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ATT: DR. ANTONIETA JERARDINO
South African Heritage Resources Agency: Archaeology, Palaeontology & Meteorites Unit (SAHRA APM)
Tel : 021 462 4505
Fax : 021 462 4509
Postal address : P.O. Box4637, Cape Town, 8000
E-mail : ajerardino@sahra.org.za

RE: LETTER OF RECOMMENDATION
Exemption from a Phase 1 Archaeological Impact Assessment (AIA) for the beachfront adjoining the Cove Rock Golf Estate and the Hotel & Conference Centre Development, Cove Rock, East London, Eastern Cape, South Africa

o INTRODUCTION: BACKGROUND TO THE 2 PROPOSED DEVELOPMENTS AND RELATED HERITAGE COMPLIANCE

The developer, Southern Palace Investment 414 (Pty) Ltd, is intending to develop the approximate 170ha Cove Rock Golf Estate (Farms 988/2, 988/3, 989/1, 990, 991, 991/1, 992/1, 992/2, 993, 1214/2, 1214/3, 1335 and 1348) and the approximate 16.5ha Hotel & Conference Centre (Farm 992/2) in the Cove Rock area of East London, Eastern Cape, South Africa. Phase 1 Archaeological Impact Assessment (AIA) reports on both developments were included as sub-sections to the Environmental Impact Assessments (EIA) of the developments by the appointed environmental consultancy, BESC (Biotechnology & Environmental Specialist Consultancy), namely:

1. Phase 1 Archaeological Impact Assessment - Cove Rock Golf Estate, Cove Rock, East London, Eastern Cape, South Africa (ArchaeoMaps - 2008-05-21); and
2. Phase 1 Archaeological Impact Assessment - Hotel & Conference Centre Development, Portion 2 of Farm 992, Cove Rock, East London, Eastern Cape, South Africa (ArchaeoMaps - 2008-06-04).

One cultural heritage resource was identified and reported on in the Cove Rock Golf Estate study site and four in the Hotel & Conference Centre Development area. All heritage resources comprised of Historical Period structures. Recommendations towards either their conservation or destruction were included in the Phase 1 AIA reports, submitted to the SAHRA APM Unit.

Two SAHRA APM Unit 'Archaeological Review Comments' refer:

1. SAHRA Archaeological Review Comment - Cove Rock Golf Estate, Cove Rock, East London, Eastern Cape: SAHRA file nr 9/2/026/0003; and
2. SAHRA Archaeological Review Comment - Hotel & Conference Centre Development, Cove Rock, East London, Eastern Cape: SAHRA file nr 9/2/026/0001.

o SAHRA APM UNIT REQUIREMENTS - THE REQUESTED PHASE 1 AIA FOR THE BEACHFRONT ADJOINING THE PROPOSED DEVELOPMENTS

Both SAHRA APM Unit review comments accepted the findings of the Phase 1 AIA reports with decisions regarding the identified Historical Period structures referred to the Eastern Cape Provincial Heritage Resources Agency's (EC PHRA) Built Environment Section. The review comments made provision for unidentified archaeological resources, including human burials, that may be encountered during the course of development. Palaeontological monitoring at the time of development was also prescribed.

In addition to the above requirements the SAHRA APM Unit requested that '...if access to the beachfront will form part of the various attractions offered by *the* proposed *developments*, a Phase 1 AIA will need to be conducted along this stretch of coastline in order to determine the possible existence of heritage resources that may be affected as a result of *the development*.' The SAHRA APM Unit request was based on the fact that no indication was given in either of the Phase 1 AIA reports that the survey extended to the beachfront (SAHRA file nrs 9/2/026/001 & 9/2/026/003). Despite not forming a direct part of the proposed development area the request was based on the fact that it may well be assumed that the development will be a direct cause of increased impact that will spill-over to the neighbouring land / beachfront. The requested Phase 1 was to be to the cost of the developer, following the SAHRA principle that 'the polluter pays' i.e. if a development, construction or operational phase, will impact on adjacent land, which could be public land, it is the developer's responsibility to make sure that the impacts are mitigated (Pers comm.: Jerardino 2008-09-01).

It has been confirmed by BESC that residents will in fact be given access to the beachfront (Pers comm.: Sewruttan 2008-08-21), and particularly along the pathway assessed and included in the Hotel & Conference Centre Development Phase 1 AIA.



Figure 1: Locality of the proposed Cove Rock Golf Estate and the Hotel & Conference Centre Development areas in relation to Cove Rock and the assessed portion of the beachfront (red diagonal lines)

The Hotel and Conference Centre Phase 1 AIA in fact included an assessment of the beachfront restricted to the area immediately south east (SE) of the proposed development (2008-08-18). Assessment of the beachfront was primarily based on:

1. Proximity of the beachfront to the proposed development area and known heritage sensitivity of beachfront areas as have been encountered in KwaZulu-Natal by myself and a few months prior to the assessment more formally discussed, particularly in relation to Eastern Cape sites, with Dr. Johan Binneman of the Albany Museum, Grahamstown; and
2. Information provided by Ross, the only resident of the former Umtiza tourist accommodation. Ross provided not only access to the proposed Hotel and Conference Centre Development area for the purposes of the Phase 1 assessment but also information on the age of structures etc. In addition he commented on a number of artefacts in his possession, given to him years ago by a friend who picked it up from a site near Kayser's

Beach, approximately 20km south of Cove Rock. He was aware of a number of sites including the one with the 'tusk' from Kayser's Beach, now in his possession, and other 'cooking sites' where ceramic, charcoal and sometimes bones and shell were found in conjunction with one another. To Ross' knowledge no artefacts have been uncovered from the beachfront adjoining the proposed development area. All sites known to him were located south of Cove Rock in the region of Kayser's Beach and further south along the coastline.

The beachfront were however covered in order to confirm Ross' interpretation. No archaeological artefacts or sites as defined and protected by the National Heritage Resources Act, Act No 25 of 1999 (NHRA 1999) were identified. Dunes, with eroding crests, proved continuously anthropically sterile. No additional artefact clusters were found on the beach. No cultural layer was identified in the large exposed dune section, forming part of the actual Hotel & Conference Centre Development area and situated immediately adjacent to the beachfront; thus confirming that dunes in the area most probably comprise only of anthropically sterile dune sands and are not covered shell middens mistaken for dunes.



Figure 2: View of the dune, behind which lies the staircase to the Hotel & Conference Centre Development area



Figure 4: General view of the beachfront with Cove Rock in the background



Figure 3: General view of the beachfront with the Hlozi River mouth



Figure 5: A tusk discovered at an inferred LSA site, Kayser's Beach

Findings of the assessment were not included in the Hotel & Conference Centre Development's Phase 1 AIA, based on the fact that the beachfront is not formally included as part of the development area and that no identified heritage resource was to be affected by the development.

The known Xhosa related Cove Rock Historical Period / Living Heritage Site is located in close proximity to the developments and was reported on in both Phase 1 AIA's. Cove Rock will not be directly impacted on by the proposed developments, but consideration of a formal *Local* (Grade 3A / 3B) or *Provincial* (Grade 2) **Heritage Status** was advised. Advantages of a formal heritage status were described in the Phase 1 AIA reports as:

1. Increasing development along the coastline may have indirect negative impact on the conservation of the site; and
2. Formal protection of / development of the Cove Rock site may increase cultural heritage awareness, tourism and education in accordance with new school curriculums.

Large scale existing and proposed residential, light weight industrial and a shopping mall development, to name a few, in the Cove Rock area are all expected to result in increased resident and tourist traffic on the beachfront and by implication expected to indirectly or directly on Cove Rock. In return the site, if well managed, has the potential of becoming an important tourist attraction in the area.

At present it seems that a submission for Cove Rock's heritage status has been submitted to the ECPHRA (Eastern Cape Provincial Heritage Resources Agency), the particulars of which are at present however not clear. The East London Museum may well start with documentation of known living heritage sites in the near future (Pers comm.: Mlonjeni)

o RECOMMENDATIONS

1. It is recommended that the findings reported on in this LoR serves as evidence that the proposed Cove Rock Golf Estate and the adjoining Hotel & Conference Centre Development proceeds as applied for without an additional Phase 1 AIA covering the beachfront being submitted for purposes of heritage compliance in accordance with the NHRA 1999.
2. It is recommended that a formal *Local* (Grade 3A / 3B) or *Provincial* (Grade 2) *Heritage Status* (or a minimum of a management plan as interim arrangement) be considered for Cove Rock due to general large scale development in the Cove Rock area that will result in increasing numbers of residents and tourists alike on the beachfront.

I trust that you will consider the above recommendations in the affirmative.

Yours sincerely,

Karen van Ryneveld

PREPARED BY: KAREN VAN RYNEVELD
ArchaeoMaps Archaeological Consultancy
Tel: 051 446 0148 / 084 871 1064; Fax: N/A; Postal address: P.O. Box 28530, Danhof, 9310;
E-mail: ArchaeoMaps.karen@iburst.co.za

ON BEHALF OF: NISHAL SEWRUTTAN
Biotechnology & Environmental Specialist Consultancy (BESC)
Tel: 043 726 4242; Fax: 043 726 3199; Postal address: P.O. Box 8241, Nahoon, 5210;
E-mail: nishal@besc.co.za