

# Heritage Statement

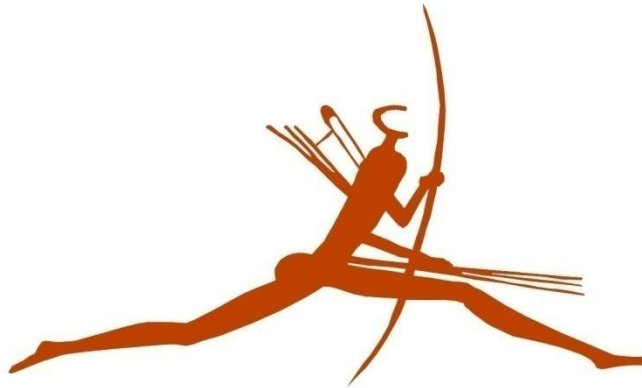
(DEA&DP Ref. No.: 16/3/3/6/1/D1/14/0146/22)

## Proposed Regional Cemetery on Portion 33 of Hill View Farm 437, Plettenberg Bay, Bitou Municipality and Administrative District of Knysna, Western Cape Province

for

**Eco Route Environmental Consultancy**, Ms. Samantha Teeluckdhari (EAPASA:  
2023/6443), PO Box 1252 Sedgefield 6573, Cell: 072 773 5397, E-mail:  
samantha@ecoroute.co.za and **The Applicant**, Bitou Municipality,  
Contact: Chris Schliemann, Address: Private Bag X1002, Plettenberg Bay, 6600,  
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by



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14 June 2023

## Summary - Conclusions & Recommendations

For reasons detailed in section 2, this report fulfils DEA&DP's requirement regarding comment from HWC (DEA&DP 2022).

The following conclusions and recommendations are arrived at after reviewing information obtained through:

- Previous heritage studies associated with 33/437;
- Mr Pether's palaeontological inputs,
- previous archaeological and heritage related studies in the surrounding area,
- SG Diagrams,
- historic aerial photographs, and
- a site inspection (archaeological walk-through).

The palaeontological sensitivity of the development footprint is low and even though Mr Pether recommends the inclusion of the Fossil Finds Procedure in the EMPr for the development, no palaeontological resources were identified during geotechnical test excavations (Nilssen 2014).

The proposed development footprint on 33/437 has been impacted by farming activities (ploughing, cultivation and grazing) during the colonial period, possibly from as early as the mid- to late-1700s. As a result, the context of pre-colonial heritage resources in surface sediments was damaged, disturbed or destroyed. No colonial period heritage resources were identified on the property.

Even though none were identified, if present on the property, then isolated Stone Age pieces like those identified on 3/437 are considered to be of low heritage value and are not conservation worthy (Nilssen 2014).

Due to the absence of significant heritage resources, the proposed activity will have negligible to no cumulative impacts on the archaeological or heritage value of the area.

This baseline investigation has shown that, if present, heritage resources on the affected part of the property would be of low significance and given a field rating of Not Conservation Worthy. Since there are no significant heritage resources associated with the proposed development footprint, it does not meaningfully contribute to the cultural landscape of the area.

For reasons given above and on heritage grounds, the proposed activity will have no negative impact on the aesthetic value of the area.

The positive socio-economic impact, including several short, medium and long term jobs as well as the provision of much needed cemetery space outweigh the negligible to zero negative impacts this project may have on heritage resources.

Because of the above, and because there is no reason to believe that significant heritage resources will be impacted by the proposed development on 33/437, it is recommended that no further heritage-related specialist studies are required and that a Heritage Impact Assessment is not warranted for the project.

Nevertheless it is recommended that Heritage Western Cape consider and/or require that the following be included in the Environmental Authorisation / Environmental Management Program, if the project is approved:

- even though 33/437 is of LOW palaeontological sensitivity, in case of a chance fossil discovery Mr Pether recommends that the Fossil Finds Procedure (FFP) is included in the Environmental Management Plan (EMP) for the Construction Phase of the development, basically “If fossil bones are uncovered during excavations, stop work and report to Heritage Western Cape (HWC)” – however, given the absence of palaeontological and archaeological remains in the geotechnical test pit excavations, this requirement is in question and may not be applicable,
- due to the disturbed nature of this part of 33/437, as well as the findings of the previous archaeological study and geotechnical excavations, archaeological monitoring is NOT recommended, but,
- if any human remains or significant archaeological materials are exposed during mining 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.

## 1. Name, Biosketch and Declaration of Specialist

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 260 heritage-related impact assessments and mitigation projects as Principal Investigator.

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:

Date: **14 June 2023**

## 2. Introduction & Background

The applicant, Bitou Municipality, is proposing a regional cemetery with associated infrastructure and amenities on Portion 33 of Hill View Farm 437 (hereafter 33/437). The relatively level, high-lying part of the property has been transformed since farming activities began in the area by at least the late 1800s or early 1900s (De Kock 2014), but possibly as early as the mid to late 1700s. The property is currently vacant, but an overhead power line (Eskom servitude) straddles the southern portion of the site, which is also littered with several rubbish and rubble dumps.

The environmental authorisation application process, presently a Draft Basic Assessment Report, is being facilitated by Ms Samantha Teeluckdhari of Eco Route Environmental Consultancy (hereafter Eco Route) who compiled a Screening Tool Report (Eco Route 2022) as well as a Site Sensitivity Verification Report (Eco Route 2022). In response to the latter, the Department of Environmental Affairs and Development Planning (DEA&DP) required comment from Heritage Western Cape (DEA&DP 2022). To this end this author was appointed to assist with the heritage process in terms of the National Heritage Resources Act (Act 25 of 1999; NHRA).

Proposed development on 33/437 was tabled twice at HWC. In response to a 2014 NID application, which also involved Portion 3 of Hill View Farm 437, HWC requested a Heritage Impact Assessment (HIA) consisting of an archaeological study, a built environment study as well as a visual impact assessment. In a subsequent exemption application made in 2017 and involving only 33/437, HWC decided that the exemption for the required HIA be granted on condition that monitoring is undertaken by a suitably qualified professional archaeologist. It is noted that HWC have confirmed via email to Eco Route that their 2017 decision still stands.

The report presented here is due to DEA&DP's requirement for comment from HWC on the following grounds.

"The STR indicates a LOW sensitivity for Archaeological and Cultural Heritage aspect. It is noted that the town planner submitted a Notice of Intent to Develop to the Heritage Western Cape (HWC) in terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) for exemption of conducting an HIA in 2017. HWC subsequently exempted the Bitou Municipality from undertaking a HIA" (DEA&DP 2022, pg. 3).

"However, it is not clear what information was submitted to HWC in order for them to consider the exemption since the Heritage Specialist, Mr Stefan de Kock and the Archaeological Specialist, Dr. Peter Nillsen recommended that an Integrated HIA and Archaeological statement be conducted. Therefore, for the EIA process to be undertaken, the proposed development will trigger provisions of Section 38(1) and comment must be obtained by HWC. The NID and all supporting documents (submitted to HWC) previously, must be appended to the Draft Basic Assessment report. Further comment must be obtained from HWC to ascertain whether the comment issued in terms of the rezoning application is still valid as this Directorate does not accept the decision taken by HWC on the planning application that this Department did not consider" (DEA&DP 2022, pg. 3).

"Notwithstanding the above, it is unclear if palaeontological aspects was taken into consideration. Therefore, a NID and supporting documents, which must be submitted to HWC, must be appended to the Draft Basic Assessment report" (DEA&DP 2022, pg. 4). As mentioned above, HWC have confirmed that their decision of 2017 still stands.

“In light of the above requirements from HWC please be advised that the Standard Operating Procedure between Heritage Western Cape and this Department must be followed” (DEA&DP 2022, pg. 4).

The document presented here is not a Heritage Impact Assessment, but rather, is a heritage scoping report – Heritage Statement - that provides additional information in support of the current environmental application.

### **3. Site Location and Development Proposal**

33/437 is located some 5 km West-North-West of Plettenberg Bay on the south Cape coast of the Western Cape Province with the centre of the property at approximately S 34° 0' 21.04" E 23° 26' 12.43" (WGS 84, see Locality Map and Figures 1, 2 and 3). 33/437 is 44.9761 ha in extent, while the proposed development footprint (Figure 4) is approximately 12 ha in extent and is registered to the South African National Roads Agency Limited (Title Deed No.: T38863/2008).

The following description of the proposed development is taken from the Site Sensitivity Verification Report (Eco Route 2022b). “The application area is currently land locked. It has no direct access as it is bordered by the expropriated N2 Bypass route along its southern and eastern boundaries. No direct access will be allowed from the current N2 National Road.

The application area will have to obtain access via Portion 3 of the Farm Hill View No 437 (Ebenebezer). An access servitude must be registered in favour of Portion 33 to allow for access to the cemetery.

Alternative 1 (Preferred Alternative) - 44,976ha total area; approximately 12ha development footprint

The preferred alternative includes the following:

- Regional cemetery
- Memorial garden
- Crematorium - It is not the intention to apply for the crematorium at this stage. The land is merely reserved for crematorium use in future. Should the local authority decide to develop a crematorium in future, the development will still have to comply with all the prescribed statutory authorisations such as the Environmental Legislation, etc.
- Chapel
- Parking bays
- Ablution block
- Caretakers dwelling
- Access road
- Private Open Space – 33,782ha. \*Possible future plans - The private open space will be used for recreational purposes such as hiking and biking trails that can contribute to tourist development” (Eco Route 2022b, Pg. 3).



Locality Map. General location of the study area (yellow star in white rectangle), Bitou Municipality, near Plettenberg Bay, Western Cape Province. Courtesy of Cape Farm Mapper (<https://gis.elsenburg.com/apps/cfm/>).





Figure 1. Enlarged from Locality Map showing 33/437 WNW of Plettenberg Bay. Courtesy of Cape Farm Mapper (<https://gis.elsenburg.com/apps/cfm/>). (A4 version below)

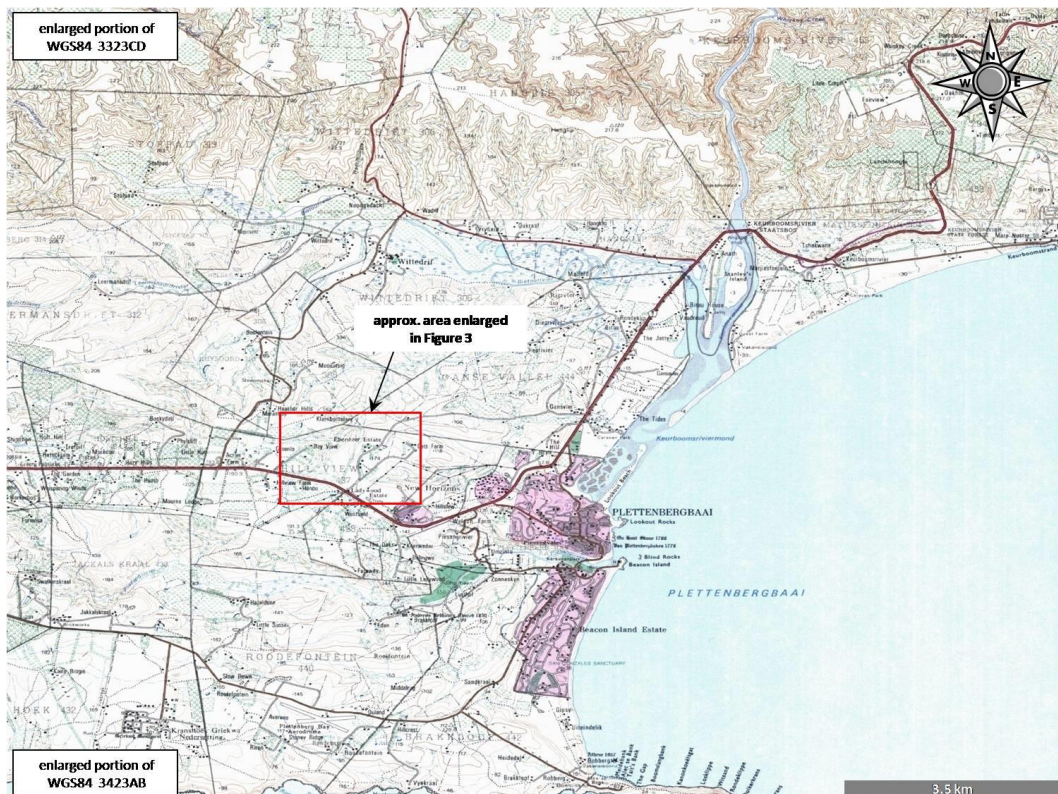


Figure 2. General location of the study area (red polygon) WNW of Plettenberg Bay, Western Cape Province. Enlarged portions of 1:50 000 topographic maps 3323 CD and 3423 AB (1998) courtesy of The Chief Directorate Surveys and Mapping, Mowbray. (A4 version below)





Figure 3. Enlarged from Figure 2 showing 33/437 (green polygon) and surrounding properties relative to the N2, Kwanokuthula and New Horizons. Courtesy of Cape Farm Mapper (<https://gis.elsenburg.com/apps/cfm/>). (A4 version below)

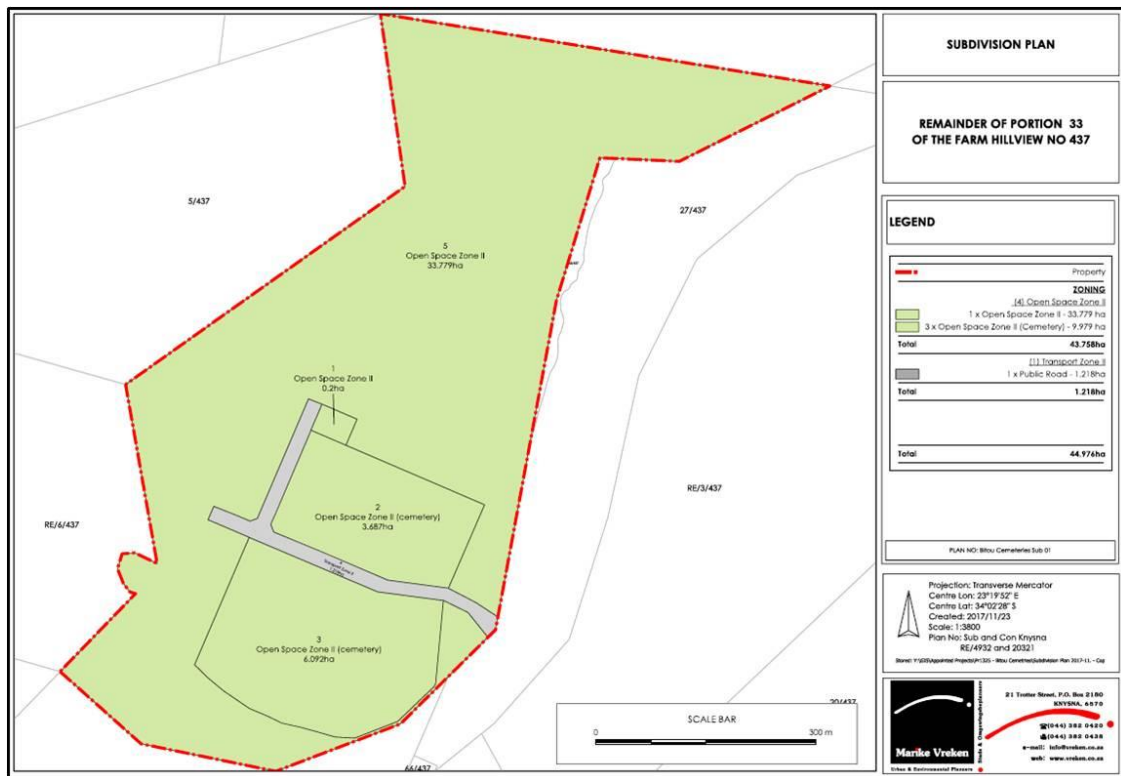


Figure 4. Preferred Site Development Plan. Courtesy of the client and Marike Vreken Urban and Environmental Planners (Vreken 2018). (A4 version below)



#### 4. Study Area

33/437 is landlocked with agricultural, rural and undeveloped areas to the west, north and east, while the residential developments of Kwanokuthula and New Horizons are situated to the south-west and south-east respectively (Figure 3). The south-east, developable portion of the property is relatively flat with steep slopes down to the Dieprivier in the west and north, and moderate to steep slopes down to a smaller drainage line in the east and north (Figures 3 & 4). An Eskom servitude and overhead powerline run through the southern part of the property while several vehicle and pedestrian tracks are present.

While the property is densely vegetated in the ravines and on steeper slopes in the west, north and east, the flatter high lying ground is more accessible than it was in 2014 (Nilssen 2014). The developable, high lying area is vegetated by mainly exotic trees, dominated by black wattle and blue-gums that are being felled and processed by members of the surrounding community. Although much of the southern portion of the development footprint is inaccessible, archaeological visibility is poor due to forest and leaf litter. Nevertheless, exposed surfaces in clearings, and along vehicle and pedestrian tracks provided good archaeological visibility. Examples of the study area are shown in Figures 5 through 15. Where applicable, directions of views are indicated on photographs with abbreviated compass bearing names such as E = east, ESE = east-south-east, and so on.



Figure 5. Views towards the study area from the N2. 33/437 is to the left of the reservoir (top) and set back some 90 m from the tree line adjacent to and north of the N2 (bottom).



Figure 6. Views towards the study area from the N2. Access road to reservoir, Plet Animal Welfare Service (PAWS) and 33/437 is to the right at vehicle (top) and site is set back some 90 m from the tree line adjacent to and north of the N2 with Kwanokuthula to the left or south of N2 (bottom).





Figure 7. Access road to reservoir, PAWS and 33/437 (top) and rubbish dumped adjacent to access road in vicinity of PAWS (bottom).





Figure 8. Views along the Eskom servitude in the southern part of 33/437 with overhead transmission lines, pylon and vehicle track.





Figure 9. Views along the Eskom servitude in the southern part of 33/437 with pylon and overhead transmission lines. Note steep slope to Dieprivier (bottom).





Figure 10. Examples of the southern part of the development footprint with woodcutters' clearings and forest and leaf litter.





Figure 11. Examples of the southern part of the development footprint with woodcutters' clearings, exposed surfaces and forest and leaf litter.





Figure 12. Examples of the northern part of the development footprint with woodcutters' clearings, exposed surfaces and vehicle tracks.





Figure 13. 180° panoramic views from the northern development footprint (top) and toward the northern development footprint (bottom). Note vehicle track, cleared areas and exposed ground surfaces.





Figure 14. Examples of the northern part of the development footprint with woodcutters' clearings and exposed ground surfaces.





Figure 15. Examples of the northern part of the development footprint with woodcutters' clearings and exposed ground surfaces.



## 5. Background Information & Previous Heritage Studies

33/437, the developable part of which falls within the urban edge, has been under investigation for the proposed development of a regional cemetery since 2013 (De Kock 2014, Vreken 2017 & 2018). Investigations and considerations to this end have included:

- Location;
- Property and Title Deed Information;
- Biodiversity;
- Heritage;
- Geohydrology;
- Geotechnical data;
- Spatial Planning and Socio-economic informants;
- Availability of Civil and Electrical services; and
- Traffic and Transport infrastructure.

Overall, it was concluded that “the proposed development as envisaged is generally consistent with the various policy guidelines of this area. It is the considered opinion that the proposed development will achieve a sensitive balance between the natural environment, the built environment and the social economic environment, that is imperative to ensure sustainable development” (Vreken 2018, Pg. 45).

In their response to an application for exemption from the requirement of a HIA for 33/437, HWC decided that no HIA is required for the application area on condition that monitoring of construction is undertaken by a suitably qualified archaeologist (Vreken 2018). HWC did not specify the reason(s) for their decision.

Note that the 2014 Background Information Document (BID) prepared in support of the HWC NID application included Portion 3 of Farm Hill View 437 (3/437), and that the heritage indicators identified at that time are associated with 3/437 and not with 33/437, which is under consideration here (De Kock 2014 and Nilssen 2014). Colonial period structures comprising the built environment as well as Stone Age archaeological resources were identified on 3/437 while no heritage resources were identified on 33/437 (De Kock 2014 and Nilssen 2014). The heritage practitioner’s and archaeologist’s recommendations as well as HWC’s requirement for a HIA that must include studies of the built environment, archaeology and visual impact were founded on these heritage resources being associated with 3/437 (De Kock 2014, Nilssen 2014 and Vreken 2017 & 2018). Since the fore-mentioned heritage resources were not identified on 33/437, there is no need for built environment or archaeological studies and a visual impact assessment on heritage grounds is thus not warranted. It is this author’s opinion that HWC granted exemption from the requirement of a HIA because 3/437 with associated heritage resources is no longer part of the application area (Vreken 2017 & 2018).

For ease of reference, extracts from the 2014 BID pertinent to 33/437 are provided below in the “colonial period” section (De Kock 2014). Virtually impenetrable vegetation was the main limitation to the 2014 site inspection, which restricted the foot survey to a narrow woodcutters’ trail and the fire break along the Eskom servitude. No structures were seen during field work (De Kock 2104).

### **Colonial Period**

“The proposed development area forms part of the freehold farm Hillview 437, then including adjoining farms Ladywood and Astley, was re-surveyed during 1903 (date of original survey

has not yet been determined) and measured  $\pm 1,242$  morgen in extent. Resurveying of the farm took place during August 1902 and coincided with its transfer in favour of Aaron Toplis. Note the farm already appears on early 1880-1890 mapping for the area (as shown with Figure 16). The development area is  $\pm 5.5$ km northeast of the Kranshoek Griqua settlement, which has a rich and proud history” (De Kock 2014 Pg. 6).

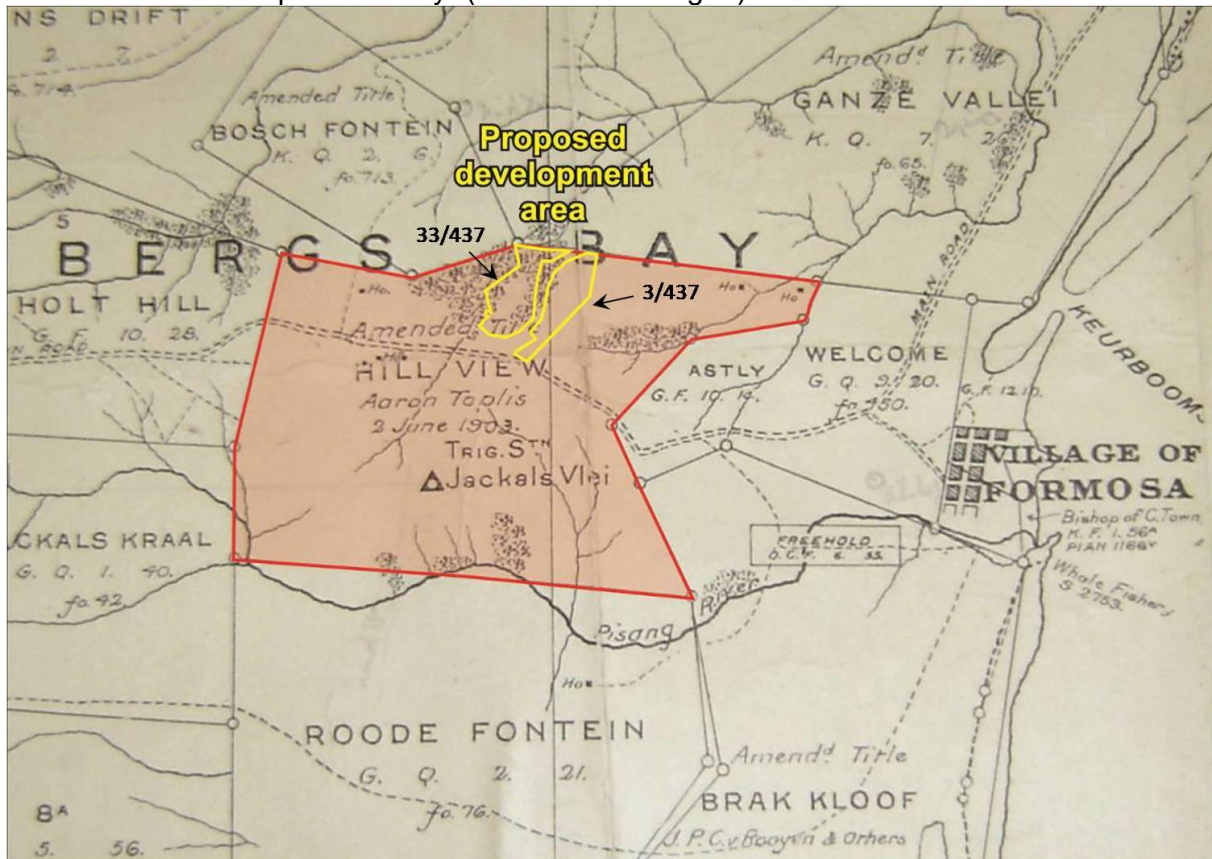


Figure 16. Approximate location of 33/437 relative to original boundaries of early farm Hill View as per 1880-1890 SG Mapping for Plettenberg Bay area (annotated after De Kock 2014 Pg.7 Figure 4; Source: CDSM:). No structures are indicated on 33/437.

“A sketch of the “Country between Knysna and Plettenberg Bay” drawn by William Henry Newdigate<sup>3</sup> (c. 1850-1860) was meant to record the location of “principle houses and inhabitants” at the time but also gives insight into early land use and alignment of the coastal route between Knysna and Plettenberg Bay. The sketch, which Newdigate admits as “not being to scale”, shows the ravine directly west of present day Hillview 437/33 (Figure 17). Then a bachelor aged 21 years, WH Newdigate came to South Africa from Warwickshire, England in about 1846. He later married George Rex’s grand-daughter, Caroline Duthie (from Belvidere) and resided at Redbourne farm, southeast of the proposed development area” (De Kock 2014 Pg. 6 & 7).

Note that in neither of Figures 16 or 17 are structures indicated on 33/437 or in its immediate surroundings. The alleged structures indicated by De Kock (2014 Pg. 8, Figure 6) are not definitively identifiable as structures when the image is enlarged, whereas structures are visible on 3/437 to the east (Figure 18). This author’s walk tracks of 2014 and 2023 covered the locality of the alleged structures and none were seen. Nevertheless, the 1942 image clearly shows that most of 33/437 was cleared for agricultural purposes (Figure 18). Consequently, surface sediments and their contents were disturbed by early farming activities.



Figure 17 (5). Approximate location of proposed development area transposed onto extract from sketch (not to scale) of the “Country between Knysna and Plettenberg Bay by WH Newdigate, c. 1850-1860 (annotated after De Kock 2014 Pg.7 Figure 5; Source: Plettenberg Bay and The Paradise Coast”, Patricia Storrar, 2001).



Figure 18. 33/437 boundary (green polygon) overlaid onto 1942 aerial imagery using Google Earth (redrawn after De Kock 2014 Pg.8 Figure 6; Source: Aerial Survey 6, Flight strip 39, Image 10487). The overlay is approximate and not precise. On close scrutiny, the dark “dots” in white ellipse are not identifiable as structures. Note that the bulk of the property was cleared for agricultural purposes.



Unfortunately the high resolution versions of 1936, 1958 and 1972 aerial images ordered on 19 May 2023 by this author were not received by the time of this writing. Nevertheless, no legible or definitive structures appear on the low resolution versions of the historic aerial images that include 33/437. Careful inspection of enlarged SG Diagrams and the 1998 topographic map also revealed the absence of structures on 33/437 (Figures 19, 20 & 21).

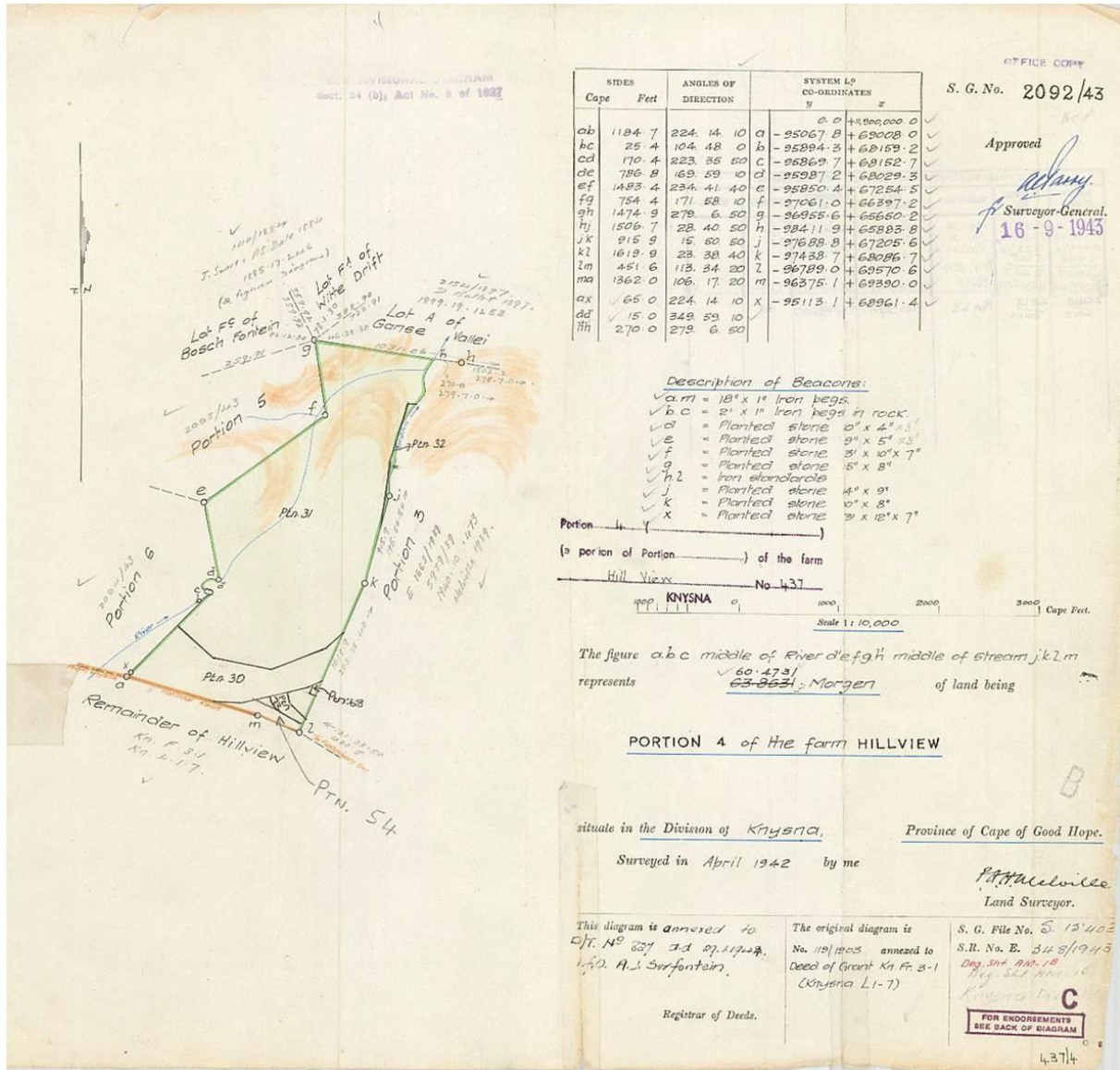


Figure 19. SG Diagram 2092/43 (1943) shows that no structures are indicated on what is now 33/437.

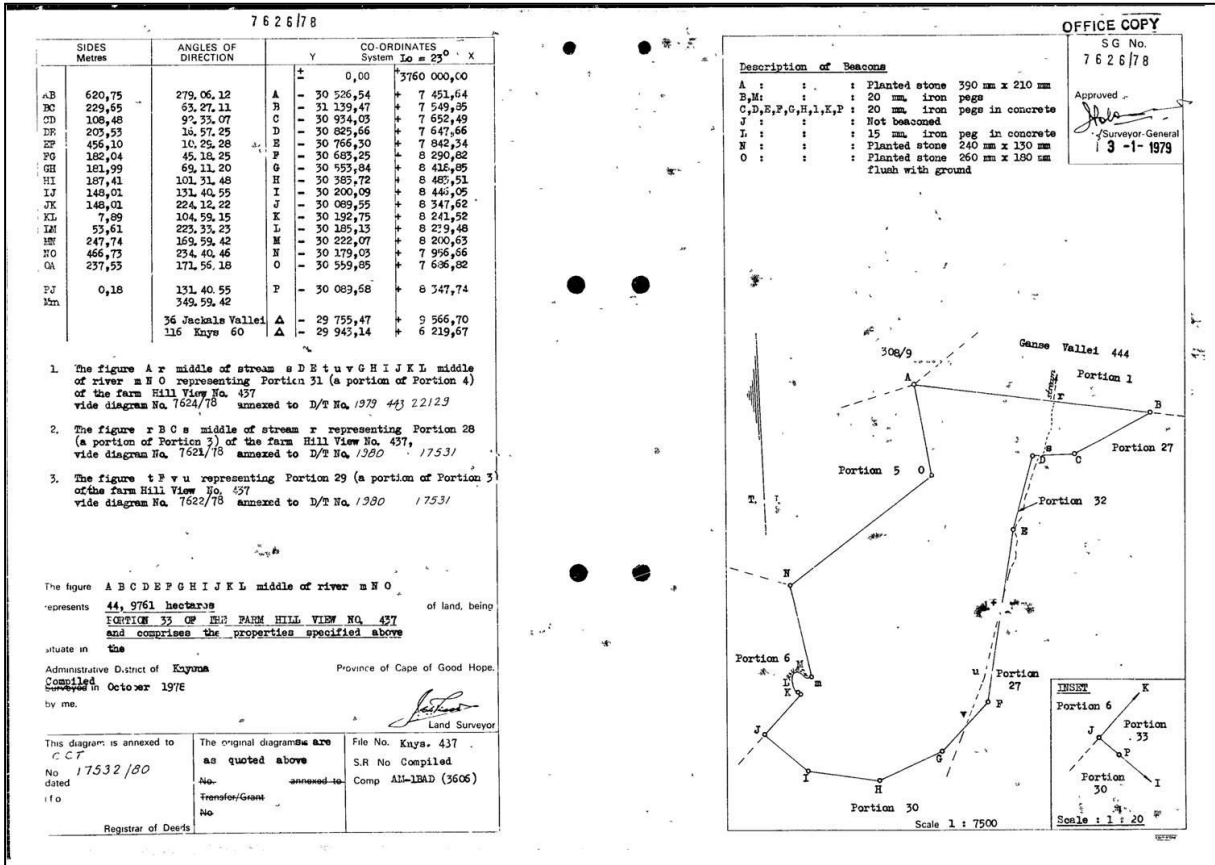


Figure 20. SG Diagram 7626/78 (1978) shows that no structures are indicated on 33/437.

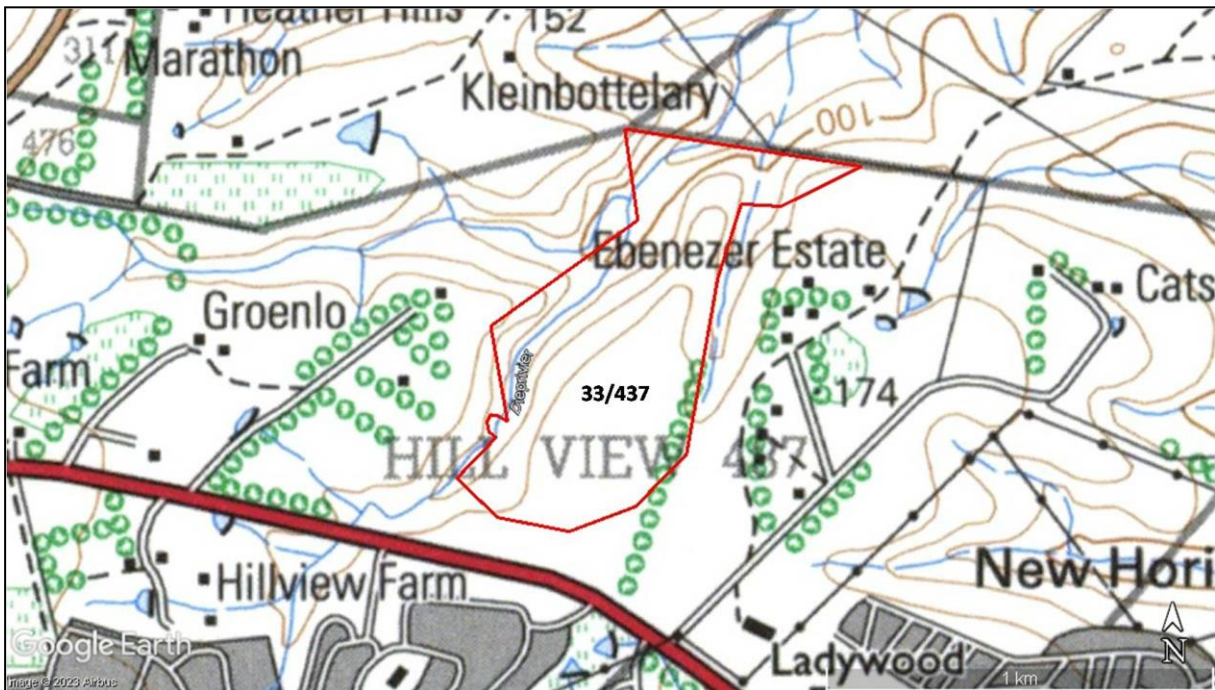


Figure 21. Enlarged portion of 1:50 000 topographic map 3423AB Plettenberg Bay, 1998 shows that no structures are indicated on 33/437 (red polygon) while numerous structures are present in the surroundings. Courtesy of the Chief Directorate Surveys and Mapping, Mowbray and Google Earth 2023.



## Palaeontology

Although not covered in the BID document (De Kock 2014 & DEA&DP 2022), the palaeontological theme was flagged as “very high sensitivity” in the DFFE Screening Tool Report even though the vast bulk of 33/437 is shaded as “low sensitivity” (Figure 22; also see Eco Route 2022a & 2022b).

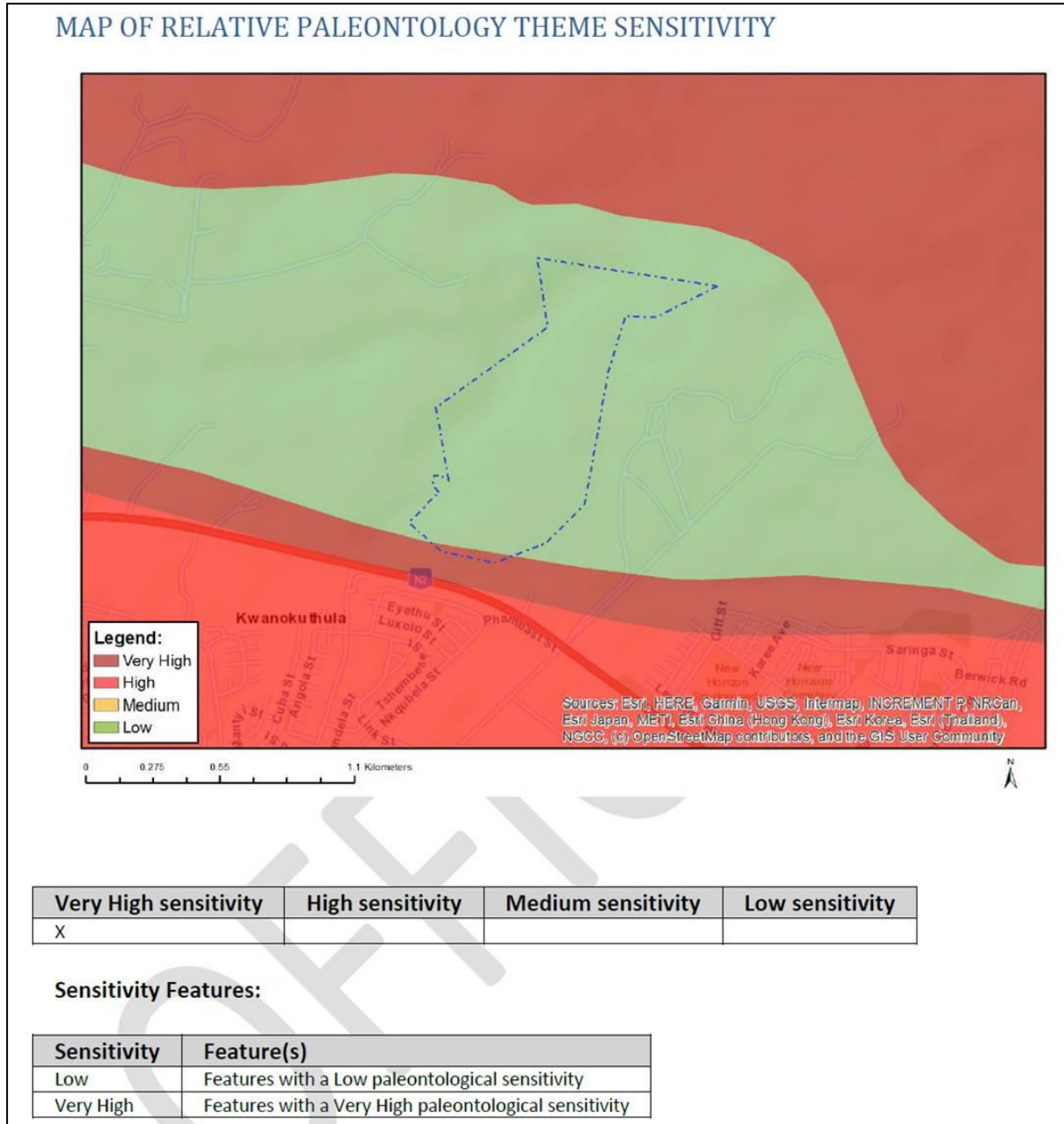


Figure 22. Map of relative palaeontology theme sensitivity from the DFFE screening tool report (Eco Route 2022). 33/437 is represented by the area within the polygon (dashed blue line).

Palaeontologist, Mr John Pether was consulted by this author (Pether 2023, email correspondence available on request). Mr Pether responded as follows:

“Given the inherent error of the original small-scale 1:250k geomap (3322 Oudtshoorn; Figure 23) and georeferencing error in the SAHRIS Palaeo-Map (Figure 24), I thought to check the positioning. I have previously noticed that the SAHRIS georeferencing is a bit out by 100-200 m. The positioning of the property polygon obtained from CapeFarmMapper is shown in Figures 23 & 24.

The northern 33/437 boundary coincides with the farm boundary of the geomap, evidently the correct relative positioning, with 33/437 entirely located on the Goudini Formation (BLUE/LOW) – trace fossils in places, but not an area for good preservation.

The precise positioning is anyway moot as the VERY HIGH palaeo-sensitivity of the Cedarberg Fm. shale does not apply in this area, due to tectonism and deep weathering the fossil potential is destroyed. The best fossils are in the Cedarbergs.

The trace fossils in the bedrock of the Goudini Fm. are mainly in the mudrock intervals which are most affected by deformation in the southern Cape Fold Belt, as zones of shearing and shaley cleavage development. This bedrock has been deeply weathered, with alteration to clays. The mudrock units are seldom exposed on the coastal plain due to preferential erosion. As also applies to the Cedarberg Fm. The Fossil Finds Procedure (FFP), *to be included in the EA and/or EMPr*, would then be adapted to apply to anything in the soil mantle – any bones, marine shell, artefacts, etc” (Pether 2023 email comms).



Figure 23. Enlarged portion of 1:250 000 Geological Map (3322 Oudtshoorn; Pether 2023, email).

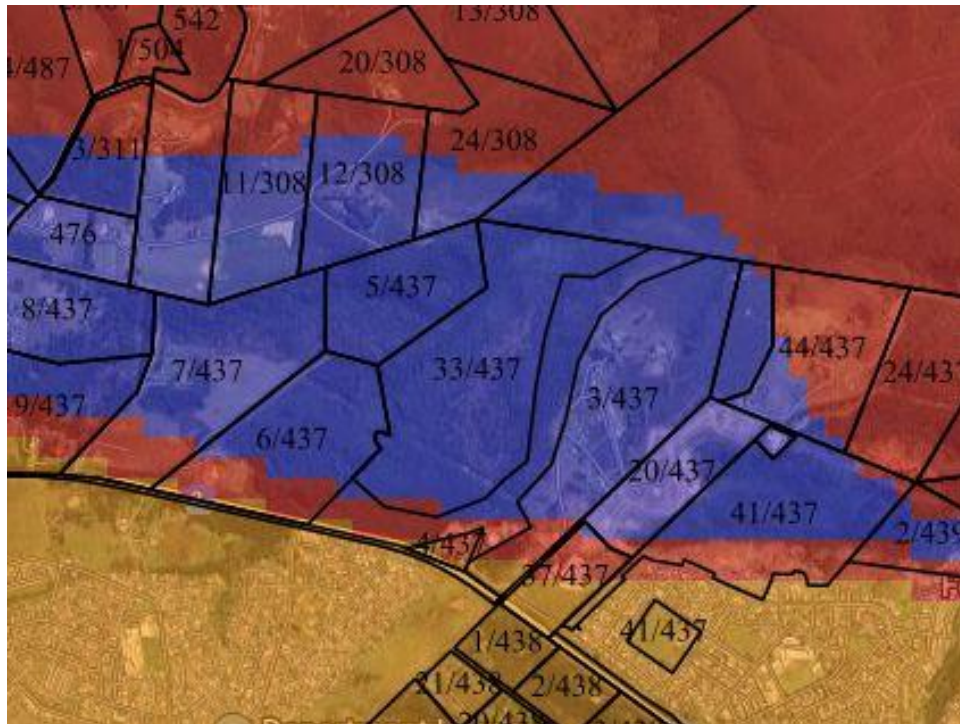


Figure 24. Enlarged portion of SAHRIS PalaeoSensitivity Map (Pether 2023, email). Blue shading means that palaeontological studies are not required but that the Fossil Finds Procedure (FFP) is required.

The links to HWC and the FFP are below:

<https://www.hwc.org.za/node/89>

[https://www.hwc.org.za/sites/default/files/3\\_11%20Protocol%20Fossil%20Finds%20Final%20June%202016.pdf](https://www.hwc.org.za/sites/default/files/3_11%20Protocol%20Fossil%20Finds%20Final%20June%202016.pdf)

In the event that chance discoveries are made, Heritage Western Cape will assess the information and liaise with an archaeological or palaeontological specialist, as appropriate.

### **Archaeology**

The DFFE screening tool map and table for the archaeological and cultural heritage theme sensitivity shown in Figure 25 indicates that 33/437 falls within an area of low sensitivity (Eco Route 2022). In this regard, the results of the basic investigation conducted in 2014 and here concur with the DFFE screening tool report's attribution of low sensitivity with respect to heritage resources (De Kock 2014 and Nilssen 2014).

"The Plettenberg Bay region has a rich Stone Age archaeological record, where cave and open sites as well as shell middens with Middle Stone Age (MSA) and Later Stone Age (LSA) deposits are particularly common on and around the Robberg Peninsula (Kaplan 1993). Because of predictable food sources, the coastal strip has been a frequently inhabited zone for many thousands of years. The closest and most significant heritage sites are; the Provincial Heritage Site of Nelson Bay Cave, which is situated on the Robberg Peninsula, approximately 8 km south-west of the study area, and the Provincial Heritage Site of Matjes River Cave, located near Keurboomstrand, some 14 km to the east-north-east of the study area" (Nilssen 2014 Pg. 4).

Archaeological studies in the nearby environment of the study area show that the immediate surroundings are generally not archaeologically sensitive, and for the most part, the record



includes a mixture of Early and Middle Stone Age stone artefacts that lack formal tools such as hand axes, cleavers, blades and points (Deacon 2007, Kaplan 2004 & 2008, Nilssen 2010, 2011 & 2014 and Yates 2006). In all the reviewed cases, the archaeological record is considered to be of low local significance due to their mixed and derived nature, the low densities of artefacts in these occurrences, and the absence of other cultural and subsistence remains.

Due to impenetrable vegetation cover, the 2014 field investigation was limited to a relatively small area along woodcutters' trails, the fire break along the Eskom servitude and geotechnical clearings and excavations (Nilssen 2014). Nevertheless, not a single heritage resource of pre-colonial or colonial period origin was identified on 33/437 while several Stone Age implements and colonial period structures and features were recorded on 3/437 (Nilssen 2014 and De Kock 2014).

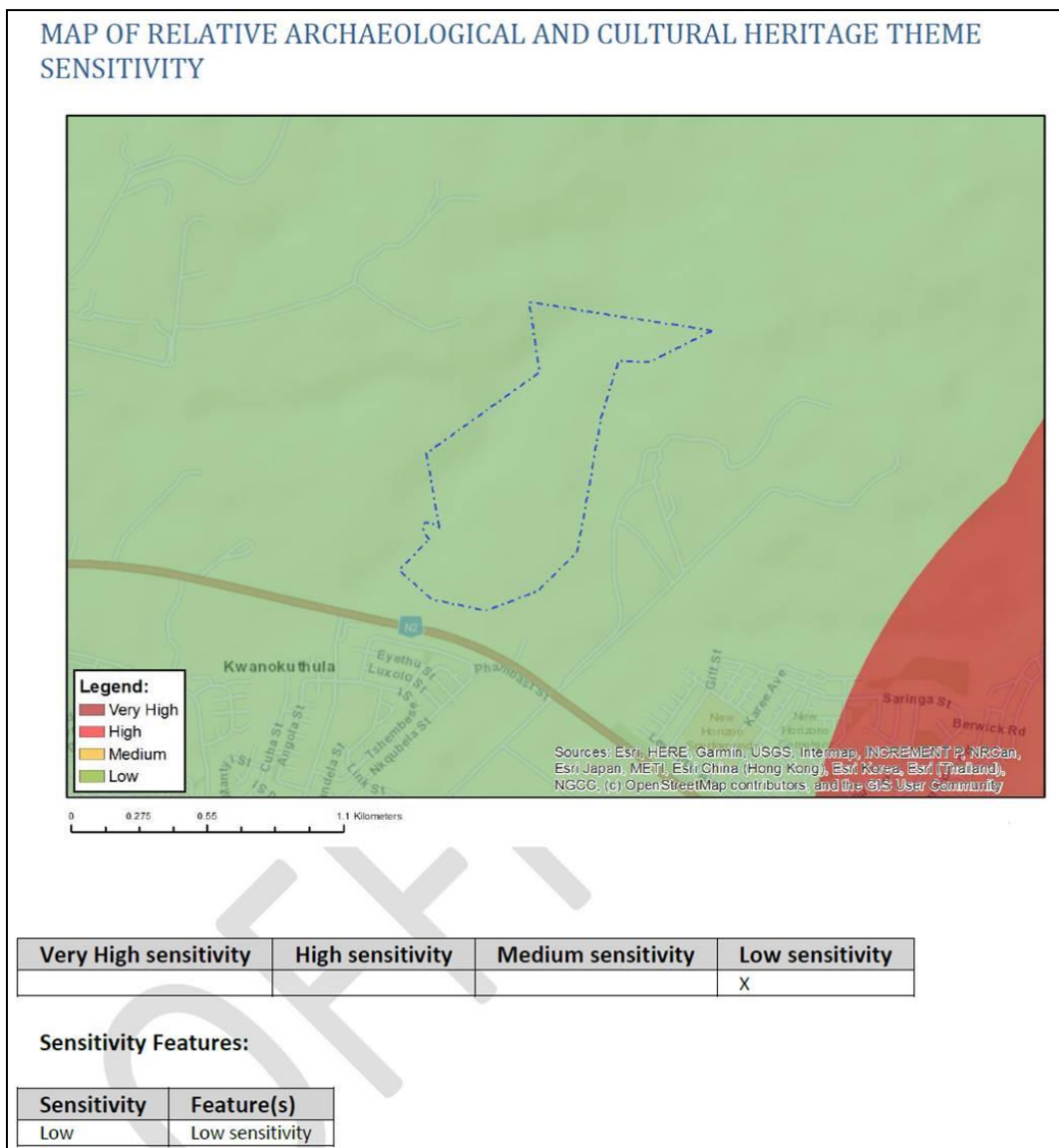


Figure 25. Map of relative archaeological and cultural heritage theme sensitivity from the DFFE screening tool report (Eco Route 2022a). 33/437 is represented by the polygon (dashed blue line).

Due to vegetation clearing, ploughing, cultivation, and the grazing of domestic stock during the colonial period and modern times, surface sediments in the proposed development footprint are significantly disturbed. Consequently, the context of any pre-colonial archaeological remains on or in those sediments is also disturbed and thus compromised and of questionable or low heritage value.

Overall, based on the above, it is not expected that any significant palaeontological, archaeological or cultural heritage resources occur on 33/437. It is anticipated that the only heritage resources, though in disturbed context, that may be found on the property are isolated Stone Age pieces or very low density scatters of Stone Age implements (Grade IIIC or Not Conservation Worthy),

### 6. Site Inspection and Results

The first archaeological site inspection was conducted by this author on 26 May 2014 when the property was densely vegetated (Figure 26). Because nine years had lapsed, a second survey was done on 28 May 2023 (Figure 27). Figures 26 and 27 as well as photographic evidence show that the property was cleared of a considerable amount of trees and vegetation and hence coverage was notably better in 2023. The archaeological foot survey focused on the footprint of the preferred site development plan and was conducted independently and on foot (Figure 27). Due to more exposed ground surfaces, archaeological visibility was notably better in 2023.

Survey tracks and observations were fixed with a hand held Garmin Etrex 30x GPS to record the investigated area its heritage related contents (Figures 26 and 27). A high quality, comprehensive digital photographic record was also made with a Samsung Galaxy A70 and a DooGee S86 cellular phone, including location data for photographs. All GPS and photographic data are available on request.

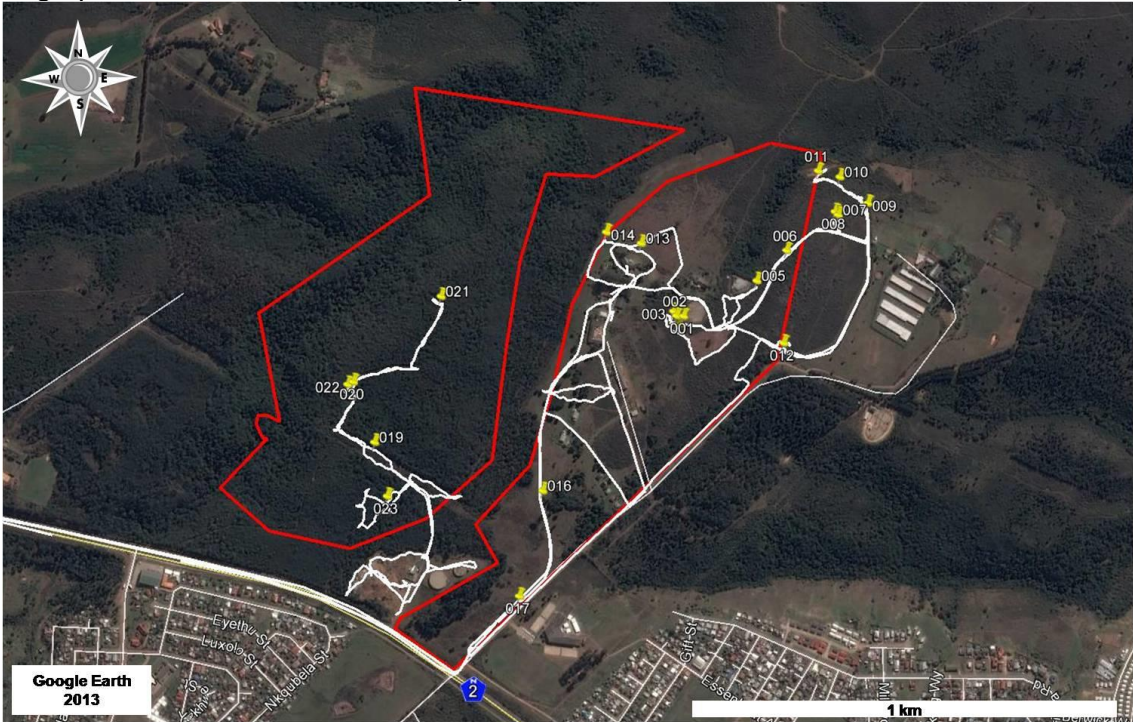


Figure 26: 33/437 (red polygon on left) with GPS-fixed survey tracks (white lines; Nilssen 2014 Pg. 12 Figure 4).





Figure 27: 33/437 (green polygon) with preferred SDP (white polygon) and GPS-fixed archaeological survey tracks (red lines). (A4 version below).

The property was examined with a focus on the presence and significance of heritage related resources of both colonial and pre-colonial origin. Heritage resources listed in Section D of the HWC NID application form were considered, but are not listed here unless they are present on or in the immediate vicinity of 33/437, or if they are anticipated to occur on or in the immediate vicinity of the property. Even though access and archaeological visibility was limited in the southern section of the preferred SDP, adequate observations were made for the purpose of informing this report.

The approach was to;

- walk and inspect as much of the preferred SDP footprint as possible to gain an understanding of its archaeological and heritage sensitivity by accessing as many exposed and disturbed areas as possible,
- and the site inspection was completed with an evaluation of the visibility of the site from the N2 in the South.

The site inspection identified no heritage resources and it is not expected that the proposed development will have an impact on heritage resources or the heritage value of the area.

The proposed development site is not visible from the N2 (Figures 5 & 6). Nevertheless, there are no heritage resources on 33/437 that will be visually impacted by the proposed development. Consequently, from a heritage standpoint, the scenic route will not be negatively impacted by the proposed development.

Furthermore, since there are no significant heritage resources or features associated with 33/437 or the proposed development footprint, the proposed activity will have a negligible to no impact on the existing cultural landscape of the area.

## 7. Conclusions and Recommendations

For reasons detailed in section 2, this report fulfils DEA&DP's requirement regarding comment from HWC (DEA&DP 2022).

The following conclusions and recommendations are arrived at after reviewing information obtained through:

- Previous heritage studies associated with 33/437;
- Mr Pether's palaeontological inputs,
- previous archaeological and heritage related studies in the surrounding area,
- SG Diagrams,
- historic aerial photographs, and
- a site inspection (archaeological walk-through).

The palaeontological sensitivity of the development footprint is low and even though Mr Pether recommends the inclusion of the Fossil Finds Procedure in the EMPr for the development, no palaeontological resources were identified during geotechnical test excavations (Nilssen 2014).

The proposed development footprint on 33/437 has been impacted by farming activities (ploughing, cultivation and grazing) during the colonial period, possibly from as early as the mid- to late-1700s. As a result, the context of pre-colonial heritage resources in surface sediments was damaged, disturbed or destroyed. No colonial period heritage resources were identified on the property.

Even though none were identified, if present on the property, then isolated Stone Age pieces like those identified on 3/437 are considered to be of low heritage value and are not conservation worthy (Nilssen 2014).

Due to the absence of significant heritage resources, the proposed activity will have negligible to no cumulative impacts on the archaeological or heritage value of the area.

This baseline investigation has shown that, if present, heritage resources on the affected part of the property would be of low significance and given a field rating of Not Conservation Worthy. Since there are no significant heritage resources associated with the proposed development footprint, it does not meaningfully contribute to the cultural landscape of the area.

For reasons given above and on heritage grounds, the proposed activity will have no negative impact on the aesthetic value of the area.

The positive socio-economic impact, including several short, medium and long term jobs as well as the provision of much needed cemetery space outweigh the negligible to zero negative impacts this project may have on heritage resources.

Because of the above, and because there is no reason to believe that significant heritage resources will be impacted by the proposed development on 33/437, it is recommended that no further heritage-related specialist studies are required and that a Heritage Impact Assessment is not warranted for the project.



Nevertheless it is recommended that Heritage Western Cape consider and/or require that the following be included in the Environmental Authorisation / Environmental Management Program, if the project is approved:

- even though 33/437 is of LOW palaeontological sensitivity, in case of a chance fossil discovery Mr Pether recommends that the Fossil Finds Procedure (FFP) is included in the Environmental Management Plan (EMP) for the Construction Phase of the development, basically “If fossil bones are uncovered during excavations, stop work and report to Heritage Western Cape (HWC)” – however, given the absence of palaeontological and archaeological remains in the geotechnical test pit excavations, this requirement is in question and may not be applicable,
- due to the disturbed nature of this part of 33/437, as well as the findings of the previous archaeological study and geotechnical excavations, archaeological monitoring is NOT recommended, but,
- if any human remains or significant archaeological materials are exposed during mining 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.

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Figure 1. Enlarged from Locality Map showing 33/437 (green polygon) WNW of Plettenberg Bay. Courtesy of Cape Farm Mapper (<https://gis.elsenburg.com/apps/cfm/>). (A4 version below)



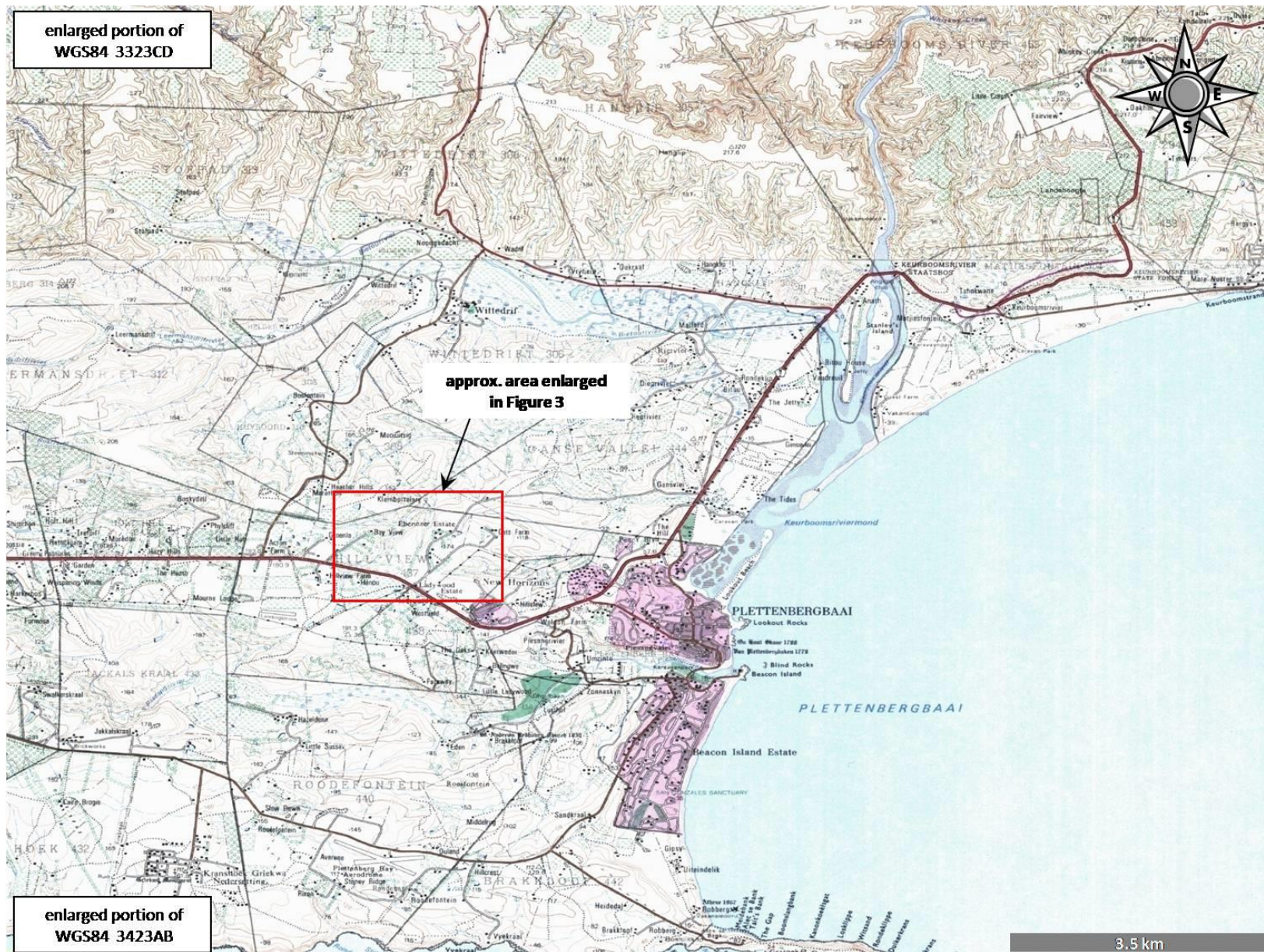


Figure 2. General location of the study area (red polygon) WNW of Plettenberg Bay, Western Cape Province. Enlarged portions of 1:50 000 topographic maps 3323 CD and 3423 AB (1998) courtesy of The Chief Directorate Surveys and Mapping, Mowbray.





Figure 3. Enlarged from Figure 2 showing 33/437 (green polygon) relative to the N2, Kwanokuthula and surrounding properties and developments. Courtesy of Cape Farm Mapper (<https://gis.elsenburg.com/apps/cfm/>).

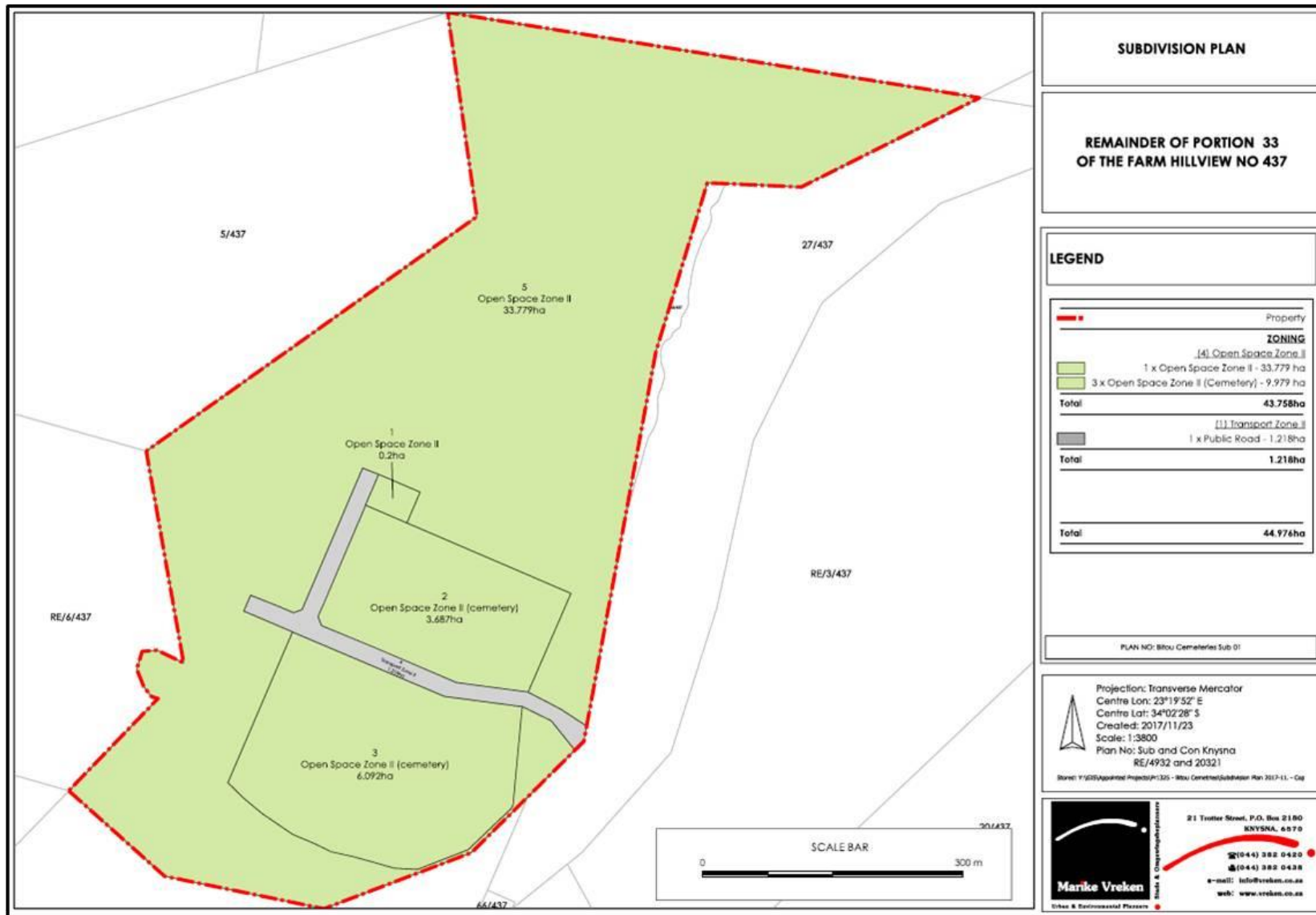


Figure 4. Preferred Site Development Plan. Courtesy of the client and Marike Vreken Urban and Environmental Planners (Vreken 2018).



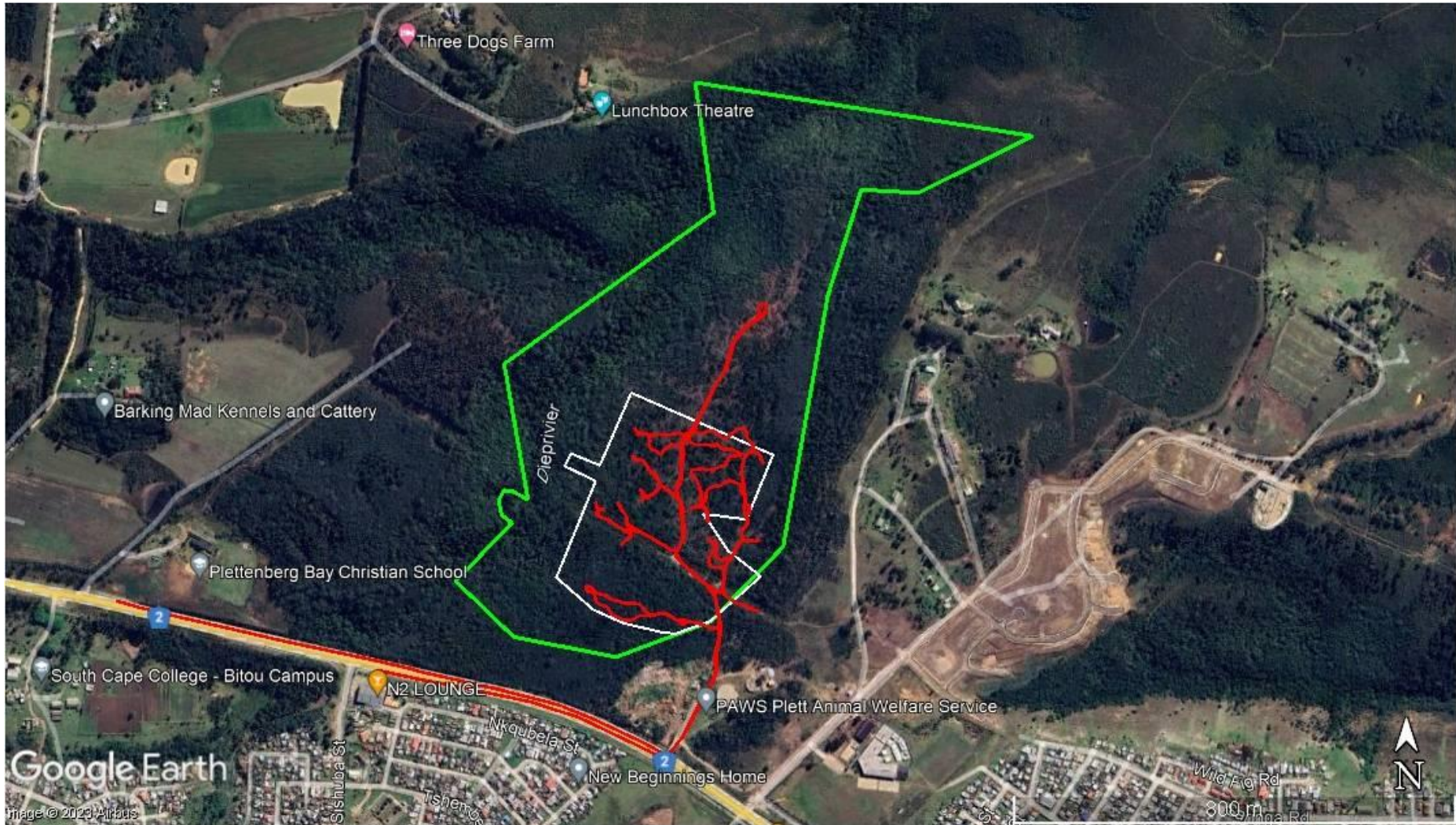


Figure 27: 33/437 (green polygon) with preferred SDP (white polygon) and GPS-fixed archaeological survey tracks (red lines).