HWC Case No: 19060703LB0613E

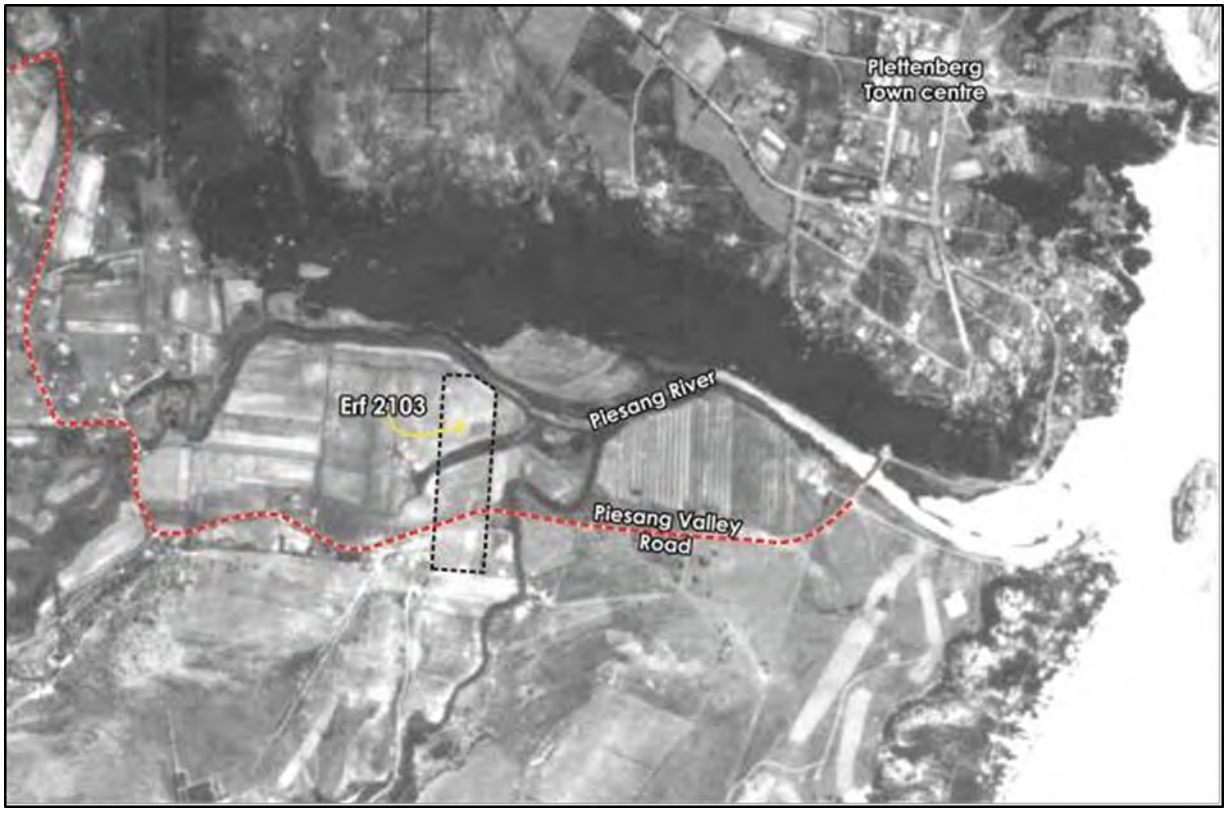
APPENDIX 4

ARCHAEOLOGICAL IMPACT ASSESSMENT: ERF 2103, PLETTENBERG BAY, BITOU MUNICIPALITY, WESTERN CAPE PROVINCE

(Assessment conducted under Section 38 (4) of the
National Heritage Resources Act No 25 of 1999)

Prepared for: Saskia Vogel

September 2019



Prepared by:

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EXECUTIVE SUMMARY

Site Name: Erf 2103, Piesang Valley Road, Plettenberg Bay, Bitou Municipality, Western Cape Province.

Location: Erf 2103 is located on the lower reaches of the Piesang River valley, about 1km southwest of the Plettenberg Bay historic town centre, and 1,3km west of the coast. The rectangular shaped property is situated to the north (2,9ha in extent) and south (1,1ha in extent) of the Piesang Valley Road.

Description of Proposed Development: The proposed development comprises three components that relate to the northern and southern portions of the Erf (i.e. to the north and south of the Piesang Valley Road, respectively), as outlined below:

- An Environmental Authorization (EA) of the construction of a residential dwelling and associated outbuildings on the northernmost portion of Erf 2103 was granted by the DEA&DP on 17th September 2018 (Attached as **Annexure 7**). This proposal triggered a NEMA process due to the proximity of the site to a river course, namely the Piesang River. A site plan and approved architectural plans for the residential building are attached as part of Annexure 2. It is important to note that after issuing of the EA, and at the time of submission of the NID by Perception Planning (June 2019), a further proposal for an additional "pedestrian bridge" would have triggered another NEMA process. A recent decision by the landowner (September 2019) to <u>omit said pedestrian bridge</u> means that no further NEMA process would be required for this or the two other components of the proposed development outlined herein;

This submission to HWC is therefore a Section 38(4) application:

- The **second component** of the proposed development entails the following:
  a) Subdivision of Erf 2103, Plettenberg Bay along southern boundary of Piesang Valley Rd;
  b) Rezoning of newly-created portion of Erf 2103, Plettenberg Bay, south of Piesang Valley Rd to Business Zone I for the purposes of a mixed-use development including retail, a restaurant, parking and accommodation as part of a new two-storey over basement building as illustrated on the site plan and architectural proposals attached as part of Annexure 2;
  c) Consent Use so as to accommodate to above residential-orientated use within Business Zone I.
- The **third component** of the proposed development would entail the following:
  a) Consolidation of a newly-created portion of land (±2,182m² in extent, subdivided from adjoining Erf 8212, Plettenberg Bay) with Erf 2103, Plettenberg Bay;

b) Rezoning of the Remainder of Erf 2103, Plettenberg Bay, situated north of the Piesang Valley Road, (together with consolidated portion of Erf 8212, Plettenberg Bay) to Single Residential Zone I;
c) Departure for relaxation of building lines for the construction of a new guard house
d) Departure from the Bitou Municipality Fences and Fencing Bylaw so as to allow for new boundary fencing to a height of 2,1m above NGL.

Comment of the Heritage Authority (Heritage Western Cape)
A Notice of Intent to Develop was submitted to HWC by Perception Planning and the following comment received on the 27 June 2019:

You are hereby notified that, since there is reason to believe that the proposed consolidation and re-development of the site, Erf 2103, Plettenberg Bay, will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA be submitted. This HIA must have specific references to the following:

-An Archaeological Impact Assessment

The required HIA must have an integrated set of recommendations.

The comments of relevant registered conservation bodies and the relevant Municipality muse be requested and included in the HIA where provided. Proof of these requests must be supplied.

Identified Archaeological Resources:
A survey of the Erf was conducted on 4 August 2019. No archaeological resources were identified on the northern or southern portions of the site.

- A small dump of rough quartzite cobbles was recorded on the northern portion, including one possible core/chunk. This seems to have been introduced to the site fairly recently. However, a nearby large hole excavated 1-2m below the surface, contained no stone cobbles;
- Aerial images suggest a structure on the southern portion of the Erf dating between 1942-1958 which was subsequently demolished. Remnants of a garden (including walling) was identified on the southern portion, but the outlines of the demolished structure could not be traced under the dense grass cover. No historical archaeological artefacts were identified.

Anticipated Impacts on the Archaeological Resources:
No impacts are expected.

Comments from Interested and Affected Parties:
The Simon van der Stel Foundation commented:

- *As there will be no destruction of cultural landscape or other heritage resources, and since the development will be in accordance with local government requirements, this conservation body does not oppose the development.*

The Comments of the Simon van der Stel Foundation are noted

The Bitou Municipality commented:

- *Although the Plett Historical Society are not registered as a conservation body they will most likely be interested and affected parties with regards to heritage concerns within Plettenberg Bay and it is suggested that they be given the opportunity to provide comments on the assessment and proposal.*
- *Although the adjacent areas east of the property have been developed in the past the rural characteristic and sense of place that presides as you enter Plettenberg Bay via Piesang Valley Road is still mostly intact and should be endeavored to be conserved.*
- *No solid fencing should be used as this will inhibit the current open views to the Piesang River and detract from the rural sense of place. Visually permeable fencing, such as "clear view" fencing, should be utilized. The Bitou Municipal Fencing and Fences By-Law (2009) should be consulted and complied with.*
- *It is strongly suggested that only indigenous plant species endemic to the greater Plettenberg Bay area be utilized for all landscaping purposes. A landscaping guideline with an endemic*

plant list should be formulated and approved for the proposed development. This is to ensure that no exotic trees (such as Palm trees) be planted which may detract from the visual rural sense of place.

- *The additional potential pedestrian bridges over the tributary are questioned. This will not be in line with principles established in the Piesang River Estuary Management Plan resulting in further canalization and barriers within the system. Ideally this tidal tributary is to be restored to as near natural as possible.*

Response to the Comments from Bitou Local Municipality:

- The PPP pertaining to this application preceded HWC's most recent Public Consultation Guidelines, 2019. While the local planning authority and registered conservation body was therefore notified of the proposal, there was no obligation to notify the Plett Historical Society. We would encourage the Plett Historical Society to register as a conservation body with HWC in terms of Section 25 of the NHRA;
- Comments regarding the rural sense of place along the Piesang Valley Road are noted. It is submitted that the development to the north of the road (residential dwelling) has already been approved by the Department of Environmental Affairs & Development Planning. The proposed development to the south of the road is of a similar size to that of the brewery which was recently approved on the adjoining Erf 2104 by Bitou Municipality and which is currently under construction. Detailed design aspects pertaining to any future development on the southern portion of Erf 2103 will be dealt with as part of the land use planning application to follow;
- Comments regarding permeable fencing are noted. A recommendation in support of provision of visually permeable fencing along the subject property boundaries have therefore been included in the HIA. Furthermore, it is noted that any future fencing could be undertaken in accordance with the requirements of the Bitou Municipal Fencing and Fences By-Law (2009);
- Comments regarding the use of endemic plants for the landscaping of the development are noted. An Environmental Management Plan was undertaken for the property as part of the previous EIA process for construction of the dwelling on the northern portion of Erf 2103 and included in Section 7.14 of the EMP (Rehabilitation and Botanical Concerns);
- With respect the last bullet point, the developer has decided to omit the pedestrian bridge from the proposal and therefore no impacts will occur.

Note that a thorough Public Participation Process was conducted in terms of NEMA for the first phase of the development, namely the construction of the residential dwelling on the northern portion of Erf 2103, see attached Environmental Authorisation (**Annexure 7**).

Recommendations

The standard clause applies:

- If during ground clearance or construction, any archaeological material or human graves are uncovered, work in that area should be stopped immediately and the ECO should report this to Heritage Western Cape (Tel: **021 483 9689**). The heritage resource may require inspection by the heritage authorities, and it may require further mitigation in the form of excavation and curation in an approved institution.

Further, with regard the comments of the Bitou Local Municipality, it is recommended that the developer take note of the comments regarding permeable fencing and consult the Bitou Municipal Fencing and Fences By-Law (2019).

Author and Date

Lita Webley September 2019

Archaeologists/Heritage Specialists
Lita Webley is an archaeologist (PhD from the University of Cape Town 1992) and has been conducting Heritage Impact Assessment and archaeological specialist studies in the Western Cape, Northern Cape and Eastern Cape Provinces since 1996. She is a member of the Archaeology, Palaeontology and Meteorites Committee and the Impact Assessment Committee of Heritage Western Cape (HWC), the Provincial Heritage Resources Authority. She is accredited member of the Association of Professional Heritage Practitioners (APHP) and is an accredited Principal Investigator of the Association of Southern African Professional Archaeologists (ASAPA) CRM section as follows:

- Principal Investigator: Stone Age, Shell Middens and Colonial Period; and
- Field Director: Grave Relocations.

SPECIALIST DECLARATION
I, Lita Webley, 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 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 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 offense in terms of regulation 71 and is punishable in terms of section 24F of the Act.

Signature of specialist

Specialist Field: Archaeology and Heritage

CONTENTS

1. INTRODUCTION 8
1.1 Project Description 8
2. TERMS OF REFERENCE 10
3. LEGISLATIVE BACKGROUND 11
3.1 Grading 11
3.2 NID Response 12
4. METHODOLOGY 12
4.1 Literature Survey 12
4.2 Field Survey 12
4.3 Assumptions and Limitations 12
5. SITE DESCRIPTION 13
5.1 Archaeological Background Plettenberg Bay 15
5.2 Pre-colonial Burials 16
5.3 Historical Background Plettenberg Bay 16
5.4 Background to Erf 2103 18
6. ARCHAEOLOGICAL FINDINGS 19
7. IMPACT ASSESSMENT 23
8. MITIGATION 23
9. PUBLIC PARTICIPATION 24
9.1 Response to Comments Received 24
10. RECOMMENDATIONS 25
11. REFERENCES 26

ANNEXURES

Annexure 1: PoA, Title Deed and S.G. Diagrams for Erf 2103
Annexure 2: Conceptual site development plan, floor plans and preliminary three-dimensional views.
Annexure 3: HWC Interim Comment on the NID
Annexure 4: AIA Report (this report)
Annexure 5: Public Participation Comments on the HIA
Annexure 6: Site Photographs
Annexure 7: Environmental Authorisation

FIGURES

Front Page: A 1942 aerial image of Plettenberg Bay showing the project area.
1 Study area location on the southern banks of the Piesang River
2 Erf 2103
3 Location of CRM studies referred to in the text.
4 A map entitled “Plan of Plettenberg Bay on the south coast of Africa” 1801.
5 Approximate location of Erf 2103 in relation to original loan farm Brakkloof.
6 The Survey Diagram dating to **1907** for the Farm Brakkloof 443.
7 Survey tracks recorded with GPS during the survey of the 4th August.

IMAGES

1. View from the south, northward across the northern portion of the Erf
2. Pasture on the northern section of the Erf
3. The tributary which divides the northern section of the Erf

4. The Piesang River which forms the northern boundary
5. View southward, from the Piesang Valley Road.
6. Large concrete slab on northern portion of Erf
7. Circular hole on northern portion
8. Heap of quartzite stones, including one possible chunk/core
9. Remnants of garden on southern portion of the Erf

TABLES

1. Grading of heritage resources
2. Impact Assessment

GLOSSARY

Archaeology: Remains resulting from human activity which is in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures.

Heritage: That which is inherited and forms part of the National Estate (Historical places, objects, fossils as defined by the National Heritage Resources Act 25 of 1999.

Heritage Western Cape: The heritage authority in the Western Cape Province.

National Estate: The collective heritage assets of the Nation

Structure (historic:) Any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith. Protected structures are those which are over 60 years old.

Abbreviations and Acronyms

AIA	Archaeological Impact Assessment
APM	Archaeology, Palaeontology and Meteorites Committee of Heritage Western Cape
BID	Basic Information Document
CRM	Culture Resource Management
ESA	Early Stone Age
ECO	Environmental Control Officer
GPS	Global Positioning System
HIA	Heritage Impact Assessment
HWC	Heritage Western Cape
IACOM	Impact Assessment Committee of Heritage Western Cape
LSA	Later Stone Age
MSA	Middle Stone Age
NHRA	National Heritage Resources Act, No 25 of 1999
NID	Notice of Intent to Develop
SAHRA	South African Heritage Resources Agency

1. INTRODUCTION

Lita Webley was appointed by Ms Saskia Vogel (the property owner), to undertake an Integrated Heritage Impact Assessment (HIA) comprising an Archaeological Impact Assessment (AIA), in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act 25 of 1999) with relation to proposed development of the subject property. The Power of Attorney and S.G. Diagrams are attached as part of **Annexure 1**.

The cadastral land unit subject to this application is as follows:
Erf 2103, Plettenberg Bay measuring 4.0446 ha, registered to Saskia Vogel, held under Title Deed T73487/2017 and situated within the jurisdiction of Knysna District and Bitou Municipality.

Figure 1: Study area location shown as red polygon on the southern banks of the Piesang River, Plettenberg Bay (Google Earth, 2018).

1.1 Project Description

The property is situated within the lower reaches of the Piesang River valley, ±1km directly southwest of the Plettenberg Bay historic town centre and ±1.3km west of the coastline/ Indian Ocean (**Figure 1**). Extending southward from the Piesang River, which defines the northern cadastral boundary, the rectangular-shaped Erf 2103 is also traversed by the Piesang Valley Road (**Figure 2**). The property is therefore effectively divided into two portions, namely the **northern portion** (±2,9 ha in extent) and the **southern portion** (±1,15 ha in extent). Access to both portions of Erf 2103 is directly off the Piesang Valley Road.

Figure 2: Erf 2103 indicates the Piesang River to the north, the small remnant tidal channel which crosses the erf from west to east, and the southern section below the Piesang Valley Road.

According to conceptual architectural drawings provided by Scott & Partners, the proposed development would essentially consist of three components that relate to the northern and southern portions of Erf 2103, as outlined in in the conceptual site development plan (**Annexure 2**):

1.1.1 First component: residential dwelling and outbuildings

Permission was granted on 17th September 2018 by the Department of Environmental Affairs & Development Planning (DEADP) for construction of a dwelling and associated outbuildings on the northernmost portion of the property, within 32 metres of a natural watercourse (being the Piesang Valley River) after conclusion of an EIA process[1] (Figure 3). A copy of the environmental authorisation is attached as **Annexure 7**. The building plan for the dwelling on the northern portion of the study area, has been approved by DEA&DP whilst detailed municipal drawings will be submitted to the Bitou Municipality for approval in due course.

It is important to note that after issuing of the EA (Annexure 7 attached), and at the time of submission of the NID by Perception Planning (June 2019), a further proposal for an additional "pedestrian bridge" would have triggered another NEMA process. A recent decision by the landowner (September 2019) to omit said pedestrian bridge means that no further NEMA process would be required for any component of the proposed development outlined herein. **This application is therefore a Section 38(4) and not a Section 38(8) as initially indicated in the NID application by Perception Planning.**

[1] DEADP Ref. 16/3/3//1/D1/13/0004/18

1.1.2 Second Component: Mixed use development

This land use planning application to be submitted to Bitou Municipality is essentially for the subdivision of Erf 2103 into two properties along the southern boundary of the Piesang Valley Road and rezoning of the newly-created erf south of said for so as make provision for a new mixed use development. This application would entail the following (also refer to table outlining proposed land use below):

a) Subdivision of Erf 2103, Plettenberg Bay along southern boundary of Piesang Valley Rd;
b) Rezoning of newly-created portion of Erf 2103, Plettenberg Bay, south of Piesang Valley Rd to Business Zone I for the purposes of a mixed-use development including retail, a restaurant, parking and accommodation as part of a new two-storey over basement building as illustrated on the site plan and architectural proposals attached as part of Annexure 2;
c) Consent Use so as to accommodate to above residential-orientated use within Business Zone I.

Building Level	Proposed Use	Approx surface area (m²)
Ground Floor	Restaurant Retail Parking Technical Parking entrance Plaza – Pedestrian access	153 462 1,185 (29 bays) 55 - -
First Floor	Villa B (3 bedroom) Parking entrance Parking Office Restaurant	300 - 1,847 (39 bays) 529 153
Roof Floor	5 x 2 Bedroom units 10 x Private gardens 5 x 3 Bedroom units Access Road Pedestrian circulation Pool garden	104 (each) 40 159 (each) - - 835

The conceptual site development plan, floor plans and preliminary three-dimensional views are attached as **Annexure 2** to this report.

1.1.3 Third component: Single residential zoning

This land use planning application to be submitted to Bitou Municipality is essentially for realignment of existing river frontage by consolidating a portion of the adjoining Erf 8212 into Erf 2103 as well as rezoning of the property for single residential purposes. This application would entail the following:

e) Consolidation of a newly-created portion of land (±2,182m² in extent, subdivided from adjoining Erf 8212, Plettenberg Bay) with Erf 2103, Plettenberg Bay;
f) Rezoning of the Remainder of Erf 2103, Plettenberg Bay, situated north of the Piesang Valley Road, (together with consolidated portion of Erf 8212, Plettenberg Bay) to Single Residential Zone I;
g) Departure for relaxation of building lines for the construction of a new guard house;
h) Departure from the Bitou Municipality Fences and Fencing Bylaw so as to allow for new boundary fencing to a height of 2,1m above NGL.

2. TERMS OF REFERENCE

Specifically, the terms of reference are:

- The identification of all archaeological remains (including ruined structures older than 100 years as well as cemeteries/graves) within the footprint of the study area;
- The assessment of significance of the archaeological resources as set out in Table 1;
- Assess the potential impacts of the proposed development on the archaeological resources using the prescribed format;
- Propose suitable mitigation measures to minimise possible negative impacts to the archaeological resources, if applicable;
- Provide a report that will meet the requirements of the heritage authorities;
- Provide input into the Environmental Management Program.

3. LEGISLATIVE BACKGROUND

The basis for all heritage impact assessment is the National Heritage Resources Act 25 (NHRA) of 1999, which prescribes the manner in which heritage is assessed and managed.

The NHRA has defined certain kinds of heritage as being worthy of protection, by either specific or general protection mechanisms. In South Africa the law is directed towards the protection of human made heritage, although places and objects of scientific importance are covered. The NHRA also protects intangible heritage such as traditional activities, oral histories and places where significant events happened. Generally protected heritage which must be considered in any heritage assessment includes

The NHRA provides protection for the following categories of heritage resources:

- Landscapes, cultural or natural (Section 3 (3))
- Buildings or structures older than 60 years (Section 34);
- Archaeological Sites, palaeontological material and meteorites (Section 35);
- Burial grounds and graves (Section 36);
- Public monuments and memorials (Section 37);
- Living heritage (defined in the Act as including cultural tradition, oral history, performance, ritual, popular memory, skills and techniques, indigenous knowledge systems and the holistic approach to nature, society and social relationships) (Section 2 (d) (xxi)).

3.1 Grading

Heritage resources are graded following the grading guidelines, “Grading: Purpose and Management Implications” as approved by Heritage Western Cape Council in 2016 (Table 1).

Table 1: Grading of heritage resources

Grade	Level of significance	Description
I	National	Of high intrinsic, associational and contextual heritage value within a national context, i.e. formally declared or potential Grade 1 heritage resources.
II	Provincial	Of high intrinsic, associational and contextual heritage value within a provincial context, i.e. formally declared or potential Grade 2 heritage resources.
IIIA	Local	Of high intrinsic, associational and contextual heritage value within a local context, i.e. formally declared or potential Grade IIIA heritage resources.

IIIB	Local	Of moderate to high intrinsic, associational and contextual value within a local context, i.e. potential Grade IIIB heritage resources.
IIIC	Local	Of medium to low intrinsic, associational or contextual heritage value within a national, provincial and local context, i.e. potential Grade IIIC heritage resources.
NCW		Not conservation-worthy. The Heritage Authority has applied its mind and the resourced does not have enough heritage significance to be included in the National Estate.

3.2 NID Response

A Notice of Intent to Develop was submitted to HWC and the following comment received on the 27 June 2019 (**Annexure 3**):

> *You are hereby notified that, since there is reason to believe that the proposed consolidation and re-development of the site, Erf 2103, Plettenberg Bay, will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA be submitted. This HIA must have specific references to the following:*
>
> *-An Archaeological Impact Assessment*
>
> *The required HIA must have an integrated set of recommendations.*
>
> *The comments of relevant registered conservation bodies and the relevant Municipality muse be requested and included in the HIA where provided. Proof of these requests must be supplied.*

4. METHODOLOGY

This report is conducted in terms of Section 38(4) of the NHRA. Lita Webley was appointed to undertake the archaeological impact assessment (AIA) as well as the Heritage Impact Assessment (HIA). The reports comply with the minimum standards set out by HWC, in terms of the NHRA.

4.1 Literature Survey

A comprehensive survey of available literature was carried out to assess the general heritage context of the area. Published and unpublished literature on the Plettenberg Bay area was consulted to determine the nature of the archaeological resources which might be identified on Erf 2103. A number of unpublished impact assessments have been conducted in the general area, while the Robberg Peninsula to the south and Matjes River Cave to the north have been the focus of academic research for the last few decades. The 1:50 000 maps of the area as well as Google Earth aerial images were consulted.

4.2 Field Survey

The study area was surveyed by Webley on the 4th August 2019. Access was gained via a gate on the Piesang Valley Road (Figure 2). Transects were walked across the study area (Figure 7). All sites and features were photographed and recorded, and their positions taken with a hand-held Garmin GPS device.

4.3 Assumptions and Limitations

It is important to emphasise that the survey was only able to identify above ground heritage resources. There may be archaeological sites (as well as human remains) buried beneath the topsoil. I am of the opinion that this is not a significant limitation.

5. SITE DESCRIPTION

The **northern portion** of the study area extends from the Piesang Valley Road towards southern bank of Piesang River and consists of formerly cultivated agricultural pasture (presently lying fallow) (Figure 2). This area is predominantly overgrown by grass and limited indigenous vegetation/ shrubs along cadastral boundaries, thus allowing for open views between the river and public road. This area is also traversed by a natural inlet (essentially a remnant tidal channel) which is directly linked to the Piesang River. It is understood that this area is prone to occasional flooding.

Plate 1: View from the southern portion of Erf 2013, across the Piesang Valley Road (in the foreground), to the northern portion of the Erf. The green pastures, with recent dump of organic material, represents the location of the northern study area. The southern section is covered under dense grass, exotic and indigenous trees and many garden plants.

Plate 2: The northern of the northern portion of the Erf, looking in an easterly direction. Horizontal marks are clearly visible in the pastures, indicating old plough marks. Note the short vegetation.

Plate 3 : The remnant tidal channel which flows into the Piesang River, and which divides the northern portion of the Erf into two halves. The red arrow points to a slab of concrete, possibly an earlier causeway.

Plate 4 : The northern boundary of the Erf is the Piesang River, which here flows through a dense area of reeds.

The **southern** portion of the study area consists of higher-lying ground south of the Piesang Valley Road. It also offers selected views towards adjoining properties and the river valley. While also mostly overgrown by grass, there is exotics, representing the remnants of an old garden, including: a palm tree, a rubber tree, a guava tree, blue gum, flowering cherry, pelargonium, bougainvillea and lilies. There are also four yellowwoods and one acacia.

Plate 5 : View southward across the southern portion of the Erf from the Piesang Valley Road. The property is elevated and covered in dense grass and many shrubs and trees.

The remains of stone walling and wooden fences are further described and illustrated below under archaeological findings.

5.1 Archaeological Background Plettenberg Bay

The archaeological importance of the Plettenberg Bay region has been described by Kaplan (1993). In his 1993 desktop survey of the coastal zone of South Africa, Kaplan noted that there are “36 sites in Plettenberg Bay, of which six are ESA, four are MSA, 20 are LSA, three ESA/MSA, two MSA/LSA and one indeterminate”. There are 22 caves sites, five open station shell middens and nine open-air sites. The majority of these sites were reported from the Robberg Peninsula. Since 1993, however, numerous sites have been reported as a result of CRM work in the area.

Figure 3: The location of some of the CRM studies referred to in the text (blue). The Erf is in red. The most significant archaeological sites in this area are Nelson Bay Cave (in the Robberg Nature Reserve), and the Matjes River Shelter near Keurboomstrand, both of which are declared Provincial Heritage Sites.

5.1.1. Early Stone Age

Early Stone Age (ESA) and Middle Stone Age (MSA) tools been recorded by Kaplan at Whale Rock (2000a), Robberg Beach Estates, Brackenridge, and Little Ladywood, all within a kilometre or two of Robberg Quarry (Kaplan 2000a, b, 2001, 2004). A few flaked stone tools were found during a survey of Erf 2074 Marine Way, Plettenberg Bay by Webley (2005) and on portion 6 of Ladywood 438 (Webley 2004).

The Brakkloof quarry/workshop site, on Portion 10 of the farm Brakkloof 443, is significant in that it was clearly targeted by early hominins as a source of raw material for making tools, and the employment of identifiable tool making techniques. During further expansion of the Robberg Quarry, a large collection of ESA stone artefacts was excavated and analysed (Orton 2018). A few artefacts from the MSA were also present. The artefacts were found in a gravel deposit and are interpreted as part of an extensive landscape of similar material. Orton (2018) suggests that the site was used as source of raw material with people living on the sandy

areas during the early part of the MSA. He describes the site as an extensive “pre-colonial cultural landscape” with a Grade IIIB grading.

Less well known is an important ESA workshop site that was recorded on Portions 59, 62 and 63 of the farm Brakkloof 443, some 1.5km south of Robberg Quarry during a HIA (Kaplan 2010). Large numbers of ESA tools, including handaxes, large bifacial cutting tools, modified flakes and discoidal cores were recorded in an old quarry, many of them in primary or near primary context. Archer (2011) was able to show that raw-materials at this site were procured by ESA people and artefacts were made *in situ*. Archer (2011) has shown that the site was visited on multiple occasions by these near-modern humans. Relatively little is known about Middle Pleistocene hominin behaviour in Africa, but the large numbers of artefacts at Brakkloof and the fact that many of them are diagnostic, `make it a very important archaeological locality, worthy of conservation and further research and interpretation’.

5.1.2. Middle Stone Age

The Robberg Peninsular contains numerous caves with significant archaeological deposit. Nelson Bay Cave on Robberg is crucial to our understanding of the Middle and Later Stone Age periods. In his analysis of the ESA material from the Brakkloof Quarry, Archer (2011) speculated on the possibility of *in situ* MSA material on the property but commented “no MSA artefacts with diagnostic characteristics were identified on the property during this study”.

5.1.3. Later Stone Age

The Robberg Peninsular contains numerous caves with shell midden material relating to the prehistoric occupation of the area. Kyriacou (2007) in her thesis on the re-investigation of Hoffman’s Cave on the Robberg Peninsula, identified two periods of occupation during the Later Stone Age between 4000 and 3300 BP. Some 14km to the north of Robberg at Keurboomstrand, is the site of Matjes River Rock Shelter – known for its depth of shell midden deposit and its numerous archaeological skeletons (Döckel 1998; Sealy et al. 2006) with dates ranging between 11 250 BP to 3 540 BP.Previous archaeological surveys have been conducted on Portion 57 of the farm Brakkloof 443 in 2001 (Webley 2001). This property, adjoining the coast, contained two localised scatters of marine shell but no archaeological materials (such as stone artefacts or pottery) of significance.

5.2 Pre-colonial Burials

According to Morris (1992), a significant number of burials have been recovered from the Plettenberg Bay area. The majority are from formal excavations of the archaeological sites of Matjes River at Keurboomstrand and on the Robberg Peninsula. The other burials were found in both shell middens and in sand dune contexts and generally uncovered during construction of residential properties. A survey of Erf 12529 on Beachy Head Drive, along the sweep of the sandy shore between Plettenberg Bay and Robberg, failed to produce any archaeological material (Webley 2009) but the most recent site inspection report by HWC staff (March 2019) identified a burial in loose sand on the corner of Langstone and Beachyhead Drive, confirming that burials are usually only identified during earthworks and are difficult to predict.

5.3 Historical Background Plettenberg Bay

The general area to the north of the Robberg peninsula is of interest because of the settlement by the survivors of the wreck of the Portuguese ship, the Sao Goncalo in 1630, preceding the settlement of the VOC at the Cape by two decades. The Sao Goncalo, laden with pepper and porcelain on her return trip from India, was wrecked in the bay formed by the Robberg headland. The 100 survivors built various buildings of wood, including a church, and lived on the coast for approximately 8 months before sailing back to Portugal in two smaller vessels

which they had built from the timber of the wreck. In 1977, Mr J Jerling, during levelling of land for the construction of his house, uncovered the survivors camp and retrieved a large collection of historical material.

Archaeological work on Portion 44 of the farm Brakkloof 443 (Smith 1986; Hart & Halkett 1993) and subsequently by Binneman and Webley (1993 & 1996), produced artefactual remains from the wreck, including blue and white porcelain of the Ming period, glass and carnelian beads, lead balls, fragments of incense, coins, medals and home-made mother-of-pearl spoons. These remains relate to the campsite of the survivors of the Sao Goncalo. In addition, during the development of Portion 44 of the farm Brakkloof 443, a Khoisan burial was also uncovered. In terms of the permit requirements, these remains are curated at the Diaz Museum in Mossel Bay.

Early Europeans called the bay “Bahia Formosa” meaning beautiful bay. By 1763, the first European settlers (stock farmers, woodcutters, hunters etc) had settled in the area, and a navigation beacon was erected on Beacon Island in 1771. In 1778, following a visit by the Governor of the Cape, Joachim van Plettenberg, a “baken” with the monogram of the VOC was erected indicating their claim to the bay and its economic resources (Sleigh 2005). The settlement was renamed to Plettenberg Bay. In 1786, the VOC investigated the establishment of a military outpost, initially on the land of one Cornelis Botha on the Piesang River. This was rejected because of the costs of purchasing Botha’s farm. The Raad decided to establish 25 erven, each of 1 200 to 1 500 square metres (**60 morgen**), next to the Piesang River for burgers to live who wished to take part in their plan for provision of wood to the VOC.

Halkett & Hart (2015) have investigated the “Old Rectory” site on Erf 3339 to the east of the Piesang River, on the headland. The site is considered of high historical significance as it dates from the time of the VOC occupation at the Cape (and together with the Wood Store ruin and the School house) forms part of the historic core of the town. During monitoring of the site, an extensive pre-colonial shell midden was recovered under a portion of the building.

An early map of Plettenberg Bay dating to 1801 (Figure 3), shows a cluster of three houses with the name “Boothas” to the north of the Piesang River (outlined in red). This presumably refers to Cornelis Botha who is described as one of the earliest settlers in Bahia Formosa (Tapper 1973).

Figure 4: A map entitled “Plan of Plettenberg Bay on the south coast of Africa by William Rice. 1801” (In the map collection of the Libraries Department of the University of Cape Town).

5.4 Background to Erf 2103

J van Rooyen (one of three brothers who had emigrated from Holland) was granted a piece of land called 'Pisang Rivier' in 1807 (Cape Archives[2]) and a portion of this farm later became Erf 2103.

In the survey diagram dated to **1818**[3], the farm **442 Knysna**, comprising 1372 morgen (with the freehold property of 60 morgen excluded), was surveyed for by Jan van Rooyen (he had started petitioning for the land in 1807 according to the records). The grant of land excluded the 60morgen freehold, referred to above, which the VOC had granted to burgers for the supply of timber.

The survey diagram for the 60 morgen[4] freehold (of the Farm No. 441) indicates a cluster of buildings named "woonhuis" to the east of the river, which appear to be in the approximate location of "Boothas" (Figure 3). Interestingly, it also includes a Khoekhoen settlement ("Hott'ts Kraal") close to the tributary of the river, supporting the presence of the Khoekhoen pastoralists in the area right up until the beginning of the 19th century.

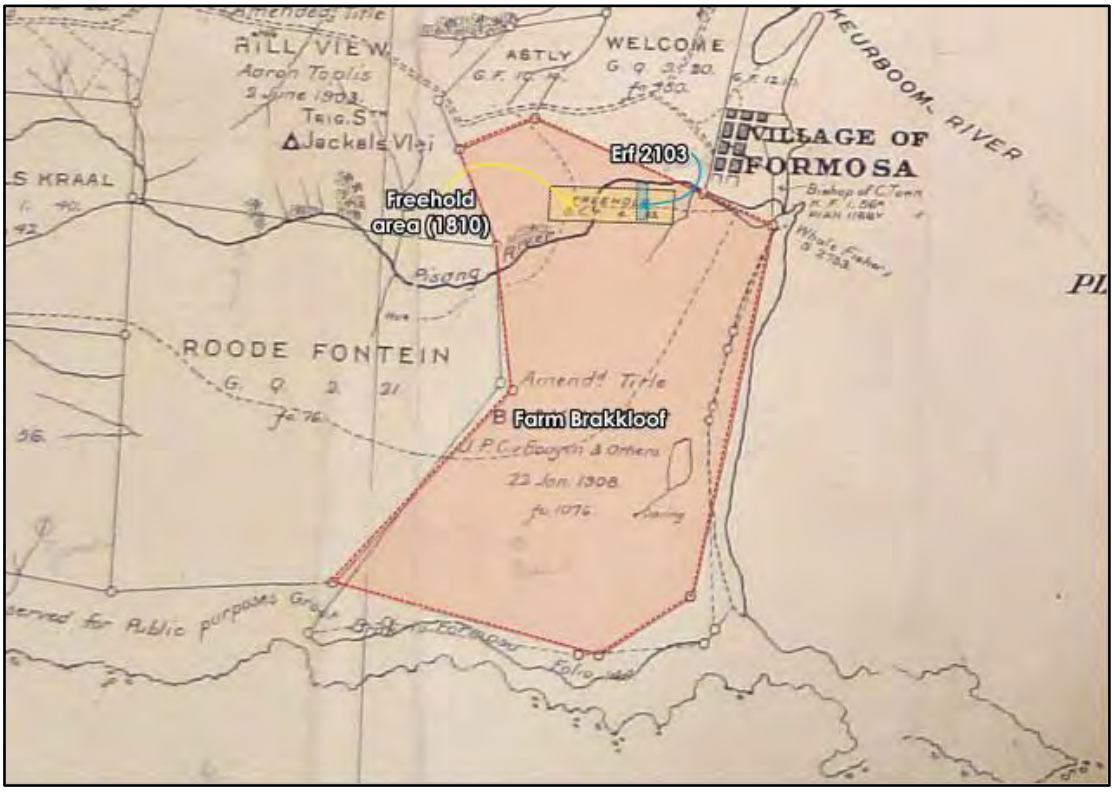

Figure 5: Approximate location of Erf 2103 in relation to original loan farm Brakkloof (Source: 1880-1890 SG Mapping (as edited), NGSI). The original 60 morgen (rectangle in yellow) and Erf 2103 in blue.

[2] KAB CO 3896/99
[3] SG Diagram 421/1818
[4] SG Diagram 80/1810

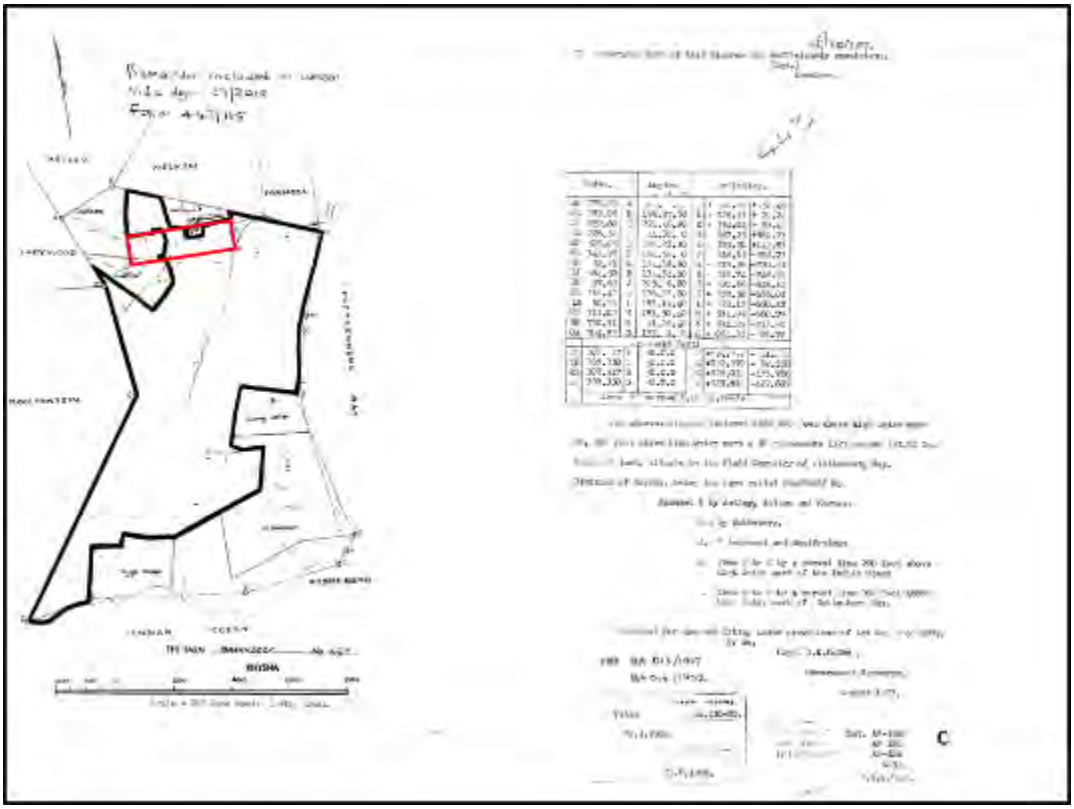

Figure 6: The Survey Diagram dating to **1907** for the Farm Brakkloof 443 (S.G.390/1907), which shows the rough outline of Farm 442, indicates how the land granted to Jan van Rooyen had been subdivided in the ensuing 100 years. The outlines of the 60morgen freehold (in red), excluded from the farm in 1808 are still visible, running along the Piesang River. Erf 2103 incorporates a portion of this original freehold.

Finally, the survey diagram for Erf 2103, dating to **1910**[5] indicates that it is 4 morgen in size and describes it as: "being a portion of the farm Brakkloof granted under Act 9 of 1879 to J.P.C. van Rooyen & 28 other on 22 January 1908". The 4 morgen (being Erf 2103) was transferred to Cornelius Wickham on 21 January 1911.

An analysis of the 1942 and 1958 aerial images for the area (see HIA) indicate that there appear to be no structures on the Erf in 1942, but that there is a building on the southern portion by 1958.

6. ARCHAEOLOGICAL FINDINGS

Transects were walked across the northern portion of Erf 2103 (Figure 7). Visibility was excellent, as the low vegetation cover has been regularly browsed by horses and is very short. The soil was examined along the Piesang River, on both sides of the shallow tidal channel and in the large hole (Geotech) excavated into the upper deposits. The sand is grey and silty, presumably the result of previous flooding events. There is no evidence for any quartzite cobbles with the exception of the small heap found near the tributary and presumably relates to a dumping event. This heap of cobbles is further illustrated and described below.

It was not possible to walk transects across the southern portion of the property because of its very hilly topography. In addition, the grass cover was knee high and it was impossible to see the ground with the exception of the access road.

[5] SG Diagram 566/1910

The features recorded in Figure 7, are illustrated and described below.

Plate 6: Feature 1 represents a rectangular concrete base (15m x 5m), which appears to be a remnant of a building which has since been demolished. The concrete contains quartzite chips and is likely to be recent. No other associated material was observed.

Plate 7: Feature 2 is a large circular pit (10m in diameter) recently excavated to a depth of between 1-2m. It represents a Geotech excavation. The walls of this excavation were examined, but there are no traces of any river cobbles and no artefactual remains.

Plate 8: Feature 3 comprises a small heap of quartzite stones, including one chunk (with two flake scars), on the northern banks of the tributary. They appear to have been recently dumped here.

Plate 9: Stone walling and swing on the southern section of the Erf. Remnants of the old garden may be traced in the vegetation. The brewery under construction is visible on the adjoining erf.

No archaeological material was recorded on the northern portion of the Erf. The small heap of quartzite cobbles near the tributary (Plate 8) appear to have been dumped there and there is no evidence that they derive from the site.

The southern portion of the Erf was more difficult to survey due to the dense vegetation. The presence of the garden features, and the aerial images from 1958 suggest that there was a house/structure on the ridge which has since been demolished. The location of the house could not be determined from the field survey due to the dense grass cover.

Figure 7: Tracks recorded with GPS during the survey of the 4th August. The features recorded during the survey are further illustrated and described below.

Previous surveys seem to suggest an absence of archaeological material along the floodplain of the Piesang River. Surveys of Portions 50 and 51 of Brakkloof 443, which are on a tributary of the Piesang River, failed to identify any archaeological remains (Webley 2007). Similarly, Erf 2098 which is located on the Piesang River, close to the mouth at Beacon Island, also failed to produce any archaeological material (Webley 2008b).

7. IMPACT ASSESSMENT

The main cause of impacts to archaeological sites is direct, physical disturbance of the material itself and its context. The heritage and scientific potential of an archaeological site is highly dependent on its geological and spatial context. This means that even though, for example a deep excavation may expose buried archaeological sites and artefacts, the artefacts are relatively meaningless once removed from the area in which they were found. The impacts are likely to be most severe during the construction period although indirect impacts may occur during the operational phase of the project.

It is important to note, that due to the localised nature of archaeological resources, that individual archaeological sites could be missed during the survey, although the probability of this is low. Further, archaeological sites and unmarked graves may be buried beneath the surface and may only be exposed during earth-moving and construction.

The purpose of the AIA is to assess the sensitivity of the area in terms of archaeology and to avoid/or limit the potential impacts of the development by means of mitigation measures.

The archaeological survey has failed to identify any archaeological resources, with the exception of small heap of quartzite stones which appear to have been recently dumped in the area. There is no evidence that the material comes from Erf 2103. Further, and assessment of the historical sources (documents, aerial photographs, etc.) suggests that the probability of recovering archaeological material is low, and the confidence in this prediction is high.

Table 2: Impact Assessment

Nature of Impact: Destruction of archaeological resources on Erf 2103.		
	Without Mitigation	**With Mitigation**
Extent	Local (1)	Positive
Duration	Permanent (5)	On-site (1)
Magnitude	Low (3)	Long term (4)
Probability	Improbable (2)	Improbable (2)
Significance	Minor (20)	Minor (14)
Irreplaceable loss of resources?	Yes	No
Can impacts be mitigated?	No	N/A
Mitigation: • If during construction, any graves, shell middens or dense accumulations of stone tools are uncovered then the ECO should report this to HWC (Tel: 021 483 9689)		
Cumulative Impacts: N/A		
Residual Impacts: None		

8. MITIGATION

No mitigation is required. If, during earthworks, any graves, shell middens or accumulations of stone tools are uncovered, then the ECO should report this to HWC.

9. PUBLIC PARTICIPATION

The integrated HIA has been submitted for consultation to the registered conservation bodies and the local municipality for this area (as per the table below) in accordance with the HWC Interim Comment to the NID. It should be noted that the process with respect public participation fell just outside the **Heritage Western Cape Public Consultation Guidelines** (June 2019).

Organisation / Department	Contact Person	Postal Address	E-mail	Contact No
Bitou Municipality (Planning & Building Control)	Adel Stander	Private Bag X1002, Plettenberg Bay, 6600	astander@plett.gov.za	044 501 3324
Simon v/d Stel Foundation (Southern Cape)	Natie de Swardt	PO Box 4037, George East, 6539	natiedes@telkomsa.net	083 7529340

9.1 Response to Comments Received

The Simon van der Stel Foundation: Southern Cape commented as follows:

"The archaeological competency of this conservation body is limited. However, having noted that Erf 2103 is situated on the Piesang River flood plain, an area regarded as of limited archaeological significance, based further on the fact that no direct ties to Nelson Bay Cave or Matjes River Shelter can be found, and the fact that no significant stone artefacts have been discovered, we support the view that the proposed development will not impact on any archaeological resources of cultural significance.

As there will be no destruction of cultural landscape or other heritage resources, and since the development will be in accordance with local government requirements, this conservation body does not oppose the development.

We support the proviso that, in the event of ground clearance or construction, archaeological material or human remains are uncovered, work in that area will be stopped immediately and the find reported to the provincial heritage authority".

The comments of the Simon van der Stel Foundation are noted.

The comment from the Bitou Local Municipality as follows:

- *Although the Plett Historical Society are not registered as a conservation body they will most likely be interested and affected parties with regards to heritage concerns within Plettenberg Bay and it is suggested that they be given the opportunity to provide comments on the assessment and proposal.*
- *Although the adjacent areas east of the property have been developed in the past the rural characteristic and sense of place that presides as you enter Plettenberg Bay via Piesang Valley Road is still mostly intact and should be endeavored to be conserved.*
- *No solid fencing should be used as this will inhibit the current open views to the Piesang River and detract from the rural sense of place. Visually permeable fencing, such as "clear view" fencing, should be utilized. The Bitou Municipal Fencing and Fences By-Law (2009) should be consulted and complied with.*
- *It is strongly suggested that only indigenous plant species endemic to the greater Plettenberg Bay area be utilized for all landscaping purposes. A landscaping guideline with an endemic plant list should be formulated and approved for the proposed development. This is to ensure that no exotic trees (such as Palm trees) be planted which may detract from the visual rural sense of place.*
- *The additional potential pedestrian bridges over the tributary are questioned. This will not be in line with principles established in the Piesang River Estuary Management*

Plan resulting in further canalization and barriers within the system. Ideally this tidal tributary is to be restored to as near natural as possible.

The comments of the Bitou Local Municipality are noted. Response:

- The PPP pertaining to this application preceded HWC's most recent Public Consultation Guidelines, 2019. While the local planning authority and registered conservation body was therefore notified of the proposal, there was no obligation to notify the Plett Historical Society. We would encourage the Plett Historical Society to register as a conservation body with HWC in terms of Section 25 of the NHRA;
- Comments regarding the rural sense of place along the Piesang Valley Road are noted. It is submitted that the development to the north of the road (residential dwelling) has already been approved by the Department of Environmental Affairs & Development Planning. The proposed development to the south of the road is of a similar size to that of the brewery which was recently approved on the adjoining Erf 2104 by Bitou Municipality and which is currently under construction. Detailed design aspects pertaining to any future development on the southern portion of Erf 2103 will be dealt with as part of the land use planning application to follow;
- Comments regarding permeable fencing are noted. A recommendation in support of provision of visually permeable fencing along the subject property boundaries have therefore been included in the HIA. Furthermore, it is noted that any future fencing could be undertaken in accordance with the requirements of the Bitou Municipal Fencing and Fences By-Law (2009);
- Comments regarding the use of endemic plants for the landscaping of the development are noted. An Environmental Management Plan was undertaken for the property as part of the previous EIA process for construction of the dwelling on the northern portion of Erf 2103 and included in Section 7.14 of the EMP (Rehabilitation and Botanical Concerns) state as follows: "Any disturbed area that is not designated for roads or buildings must be rehabilitated. No alien vegetation may be used for any rehabilitation work. A Rehabilitation Plan/Method Statement must be approved by the ECO. Ideally rehabilitation should take place prior to the rainy season in order that the plants establish sufficiently". Landscaping and acceptable plant material is dealt with in the Operational Section: "A Comprehensive Rehabilitation Plan referring, inter alia, the appropriate types of indigenous, endemic plant species to be used during rehabilitation forms part of the EMP and was approved as part of the DEA&DP EA (Annexure 7);
- With respect the last bullet point, the developer has decided to omit the pedestrian bridge from the proposal and therefore no impacts will occur.

Note that a thorough Public Participation Process was conducted in terms of NEMA for the first phase of the development, namely the construction of the residential dwelling on the northern portion of Erf 2103, see attached Environmental Authorisation (**Annexure 7**).

10. RECOMMENDATIONS

Indications are that in terms of archaeological heritage, impacts are expected to be negligible. The study area is considered to be of very low heritage significance. It is recommended that the project be authorised with the following standard conditions:

- If during ground clearance or construction, any archaeological material or human graves are uncovered, work in that area should be stopped immediately and the ECO should report this to Heritage Western Cape (**Tel: 021 483 9689**). The heritage resource may require inspection by the heritage authorities, and it may require further mitigation in the form of excavation and curation in an approved institution.

- With regard the comments of the Bitou Local Municipality, it is recommended that the developer take note of the comments regarding permeable fencing and consult the Bitou Municipal Fencing and Fences By-Law (2009).

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