

**From:** [Amy Hill](#)  
**To:** [chair@obs.org.za](mailto:chair@obs.org.za)  
**Cc:** [2020mancomm](#)  
**Subject:** RE: Stakeholder Comment Period: BAR for the Proposed Redevelopment of the River Club in Observatory  
**Date:** Monday, 10 February 2020 17:01:43

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Dear Leslie

The legislated BA process is governed by timeframes which make it almost impossible to grant extensions. Therefore, while we can guarantee that all issues raised in comments received by 14<sup>th</sup> February will be documented and responded to, and submitted with the BAR to DEA&DP, we cannot guarantee that issues raised in submissions made after the 14<sup>th</sup> of February but before 28<sup>th</sup> February will be responded to, as this may delay submission of the Final BAR. However, we would submit such comments to DEA&DP for their consideration.

It is worth noting that:

- Changes to the BAR and EMPr have been *underlined and italicised* for ease of reference; and
- Other than the supplementary heritage and supplementary planning reports, no other reports have been introduced since release of the pre-application BAR.

Kind regards

**Amy Hill** BSC (Hons)(Biodiversity and Ecology)  
Environmental Consultant

 **srk consulting**

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**From:** Leslie London <[chair@obs.org.za](mailto:chair@obs.org.za)>

**Sent:** Sunday, 09 February 2020 16:42

**To:** Amy Hill <AHill@srk.co.za>

**Cc:** 2020mancomm <2020mancomm@obs.org.za>

**Subject:** Re: Stakeholder Comment Period: BAR for the Proposed Redevelopment of the River Club in Observatory

Dear Amy

I am writing to SRK to request an extension for I&APs to submit comments on the revised BAR. As you may know, many of the I&APs have been extremely busy with other legal and procedural processes related to the proposed River Club Development.

The revised BAR contains new information which I&APs have to be able to digest and formulate measured responses.

Most I&APs are community members with full time job and do not have the time in their working hours to spend reviewing documents, which are my count, involve 194 pages of actual report plus 47 appendices totalling over 2000 pages (not including the 11 appendices with comments from I&APs on the BAR).

Secondly, there are a lot of files that appear out of sequence, which makes it different to understand the layout of the overall report. For example, I am puzzled by HWC comments on the HIA should be sequestered in a separate appendix E1, along with water, waste, electricity and sanitation, since it surely belongs with the HIA documents.

Then, of course, it is difficult for I&APs to fathom that you have listed all documents from way back to the Draft Scoping Report, some of which have changed but some of which have not, so it makes it that much harder for the I&AP.

Lastly, none of the reports actually earmark what is different from previous reports and shift that burden of discovery onto the I&AP. That is a huge amount of work.

For all these reasons, I do not believe a deadline of 30 days for comment on such a humungous set of documents is reasonable.

I am therefore writing to you to ask that the deadline for comments be extended by a further 30 days to allow I&APs a reasonable opportunity to read, review and make informed comments.

Please advise urgently

Thanks

Leslie London

On Mon, 13 Jan 2020 at 16:07, Amy Hill <[AHill@srk.co.za](mailto:AHill@srk.co.za)> wrote:

Dear Stakeholder

Notice of Stakeholder Comment Period on Basic Assessment Report and Tabling of Heritage Impact Assessment Supplementary Report at Heritage Western Cape Impact Assessment

Committee: Proposed Redevelopment of the River Club in Observatory, Cape Town

*DEA&DP Reference Number: 16/3/3/6/7/1/A7/17/3217/19*

*HWC Case Number: 15112504WD1217E*

*DWS Reference Number: WU9026 River Club and 16/2/7/G22/A/11*

The Liesbeek Leisure Properties Trust (“the LLPT” or “the proponent”) operates the River Club in Observatory, Cape Town which, together with portions of adjacent properties, is collectively referred to as the site. The River Club is currently operated as a commercial facility, mainly for recreational (golfing) activities and conferencing. The LLPT is proposing to redevelop most of the site for residential, commercial, institutional and associated uses (the project or the development). The majority of the site is owned by the proponent.

SRK Consulting (South Africa) Pty Ltd (SRK) was appointed to undertake the environmental process required in terms of the National Environmental Management Act 107 of 1998, as amended (NEMA) in support of applications for Environmental Authorisation (EA), Heritage Approval and Water Use Authorisation. The application for EA was submitted to the Department of Environmental Affairs and Development Planning (DEA&DP) on 6 January 2020, and the revised Basic Assessment Report (BAR) is now being released for a post-EA-application round of public review.

If you have received this notice directly you are registered as a stakeholder for the above environmental processes.

We would like to inform you of the availability of the revised BAR for stakeholder comment. The revised BAR can be accessed electronically on the SRK website at the following link: <https://www.srk.co.za/en/za-river-club-redevelopment-bar>. The report will also be available for public review and comment at the River Club in Observatory, the Observatory Public Library and the offices of SRK Consulting in Rondebosch, Cape Town from 13 January 2020.

Issues raised by stakeholders on the pre-EA-application BAR have been summarised and responded to, and the BAR has been revised taking stakeholder comments into account where appropriate. All comments are appended to the revised BAR. Stakeholders are now invited to submit comments on the revised BAR and/or send relevant details (see below) so that SRK can register you on the project database if you are not registered already. Noting that issues already raised are documented and responded to, we encourage stakeholders to submit comments relating to issues that have not yet been raised during the engagement process.

Stakeholders must submit comments to the contact person on or by **14 February 2020**. Submissions should refer to the DEA&DP, HWC and DWS reference numbers (listed above), and must include your name, contact details (specifying the preferred method of notification, e.g. e-mail), and an indication of any direct personal, business, financial or other interest which they have in the application.

To submit any (new) comments on the BAR or for further information please contact Amy Hill at SRK Consulting: Tel: (021) 659 3060, Fax: (021) 685 7105, or Email: [ahill@srk.co.za](mailto:ahill@srk.co.za).

We look forward to your input and response to the document.

Also note that Heritage Western Cape (HWC) Impact Assessment Committee (IACom) will table a Heritage Impact Assessment Supplementary Report on 28 January 2020 at 10h00 on the First Floor of the Protea Assurance Building, Green Market Square (refer to correspondence to stakeholders from SRK dated 6 December 2019). As a stakeholder you

have a right to be present at the HWC IACom meeting, and to make representations when the matter is considered should you wish to do so.

Kind regards

**Amy Hill** *BSC (Hons)(Biodiversity and Ecology)*

Environmental Consultant



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