DRAFT HERITAGE IMPACT ASSESSMENT FOR PUBLIC COMMENT
PROPOSED DEVELOPMENT OF ERF 3495, STRUISBAAI

To be submitted for Comment in terms of Section 38(8) of the NHRA
HWC Case Number: HWC23083108MS0904



November 2026

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

EXECUTIVE SUMMARY

1. Site Name:

The property concerned, Erf 3495, Struisbaai is situated on the western side of Adelle Street and at the edge of existing urban development in the coastal town of Struisbaai, in the Bredasdorp district. The landholding is 12.2244ha in extent and zoned Agriculture It is undeveloped, not farmed and in its natural state. It is located within the Urban Edge.

2. Location:



3. Description of Proposed Development:

The proposal is for the subdivision of the site into 72 single residential opportunities and a Nature Conservation Area: Private Open Space: 39600,3m^2 (32.7% of site). It is a limited access estate with architectural guidelines.

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 and natural significance are the primary heritage informants, given that the site is located within an area indicated as a CBA1, and currently at the outer edge of existing built form (although well within the Urban Edge).

The visual significance of the receiving environment is considered to be of **Medium or Moderate** visual sensitivity**.** Visual quality is enhanced by the intactness of the landscape and the absence of visual intrusions. The site is largely undisturbed and in its natural state, at the periphery between the town and the open natural landscape, and is considered a good quality natural landscape.

Significantly, the vegetation at Erf 3495, Struisbaai is of one Critically Endangered vegetation types, Agulhas Limestone Fynbos. The result of application National Web-based Environmental Screening Tool for

the Relative Terrestrial Biodiversity Theme Sensitivity is **Very High Sensitivity.**

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:* none

g) Palaeontological and *Archaeological Resources:*
The palaeontological sensitivity of the Cenozoic coastal formations is generally rated high and this particularly applies to the potential for the scientifically valuable fossil bones of terrestrial animals to occur. According to SAHRIS the Waenhuiskrans Formation is rated Very High due to previous fossil bone finds in coastal developments. However, a field survey is unlikely to discover fossil bones in view of the vegetation cover.

The fossil bones that may occur in the Waenhuiskrans Fm. in the Project Area are expected to be of later Quaternary age, between ~160 to ~100 ka and therefore mainly comprised of representatives of the extant (living) fauna, but unexpected species may occur, as a result of phases of different ecological and palaeoclimatic conditions in the past, as well as the bones of some species which became extinct in the geologically-recent past.

The later Quaternary fauna is fairly well known from archaeological sites and hyena bone accumulations and additional finds are considered to be of moderate scientific importance, *i.e*. formations known to contain palaeontological localities and that have yielded fossils that are common elsewhere, and/or that are stratigraphically long-ranging, would be assigned a **Moderate** rating.

Being on a topographically-elevated ridge crest the site has a reduced probability of fossil bones being relatively common as a local water source such as a spring or vlei as a focal point for herbivores and their predators is unlikely to have been present.

Struisbaai is generally an area regarded to be of high archaeological sensitivity. However, precedent would seem to indicate that these sensitivities are generally found on the coastline of the area (which this site is not).

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 the last remaining extent of the farm post the last 2013 subdivision. It is thus not regarded as being likely to have any direct associations with slavery.

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

5. Anticipated Impacts on Heritage Resources:

Alternative 1 is not supported.

The potential for Palaeontological Impacts have been assigned a **Moderate** rating and mitigation measures are proposed.

The residual Botanical and Terrestrial Biodiversity Impacts are **Medium Negative**. A residual Medium Negative impact on a Critically Endangered ecosystem requires consideration of a biodiversity offset. The draft Struisbaai Conservation Master Plan (approximately 327 ha) can fulfil this function at landscape scale if its conservation areas are legally secured, managed, and demonstrated to be adequate for

the combined developments of the Master Plan. This determination rests with the competent authority, CapeNature and SANParks.

With the mitigation measures set out in this report, the Planning, Design and Construction Phase visual impact is reduced from medium adverse to low adverse significance, and the Operational Phase visual impact is reduced from moderate adverse to low to moderate negative significance. The residual impact is driven principally by the transformation of natural fynbos and by the elevated position of the site, which cannot be fully screened, but which can be brought within acceptable limits through the height, form, colour and landscape controls recommended

6. Recommendations:

It is recommended that Heritage Western Cape:

- Endorses this report as having met the requirements of Section 38(3) of the NHRA;
- In terms of Section 38(8) of the NHRA supports the proposed development on Erf 3495 on condition that:
    - The Architectural Guidelines and Landscape Master Plan should be refined/finalised to ensure congruity and to incorporate the recommendations of this report, including the Mitigations, with particular attention to the double storey zones on the northern and southern edges, the plant palette and lighting.
    - The simulations from Viewpoints 1 to 12 should be developed to assess and test the proposed mitigation measures.
    - Once these visual simulations and congruent, revised Landscape Master Plan and Architectural Guidelines are completed, they should be submitted to the Visual Impact Assessor for final visual impact assessment, to be submitted for ratification by HWC.
    - Final plans are generally in accordance with the layout and development guidelines for Erf 3495, Struisbaai, as shown on REV 2 Alternative 2 and included as Annexure G to this report, as mitigated, refined and supported by HWC.
    - The mitigation measures listed in Section 15 of this report are included as conditions of the Environmental Authorisation and implemented.

7. Author/s and Date: This integrated HIA (November 2026) 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
- Botanical Impact Assessment: David McDonald of Bergwinds
- Environmental Impact Assessment: Michelle Naylor of Lornay Environmental Consulting
- Town Planners: Umsiza Planning

8. Procedures followed: The HIA follows the requirements of s38(8) of the NHRA. The draft HIA is to be advertised for comment and comments will be incorporated for consideration into the final proposals and HIA, to be submitted then for Final Comment from HWC.

Table of Contents

SPECIALIST DETAILS, EXPERTISE AND DECLARATION 6
1. Property details 7
2. Background 8
3. Legal requirements 8
4. Methodology 8
5. Assumptions and Limitations 9
6. Policy Context 10
6.1 Heritage 10
6.2 Planning 10
7. Historical background 11
8. Cultural landscape context 14
9. Site 16
9.1 Palaeontology 16
9.2 General description 17
10. Visual Considerations 22
10.1 Type and Significance of Receiving Environment 23
10.2 The site within the receiving landscape 23
11. Heritage Resources & significance 24
12. Development informants 27
13. Development Proposal 28
14. Heritage Impact Assessment 33
14.1 Palaeontological impacts 33
14.2 Botanical & Terrestrial biodiversity 33
14.3 Visual implications of the proposed development 36
15 Mitigation 40
15.1 Palaeontology 40
15.2 Botanical 41
15.3 Visual 41
16. Public Comment 43
17. Recommendations 43

References 44

Annexure A: Specialist details and declaration 45
ANNEXURE B: HWC Response to NID 46
ANNEXURE C: Palaeontological Impact Assessment 47
ANNEXURE D: Botanical & Terrestrial Biodiversity Impact Assessment 48
ANNEXURE E: Visual Impact Assessment 49
ANNEXURE F: Criteria heritage significance 50
ANNEXURE G: Development proposal 52
ANNEXURE H: Public participation 53

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.

All intellectual property rights and copyright associated with Cindy Postlethwayt's services are reserved, and project deliverables, including hard and electronic copies of reports, maps, data, and photographs, may not be modified or incorporated into subsequent reports in any form, or by any means, without accurate referencing to this work. Any recommendations, statements or conclusions drawn from, or based upon, this report, must be accurate and make reference to the source.

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, Erf 3495, Struisbaai is situated on the western side of Adelle Street and at the edge of existing urban development in the coastal town of Struisbaai, in the Bredasdorp district. The landholding is 12.2244ha in extent and undeveloped, not farmed and in its natural state.



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



Figure 2: Site in the local context of Struisbaai (right) and L'Agulhas (left) (CFM)



Figure 3: Site (CFM)

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:

- Palaeontological Impact Assessment.
- Visual Impact Assessment of the Cultural Landscape.

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 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 property is zoned Agricultural. A rezoning from Agriculture to Subdivisional Area to create approximately 71 single residential sites, a street and open spaces; and subdivision will be required to facilitate the proposed single residential development.

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 and Conservation Body; 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 Visual Impact Assessment (VIA), Botanical Impact Assessment and Palaeontological Impact Assessment (PIA) have been integrated directly into the report.

Design Informants: Heritage 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+
- Palaeontological Consultant: John Pether
- Botanical & Terrestrial fauna Impact Assessment: Dave McDonald from Bergwind
- Environmental Consultant: 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 Struisbaai, a number of homesteads, including Zoetendals Vlei and numerous shipwrecks.

6.2 Planning

The Cape Agulhas Municipality Spatial Development Framework (SDF) 2022 – 2027 (approved 2024) identifies the site as well within the Urban Edge, and within a Critical Biodiversity area (CBA), recommended for protection. It is however also identified for future residential.



Figure 4: Cape Agulhas SDF 2022 to 2027 (Environmental Protection and Heritage), site arrowed

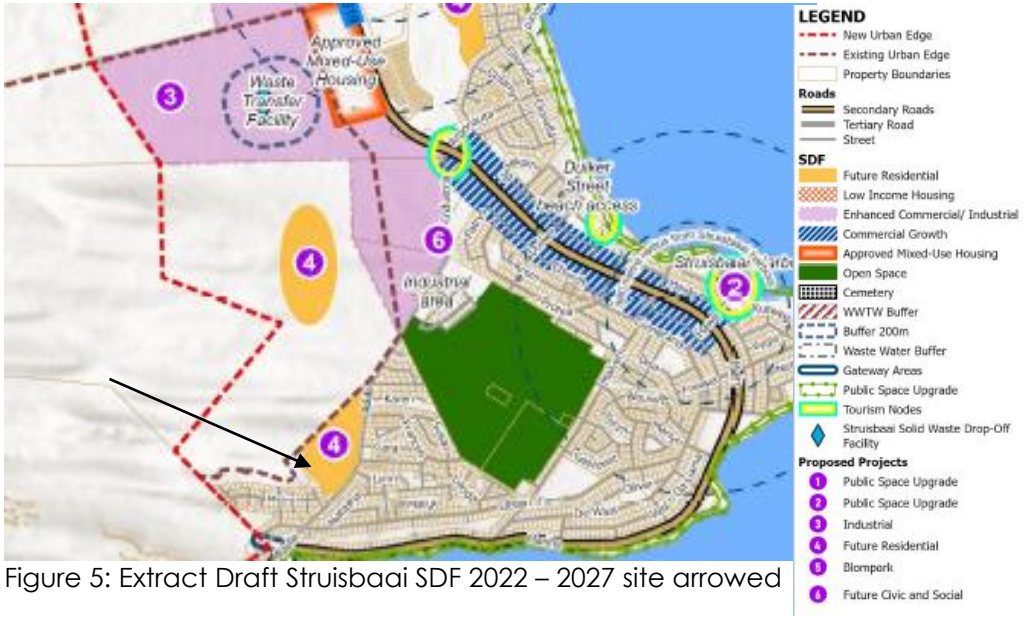


Figure 5: Extract Draft Struisbaai SDF 2022 – 2027 site arrowed

7. 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 Khoikhoi-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 Khoikhoin 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 6: 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.

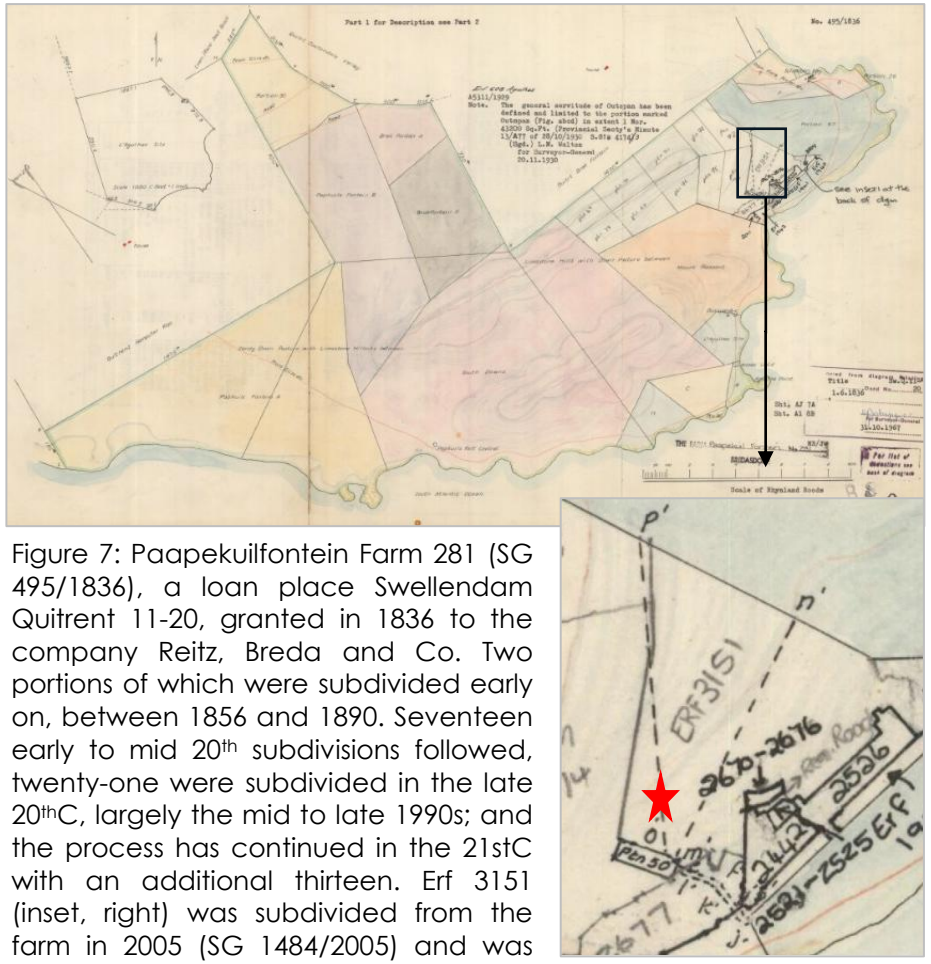


Figure 7: Paapekuilfontein Farm 281 (SG 495/1836), a loan place Swellendam Quitrent 11-20, granted in 1836 to the company Reitz, Breda and Co. Two portions of which were subdivided early on, between 1856 and 1890. Seventeen early to mid 20th subdivisions followed, twenty-one were subdivided in the late 20thC, largely the mid to late 1990s; and the process has continued in the 21stC with an additional thirteen. Erf 3151 (inset, right) was subdivided from the farm in 2005 (SG 1484/2005) and was

itself subdivided into three (General Plan 1485.2005), of which the subject property formed one.

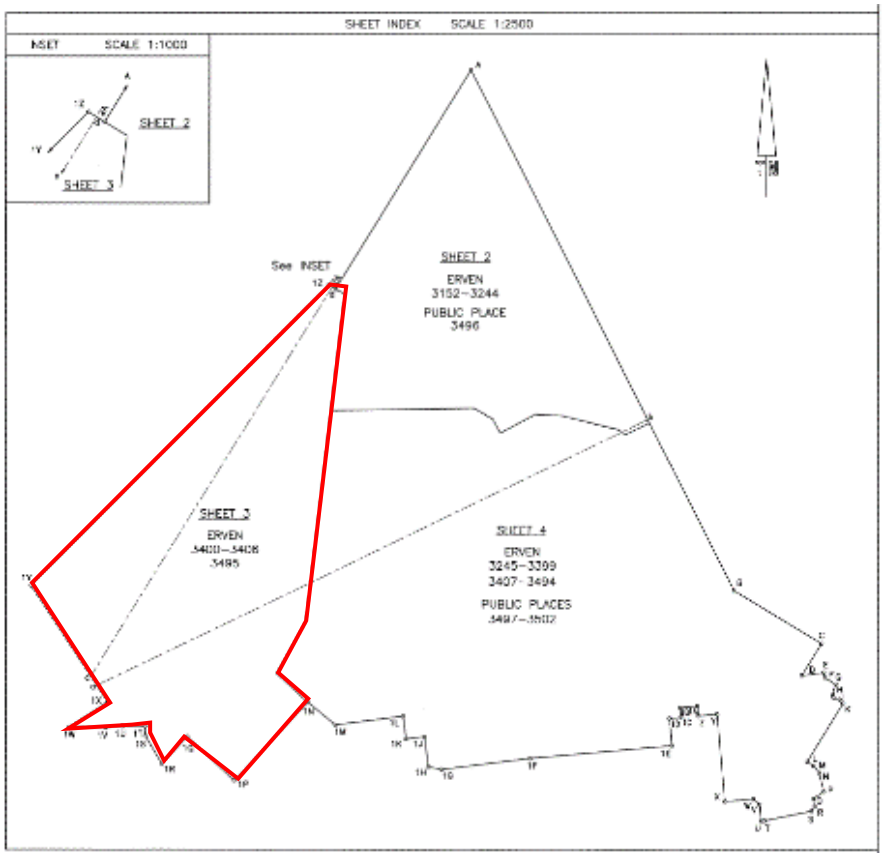


Figure 8: General Plan 1484/2005, property concerned identified, The other two erven have subsequently been subdivided into 344 residential erven.

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 9: Remarks recorded on SG Diagram 495/1836

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 origin 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

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

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 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, incorporating the property concerned in 2017 into the Urban Edge.

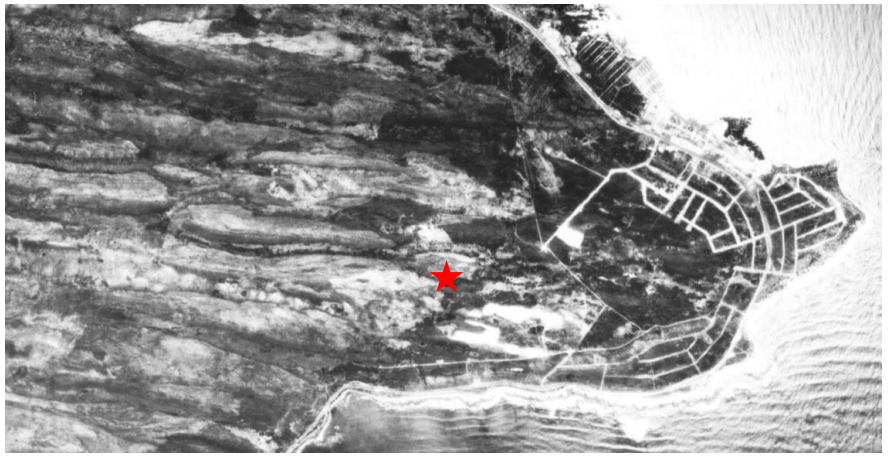


Figure 10: 1961 aerial (461_016_08825), approximate location of property concerned starred.

[4] Dennis (2009): 29



Figure 11: 1980 aerial (498_148_011_00349)



Figure 12: 2003 aerial (1074_C06_01195)

8. Cultural landscape context

There are a significant number of proclaimed nature reserves in the region, including De Mond Nature Reserve Complex, Heuningsrivier Private Nature Reserve, and the Agulhas National Park: "The Cape Floristic Region (CFR) Biodiversity Hotspot is a globally significant repository of biodiversity, recognised for its high vulnerability. The Agulhas Plain constitutes one of the largest extant storehouses of lowland fynbos and Renosterveld habitats in the world. The diversity of habitat types, wetland ecosystems, Red Data plant species and local endemics is unmatched in the CFR."[5]

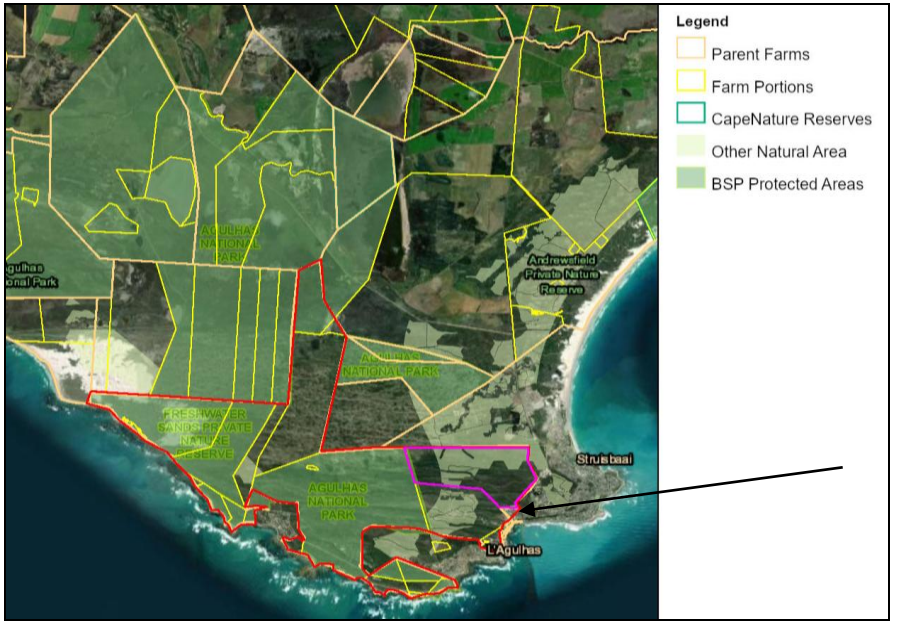


Figure 13: Remaining extent of Paapekuilfontein and site (arrowed) in the context of surrounding conservancies (CFM)

[5] Agullhas National Park Management Plan (2006): 3

The Agulhas Plains is a low-relief, sandy "plains" landscape with numerous marshes, vleis and pans, which contrasts strongly to the topographically complex Overberg 'ruggens' and the coastal foreland. It is dominated by "limestone fynbos," a low-stature, but species-rich shrubland with some of the most intact fynbos fragments which consist of different critically endangered vegetation types. It is visually sensitive only in that any form of development tends to be visible especially in the flatter, open landscape at the approach to Struisbaai.

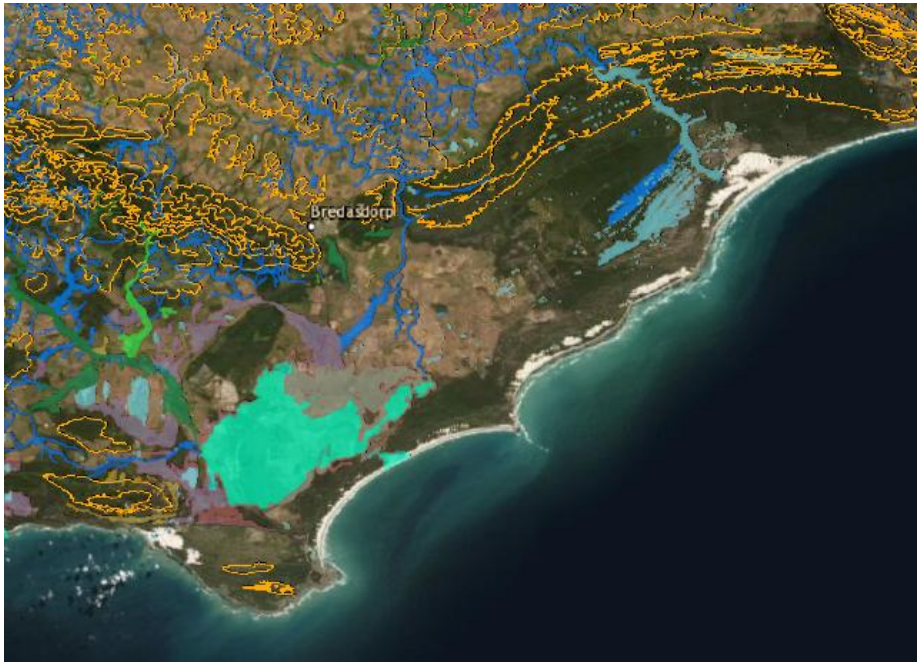


Figure 14: Agulhas Plains topography 1:100m contours (CFM).

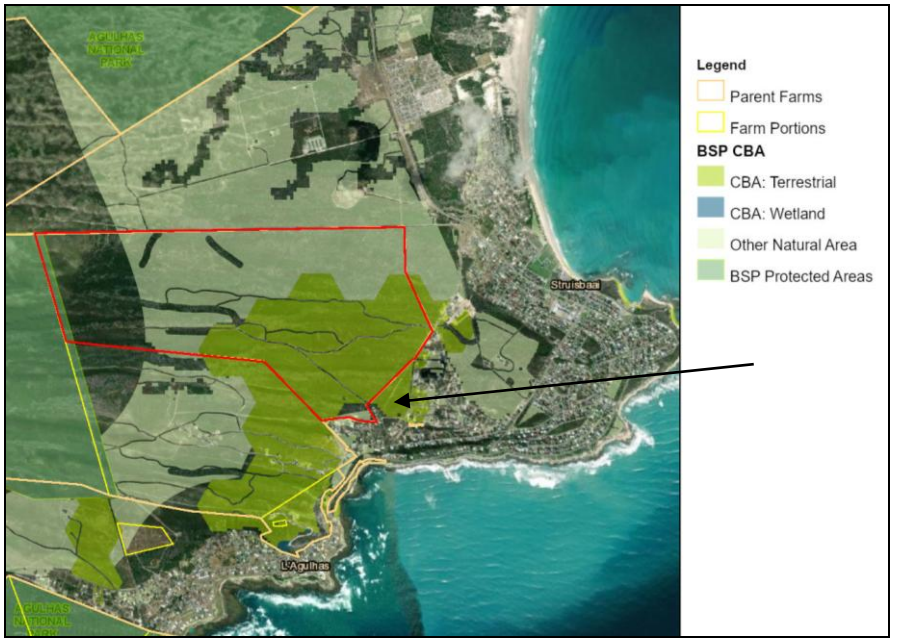


Figure 15: Conservation status (CFM)

The primary character of this landscape is that of the natural attributes, rather than the cultural attributes.

Terra+: One of the defining features of Struisbaai's regional landscape is its flat and low-lying terrain. Unlike many areas in the Western Cape, Struisbaai is far removed from mountain ranges. Instead, the land gently slopes towards Indian Ocean (cosmic landscape), until the very coastal border where it suddenly slopes to meet the ocean.

The receiving environment is a slowly evolving, vernacular, coastal cultural landscape that has been modified over time and adapted through fishing and residential use. Urban expansion has been slow

and contained, largely because the towns are surrounded by protected natural areas and critical biodiversity areas.

There is an established and recognised sense of place: a small, low-scale fishing and holiday town set between the fynbos and the sea.

Agulhas is identified as a cultural landscape of significance, located at the southernmost tip of Africa and attracting visitors throughout the year. The surrounding area has important vistas and scenic routes. The site itself is a low rise of moderate elevation; it does not form part of a prominent mountain ridgeline, but it does form a local skyline when seen from the lower ground to the north and north-east.

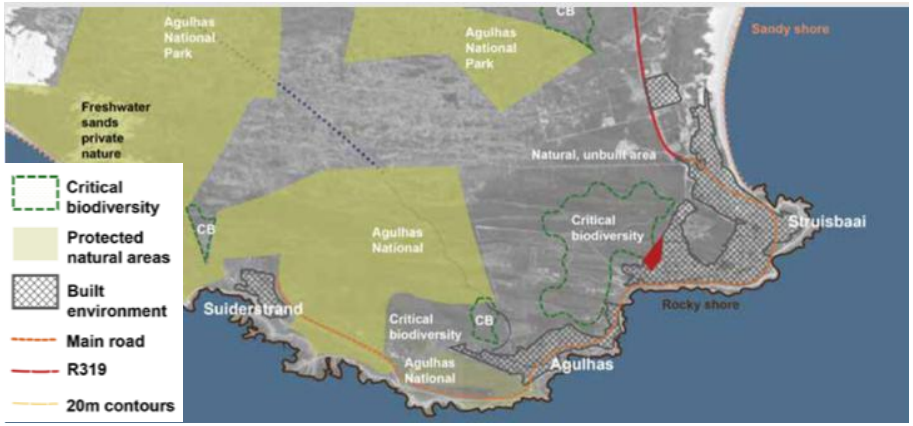


Figure 16: The site outline in red in its local context with a focus on the built environment versus natural vegetation and arteries between the towns (Terra+)

9. Site

9.1 Palaeontology

The Palaeontological Impact Assessment (Pether, October 2026) is appended as Annexure C and summarised as follows (without direct referencing for ease of reading):

The Project Area is underlain by the capping calcrete of the Waenhuiskrans Fm. aeolianite and is vegetated by Agulhas Limestone Fynbos. The fossil content typical of aeolianites is of relevance, particularly the fossils found in the calcrete which is a cemented fossil soil (a pedocreted palaeosol). The calcrete has formed over a long period of at least 100 thousand years or more since the dunes forming the ridge became inactive.



Figure 17: The calcreted dune ridge landscape of the area viewed from the south end of Adelle Street.

FOSSILS IN AEOLIAN SANDS

Fossils are understandably very sparse in the main part of "fossil dunes" that were previously actively migrating and typified by large-scale dune slipface crossbedding.

In aeolianites in general, both the ambient fossil fauna and sporadic occurrences of the bones of larger animals (e.g. antelopes) are more abundant in association with old, buried land surfaces (palaeosurfaces) and their soils (palaeosols), formed during periods of sand stabilization and vegetation growth. These palaeosurfaces and palaeosols serve to separate the thick aeolianite units formed by the episodic accumulation of previously migrating sand dunes and sand sheets.

The most common fossil material seen in aeolianites are trace fossils such as calcified plant roots which are hidden within the calcrete

and extend below it. Termite burrow systems are also ubiquitous and are usually mistaken to be fossil plant roots, except for termitaria or "hives" which are distinct constructions of layered chambers. The burrows of moles/mole-rats are also common in palaeosols. Due to their abundance these trace fossils are not generally of importance for rescue collection.

The ambient fossil fauna refers to smaller skeleton fossils which are most commonly seen on close inspection such as land snails, mole-rat bones and tortoise shells/bones. Other small bones occur very sparsely such as bird and small mammal bones (*e.g.* various rodents). These ambient fossils most noticeably occur when they have been concentrated in thin layers by the temporary removal of sand by the wind. Although small, the ambient fossil fauna reflects the palaeoenvironment such as the climate and vegetation type.

The important fossil bones of larger animals, as mentioned, are overall sparse in aeolianites, but occur in markedly greater abundance on palaeosurfaces surrounding water sources such as the margins of local vleis and springs/seeps. The deposits of local ponds are locally interbedded in aeolianites and are richly fossiliferous, including fossil plant material, aquatic snails and frogs. The most spectacular bone concentrations found in aeolianites are due to the bone-collecting behaviour of hyaenas which store bones in and around their lairs in large burrows. These lairs are often excavated below hard ledges such as calcreted palaeosols cropping out in the slopes of eroded aeolianites.

The eroding cliffs of the aeolianites expose bedding planes with a variety of animal tracks, as well as the footprints of ancient humans. The last few years has seen the discovery of many animal tracks in the Waenhuiskrans Fm. sea cliff exposures east of Cape Agulhas. These trace fossils provide a glimpse of Pleistocene dune life and suggest an area teeming with large mammals, including elephant, rhino, giraffe, the extinct giant Cape buffalo and giant Cape horse (Roberts *et al.*, 2008; Helm *et al.*, 2018a, 2018b, 2018c, 2019). These animal-track trace fossils complement the fossil bones in the Waenhuiskrans Fm. in providing more information on the faunas moving between the now-drowned grasslands of the palaeo-Agulhas Plain and the inland biomes.

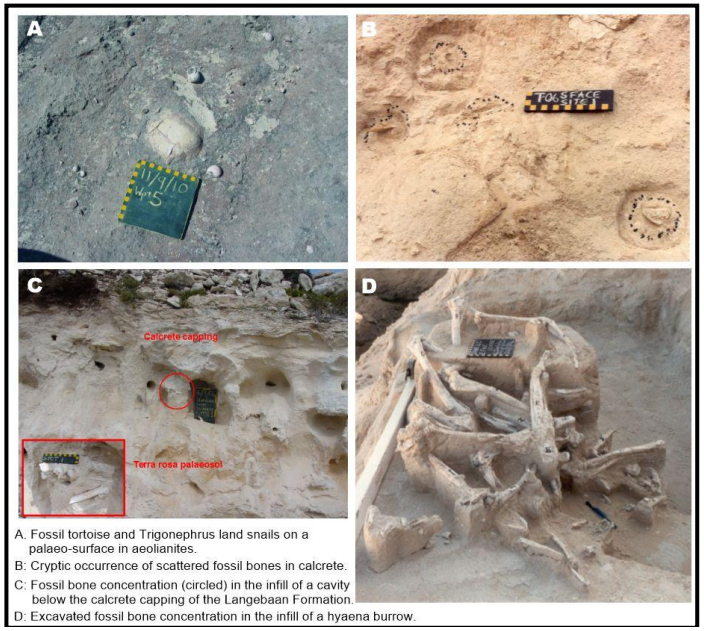


Figure 18: Examples of fossil bones in aeolianites.

9.2 *General description*

The site is undeveloped, naturally vegetated and situated across two ridgelines. The existing edge of urban development is located along the eastern and south-eastern edge of Adelle street and comprises low density single residences. An industrial area is located further north as Adelle street becomes Industria Road. The general landscape context, to the north and west, outside the existing extent of urban development comprises a series of undulating vegetated dunes, creating a complex visual natural landscape.

As can be seen from the 5m contours, the site occupies a low, rounded rise on the western edge of the town. The southern and central portion of the site, where development is proposed, is relatively flat, with a broad crest running roughly east to west through the central erven. From this crest the ground falls gently southwards towards Noreen Street and eastwards towards Adelle Street, and falls steeply northwards across Erf 80 towards Santie Street. Due to its elevation relative to the town, the crest enjoys panoramic views over the town, the bay and the sea.



Figure 19: Site in broader topographical context, 5m contours(CFM)

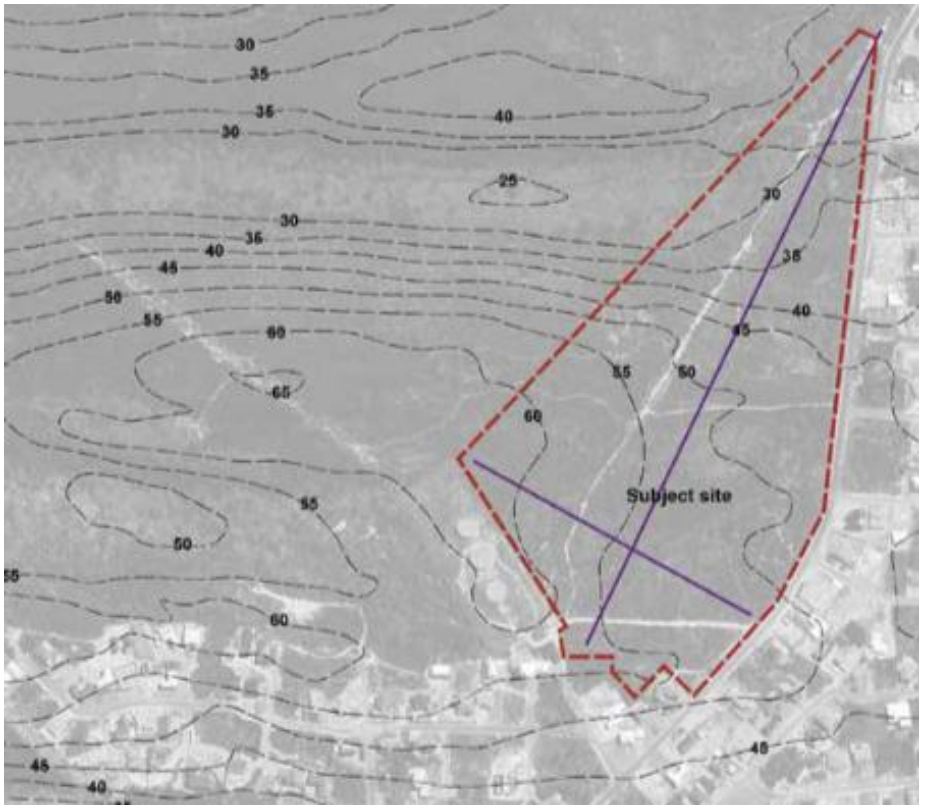
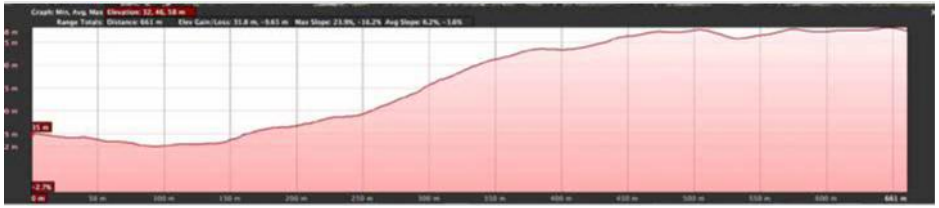


Figure 20: Site topography, 5m contours(Terra+)


Figure 21: Site elevation long side (Terra+)

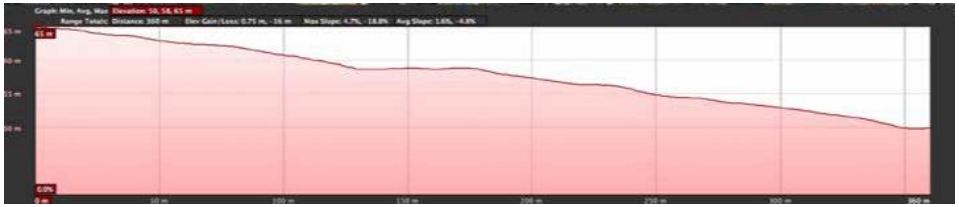

Figure 22.: Site elevation short side (Terra+)



Figure 23: Image depicting the typical mix of residential building styles as can be seen in Struisbaai, close to the subject site. Typically, residential properties in Struisbaai are single free standing units limited to 2 storeys, each with approximately 50% of the property left naturally open (Terra+)



Figure 24: Site right of roadway from north-eastern corner looking south



Figure 25: Site from south-western boundary looking north



Figure 26: Site from south-western boundary, residential development on its southern corner



Figure 27: Site from southern corner, adjoining residential development



Figure 28: Site (left) from Adelle Street north-bound



Figure 29: Site (left) from Adelle Street north-bound, the site topography evident



Figure 30: Site (left) from Adelle Street north-bound, suburban development right

The site botanical attributes are described in the Botanical & Terrestrial Biodiversity Impact Assessment (Bergwind) appended as Annexure D. Direct extracts are made without detailed referencing for ease of reading.

The vegetation at Erf 3495, Struisbaai, is all Agulhas Limestone Fynbos, a Critically Endangered vegetation type that occurs on the Agulhas Plain on calcareous soils. Overberg Dune Strandveld (Endangered) forms a narrow band along the coast



Figure 31: The vegetation is mid-high to tall, restioid and proteoid fynbos shrubland (McDonald)

Of particular interest is the presence of *Mimetes saxatilis* (Proteaceae), an **ENDANGERED**, endemic species that has its eastern limit of distribution at Struisbaai. These plants cannot be relocated in a 'search and rescue' exercise because they do not transplant successfully. Almost the entire erf is classified as a Critical Biodiversity Area 1 and largely critically endangered. The options for development are very few since the habitat is highly threatened.

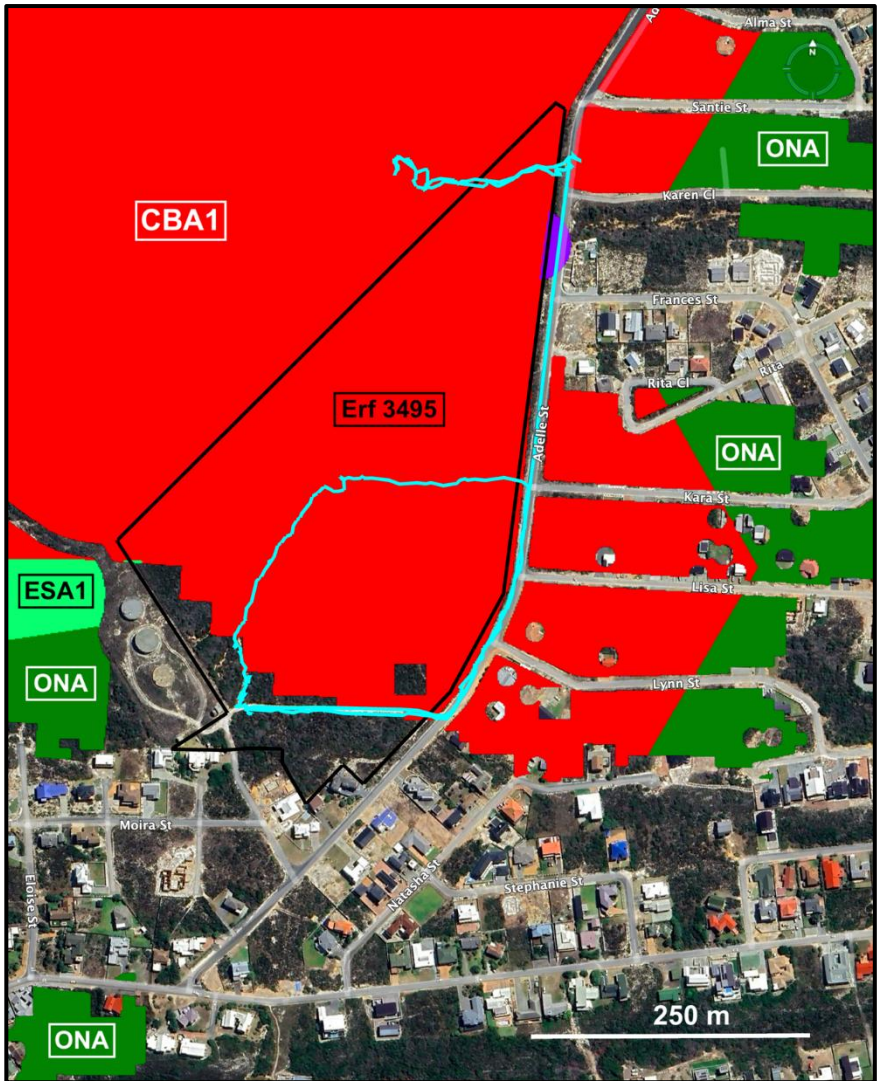


Figure 32: The WCBSP for Agulhas Municipality overlaid on a Google Earth Pro ™ satellite image (McDonald)



Figure 33: The endemic mid-high to tall shrub, *Leucadendron meridianum*, forms dense stands in places where is dominates, on Erf 3495, Struisbaai (McDonald)

During the site surveys the following plant species of conservation concern (SCCs) (*sensu Raimondo et al.* 2009) were recorded, *Diosma awillana* (EN), *Gladiolus miniatus* (VU), *Gladiolus variegatus* (VU), *Leucadendron meridianum* (NT), *Leucospermum patersonii* (NT), *Leucospermum truncatum* (NT), *Mimetes saxatilis* (EN), *Protea obtusifolia* (NT), *Protea susannae* (NT) *and Watsonia fergusoniae* (VU). There are possibly more plant species of conservation concern present, but to record them would need repeated visits in all months of the year and many days of fieldwork, over a few years.

Such is the special nature of Agulhas Limestone Fynbos that this vegetation type harbours threatened plant species due to the unique soil characteristics as well as being under pressure from coastal development.

10. Visual Considerations

The Terra+ Visual Impact Assessment (VIA)[6], included in full in Annexure E, assesses the significance of the landscape and visual considerations.

The proposed residential use is compatible with the surrounding land use. However, as the site lies on the periphery of the town and on the crest of a rise, the development will change the natural fabric and spatial quality of the immediate area, and will be seen as an extension of the town onto previously open land.



Figure 34: Views from the site to the ocean (Terra+)

[6] Quoted extensively hereunder but not directly referenced for ease of reading

10.1 Type and Significance of Receiving Environment

Struisbaai is a small fishing town on the eastern shore of the Agulhas plain, a low, wind-swept coastal landscape at the southernmost tip of Africa. The town looks east across Struisbaai bay, with its harbour, its long white beach curving to the north-east, and the open sea beyond. Behind it, the land rises gently to a series of low limestone and sand ridges covered in coastal fynbos, which separate Struisbaai from L'Agulhas and Suiderstrand to the south-west.

It is a landscape of horizontals: the line of the beach, the sea horizon, the low ridges and the even height of the fynbos. The settlements are small and low, and for the most part read as thin bands of white walls and grey roofs set between the fynbos and the sea. Within this landscape, even modest changes in height or position on a ridge are visible over some distance.

The site occupies one of these low rises on the south-western edge of the town. It forms the transition between the residential streets of Struisbaai and the open fynbos beyond. Due to this combination of factors the site is situated in a cultural landscape of medium to high scenic, cultural and historical significance. The site itself, however, is not a declared scenic or heritage resource, is bounded on two sides by existing development, and can accommodate a degree of change. The significance of the receiving environment is therefore considered to be **Medium to High**.

10.2 The site within the receiving landscape

The relative position of the site to the coast, the R319, the protected areas and the existing town is illustrated in Section 9. The areas to the west and south-west of the site are open fynbos and form part of the continuous natural landscape between Struisbaai and L'Agulhas. The site is positioned at the edge of this landscape and at the end of the residential streets that extend westwards from Main Road.



Figure 35: Views from the site (Terra +)



Figure 36: View 1 of the subject site: natural open area, home to indigenous Fynbos species, overlooking the 14km beach in Struisbaai on the North side (Terra+)



Figure 37 View 2 of the subject site, a natural open area, home to indigenous vegetation, with residential properties on two sides (Terr+).

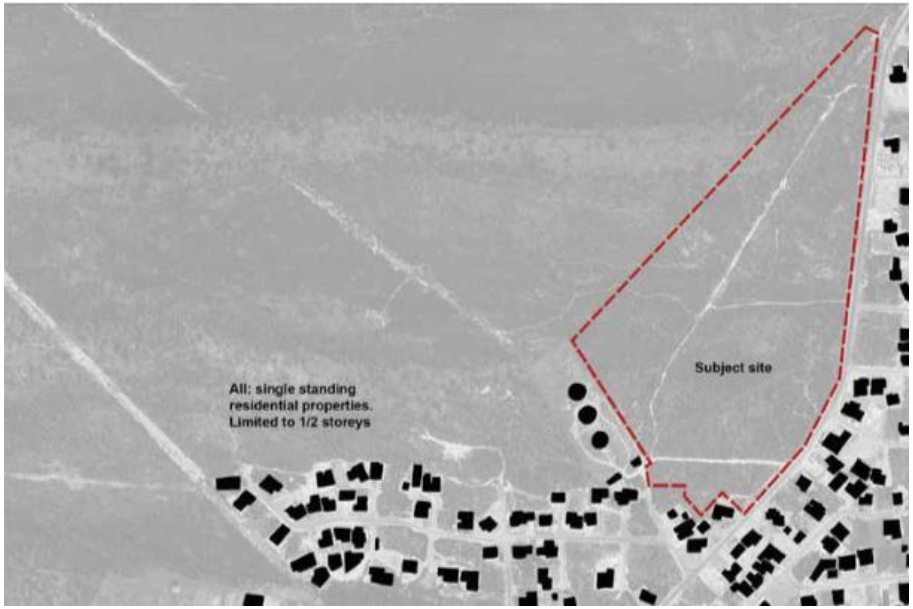


Figure 38: Built fabric surrounding site. All surrounding built fabric are single standing residential plots, limited to 1/2 storeys in height. The site falls with in the boundaries of expansion and proposes to follow the same pattern of development as surrounding properties (Terra+)

11. 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 and natural significance are the primary heritage informants, given that the site is located within an area indicated as a CBA1, and currently at the outer edge of existing built form (although well within the Urban Edge).

The visual significance of the receiving environment is considered to be **Medium or Moderate** visual sensitivity**.** Visual quality is enhanced by the intactness of the landscape and the absence of visual intrusions. The site is largely undisturbed and in its natural state, at the periphery between the town and the open natural landscape, and is considered a good quality natural landscape.

Significantly, the vegetation at Erf 3495, Struisbaai is of one Critically Endangered vegetation types, Agulhas Limestone Fynbos.

- The property supports good condition, mature fynbos shrubland, apart from the patchy invasion by alien invasive woody plants, mainly *Acacia cyclops* and *Acacia saligna* but also Manatoka (*Myoporum* sp.).
- The vegetation supports several limestone endemic plant species, most of which as species of conservation concern.

The result of application National Web-based Environmental Screening Tool for the Relative Terrestrial Biodiversity Theme Sensitivity is **Very High Sensitivity.** The site has uncommon, rare and endangered aspects that it possess reflecting the Western Cape's natural heritage

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:* none

g) Palaeontological and *Archaeological Resources:*
The palaeontological sensitivity of the Cenozoic coastal formations is generally rated high and this particularly applies to the potential for the scientifically valuable fossil bones of terrestrial animals to occur. According to SAHRIS the Waenhuiskrans Formation is rated Very High due to previous fossil bone finds in coastal developments. The Very High rating requires "field assessment and protocol for finds". However, a field survey is unlikely to discover fossil bones in view of the vegetation cover. Obvious surface occurrences should be noticed during the archaeological survey after vegetation clearance.

The fossil bones that may occur in the Waenhuiskrans Fm. in the Project Area are expected to be of later Quaternary age, between ~160 to ~100 ka and therefore mainly comprised of representatives of the extant (living) fauna, but unexpected species may occur, as a result of phases of different ecological and palaeoclimatic conditions in the past, as well as the bones of some species which became extinct in the geologically-recent past.

The later Quaternary fauna is fairly well known from archaeological sites and hyaena bone accumulations and additional finds are considered to be of moderate scientific importance, *i.e*. formations known to contain palaeontological localities and that have yielded fossils that are common elsewhere, and/or that are stratigraphically long-ranging, would be assigned a **Moderate** rating.

Being on a topographically-elevated ridge crest the site has a reduced probability of fossil bones being relatively common as a local water source such as a spring or vlei as a focal point for herbivores and their predators is unlikely to have been present. Hyaena burrow lairs could occur, but these are often located on the eroding slopes of aeolianite ridges where the calcrete carapace is incised and burrowing out a cavity in the softer material beneath it is

possible. The fossil bones in a hyaena burrow will be considerably younger that the age of the calcreted aeolianite. Fossil bones cemented in calcrete are not readily visible as being softer they tend to snap off as the calcrete chunks are unearthed and do not stand out against the pale enclosing matrix

Struisbaai is generally an area regarded to be of high archaeological sensitivity. However, precedent would seem to indicate that these sensitivities are generally found on the coastline of the area (which this site is not).

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 the last remaining extent of the farm post the last 2013 subdivision. It is thus not regarded as being likely to have any direct associations with slavery.

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

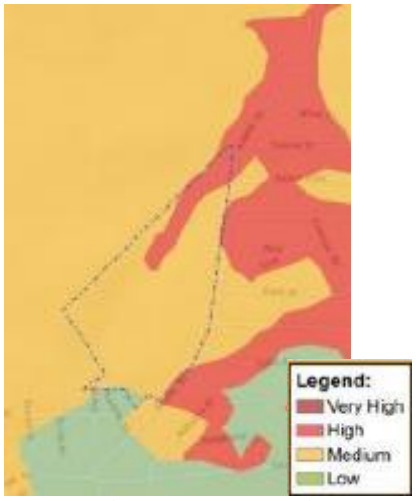


Fig. 39: Palaeontological sensitivity

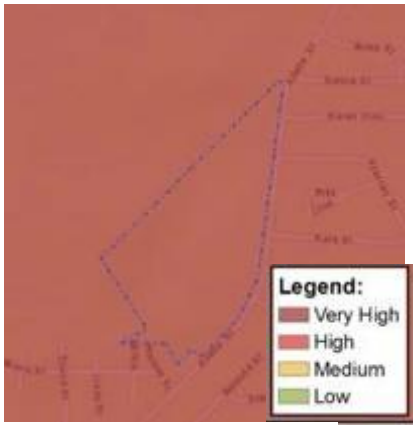


40: Biodiversity


41: Remnants of Red Listed Ecosystems
Red = Critically Endangered Agulhas Limestone Fynbos remnant.



42: Relative Plant Species Theme



43: Relative Terrestrial Biodiversity Theme Sensitivity

12. Development informants

This integrated impact assessment acknowledges that the development site falls well within the urban edge of Struisbaai and has no intrinsic historical or architectural significance. However, it contributes to contextual significance in so far as it retains its open and natural qualities at the current edge of urban development and is of very high significance in terms of its designation as CBA1.

Due to its natural state and elevated position, the site is sensitive to new development. Care must be taken to retain and reinstate as much of the natural vegetation as possible, to keep the built form low, and to remain in keeping with the existing pattern of development.

- Recognise the broader cultural landscape and consider the site as a component within it
- Retain and enhance the coastal sense of place (form, scale and typology of buildings and landscape)
- Avoid new built skylines visible from the coast and the R319
- Urban-natural transition: planted buffer of naturally occurring species between neighbours and new development
- Retain view lines towards the sea; allow visual permeability at site boundaries
- Conserve and integrate the open area on the north side of the site
- Use naturally occurring species in gardens, buffers and open space.



Figure 44: Composite visual indicators (Terra+)

13. Development Proposal

The concept proposal included in full in Annexure G. Both development alternatives include the subdivision of the site into single residential opportunities within a private access controlled estate and development parameters established by Architectural Guidelines.

No Go status quo remains, no development, no further actions on site

Alternative 1 (not preferred)
This is an option which proposes denser development, which makes provision for 93 Single Residential I erven, streets and a Conservation Area of approximately 2.063ha, located separately and on the other side of the steepest section of the site. No development guidelines were provided.

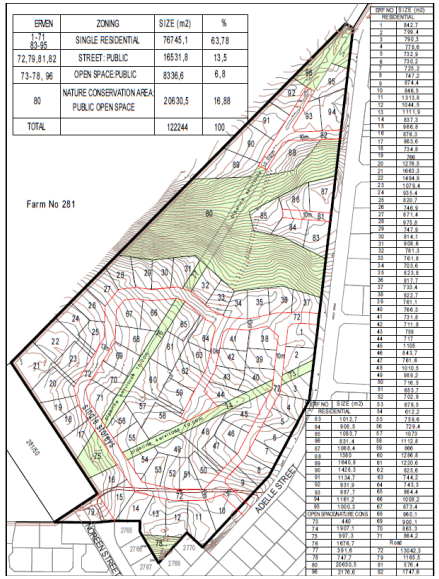


Figure 45: Alternative 1 (Not Preferred)

Alternative 2 (preferred) where development is confined to the southern extent of the site, proposes 72 Single residential erven over approximately 51% of the total area and a Conservation Area of approximately 3.96ha over approximately 32.7% of the area. The remainder comprises streets and private open space.

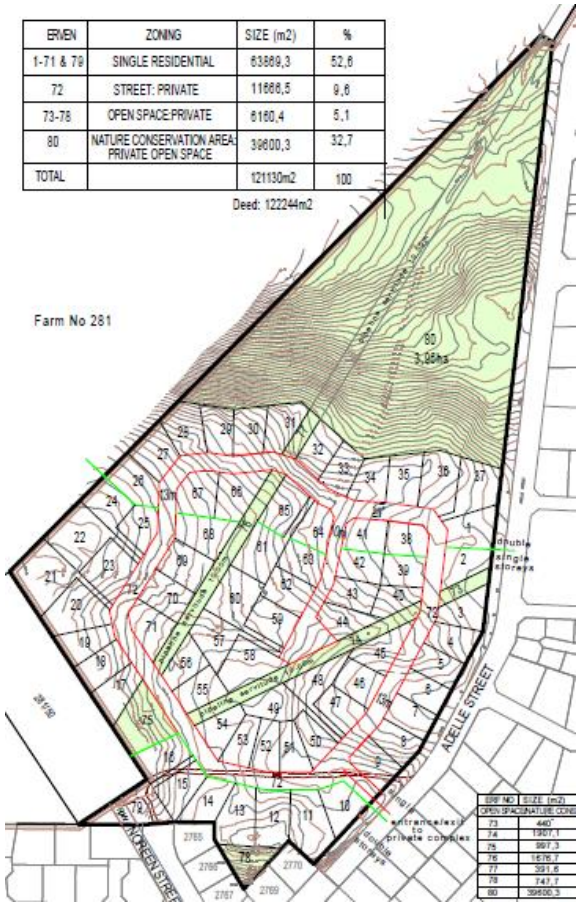


Figure 46: Alternative 2 subdivision plan

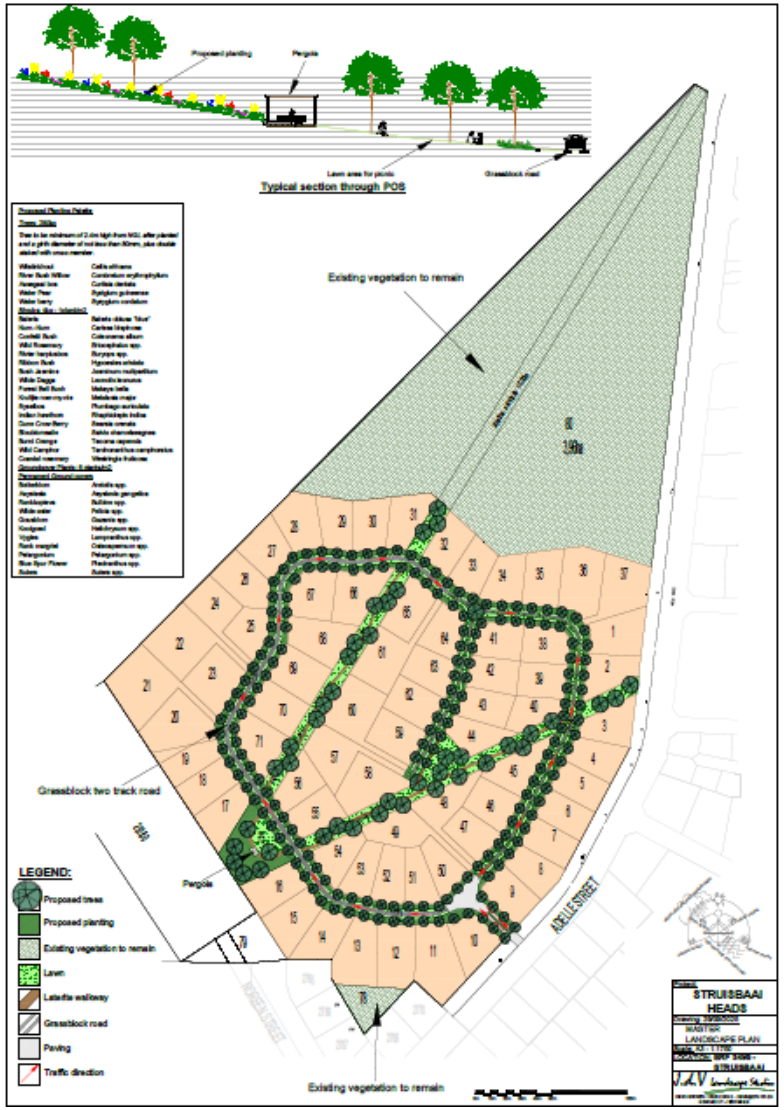


Figure 47: Alternative 2 Landscape SDP

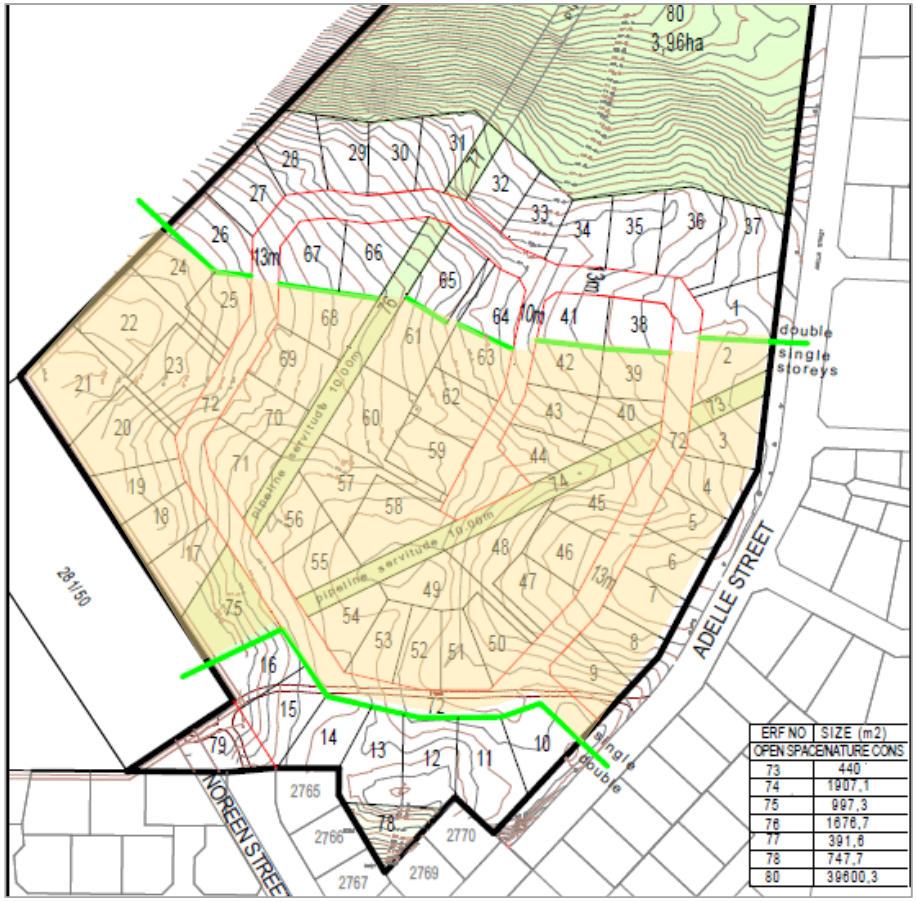


Figure 48: Heights are limited to single storey in the area shaded yellow (max height 6m), and double storey (max height 7.5m) for the remainder. Coverage is 50%. The central erven, which straddle the ridge line and the upper slope, are limited to single storey so that the development reads as a low, stepped group. In the double storey zone, the upper floor may not exceed 50% of the ground floor footprint. Ground floor platforms may not be raised more than 1.0 m

above natural ground, which is of particular importance on the ridge line erven (approximately Erven 4, 5, 22, 23, 44, 62 and 69)

Primary aspects of the draft design intent is articulated in the Architectural Guidelines as follows:
The architectural language is one of simple, contemporary coastal buildings that take their cue from the regional vernacular without copying it. In practice this means:

- Houses made up of a few simple, narrow, pitched-roof forms rather than one large block.
- Major forms must be rectangular, a maximum of 6,5 m wide (outside wall to outside wall), with a length of at least 1,5 times the width. They must have double-pitched roofs, with a central ridge, pitch 17,5° to 40°.
- Forms linked by lighter, lower elements – flat-roofed links, verandahs, lean-tos and pergolas.
- Low, horizontal buildings that step with the slope and sit close to natural ground.
- A restrained palette – warm off-white render, local limestone, weathered timber and dark grey roofs – that blends with fynbos and coastal thicket.
- Minimal night lighting, no visual clutter, and gardens planted with locally indigenous species.
- Single storey houses on the central slopes so that upper erven keep their views, with double storey houses limited to the northern and southern edges.
- Garages and outbuildings must match the house roof. Free-standing major form garages follow the 1 : 1,5 plan proportion.

Tuscan, Georgian, Cape Dutch, Victorian or any other revivalist or period style will not be approved



Figure 49: Typical plan arrangement on a Band B erf (about 880 m²).

- Houses must step with the slope. Ground floor platforms may not be raised more than 1,0 m above NGL at any point [PROPOSED]. This is especially important on the erven along the ridge line (approximately Erven 4, 5, 22, 23, 44, 62 and 69 on the marked-up SDP).
- Down-slope retaining walls and terrace edges: max. 1,5 m high, including any balustrade. Higher changes in level must be stepped with at least 1,5 m between terraces.
- Up-slope retaining walls: max. 3,5 m high within 6,5 m of the house; beyond that, 1,5 m terraces.

• "Terraforce" or "Loffelstein" type retaining blocks are not allowed where visible.
• Finishes: plastered and painted masonry to match the house, dressed natural stone, stone-filled gabions or planted earth banks (slope 1:1 to 1:2, max. 1,5 m high).

The streetscape is designed as a green, tree-lined avenue with hedges (Master Landscape Plan). Boundary treatment must support this.

- Erf 80 (Conservation area) and private open space Visually open fence (charcoal ClearVu or palisade), max. 1,8 m, planted on the inside, or a low dry-stone wall up to 1,0 m. No tall solid walls.

- Street edge boundary: Hedge or indigenous planting from the palette; optional open fence (charcoal ClearVu or palisade) max. 1,2 m behind it. A walled entrance or car court is allowed [PROPOSED]: rendered or stone walls max. 1,8 m with a timber-slatted gate, for max. 40% of the frontage and at least 1 m behind planting. Low dry-stone walls up to 1,0 m are allowed



Render – tree-lined street with grass-block tracks and planted verges

Figure 50 - 53: Reference images: boundaries, entrances & outdoor areas



Render – entrance court: timber-slatted gate and rendered walls set behind indigenous planting



Render – street edge: planting up to the road, garage with horizontal timber door



Conceptual render – low dry-stone walls along erf boundaries, with fynbos flowing between houses



Typical 3D views (JdV)

14. Heritage Impact Assessment

Heritage considerations for this proposed development relate only to palaeontology; botanical and terrestrial biodiversity; and visual aspects. These have all been undertaken as specialist studies and should be read in full for the impact assessments and related impact assessment tables. The outcomes are summarised hereunder, without detailed referencing for ease of reading.

14.1 Palaeontological impacts

The intensity or magnitude of impact relates to the palaeontological sensitivities of the affected formations and the volume of disturbance by excavation.

The proposed development involves trenches for conventional housing foundations (~0.6 m depth) and services infrastructure (up to ~1.2 m depth) and will primarily affect the capping calcrete and immediately underlying sands of the Waenhuiskrans Fm.

The fossil bones that may occur in the Waenhuiskrans Fm. in the Project Area are expected to be of later Quaternary age, between ~160 to ~100 ka and therefore mainly comprised of representatives of the extant (living) fauna, but unexpected species may occur, as a result of phases of different ecological and palaeoclimatic conditions in the past, as well as the bones of some species which became extinct in the geologically-recent past.

The later Quaternary fauna is fairly well known from archaeological sites and hyaena bone accumulations and additional finds are considered to be of moderate scientific importance, *i.e*. formations known to contain palaeontological localities and that have yielded fossils that are common elsewhere, and/or that are stratigraphically long-ranging, would be assigned a **MODERATE** rating.

Being on a topographically-elevated ridge crest the site has a reduced probability of fossil bones being relatively common as a local water source such as a spring or vlei as a focal point for herbivores and their predators is unlikely to have been present. Hyaena burrow lairs could occur, but these are often located on the eroding slopes of aeolianite ridges where the calcrete carapace is incised and burrowing out a cavity in the softer material beneath it is possible. The fossil bones in a hyaena burrow will be considerably younger that the age of the calcreted aeolianite.

14.2 Botanical & Terrestrial biodiversity

There is a disjuncture between the site's designation as a Critical Biodiversity Area 1, largely critically endangered and Highly threatened; and its designation for urban development within the urban edge.

The site's northern and western parts are contiguous with the natural habitat on the adjoining RE/281 (from which it was originally subdivided). Its contribution to landscape connectivity depends on that contiguity: habitat retained along the western and northern boundaries maintains a connection with RE/281, whereas habitat retained as isolated patches within the development would not.

The Struisbaai Conservation Master Plan (not official but a working plan) proposes the following on RE/281, Paapekuilsfontein:

Conservation areas of approximately 248 ha and 79 ha (approximately 327 ha in total), adjoining Erf 3495 to the north and west and extending westwards towards the protected areas of Agulhas National Park;

A proposed Energy Platform / Solar facility of approximately 62 ha and a proposed Residential & Light Industrial & Storage area of approximately 43 ha on the northern part of RE/281;

The proposed 'The Ridge' residential development of approximately 5.2 ha, south-west of Erf 3495.

Erf 3495 is shown as an 'Active EA' application. The Master Plan places the Erf 3495 development within a strategic, landscape-scale framework in which most of the natural habitat on RE/281 would be conserved.

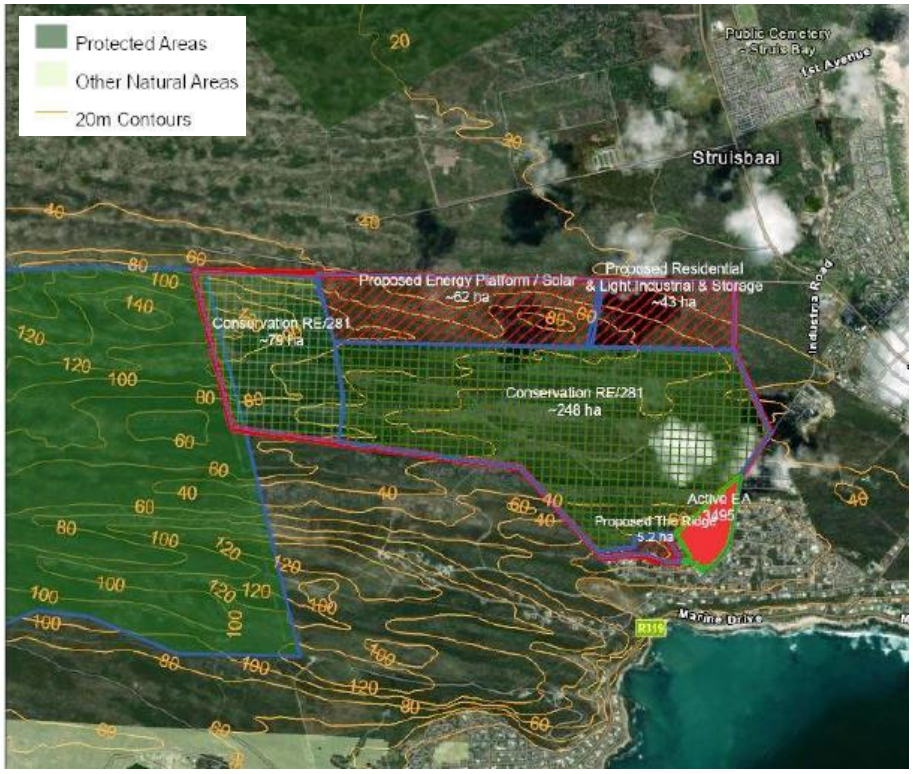


Figure 54: Proposed Struisbaai Conservation Master Plan

Construction Phase

<u>*Direct loss of vegetation and habitat*</u>**.** Development of the residential erven, streets and services would result in the total and permanent loss of the Agulhas Limestone Fynbos on the development footprint: 10.16 ha for Alternative 1 and 8.15 ha for Alternative 2. Alternative 2 avoids 1.9 ha more habitat than Alternative 1 and retains it as a single block contiguous with RE/281. The impact before mitigation is **High Negative** for both alternatives. After mitigation the impact for Alternative 1 remains **High Negative**, whereas for Alternative 2 it is **Medium Negative**

<u>*Loss of plant Species of Conservation Concern (SCC*</u>**).** Plants of *Mimetes saxatilis* (EN), *Leucospermum patersonii* (VU) and other limestone endemics on the development footprint would be lost. *M. saxatilis* cannot be transplanted, so search and rescue is not a mitigation measure for this species. The impact is **High Negative** before mitigation for both alternatives and remains **High Negative** for Alternative 1. For Alternative 2 it is reduced to **Medium Negative**, provided that a pre-construction census of *M. saxatilis* is undertaken and the layout is refined to retain the densest stands where feasible.

Operational Phase

<u>Fragmentation and disruption of ecological processes.</u> The retained habitat would be affected by edge effects, the exclusion of fire, trampling, dumping, pets and the spread of the Argentine ant. In Alternative 1 the Nature Conservation Area is a narrow band enclosed by erven, which is unlikely to remain functional; the impact is **High Negative**, reduced to **Medium Negative** with mitigation. In Alternative 2 the Nature Conservation Area has one developed edge and remains connected with RE/281; the impact is **Medium Negative**, reduced to **Low Negative** if Erf 80 is managed together with the adjoining conservation area on RE/281

<u>*Alien invasive plants.*</u> Both the No-Go alternative and the development alternatives carry a **Medium Negative** risk of further

alien invasion. With an alien clearing programme as a condition of the development, the impact is reduced to **Low Negative** for both alternatives. In the No-Go alternative there is no responsible party for alien clearing and the impact remains **Medium Negative**

Cumulative impacts
Agulhas Limestone Fynbos at Struisbaai is under pressure from the westward expansion of the town. In addition to Erf 3495, the Struisbaai Conservation Master Plan (a working plan for this project) proposes The Ridge (5.2 ha), an energy platform (approximately 62 ha) and a combined residential, light industrial and storage area (approximately 43 ha) on RE/281. Together with Erf 3495, these would remove in the order of 115–118 ha of natural habitat, much of it Agulhas Limestone Fynbos in CBA1.

Without secured conservation of the remaining habitat on RE/281, the cumulative impact of the Erf 3495 development is **High Negative** for Alternative 1 and **Medium Negative** for Alternative 2. If the conservation areas of the Master Plan (approximately 327 ha) are formally secured and managed, the cumulative impact would be reduced to **Medium Negative** for Alternative 1 and **Low Negative** for Alternative 2.

Residual impacts, biodiversity offset and the Struisbaai Conservation Master Plan
Residual impacts are those that remain after mitigation. For Alternative 1 the residual impacts are **High Negative**. For Alternative 2 the residual impacts on Agulhas Limestone Fynbos [CR], the CBA1 and *Mimetes saxatilis* (EN) are **Medium Negative**. A residual Medium Negative impact on a Critically Endangered ecosystem and a CBA1 is the level at which a biodiversity offset must be considered in terms of the National Biodiversity Offset Guideline (DFFE, 2023) and the Western Cape guideline on biodiversity offsets (DEA&DP, 2015). On-site mitigation cannot reduce these residual impacts further, since the only scope to address the loss of the Critically Endangered vegetation on Erf 3495 is protection of equivalent habitat elsewhere.

The Struisbaai Conservation Master Plan (proposed in this project) is relevant to this. From a botanical perspective, it has the attributes of a landscape-scale offset:

The proposed conservation areas (approximately 327 ha) are in the order of 40 times the development footprint of Alternative 2 (8.15 ha);

They are contiguous with Erf 3495 and with the Nature Conservation Area of Alternative 2, and comprise the same vegetation type, Agulhas Limestone Fynbos, on the same limestone substrate (on the basis of the VEGMAP and the author's surveys at The Ridge and on RE/281);

They would secure the connection between the urban edge at Struisbaai and the protected areas of Agulhas National Park, which is the principal function of the CBA1 in this area.

However, the Master Plan can only take the place of a biodiversity offset for Erf 3495 if the following conditions are met:

1) The conservation areas must be legally secured in perpetuity, for example by declaration as a nature reserve or protected environment, a biodiversity stewardship agreement with CapeNature, or incorporation into Agulhas National Park, with a title deed restriction.
2) A management plan with a responsible management authority and secured funding (alien clearing, fire management, access control) must be in place.
3) The conservation areas, ecological corridors and feeder areas must be shown explicitly on the final Master Plan, with their extent, and the vegetation and SCC of the conservation areas must be verified in the field in the appropriate season.

4) The securing of the conservation areas must be tied to the authorisation of Erf 3495 so that it is in place before, or at the same time as, the loss of habitat on Erf 3495.
5) The same conservation areas will be presented as mitigation for the other developments in the Master Plan (The Ridge, the energy platform and the residential / light industrial area). The adequacy of the conservation areas must therefore be demonstrated against the combined residual impacts of all of these developments, not Erf 3495 alone.

Consistent with the approach of the faunal specialist (Venter, pers. comm., 2026), the site-level impact ratings in this report are retained, and the Conservation Master Plan is presented as an additional landscape-scale mitigation measure. The determination of whether the Master Plan is an adequate substitute for a biodiversity offset for Erf 3495, and whether any further offset measures are required, rests with the competent authority, informed by CapeNature and SANParks during the public participation process. From a botanical perspective, the Master Plan can be supported as the appropriate mechanism to address the residual impacts of Alternative 2, provided that the conditions above are met.

14.3 Visual implications of the proposed development

It is noted that the visual impacts have not been modelled by the development team with visual simulations of the viewpoints identified, and there are discrepancies between the architectural guidelines and the landscape master plan. The latter is also an insufficiently developed response to the botanical and visual sensitivities of this site. This has restricted the extent of verifiable impact assessment.

Both the Construction and Operational phases of the project will effect noticeable changes (i.e. visual impact) to the visual status quo. These are summarised as follows, and may have negative, neutral or positive visual impact effects on the resources identified.

Construction phase

- Site clearance and removal of fynbos for roads, services and building platforms
- Earthworks and excavations for roads, services and stormwater
- Construction operations: site establishment, materials delivery and storage
- Building activity, personnel and vehicles (visibility of machinery and site camp), extending over a long period as individual erven are built
- Noise, dust, temporary lighting, temporary services and hoarding

Operational phase

- Transformation of the site from natural fynbos to residential (change in sense of place)
- New houses, gardens, walls and associated landscape on the crest of the rise
- Residential activities and passive recreational use of the open space
- Increased traffic on Adelle Street and Noreen Street
- Lighting at night

Note:
Whereas many construction phase impacts are significant and immediate, effecting noticeable change to the status quo, they last only for as long as construction activity continues. Operational phase impacts tend to be more permanent and long-lasting, but may become neutralized over time, as the visual changes become alleviated through the implementation of appropriate mitigation measures, and the maturing of landscape.

As a function of landscape sensitivity, the anticipated magnitude of change as a result of the development, the sensitivity to visual change is deemed to be of Moderate Significance.

Considering the low vegetation and the elevated, open landform, the Visual Absorption Capacity of the site is Low to Moderate. The capacity is not uniform: the southern and eastern parts of the development area adjoin existing houses and have a moderate VAC, while the northern edge at the brow of Erf 80 has a low VAC, as built form here is seen against the sky. The VAC will improve as the landscape planting matures.

The development will occupy natural fynbos and will form a continuation of the existing residential fabric. New development will fit partially into its surroundings, drawing on the scale and grain of the town, but will be noticeable due to the transformation of the site from natural to built. The development is therefore considered to have Moderate Visual Intrusion.

As a function of receptor sensitivity and the anticipated magnitude of change, the significance of the anticipated visual impacts is deemed to be **Moderate**. Mitigation, through height control on the exposed edges, the colour and form controls of the Architectural Guidelines, and landscape treatment, will be required.

The VIA identifies a number of sensitive viewpoints and, given that the visual impacts have not been modelled by the development team. , the VIA provides a preliminary assessment of each:

VP1: Highly visible, High visual intrusion for the immediate neighbours. This viewpoint is the main test of the southern double storey zone. Erven 10 to 16 sit on relatively high ground directly behind the existing houses, and the simulation should establish whether double storey houses here would loom over the existing erven to the south.



Figure 55: Identified view points for impact assessment (Terra+)

VP2: Preliminary assessment: Highly visible, Moderate to High visual intrusion. The change is the conversion of an open edge into a residential street front; this is consistent with the existing pattern of the

street but represents a clear loss of the natural outlook from the residents opposite.

VP3: Highly visible, Moderate visual intrusion. The single storey restriction on the ridge line is effective here, provided the platform and height limits are enforced.

VP4: Highly visible, Moderate visual intrusion, partly mitigated by the open space corridor. This viewpoint demonstrates the value of the servitude corridors as view lines and green links, and their planting should remain low and open rather than forming a dense avenue.

VP5: Highly visible, Moderate to High visual intrusion. The interface with Erf 80 requires the visually open boundary treatment, natural planting on the erf edges and the 3 m building line proposed in the guidelines.

VP6**:** Visible, Moderate visual intrusion, potentially Moderate to High if the northern row breaks the skyline. This is the key viewpoint for the northern double storey zone. The Architectural Guidelines place double storey houses here on the basis that they are less likely to block views from other erven within the estate; from outside the estate, however, this row is the most exposed edge of the development. The simulation must establish whether the upper floors would be seen against the sky from Karen Street and Frances Street.

VP7:
Visible, Low to Moderate visual intrusion for the Preferred Layout; High for Alternative 1. This viewpoint best illustrates the benefit of retaining Erf 80.

VP8:
Partially visible, Low to Moderate visual intrusion [to be confirmed by simulation]. The key consideration is whether the development reads as a contained extension of the town or as a new built skyline on the rise.

VP9: Low visibility, Low visual intrusion [to be confirmed by simulation]. At this distance the development is absorbed with in the townscape, provided roofs are dark and matt.

VP10: Low visibility, Low visual intrusion. The colour controls (warm off-white rather than brilliant white, dark matt roofs) are relevant at this distance.

VP11: Low visibility, Low visual intrusion [to be confirmed by simulation].

Night views: The site is currently dark at night, and forms part of the dark edge between the lit town and the natural plain. The development will add domestic and street lighting to the crest. A night simulation from Viewpoints 6 and 8 is recommended to illustrate the effect of the lighting controls in the Architectural Guidelines.

Planning, Design and Development Phase Visual Impacts

Nature of Visual Impacts

Negative visual impacts may be expected during the construction stage of the project, resulting directly from site establishment, clearance of fynbos, and earthworks for roads, services and building platforms, with construction vehicles, materials delivery and building activity causing noise, dust and temporary lighting and hoarding impacts.

Extent of Visual Impacts

The geographic area of influence of the construction visual impacts is of a local extent, limited to the site and the adjoining streets, with construction activity on the northern edge visible from the lower ground to the north.

Duration of Visual Impacts

The construction of roads and services is of short-term duration. The construction of individual houses, however, is likely to continue

intermittently over several years as erven are sold and developed, and the overall duration is therefore short to medium-term.

Intensity of Visual Impacts
The visual impacts of construction are deemed to be of medium intensity, given the clearance of fynbos on an elevated and open site, before mitigation and landscape establishment can take effect.

Probability of Visual Impacts
The visual impacts are highly probable: construction activity, vegetation clearance and associated disturbance will occur regardless of any prevention measures.

Level of Confidence in Prediction of Visual Impacts
Based on the Site Development Plan, the Architectural Guidelines, the Master Landscape Plan and the site visits undertaken, the level of confidence in this prediction is high.

Significance of Construction Phase Visual Impacts before Mitigation
Determined through a synthesis of the nature, duration, intensity, extent and probability of the impact, the Construction Phase Visual Impacts of the Preferred Layout are of medium adverse significance.

Significance of Construction Phase Visual Impacts after Mitigation
Following mitigation (limiting clearance to roads, services and individual construction zones, protection of Erf 80 and the open space, dust and hoarding management, topsoil and plant rescue, and progressive rehabilitation), the significance of the impact is reduced to low adverse significance.

Operational Phase Visual Impacts

Nature of the Visual Impact
Should the Preferred Layout be implemented, negative impacts are expected in terms of the extension of the town onto the crest of the rise, the loss of natural fynbos, and the visual intrusion of houses into the outlook of the adjoining residents. Should the layout be implemented together with the Architectural Guidelines, the Landscape Plan and the additional measures recommended in this report, the impact may be improved from moderate negative to low to moderate negative. Positive aspects include the retention of the northern slope as a 3.96 ha conservation area, and the clear and contained edge that the development will give to the town.

Extent of Visual Impacts
The geographic area of influence of the operational visual impacts is local, extending to the adjoining residential areas, the lower ground to the north and north-east, and parts of the R319 approach from L'Agulhas.

Duration of Visual Impacts
The operational visual impacts are of long-term or permanent duration, although their intensity is expected to reduce over time as the landscape planting matures.

Intensity of Visual Impacts
The magnitude of the operational visual impacts is of medium intensity, given the scale and grain of the development relative to the existing town, and its position on the crest.

Probability of Visual Impacts
The probability of the visual impacts occurring is definite once the development is built.

Level of Confidence in Prediction of Visual Impacts
Based on available information, the level of confidence in the prediction is medium to high. Confidence in the effect of the double storey zones on the northern and southern edges will be confirmed by the simulations from Viewpoints 1, 2, 6 and 7.

Significance of Operational Phase Visual Impacts before Mitigation
Determined through a synthesis of the nature, duration, intensity, extent and probability of the impact, the Operational Phase Visual Impact of the Preferred Layout is of **moderate adverse** significance, having a noticeable influence on the visual environment and requiring specific mitigation.

The Operational Phase Visual Impact of Alternative 1 is of high adverse significance, as it would place houses on the steep northern slope, the most visible part of the site, and reduce the conservation area by half.

Significance of Operational Phase Visual Impacts after Mitigation
Following the implementation of the mitigation measures recommended in this report (height control on the exposed edges, the form, colour and lighting controls of the Architectural Guidelines, locally indigenous landscape planting, and retention of Erf 80), the Visual Impact of the Preferred Layout is **reduced to low to moderate negative significance**, having a notable but acceptable influence on the environment.

Residual Impact
With the mitigation measures set out below, the Planning, Design and Construction Phase visual impact is reduced from medium adverse to low adverse significance, and the Operational Phase visual impact is reduced from moderate adverse to low to moderate negative significance. The residual impact is driven principally by the transformation of natural fynbos and by the elevated position of the site, which cannot be fully screened, but which can be brought within acceptable limits through the height, form, colour and landscape controls recommended.

Considered holistically, the visual impact of the proposed development, while unavoidable given the change in land use, should not cause undue detriment to the visual resources, environment or wellbeing of receptors in Struisbaai, provided the mitigation measures recommended in this report are implemented and maintained, and should remain within acceptable visual, heritage and environmental quality standards.

15 Mitigation

15.1 Palaeontology

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 below, to be followed during the Construction Phases.

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) 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 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 rescue of discovered palaeontological remains by a contracted specialist shall be at the Developer's expense.

15.2 Botanical

The main inescapable conclusion is that Erf 3495, Struisbaai supports important habitat that has high conservation value. The only way subdivision and development could be supported from a botanical and terrestrial biodiversity perspective would be to institute mitigation of similar habitat that can be included in the conservation estate.

The following mitigation measures apply to Alternative 2. They must be included in the Environmental Management Programme (EMPr).

1) A census of *Mimetes saxatilis* (and other proteoid SCC) on the development footprint and in Erf 80 must be undertaken in spring before the layout is finalised, and the boundary of Erf 80 and the adjacent erven should be adjusted to retain the densest stands where feasible.
2) Erf 80 must be zoned for nature conservation, fenced on its developed edge with fauna-permeable fencing, and protected by a title deed restriction or equivalent legal instrument. It should be incorporated into the management of the RE/281 conservation area.
3) The construction footprint must be demarcated before any clearing. No vehicles, stockpiles, spoil or construction camps may be placed in Erf 80.
4) A search and rescue of geophytes, succulents and other transplantable species must be undertaken by a suitably qualified person before clearing, with the plants used for landscaping or relocated to Erf 80 or RE/281. Seed of *M. saxatilis* and other Proteaceae should be collected for propagation by a specialist nursery.
5) Topsoil from the footprint should be stripped and re-used on road verges and public open space to retain the soil seed bank.
6) A vigorous alien invasive clearing programme must be implemented on the whole erf before construction and maintained in Erf 80 during the operational phase. Cut alien material must be removed from the site and not left *in situ*.
7) Landscaping of streets, public open space and gardens must use locally indigenous species. A list of prohibited invasive garden plants must be included in the home owners' constitution.
8) A fire management plan must be prepared in consultation with the local fire protection association and CapeNature, with firebreaks placed on the developed edge rather than in Erf 80, so that ecological burning of Erf 80 together with the adjoining RE/281 remains possible.
9) Measures to limit the spread of the Argentine ant (inspection of imported soil, plants and building material) and controls on pets and access must be included in the operational EMPr.

15.3 Visual

Mitigation: General Measures

The mitigation measures presented in this report will materially assist in the integration of the proposed development within the receiving landscape and in reducing its visual exposure. These measures must form an integrated part of the overall site management plan, be included in the Home Owners' Association constitution and title conditions, and be timed and programmed with the construction period of the development.

It is recommended that the Master Landscape Plan be developed into a detailed Landscape Plan by a Registered Professional Landscape Architect prior to construction. This plan should typically address the following:

- Existing vegetation to be retained on Erf 80, rf 78, the open space corridors and the erf edges, and the method of protection during construction
- Plant rescue and the reuse of topsoil and seed-bearing material in rehabilitation
- A planting palette of locally indigenous coastal fynbos and thicket species suited to the limestone and sand conditions and the wind exposure of the site.
- Street and open space planting that is low and open in character, so that the servitude corridors remain view lines.
- Lighting specifications for streets and the open space, including fixture shielding and colour temperature

Mitigation: Specific Measures

Phase 1: Planning, Design and Construction

- The Architectural Guidelines must be adopted as a condition of approval and enforced through the Design Review Committee.
- The northern double storey zone (Erven 1, 26 to 38, 41 and 64 to 67) and the southern double storey zone (Erven 10 to 16) must be verified through the Google Earth Pro simulations. Where double storey houses would break the skyline from Viewpoints 6 and 7, or would loom over the existing houses from Viewpoints 1 and 2, the affected erven must be restricted to single storey, or the upper floor must be set back from the slope edge so that it is not seen against the sky.
- The single storey restriction and the 1.0 m platform limit on the ridge line erven (approximately Erven 4, 5, 22, 23, 44, 62 and 69) must be retained.
- On erven bordering Erf 80, buildings must observe the 3.0 m building line, boundaries must be visually open, and the erf edge must be planted with locally indigenous species continuous with the conservation area.
- Roofs must be dark grey or charcoal and matt; walls must be warm off-white, stone or timber.
- Brilliant white walls and reflective finishes must not be permitted, particularly on elevations facing north and north-east.
- The plant palette of the Master Landscape Plan must be revised. Species not indigenous to South Africa, such as Rhaphiolepis indica and Westringia fruticosa, should be removed, and riverine and forest trees (such as Combretum erythrophyllum, Syzygium spp. and Curtisia dentata) should be replaced with species suited to the exposed coastal conditions of the Agulhas plain, in consultation with the botanical specialist. Lawn should be limited as proposed in the guidelines, and the extensive lawns and hydrangeas shown in the renders should not be implemented.
- A planted buffer of naturally occurring species should be provided on the erf edges facing the existing houses on Noreen Street and Adelle Street, where possible within the street building lines.
- Street lighting should be low-level bollard lighting only, with no lighting on the edge of Erf 80. No floodlighting, uplighting or coloured lighting should be permitted.
- Clearance must be limited to the construction zone of each erf. Erf 80 and the open space must be fenced off during construction, and no stockpiling, access or dumping may take place there.

Phase 2: Operational

- Erf 80 must be managed as a conservation area, with alien clearing and fire management, and no private access, structures or clearing.

- Landscape planting must be maintained and replaced where establishment fails.
- The Design Review Committee must review all house designs, including additions and alterations, against the guidelines and the recommendations of this report.
- Lighting must be monitored for compliance with the guidelines.

16. 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 H and are summarised as follows:
…

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

17. Recommendations

It is recommended that Heritage Western Cape:

- Endorses this report as having met the requirements of Section 38(3) of the NHRA;
- In terms of Section 38(8) of the NHRA supports the proposed development on Erf 3495 on condition that:
  - The Architectural Guidelines and Landscape Master Plan should be refined/finalised to ensure congruity and to incorporate the recommendations of this report, including the Mitigations, with particular attention to the double storey zones on the northern and southern edges, the plant palette and lighting.
  - The simulations from Viewpoints 1 to 12 should be developed to enable assessment and testing of the proposed mitigation measures.
  - Once these visual simulations and a congruent, revised Landscape Master Plan and Architectural Guidelines are completed, they should be submitted to the Visual Impact Assessor for final visual impact assessment, to be submitted for ratification by HWC.
  - Final plans are generally in accordance with the layout and development guidelines for Erf 3495, Struisbaai, as shown on REV 2 Alternative 2 and included as Annexure G to this report, as mitigated, refined and supported by HWC.
  - The mitigation measures listed in Section 15 of this report are included as conditions of the Environmental Authorisation and implemented.

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	18 years heritage
Professional Registrations	APHP
B-BBEE status	Exempt Micro-enterprise (Level 5)

Key Experience / Training	Cindy Postlethwayt is a qualified Town and Regional Planner and APHP Accredited Professional Heritage Practitioner. She has 40 years experience, with a specialist focus over the last 18 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 25 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, over 80 HIAs

Section 27 and 34 applications: Lead heritage practitioner, over 50

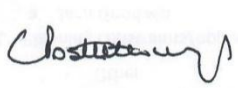
NID applications (stand alone, not part of an HIA): over 90

Appeals (HWC & Tribunal): 13

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: 3 November 2026

ANNEXURE B: HWC Response to NID

Our Ref: HM/ OVERBERG/ CAPE AGULHAS/ STRUISBAAI/ ERF 3495
Case No.: HWC23083108MS0904
Enquiries: Muneerah Solomon
E-mail: Muneerah.Solomon@westerncape.gov
Tel: 021 483 5959

ILifa leMveli leNtshona Koloni
Erfenis Wes-Kaap
Heritage Western Cape

Cindy Postlethwayt
cindy@cpheritage.co.za

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 RESIDENTIAL DEVELOPMENT ON ERF 3495, OFF ADELLE STREE 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 the Heritage Officers Meeting held on 11 September 2023.

You are hereby notified that, since there is reason to believe that Proposed Residential Development on Erf 3495, c Adelle Street, Struisbaai, will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HI 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.

(Our emphasis)
This HIA must in addition have specific reference to the following:

- PIA and VIA required.

Our Ref: HM/ OVERBERG/ CAPE AGULHAS/ STRUISBAAI/ ERF 3495
Case No.: HWC23083108MS0904
Enquiries: Muneerah Solomon
E-mail: Muneerah.Solomon@westerncape.gov
Tel: 021 483 5959

ILifa leMveli leNtshona Koloni
Erfenis Wes-Kaap
Heritage Western Cape

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.

Please note, should you require the HIA to be submitted as a Phased HIA, a written request must be submitted to HWC prior to submission. HWC reserves the right to determine whether a phased HIA is acceptable on a case-by-case basis.

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.

Waseela 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: Botanical & Terrestrial Biodiversity Impact Assessment

(included as a separate e-file)

ANNEXURE E: Visual Impact Assessment

(included as a separate e-file)

ANNEXURE F: 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 G: Development proposal

(included as a separate e-file)

ANNEXURE H: Public participation

(to be included as a separate e-file)