

ANNEX 2: OCA COMMENTS ON BUILDING HEIGHT AND MASS AND VISUAL IMPACTS ON SENSE OF PLACE AND HERITAGE VALUES

In the 2018, application, it was stated that indicative building heights in Precinct 1 ranged from 15m to 44m above base level (average height 27m) while in precinct 2, heights ranged from 27m to 44m with average height of 40m.

In 2020, Precinct 1 heights are said to be lower at 11m to 33m (though they appear to be between 19m and 44m), while precinct 2 has received additional bulk with building 32m to 46m high. It has also changed from a precinct of 10 buildings to larger and fewer (8) buildings. It is stated on page 218 by the case officer that “the applicant has indicated that their desired anchor tenant has largely influenced the change in building massing.”

The table below is from the Case Officer’s submission, reflecting heights in the current application that went before the MPT.

The following 18 buildings are currently anticipated for the Riverine Corridor Alternative (refer to Figure 3):

Precinct:	Building:	Anticipated Floor Area	Maximum Floors	Anticipated Height (masl)
1	1		<u>4</u>	<u>21.5</u>
1	2		<u>4</u>	<u>19.9</u>
1	3		<u>4</u>	<u>19.9</u>
1	4		<u>4</u>	<u>19.9</u>
1	5		<u>6</u>	<u>29.9</u>
1	6		<u>5</u>	<u>23.4</u>
1	7		<u>4</u>	<u>19.9</u>
1	8		<u>7</u>	<u>33.4</u>
1	9		<u>7</u>	<u>33.4</u>
1	10		<u>9</u>	<u>43.9</u>
1	11		<u>8</u>	<u>33.5</u>
Subtotal Precinct 1:		~60 000 m²	N/A	N/A
2	<u>12</u>		<u>6</u>	<u>36.4</u>
2	<u>13</u>		<u>5</u>	<u>31.9</u>
2	<u>14</u>		<u>10</u>	<u>44.7</u>
2	<u>15</u>		<u>6</u>	<u>36.4</u>
2	<u>16</u>		<u>8</u>	<u>42.6</u>
2	<u>17</u>		<u>10</u>	<u>46.6</u>
2	<u>18</u>		<u>10</u>	<u>46.6</u>
Subtotal Precinct 2:		~90 000 m²	N/A	N/A
Total Precinct 1 and 2:		150 000 m²	N/A	N/A

Para 16 (pages 218 and 219) of the Case Officer's report describe the massing as follows:

"Buildings located along Berkley Road extension are proposed to be the highest on the site. Buildings along Berkley Road extension are proposed to be about 46m high in certain instances and will define the public realm/edges of the site and overlook the public domain. This may be commensurate with the future prominence of Berkley Road as a main thoroughfare."

Of the 8 buildings, four are between 31.9 and 36.4m high, while the rest are all over 42m high, ranging from 42.6m to 46.6m high.

1. What is not sensitive about this redistribution?

The AFMAS report spends a lot of time talking about the importance of the confluence of the two rivers. For example, see below

"Places where rivers are coming together, are special places. Those rivers are connected with people and memory. Water holds memory. So, wherever rivers are coming together, at that point is a ceremonial place. So, the Two Rivers, at that point, is one of them, because of the rivers coming together there. So that space holds a huge memory." (p19)

"The confluence of the Black River and the Liesbeeck River, that embankment area is the place where the Khoi would engage in marriage ceremonies and burial rites, cremation and these kinds of things. It's also a political hotspot, because that's where the tribes would gather and meet... So symbolically, confluences for the Khoi, had a tremendous resonance." (p19)

So, it is clear that the confluence of the Liesbeek and Black rivers is of special significance for the Khoi. Even the developer's AFMAS report admits that. The Case Officer refers to "the area at the confluence of the Liesbeek and Black Rivers should be an area of open space being the point at which an informal bridge was located serving as a crossing toward the east historically. The intention therefore to decanalise the Liesbeek River canal could be incorporated into the memorializing in this vicinity of the site." (page 225).

However, the confluence of the two rivers under the new development is going to have a set of large buildings in close proximity – a very large building (building 18) within 50m of the confluence (see diagram 1 below, taken from the Case Officer document, page 218). The front of the building is 36.6m tall while the back of the building is 46m tall, and behind the building is another 46m tall building (building 17m). Behind that, another 42.6m high building perpendicular to the lie of the first two buildings.



Suggested change to building form – precinct 2

Diagram 1 – Layout of Precinct 2, Case officer report page 218 (overlay)

How might this look visually? The Visual Impact Assessment (Annexure C9) has not been updated since it was completed in 2017, so what that study presents are the visual impacts of the original design which has now changed. However, the buildings in the original design were 23m tall in the front and 41m behind (Diagram 2 taken from the BAR documents). As is clear from diagrams 2a and 2b below, this means that the visual representation from 2017 probably understates the likely impact since the building nearest the confluence is now 13m taller in front and 5 m taller behind.

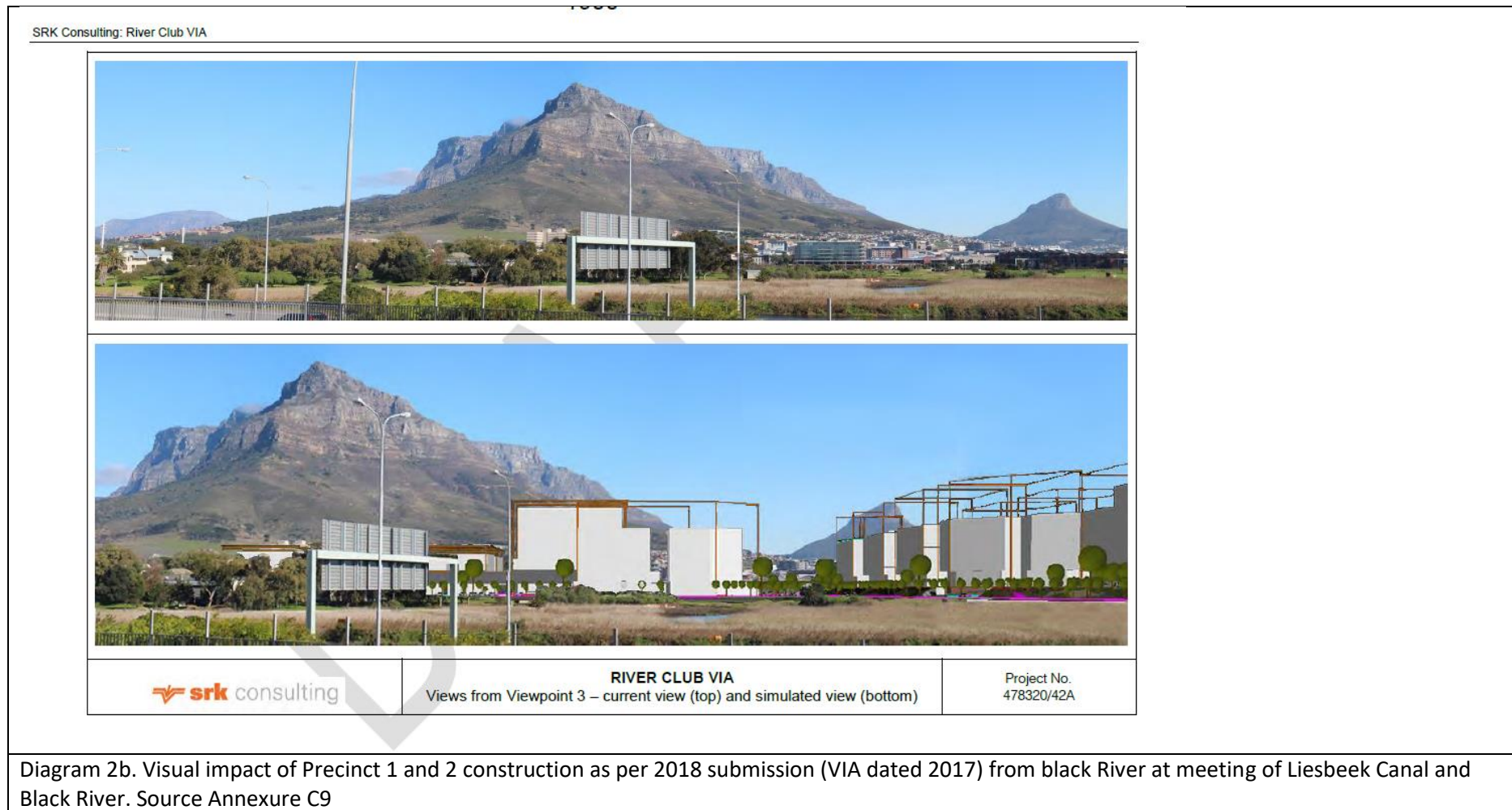
SRK Consulting: River Club VIA



RIVER CLUB VIA
Views from Viewpoint 2 – current view (top) and simulated view (bottom)

Project No.
478320/42A

Diagram 2a. Visual impact of Precinct 1 construction as per 2018 submission (VIA dated 2017) from black River at the point of Berkley Rd crossing. Source Annexure C9



How exactly are ceremonies, which have significant spiritual resonance, going to take place in the shadow of buildings 36 to 46m tall?

Secondly, as can be seen more clearly in Diagram 3 (taken from the BAR application as it is better resolution), the confluence of the Rivers will now have a major road passing some 10 to 20 metres away. Thus any rituals or ceremonies performed at this juncture will be very public and exposed not only to

people watching from the 36 m building but potentially from vehicles crossing the Berkeley Road bridge to be built. Besides loss of any privacy, there will likely be considerable noise, fume and dust pollution, along with risk of discarded garbage and cigarettes in proximity to this site.

This does not seem to be sensitive bulking of the precinct. The 'respect' shown to the SAAO (by reducing bulk in Precinct 1) does not appear to be extended to First Nation interests linked to using the River for ceremonial purposes.



Figure 3: Preferred Development Layout

Diagram 3: Layout of the preferred development alternative. Source Basic Assessment Report Part 1 (BAR documents)

2. Views from the River

The TRUP Fist Nations Report was commissioned by the Directorate Special Projects, PGWC: Department Transport and Public Works (ref K001/19) as a supplement to a Heritage Impact Assessment for the Two Rivers Local Spatial Development Framework in 2019. The report emphasises the importance of visual connections with Lion's Head as part of ceremonial activities for the First Nations. These quotes below (page 22 of the report) illustrate how important it is for the Lion's Head to be seen.

"When it comes to the equinox, there's a phenomenon that happens. The sun sets on Lion's Head. ...you can only see it from that point from the Two Rivers. Only from there. We had a ceremony then. When it comes to the time around the equinoxes, you find that the sun sets on the head of the lion. So, on those days, something is happening in the cosmology of the Khoi and their worldview."

"There's also a !Nau [ceremony] when some of the leaders are taken through a process when they are given their positioning within the tribe - given their title... 'gamdanab.' 'Danab', is the head and 'gam' means lion in the Khoi language. 'Danas' also means head. So 'gamdanab' or 'danas,' would be lion's head. [When the leader is given their position in the tribe, they're given the title, lion's head.] This is when the lion [metaphorically the tribe] is crowned. The lion is crowned when the sun sets on Lion's head."

"The lion is of great significance in Khoi mythology and folklore. Just think about it. These people lived their code systems with lions. Specifically, the black-mane lion."

"I feel we should speak to the memory of lions being here. How a mountain was given a name like lion's head because of the lion's presence and all the lions that used to be here. And also, how that space with the sun sitting on the head with the equinoxes... I call that the crowning or some coronation of the lion. So that space at the Two Rivers, where you can see that happening in March and September, those are huge days of ceremonies that should be held in that space, because you can't see that in any other place. Only from there."

The Case Office notes (page 225) that "Where heritage resources exist, view corridors to the heritage resource should be provided. As far as possible heritage resources should be commemorated by creating places of memory." Since Heritage Western Cape has noted that "The site's open, green qualities as a remnant of landscape that has considerable intangible historic and cultural heritage significance" are its "most Important heritage resource" (HWC final comments para 77) and since the Khoi's connection to the landscape is irrevocably bound up with their identity, you would expect that sensitive redistribution of bulk would take into account the need for visual connection to the mountain.

However, it is clear that the bulk and massing of Precinct 2 means that the point at which the confluence of the Rivers is located, it will be impossible to view Lion's Head from the River Bank. The buildings are located between the confluence and Lion's Head. You would be standing 40-50 away from an edifice 36m

high, with a further edifice of 46m at the back, which will effectively block any view of the Lion's Head. This has not been considered by the planners, or the developers, even though this point was referred to in IAP objections to the 2018 rezoning application. It is unclear how this could be considered 'sensitive.'

3. The eco-corridor and amphitheatre.

The developers make considerable effort to intimate that Lion's head will be visible from the eco-corridor and the media centre. For example, Diagram 5 attempts to illustrate that viewing Lion's Head will be possible from the eco-corridor. However, it is clear from both Diagram 4 and 5 that the visibility of Lion's Head is severely restricted to a narrow interval of views between the two precincts, since it is flanked by very tall buildings. Looking towards Lion's Head, the tallest building to the right is 36m tall and to the left is 45m tall.



Illustration 14: View looking west (Planning Partners, Fig. 5a, p15); circled area shows the position of the proposed cultural centre, amphitheatre and gateway

Diagram 4: View of cultural centre, amphitheatre (Source: source: Annexure 8c HIA Supplementary Information December 2019 overlay page 1690)



Illustration 17: View looking west down the eco-corridor past the cultural centre to Lion's Head (Vivid Architects, Power Point Presentation, 26 Nov 2019, Slide 20)

Diagram 5: Proposed view of Lion's head from eco-corridor (source: Annexure 8c HIA Supplementary Information December 2019 overlay page 1691).

Movement towards the confluence of the Liesbeek and Black Rivers in a northerly direction will immediately cause one to be shielded from Lion's Head by the bulk of the buildings in precinct 2. It is a very narrow range of space in which Lion's head is visible.

Secondly, it is evidence from the Site Plans that the amphitheatre, intended for cultural and ceremonial activities, amongst other purposes, will be in full view of occupants of the very large buildings nearby – most closely those in the precinct 1 building 7 (which houses the cultural centre on the ground floor) but also buildings 12, 13 and 16, and from further afield, 17 and 18. Given that current Khoi ceremonies are conducted for Khoi participants and not ‘on display to the public’, it is unclear how this set up, and particularly the bulking of very large buildings in Precinct 2, represents sensitivity in relation to conduct of Khoi traditions and rituals, since it will be effectively in public.

The supplementary Heritage Report Dec 2019 (Annexure 8c) notes that the Amazon campus “is located next to Berkley Road extension where greater heights are appropriate, although the heights are staggered to articulate the massing.” Facing onto the amphitheatre, there is no staggering – a building of 32m height and one of 42m height – as described, Amazon is recognised for its standard rectangular shapes.

4. The Views from the SAAO

Diagram 6 illustrates the views from the SAAO towards Lion’s Head and Signal Hill. The visual connectedness of the Observatory with Signal Hill (the noon day gun) is historic and a key element of the SAAO’s National Heritage Status. While the developers claim the view will not be obstructed, the image in the diagram shows the extent to which the line of sight is restricted. While the developers do not provide any visual images of the views from the SAAO further northwards towards precinct 2, it should be noted that the most obvious intrusion on the Precinct 1 skyline is building 10 which is 44m high. Note that in precinct 2, half of the buildings are 44 m and will thus intrude on any views from the SAAO.



Diagram 6: Views from SAAO Admin building roof. (source Annexure 8c HIA Supplementary Information December 2019 overlay page 1691)

Maintaining the visual connection with the mountain and between the SAAO is consistent with the Table Bay District Plan which speaks of maintaining the interface between the City and Table Mountain, retaining view corridors and scenic vistas and avoiding monolithic structures that block views.

This is supported by comments of the EMD in its comment that, “although the revised proposal has reduced proposed building heights in proximity to the SAAO, EHM still has concerns with the overall heights of the proposed development and how this will impact negatively on the cultural landscape, sense of place as well as the SAAO itself” and that “EHM is of the belief that the visual impact of the current proposal to be highly negative due to the scale of the proposed buildings, footprint of the development and heights of the proposed buildings.” (overlay page 2958).

The SAAO is still opposed to the development, despite reduction in heights in Precinct 1, because of the importance of the visual-spatial field of the Observatory as being greater than the cadastral boundaries of the site

5. Views of the Riverine Valley from the Mountain

Lastly, the MPT completely ignored the landmark character of the site as part of a riverine valley viewed from the mountain.

HWC noted in their final comments “the HIA has still not placed the River Club site within the context of the wider TRUP, and has downplayed the open, low-lying, green, riverine character of the site which contributes to the intangible heritage experience.” (para 49)

Moreover, the EMD comments on the Visual Character of the Site agree with those of the Cape Institute for Architects who describe it as a site that “functions as an important urban threshold, characterised by the openness of the area and the network of watercourses crossing it. This character sets it in contrast to the urban fabric that surrounds it, and makes, along with the extended context, a unique place within the city. Many of the buildings and uses that are already located “between the rivers” are located here precisely because of the threshold quality the area offers. The proposed development does not acknowledge the unique and symbolic “threshold role” that the site plays, both in its formal layout, scale, and in the uses that are being proposed.” Overlay page 2937

The Rondebosch and Mowbray Planning and Architecture Committee made a submission to the MPT which argued that the valley line of the Liesbeek River is readily identifiable in the topography of the area as a valley corridor with strong place-making associations. The proposal to locate the scale (mass and height) of development being proposed in the middle of this valley line is totally contrary to responsible planning, environmental, heritage and urban design principles. See Diagram 7 below

Submission to the MPT : Proposed Rezoning of the River Club Site



Diagram7: View of Liesbeek Valley from Rhodes Memorial

In general, the case officer seems to write off any effort to maintain views, as in her comment “The extent to which views across the site can be preserved is debatable noting that the property is located within an urban environment” on overlay page 218. However, the Table Bay District Plan notes the importance of maintaining such view, as does the Tall Building Policy, which notes that “the location of tall buildings must protect the key views to Table Mountain, other mountain ranges such as Kogelberg/Helderberg and the sea from public spaces and key public places.”