



Our Ref: HM/ CAPE TOWN METROPOLITAN/ OBSERVATORY/ TWO RIVERS
URBAN PARK BASE LINE HERITAGE STUDY –
OUDE MOLEN ERF 26439 RE ALEXANDRA ERF 24290 RE
VALKENBURG ERF 26439 RE, ERVEN 118877,160695 THE OBSERVATORY
ERF 26423-0-1RIVER CLUB ERF 151832 NDABENI ERF 103659-0-2 RE

Case No.: 16071903WD0721M

Enquiries: Waseefa Dhansay

E-mail: waseefa.dhansay@westerncape.gov.za

Tel: 021 483 9533

Date: 3 May 2017

INTERM COMMENT
**In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape
Provincial Gazette 6061, Notice 298 of 2003**

TWO RIVERS URBAN PARK BASE LINE HERITAGE STUDY – OUDE MOLEN ERF 26439 RE ALEXANDRA ERF 24290 RE VALKENBURG ERF 26439 RE, ERVEN 118877,160695 THE OBSERVATORY ERF 26423-0-1RIVER CLUB ERF 151832 NDABENI ERF 103659-0-2 RE, OBSERVATORY. SUBMITTED IN TERMS OF SECTION 38(8) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)

The matter above has reference.

Heritage Western Cape is in receipt of your application for the above matter. This matter was discussed at the Impact Assessment Committee (IACom) meeting held on 12 April 2017.

Ms Atwell gave a presentation to the Committee and thereafter the applicants and various interested and affected parties were given an opportunity to make representation to the Committee and took part in the discussion.

Ms Atwell verbally confirmed that application was being made in terms of the provisions of s38(8) of the NHR Act.

It was formally agreed on that the Committee would go into closed session in order to frame its response.

Amongst other things, the following was discussed:

The very competent and informative baseline study was noted and commended, although certain gaps were identified. These were primarily in respect of the following:

- Lack of discussion of the estuarine system as a whole and particularly in respect of the area to the north of the site and its history.
- The National Khoisan Legacy Project in particular the understanding that this site may form an important aspect thereof. It is further understood that this site has been identified as part of the National Liberation and Resistance Project of Government. These are aspects that cannot be ignored and must be taken into account when framing heritage related informants for the site.
- The living heritage relating to the D'Almeida incident of 1510.
- The River Club and its history and relationship with the development of Afrikaner nationalism.
- Organisations present raised concerns regarding the cultural and natural landscape and broader metropolitan significance of the site.
- The potential loss of open space qualities were of particular concern, as was the impression that fast tracking pockets of development was being promoted.
- Concern was raised in respect of the origin of certain of the heritage informants that have been tabled; one example is that it is wholly unclear as to how the height related informants for the River Club were derived. It is difficult not to draw conclusion that these are based on a pre-conceived development concept.
- A further presentation in respect of the wider planning and development framework for the TRUP site was offered to the Committee by NM Associates in order to inform the Committee of the current state of planning for the area.

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Street Address: Protea Assurance Building, Green Market Square, Cape Town, 8000 • **Postal Address:** Private Bag X9067, Cape Town, 8000
• **Tel:** +27 (0)21 483 5959 • **E-mail:** hwc.hwc@westerncape.gov.za

Straatadres: Protea Assuransie-gebou, Groentemarkplein, Kaapstad, 8000 • **Posadres:** Privaatsak X9067, Kaapstad, 8001
• **Tel:** +27 (0)21 483 5959 • **E-pos:** hwc.hwc@westerncape.gov.za

- On balance it is evident that based on the heritage resources identified in the baseline study and its supporting documentation, that the TRUP is of extremely high heritage significance. The Committee agrees that the overall site is of at least Grade II heritage significance, if not higher.

RECOMMENDATION

Based on the significance of the overall site the Committee recommends that the TRUP area is referred to the next meeting of the Inventories, Grading and Interpretation Committee for formal grading.

Given the strategic importance and high significance of the site, it is a strong recommendation of the Committee, that the Council of HWC gives consideration to the provisional protection of the TRUP area under S 29 of the NHRA, and in so doing, providing more effective legal controls than those provided for in S 38(8), and specifically to investigate the desirability and extent of the area to potentially be declared as a Provincial Heritage Site.

INTERIM COMMENT

The Committee cannot at this stage endorse the Baseline Study as meeting the requirements set out in the response to the NID, dated 25 August 2016.

The Committee resolved that a formal presentation of the wider planning issues as well as any conceptual design framework undertaken thus far is made to it by NM Associates at its next meeting.

HWC reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number.

Yours faithfully



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Mr. Mxolisi Dlamuka
Chief Executive Officer, Heritage Western Cape