



## APPENDIX M2

# Comments and Responses Report: Public Participation on Draft Scoping Report Proposed Granger Bay Precinct Development at the V&A Waterfront

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

**DATE:** 15 January 2026

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



**PREPARED BY**

 **Infinity**  
Environmental

Email: [grangerbay@infinityenv.co.za](mailto:grangerbay@infinityenv.co.za)  
Tel: 021 834 1600  
Collingwood Building, Black River Park  
2 Fir Street, Observatory, Cape Town

# DOCUMENT DETAILS

## PROPOSED GRANGER BAY PRECINCT DEVELOPMENT AT THE V&A WATERFRONT | **COMMENTS AND RESPONSES REPORT: PUBLIC PARTICIPATION ON DRAFT SCOPING REPORT**

### APPLICANT

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

PO Box 50001, Cape Town, 8001

### ENVIRONMENTAL ASSESSMENT PRACTITIONER

**Infinity Environmental (Pty) Ltd.**

Collingwood Building

Black River Park

2 Fir Street

Observatory, Cape Town

### Contact

grangerbay@infinityenv.co.za

www.infinityenv.co.za

### 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

K Heinrich B.Sc. Hons (Cand E.A.P. #2023/6727)

K Chimatira B.Sc. Hons (Cand E.A.P. #2023/7160)

### Internal Review

J Rose B.Sc.Hons (Reg. E.A.P. #2019/1116)

# COMMENTS AND RESPONSES REPORT FOR SCOPING PUBLIC PARTICIPATION: COMMENT PERIOD BETWEEN 10 NOVEMBER 2025 AND 10 DECEMBER 2025

## Comments were received from the following organs of state:

- DFFE: Nompumelelo Lekalakala (Biodiversity Conservation)
- DEAD&DP: Kraigen Govindasamy
- CCT Urban Planning and Design Department: Margaret Murcott -
- CCT Water and Sanitation Department: Chanee Johnstone
- CCT Electricity Generation and Distribution Department: Leona Liebenberg
- CCT Solid Waste Management Department: Gevarnia Petersen

## Comments were received from the following interested and affected parties (I&APs):

- Anthony Mallows (Mallows Viljoen Worldwide)
- Burkhard Blum (Woodbridge Island Body Corporate)
- Evashan Ritchie (RG Holdings)
- Hercules Christiaan van Heerden (Findata)
- Marcelle Julius (Woodbridge Island Estate)
- Paul Ziegenhardt (Marina Residential Estate - Home Owners Association (HOA))
- Shannon Hampton
- Anya Ponton (The Water Club Association)

Date	Method	Name	Interest	Comment / Query	Response
2025/11/10	Website comment	Hercules Christiaan van Heerden		How many tons of filling is required for this project?	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 tons 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.
				How are you going to get the requisite fill that is required to site?	Most material is expected to be hauled from commercial quarries via the N7, N1, Buitengracht Street (M62), Helen Suzman Blvd (M6), and Granger Bay Boulevard.
				Where will you be sourcing the fill	The material for reclamation purposes will be obtained from commercial quarries, supplemented where possible with excavated material stored on the site and from other nearby developments.
2025/11/10	Website comment	Anthony Mallows		The expansion of the V&A Waterfront is a vital initiative to strengthen the city of Cape Town's economic and job creation sectors, and I believe that this project is part of a important strategic initiative to strengthen the economic structure of South Africa through tourism, employment, and economic growth.	Your views on the motivation for the proposed development and the economic prospects associated with it are acknowledged.
2025/11/12	Website comment	Evashan Ritchie		Interested in acquiring a few units (apartment or hotel)	This is not addressed as part of the EIA process, but it has been forwarded to the applicant for consideration.
2025/11/17	Website comment	Paul Zigenhardt	Business. Estate Manager of the Marina Estate at the V&A	To Whom It May Concern, I am writing to formally express my concern regarding the proposed development around the Waterfront precinct in Cape Town.	Thank you for your comments, which are responded to below.

Date	Method	Name	Interest	Comment / Query	Response
				<p>My primary concern relates to the already overburdened traffic infrastructure in this area. On any given day - particularly during stadium events or peak tourist seasons - the congestion becomes intolerable. The current road network creates a bottleneck effect, making it feel as though the entire city is funnelled through a single, narrow corridor.</p> <p>Given this reality, it is difficult to see how further development would not exacerbate the problem. Additional construction and increased footfall will inevitably place more pressure on an already fragile system.</p> <p>Furthermore, any future development plan should include significant upgrades to the surrounding infrastructure, such as widening existing roads, creating new access routes, and establishing direct links to major highways. Without these improvements, the area risks becoming increasingly gridlocked, undermining both its livability and economic potential.</p> <p>This precinct is a vital part of Cape Town's identity and economy, but its long-term accessibility must be protected. I respectfully request that traffic impact assessments and infrastructure upgrades be prioritized before any new development is approved.</p> <p>Thank you for considering this perspective.</p>	<p>Transport impacts of the proposed development will be considered in the Transport Impact Assessment forming part of the EIA, and where relevant mitigation measures will be proposed to address transport impacts of additional trips generated by the proposed development.</p>
2025/11/24	Website	<p>Marcelle Julius</p> <p>AND (separate but identical submissions)</p>	Woodbridge Island Estate	<p><b>1. Potential Coastal Impact</b></p> <p>The planned land reclamation and associated fortifications could further destabilize the Milnerton shoreline and intensify coastal erosion, particularly around Woodbridge Island.</p> <p>Furthermore, the analysis does not account for subaqueous sediment features - such as submerged sandbanks - that exhibit mobility in response to wave and</p>	<p>These comments are similar to those provided in respect of the pre-application Draft Scoping Report, which were responded to previously.</p> <p>Modelling of the oceanographic impacts of the proposed</p>

Date	Method	Name	Interest	Comment / Query	Response
		Burkhard Blum	Woodbridge Island Body Corporate	<p>current forcing. These features play a critical role in modifying nearshore hydrodynamics and can significantly influence patterns of erosion and accretion along adjacent coastlines.</p>	<p>development found that reflected waves from the new breakwaters would not travel more than 500 m into Table Bay and will not reach the Bloubergstrand beach or Milnerton beach. No impacts on coastal erosion at Milnerton are anticipated. Refer to the Oceanographic Study (Appendix D1) and the modelling report (Appendix G) included with the Draft Scoping Report.</p>
				<p><b>2. Lack of sufficient Coastal Impact Study / Current 2025 study is insufficient</b></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&amp;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: 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 behavior or energy transmission of long-period wave reflections. Given that long-period (infragravity) waves</p>	<p>The WML study referenced here is an independent assessment, and includes as informants to its assessment the wave and hydrodynamic modelling conducted by PRDW (Appendix G to the Scoping Report) that assessed the potential hydrodynamic and sedimentological effects in a model domain that extended east of the Port of Cape Town. The modelling found no significant changes in wave heights or currents at a distance of 500 metres or more from the proposed development, whereas Milnerton is some 6 000 metres from the proposed development.</p> <p>Both short and long waves were simulated in the model, with modelled total wave heights based on both swell waves (period &lt;25 s) and longer period waves caused by bound</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>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>	<p>waves, surf beat and harbour resonance. These dynamics are not considered only in relation to the nearby marina, but for the entire model domain. The findings reported by PRDW include that 'The reflections off the eastern breakwater of the development generate nodes and anti-nodes, changing the wave height to the north-east of the development by up to 0.5 m for up to 300 m away from the structure. However, the development does not change the wave heights significantly beyond 500 m from the development.'</p>
				<p>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>	<p>The sediment transport regime along the shoreline adjacent to the proposed development (correctly noted as negligible due to the rocky substrate) is a separate matter from the potential impacts of changes in waves and currents. The latter, as described above, have in fact been modelled and found not to be significantly altered at a distance of only 500 m from the development, indicating that the shoreline north from Lagoon Beach would not be affected.</p>
				<p>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>	<p>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, and are</p>

Date	Method	Name	Interest	Comment / Query	Response
				<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>considered a robust assessment. Refer to the Oceanographic Study (Appendix D1) and PRDW modelling report (Appendix G) for more details.</p> <p>The specialists have reviewed these comments and are confident in the model inputs and assumptions as a basis for impact assessment.</p>
				<p><b>3. Ben Schoeman Docks has an erosive impact on Woodbridge Island</b></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.</p> <p>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:</p> <p>"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>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</p>	<p>As noted above, impacts on the Milnerton shoreline are not anticipated to result from the proposed development, due to the comparatively large distance (6 km), while changes in currents are not expected to extend more than 300 m, and changes in wave height are not expected to extend more than 500 m from the proposed development. The proposed breakwaters are at a very different scale, being considerably smaller than the Ben Schoeman Dock development, and unlike the Ben Schoeman Basin, the proposed Granger Bay breakwaters would be located on a rocky shoreline where sediment transport is not expected to</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>Bay, particularly in the Milnerton region, finding a new equilibrium through erosive forces."</p> <p>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.</p> <p>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</p>	<p>be altered. Granger Bay is also considerably further away from Milnerton. Possible changes have been modelled by the coastal engineers (Appendix G) who found that no impacts will be experienced on the Milnerton coastline.</p> <p>Mitigation measures are identified for significant impacts. No significant impacts on the Milnerton shoreline are anticipated, and mitigation measures are therefore not required in this case.</p> <p>Your registration as an interested and affected party is confirmed.</p>
2025/11/27	Website	Shannon Hampton		<p>The importance of intact ecosystems and holistic integrated coastal zone management should preclude even considering this work. You'll be destroying inshore habitat and impacting existing and established patterns of erosion and sedimentation. Not to mention impacting on the megafauna in the area, both through the adjustment on habitat, substantial ecosystem change and the noise disruption during construction and after as a result of increased activity. The idea for a large artificial bay with limited water exchange will result in increased nutrient levels and potential HAB. This is an irresponsible development and unnecessary when money could better be spent rejuvenating land areas on "brown" properties.</p>	<p>The impacts on marine ecosystems are assessed in the specialist marine impact assessment report by Anchor Environmental and the marine mammal impact assessment by Dr Simon Elwen, included in the Scoping Report. Impacts assessed include changes in habitat and noise disruption, and mitigation measures for these impacts are proposed.</p> <p>The wave and hydrodynamic modelling study considers flushing and water exchange, concluding that twin eddies will induce flushing of water out of the proposed bay, with a stronger flushing effect in summer and autumn. Refer to Appendix G of the</p>

Date	Method	Name	Interest	Comment / Query	Response
					<p>Scoping Report for the PRDW wave modelling study.</p> <p>The suggestion in respect of alternative sites is noted, but no such sites have been identified as feasible or reasonable, within the vicinity of the V&amp;A Waterfront.</p>
2025/12/03	Email	<p><b>Department of Forestry, Fisheries, and the Environment (DFFE), Biodiversity Directorate</b></p> <p>Sekoa Lekota</p>		<p>The Directorate: Biodiversity Conservation has reviewed and evaluated the reports.</p> <p>The Directorate: Biodiversity Conservation has reviewed the reports and does not have an objection to the Draft Scoping Report and the Plan of Study; however, the report must comply with the following:</p> <p>The procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5) (A) and (H) and 44 of the National Environmental Act, 1998.</p> <p>In conclusion, the Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at email; <a href="mailto:BCAdmin@dffe.gov.za">BCAdmin@dffe.gov.za</a> for the attention of Mr Seoka Lekota</p>	<p>The Directorate's comments on the Draft Scoping Report are noted. Procedures in terms of sections 24(5) are complied with by the relevant specialist studies. The draft EIA Report will be provided to the directorate for comment.</p>
2025/12/03	Email	Anya Ponton	The Waterclub Association	<p>1. Introduction</p> <p>This document constitutes a preliminary response to the Draft Scoping Report (DEA&amp;DP Ref. No. 16/3/3/6/7/2A7/4/3071/25, dated 10 November 2025). It is preliminary because significant underlying data—data that should support the report and its conclusions—have either not been provided or not assembled. All rights are reserved pending the provision of such information.</p>	<p>These comments are acknowledged with thanks.</p> <p>The nature of a Scoping Process is that it identifies issues and aspects to be further addressed in the Environmental Impact Assessment – we trust that any issues deemed not to have been addressed to date will form part of the</p>

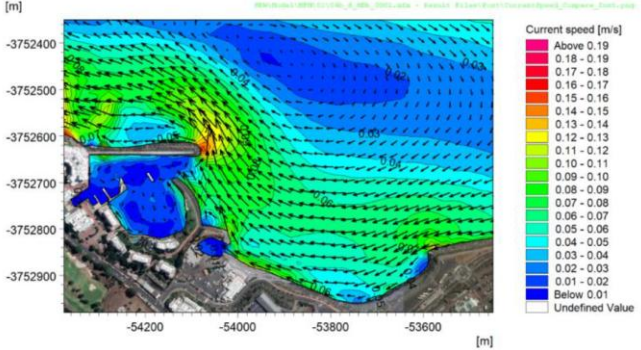
Date	Method	Name	Interest	Comment / Query	Response
				<p>This response is submitted on behalf of the Waterclub Berthholders Association (BHA), which manages and operates the Waterclub Marina. The marina lies within 200 metres of the planned V&amp;A development and comprises three major jetties, associated walkways, electrical and water services, and 74 privately owned moorings.</p> <p>It appears that no notice has been given to berth owners—whether residents or third-party owners—whose property rights and asset values stand to be affected.</p>	<p>EIA Report, where relevant and appropriate.</p> <p>The submission of comments on behalf of the Berthholders Association is noted. There are no public records that indicate that the Marina is operated by a separate entity to the Waterclub itself, nor that any moorings may be registered as owned separately from the Waterclub itself – thank you for bringing this to our attention. In earlier engagements with Ms Ponton the impression had been given that the management of the Water Club Association had undertaken to notify all owners on behalf of the EAP, since the sharing of contact information for individual owners was not consistent with the provisions of the Protection of Personal Information Act, 2013. We also note that on 11 August 2025, we received email confirmation from Ms Ponton that the notification of the pre-application public participation process had been 'immediately forwarded to all registered owners'. Media and site notices, together with significant public media attention to the public participation process, will have aided in drawing the attention of all potential interested and affected parties to the opportunity to comment and register as I&amp;APs.</p>


Date	Method	Name	Interest	Comment / Query	Response
					<p>The submission of these comments by (or on behalf of) the Berthholders Association is an indication that the Association itself is at least informed of the public participation process.</p> <p>The EAP undertakes to ensure that all I&amp;APs have a reasonable opportunity to participate, and to this end any potential I&amp;AP is invited to register their interest at any time, using the project website, WhatsApp number, or email address.</p> <p>Furthermore, media and site notices and additional notifications to potential I&amp;APs who have not yet registered their interest, will be distributed at the commencement of public participation on the draft EIA Report. The management of the Water Club Association will also again be approached for assistance either in providing contact details for individual berth holders, or distributing notifications internally.</p>
				<p><b>2. Overview</b></p> <p>Separate and apart from the defective notice issue, the Draft Scoping Report suffers from a fundamental evidentiary gap:</p> <ul style="list-style-type: none"> <li>• No bathymetric study of the marina appears to have been undertaken; and</li> <li>• No request was made to the BHA to supply its historic bathymetric records.</li> </ul> <p>No explanation is provided for these omissions.</p>	<p>The PRDW Wave and Hydrodynamic Modelling Report (Appendix G to the Scoping Report) includes a bathymetric survey for the model</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>The BHA has, at its own cost, commissioned an updated bathymetric study, assessed alongside previous surveys. The most recent report demonstrates significant re-silting over the past four years, raising serious concerns about how the proposed development may alter sedimentation dynamics.</p> <p>The Atlantic Seaboard is characterised by a notable longshore sediment flow, with accumulation occurring predominantly in sheltered areas. The Waterclub Marina, being sheltered, naturally accumulates finer sands and silts and therefore requires periodic dredging.</p> <p>Accordingly, the BHA must formally request that the V&amp;A and its consultants provide detailed information on the expected sedimentation impact as part of the Public Participation Process.</p>	<p>domain, dated 2022, and including the Granger Bay Marina.</p> <p>That the marina is subject to sediment buildup is also noted in the above report, which describes a 'muddy' seabed within the Water Club marina, and concludes that under the baseline scenario (i.e. without the proposed reclamation and development), longer-term mud accumulation is predicted 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 described by PRDW as consistent with bathymetric surveys of the Waterclub and historical dredge records, which indicate that periodic maintenance dredging of the Waterclub has been required.</p> <p>The modelled scenario including the proposed development indicates that the development will not result in significant impacts on the bed shear stresses in the Waterclub marina, and thus that no additional mud accumulation and no additional volume of maintenance dredging is predicted for the Waterclub.</p> <p>Please refer to pp 43-44 of the PRDW report (Appendix G to the Scoping Report) for further details.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>The Draft Scoping Report expresses an optimistic preliminary conclusion, suggesting long-term improvements in the sedimentation regime. However, such optimism is unsupported by evidence: no bathymetry of the marina, no historic comparison, and no proper analysis of sediment transport pathways affecting the Waterclub basin.</p>	<p>As noted above, this assertion is not correct, as the model and associated studies did include both a recent bathymetric survey and a review of historical change.</p>
				<p>A further deficiency is that the modelling ignores the construction phase, focusing only on “before” and “after” snapshots. Construction—particularly land reclamation and seabed disturbance—will inevitably release sediment, and the directional flow modelling already indicates that displaced material is likely to be driven toward the Waterclub Marina.</p>	<p>The focus of the wave and hydrodynamic modelling is the longer-term effects of the proposed development. Consideration of the construction-phase impacts forms part of the terms of reference for the EAP, the oceanographic and coastal engineering professionals for the EIA process. Mitigation measures will be specified where appropriate, and included in the EMPr; these could include the use of only clean, sediment free coarse fragment rock fill (and dolosse) for stabilisation, and the use of geotextile and/or silt curtains to contain sediment within the works area.</p>
				<p>The Environmental Practitioner concludes that long-term increases in mud content inside the marina will be “insignificant”. Even if correct, the associated costs of more frequent or more complex dredging are not addressed.</p> <p>Additional risks include:            Reduced flushing → increased nutrient load → proliferation of kelp and marine vegetation → increased maintenance costs.</p>	<p>It is not clear why more frequent dredging would be required, given the finding that no changes in mud accumulation within the marina are anticipated as a result of the proposed development.</p>
				<p>Reduced water clarity affecting the marina’s Blue Flag status and its swimming channel.</p>	<p>It is clear from the hydrodynamic modelling conducted (Appendix G: section 3.2) that changes to flushing</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>Impacts on the Cape Town Aquarium, which collects krill daily from the marina ecosystem.</p>	<p>within the marina are not an expected outcome of the proposed project post-construction.</p> <p>Any direct impacts of sedimentation during the construction phase will be considered in the impact assessments with mitigation measures to be included in the EIA Report and Environmental Management Programme. Mitigation measures to be implemented during reclamation works will be specified, and will include the use of geotextiles or similar means to contain sediment within the works area.</p>
				<p>The one-year modelling timeframe is also inadequate, particularly given compounding climate-change effects.</p>	<p>A 1-year return period storm was modelled to determine the seabed areas where fine sediment will accumulate for longer than a year without being resuspended and will thus have a predominantly muddy character. A more extreme storm with a longer return period (e.g. 10 or 100-years) and a larger wave height due to climate change would increase the resuspension and reduce the mud inside the marina. The model results showed that independent of the wave heights, the development has no significant impact on the bed shear stresses in the Water Club marina, thus no additional mud accumulation and no additional volume of maintenance dredging are predicted for the Water Club marina.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>Many mitigation measures are stated only in generic terms, with no method statements or assignment of responsibility.</p>	<p>The purpose of a scoping report is to identify impacts, which will be further assessed in the EIA. Mitigation measures are typically provided at a high level in a Scoping Report, while an EIA Report and its associated Environmental Management Programme will further specify responsibilities and methods.</p>
				<p>Finally, the report asserts that impacts on sediment transport and hydrodynamics will not extend beyond 300 metres from the development. This is contradicted by the fact that the Waterclub Marina—located within this distance—is directly influenced by the predicted flow patterns (see Figures 1 and 2).</p>  <p><b>Figure 1: Modelled and confirmed currents of the area of impact.</b></p>	<p>Bed shear stress as a driver of sediment accumulation within the Marina is specifically modelled and reported on, along with wave heights, sea temperatures, and currents. The more general comment in relation to the furthest extent at which a significant change in currents is detectable in the model outputs is less relevant than the specific conclusions in relation to the Waterclub, as reported in the PRDW report (Appendix G to the Scoping Report).</p>

Date	Method	Name	Interest	Comment / Query	Response
				 <p data-bbox="969 587 1574 646"><b>Figure 2: Distance of the V&amp;A Development from The Water Club Granger Bay Marina</b></p>	
				<p data-bbox="943 651 1093 675"><b>3. Discussion</b></p> <p data-bbox="943 683 1601 810">Earlier submissions (details to be cross-referenced by the EAP) raised key questions about sedimentation expected from land reclamation and seawall works. Those submissions highlighted:</p> <ul data-bbox="943 818 1601 1050" style="list-style-type: none"> <li>• A likely short-term increase in sedimentation during construction;</li> <li>• A need to quantify these effects; and</li> <li>• The necessity for mitigation measures and contingent liability, including agreements for additional dredging should impacts exceed predictions.</li> </ul> <p data-bbox="943 1058 1601 1153">While the Draft Scoping Report suggests that long-term sedimentation may remain unchanged, this assumption must be tested against:</p> <ul data-bbox="943 1161 1384 1257" style="list-style-type: none"> <li>• A complete bathymetric dataset,</li> <li>• Long-term modelling, and</li> <li>• Construction-phase risk scenarios.</li> </ul>	<p data-bbox="1624 683 2072 810">The earlier comments submitted to the EAP have been responded to in the comments and responses report forming part of the Scoping Report.</p> <p data-bbox="1624 850 2072 1121">The PRDW Wave and Hydrodynamic Modelling Report (Appendix G to the Scoping Report) includes a recent bathymetric survey (2022) covering the model domain, including Granger Bay Marina. Historical bathymetric changes and dredging records were also reviewed.</p>
				<p data-bbox="943 1265 1601 1329">The main critique remains that the Draft Scoping Report is insufficient in scope, particularly in failing to assess:</p> <ul data-bbox="943 1337 1400 1361" style="list-style-type: none"> <li>• Sedimentation during construction,</li> </ul>	<p data-bbox="1624 1265 2072 1425">The modelling results indicate that under the baseline scenario (without the proposed development), longer-term mud accumulation is expected within the Waterclub Marina, except</p>

Date	Method	Name	Interest	Comment / Query	Response
				<ul style="list-style-type: none"> <li>• Extreme weather events during construction—highly relevant in the energetic Table Bay environment, and</li> <li>• Long-term operational impacts under shifting climate patterns.</li> </ul>	<p>at the entrance and areas of scour caused by strong currents. This is consistent with historical dredging requirements.</p> <p>For the scenario including the proposed development, PRDW concludes that the development will not significantly alter bed shear stresses within the Waterclub Marina. Consequently, no additional mud accumulation and no increase in maintenance dredging volumes are predicted. Please refer to pp. 43–44 of Appendix G for details.</p> <p>The focus of the modelling is on long-term operational effects. Construction-phase impacts were not modelled at the Scoping stage but will be included in the EIA terms of reference for oceanographic and coastal engineering specialists. Mitigation measures for construction-phase sediment control will be detailed in the Environmental Management Programme (EMPr).</p>
				<p>The report and its appendices repeatedly claim there will be no impacts on hydrodynamics, wave climate, or sediment transport beyond 300 metres, yet the modelling (and common sense) demonstrate that the Waterclub Marina—well within this radius—lies directly in the affected zone. The contradiction is clear and unresolved.</p>	<p>The general comment regarding the 300 m radius was made in response to other I&amp;APs suggesting concerns for more distant parts of Table Bay (i.e. Milnerton and Woodbridge Island). The terms of reference for the hydrodynamic and oceanographic specialists included a focus on the</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p><b>4. Anticipated Impacts on Granger Bay Marina</b></p> <p>The Port of Cape Town breakwaters already divert a portion of the northward-moving sediment flux offshore. The Waterclub Marina, lying in a sheltered pocket of Granger Bay, therefore:</p> <ul style="list-style-type: none"> <li>• Experiences lower wave energy,</li> <li>• Has weaker and often recirculating currents, and</li> <li>• Functions as a local sediment trap.</li> </ul> <p>Consequently, dredging is required every 4–5 years. The proposed V&amp;A works will alter wave climate and circulation patterns and may, depending on exact configurations, introduce two broad categories of effect:</p> <p><b>4.1 Positive Potential Effects (Less Sand Infill)</b></p> <ul style="list-style-type: none"> <li>• Reduced wave energy at the marina entrance,</li> <li>• Reduced wave-driven sand transport,</li> </ul> <p>A “downdrift-starved” marina if longshore sand becomes trapped in the new public bay.</p> <p><b>4.2 Negative Potential Effects (More Mud/Silt Accumulation)</b></p> <ul style="list-style-type: none"> <li>• Slower flushing of the greater Granger Bay basin,</li> <li>• Increased deposition of very fine sediment from stormwater, suspended harbour mud, and organic matter,</li> <li>• A shift from sandy infill to soft mud, which requires different dredging measures.</li> </ul> <p>These effects may occur simultaneously. The net outcome cannot be predicted without the missing</p>	<p>Marina itself, and the specialists have therefore modelled the proposals in relation to the Waterclub. Their findings indicate negligible impact within the marina.</p> <p>The PRDW Wave and Hydrodynamic Modelling Report (Appendix G) specifically addresses sediment dynamics, wave climate, and circulation patterns in Granger Bay and the Waterclub Marina. Key findings relevant to the concerns raised are listed below.</p> <ul style="list-style-type: none"> <li>• The Waterclub Marina currently has a muddy seabed, except at the entrance and localized scour areas caused by strong currents due to harbour resonance. This is consistent with historical dredging records, which indicate periodic maintenance dredging is required.</li> <li>• Longer-term mud accumulation is predicted within the entire inner area of the Waterclub under existing conditions, except for the entrance and scour zones. This confirms the need for periodic dredging under current conditions unaffected by the proposed development.</li> <li>• The proposed development does not significantly alter bed shear stresses within the Waterclub Marina. Consequently, no additional mud accumulation and no increase in maintenance dredging volumes are predicted for the Waterclub.</li> </ul>

Date	Method	Name	Interest	Comment / Query	Response
				<p>data—and the Draft Scoping Report attempts such prediction regardless</p>	<ul style="list-style-type: none"> <li>• Wave heights inside the Waterclub are slightly reduced by the development.</li> <li>• Residual circulation within the Waterclub remains weak compared to the new development basin, but the development does not negatively affect flushing within the Waterclub.</li> <li>• The modelling confirms that the development does not result in measurable impact on the Waterclub's sedimentation patterns.</li> </ul> <p>Please refer to pp. 43 - 44 and Section 3.4 of Appendix G to the Scoping Report for details.</p>
				<p><b>4.3 Construction Phase</b></p> <p>The Draft Scoping Report does not analyse construction-phase impacts, yet:</p> <ul style="list-style-type: none"> <li>• Disturbance of seabed material,</li> <li>• Placement of revetments and breakwaters, and</li> <li>• Temporary changes in circulation will certainly increase suspended solids and irregular deposition patterns.</li> </ul> <p>The construction phase also carries the highest risk of extreme weather events, and the report provides no mitigation planning for these scenarios</p>	<p>Construction-phase impacts were not modelled, but will be addressed in the EIA. This will include:</p> <ul style="list-style-type: none"> <li>• Assessment of suspended sediment plumes during seabed disturbance and breakwater placement.</li> <li>• Mitigation measures for turbidity and sediment control.</li> <li>• Contingency planning for extreme weather events during construction.</li> </ul>
				<p><b>5. Conclusion</b></p> <p>This preliminary review identifies substantial, material shortcomings in the Draft Scoping Report, including:</p> <ul style="list-style-type: none"> <li>• Deficiencies in Process</li> </ul>	<p>As noted above, the EAP is not of the view that there have been any</p>

Date	Method	Name	Interest	Comment / Query	Response
				<ul style="list-style-type: none"> <li>Defective notification of directly affected property owners;</li> <li>Absence of an up-to-date bathymetric survey;</li> <li>Failure to obtain or assess historic bathymetric records.</li> </ul> <p><b>Deficiencies in Evidence</b></p> <ul style="list-style-type: none"> <li>No modelling of the construction phase;</li> <li>No assessment of extreme weather contingencies in Table Bay;</li> <li>A one-year modelling window inadequate for climate-driven variability;</li> <li>Unsupported claims that impacts will not extend beyond 300 metres.</li> </ul> <p><b>Deficiencies in Analysis</b></p> <ul style="list-style-type: none"> <li>Contradictory conclusions regarding sediment transport effects;</li> <li>Failure to quantify or assign responsibility for increased dredging costs;</li> </ul>	<p>deficiencies in process of notification, given the written undertaking by Ms Ponton to notify registered owners and the evident point that the Berthholders Association has submitted comments. The EAP remains committed to ensuring that all I&amp;APs have a reasonable opportunity to participate. Any potential I&amp;AP is invited to register their interest at any time via the project website, WhatsApp number, or email address. Further measures will be implemented at the commencement of public participation on the Draft EIA Report, including:</p> <ul style="list-style-type: none"> <li>Additional media and site notices;</li> <li>Direct notifications to potential I&amp;APs who have not yet registered; and</li> <li>Renewed engagement with Waterclub management to assist in either providing contact details for individual berth holders or distributing notifications internally.</li> </ul> <p>The purpose of the Scoping Report is to identify key issues for further assessment during the EIA phase. Many of the concerns raised have already been addressed in the specialist modelling undertaken by</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>Omission of potential ecological and visual impacts, including on the marina's Blue Flag status, swimming channel, and the aquarium's collection activities.</p> <p><b>Information Required</b></p> <p>From the Specialist Oceanography, Hydrodynamic and Sediment Transport Reports (Appendix D1), the BHA requires:</p> <ul style="list-style-type: none"> <li>• Full wave and current modelling with and without the development, including construction-phase modelling;</li> <li>• Predicted changes in sediment transport vectors near the marina entrance;</li> <li>• Estimated annual sedimentation rates within:               <ul style="list-style-type: none"> <li>○ the new public bay, and</li> <li>○ the existing Waterclub Marina basin.</li> </ul> </li> </ul> <p><b>Final Position</b></p> <p>Until the above information is provided, the Draft Scoping Report cannot be considered adequate for decision-making. The BHA reserves all rights and expects the EAP and the V&amp;A Waterfront to remedy the identified deficiencies, provide the missing data, and engage meaningfully on potential impacts, liabilities, and mitigation obligations.</p>	<p>PRDW (Appendix G), and others will be incorporated into the EIA terms of reference. Key clarifications are as follows:</p> <ul style="list-style-type: none"> <li>• A recent high-resolution bathymetric survey (2022) was included in the PRDW modelling, along with a review of historical bathymetric change and dredging records.</li> <li>• Directly affected stakeholders will be notified again in accordance with regulatory requirements.</li> </ul> <p>The PRDW modelling assessed long-term hydrodynamic, wave, and sediment transport effects under both baseline and development scenarios. Results confirm that the proposed development will not significantly alter bed shear stresses within the Waterclub Marina; therefore, no additional mud accumulation and no increase in maintenance dredging volumes are predicted. The PRDW findings indicate that while the Waterclub remains a sediment trap under existing conditions, the proposed development does not exacerbate this.</p> <p>Construction-phase impacts and extreme weather contingencies were not modelled but will be addressed in</p>

Date	Method	Name	Interest	Comment / Query	Response
					<p>the EIA by the EAP with additional specialist input where required.</p> <p>Ecological and visual impacts (e.g., Blue Flag status, swimming channel, aquarium activities) will be assessed by the appropriate specialists during the EIA.</p>
2025/12/15	Email	<p><b>City of Cape Town: Environmental &amp; Heritage Management</b></p> <p>Sandra Hustwick and Varsha Rajkumar</p>		<p><b>1. Background and Introduction</b></p> <p>V&amp;A Waterfront Holdings (Pty) Ltd. proposes to reclaim approximately 3.2 hectares of land from Table Bay for a new mixed-use residential and commercial development, west of Beach Road and north of Granger Bay Boulevard in Cape Town. The public commenting period for the pre-application scoping report was between 31 July and 1 September 2025. All of the comments that were received were collated and responded to within the Comments and Responses Report (Annexure H).</p> <p><b>2. Comments and Responses Report</b></p> <p>As per the latest MPT report granting approval to the request for additional bulk, the following is stated: - "Noting 2.5.3 below, the V&amp;AW is proposing the reclamation of approximately 3.2ha of land from Table Bay to accommodate new coastal public amenities and mixed use development to the north of the Granger Bay development area. The reclaimed land will be protected by a new permanent rock revetment and two ('east' and 'west') breakwaters forming a new protected bay</p>	<p>This description is accurate, and the confirmation that all previous comments have been responded to is noted.</p> <p><i>[explanatory note: The comments presented in the City's correspondence are tabulated in response to the pre-application comments and responses table. For simplicity only the latest 'City's response to the Applicant's response' is shown here]</i></p> <p>This reference to the MPT report is noted.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>measuring approximately 3ha in extent. The proposed reclamation area is shown in Figure 4 below."</p> 	
				<p>The MPT report states further: It is important to emphasise that the development proposal subject to the MPBL application process <u>does not include any land beyond the V&amp;AW's existing cadastral boundary</u> (i.e. the proposed land reclamation to the north of the Granger Bay development area does not form part of the development proposal under assessment in this report). The MPT report states, "The V&amp;AW's ultimate development vision includes development of additional reclaimed land in Granger Bay that is currently subject to an EIA process in terms of NEMA (refer to sub-section 2.5 above). However, it is again emphasised that the <u>subject application does not include any land beyond the V&amp;AW's existing cadastral boundary</u> as shown in Figure 8 below.</p>	<p>This is confirmed by the applicant to be correct, as the MPBL application included existing cadastral boundaries.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<div data-bbox="1077 188 1464 635" data-label="Figure"> <p>Figure 8: Area subject to the application (blue) and area excluded (yellow)</p> </div> <p data-bbox="943 651 1603 767">From the MPT report, it is clear that the area being reclaimed will not have any development rights as it is outside the existing cadastral boundaries. it will likely form an extension to the Granger Bay Precinct.</p> <p data-bbox="943 799 1603 916">Please confirm if this is the correct interpretation of the data. There is also no mention that the proposed reclamation area would have 'existing development rights' transferred to it once reclaimed.</p> <p data-bbox="943 948 1603 1032">Please clarify further if the proposed reclamation area will later be subject to an application for development rights in terms of the MPBL.</p> <p data-bbox="943 1038 1603 1214">"A significant implication of the discontinuation of the current 'package of plans' approach is that all existing approved development rights, including conditions contained in the MoA as well as the various precinct plan approvals (including conditions of approval), will fall away upon rezoning."</p> <p data-bbox="943 1246 1559 1273">Excerpt from the approved LUM case ID 1500109534.</p> <p data-bbox="943 1305 1603 1390">As per the applicant's motivation report, the additional 440,000m<sup>2</sup> of floor space is proposed to be distributed as described below and as illustrated in Figure 26 below:</p>	<p data-bbox="1626 651 2063 1007">The applicant confirms its understanding that the reclamation portion will not have any automatic bulk rights as it would need to undergo a town planning process in terms of the Municipal Planning By-Law. The subject area for the EIA includes both the proposed reclamation area as well as a portion of the existing terrestrial area of the V&amp;A Waterfront. Refer to figure E1 on page 3 of the Final Scoping Report.</p> <p data-bbox="1626 1038 2063 1305">The applicant confirms that the land use application referred to 440 000m<sup>2</sup>. None of this bulk may be allocated to the proposed reclaimed land. As stated above, a town planning process will need to be followed in terms of the Municipal Planning By-law to obtain rights for the reclaimed portion.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>Approximately 290,000m<sup>2</sup> or 66% is earmarked for the Granger Bay development area, which measures approximately 16ha in extent.</p> <p>The recently approved Rezoning with additional 400000m<sup>2</sup> bulk requires that Precinct plans still be submitted prior to SDPs and BPs for the Granger Bay Precinct. However, the reclaimed area is not currently within the rezoned Granger Bay Precinct, as it falls outside the V&amp;A Waterfront cadastral boundaries. Please clarify how the process will work for how land use rights will accrue to the proposed reclaimed land.</p>	
				<p>The City awaits the detailed site plans to be provided in the EIA Report showing provision of parking for boat trailers near the slipway.</p>	<p>Further details of the design of the proposed new slipway and ancillary facilities will be included in the EIA Report.</p>
				<p>No detail is given with regard to the setback of the proposed buildings. The report indicates that 'Building heights will be in accordance with parameters established in terms of the 2011 Heritage RoD and 2015 VIA. Within the view arc, no buildings will be higher than 21,5 m or approximately 5 floors.' It is assumed that the 'Coastal Sea Park Space' will act as a buffer to prevent coastal shadowing. The applicant must ensure that this buffer is of a sufficient width to prevent the shadowing effect of a 21,5 m tall building.</p>	<p>The detailed design of the individual buildings is not available at this stage. A land use management application will need to be followed in terms of the MPBL to obtain rights for the reclaimed portion in which more detailed design will be provided.</p>
				<p>No detail is provided in terms of public access control and open public access routes within the precinct. Facilitation of public access to the coast via dedicated and formal public access land is a legal requirement in terms of the Integrated Coastal Management Act. In this respect further information on the following is required:</p> <ul style="list-style-type: none"> <li>• Detailed design of where public access routes will be provided.</li> <li>• Detail on the management of public access land and control points inclusive of any closure times, if applicable.</li> </ul>	<p>The ICMA requirements in respect of coastal access apply only to land designated as coastal access in terms of section 18 of the act and the relevant municipal by-law.</p> <p>Movement routes and accessible parks and amenities are shown in the site layout plans included in the Scoping Report.</p>
				<p>Affordable housing provision has been included as a condition of the bulk rezoning application for the area within the existing V&amp;A Waterfront cadastral boundaries which was the subject of the rezoning. Please refer to the MPT report for further details.</p>	<p>All newly reclaimed land will be the subject of a future land use management application process in which details of the proposed land use mix will be provided to the municipality. The land use mix will take</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>Similarly, 10% of all housing in this reclaimed area should also be affordable housing and inclusionary housing.</p>	<p>into account the existing Waterfront property, where there is provision for affordable housing.</p>
				<p>Given that the existing marine environment is going to be reclaimed and developed it is imperative that the applicant gives back to the environment by providing a habitat for seabirds within the area.</p> <p>Similar to the Intaka Island Sanctuary created by the Century City Precinct. This in turn would enhance foot traffic within the area by attracting bird watchers and tourists to the area. It would also be an alternative to the retail outlets and restaurants that dominate the area.</p> <p>The list of marine species has been noted however there does not seem to be sufficient information with regard to seabirds. This may be due to the lack of seabirds within the study area owing to the previously mentioned high traffic and the highly transformed nature of the site.</p>	<p>Impact mitigation measures, including biodiversity offsets, are specified when they are required in relation to the nature and magnitude of an anticipated impact. We encourage the City to provide further detail on the species of seabirds whose habitat it considers to be threatened by the proposed development, since the specialist assessment of marine biodiversity impacts does not identify this as a significant concern.</p>
				<p>In terms of potential habitat loss, very little information is given in the Marine Impact Assessment on the impact of the reclamation on the Cape Kelp Forest ecosystem. The report instead focuses on the impact of the reclamation on the artificial dolosse habitat (a relatively small footprint) which will later be replaced. While fish and other mobile species within the pelagic open water habitat will be able to move to adjacent areas, the Cape Kelp Forest will not and will be lost as a result of the reclamation. This impact must be addressed in the Marine Impact Report.</p>	<p>The draft marine impact assessment will be reviewed in the EIA phase and updated if necessary, to respond to this comment.</p>
				<p><i>[In relation to the City's earlier comment stipulating daily water quality testing for recreational purposes and the EAP's response that the national water guidelines (DEA, 2012) specify testing every two weeks]:</i></p> <p>Noted. Bi-weekly water quality monitoring would be preferred. Water quality monitoring should also be undertaken within the precinct by the applicant. Detail on the water quality monitoring programme must be provided.</p>	<p>Water quality monitoring parameters and frequency will be stipulated in the environmental management programme for the proposed development.</p>
				<p>The current conceptual design, whilst indicating the presence of the repositioned slipway, provides no detail</p>	<p>As noted in the earlier response, details of the design of the proposed</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>on slipway width, nor the required ancillary parking area. The current conceptual design provided is insufficient to make an informed decision. On this basis a further detail is required in terms of the following:</p> <ul style="list-style-type: none"> <li>• Where will the slipway parking area be located within the precinct</li> <li>• Dimensions and carrying capacity (inclusive of vehicles with trailers) of the parking area to service the new slipway within the precinct</li> </ul> <p>The Oceana Power Boat Club currently charges R100 per launch. As Cape Town has so few public slipways (despite its long coastline) it is recommended that an attempt be made to reduce this fee by charging a reduced rate for smaller vessels to accommodate small scale fisher people belonging to vulnerable communities.</p> <p>The Heritage Management Section have no comments further to their previous submission on the pre-application report in August. The applicant's responses to this input is noted. The Heritage Management Section will comment on the HIA upon receipt of the draft EIA report (Refer to Annexure A.)</p>	<p>new slipway and ancillary facilities will be included in the EIA Report.</p> <p>The current launch costs are beyond the scope of this EIA, but it is noted that these rates apply to non-members and that regular users of the slipway are more likely to be club members. The slipway is managed and maintained by the club using these fees. Charges for future use cannot be determined at this stage, but the charges levied will consider current charges and the overall costs of managing the new facility.</p> <p>Heritage Management's absence of further comment at this stage in the EIA process is noted.</p>
2025/12/15	Email	<p><b>City of Cape Town: Coastal Management Department</b></p> <p>Darryl Colenbrander</p>		<p><b>Public Slipway parking area</b></p> <p>The current slipway (Oceana) is listed as a public launch site and as such access to, and the use of the slipway, is a legal requirement in terms of ICMA. The slipway has an ancillary parking area that facilitates access to, and use of the slipway. The parking area currently makes sufficient provision in terms of space for turning circles, towing of vessels/trailers and parking with such trailers. The current size of the parking area servicing the slipway is approx. 2600sqm and is often fully subscribed in peak periods. The parking area is located at the top of the current slipway to facilitate efficient and safe launching of vessels. The current slipway also has capacity (width</p>	<p>The absence of detail in the slipway designs presented with the Scoping Report is acknowledged; more detailed descriptions and designs will be included with the EIA Report in response to these queries. Trailer parking is expected to be accommodated within the podium block of the buildings nearest the slipway.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>wise) to accommodate dual launching or landing of vessels if required. The current conceptual design, which indicating the presence of the repositioned slipway, provides no detail on slipway width, nor the required ancillary parking area. The proposed precinct is characterised by dense mixed use commercial and residential development. On this basis a further detail is required in terms of the following:</p> <ul style="list-style-type: none"> <li>• Where will the slipway parking area be located within the precinct</li> <li>• Dimensions and carrying capacity (inclusive of vehicles with trailers) of the parking area to service the new slipway within the precinct</li> <li>• Oceana Power Boat Club are the current management entities of the slipway. Having a management entity is critical to the daily functioning of a public slipway. Please provide further information on the details of how the public slipway will be managed during operation stage of the precinct.</li> <li>• What will be the expected utilization rate for the slipway considering the changed wave and specifically surge conditions? Surge is known to cause difficult launching and retrieval conditions in the existing Oceana powerboat club slipway.</li> </ul>	<p>The critical need for effective operational management of the slipway is supported.</p> <p>The management of the slipway will operate on a similar basis to the Operational Management Plan for the existing slipway as endorsed by the City of Cape Town in December 2024.</p> <p>Coastal engineers refer to surge as long waves (typically periods of more than 30 s). Short wave heights (periods of less than 30 s) and long wave heights are expected to be similar for the new and existing slipways. However, the new slipway faces into the waves where the existing slipway experiences water movement both in line with and across the slipway. Water movement across a slipway makes using the slipway more difficult. In that regard the new slipway has an advantage.</p> <p>Based on the modelling, downtime on the slipway is estimated at approximately 5%. It should be noted that skill levels of boat users also influence this estimate. It should therefore be interpreted with care. Also, events where the slipway cannot be used will be associated with storms where the demand to go to sea will be much reduced.</p>

Date	Method	Name	Interest	Comment / Query	Response
					There is very little that can be done to avoid surge action under storm conditions, even in very sheltered harbours.
				<p><b>Public access and control to, and within, the precinct</b></p> <p>The proposed precinct will consist of dense mixed use commercial and residential development. No detail is provided in terms of public access control and open public access routes within the precinct. Facilitation of public access to the coast via dedicated and formal public access land is a legal requirement in terms of the Integrated Coastal Management Act. In this respect further information on the following is required:</p> <ul style="list-style-type: none"> <li>• In respect of private residential development, detail is required on where public control/access points will be located</li> <li>• Detail on where defined public access routes will be located within the precinct</li> <li>• Detail on the management of public access land and control points inclusive of any closure times, if applicable.</li> </ul>	<p>It is the applicant's intention to provide for full public access to the coastal walkways, squares, parks, and other facilities on the same basis that public access is currently permitted throughout the V&amp;A Waterfront.</p> <p>Private residential developments would be contained within buildings or development parcels, and no access control is proposed on the streets, squares and pedestrian routes that separate them.</p> <p>Closure of the breakwaters may be required at times when storm conditions make these areas unsafe for public access.</p>
				<p><b>Tidal pools and water quality</b></p> <p>In the event conceptual tidal pools are approved, the response in the Pre-application Public Participation Process Report that the tidal pools would be "...pumped system that ensures that water are replaced periodically". Further detail on the pumping system is required. Please note that water pumped from tidal pools back into the sea may require a permit.</p> <p>PRDW indicated that in terms of water quality for recreational use, modelling confirmed adequate circulation and flushing of the bay would take place. However in the event there is a discreet and substantial pollution discharge event i.e. through stormwater outlet within the bay, or whereby polluted water enters the bay</p>	<p>More detailed descriptions and designs will be developed subsequent to the EIA and included in land use planning applications. Should the need arise for additional permits these will be applied for in the prescribed manner.</p> <p>In the event of a discrete sewage-related pollution event the primary response would be to close the affected areas to contact recreation for the duration of the impact, while natural circulation occurs, and to monitor water quality periodically to</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>from offshore, immediate interventions will be required (as opposed to allowing for natural circulation to run its course). Detail on these interventions for public health and safety is required.</p> <p>Detail on water quality monitoring programme within the precinct as a public recreational facility is required.</p> <p>Clarity is required as to who will be the responsible entity for the ongoing management and maintenance of tidal pools which will be public facilities.</p>	<p>confirm when it reaches acceptable levels for contact recreation. Spill events involving hydrocarbons or similar pollutants would be subject to standard protocols for containment and recovery measures, in addition to the closures referred to above.</p> <p>Water quality monitoring frequencies and parameters will be specified in the environmental management programme developed in the EIA phase.</p>
				<p><b>In the impact table 6-3 it is stated that Impacts of the Granger Bay development breakwater on Longshore sediment transport – will have no impact.</b></p> <p>The scope of the Oceanographic study includes that the impact of sediment imbalances must be investigated. It is not clear on what results the aforementioned conclusion is based as sediment transport doesn't seem to have been discretely studied. If the bed shear results in the wave modelling study is the base of the statement, it should be clearly discussed. Although, as stated in the draft scoping report, the surrounding coast is mainly rocky, the seabed in the proposed development area is sandy and there are present indicators that sediment transport is a factor in the environment and the development area is impacted by it. Although the extent is not fully understood, sediment transport in the area is confirmed by the fact that the Granger Bay marina access channel is being silted up and requires dredging from time to time. Furthermore, given that sediment budget for the adjacent beaches of Sea Point is already low, any changes may further adversely impact the sediment budget and should be understood. The</p>	<p>Sediment transport has not been separately modelled, and the bed shear stress modelling by PRDW is the basis for conclusions in relation to the likely accumulation or otherwise of sediment within the bay and the adjacent marina.</p> <p>Conclusions by the oceanographic specialists on longshore sediment transport are based on expert opinion and on the model results that indicate that there will be no significant impacts on wave heights or currents (and therefore on coastal dynamics more generally) at a distance of 500m or more from the proposed development.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>component must be considered and discussed in terms of the following:</p> <ul style="list-style-type: none"> <li>• Will the proposed reclamation and breakwater construction material be placed over the existing sandy seabed or will it be first dredged and disallowed to keep in the interim budget?</li> <li>• What is the impact of proposed construction activities on the marine environment? What mitigation measures are proposed to contain such plumes during construction? If not mitigated for, sedimentation will be deposited in common launch sites and other areas</li> <li>• What is the impact of construction activities on the functioning of the V&amp;A desal brine discharge system?</li> </ul>	<p>The direct impacts of sedimentation during the construction phase will be the subject of impact assessments and mitigation measures to be included in the EIA Report and Environmental Management Programme. Mitigation measures to be implemented during reclamation works will be specified, and will include the use of geotextiles or similar means to contain sediment within the reclamation area.</p>
				<p>The scoping report does not clearly record accuracy of the Oceanographic study given that it was undertaken in winter and therefore does not include summer wave action. Similarly, the study does not include the impact of the proposed development on the existing wave action. Justification for the exclusion of summer wave action and the impact of the proposed development on the existing wave action is required. How will the proposed development impact the wave climate and related recreational activities? Navigation safety in relation to vessels entering and exiting the harbour must be considered.</p>	<p>The hydrodynamic modelling included simulations for two scenarios – a summer/autumn period and a winter/spring period. Summer wave action and navigation safety are reported on in the PRDW report (Appendix G) and the Oceanographic Impact Assessment (Appendix D).</p>
				<p>Has increased current velocity and surge risk been studied in the development along the southern side adjacent to the existing breakwater? How does the expected overtopping compare to the existing breakwater overtopping?</p>	<p>The numerical models address wave and current climates before and after construction of the new development. This includes the southern side of the Waterclub breakwater where changes are not considered significant. The development has no impact on waves seaward of the Waterclub breakwater and therefore no impact on overtopping.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>The scoping report refers to a 1 in 50-year wave event and associated overtopping up to 0.5m above the breakwater. How will this impact the proposed development and related recreational activities? Will this impact the proposed tidal pools? How does this compare to the 2018 study? Please clarify.</p>	<p>The proposed development is not an all-weather facility. Recreational activities will depend on tides, waves and wind. This applies to all recreational activities including the use of tidal pools. Risks relating to overtopping on pedestrians and swimmers will have to be actively managed.</p>
				<p>Has the effect of wave focussing and related increased setup and surge been studied in the funnel shaped area between the western breakwater and the southern breakwater of the Granger bay marine?</p>	<p>Yes, the numerical and physical wave models address potential wave focussing and increased setup/surge in all areas. Such potential increases were not observed in the area referred to here.</p>
2025/12/15	Email	<p><b>City of Cape Town Urban Planning and Design Department</b></p> <p>Margaret Murcott</p>		<p>Our comments were considered adequately; we have no additional comments at this time.</p>	<p>This confirmation is noted.</p>
2025/12/15	Email	<p><b>City of Cape Town Water and Sanitation Department</b></p> <p>Chanee Johnstone</p>		<p>With regards to the water demands estimated on page 121 of the Draft Scoping Report. The applicant needs to highlight that "The area under consideration does not comprise any commercial or residential area and therefore has no contribution to the existing allowable (available bulk)."</p> <p>The reason for the above is that residential/ hotel and most commercial type developments would yield a much higher water demand than what was quoted in the Civils report.</p>	<p>The area under consideration does include commercial and residential development. The proposed land use mix is as follows:</p> <ul style="list-style-type: none"> <li>• Residential: 50 700 m<sup>2</sup></li> <li>• Cultural: 1 200 m<sup>2</sup></li> <li>• Hotel: 11 400 m<sup>2</sup></li> <li>• Retail / Restaurant: 6 200 m<sup>2</sup></li> <li>• Retail / Light Industrial: 8 500m<sup>2</sup></li> </ul> <p>Section 4.4.3 of the Final Scoping Report has been updated to reflect these details. An updated capacity letter will accompany the Environmental Impact Assessment report, as this differs from the capacity confirmation previously received.</p>

Date	Method	Name	Interest	Comment / Query	Response
2025/12/15	Email	<p><b>City of Cape Town Electricity Generation and Distribution Department</b></p> <p>Leona Liebenberg</p>		<p>I refer to your memorandum and return herewith a copy of the sketch plan (Annexure 1) showing this Department's services.</p> <p>This Department has no objection to the proposal subject to the following conditions:</p> <ol style="list-style-type: none"> <li>1. The City's standard conditions, responsibilities and costs, in particular the principle of '1 erf, 1 supply', will be applicable. Thus consolidation and subdivision such that each precinct is a separate registered erf, with an independent electricity supply, is required. The V&amp;A may further subdivide any precinct into smaller erven, in which case each of these is to receive a separate supply.</li> <li>2. Where existing buildings on a shared erf have separate supplies, the erf is to be subdivided such that each independent structure is on a separate erf. Alternatively, the electricity supplies are to be consolidated such that any erf with multiple buildings has only 1 supply.</li> <li>3. The costs, comprising of connection fees and SNC (shared network cost) as per the tariffs and rates applicable at time of application will be imposed on each project or project phase as and when it is developed/implemented.</li> <li>4. Based on the anticipated power requirements it is likely that power cables installed to East Pier have sufficient capacity to cater for the proposed developments along their route, though construction of an additional substation room/building will be required. However, depending on the final power requirements of this portion of the V&amp;A, it may be necessary to install additional cables and substations. Proposed developments abutting Beach Rd will also require construction of at least 1 substation room/building and augmentation of capacity by installation of additional cables is likely</li> </ol>	<p>This principle and the following standard conditions are noted and will be the subject of future design of the electrical services for the proposed development.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>to be required. Developments of the eastern portion of the V&amp;A are to be supplied by means of installation of additional MV infrastructure from Gateway substation.</p> <p>5. Electrical infrastructure, established site camps, land-based storage and handling of sediment 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 applications on <a href="https://wayleave.capetown.gov.za">https://wayleave.capetown.gov.za</a></p> <p>Enquiries regarding Electricity Services Department comments may be directed to Mr. Michael Schmidt at michael.schmidt@capetown.gov.za</p>	
2025/12/15	Email	<p><b>City of Cape Town Solid Waste Management Department</b></p> <p>Gevarnia Petersen</p>		<p>In connection with the above proposal / development, I confirm that Solid Waste (Collections) as the Service Provider in the Area has NO OBJECTION to and has sufficient unallocated capacity to accept and collect and dispose of all types of waste to a designated licence landfill site. A good waste management system must be in place to handle all waste generated by the activities and to mitigate against negative impact on the environment. The generation of construction waste and waste during the operation phases should be recycled on site or re used to fill up other sites and clean builder's rubble can be disposed of at the nearest licenced under the guidance of the City of Cape Town. Refer to Annexure F for the standard building regulations: conditions for removal / collection of refuse.</p> <p><b>A. Standard building regulations: conditions for removal / collection of refuse</b></p> <p>Applicable to sectional title or cluster development, secured complexes, flat complex, shopping mall/centre (retail) or office complexes, factories and warehousing.</p> <p><b>U1 - Provision of areas</b></p>	<p>The department's confirmation of no objection and standard conditions for new developments are noted.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>Any building, excluding a dwelling house, in which refuse will be generated, shall be provided with an adequate centralised refuse room (which comply with the attached standards and guidelines for refuse storage areas). That the refuse room be provided in a position nearest to an access road (public road) and be accessible for the Council's refuse collection vehicles at all times as this vehicle and its crew members (Council staff) will not enter onto private property. Premises such as Places of Worship (churches, mosques and temples) and vacant land units do not require a refuse room however if the complex is large with function halls and large volumes of waste is generated or the vacant land is earmarked for (depending on the land use/zoning status) then a refuse room may be considered at the discretion of the Director: Waste Services.</p> <p>Should there be an existing refuse area in use to accommodate the changes, alterations or additions to the building for the storage of bins, then this area should be utilised for any additional bins required for this development, or provision should be made for added space.</p> <p><b>U2 – Access to area</b></p> <p>Council's refuse collection vehicles or its staff will not enter private property, therefore the removal of domestic solid waste is effected from the kerbside of a public street. The location of any area contemplated in regulation U1 shall be of such access thereto from any street for the purpose of removing the refuse is of the satisfaction of the local authority.</p> <p><b>B. Hazardous biological or chemical waste</b></p> <p>No hazardous, chemical or medical waste enters the general waste stream. Solid waste (collections) does not remove hazardous, chemical or medical waste. A private specialised waste company must be engaged for this purpose. These types of waste must be disposed</p>	

Date	Method	Name	Interest	Comment / Query	Response
				<p>of by a private specialised waste company in accordance with the minimum requirements for the handling classification and disposal of Hazardous waste (DWAR 1998) with the approval by the department of Health. The installation of cellular communications base stations does not require a refuse removal service and does not pose a health risk to the environment.</p> <p><b>C. Minimum requirements for single residential/rural units – access from public roads</b></p> <ol style="list-style-type: none"> <li>1. Council departmental or contracted waste collection teams will not enter private property; therefore the removal of domestic solid waste (general waste) is effected from the kerbside of a public street. Residential units located near mountain areas or areas frequented by baboons will be issued with baboon proof bins for the storage of waste at an additional cost as determined by Waste Services. The owner/s will have to place the refuse bins on the side walk (kerbside) of a public street on the scheduled day of refuse collection. In some instances a hardened washable surface in the road reserve, must be provided for bins depending on the number of units situated in a cul-de-sac that exceeds 20 metres and that does not have direct access for refuse collection vehicles. Please refer to the attached minimum requirements for vehicular access.</li> <li>2. Where internal roads are developed as private roads, or where an embayment is designed for the purposes as private residential town house complexes, a refuse room with an embayment for refuse vehicles will have to be provided. Please refer to the attached requirements for vehicular access.</li> <li>3. Applications by the owner/s to operate..... for more residential existing dwellings must make sure all Solid Waste Services. The owner/tenant are required to</li> </ol>	

Date	Method	Name	Interest	Comment / Query	Response
				<p>place the refuse bins on the Kerbside of a public street on the scheduled day of collection.</p> <p>4. Should the owner/s make alterations or additions to an existing dwelling or Subdivide the Property into 2 or more units, or make other changes that require Additional Provision for Bins / Bins, the owner/s must liaise with the Corporate Call Centre for Waste Services Enquiries on 086 010 3089 to make the necessary arrangements for the containers/ nearest to an Access Road (Public Road) on the Scheduled Day of Collection.</p> <p><b>D. Subdivision condition compliance to section 31:</b> Solid Waste Conditions must be clearly stated with the Attached "Annexure A" forms to avoid delays with the clearances given by Waste Services.</p>	
2025/12/15	Email	City of Cape Town Environmental Health Department		<p>The Environmental Health Department have no objection to the proposed development provided that sufficient dust emission management is undertaken during the construction phase (refer to Annexure G for further details). should any fuel- burning equipment (i.e. furnace, boiler, burner, incinerator, smoking device, wood-fired oven / pizza oven, commercial wood or charcoal fired braai, barbecue/grill or other equipment including a chimney); proposed to be installed, application for authorisation must be made in terms Section 11 of the City of Cape Town, Air Quality Management By Law 2016, as amended, prior to the installation of such fuel-burning equipment.</p>	<p>This confirmation is noted; dust management measures will form part of the construction-phase EMP.</p>
2025/12/15	Email	<p>City of Cape Town Environment &amp; Heritage Branch</p> <p>Sandra Hustwick &amp;</p>		<p>The City therefore supports the application in principle, provided that the issues identified above are addressed to the satisfaction of all departments in the Draft EIA.</p>	<p>This confirmation is noted; detailed responses are furnished above.</p>

Date	Method	Name	Interest	Comment / Query	Response
		Varsha Rajkumar			
2025/12/12	Email	<b>Department of Environmental Affairs and Development Planning</b>  Kraigen Govindasamy		1.The application form dated 7 November 2025 and received by this Directorate via electronic mail correspondence on 10 November 2025, the draft Scoping Report dated 10 November 2025 and received by this Directorate via electronic mail correspondence on 11 November 2025 and this Directorate's acknowledgement thereof dated 20 November 2025, refer.  Comment on the draft Scoping Report (dated 10 November 2025) is as follows: 2.1. Property description 2.1.1. The Surveyor General Code for Erf 177853, as referenced in the Draft Scoping Report, must be verified for accuracy and consistency with cadastral records.	The Surveyor General Code for this erf was not in the Draft Scoping Report, but is verified as C01600070017785300000, as stated in the Application Form.
				<b>2.2. Applicable listed activities</b> 2.2.1. You are reminded that only those activities applied for will be considered for authorisation. The onus is on the applicant to ensure that all of the applicable listed activities are applied for and assessed as part of the EIA process. Failure to include any applicable listed activities may invalidate the application.	
				2.3. Screening Report, Protocols and Specialist Assessments 2.3.1. This Directorate notes that a signed version of the Screening Report (dated 05 March 2025) has been submitted with the draft Scoping Report dated 10 November 2025.	The Screening Tool Report was the latest available, since at the time of submission of the application form there were various technical issues with the Screening Tool.
				2.3.2. This Directorate notes that a revised Site Sensitivity Verification Report ("SSVR") (dated July 2025) was submitted as part of the draft Scoping Report to this Directorate on 11 November 2025.	This is correct.

Date	Method	Name	Interest	Comment / Query	Response
				<p>2.3.3. This Directorate reminds the EAP that the scoping report must be fully aligned with the requirements of the respective Specialist Assessment Protocols. Please ensure that the Plan of Study for Environmental Impact Assessment includes a clear methodology and significance rating approach and the latest accepted protocol(s).</p>	<p>The Plan of Study includes a methodology and significance rating approach based on DEAT (2006), and refers to the protocols where relevant.</p>
				<p><b>2.4. Social and Gender Considerations</b>            2.4.1. You are reminded that the social context of the proposed development must always be considered. This includes the impact that the development proposal may have on the prevalence of HIV/AIDS, sexually transmitted infections ("STI") and Tuberculosis ("TB"), as well as equity and gender related concerns</p>	<p>The socioeconomic assessment includes consideration of relevant impacts.</p>
				<p>2.4.2. In addition, please ensure that the social assessment includes engagement with potentially vulnerable or marginalised user groups such as small-scale marine users, community-based ocean users and coastal-access dependent groups, to ensure compliance with the Promotion of Administrative Justice Act, 2000 ("PAJA") requirements for fair administrative procedures and meaningful engagement.</p>	<p>The terms of reference for the socioeconomic impact assessment have been updated accordingly, although it is not anticipated that any significant impacts will affect these groups given that the public slipway will be replaced in the proposed development, and that sheltered waters for water users to temporarily anchor will still be available.</p>
				<p><b>2.5. Climate Change</b>            2.5.1. One of the objectives of the Western Cape Provincial Spatial Development Framework published by this Department is to minimise the consumption of scarce environmental resources such as water, fuel, building materials, mineral resources, electricity and land. To this effect and as part of the efforts to reduce the effects of climate change, you must, as part of the EIA process, identify energy efficient technologies (e.g. the use of low voltage or compact fluorescent lights instead of incandescent globes, maximising the use of solar heating, etc.) that could be implemented for the</p>	<p>This level of detail would typically have been included in an EIA Report, rather than a Scoping Report, but the consideration of water-saving and energy-efficient technologies has been added to section 4.4.4 of the Scoping Report.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>proposed development. Considering that South Africa is a water scarce country and that many catchments in the Western Cape are already water stressed, you must also consider implementing the use of water saving devices and technologies (e.g. dual flush toilets, low-flow shower heads and taps, etc.) for the proposed development. This must be reported on in the Scoping Report.</p>	
				<p>2.5.2. Given the proposed reclamation and construction of new breakwaters, the Scoping Report must also include preliminary consideration of sea-level rise scenarios, storm surge risk, coastal erosion and sediment transport impacts, as required under the Integrated Coastal Management Act ("ICMA") and in line with the Department's climate resilience objectives.</p>	<p>The inclusion of a Climate Change Impact Assessment during the EIA will complement the assessments already forming part of the Scoping Report in respect of wave and hydrodynamic modelling. Preliminary consideration of climate-change related impacts has been added to section 6.2 of the Scoping Report.</p>
				<p>2.5.3. Given the proximity of the proposed development to the Robben Island Marine Protected Area and the presence of sensitive habitats (such as, kelp forests, mixed shore environments and rock lobster sanctuary areas), the Scoping Report (and the EIR) should provide a preliminary assessment of the potential direct and indirect impacts on marine biodiversity and ecosystem functioning, including cumulative impacts.</p>	<p>The Scoping Report already includes a preliminary assessment of marine biodiversity impacts, as well as a draft marine impact assessment report (refer to section 6.2 and to Appendix D2 of the FSR).</p>
				<p>2.5.4. Given that the proposed development involves the reclamation of coastal public property (CPP), the Scoping Report must clearly demonstrate compliance with Sections 7B and 7C of the ICMA by addressing the following: 2.5.4.1. Justification for reclamation: Provide a robust motivation for why reclamation is necessary, including a comparative assessment of reasonable alternatives.</p>	<p>The application for reclamation is a separate submission to the national Minister. Additional detail on compliance with sections 7A and 7C of the ICMA has been added to Sections 2.4.1 and 5.7 of the Scoping Report. Section 7B is not relevant to the application.</p>

Date	Method	Name	Interest	Comment / Query	Response
					Section 4.6 of the Scoping Report describes the consideration of alternatives.
				2.5.4.2. Alignment with the purposes of CPP: Explain how the proposal upholds the objectives of coastal public property, such as maintaining public access, safeguarding natural coastal systems, and promoting equitable use.	Section 2.4 of the Scoping Report has been expanded to explain how the proposal responds to the objectives of coastal public property.
				2.5.4.3. Mitigation of environmental impacts: Describe measures to avoid or minimise adverse effects on coastal processes and marine ecosystems.	Section 4.6 of the Scoping Report, and the specialist studies in Appendices D1 and D2, include the identification of mitigation measures.
				2.5.4.4. Regulatory requirements: Identify any additional authorisations or approvals required under the ICMA or related legislation.	Section 2.4 of the Scoping Report identifies these authorisations.
				2.5.5. The Draft Scoping Report must contain sufficient detail to enable the competent authority to evaluate the application in accordance with the mandatory considerations set out in Chapter 6 of the ICMA.	The Draft and Final Scoping Reports contain sufficient detail (at the level of scoping) to allow for this evaluation. Where necessary additional details may be provided during the EIA Process.
				<p><b>2.6. Public Participation</b></p> <p>2.6.1. Please be advised that a comment from this Department's Coastal Management Directorate, the City of Cape Town: Environmental Resource Management Unit, CapeNature, SANParks and the Department of Water and Sanitation must be included in the Scoping Report.</p>	<p>The Department's Coastal Management Directorate, CapeNature, and the national Department of Water and Sanitation were both provided with an opportunity to comment during the pre-application and Scoping public participation processes, but have not done so. It is therefore assumed that they have no comment at this time.</p> <p>The City of Cape Town and SANParks have commented on the Draft Scoping Report and their comments</p>

Date	Method	Name	Interest	Comment / Query	Response
					are included in the Comments and Responses Reports.
				2.6.2. Please ensure that adequate engagement with all coastal user groups, including recreational clubs, coastal access user communities and marine recreational sectors, is demonstrated.	The engagement process to date is described in Chapter 7 of the Scoping Report, and has benefited from extensive media attention as well as incorporating direct notifications to identified user groups including the Oceana Power Boat Club. It is not clear what is meant by 'coastal access user communities' but during the EIA public participation process further notifications may be issued if the competent authority is aware of other potential interested and affected parties not already consulted.
				2.6.3. The Scoping Report must demonstrate not only that public participation was undertaken, but also how issues raised by Interested and Affected Parties have been incorporated into the Scoping process, in line with the requirements of PAJA.	Section 7.8 of the Scoping Report demonstrates how issues raised by I&APs have been considered, incorporated, and/or responded to.
				2.6.4. Please ensure that all proof of having conducted the relevant PPP in terms of Regulation 41 and Chapter 6 of the EIA Regulations, 2014 (as amended), is submitted to this Department. This must be included in the Scoping Report to be submitted as part of the application for Environmental Authorisation	Appendix I to the final Scoping Report includes the proof of having conducted the PPP, and is submitted only to the Department due to the inclusion of personal information.
				<b>2.7. General</b>	
				2.7.1. Please note that the Scoping Report must contain the duly dated and signed declarations of the applicant and Environmental Assessment Practitioner.	The Applicant and EAP's declarations are included with the final Scoping Report.
				2.7.2. Please ensure that the Final Scoping Report complies with all requirements of Appendix 2 of the EIA Regulations, 2014 (as amended), including the requirement to identify and rank potential impacts and	Table 1-2 of the Scoping Report indicates how these requirements are met.

Date	Method	Name	Interest	Comment / Query	Response
				<p>provide an adequate preliminary description of feasible mitigation measures.</p> <p>2.7.2.1. The Draft Scoping Report contains descriptions of impacts but does not yet provide sufficient detail on significance ranking, which must be rectified in the Final Scoping Report.</p> <p>3. You are reminded that the Scoping Report must be submitted within 44 days of the date of receipt of the application by the Department. Therefore, the Scoping Report must be submitted to this Department on or before 15 January 2026.</p> <p>4. 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.</p> <p>5. Kindly quote the above-mentioned reference number in any future correspondence regarding this application. The Directorate reserves the right to revise or withdraw comments or request further information based on any information received.</p>	<p></p> <p>The significance of impacts has been expanded upon in section 6.2 of the Scoping Report, noting that the EIA Report will include more formal assessments of impact significance.</p> <p>The final Scoping Report has been submitted within the regulated timeframe.</p> <p>This prohibition is noted by the applicant.</p> <p>The application reference number has been added to the final Scoping Report.</p>
2025/12/12	Email	<p><b>Department of Forestry, Fisheries, and the Environment (DFFE), Branch Oceans &amp; Coasts (O&amp;C)</b></p> <p>Tabisile Mhlana</p>		<p>Based on the submitted section Draft Scoping Report, the Branch O&amp;C would like to register as an Interested &amp; Affected Party and further presents the comments stipulated below for consideration. Please note the recommendations for your consideration:</p> <ol style="list-style-type: none"> <li>1. The Branch notes the EAPS response, as detailed in the Comments &amp; Responses Report to comments previously submitted for the pre-application in comments dated 01/09/2025 EDMS Ref:263782. These comments aim to address the updated version.</li> </ol>	<p>The Oceans and Coasts Branch is included in the database of organs of state to be consulted on an ongoing basis.</p>

Date	Method	Name	Interest	Comment / Query	Response
				<p>2. The report indicates that the institutional arrangements for managing the new slipway have not yet been finalised, although the needs of all slipway users will be taken into account. The Coastal Management Unit of the DEA&amp;DP should be engaged during the development of the slipway management framework to ensure that public access obligations are fully upheld.</p>	<p>The DEA&amp;DP's coastal management directorate is similarly being consulted, and will be included in any future engagements about the operational management of the proposed relocated public launch site and slipway.</p>
				<p>3. In the subsequent report, the specifications of the proposed new slipway should be included to clarify whether it will adequately accommodate the anticipated increase in users should the proposed development become operational. The Branch supports retention of the existing slipway to ensure uninterrupted access during the construction period, by requiring that the new slipway be fully constructed and operational before the current one is closed.</p>	<p>Further details of the proposed slipway will be included in the EIA Report. The Department's support for continuous access to a slipway during construction is noted.</p>
				<p>4. 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>Activities will not commence prior to authorisation.</p>