



6 March 2018

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**Attention: Amy Hill – Environmental Management Consultant**

**Comments on the Heritage Impact Assessment (HIA) 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 following are comments and concerns of SAAO:

The SAAO is deeply concerned with the proposal as presented in the plan dated November 2017. As a historic Observatory established in 1820 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, it should come as no surprise that SAAO has many concerns.

The SAAO has considerable historical, scientific, aesthetic, architectural and social significance and has been graded by South African Heritage Resources Agency (SAHRA) as Grade I. The site 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 SAAO has very high historical significance as a scientific institute dating to the early 19th century and the first permanent observatory in the southern hemisphere. It is associated with a number of astronomical advances of international significance from the 1830s. It has considerable aesthetic significance with several architecturally significant 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 the central shaft of space.

The report argues (p.50) that the SAAO is of “low contextual significance” to the proposed project, since it is “rendered invisible” by the trees on-site (also pp.58,76). First of all, the statement is patently false, the SAAO is *not* invisible from the River Club. Secondly, and more importantly for the purposes of the proposal, the logic of the invisibility argument is strange: surely the point should be that the *River Club site* is very clearly visible *from the Observatory*. And indeed it will be even more so with 4 – 12 story buildings and more lights. The SAAO strongly objects to being brushed aside as an irrelevant factor in considering the impact of redevelopment of The River Club. In fact, Observatory staff regularly use the facilities offered by the River Club for official and recreational purposes and the two sites together form an integral part of the neighbourhood.

We note that the plan makes mention on several times of a proposed SKA building on a portion of Erf 26423. It is occasionally mentioned in justifying the planned redevelopment of the River Club (for example, on p.63, when discussing the no-go alternative it is argued that the proposed SKA building would be isolated and out of place without the proposed River Club development; on p.76, when mentioning that the future SKA building south of the site masks the views of the development from that direction). This is very misleading. SKA, or in fact SAAO (the South African Radio Astronomy Observatory) is a facility of the NRF since 2017, and we know very well that our mutual umbrella organisation NRF does *not* have approval from the Government to building anything, whether on our portion of land at the current entrance to the River Club, or elsewhere. It is unsure when such an approval would be given, and where SAAO would be located when that time comes. In fact, one of the options discussed internally is a location further up the Observatory hill, in between SAAO and Valkenberg Hospital, which would make more sense in many respects, and would not impact The River Club area. In another inaccuracy, p.8 of the Urban Design Framework document mentions the future SKA building to be in the region of 8 storeys, while the preliminary plans by SKA are in fact a 3 storey building.

The essential point is that the SKA (SAAO) building remains a future possibility, very far from an “inescapable fact” (p.72) or “inevitability” (p.52), that any proposal arguments could be based on. The indication of the SKA (SAAO) building on a portion of our property, Erf 26423, should therefore be excluded from any discussion of the proposed development at the River Club.

SAAO is also concerned that the raising of the level of The River Club area by several metres by necessity would cause more flooding on the lower lying SAAO areas, both on the Liesbeek and Black River sides. The proposal claims there would be no consequences, but SAAO was informed that the hydrology assessment may have been flawed. We obviously are no experts in the subject, but would wish to hear the latter concerns addressed.

Apart from the SAAO specific concerns above, the most important of our general concerns is the loss of a park-like area in a strategic region of the City, with likely rapid commercial and residential development in the coming years. The SAAO is of the opinion that the TRUP area to which the River Club belongs is precisely *that* area which should be intelligently developed into a green open area for breathing in the middle of the growing Observatory, Salt River, Maitland, and Paarden Eiland areas. We have seen other options for the usage of the River Club area much closer to the ideals we maintain, of respecting history, sense of place and space, with sight lines to the surrounding areas from our historic hill, while at the same time taking development, both commercial and residential opportunities for people working in the vicinity seriously. By no means do we oppose smart and sensitive development of the area – however, the current proposal is too dense, too high, and does not sit well, in our opinion, as a neighbour to our historic Observatory site. We appreciate the thought going into the green areas around the river banks, but, frankly, it is not open space, and that is what we as a stakeholder feel is crucial to retain in the middle of an otherwise urbanised area (highly urbanised in the future).

Finally, we list several issues which should be kept in mind during major construction of any kind at the River Club:

- Development within the TRUP should comply with development plans being put in place by the City of Cape Town and the Western Cape Government as part of their broader planning strategy.
- Building heights limited to the zoning restrictions and limited to heights not overpowering the sense of a historic Observatory on a hilltop next to it.
- Traffic congestion
  - There is already tremendous traffic congestion at the intersection of Liesbeek Parkway and Station/Observatory road during peak hours. Construction vehicles will heavily impact on the traffic flow and the road surface.
  - Access to SAAO, Valkenberg Hospital, and other businesses down the narrow Observatory Road should not be restricted.
  - A separate construction vehicle access to the River Club site should be provided elsewhere during the construction phase.
  - Access of heavy vehicles should be limited to periods outside of peak hours.

- Terrestrial Flora
  - A plant species that is unique to the area on SAAO, *Moraea Aristata* bulbs, may be negatively affected.
- Aquatic Fauna
  - The breeding pools of the threatened Western Leopard Toads, *Amietophrynus pantherinus*, in the water ways may be negatively affected. *We are concerned that no mention is made of them in the project proposal.*
- The noise and vibration levels anticipated during construction phases will negatively affect the residents and activities of the SAAO, and must be mitigated.
- If the flow of the Liesbeek River is returned to its natural course or altered in any way, it will directly impact on portion of our property on Erf 26423 resulting in erosion due to the flow dynamics of the altered course of the river. The effects must be studied prior to any such work and mitigated.
- Security concerns due to influx of various contractors must be addressed.

Sincerely,



Prof. Petri Vaisanen  
SAAO Director