



**WRITTEN SUBMISSION
OBJECTING TO PROPOSED
DEVELOPMENT OF OUDE MOLEN**



ATTENTION : Ms A. Hayes (omp@desertbloom.co.za)
cc Ms C. Postlethwayte (cindy@cpheritage.co.za)
and OMP Project Office (OMP@westerncape.gov.za)

COMPILED : Oude Molen Stables
FOR On behalf of Owner/Manager – Mr Kendre Allies,
Ms Georgie Ravenscroft and clients and supporters
of Oude Molen Stables



DATE : 31 October 2024

RE : HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF
OUDE MOLEN PRECINCT: PORTION OF ERF 26439-RE CAPE TOWN
WESTERN CAPE SEPTEMBER 2024 DRAFT FOR PUBLIC COMMENT To be
submitted in terms of Section 38(4) of the NHRA (HWC Case Number :
21022615SB0330E)

We hereby state our objection to the HIA assessment and proposed development of Oude Molen Precinct as referenced above.

Focusing primarily on HIA is applying tunnel vision to a far more complex issue, where heritage, environment, inadequate public transport, social injustice and biodiversity are completely intertwined.

The HIA report and development proposal is incompatible with this precinct which is diverse, delicate, multi-faceted and rich in historical, environmental, living, cultural and intangible heritage linked to the land.

This report is misleadingly presented in isolation of the large scale, large footprint of developments in close proximity to Oude Molen and across the Western Cape.

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OVERVIEW of OUDE MOLEN STABLES

Oude Molen Stables is owned and managed by Kendre Allies, a resident of Garden Village, whose family presence in the area goes back generations.

The first 'recorded' presence of horses on Cape land dates back to the 1600s.

The horses at the stables live as a 'natural' herd. They are rescued and rehabilitated and then integrated into the riding school, supporting and promoting the long-standing heritage of healing and education on this land.

This is their place of safety, a haven that rescued them, where they have built on their history together as a family – healing each other and the humans who interact with them.

The horses here have, and do work with : Valkenberg Hospital, Alexandra Hospital, NICRO, Schools and various therapeutic programmes – providing valuable support and healing to these entities who work with a wide variety of physical, mental and emotional conditions.

We cater to a variety of people from all walks of life, reliant on the horses and the open space to heal and guide them. People on the autism spectrum (more and more being diagnosed daily) cannot manage with the sensory overload that development is imposing. Many of our clients and patients attribute the horses and the environment in which they live, as not just having healed them, but having saved their lives.

Horses as non-humans are part of the cultural heritage in the histories, anthropologies, sociologies and geographies. Horses occupy space in human society and the manner in which animal and human lives intersect, shows how humans have identified their heritage in terms of animals.

THE PEOPLE of OUDE MOLEN and GARDEN VILLAGE

There is a living heritage that is remembered and treasured by Garden Village residents going back several generations. The surviving elders and adults of the community wish to preserve and leave a legacy of an untouched natural environment, rich in memories and cultural history, to their children and their children's children.

The owner of Oude Molen Stables, Kendre Allies has built on the heritage of the many generations of his family who came before him. He has worked his way out of a challenging environment, through interaction with Oude Molen Village – first working in the gardens and learning about sustainable growing to support families. Then being introduced to a cart horse to take fruit and vegetables to Observatory and Woodstock.

He then started to work with the horses who were kept at Oude Molen for lessons and pony rides. This is when the greatest healing of his life began – interacting with the horses and having access to their intangible ability to understand, thereby rescuing and rehabilitating him – as he does for them today.

He now shares his learned expertise as a community leader, with people from challenging backgrounds and with severe mental, emotional and physical issues – providing his horses for equine therapy. His transformational and inspirational journey through life, from broken to healed and healing, have been presented in television documentaries.

Passing on this heritage and legacy to his children and his grandchildren is what drives him to protect what saved and healed him, allowing generations to come, to share the beauty of their heritage in it's original and natural environment.

Their heritage and long-standing relationship with Oude Molen and surrounding land is one of the few things left to the Garden Village community. Not only can they not afford the proposed housing to be developed, but gentrification will directly impact the security and cost of living for current and longstanding residents of the area, who will no longer be able to afford to live where they grew up and where they and their families' heritage lies.

CONSERVATION and HERITAGE STATUS

Due to its conservation and historical importance, Rondebosch Common has provincial heritage status. In view of this, the same provincial heritage status should be an absolute given for Oude Molen.

Biodiversity – the Western Leopard Toad is just one example of an endangered species within this environment. Recent sitings in October (pic herewith).

NOTE – these sightings are *within* the proposed development area.

Also note that their environmental ground has, and is, being substantially reduced in adjacent areas being developed.



REQUEST

We request a full and current map of land that has been endorsed and developed, is in the process of being developed, and is due to be developed in the Western Cape government area over the past 5 years and in the next 10 years (to include the likes of Botmaskop, Amazon, River Club, King David Mowbray Golf Course, Rondebosch, Noordhoek etc etc).

This will provide a holistic impression of the true scale of gentrification and repurposing of biodiverse land. As well, it will highlight the extent of proposed development plans and their impact when viewed as a whole, spotlighting who benefits and, who and what will be negatively impacted.

Please provide before and after, as well as work in progress aerial views of these developments – past and present (and going forward).

NOTABLE COMMENTS

- Oude Molen and surrounds has a long history and heritage of healing and education from inception to this date. As such, it's imperative that the land and its occupants maintain their current role.
- The more you populate an area with buildings, people, vehicles, infrastructure, pollution and everything that goes with it – the less able you are to protect what little you propose to leave behind.
- You cannot maintain small green pockets and replant/recover areas of the environment and think it will maintain its biodiversity. It's like taking a home with six rooms with occupants and removing four rooms with the promise that they will be returned in the future. The occupants cannot survive in the smaller space and are forced to relocate, never to recover the value and security of what they once had. Garden Village is a prime example of this – having been compressed into a space which does not allow for regular and safe recreation for the elderly and youth.
- Are Amazon and River Club held up as an example of respected and protected heritage?
Said heritage is no longer recognisable.
- The HIA report patronises heritage by making mention of road names, plaques and street signs which reference the heritage. A street name has no space for a horse to move in and these cannot evoke the connection, healing and history that the actual space and environment does.
- Any further development (and there are a few pockets identified), means increased traffic. This with proposed closure of Alexandra Road at Berkeley - does not bode well for emergency services and healthcare in these areas.
As the planned public transport improvements for this year, have met with very little success - public transport will not be viable for many, many years to come.
Pollution will intensify - including sound pollution which has huge impact on the environment!

See : <https://www.jacarandafm.com/shows/drive/how-cape-town-plans-reducing-traffic-emptying-roads/>

- Development at the old Conradie Hospital is not completed and sections of the development are said to be bankrupt, with service providers left unpaid. If something with this potential has not succeeded, then those putting together proposals are certainly not qualified to deal with something far more delicate and biodiverse, with negative implications on the current home and business owners on the land and close surrounds.
- Why were historical visuals of land, either photographs or artistic renditions, not presented by Nigel Burls and Associates and Cindy Postlethwayte at the open meeting? It would have painted a much clearer picture of the reality of the devastating impact, showing the before and after.
- Why has closely-situated open land with seldom seen human or animal footprints not been explored? We refer : large sectors of open land at both Valkenberg and Alexandra hospitals.
This highlights that this proposal is financially driven and not about meeting the needs of the people and protecting the environment and the heritage it supports.

- The proposed development appears to have been formulated in isolation, ignoring previous reports, several sections of the current HIA report and being dismissive of the obvious need for an EIA.
- Growing need for housing is due to political decisions – both historical and financial. Foreigners and people from other regions are being encouraged to come to Cape Town, putting enormous pressure on current infrastructure and resources – impacting the security and cost of living for current and longstanding residents of the area, who will no longer be able to afford to live in the home they grew up in and where generations have lived and their family's heritage lies.
- Proposed gentrification means that rates and taxes based on new land values will impact on Garden Village.
- Increased crime, cost of living and traffic congestion, along with decreased access to open / uncluttered green spaces, is not in line with the heritage of this land.
- Cape Town's heritage belongs to generations of 'Capetonians' and not new arrivals or foreigners who are being catered for - creating an environment that we can no longer afford to live in.
- Environmental heritage would suggest that we reclaim the environment for the environment's sake and curb its exploitation.

A CONSIDERATE and RESPECTFUL DIRECTION to BE EXPLORED

Extend the heritage of healing and education – enhance the existing haven to treat anxiety disorders, depression, autism, alzheimers, down syndrome etc.

There are current buildings marked as Heritage, shown as being in repairable state, but it is proposed that they be demolished? Rather renovate and repurpose these for education, healing, or NGOs that can flourish in an environment that promotes healing and education.

Present Oude Molen as an accessible environmental and educational facility with historical cultural influences.

Capitalise on the tourism angle – showcasing a true eco village to be developed, with centres of healing, education within schools, sustainable growing of food, equine therapy and the like – highlighting heritage and history.

Provide educational and healing tours along the full TRUP area, through horse, pedestrian and cycling trails.

Oude Molen Eco Village to become the pride of Cape Town.

CONTRADICTIONS / REALITY VERSUS PROMISES / MISLEADING THE PUBLIC

At the open meeting, it was advised that if plans were approved, the property would then be sold off to developers. The use and development plans would then change according to the developer who purchases.

There is therefore, no sincerity or integrity behind these plans.

The only people to benefit are those that can afford it.

Why are there glaring differences between the latest proposed plans and the last I&AP interaction? This misleads and confuses stakeholders/public participants.

Why are we being shown proposals in isolation from the greater picture? See "**request**" in bold above. There is a pattern of overriding objections and exploiting the environment and the people of the Cape.

See Botmaskop video, Scar on the Mountain (Carte Blanche) – similar scenarios/pattern of exploitation and manipulation.

<https://www.youtube.com/watch?v=aVDI2PT172k>

Amazon : There is a gap between proposals and reality. How can one justify the raising of land and filling in of parts of a river adjacent to the Amazon development?

Aerial view of Amazon – February 2024

There has been massive/dramatic increase in the development footprint since then

Aerial view of Amazon – February 2020



Amazon continued : Refer to article content and see notes below.

<https://businesstech.co.za/news/business/699855/big-win-for-amazon-headquarters-in-south-africa/>

When did talks and negotiations with developers begin and when was public participation introduced?

Benefits claimed by Mayor Geordin Hill-Lewis – erroneous :

- In what way is Liesbeek River 'rehabilitated'?
- Refers to high quality green open space – however, the green space is massively reduced and what is left will need to be implemented from scratch and will no longer be positioned to support biodiversity.
- Claim to establish heritage infrastructure in partnership with First Nations groups – are these token plaques and little historical sites? And who are these *groups*? Reference the *plural* used which is contradictory as City and developers were selective in who from First Nations they finally reached agreement with.
- Construction jobs are temporary and who was hired? Local or foreign labour? Employment opportunities – local or foreign employees? And where is the economic benefit to affected communities as stated earlier in article?
- No public transport infrastructure established – rather a diversion that with new/further development proposals cannot support increase in vehicular traffic.
- 4.5 billion invested in the local economy – how was this distributed and utilised?
- Residential accommodation including 'affordable' housing. Affordable to who?! This caters to upper income brackets and foreigners.

South precinct development : Example of boundaries being pushed, outside of plans presented – South precinct – presented as a 7 story building and now 9 or 10 stories.



RESPONSES / ANSWERS – CONFLICTING WITH PRESENTATION

Below are points where Answers to Questions, do not match what was presented at the open meeting (or in writing).

Recently asked questions : <https://www.westerncape.gov.za/departments-of-infrastructure/oude-molen-precinct-recently-asked-questions>

VERSUS

HIA Oude Molen :

https://www.westerncape.gov.za/tpw/sites/tpw.westerncape.gov.za/files/atoms/files/1.%20DRAFT%20HIA%20Oude%20Molen%20September%202024%20for%20public%20comment_0.pdf

Comments to responses/answers on portal in *italics and green*.

- **What consultations have taken place with the local, neighbouring, and outlying communities regarding this development project?**

In 2021 the Department of Infrastructure (then Department of Transport and Public Works) convened various public engagement sessions as the initial stage of visioning where the public was presented with the status quo of the property and were asked to make inputs on their history and connection with the property as well as their aspirations for the property.

There was no feedback on this.

Plus – a dictatorial and patronising presenter who was not fully engaged.

- **What steps will be taken to mitigate any potential negative impacts of the development on the surrounding environment and ecology?**

The studies currently being undertaken will consider all available studies and assessments done previously, highlight any existing site-specific sensitivities, and propose any mitigation measures for implementation. This will be complemented by directives from mandated authorities where any of the National Heritage Resources Act 25 of 1999 (NHRA) or National Environmental Management Act 107 of 1998 (NEMA) listed activities may be triggered.

At the recent 'open meeting' the Nigel Burls presenter stated that they had not referred to any EIA as it wasn't called for.

The reference to "resume with site enablement investigations and assessments and undertake the required statutory processes..." statement in the Notice was to confirm that the enablement work is continuing, it is not a new process being started from scratch. The professional team comprises of new consultants as well as professionals that have previously engaged with the public. This professional team will assist the Department to take the Project into the statutory application processes.

Contradictory – at the recent open meeting Nigel Burls presenter said that the previous presentations were not relevant and this was a completely new exercise.

- **Prioritizing Maitland Garden Village residents for future housing opportunities**

During the preliminary engagements, the Professional Team and DoI were asked a similar question and responded that the mandate of this process is to investigate and determine the most appropriate land use mix for this Precinct aimed at potential future development proposals and securing the appropriate development rights to ensure better management of the Property and potential future development.

Any future housing stock forming part of the development; in the form of tenancy, occupation, or disposal, will be managed by the appropriate authority via the relevant policies, legislative frameworks, criteria, and processes.

So in essence – this means - no, Garden Village residents will not be prioritised.

- **Impact of development on biodiversity and ecology**

The Oude Molen site comprises the built area adjacent to Alexandra Road. It does not include the wider open space between the built area and the Black River which is zoned open space and owned by the City of Cape Town. The Site is not a declared conservation worthy area, and it is within a built urban context.

There are no environmental triggers and sensitivities on Oude Molen as confirmed by the Department of Environmental Affairs and Development Planning in 2022.

The site has been transformed and therefore no endangered vegetation species are found on-site.

Any development proposals will carefully consider the interface between Oude Molen and the Black River Corridor to mitigate any potential negative impacts; and appropriate open spaces will be included in the redevelopment portions of the Oude Molen site. Policy and legislative prescripts will be adhered to; and mitigation measures will be proposed, where appropriate and applicable. In reference to possible wildlife on the Site such as the Western Leopard Toad, relevant mitigation design measures will be considered in this regard, as appropriate.

What mitigation measures could one possibly take for the western leopard toad, in relation to the overbuilt land use?

- **Custodian / property management matters**

It was noted that “the precinct of Oude Molen Eco Village was given by the family who owned Oude Molen Eco Village Pinelands to the Province to act as Custodian. Where did province get the authority to sell the ground, the same illegal authority used to sell The Liesbeek park to Amazon and we are not stopping the fight we are going to as soon as tractors come in we are going to call in our Afrikan kings, queens and chiefs to assist us.”

The Department of Infrastructure (DOI) is the custodian of the property. This matter was raised in the previous consultation process and responded to where the DoI indicated that it is not the intention of this planning process or the proposed development to “sell and remove heritage.” Heritage resources and related matters will be managed as prescribed by the respective legislation primarily the National Heritage Resources Act.

The plans and answers to questions indicate that this is exactly what is being done – selling and removing heritage.

The heritage building being referred to is known as and referred to as the old Homestead complex or Miller’s House, and it is a protected heritage resource and asset. The Department is aware of the current dilapidated status and has activated the required processes to protect and save this resource by securing the required budget and procuring the relevant professionals and specialists to undertake the required investigations and assessments and apply for the relevant permits from Heritage Western Cape. This workstream is driven by the custodian representatives, Chief Directorate: Immovable Asset Management and Chief Directorate: General Infrastructure. This work is planned to restore the collapsed wall and other minor works required to secure the building from further deterioration and collapse. The building will be retained in any future proposals due to its heritage grading and it is seen as an important informant.

The fact that repair on the collapsing wall was halted, without explanation, leaving it to further decline is of concern and puts a question to motive.

The redevelopment of Oude Molen presents a transformative opportunity to unlock the area's economic potential and create substantial socio-economic benefits, while preserving some of its cultural heritage. In the broader context of the urban environment, the development of the Oude Molen site will capitalise on the strategic nature of the site as well as the broader economic opportunities. In addition, the development will provide affordable housing in a well located area close to work opportunities.

***HIA document – affordable housing is contrary to the Q&As
Clarify meaning : While preserving "some" of its cultural heritage.
See previous comments about 'affordable housing'.***

There is thus an significant beneficial socio-economic dimension to the re-development of the site. There is also the potential to bring new life to sorely neglected historical buildings, to finally locate the mill ruins and, more widely, extensive earthmoving could yield tangible evidence for the presence of Khoekhoen in the area, or King Cetshwayo's presence on the property

Why are several buildings noted as being in repairable condition then being noted as to be demolished? And why are buildings older than 60 years being demolished when they can be recovered?

SUPPORTIVE, DISTURBING and INFORMATIVE ARTICLES - HIGHLIGHTING DISPARITIES, CORRUPTION AND/OR QUESTIONABLE PRACTICES

Three weeks ago (as at 31 Oct 24) – Riverlands development

https://www.linkedin.com/posts/tony-korsten-1a2ab06_the-riverlands-development-in-observatory-activity-7247934626898341890-ydtw?utm_source=share&utm_medium=member_desktop

October 2024 - Social Housing Development / Rondebosch

<https://vocfm.co.za/civic-association-of-rondebosch-east-demands-clarity-from-the-city-about-the-social-housing-development/>

October 2024 - Cape Town Traffic / One of the most congested cities in South Africa

<https://www.jacarandafm.com/shows/drive/how-cape-town-plans-reducing-traffic-emptying-roads/>

On 16 June 2021, an article '[R4bn River Club development removing the cycle of Khoi and San invisibility](#)' was published. In the article, Jody Aufrichtig, director of the trust and "the man behind the River Club development in Observatory", stated that he was "sick of all the lies" from those opposing the development. He claimed the development would be "a cultural and historical hub" celebrating Khoi and San culture. This was based on a deal struck with a **new group** set up as the First Nations Collective headed by Zenzile Khoisan. In terms of the deal, Khoi and San symbols and street names would be included in the precinct, there would be an indigenous garden, and a First Nations media centre and an amphitheatre.

June and July 2021 articles -

<https://groundup.org.za/article/media-executive-linked-river-club-developer/>

The chief executive of Highbury Media joined the board of a company with links to the developers of the controversial River Club project in Cape Town soon after an editorial

criticising the development was removed from a Highbury publication and replaced by a series of articles favourable to the project.

June 2021 – article published criticising River Club development

Over the next week – three articles published in favour of the development

1 July 2021 – Chief Executive of Highbury Media listed as a director of an online shopping company set up by the developer of the River Club project, Jody Aufrichtig, and his brother.

May 2024 - DBSA encourages nature-positive investments

https://www.cbn.co.za/featured/dbsa-encourages-nature-positive-investments/?utm_source=mailpoet&utm_medium=email&utm_source_platform=mailpoet&utm_campaign=cbn-daily-titan-cargos-r140-million-100-000m-belcon-warehouse-has-direct-rail-link-to-the-port-of-cape-town-2888

June 2024 – Environmental challenges in Western Cape

<https://www.oudtshoorncourant.com/News/Article/Politics/bredell-reappointed-as-wc-minister-of-local-government-environmental-affairs-and-development-planning-202406140809>

Three weeks ago (as at 31 Oct 24), referenced above – Riverlands development / actual content :

The Riverlands Development, in Observatory, Cape Town, will soon be able to hand over significant services upgrades to the [City of Cape Town](#) and the [Western Cape Government](#). These upgrades include the new roadway and bridge linking Observatory with Ndabeni, the upgrade to Berkley Road, external bulk works surrounding the development, the Liesbeek riverine rehabilitation, upgraded sewerage works, and other external services upgrades. This R120 million project is part of the developer Zenprop's commitment to upgrade public infrastructure surrounding the [Riverlands](#) commercial, retail and residential precinct.

Significantly, the new road and bridge spanning the Black River will soon connect Liesbeek Parkway with Berkley Road and the M5, offering Cape Town a new way to connect the economic and industrial hubs from the city centre through Woodstock to Epping.

"The City welcomes the progress made on this critical infrastructure, which will be of great economic benefit and improve mobility in a critical part of Cape Town," said Mayor [Geordin Hill-Lewis](#).

Speaking during a ribbon-cutting event, James Tannenberger of the Liesbeek Leisure Properties Trust (LLPT) said that the project will be a permanent and positive enhancement to the daily lives of those who live in Cape Town. "This project isn't just about a road or a bridge—it's about enhancing the quality of life for every Capetonian, creating opportunities for businesses to thrive, and laying a foundation for future growth," he said.

The riverine rehabilitation has included removing the concrete bedding previously installed in a section of the Liesbeek River and returning the area to a more natural state. The section of the Liesbeek has now been replanted, and special care has been taken to create habitat for indigenous animal and birdlife. By cleaning up pollution, improving water quality, and restoring natural habitats, Riverlands is not just helping the environment, but also creating the structures to make Cape Town's waterways more resilient in extreme weather events.

The services upgrade, including the road and bridge project, was completed recently and will soon be handed over to relevant authorities to manage.

The Riverlands precinct will also soon be open to the public. Commercial tenants will start to occupy the precinct by this month, and the retail section will open in November. The retail section

will include blue chip anchor tenants such as Woolworths, Checkers, Clicks, Mr Price, Vida e Caffè, Cattle Barron and Nando's Restaurant.

The residential units at Riverlands have proven popular owing to the central location of the development, with over 65% of residential units already pre-sold. Riverlands's integration of commercial, retail and residential elements will create a vibrant and interconnected community where residents can live, work, and play within a single, safe precinct.

[Zenprop Property Holdings](#) (accompanied by pic including mayor Geordin Hill-Lewis)

