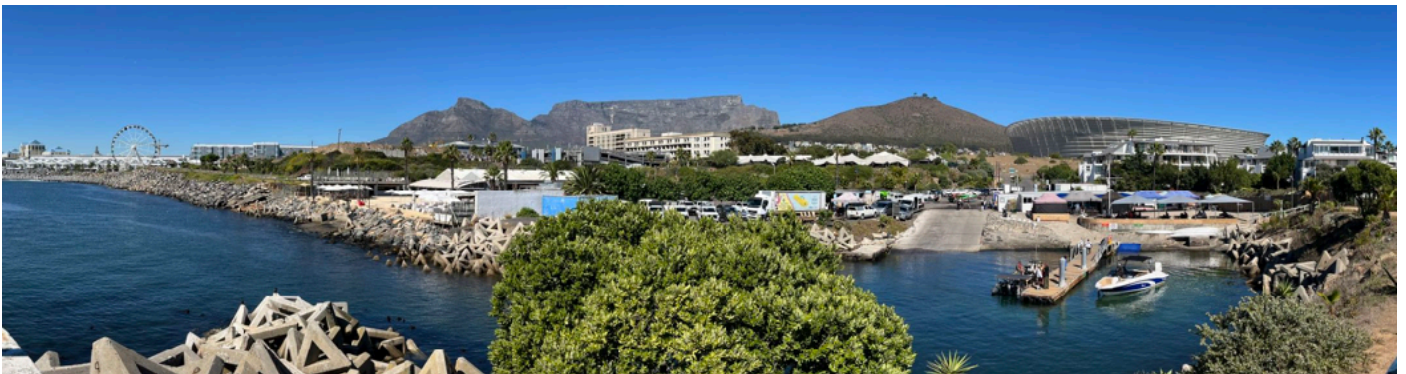


PROPOSED GRANGER BAY PRECINCT DEVELOPMENT, V&A WATERFRONT, CAPE TOWN

Visual Impact Assessment (ver 1.4)

March 2026



Prepared for:
Infinity Environmental
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Executive Summary

This Visual Impact Assessment is of the Granger Bay Precinct Development. The proposals include the reclamation land and the development of several mixed use packages (11 fall within the study area), publicly accessible spaces and the creation of a protected bay by extending breakwaters into Granger Bay.

The information provided included block models of proposed buildings with little architectural details. 3-D models were provided from certain relevant view points. Two Alternatives are assessed namely the No-Go Alternative and the 2025 Preferred Alternative.

HWC requested a Visual Impact Assessment (comparative assessment: approved vs proposed) and including assessment of the accessibility to the water's edge.

Most of the mitigation measures from the previously prepared VIA (Lawson and Oberholzer, 2017) have been included in the updated Granger Bay Phase 2 Development Control Document.

The required building height restriction of 21,5m above MSL in the 'Arc of Fire' north of Fort Wynyard and the 30m wide view corridor to Table Bay have been explicitly adhered to and included in the Granger Bay Phase 2 Development Control and Urban Design Guideline documents and are reflected in the Precinct Plans.

Rating methods used were provided by the Environmental Consultant. With most of the mitigation measures being satisfied, the significance level of visual impact should be medium before mitigation. However, the level of detail of the buildings, currently just shown as blocks, results in the confidence level not being high enough to reduce the level of mitigation. So the significance of visual impacts before mitigation remains medium to high and after mitigation would be medium.

Accessibility to the waters edge is well provided for with a new slipway for commercial and recreational boats and a pathway, linking Sea Point to the Waterfront, continuing along the coastal edge through this precinct.

Views down the corridor in front of Fort Wynyard need to be improved by stepping back the buildings on either side, the view of Table Bay from Granger Bay Boulevard needs to be retained and not obscured by podiums on Packages 13 and 14.

The Scenic resources of the site can be described as predominantly vacant and derelict and are moderately rated, based on coastal setting and other visually significant aspects.

The visual criteria rating for the proposed development are as follows:

The visibility will be Moderate from the south and High from the north, i.e. visible from an Intermediate area to visible from a large area e.g. several square meters.

The visual exposure will vary between High and Low, i.e. being clearly noticeable, recognisable to not particularly noticeable.

The visual sensitivity is high, i.e. it is a highly visible and potentially sensitive area in the landscape as a result of heritage and visual resources.

The visual sensitivity of receptors is moderate to high, i.e. sporting or recreational areas, or places of work - residential areas, scenic routes, nature reserves.

The VAC is low, i.e. little screening by topography or vegetation.

The visual intrusion will be moderate, i.e. it will partially fit into the surroundings but be clearly noticeable.

The scenic resources of the site can be described as predominantly vacant and derelict urban land and is **moderately** rated, based on coastal setting and other visually significant aspects.

The **Potential Visual Impacts** will occur during the construction and operation phase and are tabled below including significance before and after mitigation

| | NO GO Alternative | | 2019 Approved Scheme | | 2025 Scheme | |
|---|--------------------------------|-------------------------------|--------------------------------|-------------------------------|--------------------------------|-------------------------------|
| | Significance before mitigation | Significance after mitigation | Significance before mitigation | Significance after mitigation | Significance before mitigation | Significance after mitigation |
| <u>Visibility of construction activities.</u> | | | | | | |
| | NA | NA | Medium - High (-) | Medium (-) | Medium - High (-) | Medium (-) |
| <u>Change in Visual Character and Impact on Scenic Resources</u> | | | | | | |
| | Medium (-) | Medium (-) | Medium - High (-) | Medium (-) | Medium - High (-) | Medium (-) |
| <u>Sense of Place</u> | | | | | | |
| | Low (-) | Low (-) | High (-) | Medium (-) | Medium - High (-) | Medium (-) |
| <u>Visual intrusion of night lighting/light pollution</u> | | | | | | |
| | Low (-) | Low (-) | Medium (-) | Low (-) | Medium (-) | Low(-) |
| <u>Cumulative Impact</u> | | | | | | |
| | Low (-) | Low (-) | High (-) | High (-) | High (-) | High (-) |

Mitigation measures include:

- Allow views from Dover apartments and down Granger Bay Boulevard
- Minimise visual intrusion of roads, parking areas and lighting
- Appoint a Professional registered Landscape Architect to draw up a Landscape Development Plan for approval
- Building forms and finishes to approved architectural guidelines
- Include visual impact mitigation measures in construction EMP
- Review visual assets at Site Development Plan stage

The proposed Granger Bay Precinct Development has a greater footprint than the approved 2019 proposal, because there is development proposed on land to be reclaimed, but the Development Control Document has included the previously proposed mitigation measures which has resulted in a buildings responding to the surrounding urban development, e.g. higher buildings at Beach Road and Granger Bay Boulevard and buildings cascading down to the coast.

The proposed revetments and bay, good public access to the coast, recreation opportunities, continuous pedestrian and cycle ways from Beach Road to the V&A Waterfront with good street level building interface, sufficient access to the slipway for boat launching provides for a potentially positive development but more development detail is required, including architectural details, before a confident positive visual impact is achieved. However, it is accepted that development must happen on the site.

1. Name, Expertise and Declaration

1.1 Name

Megan Anderson, of Megan Anderson Landscape Architects, is a self-employed Landscape Architect who has been consulting in the Western Cape since 1991, to clients from the public and private sector.

1.2 Expertise

Megan Anderson's projects range from:

- visual impact assessments (VIAs) of proposed developments for EIA and HIA processes;
- environmental and landscape policy and planning;
- upgrading and rehabilitation of natural systems;
- planning and implementation in heritage and cultural precincts; and
- planning, design and landscape development in residential and urban areas and community projects.

PRINCIPAL AGENT: Megan Anderson Registered Professional Landscape Architect
(PrLArch) BLArch (UP) 1983 MILASA

REGISTRATION OF PRINCIPLE AGENT

1994 South African Council for Landscape Architect Professionals (94063)
1992 Institute of Landscape Architects of South Africa (P217)

QUALIFICATIONS

1983 University of Pretoria Bachelor of Landscape Architecture

VISUAL IMPACT ASSESSMENT EXPERTISE

Megan Anderson has been doing Visual Impact Assessments (VIA's) since 1989 when working for OvP and BOLA. Since then, she has completed more than 100 VIA's for a variety of developments including mining, harbours, wind and solar farms, communication towers, commercial and residential developments.

1.3 Declaration of independence

I Megan Anderson declare that I am an independent consultant and have no business, financial, personal or other interest in the proposed V&A Granger Bay project in Cape Town in the Western Cape, application or appeal in respect of which I was appointed, other than fair remuneration for work performed in connection with the activity, application or appeal. There are no circumstances that compromise the objectivity of my performing such work.



MEGAN ANDERSON

Megan Anderson Landscape Architects

Professional registration number: SACLAP - 94063

2. Introduction

2.1 Background to this report

The V and A Waterfront Holdings (Pty) Ltd (V&AW) propose to develop the Granger Bay Precinct of the V&A Waterfront.

The proposed 2025 development scheme for the Granger Bay Precinct includes the following main components:

1. Replacement of coastal defence structures: associated revetment, breakwaters, and Land Reclamation.
2. Mixed-use development packages.
3. Public Open Spaces, Boulevards, Streets and Pedestrian/Cycle ways

The proposal has triggered requirements of the following Acts:

- The National Environmental Management Act (NEMA), 107 of 1998 - which requires a full Scoping and Environmental Impact Assessment (EIA) process;
- National Environmental Management: Integrated Coastal Management Act (ICMA), - ministerial pre-approval and parliamentary ratification required for the reclamation of land from the sea for private purposes;
- National Heritage Resources Act (NHRA), 25 of 1999 - HWC require an HIA, Archaeological Impact Assessment (AIA) and Visual Impact Assessment (VIA) for this project with the AIA also requiring approval from South African Heritages Resources Agency (SAHRA)

Infinity Environmental (Pty) Ltd. is appointed by V&AW to manage the Scoping and Environmental Impact Assessment process for the proposed development.

Cindy Postlethwayt is the Heritage Practitioner who has been appointed to manage the HIA process. In response to the NID for the proposed 2025 Granger Bay Precinct proposal, HWC have requested that the Visual Impact Assessment compare the previously approved 2019 Granger Bay Precinct scheme to the 2025 proposed scheme.

Megan Anderson is appointed to prepare the Visual Impact Assessment for both the HIA and the EIA.

2.2 Terms of reference

The Terms of Reference for the Visual Impact Assessment Study and Report was provided by Infinity Environmental and is discussed briefly below, the full TOR can be found in Appendix A of this Report.

- The VIA is required to take account of and report on, if relevant, Section 63 of the ICMA factors including:
 - Consistency with the purpose of coastal public property and coastal access,
 - Socio-economic impacts,
 - Impacts of coastal processes on the activity and vice versa,
 - Whether the activity is by its nature required to be located in the coastal environment, and
 - Whether public services will be provided by the activity.

- The VIA should be conducted in accordance with 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 Management Act, 1998, when applying for environmental authorisation (GN 320 and 1150 of 2020) as well as the DEA 2006 Guideline on Assessment of Alternatives and Impacts where there are no procedures legislated for the specific specialist study. Where the 2006 Guideline conflicts with the 2020 Procedures, the latter shall be followed.
- Outline the Approach to the study, assumptions, limitations and sources of information must be identified,
- Description of the affected (visual) environment or baseline, drawing on Lawson and Oberholzer VIA at site level and the wider region, providing an indication of the visual sensitivity (ability to tolerate disturbance),
- Identify and assess visual impacts (direct, indirect, cumulative) during all phases (Construction, Operation, Closure) and identify fatal flaws,
- Recommend practical mitigation measures or management measures and monitoring/ review programmes,
- Alternatives to be assessed are the 2025 scheme and the NO-GO alternative, and as required by HWC, the 2019 scheme (In response to a Notification of Intent to Develop submitted to Heritage Western Cape, a Heritage Impact Assessment was required which must make specific reference to a Visual Impact Assessment [comparative assessment: approved vs proposed] and including assessment of the accessibility to the water's edge.)
- Indicate with motivation, the preferred alternative

2.3 Approach and Methodology

The Visual Impact Assessment follows the Western Cape's DEA&DP's Guideline for Involving Visual and Aesthetic Specialists in EIA Processes. This document explains *'The term 'visual and aesthetic' is intended to cover the broad range of visual, scenic, cultural, and spiritual aspects of the landscape. However, for the purpose of brevity, the term 'visual' is used in the text.*

The PGWC's DEA&DP's "Guidelines for involving visual and aesthetic specialists in the EIA process" provides 'triggers' (i.e. characteristics of either the receiving environment or the proposed project), which indicate that visibility and aesthetics are likely to be 'key issues' and may require specialist input. Further details on how the characteristics of the site and project are probable triggers which suggest potential visual issues can be found in Appendix B.

Existing information has been reviewed including the:

- previous VIA Report by Lawson and Oberholzer;
- Draft Heritage Impact Assessment by Cindy Postlethwayt;
- The V&AW Urban Design Guidelines (with revetments),
- Granger Bay Phase 2 Development Controls and
- 3-D computer generated figures of the proposed development.

The Visual Framework/Baseline Study, was initially prepared for the HIA which updated the Lawson& Oberholzer study (2017). This identified the visual opportunities and constraints of the site.

A site visit and inspection was made together with Cindy Postlethwayt, Heritage Practitioner, on 10 April 2025. The site and surrounds were photographed, in particular from most of the previous viewpoints.

A second site visit was made in early November to verify some information and take photographs from Fort Wynyard.

A third site visit was made in January 2026 with the Urban Designers from the Waterfront Office where the proposed development was discussed.

A number of documents have been provided by the V&A Waterfront with regards the proposed development including Urban Design Guidelines, Development Controls and 3-D Models of the proposed development. These have been reviewed and assessed together with the proposed development plan.

2.4 Assumptions and Limitations

Only building envelopes indicating building heights and bulk have been made available for the preparation of the VIA. No detail has been provided of the architectural elevations and finishes for the proposed development, nor the spaces between buildings, such as parking and landscaping. No architectural guidelines are available. However a condition of rezoning approval (January 2026) is that all SDPs must be submitted in terms of Item 123 the CoCT's DMS, which inter alia must include:

- (d) the massing, position, use and extent of buildings;
- (e) sketch plans and elevations of proposed structures, including information about external finishes;
- (f) cross-sections of the site and buildings on site.

It is assumed that the information and assessments supplied by others are accurate and a fair representation of the circumstances or proposed development.

Infrastructure information such as electricity, water, waste and storm water has not been provided therefore not addressed in this report.

3 Description of the project in terms of visual considerations

3.1 Site location

The site is situated on Erf 173712 and portion of Erf 149294 Cape Town, also known as Granger Bay Precinct, located immediately to the west of the V&A Waterfront, about 2km from the City's CBD. Access is via Granger Bay Boulevard and Beach Road.



Figure 1 The V&A Waterfront location in Cape Town (Source: V&A Waterfront)

The location of the Granger Bay Precinct Development is indicated on the below Figure provided by the Environmental Practitioner, Infinity Environmental. It is a coastal site overlooking Table Bay.

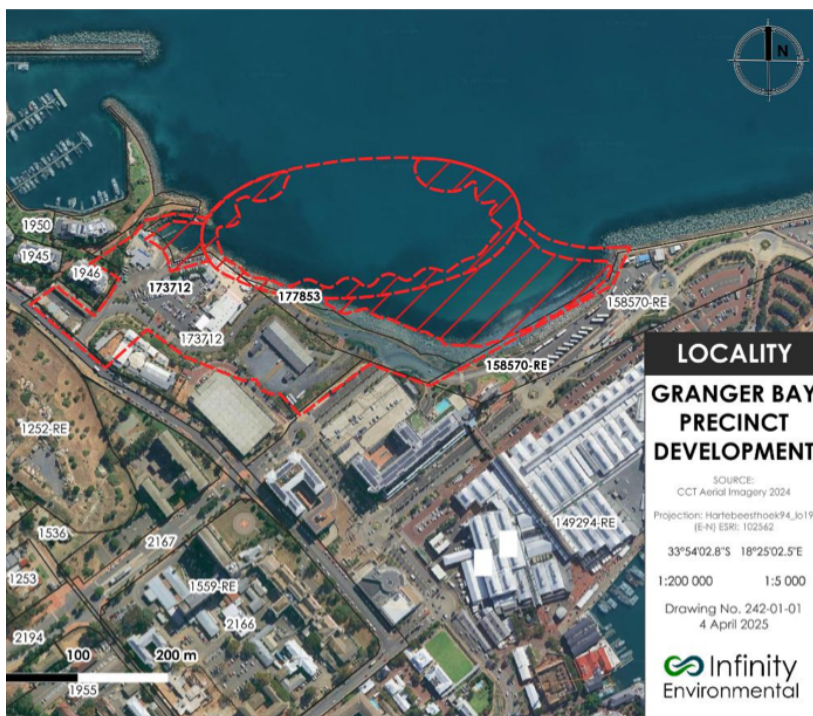


Figure 2 The Granger Bay Precinct within the V&A Waterfront (Source: Infinity Environmental)

The Granger Bay Precinct site is located between:

- the coast in the north, with views across Table Bay towards Robben Island and Blouberg in the distance;
- Beach Road in the south beyond which lies Somerset Hospital buildings, Fort Wynyard, Cape Town Stadium and Signal Hill which is about 2km to the south and overlooks the site;
- Granger Bay Boulevard in the east beyond which is a Parking Building, Breakwater Boulevard and beyond that the Victoria Wharf Retail Centre and Table Bay Hotel; and
- The Water Club and The Radisson Hotel to the west



Figure 3 Approximate footprint position of site, shaded red in context of existing development

3.2 The Proposed 2025 Development - The Preferred Alternative

The proposed 2025 development scheme for the Granger Bay Precinct is discussed and illustrated below.

3.2.1 Replacement of coastal defence structures: associated revetment, breakwaters, and Land Reclamation.

The proposed development centres on the reclamation of approximately 3.2 hectares of land from Table Bay to accommodate new coastal public amenities and new mixed-use development. This reclamation will be protected by a new permanent rock revetment and two breakwaters forming a new protected bay, approximately three hectares in extent. The west breakwater will extend approximately 90 m into Table Bay, and the east approximately 140 m. A revetment connecting the two breakwaters will be approximately 540 m long.

The eastern and western breakwaters protrude into the sea, providing protection for the areas within the bay. The two breakwaters and middle revetment are armoured slopes that will back onto the land once the reclamation is complete.

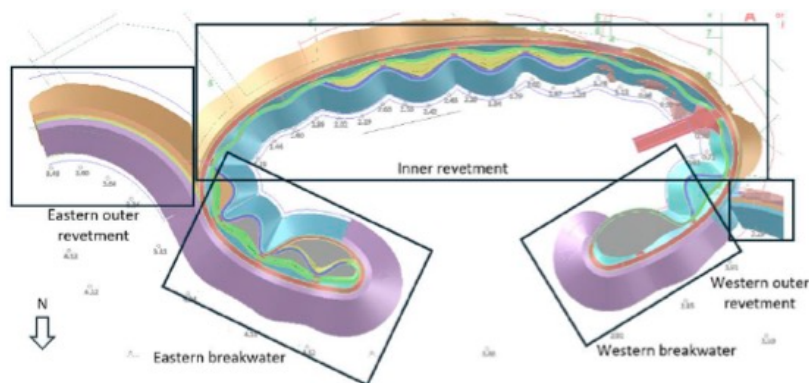


Figure 4 The proposed revetments for land reclamation (Source: V&A)

New public amenities will include the new bay, sheltered waters for boating, kayaking, and swimming. Land-based amenities will include a coastal public walkway, a slipway, a fixed quayside, a landscaped promenade, tidal pools, pedestrian paths, and open areas.



Figure 5 The swimming amenities and boating zone (Source: V&A/Heatherwick's Studios)

3.2.2 Mixed-use development packages.

There are 11 building packages, Packages 1,2 and 6 -14. The descriptions are based on urban designs provided by the applicant.

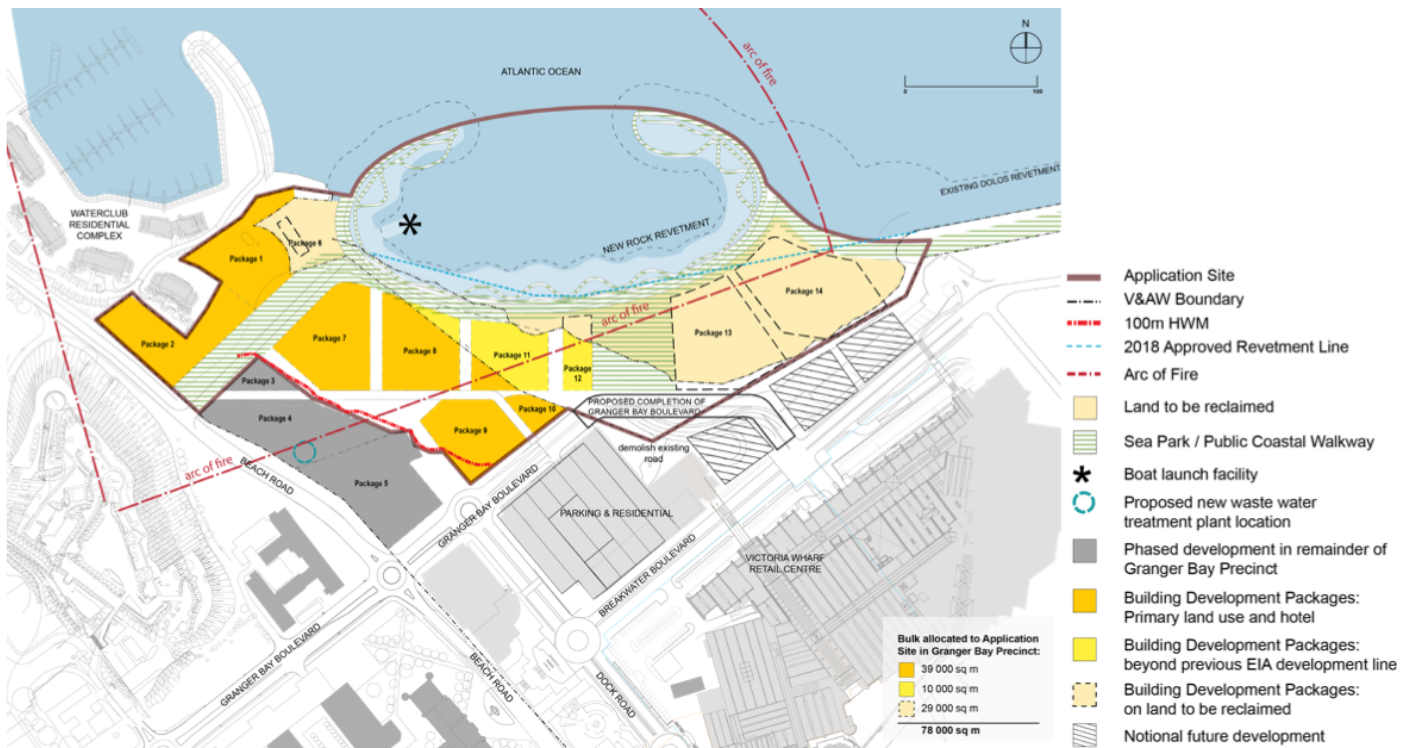


Figure 6 The proposed Building Packages (Source: V&A)

3.2.2.1 Package 1, 2 and 6

- The height of buildings is limited to 21.5m above mean sea level [MSL] to maintain key views within the arc of fire
- Ground floors of buildings edging the 30m view corridor, and the coastal walkway to be treated sensitively in relation to the public realm
- Buildings edging the Water Club Residential Complex should be of a similar height, scale and massing
- Buildings along Beach Road to include interface conditions on the lower levels that create a positive walking experience along Beach Road

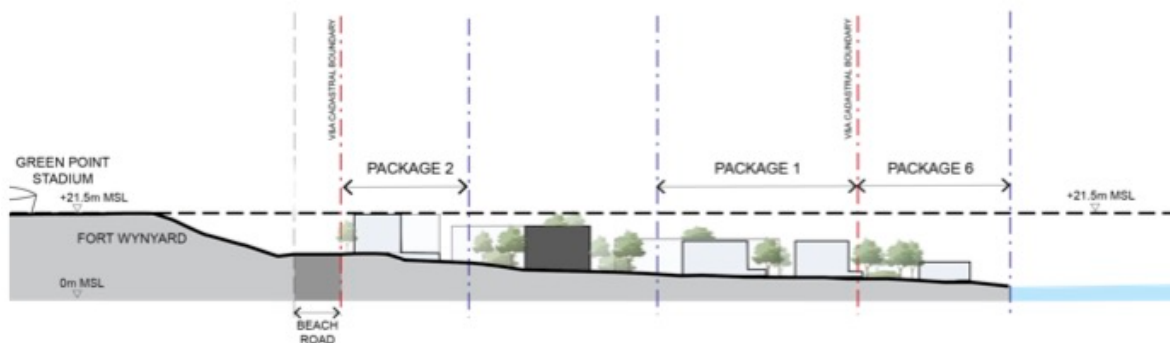
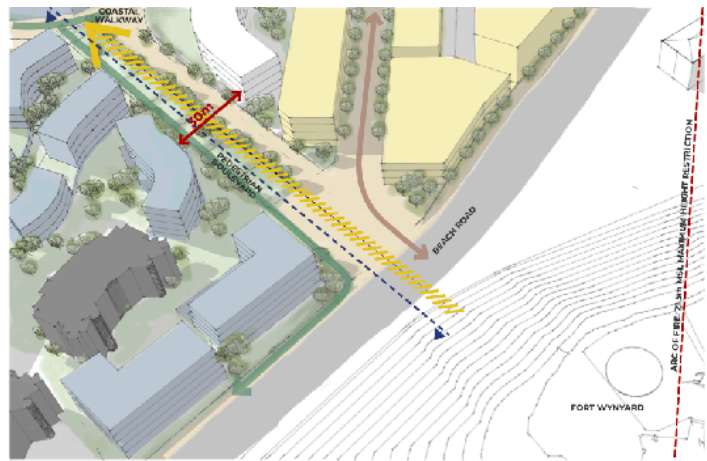


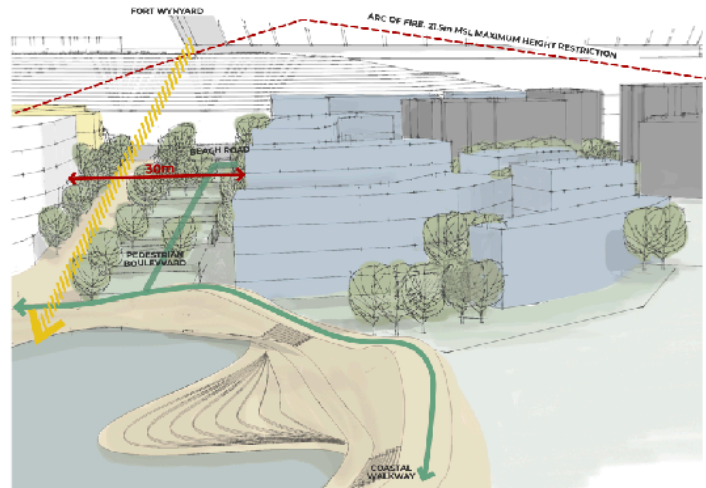
Figure 7 Section from Fort Wynyard to the ocean indicating the 21,5m MSL height datum in the Arc of Fire (Source: V&A)



- Primary public pedestrian route
- Primary view corridor
- 30m view corridor width
- Internal link
- Arc of fire 21.5m MSL height limit
- Existing Waterclub
- Packages 1, 2 & 6
- 2023 Proposed development outside the EIA amendment study area



VIEW 1, PACKAGE 1, 2 & 6 APPLICATION OF DESIGN CONSTRAINTS



VIEW 2, PACKAGE 1, 2 & 6 APPLICATION OF DESIGN CONSTRAINTS



VIEW 3, PACKAGE 1, 2 & 6 APPLICATION OF DESIGN CONSTRAINTS

Figure 8 Views 1, 2 and 3 of Packages 1, 2 and 6 (Source: V&A)

3.2.2.2 Package 7, 8, 11 and 12

- The height of buildings located within the Arc of Fire is limited to 21.5m above MSL
- The lower levels of buildings alongside the coastal public walkway should make use of podium architecture
- The use of internal courtyards is encouraged to optimise solar gain onto building facades

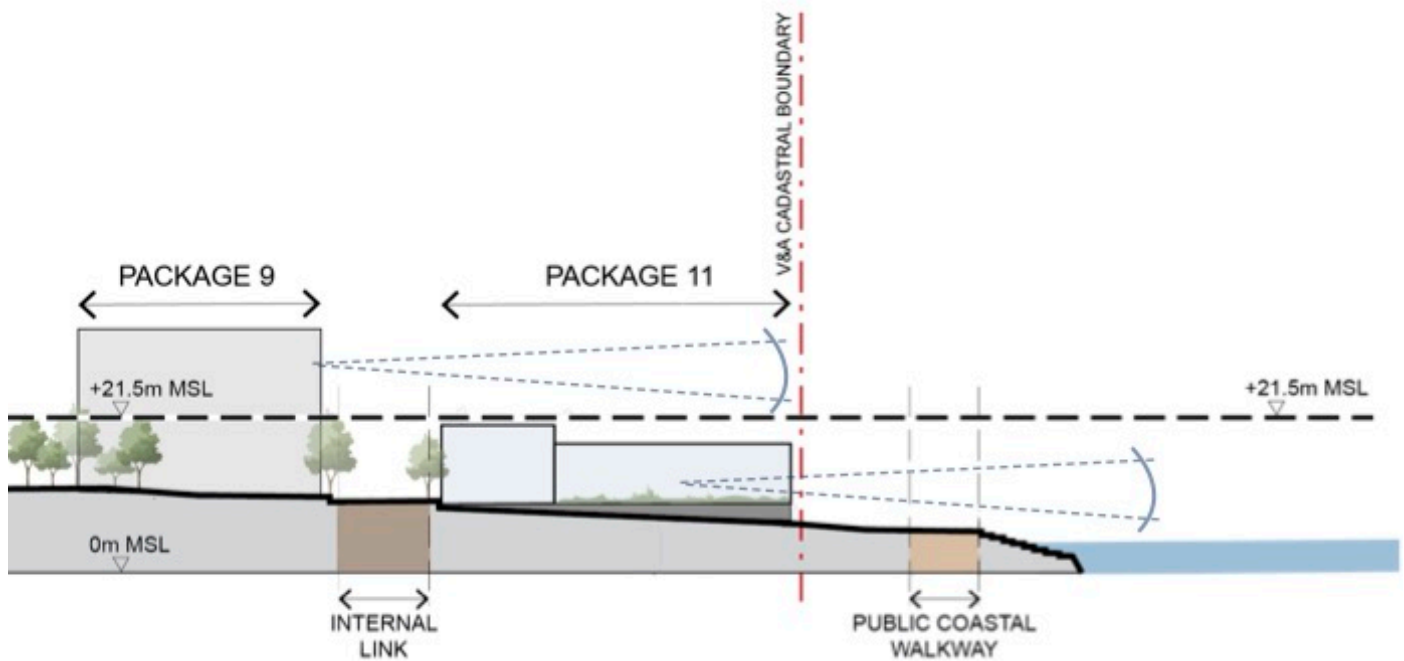


Figure 9 Section through Package 9 & 11 (not located within the Arc of Fire) at a lower height to not overshadow Package 11 which is located within the Arc of Fire (Source: V&A)

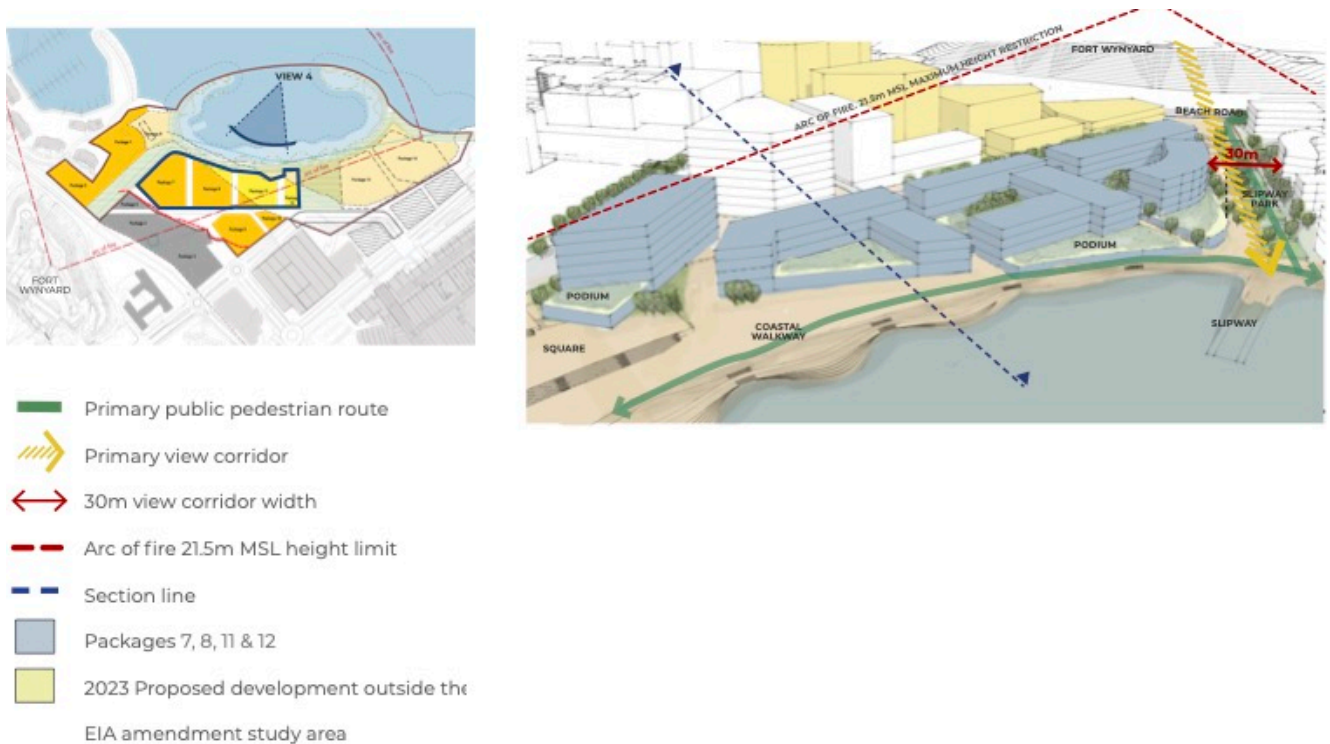


Figure 10 View 4 of Packages 7, 8, 11 and 12 (Source: V&A)

3.2.2.3 Package 9 and 10

- To support legibility and support a sense of enclosure, the height of buildings along Granger Bay Boulevard view corridor should be in proportion to the width of the boulevard
- Buildings are to cascade down toward the ocean to optimise views

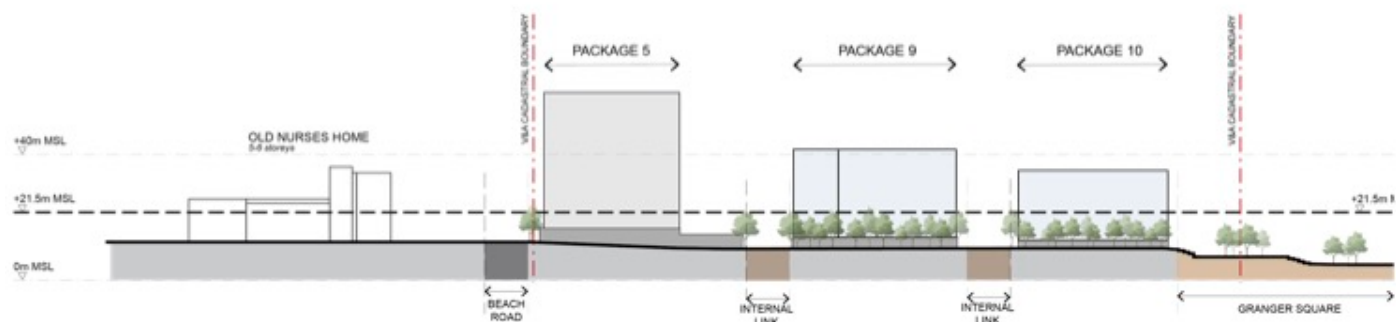


Figure 11 Section along Granger Bay Boulevard cascading of Building Heights towards the ocean (Source: V&A) (Package 5 is an unbuilt block with existing rights, outside the proposed development footprint)

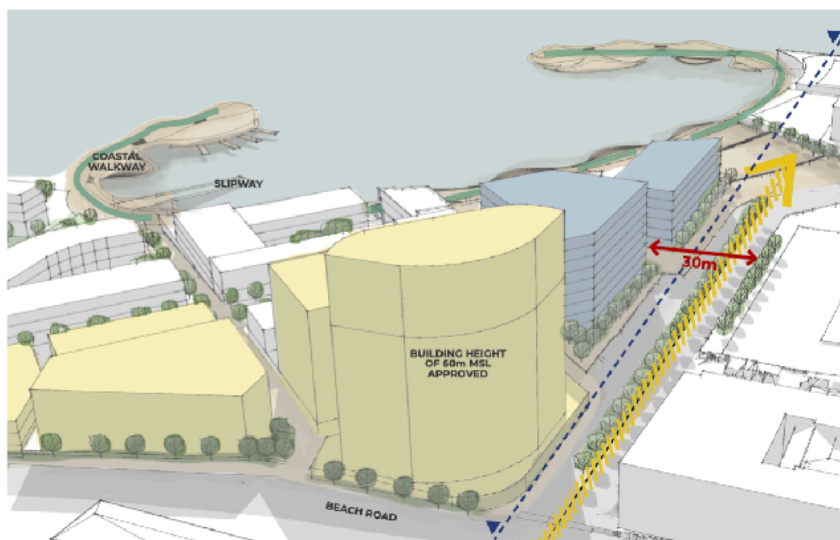


Figure 12 View 5 of Packages 9 and 10 (Source: V&A)

3.2.2.4 Package 13 and 14 (on reclaimed land)

- Building edges to be treated sensitively in relation to the public realm
- The portion of buildings located within the arc of fire to have a height limit of 21.5m MSL. The lower levels of buildings in this package should make use of podium architecture
- The height of the building portions located outside the arc of fire may be higher up to a maximum of 32m MSL
- The use of internal courtyards is encouraged to optimise solar gain onto building facades

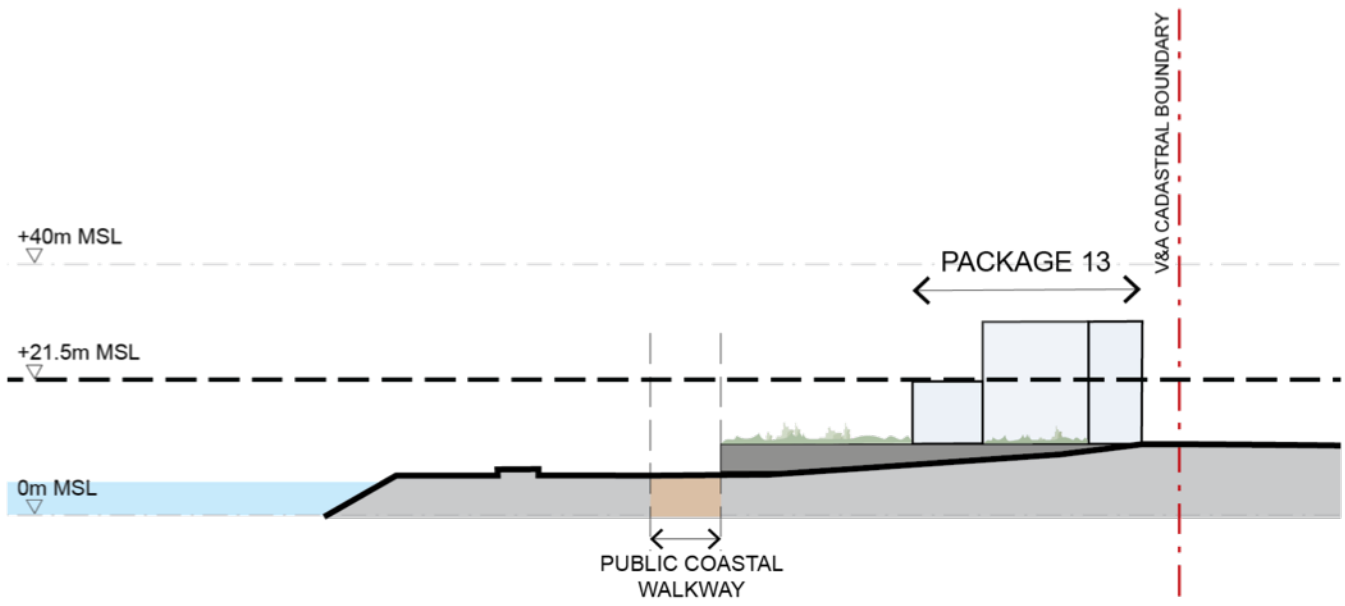


Figure 13 Section through the Public Square towards the ocean (Source: V&A)

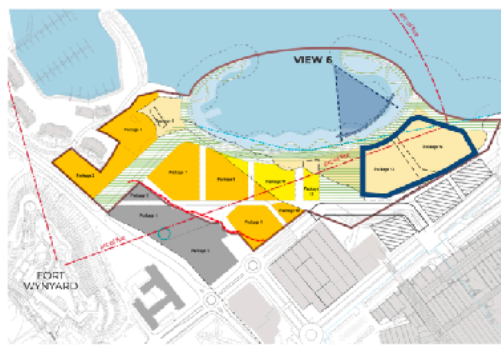


FIG 29 LOCALITY PLAN: VIEW 6 (PACKAGE 13 & 14)

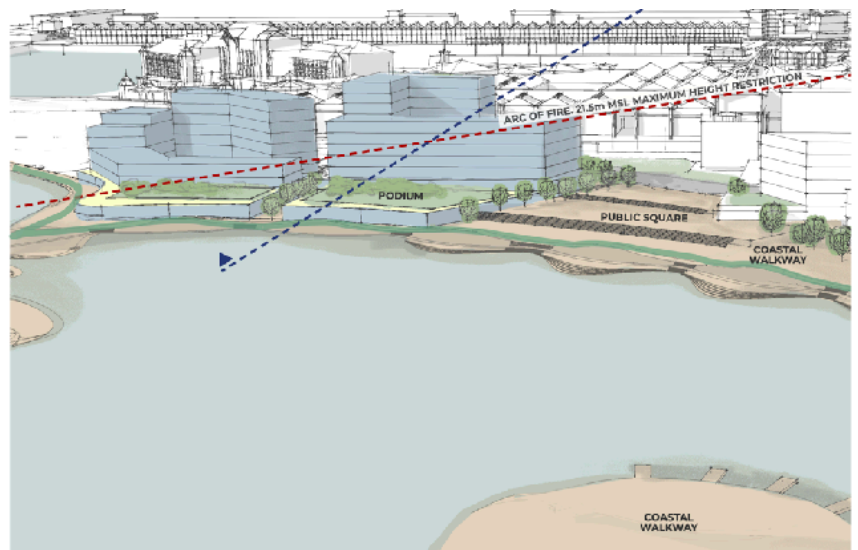


Figure 14 View 6 of Packages 13 and 14 (Source: V&A)

GENERIC GUIDELINES APPLICABLE TO ALL PACKAGES

HEIGHT

1. Packages located within the 'historic arc of fire' 21.5m height limit
2. The greatest height and massing within the Precinct shall be located towards the corner of Granger Bay Boulevard and Beach Road
3. The height of buildings to be scaled in relation to the scale of adjacent spaces with the taller buildings clustered at gateway locations and on the edges of the widest streets and large squares

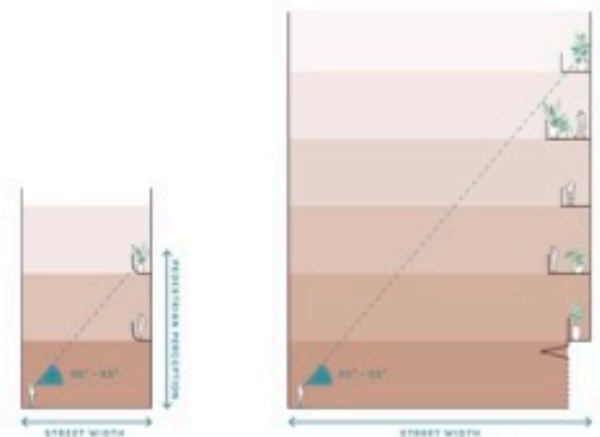


FIG 4 PEDESTRIAN PERCEPTION OF TALL BUILDINGS ON NARROW AND WIDE STREETS

SETBACKS AND INTERFACE CONDITIONS

4. Positive street interface conditions at ground level are to be used along key public streets and open spaces. These interface conditions consist of, but are not limited to; visually permeable frontages, sheltered edges and canopies.
5. Buildings above a height of 21.5m (MSL) or 4 storeys should be set back by approximately 2 metres where possible for purposes of enhancing the interface between the overall building and the street/ pedestrian level

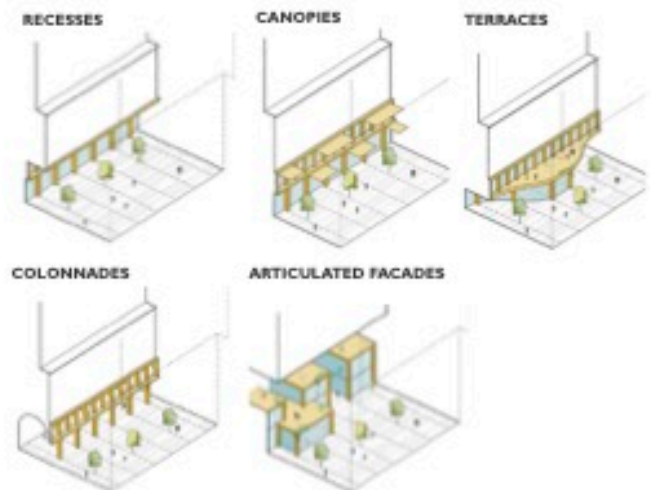


FIG 3 INDICATIVE INTERFACE CONDITIONS EDGING PEDESTRIAN ROUTES AND KEY PUBLIC SPACES

BUILT FORM

6. Buildings to cascade down towards the ocean, in order to create a) opportunities for views of the coast b) a positive interface with the public coastal walkway
7. The massing and form within a development parcel shall be articulated in order to reduce the overall scale of the buildings. This can be achieved by differentiating the upper level of a building from other levels by a set back and / or the use of transparent/ visually permeable materials.
8. The use of balconies, pergola's, screens and or roof over hangs should be promoted to articulate building facades



FIG 5 CASCADING BUILDING HEIGHTS TO OPTIMISE VIEWS OF THE WATER AND OF TABLE MOUNTAIN FROM THE WATER. BUILDINGS TO BE OF AN APPROPRIATE SCALE TO THE WIDTH OF THE STREETS ONTO WHICH THEY EDGE

Figure 15 Generic Guidelines Applicable to all packages



FIG 1 HERITAGE INDICATORS AND CONTROLS

- V&AW cadastral boundary
- EIA Application Site
- Existing buildings within the V&AW
- Approved development parcels
- Future development areas
- Indicative extent of future shore line
- Arc Of Fire. Set height limit
- Working Harbour edge
- Heritage structures
- View corridor clear from development

Figure 16 Heritage Indicators and controls (right) in the Granger Bay Phase 2 Precinct.

3.3 Public Open Space, Pedestrian Walkways and Roads/Streets

The coastal corridor will be extended to include the two breakwaters and the pedestrian walkway along the coast. The coastal corridor includes a 9m wide promenade as well as various coastal amenities such as tidal pools, steps to the water and a sheltered bay.

The 2025 proposed development provides for an integrated public space system of parks and open spaces. It includes a 9m wide public promenade along the coast, linking the existing promenade at Sea Point with the CBD.

In addition, it provides for direct access with the water, including the opportunity for tidal pools and concrete steps down to the water beyond the 9m. The breakwaters will provide sheltered waters for boating, kayaking, and swimming.

It will provide a different set of amenities including extended jogging tracks, tidal pools, boat launching sites, a fixed quayside, pedestrian pathways and open spaces/parks etc along the breakwaters which extend the length of access for the public with the water from 300m to 540m in length. Access for local fisherman remains unimpeded for launching their boats from a new slipway.

The 2025 scheme will integrate the reclaimed land into the design of the mixed-use development and the overall coastal and public experience. It exceeds the amenity value and extent of the previous application.



Figure 17 Illustrative plan view of the proposed Bay Area with coastal corridor, the Fort Wynyard 30m corridor and the Granger Bay Square

The Coastal Corridor/Sea Park will be linked to the Fort Wynyard 30m wide corridor in the west of the Precinct, which is a combined public space and street, and to Granger Square in the east,

3.4 Alternatives considered in the impact assessment

The Alternatives that will be compared are as follows:

- The No-Go Alternative;
- The current 2025 Proposal, which will be the Preferred Alternative (V&A)

The previously approved (2019) proposal (GAPP, September 2017) - VIA by Lawson and Oberholzer, 2017 will be discussed and compared for the HWC requirement, but does not form part of the EIA application

The 2019 Proposal is illustrated in the figure below.

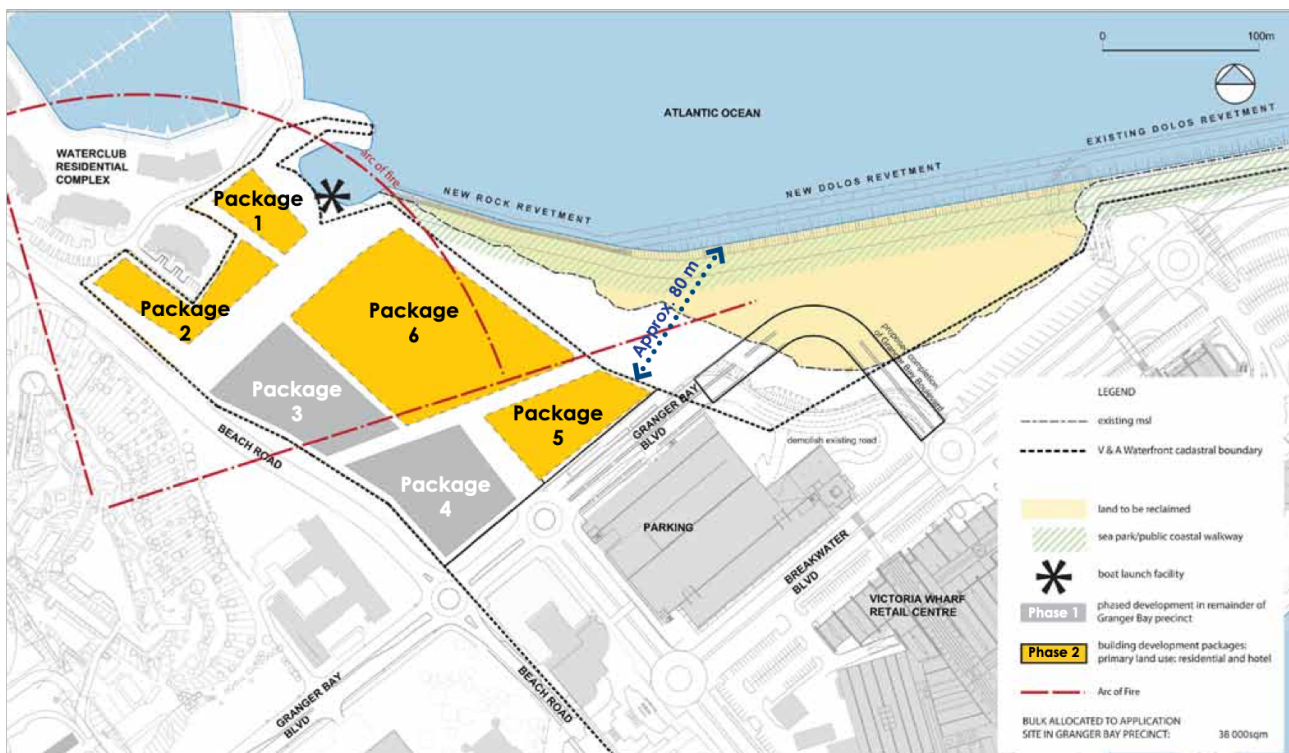


Figure 18 The Approved 2019 Granger Bay Precinct Plan

The approved 2019 development comprised two main components

- Mixed use (primarily residential with some retail and commercial use) development of Erf 173712 and portion of Erf149294 Cape Town (also referred to as the Granger Bay precinct, located in the V&A Waterfront); and
- Associated revetment and Land Reclamation.

Mixed Use Development

A portion of Granger Bay land (seaward of the 100m setback line from the High-Water Mark) was proposed for a coastal walkway, residential, retail and commercial development (or the Phase 2 development of Granger Bay).

Associated Revetment and Land Reclamation

As a replacement for the existing temporary rock revetment, a permanent 'dolos' revetment was to be constructed. The new dolos revetment would be an extension of the existing 'dolos' revetment which currently ends at the end of Breakwater Boulevard. The extension would be in a straight line for a length of approximately 310m in a westerly direction across Granger Bay. In

addition, the existing embankment that marks the coastal edge of the Granger Bay precinct was to be replaced with a rock revetment for a length of approximately 160m.

Due to the alignment of the revetment across Granger Bay an area of approximately 2.4 Ha was to be reclaimed. A new land parcel comprising the reclaimed land (2.4 Ha) and existing undeveloped land beyond the cadastral edge of the V&A (1.07 Ha), with a total area of approximately 3.4 Ha, would be created as a result of the reclamation.

A coastal “sea park” of up to 30m wide would provide continuous public access from Beach Road to and along the coast. Outdoor leisure and recreational facilities would be located along this route.

4 Identification of applicable Legislation, Policies, Standards and Guidelines

4.1 Legislation

- The National Environmental Management Act (NEMA), 107 of 1998
 - requires a full Scoping and Environmental Impact Assessment (EIA) process;
 - the EIA Regulations require Environmental Authorisation for new developments within 100m of the HWM.
- National Environmental Management: Integrated Coastal Management Act (ICMA):
 - ministerial pre-approval and parliamentary ratification required for the reclamation of land from the sea for private purposes;
 - the Act specifies coastal protection zones including land situated wholly or partly within 100m of the high water mark. The purpose of a coastal protection zone is, *inter alia*, 'to protect the ecological integrity, natural character and the economic, social and aesthetic value of coastal public property', (Section 17a). The term 'aesthetic' would include visual or scenic resources that need to be taken into account in the visual assessment.
- National Heritage Resources Act (NHRA), 25 of 1999
 - HWC require an HIA, Archaeological Impact Assessment (AIA) and Visual Impact Assessment (VIA) for this project and will be commenting on the reports;
 - the AIA also requiring comment from South African Heritages Resources Agency (SAHRA) as the national government is responsible for the management of the seabed below the mean high water mark and the management of maritime and underwater cultural heritage resources under the NHRA remains the responsibility of the national agency, SAHRA.

4.2 Heritage Precedent Context

The following precedents establish a framework for allowable development

- City of Cape Town Heritage Audit - The Draft Victoria & Alfred Waterfront Conservation Management Plan & Heritage Inventory of the Built Form (January 2024) (CMP) - primary heritage informant, still in HWC process, was not in place previously
- The City of Cape Town's heritage inventory grades
 - Oceana Powerboat Club and workshop (Grand Beach Cafe) - Grade 111C
 - Lower Portwood Road and Beach Road as IIIA (Entrance roads to the Old Table Bay (now V&A Waterfront). Significant historic routes and gateways into the precinct.").
 - the V&AW is a proposed HPOZ. Green Point Common, Fort Wynyard and Somerset Hospital are Provincial Heritage Sites.
- Table Bay District SDF 2023 - In terms of the Table Bay District SDF, Sub-district 2, the V&A is identified for 'potential mixed use'.
- V&AW precedent approvals (from Draft Heritage Impact Assessment, C Postlethwayt)
 - Beach Road Precinct Plan and Arc of Fire - Tribunal established the approved sight lines from Fort Wynyard related to the arc of fire. Within the view arc, no buildings will be higher than

21,5m or approximately 5 floors. Outside the view arc, towards the Beach Road/ Granger Bay Boulevard Ext. corner, building heights may be 10 or 16 floors.

- Granger Bay Precinct Plan 2014 & as amended 2019 - the Granger Bay Precinct Plan was approved in January 2014 by the CCT, amended in the 2019 approved Granger Bay land reclamation, now under review in this study. Two building parcels east of the 'arc of fire' were approved to heights of 50 - 60m (MSL)
- V&AW Mixed Use Rezoning HIA (2024) On the basis of the V&AW Urban Design Guidelines, HWC accepted the proposed indicative height and massing of development parcels specifically, as relevant to this application (refer to Figure 19 below):
 - Parcels 12 W, A, B, C, D and E as proposed with no further requirements in terms of the NHRA
 - Parcels 12 J, K, L, M and N; U1, U2, U3, U4, U5 & V with no further requirements in terms of the provisions of the NHRA, subject to maritime archaeological mitigation conditions

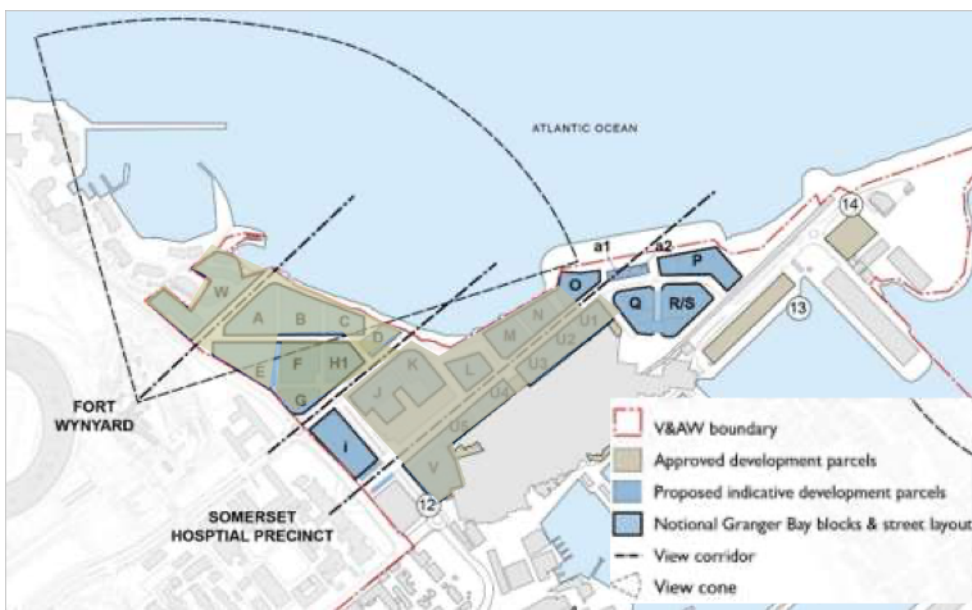


Figure 19 Development parcels, as relevant to this application 2024 HWC approved or no NHRA applications applicable

4.3 Guideline for Involving Visual and Aesthetic Specialists in EIA Processes

The Guideline, issued by the Provincial Government of the Western Cape, offers an approach for visual assessments. Granger Bay forms part of an area with scenic, tourism, cultural and historical significance, and the proposed project is a high-density mixed-use type development. The category for Granger Bay would therefore be a Level 4 visual assessment, based on the nature of the site and the scale of the development proposals. (A level 4 assessment is a full VIA with 3D modelling and visual simulations).

4.4 Scenic Drive Network Management Plan (2003)

This is a strategic framework designed to identify, conserve and manage routes with exceptional scenic quality. It aims to balance natural/built environment protection with tourism development by implementing specific, prioritised interventions for roads, reserves, and adjacent land, primarily focusing on managing the visual "envelope" of these scenic routes.

Scenic routes are categorised into two main types:

- SR1: Limited-access routes traversing areas of high scenic quality (e.g., Chapman's Peak Drive).

- SR2: Frequently accessed routes that traverse areas of high scenic quality, (e.g., Hout Bay Main Road).

This document classifies Beach Road in this area as a S2 road.



Figure 20 Portion of Cape Town’s Scenic Route network indicating the section of Beach Road which is adjacent to the proposed Phase 2 Granger Bay Precinct development

There are development packages adjacent to this section of Beach Road which have already been approved. These will result in loss of views of the coast and Table Bay.

5. Visual Framework Study

5.1 Description of the affected environment

5.1.2 Physical Landscape

The site is located on a coastal platform, part of which is already reclaimed land, the original coastline running roughly through the middle of the site and part of which is proposed to be reclaimed land.

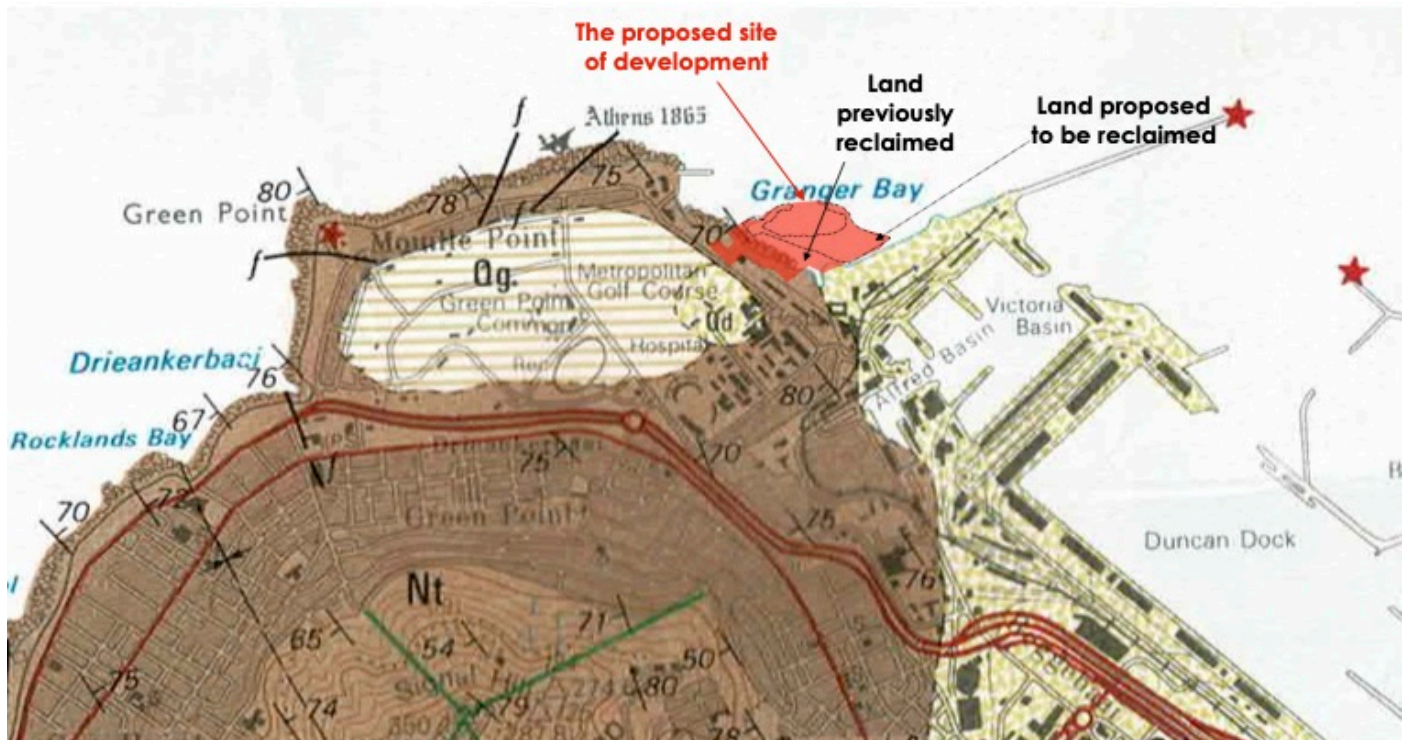


Figure 21 Proposed site of development overlaid on 1984 Geology map indicating the original coastline, land previously reclaimed and land proposed to be reclaimed (Source: 1:50 000 Geological Series 3318CD Cape Town)

The site is heavily disturbed and has no natural rock outcrops or other landscape features. The existing unprotected coastal embankment consists of untidy random fill material and is vulnerable to erosion by the sea.

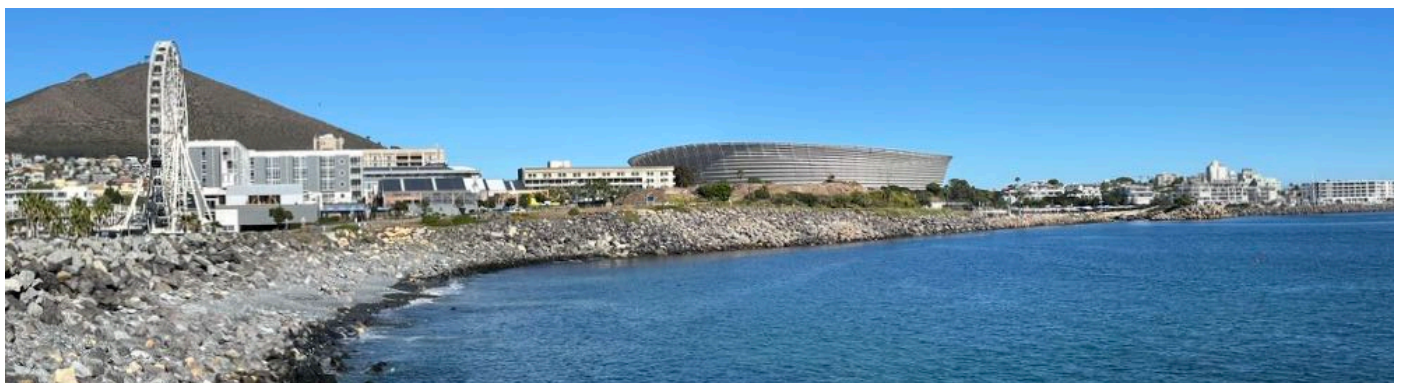


Figure 22 Existing coastal embankment comprised of untidy random fill

5.1.3 Existing land use

The site is mainly vacant and portions are leased by tenants, including the Oceana Power Boat Club, its boat launching facility which is protected by a breakwater and the boat garages and the Grand Beach Restaurant.



Figure 23 Oceana Power Boat Club and launching facility

A temporary Parking Building provides a couple of floors of undercover parking on the corner of Beach Road and Granger Bay Boulevard. A large portion of the central area of the site is being used to stockpile excavated material from construction in the V&A Waterfront.



Figure 24 Grand Beach Restaurant in centre of photo with tented structures, umbrellas and beach sand and excavated material stockpile and temporary garage immediately behind (note untidy random coastal protection measures along waters edge.)

Haul Road provides vehicular access to these facilities. A pedestrian walk and cycleway along Haul Road links Beach Road, in the west, to Granger Bay and Breakwater Boulevards in the east. Between the Grand Beach Restaurant and Breakwater Boulevard, this pathway is adjacent to the coastal embankment with uninterrupted views across Table Bay and some views of Signal Hill and Table Mountain. The road verges in this area have been landscaped continuing the landscape themes elsewhere in the V&A Waterfront.



Figure 25 Haul Road between Breakwater Boulevard and Beach Road with pedestrian and cycle path adjacent to the coastal embankment and with landscaped verges including street lighting, timber bollards and fencing and tree, shrub and groundcover planting (note excavated material stockpile to left of road)

5.1.4 Visual significance of the area

The visual significance of the site is provided by its coastal setting and being wedged between the V&A Waterfront, Fort Wynyard and The Water Club.

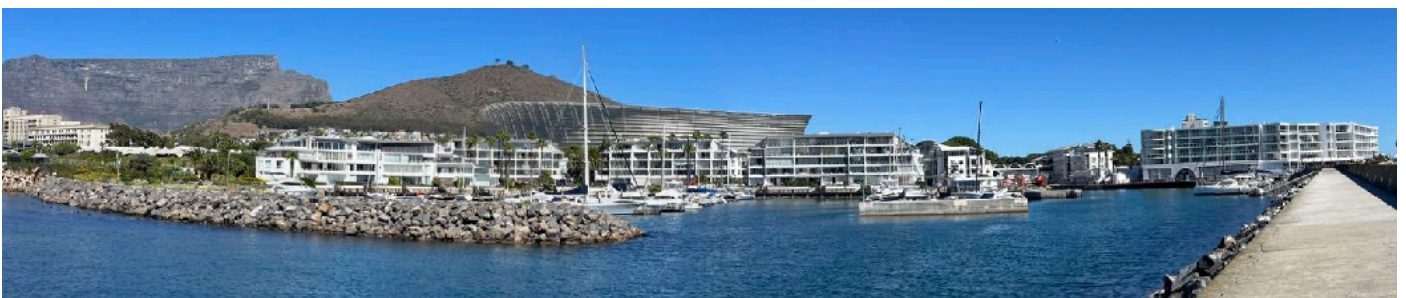


Figure 26 Neighbouring The Water Club and The Radisson Hotel to the west of the site



Figure 27 The Victoria Wharf shopping centre to left of photo and historic Somerset Hospital, yellow building at end of the Breakwater Boulevard (centre left of photo)



Figure 28 View from Fort Wynyard, across the Granger Bay site towards Table Bay and Blouberg

The important view cone from Fort Wynyard with its so-called 'arc of fire' across the site and Table Bay adds to the significance of the site. The historic Fort which is a Provincial Heritage Site (PHS) forms part of an old sequence of military sites, with views to Signal Hill, Robben Island and Blouberg, all of which formed part of the defence of Table Bay. The old Somerset Hospital and its forecourt to the southeast of the site is a Provincial Heritage Site.

Beach Road, which runs along the southern boundary of the site, is a S2 Scenic Road between Sea Point and the V&AW (Scenic Drive Network Management Plan 2003). This road is used by tourists and commuters who get glimpses of the coast and Table Bay down the Haul Road and Granger Bay Boulevard corridors. Topography, vegetation and buildings in between these two corridors obstruct further views.

5.1.5 Visual Characteristics and Sense of Place

The surroundings built environment is *'an incongruous mixture of uses – the historic Somerset Hospital building alongside the unsympathetic newer hospital buildings, the old Fort partly buried in an earth mound starkly contrasted by the massive scale of the new soccer stadium, and the Green Point Park contrasted with the bustling more intimate spaces of the V&A Waterfront.'*

A number of properties in the surrounding area have approval for re-development to higher buildings than at present with one currently under construction adjacent to the Cape Town Stadium and Fort Wynyard.

The largely vacant and derelict Granger Bay site lacks identity at present, contributing little to the local environment or public amenity

The Scenic resources of the site can be described as predominantly vacant and derelict and are moderately rated, based on coastal setting and other visually significant aspects.

5.2 Viewshed and Zone of Visual Influence (ZVI)

5.2.1 Viewshed

The geographical area from which the project will theoretically be visible, or view catchment area, is dictated primarily by topography.

- High visibility – visible from a large area (e.g. several square kilometres).
- Moderate visibility – visible from an intermediate area (e.g. several hectares).
- Low visibility – visible from a small area around the project site.

The viewshed of the proposed development, when defined by topography, will extend to the ridgelines and upper areas of Signal Hill (1,5kms away), Table Mountain (5kms away) and Devils Peak (6kms away).

From a distance of 5kms, the proposed development will be visible but will merge with the surrounds.

The viewshed to the north extends to Robben Island and Tygerberg Hills but distance reduces the actual zone of visual influence of the proposed development to the closer Table Bay areas.



Figure 29 Viewshed of the proposed Granger Bay Precinct Development, dictated primarily by topography

5.2.2 Zone of Visual Influence

Local features such as development will reduce the extent of the area from which the proposed Granger Bay Precinct site and development will be seen, to an area known as the Zone of Visual Influence (ZVI) of the site.

The areas between the site and the landforms above are generally screened by existing developments such as the Cape Town Stadium (200m) in the south west, Fort Wynyard, the more modern buildings of Somerset Hospital in the south (50m) and the adjacent V&A buildings in the east (25m - 100m).

The proposed development will be clearly seen by neighbouring developments and public areas within 500m of the site.



Figure 30 ZVI of the proposed Granger Bay Precinct Development, dictated by development

The visibility will be moderate from the south and high from the north, ie visible from an intermediate area to visible from a large area.

5.3 Receptors

The level of visual impact considered acceptable is dependent on the type of receptors.

- High sensitivity – e.g. residential areas, nature reserves and scenic routes or trails;
- Moderate sensitivity – e.g. sporting or recreational areas, or places of work;
- Low sensitivity – e.g. industrial, mining or degraded areas.

The highly sensitive receptors will include the residential areas namely The Water Club and the Radisson Hotel as well as the Beach Road which is a scenic route.

The moderately sensitive receptors will be the sporting or recreational areas (Cape Town Stadium and adjacent facilities, Metropolitan Golf Club, Greenpoint Park), places of work (offices along Breakwater Boulevard and Portswood Road, Somerset Hospital, Victoria Wharf Shopping Centre and The Bay Hotel).

While the proposed development type is of a similar nature to the receptors, the impact on most of the receptors will be moderated. The visual impact on the Dover Apartment block in The Water Club will be high.

Visual sensitivity of receptors is moderate to high



Figure 31 Receptors of the proposed development

5.4 Visual Exposure

This is based on distance from the project to selected viewpoints. Exposure or visual impact tends to diminish exponentially with distance.

- High exposure – dominant or clearly noticeable;
- Moderate exposure – recognisable to the viewer;
- Low exposure – not particularly noticeable to the viewer;

The proposed development will be clearly noticeable from the immediate neighbours, namely the Water Club, Radisson Hotel and adjacent V&AW buildings, Fort Wynyard and the Somerset Hospital buildings. It will also be clearly visible from the adjacent coastal area and Table Bay area. These areas/buildings will experience High exposure.

Moderate exposure will be experienced by the residential areas on the lower slopes of Signal Hill where the proposed development will be recognisable to the viewer.

Low exposure will be experienced by users of the upper slopes and crest of Table Mountain facilities (eg. hikers, tourist)

Visual exposure will vary between high and low, ie being clearly noticeable, recognisable to not particularly noticeable.

5.5 Visual sensitivity of the area

The inherent visibility of the landscape, usually determined by a combination of topography, landform, vegetation cover and settlement pattern, translates into visual sensitivity.

- High visual sensitivity – highly visible and potentially sensitive areas in the landscape.
- Moderate visual sensitivity – moderately visible areas in the landscape.
- Low visual sensitivity – minimally visible areas in the landscape.

At the Granger Bay Precinct site, the topography and landform of the proposed site of development is a low lying (<5m) coastal platform, both being minimally visible areas in the landscape. However the coastal edge, heritage resources (Signal Hill, Fort Wynyard and Somerset Hospital), Scenic Routes (Beach Road) and tourist destinations (V&A Waterfront) increases the visual sensitivity of the site to high visual sensitivity,

The site has a high visual sensitivity i.e. it is a highly visible and potentially sensitive area in the landscape as a result of heritage and visual resources.

5.6 Visual Absorption Capacity

Visual Absorption Capacity is the potential of the landscape to conceal the proposed project

- *High VAC* – e.g. effective screening by topography and vegetation;
- *Moderate VAC* - e.g. partial screening by topography and vegetation;
- *Low VAC* - e.g. little screening by topography or vegetation.

Being on the coastal edge, coastal platform and reclaimed land, the landscape is gently sloping to flat and there is little to no screening potential offered by either the topography or vegetation. From the north and Table Bay, the VAC is low. The proposed project will not be concealed.

Similarly the proposed residential development adjacent to The Water Club, particularly Packages 1 and 2, will not be screened from the most eastern block in The Water Club, the VAC here is low.

The proposed development will also not be screened from Beach Road.

The previously approved (Ph1) buildings between Beach Road and the site, and between Granger Bay and Breakwater Boulevards, will provide effective screening for the most part from the landward, southern side.

The VAC to conceal the project from Table Bay, the eastern most block of The Water Club and Beach Road is low.

5.7 Visual Intrusion

Visual Intrusion is defined as the level of compatibility or congruence of the project with the particular qualities of the area, or its 'sense of place'. This is related to the idea of context and maintaining the integrity of the landscape or townscape.

- *High visual intrusion* – results in a noticeable change or is discordant with the surroundings;
- *Moderate visual intrusion* – partially fits into the surroundings, but clearly noticeable;
- *Low visual intrusion* – minimal change or blends in well with the surroundings.

The proposed revetments and mixed development is generally compatible with the surroundings, i.e. the scale, urban form and nature of activities.

The proposed Granger Bay development will have a moderate visual intrusion - it will partially fit into the surroundings but be clearly noticeable.

The following Tables rates the intensity of the alternative proposals

| Criteria | Comments regarding 2025 Proposal | No-Go | 2019 Proposal | 2025 Proposal |
|---|--|--------|---------------|---------------|
| Visibility of the project/facilities | The visibility will be Moderate from the south and High from the north, ie visible from an intermediate area to visible from a greater area. | Medium | Medium - High | Medium - High |
| Visibility of lights | Depends on lights from buildings, floodlighting, security lighting and street or area lighting. Information on lighting is not available, so that a worst-case scenario is assumed. | N/A | High | High |
| Visual Exposure | Visual exposure will vary between High and Low, ie being clearly noticeable, recognisable to not particularly noticeable | Low | Medium - High | Medium - High |
| Visual sensitivity of the area | | Medium | High | High |
| Landscape Integrity - effect on character of area | The taller buildings have been restricted to the Granger Bay Boulevard, with other buildings being lower and bulk being reduced by wider podiums and internal courtyards, and buildings stepping down to the coast | Medium | Medium - High | Medium - High |
| Visual Absorption Capacity | The VAC is low from the north but high from the south, east and west | Low | Medium - High | Medium - High |

| Criteria | Comments regarding 2025 Proposal | No-Go | 2019 Proposal | 2025 Proposal |
|--------------------------|----------------------------------|------------------------|------------------------------|------------------------------|
| Overall Impact intensity | | Range is Low to medium | Range is Medium high to high | Range is Medium high to high |

6. Potential Visual Impacts

Current requirements of the NEMA EIA Regulations require that potential impacts during all phases of the project, (construction, operation and decommissioning phases) are to be identified and assessed. Similarly the Cumulative impacts are to be assessed.

The potential visual impacts would occur during the construction and operation phase of the development. The nature of the visual impacts will be the visual effect the activity would have on the receiving environment. These potential impacts are discussed below.

The visual impact has been assessed as per the DEAT Guideline 5: Assessment of Alternatives and Impacts.

As per HWC's requirement for the current proposal to be compared to the approved scheme, we include the assessment of the approved scheme in the table below.

6.1 Potential visual impacts of construction activities

The construction of the proposed coastal revetments, coastal infilling to reclaim land, construction of large buildings and roads will require the use of cranes, earth-moving, demolition and construction machinery. These activities will have visual, noise and dust effects during the construction period, which could continue for decades as the site is extensive, but the programme and duration is unknown. It will negatively affect the surrounding residents and workers, as well as marine life during land reclamation.

| Criteria | Scoring | No -Go Alternative | Proposed 2019 mixed-use development | Proposed 2025 mixed-use development |
|---|--|-------------------------------|--|--|
| Impact | Potential Impacts of Construction Activities | | | |
| Extent Degree of influence over a geographic area. | Site Specific; Local (<2km); Regional (within 30km); National; International. | No construction, no impact | Local | Local |
| Intensity Magnitude or size of the impact | High (severe alteration); Medium (notable alteration); Low (Negligible alteration) | No construction, no impact | Medium - High | Medium - High |
| Duration Time-frame impact will be experienced. | Temporary (<1year); Short term (1-6 years); Medium term (6-15 years); Long term (cease after operational life); Permanent; | No construction, no impact | Medium term | Medium term |
| Reversibility Extent to which impact is reversible at decommissioning | High reversibility; Moderate; Low; Non reversible (permanent) | No construction, no impact | High - impact ceases on completion of construction | High - impact ceases on completion of construction |
| Irreplaceability of Resource Loss | High; Moderate; Low; Replaceable | No construction, no impact | Moderate | Moderate |
| Probability | Probable (<50%) Highly probable (50% - 90%) Definite (>90%) | No construction, no impact | Definite | Definite |
| Significance before mitigation | Low - very low; Medium; High; | No construction, no impact | Medium - High | Medium - High |
| Status | Positive Negative Neutral | No construction, no impact | Negative | Negative |
| Confidence | Low Medium High | High | High | High |
| Significance after mitigation | | No construction, no impact | Medium | Medium |

6.2 During the Operation Phase

6.2.1 Change in visual character and impact on scenic resources

The character, scenic resources and sense of place of the site will change from a mostly vacant and derelict area, albeit it adjacent to the shoreline, to a high density development with tall buildings. There is provision for positive street level interface conditions along public realms.

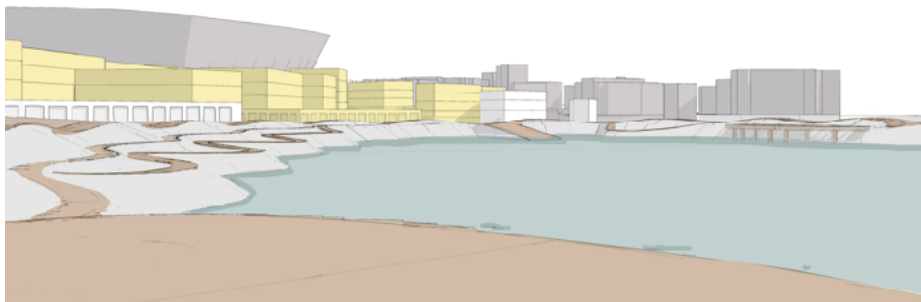
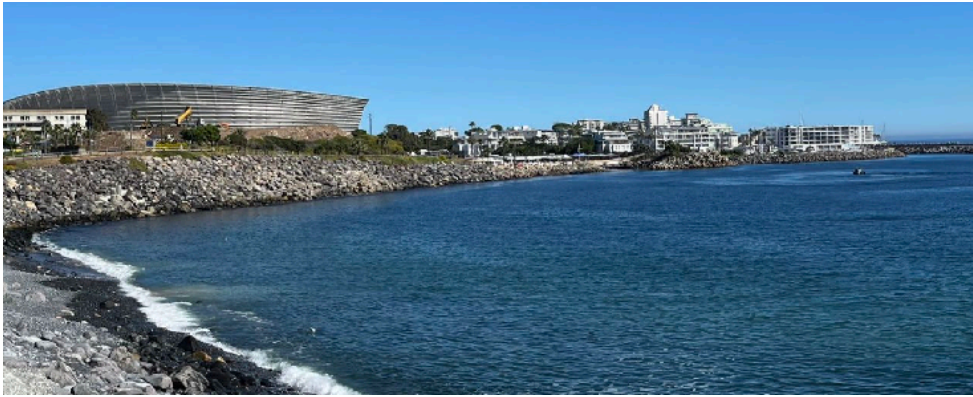


Figure 32 Looking west to the existing Cape Town Stadium, Water Club and Radisson Hotel buildings in grey, proposed buildings in yellow.

Provision for public access to and along the coast has been provided. The public pedestrian boulevard between Beach Road and the coastal walkway, the coastal walkway with access to the water and to the V&A Waterfront, the buildings adjacent to the coastal walkway set on podiums with active street interface and the public open space at the northern end of Granger Bay Boulevard, are positive public spaces. So too is the proposed new bay created by new rock revetments, which increase public coastal recreation amenities and views of Table Mountain and Signal Hill.

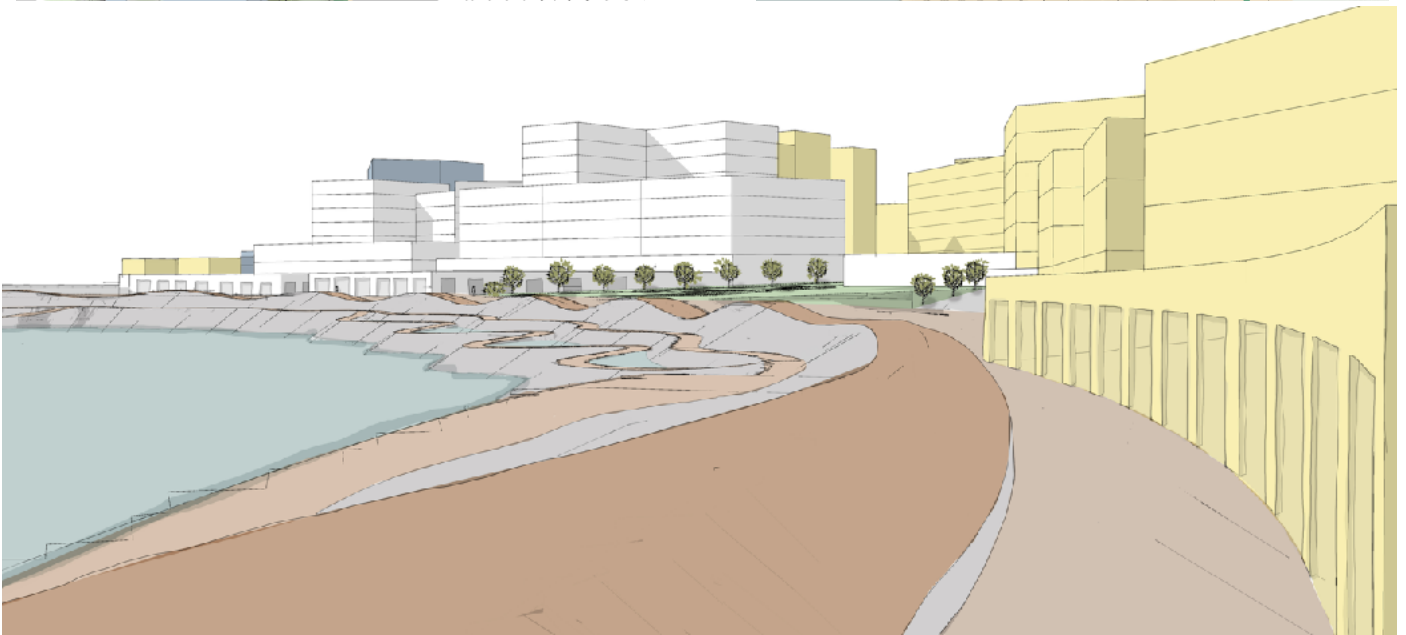
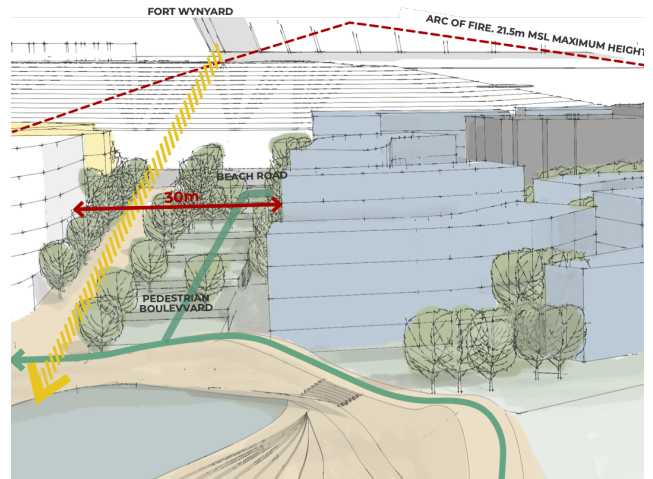
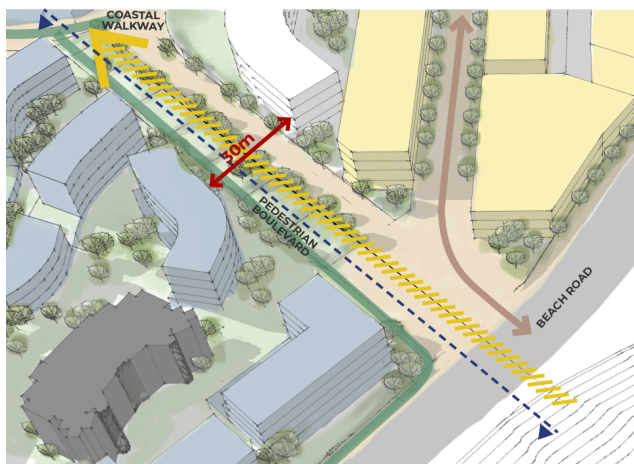


Figure 33 The pedestrian boulevard linking Beach Road to the slipway and coastal walkway (top) and the coastal walkway adjacent to building podiums, with interactive street interface, landscaped waterside and access to the V&A and public open space at Granger Bay Boulevard, are positive public places

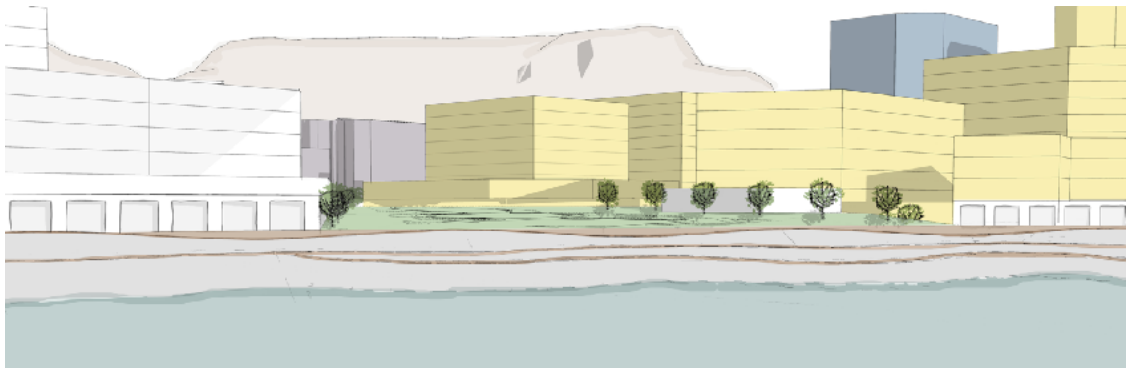


Figure 34 Proposed revetments provide for views south to Table Mountain which would probably be obstructed by proposed buildings along most of the coastal walkway.

The greatest building height and massing is located towards the corner of Granger Bay Boulevard and Beach Road in the south east with taller buildings clustered at gateway locations. This is in keeping with other approved buildings in those areas. Buildings will cascade down towards the ocean and positive street interfaces and setbacks for taller buildings are proposed along key public streets and open spaces.

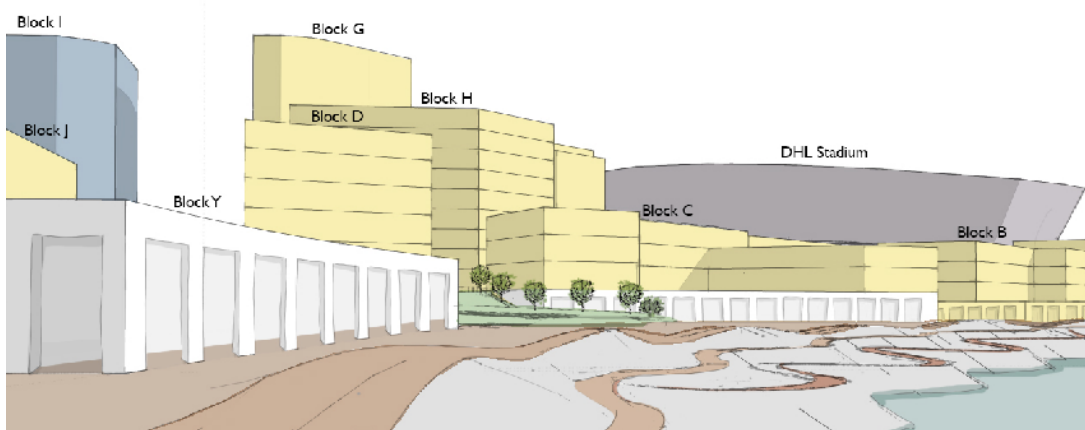


Figure 35 Taller buildings located on the corner of Beach Road and Granger Bay Boulevard

The required building height within the Fort Wynyard 'Arc of Fire' is met as is the 30m wide corridor to Table Bay.



Figure 36 Proposed buildings within Fort Wynyard 'Arc of Fire' meet the height restriction required

The proposed residential and retail uses of the buildings are compatible with the adjacent areas e.g. retail adjacent to the V&A Waterfront and residential adjacent to The Water Club. Overall, the proposed development has the capability of enhancing the scenic resources and character of the site and surrounds, but the level of detail building design is required to confirm this.

| Criteria | Scoring | No -Go Alternative | Proposed 2019 mixed-use development | Proposed 2025 mixed-use development |
|---|---|--|-------------------------------------|-------------------------------------|
| Impact | Change in visual character and impact on scenic resources as a result of development, with no development resulting in area being used for temporary activities including material stockpiling | | | |
| Extent Degree of influence over a geographic area. | Site Specific; Local (<2km); Regional (within 30km); National; International. | Local - temporary activities and derelict site | Local - Regional From within ZVI | Local - Regional From within ZVI |
| Intensity Magnitude or size of the impact | High (severe alteration); Medium (notable alteration); Low (Negligible alteration) | Medium - notable alterations | Medium - High | Medium - High |
| Duration Time-frame impact will be experienced. | Temporary (<1year); Short term (1-6 years); Medium term (6-15 years); Long term (cease after operational life); Permanent; | Medium - Longterm | Permanent | Permanent |
| Reversibility Extent to which impact is reversible at decommissioning | High reversibility; Moderate; Low; Non reversible (permanent) | Moderate | Non reversible | Non reversible |
| Irreplaceability of Resource Loss | High; Moderate; Low; Replaceable | Low | Moderate | Moderate |
| Probability | Probable (<50%) Highly probable (50% - 90%) Definite (>90%) | Highly probable | Definite | Definite |
| Significance before mitigation | Low - very low; Medium; High; | Medium | Medium - High | Medium - High |
| Status | Positive Negative Neutral | Negative | Negative | Negative |
| Confidence | Low Medium High | High | High | High |
| Significance after mitigation | | Medium | Medium | Medium |

6.2.2 Visual intrusion on Sense of Place (and views)

The proposed development of residential buildings in Packages 1 and 2, immediately adjacent to The Water Club, will be close to the Dover building. The proposed buildings have been articulated so as to allow for views past and over. They are lower in height when to the north of Dover and narrower in width to allow for some views. The upper floor Dover apartments will have views over the new proposed buildings and some of the lower floors should have views between buildings. The placement of the northern most building in Package 6 may need to be refined so as not to obscure these carefully curated views. The Dover apartments also have views to the east, north east and south east. Space has been left between the proposed buildings in these packages such that there may be some unobstructed views and some partially obstructed views. The figure below indicates the proposed arrangement of buildings and heights in relation to The Water Club buildings.

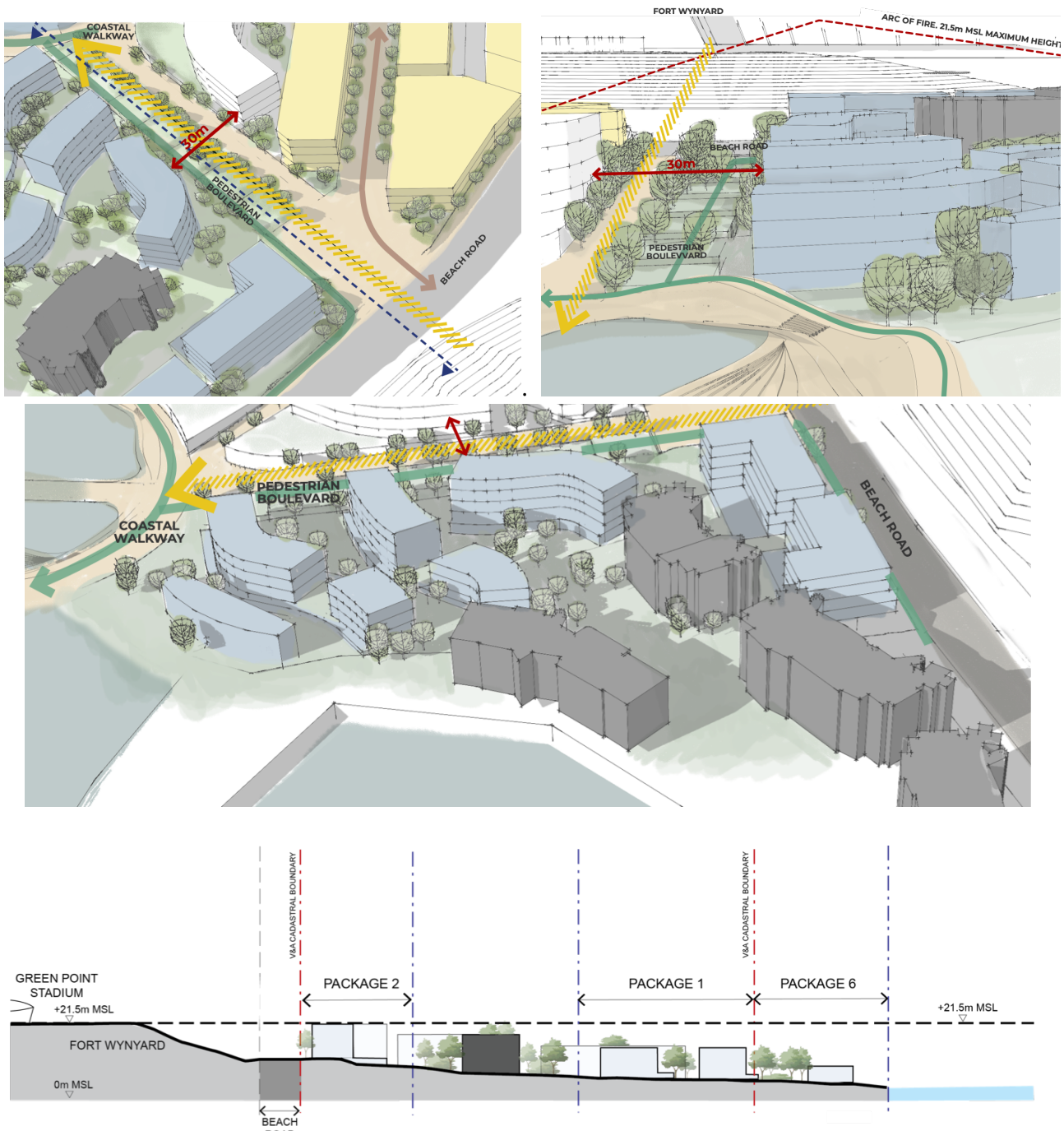


Figure 37 Proposed buildings in Packages 1, 2 and 6 showing relative heights and approximate widths.



Figure 38 Views from Dover apartments, top are from apartments on upper floors with bottom photos from apartments on first floor, left, and ground floor, right.

| Criteria | Scoring | No -Go Alternative | Proposed 2019 mixed-use development | Proposed 2025 mixed-use development |
|---|--|---------------------------|-------------------------------------|-------------------------------------|
| Impact | Visual Intrusion on Sense Place | | | |
| Extent Degree of influence over a geographic area. | Site Specific; Local (<2km); Regional (within 30km); National; International. | Local | Local | Local |
| Intensity Magnitude or size of the impact | High (severe alteration); Medium (notable alteration); Low (Negligible alteration) | Low | High | Medium - High |
| Duration Time-frame impact will be experienced. | Temporary (<1year); Short term (1-6 years); Medium term (6-15 years); Long term (cease after operational life); Permanent; | No development, no impact | Permanent | Permanent |
| Reversibility Extent to which impact is reversible at decommissioning | High reversibility; Moderate; Low; Non reversible (permanent) | No development, no impact | Non reversible | Non reversible |

| Criteria | Scoring | No -Go Alternative | Proposed 2019 mixed-use development | Proposed 2025 mixed-use development |
|--|---|---------------------------|-------------------------------------|-------------------------------------|
| Irreplaceability of Resource Loss | High; Moderate; Low; Replaceable | No development, no impact | High | High |
| Probability | Probable (<50%) Highly probable (50% - 90%) Definite (>90%) | No development, no impact | Definite | Definite |
| Significance before mitigation | Low - very low; Medium; High; | Low | High | Medium - High |
| Status | Positive Negative Neutral | NA | Negative | Negative |
| Confidence | Low Medium High | High | *Medium | *Medium |
| Significance after mitigation | | Low | Medium - High | Medium |

** Note: Confidence was considered to be 'medium' because of the absence of detailed information concerning the site layout and architectural treatment of buildings

6.2.3 Potential effect of lighting related to sense of place

There would be an increase in the amount of lights in the area generated by the lighting of new buildings, streets and outdoor spaces. This will result in additional light pollution.

| Criteria | Scoring | No -Go Alternative | Proposed 2019 mixed-use development | Proposed 2025 mixed-use development |
|---|---|--------------------|-------------------------------------|-------------------------------------|
| Impact | Light Pollution | | | |
| Extent Degree of influence over a geographic area. | Site Specific; Local (<2km); Regional (within 30km); National; International. | Local | Local - Regional | Local - Regional |
| Intensity Magnitude or size of the impact | High (severe alteration); Medium (notable alteration); Low (Negligible alteration) | Low | Medium - High | Medium - High |
| Duration Time-frame impact will be experienced. | Temporary (<1 year); Short term (1-6 years); Medium term (6-15 years); Long term (cease after operational life); Permanent; | NA | Permanent | Permanent |
| Reversibility Extent to which impact is reversible at decommissioning | High reversibility; Moderate; Low; Non reversible (permanent) | High | Low | Low |
| Irreplaceability of Resource Loss | High; Moderate; Low; Replaceable | Replaceable | Moderate - Low | Moderate - Low |
| Probability | Probable (<50%) Highly probable (50% - 90%) Definite (>90%) | Probable | Definite | Definite |
| Significance before mitigation | Low - very low; Medium; High; | Low | Medium | Medium |
| Status | Positive Negative Neutral | Negative | Negative | Negative |
| Confidence | Low Medium High | High | Medium | Medium |
| Significance after mitigation | | Low | Low | Low |

6.3 Cumulative Impacts

The cumulative impacts of the proposed development, together with the approved development, proposed developments along Breakwater Boulevard in the V&A and at the Somerset Hospital will be additive in nature and high in significance.

7 Mitigation Measures

7.1 Interface between The Water Club and Packages 1 and 2

The proposed buildings in Packages 1 and 2, situated north and north east of the The Water Club's Dover Apartment building, should be articulated such that they allow views towards Table Bay and Table Mountain.

7.2 Table Bay Views down Granger Bay Boulevard to be retained.

The podiums of the building Blocks Y and Z in Packages 13 and 14 should be such that they allow views of Table Bay from Granger Bay Boulevard from where it intersects with Beach Road and northwards. The podiums of Blocks Y and Z will be on reclaimed land, which is currently the coastal view that Granger Bay Boulevard frames. Development here, without appropriate planning for a view corridor/ road within these packages 13 and 14, will result in the loss of the Table Bay view currently visible in the image below. The final level of the breakwater is yet to be determined and may obscure this view to some extent.



Figure 39 -Existing view of Table Bay down Granger Bay Boulevard must be retained when buildings in packages 13 and 14 are developed.

7.3 Roads, Parking and Services

The visual intrusion of vehicular roads and parking areas between buildings must be minimised. Garages on the ground floor, which create 'dead' building frontages, are to be avoided.

Light pollution from outdoor or security lighting must be avoided, and high mast lighting prohibited. Street lights must be fitted with reflectors to avoid light spillage, and low-level lights provided for pedestrian areas. The building plan approvals must be subject to an approved lighting plan by a professional lighting engineer.

7.4 Landscaping

The Guidelines for Landscaping provided in the V&A Urban Design Guideline Document must be followed.

The Development Control Document addresses human-scaled outdoor spaces and routes, with climatic wind shelter and shade, and opportunities for sitting, particularly along the proposed coastal promenade. These must be implemented via an approved landscape plan as part of the SDP approval for these parcels.

Similarly, figures indicate the special treatment of the proposed coastal protection works to ameliorate the visual effect of engineered structures, which can appear visually severe. The engineered straight lines are replaced by way of curved edges, vertical and horizontal undulations, pathways at various levels, landscaping and access to the waters edge with a variety of water activities. These concepts must be implemented.

The design must be subject to an approved landscape plan prepared by a professionally registered landscape architect, as part of the SDP submission stage.

Street furniture, lighting and signage must be designed as part of an integral system and avoid unnecessary visual clutter in the coastal landscape setting.

Rock revetments are visually preferable to 'dolos'. This should be used on visible revetment areas



Figure 40 Preferred revetment using large rocks rather than dolos

7.5 Building Forms and Finishes

As no detailed indication of building forms and finishes was available at this stage of the EIA process, the design of these must be subject to approved architectural guidelines and will be incorporated in SDP's submitted to CoCT.

7.6 Construction Phase

An environmental management plan (EMP) with specifications, as well as an environmental control officer (ECO) must be put in place to ensure that visual pollution (including litter), noise and dust are minimised during the construction phase, with appropriate penalties for non-compliance.

7.7 Monitoring

A broad range of mitigation measures dealing with visual and aesthetic issues have been recommended above. Given the current lack of detailed architectural and landscaping information relating to the proposed project, it is essential that further visual reviews of the proposals take place at the Site Development Plan stages. These plans must give an indication of architectural and landscape proposals for the development.

8 Conclusion and Recommendations

The proposed Granger Bay Precinct development has a greater footprint than the previously approved 2019 scheme, making use of more reclaimed land in the east.

The 2025 scheme proposes a western and eastern revetment into the sea creating a partially enclosed bay with water and land based recreation facilities.

The proposed buildings are generally lower, with the higher buildings adjacent to Granger Bay Boulevard where they are in scale to the width of the road. Buildings cascade in height towards Table Bay. More open space is provided on building podiums and in internal courtyards. Heights adjacent to the coastal walkway are lower and have a positive street interface at ground level, in the form of active street interfaces, visually permeable frontages and sheltered edges.

The building height restriction in the 'Arc of Fire' from Fort Wynyard is adhered to and a 30m wide corridor in front of Fort Wynyard down to the sea and Table Bay is provided for. Similarly, the Granger Bay Boulevard has a 30m wide corridor.

Public access to the coastal edge and facilities is provided with a generous walkway continuing from Beach Road in the west all along the coastal edge to the Table Bay Hotel in the east. Access for the public and fisherman to launch boats from a new slipway is unimpeded.

The visual impacts as a result of the 2025 scheme include:

- Visual impacts during construction
- Change in Visual Character and Scenic Resources
- Intrusion on Sense of Place;
- Intrusion of lighting at night;

Mitigation is possible to a degree through the details of the building which are not available at this time. However, the scale and mass of buildings, while being similar in nature and use to the existing, will be clearly noticeable.

The 2025 impact significance is rated medium - high before mitigation and medium after mitigation.

While the footprint of the 2025 proposed development is greater, the visual aspects are mitigated by lower buildings, courtyards, cascading heights down to coast, response to neighbours, wider podiums resulting in reduced building scale along the coastal corridor and public squares and therefore preferred from a visual perspective.

A number of mitigation measures have been implemented since the 2019 scheme and are part of the Granger Bay Development Controls. New mitigation measures are required for the buildings extending onto the reclaimed land at the northern extent of Granger Bay Boulevard and in Package 6 to the north of The Water Club's Dover Apartments. In both instances, the mitigation required is in order to allow views of Table Bay.

More detail would be required to achieve a more accurate assessment. It should be noted that in the land use rezoning approval for the V&A (January 2026) , condition of approval for development in Granger Bay is that a Precinct Plan shall include the following information: Condition 3.7.13 states : "A Visual Impact Assessment prepared by a suitably qualified specialist".

For HWC VIA requirement, the proposed development was compared to the previously approved development and it was found that while the development footprint was greater, the height of buildings was generally lower and the previously proposed visual mitigation measures had all been incorporated into the Development Controls and Urban Design Guidelines.

It is also noted that the 2024 HWC approval of Bulk Rezoning expansion of the V&AW indicated that the degree of visual impact was acceptable. (Refer to 4.2)

References

1. V&A Waterfront Urban Design Guidelines with Revetment, 250818
2. Granger Bay Phase 2 Development Controls, November 2023
3. Cindy Postlethwayt. Draft HIA V&AW Granger Bay Reclamation 2025, 9 May 2025,
4. Lawson, Q and Oberholzer, B. Proposed Mixed Use Development of Erf 173712 Cape Town, Granger Bay Precinct and Associated Sea Defence Works, V&A Waterfront, Cape Town, Visual Impact Assessment, October 2017
5. Scenic Drive Network Management Plan (2003), City of Cape Town

Appendix A Terms of Reference