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28 April 1999

**Re: Cultural Resource Management of Mosselbaai Natuurreseervaat**  
Doug Jeffery Environmental Consulting and Facilitation Services  
PO Box 44  
Klapmuts  
7625

Dear Doug,

I hereby confirm that Nelis Visagie and I visited Mosselbaai Natuurreseervaat on 30 and 31 January 1999 to relocate the ten plots. Optional locations of plots were demarcated to the north and south of Mike Taylor's Midden. However, I feel the area to the south of MTM is more appropriate and less likely to contain archaeological material below the surface. The new locations fall within areas of low archaeological sensitivity. Locations for septic tanks were not finalised, but these can be placed in the low density archaeological zones adjacent to the new plot positions (see figures in my Phase I report). I believe that Nelis provided you with ortho-photos indicating the new positions of the ten plots. I am satisfied that you apply for a permit to excavate in the low density archaeological zone provided that I see the plans depicting the location of houses, roads and all services as well as areas where work will be done during development. All excavations must be monitored by a professional archaeologist (see below).

My recommendations regarding cultural resource management and mitigation are given in the accompanying proposal dated 29 April 1999. I stress that a professional archaeologist must be on site to monitor *all* excavation and/or movement of earth. The developer must understand that there is a possibility that important archaeological finds may be made during excavation of foundations, service and other trenches. Such finds could include burials or patches containing good bone or stone artefactual material. The purpose of monitoring earthworks is to ensure that the archaeologist can do something about important archaeological material before it is completely destroyed. If something should be found, the archaeologist must be allowed reasonable time to undertake mitigation. Provision must be allowed in budgeting for such eventualities. Manual excavation of trenches would be preferred to a mechanical digger. Costs of monitoring can only be determined once I have been informed of the duration of excavations.

Please contact me for any additional information.

Yours sincerely and best wishes

Peter Nilssen

**PROPOSAL FOR CULTURAL RESOURCE MANAGEMENT OF  
MOSELBAAI NATUURRESERVAAT, A PORTION OF  
VERLORENVLEI FARM (number 8), ELANDSBAAI,  
PIKETBERG DISTRICT**

Prepared for

**Doug Jeffery**

**Environmental Consulting and Facilitation Services**



(29 April 1999)

Prepared by Peter Nilssen

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## **INTRODUCTION**

In a previous proposal to Doug Jeffery (hereafter referred to as the client) dated 9 January 1999, I made several proposals regarding CRM of Mosselbaai Natuurresewaat. Here I include recommendations for CRM and additional archaeological investigation according to my latest correspondence with the client.

As discussed in my report on the phase 1 archaeological investigation of Mosselbaai Natuurresewaat (dated 27 December 1998), the area(s) of the property currently earmarked for development will be negatively impacted during the building of houses, installation of septic tanks, water tanks, pipes, etc. I recommended that mitigation be conducted prior any disturbance or movement of earth in the area where MTM is located as well as the medium density archaeological zone which will be impacted by the 4X4 exit track (refer to text and figures in phase 1 report).

In my previous report and proposal I stressed the importance of MTM as an archaeological site and cultural resource and this is strongly supported by archaeologists from UCT, the NMC (now the South African Heritage Resource Agency – SAHRA), ACO and HRC. The opinion of all archaeologists whom I consulted is that MTM is probably the only megamidden which is relatively undisturbed and warrants to be declared a National Monument. The manner in which we conserve and manage MTM as a cultural resource is therefore critical.

## **PROPOSAL FOR CRM AND ADDITIONAL ARCHAEOLOGICAL INVESTIGATIONS**

### **MTM**

Members of the SAHRA informed me that there is no guarantee that they will permit partial destruction of MTM for development, even if a phase 2 archaeological investigation has been carried out. Because of its significance and rarity and because it is relatively undisturbed, the SAHRA is unlikely to give permission for development on top of MTM.

Since the developer is applying for Nature Reserve status for the property the following points are worth considering. While the indigenous flora and fauna of the study area are in good

condition, it should be borne in mind that these resources can be reintroduced if they are disturbed or destroyed. Conversely, the cultural resources are not renewable and can not be replaced once they have been disturbed or destroyed. Since cultural resources are now given equal if not more value in terms of conservation, it seems appropriate to take a holistic approach and apply principles of conservation to all resources. Therefore it is in the interest of conservation to avoid destruction of MTM by relocating the plots so that they do not impact the midden directly. Moreover, the developer may consider liaising with the SAHRA in order to have MTM proclaimed a National Monument. This will substantially support an application for Nature Reserve status and will also be a major draw card for the property. Finally, because Cape Nature Conservation are now also concerned with conserving cultural resources, the developer should be aware that an application for Nature Reserve status may be jeopardised if the developer intends to disturb a significant cultural resource, in this case MTM.

MTM must be protected from motor vehicle movement, both during and after construction of the houses. In this regard I suggest that only one of the established vehicle tracks running over MTM be used and that the current midden surface along this track be covered with an appropriately thick layer of gravel. I propose gravel because this material can easily be removed in the event of future archaeological excavations. The developer should establish well marked walking trail(s) or boardwalks across MTM and the remainder of the property so that pedestrians do not trample across archaeological deposits at random. Information boards should be erected at at least two appropriate locations, possibly at the northern and southern boundaries of MTM. These boards should relate the value and significance of MTM as well as conservation guidelines for archaeological sites (e.g., prohibition of any disturbance or removal of any object or part of the midden, pedestrians to follow designated walking trails, the vehicle track or the beach, etc.). It may also be appropriate to demarcate MTM in a way that blends in with the surroundings. Bear in mind that fencing may have the undesired effect of attracting attention. The style of such "fencing" or demarcation should be discussed with the SAHRA.

Costs of monitoring the excavation of foundations and trenches and any disturbance and movement of earth can only be determined once I have been informed (by the developer) about the duration of such excavations.

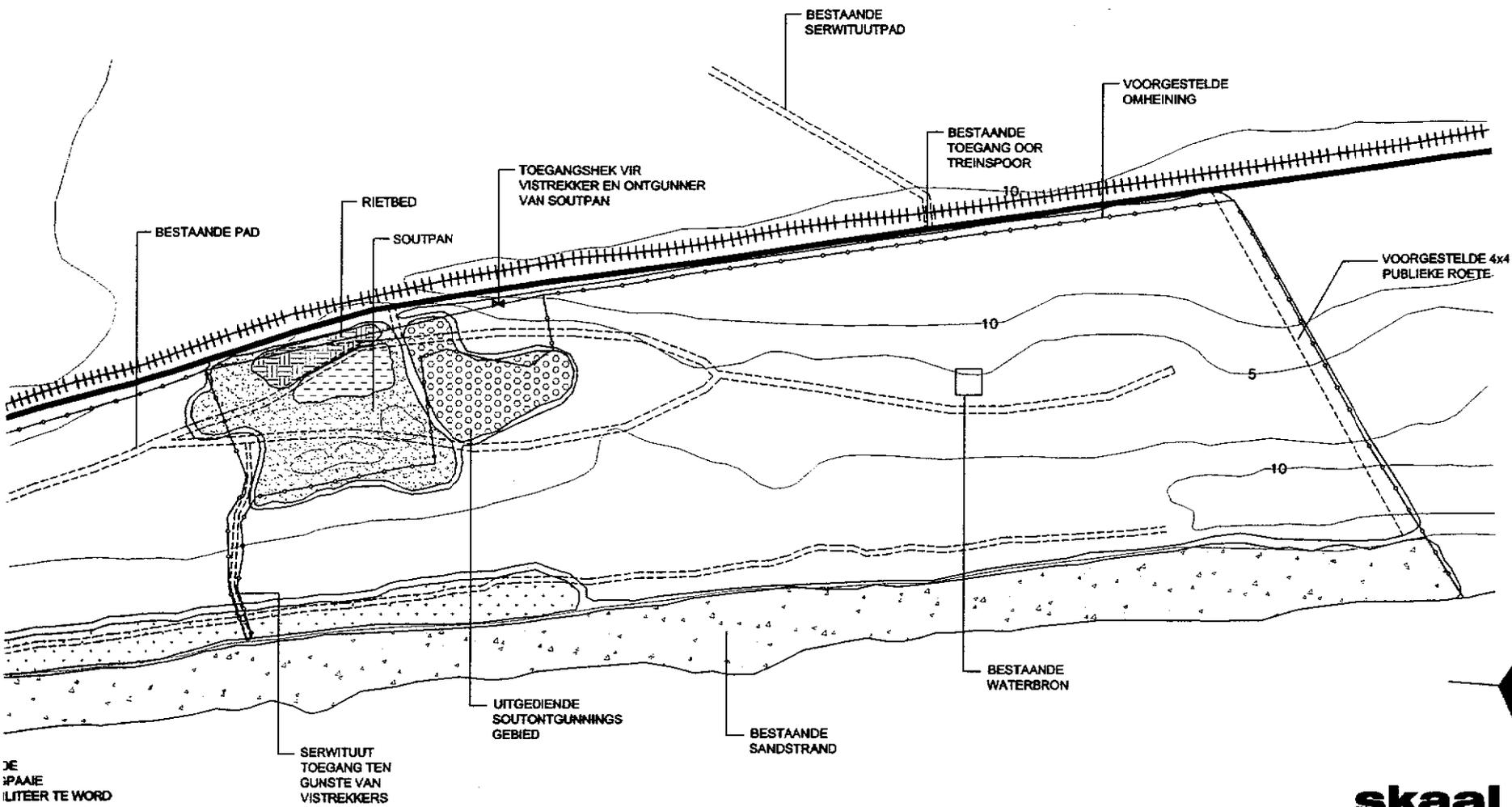
**Proposal for MTM:**

Relocate the plots to the south and/or north of MTM and consider applying to and supporting the SAHRA to declare MTM a National Monument. This option is most appealing from both perspectives (1) from the developer's point of view: it is the cheapest in terms of archaeological mitigation; it will prevent a great deal of bureaucracy; it will save time regarding mitigation and application for a permit from the SAHRA to destroy part of MTM; it will substantially endorse an application for Nature Reserve status; it will enhance the developer's standing with respect to Integrated Environmental Management (2) from CRM's point of view: it will conserve a rare and significant cultural resource; it will preserve an important part of South Africa's cultural heritage for future research, education and tourism.

If the plots are moved south and/or north to the low density archaeological area between MTM and the medium density archaeological area to the south (see Figure 2 in phase 1 report), the archaeologist must monitor the excavation of foundations, septic tanks, trenches for water and sewerage, and any other disturbance or movement of earth in the event of uncovering significant archaeological remains. Monitoring must take place during movement and disturbance of earth and not thereafter. The developer must understand that there is a possibility that important archaeological finds may be made during excavation of foundations, service and other trenches. Such finds could include burials or patches containing good bone or stone artefactual material. The purpose of monitoring earthworks is to ensure that the archaeologist can do something about important archaeological material before it is completely destroyed. If something should be found, the archaeologist must be allowed reasonable time to undertake mitigation. Provision must be allowed in budgeting for such eventualities. Manual excavation of trenches would be preferred to a mechanical digger. The archaeologist must be present when the new positions of plots are pegged out to ensure that they do not encroach on the medium density archaeological zone. If the latter is unavoidable, the medium density archaeological zone will need to be sampled.

**Proposal for medium density archaeological zone:**

The proposed 4X4 exit track at the southern extent of the property will have a negative impact on a portion of the medium density archaeological zone. Considering the area which will be negatively impacted, I recommend excavating 8 square meters in this area.



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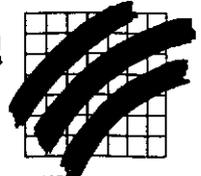
# ELBAAI NATUURRESERVAAT

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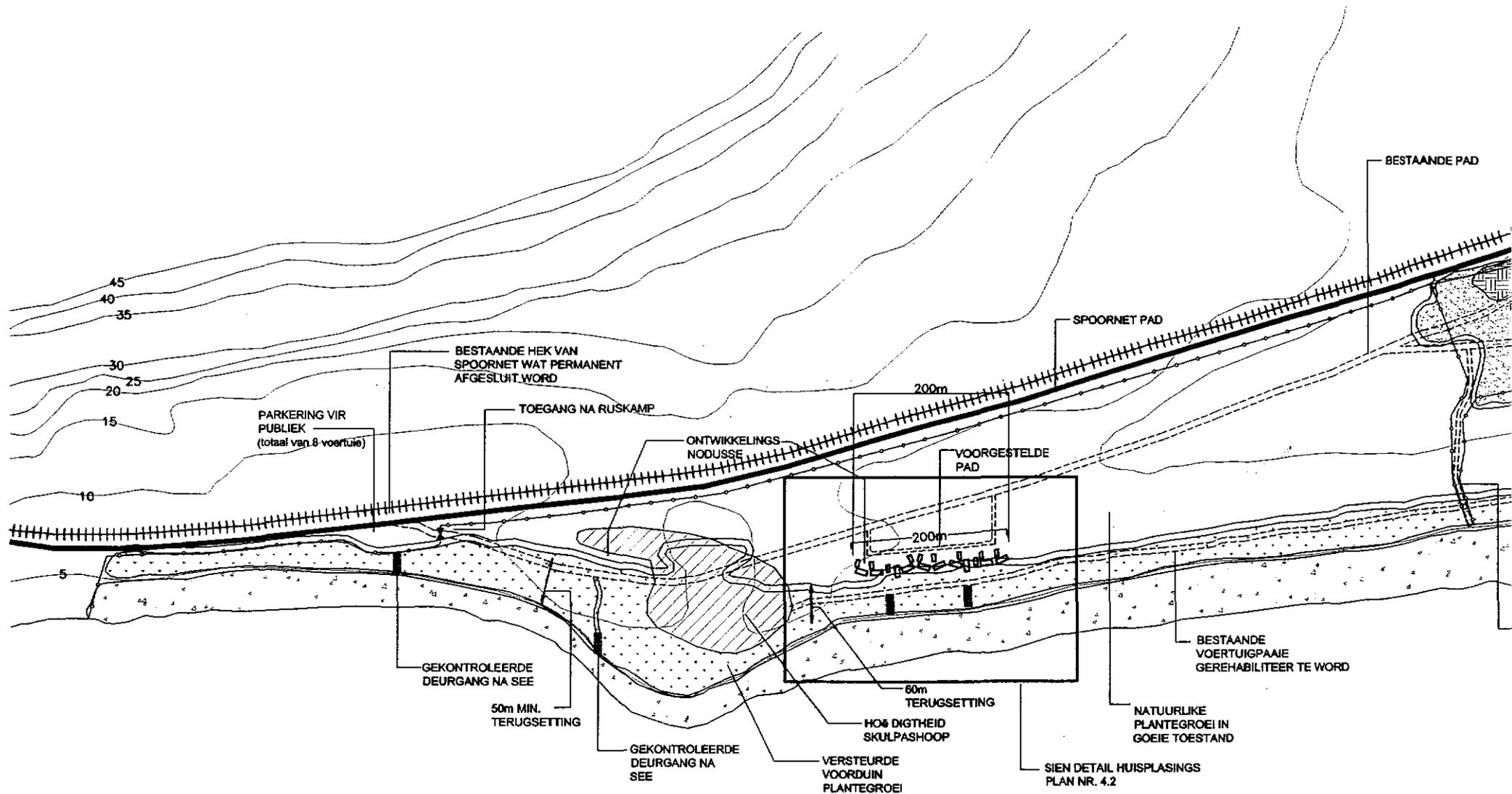
**4.1**

**Steyn Larsen**  
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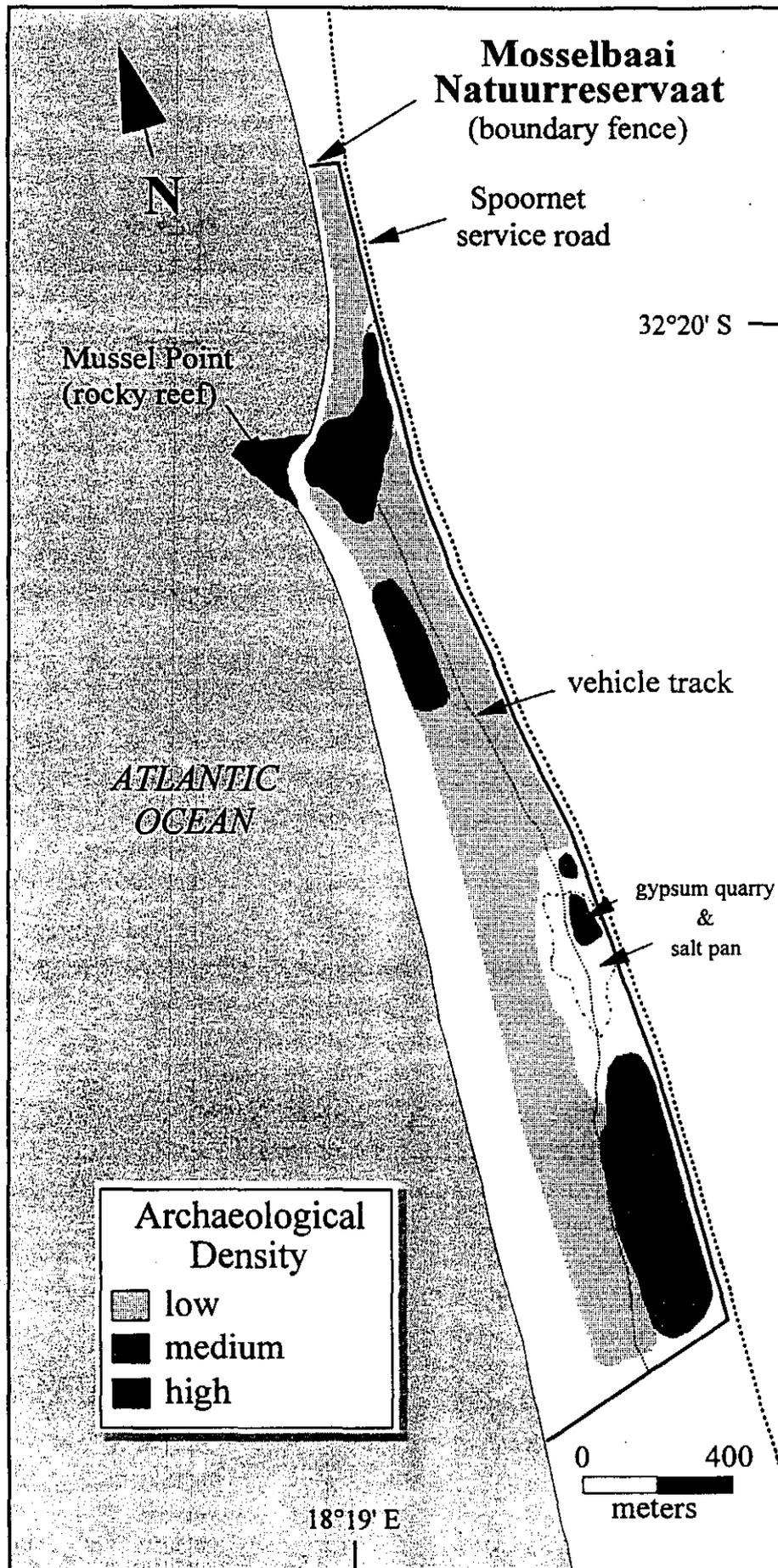


Figure 2. Map showing the densities of archaeological material in different parts of the Mosselbaai Natuurreservaat as described in the text. The unshaded, western part of the property and south of the reef is densely vegetated making visibility low.