

# Heritage Statement for an Environmental Authorization or for a Part Two Amendment of an Environmental Authorisation as Required by the 2014 EIA Regulations

**Proposed Residential Development on a Portion of Erf 155,  
Keurboomstrand, Plettenberg Bay, Western Cape Province**

prepared for

**Bluepebble Sustainability Solutions**, C/O Mr Jonathan Kingwill, Postnet Suite 41,  
Private Bag X31, Knysna, 6570, E: [jonathan@bluepebble.biz](mailto:jonathan@bluepebble.biz) on behalf of the  
applicant Ferpa (Pty) Ltd

prepared by



Dr. Peter Nilssen, PO Box 2635, Mossel Bay, 6500  
044 690 4359 | 082 783 5896 | [peter@carm.co.za](mailto:peter@carm.co.za)

28 October 2020

<b>NEMA requirements for Specialist Reports</b>		
<b>Appendix 6</b>	<b>Specialist Report content as required by the NEMA 2014 EIA Regulations, as amended</b>	<b>Section</b>
1 (1)(a)	(i) the specialist who prepared the report; and (ii) the expertise of that specialist to compile a specialist report including a curriculum vitae;	Title page & Section 1; as well as the accompanying CV
(b)	a declaration that the specialist is independent in a form as may be specified by the competent authority;	Section 1
(c)	an indication of the scope of, and the purpose for which, the report was prepared;	Section 2
(cA)	an indication of the quality and age of the base data used for the specialist report;	2020
(cB)	a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Sections 2, 3 & 4
(d)	the duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment;	October 2020 - NA
(e)	a description of the methodology adopted in preparing the report or carrying out the specialised process, inclusive of equipment and modelling used;	Section 3
(f)	details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 4 - NA
(g)	an identification of any areas to be avoided, including buffers;	NA
(h)	a map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	NA
(i)	a description of any assumptions made and any uncertainties or gaps in knowledge;	NA
(j)	a description of the findings and potential implications of such findings on the impact of the proposed activity, or activities;	Section 4
(k)	any mitigation measures for inclusion in the EMPr;	Section 4
(l)	any conditions for inclusion in the environmental authorisation;	NA
(m)	any monitoring requirements for inclusion in the EMPr or environmental authorisation;	NA
(n)	a reasoned opinion- (i) whether the proposed activity or portions thereof should be authorised; and (iA) regarding the acceptability of the proposed activity or activities; and (ii) if the opinion is that the proposed activity or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan;	Section 4
(o)	a description of any consultation process that was undertaken during the course of preparing the specialist report;	NA
(p)	a summary and copies of any comments received during any consultation process and where applicable all responses thereto; and	NA
(q)	any other information requested by the competent authority.	NA
2	Where a government notice gazetted by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	NA

## 1. Name, Expertise and Declaration

I, Peter Nilssen (PhD in archaeology, University of Cape Town 2000), herewith confirm that I am a Professional member - in good standing - of the Association of Southern African Professional Archaeologists (ASAPA), including the Cultural Resource Management section of the same association since 1989 (ASAPA professional member # 097). I am an accredited Principal Investigator for archaeozoology (specialist analysis), coastal, shell midden and Stone Age archaeology; Field Director for Colonial Period archaeology; and Field Supervisor for Iron Age archaeology and Rock Art. I have worked as a professional archaeologist in Cultural Resource Management since 1989 and have completed more than 200 heritage-related impact assessments and mitigation projects that were approved by provincial and national heritage authorities. My CV accompanies this report.

As the appointed independent specialist (archaeologist) for this project hereby declare that I:

- act as an independent specialist 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 offence in terms of regulation 48 of GN No. R. 982.



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Signature of the specialist:

Name of company: Dr Peter Nilssen

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**Professional Archaeologist and Specialist Heritage Practitioner**

Date: **27 October 2020**

## **2. Introduction**

Mr Jonathan Kingwill of Bluepebble is undertaking the environmental process for the proposed development on a portion of Erf 155, Keurboomstrand, Plettenberg Bay (Figure 1). The site is situated approximately 10km north-east of Plettenberg Bay in the Western Cape Province. Since the proposed site for development is less than 0.5 ha in extent and since the development does not activate any of the triggers relating to the National Heritage Resources Act (Act 25 of 1999), a Notification of Intent to Develop is not being submitted to Heritage Western Cape at this time. Nevertheless, from an archaeological and cultural heritage theme perspective, the DEFF Screening Tool indicates that the site is of High sensitivity due to it falling within the coastal belt, it being within 500m of a heritage site and it being within 1km of a protected area (Kingwill 2020). Consequently, Mr Kingwill appointed this author to conduct a site inspection with the purpose of providing inputs concerning the heritage sensitivity of the affected portion of the property.

While the development plans are currently conceptual and awaiting further inputs during this iterative part of the development process, the residential development will be restricted to a portion of the eastern extent of Erf 155 as shown in Figure 2. Vehicular access to the site will be through the Public Space of Erf 391.

The purpose of the study reported here is to determine whether any archaeological or tangible heritage resources occur on the surface of exposed sediments, to assess the sensitivity of archaeological resources if present in the affected area, to determine the potential impacts on such resources if present, and to avoid and/or minimize such impacts by means of management and/or mitigation measures. Note that the study presented here considered archaeological materials of prehistoric and historic origin. Overall, this study assesses the heritage sensitivity of the affected property in order to raise any potential issues or red flags and to recommend the way forward.

## **3. Site Inspection**

The site was readily accessed by taking the Keurboomstrand turnoff from the N2 road and by following the PO394 road and Main Street that border the southern and northern extents of the development site (Erf 155) and access road to the development site (Erf 391). The inspection was conducted independently and on foot on 21 October 2020. Walk tracks were fixed with a hand held Garmin X30 GPS (map datum WGS84) unit to record the search area (Figure 3, gpx tracking file is available from author). Digital audio notes, video and a comprehensive, high quality digital photographic record were made with a Nikon Coolpix AW130 camera. Photo localities and directions of views were fixed by the camera's on-board GPS and compass respectively, which are indicated in photographs with data stamps (Plates 1 through 5). Note that some of the elevation information on the photo data stamps are incorrect. All coordinate, photographic and video data are available on request.

The affected area is vegetated with coastal thicket, scrub and bush and therefore some parts were difficult to access on foot and ground surfaces are commonly strewn with leaf and vegetation litter. Nevertheless, sufficient ground surfaces, disturbed areas and exposed sediments were open for archaeological inspection for the purpose of this basic assessment.

Visible geological sediments included variable thickness of topsoil underlain by shale and water worn cobble from broken up conglomerate of possible Enon origin. Apart from

existing development activities, disturbances and modern rubbish on Erf 391, there is no evidence of historic or prehistoric occupation of Erf 391 or Erf 155. Existing developments include a water reservoir, pipelines, levelling and trenching for pipelines, small excavations or disturbances and a small electrical “sub-station”. The litter on site is mostly on Erf 391 and includes plastic, glass, piping, a vehicle tyre, and so on. No refuse of historic or prehistoric interest or significance was seen on site. Examples of the affected environment are shown in Plates 1 through 5.

#### 4. Conclusions & Recommendations

Although the DEFF Screening Tool rates the site of High sensitivity from an archaeological and cultural heritage perspective, there is no evidence of historic or prehistoric occupation of the site with the exception of the existing modern development activities mentioned above. Consequently, the site is regarded to be of low to negligible sensitivity from an archaeological and cultural heritage perspective. Even though the well known archaeological and Provincial Heritage Site of Matjes River Rock Shelter occurs in the wider area (<https://sahris.sahra.org.za/>), it will not be impacted in any way by development on Erven 155 and 391.

Because the site is visible from the coastal road - although it is not a known tourist route as such -, development on Erf 155 will have some visual impact on the aesthetics of the area as seen from the east. This, however, is not relevant to the archaeological or cultural heritage themes as there are no significant heritage resources within the immediate surroundings of the affected property. The built environment surrounding Erf 155 is of a modern “coastal holiday village” theme and does not have an architectural style of any known heritage significance. Many residential developments including a large modern structure immediately south of Erf 155 are of a mixed and often elaborate modern design (Plate 2, bottom left). The visual impact of the proposed development on Erf 155 will be dealt with under a separate study.

Because shale – a geological sediment with fossil bearing potential - is present on Erf 155 and Erf 391, a quick search was conducted on the SAHRA website. According to the SAHRIS palaeontological sensitivity map, Erven 155 and 391 fall within a green zone, which is of moderate sensitivity, requiring a desktop Palaeontological Impact Assessment (PIA) study (<https://sahris.sahra.org.za/map/palaeo>). I recommend Dr John Almond for this study, who can suggest other professional palaeontologists in the event that he is not available.

Apart from the above-mentioned recommendations concerning aesthetic and palaeontological resources, there are no further archaeological or cultural heritage concerns or objections to the proposed residential development on Erf 155.

Overall, and based on the findings of this study, it is recommended that:

- a visual impact assessment, not specific to archaeological or heritage resources, will be facilitated by Mr Kingwill,
- a desktop PIA study is required according to the SAHRIS palaeontological sensitivity map, and
- if any human remains or 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.

## **Reference**

Kingwill, J. (July 2020) SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION OR FOR A PART TWO AMENDMENT OF AN ENVIRONMENTAL AUTHORISATION AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED DEVELOPMENT FOOTPRINT ENVIRONMENTAL SENSITIVITY

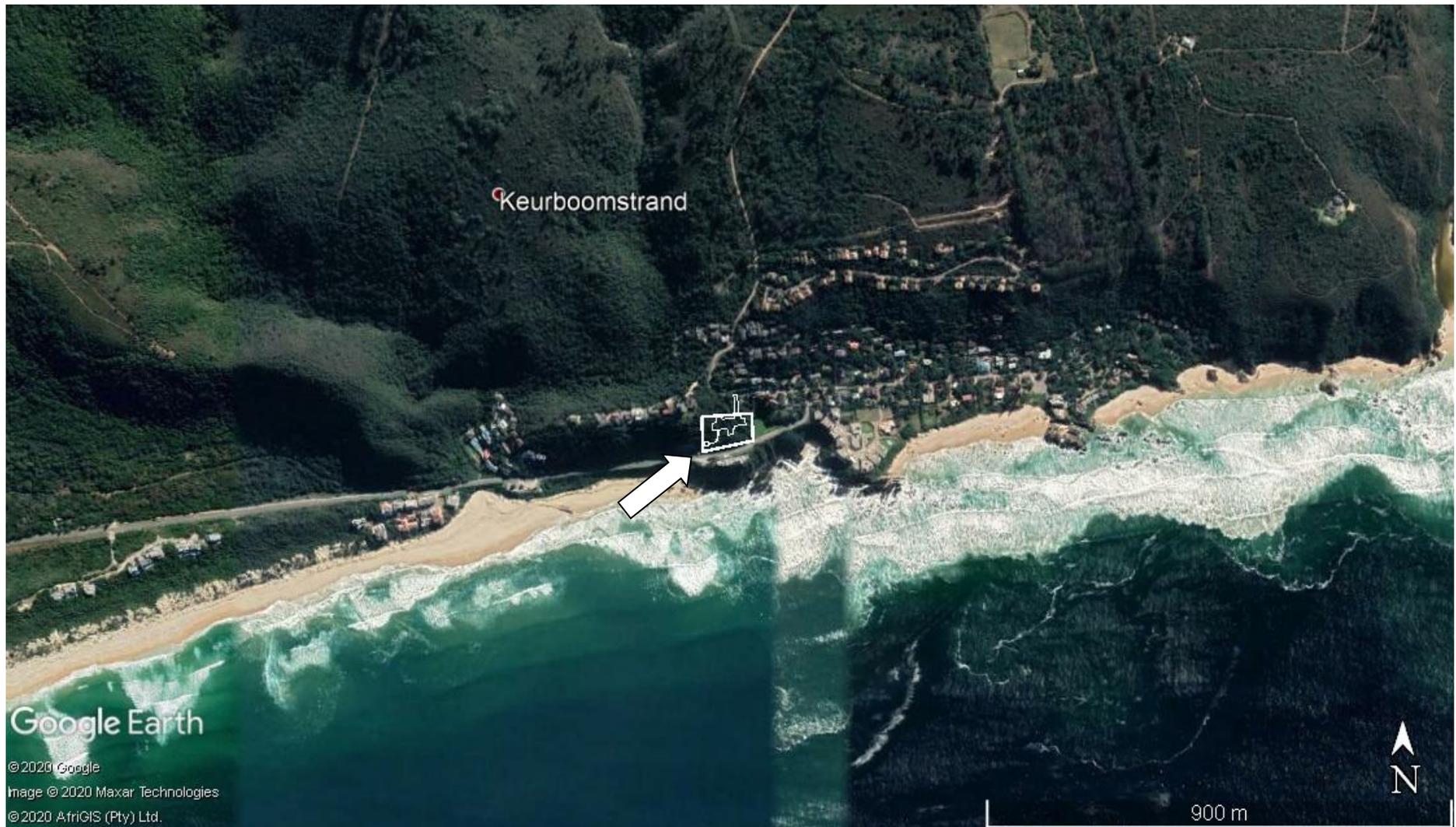


Figure 1. General location of Erf 155, Keurboomstrand, located approximately 10km north-east of Plettenberg Bay, Western Cape Province. Courtesy of Google Earth 2020.

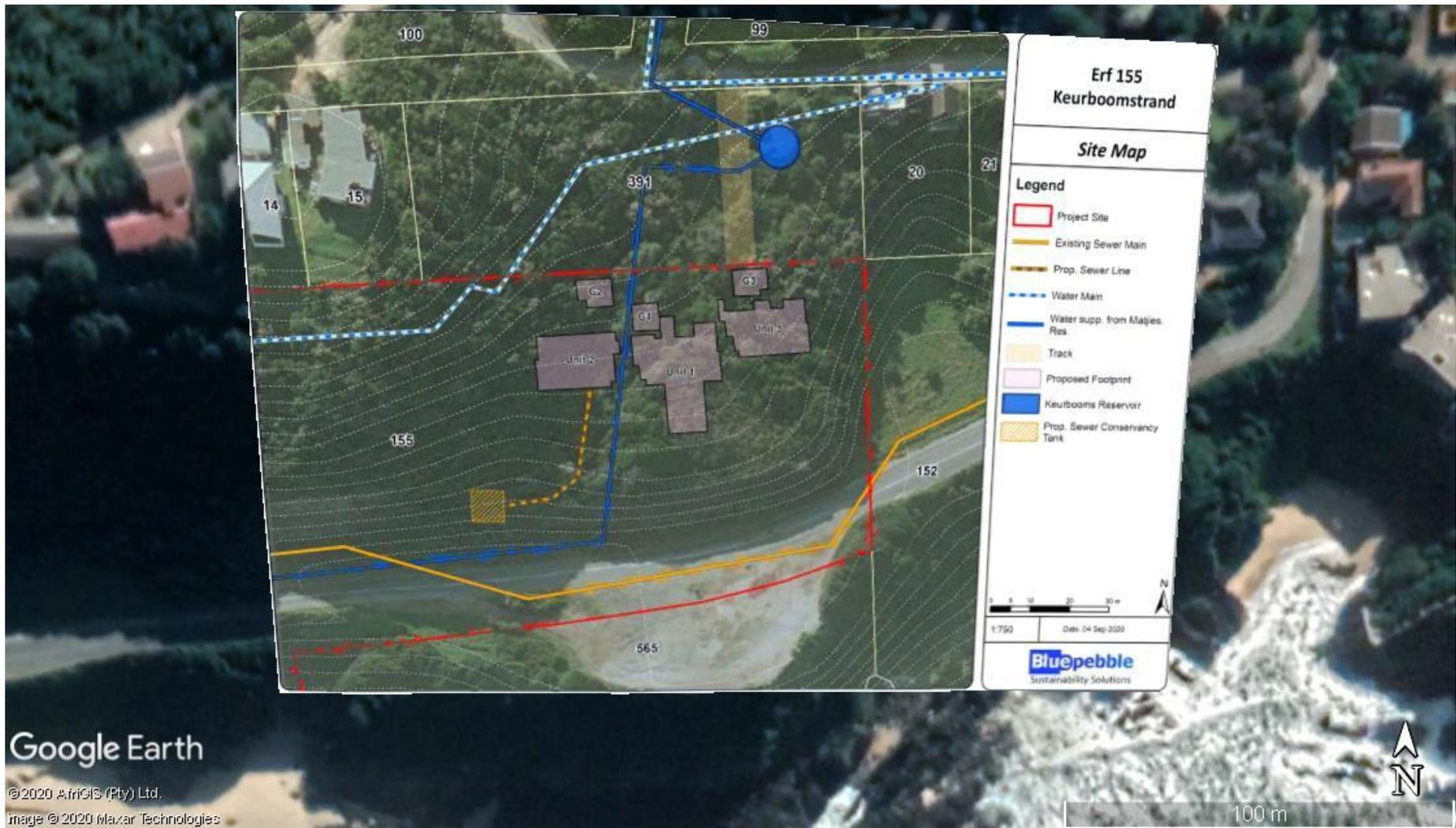


Figure 2. Conceptual site development plan overlaid on the eastern extent of Erf 155 and Erf 391, Keurboomstrand. Courtesy of Bluepebble (Mr Jonathan Kingwill) and Google Earth 2020.

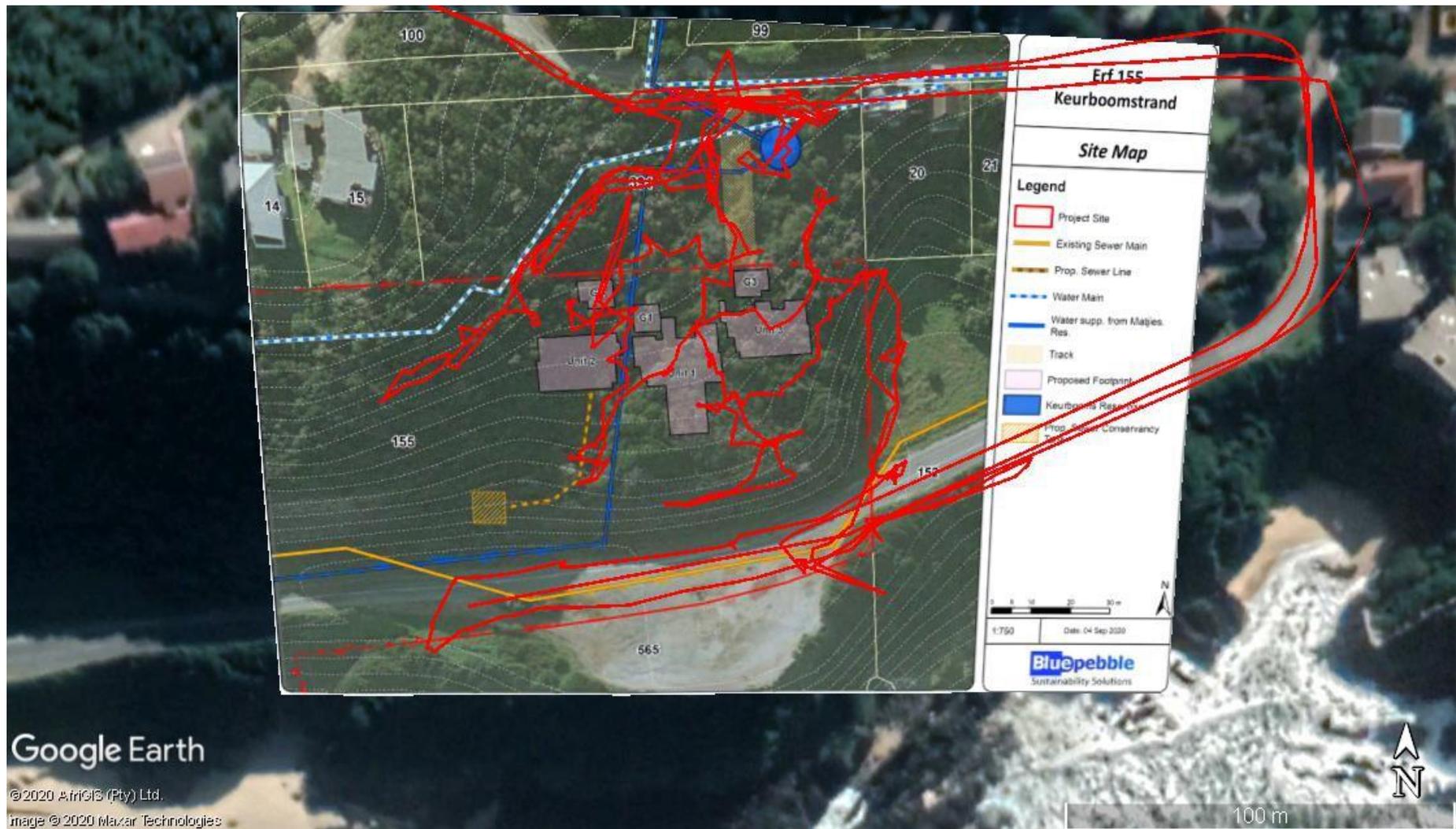


Figure 2. GPS fixed tracks (red lines) of the site inspection overlaid on the conceptual site development plan for the eastern extent of Erf 155 and Erf 391, Keurboomstrand. Courtesy of Bluepebble (Mr Jonathan Kingwill) and Google Earth 2020.



Plate 1. Examples of the receiving environment showing existing developments in the northern extent of Erf 391 and views of the access road site and development site (Erf 155) from Main Street in the north and road PO394 in the south. Also note topography and vegetation cover.



Plate 2. Examples of the affected environment showing topography, vegetation cover and existing developments in the immediate surroundings. Except top left, all views are from Erf 155.

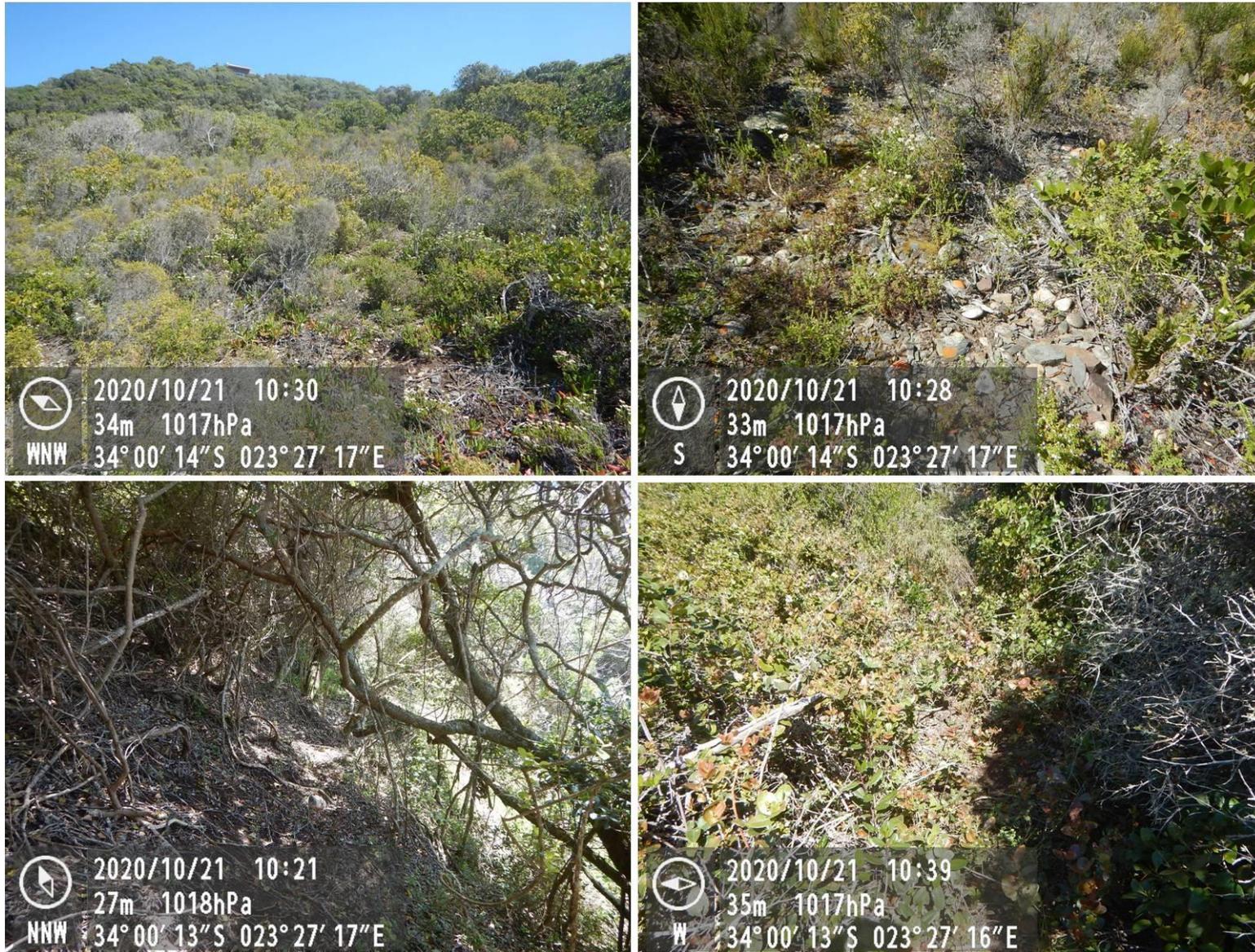


Plate 3. Examples of the affected environment showing topography, vegetation cover and exposed surfaces.



Plate 4. Examples of the affected environment showing vegetation cover and exposed surfaces as well as existing disturbances and pipeline.



Plate 5. Examples of the affected environment showing existing disturbances and minor excavations / trenching.