



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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Case ID: 24017

Date: Thursday, 26 June, 2025

Interim Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

City of Cape Town: Bulk Services Department
City of Cape Town
8 Voortrekker Road, Bellville Water & Sanitation Head Office, 2nd Floor
Bellville
Cape Town
7530

City of Cape Town is proposing to construct a 70MI/day desalination plant on the old Cape Town Port Industrial Park (PIP) site in Paarden Eiland, Cape Town Local Municipality of Western Cape. The plant will consist of three intake pump stations, two duty and one standby pump station, will be installed to supply seawater to the raw seawater holding tanks. If it is found necessary the number of pumps may increase. A network of existing surface and underground culverts exist around the PIP site. These will be used as seawater and brine pipeline corridors linking the desalination plant to the shore. All corridors are located in the harbour and are thus previously disturbed. The existing structure is over 75 years in age and will be demolished during construction activities.

A NID was submitted to the application by Asha Consulting (Pty) Ltd and the response from Heritage Western Cape. The NID indicates that this development is undertaking a section 38(8) application process.

The SAHRA issued an interim comment dated 01/04/2025 requesting the submission of the environmental documents and Heritage Impact Assessment report. The draft scoping report was submitted on 20/06/2025.

Interim Comment

The SAHRA notes the submission of the draft Scoping report however, we require the submission of the following still outstanding as requested in the first Interim Comment dated 01/04/2025:

The SAHRA requests that an assessment of impacts to heritage resources inclusive of a field survey of areas below the high-water mark must be conducted as part of the EA process. The Maritime and Underwater Cultural Heritage Impact Assessment (MUCHIA) must comply with section 38(3) of the NHRA. The assessment of archaeological resources and other historical resources below the high-water mark must be completed by a qualified maritime archaeologist and comply with the SAHRA 2007 Minimum Standards:



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Archaeological and Palaeontological Components of Impact Assessment Reports. The minimum standards do make a provision of the submission of a letter of recommendation from an exemption from conducting a Heritage Impact Assessment.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

Further comments will be issued upon receipt of the above requested reports.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Nokukhanya Khumalo
Senior Heritage Officer
South African Heritage Resources Agency

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency



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Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

ADMIN:

Direct URL to case: <https://sahris.org.za/node/354931>