

**INTEGRATED HERITAGE IMPACT ASSESSMENT IN TERMS OF SECTION 38 OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999): PROPOSED RESIDENTIAL DEVELOPMENT ON A PORTION OF GANSE VALLEI 444/38 (PLETTENBERG BAY) KNYSNA DISTRICT AND BITOU MUNICIPALITY**



On behalf of: True Motives 99 (Pty) Ltd

March 2023

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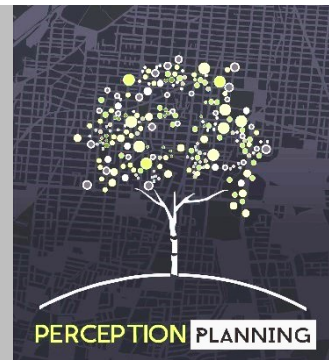
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**ABBREVIATIONS:**

AIA – Archaeological Impact Assessment  
APM – Archaeology, Palaeontology and Meteorites Committee of Heritage Western Cape  
BELCOM – Built Environment & Landscape 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 images taken and compiled by the author.

## 1. INTRODUCTION

PERCEPTION Planning was appointed by **Nils Brink van Zyl** (SA ID 5205235096088) on behalf of **True Motives 99 (Pty) Ltd** (being the representative of the Registered Landowner) to compile and submit to Heritage Western Cape for consideration an integrated Heritage Impact Assessment (HIA) as required with HWC's Interim comments dated 4<sup>th</sup> November 2022. A copy of the Power of Attorney as well as copies of the relevant Title Deed and SG Diagram are attached as part of **Annexure 1** to this report.

The cadastral land unit subject to this application is:

- Portion 38 of the farm Ganse Vallei 444 (Plettenberg Bay), Knysna District and Bitou Municipality, measuring 8.5805 ha, registered to True Motives 99 (Pty) Ltd and held under title deed T 20048/2002.

### 1.1 Previous (2009) NID application

During 2009 a NID application with relation to the proposed development of a boutique hotel on this property was submitted to HWC by Perception Planning on behalf of the previous landowner. At the time development on the property included the existing residential dwelling, existing driveways as well as a cleared area used as paddocks in the southeast corner of the property as evident on Google Earth imagery up until November 2010. When considered by HWC's BELCOM on 29<sup>th</sup> January 2009 the proposal was endorsed (see **Annexure 2**) subject to the following condition:

- If any archaeological material is discovered during earth moving activities all work must be stopped and HWC must be notified immediately.

An Archaeological Impact Assessment (AIA) regarding the same proposal, undertaken by Dr Peter Nilssen, was submitted to the APM Committee of HWC on 1<sup>st</sup> April 2009 (Case Number 37/ROD ID 275) and they agreed (**Annexure 2**) that:

- The recommendations in the AIA were accepted.
- The proposal was approved subject to the Palaeontological scoping study (as per the February ROD from HWC).

A Desktop Palaeontological Impact Assessment (PIA) compiled by Dr John Pether was submitted to the APM Committee of HWC on 2<sup>nd</sup> June 2009 (Case No 37/ROD ID 418) and it was agreed (**Annexure 2**) that:

- Archaeological monitoring of bulk earthmoving activities must take place.
- The Archaeologist must report any occurrences of fossils and a Palaeontologist must record the exposed sections before the trenches are closed up.

The development proposal did not proceed, and the property (as well as the holding company True Motives 99 (Pty) Ltd) was recently sold to the current shareholders.

### 1.2 Most recent (2022) NID application

The property was recently purchased by the current owner and a new development proposal is currently under consideration (i.e. the subject of this application process). Following submission of a Notice of Intent to Develop in respect of the proposed development of the property during October 2022, HWC on 4<sup>th</sup> November 2022 (**Annexure 2**) responded as follows [sic]:

*"Heritage Western Cape is in receipt of your application for the above matter received. This matter was discussed at the Heritage Officers Meeting held on 31 October 2022. You are hereby notified that, since there is reason to believe that the proposed development of housing and associated facilities on Ptn 38 farm 444, 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. 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:*

- Archaeology 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 4<sup>th</sup> November 2022 whilst adhering to the requirements specified in terms of Section 38(3) of the NHRA.

## 2. DESCRIPTION OF THE STUDY AREA

The subject property (8.5805 ha in extent) is situated  $\pm 3.75$ km northeast of the Plettenberg Bay town centre,  $\pm 476$ m east of the N2 National Road and directly west from the confluence of the Bitou and Keurbooms Rivers (**Figure 1**). Vehicular access is from Rietvlei Road (off the N2). The property is bound by the Goose Valley golf/ residential estate to the east and southeast, the more compact Quartet retirement estate to the northwest and the low-density Meadows Country Estate to the north. During recent years, a commercial/ industrial node has become established at the N2/ Rietvlei Road intersection,  $\pm 538$ m northwest of the property (**Figure 2**).



**Figure 1:** Study area location within broader urban context (GoogleEarth, 2022, as edited)

The property forms part of an undulating coastal (riverine) landscape comprising the generally higher-lying western portion and the lower-lying eastern half, the latter of which essentially forms part of the Keurbooms River Estuary. These two distinct areas are separated by a steep slope densely overgrown by indigenous coastal vegetation. The topography is shown through the contours illustrated in **Figure 4**. Existing (modern) development on the western portion includes the boundary fencing, the single vehicular entrance, driveway main dwelling (located on top of a dune plateau overlooking the estuary and surrounding areas) as well as a dilapidated outbuilding (former stable/ store).

A public access point and small parking area at the very eastern end of Rietvlei Road is located along the northern property boundary. From here an informal public footpath traverses the eastern portion of the property as highlighted in **Figure 3**. The eastern portion of the property therefore remains undeveloped save for the footpath as well as a palisade fence along bottom of the aforementioned steep slope (Figure 3). There are no known structures or sites of local or regional cultural significant situated with its direct proximity. Photographs of the property and its direct environs are attached as part of **Annexure 3** to this report.



Figure 2: Subject property within existing urban/ landscape context (GoogleEarth, 2022, as edited)

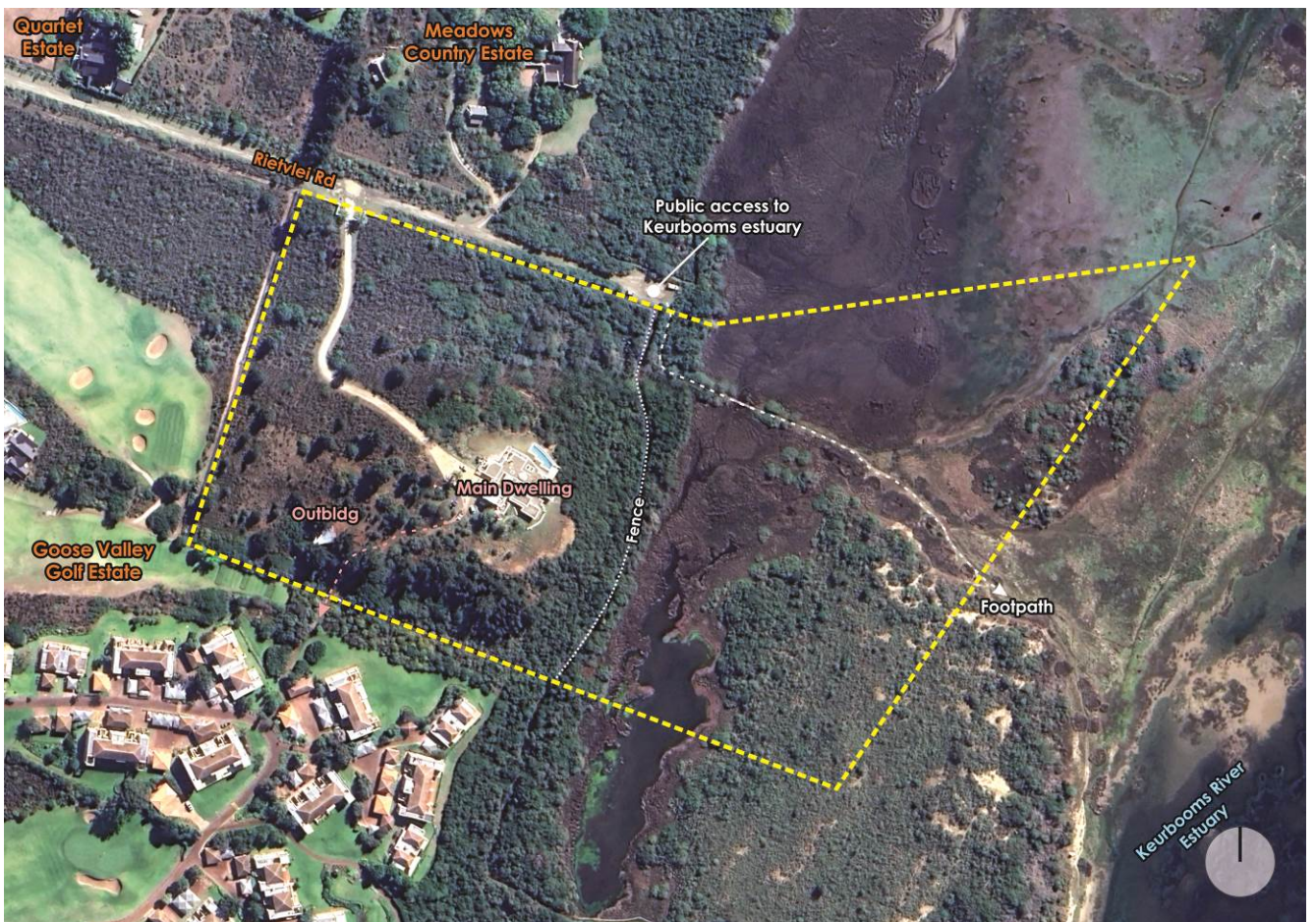


Figure 3: Existing features noted during field work (CFM, 2021, as edited)



**Figure 4:** Topography of the property showing existing main dwelling located on the highest portion with moderate sloping land to the north and northwest and steep slope to the east beyond which is the Keurbooms River estuary (CFM, 2021 as edited).

**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 HWC<sup>1</sup> 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

<sup>1</sup> Grading: Purpose and Management Implications, Heritage Western Cape, 16<sup>th</sup> March 2016

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

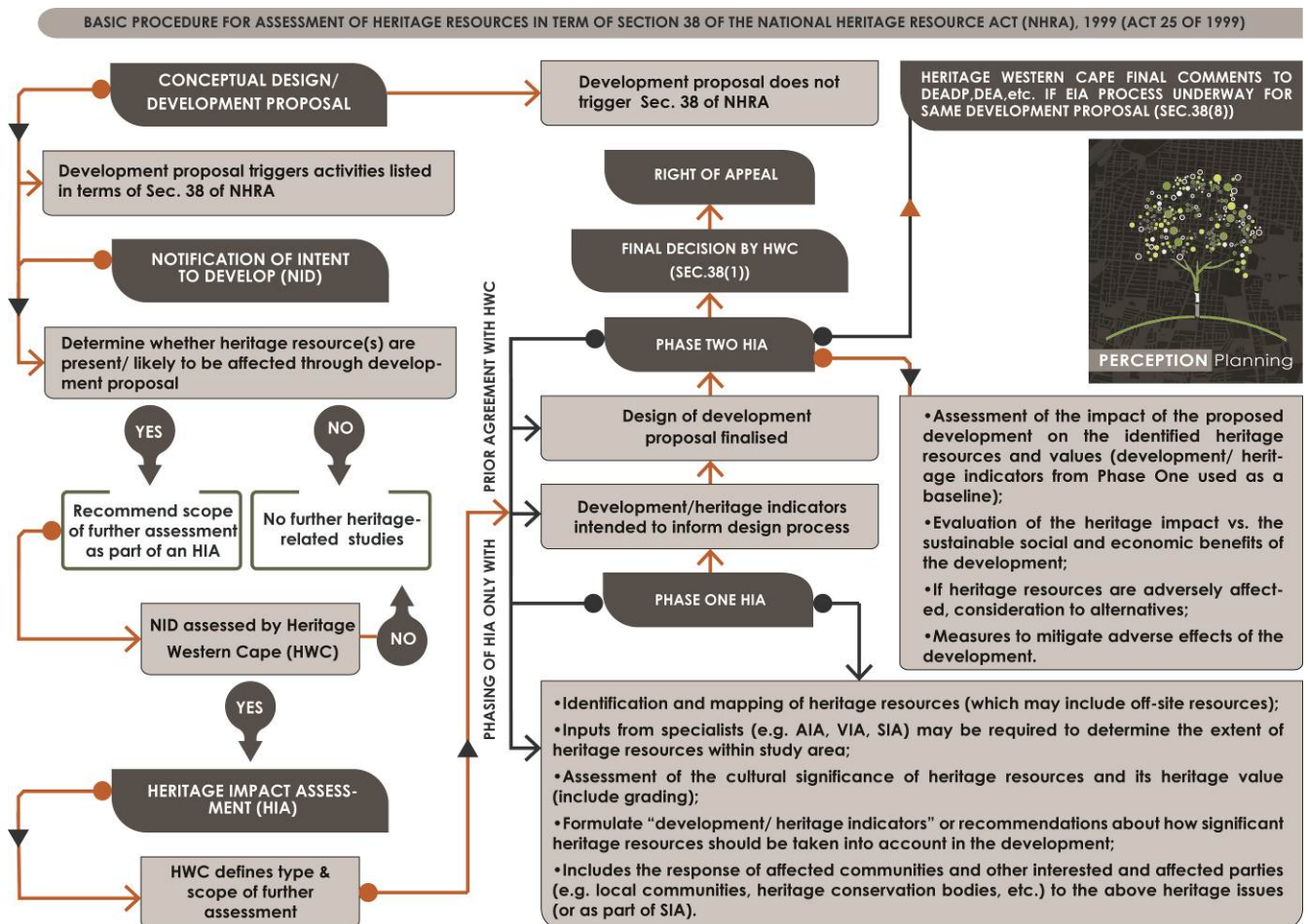
**Table 1:** Summary of grading and possible mgmt. strategies for Grade II and III heritage resources (Source: HWC, 2016)

**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 **Integrated HIA** included, *inter alia*, the following:

- Liaise with project team including the landowner, environmental assessment practitioner (CapeEAPrac), town planner (Marike Vreken Urban & Environmental Planners) and the local planning authority (Bitou Municipality);
- Field work undertaken by the author on 13<sup>th</sup> September 2022 and subsequently the archaeologist (Dr. Lita Webley) on 10<sup>th</sup> October 2022;
- Undertake basic historic background research;



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

- Assimilate findings from heritage-related research as well as independent specialist input: Archaeological Impact Assessment (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.

#### 4. PROPOSED DEVELOPMENT

According to the planning report (Marika Vreken Urban & Environmental Planners, 2022) the following three alternative development proposals for the property were investigated:

**Alternative 1 (Preferred)** – Development of a group housing development and would entail rezoning the property from Agricultural Zone I to Residential Zone II (3.17ha, western portion) and Open Space Zone III (5.41ha, eastern portion), respectively to accommodate the following components:

- **This alternative layout was amended to make provision for a 5m buffer around stone features noted during archaeological fieldwork along the northern property boundary (refer to Section 6.2 of this report);**
- 17 Group housing units (single storey, ±700m<sup>2</sup> coverage each);
- Entrance gate, guard house;
- Maintenance and staff room;
- Clubhouse, gym, conference room,
- Doctor/ nurse office and administrative office;
- The portion zoned as 'Open Space Zone III' will be used for a private 'nature reserve' – no development is proposed in the 'Open Space Zone III' portion.

"The 'Residential Zone II' portion is specifically located on the flat portion of the site, ensuring that the proposed units do not encroach onto the steep slopes. A biodiversity sensitivity map was compiled to determine the environmental sensitive areas of the site; to inform the layout of the units, which is specifically placed to not encroach onto the identified sensitive areas. The contour plan and biodiversity sensitivity map were used to determine the split-zoning line, to ensure that the proposed group housing units are all placed on 'Residential Zone II' portion. It also ensures that all the highly sensitive areas are protected in the 'Open Space Zone III' portion, which allows for a private nature reserve".

**Alternative 2** – Development of a group housing development. Alternative 2 have a different layout of units, that also consists of (17x) sectional title group housing units, a club house with communal recreational facilities and a private nature reserve.

This alternative would also comprise 17 sectional title group housing units, a club house, communal facilities, and a private nature reserve. It differs from the Alternative 1 layout in that some of the units encroach into the sensitive areas identified as part of the biodiversity sensitivity mapping. This alternative is therefore not considered desirable.

**No Go Alternative** – This alternative would maintain the status quo. "The no-go alternative is not desirable, as it means that a very strategic, centrally located piece of land in Plettenberg Bay will stay vacant, and undeveloped. The implication being that there will be more pressure for urban sprawl on other land parcels.

Site development plans for the revised Alternative 1 (Preferred Alternative) as well as Alternative 2 are attached as part of **Annexure 4** to this report.

#### 5. SPATIAL PLANNING CONTEXT

##### 5.1 Bitou Spatial Development Framework, 2017

According to this spatial planning framework only the westernmost portion of the property is located within the urban edge and designated as "existing urban development" whereas the eastern portion of the site is located outside the urban edge and designated as being part of "river corridor, wetland" (**Figure 6**). The exact alignment of the urban edge is assumed to align with the steep slope directly east of the existing main dwelling on the subject property. The SDF furthermore recommends (2017:294):

- "The estuarine and coastal set back line has been based on the Coastal Management Guidelines stating that these should be 100 metres back from the high-water mark (HWM) in urban areas and 1000 metres back in rural areas (EDM CMP, 2012);
- In order to retain the scenic Garden Route character and minimize flood risks there should be no further urban development westwards of Plettenberg bay except for the land between Turtle Creek and Goose Valley estates, other than that recommended in the Rural Land Use Planning and Management

Guidelines (PGWC, 2009) namely that Holiday Accommodation, Low Density Rural Housing (only permitted in Core 2 areas, and Low Impact Tourist and Recreational Facilities can be considered on a restricted basis, see Tables 2 and 3 and Annexure 1 of the Bitou SDF, 2017 document; and,

- Buildings should preferably be located in existing buildings or on disturbed footprints."



**Figure 6:** Subject property shown within context of spatial planning proposals for Goose Valley area as reflected in the Bitou Spatial Development Framework (2017)

**5.2 Draft Bitou Spatial Development Framework, 2020**

Spatial planning proposals contained in this draft document (**Figure 7**) includes designating the entire property for "urban development" and as being inside the urban edge. The draft SDF states that, "The nature of future development in the Goose Valley area around route N2 and westwards need to be clarified as some development pressure exist in the area." (2019:81) It furthermore recommends:

"In order to retain the scenic Garden Route character and to fit in with the existing character of the surrounds it is recommended that future development around route N2 be limited to Holiday Accommodation, Low Impact Tourist and Recreational Facilities and Low-Density Housing which should be considered on a restricted basis and subject to road access management standards/ requirements along route N2." (2019:112,113)



**Figure 7:** Subject property shown within context of draft spatial planning proposals for Goose Valley area as reflected in the Bitou Draft Spatial Development Framework (2020).

The proposal is therefore likely consistent with the spatial planning policies and objectives contained in the Draft Bitou SDF, 2020, as relevant to the study area.

## 6. HERITAGE RESOURCES AND ISSUES

This section of the report adherences to HWC's interim comments dated 4<sup>th</sup> November 2022 whilst adhering to the requirements specified in terms of Section 38(3) of the NHRA.

### 6.1 Historic Background

Basic historic background research focussed on primary and secondary sources obtained through the Deeds Office, Surveyor General's Office, and relevant secondary sources.

#### 6.1.1 Early regional economic context

From colonial perspective, economic development of the region east of the Hottentots-Holland Mountains (at that time the districts of Graaff-Reinet and Swellendam) could at first not feasibly be explored due to the lack of local markets and the distance to Cape Town. To solve the problem the Dutch East India Company established harbour facilities at Mossel Bay in 1786 and two years later at Plettenberg Bay. This, however, did little if anything for the economic development of the southern Cape, mainly because residents were indifferent and not prepared to shoulder the costs involved in coastal shipping.

After 1795 a few individuals, in partnership with the British authorities, took the initiative in promoting coastal shipping between Cape Town and the east coast, thereby linking the inhabitants and resources of that region to the Cape market. This reduced transport costs considerably, while also increasing the margins of profit (Muller, 1985).

#### 6.1.2 Town of Plettenberg Bay

The history of Plettenberg Bay therefore dates back to the 15<sup>th</sup> century when early Portuguese explorers travelled and called along what is now the South African coastline. Bartholomew Dias is recorded to have landed here in 1488, referring to the lagoons at the confluence of the Keurbooms and Bitou rivers as "Baia das Algoas" (Bay of the Lagoons). About 90 years later in 1576, Manuel da Mesquita da Perestrello renamed the bay "Baia Formosa" (Bay Beautiful) (Storror, 1988:38). During August 1630 the Portuguese ship *San Gonzales* was wrecked in the bay during a south-westerly gale. Records show that all 133 sailors on board perished but that 100 sailors, who had already made land, initially settled in the bay though eventually succeeding to return to Portugal (Storror, 1982).

In 1778 the then Governor of the Cape, Baron Joachim van Plettenberg visited the bay and renamed it after himself. As alluded to above, during 1786 it was decided to use the bay as a harbour for the shipping of timber. A local forester (Johann Friedrich Meeding) and another resident (Jan Jacob Jerling) were commissioned to construct a timber store in 1787. Being of enormous size but structurally unsound the building was replaced by a smaller during 1803 (Fransen, 2002:521). The walls of the early store remain (now a PHS) and is situated within present day Meeding Street, ±3.55km south of the subject property.

#### 6.1.3 Keurbooms/ Bitou river estuary

Findings emanating from research undertaken by the CSIR (1985) and Schumann (2019) describe how weather patterns (including flood events) and ecological processes have influenced sediment dynamics in and around the estuary. The impacts of human intervention and urban development can of course not be discounted. In a research paper interrogating historic change within the Keurbooms Estuary, Schumann (2019) uses early panoramic views (e.g. R J Gordon, 1778), early mapping as well as aerial imagery to analyse natural migration of the estuary mouth since the 18<sup>th</sup> century:

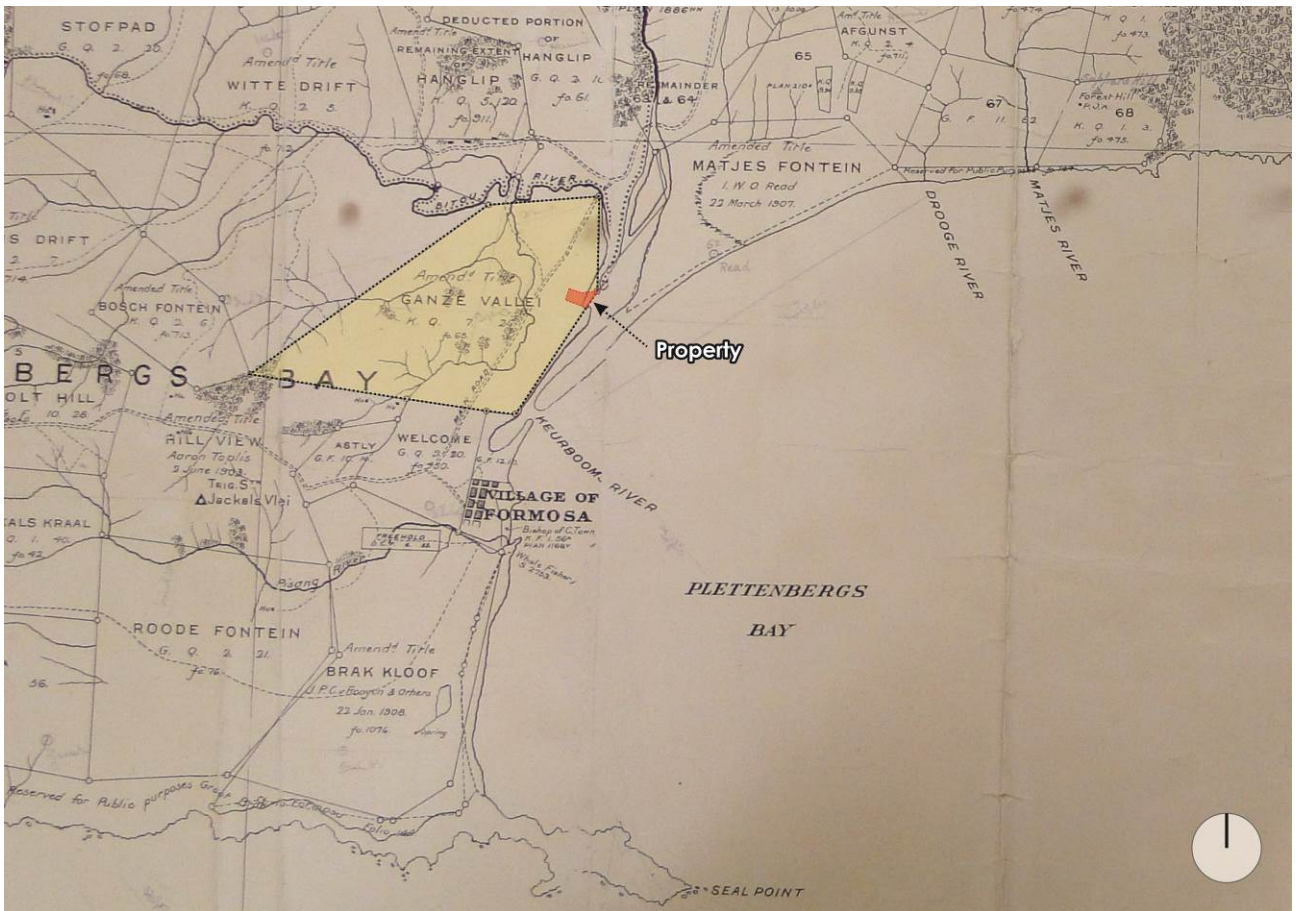
*"Storror (1978) shows maps drawn at about the same time by JC Frederici in 1789 and Lieutenant W McPherson Rice in 1797 which both depict the mouth of the Keurbooms positioned in the middle of the barrier dune, possibly more on the north-eastern side. A later map of the region drawn by the Royal Navy Hydrographic Office in 1867 shows the Keurbooms Estuary mouth situated at the Lookout Rocks. A Divisional Map of Knysna dated 1890 confirms this mouth position, and also shows a creek from the NW discharging into the estuary near its mouth, while the Bitou River was also flowing straight into the Keurbooms Estuary opposite Stanley's Island.*

*A map from the Colonial Surveyor-General in 1900 is shown in [Figure 8]. At this stage the Bitou Estuary was again in its present position west of the peninsula, while the mouth of the Keurbooms Estuary is depicted nearly 1km north of the Lookout Rocks."*

Given the location of the subject property in relation to the estuary and at the confluence of the Keurbooms and Bitou rivers, it is reasonable to deduce that soil conditions as well as landscape characteristics on and around the property would have been shaped over an extended period of time through these ecological processes.

**6.1.4 Ganse Vallei 444/38**

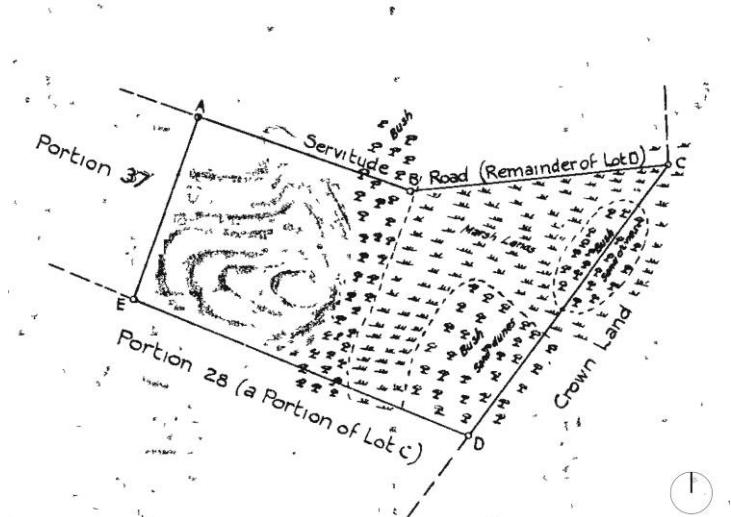
The subject property forms part of the original loan farm “Ganse Valley”, granted to Rynier van Rooyen which comprised an area of 842 Morgen (approximately 721.34 ha) and was first surveyed during 1818<sup>2</sup>. The 1818 diagram denotes historic land use north of the current N2 National Road as “grazing purposes” and highlights the location of a single structure – set back from the coast and some distance southwest of the subject property.



**Figure 8:** Location of the property within context of early mapping for the area (George Museum Archives, as edited)

Subsequent (1880-1900) SG Mapping of the area shows the early loan farm in relation to the village Formosa, bound by the Keurbooms River to the east and Bitou River to the north (Figure 8).

During 1894, the farm then referred to as “Ganse Vallei”, was subdivided into a number of smaller lots and a remainder<sup>3</sup>. Portion 38 of the farm was subdivided and framed during 1948. The diagram does not show any structures, roads, or footpaths on or within the direct proximity of the property, but vegetation growth is described in substantial detail (Figure 9).



**Figure 9:** Extract from 1948 SG Diagram describing vegetation cover as “bush” (likely indigenous coastal shrub) along steep slopes and “marsh, dunes and further bush” on lower-lying eastern portion (SGO, as edited).

Basic historical background research did not identify or highlight significant heritage-related themes pertinent to this particular portion of land. Note that a detailed deed search was not undertaken as part of this HIA. 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.

<sup>2</sup> S.G. Diagram 20/1818  
<sup>3</sup> SG Diagram 1055/1894

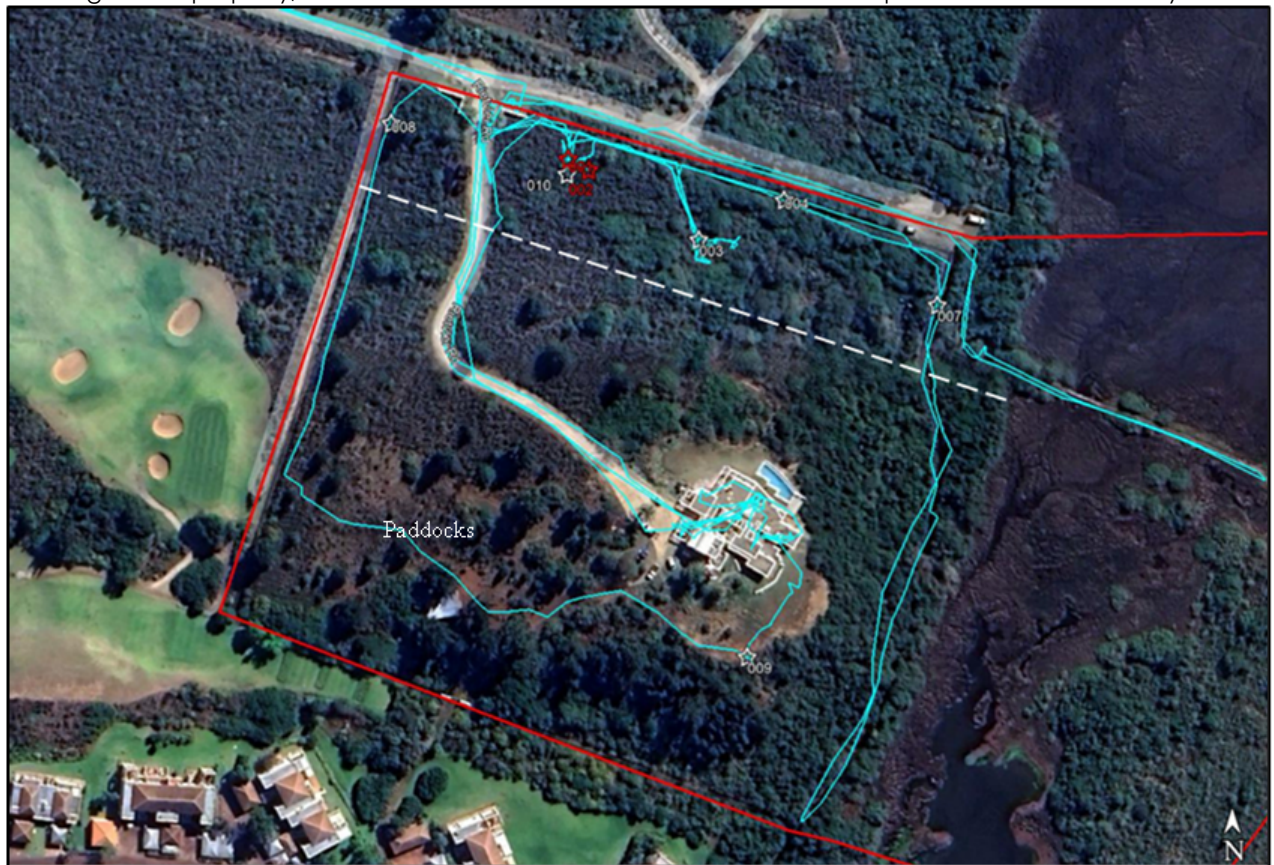
## 6.2 Archaeology

An archaeological impact assessment (AIA), undertaken by Dr Lita Webley, included a literature review and archaeological foot survey on 27 June 2022. Key findings emanating from the AIA are transposed below and the full AIA report is attached to the HIA as **Annexure 5**.

The literature survey of the general area observes that there may be ESA and MSA artefacts made on the quartzite beach/river cobbles (which are common in the area), but they are considered to be low in density, possibly in secondary context, and of Low significance.

The field survey of the 10<sup>th</sup> October 2022, confirmed a field survey undertaken by Nilssen in 2009. There is no evidence of pre-colonial or colonial/historical period archaeology on the site. However, it is important to note that dense coastal vegetation impacted a comprehensive survey.

The two small stone features, located on the northern edge of the site, were relocated, and assessed. Nilssen (2009) had suggested that they might be graves of pets or the “burials of small children”. There is no obvious indication that they represent grave markers. They may equally result from the construction of the main dwelling on the property, excavations for services or relate to an earlier footpath down to the estuary.



**Figure 10:** Google Earth (2022) aerial image showing survey walk tracks (blue lines) (Webley, 2022)

## 6.3 Palaeontology

A Desktop PIA compiled by Dr. John Pether in relation to an earlier (2009) proposal to develop the property as part of a boutique hotel, concluded as outlined below. The complete report is attached as **Annexure 6**.

*“The Keurbooms estuary and its barrier-beach and tidal-inlet system is one of the most studied of such systems on the South Africa coast. The historical changes to the system during the last ~100 years are approximately known, but its earlier history, preserved in the deposits around the margins, is not well studied. The proposed hotel site is situated on the eastern, younger, seaward part of late Quaternary, conglomeratic “beach terrace” deposits marginal to the Keurbooms estuary. Although the fossil potential is moderate in beach conglomerates, layers and pockets of fossil shell may occur and have previously been noted in the general area. Full time archaeological monitoring of bulk earthmoving activities by a suitably qualified professional was recommended in the AIA. It is recommended that said archaeological monitor also watch for the occurrence of fossils and liaise with the appointed palaeontologist on any occurrences and the nature of the deposits (e.g. preservation of carbonate “shell sand” and possible interbedded estuarine muds). Should fossils finds or geologically significant sections be exposed, the primary mitigation task entails the specialist documentation and sampling of the excavations. The significance of such samples/documentation involves:*

- *Significance in the history of sea-level change and coastal evolution.*
- *Record of changes in faunal communities with time.*

- For future radiometric and chemical dating purposes (rates of coastal change).
- Preservation of fossils for future palaeoenvironmental research e.g. stable-isotope palaeo-temperature analysis, palaeo-salinity etc.
- Preservation for the application of yet unforeseen investigative techniques."

#### 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 value"*<sup>4</sup>

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.



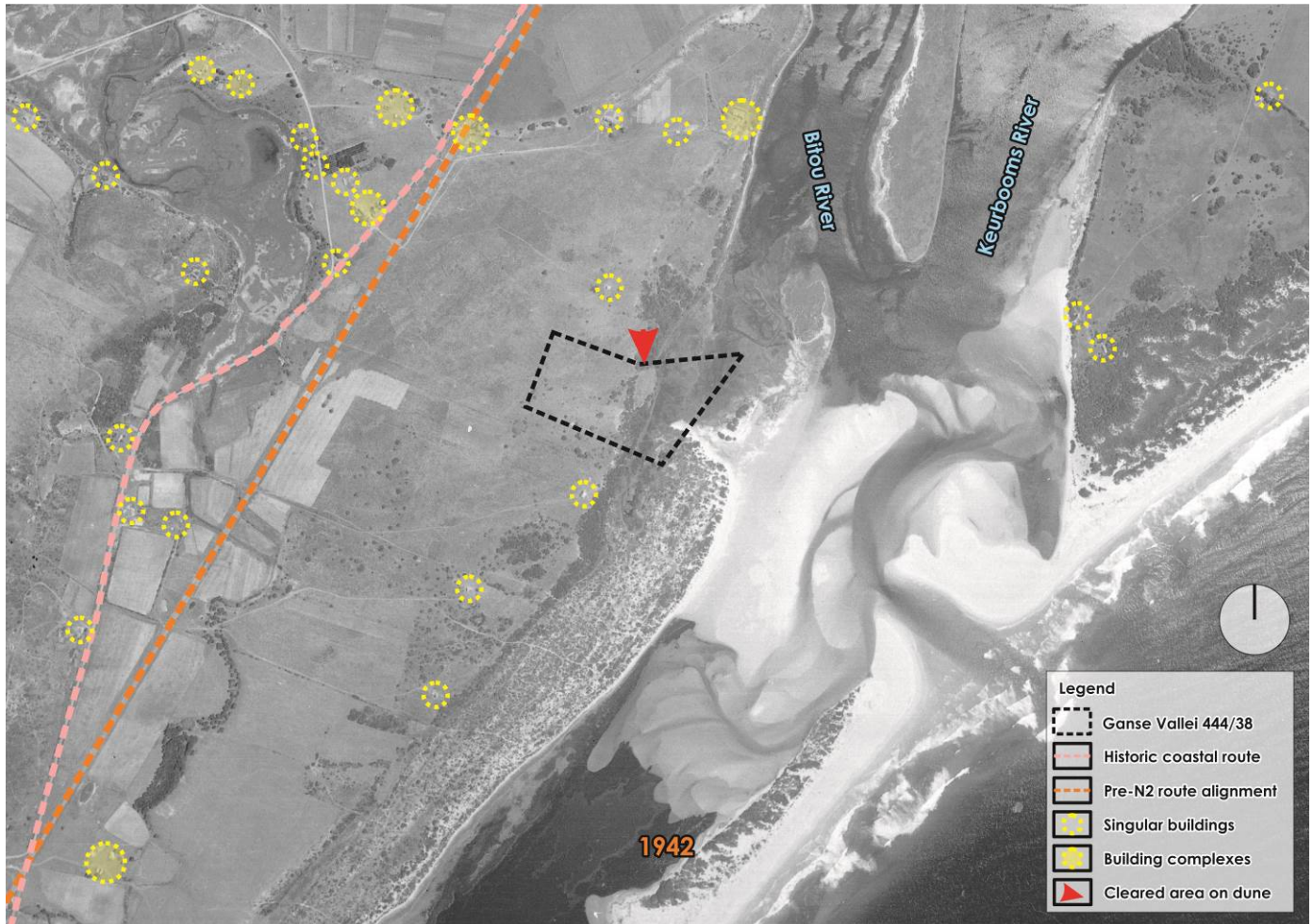
**Figure 11:** Ganse Vallei 444/38 within context of 1936 aerial imagery for the area (Flight Survey 114, Flight Strip 14, Image 19253, NGSi as edited)

<sup>4</sup> Baumann & Winter Heritage Consultants (2004)

Analysis of earliest available (1936 & 1942) high resolution aerial photography was found useful to inform our understanding of the study area from a cultural landscape perspective. While both images are included below the higher overall quality of the 1942 image allowed for more comprehensive analysis. From said analysis the following traditional (i.e. Pre-Modern) cultural landscape patterns emerge, as summarized below:

Aerial survey 114 of 1936 (Figure 11):

- This image provides the earliest available snapshot of the broader coastal landscape together with the early coastal route.
- Comparing this image to 1942 and subsequent aerial imagery serves as a reminder of the complexity of ecological processes that constantly influence sediment dynamics in and around the estuary.



**Figure 12:** Ganse Vallei 444/38 within context of 1942 aerial imagery for the area (Flight Survey 6, Flight Strip 038, Image 11526, NGSI as edited)

Aerial survey 6 of 1942 (Figure 12):

- Location of the subject property at the confluence of the Bitou and Keurbooms rivers.
- The image predates construction of the current N2 National Road but shows the alignment of the early coastal road (pink) in relation to that of the latter route (orange), preceding the current N2 alignment, in connecting Plettenberg Bay with the Tsitsikamma region and Eastern Cape further north.
- By this time much of the landscape (save for a narrow coastal strip defined by the estuary and primary dune system) had been transformed through agricultural activities. The landscape is seen interspersed by a patchwork of cultivated fields – particularly so along movement routes.
- Early structures are noted across the landscape, most of which appear as singular buildings. A number of building complexes, consisting of several buildings are highlighted separately.
- A network of narrow tracks/ footpaths traverses the landscape – several of these are seen crossing primary dunes to access the estuary/ beach.
- One of these tracks follow the western bank of the Bitou River, passes a farm complex and traverses the subject property.
- Much of the surface area of the property had been transformed through human intervention by this time. A portion of the dune upon which the current residential dwelling sits had been cleared of vegetation. No structures are noted on the property.

As discussed, there is a public access point and small parking area at the very eastern end of Rietvlei Road is located along the northern property boundary. From here a public footpath leading to the estuary traverses

the eastern portion of the property (Figure 3). While the principle of maintaining some form of public access to the estuary is supported through analysis of cultural landscape patterns, the exact location of these do not correlate with historic routes evident from early aerial imagery. It is envisaged that the location and alignment of this access would be interrogated in terms of e.g. ecological impact through the environmental process.

## 7. SIGNIFICANCE AND GRADING

### 7.1 Archaeology

The findings and recommendations are outlined in the attached archaeological impact assessment undertaken by Dr. Lita Webley. Briefly, there is no evidence of any pre-colonial or colonial period archaeology on the property. There is a slight possibility of archaeological material under the dune which covers the southern portion of the property, but this will only be exposed during sub-surface construction work.

The two small stone features, initially identified by Nilssen in 2009, were overgrown with indigenous bush. They consist of quartzite cobbles, are small in size and located some 4m apart. If the stone features do represent burial markers, then they would be graded as IIIA. This cannot be verified from a visual inspection.

### 7.2 Palaeontology

According to SAHRIS Paleo-sensitivity mapping, the study area is not highlighted meaning that the palaeontological sensitivity is unknown and that "a minimum of a desktop PIA is required<sup>5</sup>. Recommendations contained in the 2009 Desktop PIA by Dr. John Pether include the following:

*"It is not possible to predict the buried fossil content of an area other than in general terms. Fossils bones are sparsely scattered in coastal deposits and much depends on spotting them as they are uncovered during digging i.e. by monitoring excavations. In contrast, shelly layers are usually fairly extensive and normally are exposed in the sides of the finished excavation, when they can be documented and sampled easily during primary fieldwork.*

*For the future developments, it is suggested that an acceptable degree of mitigation, entailing both monitoring and a detailed inspection of excavations (primary fieldwork), be carried out. The monitoring of excavations whilst they are being made is aimed mainly at recovering the sporadic, but important fossils. The primary fieldwork is to document the exposures and establish their stratigraphic and palaeoenvironmental contexts, with sampling of fossiliferous beds. A management framework for the mitigation process is proposed."*

### 7.3 Cultural landscape context

The area within the proximity of the property has been subject to extensive urban development and little if any of the traditional landscape patterns remain evident today. The principle of maintaining some form of public (pedestrian) access to the estuary is considered reasonable.

The property is presently bound by the Goose Valley golf/ residential estate to the east and southeast, the more compact Quartet retirement estate to the northwest and the low-density Meadows Country Estate to the north. During recent years, a commercial/ industrial node has become established at the N2/ Rietvlei Road intersection, ±538m northwest of the property.

## 8. ASSESSMENT OF IMPACTS

### 8.1 Archaeology

No precolonial or historical remains were found and impacts to sub-surface archaeological remains are considered to be Low.

If the two stone features first identified by Nilssen (2009) and then assessed by Webley in 2022, represent graves, then they would be negatively impacted by construction activities on the site during the development of the residential units. However, there is also a possibility that the two stone features are not burial markers but the result of other construction or landscaping actions on the property during the recent past. If the stone features are avoided during development, then impacts would be Low.

Potential impacts on archaeological resources	
Nature and status of impact	Direct, negative
Extent and duration of impact	Local, permanent
Intensity	Low
Probability of occurrence	Low
Degree to which the impact can be reversed	Low

<sup>5</sup> <https://sahris.sahra.org.za/map/palaeo>, accessed 18<sup>th</sup> January 2023



Degree to which the impact may cause irreplaceable loss of resources	High
Cumulative impact prior to mitigation	Unknown
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, Very-High)	Unknown
Proposed Mitigation	Implement a 5 m buffer around the two features.
Cumulative impact post mitigation	N/A
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, Very-High)	N/A

**Table 2:** Summary – assessment of anticipated impacts on archaeological resources (Webley 2022:20)

### 8.1.1 **Recommendations: Archaeology**

It is recommended that development proposals are endorsed subject to the following recommendations:

- Alternative 1, the preferred alternative, is supported.
- A buffer of 5 m must be implemented around the two stone features. They must be fenced during the earth moving activities, to protect them from accidental impact.
- An archaeologist must be on site to monitor earth moving activities, particularly those areas around the stone features.
- In view of the possibility of fossil shells (Desktop PIA 2009), the Fossil Finds Protocol must be included in the EMPr.

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**

As discussed above, a Desktop PIA compiled by Dr John Pether was submitted to the APM Committee of HWC on 2<sup>nd</sup> June 2009 (Case No 37/ROD ID 418) and it was agreed that:

- Archaeological monitoring of bulk earthmoving activities must take place.
- The Archaeologist must report any occurrences of fossils and a Palaeontologist must record the exposed sections before the trenches are closed up.

### 8.3 **Cultural landscape**

Given the pattern of urban development within the proximity of the property, its location within the urban edge and having been earmarked for "urban development" in the Draft Bitou SDF (2020), it is our contention 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 low local (site-specific) cultural significance.

### 8.4 **Cumulative impacts**

There have been few, if any reports of significant archaeological heritage resources along this section of the coastline between Plettenberg Bay and Keurboomstrand. This could be partly due to the changes in the Keurbooms River estuary as well as previous raised beaches. The cumulative impact of the proposed development is considered to be Low.

### 8.5 **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 proposal is likely to create limited temporary and possibly some permanent employment opportunities 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 property or its direct proximity.

## 9. **PUBLIC PARTICIPATION PROCESS**

The public participation process was conducted in accordance with requirements outlined in the HWC Public Consultation Guidelines, June 2019. The study area is situated within the jurisdiction of Bitou Municipality and within an area covered by a single local conservation body 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 extended over a period of at least 30 calendar days (9<sup>th</sup> February 2023 – 13<sup>th</sup> March 2023) and incorporated the following components:

- Formal notice published in local press (Knysna Plett Herald)
- Draft HIA and Annexures circulated to the local planning authority (Bitou Municipality);

- Draft HIA and Annexures circulated to the local conservation body;
- A3 laminated public notice installed on the site for the duration of the consultation period.

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

Organisation / Department	Contact Person	E-mail
Bitou Municipality (Planning & Building Control)	Mr. Marius Buskes	<a href="mailto:mbuskes@plett.gov.za">mbuskes@plett.gov.za</a>
Simon v/d Stel Foundation (Southern Cape)	Dr. Natie de Swardt	<a href="mailto:natiedes@gmail.com">natiedes@gmail.com</a>

With the exception of a confirmation of receipt from Bitou Municipality dated 9<sup>th</sup> February 2023 we received no enquiries or comments up to the date of this report. Proof of public consultation is attached as part of **Annexure 7** to this report.

## 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	It is recommended that development proposals are endorsed subject to the following recommendations: <ul style="list-style-type: none"> <li>• Alternative 1, the preferred alternative, is supported.</li> <li>• A buffer of 5 m must be implemented around the two stone features. They must be fenced during the earth moving activities, to protect them from accidental impact.</li> <li>• An archaeologist must be on site to monitor earth moving activities, particularly those areas around the stone features.</li> </ul>
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	As per the APM Committee decision dated 2 <sup>nd</sup> June 2009 (Case No 37/ROD ID 418): <ul style="list-style-type: none"> <li>• Archaeological monitoring of bulk earthmoving activities must take place.</li> <li>• The Archaeologist must report any occurrences of fossils and a Palaeontologist must record the exposed sections before the trenches are closed up.</li> </ul>
10.4	The HWC Chance Fossil Finds Protocol to be implemented and included in the Environmental Management Programme Report.
10.5	Provision of adequate public (pedestrian) access to the estuary should be addressed in the environmental process.

**PERCEPTION Planning**

**17<sup>th</sup> March 2023**



**SE DE KOCK**

Hons (TRP) EIA Mgmt (IRL) PrPln 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 John Pether holds a PhD in Palaeontology and is an independent Consultant/Researcher recognized as an authority with 37 years' experience in the field of coastal-plain and continental-shelf palaeoenvironments, fossils and stratigraphy, mainly involving the West Coast/Shelf of southern Africa. He is a member of the South African Council of Natural Scientific Professions. Earth Science (Reg. No. 400094/95), Geological Society of South Africa, Palaeontological Society of Southern Africa, Southern African Society for Quaternary Research and Association of Professional Heritage Practitioners (APHP), Western Cape. Accredited (Member No. 48).

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

**REFERENCES and ACKNOWLEDGEMENTS**

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9. Kathleen Schulz, Southern Cape Historian
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12. Nilssen, Peter (2009). Archaeological Impact Assessment: Proposed Construction of a Hotel on Gansevallei 444/38 (Plettenberg Bay), District Knysna, Western Cape Province.
13. Pether, John (2009). Palaeontological Impact Assessment (Desktop Scoping Study): Proposed Construction of a Hotel on Ganse Vallei 444/38, Plettenberg Bay, District Knysna, Western Cape.
14. Schumann, E. (2019). *The Keurbooms Estuary: A History of Change* (Research Paper). Institute for Coastal and Marine Research, Nelson Mandela University.
15. Storrar, P (1982). *Portrait of Plettenberg Bay*. 2<sup>nd</sup> Edition. Centuar Publishers, Cape Town.
16. Storrar, P (1988). *Drama at Ponta Delgada – Shipwreck at Plettenberg Bay*. Lowry Publishers, Johannesburg.
17. Surveyor General Office
18. Webley, L (2022). Archaeological Impact Assessment: Proposed Urban Development on Erf 3991, Hartenbos, Mossel Bay Municipality, Western Cape Province.

**POWER OF ATTORNEY**

I, **NILS BRINK VAN ZYL (SA ID 5205235096088)**, being the Proxy/ Representative of **TRUE MOTIVES 99 (PTY) LTD** (being the Registered Owner of the farm **GANSE VALLEI 444/38 (PLETTENBERG BAY), KNYSNA DISTRICT AND MUNICIPALITY**, hereby nominate Stéfán de Kock of *PERCEPTION Planning*, with power of substitution, to be my agent in name, place and stead, (as set out in their quotation dated 16<sup>th</sup> November 2022) to sign on my behalf and submit to the appropriate authorities the following application, which mandate shall, without limiting the generality of the a foregoing, include:


- a.) Compilation and management of Integrated Heritage Impact Assessment process with relation to development of the above property, as required in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act 25 of 1999).

I hereby accept the Terms of Agreement as set out in abovementioned quotation dated 16<sup>th</sup> November 2022.

Signed at Sandton on 18 January 2023.

  
\_\_\_\_\_  
Proxy Representative

  
\_\_\_\_\_  
Witness

  
\_\_\_\_\_  
Witness

Prepared by me,

Conveyancer  
ARTLETT D P

17

SEELREG DUTY	R.....
FOOI FEE	R. 500,00

T 020048 / 2002

# DEED OF TRANSFER

BY VIRTUE OF A POWER OF ATTORNEY

KNOW ALL MEN WHOM IT MAY CONCERN

THAT **ELMA HAMMAN**

8/4  
hetesha

REGISTERED

VERIFIED

appeared before me, Registrar of Deeds at **CAPE TOWN** he being duly authorised thereto by a Power of Attorney, executed at **PLETTENBERG BAY** on the **5** day of **MARCH 2002**, by

**ABRAHAM JOHANNES VAN ALMËNKERK**

Identity No. **540413 5229 18 4**

Married, which marriage is governed by the **Laws of the Netherlands**

Assisted by his spouse as far as needs be **LIES MARIE COULIER-VAN ALMËNKERK**

which power, witnessed in accordance with law, was exhibited to me on this day.

*[Handwritten signature]*

And the Appearer declared that his said Principal had truly and legally sold on the 8 FEBRUARY 2002 and that he in his capacity as Attorney aforesaid did by these presents, cede and transfer, in full and free property to and on behalf of


**TRUE MOTIVES 99 (PROPRIETARY) LIMITED  
NO. 2001/028673/07**

or Its Assigns

**PORTION 38 (A PORTION OF PORTION 4) OF THE FARM  
GANSE VALLEI NO. 444, IN THE PLETTENBERG BAY MUNICIPALITY,  
DIVISION OF KNYSNA, WESTERN CAPE PROVINCE;**

**IN EXTENT: 8,5805 (EIGHT comma FIVE EIGHT NOUGHT FIVE)  
SQUARE METRES;**

**FIRST TRANSFERRED BY DEED OF TRANSFER NO. T.49781/1980 WITH  
DIAGRAM NO. 6687/48 RELATING THERETO AND HELD BY DEED OF  
TRANSFER NO. T.22678/2001**

- A. SUBJECT** to the conditions referred to in Deeds of Transfer Nos. 11190/1929 and 11191/1929.
- B. ENTITLED** to the benefit of the condition referred to in the Endorsement dated 29 May 1940 on Deed of Transfer No. 11190 dated 8 November 1929 and Deed of Transfer No. 10976 dated 5 October 1939 which Endorsement reads as follows :
- "By Transfer No. 5141 dated 29.5.1940 the 5,67 metres roadway indicated on the Diagram No. 5744/1939 thereto annexed shall be for the joint use of the owners & successors in title of Lot No. 2 thereby conveyed by para. 1 and remainder of Lot D held hereunder, as will more fully appear on reference to said Deed of Transfer"
- C. SUBJECT and ENTITLED** as the case may be, to the conditions referred to in the Endorsement dated 20 November 1944 on Deeds of Transfer Nos. 11190/1929 dated 8 November 1929 and 10976/1939 dated 5 October 1939, which Endorsement reads as follows :
- 

"By Trf. 16366 gedateer 20.11.1944 certain conditions regarding (a) Fencing (b) a right to demand a right of way over the remainder held hereunder have been agreed upon and (c) a right of way 9,45 metres wide over the land thereby transferred has been granted in favour of the remainder held hereunder as will more fully appear on reference to the said Deed of Transfer."

- D. SUBJECT** to the servitude referred to in the Endorsement dated 20 april 1955 on Deed of Transfer No. 26243/1948 dated 18 November 1948, which Endorsement reads as follows :

#### REGISTRASIE VAN SERWITUUT

Die binnegemelde eiendom is onderhewig aan 'n serwituut in terme van 'n Bevel van die Water Hof (Water Hof Distrik No. 4) gedateer 13-12-1954 soos breedvoerig sal blyk uit die gesegde Bevel waarvan 'n kopie hieraan geheg is, No. 177/55."

(a copy of the Order of Court is annexed to Deed of Transfer No. T.49781/1980 marked Annexure "A")

- E. ENTITLED** to the conditions referred to in the Endorsement dated 27 September 1968 on Deed of Transfer No. 26243 dated 18 November 1948, which Endorsement reads as follows:

#### REMAINDER

By Deed of Transfer No. 21776/1968 dated 27 September 1963 the remainder of Lot D part of the farm Ganse Valley, measuring: 32,9529 hectares held hereunder is entitled to the benefit of the following conditions: (a) The property shall be used for residential, business and recreational purposes only and no factory, motor scrap yard or any noxious trade or industry shall be conducted or opened on the said property unless the consent in writing of the transferor and his successors in title has first been obtained. (b) No sand pits or other excavation shall be made on the property without the written consent of the Transferor or his aforesaid first having been obtained, nor shall there be erected on the said property any unsightly structures or fences; over Portion 36 (a portion of Lot D) of the farm Ganse Vallei, measuring 4,2827 hectares transferred thereby. As will more fully appear on reference to said Deed of Transfer."





**WHEREFORE** the Appearer in his said Capacity, renouncing all the right and title the said TRANSFEROR

heretofore had to the premises, did, in consequence also acknowledge the said TRANSFEROR

as aforesaid to be entirely dispossessed of, and disentitled, to the same; and that by virtue of these presents the said

**TRANSFeree COMPANY**

or Its Assigns, now and henceforth shall be entitled thereto conformably to local custom; State, however, reserving its rights; and finally acknowledging the said TRANSFEROR

to have been satisfactorily paid or secured the whole of the purchase money amounting to the sum of R2 500 000,00 (TWO MILLION FIVE HUNDRED THOUSAND RAND)

**IN WITNESS** whereof, I, the said Registrar, together with the Appearer have subscribed to these presents and have caused the Seal of Office to be affixed thereto.

**THUS DONE AND EXECUTED**, at the office of the Registrar of Deeds, in CAPE TOWN

on the 18 day of March 2002

  
.....  
q.q.

In my presence,

  
**REGISTRAR OF DEEDS**



11

REPUBLIEK VAN SUID-AFRIKA  
 DEPARTEMENT VAN FINANSIES  
 BINNELANDSE INKOMSTE  
 HEREGTE - TRANSFER DUTY

REPUBLIC OF SOUTH AFRICA  
 DEPARTMENT OF FINANCE  
 INLAND REVENUE

DEEL 1/PART 1

21

TRANSPORTGEWER:  
 TRANSFEROR: ABRAHAM JOHANNES VAN ALMENKERK  
 Born on 13 April 1954  
 Married, which marriage is governed by the Laws of the Netherlands

TRANSPORTNEMER:  
 TRANSFEREE: TRUE MOTIVES 99 (PROPRIETARY) LIMITED  
 NO. 2001/02867/07

BESKRYWING VAN EIENDOM:  
 DESCRIPTION OF PROPERTY:  
 PORTION 38 (A PORTION OF PORTION 4) OF THE FARM GANSE VALLEI NO. 444,  
 IN THE PLETTENBERG BAY MUNICIPALITY, DIVISION OF KNYSNA,  
 WESTERN CAPE PROVINCE;  
 IN EXTENT: 8,5805 HECTARES;

RECEIVER OF REVENUE  
 SARS  
 2002-02-28  
 P. O. BOX 657  
 CAPE TOWN, 8000

Poskode van distrik waarin eiendom geleë is  
 Postal Code of district in which property is situated

Wyse van verkryging : TRANSFER  
 Mode of acquisition :

Datum van transaksie 8 February 2002  
 Date of transaction:  
 Vergoeding: R 2 500 000,00  
 Consideration:

1618

HEREGTE BETAAL DEUR BUCHANAN BOYES (DPA/NFelton)  
 TRANSFER DUTY PAID BY.....  
 Posadres: P O BOX 395, CAPE TOWN  
 Postal address:  
 Munisipale, Afdelingsraad- of ander plaaslike bestuurswaardering:  
 Municipal, Divisional Council or other local authority valuation: R.....

CH VIR AMPTELIKE GEBRUIK - FOR OFFICIAL USE

Hereregte betaal op 2 500 000 - 00  
 Transfer duty paid on R.....  
 Synde 2002-02-28 0000014717  
 Being (Transfer Duty) R 250,000.00

Wet waarkragtens hereregte gehef word 40/49  
 Act under which duty charged CHEQUE

Staa-rolleerstampel van kantoor van uitreiking  
 Steel defacing stamp of office of issue  
 1162 2002-02-28 162  
 REVENUE SERVICE

Ontvanger van Inkomste  
 ONTVANGER VAN INKOMSTE  
 RECEIVER OF REVENUE  
 KAAPSTAD/CAPETOWN

1618/8  
 27/2/02  
 KASREGISTERKWITANSIE/CASH REGISTER RECEIPT



21

Artikel 118 van Wet 32/200  
Section 118 of Act 32/2000

**MUNISIPALITEIT PLETTENBERGBAAI  
PLETTENBERG BAY MUNICIPALITY**

**MAGTIGING VIR REGISTRASIE VAN OORDRAG VAN ONROERENDE GOED  
AUTHORITY FOR REGISTRATION OF TRANSFER OF IMMOVABLE PROPERTY**

Ingevolge Artikel 118 van die Plaaslike Owerheids Stelsel Wet No 32 van 2000 word magtiging hierby verleen vir die registrasie van die oordrag van die volgende onroerende goed :

In accordance to Section 118 of the Local Government Municipal Act No 32 of 2000 authority for the registration of the transfer of the following immovable property is hereby granted:

**TITEL BESKRYWING  
TITLE DEED DESCRIPTION**

PN 38 (A PN OF PN 4) OF THE farm Gansse  
Vallei No 444

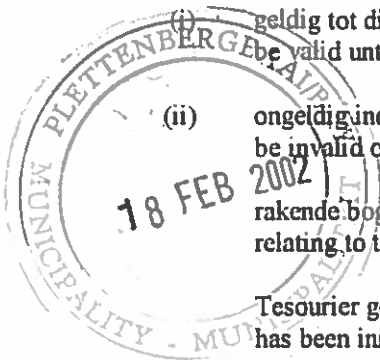
geleë in die area van die Plettenbergbaai Munisipaliteit , distrik Knysna in die Wes Kaap Provinsie.  
situated in the area of the Plettenberg Bay Municipality, Division of Knysna in the Western Cape Province.

Hierdie magtiging is -  
This authority shall -

(i) geldig tot die 30ste dag van Junie 2002  
be valid until the 30<sup>th</sup> day of June 2002

(ii) ongeldig indien enige wysiging van die datum in paragraaf (i) gemeld of van die besonderhede  
be invalid of any alteration of the date referred to in paragraph (i) or of the particulars  
rakende bogemelde onroerende goed aangebring is tensy elke sodanige wysiging deur die  
relating to the abovementioned immovable property has been made unless very such alteration

Tesourier geparafeer is.  
has been initialled by the Treasurer.



TESOURIER  
TREASURER

*Alger*

DATUM  
DATE

2002/2/18

SUB-DIVISIONAL DIAGRAM,  
Sect. 24 (b), Act No. 9 of 1927.

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6687/48

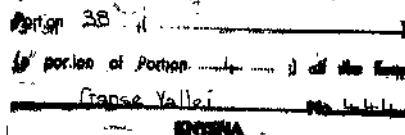
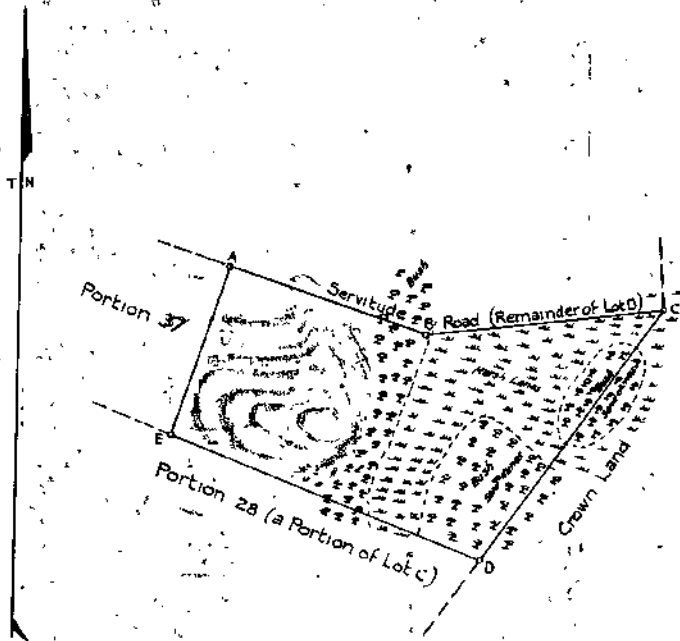
SIDES	Cape Feet	ANGLES OF DIRECTION	SYSTEM 12 23° CO-ORDINATES	
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Constants 0.00 11500000.00				
A-B	689.09	288° 1' 40"	A - 113557.34 +	61287.32
B-C	799.93	262° 36' 20"	B - 114212.62 +	61500.58
C-D	1037.29	84° 36' 20"	C - 115005.90 +	61997.63
D-E	1116.90	110° 47' 20"	D - 114416.80 +	62251.40
E-A	596.98	198° 1' 40"	E - 113372.62 +	61854.99

No.  
Approved

*J. Robinson*  
Surveyor-General.  
18 OCT 1948

DESCRIPTION OF BEACONS

- A B E..... 3' Angle Irons & Cairns
- C..... 3' Angle Iron alongside planted Stone
- D..... 14' x 8" planted stone under fence



Scale 1 : 5000

The figure A-B-C-D-E  
represents 10-0177 Morgen of land being

**METRIC AREA**  
**8.5805 HECTARES**

Portion 38 (a Portion of Lot D) of the farm.

GANSE VALLEY

situate in the Division of Knysna

Province of Cape of Good Hope.

Surveyed in May 1948 by me

*Allen Erand*  
Land Surveyor.

This diagram is annexed to  
D/T 49781/80

The original diagram is  
No. 2187/1937 annexed to  
Deed of Transfer 1899-15-1265

File No. 134 53  
S.R. No. E. 1588/48  
Dog Sheet AM-188 Knysna G.T. 26

Registrar of Deeds.



**Enquiries** Nicholas Wiltshire  
**Tel:** 021 483 9685  
**Email:** [nwiltshire@pgwc.gov.za](mailto:nwiltshire@pgwc.gov.za)

**Tracking:**  
**Unique RoD ID:** 275  
**Unique Case ID:** 37

01 April 2009  
Mr Stefan de Kock  
PO Box 9995  
George  
6530

**AIA: PROPOSED HOTEL ON PTN 38 OF GANSE VALLEI 444, PLETTENBERG BAY, EDEN**

The above matter was discussed at the Heritage Western Cape Archaeology, Palaeontology and Meteorites (APM) Permit Committee meeting held on 01/04/2009.

It was noted that:

1. Two stone cairns of possible burials were discovered
2. Archaeological visibility was low due to thick vegetation
3. Archaeological monitoring of bulk earthworks was recommended in the AIA
4. The Palaeontological scoping study had still not been done as per the February RoD from HWC

It was agreed that:

1. The recommendations in the AIA were accepted
2. The proposal was approved subject to the Palaeontological scoping study

Yours faithfully

Nicholas Wiltshire  
Senior Heritage Officer : Archaeology  
For: Accounting Authority: Heritage Resources Management Services.  
Pp Heritage Western Cape

1. This decision is subject to an appeal period of 14 working days.
2. The applicant is required to inform any party who has expressed a bona fide interest in any heritage related aspect of this record of decision. The appeal period shall be taken from the date of being informed. It should be noted that for an appeal to be deemed valid it must refer to the decision, it must be submitted by the due date and it must set out the grounds of the appeal. Appeals must be addressed to the official named above and it is the responsibility of the appellant to confirm that the appeal has been received within the appeal period.
3. This decision does not exonerate the applicant from obtaining local authority approval or any other approval for the proposed work.
4. If any heritage resources, including graves or human remains, are encountered they must be reported to Heritage Western Cape immediately.



**Enquiries** Nicholas Wiltshire  
**Tel:** 021 483 9685  
**Email:** [nwiltshire@pgwc.gov.za](mailto:nwiltshire@pgwc.gov.za)

**Tracking:**  
**Unique RoD ID:** 418  
**Unique Case ID:** 37

02 June 2009  
Mr Stefan de Kock  
PO Box 9995  
George  
6530

**DESKTOP PIA: PROPOSED HOTEL ON PTN 38 OF GANSE VALLEI 444, PLETTENBERG BAY, EDEN**

The above matter was discussed at the Heritage Western Cape Archaeology, Palaeontology and Meteorites (APM) Permit Committee meeting held on 02/06/2009.

It was noted that:

1. The development will affect Quaternary deposits in the Keurbooms estuary
2. Layers & pockets of fossil shell have been noted in the area

It was agreed that:

1. Archaeological monitoring of bulk earthmoving activities must take place
2. The Archaeologist must report any occurrences of fossils and a Palaeontologist must record the exposed sections before the trenches are closed up

Yours faithfully

Nicholas Wiltshire  
Senior Heritage Officer : Archaeology  
For: Accounting Authority: Heritage Resources Management Services.  
Pp Heritage Western Cape

1. This decision is subject to an appeal period of 14 working days.
2. The applicant is required to inform any party who has expressed a bona fide interest in any heritage related aspect of this record of decision. The appeal period shall be taken from the date of being informed. It should be noted that for an appeal to be deemed valid it must refer to the decision, it must be submitted by the due date and it must set out the grounds of the appeal. Appeals must be addressed to the official named above and it is the responsibility of the appellant to confirm that the appeal has been received within the appeal period.
3. This decision does not exonerate the applicant from obtaining local authority approval or any other approval for the proposed work.
4. If any heritage resources, including graves or human remains, are encountered they must be reported to Heritage Western Cape immediately.



**Photo 1:** East-facing view along Rietvlei Road showing boundary fences to adjoining residential estate (left) and golf estate (right).



**Photo 2:** South-facing view of palisade fence to property at the very end of Rietvlei Road. Pedestrian access/ footpath leading to estuary (traversing easternmost portion of property) visible to left.



**Photo 3:** East-facing view along footpath leading to Keurbooms River estuary.



**Photo 4:** West-facing view of the property from said footpath. Steep vegetated slope (not to be developed) and existing main dwelling visible in background.





**Photo 5:** Southeast-facing view taken from close to easternmost property boundary looking towards the adjoining Goose Valley Golf Resort.



**Photo 6:** Northwest-facing view down vehicle access route from main dwelling. Area proposed to be developed.



**Photo 7:** Existing modern main dwelling.



**Photo 8:** Northeast-facing view from garden to main dwelling across adjoining landscape and Keurbooms River estuary.



**Photo 9:** East-facing view across Keurbooms River estuary from highest point on the property.



**Photo 10:** Southeast-facing elevation of main dwelling and southern cadastral boundary of property.



**Photo 11:** West-facing of outbuilding (former paddocks) across southern portion of the property.



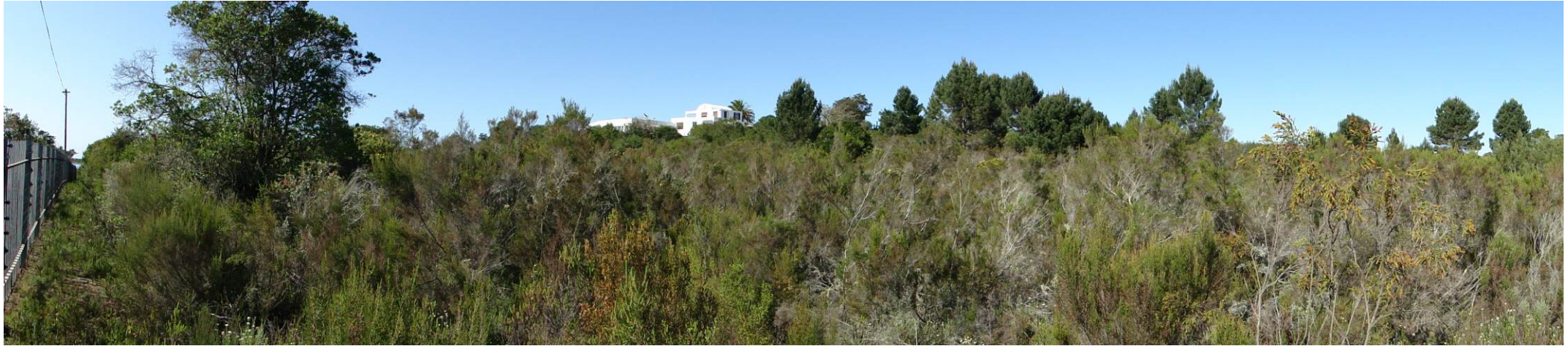
**Photo 12:** West-facing view across western portion of the property (former paddocks). Dwellings forming part of Goose Valley Golf Estate visible in the background.



**Photo 13:** North-facing view – main entrance and Rietvlei Road. Two "stone features" noted in AIA noted within dense vegetation at lower end of slope to the right of entrance.



**Photo 14:** East-facing from entrance gate along driveway leading to main dwelling.



**Photo 15:** East-facing view along northern cadastral boundary. Two "stone features" noted within dense vegetation visible here.



**Photo 16:** West-facing view across western portion of the property – area proposed to be developed.



**Photo 17:** South-facing view of little used gate along the southern property boundary leading to adjoining golf estate.



**Photo 18:** South-facing view from Rietlei Road across golf course, dwellings on adjoining Goose Valley Golf Estate.



**Photo 19:** Northwest facing view to residential estate from Rietvlei Road (opposite Goose Valley Golf Estate).



PORTION 38 OF THE FARM  
GANSE VALLEI NO 444

SITE DEVELOPMENT PLAN

LEGEND:

ZONING	QTY	HA	%
Residential Zone II (Group housing)	1	3.17	36.9
Open Space Zone III (Nature reserve)	1	5.41	63.1
High Sensitivity Area			
Very High Sensitivity Area			
<b>TOTAL</b>	<b>2</b>	<b>8.58</b>	<b>100</b>

- NOTES
- For erf data, refer SG6687/1948
  - Sizes & dimensions are approximate and subject to final survey
  - 1m contour intervals based on Contour Plan from SJM Surveys dated October 2008
  - (17) x Sectional Title Group Housing Units (700m<sup>2</sup> each)
  - 3m Perimeter Building Lines proposed
  - (2) x Garage bays / unit  
(18) x Visitor parking bays
  - Density (max 20u/ha) = 1.98 u/ha
  - Communal Open Space (min 80m<sup>2</sup>/unit) = > 7 ha
  - Internal Road Width = 5m
  - 5m Buffer Area around potential burials

DRAWN:	HL	CHECKED:	MV
PLAN NO:	Pr22/11/F444Ptn38/SDP05		
PLAN DATE:	15 NOVEMBER 2022		
STORED:	z:\drawings\App\Pr2211-F444Ptn38/SDP05.dwg		

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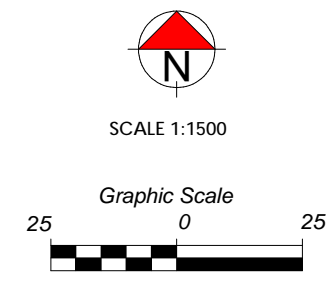
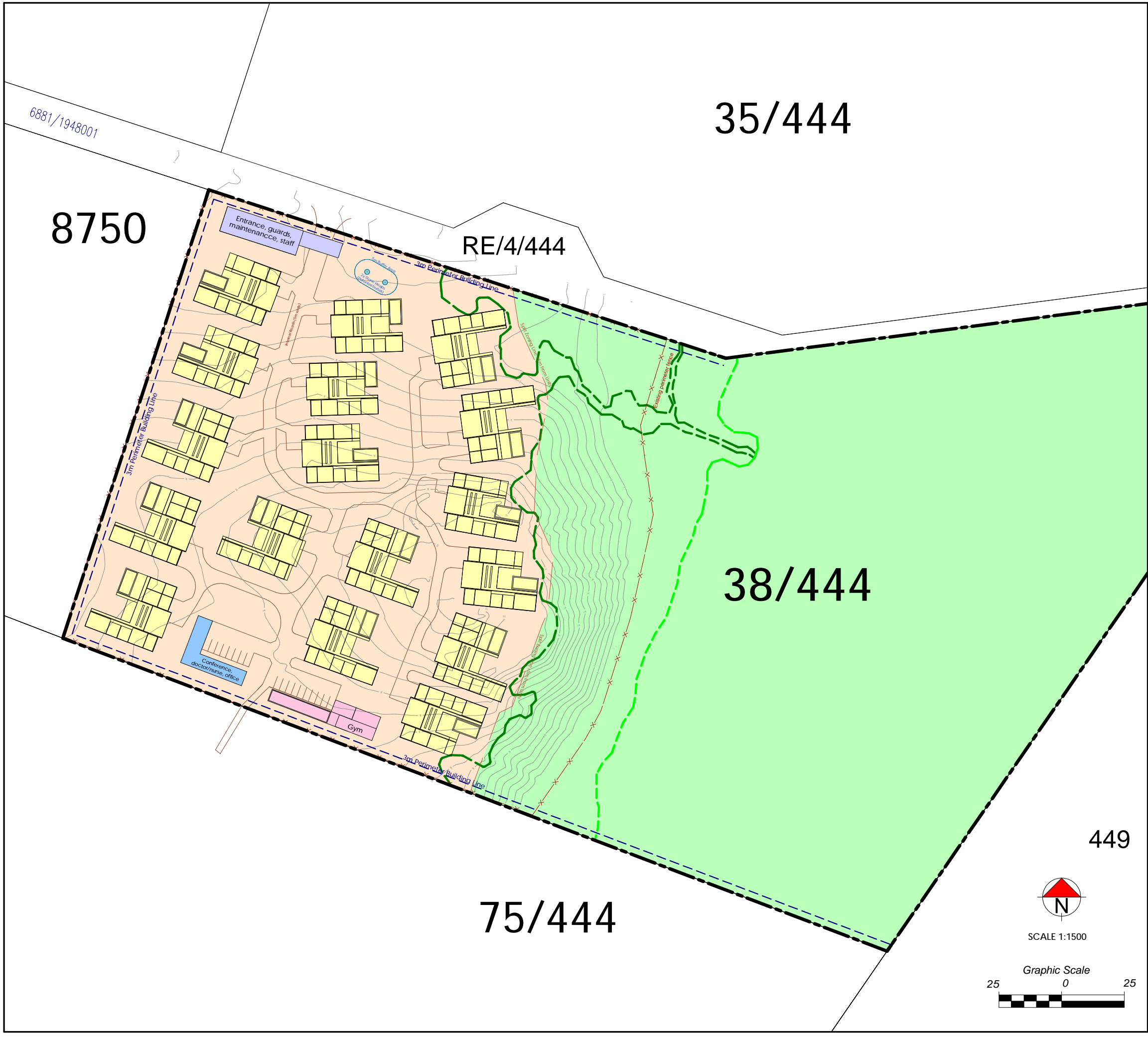
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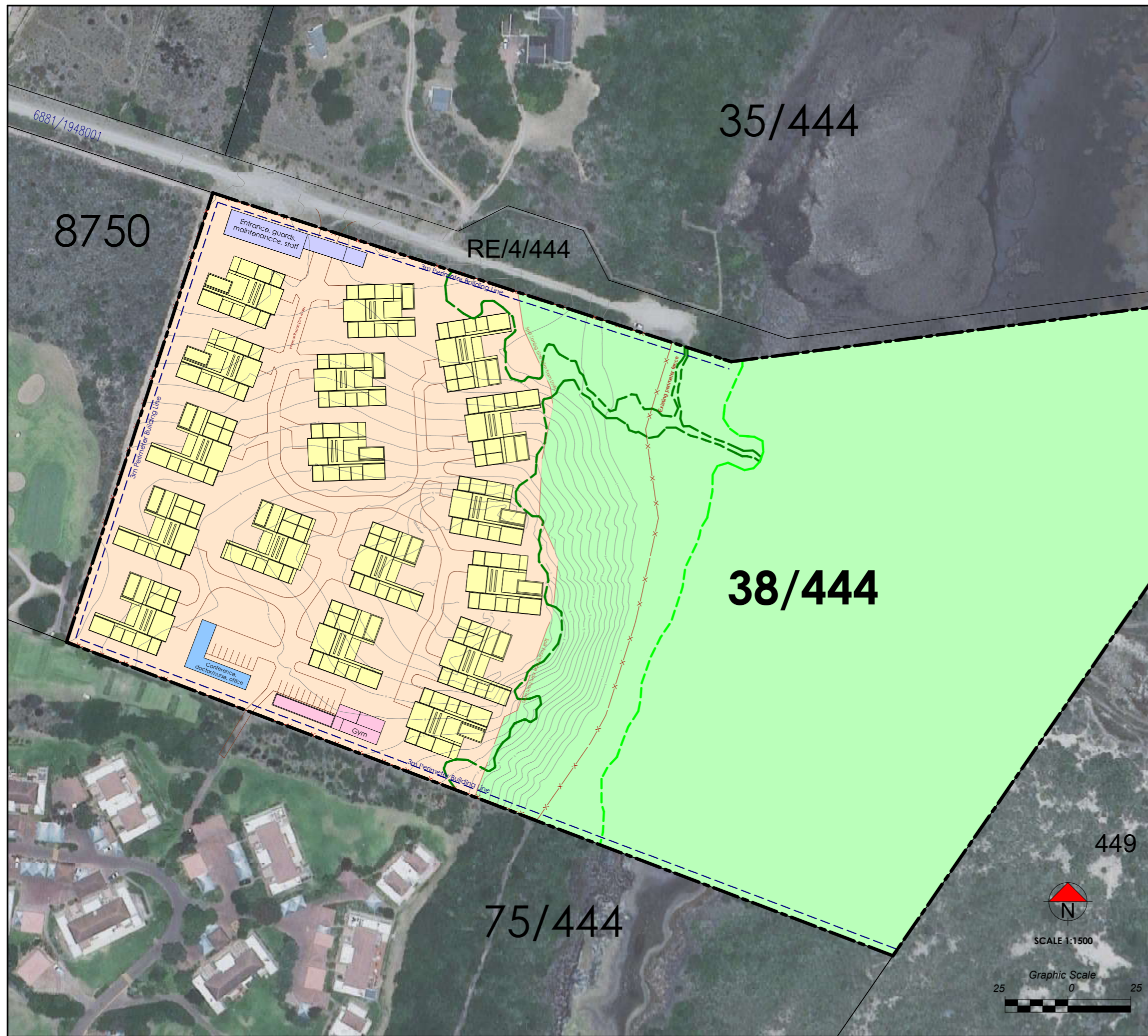


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e-mail: marika@vreken.co.za  
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URBAN & ENVIRONMENTAL PLANNERS





**PORTION 38 OF THE FARM  
GANSESVALLEI NO 444**

**SITE DEVELOPMENT PLAN**

**LEGEND:**

ZONING	QTY	HA	%
Residential Zone II (Group housing)	1	3.17	36.9
Open Space Zone III (Nature reserve)	1	5.41	63.1
High Sensitivity Area			
Very High Sensitivity Area			
<b>TOTAL</b>	<b>2</b>	<b>8.58</b>	<b>100</b>

- NOTES**
1. For erf data, refer SG6687/1948
  2. Sizes & dimensions are approximate and subject to final survey
  3. 1m contour intervals based on Contour Plan from SJM Surveys dated October 2008
  4. (17) x Sectional Title Group Housing Units (700m<sup>2</sup> each)
  5. 3m Perimeter Building Lines proposed
  6. (2) x Garage bays / unit  
(18) x Visitor parking bays
  7. Density (max 20u/ha) = 1.98 u/ha
  8. Communal Open Space (min 80m<sup>2</sup>/unit) = > 7 ha
  9. Internal Road Width = 5m

<b>DRAWN:</b>	HL	<b>CHECKED:</b>	MV
<b>PLAN NO:</b>	Pr22/11/F444Ptn38/SDP04		
<b>PLAN DATE:</b>	26 MAY 2022		
<b>STORED:</b>	z:\drawings\App\Pr2211-F444Ptn38/SDP04.dwg		

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**AIA: PROPOSED RESIDENTIAL DEVELOPMENT GANSE VALLEI 444/38,  
KEURBOOMS RIVER, PLETTENBERG BAY, WESTERN CAPE**

(In terms of Section 38(8) of the NHRA (No 25 of 1999))

**Case Number: 22101907AM1019E**

Prepared for:  
Perception Planning

On behalf of:  
True Motives 99 PTY LTD



Prepared by:

Lita Webley  
5 Oaktree  
3 Cornwall Place  
Kenilworth  
7708

[lita@webleyonline.com](mailto:lita@webleyonline.com)

16 January 2023

## EXECUTIVE SUMMARY

### Site Name

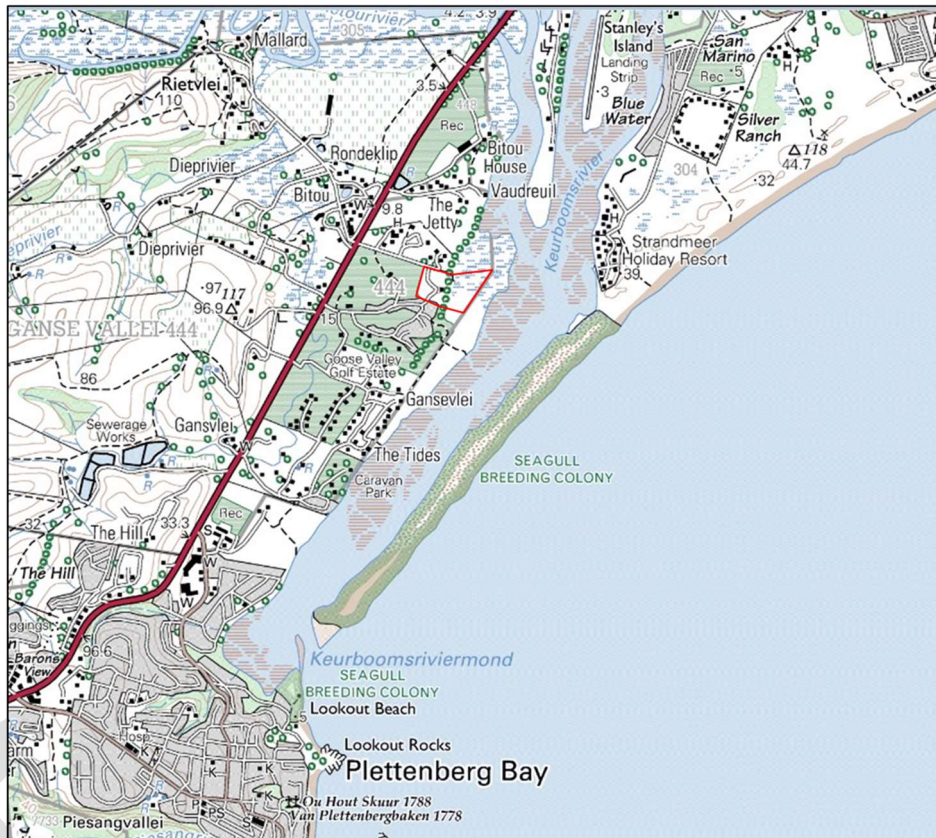
Ganse Vallei 444/38, Keurbooms River, Plettenberg Bay.

### Location

The property is 8 ha in extent. It is located south of the Rietvlei Road and near the estuary of the Keurbooms River, Plettenberg River.

The centre of the study area is located at: S34.024965°, E 23.387418°

### Locality Plan



1:50 000 map 3423 Plettenberg Bay (2006) – the development is indicated by the red polygon.

### Description of Proposed Development

The property was initially assessed in 2009 by Dr P Nilssen (field based Archaeological Impact Assessment) and Dr J Pether (desktop palaeontological study) for the construction of a hotel. *The development did not take place and the property was sold to a new owner who has proposed demolishing the existing house and constructing seventeen residential (sectional title) housing units, a club house and a private nature reserve.* At least half of the property consists of wetlands which will not be developed.

Three alternatives have been proposed.

Alternative 1 is the preferred alternative. Both Alternative 1 and Alternative 2 comprise 17x sectional title group housing units, a club house and a nature reserve but they differ in the layout of the units.

Alternative 3 is the 'No go' Alternative.

Alternative 1, which includes the recommended buffer of 5m around the stone features, is the preferred Alternative.

### ROD issued by HWC in 2009

An application for the same property was considered by the BELCOM on the *29 January 2009* and it was endorsed (Appendix 1) subject to the following condition:

- If any archaeological material is discovered during earth moving activities all work must be stopped and HWC must be notified immediately.

An AIA by Dr Peter Nilssen was submitted to the APM Committee of HWC on 1 April 2009 (Case Number 37/ROD ID 275) and they agreed (Appendix 2) that:

- The recommendations in the AIA were accepted
- The proposal was approved subject to the Palaeontological scoping study (as per the February ROD from HWC).

The desktop PIA by Dr John Pether was submitted to the APM Committee of HWC on the 2 June 2009 (Case No 37/ROD ID 418) and it was agreed (Appendix 3) that:

- Archaeological monitoring of bulk earthmoving activities must take place.
- The Archaeologist must report any occurrences of fossils and a Palaeontologist must record the exposed sections before the trenches are closed up.

### **HWC response to the NID 2022**

In response to the NID (4 November 2022), Heritage Western Cape requested an integrated HIA, comprising an *Archaeological Impact Assessment* (AIA). The HIA must have an overall assessment of the impacts to heritage resources which are not limited to the specific studies referenced above (see Appendix 4).

### **Archaeological Resources Identified in 2022**

In his 2009 survey, Nilssen reported that he had identified no archaeological resources with the exception of “two small stone features that might represent burials of small children or some animals”. It is unfortunate that he identified the stone features as possible graves as this has created uncertainty about the heritage resources on the site. Nilssen, did not question the homeowner, who is since deceased, about the origin of the stone features.

Webley re-surveyed the property on 10 October 2022, as part of the NID process, in order to assess the “two stone features”. She observed the following:

- There is no evidence of any pre-colonial or colonial period archaeology on the property. There is a slight possibility of archaeological material under the dune which covers the southern portion of the property.
- The two stone features consist of quartzite cobbles. They are small in size, overgrown with indigenous bush and some 4m apart.

It was observed that there are quartzite cobbles distributed throughout the area, in the undergrowth, under the Rietvlei Road and down to the boardwalk leading to the Keurbooms River estuary. The cobbles are part of an old beach terrace.

### **Oral History**

The previous owner was deceased, and his son was traced but could not provide any additional information. The estate agent who had sold the property was also consulted but had no further information.

### **Anticipated Impacts on Archaeological Resources**

Since graves in general are graded as Grade IIIA, impacts could be high.

If the two stone features represent graves, then they would be negatively impacted by construction activities on the site during the development of the residential units.

However, there is also a possibility that the two stone features are not graves but the result of other construction or landscaping actions on the property.

### **Mitigation Proposals in 2009**

In his recommendations, Nilssen (2009) proposed full time archaeological monitoring of vegetation clearing and earthmoving activities. This measure was to ensure that potential negative impact on archaeological materials would be avoided or minimized. He also recommended archaeological excavations of the two stone features.

### **Recommendations**

A second field visit in 2022 confirmed that the two stone features are located on an old beach terrace of quartzite river cobbles, exposed along the northern section of the property. A section of this “beach terrace”, described by Pether (2009), is also visible under the Rietvlei Road.

The two stone features can be interpreted in numerous ways, and it is not clear whether they represent graves or not.

It is recommended that development proposals are endorsed subject to the following recommendations:

- Alternative 1, the preferred alternative, is supported.
- The buffer of 5 m, which has already been incorporated into the layout for Revised Alternative 1, must be implemented. The two stone features must be fenced during the earth moving activities, to protect them from accidental impact.
- An archaeologist must be on site to monitor earth moving activities, particularly those areas around the stone features.
- In view of the possibility of fossil shells (Desktop PIA 2009), the Fossil Finds Protocol must be included in the EMPr.

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 must report this to Heritage Western Cape. 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.

**Author and Date**

Dr Lita Webley                      January 2023.

DRAFT

## SPECIALIST DECLARATION

I, Lita Webley, as the independent specialist for this application declare that I –

- act as an independent specialist (archaeologist) in this application;
- regard the information contained in this report as it relates to my specialist input/study to be true and correct;
- do 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 and will not have no vested interest in the proposed activity proceeding;
- 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;
- am 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;
- am aware that a false declaration is an offense in terms of regulation 48 of GN No. R. 982.



-----  
Signature of the specialist

Name of company: Dr Lita Webley  
Professional Archaeologist and Specialist Heritage Practitioner

Date: January 2023

## GLOSSARY

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

**Early Stone Age:** The archaeology of the Stone Age between 2 500 000 and 200 000 years ago.

**Fossil:** Mineralised bones of animals, shellfish, plants and marine animals. A trace fossil is the track or footprint of a fossil animal that is preserved in stone or consolidated sediment.

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

**Holocene:** The most recent geological time period which commenced 10 000 years ago.

**Late Stone Age:** The archaeology of the last 20 000 years associated with fully modern people.

**Middle Stone Age:** The archaeology of the Stone Age between 200 000 and 20 000 years ago associated with early modern humans.

**National Estate:** The collective heritage assets of the Nation

**Palaeontology:** Any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trace.

**Pleistocene:** A geological time period (of 2.5 million – 10 000 years ago).

**SAHRA:** South African Heritage Resources Agency – the compliance authority which protects national heritage in the Northern Cape.

**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

AIA	Archaeological Impact Assessment
CRM	Cultural Resource Management
DEA	Department of Environmental Affairs
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
ESA	Early Stone Age
EMP	Environmental Management Program
GPS	Global Positioning System
HIA	Integrated Heritage Impact Assessment
LSA	Late Stone Age
MSA	Middle Stone Age
NID	Notice of Intent to Develop
NHRA	National Heritage Resources Act, No 25 of 1999
SAHRA	South African Heritage Resources Agency
SAHRIS	South Africa Heritage Resources Information System



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Appendix 1: Record of Decision: BELCom, 29 January 2009

Appendix 2: Comment: APM, 1 April 2009

Appendix 3: Comment: APM, 2 June 2009

Appendix 4: Response to the NID, 4 November 2022.

## List of Figures

- Figure 1:** Extract of the 1:50 000 map 3423 Plettenberg Bay (2006). Source of Map: Chief Directorate: National Geo-Spatial Information. Website: [www.ngi.gov.za](http://www.ngi.gov.za).
- Figure 2:** Google Earth image of the property. Approximately half of the land is located in the Keurbooms River estuary and cannot be developed.
- Figure 3:** The proposed development (Alternative 1, the preferred alternative). The location of the two stone features in the north of the property.
- Figure 4:** The contour map of the western portion of the property indicates the steep slope down to the estuary.
- Figure 5:** View (westward) of the elevated dune with the residence, overlooking the estuary.
- Figure 6:** View (eastward) from the front lawn of the house, toward the estuary.
- Figure 7:** View eastward, along the fence down to the Keurbooms River estuary. Note the height of the vegetation.
- Figure 8:** View of vegetation in the northern section of the property.
- Figure 9:** The Rietvlei Road, which runs along the northern boundary of the property, is underlain by beach cobbles
- Figure 10:** The stone features photographed by Nilssen in 2009.
- Figure 11:** Tracks and sites recorded by Nilssen (2009). The red dots (1 & 2) indicate the location of the two cobble features.

- Figure 12:** Survey by Webley (2022). All the white stars represent quartzite cobbles. Their distribution is restricted to the area north of the white stippled line. The red stars represent the stone features.
- Figure 13:** Stone Feature 1 (left) and stone feature 2 (right). The scale is 20cm in length.
- Figure 14:** Cobbles scattered throughout the area in the undergrowth

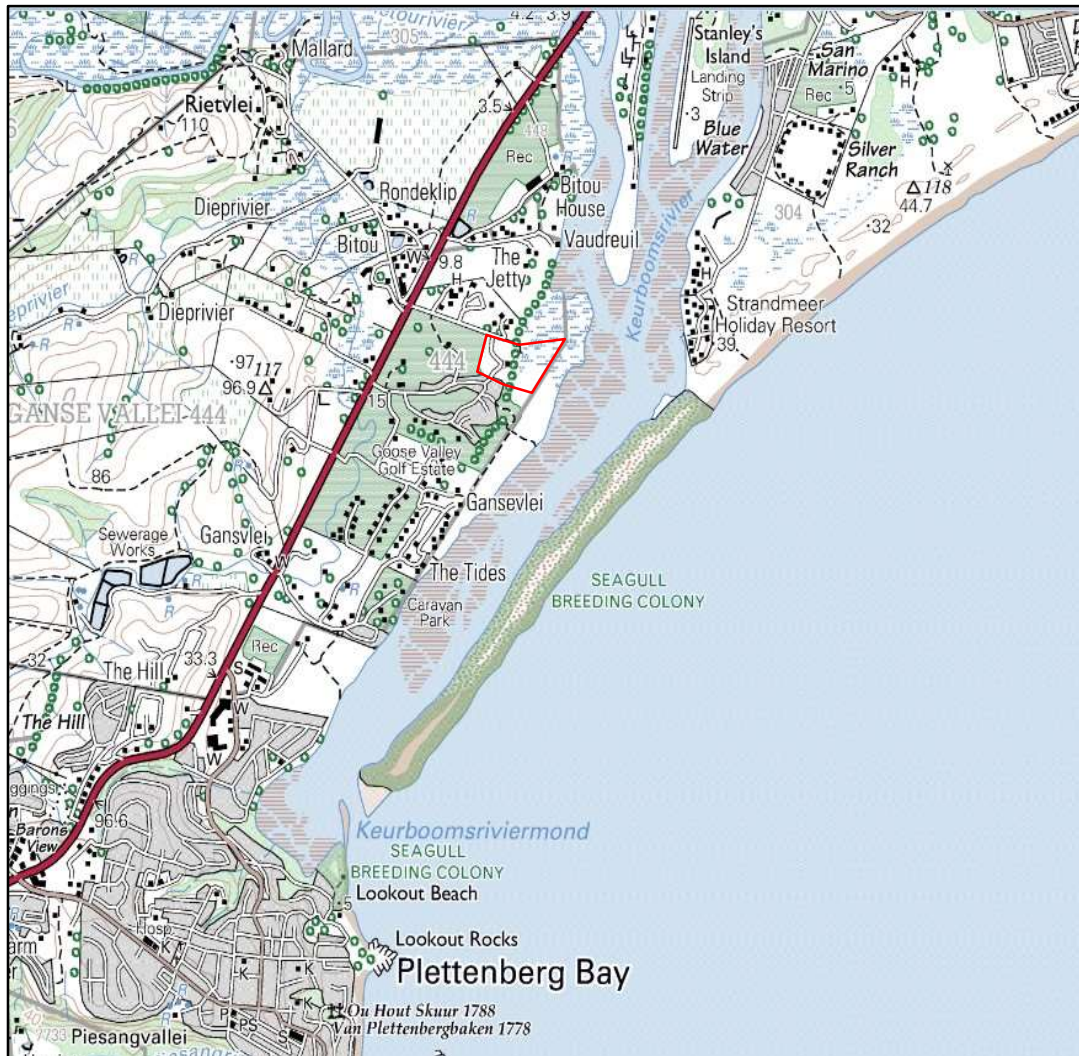
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## 1. INTRODUCTION

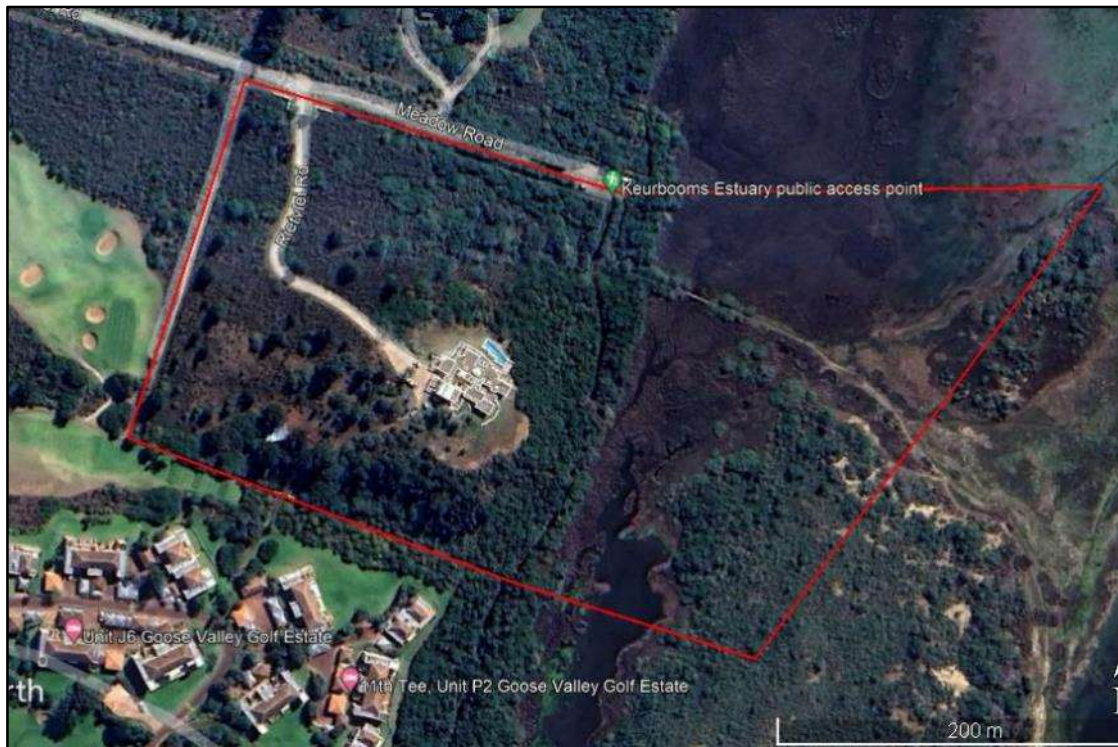
Lita Webley was appointed by Perception Planning, on behalf of the registered landowner (True Motives 99 PTY LTD) to compile an Archaeological Impact Assessment as part of the Heritage Impact Assessment for the property, Ganse Valleï 444/38 (some 8 ha in extent), located to the south of the Keurbooms River near Plettenberg Bay, Bitou Municipality.

The property had been previously assessed by Dr P Nilssen (field based Archaeological Impact Assessment) and Dr J Pether (desktop palaeontological study) in 2009 for the construction of a hotel. The development did not take place and the property was sold to a new owner who has proposed demolishing the existing dwelling and constructing seventeen sectional title units and a clubhouse.

The centre of the study area is located at: S34.024965°, E 23.387418°



**Figure 1:** Extract of the 1:50 000 map 3423 Plettenberg Bay (2006). Source of Map: Chief Directorate: National Geo-Spatial Information. Website: [www.ngi.gov.za](http://www.ngi.gov.za). The red polygon indicates the location of the property on the Keurbooms River and to the north of the Goose Valley Golf Estate.



**Figure 2:** Google Earth image of the property. Approximately half of the land is located in the Keurbooms River estuary and cannot be developed.

## 2. DEVELOPMENT PROPOSALS

The site is largely vacant with a dwelling in the centre, on the ridge, and a small stable to the south-west, adjoining the Goose Valley Golf Estate (Figures 1 & 2). It is intended to demolish the current homestead.

The owners of the property (True Motives 99 (Pty) Ltd) wish to apply for developmental rights on the property, in order to allow a group housing development, consisting of (17x) sectional title group housing units.

The layout of the proposed development was carefully designed, to take into consideration the steep slopes of the terrain.

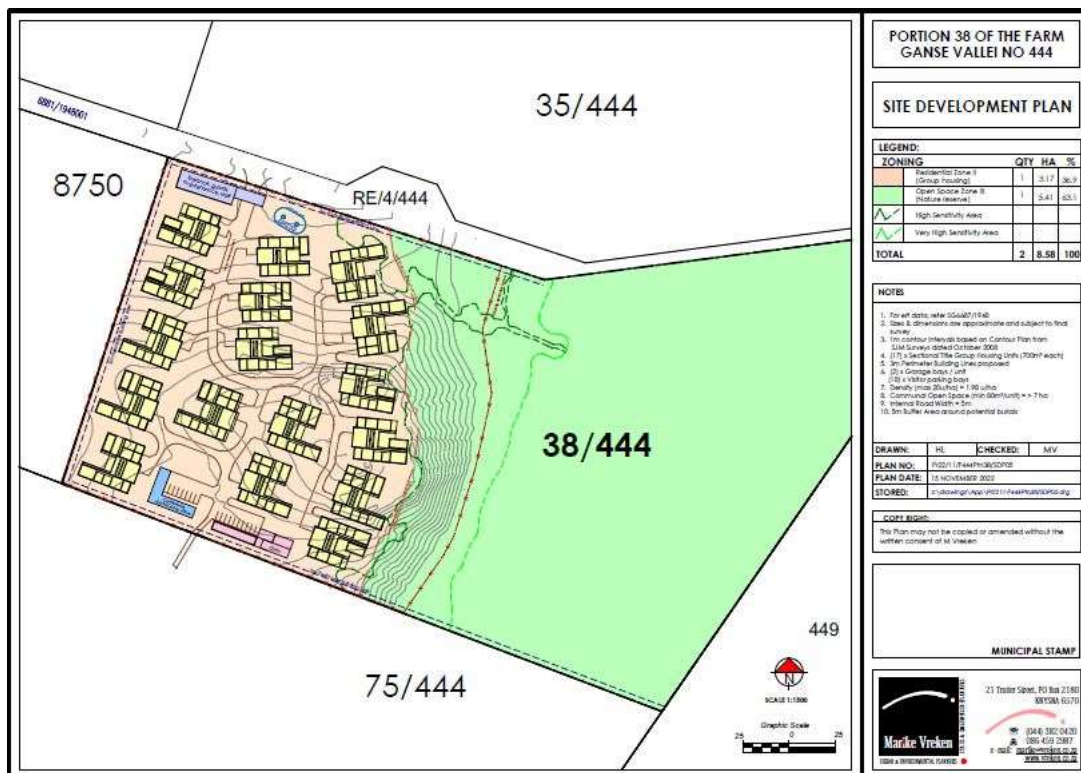
The development will be single storey units. The ground floor of the front stands will be lowered to allow the second row stands also to enjoy the lagoon views. Each property will have at least 80 m<sup>2</sup> of communal space per dwelling and two parking bays per unit. Access will be from Rietvlei Road.

### 2.1 Identification of Alternatives

The following three alternatives have been considered:

- Alternative 1 (Preferred Alternative) comprises a group housing development. The preferred layout consists of (17x) sectional title group housing units, a club house with communal recreational facilities and a private nature reserve. The revised layout has been adjusted to provide for a 5m buffer around the stone features (Figure 3).
- Alternative 2 comprises a group housing development. Alternative 2 have a different layout of units, that also consists of (17x) sectional title group housing units, a club house with communal recreational facilities and a private nature reserve.
- Alternative 3: 'No go' Alternative.

Alternative 2 is not considered desirable as it encroaches onto the highly sensitive areas to the east of the property which will result in the destruction of sensitive vegetation.



**Figure 3:** The proposed development (Alternative 1, the preferred alternative) which was amended to provide for a buffer around the two stone features in the north of the property (circled in blue).

### 3. LEGISLATIVE CONTEXT

While the National Department of Environmental Affairs is the decision making authority acting in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA) and Regulations (2014), they must ensure that the evaluation of the statutorily defined broad range of heritage resources fulfils the requirements of the relevant heritage resources authority in terms of Section 38 (8) of the National Heritage Resources Act (Act 25 of 1999) (NHRA) and that any comments and recommendations of the relevant heritage resources authority with regard to proposed development have been taken into account prior to the granting of the consent.

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

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

#### 3.1 Archaeology (Section 35(4))

No person may, without a permit issued by HWC, destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite.

Archaeological is defined as: “material remains resulting from human activity which is in a state of disuse and is in or on land and which is older than 100 years, including artefacts, human and hominid remains and artificial features and structures”.

In terms of the definition, an archaeological survey therefore includes any ruined structures older than 100 years.

### 3.2 Burial grounds and graves (Section 36(3))

No person may, without a permit issued by the South African Heritage Resources Authority (SAHRA), destroy, damage, alter, exhume or remove from its original position or otherwise disturb any grave or burial ground older than 60 years, which is situated outside a formal cemetery administered by a local authority. Since Heritage Western Cape have taken responsibility for administering Section 36, applications for a permit for exhumation would have to be addressed to them.

Consultation is further described under Section 36(5) of the NHRA, where it states that SAHRA (or the responsible heritage authority) may not issue a permit (or Workplan) unless it is satisfied that that the applicant has:

- a) Made a concerted effort to contact and consult communities and individuals who by tradition have an interest in such grave or burial ground; and
- b) reached agreements with such communities and individuals regarding the future of such grave or burial ground.

Public consultation is explained in "Heritage Western Cape: Public Consultation Guidelines (June 2019)". In terms of Section 38(3)(e) the archaeological investigation of the stone features (potentially graves), would trigger broader consultation than requesting the views of the registered local conservation bodies and the local authority. Further public consultation actions could include an advertisement in a local newspaper, engagement with local Khoisan community leaders and possibly a public meeting. More recently, the APM Committee of HWC have recommended leaving human remains *in situ* or else reburial on site or in an adjacent area.

### 3.3 Grading

Heritage resources are graded following the grading guidelines, "Grading: Purpose and Management Implications" as approved by Heritage Western Cape in 2016.

**Table 1: Grading of Heritage Resources**

Grade	Level of significance	Description
I	National	Of high intrinsic, associational and contextual heritage value within a national context, i.e. formally declared or potential Grade 1 heritage resources.
II	Provincial	Of high intrinsic, associational and contextual heritage value within a provincial context, i.e. formally declared or potential Grade 2 heritage resources.
IIIA	Local	Of high intrinsic, associational and contextual heritage value within a local context, i.e. formally declared or potential Grade IIIA heritage resources.
IIIB	Local	Of moderate to high intrinsic, associational and contextual value within a local context, i.e. potential Grade IIIB heritage resources.
IIIC	Local	Of medium to low intrinsic, associational or contextual heritage value within a national, provincial and local context, i.e. potential Grade IIIC heritage resources.
NCW		Not conservation-worthy. The Heritage Authority has applied its mind and the resourced does not have enough heritage significance to be included in the National Estate.

### 3.4 HWC Communication in 2009 and 2022

An application for the same property was considered by the BELCOM on the 29 January 2009 and endorsed (Appendix 1) subject to the following condition:

- If any archaeological material is discovered during earth moving activities all work must be stopped and HWC must be notified immediately.

An AIA by Dr Peter Nilssen was submitted to the APM Committee of HWC on 1 April 2009 (Case Number 37/ROD ID 275) and they agreed (Appendix 2) that:

- The recommendations in the AIA were accepted

- The proposal was approved subject to the Palaeontological scoping study (as per the February ROD from HWC).

The desktop PIA by Dr John Pether was submitted to the APM Committee of HWC on the 2 June 2009 (Case No 37/ROD ID 418) and it was agreed (Appendix 3) that:

- Archaeological monitoring of bulk earthmoving activities must take place
- The Archaeologist must report any occurrences of fossils and a Palaeontologist must record the exposed sections before the trenches are closed up.

The Notice of Intent to Develop (NID) was prepared by Perception Planning and submitted to Heritage Western Cape (HWC). They responded (4 November 2022) requesting an integrated Heritage Impact Assessment (HIA) comprising an **Archaeological Impact Assessment (AIA)**. The HWC response is attached as Appendix 4.

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

#### 4. TERMS OF REFERENCE AND METHODOLOGY

A survey of available literature was carried out to assess the archaeological heritage of the area. The information sources are provided in Table 2 below.

**Table 2: Sources of Information**

Data/Information	Source	Date	Type	Description
Maps	Chief Directorate: National Geo-Spatial Information	Various	Spatial	Current 1:50 000 topographic maps of the study area and immediate surrounds
Satellite imagery	Google Earth	Various	Spatial	Current and historical satellite imagery of the study area and immediate surrounds
Background data	South African Heritage Resources Information System (SAHRIS)	Various	Reports	Previous impact Assessments for developments in the vicinity of the study area.
Background data	Books, journals, theses, websites	Various	Books, journals, theses, websites	Literature of the study area and it surrounds containing relevant material on archaeology or history.

Since HIA reports from the Western Cape Province that are more recent than 2009, are not on the SAHRIS database, the literature on archaeological resources in the general vicinity of the study area is out of date. While it is possible that there is CRM literature more recent than 2009, it is not readily available to heritage practitioners.

##### 4.1 Field Survey

A field assessment was undertaken on the 10<sup>th</sup> October 2022, as part of the NID process, to assess the so-called “graves” identified by Nilssen in his 2009 survey. The position of identified archaeological resources was plotted using a handheld GPS unit set on the map datum WGS84. A track of the paths was captured, and digital images were taken of the area and archaeological resources. The survey was conducted in spring. However, the thick vegetation is not of a seasonal nature, and a survey in other seasons of the year would make no difference.

Particular attention was paid to the stone features which had been recorded by Nilssen in 2009.

##### 4.2 Limitations

The most significant limitation is the very dense vegetation, a combination of indigenous and alien bush which exceeds 2m in height in the northern, western and easter parts of the property. Nilssen found it particularly difficult







**Figure 5:** View (westward) of the elevated dune with the residence, overlooking the estuary.



**Figure 6:** View (eastward) from the front lawn of the house, toward the estuary.



**Figure 7:** View eastward, along the fence down to the Keurbooms River estuary. Note the height of the vegetation.



**Figure 8:** View of vegetation in the northern section of the property.



**Figure 9:** The Rietvlei Road, which runs along the northern boundary of the property, is underlain by beach cobbles

## **6. LOCAL GEOLOGY**

The geology of the Keurbooms River estuary is particularly significant to this discussion as it explains the dense cobble distribution in the northern part of the property.

The eastern part of the property is located on a low wetland, while the current dwelling sits on top of a 'low ridge' at a height of 14-18 m asl (above sea level) (Figure 5). Nilssen (2009) has characterised the ridge as a "hill-like dune". It is not clear whether the ridge was formed by wind action, but the southern and western part of the property comprises very loose, dune sands sloping sharply to the east (wetland) and north (to the Rietvlei Road) (Figures 2 & 9). Road cuttings have revealed that these coastal barrier dunes are positioned against the edge of the coastal platform (Döckel 1998) and there may be at least three barrier dunes between Plettenberg Bay and Keurboomstrand.

In his desktop study, Pether (2009), commented that *the property is partly located on a late Quaternary conglomeratic "beach terrace" adjacent to the Keurbooms River estuary*. According to Pether, the geological history of the area over the last ~ 100 million years (mya), comprise 'coastal platforms' or 'marine terraces' which step down to the present coast. After ~ 3 mya, during the Quaternary period, sea levels fluctuated with various ice ages, and the coastal rivers eroded the valleys to deeper levels. These raised beaches are found at low elevations around the coast.

Hart (2001) during his survey to the immediate south of the property, noted the “presence of quartzite cobble terraces” indicating that the area was affected by fluctuations in the flood plain of the Keurbooms River. *Studies on the position of the Keurbooms River estuary indicate considerable movement over the course of the last one hundred years, and it is likely that any archaeological remains near to the mouth would have been destroyed.*

## **7. REVIEW OF ARCHAEOLOGICAL CONTEXT**

### **7.1 Pre-colonial Archaeology**

The coastline around Plettenberg Bay is well known for its archaeological sites. More than 36 sites, including 22 caves, were recorded by Kaplan during his 1993 survey. Most of the sites are located on the Robberg Peninsula. Records from the Archaeological Data Recording Centre at Iziko shows a single shell midden at the Keurbooms River beach. The archaeological site of Matjies River Rock Shelter, about 1km to the east of the Keurboom River, is one of the deepest shell middens excavated along the southern Cape coast. Initially excavated in the 1930's, then again in the 1950's and finally in the 1990s by Hilary Deacon, the archaeological deposits date to the last 12 000 years. It is the closest PHS to the study area.

Hilary Deacon (2007) surveyed the alternative routes for the Robberg-Bitou 66kV powerline, noting that potential impacts to archaeological and palaeontological resources are considered to be low.

In his 1999 survey of the property on the northern bank of the Keurbooms River estuary, Kaplan identified a single, low density scatter fragmented shellfish, some ostrich eggshell fragments and flaked stone on a high, partially vegetated sand dune.

During her 2004 survey of Portions 8 and 43 of Ganse Vallei 444 (which are *inland* of the study area), Webley noted that there was a clearly visible cobble horizon on the koppie at an elevation of approximately 65-75 m above sea level, and a second cobble horizon at 100 m above sea level. These cobbles presumably related to previous river terraces. She noted that the quartzite ESA and MSA implements found on the site, and made on these cobbles, were randomly scattered and did not appear to represent a habitation site.

Hart (2001) surveyed portions 36, 37, 48 and 88 as well as a portion of 38 of Ganse Vallei 444 for the Turtle Creek Golf Estate, which is located to the south (an adjoining Goose Valley Golf Estate) at Plettenberg Bay (Figure 1). During his survey, the site had been cleared of vegetation. He reported finding very little archaeological material but comments: “the presence of cobble terraces (without beach material) indicates that the area was periodically effected by fluctuations in the flood plain of the Keurbooms River”. He ascribed the absence of archaeological material to the sandy beach, which is less productive in terms of easy food resources for prehistoric people. One of the observations which he made was of a ‘cobble terrace of river washed quartzite stones in a dirt track” which sound very similar to the observations which Webley (2004) made further inland.

*Archaeologists who have worked in this area seem to agree that the archaeological sensitivity of the coastal zone is low, and while there may be ESA and MSA artefacts made on the quartzite beach/river cobbles, they are considered of low significance.*

### **7.2 Historical Archaeology**

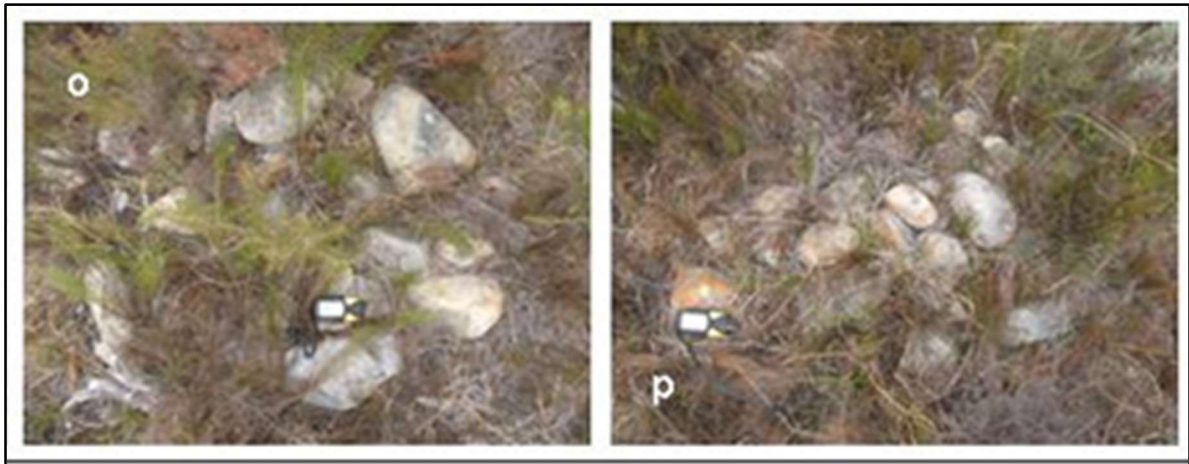
The integrated HIA summarises the general history of the area as well as the study area. Briefly, early Portuguese explorers travelled along this stretch of the coast in the 15<sup>th</sup> century. We know that the survivors of the wreck of the San Gonzales spent a year in the bay in 1630, before returning to Portugal. Historical archaeological excavations have been conducted at the wreck site, near the Robberg headland further to the south. Governor van Plettenberg visited the Bay in 1778 and named it after himself. A timber store was constructed at Plettenberg Bay in 1787 for the shipping of timber to Cape Town. This store was subsequently replaced by a smaller store in 1803. The walls of the early store were declared a PHS and are located in Plettenberg Bay (some 3,5km to the south of the study area).

The property forms part of the original loan farm “Ganze Valley”, surveyed in 1818 and granted to R van Rooyen. The original 1818 diagram indicates the location of a single residential structure set back from the coast and some distance southwest of the study area.

### **7.3 Results of the 2009 Archaeological Survey**

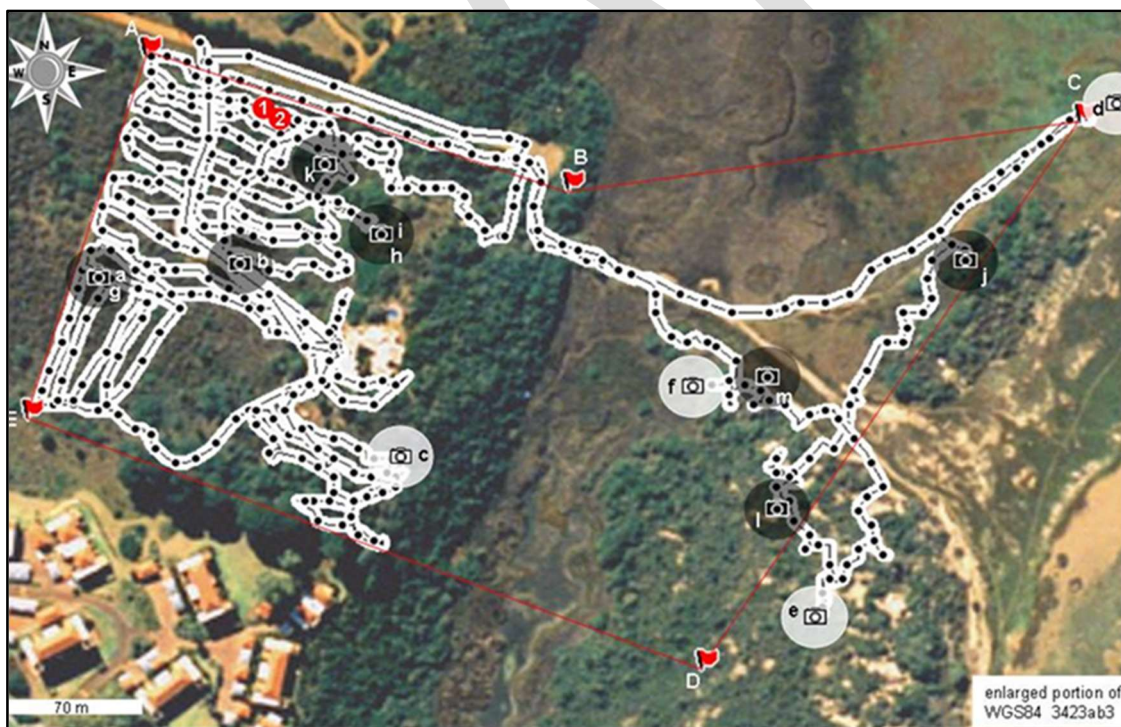
Due to the very dense vegetation covering the site, Nilssen (2009) commented that only selected portions could be surveyed and assessed although the tracks in Figure 11 suggest that he was able to cover a substantial part of the property. Nilssen did not identify any stone age artefacts or other archaeological resources. There were no evidence of shell middens remains and no historical remains.

However, Nilssen did record **two quartzite cobble features** in the northern section of the property, adjoining the Rietvlei Road, which he recorded photographically and by means of a GPS, using a Universal Transverse Mercator (UTM) geographic coordinate system. He described them as “two small stone features that might represent burials of small children or some animals”.



**Figure 10:** The stone features photographed by Nilssen in 2009.

Unfortunately, this description created the impression that the stone features were in fact burials (of human individuals or pets). No attempt was made to interview the owner (now deceased) to verify this identification.



**Figure 11:** Tracks and sites recorded by Nilssen (2009). The red dots (1 & 2) indicate the location of the two cobble features.

## 8. RESULTS OF THE 2022 SURVEY

During a site assessment by Webley for the NID application, she noted an archaeological survey can only be undertaken after vegetation clearance has taken place. Archaeological visibility was restricted to the horse

paddocks, the cleared area around the perimeter fence and the landscaping around the house (Figure 12). The driveway was bricked, and the surface was not visible.

After a search, the two heaps of quartzite cobbles identified by Nilssen were located, and the bush was cut back to reveal their extent. The original photographs from 2009 suggested that they were more raised at that time and covered in indigenous grasses. During the 2022 inspection they appeared flatter and covered in more bush. They were photographed, measured and the area immediately around the features was examined.

**Feature 1:** This feature is 1m x 80 cm. It is round in shape. One of the stones on the cairn comprises a piece of Enon conglomerate (Figure 13)

**Feature 2:** The quartzite cobbles and rocks appear to have collapsed and spread out more, but this feature is also approximately 1 m in size (Figure 13).

The two features are about 4 m apart. Despite the dense vegetation, an area around the 2 features was examined.

It was observed that there are quartzite cobbles *spread throughout the area in the undergrowth* as reflected in Figure 14. The only exception is site recording 009, which is a small garden path artificially constructed as part of the landscaping of the garden (Table 3). The site visit suggested that the cobbles are not restricted to the two stone features but are located throughout the low-lying area adjacent the Rietvlei Road (Figure 19). There is a dense distribution of quartzite cobbles, which confirm that the old beach/river terrace, underlie the gravel road as well as the pathway leading down to the estuary and boardwalk.

This same cobble beach underlies the property as well, with the cobbles visible on the northern perimeter of the property where the overlying barrier dune reaches its lowest height (Figure 3).



**Figure 12:** Survey by Webley (2022). All the white stars represent quartzite cobbles. Their distribution is restricted to the area north of the white stippled line, with the exception of 009 which is a garden path. The red stars represent the stone features.



**Figure 13:** Stone Feature 1 (left) and stone feature 2 (right). The scale is 20cm in length.

However, in addition to the two stone heaps, it was observed that there are cobbles distributed throughout the area in the undergrowth.



**Figure 14:** Cobbles scattered throughout the area in the undergrowth. Scale ruler: 20 cm.

**Table 3:** Co-ordinates of Archaeological and Geological locations

Site Name	GPS coordinates	Description	Significance
001	S34.024073° E23.387194°	<b>Feature 1:</b> This feature is 1m x 80 cm. It is round in shape. One of the stones on the cairn comprises a piece of Enon conglomerate.	IIIA if the cairn represents a grave; Not archaeological if it is a geological observation
002	S34.024105° E23.387267°	<b>Feature 2:</b> The quartzite cobbles and rocks appear to have collapsed and spread out more, but this feature is also approximately 1 m x 1 m in size.	IIIA if the cairn represents a grave; Not archaeological if it is a geological observation
003	S34.024316° E23.387660°	Quartzite cobbles in the undergrowth and along the fence.	Not archaeological
004	S34.024200° E23.387967°		
005	S34.024615° E23.388493°		
006	S34.024643° E23.388468°		
007	S34.024516° E23.388513°		
008	S34.023962°		

	E23.386560°		
009	S34.025557° E23.387821°		
010	S34.024118° E23.387189°		

## 8.1 Oral History Investigation

The landowner attempted to contact the previous owner to determine the origins of the two stone heaps through oral interviews. This involved contacting the son of the previous owner of the property, who was no longer resident in Plettenberg Bay. Unfortunately, no further information could be obtained. Efforts were also made to talk to the estate agent who had been involved in the sale of the property, but this too was unsuccessful.

## 9. POTENTIAL IMPACTS TO ARCHAEOLOGICAL RESOURCES

Since archaeological resources are non-renewable, it is important that they are identified, and their significance assessed prior to development. The main causes of impacts to archaeology are direct physical disturbance to the material itself and its context. The significance of an archaeological site is highly dependent on its geological and spatial context. Generally, impacts to archaeological sites are most severe during the construction phase although indirect impacts may occur during the operational phase as well.

The dense vegetation has made a comprehensive archaeological survey of area difficult to undertake. This degree of uncertainty also makes it difficult to provide an assessment of the severity of the impacts to archaeological resources.

Only two features of **potential** archaeological significance were recorded by Nilssen (2009) and Webley (2022). The stone features **may** represent graves with Grade IIIA significance. If they are graves, then impacts would be high and irreversible.

However, if the features are piles of rubble related to building/landscaping activities, then the impacts would be low to non-existent.

**Table 4:** Assessment of Archaeological Impacts

Potential impacts on archaeological resources	
Nature and status of impact	Direct, negative
Extent and duration of impact	Local, permanent
Intensity	Low
Probability of occurrence	Low
Degree to which the impact can be reversed	Low
Degree to which the impact may cause irreplaceable loss of resources	High
Cumulative impact prior to mitigation	Unknown
Significance rating of impact prior to mitigation (Low, Medium, Medium-High, High, Very-High)	Unknown
Proposed Mitigation	Implement a 5 m buffer around the two features.
Cumulative impact post mitigation	N/A
Significance rating of impact after mitigation (Low, Medium, Medium-High, High, Very-High)	N/A

The following mitigation measures were assessed:

- It is not possible to determine whether the stone features are graves without archaeological excavations with a Workplan issued by HWC. This would entail a broad public participation process and if human remains are found, there would likely be a requirement for reburial, potentially on site.
- A buffer of 5 m has been incorporated into the Revised Layout for Alternative 1, and this must be implemented. The two stone features must be fenced during earth moving activities (Alternative 1).
- Since it is not clear that the stone features represent burials, an archaeologist must be on site during development and if any human remains are uncovered, work must stop and HWC must be notified. Since the vegetation is impenetrable and a comprehensive archaeological survey is not possible, monitoring of the site during earth moving activities, could address these concerns.

- The 2009 desktop PIA report recommended archaeological monitoring of bulk earthmoving activities by a suitable qualified professional for the occurrence of fossil shells and liaise with the appointed palaeontologist. This requirement could be replaced by the Fossil Finds Protocol.

## 9.1 Cumulative Impacts

There have been few, if any reports of significant archaeological heritage resources along this section of the coastline between Plettenberg Bay and Keurboomstrand. This could be partly due to the changes in the Keurbooms River estuary as well as previous raised beaches. The cumulative impact of the proposed development is considered to be Low.

## 10. SOCIO-ECONOMIC BENEFITS

The development supports applicable developmental policies which promote sustainable, integrated and inclusive housing in the formal and informal markets. The proposed residential development will increase the density in the area, which will ensure the efficient use of the municipal service infrastructure. It is infill development, preventing urban sprawl. The construction of the 17 units will provide short term employment in the Plettenberg Bay area.

## 11. PUBLIC PARTICIPATION

The draft HIA (including the AIA) was submitted to the Bitou Municipality and the registered conservation bodies for comment.

## 12. CONCLUSIONS

To summarize the results of the desktop palaeontological study, Pether (2009) noted that the deeper deposits in the windblown sands “may reveal scattered fossil shell, possible fossil shell concentrations and other features of palaeontological importance”. The fossil shell may include microfossils such as foraminifera and ostracods in calcareous sand and diatoms, pollens and spores in interbedded estuarine muds”. However, these are difficult to identify and predict.

The archaeological survey suggests that the two stone features are located on an old beach terrace of quartzite river cobbles, exposed along the northern section of the property, near the fence line (Figure 2). A section of the “beach terrace” referred to by Pether (2009) appears to be visible under the Rietvlei Road.

- The survey was unable to determine whether the stone features occurred naturally;
- The stone features could have resulted from the excavations of services for the dwelling;
- The stone features could have resulted from drilling for sub surface water, such as at the adjoining property or they could represent clearing of the bush for the pathway which led down to the estuary and which are clearly visible on the 2004 Google Earth images.

It seems unlikely that burials would have been dug into an old, cobbled river terrace which would be difficult to excavate. *However, it is not possible to state categorically that the stone features are not graves.*

## 13. RECOMMENDATIONS

### 13.1 Recommendations - 2009

In his recommendations, Nilssen (2009) proposed full time archaeological monitoring of vegetation clearing, and earthmoving activities should be conducted by a suitably qualified professional. This measure will ensure that potential negative impact on archaeological materials is avoided or minimized. Nilssen (2009) also recommended archaeological excavations of the two stone features.

### 13.2 Recommendations – 2022

A second field visit confirmed that the two stone features are located on an old beach terrace of quartzite river cobbles, exposed along the northern section of the property. A section of this “beach terrace”, described by Pether (2009), is also visible under the Rietvlei Road.



The two stone features can be interpreted in numerous ways, and it is not clear whether they represent graves or not.

It is recommended that proposals are endorsed subject to the following conditions:

- Alternative 1, the preferred alternative, is supported.
- The buffer of 5 m around the stone features, which has been incorporated into the Revised Layout 1, must be implemented. The two stone features must be fenced during the earth moving activities, to protect them from accidental impact.
- An archaeologist must be on site to monitor earth moving activities, particularly those areas around the stone features.
- In view of the possibility of fossil shells (Desktop PIA 2009), the Fossil Finds Protocol must be included in the EMPr.

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. 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.

## **14. REFERENCES**

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DRAFT

# **PALAEONTOLOGICAL IMPACT ASSESSMENT**

## **(DESKTOP SCOPING STUDY)**

### **PROPOSED CONSTRUCTION OF A HOTEL ON GANSE VALLEI 444/38, PLETTENBERG BAY, DISTRICT KNYSNA, WESTERN CAPE**

**By**

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*For the Property Owner*

**Joep van Almenkerk**

c/o Wendy Floyd & Associates  
PO Box 375, Plettenberg Bay, 6600

**12 MAY 2009**

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## SUMMARY

The Keurbooms estuary and its barrier-beach and tidal-inlet system is one of the most studied of such systems on the South Africa coast. The historical changes to the system during the last ~100 years are approximately known, but its earlier history, preserved in the deposits around the margins, is not well studied.

The proposed hotel site is situated on the eastern, younger, seaward part of late Quaternary, conglomeratic “beach terrace” deposits marginal to the Keurbooms estuary (Figure 1). Although the fossil potential is moderate in beach conglomerates, layers and pockets of fossil shell may occur and have previously been noted in the general area.

Full time archaeological monitoring of bulk earthmoving activities by a suitably qualified professional was recommended in the AIA.

It is recommended that said archaeological monitor also watch for the occurrence of fossils and liaise with the appointed palaeontologist on any occurrences and the nature of the deposits (e.g. preservation of carbonate “shell sand” and possible interbedded estuarine muds).

Should fossils finds or geologically significant sections be exposed, the primary mitigation task entails the specialist documentation and sampling of the excavations.

The significance of such samples/documentation involves:

- Significance in the history of sea-level change and coastal evolution.
- Record of changes in faunal communities with time.
- For future radiometric and chemical dating purposes (rates of coastal change).
- Preservation of fossils for future palaeoenvironmental research e.g. stable-isotope palaeo-temperature analysis, palaeo-salinity *etc.*
- Preservation for the application of yet unforeseen investigative techniques.

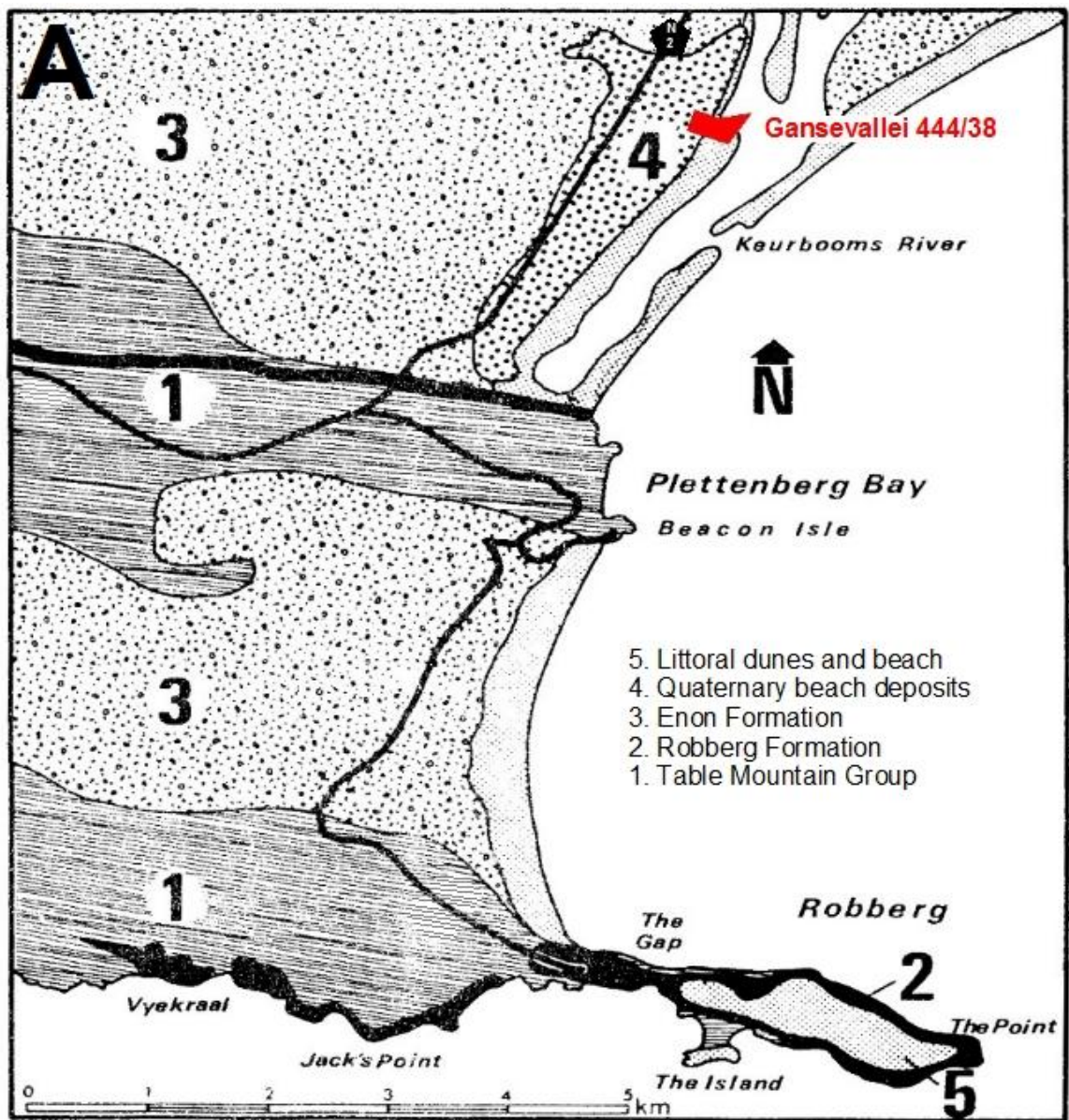


Figure 1. A: Geology (from Rust & Reddering, 1985). B: Aerial view of location (3423AB3 extract, Chief Directorate Surveys & Mapping, Land Affairs, RSA).

## PROJECT DESCRIPTION

This document has been prepared at the request of Mr. Stefan de Kock of Perception Environmental Planning, the environmental management consultant conducting the EIA processes for the proposed hotel development on Ganse Vallei 444 Portion 38, owned by Mr Joep van Almenkerk.

The main purposes of this assessment are to:

- Outline the nature of possible palaeontological heritage resources in the subsurface of the site.
- Suggest the mitigatory actions to be taken during the installation of infrastructure at the site with respect to the occurrence of fossils.

Below are some general points pertaining to palaeontological mitigation.

### Palaeontological Heritage Management

Unlike archaeological mitigation, the sampling or rescue of fossils cannot usually be done prior to the commencement of excavation operations.

Although fossil shells may be exposed in the broader area, in this case the intention is to describe the *in situ*, pristine stratigraphic sections exposed within the excavations for the proposed development and sample the *in situ* fossil content.

These palaeontological interventions thus happen once the EIA process is done, approvals have been obtained and excavations of the development is quite advanced.

The action plans and protocols for palaeontological mitigation must therefore be included in the Environmental Management Plan (EMP) for the developments.

Palaeontological mitigation is a longer-term process and does not impede the project.

On the contrary, the “windows” into the subsurface provided by developments and other excavations, such as made by diamond mining, have been invaluable to the science of fossils and geological history. They provide an opportunity to see the “hidden pages” of the landscape.

In this sense, large holes in the ground can be an asset beyond their economic/material motivation, provided that the information they show is interpreted and appropriately communicated to citizens and visitors (part of the EMP).

## GEOLOGICAL SETTING

Ganse Vallei 444 Ptn 38 is situated on the western bank of the Keurbooms/Bitou estuary, north of Plettenberg Bay town (Figure 1A). A low wetland divides the property, to the east of which are young vegetated dunes and to the west is a low ridge (Figure 1B). The existing dwelling is on the crest of the ridge. The proposed hotel site is on the western flank of the ridge where the elevations are approximately 14-18 m asl. (above sea level).

The basement geology of the area is lower **Table Mountain Group**, mainly quartzites, of early Ordovician age (490-470 Ma) (Ma = Mega-annum – a million years). These are deposits of an ancient storm-dominated, tidally-influenced marine shelf (Thamm & Johnson, 2006). Rare trace fossils (spoor-fossiele) may occur.

The Table Mountain Group in this area was extensively disrupted by faulting during the breakup of the super-continent Gondwana (late Jurassic to early Cretaceous, 160-140 Ma), forming numerous steep-sided basins into which its erosional debris was deposited as talus, forming the coarse, conglomeratic **Enon Formation** of boulders, cobbles and pebbles (Shone, 2006). Fossils are very scarce and only bone and wood fragments have been found. There are many natural exposures in the area and the Enon conglomerates are extensively quarried for crushed aggregate.

On the Robberg Peninsula is the **Robberg Formation** where the Enon coarse talus is seen interfingering with the deposits of the early coastline, where it was transformed into ancient beach conglomerates. Fossiliferous marine sandstones also occur, as well as estuarine mudrocks (Shone, 2006).

The subsequent geological history of the area of the last ~100 million years (m.y.) is mainly evident in the geomorphology of the coast; the “coastal platforms” or “marine benches”, seen as the flat areas on the summits above the valleys. These “steps” down to the present coast are nicely displayed in “Google Earth”, in tilted view with a large vertical exaggeration (Figure 2). The higher platforms inland are the

oldest, while the lower levels were planed by younger sea levels. The platforms do not represent the actual sea-levels, as slow uplift of the margin has taken place and raised them to their current height.

These marine platform features generally have a cover of old dunes or coversands, but in places underlying marine deposits have been exposed. In brief, the prominent high platform +200-240 m asl may be of Eocene age (55-35 Ma), but it is probably a composite feature produced over several sea highstands, perhaps including much older, late Cretaceous sea levels between 100-65 Ma. Actual marine deposits have been recognized in the Plettenberg bay area, relating to sea levels reaching ~100, ~60 and ~ 30 m asl. (Butzer & Helgren, 1972). These are apparently decalcified, the shell fossils that would have enabled the dating of them having dissolved (or they have not been noticed or discovered). Notwithstanding, these maxima are very similar to those seen on the West Coast, where they are dated by fossils to ~16-15 Ma (late Early Miocene), ~5-4 Ma (early Pliocene) and 3.5-3.0 Ma (mid-Pliocene), respectively (Pether *et al.*, 2000).

After ~3 Ma the Earth went into "Ice House" mode (the Quaternary Period) and major ice caps formed in the polar regions, subtracting water from the oceans. Sea levels fluctuated at positions mainly below present and coastal rivers eroded their valleys to deeper levels. However, there were brief intervals of global warming, of which the present time is an example, when sea levels were similar to or a few metres above the present. These are the Quaternary (or Pleistocene) "raised beaches" found at low elevations (<15 m asl.) around the coast, where they are exposed in cliffs beneath dune rocks or on top of low marine platforms fringing the coast.

Notably, an extensive area of Quaternary beach deposits, forming a beach terrace, has been mapped on the west flank of the Keurbooms/Bitou estuary (Figure 1A).

## **ASSESSMENT: EXPECTED GEOLOGY/PALAEONTOLOGY**

The proposed hotel site is situated on the eastern, seaward part of the aforementioned "beach terrace" deposits (Figure 1B).

To the north on the "The Jetty" property, beach conglomerates crop out along the edge of this body in the vicinity of the jetty and in a small quarry near the N2. A larger quarry, evident in the aerial photograph, is on the west side of the N2 opposite the Ganse Vallei Ptn 38 turnoff. It is not known to the author whether these exposures are fossiliferous, or if they have ever been closely inspected for fossil content. Notwithstanding, fossiliferous (shelly) beach deposits of supposed Last Interglacial age are known from the general area (Reddering, pers. comm.).

It is clear from the AIA report (Nilssen, 2009) that cobbles have been unearthed on the property from beneath a relatively thin cover of dune and/or sandsheet deposits. Two small cairns of unearthed cobbles may be gravesites and several dumps of cobbles associated with recent construction activities were reported.

It is expected that fossil shells and bones in the uppermost windblown sands will very likely be in an archaeological context *i.e.* due to man. The upper parts of the developments may intersect human burials. Occurrences of such archaeological material are not within this brief and must be dealt with by an accredited archaeologist.

The deeper deposits may reveal scattered fossil shell, possible fossil shell concentrations and other features of palaeontological and scientific importance. The fossil content very likely also includes invisible microfossils, such as foraminifera and ostracods in calcareous sand and diatoms, pollen and spores in interbedded estuarine muds.

In addition to shells, scattered bones may occur in the beach deposits, but are much more rare. For example, bones of whales, dolphins, seals, seabirds *etc.* occur in marine deposits. Some of these end up in adjacent dune sands, where terrestrial animals also occur, *e.g.* antelopes, hyaena, jackal, ostrich.

## **IMPACT ASSESSMENT**

### **Significance**

Many scientific opportunities provided by the excavations made this area in the course of coastal developments and quarrying have been missed, as an ongoing scientific monitoring presence has never been funded. Now that the fossil/scientific record is included in EIAs as a heritage resource, the circumstance arises to co-operatively remedy the missed opportunities within a more formal framework. Thus, opportunities to examine the subsurface geological and fossil record in the area continue to be vital. The developments have potential as a record of higher sea-levels during the Quaternary Period.

Specifically, the Keurbooms estuary and its barrier-beach and tidal-inlet system is one of the most studied of such systems on the South Africa coast. The historical changes to the system during the last ~100 years are approximately known, but its earlier history, preserved in the deposits around the margins, is not well studied.

- In summary, the significance of such samples/documentation involves:
- Significance in the history of sea-level change and coastal evolution.
- Record of changes in faunal communities with time.
- For future radiometric and chemical dating purposes (rates of coastal change).
- Preservation of fossils for future palaeo-oceanographic research e.g. stable isotope/palaeotemperature analysis *etc.*
- Preservation for the application of yet unforeseen investigative techniques.
- Rescuing of fossil bones is very important. These may not necessarily represent species that we would expect nowadays. Modern analytical techniques such as stable isotopic analyses can reveal indications of diets and environmental conditions of the past.

There is a significance to fossils beyond their conventional academic/scientific importance that is more firmly in the realm of cultural aesthetics. Fossils are part of the physical strata of the landscape and inform the appreciation of its space-time depth and its biota, living and extinct. Such realizations are inspired by encounters with fossils. Ultimately this heritage resource must be rendered known and accessible to the wider community via educational programmes emanating from e.g. museums, sponsorship, NGOs. The first priority, however, is to rescue fossils and attendant information that would otherwise be lost.

## **Nature of the Impact**

### *Extents*

Initially, the physical extent of impacts on potential palaeontological resources relates directly to the extents of subsurface disturbance during construction.

### *Duration*

According with the above, the initial duration of the impact is shorter term (< year) and primarily related to the period over which infrastructural excavations are made. This is the “time window” for mitigation.

In the longer term, the development “sterilizes” the palaeontological resource potential within its extents, as the subsurface is “sealed” beneath roads, buildings and urban gardens.

### *Intensity*

The impact of coastal development/construction on fossil resources is high in the absence of mitigation. This is because fossils are rare objects, often preserved due to unusual circumstances. This is particularly applicable to vertebrate fossils (bones), which tend to be sporadically preserved and have high value w.r.t. palaeoecological and biostratigraphic (dating) information. Such fossils are non-renewable resources and loss of the opportunity to recover them and their contexts when exposed at a particular site is irreversible.

### *Probability*

The likelihood of impact is probable. Although beach conglomerates are not generally very fossiliferous, it is quite possible that fossiliferous material could occur. As mentioned, the scarcity of fossils makes for added importance.

### *Confidence*

The level of confidence of the nature and degree of impact is medium to high. Existing information has been assessed and the author has made observations in the area.

### *Status of the impact*

The status of the potential impact for palaeontology is not neutral. Fossils will probably be lost in the absence of management actions to mitigate such loss.

There remains a medium to high risk of valuable fossils being lost in spite of management actions to mitigate such loss. Machinery involved in excavation may damage or destroy fossils, or they may be hidden in “spoil” of excavated material.



From the point of view that the “windows” into the coastal plain depository, that provide access to fossils, would not exist without excavations being made, the impact is positive for palaeontology. However, the development renders the subsurface fossils inaccessible indefinitely into the future.

## **RECOMMENDED MANAGEMENT - MITIGATION**

It is not possible to predict the buried fossil content of an area other than in general terms. Fossils bones are sparsely scattered in coastal deposits and much depends on spotting them as they are uncovered during digging *i.e.* by monitoring excavations. In contrast, shelly layers are usually fairly extensive and normally are exposed in the sides of the finished excavation, when they can be documented and sampled easily during primary fieldwork.

For the future developments, it is suggested that an acceptable degree of mitigation, entailing both monitoring and a detailed inspection of excavations (primary fieldwork), be carried out. The monitoring of excavations whilst they are being made is aimed mainly at recovering the sporadic, but important fossils. The primary fieldwork is to document the exposures and establish their stratigraphic and palaeoenvironmental contexts, with sampling of fossiliferous beds. A management framework for the mitigation process is proposed.

### **Monitoring**

The monitoring of excavations for fossils takes place over the period they are being dug. It is an exercise in optimism, with the object of spotting the more rare fossils, such as bones, as they are turned up. This depends on a regular presence.

Full time archaeological monitoring of bulk earthmoving activities by a suitably qualified professional was recommended in the AIA.

It is recommended that said archaeological monitor also watch for the occurrence of fossils and liaise with the appointed palaeontologist on any occurrences and the nature of the deposits (*e.g.* preservation of carbonate “shell sand” and muds).

### **Primary mitigation**

Should fossils finds or geologically significant sections be exposed, the primary mitigation task entails the specialist documentation and sampling of the excavations.

This activity should coincide with the time of maximum exposure of the faces of the excavations, for best cost-effectiveness. The main aim is to coincide periods of Primary Mitigation fieldwork with times when best exposure of the stratigraphic section is available, preferably to the maximum planned depth.

When the excavations are near or at completion:

The excavation faces must be inspected for fossil content.

Key vertical sections representative of the exposures must be identified.

These must be described in detail sedimentologically (logged), photographed and sampled.

Representative samples of fossils must be collected. In the case of shelly beds, bulk samples should be taken. If material is delicate/poorly-preserved, it should be removed within blocks of the enclosing sediment, reinforced if required by encasement.

The mitigation process makes some logistical demands such as liaison protocols with a suitably-placed persons with respect to scheduled excavation planning and the progress being made.

## **THE REPORT**

At the end of primary mitigation a detailed report will be submitted. This report is in the public domain and copies of the report must be deposited at the IZIKO S.A. Museum and Heritage Resources Western Cape. It must fulfil the reporting standards and data requirements of these bodies.

The report will be in standard scientific format, basically:

A summary/abstract.

Introduction.

Previous work/context.

Observations (incl. graphic sections, images).

Palaeontology.

Interpretation.

Concluding summary.  
References.  
Appendices

A prescribed data requirement is adequate 3D spatial referencing. This will require the assistance of the surveyor w.r.t. coordinates and base maps, to plot the locations of finds during monitoring, the measured sections, samples and other observations. Preferably, this would be in georeferenced digital format e.g. a CAD dxf file or ESRI GIS shape files.

The draft report may be reviewed by the client, or externally, before submission of the Final Report.

## **ADDITIONAL NOTES**

### **Enhancement**

The client might desire a display/exhibition of findings and features: out of a combination of interest, public-mindedness and to demonstrate diligence w.r.t. heritage/science resources. This would have to be at a location and under conditions approved under the auspices of the IZIKO S.A. Museum and the Heritage Resources Authority Western Cape (HWC).

### **Application for a Palaeontological Permit from Heritage Western Cape**

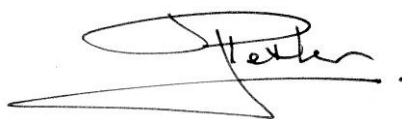
Should fossils be found, it is required to obtain a palaeontological permit from HWC in order to carry out the work. The application for this needs details of the registered owners of the sites, their permission and a site-plan map.

All samples of fossils and sediments must be deposited at a SAHRA-approved institution.

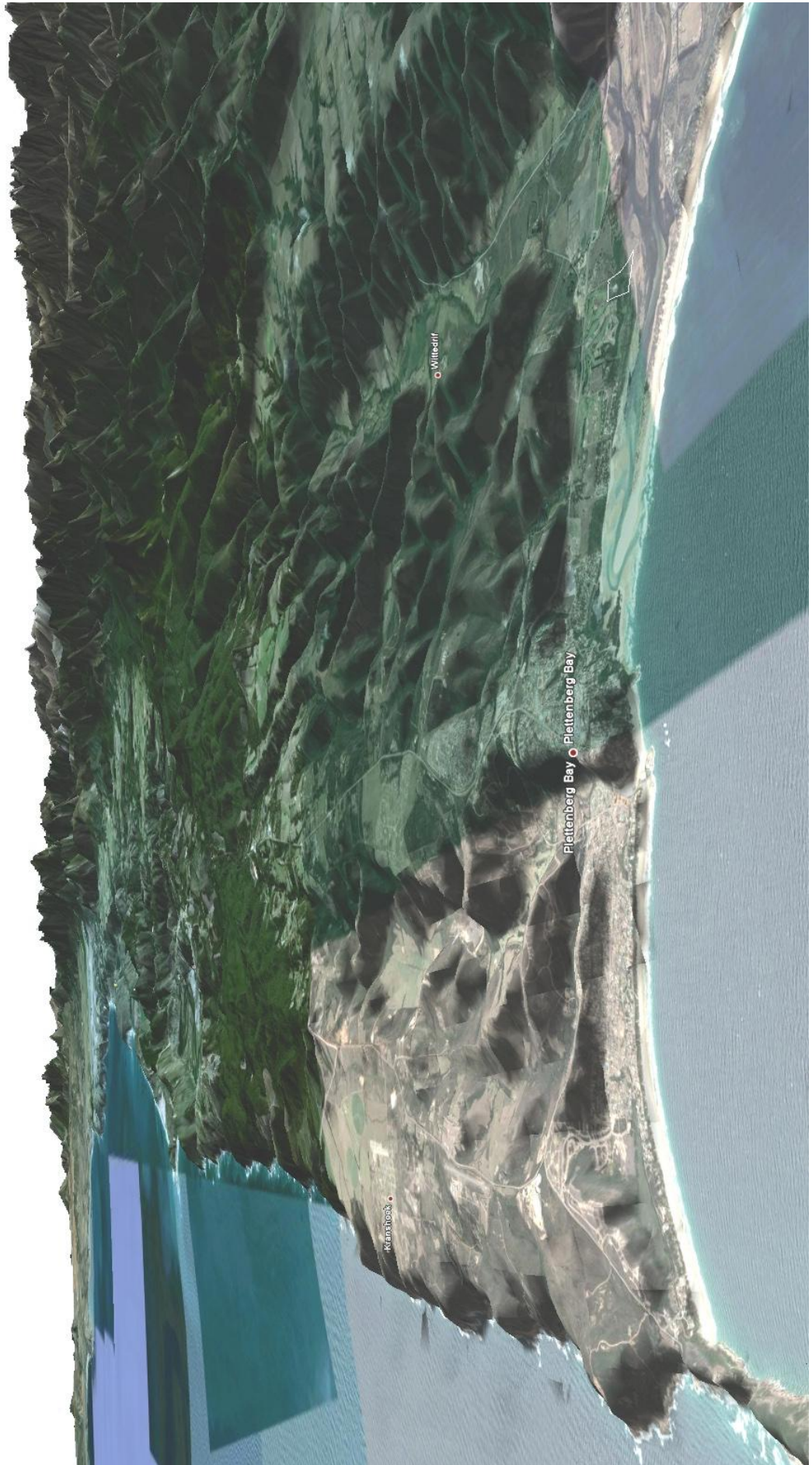
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John Pether  
12 May 2009



**Figure 2. Google Earth oblique view of coastal platform, Plettenberg Bay area.**



Stefan de Kock &lt;perceptionplanning@gmail.com&gt;

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## Public Consultation Process: Draft Integrated Heritage Impact Assessment: Gansevallei 444/38, Plettenberg Bay

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Perception Planning &lt;perceptionplanning@gmail.com&gt;

Thu, Feb 9, 2023 at 6:12 AM

To: Maruis Buskes &lt;mbuskes@plett.gov.za&gt;, Dr Natie De Swardt &lt;natiedes@gmail.com&gt;

Cc: Mariska Nicholson &lt;mariska@cape-eaprac.co.za&gt;

Bcc: Nils van Zyl &lt;nils@intergreen.co.za&gt;, Christopher van Zyl &lt;christopher@intergreen.co.za&gt;

Attention:

Bitou Municipality: Planning &amp; Building Control (Marius Buskes)

Simon van der Stel Foundation - Southern Cape (Dr. Natie de Swardt)

Dear Sir/ Madam,

### **NOTIFICATION OF PUBLIC CONSULTATION PROCESS WITH RELATION TO THE DRAFT INTEGRATED HERITAGE IMPACT ASSESSMENT IN TERMS OF SECTION 38 OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999):**

### **PROPOSED DEVELOPMENT OF GANSE VALLEI 444/38 (PLETTENBERG BAY), KNYSNA DISTRICT AND BITOU MUNICIPALITY (HWC CASE NO. 22101907AM1019E)**

1.) In accordance with Heritage Western Cape's current requirements pertaining to public consultation you are hereby informed that the above process is currently underway. You are therefore formally invited to submit to us heritage-related comments/ objections with relation to the application.

2.) A digital copy of the Draft Integrated HIA is attached hereto. The full report, together with all annexures may also be obtained by accessing the GoogleDrive link below, or alternatively, directly from us upon request.

[https://drive.google.com/drive/folders/1EyYTUg3NpxW59G9p7sWpVzPUYJfJaBfE?usp=share\\_link](https://drive.google.com/drive/folders/1EyYTUg3NpxW59G9p7sWpVzPUYJfJaBfE?usp=share_link)

3.) Please inform us immediately should not you not be able to access the information via the above link so we can assist accordingly.

4.) Written heritage-related comments and/or objections must please be submitted to us no later than **13th March 2023**.

Kind regards,

Stéfan

**STEFAN DE KOCK**

- 7 Imelda Court, 103 Meade Street, George, 6529
- PO Box 9995, George, 6530
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**Draft Integrated HIA - Gansevallei 444\_38 - February 2023.pdf**  
3899K

**INTEGRATED HERITAGE IMPACT ASSESSMENT IN TERMS OF SECTION 38 OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999): PROPOSED RESIDENTIAL DEVELOPMENT ON A PORTION OF GANSE VALLEI 444/38 (PLETTENBERG BAY) KNYSNA DISTRICT AND BITOU MUNICIPALITY**

Notice is hereby given that a Heritage Impact Assessment process, as required by Heritage Western Cape in terms of Section 38 of the National Heritage Resources Act, 1999 (Act 25 of 1999), is currently underway as part of a NEMA Environmental Process in respect of the proposed development.

Interested and affected parties may obtain electronic copies of the Draft Integrated Heritage Impact Assessment together with all annexures directly from the heritage practitioners Perception Planning via email: Stéfan de Kock ([perceptionplanning@gmail.com](mailto:perceptionplanning@gmail.com)).

Heritage-related comments should be submitted in writing no later than **13th March 2023** to Stéfan de Kock ([perceptionplanning@gmail.com](mailto:perceptionplanning@gmail.com)), or Perception Planning, PO Box 9995, George, 6530. Comments that do not reach us by the closing date, or that are not heritage-related, may be disregarded.

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**GEÏNTEGREERDE ERFENISIMPAKSTUDIE IN TERMS VAN ARTIKEL 38 VAN DIE ERFENISHULPBRONNE BEWARINGSWET, 1999 (WET 25 VAN 1999): VOORGESTELDE RESIDENSIËLE ONTWIKKELING OP 'N GEDEELTE VAN GANSE VALLEI 444/38 (PLETTENBERGBAAI), KNYSNA DISTRIK EN BITOU MUNISIPALITEIT**

Kennis word hiermee gegee dat 'n Erfenisimpakstudieproses, soos vereis deur Erfenis Wes-Kaap ingevolge Artikel 38 van die Wet op Nasionale Erfenishulpbronne Wet, 1999 (Wet 25 van 1999) met betrekking tot bogenoemde ontwikkeling, tans onderweg is as deel van 'n NEMA Omgewingsproses.

Belanghebbende persone en instansies kan elektroniese afskrifte van die Konsep Erfenisimpakstudie tesame met alle aanhangsels verkry deur direk in verbinding te tree met die erfeniskonsultante (Perception Planning); Stefan de Kock ([perceptionplanning@gmail.com](mailto:perceptionplanning@gmail.com)).

Enige skriftelike erfenis-verwante kommentaar moet teen **13 Maart 2023** gestuur word na Stéfan de Kock ([perceptionplanning@gmail.com](mailto:perceptionplanning@gmail.com)), of Perception Planning, Posbus 9995, George, 6530. Kommentare wat laat is of nie spesifiek erfenis-verwant is nie, mag buite rekening gelaat word.

Knysna Plett Herald - 09/02/2023

## INTEGRATED HERITAGE IMPACT ASSESSMENT IN TERMS OF SECTION 38 OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999): PROPOSED RESIDENTIAL DEVELOPMENT ON A PORTION OF GANSE VALLEI 444/38 (PLETTENBERG BAY) KNYSNA DISTRICT AND BITOU MUNICIPALITY

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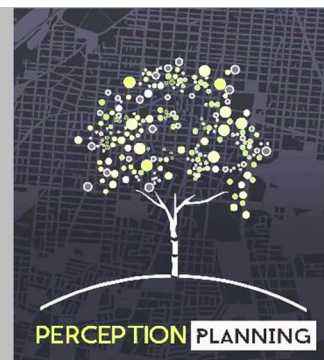
**STÉFAN DE KOCK**  
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Cell: 082 568 4719

Fax: 086 510 8357

E-mail: [perceptionplanning@gmail.com](mailto:perceptionplanning@gmail.com)

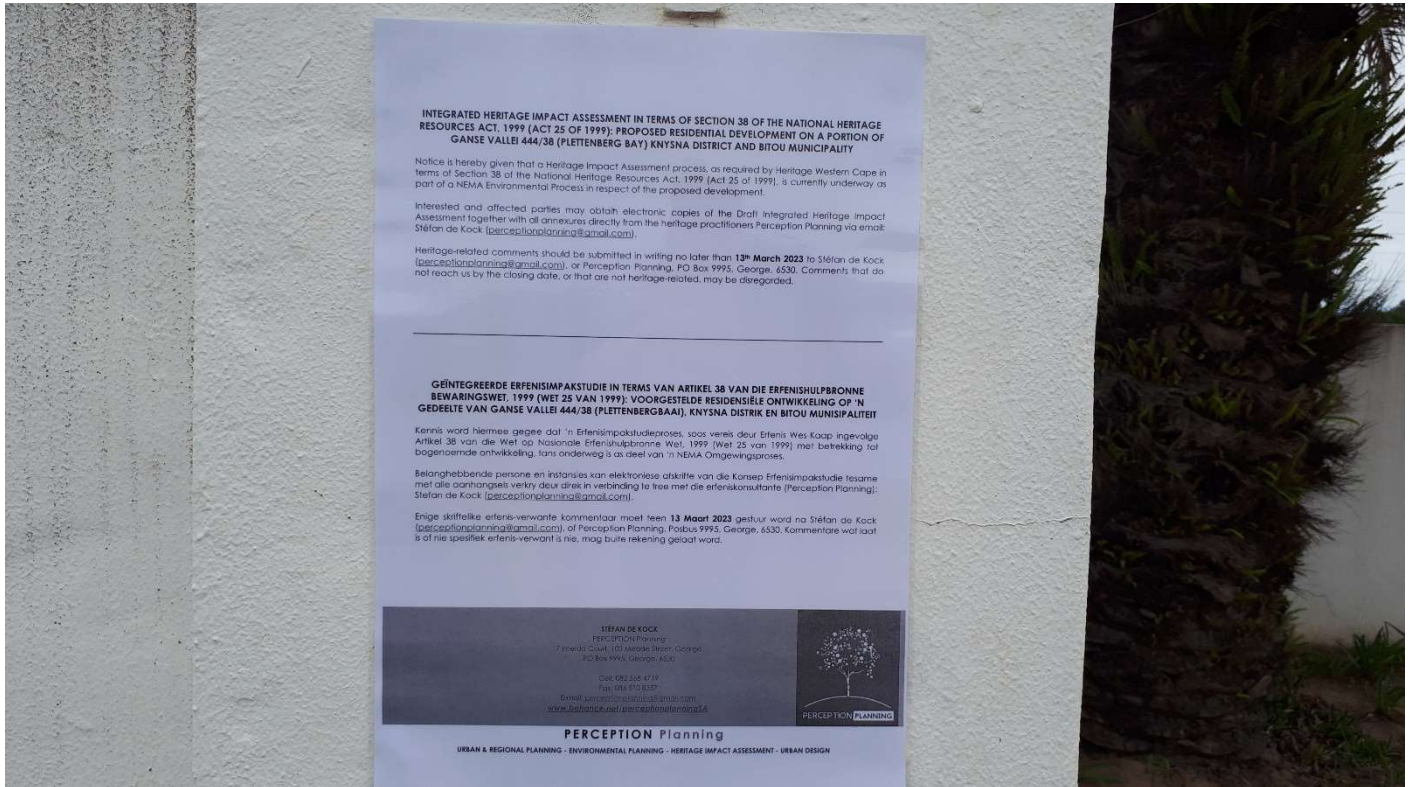
[www.behance.net/perceptionplanningSA](http://www.behance.net/perceptionplanningSA)



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## PHOTOGRAPHS OF SITE NOTICE DISPLAYED FOR DURATION OF PUBLIC CONSULTATION PHASE





Stefan de Kock <perceptionplanning@gmail.com>

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## Public Consultation Process: Draft Integrated Heritage Impact Assessment: Gansevallei 444/38, Plettenberg Bay

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Marius Buskes <mbuskes@plett.gov.za>  
To: Perception Planning <perceptionplanning@gmail.com>

Thu, Feb 9, 2023 at 11:16 AM

Received Thanks Stefan.

Kind Regards,

Marius Buskes

Pr.Pln A/2531/2017

**TOWN PLANNER**

**Bitou Municipality**



Bitou Municipality

[Quoted text hidden]