



Site Sensitivity Verification Report

Proposed Mixed-use
Development on Erf 2187, Three
Anchor Bay, Green Point

VERSION: FINAL

DATE: 18 JUNE 2026

PREPARED FOR

City of Cape Town
Property Development Branch



CITY OF CAPE TOWN
ISIXEKO SASEKAPA
STAD KAAPSTAD

PREPARED BY

 **Infinity**
Environmental

Email: 3anchorbay@infinity.capetown

Tel: 021 834 1600

Collingwood Building, Black River Park
2 Fir Street, Observatory, Cape Town

DOCUMENT DETAILS

Proposed Mixed-use Development on Erf 2187, Three Anchor Bay: **Site Sensitivity Verification Report**

APPLICANT

The City of Cape Town

Lance Boyd
Old Granary Building, Harrington Street
Cape Town, 8001

ENVIRONMENTAL ASSESSMENT PRACTITIONER

Infinity Environmental (Pty) Ltd.

Collingwood Building
Black River Park
2 Fir Street
Observatory, Cape Town

Report purpose

The purpose of this Site Sensitivity Verification Report is to confirm or dispute the sensitivity ratings identified by the online DFFE Screening Tool Report for the proposed site (Erf 2187).

VERSION HISTORY

Date	Version
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Authors

K Gilmour, (Cand E.A.P. #2024/8037; Cand Nat Sci #169880)
J Titus, (Cand E.A.P. #2026/20884)
T Solomon, (Reg. E.A.P. # 2019/1671)

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1 INTRODUCTION

1.1 Screening Tool and Protocols for Assessment

The Minister of Environment, Forestry and Fisheries on 5 July 2019 promulgated regulations requiring the compulsory submission of a report generated by the national web based environmental screening tool, when submitting applications for environment authorisation (GN 960 of 2019). The screening tool generates a report based on mapping of environmental sensitivities and on proximity to other features such as defence installations and civil aviation installations. On 20 March 2020, the Minister published Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes in terms of sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998 (GN 320 of 2020). These Procedures prescribe the general requirements for undertaking site sensitivity verification and for protocols for the assessment and minimum report content requirements of environmental impacts for specific environmental themes identified by the screening tool. Further Protocols were gazetted on 30 October 2020 for terrestrial plant and animal species assessment in GN 1150 of 2020.

1.2 Sensitivity Verification

Each set of specialist protocols provides for a Site Sensitivity Verification to be undertaken by an Environmental Assessment Practitioner (EAP) or suitable specialist, prior to commencing with specialist assessment and reporting on the identified themes. The purpose of a site sensitivity verification is to confirm the current use of the land and potential environmental sensitivity of the site, and to compare these with the sensitivity mapped or identified by the screening tool. The outcome of the verification must be recorded in the form of a site sensitivity verification report (**this report**) that is submitted together with the application for environmental authorisation and confirms or disputes the environmental sensitivities mapped by the screening tool. The purpose of the site sensitivity verification is to confirm the actual state of the site as compared with that what has been identified by the screening tool. The site sensitivity verification is intended to confirm or refute the need to undertake specialist studies as identified in the screening report.

This report is prepared in accordance with the requirements of the Protocols as published in terms of GN 320 of 2020 and GN 1150 of 2020. It has been prepared by the EAP (Tarryn Solomon of Infinity Environmental, EAP Reg No: 2019/1671) based on a desktop analysis, site inspections, and other available information.

1.3 Methodology

The site sensitivity verification was undertaken in December 2025 and included the following activities:

- Review of the extensive existing data and information from previous site assessments;
- Site visit (12 November 2024); and
- A desktop review, including:
 - » Satellite imagery using Google Earth Pro, including imagery from 2000 to present,
 - » Aerial imagery from 1926 onward available via the City of Cape Town's GIS; and
 - » The City of Cape Town's Biodiversity Network dated 2025.

This report presents the outcomes of the site sensitivity verification as described above.

2 SITE LOCATION AND LAND USES

The proposed site is located in the southern suburbs of Cape Town, Western Cape, South Africa (Figure 1) and falls within the CCDS (Central City Development Strategy) boundary approximately 1km away from the Central Business District (CBD). The proposed site is zoned as Public Open Space (OS2) according to the City of Cape Town's Integrated Zoning Scheme (2021).



Figure 1: Locality map of the site (Erf 2187) in Three Anchor Bay

The approximately 4.5-hectare 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. The site consists of the Colin Eglin Sea Point Public Library, Pinocchio Creche, Sea Point Civic Centre and Hall, Fives Football Green Point Sports Club, Glen Green Point Sports Centre, Atlantic Green Point Bowling Club, and the Western Province Bridge Centre for the Western Cape Bridge Union (Figure 2). Surrounding amenities within 1km radius of the site which will inform the contextual analysis include the Sea Point Promenade, Green Point Urban Park, various sports clubs, Green Point Athletics Stadium and the Cape Town Stadium (see Figure 3). The locally and internationally popular V&A Waterfront is located approximately 1.5km to the northeast of the site.

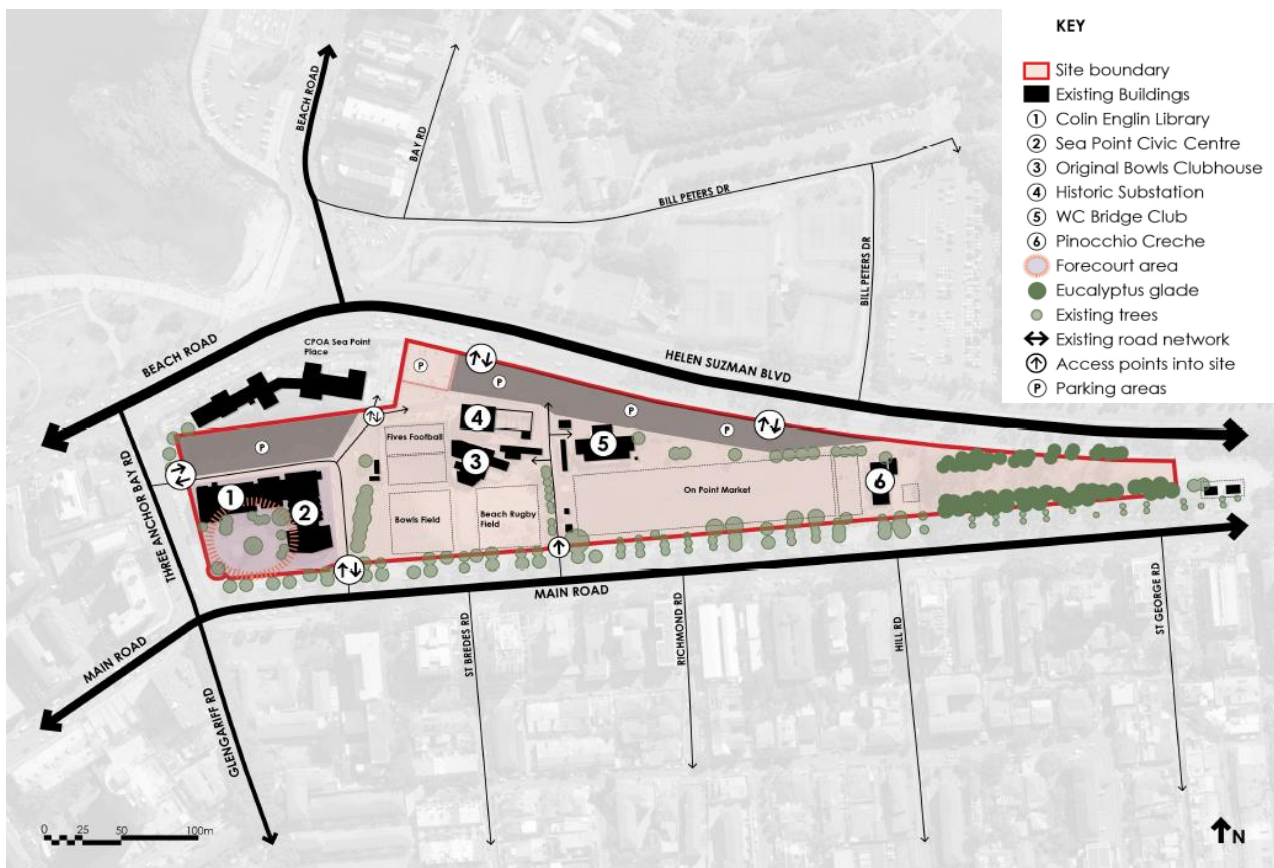


Figure 2: Map of the existing land uses on the site (Erf 2187) in Three Anchor Bay (ACG Architects)

The existing land uses are listed below:

- **The Colin Eglin Sea Point Public Library**

The library is well-used by surrounding communities, particularly high school students from surrounding schools during exam time, with designated quiet sections and a children's section. The library provides the communities with access to books, newspapers and computers.

- **The Sea Point Civic Centre and Hall**

The civic centre and main hall are used for various events (e.g. dance events and weddings). The main hall has a foyer, toilets, offices, staffroom, orchestral pit (now used for storage), cloak rooms and upstairs and downstairs seating space. The minor hall is also used for small events.

- **The Glen Green Point Sports Centre**

The Glen Green Point Sport Centre includes the Atlantic Green Point Bowling Club, Fives Football Green Point and is also used for private events. The club house is derelict having suffered a fire

recently. The bowling greens are no longer in use and some have been transformed into a 5 a-side soccer court leased to the Glen Country Club, some are derelict and the greens at the eastern end, once surfaced with rat, now accommodate a market from time to time.

- **The Western Province Bridge Centre for the Western Cape Bridge Union (WCBU)**

The WCBU is one of the unions in South Africa under the auspices of the South African Bridge Federation which sends bridge players to represent South Africa in the African Bridge Federation and World Bridge Federation tournaments on a regular basis.

- **Pinocchio Crèche**

Pinocchio Crèche is a project branch of the Domestic Workers' Association Educational Trust – a non-profit organisation – founded by the late Mrs Maggie Oewies Shongwe, run by Helen Shongwe-Phillips, and a team of committed qualified educare practitioners and carers.

- **Occasional Public Market**

In the past, the On Point Food Market occurred on weekends, but this activity no longer takes place on the site.

- **Electrical substation**

A large electrical substation is accommodated in a building on the northern boundary of the site, behind the original bowling club house. The building and yard still accommodate electrical equipment, but the development on the site and required electrical infrastructure, may render this building unnecessary to the City of Cape Town electricity supply network in future.

- **Parking areas**

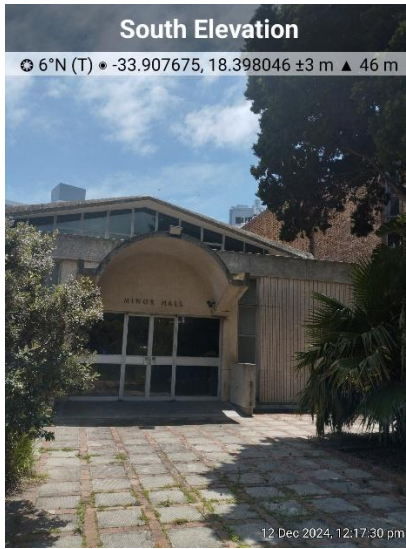
On the northern side behind the former bowls facilities is an open parking area also used by driving schools as a training facility. There is also a fenced parking area adjacent to the CPOA retirement facility located behind the library and civic centre which forms part of the site and is leased by the CPOA. There is also a parking area behind this building that also provides vehicular access to the CPOA facility behind the library.

- **Roads**

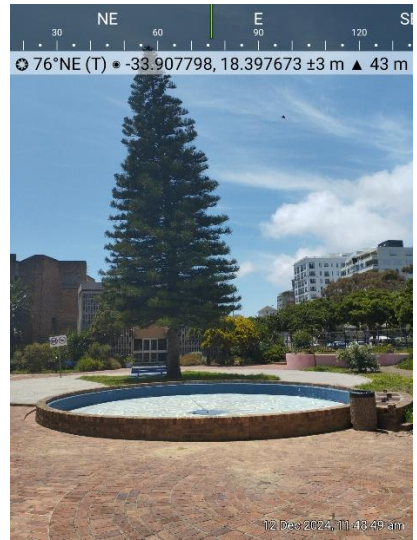
The site is bisected by Bowlers Road roughly through the centre of the site and Bowlers Way to the west gives access from Main Road to the Civic Centre and CPOA facility.



Photograph 1: Sea Point Public Library



Photograph 2: Major Hall part of the Civic Centre



Photograph 3: Forecourt area outside of the library



Photograph 4: Parking area on site



Photograph 5: Atlantic Green Point Bowling Clubhouse



Photograph 6: Western Province Bridge Club



Photograph 7: Electrical substation on the site



Photograph 8: CPOA building adjacent to the site



Photograph 9: Parking area on the northern side of the site



Figure 3: Surrounding amenities in relation to Erf 2187 in Three Anchor Bay

3 NATIONAL ENVIRONMENTAL SCREENING TOOL SENSITIVITIES FOR THE SITE

The Procedures for the Assessment and Minimum Report Content Requirements for Environmental Themes (GN 320 of 2020 and GN 1120 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 Report. These themes include for the subject site:

Table 1: Summary of sensitivity themes

Theme	Sensitivity			
	Very High Sensitivity	High Sensitivity	Medium sensitivity	Low sensitivity
Agriculture			X	
Animal species			X	
Aquatic biodiversity				X
Archaeological and cultural heritage	X			
Civil aviation		X		
Defence	X			
Palaeontology				X
Plant species			X	
Terrestrial biodiversity	X			

In terms of the Protocols, the themes above require a site sensitivity verification by the EAP, followed by specialist assessments for those sensitivities confirmed by the EAP. The sections below provide an overview of the verified site sensitivity.

Other specialist studies unrelated to the identified themes but listed in the screening tool report, included:


- Landscape/Visual Impact Assessment
- Hydrology Assessment
- Socio-Economic Assessment

In terms of the Protocols, the themes above require a site sensitivity verification followed by specialist assessments of confirmed sensitivities. The sections below provide an overview of the verified site sensitivity.

3.1 Agriculture Theme

The screening tool maps a **Medium Sensitivity** for the agriculture theme based on agricultural land capability. This data is based on the National Land Capability Dataset which considers soil type and climate but not the existing land use. This site is located on entirely transformed land, including multiple buildings, bowls and football fields, and tarred parking surfaces. The site is also located within the urban inner core of the City and surrounded by development. Furthermore, the site has not historically been used for agricultural purposes. As such, the likelihood of the proposed development

negatively affecting the agricultural potential of the site is considered negligible, and the site is therefore assessed as having no agricultural sensitivity.

-  The site sensitivity verification **disputes** the Screening Tool 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.

3.2 Animal Species Theme

The site was found to have a **Medium Sensitivity** for the animal species theme and was justified from the identification of the species below:


Invertebrate - *Conocephalus peringueyi* (Peringuey's meadow katydid)

Peringuey's meadow katydid (*Conocephalus peringueyi*) is listed regionally and globally vulnerable due to its small area of occupancy, the Fynbos Biome mountains in the southwestern Cape in the Western Cape Province. The greatest threat to this species is habitat destruction from climate change and/or grazing livestock (SANBI, 2025*; IUCN, 2013). It is not anticipated that this species is present on the site, as the site has been transformed and this species prefers higher elevations. Thus, the site is not an ideal habitat for Peringuey's meadow katydid.

Invertebrate - *Bullacris obliqua* (Bladder grasshopper)

The bladder grasshopper (*Bullacris obliqua*) occupies a small area of the southwestern fynbos regions of South Africa due to habitat destruction from urban development, agriculture and farming. *Erioccephalus africanus* is currently the only confirmed host plant for this grasshopper species which is listed as vulnerable regionally and globally. The proposed site in Three Anchor Bay is completely transformed with no natural vegetation, and it is not anticipated that this species is found on site (SANBI, 2025†; IUCN, 2018).

According to iNaturalist the two above-mentioned species have not been recorded on site, although the Hartlaub's Gull (*Chroicocephalus hartlaubii*) – Least Concern on IUCN Redlist– and Feral Pigeon (*Columba livia var. domestica*) – invasive species (NEMBA Category 3) – have been identified on the site. Existing land users of the site have reported that the Kelp / Cape Gull (*Larus dominicanus vetula*) – Least Concern – are prevalent on the site and use the roofs to nest.

-  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.

3.3 Aquatic Biodiversity Theme

The aquatic biodiversity theme is listed as **Low Sensitivity** due to the site not being located in close proximity to any freshwater ecosystems, and is located behind the development setback, approximately 100 m from the sea./coastline.

* <https://speciesstatus.sanbi.org/assessment/last-assessment/4223/>

† <https://speciesstatus.sanbi.org/assessment/last-assessment/4376/>



The site Sensitivity verification report **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.

3.4 Archaeological and Cultural Heritage Theme

The site is mapped as having a **Very High Sensitivity** for the archaeological and cultural heritage theme due to the site being within 5km of a Grade I Heritage site and 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 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 with 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)
- Saint Bedes HPOZ (south of the site)
- Green Point HPOZ (southeast of the site)



A Notice of Intent to Develop (NID) was submitted to HWC in 2016. HWC requires a visual assessment, built environment analysis, architectural and landscape guidelines and socio-historic assessment to be undertaken to inform the Heritage Impact Assessment. The Heritage Impact Assessment will be conducted by Lize Malan, and Visual Impact Assessment will be undertaken by David Gibbs.

3.5 Civil Aviation Theme

The site is mapped as having a **High Sensitivity** for the civil aviation theme due to the site 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, and between 8 and 15 km of other aviation aerodrome. The Cape Town International Airport is approximately 20 km away from the site and not expected to be impacted by any activities proposed for the site. The proposed site is located around 7 km from Ysterplaat Aerodrome. Impacts on civil aviation radars and/or the civil aviation aerodrome from this proposed development are highly unlikely as development will not erect structures above the height of existing structures in the area.



Although the site is considered to have a High Sensitivity for the civil aviation theme, the Screening Tool did not identify the civil aviation theme for an impact assessment. As recommended, no specialist assessment or compliance statement for civil aviation is required.

3.6 Defence Theme

The site is mapped as having a **Very High Sensitivity** for the defence theme due to the presence of the Ysterplaat Aerodrome approximately 7 km away from the site. As mentioned previously, this development will not involve buildings above the height of surrounding developments or installing any electrical equipment that has the potential to interfere with radar or communication equipment.



Although the site is considered to have Very High Sensitivity for the defence theme, the Screening Tool did not identify the defence theme for an impact assessment. As recommended, no specialist assessment or compliance statement for defence is required.

3.7 Relative Paleontology Theme

The site was determined to have a **Low Sensitivity** for the Relative Paleontology theme in the Screening Tool Report due to features with a low paleontological sensitivity in the surrounding area. The Screening Tool report does not provide metadata indicating the reasons for this classification, the proposed site is surrounded by developments.



The Site Sensitivity Verification Report confirms the Screening Tool Low sensitivity rating for the paleontology theme and a compliance statement is not required.

3.8 Plant Species Theme

The site is mapped as having a **Medium Sensitivity** rating due to the potential presence of the critically endangered (possibly extinct) low-sensitivity plant *Erepsia promontorii* site. 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 transformed due to human activity and site inspections confirmed that no natural indigenous plants remains on the site. Furthermore, according to the NID submitted in 2016, no paleontological resources are expected on the site.




The Site Sensitivity Verification Report **disputes** the screening tool sensitivity rating for the plant species theme and confirms there is no plant sensitivity. An impact assessment or compliance statement is not required.

[‡] Klak, C. & Raimondo, D. 2006. *Erepsia promontorii* L.Bolus. National Assessment: Red List of South African Plants version 2024.1. Accessed on 2026/05/29

3.9 Terrestrial Biodiversity Theme


The site is classified as having a **Very High Sensitivity** rating due to the presence of Peninsula Shale Renosterveld (Critically Endangered). However, the site has been completely transformed and does not contain any natural indigenous vegetation or habitat. Although the site would historically have supported Peninsula Shale Renosterveld, no remnants of this vegetation type remains evident 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 terrestrial biodiversity assessment or compliance statement is required.

3.10 Other studies identified in the Screening Tool Report


3.10.1 Landscape and Visual Impact Assessment

The proposed development will result in a change in the landscape and sense of place.

-  This Site Sensitivity Verification report **confirms** the Screening Tool's identification of the need for a landscape and visual impact assessment due to the site's location. A visual impact assessment has been undertaken by David Gibbs and is attached as **Appendix G2** to the draft Basic Assessment Report.


3.10.2 Socio-Economic Impact Assessment

This proposed development will influence the surrounding socio-economic environment.

-  This Site Sensitivity Verification report **confirms** the Screening Tool's identification of the need for a socio-economic impact assessment, which has been undertaken by Urban Econ and is attached as **Appendix G3** of the draft Basic Assessment Report.

3.10.3 Hydrology Impact Assessment

A Hydrology Impact Assessment was identified by the screening tool report.

-  A hydrology impact assessment will not be undertaken; however, a stormwater management plan has been developed for the site by the project engineers (see **Appendix L3** of the draft BAR).

4 CONCLUSION

This site sensitivity verification report is intended to confirm or refute the sensitivity of the proposed site and thus the need to employ specialists. The specialist reports deemed necessary will be submitted as a part of the EIA process pursuant to the application for environmental authorisation.

Based on the findings of the site sensitivity verification report, it is confirmed that the site has archaeological and cultural heritage sensitivities requiring further assessment. Other specialist studies will include socio-economic, visual and bulk services assessments. The following assessments will be undertaken and appended to the BAR:

- Heritage Impact Assessment (**Appendix G1**)

- Visual Impact Assessment (**Appendix G2**)
- Socio-economic Assessment (**Appendix G3**)
- Stormwater Management Plan (**Appendix L3**)