HERITAGE IMPACT ASSESSMENT
PORTIONS OF ERVEN 173712, 177853 AND 158570-RE, V&A WATERFRONT, CAPE TOWN
PROPOSED GRANGER BAY PRECINCT RECLAMATION

To be submitted for Comment in terms of Section 38(8) of the NHRA
HWC Case Number: HWC25061214SJ0612

APRIL 2026

Prepared by Cindy Postlethwayt, Professional Heritage Practitioner

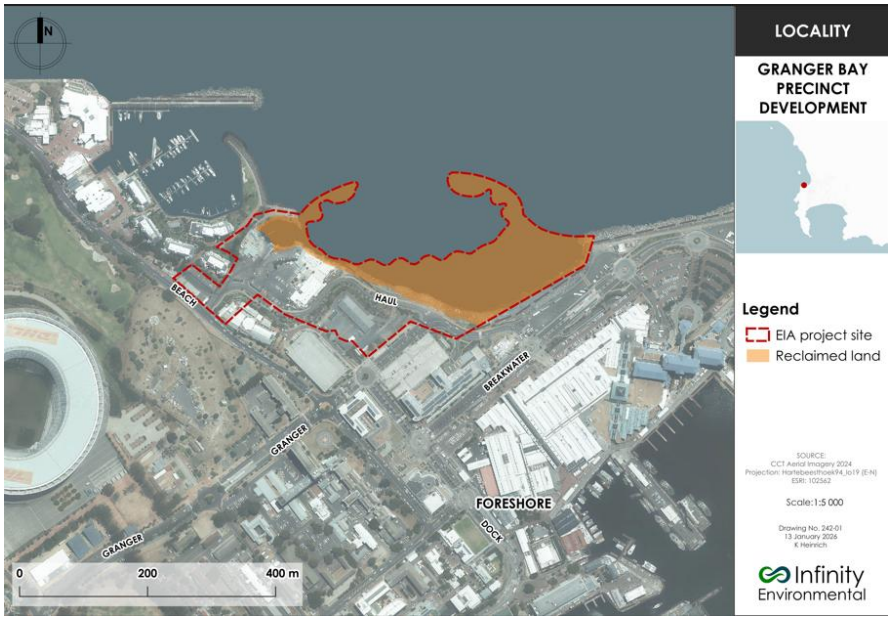
Cindy Postlethwayt

E: cindy@cpheritage.co.za

EXECUTIVE SUMMARY

1. Development Name:
Proposed Development of the Granger Bay Precinct and Reclamation of Land at the V&A Waterfront in Cape Town

2. Location:
The site comprises a portion of Erf 173712, 177853 and Erf 158570-RE, Granger Bay, V&A Waterfront in central Cape Town and the proposed project entails land reclamation.



Locality

3. Project proposal:
The proposed revised development at Granger Bay comprises two main components as follows:

- Replacement of coastal defence structures: associated revetment, breakwaters, and Land Reclamation.
- Revised mixed use development packages.

Replacement of coastal defence structures & coastal public access:
Seaward of the 100m setback line from the High-Water Mark, the site is proposed to be defined by a coastal amenity zone and two breakwaters. The proposed breakwaters and new rock revetment will protect the public coastal amenity zone that will include:

- An approximately 30 000m^2 bay area for water-based activities such as boat launching, leisure craft, sailing, kayaking, swimming, sailing.
- A Coastal park = approximately 1.70 ha
- A Coastal walkway = approximately 1.15 ha

The coastal park will inter alia comprise a slipway, fixed quayside, landscaped promenade, tidal pools, pedestrian paths and open areas.

As a replacement for the existing unprotected embankment and gravel beach, a permanent rock revetment and two breakwaters will be established to ensure shoreline protection, as well as providing shelter for portions of the site from storm action. These improvements are necessary as the existing gravel beach and unprotected embankment are not adequate to provide the necessary shore protection for long term development and infrastructure development of the site.

Mixed Use Development:
A backdrop of low to medium-rise mixed-use development is proposed to frame this coastal amenity. This will comprise residential, hotels, leisure, and some commercial development; the layout is intended to promote uses and activities that could take advantage of the ocean location of the site. The types of residential accommodation being considered include hotels, serviced apartments, and private apartments.

The total bulk assigned to these land uses is 78 000m^2 of existing development rights.

The orientation of development blocks and streets as well as the massing of buildings will respond to the coastal setting and maximise outward views of the ocean. In these buildings, large outdoor terraces are envisaged. Building heights will be in accordance with parameters established in terms of the heritage approval issued in 2011 and October 2024 which preserves a view arc across Granger Bay. Within the view arc, no buildings will be higher than 21,5m or approximately 5 floors. Outside the view arc, towards the intersection of Beach Road and Granger Bay Boulevard, building heights may step up.

4. Heritage Resources Identified:

There are few structures on the site and all are temporary, located in an ad hoc manner. It should be noted that the site is at present severely degraded, essentially owing to shore protection measures and extensive temporary spoil dumping. It is around 50% reclaimed land and the site itself thus has low intrinsic heritage significance.

The primary character component of any significance present is the spatial and visual contact with the water's edge (IIIA). In respect of the public access to the water's edge, the coastal pedestrian walkway and boardwalk runs for almost the entire length of the V&AW Granger Bay landholding on its northern coastal edge, but is interrupted by the restrictions of the slipway operation and the Grand Cafe & Beach development.

The nature of public ocean access, currently in the form of the Oceana Power Boat Club slipway and the association with the "snoek run", has socio-historical significance, although it must be noted that this is not currently general public pedestrian access, but access to launch boats. The current buildings are temporary or contemporary. For an extensive and continuous period the slipway has operated as a launching site for small boats related to subsistence and commercial fishermen as well as for recreational craft. The slipway is one of the very few safe entry points into Table Bay for small boats and for the general public. Managed, non-exclusive boat access to the ocean is regarded as being of high significance to these users (IIIC).

Heritage resources in the immediate vicinity are located off site (in particular Fort Wynyard) but have some key implications for future development opportunities in Granger Bay.

Fort Wynyard

It should be noted that the fort is presently severely neglected and has been allowed to become derelict in places. It may be impacted by spill-over from the illegal occupation of the defunct Helen Bowden Nurses Home, although this has not been confirmed.

Nonetheless, Fort Wynyard was declared a National Monument in 1976, now deemed a Provincial Heritage Site (PHS).

Maritime & Archaeological Significance

Fragmentary survivals of pre-colonial archaeological material (principally coastal shell middens) are possible where undisturbed coastal sediments survive, even where currently buried under later landfill or development.

No graves or burial grounds have been recorded within the Granger Bay Land Reclamation project, but it is possible that unmarked burials could be present in the same areas of the site that may be archaeologically sensitive. Such, usually pre-colonial graves, are an extremely sensitive and often contested heritage resource, and it is generally impossible to predict their presence in advance of development.

A building indicated as belonging to the Cape Canning Company Limited, which operated out of Granger Bay in the latter half of the 19th century and early years of the 20th century, is shown on maps of

the time, although any surviving evidence of this structure is likely to have been lost when the Water Club marina development took place. The site of the fish factory and Granger Bay itself are also both outside of the V&AW landholding.

Within the V&AW, a comparison of maps of the area between Granger Bay and the Breakwater, drawn in 1896 and 1911 indicates the construction of a 'blockyard' with a branch railway line from docks along the coast here, probably for use in the ongoing lengthening of the breakwater. This rail infrastructure is clearly visible in the 1945 aerial photograph of the area. The remains of this rail/harbour infrastructure seem to have been removed in 1997 and 1998 and the site cleared before being partially redeveloped. There are no extant features of archaeological significance visible on the site.

As such, the area is of very low historical archaeological significance, and no specific mitigation is recommended except that where new development or earthworks have the potential to reach the depth of the former, historical land surface it is recommended that this work is archaeologically monitored.

Although there is the potential for the presence of submerged prehistoric archaeological material within the maritime portion of the Granger Bay Land Reclamation project area, this is likely to be extremely low. The nature of the proposed work in this area – depositing of fill on the seabed – also means that the direct interventions into the seabed that might encounter such material will not take place.

No wrecks have been previously reported in the Granger Bay Land Reclamation project and overall, the likelihood of encountering historical wrecks in the area is low.

Heritage sites in the local context.
There are a large number of sites in the local context, of provincial and local heritage significance, which together constitute a mid-19th century cultural landscape of considerable heritage significance. They include:

- The New Somerset Hospital (PHS) (1860) and its forecourt.
- The complex of buildings including the City Hospital along Portswood Road which reflect the role of the site in health care during the latter half of the 19th century.
- The Green Point Common PHS.
- The Victoria and Alfred Basins and associated maritime buildings including the Convict Station and Industrial Breakwater Prison on Portswood Road which functioned during the latter half of the 19th century and which reflect significant trends such as the use of convict labour in harbour construction.
- City scale views to the coastline from Signal Hill and local views along Beach Road.

The Granger Bay site forms part of this broader cultural landscape, which assessment of potential impacts of the proposal needs to take into consideration. However, it is also noted that aside from the area within the Arc of Fire determination (and so is identified as a Buffer Area in terms of the area identification of the Draft V&AW Conservation Management Plan - CMP), and the coastline, the remainder of Granger Bay is designated as Peripheral, with limited, if any significance.

5. Anticipated Impacts on Heritage Resources:
With some exceptions, the Urban Design Guidelines and Granger Bay Phase 2 Development Controls provide sufficient guidance on the relatively limited matters of heritage concern.

The core, buffer and periphery defined in the draft CMP correlate with the degree of visual intrusion that might be anticipated across

the V&AW, with the core area being the most sensitive. However, the proposed development of Granger Bay could only be classified as being visually intrusive by these standards given that the current context is open and largely underutilised space.

At the largest scale, adherence to the existing townscape character of the surrounds would ensure an acceptable degree of visual impact. The assessment of new development from the distant Signal Hill viewpoint outside the site reveals a scaling down of height from the city and the ribbon of blocks of flats along Beach Road in Greenpoint towards the lower- and fine-scaled historic core of the V&A Waterfront. This approach is judged to be acceptable as it ensures a degree of visual absorption into the receiving environment, by placing taller structures and additional bulk adjacent to areas of the city where they are already existing, and thus ensuring contextual continuity.

The proposed 2025 Granger Bay Phase 2 built development has a greater footprint than the 2019 scheme, because there is development proposed on land to be reclaimed. 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 buildings in the 2025 scheme are generally lower with the higher buildings adjacent to Granger Bay Boulevard where they are in scale to the width of the road and cascade in height towards Table Bay. Heights adjacent to the coastal walkway are lower and the facades are proposed to be interactive. The building height restriction in the 'arc of fire' from Fort Wynyard remains the same for both schemes. As does the 30m wide corridor in front of Fort Wynyard down to the sea and Table Bay is provided in both schemes, as well as Granger Bay Boulevard.

The principle of 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 Waterfront Hotel in the east and a large coastal park, which will have a high, positive impact.

Access to launch boats and water craft from a new slipway is unimpeded.

In general, the heritage indicators have been satisfied, although conformity with the indicators in respect of the details of the coastal public open spaces and access plan should be confirmed at SDP level.

The significance of visual impacts is expected to be high without mitigation, reducing to medium with mitigation.

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

A number of mitigation measures proposed for the 2019 scheme are now included in the Granger Bay Development Controls. New mitigation measures are required for the buildings extended onto the reclaimed land at the northern extent of Granger Bay.

6. Recommendations:

It is recommended that Heritage Western Cape:

- Endorses this report as having met the requirements of Section 38(3) of the NHRA;
- In terms of Section 38(8) of the NHRA provides Final Comment to support the Granger Bay Reclamation Precinct Development Plan; Urban Design Guidelines and Granger Bay Phase 2 Development Controls described in Annexure F of this report, subject to the following:
    - implementation of mitigations outlined in Section 15 (pages 90 to 93), which should be included in the project Environmental Management Programme (EMPr);
    - Details of the coastal public open space and access, including the promenade, the public amenities relating to the revetments and bay; and Breakwater Park, and

including the related building setbacks, form and massing, are to be assessed for each precinct at SDP level for conformity with the indicators, guidelines and controls proposed in this HIA.

7. Author/s and Date: This HIA (April 2026) has been prepared by Cindy Postlethwayt.

The Project Team additionally comprises, *inter alia*:

- Archaeological Impact Assessment: TerraMare
- Visual Impact Assessor: MALA
- Environmental practitioners: Infinity Environmental Consultants
- Urban Designer: V&AW team

8. Procedures followed: The HIA follows the requirements of s38(8) of the NHRA. The draft integrated HIA was advertised for comment and comments have been incorporated for consideration into the HIA as part of the EIA process. No heritage related objections were received.

CONTENTS

SPECIALIST DETAILS, EXPERTISE AND DECLARATION 9
1. Property locality 10
2. Background & brief 11
2.1 2019 approved Granger Bay land reclamation 11
2.2 Proposed revisions to Granger Bay land reclamation 11
3. Legal requirements 12
4. Approach & Methodology 13
5. Assumptions and Limitations 15
6. Policy & Precedent Context 15
6.1 City of Cape Town Heritage Audit 15
6.2 Table Bay District SDF 2023 16
6.3 V&AW precedent approvals 17
7. Historic Overview 20
8. Site 24
9. Archaeology 34
9.1 Pre-Colonial Terrestrial Archaeology 34
9.2 Terrestrial Historical Archaeology 35
9.3 Submerged Prehistory 37
9.4 Maritime Archaeology 39
10. Visual analysis 41
11. Heritage Resources & significance 44
12. Heritage Design Informants 47
13. Development Proposal 50
14. Heritage Impact Assessment 67
14.1 Precedent approvals 67
14.1.1 Previous HWC Final comment on the 2019 straight line revetment scheme. 67
14.1.2 HWC approval of the V&AW rezoning and bulk expansion application, 2024. 68
14.2 Impact Assessment 69
14.2.1 Archaeology 70
14.2.2 Fort Wynyard site lines 73
14.2.3 Other potential visual impacts 76
14.2.4 Access to the slipway 84
14.2.5 Public pedestrian access to the shoreline 84
14.2.6 Contextual informants 88
14.2.7 ICMA factors 89
14.2.8 Cumulative Impacts 89
14.3 Conclusion 89
15. Mitigation 90
15.1 Pre-Colonial Archaeology 90
15.2 Terrestrial Historical Archaeology 91
15.3 Submerged Prehistory 91
15.4 Historical Shipwrecks 91
15.5 Interface Water Club & Packages 1 and 2 91
15.7 Roads, Parking and Services 92
15.8 Landscaping 92
15.9 Building Forms & finishes 93
15.10 Construction Phase 93
15.11 Monitoring 93
16. Socio-economic benefits 93
17. Public Consultation 94
18. Recommendations 96

ANNEXURE A: SPECIALIST DETAILS, EXPERTISE AND DECLARATION 97
ANNEXURE B: Previous approvals and 2025 RNID 98
ANNEXURE C: Archaeological Impact Assessment 99
ANNEXURE D: Visual Impact Assessment 100
ANNEXURE E: Criteria heritage significance 101
ANNEXURE F: Development proposal 102
ANNEXURE G: Impact Assessment Tables 103
ANNEXURE H: Public Participation 105

Cindy Postlethwayt hereby declares that I have no conflicts of interest related to the work of this report. Specifically, I declare that I have no personal financial interests in the property and/or development being assessed in this report, and that I have no personal or financial connections to the relevant property owners, developers or financiers of the development. I declare that the opinions expressed in this report are my own and a true reflection of my professional expertise.

All intellectual property rights and copyright associated with Cindy Postlethwayt's services are reserved, and project deliverables, including hard and electronic copies of reports, maps, data, and photographs, may not be modified or incorporated into subsequent reports in any form, or by any means, without accurate referencing to this work. Any recommendations, statements or conclusions drawn from, or based upon, this report, must be accurate and make reference to the source.

SPECIALIST DETAILS, EXPERTISE AND DECLARATION

Abbreviated Curriculum Vitae & Declaration Annexure A

Details of the specialist

This study has been undertaken by Cindy Postlethwayt BSoc Sci, MCRP (APHP accredited heritage practitioner), heritage consultant.

Email: cindy@cpheritage.co.za

Position On Team: Lead heritage practitioner

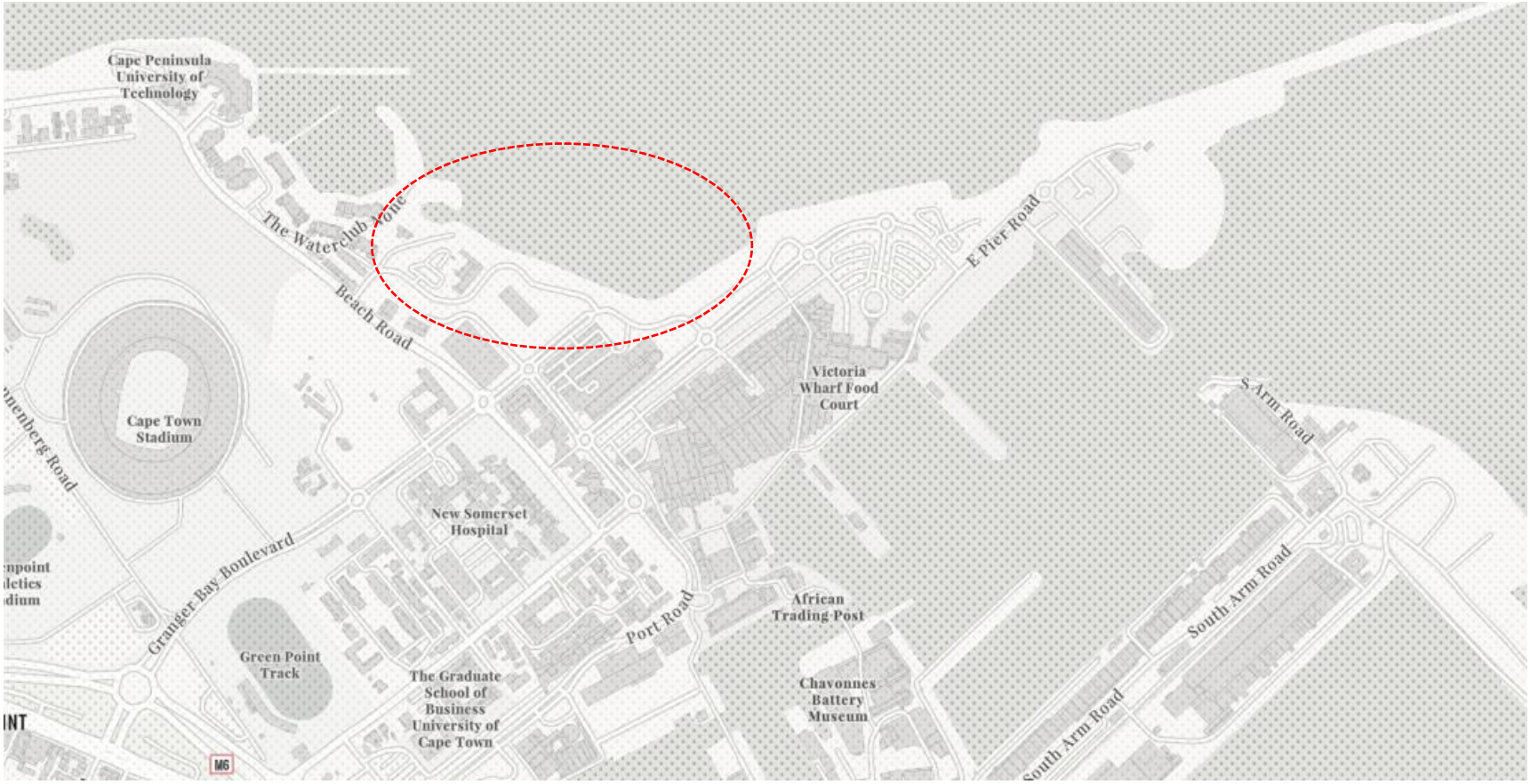


Figure 1: General locality of the project site

1. Property locality

The site comprises a portion of Erven 173712 and 177853, Granger Bay, V&A Waterfront in central Cape Town and the proposed project entails land reclamation.

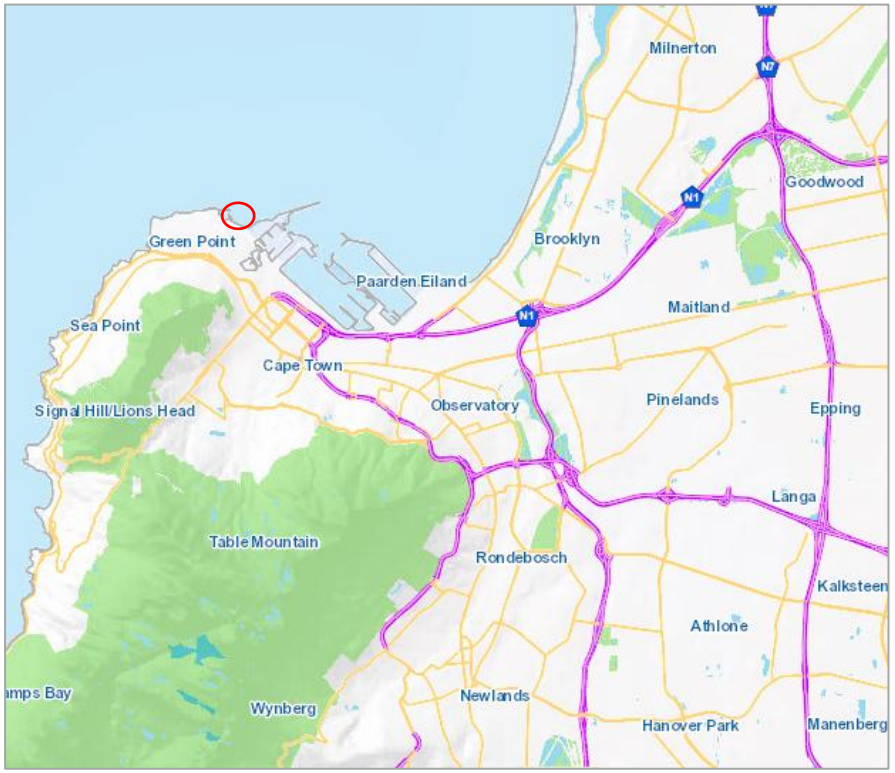


Figure 2: Site in the context of Cape Town

Figure 3: The V&A Waterfront and site in the central Cape Town local context

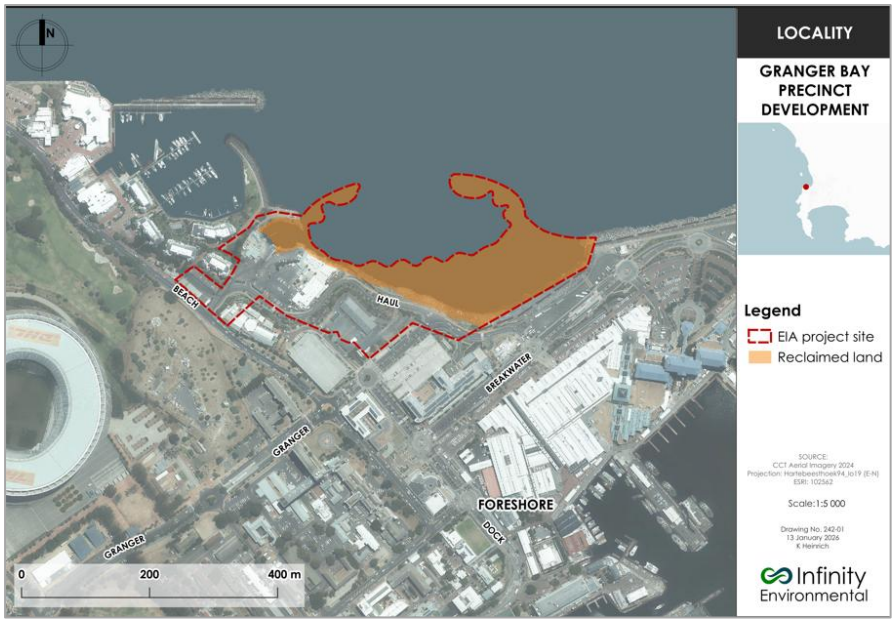


Figure 4: Locality Plan (Infinity)

2. Background & brief

2.1 *2019 approved Granger Bay land reclamation*

Over the period 2014 to 2019, a NEMA process was undertaken for a proposed land reclamation project in Granger Bay at the V&A Waterfront. An HIA was conducted by Dr Nicolas Baumann (HWC Reference 15050401GT0527M). Quinton Lawson and Bernard Oberholzer prepared a Visual Impact Assessment (VIA) for the proposal. An Archaeological Impact Assessment was conducted by Tim Hart of ACO Associates. Heritage Western Cape (HWC) issued Final Comment on 15 July 2015; and the final Environmental Authorisation (EA) was issued on 10 April 2019, both in support of the proposal. These are included as Annexures B1 and B2.

The approved development comprised two main components

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

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).

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.

2.2 *Proposed revisions to Granger Bay land reclamation*

The V&AW are now proposing revisions to the 2019 approved Granger Bay land reclamation project:

- Replacement of coastal defence structures: associated revetment, breakwaters, and Land Reclamation.
- Revised mixed use development packages

The key amendment to the 2019 EIA approval is the reshaping of the proposed revetment, the inclusion of two ('east' and 'west') breakwaters and the inclusion of public amenities within shoreline protection infrastructure. Certain development packages will also be reshaped and two new development parcels are proposed.

Further details of both schemes are provided in Section 13 below.

These amendments trigger the requirements of the Acts specified in Section 3 below, and thus the requirement for this Heritage Impact Assessment (HIA).

3. Legal requirements

The National Heritage Resources Act (NHRA) came into force in 2000 with the establishment of the SAHRA, replacing the National Monuments Act (No 28 of 1969 as amended) and the National Monuments Council as the national agency responsible for the management of South Africa's cultural heritage resources.

The NHRA reflects the tripartite (national/provincial/local) nature of public administration under the South African Constitution and makes provision for the devolution of cultural heritage management to the appropriate, competent level of government. In the Western Cape this is HWC.

Because national government is responsible for the management of the seabed below the mean high water mark, however, the management of maritime and underwater cultural heritage resources under the NHRA does not devolve to provincial or local heritage resources authorities but remains the responsibility of the national agency, SAHRA.

This HIA, together with the AIA must, therefore, be submitted to both SAHRA and HWC for their comment as part of the statutory EIA public comment process.

As per the definitions provided above, these archaeological resources are protected by the NHRA and a permit from SAHRA (currently) is required to destroy, damage, excavate, alter, deface or otherwise disturb any such sites or material.

It is also important to be aware that in terms of Section 35(2) of the NHRA, all archaeological material is the property of the State and must, where recovered from a site, be lodged with an appropriate museum or other public institution.

Section 38(1)(a), (c)(i), and (c)(ii) of the National Heritage Resources Act (NHRA) are also triggered by the proposed development. Heritage Western Cape (HWC) have required a Heritage Impact Assessment (HIA) in a Response to the Notification of Intent to Develop (RNID), dated 25 June 2025, which HIA must in addition have specific reference to the following:

- Visual Impact Assessment (VIA)
- Archaeological Impact Assessment (AIA)

The RNID is included as Annexure B3.

A full Environmental Impact Assessment (EIA) process is required in terms of the National Environmental Management Act (NEMA). The HIA is thus to be conducted in terms of Section 38(8) of the NHRA and HWC is a Commenting Body.

The existing NEMA authorisation (2019) was issued based on an EIA process that commenced before the provisions of section 7C of the National Environmental Management: Integrated Coastal Management Act (ICMA) came into effect. This section of the ICMA requires ministerial pre-approval, and parliamentary ratification, before a NEMA environmental authorisation may be issued for the reclamation of land from the sea for private purposes. It is therefore

not possible for DEA&DP to consider an amendment to the existing environmental authorisation. A new application for EA must be submitted to DEADP, and a new Scoping and EIA process is underway.

- The land reclamation application must be submitted to the national authority before an application for EA can be submitted to DEADP.
- The Scoping and EIA process will occur in parallel with the Ministerial Pre-approval and Parliamentary Ratification of the application for reclamation.
- Ministerial Pre-approval is required to be submitted to DEADP along with the final EIA Report.
- DEADP will make a decision on the application for EA based on the information presented in the final EIA Report. – however, an EA may not be granted without the pre-approval being in place.
- The Environmental Authorisation is required for the Minister to make a final decision on the land reclamation application.

The ICMA is intended to ensure that development and the use of natural resources within the coastal zone is socially and economically justifiable and ecologically sustainable.

Section 7C of the ICMA notes that reclamation of land from the sea will be considered only in exceptional circumstances and when it is not contrary to the purpose of coastal public property (i.e. to improve public access to the seashore, to protect sensitive coastal ecosystems, to secure the natural functioning of coastal processes, and to provide protection from dynamic coastal processes including sea level rise.

Section 63 of the ICMA states that where an environmental authorisation in terms of Chapter 5 of the National Environmental Management Act is required for coastal activities, the competent authority must take into account various specified factors over and above the standard considerations, including:

- Consistency with the purpose of coastal public property and coastal access,
- Socioeconomic 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.

To the extent relevant to heritage, the HIA is required to take account of and report on these matters.

4. Approach & Methodology

This HIA is structured to fulfil the requirements of the NHRA Section 38(3):
(a) The identification and mapping of all heritage resources in the area affected;
(b) an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7;
(c) an assessment of the impact of the development on such heritage resources;
(d) an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;
(e) the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;
(f) if heritage resources will be adversely affected by the proposed development, the consideration of alternatives; and
(g) plans for mitigation of any adverse effects during and after the completion of the proposed development.

It is also designed to respond to the requirements of HWC, generally in accordance with their Guidelines for HIA submissions (2021), and specifically in accordance with the requirements outlined in the RNID.

SAHRA has published *Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports* (SAHRA, 2007), in terms of which standards an AIA must:

- Identify the archaeological sites on a proposed development site;
- Assess their significance;
- Comment on the impact of the development on these archaeological resources; and
- Make recommendations for their mitigation or conservation as appropriate.

Similarly, HWC has published its *Guide for Minimum Standards for Archaeology and Palaeontology Reports submitted to Heritage Western Cape* (HWC, 2021) which lays out its requirements for a range of reports, including specialist reports produced during the impact assessment process.

This HIA complies with both SAHRA and HWC's minimum standards. For the methodologies entailed in the AIA and VIA, see attached reports.

The HIA is also to 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.

The registered Conservation Body with an interest in this area is the Green Point Ratepayers' & Residents' Association. They, together with SAHRA, the City of Cape Town Heritage Resources Management (CCT HRM) and other I&APs identified through the previous HIA and the NEMA process will be asked to comment on the Draft HIA.

This HIA:

- assumes the previous archaeological, historical and townscape analysis, assessment of heritage significance and heritage indicators as a given;
- provides any updates as relevant (such as subsequent development, any policy changes, indicators as relevant to the proposal at hand, etc); and
- Two alternatives are to be assessed:
    - Alternative 1: No-go alternative
    - Alternative 2: Development proposal
- Since this is to be a de novo application, there is no NEMA requirement for a comparative assessment for heritage related impacts of the approved project, versus the current proposal. However, HWC has required this, and there will therefore be some comparative assessment for the purpose of providing context to the decision making.

More specifically, the methodology has involved the following:

- *Scale of Analysis:* three scales of analysis inform the assessment of significance – that of the broader urban landscape context; the more localised scale of the surrounding urban areas; and the site. A morphological analysis of the affected landscape and site was undertaken to assist in understanding the heritage and visual sensitivities and inform the nature of the proposed development for the site.
- *Policy Review:* A review of relevant heritage and planning policy frameworks informs the assessment.
- *Specialist study:* The findings of specialist studies have been integrated as appropriate into the report.

- *Design Informants*: Heritage and related issues are identified, and heritage design informants (HDI) proposed to guide future development. These are derived from previously approved HDI, current policy frameworks, the historical and morphological analyses and the statement of heritage significance.

The following sources of material have been consulted:

- Historical reports and maps
- Surveyor General records search
- Previous heritage studies insofar as they related to the current study. This includes the 2015 HIA for the approved development of this site and associated reference material, to gain an understanding of the history of the site.
- On-site inspections to update information on the site and the relevant context and to establish the physical properties of the site and landscape and identify the patterns and features of historical and visual significance.
- A review of the relevant legislation that informs this study.

The project team includes, inter alia:

- Archaeology: TerraMare
- Visual Impact Assessor: Megan Anderson Landscape architect (MALA)
- Environmental practitioners: Infinity Environmental Consultants
- Urban Design & Town Planning: V&AW in-house team

5. Assumptions and Limitations

As a standard preface, it is accepted that historic records must always be open to question. As examples (and following Hart T), before 1652, there was no formal standard by which place names were derived. Thus caution must be exercised in using early historic spatial records. Restrictions of the written archival record include contemporary selection, modern selection, bias and interpretation. Records written reflect the author's or a section of society's point of view of events. Archaeological records equally have inherent restrictions - in particular, with respect to highly mobile herding communities who seldom spent enough time in one place to leave an identifiable archaeological signature (Smith et al. 1991, Hart 1984).

It is noted that the significance of a heritage resource is dynamic and multi-faceted, as interest groups and societal values change over time. It is thus neither possible, nor appropriate to provide a definitive statement of heritage significance. Nonetheless, every effort has been made to ensure that the heritage statement is as accurate a reflection of significance as is currently possible to ascertain.

The information and assessments supplied by others (including historical and environmental background information from earlier applications) are assumed to be accurate and a fair representation of the circumstances or proposed development. It is assumed all relevant information has been or will be disclosed.

This report will not address heritage impacts beyond the site boundaries that may result from the laying of pipelines, electrical and other related infrastructure between the site and elsewhere should it be required.

Other assumptions and limitations are included in the individual specialist reports, appended to this HIA.

6. Policy & Precedent Context

6.1 City of Cape Town Heritage Audit

The Draft Victoria & Alfred Waterfront Conservation Management Plan & Heritage Inventory of the Built Form (January 2024) (henceforward referred to as the CMP), submitted to HWC for approval in January 2024 and currently in process, is assumed to be the primary informant to heritage based decision-making within the V&AW landholdings (see Section 11 below). This CMP was not in place at the time of the original HIA.

The City of Cape Town's heritage inventory grades:

- the Oceana Power Boat Club as IIIC ("*The building is less than 60 years old. Significance as one of the few landing facilities available to the public within the inner city. High social significance.*");
- Back Beach depot as IIIC ("*Buildings are contemporary. Significance is associational and relates to the Waterfront as a working harbour. Was part of the mid to late 20th century harbour development. Is a poor architectural example and has been altered. Has a poor interface with the harbour and the Waterfront. Provides very little context for the harbour.*);
- Lower Portswood 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 the New Somerset Hospital (outside the site) are Provincial Heritage Sites.

6.2 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'.

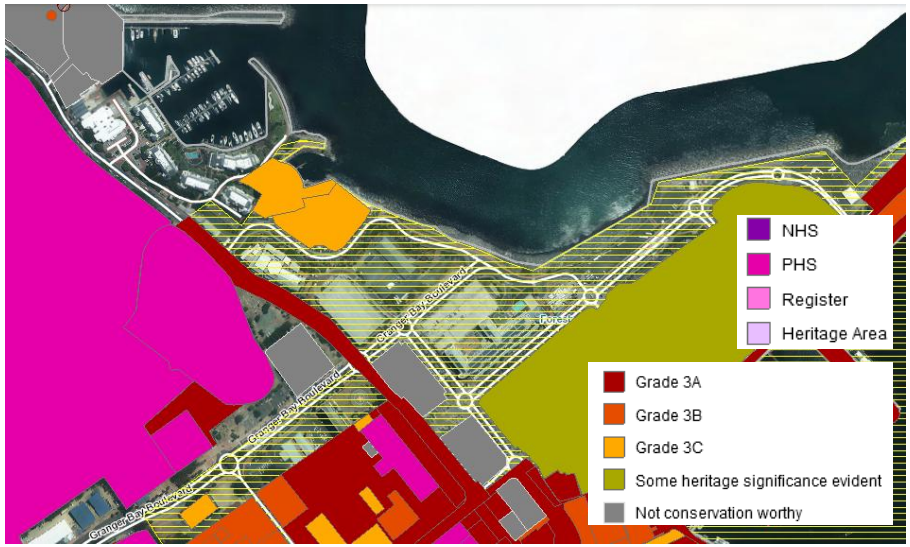


Figure 5: CCT Heritage Inventory (CCT)

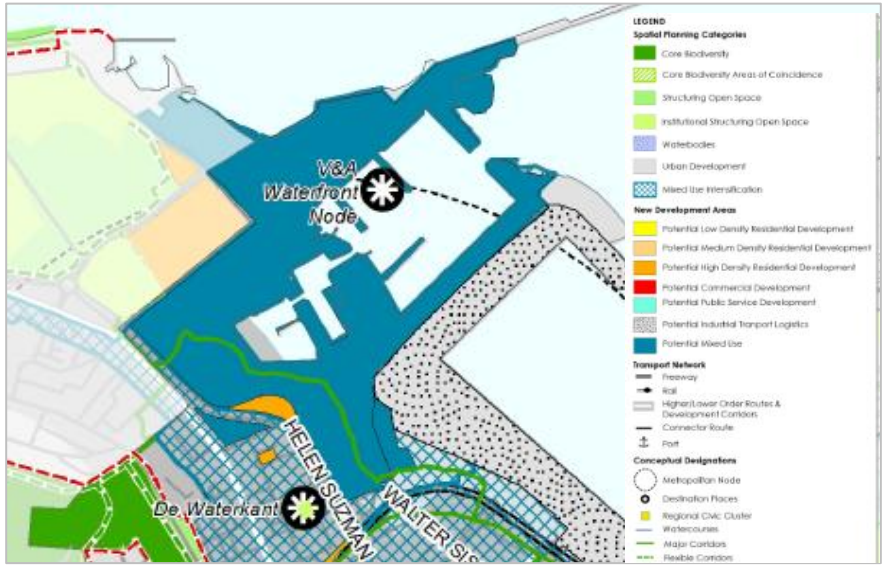


Figure 6: Table Bay District SDF, Sub-district 2

6.3 V&AW precedent approvals

There are a number of HWC approvals for the V&AW in place which are either of direct or contextual relevance for the project site.

Extracts have been made as relevant in the statement of significance and heritage indicators, but are listed here as informants to the HIA assessment. It is noted that the precinct delineations are not always congruent with the CMP defined heritage based character areas.

Beach Road Precinct Plan and Arc of Fire

A Phase One HIA for the Beach Road Precinct was compiled in 2008. The subsequent HIA was subject to an Appeals process and a hearing of an HWC Tribunal. The Record of Decision (RoD) which resulted from the Tribunal established the approved sight lines from Fort Wynyard related to the arc of fire. These sight lines, approved by HWC in the RoD dated 22 June 2011, and the primary heritage indicators, pertain to the Granger Bay Precinct.

This decision preserves view arcs across Granger Bay. 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. See Figures 6 and 7 below.

The height and massing of Parcel G was an approved Tall building on Beach Rd (16 floors and 10 floors) approved in this Precinct Plan HIA.

Granger Bay Precinct Plan 2014 & as amended 2019

The Granger Bay Precinct Plan was approved in January 2014 by the CCT. See Figures 8 and 9 below.

This was amended in the 2019 approved Granger Bay land reclamation, which approval is to be the subject of review in this HIA and will be detailed further in the impact assessment. The height and massing of Parcels F and H1 were approved in the Granger Bay EIA with maximum 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 (refer to Figures 10 and 11 below) specifically, as relevant to this application:

- 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

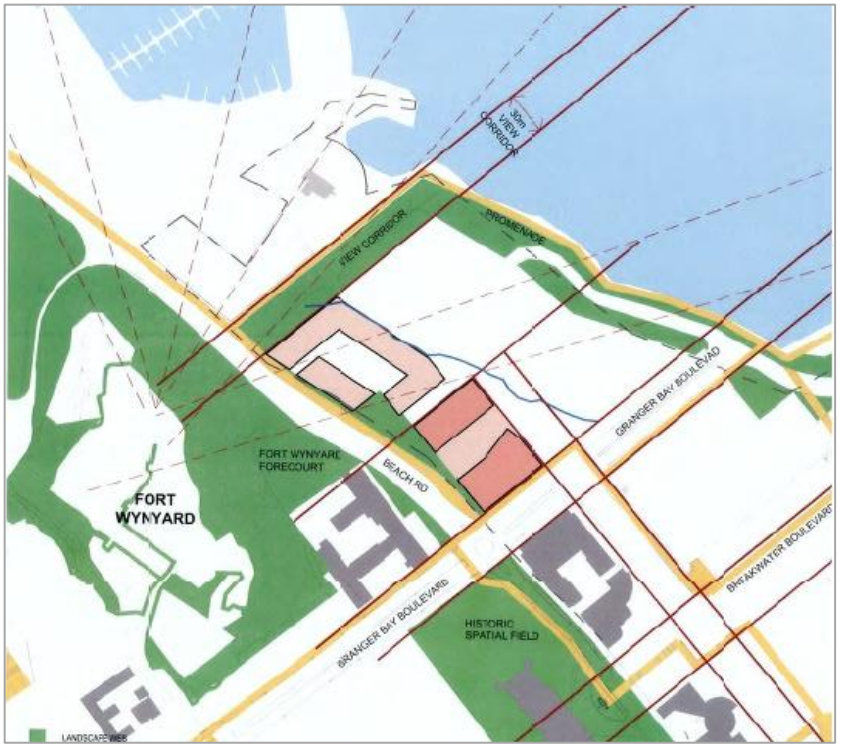


Figure 7: Conceptual Beach Road Precinct Plan 0800.10/50 Approved by Ministerial Tribunal 29 June 2011

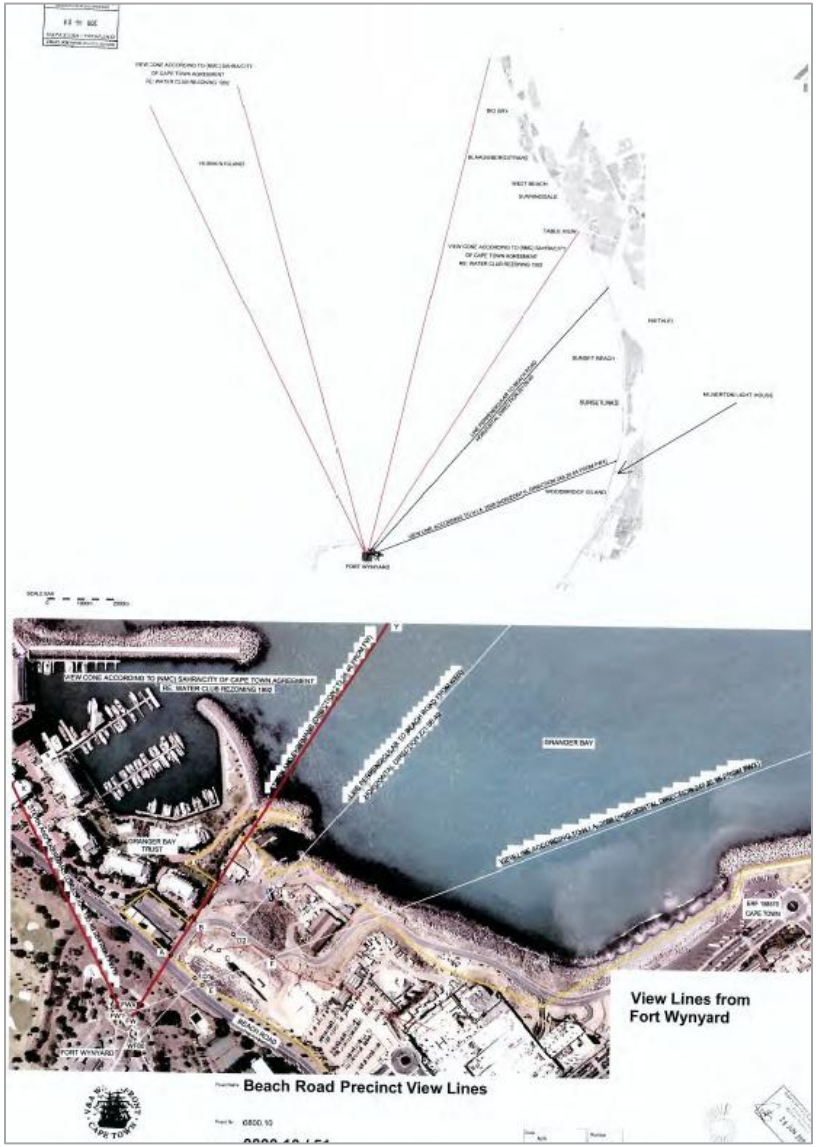


Figure 8: approved Beach Road Precinct view lines. Plan 0800.10/10

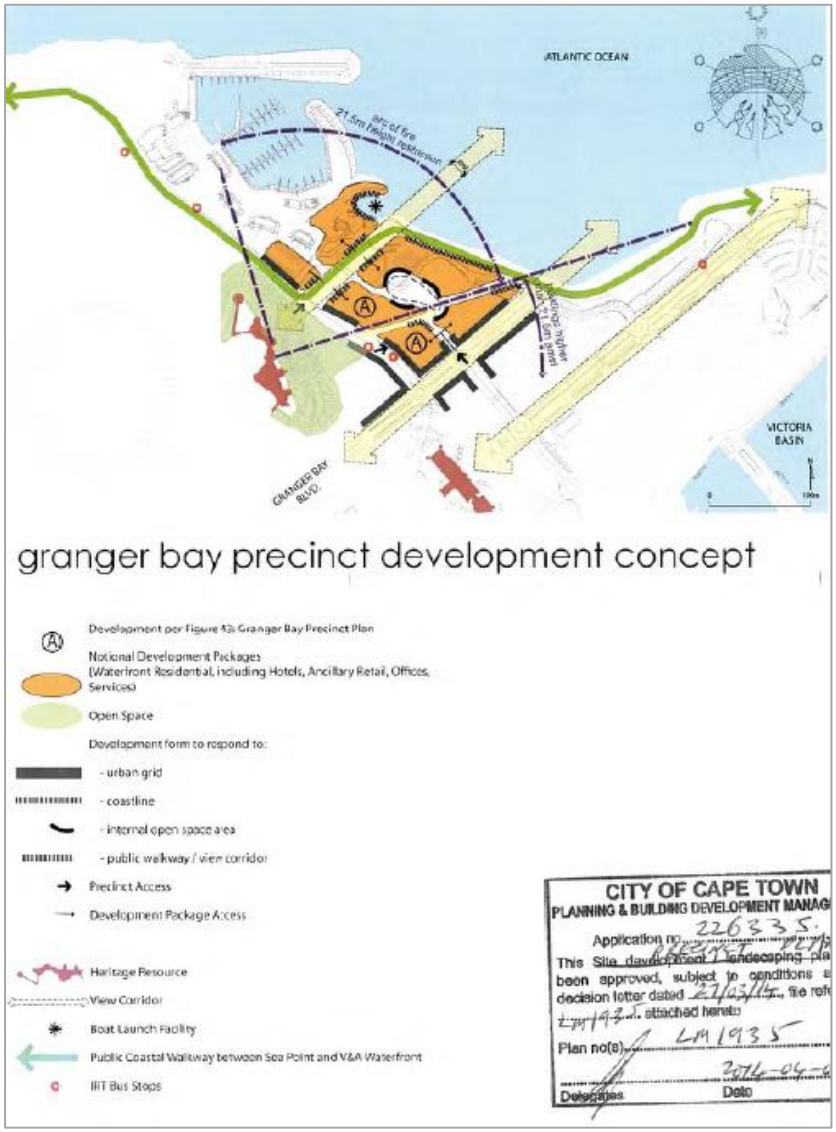


Figure 9: City Approved Granger Bay Precinct Development Concept January 2014

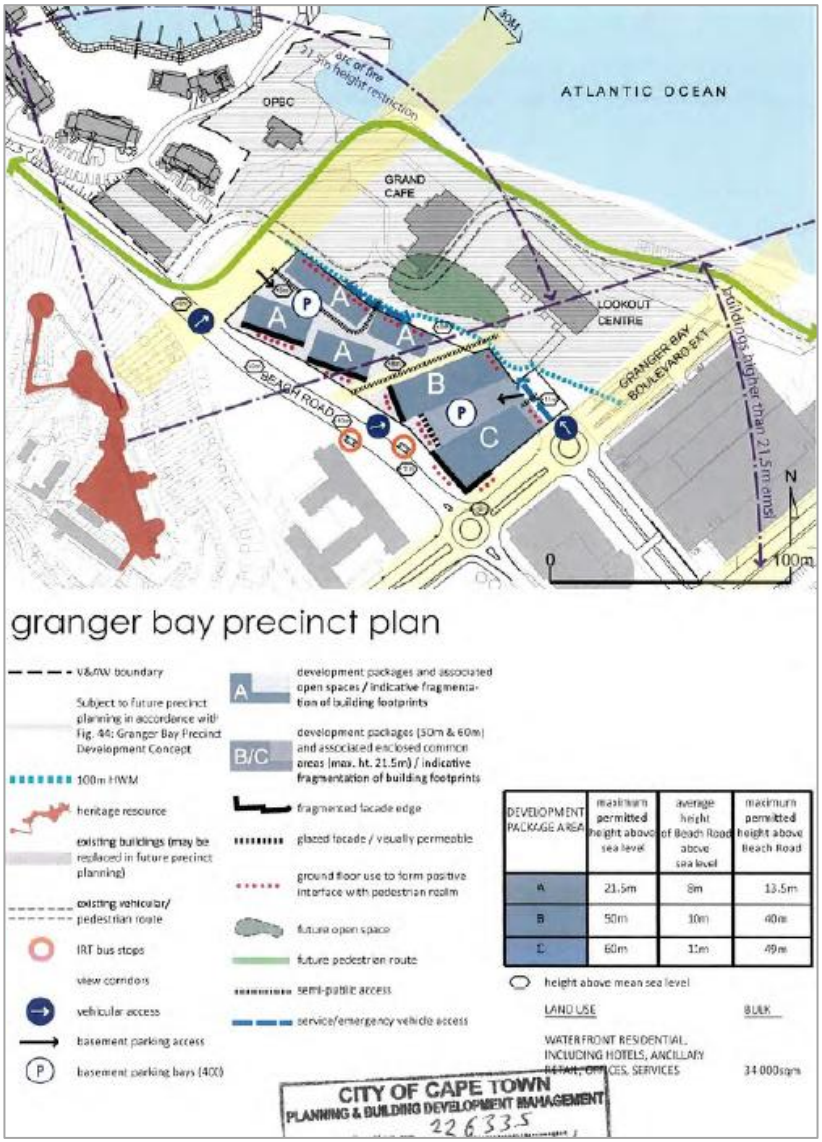


Figure 10: City Approved Granger Bay Precinct Plan - January 2014

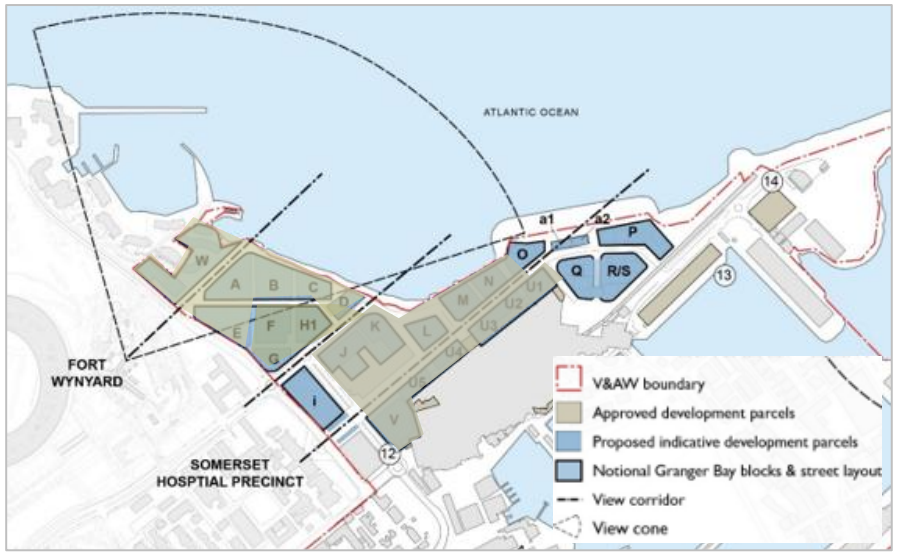


Figure 11: Development parcels, as relevant to this application 2024 HWC approved or no NHRA applications applicable

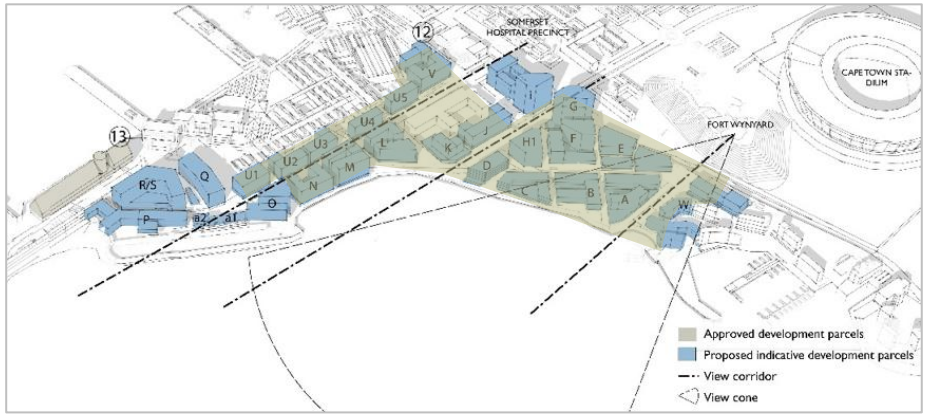


Figure 12: Development parcels, as relevant to this application 2024 HWC approved or no NHRA applications applicable, height and massing diagram, as contextually relevant to this application.

7. Historic Overview

This section is sourced directly from the 2015 HIA for this site (Baumann), without direct referencing for ease of reading. The assessment has been supported by HWC and there is no additional evidence requiring amendment. It is included to fulfil the requirement of Section 38(3)a.

Historically, the Granger Bay Precinct falls within a stretch of coastal plain which extended from the Buitengracht to beyond the Mouille Point of which the Green Point Common represents the remaining extent. Until the 19th century, this plain was characterised by calcrete dunes: the low dune on which Fort Wynyard is located is all that remains of this dune belt. During the late 19th and 20th centuries, the dunes were flattened to make way for the harbour, railway lines and highways.

A number of historical themes were identified in the initial heritage response to the development of the V&A Waterfront (Baumann 2007). These themes create linkages across the Waterfront area in time and space.

The predominant themes in the Granger Bay Precinct is that of defence related to the Fort Wynyard Battery and place of recreation and fishing relating to the slipway.

Table 1 (right): Predominant themes associated with the Beach Road and Granger Bay Precinct as part of the old harbour waterfront.

Period	Predominant themes impacting on the landscape	Material evidence/ evidence in the landscape/ physical fabric of the V&A
>1800	Place of Defence	Amsterdam/ Chavonnes Batteries/Kyk in de Pot
1860 – 1895	Convict Labour Contract Labour Maritime technology Harbour Technology – Construction Place of Distribution Place of Arrival Symbolic scenic qualities	Breakwater Prison/ Chavonnes Battery Site of Labour Compounds Alfred/Victoria Basin and adjacent edgings Arrival of all goods and travelers brought by sea to the town View from the water's edge to Table Mountain – iconic mountain silhouette Clock Tower/ Bell Tower Railway lines in present Clock Tower precinct.
1895 – 1925	Place of Defence and logistics of war Cape Colony as part of British Empire Contract labour	Role in SA War (1899-1902), WWI (1914-1918) as British port Site of labour compounds
1925 – 1945	Place of Distribution Place of Defence – sea route for troops sent to war in North Africa	Granary; Silos Harbour as stopover in troop movement (WWII)
1945 – 1960	Fishing Industry	Fish Market
1960 – 1990	Fishing Industry Symbolic role – place of contact with incarceration	Fish Market Robben Island Embarkation
1990 to present	Place of Commerce/Trade Place of Recreation (including tourism) Symbolic Role – Place of Liberation Scenic Qualities	Fish Market; Shopping Centres Markets; Breakwater Prison/ Chavonnes Battery Robben Island Embarkation Townscape qualities; Layering; Scenic Views

The Dutch Period

From the time that Cape Town was established as a refreshment station for the VOC ships en route between the East and Europe in 1652, the harbour has been protected by fortifications of some sort. The fortifications were a necessity, protecting the establishment not only from dangers from the hinterland, but also from aggression from rival trading companies owned by the English as well as the French. The Cape held a strategic position at the tip of Africa as the mid point between the very lucrative trade route between the East and Europe.

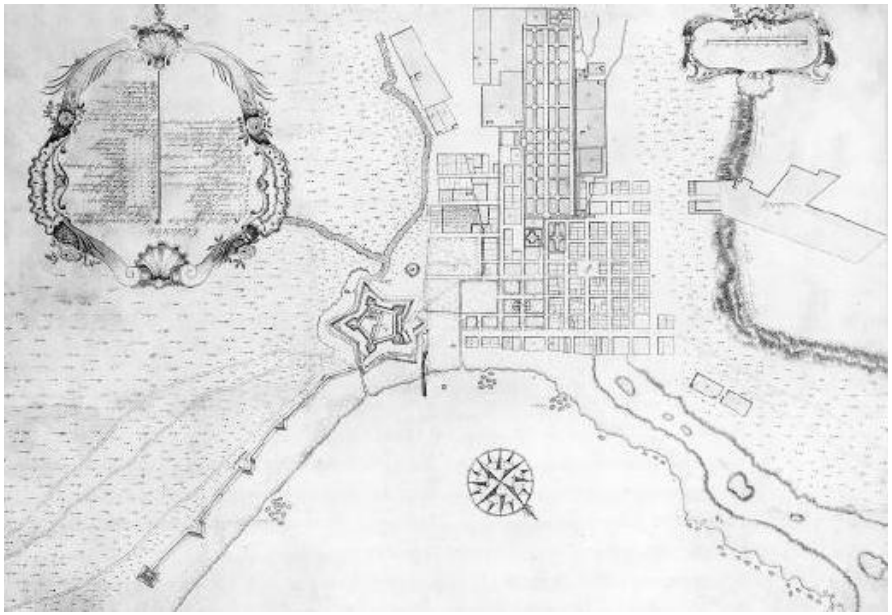


Figure 13: Map of Table Bay Table Bay c1767. Note the defence lines to the east of the Castle, and the Chavonnes Battery in the lower left corner (Worden et al 1998: 41 in Baumann 2015)

From the mid 18th century onwards, the coastline of Table Bay was characterised by batteries and defence lines extending from the Mouille Point in the west to Fort Knokke in the east. The Chavonnes Battery was the first to be built in 1715, followed in 1787 by the Amsterdam Battery and the Mouille Battery. In 1795, the Kyk in de Pot Battery was built as a response to British threats to take over the Cape after war broke out between Britain and France in 1781. The fear that the English would occupy the Cape in order to keep it out of the hands of the French was realised in 1795, when the English forces landed at Blouberg (well out of range of especially the Amsterdam Battery).

The British Period: 1795- 1827

Having secured the Cape as a half way station for the English East India trade, the English set about upgrading the military defences of the Cape. In 1812, a second powder magazine was built just behind the low hill on which the Kyk in de Pot Battery was situated (Figure 4). This magazine was nearby the principal store magazine, also known as the "Linker Groote Magazine'. The Kyk in de Pot Battery was altered several times: in 1806 and 1810 when it was armed with 4x 24-pounder brass guns.

In 1827, a peace accord was signed between the English and French, and many of these defensive works around Table Bay were dismantled, including the Kyk in de Pot Battery.

The British Period: 1827-1900

Fortifications

In 1861 the American Civil War broke out, and once again the defences of the Cape of Good Hope were a concern as it was feared that Britain may be drawn into the American war. The Amsterdam Battery was armed again and the Kyk in de Pot Battery was refurbished. Convicts from the Breakwater Prison were used as labour to reinforce the earthworks of this Battery. It was re-armed with 6x 32-pound guns and renamed Fort Wynyard in honour to Lieutenant-General RH Wynyard, who was acting Governor at the Cape 1861-1862.

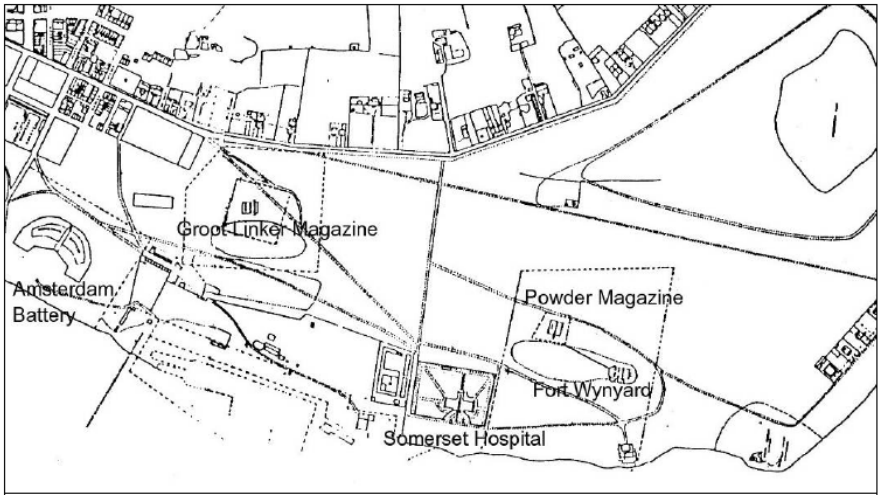


Figure 14: Snow survey of Cape Town c1860 shows the Powder Magazine and the dune on which Fort Wynyard was situated, enclosed by the boundary of the military reserve. No civilian buildings were allowed within this military reserve. Immediately to the north of Fort Wynyard is the fishery (now the site of the Oceania Powerboat Club) (Baumann 2015).

The Anglo Boer War broke out in 1899 and lasted until 1902. Although most of the action took place in the erstwhile Boer Republics, Cape Town was an important transit point: British soldiers were landed and deployed from Cape Town and Boer prisoners of war were shipped to St Helena, Ceylon and Bermuda from Cape Town. Troops were accommodated on the nearby Green Point Common and Boer prisoners of war were held inside the Green Point cycle track. Much of the existing Fort Wynyard complex dates to the late 19th century remodelling of the Battery.

Harbour development

The second half of the 19th century was characterised by massive expansion in the shipping industry and the Table Bay harbour. Towards the end of the 19th century, the Robben Island impact on the eastern end of the Common as a result of the harbour development was profound. The Chavonnes Battery was already demolished in the 1850s with the construction of the Alfred Docks. The construction of the railway network also dates to this period.

In the 1870s, the Table Bay Harbour Board bought additional land in a strip situated between the Amsterdam Battery and the then newly constructed Somerset Hospital along Beach Road for the expansion of harbour. At this time, large parts of the historic execution grounds and associated burial grounds at Gallows Hill were destroyed as well as the paupers' burial ground known as the "white sands".

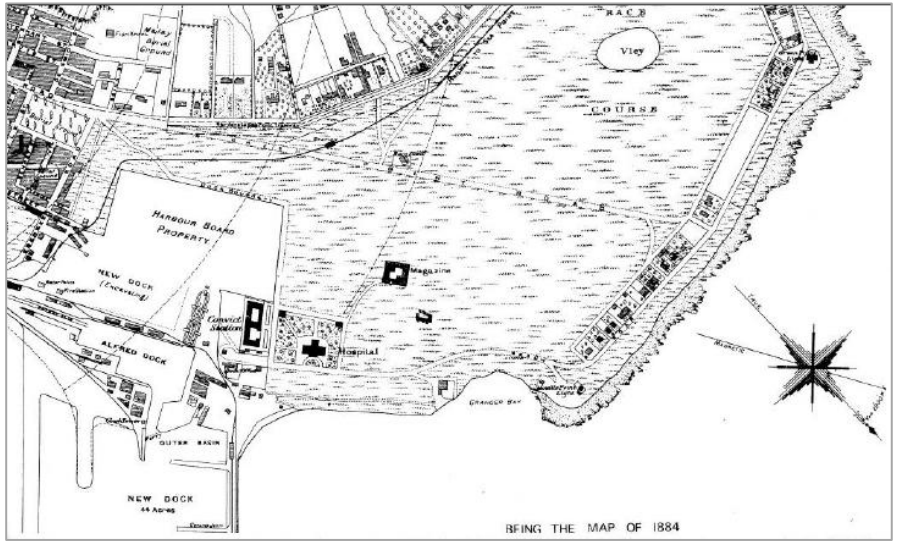


Figure 15: Map of Cape Town c1884 by Richards & Son (UCT Harg map collection) showing the harbour development (Baumann 2015).

<u>Twentieth Century</u>

Fortifications: Fort Wynyard

Fort Wynyard was active during both World Wars. After the Second World War, massive land reclamation schemes were implemented,

enlarging the harbour. In 1962, Fort Wynyard became the headquarters of the Coastal Artillery Maintenance Unit. In 1975, permission was obtained to convert Fort Wynyard into a museum and in 1976, Fort Wynyard was declared a National Monument. The Coastal Artillery Museum was opened in 1987 and continued until 1991.

Somerset Hospital
The Somerset Hospital on Beach Road was built to replace the old Somerset Hospital (c1818) on the site bound by Prestwich, Hospital, Alfred and Chiapinni Streets. The foundation stone for the new hospital was laid by Sir George Grey in 1859. The Somerset Hospital was designed by colonial engineer I. Scott Tucker, and initially housed 100 patients. It was completed in 1862. The hospital was enlarged several times.

In 1938, the Somerset Hospital was closed, only to be reopened a year later as the first "non-European" hospital in Cape Town. The original core of the Somerset Hospital was declared a National Monument in 1971 and is protected under the National Heritage Resources Act as a Provincial Heritage site.

Harbour/Waterfront development
Historical maps indicate that within the development area, a 'blockyard' and associated branch railway line from docks, probably for use in the lengthening of the breakwater, was constructed between 1896 and 1911.

Just outside the development area, a building belonging to the Cape Canning Company Limited, which operated out of Granger Bay in the latter half of the 19th century and early years of the 20th century, previously stood on the site. Any remains of this structure are likely to have been lost when the Water Club marina was developed.

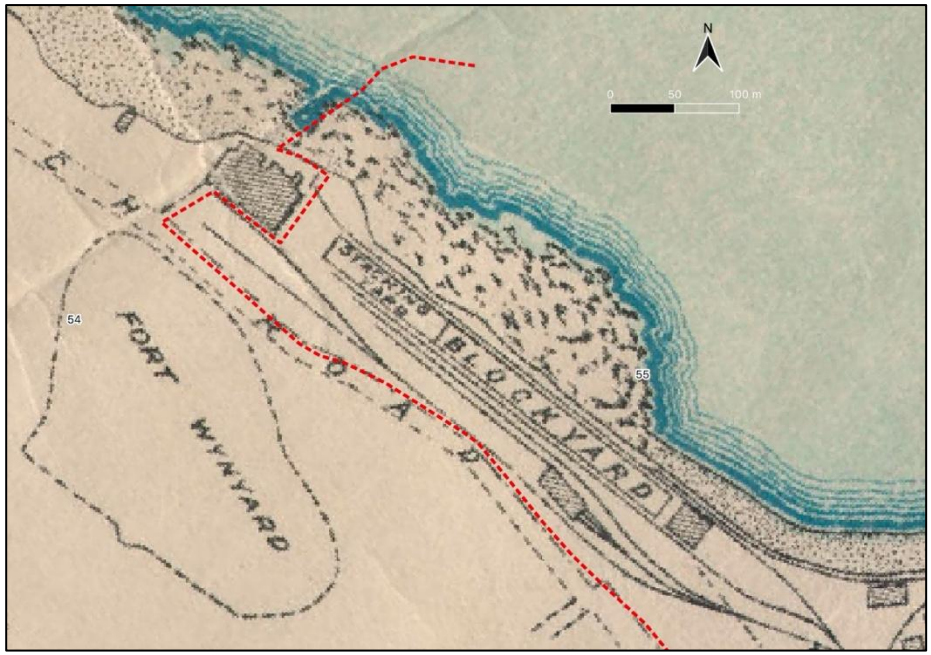


Figure 16: 1911 Harbour map showing detail of the area immediately east of Granger Bay. Note the old fishery building just outside the V&A boundary on the left of the image and the blockyard, stacking yard and railway line built along the seafront.

The 20th century saw the modernisation of Cape Town as a harbour city. Amsterdam Battery was partially demolished in 1905 to make way for a rail line linking Sea Point, the harbour and the city.

By the 1970s, with the construction of the Ben Schoeman docks, the main thrust of the harbour had moved eastwards, leaving the old Victorian harbour behind. Since the early 1980s, plans were proposed to redevelop the old Victorian harbour as a tourist and commercial centre. These plans were finally realised in the late 1980s when the Victoria and Alfred Waterfront Company was established and the old harbour in the vicinity of the Pierhead was redeveloped. At the same

time, Fort Wynyard was partially restored and the Coastal Artillery Museum established at the site.

8. Site

The site, also known as Granger Bay Precinct, is 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. The coastal site faces north, with views across Table Bay towards Robben Island and Blouberg in the distance. Signal Hill, about 2km to the south, overlooks the site.

It is located on a coastal platform, part of which is reclaimed land, the original coastline running roughly through the middle of the site. It is underlain by landfill deposited at various stages between the late 19th and late 20th centuries, related to the development of the harbour.

Figure 17: Aerial Imagery 1968 (CCT), illustrating the original coastline relative to the current coastline which follows the cadastral units illustrated.

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. It is mainly vacant and portions are leased by tenants, including the Oceana Power Boat Club and its boat launching facility, protected by a breakwater; the Grand Africa Café and Beach events venue in an old warehouse and a series of temporary structures; and a demountable 2 storey parking facility. The Lookout events and hospitality facility has been demolished. The Oranjezicht Farm Market has moved to Breakwater Residential parking area during the drafting of this report. The site is otherwise in a fairly derelict state mostly used by the V&AW for the temporary storage of large volumes of spoil. The Water Club residential development, marina and Radisson Collection Hotel, lies directly to the west, the historic Fort Wynyard and Somerset Hospital to the south, and the V&A Waterfront to the east. The Cape Town stadium dominates views looking southwest from the site. A pedestrian boardwalk and walkway with occasional viewing platforms is located along much the length of the coastal edge.

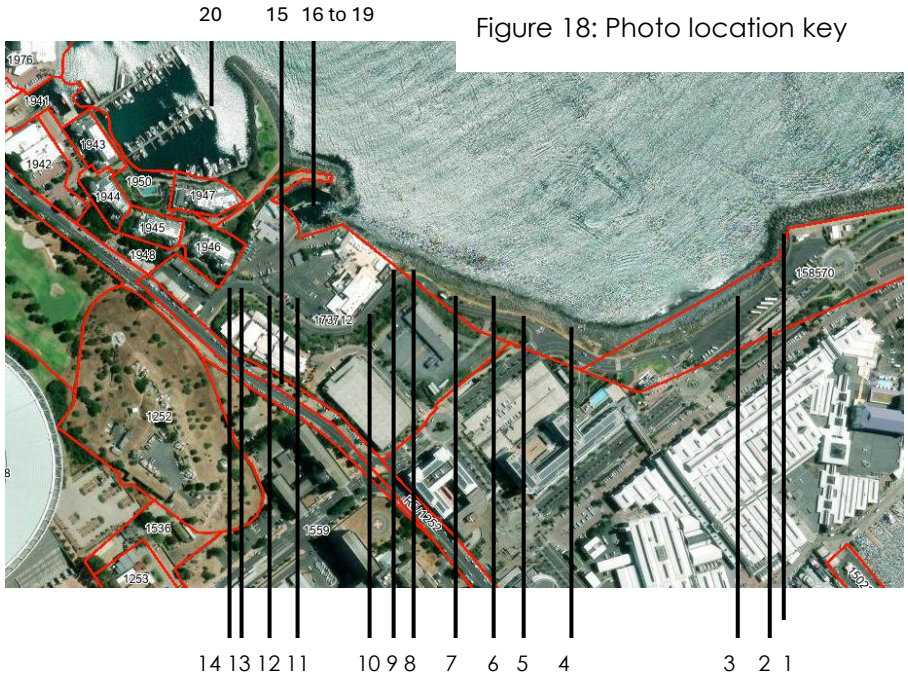


Figure 18: Photo location key

1: West across Granger Bay. Approximate area to be protected by new breakwaters indicated red, and approximate area of reclamation between existing shoreline revetment and yellow dash

2: West across Granger Bay

3: Pedestrian walkway behind revetment

4: West, close proximity to GB Boulevard

5: South, up GB Boulevard

6: West, spoil banks to

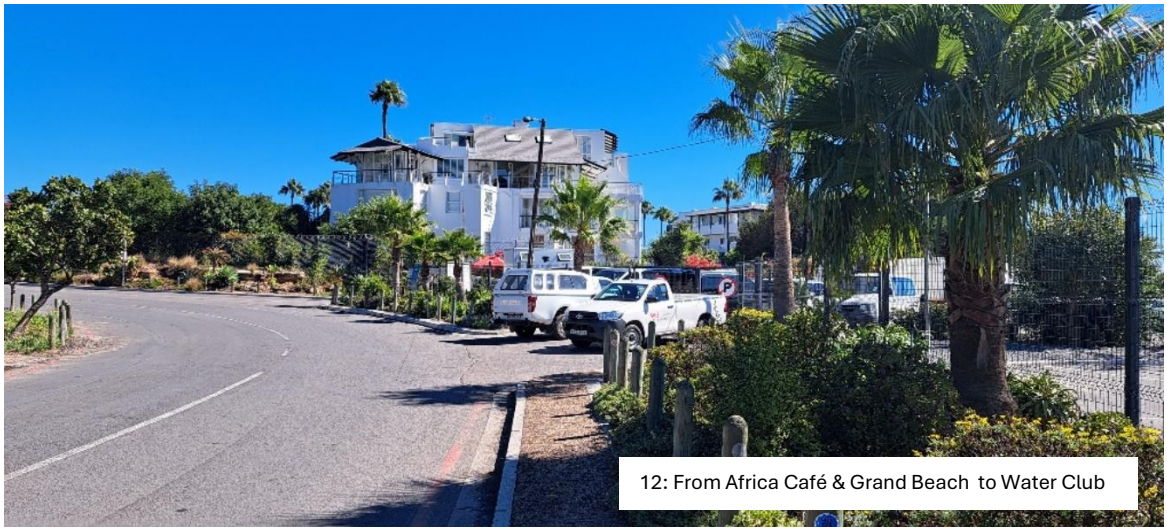
7: South, spoil banks left

8: West, Africa Café & Grand Beach in mid-ground

9: South-west alongside Africa Café & Grand Beach, right

10: South-west alongside Africa Café & Grand Beach, right

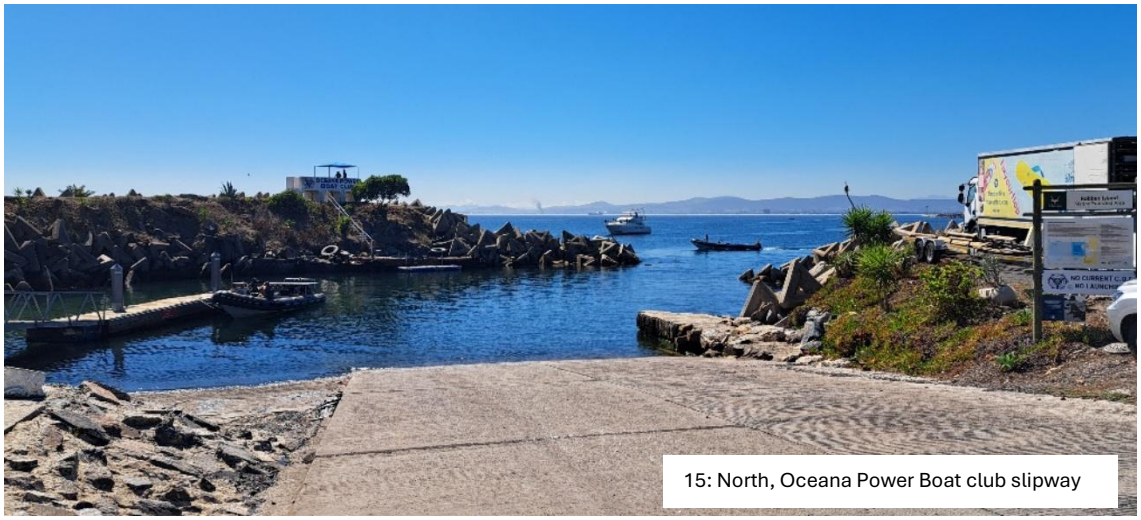
11: Africa Café & Grand Beach



12: From Africa Café & Grand Beach to Water Club

13: South towards Beach Road. Oranjezicht City Farm and Market has subsequently been moved.

14: North, entrance to Oceana Power Boat club

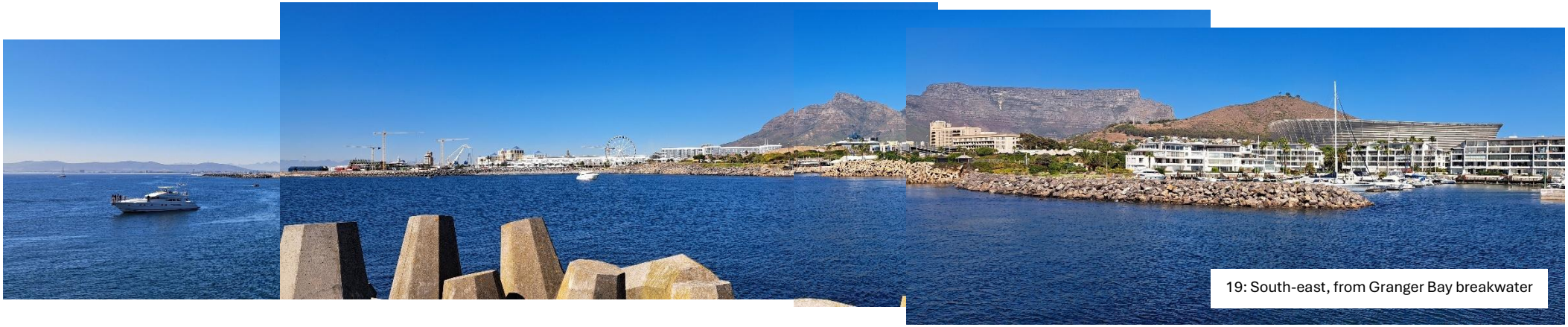


15: North, Oceana Power Boat club slipway

16: East, from Oceana Power Boat club breakwater

17: South, from Oceana Power Boat club breakwater

18: South-east, from Oceana Power Boat club breakwater



19: South-east, from Granger Bay breakwater

20: East, from Oceana Power Boat club breakwater

Figure 19: Grand Africa Café and Beach
https://www.topweddingsuppliers.co.za/grand-africa-cafe-beach-v-a-waterfront/

Figure 20: Grand Africa Café and Beach
https://www.lekkeslaap.co.za/attractions/the-grand-caf--beach

Figure 21: Grand Africa Café and Beach
https://jetsetreport.com/restaurants.php?articleId=579

Figure 22: Oceana Power Boat club slipway and club house
https://cleanthebay.co.za/listing/oceanapowerboatclub/

Figure 23: Oranjezicht City Farm market (since moved) (S Twomy)

Figure 24: Beach Road west bound from intersection with Granger Bay Boulevard, Helen Bowden Nurses Home left, demountable parking garage and site right (Google Earth).

Figure 25: Beach Road west bound, Oranjezicht City Farm and Market (OZCF) right (since moved), Fort Wynyard left (Google Earth).

Figure 26: Beach Road east bound, access to Oceana Club and OZCF Market left, Fort Wynyard right (Google Earth).

Figure 27: Beach Road west bound, Water Club right; Metropolitan golf club left (Google Earth).

9. Archaeology

Extracts from the Archaeological Impact Assessment (AIA) undertaken by TerraMare, included in full in Annexure C, are included hereunder but not directly referenced for ease of integration.

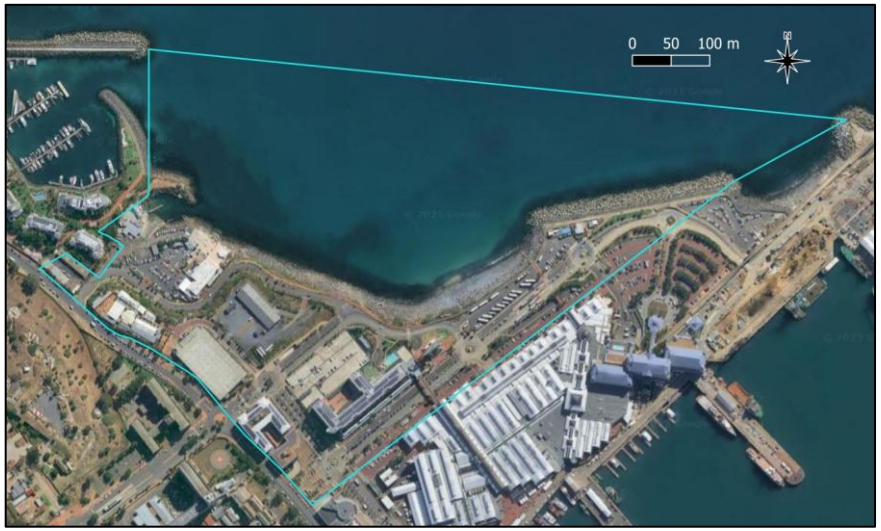


Figure 28: Study Area utilized for the AIA (Source: Google Earth).

9.1 Pre-Colonial Terrestrial Archaeology

In historical descriptions of Table Bay and its surrounds since Dias first rounded the Cape in 1497, many sailors and colonists reported the presence of indigenous people along the Cape coast, and also noted the numerous sheep and cattle possessed by some groups (Leibbrandt 1897; Thom 1952, 1954, 1958; Raven-Hart 1967, 1971). Given the abundant coastal and near-coastal resources available in the south-western Cape, precolonial occupation must have resulted in numerous archaeological sites, and Orton et al. (2020: 133), in a paper summarising the state of knowledge of the pre-colonial archaeology of the area between Table Bay and Yzerfontein, quote Laidler (1935: 566) who noted that 'the whole of the Peninsula coast, Hout Bay and Table Bay to Saldanha Bay was thickly covered with shell deposits'.

Orton et al. (2020: 133) stress that while this is an exaggeration for some parts of the coast it is certainly true that there would have been substantial pre-colonial archaeological remains on the Peninsula, and that on the shore of Table Bay much of this record has been lost to development, with only very few sites recorded prior to their destruction before the 1990s.

In the Green Point / City Bowl area, Orton et al. (2020: 135) refer to reports by Peringuey (1911) and Rudner (1968) of "extensive shell middens with associated grindstones, pottery and burials found on the western and south-western shores of Table Bay within the dunes extending from Green Point to the mouth of a stream at the lower end of present-day Adderley Street".

Orton et al. (2020: 135) also refer to an early French map of the area dated circa 1700 and reproduced in Boucher and Penn (1992) which records, "the presence of a 'Hottentot' village (village des Hotentots) at the foot of Signal Hill", while various other late 17th- and early 18th-century maps "recorded the presence of Khoe kraals to the north-west of the present City Bowl" (Glatigny et al., 2008).

In the vicinity of the V&AW, evidence of Later Stone Age (LSA) pre-colonial shell middens has been found during the excavation of the Prestwich Street Burial Ground in Green Point (Malan et al. 2017) and midden material was reported from a development site at the lower end of Buitengracht Street (Alan Morris pers. comm., 2011 quoted in Orton et al., 2020). The Prestwich site also produced a few weathered artefacts of probable Earlier Stone Age origin, and a single Middle Stone Age (MSA) artefact, a bifacial point of Still Bay type, was found at the contact of the dune sand and the underlying weathered shale bedrock. This latter artefact may indicate the presence of MSA people in the area circa 70 000 years ago (Tribolo et al. 2006; Jacobs et al. 2008 cited in Orton et al. 2020: 136).

Among the many historical archaeological burials that have been reported from the Green Point area, (see Morris 1992; Malan et al. 2017) are a few of precolonial age. Orton et al. (2020: 137) reference Sealy and Van der Merwe (1988) and Sealy (1989) who described "two such burials from Beach Road dating close to one thousand years ago and two more graves, each containing the skeletons of two individuals, were found within part of the larger Green Point historic burial ground uncovered at Cobern Street". Radiocarbon dating indicates these latter burials occurred between 1 300 and 800 BP (Cox 1999).

Although a review of archaeological reports from the V&AW conducted by Gribble (2024) found no indication that pre-colonial archaeological material has been encountered during archaeological activities within the V&AW, it is almost certain that middens and pre-colonial sites were present along this stretch of the Table Bay coast: its rocky shore, with a predictable, high-protein food supply, offering attractive focus for human use and settlement.

More than 350 years of increasingly intensive colonial and industrial utilization and transformation of the area are probably responsible for destroying much of this archaeological record, but as Orton et al. (2020: 150) point out "the scattered LSA burials and LSA occupational debris from Green Point show that some data can be obtained from heavily built-up areas" and that "while LSA sites are likely to be the most common new finds, older sites certainly lie buried beneath cover sands and calcrete strata".

This is confirmed by the finds of pre-colonial material cited from archaeological excavations within developed urban contexts in the Prestwich and Cobern Street areas, and a recent report of such material from a development site in Somerset Road (Orton, 2023). Together, this suggests that pre-colonial archaeological material could survive under the later landfill along the former coastline within the Granger Bay Land Reclamation project site, in the area indicated on Figure 29.

Given the rarity of such survivals of pre-colonial material in the developed urban context of this part of the city, the archaeological significance and value of any such sites or materials is likely to be high.

9.2 Terrestrial Historical Archaeology

Van Riebeeck's original landing site at the Cape in 1652 is described in the documents as somewhere on the "Lion's Tayle", and it has been suggested that it could have been at Granger Bay, although there is no definitive proof for this contention (Murray, 1964).

What we do know is that Granger Bay was named after a Captain Granger who lived in the Mouille Point area in the mid-19th century, and who rescued the crew and passengers of the *Miner* when it capsized off the bay in 1857 (Murray, 1964). Granger appears to have had a fishery in the area, possibly within Granger Bay itself, and there is also evidence that this small, protected bay was used historically by a whale fishery to haul their catches ashore (Archaeology Contracts Office, 1993).

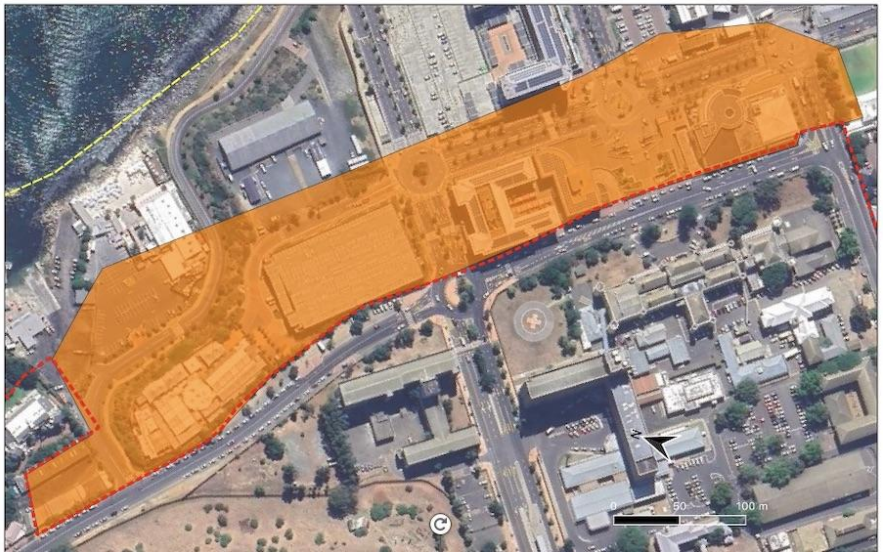


Figure 29: Rough indication of area (orange polygons) of pre-colonial archaeology sensitivity in the Beach Road precincts, which includes a portion of the Granger Bay project area, where sites or material may survive under later landfill (After: Gribble 2024). The area, between Portswood Road and GB Blvd. has been extensively excavated for existing developments.

A building indicated as belonging to the Cape Canning Company Limited, which operated out of Granger Bay in the latter half of the 19th century and early years of the 20th century, is shown on maps of the time (Figure 30), although any surviving evidence of this structure is likely to have been lost when the Water Club marina development took place. The site of the fish factory and Granger Bay itself are also both outside of the V&AW landholding.

Similarly, the historic original Dutch breakwater, or mole, for which Mouille Point is named and whose construction started in 1743, was located on the western side of Granger Bay and thus also outside the V&A. Although the sea demolished the structure almost as fast as it could be built and the structure was abandoned in 1747, the remains of the mole still survive close to where the old Mouille Point lighthouse stood (Murray 1964; Archaeology Contracts Office 1993).

Within the V&AW, a comparison of maps of the area between Granger Bay and the Breakwater, drawn in 1896 and 1911 indicates the construction of a 'blockyard' with a branch railway line from docks along the coast here (Figure 30), probably for use in the ongoing lengthening of the breakwater. This rail infrastructure is clearly visible in the 1945 aerial photograph of the area (Figure 31). The remains of this rail/harbour infrastructure seem to have been removed in 1997 and 1998 and the site cleared before being partially redeveloped. There are no extant features of archaeological significance visible on the site.

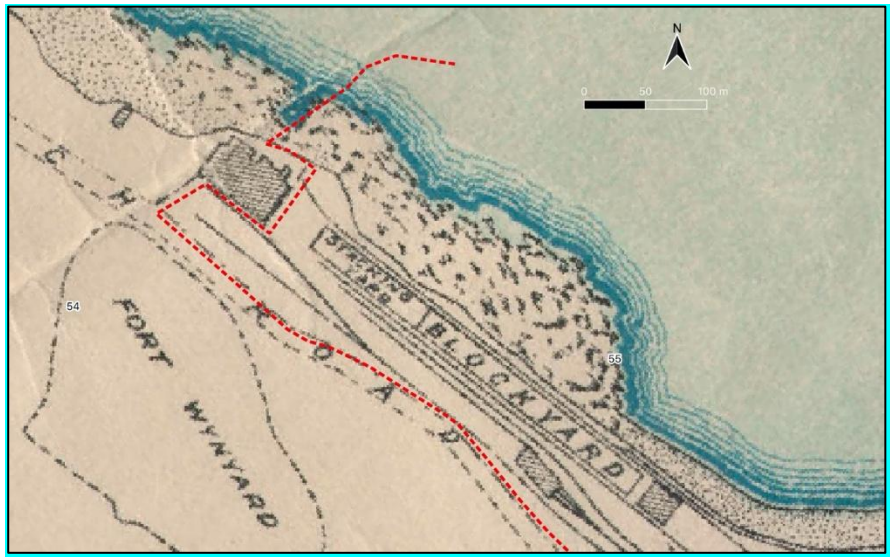


Figure 30: 1911 harbour map showing detail of the area immediately east of Granger Bay. Note the old fishery building outside the V&A boundary on the left of the image and the blockyard, stacking yard and railway line built along the seafront.

Figure 31: 1945 aerial photograph showing the block- and stacking yards on the Granger Bay coastline (Source: http://cdngiportal.co.za/photocentres/OTHER_SCALES_PAN/203A/203A_004_00616.jpg)

9.3 Submerged Prehistory

Since the start of the Quaternary, approximately 2.6 million years ago, the world has been subject to a series of cooling and warming climatic cycles and sea level was mainly lower than it is today. During the last 900,000 years, during which our tool-making ancestors were colonising much of the world, global sea levels have fluctuated substantially on at least three occasions, the result of increased and decreased polar glaciation which cyclically locked up and released huge quantities of seawater from polar ice sheets.

The most extreme recent sea level drop occurred between circa 20,000 and 17,000 years ago when, during Marine Isotope Stage 2 (MIS) at the height of the last glaciation, the sea was more than 120 m lower than it is today (Waelbroeck *et al*, 2002; Rohling *et al*, 2009). Similar sea level low stands occurred during MIS 4 (~70,000 years ago), MIS 6 (~190,000 years ago), MIS 8 (~301,000 years ago) and MIS 12 (~478,000 years ago).

Each of these low stands would have "added a large coastal plain to the South African land mass" (Van Andel, 1989:133) where parts of the continental shelf were exposed as dry land (see Cawthra *et al*, 2016) (Figure 32). The exposure of the continental shelf would have been most pronounced on the wide Agulhas Bank off the southern Cape coast, and it is estimated that a new area of land, as much as 80,000 km^2 in extent, was exposed during the successive glacial maxima (Fisher *et al*, 2010).

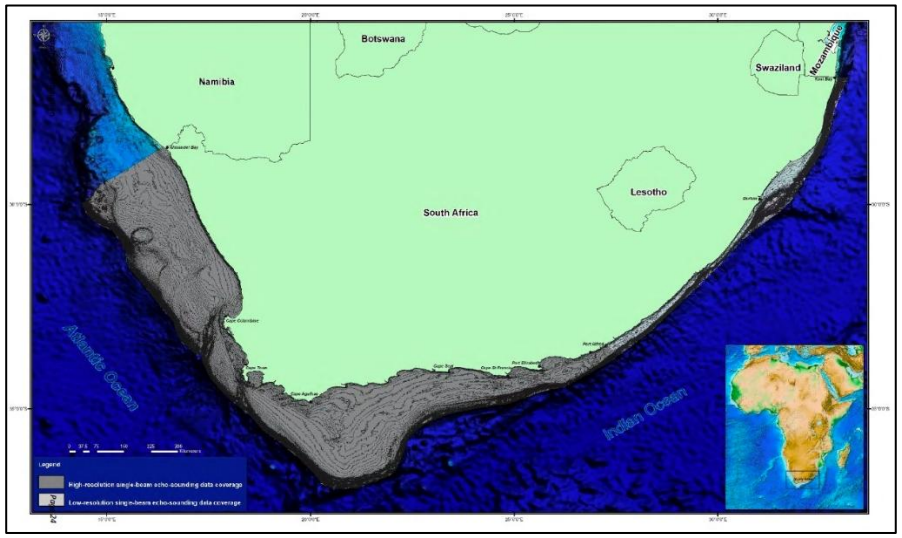


Figure 32: Extent of the South African continental shelf (light and dark grey area) (After De Wet, 2013).

The exposed continental shelf was repeatedly populated by terrestrial flora and fauna, and also by our human ancestors who were dependant on these resources (Compton, 2011), and for periods numbering in the tens of thousands of years, on at least three occasions during the last 500,000 years, covering the latter part of the

Earlier Stone Age (ESA), the MSA, and the early LSA, our ancestors inhabited areas of what is now seabed around the South African coast. This means that a large part of the archaeological record of the later ESA, MSA and early LSA is located on the continental shelf and is now "inundated and for all practical purposes absent from [that] record" (Van Andel, 1989:133-134).

Until relatively recently there was little or no global understanding of the potential for, or access to, submerged prehistoric landscapes and sites on the continental shelf. Increasingly frequent discoveries in various parts of the world of drowned, formerly terrestrial landscapes, often because of development-led seabed surveys and sampling, is, however, providing increasing evidence for the survival of prehistoric archaeological sites on and within the current seabed.

Well-known examples of such evidence include archaeological material and late Pleistocene faunal remains recovered in the nets of fishing trawlers in the North Sea between the United Kingdom and the Netherlands throughout the 20th century (Peeters *et al*, 2009; Peeters, 2011) and the University of Birmingham's archaeological interpretation of 3D seismic data, collected in the same area by the oil and gas industry, which has revealed well-preserved prehistoric landscape features across the southern North Sea (Fitch *et al*, 2005, Gaffney *et al*, 2010).

Since the University of Birmingham work there have been increasing numbers of reports of submerged archaeological sites and material, for example, Tizzard et al (2011) and Faught and Gusick (2011) in Benjamin et al (2011).

Closer to home, there is archaeological evidence for a prehistoric human presence in Table Bay. In 1995 and 1996 during the excavation of two Dutch East India Company shipwrecks, the *Oosterland* and *Waddinxveen*, divers recovered three ESA handaxes from the seabed under the wrecks (Figure 33).

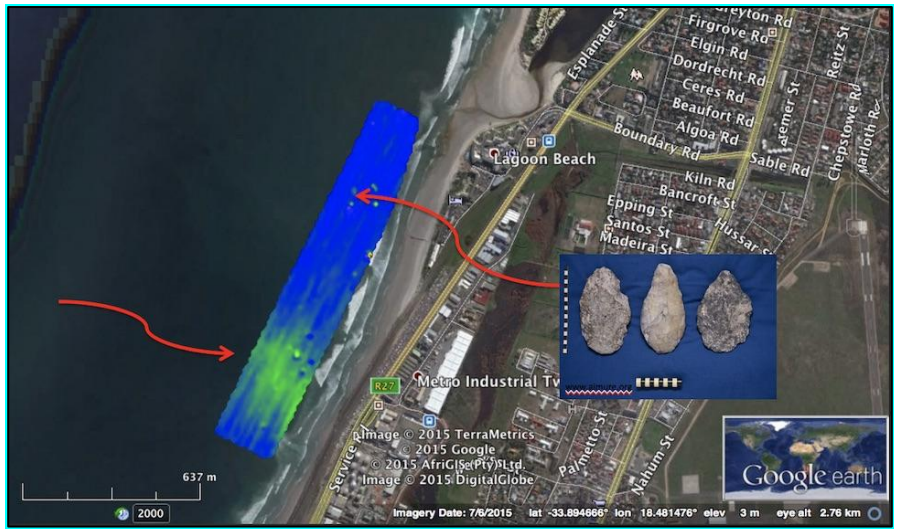


Figure 33: Location of the find of Table Bay ESA handaxes (inset) off Milnerton (top arrow) overlain on magnetometer data which shows the submerged palaeo-channel (green) of the Salt River (bottom arrow) (Sources: Google Earth; http://www.aimure.org/index.php/aimure-projects).

The stone tools, which are between 300,000 and 1.4 million years old, were found at a depth of 7-8 m below mean sea level and were associated with Pleistocene sediments from an ancient submerged and infilled river channel. Their unrolled and unworn condition indicate that they had not been carried to their current position by the ancient river and suggests that they were found more or less where they were dropped by ESA hominins more than 300,000 years ago (possibly during MIS 8 (~301,000 years ago) or MIS 12 (~478,000 years ago)), when the sea level was at least 10 m lower than it is today and much of Table Bay was an emergent terrestrial landscape (Werz and Flemming, 2001; Werz *et al*, 2014).

During periods of lower sea level our ancestors are likely to have moved out onto the exposed floor of Table Bay and left evidence of

their use of that landscape. Where landscape features and formerly sub-aerial sediments have survived subsequent marine transgressions there is, thus, the potential to find pre-colonial archaeological sites and artefacts, and to recover paleoenvironmental data (pollens, foraminifera and diatoms, for example) from submerged, seabed contexts within Table Bay.

9.4 Maritime Archaeology

In 1498 the Portuguese explorer Vasco da Gama finally pioneered the long-sought sea route around Africa from Europe to the East. Since then, the southern tip of the African continent has played a vital role in global economic and maritime affairs, and until the opening of the Suez Canal in 1869, represented the most viable route between Europe and the markets of the East as shown on Figure 34 (Axelson, 1973; Turner, 1988; Gribble, 2002; Gribble and Sharfman, 2013).

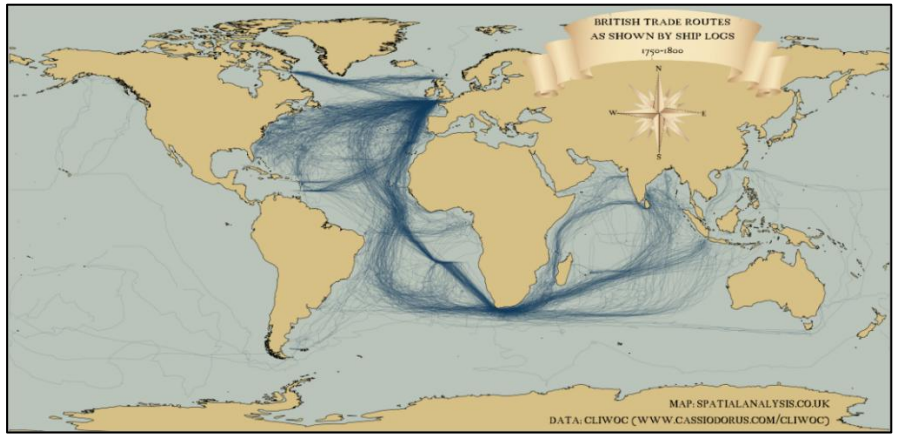


Figure 34: Example of the strategic position of the South African coast in global trade. British trade routes as shown by ship logs – 1750 to 1800 (Source: http://www.theguardian.com/news/datablog/2012/apr/13/shipping-routes-history-map).

The geographical position of the South African coast on the historical route to the East and the physical conditions mariners could expect to encounter in these waters have, in the last five centuries, been responsible for the large number of maritime casualties which today form the bulk of South Africa's maritime and underwater cultural heritage (Gribble, 2002).

At least 2,800 vessels are known to have sunk, or been wrecked, abandoned or scuttled in South African waters since the early 1500s. This list of casualties is not believed to be complete and certainly does not include the yet unproven potential for shipwrecks and other sites that relate to pre-European, Indian Ocean maritime exploration, trade and interactions along the South African east coast.

For obvious historical reasons, the earliest known South African wrecks are Portuguese, dating to the sixteenth century when that country held sway over the route to the East. Due to the later, more prolonged ascendancy of first the Dutch and then the British in European trade with the East and control at the Cape, most wrecks along the South African coast are Dutch and British. However, at least 36 other nationalities are represented amongst the other wrecks that litter the coast.

South Africa's historical shipwrecks record is, thus, a huge, cosmopolitan repository of information about mainly global maritime trade during the last five centuries and potentially much further back into the past. These sites contain a wealth of cultural material associated with that trade and clues to the political, economic, social and cultural changes that accompanied this trade, and which contributed to the creation of the modern world.

The historical anchorage in Table Bay has the largest concentration of historical wrecks in South African waters (more than 400). This is the result of a combination of factors, including a notorious lee shore to the Western Cape's winter storms, the long history of the bay as busy

shipping hub, and indifferent harbour facilities for most of that period (Burman, 1976; Turner, 1988).

Unlike the southern and eastern shores of Table Bay where the bulk of historical shipping casualties occurred, however, the north-western portion of the bay, where the Granger Bay project will be situated, was relatively protected from the winter north-westerlies, and shipwrecks were less common in this area.

Nevertheless, several texts (see Burman, 1976; Turner, 1988; Durden, 1992) and a shipwreck database maintained by TerraMare Archaeology, indicate that more than 20 shipwrecks or shipping losses occurred in the area between the Green and Mouille Points between the 16th and 19th centuries. Table lists the recorded wrecks around in the Mouille Point area.

Table 2: List of historical wrecks recorded in the vicinity of the project area

Name	Date	Place
Apollo	1823	Ran ashore at Green Point close to the Moulin Battery
Arabia	1858	Struck rocks and wrecked at Mouille Point
Athens	1865	Wrecked on the rocks between Green Point and Mouille Point
Catherine Jamieson	1840	Ran aground on rocks at Mouille Point
Chieftan	1848	Wrecked on Mouille Point
Dido	1853	Wrecked on rocks at Mouille Point
Eliza	1863	Ran aground on rocks at Mouille Point
Ellen Maria	1868	Wrecked on the rocks at Green Point
Enchantress	1849	Wrecked between Green Point and Mouillle Point
Frances	1840	Ran ashore at Mouille Point
Helen / "Glass Wreck"	1842	Ran ashore at Mouille Point
Highfields	1902	Sank after collision with the *Kaiser* just outside the Breakwater
Hoop	1784	Ran ashore close to Mouille Point
Juliana	1839	Ran ashore at Mouille Point
Mary Stewart	1842	Went ashore between the lighthouses
Miner	1857	Capsized off Granger Bay
Mulgrave Castle	1825	Driven onshore and wrecked close to Green Point lighthouse
Olga R	1885	Ran aground on the reef at the point
Palmer	1840	Ran aground on rocks between the lighthouse and Moulin Battery
Piscatatqua	1865	Ran ashore opposite the wreck of the *Athens*
Prince Rupert	1841	Ran ashore at Mouille Point
Reno	1883	Ran aground at Mouille Point
Royal William	1837	Struck rocks at Green Point near Lazar's Fisheries
Sheperd	1874	Foundered on north side of Breakwater
Sincapore	1832	Ran ashore at Mouille Point
Swea	1852	Ran ashore near the "old" lighthouse
Udeny Castle	1840	Ran ashore at Mouille Point
Wasp	1863	Capsized outside the Breakwater

Some of these wrecks – for example the *Athens*, the *Highfields* and the *Helen* (also known as the Glass Wreck) - can confidently be placed outside the study area because their remains have been found on the seabed and their positions are thus accurately known. The *Wasp* (1863) and *Sheperd* (1874) were lost slightly offshore near the Breakwater, and it seems unlikely that their remains will be within the area proposed for shore protection and associated land reclamation between the existing revetment and Granger Bay.

The records suggest that only one of these casualties took place within Granger Bay itself – the *Miner* which capsized and sank in 1857 - but the vagueness of contemporary historical descriptions and the closeness of Mouille Point to the project area, suggests that it would be wise to consider the possibility that at least some of the vessels listed in Table 2 as having been lost within the project area.

It is worth noting in this regard that the 1926 aerial photograph on the City of Cape Town Map Viewer shows what appears to be a vessel

on the beach in the corner between the Breakwater and Granger, more or less under what is now Breakwater Lane (Figure). Although this lies outside the project area, it is a reminder that there is the potential for unknown wrecks to be present in the project area.

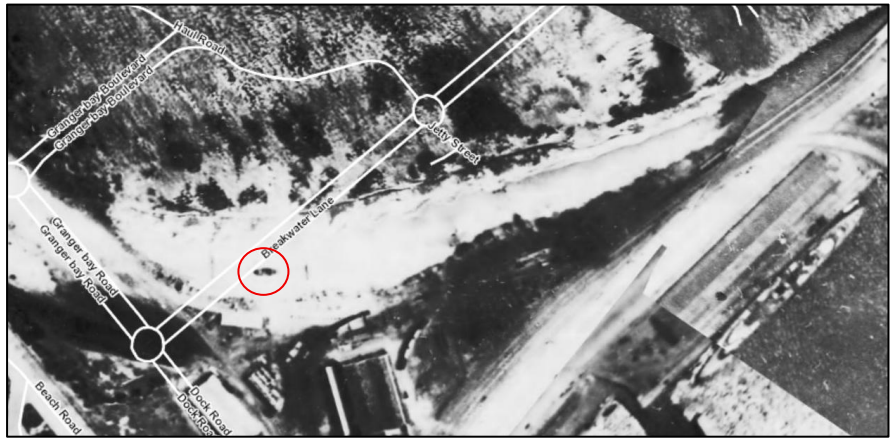


Figure 35: 1926 aerial photograph showing a possible wreck (circled) on the beach between the Breakwater and Granger Bay (Source: (https://citymaps.capetown.gov.za/EGISViewer/).

10. Visual analysis

Extracts from the Visual Impact Assessment undertaken by MALA, included in full in Annexure D, are included hereunder but not directly referenced for ease of integration.

The waterfront position of the site, wedged between the V&A Waterfront, Fort Wynyard and the Water Club, provides its visual significance. Added to this is the importance of the view cone from Fort Wynyard with its so-called 'arc of fire' across Table Bay. 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 New Somerset Hospital and its forecourt to the southeast of the site is a Provincial Heritage Site.

Beach Road is a S2 Scenic Link road between Sea Point and the V&AW (Scenic Drive Network Management Plan) 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. 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. Views are currently limited to the Haul Road and Granger Bay Boulevard corridors with topography, vegetation and buildings in between these two corridors obstructing views north to the coastline and Table Bay.

Figure 36: Neighbouring The Water Club and The Radisson Hotel to the west of the site (MALA)

Figure 37: View from Fort Wynyard, across the Granger Bay site towards Table Bay and Blouberg (MALA)

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.

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.

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.

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.

Figure 38: Viewshed of the proposed Granger Bay Precinct Development, dictated primarily by topography (MALA)

Figure 39: ZVI of the proposed Granger Bay Precinct Development, dictated by development (MALA)

The highly sensitive visual 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.

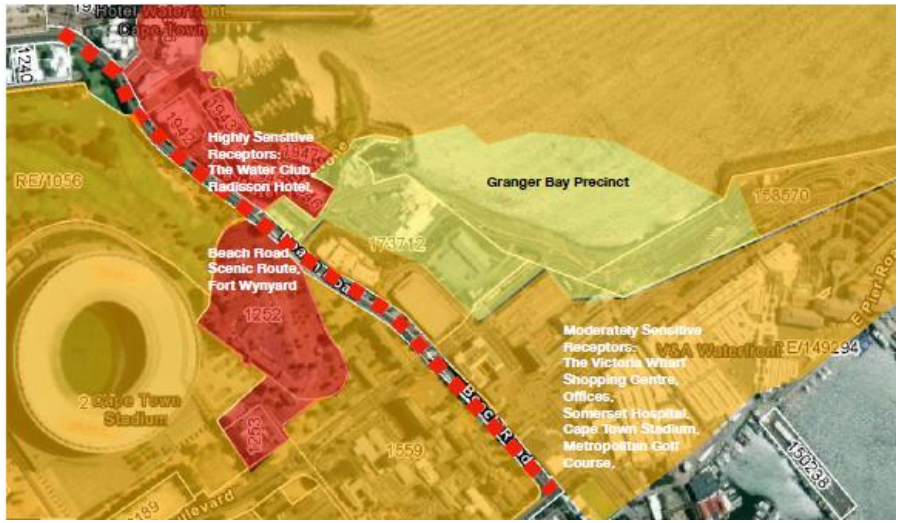


Figure 40: Receptors of the proposed development

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.

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

11. Heritage Resources & significance

The NHRA gives legal definition to the range and extent of what are considered to be South Africa's heritage resources. According to Section 2(xvi) of the Act a heritage resource is "any place or object of cultural significance". This means that the object or place has aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance.

Establishing and grading for heritage significance is based on the three-tier grading system used in the NHRA and HWC's "Grading Implications & Management of HR HWC guidelines April 2016" (Annexure E).

Site

There are few structures on the site and all are temporary, located in an ad hoc manner. It should be noted that the site is at present severely degraded, essentially owing to shore protection measures and extensive temporary spoil dumping. It is around 50% reclaimed land and the site itself thus has **low intrinsic heritage significance**.

The primary character component of any significance present is the spatial and visual contact with the water's edge **(IIIA)**. In respect of the public access to the water's edge, the coastal pedestrian walkway and boardwalk runs for almost the entire length of the V&AW Granger Bay landholding on its northern coastal edge, but is interrupted by the restrictions of the slipway operation and the Grand Cafe & Beach development.

The nature of public access to the water's edge, particularly in the form of the **slipway and the association** with the "snoek run", has socio-historical significance, although it must be noted that this is not currently general public pedestrian access, but access to launch boats. The Oceana Power Boat Club buildings are temporary or contemporary. The club is located on the site of a fishery that has its roots in the 18th century. There is some speculation that this fishery may have been a whaling station. Throughout the 19th century the site is indicated on maps as a fishery or fish canning company.

For an extensive and continuous period the slipway has operated as a launching site for small boats related to recreational craft, as well as, now to a lesser extent, subsistence and commercial fishermen. The slipway is one of the very few safe entry points into Table Bay for small boats and for the general public. Many of the fishermen who originally used the slipway belonged to communities who were forcibly removed from Cape Town (District 6, Sea Point) during the Apartheid years and had a long-standing tradition of using the facility to launch their boats. Access to the slipway is regarded as being of high significance to these users **(IIIC).**

The **Grand Africa Café and Beach** is partly located in two corrugated iron warehouse structures extended by way of temporary structures. They are contemporary and, contrary to the CCT heritage audit, it is proposed these have no intrinsic nor socio-historical significance and should be graded **Not Conservation Worthy**.

Heritage resources in the immediate vicinity are located off site (in particular Fort Wynyard) but have some key implications for future development opportunities in Granger Bay.

Fort Wynyard

Fort Wynyard is a fully operational SANDF site and occupied as Regimental HQ by Autshumato Anti-Aircraft formerly Cape Garrison Artillery. They have a kitchen which supplies daily meals to some 50 troops at Fort Wynyard and at Erf 81 in Tamboerskloof where they are doing guard duty. Vineyards have been planted with the support of De Grendel through the De Villiers family which are now flourishing, and should produce a small yield this year. Shortly De Grendel will plant 1,2 hectares of vines facing the golf course and, on the banks, facing the ocean vegetable gardens will be planted. This will then beautify the entire area down to the fence. They are currently raising

funds to re furbish the Gun's via donor funding as well as through the Gunners' Association

Fort Wynyard was declared a National Monument in 1976, now deemed a Provincial Heritage Site **(PHS)**. The heritage significance of the fort is tied to its strategic defence position at the entrance to Table Bay, and its ability to cover in its arc or fire the approach from Robben Island and the opposite shoreline where the suburbs of Blouberg and Table View are now located. The laboratory and magazine, constructed in 1812, and declared as a PHS in 1993 is regarded as an integral part of the site. Significance lies in:

- *High international and national historical/military technological significance*. The Fort is unique as a Victorian coastal defence battery in terms of its content, layout and context, as well as its degree of intactness. Three pre-dreadnought period naval guns are in their original positions with much of their original mechanism still extant. The 9.2" disappearing gun mounting is the only one of its kind still surviving in Africa and one of a few remaining examples in the world. The Fort represents an unbroken line of evolution of gun emplacements on this strategic position and active military occupation from 1795 to 1956.
- *High local landmark status*
  The Fort is situated on a prominent calcrete dune which during the 18th, 19th and early 20th centuries contributed to its strategic landmark position. It would have been visible from the Green Point Common, the Portswood area including the Somerset Hospital site and from the ocean.

  This context has changed with the extensions to the Somerset Hospital and has been dramatically altered by the construction of the Cape Town Stadium immediately to the southwest of the Fort. While this context has undergone considerable change, of key importance is the relationship of the Fort to the shoreline and retention of significant sea views/view planes as discussed earlier.
- *High national educational significance*
  The site has high national, regional and local military history significance as a coastal artillery battery and open air museum. Fort Wynyard is the only complete Victorian battery with its guns intact. The complete and intact fortification has much education and tourism value which is currently undervalued and unrealised.
- *High national and local aesthetic/architectural significance*. The Fort is a rare and good example of a Victorian defence system. It is an excellent example of engineering and the extensive use of local stone construction of ramparts and underground chambers. The joinery and fittings are still intact.
- *High associational/group value*
  The Fort is significant as part of a system of coastal defences spanning nearly three centuries. In the immediate context of the V&AW there are linkages with the Amsterdam and Chavonnes batteries. During the nineteenth century the Fort's counterpart would have been Craig's Battery, now demolished, at the mouth of the Salt River. During the Second World War, Fort Wynyard was closely linked with the gun batteries at Simon's Town, Llandudno, Robben Island and Gordon's Bay and formed a critical component in the general network of coastal defences and communications.

Maritime & Archaeological Significance

In terms of the definitions provided in Section 2 of the NHRA, heritage resources potentially relevant to this archaeological assessment are:

- Material remains of human activity which are in a state of disuse and are in or on land [which includes land under water] and which are older than 100 years, including artefacts, human and hominid remains and artificial features;
- Rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or

stone, which was executed by human agency and which is older than 100 years; and

- Any archaeological artefact, which as movable property of cultural significance may be protected in terms of any provisions of the NHRA.

Visual significance

The waterfront position of the site, wedged between the V&A Waterfront, Fort Wynyard and the Water Club, provides its visual significance. Added to this is the importance of the view cone from Fort Wynyard with its so-called 'arc of fire' across Table Bay. Beyond this, there is little positive sense of place.

The site however 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

Heritage sites in the local context.

There are a large number of sites in the local context, of provincial and local heritage significance, which together constitute a mid-19th century cultural landscape of considerable heritage significance. They include:

- The Somerset Hospital (PHS) (1860) and its forecourt.
- The complex of buildings including the City Hospital along Portswood Road which reflect the role of the site in health care during the latter half of the 19th century.
- The Green Point Common PHS.
- The Victoria and Alfred Basins and associated maritime buildings including the Convict Station and Industrial Breakwater Prison on Portswood Road which functioned during the latter half of the 19th century and which reflect significant trends such as the use of convict labour in harbour construction.
- City scale views to the coastline from Signal Hill and local views along Beach Road.

The Granger Bay site forms part of this broader cultural landscape, which assessment of potential impacts of the proposal needs to take into consideration. However, it is also noted that aside from the area within the Arc of Fire determination (and so is identified as a Buffer Area in terms of the area identification of the Draft V&AW CMP), and the coastline, the remainder of Granger Bay is designated as Peripheral, with **limited**, if any heritage related significance.

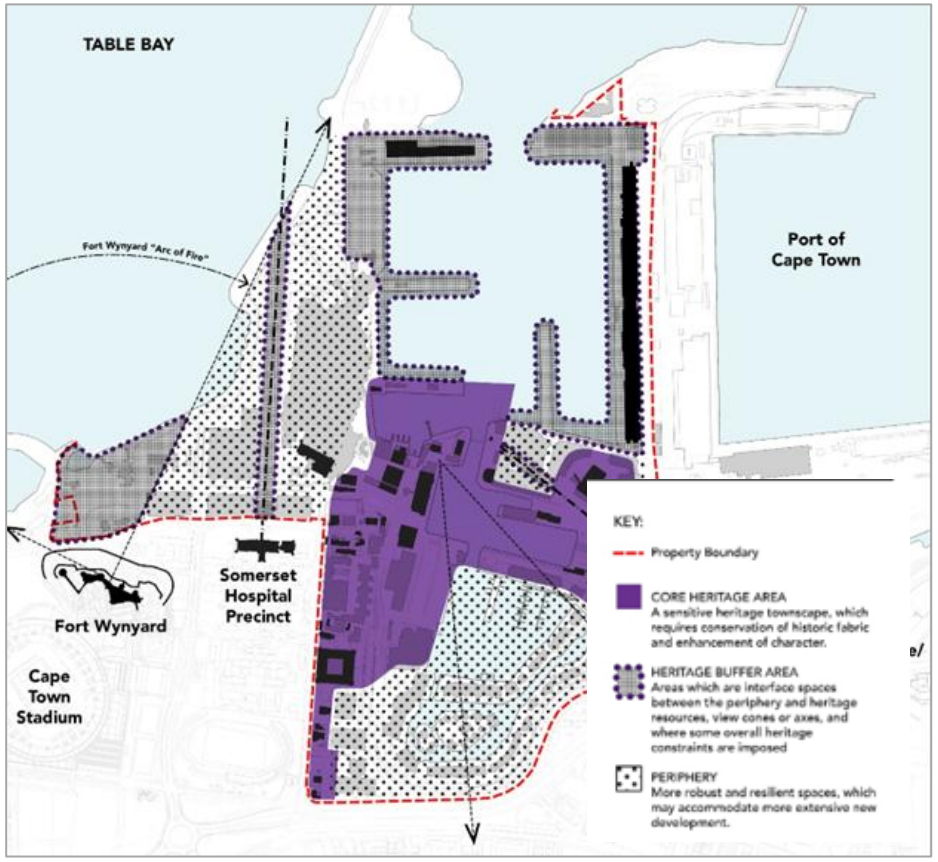


Figure 41: V&A CMP Heritage Inventory Area Identification

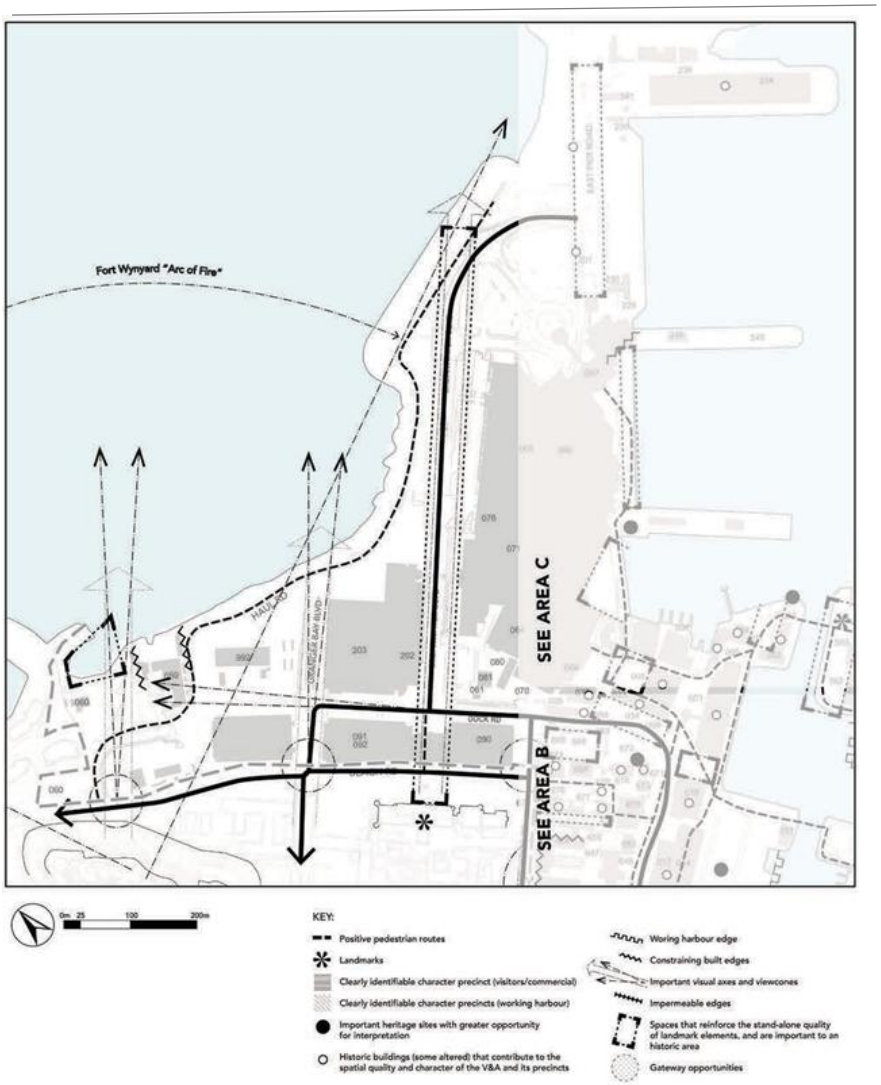


Figure 42: Granger Bay analysis of elements contributing to place character (V&AW CMP)

12. Heritage Design Informants

The heritage indicators have been extracted from the endorsed Baumann 2015 HIA, and updated as pertinent; the 2024 V&AW Draft Conservation Management Plan (CMP - in process at HWC); and the approved 2024 Mixed Use Rezoning HIA

Heritage issues are focussed on the following (Figure 43):

- The concentration of heritage resources in the immediate context, including the Somerset Hospital.
- The historical public access to the shoreline at Granger Bay.
- The retention of sight lines from Fort Wynyard across Table Bay.
- The location of possible shipwrecks.

Fort Wynyard site lines

1. The preservation of view cones and sight lines from Fort Wynyard across Table Bay to the coastline in the vicinity of Tableview and Blouberg. These view cones have been surveyed, approved and are indicated on Figures 79 & 8. The view cones are based on the sight lines from the three major gun emplacements of Fort Wynyard, viz the 6" guns and the 9.2" disappearing gun across Table Bay. Roof heights in the "arc of fire" are to be kept to 21.5m above the mean sea level (MSL) which accommodates the "declination to the horizon". Structures on the roofs of these buildings must be included in these height restrictions.
2. A 30m wide view corridor which will provide a sight line to the water's edge from the large gun emplacements at Fort Wynyard should be provided to link the Fort to the shoreline. This would also contribute to breaking up the potentially monolithic massing of any development along Beach Road. Buildings on either side of this corridor must be staggered to open up the corridor. The top two floors on either side of the corridor must be set back behind the envelope established by the approved Beach Road development .
3. The top floor of buildings flanking the view corridor of the main gun placement of Fort Wynyard must have a different

architectural treatment, which must be lighter and more fragmented in form and set back from the main structure.

General site lines

4. The visual connection to Signal Hill, Table Mountain and Devils Peak need to be provided for, both from on site and for neighbours such as The Radisson Hotel.
5. Views of Table Bay, Table Mountain and Signal Hill from Fort Wynyard, Somerset Hospital and Beach Road need to be taken into account in any proposed development.
6. Views of Table Mountain and Signal Hill from the Coastal Walkway should be considered;
7. Visual intrusion on the Coastal Walkway should be considered, namely sufficient set back of buildings and tapered upper floors;
8. The view of the Atlantic Ocean along Granger Bay should not be obstructed nor intruded upon

Access to the slipway

9. Public access to the waters edge via the 30m view corridor must not be impaired in any way. This includes access for fishing boats under the management system for the new slipway to ensure that access for the fishing community are ensured.

Public pedestrian access to the shoreline

10. The visual connection to the sea is seen as a high priority to maintain important vistas and sightlines across Table Bay. This includes views from Beach Road where the wall-effect of buildings needs to be minimised, as well as the proposed view corridors in front of Fort Wynyard and down Granger Bay Boulevard. Views of the near shoreline, as well as the Bay are important, and any building development needs to allow for visual permeability to the sea.
11. Public pedestrian access from Beach Road to the shoreline should be clearly indicated and the nature of the linkage and integration between the Sea Point - Mouille Point Promenade into the V&AW precinct along the water's edge to connect the Victoria Wharf and the breakwater, carefully designed. This should be conceived as a major new amenity for the citizens of Cape Town. The route should accommodate the 30m view corridor from Fort Wynyard to the sea as referred to above and should be appropriately landscaped. The continuity of this coastal corridor must be ensured for public access and visual amenity (views of mountain and sea). (Unfortunately this corridor has already been compromised by the Water Club to the west). The effect of an impervious walled and gated community needs to be minimised by having public and retail facilities along the edges, particularly along Beach Road and the coastal promenade.

Contextual informants

12. Sense of place needs to be enhanced through emphasis on human-scaled outdoor spaces and routes, and through landscape design. Continuity with the V&A precincts needs to be considered in the design.
13. The development needs to be seen also as a visitor and tourism destination and not only as a private residential estate as in the case of the Water Club. A visually lively and inviting 'coastal park' promenade, with retail and eating facilities, could contribute to this ideal.
14. Along the coastal zone in the vicinity of Somerset Hospital and Portswood Ridge there has been a relative consistency in terms of urban form and massing and relatively fine grain urban development. To the north, the apartment blocks on the land side of Beach Road reveal a much broader grain form of development but with substantial gaps between structures. Monolithic, homogenous massing on the sea side of Beach Road should thus be avoided. Attention should be paid to modulating facade treatment and roofscapes, possibly in response to different land use activities, to contribute to an appropriate scale along the route. The form and massing of

buildings should be fragmented in nature to create a degree of visual permeability.

15. Gaps between buildings must be established to enable a degree of visual permeability and to maximise potential sea views from Beach Road as provided for in the approved Granger Bay Phase 1 Precinct Plan.
16. Given its identification as a peripheral area outside of the "arc of fire", taller buildings are permitted on the corner of Beach Road and Granger Bay Boulevard (opposite the old Helen Bowden Nurses Home). The importance of sea views from Beach Road and the views towards the mountain should be considered as one of the parameters defining height and massing along Beach Road.

Archaeology

17. Before construction starts a physical survey must be carried out by a qualified marine archaeologist to verify if any remains of a wreck are observed on the sea bed. If any wreck is found, it must be identified, recorded and documented and, depending on the significance, it must either be removed (if significant) or back filed under the new development after documentation. Shipwrecks are protected under the NHRA and a permit for their excavation is required to be obtained from the SAHRA Maritime Unit if any wreck would have to be disturbed.

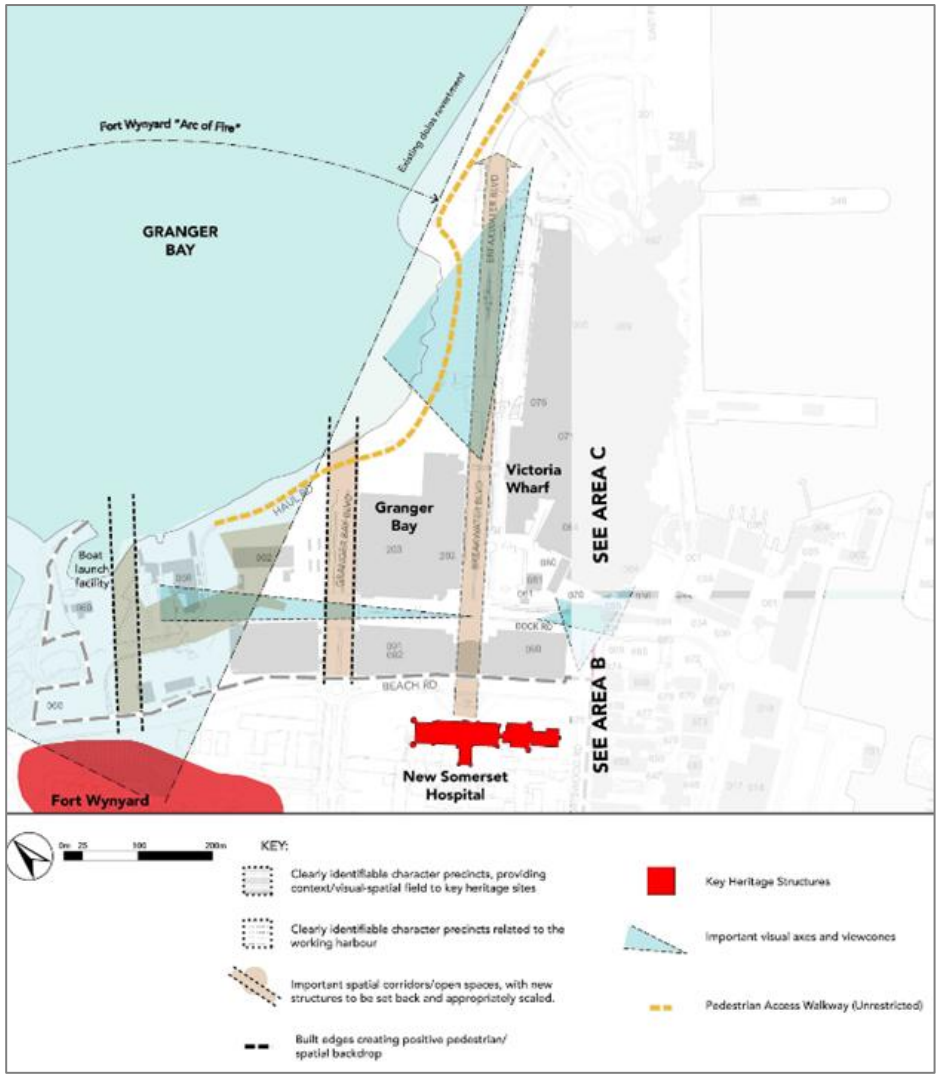


Figure 43: Key Heritage Indicators Granger Bay (V&AW CMP)

13. Development Proposal

The current layout for the Proposed Development of the Granger Bay Precinct and Reclamation of Land at the V&A Waterfront is included in full in Annexure F. It includes a Notional Precinct Development Plan, Urban Design Guidelines, and Granger Bay Phase 2 Development Controls.

2019 Approved Granger Bay Precinct Reclamation Scheme (not to be implemented)

In 2019 a straight-line reclamation scheme was approved by DEA&DP for the same study area. The V&AW have not pursued this scheme, but it has been included for comparative purposes.

The approved development comprised two main components as follows:

- Mixed use (primarily residential with some retail and commercial use) development of Erf 173712, portion of Erf 149294 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

Development rights for a portion of the Granger Bay precinct (landward of the 100m setback line from the High-Water Mark) were approved in March 2014. This development is not subject to the current EIA process. The remaining portion (seaward of the 100m setback line from the High-Water Mark) was the site of a proposed coastal walkway, residential, retail and commercial development including a possible new closed (i.e. not open to the sea) water feature / canal. The proposed new water feature would have covered an area of approximately 0.8 Ha and would be created through extensive excavation of the site. If not developed as a water feature, the space provided was to remain and become private open space. Different types of accommodation were considered and included hotels, serviced apartments and private apartments, all of which were to be constructed in the surrounding area. Adjacent to the proposed coastal walkway/sea park (created as a result of the reclamation), provision was to be made for some restaurants and limited retail. The total land area for development packages within the application site amounted to approximately 1.6 Ha (i.e. 25% of the total land parcel).

The architecture of buildings was to respond to the coastal setting and the desire to maximise outward views to the sea. In these buildings, large outdoor terraces were envisaged. Building heights were to be in accordance with parameters established in terms of the Heritage approval issued in 2011 which preserved a view arc across Granger Bay. Within the view arc, no buildings would be higher than 21,5m or approximately 5 floors. Outside the view arc, towards the Beach Road/ Granger Bay Boulevard Ext. corner, building heights could be higher.

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 was to 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 would be replaced with a rock revetment for a length of approximately 160m. The total combined length of new revetment was therefore be approximately 470m. This coastal infrastructure would provide the required protection for the proposed mixed use development in the precinct, the existing infrastructure on Erf 149294 (e.g. parking structures and Breakwater Boulevard) and enable an appropriate response to the heritage and development informants for the Granger Bay precinct.

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, was to 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 for approximately 750m of which approximately 300m would be within the Granger Bay Precinct.

This coastal route would consist of a paved pedestrian walkway. Outdoor leisure and recreational facilities would be located along this route.

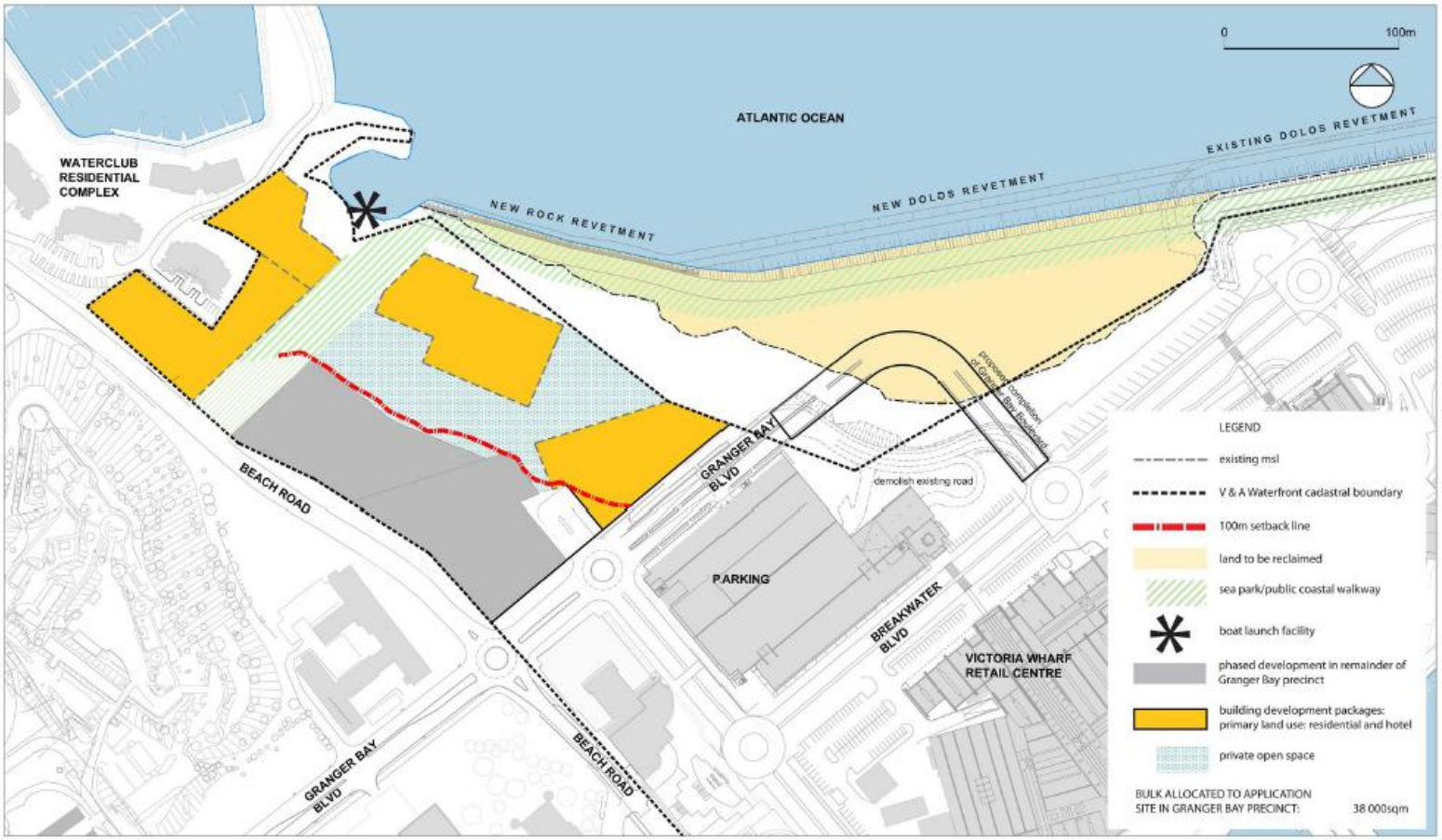


Figure 44: 2019 approved Dolos revetment with land reclamation

Proposed current Granger Bay Precinct Reclamation Scheme

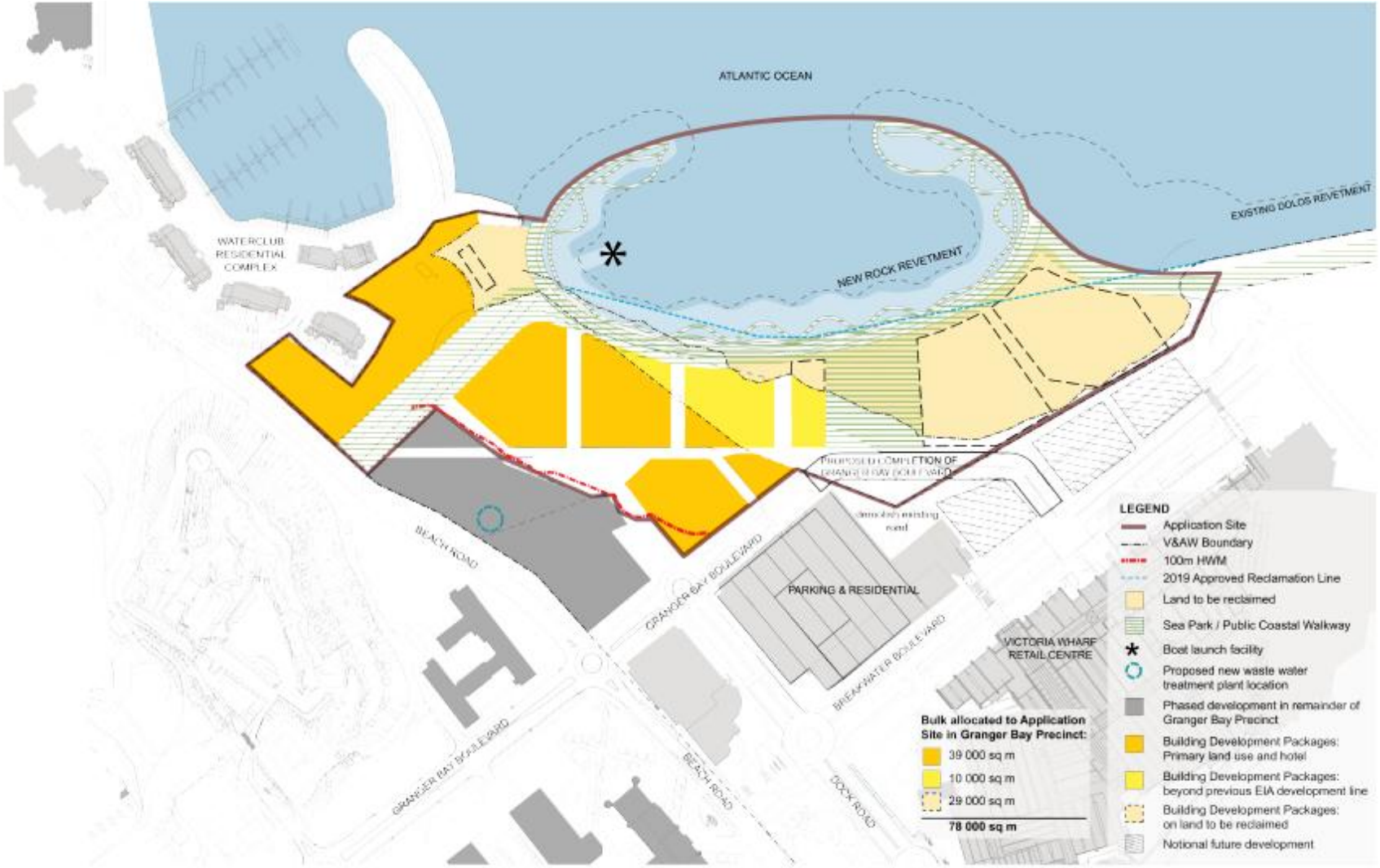


Figure 45: Current layout for the Proposed Development of the Granger Bay Precinct and Reclamation of Land at the V&A Waterfront

Figure 46: Preferred alternative (Infinity)

The proposed revised development at Granger Bay comprises two main components as follows:

- Replacement of coastal defence structures: associated revetment, breakwaters, and Land Reclamation.
- Revised mixed use development packages.

Adjacent Mixed-Use Development (not part of EIA)
Development rights for a portion of the Granger Bay precinct (landward of the 100m setback line from the High-Water Mark on Erf 173712, portion of Erf 149294 Cape Town (also referred to as the Granger Bay precinct) were approved in March 2014. This development is not subject to the 2018 or current EIA process and is provided for contextual relevance, shown in grey in Figure 46. This area is located outside the EIA project area (indicated in red).

Replacement of coastal defence structures and coastal public access:
The remaining portion (seaward of the 100m setback line from the High-Water Mark) is the site defined by a coastal amenity zone and two breakwaters. The breakwaters and new rock revetment will protect the public coastal amenity zone of approximately 57 000m^2, that will include a:

- An approximately 30 000m^2 **bay area** for water-based activities such as boat launching, leisure craft, sailing, kayaking, swimming, sailing.
- A **coastal park** (public amenity) on the land side.

The coastal park will inter alia comprise a slipway, fixed quayside, landscape promenade, tidal pools, pedestrian paths and open areas.

As a replacement for the existing unprotected embankment and gravel beach, a permanent rock revetment and two breakwaters will be established to ensure shoreline protection, as well as providing shelter for portions of the site from storm action. These improvements are necessary as the existing gravel beach and unprotected embankment are not adequate to provide the necessary shore protection for long term development and infrastructure development of the site.

Mixed Use Development:
A backdrop of low to medium-rise mixed-use development is proposed to frame this coastal amenity. This will comprise residential, hotels, leisure, and some commercial development; the layout is intended to promote uses and activities that could take advantage of the ocean location of the site. The types of residential accommodation being considered include hotels, serviced apartments, and private apartments.

The total bulk assigned to these land uses is 78 000m^2 on 7.4 ha of land.

The orientation of development blocks and streets as well as the massing of buildings will respond to the coastal setting and maximise outward views of the ocean. In these buildings, large outdoor terraces are envisaged. Building heights will be in accordance with parameters established in terms of the heritage approval issued in 2011 which preserves a view arc across Granger Bay. Within the view arc, no buildings will be higher than 21,5m or approximately 5 floors. Outside the view arc, towards the intersection of Beach Road and Granger Bay Boulevard, building heights may step up.

Key Changes
The key change from the 2019 EIA approval is the **reshaping** of the proposed revetment, the inclusion of **two ('east' and 'west') breakwaters** and the inclusion of **public amenities** within shoreline protection infrastructure. Certain development packages will also be reshaped.

The **reshaped revetment will be 540m long**, the west breakwater approximately 90m and the east breakwater approximately 140m.

This coastal infrastructure will provide the required protection for the proposed mixed-use development in the precinct as well as the existing infrastructure on Erf 149294 (e.g. parking structures and Breakwater Boulevard) and enable an appropriate response to the heritage and development informants for the Granger Bay precinct.

In addition, this coastal protection will include a **coastal public walkway** that will connect to the Mouille Point promenade via Beach Road and provide continuous public access from Beach Road to and along the coast. The coastal route will consist of a paved pedestrian walkway including outdoor leisure and recreational facilities. The extended 540m coastal walk within the application site will be supplemented by approximately **100m public pedestrian paths** along each breakwater.

Approximately 3.0ha of land will be reclaimed, of which approximately 1,5ha will comprise public amenities and open spaces and 1,5 ha will be utilised for mixed use development parcels. It is noted that the two breakwaters comprise an **area of a further 0,8Ha.**

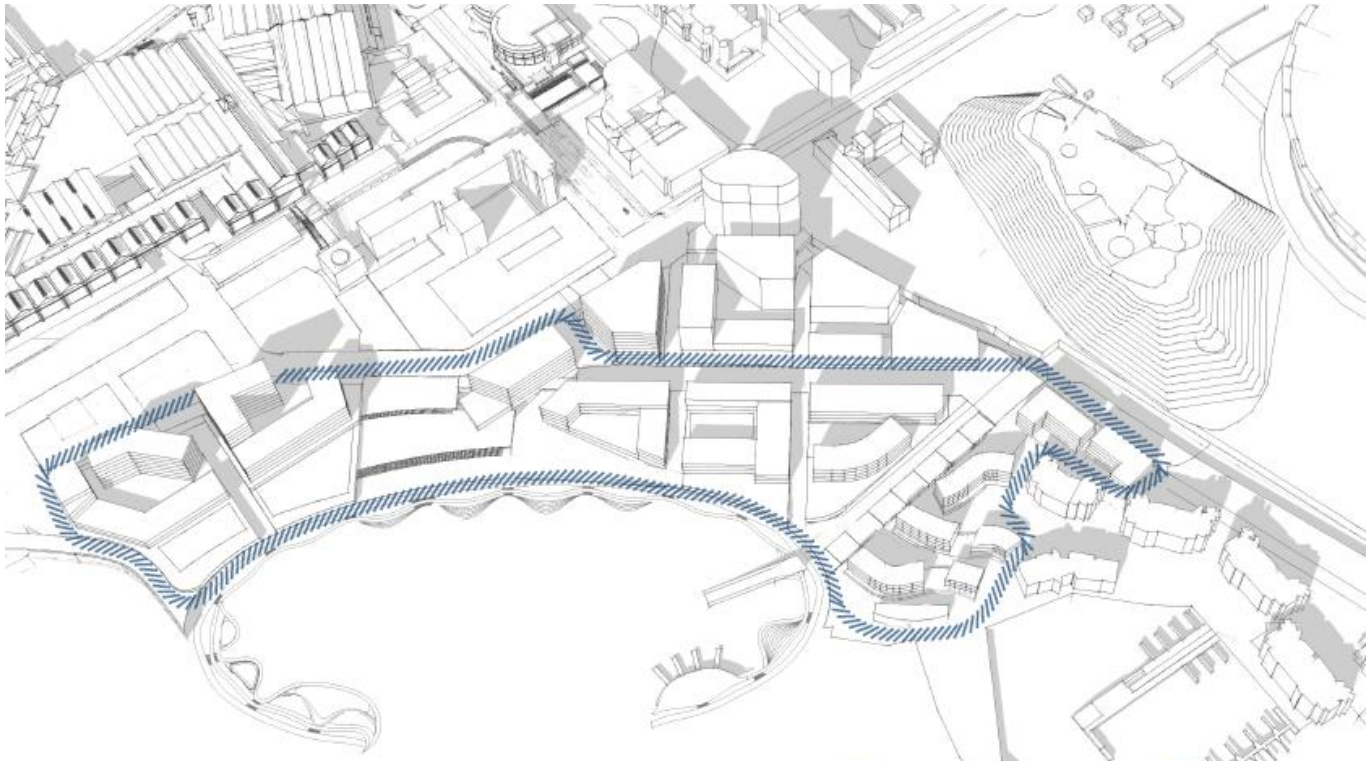
No major access road upgrades are proposed. Over and above public transport, site access improvements will entail:

- Access for private vehicles will be from Beach Road and Granger Bay Boulevard Extension (GBB Ext.) unchanged from the previous EIA.
- A pedestrian priority, shared space street will link the existing intersection of Haul Road and Beach Road with Granger Bay Boulevard and will provide local access to the development packages.
- A service/ entrance plaza off Granger Bay Boulevard will allow for service vehicles and private vehicle access to residential and hotel development packages and basement parking.
- Access off Beach Road for the boat launch facility will remain and be enhanced by a linear park space within the 30m view corridor.
- Vehicular access to major parking garages will be from Granger Bay Boulevard and future Bay Street with access to the coastal walk only permitted for service vehicles.
- Surface parking areas will be limited in order to create pleasant and usable internal spaces in the precinct.

The proposed revetment and breakwater will be constructed in phases over approximately 6 years. The marine works for land reclamation will be the necessary first phase of the development and will be phased over a period of around 2,5 years. The proposal envisages that Granger Bay will be a vibrant leisure, recreational and residential precinct of the city. With the coastal public walkway and amenities such as an upgraded slipway, tidal pools, public seating areas and parks, it is intended that this development be synonymous with Cape Town's ocean setting and achieve active public connection with the water's edge.

The total reclamation area is substantially more than the previous EIA reclamation area. The land area to be utilised for development packages area has increased from the previous EIA from 4,5 ha to 5,5ha, principally owing to the the desire to create a rock revetment instead of simply an engineered solution of dolosse for shore protection, and to have a sheltered bay for better recreational and leisure use.

The Development Controls which prescribe parameters applicable to the development proposals are extracted below.



Granger Bay

Phase 2 Development Controls.

November 2023

1. INTRODUCTION

1.1 PURPOSE

The purpose of this document is to outline the development guidelines informing the future development in the Granger Bay Precinct, which includes packages 1- 14 (See page overleaf).

The generic guidelines applicable to all packages within the EIA area are first outlined, after which the specific guidelines and envisaged massing of the various packages are demonstrated.

The massing and visual impact of the proposed EIA and reclamation area are then compared to the visual impact and massing study of the approved 2018 EIA development packages.

1.2 HERITAGE INDICATORS

These guidelines have been informed by the decisions and recommendations contained in the Heritage Record of Decision (22 June 2011) as illustrated in the heritage indicators in figure 1.

It should be noted that the heritage fixes established in the approved EIA of 2018 have been incorporated and the proposed placement and massing of development responds to these fixes in a manner that is consistent with the approved EIA. Figure 1 provides a spatial expression of the heritage indicators and controls.

Of particular relevance is the Arc of Fire from Fort Wynyard which limits the heights of buildings in order to preserve views across Granger Bay. A visual corridor of 30m wide from Fort Wynyard to the coast is provided to allow for a visual connection between the historic Fort Wynyard and the ocean.

The area outlined in blue indicates the full extent of the EIA Amendment area.

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

2. DEVELOPMENT GUIDELINES

2.1 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

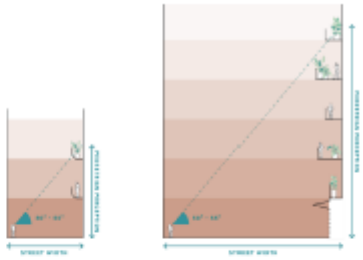


FIG 4 PEDESTRIAN PERCEPTION OF TALL BUILDINGS ON NARROW AND WIDE STREETS

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

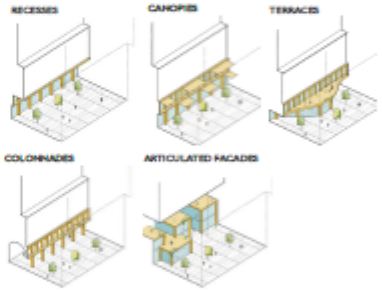


FIG 3 INDICATIVE INTERFACE CONDITIONS EDGING PEDESTRIAN ROUTES AND KEY PUBLIC SPACES

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

FIG 2 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
- View corridor clear from development
- Gateway

2.2 PACKAGE SPECIFIC GUIDELINES

Package 1, 2 & 6

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

Package 7, 8, 11 & 12

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

Package 9 & 10

8. 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
9. Buildings are to cascade down toward the ocean to optimise views

Package 13 - 14

10. Building edges to be treated sensitively in relation to the public realm
11. 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
12. The height of the building portions located outside the arc of fire may be higher up to a maximum of 32m MSL
13. The use of internal courtyards is encouraged to optimise solar gain onto building facades

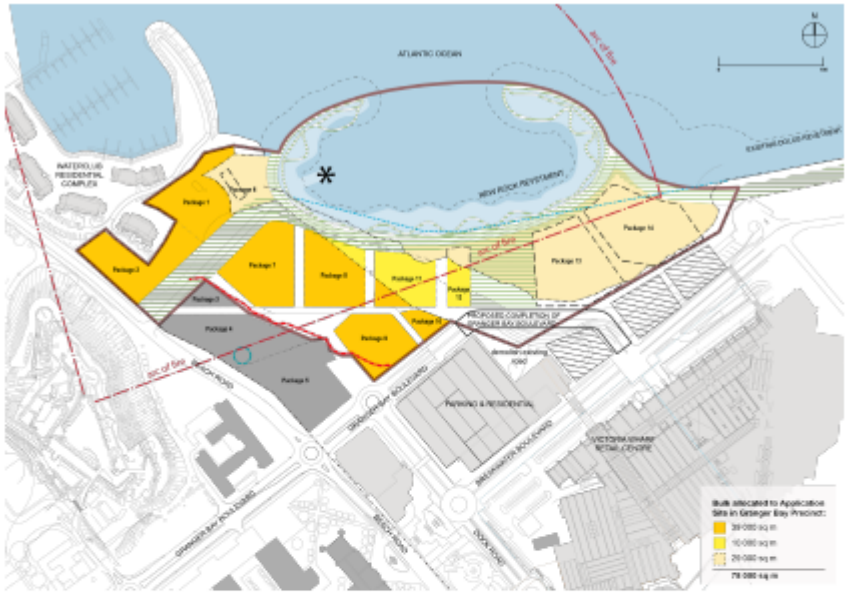


FIG 6 EIA AMENDMENT DIAGRAM, 2021

- Application Site
- V&A Boundary
- 100m HWM
- 2018 Approved Revetment Line
- Arc of Fire
- Land to be reclaimed
- Sea Park / Public Coastal Walkway
- Boat launch facility
- Proposed new waste water treatment plant location
- Phased development in remainder of Granger Bay Precinct
- Building Development Packages: Primary land use and hotel
- Building Development Packages: beyond previous EIA development line
- Building Development Packages: on land to be reclaimed
- Notional future development

2.2.1 PACKAGE 1, 2 & 6 DEVELOPMENT GUIDELINES

FIG 7 LOCALITY PLAN, VIEW 1: PACKAGE 1, 2 & 6

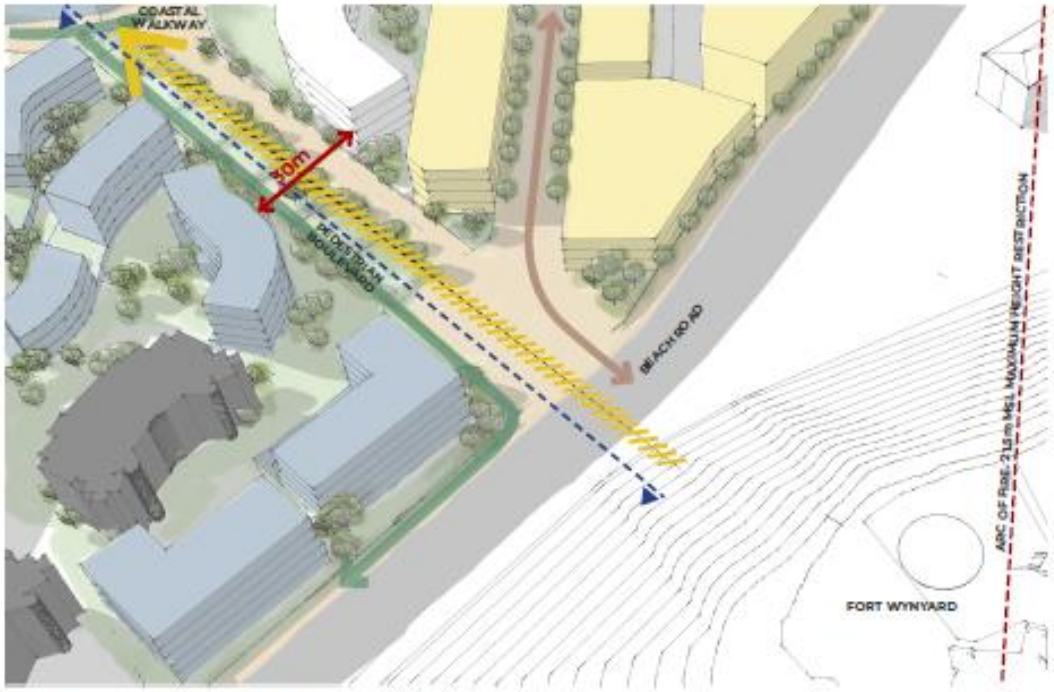


FIG 8 VIEW 1: PACKAGE 1, 2 & 6 APPLICATION OF DESIGN CONSTRAINTS

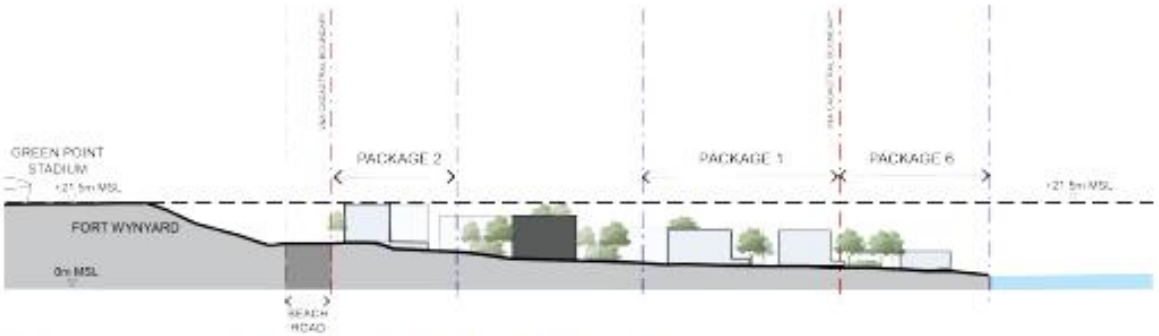


FIG 9 SECTION FROM FORT WYNYARD TO THE OCEAN INDICATING THE 21.5 MSL HEIGHT DATUM, THE ARC OF FIRE

- Primary public pedestrian route
- Primary view corridor
- 30m view corridor width
- Internal link
- Arc of fire 21.5m MSL height limit
- Section line
- Existing Waterclub
- Packages 1, 2 & 6
- 2021 Proposed development outside the EIA amendment study area

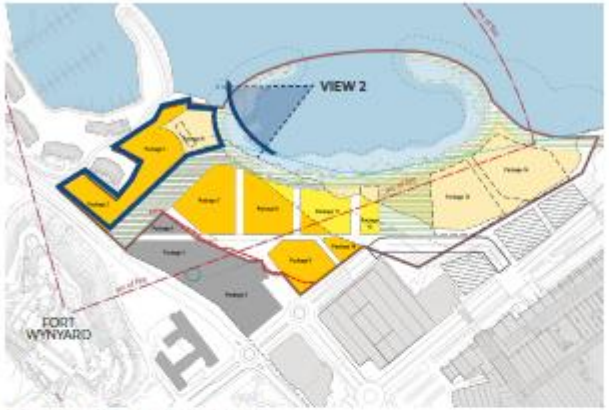


FIG 10 LOCALITY PLAN, VIEW 2: PACKAGE 1, 2 & 6

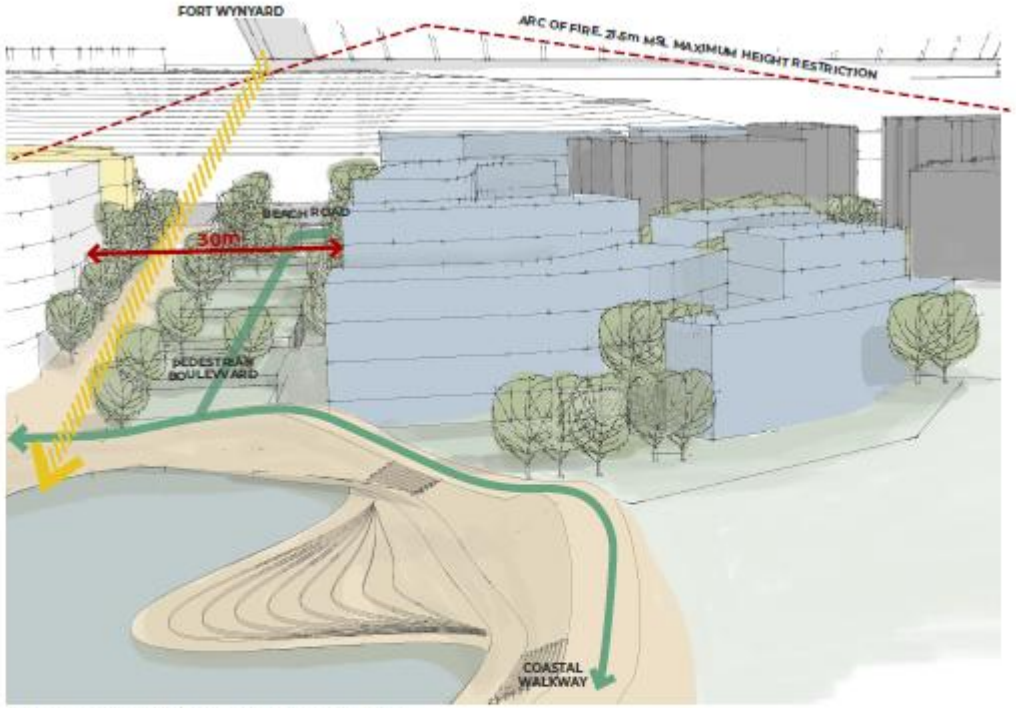


FIG 11 VIEW 2: PACKAGE 1, 2 & 6 APPLICATION OF DESIGN CONSTRAINTS

- 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
- 2021 Proposed development outside the EIA amendment study area

FIG 12 LOCALITY PLAN, VIEW 3: PACKAGE 1, 2 & 6

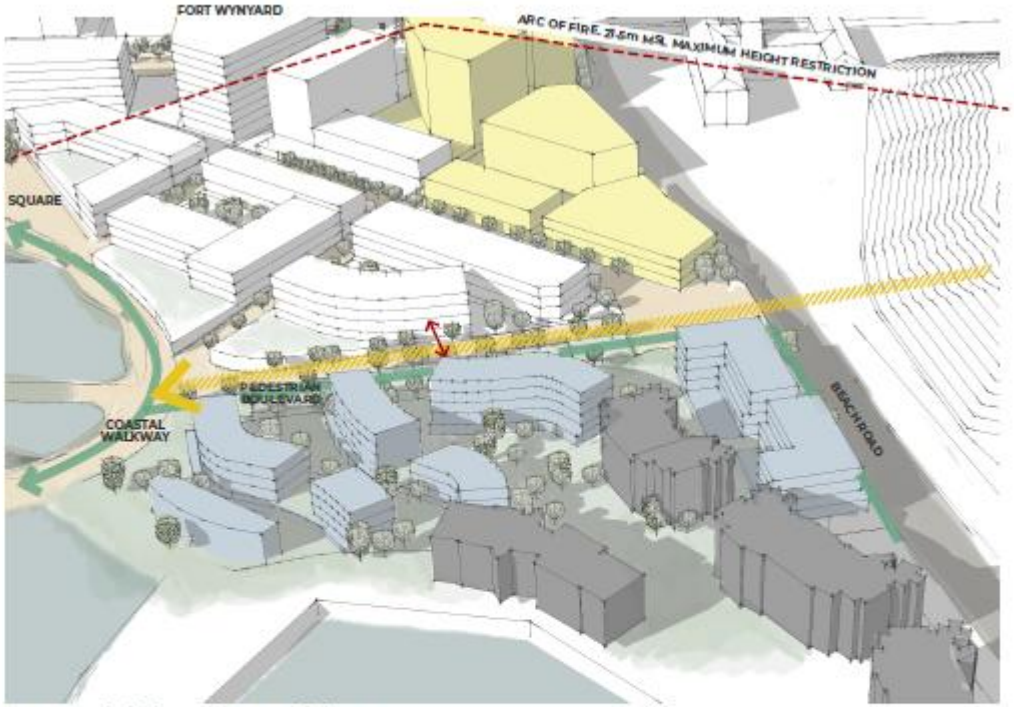


FIG 13 VIEW 3: PACKAGE 1, 2 & 6 APPLICATION OF DESIGN CONSTRAINTS

- 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

2.2.2 PACKAGE 7, 8 11 & 12 DEVELOPMENT GUIDELINES

FIG 14 LOCALITY PLAN. VIEW 4: PACKAGE 7, 8, 11 & 12

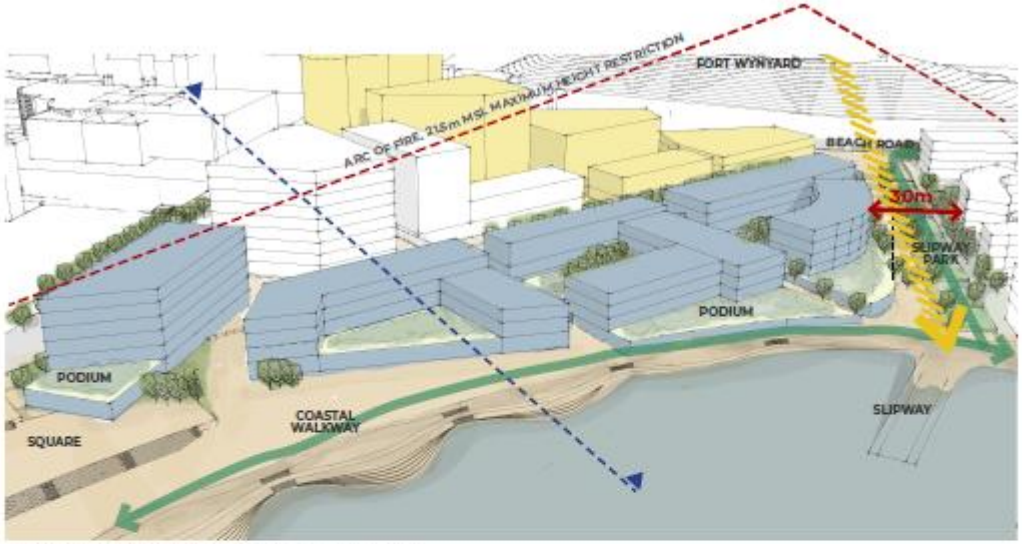


FIG 15 VIEW 4: PACKAGE 7, 8, 11 & 12 APPLICATION OF DESIGN CONSTRAINTS

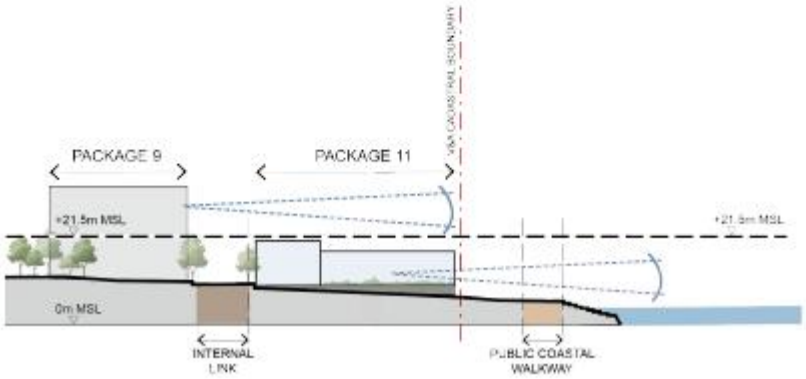


FIG 16 SECTION THROUGH PACKAGE 9 & 11. PACKAGE 9 (NOT LOCATED WITHIN THE ARC OF FIRE) AT A LOWER HEIGHT TO NOT OVERSHADOW PACKAGE 11 WHICH IS LOACTED IN THE ARC OF FIRE

- Primary public pedestrian route
- Primary view corridor
- 30m view corridor width
- Arc of fire 21.5m MSL height limit
- Section line
- Packages 7, 8, 11 & 12
- 2023 Proposed development outside the EIA amendment study area

2.2.3 PACKAGE 9 & 10 DEVELOPMENT GUIDELINES

FIG 17 LOCALITY PLAN. VIEW 5: PACKAGE 9 & 10

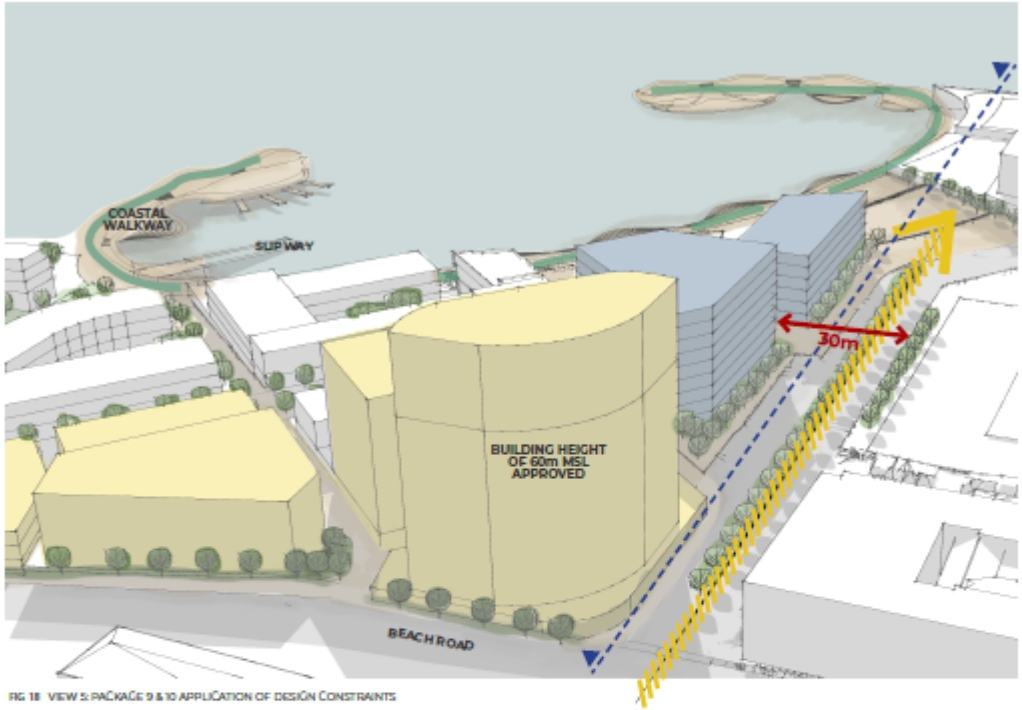
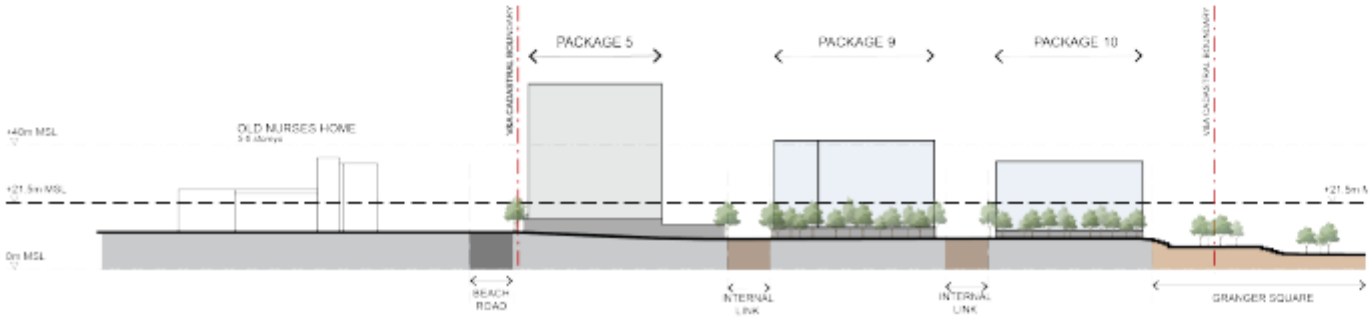


FIG 18 VIEW 5: PACKAGE 9 & 10 APPLICATION OF DESIGN CONSTRAINTS



Primary public pedestrian route
Primary view corridor
30m view corridor width
Arc of fire 21.5m MSL height limit
Section line
Packages 9 & 10
2023 Proposed development outside the EIA amendment study area

FIG 19 SECTION ALONG GRANGER BAY BOULEVARD. CASCADING OF BUILDING HEIGHTS TOWARDS THE OCEAN.

2.2.4 PACKAGE 13 & 14 DEVELOPMENT GUIDELINES

FIG 20 LOCALITY PLAN, VIEW 6: PACKAGE 13 & 14

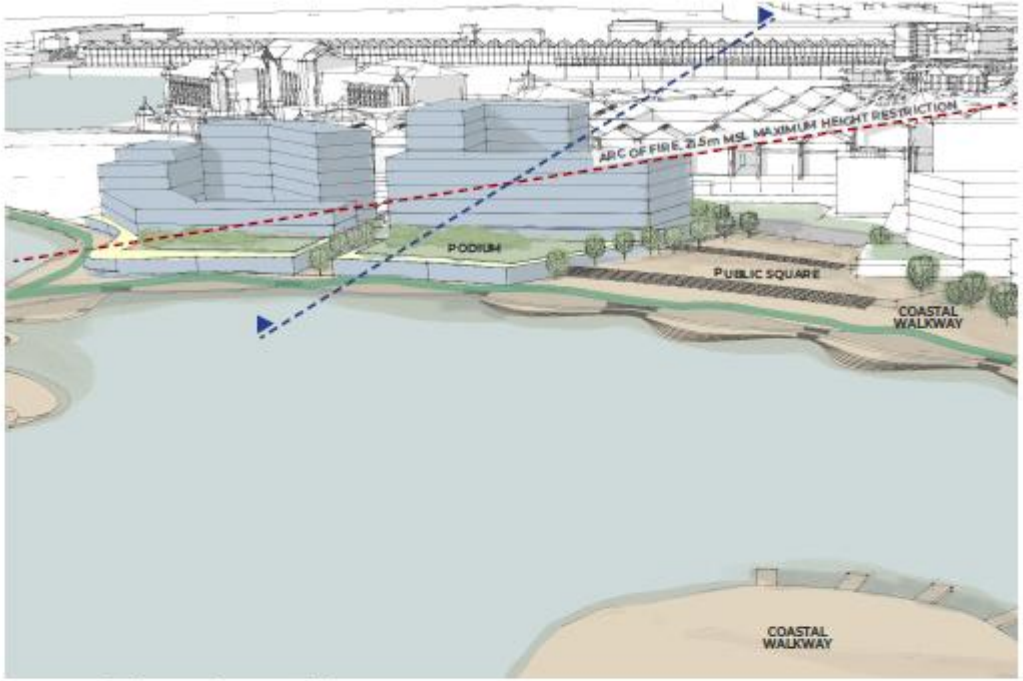


FIG 21 VIEW 6: PACKAGE 13 & 14 APPLICATION OF DESIGN CONSTRAINTS

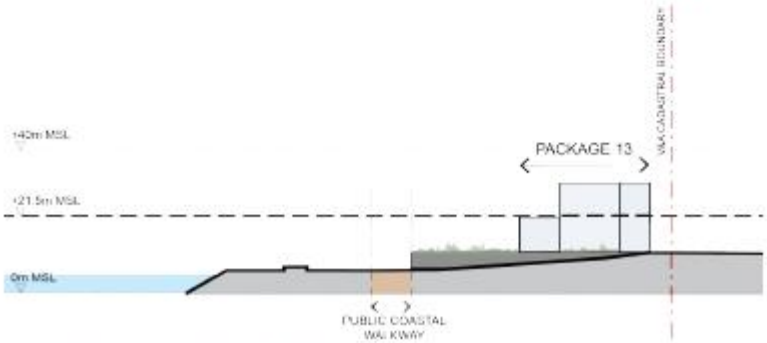


FIG 22 SECTION THROUGH THE PUBLIC SQUARE TOWARDS THE OCEAN

- Primary public pedestrian route
- Arc of fire 21.5m MSL height limit
- Section line
- Packages 13 & 14
- 2021 Proposed development outside the EIA amendment study area

2.2.5 PACKAGE 13 & 14 DEVELOPMENT GUIDELINES

FIG 23 LOCALITY PLAN, VIEW 7: PACKAGE 13 & 14

FIG 24 VIEW 7: PACKAGE 13 & 14 APPLICATION OF DESIGN CONSTRAINTS

- Primary public pedestrian route
- Arc of fire 21.5m MSL height limit
- Packages 13 & 14
- 2023 Proposed development outside the EIA amendment study area

14. Heritage Impact Assessment

Impact Assessment Tables are included in Annexure G and the associated specialist reports.

14.1 Precedent approvals

This impact assessment is contextualised within two significant parameters:

14.1.1 Previous HWC Final comment on the 2019 straight line revetment scheme.

Whilst not required in terms of the NEMA process as this EIA process is to be undertaken anew, regardless of previous approvals, the **2015 HWC Final Comment** to the previous proposal does establish a comparative basis for assessment. This has however in part been superseded by the decisions made in respect of 2024 HWC approval of the bulk rezoning expansion of the V&AW.

The mitigations and conditions included in said Final Comment have in the main now been included in the UDG and Granger Bay Phase 2 Development Controls. This includes, with reference to the extracts right and below:

Mitigation 2: p4 of the Development Controls:

- 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

Conditions 1 – 3; 6 & 7: p2, 3 and 4 of the Development Controls

- A visual corridor of 30m wide from Fort Wynyard to the coast is provided to allow for a visual connection between the historic Fort Wynyard and the ocean.
- 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
- 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.
- The use of balconies, pergola's, screens and or roof over hangs should be promoted to articulate building facades

Extract 2015 HWC Final Comment

1. The essential mitigation measures and the optional mitigation measures must all be considered essential mitigation measures.
2. **The height of the proposed buildings adjacent to the Water Club and all indicated 'A' on the** Figure 23 must be moderated by a review of the angle of declination so as to ensure that the remaining view from the fort is protected from cumulative impacts. Structures on the roofs of these buildings must be included in these height restrictions.
3. **The future SDP's must be referred back to this Committee for consideration**
4. The archaeological survey report must be submitted to HWC for its record.

The following conditions, contained in the consultant's recommendations in the HIA report, are endorsed:

1. The top floor of buildings flanking the view corridor of the main gun placement of Fort Wynyard must have a different architectural treatment, which must be lighter and more fragmented in form and set back from the main structure.
2. The 30m view corridor in front of Fort Wynyard must be treated as a major public space, linking the Sea Point promenade to the Waterfront and be appropriately landscaped.
3. Buildings on either side of this corridor must be staggered to open up the corridor. The top two floors on either side of the view corridor must be set back behind the envelope established by the approved Beach Road development as illustrated in the VIA (Viewpoint 5) .
4. The continuity of the coastal corridor must be ensured for public access and visual amenity

(views of mountain and sea) and must be between 20 and 30m wide. Blank, non-active edges and access to underground parking must be kept to a minimum along the promenade.

5. Public access to the water's edge via the 30m view corridor must not be impaired in any way. This includes access for fishing boats under the management control of the licensee for the Oceana Boat Club slipway (see DEA&DP permit of 23/10/2014), to ensure that traditional patterns of access for the fishing community are ensured.
6. Gaps between buildings must be established to enable a degree of visual permeability and to maximize potential sea views from Beach Road, as provided for in terms of the approved Granger Bay (Phase 1) Precinct Plan
7. Building forms must be articulated and fragmented. The continuous, potentially monolithic slabs as indicated in the present block diagrams, which represent a worst case scenario, must not be permitted.
8. The building form and architectural character and the spaces between them must be subjected to urban, architectural and landscaping guidelines which must form part of the SDP approval process and which must be incorporated into any conditions of approval at the SDP level.
9. Before construction starts a physical survey must be carried out by a qualified maritime archaeologist to verify if any remains of a wreck are observed on the sea bed. A proton-magnetometer survey must be done to identify the presence of wrecks buried in the sand. If any wreck is found it must be identified, recorded and documented, and, depending on the significance, it must either be removed (if significant) or back filled under the new development after documentation.
10. Shipwrecks are protected under the National Heritage Resources Act (25 of 1999) and a permit for their excavation is required to be obtained from the SAHRA Maritime Unit if any wreck would have to be disturbed.

Condition 4:
Whilst certain inferences can be extrapolated from the UDG and DC regarding the public coastal walkway and public spaces, aside from the 9m wide walkway itself, all other details are notional and the setbacks from buildings not explicitly detailed.

Condition 5:
The Notional Precinct Plan includes provision for the slipway but no details.

14.1.2 HWC approval of the V&AW rezoning and bulk expansion application, 2024.

The **2024 HWC approval of the bulk rezoning expansion** of the V&AW did not include the proposals related to the current land reclamation, but it did establish important guidelines, based on the Draft CMP, for the extent to which additional development should undergo impacts in terms of the NHRA.

The 2024 HIA recommended, and HWC supported, the following assessments in respect of this area, and for the parcels identified in the key diagram:

Development parcels respond to the established view corridor along Granger Bay Boulevard towards the ocean.

The upper reaches of Breakwater Boulevard are contextually appropriate. The denser development lining Granger Bay Boulevard will define the wide boulevard and be in proportion to the width of the boulevard. Parcels are fragmented to facilitate views of the ocean and pedestrian access to the coastal walkway/promenade.

It is noted that the view to the west from the end of Portswood Ridge is already quite compromised in terms of sea views towards Granger Bay, and so the impact of new development is limited

No further studies in terms of the provisions of the NHRA.

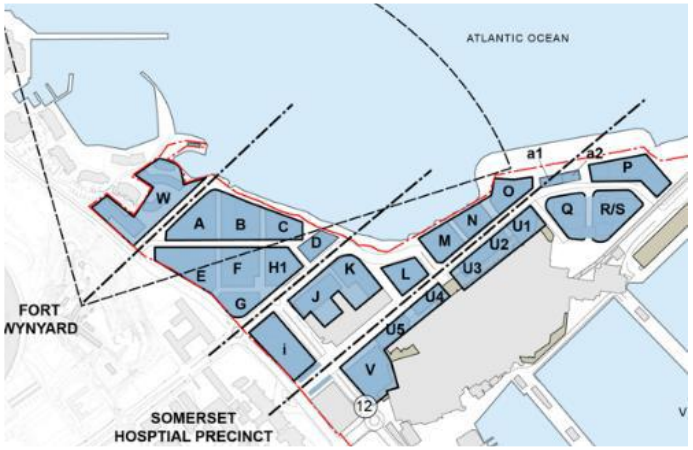


Figure 47: Key diagram: 2024 HIA Bulk rezoning expansion

Figure 48: Existing view from Granger Bay Boulevard with proposed new development shown in light blue (V&AW)

In respect of Parcels W, A, B, C & E: fall within Beach Road Precinct HIA already approved in 2011 (RoD dated 22-06-2011) subject to conditions: no building to be higher than 21.5m (MSL) within Arc of Fire; scale and grain of buildings is to be fragmented; 30m wide view corridor between Fort Wynyard and existing coastline; view corridor to accommodate a road and pedestrian link.
Complies with existing approval

In respect of parcel D, the proposed massing contextually appropriate in relation to approved GB Parcel H1. The proposed height reflects a cascading of heights down toward the ocean to optimise views. This is confirmed in 3D modelling. At Granger Bay, the site is less visually sensitive from a townscape perspective, and visually the Arc of Fire has been clearly defined and upheld within the development proposal, as has the principle of access to the water's edge. In addition, a continuity with the heights established along Beach Road allow for a continuity of fabric that will ensure townscape integrity, and the screening role played by Victoria Wharf to the historic core of the site **would ensure an acceptable degree of visual impact**.

Parcel D: No further studies in terms of the provisions of the NHRA.
General conformity with HDI
Acceptable degree of visual impact.

The UDG have explicitly incorporated the key heritage indicators into the guidelines for development in Granger Bay, including the Fort Wynyard Arc of Fire, primary view corridor and major pedestrian spaces, including the links to and along the waters edge. The principle of cascading heights is applied…. These principles will continue to be applied and assessed by the City at SDP level.

The Urban Design Guidelines also include a "public access to the water's edge" diagram, which shows a continuous public pedestrian route running along the coastal edge of Granger Bay (Fig. 17, 18 & 19 in UDG). …. SDPs for parcels along the coast will be required to show how public access is accommodated, for assessment and approval by the CoCT.

Hence, the requirement for continuous public pedestrian access along the coastal edge is confirmed. The section drawings indicate that the public pedestrian walkway area will be a minimum of approximately 9m.

In terms of Section 38(4) of the NHRA: …
Specifically supports the development of Parcels … 12 W, A, B, C, D and E as proposed with no further requirements in terms of the provisions of the NHRA
Specifically supports the development of Parcels 12 J, K, L, M and N; … as proposed with no further requirements in terms of the provisions of the NHRA, subject to the following archaeological mitigation conditions …

14.2 Impact Assessment

As per the approved 2019 scheme, only building envelopes indicating building heights and bulk have been made available for the preparation of these reports. 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. It is assumed that these will be required for the Site Development Plan (SDP) phase.

14.2.1 Archaeology

Activities associated with the Proposed Development of the Granger Bay Precinct and Reclamation of Land project have the potential to impact pre-colonial archaeological sites and material and any maritime archaeological resources within the project area.

From the baseline descriptions, it appears unlikely that terrestrial historical archaeological resources are present on the project site, and this receptor has been scoped out of the impact assessment.

Similarly, although there is the potential for the presence of submerged prehistoric archaeological material within the seabed sediments in the maritime portion of the project area, this is likely to be extremely low. The nature of the proposed work in this area – the depositing of fill on the seabed – also means that the direct interventions into the seabed that might encounter such material will not take place. Submerged prehistoric archaeological material is, therefore, scoped out of this assessment.

14.2.1.1 Pre-Colonial Terrestrial Archaeology

The main impacts to undisturbed pre-colonial archaeological material which survives under later landfill or development will occur during construction activities related to the Proposed Development of the Granger Bay Precinct and Reclamation of Land project and may arise where construction activities reach and disturb the original land surface.

These impacts will be direct impacts which will result in the damage to, or destruction of archaeological sites and/or artefacts. Impacts will be local in extent, occurring only within the footprint of development-related activities, but their duration will be permanent, because archaeological sites and materials are a non-renewable resource and cannot recover if damaged.

Given the rarity of surviving pre-colonial archaeological material in the developed urban context of this part of the city, the significance of impacts is likely to be high, but with the implementation of suitable mitigation measures would be reduced to low.

14.2.1.2 Maritime Archaeology

The nature of the activities proposed in the maritime portion of the project area – fill and reclamation – mean that although any wreck material present in the area is unlikely to be physically destroyed, it will be heavily impacted and effectively made inaccessible as a heritage resource.

Impacts to historical shipwrecks will be local in extent, but permanent. Because no wrecks have been previously reported in the Granger Bay Land Reclamation project, it is difficult to assess the significance of any impacts, which depends to a large degree on the archaeological value of the affected site or material. It is, however, likely that impacts to a previously undiscovered wreck will be medium to high, which could be reduced to low with the implementation of suitable mitigation measures.

Archaeological impacts can be expected particularly during the construction phase.

The Archaeological Impact Assessment Tables can be found in the Specialist Report (Annexure C). A comparative impact assessment is undertaken in the following tables.

It should be noted that in this respect, the impact rating provided in the 2015 Phase II HIA did not address the full range of assessment criteria. This is reflected in this tables.

Table 3: Comparative assessment of impacts of the No-Go, 2019 and current development proposals on pre-colonial archaeological resources.

Criteria	Scoring	No -Go Alternative	Proposed 2019 mixed-use development **	Proposed 2025 mixed-use development
Impact	**Potential Impacts of Construction Activities on impact of loss of or damage to pre-colonial archaeological resources**			
Extent	• Site Specific • Local (<2km) • Regional (within 30km) • National • International	No construction, no impact	Site specific	Site specific
Intensity	• High (severe alteration) • Medium (notable alteration) • Low (Negligible alteration)	No construction, no impact	Medium - High	Medium
Duration	• Temporary (<1year) • Short term (1-6 years) • Medium term (6-15 years) • Long term (cease after operational life) • Permanent	No construction, no impact	Medium – Long Term	Permanent
Reversibility	• High reversibility • Moderate • Low • Non reversible (permanent)	No construction, no impact	-	Non-reversible
Irreplaceability	• High • Moderate • Low • Replaceable	No construction, no impact	-	High irreplaceability
Probability	• Improbable • Probable (<50%) • Highly probable (50% - 90%) • Definite (>90%)	No construction, no impact	Probable	Improbable
Significance before mitigation	• Low - very low • Medium • High	No construction, no impact	Medium - High	Medium
Status	• Positive • Negative • Neutral	No construction, no impact	Negative	Negative
Confidence	• Low • Medium • High	High	Medium	Low
Significance after mitigation		No construction, no impact	-	Low

Table 4: Comparative assessment of impacts of the No-Go, 2019 and current development proposals on maritime archaeological resources.

Criteria	Scoring	No -Go Alternative	Proposed 2019 mixed-use development **	Proposed 2025 mixed-use development
Impact	**Potential Impacts of Construction Activities on impact of loss of or damage to pre-colonial archaeological resources**			
Extent	• Site Specific • Local (<2km) • Regional (within 30km) • National • International	No construction, no impact	Site specific	Site specific
Intensity	• High (severe alteration) • Medium (notable alteration) • Low (Negligible alteration)	No construction, no impact	Medium - High	Medium
Duration	• Temporary (<1year) • Short term (1-6 years) • Medium term (6-15 years) • Long term (cease after operational life) • Permanent	No construction, no impact	Medium – Long Term	Permanent
Reversibility	• High reversibility • Moderate • Low • Non reversible (permanent)	No construction, no impact		Non-reversible
Irreplaceability	• High • Moderate • Low • Replaceable	No construction, no impact		High irreplaceability
Probability	• Probable (<50%) • Highly probable (50% - 90%) • Definite (>90%)	No construction, no impact	Probable	Probable
Significance before mitigation	• Low - very low • Medium • High	No construction, no impact	Medium - High	High
Status	• Positive • Negative • Neutral	No construction, no impact	Negative	-ve
Confidence	• Low • Medium • High	High	Medium	Medium
Significance after mitigation		No construction, no impact		Low

14.2.2 Fort Wynyard site lines

The Granger Bay Development Controls have explicitly included the surveyed view cones and roof heights in the "arc of fire" are to be kept to 21.5m above MSL.

Granger Bay Development Controls have also explicitly included a 30m wide view corridor which will provide a sight line to the water's edge from Beach Road and the large gun emplacements at Fort Wynyard.
The differential treatment of the top floor of the buildings flanking the view corridor is a guideline contained in the Urban Design Guidelines and the City of Cape Town's Tall Building Policy.

The visual intrusion on the Sense of Place from Fort Wynyard has been addressed and is not a visual issue.

The height and massing of the proposed new development parcels 13 and 14 on reclaimed land conform to the arc of fire view lines.

The heritage indicator has been satisfied and impacts are expected to be Low.

Figure 49: extracts from the Granger Bay Phase 2 Development Controls

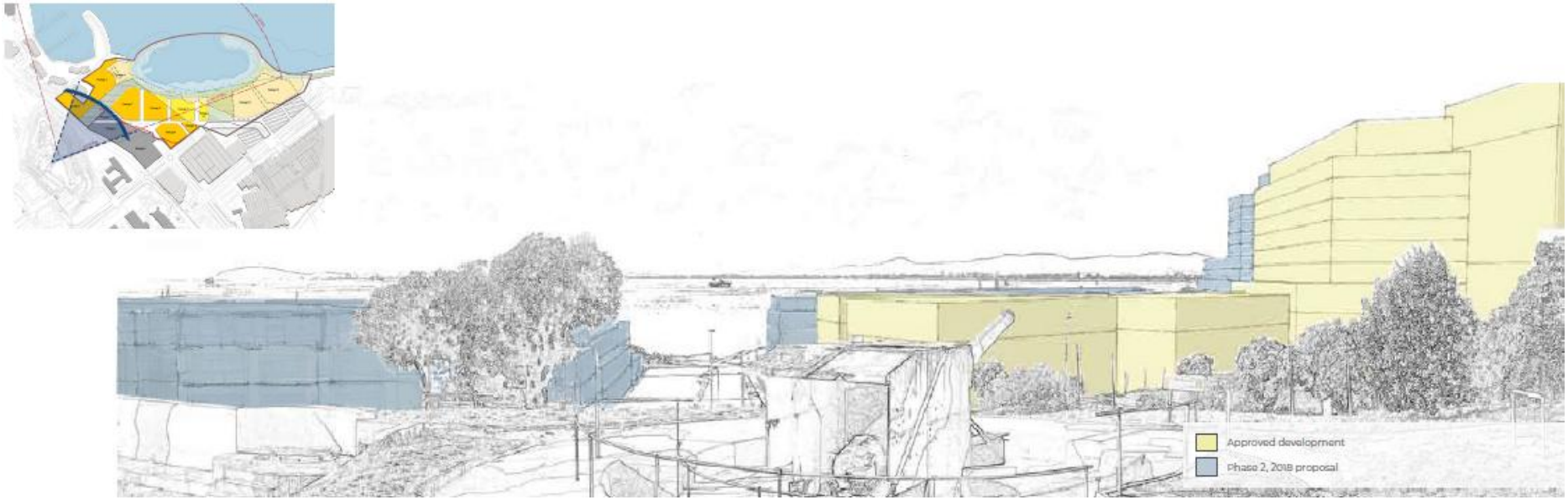


Figure 50: Approved 2017 EIA VIA from Fort Wynyard cannon

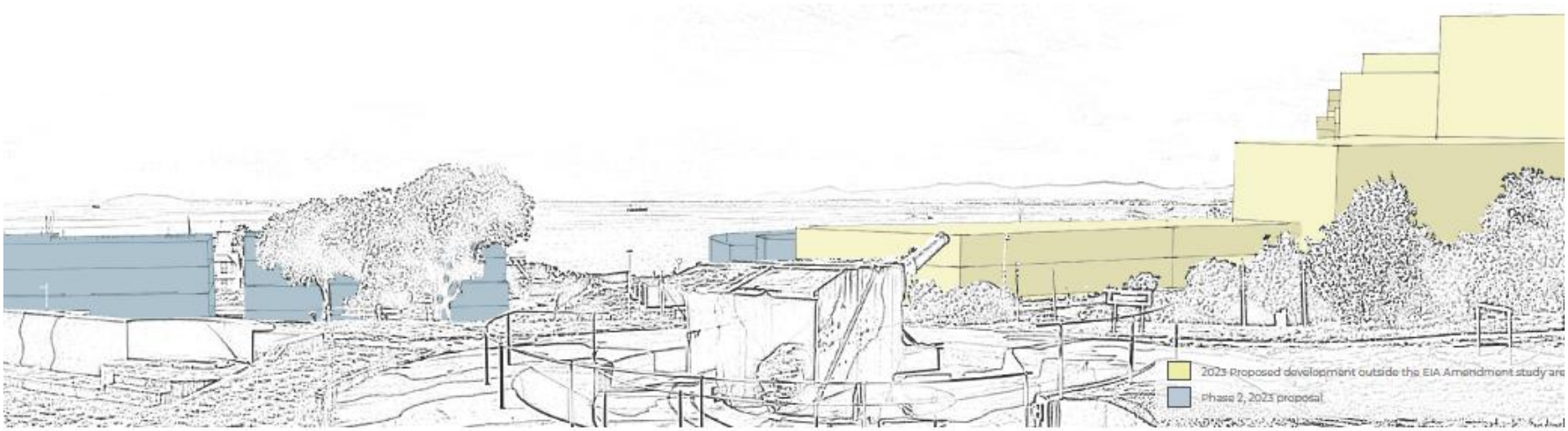


Figure 51: Indicative future view from Fort Wynyard cannon per current revised proposal

Figure 52: Approved 2017 EIA VIA from Fort Wynyard.

Figure 53: Indicative future view from Fort Wynyard per current revised proposal.

14.2.3 Other potential visual impacts

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.

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.

The proposed development of residential buildings in Packages 1 and 2, immediately adjacent to The Water Club, will be close to the Water Club 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 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 will be some unobstructed views and some partially obstructed views. The figure following indicates the proposed arrangement of buildings and heights in relation to The Water Club buildings. However, whilst of likely concern to the Water Club residents, this is not a heritage consideration.

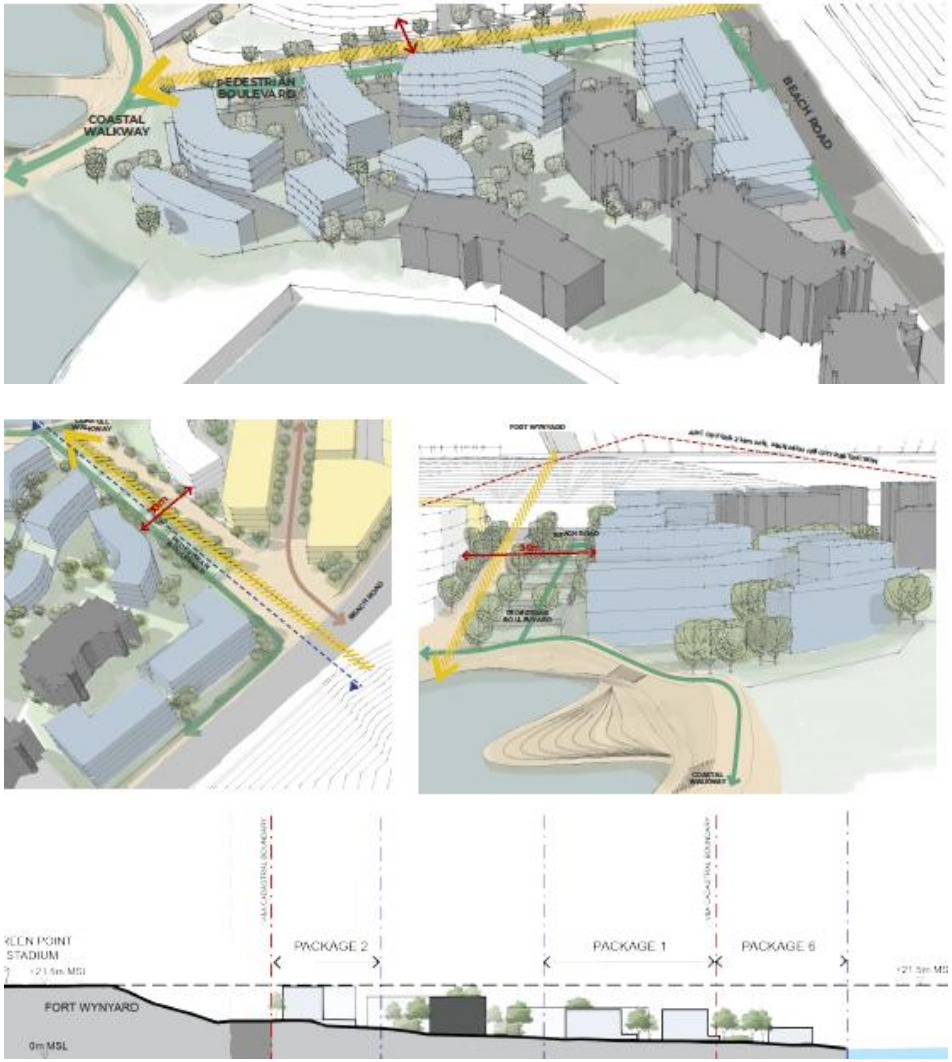


Figure 54: Proposed buildings in Packages 1, 2 and 6 showing heights and approximate widths.

Figure 55: Proposed revetments provide for views south to Table Mountain which would probably be obstructed by proposed buildings along most of the coastal walkway.

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 light pollution and sky glow.

Construction Phase

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.

Operational phase

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.

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 provide a comparative rating of the visual impacts. Further tables can be found in the specialist report, Annexure D.

Table 5: Visual Intrusion on Sense of Place (Operational Phase) - comparative

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
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

The 2025 visual impact significance is rated <u>medium - high before mitigation and medium after mitigation.</u>

Table 6: Intensity of Visual Impacts - comparative

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
Overall Impact intensity		Range is Low to medium	Range is Medium high to high	Range is Medium high to high

Figure 56: Approved 2017 EIA VIA from Radisson Breakwater with mitigations

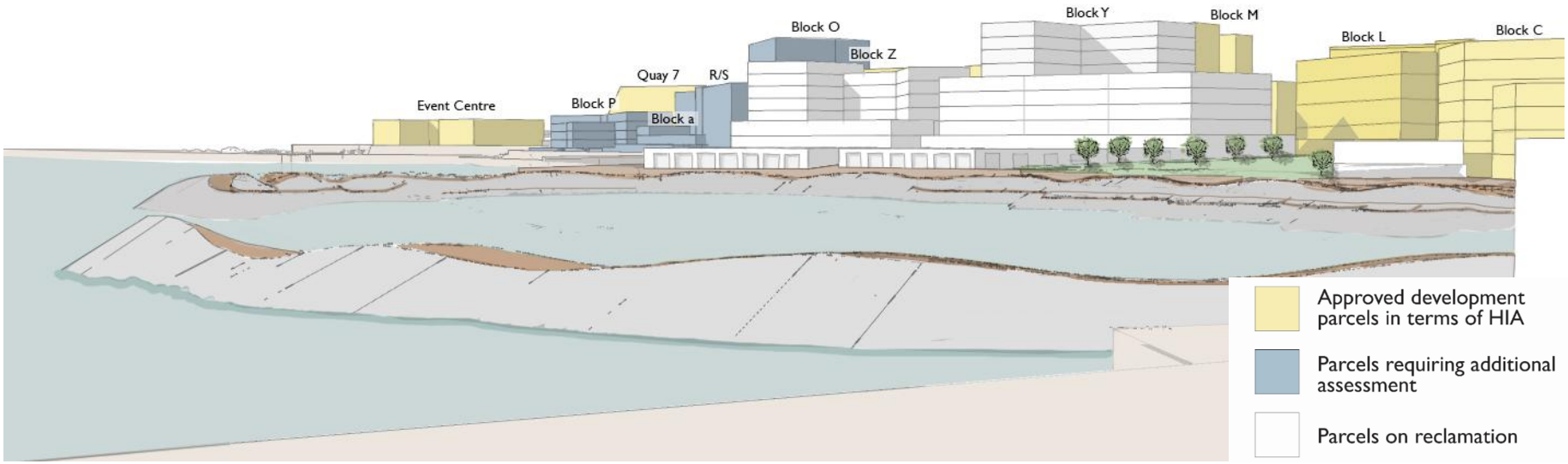
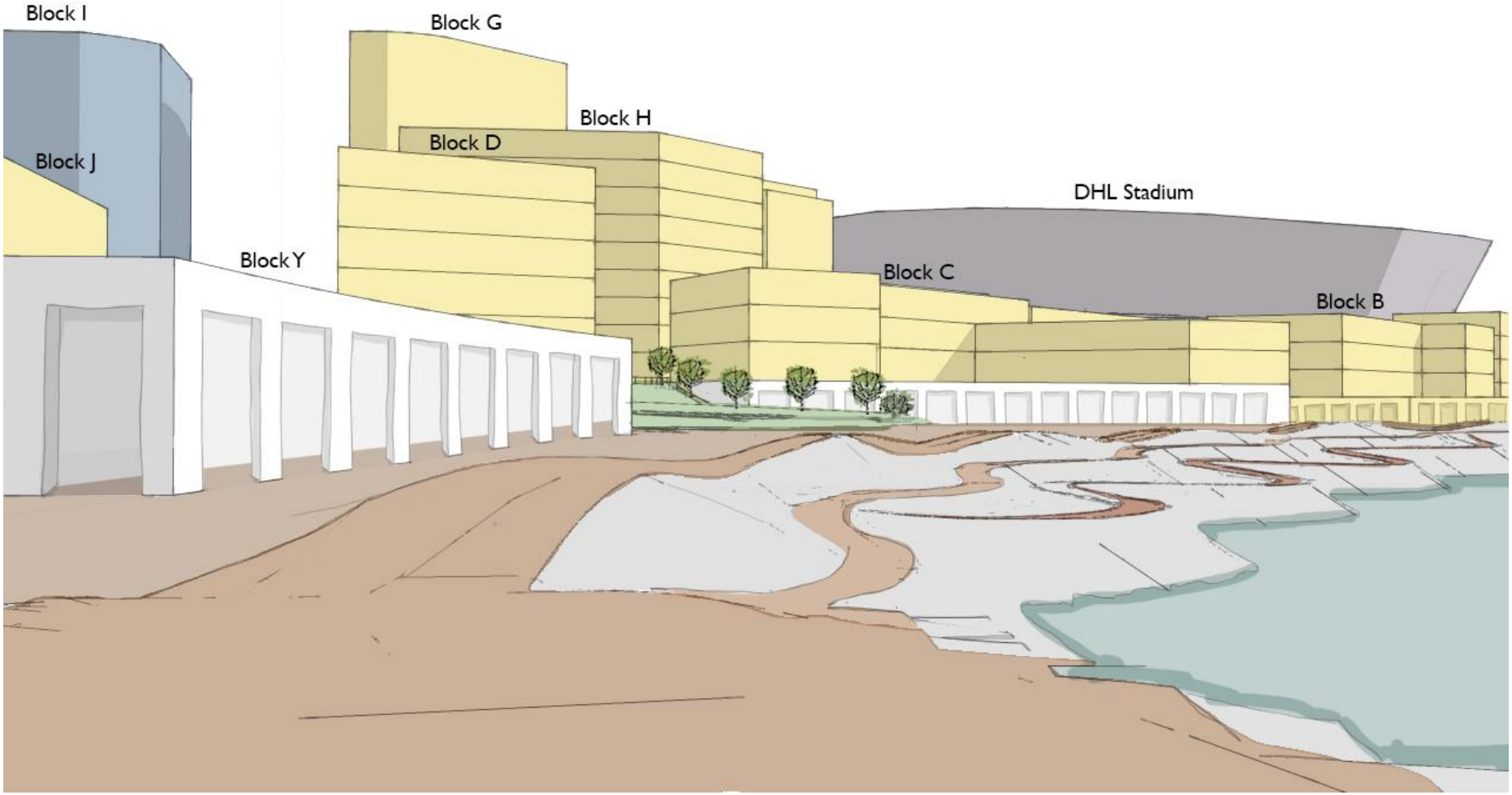
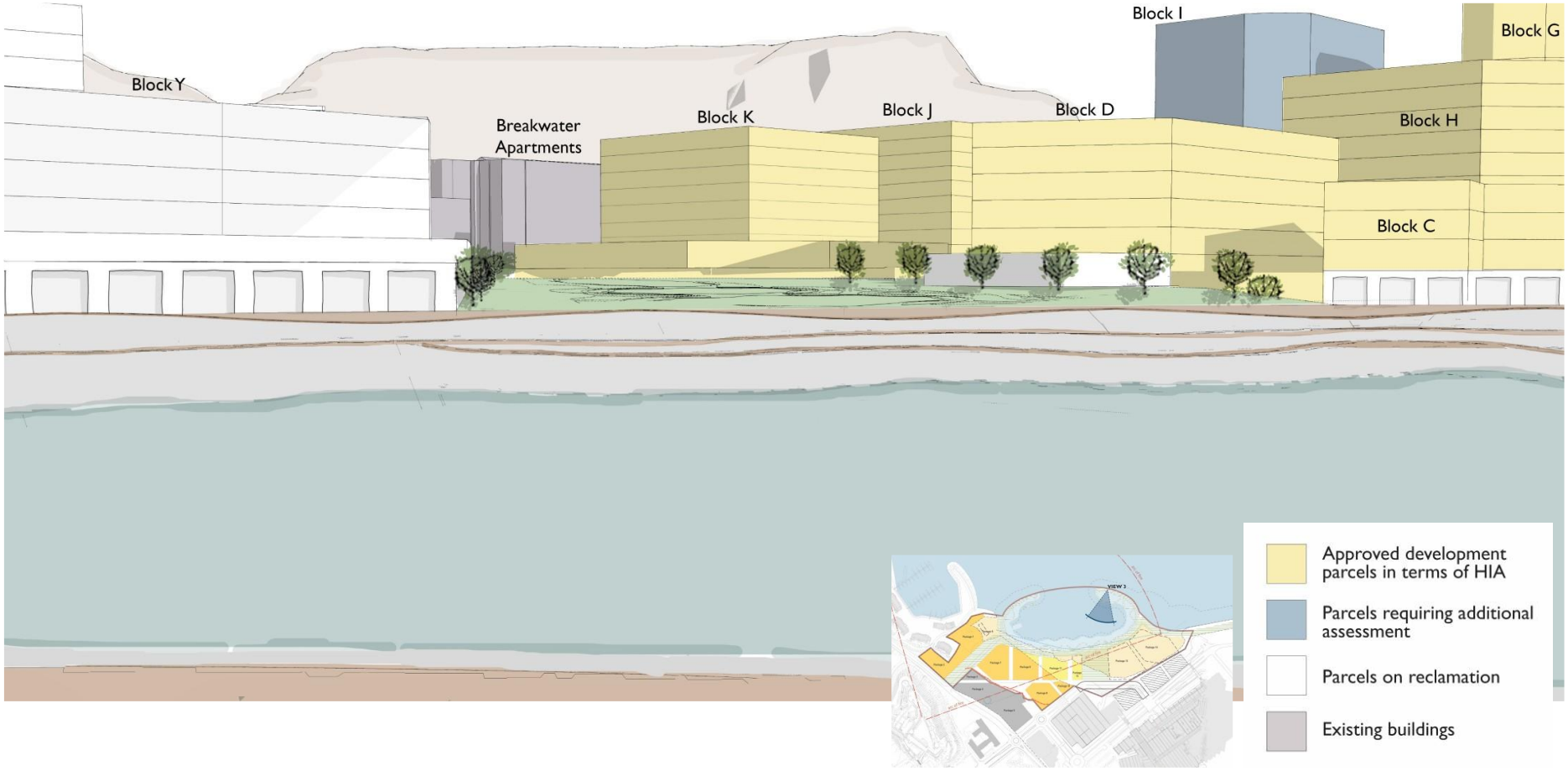


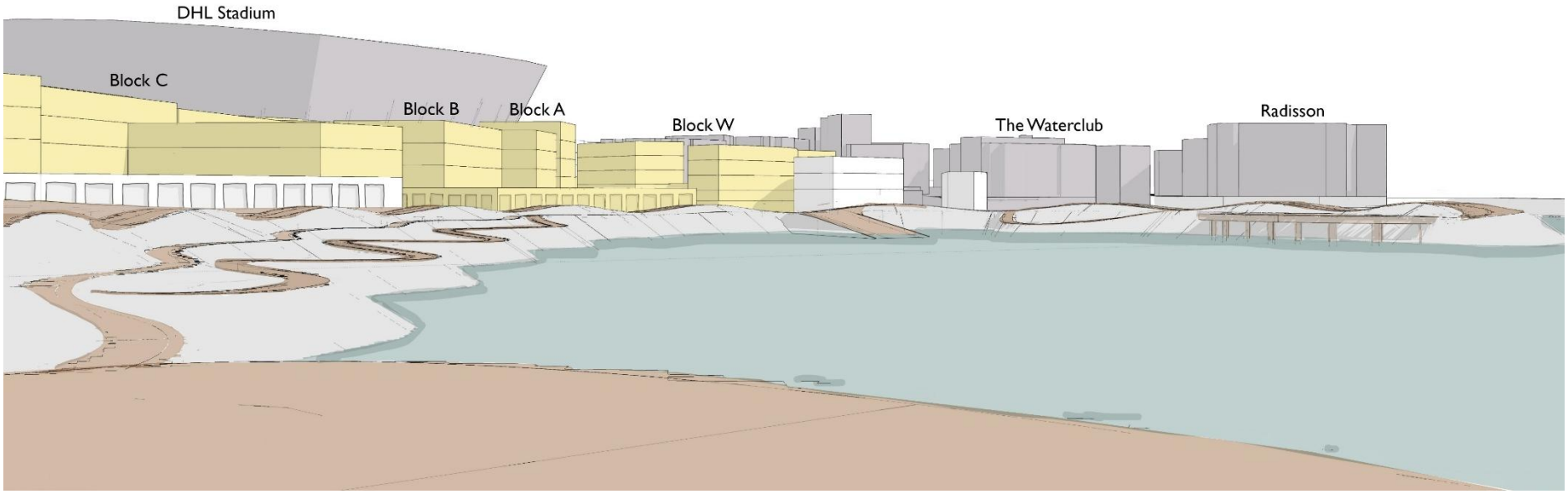
Figure 57: Indicative future view from Radisson Breakwater per current revised proposal.

Figures 58 to 62 below: Additional 3D renders illustrating impacts on Table mountain views and public space environment.



View from edge of Breakwater to mountain and water.





Modelled views looking west to the existing Cape Town Stadium, Water Club and Radisson Hotel buildings in grey, proposed buildings in yellow

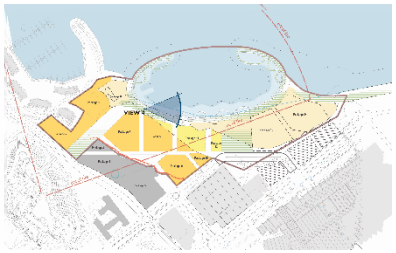
Existing view looking west to the Cape Town Stadium, Water Club and Radisson Hotel buildings

Approved development parcels in terms of HIA

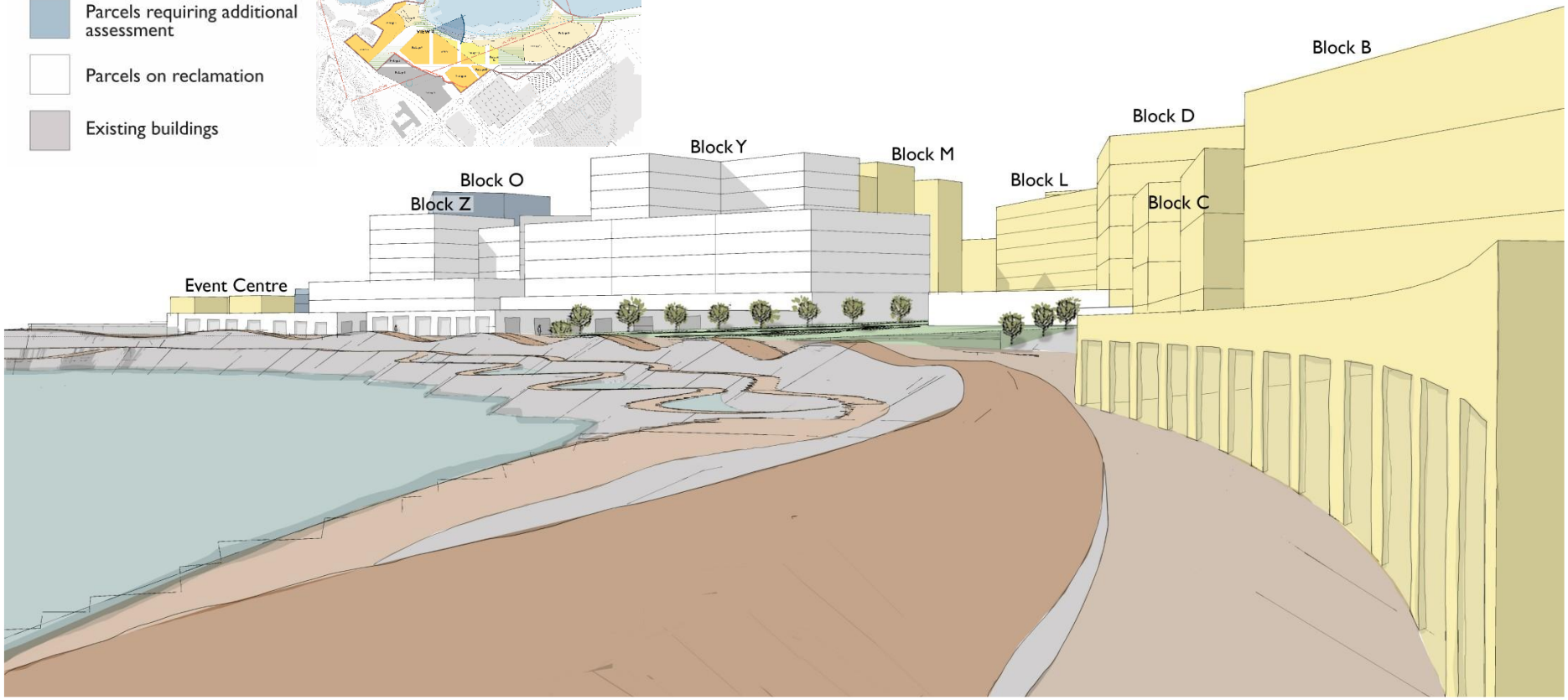
Parcels requiring additional assessment

Parcels on reclamation

Existing buildings



From A looking East Look and feel of public environment



14.2.4 Access to the slipway

The intention is to replace the existing slipway, taking current standards and the functional requirements of the vessels into consideration, with a new publicly accessible slipway.

The slipway will need to accommodate the following users:

- Recreational and commercial fishing boats
- Recreational activities, such as:
- Jet skiing
- Surf skiing
- Kayaking

The geometry of the slipway will be governed by the requirements of the recreational and commercial fishing boats.

The slipway will have a width of 10 meters, providing two traffic lanes for users, and a slope of 1:8. The surface of the slipway will have a rough texture to enhance grip and prevent slipping. A kerb will be provided down each side of the slipway, as well as at the seaward end, to prevent users from driving off the slipway into deeper water.

A walk-on jetty will be provided adjacent to the slipway to allow users to temporarily moor up against while launching or retrieving their boat. The jetty will be accessed from land via a gangway designed to accommodate tidal variation and wave action

Ground floor accommodation will be made for the facilities required for the management of the slipway.

Whilst not detailed in the UDG or Development Controls, should development proceed in accordance with this information from V&AW, the heritage indicator has been satisfied and impacts are expected to be Low.

The new slipway is intended to be constructed before the existing slipway is de-commissioned. Access is therefore anticipated to be uninterrupted, with appropriate construction mitigation measures in place. should development proceed in accordance with this information, impacts to ocean-going users are expected to be Low.

14.2.5 Public pedestrian access to the shoreline

Provision for public pedestrian 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.

The current coastline will be extended by the creation of new revetments extending into the sea to create a protected bay. These revetments will be more visible and add to the coastal views, could enhance the scenic resources of the area providing opportunity for a variety of coastal activities open to the public. They will also provide opportunities to view the important landforms of Table Mountain, Devils Peak and Signal Hill.

The Urban Design Guidelines and Granger Bay Development Controls make explicit and considered provision for public access from Beach Road to the shoreline (by way of the 30m corridor and Granger Bay Boulevard, together with other internal streets). The continuity of the coastal corridor is provided for with public access and visual amenity (views of mountain and sea). The guidelines make appropriately sensitive provision at the level of principle for the management of building height, massing and edges in relation to the public realm.

The wider podiums (with upper storeys set further back) along the shoreline, the interactive facades and the wider, landscaped public space between buildings and the water provide some relief to potential visual implications along the shoreline.

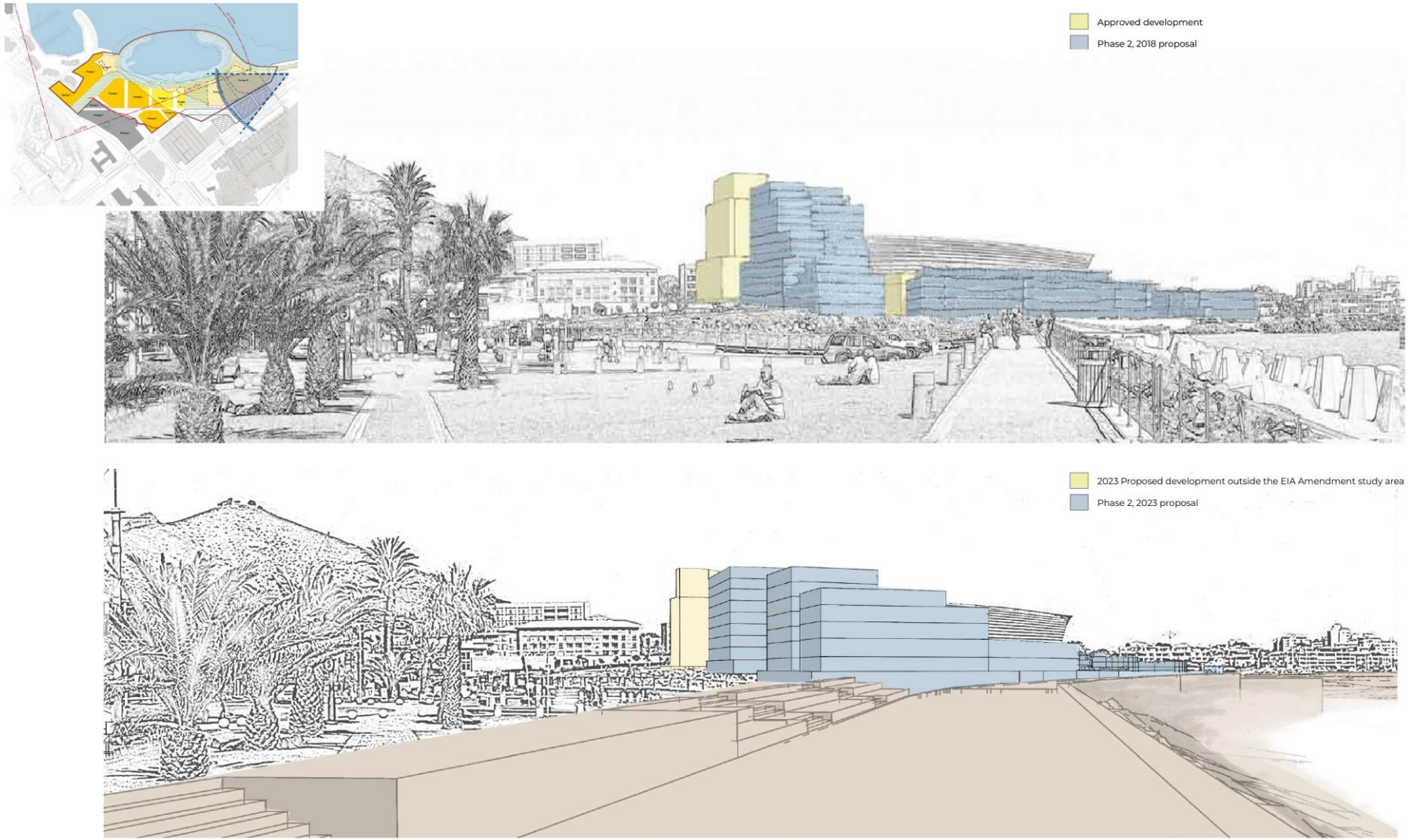


Figure 63: Public Open Space at the northern end of Granger Bay Boulevard.

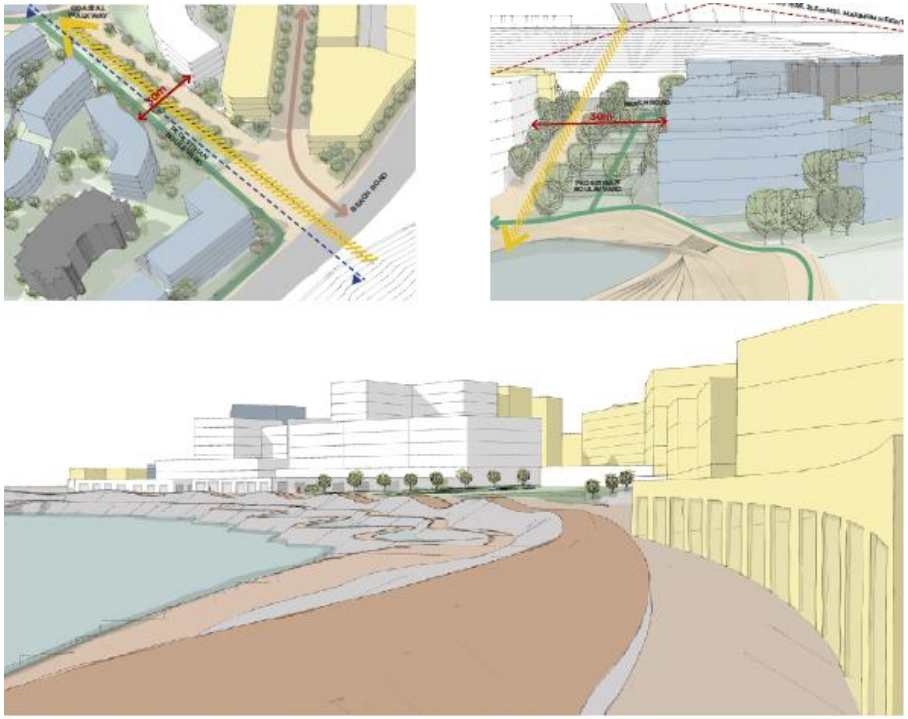


Figure 64: The pedestrian boulevard linking Beach Road to the slipway and coastal walkway (top) and the coastal walkway adjacent to building podiums, with interactive street interface, landscaped waterside and access to the V&A and public open space at Granger Bay Boulevard, are positive public places

The visual connection to the sea is seen as a high priority to maintain important vistas and sightlines across Table Bay. This includes views from Beach Road where the wall-effect of buildings needs to be minimised, as well as the proposed view corridors in front of Fort Wynyard and down Granger Bay Boulevard. Views of the near shoreline, as well as the bay are important, and any building development needs to allow for visual permeability to the sea.

Views from Beach Road to Table Bay are however currently restricted to Haul Road, in front of Fort Wynyard, and from Granger Bay Boulevard. Topography and existing temporary buildings obscure views of the coast and Table Bay between these two corridors. The proposed corridor in front of Fort Wynyard will allow for views of Table Bay, the new boat slipway, revetments and protected bay. The views down Granger Bay currently only has sight of Table Bay. New building podiums in Packages 13 and 14 could reduce these views.

The Preferred Alternative provides for public access and for interactive facades along Beach Road, the Fort Wynyard corridor, the coastal promenade and along Granger Bay Boulevard.

The following 3D drawings and Indicative section of the walkways are provided: Section AA and BB and public realm plan from the Urban Design Guidelines.

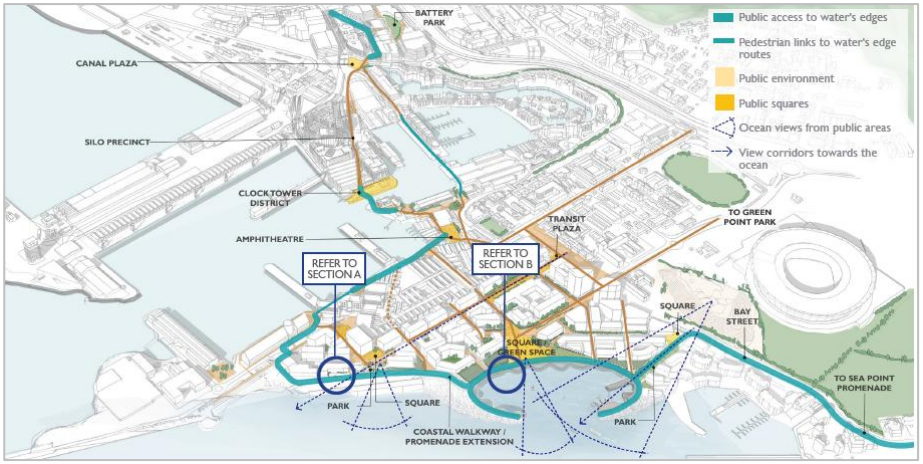


Figure 65: Illustrative development concept with notional connections to the water (harbours, canals, oceans)

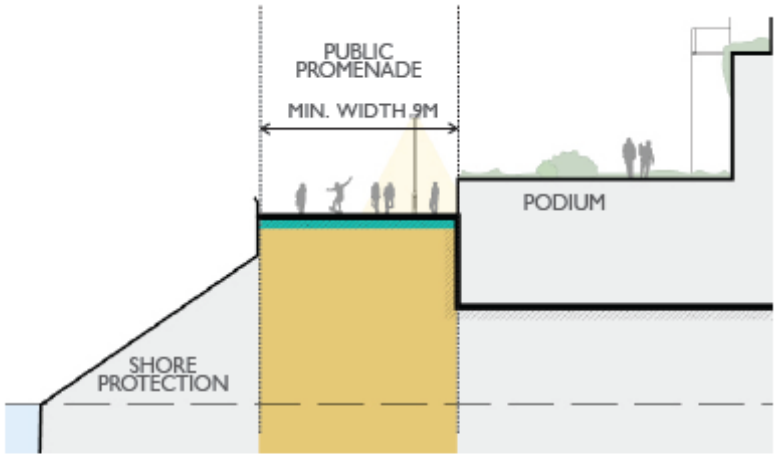


FIG 17 SECTION A: INDICATIVE SECTION ALONG THE PUBLIC OCEAN PROMENADE (NOT TO SCALE)

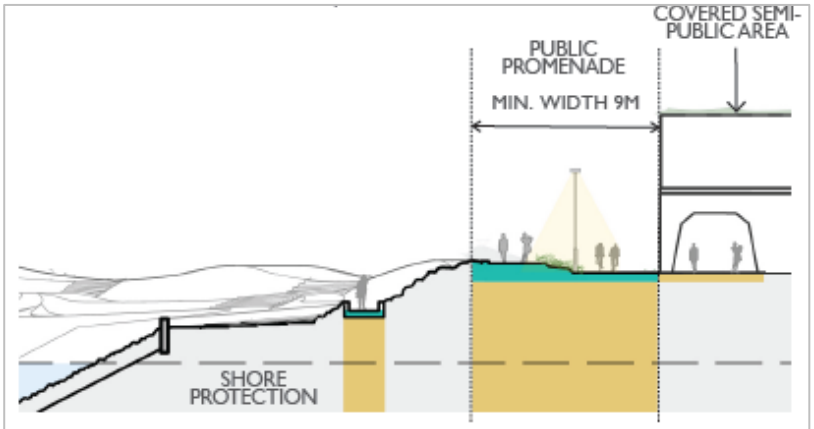


FIG 18 SECTION B: INDICATIVE SECTION ALONG THE PUBLIC OCEAN PROMENADE (NOT TO SCALE)

Figures 66, 67: Indicative sections of the walkways

Indicative conceptual renderings and information have been provided by the V&AW. In addition to the 9m walkway there are other public amenities such as tidal pools and steps down to the water. The diagrams below illustrate the proposed landscaping and paths between the main promenade and the sea. The landscaping would be designed to provide visual relief.

Figures 68, 69: Indicative illustrations of the proposed landscaping and paths between the main promenade and the sea.

The previous straight-line revetment scheme included a 20m wide green strip along the coastline and no commercial development on the reclaimed portion. The green strip was to be edged by a dolos revetment with no direct access to the water for the public.

The current scheme still responds to the original principles but provides for a more nuanced and 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 new bay, 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.

According to a preliminary Geotechnical Functional Requirements Report (PRDW, 2025), the eastern portion of the bay will include three tidal pools, whereas the western portion of the bay will include the slipway.

An exposed aggregate finish, as is presently utilised in the V&A Waterfront, is suggested for the walkway. The final finish to be applied will be dependent on local availability. Plain, unreinforced concrete units will be used to construct the pool slab, retaining walls, and staircase units.

Unlike the previous scheme where no development was envisaged on the reclaimed portion of land, the current 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. This is confirmed and supported.

The Development Guidelines include principles for setbacks and interface conditions as follows:

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.

Whilst not detailed in the UDG or Development Controls, should development proceed in accordance with this information from V&AW, the heritage indicators have been satisfied and impacts are expected to be High, positive.

However, given the significance of this indicator, and the very high level conceptual proposals, it is proposed that SDPs for parcels along the coast will be required to show how public access is accommodated (including landscaping) and the relationship between the adjoining buildings and the public realm articulated further, for assessment of conformity against the indicators and principles of development established in this report and the attached urban design guidelines and development controls.

14.2.6 Contextual informants

The Urban Design Guidelines include street network design intentions and guidelines which optimise visual and physical permeability and connections to the sea.

The development guidelines on Pages 3 and 4 of the Granger Bay Development controls are designed to avoid monolithic, homogenous massing in the development area. Controls are provided for the scaling of heights; modulating facade treatment and fragmentation of form and massing of buildings to reduce the scale of buildings.

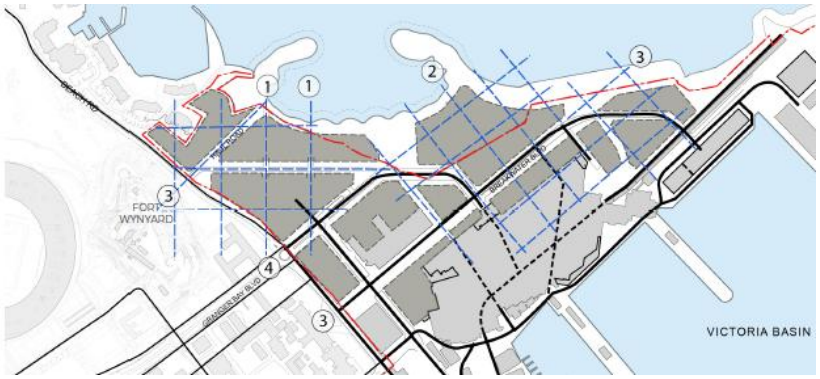


Figure 70: Proposed Extended Street Networks And Blocks (UDG)

Given its identification as a peripheral area outside of the "arc of fire", the UDG and Development Controls addresses any contextual heritage considerations appropriately and any further oversight by the heritage authority of, for example, typological response of architecture, should not be required and are more appropriately managed by the CCT at SDP stage.

However, there would be an increase in the number of light in the area generated by the lighting of buildings, streets and outdoor spaces. Changes to the microclimate in the form of building shadows, wind-funnelling and noise can be expected. This increase in lighting in the area is still relevant and remains a potential issue.

14.2.7 ICMA factors

Section 63 of the ICMA states that where an environmental authorisation in terms of Chapter 5 of the National Environmental Management Act is required for coastal activities, the competent authority must take into account various specified factors over and above the standard considerations, including:

- Consistency with the purpose of coastal public property and coastal access,
- Socioeconomic 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.

With regard to the heritage considerations, public use and access to coastal amenities in this proposed project is an important design and development element and impacts are expected to be high positive.

14.2.8 Cumulative Impacts

Along with the approved Phase 1 development, proposed developments in Granger Bay will be additive in nature and potentially High in significance, although cumulative heritage related impacts are expected to be Moderate given the limited heritage significance.

14.3 Conclusion

With some exceptions, the Urban Design Guidelines and Granger Bay Phase 2 Development Controls provide sufficient guidance on the relatively limited matters of heritage concern.

The core, buffer and periphery defined in the draft CMP correlate with the degree of visual intrusion that might be anticipated across the V&AW, with the core area being the most sensitive. However, the proposed development of Granger Bay could only be classified as being visually intrusive by these standards, as the current context is open and largely underutilized space.

At the largest scale, that adherence to the existing townscape character of the surrounds would ensure an acceptable degree of visual impact. The assessment of new development from the distant Signal Hill viewpoint outside the site reveals a scaling down of height from the city and the ribbon of blocks of flats along Beach Road in Greenpoint towards the lower- and fine-scaled historic core of the V&A Waterfront. This approach is judged to be acceptable as it ensures a degree of visual absorption into the receiving environment, by placing taller structures and additional bulk adjacent to areas of

the city where they are already existing, and thus ensuring contextual continuity.

The proposed 2025 Granger Bay scheme built development has a greater footprint than the 2019 scheme, because there is development proposed on land to be reclaimed. 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 buildings in the 2025 scheme are generally lower with the higher buildings adjacent to Granger Bay Boulevard where they are in scale to the width of the road and cascade in height towards Table Bay. More open space is provided on podiums and in internal courtyards. Heights adjacent to the coastal walkway are lower and the facades are interactive. The building height restriction in the 'arc of fire' from Fort Wynyard remains the same for both schemes. As does the 30m wide corridor in front of Fort Wynyard down to the sea and Table Bay is provided in both schemes, as well as Granger Bay Boulevard.

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 Waterfront Hotel in the east, together with an extensive coastal park.

Access for the public and fisherman to launch boats and water craft from a new slipway is unimpeded.

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

While the footprint of the 2025 proposed development is bigger, 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 proposed in the 2019 scheme are now part of the Granger Bay Development Controls.

Further Impact Assessment Tables can be found in Annexure F.

15. Mitigation

15.1 Pre-Colonial Archaeology

Fragmentary survivals of pre-colonial archaeological material (principally coastal shell middens) are possible where undisturbed coastal sediments survive, even where currently buried under later landfill or development.

It is recommended that:

- Where new development or earthworks have the potential to reach the depth of the former, historical land surface, the work is archaeologically monitored.
- Should pre-colonial archaeological material be encountered, this will need to be archaeologically assessed by a suitably qualified archaeologist. Archaeological material is the property of the state and may require excavation and curation in an approved institution. If found, such material may not be removed or disturbed until inspected and, if required, mitigated by an archaeologist.

No graves or burial grounds have been recorded within the EIA project area, but it is possible that unmarked burials could be present in the same areas of the site that may be archaeologically sensitive. Such, usually pre-colonial graves, are an extremely sensitive and often contested heritage resource, and it is generally impossible to predict their presence in advance of development.

It is, therefore, recommended that:

- In the event of the discovery of human remains, work in the affected area must cease immediately, the find must be made secure but left in situ, and HWC and an archaeologist must be

informed so that the find can be assessed and arrangements can be made for its mitigation.

15.2 Terrestrial Historical Archaeology

The historical structures recorded as being present in the EIA project area and described above appear to have been demolished and removed in 1997/8.

As such, the area is of very low historical archaeological significance, and no specific mitigation is recommended except, as indicated above, that where new development or earthworks have the potential to reach the depth of the former, historical land surface in the areas indicated in Figure it is recommended that this work is archaeologically monitored.

15.3 Submerged Prehistory

Although there is the potential for the presence of submerged prehistoric archaeological material within the maritime portion of the EIA project area, this is likely to be extremely low. The nature of the proposed work in this area – depositing of fill on the seabed – also means that the direct interventions into the seabed that might encounter such material will not take place.

Mitigation measures in respect of submerged prehistoric archaeology is thus relevant and none are recommended.

15.4 Historical Shipwrecks

No wrecks have been previously reported in the EIA project and overall, the likelihood of encountering historical wrecks in the area is low.

Because of the uncertainty introduced by the vagueness of contemporary historical descriptions of maritime casualties in the Mouille Point and Granger Bay area, it is recommended that:

- A geophysical survey of the seabed, (sidscan sonar, multibeam bathymetry and magnetometry), is conducted in the project area prior to any land reclamation activities, to confirm whether there are shipwreck or other heritage sites present.
- The results of the geophysical survey should be reviewed by a suitably qualified archaeologist.
- If a wrecks or wrecks are present in the area SAHRA must be notified immediately, and the site/material must be assessed by a suitably qualified archaeologist, after which a decision can be made about the need for any mitigation measures, which may include site recording, sampling/excavation, and potentially removal and recovery.

It is also recommended that:

- Any future excavations within the Development of the Granger Bay Precinct and Reclamation of Land at the V&A Waterfront project area through existing landfill, seaward of the historical alignment of the shoreline, to levels that may intersect with the former seabed must be subject to archaeological monitoring, with the necessary contingencies in place to allow the mitigation of shipwreck remains, should they be encountered.

The mitigation measures indicated above should be included in the project Environmental Management Programme (EMPr).

15.5 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 Water Club's Dover Apartment building, should be articulated such that they allow views towards Table Bay and Table Mountain.

15.6 Views of Table Bay down Granger Bay Boulevard to be retained.

The podiums of the building Blocks Y and Z in Packages 13 and 14 must 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. The final level of the breakwater is yet to be determined and may obscure this view to some extent.

Figure 71: Existing view of Table Bay down Granger Bay Boulevard must be retained when buildings in packages 13 and 14 are developed.

15.7 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.

15.8 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 72: Preferred revetment using large rocks (MALA)

15.9 Building Forms & 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.

15.10 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.

15.11 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.

16. Socio-economic benefits

Cape Town, and the V&A Waterfront specifically, remains a cornerstone of the Western Cape's tourism economy. The Granger Bay Precinct forms part of this highly visited and economically significant node, which consistently ranks among the top points of interest (POIs) for both domestic and international visitors. According to Wesgro's 2022 Cape Town Visitor Trends Report, the V&A Waterfront was the most visited attraction by both domestic and international tourists indicating its sustained draw and economic value within the city's visitor economy (WESGRO, 2023).

The proposed Granger Bay mixed-use development, which includes public realm enhancements and improved coastal access, is positioned to strengthen the area's tourism appeal even further. By extending the promenade, enhancing pedestrian infrastructure, and integrating retail and leisure spaces, the development directly supports the V&A Waterfront's position as a tourism magnet. Further, the inclusion of accessible public spaces aligns with key tourism trends prioritising walkability, coastal recreation, and experiential travel.

The economic impact assessment estimates that estimates that the construction phase will generate a total production output of approximately R24.2 billion and contribute R8.8 billion to GDP. This substantial capital expenditure is expected to stimulate both the local and regional economies, even during the limited timeframe of the construction period. The resulting activity will also support household incomes by nearly R4 billion, with benefits distributed across the construction, supplier, and service industries

Once the construction of the proposed development is complete further impact on the economy and community will be created through operational functions. The results suggests that the operational phase of the proposed development will impact total production by approximately R691.8 million and contribute around R322.3 million to GDP annually.

In terms of employment, the construction phase will create approximately 26 929 jobs through direct, indirect, and induced mechanisms. The operational nature and scale of the proposed development will positively impact the socio-economic environment through the creation of sustainable employment opportunities provided that OPEX levels remain as projected in the SAM modelling. An estimated total of 822 permanent jobs will be created through direct, indirect, and induced mechanisms as a result of the proposed development.

The proposed development is expected to generate a range of socio-economic impacts, both positive and negative, across the construction and operational phases. The net positive effects, particularly in terms of employment creation, income generation,

tourism growth, public space improvements, and long-term economic diversification are anticipated to outweigh the potential negative effects, which are mostly temporary and manageable.

17. Public Consultation

The registered Conservation Body with an interest in this area is the Green Point Ratepayers' & Residents' Association. They, together with SAHRA, the City of Cape Town Heritage Resources Management (CCT HRM), the Oceana Power Boat Club, the Water Club Marina Home Owners Association, the South African Defence Force Logistics Division and a representative of the Cape Garrison Artillery and Gunners Association and other I&APs identified through the NEMA process were be asked to comment on the Draft HIA.

Proof of consultation and comments received are included in full in Annexure G. No heritage related objections were received.

Comment: The Built Environment Committee of the Green Point Residents and Ratepayers Association
Our only interest in this proposed development is protection of the Arc of Fire. Please provide assurance so that we no longer need to be involved.

Response:
The Arc of Fire was a key informant in the design of the proposed development and has been accommodated in full.

Comment: A number of individual users of the Oceana Power Boat slipway expressed concerns regarding continued access to the ocean.

Response:
The V&A Waterfront is the owner of the properties within the site footprint, with areas below the highwater mark previously leased from the national ports authority. Any lawful lease agreements or management arrangements currently in place will be discussed with tenants and appropriately transitioned.

A new slipway within the new bay will be constructed to replace the existing slipway at Oceana, and construction plans will provide for continuous access to a functioning slipway throughout construction. Functional requirements of the marine economy have also been considered, and space has been allocated at the ground floor level near the proposed new slipway for rentals, clubhouses, equipment storage and other facilities. Slipway access and parking requirements have informed the design, specifically regarding space allocation for trailer parking.

Slipway access has been specifically considered in the EIA. The mitigation measures proposed include the complete construction, commissioning, and testing of the new slipway to a standard of full equivalent functionality (including launch and retrieval capability, approach, lighting, and associated facilities) and confirming this with a joint inspection before any restriction or closure of the existing slipway is implemented.

Comment: Gunner Kevin P. Ashton JCD National Chairman Gunners' Association of South Africa
Provided corrections to current operational status of Fort Wynyard, noted work to beautify the area, and was pleased that the "Arc of Fire" has been taken into the plan.

Response:
Corrections have been made accordingly.

Comment: Meagan Nell
Every South Africa citizen has the right to access our beaches. This development is a commercialized project for personal profit and has absolutely no benefits for the local people. Privatizing land along our coast is a direct attack to our rights as citizens. We should not have to

pay or even ask permission from a private land owner to access spaces previously open to the public.

Response:
Provision is made for public amenities within the design of the proposal along the coastal walkway, the breakwaters, as well as a public coastal park. As set out in the impact assessment the proposal is that public access will be possible on the same basis as the remainder of the V&A Waterfront, and facilitating public access to the coastline is a key part of the proposal.

Coastal public property (land below the high water mark) remains the property of the state, and it is the applicant's intention to apply for a coastal lease or coastal lease permit to provide for management of the proposed breakwaters and coastal infrastructure.

Access along the breakwaters may need to be controlled during extreme weather conditions to ensure public safety.

Comment: City of Cape Town Heritage Management Section
As a section 38(4) HIA application was approved on 28 October 2024 for the entire V&A Waterfront for additional bulk rights and rezoning of the site to Mixed Use 3(MU3), E&HM (Heritage) won't be submitting a further comment with respect to the current EIA. The previous HWC endorsement related to most of the parcels in the current study area and included the endorsement of identified heritage significance and indicators.

However, the following was noted:
Omission of 2 conditions: HWCs support for the 2015 HIA was subject to conditions, of which the last two of the 10 conditions have not been included in the Granger Bay Reclamation 2026 HIA.

Ensure that the full list of mitigation measures from the 2015 RoD are itemised and included in this HIA and the EIA mitigation measures. The HIA notes that the essential and optional mitigation measures should all be considered essential mitigation measures.

Response
The conditions referred to are listed on pages 67 – 68 of this report. It is correct that the two mitigation measures relating to archaeology were not included on page 68 and this has now been amended.

However, with reference to the recommendation that all previous conditions relating to the 2015 approval (including the two above mentioned) be included in the mitigation measures of this report:

As this HIA states the mitigations and conditions included in said Final Comment 2015 have in the main now been included in the UDG and Granger Bay Phase 2 Development Controls. This includes, with reference to the extracts right and below:

Mitigation 2: p4 of the Development Controls:
- 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

Conditions 1 – 3; 6 & 7: p2, 3 and 4 of the Development Controls
- A visual corridor of 30m wide from Fort Wynyard to the coast is provided to allow for a visual connection between the historic Fort Wynyard and the ocean.
- 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

- 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.
- The use of balconies, pergola's, screens and or roof over hangs should be promoted to articulate building facades

Condition 4:
Whilst certain inferences can be extrapolated from the UDG and DC regarding the public coastal walkway and public spaces, aside from the 9m wide walkway itself, all other details are notional and the setbacks from buildings not explicitly detailed.

Condition 5:
The Notional Precinct Plan includes provision for the slipway but no details.

Since approval of the UDG and Granger Bay Phase 2 Development Controls is proposed to be approved as part of this HIA recommendations, it would be moot to restate these conditions.

Moreover, this development is entirely different and must be considered on its own merits. The concerns expressed previously by HWC were incorporated, in principle and where relevant to the current proposal, in the heritage indicators. The proposals were assessed against them, and 15 project specific mitigations provided on pages 90 – 93 of this report, including archaeological mitigations. These are considered more appropriate to the proposal under consideration; the development package proposed to be approved; and the assessment of impacts thereof. The mitigation measures in this Report and proposed conditions of approval stand.

18. Recommendations

It is recommended that Heritage Western Cape:

- Endorses this report as having met the requirements of Section 38(3) of the NHRA;
- In terms of Section 38(8) of the NHRA provides Final Comment to support the Granger Bay Reclamation Precinct Development Plan; Urban Design Guidelines and Granger Bay Phase 2 Development Controls described in Annexure F of this report, subject to the following:
  - implementation of mitigations outlined in Section 15 (pages 90 to 93), which should be included in the project Environmental Management Programme (EMPr);
  - Details of the coastal public open space and access, including the promenade, the public amenities relating to the revetments and bay; and Breakwater Park, and including the related building setbacks, form and massing, are to be assessed for each precinct at SDP level for conformity with the indicators, guidelines and controls proposed in this HIA.

ANNEXURE A: SPECIALIST DETAILS, EXPERTISE AND DECLARATION

Company Name	Cindy Postlethwayt
Resource Description	Heritage practitioner
Professional Qualification	B Soc Sci; MCRP
Years Experience	15 years heritage
Professional Registrations	APHP
B-BBEE status	Exempt Micro-enterprise (Level 4)

Key Experience / Training	Cindy Postlethwayt is a qualified Town and Regional Planner and APHP Accredited Professional Heritage Practitioner. She has 35 years experience, with a specialist focus over the last 15 years in heritage work. She worked at the City of Cape Town for 13 years, 11 of which in a management capacity, covering the fields of development management; spatial and transport planning, strategic planning and the Olympics. She has been an independent consultant for 20 years, with a broad range of applications. Her client list has included local, provincial and national governments, para-statals, community based organisations and private sector investors.

TABLE OF RELEVANT WORK EXPERIENCE:

Chairperson: Heritage Western Cape Impact Assessment Committee (IACom) Dec 2014 to Nov 2016

Committee Member: Heritage Western Cape Impact Assessment Committee (IACom) 2013 – Dec 2014

Heritage Impact Assessments: Approximately 65, major HIAs

Section 27 and 34 applications: Approximately 38

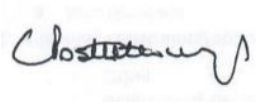
NID applications (stand alone, not part of an HIA): Approximately 82

Appeals (HWC & Tribunal): 9

DECLARATION BY THE SPECIALIST

I, Cindy Postlethwayt, declare that –

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



Cindy Postlethwayt, heritage consultant
Date 12.3.2026

ANNEXURE B: Previous approvals and 2025 RNID

ANNEXURE C: Archaeological Impact Assessment

(separate e-file)

ANNEXURE D: Visual Impact Assessment

(separate e-file)

ANNEXURE E: Criteria heritage significance

Cultural significance is defined as: aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance. The national estate includes, inter alia, places, buildings, and structures of cultural significance; historical settlements and townscapes; and landscapes and natural features of cultural significance (NHRA)

Section 3(3) of the NHRA identifies criteria for assessing the significance of a place. In respect of those values relevant to this property, a place has heritage significance, inter alia, because of:

a) Historical value
- It is important in the community or pattern of history (including in the evolution of cultural landscapes and settlement patterns; association with events, developments or cultural phases) or illustrates an historical period
- It has a strong or special association with the life or work of a person, group or organisation of importance in history
- its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- It has significance relating to the history of slavery

b) Architectural value
- *i.* It is significant to architectural or design history or is the work of a major architect or builder
- *ii.* It is an important example of a building type, style or period
- *iii.* It possesses special features, fine details or workmanship

c) Aesthetic value

It is important in exhibiting particular aesthetic characteristics valued by a community or cultural group (including its contribution to the aesthetic values of the setting demonstrated by a landmark quality or having an impact on important vistas or otherwise contributing to the identified aesthetic qualities of the cultural environs or the natural landscape within which it is located)

d) Social value
- *i.* It is associated with economic, social or religious activity
- *ii.* It is significant to public memory
- *iii.* It is associated with living heritage (cultural traditions, public culture, oral history, performance or ritual)

e) Spiritual value
- *i.* It is associated with religious activity and/or phenomena
- *ii.* It is significant to a particular group relating to spiritual events and/or activities

f) Linguistic value
- *i.* It is associated with the custodianship and/or sustainability of a particular language or events associated with that language
- *ii.* It is significant to a particular group relating to the evolution and/or dissemination of a particular language

g) Technical/Scientific value
- *i.* Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage
- *ii.* Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- *iii.* Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- *iv.* It is important to archaeology, palaeontology, geology or biology

The grading of heritage significance is based on the three tier grading system used in the NHRA and HWC's guidelines "Grading: Purpose and management Implications" (16 March 2016).

ANNEXURE F: Development proposal

(separate e-file)

ANNEXURE G: Impact Assessment Tables

Alternative: No Go	
PLANNING, DESIGN AND CONSTRUCTION PHASE HERITAGE IMPACTS	
Potential impact and risk:	**N/A**
OPERATIONAL PHASE HERITAGE IMPACTS	
Potential impact and risk:	Degraded site and coastal environment
Extent	Local
Intensity	Low - Medium
Duration	Temporary – short term
Degree to which the impact can be reversed	High
Degree to which the impact may cause irreplaceable loss of resources:	Replaceable
Probability of occurrence:	Unlikely
Significance rating of impact prior to mitigation	Medium
Status	Negative
Confidence	High
Significance rating of impact prior to mitigation	Low

Preferred Alternative:	
PLANNING, DESIGN AND CONSTRUCTION PHASE HERITAGE IMPACTS	
Potential impact and risk:	Loss of user access to coastline (ocean-going)
Extent	Local
Intensity	High
Duration	Short term
Degree to which the impact can be reversed	High
Degree to which the impact may cause irreplaceable loss of resources:	Moderate
Probability of occurrence:	Unlikely
Significance rating of impact prior mitigation	Medium
Status	Negative
Confidence	High
Significance rating of impact after mitigation	**Low**
PLANNING, DESIGN AND CONSTRUCTION PHASE HERITAGE IMPACTS	
Potential impact and risk:	Loss of pedestrian access to coastline (physical)
Extent	Local
Intensity	High
Duration	Short term
Degree to which the impact can be reversed	High
Degree to which the impact may cause irreplaceable loss of resources:	Moderate
Probability of occurrence:	Probable
Significance rating of impact prior mitigation	Medium
Status	Negative
Confidence	High
Significance rating of impact after mitigation	**Medium**
OPERATIONAL PHASE HERITAGE IMPACTS	
Potential impact and risk:	Visual, physical or design implied constraints on pedestrian access to coastline
Extent	Local
Intensity	Medium-high
Duration	Permanent
Degree to which the impact can be reversed	High
Degree to which the impact may cause irreplaceable loss of resources:	Moderate
Probability of occurrence:	Low - Moderate
Significance rating of impact prior to mitigation	High
Status	Negative
Confidence	High
Significance rating of impact after mitigation	**Low - Medium**

ANNEXURE H: Public Participation

To be completed following conclusion of public participation