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September 4, 2016

Ms. A Hill  
SRK Consulting (South Africa) Pty Ltd.  
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Email: [ahill@srk.co.za](mailto:ahill@srk.co.za)

Dear Ms. Amy Hill,

#### **Comment on the Draft Scoping Report for Redevelopment of the River Club**

The Friends of the Liesbeek wish to offer the following comment on the draft scoping report for the Redevelopment of the River Club by SRK Consulting (South Africa).

Over the last 25 years the collective interests of the Friends of the Liesbeek has resulted in an extensive contribution to the value and well-being of the Liesbeek River, in working with members, neighbourhoods and partnerships with private businesses and the City.

We understand the need for the existing business to optimise its land use and zoning, we are concerned that the redevelopment plans could lead to development that is incompatible with ecologically sensitive area adjacent to Liesbeek River, and have adverse impacts on the river and properties both upstream and downstream of the Liesbeek. The adjacent land is ecologically significant, contrary to the report from the Fresh Water Ecologist. The area supports resident and migratory fauna which relies on the blue and green corridors for habitat and undisturbed passage. In addition, the TRUP park functions as an urban recreation zone that provides amenity for residents from all over the City of Cape Town, and the Friends of the Liesbeek and public interest groups further up-stream have contributed considerably to ensure that access to public open space remains attractive.

The report raises the following concerns:

1. The River Club owners are proposing significant new developments as part of the proposal and that these developments will provide the site with additional rights into the future which may not be compatible with the adjacent environmentally sensitive lands.
2. The Freshwater Ecologist makes a number of spurious claims, for example, that the site is “a highly disturbed environment” and considered of extremely low sensitivity from an ecological perspective and “*The canalised portion of the canal has low habitat diversity with a **sterile** aquatic ecosystem*” (emphasis added) which is patently untrue. It will be helpful for the Project team to refer to works such as Suri, J. et al. (2017) More than just a corridor: A suburban river catchment enhances bird functional diversity *Landscape and*

*Urban Planning*, Volume 157, Issue null, Pages 331-342; and Bhika (2013) reporting on recent bird counts in the area:  
[https://open.uct.ac.za/bitstream/item/7672/thesis\\_ebe\\_2013\\_bhikha\\_p.pdf?sequence=1](https://open.uct.ac.za/bitstream/item/7672/thesis_ebe_2013_bhikha_p.pdf?sequence=1). It would also be helpful for the SRK team to view the photographic contributions of public on the Friends of the Liesbeek Facebook page.

3. There is a worrying trend of underreporting of occurring species in the area. *Lythrum salicira* (Purple Loosestrife), a Category 1a Invasive Plant Species' only known South African population occurs along the Liesbeek River and individual plants are often found on the site. If bulk earthworks were to go ahead as proposed (particularly the removal and disposal of top soil), there is a significant risk of dispersing this dangerous species which would have catastrophic effects on waterways across the country. An endemic fish species, the Cape Kurper (*Sandeliacapensis*) is unreported although occurring in the canalised section of the Liesbeek River. Bird species are also underreported, which is significant due to the disturbance that the Raapenberg Bird Sanctuary may experience- a key concern. There is also no mention of any mammalian species despite there being evidence of animals such as Cape Clawless Otters, Water Mongooses and Porcupines (to name a few). More consultation with stakeholders, friends groups and local residents needs to be entertained for the EIA report to hold any weight.
4. Possibly the most disturbing element of the Draft Report is the conclusion that is reached by Garfield Krige from his company African Environmental Development (2015). In a report he claims that "*raising the ground surface at the River Club to an elevation slightly above the 100-year flood elevation would not have any detrimental effects on neighbouring properties*" and adds that this finding is the "game changer" because it means that infilling of the site above the 1:50 year flood level can occur in line with a specific guideline contained in the Cape Town Floodplain and River Corridor Management Policy (2009). This finding underpins the entire development proposal yet we are unable to take this report seriously. Firstly, Mr Krige is not qualified as a hydrologist to reach such a conclusion – his formal training is in public health, water care, environmental law, auditing and environmental management systems. Secondly, we know that the data that informs any modelling of the Liesbeek River, at least, is fragmented, inconsistent and could not be used to without considerable correction and verification. We only know of one study that forms part of a doctoral study by Dr Lloyd Fisher-Jeffes that has use hydrological gauging data and Lidar data to model the flow of parts of the Liesbeek. The authors of the Draft Report have not consulted this researcher, currently a post-doctoral student in UCT's Urban Water Management Research Unit. Finally, we have struggled to access the report upon which this conclusion is based; a copy should be made available as an appendix to the Scoping Report. Flood modelling in an urban catchment is a complex science and could have serious consequences if the advice is incorrect.
5. Drainage receives far too little attention in the report. Reference to incorporating vegetated swales into the plan are still rudimentary and suggest that little thought has been put arresting runoff and potentially contaminated surface wash off into the adjacent rivers. There is evidence that the stormwater runoff originating from the suburb of Observatory that discharges into the Liesbeek, situated immediately upstream of the River Club, inputs elevated levels of nutrients into the system according to research by Ward, E. & Winter, K. (2016) Missing the link: urban stormwater quality and resident behaviour, *WaterSA* Vol 42 No. 4 (forthcoming). Investment in sustainable urban drainage appears to be extremely weak at this stage of the draft report and we advise the SRK to consult with the Urban Water Management research unit who have written the guidelines for Sustainable Drainage for South Africa.
6. The management of floodwaters in an urban catchment triggers the needs for planners, designers and developers to consider the whole catchment rather than a site in isolation.

The old adage applies, to quote John Muir, "When we try to pick out anything by itself, we find it hitched to everything else in the Universe." In this case, the 'universe' refers to the catchment. We are surprised that the River Club developers have not consulted with the Friends of Liesbeek and shown much interest in connecting with their plans and expertise. If they did so they could realise that it may be far more cost effective to invest in a managed flood abatement scheme that will not only manage flooding, but also improve the biodiversity of the lower Liesbeek. It is possible that there is no need for infilling the site to the 1:100 year floodplain.

We thank you for the opportunity to comment on this Draft Scoping Report and look forward to receiving feedback as well as participating in the process going forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Phil McLean', with a long horizontal flourish extending to the right.

**Phil McLean**  
**Chairperson**  
**The Friends of the Liesbeek**