

ARCHAEOLOGICAL IMPACT ASSESSMENT  
In terms of Section 38(8) of the NHRA for a  
PROPOSED ABALONE FARM ON ERF 385, PEARLY BEACH WESTERN CAPE

DEA Ref:  
HWC Ref: 18090507SB1002E

Prepared by  
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For Pearly Beach Seafarm (Pty) Ltd

9 May 2019



## EXECUTIVE SUMMARY

### 1. Site Name

The applicant, Pearly Beach Seafarm (Pty) Ltd has proposed the establishment of an aquaculture facility for the production of Abalone on Remainder of Farm 385, Pearly Beach, Overstrand Municipality, Overberg District.

### 2. Location

The project site is located 1km west of Pearly Beach, 22km east of Gansbaai and some 600m east of the Uilkraalsmond Nature Reserve. The project site comprises Remainder of Farm 385, Pearly Beach, Overstrand Municipality, Overberg District. The site is bounded by the coast at the southern extent to the R43 to the north east.

### 3. Locality Plan



Locality Plan showing proposed project site in red.

#### 4. Description of Proposed Development

Pearly Beach Seafarm (Pty) Ltd has proposed the establishment of an aquaculture facility for the production of Abalone on Remainder of Farm 385, Pearly Beach, Overstrand Municipality, Overberg District. The development, which is proposed to be undertaken in 6 phases of 160 tons / approximately 2.5 ha, will eventually see the production of 1000 tons of abalone over an area of approximately 19 ha.

The development will entail the following:

- Grow out area (Phases 1 to 6)
- Processing area including canning, freezing, live packing & drying
- Algae / Seaweed culture area
- Administration block
- 2 ha solar array generating approximately 2.5 megawatts
- Hatchery (approx. 7500 m<sup>2</sup>)
- Approx. 9 dwellings for management personnel
- Intake and effluent lines (3 intake lines capable of 3600 m<sup>3</sup>/ hour each), one effluent line to discharge in line with conditions of the Coastal Waters Discharge Permit (CWDP)
- Access via existing jeep track on east boundary, to be upgraded to a hardened dirt road
- Will not affect public access to coastline
- Additional infrastructure i.e. ablutions, canteen, sump & pump house, workshops, power transmissions room for generators, freshwater storage etc.

The total development footprint will be approximately 5 000m<sup>2</sup>

#### 5. Heritage Resources Identified

The archaeological survey identified several archaeological sites consisting of artefact/marine shell scatters within and immediately adjacent to the development footprint. Eleven Later Stone Age sites were identified, comprising four sites of medium significance and six of low significance. All the sites consisted of shell middens or scatters of shell with varying quantities of associated artefactual material. No bone or ostrich eggshell beads or fragments were identified, with only a single sherd of indigenous pottery recorded. No historical archaeology was identified, nor were any graves, either formal or informal.

#### 6. Anticipated Impacts on Heritage Resources

Given the proposed location of the bulk of the infrastructure along the shoreline, in the area where the sites are prevalent, it is likely that, without mitigation, impacts to these sites will be **moderate to high**. Mitigation was recommended for the four medium significance sites, by way of no-go buffer zones of varying extent, or excavation prior to development. As the layout was subsequently changed to avoid those sites and their buffers, the likely impacts are deemed to be **very low to low**.

No significant impacts are anticipated from the development of the north eastern extent of site, where the accommodation facilities and other auxiliary structures are to be located due to the general lack of archaeological sites at this distance from the coastline.

## 7. Conclusions and Recommendations

This assessment has shown that the coastal region of the proposed development site contains, as expected, several archaeological heritage sites, in the form of shell middens of varying densities, and ephemeral shell scatters. While none of these is of very high significance, the better preserved middens (Sites PBAF512, PBAF612, PBAF1012 and PBAF1612), which contain varied stone artefacts and well preserved shellfish remains are of medium significance and warrant protection or mitigation through excavation should they be disturbed or damaged by the proposed development.

In response to these identified sites, the layout of the infrastructure has been revised to ensure that the site buffers are observed. The sites are therefore not deemed to be at risk of damage or disturbance, and mitigation is not required.

The following recommendations were made:

- Sites **PBAF512 (S34°39.579' E19°28.146')**, **PBAF612 (S34°39.583' E19°28.123')** and **PBAF1012 (S34°39.551' E19°28.005')** should be fenced off prior to development activities commencing on site. The erection of the fence is to be undertaken under supervision by an archaeologist. No development related activities are to be permitted, including foot or vehicle traffic, within 10m of the site. This fencing should be maintained in place for the duration of the operational life and decommissioning of the facility.
- Site **PBAF1612 (S34°39.563' E19°27.990')** should be fenced off prior to development activities commencing on site. The erection of the fence is to be undertaken under supervision by an archaeologist. No development related activities are to be permitted, including foot or vehicle traffic, within 15m of the site. This fencing should be maintained in place for the duration of the operational life and decommissioning of the facility.
- Vegetation clearing operations, particularly in the coastal foredunes, must be monitored by a professional archaeologist. If any archaeological deposits are exposed, these might need to shovel tested under a Work Plan permit, to determine the potential significance of the deposits.
- Bulk earthworks (e. g. for water, electricity, sewerage, & intake & discharge pipelines) must be monitored by a professional archaeologist. This can be done in consultation with the

Environmental Control Officer (ECO) who must be on site during the Construction Phase of the project. The archaeologist does not need to be on site permanently, but should visit the site at least once a week during the Construction Phase, or when the need arises. If any archaeological deposits are exposed during these activities, these may need to be sampled or excavated to determine the significance of the deposits.

- Excavations for building foundations (e. g. proposed managers house, administration offices, intake & effluent area) must be monitored by a professional archaeologist. If any archaeological deposits are exposed during these activities, these may need to be sampled or excavated to determine the significance of the deposits.
- If any unmarked Khoesan graves are uncovered or exposed during bulk earthworks and excavations, these must immediately be reported to the contracted archaeologist or Heritage Western Cape (Att: Mr Andrew September 021 483 9685). In the case of human burials, these will have to be removed under a permit issued by HWC.

The layout of the proposed facility was adjusted to avoid all significant archaeological sites. As such, no mitigation is required prior to the commencement of development on the site.

It is recommended that the project be authorised, subject to implementation of the above recommendations. These recommendations should be included in the Environmental Management Programme (EMP) and the Environmental Authorisation (EA).

#### **8. Author/s and Date**

Archaeological fieldwork and notes: Jonathan Kaplan

AIA and mapping: Katie Smuts

9 May 2019

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## **1. BACKGROUND TO DEVELOPMENT PROPOSAL**

Pearly Beach Seafarm (Pty) Ltd has proposed the establishment of an aquaculture facility for the production of Abalone on Remainder of Farm 385, Pearly Beach, Overstrand Municipality, Overberg District (Figure 1). The development, which is proposed to be undertaken in 6 phases of 160 tons / approximately 2.5 ha, will eventually see the production of 1000 tons of abalone over an area of approximately 19 ha. The total development footprint will be approximately 5 000m<sup>2</sup>.

The development will entail the following:

- Grow out area (Phases 1 to 6)
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- Access via existing jeep track on east boundary, to be upgraded to a hardened dirt road
- Will not affect public access to coastline
- Additional infrastructure i.e. ablutions, canteen, sump & pump house, workshops, power transmissions room for generators, freshwater storage etc.

## **2. DESCRIPTION OF THE AFFECTED ENVIRONMENT**

The proposed development site is located about 1.0km south west of Pearly Beach in the Overstrand region of the Western Cape. The site for the proposed abalone farm comprises a series of fairly high, stable, undulating dunes extending quite far back into the site. The whole length of the property spans almost 3.5km from the coastline to the R43 (Figure 2 and Figure 3). The frontal dunes overlooking the long sandy beach particularly are infested with alien Rooikrantz vegetation. The back dune area is similarly densely vegetated, and mostly covered with natural grasses and pristine Fynbos. The north eastern portion of the site is covered in a mix of both natural vegetation – Fynbos and grasses – and Rooikrantz. Wind erosion in the western sector has exposed a hard surface area of calcrete. Evidence of a recent fire through the area is widespread.

Existing infrastructure comprises old farm roads, barely visible tracks and footpaths, a concrete water reservoir in the north east, concrete fence poles, rusted wire fencing, and an old windmill on a slight hill slope in the north western portion of the site (Figure 4 to Figure 10). The tracks and footpaths are used by abalone poachers, with visible signs of poaching (piles of shucked abalone shells, condom packs, soda cans & plastic bottles). Surrounding land use is intensive abalone poaching, recreation (fishing & swimming) and marginal wood harvesting.

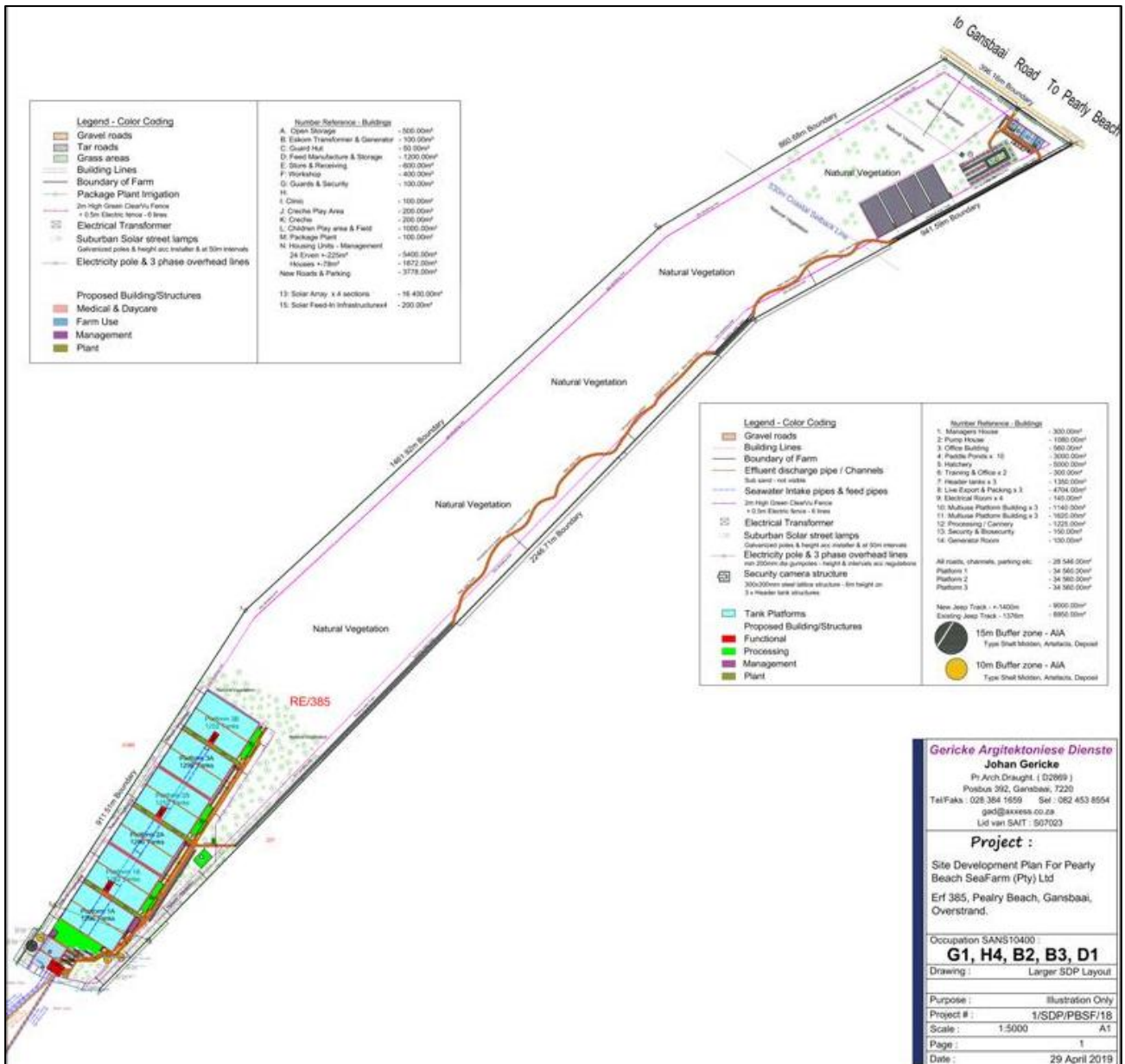


Figure 1. Image showing proposed layout of the Pearly Beach Abalone Farm, Farm 385.



Figure 2. Location of site 1km northwest of Pearly Beach, Overstrand.



Figure 3. Boundary of Farm 355, Pearly Beach, Overstrand.





Figure 4. Contextual image, view to north (Kaplan, 2019).



Figure 6. Contextual image, view to north (Kaplan, 2019).



Figure 5. Contextual image, view to north (Kaplan, 2019).



Figure 7. Contextual image, view to north (Kaplan, 2019).





Figure 8. Contextual image, view to north (Kaplan, 2019).



Figure 10. Contextual image, view to south (Kaplan, 2019).



Figure 9. Contextual image, view to south (Kaplan, 2019).

### **3. APPROACH TO THE STUDY**

#### **3.1. Methodology**

The purpose of the study is to assess the sensitivity of archaeological resources in the study area, to determine the potential impacts on such resources, and to avoid and/or minimize such impacts by means of management and/or mitigation measures.

The significance of archaeological resources was assessed in terms of their content and context. Attributes considered in determining significance include artefact type, rarity of finds, potential for future research, density of finds and the context in which archaeological traces occur.

A field assessment was undertaken by Jonathan Kaplan on 17 January 2019. Heritage resources identified in the field were recorded, mapped and photographed where appropriate. Tracks and waypoints were recorded on a handheld GPS device (map datum WGS 84)) and photographs were taken with a digital camera. Maps and overlays were created for the report by Katie Smuts using Google Earth and QGIS.

A literature survey was carried out to assess the heritage context surrounding the proposed development site. This work comprised a review of previous work conducted in the immediate area. These reports are freely accessible on the South African Heritage Resources Information System (SAHRIS) and covered work done in the area between 2010 and 2017. This information is, therefore, recent and up to date. While some reports are more comprehensive than others, all were found to be of very high quality.

#### **3.2. Restrictions and Limitations**

- The frontal coastal dunes are infested with alien Rooikrantz, while the back dune area is under dense growth of indigenous vegetation and grass cover, resulting in very low archaeological visibility.

#### **3.3. Identifications of Potential Risks**

- Potentially important archaeological resources may be impacted by proposed development activities.
- Unmarked Khoesan burials and ostrich eggshell water flask caches, for example, may be uncovered/exposed/intercepted during bulk earthworks (e.g. building foundations), and excavations for services (e.g. intake & discharge pipelines).

#### **3.4. Gradings**

The grading of sites is stipulated in Section 7 of the National Heritage Resources Act (NHRA) in order that the appropriate level of management can be accorded to sites. SAHRA is the managing authority for all Grade I national sites, the Provincial Heritage Resources Agencies (PHRAs) are the

managing authorities for all Grade II or provincial sites, while Grade III or local sites are intended for management by the local authorities.

Sites identified in this survey are graded in terms of HWC grading systems (2016a), which divide sites of local significance, i.e. Grade III sites, into:

Grades IIIA – high local significance;

Grade IIIB – medium local significance;

Grade IIIC – low local significance; and

Not Conservation Worthy (NCW) – little to no significance and not requiring mitigation.

#### **4. ARCHAEOLOGICAL BACKGROUND AND CONTEXT**

Large numbers of archaeological sites have been documented in the Pearly Beach region, several of these by the author (Avery 1974, 1976; Hart & Halkett 2010; Kaplan 2005, 2001, 2000, 1993; Rudner 1968). The local rocky shorelines acted as foci that attracted Later Stone Age (LSA) hunter-gatherer-foragers as it offered greater opportunities for the exploitation of marine foods, particularly shellfish.

The sites associated with this activity have been shown to be restricted to within approximately 300m of the shoreline (Avery, 1974, 1976). Beyond 300m, only very marginal traces are to be found, although this does depend on the topography of the shoreline. Long sandy beaches tend to be devoid of the shell middens customarily found along rocky shorelines.

Several excavations and sampling of archaeological deposits have been undertaken in Pearly Beach. A Perlemoen-rich midden at Pearly Beach produced a date of 1450 BP (G. Avery, pers. comm. 2005). Avery (1976) suggested that the large Perlemoen-rich middens at Pearly Beach represented processing or 'transit' sites, where large volumes of Perlemoen were collected at low spring tides, when *Haliotis* could be reached. The shellfish represented the optimum resource because of its size. Avery (1976) further argued that shellfish meat was prepared mainly for bulk drying, and then transported to inland sites for storage and consumption.

Shovel testing of archaeological deposits at Erf 1679 Pearly Beach generated traces of subsurface shellfish deposits, including a few cultural remains such as stone tools, bone and several pieces of ostrich eggshell (Kaplan 2001).

An overview of the distribution of sites within 15km of the proposed development area clearly shows the clustering of archaeological sites along the rocky coastline, and also reveals the relative paucity of known archaeological sites from the inland areas in this region (Figure 11 and Annexure 1). This mapped data correlates with the observed spatial distribution of archaeological material associated with shell middens, which tends to be restricted to within 300m of the coastline (Avery, 1976).



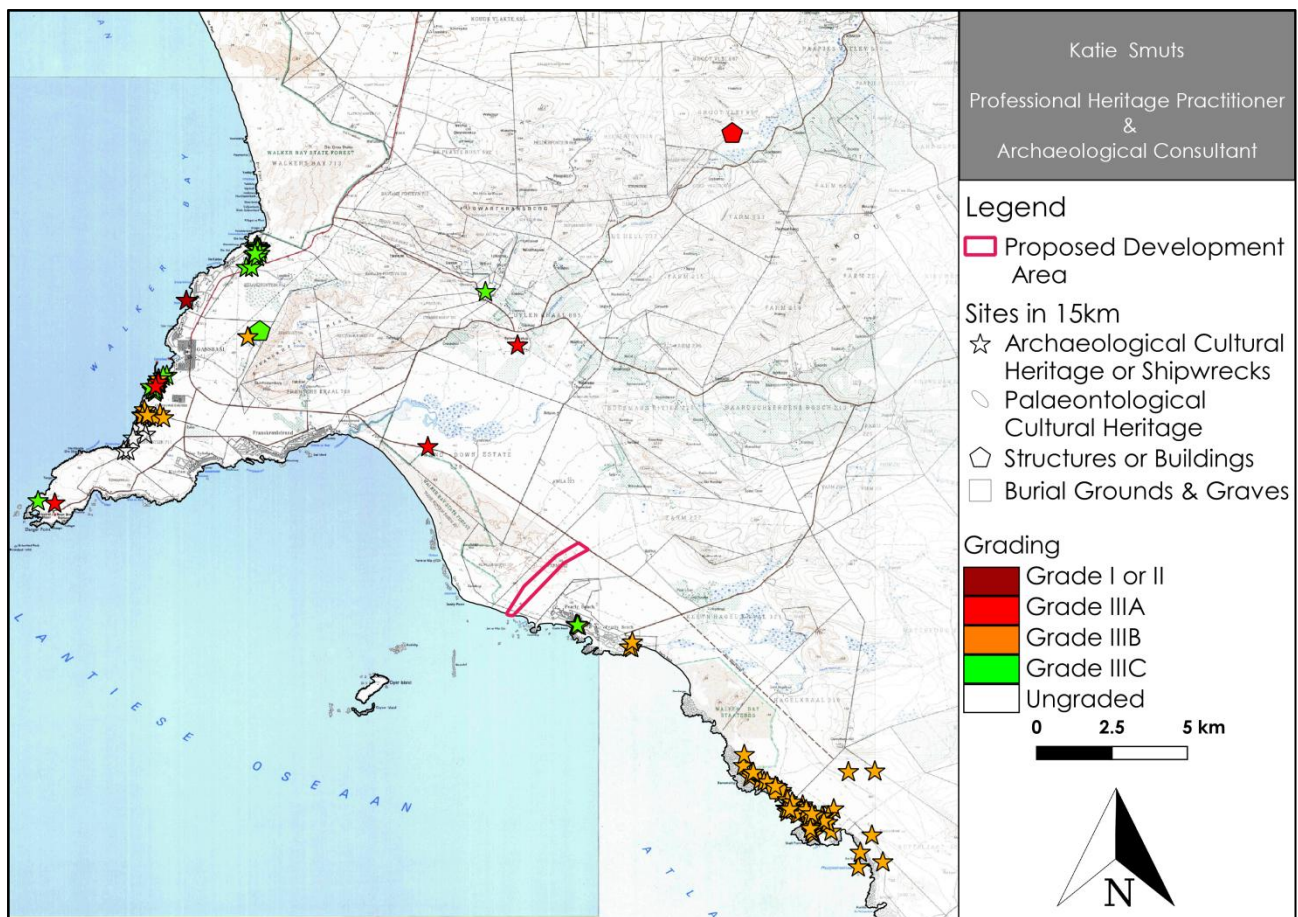


Figure 11. Distribution map of known sites within 15km of the proposed development area.

Within the immediate vicinity, 5kms from the project area, known sites are restricted to shell middens and artefactual remains identified in the course of archaeological surveys of Pearly Beach (Table 1 and Figure 12).

Table 1. Known sites within 5kms of the project area<sup>1</sup>

Site ID	Site number	Site name	Site Type	Grading
19272	PEARLY332-4	Pearly Beach Erf 332 - 4	Artefacts, Shell Midden	IIIB
19266	PEARLY1	Pearly Beach 1	Artefacts, Shell Midden	IIIB
19267	PEARLY2	Pearly Beach 2	Artefacts, Shell Midden	IIb
19268	PEARLY3	Pearly Beach 3	Artefacts, Shell Midden	IIIB
19271	PEARLY332-3	Pearly Beach Erf 332 - 3	Artefacts, Shell Midden	IIc
19269	PEARLY332-1	Pearly Beach Erf 332 - 1	Shell Midden	IIIC
19270	PEARLY332-2	Pearly Beach Erf 332 - 2	Shell Midden	IIIC

<sup>1</sup> Gradings in this table and subsequent sites tables include ratified and proposed gradings.



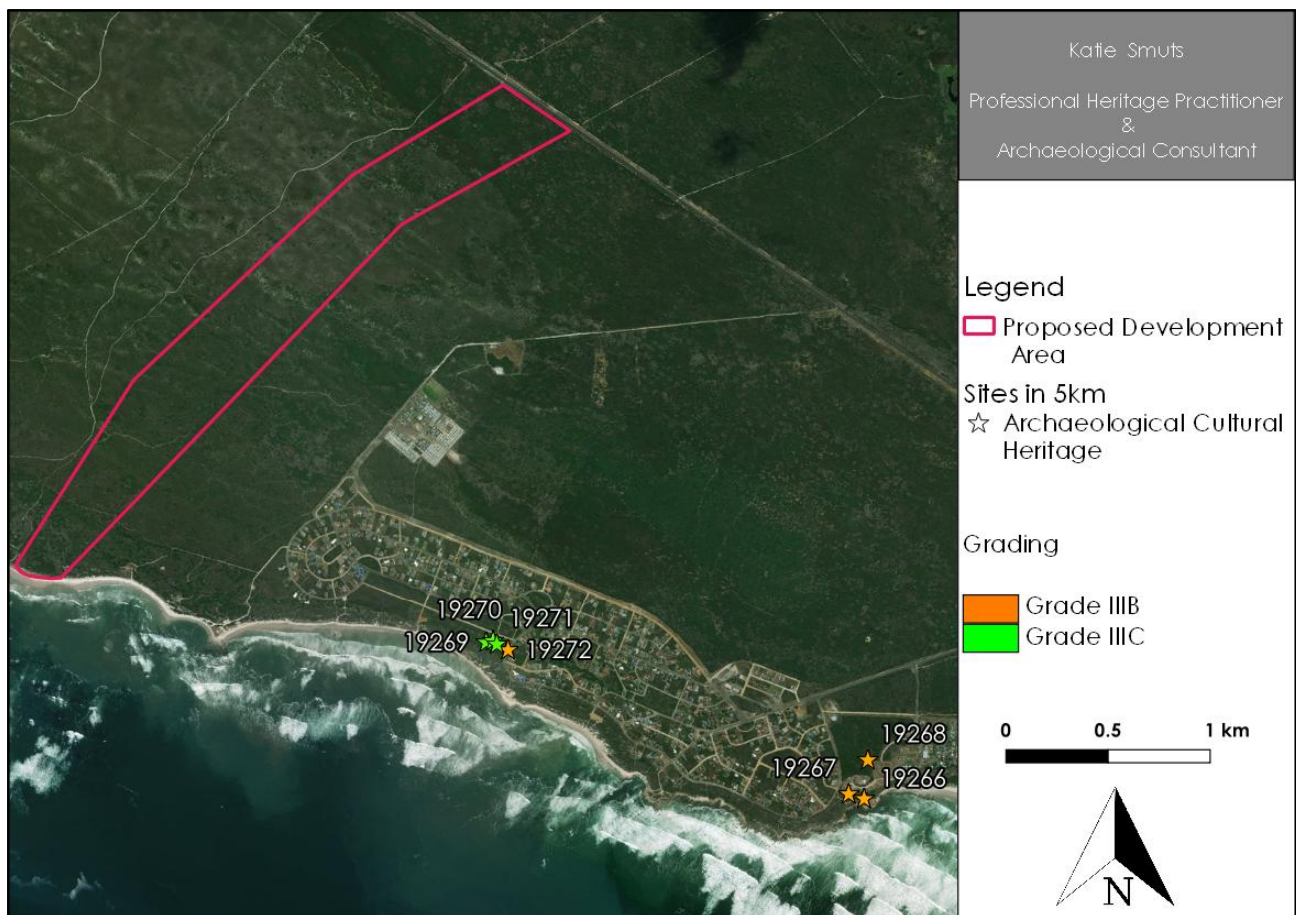


Figure 12. Map of sites within 5kms of the proposed development site, showing clustering of sites along shoreline. All sites are shell middens with or without recorded artefactual remains. See Table 1 for SAHRIS SiteIDs.

## 5. DESCRIPTION OF HERITAGE RESOURCES / PROJECT RESULTS

Overall, there were no constraints or limitations associated with the study. Infestation of the frontal dune area with alien vegetation, and dense occurrences of natural vegetation along the back dunes did limit mobility and visibility in those areas. The north eastern extent of site adjacent to the R43 was not surveyed due to the dense vegetation cover there and the general lack of archaeological resources found at that distance from shoreline in this region. As such, survey was restricted to the area within approximately 950m from the shoreline (Figure 21 to Figure 23).

Table 2. Sites identified during field survey of Farm 385

Site Number	Site Description	Site Type	Grading	Location	Mitigation Proposed
PBAF 213	Scattered fragments of weathered marine shellfish, including <i>Turbo sarmaticus</i> , <i>operculum</i> and adiaagnostic limpets on a wind eroded cobble bed in the back dune area – <u>outside</u> the footprint area. A few quartzite flakes and broken/smashed cobbles. No pottery, OES or bone	Shell Midden, Artefacts	Low (IIIC)	S34°39.582' E19°28.193'	None required
PBAF 313	4 fragments of wind blasted, thin walled, coarse tempered, unburnished, undecorated pot sherds (from	Artefacts, Shell	Low (IIIC)	S34°39.574' E19°28.162'	None required

	a single vessel), and a quartzite cortex flake on a small patch of soft white sand. A thin scatter of weathered fragments of shellfish, inc. <i>T. sarmaticus</i> , <i>operculum</i> & a few whelks, in a small footpath, at the bottom of a dune slope a few meters away.	Midden			
PBAF 413	Scattered fragments of weathered & fragmented shellfish, including <i>T. sarmaticus</i> , <i>Operculum</i> , and several quartzite cobble flakes and chunks on a shallow dune slope in the back dune area, <u>outside</u> the footprint area	Shell Midden, Artefacts	Low (IIIC)	S34°39.590' E19°28.160'	None required
PBAF 512	Relatively well-preserved shell midden deposits occur on a steep, east-facing, vegetated dune slope, in the back dune area. Comprising mostly fragmented shellfish ( <i>T. Sarmaticus</i> & <i>operculum</i> ), but also some larger fragments and smaller, whole limpets ( <i>Scutellastra tabularis</i> ), and a few small whelk. Also some burnt shell. Several quartzite flakes & chunks, but no pottery or OES found	Shell Midden, Deposit, Artefacts	Medium (IIB)	S34°39.579' E19°28.146'	Test excavations and/or sampling of deposits to be undertaken. Alternatively 10m buffer around the site
PBAF 612	Comprises a small patch, of relatively well-preserved shellfish deposits dominated by <i>T. sarmaticus</i> , <i>Operculum</i> , and <i>Cymbula oculus</i> and some burnt shell, on a south east facing dune slope in the back dune area, surrounded by dense Rooikrantz. One quartzite cobble flake and a broken/smashed quartzite cobble. Several small, thin patches of weathered and fragmented shellfish also occur on the top and side of the dune. No pottery, bone or OES	Shell Midden, Deposit, Artefacts	Low (IIIC) to Medium (IIB)	S34°39.583' E19°28.123'	Test excavations and/or sampling of deposits to be undertaken. Alternatively 10m buffer around the site
PBAF 712	Comprises a thin, dispersed and disturbed/trampled scatter of fragmented shellfish in small footpath. One large <i>S. argenvillei</i> , and some <i>T. sarmaticus</i> , and <i>Operculum</i> . One quartzite chunk	Shell Midden, Artefacts	Low (IIIC)	S34°39.580' E19°28.107'	None required
PBAF 812	Isolated and scattered fragments of fragmented and weathered shellfish and a few quartzite flakes and chunks, on an expansive bed of wind eroded surface calcrete	Shell Midden, Artefacts	Low (IIIC)	S34°39.533' E19°28.042'	None required
PBAF 912	Dispersed scatter of fragmented and weathered shellfish on an exposed bed of wind eroded beach cobbles, behind a cobble terrace in the back dune area, surrounded by dense alien Rooikrantz. Shellfish comprises mainly <i>T. sarmaticus</i> , but some limpet (including <i>S. argenvillei</i> ) also occurs. 1 quartzite flake and one possible quartzite hammerstone. No pottery, bone or OES	Shell Midden, Artefacts	Low (IIIC)	S34°39.570' E19°28.001'	None required
PBAF 1012	Well preserved shell midden deposits recorded on a prominent, very visible dune mound. Shellfish comprises mostly fragmented and weathered shellfish, but larger pieces, and some whole shell also occur.	Shell Midden, Deposit, Artefacts	Medium (IIB)	S34°39.551' E19°28.005'	Test excavations and/or sampling of deposits to be undertaken.

	Shellfish is dominated by <i>T. sarmaticus</i> , with large and smaller <i>Operculum</i> , a diagnostic limpet, but also <i>S. Argenvillei</i> & <i>S. longicosta</i> , small whelk, large fragments of Perlemoen ( <i>Haliotis sp</i> ) and periwinkle ( <i>D. sinensis</i> ). Many unmodified quartzite pebbles, large round cobbles, small number of quartzite flakes, inc. 1 hammerstone, 2 misc. upper grindstones, 1 broken, double sided upper grindstone				Alternatively 10m buffer around the site
PBAF 1612	Well preserved shell midden deposits on exposed, north facing dune slope, about 50m south of Site 1012 in back dune area, surrounded by dense Rooikrantz. Weathered shellfish is dominated by <i>T. sarmaticus</i> , <i>Operculum</i> , & a diagnostic limpets. Some burnt shellfish also noted. Relatively large number of quartzite flakes, chunks, broken/smashed cobbles, 1 hammerstone, 3 upper grindstones, 1 misc. grindstone fragment, 1 quartz core, and quartz chunks/flakes, many small unworked pebbles. No pottery, bone or OES found.	Shell Midden, Deposit, Artefacts	Medium (IIB)	S34°39.563' E19°27.990'	Test excavations and/or sampling of deposits to be undertaken. Alternatively 15m buffer around the site

### 5.1. Resources Identified

Several Later Stone Age sites were identified in the course of the archaeological survey (Figure 13 to Figure 20). Predominantly these sites comprised shell middens of varying degrees of intactness. Four well preserved middens (Sites PBAF512, PBAF612, PBAF1012 and PBAF1612), exhibited whole and fragmentary shellfish, including *T. Sarmaticus* & *operculum*, *Scutellastra tabularis*, *Cymbula oculus*, *S. Argenvillei* & *S. Longicosta* and *Haliotis sp*. In addition to the shellfish remains, these sites variously contained quartzite cobbles, flakes and chunks. Sites PBAF1012 and PBAF1016 also contained hammerstones and upper grindstones. The remaining six less well preserved sites generally comprised only ephemeral and dispersed scatters of shellfish with occasional stone tool occurrences. No bone or ostrich egg shell beads were noted at any of the sites, and indigenous pottery was only recorded at one site (PBAF313; Figure 14).

The proposed development area contained no evidence for historical archaeological remains, or structures. There were similarly no graves or burial grounds identified on the site.





*Figure 13. PBAF213, outside the development area (Kaplan, 2019).*



*Figure 15. PBAF512, on an east facing slope (Kaplan, 2019).*



*Figure 14. Thin walled, coarse tempered, unburnished, undecorated pot sherds (from a single vessel) recorded at PBAF313 (Kaplan, 2019).*



*Figure 16. North facing aspect of PBAF1012 (Kaplan, 2019).*





*Figure 17. West facing aspect of PBAF1012 dune mound (Kaplan, 2019).*



*Figure 19. PBAF1612 on an east facing slope (Kaplan, 2019).*



*Figure 18. Detail of PBAF1012 on prominent dune mound (Kaplan, 2019).*



*Figure 20. Detail of PBAF1612 (Kaplan, 2019).*

## 5.2. Impacts to Heritage Resources

Due to the changed layout of the proposed facility, which avoids the important archaeological sites identified (e. g. Sites PBAF512, PBAF 612, PBAF 1012 & PBAF 1612) development activities are unlikely to impact negatively on the resources (Figure 24 and Figure 25).

Unmarked Khoisan graves may be exposed or intercepted during bulk earthworks and excavations for services.

The impact significance of the proposed development on archaeological resources is therefore rated as being **very low to low**. These impacts will be likely during the construction phase. The operational and decommissioning phases should have minimal impacts to the archaeological resources of the sites, although pedestrian and vehicle traffic could negatively impact the sites due to their proximity to the farming infrastructure and activities.

### 5.2.1. Construction Phase

Direct impacts to **archaeological resources**, including as yet unidentified burial grounds and graves may result from construction vehicles in the study area, the building of roads, clearing of land, earthmoving, and similar activities related to construction. Given the prevalence of Stone Age material along the shoreline where the bulk of the infrastructure is to be located, the impact significance to Stone Age archaeology is likely to be **Medium-High** before mitigation. With the mitigation indicated in Table 2, these impacts will be reduced to **Low**.

### 5.2.2. Operational Phase

Impacts to **archaeological resources** are possible during the operational phase, as, although no new areas will be disturbed through operational activities, the conserved sites are in very close proximity to the infrastructure and related activities. The impact significance without mitigation would, therefore be **moderate**. Mitigation should be to ensure that the sites are fenced off and the buffer zones observed throughout the operational lifespan of the facility. Further, only existing roads should be used and no previously undisturbed areas should be subject to disturbance. With mitigation, impact will be **very low**.

### 5.2.3. Decommissioning Phase

Impacts to **archaeological resources** are possible during the decommissioning phase, as, although no new areas will be disturbed through decommissioning activities, the conservation of the sites makes them vulnerable during any activities on site. The impact significance without mitigation would, therefore be **moderate**. Mitigation should be to ensure that the sites remain fenced off and the buffer zones observed throughout the decommissioning phase of the facility. Further, only existing roads should be used and no previously undisturbed areas should be subject to disturbance. With mitigation, impacts will be **very low**.

#### 5.2.4. Cumulative Impacts

Cumulative impacts to coastal archaeology are **high** across the Overstrand Municipality where rampant development along the coastline has seen the loss of numerous sites across the wider area. The region to the east of this site, under the expanding settlement of Pearly Beach, has already seen extensive impacts to archaeological sites. As such, this development expands the footprint of this impacted area. However, these impacts are necessarily curtailed by the presence of several coastal nature reserves along this coastline, including Uilkraalsmond Nature Reserve to the north and Pearly Beach Nature Reserve to the south, which serve to protect many of the shell middens and other archaeological features. Further to this, the retention and preservation *in situ* of the significant sites in this instance reduces the overall impact of developments in this area.

#### 5.2.5. Indirect Impacts

Indirect impacts occur through loss of sense of place and negative impacts to the cultural landscape and heritage resources within it. Where these contextual impacts arise, they are experienced during all phases, but are most problematic during the operational phase. In this instance, it is likely that indirect impacts will be **low**, given the location of this development adjacent to the edge of the built up settlement of Pearly Beach.

### 5.3. Mitigation

The following mitigatory measures were recommended following the field assessment:

- Site PBAF512: Test excavations and/or sampling of deposits to be undertaken. Alternatively 10m buffer around the site.
- Site PBAF612: Test excavations and/or sampling of deposits to be undertaken. Alternatively 10m buffer around the site.
- Site PBAF1012: Test excavations and/or sampling of deposits to be undertaken. Alternatively 10m buffer around the site.
- Site PBAF1612: Test excavations and/or sampling of deposits to be undertaken. Alternatively 15m buffer around the site

The change to the proposed layout means that excavation and/or sampling of deposits is not necessary, but the buffers should be observed and the sites fenced off in each instance.



## 5.4. Mapping of Resources

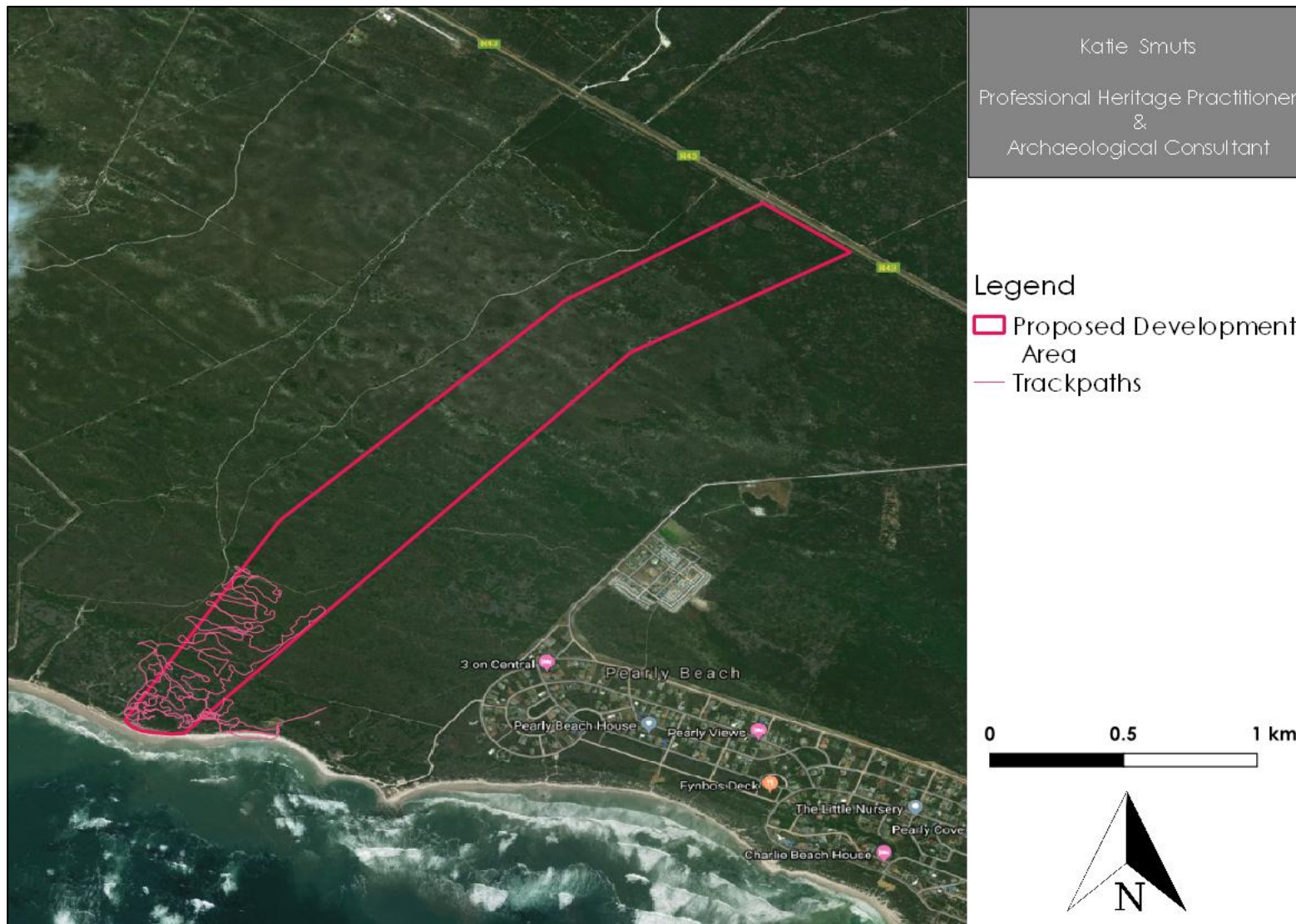


Figure 21. Map showing area surveyed relative to greater project area. Surveyed area extends c. 950m from the high tide line.



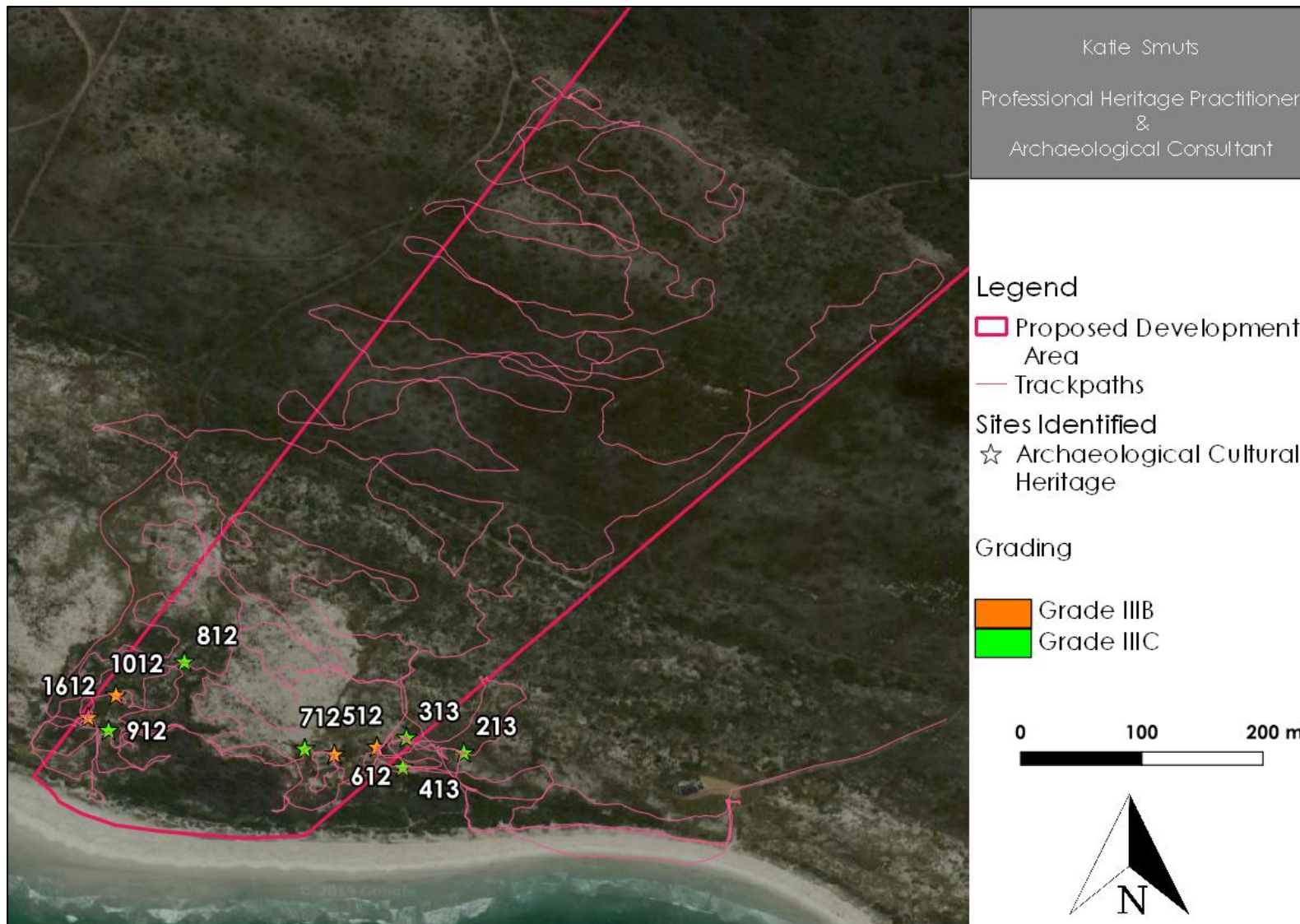


Figure 22. Trackpaths and sites identified during field survey. All Grade IIIB sites are proposed for mitigation by excavation or avoidance by means of buffers of either 10 or 15m.

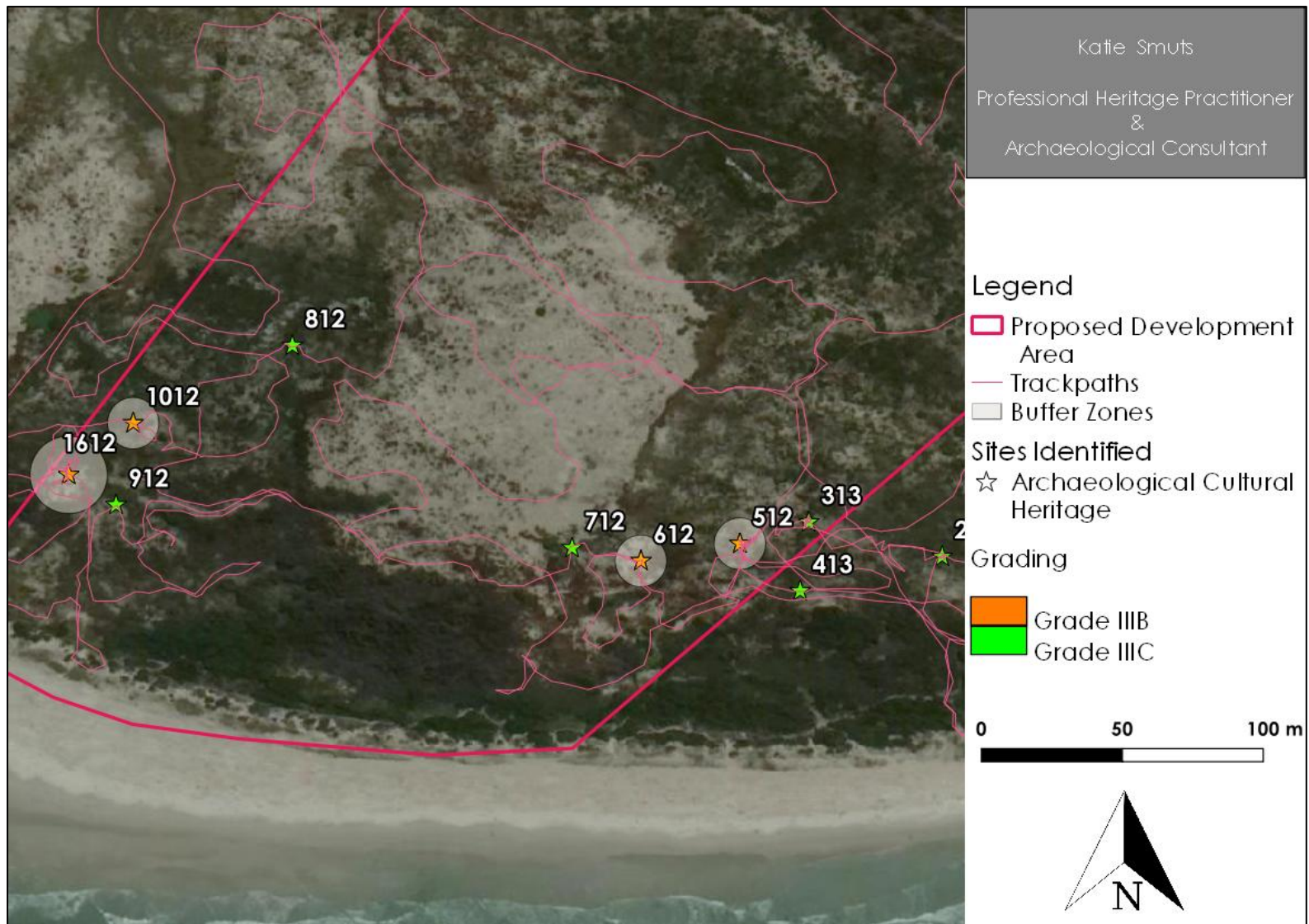


Figure 23. Detail of sites with the recommended buffers indicated around the Grade IIIB sites. Sites PBAF512, 612 and 1012 have recommended buffers of 10m, while PBAF1612 has a recommended buffer of 15m.



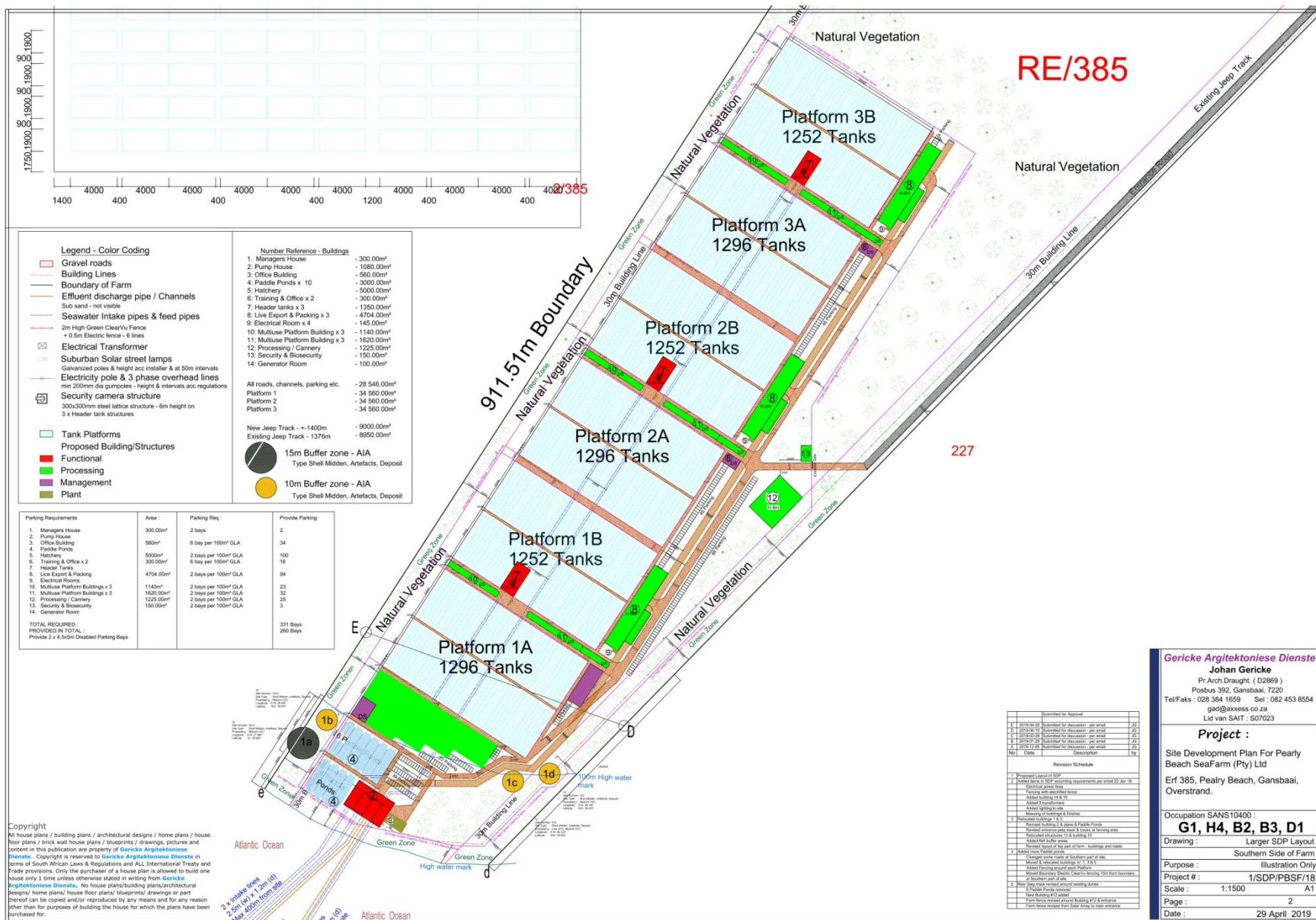


Figure 24. SDP showing significant sites relative to facility layout, note avoidance of all buffered areas by infrastructure (Geriëcke, 2019).





## 6. STATEMENT OF SIGNIFICANCE

Section 38(3)b of the NHRA requires an assessment of the significance of heritage resources identified in surveys such as this. This task is mediated by Section 2(vi) of the NHRA, as well as by HWC (2016a, 2016b) and SAHRA (2007) guidelines. Significance in terms of Section 2(vi) of the NHRA should be assessed with regard to the “aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance” of a resource.

Of the ten sites identified in this survey, four can be considered of medium cultural significance by virtue of their capacity to inform us of the lifeways, food procurement strategies and movements of Later Stone Age people in this area. Together with the sites of low cultural significance, these sites contribute to the wealth of information we are able to derive about the people who inhabited our coastlines and exploited the marine and terrestrial food resources available to them there. While such sites are not rare, their relative ubiquity and their distribution across the extent of the South African coastline enables scientists to derive important information about regional differences and similarities in procurement systems, artefactual industries, movement patterns and other aspect of life in the Holocene.

## 7. CONCLUSIONS AND RECOMMENDATIONS

This assessment has shown that the coastal region of the proposed development site contains, as expected, several archaeological heritage sites, in the form of shell middens of varying densities, and ephemeral shell scatters. While none of these is of very high significance, the better preserved middens (Sites PBAF512, PBAF612, PBAF1012 and PBAF1612), which contain varied stone artefacts and well preserved shellfish remains are of medium significance and warrant protection or mitigation through excavation should they be disturbed or damaged by the proposed development.

In response to these identified sites, the layout of the infrastructure has been revised to ensure that the site buffers are observed. The sites are therefore not deemed to be at risk of damage or disturbance, and mitigation is not required.

### 7.1. Recommendations

The following recommendations are made:

- Sites **PBAF512 (S34°39.579' E19°28.146')**, **PBAF612 (S34°39.583' E19°28.123')** and **PBAF1012 (S34°39.551' E19°28.005')** should be fenced off prior to development activities commencing on site. The erection of the fence is to be undertaken under supervision by an archaeologist. No development related activities are to be permitted, including foot or vehicle traffic, within 10m of the site. This fencing should be maintained in place for the duration of the operational life and decommissioning of the facility.

- Site **PBAF1612 (S34°39.563' E19°27.990')** should be fenced off prior to development activities commencing on site. The erection of the fence is to be undertaken under supervision by an archaeologist. No development related activities are to be permitted, including foot or vehicle traffic, within 15m of the site. This fencing should be maintained in place for the duration of the operational life and decommissioning of the facility.
- Vegetation clearing operations, particularly in the coastal foredunes, must be monitored by a professional archaeologist. If any archaeological deposits are exposed, these might need to shovel tested under a Work Plan permit, to determine the potential significance of the deposits.
- Bulk earthworks (e. g. for water, electricity, sewerage, & intake & discharge pipelines) must be monitored by a professional archaeologist. This can be done in consultation with the Environmental Control Officer (ECO) who must be on site during the Construction Phase of the project. The archaeologist does not need to be on site permanently, but should visit the site at least once a week during the Construction Phase, or when the need arises. If any archaeological deposits are exposed during these activities, these may need to be sampled or excavated to determine the significance of the deposits.
- Excavations for building foundations (e. g. proposed managers house, administration offices, intake & effluent area) must be monitored by a professional archaeologist. If any archaeological deposits are exposed during these activities, these may need to be sampled or excavated to determine the significance of the deposits.
- If any unmarked Khoesan graves are uncovered or exposed during bulk earthworks and excavations, these must immediately be reported to the contracted archaeologist or Heritage Western Cape (Att: Mr Andrew September 021 483 9685). In the case of human burials, these will have to be removed under a permit issued by HWC.

The layout of the proposed facility was adjusted to avoid all significant archaeological sites. As such, no mitigation is required prior to the commencement of development on the site.

It is recommended that the project be authorised, subject to implementation of the above recommendations. These recommendations should be included in the Environmental Management Programme (EMP) and the Environmental Authorisation (EA).

## 8. REFERENCES

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## 9. ANNEXURES

Annexure 1: Table of known sites within 15km of the project area

Site ID	Site number	Site name	Site Type	Grading
32107	Hannington Court-001	Hannington Court	Shipwreck	I
25308	9/2/040/003/12	Die Kelders Cave 1	Archaeological	II
32441	GB1 & GB2	Danger Point	Archaeological	IIIA
37596	BNK	Byneskranskop	Archaeological	IIIA
107980	Byneskranskop 1		Archaeological	IIIA
105122	GB 2	Gansbaai 2	Archaeological	IIIA
127385	WBWEF 687/7	Walker Bay Wind Energy Facility 687/7	Building	IIIA
127399	PBD BP 21L	Proposed Borrowpit Development BP 21L	Burial Grounds & Graves	IIIA
105121	GB 1	Gansbaai 1	Shell Midden	IIIA
38894	NUC023	Nuclear 023	Archaeological	IIIB
38968	NUC038	Nuclear 038	Archaeological	IIIB
39053	NUC058	Nuclear 058	Archaeological	IIIB
39055	NUC059	Nuclear 059	Archaeological	IIIB
39057	NUC060	Nuclear 060	Archaeological	IIIB
39061	NUC062	Nuclear 062	Archaeological	IIIB
39077	NUC066	Nuclear 066	Archaeological	IIIB
39079	NUC067	Nuclear 067	Archaeological	IIIB
38982	NUC041	Nuclear 041	Archaeological	IIIB
38989	NUC043	Nuclear 043	Archaeological	IIIB
39033	NUC050	Nuclear 050	Archaeological	IIIB
39044	NUC054	Nuclear 054	Archaeological	IIIB
38940	NUC031	Nuclear 031	Archaeological	IIIB
38943	NUC032	Nuclear 032	Archaeological	IIIB
38947	NUC033	Nuclear 033	Archaeological	IIIB
38953	NUC034	Nuclear 034	Archaeological	IIIB
38961	NUC036	Nuclear 036	Archaeological	IIIB
38868	NUC016	Nuclear 016	Archaeological	IIIB
38896	NUC024	Nuclear 024	Archaeological	IIIB
38902	NUC026	Nuclear 026	Archaeological	IIIB
38835	NUC014	Nuclear 014	Artefacts	IIIB
17505	GANS210-1	Gansbaai Erf 210 - 1	Artefacts	IIIB



39051	NUC056	Nuclear 056	Artefacts	IIIB
39059	NUC061	Nuclear 061	Artefacts	IIIB
39075	NUC064	Nuclear 064	Artefacts	IIIB
38997	NUC045	Nuclear 045	Artefacts	IIIB
39028	NUC048	Nuclear 048	Artefacts	IIIB
39030	NUC049	Nuclear 049	Artefacts	IIIB
38911	NUC028	Nuclear 028	Artefacts	IIIB
38917	NUC029	Nuclear 029	Artefacts	IIIB
38920	NUC030	Nuclear 030	Artefacts	IIIB
38899	NUC025	Nuclear 025	Artefacts	IIIB
38957	NUC035	Nuclear 035	Artefacts	IIIB
38970	NUC039	Nuclear 039	Artefacts	IIIB
38973	NUC040	Nuclear 040	Artefacts	IIIB
38833	NUC013	Nuclear 013	Artefacts	IIIB
38964	NUC037	Nuclear 037	Artefacts	IIIB
38872	NUC018	Nuclear 018	Artefacts	IIIB
38875	NUC019	Nuclear 019	Artefacts	IIIB
38877	NUC020	Nuclear 020	Artefacts	IIIB
38881	NUC021	Nuclear 021	Artefacts	IIIB
38883	NUC022	Nuclear 022	Artefacts	IIIB
38838	NUC015	Nuclear 015	Artefacts	IIIB
38987	NUC042	Nuclear 042	Artefacts, Deposit	IIIB
38870	NUC017	Nuclear 017	Artefacts, Deposit	IIIB
19267	PEARLY2	Pearly Beach 2	Artefacts, Shell Midden	IIIB
19268	PEARLY3	Pearly Beach 3	Artefacts, Shell Midden	IIIB
18271	KLIPF4	Klipfonteyn 711 - 4	Artefacts, Shell Midden	IIIB
19272	PEARLY332-4	Pearly Beach Erf 332 - 4	Artefacts, Shell Midden	IIIB
17506	GANS623-1	Gansbaai Erf 623 - 1	Artefacts, Shell Midden	IIIB
38999	NUC046	Nuclear 046	Artefacts, Shell Midden	IIIB
39025	NUC047	Nuclear 047	Artefacts, Shell Midden	IIIB
34524	KLIPF7	Klipfonteyn 711 - 7	Artefacts, Shell Midden	IIIB
34525	KLIPF8	Klipfonteyn 711 - 8	Artefacts, Shell Midden	IIIB
18272	KLIPF5	Klipfonteyn 711 - 5	Artefacts, Shell Midden	IIIB
19266	PEARLY1	Pearly Beach 1	Artefacts, Shell Midden	IIIB

39093	NUC073	Nuclear 073	Deposit, Artefacts	IIIB
38830	NUC012	Nuclear 012	Palaeontological	IIIB
18269	KLIPF2	Klipfonteyn 711 - 2	Shell Midden	IIIB
127388	EAO M1	Expansion of an Aquaculture Operation M1	Shell Midden	IIIB
127389	EAO M2	Expansion of an Aquaculture Operation M2	Shell Midden	IIIB
18268	KLIPF1	Klipfonteyn 711 - 1	Shell Midden	IIIB
39076	NUC065	Nuclear 065	Shell Midden	IIIB
39080	NUC068	Nuclear 068	Shell Midden	IIIB
39081	NUC069	Nuclear 069	Shell Midden	IIIB
39083	NUC071	Nuclear 071	Shell Midden	IIIB
39089	NUC072	Nuclear 072	Shell Midden	IIIB
39046	NUC055	Nuclear 055	Shell Midden	IIIB
34527	KLIPF9	Klipfonteyn 711 - 9	Shell Midden	IIIB
38995	NUC044	Nuclear 044	Shell Midden	IIIB
127390	EAO M3	Expansion of an Aquaculture Operation M3	Shell Midden	IIIB
127391	EAO M4	Expansion of an Aquaculture Operation M4	Shell Midden	IIIB
39063	NUC063	Nuclear 063	Shell Midden	IIIB
39086	NUC070	Nuclear 070	Shell Midden	IIIB
18270	KLIPF3	Klipfonteyn 711 - 3	Shell Midden	IIIB
18273	KLIPF6	Klipfonteyn 711 - 6	Shell Midden	IIIB
39036	NUC051	Nuclear 051	Shell Midden, Artefacts	IIIB
39039	NUC052	Nuclear 052	Shell Midden, Artefacts	IIIB
39042	NUC053	Nuclear 053	Shell Midden, Artefacts	IIIB
39047	NUC057	Nuclear 057	Shipwreck	IIIB
38908	NUC027	Nuclear 027	Structures	IIIB
127381	KBDLF 751	Khoisan Bay Development Langbosch Farm 751	Archaeological	IIIC
127363	KBDLF 733	Khoisan Bay Development Langbosch Farm 733	Archaeological	IIIC
127364	KBDLF 734	Khoisan Bay Development Langbosch Farm 734	Archaeological	IIIC
127365	KBDLF 735	Khoisan Bay Development Langbosch Farm 735	Archaeological	IIIC
32440	I&JA-001	Irvine and Johnson Abalone	Archaeological	IIIC
32395	IJA-001	Irvine and Johnson Abalone Farm	Archaeological	IIIC
34037	GNBC2	Gansbaai Commonage 2	Artefacts	IIIC
19357	PLBOS701-1	Platbos 701 - 1	Artefacts	IIIC
34007	GB629/1	Gansbaai Bredasdorp 629/1	Artefacts	IIIC

34009	GB629/2	Gansbaai Bredasdorp 629/2	Artefacts	IIIC
17523	GANS623-8	Gansbaai Erf 623 - 8	Artefacts, Shell Midden	IIIC
17507	GANS623-10	Gansbaai Erf 623 - 10	Artefacts, Shell Midden	IIIC
17508	GANS623-11	Gansbaai Erf 623 - 11	Artefacts, Shell Midden	IIIC
17509	GANS623-12	Gansbaai Erf 623 - 12	Artefacts, Shell Midden	IIIC
17510	GANS623-13	Gansbaai Erf 623 - 13	Artefacts, Shell Midden	IIIC
17511	GANS623-14	Gansbaai Erf 623 - 14	Artefacts, Shell Midden	IIIC
17512	GANS623-15	Gansbaai Erf 623 - 15	Artefacts, Shell Midden	IIIC
17513	GANS623-16	Gansbaai Erf 623 - 16	Artefacts, Shell Midden	IIIC
19271	PEARLY332-3	Pearly Beach Erf 332 - 3	Artefacts, Shell Midden	IIIC
17514	GANS623-17	Gansbaai Erf 623 - 17	Artefacts, Shell Midden	IIIC
17515	GANS623-18	Gansbaai Erf 623 - 18	Artefacts, Shell Midden	IIIC
17516	GANS623-19	Gansbaai Erf 623 - 19	Artefacts, Shell Midden	IIIC
17517	GANS623-2	Gansbaai Erf 623 - 2	Artefacts, Shell Midden	IIIC
17518	GANS623-3	Gansbaai Erf 623 - 3	Artefacts, Shell Midden	IIIC
17519	GANS623-4	Gansbaai Erf 623 - 4	Artefacts, Shell Midden	IIIC
17520	GANS623-5	Gansbaai Erf 623 - 5	Artefacts, Shell Midden	IIIC
17521	GANS623-6	Gansbaai Erf 623 - 6	Artefacts, Shell Midden	IIIC
17522	GANS623-7	Gansbaai Erf 623 - 7	Artefacts, Shell Midden	IIIC
17524	GANS623-9	Gansbaai Erf 623 - 9	Artefacts, Shell Midden	IIIC
127367	KBDLF 737	Khoisan Bay Development Langbosch Farm 737	Shell Midden	IIIC
127369	KBDLF 738	Khoisan Bay Development Langbosch Farm 738	Shell Midden	IIIC
127370	KBDLF 739	Khoisan Bay Development Langbosch Farm 739	Shell Midden	IIIC
127371	KBDLF 740	Khoisan Bay Development Langbosch Farm 740	Shell Midden	IIIC
127372	KBDLF 741	Khoisan Bay Development Langbosch Farm 741	Shell Midden	IIIC
127374	KBDLF 742	Khoisan Bay Development Langbosch Farm 742	Shell Midden	IIIC
127375	KBDLF 743	Khoisan Bay Development Langbosch Farm 743	Shell Midden	IIIC
127376	KBDLF 744	Khoisan Bay Development Langbosch Farm 744	Shell Midden	IIIC
127377	KBDLF 745	Khoisan Bay Development Langbosch Farm 745	Shell Midden	IIIC
127378	KBDLF 746	Khoisan Bay Development Langbosch Farm 746	Shell Midden	IIIC
127379	KBDLF 748	Khoisan Bay Development Langbosch Farm 748	Shell Midden	IIIC
127380	KBDLF 750	Khoisan Bay Development Langbosch Farm 750	Shell Midden	IIIC
19269	PEARLY332-1	Pearly Beach Erf 332 - 1	Shell Midden	IIIC
19270	PEARLY332-2	Pearly Beach Erf 332 - 2	Shell Midden	IIIC

127366	KBDLF 736	Khoisan Bay Development Langbosch Farm 736	Shell Midden	IIIC
34036	GNBC1	Gansbaai Commonage 1	Structures	IIIC
19703	ROM1	Romansbaai 1	Shell Midden	Ungraded
19704	ROM10	Romansbaai 10	Shell Midden	Ungraded
19705	ROM14	Romansbaai 14	Shell Midden	Ungraded
19706	ROM15	Romansbaai 15	Shell Midden	Ungraded
19707	ROM9	Romansbaai 9	Shell Midden	Ungraded