

APPENDIX E20 – SPECIALISTS’ TERMS OF REFERENCE

Pre-Application Draft Basic Assessment Report

**Basic Assessment for 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**

2026

Anchor Environmental Consultants (Pty) Ltd
8 Steenberg House, Silverwood Close, Tokai, South Africa
www.anchorenvironmental.co.za



© Anchor Environmental Consultants 2026

Use of material contained in this document by prior written permission of Anchor Environmental Consultants only.



Anchor Environmental Consultants
8 Steenberg House
Silverwood Close
Tokai 7945, South Africa
Tel +27 21 7013420; Fax +21 21 7015280
www.anchorenvironmental.co.za
cher@anchorenvironmental.co.za

27 March 2026

Claire Abrahamse
Claire Abrahamse Architecture, Urban Design, Heritage
2nd Floor, Wale Street Chambers
38 Wale Street
Cape Town
8001
claire@claireabrahamse.co.za

Attention: Claire Abrahamse

RE: BASIC ASSESSMENT PROCESS FOR THE 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

VISUAL SPECIALIST STUDY TERMS OF REFERENCE

Anchor Environmental Consultants (Pty) Ltd has been appointed by the Victoria & Alfred Waterfront (V&AW; the Applicant/ Client) in Cape Town to undertake a Basic Assessment (BA) process to obtain Environmental Authorisation (EA) for a proposed mixed-use development located on the northeast edge of the V&A Waterfront (see Figure 1). The proposed development is described in detail in Section 1. This application is being conducted in accordance with the National Environmental Management Act, 1998 (Act No. 107 of 1998; NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended). As part of the BA process, various specialist studies are required, including a Heritage Impact Assessment (HIA) and a Visual Impact Assessment (VIA).

Additionally, a Section 38(1) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999; NHRA) Record of Decision (RoD), issued by Heritage Western Cape (HWC) on 28 October 2024 for a previous project by the V&A Waterfront, stipulates that the proposed development on the identified parcels (O, P, a1, and a2) must be subject to further heritage assessment requirements in terms of Section 38 of the NHRA. Specifically, it requires the submission of a Notification of Intent to Develop (NID) and a comprehensive HIA with a more detailed analysis of the site, its significance, and site-specific heritage indicators. Given the existing Memorandum of Understanding (MoU) between HWC and the Department of Environmental Affairs and Development Planning (DEA&DP) on the integrated handling of HIAs within NEMA applications, this HIA will serve both the NEMA and NHRA processes and will be undertaken as a single, integrated process during the BA by Cindy Postlethwayt.

As you undertook the visual and townscape studies for the initial HIA, you have been appointed to expand upon this groundwork in undertaking the anticipated Townscape and Visual Impact Studies for the development of the above parcels as part of the HIA. As the development also triggers a NEMA process, you will also be providing the VIA as part of NEMA BA process.

The scope of work for the required specialist study, in support of both the BA process and the heritage requirements under Section 38 of the NHRA, is outlined in the Terms of Reference (ToR) included in this letter. The ToR are intended to guide the focus of the specialist study, rather than prescribe it in detail. In addition, not all aspects of the ToR will be applicable to every specialist. The ToR are therefore provided as a broad framework and specialists are encouraged to apply their professional judgement and experience in refining and expanding the scope where necessary and as relevant to their specific discipline, in consultation with Anchor.

Please note that your appointment will be made directly by Anchor. Any queries relating to the project scope, programme, or budget can therefore be directed to Cheruscha Swart at Anchor.

Should a site visit be required, Anchor must be notified at least two weeks in advance to allow for appropriate arrangements to be made.

Kind regards,

A handwritten signature in black ink, appearing to read 'Cheruscha Swart', with a stylized flourish extending to the right.

Cheruscha Swart

Environmental Assessment Practitioner and Senior Consultant
Anchor Environmental Consultants (Pty) Ltd

I. PROJECT DESCRIPTION

I.1 BACKGROUND

The 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 is now proposing a mixed-use development within its Breakwater Precinct, on Erven 158570 RE, 149294 RE, 177854 and 179076, situated adjacent to the Port of Cape Town and V&AW Harbour and north of the Table Bay Hotel (Figure 1). The site is currently used as an overflow parking area and container storage site.

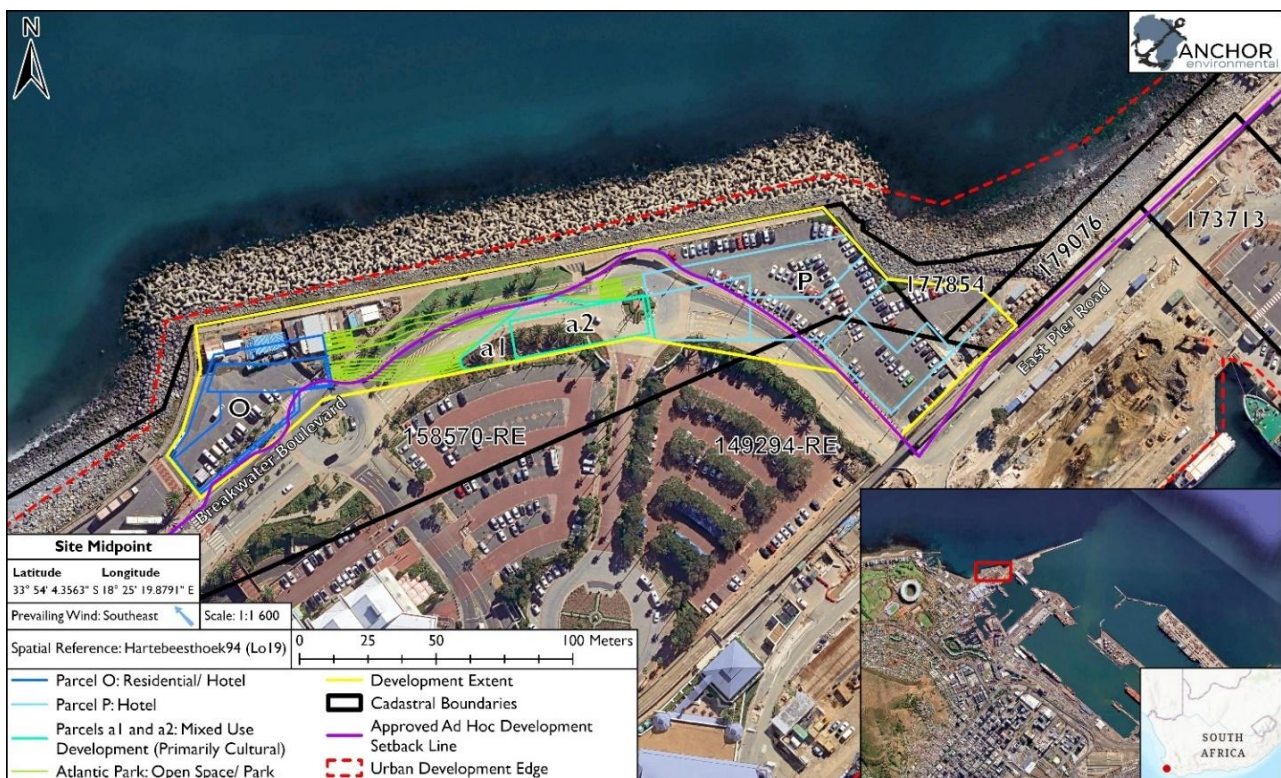


Figure 1. Location of the proposed mixed-use development on Erven 158570 RE, 149294 RE, 177854 and 179076 within the V&A Waterfront, Cape Town. The original layout and land use of the site are also visible, including existing infrastructure such as roads, parking areas, landscaped lawns with palm trees,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

The project involves the redevelopment of the site (portions of Erven 158570 RE, 149294 RE, 177854 and 179076) into a mixed-use precinct with a total development footprint of approximately 12 700 m² (1,27ha). 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 2). The proposal also includes all associated infrastructure and structures located between these components. The development will have a maximum building height of 32 m above Existing Ground Level for Parcel O. Key building dimensions and footprints are summarised in Table 1 and Table 2.

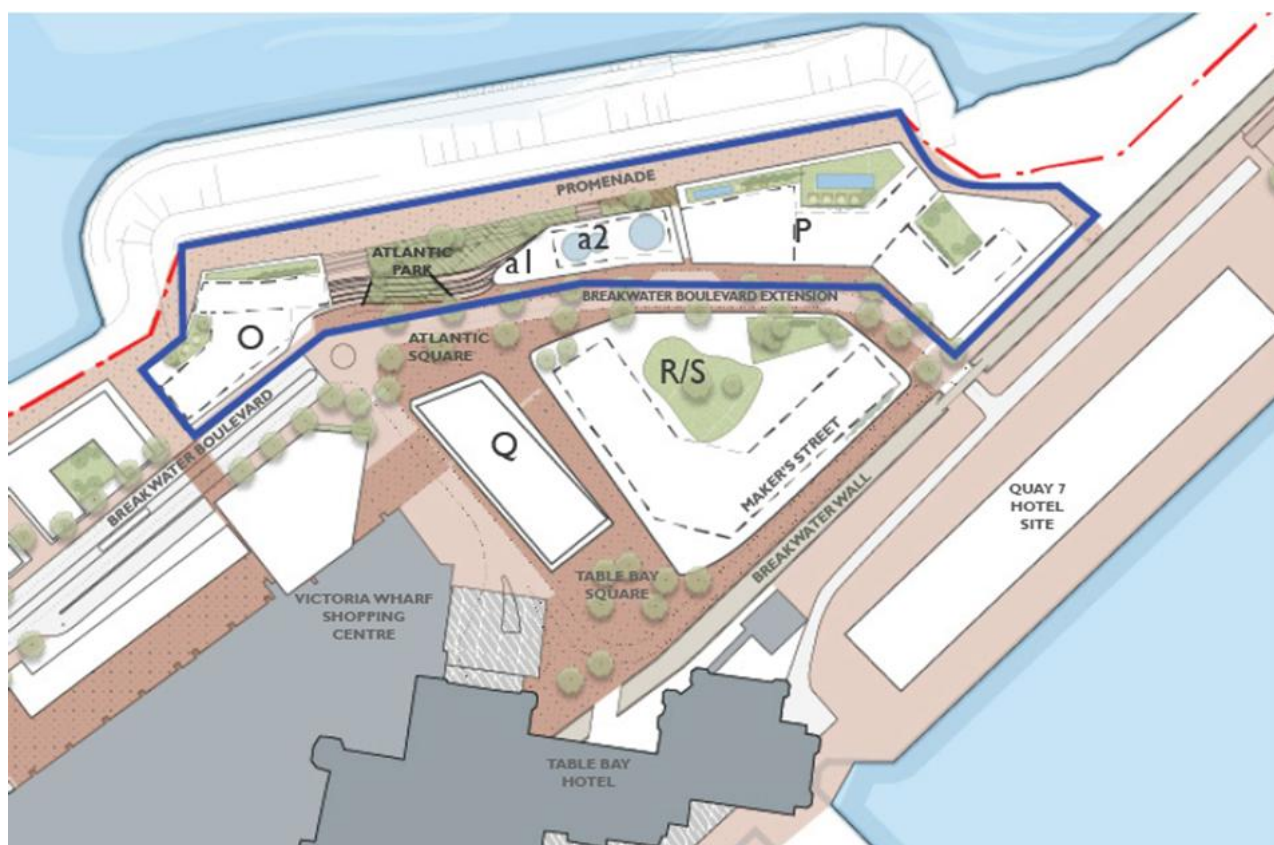


Figure 2. Proposed development layout and design for this project. This phase includes Block P, O and a1 & a2, Atlantic Park and the Promenade.

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)	Bulk/Block (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 to be utilised
158570 RE	29 338 m ²	892 m ²
149294 RE	854 442 m ²	10 000 m ²
177854	1 095 m ²	419 m ²
179076	4125 m ²	89 m ²

Parcel O: Residential/Hotel

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: 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 a specialist and educational facilities associated with the rehabilitation of turtles. 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 Square. 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, to allow for improved views of the water.

1.2 ZONING

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

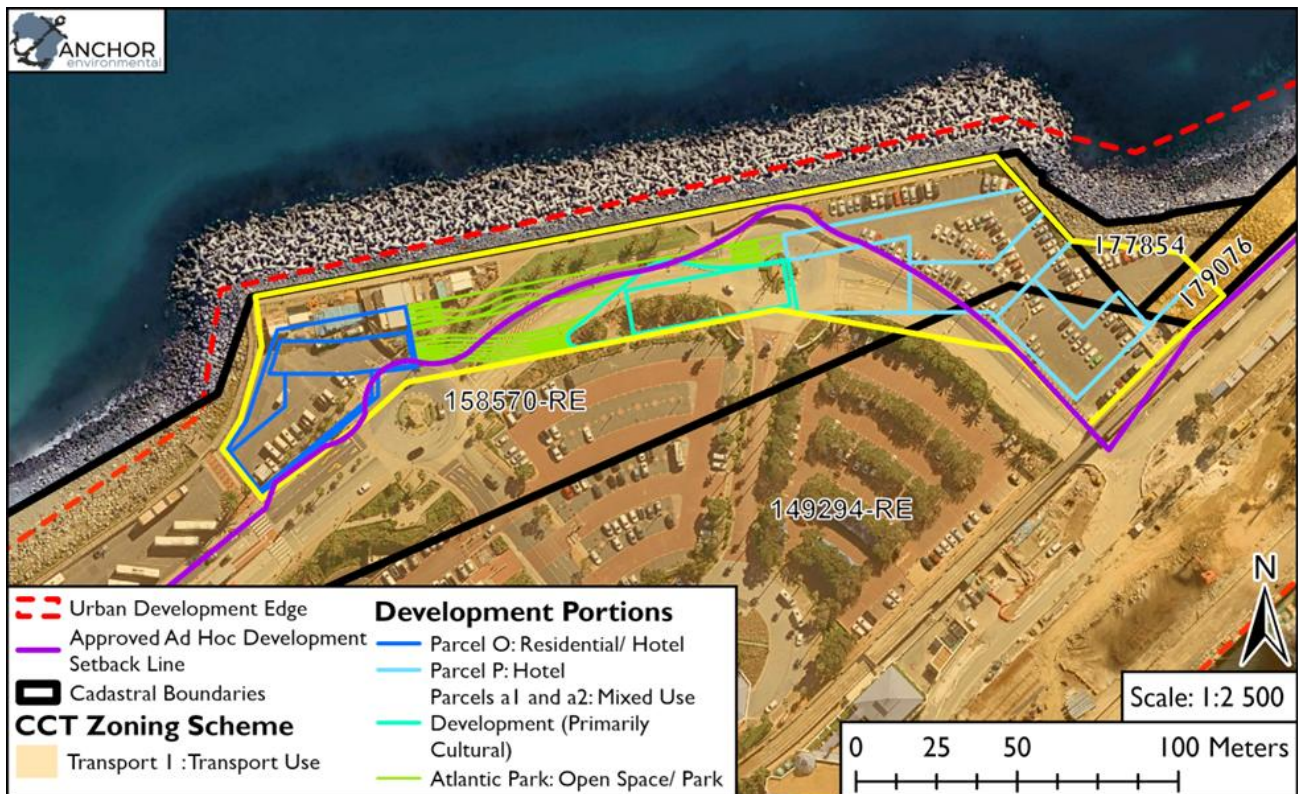


Figure 3. Land zoning for the proposed development.

1.3 SERVICES

General Pipeline Infrastructure

The proposed development will utilise existing approved bulk development rights, and therefore the CoCT is obliged to meet the service infrastructure demands of the proposed development. Existing pipeline infrastructure is located within the Breakwater Street, adjacent to the proposed site. A Capacity Letter will be submitted as an appendix with the Final Basic Assessment Report (BAR).

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 m³/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 require 39m³ /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 CoCT 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 will have an initial production capacity of produce 3,300 m³/d and will be upgradable, with minimal disruption, to 5,000 m³/d in future.

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 (a letter of confirmation will be submitted as an appendix to the BAR). The Municipal supply will be augmented with renewable energy (wind and solar). However, the approvals for these installations will only be applied for as individual buildings are required.

1.4 ALTERNATIVES

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.

Alternative building designs have, however, been explored. Details of these can be provided to the specialist for consideration and assessment, should this be required.

1.5 ENVIRONMENTAL AUTHORISATION PROCESS

In terms of the EIA Regulations, certain activities, known as Listed Activities and published in Listing Notices (LN) 1, 2 and 3, may result in environmental, socio-economic or cultural heritage impacts and therefore require assessment and EA from the competent authority, in this case the DEA&DP, prior to commencement. Activities listed under LN 1 and LN 3 typically relate to smaller-scale developments and require assessment through a BA process. As the proposed development triggers activities under LN 1, EA must be obtained through a BA process. The BA process entails the assessment of potential environmental impacts associated with the proposed development. This includes desktop studies, the appointment of relevant specialists to undertake specialist assessments, and the compilation of findings into a BAR. The BAR is made available to interested and affected parties for review and comment as part of the public participation process. All comments received are compiled into a Comments and Response Report (CRR) and are considered in the updating of the BAR, where applicable, prior to submission of the final BAR and CRR to DEA&DP for decision-making on the EA application.

Anchor has therefore been appointed as the Environmental Assessment Practitioner (EAP) to coordinate the required specialist studies and to manage and facilitate the BA process.

2. SCREENING TOOL & SITE SENSITIVITY VERIFICATION (SSV) OUTCOME

The Screening Tool identified the need for a Landscape / Visual Impact Assessment. This is likely due to a combination of the selected development's selected Application Category and the site's location within a highly urbanised area of Cape Town, which also holds significant heritage, cultural, social, and economic value, is located near key landmarks, and lies within a coastal setting. The recommendation is therefore considered accurate, and the EAP agrees that a Visual Impact Assessment is warranted.

The RoD issued by HWC further confirms the requirement for visual and townscape assessments as part of the HIA. Given the context of the site, a visual and townscape assessment is considered more appropriate than a landscape assessment. The EAP therefore requires that an integrated visual and townscape assessment be undertaken to inform both the HIA in terms of the NHRA and the BA process under NEMA.

3. OVERVIEW OF THE TERMS OF REFERENCE AND REQUIREMENTS FOR SPECIALIST STUDIES

- The appointed Consultant is required to undertake the specialist investigation and compile a report in accordance with the Scope of Work (SoW) and ToR provided in this document.
- The specialist report must be prepared in line with applicable legal, policy, and procedural requirements, particularly in relation to assessment methodologies and reporting standards. This includes, but is not limited to:
 - NEMA; Act 107 of 1998, ensuring alignment with the EIA Regulations and that the report is suitable as a standalone specialist report within the EIA process;
 - NHRA; Act No. 25 of 1999, where relevant, including compliance with Sections 38;
 - The requirements for specialist reports as set out in Appendix 6 of the EIA Regulations (General Gazetted Requirements);
 - DEA&DP guideline for involving visual and aesthetic specialists in EIA processes (2005), where applicable;
 - DEAT (2006) Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006. Integrated Environmental Management Guideline Series, Department of Environmental Affairs and Tourism (DEAT), Pretoria.
 - Any other applicable legislation, regulations, or guidance documents.

Minimum Requirements for the Specialist Study and Report:

The specialist study must address the following:

- Describe the current environmental baseline relevant to the specialist field;
- Identify and evaluate potential impacts (both positive and negative) associated with the proposed development, applying the prescribed impact assessment methodology (refer to the end of the document);
- Propose appropriate mitigation measures / actions to manage negative impacts and, where possible, enhance positive outcomes;
- Recommend monitoring requirements, where relevant, to verify the implementation and effectiveness of mitigation measures;
- Assess the environmental acceptability of any considered alternatives and identify a preferred alternative, where applicable;
- Provide a substantiated professional opinion on the acceptability of the proposed development within the context of the specialist discipline;
- Highlight any conditions that should be attached to potential authorisation;
- Clearly state any assumptions, limitations, and uncertainties associated with the assessment;
- Identify any additional work or investigations that may be required;
- Respond to issues relevant to the specialist discipline that arise during the public participation process; and
- Present the above in a structured specialist report that complies with the relevant regulatory requirements.

4. DETAILED SPECIALIST STUDY TERMS OF REFERENCE AND REPORT CONTENT

Specialists are required to consider the following requirements during the preparation and compilation of the specialist report:

- The specialist report is intended for use by stakeholders, members of the public and authorities. It must therefore be written in a clear and accessible manner, with technical terminology minimised where possible. Where technical terms are necessary, these must be explained in a dedicated glossary.
- All figures, maps, and spatial outputs must be of high resolution and suitable for inclusion in the Basic Assessment Report, where required.
- The report must align with and be informed by the requirements outlined in Section 3.
- As a minimum, the specialist study and report must include the following components:

1.6 EXECUTIVE SUMMARY

The Executive Summary should briefly outline the purpose and context of the assessment and provide a short description of the proposed development. It must present an accurate, clear, and comprehensive summary of the baseline environment, impact assessment (including a summary table of identified impacts) and mitigation measures, as well as clearly set out the key findings, conclusions, and recommendations of the study. The summary must be written in a manner that is readily understandable to non-specialists and must avoid detailed technical discussion and jargon.

The Executive Summary is likely to serve as a primary source of information for inclusion in the BAR and should therefore provide a clear, accurate, and comprehensive summary of the content of the report.

1.7 DECLARATION BY SPECIALIST

The report must include a signed declaration by the specialist in the format required by the Competent Authority. This template will be provided by the EAP. Depending on the requirements of the Competent Authority, the declaration may need to be signed in the presence of a Commissioner of Oaths.

1.8 SPECIALIST EXPERTISE

This section must provide a summary of the specialist's qualifications, professional registrations, relevant experience, and area of expertise as it relates to the study. A full Curriculum Vitae must be included in the appendices, along with copies of relevant qualifications and professional registration certificates (certified if required).

1.9 ACRONYMS/ ABBREVIATIONS

A list of all acronyms and abbreviations used throughout the report must be provided to ensure clarity and ease of reference.

1.10 GLOSSARY (IF APPLICABLE)

Where technical terminology is used, a glossary must be included defining key terms used within the specialist report

1.11 INTRODUCTION

The introduction must provide the background to the project and clearly explain the purpose and scope of the specialist study. It should briefly describe the proposed development, including its key components. The study area must also be described, with clear indication of the spatial extent relevant to the assessment. The section must be supported by appropriate maps clearly illustrating the study area.

1.12 LEGISLATIVE REVIEW

This section must identify and briefly describe all legislation, policies, guidelines, and regulatory requirements relevant to the specialist discipline and the proposed development. It must further explain how the development responds to and complies with these requirements.

1.13 ASSUMPTIONS AND LIMITATIONS

All assumptions, limitations, data gaps, and uncertainties associated with the assessment must be clearly stated. This includes any constraints that may have influenced the scope, accuracy, or interpretation of the findings.

1.14 METHODOLOGY/ APPROACH TO THE STUDY

This section must describe the overall approach adopted for the study, including the methods used to collect, analyse, and interpret baseline data. Information sources must be identified, and the appropriateness of the methodologies applied must be briefly justified. Where relevant, the knowledge of local communities or stakeholders should be incorporated. The assessment should primarily be based on accepted scientific methods; however, where data is limited, professional judgement and experience must be applied and clearly stated. The ToR for the specialist study must also be included in this section or referenced appropriately.

1.15 DESCRIPTION OF THE AFFECTED ENVIRONMENT (BASELINE DESCRIPTION)

The specialist must provide a comprehensive description of the existing conditions within the study area, relevant to their field of expertise (i.e., environmental, social, economic, etc.). This must include both site-specific conditions and the broader surrounding environment to ensure appropriate contextual understanding.

The baseline description must incorporate data obtained through desktop review and field surveys, where applicable. The adequacy of any existing baseline information must be assessed, and updated where necessary if it materially affects the outcomes of the study.

The uniqueness and irreplaceability of the site must be considered within a broader local, regional, and where relevant, national context. This should be informed by comparison with available datasets and existing scientific information.

The specialist must also provide an assessment of environmental sensitivity. In this context, sensitivity refers to the capacity of the environment to absorb or withstand disturbance, taking cumulative impacts into account. Environments with low resilience, where small disturbances may result in significant or irreversible change, should be identified as highly sensitive. Conversely, environments that can accommodate higher levels of disturbance without significant degradation may be considered less sensitive.

1.16 IMPACT IDENTIFICATION AND ASSESSMENT

1.16.1 DETERMINATION OF IMPACTS

1. Direct impacts

Potential impacts (both positive and negative) associated with the proposed development should be identified, described, and assessed in terms of their significance, using the methodology outlined below. The impact should be re-assessed after assuming that effective mitigation measures have been implemented.

Impacts should also be classified as either direct or indirect:

- **Direct impacts** refer to the immediate impacts associated with the development and its activities. These relate to the physical footprint of the project and direct interactions with the receiving environment.
- **Indirect impacts** refer to secondary or induced impacts that occur as a consequence of the development and are typically removed in time or space from the initial activity. These impacts are not caused directly by the project itself, but rather through an intervening process or chain of events. For example, the establishment of new access roads for a development may lead to increased informal settlement or resource harvesting in previously undisturbed areas, resulting in additional environmental degradation. These could be described qualitatively if necessary.

2. Assessment of Alternatives

Impacts associated with any identified alternatives considered as part of the EIA process must also be assessed using the methodology outlined below.

4. Cumulative impacts

Potential cumulative impacts (both positive and negative) associated with the proposed development (preferred alternative only) should be identified, described, and assessed. This assessment should recognise that cumulative impacts occur when:

- Multiple impacts from a single activity, or from different activities, affect the natural or social environment with such frequency over time or intensity in space that the environment is unable to absorb or recover from them; or
- Impacts from one activity interact with those of the same or other activities in a combined or synergistic manner, resulting in greater overall effects than when considered individually.
- They consider the additional contribution of the proposed development to the combined impacts of past, present, and reasonably foreseeable future activities.

The cumulative impact assessment will generally be qualitative and descriptive in nature. Where appropriate, the methodology outlined below can be applied.

Project Phases for the Impact Assessment

For the above assessments, impacts should be divided into the following phases:

- **Construction phase**, referring to impacts arising from the construction of the development and all associated infrastructure;

- **Operational phase**, referring to impacts occurring during the post-construction operation of the development; and
- **Decommissioning phase** (if applicable), referring to impacts associated with the cessation of operations, dismantling of infrastructure, and rehabilitation of the site.

‘No-Go’ / Do Nothing alternative

Impacts (both positive and negative) of the ‘No-Go’ or Do-Nothing alternative must also be identified, described, and assessed using the methodology outlined below.

1.16.2 CONSTRAINTS AND NO-GO AREAS

The impact assessment must also identify any constraints that may critically affect the development’s feasibility. This includes highlighting any fatal flaws, defined as significant adverse impacts that cannot be effectively mitigated and that would render the project or specific components thereof unacceptable within a particular area. Any areas that should be avoided (no-go areas) must be clearly identified and justified. Where a fatal flaw is identified, this must be explicitly stated, together with a clear explanation of the implications for the project.

1.16.3 MITIGATION/ OPTIMISATION MEASURES AND IMPACT MANAGEMENT ACTIONS AND OUTCOMES

Mitigation measures refer to practical actions designed to reduce negative impacts, while optimisation measures are intended to enhance positive impacts/ beneficial outcomes. Specialists must identify and describe practical mitigation and optimisation measures that can be implemented to reduce the significance of negative impacts and/or enhance positive impacts effectively.

Where applicable, specialists must also recommend suitable monitoring and review measures or programmes to ensure the proper implementation of mitigation measures and to assess their ongoing effectiveness.

The mitigation measures recommended by specialists form the foundation for management actions in the Environmental Management Programme (EMPr). An EMPr is required for any project subjected to an EIA and serves as a proactive management tool to guide consistent and ongoing environmental management throughout the life cycle of a development. Its purpose is to prevent or minimise negative impacts while enhancing positive benefits.

The EMPr, however, adopts an outcome-based approach, setting out management actions designed to achieve defined environmental outcomes. In general, mitigation measures represent the ‘what’, the specific recommendations to avoid, reduce, or manage potential environmental impacts, while the actions in the EMPr describe the ‘how’, the specific steps, procedures, and responsibilities required to implement and monitor those measures.

To ensure that mitigation measures are effectively translated into EMPr actions, specialists should develop mitigation measures with an outcome-based approach in mind. These actions or measures should therefore not only reduce the significance of impacts, but also contribute to achieving a clearly defined desired outcome. The outcome/s should be clearly indicated for each impact (see Step 6 in the Impact Assessment Methodology).

In many cases, a single overarching impact management outcome may apply to multiple impacts and may in some instances be applicable across all impacts assessed within a specialist report.

While impacts are assessed for the construction, operational, and decommissioning phases, in some instances impact management outcomes and actions (mitigation measures) may also be identified for the pre-construction or design phase.

Mitigation and optimisation measures must be classified as either:

- **Essential:** These are mandatory for implementation and are non-negotiable. These measures are assumed to be implemented in the “with mitigation” impact scenario and are therefore incorporated into the final assessment of impact significance.
- **Best Practice / Recommended:** These are optional but should be considered for implementation where feasible. These are considered desirable enhancements. However, their non-implementation will not alter the impact rating. In such cases, the applicant must provide a clear and defensible justification for not adopting these measures.

Refer to Step 6 in the Impact Assessment Methodology.

1.17 ENVIRONMENTAL ACCEPTABILITY AND COMPARISON OF ALTERNATIVES

The specialist must evaluate the environmental acceptability of each identified alternative by considering whether the associated impacts are acceptable within the context of the receiving environment. Based on this assessment, the specialist must identify the environmentally preferred alternative and provide a clear, reasoned motivation for this selection, taking into account the comparative significance of impacts and the effectiveness of proposed mitigation measures.

1.18 CONCLUSIONS AND RECOMMENDATIONS

This section must provide a concise synthesis of the key findings of the specialist study, including a summary of the identified impacts and any significant issues of concern. It must indicate the environmental suitability or unsuitability of the assessed alternatives and confirm the preferred alternative, where applicable.

A clear, reasoned opinion must be provided on whether the proposed development should be authorised from the perspective of the specialist discipline. This must be supported by the key mitigation measures required to achieve acceptability, and any recommended conditions of approval must be clearly specified.

The section must also outline any recommended further work, where justified, and indicate an appropriate way forward. Recommendations for additional studies must be well substantiated and limited to those that are necessary.

1.19 REFERENCES

All information sources consulted during the study must be properly cited and listed in this section. While no specific referencing format is prescribed, a consistent and recognised referencing style should be applied throughout.

5. REPORT SUBMISSION AND REVIEW

Draft Specialist Reports, incorporating all required components outlined above, must be submitted electronically to Anchor for review by Anchor and the Client. Draft reports must be provided in Word format to enable review and commenting using track changes. Specialists are encouraged to submit complete and well-developed draft reports to minimise the need for multiple review iterations. Thereafter, specialists must revise their reports accordingly.

The revised Draft Specialist Report will be made available as part of the EIA public participation process. Following this, further updates may be required to address comments received and to finalise the report (see Section 6 below). The Final Specialist Report must incorporate all relevant and valid comments received during the review and public participation processes. Final reports must be submitted to Anchor in both Word and PDF formats.

Anchor will integrate the findings of the specialist studies into the BAR. In doing so, Anchor reserves the right to copy text directly from the specialist reports (verbatim) or to paraphrase content as required.

The Executive Summary is likely to serve as a primary source of information for inclusion in the BAR and should therefore provide a clear, accurate, and comprehensive summary of the baseline environment, impact assessment and mitigation, as well as the key findings and recommendations.

6. RESPONSES TO COMMENTS DURING THE PUBLIC PARTICIPATION PROCESS AND UPDATE OF REPORT

The specialist may be required to assist in responding to comments that are relevant to their field of expertise received during the public participation process. Adequate provision should therefore be made in the proposal for reviewing and responding to such comments.

Where necessary, the specialist will be required to revise and update the Draft Specialist Report to address relevant and substantive comments arising from the public participation process.

7. ADDITIONAL SPECIALIST STUDIES

A number of additional specialist studies are being undertaken as part of the overall assessment process. Information on these studies is provided in Table 3 below. Should engagement between specialists be required to ensure alignment of assumptions, consistency of information, and integration of findings across disciplines, Anchor must be informed. Anchor will then confirm with the relevant specialist and provide the necessary contact details to facilitate engagement. Alternatively, liaison may be coordinated through the Environmental Assessment Practitioner (EAP), Ms Cheruscha Swart. All communication with project engineers and planners must be undertaken through the EAP, Ms Cheruscha Swart.

Table 3. Additional specialist studies and specialist contact information.

Study	Specialist	Organisation
Heritage Impact Assessment	Ms Cindy Postlethwayt	Cindy Postlethwayt Heritage
Visual and Townscape Impact Assessment	Ms Claire Abrahamse	Claire Abrahamse Architecture, Urban Design, Heritage
Socio-Economic Impact Assessment	Ms Gwyn Letley	Anchor Environmental Consultants
Marine Compliance Statement	Ms Amy Wright	Anchor Environmental Consultants

8. TIMING

This should be updated as per the project schedule

Appointment	Date
Draft Impact Assessment Report completed	2 April 2026
Anchor/ client Review completed	14 April 2026
Updated draft Report completed	21 April 2026
Public Participation Process	TBC
Updated/ Final Specialist Report completed	TBC
Specialist issues Final Impact Assessment Report	TBC

It is crucial that the deadlines for submission of specialist studies are met.

9. INVOICING AND PROJECT MANAGEMENT

Invoices must be submitted via email to Cheruscha Swart (cher@anchorenvironmental.co.za), and addressed to Anchor Environmental Consultants (Pty) Ltd (admin@anchorenvironmental.co.za).



Anchor Environmental Consultants
8 Steenberg House
Silverwood Close
Tokai 7945, South Africa
Tel +27 21 7013420; Fax +21 21 7015280
www.anchorenvironmental.co.za
cher@anchorenvironmental.co.za

27 March 2026

Cindy Postlethwayt
7 Ritchie Ave
Kenilworth
Cape Town
7708
cindy@cpheritage.co.za

Attention: Claire Abrahamse

RE: BASIC ASSESSMENT PROCESS FOR THE 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

HERITAGE SPECIALIST IMPACT ASSESSMENT TERMS OF REFERENCE

Anchor Environmental Consultants (Pty) Ltd has been appointed by the Victoria & Alfred Waterfront (V&AW; the Applicant/ Client) in Cape Town to undertake a Basic Assessment (BA) process to obtain Environmental Authorisation (EA) for a proposed mixed-use development located on the northeast edge of the V&A Waterfront (see Figure 1). The proposed development is described in detail in Section 1. This application is being conducted in accordance with the National Environmental Management Act, 1998 (Act No. 107 of 1998; (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended). As part of the BA process, various specialist studies are required, including archaeological, cultural heritage, and palaeontological assessments. These will collectively be addressed through a Heritage Impact Assessment (HIA).

Additionally, a Section 38(1) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999; NHRA) Record of Decision (RoD), issued by Heritage Western Cape (HWC) on 28 October 2024 for a previous project by the V&A Waterfront, stipulates that the proposed development on the identified parcels (O, P, a1, and a2) must be subject to further heritage assessment requirements in terms of Section 38 of the NHRA. Specifically, it requires the submission of a Notification of Intent to Develop (NID) and a comprehensive HIA with a more detailed analysis of the site, its significance, and site-specific heritage indicators. Given the existing Memorandum of Understanding (MoU) between HWC and the Department of Environmental Affairs and Development Planning (DEA&DP) on the integrated handling of HIAs within NEMA applications, this HIA will serve both the NEMA and NHRA processes and will be undertaken as a single, integrated process during the BA. You have therefore been appointed to undertake the relevant HIA in support of both the BA process (in terms of the EIA Regulations) and the heritage requirements under Section 38 of the NHRA.

The scope of work for the required specialist study, in support of both the BA process and the heritage requirements under Section 38 of the NHRA, is outlined in the Terms of Reference (ToR) included in this letter. The ToR are intended to guide the focus of the specialist study, rather than prescribe it in detail.

In addition, not all aspects of the ToR will be applicable to every specialist. The ToR are therefore provided as a broad framework and specialists are encouraged to apply their professional judgement and experience in refining and expanding the scope where necessary and as relevant to their specific discipline, in consultation with Anchor.

Please note that your appointment will be made directly by Anchor. Any queries relating to the project scope, programme, or budget can therefore be directed to Cheruscha Swart at Anchor.

Should a site visit be required, Anchor must be notified at least two weeks in advance to allow for appropriate arrangements to be made.

Kind regards,

A handwritten signature in black ink, appearing to read 'Cheruscha Swart', with a stylized flourish extending to the right.

Cheruscha Swart

Environmental Assessment Practitioner and Senior Consultant
Anchor Environmental Consultants (Pty) Ltd

I. PROJECT DESCRIPTION

I.1 BACKGROUND

The 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 is now proposing a mixed-use development within its Breakwater Precinct, on Erven 158570 RE, 149294 RE, 177854 and 179076, situated adjacent to the Port of Cape Town and V&AW Harbour and north of the Table Bay Hotel (Figure 1). The site is currently used as an overflow parking area and container storage site.

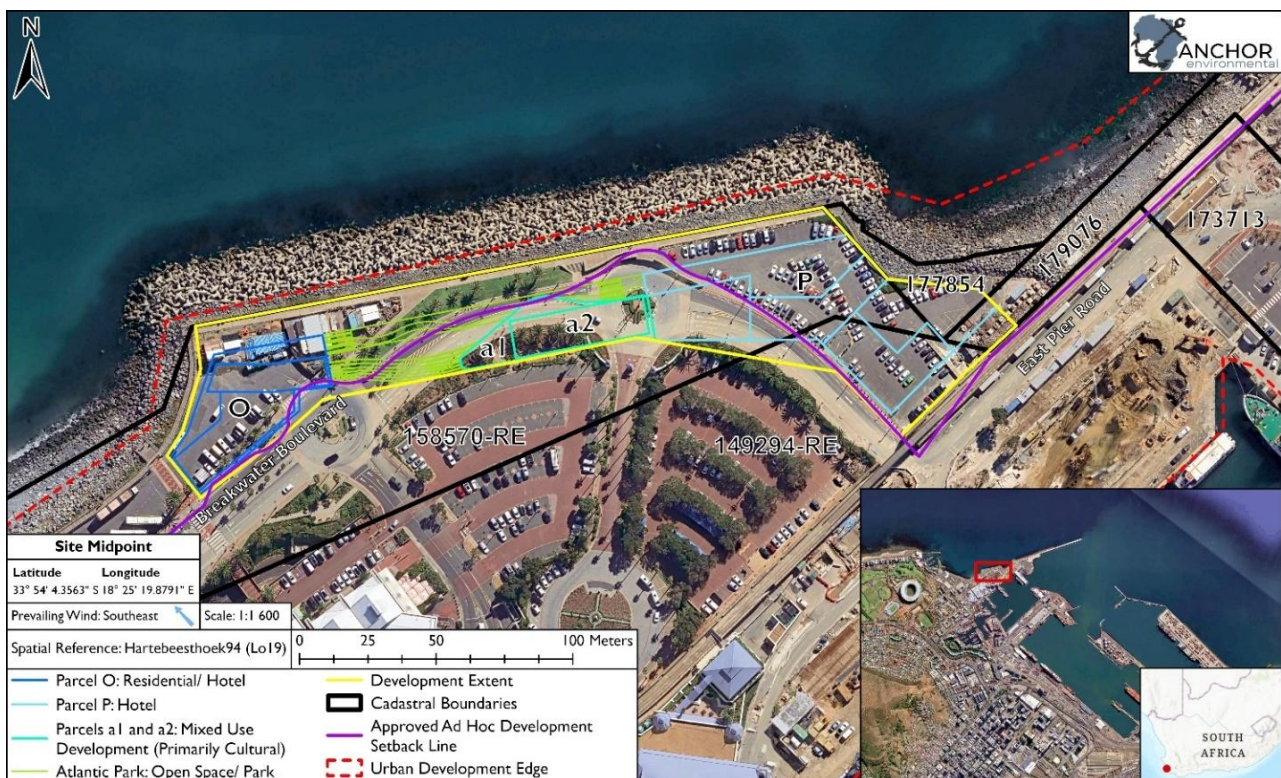


Figure 1. Location of the proposed mixed-use development on Erven 158570 RE, 149294 RE, 177854 and 179076 within the V&A Waterfront, Cape Town. The original layout and land use of the site are also visible, including existing infrastructure such as roads, parking areas, landscaped lawns with palm trees,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

The project involves the redevelopment of the site (portions of Erven 158570 RE, 149294 RE, 177854 and 179076) into a mixed-use precinct with a total development footprint of approximately 12 700 m² (1,27ha). 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 2). The proposal also includes all associated infrastructure and structures located between these components. The development will have a maximum building height of 32 m above Existing Ground Level for Parcel O. Key building dimensions and footprints are summarised in Table 1 and

Building Block	Max from Ground Level	Height Existing	Building Footprint (m2)	Gross Area /Block (m2)	Building (Gba) GLA (m2)	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.

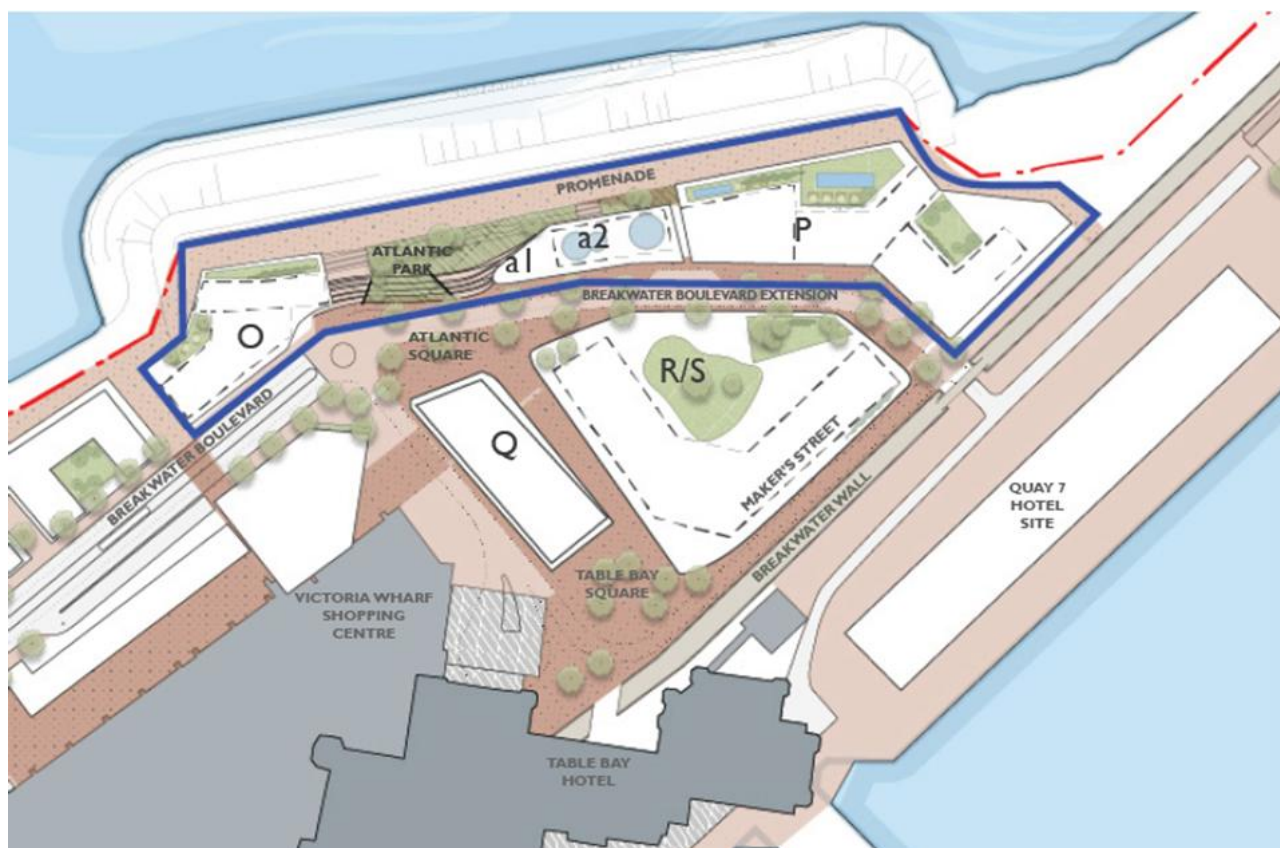


Figure 2. Proposed development layout and design for this project. This phase includes Block P, O and a1 & a2, Atlantic Park and the Promenade.

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

Building Block	Max from Ground Level	Height Existing	Building Footprint (m2)	Gross Area /Block (m2)	Building (Gba) GLA (m2)	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 to be utilised
158570 RE	29 338 m ²	892 m ²
149294 RE	854 442 m ²	10 000 m ²
177854	1 095 m ²	419 m ²
179076	4125 m ²	89 m ²

Parcel O: Residential/Hotel

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: 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 a specialist and educational facilities associated with the rehabilitation of turtles. 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 Square. 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, to allow for improved views of the water.

1.2 ZONING

The site is currently zoned as Mixed Use 3 (MU3) in terms of the CoCTs Municipal Planning Bylaw (2025 as amended) (Figure 3). This zoning allows for primary uses such as Business premises, industry,

dwelling house, second dwelling, boarding house, flats, place of instruction, place of worship, institution, hospital, place of assembly, place of entertainment, hotel, conference facility, authority use, utility service, rooftop base telecommunication station, transport use, multiple parking garage, private road, open space, chancery, electric vehicle charging stations, micro wind turbine, structure mounted energy system and filming.

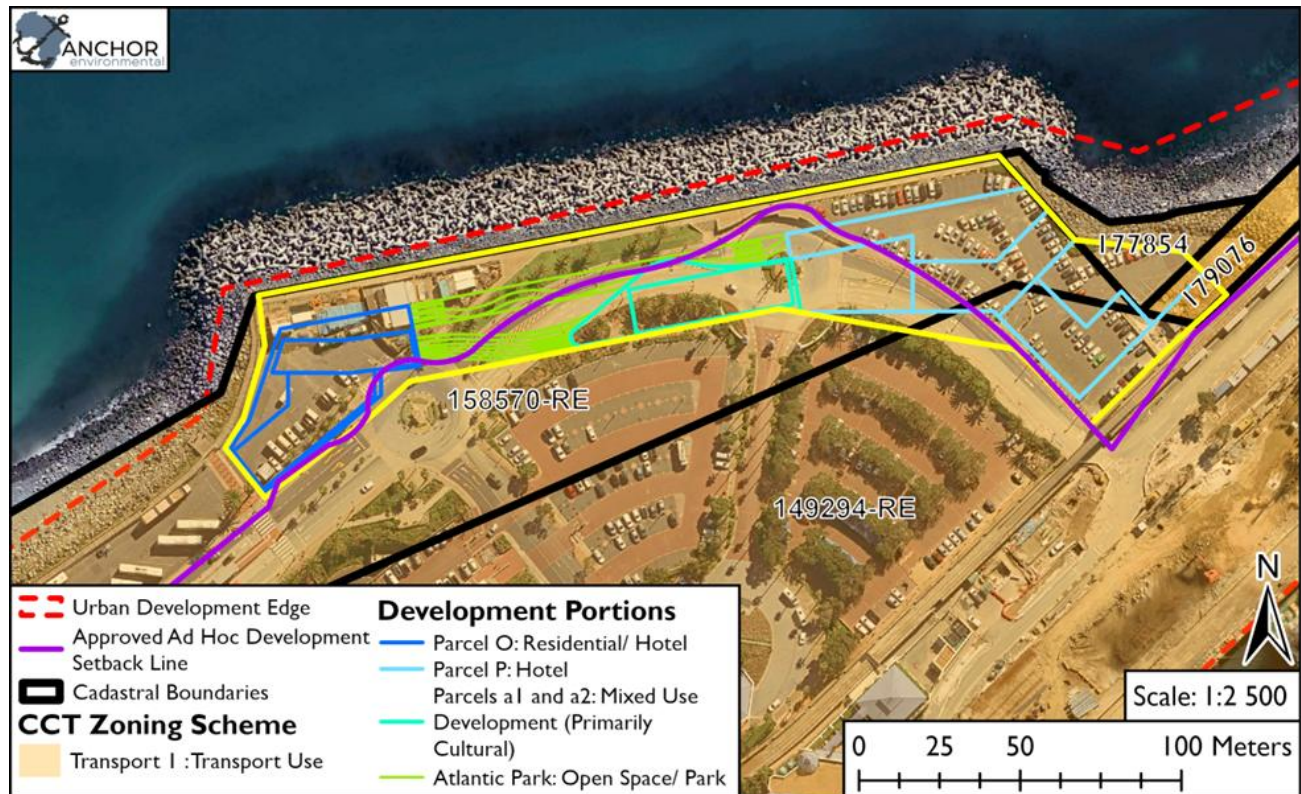


Figure 3. Land zoning for the proposed development.

1.3 SERVICES

General Pipeline Infrastructure

The proposed development will utilise existing approved bulk development rights, and therefore the CoCT is obliged to meet the service infrastructure demands of the proposed development. Existing pipeline infrastructure is located within the Breakwater Street, adjacent to the proposed site. A Capacity Letter will be submitted as an appendix with the Final Basic Assessment Report (BAR).

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 m³/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 require for 39m³ /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 CoCT 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 will have an initial production capacity of produce 3,300 m³/d and will be upgradable, with minimal disruption, to 5,000 m³/d in future.

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 (a letter of confirmation will be submitted as an appendix to the BAR). The Municipal supply will be augmented with renewable energy (wind and solar). However, the approvals for these installations will only applied for as individual buildings are required.

I.4 ALTERNATIVES

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.

Alternative building designs have, however, been explored. Details of these can be provided to the specialist for consideration and assessment, should this be required.

I.5 ENVIRONMENTAL AUTHORISATION PROCESS

In terms of the EIA Regulations, certain activities, known as Listed Activities and published in Listing Notices (LN) 1, 2 and 3, may result in environmental, socio-economic or cultural heritage impacts and therefore require assessment and EA from the competent authority, in this case the DEA&DP, prior to commencement. Activities listed under LN 1 and LN 3 typically relate to smaller-scale developments and require assessment through a BA process. As the proposed development triggers activities under LN 1, EA must be obtained through a BA process. The BA process entails the assessment of potential environmental impacts associated with the proposed development. This includes desktop studies, the appointment of relevant specialists to undertake specialist assessments, and the compilation of findings into a BAR. The BAR is made available to interested and affected parties for review and comment as part of the public participation process. All comments received are compiled into a Comments and Response Report (CRR) and are considered in the updating of the BAR, where applicable, prior to submission of the final BAR and CRR to DEA&DP for decision-making on the EA application.

Anchor has therefore been appointed as the Environmental Assessment Practitioner (EAP) to coordinate the required specialist studies and to manage and facilitate the BA process.

2. SCREENING TOOL & SITE SENSITIVITY VERIFICATION (SSV) OUTCOME

The Screening Tool identified the study area as having “Very High” Archaeological and Cultural Heritage significance, due to it being within 5km of a Grade I and within 2km of a Grade II Heritage site. This is confirmed to be accurate, as the area holds considerable heritage and cultural value due to its setting within Cape Town. The EAP consulted with the Heritage Specialist, Cindy Postlethwayt, and reviewed her previous report and study on the area. Based on this, the EAP agrees with the assigned sensitivity rating and confirms that a HIA is required.

Additionally, the RoD (under Section 38(1) of the NHRA), issued by HWC on 28 October 2024 for a previous V&A project, stipulated that any future development on the identified parcels (O, P, a1, and a2) must be subject to further heritage assessment requirements in terms of Section 38 of the NHRA. It specifically required the submission of a NID and a comprehensive HIA, with a more detailed analysis of the site, its significance, and site-specific heritage indicators.

A NID for the current Parcels was subsequently submitted to HWC on 28 May 2025 and their Response to the NID (RNID) received on 9 June 2025. It states that a HIA with Archaeological Impact Assessment (IAI), townscape and visual analysis is required (collectively referred to as an HIA). This HIA will serve both the NEMA and NHRA processes.

3. OVERVIEW OF THE TERMS OF REFERENCE AND REQUIREMENTS FOR SPECIALIST STUDIES

- The appointed Consultant is required to undertake the specialist investigation and compile a report in accordance with the Scope of Work (SoW) and ToR provided in this document.
- The specialist is required to submit a NID for the current Parcels to HWC (note that this task was completed on 28 May 2025).
- The specialist report must be prepared in line with applicable legal, policy, and procedural requirements, particularly in relation to assessment methodologies and reporting standards. This includes, but is not limited to:
 - NEMA; Act 107 of 1998, ensuring alignment with the EIA Regulations and that the report is suitable as a standalone specialist report within the EIA process;
 - NHRA; Act No. 25 of 1999, where relevant, including compliance with Sections 38;
 - The requirements for specialist reports as set out in Appendix 6 of the EIA Regulations (General Gazetted Requirements);
 - DEA&DP guideline for involving heritage specialists in EIA processes (2005), where applicable;
 - DEAT (2006) Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006. Integrated Environmental

Management Guideline Series, Department of Environmental Affairs and Tourism (DEAT), Pretoria.

- Any other applicable legislation, regulations, or guidance documents.

Minimum Requirements for the Specialist Study and Report:

The specialist study must address the following:

- Describe the current environmental baseline relevant to the specialist field;
- Identify and evaluate potential impacts (both positive and negative) associated with the proposed development, applying the prescribed impact assessment methodology (refer to the end of the document);
- Propose appropriate mitigation measures / actions to manage negative impacts and, where possible, enhance positive outcomes;
- Recommend monitoring requirements, where relevant, to verify the implementation and effectiveness of mitigation measures;
- Assess the environmental acceptability of any considered alternatives and identify a preferred alternative, where applicable;
- Provide a substantiated professional opinion on the acceptability of the proposed development within the context of the specialist discipline;
- Highlight any conditions that should be attached to potential authorisation;
- Clearly state any assumptions, limitations, and uncertainties associated with the assessment;
- Identify any additional work or investigations that may be required;
- Respond to issues relevant to the specialist discipline that arise during the public participation process; and
- Present the above in a structured specialist report that complies with the relevant regulatory requirements.

4. DETAILED SPECIALIST STUDY TERMS OF REFERENCE AND REPORT CONTENT

Specialists are required to consider the following requirements during the preparation and compilation of the specialist report:

- The specialist report is intended for use by stakeholders, members of the public and authorities. It must therefore be written in a clear and accessible manner, with technical terminology minimised where possible. Where technical terms are necessary, these must be explained in a dedicated glossary.
- All figures, maps, and spatial outputs must be of high resolution and suitable for inclusion in the Basic Assessment Report, where required.
- The report must align with and be informed by the requirements outlined in Section 3.
- As a minimum, the specialist study and report must include the following components:

1.6 EXECUTIVE SUMMARY

The Executive Summary should briefly outline the purpose and context of the assessment and provide a short description of the proposed development. It must present an accurate, clear, and comprehensive summary of the baseline environment, impact assessment (including a summary table of identified impacts) and mitigation measures, as well as clearly set out the key findings, conclusions, and recommendations of the study. The summary must be written in a manner that is readily understandable to non-specialists and must avoid detailed technical discussion and jargon.

The Executive Summary is likely to serve as a primary source of information for inclusion in the BAR and should therefore provide a clear, accurate, and comprehensive summary of the content of the report.

1.7 DECLARATION BY SPECIALIST

The report must include a signed declaration by the specialist in the format required by the Competent Authority. This template will be provided by the EAP. Depending on the requirements of the Competent Authority, the declaration may need to be signed in the presence of a Commissioner of Oaths.

1.8 SPECIALIST EXPERTISE

This section must provide a summary of the specialist's qualifications, professional registrations, relevant experience, and area of expertise as it relates to the study. A full Curriculum Vitae must be included in the appendices, along with copies of relevant qualifications and professional registration certificates (certified if required).

1.9 ACRONYMS/ ABBREVIATIONS

A list of all acronyms and abbreviations used throughout the report must be provided to ensure clarity and ease of reference.

1.10 GLOSSARY (IF APPLICABLE)

Where technical terminology is used, a glossary must be included defining key terms used within the specialist report

1.11 INTRODUCTION

The introduction must provide the background to the project and clearly explain the purpose and scope of the specialist study. It should briefly describe the proposed development, including its key components. The study area must also be described, with clear indication of the spatial extent relevant to the assessment. The section must be supported by appropriate maps clearly illustrating the study area.

1.12 LEGISLATIVE REVIEW

This section must identify and briefly describe all legislation, policies, guidelines, and regulatory requirements relevant to the specialist discipline and the proposed development. It must further explain how the development responds to and complies with these requirements.

1.13 ASSUMPTIONS AND LIMITATIONS

All assumptions, limitations, data gaps, and uncertainties associated with the assessment must be clearly stated. This includes any constraints that may have influenced the scope, accuracy, or interpretation of the findings.

1.14 METHODOLOGY/ APPROACH TO THE STUDY

This section must describe the overall approach adopted for the study, including the methods used to collect, analyse, and interpret baseline data. Information sources must be identified, and the appropriateness of the methodologies applied must be briefly justified. Where relevant, the knowledge of local communities or stakeholders should be incorporated. The assessment should primarily be based on accepted scientific methods; however, where data is limited, professional judgement and experience must be applied and clearly stated. The ToR for the specialist study must also be included in this section or referenced appropriately.

1.15 DESCRIPTION OF THE AFFECTED ENVIRONMENT (BASELINE DESCRIPTION)

The specialist must provide a comprehensive description of the existing conditions within the study area, relevant to their field of expertise (i.e., environmental, social, economic, etc.). This must include both site-specific conditions and the broader surrounding environment to ensure appropriate contextual understanding.

The baseline description must incorporate data obtained through desktop review and field surveys, where applicable. The adequacy of any existing baseline information must be assessed, and updated where necessary if it materially affects the outcomes of the study.

The uniqueness and irreplaceability of the site must be considered within a broader local, regional, and where relevant, national context. This should be informed by comparison with available datasets and existing scientific information.

The specialist must also provide an assessment of environmental sensitivity. In this context, sensitivity refers to the capacity of the environment to absorb or withstand disturbance, taking cumulative impacts into account. Environments with low resilience, where small disturbances may result in significant or irreversible change, should be identified as highly sensitive. Conversely, environments that can accommodate higher levels of disturbance without significant degradation may be considered less sensitive.

1.16 IMPACT IDENTIFICATION AND ASSESSMENT

1.16.1 DETERMINATION OF IMPACTS

1. Direct impacts

Potential impacts (both positive and negative) associated with the proposed development should be identified, described, and assessed in terms of their significance, using the methodology outlined below. The impact should be re-assessed after assuming that effective mitigation measures have been implemented.

Impacts should also be classified as either direct or indirect:

- **Direct impacts** refer to the immediate impacts associated with the development and its activities. These relate to the physical footprint of the project and direct interactions with the receiving environment.
- **Indirect impacts** refer to secondary or induced impacts that occur as a consequence of the development and are typically removed in time or space from the initial activity. These impacts are not caused directly by the project itself, but rather through an intervening process or chain of events. For example, the establishment of new access roads for a development may lead to increased informal settlement or resource harvesting in previously undisturbed areas, resulting in additional environmental degradation. These could be described qualitatively if necessary.

2. Assessment of Alternatives

Impacts associated with any identified alternatives considered as part of the EIA process must also be assessed using the methodology outlined below.

4. Cumulative impacts

Potential cumulative impacts (both positive and negative) associated with the proposed development (preferred alternative only) should be identified, described, and assessed. This assessment should recognise that cumulative impacts occur when:

- Multiple impacts from a single activity, or from different activities, affect the natural or social environment with such frequency over time or intensity in space that the environment is unable to absorb or recover from them; or
- Impacts from one activity interact with those of the same or other activities in a combined or synergistic manner, resulting in greater overall effects than when considered individually.
- They consider the additional contribution of the proposed development to the combined impacts of past, present, and reasonably foreseeable future activities.

The cumulative impact assessment will generally be qualitative and descriptive in nature. Where appropriate, the methodology outlined below, can be applied.

Project Phases for the Impact Assessment

For the above assessments, impacts should be divided into the following phases:

- **Construction phase**, referring to impacts arising from the construction of the development and all associated infrastructure;

- **Operational phase**, referring to impacts occurring during the post-construction operation of the development; and
- **Decommissioning phase** (if applicable), referring to impacts associated with the cessation of operations, dismantling of infrastructure, and rehabilitation of the site.

‘No-Go’ / Do Nothing alternative

Impacts (both positive and negative) of the ‘No-Go’ or Do-Nothing alternative must also be identified, described, and assessed using the methodology outlined below.

1.16.2 CONSTRAINTS AND NO-GO AREAS

The impact assessment must also identify any constraints that may critically affect the development’s feasibility. This includes highlighting any fatal flaws, defined as significant adverse impacts that cannot be effectively mitigated and that would render the project or specific components thereof unacceptable within a particular area. Any areas that should be avoided (no-go areas) must be clearly identified and justified. Where a fatal flaw is identified, this must be explicitly stated, together with a clear explanation of the implications for the project.

1.16.3 MITIGATION/ OPTIMISATION MEASURES AND IMPACT MANAGEMENT ACTIONS AND OUTCOMES

Mitigation measures refer to practical actions designed to reduce negative impacts, while optimisation measures are intended to enhance positive impacts/ beneficial outcomes. Specialists must identify and describe practical mitigation and optimisation measures that can be implemented to reduce the significance of negative impacts and/or enhance positive impacts effectively.

Where applicable, specialists must also recommend suitable monitoring and review measures or programmes to ensure the proper implementation of mitigation measures and to assess their ongoing effectiveness.

The mitigation measures recommended by specialists form the foundation for management actions in the Environmental Management Programme (EMPr). An EMPr is required for any project subjected to an EIA and serves as a proactive management tool to guide consistent and ongoing environmental management throughout the life cycle of a development. Its purpose is to prevent or minimise negative impacts while enhancing positive benefits.

The EMPr, however, adopts an outcome-based approach, setting out management actions designed to achieve defined environmental outcomes. In general, mitigation measures represent the ‘what’, the specific recommendations to avoid, reduce, or manage potential environmental impacts, while the actions in the EMPr describe the ‘how’, the specific steps, procedures, and responsibilities required to implement and monitor those measures.

To ensure that mitigation measures are effectively translated into EMPr actions, specialists should develop mitigation measures with an outcome-based approach in mind. These actions or measures should therefore not only reduce the significance of impacts, but also contribute to achieving a clearly defined desired outcome. The outcome/s should be clearly indicated for each impact (see Step 6 in the Impact Assessment Methodology).

In many cases, a single overarching impact management outcome may apply to multiple impacts and may in some instances be applicable across all impacts assessed within a specialist report.

While impacts are assessed for the construction, operational, and decommissioning phases, in some instances impact management outcomes and actions (mitigation measures) may also be identified for the pre-construction or design phase.

Mitigation and optimisation measures must be classified as either:

- **Essential:** These are mandatory for implementation and are non-negotiable. These measures are assumed to be implemented in the “with mitigation” impact scenario and are therefore incorporated into the final assessment of impact significance.
- **Best Practice / Recommended:** These are optional but should be considered for implementation where feasible. These are considered desirable enhancements. However, their non-implementation will not alter the impact rating. In such cases, the applicant must provide a clear and defensible justification for not adopting these measures.

Refer to Step 6 in the Impact Assessment Methodology.

1.17 ENVIRONMENTAL ACCEPTABILITY AND COMPARISON OF ALTERNATIVES

The specialist must evaluate the environmental acceptability of each identified alternative by considering whether the associated impacts are acceptable within the context of the receiving environment. Based on this assessment, the specialist must identify the environmentally preferred alternative and provide a clear, reasoned motivation for this selection, taking into account the comparative significance of impacts and the effectiveness of proposed mitigation measures.

1.18 CONCLUSIONS AND RECOMMENDATIONS

This section must provide a concise synthesis of the key findings of the specialist study, including a summary of the identified impacts and any significant issues of concern. It must indicate the environmental suitability or unsuitability of the assessed alternatives and confirm the preferred alternative, where applicable.

A clear, reasoned opinion must be provided on whether the proposed development should be authorised from the perspective of the specialist discipline. This must be supported by the key mitigation measures required to achieve acceptability, and any recommended conditions of approval must be clearly specified.

The section must also outline any recommended further work, where justified, and indicate an appropriate way forward. Recommendations for additional studies must be well substantiated and limited to those that are necessary.

1.19 REFERENCES

All information sources consulted during the study must be properly cited and listed in this section. While no specific referencing format is prescribed, a consistent and recognised referencing style should be applied throughout.

5. REPORT SUBMISSION AND REVIEW

Draft Specialist Reports, incorporating all required components outlined above, must be submitted electronically to Anchor for review by Anchor and the Client. Draft reports must be provided in Word format to enable review and commenting using track changes. Specialists are encouraged to submit complete and well-developed draft reports to minimise the need for multiple review iterations. Thereafter, specialists must revise their reports accordingly.

The revised Draft Specialist Report will be made available as part of the EIA public participation process. Following this, further updates may be required to address comments received and to finalise the report (see Section 6 below). The Final Specialist Report must incorporate all relevant and valid comments received during the review and public participation processes. Final reports must be submitted to Anchor in both Word and PDF formats.

Anchor will integrate the findings of the specialist studies into the BAR. In doing so, Anchor reserves the right to copy text directly from the specialist reports (verbatim) or to paraphrase content as required.

The Executive Summary is likely to serve as a primary source of information for inclusion in the BAR and should therefore provide a clear, accurate, and comprehensive summary of the baseline environment, impact assessment and mitigation, as well as the key findings and recommendations.

6. RESPONSES TO COMMENTS DURING THE PUBLIC PARTICIPATION PROCESS AND UPDATE OF REPORT

The specialist may be required to assist in responding to comments that are relevant to their field of expertise received during the public participation process. Adequate provision should therefore be made in the proposal for reviewing and responding to such comments.

Where necessary, the specialist will be required to revise and update the Draft Specialist Report to address relevant and substantive comments arising from the public participation process.

7. ADDITIONAL SPECIALIST STUDIES

A number of additional specialist studies are being undertaken as part of the overall assessment process. Information on these studies is provided in Table 3 below. Should engagement between specialists be required to ensure alignment of assumptions, consistency of information, and integration of findings across disciplines, Anchor must be informed. Anchor will then confirm with the relevant specialist and provide the necessary contact details to facilitate engagement. Alternatively, liaison may be coordinated through the Environmental Assessment Practitioner (EAP), Ms Cheruscha Swart. All communication with project engineers and planners must be undertaken through the EAP, Ms Cheruscha Swart.

Table 3. Additional specialist studies and specialist contact information.

Study	Specialist	Organisation
Heritage Impact Assessment	Ms Cindy Postlethwayt	Cindy Postlethwayt Heritage
Visual and Townscape Impact Assessment	Ms Claire Abrahamse	Claire Abrahamse Architecture, Urban Design, Heritage
Socio-Economic Impact Assessment	Ms Gwyn Letley	Anchor Environmental Consultants
Marine Compliance Statement	Ms Amy Wright	Anchor Environmental Consultants

8. TIMING

This should be updated as per the project schedule

Appointment	Date
Draft Impact Assessment Report completed	2 April 2026
Anchor/ client Review completed	14 April 2026
Updated draft Report completed	21 April 2026
Public Participation Process	TBC
Updated/ Final Specialist Report completed	TBC
Specialist issues Final Impact Assessment Report	TBC

It is crucial that the deadlines for submission of specialist studies are met.

9. INVOICING AND PROJECT MANAGEMENT

Invoices must be submitted via email to Cheruscha Swart (cher@anchorenvironmental.co.za), and addressed to Anchor Environmental Consultants (Pty) Ltd (admin@anchorenvironmental.co.za).

27 March 2026

Attention: Gwyneth Letley

RE: BASIC ASSESSMENT PROCESS FOR THE 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

SOCIO-ECONOMIC SPECIALIST IMPACT ASSESSMENT TERMS OF REFERENCE

Anchor Environmental Consultants (Pty) Ltd has been appointed by the Victoria & Alfred Waterfront (V&AW; the Applicant/ Client) in Cape Town to undertake a Basic Assessment (BA) process to obtain Environmental Authorisation (EA) for a proposed mixed-use development located on the northeast edge of the V&A Waterfront (see Figure 1). The proposed development is described in detail in Section 1. This application is being conducted in accordance with the National Environmental Management Act, 1998 (Act No. 107 of 1998; (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended). As part of the BA process, various specialist studies are required, including a Socio-Economic Impact Assessment.

Anchor Environmental Consultants conducts its own in-house socio-economic studies, with Gwyneth Letley, Senior Associate, as the lead socio-economic specialist. Gwyn has a MSc in Conservation Biology from the University of Cape Town and a postgraduate certificate in Applied Environmental Economics from the University of London. Over the past 16 years Gwyn has worked on the social and economic aspects of natural resource management and conservation, including the quantitative socio-economic aspects of conservation-development problems across Africa. Gwyn is experienced in the economic appraisal of nature-based solutions, natural climate solutions and ecosystem restoration. Therefore, Gwyn has been approached and appointed to conduct a socio-economic impact assessment as part of the NEMA BA process.

The scope of work for the required specialist study, in support of both the BA process, is outlined in the Terms of Reference (ToR) included in this letter. The ToR are intended to guide the focus of the specialist study, rather than prescribe it in detail. In addition, not all aspects of the ToR will be applicable to every specialist. The ToR are therefore provided as a broad framework and specialists are encouraged to apply their professional judgement and experience in refining and expanding the scope where necessary and as relevant to their specific discipline, in consultation with Anchor.

Please note that your appointment will be made directly by Anchor. Any queries relating to the project scope, programme, or budget can therefore be directed to Cheruscha Swart at Anchor.

Should a site visit be required, Anchor must be notified at least two weeks in advance to allow for appropriate arrangements to be made.

Kind regards,

A handwritten signature in black ink, appearing to read 'Cheruscha Swart', with a long horizontal flourish extending to the right.

Cheruscha Swart

Environmental Assessment Practitioner and Senior Consultant

Anchor Environmental Consultants (Pty) Ltd

I. PROJECT DESCRIPTION

I.1 BACKGROUND

The 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 is now proposing a mixed-use development within its Breakwater Precinct, on Erven 158570 RE, 149294 RE, 177854 and 179076, situated adjacent to the Port of Cape Town and V&AW Harbour and north of the Table Bay Hotel (Figure 1). The site is currently used as an overflow parking area and container storage site.

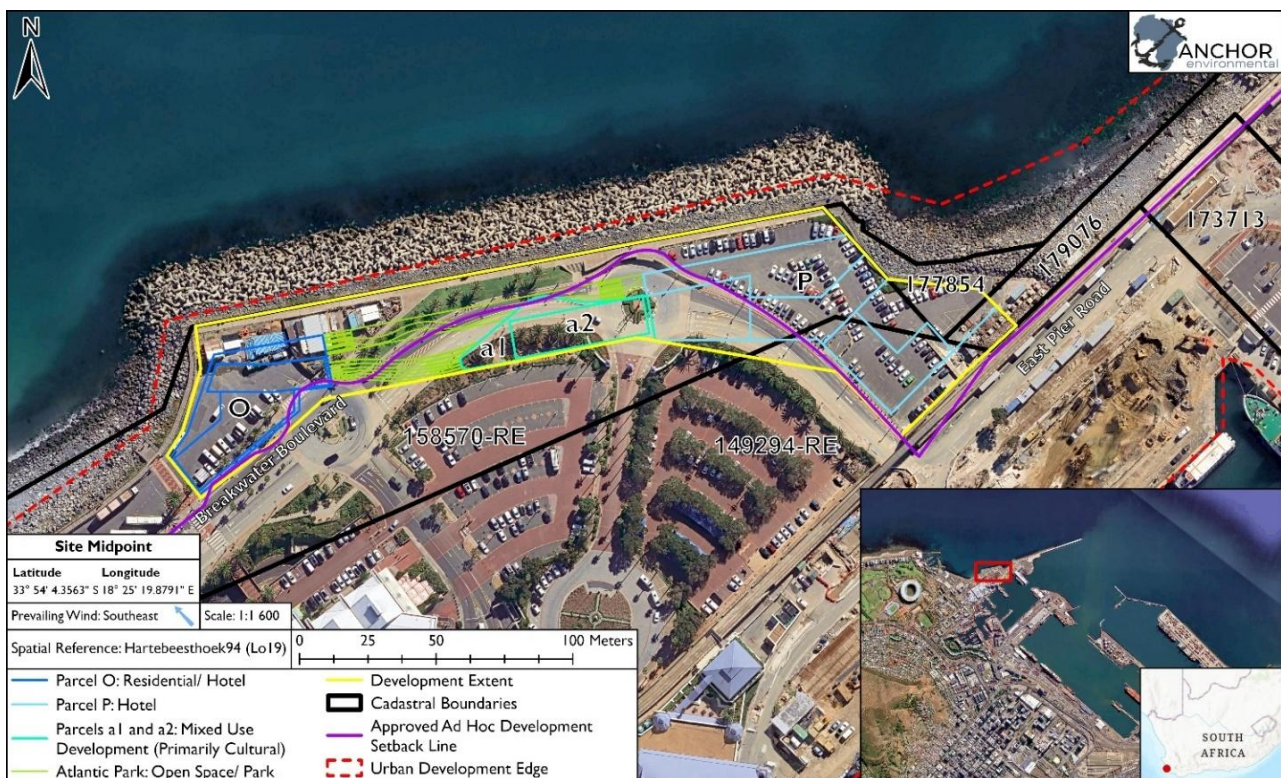


Figure 1. Location of the proposed mixed-use development on Erven 158570 RE, 149294 RE, 177854 and 179076 within the V&A Waterfront, Cape Town. The original layout and land use of the site are also visible, including existing infrastructure such as roads, parking areas, landscaped lawns with palm trees,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

The project involves the redevelopment of the site (portions of Erven 158570 RE, 149294 RE, 177854 and 179076) into a mixed-use precinct with a total development footprint of approximately 12 700 m² (1,27ha). 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 2). The proposal also includes all associated infrastructure and structures located between these components. The development will have a maximum building height of 32 m above Existing Ground Level for Parcel O. Key building dimensions and footprints are summarised in Table 1 and Table 2.

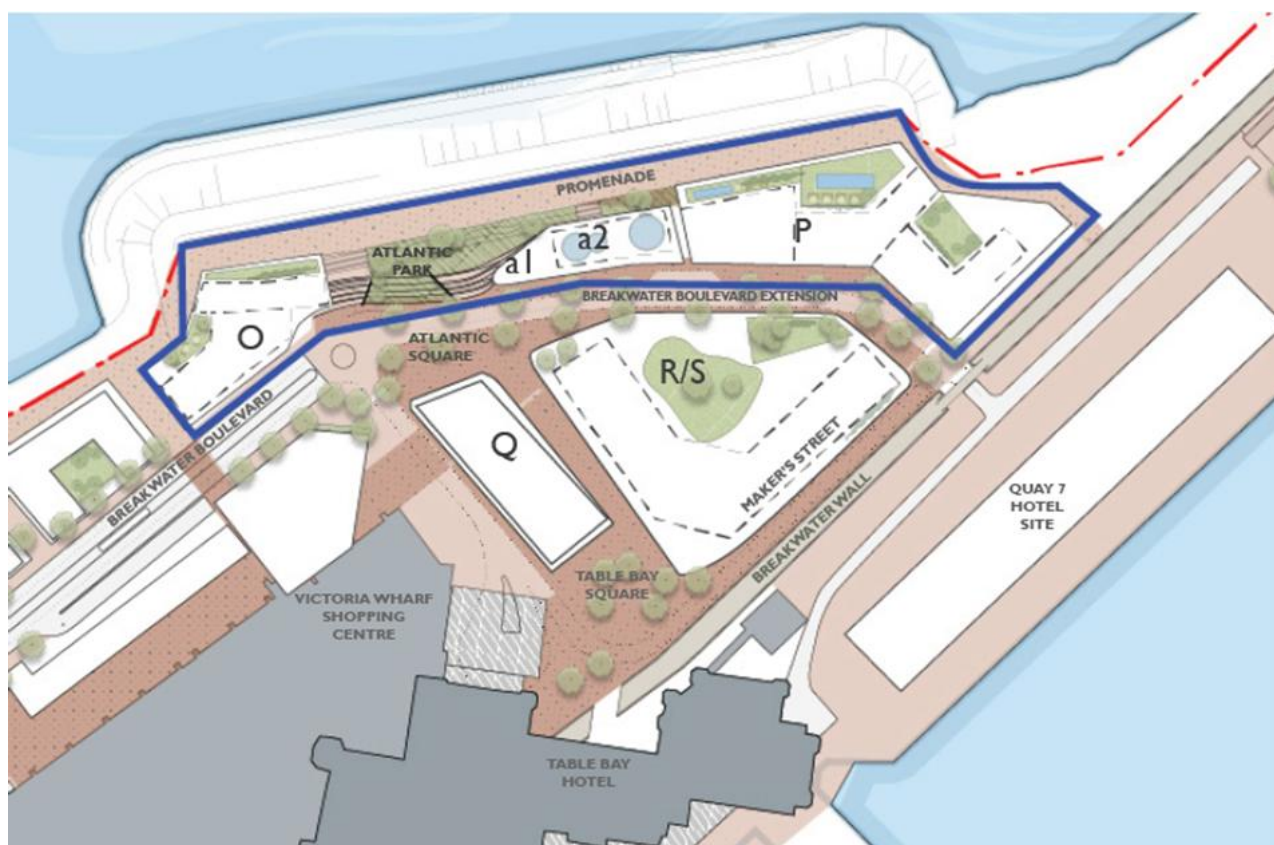


Figure 2. Proposed development layout and design for this project. This phase includes Block P, O and a1 & a2, Atlantic Park and the Promenade.

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)	Bulk/Block (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 to be utilised
158570 RE	29 338 m ²	892 m ²
149294 RE	854 442 m ²	10 000 m ²
177854	1 095 m ²	419 m ²
179076	4125 m ²	89 m ²

Parcel O: Residential/Hotel

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: 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 a specialist and educational facilities associated with the rehabilitation of turtles. 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 Square. 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, to allow for improved views of the water.

1.2 ZONING

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

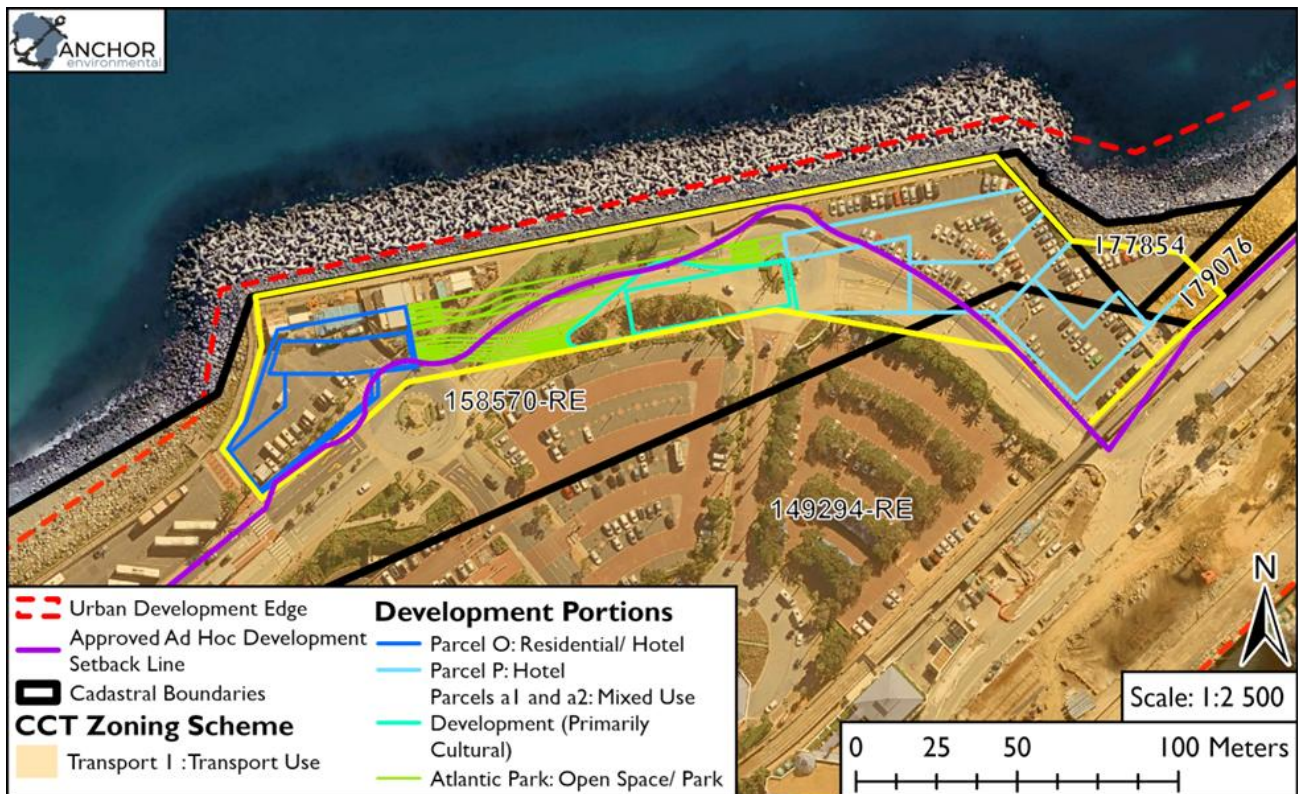


Figure 3. Land zoning for the proposed development.

1.3 SERVICES

General Pipeline Infrastructure

The proposed development will utilise existing approved bulk development rights, and therefore the CoCT is obliged to meet the service infrastructure demands of the proposed development. Existing pipeline infrastructure is located within the Breakwater Street, adjacent to the proposed site. A Capacity Letter will be submitted as an appendix with the Final Basic Assessment Report (BAR).

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 m³/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 require 39m³ /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 CoCT 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 will have an initial production capacity of produce 3,300 m³/d and will be upgradable, with minimal disruption, to 5,000 m³/d in future.

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 (a letter of confirmation will be submitted as an appendix to the BAR). The Municipal supply will be augmented with renewable energy (wind and solar). However, the approvals for these installations will only be applied for as individual buildings are required.

1.4 ALTERNATIVES

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.

Alternative building designs have, however, been explored. Details of these can be provided to the specialist for consideration and assessment, should this be required.

1.5 ENVIRONMENTAL AUTHORISATION PROCESS

In terms of the EIA Regulations, certain activities, known as Listed Activities and published in Listing Notices (LN) 1, 2 and 3, may result in environmental, socio-economic or cultural heritage impacts and therefore require assessment and EA from the competent authority, in this case the DEA&DP, prior to commencement. Activities listed under LN 1 and LN 3 typically relate to smaller-scale developments and require assessment through a BA process. As the proposed development triggers activities under LN 1, EA must be obtained through a BA process. The BA process entails the assessment of potential environmental impacts associated with the proposed development. This includes desktop studies, the appointment of relevant specialists to undertake specialist assessments, and the compilation of findings into a BAR. The BAR is made available to interested and affected parties for review and comment as part of the public participation process. All comments received are compiled into a Comments and Response Report (CRR) and are considered in the updating of the BAR, where applicable, prior to submission of the final BAR and CRR to DEA&DP for decision-making on the EA application.

Anchor has therefore been appointed as the Environmental Assessment Practitioner (EAP) to coordinate the required specialist studies and to manage and facilitate the BA process.

2. SCREENING TOOL & SITE SENSITIVITY VERIFICATION (SSV) OUTCOME

The Department of Forestry, Fisheries and Environment (DFFE) Screening Tool identified the need for a Socio-Economic Impact Assessment. Even though the DFFE Screening Tool provided no impact rating for the theme, the reason for the identification is likely due to the development's selected Application Category, which often triggers this assessment by default. This may also be due to the site's location within a highly urbanised area of Cape Town, and the fact that developments in certain areas, particularly in dense urban environments, tend to trigger this assessment by default. Given the nature and location of this project, there are bound to be social and economic benefits or potential implications, that need to be assessed. Consequently, the identification and assessment of these impacts would be valuable. The recommendation is therefore considered accurate, and the EAP agrees that a Socio-Economic Impact Assessment is warranted.

3. OVERVIEW OF THE TERMS OF REFERENCE AND REQUIREMENTS FOR SPECIALIST STUDIES

- The appointed Consultant is required to undertake the specialist investigation and compile a report in accordance with the Scope of Work (SoW) and ToR provided in this document.
- The specialist report must be prepared in line with applicable legal, policy, and procedural requirements, particularly in relation to assessment methodologies and reporting standards. This includes, but is not limited to:
 - NEMA; Act 107 of 1998, ensuring alignment with the EIA Regulations and that the report is suitable as a standalone specialist report within the EIA process;
 - The requirements for specialist reports as set out in Appendix 6 of the EIA Regulations (General Gazetted Requirements);
 - DEA&DP guideline for involving socio-economic specialists in EIA processes (2005), where applicable;
 - DEAT (2006) Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006. Integrated Environmental Management Guideline Series, Department of Environmental Affairs and Tourism (DEAT), Pretoria.
 - Any other applicable legislation, regulations, or guidance documents.

Minimum Requirements for the Specialist Study and Report:

The specialist study must address the following:

- Describe the current environmental baseline relevant to the specialist field;
- Identify and evaluate potential impacts (both positive and negative) associated with the proposed development, applying the prescribed impact assessment methodology (refer to the end of the document);
- Propose appropriate mitigation measures / actions to manage negative impacts and, where possible, enhance positive outcomes;
- Recommend monitoring requirements, where relevant, to verify the implementation and effectiveness of mitigation measures;
- Assess the environmental acceptability of any considered alternatives and identify a preferred alternative, where applicable;
- Provide a substantiated professional opinion on the acceptability of the proposed development within the context of the specialist discipline;
- Highlight any conditions that should be attached to potential authorisation;
- Clearly state any assumptions, limitations, and uncertainties associated with the assessment;
- Identify any additional work or investigations that may be required;
- Respond to issues relevant to the specialist discipline that arise during the public participation process; and
- Present the above in a structured specialist report that complies with the relevant regulatory requirements.

4. DETAILED SPECIALIST STUDY TERMS OF REFERENCE AND REPORT CONTENT

Specialists are required to consider the following requirements during the preparation and compilation of the specialist report:

- The specialist report is intended for use by stakeholders, members of the public and authorities. It must therefore be written in a clear and accessible manner, with technical terminology minimised where possible. Where technical terms are necessary, these must be explained in a dedicated glossary.
- All figures, maps, and spatial outputs must be of high resolution and suitable for inclusion in the Basic Assessment Report, where required.
- The report must align with and be informed by the requirements outlined in Section 3.
- As a minimum, the specialist study and report must include the following components:

1.6 EXECUTIVE SUMMARY

The Executive Summary should briefly outline the purpose and context of the assessment and provide a short description of the proposed development. It must present an accurate, clear, and comprehensive summary of the baseline environment, impact assessment (including a summary table of identified impacts) and mitigation measures, as well as clearly set out the key findings, conclusions, and recommendations of the study. The summary must be written in a manner that is readily understandable to non-specialists and must avoid detailed technical discussion and jargon.

The Executive Summary is likely to serve as a primary source of information for inclusion in the BAR and should therefore provide a clear, accurate, and comprehensive summary of the content of the report.

1.7 DECLARATION BY SPECIALIST

The report must include a signed declaration by the specialist in the format required by the Competent Authority. This template will be provided by the EAP. Depending on the requirements of the Competent Authority, the declaration may need to be signed in the presence of a Commissioner of Oaths.

1.8 SPECIALIST EXPERTISE

This section must provide a summary of the specialist's qualifications, professional registrations, relevant experience, and area of expertise as it relates to the study. A full Curriculum Vitae must be included in the appendices, along with copies of relevant qualifications and professional registration certificates (certified if required).

1.9 ACRONYMS/ ABBREVIATIONS

A list of all acronyms and abbreviations used throughout the report must be provided to ensure clarity and ease of reference.

1.10 GLOSSARY (IF APPLICABLE)

Where technical terminology is used, a glossary must be included defining key terms used within the specialist report

1.11 INTRODUCTION

The introduction must provide the background to the project and clearly explain the purpose and scope of the specialist study. It should briefly describe the proposed development, including its key components. The study area must also be described, with clear indication of the spatial extent relevant to the assessment. The section must be supported by appropriate maps clearly illustrating the study area.

1.12 LEGISLATIVE REVIEW

This section must identify and briefly describe all legislation, policies, guidelines, and regulatory requirements relevant to the specialist discipline and the proposed development. It must further explain how the development responds to and complies with these requirements.

1.13 ASSUMPTIONS AND LIMITATIONS

All assumptions, limitations, data gaps, and uncertainties associated with the assessment must be clearly stated. This includes any constraints that may have influenced the scope, accuracy, or interpretation of the findings.

1.14 METHODOLOGY/ APPROACH TO THE STUDY

This section must describe the overall approach adopted for the study, including the methods used to collect, analyse, and interpret baseline data. Information sources must be identified, and the appropriateness of the methodologies applied must be briefly justified. Where relevant, the knowledge of local communities or stakeholders should be incorporated. The assessment should primarily be based on accepted scientific methods; however, where data is limited, professional judgement and experience must be applied and clearly stated. The ToR for the specialist study must also be included in this section or referenced appropriately.

1.15 DESCRIPTION OF THE AFFECTED ENVIRONMENT (BASELINE DESCRIPTION)

The specialist must provide a comprehensive description of the existing conditions within the study area, relevant to their field of expertise (i.e., environmental, social, economic, etc.). This must include both site-specific conditions and the broader surrounding environment to ensure appropriate contextual understanding.

The baseline description must incorporate data obtained through desktop review and field surveys, where applicable. The adequacy of any existing baseline information must be assessed, and updated where necessary if it materially affects the outcomes of the study.

The uniqueness and irreplaceability of the site must be considered within a broader local, regional, and where relevant, national context. This should be informed by comparison with available datasets and existing scientific information.

The specialist must also provide an assessment of environmental sensitivity. In this context, sensitivity refers to the capacity of the environment to absorb or withstand disturbance, taking cumulative impacts into account. Environments with low resilience, where small disturbances may result in significant or irreversible change, should be identified as highly sensitive. Conversely, environments that can accommodate higher levels of disturbance without significant degradation may be considered less sensitive.

1.16 IMPACT IDENTIFICATION AND ASSESSMENT

1.16.1 DETERMINATION OF IMPACTS

1. Direct impacts

Potential impacts (both positive and negative) associated with the proposed development should be identified, described, and assessed in terms of their significance, using the methodology outlined below. The impact should be re-assessed after assuming that effective mitigation measures have been implemented.

Impacts should also be classified as either direct or indirect:

- **Direct impacts** refer to the immediate impacts associated with the development and its activities. These relate to the physical footprint of the project and direct interactions with the receiving environment.
- **Indirect impacts** refer to secondary or induced impacts that occur as a consequence of the development and are typically removed in time or space from the initial activity. These impacts are not caused directly by the project itself, but rather through an intervening process or chain of events. For example, the establishment of new access roads for a development may lead to increased informal settlement or resource harvesting in previously undisturbed areas, resulting in additional environmental degradation. These could be described qualitatively if necessary.

2. Assessment of Alternatives

Impacts associated with any identified alternatives considered as part of the EIA process must also be assessed using the methodology outlined below.

4. Cumulative impacts

Potential cumulative impacts (both positive and negative) associated with the proposed development (preferred alternative only) should be identified, described, and assessed. This assessment should recognise that cumulative impacts occur when:

- Multiple impacts from a single activity, or from different activities, affect the natural or social environment with such frequency over time or intensity in space that the environment is unable to absorb or recover from them; or
- Impacts from one activity interact with those of the same or other activities in a combined or synergistic manner, resulting in greater overall effects than when considered individually.
- They consider the additional contribution of the proposed development to the combined impacts of past, present, and reasonably foreseeable future activities.

The cumulative impact assessment will generally be qualitative and descriptive in nature. Where appropriate, the methodology outlined below can be applied.

Project Phases for the Impact Assessment

For the above assessments, impacts should be divided into the following phases:

- **Construction phase**, referring to impacts arising from the construction of the development and all associated infrastructure;
- **Operational phase**, referring to impacts occurring during the post-construction operation of the development; and
- **Decommissioning phase** (if applicable), referring to impacts associated with the cessation of operations, dismantling of infrastructure, and rehabilitation of the site.

‘No-Go’ / Do Nothing alternative

Impacts (both positive and negative) of the ‘No-Go’ or Do-Nothing alternative must also be identified, described, and assessed using the methodology outlined below.

1.16.2 CONSTRAINTS AND NO-GO AREAS

The impact assessment must also identify any constraints that may critically affect the development's feasibility. This includes highlighting any fatal flaws, defined as significant adverse impacts that cannot be effectively mitigated and that would render the project or specific components thereof unacceptable within a particular area. Any areas that should be avoided (no-go areas) must be clearly identified and justified. Where a fatal flaw is identified, this must be explicitly stated, together with a clear explanation of the implications for the project.

1.16.3 MITIGATION/ OPTIMISATION MEASURES AND IMPACT MANAGEMENT ACTIONS AND OUTCOMES

Mitigation measures refer to practical actions designed to reduce negative impacts, while optimisation measures are intended to enhance positive impacts/ beneficial outcomes. Specialists must identify and describe practical mitigation and optimisation measures that can be implemented to reduce the significance of negative impacts and/or enhance positive impacts effectively.

Where applicable, specialists must also recommend suitable monitoring and review measures or programmes to ensure the proper implementation of mitigation measures and to assess their ongoing effectiveness.

The mitigation measures recommended by specialists form the foundation for management actions in the Environmental Management Programme (EMPr). An EMPr is required for any project subjected to an EIA and serves as a proactive management tool to guide consistent and ongoing environmental management throughout the life cycle of a development. Its purpose is to prevent or minimise negative impacts while enhancing positive benefits.

The EMPr, however, adopts an outcome-based approach, setting out management actions designed to achieve defined environmental outcomes. In general, mitigation measures represent the 'what', the specific recommendations to avoid, reduce, or manage potential environmental impacts, while the actions in the EMPr describe the 'how', the specific steps, procedures, and responsibilities required to implement and monitor those measures.

To ensure that mitigation measures are effectively translated into EMPr actions, specialists should develop mitigation measures with an outcome-based approach in mind. These actions or measures should therefore not only reduce the significance of impacts, but also contribute to achieving a clearly defined desired outcome. The outcome/s should be clearly indicated for each impact (see Step 6 in the Impact Assessment Methodology).

In many cases, a single overarching impact management outcome may apply to multiple impacts and may in some instances be applicable across all impacts assessed within a specialist report.

While impacts are assessed for the construction, operational, and decommissioning phases, in some instances impact management outcomes and actions (mitigation measures) may also be identified for the pre-construction or design phase.

Mitigation and optimisation measures must be classified as either:

- **Essential:** These are mandatory for implementation and are non-negotiable. These measures are assumed to be implemented in the "with mitigation" impact scenario and are therefore incorporated into the final assessment of impact significance.
- **Best Practice / Recommended:** These are optional but should be considered for implementation where feasible. These are considered desirable enhancements. However, their

non-implementation will not alter the impact rating. In such cases, the applicant must provide a clear and defensible justification for not adopting these measures.

Refer to Step 6 in the Impact Assessment Methodology.

1.17 ENVIRONMENTAL ACCEPTABILITY AND COMPARISON OF ALTERNATIVES

The specialist must evaluate the environmental acceptability of each identified alternative by considering whether the associated impacts are acceptable within the context of the receiving environment. Based on this assessment, the specialist must identify the environmentally preferred alternative and provide a clear, reasoned motivation for this selection, taking into account the comparative significance of impacts and the effectiveness of proposed mitigation measures.

1.18 CONCLUSIONS AND RECOMMENDATIONS

This section must provide a concise synthesis of the key findings of the specialist study, including a summary of the identified impacts and any significant issues of concern. It must indicate the environmental suitability or unsuitability of the assessed alternatives and confirm the preferred alternative, where applicable.

A clear, reasoned opinion must be provided on whether the proposed development should be authorised from the perspective of the specialist discipline. This must be supported by the key mitigation measures required to achieve acceptability, and any recommended conditions of approval must be clearly specified.

The section must also outline any recommended further work, where justified, and indicate an appropriate way forward. Recommendations for additional studies must be well substantiated and limited to those that are necessary.

1.19 REFERENCES

All information sources consulted during the study must be properly cited and listed in this section. While no specific referencing format is prescribed, a consistent and recognised referencing style should be applied throughout.

5. REPORT SUBMISSION AND REVIEW

Draft Specialist Reports, incorporating all required components outlined above, must be submitted electronically to Anchor for review by Anchor and the Client. Draft reports must be provided in Word format to enable review and commenting using track changes. Specialists are encouraged to submit complete and well-developed draft reports to minimise the need for multiple review iterations. Thereafter, specialists must revise their reports accordingly.

The revised Draft Specialist Report will be made available as part of the EIA public participation process. Following this, further updates may be required to address comments received and to finalise the report (see Section 6 below). The Final Specialist Report must incorporate all relevant and valid comments received during the review and public participation processes. Final reports must be submitted to Anchor in both Word and PDF formats.

Anchor will integrate the findings of the specialist studies into the BAR. In doing so, Anchor reserves the right to copy text directly from the specialist reports (verbatim) or to paraphrase content as required.

The Executive Summary is likely to serve as a primary source of information for inclusion in the BAR and should therefore provide a clear, accurate, and comprehensive summary of the baseline environment, impact assessment and mitigation, as well as the key findings and recommendations.

6. RESPONSES TO COMMENTS DURING THE PUBLIC PARTICIPATION PROCESS AND UPDATE OF REPORT

The specialist may be required to assist in responding to comments that are relevant to their field of expertise received during the public participation process. Adequate provision should therefore be made in the proposal for reviewing and responding to such comments.

Where necessary, the specialist will be required to revise and update the Draft Specialist Report to address relevant and substantive comments arising from the public participation process.

7. ADDITIONAL SPECIALIST STUDIES

A number of additional specialist studies are being undertaken as part of the overall assessment process. Information on these studies is provided in Table 3 below. Should engagement between specialists be required to ensure alignment of assumptions, consistency of information, and integration of findings across disciplines, Anchor must be informed. Anchor will then confirm with the relevant specialist and provide the necessary contact details to facilitate engagement. Alternatively, liaison may be coordinated through the Environmental Assessment Practitioner (EAP), Ms Cheruscha Swart. All communication with project engineers and planners must be undertaken through the EAP, Ms Cheruscha Swart.

Table 3. Additional specialist studies and specialist contact information.

Study	Specialist	Organisation
Heritage Impact Assessment	Ms Cindy Postlethwayt	Cindy Postlethwayt Heritage
Visual and Townscape Impact Assessment	Ms Claire Abrahamse	Claire Abrahamse Architecture, Urban Design, Heritage
Socio-Economic Impact Assessment	Ms Gwyn Letley	Anchor Environmental Consultants
Marine Compliance Statement	Ms Amy Wright	Anchor Environmental Consultants

8. TIMING

This should be updated as per the project schedule

Appointment	Date
Draft Impact Assessment Report completed	2 April 2026
Anchor/ client Review completed	14 April 2026
Updated draft Report completed	21 April 2026
Public Participation Process	TBC
Updated/ Final Specialist Report completed	TBC
Specialist issues Final Impact Assessment Report	TBC

It is crucial that the deadlines for submission of specialist studies are met.

9. INVOICING AND PROJECT MANAGEMENT

Invoices must be submitted via email to Cheruscha Swart (cher@anchorenvironmental.co.za), and addressed to Anchor Environmental Consultants (Pty) Ltd (admin@anchorenvironmental.co.za).

27 March 2026

Attention: Amy Wright

RE: BASIC ASSESSMENT PROCESS FOR THE 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

MARINE SPECIALIST STUDY TERMS OF REFERENCE

Anchor Environmental Consultants (Pty) Ltd has been appointed by the Victoria & Alfred Waterfront (V&AW; the Applicant/ Client) in Cape Town to undertake a Basic Assessment (BA) process to obtain Environmental Authorisation (EA) for a proposed mixed-use development located on the northeast edge of the V&A Waterfront (see Figure 1). The proposed development is described in detail in Section 1. This application is being conducted in accordance with the National Environmental Management Act, 1998 (Act No. 107 of 1998; (NEMA) and the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended). As part of the BA process, various specialist studies are required, including a Marine Impact Assessment.

As Anchor Environmental Consultants has its own in-house marine specialists, Amy Grace Wright, Senior Associate: Marine Ecosystems and Resources, was approached and appointed to conduct a marine impact assessment as part of the NEMA BA process. As part of the marine specialist's overview, she early determined that only a compliance statement is required for the proposed development, and not a full impact study.

The scope of work for the required specialist study, in support of both the BA process, is outlined in the Terms of Reference (ToR) included in this letter. The ToR are intended to guide the focus of the specialist study, rather than prescribe it in detail. In addition, not all aspects of the ToR will be applicable to every specialist. The ToR are therefore provided as a broad framework and specialists are encouraged to apply their professional judgement and experience in refining and expanding the scope where necessary and as relevant to their specific discipline, in consultation with Anchor.

Please note that your appointment will be made directly by Anchor. Any queries relating to the project scope, programme, or budget can therefore be directed to Cheruscha Swart at Anchor.

Should a site visit be required, Anchor must be notified at least two weeks in advance to allow for appropriate arrangements to be made.

Kind regards,

A handwritten signature in black ink, appearing to read 'Cheruscha Swart', with a stylized flourish extending to the right.

Cheruscha Swart

Environmental Assessment Practitioner and Senior Consultant
Anchor Environmental Consultants (Pty) Ltd

I. PROJECT DESCRIPTION

I.1 BACKGROUND

The 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 is now proposing a mixed-use development within its Breakwater Precinct, on Erven 158570 RE, 149294 RE, 177854 and 179076, situated adjacent to the Port of Cape Town and V&AW Harbour and north of the Table Bay Hotel (Figure 1). The site is currently used as an overflow parking area and container storage site.

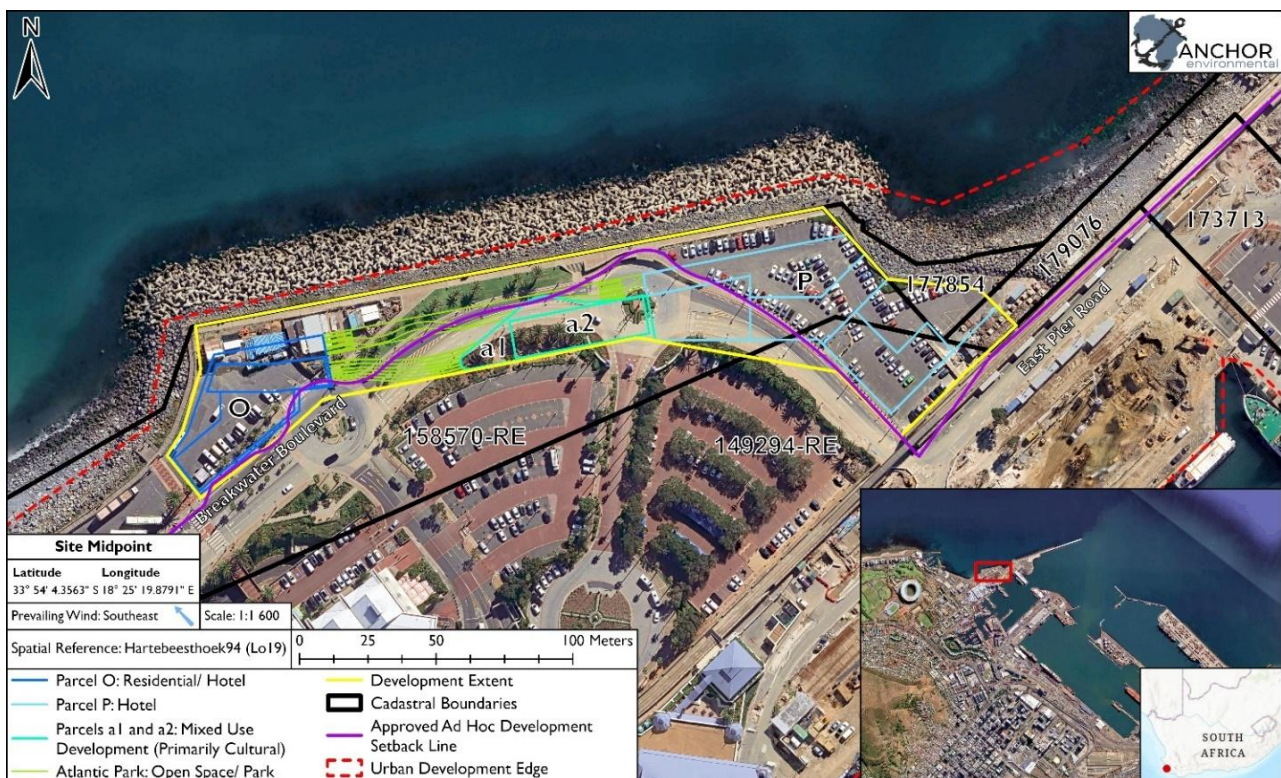


Figure 1. Location of the proposed mixed-use development on Erven 158570 RE, 149294 RE, 177854 and 179076 within the V&A Waterfront, Cape Town. The original layout and land use of the site are also visible, including existing infrastructure such as roads, parking areas, landscaped lawns with palm trees,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

The project involves the redevelopment of the site (portions of Erven 158570 RE, 149294 RE, 177854 and 179076) into a mixed-use precinct with a total development footprint of approximately 12 700 m² (1,27ha). 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 2). The proposal also includes all associated infrastructure and structures located between these components. The development will have a maximum building height of 32 m above Existing Ground Level for Parcel O. Key building dimensions and footprints are summarised in Table 1 and Table 2.

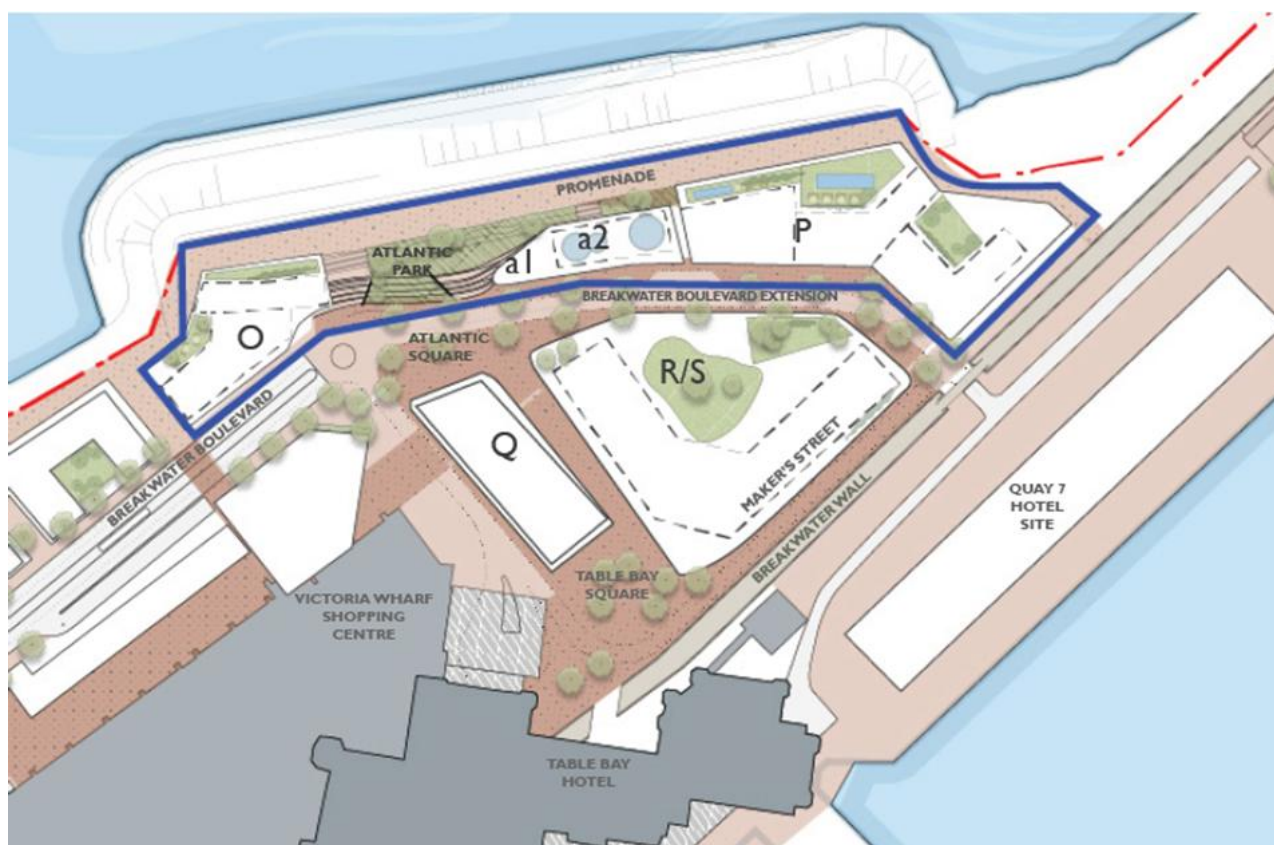


Figure 2. Proposed development layout and design for this project. This phase includes Block P, O and a1 & a2, Atlantic Park and the Promenade.

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)	Bulk/Block (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 to be utilised
158570 RE	29 338 m ²	892 m ²
149294 RE	854 442 m ²	10 000 m ²
177854	1 095 m ²	419 m ²
179076	4125 m ²	89 m ²

Parcel O: Residential/Hotel

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: 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 a specialist and educational facilities associated with the rehabilitation of turtles. 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 Square. 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, to allow for improved views of the water.

1.2 ZONING

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

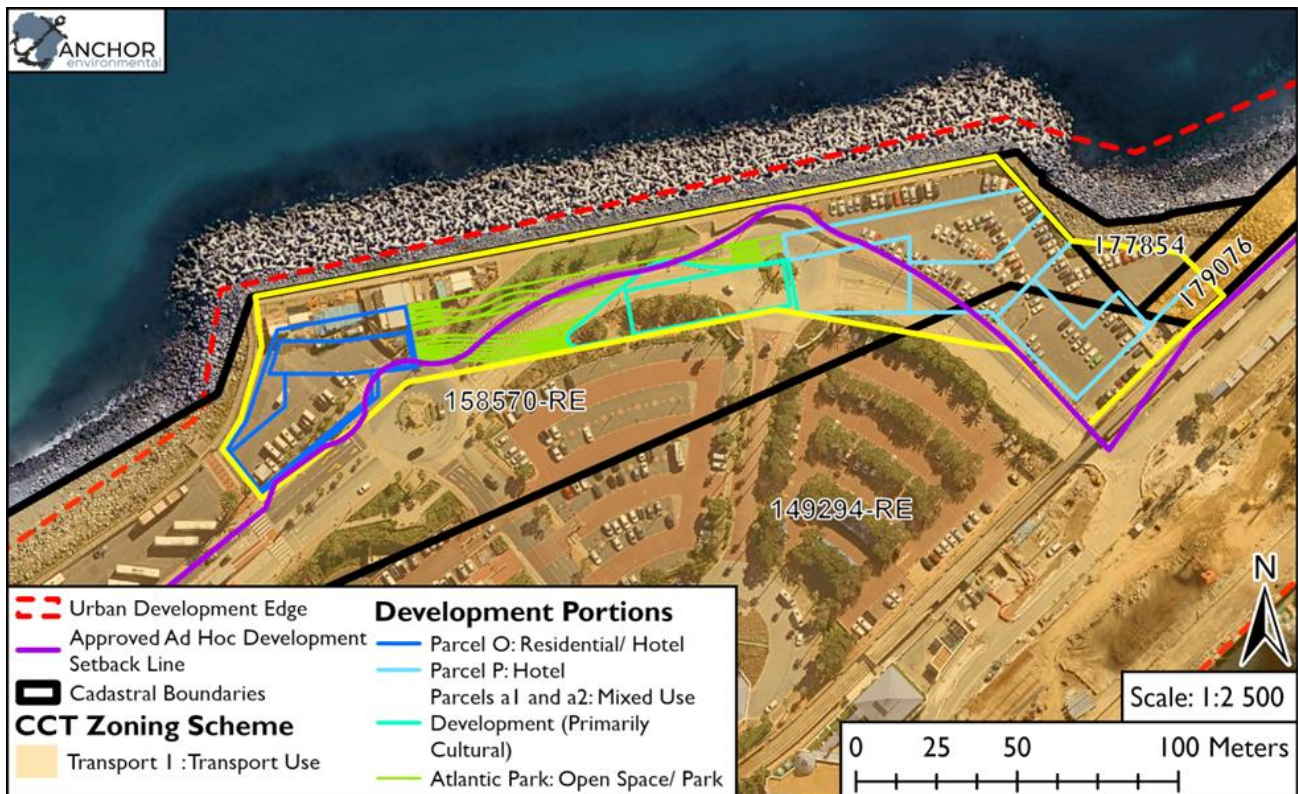


Figure 3. Land zoning for the proposed development.

1.3 SERVICES

General Pipeline Infrastructure

The proposed development will utilise existing approved bulk development rights, and therefore the CoCT is obliged to meet the service infrastructure demands of the proposed development. Existing pipeline infrastructure is located within the Breakwater Street, adjacent to the proposed site. A Capacity Letter will be submitted as an appendix with the Final Basic Assessment Report (BAR).

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 m³/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 require 39m³ /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 CoCT 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 will have an initial production capacity of produce 3,300 m³/d and will be upgradable, with minimal disruption, to 5,000 m³/d in future.

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 (a letter of confirmation will be submitted as an appendix to the BAR). The Municipal supply will be augmented with renewable energy (wind and solar). However, the approvals for these installations will only be applied for as individual buildings are required.

1.4 ALTERNATIVES

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.

Alternative building designs have, however, been explored. Details of these can be provided to the specialist for consideration and assessment, should this be required.

1.5 ENVIRONMENTAL AUTHORISATION PROCESS

In terms of the EIA Regulations, certain activities, known as Listed Activities and published in Listing Notices (LN) 1, 2 and 3, may result in environmental, socio-economic or cultural heritage impacts and therefore require assessment and EA from the competent authority, in this case the DEA&DP, prior to commencement. Activities listed under LN 1 and LN 3 typically relate to smaller-scale developments and require assessment through a BA process. As the proposed development triggers activities under LN 1, EA must be obtained through a BA process. The BA process entails the assessment of potential environmental impacts associated with the proposed development. This includes desktop studies, the appointment of relevant specialists to undertake specialist assessments, and the compilation of findings into a BAR. The BAR is made available to interested and affected parties for review and comment as part of the public participation process. All comments received are compiled into a Comments and Response Report (CRR) and are considered in the updating of the BAR, where applicable, prior to submission of the final BAR and CRR to DEA&DP for decision-making on the EA application.

Anchor has therefore been appointed as the Environmental Assessment Practitioner (EAP) to coordinate the required specialist studies and to manage and facilitate the BA process.

2. SCREENING TOOL & SITE SENSITIVITY VERIFICATION (SSV) OUTCOME

The Department of Forestry, Fisheries and Environment (DFFE) Screening Tool identified the need for a Marine Impact Assessment. Even though the DFFE Screening Tool provided no impact rating for the theme, it is believed the reason for the need for a study is due to the proximity of the development to the marine environment. The proposed development site is located on reclaimed land, which is located adjacent to the Port of Cape Town, and, as according to NFEPA 2011, is located within a NFEPA Estuary. The recommendation is therefore considered accurate, and the EAP agrees that a Marine Compliance Statement is warranted.

3. OVERVIEW OF THE TERMS OF REFERENCE AND REQUIREMENTS FOR SPECIALIST STUDIES

- The appointed Consultant is required to undertake the specialist investigation and compile a report in accordance with the Scope of Work (SoW) and ToR provided in this document.
- The specialist report must be prepared in line with applicable legal, policy, and procedural requirements, particularly in relation to assessment methodologies and reporting standards. This includes, but is not limited to:
 - NEMA; Act 107 of 1998, ensuring alignment with the EIA Regulations and that the report is suitable as a standalone specialist report within the EIA process;
 - Integrated Coastal Management Act (ICMA) Act 24 of 2008;
 - The requirements for specialist reports as set out in Appendix 6 of the EIA Regulations (General Gazetted Requirements);
 - DEA&DP guideline for involving marine specialists in EIA processes (2005), where applicable;
 - DEAT (2006) Guideline 5: Assessment of Alternatives and Impacts in support of the Environmental Impact Assessment Regulations, 2006. Integrated Environmental Management Guideline Series, Department of Environmental Affairs and Tourism (DEAT), Pretoria; and
 - Any other applicable legislation, regulations, or guidance documents.

Minimum Requirements for the Specialist Study and Report:

The specialist study must address the following:

- Describe the current environmental baseline relevant to the specialist field;
- Identify and evaluate potential impacts (both positive and negative) associated with the proposed development, applying the prescribed impact assessment methodology (refer to the end of the document);
- Propose appropriate mitigation measures / actions to manage negative impacts and, where possible, enhance positive outcomes;
- Recommend monitoring requirements, where relevant, to verify the implementation and effectiveness of mitigation measures;
- Assess the environmental acceptability of any considered alternatives and identify a preferred alternative, where applicable;
- Provide a substantiated professional opinion on the acceptability of the proposed development within the context of the specialist discipline;
- Highlight any conditions that should be attached to potential authorisation;
- Clearly state any assumptions, limitations, and uncertainties associated with the assessment;
- Identify any additional work or investigations that may be required;
- Respond to issues relevant to the specialist discipline that arise during the public participation process; and
- Present the above in a structured specialist report that complies with the relevant regulatory requirements.

4. DETAILED SPECIALIST STUDY TERMS OF REFERENCE AND REPORT CONTENT

Specialists are required to consider the following requirements during the preparation and compilation of the specialist report:

- The specialist report is intended for use by stakeholders, members of the public and authorities. It must therefore be written in a clear and accessible manner, with technical terminology minimised where possible. Where technical terms are necessary, these must be explained in a dedicated glossary.
- All figures, maps, and spatial outputs must be of high resolution and suitable for inclusion in the Basic Assessment Report, where required.
- The report must align with and be informed by the requirements outlined in Section 3.
- As a minimum, the specialist study and report must include the following components:

1.6 EXECUTIVE SUMMARY

The Executive Summary should briefly outline the purpose and context of the assessment and provide a short description of the proposed development. It must present an accurate, clear, and comprehensive summary of the baseline environment, impact assessment (including a summary table of identified impacts) and mitigation measures, as well as clearly set out the key findings, conclusions, and recommendations of the study. The summary must be written in a manner that is readily understandable to non-specialists and must avoid detailed technical discussion and jargon.

The Executive Summary is likely to serve as a primary source of information for inclusion in the BAR and should therefore provide a clear, accurate, and comprehensive summary of the content of the report.

1.7 DECLARATION BY SPECIALIST

The report must include a signed declaration by the specialist in the format required by the Competent Authority. This template will be provided by the EAP. Depending on the requirements of the Competent Authority, the declaration may need to be signed in the presence of a Commissioner of Oaths.

1.8 SPECIALIST EXPERTISE

This section must provide a summary of the specialist's qualifications, professional registrations, relevant experience, and area of expertise as it relates to the study. A full Curriculum Vitae must be included in the appendices, along with copies of relevant qualifications and professional registration certificates (certified if required).

1.9 ACRONYMS/ ABBREVIATIONS

A list of all acronyms and abbreviations used throughout the report must be provided to ensure clarity and ease of reference.

1.10 GLOSSARY (IF APPLICABLE)

Where technical terminology is used, a glossary must be included defining key terms used within the specialist report

1.11 INTRODUCTION

The introduction must provide the background to the project and clearly explain the purpose and scope of the specialist study. It should briefly describe the proposed development, including its key components. The study area must also be described, with clear indication of the spatial extent relevant to the assessment. The section must be supported by appropriate maps clearly illustrating the study area.

1.12 LEGISLATIVE REVIEW

This section must identify and briefly describe all legislation, policies, guidelines, and regulatory requirements relevant to the specialist discipline and the proposed development. It must further explain how the development responds to and complies with these requirements.

1.13 ASSUMPTIONS AND LIMITATIONS

All assumptions, limitations, data gaps, and uncertainties associated with the assessment must be clearly stated. This includes any constraints that may have influenced the scope, accuracy, or interpretation of the findings.

1.14 METHODOLOGY/ APPROACH TO THE STUDY

This section must describe the overall approach adopted for the study, including the methods used to collect, analyse, and interpret baseline data. Information sources must be identified, and the appropriateness of the methodologies applied must be briefly justified. Where relevant, the knowledge of local communities or stakeholders should be incorporated. The assessment should primarily be based on accepted scientific methods; however, where data is limited, professional judgement and experience must be applied and clearly stated. The ToR for the specialist study must also be included in this section or referenced appropriately.

1.15 DESCRIPTION OF THE AFFECTED ENVIRONMENT (BASELINE DESCRIPTION)

The specialist must provide a comprehensive description of the existing conditions within the study area, relevant to their field of expertise (i.e., environmental, social, economic, etc.). This must include both site-specific conditions and the broader surrounding environment to ensure appropriate contextual understanding.

The baseline description must incorporate data obtained through desktop review and field surveys, where applicable. The adequacy of any existing baseline information must be assessed, and updated where necessary if it materially affects the outcomes of the study.

The uniqueness and irreplaceability of the site must be considered within a broader local, regional, and where relevant, national context. This should be informed by comparison with available datasets and existing scientific information.

The specialist must also provide an assessment of environmental sensitivity. In this context, sensitivity refers to the capacity of the environment to absorb or withstand disturbance, taking cumulative impacts into account. Environments with low resilience, where small disturbances may result in significant or irreversible change, should be identified as highly sensitive. Conversely, environments that can accommodate higher levels of disturbance without significant degradation may be considered less sensitive.

1.16 IMPACT IDENTIFICATION AND ASSESSMENT

1.16.1 DETERMINATION OF IMPACTS

1. Direct impacts

Potential impacts (both positive and negative) associated with the proposed development should be identified, described, and assessed in terms of their significance, using the methodology outlined below. The impact should be re-assessed after assuming that effective mitigation measures have been implemented.

Impacts should also be classified as either direct or indirect:

- **Direct impacts** refer to the immediate impacts associated with the development and its activities. These relate to the physical footprint of the project and direct interactions with the receiving environment.
- **Indirect impacts** refer to secondary or induced impacts that occur as a consequence of the development and are typically removed in time or space from the initial activity. These impacts are not caused directly by the project itself, but rather through an intervening process or chain of events. For example, the establishment of new access roads for a development may lead to increased informal settlement or resource harvesting in previously undisturbed areas, resulting in additional environmental degradation. These could be described qualitatively if necessary.

2. Assessment of Alternatives

Impacts associated with any identified alternatives considered as part of the EIA process must also be assessed using the methodology outlined below.

4. Cumulative impacts

Potential cumulative impacts (both positive and negative) associated with the proposed development (preferred alternative only) should be identified, described, and assessed. This assessment should recognise that cumulative impacts occur when:

- Multiple impacts from a single activity, or from different activities, affect the natural or social environment with such frequency over time or intensity in space that the environment is unable to absorb or recover from them; or
- Impacts from one activity interact with those of the same or other activities in a combined or synergistic manner, resulting in greater overall effects than when considered individually.
- They consider the additional contribution of the proposed development to the combined impacts of past, present, and reasonably foreseeable future activities.

The cumulative impact assessment will generally be qualitative and descriptive in nature. Where appropriate, the methodology outlined below can be applied.

Project Phases for the Impact Assessment

For the above assessments, impacts should be divided into the following phases:

- **Construction phase**, referring to impacts arising from the construction of the development and all associated infrastructure;

- **Operational phase**, referring to impacts occurring during the post-construction operation of the development; and
- **Decommissioning phase** (if applicable), referring to impacts associated with the cessation of operations, dismantling of infrastructure, and rehabilitation of the site.

‘No-Go’ / Do Nothing alternative

Impacts (both positive and negative) of the ‘No-Go’ or Do-Nothing alternative must also be identified, described, and assessed using the methodology outlined below.

1.16.2 CONSTRAINTS AND NO-GO AREAS

The impact assessment must also identify any constraints that may critically affect the development’s feasibility. This includes highlighting any fatal flaws, defined as significant adverse impacts that cannot be effectively mitigated and that would render the project or specific components thereof unacceptable within a particular area. Any areas that should be avoided (no-go areas) must be clearly identified and justified. Where a fatal flaw is identified, this must be explicitly stated, together with a clear explanation of the implications for the project.

1.16.3 MITIGATION/ OPTIMISATION MEASURES AND IMPACT MANAGEMENT ACTIONS AND OUTCOMES

Mitigation measures refer to practical actions designed to reduce negative impacts, while optimisation measures are intended to enhance positive impacts/ beneficial outcomes. Specialists must identify and describe practical mitigation and optimisation measures that can be implemented to reduce the significance of negative impacts and/or enhance positive impacts effectively.

Where applicable, specialists must also recommend suitable monitoring and review measures or programmes to ensure the proper implementation of mitigation measures and to assess their ongoing effectiveness.

The mitigation measures recommended by specialists form the foundation for management actions in the Environmental Management Programme (EMPr). An EMPr is required for any project subjected to an EIA and serves as a proactive management tool to guide consistent and ongoing environmental management throughout the life cycle of a development. Its purpose is to prevent or minimise negative impacts while enhancing positive benefits.

The EMPr, however, adopts an outcome-based approach, setting out management actions designed to achieve defined environmental outcomes. In general, mitigation measures represent the ‘what’, the specific recommendations to avoid, reduce, or manage potential environmental impacts, while the actions in the EMPr describe the ‘how’, the specific steps, procedures, and responsibilities required to implement and monitor those measures.

To ensure that mitigation measures are effectively translated into EMPr actions, specialists should develop mitigation measures with an outcome-based approach in mind. These actions or measures should therefore not only reduce the significance of impacts, but also contribute to achieving a clearly defined desired outcome. The outcome/s should be clearly indicated for each impact (see Step 6 in the Impact Assessment Methodology).

In many cases, a single overarching impact management outcome may apply to multiple impacts and may in some instances be applicable across all impacts assessed within a specialist report.

While impacts are assessed for the construction, operational, and decommissioning phases, in some instances impact management outcomes and actions (mitigation measures) may also be identified for the pre-construction or design phase.

Mitigation and optimisation measures must be classified as either:

- **Essential:** These are mandatory for implementation and are non-negotiable. These measures are assumed to be implemented in the “with mitigation” impact scenario and are therefore incorporated into the final assessment of impact significance.
- **Best Practice / Recommended:** These are optional but should be considered for implementation where feasible. These are considered desirable enhancements. However, their non-implementation will not alter the impact rating. In such cases, the applicant must provide a clear and defensible justification for not adopting these measures.

Refer to Step 6 in the Impact Assessment Methodology.

1.17 ENVIRONMENTAL ACCEPTABILITY AND COMPARISON OF ALTERNATIVES

The specialist must evaluate the environmental acceptability of each identified alternative by considering whether the associated impacts are acceptable within the context of the receiving environment. Based on this assessment, the specialist must identify the environmentally preferred alternative and provide a clear, reasoned motivation for this selection, taking into account the comparative significance of impacts and the effectiveness of proposed mitigation measures.

1.18 CONCLUSIONS AND RECOMMENDATIONS

This section must provide a concise synthesis of the key findings of the specialist study, including a summary of the identified impacts and any significant issues of concern. It must indicate the environmental suitability or unsuitability of the assessed alternatives and confirm the preferred alternative, where applicable.

A clear, reasoned opinion must be provided on whether the proposed development should be authorised from the perspective of the specialist discipline. This must be supported by the key mitigation measures required to achieve acceptability, and any recommended conditions of approval must be clearly specified.

The section must also outline any recommended further work, where justified, and indicate an appropriate way forward. Recommendations for additional studies must be well substantiated and limited to those that are necessary.

1.19 REFERENCES

All information sources consulted during the study must be properly cited and listed in this section. While no specific referencing format is prescribed, a consistent and recognised referencing style should be applied throughout.

5. REPORT SUBMISSION AND REVIEW

Draft Specialist Reports, incorporating all required components outlined above, must be submitted electronically to Anchor for review by Anchor and the Client. Draft reports must be provided in Word format to enable review and commenting using track changes. Specialists are encouraged to submit complete and well-developed draft reports to minimise the need for multiple review iterations. Thereafter, specialists must revise their reports accordingly.

The revised Draft Specialist Report will be made available as part of the EIA public participation process. Following this, further updates may be required to address comments received and to finalise the report (see Section 6 below). The Final Specialist Report must incorporate all relevant and valid comments received during the review and public participation processes. Final reports must be submitted to Anchor in both Word and PDF formats.

Anchor will integrate the findings of the specialist studies into the BAR. In doing so, Anchor reserves the right to copy text directly from the specialist reports (verbatim) or to paraphrase content as required.

The Executive Summary is likely to serve as a primary source of information for inclusion in the BAR and should therefore provide a clear, accurate, and comprehensive summary of the baseline environment, impact assessment and mitigation, as well as the key findings and recommendations.

6. RESPONSES TO COMMENTS DURING THE PUBLIC PARTICIPATION PROCESS AND UPDATE OF REPORT

The specialist may be required to assist in responding to comments that are relevant to their field of expertise received during the public participation process. Adequate provision should therefore be made in the proposal for reviewing and responding to such comments.

Where necessary, the specialist will be required to revise and update the Draft Specialist Report to address relevant and substantive comments arising from the public participation process.

7. ADDITIONAL SPECIALIST STUDIES

A number of additional specialist studies are being undertaken as part of the overall assessment process. Information on these studies is provided in Table 3 below. Should engagement between specialists be required to ensure alignment of assumptions, consistency of information, and integration of findings across disciplines, Anchor must be informed. Anchor will then confirm with the relevant specialist and provide the necessary contact details to facilitate engagement. Alternatively, liaison may be coordinated through the Environmental Assessment Practitioner (EAP), Ms Cheruscha Swart. All communication with project engineers and planners must be undertaken through the EAP, Ms Cheruscha Swart.

Table 3. Additional specialist studies and specialist contact information.

Study	Specialist	Organisation
Heritage Impact Assessment	Ms Cindy Postlethwayt	Cindy Postlethwayt Heritage
Visual and Townscape Impact Assessment	Ms Claire Abrahamse	Claire Abrahamse Architecture, Urban Design, Heritage
Socio-Economic Impact Assessment	Ms Gwyn Letley	Anchor Environmental Consultants
Marine Compliance Statement	Ms Amy Wright	Anchor Environmental Consultants

8. TIMING

This should be updated as per the project schedule

Appointment	Date
Draft Impact Assessment Report completed	2 April 2026
Anchor/ client Review completed	14 April 2026
Updated draft Report completed	21 April 2026
Public Participation Process	TBC
Updated/ Final Specialist Report completed	TBC
Specialist issues Final Impact Assessment Report	TBC

It is crucial that the deadlines for submission of specialist studies are met.

9. INVOICING AND PROJECT MANAGEMENT

Invoices must be submitted via email to Cheruscha Swart (cher@anchorenvironmental.co.za), and addressed to Anchor Environmental Consultants (Pty) Ltd (admin@anchorenvironmental.co.za).

IMPACT ASSESSMENT METHODOLOGY

The impact assessment methodology set out below is applied to all potential positive and negative direct impacts associated with the construction, operational, and decommissioning phases of the proposed project, as well as cumulative impacts and the no-go alternative. Indirect impacts are only considered where relevant and can be assessed qualitatively or using the formal impact assessment methodology described below.

The significance of all potential impacts that would result from the proposed project is determined in order to assist decision-makers. The significance of an impact is defined as a combination of the consequence of the impact occurring and the probability that the impact will occur. The significance of each identified impact must therefore be rated according to the methodology set out below:

Step 1: Consequence Rating

Determine the consequence rating for the impact by determining the score for each of the three criteria (A-C) listed below and then adding them. The rationale for assigning a specific rating, and comments on the degree to which the impact may cause irreplaceable loss of resources and be irreversible, must be included in the narrative accompanying the impact rating:

Rating	Definition of Rating	Score
A. Extent – the area over which the impact will be experienced.		
Local	Confined to project or study area or part thereof (e.g. limits of the concession area)	1
Regional	The region (e.g. the whole of Namaqualand coast)	2
(Inter) national	Significantly beyond Saldanha Bay and adjacent land areas	3
B. Intensity – the magnitude of the impact in relation to the sensitivity of the receiving environment, taking into account the degree to which the impact may cause irreplaceable loss of resources.		
Low	Site-specific and wider natural and/or social functions and processes are negligibly altered	1
Medium	Site-specific and wider natural and/or social functions and processes continue albeit in a modified way	2
High	Site-specific and wider natural and/or social functions or processes are severely altered	3
C. Duration – the time frame for which the impact will be experienced. Also state its degree of reversibility.		
Short-term	Up to 2 years	1
Medium-term	2 to 15 years	2
Long-term	More than 15 years (state whether impact is irreversible)	3

The combined score of these three criteria corresponds to a Consequence Rating, as follows:

Combined Score (A+B+C)	3 – 4	5	6	7	8 – 9
Consequence Rating	Very low	Low	Medium	High	Very high

Step 2: Probability

Assess the probability of the impact occurring according to the following definitions:

Probability – the likelihood of the impact occurring	
Improbable	< 40% chance of occurring
Possible	40% - 70% chance of occurring
Probable	> 70% - 90% chance of occurring
Definite	> 90% chance of occurring

Step 3: Impact Significance

Determine the overall significance of the impact as a combination of the consequence and probability ratings, as set out below:

CONSEQUENCE	PROBABILITY				
		Improbable	Possible	Probable	Definite
	Very Low (3-4)	INSIGNIFICANT	INSIGNIFICANT	VERY LOW	VERY LOW
	Low (5)	VERY LOW	VERY LOW	LOW	LOW
	Medium (6)	LOW	LOW	MEDIUM	MEDIUM
	High (7)	MEDIUM	MEDIUM	HIGH	HIGH
	Very High (8-9)	HIGH	HIGH	VERY HIGH	VERY HIGH

The significance rating of impacts is considered by decision-makers, as shown below. Note, this method does not apply to minor impacts which can be logically grouped into a single assessment.

INSIGNIFICANT: the potential impact is negligible and will not have an influence on the decision regarding the proposed activity.

VERY LOW: the potential impact is very small and should not have any meaningful influence on the decision regarding the proposed activity.

LOW: the potential impact may not have any meaningful influence on the decision regarding the proposed activity.

MEDIUM: the potential impact should influence the decision regarding the proposed activity.

HIGH: the potential impact will affect a decision regarding the proposed activity.

VERY HIGH: For negative impacts, the proposed activity should only be approved under special circumstances. For positive impacts, the proposed activity should strongly be considered for approval.

Step 4: Status of Impact

Note the status of the impact (i.e. will the effect of the impact be negative or positive?). Note it as “-ve” or “+ve” in the table.

Please use the following colour scheme to indicate the “**Significance**” of negative and positive impacts in the impact tables.

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

Step 5: Confidence Rating

State the level of confidence in the assessment of the impact (high, medium or low). Depending on the data available, a higher level of confidence may be attached to the assessment of some impacts than others. For example, if the assessment is based on extrapolated data, this may reduce the confidence level to low, noting that further ground-truthing is required to improve this.

Step 6: Mitigation and Optimisation Measures

Identify and describe practical mitigation and optimisation measures that can be implemented effectively to reduce or enhance the significance of the impact and achieve the management outcome.

Mitigation / impact management measures for reducing negative impacts must be 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.

Mitigation and optimisation measures must be inserted into the completed impact assessment table, with an indication on whether they are Essential or Recommended. The impact should be re-assessed with mitigation/ optimisation, by following Steps 1-5 again to demonstrate how the extent, intensity, duration and/or probability change after implementation of the proposed mitigation measures.

Step 7: Impact management outcomes

Next, also specify the desired **impact management outcome** that these measures aim to achieve.

To ensure that mitigation measures are effectively translated into EMPr actions, specialists should develop mitigation/ optimisation measures with an outcome-based approach in mind. These actions or measures should therefore not only reduce the significance of impacts, but also contribute to achieving a clearly defined desired outcome. The outcome/s should be clearly indicated for each impact.

In many cases, a single overarching impact management outcome may apply to multiple impacts and may in some instances be applicable across all impacts assessed within a specialist report.

Step 8: Impact Assessment Description and Table

1. **Describe the impact** being assessed.
2. **Explain how the significance ratings were determined by motivating the ratings assigned before mitigation** (Steps 1 to 5), explaining why the impact was assigned the selected extent, intensity, duration, probability, and confidence rating.
3. Briefly state the reversibility of the impact and the degree to which it can be avoided, managed, and mitigated.
4. Describe the mitigation/ optimisation measures.
5. **Motivate the ratings assigned after mitigation**, explaining how implementation of the mitigation measures changes the impact ratings and significance (e.g. why the extent reduces from Regional to Local, the intensity from Medium to Low, while the duration remains Long-term, etc.).
6. State the **Desired Impact Management Outcome**.

Example 1: Negative Impact

Table 1: Impact.

	Extent	Intensity	Duration	Consequence	Probability	Significance	Status	Confidence
Without mitigation	Regional 2	Medium 2	Long-term 3 (Reversible/ Irreversible/ Some Reversibility)	High 7	Probable	HIGH	-‘ve	High
Essential mitigation measures/ Recommended mitigation measures								
With mitigation	Local 1	Low 1	Long-term 3	Low 5	Improbable	VERY LOW	- ve	High

Desired Impact Management Outcome to be achieved: xxx

Example 2: Positive Impact

Description of impact and motivation for ratings before and after optimisation measures.

Table 1: Impact.

	Extent	Intensity	Duration	Consequence	Probability	Significance	Status	Confidence
Without optimisation measures	Regional	Medium	Short term	Medium	Probable	MEDIUM	Positive	Med-High
Optimisation measures: • xxx. • xxxxx								
With optimisation measures	Regional	Medium to High	Short term	High	Probable	HIGH	Positive	Med-High

Desired Impact Management Outcome to be achieved: xxx

Example 2: Insignificant Impact and no mitigation required.

Description of impact and motivation for ratings.

Table 1: Impact.

	Extent	Intensity	Duration	Consequence	Probability	Significance	Status	Confidence
Without mitigation	Regional 2	Low 1	Medium term 2	Very low 4	Improbable	INSIGNIFICANT	-ve	High
Mitigation measures: • Not considered to be necessary due to low significance.								

Desired Impact Management Outcome to be achieved: xxx