## BACKGROUND INFORMATION DOCUMENT TO NOTICE OF INTENT TO DEVELOP (NID) IN TERMS OF SECTION 38(8) OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999)

PROPOSED UPGRADING OF GREAK BRAK RIVER SEWER INFRASTRUCTURE (SANDHOOGTE ROAD, STANDER STREET, EBENEZER AVENUE, WIGGET STREET, FOURIE STREET, VAN RENSBURG STREET, LONG STREET AND KERK STREET), MOSSEL BAY DISTRICT AND MUNICIPALITY



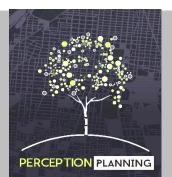
## **ON BEHALF OF: MOSSEL BAY MUNICIPALITY**

## **NOVEMBER 2024**

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## **PERCEPTION Planning**

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

- 1. INTRODUCTION
- 1.1 Previous applications
- 2. DESCRIPTION OF STUDY AREA
- 3. DEVELOPMENT DESCRIPTION
- 3.1 New Ø160mm sewer pipeline
- 3.2 New Ø355mm sewer pipeline
- 3.3 Short new Ø160mm sewer pipelines
- 3.4 Upgrading of Cricket Field Pumpstation
- 4. FOCUSSED HISTORIC BACKGROUND
- 4.1 Brief account of the early history of Groot Brak
- 4.2 Early farm Wolvedans
- 5. HERITAGE RESOURCES AND ISSUES
- 5.1 Cultural landscape context
- 5.2 Archaeology
- 5.3 Palaeontology
- 6. RECOMMENDATION

## REFERENCES AND ACKNOWLEDGEMENTS

## ANNEXURES

- 1. Power of Attorney/ Mandate
- 2. Previous HWC comments within proximity of study area
- 3. Photographs
- 4. Site Development Plan (Engineering drawings)
- 5. Desktop PIA: Erf 2833, Great Brak River

#### FIGURES

- 1. Locality, sub-regional context
- 2. Study area Long Street, historic buildings
- 3. Study area Sandhoogte Road, historic buildings
- 4. Extract: 1880-1900 SG mapping
- 5. Extract: 1957 aerial imagery
- 6. SAHRIS Paleo-sensitivity mapping

#### **ABBREVIATIONS**

- 1. DEADP Department of Environmental Affairs & Development Planning (WCG)
- 2. DOI Department of Infrastructure (WCG)
- 3. EA Environmental Authorization
- 4. HIA Heritage Impact Assessment
- 5. HWC Heritage Western Cape
- 6. NGSI National Geo-Spatial Information, Department of Rural Development and Land Reform, Mowbray
- 7. NHRA National Heritage Resources Act, 1999 (Act 25 of 1999)
- 8. PHS Provincial Heritage Site
- 9. SAHRIS South African Heritage Resources Information System
- 10. VIA Visual Impact Assessment
- 11. WCG Western Cape Government

COVER: Collage of images of the study area, surrounds (Author, 2024)

## 1. INTRODUCTION

PERCEPTION Planning was appointed by Eric Louw (SA ID 731224 5185 089), being the Representative/ person holding mandate on behalf of Mossel Bay Municipality (being the Developer) to submit to Heritage Western Cape (HWC) a Notice of Intent to Develop (NID) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act 25 of 1999) in relation to the proposal as outlined in this application. Copies of the Proxy/ Mandate and Power of Attorney are attached as part of **Annexure 1**.

## 1.1 Previous applications

The following applications undertaken by us in terms of Section 38 of the NHRA are considered relevant to the subject proposal. Copies of HWC's comments in respect of these applications are attached as part of **Annexure 2** hereto.

HWC Ref	NHRA Section	Proposal/ Property description	Application status	Decision outcome/ date
131208RN35E (January 2014)	38(8)	Proposed upgrading of sewer and stormwater infrastructure across Erven 305, 1830 & 1434, Great Brak River	Project implemented	No further heritage studies
HWC23090702SB1013 (July 2024)	38(8)	Proposed Urban Development on Remainder of Erf 2833, Great Brak River	Await DEADP decision	Integrated HIA required & approved

## 2. DESCRIPTION OF STUDY AREA

The subject study area mainly follows existing road reserves within the village of Great Brak River and include the Sandhoogte Road, Stander Street, Ebenezer Avenue, Wigget Street, Fourie Street, Van Rensburg Street, Long Street and Kerk Street, all of which define the western portion of the village and are situated north of the N2 National Road (**Figure 1**). Older roads contributing to the settlement morphology of the village and thus of cultural significance include Long Street and the Sandhoogte Road.

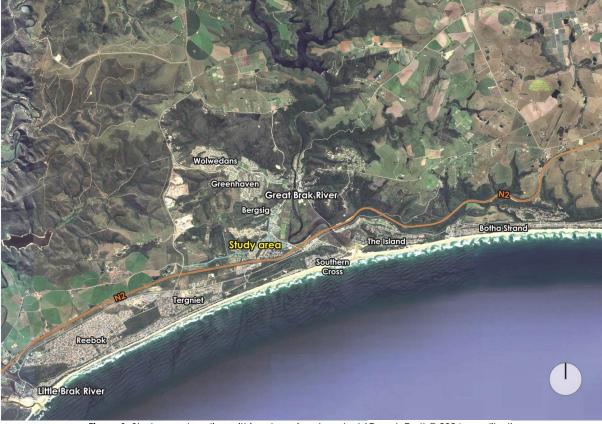


Figure 1: Study area location within sub-regional context (GoogleEarth© 2024 as edited).

The study area would traverse a substantial number of cadastral land units and mostly includes publicly owned land such as existing tar roads, pedestrian walkways and municipal sports fields as illustrated through Figures 2 and 3. Existing land use along the study area varies greatly but along the Sandhoogte Road broadly includes (from west to east) includes agricultural fields, smallholdings, recently approved urban development, established higher density residential development and business uses. Similarly, existing land use along Long Street is mixed and includes (from north to south) community and recreational uses, sports fields, business and

commercial uses, various forms of residential development ending at the Great Brak River SAPS to the south. Fieldwork included a foot survey along the entire route alignment and was undertaken on 4<sup>th</sup> November 2024. While some buildings older than 60 years were noted, most of these have been altered through various interventions. No Provincial Heritage Sites occur within the proximity of the study area.

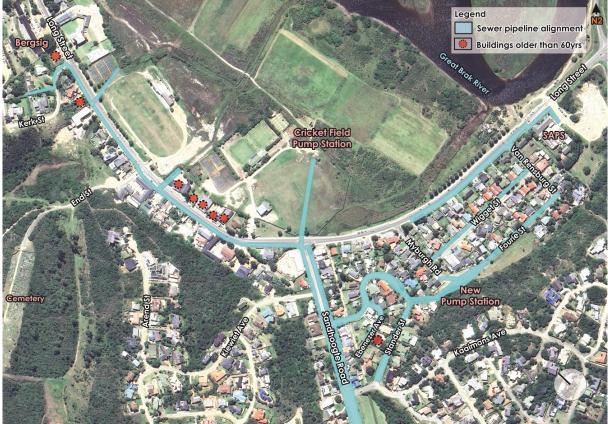


Figure 2: Eastern section of study area within proximity of Long Street (GoogleEarth© 2024 as edited).

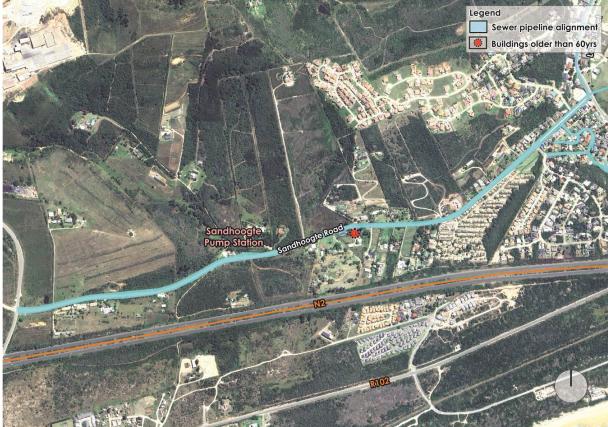


Figure 3: Western section of study area along the Sandhoogte Road (GoogleEarth© 2024 as edited).

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

## 3. DEVELOPMENT DESCRIPTION

According to information made available<sup>1</sup> the proposal entails upgrading of a portion of the existing Great Brak River sewer system by Mossel Bay Municipality. Detailed engineering drawings are attached as part of **Annexure 4** to this report.

The proposed upgrading comprises of the following four components:

- 1. Installation of new Ø160mm sewer pipeline along un-serviced erven.
- 2. Installation of new Ø355mm sewer pipeline along Sandhoogte Road and upgrades at the existing Sandhoogte Pumpstation.
- 3. Installation of new Ø160mm sewer pipelines along Lang Street and Kerk Street and,
- 4. Upgrading of the existing "Cricket Field" Pumpstation.

## 3.1 New Ø160mm sewer pipeline:

The purpose of this section is to replace numerous conservancy tanks for un-serviced erven within this residential area. The pipeline will be installed along Stander Street, Ebenezer Avenue, Wigget Street, Fourie Street, Van Rensburg Street, Long Street and Kerk Street to the existing municipal sewer network (Figure 2). Much of this new sewer line will be installed within existing tar roads and beneath paved sidewalks traversing the residential area. A short section will extend from Stander Street, through two erven where a new pump station is proposed (Figure 2).

## 3.2 New Ø355mm sewer pipeline:

The proposal to install a new Ø355mm gravity sewer pipeline is to accommodate future development along the Sandhoogte Road. Once installation is completed, the existing Ø200mm sewer pipeline along the same route will be decommissioned. Existing pumps at Sandhoogte Pumpstation will be upgraded to a flow rate of 1201/s each. The current footprint of Sandhoogte Pumpstation will not be increased and all upgrades will be internal (mechanical to pumps only). The new gravity sewer line flow directly towards the Cricket Field Pumpstation (from where sewage is pumped back along Sandhoogte Road, to the WWTW located to the West). The sewer line will be installed within the road reserve of Sandhoogte Road and / or the building line of neighbouring properties depending on more detailed design and specialist studies.

## 3.3 Short new Ø160mm sewer pipelines:

Two new short Ø160mm sewer pipelines are proposed along Long Street and Kerk Street. The sewer line along Kerk Street will be constructed within the road reserve while the new sewer line along Long Street will be constructed underneath the existing pedestrian walkway.

## 3.4 Upgrading of Cricket Field Pumpstation:

This existing pumpstation will be upgraded to accommodate additional sewer from the proposed new pumpstation (1 above) as well as the new Ø355mm gravity sewer pipeline along Sandhoogte Road (2 above). The proposed works will include internal reconfiguration of sumps and upgrading of existing pumps to a flow rate of 1201/s, which upgrades will require an area of approximately 100m<sup>2</sup>. Note that this pump station is located within what is deemed the Great Brak Estuary/Floodplain.

	Proposed development	Approx. Development Footprint(m <sup>2</sup> )
1	new Ø160mm sewer pipeline to connect to unserviced erven	
2	new Ø355mm sewer pipeline along Sandhoogte Road	±4,400m²
3	new Ø160mm sewer pipeline along Long and Kerk Streets	
4	Upgrades to Cricket Field Pumpstation	±100m <sup>2</sup>
5	Upgrades to Sandhoogte Pumpstation	Remains within existing footprint
6	New pumpstation at corner Fourie & Myburgh Streets	±50m²

Table: Summary: Approximate development footprint of proposed works (CapeEAPrac, 2024).

## 4. FOCUSSED HISTORIC BACKGROUND

Historical background research focussed on relevant primary sources obtained in the George Museum Archives, Cape Town Archives as well as other primary and secondary sources.

## 5.1 Brief account of the early history of Groot Brak

From a colonial perspective, the village of Great Brak River was developed on land that formed part of the north-easterly expansion of the (Dutch) Cape Colony (18<sup>th</sup> and early 19<sup>th</sup> century). Early farms during this period, used primarily for grazing and hunting, included e.g. Wolwedans (1731), Voorburg (1748), Rheeboksfontein (1762) and Sorgfontein (1779).

<sup>&</sup>lt;sup>1</sup> CapeEAPrac, 2024

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 Wolvedans. The date of the establishment of the outspan site has not been confirmed 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 sanctioned 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 to formalise use of land for hunting and grazing purposes.

Wolwedans (**Figure 4**) 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. From this time onward the village has been well known for making shoes and tanning leather<sup>2</sup>.

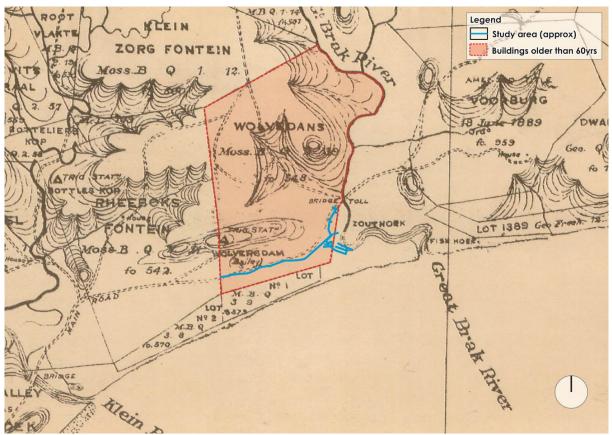


Figure 4: Approximate location of study area within context of the early farm Wolvedans and 1880-1900 SG mapping for the Great Brak River area (NGSI as edited).

Early industrial development in the village included the construction of water furrows in 1874, establishment of a water-driven corn mill in 1975 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. A railway line crossing the Great Brak River was constructed in 1906.

<sup>&</sup>lt;sup>2</sup> The Story of Great Brak River; Margaret Franklin pub. 1975.

#### 5.2 Early farm Wolvedans

The land on which the westerly portion of the village of Groot Brak was established was deducted off the farm Wolvedans, granted to 'Heemraad' Cornelis van der Watt in 1815<sup>3</sup>. It is stated on the quitrent grant that Cornelis van der Watt had been occupying the farm previously on loan via the Dutch East India Company loan system. The extent of Wolvedans was 2632 morgen (2254 hectares). The Groot Brak River formed the easterly boundary of the farm. In 1834 Hendrik and Cornelis van der Watt, sons of deceased Heemraad Cornelis van der Watt sold Wolvedans to Johannes Gerhardus Terblans<sup>4</sup>.

In 1852 two sons of Johannes Gerhardus Terblans namely Hercules, Hendrik inherited the farm along with Daniel Terblans (Pieter's son) and Philip Peo<sup>5</sup>. 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 1870 diagram, but that does not necessarily mean that none were present<sup>6</sup>.

While the study area is therefore intrinsically linked to the early establishment and development of the village Great Brak River, basic historical background research did not identify or highlight any significant heritagerelated aspects related to the study area that would be negatively impacted through the proposed development. It is unlikely that additional archival research would provide further meaningful insight within the context of this application.

## 5. HERITAGE RESOURCES AND ISSUES

#### 5.1 Cultural landscape context

Analysis of early (1940) aerial photography for the study area was found useful to inform our understanding from a cultural landscape context. From this analysis the following traditional (i.e. Pre-Modern) cultural landscape patterns emerge, as summarized below. **(Figure 5)** 



Figure 5: Extract from 1940 aerial imagery showing the alignment of the study area (NGSI, Aerial survey 140, Image 34189, as edited).

• The (low resolution) image precedes construction of the N2 National Road. However, the old coastal road (R102) as well as the railway line connecting George and Mossel Bay are evident.

<sup>&</sup>lt;sup>3</sup> Cape Town Deeds Office (CTDO): George Quitrents 1/9 dated 3<sup>rd</sup> January.

<sup>&</sup>lt;sup>4</sup> CTDO: Title deed number 209/1834 dated 21st November

<sup>&</sup>lt;sup>5</sup> CTDO: Title deed number 9/1852 dated 1<sup>st</sup> December.

- Long Street and eastern section of the Sandhoogte Road are seen with slightly different early alignments.
- The image precedes the existing residential neighbourhood south of Long Street (comprising Fourie, Stander and Wigget Streets as well as Ebenhezer Avenue). However, the presence of several narrow market lots with modest cottages along the southern edge of these, at the foothill of a northeast facing hillside are evident. None of these cottages appear to survive in present day. A single (altered) historic building bound by Ebenhezer Avenue and Stander Street (noted on Figure 2) remains.
- Agriculture/ cultivation is predominant along the Sandhoogte Road with an overall low density of buildings almost all of which form part of smallholding and are set back from the road.
- Several buildings are evident along Long Street (northern section of the study area) with most set back from the road. Many of these early buildings have either been demolished or have been altered through inappropriate interventions.

During fieldwork it was noted that most of the remaining historic buildings along Long Street and the Sandhoogte Road have either been demolished or altered through inappropriate interventions over the years, to the extent that little of the historic (authentic) streetscape qualities remain within the proximity of the study area. The proposed works would mostly be for the installation of underground infrastructure along existing roads and pedestrian pavements, which would be returned to its current state following construction. Only limited expansion to existing infrastructure (e.g. two existing pumpstations) would be required, none of which would negatively impact what remains of the cultural landscape context within Great Brak River.

## 5.2 Archaeology

This preliminary archaeological statement was undertaken by independent archaeologist, Dr. Lita Webley.

## Pre-colonial archaeology

There have been no archaeological research projects in the vicinity of the development area. The closest significant archaeological sites are those of Pinnacle Point, near Mossel Bay, about 19km to the south of the study area. This World Heritage site is located on the coast, while the study area is located inland from the coastline.

In his review of archaeological information for Erf 2833, which is located alongside Sandhoogte Road, Kaplan (2009) notes that several archaeological studies have been conducted in the Great Brak River area, and that low density scatters of Early Stone Age (ESA) and Middle Stone Age (MSA) artefacts have been recovered in the past (Kaplan 2003, 2004 & 2008) from the inland area. In his survey of Erf 2833, he recovered forty-two (42) ESA and MSA stone tools. They were all recovered from the boundary of the property alongside Sandhoogte Road. He did not find any formal tools, such as ESA handaxes, or MSA points. In his survey for the refurbishment of a trench further north of the study area, Nilssen (2010) also commented on finding ESA and MSA stone artefacts associated with a trench and in secondary context. Kaplan (2003) surveyed a portion of the farm Rensburg Estate also a few kilometres to the north-west of the study area. No archaeological remains were recovered.

Stone Age shell middens have been recorded from the coast and may also occur upstream along the Great Brak River. Kaplan (1996) recorded a low-density scatter of LSA material on the sea-facing slope of the planned Hersham Beach Development, in association with a very thin scatter of fragmented brown mussel, white mussels and limpets. The site, some 10km from the coast, was also associated with pottery. In his mitigation proposals, he recommended a controlled collection of stone tools and pottery from the surface scatter. As a result of these recommendations, Kaplan conducted trial excavations at Hersham Beach in 1998. However, this report is not available on SAHRIS.

In general, the reports conducted in the surrounding areas suggest scatters of ESA and MSA in disturbed lands and higher incidence of LSA shell middens closer to the coast. The surveys all commented on the dense vegetation which made survey work difficult.

#### Historical Archaeology

In his survey of Erf 3933, Kaplan (2008) recorded an historic water furrow (circa 1940), that provided irrigation water to cottages in Great Brak River. Further information on the route of the furrow is not available.

#### Rock Art

No rock art is expected along the road reserve in this area. It is not close to any hilly areas or rocky outcrops which could provide suitable located for rock paintings or engravings.

#### Graves

According to Morris (1992), a number of human remains from the Great Brak River area are currently stored at the National Museum in Bloemfontein and at the Iziko Museum in Cape Town. At least four individuals were excavated by a Mr Groenewald from a cave at Great Brak River and accessioned by TF Dreyer in 1936. No further information is available. The human remains at Iziko also have no associated information.

#### Significance of archaeological resources

With respect to the forty-two ESA and MSA stone artefacts which Kaplan (2008) found on the Sandhoogte Road, he comments: the tools are likely to have been recovered from disturbed or secondary context (because of the transformed nature of the receiving environment) and for this reason "these impacts are not likely to be significant", in other words Not Conservation Worthy (NCW).

## **Comments on Potential Archaeological Impacts**

Scatters of ESA and MSA may be recovered from the study area. However, it is important to note that the remains will be in the road reserve, or along the route of the existing sewer pipelines, and that the soil in the area will be significantly disturbed. For this reason, further archaeological surveys are not recommended.

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.

## 5.3 Palaeontology

According to SAHRIS Palaeontological sensitivity mapping (**Figure 6**), much of the study area forms part of an area highlighted as being of very high palaeontological sensitivity (red) where "field assessment and protocol for finds is required" with only the easternmost section (roughly east of Long Street) designated as being of moderate palaeontological sensitivity (green) where "a desktop study is required".<sup>7</sup>

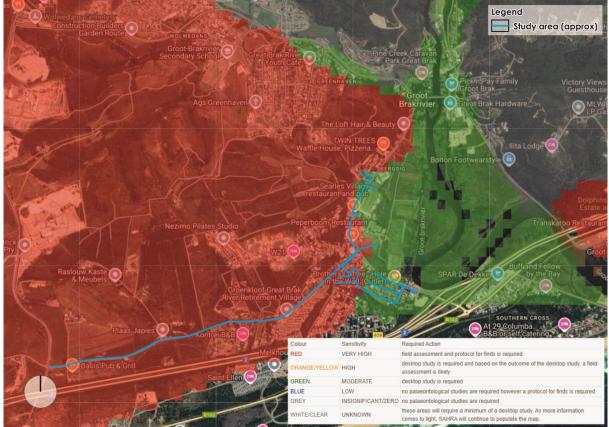


Figure 6: Extract from SAHRIS Paleo-sensitivity mapping for the study area (SAHRIS, as edited).

A desktop palaeontological impact assessment (PIA), undertaken by Prof Marion Bamford (Department of Witwatersrand) as part of the Integrated HIA with relation to the proposed development of Erf 2833, Great Brak River (HWC Ref. HWC23090702SB1013) is considered relevant within the context of the proposals but forward in this application and is therefore attached as **Annexure 5** to this report. The findings and recommendations from the report are summarized below for ease of reference:

"The project lies in one of the Mesozoic onshore basins along the southern coast of South Africa. Along the newly formed southern coast of South Africa, during the Late Jurassic and early Cretaceous, thick

<sup>&</sup>lt;sup>7</sup> https://sahris.sahra.org.za/map/palaeo, accessed 6<sup>th</sup> November 2024

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 insect 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.

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 charcoalified 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."

Based on the above and the fact that proposed works would mostly only affect formerly disturbed/ established urban areas, it is considered unlikely that the proposal would impact palaeontological occurrences of high local cultural significance. It is however that the standard precautionary clause be implemented.

#### 5.4 Conclusion

The proposed development includes the upgrading/ installation of engineering infrastructure aimed at preventing environmental pollution, ensure public health and to make provision for future urban development within the Great Brak River basin. Based on fieldwork, historic background research and the literature review undertaken as part of this assessment it is our view that no heritage resources of cultural significance (i.e. built environment, cultural landscape, archaeology, or palaeontology) would be impacted through the proposed development.

## 6. **RECOMMENDATION**

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 be warranted in this instance. However, future works will be subject to the following standard clause:

If any palaeontological materials, human remains or significant archaeological materials are exposed during development activities, then such find(s) must 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.

**PERCEPTION Planning** 

7<sup>th</sup> November 2024

STEFAN DE KOCK Hons: TRP(SA) EIA Mgmt (IRL) Pr PIn PHP

## **REFERENCES and ACKNOWLEDGEMENTS**

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- 14. Cape EAPrac. 2024. Notice of Intent to Submit an Application for Environmental Authorisation for Great Brak Sewer System Upgrades along Sandhoogte Road, Stander Street, Ebenezer Avenue, Wigget Street, Fourie Street, Van Rensburg Street, Long Street and Kerk Street, Great Brak River, Western Cape Province.

PERCEPTION PLANNING

Fax: 086 510 8357 Cell: 082 568 4719 E-mail: <u>perceptionplanning@gmail.com</u> www.behance.net/perceptionplanningSA CC Reg. No. 2003/102950/23

Our ref: GBR/Sewer Lines/NHRA/2024 Your ref:

8<sup>th</sup> April 2025

C/o Cape Environmental Assessment Practitioners (Pty) Ltd PO Box 2070 GEORGE 6530 Attention: Mariska Byleveld,

# NOTICE OF INTENT TO DEVELOP IN TERMS OF SECTION 38(8) OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999): PROPOSED SEWER INFRASTRUCTURE ACROSS VARIOUS PROPERTIES (GREAT BRAK RIVER), MOSSEL BAY DISTRICT AND MUNICIPALITY (CASE NO. HWC24110801CSI1120)

- 1. Your e-mail request dated 18<sup>th</sup> March 2025 regarding two further, more recent alternative infrastructure options that had not formed part of the development description outlined in the original application (Notice of Intent to Develop in terms of Section 38(8) of the National Heritage Resources Act (No. 25 of 1999) adjudicated by Heritage Western Cape, refer.
- 2. In their comments dated 13<sup>th</sup> December 2024 regarding the previous NID application (Case No. HWC24110801CSI1120) Heritage Western Cape agreed that no further heritage-related studies would be required.
- 3. Based on the information provided the more recent alternative options, which did not form part of the above NID application, relate to proposed upgrading of the Cricket Pump Station located on Erf 4808, Great Brak River, namely:

Alternative 1a – Decommissioning of the existing pump station and construction of new pump station directly adjacent (blue circle on figure below);

Alternative 1b - Construction of new pump station adjoining the existing tennis courts (yellow circle on figure below).

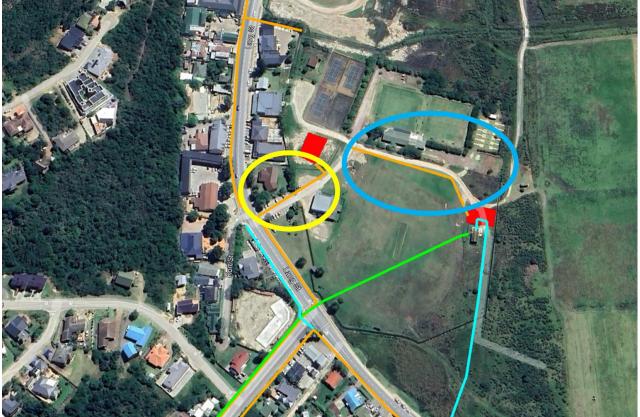


Figure: Alternative options for new pump stations being considered as part of the NEMA process, not previously considered (CapeEAPrac, 2025).

- 4. During a site visit undertaken on 7<sup>th</sup> April 2025 it was noted that the above alternatives would not impact any heritage resources and that, in our view, these would not require heritage-related studies. Note however that this professional opinion does not replace or purport to be comments/ a decision from the relevant provincial heritage resources authority, Heritage Western Cape.
- 5. It is trusted that you find the above in order. Please do not hesitate to contact the writer, should any additional information be required.

Yours faithfully, **PERCEPTION Planning** 

STEFAN DE KOCK Hons: TRP(SA) EIA Mgmt(IRL) Pr. PIn PHP

- 2