



APPENDIX M1

Pre-application Public Participation Comments and Responses Report

The Proposed Granger Bay Precinct Development at the V&A Waterfront

DEA&DP REF: 16/3/3/6/7/2/A7/4/3071/25

VERSION: DRAFT

DATE: 15 January 2026

PREPARED FOR

V&A Waterfront Holdings Pty (Ltd)



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DOCUMENT DETAILS

THE PROPOSED GRANGER BAY PRECINCT DEVELOPMENT AT THE V&A WATERFRONT: PRE-APPLICATION PUBLIC PARTICIPATION COMMENTS AND RESPONSES REPORT

APPLICANT

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Report purpose

This Comments and Responses is prepared in accordance with the NEMA EIA Regulations (Regulation 41). The purpose of the Comments and Responses Report is to:

- Capture comments/ concerns raised by registered I&APs and Organs of State
- Respond to the comments submitted
- To facilitate informed decision-making

Authors

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VERSION HISTORY

Date	Version
10 November 2025	Draft 1

COMMENTS AND RESPONSES REPORT FOR PRE-APPLICATION PUBLIC PARTICIPATION: COMMENT PERIOD BETWEEN 31 JULY 2025 AND 01 SEPTEMBER 2025

Comments were received from the following organs of state:

- DEA&DP
- DFFE – Oceans & Coasts
- HWC
- SANParks
- City of Cape Town
 - Spatial Planning and Environment: EMD: Environment & Heritage Management – Maurietta Stewart
 - Heritage Management - Berendine Irrgang
 - Coastal Management - Darryl Colenbrander
 - Urban Planning & Design - Margaret Murcott
 - Biodiversity Management - Charmaine Oxtoby
 - Water & Sanitation - Chanee Johnstone
 - Electricity Generation and Distribution - Leona Liebenberg

Comments were received from the following I&APs:

- | | |
|---|---|
| <ul style="list-style-type: none"> • Andre de Wet • Antonio Theron • Anya Ponton • Burkhard Blum (Woodbridge Island Body Corporate) • Carlo • Caroline Marx • Colleen Zsulich • Dave Hudson • Gundo Tshamano • Janine Greeff • Jerome Alexander • Josh Sarembock • Kyle Kahn • Michael Kavanagh (49er dinghy sailors) | <ul style="list-style-type: none"> • Naas Viljoen • Nicholas Bizos • Ntando Mehlomakhulu • Peter Ridgway (Oceana Powerboat Club) • Renee Mendelow • Robin Tindall • Sally Burningham • Selwyn Jacobson (The Waterclub) • Sinalo Mkaza • Solly Heyns • Tom Donaldson • Abdullah Saleem |
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Table 1: Comments and Responses Table

Date	Method	Name	Interest	Comment / Query	Response
2025/07/31	Website	Ntando Mehlomakhulu		<p>I respectfully request to register as an I&AP for the Granger Bay precinct rezoning and redevelopment proposal.</p> <p>While this development could enhance public access to the waterfront and strengthen coastal amenities, I am concerned about environmental resilience, heritage conservation, and equitable public use.</p> <p>Has the project sufficiently assessed potential impacts of land reclamation and rising sea levels?</p> <p>Are there measures in place to protect marine biodiversity and ensure public spaces remain accessible and visually integrated with the existing V&A Waterfront character? I support responsible development and look forward to further engagement.</p>	<p>We confirm your registration as an I&AP.</p> <p>The concerns regarding environmental resilience and heritage are already partially addressed in the Scoping Report and will be further assessed as part of the Environmental Impact Assessment (EIA) process, over the coming months.</p> <p>Impacts of land reclamation are considered in the Marine Impact Assessment (Appendix D2) and Oceanographic Assessment (Appendix D1) and will also be specifically assessed in a Climate Change Risk Assessment to be conducted as part of the EIA.</p> <p>Consideration of public access and visual impacts forms part of the Heritage Impact Assessment. Marine biodiversity is specifically addressed in both the Marine Impact Assessment and the Marine Mammals Impact Assessment, which were published with the draft Scoping Report.</p>
2025/07/31	Email	Sneha Jhupsee (Heritage Western Cape)		<p>HWC has requested an HIA (HWC25061214SJ0612) for the Granger Bay Development on 25 June 2025.</p> <p>HWC will provide a comment once received.</p>	<p>We acknowledge the requirement for a Heritage Impact Assessment, a draft of which will be published with the Draft EIA Report for consideration by both heritage resources authorities.</p>
2025/08/01	Email	Janine Greeff	I follow building and construction related projects from conceptual / feasibility up until completion.	<p>I hope you are well. I came across a newspaper notification for "proposed Granger Bay Precinct Development at the V&A Waterfront" I do not have any objections but would like to please be registered as an interested party.</p>	<p>It is noted that you have no objection to the project.</p> <p>We confirm your registration as an I&AP.</p>
2025/08/01	Website	Sally Burningham		<p>Please advise where the additional sewage is going</p>	<p>Sewage generated during the operational phase of the project will in the short term be directed to the Green Point outfall, until a new wastewater treatment plant</p>

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					planned by the V&A Waterfront is commissioned. The availability of sufficient unallocated capacity at the outfall has been confirmed by the City of Cape Town.
2025/08/01	Website	Colleen Zsulich		<p>To Whom It May Concern,</p> <p>I am writing to express my concern regarding the proposed development around the Waterfront area.</p> <p>My primary concern is the already overwhelmed traffic infrastructure in this part of Cape Town. Realistically, how is the area expected to cope with further development when access is already severely strained? On any given day—especially during events at the stadium or peak tourist periods—the congestion is unbearable. The bottleneck created by the current road network makes the entire precinct feel saturated, as though all of Cape Town is trying to move through one small corridor.</p> <p>It is difficult to imagine how additional development would not compound this problem. Surely there are alternative areas, perhaps on the other side of the Waterfront, where development could be encouraged without putting further pressure on an already fragile traffic system.</p> <p>I urge you to consider the long-term livability and accessibility of this area before approving further development.</p>	<p>Transport concerns are acknowledged, and will be assessed and responded to in a Transport Impact Assessment forming part of the EIA.</p> <p>Event-related traffic associated with the stadium is managed in terms of the Event Traffic Management Plans required by the City of Cape Town.</p>
2025/08/02	Website	Sinalo Mkaza	Business opportunities and also personal as a resident in the precinct	What are the considerations around mixed use of trading opportunities for small and medium sized enterprises?	<p>We acknowledge your comment, but this is not assessed as part of the EIA process.</p> <p>The proposal is currently at a high level, conceptual stage, however it will include a mix of uses. Although the development will be mainly residential, it is the intention of the applicant to provide opportunities for small and medium enterprises on the site.</p>
2025/08/02	Website	Robin Tindall		We run a long standing premier open ocean paddling event from Oceana. We are needing information about how we will be accommodated during construction and once the project is complete.	The proposed development includes a new slipway to replace the existing slipway, and new sheltered public waters in the proposed bay. Access to a functioning slipway is expected to be retained throughout the construction process, by constructing a new slipway before the closure of the existing one.

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2025/08/03	Website	Jerome Alexander		Has wave refraction study been done to ensure the surf is not affected at the surf break thermopolyae?	A Wave and Hydrodynamic Modelling Study was undertaken by PRDW for the proposed site and confirms that no impacts on waves are anticipated at a distance of more than 500 metres from the site in a northeasterly direction, and that the Thermopylae surf break is not expected to be affected. Refer to Appendix G .
2025/08/04	Website	Andre de Wet		Great Project	We acknowledge your support for the proposed development.
2025/08/04	Website	Peter Ridgway	I am a member of Oceana Powerboat Club and regularly trailer launch my wooden sailing vessel Julia from OPBC slipway.	<p>There is no other public access to Table Bay for my family and I and friends at a low cost. The club provides a secure and safe access to the sea for us and secure parking for my vehicle and trailer. Any further development of Granger Bay will destroy the unique family environment and camaraderie that exists between ocean users of all types that are welcome.</p> <p>Access to Granger Bay and Table Bay for my family, friends and I to sail our 5.75m traditional wooden sailing lugger Julia using OPBC has been an enjoyment we have been privileged to experience for the last 5 years at relatively small annual membership fee cost and easy secure unfettered access. Even at busiest times in Cape Town, as a local family we can access Table Bay and sail around Robben Island and enjoy the beauty of the abundant sea life most of the year, free from commercialised access hurdles. We love our club and it family atmosphere without the commercialised influence of the Waterfront. Please don't destroy the last local access to the sea, free of commercialised rubbish aimed at tourists with lots of resources we don't have.</p>	<p>The proposed development includes a new slipway to replace the existing slipway, and new sheltered public waters in the proposed bay. Access to a functioning slipway is expected to be retained throughout the construction process, by constructing a new slipway before the closure of the existing one.</p> <p>The existing slipway is managed by the Oceana Power Boat Club, a private entity. Institutional considerations regarding the management of the new slipway have not yet been confirmed.</p>
2025/08/04	Website	Michael Kavanagh		Hi Team, our 49er dinghy sailors are training with a view to representing South Africa at the Olympics. While they can access the water from Oceana Powerboat Club at the moment, there is no boat parking on the shore. To unpack and rig the boats takes around 2 hours. After sailing it is another 2 hours to pack up and trailer the boats. We are in desperate need of a sailing centre, with secure storage for sailing boats (preferably mast up), coach boats, changeroom / shower facilities and a training room for briefing and debriefing. The redevelopment of this area is a once in a lifetime opportunity	The request for additional sailing storage and other facilities will be relayed to the applicant. Accommodation of such facilities will be explored at the more detailed planning stage.

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				to build a world class fit for purpose facility. Kindly consider this request in your development plans.	
2025/08/05	Website	Nicholas Bizos	Neighbour to the proposed development	The intended development within the current Waterclub grounds will impact meaningfully on the current views, noise levels and privacy of the residents of the Waterclub, and particularly the owners and residents of the Dover and Elstree buildings.	The impacts on the Water Club residents will be specifically considered in the Visual Impact Assessment to be published with the EIA Report. These matters are also the subject of ongoing engagements between the applicant and neighbouring residents.
2025/08/10	Website	Antonio Theron		<p>The project could impact sensitive marine ecosystems like the Cape Kelp Forest and vulnerable species such as Heaviside's dolphin and West Coast rock lobster through disturbance during construction and operation.</p> <p>Noise, vibrations, and permanent habitat changes from land reclamation and breakwaters are concerns, along with increased vessel traffic and altered ocean currents in Table Bay.</p> <p>Socio-economic effects include possible displacement of site users, changes in tourism, and both positive job creation and negative recreational losses.</p> <p>Recreational activities may be restricted, and visual impacts could affect tourism appeal.</p> <p>Heritage sites may also be at risk.</p> <p>Transport patterns might change with higher parking demand, while construction could cause pollution and waste issues.</p> <p>Although public coastal access aims to improve, some areas may become restricted. Proximity to protected zones like Robben Island requires careful environmental compliance</p>	<p>These concerns are addressed in the following existing specialist studies, and will also be included in the EIA report:</p> <ul style="list-style-type: none"> • Marine Impact Assessment (Appendix D2) • Socio-economic Assessment (Appendix D3) • Heritage Impact Assessment (in progress) • Transport Impact Assessment (in progress) <p>Please refer to the stated appendices to the Scoping Report, as well as to the preliminary identification of impacts set out in the Draft Scoping Report.</p>
2025/08/11	Email	Anya Ponton		As requested, the email below and attachments have been immediately forwarded to all registered owners. Kindly note that it is not acceptable that the indicative date of 1 September allows a fair and reasonable opportunity to comment. The Waterclub Residential Homeowners Association is taking advice and will respond in due course.	An email response was provided on 11 August 2025 confirming the EAP's willingness to extend the pre-application commenting period on reasonable request and noting there would be additional public participation opportunities in future.

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2025/08/11	Website	Josh Sarembock		I'd like to get in touch regarding opening a restaurant bar once development spaces are available. As one of the top cocktail bars in the Middle East and Africa it would make for a great destination for locals and tourists alike.	This is not addressed as part of the EIA process, but this has been forwarded to the applicant for consideration. The proposal is currently at a high level, conceptual stage, however it will include a mix of uses, including restaurants. Availability of such spaces will be made known to the public and business community in due course.
2025/08/13	Open Day	Tom Donaldson		Kindly note that it is not acceptable that the indicative date of 1 September allows a fair and reasonable opportunity to comment. The Waterclub Residential Homeowners Association is taking advice and will respond in due course.	This concern is noted. 30 days is the standard length of a commenting period under the National Environmental Management Act and the EIA Regulations, but this is only the first of at least three public participation comment periods and there will be further opportunities to give input. Furthermore, there is ongoing engagement between the applicant and neighbouring residents on aspects of the proposed development.
2025/08/13	Open Day	Gundo Tshamano		It is a great project. It will be quite interesting to see how it unfolds and comes to fruition. Thank for the environmental considerations. Can not wait to see it happening. Good luck. Thanks for giving the public an opportunity to add input it is greatly appreciated. Good luck. May you have a blessed peaceful and productive day further. Thank you for including me and taking your time to unpack this it is greatly appreciated.	Your support for the proposed development is acknowledged.
2025/08/18	Email	Carlo		Hi, Please can you kindly provide the contact details and process for the Public Participation of the proposed development. Please confirm is this for the reclamation or for the entire development	A response was provided via email on 25 August 2025 confirming Public Participation dates, details and the scope of the proposed development.
2025/08/20	Website	Selwyn Jacobson	I need to declare a business, financial, personal or other interest in the approval or refusal of the application	The WRHOA owns property - erven 1948, 1950 and 1951, Green Point, Cape Town, which erven are situated directly adjacent to Erf 173712 and a portion of Erf 149294, Granger Bay Precinct, Cape Town. The nature of the interest of the WRHOA is therefore business and financial as the stated properties will be materially negatively affected by the proposed future developments on Erf 173712 and a portion of Erf 149294, Granger Bay Precinct, Cape Town.	Your concern in relation to property value is noted and is considered in the Socio-economic Impact Assessment Other potential impacts on the surrounding property owners are addressed in the Scoping Report.

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2025/08/20	Website	Naas Viljoen		As a taxpayer in the Cape Peninsula, I support the development in Granger Bay	We acknowledge your support for the proposed development.
2025/08/22	Website	Kyle Kahn		<p>The granger bay area is underutilised and a clever development including land reclamation is a good idea, however the draft diagrams presented seem to have been prepared without taking into account the predominant swell and wind direction of the area or the frequency and extreme violence of Cape storms. There are many examples of failed projects when highly qualified engineers underestimate the power of the sea and an apt example for the Granger Bay project would be the failed concrete works of the water exchange at Koeberg nuclear power plant. Also the OPBC small harbour and the Yzerfontein small harbour are examples of failed projects because of the severe surges experienced at those site. The primary purpose (and indeed the very definition) of a harbour is safety for vessels. Creating a marina/harbour that can only be used safely when the weather is mild is actually an increase of risk for mariners who have put to sea in less than ideal conditions, e.g. fishermen and water sportsmen.</p> <p>Also, seeing as the construction will include massive breakwaters, it would be very advantageous if those breakwaters created/improved the creation of waves that are rideable by surfers. Many companies in the world have and are spending \$billions on creating wave pools to attract tourism, whereas the Granger Bay project could rather just take advantage of the naturally occurring swells at the existing site and ensure that the breakwaters enhance the wave creation, rather than destroy it.</p>	<p>According to the Oceanographic specialist (Appendix D1), the development is not a typical marina where breakwaters would be designed for the least wave penetration. The eastern side of the development has a breakwater that provides sufficient protection for boats to be launched, similar to conditions on the existing OPBC slipway. The western breakwater is more of a feature than a breakwater. It provides for pools and amenities for recreational activities other than boating.</p> <p>The Oceanographic Impact Assessment (Appendix D1) has been based on a Wave and Hydrodynamic Modelling Study by PRDW (Appendix G), which is available for public review and comment in the Scoping Report.</p> <p>The designs are based on extensive numeric modelling which takes into account all aspects of the current and projected future coastal processes. Further details are included in the PRDW report (Appendix G). A full three-dimensional physical model study at a scale of 1:45 was also undertaken to further validate the design.</p> <p>The proposed site is fairly sheltered from the natural swells and creation of new surf breaks in this area is not feasible. No impacts on wave heights are anticipated at a distance of 500 m from the site.</p>
2025/08/23	Email	Solly Heyns		Dear Infinity Environmental Team, I am writing in my capacity as a shareholder at H-Jetty in Granger Bay Marina, which is one of the most exposed areas of the marina basin. Given the importance of this development, it is vital that all stakeholders understand the potential impacts on wave motion, surge, sediment, and marina infrastructure before construction proceeds. As a shareholder at H-Jetty in Granger Bay Marina, I would appreciate clarification on how the proposed marina works will affect surge and wave motion inside the basin, as well as the potential effects of silt accumulation. Please share the hydrodynamic modelling results for all storm conditions,	<p>Anticipated impacts on the Granger Bay Marina are assessed using numerical modelling in the Wave and Hydrodynamic Modelling Study by PRDW, which is available for public review and comment in the Draft Scoping Report (Appendix G). The effect of the breakwaters on Granger Bay Marina is specifically included in the assessment.</p> <p>The wave height inside the Waterclub is projected to be slightly reduced by the development. Modelling of the existing situation predicts longer-term mud accumulation</p>

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				<p>comparing existing and post-development scenarios, and confirm whether a sediment transport or siltation study has been undertaken.</p> <p>We would also like to understand the expected impacts on the existing breakwater and marina infrastructure, including any changes in</p> <ul style="list-style-type: none"> • Wave climate and overtopping • Reflected wave energy • Scour around structures • Sedimentation and siltation patterns <p>This information is essential to ensure there is a clear and transparent understanding of how the proposed development may influence conditions at Granger Bay Marina, and specifically at H-Jetty. Thank you for your attention to this request. I look forward to your detailed technical response.</p>	<p>within the entire inner area of the Waterclub, except for the entrance and some localised areas of scour induced by strong currents due to harbour resonance. This result is consistent with bathymetric surveys of the Waterclub and historical dredge records, which indicate that periodic maintenance dredging of the Waterclub has been required. The proposed development is not expected to result in significant changes in mud accumulation beyond 300 m north of the development, and will have no significant impact on the bed shear stresses in the Waterclub, thus no additional mud accumulation and no additional volume of maintenance dredging is predicted for the Waterclub.</p> <p>According to the Oceanographic Specialist Study (Appendix D1), there will be no effect on overtopping.</p> <p>Although some wave reflection occurs off the western breakwater, wave height comparisons with and without the development show a slight reduction in wave heights within the Waterclub due to the development. This is likely due to more wave energy reflecting into the Waterclub from the existing V&A rock revetments.</p> <p>Since both wave heights and currents within the marina are slightly smaller with the development, scour around structures is expected to reduce.</p> <p>Wave modelling includes short (shorter than 20 s) and long waves (longer than 20 s). PRDW's report provides plots for the total wave height (combined long and short waves) for three wave conditions:</p> <ul style="list-style-type: none"> • 1 month return period storm in summer • 1 month return period storm in winter • 1 year return period storm <p>The wave heights with and without the development are provided in the report, showing wave height contours at 0.25 m increments. These indicate that wave heights with and without the development are similar with some</p>

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					areas showing a slight decrease in wave height with the development.
2025/08/25	Email	SANParks		<p>1. SANParks has considered the Pre-Application Draft Scoping Report for the proposed Granger Bay Precinct development and associated land reclamation at the V&A Waterfront, as advertised on the project website and through public participation notices.</p> <p>2. As the proposed development falls within the buffer area of the Table Mountain and Robben Island Marine Protected Areas ("MPAs"), SANParks is directly affected and must accordingly be registered as an Interested and Affected Party ("I&AP").</p>	We acknowledge the proximity of the proposed development to the Marine Protected Area and, as such, SANParks was identified as a key Organ of State and is included in the register of I&APs.
				<p>3. Given the sensitive marine environment and the potential for cumulative impacts in Table Bay, SANParks requires that the additional mitigation measures and monitoring programmes outlined below be incorporated into the Environmental Management Programme ("EMPr") and formally included as conditions of the Environmental Authorisation ("EA").</p>	The potential cumulative impacts associated with the proposed development are noted. An Environmental Management Programme will be compiled in the next phase of the process, and it will prescribe control methods to mitigate and manage negative environmental impacts and enhance positive impacts associated with the construction and operation of the development. Additionally, the EMPr will provide a programme for monitoring the performance of personnel in applying such methods.
				<p>4. The Marine Specialist Study identifies that resident Heaviside's dolphins are likely to temporarily emigrate from the site during construction and may or may not return thereafter. Permanent abandonment is considered a medium-significance risk. To address this risk, the following requirements apply:</p> <p>4.1. A formal marine mammal monitoring programme must be compiled as part of the Scoping and Environmental Impact Assessment process, submitted for review and comment by SANParks and other I&APs, and incorporated into the EMPr. Once approved, the programme must be implemented throughout construction and the early operational phase, with the objective of confirming whether dolphins vacate the area and whether they return.</p>	The potential impacts on Heaviside's dolphins are assessed in the Marine Impact Assessment (Appendix D2) and accompanying marine mammals specialist report. A Marine Mammal Monitoring Programme will be included in the EMPr.
				<p>4.2. Monitoring must include both visual surveys (from vantage points and vessels) and passive acoustic monitoring where feasible, with reports submitted to the competent authority and made available to stakeholders on a quarterly basis.</p>	Visual monitoring and passive acoustic monitoring will be considered for inclusion in the EMPr in the EIA Phase, based on the specialist assessment.

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				<p>5. The development will increase impervious surfaces and stormwater flows into Table Bay. Both the Marine and Oceanography studies identify pollution risks, including litter and sediment transport. To mitigate these risks, the following requirements apply:</p> <p>5.1 Litter traps and gross pollutant traps must be installed on all stormwater outlets draining into Table Bay from the development area.</p>	<p>A stormwater management plan will be required as part of the development design, and will provide for solid waste management and sediment removal. These requirements will be specified in the EMPr.</p>
				<p>5.2 A stormwater discharge monitoring programme must be compiled during the assessment process, submitted for review and comment by SANParks and other I&APs, and incorporated into the EMPr. The programme must define monitoring frequency, parameters to be tested, and enforceable thresholds for corrective action.</p>	<p>A stormwater discharge monitoring programme, defining monitoring frequency, parameters to be tested, and enforceable thresholds for corrective action will be included in the EMPr to form part of the EIA Report.</p>
				<p>6. The development will increase public access to adjacent marine areas, including MPAs. To ensure that this increased access does not result in non-compliance with MPA regulations and management provisions, and to minimise associated ecological impacts, the following requirements apply:</p> <p>6.1. Educational signage must be installed at all new launch sites, slipways, and access points, providing information on MPA boundaries, ecological importance, and permitted/prohibited activities.</p>	<p>Requirements for MPA-related signage, providing information on MPA boundaries, ecological importance, and permitted/prohibited activities, will be included in the EMPr..</p>
				<p>6.2 Brochures or digital awareness material (including QR codes) must be provided to promote compliance with MPA rules.</p>	
				<p>7. The Marine Specialist Study highlights risks from underwater noise, pile driving, and rock dumping on fish, invertebrates, seabirds, and marine mammals. To minimise and manage these risks, the following requirements apply:</p> <p>7.1 A detailed noise management protocol must be developed as part of this assessment, incorporated into the EMPr, and circulated for review and comment by SANParks and other I&APs. The approved protocol must be implemented during construction and must include, at minimum: soft-start/ramp-up procedures, seasonal restrictions during periods of peak dolphin presence, and the avoidance of simultaneous noisy activities.</p>	<p>A noise management protocol will be developed and will be incorporated into the EMPr, for review by SANParks during the EIA phase.</p>


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2025/08/26	Email	Dave Hudson	Business, Financial and personal	<p>The members of the Granger Bay Berth Holders Association are all mooring owners who are all concerned about issues like Wave dynamics – What studies have been conducted, by whom, and with what qualifications, on the impact of the altered coastline on Granger Bay Marina's tidal flows across different seasons?</p> <p>This should include the level of flushing and the rate of sedimentation. In relation to the Breakwaters, what influence will the new development have on the rate of degradation?</p> <p>And Marine environmental impacts – What studies have been carried out, by whom, and with what qualifications, to assess the strength of the new sea walls to withstand north-westerly storms?</p> <p>What storm magnitude has been considered?</p>	<p>The Oceanographic Assessments (Appendix D1) were carried out by Enrique Julyan (M.Sc Water Resources Engineering) (Pr.Eng.) of WML Coast Consulting Engineers.</p> <p>The Marine Impact Assessment (Appendix D2) was carried out by Dr Barry Clark: (PhD, Zoology; B.Sc Honours, Marine Biology, Amy Wright: (M.Sc Biological Sciences), Megan Jackson: (M.Sc Botany/ Plant Biology): & Adam Rees: (PhD Marine Science) of Anchor Environmental Consultants.</p> <p>Detailed specialist reports are provided with the Scoping Report.</p> <p>Refer to the above-mentioned reports for detailed studies conducted and stormwater magnitudes considered.</p> <p>Further responses will be provided in the EIA and are included in the PRDW report and updates to the SR.</p>
2025/08/31	Email	Caroline Marx	Milnerton Central Residents Association	<p>1.Potential Coastal Impact</p> <p>The planned land reclamation and associated fortifications could further destabilize the Milnerton shoreline and intensify coastal erosion, particularly around Woodbridge Island and Sunset Beach. Ben Schoeman Docks has a documented history of destabilizing this stretch of coastline. It is likely that the integrity of the Milnerton coastline may be adversely affected, given that comparable impacts have been associated with the nearby Ben Schoeman Dock. Adding a further 500m of hard rock revetment will likely aggravate this. The City of Cape Town has already identified the Ben Schoeman Dock as a contributing factor to the current erosion challenges experienced on Woodbridge Island. In the Milnerton Erosion Response Guideline, published by the City's Environmental and Coastal Management Branch on March 23, 2020, it is stated on page 8 that: "Although not properly understood, the following factors, to varying degrees, are considered drivers to coastal erosion at Milnerton (CSIR, 1972, 1983, 1986,1996,2003):</p>	<p>The proposed land reclamation and breakwaters are not expected to impact on wave heights at a distance of more than 500 metres from the development, as described in the detailed modelling conducted by PRDW and included in the Draft Scoping Report (Appendix G). The proposed development is not expected to impact on longshore sediment transport on the eastern shoreline of Table Bay and is fundamentally different from the construction of the Ben Schoeman dock.</p> <p>Further details are included in the PRDW report appended to the Scoping Report as Appendix G.</p>


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				(...) Construction of the Ben Schoeman Dock, Cape Town Port: the construction of Ben Schoeman dock altered the wave climate in Table Bay which has resulted in Table Bay, particularly in the Milnerton region, finding a new equilibrium through erosive forces."	
				<p>2 It will result in a further 145 kl /day of untreated sewage being pumped into the Marine Protected Area of Mouille Point. The Marine Protected Areas Act specifically forbids dumping into a MPA.</p> <p>On site treatment should be a requirement. Support for the project is contingent on the implementation of a holistic and robust coastal protection plan, including - if necessary - effective mitigation measures to be implemented before the commencement of any land reclamation as well as guarantees that should any further erosion occur along the Milnerton coastline , the developer will be responsible for any and all costs related to any additional measures needed to protect the coast from increased erosion.</p>	<p>The municipality is responsible for wastewater treatment in terms of the Constitution and has confirmed sufficient unallocated capacity in the sewerage network and the Green Point outfall to accommodate the proposed development. The MPA was declared in 2019 and post-dates the establishment of the Green Point outfall in 1993. The City of Cape Town holds a Coastal Water Discharge Permit (CWDP) issued by the Department of Forestry, Fisheries and the Environment (DFFE) in 2022 for operation of the outfall. Therefore, the assertion that the proposal would constitute unlawful dumping into a MPA is inaccurate.</p> <p>In the longer term, it is anticipated that the wastewater may be treated by a new wastewater treatment plant to be constructed by the V&A Waterfront. However, this future plant does not form part of the current application.</p>
2025/09/01	Email	Burkhard Blum	I need to declare a business, financial, personal or other interest in the approval or refusal of the application	<p>The Woodbridge Island Body Corporate, Milnerton is objecting the proposed breakwaters, revetment and land reclamations in the Granger Bay Precinct, V&A Waterfront, Cape Town for the following reasons:</p> <p>1.Potential Coastal Impact The planned land reclamation and associated fortifications could further destabilize the Milnerton shoreline and intensify coastal erosion, particularly around Woodbridge Island.</p>	<p>Your concerns on potential coastal impacts are noted. The proposed development is not anticipated to destabilize the Milnerton shoreline or intensify coastal erosion. The proposed land reclamation and breakwaters are not expected to impact on wave heights at a distance of more than 500 metres from the development, as described in the detailed modelling conducted by PRDW and included in the Scoping Report (Appendix G). The proposed development is not expected to impact on longshore sediment transport on the eastern shoreline of Table Bay, or to impact on the Milnerton shoreline in any way.</p> <p>Further details are included in the PRDW report appended to the Scoping Report as Appendix G.</p>


Date	Method	Name	Interest	Comment / Query	Response
				<p>2. Lack of sufficient Coastal Impact Study / Current 2025 study is insufficient</p> <p>We kindly request that a comprehensive, independent study be conducted with a focus on assessing the potential impact of this project on the Milnerton coastline taking also the long and mid-term effects into account. The “Oceanographic Specialist Study for the Environmental Impact Assessment (EIA) of the Proposed Breakwaters, Revetment, and Mixed Land Use in the Granger Bay Precinct, V&A Waterfront, Cape Town” by WML (dated 29 May 2025) appears to inadequately address the potential hydrodynamic and sedimentological impacts on the Milnerton coastline. Several assumptions made within the study may result in an underestimation of adverse effects and lead to potentially misleading conclusions Some of the key concerns regarding the 2025 study include the following:</p> <ul style="list-style-type: none"> • Section 4.2 concludes that short-period wave reflections dissipate within approximately 500 meters into Table Bay and, therefore, are not expected to influence the Milnerton shoreline. However, the analysis is limited to short-period waves and does not account for the behaviour or energy transmission of long-period wave reflections. Given that long-period (infragravity) waves contain substantially more energy and have longer propagation distances, their potential to reach and impact the Milnerton coast must be explicitly evaluated. Notably, long-wave dynamics are only considered in relation to the Granger Bay Marina (Section 4.3.2) and not in the context of broader Table Bay interactions 	<p>The Oceanographic study states that reflected waves from the new breakwaters will not travel more than 500 meters into Table Bay and will not reach the Bloubergstrand beach or Milnerton beach.</p> <p>Refer to the Oceanographic Study (Appendix D1).</p> <p>Further responses will be provided in EIA and are included in the PRDW report (Appendix G) and updates to the Scoping Report.</p>
				<ul style="list-style-type: none"> • Section 4.5 assumes negligible alteration to the sediment transport regime, based on the presence of a predominantly rocky shoreline near the proposed development. This rationale omits the adjacent sandy shoreline extending northwards from Lagoon Beach, which is inherently more dynamic and susceptible to morphological changes induced by alterations in nearshore wave and current patterns. <p>Furthermore, the analysis does not account for subaqueous sediment features - such as submerged sandbanks - that exhibit mobility in response to wave and current forcing. These features play a critical role in modifying nearshore hydrodynamics and</p>	<p>The Oceanographic Study states that reflected waves from the new breakwaters will not travel more than 500 m into Table Bay and will not reach the Bloubergstrand beach or Milnerton beach. This indicates an assessment of potential impacts on these adjacent sandy areas, concluding that they will not be reached by reflected waves. Refer to the Oceanographic Study (Appendix D1).</p> <p>Further responses will be provided in EIA and are included in the PRDW report and updates to the Scoping Report.</p>


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				<p>can significantly influence patterns of erosion and accretion along adjacent coastlines.</p> <ul style="list-style-type: none"> • Lastly, the model's input data appears to be limited to short-term temporal sampling windows -namely, one-month or six-week periods during both summer and winter seasons. This dataset may be insufficient to capture extreme but episodic conditions that are known to drive coastal erosion along the Milnerton coastline. <p>Specifically, erosive events in this region tend to occur under a specific combination of forcing mechanisms: spring high tides, large south-westerly swells, and strong onshore wind events. These compound events are intermittent and do not necessarily occur on an annual or seasonal basis. As such, reliance on a randomly selected short-term dataset is unlikely to capture the full range of high-energy conditions that could significantly influence shoreline stability.</p> <p>In light of the above, further investigation and refinement of the model inputs and assumptions are recommended to ensure that the potential coastal impacts, particularly on the Milnerton shoreline, are comprehensively assessed</p>	<p>These scenarios were derived using Extreme Value Analysis, described as a robust statistical method. This indicates that while the hydrodynamic simulations ran for six-week periods, the wave models utilized extreme storm conditions defined by statistical return periods, rather than just monthly random sampling. Refer to the Oceanographic Study (Appendix D1) for more details.</p> <p>Further responses will be provided in the EIA and are included in the PRDW report (Appendix G) and updates to the Scoping Report.</p>
				<p>3. Ben Schoeman Docks has an erosive impact on Woodbridge Island</p> <p>It is likely that the integrity of the Milnerton coastline may be adversely affected, given that comparable impacts have been associated with the nearby Ben Schoeman Dock. The City of Cape Town has already identified the Ben Schoeman Dock as a contributing factor to the current erosion challenges experienced on Woodbridge Island. In the Milnerton Erosion Response Guideline, published by the City's Environmental and Coastal Management Branch on March 23, 2020, it is stated on page 8 that: "Although not properly understood, the following factors, to varying degrees, are considered drivers to coastal erosion at Milnerton (CSIR, 1972, 1983, 1986,1996, 2003): (...) Construction of the Ben Schoeman Dock, Cape Town Port: the construction of Ben Schoeman dock altered the wave climate in Table Bay which has resulted in Table Bay, particularly in the Milnerton region, finding a new equilibrium through erosive forces."</p>	<p>The Oceanographic Specialist Study (Appendix D1) states that reflected waves from the new Granger Bay breakwaters will not travel more than 500 m into Table Bay and will not reach the Bloubergstrand beach or Milnerton beach. Refer to the Oceanographic Study (Appendix D1) for further details.</p> <p>Further responses will be provided in the EIA. Refer also to the PRDW report (Appendix G) included with the Draft Scoping Report.</p>

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				Our support for the project is contingent on the implementation of a holistic and robust coastal protection plan, including - if necessary - effective mitigation measures to be implemented by the City before the commencement of any land reclamation. We kindly request to be officially informed and involved throughout all stages of the process, including access to relevant studies, deadlines, opportunities for comment or objection, and updates on mitigation strategies. WBIBC	
2025/09/01	Email	Maurietta Stewart (City of Cape Town – District Head: Table Bay and Tygerberg Districts Environmental and Heritage Management Branch)		<p>3. Environmental and Heritage Comments</p> <p><u>3.1. Environmental Concerns</u></p> <p>3.1.1. Additional bulk of the reclaimed land:</p> <p>The Pre-application Draft Scoping Report (PADSR) states that “Development rights are already in place for a portion of the Granger Bay precinct not included in this Scoping and EIA.” The extent of existing development rights must be indicated spatially on a plan. Development rights are in place for the existing 600000m² bulk pertaining to the existing V&A Waterfront area, and an additional 400000m² bulk is currently sought, which has been confirmed as being located behind the ad hoc setback line, which may suggest that <u>the new area of land reclamation is not included in the additional bulk application or covered by existing rights.</u></p> <p>3.1.2. The extent of the proposed development within the “project site” includes areas for which an additional 400000m² of bulk has recently been applied in a land use application submitted to the City of Cape Town, and for which a rezoning to MU3 was sought, plus departures. In addition, as part of this LUM application, the existing Package of Plans approach for evaluating development proposals for the V&A Waterfront was sought to be replaced with high level Urban Design Guidelines, SDPs and building plans only, in lieu of the Package of plan approach which included Contextual and Development Frameworks, and Precinct Plans preceding the Site Development Plans and building plan submissions. It was stated in the LUM application that none of the area for which the</p>	<p>Applicant's response: The bulk rights for the reclaimed portion have not yet been established as the land is not yet established and has no zoning. The V&AW has existing available rights for the 78 000m² which is the proposed bulk for the EIA site from its total permissible bulk of 613 859m² and which is to be used as the basis for assessment of impacts. For the reclaimed portion of land, a small portion of existing rights has been reserved for that land when and if it eventuates.</p> <p>Applicant's response: This EIA application is independent of the Rezoning in that it illustrates more information on how existing rights could be exercised for assessment purposes related to the proposed coastal protection measures.</p> <p>The additional bulk which forms part of the rezoning application is still in application stage and therefore has no status at the moment. Should this status change, the scoping report will be updated to reflect this accordingly.</p>

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				<p>additional 400 000m² of bulk has been applied is subject to the EIA application, i.e. none of the 400000m² applies to the proposed reclaimed land.</p> <p><u>Land-based area not being reclaimed also the subject of the EIA as per the 'project site' boundaries:</u> The EIA application also now includes areas not being reclaimed which were included in the latest LUM application for an additional 400000m² bulk which stated that none of the area for additional bulk were the subject of the EIA.</p> <p>This is the applicable area depicted on the LUM rezoning application in blue, part of which overlaps with the project site, and excludes all areas to be reclaimed:</p>  <p>Fig.1: Plan showing proposed rezoning areas to Mixed Use 3 in blue, to accrue bulk of 440000m² in addition to underlying existing and unutilised bulk (of 600000m²), which excludes any proposed reclaimed areas, as per the LUM application Case ID: 1500109534.</p> <p>Please provide clarity as the EIA 'project site boundaries' include areas for which additional bulk has been applied for to the City of Cape Town.</p>	<p>Applicant's response:</p> <p>The two processes, EIA and Rezoning need to be processed and assessed separately. There is reference to an existing rezoning application which does not state that none of the area for which the additional bulk has been applied is subject to an EIA. What is stated in the LUM application is that "the rezoning application does not include any land beyond the V&A's existing cadastral boundary." It also stated that: "following the submission of an Applicability Checklist to DEA&DP (Reference Number: 16/3/3/6/1/A7/4/3129/23., DEA&DP determined that no listed activities in terms of the NEMA EIA Regulations, 2014 (as amended) were triggered by the proposed rezoning and application for additional bulk." The rezoning on its own does not trigger an environmental assessment.</p> <p>The application before DEA&DP is that of the Environmental Impact assessment for Granger Bay study area. As mentioned previously DEA&DP have stated that no listed activities are triggered by an administrative process of rezoning.</p> <p>The two processes are quite different. The Rezoning application is for the existing V&A Waterfront boundary area. It is an administrative process, and is separate from this EIA process</p>
				<p><u>Package of Plans approach:</u> Although stated in the PADS that the Development Zone and associated Package of Plans</p>	<p>The additional bulk which forms part of the rezoning application is still in application stage and therefore has</p>

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				<p>approach to planning apply to the proposed Project Area, this planning mechanism is proposed to change as per the V&A Waterfront's LUM submission.</p>  <p>Figure 3—1: Locality Map of the proposed development</p> <p>Fig.2: The Project Site boundaries include unreclaimed areas, i.e. land based areas, included in the current LUM application for additional 400 000m² of bulk, ostensibly not covered by the EIA (according to the V&A Waterfront LUM application 1500109534). Compare with the boundaries to which the LUM application is applicable in Fig. 1 above.</p> <p>Clarity and perhaps a legal opinion should be sought with regard to the issues raised above, regarding the existing bulk register for the V&A Waterfront, the requirements of the various agreements with the V&A Waterfront Company and the City of Cape Town, the latest LUM additional bulk application, the requirements for the Package of Plans Approach as the planning mechanism, and DEADP's requirements for the project site to which the EIA applies.</p> <p><u>Oceana Power Boat Users:</u> It will be important to ensure environmental justice is pursued so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and</p>	<p>no status at the moment. Should the V&A's zoning change during the course of EIA application, the scoping report will be updated accordingly.</p>
				<p><u>Oceana Power Boat Users:</u> It will be important to ensure environmental justice is pursued so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and</p>	<p>The Draft Scoping Report acknowledges the concerns regarding environmental justice, equitable access to environmental resources, and continued access to a public launch site and slipway, as follows:</p>

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				<p>disadvantaged persons. This is particularly important regarding the continued boat access via the slipway for the Ocean Power Boat users. This principle, in conjunction with the principle of equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing must be pursued, and special measures may be taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination.</p>  <p><small>Fig.3: Aerial photograph 2025 showing the Oceana Power Boat site with large parking areas for vehicles with boat trailers, plus access to the slipway for boat trailers.</small></p> <p>Please note the number of parking bays for boat trailers, and visitors, and the slipway and mooring jetty. The currently available parking and social facilities at the club, must not be diminished in any way, or access prevented through payment / affordability or any other barriers to access for current and potential users.</p>	<ul style="list-style-type: none"> • scheduling construction outside peak boating seasons, • maintaining temporary access routes and berthing, and • communicating the construction schedule in advance <p>The slipway will be reconstructed and will remain a public slipway. Details of the operational management of this facility will be considered by the applicant to ensure continued accessibility and provision for maintenance and upkeep.</p> <p>The public slipway and launch site are to be retained, along with ancillary facilities (parking, etc.) necessary to their function. Privately owned and operated club facilities do not form part of the public launch site, and it is at the applicant's discretion in what form this will continue with the new slipway.</p>

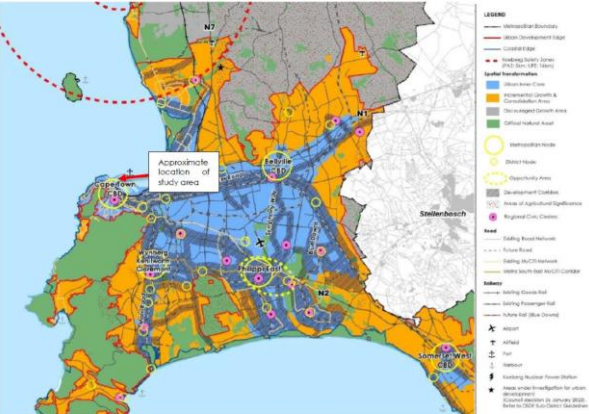
Date	Method	Name	Interest	Comment / Query	Response
				 <p data-bbox="987 531 1292 544">Figure E0-2: Proposed land uses and public amenities.</p> <p data-bbox="819 555 1464 639">Fig.4: From pg5/186 (Draft SR): The proposed slipway and boat trailer parking areas are not indicated on the drawing for the Oceana Power Boat Club.</p>	<p data-bbox="1491 252 2074 432">The proposed slipway is shown in the drawings, as indicated here. Boat parking and related ancillary facilities will be included in more detailed drawings in the EIA Report. A distinction should be made between the public facility (the slipway and launch site) and the current operational management arrangements with a private club.</p>
				<p data-bbox="819 651 1464 730">3.1.4 The scale and layout of the mixed-use development should be designed in such a way as to avoid coastal shadowing caused by tall buildings.</p>	<p data-bbox="1491 651 2074 730">The proposed design does avoid coastal shadowing caused by tall buildings, given the setbacks and height restrictions in the coastal precinct.</p>
				<p data-bbox="819 743 1464 823">3.1.5 Access to the coastline must be maintained and improved and such access must be free of charge to the members of the public.</p>	<p data-bbox="1491 743 2074 1002">Access to the coastline is a key principle of the development as well as being a legal requirement. The development plans include a new coastal public walkway and a landscaped promenade which allow for an uninterrupted coastal boardwalk from the V&A Waterfront through Granger Bay to connect via Beach Road with the Sea Point Promenade. This will be available to the public in the same way that the other public areas in the Waterfront are open to the public.</p>
				<p data-bbox="819 1018 1464 1185">3.1.6 Ancillary infrastructure (parking areas, open spaces and pedestrian pathways) must be of appropriately landscaped with a mixture of coastal and wind tolerant vegetation. Landscape plans will need to be submitted before building plan approval can be granted. Refer to the City's Landscape Plans Guideline for further details - link</p>	<p data-bbox="1491 1018 2074 1161">These requirements will be considered for inclusion in the EMP. It is noted that landscape plans are likely to be a requirement of the building and development management approval process and need not be detailed at this stage of the design process.</p>
				<p data-bbox="819 1201 1464 1281">3.1.7 There has been a lack of new affordable rental supply in the Cape Town CBD, and an oversupply of upmarket apartments or units targeting higher income groups</p> <p data-bbox="819 1321 1464 1401">To provide economic opportunities to a wider range of economic groups, the applicant should provide residential options that cater to a variety of income groups. This aspect is</p>	<p data-bbox="1491 1201 2074 1281">A variety of residential options is proposed, including affordable rental units as defined in the Cape Municipal Spatial Development Framework (MSDF, 2023)</p> <p data-bbox="1491 1321 2074 1369">As indicated, the coastal walkway and breakwaters, as well as landscaped squares are publicly accessible.</p>

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				<p>to be addressed in the "need and desirability" component of the environmental impact assessment.</p> <p>Clarity is also required on how the proposed residential provision will balance the need for public access and amenity value in terms of the 'public good' (as required by ICMA) with privacy and security concerns.</p>	<p>Privacy and security aspects of residential development will be addressed at the detailed design stage.</p>
				<p>3.1.8 Areas of the coast (including reclaimed land) should be provided for sea birds for roosting, given that the structure extends into the marine environment. Bird deterrents (such as flashing mirrors, lasers, et.) should not be used to deter birds from roosting on buildings or structures on the reclaimed land as far as possible.</p>	<p>There is not currently any significant roosting habitat for birds along this section of the coastline, which is currently protected by a rock revetment. This may be attributed to high traffic and the highly transformed nature of the site which discourage foraging and roosting.</p> <p>The Marine Impact Assessment (Appendix D2) included with the Scoping Report considers impacts on all marine species, including seabirds.</p> <p>The feasibility of the proposed restrictions will be considered and responded to in the EIA.</p>
				<p>3.1.9 Provide a list of marine species, including seabirds, and indicate how they will be impacted and impacts mitigated and what benefits to their environment will be created.</p>	<p>Please refer to the Marine Impact Assessment (Appendix D2) for a list of marine species and an assessment of how they will be impacted, with mitigation measures where relevant.</p>
				<p>3.1.10 Diagrams required: The reclamation and infrastructure of the 3.2ha reclamation will be on and below the seabed. Diagrams must be provided showing sections and elevations of the proposed infill across the site, relative to the existing coastline and seabed. Provide a profile of the seabed existing vs proposed and how the different ecosystems of Cape Kelp Forest and Cape mixed shore will be affected by land reclamation and construction activities.</p>	<p>Please refer to the Marine Impact Assessment (Appendix D2) for a description of the marine ecosystems likely to be impacted, including the Cape Kelp Forest and Cape Mixed Shore.</p>
				<p>3.1.11 Water quality: Given the proximity of Granger Bay to the Mouille Point Sewage Outfall, water quality testing must be conducted on a daily basis to ensure that the water quality in the newly created bay is safe for swimming and recreational water use.</p>	<p>Modelling confirms that the proposed bay is expected to have acceptable circulation and flushing. The need for water quality monitoring is supported, but daily monitoring does not align with the existing monitoring frequency implemented by the City of Cape Town along its coast (biweekly or monthly) or the requirements of the national Recreational Water Quality Guidelines (2012), which are typically for monitoring and a risk-based determination based on long-term data. Daily water</p>

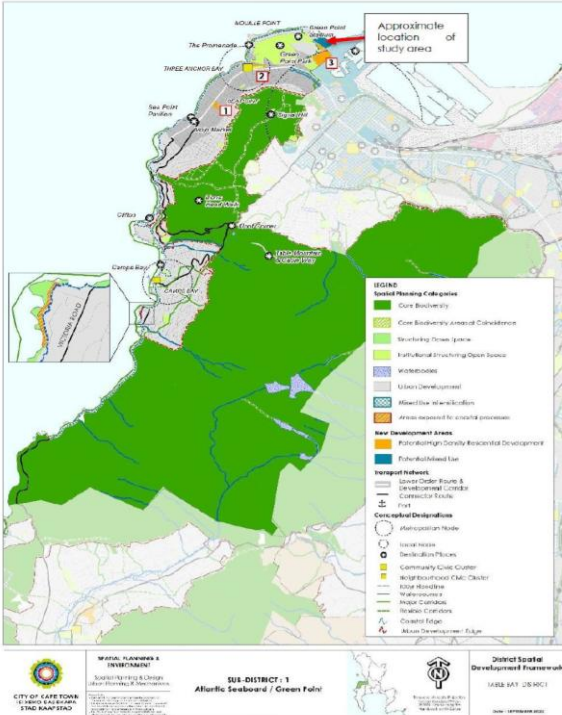
Date	Method	Name	Interest	Comment / Query	Response
					quality testing is not meaningful in the context of recreational water quality, as laboratory tests take between two and three days to complete. Water quality monitoring along the coastline will remain the responsibility of the local authority.
				3.1.12 Additional Sewage discharge directed to Green Point Marine Outfall: Although the document states that the sewage from the proposed additional bulk will discharge to the Green Point Marine Outfall, in discussions with the applicant and the City of Cape Town over the last couple of years, they proposed to deal with sewage and recycling waste water for toilet flushing, etc., on site using appropriate environmental technology. Please investigate these options so as not to add additional sewage to the Green Point Marine Outfall where it discharges into the marine environment.	The applicant is progressing designs for a Wastewater Treatment Plant at the Waterfront which will in future accept sewage flows from the proposed development. In the interim the existing sewer network will be used, and the City of Cape Town has confirmed that the existing sewer conveyance network and the marine outfall have sufficient capacity to accommodate the proposed development.
				3.1.13 Alternatives: In the design alternatives, please ensure that sufficient boat trailer parking and jetty access, plus space for the clubhouse, in addition to the proposed slipway, is provided for the Oceana Power Boat Club to be accommodated, given the social and heritage significance of accommodating the small-scale fishermen with a sheltered slipway from Table Bay and the activity and interest these activities bring to Table Bay.	There is a distinction between the use of the slipway as a public access to the water and the private entity which currently manages it (OPBC). The slipway will be reconstructed and remain a public slipway. Details of the lease and management of this facility will be considered and confirmed by the applicant to best ensure its management, maintenance and accessibility.
				3.1.14 Environmental Strategy: In catering for the Oceana Power Boat Club needs and desires, and to accommodate small scale fisher people, some of whom are a vulnerable group, from communities forcibly removed from Cape Town during apartheid, the Environmental Strategy provides guidance. In terms of the Principles and Directives of Equity and Accessibility, "The natural environment is a shared asset, held in trust for the common good of all, including future generations. However, the legacy of historical inequity and inequality has led to a significant disparity in access to ecosystem goods and services as well as natural open space and the social, educational, spiritual, and recreational opportunities it provides. In taking decisions, operating and planning for the future, equitable access will be promoted, with an enhanced focus on the needs of vulnerable groups and improving living environments. The City will protect the right of all people to fair	Access to the slipway currently requires payment of a fee or membership of the club. As noted above, the applicant will consider the operational arrangements for the public slipway to best ensure its management, maintenance and accessibility.

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				<p>and equitable access to environmental assets, ecosystem goods and services and environmental benefits; the city will manage its environment at all times in the best interests of all, and not to the sole benefit or interest of specific individuals or groups; promote improved access by all citizens to safe, well maintained, and protected natural areas and public open spaces, such as parks, ... beaches and coastal areas, and ensure that the needs of vulnerable groups are considered; and in all decisions related to development or land use change, ensure that "land use changes and development approvals do not hamper equitable access to the environment; and planning and implementation of multi-functional and multi-beneficial open spaces are prioritised within the context of enabling spatial transformation."</p> <p>In this regard boat trailer parking must be accommodated appropriately and affordably on the site, so that affordability does not become a barrier to access the slipway.</p> <p>Further detail drawings are required to confirm accessibility and impacts on vulnerable groups.</p>	
				<p>3.1.15 <u>Potential mitigation measures:</u> Ensure the dedicated marine mammal observer's role and function is incorporated into the Construction EMP, to determine that whales and dolphins are not within 500m of the site during construction or rock dumping.</p>	<p>The proposed mitigation will be considered by the specialist and included in the EMP as required.</p>
				<p>3.2 Heritage Concerns: Due to the anticipated impacts on heritage resources, a Heritage Impact Assessment (HIA) in terms of section 38(8) of the NHRA (25 of 1999) has been recommended in the NID to HWC. The proposed process is supported, and the Heritage Section of the Environment & Heritage Management Branch awaits the HIA for comment, prior to the submission to Heritage Western Cape, as the part of the required local authority input.</p>	<p>A Heritage Impact Assessment and Visual Impact Assessment will be included with the draft EIA Report for comment prior to submission to Heritage Western Cape.</p>
				<p>4.Conclusion and Recommendations The City therefore welcomes and supports the application in principle, provided that the issues identified above are addressed and clarified to the satisfaction of all departments in the Draft Scoping Report.</p>	<p>The City's support for the application is acknowledged, and the issues raised have been addressed and clarified in the Scoping Report.</p>

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2025/09/01	Email	Darryl Colenbrander: Coastal Management		<p>Detailed wave climate modelling will be required to understand impacts of the reclamation/breakwaters on the surrounding area especially given that wave approach to the precinct is direct during large seas. The following aspects should be specifically considered:</p> <ul style="list-style-type: none"> • Medium to long term impacts on surrounds i.e. Granger Bay infrastructure, port breakwaters, the “bay” between the new western breakwater and eastern breakwater of Granger Bay Marina • Potential impacts of altered wave climate under various oceanographic/climatic conditions on vessels exiting/arriving in new precinct as well as at Granger Bay Marina • Potential impacts of altered wave climate under various oceanographic/climatic conditions within the precinct and how this may impact on recreational use activities, including the use of vessels. 	<p>Wave and hydrodynamic modelling studies were conducted by PRDW, and simulated various storm conditions to assess the potential impacts of the new reclamation and breakwaters. Medium to long term impacts of short and long waves on surrounds were also assessed.</p> <p>Please refer to Appendix G of the Scoping Report for the PRDW study.</p>
				No objection to the development provided that the comments and conditions outlined in the Capacity Report are adhered to (refer to Appendix E).	Comments and conditions outlined in the Capacity Report will be adhered to in the implementation of the development.
				Determination of potential impacts on marine wildlife and cetaceans during construction and mitigation measures required	Potential impacts on marine wildlife during construction were determined and mitigation measures are considered in the Marine Impact Assessment (Appendix D2).
				Determination of pollution impacts during construction on receiving marine environment, and mitigation measures required	Pollution impacts during construction have been assessed and mitigation measures were recommended. Refer to the Marine Impact Assessment (Appendix D2).
				Water quality assessment to test feasibility and suitability of proposed tidal pools for bathing use by the public. This especially on the basis that proposed tidal pools are located within an enclosed precinct (poor circulation) and there are known and often multiple pollution sources that often discharge into the bay via stormwater systems.	Should the (conceptually proposed) tidal pools be constructed these would be a pumped system that is emptied and the water replaced periodically. The modelling conducted by PRDW confirms adequate circulation and flushing of the bay.
				Determination of potential kelp wrack accumulation in the precinct during storm swell approaching directly into the precinct and operational/recreational impacts this may have	The proposed development is not expected to change the current regime in any way significant enough to alter dislodgement of kelp, and the accumulation of wrack is therefore not expected to change materially from its current levels. Operational maintenance to remove

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					accumulated kelp following storm events will be provided for in the EMPr.
2025/09/01	Email	Margaret Murcott: Urban and Planning Design:		<p>According to the MSDF, the study area is located within the Urban Inner Core (UIC). The UIC is an area of co-investment between the city and the public and private sectors with the aim of achieving coordinated, spatially targeted investment and land development to spatially transform and integrate the city form. In the Urban Inner Core, the desired spatial outcomes are dense and mixed land use patterns that are subject to current and future public infrastructure provision and capacity. In the UIC, “public and private land development that is supportive of spatial transformation is prioritised and implemented” (MSDF, 2023; pg. 61).</p> <p>3 Applicable spatial planning policy and framework</p> <p>3.1 MSDF (2023)</p>  <p>Figure 1: Informants of the MSDF (2023)</p> <p>Spatial strategy 2 of the MSDF aims to manage urban growth, and create a balance between urban development, food security and environmental protection. This means pursuing an urban form with higher densities and mixed land use patterns in the urban inner core, supported by an extensive and efficient public transport system (MSDF, 2023; pg. 70). However, when pursuing this urban form, it is essential to consider the impact of development on biodiversity, aquatic resources, heritage sites cultural landscapes green spaces agricultural land.</p>	The Department's description of how the proposed development aligns Spatial Strategy 2 of the MSDF is accurate and the Department's support for the development is acknowledged.

Date	Method	Name	Interest	Comment / Query	Response
				<p>The proposed development aims to introduce intense diverse uses to study area while promoting responsible coastal development. This proposal aligned with City's goals intensify diversity uses within established public transport system Therefore development proposal on site deemed desirable aligned with MSDF (2023).</p>	
				<p>The Table Bay district plan (2023) was approved in 2023 and offers local area development and land use guidance for the district. The study area is located in sub district 1: Atlantic seaboard suburbs. It been identified as a new development area (NDA) for potential mixed development. "Mixed use NDAs include undeveloped (vacant) or partially developed land targeted for new development with a combination of residential and non-residential uses." (Table Bay District Plan, 2023; pg. 66)</p>	<p>The Department's description of how the proposed development aligns Spatial Strategy 2 of the MSDF is accurate and the Department's support for the development is noted.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>3.2 Table Bay District Plan (2023)</p>  <p>Figure 2 Subject Property in sub district 1: Atlantic Seaboard/Greenpoint</p> <p>Development guidelines for mixed used NDAs</p>	


Date	Method	Name	Interest	Comment / Query	Response
				<p>Mixed use intensification (existing and new development)</p> <ol style="list-style-type: none"> 1. Support high-density mixed residential typologies in all areas of mixed-use intensification and diversification associated with identified urban nodes, development corridors and development focal areas; subject to any local guidelines, bulk services and transport infrastructure availability 2. Encourage greater land use intensification of an appropriate combination of land uses, including office and retail, business and commercial, institutional and social facilities, and high-density residential development along identified development corridors 3. Promote mixed-use intensification at identified urban nodes, key intersections, stations and modal interchanges, especially where opportunities for commercial and other employment-generating land uses exist 	

Date	Method	Name	Interest	Comment / Query	Response				
				<p>The following sub district 1 guidelines are applicable</p> <table border="1" data-bbox="824 220 1375 507"> <tr> <td data-bbox="824 220 1025 507">Ensure appropriate built form and land use to achieve a quality environment</td> <td data-bbox="1025 220 1375 507"> 8. Encourage mixed-use activities at ground level along Beach Road and Somerset Road, creating a vibrant and active pedestrian interface 9. Support increased residential densities along public transport routes and in the vicinity of transport stops </td> </tr> </table> <p>The study area is designated as a destination place by the Table Bay District Plan (2023), where the district plan supports the functioning and enhancement of these areas through a variety of urban and landscape design interventions, facility provision, and redevelopment opportunities. Furthermore, the district plan emphasizes the importance of responsible coastal development. The following guidelines and management priorities are applicable to the study area</p> <table border="1" data-bbox="824 778 1375 1385"> <tr> <td data-bbox="824 778 1025 1385">Coastal protection zone (seaward of the coastal development edge line)</td> <td data-bbox="1025 778 1375 1385"> <ol style="list-style-type: none"> Any future development of coastal infrastructure must be situated or developed in such a way that does not compromise the functional integrity of the coastal environment and that such infrastructure is not exposed to risk from coastal processes. Areas falling partially or totally seaward of the coastal edge line, including remnants of natural systems, must be protected. Amenity opportunities should be promoted with minimum disturbance to </td> </tr> </table>	Ensure appropriate built form and land use to achieve a quality environment	8. Encourage mixed-use activities at ground level along Beach Road and Somerset Road, creating a vibrant and active pedestrian interface 9. Support increased residential densities along public transport routes and in the vicinity of transport stops	Coastal protection zone (seaward of the coastal development edge line)	<ol style="list-style-type: none"> Any future development of coastal infrastructure must be situated or developed in such a way that does not compromise the functional integrity of the coastal environment and that such infrastructure is not exposed to risk from coastal processes. Areas falling partially or totally seaward of the coastal edge line, including remnants of natural systems, must be protected. Amenity opportunities should be promoted with minimum disturbance to 	
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Date	Method	Name	Interest	Comment / Query	Response
				<p>the coastal environment and coastal processes. The recreational amenity of the coast should be protected and careful consideration given to issues such as beach shadowing caused by tall building proposals, stormwater discharge into the coastal environment, and noise resulting from extensive densification of land use.</p> <p>4. Access to the coast must be maintained and improved, and such access must not impact the functional integrity of natural coastal systems.</p> <p>5. Ancillary infrastructure to the coastal environment (ablutions, parking, and access paths) must be of appropriate design to withstand the harsh environment.</p>	
				<p>The development proposal not only aims to reclaim the land for coastal amenity, but also to improve the overall resilience of the coastal area, which is historically transformed and developed. Both the MSDF (2023) and the Table Bay District Plan (2023) support the appropriate intensification and diversification of uses in this area. The proposed development is therefore aligned with spatial planning policy and the long-term vision for the area.</p>	
				<p>4 Analysis and Discussion 4.1 Compatibility with surrounding uses "The study area is located within the V&A Waterfront. The V&A Waterfront is a renowned mixed-use precinct, characterised by</p>	<p>The Department's description of the study area as a mixed-use precinct with a mix of commercial, recreational and residential spaces catering to both locals and tourists is accurate.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>a mix of land uses including residential, commercial, retail and recreational. It is the City of Cape Town's prime tourism and commercial hub.</p> <p>The proposed development is located within the Granger Bay Precinct, a mixed-use precinct with a mix of commercial, recreational and residential spaces catering to both locals and tourists. This area is a major contributor to the City of Cape Town's economy. Given its prime location in close proximity to the city centre, major tourist sites, and the coast, the proposed development offers significant socio-economic benefits while being aligned with land use trends of its surroundings."</p>	<p>The Department's confirmation that the proposed development is located within a prime location in close proximity to the city centre major tourist sites and the coast is accurate.</p> <p>The Department's confirmation that the proposed development offers significant socio-economic benefits while being aligned with land use trends of its surroundings is noted.</p>
				<p>4.2 Access and Transport</p> <p>The study area is located at the intersection of Granger Bay Boulevard and Beach Road, both class 4 collector roads. Beach Road is also a higher order connector route in the Table Bay district.</p> <p>The study area is well located in an area that is well served by various modes of public transport. There are MyCiti bus stops on both Beach Road and Granger Bay Boulevard within walking distance of the property. Both of these roads are also served by Golden Arrow buses and minibus taxis.</p> <p>The area has good access to the local road network, which connects it to the Cape Town CBD and the greater metropolitan.</p> <p>Furthermore, the proposal makes indication to site access improvements which include a pedestrian priority, shared space street that will link the existing intersection of Haul Road and Beach Road with Granger Bay Boulevard.</p>	<p>The Department's description of the transport network as well as public commuter service providers is accurate as contained in the PADSR.</p> <p>The proposed site access improvements which include a pedestrian priority, shared space street that will link the existing intersection of Haul Road and Beach Road with Granger Bay Boulevard as described by the Department are also accurate.</p>
				<p>4.3 Correction and Clarification</p> <p>The pre-application scoping report indicates:</p> <p>"In terms of the Table Bay District SDF, Sub-district 2, the V&A Waterfront is identified for 'potential mixed use', ...Part of the proposed site is also identified as 'potential public service development' (Figure 2—2)."</p> <p>There is no area indicated for potential public service; the entire area is 'potential mixed use'. The legend confusion is caused by the mask indicating the boundaries between sub-districts, as the site is split over two sub-districts.</p>	<p>The mapping/ legend has been corrected in the Scoping Report – thank you for confirming.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>Conclusion</p> <p>The proposed mixed-use development has the potential to address housing needs, provide public amenities and improve access to recreational amenity on the coast. Although the proposed development involves land reclamation and impacts the marine environment, its design, including new coastal protection structures, may be considered an upgrade that improves coastal resilience and has potential to restore a transformed part of the coastline. The proposed development is aligned with spatial planning policy, is compatible with its surroundings and benefits from its prime location in relation to public transport and supporting amenities and services</p>	The Department's support for the proposed development and conclusion that it has the potential to address housing needs, provide public amenities and improve access to recreational amenity on the coast is noted.
				<p>Recommendation</p> <p>The Urban Planning and Design Department in principle supports the proposed development of the Granger Bay precinct and reclamation of land at the V&A Waterfront with the following recommendations</p> <ol style="list-style-type: none"> 1. Given that the residential use makes up a large component of the mixed-use development, the district spatial planning team recommends that the applicant provides a variety of residential options that cater to a variety of income groups. 2. Green infrastructure approaches and principles are employed in order to restore habitats and reduce impacts, particularly in relation to the marine environment. 	<p>The Department's recommendations are noted, and the proposed development aligns with the City of Cape Town's Integrated Development Plan (IDP) 2022–2027 priorities of economic inclusion and building integrated communities.</p> <p>The proposed development seeks to secure the natural functioning of coastal processes, protect sensitive coastal ecosystems, and provide protection from dynamic coastal processes, including sea level rise.</p>
2025/09/01	Email	Charmaine Oxtoby: Biodiversity Management:		This application is not related to the terrestrial or aquatic (freshwater) Cape Town BioNet. Therefore, no comment is required from Biodiversity Management Branch	We note that the Biodiversity Management Branch has no objection to the development.
2025/09/01	Email	Chanee Johnstone: Water and Sanitation		After both Lufefe and I went through the docs, I don't think we have anything additional to add. The capacity report from WS Technical services that is attached to the application, is valid and the comments and conditions contained in it must be adhered to.	The Water and Sanitation's confirmation that the comments and conditions outlined in the Capacity Report as contained in DPASR are adhered to, is acknowledged
2025/09/01	Email	Leona Liebenberg: Electricity Generation and Distribution Department		<p>This Department have no objection to the proposed application provided the following conditions are met:</p> <ol style="list-style-type: none"> 1. Any alterations or deviations to electricity services necessary as a consequence of the proposal, or requested by the applicant, will be carried out at the applicant's cost. 	These conditions are noted.

Date	Method	Name	Interest	Comment / Query	Response
				<p>2. Electrical infrastructure exists on the property and in its vicinity. A wayleave shall be obtained from the Electricity Generation and Distribution Department before any excavation work may commence. In this regard, please contact the Wayleave Centre to sign-up and submit a Wayleave application on https://wayleave.capetown.gov.za</p> <p>3. The City's HV electrical infrastructure has sufficient spare capacity for the proposed development. The 11kV infrastructure needs to be augmented, including substations and points of metering.</p> <p>Annexure 1 – Electricity Services</p> 	
2025/09/01	Email	DFFE Coastal Development & Coordination (Ms Makwarela Mnwana)		<p>1. The pre-application on page 22 states that reclamation will be considered only where it does not conflict with the purposes of coastal public property, namely, to improve public access to the seashore, to protect sensitive coastal ecosystems, to secure the natural functioning of coastal processes, and to provide protection from dynamic coastal processes, including sea level rise. While the pre-application addresses the two elements of the purpose of the CPP, the subsequent reports should address all the components of the CPP. This is to ensure the proposed development holistically considers the purpose of the CPP.</p> <p>2. The spatial and visual contact with the water's edge will be enhanced, and an upgraded slipway will be retained in a new location (page 141). Will the relocated slipway be a proclaimed Public Launch Site in terms of the Public Launch Site Regulations published in Government Notice R 497 of 27 June 2014 (PLS Regulations)?</p> <p>3. The applicant and landowner is V&A Waterfront Holdings (Pty) Ltd, a privately-owned South African company with</p>	<p>The pre-application Draft Scoping Report and associated specialist studies provide initial assessments that address all four purposes of Coastal Public Property under the ICMA. These aspects will be further detailed and formally assessed during the EIA phase to ensure the proposed development is holistically considered.</p> <p>The slipway will be reconstructed and will remain a public slipway. Details of the operational management of this facility will be considered by the applicant to ensure continued accessibility and provision for maintenance and upkeep.</p> <p>The applicant is aware that the ownership of the Coastal Public Property (CPP) – that is, the area between the</p>

Date	Method	Name	Interest	Comment / Query	Response
				local shareholding. The applicant is reminded that, according to the ICM Act, the land reclaimed in terms of 7C forms part of the CPP and the ownership of the CPP vests in the citizens of the Republic and is held by the State on behalf of the citizens of the Republic. CPP is inalienable and cannot be sold, attached, or acquired by prescription, and rights over it cannot be acquired by prescription.	highwater mark and the low water mark vests in the citizens of the Republic and is held by the State on behalf of the citizens of the Republic.
				4. In essence, reclamation brings into existence a portion of land carved out of what is currently CPP, thus it takes from the public realm and into private. The idea that there will be walkways from reclaimed land open to public access is welcomed and aligns with the spirit of the ICM Act; however, the question of ownership of that reclaimed land must be raised. What are or will be the legal processes taken in establishing rights and ownership of the reclaimed land, particularly the integration of the new reclaimed land area into the existing land registry system?	Provided the reclamation is approved by the Minister, the applicant will appoint a land surveyor to survey the new land portions and produce a Surveyor General Diagram in term of the Land Survey Act, Act 8 of 1997 to establish and define the boundaries and extent of the property and to make it eligible for registration in the Deeds Office. This diagram will be lodged with the Chief Surveyor General. Application is then made to DPWI for vesting and registration with deeds office. DPWI issues instruction to the State Attorney to issue a Deed of Grant and then the Deeds office issues title deed to DPWI. An appropriate leasehold agreement between the State and V&A Waterfront Holding would then be negotiated.
				5. What processes will be followed to incorporate the reclaimed land use and zoning into the existing municipal Town planning scheme or land use management system?	Application will be made for incorporation into City boundary and rezoning in terms of the Planning Bylaw for the City of Cape Town. The proposed zoning will be Mixed Use 3 (MU3) and possibly Open Space, but this will be determined during the process.
				6. What will be the role of the deeds office, demarcations board, Surveyor General, given that a new land piece is being established – this obviously impacts existing surveyed maps, land sizes, property boundaries, etc.?	Please see response to 4 above.
				7. The Branch O&C would like to remind the applicant of Section 15 NEM: ICM Act 2008 (Act No. 24 of 2008)" No person, owner or occupier of land adjacent to the seashore or other coastal public property capable of erosion or accretion may require any organ of state or any other person to take measures to prevent the erosion or accretion of the seashore or intentional act or omission of that organ of state or other people." Therefore, the proposed protection measures should consider coastal processing, climate-related aspects, and be able to withstand such conditions. The applicant will be required to perform any maintenance-related work to ensure the longevity of the protection measures.	The draft Scoping Report addresses the need for durable coastal protection, which the applicant will fund. It also emphasizes that the infrastructure should be designed to handle coastal conditions and climate-related risks. The applicant will be responsible for maintaining it over time, in line with the principles set out in Section 15 of the NEM: ICM Act.

Date	Method	Name	Interest	Comment / Query	Response
				8. The Branch O&C notes the specialist report identified and would like to recommend the inclusion of the Climate Change Impact Assessment that will focus on climate-related hazards such as sea-level rise, storm surges, coastal erosion, flooding, and groundwater salinization, and foster adaptive and resilient designs for the proposed development.	The Branch's request is noted, and a Climate Change Impact Assessment conducted by SRK Consulting will form part of the EIA. Terms of reference for this study have been included in the Plan of Study for DFFE's review.
				9. Coastal protection structures (like seawalls, groynes, breakwaters, revetments, and jetties) can significantly alter natural sediment movement in the ocean and along the shoreline, causing sediment accumulation (accretion), whereas the downdrift side often suffers erosion and beach narrowing due to sediment starvation. Therefore, all these aspects should be investigated, assessed, mitigated, and where possible, nature-based solutions must be integrated	<p>According to the Oceanographic Assessment Study (Appendix D1), the coastline around the development area is a rocky coast and no significant changes are anticipated in the sediment transport regime due to the proposed revetment and breakwaters.</p> <p>Further details are included in the Oceanographic Assessment (Appendix D1) and the PRDW report appended to the Scoping Report as Appendix G.</p>
				10. The applicant is reminded of the Duty of Care and the remediation of environmental damage, in terms of Section 28(1) of NEMA, which, specifically states that: "...Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment..." together with Section 58 of the NEM: ICMA which refers to one's duty to avoid causing adverse effects on the coastal environment	<p>The draft pre-application Scoping Report and the associated specialist reports outline potential impacts and recommended mitigation measures.</p> <p>An Environmental Management Programme will be compiled in the next phase of the process, and will prescribe control methods to mitigate and manage negative environmental impacts and enhance positive impacts associated with the construction and operation of the development. Additionally, the EMPr will provide a programme for monitoring the performance of personnel in applying such methods.</p>
				11. The ICM Act advocates for reasonable coastal access to the coastal and estuarine resources. Therefore, the applicant must take note of the provisions of Section 13 of the ICM Act which states that "(1) Subject to this Act and any other applicable legislation, any natural person in the Republic – (a) has a right of reasonable access to the coastal public property; and (b) is entitled to use and enjoy coastal public property, provided such use – (i) does not adversely affect the rights of members of the public to use and enjoy the coastal public property; (ii) does not hinder the State in the performance of its duty to protect the environment; and (iii) does not cause adverse effect. (1A) Subject to subsections (2) and (3), no person may prevent	Access to the coastline is a key principle of the development as envisaged in the ICM Act. The development plans include a new coastal public walkway and a landscaped promenade which allow for an uninterrupted coastal boardwalk from the V&A Waterfront through Granger Bay to connect via Beach Road with the Sea Point Promenade.

Date	Method	Name	Interest	Comment / Query	Response
				<p>access to coastal public property.'" During the construction and operational phase, the applicant, together with any occupiers of the property, should only use the designated access points to the beach with no privatisation of the coast and ensure that the public can safely use and enjoy the coastal zone.</p> <p>12. Section 63 of the ICM Act states that when environmental authorization for coastal activities is applied for in terms of Chapter 5 of the National Environmental Management Act, the competent authority must take into account all relevant factors, including whether coastal public property, the coastal protection zone or coastal access land will be affected, and if so, the extent to which the proposed development or activity is consistent with the purpose for establishing and protecting those areas, the socio-economic impact of the proposed activities and the likely effects of coastal processes on the developmental proposal.</p> <p>13. The applicant is reminded that no person may discharge effluent that originates from a source on land into coastal waters and or dump any waste or other material at sea without authorization from the Minister</p> <p>14. Vehicle use in the coastal area is prohibited unless an ORV Permit is granted by the Minister in terms of the Control of Use of Vehicles in the Coastal Area Regulations published in Government Notice R496 of 27 June 2014 (ORV Regulations).</p> <p>15. You are hereby reminded of Section 24F of the National Environmental Management Act, Act No. 107 of 1998, as amended, that no other additional activities outside the scope of this application may commence before an Environmental Authorization is granted by the Department</p>	<p>The Competent Authority (DEA&DP) is expected to consider all relevant factors, and provision has been made in the Plan of Study for EIA to provide relevant information and assessments to inform this decision.</p> <p>Wastewater generated from the development will be discharged into the municipal sewer. The municipality has confirmed sufficient unallocated capacity to accommodate the new development.</p> <p>Construction vehicles will operate in the area as necessary and the applicant will make application for the necessary permits if authorisation is granted. For the operational phase, public vehicle access along the coastline will be prohibited, with only limited, controlled access for service vehicles.</p> <p>The E.A.P notes that no activity may commence prior to obtaining an Environmental Authorisation.</p>
2025/09/03	Email	DEAD&DP (Keagan-Leigh Adriaanse)	Competent Authority	<p>3.1. Activity Description</p> <p>3.1.1. The pre-application Scoping Report indicates that the potable water supply will be provided by the City of Cape Town and will be supplemented in future by the V&A desalination plant. It is unclear as to whether the desalination plant is an existing plant or will form part of the application for environmental authorisation. Clarification is therefore required.</p>	<p>The desalination plant is existing and currently has capacity to supply up to 3.3 megalitres of potable water to the Waterfront. The coastal water discharge permit was approved on 30 November 2020. Permit reference number 2020/001.IWCN&A Waterfront Desai Future expansions will allow for additional supply to the proposed development, to supplement available potable water supply from the City of Cape Town.</p>

Date	Method	Name	Interest	Comment / Query	Response
				3.1.2. Based on figure 4-7 of the pre-application Scoping Report (i.e. Conceptual construction schedule for Granger Bay Phase 0 Infrastructure (PRDW, 2025)), it appears that the proposed western revetment will create an enclosed bay in the area where the existing slipway is located. It is unclear as to whether this enclosed bay will also be infilled as part of the reclamation application and footprint. Clarification is therefore required	The bay around the existing slipway is proposed to be infilled as part of the reclamation.
				3.1.3. This Directorate notes that the material for reclamation purposes will be obtained from a quarry in Durbanville. An indication as to the estimated volume of material required must be provided (where possible).	An estimated volume for the proposed reclamation will be provided in the EIA Report. At this stage it is anticipated that the total imported rock mass will be approximately 350,000 t, with the type of fill being quarried rock, 80% with rock mass below 500 kg and 20% with rock mass above 500 kg and up to 6 tonne.
				3.1.4. This Directorate notes that three (3) tidal pools are included in the proposed public amenities. It is unclear as to whether any ablution or changing facilities will be included in the associated public amenities. Clarification is therefore required.	Tidal pools were conceptually included in certain diagrams as potentially forming part of the proposed public space, but details are not yet confirmed. Changing and ablution facilities will be provided. This is likely to be in the podium levels of adjacent buildings. The buildings are not designed to this level of detail yet.
				3.2. Applicable listed activities 3.2.1. The pre-application Scoping Report indicates that an existing 1.5m diameter stormwater drain located in Granger Bay will be extended to the new revetment and that additional outfalls are planned through the revetment. In light of the above, it appears that Activity 9 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) will be triggered by the proposed stormwater infrastructure. Confirmation of the applicability of the aforementioned listed activity must therefore be provided.	Activity 9 of Listing Notice 1 of the NEMA EIA Regulations, 2014 (as amended) has been added to the Scoping Report and Application.
				3.2.2. The pre-application Scoping Report further indicates that a new electrical distribution network is planned. The applicable listed activities with respect to the transmission and distribution of electricity must be determined. Further detailed information is therefore required.	The proposed development entails expansion of the existing (11kv) urban electrical distribution. No listed activities are applicable
				3.3. Terms of Reference ("ToR") for specialist studies 3.3.1. Traffic impacts 3.3.1.1. The ToR for the Traffic Impact Assessment must include an assessment of potential traffic impacts associated with the transportation of the quarry material to the proposed site.	The TIA's terms of reference have been updated to include the impacts of the transportation of quarry material to the proposed site.

Date	Method	Name	Interest	Comment / Query	Response
				3.3.1.2. This Directorate notes that the ToR includes a comparative assessment of the current proposal and the approved scheme. It is unclear as to why the approved scheme is being comparatively assessed when it is not an alternative to be assessed in the EIA phase. Clarification is therefore required.	The approved scheme was based on an extensive TIA, which was accepted by the relevant authorities. The TIA for this application will consider whether the impacts of the new application are significantly different from what has already been approved. It is not intended that this should result in a comparative assessment of alternatives.
				3.3.2. The ToR for the Socio-Economic Assessment must consider the following aspects: 3.3.2.1. Gender considerations during all phases of the proposed development.	The SEIA ToR have been updated to include gender considerations during all phases of the proposed development.
				3.3.2.2. In light of the anticipated number of employment opportunities, a labour force plan should be considered.	A labour force plan is not warranted by the proposed development, given that it is likely to be implemented over a number of years.
				3.4. Confirmation of services 3.4.1. This Directorate notes that potable water supply and sewage disposal will be provided by the City of Cape Town. Confirmation of sufficient, spare and unallocated services must be provided in the Scoping Report and/or Environmental Impact Assessment ("EIA") Report.	Confirmations of sufficient, spare and unallocated service capacities have been provided in the Scoping Report (Appendix F1).
				3.4.2. The pre-application Scoping Report indicates that solid waste will be handled at the V&A's waste handling centre. Confirmation of sufficient, spare and unallocated capacity from the waste handling facility must be provided in the Scoping Report and/or EIA Report.	Confirmations of sufficient, spare and unallocated capacity from the waste handling facility are included in Appendix F2 to the Draft Scoping Report.
				3.5. Process flow diagrams 3.5.1. Figure 1-5 of the pre-application Scoping Report (i.e. Overview of the Scoping and EIA Process and associated public participation) indicates that the Scoping Report will be accepted or rejected by this Department. Please note that the Scoping Report may either be accepted or refused. Please correct this error	The Scoping Report has been updated to state that the Scoping Report may either be accepted or refused.
				3.5.2. Page 34 of the pre-application Scoping Report indicates that "DEADP will not make a decision on the EA application prior to receipt of the Minister's Pre-approval." Please note that this statement is incorrect. The Competent Authority will make a decision on the application for EA based on the information presented in the final EIA Report. Please correct this error.	The Scoping Report has been updated to state that the Competent Authority will make a decision on the application for EA based on the information presented in the final EIA Report – noting that an EA may not be granted without the pre-approval being in place.

Date	Method	Name	Interest	Comment / Query	Response
				3.5.3. Figure 1-6 (i.e. The Scoping and EIA process to be followed alongside the ICMA application, with approximate dates) and page 180 of the pre-application Scoping Report depict that the Ministerial pre-approval will be submitted after the submission of the EIA Report is submitted to the DEAD&DP for decision making. Please note that the Ministerial pre-approval must be submitted along with the EIA Report to be submitted to the Competent Authority for decision making. Please correct this error.	DEA&DP's requirement for the pre-approval to be submitted along with the EIA Report is noted and the programme has been updated accordingly in the Scoping Report.
				3.5.4. Section 8.11 of the pre-application Scoping Report (i.e. Schedule for the Scoping and Environmental Impact Assessment) must take cognisance of Regulation 3(2) of the NEMA EIA Regulations, 2014 (as amended), which states that "(2) For any action contemplated in terms of these Regulations for which a timeframe is prescribed, the period of 15 December to 5 January must be excluded in the reckoning of days."	The schedule in the Scoping and EIA does take into account the exclusion of the period between 15 December and 5 January in the reckoning of days as per Regulation 3(2) of the NEMA EIA Regulations, 2014 (as amended).
				3.6. Alternatives 3.6.1. This Directorate notes that the proposed layout is considered as technically feasible and more responsive to economic and social needs and that the Environmental Authorisation ("EA") issued by this Department on 13 April 2018 (Ref. No. 16/3/1/2/A7/4/3058/12) will not be subject to further assessment. It is therefore assumed that the new application for environmental authorisation is intended to replace the existing valid EA (Ref. No. 16/3/1/2/A7/4/3058/12) and will not be considered as an alternative to the proposed development. Please confirm if this assumption is correct.	We confirm that the activities authorised under the existing EA (Ref. No. 16/3/1/2/A7/4/3058/12) will not be assessed as an alternative to the proposed development.
				3.6.2. Page 128 of the pre-application Scoping Report indicates Alternative 2 but also refers to Alternative 3. Please correct this error.	The error is noted and has been updated in the Scoping Report.
				3.6.3. Although only two (2) alternatives have been presented in the pre-application Scoping Report, it is advised that additional alternatives be identified for further assessment in the EIA phase or reasons why no reasonable or feasible alternatives exist must be provided.	The DSR further explains that there are no other feasible site alternatives and that the site selection was based on factors such as: <ul style="list-style-type: none"> ○ Its potential to provide improved coastal amenities on vacant and underutilised land. ○ Its strategic location relative to the CBD and access to major roadways. ○ The existing insufficient shoreline protection and eroding gravel beach.

Date	Method	Name	Interest	Comment / Query	Response
				3.6.4. Reasons as to why alternatives without the proposed reclamation activities have not been considered must be provided.	<ul style="list-style-type: none"> o Compatibility with existing spatial planning and high socio-economic potential. o Availability and feasibility of bulk services. <p>The EIA Report will elaborate on why no reasonable or feasible alternatives are deemed to exist.</p> <p>Reasons as to why alternatives without the proposed reclamation activities were not considered include the following factors:</p> <ul style="list-style-type: none"> • Lack of shoreline protection between the Oceana Powerboat Club and the V&A dolos revetment consists • The existing structures are inadequate for long-term protection against storm surges and flooding. • Maintaining the existing embankment poses risks to public safety and property • The proposal to construct a deep breakwater and a recreational reclamation area in Granger Bay has been part of the V&A Waterfront's conceptual planning since at least 1998
				3.7. Public Participation 3.7.1. Heritage Western Cape's response to the Notice of Intent to Develop must be included in the Scoping Report.	HWC's response to the notice of intent to develop is included as Appendix E2 to the Draft Scoping Report.
				3.8. Plan of Study 3.8.1. Page 168 of the pre-application Scoping Report indicates that "A central assessment process through which inputs are integrated and presented in an EIA Report that is submitted for approval to the DFFE and commenting authorities;" Please correct this error.	The competent authority for this application is DEA&DP, and this has been corrected in the Draft Scoping Report. DFFE is also a commenting authority.
				3.8.2. Page 169 of the pre-application Scoping Report indicates that "The draft EIA Report (including EMPr and WULA Report) will be made available for a 60-day comment period, via the project website and in public libraries." It is unclear as to why a WULA Report is required. Clarification is therefore required.	The erroneous mention of a WULA report has been corrected in the draft Scoping Report.
				3.9. You are hereby advised that the Scoping Report must contain all the information outlined in Appendix 2 of the NEMA EIA Regulations, 2014 (as amended), and must also include the information requested in this letter.	The E.A.P notes that Scoping Report must contain all the information outlined in Appendix 2 of the NEMA EIA Regulations, 2014 (as amended), and the information requested by the Competent Authority will be provided.
				4. This Directorate now awaits the submission of the application for Environmental Authorisation.	An application for Environmental Authorisation has been submitted to the competent authority.

Date	Method	Name	Interest	Comment / Query	Response
				5. Please note that the activity may not commence prior to obtaining an Environmental Authorisation. It is an offence for a person to commence with a listed activity unless the competent authority has granted an Environmental Authorisation for the undertaking of the activity.	The E.A.P notes that no activity may commence prior to obtaining an Environmental Authorisation.
				This Department reserves the right to revise or withdraw comments or request further information based on any information received.	Should the Competent Authority request further information, the E.A.P will provide it timeously. The E.A.P further notes that the Department reserves the right to revise or withdraw comments
2025/09/25		Abdullah Saleem		I would like to apply for a kiosk space as a trader in the upcoming granger bay development. I am currently running a cellular electronics and gadget kiosk in Parow shopping centre from last 12 years and want to open another branch. Please provide more information regarding availability and leasing management. Thanks and regards	This is not addressed as part of the EIA process, but it has been forwarded to the applicant for consideration.



Addendum to the Pre-application Public Participation Comments and Responses Report: Comments received after 01 September 2025

The Proposed Granger Bay
Development at the V&A
Waterfront

DEA&DP REF: 16/3/3/6/7/2/A7/4/3071/25

DATE: 13 NOVEMBER 2025

PREPARED FOR
V&A Waterfront



PREPARED BY

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One comment was received after the end of the first pre-application commenting period, which ended on 1 September 2025. The comment and response are set out below.

Date	Method	Name	Interest	Comment / Query	Response
2025/09/02	Website	Steve Wright		<p>Thank you for taking my call yesterday about submission of comment re the V&A Granger Bay Environmental Draft Report / public participation process.</p> <p>As a recently registered I&AP I am still busy going through the extensive reports and documentation required of a hugely significant development proposal such as this. I am therefore only in a position to provide very brief (and perhaps even unsubstantiated?) comment at this stage.</p> <p>I should however be in a position to comment more fully and intelligently during the Draft Scoping Report: Public Participation and 30-day comment period scheduled for around October / November 2025.</p> <p>In the interim, my initial quick perusal of the pre application draft scoping report has prompted me to raise the following points. In listing these below, my motivation is to look for the positives to make the development 'happen', either as proposed or scaled back (to ensure compliance with legal, economic, environmental, heritage, engineering, and related criteria).</p> <p>I also always, pose the question as to whether the applicant has the financial muscle and technical expertise to deliver a 'huge project'.... there being nothing worse than a half completed coastal development.... on account of cash flow problems or non-viability. But with the V&A fronting the proposed development, this concern surely does not warrant concern.</p> <p>My main points requiring special attention in the scoping report include:</p> <ol style="list-style-type: none"> 1. The Oceanographic Impact assessment appeared to be too narrowly focused and did not appear to consider the impact of possible coastal erosion on the 	<p>Thank you for the submission. We look forward to further engagement.</p> <p>The Draft Scoping Report has now been published for comment, on 10 November 2025.</p> <p>Your motivation is acknowledged.</p> <p>The applicant has the necessary financial ability to implement the proposed project, as suggested.</p> <p>Your concerns on potential coastal impacts are noted. Wave modelling was conducted by PRDW, and was the basis for the review by the</p>

Date	Method	Name	Interest	Comment / Query	Response
				Milnerton, Bloubergstrand and other Table Bay coastlines. It also failed to mention the effects of global warming (unless I missed this) and, overall, I would have liked some actual cases....and reassurance that these coastlines will not be further eroded (as by previous development)	oceanographic specialists. The model results indicate that the proposed land reclamation and breakwaters are not expected to impact on wave heights at a distance of more than 500 metres from the development, as described in the modelling report by PRDW included in the Draft Scoping Report (Appendix G). A separate Climate Change Impact Assessment will also be conducted to review the effects of global warming. Further details are included in the PRDW report appended to the Scoping Report as Appendix G.
				2. The Heritage report lists the numerous shipwrecks in Table Bay but seems to fall short of specifics (have any actual dives / surveys taken place?) and it seems to stop short of salvage implications.	The primary focus of the heritage NID was defining the scope of the impact study (the HIA) which will identify, assess, and recommend mitigation for archaeological resources. The HIA will form part of the EIA.
				3. Regarding services, one sincerely hopes that the actual scoping report / EIA application will be more detailed than the present blanket comment that" Wastewater management, potable water supply, solid waste removal and disposal, and electrical supply will be accommodated within the existing infrastructure capacity. Co incidentally I was at the Mouille Point lighthouse recently and the stench of sewerage discharge into the Table Bay was shocking.	Detailed capacity confirmations related to wastewater management, potable water supply, solid waste removal and disposal, and electrical supply are presented in Appendix F1 and F2 of the draft Scoping Report (Water & Sanitation Capacity Report and Waterfront Solid Waste Facility) respectively.
				4. The same comment as above applies to the TIA, which states that "No major roads access road or external road upgrades are required to support the proposed development"	Transport concerns are acknowledged and will be assessed and responded to in a Transport Impact Assessment forming part of the EIA.
				5. I am immensely proud of the V&A Waterfront and all that contributes to the economy, tourism, and prestige. I do however feel that it is almost overly elitist, and may not fully adhere to SPLUMA's five main objectives, specifically: <ul style="list-style-type: none"> • Spatial justice, and the need to redress past spatial injustices 	Specific mechanisms and objectives related to addressing spatial injustice include: <ul style="list-style-type: none"> • Policy Alignment: Chapter 2 of the draft pre-application Scoping Report details how the proposal aligns with various national, provincial and local legislative frameworks and policies • Equitable Coastal Access: The Integrated Coastal Management (ICM) Act of South Africa

Date	Method	Name	Interest	Comment / Query	Response
				<ul style="list-style-type: none"> • Spatial sustainability, with particular note of environmental factors. • Spatial resilience...noting that the coastline is a common asset, which must therefore be truly shared at all reasonable times.... <p>To conclude, I support the Need and Desirability conclusions, noting that the dry land is degraded and crying out for sensible redevelopment. The 78,000 bulk meters be the (proposed) reclaimed land area of some 3 Ha does not frighten me, provided the independent professional reports concur. The alternative, i.e., to "Do Nothing "is not a consideration.</p> <p>I look forward to tightened up final draft Reports as per your overall timeline / program.</p>	<p>promotes equitable access to coastal public property. Public access is identified as a key design consideration for the development, with integrated public spaces and walkways enhancing the accessibility and inclusivity of the development.</p> <ul style="list-style-type: none"> • Inclusive Development: The Table Bay District Spatial Development Framework (DSDF) aims to ensure that development contributes to spatial transformation and equitable access to opportunities, particularly in historically disadvantaged areas. The development is intended to create opportunities for a wider spectrum of users, ranging from small-scale entrepreneurs and informal traders to recreational users and community groups. <p>These inputs on the Need and Desirability considerations are acknowledged with thanks.</p>