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Attention: Amy Hill – Environmental Consultant

Comments on the Revised Draft Heritage Impact Assessment for the Proposed Redevelopment of the River Club and the Rehabilitation of Watercourses at Adjacent Properties in Observatory, Cape Town (HWC Case No.: 15112504WD1217E, DEA&DP Ref. No.: 16/3/3/6/7/2/A7/17/3104/16 and DWS Ref. No.: 16/2/7/G22/A/11)

The owner and operator of The River Club in Observatory, Cape Town, the Liesbeek Leisure Properties Trust, LLPT, wishes to redevelop the site for residential, commercial, institutional and associated uses. LLPT appointed SRK Consulting (South Africa) Pty Ltd, SRK, to undertake the Scoping and Environmental Impact Reporting process, and as an interested and affected party, the National Research Foundation (NRF), a statutory entity established in terms of the National Research Foundation Act (Act No. 23 of 1998) acting through its National Facility the *South African Astronomical Observatory (SAAO)*, is required to pass comments on the HIA.

The SAAO was deeply concerned with the proposal as presented in the plan dated November 2017 and noted its comments in the reply dated 6 March 2018.

Herein, the SAAO wishes to present its comments, concerns and objections to the revised HIA report, dated 19 March 2019, in particular emphasising the heritage impacts of the proposals on the SAAO National Heritage Site, and quite possibly a future UNESCO Cultural World Heritage Site.

Background

The SAAO is a working National Research Foundation facility with over 100 staff, a residential site of half dozen households, located on the historic property directly adjacent to The River Club. The Observatory was established in 1820.

The SAAO has considerable historical, scientific, aesthetic, architectural and social significance. On 21 December 2018 the South African Heritage Resources Agency (SAHRA) declared the site, in terms of section 27 (5) of the National Heritage Resources Act (No. 25 of 1999), as a National Heritage Site. SAHRA states that SAAO has played a highly significant role in scientific research as the *oldest permanent observatory in the Southern Hemisphere*. The Observatory is associated with several astronomical advances of international significance since the 1830s. It has considerable aesthetic significance with several architecturally notable buildings and a distinctive dome typology set within a wooded landscape at the confluence of the Liesbeek and the Black Rivers. The Main Building and McClean dome structure forms the central shaft of space in a North-South orientation.

Following the recent declaration as a National Heritage Site, there is a strong possibility for the Observatory to be declared also a UNESCO Cultural World Heritage Site. The process is

beginning for the site being first included on the Tentative List, and the SAAO has been strongly encouraged to rapidly go forward with the process by SAHRA, by the SA government, by the International Astronomical Union, and by UNESCO contacts. This wide support for the initiative is motivated by the small number of Cultural Sites in South Africa (only 5, Robben Island being one of them), and by very few astronomical sites globally eligible, realistically, for the prestigious list – there currently are a dozen historical astronomy related UNESCO sites, such as the Giza Pyramids and Stonehenge, but only one observatory still in use, albeit mostly as a museum, the Greenwich Royal Observatory.

The SAAO site also forms an integral part of Two Rivers Urban Park (TRUP), which has been identified by Heritage Western Cape (HWC) as Grade II in terms of its pre-colonial and early colonial history, particularly regarding its associations with colonial expansion and Khoekhoe resistance during the mid-17th century.

The visual heritage impact of the proposed River Club development

The revised draft HIA correctly emphasises the outstanding heritage significance of the Observatory as a recently declared national heritage site with reference to its historical, scientific, architectural and aesthetic value. It also emphasises the Observatory's sense of place as a 'centre piece' on a spur of land at the confluence of the Liesbeek and Black Rivers and an integral component of the Two Rivers Urban Park concept.

However, the findings of the HIA that the development proposals contained within the Preferred Riverine Corridor Alternative will have an acceptable level of heritage impact on the Observatory, are strongly opposed.

Concerns relate specifically to the position, scale and form of proposed development in Precinct 1 as depicted in Figures 23 and 24 of the HIA report and discussed further below. Additional concerns relate to the proposed 9 storey buildings in the easternmost sector of Precinct 2, and how this may impact long views from the northern periphery of the Observatory site following the north-south axis of its main historic core and central shaft of space. However, it is accepted that further visual-graphic information may alleviate concerns relating to Precinct 2.

Notwithstanding the positive heritage impacts of the proposed rehabilitation and pedestrian linked Liesbeek Riverine Corridor forming the western boundary of the Observatory, these impacts do not outweigh the high negative impacts of the proposed development in Precinct 1 on the landscape setting of the Observatory. The heritage indicators informing the proposals and aimed at mitigating the heritage impact of the scale and form of building footprints facing onto the riverine corridor and alongside the Observatory are insufficient and over-reliant on the mitigating effect of a 40m development setback from the riverine corridor and visual screening by the Observatory tree canopy.

This visual-spatial field has been underemphasised in the HIA with an overemphasis on the visual screening effect of trees. Trees have a life span and the Eucalyptus trees largely contributing to the Observatory tree canopy are in the process of being replaced with water wise tree species ecologically suited to its riverine setting and likely to result in a significant reduction in the height of the existing tree canopy, which already is lower than the proposed building heights (p. 95 of the HIA report, 'Section C'). *It is absurd to use the height of the existing tree canopy as a heritage informant to determining the appropriate height of the adjacent development.* Furthermore, the trees do not form a uniform screen, whatever their height.

With reference to p. 95 of the HIA report ('Section B') the heights of the proposed buildings in Precinct 1 are shown in comparison to the Black River Office Park. These buildings are roughly at the same height. However, the concerning fact is the vertical angle at which the closer obscuring buildings will limit the visual-spatial field currently experienced from the Observatory. The effect is compounded by the 'urban wall' created by the proposed densely packed individual buildings blocking any horizontal viewing angle between adjacent buildings from any single proximity vantage point at the Observatory.

Hence, the scale and form of proposed development in Precinct 1 presents an 'urban wall' interface with the Liesbeek Riverine Corridor and the Observatory and results in the hemming in of the landscape setting of the Observatory. It stands in dramatic contrast to the loose arrangement of Observatory buildings set within a green matrix and tree canopy well suited to the concept of a parkland setting associated with the adjacent riverine corridors.

Finally, it should be made clear that the visual-spatial field of the Observatory is much greater than the cadastral boundaries of the site. It is defined by its stand-alone qualities embedded within a matrix of green and conceptualised by *the very nature of the work of an observatory as being outward looking*. This visual-spatial field is experienced from the periphery of the Observatory as well as from the outside looking towards the site from various vantage points. The current visual-spatial field contributes significantly to a sense of quietude of the Observatory within an urban metropolitan context.

Other concerns

SAAO is concerned that the raising of the level of the River Club area by 2-3 metres above the existing ground levels by necessity would cause more flooding on the lower lying SAAO areas, both on the Liesbeek and Black River sides. Although we are not experts in the subject, we wish to continue to raise the issue and have the concerns regarding the hydrology assessments, raised by others also, addressed.

It needs to be ascertained whether the proposed building heights of the individual buildings in Precincts 1 & 2 are within the building and zoning restrictions of the National Building Regulations and by-laws of the City of Cape Town.

The SAAO shares many concerns raised by other local stakeholders regarding lack of respect for pre-colonial and more recent history, for sense of place and space, for careful preservation of unique local flora (*Moraea Aristata*) and fauna (*Amietophrynus Pantherinus*), for the need of a green breathing area amidst an otherwise highly urbanised area, and dangers of over-commercialisation of a significant heritage area. As noted in our response dated 6 March 2018, SAAO does not oppose smart and sensitive development in the area, but we are far from convinced that the concerns raised by us, and many other stakeholders, are properly addressed with the new HIA draft, dated 19 March 2019, which continues to propose dense and high buildings in the area, in close proximity to the SAAO.

In summary, the proposed dense and high buildings are the source of SAAO's main concern: the drastic loss of the visual-spatial field of the Observatory, the hemming in, by means of an 'urban wall', of a National Heritage site, and a possible future global Cultural Heritage site. The argument raised against these effects in the recent HIA draft rests solely on the screening effect of the current Eucalyptus tree canopy, which we argue is absurd as a heritage informant given the constantly decreasing number of these trees at SAAO.

Sincerely



Prof. Petri Vaisanen
Director, South African Astronomical Observatory