

[your address and date]

Ms Amy Hill
SRK Consulting
183 Main Road
The Administrative Building
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Rondebosch
7700

Dear Ms Hill [instruction: send to Amy Hill AHill@srk.co.za and copy to ldg@obs.org.za]

Comments on the revised River Club Basic Assessment Report

I write to indicate my objections to the proposed development on the River Club.

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

I am resident at [give your address].

My interest in the matter is [why are you submitting this objection?]

I note the deadline for comments on the revised Basic Assessment Report was to be the 14th February 2020. However, the dense materials of the BAR make it very difficult for community members to comment in such a short time. I therefore hope this objection is relayed to the DEADP in time to be considered.

My objection is based on the following:

General Comments:

1. The River Club is part of the Two Rivers Urban Park (TRUP) which is a unique conservation area that should be graded as a Heritage site of provincial or national importance. It should be preserved as such and is not suited for this type of development.

Planning issues:

2. The application is much too dense. The scale of the development is inappropriate to the area. It will forever destroy the sense of place of the area. Once the concrete is laid and the buildings dominate the visual landscape, there is no recovery possible of intangible heritage lost.
3. The buildings on site will be an eyesore standing out of the river plain.
4. The massive earthworks required to lift the development out of the flood zone will make the project uneconomical unless the buildings are huge. That is why the development is so dense and damaging.
5. The area is a flood plain and should have a large development on it.

6. The proposed benefits (e.g. better walkability, public access) could be achieved by a different kind of development.
7. The contribution to affordable housing is miniscule (4% of the development) and targeted at households earning a combined income of between R22 000 per month and R30 000, which means that those most in need of housing, will not be able to access accommodation here.
8. The feasibility of the project must take account of all social and environmental factors – not just financial feasibility.
9. The current Spatial Development Plan for Table Bay does not permit development in the flood plain. The proposed Draft Two Rivers Local Spatial Development Framework has not been adopted and cannot be used to justify this development.

Flooding

10. The hydrology report does not use the latest Climate Change data to take account of the impact of sea rise on likelihood of flooding. It does not make explicit its assumptions and parameters. We are not satisfied with the experts opinion that the flooding risk is 'minimal'.
11. The hydrologists approached residents in Ossian Rd to 'engage' them with a view to the developer paying for measures to mitigate flooding which would affect their properties. Why would the developer be willing to pay for mitigation if the risk of flooding is minimal?
12. Reports to the hydrology report does not make explicit its assumptions and parameters urged that an archaeological survey be conducted of the area because of the heritage importance of the site. No such surveys have been conducted.

Heritage

13. The Heritage Impact Assessment dismisses the intangible heritage of the site, linked to its history of resistance to colonial intrusion, by arguing that the River is only heritage resource worth preserving. The HIA downplays the open, low-lying, green, riverine character of the whole site which is intimately linked to area as a historic frontier or point of containment, conflict and contact. This gives the site exceedingly high historic and symbolic significance.
14. The Impact Assessment Committee of Heritage Western Cape has slammed the HIA as inadequate for failing to recognise the intangible heritage of the site. They say that the HIA is trying to rationalise the development post-hoc, and I agree with their assessment.
15. The River Club owners have not engaged with the full spectrum of Khoi leaders and have chosen to engage only with leaders who are willing to support their application. The HIA does not even mention the fact that the majority of Khoi leaders are very strongly opposed to the development.
16. The First Nations Report that was commissioned for the HIA is highly biased. The consultant failed to include certain First Nation grouping, the methodology raised concerns (no ethical consent for interviews), and there was overlap and confusion between what the consultant was doing for DTPW and for the River Club. HWC IACOM

concluded that the engagement of I&APs did not comply with section 38(3) of the NHRA.

17. There is no mention in the First Nations Report or the HIA that the confluence of the two rivers, of particular spiritual importance for the Khoi, will be blocked from any view of the mountains by huge buildings.
18. The memorial centre and eco-corridor proposed with have buildings up to 44m in height on either side. This will adversely impact on the experience and functions of such a centre.
19. The existing River Club building has some heritage significance but this is discounted in the HIA
20. The HIA ignores the fact that HWC indicated previously that the River Club must be considered in the context of the whole of TRUP.
21. The HIA fails to assess the development's impact on the site's open green qualities. It says that because the site is a golf course and has therefore been transformed over the past 80 years, there is no importance to the open space. However, this does not make it acceptable to destroy what remains.
22. To cite IACOM: *The fact that the development will pay for the Berkeley Road extension "should in no way be used as mitigation to argue for sustainable and economic benefits" but, rather, "the heritage significance of the site should be the primary informant"*.
23. The HIA failed to consider alternatives meaningfully.
24. The memorial/museum is designed to create meaning rather than enhance existing significances on the site.
25. IACOM said "The bulk and mass of the development proposal does not respond to the site as a living heritage." I agree.

[add other objections as you wish – biodiversity, traffic, etc]

I submit these comments and ask that they be shared with DEADP.

Please confirm receipt and that you will forward my concerns to DEADP by the 28th February.

Yours truly

[name]