

We appreciate your interest and participation in this process. If you have any issues, questions or concerns regarding this project specifically, please ensure to have your comments returned to us by **23 May 2022**.

**Michelle Lee**  
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**SHOULD YOU WISH TO PROVIDE COMMENT, PLEASE PROVIDE YOUR DETAILS BELOW. PLEASE ENSURE TO WRITE CLEARLY.**

NAME:

ORGANISATION:

POSTAL ADDRESS:

TELEPHONE NUMBER:

FAX NUMBER:

E-MAIL ADDRESS:

CELLPHONE NUMBER:

COMMENTS:

ROSEBANK + MOWBRAY PLANNING + ARCHITECTURE  
COMMITTEE (RAMPAC)  
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082 465 7765  
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PLEASE SEE LETTER ATTACHED (DATED 20.05)



20 May 2022

**CHAND ENVIRONMENTAL CONSULTANTS**

For Attention: Michelle Lee  
[info@chand.co.za](mailto:info@chand.co.za)

**80 LIESBEEK WAY, ERF 160695, CAPE TOWN: PROPOSED TEMPLE, ADMIN & UTILITY BUILDINGS FOR THE CHURCH OF THE JESUS CHRIST OF LATTER-DAY SAINTS**

The Rosebank and Mowbray Planning and Architecture Committee (RAMPAC) hereby comment on the documentation and HIA that has been submitted for the above mentioned project. We wish to participate in the process and be notified of further opportunities to provide comment.

Herewith our comments on what has been presented thus far:

Although this seems a fairly comprehensive assessment, the HIA is fundamentally flawed in that there is very little in the way of articulating, mapping or summarising the heritage constraints and opportunities or design indicators guiding any development within this historical precinct.

The proposed scheme is illustrated with only a single "site development plan" and building footprints on one page of the HIA. – so very difficult to comment on it except that:

- The siting and planning of buildings on the site seems pretty random, no real structure is discernible and is a highly inappropriate, over-scaled development proposal.
- The proposed development appears to have no contextual relationship with the adjacent Valkenberg Homestead complex (currently Protea Hotel): the admin and utility buildings impose on it both in terms of proximity and scale.
- The location/ siting, form, scale and height of a temple building needs to respond sensitively to the Valkenberg Hospital's c1895 central Administrative Building tower.
- The only structure on the site (a Victorian house – admittedly not in its original condition) appears to be demolished to make way for parking; quite unnecessarily, it could surely be reused which could enhance the proposed development.
- Note should be taken of the need for the archaeological and cultural landscape assessment of the site to be informed by both pre-colonial and colonial findings and significances.

It is thus recommended that the HIA team further assess the heritage constraints to development of this site, within the broader cultural landscape setting, including a comprehensive visual impact assessment. It is noted that there have been a number of detailed heritage studies and HIAs in this area, including Valkenberg Hospital HIAs by Baumann, Winter et al, that should be more extensively referenced and utilized.

Kind Regards,

A handwritten signature in black ink, appearing to read 'A. AMERMAN'.

On behalf of RAMPAC

(a sub-committee of the RMCA)



**OLKSBOUKUNDIGE VERENIGING VAN SUID – AFRIKA  
VERNACULAR ARCHITECTURE SOCIETY OF SOUTH AFRICA**

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## Chand Environmental Consultants

PO Box 238 Plumstead 7801

23 May 2022

Attention: Michelle Lee

**RE:- Public Participation process in terms of the National Heritage Resources Act, Act 25 of 1999.  
Proposed Temple and associated buildings for the Church of the Jesus Christ of Latter-Day Saints.  
Erf 160695, Cape Town.**

Dear Madam

Vernacular Architecture Society of South Africa a voluntary society, in existence for some 60 years, wishes to be noted as a commenting organisation (I&AP) in respect of the above noted proposed development on Erf 160695, Cape Town.

We have studied the application and the Background Information Document as made available on the Chand Environmental Consultants Website. The following are some of our comments for your consideration.

- The document (HIA) is very comprehensive in its collation of background information relating to the site. This is particular true as regards the Valkenberg Hospital Site, but the Valkenberg Homestead to the south does not seem to been given same attention.
- We are in agreement with the assessment of the various structures on the site Erf 160695 as noted in the document.

However, the above not withstanding, we wish to note our deep concerns in respect of the following:-

- There is mention in the text of the document of various heritage indicators impacting upon the site. No where in the document have these been spatialized so that it difficult to access any proposal with any degree of clarity. There are a number of extremely significant views onto the site, as well the relationship with both the Hospital and Homestead, which need to be considered and mapped.
- The only figure in the document which indicates the proposal is Figure 60. This does not show the proposal in it broader surrounding context. The scale and positioning of the buildings is of concern to us, and we are unable to determine the rational behind of the postioning of the structures on the site, which appears to be fairly arbitrary. Of particular

concern is the location of the structure in the south –west corner of the site whose relationship to the Valkenberg Homestead, is to say the least, ill-considered.

- The scale and height of any spire or vertical element to the temple needs to very carefully considered so as not to be in competition with the tower of the Hospital. The only indication given of the height of any the spire is Figure 59. This shows the height of spire as being well above that of the Hospital tower.

## Conclusion

We would like to suggest that for a site which is situated in such a sensitive area that a full visual impact assessment be undertaken, as well a far more through and comprehensive mapping of all the heritage indicators pertaining to the site be undertaken.

Trust that the above comments are of assistance.

Kind Regards

Anton Roux  
On behalf of the VASSA Committee

23rd May 2022



CIFA A REGION OF SAIA

Ms Michelle Lee  
 Chand Environmental Consultants  
 PO Box 238  
 Plumstead  
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Transmitted by email to. [info@chand.co.za](mailto:info@chand.co.za)

Dear Ms. Lee

**COMMENT IN TERMS OF THE NHRA, IN RESPONSE TO A PHASE 1 HIA:  
 DEVELOPMENT OF A TEMPLE AND OTHER BUILDINGS ON 80 LIESBEECK  
 AVENUE, ERF 160695, CAPE TOWN**

**Introduction**

The proposal on erf 160695 is for the construction of a Temple and other buildings for the Church of Jesus Christ of Latter-day Saints.

**Background**

The Cape Institute for Architecture (Cifa) acknowledges the fact that the site is rich in tangible and intangible history, as identified in the HIA. These significances include amongst others the river, view corridors, vegetation, various structures and buildings, including the highly significant Valkenberg homestead and historical Valkenberg Hospital. There are also intangible heritage significances related to the pre-colonial people's occupation of the area. Any development therefore will have to take all these heritage significances of the immediate context into consideration.

**Comment**

At a meeting held on 13 May 2022 at Cifa, the following comments were raised:

1. The heritage indicators refer to view corridors and visual impacts on the historical fabric and cultural landscape significances: it is critical that the major elements and view corridors of the broader context be accurately mapped. This was deemed to be lacking in the report which makes it impossible to assess any architectural responses. The report references the 2012 Valkenberg Hospital HIA by Baumann, Winter, Attwell & Abrahamse, but unfortunately does not utilize or build upon its comprehensive assessment and analysis of the entire precinct, which was endorsed by HWC. Particular reference could be made to the Heritage Indicators diagram.
2. The report states that the visual impacts should be assessed. Cifa agrees, acknowledging that a Visual Impact Assessment is of critical importance in the assessment and approval process.
3. The committee takes note of the development proposals for temple, church, and substantial administrative buildings, along with extensive paved parking in the report. However, it was not shown how the development fits within the broader context, nor how any design informants



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were addressed or incorporated into the design. The committee considered that the proposed temple would compete with the Valkenberg Hospital's landmark historical buildings and central tower. Without clear design indicators and a VIA there is no way to be sure.

4. The HIA, quite rightly, refers to the potential impact of the development on the historical Valkenberg hospital, yet not enough attention is given to the highly significant Homestead complex, or how the development should respect it. It was felt that the design proposal does not respond to the homestead adequately but encroaches onto it. It was noted that there are no good photos of the homestead in the report. It is also noted that Baumann & Winter developed preliminary design indicators for erf 160695 in about 2005, which should be referenced.
5. The design informants (chapter 4.4) are vague: in the phase 2 HIA they need to be more specific and provide guidance.

### Conclusion

In addition to the issues raised above, the following further studies/information should be considered for inclusion in the phase 2 HIA:

- a. Cultural Landscape study
- b. Visual Impact study
- c. An analysis of the broader site context through a series of detailed diagrams - view corridors, no-go areas, buffer zones, etc.
- d. Alternative design proposals shown within the site context

The Cape Institute for Architecture, as an interested and affected party, would like to be informed of any further developments in the heritage process for this project going forward.

Yours sincerely

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### Reinier Visser

*Convener of the Heritage Review Committee  
for and on behalf of the Cape Institute for Architecture*



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## Two Rivers Urban Park Association

### TRUP Association

Chair : [marcturok@gmail.com](mailto:marcturok@gmail.com)

**T R U Park** is a declared Urban Park, with historical facilities and public open green space, south of the confluence of **Liesbeek & Black** Rivers.

The **Two Rivers Urban Park Association** (TRUPA) is the representative organisation that was established in 2003 after an extensive five-year public participation process between the City of Cape Town, landowners, stakeholders and affected and interested parties RE the Two Rivers Urban Park.

23 May 2022

Att: Michelle Lee [info@chand.co.za](mailto:info@chand.co.za) , [quahnita@vidamemoria.co.za](mailto:quahnita@vidamemoria.co.za) and [dumbrell@gmail.com](mailto:dumbrell@gmail.com)

### *T R U P Association's Interim Comments and Objections RE Phase One HIA and Draft proposals for ERF 160695 Cape Town for New Church of JC of LDS at 80 Liesbeek Avenue, West Valkenberg Precinct, Two Rivers Urban Park, Observatory.*

1. TRUP Association's Role as an Association, representing I&AP Stakeholders is based on our Constitution that is in turn based on the 2003 Contextual Framework that set the Park in place

We are asserting our best care to limit inappropriate development, not to permit disregard of existing policy as per TRUPA Constitution. Various aspects of TRUP Policy indicate what is required to protect its environment. Heritage Design Indicators for TRUP should take into account that it is a significant Heritage Site, nominated for National Heritage Site Grading. SAHRA is currently processing the Heritage Nomination for TRUP as recommended by Heritage Western Cape.

The TRUP is also deeply challenged within a Review process of the Cape High Court where an interdict has paused construction on the River Club site in order for the authorisation processes to be reviewed by the court. The significance of the TRUP Heritage is unique for our nation and is relevant to indigenous people, stated to be a serious matter prescribed by International Law.

In this context we call for extra caution and sensitivity to take this complexity into account, hoping that it may soon be clearer how to be compliant. In the interim, serious consultation is required.

2. TRUPA is committed to continue to take all relevant policy into account. We recognise that the significant Heritage of the site extends back thousands of years prior to colonial intrusion, telling Our Story as a Nation. There is a unique aspect of its Heritage that has strong contextual meaning, particularly during the early colonial period. Much of this has been hidden until recent times when researched evidence has revealed new insight. One fact for example, links the d'Almeida attack in March 1510 to the large Khoena villages in TRUP described as still present in 1655. The site is also linked historically to the first land capture in 1657 and the First Frontier War. Clearly, that makes TRUP a very sensitive area, requiring serious consultation if we are to do justice and show due respect to the need for Healing of this colonial pain, in line policy that significant heritage requires.

3. At present TRUP Association appreciate the points made in the Heritage Report, however, we note concern that the precolonial and early colonial periods seem to lack depth of focus, considering its significance. In our view, Consultation should reflect more of the tangible and intangible qualities

of this site so this can actually manifest these truths in future. Besides the site reflecting its depth of heritage, it should in our view also meaningful be reflected throughout the whole TRUP precinct.

4. We call for sensitivity to eradicate inappropriate threats that could undermine the character of open space within the park, noted as a Cultural Landscape environment as stated in policy.

5. We suggest that greater clarity of guidelines be formulated so that new building not over dominate within the park landscape. Appropriate indicators should guide the vision to the greatest success, to balance conservation of open space park green space with addition of useful facilities that benefit users of the park in a sustainable way. These are issues that the TRUP Policy calls for and is also within the consulted Draft Manifesto for TRUP. The need for adequate consultation with indigenous groups now indicated by recent ruling of the High Court, is because of these sensitivities.

6. We suggest that the green space character of the Cultural Landscape be respected and enhanced, for example by limiting impact of new buildings by setting them back behind a wider buffer.

7. We suggest that any new building be carefully neutral so as not to be too intrusive or jarring on the park landscape, aiming for a timeless backdrop character rather than to be in conflict with it.

8. There also needs to be some careful guideline so that new buildings be measured in scale and also have simple character that blends in well, without attempting to be pseudo- Cape Dutch!

9. The probable success is more likely to be use of humble inobtrusive simplicity. The proposal should not be 'monumental' or to compete in dominance with existing historical buildings.

10. Some additional thoughts are that TRUP is essentially seen as aiming to become an open accessible, integrated Heritage Park 'Commons'. It is therefore contrary to the vision to split the landscape into fenced off private plots! It is more desirable to feel like an integrated landscape. Clearly practical constraints require security so what is expected, is to set it in subtle ways, well back from the road, screened with landscaping etc. There is also concern that hard surfaces be kept to a minimum! We suggest that while public transport has not yet replaced the private motorcar, we should still note that the policy for TRUP expects much more sensitivity to minimise the extent of hard surface parking areas sufficient for average daily use. Policy favours 'park and walk' options where possible attempting to use perimeter parking for larger occasional use. The existing access avenue, may also possibly enable some overlapping of parking opportunities in sensitive ways.

All the above comments are essentially calling for the Phase One HIA to be more assertive and limiting negative impact to suit the context. TRUP is a unique Cultural Landscape. TRUP's pending National Heritage Status will insist on intense ongoing meaningful consultation, to meet the challenge to respect Place and protect the significant heritage. Clearly it is a work in progress that needs valid broad Co-Design participation and Heritage Authorities need to guide this with Care.

Yours sincerely,

**Marc Turok (0823773837)**

(For Two Rivers Urban Park Association and Stakeholders)

Copy to HWC : waseefa.dhansay@westerncape.gov.za