



TO: OBSERVATORY CIVIC ASSOCIATION  
THE GORINGHAICONA KHOI KHOEN TRADITIONAL INDIGENOUS COUNCIL

15 July 2021

**LETTER OF SUPPORT FOR RECOGNITION OF HERITAGE AND ENVIRONMENTAL SIGNIFICANCE OF LIESBEEK SITE**

1. The Centre for Environmental Rights is a non-profit public interest environmental law organisation based in Observatory, Cape Town. We are committed to defending the right of communities and civil society organisations to an environment not harmful to health or wellbeing for present and future generations.
2. The Centre for Environmental Rights hereby expresses its support for the judicial review application brought by the Observatory Civic Association and the Goringhaicona Khoi Khoen Traditional Indigenous Council challenging the rezoning of the River Club site next to the Liesbeek River located in the City of Cape Town Metropolitan Municipality.
3. The National Environmental Management Act 107 of 1998 (NEMA) requires all development to be socially, environmentally and economically sustainable. One of NEMA's sustainability principles is that the disturbance of landscapes and sites that constitute the nation's cultural heritage be avoided, or where it cannot be altogether avoided, such harm is minimised and remedied.
4. We recognise the significance of the proposed development site as including a river, wetlands and a floodplain and the importance of functional water ecosystems for climate change resilience of our City. It is imperative that any new development complies fully with all planning, heritage and environmental laws – particularly so in light of the recognised cultural, historic and biodiversity significance of the particular site.
5. We therefore express our support of this legal challenge and add our voice to concerns regarding the social and environmental sustainability of the proposed development.

Yours faithfully

**CENTRE FOR ENVIRONMENTAL RIGHTS**

Per: 

**Melissa Fourie**  
**Executive Director**

Cape Town: 2<sup>nd</sup> Floor, Springtime Studios, 1 Scott Road, Observatory, 7925, South Africa  
Johannesburg: G/F the Cottage, 2 Sherwood Road, Forest Town, Johannesburg, 2193, South Africa  
Tel 021 447 1647 (Cape Town)  
[www.cer.org.za](http://www.cer.org.za)