

OBSERVATORY  
Civic Association

28<sup>th</sup> February 2018

Stephen Townsend  
Heritage Practitioner  
River Club Development

Dear Stephen Townsend

**Feedback on the Heritage Impact Assessment (HIA) regarding the development of the River Club (Erf 151832), Observatory, Cape Town**

Thank you for presenting to the OCA last month the revised Heritage Impact Assessment report on the River Club development. As requested, we provide you with the following concerns to include in the feedback for Heritage Western Cape. Although there are many more concerns about the development, we only include here matters which we believe to be directly relevant to a Heritage Impact Assessment. In these comments, we make reference to previous reports and documents well known to you.

1. **We believe that the HIA severely underplays the issue of the sense of Open Space affected.** The density of the development makes it impossible to retain **the sense of open space** as recommended in the O'Donoghue report (see page 33: "The enhancement and preservation of the continuity of the ecological and open space systems is one of the key informants for the development of this site"; and page 34: "The proposed development will change the nature and character of the site. It is therefore vital that the buildings and spaces are designed to be in line with design indicators, ensuring the definition and activation of the significant open space system.").

In contrast, the HIA seems to dismiss any Open Space arguments as follows: Page 43: "Although the river club site is effectively a recreational area and a golf course, is has a park like quality (green open space) which is a quality shared by the broader Liesbeek – Black River corridor. This however belies that fact that much of the land has been subject to prior transformation" and Page 46: "While it can be argued that the golf-course contributes to the sense of open space, it is in actual fact an entirely a person-made landscape that contributes little to the natural qualities of the confluence. It is therefore asserted that the river is the primary physical and symbolic heritage resource in proximity to the site. It is this that needs to be celebrated, enhanced and if need be, proclaimed. Provided this is done adequately, and the Raapenberg wetlands conserved, development of the site is justifi able."

We disagree fundamentally with the idea that because an open space has been degraded in the past, it would be acceptable to further denude the open space of its character as an open space. Certainly, re-developing the river is no substitute for the presence of an open space. We would like to see a more careful consideration of the nature of the area as an Open Space than currently given credence in the report.

2. We believe the HIA has not paid sufficient attention to **the visual implications** – both in terms of the **views from the site** and **views of the site** from surrounding areas. The density of the development makes it impossible to **retain the mountains and other views** as captured in the O'Donoghue report (page 34: She notes the visual connections to Table Mountain, Lion's Head, Signal Hill, and most notably Devil's Peak and concludes tha "It is therefore vital that the buildings and spaces are designed to be in line with design indicators, ensuring the definition and activation of the significant open space system." Her diagram (pasted below) make it clear where the visual vectors lie.)



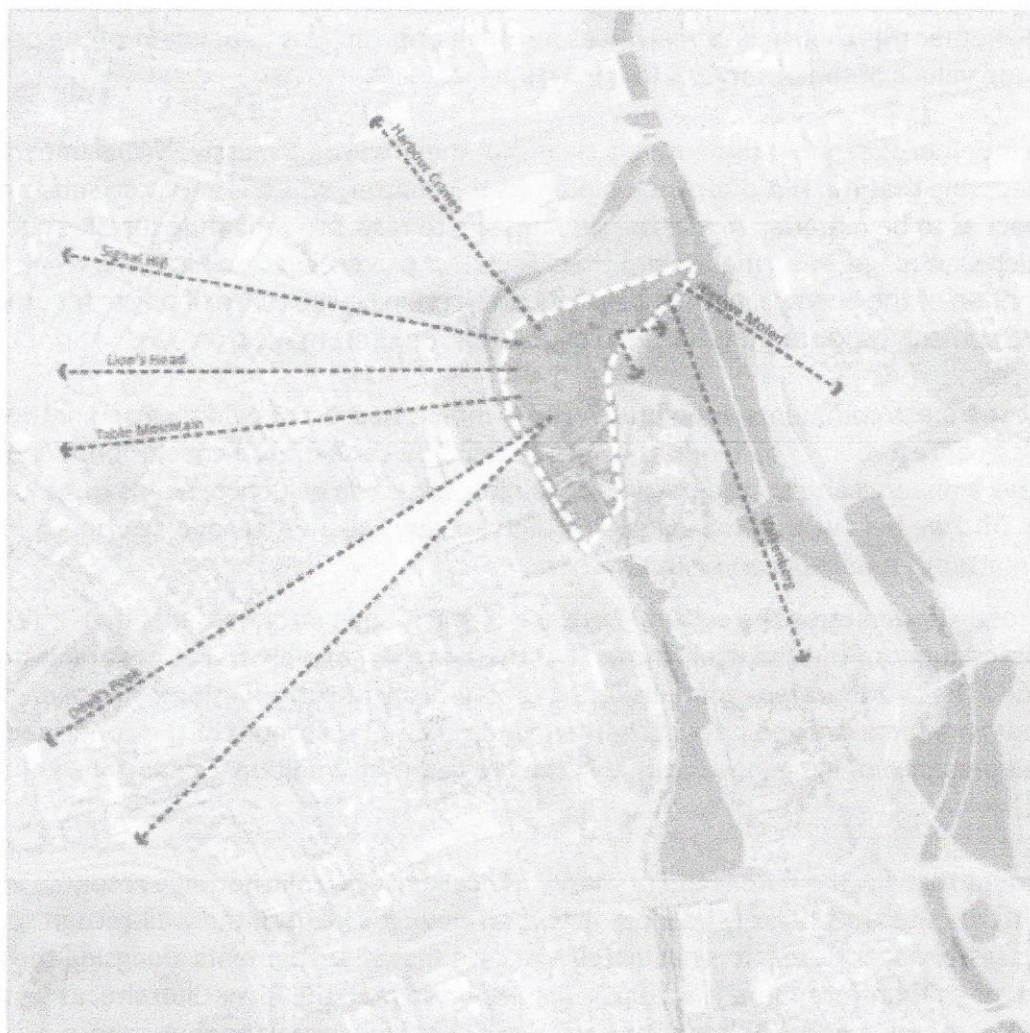


Figure 37: Dominant views from and through the site, Urban Concepts 2016(2)

While the HIA briefly refers to O'Donoghue's comments, it actually makes no follow up on those comments at all. All the HIA states is that the site will be "irrevocably" altered by the SKA building and the Berkley St extension. Neither the SKA building nor the Berkley St extension are necessarily fundamental to the River Club development. In particular, we fail to understand why both are accepted as a given when approvals for such developments have not been secured and are themselves highly problematic. The HIA report seems content to simply repeat the report commissioned by the SKA in that "It is self-evident that this sense of place will be transformed by the SKA building, the development proposed, and the Berkley Road Extension." This very closely parallels the SKA VIA which says "Unavoidably, the proposed development will significantly transform the site and very immediate surrounds."

We question how an HIA submitted to HWC can make such assertions about being self-evident and unavoidable? There are particular interests who would like these to happen and would like to believe they are a given. As a result, the HIA totally ignores the issue of the views **FROM the site** to the Mountains.