

# **APPENDIX L – SITE SENSITIVITY VERIFICATION REPORT (SSVR)**

## **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](http://www.anchorenvironmental.co.za)



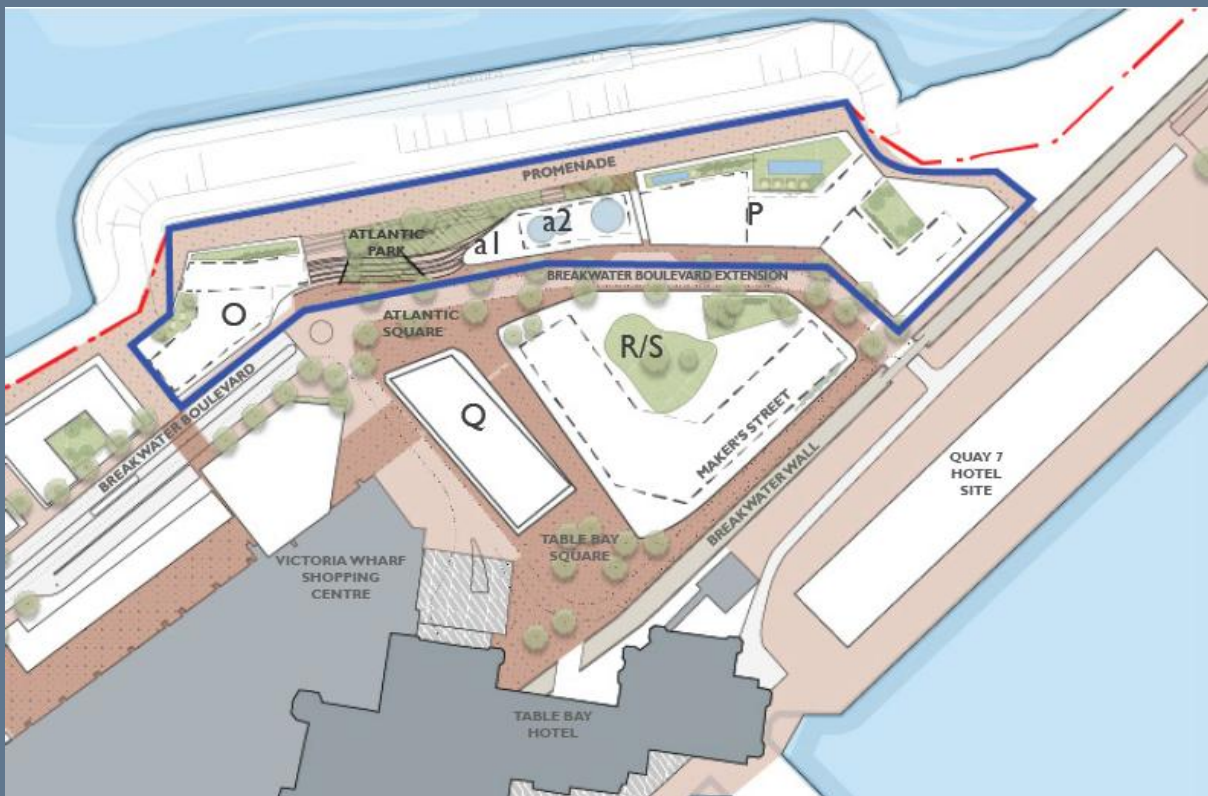
© Anchor Environmental Consultants 2026

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



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

## SITE SENSITIVITY VERIFICATION REPORT



10 April 2026



**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**

**SITE SENSITIVITY VERIFICATION REPORT**

**10 April 2026**

Report prepared for:

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

PO Box 50001

Waterfront

8002



by:

**Anchor Environmental Consultants (Pty) Ltd**

8 Steenberg House, Silverwood Close, Tokai, South Africa

[www.anchorenvironmental.co.za](http://www.anchorenvironmental.co.za)



Citation: Swart C and Armitage M. 2026. Basic Assessment for a 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: Site Sensitivity Verification Report. Specialist Report no. 2251/1, prepared by Anchor Environmental Consultants (Pty) Ltd for V&A Waterfront Holdings (Pty) Ltd. 31 pp.

© Anchor Environmental Consultants 2026

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

# TABLE OF CONTENTS

---

|                                                                                           |           |
|-------------------------------------------------------------------------------------------|-----------|
| <b>TABLE OF CONTENTS.....</b>                                                             | <b>I</b>  |
| <b>I INTRODUCTION .....</b>                                                               | <b>I</b>  |
| 1.1 BRIEF PROJECT OVERVIEW .....                                                          | 1         |
| 1.2 PERMITTING REQUIREMENTS .....                                                         | 3         |
| 1.3 PURPOSE OF THIS REPORT.....                                                           | 4         |
| <b>2 BACKGROUND AND QUALIFICATIONS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER .....</b> | <b>5</b>  |
| <b>3 SITE SENSITIVITY VERIFICATION PROCESS .....</b>                                      | <b>6</b>  |
| 3.1 SITE SENSITIVITY VERIFICATION PROTOCOL .....                                          | 6         |
| 3.1 SITE SENSITIVITY VERIFICATION METHODOLOGY.....                                        | 7         |
| <b>4 SITE SENSITIVITY VERIFICATION FINDINGS .....</b>                                     | <b>8</b>  |
| 4.1 SCREENING TOOL RESULTS .....                                                          | 8         |
| 4.2 DESKTOP REVIEW.....                                                                   | 9         |
| 4.2.1 <i>Municipal Land Zoning And Land-Use</i> .....                                     | 9         |
| 4.2.2 <i>Biodiversity Spatial Planning Considerations</i> .....                           | 10        |
| 4.1 SITE ASSESSMENT .....                                                                 | 15        |
| 4.1.1 <i>Current land-use and condition of the site</i> .....                             | 15        |
| 4.1.2 <i>Terrestrial Biodiversity</i> .....                                               | 20        |
| 4.1.3 <i>Coastal and Marine Environment</i> .....                                         | 20        |
| <b>5 SITE SENSITIVITY VERIFICATION RESULTS .....</b>                                      | <b>23</b> |
| 5.1 ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME .....                                      | 23        |
| 5.2 PALAEOLOGY THEME.....                                                                 | 23        |
| 5.3 LANDSCAPE/VISUAL ASSESSMENT.....                                                      | 24        |
| 5.4 SOCIO-ECONOMIC ASSESSMENT.....                                                        | 24        |
| 5.5 MARINE ECOLOGY IMPACT ASSESSMENT .....                                                | 25        |
| 5.6 CIVIL AVIATION THEME.....                                                             | 25        |
| 5.7 ANIMAL SPECIES THEME.....                                                             | 26        |
| 5.8 PLANT SPECIES THEME.....                                                              | 27        |
| 5.9 TERRESTRIAL BIODIVERSITY THEME.....                                                   | 27        |
| 5.10 AQUATIC BIODIVERSITY THEME.....                                                      | 27        |
| 5.11 RELATIVE DEFENCE THEME .....                                                         | 28        |
| 5.12 AVIAN .....                                                                          | 28        |
| 5.13 GEOTECHNICAL .....                                                                   | 28        |
| <b>6 CONCLUSION .....</b>                                                                 | <b>29</b> |
| <b>7 REFERENCES .....</b>                                                                 | <b>31</b> |



# I INTRODUCTION

## I.1 BRIEF PROJECT OVERVIEW

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

The V&A Waterfront (V&AW—the proponent) is now proposing a mixed-use development within its Breakwater Precinct, on Erven 158570 RE, 149294 RE, 177854 and 179076, situated north of the Table Bay Hotel (See Figure I.1, below).

The site earmarked for redeveloped is currently used as an overflow parking area and container storage site. The project involves the redevelopment of the site into a mixed-use precinct with a total development footprint of approximately 12 700 m<sup>2</sup> (1,27ha). It will comprise three primary development parcels, namely Parcels O, P and a1 & a2, as well as the expansion of the existing promenade and the creation of a new public open space, Atlantic Park. The proposal also includes all associated infrastructure and structures located between these components (see Figure I.2).



Figure I.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.

Together, the three parcels have an approximate Gross Building Area (GBA; the sum of all building/ floor areas within all buildings, as measured from the outside of all exterior walls) of 28 430m<sup>2</sup>, while a maximum bulk (the sum of the gross horizontal areas of all buildings, as measured from the interior face of exterior walls) of  $\pm 19\,800\text{ m}^2$  is envisaged for the development. The maximum building height will be 32 m above Existing Ground Level (EGL) for Parcel O. Project Parcel O will have a building footprint of  $\pm 1\,750\text{ m}^2$ , and Parcel P of  $\pm 4200\text{m}^2$ , both to be developed for mixed use purposes (hotel and /or residential and associated uses). Project Parcels a1 & a2 will be developed as a cultural and park area and will have a building footprint of  $\pm 1\,200\text{m}^2$ .

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

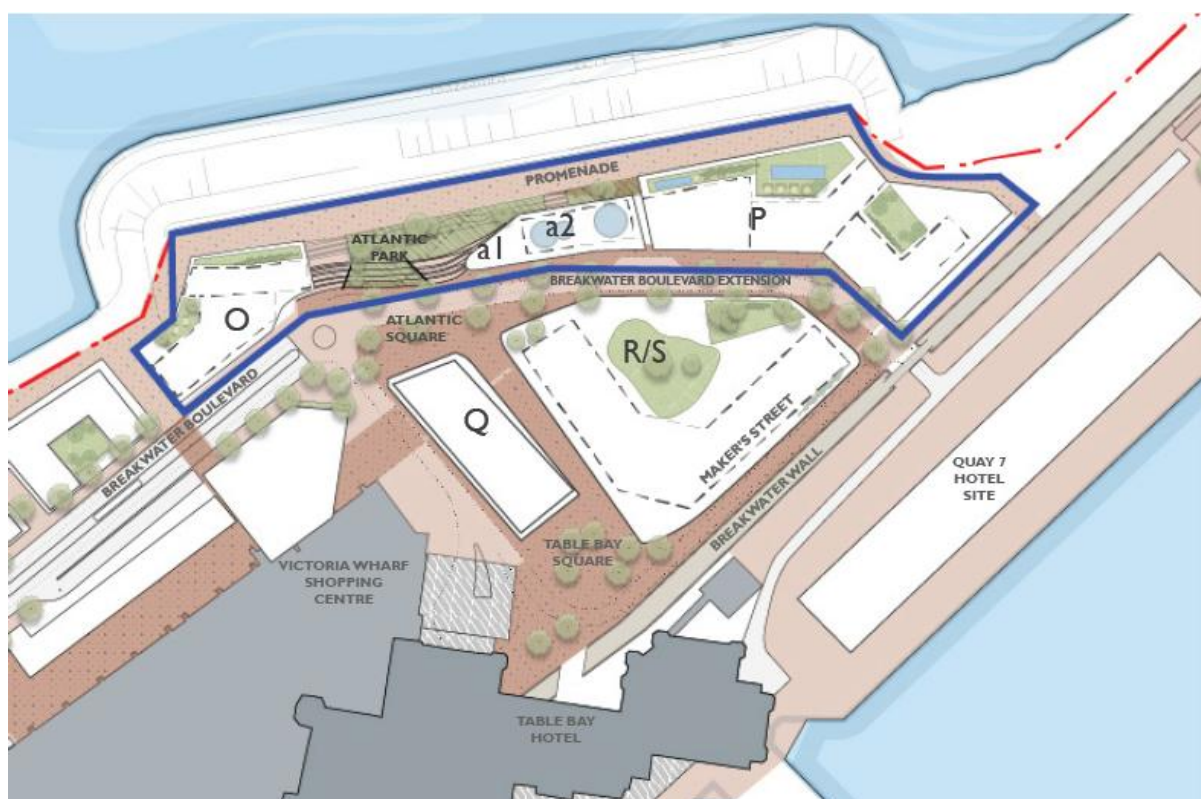


Figure 1.2. Proposed development layout and design for Phase GB01B. This phase includes Block P, O and a1 & a2.

Table 1.1 Land use and building information for the different land parcels/ blocks forming part of Phase GB01B.

| Building Block     | Max Height from Existing Ground Level | Building Footprint (m <sup>2</sup> ) | Land Use                                      | Gross Building Area (Gba) /Block (m <sup>2</sup> ) | Bulk/Block (m <sup>2</sup> ) |
|--------------------|---------------------------------------|--------------------------------------|-----------------------------------------------|----------------------------------------------------|------------------------------|
| <b>Block P</b>     | +21m                                  | 4200                                 | Mixed Use:<br>Primarily Hotel/<br>Residential | 14 270                                             | 9400                         |
| <b>a1 &amp; a2</b> | a1 — +10m<br>a2 — +17 m               | 1200                                 | Mixed Use:<br>Primarily Cultural              | 4 200                                              | 3 400                        |

| Building Block | Max Height from Existing Ground Level | Building Footprint (m <sup>2</sup> ) | Land Use                                      | Gross Building Area (Gba) /Block (m <sup>2</sup> ) | Bulk/Block (m <sup>2</sup> ) |
|----------------|---------------------------------------|--------------------------------------|-----------------------------------------------|----------------------------------------------------|------------------------------|
| <b>Block O</b> | +32m                                  | 1750                                 | Mixed Use:<br>Primarily<br>Residential /Hotel | 10 000                                             | 7 000                        |

### **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 to 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.

### **Parcels a1 & a2: Mixed Use (Primarily Cultural)**

Parcels a1 & a2 are relatively small parcels and will likely accommodate a mixed-use of primarily cultural and specialist/ educational facilities associated with the rehabilitation of turtles. The upper levels of the a2 portion could include restaurant, hotel or residential facilities and 1500m<sup>2</sup> for a park area.

### **Atlantic Park: Open Space/Park**

The park is proposed at a key junction of the Promenade end, Breakwater Boulevard, Victoria Wharf Shopping Centre and the pedestrian link between Table Bay Square and 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 an accessible space for the public to enjoy and complements the surrounding V&A buildings in the precinct. As a public space, Atlantic Park, together with a widened (nine metres) Promenade, will provide for improved vistas to the water.

## **1.2 PERMITTING REQUIREMENTS**

According to the Environmental Impact Assessment (EIA) regulations of 2014, as amended, (EIA Regs, 2014) promulgated in terms of the National Environmental Management Act (NEMA; Act 107 of 1998), certain activities that may result in environmental, socio-economic or cultural heritage impacts must be identified and assessed before commencement. These activities, known as “Listed Activities”, are outlined in Listing Notice (LN) 1, LN 2 and as LN 3, as published under the EIA Regs, and require Environmental Authorisation (EA) from the Competent Authority (CA), in this case, the Department of Environmental Affairs and Development Planning (DEA&DP), before proceeding.

Activities listed under LN 1 and LN 3 typically involve smaller-scale developments and which are expected to have easily controllable impacts. These activities require assessment and application for EA, through a Basic Assessment (BA) process. It was determined that the proposed development triggers the following listed activities under LN 1:

- **Activity 19A:** This involves the removal of more than 5 cubic meters of material from an area (including but not limited to) within 100 meters inland of the high-water mark (HWM) of the sea. Although an exclusion applies to developments behind a designated setback line, part of the proposed development is located in front of the setback line, and within 100 m of the HWM, thereby triggering this activity (Figure 1.1).

Consequently, it was determined that EA must be obtained through a BA process. Anchor Environmental Consultants (Pty) Ltd. (Anchor) was appointed by the V&A Waterfront (the Applicant) to conduct the BA process and to coordinate the necessary specialist studies, in support of the environmental permitting process for the proposed development.

### 1.3 PURPOSE OF THIS REPORT

This Site Sensitivity Verification (SSV) Report has been prepared as part of the BA process for the proposed mixed-use development at the V&A Waterfront in Cape Town. The SSV Report presents the findings of the Department of Forestry, Fisheries and the Environment (DFFE) Screening Tool (as gazetted in Government Notice (GN) 960 of 2019) and outcomes of the SSV process.

It complies with the requirements of the protocols applicable to each environmental theme, as published in the relevant GNs and in accordance with the NEMA. In accordance with the applicable protocols, this report must:

*“(a) confirm or dispute the current use of the land and environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.;*

*(b) contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity...”*

## 2 BACKGROUND AND QUALIFICATIONS OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER

---

This SSV Report was Completed by Ms Cheruscha Swart and Mr Michael Armitage.

**Cheruscha Swart** holds a Master of Science (MSc) in Zoology, as well as an Honours (BSc Hons) and Bachelor of Science (BSc) degree in Biodiversity and Ecology from Stellenbosch University. She is a Registered Environmental Assessment Practitioner (EAP) with 12 years of research and consulting experience. At Anchor Environmental Consultants, she serves as a Senior Consultant and Head Environmental Assessment Practitioner (EAP), leading multiple projects. Her expertise includes Environmental Impact Assessments (EIAs), applications for prospecting rights, management plan development, environmental compliance monitoring, baseline and monitoring surveys, and specialist impact assessments, all undertaken across marine, coastal, and terrestrial environments. In addition, she has specialist expertise in marine invertebrate taxonomy and rocky shore surveys. Her project portfolio spans a wide range of sectors, including land-based and offshore prospecting, offshore mining, agriculture, land- and sea-based aquaculture, solar desalination, residential and commercial developments, conservation surveys for protected areas, and long-term monitoring of bays and ports along the South African coast. Cheruscha is the author of three peer-reviewed scientific publications and numerous scientific reports, with additional projects and publications currently in preparation. **Professional Registrations:** Environmental Assessment Practitioners Association of South Africa (EAPASA) Registered EAP, Reg no. 2021/3298; South African Council for Natural Scientific Professions (SACNASP), PR.SCI.NAT, Reg no. 155305.

**Michael Armitage** holds an MSc in Environmental and Geographical Science (EGS) (with distinction), a BSc (Hons) in EGS (with distinction), and a BSc in EGS and Archaeology. His MSc research involved field research and comparative analysis on heavy metal contamination in the Knysna Estuary in South Africa and the Yangtze Estuary in China. His key focus areas are the integrated management of the environment, estuaries and water resources, with strong interests in pollution issues and archaeology. He is invested in pursuing integrated, “nature-based” solutions to problems traditionally solved with grey infrastructure design choices. Michael thrives on unpacking the complexities of dynamic systems and using this knowledge to optimise integrated management strategies. **Professional Registrations:** EAPASA Registered Candidate EAP, Reg no. 2024/7978.

## 3 SITE SENSITIVITY VERIFICATION PROCESS

---

### 3.1 SITE SENSITIVITY VERIFICATION PROTOCOL

Prior to initiating the BA Process, the legislated National Web-Based Environmental Screening Tool provided by the DFFE must be used to screen the proposed development area for environmental sensitivities.

The Screening Tool generates a Screening Tool Report (STR), which outlines key environmental themes (e.g., agriculture, terrestrial biodiversity, aquatic biodiversity, etc.) and assigns a sensitivity rating to each theme based on the development footprint and type. These ratings are categorised as “Very High”, “High”, “Medium”, or “Low”. The STR also highlights additional sensitivities, such as the potential presence of Species of Conservation Concern (SCC) and recommends a list of specialist studies required for the EIA process. In many cases, the tool will indicate that a Compliance Statement, rather than a detailed Specialist Impact Assessment, will be required for certain themes. A Compliance Statement is usually required where a Low environmental sensitivity has been identified for the environmental theme. In some instances, specific themes may be screened out entirely, meaning neither a detailed Specialist Impact Assessment nor a Compliance Statement would be required. The Screening Tool draws on numerous national spatial datasets to assign these ratings, and forms the starting point of the environmental assessment process. Its use became mandatory on 5 July 2019, as per GN 960 of 2019, issued by the Minister of DFFE.

However, due to the coarse spatial resolution and generalised nature of the Screening Tool outputs, the assigned sensitivities may not always accurately reflect actual on-site conditions. Therefore, the listed themes, sensitivity ratings, and associated study requirements, must be verified through a SSV process.

The SSV is required under the “Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes”, as set out in GN 320 of Government Gazette (GG) 43110 (2020) and GN 1150 of GG 43855 (2020, as amended), and promulgated under Sections 24(5)(a) and (h) and 44 of the NEMA. The SSV must be undertaken by a registered EAP, or jointly with a suitably qualified specialist, depending on the theme being verified, if the EAP does not have the requisite expertise to confirm or dispute the sensitivities.

The SSV and any subsequent specialist studies must comply with the relevant theme-specific protocols gazetted under GN 1150 (for Animal and Plant Species) and GN 320 (for Agriculture Aquatic Biodiversity, Terrestrial Biodiversity, Civil Aviation, and Defence). For themes where no protocols have been prescribed, assessments must be conducted in accordance with Appendix 6 of the 2014 EIA Regulations (e.g., for Marine Environment, Cultural Heritage and Archaeology, Palaeontology, Hydrology, Socio-economic, Geotechnical—note this list is not exhaustive). Additionally, assessments for animal, plant, aquatic, and terrestrial themes must consider the “Species Environmental Assessment Guidelines” (South African National Biodiversity Institute (SANBI), 2020).

A SSV typically involves analysis of recent satellite imagery and spatial datasets, a review of existing environmental data, an in-person site inspection and consultation with relevant specialists. The purpose of the SSV is to confirm or dispute the environmental themes and associated sensitivity ratings identified by the Screening Tool, as well as to verify the presence, condition, and status of SCC and other important environmental attributes. Based on the

findings, the EAP and/or relevant specialist(s) may confirm or revise the sensitivity ratings assigned by the Screening Tool. These verified or revised sensitivity ratings form the basis for determining the level of specialist assessment required for each theme—whether a detailed Specialist Impact Assessment, a Compliance Statement, or, where appropriate, a Statement of Exclusion. In addition, the EAP or specialist may motivate for the inclusion of additional specialist studies not originally recommended in the Screening Tool, should these be considered necessary based on site conditions. The findings of the SSV, including photographic evidence and a clear record of the EAP/ specialist’s sensitivity verification and assessment recommendations, are compiled in the SSV Report. Both the SSV Report and the STR must be submitted with the Basic Assessment Report (BAR) to the Competent Authority.

### 3.1 SITE SENSITIVITY VERIFICATION METHODOLOGY

The SSV process followed a multi-step approach to verify the environmental sensitivities. The SSV was led by Ms Cheruscha Swart, a registered EAP. Where applicable, suitably qualified specialists contributed to the verification of theme-specific sensitivities identified by the ST. The steps undertaken were as follows:

- **Screening Tool:** Results from the STR were reviewed, along with relevant spatial datasets, to identify potential environmental sensitivities within the proposed development footprint. Note that an initial STR was generated on 27 February 2025 under the application category: *“Any activity in an estuary, on the seashore, in the littoral active zone, or in the sea.”* Following an update to the Screening Tool database by the DFFE on 22 and 23 May 2025, and the site visit conducted on 23 May 2025, a second STR was generated on 29 May 2025 using the application category: *“Infrastructure | Localised Infrastructure | Infrastructure in the Sea, Estuary, Littoral Active Zone | Development Setback | 100m Inland or Coastal Public Property.”* This revised application category was selected as the proposed development is located in front of the Development Setback and within 100 m inland of the high-water mark, but not within the sea itself. Although two additional assessments (Avian and Geotechnical) were recommended in the second Screening Tool run, and Hydrology was no longer included, the environmental themes and sensitivity ratings remained consistent between the two runs and did not affect the overall sensitivity outcomes. After a slight update in the site layout (area expanded slightly to the left), another updated STR was generated on 24 October 2025. Except for the small increase in footprint, the STR from 29 May 2025 and 24 October 2025 are identical.
- **Desktop Review:** Recent satellite imagery and relevant spatial datasets were analysed to identify additional potential environmental sensitivities within the proposed development footprint and to assess current land cover, existing infrastructure, and landscape features
- **Site Visit:** A site inspection was undertaken on 23 May 2025 to ground-truth the STR findings. This involved assessing the actual on-site conditions and confirming the presence or absence of identified environmental features and sensitivities.
- **Consultation with Specialists:** Where sensitivities flagged by the Screening Tool required specialist input, appropriately qualified and registered specialists were consulted. For this SSV, input was specifically obtained from marine, socio-economic, heritage, visual, archaeological, and palaeontological specialists.

## 4 SITE SENSITIVITY VERIFICATION FINDINGS

### 4.1 SCREENING TOOL RESULTS

The assessment and SSV described in the remainder of this report is based on the updated STR, generated on 29 May 2025/ 24 October 2025. The area assessed using the Screening Tool is shown in Figure 4.1 below, while the results are summarised Table 4.1. This image was sourced from the STR generated on 24 October 2025.

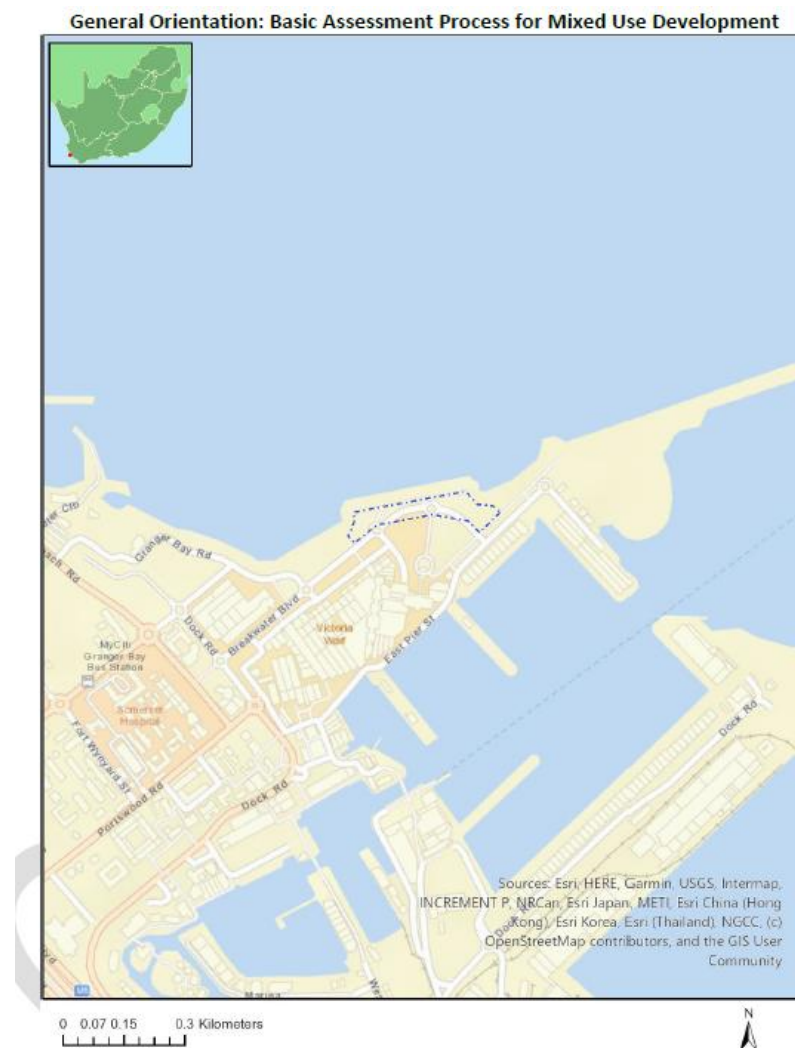


Figure 4.1. General location of the development for which the Screening Tool Report was generated.

Table 4.1. Summary of Environmental Themes, associated Sensitivity Ratings and Specialist Assessment as identified by the Screening Tool.

| Theme/ Identified Assessment         | Screening Tool Sensitivity Rating | Reason for Sensitivity rating/ assessment                          |
|--------------------------------------|-----------------------------------|--------------------------------------------------------------------|
| Archaeological and Cultural Heritage | Very High                         | Within 5km of a Grade I and within 2km of a Grade II Heritage site |

| Theme/ Identified Assessment |        | Screening Tool Sensitivity Rating                          | Reason for Sensitivity rating/ assessment                                                                                                                                                                                                                                                                                                  |
|------------------------------|--------|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Palaeontology                |        | Medium.                                                    | Potential features with a Medium paleontological sensitivity                                                                                                                                                                                                                                                                               |
| Landscape/Visual Assessment  | Impact | No rating. Only indication that an assessment is required. | Likely due to a combination of development's selected Application Category and site's location within a highly urbanised area of Cape Town.                                                                                                                                                                                                |
| Socio-Economic Assessment    |        | No rating. Only indication that an assessment is required. | Likely due to the development's selected Application Category, which often triggers this assessment by default. 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. |
| Marine Impact Assessment     |        | No rating. Only indication that an assessment is required. | Proximity of development to marine environment.                                                                                                                                                                                                                                                                                            |
| Civil Aviation               |        | High                                                       | Due to eastern corner of development overlapping with area classified as "dangerous and restricted airspace".                                                                                                                                                                                                                              |
| Animal Species               |        | Medium                                                     | Due to coarse spatial planning layers which indicated the possible presence of: <i>Invertebrates-Conocephalus peringueyi</i> (Meadow Katydid) & <i>Bullacris obliqua</i> (Bladder grasshopper). Both categorised as Vulnerable on the International Union for Conservation of Nature (IUCN) Red List.                                      |
| Plant Species                |        | Low.                                                       | Likely due to the use of broad-scale spatial layers that may flag areas based on regional vegetation types.                                                                                                                                                                                                                                |
| Terrestrial Biodiversity     |        | Low.                                                       | Likely the result of national-scale spatial datasets used in the tool, which can sometimes overestimate sensitivity in urban or transformed areas due to the coarse resolution of the underlying data.                                                                                                                                     |
| Aquatic Biodiversity         |        | Low.                                                       | Likely the result of broad-scale spatial datasets used in national-level screening tools, which may inaccurately flag areas as potentially supporting aquatic features such as watercourses, wetlands, or rivers.                                                                                                                          |
| Defence Theme                |        | Very High.                                                 | Due to majority of general area being classified as a "Military and Defence Site".                                                                                                                                                                                                                                                         |
| Avian Impact Assessment      |        | No rating. Only indication that an assessment is required. | Likely due to the development's proximity to marine environment.                                                                                                                                                                                                                                                                           |
| Geotechnical Assessment      |        | No rating. Only indication that an assessment is required. | Likely due to selected National Sector Category/ Application Category, which often triggers this assessment by default.                                                                                                                                                                                                                    |

## 4.2 DESKTOP REVIEW

### 4.2.1 MUNICIPAL LAND ZONING AND LAND-USE

A significant portion of the V&A Waterfront in Cape Town is built on reclaimed land (land "created" through the artificial infilling/ deposition of material, such as rubble and sand). Such reclamation was crucial to the city's development, enabling the expansion of the V&A

Waterfront and the creation of the mixed-use area it is today. The proposed development will therefore take place entirely on reclaimed land.

Municipal zoning within the City of Cape Town (CoCT) is regulated by the Development Management Scheme (DMS) falling under the CoCT Municipal Planning By-Law (2015), which designates areas with different zonings based on their permissible uses.

The proposed development site is currently zoned as Mixed Use 3 (MU3; **Error! Reference source not found.**, CoCT Municipal Planning Bylaw, 2025). 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.

#### 4.2.2 BIODIVERSITY SPATIAL PLANNING CONSIDERATIONS

##### *CRITICAL BIODIVERSITY AND AREAS OF CONSERVATION CONCERN*

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

The mapping datasets used to construct these CBA maps include CBAs, Ecological Support Areas (ESAs) and formally Protected Areas (Pool-Stanvliet et al., 2017; Harris et al., 2022; City of Cape Town, 2023b). **Note:** The proposed development area does not intersect with any of these priority biodiversity area (Figure 4.2).

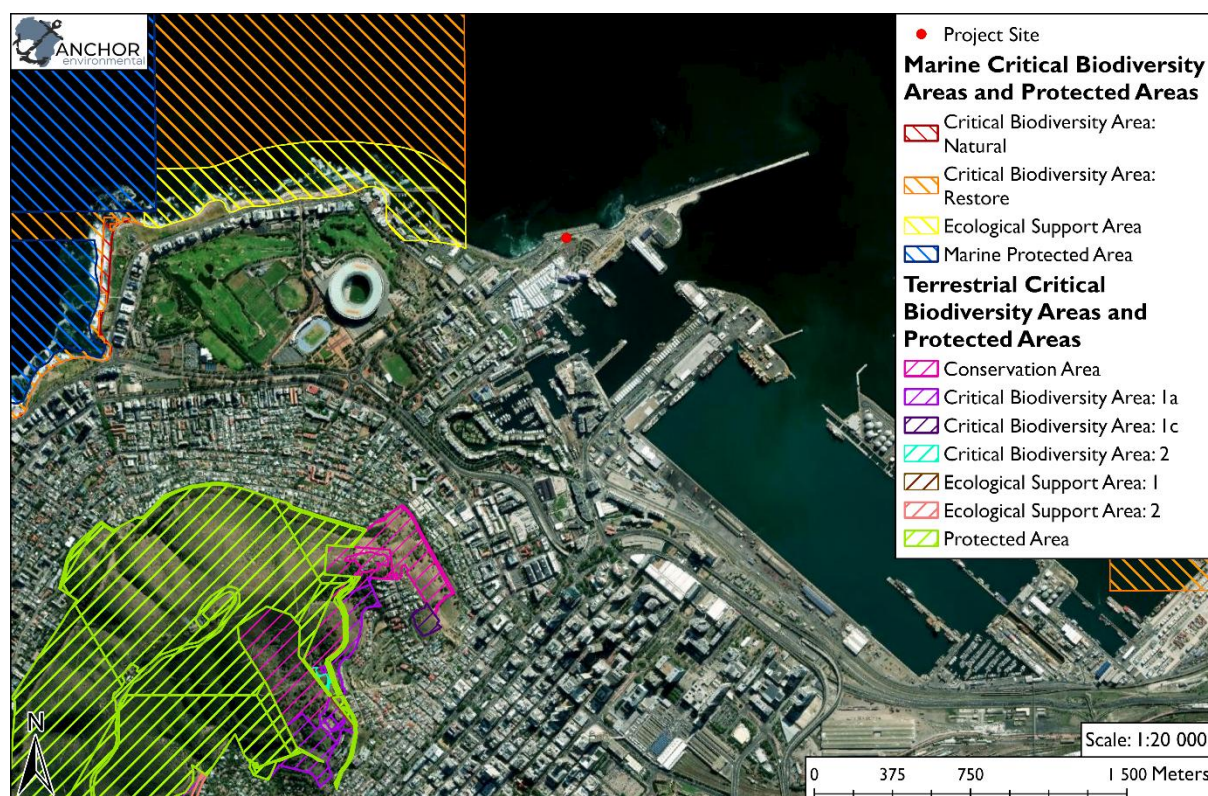


Figure 4.2. Marine, Terrestrial, and Aquatic Critical Biodiversity Areas (CBAs) in the area (Harris *et al.*, 2022; City of Cape Town, 2023b).

#### ECOSYSTEM THREAT STATUS AND ECOSYSTEM TYPES

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

The proposed area falls within the Cape Mixed Shore Ecosystem (Figure 4.3), which has been classified as a “Vulnerable” Marine Ecosystem (Figure 4.4). According to the *National list of ecosystems that are threatened and in need of protection*, as published under the National Environmental Management: Biodiversity Act (NEMBA; Act 10 of 2004), “Vulnerable” ecosystems are “ecosystems that have a high risk of undergoing significant degradation of ecological structure, function or composition as a result of human intervention, although they are not critically endangered ecosystems or endangered ecosystems”. Despite this classification, the site is heavily degraded and artificial. In addition, as the proposed development will take place entirely on land, there is no anticipated removal or disturbance of marine habitat.

**Note:** The site does not overlap with any Terrestrial or Aquatic Ecosystems of concern, neither does it overlap with any Ecosystems considered to be “Endangered” or “Critically Endangered” (Figure 4.3 and Figure 4.4).

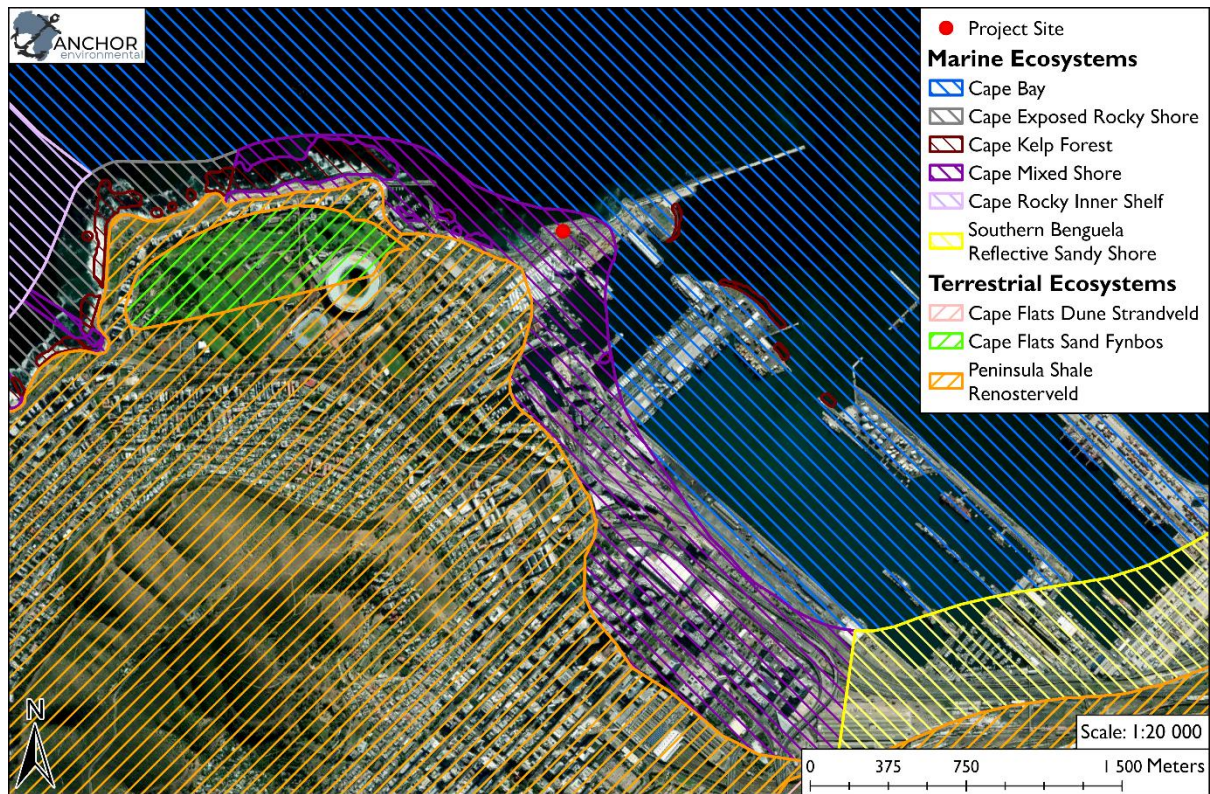


Figure 4.3. Marine and Terrestrial Ecosystem types within the area as per the 2018 NBA (Sink *et al.* 2019; Skowno *et al.* 2019).

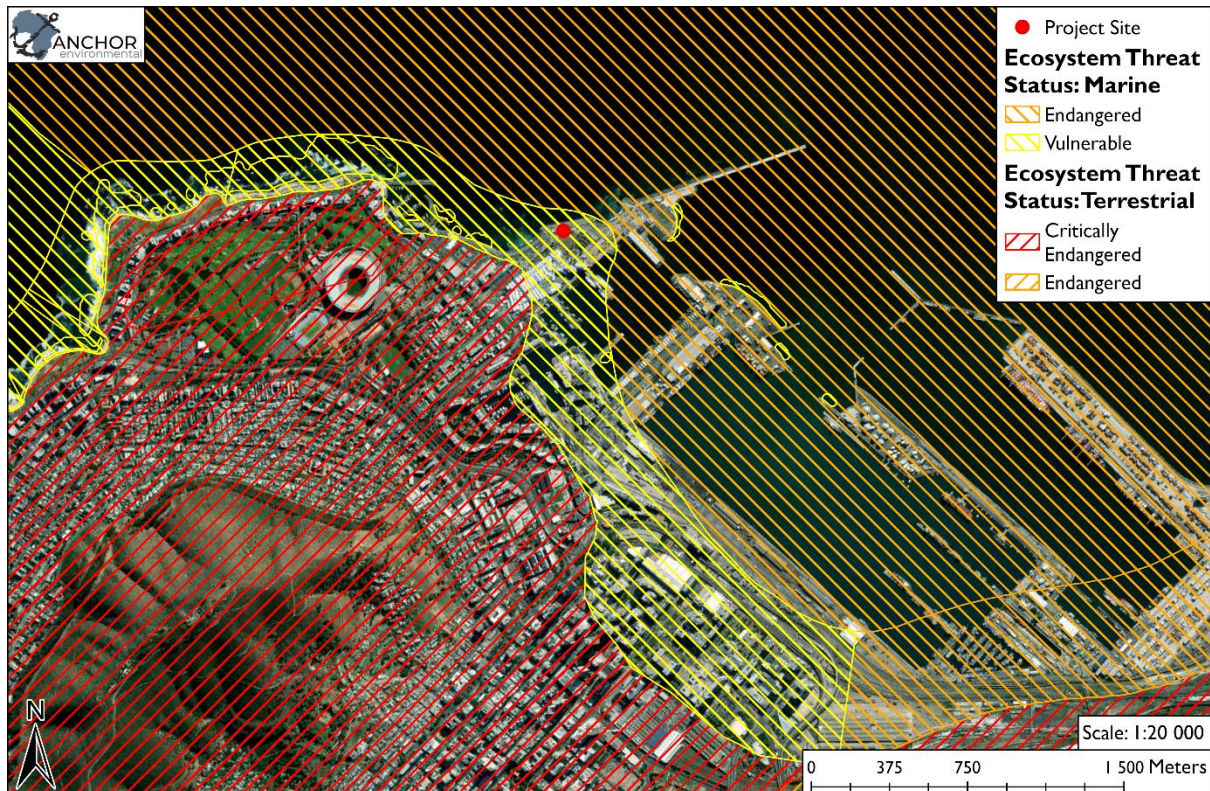


Figure 4.4. Marine and Terrestrial Threat Status of the area as per the 2018 NBA (Sink *et al.*, 2019; Skowno *et al.*, 2019).

### KEY BIODIVERSITY AREAS

Key Biodiversity Areas (KBAs) are internationally recognised as “sites that contribute significantly to the global persistence of biodiversity,” whether in terrestrial, freshwater, estuarine, or marine ecosystems (SANBI, 2024). The entire project site falls outside of, and is not in close proximity to, any designated KBA (Figure 4.5).



Figure 4.5. Delineated Key Biodiversity Areas within the area (South African KBA NCG, 2024).

### NATIONAL FRESHWATER ECOSYSTEM PRIORITY AREAS

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

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

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

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



Figure 4.6. Location of the proposed development in relation to freshwater and estuarine features, including National Freshwater Ecosystem Priority Area (NFEPA) rivers and wetlands (Nel *et al.*, 2011), the Estuarine Functional Zone (EFZ) (Van Niekerk *et al.*, 2019a) and wetlands delineated in the National Wetlands Map Version 5 (Van Deventer *et al.*, 2018).

#### STRATEGIC WATER SOURCE AREA

The site falls within the broader “Table Mountain Surface Water Strategic Water Source Area” (SWSA). Surface water SWSAs are defined as land areas that contribute a disproportionately high volume of mean annual surface water runoff relative to their size, while groundwater SWSAs are areas with both high groundwater availability and national-level importance. Although the proposed development falls within a designated SWSA, this classification covers much of the western Cape Town area.

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

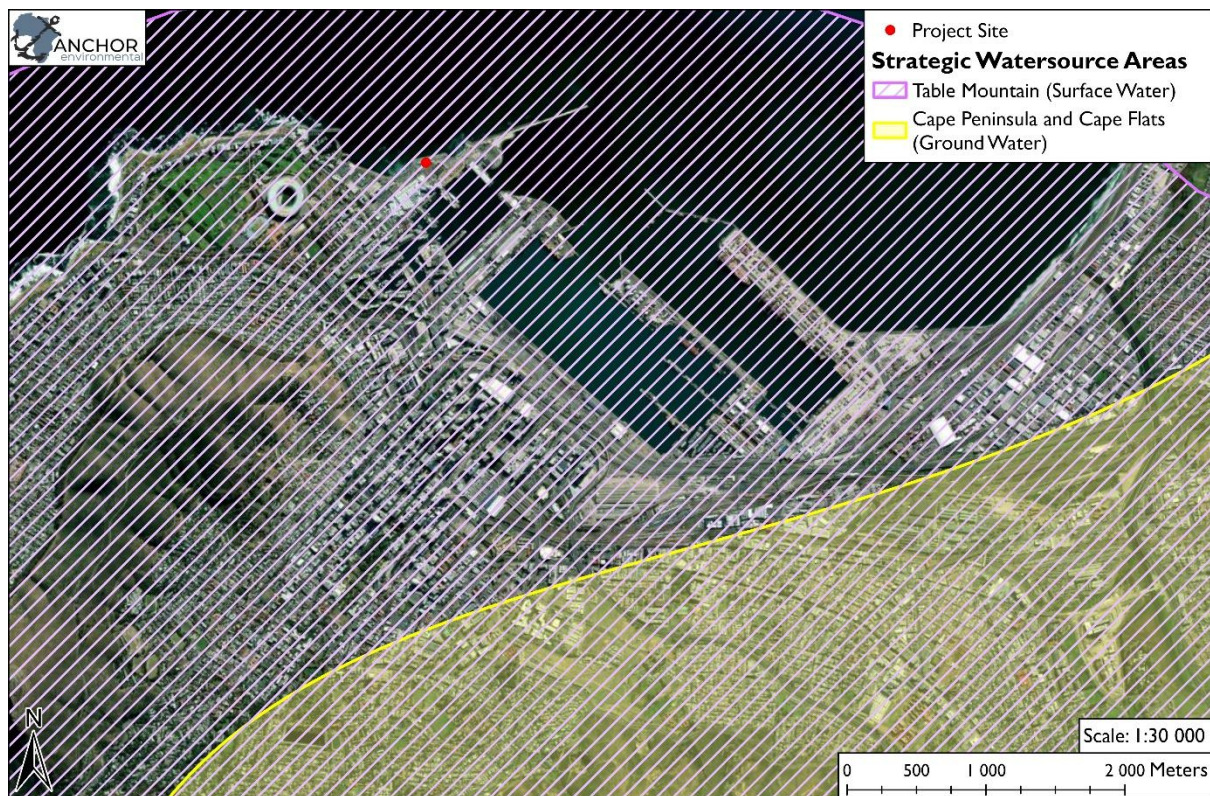


Figure 4.7. Strategic Water Source Areas National Freshwater Ecosystem Priority Areas in the area. The site falls within the Table Mountain Surface Water SWSA (Le Maitre *et al.*, 2018).

## 4.1 SITE ASSESSMENT

### 4.1.1 CURRENT LAND-USE AND CONDITION OF THE SITE

Findings from the site inspection conducted by the EAP on 23 May 2025 are summarised in this section. The proposed development is located within a highly transformed and urbanised environment, adjacent to the Port of Cape Town and V&A Waterfront Harbour. The area is characterised by a mix of commercial, residential, industrial, and tourism-related developments.

The site itself is situated on reclaimed land, with an underlying substrate comprising compacted fill material, which is likely a mixture of sand, sediment, rubble, and gravel. This reclaimed area is overlain by concrete to support the construction of harbour/ breakwater infrastructure, as well as other associated developments. Consequently, the area is inherently artificial and does not comprise any natural habitat. As the purpose of this reclaimed land has always been for development, ongoing construction is common in the area, as is evidenced by the construction of previously authorised developments on adjacent sites (Figure 4.8). The site earmarked for the proposed development has, till now, been used as an overflow parking area. It therefore includes associated urban infrastructure such as roads, streetlights, stormwater systems, pedestrian walkways, and several small, landscaped areas (as shown in the map in Figure 1.1). A portion of the site also functioned as a storage container area, which remains in place and is located mostly in front of the proposed Parcel O (Figure 4.9).



Figure 4.8. Construction of another development occurring south of the proposed site. Parcel P is located to the right of the construction area (not fully visible in this photo), while Parcels O and a1 & a2 are visible in the distance near the grass and palm trees.



Figure 4.9. Existing storage container site partially overlapping with, and situated in front of, proposed Parcel O.

Although the main road is still in use, the site is no longer functioning as a parking lot, due to ongoing construction in the vicinity. It is now primarily being used for container storage, construction materials, and as a site camp and parking area for construction workers associated with the adjacent development. Figure 4.10 provides a panoramic view of the site from west (Parcel O, on the left side of the photo) to east (Parcel P, on the right side). Atlantic Park and Parcels a1 & a2 can be seen in the background to the left, where the palm trees are located.

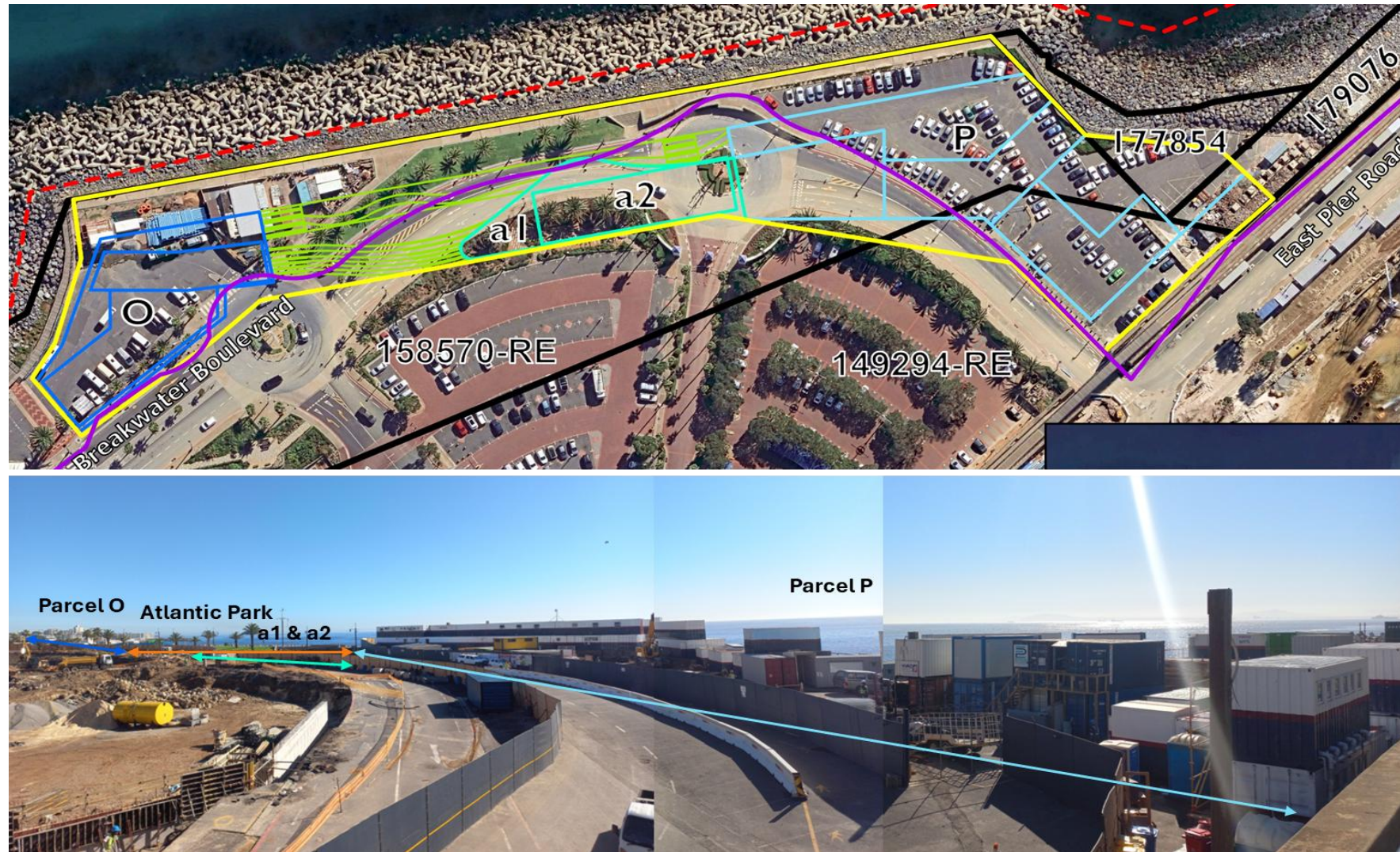


Figure 4.10 Panoramic photograph of the entire proposed development site, taken from a footbridge on the east, facing west. Parcel O is visible on the left, Parcel P on the right, and Atlantic Park with Parcels a1 & a2, is visible in the background on the left near the palm trees.

Most of Parcel P is presently sectioned off for use as a storage space for containers and construction material, as well as a site camp and parking area for construction workers (Figure 4.11). Parcel O is currently functioning as a roadway and parking area, while a portion of the site is also used as a permanent storage area for containers and temporary storage area for construction materials (Figure 4.12). Atlantic Park and the adjacent Parcels a1 & a2, are currently comprised of sidewalks, roads, small patches of grass, palm trees, and landscaped traffic islands with shrubs/ trees. Parts of these areas are also sectioned off due to construction on the adjacent land parcels (Figure 4.13). The narrow strip on the seaward side of the parcels (the Promenade), located north of the proposed Atlantic Park, is still used primarily as a walkway (Figure 4.14). As mentioned earlier, this Promenade is to be widened to approximately nine metres, to allow for improved views of the water.

The current land use remains consistent with the site's CoCT zoning as MU3. The proposed future mixed-use development will also comply with the MU3 zoning, which permits 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 4.11. Closer view of Parcel P, currently enclosed and used for container storage, construction materials, as a site camp, and parking for construction workers.



Figure 4.12 Parcel O, currently functioning as a roadway, parking area, and container storage. It is also used for temporary storage of construction materials.



Figure 4.13 Left: Atlantic Park, primarily consisting of a road and a small strip of grass with palm trees. Right: Parcels a1 & a2, located in front of the grass and adjacent to Atlantic Park, currently comprising roadways, parking areas, and paved sidewalks.



Figure 4.14 The narrow strip known as the Promenade, located on the seaward side of the parcels, still serving as a public walkway, and proposed for widening to approximately nine metres.

#### 4.1.2 TERRESTRIAL BIODIVERSITY

The only vegetation within the proposed development area consists of small, landscaped features, such as strips or patches of grass with planted palm trees, and traffic islands with ornamental shrubs or trees. These areas are entirely artificial and designed for recreational and aesthetic purposes rather than providing any natural ecological function. The site does not support naturally occurring indigenous vegetation, natural soil profiles, or faunal habitats. It holds no ecological or conservation value, which confirms its status as an artificial urban environment.

#### 4.1.3 COASTAL AND MARINE ENVIRONMENT

The coastal environment lies adjacent to, yet outside the property and development boundary. It consists of an artificially constructed revetment made up mostly of gravel, rocks, rubble, boulders, and dolosse, with some interspersed sandy pockets (Figure 4.15). Very sparse vegetation is present in a few of these sandy and gravelly areas, mostly growing in the strip just between the palisade fence and the start of the main accumulation of boulders and dolosse (see Figure 4.16). Given that this is reclaimed land, the vegetation is secondary and likely established itself naturally over time or is an escapee from the landscaping undertaken by the V&A Waterfront. Species could not be confidently identified due to the absence of flowers. However, none of the species are anticipated to be of conservation concern. As the vegetation is sparse, degraded, of low ecological value, and lies outside the proposed development footprint, the impacts from construction and operation will be considered negligible.

The marine environment lies well beyond the proposed development footprint, with the shoreline providing a buffer between the two. As such, no construction activities are expected

to directly impact the marine environment and the impacts from construction and operation will be considered negligible.



Figure 4.15. The coastal environment in front of the development is an artificial shoreline comprising gravel, rocks, rubble, boulders, dolosse, and some sandy patches.



Figure 4.16. Sparse patches of degraded vegetation growing outside of the proposed site. Included are flowering succulents, a type of vine, common weeds and a type of creeping ground cover.

## 5 SITE SENSITIVITY VERIFICATION RESULTS

---

Sections 5.1 to 5.13 provides a detailed description of the assessment outcomes for each theme, based on the SSV process.

### 5.1 ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME

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 Heritage Impact Assessment (HIA) is required.

Additionally, a Record of Decision (under Section 38(1) of the National Heritage Resources Act (NHRA: Act No. 25 of 1999), issued by Heritage Western Cape (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 Notice of Intent to Develop (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). Given the existing Memorandum of Understanding (MoU) between HWC and the DEA&DP on the integrated handling of HIAs within NEMA applications, this HIA will serve both the NEMA and NHRA processes. The HIA will be undertaken by Cindy Postlethwayt.

### 5.2 PALAEOLOGY THEME

The Screening Tool identified the palaeontological sensitivity of the project area as “Medium”, due to some datasets used by the Screening Tool indicating the area as supporting potential features with a Medium paleontological sensitivity.

The Palaeontologist, John Pether, was contacted and confirmed that the Screening Tool’s palaeontological sensitivity map is inaccurate for this location. He noted that the development site is situated on reclaimed, artificial land, which holds no palaeontological value, and therefore, a Palaeontological Impact Assessment (PIA) is not required. The South African Heritage Resources Information System (SAHRIS) palaeosensitivity map, which is considered more accurate, labels the fill area of the Foreshore and quay walls as “Quaternary dunes” (Qd) (Figure 5.1). The Quaternary refers to the most recent geological epoch (time period), spanning the last 2.6 million years up to the present, and therefore includes even very recent deposits. Although Qd generally refers to naturally formed dunes, in this context it refers to the artificially filled area which does not contain natural fossil-bearing material.

The EAP agrees that there is no sensitivity for this theme, and it will therefore be screened out. The Heritage Specialist will include the relevant motivation in the NID and in the HIA to be submitted to HWC for confirmation.

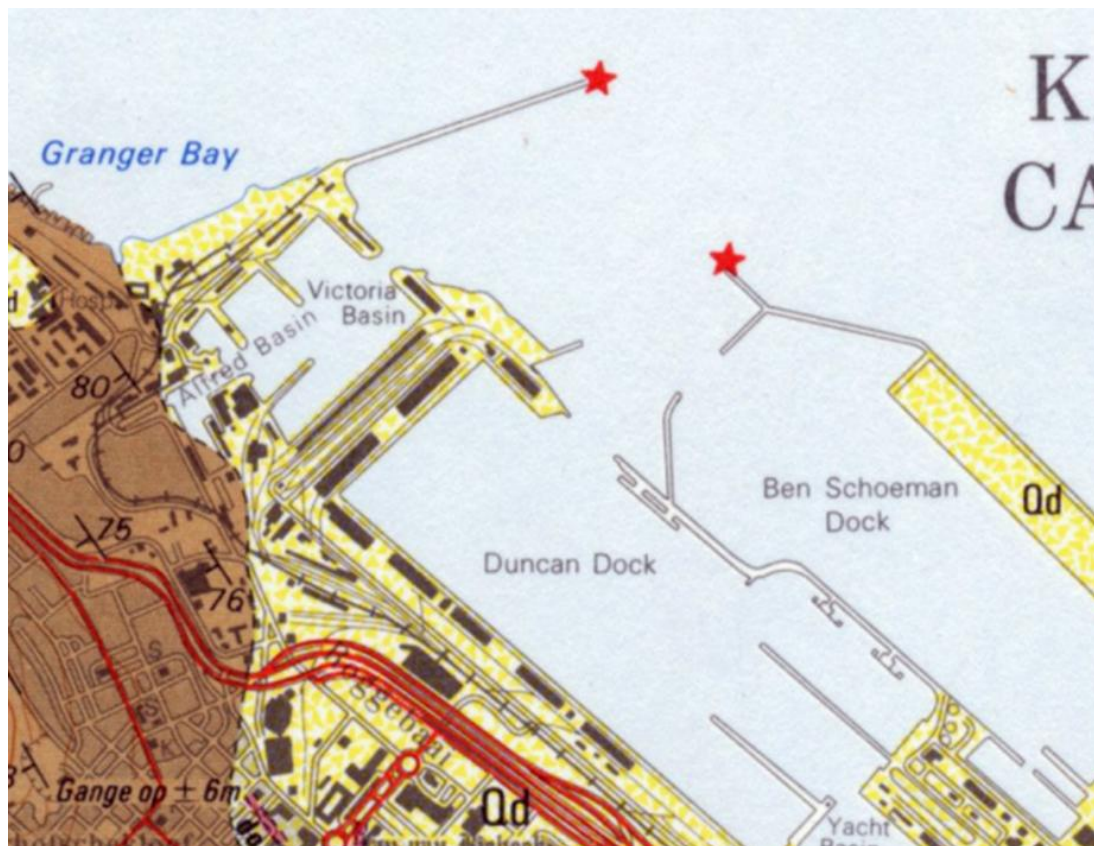


Figure 5.1: SAHRIS palaeo-sensitivity map of where the proposed development will occur (Source: <https://www.sahris.org.za/>).

### 5.3 LANDSCAPE/VISUAL ASSESSMENT

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 for an assessment is therefore considered accurate, and the EAP agrees that a Landscape / Visual Impact Assessment is warranted.

The RNID issued by HWC further confirmed the requirement for visual and townscape assessments as part of the HIA. Claire Abrahamse, who conducted the visual and townscape assessments for the earlier HIA of this area, has been appointed to undertake updated studies for the current development. These will inform both the HIA under the NHRA and the BA process under the NEMA.

### 5.4 SOCIO-ECONOMIC ASSESSMENT

The Screening Tool identified the need for a Socio-Economic Impact Assessment. This is likely due to the selected development's selected Application Category within the Screening Tool,

which often triggers this assessment by default. It 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 EAP therefore agrees with the Screening Tool and recommend that a Socio-Economic Impact Assessment be prepared by a suitably qualified Socio-Economic Specialist.

## 5.5 MARINE ECOLOGY IMPACT ASSESSMENT

The Screening Tool identified the need for a Marine Impact Assessment due to the development's proximity to the marine environment. Despite the ecosystem being classified as "Vulnerable.", this coastal environment is artificial and heavily degraded as a result of reclamation and the development of coastal defence infrastructure. Furthermore, the proposed development will take place entirely on land, with no anticipated removal or disturbance of marine habitat, and no expected changes to hydrodynamic functioning or water quality. Therefore, further modification of this environment is not expected to have a significant impact on the health or functioning of the broader marine ecosystem. The site also does not overlap with any CBA, ESA, or Protected Areas, according to Harris *et al.* (2022)(see Section 4.1.3).

As a result, a detailed Marine Specialist Impact Assessment is not considered necessary. A specialist-prepared Marine Ecology Compliance Statement is deemed sufficient for this application. A statement, rather than screening out of the theme entirely, is recommended due to the site's proximity to the marine environment.

## 5.6 CIVIL AVIATION THEME

The National Screening Tool identified the site as being of High Sensitivity for Civil Aviation. This is likely due to the eastern corner of the development overlapping with a site classified as dangerous and restricted airspace as well as the fact that the remainder of the site is situated between 15 and 35 km from a civil aviation radar and from a major civil aviation aerodrome.

According to the Civil Aviation Regulations (SA-CATS; GN R425, as amended), concerns relating to civil aviation typically arise from developments that may interfere with flight paths, impact radar systems used by aircraft and air traffic controllers or involve tall structures near highways (which may serve as emergency landing strips). These concerns are generally related to height thresholds, relative to radar and aerodrome elevations, which are only applicable if the development falls within specified distances of civil aviation radar installations or aerodromes.

The proposed buildings will have a maximum height of approximately 32 m, while the site itself is about 2 m above sea level. This places the maximum building elevation at roughly 34 m above sea level, which is still approximately 13 m lower than the Cape Town International Airport runway elevation (approximately 47 m above sea level; see Figure 5.2). In addition, the proposed structures will not exceed the height of existing buildings on the site. Given that taller buildings already exist in the vicinity, any significant interference with aviation operations would already have occurred if such impacts were a concern.

Additionally, even though the site is located within 200 m of a helicopter tour agency with a launching area, there are currently no specific building height/ obstacle regulations or restrictions that apply to developments in proximity to heliports, with former restrictions being removed in the March 2025 amendments to the SA-CATS (GN 6061 of 2025). However, the helicopter company and the Civil Aviation Authority will be included as Interested and Affected Parties (I&APs) to ensure that, should any permissions be required (which is unlikely), the necessary processes are followed, and these entities are fully informed of the proposed development.

Based on the above, this theme is screened out and no further assessment during the BA process is deemed necessary.



Figure 5.2. Approximate Ground Level of the Project Site, relative to the height of the runway at Cape Town International Airport (Google Earth Imagery, 2025).

## 5.7 ANIMAL SPECIES THEME

The Screening Tool identified the project area as having “Medium” sensitivity for animal species, due to the potential presence of two invertebrate SCC: *Conocephalus peringueyi* (meadow katydid) and *Bullacris obliqua* (bladder grasshopper), both listed as Vulnerable on the IUCN Red List. These species are typically flagged based on the presence of suitable habitat types identified in regional BSPs. However, such data is often coarse and may not accurately reflect actual site conditions.

In this case, these species do not occur within the study area, due to the artificial nature of the site, being reclaimed land with no natural habitat. On this basis, the EAP confirms that there is no sensitivity associated with this theme, and it is therefore screened out. No further assessment is required as part of the BA process.

## **5.8 PLANT SPECIES THEME**

The Screening Tool identified the project area as having “Low” sensitivity for the Plant Species theme. This is likely due to the use of broad-scale spatial layers that may flag areas based on regional vegetation types, despite local-scale transformation.

However, the site is entirely artificial, located on reclaimed land within a dense urban environment, and contains no natural vegetation or suitable habitat for conservation-important plant species. The SSV confirmed the complete absence of indigenous vegetation within the development footprint. Based on the artificial nature of the site, lack of suitable habitat, and SSV findings, the EAP confirms that the Plant Species theme holds no sensitivity. The theme is therefore screened out, and no further assessment is required as part of the BA process.

## **5.9 TERRESTRIAL BIODIVERSITY THEME**

The Screening Tool assigned a “Low” sensitivity rating to the site for terrestrial biodiversity. This is likely the result of national-scale spatial datasets used in the tool, which can sometimes overestimate sensitivity in urban or transformed areas due to the coarse resolution of the underlying data.

In reality, the site is artificial and consists entirely of reclaimed land within a highly urbanised setting and supports no natural terrestrial habitat. Furthermore, it does not overlap with any CBAs, ESAs, or ecosystems identified as threatened or of conservation concern in the 2018 NBA. Based on the site’s artificial nature and the absence of any significant biodiversity features, the EAP confirms that there is no terrestrial biodiversity sensitivity. This theme is therefore screened out, and no further assessment is required as part of the BA process.

## **5.10 AQUATIC BIODIVERSITY THEME**

The Screening Tool assigned a “Low” sensitivity rating to the site for aquatic biodiversity. This is likely the result of broad-scale spatial datasets used in national-level screening tools, which may inaccurately flag areas as potentially supporting aquatic features such as watercourses, wetlands, or rivers. These datasets often rely on coarse planning layers and do not always reflect fine-scale, site-specific conditions.

In this case, the site comprises entirely reclaimed land within a highly urbanised environment and does not contain any natural aquatic features or freshwater systems. Furthermore, as outlined in Section 4.2.2, the proposed development will not affect any freshwater ecosystems identified as conservation-worthy by NFEPA or SWSAs. Based on the artificial nature of the site and the absence of any aquatic resources, the EAP confirms that there is no aquatic biodiversity sensitivity. This theme is therefore screened out, and no further assessment is required as part of the BA process.

## 5.11 RELATIVE DEFENCE THEME

The Screening Tool identified the site as having “Very High” sensitivity in terms of Defence due to a most of the general area being classified as a “Military and Defence Site”. Potential defence-related impacts generally relate to the possibility of a development interfering with or disrupting military radar installations and radar returns. However, the location of the site in relation to sea level, the fact that there are surrounding tall structures, along with the relatively small construction footprint and the maximum height of the proposed buildings, suggests that the development is unlikely to have any measurable effect on defence or military radar infrastructure. In addition, the proposed land use (hotel, residential, and mixed-use development) is not associated with any defence-related concerns. On this basis, the EAP confirms that there is no sensitivity for this theme, and it is therefore screened out. No further assessment is required during the BA process.

## 5.12 AVIAN

The Screening Tool identified the potential need for an Avian Assessment, likely due to the site’s proximity to the marine environment and the possibility that sea birds breed or inhabit on or near the site. However, no bird species were observed breeding or inhabiting the site or its immediate surroundings, likely due to the area currently being subjected to high levels of activity, foot traffic, and noise. Given the artificial and disturbed condition of the site, as well as the nature of the proposed development, it is unlikely that marine or other avifauna will be negatively affected.

On this basis, the EAP confirms that there is no sensitivity for the Avian Theme, and it is therefore screened out. No further assessment is required as part of the BA process.

## 5.13 GEOTECHNICAL

A Geotechnical Assessment has been identified as a potential requirement for this project. This is likely due to the development’s selected Application Category within the Screening Tool, which often triggers this assessment by default. These studies are typically used to assess the physical and mechanical properties of soil and rock to inform structural design, construction feasibility, and ground stability. They are critical in areas with complex subsurface conditions, or where slope stability, settlement risk, or foundation safety is a major consideration. While geotechnical investigations are important from an engineering and design perspective, a separate Geotechnical Assessment as part of the BA process is not considered necessary for this project because the subsurface conditions are artificial comprising imported fill. As such the geotechnical study would not assist in determining subsurface characteristics that are associated with natural areas which can be used to determine depth to groundwater, the presence of perched water tables, etc. Being part of a larger reclaimed area a geotechnical investigation would be superfluous in this regard. Other relevant geotechnical aspects such as foundational stability are being addressed through a dedicated engineering study undertaken as part of the detailed design phase.

Given that the site comprises part of a larger reclaimed area with artificial subsurface conditions the EAP is of the opinion that a geotechnical investigation to inform the BA process is not required.

## 6 CONCLUSION

The SSV confirmed that the site comprises an artificially constructed environment on reclaimed land, with no natural aquatic or terrestrial biodiversity features present.

Of the thirteen themes identified by the National Screening Tool, the SSV found that nine are not applicable to the site (see Table 6.1). As such, these themes hold no environmental sensitivity and have been screened out. No further assessment is therefore required for them.

Only four themes were confirmed as applicable and will be assessed as part of the BA process. Three will be addressed through detailed Specialist Impact Assessments, and one through a specialist-prepared Compliance Statement. All assessments will be undertaken in accordance with the relevant gazetted protocols for specialist assessments (refer to Section 3.1).

Table 6.1 provides a summary of the Screening Tool themes, associated sensitivity ratings, and required assessments. It also reflects the EAPs verified sensitivity ratings and assessment recommendations for each theme based on the SSV outcomes. The proposed assessments will be undertaken accordingly.

Table 6.1. Summary of environmental themes and associated sensitivity ratings identified by the Screening Tool, with confirmed or amended ratings by the EAP and resulting assessment requirements based on the Site Sensitivity Verification.

| Theme/<br>Identified<br>Assessment         | Screening<br>Tool<br>Sensitivity<br>Rating                             | EAP-Sensitivity Rating<br>based on SSV Results  | EAPs Assessment Recommendation/ Study<br>Requirement and Protocol to be followed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------|------------------------------------------------------------------------|-------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Archaeological<br>and Cultural<br>Heritage | Very High                                                              | Very High. In agreement<br>with Screening Tool. | <p>Submission of NID to HWC. Heritage Impact Assessment (HIA) Specialist Study led by Cindy Postlethwayt.</p> <p><b>Protocol:</b><br/>Gazetted General Requirement Assessment Protocols published under Government Notice (GN) 320 in Government Gazette (GG) 43110 (2020):</p> <p><i>“SSV and specialist assessment and minimum report content requirements where a specialist assessment is required but no specific assessment protocol has been prescribed”.</i></p> <p>Appendix 6 of the EIA Regulations, 2014 as published under NEMA.</p> <p>Requirements as stipulated in the RNID.</p> <p>As this HIA will serve both the NEMA and NHRA processes, it will follow protocols and guidelines required under both Acts.</p> |
| Landscape/Visual<br>Impact<br>Assessment   | No rating.<br>Only<br>indication that<br>an assessment<br>is required. | In agreement that<br>assessment is required.    | <p>Specialist Study led by Claire Abrahamse.</p> <p><b>Protocol:</b><br/>Gazetted General Requirement Assessment Protocols published under GN 320 in GG 43110 (2020).</p> <p>Appendix 6 of the EIA Regulations, 2014.</p> <p>Requirements as stipulated in the RNID.</p> <p>DEA&amp;DP Visual Guidelines</p>                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Theme/<br>Identified<br>Assessment | Screening<br>Tool<br>Sensitivity<br>Rating                    | EAP-Sensitivity Rating<br>based on SSV Results                                            | EAPs Assessment Recommendation/ Study<br>Requirement and Protocol to be followed                                                                                                                                                                                                              |
|------------------------------------|---------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    |                                                               |                                                                                           | As this VIA will serve both the NEMA and NHRA processes, it will follow protocols and guidelines required under both Acts.                                                                                                                                                                    |
| Socio-Economic<br>Assessment       | No rating.<br>Only indication that an assessment is required. | In agreement that assessment is required.                                                 | Socio-Economic Impact Assessment by a suitably qualified Specialist. Study will be led by Anchor's in-house specialist.<br><br><b>Protocol:</b><br>Gazetted General Requirement Assessment Protocols published under GN 320 in GG 43 I 10 (2020).<br>Appendix 6 of the EIA Regulations, 2014. |
| Marine Impact<br>Assessment        | No rating.<br>Only indication that an assessment is required. | In agreement that assessment is required. Sensitivity is considered to be Low.            | Compliance Statement deemed sufficient. Study will be led by Anchor's in-house Marine Specialist.<br><br><b>Protocol:</b><br>Gazetted General Requirement Assessment Protocols published under GN 320 in GG 43 I 10 (2020).<br>Appendix 6 of the EIA Regulations, 2014.                       |
| Palaeontology                      | Medium                                                        | Not in agreement. Screened out by the specialist John Pether. EAP agrees with specialist. | No further assessment is required.                                                                                                                                                                                                                                                            |
| Civil Aviation                     | High                                                          | Not in agreement. Screened out. No sensitivity for this theme.                            | No further assessment is required.                                                                                                                                                                                                                                                            |
| Animal Species                     | Medium                                                        | Not in agreement. Screened out. No sensitivity or SCC for this theme.                     | No further assessment is required.                                                                                                                                                                                                                                                            |
| Plant Species                      | Low                                                           | Not in agreement. Screened out. No sensitivity for this theme.                            | No further assessment is required.                                                                                                                                                                                                                                                            |
| Terrestrial Biodiversity           | Low                                                           | Not in agreement. Screened out. No sensitivity for this theme identified.                 | No further assessment is required.                                                                                                                                                                                                                                                            |
| Aquatic Biodiversity               | Low                                                           | Not in agreement. Screened out. No sensitivity for this theme identified.                 | No further assessment is required.                                                                                                                                                                                                                                                            |
| Defence Theme                      | Very High                                                     | Not in agreement. Screened out. No sensitivity for this theme.                            | No further assessment is required.                                                                                                                                                                                                                                                            |
| Avian Impact<br>Assessment         | No rating.<br>Only indication that an assessment is required. | Not in agreement. Screened out. No sensitivity for this theme.                            | No further assessment is required.                                                                                                                                                                                                                                                            |
| Geotechnical<br>Assessment         | No rating.<br>Only indication that an assessment is required. | Not in agreement. Screened out.                                                           | No further assessment is required.                                                                                                                                                                                                                                                            |

## 7 REFERENCES

- City of Cape Town. (2023b). City of Cape Town Open Data Portal: Biodiversity Network (BioNet) [WWW Document]. URL [https://odp-cctegis.opendata.arcgis.com/datasets/4f2d7835518a4e6b8205ce12d77ff463\\_133/explore?location=-33.913601%2C18.654700%2C9.65](https://odp-cctegis.opendata.arcgis.com/datasets/4f2d7835518a4e6b8205ce12d77ff463_133/explore?location=-33.913601%2C18.654700%2C9.65)
- Van Deventer, H., Smith-Adao, L., Mbona, N., Peterson, C., Skowno, A., Collins, N.B., Grenfell, M., Job, N., Lötter, M., Ollis, D., Scherman, P., Sieben, E. & Snaddon, K. (2018). *South African National Biodiversity Assessment 2018: Technical Report. Volume 2a: South African Inventory of Inland Aquatic Ecosystems (SAIIAE). Version 3, final released on 3 October 2019*. Council for Scientific and Industrial Research (CSIR) and South African National Biodiversity Institute (SANBI): Pretoria, South Africa. Report Number: CSIR report number CSIR/NRE/ECOS/IR/2018/0001/A; SANBI report number <http://hdl.handle.net/20.500.12143>.
- Harris, L.R., Holness, S.D., Sink, K.J., Majiedt, P. & Driver, A. (2022). *National Coastal and Marine Spatial Biodiversity Plan, Version 1.2 (Released 12-04-2022): Technical Report*. South Africa.
- Le Maitre, D.C., Seyler, H., Holland, M., Smith-Adao, L.B., Nel, J.L., Maherry, A. & Witthüser, K.. (2018). *Identification, Delineation and Importance of the Strategic Water Source Areas of South Africa, Lesotho and Swaziland for Surface Water and Groundwater*. Water Research Commission (WRC) Report No TT 754/1/18. Pretoria, South Africa: WRC.
- Nel, J.L., Maherry, A.M., Petersen, C.P., Roux, D.J., Driver, A., Hill, L., van Deventer, H., Funke, N., Swartz, E.R., Smith-Adao, L.B., Mbona, N., Downsborough, L. & Nienaber, S. (2011). *Technical Report for the National Freshwater Ecosystem Priority Areas project*.
- Van Niekerk, L., Adams, J.B., Lamberth, S.J., Mackay, C.F., Taljaard, S., Turpie, J.K., Weerts, S.P. & Raimondo, D.C. (2019a). *South African National Biodiversity Assessment 2018: Technical Report. Volume 3: Estuarine Realm*. CSIR report number CSIR/SPLA/EM/EXP/2019/0062/A. South African National Biodiversity Institute, Pretoria. Report Number: SANBI/NAT/NBA2018/2019/Vol3/A. <http://hdl.handle.net/20.500.12143/6373>.
- Van Niekerk, L., Adams, J.B., Lamberth, S.J., Turpie, J., MacKay, C.F., Sink, K. & Skowno, A.L. (2019b). Chapter 8: Ecosystem Threat Status and Protection levels. In *South African National Biodiversity Assessment 2018: Technical Report. Volume 3: Estuarine Realm*. Pretoria, South Africa: South African National Biodiversity Institute.
- Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. (2017). *The Western Cape Biodiversity Spatial Plan Handbook*. Stellenbosch: CapeNature.
- SANBI. (2019). *National Biodiversity Assessment 2018: The status of South Africa's ecosystems and biodiversity. Synthesis Report*. Pretoria: South African National Biodiversity Institute, an entity of the Department of Environment, Forestry and Fisheries.
- SANBI. (2024). *What is a KBA Map? SANBI Factsheet series*. South African National Biodiversity Institute, Pretoria.
- Sink, K.J., van der Bank, M.G., Majiedt, P.A., Harris, L.R., Atkinson, L.J., Kirkman, S.P. & Karenzi, N. (2019). Volume 4: Marine Realm. In *South African National Biodiversity Assessment 2018 Technical Report*. Pretoria: South African National Biodiversity Institute.
- Skowno, A.L., Raimondo, D.C., Poole, C.J., Fizzotti, B. & Slingsby, J.A. (2019). National Biodiversity Assessment 2018, Volume 1: Terrestrial Realm. In *South African National Biodiversity Assessment 2018 Technical Report*. Pretoria: South African National Biodiversity Institute.
- South African KBA NCG. (2024). *South African KBAs 2024*. Shapefile was produced by the South African KBA NCG and is available from the South African National Biodiversity Institute.
- South African National Biodiversity Institute (SANBI). (2020). *Species Environmental Assessment Guideline. Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa. Version 2.1 2021*. Pretoria: South African National Biodiversity Institute.

