

From: Emily Vowles <EmilyVowles@westerncape.gov.za>
Sent: Tuesday, 26 August 2025 15:12
To: Jonathan Kaplan <jonathan@acrm.co.za>
Subject: RE: HWC25032707EJV0523 - Farm 143 Portions 15; 24; 25, Klipheuvél, Moordkuil Raw Water Extraction Works and Pump Station, Klein Brak River

Good Day Jonathan

Thank you for your enquiry.

In response to the s38(8) – Notification of Intent to Develop (NID) submitted for the upgrade of the raw abstraction works and pump station, Heritage Western Cape (HWC) issued a comment on 3 June 2025 under case number HWC25032707EJV0523 / 25244EJV0523 that No Further Studies in terms of heritage were required for the proposal. While the layout and therefore the preferred alternative have been amended, the proposal is still substantially in accordance with the proposal reviewed by HWC and deemed to not have an impact on heritage resources. No further action in terms of the National Heritage Resources Act is therefore required – our previous Record of Decision (RoD) still stands.

Should the project be revised to such an extent that it is no longer substantially in accordance with what was reviewed by HWC, a further NID must be submitted for assessment.

[HWC Migration to SAHRIS](#)
[HWC 2025 Committee Schedule](#)

Kind regards

Emily-Jane Vowles
Heritage Officer

Heritage Resource Management Services
Protea Assurance Building Greenmarket Square, Cape Town

Website: www.hwc.org.za / www.westerncape.gov.za



APPLICATION FORM
NOTIFICATION FOR INTENT TO DEVELOP (NID)
Section 38(1) and Section 38(8)

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).

As per Section 38(1)(e) of the NHRA, submission of the NID must be initiated at the earliest stage of development. Should the development trigger any other legislation, practitioners may submit the NID without formal submission to other statutory bodies in order to comply with the NHRA.

This form is to be read in conjunction with the HWC Notification of Intent to Develop, Heritage Impact Assessment, (Pre-Application), Basic Assessment Reports, Scoping Reports and Environmental Impact Assessments.

All sections of the form must be completed in order to deem the application to be complete.

Making an incorrect statement or providing incorrect information may result in all or part of the application having to be reconsidered by HWC in the future, or submission of a new application.

HERITAGE WESTERN CAPE REFERENCE NO., AS PROVIDED DURING SCRUTINY:

25032707

SECTION A

APPLICATION MADE IN TERMS OF:

- ☐ Section 38(1) of the NHRA (This development will not require a NEMA application)
- ☒ Section 38(8) of the NHRA (This development requires an application with another authority)
- ☐ Amendment of approved Site Development Plan (SDP) for endorsement. Endorsements are only reviewed upon submission of an assessment by the heritage practitioner confirming heritage design indicators as approved are not compromised by the revision
- ☐ Advice in terms of Section 38(1)

APPLICABILITY OF OTHER LEGISLATION:

Specify the authorised department that makes the final decision in terms of NEMA (National Environmental Act.), i.e. Department of Mineral Resources, Department of Environmental Affairs and Development Planning Western Cape, Department of Forestry, Fisheries and Environment etc.: **Department of Environmental Affairs and Development Planning (DEADP)**

Reference number of authority / government department: _____

Present phase at which the process with that authority stands: **Application Phase, but an Environmental Impact Assessment (EIA) process will be followed in this application**

Sharples Environmental Services is the appointed Environmental Assessment Practitioner responsible for facilitating environmental authorisation for the project.

PREVIOUS HWC APPLICATIONS APPLICABLE TO THE SITE AND OR DEVELOPMENT

Provide details of any previous applications submitted to HWC on the site.

HWC Reference No.	NHRA Section	Summary of Proposal	Application Status (Approved, Not Approved, Pending)	Permit / Record of Decision Date

SECTION B

DETAILS OF SITE, PROPERTY OR PLACE

Physical address or Location (e.g., of the R44): **The site is at the existing raw water abstraction works & pump station on the Moordkuil River bank in Klein Brak River, near Mossel Bay. Access to the site is off the N2 onto Blesbok Road and then via an existing gravel road to the site (Figure 1 & 2)**

Erf or Farm Name and No. (including the name of the site): **Portion 15, 24 & 25 of the Farm Klipheuvel**

Coordinates for logical center point (WGS84): **34° 3'14.4"S 22° 8'10.2"E**

Town: **Klein Brak River**

District / Municipality: **Mossel Bay Municipality**

Property Extent: **n/a in this application (Figure 3-5).**

Current land Use: **Moordkuil Abstraction Works & Pump Station**

Current zoning: **Agriculture**

Predominant land uses of surrounding properties: **Moordkuil River, Klipheuvel Dam, Agriculture**

SECTION C

APPLICANT / AUTHORISED AGENT – Details of person to receive Record of Decision

Name: **Dick Naidoo**

Company: **Mossel Bay Municipality**

Address and postal code: **Private Bag X29, Mossel Bay, 6500**

Phone number: **044 606 5082**

E-mail: dnaidoo@mosselbay.gov.za

Signature: 

Date: **29 April 2025**

REGISTERED OWNER OF PROPERTY

Name: **Dick Naidoo**

Identity number of applicant:

Address and postal code: **Mossel Bay Municipality, Private Bag X29, Mossel Bay, 6500**

Cellular phone number: **044 606 5082**

E-mail: dnaidoo@mosselbay.gov.za

Declaration: I **Dick Naidoo** am fully aware of this application and accept its contents and declare that I intend to undertake the actions as proposed in this application.

Signature:  Date: 29 April 2025

SECTION D

DETAIL OF PROPOSED DEVELOPMENT

Provide a full description of the nature and extent of the proposed development.

The existing Moordkuil Pump Station design is outdated and is not able to be maintained/repared due to the unavailability of parts and other maintenance restrictions. It is therefore required to upgrade the raw water abstraction works and pump station with more modern technology that will be low maintenance, cost effective and efficient.

The following is proposed to be constructed:

- Construction of a new reinforced concrete inlet hopper structure for the pump station;
- Construction of a pipe protection ramp structure for the pipes into the existing pump station building.
- Reinstatement of the existing gravel access road from Blesbok Road to the site (180m long and 3.6m wide) by reinstating the existing gravel road, within the same footprint, which has become almost impassable due to water ingress into the existing layer works (farmers leaking irrigation channel). The final road is proposed to be 3m wide.
- A new concrete road (in an already disturbed area mostly). The footprint of the proposed new road is about 500m² and ranges in width from 3m to 7.4m (in order for a 5-ton truck to turn around);
- Construction of an access ramp to the hopper;
- Construction of a new water meter chamber alongside the pump station. The development footprint of the water meter chamber is approximately 20m²;
- Replacement of three air-valves and construction of new chambers around the air-valves;
- Installation of new pipework, pumps and motor control centres;
- Installation of other mechanical items such as cover, trash-racks, etc.
- Upgrading of the electrical supply and breakers within the existing pump station building;
- Installation of a sediment barrier downstream of the crossing to curb sediment generation in the river, and
- Final reinstatement of the river bed to the requirements of the CEMP;

The concrete inlet hopper structure is proposed to be anchored to the bedrock by means of piling foundations. In order to install the piles, a pile rig needs to obtain access in the correct position. It is for this reason that a temporary platform structure is required to be constructed within the Moordkuil River.

The area where the inlet hopper (and the associated pile foundations) is proposed to be constructed is below the 1:10 year floodline, within the river. It is therefore required to construct a coffer dam around the area where the inlet hopper structure is proposed to be built in order to have a dry area for construction and concrete setting.

All of the above, except for the proposed temporary platform, cement access road, new water meter chamber and sediment barrier, will be located within the existing development footprint.

It is also proposed to demolish the existing underwater cement bag wall, existing above water concrete steps and the existing underwater concrete plinths for the existing pipes.

Three alternative site camps have also been proposed, with Alternative Site Camp 1, being the proposed alternative (refer to Figures 9-23)

A Site Layout Plan showing the proposed construction activities as outline above is illustrated in Figure 19

DEVELOPMENT DETAILS – Indicate which sections of the NHRA, or other legislation which requires a NID

PLEASE TICK THE APPROPRIATE BOX	
☐	Section 38(1)(a) Construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier over 300m in length.
☐	Section 38(1)(b) Construction of a bridge or similar structure exceeding 50m in length.
Section 38(1)(c) Any development or activity that <u>will change the character of a site</u> :	
☒	(i) exceeding 5 000m ² in extent.
☐	(ii) involving three or more existing erven or subdivisions thereof.
☒	(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years. *If (i), (ii) and/or (iii) are marked above, describe how the development will change the character of the site The development will not change the character of the site. There will, however be a temporary work site camp (refer to Figure 3), but the work site will be dismantled on completion of the project
☐	Section 38(1)(d) Rezoning of a site exceeding 10 000m ² in extent.
☐	Other triggers e.g., in terms of other legislation (NEMA, etc.) – Describe the details: NEMA

ESTIMATED CONSTRUCTION COST AND/ OR VALUE OF DEVELOPMENT UPON COMPLETION: R _____

SECTION E

PROVIDE A SHORT HISTORY OF THE SITE, PROPERTY OR PLACE – Include sources where applicable

The existing raw water abstraction works and pump station on the Moordkuil River have been in operation since 1980 and was designed to abstract 800 litres per second of water from the Moordkuil river and to pump the water to the Klipheuwel Dam for storage. The Klipheuwel Dam is one of four reservoirs from which Mossel Bay residents receive their water.

A Basic Assessment process was conducted in 2018 however, the Environmental Authorisation lapsed and a new application for Environmental Authorisation is required.

ANTICIPATED IMPACTS ON HERITAGE RESOURCES

Section 3 of the NHRA 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.

IDENTIFICATION OF ALL HERITAGE RESOURCES ON THE SITE, PROPERTY OR PLACE AND ITS ENVIRONMENTS

Please indicate where applicable:

	Places, buildings, structures, and equipment of cultural significance: Description of Heritage Resource: Descriptions of Heritage Impact: n/a
	Places to which oral traditions are attached or which are associated with living heritage: Description of Heritage Resource: Descriptions of Heritage Impact: n/a
	Places to which oral traditions are attached or which are associated with living heritage: Description of Heritage Resource: Descriptions of Heritage Impact: n/a
	Historical settlements and townscapes: Description of Heritage Resource: Descriptions of Heritage Impact: n/a
	Landscapes and natural features of cultural significance: Description of Heritage Resource: Descriptions of Heritage Impact: n/a
	Geological resources of scientific or cultural significance: Description of Heritage Resource: Descriptions of Heritage Impact: n/a

	Archaeological resources – Incl. archaeological sites and material, rock art, battlefields, and wrecks etc.: Description of Heritage Resource: Stone tools Descriptions of Heritage Impact: Low
	Palaeontological resources – i.e., fossils, geological formations etc.: Description of Heritage Resource: Descriptions of Heritage Impact: According to Professor Marion Bamford (attached), 'The Moordkuil River Pumpstation project lies entirely on the Quaternary sands and alluvium along the river valley that is indicated as moderately sensitive. The area is highly disturbed from agriculture and present thick vegetation, so it is very unlikely that any transported Quaternary fossils occur there. In addition, any fossil material would be fragmented and unidentifiable, plus it would be out of primary context. The true palaeosensitivity should be low'. 'The proposed sites for the camp site are on the Enon Formation and indicated as very highly sensitive. This palaeosensitivity is contested because the Enon Formation is a conglomerate with boulders, pebbles and sands and is a "dump" for such sediments that were deposited from the Cretaceous to the Tertiary which means there are no fossils that could assist with the dating. Furthermore, both sites are also highly disturbed from previous agriculture and clearing' (Bamford 2025).
	Graves and burial grounds – e.g.: ancestral graves, graves of victims of conflict, historical graves, cemeteries etc.: Description of Heritage Resource: Descriptions of Heritage Impact: n/a
	Sites of significance relating to the history of slavery in South Africa: Description of Heritage Resource: Descriptions of Heritage Impact: n/a
	Other heritage resources: Description of Heritage Resource: Descriptions of Heritage Impact: n/a

PROVIDE A SUMMARY OF THE ANTICIPATED IMPACTS ON HERITAGE RESOURCES

Anticipated impact on heritage resources: LOW

SECTION F

RECOMMENDATION

In your opinion, do you believe that a Heritage Impact Assessment (HIA) is required?

☐

Yes

☒

No

Specialist studies to be provided as part of the HIA:

	Architectural (i.e., fabric analysis, historical analysis, material analysis etc.)
	Archaeological Impact Assessment
	Paleontological Impact Assessment
	Townscape Assessment
	Cultural Assessment
	Social Historical Study
	Visual Impact Assessment
	Other:

Recommendations made by: **Jonathan Kaplan – Agency for Cultural Resource Management**

ASAPA CRM Membership No. 64

Capacity: **Heritage practitioner / archaeologist**

PLEASE NOTE

Any further studies which HWC requires should be submitted 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.

Please refer to the Guidelines for Heritage Impact Assessments required in terms of Section 38 of the National Heritage Resources Act (25 of 1999).

Applications are considered to be public documents and are open to public scrutiny. Should you wish for your application to be kept confidential, please motivate your request on a separate sheet attached to your application form.

For applications that are granted confidentiality, this confidentiality will be limited to one year (12 months).

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