

INTEGRATED HERITAGE IMPACT ASSESSMENT IN TERMS OF SECTION 38 OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999): PROPOSED URBAN DEVELOPMENT ON A PORTION OF THE REMAINDER OF ERF 2833 (GREAT BRAK RIVER), MOSSEL BAY DISTRICT AND MUNICIPALITY



ON BEHALF OF: New Care Innovations (Pty) Ltd

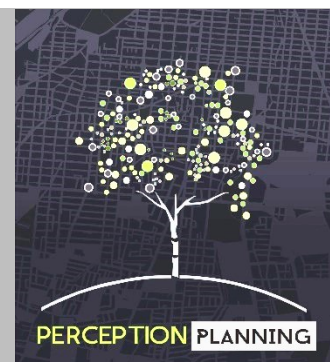
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PERCEPTION Planning

URBAN & REGIONAL PLANNING- ENVIRONMENTAL PLANNING- HERITAGE IMPACT ASSESSMENT- URBAN DESIGN

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ABBREVIATIONS:

AIA – Archaeological Impact Assessment
APM – Archaeology, Palaeontology and Meteorites Committee of Heritage Western Cape
DCAS – Department of Cultural Affairs and Sport (WCG)
DEA&DP – Department of Environmental Affairs and Development Planning (WCG)
EA – Environmental Authorisation
ECO – Environmental Control Officer
EMPr – Environmental Management Programme Report
ESA – Early Stone Age
HIA – Heritage Impact Assessment
HWC – Heritage Western Cape
Ka/kyr – Thousand years ago
LSA – Later Stone Age
MSA – Middle Stone Age
NCW – Not Conservation Worthy
NGL – Natural Ground Level
NGSI – National Geo-Spatial Information, Department of Rural Development and Land Reform
NHRA – National Heritage Resources Act, 1999 (Act 25 of 1999)
NID – Notice of Intent to Develop
PHS – Provincial Heritage Site
SAHRA – South African Heritage Resources Agency
SAHRIS – South African Heritage Resources Information System
WCG – Western Cape Government
WHS – World Heritage Site

COVER: Collage of contextual panoramic images of the study area and its direct environs (Author).

1. INTRODUCTION

PERCEPTION Planning was appointed by Joe Bezuidenhout (SA ID 640716 5061 081) on behalf of New Care Innovations (Pty) Ltd (being the registered landowner) to compile and submit to Heritage Western Cape 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 a portion of the Remainder of Erf 2833, Great Brak River. The formal property descriptions are outlined below. Copies of the Power of Attorney, Title Deeds and SG Diagrams are attached as part of **Annexure 1**.

The cadastral land units subject to this proposal are:

- Remainder of Erf 2833 (Great Brak River), Mossel Bay District and Municipality, measuring 6,0372 ha, held under title deed T 10193/2022, and registered to New Care Innovations (Pty) Ltd.

1.1 **Brief background to administrative process**

Following submission of a Notice of Intent to Develop in respect of the proposed development of the property during September 2023, HWC on 23rd October 2023 (**Annexure 2**) responded as follows [sic]:

"You are hereby notified that, since there is reason to believe that the proposed urban development on Remainder Erf 2833, Great Brak Rivier, Mossel 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. Section 38(3) of the NHRA provides

*(3) The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection (2)(a): **Provided that the following must be included:***

(a) The identification and mapping of all heritage resources in the area affected;

(b) an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7;

(c) an assessment of the impact of the development on such heritage resources;

(d) an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;

(e) the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;

(f) if heritage resources will be adversely affected by the proposed development, The consideration of alternatives; and

(g) plans for mitigation of any adverse effects during and after the completion of the proposed development. (Our emphasis)

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

- Palaeontology impact assessment

The HIA must have an overall assessment of the impacts to heritage resources which are not limited to the specific studies referenced above. The required HIA must have an integrated set of recommendations. The comments of relevant registered conservation bodies; all Interested and Affected parties; and the relevant Municipality must be requested and included in the HIA where provided. Proof of these requests must be supplied."

This Integrated HIA report focusses on addressing the aspects mentioned in the Interim comment dated 23rd October 2023 whilst adhering to the requirements specified in terms of Section 38(3) of the NHRA.

2. DESCRIPTION OF THE STUDY AREA

The subject property (6,0371 ha in extent) is situated ± 1 km north of the coastline, ± 230 m north of the N2 National Road (eastbound), ± 1.4 km west of the Great Brak River, 1km west of Long Street and ± 2.1 km southwest of the historic village centre (river crossing/Lang Street/Amy Searle Street) as per **Figure 1**. Vehicular access to the property is directly from Sandhoogte Road off Long Street/the N2 National Road.

The property forms part of a generally south-facing hillside physically divided by a densely overgrown valley cutting diagonally across as illustrated through **Figure 2**. The property, furthermore, forms part of a natural valley defining the western approach to the village along Sandhoogte Road and accessing the western half of the village strung out along Long Street (**Figure 3**). The property, essentially located along the western periphery of the village, is zoned Agricultural Zone 1 as are adjoining smallholdings to the north, south and west. A cluster of larger erven, all zone Single Residential Zone 1, as well as a retirement complex, is situated to the south-east.

Fieldwork undertaken on 25th August 2023 included a foot survey along recent tracks made during efforts to eradicate alien vegetation. While Google Earth © imagery shows paddocks (and a small outbuilding) established on the southernmost portion up until c. 2021, the entire property was found to be densely

overgrown this limiting archaeological visibility. No buildings or structures remain. A narrow, paved access road, providing access to smallholdings directly north, follows the western cadastral boundary.

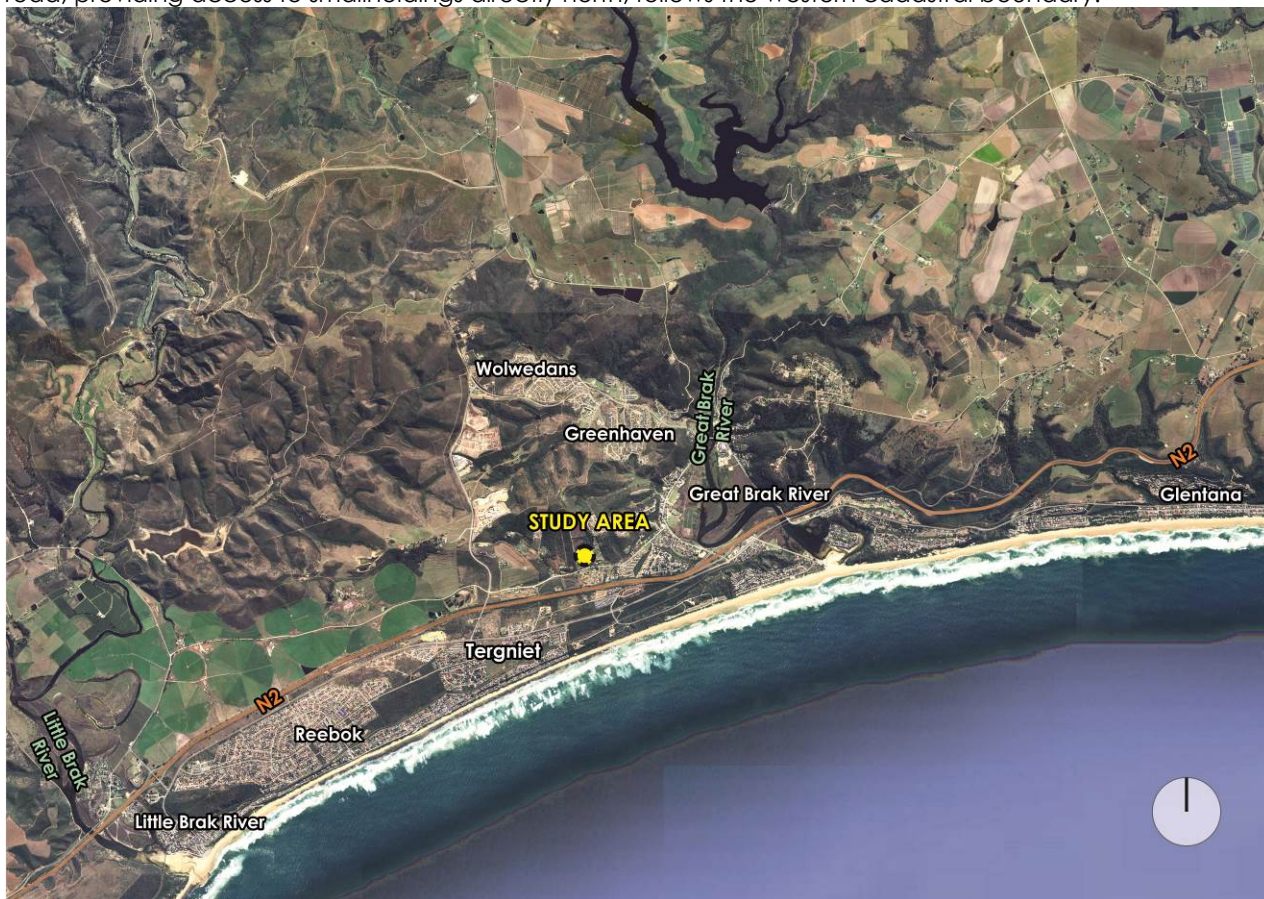


Figure 1: Study area location within a broader context (Google Earth, 2022, as edited)

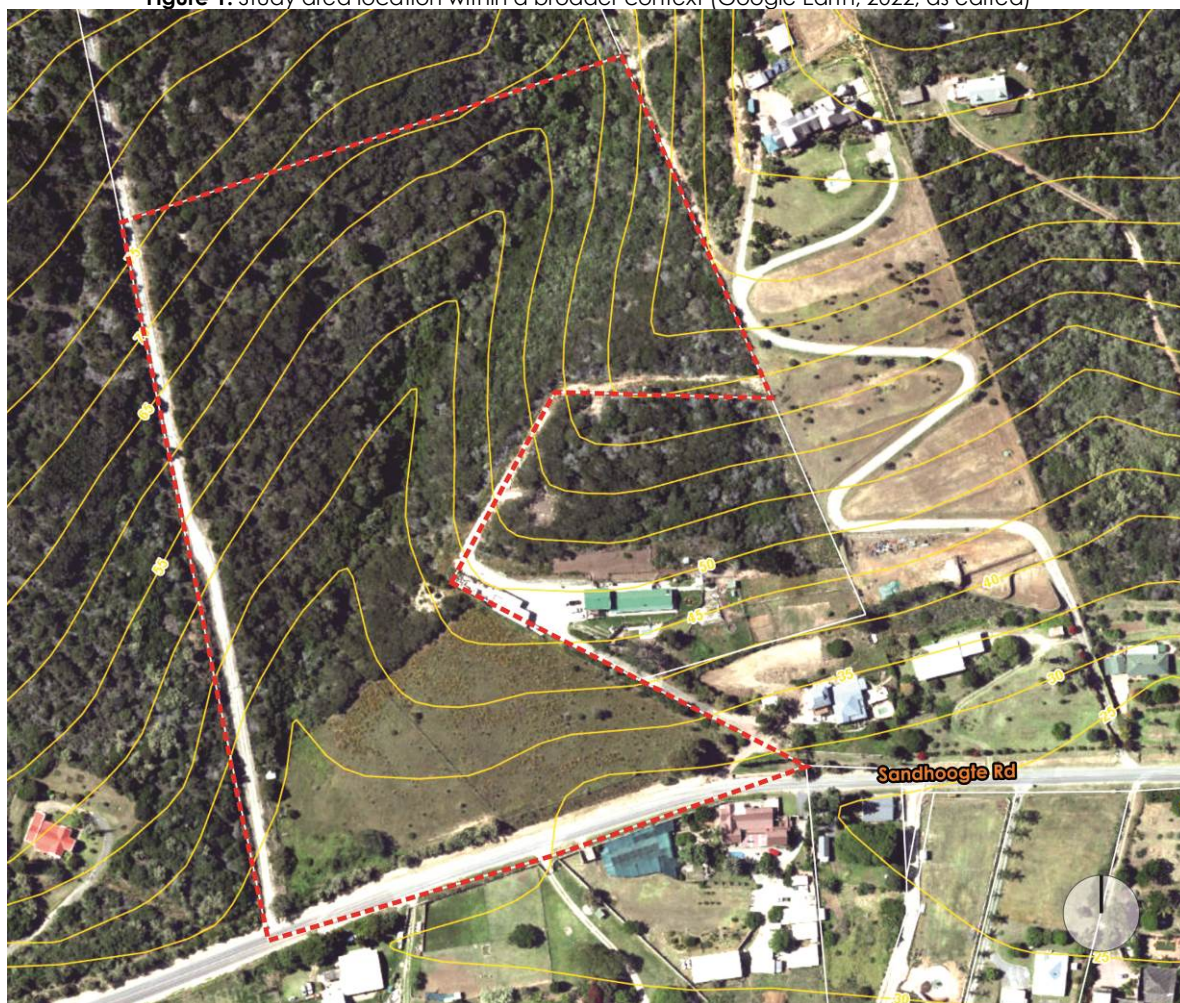


Figure 2: Existing topography of the property as illustrated through 5m contours (CFM, as edited).



Figure 3: Study area shown within its closer urban context, illustrating surrounding fabric and semi-rural landscape character (Google Earth, 2022, as edited).



Figure 4: Study area and its direct environs (Google Earth, 2022, as edited).

Photographs of the study area and its environs are attached as part of **Annexure 3** to his report.

3. HERITAGE STATUTORY FRAMEWORK

3.1 Grading

References to grading as meant within the context of this Integrated Heritage Impact Assessment are based on the categories as prescribed by HWC¹ and summarised in Table 1 below. Gradings presented are (a) aimed at formulating responses with relation to the perceived provincial and/ or local cultural significance of heritage resources identified and (b) assigning the appropriate level of management responsibility applicable to such heritage resources.

Grading	Description of resource	Examples of possible Management Strategies	Cultural Significance
II	Heritage resources with special qualities which make them significant in the context of a province or region, but do not fulfil the criteria for Grade I status.	May be declared as a Provincial Heritage Site by HWC	Exceptionally High Significance
III A	Such a resource must be an excellent example of its kind or must be sufficiently rare. These are heritage resources which are significant in the context of an area.	This grading is applied to buildings and sites that have sufficient intrinsic significance to be regarded as local heritage resources; and are significant enough to warrant that any alteration, both internal and external, is regulated. Such buildings and sites may be representative, being excellent examples of their kind, or may be rare. In either case, they should receive maximum protection at local level.	High Significance
III B	Such a resource might have similar significances to those of a Grade III A resource, but to a lesser degree. These are heritage resources which are significant in the context of a townscape, neighbourhood, settlement or community.	Like Grade IIIA buildings and sites, such buildings and sites may be representative, being excellent examples of their kind, or may be rare, but less so than Grade IIIA examples. They would receive less stringent protection than Grade IIIA buildings and sites at local level.	Medium Significance
III C	Such a resource is of contributing significance to the environs. These are heritage resources which are significant in the context of a streetscape or direct neighbourhood.	This grading is applied to buildings and/or sites whose significance is contextual, i.e. in large part due to its contribution to the character or significance of the environs. These buildings and sites should, as a consequence, only be regulated if the significance of the environs is sufficient to warrant protective measures, regardless of whether the site falls within a Conservation or Heritage Area. Internal alterations should not necessarily be regulated.	Low Significance
NCW	A resource that, after appropriate investigation, has been determined to not have enough heritage significance to be retained as part of the National Estate.	No further actions under the NHRA are required. This must be motivated by the applicant and approved by the authority. Section 34 can even be lifted by HWC for structures in this category if they are older than 60 years.	No research potential or other significance

Table 1: Summary of grading and possible mgmt. strategies for Grade II and III heritage resources (Source: HWC, 2016)

3.2 Methodology

This Integrated HIA process is undertaken in terms of Section 38(8) of the NHRA and in accordance with relevant HWC policies and guidelines and international practice principles. A flow diagram illustrating a normal, non-retrospective HIA process pertaining to development being proposed is as shown in **Figure 5** (overleaf).

Tasks undertaken during the compilation of this **Draft Integrated HIA** included, *inter alia*, the following:

- Liaise with project team including the landowner, environmental assessment practitioner (Cape EAPrac Environmental Consultants) and the local planning authority (Mossel Bay Municipality).
- Field work undertaken by the author on 25 August 2023.
- Undertake basic historic background research.
- Assimilate findings from heritage-related specialist inputs: Palaeontological Assessment (Prof Marion Bamford).
- Archaeological specialist input by Dr. Lita Webley.
- Contextual analysis of the site and its direct environs, identification, and mapping of spatial informants.
- Identification of possible heritage-related issues and concerns.
- Establishing cultural significance and recommending grading based on criteria set out in NHRA.
- Identification of heritage informants for decision making and input to the planning process.
- Undertake focussed public participation process with registered conservation body, local planning authority and other stakeholders as requested by HWC in the Interim Response to the NID and in accordance with the HWC Public Consultation Guidelines, June 2019.
- Incorporate outcomes emanating from public participation process and formulate appropriate response to comment received – to be included in the Final Integrated HIA report.
- Submission of Final Integrated HIA to HWC for adjudication.

¹ Grading: Purpose and Management Implications, Heritage Western Cape, 16th March 2016

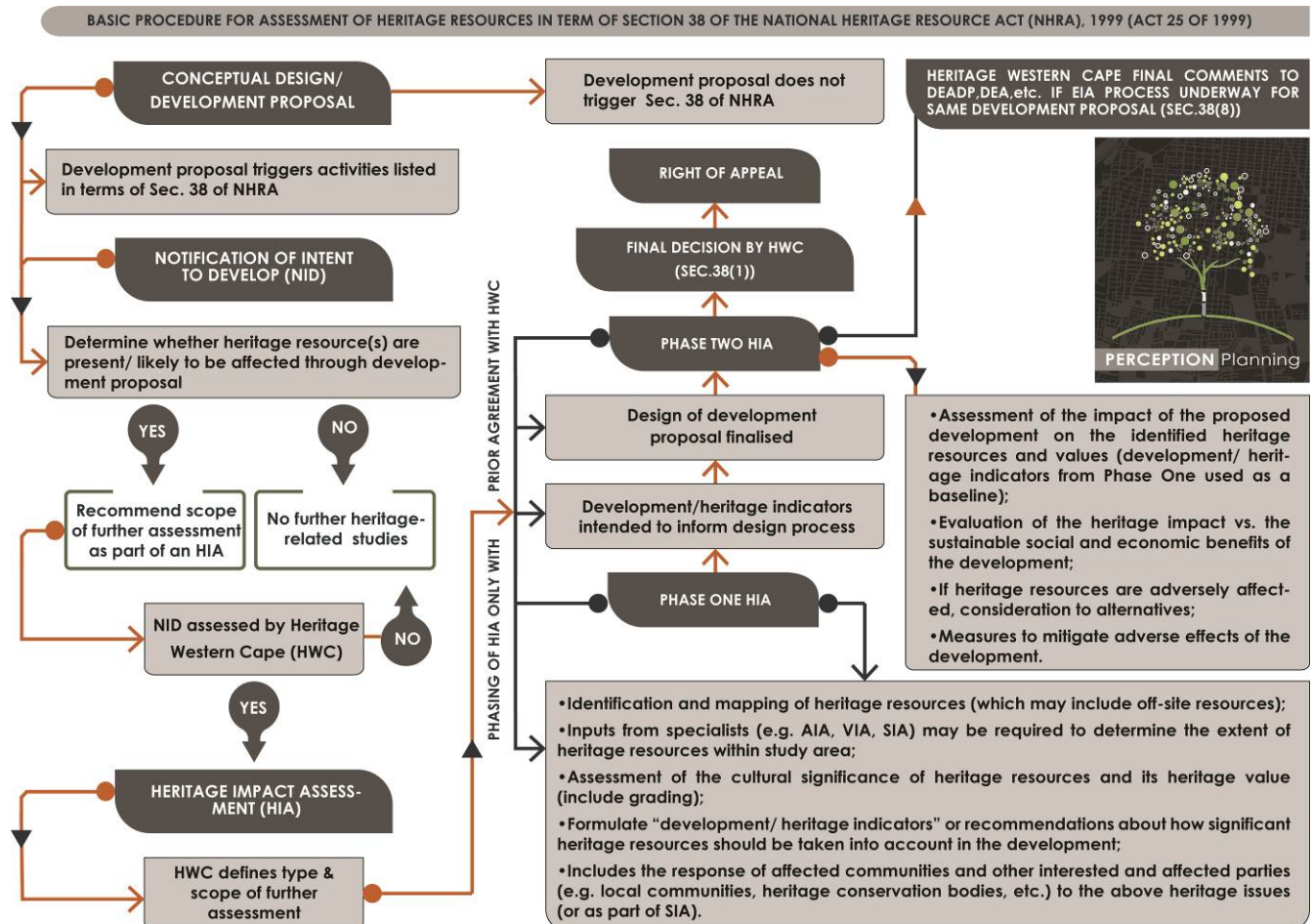


Figure 5: Flowchart illustrating a typical HIA process in terms of Section 38 of the NHRA (Act 25 of 1999).

4. PROPOSED DEVELOPMENT

According to information made available by JV Townplanner² the proposal is for rezoning of the property from Agricultural Zone I to make provision for a residential development comprising of the components outlined below. Copies of the conceptual site development plan are attached as **Annexure 4** to this report.

- 32 General residential erven located along the lower-lying, southern portion of the property;
- 12 Single residential erven located along the higher-lying, northern portion of the property;
- The densely overgrown valley diagonally crossing the property will be retained as Open Space Zone III;
- Private roads to access to the two precincts;
- Ancillary engineering infrastructure and services.

Two alternatives have been submitted and they differ only on their access roads:

- Non-mitigated SDP
- Preferred SDP
- The No-Go Option is also assessed in Table 2.

The Non-mitigated Alternative (Annexure 4.1 dated October 2022) includes 37 residential units zoned as General Residential Zone II (0.83ha and 13.74% of the total area) and a further 14 residential units zoned as Single Residential Zone I (surface areas of 1.44ha and 23.84% of the total area). The Open Space Zone consists of 2.28ha or 37.75% of the total property. The Non-mitigated SDP also has a single access road running through the property, while the second access road (Lakmanstraat) follows the northern perimeter fence.

The Preferred Alternative (Annexure 4.2 dated September 2023) comprises 32 residential units zoned as General Residential Zone II (0.83ha and 13.74% of the total area) and 12 residential units zoned as Single Residential Zone I (0.32ha and 5.30% of the total area). The Open Space Zone consists of 3.56ha or 56.94% of the total property. It has two access points from Tarrantaalstraat, one to the north and one to the south of the ravine running diagonally across the study area.

² SDP Dated September 2023

The overall development footprint of the 2023 layout is therefore much lower than the 2022 layout. The number of residential units has been reduced while the Open Space Zone has increased substantially in size, taking into consideration all the sensitive areas in terms of fauna, flora, and biodiversity.

Site Development Plans pertaining to the proposed development are attached as part of **Annexure 4** to this report.

5. SPATIAL PLANNING CONTEXT

According to the recently approved Mossel Bay Municipality Spatial Development Framework and Environmental Management Framework (2022) (hereafter "MSDF"), Great Brak River is situated within the designation Urban Edge and is earmarked for "Urban Expansion No. 68" (**Figure 6**) comprising of "Medium to High Density Residential, Business along the main road" (MB Mun, 2022:110).

The proposal therefore seems to be consistent with the spatial proposals outlined in the current MSDF applicable to the Great Brak River area.

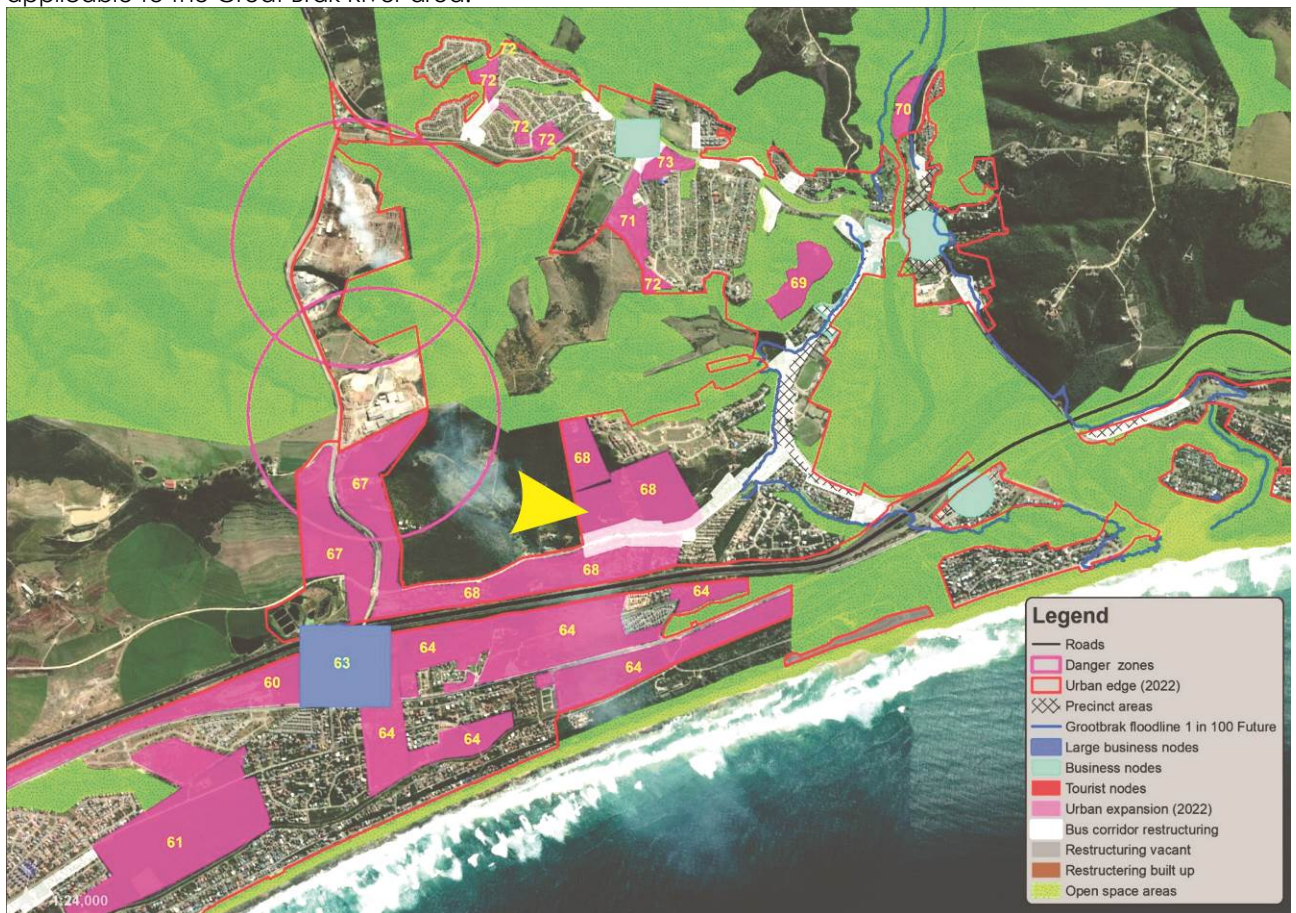


Figure 6: Location of Erf 2833, Great Brak River (yellow arrow) in relation to an extract from the MSDF applicable to the Great Brak River area (MB Mun, 2022 as edited).

6. HERITAGE RESOURCES AND ISSUES

This section of the report adheres to HWC's interim comments dated 23rd October 2023 as well as the requirements specified in terms of Section 38(3) of the NHRA.

6.1 Historic Background

Basic historic background research focussed on primary sources obtained through the Deeds Office, Surveyor General's Office, relevant secondary sources as well as as research previously undertaken by historian Kathleen Schulz.

6.1.1 Brief account of the early history of Groot Brak

In 1777 the Dutch East India Company (DEIC) established a woodcutter's post in the vicinity of George. The reason for establishing the post was twofold. Illicit harvesting from the Outeniqua forests warranted monitoring and wood for construction in Cape Town was in short supply. However, transporting the wood by wagon for shipping was problematic due to the many river crossings that had to be made to get to Mossel Bay.

The Groot Brak River spanned some 800ft and was often swollen during the rainy season. The Groot Brak weir or crossing area must have accommodated wagons waiting to cross the river since the time of colonization of the area. An outspan was developed on the eastern banks of the Groot Brak River, opposite the farm Wolwedans. The date of the establishment of the outspan site has not been established but is marked on the 1814 diagram as such and is also described on the 1901 cadastral series.

In 1811 George was established as a town and an economic society began to grow, warranting easier access routes to Outeniqualand. In 1844, Donald Moodie (Acting Civil Commissioner of George) was commissioned to build a wooden bridge across the Groot Brak River, which apparently did not hold up for long. It was recorded that in 1849, 193 wagons and 30 carts crossed the bridge giving an indication of the amount of traffic moving within the districts at the time.

The British period (c. 1806 - 1880) saw agricultural intensification in the area and various quitrent grants were issued in order to formalise use of land for hunting and grazing purposes. Wolwedans and various other farms that had already been used for agricultural purposes for decades were surveyed during this period. In 1812 Wolwedans is described as a "Pos-stasie", an "Outspan" is shown on an 1814 survey diagram and in 1816 the farm Voorburg was established as a quitrent farm. In 1850 a causeway was built across the Groot Brak River that replaced the wooden bridge.

It was in 1851 that Richard Searle was employed to maintain the causeway and manage the assigned toll. Richard Searles brother Charles arrived from England and jointly the brothers established a tannery business in the village in 1859. Early industrial development in the village included the construction of water furrows in 1874, establishment of a water-driven corn mill in 1875 and establishment of the "Good Hope Wool Washery" in 1876 (site next to washery in 1887 became a tannery). By the 1850's a small village had developed along the eastern bank of the river.

From this time onward the village has been well known for making shoes and tanning leather³. (The factory is home to the well-known 'Grasshopper' brand of shoes). The position of the original crossing is still used to access what is now known as Groot Brak village.

Expansion of worker's housing related to the Searles & Co Factory during the 1920's to 1940's led to the establishment of suburbs such as Greenhaven, Die Heuwel and adjoining Sunnybrae. Implementation of racial-based ideological policies between the period after WW2 and the 1970's saw the establishment of Die Toue which formed part of a predominantly coloured residential area on the outskirts of Great Brak, which was known as Ouwerf. In 1969 the Group Areas Act proclaimed "Die Toue" a coloured residential area – the area was later expanded and became known as Greenhaven (Baumann, N and Winter, S, 2003).

6.1.2 Early farm Wolwedans

From a colonial perspective, the western portion of the village Great Brak River was established on land deducted from the farm Wolwedans, the ownership of which spans back to the 18th century (**Figure 8**). Owners during the Dutch period included: Burgert van Wyk (1731 – 1751), Hendrick & Cornelius van Watt (1762) and "Heemraad" Cornelis van der Watt (1815)⁴. Other early farms during this period, used primarily for grazing and hunting, also included e.g. Voorburg - 1748, Rhebokfontein - 1762 and Sorgfontein - 1779⁵.

While the earliest diagram indicates that the farm Wolwedans was transferred to C van der Watt during 1814⁶, the quitrent grant states that he had been occupying the farm previously on loan via the Dutch East India Company loan system. The extent of Wolwedans was originally 2,632 morgen ($\pm 2,254$ hectares). The Groot Brak River formed the easterly boundary of the farm. **Figure 6** shows the approximate location of Erf 2833 in relation to the early (1814) farm boundaries along, "het wegt naar Outeniqualand" (the road to Outeniqualand). Land use within the proximity the described as "weyland" (grazing grounds).

In 1834 Hendrik and Cornelis van der Watt, sons of deceased Heemraad Cornelis van der Watt sold Wolwedans to Johannes Gerhardus Terblans⁷. In 1852 two sons of Johannes Gerhardus Terblans namely Hercules, Hendrik inherited the farm along with Daniel Terblans (Pieter's son) and Philip Peo⁸. The farm was held jointly until 1870 when Daniel Cornelius Terblans either bought or inherited one of the first subdivided portions of Wolwedans named Zandhoogte measuring 551 morgen 450 sq rds. (approximately 472 hectares). No buildings are described on the diagram, but that does not necessarily mean that none were present⁹. Between 1834 and 1902, members of the Terblans family owned and occupied the farm Wolwedans. A deeds search confirms that by the year 1902 Wolwedans was held in 160th shares, indicating that there must have been several cottages on the farm accommodating these family members.

³ The Story of Great Brak River ; Margaret Franklin pub. 1975.

⁴ Cape Town Deeds Office (CTDO): George Quitrents 1/9 dated 3rd January.

⁵ Conservation study for the villages of Groot Brak, Friemersheim, Herbertsdale and Brandwacht, N Baumann and S Winter, July 2003

⁶ SG Diagram 392/1863

⁷ CTDO: Title deed number 209/1834 dated 21st November

⁸ CTDO: Title deed number 9/1852 dated 1st December.

⁹ CTDO: Title deed number 193/1871 dated 28th January



Figure 7: Approximate location of study area in relation to 1814 SG Diagram of the early farm Wolwedans (SGO as edited).

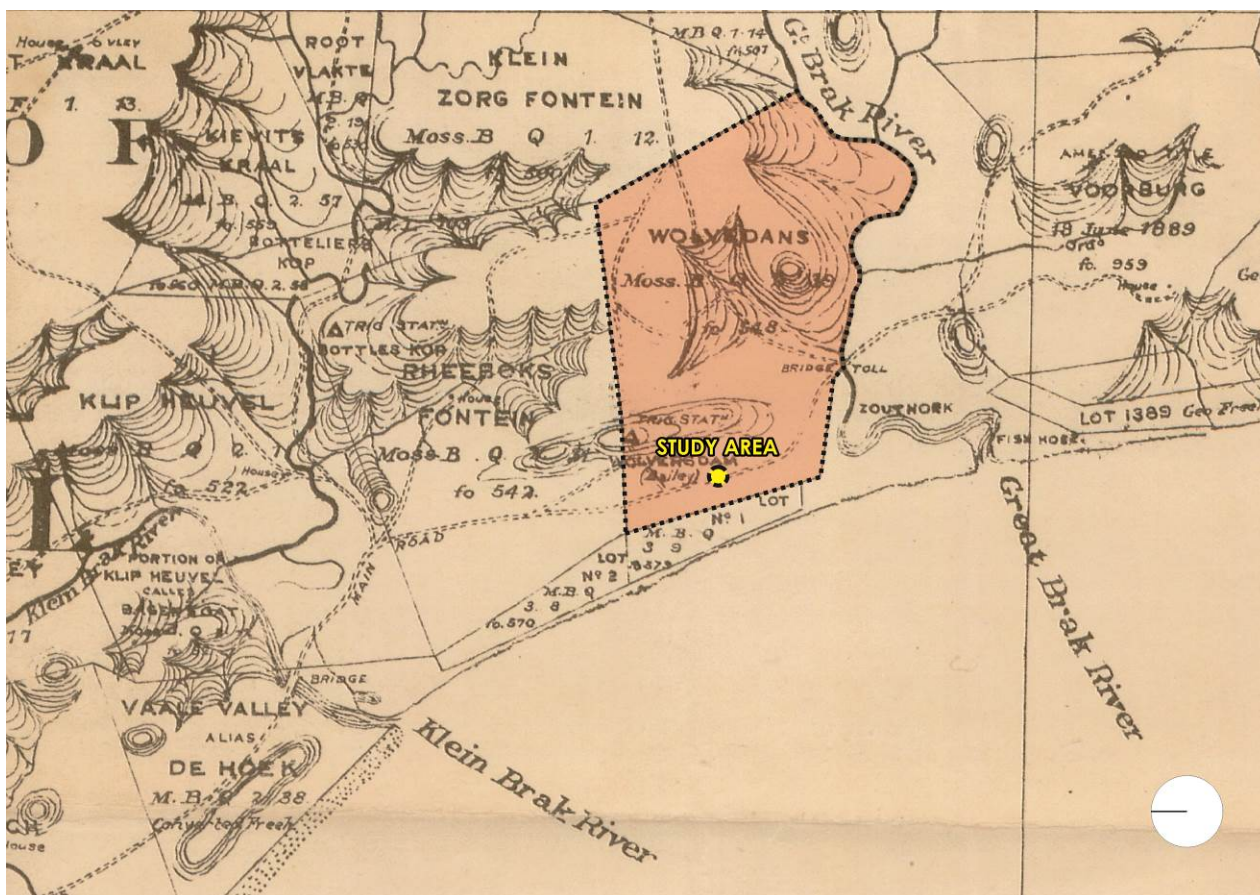


Figure 8: Location of study area in relation to the early farm Wolwedans and transposed onto 1880-1900 SG Mapping (NGSI as edited)

Figure 8 (above) shows the location of Erf 2833 along the early western approach road into Great Brak River village, and in relation to the early farm Wolvedans, as transposed onto 1880 – 1900 SG Mapping for the area.

Historic background research did not identify or highlight any other significant heritage-related aspects related to these particular land parcels. It is unlikely that detailed archival research would provide further meaningful insight into former use and/or broader understanding of heritage-related themes of the area.

6.2 Archaeology

An archaeological impact assessment (AIA) was undertaken on the property as part of an earlier proposal by a previous landowner to develop a residential estate comprising of 26 Single residential units and 24 Group Housing units (Kaplan, 2009). While HWC's comments/ decision in relation to the report could not be located, findings and recommendations following from the AIA were as follow:

"Forty-two Early Stone Age and Middle Stone Age tools were documented during the archaeological impact assessment. All the tools were found in, or just outside the boundary of a large horse paddock alongside Sandhoogte Road. Each of the occurrences has been recorded with a GPS waypoint and photographed in-situ. The tools comprise mostly flakes and chunks while one (MSA) core and one hammerstone were also found. A small cluster of MSA flakes (n = 8) was also documented. The tools, mainly isolated finds, occur in a disturbed or secondary context and have been rated as having low local significance. Several studies done in the Great Brak River area have documented low density scatters of similar types of tools. The Archaeological Impact Assessment has identified no significant impacts to pre-colonial archaeological material that will need to be mitigated prior to proposed construction activities. Early Stone Age and Middle Stone Age tools may be exposed during earth moving operations, but it is maintained that these impacts are not likely to be significant. The probability of locating important archaeological remains on the steep hill slopes of the site is also considered to be low." (Kaplan, 2009)

6.3 Palaeontology

A desktop palaeontological assessment (PIA) in relation to the proposal was undertaken by Prof Marion Bamford (Department of Witwatersrand) and is attached to this HIA as **Annexure 5**.

6.3.1 Geology and lithology

The project lies in one of the Mesozoic onshore basins along the southern coast of Soth Africa (Figure 4). Along the newly formed southern coast of South Africa, during the Late Jurassic and early Cretaceous, thick deposits accumulated in the complex graben and half-graben basins (Shone, 2006). Much of the material has since eroded away but the Uitenhage Group sediments can be found in the Mossel Bay Basin, Plettenberg Bay Basin, Gamtoos Basin and Algoa Basin. Cape Supergroup sediments underlie the Uitenhage Group and are much older. The project footprint does not intersect these older rocks or the even older intrusive granites.

The Uitenhage Group has been divided into the basal Enon Formation that is composed of large clasts of rocks from the inland together with sandstones and shales, the mostly terrestrial Kirkwood Formation composed of shales and siltstones, and the upper mixed terrestrial and marine Sundays River Formation (Shone, 2006).

Along the coast are windblown and dune sands that are difficult to date because they are transported and reworked. Generally considered to be of Quaternary age, and Holocene in the upper layers (Roberts et al., 2006), they are partially vegetated and stabilised.

6.3.2 Palaeontological Potential

The palaeontological sensitivity of the area under consideration is presented in **Figure 9**. According to the SAHRIS palaeo-technical report for the Western Cape (Almond and Pether, 2008), the Enon Formation has transported bone fragments, teeth and coalified wood. McLachlan and McMillan (1976) and Shone (1976) reported poorly preserved abraded bone fragments, silicified fossil wood and charcoaled from the Enon Formation (re-reported in Muir et al., 2017).

Since this formation has large to small boulders of different rock types that are well rounded, they have been transported from some distance inland. This means that the abraded fossils must also have been transported from some distance so they would be out of primary context. Such poorly preserved, abraded and transported fossils are of very limited scientific value.

The very highly sensitive palaeosensitivity coding for the Enon Formation should rather be downgraded to moderately sensitive (green). It is unlikely that any fossils, even poorly preserved, would be found on the land surface that is covered by soils and vegetation as is the case for the Great Brak River area according to the aerial photographs and site visit observations in the BID document.

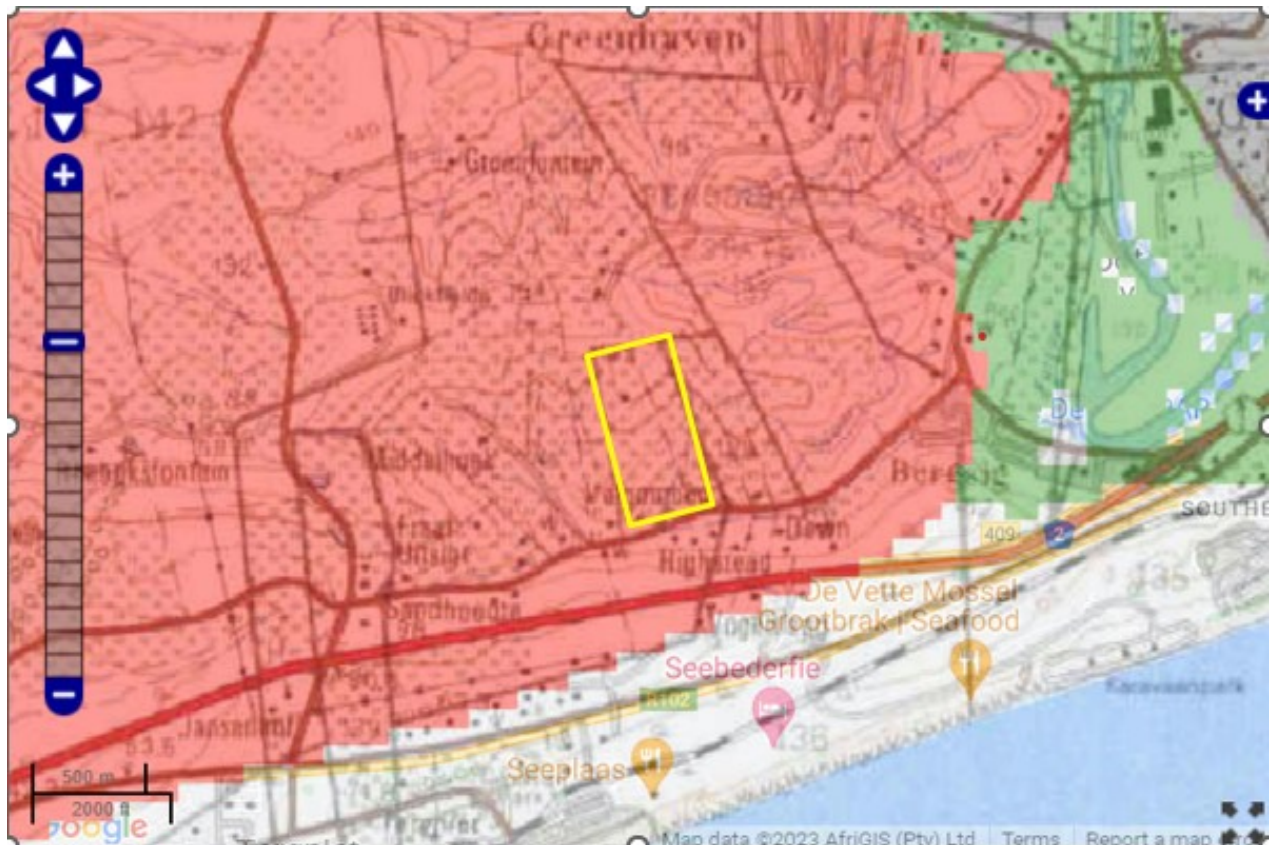


Figure 9: SAHRIS palaeosensitivity map for the site for the proposed development on a portion of RE Erf 2833, Great Brak River shown within the yellow rectangle. Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

6.4 Cultural landscape context

Although the NHRA does not clearly define the term “cultural landscape”, it briefly refers to it in the schedule of definitions. A working definition suggested by Winter, S (2004) is:

“A place of cultural significance, which engenders qualities relating to its aesthetic, architectural, historical, scientific, social, spiritual, linguistic, technological, archaeological or palaeontological value¹⁰”

The following alternative definition offers insight into the complexity of cultural landscapes from a broader, holistic perspective (Green, B.H., 1995):

“The concept of landscape gives expression to the products and processes of the spatial and temporal interaction of people with the environment. It may thus be conceived as a particular configuration of topography, vegetation cover, land use and settlement pattern which establishes some coherence of natural and cultural processes and activities”.

Cultural landscapes relate to the imprint created on a natural landscape through human habitation and cultivation over an extended period of time, as defined by a human geographer (Carl O. Sauer, 1925):

“The cultural landscape is fashioned from a natural landscape by a cultural group. Culture is the agent, the natural area is the medium, the cultural landscape is the result”.

Essentially then cultural landscapes create a broad (spatial and temporal) relational framework within which all other heritage resources are rooted. The definition of cultural landscapes therefore enables broader understanding of the spatial and spiritual evolution of a landscape over time as expressed through perceivable “patterns” or associations relating to aspects such as socio-historic aspects, land use, settlement pattern, built form, vegetation cover, topography etc.

Given the limited nature of available primary and/or secondary archival sources pertinent to the particular property, analysis of early aerial photography was found useful to inform our understanding from a cultural landscape context. While archival sources provided some insight into historic use of the study area, analysis of earliest available aerial photography (1940) does provide some insight into traditional (Pre-Modern) land use patterns.

¹⁰ Baumann & Winter Heritage Consultants (2004)



Figure 10: Approximate study area boundaries imposed onto compilation of 1940 aerial photography (Source: Flight Series 140 of 1940, NGS)

The following patterns are evident from 1940 aerial imagery (**Figure 10**):

- Imagery shows the property within an early coastal landscape context, prior to construction of the N2 National Road.
- The property's location in relation to the railway line between Mossel Bay and George, the coastal road (R102) and the western approach road to the village (i.e. Sandhoogte Road) is evident.
- *No significant structures/ buildings can be distinguished on the property.* However, several buildings are noted directly south of the Sandhoogte Road as well as further west along the valley.
- Much of the property has clearly been transformed through cultivation/ agricultural activities by this time (save for the natural valley diagonally crossing the property).
- A narrow track extending northwards from Sandhoogte Road traverses the property, following the upper slopes of the natural valley.

Intermittent views of the higher-lying portion of the property are likely to be possible from the N2 National Road though such views would be viewed within context of existing development within its direct proximity (including a visually intrusive driveway on the adjoining property (see Annexure 2). Predominant land use directly north, south, and west of the property comprise of agricultural smallholdings/ rural occupation. The area is however earmarked for urban expansion in the current Mossel May MSDF, 2022.

7. SIGNIFICANCE AND GRADING

7.1 Archaeology

An earlier AIA for the property by Kaplan (2009) recorded several Early and Middle Stone tools but he has commented that several studies completed in the Great Brak River area have documented low density scatters of similar types of stone tools. Kaplan (2009) did not consider the significance or grading of these stone tools but his conclusion, that there would be no significant impacts, indicates that he considers that they were likely to be of Grade III or NCW status.

In the event of the chance discovered of human remains, these would be of high significance at the local level (Grade IIIA).

7.2 Palaeontology

Conclusions outlined in the desktop palaeontological impact assessment undertaken by Prof Marion Bamford include the following:

- From the SAHRIS map above the area is incorrectly indicated as very highly sensitive (red). It is unlikely that any fossils occur in the soils that cover the area.
- The very highly sensitive coding for the Enon Formation should rather be downgraded to moderately sensitive (green)
- It is unlikely that any fossils, even poorly preserved, would be found on the land surface that is covered by soils and vegetation as is the case for the Great Brak Rivier area according to the aerial photographs and site observations in the BID document.

7.3 Cultural landscape context

The study area is situated within the urban edge and comprise areas already transformed/ occupied and designated for "urban expansion" in the most recent MSDF (2022). The proposal would therefore not negatively impact on any cultural landscape that may be considered of local cultural significance.

8. ASSESSMENT OF IMPACTS

8.1 Archaeology

The Archaeological Impact Assessment has identified no significant impacts to pre-colonial archaeological material that will need to be mitigated prior to proposed construction activities. Early Stone Age and Middle Stone Age tools may be exposed during earth moving operations, but it is maintained that these impacts are not likely to be significant. The probability of locating important archaeological remains on the steep hill slopes of the site is also considered to be low." (Kaplan, 2009)

8.1.1 Recommendations: Archaeology

Based on the above, it is our contention that while no further archaeological surveys are recommended, the following standard clause must apply:

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.

8.2 Palaeontology

Based on the nature of the project, surface activities may impact upon the fossil heritage if preserved in the development footprint. The geological structures suggest that the rocks are either much too old to contain fossils or are the wrong kind (soils and conglomerates). Furthermore, the material to be excavated is soil and this does not preserve fossils. Since there is an extremely small chance that transported fossils from the Enon Formation may be disturbed a Fossil Chance Find Protocol has been added to this report. Taking account of the defined criteria, the potential impact to fossil heritage resources is extremely low.

8.2.1 Recommendations: Palaeontology

Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the overlying soils of the Quaternary. There is a very small chance that fossils may occur in the underlying conglomerates of the Enon Formation so a Fossil Chance Find Protocol should be added to the EMP. If fossils are found by the environmental officer, or other responsible person once excavations for amenities, infrastructure and foundations have commenced then they should be rescued, and a palaeontologist called to assess and collect a representative sample. The impact on the palaeontological heritage would be low, as far as the palaeontology is concerned, so the project should be authorised.

8.2.2 Summary Fossil Finds Procedure

"Should fossil bones and teeth be encountered in the deposits, work must cease at the site and the works foreman and the ECO for the project must be informed immediately. Scattered, unearthened parts/fragments of the find must be retrieved and returned to the main find site which must be protected from further disturbance. Heritage Western Cape must be informed and supplied with contextual information:

- *A description of the nature of the find.*
- *Detailed images of the finds (with scale included).*
- *Position of the find (GPS) and depth.*
- *Digital images of the context. i.e. the excavation (with scales).*

HWC and an appropriate specialist palaeontologist will assess the information and liaise with the owner, the environmental consultants and the ECO and a suitable response will be established. In the event of a significant fossil find, a professional palaeontologist must be appointed to undertake the excavation of the

fossils and to record their contexts. Said palaeontologist must also undertake the recording of the stratigraphy and sedimentary geometry of the exposures and must undertake the compilation of the detailed report.

A permit from HWC is required to excavate fossils. The applicant should be the qualified specialist responsible for assessment, collection, and reporting (palaeontologist). Should fossils be found that require rapid collecting, application for a palaeontological permit will immediately be made to HWC. The application requires details of the registered owners of the sites, their permission, and a site-plan map. All fossil finds must be recorded, and the fossils and their contextual information (a report) must be deposited at a SAHRA/HWC-approved institution."

8.3 Cultural landscape

Intermittent views of the higher-lying portion of the property are likely to be possible from the N2 National Road though such views would be viewed within context of existing development within its direct proximity (including a visually intrusive driveway on the adjoining property (see Annexure 2). Predominant land use directly north, south, and west of the property comprise of agricultural smallholdings/ rural occupation. The area is however earmarked for urban expansion in the current Mossel Bay MSDF, 2022.

Given its location within the urban edge and having been earmarked for "urban expansion" in the Mossel Bay SDF (2022) (refer to Section 5 of this report), it is argued that the value of this property from a broader cultural landscape context has already been compromised and that, from this perspective, its cultural significance may be considered of no local (site-specific) cultural significance.

No specific recommendations are therefore made in this regard.

8.4 Assessment of Alternatives

The two alternatives, as well as the No-Go Option are considered below.

Heritage Resources			
Alternative	Preferred Alternative	Non-mitigated Alternative	No-Go Option
PLANNING, DESIGN AND DEVELOPMENT PHASE			
Potential impact and risk:			
Nature of impact:	Potential destruction of heritage resources	Potential destruction of heritage resources	N/A
Extent and duration of impact	Permanent	Permanent	N/A
Consequence of impact or risk	Loss of heritage resources	Loss of heritage resources	N/A
Probability of occurrence:	Low	Low	None
Degree to which the impact may cause irreplaceable loss of resources:	Low	Low	None
Indirect impacts:	None	None	None
Cumulative impact prior to mitigation:	Low	Low	N/A
Significance rating of impact prior to mitigation:	Low	Low	N/A
Degree to which impact can be avoided:	No	No	
Degree to which impact can be managed	Yes	Yes	N/A
Degree to which impact can be mitigated:	Low impacts. Fossil Finds Protocol proposed.	Low impacts. Fossil Finds Protocol proposed	N/A
Proposed mitigation:	None proposed	None Proposed	N/A
Residual impacts:	None	None	N/A
Cumulative impact post mitigation:	None	None	N/A
Significance rating of impact after mitigation:	Low	Low	N/A
OPERATIONAL PHASE			
Potential impact and risk:			
Nature of impact:	Potential destruction of heritage resources	Potential destruction of heritage resources	N/A
Extent and duration of impact	Permanent	Permanent	N/A
Consequence of impact or risk	Loss of heritage resources	Loss of heritage resources	N/A
Probability of occurrence:	Low	Low	None
Degree to which the impact may cause irreplaceable loss of	Low	Low	None

resources:			
Indirect impacts:	None	None	None
Cumulative impact prior to mitigation:	Low	Low	N/A
Significance rating of impact prior to mitigation:	Low	Low	N/A
Degree to which impact can be avoided:	No	No	
Degree to which impact can be managed	Yes	Yes	N/A
Degree to which impact can be mitigated:	Low impacts. Fossil Finds Protocol proposed.	Low impacts. Fossil Finds Protocol proposed	N/A
Proposed mitigation:	None proposed	None Proposed	N/A
Residual impacts:	None	None	N/A
Cumulative impact post mitigation:	None	None	N/A
Significance rating of impact after mitigation:	Low	Low	N/A
DECOMMISSIONING AND CLOSURE PHASE			
Potential impact and risk:			
Nature of impact:	Potential destruction of heritage resources	Potential destruction of heritage resources	N/A
Extent and duration of impact	Permanent	Permanent	N/A
Consequence of impact or risk	Loss of heritage resources	Loss of heritage resources	N/A
Probability of occurrence:	Low	Low	None
Degree to which the impact may cause irreplaceable loss of resources:	Low	Low	None
Indirect impacts:	None	None	None
Cumulative impact prior to mitigation:	Low	Low	N/A
Significance rating of impact prior to mitigation:	Low	Low	N/A
Degree to which impact can be avoided:	No	No	
Degree to which impact can be managed	Yes	Yes	N/A
Degree to which impact can be mitigated:	Low impacts. Fossil Finds Protocol proposed.	Low impacts. Fossil Finds Protocol proposed	N/A
Proposed mitigation:	None proposed	None Proposed	N/A
Residual impacts:	None	None	N/A
Cumulative impact post mitigation:	None	None	N/A
Significance rating of impact after mitigation:	Low	Low	N/A

Table 2: Impact Assessment Table comparing the Preferred Alternative with the Non-Mitigated Alternative and the No-Go Option.

The comparative assessment of impacts between the Preferred Alternative and the Non-Mitigated Alternative (Table 2) indicates that there is unlikely to be any difference in the impacts between these two options on the heritage resources of the area. However, the 2023 mitigated layout would have a lower overall developmental footprint.

8.5 Cumulative impacts

With respect cumulative impacts, it is not possible to speculate what palaeontological impacts may have occurred during development in Great Brak River prior to the implementation of the NHRA (No 25 of 1999). The few impact assessment reports which are available, suggest that impacts would have been low, and therefore cumulative impacts would also have been low.

From a cultural landscape perspective, the proposed development is similar to the existing development which surrounds the site. No cumulative impacts are anticipated to the cultural landscape of the broader Great Brak River area.

8.6 Socio-economic development

Section 38(3)(d) of the NHRA requires an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefit to be derived from the development.

The development is likely to create limited temporary employment opportunities during the construction phase though this should be viewed within the context of the findings following from this HIA essentially

concluding that the proposal is unlikely to negatively impact any significant heritage resources on the study area or its direct proximity.

9. PUBLIC PARTICIPATION PROCESS

The study area is situated within the jurisdiction of Mossel Bay Municipality and within an area covered by three local conservation bodies registered with HWC in terms of Section 25 of the National Heritage Resources Act, 1999 (Act 25 of 1999).

9.1 Scope of public participation

The public participation process (PPP) was conducted in accordance with requirements outlined in the HWC Public Consultation Guidelines, June 2019 and extended over a period of more than 30 days (8th March 2024 to 15th April 2024). Components to the public participation process included the components listed below. Proof of public consultation will be attached as part of **Annexure 6** to this report.

- Formal notice published in local press (Mossel Bay Advertiser) on 8th March 2024
- Details regarding the proposal circulated to the local planning authority (Mossel Bay Municipality);
- Details regarding the proposal circulated to the local conservation bodies (Mossel Bay Heritage, Great Brak River Museum and the Simon van der Stel Foundation: Southern Cape);
- Public notices were installed across the site for the duration of the public consultation process.

Contact details of interested and affected parties are listed in the table below.

Organisation / Department	Contact Person	E-mail
Mossel Bay Municipality (Planning & Building Control)	Mr. Raimo Fernandez	rfernandez@mosselbay.gov.za
Mossel Bay Heritage	Ms. Carina Wiggill	heritage@visitmosselbay.co.za
Great Brak River Museum	Mr. Rene de Kock	Chair.Heritage@Ourheritage.org.za
Simon v/d Stel Foundation (Southern Cape)	Dr. Natie de Swardt	natiedes@telkomsa.net

9.2 Comments received, Response

No comments were received from the planning authority (Mossel Bay Municipality) or the Great Brak River Museum.

In their response dated 12th March 2024, the **Simon van der Stel Foundation (Southern Cape)** indicated their support for the recommendation and conditions outlined in the Integrated HIA report.

In their response dated 5th April 2024, **Mossel Bay Heritage** commented as follows:

Proposed Urban development on Remainder of Ef 2833, Great Brak River Section 38 (1) of National Heritage Resources Act

The proposed rezoning of the property from Agricultural Zone I to make provision for residential development is noted.

Please receive comment as prepared by Dr Nick Walker, on the well presented HIA. The AIA is based on Kaplan's study of the same area, but unfortunately his report is missing from HWC's archives. It is suggest that another report is obtained from the author. It would thus be useful to know his survey method and how thorough it was. Pictures of the area indicate dense vegetation and thus low visibility so how was this adjusted for.

Kaplan found only low scatters of ESA and MSA tools over the study area and thus deemed the area to be of little heritage significance. Dr Walker states that It is worth pointing out that our study of the past is based on detailed research of a few home bases, yet these people spent most of their time off site. So these isolated finds reflect other activities. The southern Cape is rich in ESA but we know nothing about these people because they did not use cave sites. The Groot Brak Museum also has some fossil wood found in the area and so there is a possibility of finding more here.

A problem is that the report stipulates that, should an occurrence of archaeological or palaeontological significance be found, work must be halted and HWC notified. But who is going to recognise the find and decide whether the site is important? It has previously been proposed that building inspectors have some training in recognising archaeological and fossil finds so they can monitor trenches. Having a trained archaeologist on site for several months simply to monitor excavations is probably not worth it.

The following response to Mossel Bay Heritage's comment dated 5th April 2024 was prepared by Dr. Lita Webley:

"In response to the comments of Dr Nick Walker of Heritage Mossel Bay:

1) *"The AIA is based on Kaplan's study of the same area, but unfortunately his report is missing from the HWC's archives."*

Kaplan's (2009) Archaeological Impact Assessment report on Erf 2833 was submitted, together with other supporting documents, to Heritage Western Cape as proof of prior assessment of the property during the NID phase. HWC (23rd October 2023) responded to the NID requesting an integrated Heritage Impact Assessment comprising of a Palaeontological Impact Assessment. Due to the fact that Kaplan had already surveyed the property for archaeology (albeit in 2009), a further archaeological investigation was not requested.

For this reason, only the specialist Palaeontological Impact Assessment report was included in the HIA documents submitted for public participation. However, Perception Planning will send a copy of the Kaplan (2009) Archaeological Impact Assessment to Heritage Mossel Bay for their records.

2) *"Kaplan found only low scatters of ESA and MSA tools over the study area and thus deemed the area to be of little heritage significance. Dr Walker states that it is worth pointing out that our study of the past is based on detailed research of a few home bases, yet these people spent most of their time off site. So, these isolated finds reflect other activities".*

Dr Walker is correct in commenting that only a few open sites, comprising Early or Middle Stone Age implements in primary context, have been recovered by archaeologists. There has been some research on Middle Stone Age open sites by Arizona State University along the Vleesbaai coast (Oestmo et al 2014), but these studies are of an academic nature. It is unfortunately extremely rare for archaeologists, conducting surveys for CRM work, to discover these types of sites during the survey stage. Issues of access (i.e. dense vegetation), time and money prevent detailed assessments. HWC is reliant on the CRM archaeologists to identify the archaeological material, assess significance and recommendations for mitigation.

3) *"A problem is that the report stipulates that, should an occurrence of archaeological or palaeontological significance be found, work must be halted and HWC notified. But who is going to recognise the find and decide whether the site is important? It has previously been proposed that building inspectors have some training in recognizing archaeological and fossil finds so they can monitor trenches".*

It is unfortunately the case, that HWC can only stipulate that archaeological monitoring should take place during development when there is a reasonable probability that significant archaeological material may be uncovered or disturbed. Archaeological monitoring can incur prohibitive costs to the development, particular of they are of a small scale. In the majority of cases, HWC stipulates the "standard clause", which is that any archaeological material uncovered during development should be reported to HWC. It is not feasible for HWC to undertake archaeological training of building inspectors' due issues of time and money. It is for this reason that they rely on the members of conservation bodies to report any instances of archaeological destruction to the authorities."

The Archaeological Impact Assessment (Kaplan, 2009) in question is once more attached to this report as **Annexure 7**. The AIA report was sent to Mossel Bay Heritage for noting (see proof Annexure 6).

10. RECOMMENDATIONS

This report satisfies the requirements of Section 38(3) of the NHRA Act 25 of 1999 for a Heritage Impact Assessment, namely:


- 1) Identification and mapping of all heritage resources in the area affected;
- 2) Assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7;
- 3) Results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources.

It is recommended that HWC endorse the findings of this HIA report including the following Conditions of Approval, to be assimilated into future outcome(s) of the NEMA process currently underway:

No	Heritage Indicators/ Conditions of Approval
10.1	There is no significant difference between the two SDP assessed (Preferred Alternative and the Non-Mitigated Alternatives) in terms of heritage constraints. However, the Preferred Alternative will have a lower overall development footprint and is therefore supported.
10.2	If any human remains or significant archaeological materials are exposed during development activities, then the find should be protected from further disturbance and work in the immediate area should be halted and

	Heritage Western Cape must be notified immediately. These heritage resources are protected by Section 36(3)(a) and Section 35(4) of the NHRA (Act 25 of 1999) respectively and may not be damaged or disturbed in any way without a permit from the heritage authorities. Any work in mitigation, if deemed appropriate, should be commissioned and completed before construction continues in the affected area and will be at the expense of the developer. The above recommendations should be included in the Environmental Management Program (EMPr) for the proposed residential development.
10.3	The HWC Chance Fossil Finds Protocol to be implemented and included in the Environmental Management Programme Report.

PERCEPTION Planning
23rd April 2024



SE DE KOCK
 Hons (TRP) EIA Mgmt (IRL) PrPIn PHP

PROJECT TEAM AND STATEMENT OF INDEPENDENCE

With relation to the authors' appointment as an independent specialist responsible for the compilation of an Integrated Heritage Impact Assessment in terms of Section 38(3) of the National Heritage Resources Act, 1999 (Act 25 of 1999) for this project, it is hereby declared that the undersigned:

- Acts as an independent specialist in this application;
- Regards the information contained in this report as it relates to my specialist input/study to be true and correct;
- Have and will not have any vested interest in the proposed activity proceeding;
- Does not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the NEMA, the Environmental Impact Assessment Regulations, 2014 and any specific environmental management Act;
- Have disclosed, to the applicant, EAP and competent authority, any material information that have or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the NEMA, the Environmental Impact Assessment Regulations, 2014 and any specific environmental management Act;
- Is fully aware of and meet the responsibilities in terms of NEMA, the Environmental Impact Assessment Regulations, 2014 (specifically in terms of regulation 13 of GN No. R. 982) and any specific environmental management Act, and that failure to comply with these requirements may constitute and result in disqualification;
- Is aware that a false declaration is an offence in terms of regulation 48 of GN No. R. 982.

It is certified that SE de Kock has 25 years' professional experience as urban planner (3 years of which were abroad) and 15 years' experience as professional heritage practitioner. He is professionally registered/ affiliated as follows:

- Professional Heritage Practitioner (Association for Professional Heritage Practitioners)
- Professional Planner (South African Council for Planners, South African Planning Institute)

Dr Lita Webley is a professional member of the Association of Southern African Professional Archaeologists (ASAPA) since 1989, including the Cultural Resource Management section of the same association (ASAPA professional member # 175). She is an accredited Principal Investigator for Stone Age archaeology, coastal & shell midden archaeology and Colonial Period archaeology, Field Director for Grave Relocation.

Dr Marion Bamford holds a PhD in Paleobotany (University of the Witwatersrand, 1990) and is a professional member of, *inter alia*, the Palaeontological Society of Southern Africa, the Royal Society of Southern Africa (2006) and the International Organization of Palaeobotany (1993). Presently, she is a Professor; Director of the Evolutionary Studies Institute, a Member of the Management Committee of the NRF/DST Centre of Excellence Palaeosciences, University of the Witwatersrand, Johannesburg.

Contributing heritage specialists' Declarations of Independence are contained in their respective reports.

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