



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:	DEADP Reference Number: To be obtained when the application is submitted to DEA
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: Van Riebeeckstrand and Duynefontein (See Figures and Plates attachment)	
Street address or location (eg: off R44): Van Riebeeckstrand & Duynefontein off the R27 (Figure 1)	
Erf or farm number/s: Erf 3619; Part of the original Erf 200; Part of the original Erf 2633	Coordinates: 33 41.691S 18 26.636E (A logical centre point. Format based on WGS84.)
Town or District: Duynefontein, north of Melkbosstrand	Responsible Municipality: Cape Metro
Extent of property: Cable on land is +- 1.4km in length	Current use: Road servitudes and service corridors in a residential development
Predominant land use/s of surrounding properties: Beach and residential developments	

REGISTERED OWNER OF PROPERTY:

Name City of Cape Town - Property Management (Contact Person: Dirk Maree)
Address P O Box 35, Milnerton, 7435

Telephone 021 5901619	Cell N/A	E-mail dirk.maree@capetown.gov.za
<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 checked="" 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.	S38(1)(c) Any development or activity that will change the character of a site - <input type="checkbox"/> (i) exceeding 5 000m ² in extent; <input type="checkbox"/> (ii) involving three or more existing erven or subdivisions thereof; <input type="checkbox"/> (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years.
<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: NEMA	If you have checked any of the three boxes above, describe how the proposed development will change the character of the site:
If an impact assessment process has also been / will be initiated in terms of other legislation please provide the following information: Authority / government department (ie: consenting authority) to which information has been /will be submitted for final decision: National Department of Environmental Affairs (DEA) Present phase at which the process with that authority stands: Project notification stage and Scoping	

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.): MTN (Pty) Ltd proposes installing a submarine telecommunications cable, referred to as the Africa Coast to Europe (ACE) cable system, linking South Africa, the West Coast of Africa and Europe, with international hubs in Europe. The cable, where possible, will be buried up to 2m below the seabed to protect it from damage by fishing and shipping activities.

The ACE Phase 2 submarine cable system, running from Sao Tome and Principe (an island off the west coast of Africa), will travel a distance of 1527 km landing at Duynefontein along the South African coast. This cable route has already been surveyed (using echo-sounder, magnetometer and sonar images) by EGS (Asia) Limited between April - May 2016, with seabed features, shallow seabed geology, bathymetry and geomorphology mapped along the route (the report is attached to this NID).

MTN (Pty) Ltd propose that the ACE Cable System will land at Van Riebeeckstrand and terminating at the MTN Cable Landing Station at Duynefontein on the West Coast of South Africa (Figure 1). This NID is concerned with the cable once it arrives on land.

The proposed development involves the landing of a submarine cable at Van Riebeeckstrand Beach (Figure 3) and then the laying of a cable from the beach to the Beach Man Hole (BMH) which will be located on the edge of the residential suburb of Van Riebeeckstrand (Figure 2). From the BMH, the ACE Cable System will be buried through the suburbs of Van Riebeeckstrand and Duynefontein along existing servitudes and along road verges until it reaches the Cable Landing Station (CLS) which is located in Duynefontein (Figures 2 & 4). All disturbed areas will be rehabilitated.

From the shoreline to the BMH, the cable will be buried to a depth of 2 m using mechanical diggers such as TLBs and excavators or through horizontal drilling (Plates 1 & 2). It is important to note that if mechanical diggers are used the depth of excavations through the primary dunes may be significantly deeper than 2 m due to the elevated height of the primary dunes in relation to the surrounding environment. Based on observations on site, it is likely that the excavated depths through the primary dunes will be as deep as 7-9 m.

The Beach Man Hole (see Figures) for both the proposed landing alternatives being considered for the ACE Cable System are located on the edge of the residential area of Van Riebeeckstrand within previously disturbed areas, which are accessible using an existing road network (Figure 1 & 2). Typically, the BMH will have the following dimensions (Plates 3 & 4):

Height: 2m;
Length: 4m
Width: 2m

The role of the BMH is to provide an anchor point for the submarine cable near the beach and also to enable the tie in of the land-sea cable which will run from the BMH to the CLS site.

From the BMH, the ACE Cable system will be buried to a depth of approximately 1- 1.2m through the residential areas of Van Riebeeckstrand and Duynefontein along existing service corridors, roads and servitudes. The development footprint along the cable alignments is not expected to exceed 2m in width with the width of the actual trench dictated by the width of the TLB or Excavator bucket. As such, it is anticipated that the trench width will not exceed 1m in width.

Two alternative alignments have been proposed:

Alignment A (Preferred alignment) = 1.5 km in length from the primary dune to the CLS site;
Alternative B (Alternative 2) = 1.4 km in length from the primary dune to the CLS site.

As far as possible, the cable alignments will follow existing roadways, tracks and existing servitudes through the suburbs of Van Riebeeckstrand and Duynfontein.

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.)

Provide a short history of the site and its environs (Include sources where available): Palaeontology: the study area falls in the palaeontologically sensitive area of the West Coast which stretches from Saldanha in the north to Woodstock beach in the south. The Koeberg area is known for the fossils which have been recovered both from DFT2 (see below) and DFT1 (also at Koeberg). It is possible that Springfontyn and Langebaan formation sediments, containing fossiliferous deposits, may occur. However, it is important to note that the depth of the excavations for the cable of 2m, in the road servitude, are unlikely to encounter any significant fossil material which has not already been disturbed.

Archaeology: The well known site of Duynfontein 2 (DFT2) is located to the north of the Koeberg power station (2 km north along the coast). It has been extensively researched by Klein and colleagues. The upper horizon (H1) is deflated, beneath this is the main horizon (H2) which is thought to have been deposited around 270 000 years ago. Initially thought to be of Middle Stone Age association, the presence of broken handaxes, points to the Early Stone Age.

Later Stone Age material has been recorded in the vicinity of the Koeberg power station (Kaplan 2015). The material seems to be in secondary context. While LSA material is very common along the Cape West coast, they are more prolific close to rocky shorelines, like further south at Melkbosstrand. The coastline at Van Riebeeckstrand is sandy, and this means that LSA middens and burials are less likely to occur. Numerous impact assessment reports are available for the Melkbosstrand area further to the south.

A short site visit was conducted on the 29th September 2016. No archaeological material was observed along the route of the cable.

Burials: Stone age burials are frequently encountered behind the rocky shores of Melkbosstrand but are also far less common behind sandy shores. Numerous reports are available.

There are no aspects of the Built Environment which will be impacted and since the cable is going to be underground, there are no impacts to the Cultural Landscape.

In terms of the NHRA, any material below the high water mark, is the responsibility of the national heritage resources authority (SAHRA). This relates to any shipwrecks which may occur off the coast of South Africa. With respect underwater heritage, SAHRA has been notified via SAHRIS of the proposed underwater cable off Van Riebeeckstrand/Duynfontein and their comment is awaited.

However, it is important to report that the cable route has already been surveyed by EGS (Asia) Limited between April - May 2016, with seabed features, shallow seabed geology, bathymetry and geomorphology mapped along the route. According to the report, a "wreck from database is present at

~KP1474.6 with an offset 20m southeast of Route Option 3, but not found during the survey" (Page vi of the attached survey report). Since this assessment is concerned with Route Option 2 (Van Riebeeckstrand and Duynefontein) and not Route Option 2 (Melkbosstrand), this is not an issue of concern. A diver swim survey was conducted offshore and according to the report, the seabed is characterised by fine sand, and no presence or obstructions for a 10m wide corridor on both the routes.

There are no specific records of shipwrecks off the beach at Van Riebeeckstrand. According to the webpage of the Blaauwberg historical interest group, there are numerous shipwrecks off the Blaauwberg coastline. There is unfortunately, very little specific information on the exact location of the wrecks and they cannot be identified as falling within the area of the undershore cable. Bloubergstrand is 10km south of Van Riebeeckstrand. The Rygersdal (1747), for example, was wrecked off Silwerstroomstrand, which is 14km north of the study area.

References:

Hutten, L. 2014. Preliminary report on the rescue excavation of exposed human skeletal remains at 75 Mostert Road, Melkbosstrand, Western Cape.
 Orton, J. 2010. Archaeological excavations at erf 164, Melkbosstrand, Malmesbury Magisterial District, Western Cape. Unpublished report for Wilmos cc.
 Orton, J. 2014. Archaeological test excavations on Erf 1694/REM, Melkbosstrand, Cape Magisterial District, Western Cape. Unpublished report for FJC Consulting.
 Sealy, J., Maggs, T., Jerardino, A and Kaplan, J. 2002. Excavations at Melkbosstrand: Variability among herder sites on Table Bay, South Africa. South African Archaeological Bulletin. Vol 59(179):17-28.
 Shipwrecks of the Blaauwberg coastline. <http://www.blaauwberg.net/history/shipwrecks.php> (accessed 27 Sept 2016).

Please indicate which heritage resources exist on the site and in its environs, describe them and indicate the nature of any impact upon them:

<input type="checkbox"/>	Places, buildings, structures and equipment of cultural significance Description of resource: n/a Description of impact on heritage resource: None
<input type="checkbox"/>	Places to which oral traditions are attached or which are associated with living heritage Description of resource: n/a Description of impact on heritage resource: None
<input type="checkbox"/>	Historical settlements and townscapes Description of resource: n/a Description of impact on heritage resource: None
<input type="checkbox"/>	Landscapes and natural features of cultural significance Description of resource: n/a Description of impact on heritage resource: None
<input type="checkbox"/>	Geological resources of scientific or cultural importance Description of resource: n/a Description of impact on heritage resource: None
<input checked="" type="checkbox"/>	Archaeological resources (Including archaeological sites and material, rock art, battlefields & wrecks): Description of resource: LSA shell middens may be buried under the surface within the residential development of Van Riebeeckstrand and Duynefontein. A site visit on 29 September 2016, did not identify any archaeological remains on the surface. Description of impact on heritage resource: If there are any sub-surface archaeological

	remains, they will have been significantly disturbed by the houses, roads and associated infrastructure in the area. The cable will not result in any additional impacts
<input checked="" type="checkbox"/>	<p>Palaeontological resources (ie: fossils):</p> <p>Description of resource: Fossiliferous material belonging to the Springfontein and Langebaan Formations may occur underneath the residential development of Van Riebeeckstrand and Duynefontein</p> <p>Description of impact on heritage resource: If any material occurs under the road, or in the road reserve, they will have been significantly disturbed and will be out of context. The cable will not result in any additional impacts.</p>
<input type="checkbox"/>	<p>Graves and burial grounds (eg: ancestral graves, graves of victims of conflict, historical graves & cemeteries):</p> <p>Description of Resource: n/a</p> <p>Description of Impact on Heritage Resource:</p>
<input checked="" type="checkbox"/>	<p>Other human remains:</p> <p>Description of resource: Later Stone Age burials may occur underneath the residential development and roads at Van Riebeeckstrand and Duynefontein.</p> <p>Description of impact on heritage resource: Trenching may uncover human remains, however, they will have been significantly disturbed and will not be in context. A protocol for recovering human remains must be implemented.</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:</p>
<input checked="" type="checkbox"/>	<p>Other heritage resources:</p> <p>Description of resource: Underwater heritage offshore off the South African coastline, is in terms of the NHRA, the responsibility of the national heritage authority - SAHRA.</p> <p>Description of impact on heritage resource: Potentially, the laying of the submarine cable system, could impact on shipwrecks off this section of the coast. The survey by EGS (Asia) Limited (2016) of the submarine cable route, while alerted to the potential of finding shipwrecks, did not encounter any wrecks during their sonar, magnetometer and echo-sounding survey (attached).</p>

Describe elements in the environs of the site that could be deemed to be heritage resources: The most important terrestrial heritage resources in and around the residential development of Van Riebeeckstrand and Duynefontein are archaeological (including pre-colonial graves) and palaeontological. There are no Built Environment issues. The Cultural Landscape will not be impacted by an underground cable.

Description of impacts on heritage resources in the environs of the site: There are no anticipated impacts to heritage in the ENVIRONMENT of the proposed cable. Any impacts, if they are to occur, will be direct impacts to below ground heritage resources.

Summary of anticipated impacts on heritage resources: The only impacts on land which could result from the construction of the 1.4km underground cable, are disturbance of palaeontological and archaeological remains. However, it must be emphasised that the cable would be laid in the road reserve, of the existing residential area of Van Riebeeckstrand and Duynefontein. If there are any palaeontological or archaeological remains, below the ground, they have already been disturbed and possibly damaged. It is highly unlikely that in situ material will be found in the road reserve.

An archaeological survey on 29 September 2016 along the route of the cable did not identify any archaeological traces.

In my opinion, further specialist studies will not reveal any additional information. It is recommended that developer be alerted to the possibility of uncovering human remains.

This NID document, together with other documentation (such as the BID document and kml files) have been uploaded to the SAHRIS database for their comment.

However, it is important to report that the cable route has already been surveyed by EGS (Asia) Limited between April - May 2016, using sonar, magnetometer and echo-sounders, to map seabed features, shallow seabed geology, bathymetry and geomorphology mapped along the route. No shipwrecks were reported (see attached report).

Written comment was sought from the Regional Manager: Environmental & Heritage Resource Management (Pat Titmuss) and his/her comment is attached:

"Based on the information provided, the recommendation by the heritage specialist that no further studies are required, is supported".

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 Lita Webley

Capacity Heritage Practitioner

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.	<p>Name of individual: Lita Webley Name of Practice: ACO Associates cc Area of specialisation: Archaeology</p> <p>Qualifications: PhD in Archaeology</p> <p>Experience: 19 years</p> <p>Standing in heritage resource management: ASAPA accredited CRM heritage practitioner</p> <p>E-mail Address: lita.webley@aco-associates.com Telephone: 021 706 4104 Cell: 072 179 6219</p>
2.	<p>Name of individual: Name of Practice: Area of specialisation:</p> <p>Qualifications:</p> <p>Experience:</p> <p>Standing in heritage resource management:</p> <p>E-mail Address: Telephone: Cell:</p>
3.	<p>Name of individual: Name of Practice: Area of specialisation:</p> <p>Qualifications:</p> <p>Experience:</p> <p>Standing in heritage resource management:</p> <p>E-mail Address: Telephone: Cell:</p>
4.	<p>Name of individual: Name of Practice: Area of specialisation:</p> <p>Qualifications:</p> <p>Experience:</p> <p>Standing in heritage resource management:</p> <p>E-mail Address: Telephone: Cell:</p>
5.	<p>Name of individual: Name of Practice: Area of specialisation:</p> <p>Qualifications:</p> <p>Experience:</p> <p>Standing in heritage resource management:</p> <p>E-mail Address: Telephone: Cell:</p>
<p>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.</p>	
<p>Name of individual: Giles Churchill Name of Practice: ACER Africa Area of specialisation: EIA applications</p> <p>E-mail Address: giles.churchill@acerafrica.co.za Telephone: 035 340 2715 Cell: 082 9079738</p> <p>Postal Address:</p>	

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: No further heritage studies are recommended. This NID recommends Alternative A.

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.