PRE-APPLICATION PHASE DRAFT HERITAGE IMPACT ASSESSMENT
PROPOSED DEVELOPMENT OF SPLIT PORTION FARM 281-RE, MARINE DRIVE, STRUISBAAI

To be submitted for Interim Comment in terms of Section 38(8) of the NHRA
HWC Case Number: HWC23090406CH0904

Prepared For Helemika (Pty) Ltd

Prepared by Cindy Postlethwayt, Professional Heritage Practitioner
E: cindy@cpheritage.co.za

EXECUTIVE SUMMARY

1. Site

The property concerned, an unsubdivided (split) portion of Farm 281-RE, Struisbaai is situated on the sea side (south) of Marine Drive, opposite its intersection with Adelle Street (although this section of the street is yet to be constructed). The coastal town of Struisbaai is located in the Bredasdorp district and essentially contiguous with the coastal settlement of L'Agulhas. The split portion of the property affected is 0.71 ha in extent but the overall landholding, from which it is proposed to be subdivided, in the first instance, is 474.8209 ha in extent, for the most part (excluding the subject portion) outside the urban edge and all zoned Agriculture. It is undeveloped, not farmed and in its natural state as part of the coastline.

2. Description of Proposed Development

The preferred alternative proposes to subdivide the site into residential opportunities with access provision. It is not a limited access estate and as such, only the general provisions of the zoning scheme are applicable to height, coverage, massing etc.

The layout takes into consideration the 5m contour line; the High Water Mark; and the High, Medium and Low Risk Coastal Zones.

It includes:

- Five Single Residential Erven of between 549 and 588m^2;
- One Medium Density Residential Erf of 630m^2 intended for two dwellings;
- A parallel private road access alongside Marine Drive;
- A 1.5m wide public footpath along the western boundary, providing access to the beach below the High Water Mark.
- A Private Open Space of 2,713m^2 comprising the beach and some of the rocky shoreline within the property boundary.
- A Refuse Room.

A subdivision, rezoning and departures are required to facilitate the development as proposed.

3. Locality Plan:

Figure 1: Site (red) in the local context of Struis Baai

4. Heritage Resources Identified:

a) *Places, buildings, structures and equipment of cultural significance*: There are no structures on the site.

b) *Places in which oral traditions are attached*: Not established, considered unlikely.

c) *Historical settlements and townscapes*: The subject site does not fall within a noteworthy historic urban settlement or within a significant townscape.

d) *Landscapes and Natural Features of Cultural Significance:* Contextual significance is one of the primary heritage informants, given that the site is located on the coastal shelf and within the Coastal Protection Zone.

The environmental considerations relating to the Coastal Protection Zone will be dealt with as a component of the Basic Assessment process. However, it is to be noted that this coastline has historically been accessible to the public, the fishing community in particular (see remarks relating to the retention to public rights to fishing in the original Title Deed 495/1836, in this report).

The process of privatisation of sections of the coastline immediately above the High Water Mark has not been tracked, but it does appear that considerable sections, perhaps the majority, of the coastline of Struis Baai and L'Agulhas remain in public ownership, and are publicly accessible. Whilst this site is in private ownership, it has for all practical purposes been publicly accessible.

Access to the coast in this region is a critical public resource and contributes significantly to the "sense of place". It is indeed the historical *raison d'etre* of these two coastal villages. The coastline should, as far as possible, remain an external space (preferably open-to-the-sky), and publicly accessible.

The site currently forms part of a coastal cultural landscape which includes areas, views and component resources of **high scenic, cultural or historical significance**. Visual quality is enhanced by the intactness of the direct landscape, and lack of visual intrusions along the coastal portion of the site. Although the adjacent areas of the site are highly altered from its natural state, it is still part of a coastal landscape which has a **high degree of integrity**, particularly the portion below Marine Drive designating this a very good quality landscape. Due to its position on the coast and relation to the higher elevation of the surrounding areas the site is **particularly visible** from the surroundings areas and along the scenic route of Marine Drive and the properties along the adjacent town of Agulhas.

In the opinion of this author, the cultural landscape aspects warrant a **Grade IIIA** significance.

e) *Sites of Historical or Social significance:* The site has long been separated from the parent Paapekuilfontein Farm and has no remaining associations of historical or social significance.

f) *Geological sites of scientific and/or cultural significance:*
Two vegetation types are found in the designated study area, namely Overberg Dune Strandveld and Cape Seashore Vegetation. On a regional and national scale Overberg Dune Strandveld is considered **Endangered** and Cape Seashore Vegetation as **Least Threatened**.

Regarding the sensitivity rating for plant species, the western end of the site, where the beach is located, is more sensitive than the remainder. The site is however not typical 'dune strandveld' due to its topography, so its structure and plant species composition is somewhat less complex than in the typical form of dune strandveld. The terrestrial biodiversity rating of High to Very High by the screening tool is not supported by this study. The use by the screening tool of the Agulhas National Park buffer and the ESA1 conservation results in an overemphasis of the terrestrial biodiversity sensitivity. This sensitivity should be no more than **Medium**.

g) Palaeontological and *Archaeological Resources:*
The **palaeontological** sensitivity of the Peninsula Fm. bedrock is rated High, but the proposed small development is not expected to significantly impact the trace fossil content which might be preserved

in the folded and deformed strata beneath the surficial sands. A **Low** sensitivity may be assigned to the raised beach deposits.

The thin traces of shellfish, very few artefactual remains, and no visible cultural items such as pottery means that the **archaeological** remains have been graded as having **Low (IIIC)** local significance

h) *Graves and burial grounds*:
No burial sites are known to have been found on the site.

i) *Sites of significance relating to the history of slavery:* Although there are historical associations with an early colonial farm which would undoubtedly have utilised slave labour, this property is part of the last remaining extent of the farm post the last 2013 subdivisions. It is thus not regarded as being likely to have any direct or easily traceable associations with slavery.

j)*Moveable objects (archaeological, palaeontological, ethnographic art, fine art, military, scientific & technological & documentary): N/A*

5. Anticipated Impacts on Heritage Resources:

Palaeontology
The proposed small development is not expected to significantly impact the trace fossil content which might be preserved in the folded and deformed strata beneath the surficial sands. The possible presence of fossils in the subsurface does not have an a priori influence on the decision to proceed with the proposed development. The potential impact has a moderate influence upon the proposed project, consisting of implemented mitigation measures recommended to be followed during the Construction Phases.

Archaeology
The results of the study indicate that the proposal will likely not impact on important Stone Age archaeological heritage resources.

No archaeological mitigation is needed prior to construction excavations commencing. Archaeological monitoring of building foundations and services must be conducted by a professional archaeologist

Botanical
The specialist concludes that the proposed subdivision and development of the site would result in a High Negative direct impact that would be very difficult to mitigate. The only feasible mitigation would be through a biodiversity / conservation offset. However, the loss of habitat at the site would have a Low to Very Low Negative cumulative impact regionally because of the limited size of the site.

However, the biodiversity / conservation offset in itself is a significant challenge, since it would be difficult to find a similar habitat that could be earmarked for an offset. If a conservation offset can be secured, that would be the most suitable *quid pro quo* for loss of habitat at the site, and in that instance, the development would be supported.

General
Conformity with the heritage and visual indicators is very low. Impacts are expected to be high, negative and significant.

The coastal and scenic landscape in this gateway position is significantly at risk with insensitive density, scale and massing of buildings and location of the refuse room, holding the potential to impact significantly and negatively on the scenic experience. Given the very conceptual nature of the proposal at present, and the lack of development and landscape guidelines that are structured towards enhancing the fit and embeddedness of the number and nature of the proposed residential units, the certainty that and mitigation measures, such as landscaping and reduction in height will make an appreciable difference has not yet been proven. Under

these circumstance, it is not possible to support the proposed subdivision and rezoning of this property.

There are no identifiable sustainable socio-economic benefits that outweigh the high, negative impacts of the proposal.

6. Mitigations

Should the development proceed, proposed mitigation recommendations must be incorporated into the Environmental Management Plan (EMP) for the proposed development.

Palaeontological, archaeological and botanical mitigations are proposed. In addition it is proposed that a revised development proposal, responding to the heritage/visual indicators provided in this report, along with Development Guidelines, prepared by a suitably qualified Architect, and a Landscape Master Plan, prepared by a suitably qualified Landscape Architect, should be assessed by appropriately qualified heritage and visual impact assessors and submitted to HWC for endorsement prior to approval of the planning application.

7. Recommendations:

It is recommended that Heritage Western Cape provides Interim Comment to the following effect:

- Endorses this report as having met the requirements of Section 38(3) of the NHRA;
- In terms of Section 38(8) of the NHRA, the current proposal is not supported

Should the development proceed, the mitigation recommendations of Section 16 of this HIA must be incorporated directly and in full into the Environmental Management Plan (EMP) for the proposed development

8. Author/s and Date:

This HIA (March 2024) has been prepared by Cindy Postlethwayt. The Project Team additionally comprises, *inter alia*:

- Visual Impact Assessment: Ankia Bormans of Terra+
- Palaeontological Impact Assessment: Dr John Pether
- Archaeological Impact Assessment: Jonathan Kaplan of ACRM
- Botanical Impact Assessment: David McDonald of Bergwinds
- Town Planners: Umsiza Planning
- Environmental Impact Assessment: Michelle Naylor of Lornay Environmental Consulting

Procedures followed: The HIA follows the requirements of s38(8) of the NHRA. The draft pre-application phase HIA is to be advertised for comment and comments will be incorporated for consideration into the final pre-application phase proposals and HIA before submission to HWC for Interim Comment.

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Cindy Postlethwayt hereby declares that I have no conflicts of interest related to the work of this report. Specifically, I declare that I have no personal financial interests in the property and/or development being assessed in this report, and that I have no personal or financial connections to the relevant property owners, developers or financiers of the development. I declare that the opinions expressed in this report are my own and a true reflection of my professional expertise.

SPECIALIST DETAILS, EXPERTISE AND DECLARATION

Details of the specialist
This study has been undertaken by Cindy Postlethwayt BSoc Sci, MCRP (APHP accredited heritage practitioner), heritage consultant.

Email: cindy@cpheritage.co.za

Position On Team: Lead heritage practitioner

Abbreviated Curriculum Vitae & Declaration Annexure A

1. Property details

The property concerned, an unsubdivided (split) portion of Farm 281-RE, Struisbaai is situated on the sea side (south) of Marine Drive, opposite its intersection with Adelle Street (although this section of the street is yet to be constructed). The coastal town of Struisbaai is located in the Bredasdorp district and essentially contiguous with the coastal settlement of L'Agulhas (alt. Agulhas). The split portion of the property affected is 0.71 ha in extent but the overall landholding, from which it is proposed to be subdivided, in the first instance, is 474.8209 ha in extent, for the most part (excluding the subject portion) outside the urban edge and all zoned Agriculture. It is undeveloped, not farmed and in its natural state as part of the coastline.

Figure 1: Site (red dot) in the context of the Bredasdorp District (Cape Farm Mapper - CFM)

Figure 2: Overall landholding Farm 281-RE outlined red, the split portion, being the site, outlined solid red, in the local context of Struisbaai and L'Agulhas (CFM)

Figure 3: Site in immediate residential and shoreline context (CFM)

Figure 4: The site, a coastal property including rocky outcrops, the vegetated dune cordon, and beach. It also incorporates the high-water mark.

2. Background

A Notification of Intent to Develop (NID) for this proposal was submitted to Heritage Western Cape (HWC) in terms of the requirements of the section 38(1)*(a),(c)(i)* and *(d) of the* National Heritage Resources Act (NHRA). The HWC Response to the NID required the submission of a Heritage Impact Assessment report (HIA), with specific reference to the following:

- An Archaeological Impact Assessment (AIA)
- A Desktop Palaeontological Impact Assessment (DPIA).
- A Visual Impact Assessment (VIA).

A copy of the RNID is included in Annexure B.

3. Legal requirements

An application in terms of NEMA is triggered. This HIA is thus to be ultimately submitted for Final Comment by HWC in terms of Section 38(8) of the NHRA. The process is currently in the pre-application Basic Assessment phase.

The owner intends to subdivide the total Farm 281-RE into a Remainder of 448,71 ha (outside urban edge) and Portion A of 0,71 ha (the seafront split portion of the overall landholding and property concerned). This will be followed by an application to rezone Portion A from Agriculture to Subdivisional Area to create 5 single residential sites, one medium density residential site (for two units), street and open space.

An application in terms of the Subdivision of Agricultural Land Act 70 of 1970 is not required (Department of Agriculture consent 2004-05-26).

4. Methodology

This HIA is structured to fulfil the requirements of Section 38(3) of the NHRA and to respond to the requirements of HWC, generally in accordance with their Guidelines for NID and HIA submissions dated February 2021, and specifically in accordance with the requirements outlined in the RNID.

The registered Conservation Bodies - Whale Coast Conservation and the Agulhas Heritage Society; the Cape Agulhas Municipality and other I&APs identified through the NEMA process, will be asked to

comment on the Draft HIA. The comments will be considered for incorporation into the findings and recommendations of the HIA.

The following sources of material have been consulted:

- Historical reports and maps
- Historical aerial and map search - National Geo-Spatial Information Directorate
- Records of the Deeds Office
- Surveyor General records search
- Secondary sources (listed in references)
- On-site inspection

More specifically, the methodology has involved the following:

Study Area: In addition to site specific assessment, analysis of the overall context including the surrounding properties.

Scale of Analysis: three scales of analysis inform the assessment of significance – that of the broader landscape context; the more localised scale of Struisbaai; and the site.

Historical review: This has been limited to information listed above.

Field Survey: A site visit was undertaken to establish the physical properties of the site, natural and urban landscape and identify any patterns and features of historical and visual significance.

Policy Review: A review of relevant heritage and planning policy frameworks informs the assessment.

Specialist study: The findings of a Desktop Palaeontological Impact Assessment, an Archaeological Impact Assessment, and a Visual Impact Assessment have been integrated directly into the report.

Design Informants: Heritage and related issues are identified, and design informants proposed to guide future development. These are derived from policy frameworks, the historical and morphological analyses, and the statement of heritage significance.

The project team includes, inter alia:

- HIA Practitioner: Cindy Postlethwayt
- Visual Impact Assessment: Ankia Bormans of Terra+
- Archaeological Impact Assessment: Jonathan Kaplan of ACRM
- Palaeontological Impact Assessment: John Pether
- Environmental Impact Assessment: Michelle Naylor of Lornay Environmental Consulting
- Town Planning: Umsiza Planning

5. Assumptions and Limitations

The information and assessments supplied by others are assumed to be accurate and a fair representation of the circumstances or proposed development. It is assumed all relevant information has been or will be disclosed.

It is noted that the significance of a heritage resource is dynamic and multi-faceted, in particular as interest groups and societal values change over time. It is thus neither possible, nor appropriate to provide a definitive statement of heritage significance. Nonetheless, every effort has been made to ensure that the heritage statement is as accurate a reflection of significance as is currently possible to ascertain.

This report will not address heritage impacts beyond the site boundaries that may result from the laying of pipelines, electrical and other related infrastructure between the site and elsewhere should it be required.

Other assumptions and limitations are included in the individual specialist reports, appended to this HIA.

6. Policy Context

6.1 Heritage

There are no formal heritage surveys in this region. There are however a number of formally protected heritage resources, all at some distance from the site, including:

- On 26 February 2021, in terms of section I (xxiv)(a) of the World Heritage Convention Act, 1999 (Act No. 49 of 1999), land situated in the Western and Eastern Cape was proclaimed to be part of the Cape Floral Region Protected Areas World Heritage Site, including the Agulhas Complex which incorporates De Mond Nature Reserve, Quoin Point Nature Reserve and Soetendalsviel Nature Reserve.
- The South African National Parks, Agulhas National Park.
- Provincial Nature Reserves including Quoin Point Nature Reserve at Sandbaai, Waenhuiskrans Nature Reserve (Waenhuiskrans), De Mond Nature Reserve (Agulhas)and Soetendalsvlei Nature Reserve (Agulhas)
- Private Nature Reserves, including Renosterkop PNR, The Lagoon 2 PNR, Freshwater Sands, Andrewsfield PNR and Heunings River PNR
- PHS sites including the Cape Agulhas lighthouse, Hotagterklip in Struis Baai, a number of homesteads, including Zoetendals Vlei and numerous shipwrecks.

6.2 Planning

In terms of the approved Cape Agulhas Municipality Spatial Development Framework (CAM SDF) 2017-2022 (2017), the property is located within the Coastal Risk Area and the management actions in this regard state "Resist development within the coastal setback and associated risk areas." It is however also located within an area designated as an "Important Place of Arrival" and Marine Drive is a Scenic Route, both of which are "landscape and settlement elements to be protected" . The SDF states that consideration be given to "celebrate" the entrance to L'Agulhas (as the most southern settlement in Africa),

A final report CAM SDF 2022 – 2027 dated October 2023, has been prepared but is not yet approved. In terms of this, the site is located in an area identified as a Gateway Area, although there is no further reference to what this means. It is also within a 100m coastal hazard buffer zone and Marine Drive in the area is identified as a scenic route only on its coastal edge. For properties in the Coastal Risk Area, it states "discourage development within coastal setback lines and associated risk areas to protect and maintain the coastal corridors."

Figure 5: Final CAM SDF 2022 – 2027, not yet approved, Spatial Development Proposals site arrowed

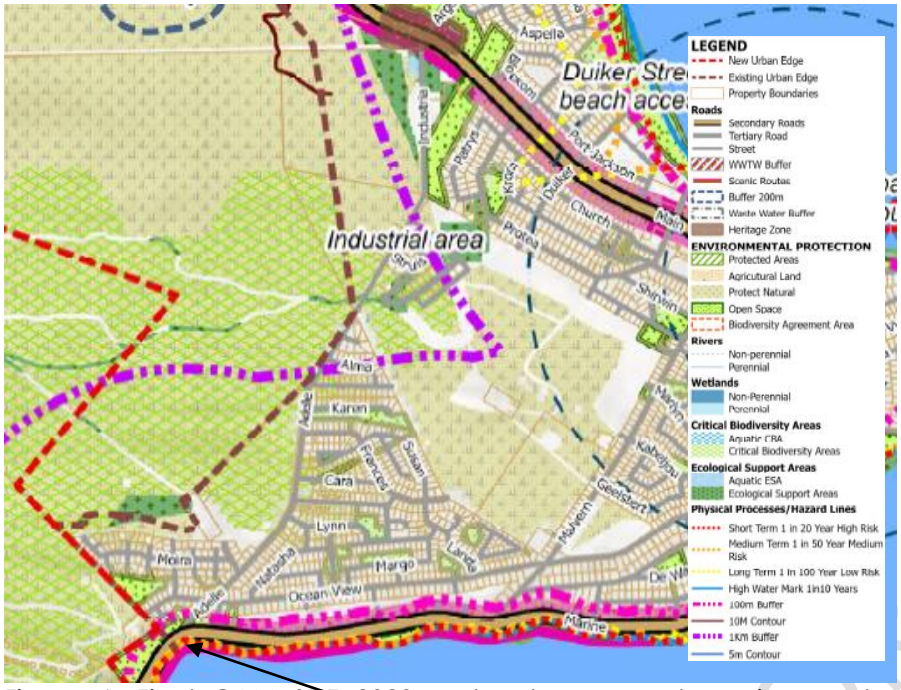


Figure 6: Final CAM SDF 2023, not yet approved, environment & heritage protection proposals, site arrowed

The site falls within the Urban Edge.

7. Palaeontology

A Palaeontological Impact Assessment prepared by John Pether is included as Annexure C.

The Bedrock

The De Hoopvlei Formation is actually a composite "formation group" The bedrock of Cape Agulhas area is the Peninsula Formation of the Table Mountain Group (TMG) which is exposed along the shoreline (Figure 5, Os). The Peninsula Fm. is of early Ordovician age (490-470 Ma) (Ma = Mega-annum – million years ago) and is mainly comprised of fluvial quartzitic sandstones and conglomerates which were deposited by numerous braiding river courses that wandered across vast alluvial plains, unrestricted by the sediment binding of vegetated banks as land plants were only just beginning to appear. Hitherto only trace fossils (burrows and tracks) have been recorded from the Peninsula Formation. This bedrock is not of palaeontological concern and is only mentioned for explanation of the geological map.

The Bredasdorp Group

Mio-Pliocene Marine Formations

The Bredasdorp Group encompasses the Cenozoic deposits (younger than 66 Ma) which overlie the eroded surfaces of the aforementioned bedrock strata which were bevelled by marine erosion during transgressions by high sea levels. The associated marine deposits preserved in the southern Cape are the shelly calcareous sands and conglomerates of the De Hoopvlei Formation. made up of marine formations of different ages which relate to periods of global warming which substantially melted polar ice and raised sea level. These are the Mid-Miocene Climatic Optimum ~16-15 Ma, the Early Pliocene Warm Period ~5-4 Ma and the Late Pliocene Warm Period ~3.0 Ma. The highest elevation marine deposits of the De Hoopvlei Fm. extend seawards from a highstand of sea level at ~110 m asl. and are of mid-Miocene age, those below ~60 m asl. are of early Pliocene age and marine deposits below ~30 m asl. are of late Pliocene age. The maximum palaeoshorelines altitudes attained are the result of a combination of the actual sea levels plus uplift of the continent.

Figure 7: Surface geology of the Struisbaai area.

Mio-Pliocene Aeolianites

Subsequent to the marine inundations a huge pile of ancient dune sand has accumulated episodically on the coastal platforms, blown inland from the ancient sandy shorelines. These variously-cemented dunes (aeolianites) are much evident in the regional landscape west of Mossel Bay as old, calcrete-capped, rounded dune ridges ("Wankoe se Rante" or "Die Harde Duine") and are particularly well displayed where erosion, road cuttings and limestone quarries reveal their internal, large-scale dune-slipface crossbedding, such as around Bredasdorp.

The older aeolianites that cover the Mio-Pliocene De Hoopvlei Formation marine deposits are consigned to the Wankoe Formation which is also a composite. The maximum ages of these old aeolianites are the ages of the marine formations that underlie them and thus the Wankoe Formation aeolianites also become younger towards the coast, with major erosion palaeosurfaces and calcrete pedocretes separating the subsidiary units of dune rock. Aeolianites correlated with the Wankoe Fm. are not mapped in the Cape Agulhas area where younger dune ridges migrated eastwards across the Cape in the form of a large headland bypass dune system.

Quaternary Sea Levels and Raised Beaches

Since the end of the Pliocene Epoch ~2.6 Ma the Earth has been in the Quaternary Period, when there was a major expansion of the polar ice caps, mainly in the Northern Hemisphere. This was the onset of more marked, repetitive Ice Ages (glacials) when the expanded ice on continents subtracted water from the oceans and sea level rose and fell repeatedly. Sea levels fluctuated at positions mainly below the present level and down as much as ~130 m bsl. during glacial maxima (Figure 6), exposing much of the continental shelves (e.g. the Agulhas Bank) and increasing the width of the coastal plains for considerable time spans.

The colder, Ice Age palaeoclimates were interrupted by brief intervals of rapid global warming, called interglacials, of which the present time is an example, when sea levels were similar to the present level or just several metres above or below present level. Figure 6 shows the sawtooth pattern of sea-level and glacial/interglacial cycles of the last 800 ka (ka = thousand years ago) and the division into numbered Marine Isotope Stages (MIS based on the oxygen isotope ratios from deep-sea shelly microfossils, which reflects the global volume of water bound up as polar ice.

The higher-lying, older raised beach occurs at 8-12 m asl. and relates to the MIS 11 interglacial high sea level that occurred around 400 ka (ka = thousand years ago). Most of the raised beach deposits that are exposed date to the Last Interglacial about 125 ka (Figure 6, LIG/MIS 5e) and are found up to ~8 m asl. due to storm deposition,

but the mean sea level was about 5-6 m asl. The youngest raised beach is 2-3 m asl. and is known as the "Holocene High". It was deposited between 7-4 ka in as the coastline was slightly uplifted in response to the loading of the oceans with polar meltwaters.

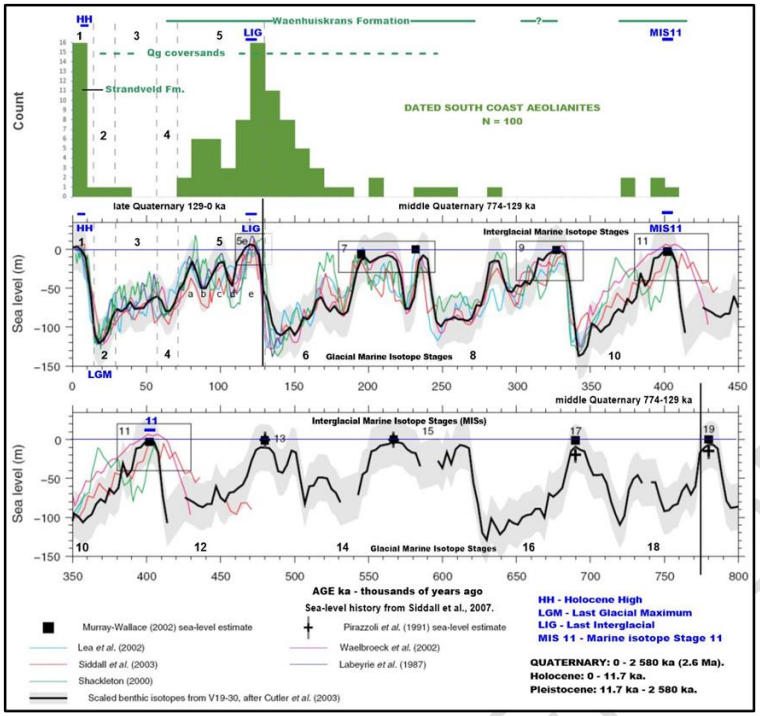


Figure 8: Sea-level history for the last 800 ka with numbered Marine Isotope Stages showing the ages of the Klein Brak Formation raised beaches and OSL dates from South Coast aeolianites.

The high sea levels penetrated inland along valleys, expanding estuaries which today have their margins fringed by older estuarine deposits. These Quaternary-age raised beaches and estuarine deposits are accommodated in the Klein Brak Formation. These high sea levels lapped onto older dunes and were later buried under younger dunes, embedding the raised beaches in notches in the coastal aeolianites.

Exposures of the Klein Brak Fm. are usually too small to be depicted at the scale of 1:250 000 geological maps. Many exposures of the Last Interglacial member of the Klein Brak Fm. occur along eroded coastal cliffs formed in the calcreted aeolianites of the Waenhuiskrans Fm., where the underlying marine exposures occur along the beach and in the intertidal zone.

Quaternary Aeolianites

During interglacial to intermediate shoreline levels dune plumes migrated onto the present-day coastal plain, sourced both from the raised beach shorelines and from now-submerged shorelines. These younger aeolianites comprise the Waenhuiskrans Formation, depicted as Qw and so named after this place near Arniston where they form the low sea cliffs at the coast (Malan, 1989). Similar to the Wankoe Fm. aeolianites there is a calcrete-capped relict dune-ridge topography and internally the formation is comprised of "packages" of dune accumulation defined by separating reddish palaeosols and calcrete pedocretes.

The 100 *OSL dates/ages obtained from the Waenhuiskrans Fm. sands are shown in Figure 6 which indicates that aeolianites accumulated mainly since the glacial MIS 6 Ice Age ~170 ka, increased as the rising sea level approached the present coastline, to peak during the Last Interglacial +6 m sea level, and then to taper off as the sea level subsequently fell to below the present level and the shorelines became more remote from the present coastline.

The calcreted dune ridge near Soetendalsvlei is exposed in a road cutting on the R319, ~6 km north of Struisbaai, and shows the typical capping calcrete, softer underlying sands with root casts (rhizoliths) and aeolian dune bedding. The sands beneath the calcrete capping produced OSL dates of ~280 to ~210 ka (Bateman *et al.*,

2004), indicating an older, mid-Quaternary age for the Waenhuiskrans Fm. at inland locations.

Figure 9: Typical aspect of the Waenhuiskrans Formation exposed in a R319 road cutting where OSL ages of ~210 to 280 ka were obtained from sand samples at 1.5 and 2 m depth, resp.

Closer to Cape Agulhas the aeolianite ridge west of the Project Area dates to ~180-160 ka and it is expected that the aeolianite exposed in the Spookdraai road cutting is of similar age. These dates indicate that the headland bypass dunes continued to be active during the low sea levels of MIS 6. Just south of the Project Area below Marine Drive is an exposure of a shelly beach deposit with boulders which underlies the Waenhuiskrans Fm. aeolianite (Malan & Viljoen, 1990) and presumably relates to the older, MIS11 high sea level.

Cliffed aeolianites at the coast near Stilbaai produced dates of ~140-90 ka (Roberts *et al.*, 2008) and at Hoë Walle west of Cape Agulhas the aeolianites overlie the LIG Klein Brak Fm. and were deposited between ~104 to ~80 ka (Carr *et al.*, 2010), *i.e.* during the later span of MIS 5.

Reworked and redistributed pale quartzitic coversands mantle much of the wider area (Figure 5, Qg), including covering much of the Waenhuiskrans Fm. and depicted as Qg/Qw. Near the coast the surficial coversands have been deposited subsequent to the LIG during the lower sea levels of the late Quaternary (Figure 6), when the "abandoned" near-coastal marine and dune sands were partly redistributed.

The latest addition of dunes to the coastal plain is the Strandveld Formation (Figure 5, Qsr). These are loose, white, mainly non-vegetated dune sands blown from the beaches in the last several thousand years, during the Holocene (Figure 6), and accumulated in the form of a narrow dune cordon or "sand wall" parallel to the coast, or transgressing several kilometres inland as dune plumes.

Affected Formations

The wave-eroded bedrock quartzites of the Peninsula Fm. underlie the proposed development. The overlying deposits are not very thick and are expected to include raised beach deposits of the Klein Brak Fm. and windblown sands of the Strandveld Fm.

Accepting that the aeolianite exposed along the Spookdraai is of MIS 6 age (~180-160 ka) and post-dates the older MIS 11 high sea level (Figure 6), the LIG high sea level (5-6 m asl.) might have occupied the bedrock beneath the Project Area, with shoreline cliffs of aeolianite. However, it is also possible that the area remained covered by the Waenhuiskrans Fm. aeolianite during LIG times, with the cliffed shoreline situated to the seaward of the Project Area, as seen at other coastal localities where the LIG raised beach deposits are absent and pre-LIG aeolianites are cliffed along the modern shoreline.

The Holocene High (~3 m asl., about 7 ka) would have impinged on the Project Area strip which very likely was inundated during storm surges, with deposition of "stormbeach" deposits above the highwater mark. Reworked marine sands of the aeolian Strandveld Fm. occupy the surface.

8. Historical background

Prior to VOC settlement of the Cape, the area south of the Langeberg and west of the Breede River was occupied by the Khoikhoin Chainouqua. Following the conclusion of the First Khoe-khoe-Dutch War, Dutch hunters and traders began to explore eastwards beyond the confines of the Hottentots Holland Mountains where "lay the spreading coastal plans grazed by the plenteous herds of the Chainouqua." [1] In doing so, they progressively dispossessed and subjugated the Khoe-khoe of what was then the Stellenbosch District, "taking possession of the land literally and symbolically. Not only did they remake the landscape with buildings, fields and all other aspects of their material culture, but they gave their own names to the hills, mountains and rivers."[2] The system of loan farms (or l*eningplaat*) after 1714 considerably intensified the expansion of European settlement.

Figure 10 Extract from a map of people living in the Cape mid 17thC (Laband: xii)

[1] Laband J: 52
[2] Ibid: 53

The site is an early-21st Century (2005) subdivision from the historical farm Paapekuilfontein 281. Paapekuilfontein was one of the earliest land grants in the region, and much of the towns of Struisbaai and L'Agulhas have been developed on portions of the farm.

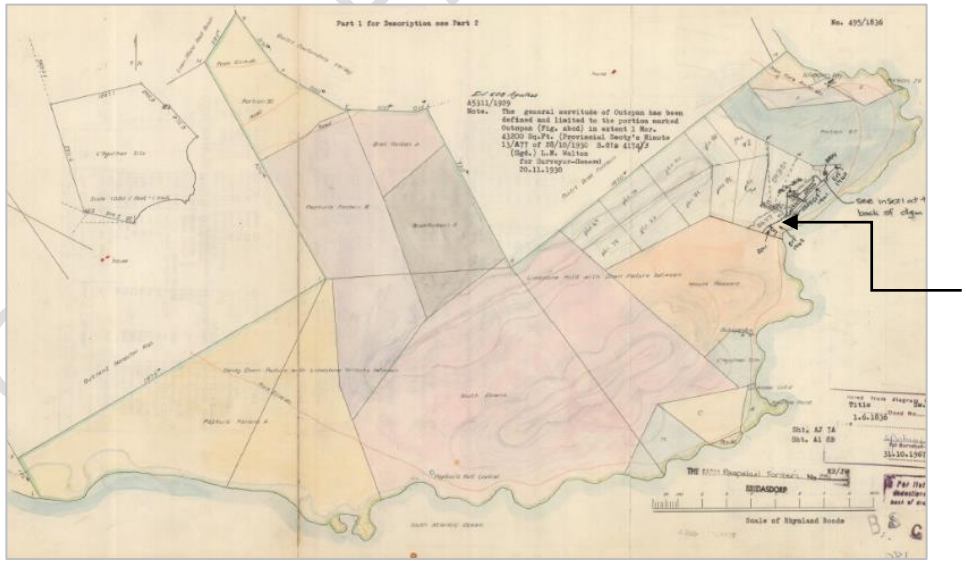
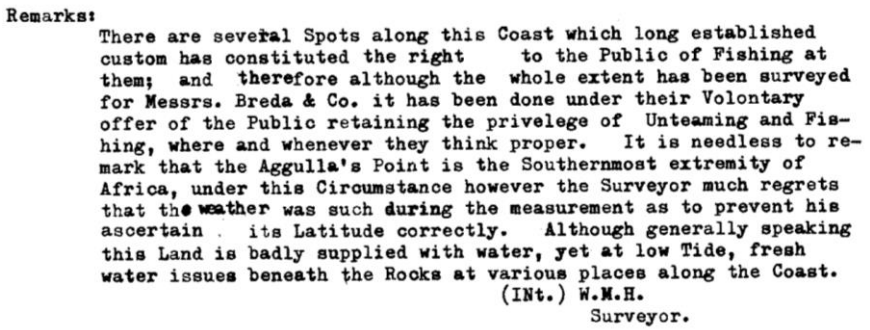


Figure 11: Paapekuilfontein Farm 281 (SG 495/1836), a loan place Swellendam Quitrent 11-20, granted in 1836 to the company Reitz, Breda and Co. Two portions of which were subdivided early on, between 1856 and 1890. Seventeen early to mid 20th subdivisions followed, twenty-one were subdivided in the late 20thC, largely the mid to late 1990s; and the process has continued in the 21stC with an additional thirteen. The property concerned forms part of the remaining extent of the farm, but has been split from the main body of Farm 281-RE by the intervening subdivisions and development.

Paapekuilfontein was transferred to Micheal Breda in 1852, upon which he embarked on an immediate process of subdivision into 4,

one portion of which was purchased (in 1852) by Barry and Nephews, another Overberg dynasty. The Breda family retained ownership of the remainder, and continued the process of subdivision, retaining ownership of the remainder and some of the subdivided portions throughout the early to mid 20thC. In 1948, the then extent of the Remainder was sold to the L'Agulhas Township Company, along with other portions (Records of the Deeds Office).

Struisbaai town is historically a traditional fishing community, confirmed in remarks relating to the retention to public rights to fishing in the original Title Deed 495/1836.



Remarks:

There are several Spots along this Coast which long established custom has constituted the right to the Public of Fishing at them; and therefore although the whole extent has been surveyed for Messrs. Breda & Co. it has been done under their Volontary offer of the Public retaining the privelege of Unteaming and Fishing, where and whenever they think proper. It is needless to remark that the Aggulla's Point is the Southernmost extremity of Africa, under this Circumstance however the Surveyor much regrets that the weather was such during the measurement as to prevent his ascertain its Latitude correctly. Although generally speaking this Land is badly supplied with water, yet at low Tide, fresh water issues beneath the Rocks at various places along the Coast.

(INt.) W.M.H.
Surveyor.

Figure 12: Remarks recorded on SG Diagram 495/1836 Farm Paapekuil Fontein 281

It is now also a popular coastal holiday destination and retirement location.

The precise trajectory of the historical origins of Struisbaai (and the close-by Cape L'Agulhas) have not been researched in detail. However, its origins in fishing is evidenced in the presence of the historical fish traps in the area. Fishing also became a way of earning a living for freed slaves[3] and disenfranchised Khoi in the Cape Colony (the Moravian mission town of Elim, established in 1824, is situated in relatively close proximity) and a leisure activity for farmers and farm workers in the area. Parker (2013) documents the significance of fishing for the local community of Struisbaai, many of whom have traced long historical roots in the area "The elders of Struisbaai could not really recall where the fishing community came from. They just remembered always being there and some recalled that their parents were either farm workers from surrounding areas like Elim, or fishermen. Elim is a Moravian Mission station, about 30 km from Struisbaai, where many freed slaves settled in the 1800's. ….

The elders also mentioned that some of them had European roots. The families Hammer, Thompson, Gabriels, Stanley, Farao and Arends were some of the first fisher families to live in Struisbaai. Oom Andrew (80) said that his great grandfather was a German from a shipwreck and that his grandmother was from Elim."[4]

Clear evidence of these historical associations is expressed in the remaining vernacular cottages of the fishing community of Hotagterklip situated along the Main road entering Struisbaai. "The date of origin of the fishing community of Hotagterklip is not known. The houses may well date from the middle of the 19th century, though the same way of building remained in use long afterwards. Three small cottages in a group west of the road were in fact built only towards the end of the (20th) century. Architecturally they form part of the larger Cape-Dutch family, having the same material and technology employed in their construction (Fransen 2006:348; Vertue 1976:53). The residents of Hotagterklip were forcibly removed under the Group Areas Act and the site declared a National Monument in 1981 (now PHS). A number of the current inhabitants of the Struisbaai Noord community were forcibly removed from Hotagterklip and other

[3] And likely escaped slaves from the shipwrecks off the coast, including the 1722 Schoonenberg and the 1776 Meermin

[4] Dennis (2009): 29

areas in the broader region, including the historical fishing community of Skipskop.

Struisbaai as it is currently laid out as a coastal resort is a mid 20thC subdivision from the farms Paapekuilfontein and Brakke Fontein. The initial Struis Bay Estate survey diagram indicates the presence of the Hotagterklip cottages and a few other dwellings, the initial fishing settlement but Hansen (2004) notes that nearly every single old cottage has since been demolished, with the exception of St Mary's Chapel, built in 1892 on a plot donated by the Van Breda's of Zoetendalsvlei. It is now a town of 'nondescript' modern holiday houses.

Tracing available historical aerials, whilst the core structure of the town was laid out by 1960, development remained sparse, gaining pace by the 1980s. By the turn of the Century, growth and development was well established and pressure for expansion has been consistent since then, development now extending north of Marine Drive above the property, and the towns of L'Agulhas and Struisbaai have effective merged at the western edge of this property.

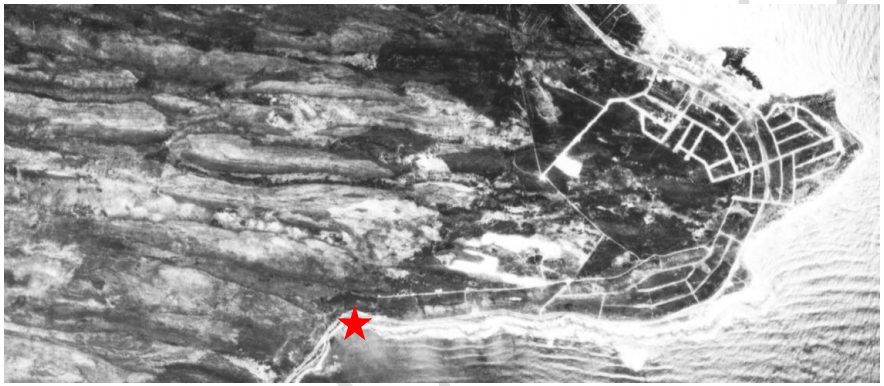


Figure 13: 1961 aerial (461_016_08825), approximate location of property concerned starred.

Figure 14: 1980 aerial (498_148_011_00349)

Figure 15: 2003 aerial (1074_C06_01195)

9. Archaeology

The Archaeological Impact Assessment (Kapan, September 2023) is appended as Annexure D and summarised as follows (without direct referencing for ease of reading):

Studies have shown that people have occupied the Agulhas region for well over a million years. Middle Stone Age (MSA) and Early Stone Age (ESA) tools occur locally, while large numbers of Later Stone Age (LSA) shell middens have been recorded in Cape Agulhas, Suiderstrand and Agulhas National Park (Hall 1984; Kaplan 1993, 1997a, b, 1998a, b, 1999a, b, 2001, 2003a, 2006, 2007; Nilssen 2004).

A search of SAHRIS[5] has shown that a handful of commercial CRM surveys have been conducted in Struisbaai. The rocky shoreline between Struisbaai and Cape Agulhas is rich in archaeological resources such as shell middens (Kaplan 2008, 1993), while few remains have been recorded north of the village, where the shoreline forms a long sandy beach. Traces of shellfish have been recorded in the back dune area near Die Plaat, and on some limestone bedrock north of the Langezandt housing development (Hart & Halkett 1995; Kaplan 2003b).

A few isolated flakes have also been recorded in Struisbaai North, and near the Caravan Park (Kaplan 2020, 2016a,b), while isolated stone flakes and some pottery was recorded inland of the coast at Andrews Air Field (Kaplan 2021). Colonial period middens associated with the historic settlement at Hotagterklip alongside as one enters Struisbaai have also been recorded (Hart & Halkett 1995).

Cape Agulhas is, probably best known for the large number of well-preserved tidal fish traps/visvywers that occur in the intertidal zone, which are visible at low tide, and on Google Earth satellite imagery. For many years archaeologists have assumed that these stone walled `dams' built in gullies or low energy bays originated among LSA hunter-gatherers who lived on the coast after 3000 years ago (Avery 1975; Goodwin 1946; Gribble 2005). But research conducted by the archaeologist Philip Hine (2008), has shown that most, if not all of these stone built fish traps, were constructed by b*ywoners* in the late 1800s and early 1900s, who rented properties from absent farmers at the time.

[5] South African Heritage Resource Agency Content Management System

10. Cultural landscape context

Inputs in this section and the next have been derived in large part from both the Botanical Scoping Assessment (Annexure E) and the Visual Impact Assessment (Annexure F), without detailed referencing for ease of reading.

At the western-most coastal edge of the rural holiday town of Struis Baai, the site is located on the seaward side (south) of Marine Drive at the point that the village of Struisbaai merges into that of L' Agulhas. It is within a semi-rural **cultural landscape** of **high** visual significance and aesthetic value, (given the degree of intactness, integrity, and legibility) with a coastal character, **outside** the urban periphery, with important components of distinctive character, valued for tangible as well as intangible attributes. As such, it is potentially susceptible to changes of the types proposed

It incorporates all of the high water mark, the 5m contour, and the low, medium and high risk coastal risk zone lines within a large area of the site. It is inside the urban edge.

Marine Drive is the main road of Struisbaai that connects it to Suiderstrand to the west and Bredasdorp inland to the north-east. It forms part of a long uninterrupted open coastal strip on the seaward side of Marine Drive, from the harbour towards L'Agulhas. It is in its natural state, with public vehicular, fishing and pedestrian access along its length, punctuated by eating and viewing facilities.

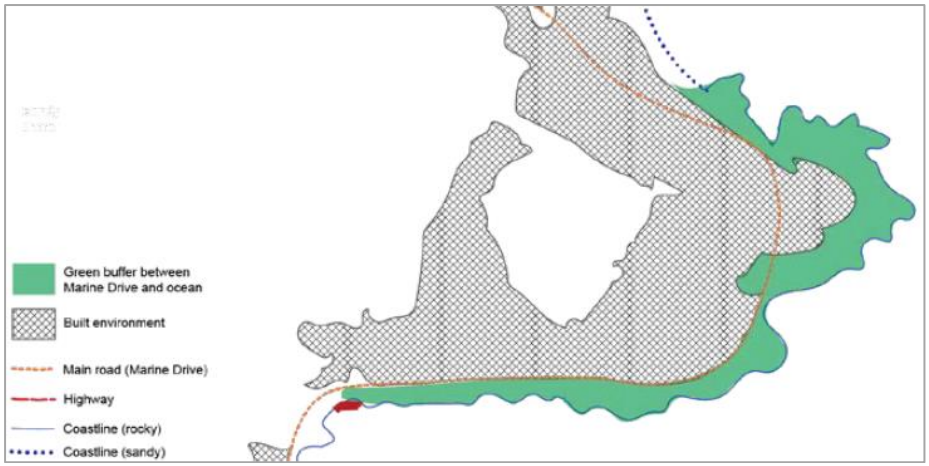


Figure 16: Diagram depicting a clear pattern of development on the landward side of Marine Drive. A generous green buffer is left open between Marine Drive and the ocean. (Terra+)

Figure 17 to 21: Travelling along Marine Drive from the promontory westwards towards the site.

Figure 22: The site right, from Marine Drive looking east.

Figure 23: From the site (boundary identified by fence in foreground, westwards towards Agulhas

Figure 24: Continuing along Marine Drive westwards towards Agulhas, the lighthouse just visible in the distance

Figure 25: From L'Agulhas looking towards Struis Baai. Even where development straddles either side of Marine Drive, this being one of those areas. , there remains a publicly accessible coastal strip on the seaward side.

Figure 26: From L'Agulhas looking towards Struis Baai, general location of the property in question identified. Even where development straddles either side of Marine Drive, this being one of those areas, there remains a publicly accessible coastal strip on the seaward side. Note the scale and openness of development.

Visual resources across the scales are summarized as follows:

Regional Context:
Bucolic rural landscape of rolling hills with typical agricultural patterns and small settlements and farmsteads.

Local context:
Coastal landscape with rural interface. Small low density towns and villages with views across the ocean and rural landscape. Direct transition from small town to coastal or rural setting. Important scenic route and gateway to the two adjoining towns

Site Attributes:
Coastal landscape with intact and indigenous vegetation. Small footpaths that lead to areas of recreation.

The primary visual resource is the coastal edge and scenic drive, of which the site forms a part.

Minimal impact could be expected to the regional context as the site is along the coastal edge. In respect of the potential for impacts upon the local context, these include a change of the nature of the scenic route and a change in views of the coastal area. In respect of the potential for impacts upon the site attributes, this includes transformation of the site from coastal zone to built up urban landscape. Visual intrusion could be expected on the foreground of the scenic experience along the route.

11. Site

11.1 Physical and botanical characteristics

In respect of the site itself, a small sandy beach occupies the western end of the proposed development site. A narrow coastal footpath runs alongside the length of the rocky shoreline, to an informal parking area at the eastern end. Several informal footpaths leading onto the site from Marine Drive have also been created, currently used by the public for access to rocky plateau above the high water mark where recreational activities take place.

The rest of the site is quite densely vegetated, with some disturbance having also taken place. A stormwater outlet is located in the north eastern corner alongside the main road, which has created visible erosion and a deep donga.

It forms part of a narrow 'strip' along the coast that has a rocky shoreline consisting of sandstone of the Table Mountain Group. Along the coastline, unsolidated dune sand of the Strandveld Formation of the Bredasdorp Group is found. The vegetation is Overberg Dune Strandveld, although there are no true dunes present. The terrain is partly a moderately sloping windswept slope consisting of deep aeolian sand above the rocky shoreline. The western part of the site has a sandy beach with the toe of the slope having a margin of Cape Seashore Vegetation with the steeper slope inland and above the beach being vegetated by strandveld. No limestone occurs on the site.

With the site being in close proximity to the gardens of houses at Struisbaai, some exotic plant species found in coastal gardens around the world but more specifically in the sub-tropics and tropics, have become established.

Part of the site is classified as Ecological Support Area 1 (ESA1), whereas the remainder of the site is not recognized as sensitive.

With reference to the mapping of threatened ecosystems, more specifically the remnants of these ecosystems that, for convenience, are referred to as 'Red List Ecosystems' (SANBI, 2022), the classification recognises only the western end of the site, where the small beach is located, as Endangered. Plant species sensitivity is Low for most of the site and Medium for the western end of the site.

Figure 27: The WCBSP map overlaid on a Google Earth Pro ™ image, indicating that the western part of the site is classified as ESA1 (Bergwind)

Figure 28: Only a small part of the site, at the western end, is recognized as endangered habitat (Bergwind)

Figure 29: Site (CFM)


Figure 30: Site (approximate boundaries), looking eastwards, right of Marine Drive, in the foreground (Terra+)

11.2 Archaeology

A field assessment of the proposed housing development site was conducted by ACRM on 07 September 2023. Identified heritage resources were recorded using a hand-held GPS unit set on the map datum WGS 84.

A few traces of archaeological heritage resources were recorded during the field study (Figure 30 and Table 1 on page 32).

Fragments of weathered marine shellfish (mostly *Turbo sarmaticus* / alikreukel & some limpet / *Scutellastra longicosta*), a flaked quartz chunk, and a limestone flake (Sites 152-182) were recorded in the coastal footpath that runs alongside the rocky shoreline (Figures 31 - 33).

Traces of shellfish (*Turbo sarmaticus*) were also recorded in a few open patches of windblown sand on the vegetated slopes above the coastal track (Sites 192, 222 & 212) (Figures 34 & 35).

A few fragments of weathered shellfish and several broken beach cobbles were recorded on the elevated rocky shelf (Site 142) at the end of the small sandy beach (Figure 36).

A few isolated fragments of shellfish were noted in the side wall of the sandy donga (refer to Figure 37), but no anthropogenic remains were noted.

No organic remains such as pottery, bone or ostrich eggshell were found.

Figure 31: Waypoints of archaeological remains and Track paths in blue


Fig 32: Site 152. View facing east


Fig 33: Site 162. View facing east.

Fig 34: Site 182. View facing east.

Fig 35: Site 222.

Figure 36: Site 212

Figure 37: Site 212.

Figure 38: Deep donga in the foreground created by the stormwater outlet. View facing southwest (Kaplan)

11.3 Visual considerations

Over and above the significance of the coastal risk zones the site is also at the cusp of the transition from Struisbaai and Agulhas. This particular point in the landscape is a natural gateway and significant in the overall experience on the scenic drive.

Crucial to the site and development is the particular placement and position relative to Marine Drive. The proposed development is the only development that will be experienced along the scenic route from the point where Marine Drive commences along the coast.

The landscape along the coast is typified by natural shrubbery, natural rock formations and clearings where there is public access to enjoy the coast as an amenity. The coastal edge is a landscape largely intact in its rugged beauty. The significance of this position is that the proposed development would be an insertion into this continuous experience of the coast.

At the **site scale**: Site is located in between Marine Drive - the main access road that connects Struisbaai, Agulhas and Suiderstrand with one another - and the ocean. Above Marine drive are a number of single residential buildings, loosely scattered across the landscape. The subject site is significant as the position is below Marine Drive where few developments take place and on a gateway position (on a scenic bend in the road) between Struisbaai and Agulhas.

Figure 398 (right): Site Context (Terra+)

The bend in the road as one approaches the site (Spookse Draai) towards Algulhas is a pivotal point in the landscape, marked with a small inlet and beach opposite a green vegetated open space on the opposite side.

The coastline is rugged and has a sense of wilderness with intact indigenous vegetation and rough eroded rocks. This a typical coastal landscape and although there are residential development the sense of place is rugged and exposed to the elements.

The site is nestled, as can be observed from the topography and contours, on the foothills of the minor hills and landforms in the landscape. This provides some protection from prevailing winter winds, but exposes the site to strong wind that buffets the coastline in summertime. There is a sense of being tucked against the slope with views to the sea and beyond. This is further emphasised by the bend in the road that leads to Agulhas. The coastline is a series of rocky outcrops, indigenous vegetation and footpath leading to accessible spaces for angling and recreation. There are one or two small sandy beaches along this portion of the coast, which intimates a sense of seclusion.

Figures 40 to 43: The site with steep hill starting to slope right behind Marine Drive (contours at 5m intervals) (Terra+)

Figure 44: Local landscape patterns (Terra+)

Figure 45: Vegetation & landscape patterns (Terra+)

The urban pattern surrounding the site is residential with 2 to 3 storey dwellings all predominantly facing the sea. There is a clear pattern of residential developments placed on the north side of Marine Drive, far side from ocean, leaving a green buffer between ocean and road.

Figure 46: Settlement Patterns: large green buffer between building and ocean (Terra+)

The Landscape Character is considered highly sensitive to visual impact as it is associated with areas of high visual / scenic amenity. Smaller footpaths extend along the coastal edge, and connect to a network of footpaths in the green open space to other spaces and public amenities.

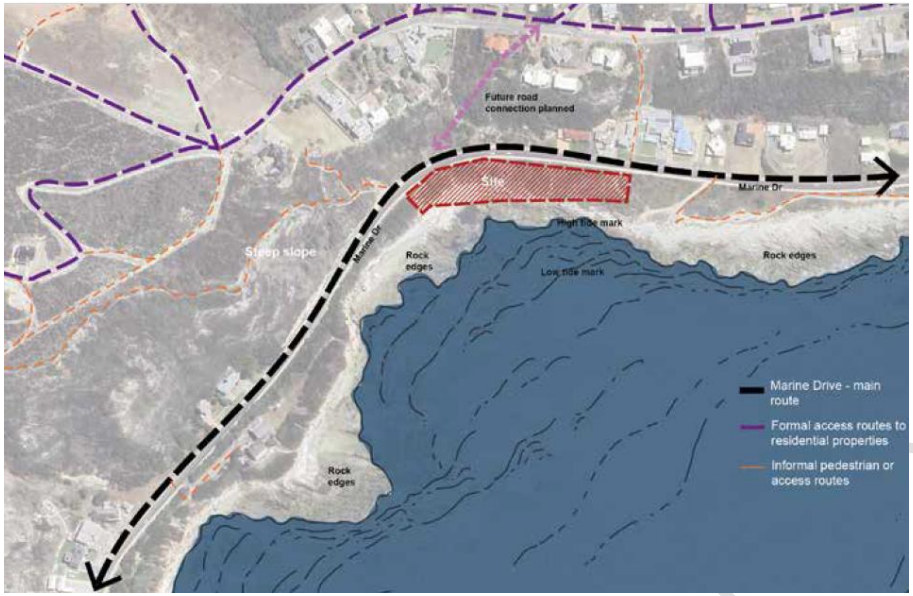


Figure 47: Connectivity and access (Terra+)

12 Heritage Resources & significance

Establishing and grading for heritage significance is based on the three-tier grading system used in the NHRA and HWC's "Grading Implications & Management of HR HWC guidelines April 2016" (Annexure F).

a) *Places, buildings, structures and equipment of cultural significance*: There are no structures on the site.

b) *Places in which oral traditions are attached*: Not established, considered unlikely.

c) *Historical settlements and townscapes*: The subject site does not fall within a noteworthy historic urban settlement or within a significant townscape.

d) *Landscapes and Natural Features of Cultural Significance:* Contextual significance is one of the primary heritage informants, given that the site is located on the coastal shelf and within the Coastal Protection Zone.

The environmental considerations relating to the Coastal Protection Zone will be dealt with as a component of the Basic Assessment process. However, it is to be noted that this coastline has historically been accessible to the public, the fishing community in particular (see remarks relating to the retention to public rights to fishing in the original Title Deed 495/1836, page 17 in this report).

The process of privatisation of sections of the coastline immediately above the High Water Mark has not been tracked, but it does appear that considerable sections, perhaps the majority, of the coastline of Struis Baai and LÁgulhas remain in public ownership, and are publicly accessible. Whilst this site is in private ownership, it has for all practical purposes been publicly accessible.

Access to the coast in this region is a critical public resource and contributes significantly to the "sense of place" . It is indeed the historical *raison d'etre* of these two coastal villages. The coastline should, as far as possible, remain an external space (preferably open-to-the-sky), and publicly accessible.

The site currently forms part of a coastal cultural landscape which includes areas, views and component resources of **high scenic,**

cultural or historical significance. Visual quality is enhanced by the intactness of the direct landscape, and lack of visual intrusions along the coastal portion of the site. Although the adjacent area of the site is highly altered from its natural state, it is still part of a coastal landscape which has a **high degree of integrity**, particularly the portion below Marine Drive designating this a very good quality landscape. Due to its position on the coast and relation to the higher elevation of the surrounding areas the site is **particularly visible** from the surroundings areas and along the scenic route of Marine Drive and the properties along the adjacent town of Agulhas.

The view catchment area is relatively small with views limited to the direct surroundings and a portion of the scenic route of Marine Drive and Agulhas, however these views are significant due to the particular quality and intact nature of the coastal landscape.

Figure 48: Site viewshed (Terra+)

In the opinion of this author, the cultural landscape aspects warrant a **Grade IIIA** significance.

e) *Sites of Historical or Social significance:* The site has long been separated from the parent Paapekuilfontein Farm and has no remaining associations of historical or social significance.

f) *Geological sites of scientific and/or cultural significance:*
Two vegetation types are found in the designated study area, namely Overberg Dune Strandveld and Cape Seashore Vegetation. On a regional and national scale Overberg Dune Strandveld is considered **Endangered** and Cape Seashore Vegetation as **Least Threatened**.

Regarding the sensitivity rating for plant species, the western end of the site, where the beach is located, is more sensitive than the remainder. The site is however not typical 'dune strandveld' due to its topography, so its structure and plant species composition is somewhat less complex than in the typical form of dune strandveld. The terrestrial biodiversity rating of High to Very High by the screening tool is not supported by this study. The use by the screening tool of the Agulhas National Park buffer and the ESA1 conservation results in an overemphasis of the terrestrial biodiversity sensitivity. This sensitivity should be no more than **Medium**.

g) Palaeontological and *Archaeological Resources:*
The **palaeontological** sensitivity of the Peninsula Fm. bedrock is rated **High**, but the proposed small development is not expected to significantly impact the trace fossil content which might be preserved in the folded and deformed strata beneath the surficial sands.

The Klein Brak Fm. raised beach deposits typically consist of shelly sands and rounded gravels. In open-coast settings these Quaternary "raised beach" deposits include a fossil shell fauna which is mainly comprised of extant (living) species which are common today and which are not palaeontologically sensitive. In addition to fossil shells, scattered fossil bones such as from whales, dolphins, seals and seabirds may occur in the deposits, but are generally very rare. These are not likely to be extinct species, but species beyond their modern-

day ranges may occur. A **Low** sensitivity may be assigned to the raised beach deposits. The thin traces of shellfish, very few artefactual remains, and no visible cultural items such as pottery means that the **archaeological** remains have been graded as having **Low (IIIC)** local significance

h) *Graves and burial grounds*:
No burial sites are known to have been found on the site.

ii) *Sites of significance relating to the history of slavery:* Although there are historical associations with an early colonial farm which would undoubtedly have utilised slave labour, this property is part of the last remaining extent of the farm post the last 2013 subdivisions. It is thus not regarded as being likely to have any direct or easily traceable associations with slavery.

j)*Moveable objects (archaeological, palaeontological, ethnographic art, fine art, military, scientific & technological & documentary): N/A*

GPS Point	Name of Farm	Lat/long	Description of finds	Grading	Mitigation
	Farm 281 – Re seafront				
142		S34° 48.819' E20° 01.841'	A few weathered fragments of shellfish & several broken cobbles and chunks on rock ledge	IIIC	None required
152		S34° 48.823' E20° 01.869'	Traces of weathered shellfish alongside coastal foot path	IIIC	None required
162		S34° 48.823' E20° 01.875'	Traces of weathered shellfish, + flaked quartz chunk alongside coastal footpath	IIIC	None required
172		S34° 48.824' E20° 01.881'	Traces of weathered shellfish on sandy slope	IIIC	None required
182		S34° 48.826' E20° 01.883'	A few fragments of shellfish + limestone flake alongside coastal footpath	IIIC	None required
192		S34° 48.820' E20° 01.909'	A few fragments of weathered shellfish on sandy slope	IIIC	None required
222		S34° 48.823' E20° 01.938'	A few fragments of weathered shellfish on eroded sandy slope	IIIC	None required
212		S34° 48.830' E20° 01.958'	Fragments of shellfish on patch of sand outside footprint area	IIIC	None required

Table 1: Spreadsheet of waypoints and description of archaeological resources

Figure 49: Conceptual diagram of proposed grading, site and surrounds.

13 Heritage informants and design indicators

This report acknowledges the reality that this coastal site is, relatively unusually, is in private ownership and within the urban edge. There is therefore a legitimate expectation of development rights, although these are, for historical reasons, limited by the zoning of Agriculture.

Nonetheless, the property is located within a highly sensitive landscape: as part of the Coastal Protection Zone; on a scenic route; and with significant contextual significance in so far as it retains its open and natural qualities along the coastline.

On the basis of the identification of aspects of significance, heritage informants relate essentially to issues of public access and visual considerations. Whilst the location of the property within the Coastal Risk Area is highly significant, this matter is more appropriately addressed in the NEMA Basic Assessment report.

- *Public Access*: It is relevant to note:
  - the historical association of this region with, for many years, largely unfettered access to the coastline, for fishing in particular;
  - the reference in the original SG Diagram to a "*voluntary offer of the public retaining the privilege of unteaming and fishing, where and whenever they think proper*";
  - the likelihood that users of the coastline have presumed this property and its beach to form part of the publicly accessible coastline;
  - and to the legal presumption of public right of way below the high water mark.

  It is therefore considered appropriate to maintain a reasonable public right of access to the beach and area below the Coastal Risk Zone (presumed undevelopable) from at least 2 points, as well as pedestrian access along Marine Drive.

  This is further confirmed in the recommendations of the VIA[6] relating to the maintenance of the access to the beach and footpath which are currently along the coastline and an amenity to the public.

- *Visual Corridors and Green Connections:* Create green continuous corridors between units to ensure ample visual connection with the ocean from Marine Drive and the existing development adjacent to the site. These must be generous and allow for unobstructed views.

- *Maintain a green buffer*: Maintain a generous green edge of indigenous vegetation with no trees or exotic and manicured gardens. The buffer to be a minimum of 2m to allow the natural occurring shrubs to grow.

[6] *Note: visual and landscape indicators and diagrams are not actual designs but diagrams of concepts and ideas to be considered and adopted to ensure visual amelioration and mitigation*

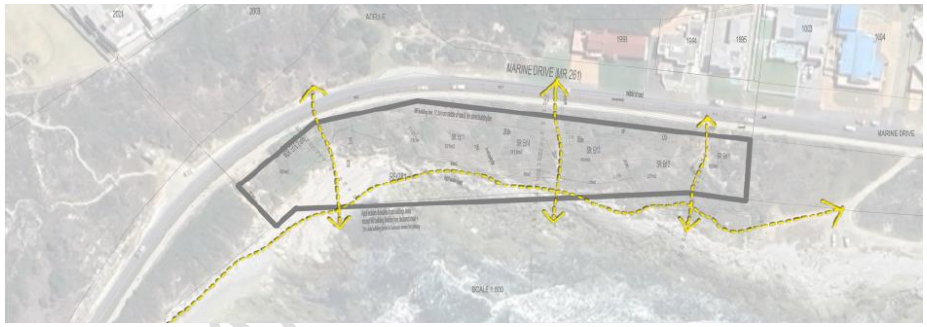


Figure 50: maintenance of physical, publicly accessible links (Terra+)

Figure 51: Green Connections and Visual Corridors (Terra+)

Figure 52: maintain a green buffer (Terra+)

- *Suitable Architectural Typology*: The architecture can be one of two typologies. The first a modest beach bungalow type architecture tucked in the landscape with typical pitched roofs and single storey in natural materials and finishes. A modern interpretation of this is feasible and will be possible on the site.

  The alternative (which is expressed in the renders supplied) is a modern rendition of a dwelling. Should this be the route then the roof-scape and heights must be restricted as is illustrated in the sketch over the render supplied. Where possible the roofs must be vegetated "green roofs". The roof-scape must be interrupted to avoid continuous heights perceived from Marine Drive and surrounding areas.

  Avoid continuous structures that may have a cumulative effect of a "solid" wall architecture.

  All boundary walls must be permeable to allow vegetation and greenery to continue through the fencing. There should be no fencing along the sea edge of the property.

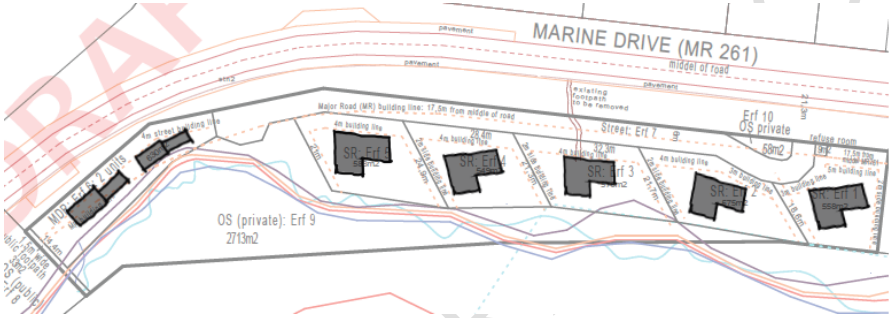


Figure 53: Modest bungalow type footprints, approx. 150m2 in overall cover, Note these are indicative diagrams only and not designs (Terra+)

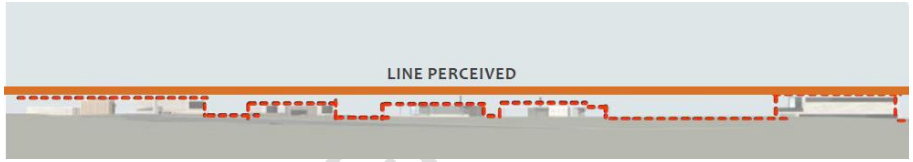


Figure 54: Continuous height Roof-scape - perceived as a continuous line in the skyline (Terra+)

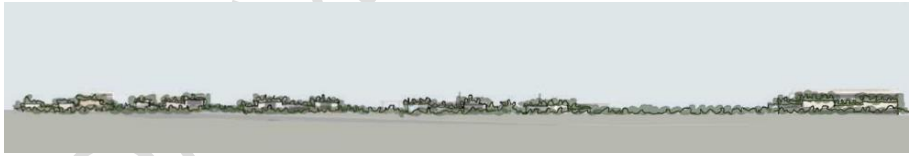


Figure 55: Reduced roof-scape and interrupted line (Terra+)

Figure 56: Perceived line is interrupted and non-monolithic (Terra+)

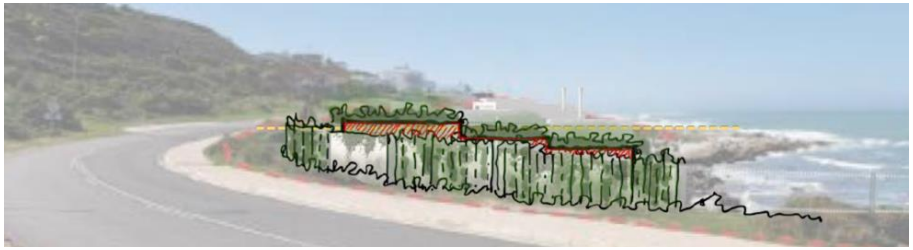


Figure 57: Reduce the roof height and maintain permeable boundary conditions (Terra+)

14 Development Proposal

The concept proposal included in full in Annexure H.

Both development alternatives include the subdivision of the site into residential opportunities with access provision. It is not a limited access estate and as such, only the general provisions of the zoning scheme are applicable to height, coverage, massing etc.

Alternative 1 (not preferred)
Alternative 1 proposes 7 residential erven, with a parallel private road access alongside Marine Drive and an open space erf below the High Water Mark.

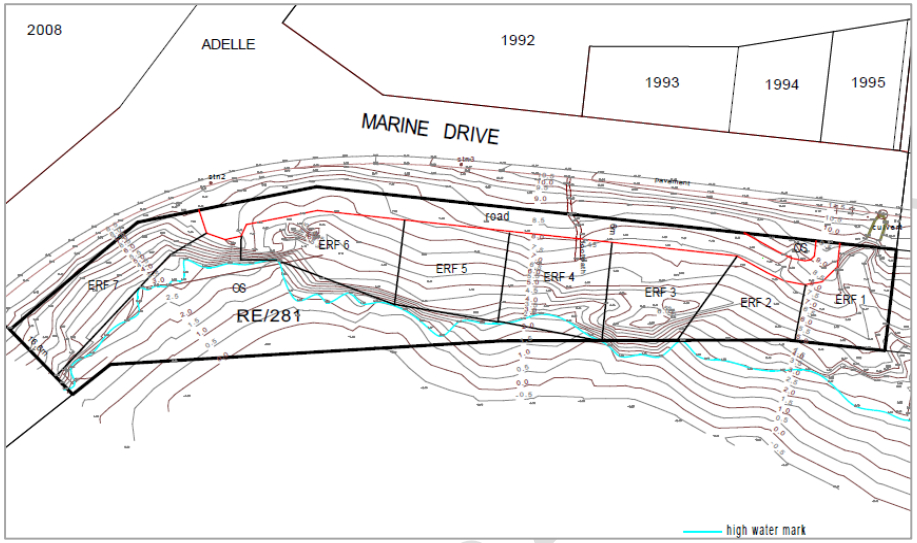


Figure 58: Alternative 1 subdivision plan, not preferred.

It has however been discarded for the following reasons:
- the density was considered too high with a larger consequential impact;
- There was no provision for coastal access
- Only the high water mark was taken into account
- Open Space was limited.
- Erven 1 to 3 along southern boundary of erf were too closer to the ocean
- Orientation of the erven for views and wind shield was poor.

Alternative 2 (preferred) is a variant of the Alternative 1 layout.

The layout takes into consideration the 5m contour line; the High Water Mark; and the High, Medium and Low Risk Coastal Zones.

It includes:
- Five Single Residential Erven of between 549 and 588m^2;
- One Medium Density Residential Erf of 630m^2 intended for two dwellings;
- A parallel private road access alongside Marine Drive;
- A 1.5m wide public footpath along the western boundary, providing access to the beach below the High Water Mark.
- A Private Open Space of 2,713m^2 comprising the beach and some of the rocky shoreline within the property boundary.
- A Refuse Room.

The development of the erven will be prescribed only by the Zoning Scheme (ie there are no development guidelines), along with:
- A departure from the 2m building lines (to zero) proposed for the 5 single residential erven, along the seaward boundary;
- A departure for a refuse room in the street building line;
- Departures from the Main Road building line to a 4m street building line.

Single Residential development parameters include, *inter alia*:

- Allowance for a dwelling units and a second dwelling unit and their use for overnight transient accommodation, with Consent Use for guest accommodation and a double dwelling house.
- 50% coverage.
- Height 8.5m from the highest point of the natural ground level, provided that if the building is situated on a slope, it may at no point exceed 10m when measured from the natural ground level to that point.
- 2m lateral building lines for residences; for garages and storage buildings, 1.5m from lateral and rear boundaries.

Medium Density Residential development parameters include, *inter alia*:

- Allowance for group housing, retirement and townhouse schemes with Consent Use for a Double Dwelling House and Flat.
- A maximum of 40 dwelling units per hectare
- Height 8m from the highest point of the natural ground level, provided that if the building is situated on a slope, it may at no point exceed 10m when measured from the natural ground level to that point.
- 0m from lateral and rear boundaries.
- 0m set back from the internal street boundary and 4 m set back from an external street boundary provided that 2 parking areas are provided on the site.
- A minimum outdoor living area of 25m_2 or 25% of the floor area of the dwelling unit, whichever is the greatest, shall be provided on the erf containing the dwelling unit, and a minimum of 50m_2 per dwelling unit shall be provided as public or communal open space within the medium density housing site.

<u>Alternative 3: No Go</u>
Alternative 3 presumes the status quo remains.

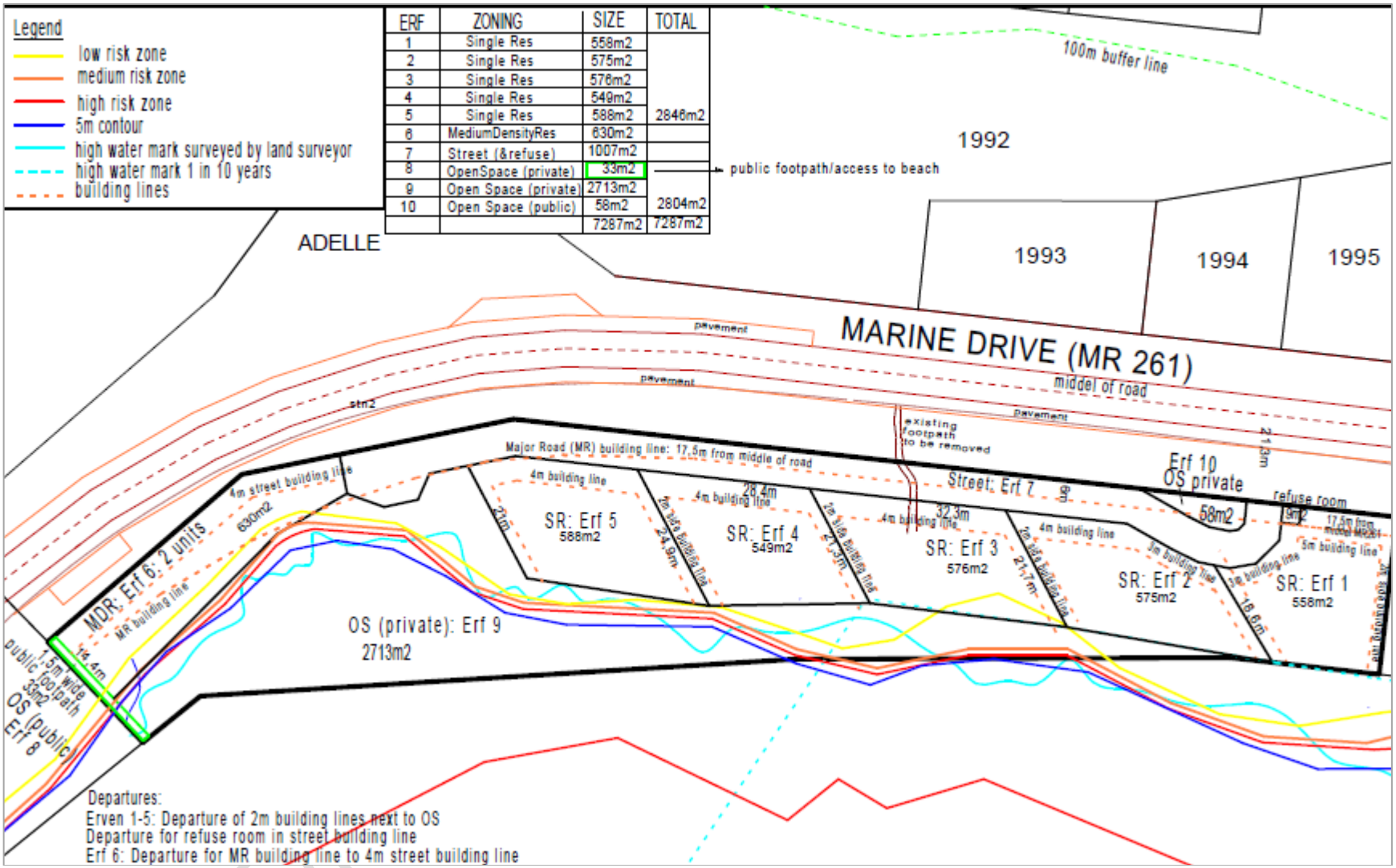


Figure 59: Alternative 2: Preferred subdivision layout, coverage and setbacks.

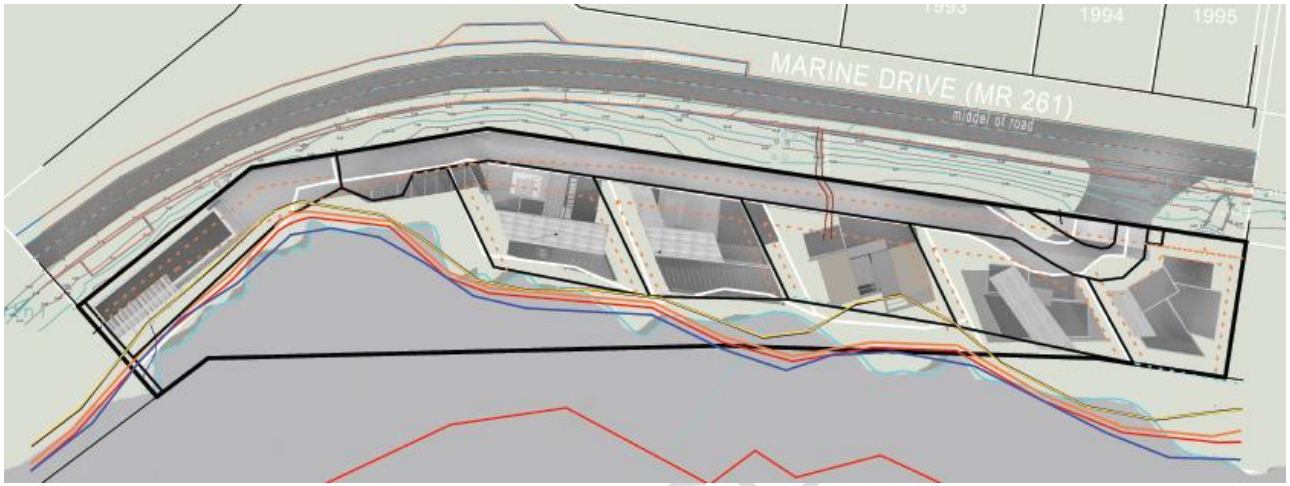


Figure 60: Possible development footprint based on planning parameters


Figure 61: Conceptual render

Figure 62: Conceptual render

Figure 63: Conceptual render

Figure 64: concept elevation from ocean side

Figure 65: concept elevation from street

Figure 66: concept render from Marine Drive looking east

Figure 67: Conceptual render looking across the site from its easternmost boundary

15 Heritage Impact Assessment

15.1 Assessment of alternatives

In principle, it is accepted that development can be considered provided it is finely tuned and responsive to the range of sensitivities of the site. It is acknowledged that the property is, in legal and technical terms, privately owned, while simultaneously has historically provided for unrestricted public access to the beach, waters' edge and coastal terrace, as well as uninterrupted visual continuity of the coastline from the scenic Marine Drive. In so far as is possible and reasonable, the preservation and enhancement of this quality in its context are seen as key to maintaining the accessibility and character of the coastline.

Palaeontology (all alternatives)

The possible presence of fossils in the subsurface does not have an a priori influence on the decision to proceed with the proposed development. The potential impact has a moderate influence upon the proposed project, consisting of implemented mitigation measures recommended in Section 16, to be followed during the Construction Phases.

Archaeology (all alternatives)

The results of the study indicate that, a small housing development on this property will likely not impact on important Stone Age archaeological heritage resources.

Therefore, there are no objections, on archaeological grounds, to the development proceeding subject to the mitigation measures recommended in Section 16 of this HIA Report.

Botanical (all alternatives)

The specialist concludes that the proposed subdivision and development of the site would result in a **High Negative direct** impact that would be very difficult to mitigate. The only feasible mitigation would be a conservation offset. However, the loss of habitat at the site would have a **Low to Very Low Negative cumulative** impact regionally because of the limited size of the site.

Impact Preferred Alternative 2

Public access

The proposed development incorporates a 1.5m wide public footpath along the western boundary, providing access to the beach below the High Water Mark. It is however unclear whether the majority of the beach, which falls into subdivision 9 (Private Open Space) will be public (the zoning would suggest otherwise).

The indicator suggesting the maintenance of a number of physical, publicly accessible links across the site and along the coastline has been given minimal acknowledgment.

Conformity with indicators: Low

Visual Corridors and Green Connections:

The planning parameters provided for only 2m lateral building lines for residences; and for garages and storage buildings, 1.5m from lateral and rear boundaries. This provides no appreciable opportunity to ensure continuous corridors between units to ensure substantive and generous visual connection with the ocean from Marine Drive

Conformity with indicators: Low

Maintenance of a green buffer: Without a Landscape Master Plan, it can be assumed there is none provided nor will it be required in terms of the planning parameters. The location of a service road to provide access to the properties, accessed via a central point, with a refuse room, and no restriction on boundary walling will compound this omission.

Conformity with indicators: Low

Suitable Architectural Typology:
There are no development or architectural guidelines, and thus no ability to control the architectural expression of the zoning parameters on any of these sites.

The alternative of a modest beach bungalow type architecture tucked in the landscape with typical pitched roofs and single storey in natural materials and finishes has not been selected to illustrate the proposal, but is a fitting precedent.

Figure 68: Existing precedent looking from Agulhas towards the site (note not only the appropriate scale of architecture, but also no perimeter fencing, and visually continuous green spaces through and down to the coast).

It has been acknowledged that a contemporary interpretation is feasible and possible. However, without architectural guidelines to establish more appropriate parameters, the roof-scape, massing and heights are not restricted. The visually continuous structures that are possible to achieve with the zoning parameters may have a cumulative effect of a "solid" wall architecture.

It is likely that with guidelines that respond more directly to the indicators, and no permissible departures, the density of development permissible in terms of the preferred alternative would not be possible to achieve.

Conformity with indicators: Low

In overall terms, the heritage (and related visual) impacts are expected to be **High, negative**. There is limited information available to assess the significance of the impact of the preferred alternative, however, should the landscape and visual indicators be followed and applied then the significance of the impact may be lowered.

VISUAL SENSITIVITY OF AREA (LANDSCAPE SENSITIVITY)
The portion of the field-of-view dominated by the proposal decreases substantially at distances beyond 1km from the site, as the proposal becomes screened by existing landforms and vegetation. However the typical landscape quality and the intrusion into this unique setting creates a visual sensitivity that is deemed to have a **Medium to High Visual Sensitivity.**

VISUAL SENSITIVITY OF RECEPTORS
The Receptors of the anticipated visual impact include residential areas which are considered to have **High Visual Sensitivity**. The site falls within proposed (as yet approved) urban edge, but interfaces with a coastal cultural landscape with high visual / scenic amenity value.

SIGNIFICANCE OF SENSITIVITY TO VISUAL CHANGE
As a function of landscape sensitivity and anticipated magnitude of change as a result of the development, above, the sensitivity to visual change is deemed to be of **High Significance.**

VISUAL INTRUSION OF DEVELOPMENT (MAGNITUDE OF VISUAL CHANGE)
The development is proposed to occupy a portion of the coastline which is pristine and with no adjacent development to form a

continuous pattern. This urban intrusion will result in a **High Visual Intrusion**

VISUAL ABSORPTION CAPACITY OF SITE
The particular landscape quality of the site and the fact that there are no adjacent development along this portion of the coast results in a **Low Visual Absorption Capacity.**

SIGNIFICANCE OF ANTICIPATED VISUAL IMPACTS
Determined through a synthesis of the aspects of nature, duration, intensity, extent and probability, the Construction Phase Visual Impact is of **Medium adverse** significance; however this may be ameliorated through the implementation of an environmental management plan as mitigation.

Determined through a synthesis of the aspects of the nature, duration, intensity, extent and probability, the Operational Phase Visual Impact is of **High Negative** Significance, having a significant influence on the environment, and requiring mitigation.

As a function of receptor sensitivity and anticipated magnitude of change as a result of the development, above, the sensitivity to visual change is deemed to be of **Major Significance, negative.**

Due to the lack of architectural and landscape parameters and the lack of a landscape plan and mitigation measures, the proposed development will have a **Significantly High Negative Visual Impact** and cannot be supported.

There is limited information available to assess the significance of the impact, however should the combined heritage indicators be followed and applied then the significance of the impact may be lowered.

Impact Alternative 1
The potential impacts of Alternative 1 are likely to be similar to that of the preferred alternative (perhaps marginally higher), although it will likely have greater environmental impacts given that the High, Medium and Low Risk Coastal Zones were not taken into account

Impact Alternative 3 No Go
The 'do nothing' scenario will be the best outcome with reference to the combined heritage/visual sensitivities. Although it does not acknowledge the rights of the private owner, a rezoning (the current zoning of Agriculture is clearly an historical consequence and could be reasonably amended) with development guidelines could provide the opportunity for far fewer but more appropriate residential development opportunities that could meet the heritage related indicators provided in this report.

Impact assessment tables are included in the individual Impact Assessment Reports linked to this HIA.

15.2 Cumulative Impacts
These are unlikely given the rare incidence of privately owned land on the shoreline.

15.3 *Sustainable Socio-economic benefits*
There are no identifiable sustainable socio-economic benefits that outweigh the high, negative impacts of the proposal.

15.4 Summary
The coastal and scenic landscape in this gateway position is significantly at risk with insensitive density, scale and massing of buildings and location of infrastructure (the refuse room), holding the potential to impact significantly and negatively on the scenic experience. Given the very conceptual nature of the proposal at present, and the lack of development/architectural and landscape guidelines that are structured towards enhancing the fit and

embeddedness of the number and nature of the proposed residential units, the certainty that any mitigation measures, such as landscaping and reduction in height will make an appreciable difference has not yet been proven. Under these circumstance, it is not possible to support the proposed subdivision and rezoning of this property.

16 Mitigation

Should the development proceed, the following recommendations must be incorporated into the Environmental Management Plan (EMP) for the proposed development.

Palaeontology
Although the inspection of construction excavations may be specified in the Archaeological Impact Assessment, it is not feasible for a specialist monitor to be continuously present during the Construction Phases, when fossil bones may be unearthed at any time. The rescue of fossil bones during earth works critically depends on spotting this material as it is uncovered during digging. For successful mitigation, it is therefore crucial that earth works personnel must be involved in mitigation by watching for fossil bones as excavations are being made. It is recommended that a protocol for finds of buried fossil bones, the Fossil Finds Procedure (FFP) (Appendix 2), is included in the Environmental Management Plan (EMP) for the proposed development.

The field supervisor/foreman and workers involved in excavations must be informed of the need to watch for fossil bones and archaeological material. Workers seeing potential objects are to cease work at that spot and to report to the works supervisor who, in turn, will report to the Environmental Control Officer (ECO) and/or the Developer. The ECO/Developer will contact and liaise with Heritage Western Cape and the standby archaeologist or palaeontologist on the nature of the find and suitable consequent actions such as immediate site inspection, application for a palaeontological collection permit and drafting of a work plan for the collection of the find.

A permit from HWC is required to excavate fossil bone finds. The applicant should be the qualified specialist responsible for assessment, collection and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit with supporting work plan will immediately be made to HWC. The application requires the details and permission of the registered owner of the site. The fossils and their contextual information must be deposited at a SAHRA/HWC-approved institution. The rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

Archaeology

1. No archaeological mitigation is needed prior to construction excavations commencing.
2. Archaeological monitoring of building foundations and services (e. g. water, electricity, sewerage, stormwater) must be conducted by a professional archaeologist.
3. If any unmarked human remains are uncovered or exposed during excavations, work must stop, and the finds reported to the Environmental Control Officer and the contracted archaeologist (Jonathan Kaplan 082 321 0172). Human remains must not be removed or disturbed until inspected by the archaeologist.

Botanical
It would not be possible to mitigate for the negative impacts on the site itself. The only way that mitigation could be implemented would be through a biodiversity / conservation offset. However, that in itself is a significant challenge, since it would be difficult to find a similar habitat that could be earmarked for an offset.

If a conservation offset can be secured, that would be the most suitable *quid pro quo* for loss of habitat at the site, and in that instance, the development would be supported.

General
A revised development proposal responding to the heritage/visual indicators provided in this report, along with Development Guidelines, prepared by a suitably qualified Architect, and a Landscape Master Plan, prepared by a suitably qualified Landscape Architect, should be assessed by appropriately qualified heritage and visual impact assessors and submitted to HWC for endorsement prior to approval of the planning application.

17 Public Comment

The registered Conservation Bodies in the area include the Agulhas Heritage Society and Conservation Body and Whale Coast Conservation. The Cape Agulhas Municipality, and other I&APs identified through the NEMA process, have been asked to comment on the Draft HIA. The comments will be considered for incorporation into the findings and recommendations of the HIA.

Proof of advertising and comments received are included in full in Annexure I and are summarised as follows:
…

(to be completed after the public participation process has concluded)

18 Recommendations

It is recommended that Heritage Western Cape provides interim Comment to the following effect:

- Endorses this report as having met the requirements of Section 38(3) of the NHRA;
- In terms of Section 38(8) of the NHRA, the current proposal is not supported
- Should the development proceed, the mitigation recommendations of Section 16 of this HIA must be incorporated directly and in full into the Environmental Management Plan (EMP) for the proposed development.

References

Agulhas Park ebulletin April 2011, Volume 13
https://www.sanparks.org/assets/docs/parks-agulhas/april.pdf

Burrows E.H. (1988) Overberg Outspan A Chronicle of people and places in the South Western Districts of the Cape

Burrows E.H. (1994) Overberg Odyssey: People, roads and early days.

www.csggis.drdlr.gov.za

Dennis T.L (2009): Perceptions of History and Policy in the Cape Agulhas Area: could History influence Policy on Small-Scale Fishing?

Laband J (2020):The Land Wars: The dispossession of the Khoisan and AmaXhosa in the Cape Colony

Parker K (2013: Livelihoods of Small-scale Fishers of Struisbaai: Implications for Marine Protected Area Planning

South African National Parks (Oct 2006): Agulhas National Park: Park Management Plan

Van der Hoven L (2001): Elim: A cultural historical study of a Moravian Mission Station at the southern extreme of Africa

Vidememoria (2016): Phase 2 HIA Struisbaai Erf 857

ANNEXURE A: Specialist details and declaration

Company Name	Cindy Postlethwayt
Resource Description	Heritage practitioner
Professional Qualification	B Soc Sci; MCRP
Years Experience	16 years heritage
Professional Registrations	APHP
B-BBEE status	Exempt Micro-enterprise (Level 5 ito amended Construction Sector Code)

Key Experience / Training	Cindy Postlethwayt is a qualified Town and Regional Planner and APHP Accredited Professional Heritage Practitioner. She has 36 years experience, with a specialist focus over the last 15 years in heritage work. She worked at the City of Cape Town for 13 years, 11 of which in a management capacity, covering the fields of development management; spatial and transport planning, strategic planning and the Olympics. She has been an independent consultant for 23 years, with a broad range of applications. Her client list has included local, provincial and national governments, para-statals, community based organisations and private sector investors.

TABLE OF RELEVANT WORK EXPERIENCE:

Chairperson: Heritage Western Cape Impact Assessment Committee (IACom) Dec 2014 to Nov 2016

Committee Member: Heritage Western Cape Impact Assessment Committee (IACom) 2013 – Dec 2014

Heritage Impact Assessments: Lead heritage practitioner, approximately 73 major HIAs

Section 27 and 34 applications: Lead heritage practitioner, approximately 45

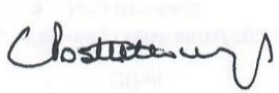
NID applications and heritage statements (stand alone, not part of an HIA): Approximately 90

Appeals (HWC & Tribunal): 12

DECLARATION BY THE SPECIALIST

I, Cindy Postlethwayt, declare that –

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



Cindy Postlethwayt, heritage consultant
Date: 14 March 2024

ANNEXURE B: HWC Response to NID

Our Ref: HM / OVERBERG/ CAPE AGULHAS/ STRUISBAAI/ PORTION OF FARM 281-RE
Case No.: HWC23090406CH0904
Enquiries: Chané Herman
E-mail: chane.herman@westerncape.gov.za
Tel: 021 483 5959

Cindy Postlethwayt / Helemika Number 1 (Pty) Ltd
cindy@cpheritage.co.za

ILifa leMveli leNtshona Koloni
Erfenis Wes-Kaap
Heritage Western Cape

RESPONSE TO NOTIFICATION OF INTENT TO DEVELOP: HIA REQUIRED
In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape Provincial Gazette 6061, Notice 298 of 2003

NOTIFICATION OF INTENT TO DEVELOP: PROPOSED SUBDIVISION AND RESIDENTIAL DEVELOPMENT ON REMAINDER FARM 281, PAAPEKUILFONTEIN, STRUISBAAI SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)

The matter above has reference.

Heritage Western Cape is in receipt of your application for the above matter received. This matter was discussed at the Heritage Officers Meeting held on 11 September 2023.

You are hereby notified that, since there is reason to believe that the proposed subdivision and residential development on Remainder Farm 281, Paapekuilfontein, Struisbaai, will impact on Heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA be submitted. Section 38(3) of the NHRA provides

(3) *The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection (2)(a):* ***Provided that the following must be included:***
(a) The identification and mapping of all heritage resources in the area affected;
(b) an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7;
(c) an assessment of the impact of the development on such heritage resources;
(d) an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;
(e) the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;
(f) if heritage resources will be adversely affected by the proposed development, The consideration of alternatives; and
(g) plans for mitigation of any adverse effects during and after the completion of the proposed development.

This HIA must in addition have specific reference to the following:

- Archeological Impact Assessment
- Desktop Paleontological Impact Assessment
- Visual Impact Assessment

The HIA must have an overall assessment of the impacts to heritage resources which are not limited to the specific studies referenced above.

The required HIA must have an integrated set of recommendations.

The comments of relevant registered conservation bodies; all Interested and Affected parties; and the relevant Municipality must be requested and included in the HIA where provided. Proof of these requests must be supplied.

ILifa leMveli leNtshona Koloni
Erfenis Wes-Kaap
Heritage Western Cape

Our Ref:	HM / OVERBERG/ CAPE AGULHAS/ STRUISBAAI/ PORTION OF FARM 281-RE
Case No.:	HWC23090406CH0904
Enquiries:	Chané Herman
E-mail:	chane.herman@westerncape.gov.za
Tel:	021 483 5959

If applicable, applicants are strongly advised to review and adhere to the time limits contained the Standard Operational Procedure (SOP) between DEADP and HWC. The SOP can be found using the following link http://www.hwc.org.za/node/293

Kindly take note of the HWC meeting dates and associated agenda closure date in order to ensure that comments are provided within as Reasonable time and that these times are factored into the project timeframes.

HWC reserves the right to request additional information as required.
Should you have any further queries, please contact the official above and quote the case number.

.....
Waseefa Dhansay
Assistant Director: Professional Services

Heritage Western Cape
Erfenis Wes-Kaap
ILifa leMveli leNtshona Koloni

13 September 23

ANNEXURE C: Palaeontological Impact Assessment

(included as a separate e-file)

ANNEXURE D: Archaeological Impact Assessment

(included as a separate e-file)

ANNEXURE E: Botanical Scoping Assessment

(included as a separate e-file)

ANNEXURE F: Visual Impact Assessment

(included as a separate e-file)

ANNEXURE G: Criteria heritage significance

Cultural significance is defined as: aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance. The national estate includes, inter alia, places, buildings, and structures of cultural significance; historical settlements and townscapes; and landscapes and natural features of cultural significance (NHRA)

Section 3(3) of the NHRA identifies criteria for assessing the significance of a place. In respect of those values relevant to this property, a place has heritage significance, inter alia, because of:

a) Historical value
- It is important in the community or pattern of history (including in the evolution of cultural landscapes and settlement patterns; association with events, developments or cultural phases) or illustrates an historical period
- It has a strong or special association with the life or work of a person, group or organisation of importance in history
- its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- It has significance relating to the history of slavery

b) Architectural value
- *i.* It is significant to architectural or design history or is the work of a major architect or builder
- *ii.* It is an important example of a building type, style or period
- *iii.* It possesses special features, fine details or workmanship

c) Aesthetic value

It is important in exhibiting particular aesthetic characteristics valued by a community or cultural group (including its contribution to the aesthetic values of the setting demonstrated by a landmark quality or having an impact on important vistas or otherwise contributing to the identified aesthetic qualities of the cultural environs or the natural landscape within which it is located)

d) Social value
- *i.* It is associated with economic, social or religious activity
- *ii.* It is significant to public memory
- *iii.* It is associated with living heritage (cultural traditions, public culture, oral history, performance or ritual)

e) Spiritual value
- *i.* It is associated with religious activity and/or phenomena
- *ii.* It is significant to a particular group relating to spiritual events and/or activities

f) Linguistic value
- *i.* It is associated with the custodianship and/or sustainability of a particular language or events associated with that language
- *ii.* It is significant to a particular group relating to the evolution and/or dissemination of a particular language

g) Technical/Scientific value
- *i.* Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage
- *ii.* Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- *iii.* Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- *iv.* It is important to archaeology, palaeontology, geology or biology

The grading of heritage significance is based on the three tier grading system used in the NHRA and HWC's guidelines "Grading: Purpose and management Implications" (16 March 2016).

ANNEXURE H: Development proposal

(included as a separate e-file)

ANNEXURE I: Public participation

(to be included as a separate e-file)