



Site Sensitivity Verification Report

Proposed Development of the
Granger Bay Precinct and
Reclamation of Land at the V&A
Waterfront in Cape Town,
Western Cape

DEA&DP Ref: 16/3/3/6/7/2/A7/4/3071/25

VERSION: DRAFT

DATE: July 2025

PREPARED FOR
V&A Waterfront Holdings

PREPARED BY

 **Infinity**
Environmental

Email: granger@infinityenv.co.za
Tel: 021 834 1600
Collingwood Building, Black River Park
2 Fir Street, Observatory, Cape Town

DOCUMENT DETAILS

Development of the Granger Bay Precinct and Reclamation of Land at the V&A Waterfront: **Site Sensitivity Verification Report**

APPLICANT

V&A Waterfront Holdings (Pty) Ltd.

Waterway House North,
3 Dock Road,
V&A Waterfront,
Cape Town

ENVIRONMENTAL ASSESSMENT PRACTITIONER

Infinity Environmental (Pty) Ltd.

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

Report purpose

This report is prepared in compliance with the requirements of 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.

VERSION HISTORY

Date	Version
July 2025	Draft

Authors

Olivia Murgatroyd B.Sc. Hons, Cand. E.A.P. #2024/8454, Cand. Sci. Nat. #169424

Jeremy Rose B.Sc. Hons., Reg. E.A.P. 2019/11116, Pr.Sci.Nat 120148

CONTENTS

DOCUMENT DETAILS	2
The Proposed Expansion of Granger Bay Precinct at the V&A Waterfront: Site Sensitivity Verification Report	2
Authors	2
1 Introduction	4
1.1 Screening Tool and Protocols for Assessment	4
1.2 Sensitivity Verification	4
1.3 Methodology	4
2 site location and land uses	5
3 National Environmental Screening Tool Sensitivities for the site	5
3.1 Agricultural Theme	6
3.2 Animal Species Theme	6
3.3 Aquatic Biodiversity Theme	7
3.4 Archaeological and Cultural Heritage Theme	7
3.5 Civil Aviation Theme	8
3.6 Defence Theme	8
3.7 Relative Paleontology Theme	8
3.8 Plant Species Theme	8
3.9 Terrestrial Biodiversity Theme	9
3.10 Other studies identified in the Screening Tool Report	9
3.10.1 Landscape and Visual Impact Assessment	9
3.10.2 Marine Impact Assessment	9
3.10.3 Hydrological Assessment	9
3.10.4 Socio-Economic Impact Assessment	9
4 Conclusion	10
5 References	10

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 (Jeremy Rose of Infinity Environmental, EAP Reg No: 2019/1116,) based on a desktop analysis, site inspections, and other available information.

1.3 Methodology

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

- Review of the extensive existing data and information from previous environmental impact assessments of the subject site;
- Visits to the site; 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 project site forms part of the V&A Waterfront and is located within the Granger Bay Precinct, which lies west of Beach Road and north of Granger Bay Boulevard near Cape Town's Central Business District (CBD). The V&A Waterfront is situated in Cape Town along the Table Bay coast, spanning an area of approximately 123 hectares (ha) and set against the backdrop of the working harbour. The area includes the main commercial zone with its shopping mall, hotels, restaurants, and entertainment venues, as well as historical sites such as the Two Oceans Aquarium and the Zeitz Museum of Contemporary Art Africa (MOCAA). The V&A Waterfront has been developed since the 1990s around the Victoria and Alfred Basins, themselves dating back to the 19th century as part of the Cape Town Harbour. Road access is possible from various major routes including the N1 and N2 freeways, and the Helen Suzman Boulevard (M6) which connects the area with the Atlantic seaboard.

The project site includes:

- » A portion of Erf 173712 seawards of the 100m setback from the highwater mark;
- » A portion of Erf 177853 (undeveloped land between Erf 173712 and the highwater mark); and
- » Land to be reclaimed from the sea below the highwater mark, with the east breakwater - being approximately 140m offshore of the present shoreline.

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
- Marine 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 Agricultural Theme

The screening tool maps a **Medium Sensitivity** for the agriculture theme based on agricultural land capability. These data are based on the National Land Capability Dataset which considers soil type and climate but not the existing land use. This site is located near the central business district in an entirely transformed area, and includes areas of coastline completely unsuited for agriculture.



The site sensitivity verification **disputes** the Screening Tool Rating of Medium Sensitivity for the agricultural theme and confirms the agricultural theme to be non-existent. Therefore, no agricultural assessment or compliance statement is required.

3.2 Animal Species Theme

The site was mapped to have a **High Sensitivity** for the animal species theme based on the mapped distribution of the species below:

Aves – *Hydroprogne caspia* (Caspian Tern): Although the Caspian Tern is globally distributed, it is regionally vulnerable due to its restricted number of breeding locations and susceptibility to the effects of anthropogenic disturbances and extreme weather such as egg collection, predation by domestic dogs and flooding (Martin and Randall, 1987; du Toit et al., 2003; Underhill, 2000). This species is concentrated at sheltered bays and estuaries along the coastline, and at large permanent waterbodies (Brooke 1984). Breeding season is from October to January in the Western Cape Province, both the male and female excavate and create a shallow scrape in sand, gravel, soil or pebbles, and line the nest with dry vegetation (Hockey et al., 2005). The Caspian Tern eats mainly fish and forages around 3 to 20 meters above clear and shallow water. It is unlikely that this site would be favorable breeding habitat for this species as it has been transformed significantly and does not include suitable beaches.

Invertebrate – *Conocephalus peringueyi* (Peringuey's Meadow Katydid): Peringuey's Meadow Katydid is endemic to the Western Cape Province of South Africa, particularly in the fynbos biome, and is only known from the mountains of the southwestern Cape of the Province. Due to the small extent of occurrence, this species is listed as regionally vulnerable. Significant threats to this species include habitat destruction due to livestock grazing and habitat shifts associated with climate

change. This species will not be found on site as the area is transformed and does support suitable habitat.

Invertebrate – *Bullacris obliqua* (Bladder grasshopper): Bladder grasshoppers are endemic to the fynbos biome in the south-western regions of South Africa, specifically the west coast of the Northern Cape and Western Cape Provinces. This species has a very small, estimated area of occupancy (<2000km²) and has an extremely fragmented population due to habitat destruction and extensive urban development hence its description of regionally vulnerable (IUCN, 2018). This species will not be found on site as the area is transformed and does support suitable habitat.



Despite the screening tool not identifying species of conservation concern expected to be present on the site, a marine impact assessment, inclusive of a marine mammal specialist study will be undertaken to address the impacts on marine animal species.

3.3 Aquatic Biodiversity Theme

This site is mapped as having a **Low Sensitivity** for the aquatic biodiversity theme as there are no freshwater aquatic sensitivities near the proposed development site. Marine aquatic biodiversity will be addressed in the Marine Impact Assessment.



The sensitivity rating in the Screening Tool confirms that there is no sensitivity for the aquatic biodiversity theme because there are no freshwater sensitivities near or on the proposed development site. As recommended by the Screening Tool no specialist assessment or compliance statement for aquatic biodiversity is required.

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. There are multiple heritage sites within 1km of this site justifying the assigned sensitivity, including

- Fort Wynyard (135m away),
- Somerset Hospital (356m away),
- New Laboratory Green Point Common (351m away),
- Old Time Ball Tower Breakwater Prison (520m away),
- Robben Island Embarkment Building (617m away), and
- The Clock Tower (846m away).


Additionally, land reclamation will take place and form a part of the proposed site, potentially impacting on marine archaeological heritage resources. A specialist will be appointed to submit a NID to Heritage Western Cape, on the basis of which a heritage impact assessment will be undertaken.



This site sensitivity rating in the Screening Tool **confirms** the Very High Sensitivity rating for the Archaeological and Cultural Heritage theme. A Notification of Intent to Develop has been submitted to Heritage Western Cape and SAHRA will be consulted during the Scoping process A heritage impact assessment inclusive of a visual impact assessment and a marine archaeology assessment will be conducted, led by Cindy Postlethwayt.


3.5 Civil Aviation Theme

The site was determined to have a **Medium Sensitivity** for the civil aviation theme as it is between 15 and 35km from a civil aviation radar and between 15 and 35km from a major aviation aerodrome. The proposed site is located around 10km west of Ysterplaat Aerodrome and about 16km northwest of Cape Town International Airport. Impacts on civil aviation radars and/or the civil aviation aerodrome from this proposed development are highly unlikely as development will not erect any structures creating an obstacle to aviation.

-  This Site Sensitivity Verification **disputes** the Screening Tool sensitivity rating for the civil aviation theme as the proposed development is consistent with the description of a low sensitivity rating. Therefore, a compliance statement is not required.

3.6 Defence Theme

The site is mapped as **Very High Sensitivity** for the defence theme in the Screening Tool Report due to the presence of a military and defence site. The screening tool does not provide background information justifying this classification, and there is no formal guidance available on methods for determining a site's defence sensitivity. It is likely that the historic military base Fort Wynyard, that is located less than 1km from the proposed site, is the justification for the very high defence theme. The proposed development is designed sensitively in relation to the Fort and other heritage resources, and responds to the historic and heritage value of this defence site.

-  This Site Sensitivity verification **disputes** the Screening Tool sensitivity rating for the defence theme and confirms that the site has a low defence sensitivity. Therefore, a compliance statement is not required. Heritage aspects of the Fort will be addressed in the Heritage Impact Assessment.


3.7 Relative Paleontology Theme

The site is mapped as **Medium Sensitivity** for the Relative Paleontology Theme in the Screening Tool Report due to features with medium paleontological sensitivity. The Screening Tool report does not provide metadata indicating the reasons for this classification. Although this activity will require excavation and land reclamation, the proposed site is transformed and previously disturbed.

The heritage and archaeology assessments will consider the palaeontological sensitivity rating and if relevant will obtain specialist input.


3.8 Plant Species Theme

The site is mapped as having a **Low Sensitivity** rating due to the presence of low sensitivity plant species. This proposed site is highly modified due to human activity and thus no indigenous vegetation remaining.

-  The Site Sensitivity verification report disputes the Screening Tool sensitivity rating for the plant species theme and confirms there is no plant species sensitivity. A compliance statement is not required.

3.9 Terrestrial Biodiversity Theme


The site is mapped as having a Very High Sensitivity rating due to the location of the site within the historical extent of Peninsula Shale Renosterveld, now critically endangered and only found on the lower northern slopes of Devils Peak, Table Mountain and Signal Hill. Although Peninsula Shale Renosterveld was presumably historically present on parts of the proposed site, it is now entirely transformed.

-  The Site Sensitivity Verification report disputes the Screening Tool sensitivity rating for the terrestrial biodiversity theme and confirms there is no terrestrial biodiversity sensitivity. Therefore, no impact 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 due to the reclamation of land and proposed development of the Granger Bay precinct.

-  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 on the coast. A visual impact assessment will be undertaken by Megan Anderson.


3.10.2 Marine Impact Assessment

The proposed site will fall within the marine environment and will involve land reclamation.

-  This Site Sensitivity Verification report **confirms** the Screening Tool's identification of the need for a marine impact assessment due to the site's location and proposed land reclamation. A marine impact assessment will be undertaken by Anchor Environmental.


3.10.3 Hydrological Assessment

This proposed development involves land reclamation which will influence hydrodynamics of the nearshore marine environment.

-  This Site Sensitivity Verification report **confirms** the Screening Tool's identification of the need for a hydrological assessment due to the site's location and proposed land reclamation. A stormwater management plan will form part of the engineering services assessments, and an oceanographic specialist review will be undertaken.

3.10.4 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 will be undertaken by Urban Econ.

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 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, cultural heritage, visual, marine and socio-economic sensitivities requiring further assessment. Other specialist studies will include oceanographic, transport, and bulk services assessments.

5 REFERENCES

Brooke R K (1984). South African Red Data Book–Birds, Foundation for Research Development: CSIR, 1984.

UCN (2018). The IUCN Red List of Threatened Species. Version 2018-1.

Martin and Randell (1987). Numbers of waterbirds at a commercial saltpan, and suggestions for management. South African Journal of Wildlife Research.

Toit M, Boere G C, Cooper J, De Villiers M S, Kemper J, Lenten B, Petersen S L, Simmons R E, Underhill L G, Whittington P A (2003). Conservation assessment and management plan for Southern African coastal seabirds. Avian Demography Unit and Conservation Breeding Specialist Group.

Underhill (2000). The Eskom Red Data Book of Birds of South Africa, Lesotho and Swaziland, Edited by Barnes, K N, BirdLife South Africa: 45-47.