# Heritage Impact Assessment

# Portion of Remainder of Erf 61, Simons Town (Glencairn)

# **DRAFT FOR COMMENT**

submitted in terms of section 38(8) of the National Heritage Resources Act, 1999 (Act 25 of 1999)

# Submitted by:



May 2012

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#### **EXECUTIVE SUMMARY**

This Heritage Impact Assessment (HIA) of the proposed development of a portion of the Remainder of Erf 61, Simons Town, situated in Glencairn, is submitted in terms of *Section 38(8)* of the National Heritage Resources Act (Act 25 of 1999) (NHRA) as it is undertaken as part of a Basic Assessment process being carried out in terms of the National Environmental Management Act, 1998 (Act 107 of 1998), as amended, and the Environmental Impact Assessment Regulations, 2010.

In response to the NID, HWC requested an HIA that consists of a visual impact study, an archaeological study, with design indicators and an integrated set of recommendations.

Remainder of Erf 61, Simons Town, currently housing the Rotary Club's camp facilities, is located along Glen Road, to the north-west of Gordon's Camp and opposite the Glencairn Residential Area. The road reserve of the Glencairn Expressway and beyond that the Table Mountain National Park form the northern boundary of the erf.

The 4.2 ha portion of the erf that is intended for development is located to the south west of the Remainder of Erf 61, and currently houses a campsite, with prefabricated buildings. The Else River runs to the north of this site. The site also contains a number of stone pines and Eucalyptus trees.

The site originally formed part of the farm Else Bay, which seems to have been granted around 1800 or later. This farm was later owned by the Glencairn Estates, the company who first developed residential properties in the valley in the early 1900s. In 1929 the land was bought by WG Haines with a view to establish a holiday camp for underprivileged children, and was left to the Rotary Club upon his death, in 1942. The Rotary Club of Cape Town now wishes to establish a retirement village on a portion of the Remainder of Erf 61, to cater for the need in the South Peninsula on a not for profit basis.

The assessment found that the site has limited intrinsic heritage resources: There are no archaeological<sup>1</sup>, architectural or scientific heritage resources on the site, and entire property has some historical and social heritage value, related to legacy of Mr Haines who specifically earmarked the site for use by under-privileged children. As only a portion of the site will be developed and the remainder of the site will be used as intended by Mr Haines, these impacts are regarded as negligible.

The site has some contextual and aesthetic value due to its location in the Else River valley, although the site and its surrounds cannot be regarded as a highly significant cultural landscape. The site is visible from the Glencairn Expressway, a designated scenic route. The site also contains a number of stone pines and Eucalyptus trees which softens the otherwise rather stark landscape of the valley slopes. Thus visual impacts and the loss of the trees have been identified as impacts on heritage resources.

The proposed development entails a retirement village of 90 units and a community centre. The development is set back from the Else River and western boundary of the site so as to create buffers that will act as ecological corridors. The two alternatives presented for

<sup>&</sup>lt;sup>1</sup> Archaeological study by Orton, 2011

assessment differ in terms of the size of units and the access to the site. The preferred option has larger units, which are regarded as more viable, resulting in a larger portion of site begin used for the development (4.2ha as opposed to 3.8ha for the option 2). The site is not regarded as so sensitive so as to support the no-go option (option 1).

The VIA rated the overall visual impact of the preferred alternative as medium and mediumlow with mitigation measures based on inter alia the following:

- The development is to take place on a portion of land that has already been altered by human intervention.
- The proposed development is adjacent to existing urban development and so will be seen in that context.
- The development is low in the valley and will not affect the views of any ridgelines or
  of the coastline.
- From most viewpoints the overall percentage of the panorama in the valley that will be altered is relatively small.
- The visual character of the valley, while being altered in a way that some would see as negative, will not be significantly changed (Van der Stok, 2012).

There are only marginal differences in the impacts of options 2 and 3 according to the VIA and the VIA recommends that the preferred alternative 3 may go ahead, provided that a number of mitigation measures related to layout, architecture, colours and finishes, landscaping, fencing, lighting, signage and construction phase of the development, are implemented.

The preferred development will lead to the loss of a number of stone pines and Eucalyptus trees on the site (with 13 being retained). This impact is regarded as of medium-low significance and low with mitigation measures, which entails the replacement of the trees with suitable indigenous specimens as indicated in the landscaping plan.

Thus it is recommended that this report be endorsed as fulfilling the requirements of Section 38 of the NHRA and that the preferred development option be supported, provided that the mitigation measures as set out in the VIA are implemented fully.

### Statement of Independence

Lize Malan hereby declares that I have no conflicts of interest related to the work of this report. Specifically, I declare that I have no personal financial interests in the property and/or development being assessed in this report, and that I have no personal or financial connections to the relevant property owners, developers, planners, financiers or consultants of the development.

I declare that the opinions expressed in this report are my own and a true reflection of my professional expertise.

### **Experience and expertise**

Lize Malan holds a Master's Degree in Town and Regional Planning and have completed Diploma Courses in Architectural and Urban Conservation: Theory and Practice and Architectural and Urban Conservation: Skills Development at UCT. The author is a registered town planner with 15 years' worth of experience as a consultant planner, and has been practising as a heritage practitioner for the past 4 years. The author is an accredited member of the Western Cape Association of Professional Heritage Practitioners.

The author has undertaken heritage impact assessments for:

- The proposed development of Erf 5144, Kommetjie (Extension of Ocean View)
- The proposed Swartland Mall, Malmesbury (Portion of the Remainder of Farm 696, Malmesbury, erf 9125, Malmesbury, erf 2654, Malmesbury and a portion of 327, Malmesbury)
- Additions and alterations to Huis Visser and Huis Marais Residences, University of Stellenbosch (Erf 2143 and a portion of Erf 4906, Stellenbosch), University of Stellenbosch (undertaken with Elzet Albertyn)
- New buildings and additions to existing Irene Residence at the Wimbledon precinct (Portion of Erf 4906, Stellenbosch), University of Stellenbosch (undertaken with Elzet Albertyn)

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#### 1. Introduction

This heritage impact assessment (HIA) for the proposed development of a portion of Erf 61, Glencairn, the Rotary campsite is submitted in terms of *Section 38(8)* of the National Heritage Resources Act (Act 25 of 1999) (NHRA) as it is undertaken as part of a Basic Assessment process being carried out in terms of the National Environmental Management Act, 1998 (Act 107 of 1998), as amended, and the Environmental Impact Assessment Regulations, 2010.

Please note that this application should not be confused with an earlier application, submitted by the owners of Gordon's Camp for the development of a portion of the adjacent Gordon's Camp situated on the slopes above the Glencairn Expressway.

This heritage impact assessment follows on the submission of a Notification of Intent to Develop to Heritage Western Cape. In response to the NID, HWC requested a heritage impact assessment that consists of a visual impact study, an archaeological study, with design indicators and an integrated set of recommendations. It is noted that the Comment from HWC in the response to the NID states that the Glencairn Expressway and Table Mountain National Park (TMNP) will form the southern and northern boundaries of the developed property. This is not entirely accurate as will be indicated in this report. (A copy of the response from HWC is attached in Annexure A).

#### 2. The site and its context

The site is located to the north of Glen Road, the main road of Glencairn, between Gordon's Holiday Camp to the east and the Naval sports facilities of Da Gama Park to its west on a portion of the Remainder of Erf 61, Simons Town. The site is bordered to the north by the Glencairn Expressway, and beyond that the Table Mountain National Park. On the opposite side of Glen Road is the suburb of Glencairn and an open space immediately to the west of the residential area (Please refer to Figure 1). A triangular portion of this open space forms part of the TMNP.

Remainder of Erf 61 measures 237.2 ha in total and consists of two portions. A large portion of approximately 200 ha to the north of the Glencairn Expressway is contracted to the Table Mountain National Park (at no cost). The remainder of the property below the Glencairn Expressway measures approximately 41 ha. This portion of land is divided along its length by the Else River running down the valley. The bulk of this portion of the property to the north of Else River is not utilised, with the remaining approximately 8ha of land to the south of the Else River, located adjacent to Glen Road, housing the Rotary Youth Camp facilities.

These facilities include club-houses, hostels, ablutions facilities, chalets, sports fields and a swimming pool. The Smuts Hostel date to 1948 and the Happy Haven Hostel dates to 1954.

The portion of the erf on which the development is proposed measures approximately 4.2ha and is situated in the south western corner of the Remainder of Erf 61. It includes the Allan Jeffes camp as well as an undeveloped portion to its west. The facilities at the Allan Jeffes camp date to the 1980s. The camp has 30 beds, consists of 3 chalets built in 1988/89 and one hall built in 1989/90. The new access road to this facility was constructed in 1985/86. All the buildings are pre-fabricated i.e. framed with clapboarded walls and sheet roofing (personal communication, Dave Stuart, Cape Town Rotary Club).

There are a number of mature trees (mostly stone pines and bluegums) in the area where the camp facilities are located, presumably planted to provide shade for outdoor activities. The undeveloped portion of land to the west of the Alan Jeffes camp is heavily invested with wattles and Kikuyu, and there are also a number of stone pines, on this site including ones that have fallen over.



FIGURE 1: Extract from 1:50 000 map series indicating the location of the site



FIGURE 2: Google Earth Image – the solid line indicates the portion of the Remainder of Erf 61 on which the proposed development will be located. The boundary of the Remainder of Erf 61 is indicated in the dashed line. The yellow shading indicates portions of the Table Mountain National Park - the large northern portion, which forms part of the Remainder of Erf 61 is contracted to the Park at no cost.



FIGURE 3: Portion of the site proposed to be developed

The photographs below illustrate the site and its context:



Prefabricated buildings of the Allan Jeffes Camp on the site



**Allan Jeffes Clubhouse** 



Camp Facilities – view from western boundary looking south-east



Smuts Hostel to the east of the site (i.e. not affected by the proposed development)



Play area to the east of the Allan Jeffes camp facilities, with Glen Road behind



Play area looking east across the site



Play area looking east, with Else River to the left and line of eucalyptus trees beyond the river



Looking onto Glen Road from the play area – note mix of stone pines and eucalyptus trees



Undeveloped western portion of site, looking west from Allan Jeffes camp fence



Undeveloped western portion of site, looking north east from boundary with Naval sportsfield



Terraced entrance road to site



Entrance road with pines and gums behind (looking to the south-west)



Entrance to the site



Development on opposite side of Glen Road – Glencairn



Development on the opposite side of Glen Road – Wood Way intersection



Naval sports facilities viewed from Glencairn Expressway



Naval sports facilities viewed from Glen Road



Open space and development on opposite side of Glen Road – looking west to Welcome Glen



View onto space between Glencairn and Welcome Glen looking east

# 3. Methodology

The methodology followed to prepare this report entailed the following:

- Site visits in order to identify heritage resources on the site and related to the site, including its context and visual sensitivity.
- A revision of the all relevant studies (such as those listed in section 3.1 below)
   that may contribute to an understanding of the heritage resources on the site.
- A review of the relevant legislation that informs this study.
- Research at the library, the Surveyor General and the Deeds Office to gain an understanding of the history of the site.

#### 3.1 Inputs

As noted above this assessment forms part of Environmental Impact Assessment. Other specialist studies of relevance forming part of the Basic Assessment include:

 Botanical Impact Assessment of portion of Erf 61 Simon's Town (Glencairn), City of Cape Town, Western Cape (dated November 2011, May 2012) prepared by Dr David J McDonald

This report found that the undeveloped portion of the site on which the development is proposed has been so heavily impacted both physically and by the invasion of alien invasive wattles with the result that is regarded as impractical to restore its to its natural state. The report also states that the Alan Jeffes camp has very little botanical value and thus it concludes that there are no botanical reasons that the development should not proceed. In addition it is proposed that the portion of the Remainder of Erf 61, Simons Town, on the northern side of the Else River should be integrated into the "conservation estate" on the Cape Peninsula (McDonald, 2012).

The study also proposes as a mitigation measure to 'plant indigenous' and 'waterwise' and not to use invasive species such as kikuyu grass (P. clandestinum) for grassed verges etc (MacDonald, 2012).

The complete report is attached in Annexure B.

Archaeological Study for a Proposed Retirement Village on Erf 61, Glencairn,
 Simons Town Magisterial District, Western Cape (July 2011) prepared by Jason Orton, Archaeology Contracts Office

The study found no archaeological resources on the site and states that although the ground visibility was very poor, it is considered unlikely that any will be present on the site. It concludes that there are no objections to the proposed development from an archaeological point of view (Orton, 2011).

The complete report is attached in Annexure C.

 Visual impact assessment: Proposed Retirement Village on a portion of Remainder Erf 61, Simons Town, 2<sup>nd</sup> Draft (April, 2012) prepared by Albert van der Stok The VIA concluded that the significance of visual impact of the preferred development option is rated as medium without mitigation and medium low with mitigation. This finding is inter alia based on the following observations:

- The development is to take place on a portion of land that has already been altered by human intervention.
- The proposed development is adjacent to existing urban development and so will be seen in that context.
- The development is low in the valley and will not affect the views of any ridgelines or
  of the coastline.
- From most viewpoints the overall percentage of the panorama in the valley that will be altered is relatively small.
- The visual character of the valley, while being altered in a way that some would see as negative, will not be significantly changed. (Van der Stok, 2012)

The findings of the VIA is discussed in more detail later in this report. The complete report is attached in Annexure D.

 Composite application for the amendment of the Peninsula Urban Structure Plan, Simons Town Structure Plan, Peninsula Urban Edge and Rezoning, Subdivision and Departure Cape by Planning Partners (September 2011)

This report motivates for the various approvals required for the proposed development in terms of the Land Use Planning Ordinance (Ordinance 15 of 1985). As such the report includes relevant information on the details of the application, including references to the anticipated socio-economic benefits of the development. Where relevant information from this report have been included in the HIA.

Based on the site visits, research into history of the site and the findings of the relevant studies, heritage resources where identified, as well as set of design informants, which forms the basis of the impact assessment.

# 4. Legal Context

4.1 National Heritage Resources Act, Act 25 of 1999

Although this study forms part of an EIA process undertaken in terms of the National Environmental Management Act, the requirements of the National Heritage Resources Act (Act 25 of 1999) has to be met.

Section 38(1)(c)(i) of the NHRA requires the submission of a notification of intent to develop (NID) when the proposed development will change the character of a site exceeding 5 000 m<sup>2</sup> in extent and section 38(1)(d) requires a NID for a development that entails the rezoning of a site exceeding 10 000m<sup>2</sup>. In terms of section 38(8) however, the provisions of section 38 do not apply to a development as described in subsection (1) if an evaluation of the impact of such development on heritage resources is required in terms of the relevant environmental legislation: "Provided that the consenting authority must ensure that the evaluation fulfils the requirements of the relevant heritage resources authority in terms of subsection (3), and any

comments and recommendations of the relevant heritage resources authority with regard to such development have been taken into account prior to the granting of the consent."

This report follows on the submission of a NID in relation to the site and the assessment is intended to ensure that the requirements of HWC in terms of section 38(3) of the NHRA are fulfilled.

No other sections of the NHRA are applicable as there are no buildings or structures on the site that will be affected by the proposed development in terms of section 34, the site does not fall within a registered conservation area in terms of section 31, nor has it been awarded any protection in terms of section 27 of the NHRA. The archaeological assessment has also indicated that it is unlikely that any archaeological material would be found on the site triggering section 35(4).

# 4.2 The National Environmental Management Act (Act 107 of 1998) (NEMA)

The National Environmental Management Act (Act No. 107 of 1998), as amended, (NEMA) makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the relevant authorities based on the findings of an environmental assessment. NEMA is a national act, which is enforced by the Department of Environmental Affairs (DEA). These powers are delegated in the Western Cape to the Department of Environmental Affairs and Development Planning (DEA&DP) (Doug Jeffrey Environmental Consultants, 2011). DEA&DP will consider the comments of HWC in response to the HIA prior to issuing a Record of Decision regarding the proposed activities. Such an ROD, authorising an activity(ies) may include conditions related to the mitigation of negative impacts, including impacts on heritage resources. Only once the ROD has been issued, may an application in terms of land use planning legislation be considered.

According to the list of activities identified under sections 24 of NEMA in Listing Notice 1 (GN. R. 544), Listing Notice 2 (GN. R. 545), and Listing Notice 3 (GN. R. 546), published in Gazette No. 33306 on the 18 June 2010, effective from the 2 August 2010, the proposed activities that most likely triggers the need for environmental authorisation are related to the construction of roads, infrastructure required for services, construction within 32m from a river and transformation of undeveloped land to residential.

#### 4.3 The Land Use Planning Ordinance (Ordinance 15 of 1985)

The proposed development will require an approval for the rezoning of the site from "undetermined" to "group housing" and subdivision of the site from the Remainder of Erf 61, Simons Town in terms of the Land Use Planning Ordinance, 1985 (Ordinance 15 of 1985) (LUPO). In addition a departure from the zoning scheme regulations regarding the maximum height of buildings in this zone is required. The maximum height is specified at 8 m above mean ground level, whereas some units have a proposed height of 8,5 m above mean ground level.

In order for the rezoning to be approved, compliance with the Cape Town Spatial Development Framework, which has recently been approved as a Structure Plan in terms of section 4(6) of LUPO will be a legal requirement. Note that the Cape Metropolitan Area Urban

Area Guide Plan Volume 1: Peninsula, commonly known as the Guide Plan, has been withdrawn with the approval of the Cape Town SDF.

# 5. Policy Context

This section provides an overview of the relevant planning policies that apply to the site:

#### 5.1 The Simon's Town Structure Plan (1998)

The Simon's Town Structure Plan, approved in terms of section 4(6) of the Land Use Planning Ordinance (Ordinance 15 of 1985), designates the eastern part of the site as private open space (the western portion is not addressed as it presumably fell outside the structure plan area) and would thus have to be amended to permit the proposed development (Planning Partners, 2011).

# 5.2 The Peninsula Urban Edge Study (2001)

According to this approved policy, the site falls outside the urban edge. Considerations in this area included the importance of the Else River catchment area, steeps slopes and visual prominence of existing development. The report states that "lateral urban extensions are not recommended as it will have a detrimental impact on the natural environment".

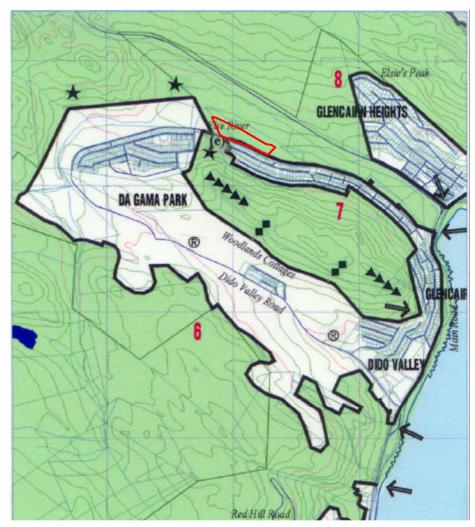


FIGURE 4: Extract from Peninsula Urban Study Report – Glencairn urban edge (The heavy black line indicates the urban edge.).

### 5.3 The Southern District Spatial Plan (2011) (Draft)

The diagram below presents an extract from the draft spatial plan for sub-district 4 – the Deep South, published in February 2011. This plan provides more detail to the City of Cape Town Spatial Development Framework. According to this plan, the site falls in a "Buffer 2" zone, where urban development is regarded as inappropriate (Please refer to Figure 5). Cultural resources have also been mapped as an input into the SDP and the site is indicated as part of a "structuring open space", which seems to be the designation for all land outside the urban edge. The black dot indicated to the north of the site refers to an "identified NHRA heritage site". It is understood that this is meant to indicate the remains of the Glencairn Mill , which is in fact located on the Naval property to the west of Remainder of Erf 61. The Glencairn Expressway is designated as a scenic route. Please refer to Figure 6.

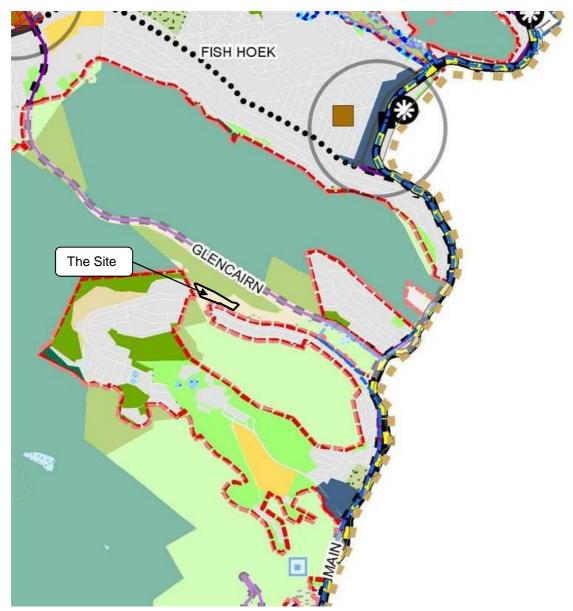


FIGURE 5: Extract from draft spatial plan for Sub-district 4, Southern District



FIGURE 6: Extract from Cultural and Recreational Resources Map, Southern District Spatial Plan

# 6. Historical Background

Remainder of Erf 61, Simons Town is a subdivision of the Farm Elsje Bay. The early history of this property is not clear. According to Tredgold (1985), the 1810 *Opgaaf rolle* indicates the property as belonging to Jan Frederick Salinger, who ran a tannery on the property called Eljse's Baai (presumably named after the quantity of Els trees found in the valley at the time). However, according to deeds office records, the property was originally held by Nicolas van Blerk through grants which date to 1822 and 1833 (the title deeds could however not be found at the Deeds Office).

In 1875 the property was acquired by Mr John Brown, a retired soldier, who, according to Tredgold, wished to "get away from the hustle and bustle of Cape Town". Whilst living at Elsje's Bay he became a road builder, in charge of many projects in the area (Tredgold, 1985).

Towards the end of the 1800s, especially when the railway line from Cape Town reached Simon's Town in 1890, False Bay became a popular destination for recreation purposes (Worden, 1998). In 1901 a syndicate formed by Donald McKay, Robert Williams, Robert Scott Whyte, John Forrest, John Cran and Andrew Burnett Reid bought the farm for 5 000 pounds, presumably with the view to establish a seaside resort. As they were Scottish of origin, the farm was named Glencairn, because of the great pile of stones, a *cairn*, found at the upper end of the valley, the *glen*. Later that year this syndicate formed a company called Glencairn Estates Ltd and in November of 1901, 56 erven was advertised for sale on the southern side of the valley (i.e. the opposite side of Glen Road) close to the sea (Tredgold, 1985).

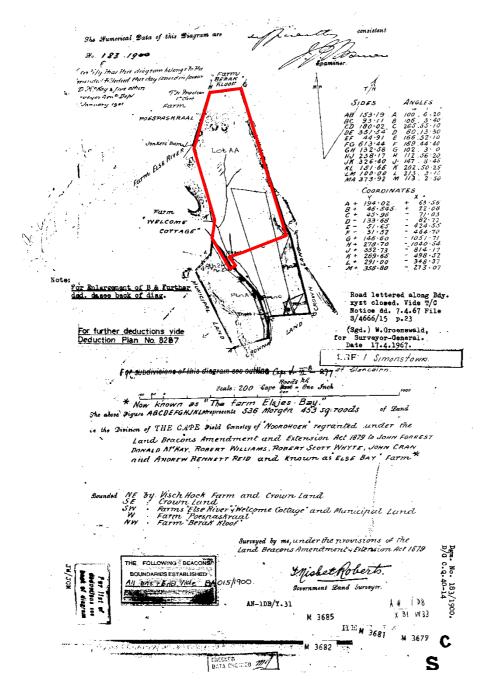


FIGURE 7: Diagram of the Farm Elsjes Bay, also known as Erf 1, Simonstown at Glencairn, surveyed in 1900, with Remainder of Erf 61 indicated.

In 1929, Lot AA and a part of Lot C (land that belonged to the Cape Glass Company from 1902 to 1908), then known as Erf 9, Simonstown at Glencairn, was sold to WG Haines by the Glencairn Estates Ltd. Mr Haines was a schoolmaster of SACS and founder of the Gordon's Institute (dedicated to physical training and education of poorer children) and he bought the property with a view to hosting holiday camps for children from poorer communities.

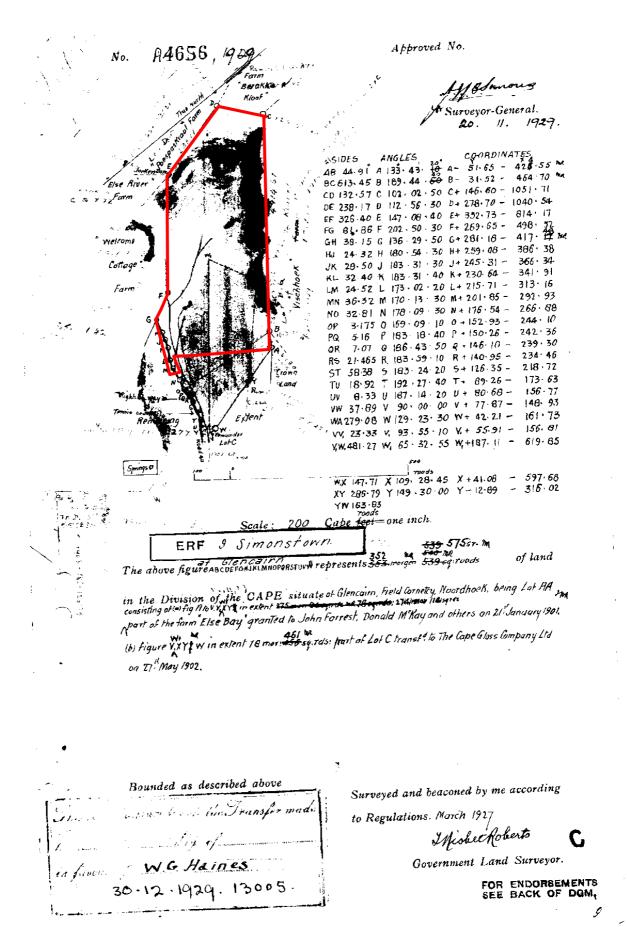


FIGURE 8: Diagram Erf 9, Simonstown at Glencairn with remainder of Erf 61 indicated

When he died in 1942 he left portion 11 of the farm Elsjes Bay (now known as Erf 61, Simonstown at Glencairn) to the Rotary Club of South Africa with the condition that the land should be used for holiday camps for children whose parents cannot afford a seaside holiday (Tredgold, 1985 and <a href="www.gordonsct.co.za">www.gordonsct.co.za</a>) and the camp facilities were established on the land.

In the late 1900s a large portion of the land to the north of the Glencairn Expressway, owned by the Rotary Club was contracted to the Table Mountain National Park.

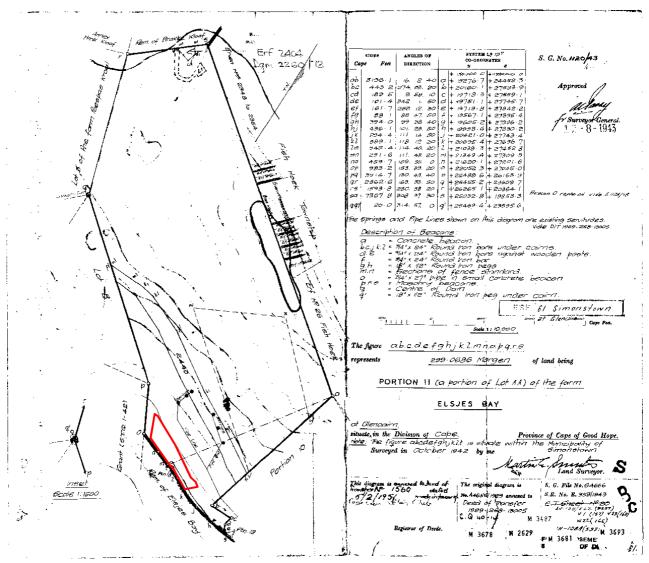


FIGURE 9: Diagram of Portion 11 of the Farm Elsjes Bay, now Remainder of Erf 61, Simonstown at Glencairn – with proposed development area indicated

## 7. Assumptions and Limitations

# 7.1 Availability of Information

The findings and conclusions of this study are based on the information currently available, and are thus limited by the amount of definitive information available at the time of the assessment.

# 7.2 Statement of Significance

The significance of cultural resource is dynamic and multifaceted, in particular as interest groups and societal values change over time. It is thus not possible to provide a definitive statement of heritage significance. In the context of this site, it is regarded as particularly complex as the site is regarded to have limited intrinsic value and contextual value. It is also noted that the perception of visual impact is a highly subjective issue.

#### 8. Heritage resources and significance

According to section 2(vi) of the NHRA cultural significance is defined as "aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance". The national estate includes, inter alia, places, buildings, and structures of cultural significance; historical settlements and townscapes; and landscapes and natural features of cultural significance (NHRA).

Section 3(3) of the NHRA identifies criteria for assessing the significance of a place. These include:

- a) Historical value
- b) Social value
- c) Architectural value
- d) Aesthetic and contextual value
- e) Scientific value

The heritage resources on or related to the site and their significance have been identified as follows:

# 8.1 Historical Value

From the research into history of the site, it is concluded that the Remainder of Erf 61, Simon's Town has some historical value, especially related to the legacy of Mr Haines, but this is not regarded as so significant so as to preclude development of a portion of the site. Furthermore, an archaeological impact assessment found no archaeological resources on the site and notes that although the ground visibility was very poor, it is considered unlikely that any will be present on the site (Orton, 2011).

#### 8.2 Social Value

It could be argued that the whole of the Rotary Camp site has some social value in that has provided underprivileged children with holiday opportunities since the 1940s. There is however, no evidence to suggest that the Alan Jeffes Camp, a fairly recent camp, where the development is proposed, in particular, has significant social value that would warrant protection or mitigation.

#### 8.3 Architectural Value

The portion of the site identified does not include any buildings of architectural value. The Smuts Hostel, which dates to 1948, and was opened by Genl. Smuts, most probably has heritage value. However the building is located adjacent to the portion of the site earmarked for development.

#### 8.4 Scientific Value

Scientific value may include rare fauna and/or flora. As noted earlier no rare or indigenous species will be affected by the development (McDonald, 2012).

#### 8.5 Aesthetic and Contextual Value

With regard to aesthetic and contextual value, it is noted that the site is located in a fairly isolated valley, and thus has a small and contained viewshed. The part of the valley in the vicinity of the site with its fairly recent suburban residential development, and military infrastructure, is not regarded as part of a highly significant cultural landscape. The site is never the less regarded as visually sensitive, because of its visibility from the Glencairn Expressway.

These comments are confirmed by the visual impact assessment which also expands on the visual environment of the Southern Peninsula. According to the VIA the landscape of the Southern Peninsula is characterized by islands of residential development tucked into the valleys and on the slopes of the mountains which are linked by routes which pass through natural areas of great beauty. This visual experience of alternating between built up areas and rugged natural areas while staying within the city limits is unique to Cape Town and a very important feature in determining the unique sense of place that is so highly prized in terms of tourism and by those who choose to live in these areas. At all times the natural visual elements predominate and the human settlements are experienced within, and as subservient to this natural arena (Van der Stok, 2012).

As illustrated by Figure 3, the site is located between two portions of the TMNP. To the south of Glen Road lies a small triangle land, which provides for a link between higher lying land and the valley – only a small portion of site shares a boundary with the Glen Road road reserve at the point where this portion of the TMNP meets the road reserve. To the north of site a large portion of the remainder of Erf 61 to the north of the Glencairn Expressway, is included in the TMNP. However this portion of the park is separated from the site by the road reserve of the Glencairn Expressway and the undeveloped land between this road and the Else River. Figure 10 below includes an extract of the map of the 25 heritage precincts, identified in the TMNP Heritage Resources Management Plan, compiled for the park in 2004 and contained in the 2006-2011 Conservation Development Framework for the TMNP. No heritage resources related to the site has been identified. Thus it is regarded that the relationship between the site and the TMNP is of very little significance from a heritage perspective.



FIGURE 10: Extract from TMNP CDF heritage precincts map – heritage precincts are indicated in yellow

Stone pines are often regarded as part of the cultural landscape of the Cape Peninsula, and thus are important heritage resources in some of these landscapes, especially where they are located on the middle slopes of the peninsula mountains (where large numbers were planted by the Dutch East India Company in the 1700s (SANParks, 2008). It seems unlikely that these stone pines were planted by the DEIC, as the initial limited settlement in the valley seems to date to the late 1700s or early 1800s. It is never the less noted that these trees are an aesthetic element in the valley, providing shade and greenery in what would otherwise be a harsh environment. Similarly eucalyptus trees, although alien invasive species are often regarded as part of the cultural landscape. According to Rourke (2008), certain species Eucalyptus trees were introduced to South Africa in the late 1800s as an alternative source of wood used for fuel and have become an integral part of the cultural landscape in parts of the Western Cape such as the Overberg. The age of the Eucalyptus trees on the site are unknown, but it is evident that the specimens on the site itself are not particularly attractive. However the grove of Eucalyptus trees on the northern bank of the Else River play a role in softening the visual impact of development on and beyond the site, to its south, especially as seen from the Glencairn Expressway.

#### 8.6 Conclusion

In summary then it is evident that the site has limited intrinsic heritage value and that as indicated in the response to NID issued by HWC, the only resource of some significance that would warrant closer attention, is the contextual role of the site in the cultural landscape that has some significance. In this regard the visual impact of the development from the Glencairn Expressway, a designated scenic route, is regarded as particularly important. Figure 11 illustrates the view of the site from the Glencairn Expressway. Note the trees that soften the views onto the valley, compared to the largely exposed residential development against the slope behind the site.



FIGURE 11: Approximate location of site viewed from Glencairn Expressway

Portion of Remainder Erf 61, Simons Town HIA

# 9. Heritage Indicators

Following on section 8 above, the heritage indicators have been identified as follows:

- Minimise the visual impact of the development, especially as seen from the Glencairn Expressway, through careful design of buildings, layout of the site and screening of the development.
- Retain aesthetically pleasing trees on the site where possible to soften the impact of development in the valley.

# 10. Development Proposal

#### 10.1 The preferred alternative (Alternative 3)

The development proposal entails a retirement village consisting of 90 dwelling units as well as a community centre. The community centre will be located in the middle of the village on axis with the main entrance. Access to the site will be gained from Glen Road opposite its intersection with Wood Road. Access to the retirement village will be controlled and the village will be fenced for security with a visually permeable fence that will also allow for the movement of small mammals and reptiles across the site.

The layout allows for the units to face to the north looking across the Else River. Most of the dwelling units will be semi-detached, with some single dwellings. The units overlooking the river will be single storey, whilst those at the back (closer to Glen Road) will be split level units set against the slope that will allow access from a higher level to the upper unit and the lower level for the ground floor unit. The double storey buildings (split-level units) will appear as single storey buildings from Glen Road. Units will have a garage and visitor parking. The units including the carport/garage are on average 114m<sup>2</sup> in size. Figure 12 illustrates the proposed layout.

The development will be set back from the Else River as well as the boundary between the site and the naval facilities to its north in order to create ecological corridors. The ecological corridor along the river will also function as an amenity with footpaths for the residents and users of the Rotary campsite. The ecological corridor to the north will provide a link between the mountains to the south of site (a portion of which falls within the TMNP) and the river. As part of the development, the land owners have also undertaken to manage the land to the north of the Else River as a nature area, for which an environmental management plan has been prepared.

The retirement village will be operated in terms of the Retired Persons Act, and no free hold will be granted, but only life rights to retired persons. The units will be held in a trust controlled by the Rotary Club of Cape Town.

#### Architecture

The architecture of the proposed development, designed by Architects Boers Associates, is described as follows:

The design of the village responds to the natural contours and slope of the land. Units are low in profile and nestle into the valley. The colour and texture of materials are chosen to blend in. A mixture of pitched and flat roofs provides an articulated form, and cottages are



FIGURE 12: Layout of preferred option (Alternative 3)

Portion of Remainder Erf 61, Simons Town HIA Page 25



FIGURE 13: Proposed landscaping plan



FIGURE 14: Alternative 2

positioned a non-rigid way to suit slopes and trees, so that there is informality about the layout.

Cottages have deep overhangs and terraces, either partially covered or under pergolas, which will allow residents to enjoy the outside, and which create shadows that provide visual interest and soften the visual impact of the dwellings. Materials are generally plastered brickwork, dark window frames and light roof sheeting, timber pergolas and brick paving to terraces. Wall colours are muted but varied to ensure interest.

Annexure E contains illustrations of these proposals.

#### Landscaping

The proposal includes a landscaping plan which allows for higher trees and shrubs to screen the development from the road. Inside the village there will be planting along roads and between houses and common spaces will be planted with shrubs and grass. As a result of the limitations of the layout, safety concerns, likely construction disturbances and quality of the trees, only a few individual specimens of stone pines have been retained as indicated on Figure 13. The site will be retreed with appropriate species chosen from the plant list attached. The remaining grove of Eucalyptus along the river has been kept to provide shade and shelter for the camp sites situated along the northern bank of the river. It is the intention to progressively remove these trees and replace them with indigenous trees to create a screen/thicket along the river which will screen the development from the Glencairn Expressway and the road from the development.

#### 10.2 Alternatives

In addition to the preferred alternative described above the following alternatives were put forward by the design team:

# Alternative 1: The No-go Option

The no-go option essentially refers to the exercising of the existing rights on the site, which will entail the continued operation of the Rotary camp facilities. In terms of the current zoning no further development can be allowed on the site.

#### Alternative 2

Alternative 2 is described as a preliminary layout that dates to 2008. This layout also provides for 90 units, but the units themselves are smaller (90m² on average, compared to 114m² in the preferred alternative), thus the total area taken-up by the development is smaller (3.8ha as opposed to 4.2ha). The units are accommodated in detached and semi-detached units with one and two bedrooms per unit. Access to the site would be gained from a new intersection with Glen Road to the south-west of the site. This alternative also makes provision for a sports field to the north of the Else River. Please refer to Figure 14.

#### 10.3 Discussion

Alternative 3, described as the preferred alternative in section 10.1 above, is the preferred option because the units are larger and regarded as more suitable for retirees. As result Alternative 3 results in a larger development footprint. It is noted that the diagrams illustrating alternatives 2 and 3, may seem to indicate a substantial difference in the density and footprint of the development, however the diagram illustrating the preferred the option also includes,

an additional 18 single garages (or roofed carports), patios, decks and courtyards (not shown on alternative 2) and more complex plan form resulting in a realistic footprint as well as wider roads (6.0m as opposed to 5.0m).

In addition the access arrangement, which creates an intersection opposite Wood Way is regarded as more appropriate because it provides for better sightlines and limited road crossings.

### 11. Assessment of Impacts

#### 11.1 Potential impacts and rating

Following on the discussion of the heritage resources on or related to the site the following impacts have been identified. The detailed assessment of these impacts is contained in Annexure G of this report, whilst an explanation of the assessment criteria is contained in Annexure F.

Potential loss of some historical value, related to the heritage of Mr Haines who
established the notion of holiday camps for under-privileged youths on the site in the first
half of the 1900s.

This impact is regarded as negligible as the site in fact only covers a small portion of the Remainder of Erf 61 and a large portion of the site, which includes the older campsites, such the Smuts Hostel will in fact remain in use as intended by Mr Haines.

 Potential loss of some social value as camp facilities used for the benefit of underprivileged children will be lost

Similarly this impact is regarded as negligible as these services will continue to be offered elsewhere on the site.

• Negative visual impact of the proposed development, especially as seen from the Glencairn Expressway.

Assessment of this impact is based on the findings of the visual impact assessment. The VIA investigated the visual impact of the development as it will be experienced from the Glencairn Expressway, Glen Road, the Glencairn, Welcome Glen and Glencairn Heights residential areas as well as from the ridgelines within in which the valley is contained. The study found that the receiving environment has sufficient visual absorption capacity (rated as *medium*) to accommodate the development and that the development will be compatible with the surrounding landscape as it will be experienced as an extension of the surrounding urban development.

With regard to the difference between alternatives 2 and 3, some of the impacts (from various view points) are rated differently only for the *intensity* of the impact, with alternative 2 rated as medium-low and alternative 3 rated as medium in some cases, because of the addition of the community centre and the larger unit size of alternative 3. With mitigation these ratings drop to low and medium-low respectively. These differences are not regarded as highly significant.

The study concluded that overall the significance of the visual impact of the development is rated as medium and medium-low with mitigation measures and recommended that the development of the preferred option can go ahead provided that the mitigation measures are implemented.

With regard to the estimated *perception* of the impact of the development the VIA states the following:

The usual reaction to the sight of a new development, especially by those who know an area well, is negative, and that is likely to be the initial reaction to the proposed development by many viewers, especially those who live in the area, however, over time most reactions are tempered. This development should be seen as visually neutral in the long-term as it will be experienced as a logical extension of the existing urban fabric.

The rehabilitation and long-term management of the nature area to the north of the Else River will be experienced as positive.

 Loss of existing trees such as stone pines and eucalyptus trees that soften the landscape

As is evident from the plan presented in Figure 15, a number of the mature trees on the site itself will be lost, with 13 stone pines being identified for preservation. In addition the Eucalyptus grove on the northern bank of the Else River will be removed over time and replaced by other species for ecological reasons. The loss of the mature trees on the site will have some impact on the cultural landscape as well as the visual impact of the development. Visual impacts have been dealt with in the VIA, and the impact on the cultural landscape is regarded as a medium-low impact, as the landscape itself is not regarded as a highly significant cultural landscape. The proposed replacement of the trees of suitable indigenous varieties is regarded as suitable mitigation measure that will overtime lower the rating of this impact to low and possibly neutral over the very long term.

#### 11.2 Alternatives

It is evident that the impacts noted above will be similar for both alternative 2 and 3, except for some aspect of the visual impacts, as set out above.

With regard to alternative 1, the no-go option, it is evident that impacts noted above will not occur in this scenario, except that the stone pines and Eucalyptus trees may in any event be lost due to old age, fires or a programme to reinstate indigenous vegetation on the site. It is also noted that VIA has rated the visual impact of the site as Low, due to the current usage and structures of the site.

# 11.3 Mitigation measures

The mitigation measures recommended in the VIA is listed below. These are regarded as sufficient to address the impacts identified in 11.1 above.

- Site Layout and Massing
  - The overall density of development in Alternative 3 must be seen as final and no increase in density must be allowed.

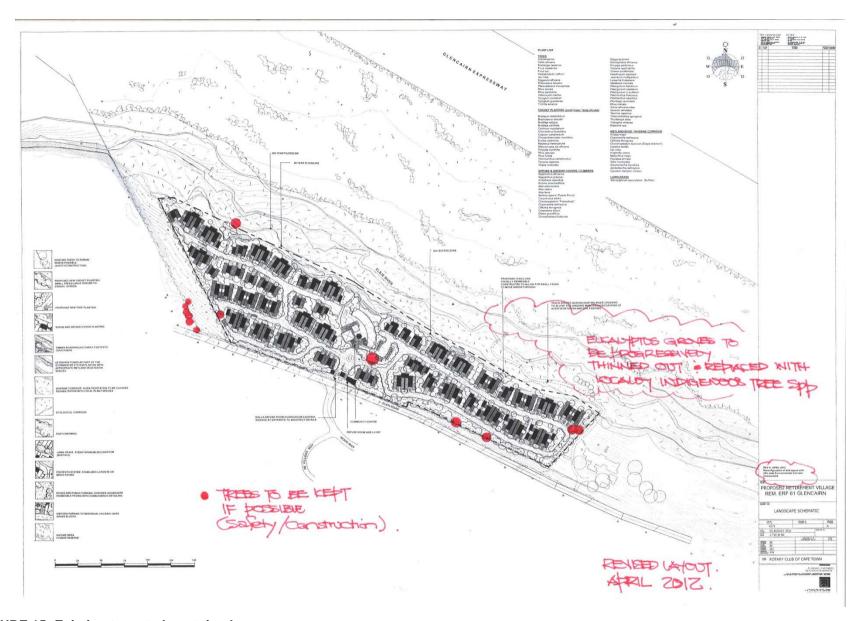


FIGURE 15: Existing trees to be retained

#### Architectural

- All structures are to be founded as low as possible on the chosen sites. No plinths
  are to be constructed to raise the buildings above natural ground level in order to
  secure views.
- Every attempt must be made in the architectural design to minimize the apparent bulk of the buildings. They are not to appear monolithic but rather created of smaller units that are visually stimulating and allow for the interplay of light and shade. This is especially true of the community centre.
- Roofs are to be broken up into smaller planes rather than using a single uniform roof structure. This is applies particularly to the roof of the community centre.
- Where there are large expanses of glass, they must be shielded by means of being set back into the façade, or by means of pergolas etc. so as to avoid glare from the sun affecting the surrounding houses and areas.
- Solar panels, if used, are to be installed against the roof rather than being elevated and oriented separately from the roof structure.
- Satellite dishes are to be placed as visually unobtrusively as possible.
- The entrance structure is to be understated and in keeping with the ambience of the area.

#### · Colours and finishes

- o In general colours and textures must be chosen for their ability to blend into the surrounding environment with light earth-tones being predominant.
- Care must be taken with the colour and finishes of the roofs so that unacceptable glare to the houses above Glen Road is avoided.

#### Landscaping

- Landscaping will be key in creating a visually acceptable environment and breaking up the apparent density of the development in a way that is more appropriate to the existing visual context.
- Planting is to be used to soften the impact of the built forms. This includes planted pergolas over patios and balcony areas, vines on walls etc.
- o The planting of indigenous trees and shrubs is to be encouraged.
- o A landscape masterplan for the site and an environmental management plan for the natural areas must form part of the final submission.
- Where the existing trees are to be removed, they are to be replaced, where appropriate, with suitable indigenous trees so as to maintain visual screening of the development.

## Lighting

- o It is essential that the experience of the night sky is not negatively affected. To this end all external lighting must be shielded in such a way that only the area that is meant to be lit is actually lit and light is not allowed to spill into the surrounding landscape or upwards into the sky.
- The aim is to have no naked light sources, i.e. the light bulbs themselves, visible from outside the site. Only reflected light should be visible away from the site. This is especially true of any security lighting that may be installed. (Translucent shielding is not acceptable as the light source will still be directly visible even though the intensity of the light will be somewhat reduced.)

Please see Addendum 4 for guidelines concerning the use of lighting.

#### Fencing

- All fencing for the site must be visually permeable, i.e. steel palisade or weld mesh, or vegetative in nature.
- o The fencing is to be coloured, grey or black. Green is not acceptable.
- Razor wire should not be used. Where security measures are necessary, visually unobtrusive solutions must be found.
- o Where possible, fencing should be screened by planting.

#### Signage

• The signage for the development must be understated and in line with the semi-rural nature of the area.

#### Construction Phase

- All construction activities are to be restricted to the development area which must be clearly marked out before any development begins.
- The river buffer zone is to be marked of and construction workers are to be restricted from access to this area as well as from the area to the north of the river. These areas are not to be plundered for fire wood, used for toilet facilities or as a hunting ground for the local wildlife.
- All building stockpiles are to be protected against dispersion by any means into the surrounding terrain. This is especially true of cement and diesel.
- All builders' rubble is to be removed from site timeously and dumped at a registered dump site. The surrounding fynbos areas are not to be used for dumping under any circumstances.
- All construction scars are to be rehabilitated immediately after construction is complete. This is especially true for all activities related to the supply of infrastructure, some of which may be outside the development area.
- Litter must be strictly controlled.
- Fires used by construction workers must be strictly controlled so that the accidental setting of fire to the existing vegetation is avoided (Van der Stok, 2012).

### 12. Socio-economic impacts

The Rotary Club of Cape Town, a not-for-profit organisation, identified the need for a retirement village in the South Peninsula as part their programme to serve the aged. The retirement village will be operated in terms of the Retired Persons Act, which would inter alia mean that only retired persons may be accommodated in the village. The ownership of the units will remain vested with a trust controlled by the Rotary Club and the units will be made available to retirees on a life rights basis. In addition to fulfilling this need in the community, the project will also create employment during the construction and operation phases.

#### 13. Conclusions & Recommendations

Based on the findings of the impact assessment, it is concluded that from a heritage perspective, the preferred option can go ahead, provided that the mitigation measures as set out in the VIA be implemented.

It is thus recommended that:

- HWC endorse this report as having met the requirements of Section 38 of the NHRA,
   and:
- That HWC support the preferred development proposal as presented in this report, provided that the mitigation measures as set out in the VIA (Van der Stok, 2011) and included in section 11.3 of this report are fully implemented.

### 14. References

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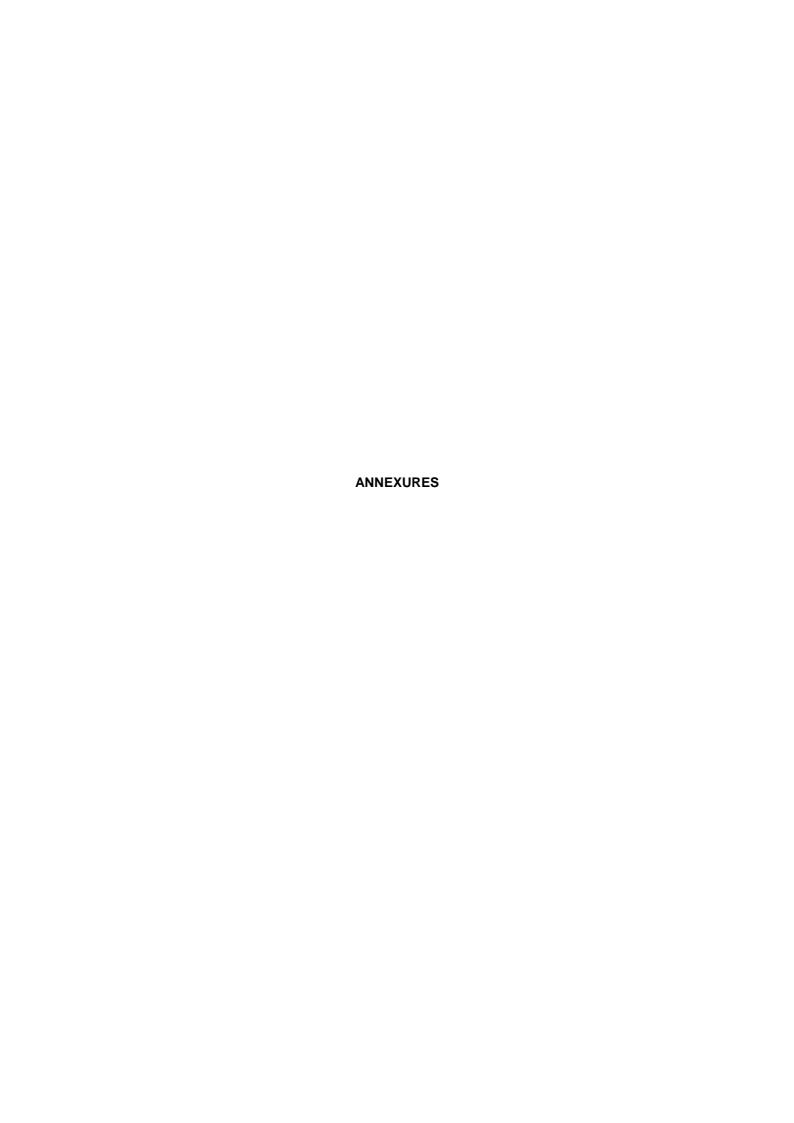
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# Our Ref: HM\CAPE TOWN METROPOLITAN\SIMONS TOWN\PORTION OF ERF 61 (GLENCAIRN)

Case No: 110727JL29 Case ID: 1479 Unique Letter ID: 1385

Enquiries: Jenna Lavin Tel: 021 483 9885

E-mail: <u>flavin@pgwc.gov.za</u>

2 August 2011 Ms Lize Malan 4 Rose Street Pearl 7640

#### RESPONSE TO NID

# TO DEVELOP PORTION OF ERF 61 IN SIMONS TOWN (GLENCAIRN), CURRENTLY HOME TO THE ROTARY CLUB YOUTH CAMP

Estants Was-Koop Heritage Wasters Cope

The above matter was discussed at the HWC staff meeting held on 29 July 2011, in terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999):

#### It was noted that:

- The application is for a change of character to a site exceeding 5000m²
- 2. The site currently is home to the Rotary Youth Camp
- The Glendairn Expressway and Table Mountain National Park will form the Southern and Northern boundaries of the developed property

Heritage Western Cape (HWC) agreed that:

TS Hall

 An HIA is required consisting of a visual impact study, an archaeological study and must include design indicators with an integrated set of recommendations.

Yours faithfully

Andrew Hall

Chief Executive Officer Herltage Western Cape Tel: 021 483 5959 abhall@pgwc.gov.za

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**ANNEXURE C: ARCHAEOLOGICAL STUDY** 



ANNEXURE E: ILLUSTRATIONS OF DEVELOPMENT PROPOSALS

Sketch of Two Semi-detached Units



Sketch of Split Level Double Units



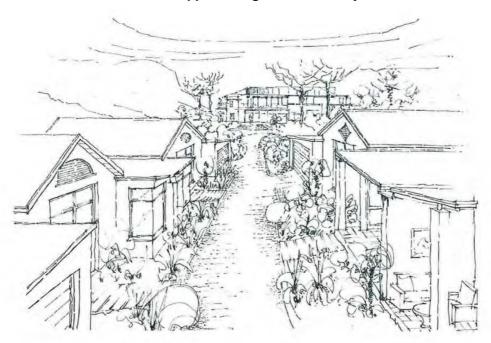
Street view of double storey units



**The Community Centre** 



Street View approaching the Community Centre





## **Assessment Criteria**

The following criteria have been used in the assessment of the proposed development alternatives:

#### **Description of the impact**

This refers to the nature of the impact on the resources on the site (physical impact), the nature of visual impacts, and impacts on environmental/scenic context.

#### **Extent of impact**

This refers to the geographical area of impact:

- Local refers to impacts to the site itself, and its immediate surrounds i.e. the Else River valley
- Sub-regional refers to a wider area 5 10 km beyond the site and would include Fish Hoek and Simons Town
- Regional refers to the Southern Peninsula context.

## **Duration of impacts**

Period used include:

- Permanent
- Long term more than 10 years
- Medium term 5 to 10 years
- Short term 1- 5 years
- Temporary e.g. during construction

## Rating of impacts

- Positive refers to an improvement/enhance of heritage resources and significance
- Neutral refers to negative impacts offset by positive of impacts, or impacts that are neither positive nor negative
- Negative refers to impacts that will negatively affect heritage resources and cultural significance

These ratings are in turn qualified by the ability to mitigate impacts:

- High negative refers to impacts that are difficult to mitigate or require substantial mitigation. Such measures should be monitored on a six monthly basis as part of an environmental management plan and may require additional mitigation measures until a satisfactory outcome is reached.
- Medium negative refers to impacts that are of some concern and for which mitigation measures should be measured on a yearly basis as part of an environmental management plan.
- Low negative impact refers to impacts that require no or minimal mitigation with a once evaluation of the effectiveness of the mitigation once completed.
- Positive refers to impacts that enhances the heritage resources and thus require no mitigation.

# Significance of impacts on heritage resources

The significance of the impacts on heritage resources is measured in relation to the cultural significance of the heritage resource, with cultural significance defined as "historical, architectural, aesthetic, scientific, social, spiritual, linguistic or technological value or significance" in the NHRA.

The significance of the impact is measured as either none, negligible, low, moderate or high.

#### Confidence in the assessment

This refers to the extent of certainty with which a specific impact has been identified as well as the certainty of the impact of mitigation measures on such an impact. The degree of certainty is to a significant extent dependent on the amount of information available at the time of assessment.

Confidence in the assessment is measured as follows:

• High: 75% or greater degree of certainty

• Medium: 50% to 75% degree of certainty

Low: 25% to 50% degree of certainty

Minimal: none to 25% degree of certainty.



# **Assessment of Preferred Alternative (Option 3)**

	Description of Impacts	Extent, Rating and	Significance	Informants and References	General Comments & Mitigation Recommendations	Confidence
1.	Potential loss of some historical value, related to the heritage of Mr Haines who established the notion of holiday camps for underprivileged youths on the site in the first half of the 1900s.	Local, sub-regional, regional Low negative Permanent	Negligible	Sections 6 and 8	The impact is regarded as negligible as the bulk of the site will continue to be used as intended by Mr Haines.	High
2.	Potential loss of some social value as camp facilities used for the benefit of underprivileged children will be lost	Local, sub-regional, regional Low negative Permanent	Negligible	Sections 6 and 8	The impact is regarded as negligible as two youth camps will remain on the site and will continue to provide social service to the community of Cape Town.	High
3.	Negative visual impact of the proposed development.	Local, Medium negative Permanent	Medium-low significance	Section 8, as well as the VIA prepared by Albert van der Stok	This assessment is based on the findings of the VIA (Van der Stok, 2011). The VIA concluded that the significance of visual impact of the preferred development option is rated as medium without mitigation and medium low with mitigation. This finding is inter alia based on the following observations:  o The development is to take place on a portion of land that has already been altered by human intervention.  o The proposed development is adjacent to existing urban development and so will be seen in that context.  o The development is low in the valley and will not affect the views of any ridgelines or of the coastline.  o From most viewpoints the overall percentage of the panorama in the valley that will be altered is relatively small.	High

					<ul> <li>The visual character of the valley, while being altered in a way that some would see as negative, will not be significantly changed.(Van der Stok, 2011)</li> <li>Mitigation measures:</li> <li>The proposed mitigation measures is set out in section 5</li> </ul>	
					of the VIA which is included as Annexure D to this report	
4.	Loss of existing stone pines and eucalyptus trees on the site	Local, Low negative Permanent	Medium-low significance  With migitation: Low significance to neutral in the long term	Section 6	The treed site is not regarded as part of a highly significant cultural landscape, it is never the less noted that the trees play an important role in soften the landscape in the Else River Valley  Mitigation measures:  Retreeing the site with appropriate indigenous site according to a landscaping plan, that will form part of the approval of the development.	High

# **Assessment of Option 2**

	Description of Impacts	Extent, Rating and	Significance	Informants and	General Comments & Mitigation Recommendations	Confidence
		Duration		References		
1.	Potential loss of some historical value, related to the heritage of Mr Haines who established the notion of holiday camps for underprivileged youths on the site in the first half of the 1900s.	Local, sub-regional, regional Low negative Permanent	Negligible	Sections 6 and 8	The impact is regarded as negligible as the bulk of the site will continue to be used as intended by Mr Haines.	High
2.	Potential loss of some social value as camp facilities used for the benefit of underprivileged children will be lost	Local, sub-regional, regional Low negative Permanent	Negligible	Sections 6 and 8	The impact is regarded as negligible as two youth camps will remain on the site and will continue to provide social service to the community of Cape Town.	High
3.	Negative visual impact of the proposed development.	Local, Medium negative Permanent	Medium-low significance	Section 8, as well as the VIA prepared by Albert van der Stok	This assessment is based on the findings of the VIA (Van der Stok, 2011). The VIA noted that in terms of <i>intensity</i> of visual impact of development Option 2, the experience from Glen Road and the Glencairn Expressway, the impact is rated as Medium, and as Medium-low from Glencairn above Glen Road. Mitigation reduces the ratings of the impacts as follows:  From Glen Road - from Medium to Medium-low From Glencairn Expressway – from Medium to Low From Glencairn above Glen Road – from Medium-low to Low  With regard to all other factors the visual impacts for options 2 and 3 are rated the same. In conclusion the overall significance of the visual impact of Option 2 is	High

					rated the same as for option 3, namely Medium and Medium-low with mitigation.  Mitigation measures: The proposed mitigation measures is set out in section 5 of the VIA which is included as Annexure D to this report	
4.	Loss of existing stone pines and eucalyptus trees on the site	Local, Low negative Permanent	Medium-low significance  With migitation: Low significance to neutral in the long term	Section 6	No information was provided on the number of trees that would potentially be retained should Option 2 go-ahead. It was assumed that this number would not be less than for Option 3. The treed site is not regarded as part of a highly significant cultural landscape, it is never the less noted that the trees play an important role in soften the landscape in the Else River Valley.  Mitigation measures: Retreeing the site with appropriate indigenous site according to a landscaping plan, that will form part of the approval of the development.	High

# Assessment of No-go Option

	Description of Impacts	Extent, Rating and	Significance	Informants and	General Comments & Mitigation Recommendations	Confidence
		Duration		References		
1.	Negative visual impact.	Local, Low negative Permanent	Negligible	Section 8, as well as the VIA prepared by Albert van der Stok	This assessment is based on the findings of the VIA (Van der Stok, 2011). The existing use of the site and structures of the site have some visual impact rated in the VIA as low.	High
2.	Loss of existing stone pines and eucalyptus trees on the site	Local, Low negative Permanent	Medium-low significance  With migitation: Low significance to neutral in the long term	Section 6	It is possible that trees on the site may be lost to fires, or natural causes (old age), or a programme to rehabilitate the vegetation on the site.  Mitigation measures: Retreeing the site with appropriate indigenous site.	High