



OBSERVATORY
Civic Association

60 Trill Road
Observatory
7925
31st October 2024

Attention: Ms Hayes

Comments on the Oude Molen HIA – case number 21022615SB0330E

Please find attached comments on the HIA for the Oude Molen site as invited.

I would appreciate confirmation of receipt of our comments and appendices to be sent by We Transfer.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Leslie London'. The signature is fluid and cursive, with a large initial 'L'.

Leslie London
Chairperson

Comments on the OMP HIA from the Observatory Civic Association

1. The HIA is premised on a recurrent theme that it must respond to a broader spatial justice imperative (page 3, point 3) and that a development located at the juncture with the “Cape Flats (generally defined by the historical lack of privilege and removal)” is “spatially and symbolically ideally located to recognise the history of the site and simultaneously address the pressing historical spatial injustices of this City.” In fact, the HIA uses the term “apt” to describe the redevelopment proposal for the site. We point out that
 - a. The City and the Province have not achieved spatial justice across their planning for the City as a whole in their consideration of other developments. For example, [Ndifuna Ukwazi has had to turn to the Constitutional Court](#) to fight for spatial justice in seeking to oppose state sell-off of well-located land suited for inclusive housing. It is unclear why some developments should attract the moniker of spatial justice whereas in other settings, spatial justice is subordinated to economic gain.
 - b. Just down the hill from OM, the City approved a massive mixed use development at the River Club against objections by local communities and indigenous groups. The private development, which claimed it would help the housing shortage facing Cape Town, is now advertising luxury accommodation with no evidence of the claimed affordable housing.
 - c. It would seem that claims to spatial justice are made all too frequently and are abused in order to justify inappropriate developments when it suits the landowner. The relationship to spatial justice is superficial and never examined critically. Given the massive housing shortage in Cape Town, any development, including, for example, the building of low-cost housing on Robben Island, could be argued in the same vein to be worthy of approval because of reasons of spatial justice. This is illogical.
 - d. There is no clear explanation in the HIA as to why the development should, as a nett effect, promote spatial justice when it is displacing city businesses and residents and will have gentrification effects on the nearby community of Maitland Garden Village. It may well exacerbate spatial injustice but this is not considered in the HIA.
 - e. Within the same precinct, the City has land currently used to park its vehicle sat Ndabeni that could be repurposed for affordable housing and redress of spatial justice. Why is spatial justice not being pursued in terms of the land used by the City to park its vehicles nearby when spatial justice is used to make proposals for a dense development that will destroy the cultural and social fabric of the area, not to mention the livelihoods of small enterprises that have re-developed the area as an eco-village?

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- f. Lastly, it is clear that the redevelopment of Oude Molen could be accomplished consistent with spatial justice with limited intensity of development on the part of the site that could accommodate such development (along Alexandra Rd and near Vincent Palotti) without the imperative for dense population high-rise development proposed for the whole site.
2. The idea that the HIA can be based on conceptual proposals that “are high-level by design” and that the proposal is at “this high level” and will “require greater finessing” is potentially problematic if it does not set indicators that are sufficiently specific and robust to ensure that development does not destroy heritage resources on site. Currently, the HIA fails to produce heritage indicators that are protective of heritage resources because it plays along with the ‘high-level by design.’ The same approach was used by the developers of the River Club when proposing their HIA to HWC for approval, claiming that the HIA did not need to provide any restrictions on the built form of the development as that would follow later. HWC specifically rejected that approach in that case. We believe the same is applicable for Oude Molen.
3. The HIA adopts the position that the overall significance of the site can be detached from the different precincts and elements on the site. We believe this is a serious flaw that downplays the significance of the Site as a whole.
 - a. For example, while the HIA notes that “Components of the site have outstanding heritage value such as the homestead precinct” and the combination of the open flood plain to the west and on-site qualities of place, which is borne of its layered history, represent a relatively uncommon rich historical nexus embedded within the City”, it does not recognise the whole site as of outstanding value. Given that the TRUP as a whole is being considered for Grade I status, we believe this assessment is incorrect and risks destroying heritage resources that the HIA does not specially identify nor grade as sufficiently heritage-worthy – particularly related to cultural heritage and sense of place.
 - b. In 2020, the same consultant was responsible for a draft HIA for the Two Rivers Urban Park (TRUP). That HIA was submitted to HWC for comment.
 - c. Notably, the HWC IACOM, in October 2020 (minutes 9 Oct 2020), was concerned about the lack of consideration to and mapping of intangible heritage resources regarding the TRUP. The same dynamic appears to be playing out here.
 - d. In fact, in HWC IACOM did not approve the HIA for the TRUP and many of reasons apply to the Oude Molen HIA. IACOM noted then that the HIA structured the TRUP into 10 landscape areas, which prevented holistic assessment of the heritage of the site. This would lead to fragmentation and “little opportunity to bed down significance and collective understanding of the heritage resources pertaining to the TRUP in a holistic manner.” (Special IACOM Minutes 9 October 2020). Given the way

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the HIA has framed heritage resources for Oude Molen (for example, the site has links to a Tussen die Rivier landscape rather than being part of it), we anticipate similar challenges with treating heritage in a fragmented manner.

4. While the HIA notes that the WCG Tender terms of reference 2023 indicates that “Development alternatives will be assessed in the HIA Assessment Phase” (see Background, page 4), no such alternatives are presented in the HIA. The No-Go alternative is not acceptable as an alternative since it forecloses any possibilities of a lighter footprint for the development and sets up an all-or-nothing decision. Since Oude Molen residents and I&APs in TRUP co-design processes have, over the past 5 years or more, indicated their willingness to engage over alternative proposals, particularly if co-designed, there is no reason not to consider and recommend less intense developments on the site if that is what is needed to protect heritage resources. The HIA fails in that regard.
5. The HIA proposes that the site is of Grade II significance. buildings, archaeological, visual and other heritage resources (p4 and elsewhere). However, the practitioner ignores the fact that
 - a. SAHRA are currently busy with a process to consider grading the entire site as Grade 1 (Appendix 1)
 - b. Contrary to the statement on page 74, SAHRA have not rejected the application for grading but are actively in the process of assessment.
 - c. Case 16907 did not pertain to the TRUP but to an application for Provisional Protection of the River Club site, an area also located in the TRUP but distinct from Oude Molen.
 - d. It was Heritage Western Cape itself that responded to a nomination of the TRUP as a Provincial Heritage Site by concluding there was sufficient evidence for Grade I status to warrant referral to SAHRA in July 2021. SAHRA are still busy with assessment.
 - e. It is inexplicable that a heritage practitioner of Posthlethwayte’s experience could mistake the application for heritage grading to SAHRA, which is still pending as having been “not supported by SAHRA” on the basis of confusing a Provisional Protection application for the River Club with an application for grading of the TRUP as a national heritage resource. This is a material misrepresentation to HWC.
 - f. It is a serious flaw in the HIA that the report makes no mention of an active grading process underway by SAHRA, particularly given that this was a recommendation made by HWC regarding the TRUP.
6. The HIA fails to make clear recommendations for heritage indicators. It does so, partly because it fails to identify heritage resource adequately and because it irrevocably wedded to the scale and intensity of the development proposal put forward by the

landowner. In our view this is the biggest flaw in the HIA. This leaves the matter of protection of heritage resources to subsequent planning processes, which have no guarantee of effectiveness, in the absence of clear guidance as to what has been approved and what has not. For example:

- a. In the Exec Summary (page 4), it goes to great lengths to suggest that building development on site could be 'screened' in term of visual elements if "Existing mature trees" were "successfully retained." Why would the HIA not mandate the retention of existing trees or at the very least, include retention of trees as far as possible?
 - b. Further, on page 5, the HIA relegates the requirement for "protection of trees during construction" to "future building designs when the SDP is prepared."
 - c. Similarly, on page 6, the HIA abdicates the responsibility to provide clear heritage indicators when it argues that "Should the proposed development include architectural detailing which 'scales' down to meet sensitive heritage resources" then "the development proposals are certainly achievable without compromising the urban quality and may in fact enhance the experience of the city...". It is unclear why the recommendations are simply that the proposed development MUST include architectural detailing which 'scales' down rather than 'if'.
 - d. This is again illustrated in how the HIA imagines visual impacts (which it frames as "not yet sufficiently resolved with respect to the potential overwhelming of the heritage fabric and sense of place"). Instead of providing clear indicators that will attempt to protect heritage, it is relegated to "require further exploration at detail design stage." Given that the HIA recognises the potentially overwhelming impacts, it not acceptable that heritage indicators to protect those heritage resources are absent from the report.
 - e. Similarly, the argument that "architectural detailing will be required to mitigate the sharp contrast in scale between the proposed development and the Maitland Garden Village interface to the north" tells us that the HIA provides no guidance in that regard.
 - f. Again, on page 6, it is stated that "Meaningful mitigation can reduce the significance of the heritage related impacts" but the measures proposed are deferred "to be addressed at later stages in the development process." To repeat, in the absence of robust, evidence-based indicators to protect heritage, later stages of development is simply too late.
7. We draw attention to the fact there was a Baseline Heritage Study commissioned for Oude Molen, produced by O'Donoghue et al, in 2022. This baseline study is not appended to the HIA; only excerpts are cannibalised for reproduction in the HIA. The

reasons for this become obvious on a simple reading of the two HIAs. They come to substantially, if not diametrically opposite conclusions. For example:

- a. The Baseline HIA produces 24 pages of detailed Heritage indicators (Appendix 2) specific to each domain: built environment, Site Character, Visual design, Social Design, Cultural Landscape and Overarching Heritage indicators. In contrast, the current HIA has 11 pages of text devoted to heritage indicators, which are focused on Indigenous Heritage, Tangible Heritage resources (with detailed recommendations for 6 of the buildings on site), landscape, archaeology and other development sensitivities. There is no mention of Site Character, Social Design or Cultural landscape other than the Khoi indigenous elements and no overarching indicators. It is therefore short on key detail which cannot guide subsequent development.
- b. More importantly, the indicators diverge substantially in what they propose. For example, the baseline study proposes that to conserve the overarching site character, there should be low densities of the built form, buildings set within a parkland setting, integrate, as far as possible, existing mixes of land use, pattern of community use and use of the land for educational, agricultural and recreational activities, with more intense development allocate to the part of the site on Alexandra Road and adjacent to the Vincent Pallotti precinct. This HIA makes no such indicators. Instead, it takes as a given, the intense footprint within the precinct and pay little attention the current land use in favour of the proponents' intention. This is because the living heritage and sense of place of the site has not been adequately characterised in the HIA.
- c. We are concerned that such an important discrepancy has been hidden from the public eye and that the Baseline HIA was not available to the public in the consultation process. We believe that had this document been made public, a greater number of inputs would have been forthcoming. As it is, HWC only released this document to us with less than 10 days left to comment, which has made it difficult to go into detail in our comments.
- d. We therefore urge HWC to consider the HIA incomplete since it does not justify the departure from the baseline HIA conclusions.
- e. Such a pattern is consistent with the River Club development where the Baseline Heritage Assessment came to the conclusion that the chief heritage resource of the site associated with the cultural heritage of indigenous groups was the OpenSpace of the site. The developers, seemingly unhappy with her conclusions, managed to replace the consultant with another heritage expert whose reports were diametrically opposed to the baseline HIA and sought to justify the heavy development footprint sought by the landowners. It is hard to avoid the conclusion that the same pattern is being followed here.

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- f. I remind HWC that the HWC Council, in rejecting the River Club HIA in its Final Comments in Feb 2020, noted that “the HIA has unfortunately reduced this significance to a set of ecological values. provided for the most part to post-rationalize a wholly intrusive development model, rather than inform appropriate development.” We believe that without careful consideration of the recommendations of the Baseline HIA and its rationale, the current HIA merely rationalizes a “wholly intrusive development model, rather than inform appropriate development”, which is what an HIA should do.
8. We are exceptionally disturbed that the HIA can come to the conclusion that “the overall benefits to onsite and associational heritage and the pressing demands of the City” are said to justify increased building density, the loss of some buildings (of lesser significance), and a loss of informality”.
 - a. Firstly, the development will protect some heritage resources but destroy others. The HIA gives no evidence-based assessment of the relative balance of protection versus destruction of heritage resources in asserting that benefits of heritage protection weigh in to justify social and economic benefits.
 - b. Secondly, the idea that the pressing demands on the City regarding socio-economic redress can override heritage protections is not the task of an HIA. To quote from HWC’s Final Comments on the River Club HIA, dated 13 February 2020, “The heritage significance of the site should be the primary informant of any development” and should not be contingent or subject to economic objectives. As was the case with the River Club, we believe the handling of socio- economic benefits of the development does not take adequate cognisance of the significance of the site. The HIA does not fulfil the function intended but rather is one that justifies a pre-determined development proposal. Socio-economic benefits cannot trump heritage because the proponent is unwilling to consider any alternative development. To reiterate HWC’s view regarding the River Club HIA, while “it is acknowledged that there may well be a potential economic benefit lo developing the site,” it is also the case that “there has been no attempt to develop an argument or acknowledge the impact of the development balanced against a site which has been recognized previously by HWC as being of Provincial. if not national significance.” Given that SAHRA are currently considering the grading of the whole TRUP, we believe the same is applicable to this HIA for Oude Molen.
 - c. Moreover, socio-economic benefit can arise from a development that will meet the City’s pressing needs but without damaging heritage resources. That would entail consideration of a development that has clear heritage indicator to shape the extent, heigh and density of build, and limit its impact on heritage resources. There is no need for an HIA to accept the scale of the current development as necessary to meet the City’s pressing demands.

- d. We note as well that the harms from the proposed development described as justified in the HIA are said to be the impacts on sense of place (which has been sanitised as an 'altered' impact rather than adverse impact) and the reduction of the character of the site - framed as "bucolic." This is a deeply mistaken and patronising view of the character of the site. "Bucolic" invokes notions of an idealised rural life with farm animals and herdsman. This is far from the reality of the Eco-village which have a wide diversity of livelihood, leisure, cultural and educational activities taking place in a green space in the urban metropole. It is precisely this combination of activities in an eco-village that makes it unique rather than 'bucolic'. If the HIA believes that the character of the site is 'bucolic', it has clearly failed to understand the living heritage and significance of the site.
- e. Lastly, the social and economic study on which this claim to meet the pressing needs of the City is based is one that did not interview any of the current occupants or users of Oude Molen nor residents of Maitland Garden Village, but used desktop research. Interviews were seemingly only conducted "with local developers in the study area." (page 13, para 2.3). This is a clearly biased orientation and one that starts from the perspective that local residents, services and small businesses are of no importance. Frankly, I am amazed that a Social and Economic Assessment can makes zero reference to the impact on existing people and livelihoods, particularly when the introductory comments in the HIA state that "consideration is to be given to retaining ... existing productive economic activity within this precinct" which would "where possible, be incorporated into the possible redevelopment precinct proposals."
- f. In fact, the Socio-economic assessment makes no effort to measure the current economic contribution of the current activities in the eco-village. It is astonishing that it an come to a conclusion that "By transforming the site into a mixed-use development led by residential units but also incorporating commercial (office) and retail opportunities, the development, together with the other initiatives in the area will start to create a mixed-use node which will allow broader economic benefits to start to be developed for the wider spatial area" without reference to the social, environmental and economic contributions currently made by the existing community. For example, the Archeological Specialist Study as part of the Baseline HIA notes that "amount of vegetation present, especially mature trees, is notable" and that "aerial photography shows that much of the growth dates to within the last two decades" (page 201, para 8.3.2). The role of the local community in stewarding a green space is totally ignored in this HIA, unlike the baseline HIA which recognised their contributions.

9. It is the case that the HIA included a Social Assessment (Ron Martin) but no annex is presented which outlines what this entailed nor is any report provided. The HIA make a claim that various local residents and businesses were interviewed regarding Social Impact (see Pages 150 to 151) but these interview took place more than 3 years ago, and were part of the baseline HIA. Their views were correctly captured by the baseline HIA (see Appendix 3). However, since the current HIA has completely omitted the substance of the baseline HIA and come to diametrically opposite conclusions to the baseline HIA, the interviewees should be told why their views were now discarded. In 2021, when these interviews were conducted, there was no development on the table. Given that the development proposal has changed substantially, now populated with quite dense mixe-use development, it is unclear how relevant interviews conducted before an application was on the table are to the current HIA. Moreover, we note that the letter from HWC responding to the NID under background (Annexure A) points out that the HIA must be conducted with full consultations with communities whose heritage is affected by the development. We believe that consultations three years ago, before a dense mixed-use development was on the table, does not meet the requirements for adequate consultation.
10. The HIA appears to pay undue deference to tangible heritage. Examples of this are:
- a. Page 3: While the HIA acknowledges that “Considerably varying levels of tangible and intangible heritage significance are proposed for individual buildings, groups of buildings, archaeological, visual and other heritage resources” it adopts the position that it is acceptable that the redevelopment of the site can be “expressly designed around the retention and re-purposing of the primary tangible heritage resources.”
 - b. Page 5: “... presents a transformative opportunity to unlock the area’s economic potential and create substantial socio-economic benefits, while preserving some of its cultural heritage.” Why should only ‘some’ cultural heritage be retained, and which elements of cultural heritage are being sacrificed for socio-economic benefits?
 - c. Page 5: The HIA frames the development as being able to “tangible evidence for the presence of Khoekhoen in the area, or King Cetshwayo’s presence on the property.” It is not necessary to rely on the “extensive earthmoving” in the proposed development to establish the links of the Khoikhoi to the area or the historical record of King Cetshwayo’s banishment. This reflect again, an undue deference to tangible heritage when the intangible heritage is already established. It is a bizarre idea that a dense redevelopment of an area is justified by the possibility that cultural artefacts or remnants might be discovered, when the process of redevelopment is itself destructive of heritage resources that are not tangible.
11. The HIA fails to recognise the contribution of the eco-village residents and businesses to the recovery of the site, which was vandalised and neglected after the exit of Valkenberg Hospital. For example,

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- a. While it is true that redevelopment provides the “potential to bring new life to sorely neglected historical buildings”, the HIA neglects to recognise that the eco-village community, in partnership with the provincial government, have over decades managed to avoid the worst consequence of the vandalism and neglect that prevailed before the Eco-village took root. So, while further restoration is needed, it is ironic that the destruction of the Eco-village, as proposed in the development, would be required for this purpose. There is no reason why a re-development could not both enhance the eco-village characteristics of the site, whilst still enabling restoration of historic buildings whose upkeep is the responsibility of the Provincial government not the residents.

12. The HIA’s ‘Response to Indigenous Heritage’ is deeply flawed.

- a. The HIA makes extensive reference to the “Tussen Die Riviere Resistance and Liberation Heritage Route” as a DCAS project – see the MECs parliamentary response on 4 Sept 2020 at <https://www.wcpp.gov.za/?q=node/10881> in which she notes that “the Department is initiating a feasibility study in order to establish how this heritage will be commemorated.” However, despite referring to the project 12 times and mentioning the “Tussen die Riviere study” on page 86, the HIA does not include the report or a link to where the report can be read. The report is attached as Appendix 4.
- b. It is quite clear, on reading the “Tussen die Riviere study”, that it provides absolutely no basis for the HIA to conclude that the development proposals are achievable without compromising heritage resources. For example, the Tussen die Riviere” report frames the entire Two Rivers Urban Park as a park, not as a development area with park-like aspects. Oude Molen is part of this park not separate from the park in the view of the report. Yet the HIA speaks about a “Tussen die Twee Riviere landscape” to which there should be links made (see page 142). This implies the Tussen die Twee Riviere is separable from Oude Molen and is a gross misreading of the Tussen die Twee Riviere report.

13. Further, the Twee Riviere report noted that the Park “should be a site of living memory, identity building and identity discovery”, it “should be alive and full of activities – they are spaces that needs to be used and thus should be designed for as wide a range of activities for all ages as possible”, that the “Urban Park should be of a very high quality, comparable, or even better than the Green Point Urban Park.” It states quite clearly that “The Oude Molen site is best placed as the primary node” for the Park. The activities proposed in the Twee River report for the site include sensory play parks for children, water-play areas, skateboarding, climbing wall, outdoor gym, bike rentals, a rooibos experience centre, historical observation decks, learning pods, performance spaces/community hall, theme routes, food and beverage offerings, art studios, herb garden and nursery, horse trails, skills training and general exercise opportunities. These

are clearly not remotely feasible with the scale of development proposed by the landowner. Ironically, the current ecovillage fulfils many of these activities which will be lost should the development be approved. Yet, the HIA ignores this positioning of Oude Molen as primarily an open public space in favour of pre-ordained plan for a dense mixed-use development. We are concerned that elements of the Tussen die Riviere report have been cherry picked to support a view of heritage protection that is not authentic to the evidence.

14. Again, given that I&APs did not have sight of the full Tussen die Riviere report, but only the selected elements presented by the HIA, we do not believe they have had fair opportunity to comment and therefore the flawed public participation should preclude approval of the HIA.
15. Moreover, the narrative provided in the HIA on the recent case of the River Club (now Riverlands) development is extraordinarily one-sided in setting out as facts the interpretation of one group of indigenous leaders in what was a highly contested and fractious conflict between different groups over the River Club. While the First Nations Collective purports to speak with authority for indigenous groups in the Western Cape, it is incontrovertible that the River Club application was opposed by a very wide range of Khoi and San entities, one of which went to court and many of whom provided affidavits in support of that opposition. Not only does the HIA quote the leader of the Goringhaiqua (who was a vocal supporter of development in the River Club area) but it cites sources that are published by the FNC – Eerste Nasie Nuus - which regale the reader with the “Artist’s impression of the WCFNC Media & Heritage Centre.”
16. Given that the HWC Final Comment on the River Club HIA noted multiple problems, including lack of impartiality, contestation of processes and lack of inclusiveness (see paragraph 97 of the comment) in the HIA, and that despite warning the developer about the lack of meaningful engagement with the First Nation Groups as being problematic, it still concluded that the engagement with parties did not comply with requirements of act and rejected that HIA and its reports. However, the HIA here for Oude Molen appears to rely on the outcome of the Environmental Approval by DEADP, which was declared unlawful by HWC in their appeal against the EA, to frame how this development should respond to Indigenous Heritage. That is clearly flawed.
17. The HIA appears to hand the stewardship of the indigenous narrative regarding this development to one entity (the First Nations Collective) within a very complex landscape of indigeneity and multiple groups contesting who can speak authentically for the Khoi. In fact, there is presence of other groups in the OM site, with the Goringhaicona hosting a kraal and indigenous garden on site. They have had the presence on the site for many years, a fact not mentioned by the HIA.

18. However, it seems the HIA considers the Goringhaicona presence of such low significance that it has recommended the Kraal be relocated elsewhere linked to the Tussen die Riviere RLHR. That it makes this recommendation without even consulting the Goringhaicona is extraordinary, particularly since it has handed the stewardship of the Khoi narrative and the Tussen die Riviere RLHR at Oude Molen to the Gorinhaiqua, a group that bitterly opposed the Goringhaicona over the River Club. For an HIA to make these arbitrary and partisan political value judgements in a climate of very high contestation of indigeneity, signals that the HIA has taken sides in an existing conflict. It also signals that the HIA is unable to assess the impacts on Cultural Heritage in a dispassionate and impartial manner. It cannot be accept as meeting the requirements of law.
19. Notably, the letter from HWC responding to the NID (Annexure A), notes that the HIA must be conducted with full consultations with communities whose heritage is affected by the development. There is no evidence in this HIA that the community whose kraal is directly affected have been consulted; only that the voice of a 'competing' Khoi group is given full opportunity to express itself in this HIA.
20. It is unclear why the HIA recommends a blanket demolition of the buildings older than 60 years identified in Figure 160 in this report. In any event, the Figure is inaccurate. For example, it slates the Nurses Home (Block A) for demolition when the building was constructed in 1919. Similarly, the H-sharped ward us over 60 years old but marked for demolition in the Figure. Since the HIA includes and annexures all the detail building inventories from the Baseline study, it is not clear why the HIA is not following the recommendations of the Baseline study.
21. It is unclear why archaeological indicators should only be considered during design development phase of this project going forward. Of note is that AIA report attached to the HIA recommends only test trenching in the vicinity of the mill, whereas the AIA report for the baseline study recommends more extensive trench testing across the precinct, not only at the mill area and the homestead area, but across the entire site to enhance the confidence that it is possible to work outside the vicinity of the mill and homestead. Both AIAs note that while graves are not likely findings, they are possible in the area. The baseline AIA also notes that there is a good likelihood of Stone Age artefacts present in the area, though the finds are likely sporadic and chance finds.
22. We believe that the recommendations of the Baseline Study are more robust and consistent with good evidence-based heritage. This would be a better approach than currently contained in the HIA which we do not believe meets the requirement of the NHRA.

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Appendix 1: Confirmation of SAHRA process of assessing TRUP for Grade I heritage status and case number

Appendix 2: Baseline Heritage Study – Heritage Indicators

Appendix 3: Extract from Baseline Heritage Study regarding

Appendix 4: Tussen die Riviere report