
Cumulative impact post mitigation:	**N/A**
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	**N/A**

4.6.5 Combined Heritage Considerations

While the 'no-go' alternative would avoid certain short-term negative impacts, it would also forfeit substantial and sustained environmental, visual, townscape and socio-economic benefits.

The environmental implications of not undertaking futureproofing of the shoreline protections should not be under-estimated. Moreover, what should be a public coastal space of very high significance is currently not much more than a backyard condition. The opportunity to fund the coastal protections and a substantial public open space development, which would ultimately link through to the Mouille Point – Sea Point coastal promenade is of local, regional and national benefit.

Potential Heritage impacts associated with the "No-Go" Alternative were, therefore, found to be of "Low", negative, significance

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1 PROVIDE A SUMMARY OF THE FINDINGS AND IMPACT MANAGEMENT MEASURES IDENTIFIED BY ALL SPECIALISTS AND AN INDICATION OF HOW THESE FINDINGS AND RECOMMENDATIONS HAVE INFLUENCED THE PROPOSED DEVELOPMENT.

1.1 OVERVIEW

The proposed mixed-use development by the V&A Waterfront within the V&A Waterfront Cape Town has been assessed through a BA Process. The evaluation of potential impacts and benefits of the proposed development was informed by several specialist assessments, including a Heritage Impact Assessment (HIA), Archaeology Impact Assessment (AIA), Visual and Townscape Impact Assessment (VIA), Socio-economic Impact Assessment (SEIA), Marine Ecology Compliance Statement and Traffic Impact Statement (TIS). These included impacts and benefits on the environment; surrounding community members; heritage, visual and archaeological resources; and economic receptors, ranging from the level of individual workers/households, through to the broader regional and national government. The final development layout, for which the impact management, avoidance, mitigation, and optimisation measures have been prescribed, is shown in Figure 37 below. Note that a Civil Aviation Compliance Statement is currently in progress, and the findings will be incorporated into the Draft BAR to be circulated during the in-process public participation process.

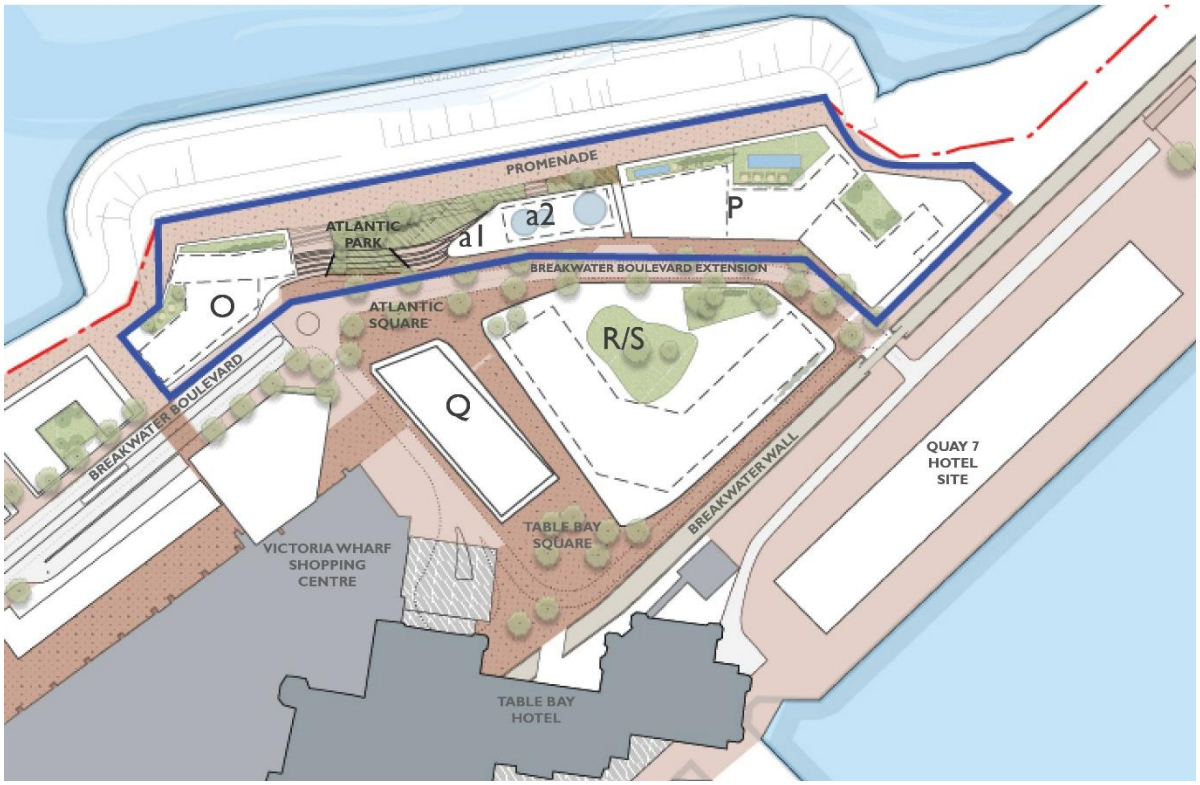

Figure 37. Proposed development layout and design for this project. This phase includes Block P, O and a1 & a2, Atlantic Park and the Promenade.

The V&A Waterfront is a key mixed-use tourism and commercial precinct within Cape Town's working harbour and is one of the city's primary visitor destinations, playing an important role in supporting

tourism expenditure, employment, and broader economic activity within Cape Town and the Western Cape. Within this context, the proposed development is considered both needed and desirable, as it responds to the demand for additional mixed-use development opportunities within the Cape Town's inner city and the V&A Waterfront Precinct; is in close proximity to existing amenities and facilities; and is expected to generate significant socio-economic, tourism, urban regeneration, and public amenity benefits.

Importantly, the site represents one of the few remaining, strategically located, parcels within the precinct suitable for this type of mixed-use development, with this suitability further strengthened by the fact that it is already subject to existing development rights. At present, the site is underutilised and of limited economic or cultural value, being largely used for parking and temporary storage. Its redevelopment will therefore better utilise this valuable (previously transformed) inner-city land within an established urban precinct. In addition, existing service infrastructure will be utilised, meaning no major bulk infrastructure upgrades are required. From a traffic perspective, impacts were assessed as minor, with the existing road network having sufficient capacity to accommodate the proposed development and no additional road infrastructure being required.

From a planning and policy perspective, the development aligns with the intent and objectives of relevant national, provincial, and local legislation, as well as applicable spatial planning policies, frameworks, and plans, including the City of Cape Town's Densification Policy. It is also consistent with the current zoning of the site, i.e., Mixed Use 3 (MU3).

From an ecological perspective, the site is located within a built-up, highly transformed, urban area on reclaimed land (inherently artificial) and therefore does not support natural vegetation, aquatic features, or faunal habitat. Consequently, no terrestrial or aquatic biodiversity impacts are anticipated. These themes were thus screened out, with no further specialist studies required. However, due to its proximity to the coastal and marine environment, a marine specialist was consulted, which similarly concluded that the no significant impacts on the coastal and marine environment are expected, provided that appropriate mitigation measures are implemented.

Taken together, the specialist studies confirm that all potential negative impacts associated with the development can be effectively avoided, managed, or mitigated. As a result, besides impacts on submerged pre-colonial archaeological resources (which has a post-mitigation significance of "Medium" negative), all residual negative impacts associated with the construction phase could be reduced to a significance between "Low" and "Insignificant". Furthermore, despite the "Medium" negative significance rating, the archaeological specialist stated that the development can be considered archaeologically acceptable and can be authorised, provided that the mitigation measures are implemented. **Consequently, the specialists unanimously found that the negative impacts associated with the construction phase DO NOT present a barrier to authorisation—which is further exemplified by the fact that NO negative operational phase impacts were identified.**

More importantly, the potential benefits afforded by the development throughout the construction and operational phase, are predicted to outweigh the negative impacts. Most positive impacts are assessed as at least of "Medium" positive significance both before and after optimisation measures are applied, with one construction phase impact and six operational impacts assessed as being of "High" positive significance with appropriate optimisation measures. These positive impacts relate primarily to socio-economic benefits, including employment generation during both the construction and operational phases, increased tourism activity, investment and revenue generation, improved public spaces and facilities, and enhancement of the character of the precinct.

The cumulative impact assessments echoed the above trend, with Socio-Economic, Visual/Townscape, and Heritage specialists all assessing cumulative impacts to be of positive significance. These range from "Low" positive for Visual/Landscape and Heritage, to "Medium-High" positive, for socio-economic receptors.

In terms of the assessment of the No-Go (do-nothing) scenario, the findings indicate that maintaining the status quo would make no difference to the site's value for certain receptors, specifically Marine, Archaeological, and Visual and Townscape receptors, and was therefore rated as "Insignificant" for these aspects. However, both the socio-economic and heritage specialists found that continued underutilisation of the site would be undesirable and would result in a deterioration of its current condition, as well as the loss of potential benefits. The socio-economic assessment assigned a "Medium" negative significance rating which reflects, in particular, the foregone benefits associated with the No-Go scenario. The heritage assessment assigned a "Low" negative significance rating due to the underutilisation of the site. These findings further highlight the importance of better utilising the site and support the proposed mixed-use development.

In summary, the combined findings of all specialist studies indicate that the proposed development is acceptable from an environmental, socio-economic, heritage and visual perspective, subject to the implementation of the prescribed mitigation measures, and should be approved. It is supported by strong socio-economic benefits and improvements to the character of the area, which outweigh the residual negative impacts.

1.2 SUMMARY OF THE IMPACT ASSESSMENT

A summary of all positive and negative impacts identified by the specialists, together with their significance ratings before and after mitigation and optimisation measures, is provided in the table below. This is followed by a more detailed breakdown of the findings of each study, and how the proposed avoidance/management/mitigation/optimisation measures influenced the outcomes of each assessment, and the development.

Impact	Pre-Mitigation/Optimisation Significance	Post-Mitigation/Optimisation Significance
Construction Phase		
Marine Impacts		
Impact of Pollution on the Marine Environment	**INSIGNIFICANT**	**INSIGNIFICANT**
Socio-economic Impacts		
Impact on gross output and GDP	**MEDIUM-POSITIVE**	**MEDIUM-HIGH POSITIVE**
Impact on employment	**MEDIUM-POSITIVE**	**HIGH POSITIVE**
Impact on household income	**MEDIUM-POSITIVE**	**MEDIUM-HIGH POSITIVE**
Impact on government revenues	**MEDIUM-POSITIVE (Optimisation Not Applicable)**	
Impact associated with noise and dust pollution	**LOW NEGATIVE**	**VERY LOW NEGATIVE**
Impact associated with physical health and safety concerns	**LOW NEGATIVE**	**VERY LOW NEGATIVE**

Archaeological Impacts		
Impact on maritime archaeological resources.	**MEDIUM-HIGH NEGATIVE**	**LOW NEGATIVE**
Impact on submerged pre-colonial archaeological resources	**HIGH NEGATIVE**	**MEDIUM NEGATIVE**
Visual Impacts		
Impact on sense of place (visual) and townscape resources	**LOW NEGATIVE**	**VERY LOW NEGATIVE**
Operational Phase		
Socio-economic Impacts		
Impact on gross output and GDP	**MEDIUM-HIGH POSITIVE**	**HIGH POSITIVE**
Impact on employment	**MEDIUM-HIGH POSITIVE**	**HIGH POSITIVE**
Impact on household income	**HIGH POSITIVE**	**HIGH POSITIVE**
Impact on government revenues	**HIGH-POSITIVE (Optimisation Not Applicable)**	
Impact on skills development	**LOW POSITIVE**	**MEDIUM POSITIVE**
Impact on public open space and amenity value	**MEDIUM-HIGH POSITIVE**	**HIGH POSITIVE**
Impact on the visitor economy	**MEDIUM-HIGH POSITIVE**	**HIGH POSITIVE**
Visual Impacts		
Impact on sense of place (visual) and townscape resources)	**LOW POSITIVE**	**MEDIUM**
Cumulative Impacts (With and Without Mitigation/Optimisation)		
Socio-Economic Considerations	**MEDIUM-HIGH POSITIVE**	
Visual and Townscape Considerations	**LOW POSITIVE**	
Combined Heritage Considerations (Incl. Socio-Economic, Archaeological, and Visual and Townscape Considerations).	**LOW POSITIVE**	
The No-Go Alternative (Mitigation/Enhancement Not Applicable)		
Marine Considerations	**INSIGNIFICANT**	
Socio-Economic Considerations	**MEDIUM NEGATIVE**	
Archaeological Considerations	**INSIGNIFICANT**	
Visual and Townscape Considerations	**INSIGNIFICANT**	
Combined Heritage Considerations (Incl. Socio-Economic, Archaeological, and Visual and Townscape Considerations).	**LOW NEGATIVE**	

1.3 Marine Considerations

1.3.1 Construction and Operational Phases

The proposed development is located within the V&A Waterfront on reclaimed land within the Port of Cape Town in Table Bay, a highly modified coastal and marine environment. Table Bay forms part of the productive Southern Benguela system and supports a range of marine species; however, the immediate site is fully transformed, physically separated from the marine environment by existing coastal infrastructure, and has no functional connectivity to marine habitats. No marine habitats or associated species are present on or directly adjacent to the site, and marine sensitivity is therefore very low.

Given this context, no direct impacts on marine ecology, water quality, or coastal processes are expected. Potential construction-related risks are limited to indirect pollution pathways such as accidental spills or contaminated runoff, but these are considered highly unlikely and insignificant due to the site's separation from the marine environment and existing containment infrastructure. Overall, potential negative impacts on the marine environment were found to be expected to be "**Insignificant**" during both construction and operation and can be effectively managed through standard mitigation and construction controls.

The mitigation measures were largely prescribed to prevent pollution or spillage of harmful substances into the marine environment. Consequently, the only influence these will have on the development will pertain to additional construction-phase "due-diligence" efforts.

1.4 Socio-Economic Considerations

The proposed development is located within this high-demand tourism and economic node and is aligned with broader city trends by supporting mixed-use urban growth, employment creation, and continued strengthening of Cape Town's tourism and service-based economy.

1.4.1 Construction Phase

The construction phase is expected to have several benefits, ranging from "**Medium**" Positive to "**High**" Positive after optimisation measures have been applied. It is expected to generate significant but temporary economic stimulation through direct, indirect, and induced effects. Direct impacts arise from construction expenditure on labour, materials, equipment, and professional services. Indirect impacts occur through supply chain activity, while induced impacts result from household spending of wages within the broader economy. Total economic output is estimated at approximately R4.3 billion, with a GDP contribution of about R1.7 billion once all effects are included. This represents a temporary but substantial contribution to national and regional economic activity. The project is expected to support approximately 5 100 temporary jobs across direct, indirect, and induced effects. Employment will span skilled, semi-skilled, and low-skilled categories, with opportunities distributed across construction, services, and supply chain sectors.

In addition to on-site employment, further jobs will be supported in manufacturing, transport, logistics, equipment supply, and professional services linked to the construction activity. The construction phase will increase household income through wages earned from direct and indirect employment. This is expected to generate approximately R856 million in additional income, improving disposable income, supporting basic needs, and contributing to local economic activity through re-spending effects. Government revenue will increase temporarily through VAT, PAYE, corporate taxes, fuel levies, and customs duties at national level, as well as municipal income from building plan fees, service charges, and development contributions. While these fiscal benefits may

be moderate to substantial during construction, they are temporary and linked directly to the construction period and capital expenditure of the project.

However, there will also be temporary negative impacts during the construction phase, although these are expected to be of "**Very Low**" Negative significance after mitigation has been implemented. Further clarification is as follows:

The construction phase will generate temporary noise and dust impacts associated with site clearance, excavation, material transport, and building activities. These impacts are expected to be localised, short term, and typical of construction activities of this nature—and were thus assessed to be of "**Low**" negative significance. However, with standard mitigation measures, including dust suppression, controlled vehicle speeds, appropriate material storage, and regulated working hours, these impacts are expected to remain within acceptable limits, thus reducing the significance to "**Very Low**". The impacts will also be confined largely to the construction site and immediate surroundings, with no long-term effects once construction is completed. Construction activities also present short-term health and safety risks for workers and the public, including occupational hazards (e.g. machinery accidents, falls, dust exposure) and public safety risks related to site access, traffic, and construction activities. This impact was thus assessed to be of "**Low**" negative significance before mitigation. However, these risks can be effectively managed through compliance with occupational health and safety regulations, implementation of site access controls, use of personal protective equipment, dust and noise management, and regular safety training. With these measures in place, impacts are expected to remain manageable for the duration of construction, therefore resulting in a "**Very Low**" negative impact significance.

1.4.2 Operational Phase

The operational phase of the proposed development is expected to result in sustained positive socio-economic impacts, ranging from "**Medium**"-to-"**High**" positive significance with the implementation of optimisation measures. These benefits arise from ongoing direct, indirect, and induced economic activity associated with the mixed-use development.

The project is expected to generate approximately R311 million in annual gross output and contribute around R159 million to GDP, driven by hotel, residential, retail, and associated commercial activities. Additional multiplier effects will occur through supply chains and household spending, supporting broader economic circulation. A total of approximately 369 permanent jobs are expected to be created across skilled, semi-skilled, and low-skilled categories in hospitality, property management, security, maintenance, retail, and professional services. This should, therefore, generate sustained household income of approximately R74 million and support ongoing local employment and economic stability. Government revenues should also increase on a recurring basis through corporate tax, PAYE, VAT, property rates, municipal service charges, and tourism-related levies. These contributions provide a stable fiscal benefit at both local and national levels.

The development will also support skills development through on-the-job training and workplace exposure in hospitality, facilities management, and related services, improving employability and career progression opportunities, particularly for entry-level workers and youth. In addition, the inclusion of Atlantic Park and enhanced public realm infrastructure will improve public open space provision, supporting recreation, wellbeing, and urban amenity in a high-density area. These spaces also contribute to environmental quality, social interaction, and local economic activity. Finally, the development will positively contribute to the visitor economy by increasing accommodation capacity, retail and leisure offerings, and public space activation within the V&A Waterfront. This is expected to increase visitor numbers, dwell time, and spending, strengthening Cape Town's tourism sector over the long term.

The proposed optimisation measures have therefore been formulated to enhance the benefits already expected from the development, and include prioritising the employment of local labour, partnering with local businesses, promoting inclusive hiring practices, and optimising the design of the open-space portions for the purposes of safety and inclusivity (such as through installing adequate lighting), etc. Consequently, these measures are largely not expected to alter the physical development layout (besides perhaps to optimise safety and inclusivity benefits) and are rather aimed at positively influencing/impacting the human resources aspects from planning, through to operation.

1.5 Archaeological Considerations

1.5.1 Construction Phase

The proposed development of Phase 1B project is likely to include substantial earthworks in the underlying fill for the hotel and residential elements of the project. Earthworks that intersect with the former seabed underlying the artificial fill material, therefore have the potential of negatively impacting both maritime and submerged pre-colonial resources, respectively. With the implementation of appropriate mitigation measures, these can be reduced to a significance of "**Low**" negative, and "**Medium**" negative, respectively.

In the case of maritime archaeology, impacts will be direct and may result in the damage to, or destruction of archaeological sites and/or artefacts. Impacts will be local in extent and will occur only within the footprint of development-related activities. However, these impacts will be permanent, since archaeological sites and materials are a non-renewable resource, and cannot be recovered if damaged. Since it is unknown whether there are any wrecks in the Granger Bay Phase 1B project area, it is difficult to assess impact significance—which depends to a large degree on the archaeological value of the affected site/material. It is, however, likely that impacts associated with damage/destruction of a previously undiscovered wreck will be of "**Medium-High**", which can be reduced to a significance of "**Low**" with the implementation of suitable mitigation measures.

As above, impacts to submerged pre-colonial archaeological resources are expected to will be direct, and may result in the damage to, or destruction of archaeological sites and/or artefacts. Impacts will be local in extent, occurring only within the footprint of development-related activities, but they will be permanent. It is almost certain, that at times of lower sea levels, our ancestors utilised and occupied the present floor of Table Bay and left traces of their presence in and on the land. If such archaeological material has survived the subsequent marine transgressions and is sequestered in the seabed underlying the Phase 1B project area, the project-related impacts on such resources is likely to be of "**High"** negative significance. However, this can be reduced to a negative significance of "**Medium**" with the implementation of appropriate mitigation measures.

The proposed mitigation measures are therefore targeted towards monitoring any deep earthworks, to rapidly identify the presence of archaeological resources—thus enabling the temporary stoppage of work and recovery of these resources. For these works to be optimised, staff training and visits from an archaeologist will be required. An established methodology for ensuring that appropriate excavation, preservation, etc. of artifacts takes place (should they be identified) must also be established. Therefore, while not altering the development's design, these measures will necessitate the deployment of additional manpower resources, training, and thus costs. Furthermore, the potential for temporary stoppage of the construction works could also have implications on construction timelines—therefore potentially leading to additional financial implications.

1.6 VISUAL AND TOWNSCAPE CONSIDERATIONS

The site is located within the V&A Waterfront precinct on the edge of Cape Town's city centre, an area defined by its coastal setting, Table Bay frontage, and visual relationship with Signal Hill and the surrounding mountain backdrop. The V&A Waterfront forms a distinct urban area with a recognised sense of place, characterised by a mix of historic harbour elements, commercial development, and public access to the water's edge. The site itself is located within a highly transformed portion of the precinct, largely comprising reclaimed land and temporary land uses, with limited intrinsic townscape value. Its primary visual significance relates to its relationship with surrounding elements, including the Breakwater Wall, Table Bay, and key visual corridors such as Breakwater Boulevard and views towards Robben Island. Public access to the coastal edge and visual connectivity between heritage elements and the sea are important characteristics of the area. The proposed development is located within this established urban and waterfront context and has been informed by surrounding visual and townscape patterns, including building scale, views, and spatial relationships.

1.6.1 CONSTRUCTION PHASE

While construction activities will temporarily alter the visual character of the site, these impacts will be confined to the construction phase. The site's baseline condition is also already influenced by adjacent construction works activity. Consequently, this impact is expected to be of "Low" negative significance without mitigation, which can be lowered to "**Very Low**" negative significance, with the implementation of appropriate mitigation measures.

While not altering the design of the development, the proposed mitigation measures are largely aimed at minimising the degree of visual disturbance during construction, through hoarding off the site (surrounding it with temporary, visually impenetrable, wooden walls), preventing unnecessary destruction of existing features, and ensuring that site(s) are adequately rehabilitated/managed following the completion of works. Consequently, the main implications of these measures are expected to be cost-related (both financially, and in terms of manpower) and will influence the ways in which construction works take place.

1.6.2 OPERATIONAL PHASE

The development itself is expected to result in a positive impact on sense of place by enhancing the quality of the waterfront environment and strengthening visual and physical connections to the sea. It will improve the public realm through an active promenade, improved access, and a sensitively designed urban form that responds to the coastal setting. Overall impacts on the existing townscape will be localised, and of "**Low**" positive significance, with benefits including improved accessibility, amenity, and urban coherence. However, this positive impact can be raised to a significance of "**Medium**" positive, through the implementation of the combination of a series of essential mitigation measures and recommended/best practice optimisation.

The essential mitigation measures pertain to adherence to urban design and architectural guidelines and coordinated building and landscape design to support a coherent and distinctive sense of place. The recommended/best practice optimisation measures will further enhance these outcomes through appropriate landscape treatment of Atlantic Park, incorporating coastal vegetation and public amenity elements that reflect its waterfront setting, as well as the preparation of a Landscape Plan and Elevations for future SDP applications.

Consequently, if implemented, the proposed measures are expected to/already have greatly influenced the final design of the proposed mixed-use development and have established the parameters within which the developers must (for essential mitigation measures), and could (for optimisation measures) operate within to finalise the development plan.

1.7 Integrated Heritage Considerations

The site forms part of the outer edge of the V&A Waterfront core area, which contains layered historical development including early coastal infrastructure, breakwaters, and adjacent heritage resources such as Somerset Hospital, Fort Wynyard, and the Breakwater Wall. While these elements contribute to the broader heritage context and sense of place, the site itself is largely reclaimed land with previous disturbance and temporary uses and has limited intrinsic heritage value.

The primary heritage significance of the site relates to its visual and spatial relationship with surrounding heritage resources and the coastal edge, including views towards Table Bay and Robben Island, as well as pedestrian connectivity along the waterfront. The development has been informed by this context to ensure compatibility with the surrounding historic urban and coastal environment. The site has no other intrinsic heritage significance and is significant largely in its relationship to surrounding heritage resources and contextual character, particularly its position along the coastline. No operational phase impacts are expected on heritage resources, with the exception of positive impacts during operation on visual and townscape receptors.

The site has the potential, albeit low, to contain maritime archaeological and/or submerged pre-colonial archaeological heritage resources below the modern fill. Should such resources be encountered during construction, particularly during excavation within historic fill layers, they could be affected. However, these potential impacts can be effectively managed through archaeological monitoring and chance-find procedures. No operational impacts on archaeological resources are anticipated. Furthermore, despite the "negative" significance rating, the archaeological specialist stated that the development can be considered archaeologically acceptable and can be authorised, provided that the mitigation measures are implemented.

Mitigation measures applicable to heritage are detailed within the sections pertaining to socio-economic, archaeological, and visual/townscape receptors, respectively. Together, they have (and will) influence both the design of the development, as well as they manner in which the construction works will be undertaken.

1.8 Traffic

1.8.1 Construction and Operational Phases

Construction phase traffic impacts are likely to be **insignificant** and have therefore been screened out of the assessment. During operation, the proposed development will be accessed via Breakwater Boulevard and Granger Bay Boulevard, which have sufficient capacity to accommodate the anticipated traffic. The proposed uses are expected to generate traffic outside existing peak demand periods and primarily in the counter-peak direction, while the relatively small scale of the development will limit additional traffic demand. No changes or upgrades to the existing road network are required. Parking will be accommodated through the V&A Waterfront's standard approach, including on-site parking and use of nearby parking garages, while existing public transport and micromobility infrastructure will support alternative modes of transport. Overall, traffic impacts are assessed as **minor**.

2 LIST THE IMPACT MANAGEMENT MEASURES THAT WERE IDENTIFIED BY ALL SPECIALISTS THAT WILL BE INCLUDED IN THE EMPR

Mitigation / impact management measures for mitigating negative impacts were classified as either:

- **Essential:** Mandatory measures that must be implemented and are non-negotiable. These measures are assumed to be implemented in the "with mitigation" impact scenario and are therefore incorporated into the post mitigation impact assessment significance rating; or
- **Best Practice / Recommended:** Non-mandatory measures that should be implemented where feasible and appropriate. Alternative measures or approaches may be adopted, provided that the required environmental outcome is still achieved and a clear and defensible motivation is provided for not implementing the recommended measure. These do not affect the overall impact rating if not implemented.

Optimisation measures aimed at enhancing potential benefits are generally considered Best Practice / Recommended and are non-mandatory.

Measures have separated by specialist study, and by construction and operation phase (where applicable):

2.1 Marine Considerations

Construction Phase

Essential Mitigation Measures:

- Intentional disposal of any substance into the environment is strictly prohibited, while accidental spillage must be prevented, contained and reported immediately.
- All hazardous substances must be accompanied by a permit, a hazard report sheet, and a first aid treatment protocol and may only be handled by suitably trained operators.
- Spill kits must be available on site at all times, and staff must be trained in their proposed use.

2.2 Socio-Economic Considerations:

Construction Phase

Essential Mitigation Measures:

- Ensure full compliance with all relevant national and municipal policies, regulations, and guidelines regarding noise and dust management, particularly when working near roads, sensitive receptors, and existing infrastructure.
- Implement regular cleaning and maintenance of the construction site to prevent dust accumulation on surfaces, access roads, and surrounding areas.
- Cover or securely store loose construction materials, soil, and debris to prevent windblown dust.
- Adhere to occupational health and safety regulations as per the Health and Safety Plan for the project.
- Use personal protective equipment, implement site access controls, and dust and noise mitigation measures.
- Ensure regular safety training for personnel on site as per the health and safety plan.

Recommended/Best Practice Optimisation Measures:

- Promote local procurement and prioritise the employment of local labour, where feasible.
- Source construction materials, goods and services from local suppliers wherever practical.
- Where practical, support subcontracting opportunities for local SMMEs.
- Where possible, promote inclusive hiring practices.
- Where feasible, maximise local employment opportunities.
- Where possible, promote the participation of women, youth, and historically disadvantaged groups.

Operational Phase

Recommended/Best Practice Optimisation Measures:

- Promote local procurement and prioritise the employment of local labour, where feasible.
- Where practical, encourage partnerships with local businesses, tourism operators and cultural or event initiatives.

2.3 Archaeological Considerations

Construction Phase

Essential Mitigation Measures:

- Any groundworks on the Granger Bay Precinct Phase 1B site, to levels that may intersect with the former seabed must be subject to archaeological monitoring, with the necessary contingencies in place to allow the mitigation of shipwreck remains or pre-colonial archaeological material, should they be encountered. These contingencies may include the stoppage of work in the affected area until the necessary mitigation work has been concluded. Any such mitigation will be to the account of the developer.
- Monitoring visits should be conducted by a suitably experienced archaeologist at least once per week, but more regular visits may be required as excavations deepen, and the potential grows for encountering the interface with the former seabed.
- Archaeological information should be presented as part of the environmental training programme for all site staff and machine operators which will describe what sort of 30 archaeological items could be found on site, how to identify them, and the reporting procedure to follow should material be found when the archaeologist is not on site.
- Should anything of interest be found by construction staff, this must immediately be reported to the project ECO and site manager, and the monitoring archaeologist called to site to assess the find and establish whether any form of mitigation is required. The sorts of material that would trigger such a call is large structural wooded or iron remains, layers of historical refuse containing particularly glass and ceramics, the remains of any built structures (although these are not expected in this area) and rocky, sandy or cobbly strata that may represent the former seabed.

2.4 Visual and Townscape Considerations

Construction Phase

Essential Mitigation Measures:

- Limiting construction to within hoarded areas.
- Site rehabilitation and management following completion of the works.

- Preservation of elements to be retained, such as the existing palm trees in the central street island.

Operational Phase:

Essential Mitigation Measures:

- The urban design indicators and the Townscape and Architectural Recommendations/Commitments must be incorporated into the future SDP level elevations to ensure a sufficient sense of architectural resolution and materiality to conclude that the townscape indicators are adequately responded to in the proposal (to be assessed by the local authority, the City of Cape Town Municipality). **The Townscape and Architectural Recommendations/Commitments, are as follows:**

Ground-Level Activation and Promenade Interface

1. Activate ground floors of buildings along the sea facing promenade and limit the level change between the promenade and building terraces to a maximum of 2m, so as to facilitate surveillance onto the promenade while maintaining privacy of private terraces.
2. The promenade walkway must include seating and lighting to enhance public utilisation thereof.
3. Main pedestrian entrances of buildings directly off Breakwater Boulevard & Street to be as visible as possible from the sidewalk so as to animate the street space.
4. Limit vehicular and delivery access points off Breakwater Boulevard & Street as far as possible.
5. Screen unavoidable vehicular access or delivery entrances along Breakwater Boulevard & Street.

Heights and Massing: Buildings and Structures

1. Within the Breakwater Boulevard view corridor structures and buildings are limited to a maximum of 12.5 MSL
2. Sea-facing facades to be set back a minimum of 2m from the edge of the promenade so that buildings do not encroach onto the shared space character of the promenade.
3. Buildings with facades longer than ±20m should be articulated with vertical recesses or protrusions to break down their scale.
4. The seafront façade of Parcel O should setback at least once to lessen building massing facing the promenade.
5. The massing of Parcel O should be articulated through horizontal and vertical setbacks.

Architectural Materiality and Coastal Context

1. Façade textures of Parcels P and O should be articulated by means of balconies, pergolas and screens to break down the scale of the facades of these buildings.
2. Materials should be appropriate to a coastal promenade character while maintaining an overall coherence within the greater precinct.
3. Buildings should be differentiated from one another by a variety of textures, materials and detailing (avoid both a single typology and a broad mix of typologies)
4. Reduce fully glazed facades while utilising a pragmatic approach to maximizing ocean views.

5. The floorplate of the upper level of Parcel O should be inset and of a darker and / or different material to reduce perceived height from the public realm and in relation to the overall skyline.

Recommended/Best Practice Optimisation Measures:

- The landscape treatment of Atlantic Park should be designed in a way that is conscious of, and reflects, its unique sense of place, incorporating coastal vegetation and public amenity elements that reflect the positioning of the space at the waters' edge.
- Landscape Plan and Elevations incorporating these aspects to be produced for any future SDP applications (to be assessed by the local authority, the City of Cape Town Municipality).

List the specialist investigations and the impact management measures that will not be implemented and provide an explanation as to why these measures will not be implemented.

Mitigation and impact management measures for reducing negative impacts identified in the specialist studies were classified as either Essential (mandatory) or Best Practice / Recommended (non-mandatory), while optimisation measures aimed at enhancing potential benefits are all considered Best Practice / Recommended (non-mandatory).

As such, Best Practice / Recommended mitigation and optimisation measures are optional and will be implemented where feasible and practicable during construction and operation. However, some of these measures may not be implemented if they are not technically feasible, operationally practical, or not required to achieve acceptable impact levels.

The following measures fall within this non-mandatory category and are therefore not guaranteed for implementation:

2.5 Socio-Economic Considerations:

Construction Phase

Recommended/Best Practice Optimisation Measures:

- Promote local procurement and prioritise the employment of local labour.
- Source construction materials, goods and services from local suppliers wherever practical.
- Where practical, support subcontracting opportunities for local SMMEs.
- Where possible, promote inclusive hiring practices.
- Where feasible, maximise local employment opportunities.
- Where possible, promote the participation of women, youth, and historically disadvantaged groups.

Operational Phase

Recommended/Best Practice Optimisation Measures:

- Promote local procurement and prioritise the employment of local labour, where feasible.
- Where practical, encourage partnerships with local businesses, tourism operators and cultural or event initiatives.
- Where feasible, promote workforce development programmes.

2.6 VISUAL AND TOWNSCAPE CONSIDERATIONS

Operational Phase:

Recommended/Best Practice Optimisation Measures:

- The landscape treatment of Atlantic Park should be designed in a way that is conscious of, and reflects, its unique sense of place, incorporating coastal vegetation and public amenity elements that reflect the positioning of the space at the waters' edge.
- Landscape Plan and Elevations incorporating these aspects to be produced for any future SDP applications (to be assessed by the local authority, the City of Cape Town Municipality).

4.	Explain how the proposed development will impact the surrounding communities.

The proposed development is expected to positively impact surrounding communities through the creation of temporary and permanent employment opportunities, increased household income, skills development, and stimulation of the local economy. The development will support economic activity within the V&A Waterfront and broader Cape Town area through increased tourism, business activity, and associated supply chain benefits. The project will also improve public access and amenity through the provision of enhanced public open spaces, including Atlantic Park and upgraded promenade areas, contributing to recreation, wellbeing, and overall urban amenity. In addition, the development is expected to enhance the visual character and sense of place of the area through improved public realm design, waterfront access, landscaping, and integration with the surrounding coastal and urban environment. The development is also expected to strengthen the visitor economy and support surrounding businesses through increased visitor numbers and spending.

Potential negative impacts are largely limited to temporary construction-related disturbances such as noise, dust, traffic, and visual impacts, which can be effectively managed through the implementation of mitigation measures contained in the EMPr.

5.	Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.

Although climate change may influence the proposed development through increased storm intensity, sea level rise, coastal erosion, and changing rainfall patterns over the long term, due to the site's location within an existing protected and engineered urban coastal environment, the proposed development is not anticipated to be significantly affected by climate-related risks in the foreseeable future.

Potential climate-related risks were considered during the planning and design process, particularly in relation to the site's coastal setting and exposure to storm events and sea-level rise. Existing coastal protection infrastructure, including the rock revetments and engineered shoreline protection measures surrounding the site, already provide protection against wave action and coastal processes. In addition, the development design has taken coastal resilience and stormwater management into account to ensure that runoff, drainage, and potential coastal interface impacts are appropriately managed.

The proposed development therefore incorporates climate resilience considerations appropriate to its location and is not expected to result in significant climate-related risks or impacts.

6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.

There are no conflicting recommendations made by the specialists.

7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.

The findings and recommendations of the specialist studies were integrated throughout the BA process through ongoing consultation and collaboration between the EAP, specialists, and the Applicant. Specialist input informed both the assessment process and the refinement of the proposed development design to ensure that potential impacts were identified and, where possible, avoided or reduced from the outset. Several meetings were held between the EAP, specialists, and the Applicant during the design development process to ensure that specialist recommendations and mitigation measures were incorporated into the project design and planning from an early stage. This integrated approach assisted in reducing potential environmental, heritage, visual, and socio-economic impacts through design responses and management measures. Mitigation measures recommended by the specialists have been incorporated into the EMPr and essential mitigation measures will be implemented during the relevant phases of the proposed development. Please refer to S**ection 4 within Section H** above, for further detail.

8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.

The mitigation hierarchy, as indicated in Figure 38 below, was applied throughout the Basic Assessment process to determine the best practicable environmental option for the proposed development and to ensure that potential impacts were avoided, minimised, and appropriately managed.

Avoidance formed the primary approach to mitigation. The proposed development is located on a highly transformed and degraded site within an existing urban area that has no conservation value and contains no natural vegetation or intact habitat. The site consists of reclaimed land that has already been irreversibly altered from its natural state and is currently used for parking, storage, and related urban activities. In addition, the development design and layout were informed by specialist input to avoid or reduce potential impacts on surrounding heritage, visual, coastal, and public realm features from the outset. Where impacts could not be fully avoided, appropriate minimisation measures were developed through consultation between the EAP, specialists, and the Applicant during the design and assessment process. This integrated approach ensured that mitigation measures were incorporated into the project planning and design as early as possible.

Mitigation measures recommended by the specialists have been incorporated into the EMPr and will be implemented during the relevant phases of the proposed development to ensure that potential impacts remain low and manageable.

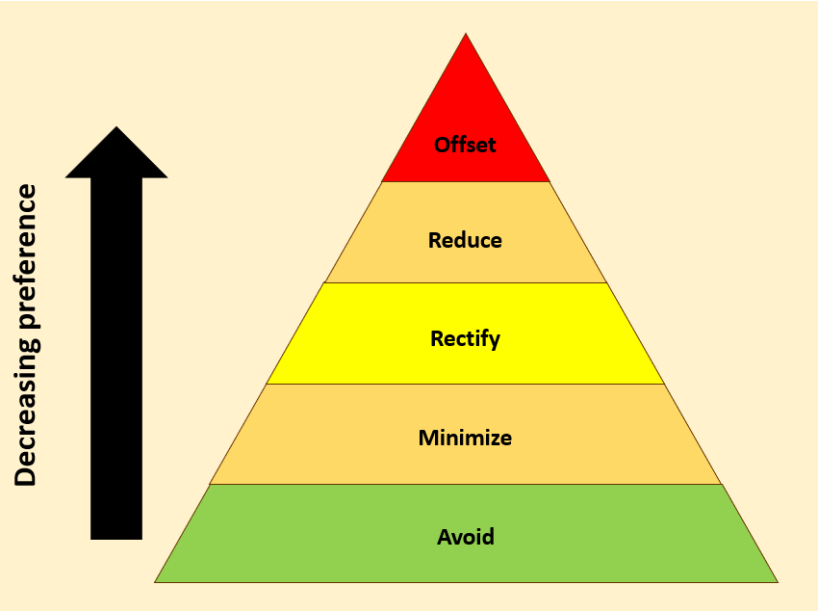

Figure 38.Mitigation hierarchy (Source: www.eco-intelligent.com).

SECTION J: GENERAL

1. ENVIRONMENTAL IMPACT STATEMENT

1.1.	Provide a summary of the key findings of the EIA.

The proposed mixed-use development within the V&A Waterfront, Cape Town, was assessed through a Basic Assessment (BA) Process informed by several specialist assessments, including a Heritage Impact Assessment (HIA), Archaeology Impact Assessment (AIA), Visual and Townscape Impact Assessment (VIA) and Socio-economic Impact Assessment (SEIA), together with a Marine Compliance Statement. The assessment considered potential impacts on the biophysical environment, heritage, visual and archaeological resources, socio-economic conditions, and the surrounding coastal and urban context throughout the project life-cycle.

The findings indicate that the proposed development is appropriate within the receiving environment and that potential negative impacts can be effectively managed through the implementation of mitigation and optimisation measures contained in the EMPr. The site is located within a highly transformed urban environment on reclaimed land and does not contain natural vegetation, aquatic features, or faunal habitat. As a result, no impacts on terrestrial biodiversity, aquatic biodiversity, plant species, or animal species are anticipated, and no specialist biodiversity studies were required.

The socio-economic assessment found that the proposed development will result in substantial positive socio-economic benefits during both the construction and operational phases. During construction, the development is expected to generate significant temporary economic activity, employment opportunities, household income, and government revenue through direct, indirect, and induced effects. Approximately 5 100 temporary jobs are expected to be supported, while the construction phase is estimated to contribute approximately R4.3 billion in economic output and around R1.7 billion to GDP. Temporary negative impacts associated with noise, dust, traffic, and health and safety risks are expected to remain localised, short term, and manageable through standard mitigation measures.

During operation, the development is expected to generate sustained positive economic benefits through ongoing tourism, residential, retail, hospitality, and commercial activity. Approximately 369 permanent jobs are expected to be created, together with ongoing household income generation, increased government revenue, and skills development opportunities. The proposed development will also improve public open space, amenity value, and public access through the inclusion of Atlantic Park, enhanced promenade areas, and improved public realm infrastructure. In addition, the development is expected to positively contribute to the visitor economy and strengthen the V&A Waterfront's role as a major tourism and economic node within Cape Town.

The heritage, visual, and archaeological assessments confirmed that the site itself has limited intrinsic heritage significance, as it largely comprises reclaimed and previously disturbed land. However, the site is important in terms of its visual and spatial relationship with surrounding heritage resources, the coastal edge, and views towards Table Bay and Robben Island. The proposed development has therefore been informed by the surrounding historic urban and coastal context, with building form, scale, layout, and public realm design responding to existing visual and heritage informants. No significant operational impacts on heritage resources are anticipated. Potential impacts on buried maritime archaeological or submerged pre-colonial archaeological resources during construction can be effectively managed through archaeological monitoring and chance-find procedures.

The visual and townscape assessment found that temporary construction-phase visual impacts will be low and localised and can be mitigated through appropriate construction management measures. During operation, the proposed development is expected to positively enhance the visual character and sense

of place of the area through improved public realm design, active waterfront interfaces, landscaping, enhanced promenade access, and improved visual and physical connections to the sea.

The marine assessment confirmed that the site has very low marine sensitivity, as it is physically separated from the marine environment by existing coastal infrastructure and has no functional connectivity to marine habitats. No direct impacts on marine ecology, coastal processes, or water quality are expected. Potential indirect construction-related risks, such as accidental spills or contaminated runoff, are considered "**Insignificant**" and can be effectively managed through standard environmental controls and mitigation measures.

Overall, the BA process found that the proposed development will result in substantial long-term positive socio-economic, public realm, tourism, and urban amenity benefits, while environmental, heritage, visual, and marine impacts are expected to remain minor, localised, and mitigable. The proposed development is therefore considered acceptable from an environmental, heritage, visual, social, and economic perspective, and authorisation is supported subject to the implementation of the essential mitigation and management measures contained in the EMPr.

1.2.	Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)

These maps have been attached as Appendix B2 to the BAR.

1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.

A summary of all positive and negative impacts identified by the specialists, together with their significance ratings before and after mitigation and optimisation measures, is provided in the table below.

Impact	Pre-Mitigation/Optimisation Significance	Post-Mitigation/Optimisation Significance
Construction Phase		
Marine Impacts		
Impact of Pollution on the Marine Environment	INSIGNIFICANT	INSIGNIFICANT
Socio-economic Impacts		
Impact on gross output and GDP	MEDIUM-POSITIVE	MEDIUM-HIGH POSITIVE
Impact on employment	MEDIUM-POSITIVE	HIGH POSITIVE
Impact on household income	MEDIUM-POSITIVE	MEDIUM-HIGH POSITIVE
Impact on government revenues	MEDIUM-POSITIVE (Optimisation Not Applicable)	
Impact associated with noise and dust pollution	LOW NEGATIVE	VERY LOW NEGATIVE
Impact associated with physical health and safety concerns	LOW NEGATIVE	VERY LOW NEGATIVE
Archaeological Impacts		
Impact on maritime archaeological resources.	MEDIUM-HIGH NEGATIVE	LOW NEGATIVE
Impact on submerged pre-colonial archaeological resources	HIGH NEGATIVE	MEDIUM NEGATIVE
Visual Impacts		
Impact on sense of place (visual) and townscape resources	LOW NEGATIVE	VERY LOW NEGATIVE

Operational Phase		
Socio-economic Impacts		
Impact on gross output and GDP	**MEDIUM-HIGH POSITIVE**	**HIGH POSITIVE**
Impact on employment	**MEDIUM-HIGH POSITIVE**	**HIGH POSITIVE**
Impact on household income	**HIGH POSITIVE**	**HIGH POSITIVE**
Impact on government revenues	**HIGH-POSITIVE (Optimisation Not Applicable)**	
Impact on skills development	**LOW POSITIVE**	**MEDIUM POSITIVE**
Impact on public open space and amenity value	**MEDIUM-HIGH POSITIVE**	**HIGH POSITIVE**
Impact on the visitor economy	**MEDIUM-HIGH POSITIVE**	**HIGH POSITIVE**
Visual Impacts		
Impact on sense of place (visual) and townscape resources)	**LOW POSITIVE**	**MEDIUM**
Cumulative Impacts (With and Without Mitigation/Optimisation)		
Socio-Economic Considerations	**MEDIUM-HIGH POSITIVE**	
Visual and Townscape Considerations	**LOW POSITIVE**	
Combined Heritage Considerations (Incl. Socio-Economic, Archaeological, and Visual and Townscape Considerations).	**LOW POSITIVE**	
The No-Go Alternative (Mitigation/Enhancement Not Applicable)		
Marine Considerations	**INSIGNIFICANT**	
Socio-Economic Considerations	**MEDIUM NEGATIVE**	
Archaeological Considerations	**INSIGNIFICANT**	
Visual and Townscape Considerations	**INSIGNIFICANT**	
Combined Heritage Considerations (Incl. Socio-Economic, Archaeological, and Visual and Townscape Considerations).	**LOW NEGATIVE**	

Taken together, the specialist studies confirm that all potential negative impacts associated with the development can be effectively avoided, managed, or mitigated. As a result, besides impacts on submerged pre-colonial archaeological resources (which has a post-mitigation significance of "Medium" negative), all residual negative impacts associated with the construction phase could be reduced to a significance between "Low" and "Insignificant". Furthermore, despite the "Medium" negative significance rating, the archaeological specialist stated that the development can be considered archaeologically acceptable and can be authorised, provided that the mitigation measures are implemented. **Consequently, the specialists unanimously found that the negative impacts associated with the construction phase DO NOT present a barrier to authorisation—which is further exemplified by the fact that NO negative operational phase impacts were identified.**

More importantly, the potential benefits afforded by the development throughout the construction and operational phase, are predicted to outweigh the negative impacts. Most positive impacts are assessed as at least of "Medium" positive significance both before and after optimisation measures are applied, with one construction phase impact and six operational impacts assessed as being of "High" positive

significance should optimisation measures be implemented. These positive impacts relate primarily to socio-economic benefits, including employment generation during both the construction and operational phases, increased tourism activity, investment and revenue generation, improved public spaces and facilities, and enhancement of the visual character of the precinct. The cumulative impact assessments echoed the above trend, with Socio-Economic, Visual/Townscape, and Heritage specialists all assessing cumulative impacts to be of positive significance. These range from "Low" positive for Visual/Landscape and Heritage, to "Medium-High" positive, for socio-economic receptors.

In terms of not implementing the development (the No-Go option), both the socio-economic and heritage specialists found that continued underutilisation of the site would be undesirable and would result in a deterioration of its current condition, as well as the loss of potential benefits. The socio-economic assessment assigned a "Medium" negative significance rating which reflects, in particular, the foregone benefits associated with the No-Go scenario. The heritage assessment assigned a "Low" negative significance rating due to the underutilisation of the site. These findings further highlight the importance of better utilising the site and support the proposed mixed-use development.

Overall, the preferred alternative is expected to result in strong net positive socio-economic outcomes and improvements to sense of place, visual character, and townscape quality, with benefits during both the construction and operational phases. These benefits outweigh the limited short-term, localised construction-related impacts, which can be effectively managed through mitigation. No operational negative impacts have been identified. The proposed development is therefore considered acceptable from an environmental, socio-economic, heritage, and visual perspective, subject to the implementation of the prescribed mitigation measures.

2. RECOMMENDATION OF THE EAP

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr

Impact management outcomes for the pre-construction, construction, and operational phases are provided below. These outcomes are informed by the Visual Impact Assessment, Heritage Impact Assessment, Archaeological Impact Assessment, Socio-Economic Impact Assessment, applicable legislation, best practice requirements and the EAP's own assessment. These outcomes have been included in the EMPr, together with the associated mitigation, optimisation, and management measures and actions intended to achieve the stated outcomes.

PLANNING AND DESIGN AND PRE-CONSTRUCTION ENVIRONMENTAL MANAGEMENT OUTCOMES

- Maintain a clear record of the site's pre-construction condition and any environmental changes or incidents using photographic record.
- Notify all registered and relevant I&APs of the commencement of the project and construction activities to allow increased stakeholder awareness and transparency, allowing affected parties to anticipate and respond to construction activities.
- Establish camp and laydown area to minimise impacts on the environment when developing new infrastructure and the development footprint are kept to demarcated development area.
- Minimise visual impacts through appropriate design controls and retained landscape elements.

CONSTRUCTION ENVIRONMENTAL MANAGEMENT OUTCOMES

- Provide environmental awareness training to ensure all onsite staff are aware and understands the individual responsibilities in terms of this EMPr to ensure effective implementation and compliance.
- Ensure overall Environmental Management to ensure compliance with the EMPr, EA and legislation and enable effective monitoring of compliance.
- Maximise positive and minimise negative socio-economic impacts associated with the development by prioritising local employment and procurement, supporting skills development, and promoting opportunities for local businesses and inclusive hiring.
- Maintain earthworks and dust management practices in a manner that ensures that public health and safety are assured and environmental, air and water quality degradation are minimised.
- Minimise noise and associated disturbance and nuisance to surrounding communities, workers, and wildlife.
- Ensure the Health and Safety of Staff by complying with the Occupational Health and Safety Act (OHSA) and through proper awareness, training and materials and equipment skills.
- Preserve good relations with neighbouring communities to ensure maximum social benefits, and minimum negative impacts.
- Minimise visual impacts through retained landscape elements, appropriate design controls, contained construction and site rehabilitation.
- Management of activities to ensure impact on heritage resources, including archaeological resources, is minimised and preservation thereof increased.
- Minimise destruction and contamination of marine environment and disturbance and mortality of species.
- Minimise erosion, sedimentation, dust emission and degradation of water quality by implementing good soil, earthwork, erosion and stockpile management
- Undertake responsible water usage to reduce pressure on local water supply resources and support sustainable water use.
- Minimise runoff of water, storm water, soil, and silt into the marine and surrounding environment to protect water quality and reduce nuisance or safety risks to adjacent users, businesses, and areas.
- Implement waste hierarchy principles to ensure waste generation is reduced; reuse and recycling is promoted; all waste streams receive responsible treatment; safe disposal is assured; and pollution is prevented.
- Preserve the receiving environment, well-being of staff and local communities through appropriate hazardous substance storage, handling, disposal and pollution prevention.
- Prevent and control fires to the extent that public health; safety; property and environmental protection are assured.

- Prevention of pollution of soil, surface water, marine environment and groundwater through properly managed batching plant operations.
- Ensure clean and well-maintained toilet/ sanitation facilities are available to all staff in an effort to minimise the risk of disease and impact on the environment.
- Prevention of environmental risks through proper workshop, equipment maintenance, and storage practices.
- Minimise excessive/ additional road traffic to ensure public health and safety.
- Reinstate impacted areas to an extent that commercial, recreational and environmental protection are assured and no environmental degradation occurs as a result of development.

OPERATIONAL ENVIRONMENTAL MANAGEMENT OUTCOMES

- Maximise positive and minimise negative socio-economic impacts associated with the development by prioritising local employment and procurement, supporting skills development, and promoting opportunities for local businesses and inclusive hiring.
- Minimise visual impacts through appropriate design controls and the implementation of a context-sensitive landscape design.
- Preserve good relations with neighbouring communities to ensure maximum social benefits, and minimum negative impacts.
- Minimise runoff of water, storm water, soil, and silt into the marine and surrounding environment to protect water quality and reduce nuisance or safety risks to adjacent users, businesses, and areas.
- Implement waste hierarchy principles to ensure waste generation is reduced; reuse and recycling is promoted; all waste streams receive responsible treatment; safe disposal is assured; and pollution is prevented.
- Prevent spillages and pollution of hazardous substances to preserve the receiving environment, well-being of staff and local communities through implementing appropriate mitigation measures.
- Prevent and control fires to the extent that public health; safety; property and environmental protection are assured.

2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.

1. All essential mitigation measures and management actions identified in the EMPr must be implemented and adhered to throughout the construction and operational phases.
2. An independent ECO must be appointed prior to the commencement of construction to oversee compliance with the EMPr and the conditions of the Environmental Authorisation. The ECO must conduct and submit environmental audit reports at intervals specified by the Competent Authority.
3. Environmental audits must be undertaken in accordance with Regulation 34 of the EIA Regulations (2014, as amended). These audits must be conducted by an independent auditor or the appointed ECO, as appropriate, and in accordance with the requirements set out in the EMPr.

2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.

Based on the findings of this Basic Assessment and its specialist studies, it is the opinion of the EAP that there are no negative impacts that cannot be satisfactorily mitigated to acceptable levels. The assessed project benefits outweigh the negative impacts, and the project is anticipated to make a positive contribution to socio-economic and heritage outcomes (such as access to the coast).

The site represents one of the few remaining parcels within the precinct suitable for this type of mixed-use development, and which already benefits from existing development rights. At present, it is underutilised and of limited economic or cultural value, being largely used for parking and temporary storage. Its redevelopment will therefore optimise the use of this previously transformed inner-city land within an established urban precinct. Existing service infrastructure will be utilised, meaning no major bulk infrastructure upgrades are required. From a legislative and planning perspective, the development aligns with relevant national, provincial, and local legislation, spatial planning policies, frameworks, and plans, and is further appropriately zoned as Mixed Use 3 (MU3).

From an ecological perspective, no terrestrial or aquatic biodiversity impacts are anticipated, as the site is located within a built-up, highly transformed urban area on reclaimed land (inherently artificial) and therefore does not support natural vegetation, aquatic features, or faunal habitat. Furthermore, the site has very low marine sensitivity, as it is physically separated from the marine environment by existing coastal infrastructure and lacks functional connectivity to marine habitats. As such, no significant impacts on the coastal and marine environment are expected, provided that appropriate mitigation measures are implemented.

From a socio-economic perspective, the proposed development will result in substantial positive socio-economic benefits during both the construction and operational phases. During construction, the development is expected to generate significant temporary economic activity, employment opportunities, household income, and government revenue through direct, indirect, and induced effects. Approximately 5 100 temporary jobs are expected to be supported, while the construction phase is estimated to contribute approximately R4.3 billion in economic output and around R1.7 billion to GDP. During operation, the development is expected to generate sustained positive economic benefits through ongoing tourism, residential, retail, hospitality, and commercial activity. Approximately 369 permanent jobs are expected to be created, together with ongoing household income generation, increased government revenue, and skills development opportunities. The proposed development will also improve public open space, amenity value, and public access through the inclusion of Atlantic Park, enhanced promenade areas, and improved public realm infrastructure. In addition, the development is expected to positively contribute to the visitor economy and strengthen the V&A Waterfront's role as a major tourism and economic node within Cape Town. The only negative socio-economic impacts relate to temporary construction-related impacts associated with noise, dust, traffic, and health and safety risks, which are expected to remain localised, short term, and manageable through standard best practice and health and safety mitigation measures.

From a heritage perspective, the site itself has limited intrinsic heritage significance, as it largely comprises reclaimed and previously disturbed land. However, it remains important in terms of potential archaeological resources, its visual and spatial relationship with surrounding heritage resources, the historic urban and coastal context, the coastal edge, and views towards Table Bay and Robben Island. As such, the heritage assessment was informed largely by the VIA and the AIA.

In terms of archaeological resources, potential impacts on buried maritime archaeological or submerged pre-colonial archaeological resources may occur during construction. However, these can be effectively managed through archaeological monitoring and chance-find procedures. No significant operational impacts on archaeological resources are anticipated.

In terms of visual and townscape impacts, the assessment found that temporary construction-phase visual impacts will be low and localised, and can be mitigated through appropriate construction management measures. During operation, the proposed development is expected to positively enhance the visual character and sense of place of the area through improved public realm design, active waterfront interfaces, landscaping, enhanced promenade access, and improved visual and physical connections to the sea.

Overall, the specialist studies confirm that all potential negative impacts associated with the development can be effectively avoided, managed, or mitigated. As a result, besides impacts on submerged pre-colonial archaeological resources (which has a post-mitigation significance of "Medium" negative), all residual negative impacts associated with the construction phase could be reduced to a significance between "Low" and "Insignificant". Furthermore, despite the "Medium" negative significance rating, the archaeological specialist stated that the development can be considered archaeologically acceptable and can be authorised, provided that the mitigation measures are implemented. Consequently, the specialists unanimously found that the negative impacts associated with the construction phase do not present a barrier to authorisation—which is further exemplified by the fact that no negative operational phase impacts were identified.

More importantly, the potential benefits afforded by the development throughout the construction and operational phase, are predicted to outweigh the negative impacts. Most positive impacts are assessed as at least of "Medium" positive significance both before and after optimisation measures are applied, with one construction phase impact and six operational impacts assessed as being of "High" positive significance should optimisation measures be implemented. These positive impacts relate primarily to socio-economic benefits, including employment generation during both the construction and operational phases, increased tourism activity, investment and revenue generation, improved public spaces and facilities, and enhancement of the visual character of the precinct.

The cumulative impact assessments similarity indicates a positive overall outcome, with the SEIA, VIA and HIA all rating cumulative impacts as positive. These range from "Low" positive for Visual/Landscape and Heritage receptors to "Medium-High" positive for socio-economic receptors, confirming that the development performs well within its broader cumulative context.

Should the development not proceed (No-Go option), both the heritage, visual and socio-economic specialists indicated that continued underutilisation of the site would be undesirable as it would result in a deterioration of its current condition and have negative implications for the broader heritage context, visual and townscape quality, and socio-economic benefits. In this regard, both the HIA and VIA rated the heritage and visual impacts resulting from not proceeding with the development and continued underutilisation of the site as being of "Low" negative significance. The SEIA rated the loss of potential socio-economic benefits as being of "Medium" negative significance due to the notable loss of potential benefits. These findings further highlight the importance of proceeding with the development.

In summary, the proposed development is expected to result in strong long-term net positive socio-economic, public realm, tourism, and urban amenity benefits, as well as improvements to sense of place, visual character, and townscape quality, extending across both the construction and operational phases. These benefits outweigh the limited, short-term, localised construction-related impacts, which can be effectively managed through mitigation. In addition, no operational negative impacts have been identified.

Based on the findings of the specialist studies and the Basic Assessment process, it is the EAP's reasoned opinion that the proposed development is acceptable from an environmental, social, economic, and heritage perspective. No significant adverse impacts are anticipated, while

meaningful net positive benefits are expected to be realised. It is therefore recommended that Environmental Authorisation be granted.

To ensure the effective implementation mitigation and management actions, an EMPr has been compiled. The mitigation measures necessary to ensure that the project is planned, constructed, and operated in an environmental responsible manner are listed in the EMPr. The EMPr is a dynamic document that should be updated from time to time and provide clear and implementable measures for the establishment and operation of the proposed development.

Provided the specified mitigation measures are applied effectively**, it is recommended that the project should receive Environmental Authorisation** in terms of the 2014 EIA Regulations, as amended, subject to the following conditions:

- Implementation of the Environmental Management Programme (EMPr) forming part of this Basic Assessment Report during the design and construction phases of the redevelopment.
- Appointment of an independent Environmental Control Officer for the duration of the construction phase to carry out the responsibilities of that role as defined in the EMPr.

2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.

The BA is based on the best available data, specialist studies, and stakeholder engagement. However, as with all environmental assessments, certain assumptions, uncertainties, and gaps in knowledge exist. This should not influence the impact assessment process and final decision-making.

Project layout and Description

The study is based on details provided by the applicant as they pertain to planned infrastructures design, proposed activities and sites etc.

Baseline Data Accuracy

Existing environmental, social and economic data, specialist reports, and stakeholder inputs provide an accurate representation of the receiving environment and its sensitivities. The accuracy and confidence of this study is dependent on the data available.

Regulatory Compliance

The project will adhere to all regulations and ensure that mitigation measures are effectively implemented.

Stakeholder Engagement

The concerns raised during public participation will accurately reflect the views of Interested and Affected Parties (I&APs), and no major unforeseen objections will arise later in the process.

Climatic Conditions

The predicted climatic conditions, including sea level rise and extreme weather events, will remain within the anticipated range, and no unforeseen climatic anomalies will significantly alter the project's feasibility or impact.

Project Activities

The assessment of the significance of impacts of the Project on the affected environment is based on the assumption that the activities are limited to those described in this report. If any substantial changes are made to the project description, impacts may need to be reassessed.

Long-Term and Cumulative Environmental Impacts

Long-term and cumulative environmental impacts are described qualitatively and are inherently associated with a degree of uncertainty.

Socio-Economic Consideration

- It is assumed that all information provided by the EAP and Client is correct, and that this assessment may be invalidated should significantly contradictory information arise following the assessment's completion.
- The baseline information used to formulate the social and demographic context for this project may be imperfect, out of date, or lack the resolution required to address specific concerns pertaining to this development. Consequently, this has be used to contextually frame this development within the broader socio-economic context of the area (and Cape Town in general) but should not be assumed to perfectly represent the conditions on the ground.
- This assessment only considers information that was available (or was made available) at the time of the conclusion of the assessment. Should additional information subsequently be made available, and a revision of the report be required, such a revision falls outside of the scope of work of this study. Anchor cannot be held liable for inaccuracies in this assessment that are based on information made available after the report's completion.
- There is inevitably a degree of subjectivity and limitation in impact assessment and data interpretation. While this assessment is informed by extensive project experience and a high level of confidence in both the available information and its integration, some uncertainty remains in the resulting findings and the recommendations derived from them.

Heritage Considerations

- As a standard preface, it is accepted that historic records must always be open to question. As examples (and following Hart T), before 1652, there was no formal standard by which place names were derived. Thus caution must be exercised in using early historic spatial records. Restrictions of the written archival record include contemporary selection, modern selection, bias and interpretation. Records written reflect the author's or a section of society's point of view of events (Smith et al. 1991, Hart 1984).
- It is noted that the significance of a heritage resource is dynamic and multi-faceted, as interest groups and societal values change over time. It is thus neither possible, nor appropriate to provide a definitive statement of heritage significance. Nonetheless, every effort has been made to ensure that the heritage statement is as accurate a reflection of significance as is currently possible to ascertain.
- The information and assessments supplied by others (including historical and background information from earlier applications) are assumed to be accurate and a fair representation of the circumstances or proposed development. It is assumed all relevant information has been or will be disclosed.

- This report will not address heritage impacts beyond the site boundaries that may result from the laying of pipelines, electrical and other related infrastructure between the site and elsewhere should it be required.
- Current construction of a basement and development in the vicinity of the site limits clear visualisation. However, all assessors are familiar with the site, have viewed the site prior to construction and this limitation is not therefore considered to derogate from the analysis and assessment.

Archaeology Considerations

- South Africa's record of maritime and underwater cultural heritage resources is based on a mix of information derived in the main from historical documents and secondary sources and from very limited primary sources such as geophysical data and other field-based observations and site recordings.
- While every effort has been made to ensure the accuracy of the information presented below, the reliance on secondary data sources means that there are considerable gaps and inaccuracies in this record and the locations of any wrecks referred to in the following sections and are, for the most part, approximate.
- The potential also exists for currently unknown and/or unrecorded maritime heritage sites to be encountered within the Granger Bay Precinct Phase 1B project area.
- Direct evidence for submerged pre-colonial archaeological sites and materials on the South African continental shelf is extremely limited. However, submerged archaeological sites and materials found in offshore contexts elsewhere in the world and the known terrestrial archaeology of the South African, are indicative of the potential for such submerged sites and materials around our coast.

2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

EA Period: 10 Years
Conclusion of Construction: +5 -10 Years (to be phased)
Post Construction Monitoring: 2 Year

3. WATER

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.

Non-potable water to be used throughout the construction phase.

Once operational, the development will have a requirement of 39m^3 /day of potable water, which will be drawn from the municipal water supply, and supplemented by the V&AW licensed desalination plant as required. This is in alignment with the V&AWs long-term objective to reduce reliance on the City of Cape Town for their water supply. This will be implemented in a phased manner, with the objective of eventually relying on the City's mains connections to the V&AW only for critical situations only. In this regard, the V&AWs Desalination Plant (located outside the application site area on V&AW owned property) has been designed to meet current water demands, and to cater for future growth of the property, including the application site. The desalination plant has a production capacity of 3,300 m^3/d and will be upgradable, with minimal disruption, to 5,000 m^3/d in future.

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 incorporated in the proposed development.

4. WASTE

Explain what measures have been taken to reduce, reuse or recycle waste.
The V&A's solid waste handling centre has existing capacity to manage the proposed waste generated from the proposed developments. Waste Plan provides waste management services to the V&A Waterfront. The existing V&A Waterfront Solid Waste Facility has sufficient capacity to accommodate the projected solid waste generated by the Breakwater and Granger Bay precincts.

5. ENERGY EFFICIENCY

8.1.	Explain what design measures have been taken to ensure that the development proposal will be energy efficient.

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 incorporated in the proposed development.

SECTION K: DECLARATIONS

1. DECLARATION OF THE APPLICANT

Note: Duplicate this section where there is more than one Applicant.

I **Neil Schwartz** , ID number **5805265097086** in my personal capacity or duly authorised thereto 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 "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 EA;
- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;
- I will provide the EAP and any specialist, where applicable, and the CA 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 legitimately 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 CA, hereby indemnify, the government of the Republic, the CA 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.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.

Signature of the Applicant: Date: 19 AUGUST 2026

V&A Waterfront Holdings Pty Ltd.

Name of company (if applicable):

2. DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I … **CHERUSCHA SWART** ……, EAP Registration number **2021/3298** as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- 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
  - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- 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 CA and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the CA 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 CA 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;

18 August 2026

Signature of the EAP: Date:

Anchor Environmental Consultants (Pty) Ltd

Name of company (if applicable):

3. DECLARATION OF THE REVIEW EAP

~~I ……, EAP Registration number …….. as the appointed Review EAP hereby declare/affirm that:~~

- ~~I have reviewed all the work produced by the EAP;~~
- ~~I have reviewed the correctness of the information provided as part of this Report;~~
- ~~I meet all of the general requirements of EAPs as set out in Regulation 13 of the NEMA EIA Regulations;~~
- ~~I have disclosed to the applicant, the EAP, the specialist (if any), the review specialist (if any), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; 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:~~

Name of company (if applicable):

4. DECLARATION OF THE SPECIALIST

THESE HAVE BEEN INCLUDED WITHIN THE RESPECTIVE SPECIALIST STUDIES

Note: Duplicate this section where there is more than one specialist.

I ……, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, 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 development proposal or application and that there are no circumstances that may compromise my objectivity; or

  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);

- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;

- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and

- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Signature of the Specialist: Date:

Name of company (if applicable):

~~5. DECLARATION OF THE REVIEW SPECIALIST~~

~~I ……, as the appointed Review Specialist hereby declare/affirm that:~~

- ~~I have reviewed all the work produced by the Specialist(s):~~
- ~~I have reviewed the correctness of the specialist information provided as part of this Report;~~
- ~~I meet all of the general requirements of specialists as set out in Regulation 13 of the NEMA EIA Regulations;~~
- ~~I have disclosed to the applicant, the EAP, the review EAP (if applicable), the Specialist(s), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; 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:~~

~~Name of company (if applicable):~~

ANCHOR environmental | PART OF SLR