Need and Desirability

Proposed Mixed-Use development on Erf 2187, Three Anchor Bay, Green Point

APPENDIX K

VERSION: DRAFT
DATE: June 2026

PREPARED FOR
City of Cape Town Property Development Branch

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DOCUMENT DETAILS

PROPOSED MIXED-USE DEVELOPMENT ON ERF 2187, THREE ANCHOR BAY, GREEN POINT: NEED AND DESIRABILITY

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Report purpose

This appendix provides a description of the rationale and motivation for the proposed dredging of the Milnerton Lagoon. It outlines key aspects of the 'need and desirability' of the proposal, as required by the EIA Regulations.

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1 INTRODUCTION

This appendix provides a description of the rationale and motivation for the proposed development. It outlines key aspects of the 'need and desirability' of the proposal, as required by the EIA Regulations.

The consideration of 'need and desirability' of a proposal is a key part of environmental impact assessment which relates to the context, broader societal needs, and the public interest. Need and desirability, although not defined under the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended (NEMA), are generally considered to relate to:

(a) the economic and/or societal benefit likely to be conferred by a proposed development, and

(b) the policy and spatial planning context in which the proposed activity takes place.

Put another way, the concept of need and desirability relate to whether an activity is being proposed at the right *time* and in the right *place*.

The table below is based on the Guidelines for Need and Desirability (DEA, 2014 and DEA&DP, 2013) and sets out the key considerations motivating the need and desirability of the project proposal. This section should be read with Section E of the Basic Assessment Report, which sets out in more detail the legislative, policy, and planning contexts in which the project is proposed.

Table 1. Need and desirability guidelines as applied to the project proposal

Guideline question	Response
- How will this development (and its separate elements/aspects) impact on the ecological integrity of the area?	According to the Western Cape Biodiversity Spatial Plan and Guidelines (CapeNature, 2024), Erf 2187, Three Anchor Bay is not mapped within any Critical Biodiversity Areas, Ecological Support Areas or Protected Areas. The proposed mixed-use development at Three Anchor Bay is located on a brownfield site within an urban area that is entirely transformed by previous activities and supports primarily alien and invasive vegetation. As a result, the development is not anticipated to have any impacts on the ecological integrity of the area given the existing transformed nature of the development footprint.
- How were the following ecological integrity considerations taken into account?: - Threatened Ecosystems,	According to the DFFE Screening Tool, the site is mapped as having a very high terrestrial biodiversity sensitivity due to the presence of 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. There are also no indigenous vegetation remains left on the site, and it is not representative of a threatened ecosystem.

Guideline question	Response
- Sensitive, vulnerable, highly dynamic or stressed ecosystems, such as coastal shores, estuaries, wetlands, and similar systems require specific attention in management and planning procedures, especially where they are subject to significant human resource usage and development pressure.	Sensitive and vulnerable ecosystems are not present on the site and will therefore not be impacted by the proposed development. Although a portion of the site falls within 100 metres of the Atlantic Ocean's highwater mark, it is located within the urban edge, landward of Beach Road and the promenade. No impacts on the coastline are anticipated, as all construction activities will be confined to the development footprint.
- Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs).	According to the Western Cape Biodiversity Spatial Plan and Guidelines (CapeNature, 2024), Erf 2187, Three Anchor Bay is not mapped within any Critical Biodiversity Areas, Ecological Support Areas or Protected Areas.
- Conservation targets	The proposed mixed-use will not impact on conservation targets for terrestrial ecosystems, since the site is already developed with no natural vegetation on the site.
- Ecological drivers of the ecosystem.	The proposed development site does not have any ecological function.
- Environmental Management Framework	The proposed development falls within the Table Bay District for which a Spatial Development Framework and Environmental Management Framework (EMF) were adopted by the City of Cape Town in 2023. The framework states that development should 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. The vision for the Table Bay District is an innovative area that is accessible and offers a range of economic prospects, as well as an inclusive destination that offers more houses and opportunities to more people. The proposed development therefore aligns with the Table Bay EMF as it is to be residentially led and include retail and hotel offerings.
- Spatial Development Framework, and	The proposed development is located within the Urban Inner Core (UIC) as defined in the City of Cape Town Municipal SDF (2023). The desired spatial outcome for areas within the UIC is the concentration of a diverse range of higher-density land uses, integrated with existing and planned public transport infrastructure. The proposed development is consistent with this framework, as it aims to optimise and maximise the development potential of the site.
- Global and international responsibilities relating to the environment (e.g. RAMSAR sites, Climate Change, etc.).	The proposed development is not anticipated to impact on any global or international commitments.

Guideline question	Response
• How will this development disturb or enhance ecosystems and/or result in the loss or protection of biological diversity? What measures were explored to firstly avoid these negative impacts, and where these negative impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	The development is not anticipated to disturb or enhance ecosystems nor result in the loss or protection of biological diversity. Located on a transformed site in an urban area, it is unlikely to have any impact on these resources. The implementation of a stormwater management plan (see **Appendix L3**), in keeping with the City of Cape town's Management of Urban Stormwater Impacts Policy (2009), will minimise any potential impacts of changes in stormwater runoff on the biophysical environment.
• How will this development pollute and/or degrade the biophysical environment? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	Impacts on the biophysical environment are anticipated to be limited to changes in stormwater runoff, which will be minimised through implementation of a stormwater management plan (see **Appendix L3**) in keeping with the City of Cape Town's Management of Urban Stormwater Impacts Policy, 2009. Furthermore, measures have been explored to minimise identified construction and post-construction related impacts and are incorporated in the Environmental Management Programme (EMPr) (see **Appendix H**). There is no expectation that the proposed development will result in pollution and/or degrade the biophysical environment if the measures proposed in the EMPr are implemented successfully.
• What waste will be generated by this development? What measures were explored to firstly avoid waste, and where waste could not be avoided altogether; what measures were explored to minimise, reuse and/or recycle the waste? What measures have been explored to safely treat and/or dispose of unavoidable waste?	The proposed development will produce construction waste during the construction phase of the development. If not managed correctly, the resultant waste may pollute and/or degrade the biophysical environment. Measures for the minimisation, safe treatment and/or disposal of waste during the construction phase are incorporated in the Environmental Management Programme (EMPr). See **Appendix H** for further details.
• How will this development disturb or enhance landscapes and/or sites that constitute the nation's cultural heritage? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	According to the DFFE Screening Tool, the proposed development site is classified as having very high archaeological and cultural heritage sensitivities due to the close proximity to Grade IIIA heritage sites namely the Colin Eglin Sea Point Public Library and the Sea Point Civic Centre. There is also eucalyptus trees found on the site that are historic and part of the larger Green Point cultural landscape (see **Appendix G1 – HIA** for more information). Other significant heritage sites adjacent to the development are the Green Point Common PHS and Sea Point Promenade (Grade IIA). However, despite the close proximity to heritage sensitivities, the proposed mixed-use development aims to preserve the aspects of heritage concern while optimising the use of the site. This is to be done by retaining and extending the library and upgrading the civic centre buildings improving their capacity as public spaces. Additionally, the eucalyptus treeline on the eastern edge of the site is to be preserved.

Guideline question	Response
• How will this development use and/or impact on non-renewable natural resources? What measures were explored to ensure responsible and equitable use of the resources? How have the consequences of the depletion of the non-renewable natural resources been considered? What measures were explored to firstly avoid these impacts, and where impacts could not be avoided altogether, what measures were explored to minimise and remedy (including offsetting) the impacts? What measures were explored to enhance positive impacts?	Not applicable. The proposed development will not involve the use or exploitation of non-renewable natural resources. As such, there are no anticipated impacts relating to the depletion of such resources and thus no measures were investigated in this regard.
• How will this development use and/or impact on renewable natural resources and the ecosystem of which they are part? Will the use of the resources and/or impact on the ecosystem jeopardise the integrity of the resource and/or system taking into account carrying capacity restrictions, limits of acceptable change, and thresholds? What measures were explored to firstly avoid the use of resources, or if avoidance is not possible, to minimise the use of resources? What measures were taken to ensure responsible and equitable use of the resources? What measures were explored to enhance positive impacts? - Does the proposed development exacerbate the increased dependency on increased use of resources to maintain economic growth, or does it reduce resource dependency (i.e. de-materialised growth)? (note: sustainability requires that settlements reduce their ecological footprint by using less material and energy demands and reduce the amount of waste they generate, without compromising their quest to improve their quality of life) - Does the proposed use of natural resources constitute the best use thereof? Is the use justifiable when considering intra- and intergenerational equity, and are there more important priorities for which the resources should be used (i.e. what are the opportunity costs of using these resources of the proposed development alternative?) - Do the proposed location, type and scale of development promote a reduced dependency on resources?	The proposed activity will optimise the use of underutilised state-owned land within an urban area by redeveloping it for various community, retail, and residential uses, in an area close to public transport routes and economic nodes. It is anticipated that this will result in reduced resource dependency in that it reduces the distance between people's homes and places of work and thus their dependency on motor vehicle transport. The proposed site is already transformed and impacts on ecosystems and natural resources are therefore not anticipated. Although a portion of the site falls within 100 metres of the highwater mark of the Atlantic Ocean, the site is situated within the urban edge landward of existing infrastructure. Construction-related activities will be confined to the site, and no impacts on the coastal environment are therefore anticipated. Locating the proposed high-density development on a brownfields site within an urban area is an efficient use of resources relative to urban sprawl.
• How were a risk-averse and cautious approach applied in terms of ecological impacts? - What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)? - What is the level of risk associated with the limits of current knowledge? - Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?	Due to the fact that the proposed site is entirely transformed and is surrounded by urban development, the ecological impacts are known to be minimal. 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.
• How will the ecological impacts resulting from this development impact on people's environmental right in terms of the following: - Negative impacts: e.g. access to resources, opportunity costs, loss of amenity (e.g. open space), air and water quality impacts, nuisance (noise, odour, etc.), health impacts, visual impacts, etc. What measures were taken to firstly avoid negative impacts, but if	The proposed development is not anticipated to result in significant negative impacts on people's environmental rights. The development is also not expected to have an adverse impact on amenity value, air quality, or health. In addition, the residual visual impacts on the broader surrounding area have been assessed as **Low to Medium-Low (acceptable)**. Refer to **Appendix G2: Visual Impact Assessment** of the draft BAR.

Guideline question	Response
avoidance is not possible, to minimise, manage and remedy negative impacts? - Positive impacts: e.g. improved access to resources, improved amenity, improved air or water quality, etc. What measures were taken to enhance positive impacts?	The development includes general construction-related impacts including noise, vibration, visual and traffic. However, these are temporary in nature, and mitigation measures will be undertaken during the construction phase of the development to minimise these impacts. The impact of the proposed project on the surrounding community during the construction phase is discussed in detail in the draft Basic Assessment Report. Positive impacts are expected to include the creation of temporary employment during the construction phase, and improved access to housing and retail opportunities post-construction. Additionally, the preservation and upgrades to the civic node on site are expected to improve the capacity and functionality of the associated services.
• Describe the linkages and dependencies between human wellbeing, livelihoods and ecosystem services applicable to the area in question and how the development's ecological impacts will result in socio-economic impacts (e.g. on livelihoods, loss of heritage site, opportunity costs, etc.)?	The site is well located between Green Point Main Road and sea Point Main Road, adjacent to the Green Point Urban Park and Sea Point Promenade. Safe and continued access to these public places is important to human wellbeing and livelihoods, and the Cape Town coastline and City are attractive destination places for locals and tourists. The ecological impacts of the proposed mixed-use development are very low, and any minor ecological impacts are not anticipated to negatively impact human wellbeing, livelihoods and ecosystem services significantly. The proposed mixed-use development is intended to positively impact on human wellbeing and livelihoods by increasing residential and retail opportunities and integrating the site with the surrounding retail and residential character.
• Based on all of the above, how will this development positively or negatively impact on ecological integrity objectives / targets / considerations of the area?	The proposed development is not anticipated to impact on ecological integrity targets as the site is previously transformed and does not support any significant biodiversity or habitat.
• Considering the need to secure ecological integrity and a healthy biophysical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the "best practicable environmental option" in terms of ecological considerations?	In this case, the best practicable option in terms of ecological considerations is one that makes optimal use of under-utilised state-owned and already-transformed land in an urban area, reducing the need for further spatial expansion of urban development. Significant negative impacts on the biophysical environment are not anticipated.
• Describe the positive and negative cumulative ecological/biophysical impacts bearing in mind the size, scale, scope and nature of the project in relation to its location and existing and other planned developments in the area?	The proposed development is unlikely to result in any cumulative negative ecological or biophysical impacts given its location on an already transformed site.
What is the socio-economic context of the area, based on, amongst other considerations, the following considerations?	
• The IDP (and its sector plans' vision, objectives, strategies, indicators, and targets) and any other strategic plans, frameworks of policies applicable to the area,	Please see Section E4.2 of the Basic Assessment Report.
• Spatial priorities and desired spatial patterns (e.g. need for integration of segregated communities, need to upgrade informal settlements, need for densification, etc.),	Please see Section C and E4.1 and 4.3 of the Basic Assessment Report: • The proposed development aligns with Policy Section 3 outlined in the Western Cape Provincial Spatial Development Framework, 2014. - Policy S3: Promote Compact, Mixed-use and Integrated Settlements. • The proposed development also aligns with the following policy statements outlined in the City of Cape Town Municipal Spatial Development Framework as part of the municipality's spatial strategies: - Spatial Strategy 1: Plan for economic growth and improve access to economic opportunities.

Guideline question	Response
	- Spatial Strategy 2: Manage urban growth and create a balance between urban development, food security and environmental protection. - Spatial Strategy 3: Building an inclusive, integrated, vibrant and healthy city. According to the 2023 Table Bay District EMF, the site is identified as a Civic Cluster as well as New Development Area, and therefore the proposed development aligns with the local spatial policy.
• Spatial characteristics (e.g. existing land uses, planned land uses, cultural landscapes, etc.)	Please see Section E of the Basic Assessment Report. The proposed development is in keeping with planned land uses for the area, which include high density residential development and inclusionary housing. Existing land uses surrounding the site are similar, with high density residential to the south of the development.
• Municipal Economic Development Strategy ("LED Strategy").	Please see Section E4.3 of the Basic Assessment Report. Local economic development objectives form an integral part of the approved City of Cape Town Municipal SDF. The proposed aligns with Spatial Strategy 1 of the Municipal SDF, which seeks to support economic growth and improve access to economic opportunities.
• Considering the socio-economic context, what will the socio-economic impacts be of the development (and its separate elements/aspects), and specifically also on the socio-economic objectives of the area? - Will the development complement the local socio-economic initiatives (such as local economic development (LED) initiatives), or skills development programs?	Positive socio-economic impacts are anticipated in the form of construction phase employment opportunities and longer-term post-construction phase jobs. Activation of a currently underutilised site through a mixed-use development that includes commercial and institutional uses at ground level as well as formalised public spaces is anticipated to positively affect the immediate area. Please refer to the socio-economic specialist report (**Appendix G3**) for more details.
• How will this development address the specific physical, psychological, developmental, cultural, and social needs and interests of the relevant communities?	The proposed development is in keeping with spatial planning imperatives to maximise the use of land within the urban edge and with a need to improve access to affordable housing close to employment opportunities in the City.
• Will the development result in equitable (intra- and inter-generational) impact distribution, in the short- and long term? Will the impact be socially and economically sustainable in the short- and long-term?	The social and economic impacts are anticipated to be positive in both the short and long term. The provision of residential space, hotels and retail is expected to offer long-term social and economic benefits, providing housing for locals, as well as accommodation and destination retail offerings to attract visitors. Additionally, the development entails the creation of job opportunities through the construction and post-construction phases. By providing job opportunities, local community members will have a chance at improved living conditions, and better quality of life. The proposed development is not anticipated to have any negative long term environmental impacts.
In terms of location, describe how the placement of the proposed development will:	

Guideline question	Response
• result in the creation of residential and employment opportunities in close proximity to or integrated with each other, • reduce the need for transport of people and goods, • result in access to public transport or enable non-motorised and pedestrian transport (e.g. will the development result in densification and the achievement of thresholds in terms public transport),	The proposed development 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. Temporary to permanent employment will also be created for those residing in close proximity during both the construction and post construction phase. The site 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 and is located within walking distance to the Ellerton and Hill bus stops.
• compliment other uses in the area,	The existing retail edge along Green Point Main Road and Sea Point Main Road is characterised by a diverse mix of cafés, restaurants, small-scale shopping centres, and a few franchised food outlets. The proposed development would reinforce and extend this established retail character along the site's main road frontage, contributing to a continuous and integrated streetscape within the broader Sea Point and Green Point context. The City of Cape Town is a popular tourist destination and the provision of destination retail and hotel offerings compliments surrounding uses which attract tourists (e.g. Green Point Stadium). Additionally, the provision for affordable housing addresses the need for residential space in the City close to employment opportunities.
• be in line with the planning for the area,	The proposed development of the site will be in line with the City of Cape Town Municipal Spatial Development Framework (2023) as well as the Table Bay District Spatial Development Framework and Environmental Management Framework (2023). Please see Section E of the Basic Assessment Report.
• for urban related development, make use of underutilised land available with the urban edge,	The proposed site comprises underutilised, transformed land located within the urban edge. The proposed development seeks to optimise the site's development potential through the efficient use and redevelopment of the available land.
• optimise the use of existing resources and infrastructure,	The proposed development will use existing service connections and infrastructure and include upgrades where necessary. Existing infrastructure to be retained on site includes the Sea Point public library, civic centre and forecourt area. The use of the library is to be optimised by the proposed extension, and the proposed upgrade of the minor hall to include café and kitchen facilities is expected to improve the capacity of the services offered by the civic centre.
• opportunity costs in terms of bulk infrastructure expansions in non-priority areas (e.g. not aligned with the bulk infrastructure planning for the settlement that reflects the spatial reconstruction priorities of the settlement),	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, and water connection opportunities.
• discourage "urban sprawl" and contribute to compaction/densification,	The proposed development does not encourage urban sprawl as the erf is located within an existing urban area. Furthermore, the proposed development utilises open, underutilised land and will enable the fullest possible use of the land parcel.

Guideline question	Response
• contribute to the correction of the historically distorted spatial patterns of settlements and to the optimum use of existing infrastructure in excess of current needs,	The development is intended to include affordable market-led housing near the CBD of Cape Town, addressing a significant lack of affordable accommodation near economic opportunities in the city.
• encourage environmentally sustainable land development practices and processes,	The proposed development is intended to promote dense infill development of residential, commercial and retail opportunities, close to economic nodes in an urban area, which is an environmentally sustainable development practice.
• take into account special locational factors that might favour the specific location (e.g. the location of a strategic mineral resource, access to the port, access to rail, etc.),	Key locational factors are the site's location and its close proximity to the CBD in an area of relatively high economic activity. The proposed site has significant space available for development and has access to existing bulk services and infrastructure within an urban area. The site is located close to higher order roads making vehicular accessibility to the site is good. The existing road network is well established and in good condition. The site is well located to access public transport (including MyCiti, Golden Arrow Bus services and taxis) and non-motorised transport (pedestrian and cycle facilities).
• the investment in the settlement or area in question will generate the highest socio-economic returns (i.e. an area with high economic potential),	The proposed development framework includes the proposal of mixed-used buildings, which will promote economic trading opportunities. The development is also expected to stimulate economic activity in the Green Point area through the creation of employment opportunities during both the construction and post-construction phases of the project.
• impact on the sense of history, sense of place and heritage of the area and the socio-cultural and cultural-historic characteristics and sensitivities of the area, and	No impacts on heritage resources are expected. Despite the close proximity to heritage sensitivities on the proposed site, the mixed-use development aims to optimise the use of the site and improve the integrity of the heritage sensitivities on site by retaining the library and civic centre buildings as public spaces. The eucalyptus trees on the eastern side of the site are also to be preserved for their heritage significance.
• in terms of the nature, scale and location of the development promote or act as a catalyst to create a more integrated settlement?	The proposed development intends to provide a more integrated settlement by utilising underutilised developed land by transforming it into a multi-purpose mixed-use development. Furthermore, the development promotes economic activity while also addressing key social needs like affordable housing.
How were a risk-averse and cautious approach applied in terms of socio-economic impacts?	
• What are the limits of current knowledge (note: the gaps, uncertainties and assumptions must be clearly stated)?	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. 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. According to the socio-economic impact assessment undertaken (**Appendix G3** of the draft BAR), the proposed development is expected to generate significant positive socio-economic benefits. These include contributions to GDP and economic output, the creation of substantial temporary and permanent employment opportunities during both the construction and post-construction phases, and the generation of household income through wages earned. Additional benefits include increased government revenue,
• What is the level of risk (note: related to inequality, social fabric, livelihoods, vulnerable communities, critical resources, economic vulnerability and sustainability) associated with the limits of current knowledge?	
• Based on the limits of knowledge and the level of risk, how and to what extent was a risk-averse and cautious approach applied to the development?	

Guideline question	Response
	as well as opportunities for on-site skills development and experiential learning.
How will the socio-economic impacts resulting from this development impact on people's environmental right in terms following:	
• Negative impacts: e.g. health (e.g. HIVAids), safety, social ills, etc. What measures were taken to firstly avoid negative impacts, but if avoidance is not possible, to minimise, manage and remedy negative impacts?	Negative impacts of this nature are not anticipated.
• Positive impacts. What measures were taken to enhance positive impacts?	Positive Impacts: • Amenity value – continuity with the main road interface • Residential, retail and civic uses (including affordable housing and hotel offerings) • Job creation (in the retail and hospitality industry) • Improved sense of place and security (via improved usability of the site for locals and tourists) The positive impacts of the civic cluster on site is to be enhanced by improving the capacity of the library (by extending it), provision of a new crèche/ECD facility to be part of the civic node, and upgrade of the civic centre (new minor hall, addition of kitchen and café facilities, and retention of the major hall).
• Considering the linkages and dependencies between human wellbeing, livelihoods and ecosystem services, describe the linkages and dependencies applicable to the area in question and how the development's socioeconomic impacts will result in ecological impacts (e.g. over utilisation of natural resources, etc.)?	The proposed project addresses the need for affordable housing within the CBD area, utilising already transformed but underutilised land. The development's socio-economic impacts are not anticipated to cause significant ecological impacts.
• What measures were taken to pursue the selection of the "best practicable environmental option" in terms of socio-economic considerations?	The 'best practicable environmental option', which relates to the Constitution's requirement to secure 'ecologically sustainable development' requires the consideration of potential negative impacts, known and unknown, against the socio-economic benefits of development. The negative impacts of the proposed development like noise, dust, vibrations and traffic are short-term and can be mitigated by the implementation of the EMPr and the recommendations of the specialist reports. The visual impacts have been addressed in the design of the proposed concept and impacts mitigated to an acceptable level (refer to **Appendix G2** of the dBAR or the Visual Impact Assessment). The proposed development is also expected to generate significant positive socio-economic benefits (**Appendix G3** of the dBAR– SEIA) Therefore, there are no reasons not to consider the proposed development to be the best practicable option for the site, since it is intended to provide market-led affordable housing in a key area of the city, and activate the main road retail edge to create continuity with surrounding land uses.

Guideline question	Response
• What measures were taken to pursue environmental justice so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons (who are the beneficiaries and is the development located appropriately)? Considering the need for social equity and justice, do the alternatives identified, allow the "best practicable environmental option" to be selected, or is there a need for other alternatives to be considered?	The proposed project addresses the need for housing close to the CBD area, utilising already transformed but underutilised land. Adverse environmental impacts include construction-related noise, dust and vibration (which would be common to any development and are unavoidable, though they can be managed and mitigated), as well as traffic impacts. The latter can be effectively mitigated through the optimisation of traffic signal phasing and timing at key intersections. With these improvements in place, these key intersections are expected to operate efficiently, with sufficient spare capacity available during peak traffic hours. Refer to the Transport Impact Assessment (**Appendix G4** of the draft BAR) for more details. The existing on-site crèche/ECD offers a valued service to the surrounding communities. The proposed concept design includes provision for a new ECD facility on site, thereby considering and responding to the needs of the surrounding community. Similarly, the retention and improvement of civic services on site, namely the library and civic hall, are intended to serve the community. The proposed development was informed by a consultative design process that prioritised local participation and stakeholder engagement throughout the concept design phase. Feedback received during the engagement process was actively incorporated into the design development, helping to create a more inclusive development that is responsive to the needs, concerns, and character of the surrounding community.
• What measures were taken to pursue equitable access to environmental resources, benefits and services to meet basic human needs and ensure human wellbeing, and what special measures were taken to ensure access thereto by categories of persons disadvantaged by unfair discrimination?	The proposed development is not anticipated to impact on access to environmental resources, benefits and services to meet basic human needs and wellbeing – no special measures for access are therefore required.
• What measures were taken to ensure that the responsibility for the environmental health and safety consequences of the development has been addressed throughout the development's life cycle?	An environmental management programme for the construction and operational phase of the proposed development has been developed to address this requirement.
What measures were taken to:	
• ensure the participation of all interested and affected parties, • provide all people with an opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, • ensure participation by vulnerable and disadvantaged persons,	The pre-statutory Public Participation Process to be undertaken is detailed in **Appendix F** of the BAR. Various methods were employed to notify potential Interested and Affected Parties of the proposed project, including media notices, written notifications, and site notices. Opportunities for participation and comment on the draft Basic Assessment Report will be provided to all interested and affected parties in terms of the EIA Regulations.
• promote community wellbeing and empowerment through environmental education, the raising of environmental awareness, the sharing of knowledge and experience and other appropriate means,	Opportunities for participation will be provided to all interested and affected parties throughout the environmental assessment process in terms of the EIA Regulations. Pre-statutory public engagement included an Information Sharing phase during which the public were invited to submit their inputs and shar their knowledge of the site and surrounds. This informed the subsequent project phases and concept design.
• ensure openness and transparency, and access to information in terms of the process,	During the public participation process, information will be made as accessible as possible. This includes the publication

Guideline question	Response
	of all reports on the internet, email notifications, site and media notices, as well as the distribution of correspondence via post or door-to-door delivery to adjacent landowners. Information may also be shared via WhatsApp on request. Transparency will be maintained throughout all assessment and decision-making processes.
• ensure that the interests, needs and values of all interested and affected parties were taken into account, and that adequate recognition were given to all forms of knowledge, including traditional and ordinary knowledge,	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 proposed concept design for the site. Please see Section F and **Appendix F** of the Basic Assessment Report, for details on the Public Participation Process undertaken to date, and to be completed.
• ensure that the vital role of women and youth in environmental management and development were recognised and their full participation therein was promoted.	Participation by all interested and affected parties, including women and youth, will be promoted. Opportunities for engagement will be provided during the environmental assessment process.
• Considering the interests, needs and values of all the interested and affected parties, describe how the development will allow for opportunities for all the segments of the community (e.g. a mixture of low-, middle-, and high-income housing opportunities) that is consistent with the priority needs of the local area (or that is proportional to the needs of an area)?	Housing is an increasing need in the area, and the proposed development is anticipated to provide housing opportunities for a range of household incomes (affordable, middle- and high-income housing opportunities). It is anticipated that the construction phase of the proposed development will generate temporary employment opportunities. Additionally, the hotel and retail components of the proposed development are expected to create permanent employment opportunities during the post-construction phase of the development. The existing crèche caters for children from a wide range of areas, as well as for families who live in the immediate area, and is highly embedded in the local community. The provision for a new crèche/ECD facility on site within the proposed concept design therefore considers the needs of the surrounding community. Similarly, the retention and improvement of civic services on site, namely the library and civic hall, are intended to serve the broader community.
• What measures have been taken to ensure that current and/or future workers will be informed of work that potentially might be harmful to human health or the environment or of dangers associated with the work, and what measures have been taken to ensure that the right of workers to refuse such work will be respected and protected?	The EMPr includes an environmental awareness programme. Health and safety concerns will be addressed by implementation of occupational health and safety legislation. An Environmental Control Officer will be appointed to monitor compliance.
Describe how the development will impact on job creation in terms of, amongst other aspects:	
• the number of temporary versus permanent jobs that will be created, • whether the labour available in the area will be able to take up the job opportunities (i.e. do the required skills match the skills available in the area),	According to the socio-economic impact assessment (**Appendix G3** of the draft BAR), the proposed development is estimated to generate between full-time equivalent (FTE) jobs. The construction phase of the proposed development has the potential to create substantial temporary employment opportunities for those employed in construction and supporting activities. Furthermore, indirect employment benefits are expected to be concentrated in sectors such as building materials manufacturing, transport and logistics, and wholesale and retail trade. The retail and hotel components of the proposed concept design are also anticipated to create permanent employment opportunities within the

Guideline question	Response
	hospitality industry during the post-construction phase of the project.
• the distance from where labourers will have to travel,	The proposed project site is well located in relation to existing movement corridors and public transport networks. It is situated adjacent to the MyCiTi Atlantic Corridor, which provides reliable public transport services connecting Camps Bay, Clifton, Sea Point, Green Point, and the CBD. The site also has convenient access to public transport routes along Green Point Main Road, including Golden Arrow bus services, and is within walking distance of the Ellerton and Hill bus stops. This level of accessibility supports sustainable mobility and enhances connectivity to surrounding areas.
• the location of jobs opportunities versus the location of impacts (i.e. equitable distribution of costs and benefits),	Job opportunities will be for the entire site, with equitable distribution.
• the opportunity costs in terms of job creation	No opportunity costs are anticipated.
What measures were taken to ensure:	
• that there were intergovernmental coordination and harmonisation of policies, legislation and actions relating to the environment, • that actual or potential conflicts of interest between organs of state were resolved through conflict resolution procedures?	Municipal, provincial and national environmental policies and legislation were consulted in the undertaking of this project. Through the consultation of the relevant policies, frameworks, and legislation, the EAP assessed how the re-development project aligns with the existing policy and environmental governance instruments. Moreover, the Basic Assessment process includes consultation with relevant organs of state to obtain their input on the proposed development. Comments received through this public participation process, will be duly considered and addressed to the extent possible, with the aim of resolving issues and incorporating relevant concerns into the assessment and decision-making process.
• What measures were taken to ensure that the environment will be held in public trust for the people, that the beneficial use of environmental resources will serve the public interest, and that the environment will be protected as the people's common heritage?	The public participation process, which is an integral part of the environmental authorisation process, provides a means of managing potential impacts on environmental resources and determining whether the proposed use of resources is in the public's interest. In relation to the site, there are no environmental resources of concern as the site is entirely transformed already. Therefore, the proposed development is not expected to impact the environment as people's common heritage.
• Are the mitigation measures proposed realistic and what long-term environmental legacy and managed burden will be left?	Mitigation measures proposed are reasonable and realistic. No long-term negative legacy is anticipated. Refer to the EMPr (**Appendix H**) as well as section H of the BAR.
• What measures were taken to ensure that the costs of remedying pollution, environmental degradation and consequent adverse health effects and of preventing, controlling or minimising further pollution, environmental damage or adverse health effects will be paid for by those responsible for harming the environment?	Potential impacts associated with the proposed development have been identified and assessed, and appropriate mitigation measures have been recommended. Should Environmental Authorisation be granted, these measures will form part of the authorisation conditions and will be legally binding. Responsibility for the implementation and compliance with any authorisations would lie with the authorisation holder.
• Considering the need to secure ecological integrity and a healthy bio-physical environment, describe how the alternatives identified (in terms of all the different elements of the development and all the different impacts being proposed), resulted in the selection of the best practicable environmental option in terms of socio-economic considerations	See section H of the BAR for a full description of alternatives and selection of the best practicable environmental option.
• Describe the positive and negative cumulative socio-economic impacts bearing in mind the size,	No significant negative cumulative socio-economic impacts are anticipated in relation to the proposed development.

Guideline question	Response
scale, scope and nature of the project in relation to its location and other planned developments in the area?	Instead, the development is expected to contribute positively to the local and regional economy through the creation of employment opportunities and the stimulation of economic activity. According to the socio-economic impact assessment undertaken (**Appendix G3** of the draft BAR), the proposed development is expected to generate substantial positive socio-economic benefits. These include contributions to GDP and economic output, the creation of substantial temporary and permanent employment opportunities during both the construction and post-construction phases, and the generation of household income through wages earned. Additional positive Impacts include: • Amenity value – activate the main road retail edge to create continuity with surrounding land uses • Residential, retail and civic uses on site (including affordable housing and hotel offerings) • Job creation (in the hospitality industry associated with retail and hotel offerings) Improved sense of place and security (via improved usability of the site for locals and tourists)The positive impacts of the civic cluster on site is to be enhanced by improving the capacity of the library (by extending it), relocation of the crèche to be part of the civic node, and upgrade of the civic centre (new minor hall, addition of kitchen and café facilities, and retention of the major hall).