



Addendum to the Comments and Responses Report for the Draft EIA Report

Proposed Granger Bay Precinct Development at the V&A Waterfront

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

DATE: 23 July 2026

PREPARED FOR
V&A Waterfront Holdings Pty (Ltd)



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The comment above was received after the commenting period on the draft EIA report, and is an addendum to Appendix M4 – the Comments and Responses Report for the Draft EIA.

Date	Method	Name	Interest	Comment / Query	Response
2026/05/26	Email	DEADP Development Management (Region 1) Kraigen Govindasamy and Eldon van Boom		COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REPORT FOR THE PROPOSED DEVELOPMENT OF THE GRANGER BAY PRECINCT ON ERVEN 173712 AND 177853, V&A WATERFRONT 1. The draft EIA Report dated 19 March 2026 and received by this Department via electronic mail correspondence on 19 March 2026, and this Directorate's acknowledgement thereof dated 30 March 2026, refer. 2. This letter serves to provide comments on the draft EIAR. 3. Comment on the draft EIAR is as follows:	Noted.
				3.1. Declaration of Interest 3.1.1. Please be advised that signed and duly dated copies of the Applicant's and EAP's declarations of interest must be submitted with the EIA Report.	Please see pages 349 and 350 of the amended draft EIA for the Applicant's and EAP's declarations, respectively.
				3.2. Specialist Studies 3.2.1. This Directorate notes that the following specialist studies are included in the draft EIA Report: 3.2.1.1. The Climate Change Impact Assessment conducted by SRK Consulting (dated March 2026); 3.2.1.2. The Heritage Impact Assessment conducted by Cindy Postlethwayt (dated March 2026); 3.2.1.3. The Archaeological Impact Assessment prepared by Terramare Archaeology (dated 12 March 2026); 3.2.1.4. The revised Marine Impact Assessment compiled by Anchor Environmental Consultants (dated 2026); 3.2.1.5. The Oceanographic Impact Assessment (compiled by WML Coast (Pty) Ltd (dated 16 March 2026); 3.2.1.6. The Marine Mammal Specialist Report prepared by Dr Simon Elwen of Sea Search Research and Conservation (dated April 2025); 3.2.1.7. The Visual Impact Assessment prepared by Megan Anderson Landscape Architects (dated March 2026); 3.2.1.8. The revised Socio-Economic Impact Assessment (SEIA) compiled by Urban Econ (dated 2026);	Since the publication of the previous Draft Environmental Impact Assessment (EIA) Report in March 2026, substantial new information has been added to project documentation in response to comments received. The list of additional information provided with the amended EIA report is provided on page 3 of the Executive Summary.

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				3.2.1.9. The Functional Requirements Report compiled by PRDW (dated 12 November 2024); 3.2.1.10. The Transport Impact Assessment compiled by Motion Consulting Engineers (dated 16 March 2026); and, 3.2.1.11. The Stormwater Management Plan was prepared by Nadeson Consulting Services (Pty) Ltd (dated February 2026). 3.2.2. All specialist studies listed above have been reviewed and integrated into the impact assessment. No material contradictions were identified between specialist findings	
				3.3. Public Participation 3.3.1. You are hereby reminded that comments from Heritage Western Cape, the South African Heritage Resources Agency, SANPARKS, CapeNature, the Department of Water and Sanitation, this Department's Directorates: Coastal Management and Waste Management Licensing and the City of Cape Town must be included in the EIA Report. 3.3.2. Proof of the public participation process undertaken for the draft EIAR must be included in the final EIAR. 3.3.3. All comments received on the draft EIAR must be adequately addressed in the final EIAR, and the comments and responses report must be updated accordingly.	Proof of public participation undertaken will be provided to the Department with the Final EIA submission. Please see Appendix M for the Comments and Responses Report for each phase of the EIA process.
				3.4. Alternatives 3.4.1. The Environmental Assessment Practitioner (EAP) is required, in terms of the EIA Regulations, 2014, to identify and assess all reasonable and practicable alternatives. This includes, where feasible, the consideration of additional alternatives (such as site, layout, design or route alternatives, where applicable). Where such alternatives have not been identified or assessed, the EAP must provide a clear and reasoned motivation demonstrating that practical, technical, environmental and spatial constraints render additional alternatives unreasonable or infeasible. The Final EIAR must therefore clearly set out the basis on which alternatives were considered, and provide justification for the exclusion of any additional alternatives	Please refer to Section 2.7 of the Amended Draft EIA Report for a discussion of the alternatives considered in the iterative design process taken to arrive at the proposed Preferred Alternative. No other alternatives other than the No-Go scenario have been assessed, due to the factors outlined in detail in the amended Draft EIA.
				3.5. Confirmation of Services 3.5.1. This Directorate notes that confirmation of bulk services has been provided. Confirmation of bulk services capacity supports the feasibility and sustainability of the proposed development and reduces potential cumulative infrastructure impacts.	Noted.
				4. You are further reminded that in accordance with Regulation 23(1) of the NEMA EIA Regulations, 2014 (as amended), the EIAR	An extension to the regulated timeframe was requested from the

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				and EMPr must be submitted to this Directorate for decision-making within a period of 106 days from the date of the acceptance of the Scoping Report. The deadline for the submission of the EIAR is therefore 17 June 2026. 5. If, however, significant changes have been made or significant new information has been added to the EIA Report, the applicant/EAP must notify the Department that an additional 50 days (i.e. 156 days from the date of the acceptance of the Scoping Report by the Department) would be required for the submission of the EIA Report. The additional 50 days must include a minimum 30-day commenting period to allow registered I&APs to comment on the revised report and/or additional information.	Department in terms of Regulation 3(7) of the EIA Regulations, 2014 (as amended). This extension was granted on 10 June 2026. The extension was requested to allow for a public commenting period on the additional information provided with the Amended Draft EIA Report.
				6. Please note that the activity may not commence prior to an Environmental Authorisation being granted by the Department. It is an offence in terms of Section 49A of the NEMA for a person to commence with a listed activity unless the Department has granted an environmental authorisation for the undertaking of the activity. Failure to comply with the requirements of Section 24F and 49A of the NEMA may result in the matter being referred to the Environmental Compliance and Enforcement Directorate of this Department for further consideration. A person convicted of an offence in terms of the above is liable to a fine not exceeding R10 million or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment. 7. Kindly quote the abovementioned reference number in any future correspondence in respect of the application. This Department reserves the right to revise or withdraw comments or request further information based on any information received.	Noted.