Draft Basic Assessment Report

PROPOSED MIXED-USE DEVELOPMENT ON ERF 2187, THREE ANCHOR BAY, GREEN POINT

EIA REFERENCE: 16/3/3/6/7/1/A7/30/3025/26

PREPARED IN COMPLIANCE WITH THE REQUIREMENTS OF THE EIA REGULATIONS OF 2014, AS AMENDED, AND THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998), AS AMENDED

VERSION: DRAFT
DATE: June 2026

APPLICANT
City of Cape Town Property Development Branch

CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

For Public Participation
from 18 June 2026 to 20 July 2026

Written comments should be submitted to the Environmental Assessment Practitioner, Infinity Environmental, at the details below or online at www.infinityenv.co.za/3anchorbay

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DOCUMENT DETAILS

PROPOSED MIXED-USE DEVELOPMENT ON ERF 2187, THREE ANCHOR BAY, GREEN POINT: Draft Basic Assessment Report

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Report purpose

This report is prepared in compliance with the requirements of the Environmental Impact Assessment Regulations, 2014 (as amended) and is intended to:

- Present the proposed project and the need for the project.
- Describe the affected environment, to facilitate informed decision making.
- Provide an overview of the Basic Assessment process being followed, including public consultation.
- Assess the predicted positive and negative impacts of the project on the environment.
- Provide recommendations to mitigate negative impacts and to enhance the benefits of the project; and
- Provide for environmental management during the implementation of the project.

VERSION HISTORY

Date	Version
18 June 2026	Draft 1

DECLARATION OF EAP'S INDEPENDENCE

I, **Tarryn Solomon**, appointed by the City of Cape Town Property Development Branch as Environmental Assessment Practitioner for the Draft Basic Assessment Report, hereby declare that the information provided in this report and supporting documentation is complete and correct to the best of my knowledge; that other than fair remuneration for work performed in terms of this application I have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; that I have disclosed, to the Applicant, the specialist(s), the Competent Authority and registered interested and affected parties all material information that have or may have the potential to influence the decision of the Competent Authority; that I have ensured that information in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments; and that I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.

Tarryn Solomon BSc, Reg. E.A.P. 2019/1671,
Infinity Environmental (Pty) Ltd: Director & Principal EAP
18+ years' experience in environmental management (CV in Appendix A)

EXECUTIVE SUMMARY

Project Overview

The applicant, the City of Cape Town's Property Development Department, is proposing a high-intensity mixed-use development on Erf 2187 in Three Anchor Bay. The site is approximately 4.5 hectares in size, municipal-owned, and currently zoned as Public Open Space (OS2). The site is bounded by Sea Point Main Road (M61) to the south, Helen Suzman Boulevard and Beach Road (M6) to the north, and Three Anchor Bay Road to the west (Figure 1). These roads contribute to good connectivity in east-west directions to and from the site. MyCiTi and Golden Arrow bus services are available within walking distance to the site.

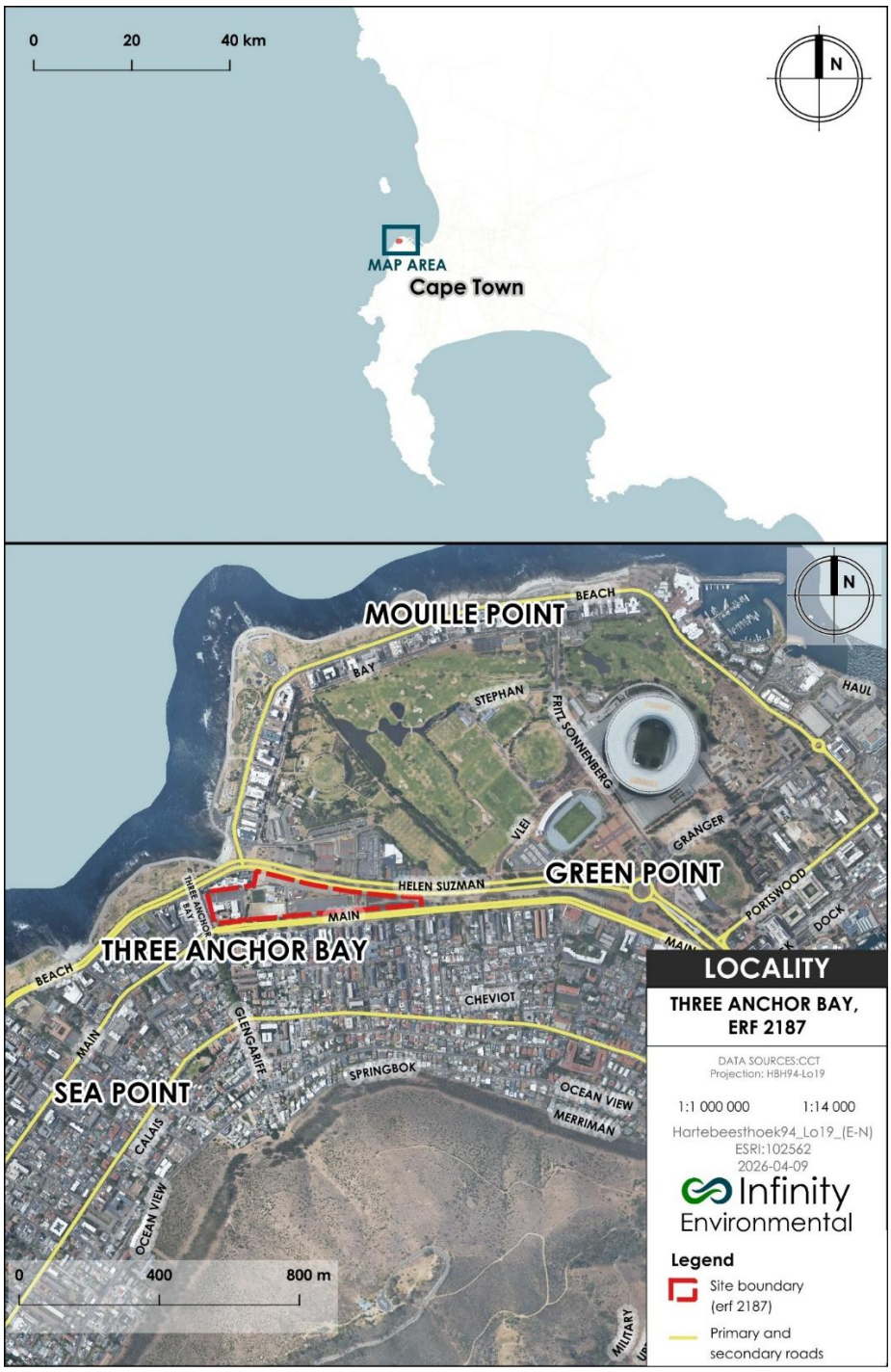


Figure 1: Site locality map

Notwithstanding the site's prime location, the site is currently underutilised. The bowling clubs that used to occupy significant land on the site are no longer active and the club houses are now being leased for various other low-intensity community uses or stand vacant. There are various sport and public recreational facilities in the vicinity of the site and the City's Spatial Development Framework earmarks the site for infill development that would ensure better utilisation of this well-located land parcel close the City Central Business District (CBD) and regional community and recreational facilities.

Council's in principle approval to transfer the site was obtained in March 2026 in terms of the 2008 Municipal Asset Transfer Regulations (MATR), and the intention is for the site to be disposed of via a competitive bidding process. The release of the site will take place before the statutory process is complete. However, the transfer of the site to the successful bidder will take place after the conclusion of statutory approvals in terms of National Environmental Management Act (NEMA) and the Municipal Planning By-law (MPBL) are concluded. The concept design includes residential, retail, commercial, civic and hotel development.

Environmental Assessment Process

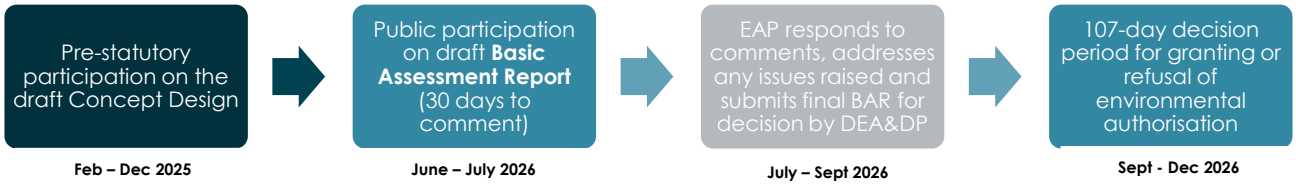
The proposed development requires environmental authorisation (EA) from the competent authority, the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP). The activities requiring an EA include those set out in the table below, listed in terms of the Environmental Impact Assessment (EIA) Regulations of 2014 (as amended) and the National Environmental Management Act, 1998 (Act no 107 of 1998), as amended (NEMA).

Table 1. Applicable Listed Activities

Listed activity	Description
Activity 19A of Listing Notice 1 (GNR 327 of 2017)	The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from – (i) The seashore; (ii) The littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or (iii) The sea **A portion of the site falls within 100 metres of the highwater mark of the Atlantic Ocean.**
Activity 67 of Listing Notice 1 (GNR 327 of 2017)	Phased activities for all activities – (i) Listed in this Notice, which commenced on or after the effective date of this Notice [;] or [(ii)] similarly listed in any of the previous NEMA notices, which commenced on or after the effective date of such previous NEMA Notices; **[where any phase of the activity may be below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold;]** (ii) Listed as activities 5, 7, 8(ii), 11, 13, 16, 27(i) or 27(ii) in Listing Notice 2 of 2014 or similarly listed in any of the previous NEMA notices, which commenced on or after the effective date of such previous NEMA Notices; where any phase of the activity was below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold. The proposed mixed-use development may be implemented in phases, with the sequencing of development components subject to the developer and refinement during the detailed planning and implementation stages. Although individual phases may fall below the thresholds of applicable activities, **the cumulative extent of the development footprint, including future expansions or extensions, may exceed such thresholds.**

Activity 4 of Listing Notice 3 (GNR 324 of 2017)	The development of a road wider than 4 metres with a reserve less than 13,5 metres. i. Western Cape i. Areas zoned for use as public open space or equivalent zoning; ii. Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or iii. Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority. **The proposed development will include new internal roads wider than 4 metres with a reserve less than 13,5 metres.** The site is currently zoned for Open Space 2: Public Open Space in the urban area of Cape Town. The proposed concept design includes provision for Class 5B (road reserve of 12 metres) and Class 5C (road reserve of 10 metres).
Activity 15 of Listing Notice 3 (GNR 324 of 2017)	The transformation of land bigger than 1000 square metres in size, to residential, retail, commercial, industrial or institutional use, where, such land was zoned open space, conservation or had an equivalent zoning, on or after 02 August 2010. f. Western Cape ii. Inside urban areas: (aa) Areas zoned for conservation use or equivalent zoning, on or after 02 August 2010 (bb) A protected area identified in terms of NEMPAA, excluding conservancies; or (cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act as adopted by the competent authority. **The proposed activity includes the transformation of land zoned as Open Space: Public Open Space (OS2), for residential, retail and commercial purposes.** The City of Cape Town's Municipal By-law (2015), includes the following primary use rights for OS2: • Public open space • Environmental conservation use.

In terms of the EIA Regulations, the proposed development requires Environmental Authorisation from the Department of Environmental Affairs and Development Planning (DEA&DP) and a Basic Assessment (BA) must be undertaken by an Environmental Assessment Practitioner (EAP). Infinity Environmental is the appointed EAP and is responsible for managing the BA process. Key stages in the BA process are shown below:



A Heritage Impact Assessment (HIA) has also been conducted and is available for comment as part of the Environmental Impact Assessment (EIA), in terms of section 38(8) of the National Heritage Resources Act, 25 of 1999. A land use planning application in terms of the City of Cape Town's Municipal Planning By-law is also required to obtain the development rights for the proposal.

Purpose of Basic Assessment Report

The objectives of this Basic Assessment process, according to the EIA Regulations, are to:

- Determine the legislative and policy context within which the activity is located and document how the activity complies with and responds to the policy and legislative context;
- Identify the considered alternatives, including the activity, location, and technology alternatives;
- Describe the need and desirability of the proposed alternatives;
- Through the undertaking of an impact and risk assessment process, inclusive of cumulative impacts which focused on determining the geographical, physical, biological, social, economic, heritage, and cultural sensitivity of the sites and locations within sites and the risk of impact of the proposed activity and technology alternatives on these aspects to determine the nature, significance, consequence, extent, duration, and probability of the impacts occurring and the degree to which these impacts can be reversed; may cause irreplaceable loss of resources; and can be avoided, managed or mitigated; and
- Through a ranking of the site sensitivities and possible impacts, identify and motivate a preferred site, activity and technology alternative; identify suitable measures to avoid, manage or mitigate identified impacts; and identify residual risks that need to be managed and monitored.

These above objectives are to be met through a consultative process that incorporates inputs from environmental specialists, government departments, and the interested and affected public.

Project Proposal

Existing land use

Existing facilities on the site include the Colin Eglin Sea Point Public Library, Sea Point Civic Centre and Hall, Fives Football Green Point Sports Club, Glen Green Point Sports Centre (including the Atlantic Green Point Bowling Club), Pinocchio Crèche, and the Western Province Bridge Centre for the Western Cape Bridge Union. The Cape Peninsula Organisation for the Aged (CPOA) is located directly north of the site, and a portion is leased by the CPOA for parking. Additional on-site infrastructure includes an electrical substation, internal roads and parking areas. The proposed concept design retains the library, civic centre and hall and provision is also made to extend the library building, reconfigure internal spaces, accommodate other community and civic uses within the new additions and re-purposed spaces. The proposal includes a new building and outdoor space for a crèche/ECD and the CPOA parking on the site will be incorporated into the design. The electric substation will be moved to a different location to maximise the developability of the site.

Proposed concept design

The proposed concept design provides a framework to guide future development, establishing principles, structure, and parameters within which future development can occur. The actual design of the site will be undertaken by the future developers of the site.

The purpose of the development concept is to establish the technical feasibility of a maximised development envelope. This conceptual envelope will ultimately inform the approval of a flexible basket of mixed-use rights which the developer can interpret in a manner that best resonates with their understanding of the market. While the City's minimum requirements for the development will be fixed in the conditions of approval, it is not the City's intention to be overly prescriptive in terms of the design, spatial orientation land-use mix or bulk take-up of the development. Future development will have to comply with prescribed mandatory requirements such as **height & massing, setbacks, facade articulation, access, urban structure and structural landscaping.**

The proposed development of the site for mixed-use aligns with the municipal and local frameworks, and responds directly to the increasing need for residential housing in and around the CBD. The inclusion of retail offerings is intended to enhance the connectivity and continuity of the site with the surrounding retail character, activating the Main Road street interface. The proposed concept design also intends to not only retain but enhance the capacity and functionality of the existing civic node on the site.

The proposed concept design has undergone an iterative design process and the various elements, as shown in Figure 2, Figure 3, Figure 4 and Figure 5 are described below:

1) **Civic node and Crèche**
   - Sea Point Civic Centre and Hall
   - Existing Sea Point Public Library with a proposed extension and additional development bulk envisaged above the existing building footprint (design subject to heritage, structural, visual impact and architectural specialist input at Precinct Plan stage, consistent with the conditions set out in the Heritage Impact Assessment).
   - Above ground parking bays and access to basement parking
   - New location for a crèche

2) **Retail Activation along Main Road**
   - Retail space on the ground-floor and first floor

3) **Residential Placement**
   - Residential (including affordable, middle- and high-income housing)
   - Potential for office space

4) **Hotel Placement**
   - Hotels are proposed at either end of the development

The proposed concept design also accommodated potential office and other business land uses via the rezoning application process which is to include General Business zoning (GB6).

Additionally, the proposed concept design includes basement parking (three levels), internal roadways and green space. The green space includes:

- Hard and soft landscaping internal to the site along access roads and internal pedestrian routes.
- Retention and preservation of eucalyptus trees on the eastern side of the site.
- Retention and preservation of the trees bordering the site along Sea Point Main Road forming part of the extended Cape Town Fan Walk.

Various analyses and impact assessments, as well as voluntary (pre-statutory) public engagements undertaken to date, have informed the iterative design process which has considered multiple layouts and massing alternatives. The proposed concept design therefore represents a well-informed proposal intended to enhance connectivity with surrounding areas, integrate the site with the surrounding urban environment, and support the City's community and economic needs.

Key changes to the Proposed Concept Design

- **Civic node additions:**

As per the first draft of the Concept Design that underwent a non-statutory public engagement process in November – December 2025, the existing library and civic centre are proposed to be retained and include a sensitively designed northward extension to the library.

In addition to the above, the revised Concept Design presented in this report proposes potential additional development bulk envisaged within the civic node (refer to Figure 2). It is important to note that this extension and/or addition above the existing library will need to be undertaken by an architect with the relevant expertise in modernist buildings and will be subject to future detailed heritage assessment, should this opportunity be pursued by a future developer. This component is included solely to reflect the site's potential development capacity and to ensure that the full extent of the possible future development footprint is considered at a strategic level. As such, this part of the proposed concept design is indicated in dotted lines in the conceptual frameworks presented in this report.

- **Tree protection zones**

A tree survey has been undertaken and has informed the proposed concept design, resulting in tree protection zones being established and associated development setbacks along Main Road (refer to **Appendix L5**).

KEY

- RETAIL EDGE
- VIEW CORRIDORS
- PRIME LOCATION
- GATEWAY BUILDINGS
- CIVIC HERITAGE BUILDINGS
- CIVIC FORECOURT
- GREEN COURTS
- RETAIL SQUARE
- NEW FULL INTERSECTION
- LEFT IN AND/ OR LEFT OUT
- BASEMENT ACCESS
- DELIVERY AREA
- NEW DEVELOPMENT PODIUM
- NEW DEVELOPMENT TOWERS
- PEDESTRIAN NETWORK
- EXISTING TREES RETAINED
- NEW TREES
- SOFT LANDSCAPING
- BIOSWALES

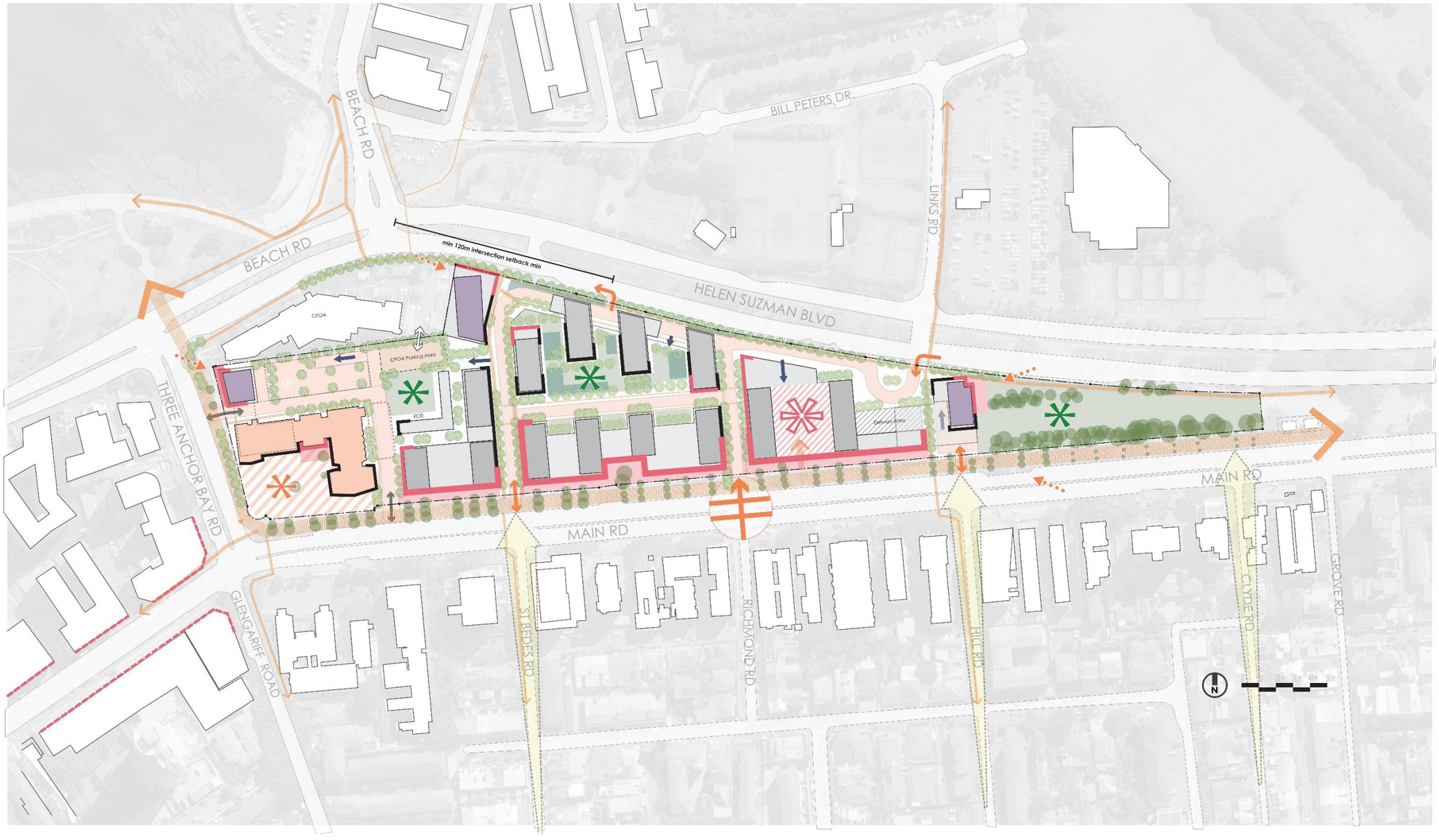


Figure 2: Proposed Overall Conceptual Framework Plan (ACG Architects)

Figure 3: Proposed landscape plan (ACG architects)

The proposed massing is indicated in Figure 4 and Figure 5 below. This shows the varied height profile of the proposed development creating hierarchy and a coherent urban skyline. Overall, the massing strategy establishes a clear height gradient. Lower-scale podiums of two to four storeys define the street interface and activate the public realm, while the slenderer tower elements rise from this base. This approach ensures an active and human-scaled streetscape while accommodating increased density above. The details regarding the heights and massing are included in Section B and H of this report.

Figure 4: Proposed massing along Main Road (ACG architects)

Figure 5: Proposed massing along Helen Suzman Boulevard (ACG architects)

Land use and zoning

The current land uses align with the existing zoning of the site as Public Open Space (OS2), although the site will be rezoned to maximise the mixed-use development potential of the site and accommodate the proposed concept design. This includes the Civic Node being rezoned to Community Zone (CO2), the developable portion zoned to an appropriate General Business Zone (GB6) and the eucalyptus trees on the eastern side of the site proposed to be zoned Open Space OS3 (see Figure 6 below).

Figure 6: Proposed land zoning for erf 2187

Need and Desirability

Addressing the need and desirability of a development is required in legislation as a way of ensuring sustainable development. The need for and desirability of the proposed development of Erf 2187 in Three Anchor Bay are considered in this Basic Assessment Report in terms of its alignment with spatial planning and policy, its social context and social impacts and its response to the principles of environmental management including the mitigation of environmental impacts of the associated activities.

Development must be ecologically sustainable and socially and economically justifiable. The draft development concept proposes a vibrant mixed-use development that integrates residential, retail, hotel, and green public spaces, while retaining the civic cluster including the civic hall and library and including provision of an Early Childhood Care (ECD)/crèche facility. The design aims to enhance connectivity, integrate with the surrounding urban environment, and create a dynamic public realm that supports both community and economic activity. The proposed concept design provides a framework for future development of the site, aiming to improve the use of currently underutilised and already transformed land near the City's CBD. This means that the proposed development aims to both build infrastructure that will optimise mixed-use of the site as well as preserve and improve the integrity of the heritage sensitivities on site, by retaining and upgrading the library and civic centre buildings as a public place. The balance between the desired outcomes was the subject of an iterative, consultative, and constraints-led design process for the site.

The District Plan Environmental Management Frameworks (EMF's) were approved by Council under the Municipal Planning By-Law in February 2023, and the EMF's and urban areas for the City of Cape Town Metropolitan Municipality were adopted by the Department of Environmental Affairs and Development Planning in 2025 (Provincial Notice: 87/2025). According to the 2023 Table Bay District Plan, the site is identified and earmarked as a Community Civic Cluster as well as New Development Area suitable for potential high density residential development (page 109 of the TBDSDF).

Impact Assessment

It is anticipated that the proposed development will result in general construction-related negative impacts on the surrounding community during the construction phase. These impacts, which include noise, vibration, dust, traffic and visual nuisance, are typical of construction and can be mitigated and managed as set out in the construction section of the environmental management programme.

Positive socio-economic impacts are anticipated as a result of the proposed mixed-use development, including provision of affordable housing located in close proximity to the Cape Town CBD and other economic nodes. This potential impact has been identified and evaluated as an anticipated positive impact for the planning and design phase of the development. Activation of a currently underutilised site through a mixed-use development that includes commercial, residential and retail uses as well as the retention and upgrade of the community civic spaces is anticipated to positively affect the immediate area. Construction activities will generate temporary employment opportunities, while commercial and retail components are expected to create permanent jobs post construction.

The proposed development creates continuity with the existing retail edge along Green Point Main Road and Sea Point Main Road which is dominated by a diversity of cafés and restaurant outlets and some small-scale malls, with a few franchised food outlets. The proposed development is in keeping with spatial planning imperatives to maximise the use of underutilised and transformed land within the urban edge, particularly where it is in public ownership, and with a need to improve access to affordable housing stock close to employment.

Due to the nature of the proposed concept design, the impacts are described in this report are separated into Construction and Post-Construction Phase. The Post-Construction Phase includes the impacts associated with the physical form of the development once construction has been completed (e.g. heritage and visual), as well as operational impacts anticipated with the operation of different elements of the concept design (e.g. traffic and commercial use). Impacts associated with the proposed concept design have been assessed as follows:

Table 1: Significance of impacts

	Alternative 1 (preferred)		Alternative 2: No-go
	Without mitigation	With mitigation	Without mitigation With mitigation
CONSTRUCTION PHASE			
Construction-phase transport impacts	Medium negative	Low negative	None
Construction-phase noise and vibration impacts	Medium-high negative	Low negative	None
Construction-phase dust impacts	Medium-high negative	Low negative	None
Socio-economic impacts			
Construction-phase impact on production and GDP	Medium-high positive	High positive	None
Construction-phase employment creation	Medium positive	Medium-high positive	None
Construction-phase household income impacts	Medium positive	Medium-high positive	None
Construction-phase impact on government revenue	Medium positive	Medium-high positive	None
Construction-phase skills development impacts	Low positive	Medium positive	None
Construction-phase traffic congestion impacts (from a socio-economic perspective)	Medium-high negative	Medium negative	None
Construction-phase impact on sense of place (visual)	Medium negative	Low negative	None

	Alternative 1 (preferred)		Alternative 2: No-go
	Without mitigation	With mitigation	Without mitigation With mitigation
Construction-phase impact on access to civic facilities and services	High negative	Medium negative	None
Construction-phase impact on ECD centre	High negative	Medium-high negative	None
POST-CONSTRUCTION PHASE			
Socio-economic impacts			
Sustained impact on production and GDP	Medium positive	Medium-high positive	None
Sustained impact on employment creation	Medium-high positive	High positive	None
Sustained impact on household income impacts	Medium-high positive	High positive	None
Sustained impact on government revenue	Medium positive	Medium positive	None
Sustained impact on skills development impacts	Low positive	Medium positive	None
Sustained impact on traffic flow impacts (from a socio-economic perspective)	High negative	Medium-high negative	None
Sustained impact on sense of place (visual)	Medium negative	Low negative	None
Sustained impact on land value	Low positive	Low positive	None
Sustained impact on access to civic facilities and services	Medium positive	High positive	None
Sustained impact on ECD centre	Medium positive	High positive	None
Sustained impact on recreational activity impacts	Medium negative	Medium negative	None
Sustained impact on housing availability and affordable housing provision	Medium-high positive	High positive	None
Transport impacts			
Anticipated transport impacts	Medium negative	Low negative	None
Visual impacts			
Impact on visual corridors	Medium – high change	Low – medium change (acceptable)	None
Visual impact on Green Point Common interface	High change	Medium – low change (acceptable)	None
Visual impact on the streetscape	Medium change	Low change (positive)	None
Visual impact on infrastructure viewpoints	Medium change	Medium change (positive)	None
Visual impact on distant viewpoints (promenade, High Level Road and Signal Hill)	Medium change	Medium – low change (acceptable)	None
Civic node visual impacts (conceptual – detailed assessment required at SDP stage)	Medium – high change	Low – medium change (acceptable)	None
Heritage impacts			
Potential impact on the Colin Eglin Library and Sea Point Civic Centre Complex (subject to further assessment)	High negative	Medium positive	None
Loss of a long-standing open space (former bowling greens)	Medium negative	Low negative	None
Impact on heritage significance of urban landscape	Medium negative	Low negative	None

Note that the significance ratings for the visual impacts derive from the magnitude of change and receptor sensitivity, reflecting the degree of visual change. The nature of the impact is included which shows whether the impact is acceptable, negative or positive. This is based on the assessment criteria described in the VIA (Appendix G2).

Please note that any potential risks to the adjacent coast and ocean can be adequately mitigated via the appropriate construction mitigation measures, as stormwater management is required to improve runoff quality and control quantity via a treatment-train approach. A Stormwater Management Plan has been prepared by EAS Engineers for the proposed concept design (**Appendix L3**), which describes the recommended stormwater management measures on site.

EAP's Recommendation

Based on the findings of this Basic Assessment, it is the opinion of the appointed environmental assessment practitioners that there are no negative environmental impacts that cannot be satisfactorily mitigated to acceptable levels. The proposed mixed-use development aligns with various planning and policy documents and addresses a societal need through the provision of commercial, retail and residential opportunities. The environmental impacts are considered, and mitigation measures as recommended by the specialists will be implemented during the construction phase of the development to ensure that negative impacts are minimised and monitored.

The project involved a consultative design process, which prioritised local participation and stakeholder engagement within decision-making processes of the design layout, and utilised feedback received as an informant on how to utilise the site in a manner that meets the City's objectives as well as surrounding community needs.

The proposed concept design is consistent with municipal and provincial planning and will not result in environmental opportunity costs or unacceptable degradation of sensitive natural systems. The proposed activities should therefore receive environmental authorisation (for the proposed site), subject to the conditions set out in the Basic Assessment Report and Environmental Management Programme (EMPr).

The EMPr has been compiled to ensure effective implementation of the mitigation and management actions, included as **Appendix H** of this Draft Basic Assessment Report. The mitigation measures necessary to ensure that the project is planned, constructed, and operated in an environmentally responsible manner are listed in this EMPr. The EMPr should be used as a guide for the development of the site, although the developable portion of the site will be subject to detailed designs submitted by the developers once the site has been disposed of which may require adjustments and additions to the EMPr. Therefore, the EMPr should be updated regularly in response to any detailed development plans such that it provides clear and implementable measures for the establishment and operation of the proposed mixed-use development.

There are no significant uncertainties or gaps in knowledge relating to the assessment and mitigation measures, other than those specifically listed in the relevant specialist studies – these relate primarily to the detailed level of design which will follow from the approvals, and for which design indicators and outcomes have been prescribed.

The proposed concept design intended as a framework to guide the future development of the site responds directly to the City's objectives for underutilised land within urban areas and aligns with the relevant policy frameworks that identify the site as a community civic cluster, institutional structuring open space and high-density residential development.

Taking into consideration the findings of the various specialist studies and the issues raised by interested and affected parties and organs of state, it is the EAP's reasoned opinion that the proposed activity **should receive Environmental Authorisation** in terms of the EIA Regulations, 2014 (as amended) subject to the following conditions:

- Implementation of the Environmental Management Programme (EMPr) forming part of this Basic Assessment Report during the design and construction phases of the development.
- Appointment of an independent Environmental Control Officer (ECO) for the duration of the construction phase to carry out the responsibilities of that role as defined in the EMPr.
- The development of Urban Design Guidelines and Development Requirements Report, informed by the Urban Design Report (Appendix L1) which will be prepared to support the land use management process and town planning application. The report will establish urban design principles and guidelines, development requirements and parameters, additional design and land release guidelines, and illustrative test diagrams.
- The City of Cape Town must implement institutional and management arrangements that incorporate ongoing consultation with adjacent communities in the implementation of sports and economic opportunities on the site.
- The recommendations of the Heritage Impact Assessment, to the extent endorsed by Heritage Western Cape, must be implemented.

Public Participation

Pre-statutory public participation (April – December 2025)

An inclusive stakeholder engagement process has formed part of the concept development, intended to provide for meaningful participation by local and affected participants and contribute to a more robust and accepted concept design for the site.

1.1.1 Information Sharing Phase

The pre-statutory public participation process started in April 2025 with a pre-registration process and Information Sharing Phase including public engagement events (open house and online meeting) to share information about the project site. Potential interested and affected parties were notified and a database of registered Interested and Affected Parties was started and updated throughout the engagement process. A media notice containing details about the opportunities for stakeholder engagement and request for public inputs was published in the local free newspaper, the *Atlantic Sun,* on 17 April 2025. Additionally, the City of Cape Town issued a media release about the stakeholder engagement process – providing an overview of the project proposal, how to participate, and the details of an Online Public Meeting on 7 May 2025 and an in-person Open House on 14 May 2025. Inputs from the public and stakeholders were received until 31 May 2025 and were taken into consideration in the next phase – the development of a draft concept design.

1.1.2 Draft Concept Design Phase

The draft Concept Design Phase included a 30-day registration and commenting period that started on Thursday 06 November 2025 and closed on Monday 08 December 2025. A public open house was hosted on the 12th of November 2025 which presented the draft development concept for a mixed-use development on erf 2187, Three Anchor Bay, Green Point. Comments received during this phase have been considered and incorporated into the final proposed Concept Design, where appropriate (refer to the **Pre-statutory Public Participation Report** – **Appendix F**). In total 250 people registered as I&APs during the Concept Design Phase, the majority of which registered via the website.

The database of registered interested and affected parties has been updated as the project progressed, and the total number of registrations since the start of the stakeholder engagement process is approximately 980 people. Over the duration of the non-statutory public engagement process, approximately 185 comments were received by interested and affected parties. Of the comments, 14 written comments were submitted at the Open House and 171 were submitted via the

website and email. Furthermore, a project website has been maintained through the project process, hosted at www.infinity.capetown/3anchorbay, providing information on the draft concept and project proposals, information on the conceptual design process, including all meeting notes and presentations, and a comment and registration form for submission of inputs.

Current public participation process on draft Basic Assessment Report (June 2026)

We are now in the **Statutory Engagement Phase** and invite members of the public who feel they are affected by or have an interest in the proposed project, to comment on the draft Basic Assessment Report and to register as Interested and Affected Parties (I&APs). All registered I&APs will receive communication regarding the proposed project and will be notified of any future opportunities for comment. Interested and affected parties are required to provide contact information and a declaration of any interest they may have in the application to register.

Potential interested and affected parties have been identified, including immediately adjacent landowners and occupiers, ward councillors, municipal officials, relevant state departments and all existing registered I&APs. Notification letters have been emailed or hand delivered to all identified interested and affected parties informing them of the proposal and the opportunity to comment on the draft Basic Assessment Report.

A database of potential interested and affected parties have been compiled that includes immediately adjacent landowners and occupiers, ward councillors, municipal officials, relevant state departments and organs of state. Notification letters have been posted or emailed to all identified interested and affected parties informing them of the proposal and the opportunity to comment on the draft Basic Assessment Report.

A 30-day public participation process will start on Thursday 18 June 2026 and end on Monday 20 July 2026.

Interested and affected parties are invited to review the draft Basic Assessment Report, and **comment** using any of the following methods:

Online at **www.infinityenv.co.za/3anchorbay**

By email to **3anchorbay@infinity.capetown**

By WhatsApp message to **060 524 7676**

The 30-day commenting period will start on Thursday 18 June 2026 and end on Monday 20 July 2026.

For more information, to comment, or to arrange alternative ways of participating, please contact the Environmental Assessment Practitioner, Tarryn Solomon of Infinity Environmental, at the details above.

Processing of personal information

We are required by the EIA Regulations (2014, as amended) of the National Environmental Management Act to maintain a register of interested and affected parties including of people who have commented, attended meetings, or requested registration. This requires us to collect and process certain personal information as defined in the Protection of Personal Information Act, 2013. The following personal information has been collected for the purpose of public participation from identified I&APs and will be collected from anyone who comments or registers:

- Name, contact details and address;
- A copy of any comments submitted; and
- Details of any interest declared in the granting or refusal of the application.

Personal information will be held by Infinity Environmental and the City of Cape town and will be used only for the purpose of public participation for this project. Should you register and/or comment, your name and your comments will be included in published documents. Your contact details, address and interest declaration will be provided to the competent authority and must also be provided to any appellants in the event that the EA is appealed in terms of the Appeal Regulations, GNR 5985 of 2025. Personal information will be stored by Infinity Environmental (Pty) Ltd at 2 Fir Street, Observatory 7925, and on a password-secured cloud storage system which may include servers outside the Republic of South Africa. You may at any time request access to or rectify this information by contacting us at info@infinityenv.co.za.

Visit www.infinityenv.co.za/legal to view our Privacy Policy.

REPORT OVERVIEW

	Executive Summary
Section A	Administrative Details
Section B	Confirmation of specific project details
Section C	Legislation, policies and guidelines or protocols
Section D	Applicable listed activities
Section E	Planning context and need and desirability
Section F	Public participation
Section G	Description of the receiving environment
Section H	Alternatives, methodology and assessment of alternatives
Section I	Findings, impact management and mitigation measures
Section J	General
Declarations	
Appendices	

ABBREVIATIONS

ha	Hectare
m^2	Square metre
BAR	Basic Assessment Report
CBA	Critical Biodiversity Area
DEA&DP	Western Cape Department of Environmental Affairs and Development Planning
DWS	National Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EIA Regulations	Environmental Impact Assessment Regulations, 2014, as amended by GN R 326 of 7 April 2017
EIS	Ecological Importance and Sensitivity
EMF	Environmental Management Framework
EMPr	Environmental Management Programme
ESA	Ecological Support Area
HWC	Heritage Western Cape
I&AP	Interested and Affected Party
IDP	Integrated Development Plan

NEMBA	National Environmental Management: Biodiversity Act (Act 10 of 2004)
NHRA	National Heritage Resources Act (Act 25 of 1999)
NWA	National Water Act (Act No. 36 of 1998)
PPP	Public Participation Process
SDF	Spatial Development Framework
ToR	Terms of Reference

Summary of how the requirements of Appendix 1 of the 2014 NEMA EIA Regulations (GN R 326, as amended) are met by this Basic Assessment Report

Appendix 1 requirement	Section of BAR
1) A basic assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include-	
(a) details of – i. the EAP who prepared the report; and ii. the expertise of the EAP, including a curriculum vitae;	**A** ***EAP is EAPASA-registered***
(b) the location of the activity, including (i) the 21 digit Surveyor General code of each cadastral land parcel; (ii) where available, the physical address and farm name; (iii) where the required information in items (i) and (ii) is not available, the coordinates of the boundary of the property or properties;	**B - 4.6** **B - 4.4** **B - 4.7**
(c) a plan which locates the proposed activity or activities applied for as well as associated structures and infrastructure at an appropriate scale; or, if it is- (i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; or (ii) on land where the property has not been defined, the coordinates within which the activity (iii) is to be undertaken;	**Appendix B1**
(d) a description of the scope of the proposed activity, including (i) all listed and specified activities triggered and being applied for; and (ii) a description of the activities to be undertaken including associated structures and infrastructure;	**D** **B - 4.4**
(e) a description of the policy and legislative context within which the development is proposed including- (i) an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to this activity and have been considered in the preparation of the report; and (ii) how the proposed activity complies with and responds to the legislation and policy context, plans, guidelines, tools frameworks, and instruments	**E**
(f) a motivation for the need and desirability for the proposed development including the need and desirability of the activity in the context of the preferred location	**E, H** **Appendix K**
(g) a motivation for the preferred site, activity and technology alternative;	**H**
(h) a full description of the process followed to reach the proposed preferred alternative within the site, including – (i) details of all the alternatives considered; (ii) details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs; (iii) a summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, or the reasons for not including them; (iv) the environmental attributes associated with the alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; (v) the impacts and risks identified for each alternative, including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts- (aa) can be reversed; (bb) may cause irreplaceable loss of resources; and (cc) can be avoided, managed or mitigated; (vi) the methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks associated with the alternatives;	**H and I**

(vii) positive and negative impacts that the proposed activity and alternatives will have on the environment and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects; (viii) the possible mitigation measures that could be applied and level of residual risk; (ix) the outcome of the site selection matrix; (x) if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such; and (xi) a concluding statement indicating the preferred alternatives, including preferred location of the activity;	
(i) a full description of the process undertaken to identify, assess and rank the impacts the activity will impose on the preferred location through the life of the activity, including– (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process; and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures;	**I**
(j) an assessment of each identified potentially significant impact and risk, including– (i) cumulative impacts; (ii) the nature, significance and consequences of the impact and risk; (iii) the extent and duration of the impact and risk; (iv) the probability of the impact and risk occurring; (v) the degree to which the impact and risk can be reversed; (vi) the degree to which the impact and risk may cause irreplaceable loss of resources; and (vii) the degree to which the impact and risk can be avoided, managed or mitigated;	**I**
(k) where applicable, a summary of the findings and impact management measures identified in any specialist report complying with Appendix 6 to these Regulations and an indication as to how these findings and recommendations have been included in the final report;	**I**
(l) an environmental impact statement which contains– (i) a summary of the key findings of the environmental impact assessment; (ii) a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers; and (iii) a summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;	**J** **Appendix B2** **J**
(m) based on the assessment, and where applicable, impact management measures from specialist reports, the recording of the proposed impact management outcomes for the development for inclusion in the EMPr;	**J - 2.1**
(n) any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation;	**J - 2.2**
(o) a description of any assumptions, uncertainties, and gaps in knowledge which relate to the assessment and mitigation measures proposed;	**J - 2.4**
(p) a reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation;	**J - 2.3**
(q) where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required, the date on which the activity will be concluded, and the post construction monitoring requirements finalised;	**J – 2.5**
(r) an undertaking under oath or affirmation by the EAP in relation to– (i) the correctness of the information provided in the reports; (ii) the inclusion of comments and inputs from stakeholders and I&APs; (iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and (iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties; and	**K**
(s) where applicable, details of any financial provisions for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts;	**n/a**
(t) any specific information that may be required by the competent authority; and	**n/a**
(u) any other matters required in terms of section 24(4)(a) and (b) of the Act.	**n/a**

Western Cape Government

Department of Environmental Affairs and Development Planning

BASIC ASSESSMENT REPORT

THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

APRIL 2024

BASIC ASSESSMENT REPORT

THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) AND THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS.

APRIL 2024

(For official use only)	
Pre-application Reference Number (if applicable):	
EIA Application Reference Number:	
NEAS Reference Number:	
Exemption Reference Number (if applicable):	
Date BAR received by Department:	
Date BAR received by Directorate:	
Date BAR received by Case Officer:	

GENERAL PROJECT DESCRIPTION

(This must Include an overview of the project including the Farm name/Portion/Erf number)

PROPOSED MIXED-USE DEVELOPMENT ON ERF 2187, THREE ANCHOR BAY, GREEN POINT

IMPORTANT INFORMATION TO BE READ PRIOR TO COMPLETING THIS BASIC ASSESSMENT REPORT

1. **The purpose** of this template is to provide a format for the Basic Assessment report as set out in Appendix 1 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), Environmental Impact Assessment ("EIA") Regulations, 2014 (as amended) in order to ultimately obtain Environmental Authorisation.

2. The Environmental Impact Assessment ("EIA") Regulations is defined in terms of Chapter 5 of the National Environmental Management Act, 19998 (Act No. 107 of 1998) ("NEMA") hereinafter referred to as the "NEMA EIA Regulations".

3. *Submission of documentation, reports and other correspondence:*

   The Department has adopted a digital format for corresponding with proponents/applicants or the general public. If there is a conflict between this approach and any provision in the legislation, then the provisions in the legislation prevail. If there is any uncertainty about the requirements or arrangements, the relevant Competent Authority must be consulted.

   The Directorate: Development Management has created generic e-mail addresses for the respective Regions, to centralise their administration. Please make use of the relevant general administration e-mail address below when submitting documents:

   DEADPEIAAdmin@westerncape.gov.za
   Directorate: Development Management (Region 1):
   City of Cape Town; West Coast District Municipal area;
   Cape Winelands District Municipal area and Overberg District Municipal area.

   DEADPEIAAdmin.George@westerncape.gov.za
   Directorate: Development Management (Region 3):
   Garden Route District Municipal area and Central Karoo District Municipal area

   General queries must be submitted via the general administration e-mail for EIA related queries. Where a case-officer of DEA&DP has been assigned, correspondence may be directed to such official and copied to the relevant general administration e-mail for record purposes.

   All correspondence, comments, requests and decisions in terms of applications, will be issued to either the applicant/requester in a digital format via email, with digital signatures, and copied to the Environmental Assessment Practitioner ("EAP") (where applicable).

4. The required information must be typed within the spaces provided in this Basic Assessment Report ("BAR"). The sizes of the spaces provided are not necessarily indicative of the amount of information to be provided.

5. All applicable sections of this BAR must be completed.

6. Unless protected by law, all information contained in, and attached to this BAR, will become public information on receipt by the Competent Authority. If information is not submitted with this BAR due to such information being protected by law, the applicant and/or Environmental Assessment Practitioner ("EAP") must declare such non-disclosure and provide the reasons for believing that the information is protected.

7. This BAR is current as of **April 2024**. It is the responsibility of the Applicant/ EAP to ascertain whether subsequent versions of the BAR have been released by the Department. Visit this Department's website at http://www.westerncape.gov.za to check for the latest version of this BAR.

8. This BAR is the standard format, which must be used in all instances when preparing a BAR for Basic Assessment applications for an environmental authorisation in terms of the NEMA EIA Regulations when the Western Cape Government Department of Environmental Affairs and Development Planning ("DEA&DP") is the Competent Authority.

9. Unless otherwise indicated by the Department, one hard copy and one electronic copy of this BAR must be submitted to the Department at the postal address given below or by delivery thereof to the Registry Office of the Department. Reasonable access to copies of this Report must be provided to the relevant Organs of State for consultation purposes, which may, if so indicated by the Department, include providing a printed copy to a specific Organ of State.

10. This BAR must be duly dated and originally signed by the Applicant, EAP (if applicable) and Specialist(s) and must be submitted to the Department at the details provided below.

11. The Department's latest Circulars pertaining to the "One Environmental Management System" and the EIA Regulations, any subsequent Circulars, and guidelines must be taken into account when completing this BAR.

12. Should a water use licence application be required in terms of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"), the "One Environmental System" is applicable, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the NWA. Refer to this Department's Circular EADP 0028/2014: One Environmental Management System.

13. Where Section 38 of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA") is triggered, a copy of Heritage Western Cape's final comment must be attached to the BAR.

14. The Screening Tool developed by the National Department of Environmental Affairs must be used to generate a screening report. Please use the Screening Tool link https://screening.environment.gov.za/screeningtool to generate the Screening Tool Report. The screening tool report must be attached to this BAR.

15. Where this Department is also identified as the Licencing Authority to decide on applications under the National Environmental Management: Air Quality Act (Act No. 29 of 2004) ('NEM:AQA"), the submission of the Report must also be made as follows, for-
Waste Management Licence Applications, this report must also (i.e., another hard copy and electronic copy) be submitted for the attention of the Department's Waste Management Directorate (Tel: 021-483-2728/2705 and Fax: 021-483-4425) at the same postal address as the Cape Town Office.

    Atmospheric Emissions Licence Applications, this report must also be (i.e., another hard copy and electronic copy) submitted for the attention of the Licensing Authority or this Department's Air Quality Management Directorate (Tel: 021 483 2888 and Fax: 021 483 4368) at the same postal address as the Cape Town Office.

DEPARTMENTAL DETAILS	
CAPE TOWN OFFICE: **DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 1)** (City of Cape Town, West Coast District, Cape Winelands District & Overberg District)	**GEORGE REGIONAL OFFICE:** **DIRECTORATE: DEVELOPMENT MANAGEMENT (REGION 3)** (Central Karoo District & Garden Route District)
The completed Form must be sent via electronic mail to: DEADPEIAAdmin@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 1) at: E-mail: DEADPEIAAdmin@westerncape.gov.za Tel: (021) 483-5829 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 1) Private Bag X 9086 Cape Town, 8000	The completed Form must be sent via electronic mail to: DEADPEIAAdmin.George@westerncape.gov.za Queries should be directed to the Directorate: Development Management (Region 3) at: E-mail: DEADPEIAAdmin.George@westerncape.gov.za Tel: (044) 814-2006 Western Cape Government Department of Environmental Affairs and Development Planning Attention: Directorate: Development Management (Region 3) Private Bag X 6509 George, 6530

MAPS

Provide a location map (see below) as Appendix A1 to this BAR that shows the location of the proposed development and associated structures and infrastructure on the property.	
Locality Map:	The scale of the locality map must be at least 1:50 000. For linear activities or development proposals of more than 25 kilometres, a smaller scale e.g., 1:250 000 can be used. The scale must be indicated on the map. The map must indicate the following: • an accurate indication of the project site position as well as the positions of the alternative sites, if any; • road names or numbers of all the major roads as well as the roads that provide access to the site(s) • a north arrow; • a legend; and • a linear scale. For ocean based or aquatic activity, the coordinates must be provided within which the activity is to be undertaken and a map at an appropriate scale clearly indicating the area within which the activity is to be undertaken. Where comment from the Western Cape Government: Transport and Public Works is required, a map illustrating the properties (owned by the Western Cape Government: Transport and Public Works) that will be affected by the proposed development must be included in the Report.
Provide a detailed site development plan / site map (see below) as Appendix B1 to this BAR; and if applicable, all alternative properties and locations.	
Site Plan:	Detailed site development plan(s) must be prepared for each alternative site or alternative activity. The site plans must contain or conform to the following: • The detailed site plan must preferably be at a scale of 1:500 or at an appropriate scale. The scale must be clearly indicated on the plan, preferably together with a linear scale. • The property boundaries and numbers of all the properties within 50m of the site must be indicated on the site plan. • On land where the property has not been defined, the co-ordinates of the area in which the proposed activity or development is proposed must be provided. • The current land use (not zoning) as well as the land use zoning of each of the adjoining properties must be clearly indicated on the site plan. • The position of each component of the proposed activity or development as well as any other structures on the site must be indicated on the site plan. • Services, including electricity supply cables (indicate aboveground or underground), water supply pipelines, boreholes, sewage pipelines, storm water infrastructure and access roads that will form part of the proposed development **must** be clearly indicated on the site plan. • Servitudes and an indication of the purpose of each servitude must be indicated on the site plan. • Sensitive environmental elements within 100m of the site must be included on the site plan, including (but not limited to): o Watercourses / Rivers / Wetlands

	○ Flood lines (*i.e.*, 1:100 year, 1:50 year and 1:10 year where applicable); ○ Coastal Risk Zones as delineated for the Western Cape by the Department of Environmental Affairs and Development Planning ("DEA&DP"): ○ Ridges; ○ Cultural and historical features/landscapes; ○ Areas with indigenous vegetation (even if degraded or infested with alien species). • Whenever the slope of the site exceeds 1:10, a contour map of the site must be submitted. • North arrow A map/site plan must also be provided at an appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred and alternative sites indicating any areas that should be avoided, including buffer areas.
Site photographs	Colour photographs of the site that shows the overall condition of the site and its surroundings (taken on the site and taken from outside the site) with a description of each photograph. The vantage points from which the photographs were taken must be indicated on the site plan, or locality plan as applicable. If available, please also provide a recent aerial photograph. Photographs must be attached to this BAR as **Appendix C**. The aerial photograph(s) should be supplemented with additional photographs of relevant features on the site. Date of photographs must be included. Please note that the above requirements must be duplicated for all alternative sites.
Biodiversity Overlay Map:	A map of the relevant biodiversity information and conditions must be provided as an overlay map on the property/site plan. The Map must be attached to this BAR as **Appendix D**.
Linear activities or development and multiple properties	GPS co-ordinates must be provided in degrees, minutes and seconds using the Hartebeeshoek 94 WGS84 co-ordinate system. Where numerous properties/sites are involved (linear activities) you must attach a list of the Farm Name(s)/Portion(s)/Erf number(s) to this BAR as an Appendix. For linear activities that are longer than 500m, please provide a map with the co-ordinates taken every 100m along the route to this BAR as **Appendix A3**.

ACRONYMS

DFFE:	Department of Forestry, Fisheries, and Environment
DEA:	Department of Environmental Affairs
DEA& DP:	Department of Environmental Affairs and Development Planning
DHS:	Department of Human Settlement
DoA:	Department of Agriculture
DoH:	Department of Health
DWS:	Department of Water and Sanitation
EMPr:	Environmental Management Programme
HWC:	Heritage Western Cape
NFEPA:	National Freshwater Ecosystem Protection Assessment
NSBA:	National Spatial Biodiversity Assessment
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government

ATTACHMENTS

Note: The Appendices must be attached to the BAR as per the list below. Please use a ✓ **(**tick) or a **x** (cross) to indicate whether the Appendix is attached to the BAR.

The following checklist of attachments must be completed.

APPENDIX			**✓ (Tick) or x (cross)**
Appendix A:	**Maps**		
	Appendix A1:	**Locality Map**	✓
	Appendix A2:	**Coastal Risk Zones as delineated in terms of ICMA for the Western Cape by the Department of Environmental Affairs and Development Planning**	**x**
	Appendix A3:	**Map with the GPS co-ordinates for linear activities**	**N/A**
	Appendix A4:	**EAP's CV**	✓
Appendix B:	**Appendix B1:**	**Site development plan(s)** Refer to Appendix L1 and L5 for detailed Concept Design and Landscape Plans	✓
	Appendix B2	**A map of appropriate scale, which superimposes the proposed development and its associated structures and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffer areas;**	✓
Appendix C:	**Site Photographs**		✓
Appendix D:	**Biodiversity overlay map**		✓
Appendix E:	**Permit(s) / license(s) / exemption notice, agreements, comments from State Department/Organs of state and service letters from the municipality.**		
	Appendix E1:	**Final comment/ROD from HWC**	Will be appended for final BAR
	Appendix E2:	**Copy of comment from Cape Nature**	Will be appended for final BAR
	Appendix E3:	**Final Comment from the DWS**	Will be appended for final BAR
	Appendix E4:	**Comment from the DEA: Oceans and Coast**	Will be appended for final BAR
	Appendix E5:	**Comment from the DAFF**	N/A
	Appendix E6:	**Comment from WCG: Transport and Public Works**	Will be appended for final BAR
	Appendix E7:	**Comment from WCG: DoA**	N/A

	Appendix E8:	**Comment from WCG: DHS**	N/A
	Appendix E9:	**Comment from WCG: DoH**	N/A
	Appendix E10:	**Comment from DEA&DP: Pollution Management**	Will be appended for final BAR
	Appendix E11:	**Comment from DEA&DP: Waste Management**	Will be appended for final BAR
	Appendix E12:	**Comment from DEA&DP: Biodiversity**	Will be appended for final BAR
	Appendix E13:	**Comment from DEA&DP: Air Quality**	Will be appended for final BAR
	Appendix E14:	**Comment from DEA&DP: Coastal Management**	Will be appended for final BAR
	Appendix E15:	**Comment from the local authority**	Will be appended for final BAR
	Appendix E16:	**Confirmation of all services (water, electricity, sewage, solid waste management)**	Will be appended for final BAR
	Appendix E17:	**Comment from the District Municipality**	Will be appended for final BAR
	Appendix E18:	**Copy of an exemption notice**	N/A
	Appendix E19	**Pre-approval for the reclamation of land**	N/A
	Appendix E20:	**Proof of agreement/TOR of the specialist studies conducted.**	As stated in the specialist reports
	Appendix E21:	**Proof of land use rights**	✓
	Appendix E22:	**Proof of public participation agreement for linear activities**	N/A
Appendix F:	**Public participation information: including a copy of the register of I&APs, the comments and responses Report, proof of notices, advertisements and any other public participation information as is required.**		
	Pre-statutory Public Participation Report		✓
Appendix G:	**Specialist Report(s)**		

	Appendix G1:	**Heritage Impact Assessment**	✓
	Appendix G2:	**Visual Impact Assessment**	✓
	Appendix G3:	**Socio-Economic Impact Assessment**	✓
	Appendix G4:	**Transport Impact Assessment**	✓
Appendix H:	**EMPr**		✓
Appendix I:	**Screening tool report**		✓
Appendix J:	**The impact and risk assessment for each alternative**		Refer to the section titled *Assessment of Each Impact and Risk Identified for Each Alternative*
Appendix K:	**Need and desirability for the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013)/DEA Integrated Environmental Management Guideline**		✓
Appendix L:	**Other Assessment(s)**		
	Appendix L1:	**Urban Design Concept**	✓
	Appendix L2:	**Civil Services Report**	✓
	Appendix L3:	**Stormwater Management Plan**	✓
	Appendix L4:	**Electrical Services Report**	✓
	Appendix L5:	**Landscape Architecture Report**	✓
Appendix M:	**Site Sensitivity Verification Report**		✓
Appendix N:	**Notice of Intent to Develop & HWC's Response**		✓
Appendix…..	**Any other attachments must be included as subsequent appendices**		

SECTION A: ADMINISTRATIVE DETAILS

Highlight the Departmental Region in which the intended application will fall	**CAPE TOWN OFFICE: REGION 1**		GEORGE OFFICE: BEGION 3
	(City of Cape Town, West Coast District	(Cape Winelands District & Overberg District)	(Central Karoo District & Garden Route District)
Duplicate this section where there is more than one Proponent Name of Applicant/Proponent:	City of Cape Town		
Name of contact person for Applicant/Proponent (if other):	Lance Boyd		
Company/ Trading name/State Department/Organ of State:	City of Cape Town Property Development Branch		
Company Registration Number:	N/A		
Postal address:	Old Granary Building, Harrington Street		
	Cape Town		Postal code: 8001
Telephone:	(021) 400 1882		Cell: +27(0)
E-mail:	lance.boyd@capetown.gov.za		Fax: ( )
Company of EAP:	Infinity Environmental		
EAP name:	Tarryn Solomon (Reg. E.A.P. #2019/1671) Kelly Gilmour (Cand. E.A.P. #2024/8037, Cand.Sci.Nat. #169880) Jenay Titus (Cand. E.A.P. #2026/20884)		
Postal address:	Collingwood Building, Black River Park		
	2 Fir Street, Observatory		Postal code: 7925
Telephone:	(021) 834 1600		Cell:
E-mail:	tarryn@infinityenv.co.za kelly@infinityenv.co.za jenay@infinityenv.co.za		Fax: ( )
Qualifications:	T Solomon (EAP): BSc Environmental and Water Science K Gilmour (Candidate EAP): MSc Biological Sciences Jenay Titus (Candidate EAP): BA Hons Geography & Environmental Studies		
EAP registration no:	T Solomon Reg. E.A.P. #2019/1671 K Gilmour Cand. E.A.P. #2024/8037 J Titus Reg Cand. E.A.P. #2026/20884		
Duplicate this section where there is more than one landowner Name of landowner:	City of Cape Town		
Name of contact person for landowner (if other):	Rachel Schnackenberg		
Postal address:	Civic Centre, Hertzog Boulevard		
	Cape Town		Postal code: 8000
Telephone:	021 444 7793		Cell: +27(0)
E-mail:	Rachel.schnackenberg@capetown.gov.za		Fax: ( )
Name of Person in control of the land:	City of Cape Town		
Name of contact person for person in control of the land:	Rachel Schnackenberg		
Postal address:	Civic Centre, Hertzog Boulevard		
	Cape Town		Postal code: 8000
Telephone:	021 444 7793		Cell: +27(0)
E-mail:	Rachel.schnackenberg@capetown.gov.za		Fax: ( )

Duplicate this section where there is more than one Municipal Jurisdiction Municipality in whose area of jurisdiction the proposed activity will fall:	City of Cape Town: Environmental and Heritage Management Branch - Central Region	
Contact person:	Maurietta Stewart	
Postal address:	Metro Office, 44 Wale Street, 8th floor	
	Cape Town	Postal code: 8000
Telephone	021 400 6519	Cell:
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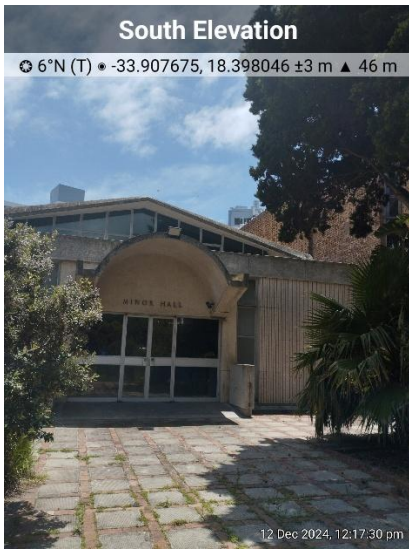
SECTION B: CONFIRMATION OF SPECIFIC PROJECT DETAILS AS INCLUDED IN THE APPLICATION FORM

1.	Is the proposed development (please tick):	**New**	✓	Expansion	
2.	Is the proposed site(s) a brownfield of greenfield site? Please explain.				

The proposed site on Erf 2187, Three Anchor Bay, Green Point is a brownfield site which has been entirely transformed.

Existing facilities on the site include the Colin Eglin Sea Point Public Library, Sea Point Civic Centre and Hall, Fives Football, Green Point Sports Club, Glen Green Point Sports Centre (including the Atlantic Green Point Bowling Club), Pinocchio Crèche, and the Western Province Bridge Centre for the Western Cape Bridge Union. Additional on-site infrastructure includes an electrical substation, small outbuildings, internal roads and parking areas.

Photograph 1: Sea Point Public Library



Photograph 2: Major Hall part of the Civic Centre

Photograph 3: Atlantic Green Point Bowling Clubhouse

Photograph 4: Tarred surface on site south of the Western Province Bridge Club

Photograph 5: Western Province Bridge Club

Photograph 6: Electrical substation

3.	For Linear activities or developments				
3.1.	Provide the Farm(s)/Farm Portion(s)/Erf number(s) for all routes:				
3.2.	Development footprint of the proposed development for all alternatives.				m²
3.3.	Provide a description of the proposed development (e.g. for roads the length, width and width of the road reserve in the case of pipelines indicate the length and diameter) for all alternatives.				
3.4.	Indicate how access to the proposed routes will be obtained for all alternatives.				
3.5.	SG Digit codes of the Farms/Farm Portions/Erf numbers for all alternatives				
3.6.	Starting point co-ordinates for all alternatives				
	Latitude (S)	°	'	"	
	Longitude (E)	°	'	"	
	Middle point co-ordinates for all alternatives				
	Latitude (S)	°	'	"	
	Longitude (E)	°	'	"	
	End point co-ordinates for all alternatives				
	Latitude (S)	°	'	"	
	Longitude (E)	°	'	"	
Note: For Linear activities or developments longer than 500m, a map indicating the co-ordinates for every 100m along the route must be attached to this BAR as Appendix A3.					
4.	**Other developments**				
4.1.	Property size(s) of all proposed site(s):				45000m²
4.2.	Developed footprint of the existing facility and associated infrastructure (if applicable):				45000m²
4.3.	Development footprint of the proposed development and associated infrastructure size(s) for all alternatives:				40000m²
4.4.	Provide a detailed description of the proposed development and its associated infrastructure (This must include details of e.g. buildings, structures, infrastructure, storage facilities, sewage/effluent treatment and holding facilities).				

Project Background

The applicant, the City of Cape Town Property Development Department, is proposing a high-intensity mixed-use development on Erf 2187 in Three Anchor Bay. The site is approximately 4.5 hectares in size, municipal-owned, and currently zoned as Public Open Space (OS2). The site is bounded by Sea Point Main Road (M61) to the south, Helen Suzman Boulevard and Beach Road (M6) to the north, and Three Anchor Bay Road to the west. These roads contribute to good connectivity in the east-west directions to and from the site. MyCiTi and Golden Arrow bus services are available within walking distance to the site.

Notwithstanding the site's prime location, the site is currently underutilised. The bowling clubs that used to occupy significant land on the site are no longer active and the club houses are now being leased for various other low-intensity community uses or stand vacant. There are various sport and public recreational facilities in the vicinity of the site and the City's Spatial Development Framework earmarks the site for infill development that would ensure better utilisation of this well-located land parcel close the City CBD and regional community and recreational facilities.

Council's in principle approval for the transfer of the site was obtained in March 2026 in accordance with the Municipal Asset Transfer Regulations, with the intention of disposing the site via a competitive bidding process. The site will be released prior to the completion of the statutory

approval process; however, transfer to the successful bidder will only occur once all required statutory approvals, including those in terms of NEMA and the MPBL, have been obtained.

Design Process

The proposed concept design presented in this application for approval has been the subject to an extensive consultation process which began in February 2025, undertaken in parallel with technical and professional involvement to identify opportunities and constraints associated with the site. The consultation process involved the following phases and activities which have informed and refined the concept design:

- **Pre-registration Phase (February – April 2025):** A background information document summarising the project proposal, engagement timeline, project timeline and opportunities to register and participate were made available for potential I&APs.
- **Information Sharing Phase (April – May 2025):** Included information about the Online Public Meeting held on the 7th of May 2025 and an in-person Open House on the 14th of May 2025 where the public were invited to share information about the project site. The purpose of these engagements was to provide the public with information about the project and to allow the public to share inputs on how the site should be developed.
- **Draft Concept Design Phase: (November – December 2025):** Information about the draft development concept design was made available to the public for comment between Thursday 06 November and Monday 08 December 2025.
    - 06 November 2025: a draft development concept information document summarising the project proposal, public engagement timeline, proposed draft urban design and opportunities to register and participate were made available to I&APs.
    - 12 November 2025: posters were displayed at the Open House event and made available afterwards on the project website with more detail about the proposed draft development concept design.
    - Comments received during this phase have been considered, responded to (**Appendix F**) and incorporated into the proposed Concept Design presented in the draft BAR, where appropriate.
- Technical inputs and design indicators have been received from the following professional reports and assessments:
    - Urban design (ACG Architects)
    - Landscape report (ACG Architects)
    - Planning and land use management (@Planning)
    - Civil engineering (EAS Engineers)
    - Stormwater management (EAS Engineers)
    - Electrical engineering (BVi Consulting Engineers)
    - Heritage assessment (Lize Malan and Cindy Postlethwayt)
    - Visual assessment (David Gibbs)
    - Transport assessment (ITS)
    - Socio-economic assessment (Urban Econ)

Proposed Concept Design

General overview

The proposed concept design has undergone an iterative design process and the various elements, as shown in Figure 7 and Figure 8 are described below:

Civic node

- Sea Point Civic Centre and Hall
- Existing Sea Point Public Library with a proposed extension and additional development bulk envisaged above the existing building footprint (design subject to heritage, structural, visual impact and architectural specialist input at Precinct Plan stage, consistent with the conditions set out in the Heritage Impact Assessment).
- Above ground parking bays and access to basement parking
- New location for a crèche

Residential and commercial components

- Residential (including affordable, middle- and high-income housing)
- Hotel space
- Retail space
- Office and other business land uses
- Internal roadways and access to basement parking

Basement parking

- Three levels

Internal roads

- Class 5B (road width = 6.4 m and road reserve = 12 m)
- Class 5C roads (road width = 5.5 m and road reserve = 10 m).

Green space

- Hard and soft landscaping internal to the site along access roads and internal pedestrian routes.
- Retention and preservation of eucalyptus trees on the eastern side of the site.
- Retention and preservation of the trees bordering the site along Sea Point Main Road forming part of the extended Cape Town Fan Walk.

Figure 7: Overall Conceptual Framework Plan (ACG architects)

Proposed Massing

The proposal avoids continuous building blocks through separation of building clusters, the introduction of visual corridors, changes in building height, and articulation of façades. This fragmentation reduces perceived bulk and allows the development to be read as a collection of related buildings rather than a single megastructure. This approach ensures that development is perceived as part of the established urban fabric rather than as a singular large-scale intervention.

Along Main Road, a consistent four-storey podium establishes a strong and active street edge. Above this podium, the majority of tower elements rise to approximately 30 meters. At key locations, identified as Points A, B, and C, the building heights increase to 45 meters. These taller elements function as landmarks and visual markers along Main Road, framing important moments along the route and creating identifiable bookends within the urban structure.

Along Helen Suzman Boulevard, the development adopts a similar approach, with buildings generally formed by a four-storey podium that engages the street, supporting taller tower elements rising to 45 meters. This reinforces the prominence of the boulevard while maintaining a consistent urban edge.

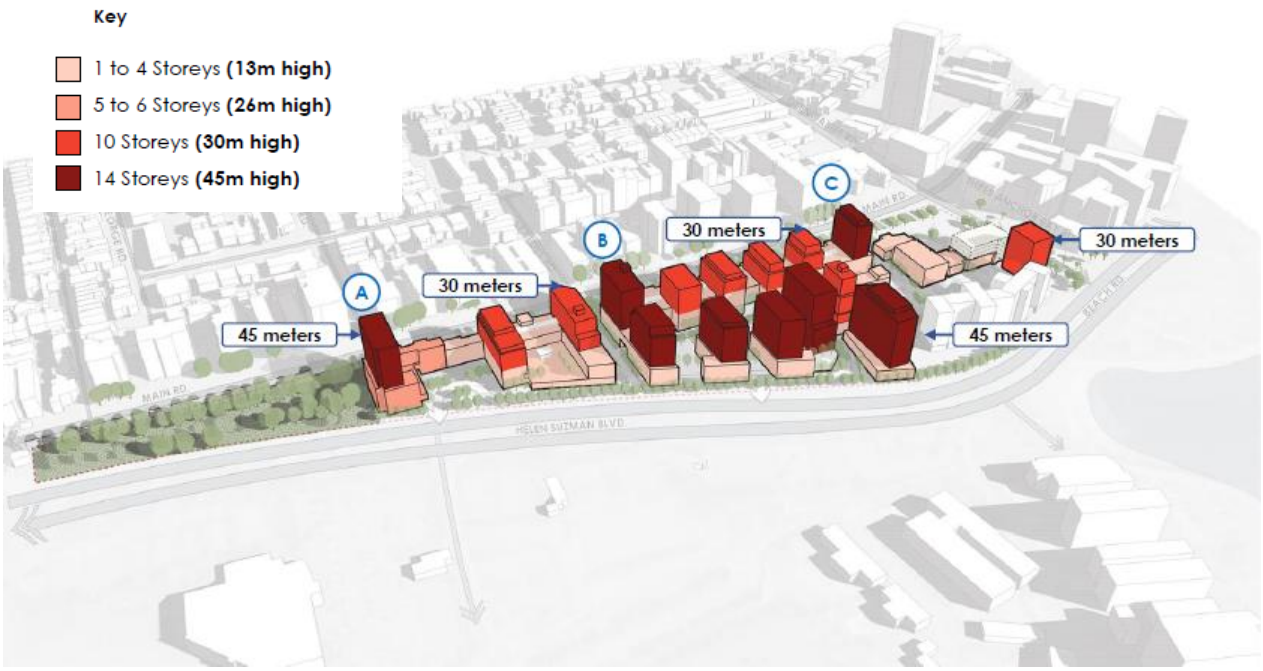


Figure 8: Proposed building heights associated with the concept design (ACG architects)

Land Portions

Council's in principle approval to transfer the site was obtained in March 2026 in terms of the Municipal Asset Transfer Regulations of 2008 (MATR), and the intention is for the site to be disposed of via a competitive bidding process. The release of the site will take place before the statutory process is complete. However, the transfer of the site to the successful bidder will take place after the conclusion of statutory approvals in terms of NEMA and the MPBL are concluded.

Rezoning of the site will be required to accommodate portions of the site as described below (see Figure 9):

- **Civic Node Portion (CO2)** will continue to accommodate the Colin Eglin Library and Sea Point Hall as community facilities and will contain sections that will be operated by the City of Cape Town. Other community uses can also be accommodated within the re-purposed spaces. The existing library will be refurbished and extended, and a new Early Childhood Development (ECD) centre will be located next to the hall to further facilitate the clustering of community facilities and a safer drop-off facility. Limited business uses can be incorporated to activate the civic node.
- **Mixed-use Portion (GB6)** will accommodate the primary development components of the project including residential, retail and commercial spaces.
- **Open Space Portion (OS3)** will include the existing eucalyptus tree glade on the eastern side of the site.

Figure 9: Proposed land zoning for erf 2187

As per the first draft of the Concept Design that underwent a non-statutory public engagement process in November – December 2025, the existing library and civic centre were proposed to be retained and include a sensitively designed northward extension to the library. The revised Concept Design presented in this report proposes an additional aboveground parking structure and development bulk envisaged above and behind the library building footprint (in the parking area). Details regarding the potential development within the civic node are provided in Section H of this report.

Buildings to be retained

The proposed concept design includes the retention of the Colin Eglin Sea point Library and Civic Centre as the cultural and architectural anchors of the site. These buildings are strong examples of Modernist architecture and are considered of heritage significance. The buildings will be sensitively restored and upgraded to enhance functionality while maintaining their architectural integrity.

The existing crèche, former bowls clubhouse, Western Cape Bridge Club and electrical substation buildings are not considered heritage-worthy and will be demolished.

Description of the Proposed Development

The proposed concept design includes the following objectives:

- **Civic Node and Crèche Relationship**: The crèche is to be located in proximity to the civic node, supporting community-focused activities and shared public use.
- **Retail activation**: create continuity with the surrounding retail context via retail offerings along Main Road, internally, associated with the hotels and potential outdoor café in the civic node forecourt.
- **Vehicular network:** designed to enhance permeability and strengthen connectivity between the site and surrounding area for vehicles and pedestrians.
- **Basement parking:** to accommodate the anticipated development's needs via three levels of basement parking.
- **Residential blocks:** form part of the primary land use and constitute most of the built form providing a mixture of open market and market-led affordable housing. These generally located above ground floor and positioned towards the interior of the development to establish appropriate public–private interfaces and ensure separation from the most active public areas.
- **Hotel components:** strategically located on prominent sites within the development capitalising on views and creating landmark presence and gateway condition along Main Road.

- **Green network:** to build on the existing site conditions and informants to establish a connected landscape framework that integrates the development with the surrounding context including the adjacent promenade. This includes the retention of the existing eucalyptus tree glade on the eastern side of the site and existing Fan Walk treed avenue along Main Road. Additional landscaping and tree planting is recommended to create a comfortable pedestrian environment.
- **Pedestrian and public space network:** to improve connection between the site and surrounding urban context including the sensitive upgrade of the civic forecourt, enhancement of the existing Fan Walk via the activation of a retail edge creating a vibrant pedestrian environment, and internal green spaces to serve residents living in the precinct with recreational and/or social space.

Stormwater (Stormwater Management Plan, 2026 – Appendix L3)

The site naturally slopes towards Helen Suzman Boulevard (south to north), and there are areas that drain stormwater to existing inlet structures and underground pipe networks within the site and along the surrounding roads, discharging into the ocean. Attenuation of stormwater on site is not required due to the site's close proximity to the ocean, and the focus of the stormwater management plan is to improve the quality of stormwater. The appropriate stormwater management includes a combination of source controls, local and downstream controls. The proposed stormwater strategy includes water sensitive urban design (WSUD) measures such as podium bioretention systems and grass-lined swales, to improve stormwater quality. The selected sustainable urban drainage systems (SUDS) controls include green roofs, rainwater harvesting, conveyance swales with impermeable base, engineered podium bioswales lined with underdrain, and sand filters. These measures have been recommended to meet the municipality's pollutant removal performance outcomes for brownfield sites, namely a minimum of 80% removal of Total Suspended Solids (TSS) and 45% removal of Total Phosphorus (TP.

Due to the proposed concept including a full-footprint basement, natural infiltration is not possible, and engineered bioswales/bioretention planters remain effective in this context. When a bioswale is placed over a slab the system functions as a podium bioretention unit and the stormwater is filtered through engineered media undergoing pollution adsorption, microbial activity and plant uptake. The stormwater is then conveyed via underdrains to grid inlet manholes (which also serve as overflow chambers during major storm events), discharging into the existing stormwater network.

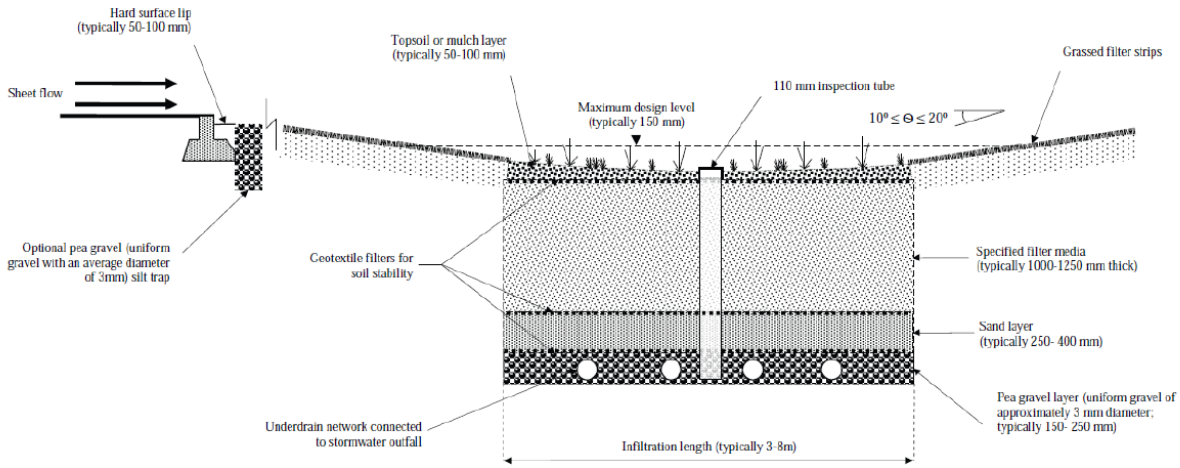


Figure 10: Cross section of the typical design for bio-retention areas extracted from the SWMP (page 20)

The proposed development requires the relocation of existing municipal stormwater infrastructure to accommodate the proposed building footprint. The affected stormwater infrastructure is to be realigned and reconstructed to ensure the capacity, functionality and downstream conveyance of the network is preserved. An 825mm diameter pipeline will need to be relocated with two options available: Option 1 is moving the pipeline slightly away from the proposed building footprint and retaining its original crossing across the site in the proposed Open Space 3 area. Option 2 is relocating the pipeline to run parallel along the existing stormwater pipeline along Main Road and then deviating to the nearest access road to tie back onto the 750mm diameter pipeline. Option 2 can be considered if there are any developable constraints that may be envisioned where the pipeline crossing the site may not be possible in future development. However, if Option 1 is preferred then this pipeline that will traverse the portion of land proposed for rezoning to Open Space 3 will require formal registered servitude.

There is various maintenance guidelines recommended to ensure long-term SUDS functionality including the inspection of stormwater infrastructure, and these have been included in the EMPr.

For detailed stormwater management please refer to the Stormwater Management Plan (Appendix L3)

Civil services (Civil Services Report, 2026 – Appendix L2)

The existing sewer line located on the western side of the site is to be removed and relocated to the roadway. The new proposed sewer line is to run in the center of the road in the service corridors connecting directly to the relocated sewer pipeline. In addition, the existing sewer line crossing the northern side of the site is to be removed.

The highest calculated Average Dry Weather Flow (ADWF) for the proposed development is estimated at 758 kl/day, and Peak Dry Weather Flow (PDWF) is estimated at 28.91 l/s, and Peak Wet Weather Flow when considering an infiltration rate of 15% is 33.25 l/s. Based on the formal capacity letter issued by the City of Cape Town on 8 June 2026, the proposed development is confirmed feasible from a water and sewer services perspective. The assessment confirms that:

- The water supply system has sufficient capacity in terms of resource availability, treatment. Storage and conveyance to accommodate the estimated potable water demand of approximately 1045kl/day.
- The water reticulation network has adequate pressure and flow capacity to supply the development without requiring bulk upgrades.
- The wastewater treatment system serving the site, namely the Green Point Wastewater Treatment Works, which discharges via the Green Point marine outfall, has sufficient spare capacity to accommodate the estimated sewer flows.
- The 900 mm diameter bulk sewer system has sufficient capacity to convey the development flows.
- The 150mm diameter sewer (feeding the 225mm diameter pipeline along Bay Road) has insufficient capacity to convey the full development sewer flow. However, capacity can be achieved either by upgrading the small 150mm pipeline to the 900mm system or distributing flows across two sewer connections, subject to City approval.

Note that originally Scenario 1A (1045kl/day) was adopted as the AADD for City of Cape Town to do their capacity checks. Following the inclusion of the additional development on Parcel 1, the updated Scenario demand increases to approximately 1080kl/day. Similarly, the sewer demand based on 80% of the AADD in accordance with CoCT policy increased from 836kl/day to 864kl/day. The impact is incremental and from a capacity planning perspective, this variation is considered minor and does not materially alter the originally selected AADD for capacity evaluation. Accordingly, we do not anticipate that this update will alter the outcome of the anticipated capacity letter from City of Cape Town.

Localized upgrades required in the existing 150mm diameter sewer reticulation pipeline however no bulk infrastructure upgrades are required. The development is considered feasible subject to compliance with the City's conditions as per the City's capacity letter, included as Annexure E of the Civil Services Report (Appendix L2 of this draft BAR). The Civil Services Report includes diagrams of the proposed water layout (page 39) and proposed sewer layout (page 40).

Electricity (Electrical Report, 2026 – Appendix L4)

The project presents an opportunity to strengthen the grid in the immediate vicinity and surrounds. New medium or high voltage connections and substations will need to be developed and these in turn could bolster the capacity and robustness of the electricity infrastructure in the area.

Existing electrical infrastructure poses a constraint on the development. There are buried services belonging to the City of Cape Town. Although these cables can be relocated where necessary, they will need to be accommodated along the same general route. These can be accommodated along public roads as far as possible, but servitudes or rights-of-way will need to be registered where necessary.

Infrastructure such as Helen Suzman and Three Anchor Bay Roads all pose constraints on the possible solutions for electrical infrastructure and will need to be carefully considered. The latest development framework also identifies the requirement for registered servitudes within the property. These include:

- Electrical servitudes required for the protection and maintenance of existing and proposed electrical infrastructure
- A servitude in favour of CPOA to preserve access arrangements;

- Access servitudes required by the City of Cape Town for operation and maintenance of electrical substations and associated infrastructure.

These servitudes will need to be incorporated into future planning and detailed engineering design processes.

Existing services on site

The site and surrounding area are serviced by a combination of high-voltage (HV), medium-voltage (MV), and low-voltage (LV) infrastructure. Key elements include:

- HV (66 kV) and MV (11 kV) underground cables along Helen Suzman Road,
- Existing transformers and mini substations,
- Low-voltage distribution networks supplying adjacent properties,
- Telecommunications infrastructure within shared service corridors.

An existing substation within the development footprint will be affected by the proposed layout and will require replacement. Although noted in the Heritage Impact Assessment (HIA – Appendix G1) as a heritage resource of architectural significance (IIIB), the HIA concludes that "Although the loss of the electrical substation building is regrettable, the building is not regarded as of sufficient significance to warrant its retention at the cost of efficient development of the site".

Telecommunication infrastructure

An existing City telecommunications duct containing fibre optic cabling enters the site from Three Anchor Bay Road and distributes to CPOA Sea Point Place, the Sea Point Library, and the Sea Point Civic Centre. A request for services information was submitted on the CoCT wayleave management portal.

MTN and Telkom, Openserve have provided wayleave information (refer to the Electrical Services Report – Appendix L2 for more details). Wayleave requests (existing services) have been submitted to the Frogfoot, Dark Fiber Africa and Liquid Telecom service providers, and feedback is awaited. Correspondence received from Vumatel indicates that there are no approved wayleaves within the subject area.

Load calculation

An initial estimate for this precinct is 6.7 MVA. The load assessment has been based on the highest anticipated development intensity to provide a conservative estimate of future electrical demand and the associated bulk infrastructure requirements. The calculated load is suitable for feasibility-level planning and indicates that, while the demand is substantial, it can be accommodated subject to the implementation of the required infrastructure upgrades and service diversions identified by the City.

Capacity

A new substation will be required, either as a free-standing facility on a 20 × 14 m erf with direct street access, or incorporated within the new proposed building with a minimum footprint of 20 × 10 m. The substation will include a medium-voltage switch room, transformer room, and toilet facilities. The substation must be situated at street level with direct access to accommodate

medium-sized trucks. The internal height of the substation is required to be 3,200 mm, with additional trenches of 1,100 mm depth.

The electrical infrastructure will be implemented in phases aligned with the overall development programme to optimise capital expenditure, minimise disruption to existing services and ensure that electrical capacity is available as development progresses

Supply strategy and point of connection

The proposed point of connection for the development is the Mouille Point 132/11 kV Substation, located west of the site. This substation has been identified as the preferred supply point due to its proximity and its role within the local bulk electrical distribution network. **A new three-feeder-group of 11 kV underground cables will be required to connect the site to this substation**. The final point of connection, routing of feeder cables, and available capacity will be confirmed through further engagement with the City of Cape Town during subsequent project stages.

Demolitions and relocations

The existing electrical infrastructure within and adjacent to the site will require modification to accommodate the proposed development. This includes the removal of redundant infrastructure and the reconfiguration of existing services. This work will be carefully planned and coordinated to minimise disruption and ensure continuity of supply to surrounding areas.

An existing substation within the development footprint will be affected by the proposed layout and will require replacement. A new substation will be constructed and fully commissioned prior to any decommissioning activities. Once all loads have been successfully transferred, the existing substation will be de-energised, decommissioned, and demolished. All demolition works will include the removal of associated equipment and structures and will be carried out in accordance with applicable safety and environmental requirements.

New substations

A new Three Anchor Bay Substation will be developed in accordance with City of Cape Town standards. The substation may be constructed as a free-standing facility or integrated within the proposed development, depending on final design coordination. It will include the required switchgear, transformer capacity, and associated facilities to accommodate the development load. In addition to the primary substation, smaller substations will be strategically located across the site to support local distribution requirements. All new substations will be fully operational prior to the decommissioning of any existing infrastructure.

Summary of key electrical infrastructure requirements include:

- A new substation to accommodate the development load,
- New 3-feeder-group of underground cables from Mouille Point 132/11kV substation,
- Relocation and/or protection of existing buried services including medium and high voltage cables and dedicated feeds to the SABC studios,
- Internal medium- and low-voltage reticulation systems.

Therefore, the development concept accommodates **three new mini substations (6m × 4m each) and one primary substation (20m × 10m)**. To optimise developable land, the primary substation is proposed to be integrated within a new building. It is incorporated within the retail component, where servicing can occur from the rear and where the land use above is retail, thereby minimising

potential impacts on residential functions. The locations of the new substation and mini substations are shown in Figure 11 below, along with the proposed servitudes, accesses, delivery yard and refuse pick-up area.

The proposed electrical network shall be designed with consideration for reliability and future expansion.

Figure 11: Proposed locations of the electrical substation and mini-substations (ACG architects, 2026)

Conclusion

The proposed Three Anchor Bay development, with an estimated demand of approximately 6.7 MVA, is **considered feasible from an electrical engineering perspective**. The development will require new electrical infrastructure, including a substation and feeder connections. Implementation will be subject to confirmation of supply capacity, statutory approvals, and detailed design. With appropriate planning and coordination, the required infrastructure can be successfully implemented.

Landscape (Landscape Architecture Report, 2026 – Appendix L5)

Tree Survey

A Tree Survey undertaken by ACG Architects (2026) as part of their landscape plan which identified and assessed the trees present on the site, including their species type, size, age and condition. The survey recorded a total of 239 trees within the proposed development area and along the street edges. Accordingly, mature trees defined as those planted more than 16 years ago, should be retained and protected wherever feasible as part of the development.

Based on the information gathered each tree was assigned a recommended Tree Protection Zone (TPZ). The TPZ, also referred to as the critical root zone, is generally located beneath the tree canopy/dripline (Figure 12). It is typically calculated using the tree's Diameter at Breast Height (DBH), measured 1.4 m above the ground and the canopy spread. Full TPZ calculations are provided in **Appendix L5** (Landscape Report, 2026).

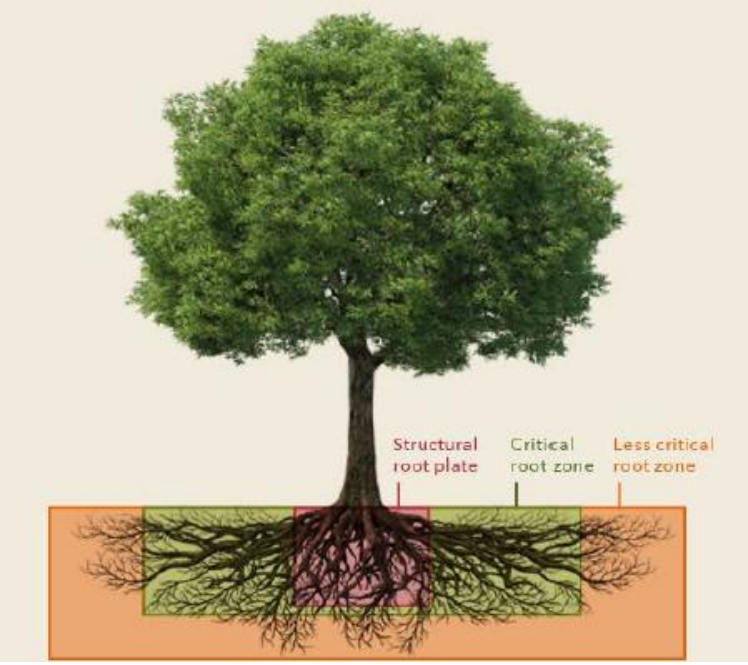


Figure 12: CoCT infrastructure programme trees (Extracted from Landscape Report: ACG Architects, 2026)

The TPZ aligns with the need to preserve the trees identified in the Heritage Impact Assessment undertaken by Lize Malan and Cindy Postlethwayt (2026) which are considered resources of historical significance. The mature eucalyptus trees possess aesthetic and cultural value and make an important contribution to the green character and sense of place associated with the Common. As such, the trees have both historical and contextual significance within the broader heritage landscape of the area, and the proposed TPZ helps ensure their preservation.

The critical root zones (CRZs) of the surveyed trees have been identified on the Tree Plan, with an average setback of approximately 6 m from each tree stem, depending on the species and size of the tree. Figure 13 shows an example of a cross section demonstrating a 6 m TPZ from the site boundary and existing treeline, pushing the development back to the location indicated by the orange line. The identified TPZ's have been incorporated into the proposed draft Concept Design and landscape plan (Figure 3) as shown in this BAR. In areas where larger protection zones are required to safeguard retained trees, the building and basement footprints have been stepped back accordingly and may not extend beyond the indicated development boundary.

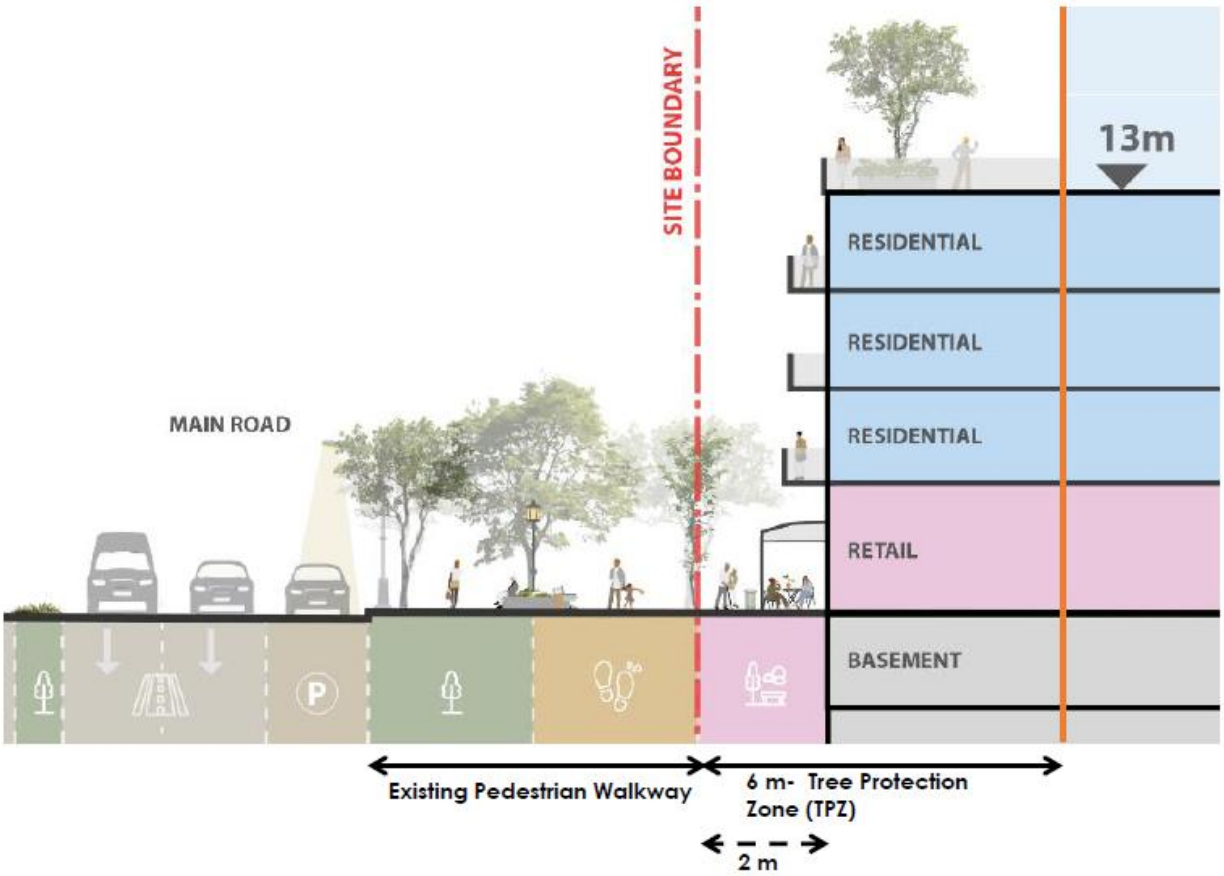


Figure 13: Example of a cross section showing a TPZ of approximately 6 m (ACG Architects, 2026). The orange line indicates the new location of the development in response to the required TPZs'

The TPZ establishes a protected buffer around each tree within which construction-related activities are restricted to safeguard tree health, structural stability, and long-term survival.

Protection measures include:

- No development, excavation, paving or trenching should occur within the TPZ,
- Where possible, all construction-related activities should be kept outside of the dripline of the tree.
- The following activities should be avoided within the TPZ:
    - Soil compaction,
    - Parking of heavy machinery beneath trees,
    - Storage of construction materials,
    - Alteration of existing soil levels around trees,
    - Installation of hard surfacing close to tree trunks, and
    - Trenching through root zones.

Alternatives to Tree Removal (transplanting and retention options):

1. **Tree transplanting:**
    - Transplanting should be prioritised as an alternative to removal where feasible,
    - A qualified arborist or skilled tree worker should be consulted to assess suitability and advise on appropriate transplanting methods.
2. **Retention and ecological value:**
    - Mature and significant trees should be retained wherever possible, given their ecological, cultural and aesthetic importance,

- Even mature exotic trees may contribute significantly to cultural landscapes and local character and should therefore not be removed by default,
- Trees should only be removed where trees pose an unmanageable risk to people, property, or infrastructure.

Landscape Plan

The Landscape Masterplan incorporates hard and soft recreation and pedestrian spaces for public and resident enjoyment (see Figure 14 below):

1. The retention of the existing Eucalyptus trees in a hard landscape area. This space could be utilized as a forecourt to the hotel facility and could be a multipurpose space used to accommodate market space, art installations or serve as parking overflow.
2. The existing Fan Walk treed avenue will be retained to preserve its distinctive character and to strengthen pedestrian connectivity.
3. Landscaped sidewalks and tree avenues identify main road network and assist with improving the pedestrian environment. These are planned to incorporate swales along the pedestrian route between the street parking and walkways.
4. Additional tree planting along Helen Suzman Boulevard will act as a visual screen. This tree line is planned to extend along the route towards the promenade to improve the pedestrian route.
5. Bioswales have been incorporated along Helen Suzman for stormwater management.
6. Soft landscaped courts for recreation and as an amenity for residents.
7. Hard court/plaza.

Figure 14: Landscape master plan (ACG Architects, 2026)

Planting palette

The planting palette has been provided to guide planting selection aligned to the specific zone in the landscape or activity planned for the space. Four areas have been indicated in the landscape plan and may be categorized as **edge zones**, which are roads, parking areas and interfaces, **transition zones**, which are typically pedestrian routes. **SUDs zones**, which would contain the

bioswales and stormwater systems, and lastly, the **parks and activity areas**, which are either hard courts and plazas or soft landscaped areas for recreation use.

Figure 15: Planting palette for proposed development (ACG Architects, 2026)

4.5.	Indicate how access to the proposed site(s) will be obtained for all alternatives.

Erf 2187 is bounded by Helen Suzman Boulevard, Sea Point Main Road and Three Anchor Bay Road. Current site access to the library and hall is obtained off Three Anchor Bay Road and Sea Point Main Road. There is additional access to parking on the site off Helen Suzman Boulevard, and this internal road connects to Sea Point Main Road between the Bridge Club and Bowls Clubhouse.

Within the existing civic node, access will be retained, including its two existing left-in/left-out access points off Three Anchor Bay Road and Main Road. Both have a two-lane cross-section, with one inbound and one outbound lane, and are stop-controlled on the development side. Three new accesses are proposed along Main Road. The primary site access will be positioned opposite Richmond Street and is proposed to be signalised. This access will have one lane per direction. In addition, two priority stop-controlled accesses are proposed along Main Road, one opposite St Bedes Road and one opposite Hill Road. Each access will have a two-lane cross-section with one lane in each direction and be stop-controlled on the development side. The access opposite Hill Road will serve the hotel exclusively.

It is proposed that the two existing accesses along Helen Suzman be upgraded to one left-in-only access (approximately 320 m east of the Helen Suzman Boulevard/Beach Road intersection) and one left-out-only egress (approximately 140 m east of the intersection) to improve operational efficiency and safety. The focus was on optimising the available spacing for these accesses. All proposed intersections will comply with the required intersection setbacks as determined by the transport engineer.

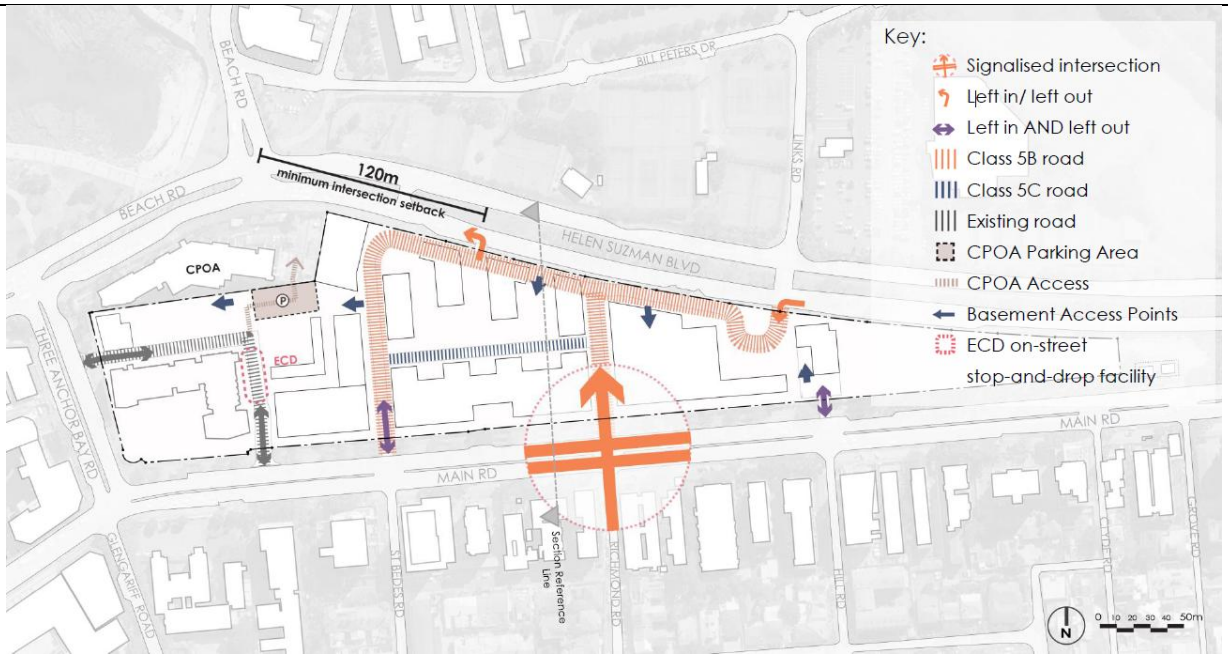


Figure 16: Potential access points for the proposed mixed-use development on Erf 2187, Three Anchor Bay (ACG architects)

4.6.	SG Digit code(s) of the proposed site(s) for all alternatives:			
	C01600210000218700000			
4.7.	Coordinates of the proposed site(s) for all alternatives:			
	Latitude (S)	**33°**	**54'**	**26"**
	Longitude (E)	**18°**	**23'**	**57"**

SECTION C: LEGISLATION/POLICIES AND/OR GUIDELINES/PROTOCOLS

1. Exemption applied for in terms of the NEMA and the NEMA EIA Regulations

Has exemption been applied for in terms of the NEMA and the NEMA EIA Regulations. If yes, include a copy of the exemption notice in Appendix E18.	YES	**NO**

2. Is the following legislation applicable to the proposed activity or development.

The National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("ICMA"). If yes, attach a copy of the comment from the relevant competent authority as Appendix E4 and the pre-approval for the reclamation of land as Appendix E19.	YES	**NO**
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) ("NHRA"). If yes, attach a copy of the comment from Heritage Western Cape as Appendix E1.	**YES**	NO
The National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). If yes, attach a copy of the comment from the DWS as Appendix E3.	YES	**NO**
The National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA"). If yes, attach a copy of the comment from the relevant authorities as Appendix E13.	YES	**NO**
The National Environmental Management Waste Act (Act No. 59 of 2008) ("NEM:WA")	YES	**NO**
The National Environmental Management Biodiversity Act, 2004 (Act No. 10 of 2004 ("NEMBA").	YES	**NO**
The National Environmental Management: Protected Areas Act, 2003 (Act No. 57 of 2003) ("NEMPAA").	YES	**NO**
The Conservation of Agricultural Resources Act, 1983 (Act No. 43 of 1983). If yes, attach comment from the relevant competent authority as Appendix E5.	YES	**NO**

3. Other legislation

List any other legislation that is applicable to the proposed activity or development.

Spatial Planning and Land Use Management Act No. 16 of 2013

The Spatial Planning and Land Use Management Act, 2013 (SPLUMA) is a framework act for all spatial planning and land use management legislation in South Africa. It seeks to promote consistency and uniformity in procedures and decision-making. Other objectives include addressing historical spatial imbalances and the integration of the principles of sustainable development into land use and planning regulatory tools and legislative instruments.

The proposed development of erf 2187, Three Anchor Bay, Green Point must align with the following SPLUMA principles:

- The principle of **Spatial Justice**, which recognises the need to redress past spatial and other development imbalances through improved access to and use of land.
- The principle of **Spatial Sustainability**, which recognises the requirement to promote land development in locations that are sustainable and limit urban sprawl.
- The principle of **Efficiency**, which recognises the requirement for redevelopment to optimise the use of existing resources and infrastructure.
- The principle of **Spatial Resilience**, whereby flexibility in spatial plans, policies and land use management systems are accommodated to ensure sustainable livelihoods for the communities most vulnerable to economic and environmental shock.
- The principle of **Good Administration** requires that all spheres of government adopt an integrated and coordinated approach to land use and development, ensure that all applicable requirements are met, and that policies, legislation, and procedures are clearly defined, transparent, and accessible in order to inform and empower members of the public.

Development Facilitation Act (Act 67 of 1995)

The principles of the Development Facilitation Act (Act 67 of 1995) that are applicable to the proposed concept design are described in section 3(1) and include the need for policy, administrative practice and laws to promote efficient and integrated land development by promoting the integration of the social, economic, institutional and physical aspects of land development. This includes promoting the availability of residential and employment opportunities in close proximity to or integrated with each other, and promoting diverse combination of land uses at the level of single erven .

Appropriate, integrated, higher-density development is indicated in this Act for supporting a range of social services and facilities, integrated movement modes and public transport, and mixed land uses. This Act has informed the policies that underpin the proposed development, including the identification of the site in the Municipal and District SDF's as being earmarked for civic and residentially-led mixed use.

Municipal By-laws

By-laws of the City of Cape Town Metropolitan Municipality with direct relevance to the proposed development include:

- Municipal Planning By-law (2015), as amended, which regulates land use and rezoning of the site or a portion of the site i.t.o. Section 42(a) and/or consent use application i.t.o. Section 42(i).
- Stormwater Management By-law (2005), which regulates stormwater management in the City of Cape Town and prohibits the discharge of any substance other than stormwater into the stormwater system without written consent and restricts any activities that may damage or pollute the system.
- Wastewater and Industrial Effluent By-law (2006), which regulates the discharge of wastewater into the municipal sewer system and sets standards for effluent quality.
- Integrated Waste Management By-law (2009), which regulates waste minimisation, storage, collection, and disposal.
- Traffic By-law (2021), which governs traffic management, access, parking, and movement within the road network.
- Air Quality Management By-law (2010), which regulates emissions and activities that may impact on ambient air quality.
- Outdoor Advertising and Signage By-law (2001), as amended, which regulates the erection and display of signage.

4. Policies

Explain which policies were considered and how the proposed activity or development complies and responds to these policies.
The proposed development is in line with a range of spatial planning and policy instruments at provincial, metropolitan, and local area scales, which are summarised in Section E of this report. They include the following: • Western Cape Provincial Spatial Development Framework (2014); • City of Cape Town Integrated Development Plan (2022-2027); • City of Cape Town Municipal Spatial Development Framework (2023); and

- Table Bay District Plan Spatial Development Framework and Environmental Management Framework (2023)

Additionally the following policies are applicable:

Cape Town Densification Policy (2012)

The 2012 Cape Town Densification Policy was established to inform the City of Cape Town Spatial Development Framework and district-level frameworks, among other objectives. In the Cape Town Densification Policy, densification is defined as "*increased use of space, both horizontally and vertically, within existing areas/properties and new developments, accompanied by an increased number of units and/or population threshold*" (page 5). Additionally, an infill development is defined as "*undeveloped or partially developed site within the existing urban fabric that is suited to urban development*". These are important and relevant definitions for the proposed concept design which proposes the densification of an infill development site (erf 2187).

Rapid and continuous low-density development and urban sprawl have been indentified as threats to the long-term sustainability of Cape Town interms of mobility, traffic, loss of biodiversity and agricultural space, and associated economic implications. Densification is seen as a necessary step to promote long-term sustainability of Cape Town's natural, urban and rural environments. Densification has the following positive impacts:

1. Reduction in consumption of valuable/non-renewable resources (i.e. land space and non-renewable fuels).
2. Supports the development of a viable public transport system.
3. Makes the city more equitable (rationalise the housing patters and improve access to amenities).
4. Facilitates economic opportunities and supports service provision.
5. Improves housing patterns and choice of house type (i.e. mix of residential densities).
6. Contributes to urban place-making and improves safety. Appropriately designed and located higher densities (in terms of form, scale, height, orientation) can provide an opportunity for place-making and the creation of attractive and safe urban environments, particularly those in proximity to public spaces (both natural and built).

According to the policy statement (DP2), "higher levels of densification will be encouraged at specific spatial locations, particularly in areas with good public transport accessibility, at concentrations of employment, commercial development and/or social amenities, and in areas of high amenity, e.g. at coastal nodes." (page 13)

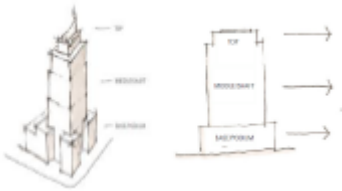
The proposed site aligns with the intentions of the Densification Policy completely, intended to optimise the use of an infill development site with good public transport accessibility, near employment opportunitites, commercial development and social amenities, in close proximity to the City's CBD.

Tall Buildings Policy and Design Guidelines (2013)

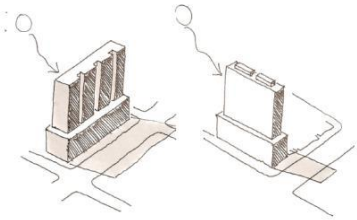
The proposed mixed-use development on Erf 2187, Three Anchor Bay has been considered in relation to the City of Cape Town Tall Building Policy (Policy Number 11907), which provides guidance for the planning, design and assessment of tall buildings within the municipal area. The policy aims to ensure that tall buildings are appropriately located, respond sensitively to their urban context and contribute positively to the public realm, skyline and surrounding built environment. Key considerations include contextual height, integration with surrounding land

uses, protection of important views and heritage resources, pedestrian-friendly ground floor interfaces, and the mitigation of impacts such as shadowing, wind and infrastructure pressure.

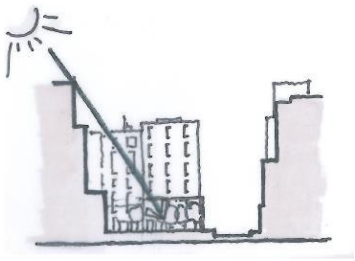
The design and layout of the proposed mixed-use development must therefore comply and take into account the following Tall Building Design Guidelines:

1. 

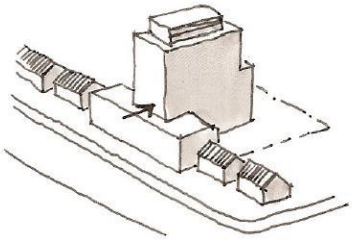
Overall Form and Massing: to ensure that all parts of a tall building are appropriately scaled and designed to relate simultaneously to a range of differing performance needs that include the pedestrian, the street and its broader surrounds.

2. 

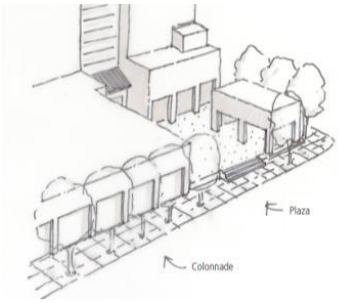
Shaft design and floor plates (in relation to other buildings): Avoid casting big shadows by orientating the base and/or building to mitigate shadows.

3. 

Open space and connections to open space: to ensure the provision of high quality, accessible and safe public spaces for the benefit of its occupants and surrounding environments.

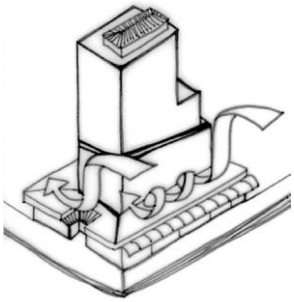
4. 

Scale of the base building (in relation to the public realm): the base building should be scaled so as to provide definition and support to existing adjacent streets, parks and open space to promote contextual integration.

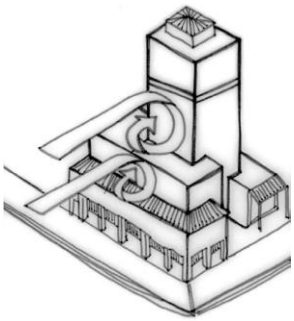
5. 

Ground floor interface and the streetscape: to ensure that tall buildings promote safe, comfortable, attractive and interesting pedestrians' environments at ground floor level. Where appropriate, tree planting, street furniture, pedestrian, lighting and public art must be introduced.

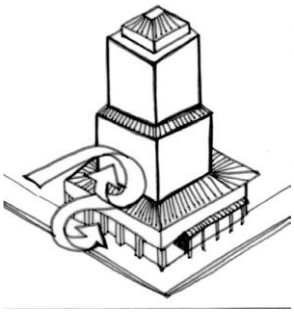
The Design Guidelines for Tall Buildings provide flexible guidance that emphasises good design practice and offer direction on the planning and design of tall buildings. Another key consideration when designing tall buildings and locating them relative to other buildings in close proximity, is the need to mitigate potential wind impacts. The following design measures can be used to mitigate wind impacts at street level:

1. 

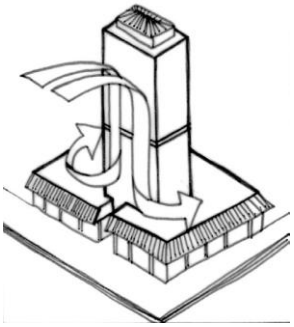
Canopies:
Use horizonal canopies on the windward face of base buildings

2. 

Stepped based buildings:
Use a step-back in base buildings to reduce the undesirable downward wind flows.

3. 

Colonnades:
Use colonnaded base to control downward wind flows on windward facades. Colonnades provide pedestrians with a choice of enjoying the calm on windy days or a nice breeze on hot days.

4. 

Roof areas of base buildings:
Use the roof areas of base buildings to mitigate against downward wind flows and improve conditions at grade for pedestrians. Landscaping the roof of base buildings can further contribute to reducing wind speeds at grade.

Cultural Heritage Strategy for the City of Cape Town (2005)

The City of Cape Town Cultural Heritage Strategy provides a framework for the identification, protection and sustainable management of cultural heritage resources within the municipal area. The strategy emphasises that heritage management should be integrated into spatial planning, land-use management and environmental decision-making processes in order to ensure that development responds appropriately to the historic, cultural and scenic qualities that characterises the city ***(Policy 12: Integration)***.

A key objective of the strategy is to identify, assess, conserve and manage heritage resources, structures and landscapes while ensuring that the values and historical associations linked to such resources are appropriately recognised and represented ***(Policy 11: Heritage Significance)***. The strategy further promotes an approach that balances the conservation of heritage resources with the need for urban development and growth, acknowledging that heritage can contribute positively to place-making, economic regeneration, tourism and the broader identity of the city. In the context of the proposed mixed-use development, the principles of the cultural heritage strategy are relevant in ensuring that the development responds sensitively to the surrounding built environment and cultural landscape ***(Policy 7: Cultural Landscapes)***.

The proposed concept design on erf 2187 has considered the presence of heritage resources, historical townscape patterns and the cultural significance of the area in order to minimise potential impacts on heritage resources. As a result, existing heritage sensitivities on the proposed development site like the Colin Eglin Library and Sea Point Civic Centre (Grade IIIA) will be retained as per the concept design. The buildings will be sensitively restored and upgraded to enhance functionality while mainting their cultural and architectural integrity. Note that while the development concepts identifies an opportunity to incorporate building bulk above the library with a sensitive lightweight addition, **this is an indicative concept that will require further detailed design and heritage approvals before it can be proceeded with.** The eucalyptus trees to the east of the site is also noted as a heritage resource for its aesthetic significance and will also be retained. This approach balances conservation with renewal, ensuring the site evolves while retaining its most meaningful and character-defining elements. The strategy also encourages the integration of heritage considerations into development planning to ensure that new developments contribute positively to the character and sense of place of their surroundings. Furthermore, the strategy promotes the sensitive reuse, enhancement and interpretation of heritage resources, recognising that development can play a role in revitalising historic areas and reinforcing the cultural identity of the city.

Overall, the proposed development concept design aligns with the principles of the Cultural Heritage Strategy, demonstrated by how heritage considerations have been integrated into the planning and design process. Refer to the Heritage Impact Assessment (**Appendix G1**) which describes the site and surrounding heritage context

5. Guidelines

List the guidelines which have been considered relevant to the proposed activity or development and explain how they have influenced the development proposal.

The following authority guidelines have been considered in the preparation of this draft BAR:

- **DEA&DP Guideline on Public Participation (2013), and Department of Environmental Affairs Public Participation guideline in terms of NEMA EIA Regulations (2017):**

These guidelines were considered in the determination of appropriate public participation strategies. All public participation requirements as stipulated in the EIA Regulations will be met, with a focus on effective engagement.

- **DEA&DP Guideline on Alternatives (2013), and DEA Guideline on Alternatives (2014):**

The provisions of the Guidelines were implemented in the Basic Assessment, through the identification and assessment of feasible and reasonable alternatives to the proposed activity, with a focus on impact minimisation.

- **DEA: Guideline for Environmental Management Plans (2005):**

This guideline was applied to inform and guide the preparation of the Environmental Management Programme (EMPr) in a manner that promotes the effectiveness of the EMPr.

- **DEA&DP Guidelines on Need and Desirability, (2013):**

This guideline informed the compilation of Section E and Appendix K of this report.

6. Protocols

Explain how the proposed activity or development complies with the requirements of the protocols referred to in the NOI and/or application form

The Procedures for the Assessment and Minimum Report Content Requirements for Environmental Themes (GN 320 of 2020) ('the Protocols') came into effect on 9 May 2020 and 30 October 2020. These protocols mandate site sensitivity verifications for identified themes on the site based on the National Environmental Screening Tool. The Screening Tool Report **(Appendix I)**, generated in May 2026, assigns sensitivities to the subject site as follows:

- **Agriculture** Theme (**Medium** Sensitivity)
- **Animal Species** Theme (**Medium** Sensitivity)
- **Aquatic Biodiversity** Theme (**Low** Sensitivity)
- **Archaeological and Cultural Heritage** Theme (**Very High** Sensitivity)
- **Civil Aviation** Theme (**High** Sensitivity)
- **Defence** Theme (**Very High** Sensitivity)
- **Palaeontology** Theme (**Low** Sensitivity)
- **Plant Species** Theme (**Medium** Sensitivity)
- **Terrestrial Biodiversity** Theme (**Very High** Sensitivity)

Additional assessments or verifications identified by the screening tool comprised:

- Landscape and visual impact assessment **(see Appendix G2 of this draft BAR)**
- Hydrology assessment **(A Stormwater Management Plan has been compiled; please see Appendix L3 of this draft BAR)**
- Socio-economic assessment **(see Appendix G3 of this draft BAR)**

In terms of the Protocols, the themes above require a site sensitivity verification followed by specialist assessments of confirmed sensitivities. The table below provides an overview of the site sensitivity as verified by the environmental assessment practitioner and confirms the assessment(s) which have been undertaken. See **Appendix M: Site Sensitivity Verification Report** for further detail.

Theme	Description	Outcome
Agricultural theme	The site is mapped as **Medium** sensitivity due to a moderate land	The site sensitivity verification **disputes** the Screening Tool

	capability in terms of the National Land Capability dataset that considers soil type and climate. This site is located on entirely transformed land, including multiple buildings, bowls and football fields, and tarred surfaces.	Rating of Medium Sensitivity for the agricultural theme and confirms the agricultural theme sensitivity to be non-existent. Therefore, no agricultural assessment or compliance statement is required
Animal Species theme	The site is mapped as **Medium** sensitivity for animal species. The two invertebrate species identified in the screening tool report are Peringuey's meadow katydid (*Conocephalus peringueyi*) and bladder grasshopper (*Bullacris obliqua*).	The proposed site in Three Anchor Bay is completely transformed with no natural vegetation, and it is not anticipated that these species will be found on site. The site sensitivity verification **disputes** the Screening Tool Rating of Medium Sensitivity for the animal theme and confirms the animal theme sensitivity to be non-existent. Therefore, no animal assessment or compliance statement is required.
Aquatic Biodiversity theme	The screening tool report mapped the site as a **Low** sensitivity for the aquatic biodiversity theme. The site inspection confirmed that there are no aquatic ecosystems on the proposed site, and no associated sensitivity is expected. The proposed site is located within 100m of the coast (Three Anchor Bay Beach). No watercourses or wetlands are located on the proposed development.	The site sensitivity verification **disputes** the Screening Tool's identification of the need for an aquatic compliance statement due to the site's location away from sensitive aquatic ecosystems.
Archaeological and Cultural Heritage theme	The site is mapped as **Very High** sensitivity for the archaeological and cultural heritage theme because it is located: • Within 5km of a Grade I Heritage site • Within 2km of a Grade II Heritage site The following existing heritage sites/sensitivities are located on the proposed development site. • Colin Eglin Sea Point Public Library (Grade IIIA) • Sea Point Civic Centre and Hall (Grade IIIA) • The Eucalyptus trees found on the site are historic and	A Notice of Intent to Develop (NID) was submitted to HWC in 2016. In response, HWC requires a visual assessment, built environment analysis, architectural and landscape guidelines, and a socio-historic assessment to be completed in addition to the Heritage Impact Assessment. The NID and Heritage Western Cape's formal response are included in **Appendix O** of this draft BAR. **A Heritage Impact Assessment has been conducted along with a Visual Impact Assessment (attached as**

	part of the larger Green Point cultural landscape. Other significant heritage sites adjacent to the development are: • Green Point Common PHS • Sea Point Promenade (Grade IIIA) The site itself does not fall within a declared or proposed Heritage Protection Overlay Zone (HPOZ), but there are three such areas in close proximity to the site: • The Sea Point HPOZ (southwest of the site, approximately 1–2 km away • Saint Bedes HPOZ (south of the site), 0.5–1.5 km away • Green Point HPOZ (southeast of the site) approximately 1–2 km away	**Appendix G1 and G2 respectively of this draft BAR).**
Civil Aviation theme	The site is mapped as **High** sensitivity for being within 8 km of other civil aviation aerodrome, between 15 and 35 km from a civil aviation radar and a major civil aviation aerodrome, as well as being between 8 and 15 km of other civil aviation aerodrome. This appears to be based on the proximity to a military and defence site likely due to Ysterplaat Airbase located approximately 7 km away from the site, which is not expected to be impacted by the proposed development. The proposed development does not exceed the limits and restrictions set out by the South African Civil Aviation Authority. For these reasons, the proposed project site has no civil aviation related sensitivities.	The high sensitivity rating is **disputed**, and a negligible sensitivity rating is confirmed. A compliance statement will not be required or prepared.
Defence theme	The proposed site is classified as **Very High** sensitivity due to proximity to a Military and Defence Site. The screening tool does not provide metadata indicating the reason for the classification under the defence theme. No formal guidance is available on the means of determining a site's	Although the site is considered to have a Very High Sensitivity for the defence theme, the Screening Tool did not identify the defence theme for an impact assessment. No negative impacts on the defence installation are expected and no specialist assessment or compliance

	sensitivity in terms of the Defence Theme. The proposed development does not comprise structures of excessive height or having other characteristics that may affect radar systems. The proposed development is consistent with the description of a low sensitivity rating and not high sensitivity, in that "No negative impacts on the defence installation are expected".	statement for defence is required.
Palaeontology theme	The palaeontology theme is rated as **Low** palaeontology sensitivity. No impacts on palaeontology are expected (as indicated in the Notification of Intent to Develop and Response from Heritage Western Cape).	No specialist study is required for this theme.
Plant Species theme	The site is classified as having a **Medium** plant species sensitivity due to the potential presence of the critically endangered and possibly extinct plant *Erepsia Promontorii*. According to SANBI's Red List of South African Plants (Klak & Raimondo, 2009), the *Erepsia Promontorii* has historically been found on the Cape Peninsula at Cape Point and Sea Point, however, this plant species has not been observed since 1950, despite numerous relocation attempts. The proposed site is highly modified due to human activity and site visits confirmed that no natural indigenous plants remain. The eucalyptus trees do not have any environmental significance but do have aesthetic and socio-historic significance.	The medium sensitivity is **disputed** and the site is confirmed to have no plant sensitivity. A specialist study or compliance statement is not required.
Terrestrial Biodiversity theme	The site is mapped as **Very High** sensitivity due to the presence of the Peninsula Shale Renosterveld (PSR). However, the site is almost entirely transformed with no remnant historical vegetation and there is no terrestrial biodiversity of concern on the site.	The Site Sensitivity Verification Report **disputes** the screening tool sensitivity rating for the terrestrial biodiversity theme, and confirms that there are no terrestrial sensitivities. No compliance statement is required.

SECTION D: APPLICABLE LISTED ACTIVITIES

List the applicable activities in terms of the NEMA EIA Regulations

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 1**	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity 19A	The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from – (i) The seashore; (ii) The littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or (iii) The sea	**A portion of the site falls within 100 metres of the highwater mark of the Atlantic Ocean.**
Activity 67	Phased activities for all activities – (i) Listed in this Notice, which commenced on or after the effective date of this Notice [;] or [(ii)] similarly listed in any of the previous NEMA notices, which commenced on or after the effective date of such previous NEMA Notices; **[where any phase of the activity may be below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold;]** (ii) Listed as activities 5, 7, 8(ii), 11, 13, 16, 27(i) or 27(ii) in Listing Notice 2 of 2014 or similarly listed in any of the previous NEMA notices, which commenced on or after the effective date of such previous NEMA Notices; where any phase of the activity was below a threshold but where a combination of the phases, including expansions or extensions, will exceed a specified threshold.	It is possible that the proposed mixed-use development is implemented in phases, with the sequencing of development components subject to the developer and detailed planning and implementation stages. Although individual phases may fall below the thresholds of applicable activities, **the cumulative extent of the development footprint, including future expansions or extensions, may exceed such thresholds.**

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Listing Notice 3**	Describe the portion of the proposed development to which the applicable listed activity relates.
Activity 4	The development of a road wider than 4 metres with a reserve less than 13,5 metres. i. Western Cape **i. Areas zoned for use as public open space or equivalent zoning;** ii. Areas outside urban areas; (aa) Areas containing indigenous vegetation; (bb) Areas on the estuary side of the development setback line or in an estuarine functional zone where no such setback line has been determined; or iii. Inside urban areas: (aa) Areas zoned for conservation use; or (bb) Areas designated for conservation use in Spatial Development Frameworks adopted by the competent authority.	**The proposed development will include new internal roads wider than 4 metres with a reserve less than 13,5 metres.** The site is currently zoned for Open Space 2: Public Open Space in the urban area of Cape Town. The proposed concept design includes provision for Class 5B (road reserve of 12 metres) and Class 5C (road reserve of 10 metres).
Activity 15	The transformation of land bigger than 1000 square metres in size, to residential, retail, commercial, industrial or institutional use, where, such land was zoned open space, conservation or had an equivalent zoning, on or after 02 August 2010. f. Western Cape i. Outside urban areas, or ii. Inside urban areas: **(aa) Areas zoned for conservation use or equivalent zoning, on or after 02 August 2010;** (bb) A protected area identified in terms of NEMPAA, excluding conservancies; or (cc) Sensitive areas as identified in an environmental management framework as contemplated in chapter 5 of the Act as adopted by the competent authority.	**The proposed activity includes the transformation of land zoned as Open Space 2: Public Open Space, for residential, retail and commercial purposes.** The City of Cape Town's Municipal Planning By-law (2015), includes the following primary use rights for OS2: • Public open space • Environmental conservation use.

Note:

- The listed activities specified above must reconcile with activities applied for in the application form. The onus is on the Applicant to ensure that all applicable listed activities are included in the application. If a specific listed activity is not included in an Environmental Authorisation, a new application for Environmental Authorisation will have to be submitted.
- Where additional listed activities have been identified, that have not been included in the application form, and amended application form must be submitted to the competent authority.

List the applicable waste management listed activities in terms of the NEM:WA

Activity No(s):	Provide the relevant **Basic Assessment Activity(ies)** as set out in **Category A**	Describe the portion of the proposed development to which the applicable listed activity relates.
No waste management listed activities in terms of NEM:WA are triggered by the proposed development. The development does not involve the storage, treatment, or disposal of waste beyond normal construction and operational waste streams, which will be managed under the EMPr.		

List the applicable listed activities in terms of the NEM:AQA

Activity No(s):	Provide the relevant **Listed Activity(ies)**	Describe the portion of the proposed development to which the applicable listed activity relates.
No atmospheric emission licence activities in terms of NEM:AQA are triggered by the proposed development. The development does not involve scheduled processes or activities requiring an atmospheric emission licence.		

SECTION E: PLANNING CONTEXT AND NEED AND DESIRABILITY

1.	Provide a description of the preferred alternative.

The preferred alternative is the proposed mixed-use development of Erf 2187 in Three Anchor Bay. This will maximise the development potential of the site which is currently developed but underutilised. The proposed concept design includes:

Civic node

- Sea Point Civic Centre and Hall.
- Existing Sea Point Public Library with a proposed extension and additional development bulk envisaged above the existing building footprint (design subject to heritage, structural, visual impact and architectural specialist input at Precinct Plan stage, consistent with the conditions set out in the Heritage Impact Assessment).
- Above ground parking bays and access to basement parking.
- New location for a crèche.

Residential and commercial components

- Residential (including affordable, middle- and high-income housing)
- Hotel space
- Retail space
- Office and other business land uses
- Internal roadways and access to basement parking

Basement parking

- Three levels

Internal roads

- Class 5B (road width = 6.4 m and road reserve = 12 m)
- Class 5C roads (road width = 5.5 m and road reserve = 10 m).

Green space

- Hard and soft landscaping internal to the site along access roads and internal pedestrian routes
- Retention and preservation of eucalyptus trees on the eastern side of the site
- Retention and preservation of the trees bordering the site along Sea Point Main Road forming part of the extended Cape Town Fan Walk

In the context of need and desirability, the preferred activity as described above meets the objectives of local and municipal planning frameworks which identify the site for civic and residentially led mixed-use development. For more details regarding the proposed massing and civil services, please refer to the project description in Section B of this report.

2.	Explain how the proposed development is in line with the existing land use rights of the property as you have indicated in the NOI and application form? Include the proof of the existing land use rights granted in Appendix E21.

The proposed site is zoned as Public Open Space (OS2) according to the City of Cape Town's Integrated Zoning Scheme (2021).

Figure 17: CCT's Integrated Zoning Scheme (2021)

3.	Explain how potential conflict with respect to existing approvals for the proposed site (as indicated in the NOI/and or application form) and the proposed development have been resolved.

No potential conflict has been identified and council's in principle approval to transfer the site was obtained in March 2026 in terms of the Municipal Asset Transfer Regulations. The release of the site will take place before the statutory process is complete. However, the transfer of the site to the successful bidder will take place after the conclusion of statutory approvals in terms of NEMA and the MPBL are concluded.

As stated in the NOI, Erf 1056/RE was subdivided in 2016 into portions (see the Rezoning and Subdivision Approval in Appendix G). The site (Erf 2187) was zoned Open Space 2: Public Open Space and identified as separate from Green Point Urban Park and the Stadium Precinct. The site will be rezoned to maximise the mixed-use development potential of the site and accommodate the proposed concept design. This includes the Civic Node being rezoned to Community Zone (CO2), the developable portion zoned to an appropriate General Business zone (GB6) and the eucalyptus trees on the eastern side of the site proposed to be zoned Open Space OS3.

4.	Explain how the proposed development will be in line with the following?
4.1	The Provincial Spatial Development Framework.

Western Cape Provincial Spatial Development Framework (2014)

The 2014 Western Cape Provincial Spatial Development Framework (PSDF) sets out to provide a shared spatial development vision for both the public and private sectors. It is a critical tool that is

used by provincial and local authorities to guide land use, infrastructure development, and spatial transformation in the region.

The spatial framework includes three interrelated themes: 1) Sustainable use of spatial assets and resources, 2) Opening-up opportunities in the Provincial space-economy, and 3) Developing integrated and sustainable settlements.

The proposed development aligns with Policy S3 and S5 of the "Developing integrated and sustainable settlements" theme:

Policy S3: Promote Compact, Mixed-Use and Integrated Settlements

The population density for the Western Cape is concentrated in urban areas, and subsequently, service delivery and infrastructure are also concentrated in these urban areas. Isolated settlements located further from city centres are declining, and service delivery to these isolated areas is hindered due to distance and cost. Mono-functional, low-density, scattered developments inhibit efficient and effective service delivery and are also deemed to have limited economic impact due to being disconnected from the existing network of infrastructure and services. Therefore, the Western Cape PSDF has identified high-density, multi-purpose developments as part of the strategy "*to minimise environmental impacts, reduce the costs and time impacts of travel and enhance provincial and municipal financial sustainability in relation to the provision and maintenance of infrastructure, facilities and services*" (2014:83).

One of the objectives of Policy S3 is to "promote functional integration and mixed use as a key component of achieving improved levels of settlement liveability and counter apartheid spatial patterns and decentralization through densification and infill development".

The proposed concept design aligns with the above as it is a high-intensity, mixed-use development that is proposed on existing underutilised land in an urban area (i.e. infill development), well-located within existing infrastructure and service networks. The proposed development also includes social services that will benefit the broader public.

Policy S5: Promote Sustainable, Integrated and Inclusive Housing in Formal and Informal Markets

The City of Cape Town and surrounding area has a major housing backlog, and exclusionary land markets prevent integration of socio-economic groups and limit affordable housing on well-located land while "the government sites on well-located under-utilised land and buildings" (page 88). Policy Section 5 of the Western Cape PSDF makes provision for sustainable, integrated and inclusive housing delivery at a Provincial scale (2014:90). This includes:

- Providing a wide choice of housing typologies and tenure options, based on economic, fiscal and social affordability.
- Targeting housing delivery projects within Integration Zones
- Ensuring that all housing delivery projects are founded on principles of sustainability and based on integrated development planning.
- Promoting more mixed-income, mixed-use, inclusionary forms of development through incorporating various scales of economic opportunities within housing projects.
- Proactively planning, aligning and coordinating the strategic use and disposal of public land to ensure that opportunities for its use for public housing are not lost.

Of the objectives associated with this policy, the housing planning and design objectives directly relate to the proposed concept design:

- Provide households with the residential environments, mobility and access to opportunities that support productive activities and reduce levels of exclusion from opportunity.
- Increase densities of settlements and dwelling units in new housing projects.
- Prioritise investment in community facilities, public infrastructure and public space, rather than exclusive focus on housing or top structures.
- Promote more mixed-income, mixed-use, inclusionary forms of development through incorporating various scales of economic opportunities within housing projects.

The proposed mixed-use development is consistent with the policies set out in the PSDF. The development framework includes residentially led mixed-use development and the upgrading of the current civic node (Colin Eglin Library and the Sea Point Civic Centre). Furthermore, the site is bounded by major arterial routes – Sea Point Main Road (M61) to the south, Helen Suzman Boulevard and Beach Road (M6) to the north, and Three Anchor Bay Road to the west – which contribute to good connectivity in east-west directions to and from the site. MyCiTi and Golden Arrow bus services are available within walking distance to the site. There are also various sport and public recreational facilities in the vicinity of the site and the City's Spatial Development Framework earmarks the site for infill development that would ensure better utilisation of this well-located land parcel close the City CBD and regional community and recreational facilities. Thus, the proposed development provides residential and employment opportunities in a well-located area, facilitating access to economic and social opportunities.

4.2	The Integrated Development Plan of the local municipality.

City of Cape Town Integrated Development Plan (2022-2027)

The City of Cape Town five-year Integrated Development Plan (IDP, 2022-2027) contains various implementation plans to be initiated within a five-year period. The IDP is the central strategy of the City of Cape Town and communicates the City's long-term vision, including how it is to be achieved. The City's five-year implementation plan is informed by 16 objectives. The objectives that the proposed mixed-use development aligns with are discussed below:

Objective 1: Increased Jobs and Investment in the Cape Town Economy

"The City is committed to increasing jobs and investment in the Cape Town economy by simplifying regulations and processes so that it is easy for businesses to start and grow." (Page 55)

The IDP states that collaboration between government and the private sector in Cape Town is essential to innovate and implement solutions that create better and more job opportunities within the city. It also recommends the support of the private sector to attract more jobs and investment to the Cape Town economy. Employment and other economic opportunities are likely to arise from the proposed development, including both temporary (construction-related) and long-term (post-construction) opportunities. The proposed concept design includes provision for retail, office and hotel space, all of which could contribute positively to jobs and investment in the local economy.

Objective 7: Increased Supply of Affordable, Well-located Homes

"The City is committed to significantly increasing access to affordable and well-located housing. It will do this by supporting a housing market that can deliver at scale to meet the needs of Cape

Town's population and prioritising the release of City-owned land for affordable housing." (Page 77)

The IDP identifies the shortage of sufficient affordable housing opportunities as a pressing issue impacting the City's overall health and progress**.** In addition, population growth in the city, and subsequent increase in households, has also impacted the delivery of affordable housing. "*Households grew from an estimated 1,07 million in 2011 to 1,46 million in 2021. The Cape Town housing market, including both private and public housing developers, has not been able to keep up with the demand for housing, leading to a growing number of informal dwellings in the City.*" (Page 22)

The IDP acknowledges that the City must take all possible measures to support the rapid construction of both formal and informal homes by the private sector, ensuring an adequate housing supply to meet the needs of Capetonians.

The proposed development aligns with the City's objective to provide access to affordable and well-located housing. The development framework includes provision for affordable housing (refer to the Socio-Economic Impact Assessment – **Appendix G3**, and Section H 1.3 of this report for more details), and is located close to the City's CBD, in close proximity to major access routes (M6), public transport, educational facilities as well as retail and commercial services. Thus, supporting the integration of residents into areas of opportunities and helps to redress historically exclusionary spatial patterns. In addition, the proposed development incorporates formalised public spaces and mixed-use components that will further enhance access to services and contribute to a more inclusive and integrated urban environment.

4.3.	The Spatial Development Framework of the local municipality.

City of Cape Town Municipal Spatial Development Framework (2023)

The City of Cape Town's approved 2023 Municipal Spatial Development Framework (MSDF) is a framework for long-term growth and development, and includes a spatial vision, policy parameters and development priorities to support Cape Town to achieve a reconfigured and inclusive spatial form and structure. The MSDF sets out the City's spatial vision and development priorities to achieve a reconfigured, inclusive spatial form for Cape Town. A key focus of the MSDF is accelerating the implementation of inward growth based on transit-oriented development (TOD). TOD implies dense mixed-use development in areas of high accessibility to public transport i.e. in development corridors; metropolitan and district nodes; and transit accessible precincts (TAPs).

The proposed mixed-use development on erf 2187, Three Anchor Bay, Green Point is located in the Urban Inner Core (UIC) and within a development corridor as defined in the CCT Municipal SDF (2023) and shown in Figure 18 below. The desired land use outcome for these areas classified as the urban inner core is for a variety of dense land uses to be implemented in conjunction with existing and future public transportation infrastructure development. The CBD is a key part of the City's Catalytic Land Development Programme, in particular, the Gateway Catalytic Precinct. In this precinct the City is exploring opportunities to unlock land with enhanced development rights as a means of leveraging greater private sector participation in development that addresses accessibility and contributes to inner-city affordable housing provision in the Cape Town CBD.

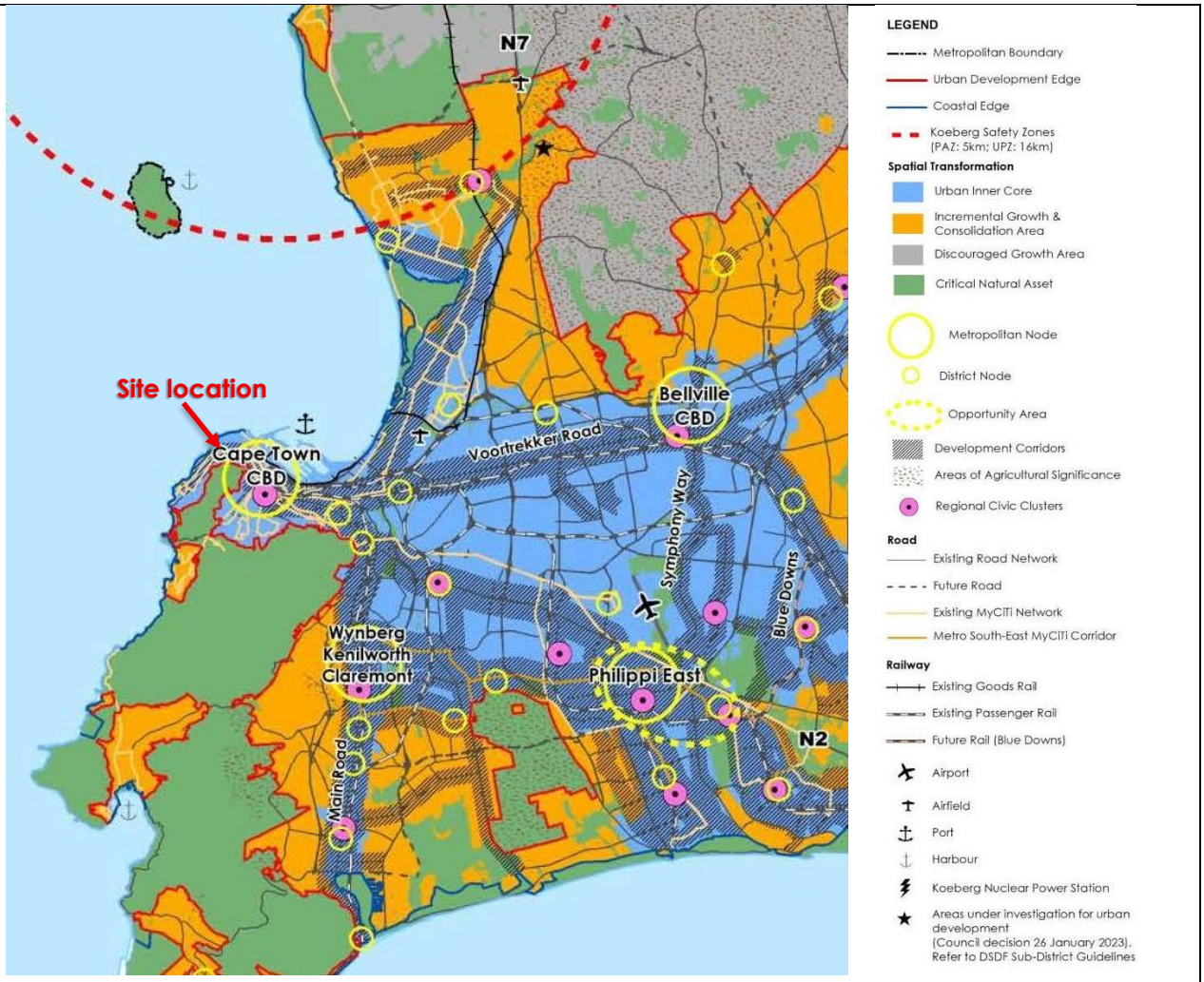


Figure 18: Consolidated spatial plan concept (Map 5d in the MSDF, page 88), with the site location indicated

The proposed development aligns with the following policy statements outlined in the Municipal SDF as part of the Municipality's spatial strategies:

Spatial Strategy 1: Plan for economic growth and improve access to economic opportunities.

- Policy 5 of this strategy states the need to promote Cape Town as a globally competitive, diversified and productive city that supports a consolidated regional economy.
- Policy 9 of this strategy states the need to plan for incremental land use intensification and diversification in support of inward growth predicated on the public transport infrastructure.

The proposed development aligns with the above in how the proposed concept design incorporates opportunities for economic growth via commercial and retail opportunities, and demonstrates an opportunity for land use intensification and diversification on an already transformed site within the Urban Inner Core and in close proximity to public transport.

Spatial Strategy 2: Manage urban growth and create a balance between urban development, food security and environmental protection.

- Policy 11 of this strategy states the need to identify, conserve and manage heritage resources and cultural landscapes
- Policy 14 states the need to provide efficient access to destination places where potential exists, especially in or near areas of high social need, in support of economic inclusivity and spatial integration

The proposed development aligns with the above in how the concept design conserves and enhances identified heritage resources on site (Sea Point Library and hall). The proposed residentially led mixed-use development provides an opportunity to offer living space in close proximity to work opportunities and destination places associated with the City's CBD and surrounds.

Spatial Strategy 3: Building an inclusive, integrated, vibrant and healthy city.

- Policy 23 states the need to support the integrated intensification and diversification of land uses in identified areas, supportive of inward spatial growth, economically and incrementally.

The development aligns with the above in how the proposed concept design would result in the intensification and diversification of land use on Erf 2187 which is currently transformed but underutilised. This can be considered as supportive of inward spatial growth.

4.4.	The Environmental Management Framework applicable to the area.

Table Bay District Plan Spatial Development Framework and Environmental Management Framework (2023)

The proposed site falls within Sub-District 1: The Atlantic Seaboard Suburbs of the Table Bay District for which a Spatial Development Framework and Environmental Management Framework were adopted by the City of Cape Town in 2023. The Integrated Spatial Development Framework and Environmental Management Frameworks (referred to as District Plans) for the City's planning districts were approved in 2023 and aligns with the 2023 MSDF. District Plans translate the MSDF vision and policy objectives in more detail.

The Table Bay District Plan (TBDP) Spatial Development Framework aims to ensure that the district is an inclusive destination that provides more homes and opportunities to people. Development in the Table Bay District should be innovative, accessible and offer a variety of economic opportunities, and benefits of which spread across the City. Moreover, it prioritises character areas, green spaces and ensuring that cultural practices are celebrated. The framework identifies that redevelopment opportunities are substantial in the district, with a large amount of underutilised existing building stock presenting opportunities for conversion. Infill developments and redevelopments will need to consider access to high quality public open spaces and public facilities. As a general principle, brownfields developments are more desirable than greenfield developments.

Mixed-use intensification is described in the TBDP (page 73), which highlights Green Point and Sea Point Main Road as an example of a business strip area where such development is encouraged: "Encourage greater land use intensification of an appropriate combination of land uses, including office and retail, business and commercial, institutional and social facilities, and high-density residential development along identified development corridors". The proposed concept design aligns with these land uses.

The TBDP indicates the following for the site (shown in Figure 19 below):

- It is recognised as Community Civic Cluster.
- A portion of the site is designated as an institutional structuring open space.
- A portion of the site is designated as a new development area with potential for high density residential development.
- The site falls within a local node.

There are no specific guidelines for community civic clusters in the TBDP, but the clusters are described as including facilities such as community parks, community centres and libraries, which could be clustered with small-scale commercial activities (TBDP, 2023: 91).

Institutional structuring open spaces are described as "green open spaces within existing institutional areas, which may not be zoned public open space but provide open space services" (TBDP, 2023, 175). These include sports fields and other open space at schools, sports clubs, hospital sites or university campuses, etc. General open space guidelines apply only to the greened areas (TBDP, 2023: 53). **In this instance it is noted that the former bowling greens have either been removed completely or have been left to deteriorate, and the TBDP states that the feasibility of high-volume, affordable residential infill development on the Green Point Bowling Green site should be investigated (TBDP, 2023, 107).** Additionally, and in alignment with open space services, the retention of the existing eucalyptus tree glade on the eastern side of the site and existing Fan Walk treed avenue along Main Road is expected to contribute positively to the pedestrian public environment, along with some recommended additional landscaping and tree planting. The general structuring open space guidelines include provision for development adjacent to open spaces, orientated towards the open space to encourage the use and passive surveillance of these areas. The proposed concept design would result in development facing the Green Point Urban Park, aligning with this guideline. Additionally, the consideration of commercial activities such as small cafes and restaurants that will enhance the use of public open space is recommended where contextually appropriate. The proposed concept design is intended to create continuity with the surrounding retail character of the area and offer such commercial opportunities.

The TBDP states that development can be guided to maximise the urban quality through urban design and considered conservation of natural assets, open spaces and heritage resources. The Table Bay District has established Environmental Management Impact Zones (EIM) and Spatial Planning Categories (SPC) bent on guiding and informing planning and decisions regarding activities that require environmental authorisation and planning approval within these areas. Environmental Management Zones and SPCs specify the inherent land use suitability of the city's environmental, cultural, and urban landscapes for development.

Figure 19: Extract from Figure 21 Subdistrict 1: Atlantic Seaboard from the 2023 TBDP (page109)

The Table Bay District Plan further identifies Three Anchor Bay as a key destination and strategic development node, recognising its potential to support for tourism, mixed-use development and increased urban growth. The proposed redevelopment is aligned with the Table Bay District Plan's objectives, as it enhances the area's appeal as a coastal destination, generates employment opportunities during both the construction and operational phases of the development, and promotes local economic opportunities. The inclusion of affordable housing further supports the TBDP's focus on advancing inclusive economic opportunities. Additionally, the integration of sustainable design principles and green infrastructure contributes to broader environmental objectives, while the provision of improved public spaces and mixed-use amenities reinforces Three Anchor Bay's role as an inclusive, vibrant, and economically active precinct.

5.	Explain how comments from the relevant authorities and/or specialist(s) with respect to biodiversity have influenced the proposed development.

The site does not support significant biodiversity, having been entirely transformed with no remnant historical vegetation and there is no terrestrial biodiversity of concern on the site. No specialist studies were therefore required.

This draft BAR is being circulated for comment for the first time, and any comments from authorities will be considered and responded to.

6.	Explain how the Western Cape Biodiversity Spatial Plan (including the guidelines in the handbook) has influenced the proposed development.

According to the Western Cape Biodiversity Spatial Plan (2023) the proposed mixed-use development on Erf 2187 does not fall within a Critical Biodiversity Area (CBA) (Figure 20). The site is entirely transformed and does not support any environmental features of concern. Note that the eucalyptus trees on the eastern side of the site, as well as trees along Main Road, are to be preserved for the aesthetic and heritage value.

Figure 20: Biodiversity Network surrounding the proposed site

7.	Explain how the proposed development is in line with the intention/purpose of the relevant zones as defined in the ICMA.

The proposed development is not subject to the ICMA. Although the site is in close proximity to the Atlantic Ocean, it is located landward of existing infrastructure within the urban edge of the City.

8.	Explain whether the screening report has changed from the one submitted together with the application form. The screening report must be attached as Appendix I.

The Screening Tool Report, generated in May 2026 is included as **Appendix I**. The report remains unchanged from the one submitted with the application form.

9.	Explain how the proposed development will optimise vacant land available within an urban area.

The proposed development will optimise the use of an underutilised state-owned land within an urban area by redeveloping it for various community, commercial, and residential uses, in an area in close proximity to public transport routes and economic nodes. It is anticipated that this could result in reduced resource dependency in that it reduces the distance between people's homes and places of work and thus reduces their dependency on motor vehicle transport. The proposed site is already transformed and impacts on ecosystems and natural resources are therefore not anticipated. Although close to the coast, the site falls within the urban edge behind existing infrastructure, and the site-related construction activities are therefore not expected to impact the coast.

Locating the proposed high-density development on a brownfields site within an urban area is an efficient use of resources relative to urban sprawl.

10.	Explain how the proposed development will optimise the use of existing resources and infrastructure.

The proposed development includes the adaptive reuse of existing buildings and the maximisation of the use of publicly owned open land close to the CBD. The site will use existing service connections and infrastructure and include upgrades where necessary. Existing infrastructure to be retained on the site includes the Sea Point Public Library, civic centre and forecourt area. The use of the library which currently experiences operational challenges, including a lack of space, is to be optimised by the proposed extension and will allow for more multipurpose activity space. The proposed upgrade of the minor hall is to include café and kitchen facilities expected to improve the capacity of the services offered by the civic centre.

The proposed site will make use of the existing transport nodes since it is adjacent to the MyCiTi Atlantic Corridor which provides reliable transporting services linking Camps Bay, Clifton, Sea Point, Green Point and the CBD. It is also close to public transport routes including Green Point Main Road and Golden Arrow routes. The site is located near economic nodes in the central business district of Cape Town. It is intended to result in commercial, retail and residential opportunities including affordable housing in close proximity to employment.

11.	Explain whether the necessary services are available and whether the local authority has confirmed sufficient, spare, unallocated service capacity. (Confirmation of all services must be included in Appendix E16).

The proposed Three Anchor Bay development site falls within an infrastructure priority area and is strategically positioned with respect to civil engineering infrastructure, benefiting from surrounding road, stormwater, sewer, electrical, and water connection opportunities.

Based on the formal capacity letter issued by the City of Cape Town (dated 8 June 2026), the proposed development is confirmed to be feasible from a water and sewer services perspective. The assessment confirms that:

- The water supply system has sufficient capacity in terms of resource availability, treatment, storage and conveyance to accommodate the estimated potable water demand of approximately 1045kl/day.
- The water reticulation network has adequate pressure and flow capacity to supply the development without requiring bulk upgrades.
- The wastewater treatment system (Green Point outfall) has sufficient spare capacity to accommodate the estimated sewer flows of approximately 950 kℓ/day ADWF.
- The 900 mm diameter bulk sewer system has sufficient capacity to convey the development flows.

Localized upgrades are required in the existing 150mm diameter sewer reticulation pipeline however no bulk infrastructure upgrades are required. The development is considered feasible subject to compliance with the City's conditions as per the City's capacity letter (included in **Appendix L2**).

The electrical report (**Appendix L4**) indicates that the development can be supplied from the existing network, subject to the implementation of new infrastructure. Key electrical infrastructure requirements include:

- A new substation to accommodate the development load,
- New 3-feeder-group of underground cables from Mouille Point 132/11kV substation,
- Relocation and/or protection of existing buried services including medium and high voltage cables and dedicated feeds to the SABC studios,

• Internal medium- and low- voltage reticulation systems.	
12.	In addition to the above, explain the need and desirability of the proposed activity or development in terms of this Department's guideline on Need and Desirability (March 2013) or the DEA's Integrated Environmental Management Guideline on Need and Desirability. This may be attached to this BAR as Appendix K.
Please see attached **Appendix K** for a detailed response to the Need and Desirability considerations in terms of this guideline.	

SECTION F: PUBLIC PARTICIPATION

The Public Participation Process ("PPP") must fulfil the requirements as outlined in the NEMA EIA Regulations and must be attached as Appendix F. Please note that If the NEM: WA and/or the NEM: AQA is applicable to the proposed development, an advertisement must be placed in at least two newspapers.

1. Exclusively for linear activities: Indicate what PPP was agreed to by the competent authority. Include proof of this agreement in Appendix E22.

Not applicable as the activity is not a linear activity.

2. Confirm that the PPP as indicated in the application form has been complied with. All the PPP must be included in Appendix F.

Pre-statutory public participation (April – December 2025)

An inclusive stakeholder engagement process has formed part of the concept development, intended to provide for meaningful participation by local and affected participants and contribute to a more robust and accepted design for the site.

The pre-statutory public participation process started in April 2025 with a pre-registration process and Information Sharing Phase including public engagement events (open house and online meeting) to share information about the project site. A database of registered Interested and Affected Parties was started and updated throughout the engagement process. An Online Public Meeting was hosted on 7 May 2025 and an In-person Open House on 14 May 2025. The inputs received during this process were taken into consideration in development of the draft concept design.

The pre-statutory public participation process on the draft concept design included a 30-day registration and commenting period that started on **Thursday 06 November 2025** and closed on **Monday 08 December 2025**. Its focus was publicising and presenting the draft development concept for a mixed-use development on erf 2187, Three Anchor Bay, Green Point (initially developed with a core group of identified key stakeholders) with the broader public. All input has been reviewed and considered.

Potential Interested and Affected Parties (I&APs)

The EIA Regulations (2014, as amended) define potential interested and affected parties as including:

(i) the occupiers of the site and the owner or person in control of the site;
(ii) owners, persons in control of, and occupiers of land adjacent to the site;

(iii) the municipal councillor of the ward in which the site is situated and any organisation of ratepayers that represents the community in the area;
(iv) the municipality which has jurisdiction in the area;
(v) any organ of state having jurisdiction in respect of any aspect of the activity; and
(vi) any other party as required by the competent authority

Methods used to notify potential I&APs

- A media notice was published in the local free newspaper, the *Atlantic Sun*, on 17 April 2025.
- A project website has been maintained through the project process, hosted at www.infinity.capetown/3anchorbay, providing information on the draft concept and project proposals, information on the conceptual design process, including all meeting notes and presentations, and a comment and registration form for submission of inputs.
- A public online meeting was held on 7 May 2025, which started at 18:00 and finished at 20:20. This meeting was the first round of the public engagement sessions for the proposed mixed-use development.
- Additionally, two public open houses were hosted on 14 May 2025 and 12 November 2025, respectively, at BSG Environmental Education Centre, Green Point.
- Comments were captured via the project website, by email or telephone.
- The database of registered interested and affected parties has been updated as the project progressed.

See **Appendix F** for the Pre-statutory Public Participation Report.

Statutory Public Participation (Current Stage: 18 June 2026 to 20 July 2026)

The EIA regulations define potential interested and affected parties as including –

i. the occupiers of the site and the owner or person in control of the site
ii. owners, persons in control of, and occupiers of land adjacent to the site
iii. the municipal councillor of the ward in which the site is situated and any organisation of ratepayers that represents the community in the area;
iv. the municipality which has jurisdiction in the area;
v. any organ of state having jurisdiction in respect of any aspect of the activity; and
vi. any other party as required by the competent authority;

Interested and affected parties will be notified of the commenting period for the draft BAR with various methods from 18 June to 20 July 2026 will be used including the following:

a. Notification of registered I&AP's

A database of registered interested and affected parties (I&APs) has been created. Potential I&APs are invited to register their interest in this application, should they wish to receive further notifications.

b. Notification of adjacent landowners and occupiers

Adjacent landowners and occupiers of the site will be notified by hand delivery and/or post of the public participation process.

c. Notification of municipal councillors and community organisations

The site is in Sub-council 16, Ward 54 and 115 of the City of Cape Town Municipality. Identified community-based organisations will also be notified via email.

d. Organs of state having jurisdiction in respect of any aspect of the activity

As part of the Environmental Impact Assessment Public Participation Process, Organs of State which administer related legislation are provided with an opportunity to comment on the Basic Assessment Report. Each organ of state will be notified of the availability of the draft BAR for comment via email, which includes a link containing the report and associated appendices. The organs of state to be consulted are listed in item 3 below.

e. Media notices

A media notice will be published in the local free newspaper, the *Atlantic Sun* on 18 June 2026 notifying the general public of the application and a 30-day commenting period.

f. Site notices

Site notices will be placed on the property by the EAP, complying with regulatory requirements.

g. Report availability

The draft Basic Assessment Report and associated appendices will be made available on the project website at www.infinity.capetown/3anchorbay.

A copy of the report will be available for public viewing at the Colin Eglin Library from Thursday, 18 June 2026 to Monday, 20 July 2026.

h. Open House

An Open House will be held on Wednesday, 24 June 2026 at the Biodiversity Showcase Garden Environmental Education Centre, 101 Bay Rd, Green Point. The event will start at 3:00 and end at 7:00pm, during which posters will be on display. The professional team will be available to answer questions and concerns the public may have about the proposed development.

3. Confirm which of the State Departments and Organs of State indicated in the Notice of Intent/application form were consulted with.

The following State Departments and Organs of State will be consulted:

- Department of Environmental Affairs and Development Planning (DEA&DP):
  - Development Management,
  - Pollution & Chemicals Management,
  - Waste Management, and
  - Coastal Management
- Department of Forestry, Fisheries and the Environment:
  - Oceans and Coasts
- Department of Water and Sanitation
- Department of Social Development
- City of Cape Town: Environmental & Heritage Management (will be responsible for the distribution of all notifications to all other internal City Directorates, including Spatial Planning, Water and Sanitation, Coastal Management and Urban Mobility).
- Heritage Western Cape
- SANParks: Marine Protected Areas

4. If any of the State Departments and Organs of State were not consulted, indicate which and why.

All relevant State Departments and Organs of State will be consulted.

5. If any of the State Departments and Organs of State did not respond, indicate which.

To be confirmed on completion of the public participation process.

6. Provide a summary of the issues raised by I&APs and an indication of the manner in which the issues were incorporated into the development proposal.

Summary of issues raised by I&APs during the pre-statutory commenting period that occurred in November to December 2025 on the draft Concept Design:

The key themes and issues raised by I&APs during the pre-statutory (voluntary) public engagement process, and the manner in which these were considered and incorporated into the development proposal, are summarised below.

Traffic and Parking

Traffic congestion and parking were frequently raised concerns, with I&APs citing gridlocked roads across Sea Point, Green Point, and the Atlantic Seaboard, and in general the congested nature of the City of Cape Town. Comments received indicated concern regarding the addition on hundreds of residential units and commercial space to an already strained road network, including the Glengariff/Main Road intersection. Responses cited the Transport Impact Assessment (TIA, Appendix G4 of the draft BAR), which assessed future traffic conditions and identified mitigation measures, and noted that the development falls within a PT2 Public Transport zone where there is no minimum parking requirement. However, a three-level super-basement providing approximately 1,975 bays is nonetheless included in the concept design.

Heritage and the Library/Civic Centre/ECD

A strong theme emerged around the retention and protection of heritage buildings on the site, particularly the Colin Eglin Library and Sea Point Civic Centre. Many I&APs expressed anxiety that these buildings (which serve as community anchors for schools, retirement facilities, events, and daily library use) would be demolished or diminished. Docomomo South Africa made a formal submission objecting to the proposed subdivision of the library space and the placement of new buildings in the civic forecourt. Responses confirmed that the library and civic centre will be retained as cultural and architectural anchors, sensitively upgraded by a heritage-qualified architect, and that the forecourt will be enhanced as active public space. The concept design also makes provision for a new, purpose-built Early Childhood Development (ECD) facility within the civic node, recognising the important role of ECD services on the site. However, no decisions have yet been made regarding the future operator or occupancy arrangements for this facility, which will be determined at a later stage by the future developer and relevant stakeholders.

Heritage Status of the Land (Green Point Common)

Comments were received that challenged the legal and moral basis for developing Erf 2187, asserting that it was vested in perpetuity as public recreational land as part of the Green Point Common, and that the Provincial Heritage Site designation of the Common should protect it.

Responses addressed this at length, clarifying that Erf 2187 was subdivided from the original Erf 1056 in 2016, that the 1923 Deed of Grant contains no conditions restricting the land to recreational use (confirmed by a conveyancer), and that Erf 2187 does not form part of the proclaimed Provincial Heritage Site. The Conservation Management Plan's reference to perpetual recreational use was noted as not being supported by the actual deed.

Density, Building Heights, and Visual Impact

Concerns were received regarding the scale and massing of the proposed development, particularly the maximum heights of 45m along Helen Suzman Boulevard and 30m elsewhere, which they argued would block sea and mountain views, overshadow neighbouring properties, and be out of character with the surrounding low-to-medium density residential fabric. Responses cited the Visual Impact Assessment (Appendix G2) which concluded that the graduated massing approach, positioned taller elements at the Helen Suzman Boulevard edge, and retained view corridors would not result in unacceptable visual impacts. The assessment noted that the buildings would read against the Signal Hill backdrop rather than dominating the skyline, and that a maximum permitted height plan would be a condition of rezoning. Shading and shadow concerns were addressed through a number of urban design principles embedded in the concept design, including setting taller tower elements back from the street edge, distributing buildings across the site to allow light penetration, and orientating buildings on a north–south axis to reduce prolonged shadow impacts.

Affordable Housing and Spatial Justice

Comments on affordable housing ranged from strong support for increasing housing access in an expensive area, to scepticism about whether the units would genuinely benefit those most in need. Some I&APs questioned the definition of "affordable" and stated that housing priced at up to R11,500/month or a studio at R1.5 million is inaccessible to low-income Capetonians. One I&AP raised issues of spatial redress and called for quantifiable targets for historically disadvantaged individuals. Responses confirmed that a minimum of 20% of residential units will be market-led affordable housing (targeting households earning up to R34,400/month) but acknowledged that this does not resolve systemic spatial inequality or meet the needs of the lowest-income groups. The approach focuses on broader socio-economic inclusion.

Environmental Concerns (Sewage, Water, and Marine Environment)

Several I&APs raised concerns about the discharge of sewage into the ocean through the Green Point Marine Outfall, and whether the development would add to already strained water and wastewater infrastructure. Some called for a package sewage treatment plant to be built on the site. Responses noted that the development would discharge to the Green Point Wastewater Treatment Plant (not directly to the marine outfall), which has confirmed sufficient capacity, and that the Civil Services Report (Appendix L2) confirms adequate water and sewer network capacity. Recommendations for rainwater harvesting and low-flow fixtures are included in the Stormwater Management Plan (Appendix L3), addressing water scarcity concerns.

Public Space and Loss of Open Space

A recurring concern was that the development would eliminate valuable open and green space that residents and locals currently enjoy. Several I&APs called for the site to be preserved as a park or community green space rather than handed over to developers. Responses noted that the existing sports facilities on the site are privately operated and not publicly accessible,

and that the concept design incorporates a pedestrian network, green corridors, and an activated public realm connecting to the adjacent promenade and Green Point Urban Park. The site itself is described as already transformed and deteriorated (bowling greens tarred over or dried out).

Sky Train / Public Transport Infrastructure

Some of the comments received focused not on the mixed-use development itself but on a privately proposed Cape Town Sky Train, calling for a train terminus to be incorporated into the Three Anchor Bay site as part of the development. It was argued this was an opportunity to provide the Atlantic Seaboard with mass rapid transit and ease chronic traffic congestion. Responses were consistent: the City of Cape Town does not support the Sky Train proposal, has no plans to extend rail to the Atlantic Seaboard, and the concept has not been adopted by any competent authority, has no approved funding, and falls outside the scope of a site-level Basic Assessment EIA process. The development of this site does not preclude future transport improvements being considered through appropriate processes.

Concept Design, Investor Flexibility, and Town Planning

Several professional and investor I&APs questioned whether the prescribed concept design left sufficient flexibility for future developers to exercise design and market discretion, cautioning that an overly prescriptive approach would deter serious investment. Conversely, others questioned specific zoning choices, particularly the use of General Business rather than residential zoning. Responses clarified that the concept design establishes a maximum development envelope and principles rather than a final design, and that while certain mandatory requirements (heights, setbacks, urban structure) will be fixed, the future developer will retain significant design autonomy within those parameters.

Note:

A register of all the I&AP's notified, including the Organs of State, and all the registered I&APs must be included in Appendix F. The register must be maintained and made available to any person requesting access to the register in writing.

The EAP must notify I&AP's that all information submitted by I&AP's becomes public information.

Your attention is drawn to Regulation 40 (3) of the NEMA EIA Regulations which states that *"Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but **must** be provided with an opportunity to comment on such reports once an application has been submitted to the competent authority."*

All the comments received from I&APs on the pre -application BAR (if applicable and the draft BAR must be recorded, responded to and included in the Comments and Responses Report and must be included in Appendix F.

All information obtained during the PPP (the minutes of any meetings held by the EAP with I&APs and other role players wherein the views of the participants are recorded) and must be included in Appendix F.

Please note that proof of the PPP conducted must be included in Appendix F. In terms of the required "proof" the following is required:

- a site map showing where the site notice was displayed, dated photographs showing the notice displayed on site and a copy of the text displayed on the notice;
- in terms of the written notices given, a copy of the written notice sent, as well as:
  - if registered mail was sent, a list of the registered mail sent (showing the registered mail number, the name of the person the mail was sent to, the address of the person and the date the registered mail was sent);
  - if normal mail was sent, a list of the mail sent (showing the name of the person the mail was sent to, the address of the person, the date the mail was sent, and the signature of the post office worker or the post office stamp indicating that the letter was sent);
  - if a facsimile was sent, a copy of the facsimile Report;

- if an electronic mail was sent, a copy of the electronic mail sent; and
- if a "mail drop" was done, a signed register of "mail drops" received (showing the name of the person the notice was handed to, the address of the person, the date, and the signature of the person); and

- a copy of the newspaper advertisement ("newspaper clipping") that was placed, indicating the name of the newspaper and date of publication (of such quality that the wording in the advertisement is legible).

SECTION G: DESCRIPTION OF THE RECEIVING ENVIRONMENT

All specialist studies must be attached as Appendix G.

1. Groundwater

1.1.	Was a specialist study conducted?	YES	**NO**
1.2.	Provide the name and or company who conducted the specialist study.		
Not required at this stage but may be triggered at detailed design depending on basement extent/dewatering requirements.			
1.3.	Indicate above which aquifer your proposed development will be located and explain how this has influenced your proposed development.		
The proposed project site is underlain by a major fractured aquifer according to spatial data available via Cape Farm Mapper, version 3 (2024). A fractured aquifer is characterised by groundwater stored in the fractures, joints, bedding planes and cavities of the rock mass. Major aquifer regions are high-yielding systems of good water quality.			
1.4.	Indicate the depth of groundwater and explain how the depth of groundwater and type of aquifer (if present) has influenced your proposed development.		
The depth to groundwater is mapped to be 7.55 mbgl according to CapeFarmMapper3. Control of groundwater ingress into the basement excavations during construction may be necessary and precautions against chemical attack and/or corrosion are provisionally recommended. The proposed concept design is intended as a framework from which the final development is to be determined. Depending on the final development design and extent of basement parking included, a hydrogeological specialist may be required and relevant water use application undertaken (dewatering activities between 50 to 100 cubic metres a day requires a General Authorisation for the water use, and anything exceeding 100 cubic metres a day requires a Water Use Licence Application in terms of GN 665 of 2013).			

2. Surface water

2.1.	Was a specialist study conducted?	YES	**NO**
2.2.	Provide the name and/or company who conducted the specialist study.		
Not applicable as no freshwater study was required. The proposed development does not pose a risk to watercourses or wetlands.			
2.3.	Explain how the presence of watercourse(s) and/or wetlands on the property(ies) has influenced your proposed development.		

Not applicable since no watercourses or wetlands occur on the site.

3. Coastal Environment

3.1.	Was a specialist study conducted?	YES	**NO**
3.2.	Provide the name and/or company who conducted the specialist study.		
Not applicable.			
3.3.	Explain how the relevant considerations of Section 63 of the ICMA were taken into account and explain how this influenced your proposed development.		
Not applicable. Although the proposed site is located within 100 m of the coast, it falls behind the coastal urban edge, therefore not considered part of the coastal protection zone. The stormwater management plan has considered the proximity to the coast and recommended a water quality treatment approach to ensure the quality of stormwater from the site meets the required targets (refer to **Appendix L3** for more details).			
3.4.	Explain how estuary management plans (if applicable) has influenced the proposed development.		
Not applicable.			
3.5.	Explain how the modelled coastal risk zones, the coastal protection zone, littoral active zone and estuarine functional zones, have influenced the proposed development.		
The site is located within 100m of the high-water mark of the sea and the adjacent Sea Point Promenade can be considered a major coastal anthropogenic structure. According to the National Environmental Management: Integrated Coastal Management Act 24 of 2023 (NEM: ICMA), coastal protection zones include areas situated wholly or partly within 100 m of the high-water mark. The proposed concept design does not contradict the purpose of the coastal protection zone as described in Section 17 of the NEM:I CMA due to the site being already transformed, within an urban area and located landward of the promenade which provides coastal protection against wave action and associated erosion. Due to the close proximity to the coast, the stormwater management plan prioritises a treatment-focused approach to ensure stormwater quality meets the required targets before feeding into the surrounding stormwater network and discharging into the ocean (refer to **Appendix L3** for more details). The EMPr (**Appendix H**) includes construction-related mitigation measures to reduce and minimise risks to the surrounding environment which are expected to adequately mitigate potential negative impacts on the surrounding urban and coastal environment.			

4. Biodiversity

4.1.	Were specialist studies conducted?	YES	**NO**
4.2.	Provide the name and/or company who conducted the specialist studies.		
Not applicable.			
4.3.	Explain which systematic conservation planning and other biodiversity informants such as vegetation maps, NFEPA, NSBA etc. have been used and how has this influenced your proposed development.		

The City of Cape Town Biodiversity Network, Critical Biodiversity Areas (CBA), Ecological Support Areas (ESA) and Protected Areas, which forms part of the Western Cape Biodiversity Spatial Plan (WCBSP) of 2023 was consulted. According to the WCBSP, the site does not fall part of a CBA, ESA or protected area.

The surrounding area's biodiversity network, as shown in Figure 20, designates the slopes below the proposed development site as CBA likely due to the presence of critically endangered vegetation and proximity to the Signal Hill mountain range. A review of site conditions (refer to the **Site Sensitivity Verification Report** – **Appendix M**) indicates that the site is entirely transformed, with limited grass and alien tree species. The DFFE Screening Tool indicates the site was historically Peninsula Shale Renosterveld, but site is now entirely transformed, considered a brownfield site and therefore ideal for redevelopment.

4.4.	Explain how the objectives and management guidelines of the Biodiversity Spatial Plan have been used and how has this influenced your proposed development.

According to the DFFE Screening Tool, the site is mapped as having a very high terrestrial biodiversity sensitivity due to the presence of the Peninsula Shale Renosterveld (PSR), now critically endangered. However, the site is transformed with no remnant historical vegetation and there is therefore no terrestrial biodiversity of concern on the site. There are also no indigenous vegetation remains left on the site and it is not representative of a threatened ecosystem.

Due to the current state of the proposed development area, there are no botanical sensitivities present on the site that need to be protected or conserved. Note that the eucalyptus trees on the eastern side of the site, as well as trees along Main Road, are to be preserved for the aesthetic and heritage value.

4.5.	Explain what impact the proposed development will have on the site specific features and/or function of the Biodiversity Spatial Plan category and how has this influenced the proposed development.

As discussed above, there are currently no botanical sensitivities on the proposed site.

4.6.	If your proposed development is located in a protected area, explain how the proposed development is in line with the protected area management plan.

The proposed development site is not in a protected area.

4.7.	Explain how the presence of fauna on and adjacent to the proposed development has influenced your proposed development.

Not applicable.

5. Geographical Aspects

Explain whether any geographical aspects will be affected and how has this influenced the proposed activity or development.

The proposed development will occur within an urban area and will not materially alter geographical aspects.

The site geology comprises a covering of fill materials, topsoil, transported soils and/or residual clay of various thicknesses and extents overlying phyllite rock of the Malmesbury Group. The phyllite rock transitions from a moderately weathered, highly jointed, hard to very hard rock into a slightly weathered to unweathered, moderately to slightly jointed, very hard rock with depth.

6. Heritage Resources

6.1.	Was a specialist study conducted?	**YES**	NO
6.2.	Provide the name and/or company who conducted the specialist study.		
A heritage impact assessment was conducted by Professional Heritage Practitioner Lize Malan, in collaboration with Cindy Postlethwayt. Refer to **Appendix G1** for the HIA.			
6.3.	Explain how areas that contain sensitive heritage resources have influenced the proposed development.		

This section draws heavily on the heritage study (Malan & Postlethwayt, 2026) conducted and should be understood as excerpting or summarising this report (Appendix G1) unless otherwise referenced.

The heritage resources identified on the proposed site are illustrated and numbered in Figure 21 below. Sensitive heritage resources located on and in proximity to Erf 2187, Three Anchor Bay, particularly the Colin Eglin Library, the Sea Point Civic Centre and the eucalyptus avenue on the eastern end of the site – have played a significant role in informing the conceptualisation and refinement of the proposed development.

Figure 21: Location of on-site heritage resources

1. The Colin Eglin Library and Sea Point Civic Centre with forecourt
2. The original bowls clubhouse
3. The historic substation building
4. The later bowls clubhouse building – now housing the Western Cape Bridge Club
5. The newest of the bowls clubhouse buildings – now housing the Pinocchio Crèche
6. The remnant of the eucalyptus avenue that lined Main Road and the southern boundary of the Green Point Common

The Colin Eglin Library and Sea Point Civic Centre and forecourt: the building that houses the library and civic centre in the southwestern corner of the site, is not older than 60 years (which would indicate a potential heritage resource according to the National Heritage Resources Act 25 of 1999), but it is nevertheless considered a heritage resource owing to its design and use. The building dating to 1971 was designed by Graham Ramsay and is regarded as a significant modernist building with the brise soleil noted as a defining element of the design. Furthermore, the quality of the library's main hall, foyer of the civic centre, quality of the construction of the buildings, as well as the architectural detail like the panelling, sprung flooring and the custom brise soleil, is exceptional.

The remainder of the eucalyptus tree avenue (at the eastern end of the site): the open area lined on either side with eucalyptus trees to the east of the site is noted as a heritage resource, as these trees formed part of a very long double tree belt planted on the northern side of the Somerset/Main Road from Ebenezer Road in the east to Three Anchor Bay Road in the west. Although the exact purpose of the tree avenue is not understood at this stage, it is evident that the age and intentional planting (likely related to the use of the Common for horse racing) is a significant remnant of the late 18th/19th century pattern of development in this part of the city.

Given the heritage significance and social value attributed to these resources, their retention has been treated as a fundamental design informant.

The development proposal has therefore been structured around the preservation and continued use of these buildings, with no demolition proposed, as well as the retention and management of

the eucalyptus trees. This approach ensures the safeguarding of both tangible heritage fabric and intangible community associations linked to the site.

In response to the heritage context, the following key design interventions have been incorporated:

- **Retention and adaptive integration:** the existing library, civic centre and eucalyptus trees are fully retained and incorporated into the development design, forming an integral component of the overall site layout and public interface.
- **Height and massing:** building height and bulk have been stepped and articulated to avoid overwhelming the heritage resources, maintaining a transitional scale between the existing structures and new built form.
- **Protection of visual corridors:** key visual corridors identified (including those aligned with surrounding streets such as St Bede's Road, Hill Road, Clyde Road and Wigtown Road) have been retained to preserve visual permeability.
- **Context-sensitive architectural response:** The architectural language of the proposed development incorporates articulated façades, active street edges, and a fine-grained urban form that responds to the established character of Three Anchor Bay, rather than introducing monolithic or visually intrusive elements.
- **Construction-phase safeguards:** Measures such as heritage specialist oversight, careful construction management, and maintenance interventions (including addressing existing issues like rainwater drainage) will be implemented to ensure that the integrity of the heritage resources is protected during the construction phase.

Overall, the presence of sensitive heritage resources has directly informed a development approach that prioritises conservation, contextual integration, and enhancement of the site's cultural significance, while still enabling appropriate urban intensification. It is recommended that any upgrades or alterations made to the library and civic centre should be informed by a heritage architect with suitable experience in modernist buildings.

7. Historical and Cultural Aspects

Explain whether there are any culturally or historically significant elements as defined in Section 2 of the NHRA that will be affected and how has this influenced the proposed development.

Section 2(xvi) of the NHRA defines a heritage resource as "*any place or object of cultural significance*." In terms of the Act, cultural significance refers to aesthetic, architectural, historical, scientific, social, spiritual, linguistic, or technological value or importance. The following heritage significances have been identified and classified for the proposed site:

Architectural significance:

The Colin Eglin Library and Sea Point Civic Centre: IIIA
This accomplished modernist building is a landmark in the area. The quality of the spaces (such as the library's main hall and the foyer of the civic centre), the architectural detail (such as the panelling, sprung flooring and the custom brise soleil) and the quality of construction of the building is exceptional. The forecourt of this complex was clearly integral to the design of the building, and although currently affected by a lack of maintenance and security measures, is vital to setting and appreciation of the building itself. It has the potential to become a pleasant public place.

The electrical substation: IIIB
This building is a rare example of industrial architecture of its era, with detailing that elevates the building from merely a shed to an attractive building, thus warranting the IIIB grading. Despite this, the structure does not warrant retention. A new electrical substation is proposed as part of the development, and this building is proposed to be demolished

The three clubhouse buildings and numerous outbuildings on the site: No Conservation Worthy
None of these buildings are exceptional in any way, and although some could be regarded as typical of their era, they are not rare examples of 20th century architecture. They are functional and all implement standard design features of their time, such as hipped roofs with deep eaves and a face brick plinth. The original club house may have been of some architectural interest, if it was not so extensively altered over the years. Although some of the outbuildings are more considered, none of them are of sufficient merit to warrant their retention.

Aesthetic significance:

Following on the above and given the recent deterioration of the bowling greens and the non-descript nature of the structures historically associated with bowling on the site, a large portion of the site is in fact quite unattractive at present, when viewed from Main Road, but also Helen Suzman Boulevard. It is evident that only the library and civic centre complex, and the eucalyptus trees on either end of the site, has some aesthetic significance.

Socio-historic significance:

It is acknowledged that the site has some historic significance as having formed part of the larger Green Point Common that was used by various sporting codes since the 19th century. Lawn bowls was accommodated on this site since 1906, and was clearly popular during the mid-20th century, but this was an entertainment activity for a particular sector of Cape Town society. The reality is that interest in the sport has declined to the extent that bowling on the site has ceased in the 2010s.

Thus, it is concluded that the bowling site is of limited social significance (also given that there are bowling clubs in the area, such as Fresnaye, that are still running). The significance of the unbroken history of the use of the site for bowling of approximately 110 years is rather attributed to the site remaining relatively undeveloped for this time and thus contributing to the larger visual and cultural landscape of this part of the Cape Town.

The remaining rows of eucalyptus trees at the eastern end of the site, as a remnant of the very early development and use of the larger Green Point Common is regarded as having some historic significance. The library (in particular) and the civic centre, although not historic clearly plays an important role in local community, by virtue of its location, form and public service and could be regarded as having some social significance, although this may not be considered to be of socio-historic significance (i.e. as a community use, it should be considered to be of significance to the project, but not necessarily to the heritage assessment, except in so far as it is regarded to be of architectural significance). Similarly, the Pinocchio Crèche, the use of which is of social significance, but not necessarily socio-historic significance.

Overall, the socio-historic significance of the site is assessed as follows:

- Bowling greens and facilities – low socio-historic significance
- Library and civic centre – medium to high social significance
- Eucalyptus tree lines – medium socio-historic significance

Contextual significance:

The site has contextual significance related to the following:

- The landmark quality of the library and civic centre in its local and regional context.
- The longstanding relatively open unbuilt quality of the bowling greens portion of the site and its location between the dense urban development along Main Road and the Green Point Common, with its relatively low-key development (except of course for the stadiums) accommodating recreational activities. Although not all of these facilities are open to the general public, the Common can be regarded as a key public space in Cape Town.
- The remaining eucalyptus trees also have contextual significance as contributing to the green character of the Common.

In summary, the site is regarded to have a medium-to-high contextual significance.

The site has no known scientific or linguistic significance, and there is no evidence that the site is linked to the history of slavery. As noted, portions of the site like the library, civic centre and eucalyptus tree lines, are regarded as of sufficient architectural, aesthetic and socio-historic significance to warrant a grading, but the bulk of the site has limited intrinsic heritage value. Overall, the site has relatively high contextual significance, but this significance also varies across the site.

Summary of Heritage Significance		
Resource	**Grading/Proposed grading**	**Nature of significance**
Colin Eglin Library and Sea Point Civic Centre	IIIA	Architectural and social
Remains of historic eucalyptus tree avenue	IIIB	Historical
Electrical substation main building	IIIB	Architectural
Clubhouse and outbuildings	NCW	Not applicable
Contribution to context	IIIB	Green space, views over site, interface with Main Road

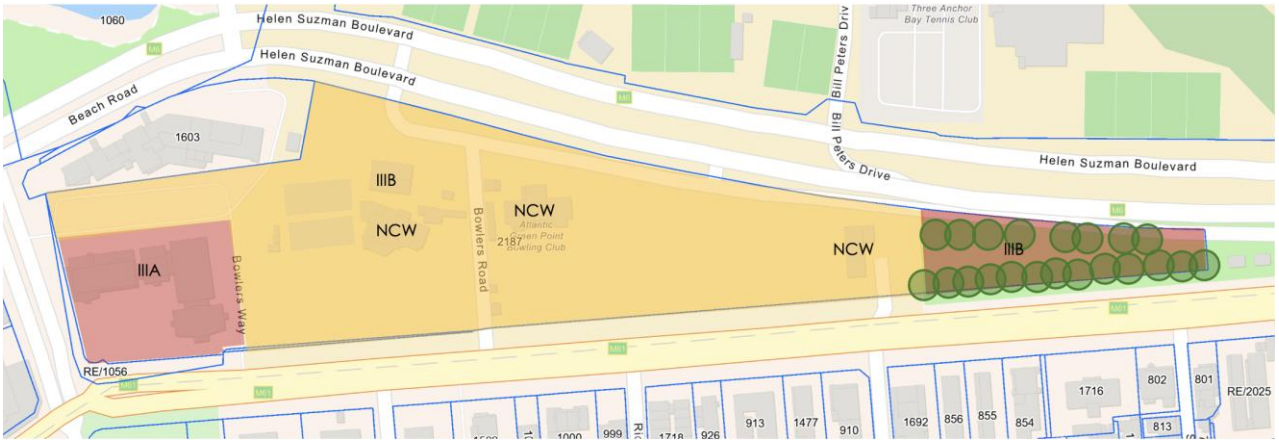


Figure 22: Heritage resources on the site (extracted from the HIA)

8. Socio/Economic Aspects

8.1.	Describe the existing social and economic characteristics of the community in the vicinity of the proposed site.

Socio-economic Impact Assessment (Appendix G3)

Baseline profile of the site

Social demographics

Populations and households:

The table below indicates the population and households of the primary study area (PSA), which consists of Three Anchor Bay, Green Point, Sea Point and Mouille Point, and secondary study area (SSA) which consists of the Table Bay District.

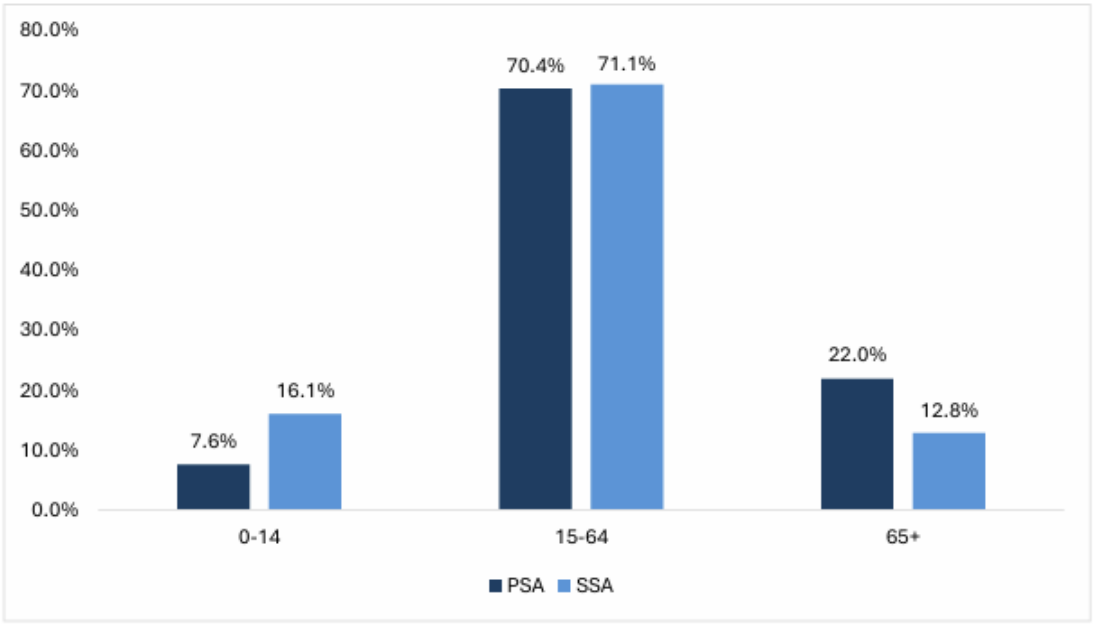
	PSA	SSA
Population	27 145	306 385
Households	13 490	100 776
Average household size	2,01	3,04
Average annual household growth rate	1%	1%

(Urban-Econ via Quantec EasyData, 2026)

The smaller average household size in the PSA potentially implies a lower dependency ratio meaning that adults have fewer children or elderly persons relying on them as breadwinners and/or caretakers. The small average household size also indicates a young working-age population. The 1% average annual household growth rate indicates a modest growth rate in both population and households. The PSA has a high concentration of short-term rentals typically rented by tourists and digital nomads, although there is little data available to indicate how many people this accounts for. Nonetheless, it can be assumed that this adds to the area's population especially during the summer peak season.

Age distribution:

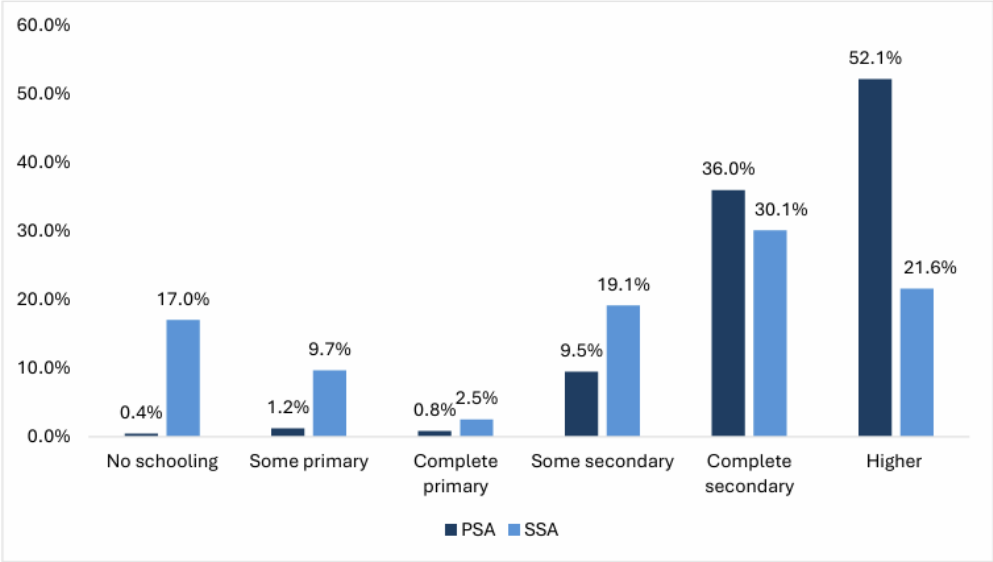
The age distribution for the PSA is relatively similar to the broader Table Bay District. There is a higher proportion of individuals between the ages of 15 and 64 compared to the proportion of children. This indicates a larger labour force, and thus likely a higher demand for employment. The PSA has a notably higher proportion of pensioners (age 65+), which is likely due to the prevalence of retirement communities in and around the area.



(Urban-Econ via Quantec EasyData, 2026)

Education:

The PSA has notably higher average schooling levels than the surrounding district. The majority of adults within the PSA have completed higher education, followed by those with completed secondary education, indicating a highly skilled labour force. Additionally, the proportion of individuals with no schooling in the PSA is minimal, suggesting strong access to and provision of educational facilities. In contrast, the broader SSA has a notably higher proportion of individuals with no schooling, suggesting significant lower levels of educational attainment, and by implication lower average household income, compared to the PSA.

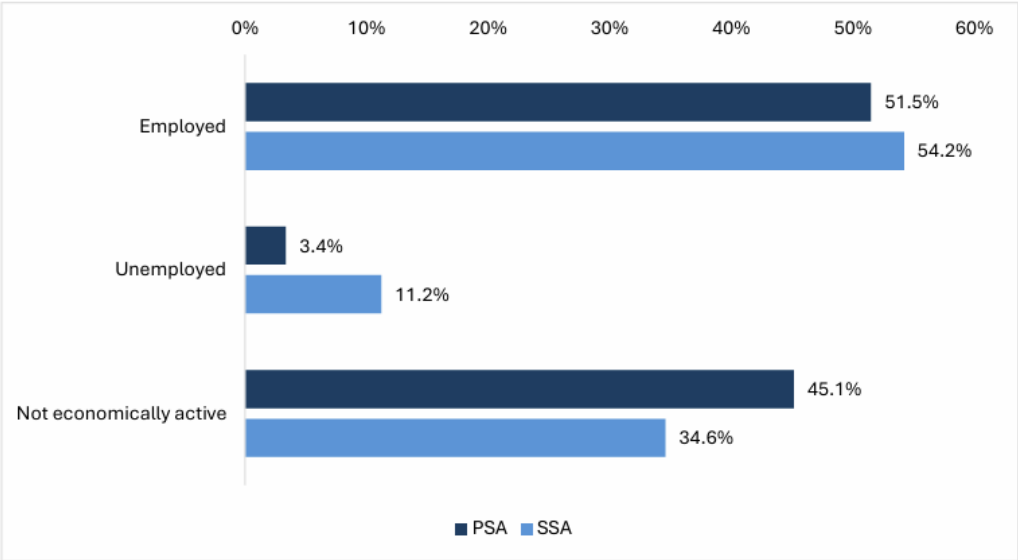


(Urban-Econ via Quantec EasyData, 2026)

Employment:

The employment rate in the PSA is marginally higher than in the broader SSA, with a difference of approximately 3 percentage points. Both display a value significantly higher than the national average of 40%, indicating a population with higher average standards of living. The SSA has a significantly higher unemployment rate highlighting the persistent inequalities between the broader

district and the PSA. In contrast, the PSA has the largest proportion of people who are not economically active, comprising just under half the working aged population.



(Urban-Econ via Quantec EasyData, 2026)

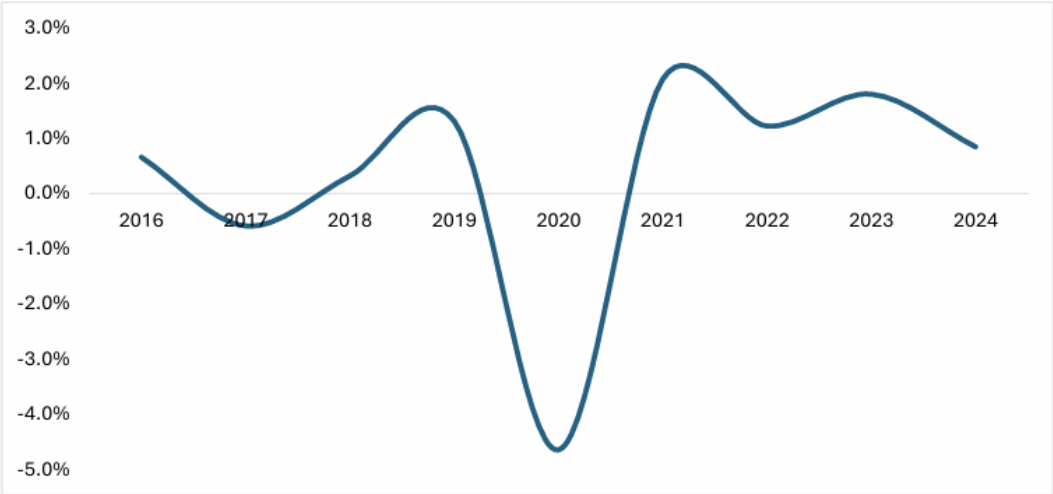
Household income:

The largest proportion of households in PSA fall into the R266,511 – R533,021 annual household income bracket, which is the higher middle-income band. This is followed by households with R533 022 – R1 066 042 annual household income, who fall at the lower end of the high-income band. This indicates a **high average household annual income within the study area**, translating to strong purchasing power and demand for quality amenities. This is specifically relevant to the proposed hotel, office, and residential components, as these uses are well supported by the area's strong purchasing power. Together, they facilitate capital circulation and investment within the precinct, reinforcing the economic viability of the development.

Economic overview

Gross Value-Added growth:

GVA measures the value of goods and services that are produced in an area, industry or sector of an economy, representing the difference between output and intermediate consumption. It is commonly used as an indicator of the economic performance of a local or regional economy or sector.



(Urban-Econ via Quantec EasyData, 2026)

The SSA (Table Bay District) experienced GVA growth in 2018 and 2019, following which the Covid-19 pandemic caused a sharp contraction in the economy in 2020. There was significant recovery in 2021, with subsequent fluctuations in 2022 and 2023, after which the GVA growth rate declined again in 2024 to around 1%. GVA growth for the past three years has fluctuated between approximately 1% and 2%, indicating moderate economic growth

The local economy was dominated by the finance, insurance, real estate and business services sector, indicated the prevalence of services to local economic activity. The other key sectors in the SSA in 2025 were transport, storage and communication – due to the activities of the Port of Cape Town – as well as the manufacturing and trade, catering and accommodation sectors.

Sectoral employment distribution:

Employment in the SSA is concentrated in the finance and business services sector, the trade, catering and accommodation sector and the community and personal services sector. This indicates the prevalence of service provision to local employment.

Sector	Proportion of employment (2025)
Agriculture, forestry and fishing	2,0%
Mining and quarrying	0,1%
Manufacturing	8,9%
Electricity, gas and water	0,2%
Construction	3,4%
Wholesale and retail trade, catering and accommodation	23,3%
Transport, storage and communication	5,0%
Finance, insurance, real estate and business services	29,3%
General government	6,1%
Community, social and personal services	21,6%

(Urban-Econ via Quantec EasyData, 2026)

8.2.	Explain the socio-economic value/contribution of the proposed development.

The proposed mixed-use development incorporating residential, retail and hotel components is expected to contribute positively to the retail, hotel and residential market. The socio-economic impact assessment made use of the Social Accounting Matrix (SAM) model to quantify the potential

economic impacts associated with the construction and post-construction activities of the proposed development.

The impacts that occur during the construction phase of the development are of a temporary nature and therefore have a temporary impact. The post-construction phase, however, can last for decades, thus the impacts that occur in this phase are considered to be sustained. The economic impacts during the construction and post-construction phases can be viewed in terms of a change in the following:

- **Job creation:** the number of additional jobs created. This includes jobs in planning and constructing the development, as well as long-term jobs that will be created post-construction of the development. Indirect and induced job creation will also occur due to the direct job and income creation.
- **Value-added or GDP:** the value of all final goods and services produced during a one-year period within a specific area, as a result of the economic activity generated by the development. This includes direct, indirect and induced impacts, and occurs during both the construction and post-construction phases of the development.
- **Business output:** the value of all inter- and intra- sectoral business sales generated in the economy due to the planning, construction and post-construction of the development.

Any of these measures can indicate an improvement in the economic well-being of residents in the area surrounding the proposed development, which is generally the goal (or a goal) of an investment project. The net economic impact is usually viewed as the overall expansion or contraction of an area's economic activity resulting from the changes induced by the development. The magnitude of these impacts will be influenced by the details of the project (such as land-use mix, technologies employed, use of imported vs local goods and services, use of funding etc), as well as the nature of the project environment (property market cycles, interest rates, the structure of the economic sectors primarily influenced by the development etc.).

The table below provides an overview of the impacts modelled for the capital expenditure (CAPEX) on the proposed development:

Table 2: Impacts modelled (CAPEX)

Capital Expenditure	
Additional new business sales (additional production/output)	The construction of the infrastructure and buildings will lead to the expansion of business sales for existing businesses in the local economy. These changes are measured in terms of new business sales – i.e., new economic activity that will be generated as a direct result of the capital investment in the development project.
Additional GDP	One of the most important indicators of economic growth and value is GDP. The GDP measures the value of all final goods/services produced in an economy in the span of a year.
Additional employment	Construction activities will result in direct jobs being created on the site and in other directly related sectors, such as transport and manufacturing. Indirect jobs are also created due to the multiplier effect on the economy. For example, expenditure on construction materials could result in the creation of additional retail jobs.
Additional household income	Employment of workers during the construction period will generate household income for their families through the payment of salaries and wages. Additional impacts on household income may occur through indirect and induced impacts resulting from project expenditure. Although temporary, this increase will have a positive effect on the standard of living for these households.

Table 3: Impacts modelled (OPEX)	
Operational (post-construction) Expenditure	
Additional new business sales (additional production/output)	The increased demand for goods and services for the maintenance and post-construction purposes of the proposed development will generate additional economic activity, measured as new business sales or additional production.
Additional GDP	The generation of additional business sales and employment opportunities will create an ongoing ripple effect through the local economy, resulting in an increase in the value of goods and services (measured in GDP).
Additional employment	New activities due to the proposed development, including the proposed hotel and retail space, will create new employment opportunities. Ongoing operation of the proposed development, including maintenance, will also eventually be able to contribute to employment.
Additional household income	Employment due to the post-construction and maintenance of the proposed development will generate personal income, contributing to the household incomes of the workers employed. This will positively affect the living standards of these households.

8.3.	Explain what social initiatives will be implemented by applicant to address the needs of the community and to uplift the area.

Various community needs have been identified and considered in the development of the proposed concept design. These include the retention of the Sea Point Library and hall, and incorporation of an ECD centre into the design.

The Colin Eglin Sea Point Library

The Sea Point Public Library is a large community library and the only public libraries in the surrounding area are in Camps Bay and the City Centre. The library is used by both local residents and learners from the surrounding areas. It plays a significant role in the social and educational wellbeing of the surrounding community but does face challenges including a lack of sufficient space, inefficient layout, multimedia resources, study and work areas.

The proposed development includes the potential extension of the library which would not only preserve the function of the library but also increase its capacity.

Sea Point Civic Centre

The civic centre includes a major and minor hall which serve the surrounding community, rented out for events such as weddings, awards ceremonies and other private occasions. Facilities within the civic centre include the major hall that can host a maximum of 300 people with a stage, a foyer area, a minor hall and a kitchen. The minor hall is not used separately from the main hall for events due to space constraints and noise conflicts.

The proposed concept design includes the retention of the major hall and potential use of the existing minor hall as a kitchen or café facility.

Pinocchio Crèche

The crèche was established in 1984 by the Domestic Workers Association as an early childhood development (ECD) and care centre for children working households in Green Point and Sea Point areas. This is still the primary focus of the crèche, but it has since expanded and caters for children from a wide range of areas and families living in the immediate area. The reputation of the crèche in the community has drawn in enquiries from travelling professionals and digital nomads.

The crèche caters to the longer working hours associated with blue-collar jobs and is a low-fee ECD relative to other such facilities in the Atlantic Seaboard area of the city. The crèche intends to expand into infant care and can currently accommodate 87 children. The high demand for placement at the crèche means that they could expand if they had more space.

The crèche is highly embedded in the local community. In addition to its prominent place as a desirable and accessible ECD, it is involved in the surrounding areas. Parents assist with fundraising activities for the crèche, which is also a central feeder to local schools. The crèche also has a reading programme with the nearby Sea Point Public Library.

The inclusion of a new ECD facility, as proposed in the concept design, is expected to increase capacity by providing more space and new facilities.

The Sea Point Public Library, Civic Centre and existing ECD are of high value to the surrounding community, providing essential social facilities and services. Overall, the proposed concept design has thoroughly considered the needs of the community by including the retention and upgrade of the library and hall, and provision for a new ECD within the civic node.

8.4.	Explain whether the proposed development will impact on people's health and well-being (e.g. in terms of noise, odours, visual character and sense of place etc) and how has this influenced the proposed development.

Once implemented, the proposed development is expected to have both positive and negative impacts on people's health and wellbeing. Negative impacts associated with the construction phase are largely temporary in nature, localised and mitigated through the implementation of an environmental management programme. Positive impacts are long-term and are associated with the post-construction phase of the development, and include residential, commercial and civic services anticipated to benefit people by providing housing, goods and service provision and public facilities (library, ECD and civic centre).

Noise, dust and vibration impacts associated with the construction-phase are expected, and these have been assessed and mitigation measures proposed in Section H. The concept design has been formulated with careful consideration of visual impact to ensure that once constructed, the buildings integrate well with the grain and massing of surrounding buildings. Additionally, the proposed concept is expected to create continuity with the retail character of the Green Point and Sea Point main road making the change in character of the site better align with the surrounding land uses. The site is currently underutilised, and the proposed concept is expected to integrate the site with the surrounding area and sense of place through the various civic services, residential and commercial components.

The table below summarises the positive and negative impacts on people's health and well-being identified in the Socio-Economic Impact Assessment (**Appendix G3**) that are expected to result from both the construction and post-construction phases of the proposed development:

Table 4: Positive and negative impacts on people's health and well-being

	Positive Health & Wellbeing Impacts	Negative Health & Wellbeing Impacts
Construction	• Temporary increase in job opportunities • Temporary increase in household income	• Traffic congestion • Change in sense of place (visual disruption) • Noise, dust and air pollution

Post-construction	• Long-term increase in job opportunities • Temporary increase in household income • Improved efficiency of civic activity • Long-term housing availability and affordable housing	• Traffic congestion • Change in sense of place (visual disruption)

SECTION H: ALTERNATIVES, METHODOLOGY AND ASSESSMENT OF ALTERNATIVES

The development concept for Erf 2187, Three Anchor Bay, was substantially shaped by pre-statutory public participation and specialist input before entering this statutory Basic Assessment process. It reflects a substantive, iterative process of design refinement that took place over more than a year prior to the publication of this BAR, informed by specialist assessments, engagement with City of Cape Town line departments, and two rounds of pre-statutory public participation. The preferred alternative, the mixed-use development concept as presented in this BAR, is the outcome of that process. This section documents the alternatives that were considered at each stage, explains why certain alternatives were not taken forward, describes how the concept was amended in response to specialist findings and public inputs, and motivates the preferred concept. In accordance with regulation 40(3)(h) of the EIA Regulations (GNR 326 of 2017, as amended), this section addresses alternatives in respect of the property and site, activity, layout, technology, and operations, and documents the methodology and outcomes of the alternatives consideration process.

1. Details of the alternatives identified and considered

1.1.	Property and site alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.
Provide a description of the preferred property and site alternative.	

The preferred and only property and site alternative is erf 2187 in Three Anchor Bay which is currently City-owned and entirely transformed, although underutilised. The site is approximately 4.5 ha in extent and is well-located for mixed-use development as it is surrounded by residential, retail, recreational and public open spaces.

Existing facilities on the site include the Colin Eglin Sea Point Public Library, Sea Point Civic Centre and Hall, Fives Football Green Point Sports Club, Glen Green Point Sports Centre (including the Atlantic Green Point Bowling Club), Pinocchio Crèche, and the Western Province Bridge Centre for the Western Cape Bridge Union. Additional on-site infrastructure includes an electrical substation, internal roads and parking areas.

The proposed development seeks to optimise the land use of the site and maximise its development potential to offer a mixture of residential, retail, and commercial opportunities. The proposed concept design includes the retention and upgrade of existing civic services on the site, as well as the preservation of identified heritage resources (library and civic centre complex and eucalyptus trees). The proposed concept design incorporates an ECD and electrical substation into the development. The site is located adjacent to the Green Point Urban Park and presents an opportunity to create continuity with the retail edge of the surrounding area, with additional tree planting along Helen Suzman Boulevard creating a visual screen in accordance with heritage guidance.

The two phases of pre-statutory engagement yielded approximately 185 comments from nearly 965 registered interested and affected parties. Key themes that emerged and were considered in refining the concept design included: traffic and access; the density, height and use mix of the proposed development; affordable housing; heritage concerns relating to the library, civic hall, and the Green Point Common; views and visual impact; and the provision of public space. The full record of comments received, and the project team's responses is documented in the **Pre-**

statutory Public Participation Report (Appendix F). Where comments were not incorporated into the concept design, reasons for not doing so are provided in that report.

The concept design presented in this BAR represents the preferred site and property alternative. No alternative sites were investigated, as the site is City-owned, specifically designated for mixed-use development and civic use in the 2023 Table Bay District Spatial Development Framework, and is the subject of the City of Cape Town's development mandate. The motivation for not investigating alternative sites is provided below.

Provide a description of any other property and site alternatives investigated.

No alternative properties or sites were considered for this project, as the proposed development is site-specific and relates to the City's intention to dispose of Erf 2187 in line with its strategic planning objectives. The site has been identified through the applicable spatial planning framework (TBDP, 2023: 109) as suitable for higher-density residential development, civic use, and institutional structuring open space.

In this context, the consideration of alternative sites is not regarded as reasonable or necessary, as the proposal is intrinsically linked to the optimal use and redevelopment of this specific, underutilised property. The site is well located in relation to existing infrastructure, public transport, and economic opportunities, which supports its suitability for the proposed development.

Given the site-specific nature of the proposed development, no alternative sites are considered reasonable or feasible. While potential alternatives have been identified and discussed at a high level, detailed impact assessment is limited to the no-go alternative and the preferred development option. The assessment further considers reasonable and feasible alternatives relating to the design, layout, and operational aspects of the development.

Provide a motivation for the preferred property and site alternative including the outcome of the site selection matrix.

The proposed development is site-specific and relates to the redevelopment of Erf 2187, a City-owned property identified for disposal and future development. As such, a comparative site selection matrix is not considered applicable in this instance, as the proposal is intrinsically linked to the optimal use of this specific, well-located and underutilised site.

The elements which give identity to Green Point and Sea Point neighbourhoods surrounding the site are understood and have been incorporated into the proposed development to enhance and consolidate the special character of these precincts, including but not limited to the retail character of the area, preservation of features of heritage significance and intentional activation of the pedestrian and public network to create continuity with the surrounds. The proposed development intends to maximise the use of well-located transformed land, close to employment opportunities and economic nodes. It is anticipated to include:

- **commercial uses** including retail and hotel opportunities;
- **residential space** for affordable, middle- and high-income housing;
- **preservation and enhancement of the civic uses** on the site including the Sea Point Public Library and civic centre, and provision for a new crèche.

The proposed development aligns with the land use of the surrounding area as well as with the relevant planning frameworks. **Notably, the Table Bay District SDF indicates that the site is earmarked for high density residential development, institutional structuring open space and civic use.** The proposed concept includes high density residential development and the retention and upgrade of the civic node. In alignment with open space services, the retention of the existing

eucalyptus tree glade on the eastern side of the site and existing Fan Walk treed avenue along Main Road is expected to contribute positively to the pedestrian public environment, along with some recommended additional landscaping and tree planting.

The site is already transformed, and the proposed development therefore supports infill development[1] and avoids urban sprawl. The green network included in the proposed concept design builds on existing site conditions and environmental informants to establish a connected landscape framework that integrates the proposed development with its surrounding context, including the adjacent promenade.

Provide a full description of the process followed to reach the preferred alternative within the site.

The preferred site is the only site alternative, and the proposed concept design has undergone an iterative design process. This process included stakeholder and public engagement, as well as specialist input, during the information sharing phase and concept design phase.

The information sharing phase included the compilation of status quo reports by the project team (including environmental, heritage, civil services, architectural, socio-economic and traffic). A commenting period occurred between April and May 2025 for the public to submit inputs and share information about the site. This included an online public meeting and open house event where status quo information about the site was shared, and project team were available to discuss the site. The inputs from this phase informed the first draft concept design, which underwent a commenting period in November to December 2025. The draft concept design was presented in poster format at a public open house event, and the comments received during this phase have informed the concept design proposed in this report. Refer to **Appendix F for the Pre-statutory Public Participation Report,** including a Comments and Responses Table which details how the comments received have been responded to and addressed, where appropriate, in the proposed revised concept design.

The purpose of the development concept is to establish the technical feasibility of a maximised development envelope. Although the final development design will depend upon the proposals put forward by developers and ultimately selected by the City of Cape Town, the proposed concept design establishes principles, structure, and parameters within which development can occur. Future development will have to comply with prescribed mandatory requirements such as height and massing, setbacks, facade articulation, access, urban structure and structural landscaping. Specialist input has been a key informant to ensure the feasibility of the proposed concept design, and the various specialist impact assessments can be found in **Appendix G**.

The descriptions and motivations for the proposed activity, design and layout are addressed in the following sections.

Provide a detailed motivation if no property and site alternatives were considered.

The site was chosen for the proposed mixed-use development intentionally, identified for new development (potential high density residential development) and civic use in relevant policy and planning frameworks (TBDP, 2023: 43 and 109). The City initiated the conceptual framework and status quo analysis to determine the feasibility of redeveloping the site. The proposed concept design has been designed through an iterative design process to guide the future development

[1] the process of constructing new residential or commercial projects on vacant, abandoned, or underutilized parcels of land within existing, built-up urban areas.

of the site to maximise its development potential in the context of the surrounding land uses and massing.

The proposed development aligns with the land use of the surrounding area as well as with the relevant planning frameworks. Mixed-use developments support spatial efficiency, as opposed to mono-functional land use, as does locating residential areas close to work opportunities. The site is approximately 4.5 ha and is well-located for mixed-use development as it is surrounded by residential, retail, recreational and public open spaces. The site occupies a strategic location, linking Cape Town's western seaboard and the Central Business District (CBD). Positioned at the convergence of key transport routes, it functions as a nexus connecting several surrounding precincts and neighbourhoods. This makes the site well-located for residential space, which is an increasing need in the City, as well as hotel opportunities due to the close proximity of the site to popular tourist destinations in the City's CBD (e.g. Green Point Stadium). The existing retail edge along Green Point Main Road and Sea Point Main Roads has a particular retail character dominated by a diversity of cafes and restaurants outlets and some small-scale malls, with a few franchised food outlets. The proposed development is intended to create continuity across the main road edge of the site with this retail character.

Given the prime location, high value and potential of the site for development opportunities that create continuity with the surrounding environment, in alignment with the City's relevant policies, erf 2187 is the only site considered in this application.

List the positive and negative impacts that the property and site alternatives will have on the environment.

The site is already developed with no natural ecosystems or environmental concerns. The eucalyptus glade on the eastern side of the site has heritage significance and is retained in the proposed design concept, as well as the bordering Main Road (Figure 4). The following impacts have been identified:

Positive Impacts:

- Amenity value – continuity with the main road interface and surrounding retail character
- Provision of residential space (including affordable housing) in close proximity to economic opportunities
- Contributions to the GDP and production in the local economy
- Household income generation
- Government revenue generation (City-level revenue from property taxes, as well as national-level revenue from corporate income tax paid businesses and personal income tax paid by employees)
- Job creation and skills development across a range of sectors, including retail, hospitality and facilities management
- Improved security (associated with improved use of an underutilised space)
- Retention and upgrade (where appropriate) to the civic node on site

Negative Impacts:

- Potential increase in traffic
- Construction-related impacts including noise, dust and vibration
- Visual impacts associated with the proposed building heights
- Loss of former green open space as a visual amenity

These impacts are discussed in detail in the impact tables provided at the end of this section.

1.2.	Activity alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred activity alternative.

The proposed concept design provides a framework to guide future development, establishing principles, structure, and parameters within which future development can occur. The actual design of the site will be undertaken by the developers of the site. The main activities associated with the proposed mixed-use development are residential, commercial (including retail and hotel development), potential office space, civic services (including the library and civic centre) and crèche, with networks of pedestrian and green spaces. The various land uses included in the concept design are listed below:

Civic services including the retention and upgrades:

- Retention of the Sea Point Civic Centre and Hall
- Retention and upgrade of the Sea Point Public Library with a proposed extension and additional development bulk envisaged above the existing building footprint (design subject to heritage, structural, visual impact and architectural specialist input at Precinct Plan stage, consistent with the conditions set out in the Heritage Impact Assessment).
- Above ground parking bays and access to basement parking
- New location for a crèche

Residential and commercial components

- Residential (including affordable, middle- and high-income housing)
- Hotel space
- Retail space
- Office and other business land uses
- Internal roadways and access to basement parking

Vehicular and pedestrian network

- Class 5B and 5C internal roadways
- Pedestrian linkages between the site and surrounding areas
- Three levels of basement parking

Green and open space

- Hard and soft landscaping internal to the site along access roads and internal pedestrian routes
- Retention and preservation of eucalyptus trees on the eastern side of the site
- Retention and preservation of the trees bordering the site along Sea Point Main Road forming part of the extended Cape Town Fan Walk
- Inclusion of pedestrian and public space network

The description and motivations for the preferred design and layout alternative describe these aspects in more detail in the sections that follow.

Provide a description of any other activity alternatives investigated.

The proposed concept design has undergone various iterations informed by public and specialist input which during "activity" alternatives were considered. Due to the nature of the project being a proposed Concept Design, the activity alternatives can be considered as different land uses for the site. Due to the location of the site within the urban area, surrounded by mixed-use developments and destination places, the proposed mixed-use development is considered an appropriate activity for the site. Based on the context of the site and surrounding land uses, the

proposed residentially led mixed-use development is the only activity alternative considered in this report. See the response below for motivation for the preferred activity.

Provide a motivation for the preferred activity alternative.

The key motivation points for the proposed Concept Design include:

- Alignment with the municipal and local frameworks, responding directly to the increasing need for residential housing in and around the central business district.
- Provision of much-needed residential opportunities (including market-led affordable housing)
- The inclusion of retail offerings to enhance the connectivity and continuity of the site with the surrounding retail character, activating the Main Road street interface.
- The retention and enhancement of the capacity and functionality of the existing civic node on the site.

The proposed concept design incorporates various analyses, specialist inputs and considerations of key design informants based on the site context. Additionally, the public engagements undertaken to date have informed the iterative design process which has considered multiple layouts and massing alternatives.

Socio-Economic Impact Assessment

The components of the proposed mixed-use development were informed by the property market analysis which was one of the reports compiled to determine the feasibility of the proposed development, and informed the Socio-Economic Impact Assessment (Appendix G3). This analysis showed that there is a large demand for residential housing which is steadily increasing, and the site has the potential to accommodate market led affordable and middle- and high-income housing in a cross-subsidised residential development. The modelling also indicated that retail offering and hotel use be considered. Retail opportunities could include convenience and food services, as well as destination retail opportunities as exemplified by the Mojo Market in Sea Point. Destination retail, residential and hotel offerings on the site can be mutually beneficial and attractive given the close proximity of the site to popular tourist destinations (e.g. Cape Town Stadium, Table Mountain etc). The market analysis also highlighted that the retention of the civic centre, library and crèche could add value to the development as spaces like these are limited in the City giving these aspects important community value.

Planning and policy

Mixed-use intensification is described in the 2023 Table Bay SDF (TBDP, 2023: 73), which highlights Main Road as an example of a business strip area where such development is encouraged: "Encourage greater land use intensification of an appropriate combination of land uses, including office and retail, business and commercial, institutional and social facilities, and high-density residential development along identified development corridors". The proposed concept design aligns with these land uses. The 2023 City of Cape Town SDF also highlights conditions required to meet the desired spatial objectives for the City, including the need for rapid release of land for mixed-use development including affordable residential development (MSDF, 2023: 26). Sub strategy 3.2 of the MSDF, P25.8 states the implementation intent of the City to "*Increase residential supply through the development of mixed income, diversified tenure and higher-density housing in the urban inner core, within new development areas (NDAs) and development focus areas (DFAs) identified in the DSDFs, acknowledging the need for intensified use and high-quality open spaces and community facilities*". This site is earmarked in the Table Bay SDF as a potential high residential development area with structuring open space (TBDP, 2023: 109), as well as civic use, which aligns with the proposed concept design.

Public inputs

Public comments indicated a desire for public access, green open space, recreational use, housing opportunities with concerns themed around visual, heritage and traffic impact. The site is surrounded by public and privatised recreational spaces such as Green Point Urban Park, Sea point Promenade, Green Point Tennis Club, Virgin Active, and Athletics Stadium. The site is already developed and does not form part of the Green Point Urban Park or heritage protection zone. The proposed mixed-use development seeks to optimise the use of the site to address the increasing need for residential space while integrating the development into the surrounding contextual framework by including commercial development and civic uses. Additionally, the massing of the concept design carefully considers and incorporates visual and heritage indicators, as well as incorporates vehicular, pedestrian and green space networks (described in the design and layout section below). The proposed concept design therefore represents a well-informed proposal intended to enhance connectivity with surrounding areas, integrate the site with the surrounding urban environment, and support the City's community and economic needs.

Provide a detailed motivation if no activity alternatives exist.

The response above outlines why the activities and land uses proposed in the concept design are the only ones being assessed and considered. Other activity alternatives would not achieve the desired objectives for the site which respond to the increasing need for residential space, consideration of the surrounding land uses and retail character, and prioritisation of the preservation and enhancement of the civic node on the site. The proposed preferred activity – the mixed-use development of the site – aligns with the City's relevant policies and provides an opportunity for infill development, avoiding urban sprawl, enhancing connectivity with surrounding areas, integrating the site with the surrounding urban environment, and supporting the City's community and economic needs.

Planning and policy

The Table Bay District Plan (2023) indicates the following for the site (shown in Figure 19)

- It is recognised as Community Civic Cluster.
- A portion of the site is designated as an institutional structuring open space.
- A portion of the site is designated as a new development area with potential for high density residential development.
- The site falls within a local node.

Therefore, the proposed concept design aligns with the relevant spatial planning frameworks (refer to Section E of this report for more details).

Cape Town Sky Train / Foreshore Rail Terminus: Note on Public Comments Received

During the pre-statutory public participation process, a number of comments were received proposing that the site make provision for a terminus for the Cape Town Sky Train, an elevated rail concept proposed by Gareth Ramsay. I&APs noted that Erf 2187 represents a strategically located and relatively large parcel of land on the Atlantic Seaboard, and suggested that it could potentially accommodate a metropolitan-scale public transport intervention. The full record of these comments and the project team's responses is provided in the Pre-statutory Public Participation Report (Appendix F).

While this proposal has been noted, it is not considered a reasonable or feasible activity alternative within the scope of the current Basic Assessment. The proposed Sky Train represents a metropolitan-

scale transport intervention that would require its own strategic planning processes, including transport feasibility assessments, funding considerations, and a separate environmental authorisation process, undertaken at the appropriate scale.

At present, the concept does not form part of any adopted transport planning framework, including the City's Comprehensive Integrated Transport Plan (2023–2028), and no provision has been made for such infrastructure at a policy or implementation level. Furthermore, passenger rail infrastructure planning remains a national competency.

The proposed development is consistent with the applicable spatial planning framework, which identifies the site for high-density mixed-use development and civic uses. In this context, the Sky Train proposal is not considered a reasonable or feasible alternative to the proposed activity.

Notwithstanding the above, the proposed development does not preclude future public transport improvements in the area. Should metropolitan-scale transport initiatives be pursued in future through the appropriate planning and approval processes, these would be assessed independently of the current application.

List the positive and negative impacts that the activity alternatives will have on the environment.

Positive Impacts:

- Amenity value – continuity with the main road interface and surrounding retail character
- Provision of residential space (including affordable housing) in close proximity to economic opportunities
- Contributions to the GDP and production in the local economy
- Household income generation
- Government revenue generation (City-level revenue from property taxes, as well as national-level revenue from corporate income tax paid businesses and personal income tax paid by employees)
- Job creation and skills development across a range of sectors, including retail, hospitality and facilities management
- Improved security (associated with improved use of an underutilised space)
- Retention and upgrade (where appropriate) to the civic node on site

Negative Impacts:

- Potential increase in traffic
- Construction-related impacts including noise, dust and vibration
- Visual impacts associated with the proposed building heights
- Loss of former green open space as a visual amenity

These impacts are discussed in detail in the impact tables provided at the end of this section.

1.3.	Design or layout alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts

Provide a description of the preferred design or layout alternative.

Proposed design and layout:

The preferred design or layout alternative is a residentially led mixed use development that includes commercial and hotel development, the retention and enhancement of the civic node, and the integration of a green network into the design. The proposed concept design for the development is shown below in Figure 23. The concept design includes consideration of contextual massing which has informed the proposed podium layout, towers and setbacks which accommodate key view corridors.

Figure 23: Mixed-use development as proposed in the concept design (ACG architects)

Maximum building heights:

The proposed building heights have been determined with consideration of the need to maximise development potential of the well-located site while responding to the surrounding urban context in terms of scale, grain, and existing built form. The varied height profile creates hierarchy and a coherent urban skyline (Figure 24).

Along Main Road, a consistent four-storey podium establishes a strong and active street edge. Above this podium, the majority of tower elements rise to approximately 30 meters. At key locations, identified as Points A, B, and C, the building heights increase to 45 meters. These taller elements function as landmarks and visual markers along Main Road, framing important moments along the route and creating identifiable bookends within the urban structure.

Along Helen Suzman Boulevard, the development adopts a similar approach, with buildings generally formed by a four-storey podium that engages the street, supporting taller tower elements rising to 45 meters.

The massing strategy establishes a height gradient with the lower-scale podiums (two to four storeys) defining the public street interface, with more slender tower elements rising from this base. This approach aims to ensure an active and human-scaled streetscape that prioritises pedestrian use while accommodating increased density above.

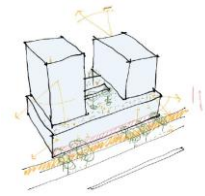
Figure 24: Maximum building heights proposed in the concept design (ACG architects)

Proposed layout and massing typologies:

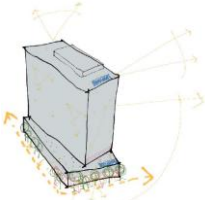
The various elements shown in Figure 25 are numbered and described below:

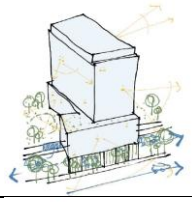
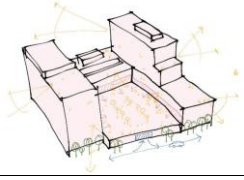
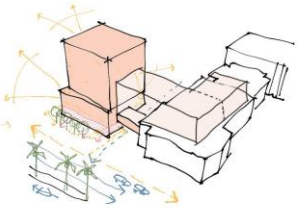
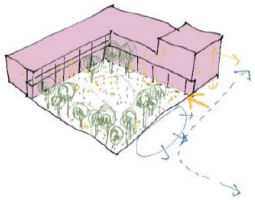
Figure 25: Proposed layout of mixed-use development (ACG architects)

1) Podium and tower typology: the four-storey podium respond to the street scale with the above tower elements visually separated to reduce perceived bulk



2) Hotel typology: two- to three-storey podium with a tower component expressed as a distinct element above



3) Helen Suzman Boulevard edge: variation of podium-and-tower typology is applied as singular building blocks creating a permeable edge	
4) Retail square typology: potential retail square with retail uses at podium level and residential and mixed-uses above	
5) Library addition massing: library extension conceived as a two-level podium, with the library located on the second level and connected to the existing library via a lightweight bridge. Retail opportunities are proposed at ground level, with potential for a lightweight sensitive addition above the existing library.	
6) Crèche typology: a simple L-shaped building that encloses and defines a secure outdoor play area	

Civic node on the western side of the site:

It is important to note that this extension and/or addition above the existing library will need to be undertaken by an architect with the relevant expertise in modernist buildings and will be subject to detailed assessment from a heritage perspective. This component is included solely to reflect the site's potential development capacity and to ensure that the full extent of the possible future development footprint is considered at a strategic level. As such, this part of the proposed concept design is indicated in hashed lines in the conceptual frameworks presented in this report.

The reconfiguration of the civic node on the site is aimed at improving the organisation, accessibility and activation of the civic precinct. Details regarding the existing functionality of the civic node can be found in the Urban Design Report (page 53) – **Appendix L1**. Engagements with the City's Community Services and Library Services departments highlighted several key findings regarding the current functionality of the civic precinct, and these needs present an opportunity to rethink the library as a more contemporary civic facility that integrates community services and learning spaces. The proposed design introduces strategic improvements to enhance the civic precinct's functionality, strengthen its civic presence, and respond to the unique characteristics of the site, as described below:

1) **Spatial reconfiguration**
   - **A.** The existing Minor Hall is proposed to be converted into a kitchen/ café area which offers the opportunity to activate the public forecourt.
   - **B.** The existing library reading room is proposed to be transformed into an activity room. This allows the space to function independently from the Civic Hall and to accommodate smaller gatherings, meetings, and community events that are not suited to the larger venue. This move also resolves the current acoustic challenges that prevent the two halls from operating simultaneously.

2) **Provision of additional library space**
   A. The proposal identifies the opportunity to provide additional library space as an extension to the rear. This allows the library to operate on a single floor level, improving accessibility, functionality, and internal organisation. This presents a unique opportunity to overlook the Sea Point Promenade and the ocean, creating a distinctive civic space with exceptional views.
   B. Below the library extension a ground floor retail component is proposed to activate the public interface.
3) **Capitalising on the site's location**
   A. The corner location allows for a tower element to anchor the new development on Beach Road and act as a landmark to the civic node and broader development.
4) **Possible additional bulk**
   A. The design allows for the possibility of increasing the building bulk above the library with a sensitive lightweight addition. This addition offers the opportunity to overlook the public forecourt and Three Anchor Bay Road at the upper levels. This is an indicative concept that will require further detailed design and heritage approvals before it can be proceeded with.
   B. Additional bulk is also possible above the existing parking area.

Note that while the development concept identifies an opportunity to incorporate building bulk above the library with a sensitive lightweight addition, **this is an indicative concept that will require further detailed design and heritage approvals before it can be proceeded with**. This addition, if pursued by the developer, can overlook the public forecourt, thereby enhancing passive surveillance of this public space.

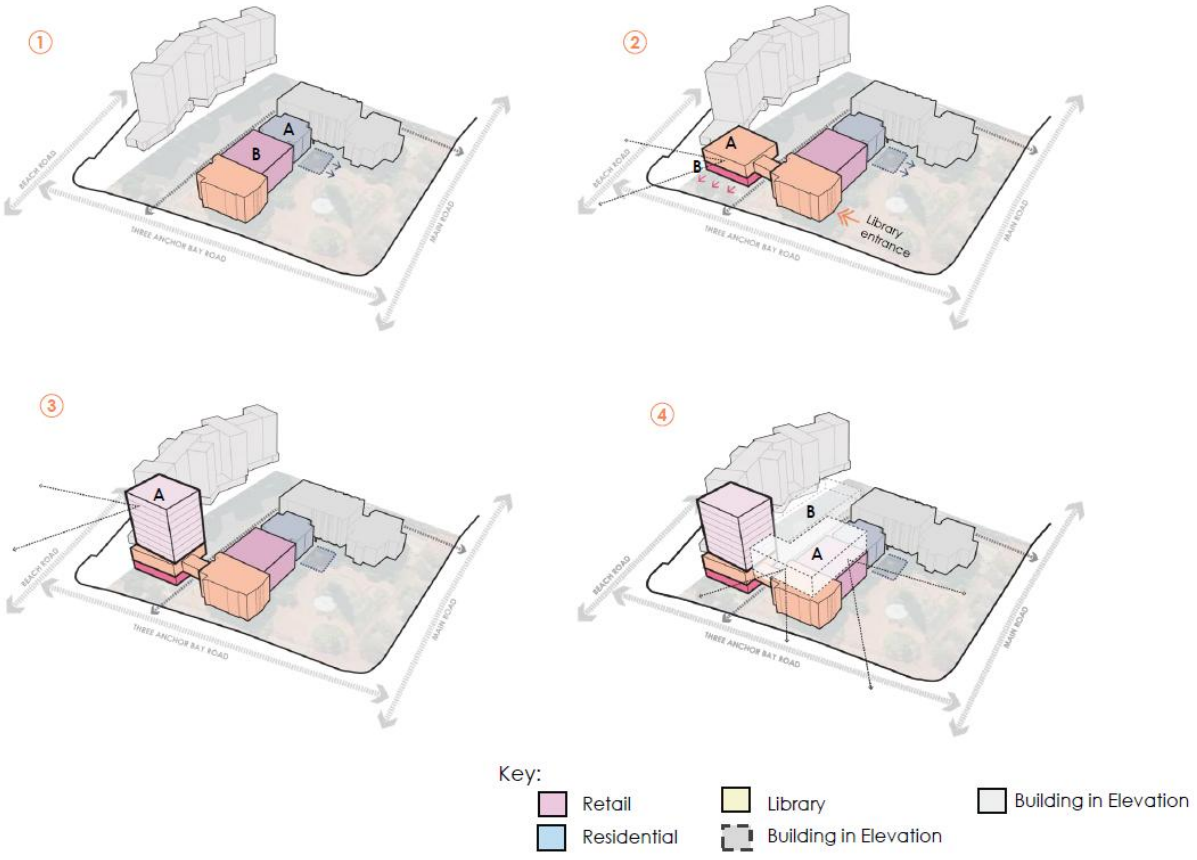


Figure 26: Spatial reconfiguration and additional development potential in the civic node precinct (ACG architects)

The proposed adaptations to the civic node and new location for a creche facility adjacent to the node is shown in Figure 27.

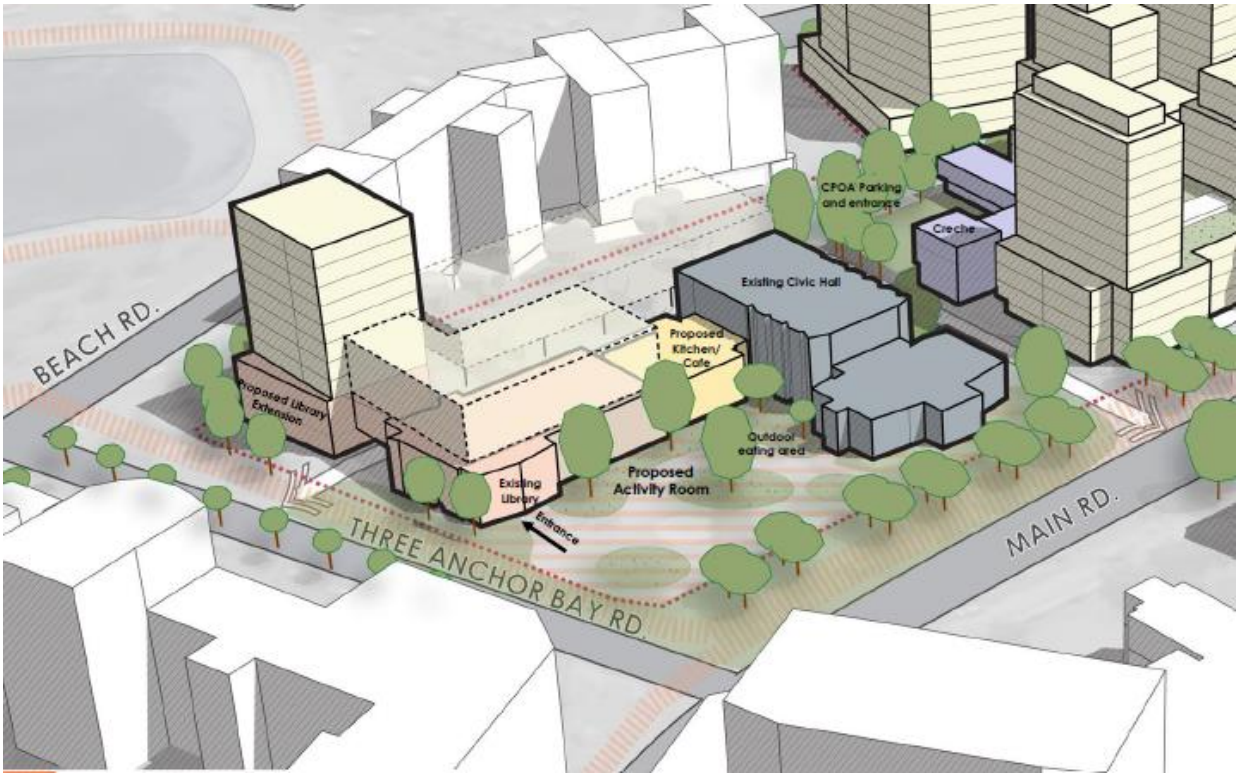


Figure 27: Proposed civic node precinct 3D massing (ACG architects)

The detailed reconfiguration of the civic node is shown below, as well as its relationship with the adjacent development concept.

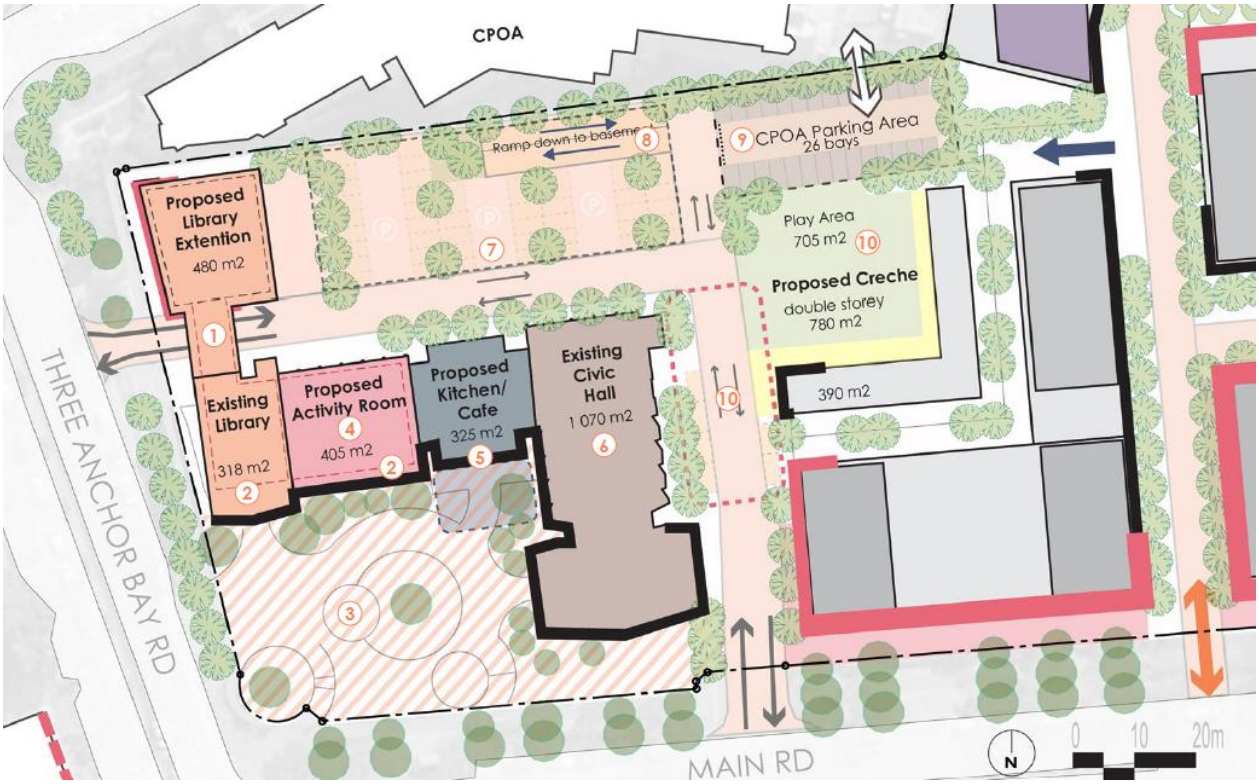


Figure 28: Proposed concept design for the civic node precinct

1) The proposed library extension, including a bridge connection linking to the existing library building above the internal road.
2) The dashed line illustrates the proposed sensitive addition above the existing library, which can either take form above the library entrance and the activity room or only above the existing library entrance.
3) The existing library entrance and forecourt space are retained, maintaining the current civic arrival point.
4) The incorporation of an activity room within the current library reading room allows for smaller gatherings to function independently from the Civic Hall.
5) The conversion of the existing Minor Hall into a café with outdoor seating, activating the public forecourt and enhancing the civic interface.
6) The existing Civic Hall is retained as a key community facility within the precinct.
7) A series of parking courts are introduced to provide public parking for civic users. This area is proposed as a multipurpose landscaped court that allows the space to accommodate parking and community gathering when necessary.
8) Access ramp to the basement below to accommodate additional parking requirements.
9) A dedicated parking area and secure access point are provided for the CPOA facility.
10) A new crèche with access from the existing road that wraps around the civic functions, with an on-street stop-and-drop facility.

Further development of the internal layouts and spatial arrangements will be required in collaboration with the relevant City line departments to ensure the concept responds to operational, functional, and maintenance requirements. With regards to the potential development above the existing library, this will require input from heritage, structural, visual impact and architectural consultants.

Internal road network and basement parking:

The proposed vehicular network is intended to enhance connectivity and permeability between the site and its surrounds. To the south of the site, St Bedes Road and Richmond Road are proposed to extend across Main Road into the development, reinforcing existing movement patterns and improving accessibility. The intersection of Richmond Road and Main Road is envisioned as the primary entrance to the development and is proposed to be signalised to ensure safe and efficient access. Along the northern edge of the site, adjacent to Helen Suzman Boulevard, access points are proposed as left-in and left-out movements to minimise disruption to the existing traffic flow. All proposed intersections will comply with the required intersection setbacks as determined by the transport engineer.

The new internal streets are envisioned as pedestrian-focused environments, incorporating wide sidewalks, landscaping, and active building edges to create a high-quality public realm. Carriageway dimensions will align with Class 5B and 5C road standards.

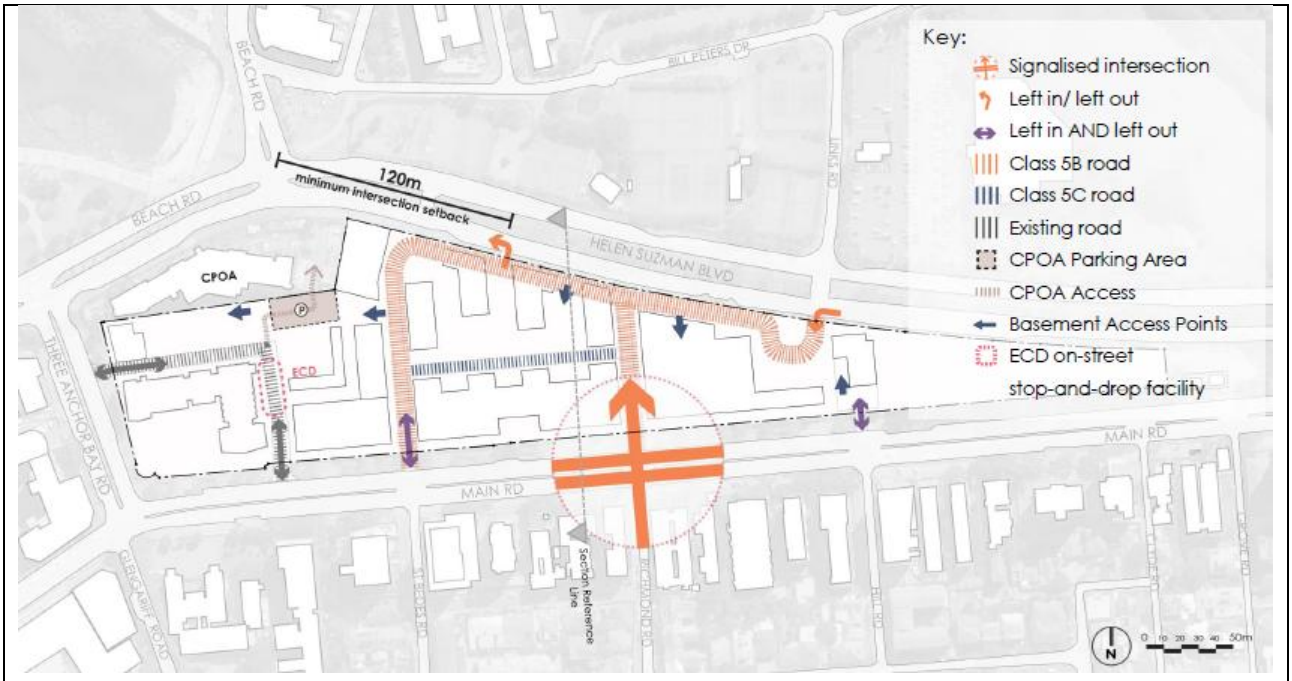


Figure 29: Proposed vehicular network (ACG architects)

The existing road surrounding the civic node will be retained as part of the network, and the basement access is indicated in Figure 29. The proposed basement parking structure accommodates approximately 1895 parking bays, with an additional 80 parking bays, contributing to a total of 1975 parking bays on the site in total.

Basement Parking Level -1 Basement Parking Level -2 & -3

Figure 30: Basement parking (ACG architects)

Green space network:

The proposed concept design includes a green network to connect the site with the surrounding landscape framework, including the adjacent promenade. The key components are listed below and shown in Figure 31:

1) **The retention of the eucalyptus glade** which holds heritage significance. Due to the protected status of these trees and the spatial constraints they impose, the area beneath the canopy will remain largely open and flexible in use
2) **The existing Fan Walk treed avenue will be retained** to preserve its distinctive character and to strengthen pedestrian connectivity. The building edge is offset from the site boundary along the edge to protect the existing tree root zones.
3) **Tree roots protection zones** are highlighted to protect the existing trees to be retained including the existing trees along the Fan Walk avenue as well as the Eucalyptus glade on the easter portion of the site.

4) **Landscaped sidewalks and tree planting** will be incorporated within the proposed road network to create a comfortable pedestrian environment
5) **Additional tree planting** along Helen Suzman Boulevard will act as a visual screen in accordance with heritage guidance
6) **A residential pocket park** is also included in the network
7) **Bioswales** for stormwater management
8) **Landscaped parking courts to reduce visual impact and improve microclimate conditions, and**
9) **Dedicated outdoor play areas** associated with the proposed crèche.

Figure 31: Proposed green network in the concept design (ACG architects)

Pedestrian network:

The proposed concept intends to improve the public space network via strengthened connections to surrounding public spaces and the inclusion of open spaces within the site (Figure 32):

1) The existing civic forecourt, which holds heritage significance, will be sensitively upgraded to enhance its function as an active public space. This will be achieved through the careful adaptation and activation of the existing civic buildings surrounding the node.
2) The existing Fan Walk will be enhanced through the introduction of an active retail edge. Restaurants and retail uses are envisaged to spill out onto the space, creating a vibrant pedestrian environment and strengthening the public realm.
3) The internal green space within the development is designed to primarily serve residents living within the precinct, providing accessible recreational and social space.
4) The retail square at first-floor level extends the activity of Main Road into an elevated public space overlooking the Green Point Urban Park, offering a unique retail and social environment for both the development and the surrounding neighbourhood.
5) The park to the west will function as a transitional landscape, mediating between the existing urban context and the new development.

6) The pedestrian network builds on existing routes and crossings, strengthening connections through the site and linking to major public spaces.

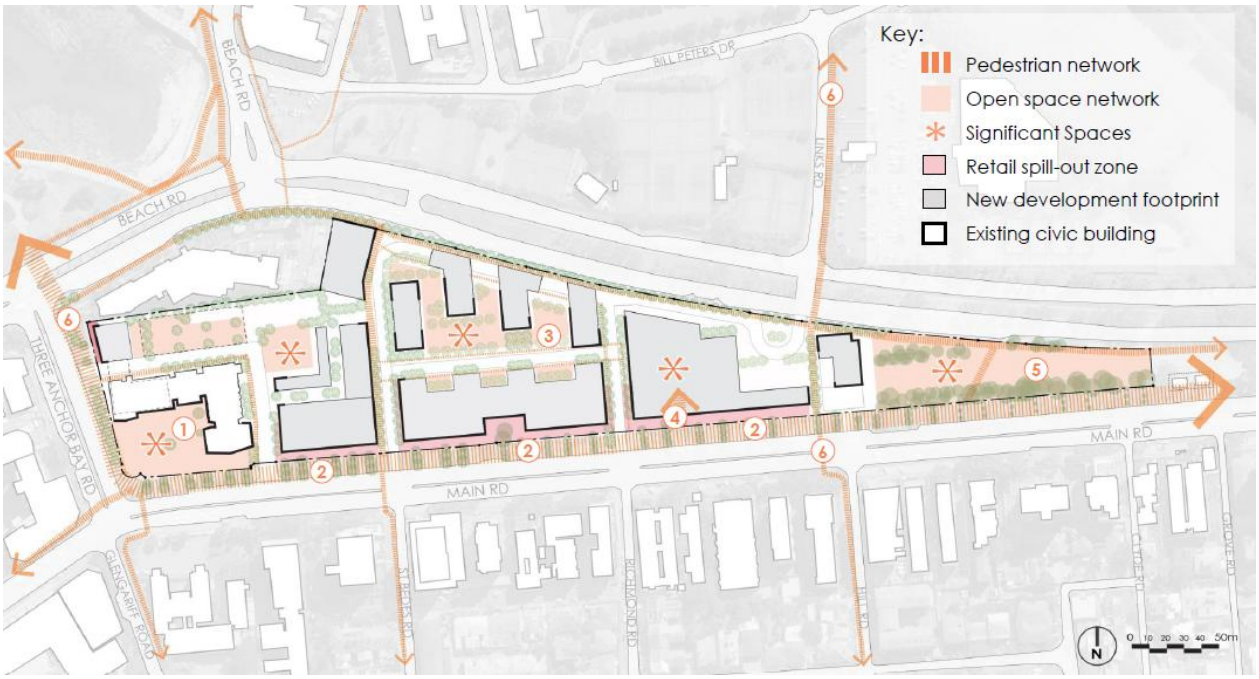


Figure 32: Pedestrian and public space network proposed in the concept design (ACG architects)

Provide a description of any other design or layout alternatives investigated.

Various design alternatives were considered during the development of the concept design. Different layouts were considered to determine the preferred size, arrangement, and form of new buildings. Therefore, only one design and layout alternative is being assessed in this report, along with the no-go alternative. Refer to the responses below which motivates why no design alternatives are being assessed.

Past conceptual frameworks

Although not assessed comparatively in this report, the previous conceptual development framework investigated in 2017 for the site consisted of large building blocks and the transformation of the site to a commercial structure, including the demolition of all current structures on the site. The current proposed concept design has taken a more inclusive approach to the community uses of the site, including the retention of the library, civic centre and crèche. The design has also adopted podium-style, fine grained buildings taking consideration of the existing patterns related to building massing, height hierarchy, urban grain, and edge conditions.

Socio-economic modelling of two options

The Socio-economic Impact Assessment (Appendix G3) includes the modelling of two land use options, with Option 1 providing more residential units and Option 2 including more office space.

Land use type	Retail (GLA)	Office (GLA)	Hotel (GLA)	Community (GLA)	Open market residential units	Affordable residential units
Option 1	8 379 m²	1 403 m²	5 094 m²	1 355 m²	915	230

Option 2	8 379 m²	13 063 m²	5 094 m²	1 355 m²	772	183

Note: Option 2 (preferred option) in the SEIA is assessed in the TIA and Scenario 2C

Option 2 is the preferred layout option, according to which the impacts will be analysed. The distinction between the two options is the greater residential unit allocation under Option 1, which has approximately 190 more residential units, while Option 2 has significantly more office space. The differences in impact between Layout Options 1 and 2 for the proposed development are minor. The main differences are the number of residential units, approximately 190 more residential units in Option 1 than Option 2. This would create more benefit for housing availability under Option 1. Conversely, the construction and operational positive impacts on GDP, employment and household income are slightly higher under Option 2, due to the inclusion of more office space. The below sections describe the modelled impacts associated with each option, as per the Socio-Economic Impact Assessment (**Appendix G3**).

Capital expenditure:

The economic impacts of the two options for the proposed development are modelled, based on capital expenditure of **R3.8 billion for Option 1** and **R4.0 billion for Option 2** (2026 prices). This **CAPEX** includes costs for preparation of the site, bulk infrastructure for the site and construction of the buildings, with additional provisions including contingencies and specialist installations. The assessment assumes that a large portion of the expenditure will circulate through the local and regional economy, generating direct, indirect and induced economic impacts. Industry-specific cost structures and standard construction-phase employment multipliers were applied to estimate job creation and GDP contributions.

Expenditure **during the construction phase** will primarily impact the building and construction sector, as well as the business services sector, which includes architects, engineers, real estate and insurance activities. Indirect and induced impacts will also affect the retail, manufacturing and transport sectors. In total, the proposed development is expected to add approximately **R3 billion to regional GDP** and create between **9 000 and 10 000 total employment opportunities**. The tables below present the detailed impact modelling results for each of the proposed options.

Option 1				
Impact	**Direct (construction)**	**Indirect (suppliers)**	**Direct**	**Impact**
Production (R millions)	R3 512,3	R2 989,2	R1 988,5	R8 489,9
GDP (R millions)	R1 249,2	R1 141,9	R802,4	R3 193,5
Income (R millions)	R587,3	R505,8	R323,2	R1 416,4
Employment (FTE)[2]	2 246	4 682	2 420	9 348

[2] Full-time equivalent

Option 2				
Impact	**Direct**	**Impact**	**Direct**	**Impact**
Production (R millions)	R3 677,9	R3 130,1	R2 082,2	R8 890,2
GDP (R millions)	R1 308,2	R1 195,7	R840,2	R3 344,1
Income (R millions)	R615,0	R529,7	R338,5	R1 483,2
Employment (FTE)	2 352	4 903	2 534	9 789

As shown in the above tables, Option 2 has greater positive capital expenditure impacts in terms of total production, GDP, income and employment opportunities.

Operational expenditure

Once the construction of the proposed development is completed, **the operation of the development** will have further impact on the local economy. Similarly to the construction phase, the impact of the operational phase is assessed by considering new business sales, additional GDP and the creation of employment opportunities. The new business activity generated by the operational phase will primarily impact the retail, business services and accommodation sectors. The tables below provide the detailed results of the impact modelling for the operational phase of each option for the proposed development.

Option 1				
Impact	**Direct**	**Indirect (suppliers)**	**Induced (salaries & wages)**	**Total**
Production (R millions)	R189,6	R100,6	R126,1	**R416,4**
GDP (R millions)	R111,8	R43,0	R51,0	**R205,8**
Income (R millions)	R48,6	R16,9	R20,6	**R86,0**
Employment (FTE)	1 292	117	154	**1 563**

Option 2				
Impact	**Direct**	**Indirect (suppliers)**	**Induced (salaries & wages)**	**Total**
Production (R millions)	R504,3	R141,4	R358,9	**R1 004,5**
GDP (R millions)	R393,0	R61,7	R145,3	**R600,0**
Income (R millions)	R148,0	R24,2	R58,6	**R230,8**
Employment (FTE)	2 170	168	441	**2 779**

The economic impact of the operational phase of the proposed development differs more significantly between the two options than the construction phase impacts do. **The positive impact of the operational phase of Option 2 is significantly higher, due to the inclusion of substantially more office space, which requires more inputs (in terms of goods and services) to be operated and maintained. Option 2 was therefore assessed as the preferred alternative in this BAR.**

Refer to the Socio-economic Impact Assessment for more details (**Appendix G3**).

Tree Protection Zones driven layout refinement:

An early iteration of the concept design placed developable building footprints closer to the Main Road boundary on the eastern portion of the site. Following completion of the Landscape Report (ACG Architects, 2026, Appendix L5) and the Heritage Impact Assessment (Malan and Postlethwayt, 2026, Appendix G1), this layout was refined.

The tree survey identified Tree Protection Zones (TPZs) for the mature eucalyptus trees along the Main Road boundary, calculated on the basis of canopy spread, tree height, and diameter at breast height. The Heritage Impact Assessment confirmed that these trees form part of a historically significant double tree belt that has defined the southern boundary of the Green Point Common since at least 1878. The trees along Main Road are not considered heritage resources but are to be retained based on their contribution to the surrounding landscape. The eucalyptus trees on the eastern side of the site have medium socio-historic significance (IIIB) and are therefore heritage resources of contextual and aesthetic significance.

The concept design was consequently amended to incorporate a **minimum 6 m setback from the site boundary along this edge, ensuring that no development, excavation, paving, or trenching occurs within the TPZ**. This setback is reflected in the concept design submitted with this BAR and constitutes a mandatory constraint on future development within the site.

Civic node design iterations and library bulk motivation:

The design of the civic node underwent multiple iterations informed by engagement with the City's Community Services and Library Services departments, the findings of the Heritage Impact Assessment, and the City's objective of maximising the social and economic value of the site.

An initial layout option retained the existing civic buildings in their current form without modification or extension. This option was not taken forward as it did not address the identified functional constraints of the existing library and Minor Hall: the library lacks adequate space particularly in the children's section; the two halls cannot operate simultaneously due to acoustic conflicts; and the Minor Hall has limited visibility and accessibility. These constraints were confirmed through direct engagement with City library and community services staff.

The preferred civic node layout provides for a library extension connected to the existing building by a lightweight bridge, conversion of the Minor Hall to a kitchen/cafe to activate the public forecourt, repurposing of the library reading room as an activity room, and the provision of additional development bulk above the existing library footprint. This additional bulk is specifically motivated by the City's objective of maximising the value and utility of this publicly owned site, and by the prime coastal location which presents an opportunity for civic programming at upper levels with views over the promenade and sea.

The Heritage Impact Assessment (Malan and Postlethwayt, 2026) identifies that interventions involving vertical additions to the civic and library ensemble require a heightened degree of architectural sensitivity. **The HIA states that such additions may only be acceptable where: the retained civic buildings remain visually primary; additional bulk is clearly subordinate and recessive; rooftop accretion is avoided; architectural integration is highly resolved; and spatial openness and civic legibility are preserved.** The concept design is guided by these conditions. Further architectural development at Precinct Plan stage will require additional specialist input from heritage, structural, visual impact, and architectural consultants.

It is also noted that the Green Point Common was declared a Provincial Heritage Site in September 2024. This declaration, which occurred during the pre-statutory design process, was incorporated into the updated Heritage Impact Assessment and has been reflected in the concept design's approach to the interface between the site and the Common.

ECD / creche location alternatives:

An early layout option tested placement of an Early Childhood Development (ECD) facility beneath the existing eucalyptus trees on the eastern portion of the site. Various constraints were identified associated with that location, including the need for tree protection zones and road noise disturbance concerns, therefore this option was not taken forward.

The preferred layout relocates the ECD facility within the civic node cluster, providing a double-storey building with a secure outdoor play area. The dimensions of the new proposed location were benchmarked against the space requirements provided by the Pinocchio Creche. Positive opportunities are expected with the position of the ECD within the civic node, subject to adequate provision for parking and stop-and-drop. These requirements have been incorporated into the concept design parameters.

Provide a motivation for the preferred design or layout alternative.

The preferred design and layout alternative has been informed by a contextual analysis of the surrounding land uses and various specialists' inputs, including visual and heritage. The proposed

concept design has considered contextual massing and analysis of the surrounding building patterns along Green Point Main Road, Sea Point Main Road, and Beach Road. This has informed the proposed building massing, heights, arrangement, and edge conditions of the concept design. The site is of high value due to its prime location to the coast and City's CBD, and the proposed concept design is intended to maximise the development potential of the site to meet the City's economic and policy objectives pertaining to mixed-use infill developments, provision of residential space (including affordable housing), and meeting the needs of the surrounding community as well as tourism industry. The City intends to make the most efficient use of its land portfolio to support municipal infrastructure and service delivery needs across the metro. Notably, proposed concept design aligns with the City's planning policies in which the site has been earmarked for new development and civic use (2023 Table Bay District SDF).

There were various iterations of the design and layout of the civic node. These included the consideration of the best location for the crèche on the site. The pro's and con's of relocating the crèche were investigated by the project team and the proposed location represented the most feasible and appropriate option.

Other design or layout alternatives may include more bulk and therefore more residential or commercial space, but would then be at risk overlooking important heritage and visual aspects. Conversely, a smaller overall bulk may have reduced impacts (particularly visual) but would then be at risk of not meeting the residential and commercial needs of the surrounds. The proposed concept design takes consideration of the surrounding land uses and retail character, and prioritisation of the preservation and enhancement of the civic node on the site. The proposed preferred activity – the mixed-use development of the site – provides an opportunity for infill development, avoiding urban sprawl, enhancing connectivity with surrounding areas, integrating the site with the surrounding urban environment, and supporting the City's community and economic needs.

Indicators that informed the proposed concept design:

- Existing site conditions (infrastructure and use) and mobility network (proximity to NMT, public transport and parking availability)
- Existing civil and electrical services
- Heritage recommendations and informants (described below)

Figure 33: Heritage indicators (ACG architects)

1) Retain the library and civic centre buildings: Restore and upgrade this building to improve its functioning with sensitive adaption and additions (design subject to heritage, structural, visual impact and architectural specialist input at Precinct Plan stage, consistent with the conditions set out in the Heritage Impact Assessment).
2) Retain library and civic centre forecourt, restore and upgrade the landscaping and make it available as a public place again.
3) Allow for view lines through the site (north-south lanes between buildings)
4) Vary the height, scale and design of new buildings on the site (similar to development along Main Road). Ensure detailed articulation of new buildings. Monolithic massing should be avoided.
5) The interface of new buildings with Main Road to include active street frontages at ground level.
6) Screening of development with planting on Helen Suzman Boulevard to assist with traffic noise, visual amenity.
7) The mature Eucalyptus glade on site is to be retained due to its historical significance as part of the original tree-lined avenue, contributing to the site's character.

These informants and recommendations were incorporated into the proposed concept design which includes the retention and upgrade of the library and civic centre buildings and forecourt, north-south view lines, contextually appropriate massing, active street frontages and screening elements via soft landscaping. The eucalyptus tree line on the eastern side of the site has heritage significance and is also to be retained. Tree protection zones have informed the addition of an adequate setback from tree avenue along Main Road that is part of the Fan Walk, as well as eucalyptus tree glade on the eastern side of the site.

Opportunities identified and included:

- Enhancement of the NMT network: connection to the existing NMT route along Main Road, Helen Suzman Boulevard and Sea Point Promenade.

- Three potential forecourt areas were identified which could offer spatial identities and functions
- Extension of the existing retail frontage, activating the street edges
- Improved pedestrian connectivity linking to the Green Point recreational precinct
- Framing iconic views of the ocean, mountain and city skyline

The proposed concept design layout directly responds to these identified opportunities as exemplified by the proposed activation of the retail edge, landscaping and upgrade of forecourt areas, inclusion of green spaces, improved pedestrian connectivity via internal roadways, and incorporation of north-south view corridors (Figure 34).

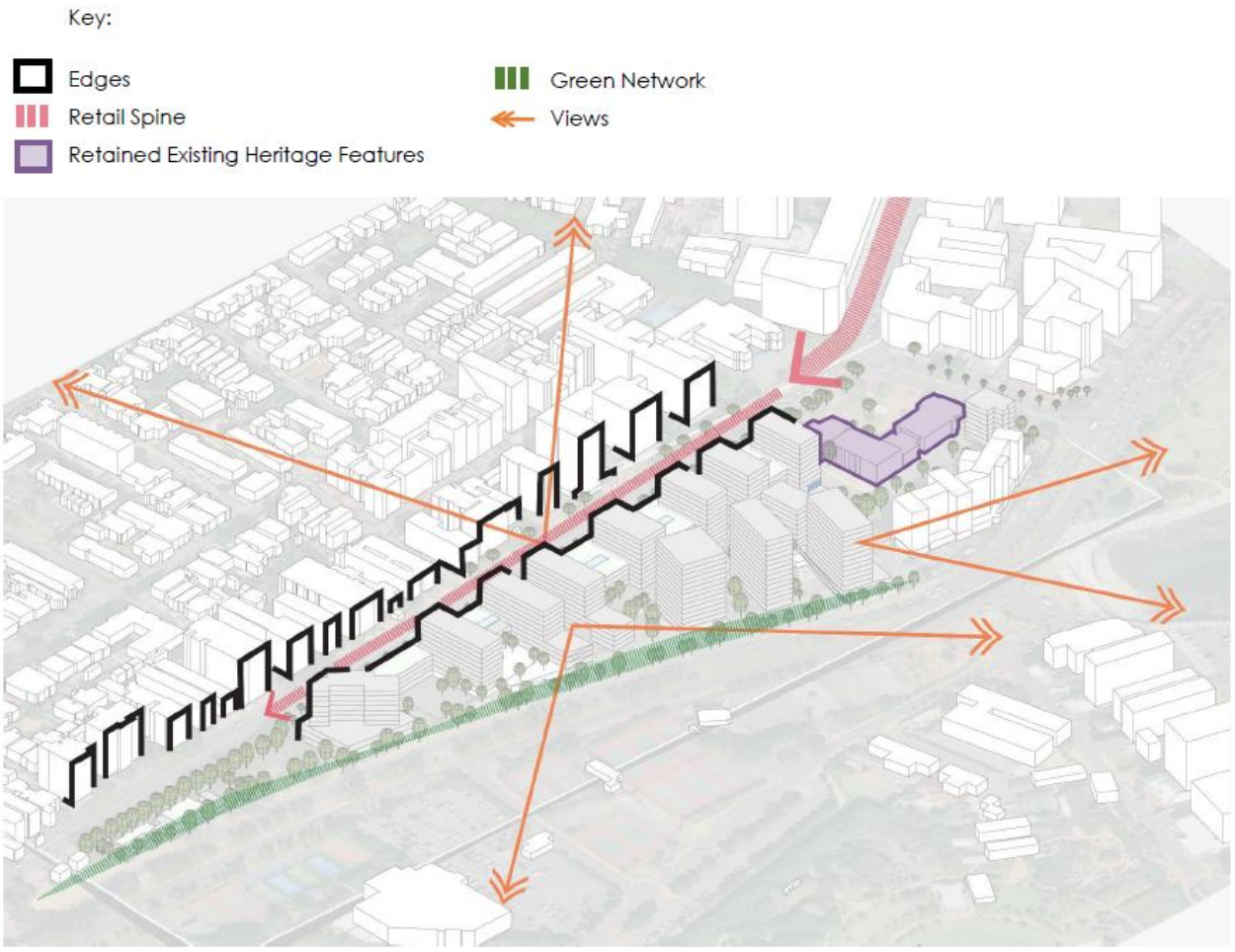


Figure 34: Response of the concept design to various design indicators and opportunities

The proposed concept design prioritises **integration and connectivity:**

- Relationship to the existing urban grain shaped the alignment of new streets and pathways, ensuring continuity with surrounding block patterns and reinforcing a coherent urban structure.
- Enhancement of the existing Fan Walk was achieved by introducing active frontages, diverse uses, and public interfaces that animate the pedestrian route and encourage engagement.
- New pedestrian and vehicular connections were introduced to improve permeability, providing multiple access points into and across the site to support ease of movement.
- Integration with larger pedestrian networks such as the promenade and urban park ensures seamless spatial connectivity, extending walkability and linking the development to key city landmarks and recreational spaces.

The proposed concept design also promotes **intensity, diversity and adaptability of uses:**

- Diversity of land uses is incorporated across the site to attract a wide range of users and create a vibrant, active environment throughout the day and night.
- Clustering of complementary land uses is strategically guided by site conditions and functional requirements to promote synergies between different activities.
- Defined clusters- civic, retail, and residential, are interconnected through a network of public spaces and linkages, ensuring seamless movement and mutual support between uses.
- Flexibility and adaptability are embedded in the development framework, allowing spaces to evolve over time and support multiple activities or changing community needs.

The people-centred designed creates comfortable human-scale environments, active building interfaces encouraging social interaction and safety. The mixed-use edges, pedestrian prioritisation and NMT create lively walkable environments and public spaces.

Provide a detailed motivation if no design or layout alternatives exist.

The proposed concept design provides a framework to guide future development. It establishes principles, structure, and parameters within which development on the site can occur. The concept has been informed by technical investigations, specialist input, public input received to date, and policy considerations. The proposed concept design aligns with spatial planning policies and frameworks, and responds to the increasing need for residential housing, preserves and enhances civic uses on the site, and includes retail and hotel offerings that would provide employment opportunities and benefit the economic sector. The proposed concept design has considered various indicators and specialist inputs, intending to maximise on opportunities identified (as described above) in an architecturally sensitive way such that the development benefits residents, the surrounding community and tourism. Therefore, due to the extensive and iterative concept design process, the preferred design and layout alternative is the only alternative considered.

List the positive and negative impacts that the design alternatives will have on the environment.

Positive Impacts:

- Amenity value – continuity with the main road interface and surrounding retail character
- Provision of residential space (including affordable housing) in close proximity to economic opportunities
- Contributions to the GDP and production in the local economy
- Household income generation
- Government revenue generation (City-level revenue from property taxes, as well as national-level revenue from corporate income tax paid businesses and personal income tax paid by employees)
- Job creation and skills development across a range of sectors, including retail, hospitality and facilities management
- Improved security (associated with improved use of an underutilised space)
- Retention and upgrade (where appropriate) to the civic node on site

Negative Impacts:

- Potential increase in traffic
- Construction-related impacts including noise, dust and vibration
- Visual impacts associated with the proposed building heights
- Loss of former green open space as a visual amenity

These impacts are discussed in detail in the impact tables provided at the end of this section.

1.4.	Technology alternatives (e.g., to reduce resource demand and increase resource use efficiency) to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred technology alternative:

No technology alternatives were proposed. Technology alternatives may be implemented during the construction phase.

Provide a description of any other technology alternatives investigated.

Technology alternatives are not relevant to the proposed development.

Provide a motivation for the preferred technology alternative.

No technology alternatives were proposed.

Provide a detailed motivation if no alternatives exist.

See responses above.

List the positive and negative impacts that the technology alternatives will have on the environment.

No impacts would apply as no technology alternatives are applicable.

1.5.	Operational alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts.

Provide a description of the preferred operational alternative.

The proposed concept design provides a framework and establishes principles, structure, and parameters within which future development can occur. The actual design of the site will be undertaken by the future developers of the site. The proposed development of the site for mixed-use aligns with the municipal and local frameworks, and responds directly to the increasing need for residential housing in and around the central business district. Therefore, the preferred operational alternative is one that aligns with the proposed concept design.

Provide a description of any other operational alternatives investigated.

Socio-economic economic modelling of two options

The Socio-economic Impact Assessment includes the modelling of two land use options, with Option 1 providing more residential units and Option 2 including more office space.

Land use type	Retail (GLA)	Office (GLA)	Hotel (GLA)	Community (GLA)	Open market residential units	Affordable residential units
Option 1	8 379 m²	1 403 m²	5 094 m²	1 355 m²	915	230
Option 2	8 379 m²	13 063 m²	5 094 m²	1 355 m²	772	183

Option 2 is the preferred operational option, according to which the impacts will be analysed. The differences in impact between Layout Options 1 and 2 for the proposed development are minor. The distinction between the two options is the greater residential unit allocation under Option 1, which has approximately 190 more residential units, while Option 2 has significantly more office space. This would create more benefit for housing availability under Option 1, which is a consideration from a socio-economic perspective. Conversely, the construction and operational

positive impacts on GDP, employment and household income are slightly higher under Option 2, due to the inclusion of more office space. Refer to the Socio-economic Impact Assessment for more details (**Appendix G3**).

Provide a motivation for the preferred operational alternative.

The preferred operational alternative is one that ultimately aligns with the proposed concept design.

Provide a detailed motivation if no alternatives exist.

See responses above.

List the positive and negative impacts that the operational alternatives will have on the environment.

Positive Impacts:

- Amenity value – continuity with the main road interface and surrounding retail character
- Provision of residential space (including affordable housing) in close proximity to economic opportunities
- Contributions to the GDP and production in the local economy
- Household income generation
- Government revenue generation (City-level revenue from property taxes, as well as national-level revenue from corporate income tax paid businesses and personal income tax paid by employees)
- Job creation and skills development across a range of sectors, including retail, hospitality and facilities management
- Improved security (associated with improved use of an underutilised space)
- Retention and upgrade (where appropriate) to the civic node on site

Negative Impacts:

- Potential increase in traffic
- Construction-related impacts including noise, dust and vibration
- Visual impacts associated with the proposed building heights
- Loss of former green open space as a visual amenity

These impacts are discussed in detail in the impact tables provided at the end of this section.

1.6.	The option of not implementing the activity (the 'No-Go' Option).

Provide an explanation as to why the 'No-Go' Option is not preferred.

The no-go alternative provides a baseline against which other alternatives have been compared to and considered during the EIA Phase. The no-go alternative assumes that the proposed project will not go ahead and is the status quo with minor to no changes. That would mean that the proposed mixed-use development would not occur on the site. There is an increasing need for residential space in the City, and the opportunity to use the proposed site to address this issue would be missed in the no-go alternative was implemented. Although this alternative would not result in various identified potential negative impacts on the site or surrounding local area, it would also limit the use of the site and would result in missed socio-economic benefits. The proposed retention and sensitive upgrade of the civic node on the site, preservation of historical eucalyptus tree glade and trees along Main Road, incorporation of pedestrian and green space networks, provision of residential space, employment opportunities and activation of a retail edge are all expected to have positive impacts on the development and local communities by creating continuity with the surrounding urban character and increasing use of the site. As stated in the

Socio-economic Impact Assessment, "the positive impacts of the proposed development are expected to outweigh the negative effects, the construction and operation of the project is preferred over the 'no-go' alternative."

The opportunity cost of the no-go alternative is particularly significant given the site's designation and its existing obligations. Erf 2187 is designated in the 2023 Table Bay District Spatial Development Framework for high-density mixed-use development and a civic cluster, and is a strategically located, publicly owned asset of 4.5 hectares within the metropolitan area. The no-go alternative would result in the continued underutilisation of this asset and the ongoing deterioration of the existing civic facilities, which are functionally constrained and require upgrading. It would also forgo the provision of much-needed residential units, including affordable housing, in an area experiencing significant housing pressure. The positive impacts of the proposed development, as assessed in the Socio-Economic Impact Assessment (Appendix G3), are expected to substantially outweigh the negative effects. The proposed development is therefore preferred over the no-go alternative.

1.7.	Provide an explanation as to whether any other alternatives to avoid negative impacts, mitigate unavoidable negative impacts and maximise positive impacts, or detailed motivation if no reasonable or feasible alternatives exist.

The preferred alternative is the product of an iterative, consultation-informed design process undertaken over more than a year prior to the submission of this BAR. It incorporates the outcomes of two rounds of pre-statutory public participation, multiple rounds of specialist assessment, and engagement with City of Cape Town line departments, and represents the design response that best balances the City's social, civic, economic, and heritage objectives for this publicly owned site.

1.8.	Provide a concluding statement indicating the preferred alternatives, including the preferred location of the activity.

The preferred alternative is the mixed-use development of the site (erf 2187) which is accessible and well-located within the metropolitan area. This preferred alternative was not predetermined but emerged from a substantive, iterative process of design refinement as documented in this section and the Pre-statutory Public Participation Report (Appendix F). The process included the consideration and rejection of alternative activities (including a Sky Train terminus), alternative layouts (including an unmodified civic node and alternative ECD placement), and alternative building envelopes, all of which were resolved prior to the commencement of this statutory Basic Assessment. The site is currently underutilised, and the proposed concept design seeks to maximise the development potential of the site. The proposed concept design provides a framework and establishes principles, structure, and parameters within which future development can occur. The proposed concept design:

- considers various specialists' inputs, responding to the identified informants and indicators where necessary (as described in Section I),
- aligns with the municipal and local frameworks, specifically meeting the objectives identified for the site in the TBDP in which the site is earmarked as a potential site for high density residential development, structuring open space and community civic cluster,
- responds directly to the increasing need for residential housing in and around the central business district by including market led affordable and middle- and high-income housing in a cross-subsidised model,
- retains and enhances valuable community services, namely the library, civic centre and crèche, on the site,

- retains the existing heritage resources on the site (library and civic centre complex and eucalyptus trees),
- creates continuity with the surrounding retail edge and surrounding retail character,
- includes a green network that builds on existing site conditions and environmental informants to establish a connected landscape framework that integrates the proposed development with its surrounding context, including the adjacent promenade.

1. "No-Go" areas

Explain what "no-go" area(s) have been identified during identification of the alternatives and provide the co-ordinates of the "no-go" area(s).

No environmentally sensitive no-go areas have been identified on the site. However, two physical constraints function as no-go areas for development purposes and have been incorporated into the concept design as mandatory development exclusion zones.

The first is the Tree Protection Zone (TPZ) established for the mature eucalyptus trees along the Helen Suzman Boulevard boundary on the eastern portion of the site as well as the trees along the Main Road. As determined by the Landscape Report (ACG Architects, 2026 - Appendix L5), a development setback of approximately 6 m (species and tree dependent) from the site boundary applies along the Main Road within which no development, excavation, paving, or trenching may occur. The trees are heritage resources of contextual significance and their TPZs extend partially beyond the cadastral boundary. Coordinates of the TPZ boundary are provided in Appendix L5.

2. Methodology to determine the significance ratings of the potential environmental impacts and risks associated with the alternatives.

Describe the methodology to be used in determining and ranking the nature, significance, consequences, extent, duration of the potential environmental impacts and risks associated with the proposed activity or development and alternatives, the degree to which the impact or risk can be reversed and the degree to which the impact and risk may cause irreplaceable loss of resources.

This section outlines the impact assessment methodology, based on the (then) Department of Environmental Affairs and Tourism (DEAT) 2006 Guideline on Assessment of Alternatives and Impacts.
Impacts are defined as the changes in an environmental parameter that result from undertaking an activity. The change is the difference between the effect on the environmental parameter where the activity is undertaken compared to that where the activity is not undertaken. Impacts occur over a specific period and within a defined area.

Due to the nature of the proposed concept design, the impacts are described in this report are separated into Construction and Post-Construction Phase. The Post-Construction Phase includes the impacts associated with the physical form of the development once construction has been completed (e.g. heritage and visual), as well as operational impacts anticipated with the operation of different elements of the concept design (e.g. traffic and commercial use). Impacts associated with the proposed concept design have been assessed as follows:

- Direct impacts are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity. These impacts are usually associated with the construction, operation or maintenance of an activity and are generally obvious and quantifiable.

- Indirect impacts of an activity are indirect or induced changes that may occur as a result of the activity. These types of impacts include all the potential impacts that do not manifest immediately when the activity is undertaken or which occur at a different place as a result of the activity.
- Cumulative impacts, in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to the existing and reasonably foreseeable impacts eventuating from similar or diverse activities.

In order to identify potential impacts (both positive and negative) the nature of the proposed projects is interrogated so that the impacts associated with the projects can be assessed. The process of identification and assessment of impacts included:

1. Determining the current environmental conditions in sufficient detail so that there is a baseline against which impacts can be identified and measured, including by:
    - Determination of site conditions via a visual inspection;
    - Review of recent and historical aerial imagery; and
    - Specialist assessments as required.
2. Determining future changes to the environment that will occur if the activity does not proceed, based on knowledge of local conditions, trends, and processes and on specialist assessment;
3. Developing an understanding of the activity in sufficient detail to understand its consequences; and
4. The determination of significant impacts which are likely to occur if the activity is undertaken.

As per the DEAT Guideline the following criteria have been applied to the prediction and assessment of impacts. Potential impacts are rated in terms of their:

- **Spatial extent** – The size of the area that will be affected by the impact:
    - Immediate (site only);
    - Local (<2 km from site);
    - Regional (within 30 km of site);
    - National; or
    - International.

- **Intensity** – The anticipated severity of the impact:
    - High (severe alteration of natural systems, patterns or processes);
    - Medium (notable alteration of natural systems, patterns or processes); or
    - Low (negligible alteration of natural systems, patterns or processes).

- **Duration** – The timeframe during which the impact will be experienced:
    - Temporary (less than 1 year);
    - Short-term (1 to 6 years);
    - Medium-term (6 to 15 years);
    - Long-term (the impact will cease after the operational life of the activity); or
    - Permanent (reversal will not occur in such a way or in such a time span that the impact can be considered transient).

- **Reversibility** – The extent to which the impacts will be reversible when the project has reached the end of its life cycle (decommissioning phase, if applicable):
    - High reversibility of impacts (impact is highly reversible at end of project life);
    - Moderate reversibility of impacts;
    - Low reversibility of impacts; or
    - Impacts are non-reversible (impact is permanent).

- **Irreplaceability of resources lost** – the degree to which the impact causes irreplaceable loss of resources:
    - High irreplaceability of resources (project will destroy unique resources that cannot be replaced);
    - Moderate irreplaceability of resources;
    - Low irreplaceability of resources; or
    - Resources are replaceable (the affected resource is easy to replace/rehabilitate).

Using the criteria above, the impacts are further assessed in terms of the following:

- **Probability –** The probability of the impact occurring:
    - Improbable (little to no chance of occurring);
    - Probable (<50% chance of occurring)
    - Highly probable (50 - 90% chance of occurring)
    - Definite (>90% chance of occurring)

- **Significance** – Will the impact cause a notable alteration of the environment?
    - Low to very low (the impact may result in minor alterations of the environment and can be easily avoided by implementing appropriate mitigation measures, and will not have an influence on decision-making);
    - Medium (the impact will result in moderate alteration of the environment and can be reduced or avoided by implementing the appropriate mitigation measures, and will only have an influence on the decision-making if not mitigated); or
    - High (the impacts will result in major alteration to the environment even with the implementation on the appropriate mitigation measures and will have an influence on decision-making).

- **Status** - Whether the impact on the overall environment will be:
    - Positive - environment will benefit from the impact;
    - Negative - environment will be adversely affected by the impact; or
    - Neutral - environment will not be affected.

- **Confidence** – The degree of confidence in predictions based on available information and specialist knowledge:
    - Low;
    - Medium; or
    - High.

Impact mitigation measures have been incorporated into the EMPr, which includes where appropriate:

- Standards for measuring and monitoring mitigatory measures and enhancements, and a programme for monitoring and reviewing the recommendations to ensure their ongoing effectiveness; and
- Mitigation and management measures to avoid or reduce negative impacts.

Other aspects taken into consideration in the assessment of impact significance are:

- Impacts are evaluated for the construction and operation phases of the development.
- Impacts are evaluated with and without mitigation, stating the effectiveness of mitigation measures to reduce the significance of a particular impact;
- The impact evaluation takes into consideration the cumulative effects associated with this and other projects which are either developed or in the process of being developed in the local area; and

- The impact assessment attempts to quantify the magnitude of potential impacts (direct and cumulative) and outline the rationale used. Where appropriate, national standards are used as a measure of the level of impact.

Note that, where possible, the rationale for each rating has been provided and a short narration of each impact is provided above each table which describes and contextualises the impact. The methodology used for the Visual Impact Assessment is described in more detail in the section below and in the VIA (Appendix G2).

ASSESSMENT OF EACH IMPACT AND RISK IDENTIFIED FOR EACH ALTERNATIVE

Note: The following table serves as a guide for summarising each alternative. The table should be repeated for each alternative to ensure a comparative assessment. The EAP may decide to include this section as Appendix J to this BAR.

Due to the nature of the proposed concept design, which includes residential, retail, commercial, civic and green spaces, the impacts described in this report are separated into Construction and Post-Construction Phase. The Post-Construction Phase includes the impacts associated with the physical form of the development once construction has been completed (e.g. heritage and visual), as well as operational impacts anticipated with the operation of different elements of the concept design (e.g. traffic and socio-economic). The Construction Phase impacts are associated with any construction-related activities.

1.1 Construction Phase

There are various anticipated impacts associated with construction-related activities, including transport, noise, vibration, dust, visual, and employment. The impacts that occur during the construction phase are of a temporary nature and therefore have a temporary impact.

1.1.1 Transport impacts

*Information extracted from the Transport Impact Assessment (**Appendix G4**) and supplemented by EAP recommendations*

Construction-related transport impacts are anticipated associated with heavy vehicles and other construction traffic accessing and leaving the site via Helen Suzman, Main Road and the wider road network. These impacts include increased traffic in the surrounding area and restricted access to the site. This is likely to be particularly significant during the bulk earthworks phase of the development when unsuitable fill material is removed from the site and basements are constructed. A temporary reduction in available parking is anticipated, including the (formal) parking on the site itself and the (informal) parallel parking along Helen Suzman and Main Road. Additionally, the existing pedestrian network (such as the existing sidewalks) may be temporarily inaccessible during construction.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
CONSTRUCTION PHASE		
Potential impact and risk:	**TRANSPORT IMPACTS**	
Nature of impact:	Negative	No construction phase traffic impacts are expected for the no-development alternative.
Extent and duration of impact:	Local and short-term (for the duration of the construction phase)	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TRANSPORT IMPACTS**	
Consequence of impact or risk:	Increased traffic in the surrounding area and disruption to the existing pedestrian network, as well as potential delays in commuter traffic and increased travel times.	None
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Highly reversible: traffic-related impacts are temporary in nature and will subside once construction activities are completed.	Not applicable
Indirect impacts:	None anticipated	Not applicable
Cumulative impact **prior** to mitigation:	Medium negative	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative	Not applicable
Degree to which the impact can be avoided:	Low: construction-related transport impacts cannot be entirely avoided, as they are inherently linked to the movement of materials, equipment, and personnel during the construction phase.	Not applicable
Degree to which the impact can be managed:	Moderate: with appropriate monitoring, mitigation and traffic management, construction-related traffic impacts can be reasonably managed. However, some construction traffic impacts are unavoidable.	Not applicable
Degree to which the impact can be mitigated:	Moderate: a range of traffic management and mitigation measures can be implemented to reduce and manage traffic-related construction impacts (see Appendix H for further details).	Not applicable
Proposed mitigation:	Implementation of a traffic management plan (to be included in the Method Statements compiled by the relevant contractor), which may include the selection of appropriate routes and access for heavy vehicles, scheduling deliveries outside of peak traffic periods, the use of detours and alternative routes as required, and the use of flag persons to direct traffic around obstructions.	Not applicable
Residual impacts:	Some construction-related traffic is inevitable during the construction phase, but the implementation of management and mitigation as set out in the EMPr (and Methods Statements to be compiled at a later stage) will ensure that residual impacts are low and limited to normal working hours.	Not applicable
Cumulative impact **post** mitigation:	Low: no cumulative impacts	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TRANSPORT IMPACTS**	
Significance rating of impact **after** mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative	None

1.1.2 Noise and vibration impacts

*Information extracted from the Socio-Economic Impact Assessment (**Appendix G3**) and supplemented by EAP recommendations.*

Noise and vibration are to be expected during the construction of the proposed development. Noise will likely be generated by construction machinery and equipment, while vibration is likely during bulk earthworks, demolition of structures and installation of pile foundations. These factors will affect visitors to the surrounding area, as well as the residents adjacent to the site. This includes residents of the CPOA and those living along Main Road. While this activity is unavoidable, implementing the identified mitigation measures can reduce the impacts.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**NOISE AND VIBRATION IMPACTS**	
Nature of impact:	Negative	None
Extent and duration of impact:	Local, short-term (for the duration of the construction phase)	Not applicable
Consequence of impact or risk:	Medium-high: Noise nuisance and vibration experienced by neighbouring residents and businesses.	None
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Low: No loss of resources	Not applicable
Degree to which the impact can be reversed:	Fully reversible: Once construction has been completed, there will be no further noise and vibration disturbance.	Not applicable
Indirect impacts:	No indirect impacts	Not applicable
Cumulative impact **prior** to mitigation:	Medium negative	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high negative	Not applicable
Degree to which the impact can be avoided:	Unavoidable: noise and vibration cannot be avoided during the construction of the proposed development as they are inevitable, particularly during activities like excavation, piling and the operation of heavy machinery.	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**NOISE AND VIBRATION IMPACTS**	
Degree to which the impact can be managed:	Medium: construction-related noise and vibration impacts can be reduced to acceptable through ongoing monitoring and the implementation of appropriate mitigation measures, although they cannot be entirely eliminated (refer to Appendix H – EMPr for further detail).	Not applicable
Degree to which the impact can be mitigated:	Medium: there are various mitigation measures that can be effectively implemented to reduce noise and vibration disturbances, as described below.	Not applicable
Proposed mitigation:	Proposed noise management measures are described in detail in the EMPr, and include but are not limited to: • Compliance with policies regarding noise and vibration regulation methods close to roads and residential areas. • Restriction of working hours during weekdays in line with municipal and provincial requirements. • Use of machinery in good working order. • No amplified music on site. • Machinery to be fitted with silencers when noise levels are excessively high on site. • Maintaining complaints register on site	Not applicable
Residual impacts:	Low: Through the implementation of management and mitigation measures as set out in the EMPr, will ensure that residual impacts are low and limited to normal working hours. Ensuring that they remain temporary (during the construction phase), localised and within acceptable levels.	Not applicable
Cumulative impact post mitigation:	Low negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative	None

1.1.3 Dust and air pollution impacts

*Information extracted from the Socio-Economic Impact Assessment (**Appendix G3**) and supplemented by EAP recommendations.*

During construction there may be some dust generation associated with construction activities on the site, including the demolition of existing infrastructure, transport and storage of building materials (including stockpiles), and construction of new development. This impact is expected to be short-term, limited in extent to the site and immediate surrounds. Dust generation can pose a nuisance to neighbours and surrounding land users, but the impact can be adequately mitigated and managed.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
CONSTRUCTION PHASE		
Potential impact and risk:	**DUST AND AIR POLLUTION IMPACTS**	
Nature of impact:	Negative	None
Extent and duration of impact:	Local, short-term (for the duration of the construction phase)	Not applicable
Consequence of impact or risk:	Medium-high negative: Discomfort from dust plumes, nuisance to neighbours and surrounding land users	None
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No irreplaceable loss of resources is associated with dust impacts	Not applicable
Degree to which the impact can be reversed:	Fully reversible: dust can be cleaned off surfaces and is not usually associated with any irreversible effects	Not applicable
Indirect impacts:	Medium: potential reduced visibility and dust accumulation on adjacent buildings if no mitigation measures are implemented	Not applicable
Cumulative impact **prior** to mitigation:	Medium negative	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high negative	Not applicable
Degree to which the impact can be avoided:	Low: dust generation during construction is largely unavoidable since it is inherent to activities such as demolition, excavation and the movement of vehicle and materials.	Not applicable
Degree to which the impact can be managed:	Medium: ECO can monitor for compliance, but wind direction and speeds can be unpredictable	Not applicable
Degree to which the impact can be mitigated:	Low: there are various dust-mitigation measures that can be implemented to mitigate dust impacts (see below)	Not applicable
Proposed mitigation:	Implementation of management measures as set out in the construction EMPr, which include dust suppression measures. Other mitigation measures include: • Compliance with the National Dust Control Regulations (GN No. R827 of 1 November 2013), promulgated in terms of the National Environmental	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**DUST AND AIR POLLUTION IMPACTS**	
	Management: Air Quality Act, 2004 (Act No. 39 of 2004) by ensuring that construction activity does not produce dust more than stipulated thresholds to the detriment of the environment and human health. • Restriction of working hours during weekdays in line with municipal and provincial requirements. • The use of non-potable water for dust stabilisation. • Stockpiles of sand and stone must be effectively stabilised and must be covered or sealed if dust generation is apparent. • Excavation, handling, and transportation of erodible materials must be avoided under high wind conditions. • The compiling of a Dust Method Statement to be reviewed by the ECO. Refer to the EMPr (Appendix H) for more details.	
Residual impacts:	Low: Possible dust nuisance to residents and users of the surrounding area for short periods during high wind conditions.	Not applicable
Cumulative impact post mitigation:	Low negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative	None

1.1.4 Socio-economic Impacts

The following potential socio-economic impacts for the construction phase of the proposed mixed-use development has been identified, as per the socio-economic impact assessment (Urban Econ, 2026 – **Appendix G3**):

1.1.4.1 Impact on production and GDP
1.1.4.2 Impact on employment
1.1.4.3 Impact on household income
1.1.4.4 Impact on government revenue
1.1.4.5 Impact on skills development
1.1.4.6 Impact on traffic congestion (from a socio-economic perspective)
1.1.4.7 Impact on sense of place (visual)
1.1.4.8 Impact on access to civic facilities and services
1.1.4.9 Impact on ECD centre

1.1.4.1 Impact on production and GDP

The construction phase of the proposed development will have a significant impact on production and GDP in the local economy. The direct impact of the development of the preferred alternative on production is expected to be approximately R3.7 billion. As indicated by the SAM modelling (Section 5), these direct impacts will stimulate further economic activity, thus creating additional contributions to GDP and production through indirect and induced impacts. The construction phase of the proposed development will thus generate a total GDP contribution of R3.3 billion. Under the no-go alternative, no economic activity is created, thus there is no impact on GDP and production.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON GDP & PRODUCTION**	
Nature of impact:	Positive	None
Extent and duration of impact:	Regional and short term (for the duration of the construction of the proposed development)	Not applicable
Consequence of impact or risk:	Temporary stimulation of business production and GDP through construction expenditure.	The no-go alternative entails an opportunity cost, as it forgoes potential contributions to local production and GDP.
Probability of occurrence:	Definite	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	The direct stimulation of economic activity will positively impact household incomes and could create further employment opportunities in the local economy.	Not applicable
Cumulative impact **prior** to mitigation:	Medium-high positive	Not applicable
Significance rating of impact **prior to enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high positive	Not applicable
Degree to which the impact can be avoided:	Not applicable	Not applicable
Degree to which the impact can be managed:	Not applicable	Not applicable
Degree to which the impact can be mitigated:	Not applicable	Not applicable
Proposed mitigation:	No mitigation required – positive impact	Not applicable
Degree to which the impact can be enhanced:	High	Not applicable
Proposed enhancement:	• The developer should encourage the contractor to utilise labour from surrounding communities to maximise the benefit to the local economy.	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON GDP & PRODUCTION**	
	• The developer should encourage the contractor to procure construction materials from local suppliers where feasible.	
Residual impacts:	None	Not applicable
Cumulative impact **post enhancement:**	High positive	Not applicable
Significance rating of impact **after enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	High positive	None

1.1.4.2 Impact on employment

The construction of the proposed development will create temporary employment during the construction phase, where contractors, sub-contractors and professional staff will be employed. Additionally, the capital expenditure of the construction phase may create further employment opportunities through indirect and induced impacts, in sectors such as transport, retail and manufacturing.

Based on the Social Accounting Matrix (SAM) modelling, it is estimated that approximately 2 352 direct employment opportunities would be generated under the preferred option. When accounting for indirect and induced effects across supplier industries and household expenditure, the total employment impact associated with the proposed concept design increases to **9 789 full-time equivalent (FTE) jobs**.

Indirect employment effects are expected to be concentrated in sectors such as:

- Building materials manufacturing and supply chains
- Transport and logistics (movement of materials to site)
- Wholesale and retail trade (equipment and inputs)
- Business services linked to construction and development

Induced impacts will arise through increased household income and expenditure, particularly within the City of Cape Town, supporting sectors such as retail, food services and local services. Employment opportunities will span multiple skill levels; while the majority of the jobs will be low-to semi-skilled construction roles, the scale, complexity and location of the development particularly given the inclusion of residential, commercial and hotel components will also require high-skilled professionals, including engineers, project managers, architects and specialist contractors. Although these employment opportunities are temporary and primarily associated with the construction phase of the proposed development, the scale of the investment and the number of jobs created provide a significant short-term boost to income generation, particularly within the metropolitan economy. Furthermore, the project provides opportunities for skills utilisation, enterprise participation (SMMEs) and potential opportunities into longer-term employment within the construction and property sectors.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY EMPLOYMENT CREATION**	
Nature of impact:	Positive	None
Extent and duration of impact:	Regional and short term (for the duration of the construction of the proposed development)	Not applicable
Consequence of impact or risk:	High: The project's construction will positively impact the local and broader community by creating several temporary job opportunities thereby increasing income into affected households.	The no-go alternative results in an opportunity cost in terms of foregone job creation opportunities.
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	Indirect employment creation is anticipated in the materials, manufacturing and transport sectors. Additionally, temporary employment can boost short-term financial wellbeing and provide an entry point to longer-term job opportunities.	Not applicable
Cumulative impact **prior** to mitigation:	Medium positive	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	Not applicable
Degree to which the impact can be avoided:	Not applicable	Not applicable
Degree to which the impact can be managed:	Not applicable	Not applicable
Degree to which the impact can be mitigated:	Not applicable	Not applicable
Proposed mitigation:	No mitigation required – positive impact	Not applicable
Degree to which the impact can be enhanced:	High	Not applicable
Proposed enhancement:	• Prioritise labour sourcing from the broader Cape Town, including historically disadvantaged areas with high unemployment like the Cape Flats • Sub-contractors should be local SMMEs and BBBEE compliant enterprises • Employ labour-intensive construction methods where feasible	Not applicable
Residual impacts:	None	Not applicable
Cumulative impact **post enhancement:**	High positive	Not applicable
Significance rating of impact **after enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high positive	None

1.1.4.3 Impact on household income

The creation of employment opportunities during the construction phase as well as the new business activity for suppliers will generate household income through wages earned by construction workers, payments to contractors and sub-contractors and expenditure across supporting industries.

Based on the SAM model, the development as shown in the proposed concept design is expected to generate a total of R1.5 billion in household income. This income is distributed across direct, indirect and induced channels, indicating the broader economic linkages associated with large-scale construction activities.

A large proportion of household income will accrue to:

- Construction workers and artisans employed directly on site
- Employees within supplier industries, including materials, transport and logistics
- SMMEs and subcontractors participating in the construction value chain

Although temporary, the increase in household income will positively impact the living standards of the affected households. This can have positive effects on nutrition, healthcare, education and general economic wellbeing.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON HOUSEHOLD INCOME**	
Nature of impact:	Positive	None
Extent and duration of impact:	Regional and short term (for the duration of the construction of the proposed development)	Not applicable
Consequence of impact or risk:	High: Temporary increase in household income due to construction employment and supplier spend.	The no-go alternative results in an opportunity cost by foregoing development on a suitable and well-located site.
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	Increased household income can result in increased household spending, which further stimulates the local economy	Not applicable
Cumulative impact **prior to enhancement:**	Medium positive	Not applicable
Significance rating of impact **prior to enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON HOUSEHOLD INCOME**	
Degree to which the impact can be avoided:	Not applicable	Not applicable
Degree to which the impact can be managed:	Not applicable	Not applicable
Degree to which the impact can be mitigated:	Not applicable	Not applicable
Proposed mitigation:	No mitigation required – positive impact	Not applicable
Degree to which the impact can be enhanced:	Moderate	Not applicable
Proposed enhancement:	• Prioritise labour sourcing from the broader Cape Town, including historically disadvantaged areas with high unemployment like the Cape Flats • Labour-intensive construction methods should be utilised where possible • Supplies should be procured from local SMMEs where possible	Not applicable
Residual impacts:	None	Not applicable
Cumulative impact **post enhancement:**	High positive	Not applicable
Significance rating of impact **after enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high positive	None

1.1.4.4 Impact on government revenue

The construction phase of the proposed development will contribute to additional government revenue across multiple spheres of government, with the most direct and immediate impacts occurring at the municipal level, and broader fiscal contributions accruing at the national level. Revenue will also be generated through personal income tax from construction workers, corporate income tax from developers, contractors and suppliers and value added tax (VAT) associated with goods and services procured during both phases. These revenue contributions will assist in funding infrastructure expansion and maintenance in the local area and the broader region.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON GOVERNMENT REVENUE**	
Nature of impact:	Positive	None
Extent and duration of impact:	National and short term (for the duration of the construction of the proposed development)	Not applicable
Consequence of impact or risk:	Moderate: Temporary increase in government revenue through construction charges, property taxes and income taxes.	The no-go alternative results in an opportunity cost by foregoing development on a suitable and well-located site.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON GOVERNMENT REVENUE**	
Probability of occurrence:	Probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	Short-term public revenue gains can help fund immediate municipal needs such as basic services and infrastructure upgrades	Not applicable
Cumulative impact **prior to enhancement:**	Medium positive	Not applicable
Significance rating of impact **prior to enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	Not applicable
Degree to which the impact can be avoided:	Not applicable	Not applicable
Degree to which the impact can be managed:	Not applicable	Not applicable
Degree to which the impact can be mitigated:	Not applicable	Not applicable
Proposed mitigation:	No mitigation required – positive impact	Not applicable
Degree to which the impact can be enhanced:	Low	Not applicable
Proposed enhancement:	Not applicable	Not applicable
Residual impacts:	None	Not applicable
Cumulative impact **post enhancement:**	Medium positive	Not applicable
Significance rating of impact **after enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high positive	None

1.1.4.5 Impact on skills development

The construction phase of the proposed development will create opportunities for on-site skills development and experiential learning within the construction and built environment sectors. Given the scale, complexity and mixed-use nature of the development, incorporating residential commercial, retail and hotel components, the project will require a range of technical, artisanal and professional skills. This creates opportunities for both skills' utilisation and limited skills transfer across multiple areas, including basic and semi-skilled construction activities like bricklaying, concrete work, tiling and general labour; technical and artisanal trades (e.g., plumbing, electrical work, carpentry and mechanical installations), as well as specialised construction techniques associated with high-density developments (e.g., reinforced concreate structures, formwork systems, basement construction

and multi-storey building methods). In addition, workers will gain exposure to site-based operational and compliance requirements, including occupational health and safety (OHS), as well as elements of project coordination and supervision.

For lower and semi-skilled workers, particularly youth and individuals from historically disadvantaged backgrounds within the Cape Town labour market, participation in the project can provide valuable practical work experience and improved employability within the construction sector. While the impact is positive, it remains secondary to employment and income impacts and is dependent on procurement and labour practices. The skills and experience gained are non-reversible and contribute to longer-term human capital development, with potential benefits extending beyond the construction phase through improved access to future employment opportunities.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON SKILLS DEVELOPMENT**	
Nature of impact:	Positive	None
Extent and duration of impact:	Regional and short term (for the duration of the construction of the proposed development)	Not applicable
Consequence of impact or risk:	Low: Temporary opportunity for skills development and on-site training, across construction, technical and site management activities.	The no-go alternative results in an opportunity cost by foregoing development on a suitable and well-located site.
Probability of occurrence:	Probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	Skills development enhances employability by providing work experience and training in relevant skills, which can have a positive impact on income for workers	Not applicable
Cumulative impact **prior to enhancement:**	Low positive	Not applicable
Significance rating of impact **prior to enhancement (**e.g. Low, Medium, Medium-High, High, or Very-High)	Low positive	Not applicable
Degree to which the impact can be avoided:	Not applicable	Not applicable
Degree to which the impact can be managed:	Not applicable	Not applicable
Degree to which the impact can be mitigated:	Not applicable	Not applicable
Proposed mitigation:	No mitigation required – positive impact	Not applicable
Degree to which the impact can be enhanced:	Medium	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON SKILLS DEVELOPMENT**	
Proposed enhancement:	• Contractors should employ workers from surrounding communities where feasible, to enhance local economic impact • Labour-intensive construction methods should be utilised where possible • Prioritise employment of youth and entry-level workers to support skills pipeline development.	Not applicable
Residual impacts:	None	Not applicable
Cumulative impact post mitigation:	Medium	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	None

1.1.4.6 Impact on traffic congestion (from a socio-economic perspective)

The construction phase of the proposed development will generate additional traffic associated with construction vehicles, delivery trucks and worker movements. These trips will primarily utilise Helen Suzman Boulevard (M6) and Main Road (M61), which function as key arterial routes linking the Atlantic Seaboard with the Cape Town CBD and surrounding economic nodes. Given the existing role of these corridors within the metropolitan road network, the introduction of construction-related traffic particularly heavy vehicles is likely to result in temporary congestion, increased delays and localised disruptions to traffic flow, especially during peak periods.

From a socio-economic perspective, increased congestion will lead to higher travel times and costs for commuters, including workers travelling between residential areas and employment nodes such as the CBD, Green Point and Sea Point. This may also affect public transport reliability, given the shared use of these corridors by buses and minibus taxis. Temporary disruptions may also impact local businesses and service providers through reduced accessibility, as well as affect pedestrians and non-motorised users due to increased construction activity and vehicle movements. While these impacts are expected to be short-term and reversible, they are of particular concern given the high-traffic nature and economic importance of the surrounding network. Effective traffic management and construction-logistics planning will therefore be critical in minimising these impacts.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON TRAFFIC CONGESTION**	
Nature of impact:	Negative	None
Extent and duration of impact:	Local and short term (for the duration of the construction of the proposed development)	Not applicable
Consequence of impact or risk:	High: Increased construction-related traffic (including heavy vehicles) on key arterial routes (Helen Suzman Boulevard and Main Road), leading to congestion and disruption of traffic flow.	The absence of construction activities means that no additional construction-related

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON TRAFFIC CONGESTION**	
		traffic (particularly heavy vehicles) would be introduced onto Helen Suzman Boulevard or Main Road.
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Low	Not applicable
Degree to which the impact can be reversed:	Fully reversible	Not applicable
Indirect impacts:	Increased travel costs and time for commuters, reduced reliability of public transport, potential short-term impacts on local business accessibility, impacts on pedestrian safety and movement	Not applicable
Cumulative impact **prior** to mitigation:	High negative	Not applicable
Significance rating of impact **prior** to mitigation **(**e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high negative	Not applicable
Degree to which the impact can be avoided:	Low: construction-related traffic can be reduced through traffic management plans; however, some construction traffic impacts are unavoidable.	Not applicable
Degree to which the impact can be managed:	Medium-high: with appropriate monitoring, mitigation and traffic management, construction-related traffic impacts can be moderately managed.	Not applicable
Degree to which the impact can be mitigated:	Medium-high: a range of traffic management and mitigation measures (i.e., clearly defined access routes) can be implemented to reduce and manage traffic-related construction impacts (see below).	Not applicable
Proposed mitigation:	• Implement a Construction Traffic Management Plan (CTMP) aligned with TIA recommendations • Restrict movement of construction vehicles to off-peak hours • Provide clear pedestrian management and safety measures around the site	Not applicable
Residual impacts:	Medium: Some construction-related traffic is inevitable	Not applicable
Cumulative impact post mitigation:	Medium negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative	None

1.1.4.7 Impact on sense of place (visual)

*Extracted from the Socio-Economic Impact Assessment (**Appendix G3**) with additional mitigation measures recommended by the EAP*

The construction of the proposed development will create a temporary disturbance to visual sense of place, due to site establishment activities, earthworks, erection of cranes and scaffolding, temporary lighting, stockpiling of materials and increased construction-related traffic. This site is visible from the adjoining roads, the adjacent CPOA building, as well as residences located along Main Road. Although the visual disturbances will be noticeable to residents, visitors and passers-by, they are temporary in nature and will cease upon completion of the construction phase.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON SENSE OF PLACE (VISUAL)**	
Nature of impact:	Negative	None
Extent and duration of impact:	Local and short term (for the duration of the construction of the proposed development)	Not applicable
Consequence of impact or risk:	Medium: Temporary visual disturbance due to construction activities impacting sense of place, visual amenity and scenic quality	Not applicable
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Low	Not applicable
Degree to which the impact can be reversed:	Fully reversible: Visual impacts are temporary in nature and confined to the construction phase. Once construction activities crease and the development is completed, any visual disturbance like the presence of machinery, materials and temporary structures will be removed.	Not applicable
Indirect impacts:	Temporary reduction in visual amenity may affect visitor experience, pedestrian comfort and surrounding residents	Not applicable
Cumulative impact **prior** to mitigation:	Medium negative	Not applicable
Significance rating of impact **prior** to mitigation **(**e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative	Not applicable
Degree to which the impact can be avoided:	Low: visual impacts during the construction phase are unavoidable, due to the presence of machinery, materials and temporary construction structures on site.	Not applicable
Degree to which the impact can be managed:	Low: the extent and impact significance of aesthetic visual impacts during the construction phase can be effectively managed through good site management practices like screening, orderly storage of materials and minimising site clutter.	Not applicable
Degree to which the impact can be mitigated:	Low: can be mitigated, as described below.	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON SENSE OF PLACE (VISUAL)**	
Proposed mitigation:	• Compliance with standard construction management practices (including site housekeeping, material storage control and appropriate screening where required) The EMPr (Appendix H) includes mitigation measures for the construction phase, including visual screening of the site and these measures include: • Screen site camps and laydown areas with shade cloth or similar, where possible and appropriate. • Managing stockpile and laydown areas for cleanliness and appearance. • Restricting he activities and movement of construction workers and vehicles to the immediate construction site. Refer to Appendix H for more detailed mitigation measures.	Not applicable
Residual impacts:	Medium : Some impact on sense of place is inevitable during construction	Not applicable
Cumulative impact post mitigation:	Low negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative	None

1.1.4.8 Impact on access to civic facilities and services

The proposed development includes the retention and upgrade of the Colin Eglin Library and Sea Point Civic Centre, ensuring that the site continues to serve an important civic function within the Three Anchor Bay and broader Atlantic Seaboard area. While the long-term impact is positive, the construction phase is expected to result in temporary disruptions to access and use of these facilities due to refurbishment works, extensions and general construction activity on the site.

During the construction period, access to the library and civic centre may be partially constrained, with the potential for reduced operating capacity, temporary service interruptions or short-term closures of specific sections of the facility. These disruptions will affect a range of users, including students, job seekers, elderly residents, and community groups who rely on the facility for access to information, digital resources, study space and social programmes. Given the limited availability of equivalent civic facilities within the immediate area, any reduction in access may result in inconvenience and the need for users to travel further to access similar services. However, these temporary impacts are expected to be short-term and fully reversible. The implementation of phased construction, operational management measures and where necessary, temporary alternative service arrangements will assist in maintaining continuity of access to civic services during the construction period. Upon completion, the upgraded facilities are expected to enhance the quality, functionality and accessibility of civic services on the site.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON ACCESS TO CIVIC FACILITIES & SERVICES**	
Nature of impact:	Negative	None
Extent and duration of impact:	Local and short term (for the duration of the construction of the proposed development)	Not applicable
Consequence of impact or risk:	High: Temporary disruption to civic activity on the site (use of the library and civic centre) during construction and upgrades	The no-go alternative results in an opportunity cost by foregoing development on a suitable and well-located site.
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Low	Not applicable
Degree to which the impact can be reversed:	Fully reversible	Not applicable
Indirect impacts:	Reduced access to library and civic services will affect users and cause potential inconvenience and displacement of users to more distant facilities	Not applicable
Cumulative impact **prior** to mitigation:	High negative	Not applicable
Significance rating of impact **prior** to mitigation **(**e.g. Low, Medium, Medium-High, High, or Very-High)	High negative	Not applicable
Degree to which the impact can be avoided:	Unavoidable: Some disruption to the civic facilities is inevitable during the construction phase	Not applicable
Degree to which the impact can be managed:	Medium: Via a phased implementation of construction activities and careful oversight by the contractor	Not applicable
Degree to which the impact can be mitigated:	Moderate: See proposed mitigation measures below	Not applicable
Proposed mitigation:	• Implement phased construction such that portions of the library can remain open and usable insofar as is feasible and safe • Development and implementation of a management plan to manage and reduce impacts where possible • Communicate clearly with users regarding access, closures and alternative arrangements	Not applicable
Residual impacts:	Low:	Not applicable
Cumulative impact post mitigation:	Medium negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative	None

1.1.4.9 Impact on ECD centre

The proposed development will require the demolition of the building currently occupied by the Pinocchio Crèche, which will result in a temporary disruption to the operation of an established ECD facility on the site. The crèche has been operating in the area for over 40 years and plays an important role in providing accessible and relatively affordable childcare services to working households in Sea Point, Green Point and surrounding areas. It currently accommodates approximately 87 children and is characterised by high demand, strong community integration and linkages with nearby facilities such as the public library.

In the absence of confirmed interim arrangements, construction activities may result in a temporary cessation of ECD services at the site. This would have direct implications for affected households, including disruption to childcare arrangements, increased travel costs and pressure on alternative ECD facilities in the surrounding area. This can, however, be mitigated by appropriately planned development phasing.

The need for an ECD within the proposed development is recognised and provision is made in the land use mix and development concept for a successful developer to activate.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON ECD CENTRE**	
Nature of impact:	Negative	None
Extent and duration of impact:	Local and short term (for the duration of the construction of the proposed development)	Not applicable
Consequence of impact or risk:	High: Disruption to the existing ECD centre	The no-go alternative results in an opportunity cost by foregoing development on a suitable and well-located site.
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Medium	Not applicable
Degree to which the impact can be reversed:	Partially reversible	Not applicable
Indirect impacts:	Disruption to childcare arrangements for affected households	Not applicable
Cumulative impact **prior** to mitigation:	High negative	Not applicable
Significance rating of impact **prior** to mitigation **(**e.g. Low, Medium, Medium-High, High, or Very-High)	High negative	Not applicable
Degree to which the impact can be avoided:	Unavoidable: The demolition and rebuild of the ECD facility is part of the proposed concept design	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
CONSTRUCTION PHASE		
Potential impact and risk:	**TEMPORARY IMPACT ON ECD CENTRE**	
Degree to which the impact can be managed:	Medium: The impact can be managed by ensuring that no demolition of the existing ECD facility occurs until a suitable, compliant and operational temporary facility has been secured	Not applicable
Degree to which the impact can be mitigated:	Medium: see mitigation measures below	Not applicable
Proposed mitigation:	• Ensure that no demolition of the existing ECD facility occurs until a suitable, compliant and operational temporary facility has been secured • Locate the temporary facility, where possible, within the broader area to minimise disruption to access or existing users	Not applicable
Residual impacts:	Low: some short-term disruption to access and travel patterns may remain	Not applicable
Cumulative impact post mitigation:	Medium-high negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high negative	None

1.2 Post-construction phase

The post-construction phase of this project includes impacts associated with the completion of the development (i.e. visual and heritage impacts) as well as operation of the proposed development. (i.e. transport and socio-economic impacts).

1.2.1 Socio-economic impacts

*Extracted from the Socio-Economic Impact Assessment (**Appendix G3**) and supplemented by EAP recommendations.*

Once construction of the proposed development is complete, its post-construction phase is expected to generate further positive impacts on the local economy. Ongoing activities associated with building maintenance, as well as the operation of commerce, hotel, and retail components, will contribute to sustained economic activity and employment. Conversely, under the no-go alternative, the site would continue to function below its optimal economic potential, representing a missed opportunity to enhance productivity and economic output within a strategically located urban precinct. The following socio-economic impacts have been identified, as per the SEIA report (Urban Econ, 2026).

1.2.1.1 Impact on production and GDP
1.2.1.2 Impact on employment
1.2.1.3 Impact on household income
1.2.1.4 Impact on government revenue
1.2.1.5 Impact on skills development
1.2.1.6 Impact on traffic flow (from a socio-economic perspective)
1.2.1.7 Impact on sense of place (visual)
1.2.1.8 Impact on land value
1.2.1.9 Impact on access to civic facilities and services
1.2.1.10 Impact on ECD care
1.2.1.11 Impact on recreational activity
1.2.1.12 Impact on housing availability and affordable housing

1.2.1.1 <u>Impact on production and GDP</u>

The operational phase of the proposed development will have a substantial impact on production and GDP in the local economy. The proposed development will generate new economic activity, including through maintenance of the buildings and operation of the office, hotel and retail space. This will result in the operation of the preferred development option directly yielding R393 million in GDP. These direct impacts will stimulate further economic activity, thus creating additional contributions to GDP and production through indirect and induced impacts. Under the no-go alternative, the site would continue to operate below its optimal economic potential, resulting in a foregone opportunity to increase production and economic output within a strategically located urban precinct.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON GDP & PRODUCTION**	
Nature of impact:	Positive	None
Extent and duration of impact:	Regional and long-term	Not applicable
Consequence of impact or risk:	Medium: Permanent increase in GDP and production due to operation of the proposed development	The no-go alternative results in an opportunity cost by foregoing development on a suitable and well-located site.
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Low: no loss anticipated	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	The post-construction operation of the proposed development has the potential to support secondary economic activities, including maintenance, services, and supply chains, thereby contributing to and strengthening the local business environment.	Not applicable
Cumulative impact **prior to enhancement:**	Medium positive	Not applicable
Significance rating of impact **prior to enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	Not applicable
Degree to which the impact can be avoided:	Not applicable – positive impact	Not applicable
Degree to which the impact can be managed:	Not applicable – positive impact	Not applicable
Degree to which the impact can be mitigated:	Not applicable – positive impact	Not applicable
Proposed mitigation:	No mitigation required – positive impact	Not applicable
Degree to which the impact can be enhanced:	Medium	Not applicable
Proposed enhancement:	• Operators of the development should prioritise local procurement practices for the sourcing of materials as well as the hiring of staff and contracting of services as far as feasible to maximise local economic benefits	Not applicable
Residual impacts:	Long-term injection into the local economy	Not applicable
Cumulative impact post mitigation:	Medium-high positive	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high positive	None

1.2.1.2 Employment creation

The proposed development will create direct employment opportunities post-construction through the operation and management of the mixed-use development. The inclusion of retail and hospitality components in the design concept will create employment opportunities within shops, restaurants and service-oriented businesses. During the post-construction phase, the development is expected to support sustained job creation, providing stable, long-term employment within a well-located urban area. This contributes to local economic activity and enhances livelihood opportunities for surrounding communities. Additionally, the proposed development may create further employment opportunities through indirect and induced impacts, in sectors such as transport, retail and manufacturing.

Modelling indicates that the preferred option is expected to generate approximately 2 170 direct jobs . Employment opportunities will span multiple skill levels, including low and semi-skilled positions (e.g., retail staff, cleaning, security and hospitality services), as well as skilled and high-skilled roles (e., office-based employment, management and technical positions). The inclusion of a hospitality component is expected to further enhance job creation, particularly in service-oriented roles.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
POST CONSTRUCTION PHASE		
Potential impact and risk:	**PERMANENT EMPLOYMENT OPPORTUNITIES**	
Nature of impact:	Positive	Opportunity cost of not contributing to employment creation.
Extent and duration of impact:	Regional and long-term (post-construction the mixed-use development will provide stable and long-term employment)	Not applicable
Consequence of impact or risk:	High: In the post-construction phase, direct economic impacts in the form of permanent employment opportunities due to the ongoing operation and maintenance of the proposed development, and indirect impacts due to the capital investment.	Opportunity cost of not contributing to employment creation.
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Low: no loss anticipated	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	Indirect employment creation is anticipated in the manufacturing and transport sectors. Stable employment also creates financial security for households, improving standards of living.	Not applicable
Cumulative impact **prior to enhancement:**	Medium-high positive	Not applicable
Significance rating of impact **prior to enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high positive	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**PERMANENT EMPLOYMENT OPPORTUNITIES**	
Degree to which the impact can be avoided:	Not applicable – positive impact	Not applicable
Degree to which the impact can be managed:	Not applicable – positive impact	Not applicable
Degree to which the impact can be mitigated:	Not applicable – positive impact	Not applicable
Proposed mitigation:	No mitigation required – positive impact	Not applicable
Degree to which the impact can be enhanced:	Medium: socio-economic impacts can be enhanced through certain enhancement measures (see below)	Not applicable
Proposed enhancement:	• Operators of the development should hire employees from local communities where feasible to create maximum benefits for local employment. • Efforts should be made to sub-contract to local companies, particularly SMMEs and BBBEE compliant enterprises, where feasible	Not applicable
Residual impacts:	Long-term addition of jobs to the local economy	Not applicable
Cumulative impact **post enhancement:**	Medium-high positive	Not applicable
Significance rating of impact **after enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	High positive	None

1.2.1.3 Impact on household income

The operational phase of the proposed development will result in sustained increases in household income through the creation of permanent employment opportunities and associated business activity. Income will be generated through wages earned by employees within the retail, office and hospitality components of the development, as well as through supply chain activities linked to maintenance, services and operations.

Based on modelling, the preferred option is expected to generate a total of approximately R230.8 million in household income. These income effects will extend beyond directly employed individuals through indirect and induced impacts, including increased spending within the local economy. Increased household income contributes to improved living standards, including enhanced access to food, healthcare, education and other essential goods and services, these benefits are expected to accrue across a broad range of households. Under the no-go alternative, these income gains would not be realised, representing a loss of potential socio-economic upliftment associated with the site.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON HOUSEHOLD INCOME**	
Nature of impact:	Positive	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON HOUSEHOLD INCOME**	
Extent and duration of impact:	Regional and long-term (permanent household income increases through the creation of permanent job opportunities)	Not applicable
Consequence of impact or risk:	Medium-high: Permanent increase in household income for those employed at the proposed development	Opportunity cost of not contributing to stable household income increases.
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	Increased household income supports improved standards of living, which may include better nutrition, access to healthcare and education, and long-term upwards socio-economic mobility	Not applicable
Cumulative impact **prior to enhancement:**	Medium-high positive	Not applicable
Significance rating of impact **prior to enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high positive	Not applicable
Degree to which the impact can be avoided:	Not applicable – positive impact	Not applicable
Degree to which the impact can be managed:	Not applicable – positive impact	Not applicable
Degree to which the impact can be mitigated:	Not applicable – positive impact	Not applicable
Proposed mitigation:	No mitigation required – positive impact	Not applicable
Degree to which the impact can be enhanced:	Medium as described below	Not applicable
Proposed enhancement:	• Operators of the development should hire employees from local communities where feasible to create maximum benefits for local employment. • Efforts should be made to sub-contract to local companies, particularly SMMEs and BBBEE compliant enterprises, where feasible	Not applicable
Residual impacts:	Long-term increase in household incomes for affected households	Not applicable
Cumulative impact **post enhancement**:	High positive	Not applicable
Significance rating of impact **after enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	High positive	None

1.2.1.4 Impact on government revenuetree

The operational phase of the proposed development will contribute to government revenue. This includes City-level revenue from property taxes, as well as national-level revenue from corporate income tax paid businesses and personal income tax paid by employees. These revenues support the provision, maintenance and expansion of public infrastructure and services. Under the no-go alternative, the site would continue to operate below its optimal economic potential, resulting in a foregone opportunity to enhance both municipal and national revenue streams.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON GOVERNMENT REVENUE**	
Nature of impact:	Positive	Not applicable.
Extent and duration of impact:	National and long-term (permanent sustainable contribution to government revenue)	Not applicable
Consequence of impact or risk:	Medium: Sustained increase in government revenue	Opportunity cost of not contributing to government revenue.
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	Increased government revenue will support the maintenance and expansion of local infrastructure and public services	Not applicable
Cumulative impact **prior to enhancement:**	Medium positive	Not applicable
Significance rating of impact **prior to enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	Not applicable
Degree to which the impact can be avoided:	Not applicable – positive impact	Not applicable
Degree to which the impact can be managed:	Not applicable – positive impact	Not applicable
Degree to which the impact can be mitigated:	Not applicable – positive impact	Not applicable
Proposed mitigation:	No mitigation required – positive impact	Not applicable
Degree to which the impact can be enhanced:	None	Not applicable
Proposed enhancement:	Not applicable	Not applicable
Residual impacts:	Tax revenue for local and national government	Not applicable
Cumulative impact **post enhancement:**	Medium positive	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON GOVERNMENT REVENUE**	
Significance rating of impact **after enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	None

1.2.1.5 Impact on skills development

The operational phase of the proposed development will create ongoing opportunities for skills development across a range of sectors, including retail, hospitality and facilities management. These roles provide important entry points into the formal labour market and enable employees to acquire practical, work-based and transferable skills such as customer service, operations management, administrative support, technical maintenance and workplace compliance.

While a large portion of employment will be concentrated in service-oriented roles, the development will also support opportunities for skills progression into supervisory, managerial and specialised positions over time. These opportunities support human capital development within the regional and broader Cape Metro area, particularly for individuals entering the workforce or seeking to build experience. Under the no-go alternative, these skills development opportunities would not be realised, representing a missed opportunity to strengthen the local skills base.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON SKILLS DEVELOPMENT**	
Nature of impact:	Positive	Not applicable
Extent and duration of impact:	Regional and long-term (permanent skills developed)	Not applicable
Consequence of impact or risk:	Medium-high: Opportunities for skills development in retail, hospitality and facilities management	Opportunity cost of not strengthening local skills
Probability of occurrence:	Probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	Skills development can enhance the ability of employees to maintain stable employment, as well as the potential for future employment opportunities at higher skill levels and income brackets.	Not applicable
Cumulative impact **prior** to mitigation:	Low positive	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low positive	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON SKILLS DEVELOPMENT**	
Degree to which the impact can be avoided:	Not applicable – positive impact	Not applicable
Degree to which the impact can be managed:	Not applicable – positive impact	Not applicable
Degree to which the impact can be enhanced:	Medium: the benefits of skills development are already inherently positive and can be enhanced as described below	Not applicable
Proposed mitigation:	• Operators of the development should hire employees from local communities where feasible to create maximum benefits for local workers	Not applicable
Residual impacts:	Improved skills base in local labour market	Not applicable
Cumulative impact post mitigation:	Medium positive	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	None

1.2.1.6 Impact on traffic flow (from a socio-economic perspective)

The operational phase of the proposed development will create additional traffic around the development site, due to the new residents, as well as retail, hotel and office activities. Commuters – both commuting from the residential buildings, as well as to the office, retail and hotel – will utilise a combination of private and public transport. This will increase traffic volumes, particularly on the arterial routes adjacent to the site (Helen Suzman Boulevard and Main Road).

The Transport Impact Assessment indicates that, despite the increase in traffic volumes, surrounding intersections are expected to continue operating at acceptable levels of service (Appendix). However, the additional traffic is likely to contribute to incremental increases in congestion, delays and travel times along these already busy corridors. Public participation feedback has highlighted existing congestion concerns along Helen Suzman Boulevard and Main Road, and the proposed development may add to these pressures, particularly during peak hours.

From a socio-economic perspective, increased congestion during peak hours may result in higher travel time costs for commuters and could affect the reliability of public transport services operating along these routes. However, the site's location within a well-connected, mixed-use and transit-accessible urban area with proximity to the CBD and established public transport networks is expected to support a degree of modal shift and potentially reduce reliance on private vehicles. The inclusion of structured basement parking will accommodate on-site demand and limit spillover parking impacts into surrounding residential areas

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON TRAFFIC FLOW**	
Nature of impact:	Negative	Not applicable
Extent and duration of impact:	Local and long-term (permanent increase in traffic volumes in the surrounding area)	Not applicable
Consequence of impact or risk:	Increased traffic volumes resulting in increased traffic congestion in the surrounding area	None
Probability of occurrence:	Definite	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Low	Not applicable
Degree to which the impact can be reversed:	Non-reversible	Not applicable
Indirect impacts:	Increased traffic congestion may dissuade visitors to the site and surrounding area, which could have negative socio-economic outcomes	Not applicable
Cumulative impact **prior** to mitigation:	High negative	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High negative	Not applicable
Degree to which the impact can be avoided:	Unavoidable: Some impact on traffic surrounding the site is expected and unavoidable	Not applicable
Degree to which the impact can be managed:	Medium: Upgrading the signal phasing and timings of the intersections could improve traffic operations (from the TIA – **Appendix G4**)	Not applicable
Degree to which the impact can be mitigated:	Moderate: See recommended mitigation measures below	Not applicable
Proposed mitigation:	• Development should be well-integrated with public transport and non-motorised transport infrastructure • Optimisation of signal phasing and timings at surrounding intersections, as per traffic impact assessment • All access gates to remain open during operating hours of retail, hotel, office and community land uses to prevent queuing during peak hours, as per traffic impact assessment	Not applicable
Residual impacts:	Increase in traffic volumes and peak-period congestion	Not applicable
Cumulative impact post mitigation:	Medium-high negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high negative	None

1.2.1.7 Impact on sense of place (visual)

The post-construction phase of the proposed development refers to the stage at which permanent built structures are established on the site. The visual impact assessment (VIA) finds that the concept design proposal retains the identified visual corridors, reflects the scale of surrounding development, maintains permeable urban structure, frames the Green Point Common, avoids excessive bulk and produces a coherent skyline. As a result, the VIA concludes that the residual visual impacts are low-medium for visual corridors, medium-low for Green Point Common views, low for skyline views and neutral to positive for streetscape views, with an overall residual visual impact that is low to medium-low and therefore acceptable.
Comments received during public participation do, however, indicate concern, particularly from residents along Main Road. Requests from participants include limiting the height of buildings and the conducting of a shading analysis to ensure that residents in existing buildings are not negatively impacted.

The proposed concept design has been considered in relation to the City of Cape Town Tall Building Policy (Policy Number 11907), which provides guidance for the planning, design and assessment of tall buildings within the municipal area. The policy aims to ensure that tall buildings are appropriately located, respond sensitively to their urban context and contribute positively to the public realm, skyline and surrounding built environment. **Key considerations include contextual height, integration with surrounding land uses, protection of important views and heritage resources, pedestrian-friendly ground floor interfaces, and the mitigation of impacts such as shadowing, wind and infrastructure pressure.**

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON SENSE OF PLACE (VISUAL)**	
Nature of impact:	Negative	The site in its current state is underutilised and an eye sore to its immediate surrounding area
Extent and duration of impact:	Local and long-term (permanent high-level built structures on the proposed site)	Not applicable
Consequence of impact or risk:	Visual impact on sense of place, particularly for surrounding residents	None
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Low	Not applicable
Degree to which the impact can be reversed:	Non-reversible	Not applicable
Indirect impacts:	Potential localised negative perception impacts for some residents (especially those along Main Road/south of the development)	Not applicable
Cumulative impact **prior** to mitigation:	Medium negative	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative	Not applicable
Degree to which the impact can be avoided:	Unavoidable: Some visual impact is expected and unavoidable	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON SENSE OF PLACE (VISUAL)**	
Degree to which the impact can be managed:	Moderate: Via alignment with visual recommendations and guidelines in the VIA (**Appendix G2**)	Not applicable
Degree to which the impact can be mitigated:	High: See recommended mitigation measures below	Not applicable
Proposed mitigation:	• Maintain compliance with VIA design guidelines (height graduation, visual corridors, permeability) • Consider shading and visual interface treatment along sensitive edges (e.g., Main Road)	Not applicable
Residual impacts:	Some change in visual sense of place	Not applicable
Cumulative impact post mitigation:	Low negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative	None

1.2.1.8 Impact on land value

The proposed development will result in the redevelopment of an underutilised, well-located site within the Atlantic Seaboard, which is expected to contribute to the strengthening of surrounding property values over time. The introduction of a high-quality mixed-use development, including residential, retail, office and hospitality components, is likely to enhance the attractiveness, functionality and economic activity of the area, thereby supporting incremental increases in land and property values in the surrounding precinct.

However, the area is already characterised by relatively high property values and strong market demand. Therefore, the development is more likely to support existing market trends rather than greatly change them. From a socio-economic perspective, increases in land and property values may have both positive and negative effects. While higher property values can benefit existing property owners and contribute to a stronger municipal rates base, they may also lead to increased property-related costs, including rates and rental prices, which could affect affordability for some residents and businesses. Overall, the impact on land values is expected to be moderate and incremental, with both positive and negative socio-economic implications.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON LAND VALUES**	
Nature of impact:	Positive	Not applicable
Extent and duration of impact:	Local and long-term (permanent redevelopment of an underutilised, well-located site)	Not applicable
Consequence of impact or risk:	Increase in land values of surrounding properties due to rezoning and development of underutilised land	None

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON LAND VALUES**	
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Low	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	Mixed: Increased property values may raise rates and rental costs, affecting affordability, benefits to property owners and municipal revenue base	Not applicable
Cumulative impact **prior** to mitigation:	Low positive	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low positive	Not applicable
Degree to which the impact can be avoided:	Not applicable	Not applicable
Degree to which the impact can be managed:	Not applicable	Not applicable
Degree to which the impact can be mitigated:	Low: No significant way of mitigating the impact of the development on land values post-construction	Not applicable
Proposed mitigation:	None	Not applicable
Residual impacts:	Not applicable	Not applicable
Cumulative impact post mitigation:	Low positive	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low positive (While higher property values can benefit existing property owners and contribute to a stronger municipal rates base, they may also lead to increased property-related costs, including rates and rental prices, which could affect affordability for some residents and businesses.)	None

1.2.1.9 Impact on access to civic facilities and services

Post-construction of the proposed development will result in sustained improvements in access to civic facilities and services through the retention and upgrading of the Colin Eglin Library and Sea Point Civic Centre. The refurbishment and enhancement of these facilities will improve their functionality, accessibility and overall quality, enabling them to better serve the needs of the surrounding community within the Three Anchor Bay and the broader Atlantic Seaboard area.

The upgraded facilities are expected to support a wider range of users, including students, job seekers, elderly residents and community groups, by providing improved access to information resources, digital services, study spaces and community programmes. The integration of these civic uses within

a mixed-use development is also likely to enhance visibility, accessibility, and safety, contributing to increased utilisation over time. Under the no-go alternative, the site would continue to operate below its full potential, limiting opportunities to enhance the quality and accessibility of civic infrastructure in the area.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON ACCESS TO CIVIC FACILITIES & SERVICES**	
Nature of impact:	Positive	Not applicable
Extent and duration of impact:	Local and long-term (permanent upgrades to civic facilities – library and civic centre	Not applicable
Consequence of impact or risk:	Medium-high: Improved access, functionality and quality of civic facilities (library and civic centre)	None
Probability of occurrence:	Probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable – positive impact	Not applicable
Indirect impacts:	Improved civic infrastructure may increase demand for usage from the surrounding community	Not applicable
Cumulative impact **prior to enhancement:**	Medium positive	Not applicable
Significance rating of impact **prior to enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	Not applicable
Degree to which the impact can be avoided:	Not applicable – positive impact	Not applicable
Degree to which the impact can be managed:	Not applicable – positive impact	Not applicable
Degree to which the impact can be mitigated:	Not applicable – positive impact	
Proposed mitigation:	None – positive impact	
Degree to which the impact can be enhanced:	Medium: enhancements can be achieved through measures such as improved design, universal accessibility, active programming, and effective facility management, all of which can increase community use and overall benefit.	Not applicable
Proposed enhancement:	• Ensure that facility upgrades are aligned with the needs of the community and serve to improve the functioning and longevity of the civic infrastructure	Not applicable
Residual impacts:	Improved civic infrastructure	Not applicable
Cumulative impact **post enhancement:**	Medium-high positive	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON ACCESS TO CIVIC FACILITIES & SERVICES**	
Significance rating of impact **after enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	High positive	None

1.2.1.10 Impact on ECD care

The proposed development makes provision for an ECD facility as part of the overall land use mix, including a purpose-built building and associated outdoor space within the development. This represents a positive long-term impact, as it recognises the importance of ECD services within the area and integrates this function into a well-located, mixed-use urban environment.

A purpose-built ECD facility has the potential to improve the quality and functionality of early childhood services through dedicated indoor and outdoor space. The location of the facility within a broader civic and community focused node, including proximity to the public library, creates opportunities for complementary programmes such as early learning and reading initiatives. The proposal includes a stop&drop facility for the ECD which also improves safety for learners and parents. Lastly, the inclusion of an ECD facility also supports working households in the surrounding area by contributing to the availability of childcare services in a high-demand location.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON ECD CARE**	
Nature of impact:	Positive	Not applicable
Extent and duration of impact:	Local and permanent (permanent relocation of a purpose-built ECD facility on the site)	Not applicable
Consequence of impact or risk:	Medium-high: Provision of a purpose-built ECD facility as part of the development	None
Probability of occurrence:	Highly probable	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable	Not applicable
Indirect impacts:	Improved access to early childhood services and support for working households	Not applicable
Cumulative impact **prior to enhancement:**	Medium positive	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON ECD CARE**	
Significance rating of impact **prior to enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	Not applicable
Degree to which the impact can be avoided:	Not applicable – positive impact	Not applicable
Degree to which the impact can be managed:	Not applicable – positive impact	Not applicable
Degree to which the impact can be mitigated:	Not applicable – positive impact	
Proposed mitigation:	None – positive impact	
Degree to which the impact can be **enhanced:**	High: the provision of a purpose-built ECD facility offers significant scope for optimising social benefits for the surrounding community; enhancements can further increase the long-term value and social benefits of the ECD facility.	Not applicable
Proposed enhancement:	• Ensure that the ECD facility is purpose-built and designed to meet current operational and regulatory requirements, including adequate indoor and outdoor space	Not applicable
Residual impacts:	Sustained positive contribution to local social infrastructure and early childhood service provision	Not applicable
Cumulative impact **post enhancement:**	High positive	Not applicable
Significance rating of impact **after enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	High positive	None

1.2.1.11 Impact on recreational activity

The proposed development will result in the cessation of existing recreational land uses on the site, including a private sports club and bridge centre. These facilities currently serve a defined user group and contribute to recreational activity within the immediate area. It is important to note that the site does not currently function as publicly accessible open space bur rather accommodates private recreational activities. The surrounding area includes publicly accessible recreational assets like the Green Point Park, which serves a broader catchment. The impact is therefore localised and affects specific user groups rather than the general public. While the loss of these facilities represents a negative impact for existing users, it is not considered to result in a significant reduction in overall recreational provision within the area.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON RECREATIONAL ACTIVITY**	
Nature of impact:	Negative	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON RECREATIONAL ACTIVITY**	
Extent and duration of impact:	Local and long-term (permanent loss of recreational land uses on the proposed site)	Not applicable
Consequence of impact or risk:	Medium: Cessation of certain current recreational activities on the site	Recreational uses and activities on the current site are privatised and not publicly accessible
Probability of occurrence:	Definite	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Low	Not applicable
Degree to which the impact can be reversed:	Irreversible	Not applicable
Indirect impacts:	Displacement of users to alternative facilities	Not applicable
Cumulative impact **prior** to mitigation:	Medium negative	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative	Not applicable
Degree to which the impact can be avoided:	Unavoidable: The proposed development will result in the loss of some privatised recreational space	Not applicable
Degree to which the impact can be managed:	Low: No recommended management measure post-construction	Not applicable
Degree to which the impact can be mitigated:	Low: No recommended mitigation measures apply post-construction for this impact	Not applicable
Proposed mitigation:	None (While the loss of the onsite private recreational facilities represents a negative impact for existing users, it is not considered to result in a significant reduction in overall recreational provision within the area.)	Not applicable
Residual impacts:	Not applicable	Not applicable
Cumulative impact post mitigation:	Medium negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative	None

1.2.1.12 Impact on housing availability and affordable housing

Cape Town has been facing a housing crisis, with demand exceeding supply such that prices in several areas have become unaffordable for residents. The proposed development will add a significant number of residential units to an area where demand is very high, thus contributing to housing availability. Additionally, the proposed development will include at **minimum 20% affordable housing**, allowing middle-income households an opportunity to live in an area where the market almost exclusively caters to high-income earners. It is important to note that affordable housing refers to housing catered at households earning up to R34 400 per month (as of 2025), which translates to a maximum rent of approximately R11 500 per month. Affordable housing is also considered in context of its surrounding area.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON HOUSING AVAILABILITY & AFFORDABLE HOUSING**	
Nature of impact:	Positive	None
Extent and duration of impact:	Local and long-term (the proposed mixed-use development will contribute to the long-term supply of well-located affordable housing)	Not applicable
Consequence of impact or risk:	High: Increase in housing in the Three Anchor Bay/Green Point area. The provision of affordable housing in close proximity to the CBD is expected to result in a positive impact by improving access to employment opportunities, services and public transport.	Opportunity cost of not contributing to the provision of affordable housing in a well-located area in close proximity to the City's CBD.
Probability of occurrence:	Definite	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not applicable – positive impact	Not applicable
Indirect impacts:	Improved access to well-located housing and potential reduction in commuting distance. Additionally, downstream positive socioeconomic outcomes for beneficiaries, as well as increased economic activity in the Three Anchor Bay/Green Point area.	Not applicable
Cumulative impact **prior to enhancement:**	Medium-high positive	Not applicable
Significance rating of impact **prior to enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high positive	Not applicable
Degree to which the impact can be avoided:	Not applicable – positive impact	Not applicable
Degree to which the impact can be managed:	Not applicable – positive impact	Not applicable
Degree to which the impact can be mitigated:	Not applicable – positive impact	
Proposed mitigation:	None – positive impact	
Degree to which the impact can be **enhanced:**	High	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**SUSTAINED IMPACT ON HOUSING AVAILABILITY & AFFORDABLE HOUSING**	
Proposed enhancement:	• Inclusion of a requirement for development of affordable housing within the development rights/conditions, at minimum of 20% as per the development concept	Not applicable
Residual impacts:	Increased housing availability – including of affordable housing for middle income households	Not applicable
Cumulative impact **post enhancement:**	High positive	Not applicable
Significance rating of impact **after enhancement** (e.g. Low, Medium, Medium-High, High, or Very-High)	High positive	None

1.2.2 Transport Impacts

1.2.2.1 Road intersection capacity impacts

The following intersections are overall operating at unacceptable levels of service (LOS E/F) or have approaches operating at unacceptable LOS during both peak hours:

- Three Anchor Bay Road/Main Road,
- Three Anchor Bay Road/Beach Road,
- Helen Suzman Boulevard/Beach Road
- Main Road/ York Road

However, by optimising the signal phasing and timings, it is possible to improve the traffic operations at the above-mentioned four intersections to be able to achieve acceptable LOS with minimal average delays during both peak hours.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**TRANSPORT IMPACTS**	
Nature of impact:	Negative	Negative
Extent and duration of impact:	Local and long-term	Local and long-term
Consequence of impact or risk:	Medium: due to medium intensity, local extent and long-term duration	Not applicable
Probability of occurrence:	Possible	Current situation
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	No loss of resources

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**TRANSPORT IMPACTS**	
Degree to which the impact can be reversed:	Not reversible but is rectifiable (capacity can be improved)	Not reversible but is rectifiable (capacity can be improved)
Indirect impacts:	None	None
Cumulative impact prior to mitigation:	Medium negative (without mitigation the proposed development could worsen the traffic at identified intersections)	Not applicable
Significance rating of impact prior to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative	Not applicable
Degree to which the impact can be avoided:	Cannot be avoided	Not applicable
Degree to which the impact can be managed:	Medium: can be managed by routine maintenance to ensure signal phasing and timings remain functional	Not applicable
Degree to which the impact can be mitigated:	High: the LOS can be improved at the identified intersections and specified mitigation recommendations implemented as described below	Not applicable
Proposed mitigation:	• Improved intersection operation by optimising signal phasing and timings at the Three Anchor Bay, Main Road, Beach Road, Helen Suzman and York Road intersections, after which no capacity constraints are expected, and spare capacity will be available. No geometric changes are required. • The remaining study intersections are currently operating at acceptable LOS with spare capacity during both peak hour and no upgrades are proposed. • No capacity constraints, that cannot be addressed by signal optimisation, are expected in any of the scenarios assessed, and all study intersections will continue to operate at acceptable LOS with the additional site generated traffic added to the network. No upgrades are proposed. • The existing two LILO accesses to the public library, the civic centre and the crèche along Three Anchor Bay and Main Road will remain unchanged and continue to provide access. • Three accesses are proposed along Main Road, located opposite Richmond Road, St Bedes Road and Hill Road. The Richmond Road access will be signalised and have one lane per direction. The remaining two accesses will be stop-controlled on the development side and have	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**TRANSPORT IMPACTS**	
	one lane per direction. The Hill Road access will only provide access to the hotel component of the development. • It is proposed that the two existing accesses along Helen Suzman Boulevard be reconfigured onto a left-in only access and a left-out only egress, with improved spacing. The left-in access is located approximately 320 m east of Beach Road, while the left-out egress should be located approximately 140 m east of Beach Road. • To prevent queues from forming at the access points, it is proposed that all access gates be left open during the operating hours of the facilities. • The proposed development can potentially generate between 10 bus trips (5 in, 5 out) and 14 bus trips (7 in, 7 out) during the peak hours. Provision should be made by the city to accommodate the additional public transport demand that will be generated by the site. • Sidewalks must be provided along the frontage of the site and tie into the existing sidewalks. • Pedestrian and cycle facilities should be provided along the internal road network. • It is also proposed that the parking rates provided for PT1 zones should be applied instead of the required PT2 zone parking requirements.	
Residual impacts:	None	Not applicable
Cumulative impact post mitigation:	Low negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative (The TIA concludes that transport-related impacts associated with the proposed development can be efficiently mitigated through the implementation of the above measures)	Not applicable

1.2.3 Visual impacts

*Extracted from the Visual Impact Assessment (**Appendix G2**)*

A summary of the Visual Impact Assessment Methodology is provided below:

Visual impact significance is determined using the assessment methodology and principles set out in the CSIR Guidelines for Involving Visual and Aesthetic Specialists in EIA Processes (2006). **Significance ratings presented below describe the degree of visual change, while the nature of impact**

(beneficial, neutral or adverse) is identified in the accompanying narrative. Significance is determined through the combined evaluation of receptor sensitivity and magnitude of change. Sensitivity refers to the degree to which a visual receptor (being an individual or group likely to experience visual effects) or the landscape itself can accommodate visual change without adverse impact. It is informed by factors such as the importance of the visual resource, viewer expectations, duration of views, and the heritage context. High-sensitivity receptors typically have strong visual expectations and a limited capacity to accommodate change, while moderate-sensitivity receptors can absorb a reasonable degree of change. Lower-sensitivity receptors, often associated with short-duration or infrastructure-dominated views, generally have a greater capacity to accommodate visual change.

Magnitude of visual change describes the extent of visual alteration introduced by the proposed development. This is assessed in relation to the scale of the development, the proportion of the view it occupies, its contrast with the surrounding environment, the distance from key viewpoints, and the overall extent of the affected view. High magnitude impacts arise where development dominates the view or substantially alters landscape character; medium magnitude impacts reflect noticeable but non-dominant changes; low magnitude impacts indicate minor visual influence; and negligible magnitude impacts occur where the development is barely perceptible or visually insignificant.

Impact significance (expressed as Low, Medium, Medium–High, High, etc.) is derived from the combination of receptor sensitivity and magnitude of visual change, in accordance with the assessment matrix presented in Section 8.6 of the VIA (**Appendix G2**). These ratings indicate the **degree of visual change** experienced by a receptor, particularly within high-sensitivity environments, and do not in themselves denote whether an impact is positive or negative. The nature of impact describes the qualitative outcome of that change and is identified as beneficial (positive), neutral, or adverse (negative). This judgement is based on the extent to which the proposed development enhances or detracts from the visual quality, spatial structure, and landscape character of the receiving environment.

It is therefore possible for a development to result in a high level of visual change (high significance) while simultaneously producing a beneficial visual outcome, particularly where the proposal improves urban coherence, spatial definition, or landscape integration. Conversely, low levels of change may still be adverse where they affect highly sensitive or valued visual resources. In this assessment, significance ratings and impact nature are presented together to provide a balanced and transparent evaluation of both the degree of change and its qualitative effect on the visual environment. Refer to Section 8 of the Visual Impact Assessment (**Appendix G2**) for more detailed methodology.

A statement on the no-go alternative

From a visual perspective, this option would avoid the introduction of new built form and would therefore retain existing views currently enjoyed from surrounding residential properties and public spaces. The no-go alternative would also avoid any potential visual impacts associated with increased building height, changes to skyline composition, or alteration of the existing urban edge.

However, the no-go alternative would not address the current fragmented and underutilised condition of the site. The former bowling greens have largely lost their original function and visual quality, with portions either hardened, degraded or visually neglected. The site currently presents a

discontinuous and poorly defined interface between the surrounding neighbourhood, Helen Suzman Boulevard and the Green Point Common. Surface parking areas, dispersed structures and residual open spaces contribute to a visually weak urban edge and limited sense of place.

While the no-go alternative would retain existing views, it would also perpetuate the current visual condition of the site and would not realise opportunities for landscape renewal, improved public realm integration, enhanced spatial definition, or a more coherent relationship with the Green Point Common.

The no-go alternative is therefore considered visually neutral in that it avoids development-related visual change but does not address the existing visual shortcomings of the site.

Where significance ratings are described as Medium, Medium–High or High, these ratings refer to the degree of visual change and should not be interpreted as indicating a negative impact. The nature of impact is described separately within each assessment table.

1.2.3.1 Impact on Corridor Viewpoints

Four visual corridors have been identified as fundamental components of the development, and include the St Bede's Road Corridor, Hill Road Corridor, Clyde Road Corridor and Wigtown Corridor. These corridors play an important role in maintaining visual permeability between the neighbourhood and the coast, reinforcing the legibility of the urban grid, reducing the perceived bulk of the development and preserving a sense of spatial openness. They represent the most sensitive visual receptors, as they sustain the visual relationship between the neighbourhood and the coastline. In addition, they also structure the urban grain, provide orientation and reinforce the character of the surrounding landscape. The retention of corridor permeability is therefore a primary requirement for achieving acceptable visual outcomes.

Corridor viewpoints are closely associated with adjacent residential receptors, as these view alignments originate within the surrounding neighbourhood. As such, the assessment of corridor performance also reflects the visual experience of residents, including changes to outlook and perception of built form. While the proposed development introduces a degree of enclosure within these corridors, the retention of visual openings and articulated massing ensures that visual permeability is maintained and that impacts remain localised and moderate in extent.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON VISUAL CORRIDORS**	
Nature of impact:	Impact considered acceptable	None
Extent and duration of impact:	Local and long-term (permanent alteration of the visual character of the area)	Not applicable
Consequence of impact or risk:	The proposed development retains all four principal visual corridors and ensures that they remain visually open and clearly legible. The continued legibility of corridor alignments ensures that views toward the coast and surrounding landscape remain clear and uninterrupted. By framing rather than terminating	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON VISUAL CORRIDORS**	
	views, the building masses contribute to a sense of spatial definition without creating visual barriers. The retention of visible openings further supports visual permeability, maintains orientation within the urban environment, and reinforces the overall sense of openness.	
Probability of occurrence:	Definite	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not reversible (visual impacts post construction of development permanently alters the visual character of the area and cannot be undone without demolishing or substantially modifying the development).	Not applicable
Indirect impacts:	No indirect impacts, the proposed development is in keeping with the current visual corridors. Building masses frame rather than terminate the view and visual openings remain evident.	Not applicable
Cumulative impact **prior** to mitigation:	Medium-high. The current underutilised site comprises fragmented land uses, surface parking and dispersed structures which contribute to a weak and poorly defined urban edge	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high visual change	Not applicable
Degree to which the impact can be avoided:	Low: cannot be avoided but can be mitigated through design and planning measures. By retaining the identified visual corridors, maintaining adequate visual widths, preventing continuous built form within these corridors, and aligning them with existing street axes, potential adverse effects are minimised.	Not applicable
Degree to which the impact can be managed:	Not applicable but can be managed. It should be noted that the mitigation measures identified in this assessment are largely embedded within the development concept itself.	Not applicable
Degree to which the impact can be mitigated:	Moderate: by considering the visual indicators the impacts of visual corridors can be mitigated as described below.	Not applicable
Proposed mitigation:	In order to maintain visual permeability, the following requirements must apply: • Minimum 10m clear visual width across all 4 site visual corridors • No continuous built form crossing corridors • No solid podium structures • No tall screening vegetation	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON VISUAL CORRIDORS**	
	• Corridors to remain visually legible within the site layout • Corridors should not function as vehicular routes but must remain as discernible visual openings aligned with the surrounding urban structure • Development should frame corridor views to allow the visual connection between the neighbourhood and the Green Point Common to remain legible. The purpose of these corridors is to maintain visual permeability through the urban fabric rather than creating uninterrupted long-distance views.	
Residual impacts:	Visual change, which may be perceived as both positive and negative	Not applicable
Cumulative impact post mitigation:	Visual change, which may be perceived as both positive and negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low-medium visual change. Impact is considered acceptable provided visual corridor widths are maintained.	None

1.2.3.2 Visual Impact on the Green Point Common Interface

Views from the Green Point Common comprise wide-angle public views in which the site forms part of a highly sensitive urban edge. These views are particularly sensitive to excessive building height, continuous façades and any loss of openness. As such, developments should frame rather than dominate the Common.

In its current state, the site is effectively a visual amenity in its immediate context and is considered an eyesore. Fragmented land uses, surface parking and dispersed structures create a weak and poorly defined urban edge along the Common. The proposed development presents an opportunity to improve the spatial definition and visual coherence along this interface. The concept design establishes a clear and legible urban edge with buildings that are configured to define rather than enclose the space and the skyline remains varied and articulated.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON THE GREEN POINT COMMON INTERFACE**	
Nature of impact:	Impact considered acceptable, with the development contributing to a more coherent and legible urban edge while maintaining the visual primacy of the Common.	None
Extent and duration of impact:	Local and long-term (permanent alteration of the visual character of the area)	Not applicable
Consequence of impact or risk:	The development enhances the overall visual quality and legibility of the area by strengthening the urban edge, improving spatial definition, and reinforcing the	Recently the site has suffered neglect, with the former bowling

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON THE GREEN POINT COMMON INTERFACE**	
	relationship between built form and open space. By framing rather than enclosing the Common, it preserves openness and key views, resulting in an improved public realm experience and a more coherent and visually integrated landscape.	greens now either tarred over, or completely dried out and the site is currently mostly an eyesore
Probability of occurrence:	Definite	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not reversible (visual impacts post construction of development permanently alters the visual character of the area and cannot be undone without demolishing or substantially modifying the development).	Not applicable
Indirect impacts:	No indirect impacts, the development is in keeping with the current visual character of the immediate surrounding landscape.	Not applicable
Cumulative impact **prior** to mitigation:	Long-term alteration is cumulative with a general densification trend in the surrounding area.	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	High visual change	Not applicable
Degree to which the impact can be avoided:	Low: cannot be avoided but can be effectively mitigated through the appropriate design and planning measures outlined below.	Not applicable
Degree to which the impact can be managed:	Moderate: adherence to the recommended design guidelines and conditions of approval outline in the VIA, will ensure that the development frame rather than dominate the Common, thereby sustaining its visual prominence. As such, the impact is considered manageable with the potential to deliver a positive visual outcome if these measures are strictly applied.	Not applicable
Degree to which the impact can be mitigated:	Moderate: potential negative long-term visual impacts can be mitigated through appropriate architectural and landscape design.	Not applicable
Proposed mitigation:	Potential long-term visual change associated with development of the urban edge on the Green Point Common can be mitigated through appropriate architectural and landscape design. Development must maintain the spatial primacy of the Common, provide landscaped edges, avoid continuous building walls and maintain openness.	Not applicable
Residual impacts:	Visual change, which may be perceived as both positive and negative	Not applicable
Cumulative impact post mitigation:	Visual change, which may be perceived as both positive and negative	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON THE GREEN POINT COMMON INTERFACE**	
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-low visual change. Impact considered acceptable.	None

1.2.3.3 Visual Impact on Streetscape

Streetscape views occur primarily along Main Road and are influenced by building height, the degree of street enclosure, façade articulation, and ground-level activity. Development in this context should reflect the incremental grain of Three Anchor Bay, avoid monolithic building forms, incorporate articulated massing and respond to the surrounding scale. The proposed development aligns with these principles and reflects the established scale of the area. The architectural model demonstrates compatible building heights, active frontages, and the creation of a coherent and well-defined street edge.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON STREETSCAPE**	
Nature of impact:	Positive. Since the proposed development aligns with the incremental grain of the area, avoids monolithic forms, incorporates articulated massing and responds to the surrounding scale.	None
Extent and duration of impact:	Local and long-term (permanent alteration of the visual character of the area)	Not applicable
Consequence of impact or risk:	The structural concept design approach will result in a long-term visual change.	Recently the site has suffered neglect, with the former bowling greens now either tarred over, or completely dried out and the site is currently mostly an eyesore
Probability of occurrence:	Definite	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not reversible (visual impacts post construction of development permanently alters the visual character of the area and cannot be undone without demolishing or substantially modifying the development).	Not applicable
Indirect impacts:	No indirect impacts, the development is in keeping with the immediate surrounding streetscape.	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON STREETSCAPE**	
Cumulative impact **prior** to mitigation:	Medium-high: Main Road is characterised by continuous frontage; mid-rise buildings; active ground floors.	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium visual change	Not applicable
Degree to which the impact can be avoided:	Low: the impact cannot be fully avoided, as any development on the site will inherently alter the streetscape. However, careful design can ensure that the changes are compatible with the existing urban character.	Not applicable
Degree to which the impact can be managed:	Moderate: the impact can be managed through sensitive architectural and urban design measures (see below). Proper planning and design oversight can guide the development to integrate well with the surrounding context.	Not applicable
Degree to which the impact can be mitigated:	High: given the relative significance of the receiving environment and the current massing of the surrounding urban development, the potential impact is rated as low with mitigation.	Not applicable
Proposed mitigation:	Mitigation measures include varying building heights, façade articulation, human-scaled public spaces, setbacks, landscaping, active ground-floor uses and maintaining visual connections.	Not applicable
Residual impacts:	Visual change, which may be perceived as both positive and negative	Not applicable
Cumulative impact post mitigation:	Visual change, which may be perceived as both positive and negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low visual change. Impact considered to have a positive to neutral visual outcome despite the introduction of built form. At street level, the proposed development introduces increased spatial definition, active frontages, and improved continuity of the urban edge. These changes are considered to enhance the streetscape experience and contribute positively to the visual character of the Main Road corridor.	None

1.2.3.4 Visual Impact on Infrastructure Viewpoints

Helen Suzman Boulevard forms the northern boundary of the site and represents a major transport corridor linking the city centre to the Atlantic Seaboard. The boulevard is visually characterised by wide carriageways, prominent traffic infrastructure, limited pedestrian activity and open views toward the Green Point Common. Its scale and function create a strong infrastructural edge that contrasts with the finer-grained character of the surrounding neighbourhood. Visually, the boulevard is considered a lower sensitivity environment, although development along this edge remains visible from the Common and promenade. The proposed development aims to introduce urban enclosure and reduce infrastructure dominance.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON INFRASTRUCTURE VIEWPOINTS**	
Nature of impact:	Positive. The proposed development introduces urban enclosure and reduces infrastructure dominance.	None
Extent and duration of impact:	Local and long-term (permanent alteration of the visual character of the area)	Not applicable
Consequence of impact or risk:	Visually, the impact improves integration with the surrounding finer-grained neighbourhood while remaining compatible with the infrastructural edge of the boulevard.	Recently the site has suffered neglect, with the former bowling greens now either tarred over, or completely dried out and the site is currently mostly an eyesore
Probability of occurrence:	Definite	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not reversible (visual impacts post construction of development permanently alters the visual character of the area and cannot be undone without demolishing or substantially modifying the development).	Not applicable
Indirect impacts:	No indirect impacts, the development is in keeping with the current visual character of the immediate surrounding landscape.	Not applicable
Cumulative impact **prior** to mitigation:	Long-term alteration is cumulative with a general densification trend in the surrounding area. The proposed development is located in a infrastructure-dominated environment.	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium visual change	Not applicable
Degree to which the impact can be avoided:	Low. The introduction of built form along the boulevard edge cannot be entirely avoided if the site is to be developed.	Not applicable
Degree to which the impact can be managed:	High. The impact can be effectively managed through building articulation, landscape treatment, controlled height variation and maintenance of visual permeability.	Not applicable
Degree to which the impact can be mitigated:	Not applicable, as the development enhances the urban definition of the infrastructure corridor and helps to mediate the scale of the surrounding transport infrastructure.	Not applicable
Proposed mitigation:	Not applicable, as the development enhances the urban definition of the infrastructure corridor and helps to mediate the scale of the surrounding transport infrastructure.	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON INFRASTRUCTURE VIEWPOINTS**	
Residual impacts:	Medium positive. The proposed development enhances urban definition along the boulevard, reduces the visual dominance of transport infrastructure, and contributes to a more coherent and integrated streetscape.	Not applicable
Cumulative impact post mitigation:	Medium visual change: impact is considered beneficial	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium visual change. Impact considered positive because the development introduces urban enclosure and reduces infrastructure dominance.	None

1.2.3.5 Visual Impact on Distance Viewpoints

Distant viewpoints represent long-distance visibility and illustrate the contribution of the development to the broader Atlantic Seaboard skyline. Wide-angle views across the Common toward Signal Hill. These views occur from Signal Hill, the promenade and elevated streets, and the site contributes to the overall skyline composition.

Within these views, the development integrates into the overall skyline composition, presenting a varied and visually balanced form that reflects the varied height pattern characteristic of the surrounding area. The development does not introduce a dominant skyline element and is unlikely to significantly intrude on key distant viewpoints toward Signal Hill or Lion's Head. The architectural model indicates that the development will read as part of the existing urban fabric rather than as an isolated landmark. As such, the development contributes to the continuity of the Atlantic Seaboard urban skyline rather than establishing a new or intrusive skyline feature.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON DISTANT VIEWPOINTS**	
Nature of impact:	Acceptable impact. The proposed development does not introduce a dominant skyline element and is unlikely to significantly intrude on key distant viewpoints toward Signal Hill or Lion's Head.	None
Extent and duration of impact:	Local and long-term (permanent alteration of the visual character of the area)	Not applicable
Consequence of impact or risk:	As per the architectural model, the proposed development integrates with the existing urban fabric and reinforces the established skyline without creating a dominant or intrusive element.	Recently the site has suffered neglect, with the former bowling greens now either tarred over, or completely dried out and the site is currently mostly an eyesore

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON DISTANT VIEWPOINTS**	
Probability of occurrence:	Definite	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not reversible (visual impacts post construction of development permanently alters the visual character of the area and cannot be undone without demolishing or substantially modifying the development).	Not applicable
Indirect impacts:	No indirect impacts, the development is in keeping with the current skyline of the immediate surrounding landscape.	Not applicable
Cumulative impact **prior** to mitigation:	Long-term alteration is cumulative with a general densification trend in the surrounding area.	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium visual change	Not applicable
Degree to which the impact can be avoided:	Low: the impact cannot be avoided as any new development will be visible within the skyline and will alter the existing visual composition of the area to some degree.	Not applicable
Degree to which the impact can be managed:	High: the impact can be effectively managed through careful architectural design, including controlled building height variation, a graduated massing strategy to ensure consistency with the surrounding skyline.	Not applicable
Degree to which the impact can be mitigated:	High: mitigation through design refinement can ensure that the development remains integrated (see mitigation measures below).	Not applicable
Proposed mitigation:	It should be noted that the mitigation measures considered in this assessment are largely embedded within the development concept itself, and include the following: • A graduated massing strategy to create a more refined and context-responsive built form • Alignment of building heights with the surrounding landscape to ensure visual compatibility • Controlled building height variation (approximately 30 to 45 metres), contributing to skyline articulation and reflecting the varied height pattern characteristic of the surrounding urban fabric • The incorporation visual and articulated massing to reflect the existing varied but coherent skyline pattern • The avoidance of monolithic building forms and excessive bulk	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON DISTANT VIEWPOINTS**	
Residual impacts:	Positive. The development will read as part of the continuous Atlantic Seaboard skyline, with no significant visual intrusion.	Not applicable
Cumulative impact post mitigation:	Medium-low visual change	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-low visual change. Acceptable because the development integrates into urban fabric and urban edge. No dominant intrusion and the skyline remains coherent.	None

1.2.3.6 Civic Node Visual Impacts (conceptual)

From a visual perspective, the proposed additions above portions of the existing library and civic hall differ materially from the broader redevelopment parcels, as they involve direct intervention within a visually prominent civic and heritage component of the receiving environment. The Three Anchor Bay civic node currently functions as a coherent and relatively open civic ensemble within the surrounding urban landscape, contributing to institutional identity, spatial relief and the compositional clarity of the site. Development within this area therefore requires a higher degree of visual sensitivity than that associated with the adjacent redevelopment parcels.

Potential visual impacts associated with additions to the civic cluster include the loss of civic building legibility, visual subordination of retained heritage fabric, intrusive rooftop accretions, erosion of civic spatial openness, and architectural incompatibility with the established character of the ensemble.

Notwithstanding these considerations, the broader redevelopment concept incorporates the retained civic facilities within a more coherent and legible urban framework. At a precinct scale, this approach has the potential to strengthen spatial continuity, improve urban integration, and contribute positively to the character and functionality of the broader Three Anchor Bay–Sea Point interface. **The civic node assessment remains conceptual at this stage, as no detailed architectural proposal for additions to the retained civic buildings has yet been developed. The VIA therefore identifies potential visual risk areas and design principles rather than assessing a fixed development proposal. The extent to which any future additions may be accommodated without unacceptable visual, or heritage impact will require detailed architectural design development and further specialist visual and heritage assessment.**

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON CIVIC NODE (CONCEPTUAL)**	
Nature of impact:	Potentially adverse, depending on detailed architectural design and the extent to which the mitigation principles identified in the VIA are achieved. Change to the visual character, civic legibility, spatial openness and heritage setting of the	None

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON CIVIC NODE (CONCEPTUAL)**	
	retained civic cluster arising from potential vertical additions to the existing library and civic hall buildings.	
Extent and duration of impact:	Local and long-term (permanent alteration of the visual character of the civic node)	Not applicable
Consequence of impact or risk:	If not appropriately designed, scaled and setback, vertical additions could reduce the visual legibility and prominence of the retained civic cluster, compromise the setting of heritage resources, diminish the sense of spatial openness within the civic node, and adversely affect townscape character.	Not applicable
Probability of occurrence:	Definite	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of resources	Not applicable
Degree to which the impact can be reversed:	Not reversible (visual impacts post construction of development permanently alters the visual character of the area and cannot be undone without demolishing or substantially modifying the development).	Not applicable
Indirect impacts:	Potential changes to the perception of the civic cluster as a landmark civic ensemble and incremental erosion of civic identity and heritage significance if additions are not sensitively designed.	Not applicable
Cumulative impact **prior** to mitigation:	Medium-high visual change. The introduction of additional built form within a visually sensitive civic and heritage node can lead to reduced civic legibility and diminished spatial openness.	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium-high visual change	Not applicable
Degree to which the impact can be avoided:	Low: the impact cannot be avoided as any new development will be visible within the skyline and will alter the existing visual composition of the area to some degree.	Not applicable
Degree to which the impact can be managed:	High: the impact can be effectively managed through careful architectural design, including controlled building height variation, a graduated massing strategy to ensure consistency with the surrounding skyline.	Not applicable
Degree to which the impact can be mitigated:	High: mitigation through design refinement can ensure that the development remains integrated (see mitigation measures below).	Not applicable
Proposed mitigation:	The following mitigation measures should be implemented should vertical additions to the retained civic hall and public library be pursued:	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**VISUAL IMPACTS ON CIVIC NODE (CONCEPTUAL)**	
	• Retained civic buildings must remain the visually dominant elements within the civic ensemble; • Any new additions should be subordinate in scale and massing, visually recessive, and appropriately setback from the primary building façades and rooflines; • Visually intrusive rooftop accretions should be avoided; • New development should be integrated through a high standard of architectural design that is sympathetic to the character and significance of the retained civic buildings; • The spatial openness, visual legibility and civic identity of the civic cluster should be maintained and enhanced; • Detailed architectural proposals should be subject to specialist visual and heritage review to ensure that the significance of the civic ensemble is not adversely affected.	
Residual impacts:	Low-medium, only where stringent mitigation measures are applied, including recessive architectural expression, appropriate setback, preservation of civic legibility and avoidance of visually dominant rooftop additions.	Not applicable
Cumulative impact post mitigation:	Low-medium visual change	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low-medium visual change	None

1.2.4 Heritage resources impacts

Building on the identification of heritage resources associated with the site, and an understanding of the proposed development, this section outlines and assesses the potential impacts on these resources. Based on the nature of the significance of the identified resources, the following impacts are anticipated:

1.2.4.1 Potential impact on the heritage significance and integrity of the Colin Eglin Library and Sea Point Civic Centre
1.2.4.2 Loss of a long-standing open space
1.2.4.3 Potential impact on the heritage significance of the surrounding urban landscape

Statement on the no-go scenario: Given the condition of the bulk of the site, the fact that the sports code that have historically occupied the site and developed it to cater to its needs, is no longer feasible on the site and the approved spatial planning for the site indicates development on at least a portion of the site, and the limited heritage significance of the bulk of the site, the **no-go option is not regarded as a feasible option**.

1.2.4.1 Potential Impact on the Heritage Significance and Integrity of the Colin Eglin Library and Sea Point Civic Centre

The development proposal largely preserves the civic node, comprising the Colin Eglin Library and Sea Point Civic Centre, which are considered the most significant heritage resources on the site. The existing functions of the library and main hall are retained, while alternative uses are proposed for the minor hall. The redevelopment offers the opportunity to undertake much needed repairs and maintenance work to the building complex and to reinforce its role as an important public space through the proposed additions and alterations. The proposed addition above the library portion has the potential for negative impacts on the building complex usage and architectural integrity and will require more detailed investigation to ensure that the heritage significance of the complex is not adversely affected, should this option be pursued.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
POST CONSTRUCTION PHASE		
Potential impact and risk:	**IMPACT ON THE HERITAGE SIGNIFICANCE AND INTEGRITY OF THE COLIN EGLIN LIBRARY AND SEA POINT CIVIC CENTRE**	
Nature of impact:	Negative: Insensitive additions and interventions may detract from its architectural significance and important social function. Positive: The redevelopment will subsidise repairs and maintenance work to the building complex and reinforce its role as a public space	None
Extent and duration of impact:	Local and long-term	Not applicable
Consequence of impact or risk:	Enhancement and continued use of key heritage resources, reinforcing the cultural significance, community value, and functional integrity of the civic node, with opportunities to strengthen its function as a key public space.	Opportunity cost of not improving functionality and capacity of civic node.
Probability of occurrence:	Likely. The retainment, repairs, maintenance, and upgrades form a core component of the development's proposal, making the impacts highly probable that the anticipated positive outcomes, such as improved building condition and enhanced public use will occur.	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	Medium: doubtful that at structural solution for additions above the library could be found that will not impact on the integrity of the reading room	Not applicable
Degree to which the impact can be reversed:	Low reversibility: while the changes to the heritage sites cannot be fully reversed without substantial intervention, the adoptive reuse of the spaces and sensitive integration of new elements ensure that the heritage significance and public function of the library and civic centre are maintained and, in some respects, enhanced.	Not applicable
Indirect impacts:	None	Not applicable
Cumulative impact **prior** to mitigation:	High negative (adding to existing development)	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Potentially high negative – depending on nature of proposed interventions to building complex	Not applicable
Degree to which the impact can be avoided:	Potentially avoidable by not allowing any additions and alterations, but this may impact the successful operation of the library service.	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**IMPACT ON THE HERITAGE SIGNIFICANCE AND INTEGRITY OF THE COLIN EGLIN LIBRARY AND SEA POINT CIVIC CENTRE**	
Degree to which the impact can be managed:	High: the impact can be managed through sensitive design, heritage-informed planning and appropriate operational measures. Urban design guidelines and structural interventions are to be approved by HWC. Carefully considered interventions must be overseen by a suitably qualified heritage architect.	Not applicable
Degree to which the impact can be mitigated:	Low: Potential impacts can be substantially mitigated through design and conservation interventions. experienced and qualified architect subject to further public consultation.	Not applicable
Proposed mitigation:	**The library and civic centre complex to be retained and maintained to a high standard.** • Appropriate addition above the library building is possible, provided the structural requirements do not impact on the integrity of the building below and the addition is designed to be recessive so as not to compete with the architectural integrity of the existing building complex. Whether this is achievable will require more detailed investigation and specialist input than provided for at this stage of the development process. • All proposed maintenance, repairs, alterations, and additions should be undertaken by a suitably qualified heritage architect with demonstrated experience in modernist buildings, and any proposed changes to the programme of the building complex should be subject to a public consultation process. • Maintenance and the resolution of problems such as rainwater drainage is required and this should be undertaken under the supervision of a heritage architect with suitable experience in modernist buildings. The City will have to ensure that any land deal compels the new owner to undertake this work as part of the redevelopment agreement. This should be included as a condition of approval. **Some adaptive re-use of certain spaces such as the minor hall could be considered.** • The conversion of the minor hall into a different kind of public space must be undertaken by a heritage architect with suitable experience in modernist buildings. In this regard it is important that the underlying structure/programme of the building is respected. • The proposed separation of the reading room from the library is potentially problematic as this space is regarded as an integral part of	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	IMPACT ON THE HERITAGE SIGNIFICANCE AND INTEGRITY OF THE COLIN EGLIN LIBRARY AND SEA POINT CIVIC CENTRE	
	the library, architecturally and in terms of use. This proposal should be revisited as an integral project to undertake alterations and additions to the building complex, as informed by a heritage architect with suitable experience in modernist buildings. Any such proposals should be submitted to HWC for approval, and subject to public consultation. **Accommodate the extension of the public uses/facilities sensitively** • Any extension to the library should be accomplished by the use of the light-weight gasket structure which connects the old and new, using a simple contemporary architectural language that will not compete with the original building. • As above any such work should be undertaken by, or with the input and oversight of a heritage architect with suitable experience in modernist buildings **Retain and upgrade the forecourt** • Only light-weight new structures should be allowed in the forecourt. The design of such structures should be cognisant of the original landscaping design (i.e. the use of circles) and should not compete with the building complex. Low, unroofed structures will be preferable with use of removable structures for shelter. • Consideration should be given to removing the fence as part of the upgrade. As above any such work should be undertaken by, or with the input and oversight of a heritage architect with suitable experience in modernist buildings and for approval by HWC. This should be included as a condition of approval.	
Residual impacts:	Low negative	Not applicable
Cumulative impact post mitigation:	Low negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium positive	None

1.2.4.2 Loss of a Long-Standing Open Space (the former bowling greens)

The site, which once formed part of the Green Point Common, has a long history of recreational use. However, it is important to note that much of the site (in particular the former bowling greens) was not accessible to the general public, having been effectively privatised by bowling clubs since the

early 20th century. As a result, this portion of the site is essentially only a visual amenity (unbuilt open space) in its current immediate context. In recent years, the site has experienced neglect, with the former bowling greens either tarred over or completely dried out, resulting in a degraded and visually unappealing environment (an 'eyesore'). Its historical connection to the Green Point Common has been effectively severed through the construction of the Helen Suzman Boulevard, further exacerbated by the unattractive nature of the associated interface.

The proposed development will thus result in the loss of the site in its current form as a visual amenity. Furthermore, the development is expected to significantly improve the interface that will read as an extension of the urban edge framing the Green Point Common along Beach Road in Mouillie Point.

Alternative:	**Proposed development (Preferred alternative)**	**No-Go Alternative**
POST CONSTRUCTION PHASE		
Potential impact and risk:	**LOSS OF A LONG-STANDING OPEN SPACE (THE FORMER BOWLING GREENS)**	
Nature of impact:	Negative: Visual amenity of former green space lost Positive: Improved interface with Helen Suzman and framing of the Green Point Common Neutral: Retention of eucalyptus avenue	None
Extent and duration of impact:	Local and long-term	Not applicable
Consequence of impact or risk:	Improved interface with Helen Suzman boulevard and framing of the Green Point Common.	Not applicable
Probability of occurrence:	Highly probable: this portion of the site has limited heritage significance.	Not applicable
Degree to which the impact may cause irreplaceable loss of resources:	No loss of heritage resources as this portion of the site has limited heritage significance.	Not applicable
Degree to which the impact can be reversed:	None	Not applicable
Indirect impacts:	None	Not applicable
Cumulative impact **prior** to mitigation:	Medium negative (adding to existing development)	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative	Not applicable
Degree to which the impact can be avoided:	High: avoidable if development is not pursued but an unrealistic option given the limited heritage significance of the site and the potential socio-economic benefits of development (i.e. high opportunity cost).	Not applicable
Degree to which the impact can be managed:	Not applicable, as the development enhances the boulevard interface and helps to mediate the scale of the surrounding transport infrastructure.	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**LOSS OF A LONG-STANDING OPEN SPACE (THE FORMER BOWLING GREENS)**	
Degree to which the impact can be mitigated:	Low: the development would result in the loss of the former bowling greens but enhances the boulevard interface and helps to mediate the scale of the surrounding transport infrastructure.	Not applicable
Proposed mitigation:	• Retention of corridor viewpoints through site and landscaping, in particular along Helen Suzman boulevard. • Implementation of the Landscape Master Plan – more detailed plans may be required at Precinct Plan level and should, inter alia, provide a programme to protect the Eucalyptus Avenue and plan replacement planting for the future; and provide details of context appropriate trees and other planting to establish a green edge that references the Green Point Common landscape	Not applicable
Residual impacts:	Low negative	Not applicable
Cumulative impact post mitigation:	Low negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative	None

1.2.4.3 Potential Impact on the Heritage Significance of the Surrounding Urban Landscape

The surrounding urban environment of the site is not considered to be of exceptional heritage significance, except for a few graded IIIC and one graded IIB buildings to the southeast of the development. These buildings are interspersed with buildings indicated as not conservation worthy. Nevertheless, it is considered important that the development should reflect on the existing urban grain and massing of the surrounding urban development, particularly in relation to the built form located south of the Main Road.

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**IMPACT ON THE HERITAGE SIGNIFICANCE OF THE SURROUNDING URBAN LANDSCAPE**	
Nature of impact:	Negative: Potential insensitive built form, impacting on the sense of place of the area Positive: Increased urban activity and vibrancy	None
Extent and duration of impact:	Local and long-term	Not applicable
Consequence of impact or risk:	Increased urban activity	
Probability of occurrence:	Highly probable	Not applicable

Alternative:	Proposed development (Preferred alternative)	No-Go Alternative
POST CONSTRUCTION PHASE		
Potential impact and risk:	**IMPACT ON THE HERITAGE SIGNIFICANCE OF THE SURROUNDING URBAN LANDSCAPE**	
Degree to which the impact may cause irreplaceable loss of resources:	Medium: urban environment is not of exceptional heritage significance, but it is nevertheless considered important that development should reflect on the grain and massing of the surrounding urban development.	Not applicable
Degree to which the impact can be reversed:	Not reversible	Not applicable
Indirect impacts:	None	Not applicable
Cumulative impact **prior** to mitigation:	Medium negative (adding to existing development)	Not applicable
Significance rating of impact **prior** to mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Medium negative	Not applicable
Degree to which the impact can be avoided:	High: avoidable with mitigation measures	Not applicable
Degree to which the impact can be managed:	High: Urban Design Guidelines to be approved by HWC at SDP stage	Not applicable
Degree to which the impact can be mitigated:	High: potential impacts can be substantially mitigated as described below	Not applicable
Proposed mitigation:	Mitigation measures would include • enforcing active street edges along Main Road at ground level; • restricting building heights along Main Road to 30m-35m with a maximum of 45m at key sites, whilst also ensuring that some variety in height is achieved; • building heights of up to 45m could be allowed along Helen Suzman Boulevard; • ensuring that the massing of development is sufficiently fine grained; • and that the architecture is sufficiently articulated and varied to avoid the negative impact of uniformity • more detailed Urban Design Guidelines must be prepared at SDP stage that include mechanisms to enforce the above to the satisfaction of HWC	Not applicable
Residual impacts:	Low negative	Not applicable
Cumulative impact post mitigation:	Low negative	Not applicable
Significance rating of impact after mitigation (e.g. Low, Medium, Medium-High, High, or Very-High)	Low negative	None

Note that the decommissioning and closure phase is not relevant to this project

SECTION I: FINDINGS, IMPACT MANAGEMENT AND MITIGATION MEASURES

1.	Provide a summary of the findings and impact management measures identified by all Specialist and an indication of how these findings and recommendations have influenced the proposed development.

The following specialist assessments were undertaken, and are included in **Appendix G** of this Basic Assessment Report:

- Heritage Impact Assessment (Lize Malan and Cindy Postlethwayt)
- Transport Impact Assessment (Innovative Transport Solutions)
- Visual Impact Assessment (David Gibbs)
- Socio-Economic Impact Assessment (Urban Econ)

Other assessments and reports associated with the project proposals include:

- Civil Engineering Services Report (EAS Infrastructure Engineers)
- Stormwater Management Plan (EAS Infrastructure Engineers)
- Engineering Services Report – Electrical (BVI Consulting Engineers)
- Project team status quo reports, property market analysis and feasibility assessments were also used to inform the proposed concept design

The above assessments and reports informed the development of the proposed Urban Design Concept (ACG Architects & Urban Design) – **Appendix L1**.

The findings and impact management measures identified are summarised below for each specialist assessment. Please refer to the original appended specialist reports for full details.

Heritage Impact Assessment

The below information has been extracted and summarised from the heritage impact assessment (HIA) – ***Appendix G1***

A heritage impact assessment was undertaken by Lize Malan in collaboration with Cindy Postlethwayt, 2026, based on the response to the notification of intent to develop by the heritage authority. A NID was submitted to Heritage Western Cape in terms of Section 38(1) of the National Heritage Resources Act, for a proposal to develop erf 2187 as a mixed-use high density residential and commercial development, i.e. thus also entailing the demolition of all structures on the site. In response to the NID, HWC requested a heritage impact assessment that should include the following specialist studies:

- Visual impact assessment
- Built environment analysis
- Architectural and landscape guidelines
- Socio-historic assessment

It is noted that the NID, submitted by vidamemoria, recommended that an archaeological assessment be included, but this requirement was not included in the ROD issued by HWC, most likely as the entire site has already been significantly disturbed by development and the changes of meaningful archaeological finds are thus minimal. The response to the NID is attached as **Appendix O**, along with proof that this response is still valid for this project.

The HIA (see **Appendix G1**) is published together with this draft Basic Assessment Report for the public participation process. Comments related to Heritage will be incorporated to the final HIA submission that will be reviewed by HWC Impact Assessment Committee Meeting (IACOM). A final comment from HWC will be submitted with the Final BAR for decision.

The findings of the Heritage Impact Assessment are as follows:

On-site Heritage Resources Identified

The following heritage resources has been identified on site and numbered on Figure 35 below:

1. The Colin Eglin Library and Sea Point Civic Centre with forecourt
2. The original bowls clubhouse
3. The historic substation building
4. The later bowls clubhouse building – now housing the Western Cape Bridge Club
5. The newest of the bowls clubhouse buildings – now housing the Pinocchio Crèche
6. The remnant of the eucalyptus avenue that lined Main Road and the southern boundary of the Green Point Common

Figure 35: Heritage resources identified on site

1. The Colin Eglin Library, Sea Point Civic Centre and forecourt - Grade IIIA

The quality of the library's main hall and the foyer of the civic centre and the quality of the construction of the buildings, as well as the architectural detail like the panelling, sprung flooring and the custom brise soil is exceptional.

2. The Original Bowls Clubhouse

According to the artefacts.co.za website, the Green and Sea Point Bowling Club house dates back to 1930 and therefore triggers Section 3(2) of the NHRA, which classifies structures older than 60 years as national heritage resources.

3. The Electrical Substation Building - Grade IIIB

The historic substation building dates back to the late 1920s/early 1930s and has architectural significance as a remaining example of industrial architecture of its era. This building is a rare example of the industrial architecture of its era, with detailing that elevates the building from merely a shed to an attractive building, thus warranting the IIIB grading.

4. The C.1950 Club House (now used by the WP Bridge Union)

It would seem that the popularity of bowling grew during the mid-20th century, and this led to the expansion of the greens and facilities on the site.

5. **The Eastern-end Bowling Clubhouse Building (now housing the Pinocchio Crèche)**

The building at the eastern end of the proposed site is a very modest, functional building of its era but however has no intrinsic architectural or other significance. The building has housed the Pinocchio Crèche since 1998 and was originally located in Fritz Sonnenberg Road and moved from there to accommodate the 2010 World Cup Soccer facilities. Thus, this possible intangible significance is not attached to the site specifically, as the crèche could be operated from any suitable facility in the area, without it impacting its social significance.

6. **The Eucalyptus Glade (on the eastern end of the site)**

The open area lined on either side with eucalyptus trees to the east of the site is noted as a heritage resource, as these trees formed part of a very long double tree belt planted on the northern side of the Somerset/Main Road from Ebenezer Road in the east to Three Anchor Bay Road in the west. This tree line thus also defined the southern boundary of the Green Point Common. The date of the planting is uncertain, but the trees are clearly indicated on the Wilson survey of 1878 and seems to have been established by that time. It is evident that the age and intentional pattern of planting of the tree avenue which is likely related to the use of the Common for horse racing is a significant remnant of the late 18th/19th century pattern of development in this part of the city. The eucalyptus tree avenue also has contextual significance as contributing to the green character of the Green Point Common.

Heritage Resources in the Immediate Vicinity of the Site:

1. **The Green Point Common**

The Green Point Common was declared a Provincial Heritage Site (PHS) in September of 2024. Historically, the location and the development of the Green Point Common from an open coastal plain, used as pasturage, to informal sporting and/or recreation activities in the late 18th century to the present Green Point Urban Park, contributes to the site being one of the most important public open space locations in the City of Cape Town. Over the years, the Green Point Common has always been a public open space and a place of congregation for various purposes, ranging from military mustering points and parades, a Prisoner of War camp during the Anglo-Boer War, cultural events and protest marches. Most importantly, as a public spatial landmark, it has organically evolved and is intrinsically linked to the cultural landscape and adjacent urban scape (Province of the Western Cape: Provincial Gazette 8982, p.675). **The area that was declared as a PHS contains the core of the remaining recreation/sports area and excludes the project site.**

Note: During the pre-statutory public engagements concerns were raised about the relation of the site to the Green Point Common and land use conditions/restrictions. Erf 2187 was part of the original Erf 1056, but in 2016 the original Green Point Common Erf 1056 was subdivided, resulting in Erf 2187 being registered and the balance of the Green Point Urban Park being on Remainder Erf 1056. The heritage specialist has confirmed that there are also no title deed conditions/restriction in the original grant to the City dating to 1923, that specifies that the land may only be used for a certain purpose.

2. **The Sea Point Promenade - Grade IIIA**

The Sea Point Promenade stretching along the Atlantic coastline from the Sea Point public swimming pool in the west to beyond the Green Point lighthouse in the east, is an important public open space, serving the larger Cape Town community. The City of Cape Town has summarised the significance of the promenade area bordering the Three Anchor Bay as a highly significant public open space with socio-historical significance. It is a natural bay with high scenic qualities and is associated with the Green Point Common and the old City.

3. The tree-lined Main Road sidewalk

The tree-lined sidewalk that borders the site on the southern side has been described as part of the Cape Town Fan Walk (although this usually refers to the route from the CBD to the Cape Town Stadium) and was established as part of the 2010 World Cup interventions. The sidewalk previously accommodated what could be described as a service road, that accommodated parking. This was converted into a pedestrian route in 2009, with hard and soft landscaping, including the planting of trees that have since matured and now form an avenue of three trees wide on the boundary of the site. This is a contemporary landscaping intervention which contributes well to the Main Road context but is not appropriate for protection in terms of the NHRA.

4. Graded Buildings along Main Road

There are a number of graded buildings immediately opposite the site facing Main Road (and the site) as shown in Figure 36 below. These buildings are numbered below. For a full description of each graded building please see attached **Appendix G1: Heritage Impact Assessment Report**.

Figure 36: Graded buildings along Main Road

- **A.** The Sea Point Primary School - Grade IIIB
- **B.** Rockaways – Grade IIC
- **C.** Belvedere – Grade IIIC
- **D.** Head South Lodge – Grade IIIC
- **E.** Ventnor Building – Grade IIIC
- **F.** Lancaster House – Grade IIIC
- **G.** Delwyn Court – Grade IIIB
- **H.** Ananda – Grade IIIC
- **I.** 191 Main Road – Grade IIIC
- **J.** 179 Main Road – Grade IIIC
- **K.** Green Point Pharmacy – Grade IIIB

Heritage Protection Overlay Zones

The site itself does not fall within a declared or proposed Heritage Protection Overlay Zone (HPOZ), but there are three such areas in close proximity to the site (see Figure 37 below) namely the Sea Point HPOZ which is located to the south-west of the site, Saint Bedes HPOZ which comprises of a historic residential area on either side of St Bedes Road, and the Green Point HPOZ which is the largest of the three areas and is located to the south-east of the site.

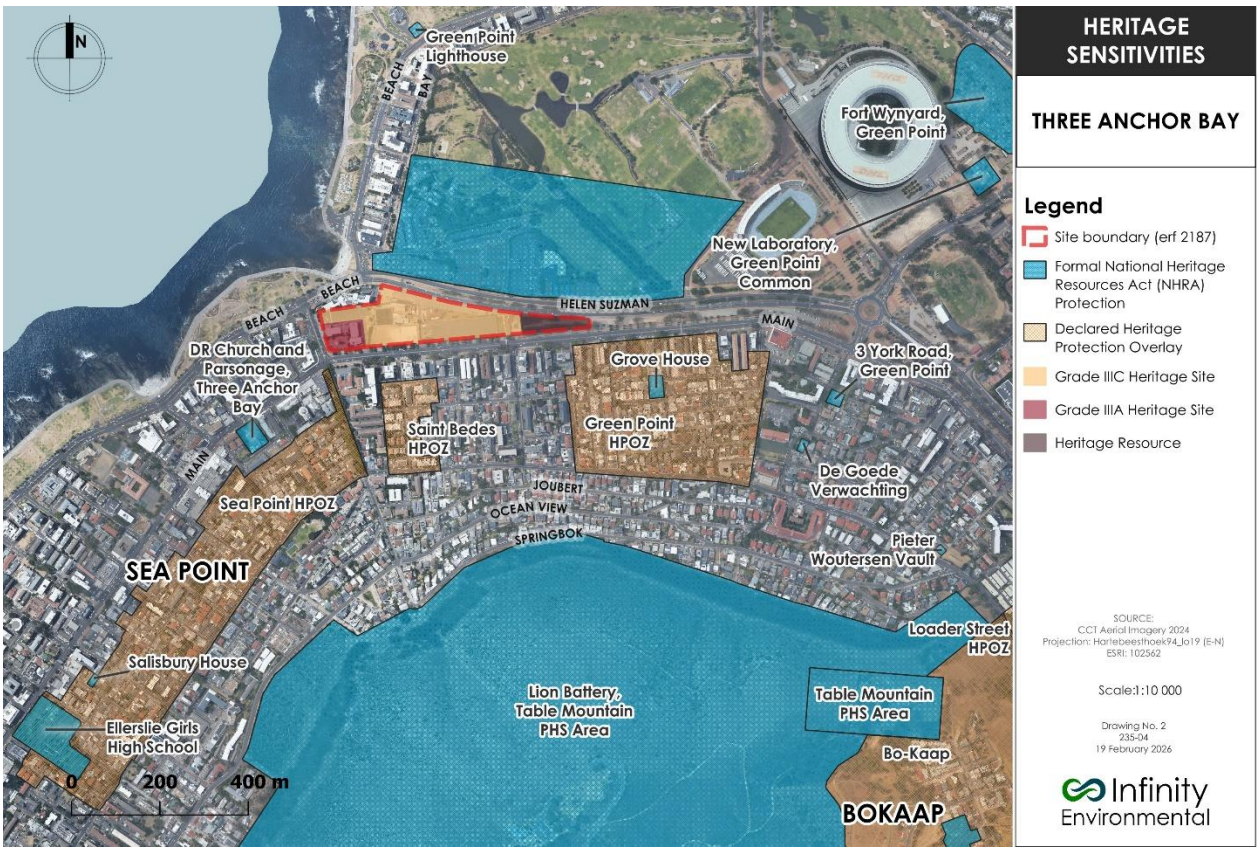


Figure 37: Heritage sensitivities surrounding the proposed site

Statement of significance

1. Architectural and Aesthetic Significance

The Colin Eglin Library and the Sea Point Civic Centre have architectural significance due to its exceptional quality of design and construction. Furthermore, the electrical substation building is a rare example of industrial architecture of its era and thus also has architectural significance. However, none of the clubhouse buildings are exceptional in any way and although some could be regarded as typical of their era, they are not rare examples of 20th century architecture and none of them are of sufficient merit to warrant their retention on the site. **Only the library and civic centre complex, and the eucalyptus trees on either end of the site has some aesthetic significance.**

2. Socio-historic Significance

It is acknowledged that the site has some historic significance as having formed part of the larger Green Point Common that was used by various sporting codes since the 19th century. The remaining rows of eucalyptus trees at the eastern end of the site is regarded as having some historic significance. The library, in particular, and the civic centre, although not historic clearly

plays an important role in the local community, by virtue of its location, form and public service and could be regarded as having some social significance, although this may not be considered to be of socio-historic significance. Overall, the socio-historical significance of the site is assessed as follows:

- Bowling greens and facilities = **low socio-historic significance**
- Library and civic centre = **medium to high socio-historic significance**
- Eucalyptus tree lines = **medium socio-historic significance**

3. Summary of Heritage Significance

Table 5: Summary of Heritage Significance

Resource	Grading/Proposed Grading	Nature of Significance
Colin Eglin Library & Sea Point Civic Centre	IIIA	Architectural and social
Eucalyptus Tree Avenue	IIIB	Historical
Electrical Substation	IIIB	Architectural
Clubhouses	NCW	NA
Contribution to Context	IIIB	Green space, views over site, interface with Main Road

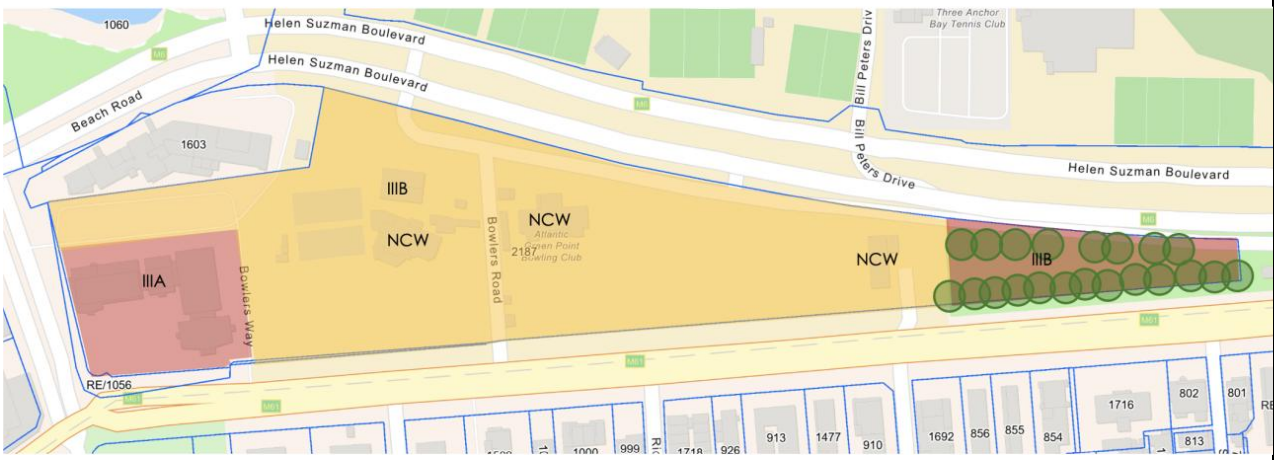


Figure 38: Heritage Resources on Site (Extract from HIA Report, 2026:61)

Based on the statement of significance, **it is evident that the bulk of the site has such limited inherent heritage value**, that the retention of the land currently graded IIIC, as is, cannot be justified when weighed against the potential socio-economic benefits of appropriate development. It is assumed that in respect of the future of the leaseholders, this HIA and planning process is to secure development rights and not to assign end users. The relevant lease agreements entered between the CoCT and legal tenants regulate the process regarding the current use of the site.

The contextual value of the site does require that development be carefully considered to ensure an appropriate built- form that would ultimately contribute positively to its context.

Heritage Indicators

The below summarises the heritage indicators as described in the HIA (refer to Appendix G1 for more details).

The Colin Eglin Library and Sea Point Civic Centre

- The library and civic centre complex to be retained and maintained to a high standard: The complex should be retained in its current form and should continue to accommodate the library and major hall in their current locations. Maintenance and resolution of the existing functional problems should be a requirement of any development approval and will require the oversight of an architect with expertise in modernist buildings. Since alterations will not trigger Section 34 of the NHRA (as the building is not older than 60 years), this submission should be linked as a condition of approval.

- Some adaptive re-use of certain spaces such as the minor hall could be considered: The adaptive re-use of certain spaces can be considered with the proviso that the complex remains a public venue and that any intervention is undertaken by an architect with expertise in modernist buildings. Such proposed interventions should be subject to further public consultation prior to submission to HWC for approval.

- Accommodate the extension of the public uses/facilities sensitively: The possible extension of the public uses / facilities on the site, particularly the library, should be welcomed as further cementing the complex's important social role. Any such extension may not impact on the façade of the building complex nor the eastern or western elevations. There could be scope for extension to the back of the building, provided that such extension ensures that the integrity of the built envelope of the complex is impacted minimally. Any such intervention is to be undertaken by an architect with expertise in modernist buildings. Such proposed interventions should be subject to further public consultation prior to submission to HWC for approval.

- Retain and upgrade the forecourt: The forecourt is to be retained and should ideally become outdoor social space for the community – it could be activated by uses such as markets, a performance space or coffee shops. The formality of the former space is not appropriate in the current context, but any interventions should reference the original design of the landscaping based on circles (still visible on site). A lightweight structure that does not compete with or obscure the façade, could be considered if required to accommodate the uses referred to above. Again, any such intervention is to be undertaken by an architect with expertise in modernist buildings. Such proposed interventions should be subject to further public consultation prior to submission to HWC for approval.

Demolition of other buildings/structures on the site

- None of the three bowls clubhouses, their outbuildings and related structures, although historic, are deemed conservation worthy and could be demolished. The substation building has some interest as an industrial building of its era and should if possible be retained and reused. However, if this proves to be an impediment to accommodate appropriate development on the site, that will also bring socio-economic benefits, such considerations will outweigh the architectural value of the building.

Retain tree lines

- The two rows of eucalyptus trees at the eastern end of the site, is to be retained and maintained, as a remnant of the earlier treed border to the common dating to the 1800s. The area between the trees could be reused with a proviso that any development may not impact on the viability of the trees. No other trees on the larger site are required to be retained.

Contextual indicators

- The following contextual indicators are aimed at achieving an appropriate response to the surrounding urban context, in particular the historical development to the south of Main Road. These indicators are relatively limited, in accordance with the extent of heritage significance identified.
    - Establish view lines through the site (north-south lanes between buildings)
    - Built form, scale and massing
    - Interface with Main Road
    - Protection of the contemporary tree landscape on Main Road
    - Interface with Helen Suzman Boulevard
    - Interface with Three Anchor Bay Road

Further requirements

- The site development plan should be accompanied by a landscape master plan, that sets the parameters for the nature and scale of landscaping on the site, in accordance with the relevant heritage indicators.
- In addition, urban design guidelines must be prepared to ensure the appropriate development of the site, and adherence to the heritage indicators.
- The development parameters that will be set out in the land use application, should ensure that the built form as set out above is achievable and enforceable.

Figure 39: Heritage indicators (extracted from the HIA – Appendix G1)

Anticipated Impacts on Heritage Resources

Given the nature and significance of the heritage resources identified the following impacts are anticipated:

- Potential negative impact on the heritage significance and integrity of the Colin Eglin Library and Sea Point Civic Centre. It is noted that **the civic buildings will be retained and will not be impacted** by the proposed development.
- The proposed development of the site will **result in the loss of long-standing open space**, which has some significance **although it was never accessible to the general public when**

used as bowling greens. It is noted that the **remnant eucalyptus tree avenue will be retained.**

- Potential negative impact on the heritage significance of the surrounding urban landscape. It is however noted that given the **low socio-historical significance** of the former bowling uses on the site, **no impact of significance** has been identified.

Assessment of Potential Impacts on Heritage Resources

The impacts and significance ratings are identified below, and the mitigation measures are described in the following section.

Potential Negative Impact on the Heritage Significance and Integrity of the Colin Eglin Library and Sea Point Civic Centre

The library and civic centre complex is arguably the most important heritage resource related to this site. As noted, it has architectural and social significance and thus potential impacts on these aspects could be of concern. It is further noted that the building complex does require repairs and maintenance and that the library facility, requires more space to accommodate their expanding services. The proposal retains the complex largely as is, including the functions of the library and major hall, with suggestions for changing the use of minor hall, extending the library to the rear and activating the forecourt with provision for outdoor seating and other facilities. However, the proposal for the addition of floor space above the library building is potentially of major concern as this could impact on the heritage significance of the building. It is for instance doubtful that at structural solution could be found that will not impact on the integrity of the reading room. Although it is noted that the proposed additional development on the civic node portion is intended to subsidise the upgrade and maintenance of the existing building complex, the impacts of these proposals can only be assessed at sketch plan stage. Should these impacts prove unacceptable, the feasibility for the cross-subsidisation of the necessary library and civic centre upgrades by the development as a whole should be investigated. Thus, any work to the building complex should be subject to further assessment, including public consultation.

Given that the building is not older than 60 years and that the site now forms part of an HIA undertaken in terms of Section 38(8) of the NHRA, this condition must be explicit in HWC's Final Comment to DEADP and then taken up in the final RoD to be issued by DEADP in the case where the NEMA application is successful.

The potential negative impacts (i.e. ill-considered or no interventions) are regarded as of high negative possibly reducing to medium positive depending on the detailed design.

Loss of Long-standing Open Space

The site having once formed part of the Green Point Common, has a long history of use for recreation purposes. However, due to the privatisation of the bowling clubs in the early 20th century the bulk of the site is not accessible to the general public. Thus, the site is effectively a visual amenity in its immediate context. Recently the site has suffered neglect, with the former bowling greens now either tarred over, or completely dried out and the site is currently mostly an eyesore. Its connection to the Green Point Common was effectively severed by the construction of Helen Suzman Boulevard, further exacerbated by the unattractive nature of the interface of the site with Helen Suzman. The eucalyptus avenue at the eastern end of the site is however a very prominent and tangible remnant of the history of the Green Point Common and of substantial heritage significance.

The proposed development of the site will thus lead to the loss of this former visual amenity, noting that the eucalyptus avenue will be retained (as well as of course the library and civic centre complex) somewhat mitigated by the retention of view lines through the site. It is also noted that the proposed development will improve the interface with Helen Suzman significantly and in its larger context the high-rise buildings will read as an extension of the built frame of the Green Point Common formed by the buildings along Beach Road in Mouille Point. The proper landscaping of this edge will create a suitable reference to the green space of the Common.

The significance of this impact, informed by the limited heritage significance of the bulk of the site, is rated as medium reducing to low with the mitigation in the form of landscaping.

Potential Negative Impact on the Heritage Significance of the Surrounding Urban Landscape

The site is located on the edge of the Green Point, an area characterised by mainly residential apartment buildings of varying age opposite the site on the other side of Main Road. A grade IIIB school campus is located opposite the library and civic centre complex. Many of the apartment buildings to the east of the school (i.e. opposite the former bowling portion of the site), are graded IIIC, with one graded IIIB. These buildings are interspersed with buildings indicated as not conservation worthy. Building heights vary from two to 10 storeys, and footprints also vary, with most buildings rectangular in shape with the short side facing Main Road. Some of the taller buildings have podiums that are wider than the floors above. It is also important to note that the GR5 zoning of the bulk of these properties, allows for buildings of up to 35m tall. The buildings along Main Road opposite former bowling greens are not included in the St Bede's HPOZ. At the eastern end, a portion of the Green Point HPOZ is located directly opposite the eucalyptus avenue. To the north-west, the CPOA building is a significant (not necessarily positive) landmark in the urban landscape due to its bulk and height. On the other side of Three Anchor Bay Road, are a mix of medium to high rise buildings not graded.

The urban environment is thus not of exceptional heritage significance, but it is nevertheless considered important that development should reflect on the grain and massing of the surrounding urban development, particularly that to the south of Main Road. Mitigation measures would include enforcing active street edges along Main Road at ground level, restricting buildings heights along Main Road to 30m-35m with a maximum of 45m at key sites, whilst also ensuring that some variety in height is achieved; building heights of up to 45m could be allowed along Helen Suzman Boulevard; ensuring that the massing of development is sufficiently fine grained; and that the architecture is sufficiently articulated and varied to avoid the negative impact of uniformity. To this end more detailed Urban Design Guidelines must be prepared at SDP stage that include mechanisms to enforce the above to the satisfaction of HWC. **Given the relative significance of the receiving environment, the potential impact is rated as of medium negative significance reducing to low with mitigation.**

Conclusion and Recommendations

Overall, the proposed development is regarded as conforming sufficiently to the heritage and visual indicators to be supported at this high-level conceptual stage. Given the relatively limited heritage significance of the bulk of the site and the undertaking to retain the Library and Civic Centre Complex largely as is, **the overall impact on heritage resources is considered to be of medium significance reducing to low significance with mitigation**. However, the proposed additional bulk on top of the library is difficult to assess at this stage. Ill-considered development would have a high negative impact on this building complex, but a well-designed addition, that is respectful of the building complex and its functioning, could be acceptable/neutral particularly as it could fund the upgrade and maintenance of the building complex. This can only be

ascertained when more details of the proposal become available. These findings are supported by the findings of the VIA.

Thus, this aspect of the development is not assessed at this point in time, and it is suggested that proposals related to the Library and Civic Centre complex such as the addition on top of the library building and the future use of the reading room is subject to further design development and public participation before it is considered by HWC for a approval (this to be a condition of the EA issued by DEADP).

Mitigation measures for the remainder of the development entail the preparation of urban design guidelines at SDP stage that expand on the design principles presented to date and should inter alia stipulate height restrictions, building typologies and in particular mechanisms to ensure variety in built form and architectural language across the site.

It is recommended that HWC:

- Having met the requirements of section 38(3) of the NHRA
- Endorses the Development Framework as a basis to guide development of the site, subject to the following conditions, which should be included as conditions of approval of the Environmental Authorisation in terms of NEMA: Any work to the Civic Centre and Library building complex – maintenance, repairs, alterations and additions are to be undertaken by, or with the input and monitoring of a heritage architect with suitable experience in modernist buildings and any alterations and additions should be subject to a further assessment, public consultation and approval by HWC.
    - The future repair, upkeep and maintenance of the Civic Centre and Library building complex, be specifically set as a condition of the EA approval (to be provided in the agreement with a successful bidder for the property)
    - The submission of urban design guidelines, to be presented to HWC for endorsement at SDP stage, and prior to any building plan approval. All further site development plan development or building plans should be substantially in accordance with the urban design guidelines or otherwise referred to HWC for approval.
    - Further detailed plans based on the Landscape Master Plan prepared by a suitably qualified landscape architect with the urban design guidelines for endorsement by HWC at SDP stage.
    - Endorses the demolition of the structures as indicated in the below in Figure 40.

Figure 40: Buildings to be demolished on site (ACG architects)

Visual Impact Assessment

The below information has been extracted and summarised from the visual impact assessment (VIA) – ***Appendix G2***

The VIA prepared by David Gibbs (2026), was guided by key visual indicators:

- Retention of visual corridors aligned with St Bedes Road, Hill Road, Clyde Road and Wigtown Road
- Integration with the surrounding urban fabric
- Articulated building massing
- Maintenance of pedestrian scale along Main Road
- Framing of the Green Point Common
- Maintenance of a coherent skyline

These indicators have been considered in the concept design phase and informed the proposed concept design (preferred alternative of this BAR). The following sections describe the proposed concept in the context of the surrounding environment and visual sensitivities, as well as visual recommendations.

Description of proposed development concept

The proposed development comprises a mixed-use urban precinct including residential, commercial and community use organised within a series of building clusters and public spaces. The development concept has been informed by urban design studies and heritage indicators and seeks to integrate the site into the surrounding urban fabric while maintaining visual permeability and public accessibility. The development proposal incorporates the retention and integration of key civic facilities within the overall precinct framework. Key components of the proposal include multiple building clusters arranged around landscaped open spaces; a network of pedestrian routes connecting Main Road with the Green Point Common and promenade; retention of key visual corridors aligned with surrounding streets; active mixed-use frontage along Main Road; landscaped edges facing the Green Point Common; and variation in building height to respond to the surrounding context.

The proposal includes a range of building heights reflecting the hierarchy of spaces across the site. Generally lower and medium-rise buildings are proposed along Main Road and adjacent residential areas, with taller elements located toward the boulevard edge and at selected corner conditions. The development concept is illustrated by a three-dimensional massing model prepared by the project architects and supplied in digital format for review by the visual specialist.

The architectural concept for the proposed development is defined by articulated building forms, fragmented massing, varied building heights, landscaped open spaces and an interconnected network of pedestrian routes. The concept therefore adopts **a graduated height strategy** that responds to the site's differing levels of visual sensitivities.

- **Lower and medium-rise buildings, generally ranging between 30 and 45 meters are proposed along Main Road and adjacent residential areas.** This approach reflects the established scale of development framing the Green Point Common**.**
- **Taller elements are positioned at key corners and threshold locations, while building heights increase along the Helen Suzman Boulevard frontage, up to approximately 45 meters**, where visual sensitivity is lower and where additional development heights can help mediate the scale of the surrounding transport infrastructure.
- **The proposal retains the identified visual corridors; reflects the scale of surrounding development; maintains a permeable urban structure; frames the Green Point Common; avoids excessive bulk; and produces a coherent skyline.**

In addition to the broader mixed-use redevelopment framework, revised concept testing has **considered development opportunities within the retained civic node, including potential vertical extensions to the existing library and civic building cluster.** Since these alterations involve varying levels of development above retained heritage fabric, they introduce additional visual and heritage-related considerations that will require further specialist assessment.

The development integrates with the surrounding urban fabric and establishes a coherent urban edge to the Green Point Common. The findings of the assessment are structured around four key themes that emerge from the analysis of the receiving environment and visual indicators:

1) the retention of visual corridors,
2) the relationship of the development to the Green Point Common landscape,
3) the proposed building height strategy, and
4) the resulting skyline composition.

The below sections describe the aspects considered and impacts assessed in the VIA.

Receiving environment

The regional visual context considered in the assessment includes the Atlantic Seaboard landscape, Green Point Common, coastal edge and promenade. The local townscape context includes the Three Anchor Bay urban fabric, Main Road corridor and Helen Suzman Boulevard Furthermore, the civic cluster which includes the Sea Point Library, civic hall and associated community facilities is assessed as a distinct visual unity, separate from the broader regional and local townscape context.

The civic cluster is not merely a retained built element, but a visually legible civic ensemble contributing to the identity, openness and compositional clarity of this part of the site. Its architectural form, roofscape, and relationship to surrounding open space contribute materially to the character of the receiving environment.

Any vertical intervention associated with this ensemble must therefore be assessed not only in terms of architectural compatibility, but in relation to its effect on civic hierarchy, visual legibility, spatial openness, and the broader townscape composition.

Key visual receptors (individuals or groups likely to experience the visual impacts) include the adjacent residents (high sensitivity), users of the Green Point Common (high sensitivity), promenade users (high sensitivity), and road users (e.g. motorists, cyclists, public transport users).

In terms of visual sensitivity, high sensitivity areas include the Green Point Common, promenade, residential streets aligned with the corridors, and elevated viewpoints on Signal hill. Additionally, any vertical alterations of the civic node occupy a materially more sensitive category than the broader redevelopment and any vertical intervention associated with this ensemble must therefore be assessed not only in terms of architectural compatibility, but in relation to its effect on civic hierarchy, visual legibility, spatial openness, and the broader townscape composition Moderate sensitivity areas include the Main Road frontage, interior portions of the site, and surrounding mixed-use areas. Lower sensitivity areas include Helen Suzman boulevard, infrastructure-dominated areas, and areas with limited public access.

The architectural massing model demonstrates a strong response to the visual indicators identified during the scoping phase.

These themes form the organising framework for the detailed viewpoint assessment and are carried through to the conclusions and recommended conditions of approval. The visual analysis indicates that the proposed development is largely compatible with its receiving environment and can be accommodated without resulting in unacceptable visual impacts. The architectural massing model responds effectively to key visual indicators identified during the scoping phase. Specifically, the proposal retains important visual corridors, aligns with the scale of surrounding developments, maintains a permeable urban form, frames the Green Point Common, avoids excessive bulk, and contributes to a cohesive skyline.

Recommendations that have been considered in the design

The visual specialist made the following recommendations (refer to Annexure A of the VIA – Appendix G2):

1. **Visual Corridor Viewpoints**

Corridor viewpoints represent the most sensitive visual receptors, as they preserve the visual relationship between the neighbourhood and the coast. The retention of corridor permeability is

therefore a key requirement for achieving acceptable visual outcomes. Accordingly, the four key identified visual corridors – St Bede's Road Corridor, Hill Road Corridor, Clyde Road Corridor and Wigtown Road Corridor – will be retained and secured through conditions of approval. These corridors should remain visually open, maintain a minimum visual width, align with the surrounding street network, and be kept free of continuous built form.

Figure 41: St Bedes view corridor

Figure 42: St Bedes view corridor with the proposed development inserted (extracted from the VIA – Appendix G2)

2. Building Heights

Building heights should follow a graduated height strategy: generally, 30-45m along Main Road and the Common up to approximately 45m along Helen Suzman Boulevard, as well as selective height accents permitted at appropriate locations. The graduated strategy reduces perceived

bulk, retains visual corridors and ensures that taller building elements are positioned where visual absorption capacity is higher. Uniform building heights should be avoided.

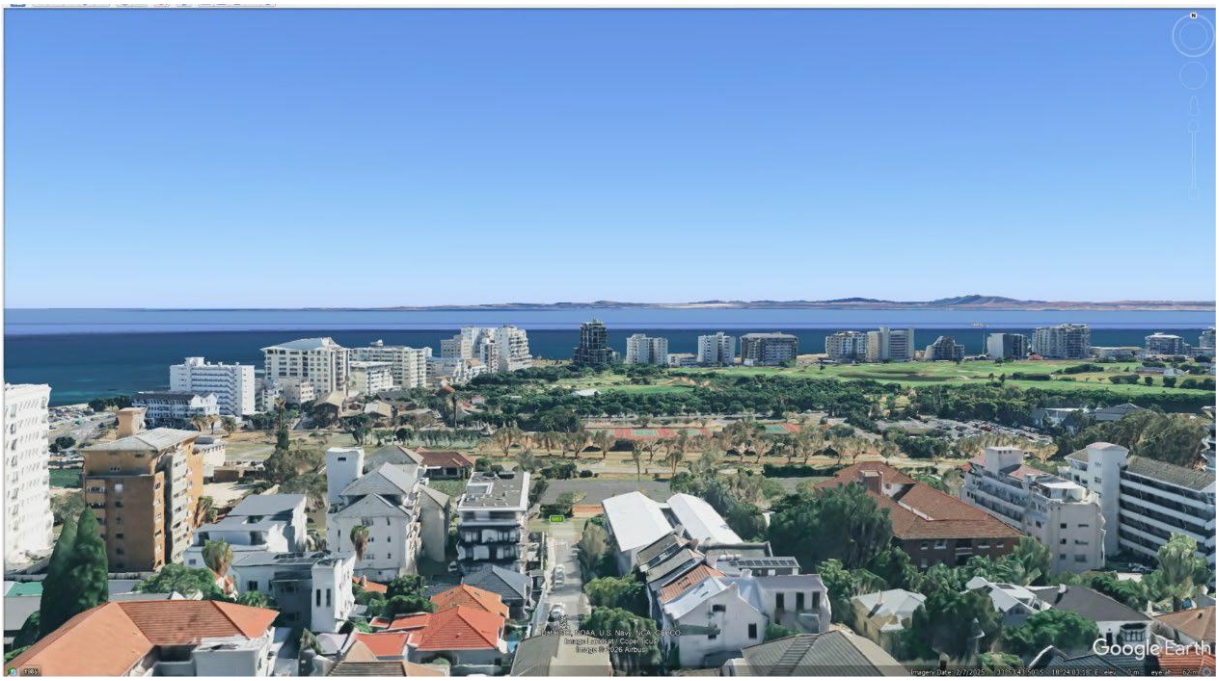


Figure 43: Richmond view corridor

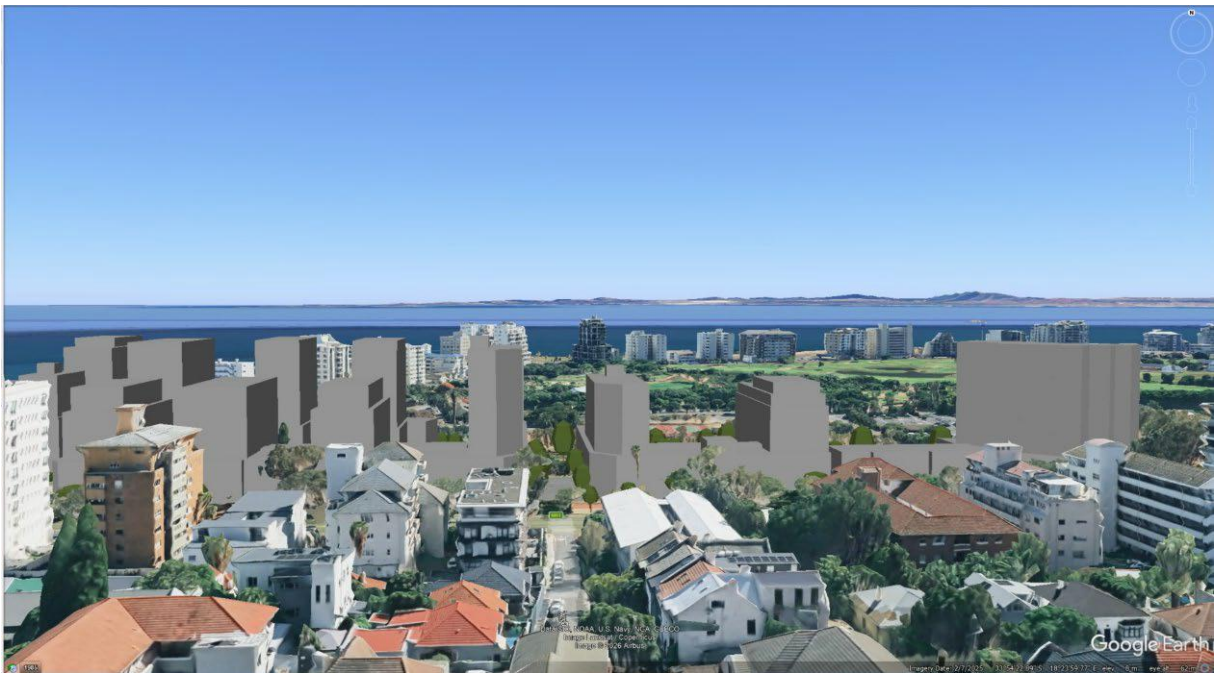


Figure 44: Richmond view corridor with the model of the proposed development showing graduated building heights (extracted from the VIA – Appendix G2)

3. Building Massing

Building massing should remain articulated; fragmented; visually permeable; and compatible with surrounding scale. Continuous megastructure-type forms should be avoided.

Figure 45: Aerial view showing the urban grain surrounding the site

Figure 46: Aerial view showing the urban grain surrounding the site with the model of the proposed development (extracted from the VIA – Appendix G2)

4. Relationship to the Green Point Common

Development facing the Green Point Common should maintain landscaped edges, avoid excessive enclosure, maintain visual openness and provide articulated building forms.

Figure 47: View from Green Point Common onto the site

Figure 48: View from Green Point Common onto the site with the model of the proposed development (extracted from the VIA – Appendix G2)

5. Pedestrian Scale

Development along Main Road should maintain active frontages, articulated façades, pedestrian-scale elements and human-scaled public spaces. Large uninterrupted façade planes shall be avoided.

6. Existing Tree Lines

Retention and reinforcement of the existing tree-lined edge along Main Road will play an important role in filtering views of the development from surrounding residential areas. This vegetated edge contributes to the visual absorption capacity of the receiving environment and

softens the perceived scale of built form along the site boundary. Existing significant trees within and adjacent to the site shall be retained and protected wherever feasible. Development shall not adversely affect tree root zones; tree stability; or tree health. Particular care shall be taken to avoid impacts on trees associated with the Green Point Common and Fan Walk landscape.

7. **Skyline control**

Rooflines should be designed to maintain a coherent skyline and avoid excessive visual clutter. Plant rooms and rooftop structures should be integrated into the architectural design or visually screened. No rooftop structures should materially increase the apparent building height beyond the approved development envelope.

8. **Civic node**

Any vertical additions to the retained civic cluster should be subject to detailed specialist visual and heritage review at the architectural design stage. Any new built form should remain visually subordinate, appropriately setback, and avoid visually dominant rooftop accretions. It should also preserve the legibility of the civic ensemble and avoid compromising its significant heritage-related spatial qualities.

Visual Findings & Conclusion

Based on the viewpoint-based assessment, the proposed concept design has a Low to Medium-low significance overall, and the key visual themes are assessed as follows:

- **Low to Medium** significance for visual corridor views
- **Medium to low** significance for views towards the Green Point Common
- **Low** significance for skyline views
- **Neutral to positive** for streetscape views

The proposal demonstrates a strong response to the visual characteristics of the receiving environment and contributes to the establishment of a coherent urban edge along the Green Point Common. When viewed from the coastal edge, the proposed development will be perceived primarily as part of the background urban layer within an already intensively developed metropolitan corridor (as illustrated in the Figures below). Furthermore, the visual effects of the development are moderated by the infrastructural character of the area, the presence of strong metropolitan movement corridors, the backdrop of Signal Hill, and the graduated massing strategy embedded in the design.

Beyond mitigating potential negative impacts, the proposal introduces a more coherent urban structure that enhances spatial definition and improves the visual legibility of a currently fragmented site situated between two major metropolitan corridors. From both a landscape and urban design perspective, the development represents not only an intensification of land use but also an opportunity for urban consolidation and spatial enhancement within the Atlantic Seaboard corridor.

The development is therefore considered **visually acceptable** within its urban context from both a heritage and landscape perspective, with the overall residual visual impact assessed as **low to medium–low** (acceptable). The VIA further concludes that the proposed development can be accommodated within the Three Anchor Bay landscape **without resulting in unacceptable visual impacts**, provided that the identified visual indicators and associated recommendations are effectively implemented.

Transport Impact Assessment

*The below information has been extracted and summarised from the transport impact assessment (TIA) – **Appendix G4***

A TIA was undertaken for the proposed concept design by Innovative Transport Solutions (ITS) to assess the potential impact of the proposed mixed-use development on traffic and transport operations on the surrounding road network.

Site location

The TIA notes that the site is located in close proximity to numerous established commercial, industrial and mixed-use economic nodes of the City. Opportunities for employment and economic development are therefore easily accessible from the site, and well-established road networks link these nodes, playing an important role in reinforcing transit-oriented corridors. Additionally, the existing road network is well developed with a full hierarchy of road classes in the site vicinity including Helen Suzman Boulevard, Main Road, Three Anchor Bay Road, Beach Road, Vlei Road, Granger Bay Boulevard, Portsood Road, Bill Peters Drive, St Bedes Drive, Richmond Road, Hill Road, St Georges Road, Clyde Road, Grove Road, Pine Road, Wigtown Road, Varneys Road and York Road.

Land use and Traffic Scenarios

The proposed development includes a mix of land uses including affordable housing units, open-market residential units, retail space, offices, two hotels, and community facilities. Multiple development scenarios, reflecting varying extents of these land uses, were assessed to test their transport implications and to ensure that a range of viable development options can be supported. The land use extents for each scenario tested are summarised in the table below:

Table 6: Land use components per scenario (extracted from the 2026 TIA)

Scenario	Retail	Office	Hotel	Community	Affordable housing	Open Market
	GLA*	GLA	Rooms	GLA	Units	Units
1a	8379	1403	325	1355	261	1033
1b					242	949
1c					230	915
2a		13063			214	862
2b					193	801
2c					183	772

*GLA = Gross leasable area

Note: Option 2 (preferred option) in the SEIA is assessed in the TIA and Scenario 2C

Traffic analyses

Given that the proposed development comprises predominantly residential and commercial uses, **traffic generation is expected to follow typical commuter patterns**. The traffic analyses are therefore based on the weekday AM and PM peak hours (a.m. peak hour is 07:45 to 08:45, and the p.m. peak hour is 17:00 to 18:00). These hours represent the most critical periods of interaction between development traffic and existing traffic. Although the Three Anchor Bay area experiences increased traffic during weekends and special events (e.g., stadium events), these conditions are classified as abnormal days and are not representative of typical road network

operations. Accordingly, the use of normal weekday peak periods is considered appropriate and consistent with accepted practice for urban traffic impact assessments.

The following scenarios were analysed:

- 2026 Existing Traffic Conditions (based on the existing recorded traffic volumes)
- 2031 Total Traffic Conditions (2031 traffic volumes plus the development trips for all traffic scenarios)
- 2031 Sensitivity Analyses (2026 existing traffic volumes adjusted with a 1% growth rate per annum over a 5-year horizon period plus the development trips for the wors-case traffic scenario)

Existing Intersection Operations

Study intersections were analysed based on the methods described in the Highway Capacity Manual (HCM) to determine the level of service (LOS)[3], delay per vehicle (in seconds) and volume per capacity (v/c) for each intersection in the peak hours. The results indicate that the following intersections are overall operating at unacceptable levels of service (LOS E/F) or have approaches operating at unacceptable LOS during both peak hours:

- Three Anchor Bay Road/Main Road,
- Three Anchor Bay Road/Beach Road,
- Helen Suzman Boulevard/Beach Road
- Main Road/ York Road

However, by optimising the signal phasing and timings, it is possible to improve the traffic operations at the above-mentioned four intersections to be able to achieve acceptable LOS with minimal average delays during both peak hours. No geometric changes were included. All other study intersections are operating at acceptable LOS during the a.m. and p.m. peak hours (Annexure A of the TIA).

Traffic Growth Rate

Traffic growth rates were assessed by comparing the 2012 and 2025 peak hour counts at the Helen Suzman Boulevard/Granger Bay Boulevard intersection. Based on these growth rate calculations, it is evident that the **traffic growth in this area is low**. The a.m. peak hour traffic volumes remained the same (i.e. 0% growth) while the overall traffic volumes increased with a relatively low rate of 1.4% per annum. Due to these low historic growth rates, it was decided that no background traffic growth rates would be applied.

A sensitivity analyses was however undertaken to test the reliability of the above-mentioned assumption. The purpose of the sensitivity analyses was to confirm that the operational assessment results remain. For the analyses, a 1% per annum growth rate was applied to the existing traffic volumes to represent a conservative increase in base traffic conditions. In addition, the worst-case development trips, Scenario 2A, were included. **The capacity analyses indicated that all study intersections will continue to operate at acceptable LOS during both peak hours.** Refer to Figure A22 and Figure A23 in Annexure A of the TIA (Appendix G4) for a summary of the 2031 total traffic conditions of the study intersections.

[3] ranging from A (best/free-flow) to F (worst/forced-flow)

Approved development/latent rights and future roadways

There are several developments proposed in the broader vicinity of the site, however **these developments are not expected to have a significant traffic impact in the site vicinity during the weekday peak hours**. Therefore, these trips were not included in the analyses.

Figure 49: Approved surrounding future developments (extracted from the TIA)

Future planning in the broader site context includes the completion of the Foreshore Freeway, although there is currently no confirmed timeline for that project.

Figure 50: Future road network (extracted from the TIA)

Site Access & Proposed Future Site Accesses

The site is accessible and well-located within the metropolitan area with the study area serviced by two higher order roads (Helen Suzman Boulevard and Main Road). These contribute to good connectivity in an east-west directions to and from the site. **The civic node accommodating the existing civic centre, library and crèche, will retain its two current left-in and left-out (LILO) accesses**. No changes are proposed to these accesses. Both have a two-lane cross-section, with one inbound and one outbound lane, and are stop-controlled on the development side.

Along Main Road, three new accesses are proposed. The primary site access will be positioned opposite Richmond Road and is proposed to be signalised. This access will have one lane per direction. In addition, two priority stop-controlled accesses are proposed along Main Road, one opposite St Bedes Road and one opposite Hill Road. Each access will have a two-lane cross-section with one lane in each direction and be stop-controlled on the development side. The access opposite Hill Road will serve the hotel exclusively.

The latest Concept Design retains the two existing accesses along Helen Suzman Boulevard. It is proposed that these accesses be upgraded to one left-in-only access and one left-out-only egress to improve operational efficiency and safety. The focus was on optimising the available spacing for these accesses. Therefore, it is proposed that the site have one left-in access approximately 320 m east of the Helen Suzman Boulevard/Beach Road intersection and one left-out egress approximately 140 m east of the intersection. In addition, the existing median break will be closed to support the revised access configuration.

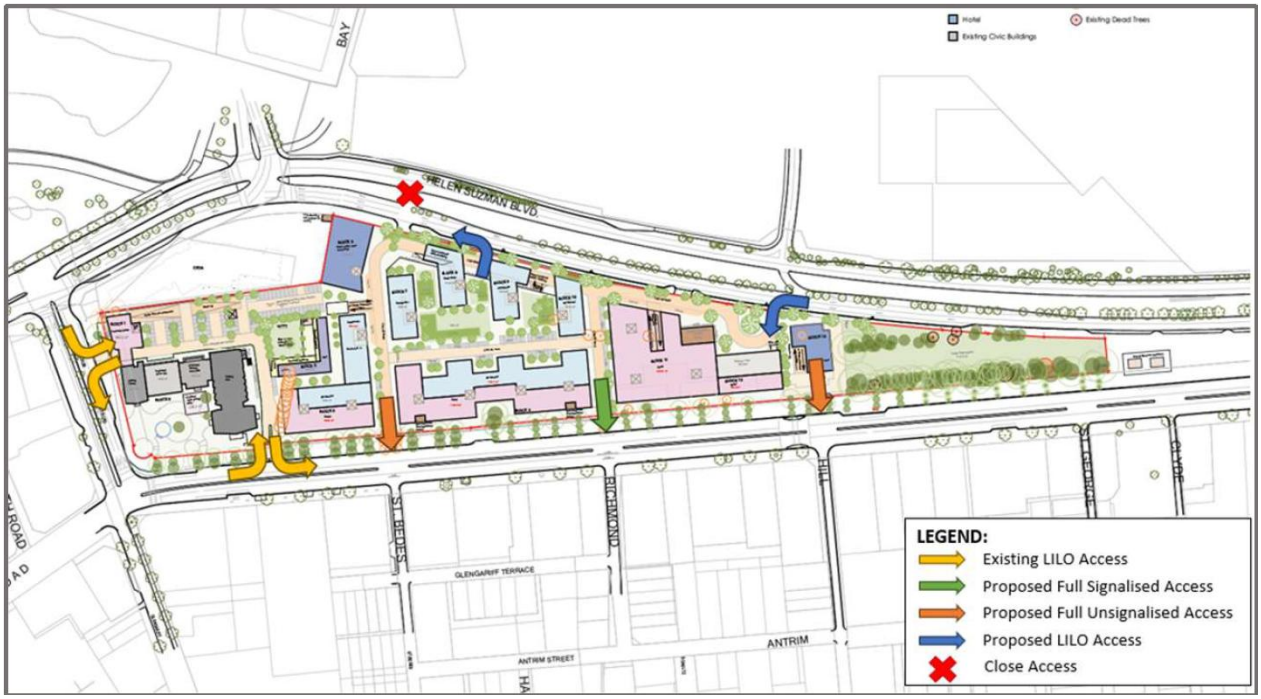


Figure 51: Proposed future site accesses

Access spacing requirements have been considered and are described in the TIA on pages 12 and 13.

Queue analysis

To ensure that no queues form during the peak hours, it is proposed that all access gates be left open during the operating hours of the retail space, offices, hotel and community facilities.

Carriageway crossings
All proposed accesses must have a carriageway crossing width of between 2.4 m and 8.0 m (CoCT, 2025).

Trip Generation & Development Trips

The additional vehicle trips that will be generated by the proposed development was calculated using the trip rates as provided in the TMH17 South African Trip Data Manual (COTO, September 2013). It is expected that a percentage of the development trips will be internal. These are vehicle trips between the different land uses on the site. Hence, **not all vehicle trips generated by this development will be distributed to the external road network**. The proposed development is located in an area well served by public transport (minibus taxis, MyCiTi buses and GABS buses) that has been identified as a PT2 zone. PT2 zones are areas where the use of public transport is promoted, and the City considers the provision of public transport as good, or the use of private vehicles is very limited. Refer to the TIA for details about the trip generation rates

The following should be considered when interpreting the trip generation for the proposed concept design:

- Mixed-use developments are defined as developments in an area that consists of two or more single-use developments between which trips can be made using non-motorised transport, thereby reducing vehicle trip generation in the surrounding area. The transit reduction factors are applicable to developments located within reasonable walking distance from a major transit node or stops on a major transit corridor, such as this proposed development.
- Transit nodes or corridors include developments that are located within a reasonable walking distance from a major transit node or stops on a major transit corridor. These areas experience an associated transit reduction factor.

Considering the calculated trip reduction percentages, the peak trip generation associated with the proposed concept design during peak hours is shown in the Table below. Refer to **Annexure C** in the TIA (Appendix G4) for detailed trip generation calculations. **Note that Scenario 2A generates the most trips whereas Scenario 1C generates the least new trips**

Table 7: Expected Peak Hour Trips for Each of the Scenarios (extracted from the 2026 TIA)

Scenario	Weekday AM Peak Hour			Weekday PM Peak Hour		
	Total	In	Out	Total	In	Out
1A	776	261	515	952	595	357
1B	728	249	479	904	561	342
1C	**706**	244	462	**882**	546	336
2A	**882**	412	469	**1058**	565	492
2B	843	403	441	1019	538	481
2C	825	398	427	1001	526	475

Note that no reductions have been applied to account for potential short-term rental or holiday accommodation use, and that Option 2 in the SEIA is assessed in the TIA and Scenario 2C.

It was assumed that the proposed development will exhibit a similar directional distribution of trips during the peak periods, given the comparable land use context and location within the broader area. The trip distribution used is shown below

Figure 52: Trip distribution surrounding the site (extracted form the TIA)

Public Transport Assessment

The main road-based public transport routes currently run along Helen Suzman Boulevard and Main Road with minibus taxis, GABS buses and MyCiti buses, therefore the proposed development will be well located to access various forms of public transport (refer to pages 16 and 17 of the TIA for the minibus taxi, bus,railway and MyCiti routes).

There will be employment opportunities within the development land uses that will generate public transport, pedestrian and cycling trips. To calculate the associated trip generation the worst-case scenario, from a traffic perspective, was used.

A number of factors, such as the current patterns, existing and future public transport facilities, private transport infrastructure and the proposed land uses and densities, influence the likely modal split between private and public transport modes (including walking). Taking these factors into account, it was assumed that all land uses will have a 60% modal split in favour of public transport. It was assumed that **80% of all public transport users will make use of MyCiti**. The remaining 20% will walk. The same secondary modal split was applied to all land uses.

Number of public transport trips generated

Each MyCiti bus can accommodate approximately 65 passengers. Assuming 50% inbound and 50% outbound directional split, the proposed development is expected to generate the following public transport trips during the peak hours:

- Lower person trip generation rates: 10 bus trips (5 in, 5 out)
- Higher person trip generation rates: 14 bus trips (7 in, 7 out)

Provision should be made to accommodate the additional public transport demand that will be generated by the site. Therefore, the demand determined should be used by the City to inform future public transport planning, including the assessment of MyCiTi service capacity and potential service adjustments within the site vicinity. Full details of the public transport and pedestrian trip generation calculations are included in Annexure C of the TIA (**Appendix G4**).

Non-motorised Transport (NMT) Assessment

The site's position makes it possible to create a landscaped, NMT-friendly area that connects the development to the nearby NMT network. For example, Helen Suzman Boulevard and Main Road are classified as Class 2 cycle routes near the subject property. It is recommended that:

- The proposed development should provide sidewalks along the frontages of the site that tie in with the existing network of sidewalks.
- The design of the proposed development layout should support NMT inclusion since a significant number of pedestrian and bicycle trips are likely to be generated by the future development, for which adequate infrastructure should be provided where necessary.
- The internal road network should also include pedestrian and bicycle facilities.

The following number of pedestrians are likely to be generated by the proposed development:

- Lower person trip generation rates: 142 pedestrians
- Higher person trip generation rates: 211 pedestrians

Total traffic conditions:
The capacity analyses indicated that all study intersections will continue to operate at acceptable levels of service during both peak hours for each of the trip generation scenarios (Figure A10 and A21 in Annexure A of the TIA show the 2031 total traffic conditions of the study intersections).

Parking

The proposed development's parking needs should adhere to the guidelines provided in the Municipal Planning Amendment By-law (CoCT, 2025). Since the existing parking in the civic node of the concept design will remain as is, these land uses were therefore not included in the parking calculations for the site.

The site is located within a **PT2 zone where the use of public transport is promoted**. While the development aims to align with Transit Orientated Development (TOD) principles and reduce reliance on private vehicles, **some level of on-site parking remains necessary to accommodate demand**. A complete absence of parking could lead to spillover effects on the surrounding road network, which may negatively impact traffic flow and local accessibility. It is recommended, to support efficient land use and TOD goals, parking provision should be market-related and complemented by shared parking strategies between complementary land uses (e.g. daytime retail and nighttime residential uses), ensuring flexibility and efficiency within the broader development framework. **It is therefore proposed that the parking ratios for PT1 zones should be implemented for the proposed concept design instead of PT2 zone.**

Table 8: Parking Requirements (Extracted from TIA)

Land Use	PT Zone		
	Standard Areas	PT1	PT2
Flats	1.25 bays per dwelling unit plus 0.25 bays per dwelling units for visitors	1 bay per dwelling unit plus 0.25 bays per dwelling unit for visitors	Nil

Affordable housing	0.8 bays per dwelling unit plus 0.2 bays per swelling unit for visitors	0.5 bays per dwelling unit plus 0.15 bays per dwelling unit for visitors	Nil
Office	4 bays per 100m² GLA	2.5 bays per 100m² GLA	Nil
Shops (excluding supermarket)	3 bays per 100 m² GLA	2 bays per 100 m² GLA	Nil
Supermarket	4 bays per 100 m² GLA	2.5 bays per 100 m² GLA	
Hotel	0.5 bays per bedroom, plus associated reduced (based on parking sharing) requirement for any ancillary land uses open to public	0.5 bays per bedroom, plus associated reduced (based on parking sharing) requirement for any ancillary land uses open to public)	Nil
Library	2 bays per 100 m² floor space	1,5 bays per 100 m² floor space	Nil
Place of assembly	1 bay per 6 seats or persons, calculated at 1,4 m² floor space = 1 person	1 bay per 8 seats or persons, calculated at 1,4 m² floor space = 1 person	Nil
Creche	Nil. Facilities with more than 34 learners must be able to accommodate an informal stop and drop facility on-street.		

Based on the table below, a **up to 2011 parking bays could be required** for the proposed development (for the worst-case: Scenario 2A). Parking has been accommodated within the proposed concept design within a three-level super basement structure. According to the TIA, preliminary investigations indicate that **the proposed super basement can accommodate up to approximately 1895 parking bays**, and additional 80 bays on the ground level, **totalling 1975 bays**. This parking supply is sufficient to accommodate all assessed scenarios, with the exception of Scenario 2A. While Scenario 2A exceeds the PT1parking requirement, the site is located within a PT2 zone, where no minimum parking requirements apply. Furthermore, the mixed-use nature of the development will facilitate shared parking opportunities, reducing overall parking demand. **Accordingly, the proposed parking provision is considered adequate to support the development.**

Locating parking within a basement structure, rather than at ground level, optimises land use efficiency, and supports a more NMT-friendly urban environment. Parking spaces designated for people with disabilities should be placed as close to accessible building entrances as possible. Details of the parking calculations are included in **Annexure D** of the TIA (**Appendix G4**).

Table 9: Parking Bays Required for Each Scenario (Extracted from the 2026 TIA)

Scenario	Total Parking Bays Required	Disabled Bays Required	Loading Bays Required
1A	1964	22	3
1B	1847	21	3
1C	1796	20	3
2A	2011	23	4
2B	1921	22	4
2C	1879	21	4

Note: Option 2(preferred option) in the SEIA is assessed in the TIA and Scenario 2C

Conclusions & Recommendations

- Improved intersection operation by **optimising signal phasing and timings** at the Three Anchor Bay, Main Road, Beach Road, Helen Suzman and York Road intersections, **after which no capacity constraints are expected, and spare capacity will be available**. No geometric changes are required.
- The remaining study intersections are currently operating at **acceptable LOS with spare capacity** during both peak hour and no upgrades are proposed.
- No capacity constraints in terms of traffic conditions are expected in any of the scenarios assessed, and all study intersections will continue to operate at acceptable LOS with the additional site generated traffic added to the network. No upgrades are proposed.
- The **existing two LILO accesses to the public library**, the civic centre and the crèche along Three Anchor Bay and Main Road **will remain unchanged** and continue to provide access.
- **Three accesses are proposed along Main Road**, located opposite Richmond Road, St Bedes Road and Hill Road. The Richmond Road access will be signalised and have one lane per direction. The remaining two accesses will be stop-controlled on the development side and have one lane per direction. The Hill Road access will only provide access to the hotel component of the development.
- It is proposed that **the two existing accesses along Helen Suzman Boulevard be reconfigured onto a left-in only access and a left-out only egress, with improved spacing**. The left-in access is located approximately 320 m east of Beach Road, while the left-out egress should be located approximately 140 m east of the intersection.
- To prevent queues from forming at the access points, it is proposed that **all access gates be left open during the operating hours of the facilities**.
- The proposed development can potentially generate between 10 bus trips (5 in, 5 out) and 14 bus trips (7 in, 7 out) during the peak hours. **Provision should be made by the city to accommodate the additional public transport demand** that will be generated by the site.
- **Sidewalks must be provided along the frontage of the site and tie into the existing sidewalks**.
- **Pedestrian and cycle facilities should be provided along the internal road network**.
- It is also proposed that the **parking rates provided for PT1 zones should be applied** instead of the required PT2 zone parking requirements.

It is concluded that the **expected transport related impacts of the proposed development can be sufficiently mitigated, provided that the above proposals are in place**. It is recommended that the proposed development can be approved from a transport impact perspective.

Socio-Economic Impact Assessment

The below information has been extracted and summarised from the socio-economic impact assessment (SEIA) – ***Appendix G3***

Refer to Section G of this report for a summary of the socio-economic context surrounding area, and more details can be found in the SEIA.

Summary of findings

The proposed mixed-use development on Erf 2187, Three Anchor Bay, Green Point, through its construction and post-construction, is anticipated to result in both positive and negative socio-economic impacts (Urban Econ, 2026). According to the SEIA, **the net positive impacts associated**

with the proposed project would outweigh the net negative impacts. The positive impacts include significant economic benefits, such as increases in GDP and creation of employment opportunities, as well as socio-economic benefits such as increased housing availability and enhanced civic activity. The negative impacts associated with the proposed development are primarily local in nature, including effects on traffic flow, sense of place for nearby residents and recreational activity on the site. These impacts would affect a significantly smaller number of people than the net benefits that would be derived from the proposed development.

The table below summarises the socio-economic gains and losses that are expected to result from both the construction and the operation of the proposed development:

	Positive	Negative
Construction	• GDP and production • Employment • Household income • Government revenue • Skills development	• Traffic congestion • Sense of place (visual) • Noise, dust and pollution • Access to civic activities & services • ECD centre
Post-construction	• GDP and production • Employment • Household income • Government revenue • Skills development • Access to civic facilities & services • Housing availability and affordable housing • ECD care	• Traffic flow • Sense of place (visual) • Recreational activity

Construction-related impacts

The comparison of gains and losses associated with the construction phase of the project indicate that economic indicators i.e., GDP, employment, household income and government revenue are expected to experience positive effects. This indicates that from a purely economic standpoint, the project's construction would be beneficial to the local and regional economies. The main trade-offs during the construction phase would be the social impacts experienced by the surrounding community, particularly with regards to traffic congestion, visual disturbance and noise, dust and air pollution, as well as temporary disruption to civic facilities. Overall, the positive impacts on the economy are seen to outweigh the negative social effects in relation to the construction of the proposed development.

Post-construction-related impacts

The post-construction phase of the proposed development will also result in benefits to the local and regional economies. Though not to the same scale as the construction phase, it will have positive impacts on GDP, employment, household income and government revenue. Additionally, it will improve housing availability in the area – including of affordable housing – and enhance existing civic activities. These benefits will be long-term. As is the case for the construction phase, the negative impacts of the operational phase will be limited to the immediate surroundings of the

site, with the potential exception of the cumulative impacts of increased traffic. Overall, the positive impacts associated with the proposed development exceeds the negative effects.

Policy Overview

The proposed development is aligned with national, provincial and local policies that support urban regeneration and economic growth. Nationally, policies like the National Development Plan 2030 and the Integrated Urban Development Framework (IUDF, 2016) aim to reduce poverty, address inequality, and promote urban integration through mixed-use developments that boost economic opportunities and improve accessibility. At a provincial level, the Western Cape Provincial Strategic Plan 2025-2030 and Spatial Development Framework (2014) focus on spatial integration, job creation, and sustainable development, aligning with the proposed development's goals of affordable housing and urban revitalisation. Locally, the City of Cape Town Municipal Spatial Development Framework (2023) and the Table Bay District Plan (2023) support these objectives by promoting land use intensification and the development of integrated communities with access to public transport and job opportunities.

The following socio-economic impacts have been identified, for both the construction and post-construction phases of the proposed development:

Table 10: Socio-economic impacts

Construction Impacts	Post-construction Impacts
1. **Temporary increase in production and GDP (in national and local economy)**	1. Sustainable increase in production and GDP (in national and local economy)
2. **Temporary impact on employment**	2. Sustainable employment
3. **Temporary increase in household income**	3. Sustainable increase in household income
4. **Temporary increase in government revenue**	4. Sustainable increase in government revenue
5. **Temporary impact on skills development**	5. Impact on skills development
6. **Temporary impact on traffic congestion**	6. Impact on traffic flow
7. **Temporary impact on sense of place (visual)**	7. Impact on sense of place (visual)
8. **Temporary impact on noise, dust and air pollution**	8. Impact on land value
9. Temporary impact on access to civic facilities and services	9. Impact on access to civic facilities and services
10. Temporary impact on ECD centre	10. Impact on ECD care
	11. Impact on recreational activity
	12. Impact on housing availability and affordable housing

These impacts have been detailed and assessed in the Impact Assessment Tables in Section H of this BAR.

The various respective mitigation measures for the impacts identified above can be found in the Impact Assessment (Section H) and in Section I.2 below.

Conclusion and Recommendations

The proposed development is expected to generate a range of both positive and negative socio-economic impacts during both the construction and post-construction phases. Overall, the **net**

positive impacts are viewed to **outweigh the net negative impacts**, which are largely localised. Positive impacts include the stimulation of the local economy, as well as increased housing availability and enhanced civic activity. From a socio-economic perspective, no fatal flaws have been identified for the proposed development. While the 'no-go' alternative would avoid some negative impacts, it would also result in the forfeiture of significant contributions to economic activity as well as the associated socio-economic benefits. The specialist reports included in this study – specifically the TIA and VIA – have concluded that the proposed development falls within acceptable levels of impact on traffic levels and visual resources respectively.

In conclusion, **the proposed development is considered to be acceptable and is recommended**, subject to the implementation of the proposed mitigation and enhancement measures. These measures are essential to ensure that the potential socio-economic benefits associated with the proposed development are realised inclusively and sustainably and that the risks of exclusion, displacement and inequality are adequately addressed.

2.	List the impact management measures that were identified by all Specialist that will be included in the EMPr

Heritage Impact Assessment

Given the nature and significance of the heritage resources identified, the following mitigation measures have been identified (see section 6 of **Appendix G1** - HIA for more details):

- The Colin Eglin Library and Sea Point Civic Centre:
  - » Retaining the library and civic centre is regarded as a non-negotiable for the proposed redevelopment of the site.
  - » Maintenance and the resolution of issues such as rainwater drainage is required and this should be undertaken under the supervision of a heritage architect with suitable experience in modernist buildings.
  - » The conversion of the minor hall into a different kind of public space must be undertaken by a heritage architect with suitable experience in modernist buildings. In this regard it is important that the underlying structure/programme of the building is respected.
  - » The proposed separation of the reading room from the library is potentially problematic as this space is regarded as an integral part of the library, architecturally and in terms of use. This proposal should be revisited as an integral project to undertake alterations and additions to the Civic Centre Complex, as informed by a heritage architect with suitable experience in modernist buildings. Any such proposals should be submitted to HWC for approval, and subject to public consultation.
  - » Any extension should be accomplished by the use of light-weight gasket structures, using a simple contemporary architectural language that will not compete with the original buildings. As above any such work should be undertaken by a heritage architect with suitable experience in modernist buildings.
  - » Only lightweight new structures should be allowed in the forecourt. The design of such structures should be cognisant of the original landscaping design and should not compete with the building complex. Low, unroofed structures are preferred with the use of removable structures for shelter (e.g., umbrellas).
- Retention of other buildings/structures on the site:
  - » The electrical substation should be recorded as an example of an industrial building of its period.

    - » Where possible all memorabilia of the bowling clubs should be preserved and handed over to remaining clubs in the area, that have absorbed the members of these clubs.
- Retention of the eucalyptus trees and tree lines:
    - » The proposal includes the retention and protection of the eucalyptus tree avenue on the eastern portion of the site, recognising its heritage significance and ensuring its conservation as a key historical landscape element.
    - » Tree loss should be minimised as far as possible and offset through the implementation of a comprehensive landscaping plan, aimed at softening the visual impact of the proposed development.
    - » In addition, the development will be setback from the Main Road boundary to ensure that the trees planted close to this boundary is not affected.
- Additional mitigation measures associated with contextual indicators include:
    - » Retaining key view lines through the site and adjusting the placement and orientation of the proposed hotel building to accommodate and preserve these views.
    - » Ensuring an appropriate built form, scale and massing that responds to the surrounding context, with building heights aligned to the area and architectural articulation reflecting the existing urban grain.
    - » The development of the site should be subject to strict urban design guidelines that will enforce architectural variation and articulation of elevations and roofscapes, including articulation of podium block interface with Main Road. Along Main Road, building heights should vary between 30m and 35m, with taller buildings possible at key points. But 45m maximum building heights would be appropriate along the Helen Suzman edge.
    - » The application of the Urban Design Guidelines at SDP stage will require confirmation that the heritage indicators have been sufficiently taken into account. This should be included as a condition of approval.
    - » Incorporation of active street frontages along Main Road to enhance streetscape vitality and pedestrian engagement.
    - » Protection and retention of the existing contemporary tree landscape along Main Road.
    - » Provision of a landscaped interface along Helen Suzman Boulevard to soften the infrastructural edge and improve visual integration.

Visual Impact Assessment

It should be noted that the mitigation measures identified in the visual impact assessment are largely embedded within the development concept itself in order to reduce visual impacts. Mitigation measures include:

- Retention of the four identified visual corridors (St Bede's Road Corridor, Hill Road Corridor, Clyde Road Corridor and Wigtown Road Corridor). Corridors which should:
    - » Remain visually open;
    - » Maintain a minimum visual width of approximately 10m;
    - » Align with the surrounding street network; and
    - » Remain free of continuous built form.
- Articulated building massing, ensuring that the built form remains fragmented, visually permeable and compatible with the surrounding scale, while avoiding continuous megastructure-type developments.

- A graduated building height strategy, with heights generally ranging between 30-45m along Main Road and the Common, and up to 45m along Helen Suzman Boulevard. Selective height accents may be permitted at appropriate locations, while uniform building heights should be avoided.
- Sensitive interface with the Green Point Common, including landscaped edges, limited enclosure, maintained visual openness and articulated building forms.
- Active and pedestrian-oriented Main Road interface, incorporating active frontages, articulated façades, pedestrian-scale elements and well-defined human-scaled public spaces.
- Where development interfaces directly with retained civic or heritage buildings, the following visual indicators should apply.
    - » Retained civic buildings must remain visually legible as primary heritage elements, rather than being visually subordinated by new additions;
    - » Additional bulk above retained heritage structures should read as visually recessive, lightweight, understated, and subordinate to the host structure;
    - » Where feasible, additional floors should be materially setback from principal façades and roof edges to reduce visual dominance and preserve the original architectural reading;
    - » Interventions should avoid reading as arbitrary or heavy rooftop additions;
    - » Development should not compromise the legibility or openness of the civic forecourt, public gathering spaces, or key spatial relationships between civic buildings;
    - » Compatibility does not require mimicry, but requires coherent proportional, material, and compositional dialogue;
    - » Comparable precedent should be drawn from interventions where contemporary additions are demonstrably recessive and spatially integrated, rather than visually dominant or formally alien;
    - » Where architecturally significant internal volumes or roof forms exist, interventions requiring structural compromise should be approached with caution.

Transport Impact Assessment

The transport impact assessment recommended the following mitigation measures:

- Improved intersection operation by optimising signal phasing and timings at key intersections, including Three Anchor Bay Road/Main Road, Three Anchor Bay/Beach Road, Helen Suzman Boulevard/Beach Road and Main Road/York Road, to improve the traffic flow and operations at these intersections. No capacity constraints are expected once the traffic signals have been optimised and spare capacity will be available.
- Retention of the existing two left-in/left-out (LILO) access points along Three Anchor Bay Road and Main Road to continue to provide access to the public library, the civic centre and the crèche.
- Provision of three access points along Main Road, located opposite Richmond Street, St Bedes Street and Hill Street.
- Signalisation of the Richmond Street access, with one lane per direction, while the St Bede's Street and Hill Street accesses will be stop-controlled on the development side, also with one lane per direction. The Hill Street access will be restricted to provide access to the hotel component of the development only.

- Reconfiguration of the two existing access points along Helen Suzman Boulevard into a left-in-only access and a left-out-only egress, with improved spacing to enhance safety and traffic flow.
- Ensuring that all access gates remain open during operational hours of the facilities, to minimise congestion and delays.
- Provision for increased public transport demand, in line with the site's location within a PT2 Zone.
- Sidewalks must be provided along the frontage of the site and tie into the existing sidewalks.
- Pedestrian and cycle facilities should be provided along the internal road network.
- Application of PT1 Zone parking rates to the development, despite its location within a PT2 Zone, where most land uses are not required to provide on-site parking.

It is concluded that transport-related impacts associated with the proposed development can be efficiently mitigated through the implementation of the above measures.

Socio-economic Impact Assessment

The socio-economic impact assessment includes various positive and negative impacts. The positive impacts can be enhanced, and negative impacts mitigated. The following measures are recommended to either enhance positive or mitigate negative impacts in the SEIA:

Positive impacts to be enhanced:

- **Temporary impact on GDP and production**: The developer should encourage the contractor to utilise labour from surrounding communities to maximise the benefit to the local economy; encourage the contractor to procure construction materials from local suppliers where feasible.
- **Temporary impact on employment**: Prioritise labour sourcing from the broader Cape Town, including historically disadvantaged areas with high unemployment (e.g. Cape Flats). Sub-contractors should be local SMMEs and BBBEE compliant enterprises wherever feasible. Employment of labour-intensive construction methods where feasible.
- **Temporary impact on household income:** Prioritise labour sourcing from broader Cape Town, including historically disadvantaged areas with high unemployment (e.g. Cape Flats). Where possible, the use of labour-intensive construction methods and local SMME suppliers.
- **Temporary impact on skills development:** Contractors should employ workers from surrounding communities where feasible, to enhance local economic impact. Labour-intensive construction methods should be utilised where possible, and include the employment of youth and entry-level workers to support skills pipeline development.
- **Sustained impact on GDP and production:** Operators of the development should prioritise local procurement practices for the sourcing of materials as well as the hiring of staff and contracting of services as far as feasible to maximise local economic benefits.
- **Sustained impact on employment, household income and skills development:** Operators of the development should hire employees from local communities where feasible to create maximum benefits for local employment. Efforts should be made to sub-contract to local companies, particularly SMMEs and BBBEE compliant enterprises, where feasible.
- **Sustained impact on ECD care:** Ensure that the ECD facility is purpose-built and designed to meet current operational and regulatory requirements, including adequate indoor and outdoor space.

- **Sustained impact on access to civic facilities and services:** Ensure that the facility upgrades are aligned with the needs of the community and serve to improve the functioning and longevity of the civic infrastructure.
- **Sustained impact on housing availability and affordable housing:** Inclusion of a requirement for development of affordable housing within the development rights/conditions, at minimum of 20% as per the development concept.

Negative impacts to be mitigated:

- **Temporary impact on traffic congestion:** Implement a Construction Traffic Management Plan aligned with TIA recommendations, restrict movement of construction vehicles to off-peak hours, and provide clear pedestrian management and safety measures around the site.
- **Temporary impact on sense of place:** Compliance with standard construction management practices (including site housekeeping, material storage control and appropriate screening where required).
- **Temporary impact on noise, dust and pollution:** Comply with policies regarding noise and dust regulation methods close to roads and residential areas, conduct noisy construction activity during weekdays, when it will be minimally disruptive to surrounding residents.
- **Temporary impact on the ECD centre:** Ensure that no demolition of the existing ECD facility occurs until a suitable, compliant and operational temporary facility has been secured. The temporary facility should be located, where possible, within the broader area to minimise disruption to access for existing users.
- **Temporary impact on access to civic facilities and services:** Implement phased construction such that portions of the library can remain open and usable insofar as is feasible and safe. Development and implementation of a management plan to manage and reduce impacts where possible. Communicate clearly with users regarding access, closures and alternative arrangements.
- **Sustained impact on traffic flow:** Development should be well integrated with public transport and non-motorised transport infrastructure. Optimisation of signal phasing and timings at surrounding intersections, as per the TIA. All access gates to remain open during operating hours of retail, hotel, office and community land uses to prevent queuing during peak hours, as per TIA.
- **Sustained impact on sense of place (visual):** Maintain compliance with VIA design guidelines (height, gradation, visual corridors, permeability). Consider shading and visual interface treatment along sensitive edges (e.g. Main Road).

Stormwater Management Plan

A stormwater management plan (SWMP) was compiled by EAS Infrastructure Engineers, 2026 (**Appendix L3**). The following recommendations have been extracted and summarised from the SWMP, and included in the EMPr where appropriate:

- The redevelopment of Erf 2187, Three Anchor Bay requires a treatment-focused stormwater strategy since the attenuation of storms greater than 1 year is not required due to the site's immediate proximity to the Atlantic Ocean which was confirmed during discussions with the City of Cape Town.
- The existing municipal stormwater pipelines transversing the site must be relocated into the surrounding road reserves to protect the infrastructure and accommodate the proposed building footprint.
- The proposed conceptual stormwater strategy combines the use of green roofs, rainwater harvesting, pretreatment zones, lined grassed swales, and engineered podium

bioretention/bioswales area which also meets the municipality's pollutant removal performance outcomes (≥80% TSS, ≥45% TP for brownfield sites).

- If any part of the stormwater infrastructure is maintained by the City of Cape Town, servitudes and formal access rights will be required in accordance with the Stormwater Management By-law (2005).
- All invert levels, freeboard, grades and hydraulic connectivity need to be confirmed during detailed design.
- The City of Cape Town requires all brownfield developments to plan and design stormwater systems using Water Sensitive Urban Design (WSUD) and Sustainable Urban Drainage Systems (SUDs) to improve runoff quality, control quantity and encourage groundwater recharge where appropriate.
- The following stormwater maintenance guidelines needs to be implemented to ensure the long-term functionality of Sustainable Urban Drainage (SUDs):
    - Each grid inlet needs to be inspected and cleared of any buildup of silt, litter, or rubble that may impede the clear flow of water into the inlet.
    - Piped systems need to be checked in a systematic way to ensure they are clear of any obstructions and are able to flow at their full capacity. Any buildup of silt or other obstruction is to be removed by hand or by jetting.
    - Grassed swales are to be inspected every three months and mowed if required.
    - Green roofs are to be inspected on a monthly basis during the first year and thereafter quarterly inspections.
    - Quarterly inspections to clean gutters, screens and remove sediment build-up in the tank sump if visible.
    - Monthly gravel inspections for the first year and thereafter quarterly inspections.

3.	List the specialist investigations and the impact management measures that will **not** be implemented and provide an explanation as to why these measures will not be implemented.

No impact management measures were recommended that will not be implemented.

4.	Explain how the proposed development will impact the surrounding communities.

The proposed concept design is anticipated to result in a mixture of positive and negative impacts on the surrounding communities, although it is of the specialists and EAP's opinion that the negative impacts can be adequately mitigated and that the anticipated positive impacts provide ample motivation for the proposed development.

Due to the nature of this project, in an urban environment on an already transformed site with no significant environmental concerns, all of the impacts assessed in this report assess the impact of the development on people / surrounding communities. This includes visual, heritage, socio-economic and transport impacts for both the construction and post-construction phase. The negative impacts on the surrounding communities during the construction phase are temporary, including noise, vibration, dust, traffic and visual nuisance. These impacts are typical of construction and can be mitigated and managed as set out in the environmental management programme. Additionally, access to civic facilities and services and ECD may be impacted during construction. The details of these impacts are described in Section H above, but the key impacts on surrounding communities have been summarised below. Please refer to the Section H of this report and the EMPr (**Appendix H**) for the associated detailed mitigation measures.

Transport impacts

- Some traffic and congestion may occur during the construction phase of the development associated with the movement of construction vehicles to and from the site.

- The existing road network is well developed with a full hierarchy of road classes in the site vicinity. The site is also located in close proximity to various public transport amenities. According to the TIA, the proposed concept design is not expected to result in unacceptable traffic or transport impacts, and intersection operations could be improved by optimising the signal phasing and timings.
- No capacity constraints interns of traffic conditions are expected in any of the scenarios assessed, and all study intersections will continue to operate at acceptable LOS with the additional site generated traffic added to the network. No upgrades are proposed.
- The TIA also notes that the completion of the Foreshore Freeways is planned, but there is no confirmed timeline for this completion yet.

Heritage impacts

- The HIA addresses the socio-historic, architectural and aesthetic significance resources on the site in relation to the proposed concept design. The Colin Eglin Library and Sea Point Civic Centre were identified to have architectural and social significance, and the proposed concept includes the retention (and upgrade where feasible and appropriate) of these facilities on the site. The HIA also notes that the site contributes to the context of the area in terms of green space, views over the site and interface with the main road.
- The site once formed part of the Green Point Common and has a long history of use for recreation purposes but is important to note that the bulk of the site was not accessible to the general public when it was effectively privatized by bowling clubs since the early 20th Century. Although the site may have been considered a visual amenity in the past, the neglect of the former bowling greens and infrastructure on the site has resulted in a loss of this visual amenity. Nonetheless, the proposed concept design would result in the loss of this former green open space.
- The proposed concept will impact the sense of place of the site and heritage significance of the urban landscape, although the appropriate massing and articulated architecture largely mitigates this impact.

Visual impacts

- The VIA identified four key themes for consideration: the retention of visual corridors, the relationship of the development to the Green Point Common landscape, the proposed building height strategy, and the resulting skyline composition. These themes all visually impact the surrounding communities, and the proposed concept design has been developed with these indicators in mind.
- Residents represent high-sensitivity receptors due to prolonged exposure, expectations of visual quality, and proximity to the site. In this instance, while the proposed development will alter certain existing views, particularly from adjacent residential properties, these changes are localised and are moderated through the proposed design response, including articulated massing, retention of visual corridors, and a graduated height strategy. As demonstrated in the viewpoint-based assessment, the development does not result in a continuous or visually dominant barrier and maintains a permeable relationship between the urban fabric and the Green Point Common.
- The proposed development demonstrates a high degree of compatibility with the receiving environment and is capable of being accommodated without unacceptable visual impact. The architectural massing model demonstrates a strong response to the visual indicators. The proposal reflects the fragmented and incremental urban grain characteristic of Three Anchor Bay and avoids the appearance of a continuous or

monolithic development. The development therefore integrates visually with the surrounding neighbourhood while establishing a coherent urban edge to the Green Point Common.

Socio-economic impacts

The utilisation of a currently underutilised and transformed site through a mixed-use development that includes commercial and retail uses at ground level and formalised public spaces is anticipated to positively affect the immediate area, long-term. The various positive and negative impacts on surrounding communities are listed below:

- Positive socio-economic temporary construction-related impacts include employment, production and GDP, household income, government revenue generation and skills development. Negative impacts include traffic congestion, altered sense of place (visual), noises, dust, and potential disruption to civic activity during construction.
- Post-construction and operation of the development as described in this proposed concept design is expected to result in positive socio-economic impacts such as provision of affordable housing in close proximity to the Cape Town CBD area as well as other economic nodes. Other positive impacts are expected on GDP and production, employment, household income, government revenue, and improved capacity and function of civic activities on site.

Summary statement of impact on surrounding communities:
Neighbouring residents and businesses, particularly to the south of erf 2187, may perceive the visual and aesthetic change associated with the development of the current open space as negative. The site at present can be considered a visual amenity, although the quality of the site as a visual amenity has been reduced as a result of neglect and deterioration of infrastructure and the former bowling greens. Nonetheless, the proposed concept will result in the loss of existing open space and impact the view of the adjacent residents. Although the loss of some views will occur, the key visual indicators have been considered in the design to ensure visual corridors are maintained and that the streetscape is visually appropriate.

Additionally, the proposed concept is expected to create continuity with surrounding land uses and unique retail character of the area. The intention of the proposed concept is to maximise the use of a currently underutilised piece of land, ideally located for residentially mixed-use development close to economic opportunities. Ultimately, the proposed concept has been designed to benefit surrounding communities by incorporating much needed residential space (including market-led affordable housing), retaining and upgrading the civic node an ECD facilities, provision of commercial opportunities (including office, retail and hotel spaces), incorporation of a pedestrian and green space networks that connect to the surrounding urban and landscape contexts.

5.	Explain how the risk of climate change may influence the proposed activity or development and how has the potential impacts of climate change been considered and addressed.

When considering climate change within a Basic Assessment process, the difference between climate change 'mitigation' and 'adaptation' needs to be well understood. Climate change mitigation relates to the action(s) taken to minimise the effect of the project on climate change through reducing the emissions generated by a project and/or to remove greenhouse gases from the atmosphere through the project. Whereas climate change adaptation relates to the action(s)

undertaken to mitigate against the effects of climate change on the project through measures such as increasing the resilience of a project to the effects of climate change.

Proposed developments should be designed with a precautionary approach, accounting for the novelty and complexity of climate change. Tools such as the Western Cape Climate Change Response Strategy (WC CCRS) of 2014 and the Green Book developed by the Council for Scientific Research (CSIR) in 2019 and others (where available) aid an understanding of the vulnerability of a project to climate change.

The WC CCRS (2014) predicts that the province will experience rising mean and maximum temperatures, more frequent hot days and heatwaves, warmer minimum temperatures with fewer cold and frost days, a general drying trend in the west, more intense rainfall events, and rising sea levels with associated storm surges. The Green Book Adaptation Tool[4] assesses the City of Cape Town to be at possible risk for wildfires, low risk for flooding with an increasing risk of heat extremes and heat waves.

The Smart-Agri plan builds on the WC CCRS (2014) to enhance the climate change resilience of the agricultural sector, in particular. The Smart-Agri plan divides the Western Cape Province into several climatic zones with unique climate change impacts that demand adaptation. The site falls within the Cape Town–Winelands Agro-Climatic Zone and has the following currently climatic features: winter rainfall and hot dry summers. The temperature projections for the area involve 'low range warming'.

The proposed mixed-use development, comprising residential, retail, commercial, civic and hotel components, has considered the potential risks associated with climate change as part of the conceptual planning and urban design approach. Climate change may impact the development through increased temperatures, more frequent extreme weather events, changing rainfall patterns, and potential coastal hazards, which could affect stormwater management, the performance of built infrastructure, and the quality and usability of open public spaces. This application is based on a concept design, and careful consideration should be given to the type of building materials to be used when actual development is planned for the site to optimise the resilience of the development to climate change.

The concept design incorporates green infrastructure as part of a broader strategy to support climate change adaptation and mitigation. The stormwater management plan includes bioswales, planted beds and podium bioretention systems, focusing on the treatment of stormwater quality rather than attenuation due to the site being close to the coast.

Sea level rise poses a risk to coastlines worldwide. By 2100, the global mean sea level (GMSL) could rise by approximately 43 cm, and in a worst-case scenario by 85 cm[5]. Cape Town's coastline is at risk of flooding and research shows that the sea levels along Africa's coast are rising faster than the global average[6]. It is worth noting that the ground level of the site ranges between 7 to 15 meters above mean sea level, and coastal protection exists in the form of the existing Sea Point promenade adjacent to the site.

The proposed conceptual design incorporates a green network which builds on existing site conditions and environmental informants to establish a connected landscape framework that integrates the development with its surrounding context, including the adjacent promenade. The

[4] CSIR, 2019. Green Book: Adapting South African settlements to climate change. Available at: www.greenbook.co.za. Accessed: 19 September 2025.

[5] https://www.capetown.gov.za/Explore%20and%20enjoy/nature-and-outdoors/our-beaches-and-coast/sea-level-rise

[6] https://iol.co.za/capeargus/news/2026-03-18-rising-sea-levels-pose-a-growing-threat-to-cape-towns-coastline/

green network further includes a residential pocket park and landscaped parking courts to reduce visual impacts and improve microclimatic conditions, as well as bioswales to support sustainable stormwater management. The proposed road network will incorporate landscaped sidewalks and tree planting to create a comfortable and pedestrian-friendly environment. Additional tree planting along Helen Suzman Boulevard could function as a visual screen in accordance with heritage guidance. As the surrounding area forms part of a highly urbanised district, the design approach seeks to create spaces that are both pro-green and pro-urban by effectively integrating natural elements with the built environment through innovative urban and landscape design. The incorporation of green infrastructure and quality public realm design can also assist in mitigating urban heat island effects, improving microclimatic conditions, and strengthening ecological connectivity within the urban fabric.

6.	Explain whether there are any conflicting recommendations between the specialists. If so, explain how these have been addressed and resolved.

There are no conflicting recommendations between specialists. Conflicting needs and specialist recommendations were largely resolved through the extensive multidisciplinary and consultative design process undertaken for this project. The proposed concept design therefore reflects a consolidation of the inputs and assessments of all professionals involved in the project.

7.	Explain how the findings and recommendations of the different specialist studies have been integrated to inform the most appropriate mitigation measures that should be implemented to manage the potential impacts of the proposed activity or development.

The findings and recommendations of the different specialist studies have been integrated in the concept design process. Mitigation measures associated with heritage, visual, socio-economic and transport impacts, and have been incorporated into the Environmental Management Programme for implementation during the construction and post construction phase, where appropriate (see **Appendix H**). It should be noted that the potential post-construction impacts identified by the specialists were considered as informants to the concept design and therefore the design has responded to these informants accordingly, where possible. Mitigation measures identified in the specialist assessments contribute to the framework and parameters within which future development of the site should be undertaken. The specialist mitigation measures are recommended to ensure the development of the site, should authorisation be granted, will align with the concept design proposed.

During the construction phase, the implementation of specialist and EAP recommendations will be monitored by a suitably qualified Environmental Control Officer and externally audited in accordance with Regulation 34 of the EIA Regulations (2014, as amended).

8.	Explain how the mitigation hierarchy has been applied to arrive at the best practicable environmental option.

The development proposal must be consistent with the principles of environmental management as codified in the National Environmental Management Act (NEMA). These principles include the following:

- Environmental management must place people and their needs at the forefront of its concern, and serve their physical, psychological, developmental, cultural and social interests equitable.
- Development must be socially, environmentally and economically sustainable.
- Sustainable development requires the consideration of all relevant factors including […] that negative impacts on the environment and on people's environmental rights be anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied.

Environmental impact assessment addresses the latter principle of the management of environmental impacts through the mitigation hierarchy (Figure 53). Simply put, impacts must be 'avoided, or, where they cannot be altogether avoided, are minimised and remedied.'

The DEA 2013 guideline on Need and Desirability formalises the hierarchy as follows:

- Firstly, alternatives must be investigated to avoid negative impacts altogether
- Secondly, after it has been found that the negative impacts cannot be avoided, alternatives must be investigated to reduce (mitigate and manage) unavoidable negative impact
- Thirdly, alternatives must be investigated to remediate (rehabilitate and restore)
- Fourthly, unavoidable impact that remain after mitigation and remediation must be compensated for, through investigation options to offset the negative impacts
- While throughout, alternatives must be investigated to optimise positive impact

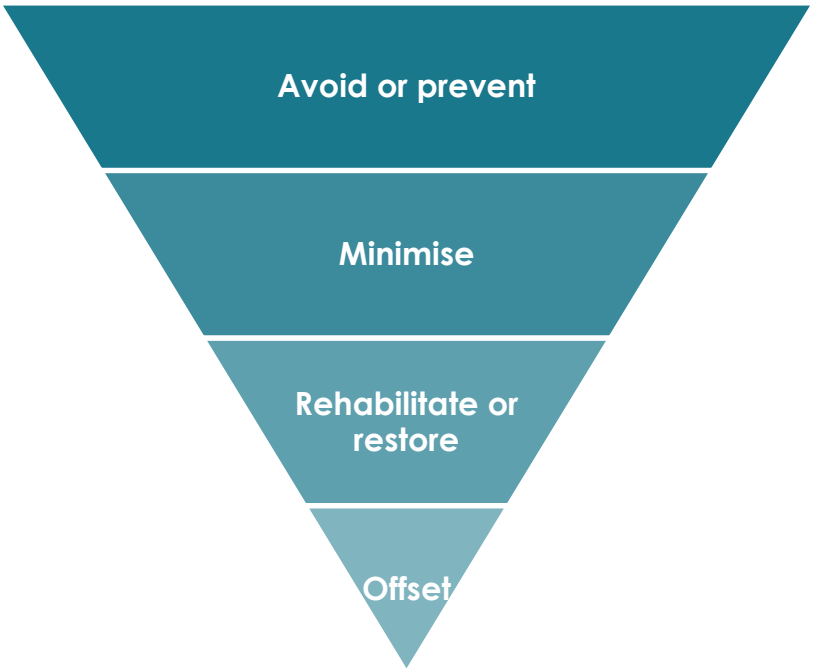


Figure 53: Mitigation hierarchy (based on DEA 2013 guideline on Need and Desirability)

The need and desirability of the project have been considered in treat detail in **Appendix K** of this BAR. In terms of impact management, the negative impacts associated with the proposed development cannot be entirely avoided, since they include construction-related impacts such as noise, vibrations and dust, as well as traffic during both the construction and the operational phases. These impacts can however be effectively **minimised** through the mitigation measures set out in this report and in the EMPr.

SECTION J: GENERAL

1. Environmental Impact Statement

1.1.	Provide a summary of the key findings of the EIA.

The applicant, the City of Cape Town Property Development Department, is proposing a high-intensity mixed-use development on Erf 2187 in Three Anchor Bay. The proposed development of the site is intended to maximise the use of well-located underutilised public land close to employment opportunities and economic nodes and provides the opportunity for affordable housing close to central business district.

The proposed concept design provides a framework to guide future development, establishing principles, structure, and parameters within which future development can occur. The actual design of the site will be undertaken by the future developers of the site. The proposed development of the site for mixed-use aligns with the municipal and local frameworks and responds directly to the increasing need for residential housing in and around the central business district. The inclusion of retail offerings is intended to enhance the connectivity and continuity of the site with the surrounding retail character, activating the Main Road street interface. The proposed concept design also intends to not only retain but enhance the capacity and functionality of the existing civic node on the site.

The proposed concept design has undergone an iterative design process, and the various elements are described below:

Civic node

- Sea Point Civic Centre and Hall
- Existing Sea Point Public Library with a proposed extension and additional development bulk envisaged above the existing building footprint (design subject to heritage, structural, visual impact and architectural specialist input at Precinct Plan stage, consistent with the conditions set out in the Heritage Impact Assessment).
- Above ground parking bays and access to basement parking
- New location for a crèche

Residential and commercial components

- Residential (including affordable, middle- and high-income housing)
- Hotel space
- Retail space
- Office and other business land uses
- Internal roadways and access to basement parking

Basement parking

- Three levels

Internal roads

- Class 5B (road width = 6.4 m and road reserve = 12 m)
- Class 5C roads (road width = 5.5 m and road reserve = 10 m).

Green space

- Hard and soft landscaping internal to the site along access roads and internal pedestrian routes

- Retention and preservation of eucalyptus trees on the eastern side of the site
- Retention and preservation of the trees bordering the site along Sea Point Main Road forming part of the extended Cape Town Fan Walk

The proposed land use is consistent with spatial planning and land use management frameworks, which identify it for inclusionary housing and urban development. The site is entirely transformed and there are no indigenous vegetation or ecosystems of concern on the property, therefore no negative impacts biodiversity are anticipated. A stormwater management plan has been compiled (**Appendix L3**) which provides a conceptual strategy for water quality treatment in line with the City of Cape Town's various policies, Water Sensitive Urban Design (WSUD) and Sustainable Urban Drainage (SUDs) and integrates the proposed stormwater system into the surrounding system.

The specialist assessments undertaken for the proposed mixed-use development, indicate that the site can be developed without resulting in unacceptable environmental or socio-economic impacts, provided that recommended mitigation measures are implemented.

Heritage Impact Assessment:

The HIA identified several heritage resources on and surrounding the site, with the Colin Eglin Library and Sea Point Civic Centre (Grade IIIA) and the eucalyptus tree avenue being of the highest significance due to their architectural and social value. Other resources, including the electrical substation hold moderate significance, while the former bowling club structures are of low significance.

The proposed development has been designed to retain key heritage sources, particularly the library, civic centre and the eucalyptus trees, thereby avoiding significant adverse impacts. Furthermore, potential impacts, such as loss of open space and changes to the surrounding urban landscape, are assessed as medium significance reducing to low with mitigation. Overall, the development is considered acceptable from a heritage perspective, subject to conditions including heritage-sensitive design, specialist oversight, and approval of detailed plans.

Visual Impact Assessment:

The VIA concludes that the proposed development represents an intensification of land use but is visually compatible with the surrounding urban environment. Key design responses, such as the retention of visual corridors, articulated massing, and a graduated height strategy, ensure that visual impacts are mitigated. The development contributes to a more coherent urban edge and improved spatial definition. Residual visual impacts are assessed as low to medium-low (acceptable), with the proposal considered visually appropriate within the Three Anchor Bay context.

However, subsequent concept testing associated with the retained civic node introduces a materially more sensitive visual consideration. Interventions involving vertical additions to the retained civic / library ensemble cannot be supported in principle without careful architectural resolution. Such interventions may be visually supportable only where:

- retained civic buildings remain visually primary;
- new additions are subordinate, recessive and carefully set back;
- rooftop accretions are avoided;
- architectural integration is highly resolved;
- spatial openness and civic identity are preserved.

The visual acceptability of such interventions should therefore remain contingent upon detailed architectural refinement and further specialist review.

Transport Impact Assessment:

The TIA finds that the surrounding road network has sufficient capacity to accommodate the proposed development, provided that signal optimisation measures are implemented at key intersections. The site is well-located in relation to major transport routes and public transport infrastructure. Proposed access arrangements, internal road networks and parking provision are considered appropriate. The development also supports non-motorised transport (NMT) through improved pedestrian and cycling infrastructure. Overall, transport impacts can be adequately mitigated, and the development is supported from a transport perspective.

Socio-Economic Impact Assessment:

The SEIA indicates that the proposed development will result in net positive socio-economic benefits. During construction, benefits include increased GDP, employment, income, and skills development, while operational benefits include long-term employment, improved housing availability (including affordable housing), and enhanced civic activity. Negative impacts, such as traffic, visual changes, and temporary construction disturbances, are largely localised and of lower significance. The development aligns with policy objectives promoting urban integration, economic growth, and well-located housing, and is considered socio-economically desirable.

Across all specialist studies, the proposed development is considered appropriate and supportable, with impacts generally assessed as low to medium and capable of being mitigated. The project responds positively to its urban context, supports spatial planning objectives, and delivers meaningful socio-economic benefits, particularly in terms of housing provision and economic activity.

Please see Table 11 below for a summary of the key impacts assessed.

Tree Protection Zones (Appendix L5)

The Landscape Architecture Report includes a Tree Survey which identifies tree protection zones to ensure that the trees on heritage and landscape significance are protected and retained. Protection measures include:

- No development, excavation, paving or trenching should occur within the TPZ,
- Where possible, all construction-related activities should be kept outside of the dripline of the tree.
- The following activities should be avoided within the TPZ:
    - Soil compaction,
    - Parking of heavy machinery beneath trees,
    - Storage of construction materials,
    - Alteration of existing soil levels around trees,
    - Installation of hard surfacing close to tree trunks, and
    - Trenching through root zones.

Alternatives to Tree Removal (transplanting and retention options):

- Tree transplanting:
    - Transplanting should be prioritised as an alternative to removal where feasible,
    - A qualified arborist or skilled tree worker should be consulted to assess suitability and advise on appropriate transplanting methods.
- Retention and ecological value:
    - Mature and significant trees should be retained wherever possible, given their ecological, cultural and aesthetic importance,
    - Even mature exotic trees may contribute significantly to cultural landscapes and local character and should therefore not be removed by default,

Trees should only be removed where trees pose an unmanageable risk to people, property, or infrastructure.

1.2.	Provide a map that that superimposes the preferred activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. (Attach map to this BAR as Appendix B2)

Appendix B2 includes a sensitivity map as required. No environmental sensitivities occur on site, but the map includes those of heritage significance, namely the library and civic centre as well as the eucalyptus trees on the eastern side of the site. Development should also take cognisance of the root system and drip line of the trees to south of the cadastral boundary of the site and protect the trees from groundworks and subsequent construction.

1.3.	Provide a summary of the positive and negative impacts and risks that the proposed activity or development and alternatives will have on the environment and community.

Table 11 below is a summary of the impacts identified in respect of the proposed development and the no-go alternative. All impacts identified and assessed, as well as the proposed mitigation measures and management actions, can be found in Section I on page 188 of this BAR. In addition, all the mitigation and management measures proposed by the specialists, including additional impacts and management measures identified by the EAP, have been included in the EMPr (**Appendix H** of this report) where appropriate. Specialist reports are included in **Appendix G** of this report.

Table 11: Significance of impacts

	Alternative 1 (preferred)		Alternative 2: No-go
	Without mitigation	With mitigation	Without mitigation With mitigation
CONSTRUCTION PHASE			
Construction-phase transport impacts	Medium negative	Low negative	None
Construction-phase noise and vibration impacts	Medium-high negative	Low negative	None
Construction-phase dust impacts	Medium-high negative	Low negative	None
Socio-economic impacts			
Construction-phase impact on production and GDP	Medium-high positive	High positive	None
Construction-phase employment creation	Medium positive	Medium-high positive	None
Construction-phase household income impacts	Medium positive	Medium-high positive	None
Construction-phase impact on government revenue	Medium positive	Medium-high positive	None
Construction-phase skills development impacts	Low positive	Medium positive	None
Construction-phase traffic congestion impacts (from a socio-economic perspective)	Medium-high negative	Medium negative	None
Construction-phase impact on sense of place (visual)	Medium negative	Low negative	None
Construction-phase impact on access to civic facilities and services	High negative	Medium negative	None
Construction-phase impact on ECD centre	High negative	Medium-high negative	None
POST-CONSTRUCTION PHASE			
Socio-economic impacts			
Sustained impact on production and GDP	Medium positive	Medium-high positive	None

Sustained impact on employment creation	Medium-high positive	High positive	None
Sustained impact on household income impacts	Medium-high positive	High positive	None
Sustained impact on government revenue	Medium positive	Medium positive	None
Sustained impact on skills development impacts	Low positive	Medium positive	None
Sustained impact on traffic flow impacts (from a socio-economic perspective)	High negative	Medium-high negative	None
Sustained impact on sense of place (visual)	Medium negative	Low negative	None
Sustained impact on land value	Low positive	Low positive	None
Sustained impact on access to civic facilities and services	Medium positive	High positive	None
Sustained impact on ECD centre	Medium positive	High positive	None
Sustained impact on recreational activity impacts	Medium negative	Medium negative	None
Sustained impact on housing availability and affordable housing provision	Medium-high positive	High positive	None
Transport impacts			
Anticipated transport impacts	Medium negative	Low negative	None
Visual impacts			
Impact on visual corridors	Medium – high change	Low – medium change (acceptable)	None
Visual impact on Green Point Common interface	High change	Medium – low change (acceptable)	None
Visual impact on the streetscape	Medium change	Low change (positive)	None
Visual impact on infrastructure viewpoints	Medium change	Medium change (positive)	None
Visual impact on distant viewpoints (promenade, High Level Road and Signal Hill)	Medium change	Medium – low change (acceptable)	None
Civic node visual impacts (conceptual - detailed assessment required at SDP stage)	Medium – high change	Low – medium change (acceptable)	None
Heritage impacts			
Potential impact on the Colin Eglin Library and Sea Point Civic Centre Complex (subject to further assessment)	High negative	Medium positive	None
Loss of a long-standing open space (former bowling greens)	Medium negative	Low negative	None
Impact on heritage significance of urban landscape	Medium negative	Low negative	None

Note that the significance ratings for the visual impacts derive from the magnitude of change and receptor sensitivity, reflecting the degree of visual change. The nature of the impact is included which shows whether the impact is acceptable, negative or positive. This is based on the assessment criteria described in the VIA (Appendix G2).

Alternative 1 (preferred): Proposed concept design

The negative impacts of Alternative 1 can be satisfactorily mitigated through the implementation of the recommendations contained in the Basic Assessment Report and Environmental Management Programme. Alternative 1 is expected to have positive socio-economic outcomes in both the construction and operational phases and is therefore the preferred alternative.

Alternative 2 (No-go)

The impacts of the no-development alternative include underutilisation of publicly owned and well-located land, and the opportunity cost of not facilitating justifiable social and economic development. Should the 'no-go' alternative be considered, there would be no benefits to the local economy. The

alternative also bears the opportunity cost of missed socio-economic benefits – such as housing and enhanced civic activities – for the local community. Although the 'no-go' alternative would avoid the negative impacts associated with the proposed development, it would also result in the positive impacts not being realised. As stated in the socio-economic impact assessment, the positive impacts of the proposed development are expected to outweigh the negative effects, the construction and operation of the project is preferred over the 'no-go' alternative.

2. Recommendation of the Environmental Assessment Practitioner ("EAP")

2.1.	Provide Impact management outcomes (based on the assessment and where applicable, specialist assessments) for the proposed activity or development for inclusion in the EMPr

To ensure the desired impact management outcomes, adherence to the Environmental Management Programme and Environmental Authorisation, if granted, should be monitored by a suitably qualified and experienced Environmental Control Officer during the construction phase. Impact management outcomes for the proposed development are set out in the EMPr, and include the following:

- Ensure the positive impacts identified by the socio-economic impact assessment are maximised, and negative impacts minimised.
- The following recommendations are described in the HIA (Appendix G1), and should be conditions of approval:
    - Any work to the Civic Centre and Library building complex – maintenance, repairs, alterations and additions are to be undertaken by, or with the input and monitoring of a heritage architect with suitable experience in modernist buildings and any alterations and additions should be subject to a further assessment, public consultation and approval by HWC.
    - The future repair, upkeep and maintenance of the Civic Centre and Library building complex, be specifically set as a condition of the EA approval (to be provided in the agreement with a successful bidder for the property)
    - The submission of urban design guidelines, to be presented to HWC for endorsement at SDP stage, and prior to any building plan approval. All further site development plan development or building plans should be substantially in accordance with the urban design guidelines or otherwise referred to HWC for approval.
    - Further detailed plans based on the Landscape Master Plan prepared by a suitably qualified landscape architect with the urban design guidelines for endorsement by HWC at SDP stage.
- The urban design guidelines (to be prepared by ACG) should inform the detailed design of the various components of the proposed development to ensure that the relevant design informants and parameters are incorporated.
- The stormwater management plan should be implemented, ensuring adequate stormwater treatment that meets the municipality's pollutant removal performance outcomes (≥80% TSS, ≥45% TP for brownfield sites).

Ultimately, the future development of the site should align with the recommendations made by the specialists and be designed within the set of parameters determined by the proposed concept design. Given the iterative design process, if the development falls within the framework described in this report, the various negative impacts identified by the specialists and EAP are expected to be adequately mitigated and the positive impacts maximised. The development should provide residential opportunities (including market-led affordable housing), retail, hotel, other commercial uses and improved civic services that benefit the surrounding communities.

2.2.	Provide a description of any aspects that were conditional to the findings of the assessment either by the EAP or specialist that must be included as conditions of the authorisation.

The conditions of authorisation should include:

- The development and implementation of an Urban Design Guidelines and Development Requirements Report, which will be prepared to support the land use management process and town planning application. The report will establish urban design principles and guidelines, development requirements and parameters, additional design and land release guidelines, and illustrative test diagrams.
- The implementation and monitoring of the Environmental Management Programme (EMPr).
- The monitoring and implementation of tree protection zones as described in the Landscape Master Plan.

Notably, the following recommendations are described int the HIA (Appendix G1), and should be conditions of approval:

- Any work to the Civic Centre and Library building complex – maintenance, repairs, alterations and additions are to be undertaken by, or with the input and monitoring of a heritage architect with suitable experience in modernist buildings and any alterations and additions should be subject to a further assessment, public consultation and approval by HWC.
- The future repair, upkeep and maintenance of the Civic Centre and Library building complex, be specifically set as a condition of the EA approval (to be provided in the agreement with a successful bidder for the property)
- The submission of urban design guidelines, to be presented to HWC for endorsement at SDP stage, and prior to any building plan approval. All further site development plan development or building plans should be substantially in accordance with the urban design guidelines or otherwise referred to HWC for approval.
- Further detailed plans based on the Landscape Master Plan prepared by a suitably qualified landscape architect with the urban design guidelines for endorsement by HWC at SDP stage.

Certain aspects of the proposed development are conditional on the findings and recommendations of the Heritage Impact Assessment (HIA). These conditions are anticipated to be formalised by Heritage Western Cape in its review of the Basic Assessment Report and associated HIA. In particular, conditions of authorisation may require that all proposed maintenance, repairs, alterations, and additions to heritage resources should be undertaken by a suitably qualified heritage architect with demonstrated experience in modernist buildings, and any proposed changes should be subject to a public consultation process. This is to ensure that the final design remains consistent with heritage conservation objectives and adequately responds to identified heritage resources and sensitivities.

2.3.	Provide a reasoned opinion as to whether the proposed activity or development should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be included in the authorisation.

Based on the findings of this Basic Assessment, it is the opinion of the EAP that there are no negative impacts that cannot be satisfactorily mitigated to acceptable levels. The assessed project benefits outweigh negative impacts, and the project is anticipated to address various socio-economic needs. It is consistent with municipal and provincial planning and will not result in environmental opportunity costs or unacceptable degradation of sensitive natural systems.

In order to ensure the effective implementation of the mitigation and management actions, an EMPr has been compiled (**Appendix H**). The mitigation measures necessary to ensure that the project is planned, constructed and operated in an environmentally responsible manner are listed in the EMPr. The EMPr is a dynamic document that should be updated regularly and provide clear and implementable measures for the establishment and operation of the proposed development.

Provided that the specified mitigation measures are applied effectively, it is recommended that the project **should receive environmental authorisation** in terms of the 2014 EIA Regulations, as amended, subject to the following conditions:

- That Alternative 1 be authorised subject to submission of a site development plan for approval by the competent authority prior to construction.
- The mitigation measures recommended in the specialist impact assessments, or any future revision thereof accepted by the City of Cape Town, must be implemented.
- The Environmental Management Programme (EMPr) forming part of this Basic Assessment Report must be implemented during the design and construction phases of the development.
- An independent Environmental Control Officer must be appointed for the duration of the construction phase and must carry out the responsibilities of that role as defined in the EMPr.
- Urban Design Guidelines are to be prepared based on the Urban Design Concept (Appendix L1) and specialists reports and should inform the detailed design of the various components of the proposed development and the detailed design of the site should be substantially in accordance with the guidelines contained therein.
- The stormwater management plan should be implemented, ensuring adequate stormwater treatment that meets the municipality's pollutant removal performance outcomes (≥80% TSS, ≥45% TP for brownfield sites).
- From a heritage impact perspective, all proposed maintenance, repairs, alterations, and additions to heritage resources should be undertaken by a suitably qualified heritage architect with demonstrated experience in modernist buildings, and any proposed changes should be subject to a public consultation process. Additionally, the recommendations of the Heritage Impact Assessment, to the extent endorsed by Heritage Western Cape, must be implemented.

2.4.	Provide a description of any assumptions, uncertainties and gaps in knowledge that relate to the assessment and mitigation measures proposed.

There are no significant uncertainties or gaps in knowledge relating to the assessment and mitigation measures, other than those specifically listed in the relevant specialist studies. Current knowledge is limited insofar as the economic outcomes of the proposed development are not quantified. Control of groundwater ingress into the basement excavations during construction may be necessary and precautions against chemical attack and/or corrosion are provisionally recommended. The proposed concept design is intended as a framework from which the final development is to be determined. Depending on the final development design and extent of basement parking included, a hydrogeological specialist may be required and relevant water use application undertaken. The scale and nature of the development, and the fact that socio-economic impacts are anticipated to be positive while biophysical impacts are not significant, means that this limitation in knowledge is acceptable and does not pose a risk.

It is assumed that all information provided to the EAP by the Applicant is true and without omission. It is also assumed that all mitigation, management, and monitoring measures prescribed in this Basic Assessment Report and the accompanying Environmental Management Programme will be implemented by the applicant. There are no significant uncertainties or gaps in knowledge.

2.5.	The period for which the EA is required, the date the activity will be concluded and when the post construction monitoring requirements should be finalised.

The EA is required for a validity period of ten years, with the activity to be conducted within a further twenty-year period. The post-construction monitoring requirements should be finalised within a five-year period or on completion of bulk earthworks.

3. Water

Since the Western Cape is a water scarce area explain what measures will be implemented to avoid the use of potable water during the development and operational phase and what measures will be implemented to reduce your water demand, save water and measures to reuse or recycle water.
During the construction phase non-potable water sources will be used as far as possible, as stipulated in the EMPr.

4. Waste

Explain what measures have been taken to reduce, reuse or recycle waste.
Construction-phase waste minimisation and recycling is a requirement of the EMPr. The establishment of a management authority (e.g. a body corporate or homeowners' association) is recommended to ensure ongoing compliance with the Environmental Management Programme during the post-construction phase, as well as the continued management of open space areas to prevent waste-related impacts.

5. Energy Efficiency

8.1.	Explain what design measures have been taken to ensure that the development proposal will be energy efficient.

The development is considered feasible from an electrical engineering perspective, subject to detailed design, statutory approvals and formal confirmation of supply capacity. The electrical assessment indicates that the development can be supplied from the existing network, subject to the implementation of new infrastructure. Key electrical infrastructure requirements include:

- A new substation to accommodate the development load,
- New 3-feeder-group of underground cables from Mouillie Point 132/11kV substation,
- Relocation and/or protection of existing buried services including medium and high voltage cables and dedicated feeds to the SABC studios,
- Internal medium- and low- voltage reticulation systems.

The proposed electrical network shall be designed with consideration for reliability and future expansion, including N+1 redundancy where feasible. The project also presents an opportunity to strengthen the grid in the immediate vicinity and surrounding areas. New medium or high voltage connections and substations will need to be developed and these in turn could bolster the capacity and robustness of the electricity infrastructure in the area.

SECTION K: DECLARATIONS (TO BE COMPLETED FOR FINAL BAR SUBMISSION)

DECLARATION OF THE APPLICANT

Note: Duplicate this section where there is more than one Applicant.

I……, ID number ……in my personal capacity or duly authorised thereto hereby declare/affirm that all the information submitted or to be submitted as part of this application form is true and correct, and that:

- I am fully aware of my responsibilities in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA"), the Environmental Impact Assessment ("EIA") Regulations, and any relevant Specific Environmental Management Act and that failure to comply with these requirements may constitute an offence in terms of relevant environmental legislation;
- I am aware of my general duty of care in terms of Section 28 of the NEMA;

- I am aware that it is an offence in terms of Section 24F of the NEMA should I commence with a listed activity prior to obtaining an Environmental Authorisation;

- I appointed the Environmental Assessment Practitioner ("EAP") (if not exempted from this requirement) which:
  - meets all the requirements in terms of Regulation 13 of the NEMA EIA Regulations; or
  - meets all the requirements other than the requirement to be independent in terms of Regulation 13 of the NEMA EIA Regulations, but a review EAP has been appointed who does meet all the requirements of Regulation 13 of the NEMA EIA Regulations;

- I will provide the EAP and any specialist, where applicable, and the Competent Authority with access to all information at my disposal that is relevant to the application;

- I will be responsible for the costs incurred in complying with the NEMA EIA Regulations and other environmental legislation including but not limited to –
  - costs incurred for the appointment of the EAP or any legitimately person contracted by the EAP;
  - costs in respect of any fee prescribed by the Minister or MEC in respect of the NEMA EIA Regulations;
  - Legitimate costs in respect of specialist(s) reviews; and
  - the provision of security to ensure compliance with applicable management and mitigation measures;

- I am responsible for complying with conditions that may be attached to any decision(s) issued by the Competent Authority, hereby indemnify, the government of the Republic, the Competent Authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which I or the EAP is responsible in terms of the NEMA EIA Regulations and any Specific Environmental Management Act.

Note: If acting in a representative capacity, a certified copy of the resolution or power of attorney must be attached.

Signature of the Applicant: Date:

Name of company (if applicable):

DECLARATION OF THE ENVIRONMENTAL ASSESSMENT PRACTITIONER ("EAP")

I ……, EAP Registration number …….. as the appointed EAP hereby declare/affirm the correctness of the:

- Information provided in this BAR and any other documents/reports submitted in support of this BAR;
- The inclusion of comments and inputs from stakeholders and I&APs;
- The inclusion of inputs and recommendations from the specialist reports where relevant; and
- Any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties, and that:
- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity; or
  - am not independent, but another EAP that meets the general requirements set out in Regulation 13 of NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review EAP must be submitted);
- In terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;
- I have disclosed, to the Applicant, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this application;
- I have ensured that information containing all relevant facts in respect of the application was distributed or was made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were provided with a reasonable opportunity to participate and to provide comments;
- I have ensured that the comments of all interested and affected parties were considered, recorded, responded to and submitted to the Competent Authority in respect of this application;
- I have ensured the inclusion of inputs and recommendations from the specialist reports in respect of the application, where relevant;
- I have kept a register of all interested and affected parties that participated in the public participation process; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations;

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE SPECIALIST

Note: Duplicate this section where there is more than one specialist.

I ……, as the appointed Specialist hereby declare/affirm the correctness of the information provided or to be provided as part of the application, and that:

- In terms of the general requirement to be independent:
  - other than fair remuneration for work performed in terms of this application, have no business, financial, personal or other interest in the development proposal or application and that there are no circumstances that may compromise my objectivity; or

  - am not independent, but another specialist (the "Review Specialist") that meets the general requirements set out in Regulation 13 of the NEMA EIA Regulations has been appointed to review my work (Note: a declaration by the review specialist must be submitted);

- In terms of the remainder of the general requirements for a specialist, have throughout this EIA process met all of the requirements;

- I have disclosed to the applicant, the EAP, the Review EAP (if applicable), the Department and I&APs all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared or to be prepared as part of the application; and

- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations.

Signature of the EAP: Date:

Name of company (if applicable):

DECLARATION OF THE REVIEW SPECIALIST

I ....., as the appointed Review Specialist hereby declare/affirm that:

- I have reviewed all the work produced by the Specialist(s):
- I have reviewed the correctness of the specialist information provided as part of this Report;
- I meet all of the general requirements of specialists as set out in Regulation 13 of the NEMA EIA Regulations;
- I have disclosed to the applicant, the EAP, the review EAP (if applicable), the Specialist(s), the Department and I&APs, all material information that has or may have the potential to influence the decision of the Department or the objectivity of any Report, plan or document prepared as part of the application; and
- I am aware that a false declaration is an offence in terms of Regulation 48 of the NEMA EIA Regulations.

Signature of the EAP: Date:

Name of company (if applicable):