

PHASE ONE HERITAGE IMPACT ASSESSMENT OF THE PROPOSED UPGRADE AND CONSTRUCTION OF TOURIST FACILITIES WITHIN THE KING SABATA DALINDYEBO LOCAL MUNICIPALITY, COFFEE BAY & HOLE IN THE WALL, EASTERN CAPE PROVINCE.



ACTIVE HERITAGE

For: ACER (Africa) Environmental Consultants

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Frans was employed as a junior research associate at the then University of Transkei, Botany Department in 1988-1990. Although attached to a Botany Department he conducted a palaeoecological study on the Iron Age of northern Transkei - this study formed the basis for his MA thesis in Archaeology. Frans left the University of Transkei to accept a junior lecturing position at the University of Stellenbosch in 1990. He taught mostly undergraduate courses on World Archaeology and research methodology during this period.

From 1991 – 2001 Frans was appointed as the head of the department of Historical Anthropology at the Natal Museum, Pietermaritzburg. His tasks included academic research and publication, display conceptualization, and curating the African ethnology collections of the Museum. He developed various displays at the Natal Museum on topics ranging from Zulu material culture, traditional healing, and indigenous classificatory systems. During this period Frans also developed a close association with the Departments of Fine Art, Psychology, and Cultural and Media Studies at the then University of Natal. He assisted many post-graduate students with projects relating

to the cultural heritage of South Africa. He also taught post-graduate courses on qualitative research methodology to honours students at the Psychology Department, University of Natal. During this period he served on the editorial boards of the *South African Journal of Field Archaeology* and *Natalia*.

Frans left the Natal Museum in 2001 when approached by a Swiss funding agency to assist an international NGO (Working Group for Indigenous Minorities) with the conceptualization of a San or Bushman museum near Cape Town. During this period he consulted extensively with various San groupings in South Africa, Namibia and Botswana. During this period he also made major research and conceptual contributions to the Kamberg and Didima Rock Art Centres in the Ukhahlamba Drakensberg World Heritage Site.

Between 2003 and 2007 Frans was employed as the Cultural Resource Specialist for the Maloti Drakensberg Transfrontier Project – a bilateral conservation project funded through the World Bank. This project involved the facilitation with various stakeholders in order to produce a cultural heritage conservation and development strategy for the adjacent parts of Lesotho and South Africa. Frans was the facilitator for numerous heritage surveys and assessments during this project. This vast area included more than 2000 heritage sites. Many of these sites had to be assessed and heritage management plans designed for them. He had a major input in the drafting of the new Cultural Resource Management Plan for the Ukhahlamba Drakensberg World Heritage site in 2007/2008. A highpoint of his career was the inclusion of Drakensberg San indigenous knowledge systems, with San collaboration, into the management plans of various rock art sites in this world heritage site. He also liaised with the tourism specialist with the drafting of a tourism business plan for the area.

During April 2008 Frans accepted employment at the environmental agency called Strategic Environmental Focus (SEF). His main task was to set-up and run the cultural heritage unit of this national company. During this period he also became an accredited heritage impact assessor and he is rated by both Amafa and the South African Heritage Resources Agency (SAHRA). He completed almost 50 heritage impact assessment reports nation-wide during an 18th month period.

Frans left SEF and started his own heritage consultancy called “Active Heritage cc” in July 2009. Although mostly active along the eastern seaboard his clients also include international companies such as Royal Dutch Shell through Golder Associates, and UNESCO. He has now completed almost 1000 heritage conservation and management reports for various clients since the inception of “Active Heritage cc”. Amongst these was a heritage study of the controversial fracking gas exploration of the Karoo Basin and various proposed mining developments in South Africa and proposed developments adjacent to various World Heritage sites. Apart from heritage impact assessments (HIA's) Frans also assist the National Heritage Council (NHC) through Haley Sharpe Southern Africa', with heritage site data capturing and analysis for the proposed National Liberation Route World Heritage Site and the national intangible heritage audit. In

addition, he is has done background research and conceptualization of the proposed Dinosaur Interpretative Centre at Golden Gate National Park and the proposed Khoi and San Interpretive Centre at Camdeboo, Eastern Cape Province. During 2009 he also produced the first draft dossier for the nomination of the Sehlabathebe National Park, Lesotho as a UNESCO inscribed World Heritage Site.

Frans was appointed as temporary lecturer in the department of Heritage and Tourism, UKZN in 2011. He is also a research affiliate at the School of Cultural and Media Studies in the same institution.

Frans's research interests include African Iron Age, paleoecology, rock art research, San ethnography, traditional healers in South Africa, and heritage conservation. Frans has produced more than forty publications on these topics in both popular and academic publications. He is frequently approached by local and international video and film productions in order to assist with research and conceptualization for programmes on African heritage and culture. He has also acted as presenter and specialist for local and international film productions on the rock art of southern Africa. Frans has a wide experience in the fields of museum and interpretive centre display and made a significant contribution to the conceptual planning of displays at the Natal Museum, Golden Horse Casino, Didima Rock Art Centre and !Khwatla San Heritage Centre. Frans is also the co-founder and active member of "African Antiqua" a small tour company who conducts archaeological and cultural tours world-wide. He is a Thetha accredited cultural tour guide and he has conducted more than 50 tours to heritage sites since 1992.

Declaration of Consultants independence

Frans Prins is an independent consultant to Acer Africa and has no business, financial, personal or other interest in the activity, application or appeal in respect of which he was appointed other than fair remuneration for work performed in connection with the activity, application or appeal. There are no circumstances whatsoever that compromise the objectivity of this specialist performing such work.



Frans Prins

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LIST OF ABBREVIATIONS AND ACRONYMS

EIA	Early Iron Age
ESA	Early Stone Age
HISTORIC PERIOD	Since the arrival of the white settlers - c. AD 1820 in this part of the country
IRON AGE	Early Iron Age AD 200 - AD 1000 Late Iron Age AD 1000 - AD 1830
LIA	Late Iron Age
LSA	Late Stone Age
MSA	Middle Stone Age
NEMA	National Environmental Management Act, 1998 (Act No. 107 of 1998 and associated regulations (2006)).
NHRA	National Heritage Resources Act, 1999 (Act No. 25 of 1999) and associated regulations (2000))
SAHRA	South African Heritage Resources Agency
STONE AGE	Early Stone Age 2 000 000 - 250 000 BP Middle Stone Age 250 000 - 25 000 BP Late Stone Age 30 000 - until c. AD 200

EXECUTIVE SUMMARY

A heritage survey of the proposed upgrade and construction of tourist facilities within the King Sabata Dalindyebo local Municipality, Coffee Bay & Hole in the Wall, Eastern Cape identified no archaeological or historical sites on the two proposed development nodes. No graves older than 60 years old and/or belonging to victims of conflict occur on the footprint. However, the Hole in the Wall geological feature is also a 'living heritage site' associated with local amaBomvana notions of the waterpeople or *abantubomlambo* – a category of ancestral beings. A buffer zone of 50m must be maintained around this feature. None of the proposed development actions, however, will take place closer than 150m to this landmark site. Nevertheless, the local community has voiced concern regarding the proposed development having an impact on the 'sense of place' associated with this feature. It is recommended that the meeting be scheduled with the local community to address their concerns prior to any development. The footprint falls within an area with a high fossil sensitivity. However, due to the minimum impact of the proposed development on the geological deposits it is recommended that no further paleontological studies be conducted. However, a protocol of finds should be implemented. Attention is drawn to the South African Heritage Resources Act, 1999 (Act no. 25 of 1999), which requires that operations that expose archaeological or historical remains as well as graves and fossil material should cease immediately, pending evaluation by the provincial heritage agency.

1 BACKGROUND INFORMATION ON THE PROJECT

Table 1. Background information

Consultant:	Frans Prins (Active Heritage) for ACER (Africa) Environmental Consultants
Type of development:	Tourism Development Nodes development at a) Coffee Bay and b) Hole in Wall, Eastern Cape Province.
Rezoning or subdivision:	Rezoning
Terms of reference	To carry out a Phase One Heritage Impact Assessment
Legislative requirements:	The Heritage Impact Assessment was carried out in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and following the requirements of the National Heritage Resources Act, 1999 (Act No. 25 of 1999).

1.1. Terms of reference:

To assess potential environmental impacts of project activities associated with the proposed upgrade and construction of the tourist facilities within Coffee Bay and to meet the requirements of the Environmental Impact Assessment (EIA) Regulations of 2014 (as amended), a Basic Assessment (BA) must be undertaken to obtain an Environmental Authorisation (EA) for this proposed project. The appointed specialist must provide an assessment of the potential impacts that the upgrade and construction of the tourist facilities within Coffee Bay and Hole in the Wall will have on terrestrial heritage (including palaeontological features) and vice versa.

The specialist study should address the following question:

What are the potential impacts on terrestrial heritage resources (including palaeontological features) arising from the proposed upgrades and construction of tourist facilities within Coffee Bay and Hole in the Wall?

Specifically, the Heritage Assessment must address the following primary elements:

- a) The identification and assessment of potential impacts on cultural heritage resources, including historical sites arising from the proposed upgrades and construction of tourist facilities within Coffee Bay?
- b) The early identification of any red flag and fatal flaw issues or impacts.
- c) Information must be provided on the following:
 - (i) Results of an overview survey of the project area, and the identification of cultural heritage resources that may be affected by the proposed project or which may affect the proposed project during construction and operation.
 - (ii) Recommended mitigation measures for enhancing positive impacts and avoiding or

minimizing negative impacts and risks (to be implemented during design, construction and operation).

d) Address specific issues and concerns raised by stakeholders during the public review phase of the EIA process (an Issues and Responses Report will be provided to specialists).

e) Formulation of a protocol to be followed by the Applicant for the identification, protection or recovery of cultural heritage resources during construction and operation, including the completion of all necessary permit applications, which may be required.

f) The identification and assessment of any paleontological aspects or findings arising from the proposed upgrades and construction of tourist facilities within Coffee Bay.

g) Identify permit requirements as related to the removal and/or destruction of heritage resources (maritime and terrestrial).

h) The heritage specialist is also required to obtain comment from SAHRA/ECPHRA on the BA reports, upload required documentation onto the Agency's online system, and arrange for payment of fees.

1.2. Details of the area surveyed:

ACER (Africa) Environmental Consultants have commenced with an environmental impact assessment process (through a basic assessment application) to review and obtain authorisation from the National Department of Environment, Forestry and Fisheries (DEFF) for the upgrade and expansion of tourist facilities on a portion of coastline in the Eastern Cape (Figs 1 & 5). The upgrade and construction of facilities is proposed for Coffee Bay Main Beach (Figs 2 & 6) and Hole in the Wall (Figs 3 & 7), destinations located within the King Sabata Dalindyebo Local Municipal area. At Coffee Bay Main Beach, the proposed site for construction is positioned at 31°59'0.57"S / 29° 9'1.57"E and is located on the northern bank of the Nenga river mouth. Hole in the Wall lies at 32° 2'0.16"S / 29° 6'39.89"E and is located on the northern bank of the Mpako River.

2 BACKGROUND TO ARCHAEOLOGICAL HISTORY OF AREA

The archaeological history of the Province of the Eastern Cape Province dates back to about 2 million years and possibly older, which marks the beginning of the Stone Age. The Stone Age in the Eastern Cape Province was extensively researched by archaeologists attached to the Albany Museum in Grahamstown, the University of Stellenbosch, the then University of Transkei (UNITRA) and Fort Hare University. The Stone Age period has been divided in to three periods namely: Early Stone Age (ESA) dating between 2 million years ago to about 200 000 years ago, Middle Stone Age (MSA)

dating between 200 000 years ago to about 30 000 years ago, and the Later Stone Age (LSA) which dates from 30 000 to about 2 000 year ago. The Stone Age period ends around approximately 2 000 years ago when Bantu speaking Age farmers from the north arrived in southern Africa. The Iron Age is also divided into three periods, namely: Early Iron Age (EIA) dating between AD 200 and AD 900, Middle Iron Age (MIA) dating between AD 900 and AD 1300, Late Iron Age (LIA) dating between AD 1 300 and 1 820.

2.1 Stone Age

2.1.1 Early Stone Age (ESA)

The ESA is considered as the beginning of the stone tool technology. It dates back to over 2 million years ago until 200 000 years ago. This period is characterised by the Oldowan and Acheulean industries. The Oldowan Industry, dating to approximately between over 2 million years and 1.7 million years predates the later Acheulean. The Oldowan Industry consists of very simple, crudely made core tools from which flakes are struck a couple of times. To date, there is no consensus amongst archaeologists as to which hominid species manufactured these artefacts. The Acheulean Industry lasted from about 1.7 million years until 200 thousand years ago. Acheulean tools were more specialized tools than those of the earlier industry. They were shaped intentionally to carry out specific tasks such as hacking and bashing to remove limbs from animals and marrow from bone. These duties were performed using the large sharp pointed artefacts known as hand axes. Cleavers, with their sharp, flat cutting edges were used to carry out more heavy duty butchering activities (Esterhuysen, 2007). The ESA technology lasted for a very long time, from early to middle Pleistocene and thus seems to have been sufficient to meet the needs of early hominids and their ancestors. Although not identified on the footprint, ESA tools occurrence have been reported in other sites in the Eastern Cape province (Derricourt 1977: Feely 1987). Closer to the project Van Schalkwyk (2011) commented on the presence of low density ESA sites across the length of the Neptune-Poseidon Eskom power line route, while further low density ESA were reported on from the Needs Camp / Potsdam area (Van Ryneveld 2014b). Sangoan period sites have been recorded in the greater Port Edward area and adjacent parts of the Eastern Cape Province. Sangoan period sites are seen to be a late expression of the Early Stone Age and may date back to about 300 000 years ago (Mitchell 2002). It is possible that more systematic surveys will also locate Sangoan period sites further south in the eastern Cape. Apart from stone artefacts, the ESA sites in the Eastern Cape have produced very little as regards other archaeological remains.

This has made it difficult to make inferences pointing to economical dynamics of the ESA people in this part of the world (Mazel 1989, Mitchell 2002).

2.1.2 Middle Stone Age (MSA)

The MSA dates to between 200 000 and 30 000 years ago, coinciding with the emergence of anatomically modern humans. The MSA technology is therefore believed to have been manufactured by fully modern humans known as *Homo sapiens* who emerged around 250 000 years ago. While some of the sites belonging to this time period occur in similar contexts as those of ESA, most of the MSA sites are located in rock shelters. Palaeoenvironmental data suggest that the distribution of MSA sites in the high lying Drakensberg and surrounding areas was influenced by the climate conditions, specifically the amount and duration of snow (Carter, 1976). In general, the MSA stone tools are smaller than those of the ESA. Although some MSA tools are made from prepared cores, the majority of MSA flakes are rather irregular and are probably waste material from knapping exercises. A variety of MSA tools include blades, flakes, scrapers and pointed tools that may have been hafted onto shafts or handles and used as spearheads. Between 70 000 and 60 000 years ago new tool types appear known as segments and trapezoids. These tool types are referred to as backed tools from the method of preparation. Residue analyses on the backed tools from South African MSA sites including those in KZN indicate that these tools were certainly used as spear heads and perhaps even arrow points (Wadley, 2007). Derricourt (1977) reported a few MSA sites in the Eastern Cape but none of those reported by him occur in the immediate vicinity of the project area. Van Schalkwyk (2011) commented on the presence of low density MSA) occurrences across the length of the Neptune-Poseidon Eskom power line route, while further low density MSA lithic artefacts were reported on from the Needs Camp / Potsdam area (Van Ryneveld 2014b).

2.1.3 Late Stone Age (LSA)

Compared to the earlier MSA and ESA, more is known about the LSA which dates from around 30 000 to 2 000 (possibly later) years ago. This is because LSA sites are more recent than ESA and MSA sites and therefore achieve better preservation of a greater variety of organic archaeological material. The Later Stone Age is usually associated with the San (Bushmen) or their direct ancestors. The tools during this period were even smaller and more diverse than those of the preceding Middle Stone Age period. LSA tool technology is observed to display rapid stylistic change compared to the slower pace

in the MSA. The rapidity is more evident during the last 10 000 years. The LSA tool sequence includes informal small blade tradition from about 22 000 – 12 000 years ago, a scraper and adze-rich industry between 12 000 – 8 000 years ago, a backed tool and small scraper industry between 8 000 – 4 000 years and ending with a variable set of other industries thereafter (Wadley, 2007). Adzes are thought to be wood working tools and may have also been used to make digging sticks and handles for tools. Scrapers are tools that are thought to have been used to prepare hides for clothing and manufacture of other leather items. Backed tools may have been used for cutting as well as tips for arrows. It was also during Later Stone Age times that the bow and arrow was introduced into southern Africa – perhaps around 20 000 years ago. Because of the extensive use of the bow and arrow and the use of traps and snares, Later Stone Age people were far more efficient in exploiting their natural environment than Middle Stone Age people. Up until 2 000 years ago Later Stone Age people dominated the southern African landscape. However, shortly after 2 000 years ago the first Khoi herders and Bantu-speaking agro pastoralists immigrated into southern Africa from the north. The Sundays River has acted as an ecological frontier between Khoi herders and Iron Age farmers for more than a millennia. Historical accounts indicate that these interactions were particularly complex. Nevertheless it appears that Khoi groups were systematically been assimilated into expanding Xhosa chiefdoms (Laband 2019) including the environs of the project area. This led to major demographic changes in the population distribution of the subcontinent. The San who kept more to the inland mountainous areas were either assimilated or moved off to more marginal environments such as the Kalahari Desert or some mountain ranges unsuitable for small-scale subsistence farming and herding. The San in the coastal areas of the study area were the first to have been displaced by incoming African agro pastoralists. Oral traditions among the amaMphondo people in northern Transkei refer to the presence of coastal San as late as the early 1800's. Some independent San groups continue to practice their hunter gatherer lifestyle in the foothills of the Drakensberg until the period of white colonisation around the 1840's (Mitchel 2002, Wright & Mazel, 2007). Also dating to the LSA period is the impressive Rock Art found on cave walls and rock faces. Rock Art can be in the form of rock paintings or rock engravings. The Eastern Province is renowned for the prolific San rock painting sites concentrated in the southern Drakensberg and adjacent areas to the south. Rock art sites do occur outside the Drakensberg including the Mphondoland coastal zone and some major river valleys such as the Kei River (Feely 1987). Khoi schematic rock art has also been recorded at Middledrift near Queenstown (Derricourt 1977).

2.2 Iron Age

2.2.1 Early Iron Age (EIA)

Unlike the Stone Age people whose life styles were arguably egalitarian, Iron Age people led quite complex life styles. Their way of life of greater dependence on agriculture necessitated more sedentary settlements. They cultivated crops and kept domestic animals such as cattle, sheep, goats and dogs. Pottery production is also an important feature of Iron Age communities. Iron smelting was practised quite significantly by Iron Age society as they had to produce iron implements for agricultural use. Although Iron Age people occasionally hunted and gathered wild plants and shellfish, the bulk of their diet consisted of the crops they cultivated as well as the meat of the animals they kept. EIA villages were relatively large settlements strategically located in valleys beside rivers to take advantage of the fertile alluvial soils for growing crops (Maggs, 1989. Huffman 2007). The EIA sites in the Eastern Cape Province dates back between AD 600 to AD 900. Based on extensive research on EIA sites in the eastern seaboard they can be divided along the following typological criteria and time lines according to ceramic styles (Maggs, 1989; Huffman 2007):

- _ Msuluzi (AD 500-700);
- _ Ndondondwane (AD 700 – 800);
- _ Ntshekane (AD 800 – 900).

Jim Feely (1987) found several EIA sites between the Kei and Umtavuna Rivers in the 1980's. Unfortunately he never surveyed the environs of the project area. Further south EIA sites have been identified as far south as the greater East London area. Canasta Place, located approximately 20km west of East London is the southern-most recorded LIA site to date, confirming the presence of Early Iron Age communities to the south of the project area as early as 700-1,000AD (Nogwaza 1994).

2.2.2 Late Iron Age (LIA)

The LIA is not only distinguished from the EIA by greater regional diversity of pottery styles but is also marked by extensive stone wall settlements. However, in this part of the world, stone walls were not common as the Nguni people used thatch and wood to build their houses (Derricourt 1977). This explains the failure to obtain sites from the aerial photograph investigation of the study area. LIA sites in the Eastern Cape occur adjacent to the major rivers in low lying river valleys but also along ridge crests above the 800m contour. The LIA to the north of the project area can be ascribed to the

amaXhosa people or their immediate ancestors (Feely 1987). Trade played a major role in the economy of LIA societies. Goods were traded locally and over long distances. The main trade goods included metal, salt, grain, cattle and thatch. This led to the establishment of economically driven centres and the growth of trade wealth. Keeping of domestic animals, metal work and the cultivation of crops continued with a change in the organisation of economic activities (Maggs, 1989; Huffman 2007). Jim Feely found several LIA between the Umtavuna and Kei Rivers during archaeological surveys in the 1980's (Feely 1987). Unfortunately he never surveyed in the environs of the project area. However, local Bomvana oral traditions indicate that the area may have been inhabited by their ancestors from at least the 17th century – if not earlier. It is almost certain that systematic archaeological surveys will encounter LIA sites in the area. Further south LIA sites have been reported on in CRM reports: Towards the south of the Buffalo River the intangible LIA site of Cove Rock remain of importance (Binneman & Webley 1996; Van Ryneveld 2008d, 2008e). A large LIA homestead site, with livestock enclosure structures identifiable on aerial imagery was reported on, located in the Amalinda suburb of East London (Van Ryneveld 2016). A significant LIA / contemporary period cemetery was recorded in the Haven Hills area (Van Ryneveld 2015a) and a LIA / contemporary period place of worship was documented from the Needs Camp / Potsdam area (Van Ryneveld 2014). Of significance is the report by Hirst & Victor (2004), reporting on the grave, and associated family cemetery, of the Xhosa Poet Laureate S.E.K. Mqhayi (1875-1945), situated in close proximity to the East London regional waste disposal site

2.3. Historical period

2.3.1. Tribal history

Historically both Coffee Bay and the Hole in the Wall areas was settled by the amaBomvana, a Xhosa-speaking people. According to their own tradition, the amaBomvana people originated from the amaNgwane, a people from Kwa-Zulu Natal. The amaBomvana are descended from Nomafuli, the first of the amaNgwana tribe and from Bomvu, who gave rise to the amaBomvu tribe. Bomvu's Great Son, Nyonemnyam, carried on the Bomvu dynasty. His son Njilo is the progenitor of the amaBomvana. According to local tradition the amaBomvana people left KwaZulu-Natal in 1650 to settle in Mphondoland, in northern Transkei, after a dispute over cattle. After the death of Njilo's wife, their grandson Dibandlela refused to send, in accordance with

custom, the isizi cattle to his grandfather. This led to an open dispute. Dibandlela fled with his supporters and their cattle to settle in Mphondoland.

The amaBomvana remained in Mphondoland until 1837. After experiencing two centuries of tribal wars, the amaBomvana were driven out of Mphondoland into the area east of the Mbashe river, including the present-day Cwebe Reserve and they put themselves under the wing of the Gcaleka people with permission from the amaXhosa chief, Hintsu.

They are historically related and share a common lineage with the amaMpondomise, amaXesibe, abakwaMkhize, amaBomvu and amaMpondo as they all have related cultural similarities. The passing of four centuries since their division and the influence of neighboring tribal groups have brought about the linguistic and cultural differences, and differences in their rituals and rites of passage that we observe today (Derricourt 1977). Today the amaBomvana people live in the environs of both Coffee Bay and Hole in the Wall. They form an distinct ethnicity but are often confused, in popular literature, with their immediate neighbours the amaXhosa. The amaBomvana, however, is related both culturally and politically to the amaXhosa. Both the amaBomvana and the amaXhosa also speak the isiXhosa language.

2.3.2 *European history*

Coffee Bay: The European origins of the name Coffee Bay is obscure. Local history refers to a ship which was wrecked in 1863, depositing its entire cargo of coffee beans on the beach. Some of the beans have taken root and for several years coffee shrubs tried to grow but eventually died. Three small rivers, the *Nenga* (river of the whale), *Bomvu* (red) and *maphuzi* (place of pumpkins) reach the sea in the area of Coffee bay and the local amaBomvana usually refer to the place as *Tshontini*, the name applied to a dense wood there. Over the years Coffee Bay has informally developed as one of the most popular holiday resorts on the Wild Coast. This informal little village is fronted by a superb beach (Fig).

Hole in the Wall: Hole in the Wall is situated some 7km to the south of Coffee Bay. This natural feature consists of a huge detached cliff rising up from the sea in the form of a precipitous island at the mouth of a the *Mpako* river. The pounding waves have worn a substantial tunnel through the centre of the cliff – hence the name Hole in the Wall. This

natural feature was named by Captain Vidal of the vessel *Barracouta*, sent by the British Admiralty in 1823 to survey the coastline between the Keiskamma River and Lourenço Marques (now Maputo). Vidal took his ship to within 800m of the coast, and described in his log "where two ponderous black rocks above the water's edge, upwards of 80 feet above its surface, exhibiting through the phenomenon of a natural archway", prompting him to name it the Hole-in-the-Wall. The coast on either side of the Hole in the Wall is precipitous and notorious for the number of ships wrecked there. Divers constantly find off fragments on many unfortunate vessels while beads and coins are often discovered in the pools. Among the tribes living along the coast are many descendants of people shipwrecked whose ancestors, of European and Asian descent, mingled with the African population who gave them shelter (Bulpin 1980:382).

2.5 Living heritage

The local amaBomvana people named the Hole in the Wall formation '*EsiKhaleni*', or the 'place of the sound' also called 'place of the water-people.'

Local legend has it that the river running through the Hole-in-the-Wall (*Mpako* River) once formed a landlocked lagoon as its access to the sea was blocked by a cliff. A beautiful girl lived in a village near the lagoon cut off from the sea by the mighty cliff. One day she was seen by one of the mythical 'water people' or *abantubomlambo* who also lives in the water surrounding the feature. They became overwhelmed by her beauty and tried to woo her. When the girl's father found out he forbade her to see her lover. So at high tide one night, the 'water people' came to the cliff and, with the help of a huge fish, rammed a hole through the centre of the cliff. As they swam into the lagoon they shouted and sang, causing the villagers to hide in fear. In the commotion the girl and her lover were reunited and disappeared into the sea. At certain times of the year, it is said, the music and singing of the 'water people' can be heard.

The 'water-people' or *abantubomlambo* is a category of ancestral being that live under the water. They are often described as mermaid-like with supple wrists and ankles and flipperlike hands and feet. Some are also said to have fish or snake tails for feet. They are instrumental in the training of diviners (traditional healers) and play a central part in traditional healing practices to this very day. They form part of a greater complex of indigenous beliefs that occurs over the greatest part of southern Africa – called the Underwater Symbolic Complex (Bernard 2010). Local amaBomvana beliefs holds that

the hole in the rock face of Hole in the Wall is also the gateway to the world of these ancestors. During certain seasons and water conditions the waves clap in such a fashion that the concussion can be heard throughout the valley. The feature is then also called the 'place of thunder' (Fig 25).

Although Hole in the Wall is a geological feature it also has living heritage values. It is one of numerous natural features associated with the 'water people' and associated indigenous belief-systems in southern Africa. Others include the Inxu River Falls and pool, Meirings Poort Falls and pool, Howick Fall and pool. As such it is also protected by National Heritage Legislation and it may not be altered or damaged in any way.

3 BACKGROUND INFORMATION OF THE SURVEY

3.1 Methodology

A desktop study was conducted of the known archaeological databases housed in the Eastern Cape. The SAHRIS website was consulted for previous heritage surveys and heritage site data covering the project area. In addition, the available archaeological and heritage literature covering the greater project area was consulted. Aerial photographs covering the area were scrutinised for potential Iron Age and historical period structures and grave sites. A ground survey, following standard and accepted archaeological procedures, was conducted on 30 December 2020. Particular attention was focused on the occurrence of potential grave sites and shell middens on the footprint. The footprint at both Coffee Bay and Hole in the Wall is situated in the immediate environs of existing sand dunes. These areas may potentially harbour shell middens and associated archaeological material which, are the remains of coastal exploitation of marine resources by prehistoric communities.

3.1.1 *Background to the area surveyed*

The project area is situated in an area that has been used extensively by tourists and fishermen during the last few decades. The road linking the villages of Coffee Bay and Hole in the Wall transgress communal areas with amaBomvana homesteads dotted over the landscape (Fig 12). All the homesteads and other residential dwellings adjacent to the road network are younger than 60 years old and have no heritage value (Fig 15). However, it is important to note that the road linking the villages do not form part of the

heritage assessment reported here. The proposed tourism development nodes at both Coffee Bay and Hole in the Wall was walked by foot and assessed for heritage sites and features. No archaeological and/or historical period sites occur within 50m from these development nodes (Figs 15, 16, 17, 18, 21, 22, 23, 24). The consultant did not find any shell middens among the coastal dunes (Figs 16 & 23). Although not strictly speaking part of the proposed development node the Hole in the Wall geological landmark feature (Fig 25) has 'living heritage' values attached to it (see below).

3.2 Heritage Survey Results

Few Heritage Impact Assessments have been completed within 10km of the area proposed for development. Van Schalkwyk and Wahl completed a study in 2008 near Coffee Bay but did not locate any heritage sites. Van Jaarsveld conducted a desktop survey of the greater Coffee Bay area in 2009. However, no heritage sites have been reported for the proposed development zones. A ground survey by the consultant did not located any heritage or archaeological sites within 50m from the proposed road network nor within the close environs of the proposed development areas. Sand dunes occur at both the Coffee Bay and Hole in the Wall development nodes. These areas were walked by foot and carefully scrutinized for any archaeological sites – especially shell middens. However, no archaeological sites, including shell middens, were located on the dune gordon in the immediate environs of the proposed tourism development node. Shell middens do occur along the coastline of Transkei (Bigalke 1973, Derricourt 1977) but the known ones occur to the north and south of Coffee Bay and Hole in the Wall respectively.

The available data bases and literature do not suggest that any heritage features or sites of the following categories occur on the proposed development areas.

- Archaeological Sites (including shell middens)
- Historical Sites

Graves do occur in association with some homesteads on the road linking Coffee Bay with Hole in the Wall. However, this road does not form part of the heritage assessment reported here. No graves were seen in the two areas proposed for development (i.e. Coffee Bay and Hole in the Wall). The absence of old graves were also confirmed by interviews with local residents (Fig 26).

3.2.1. Living Heritage (Hole in the Wall)

The major landmark feature of the project area i.e. 'The Hole in the Wall' has living heritage values (Fig 25). This geological feature, that dates back to some 260 million years, is associated with the 'Indigenous Underwater Symbolic Complex' of the local amaBomvana people. It is said to be the entrance to the world of the 'water people' or *abantubomlambo* – a category of ancestral being associated with the training of diviners or traditional healers. The *abantubomlambo* features prominently in the religious beliefs of isiXhosa-speaking people and San descendants along the eastern seaboard. They are often described as 'mermaid-like' with long flowing hair and fish or snake tails (Fig 27). These water sprites are mostly associated with prominent bodies of water such as pools at prominent waterfalls and also the sea. They are often intimately associated with other mythical beings of the water such as the large water serpent also known as the *inKanyamba* (Fig 28), water leguans, crocodiles, otters and dolphins. They continue to play an active part in the training of traditional healers or diviners (*amacqigha* or *izangoma*). It is believed that the most powerful traditional healers were trained underwater by these 'water sprites'. However, non-healers are afraid of the *abantubomlambo* as they may entice people to enter the water and never allow them to return to the surface again. The underwater world of the water people is said to be a mirror image of the world above the water. There are also huts and large herds of cattle said to be owned by the *abantubomlambo*.

The association of these indigenous beliefs with the Hole in the Wall formation means that this feature has 'living heritage' values. The hole in the rock face is said to be the entrance portal into the world of the *abantobomlambo*. People are discouraged from entering this feature as the *abantobomlambo* may capture them and in effect cause them to drown. As such it can be classified as a 'living heritage' site. 'Living heritage' is recognized in national heritage legislation as a viable category that is also protected. In this context. The National Heritage Resources Act of 1999 alludes to the management of living heritage that is related to heritage objects and sites. On the other hand the National Heritage Councils Act of 1999 refers to the management of living heritage which is not only limited to the safeguarding of living heritage that is linked to tangible forms of heritage but also covers intangible heritage, such as an active belief-system relating to the *abantubomlambo*.

In terms of heritage management policy a buffer of at least 50m must be maintained around this feature, located at S 32° 02' 28.68" E 29° 06' 33.74", and no developments may take place within this buffer zone. It is important for this feature to retain its sense of place. The site may not be altered or damaged under any circumstances. The local beliefs relating to this feature must be respected. However, it is important to note that in terms of the proposed development zone no developments are planned within 160m from this feature. This site is therefore not threatened by the proposed development and there is no need for mitigation.

3.3 Restrictions encountered during the survey

3.3.1 *Visibility*

Good

3.3.2 *Disturbance*

No disturbance of any potential heritage features was noted.

3.4 Details of equipment used in the survey

GPS: Garmin Etrek

Digital cameras: Canon Powershot A460

All readings were taken using the GPS. Accuracy was to a level of 5 m.

4 DESCRIPTION OF SITES AND MATERIAL OBSERVED

4.1 Locational data

Province: Eastern Cape

Closest Towns: Coffee Bay

Municipality: King Sabata Dalindyebo Local Municipality,

4.1.1 Stakeholder Consultation

The consultant spoke to various local residents encountered on the proposed development areas, of both Coffee Bay and Hole in the Wall, during the ground survey (Fig 26). None of them had knowledge of any heritage sites and graves older than 60 year old or graves belonging to victims of conflict, within the project area.

4.1.2 Desktop Paleontology Assessment

The updated fossil sensitivity map, as provided by the SAHRIS website, shows that the project area, including both the Coffe Bay and Hole in the Wall nodes, is situated in an area with both moderate and high paleontological sensitivity (Figs 9 -11). According to SAHRA policy the implication is that a desktop survey by a qualified palaeontologist will be required. However, the proposed developments at both Coffee Bay and Hole in the Wall can be regarded as a low impact with little disturbance of the relevant deposits, sand dunes, and associated vegetation. It is therefore the opinion of the consultant that any impact on potential fossil material will be minimal. It is recommended that no further paleontological studies will be needed - subject to approval by Eastern Province Heritage Agency (EPHRA).

5 STATEMENT OF SIGNIFICANCE (HERITAGE VALUE)

5.1 Field Rating: Coffee Bay Development Node

There are no heritage sites (including shell middens) associated with the proposed Coffee Bay Development Node. The field rating as developed by SAHRA (Table 2) does not apply. There is no need for any mitigation.

5.2 Field Rating: Hole in the Wall Development Node

The Hole in the Wall living heritage site is rated as Local Grade 111A (Table 2) The site is considered to be of high significance locally and it should be retained as a heritage site (Table 3). Following SAHRA policy no development is allowed within 50m from this natural feature. However, it is important that the cultural landscape in the immediate environs of this feature is also important from a heritage perspective. The local community has voiced concern about the area 'loosing its sense of place' if the proposed

development proceeds (Appendix 1). These perceptions have to be addressed in a responsible and systematic manner.

Table 2. Field rating and recommended grading of sites (SAHRA 2005)

Level	Details	Action
National (Grade I)	The site is considered to be of National Significance	Nominated to be declared by SAHRA
Provincial (Grade II)	This site is considered to be of Provincial significance	Nominated to be declared by Provincial Heritage Authority
Local Grade IIIA	This site is considered to be of HIGH significance locally	The site should be retained as a heritage site
Local Grade IIIB	This site is considered to be of HIGH significance locally	The site should be mitigated, and part retained as a heritage site
Generally Protected A	High to medium significance	Mitigation necessary before destruction
Generally Protected B	Medium significance	The site needs to be recorded before destruction
Generally Protected C	Low significance	No further recording is required before destruction

Table 3. Evaluation and statement of significance of the proposed Coffee Bay Tourism Development Node (excluding paleontology)

Significance criteria in terms of Section 3(3) of the NHRA		
	Significance	Rating
1.	Historic and political significance - The importance of the cultural heritage in the community or pattern of South Africa's history.	None.
2.	Scientific significance – Possession of uncommon, rare or endangered aspects of South Africa's cultural heritage.	None.
3.	Research/scientific significance – Potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage.	None.
4.	Scientific significance – Importance in demonstrating the principal characteristics of a particular class of South Africa's cultural places/objects.	None
5.	Aesthetic significance – Importance in exhibiting particular aesthetic characteristics valued by a community or cultural group.	None.

6.	Scientific significance – Importance in demonstrating a high degree of creative or technical achievement at a particular period.	None.
7.	Social significance – Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.	None
8.	Historic significance – Strong or special association with the life and work of a person, group or organization of importance in the history of South Africa.	None.
9.	The significance of the site relating to the history of slavery in South Africa.	None.

Table 4. Evaluation and statement of significance of Hole in the Wall ‘living heritage site’ (excluding paleontology)

Significance criteria in terms of Section 3(3) of the NHRA		
	Significance	Rating
1.	Historic and political significance - The importance of the cultural heritage in the community or pattern of South Africa's history.	None.
2.	Scientific significance – Possession of uncommon, rare or endangered aspects of South Africa's cultural heritage.	None.
3.	Research/scientific significance – Potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage.	None.
4.	Scientific significance – Importance in demonstrating the principal characteristics of a particular class of South Africa's cultural places/objects.	Yes
5.	Aesthetic significance – Importance in exhibiting particular aesthetic characteristics valued by a community or cultural group.	None.
6.	Scientific significance – Importance in demonstrating a high degree of creative or technical achievement at a particular period.	None.
7.	Social significance – Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.	Yes

8.	Historic significance – Strong or special association with the life and work of a person, group or organization of importance in the history of South Africa.	None.
9.	The significance of the site relating to the history of slavery in South Africa.	None.

6 RECOMMENDATIONS

- No archaeological or historical sites occur on any of the proposed tourism development nodes.
- The Hole in the Wall landmark site has also been identified as a 'living heritage site' with a high heritage rating.
- Local indigenous beliefs relating to the Site and the associated 'Underwater Symbolic Complex' must be respected.
- A buffer zone of 50m must be maintained around this site. The Site (Hole in the Wall) may not be changed or damaged under any circumstances. The buffer zone must be maintained.
- Although all proposed developments will take place further than 150m from this feature there has nevertheless been community concerns that the development may compromise the local 'sense of place'. A meeting with local community representatives should therefore be scheduled to discuss these concerns – perhaps as part of a social impact assessment. In fact, a meeting with the community is imperative in order to establish if the area within view of the Hole in the Wall geological feature should be delineated as a potential cultural landscape.
- Both development nodes have been identified as moderate to high in terms of paleontological sensitivity. According to SAHRA policy a qualified palaeontologist will need to conduct a desktop survey of these areas. However, given the fact that the proposed development will have a minimum impact on the geological deposits it the opinion of the consultant that no additional paleontological studies will be required. A protocol of finds, however, will have to be implemented. This opinion is subject to approval by the Eastern Cape Heritage Authority (EPHRA).

- It is important to take note of the National Heritage Act that requires that any exposing of graves older than 60 years and archaeological and historical residues should cease immediately pending an evaluation by the heritage authorities.

7 MAPS AND FIGURES



Figure 1. 1: 50 000 Topographical map showing the location of the project area (black polygon).



Figure 2. Google Earth Imagery showing the location of the project area including the road linking Coffee Bay with Hole in the Wall.



Figure 3. Google Earth Imagery showing the location of the proposed development at Coffee Bay.



Figure 4. Google Earth Imagery showing the proposed development at Hole in the Wall.



Figure 5. Proposed Development Zone at Coffee Bay and Hole in the Wall (entire project area).



Figure 6. Proposed Development Zone: Coffee Bay

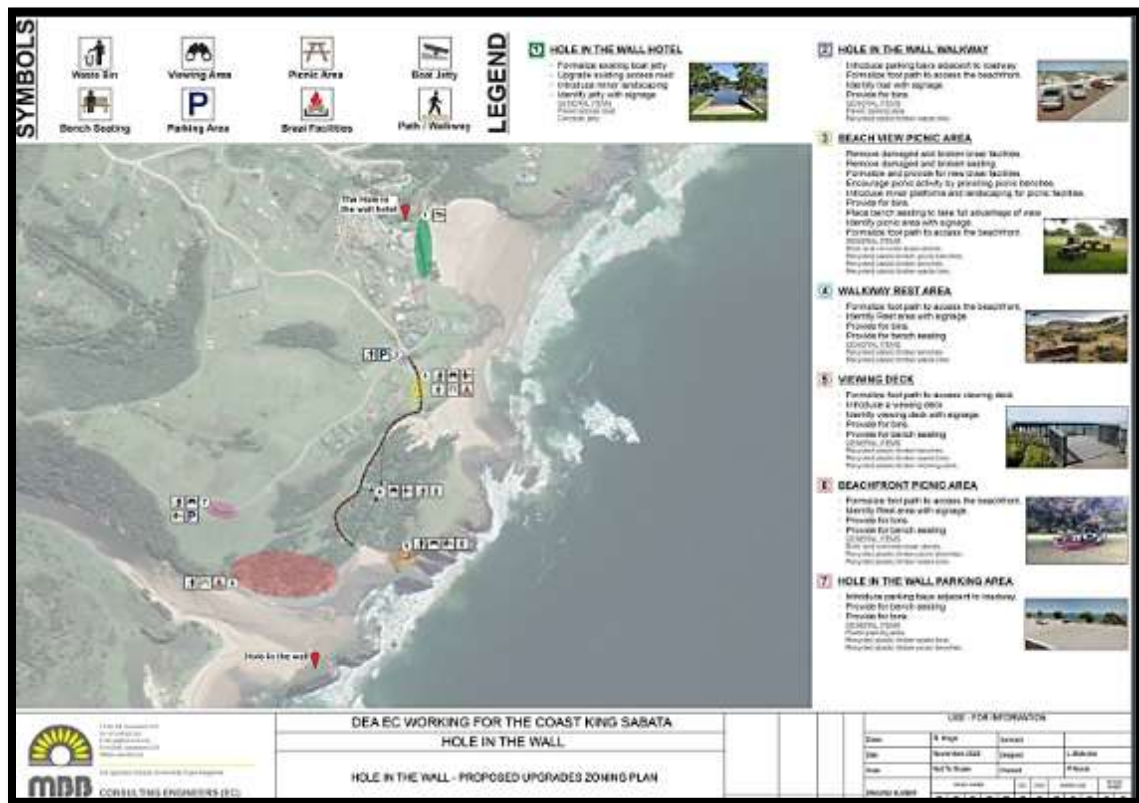
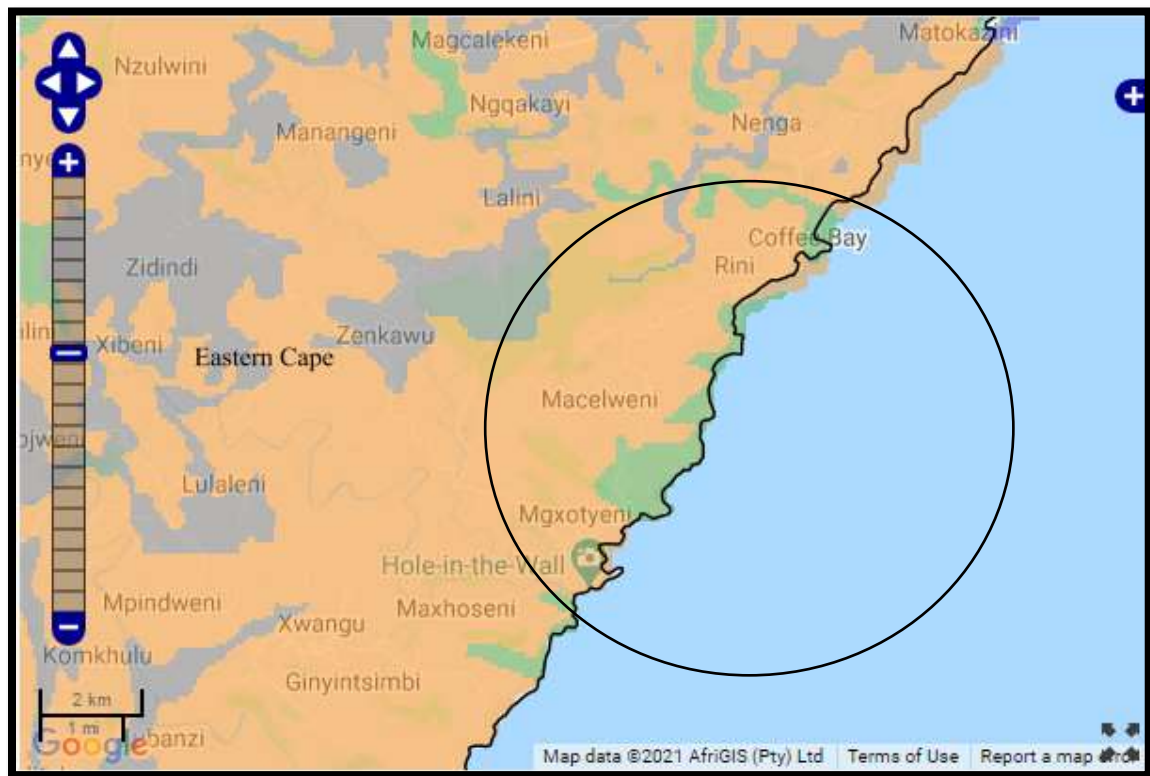


Figure 7. Proposed Development Zone: Hole in the Wall

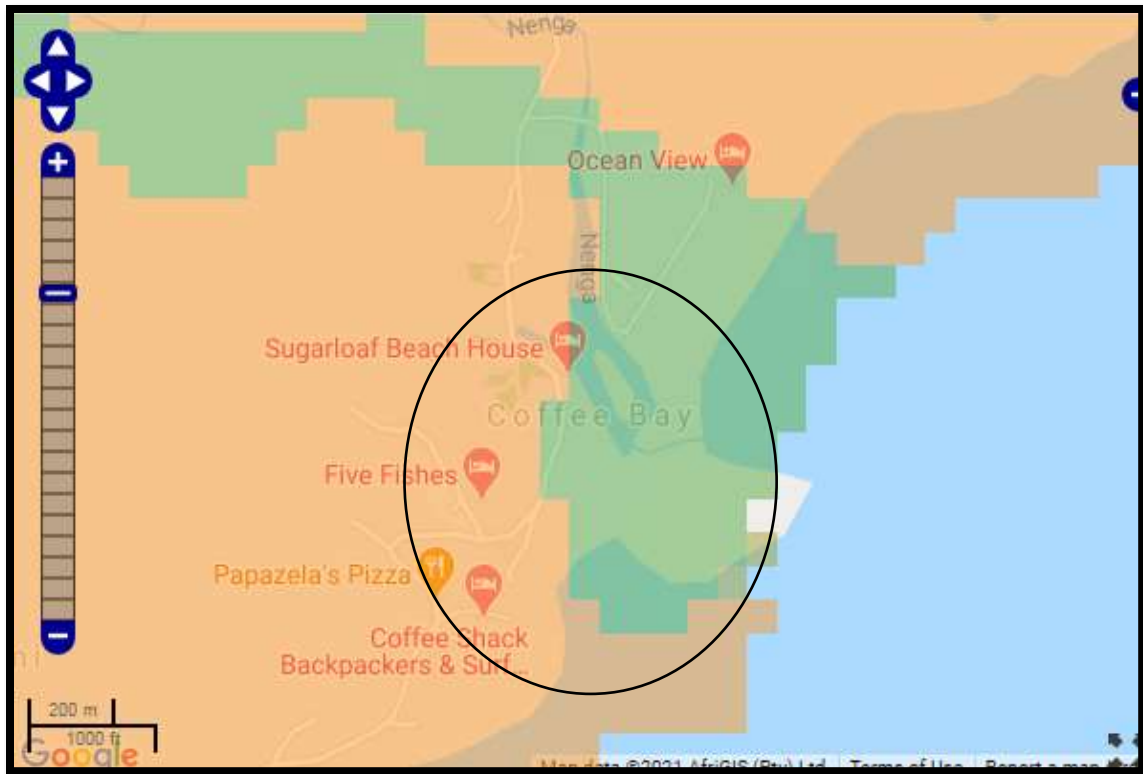


Figure 8. Google Earth Imagery showing the location of Hole in the Wall. This natural feature and landmark also has living heritage values.



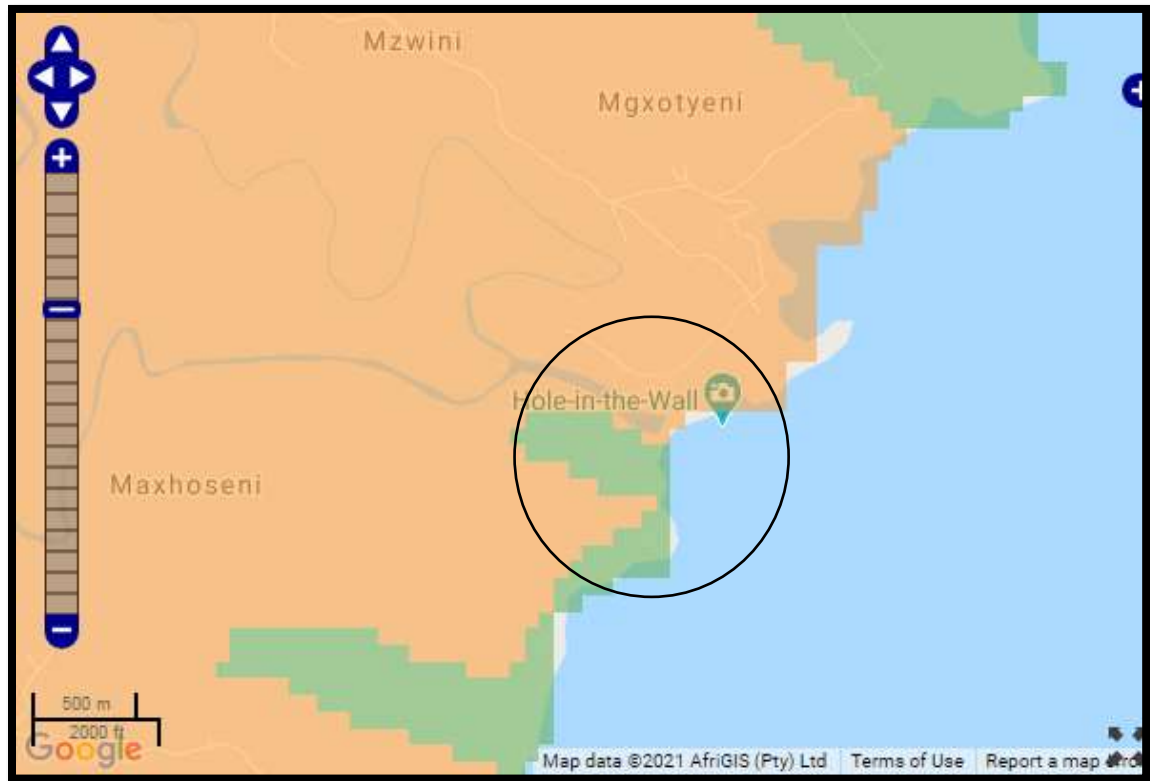
Colour	Sensitivity	Required Action
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

Figure 9. Fossil Sensitivity Map of the entire project area: The proposed development site is indicated by the black polygon. The orange background colour indicates that the proposed development site has a high fossil sensitivity.(Source: SAHRIS website).



Colour	Sensitivity	Required Action
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

Figure 10. SAHRIS fossil sensitivity map of the Coffee Bay Development Zone. The green background colour indicates that the area has a moderate paleontological sensitivity.



Colour	Sensitivity	Required Action
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

Figure 11. SAHRIS fossil sensitivity map of the Hole in the Wall Development Zone. The green background colour indicates that those areas have a moderate paleontological sensitivity. The yellow areas have a high paleontological sensitivity.



Figure 12. Road leading into Coffee Bay. All the buildings on the right are younger than 60 years old with no heritage value.



Figure 13. Holiday units and informal development at Coffee Bay.



Figure 14. Coffee Bay is characterised by informal development, mostly holiday accommodation and associated infrastructure, within a scenic setting. No archaeological sites or heritage features occur in the proposed tourism development node.



Figure 15. Coffee Bay Village. There are no heritage sites or features within 50m from the major roads and within the proposed development node



Figure 16. The beach and dune cordon at Coffee Bay in the immediate vicinity of the proposed development node. The consultant did not locate any shell middens in this area.



Figure 17. Footpaths leading from the proposed development node – no archaeological or heritage sites were observed.



Figure 18. Some fragmented remains of builders rubble occur in the dunes in the proposed tourism development node at Coffee Bay. No archaeological or heirtage sites were observed.



Figure 19. All the Xhosa homesteads, and associated graves, adjacent to the road leading to Hole in the Wall are younger than 60 years old. They have no heritage value.



Figure 20. Road leading into Hole in the Wall Development Zone. No heritage sites or buildings occur within 50m from the road.



Figure 21. Hole in the Wall development zone: no heritage sites features occur adjacent to the road. Hole in the Wall visible in the background.



Figure 22. No archaeological sites or heritage features was observed in the proposed Hole in the Wall development zone including the grassy areas above the dunes.



Figure 21. No shell middens or any other archaeological sites occur on the sand dunes within the Hole in the Wall development zone.



Figure 24. Although small concentrations of shellfish was observed along the dunes near Hole in the Wall none of these occurrences are human-made. These are not shell-middens.



Figure 25. Hole in the Wall. A major landmark in the area. This geological feature also has living heritage values. The hole in the rock formation is believed to be the portal to the underwater world of the legendary water people or abantubomlambo.



Figure 26. Local residents encountered during the survey were interviewed. However, none had any knowledge of graves or other heritage features situated within 50m from the road and proposed development areas.



Figure 27. Artist depiction of the abantubomlambo (www.saatchiart.com).



Figure 28. Artist depiction of sangoma being trained underwater by the mythical serpent (www.za.opera.news.mermaid).

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APPENDIX 1

WildCoast WebWorx

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28 October 2020

South African Heritage Resources Agency

111 Harrington Street
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8001

For the attention of: SAHRA CEO, SAHRA Council & Chairperson

Dear SAHRA,

URGENT APPLICATION: HOLE IN THE WALL – NATIONAL HERITAGE SITE

Hole in the Wall is one of the most uniquely beautiful locations on earth and yet, while it is unquestionably an undeclared World Heritage Site of “Outstanding Universal Value”, it has unfortunately not yet even been accoladed with National Heritage Site status. And it is not just the unique natural arch rock formation that is so special, but the peaceful surrounds comprising rolling green hills, indigenous milkwood forest, river valley grasslands and the Mpako River itself, which all contribute to its Sense of Place.

The local municipality’s Integrated Development Plan for 2017 – 2022 mentions no fewer than 7 times that Hole in the Wall is indeed a Heritage Site, but that it is not yet so declared. And it warns of the danger of uncontrolled developments, and goes further to state that it must be declared a Heritage Site. Unfortunately the Sense of Place is about to be *severely and permanently* impacted by the inappropriate imposition of a tarred roadway, widened and extended to the edge of the hillside overlooking the attraction, in such a way that vehicles peer over the edge and into the river valley, and are visibly imposed into the setting. Though not yet tarred, this is already especially severe at certain times of the day when the sun’s reflection glares off the windscreens. Besides the glare, the overwhelming feeling from the vicinity of the Hole in the Wall itself, the nearby beaches and river valley, is of jarring intrusion into what should be a secluded, peaceful and free natural environment, as Nature intended. Furthermore, the Dept. of Economic Development, Environment & Tourism (DEDEAT) has approved an ill devised notion to situate picnic tables on the grassy area over-looking Hole in the Wall. This is such a terrible idea, as besides further imposition into the setting and degrading the Sense of Place, the hillside is in very close proximity to

the river and directly exposed to the prevailing North-East wind, which will cause litter to be blown straight into the river and washed out to sea, and pollute the river valley and cliff forest on either side of the river. Despite numerous pleas to DEDEAT going back over two years, and a hand-delivered letter from the community to the road contractor's community liaison officer some two weeks ago, the Department of Transport (DOT) who are carrying out the contract, have ignored the community's request to meet onsite to discuss the simple mitigation measure of curtailing the roadway, turning circle and parking area by some two hundred metres at the watercourse before the last hillside, and using a far more appropriate, attractive and sheltered location for the picnic site. They stubbornly refuse to hear our pleas, and are hellbent on their course of senseless destruction. From this location, which is unquestionably the optimal location for the picnic site, they have raised the roadway by some 4 metres and totally impacted the views from all angles. The road should end before the culvert pipes. This goes beyond even the aesthetic impact, and will also have a hugely negative socioeconomic impact by cheapening and commoditizing the attraction solely for day-tripperbusloads and vehicles, which would provide zero to very negligible economic benefit to the community, while at the same time paving the way for further inappropriate developments.

Whereas, if the attraction and surrounds are declared a National Heritage Site, and fenced and curated appropriately as a Nature Reserve, with (possibly) a nominal entrance fee (reduced or waived for SA citizens), demarcated nature trails and kayak hire, it will create long-term sustainable benefits for the local community and also minimise as far as possible the inevitable damage to the indigenous forest and surrounds. As I wrote to the department recently, "the devastating impact can **easily be mitigated**, while at the same time **saving money** and providing an invaluable opportunity for **creating local employment**, whilst also **preserving the allure** of the attraction's Sense of Place, seclusion, privacy and freedom."

In closing I would like to stress that this is a very urgent situation as DOT are planning to complete tarring, and thereby sealing the fate of our beautiful Heritage Site, before the end of the year. Please let me know if you have any further questions I may answer.

Trusting in your understanding and looking forward to your most urgent response.

Yours sincerely,
Jeff Brown
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Coffee Bay, 5082
Wild Coast
South Africa

