



NOTIFICATION OF INTENT TO DEVELOP

Completion of this form is required by Heritage Western Cape for the initiation of all impact assessment processes under Section 38(1) & (8) of the National Heritage Resources Act (NHRA).

Whilst it is not a requirement, it may expedite processes and in particular avoid calls for additional information if certain of the information required in this form is provided by a heritage specialist/s with the necessary qualifications, skills and experience.

A. APPLICABILITY OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NEMA)

HWC Case Number: 16113002	DEADP Reference Number:
NOTE: A DEADP (W Cape Dept. Environment Affairs & Development Planning) reference number must be included in all NHRA Section 38(8) processes where DEADP is the decision making authority under NEMA. The effect of this requirement is that the NEMA process must be initiated with DEADP prior to the NHRA process with HWC.	
If a DEADP reference number is not entered above please check one of the following boxes:	
<input checked="" type="checkbox"/>	This application is made in terms of Section 38(8) of the NHRA and an application under NEMA has been made to the following authority: National Department of Environmental Affairs (DEA)
<input type="checkbox"/>	This development will not require a NEMA application.
NOTE: Making an incorrect statement or providing incorrect information in this part of the form may result in all or part of the application having to be reconsidered by HWC in the future, or submission of a new application.	

B. BASIC DETAILS

PROPERTY DETAILS:

Name of property: Kloof Nek Water Treatment Plant (KNWTP)	
Street address or location (eg: off R44): Off Kloof Nek Road, Cape Town.	
Erf or farm number/s: Farm 854 (plant site) and Farm 851/remainder (pipeline route)	Coordinates: 32° 56' 53"S 18° 23' 37"E (A logical centre point. Format based on WGS84.)
Town or District: City of Cape Town	Responsible Municipality: City of Cape Town
Extent of property: Farm 854: 6.4678 ha Farm 851/remainder: 268.4547 ha	Current use: Water treatment plant on Farm 854, Table Mountain National Park on Farm 851/remainder.
Predominant land use/s of surrounding properties: Table Mountain National Park with residential to the west (Camps Bay).	

REGISTERED OWNER OF PROPERTY:

Name City of Cape Town and South African National Parks (please see attached letters)
Address

Telephone	Cell	E-mail
<p>By the submission of this form and all material submitted in support of this notification (ie: 'the material'), all applicant parties acknowledge that they are aware that the material and/or parts thereof will be put to the following uses and consent to such use being made: filing as a public record; presentations to committees, etc; inclusion in databases; inclusion on and downloading from websites; distribution to committee members and other stakeholders and any other use required in terms of powers, functions, duties and responsibilities allocated to Heritage Western Cape under the terms of the National Heritage Resources Act. Should restrictions on such use apply or if it is not possible to copy or lift information from any part of the digital version of the material, the material will be returned unprocessed.</p>		
<p>I confirm that I enclose with this form four hardcopies of all material submitted together with a CD ROM containing digital versions of all of the same.</p>		

Signature of owner or authorised agent
(Agents must attach copy of power of attorney to this form.)

Date / / 20

DEVELOPMENT DETAILS:

Please indicate below which of the following Sections of the National Heritage Resources Act, or other legislation has triggered the need for notification of intent to develop.	
<input type="checkbox"/> S38(1)(a) Construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier over 300m in length.	<p>S38(1)(c) Any development or activity that will change the character of a site -</p> <div style="border: 1px solid black; padding: 5px;"> <input type="checkbox"/> (i) exceeding 5 000m² in extent; </div> <div style="border: 1px solid black; padding: 5px;"> <input type="checkbox"/> (ii) involving three or more existing erven or subdivisions thereof; </div> <div style="border: 1px solid black; padding: 5px;"> <input type="checkbox"/> (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years. </div>
<input type="checkbox"/> S38(1)(b) Construction of a bridge or similar structure exceeding 50m in length.	
<input type="checkbox"/> S38(1)(d) Rezoning of a site exceeding 10 000m ² in extent.	
<input checked="" type="checkbox"/> Other triggers, eg: in terms of other legislation, (ie: National Environment Management Act, etc.) Please set out details: Under NEMA the proposed development requires a Basic Assessment Report (BAR).	
<p>If you have checked any of the three boxes above, describe how the proposed development will change the character of the site:</p>	
<p>If an impact assessment process has also been / will be initiated in terms of other legislation please provide the following information:</p> <p>Authority / government department (ie: consenting authority) to which information has been /will be submitted for final decision: National Department of Environmental Affairs (DEA)</p> <p>Present phase at which the process with that authority stands: pre-application phase</p>	

Provide a full description of the nature and extent of the proposed development or activity including its potential impacts (eg: changes in land use, envisaged timeframes, provision of additional bulk services, excavations, landscaping, total floor area, height of development, etc. etc.): The Kloof Nek Water Treatment Plant (KNWTP) is located on the property of the City of Cape Town, within the Table Mountain National Park. It is situated on the western slopes of Table Mountain above Camps Bay and services Camps Bay, Sea Point and the upper regions of the City Bowl with potable water. The KNWTP is owned and operated by the City of Cape Town and by virtue of its age, the building is a working monument.

The treatment of the raw water involves dosing it with coagulant (aluminium sulphate and sodium aluminate) which results in flocculation and settlement of the solids in the settling tanks. These settled solids, i.e. the residue, are drawn off twice a day and flow via an open channel into the Diepsloot stream, into the stormwater system and then out to sea. The residue contains organic compounds bound with aluminium salts and silt etc. The residue is regarded as unacceptable for discharge to an open water course and must be discharged by other means viz. to the sewer system. The residue disposal is currently being carried out at night to minimise the visual impact of the brown patch that forms in the sea at the outlet of the stormwater pipe near Camps Bay tidal pool or on the beach when there are high stormwater flows.

The City of Cape Town is required in terms of the Management of Urban Stormwater Impacts Policy (2009) to upgrade the residue disposal system. It is planned to construct a holding tank on a suitable site adjacent to the plant and lay a pipeline down the mountain side to connect with the sewer network. The holding tank will attenuate the flows into the proposed pipeline which is to link into the sewer in Dal Road, Camps Bay. The water treatment residue will then be pumped out to sea via the Camps Bay Marine Outfall Sewer. This may also necessitate the upgrading of sewer capacity in parts of Camps Bay.

The proposed pipeline would connect to an existing valve outside of the main building of the Plant and thus there will be no impact to the structure itself. It is proposed to remove the remaining ruins of the old caretaker/manager's house just below the plant and utilise the platform for construction of the holding tank. The pipeline would be supported on low brick piers, although where granite boulders exist along the route the pipe will be bolted to the boulders to reduce the amount of construction work. The last section above Camps Bay Drive (M62) will follow the existing footpath and this section will be buried beneath the path to reduce visibility from the road.

Since most of the project falls within the boundary of the Table Mountain National Park, it will be necessary to undertake an environmental assessment as well as a heritage impact assessment. The environmental body that will need to approve this process is the Department of Environmental Affairs (DEA).

Previously a Record of Decision was issued by the then Department of Environmental and Cultural Affairs and Sport (December 2001). Since construction didn't commence within the stipulated two years, the ROD has now lapsed and therefore the application needs to be resubmitted.

C. HERITAGE RESOURCES AND IMPACTS THEREUPON

Section 3 of the National Heritage Resources Act sets out the following categories of heritage resource as forming part of the national estate. Please indicate the known presence of any of these by checking the box alongside and then providing a description of each occurrence, including nature, location, size, type

Failure to provide sufficient detail or to anticipate the likely presence of heritage resources on the site may lead to a request for more detailed specialist information.

(The assistance of relevant heritage professionals is particularly relevant in completing this section.)

<p>Provide a short history of the site and its environs (Include sources where available): The Kloof Nek Water Treatment Plant was constructed in 1935 to treat water from the dams on Table Mountain. The house below the main building was built in the 1950s but burnt out and stripped of remaining materials in the 1990s. This used to be the house of the caretaker/manager of the plant. The remainder of the site is undeveloped with the exception of a kramat constructed on the lower slopes of the study area just above Camps Bay Drive (M62).</p>	
<p>Please indicate which heritage resources exist on the site and in its environs, describe them and indicate the nature of any impact upon them:</p>	
<input checked="" type="checkbox"/>	<p>Places, buildings, structures and equipment of cultural significance</p> <p>Description of resource: The Kloof Nek water treatment plant was built in 1935 to treat the water that came from the Table Mountain dams. The red brick building was designed by Patrick Henry Thomas Shillington and Franklin Kaye Kendall for the Cape Town City Council (http://cityofsunshineandstorms.blogspot.co.za/2012/03/fabulous-filtration.html).</p> <p>Description of impact on heritage resource: No impacts expected.</p>
<input type="checkbox"/>	<p>Places to which oral traditions are attached or which are associated with living heritage</p> <p>Description of resource: N/A</p> <p>Description of impact on heritage resource: N/A</p>
<input type="checkbox"/>	<p>Historical settlements and townscapes</p> <p>Description of resource: N/A</p> <p>Description of impact on heritage resource: N/A</p>
<input checked="" type="checkbox"/>	<p>Landscapes and natural features of cultural significance</p> <p>Description of resource: The development will be within land included in the Table Mountain National Park. The TMNP is part of a declared World Heritage Site which has cultural significance for its scientific value. The study area is thus within a significant landscape.</p> <p>Description of impact on heritage resource: The physical impact to the landscape will be negligible. It is intended to ensure that the water tank will be screened as much as possible and, as such, it is unlikely that significant visual impacts will occur. In any case, the tank will replace a ruined house which presents an eye-sore to passers by on the Pipe Track which runs just above the house platform. The pipeline will be painted a matt grey colour so as to blend in with the surroundings and minimise any visual impact it might have. Note that this colour was specifically requested by SANParks on the basis of minimising visual impacts. Because the section just above Camps Bay Drive will be buried, visibility from the road will be virtually zero.</p>
<input type="checkbox"/>	<p>Geological resources of scientific or cultural importance</p> <p>Description of resource: N/A</p> <p>Description of impact on heritage resource: N/A</p>
<input type="checkbox"/>	<p>Archaeological resources (Including archaeological sites and material, rock art, battlefields & wrecks):</p> <p>Description of resource: N/A</p> <p>Description of impact on heritage resource: N/A</p>
<input type="checkbox"/>	<p>Palaeontological resources (ie: fossils):</p> <p>Description of resource: N/A</p> <p>Description of impact on heritage resource: N/A</p>
<input checked="" type="checkbox"/>	<p>Graves and burial grounds (eg: ancestral graves, graves of victims of conflict, historical graves & cemeteries):</p> <p>Description of Resource: A single Muslim grave (kramat) occurs among the trees near the bottom of the slope and just above Victoria Road. Kramats are the burial sites of Muslim Holy Men.</p> <p>Description of Impact on Heritage Resource: There will be no direct impact to the grave site</p>

	<p>because the pipeline is routed so it misses the kramat by 10 m. It is not technically feasible for the pipeline to be diverted away from the kramat into the gully due to the following reasons;</p> <ol style="list-style-type: none"> 1. By routing the pipeline into the gully, it will have to be supported by piers - building piers on an unstable, steep slope will compromise the structural integrity of the pipeline by increasing the chance of warping which could lead to leaks. 2. By increasing the steepness of the pipeline, the water flowrate will also increase - this may cause water pressure to increase at bends in the pipe and will increase the chances of leaks. 3. The supporting piers will increase erosion on the slope, causing unsightly gulleys to form that will highlight the pipeline route and cause a negative visual impact. 4. Routing the pipeline onto the slope will pose challenges from a maintenance standpoint as access could be a problem. Building an access road is not an option as it will cause a negative visual impact. <p>The section of the pipeline at the footpath near the kramat will be buried underneath the footpath to mitigate any visual impact the pipeline might have. The pipeline will be painted a matt grey colour to act as camouflage and minimise the visual impact it might have on the environment. Because the pipeline would be above ground, there will be contextual impacts through the visibility of the pipeline among the plants nearby.</p>
<input type="checkbox"/>	<p>Other human remains:</p> <p>Description of resource: N/A</p> <p>Description of impact on heritage resource: N/A</p>
<input type="checkbox"/>	<p>Sites of significance relating to the history of slavery in South Africa:</p> <p>Description of resource: N/A</p> <p>Description of impact on heritage resource: N/A</p>
<input checked="" type="checkbox"/>	<p>Other heritage resources:</p> <p>Description of resource: Camps Bay Drive Drive can be regarded as a scenic route. It should be noted that the status quo creates a visual impact to the scenic route because when water is pumped out to the sea it creates a brown stain in the sea. Although quite clean, this stain is unsightly and should be avoided. It is considered that the pipeline will have a very small or probably negligible impact on the scenic route and this is far preferred to the status quo.</p> <p>Description of impact on heritage resource: No significant negative impacts are expected because the development will be virtually invisible from the road. A positive impact is expected because the unsightly stain in the sea off Camps Bay Beach will no longer occur when the pipeline is operational.</p>

Describe elements in the environs of the site that could be deemed to be heritage resources: as above

Description of impacts on heritage resources in the environs of the site: as above

Summary of anticipated impacts on heritage resources: Despite the presence of various heritage resources in close proximity to the proposed development, no significant negative impacts are expected to occur. The only impact would be a contextual (visual) impact to the kramat and this will be mitigated through painting the pipeline a matt grey colour. Importantly, a positive impact would be experienced because the unsightly brown stain in the sea off Camps Bay Beach would no longer occur when the pipeline is operational. This positive impact far outweighs any possible negative impacts.

NB: It should be noted that the vicinity of the Kramat has been earmarked by the EAP as a No-Go area and protocols have been established to ensure that it is protected during all stages of the proposed development. Please find attached the relevant text on No-Go areas that will be included in the Environmental Management Plan in order to ensure protection of the kramat.

ILLUSTRATIVE MATERIAL (This form will not be processed unless the following are included):

Attach to this form a minimum A4 sized locality plan showing the boundaries of the area affected by the proposed development, its environs, property boundaries and a scale. The plan must be of a scale and size that is appropriate to creating a clear understanding of the development.

Attach also other relevant graphic material such as maps, site plans, satellite photographs and photographs of the site and the heritage resources on it and in its environs. These are essential to the processing of this notification.

Please provide all graphic material on paper of appropriate size and on CD ROM in JPEG format. It is essential that graphic material be annotated via titles on the photographs, map names and numbers, names of files and/or provision of a numbered list describing what is visible in each image.

D. RECOMMENDATION

In your opinion do you believe that a heritage impact assessment is required? ☐ Yes ☒ No

Recommendation made by:

Name Dr Jayson Orton

Capacity Archaeologist and heritage consultant

PLEASE NOTE: No Heritage Impact Assessment should be submitted with this form or conducted until Heritage Western Cape has expressed its opinion on the need for such and the nature thereof.

E. INFORMATION TO BE PROVIDED AND STUDIES TO BE CONDUCTED AS PART OF THE HERITAGE IMPACT ASSESSMENT (HIA)

If it is recommended that an HIA is required please complete this section of the form.

DETAILS OF HERITAGE PRACTITIONERS AND SPECIALISTS INTENDING TO CONDUCT THE HIA:

1.	Name of individual:	Name of Practice:	Area of specialisation:
	Qualifications:		
	Experience:		
	Standing in heritage resource management:		
	E-mail Address:	Telephone:	Cell:
2.	Name of individual:	Name of Practice:	Area of specialisation:
	Qualifications:		
	Experience:		
	Standing in heritage resource management:		
	E-mail Address:	Telephone:	Cell:

3.	Name of individual: Name of Practice: Area of specialisation: Qualifications: Experience: Standing in heritage resource management: E-mail Address: Telephone: Cell:
4.	Name of individual: Name of Practice: Area of specialisation: Qualifications: Experience: Standing in heritage resource management: E-mail Address: Telephone: Cell:
5.	Name of individual: Name of Practice: Area of specialisation: Qualifications: Experience: Standing in heritage resource management: E-mail Address: Telephone: Cell:
If this submission is made in terms of Section 38(8) of the National Heritage Resources Act indicate below the particulars of the principle environmental consultant on the project.	
Name of individual: Jako Schonken Name of Practice: Silito Environmental Consulting Area of specialisation: Environmental assessment E-mail Address: jako@environmentalconsultants.co.za Telephone: 021 712 5060 Cell: Postal Address: Suite 105, Block B2, Tokai Village Centre, Vans Road, Tokai, Cape Town, 7966	

DETAILS OF STUDIES TO BE CONDUCTED IN THE INTENDED HIA

In addition to the requirements set out in Section 38(3) of the NHRA, indicate envisaged studies:	
<input type="checkbox"/>	Heritage resource-related guidelines and policies.
<input type="checkbox"/>	Local authority planning and other laws and policies.
<input type="checkbox"/>	Details of parties, communities, etc. to be consulted.
<input type="checkbox"/>	Specialist studies, eg: archaeology, palaeontology, architecture, townscape, visual impact, etc. Provide details:
<input type="checkbox"/>	Other. Provide details:
PLEASE NOTE: Any further studies which Heritage Western Cape may resolve should be submitted must be in the form of a single, consolidated report with a single set of recommendations. Specialist studies must be incorporated in full, either as chapters of the report, or as annexures thereto.	