HWC Case No: 19060703LB0613E

INTEGRATED HERITAGE IMPACT ASSESSMENT (INCORPORATING AN ARCHAEOLOGICAL IMPACT ASSESSMENT) IN TERMS OF SECTION 38(4) OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999)

PROPOSED DEVELOPMENT OF ERF 2103, PLETTENBERG BAY, BITOU MUNICIPALITY, WESTERN CAPE PROVINCE

Prepared for: Saskia Vogel
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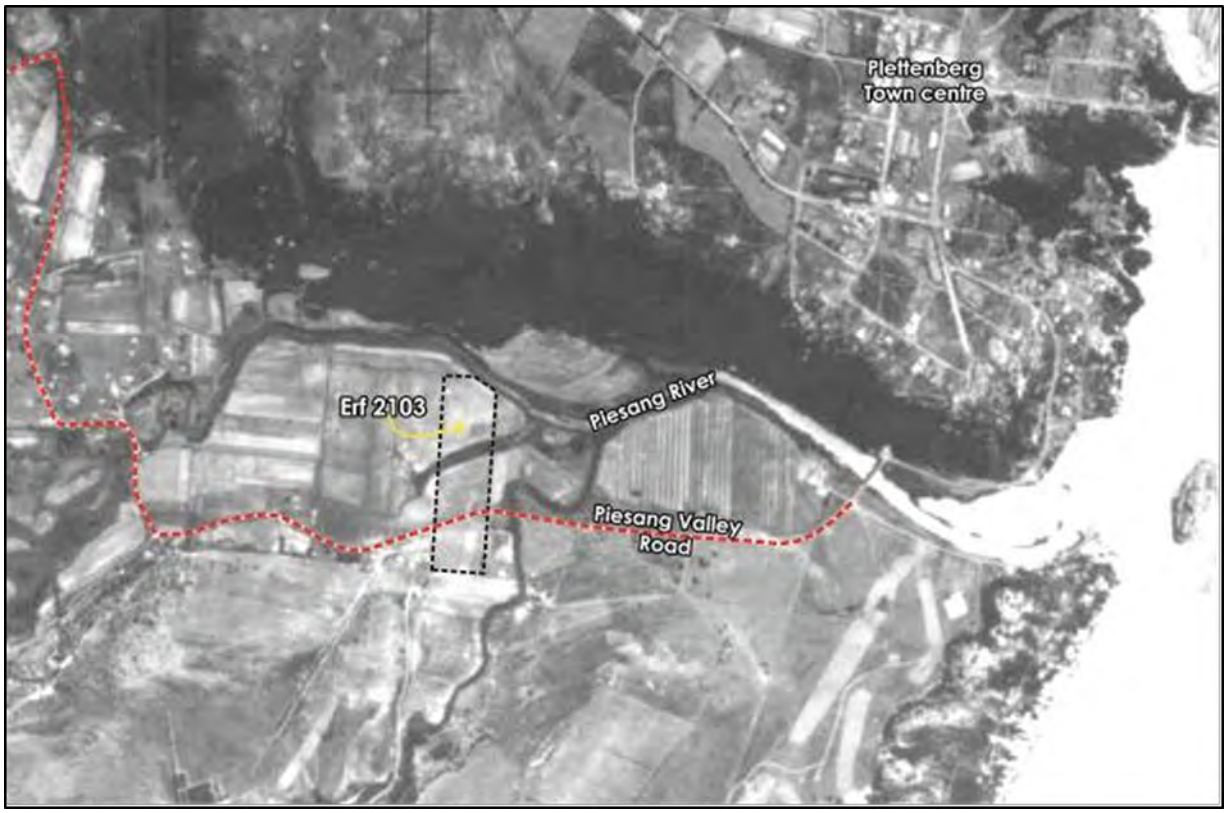
September 2019



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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 (4ha in total) is situated to the north (2,9ha in extent) and south (1,1ha in extent) of the Piesang Valley Road.

Description of Proposed Development:
Development proposals for Erf 2103, Plettenberg Bay comprises three components that relate to the northern and southern portions of Erf 2103 (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 omit said pedestrian bridge 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 for the second and third component of the development 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 Heritage Resources

Archaeology
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 dating to 1958 suggest a structure/building on the southern portion of the Erf 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.

Cultural Landscape
The subject property was formerly part of a rural cultural landscape that has already seen considerable transformation during recent years, primarily due to urban development. Considering the pattern of existing (and approved) urban development within the direct proximity of Erf 2103, it is considered that the proposal would not material impact upon a cultural landscape of significance.

Built Environment
No remains/ ruins of the structure formerly situated on the southern portion of Erf 2103 (as visible on 1958 aerial imagery) could be located. The proposed development would not impact on any structures of cultural significance, situated on or within the direct proximity of Erf 2103.

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 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 (Sept 2018), 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

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GLOSSARY

Early Stone Age: The archaeology of the Stone Age between 1 000 000 and 250 000 years ago.

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

Later Stone Age: The archaeology of the last 30 000 years associated with fully modern people.

Middle Stone Age: The archaeology of the Stone Age between 30 000 and 250 000 years ago associated with early modern people.

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
DEADP	Department of Environmental Affairs & Development Planning
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) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act 25 of 1999) with relation to proposed development of Erf 2103 Plettenberg Bay, Bitou Municipality, Western Cape Province (Figure 1). A copy of the Power of Attorney and copies of the relevant PoA and SG 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 Description of Study Area

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.

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 described in Section 3 of this report and outlined in the conceptual site development plan (**Annexure 2**).

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. Note the large micro-brewery which is in the process of construction on the adjoining erf.

1.1.1 Portion North of Piesang Valley Road

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 covered in short grass/pasture 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 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 northwards, from the southern portion on Erf 2013, across the Piesang Valley Road (in the foreground). 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.

1.1.2 Portion South of Piesang Valley Road

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

Existing land use within the proximity of the Erf is varies, and includes single residential, medium-high density residential properties, a small business node to the east along the Piesang valley Road and Greenwood Bay Schools and College to the west. A small micro-brewery is under construction directly east of the study area, on Erf 2104 (Figure 2).

2. HERITAGE STATUTORY PROCESS

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)).

2.1 Definitions

Archaeological means: "material remains resulting from human activity which are 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" (S2)(ii)(a). It includes "rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation" (S2)(ii)(b).

2.2 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.

2.3 Interim Comment to the NID

A Notice of Intent to Develop was submitted to HWC by Perception Planning 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.

After submission of the NID and the Interim Response from HWC, the applicant applied to split the land use application into the portions north and south of the Piesang Valley Road. **However, the HWC Interim Comment continues to apply to the entire property.**

3. DEVELOPMENT DESCRIPTION

According to the conceptual architectural drawings by Scott & Partners, the proposed development would consist of three components that relate the northern and southern portions of the Erf (**Annexure 2**).

3.1 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 m 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**), 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

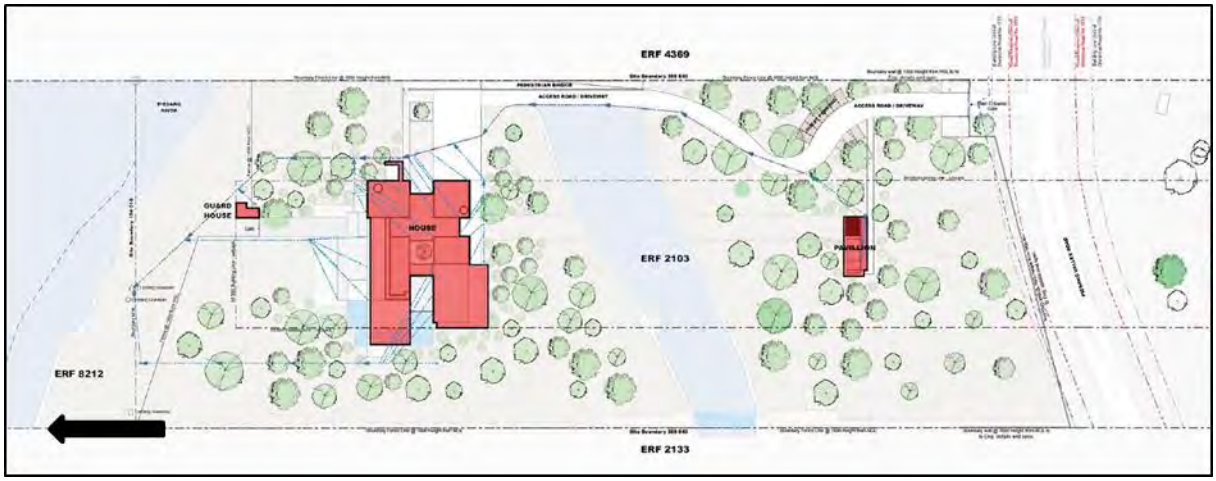

Figure 3: Conceptual plan for the northern portion of the Erf, showing three structures as approved by DEA&DP, including a dwelling, a pavilion and a guardhouse with possible pedestrian bridges over the tributary (supplied by client).

3.2 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.

Figure 4: A conceptual three-dimensional view of the proposed mixed-use development on the southern portion of the Erf (supplied by client).

Figure 5: Extract from the conceptual architectural drawings, indicating a photomontage of the proposed development along Piesang Valley Road.

3.3 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.

Additional explanatory conceptual plans are found in Annexure 2.

4. METHODOLOGY

As part of the compilation of this Draft Integrated HIA, the author visited, photographed and assessed the subject site and its environs and undertook the following actions:

4.1 Literature Survey

- A comprehensive survey of available literature was carried out to assess the general heritage context of the area, specifically the pre-colonial and colonial archaeology. 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 and aerial photographs 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 (see AIA). 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. SPATIAL PLANNING CONTEXT

5.1 Bitou Local Municipal Spatial Planning Framework (BLMSDF, 2013)

According to the BLMSDF (20th May 2013) future proposals for Erf 2103 and adjoining properties include GAP housing. This designation applies to the northern portion of the property – no spatial proposals are made for the southern portion of the property. Further spatial strategies proposed in Section 5.3.1.7 (p. 216) of the BLMSDF, 2013 for the Piesang River Valley include:

- “Identify strategies to ensure maximum use made of agricultural land;
- Promote low key private nature reserves with minimum accommodation to promote conservation of endangered shale fynbos vegetation to the west of Plettenberg Bay Country Club Private Nature Reserve. This would include extending the golf course, providing this is done along Audubon or similar principles, and providing MTB and hiking trails through the area;
- Integrate settlements on northern slopes into Coming Together corridor”.

5.2 Revised Bitou Municipal Development Framework, 2018

According to this document, the northern portion of Erf 2103 as well as those directly adjoining, are earmarked as a “Strategic Development Area” (“Bonded Low-Density Housing”) whereas the southern portion of the property is earmarked for “Business” (Figure

54). Further spatial strategies proposed in Section 4.3.1.2 (p. 156) of the MSDF, 2018 for the Piesang River Valley include:

- "Mixed income residential development should be promoted along the Piesang Valley Road as and where environmental conditions are suitable. This includes low to medium density housing in the upper precinct and low density residential in the lower precinct (SDA7 and 8);
- The existing business footprint to the south of the Piesang Valley Road could be extended westwards in the area demarcated (subject to environmental conditions).

6. HISTORICAL BACKGROUND OF THE SITE AND CONTEXT

6.1 Archaeological Background

The archaeology of the Plettenberg Bay region is described in the AIA.

The most significant archaeological sites in this area are Nelson Bay Cave (in the Robberg Nature Reserve) 5 km to the south of the study area, and the Matjes River Shelter near Keurboomstrand 12km to the north of the study area, both of which are declared Provincial Heritage Sites (Grade II). Both sites have been the focus of academic research over the last fifty years.

Briefly, Early, Middle and Later Stone Age tools been recorded in the area, mainly through CRM work. Important collections of ESA material have been made at a quarry site on portions of the farm Brakkloof 443 which inform on early hominid behaviour in the area. Later Stone Age shell midden deposits occur Nelson Bay Cave and Matjes River rockshelter but many have been destroyed through coastal development.

6.2 Burials

Numerous pre-colonial burials have been recovered from the Plettenberg Bay area, both in shell middens and in the dunes.

6.3 Historical Background

The general area immediately 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 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, some of which are on display in the municipal offices.

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. In 1778, following a visit by the Governor of the Cape, Joachim van Plettenberg, a "beacon" 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. 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. These rectangular freehold grants can still be seen in earlier land grants. 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 6: 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). The name encircled in red is "Bootha's" – a reference to one of the earliest settlements in Plettenberg Bay.

6.4 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 Jan van Rooyen. The grant of land excluded the 60 morgen freehold, referred to above. 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 6). 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.

The Survey Diagram for Brakkloof 433[5] dating to 1907 indicates how the land granted to Jan van Rooysen in 1818 had been reduced in size during the ensuing 100 years. The outlines of the 60 morgen of freehold is still visible in this survey map, running along the Piesang River. Erf 2103 incorporates a portion of this original freehold (Figure 7).

[2] KAB CO 3896/99
[3] SG Diagram 421/1818
[4] SG Diagram 80/1810
[5] SG Diagram 390/1907

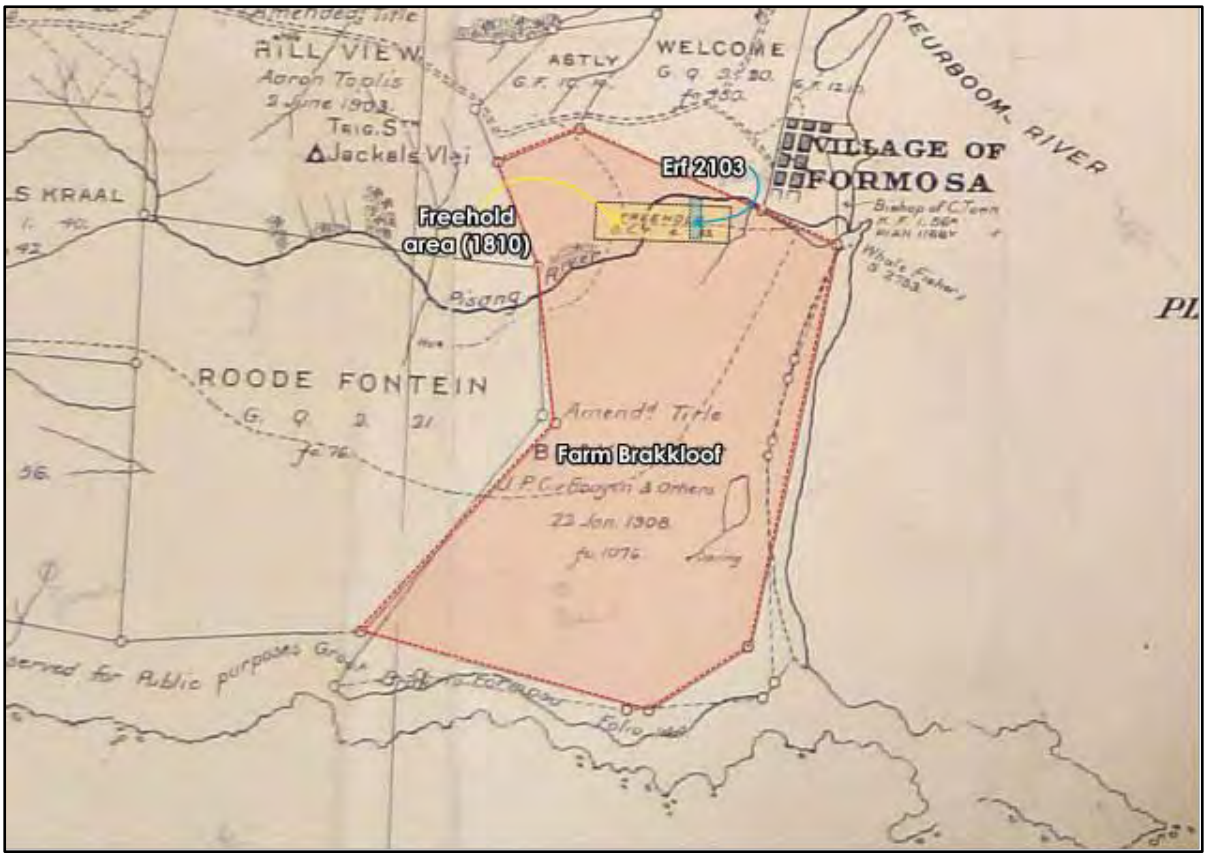

Figure 7: Approximate location of Erf 2103 in relation to original loan farm Brakkloof (Source: 1880-1890 SG Mapping (as edited), NGSI). The original 60 morgen (rectangle in yellow) and Erf 2103 in blue.

Finally, by 1910[6], an area of 4 morgen had been carved form the original farm granted to van Rooyen and it is described 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. Subsequent owners are shown below (Perception Planning, 2019).

Table 3: Ownership timeline for Erf 2103

Date of Transfer	Transferee	Title Deed No
1956	Charles Darrell Hallam	T 4509/1956
1990	Estate: Adine Sidney Hallam	T 5475/ 1990
1991	BEM Prop (Pty) Ltd	T 3284/ 1991
2017	Saskia Vogel	T 73487/2017

6.5 Cultural Landscape

Heritage Western Cape's Interim Comment to the NID did **not** require an assessment of the cultural landscape as a heritage resource in this area. However, in accordance with Section 38(3)(a), all heritage resources in the area are briefly described.

In their analysis of early aerial photography for the Background Information Document, Perception Planning (2019) pointed out that they provided useful insight into traditional cultural landscape patterns.

[6] SG Diagram 566/1910

The 1942 aerial image shows the following:

- Erf 2103 as part of an established rural landscape characterised by pastures and cultivated fields;
- No structures are visible on or within the immediate vicinity of the property;
- The tributary of the Piesang River which flows through the northern portion of the erf is considerably large, and extends westward into the adjoining erf;
- This image predates the development of the Beacon Isle Hotel and the current urban development south (i.e. along Robberg Road and Longships Drive).

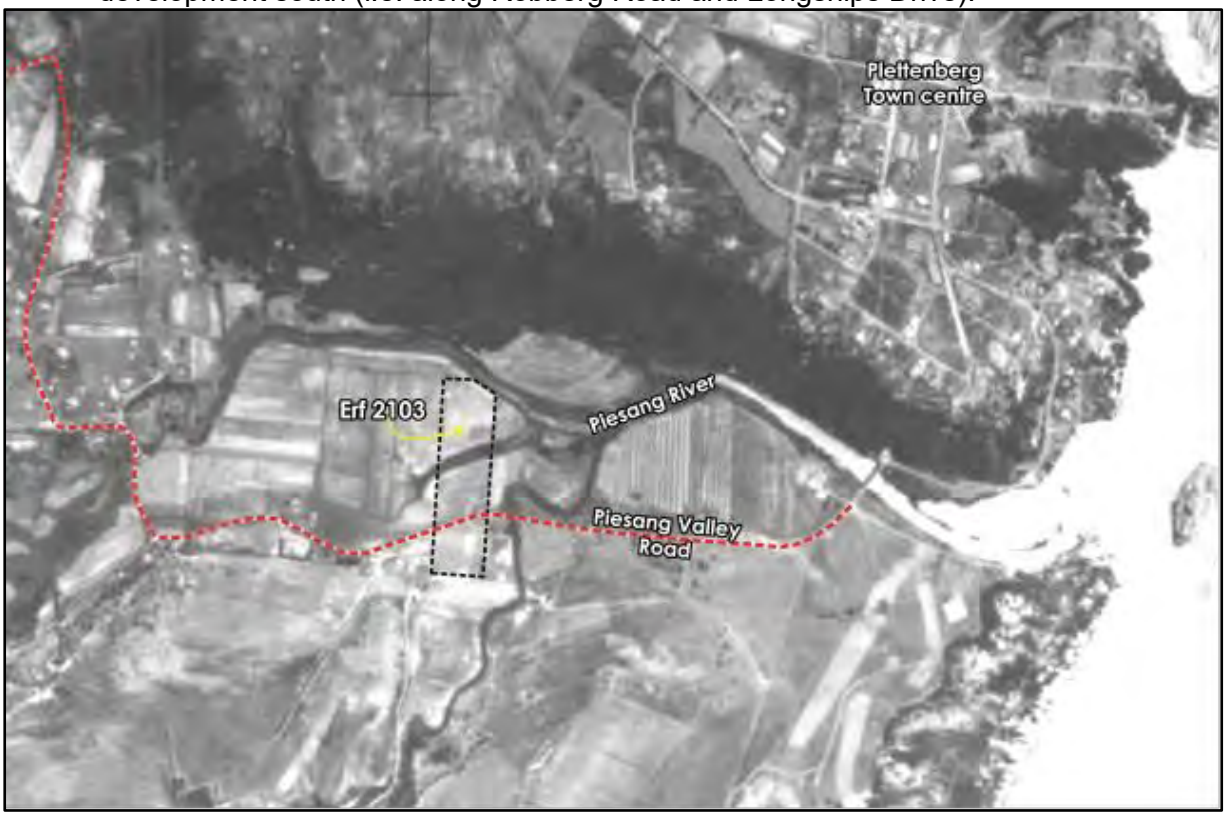

Figure: Erf 2103 and Piesang Valley Road superimposed on the 1942 aerial image for the area (Aerial survey 6, Flight Strip 40, Image 11591, NGSI).

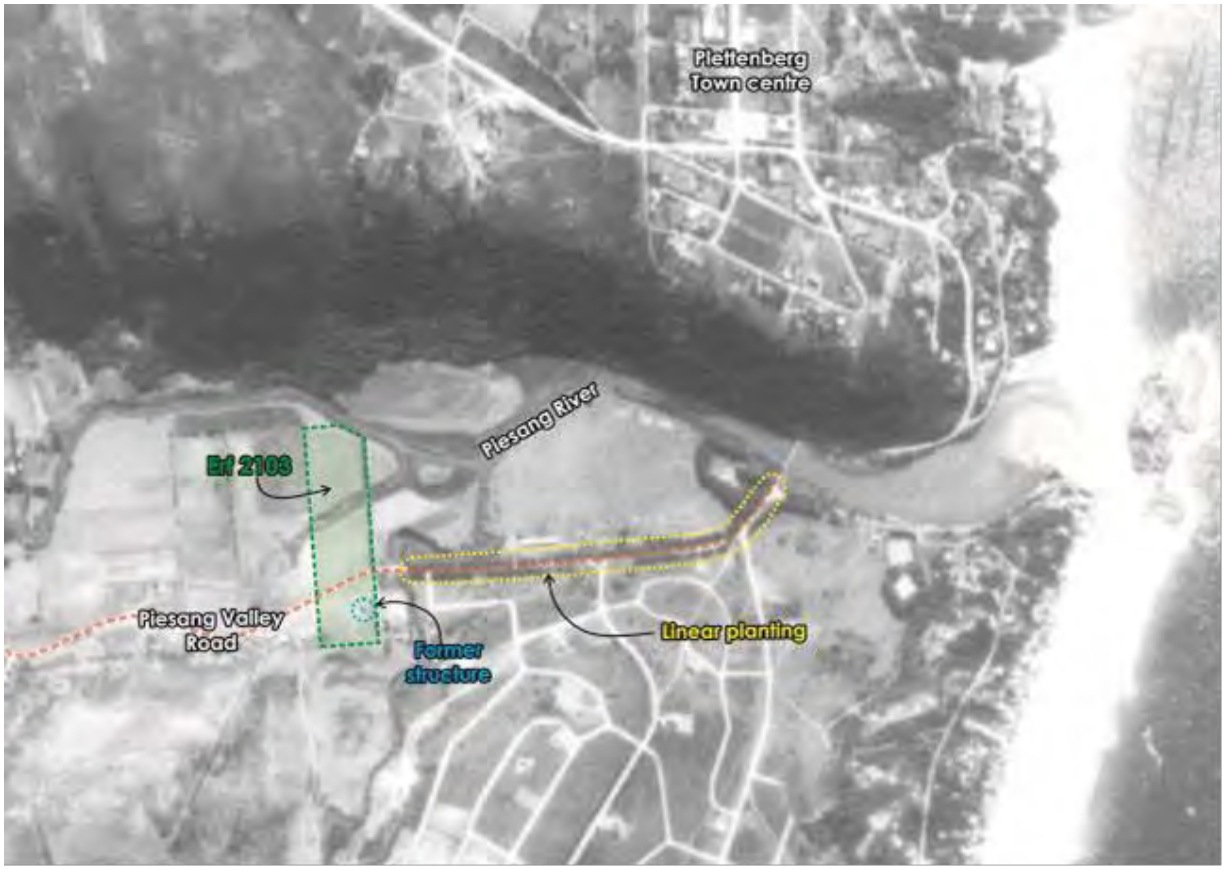

Figure: Erf 2103 and Piesang Valley Road superimposed on the 1958 aerial imagery of the area (Aerial survey 421, Flight Strip 14, Image 05376, NGSI).

The 1958 aerial imagery shows the following:

- A rural landscape between the Piesang River and the Piesang Valley Road which is still characterised by agricultural lands and cultivation;
- New residential township laid out to the south of the property. Roads have been constructed and a few dwellings are under construction;
- A small structure is visible on the southernmost portion of Erf 2103;
- Planting (trees) are visible along both sides of the Piesang Valley Road between the property and the bridge over the river further east.

Erf 2103 is one of the last few undeveloped properties between the Piesang River and the Piesang Valley Road. While urban densities north of the Piesang Valley Road remain comparatively low, high density urban development (notably businesses) occur to the east of the property, on both sides of the Piesang Valley Road.

While the subject property was formerly part of a rural cultural landscape that has seen considerable transformation during recent years, none of the traditional landscape patterns identified in the 1958 aerial imagery remain, primarily due to recent urban development. Given the pattern of existing (and approved) urban development within the direct proximity of Erf 2103, it is therefore considered that the proposal would not material impact upon a cultural landscape of significance.

No remains/ ruins of the structure formerly situated on the southern portion of Erf 2103 (as visible on 1958 aerial imagery) could be located. The proposed development would not impact on any structures of cultural significance, situation on or within the direct proximity of Erf 2103. It is noted that a large micro-brewery is in the process of construction on the adjoining erf (Figure 2).

7. HERITAGE RESOURCES AND ISSUES

Although HWC has called for an Integrated HIA assessing only impacts to **archaeological** heritage resources (Appendix 4), consideration is given to other heritage resources (Section 38(3)(a)) in the immediate area in order to broaden understanding of the site from a heritage perspective.

7.1 Archaeological Resources

Transects were walked across the northern portion of Erf 2103. Visibility was excellent. The soil was examined along the Piesang River, on both sides of the shallow tributary and in the large hole excavated into the upper deposits. The sand is grey and silty, presumably the result of previous flooding events. No evidence of any sub-surface cobbles or rocks could be seen.

Plate 3: 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 4 : The remnant tidal channel which flows into the Piesang River, and which divides the northern portion into two halves. The red arrow points to a slab of concrete, possibly an earlier causeway.

Plate 5 : The northern boundary of the Erf is the Piesang River, which here flows through a dense area of reeds.

There is no evidence for any stone which could have been used to manufacture artefacts, such as quartzite cobbles. The edges of the Piesang River, the banks of the tributary and the large excavation on the northern portion were closely examined for any stone artefacts. None were identified with the exception of the small heap found near the tributary and presumably relates to a single, recent dumping event (Plate 6). There is no evidence that they derive from the site.

Plate 6: Feature 3 comprises a small heap of quartzite stones, including one chunk (with two flake scars), on the northern banks of the tidal channel. They appear to have been recently dumped here.

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. 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.

Plate 7: The remains of a garden on the southern portion of the Erf, with terracing, stone walls, wooden fences and a swing. The micro-brewery under construction is visible on the adjoining erf.

7.2 Impact Assessment

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.

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		

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.

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, diagonally opposite Erf 2103, also failed to produce any archaeological material (Webley 2008b).

The archaeological survey has failed to identify any archaeological resources, except for a 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, an assessment of the historical sources (documents, aerial photographs, etc.) suggests that the probability of recovering archaeological material along the flood plain of the Piesang River is low.

7.3 Cultural Landscape

The cultural landscape assessment has shown that the erf was formerly part of a rural cultural landscape that has seen considerable transformation during recent years, primarily due to urban development. The proposed development will not impact on heritage resources of cultural significance.

7.4 Built Environment

The BID document submitted with the NID did not identify any significant buildings in proximity to the proposed development. While the Interim Comment has only requested an Archaeological Impact Assessment, this this HIA has assessed impacts to all heritage resources, as specified in Section 38(3)(a) of the NHRA.

An examination of the 1942 and 1958 aerial images, confirms the recent settlement of this part of Plettenberg Bay. According to the SAHRIS database, the PHS sites (Grade II) include the Old Rectory, the Woodstore and the Van Plettenberg Replica Beacon but they are all on the headland, in the old section of town.

8. 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

8.1 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 Bitou Local Municipality commented 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**).

9. RECOMMENDATIONS

Having regard to the above assessment, it is our view that the proposal would not impact on any heritage resource of cultural significance and that no further heritage-related studies would therefore be warranted in this instance.

The proposed development will not have a negative impact on the Erf, or on its context, nor will it create a loss of culturally significant landscape.

- 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).

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

- 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.

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Cape Town Archives

KAB CO 3896/99
KAB CAD 2/1/1/46 C14/29/26

SCHEDULE: PROJECT TEAM AND STATEMENT OF INDEPENDENCE

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