

Klein Leeukop  
Heritage Impact Assessment (Section 38(8))  
Erven 2060, 2061 and 7771 Victoria Road Hout Bay  
Application for consolidation, rezoning to sub-divisional area and  
the development of a residential estate.  
Case number 15062204

1. INTRODUCTION

This is a Heritage Impact Assessment for erven 2060, 2061 and 7771, Klein Leeukop, Victoria Road, Hout Bay. It is submitted in terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) and forms part of a series of specialist studies submitted to the Department of Environment and Development Planning as part of the EIA Basic Assessment process. It is submitted to Heritage Western Cape and the South African Heritage Resources Agency for comment.

The application is made in terms of the current (2014) EIA regulations which require comment affecting specialist studies to be made prior to the submission of the final Basic Assessment Report to DEADP.

Erven 2060, 2061 and 7771 Hout Bay are situated on the upper slopes on the upper south eastern slopes of the Klein Leeukop, Hout Bay, forming part of the privately owned Leeukoppie Estate. The Estate currently comprises 10 land units of which three i.e. erven 2060, 2061 and 7771 are the subject of this report.

The site is outside the urban edge but is surrounded on three sides to the east north and the south, by single residential development. It is zoned single residential with the exception of the north portion of erf 2060 which is zoned "Agriculture"

There is low density suburban development surrounding the site to the north at the Mount Rhodes Estate, and to the south and east at the Klein Leeukop and Helgarda Estates; with the remainder of the Klein Leeukop Estate to the west. The site slopes up steeply to the north-west from Leeukoppie Road and Victoria Road. It is therefore surrounded by suburban development on three sides, roughly to the east to the north and to the south. Not all of erf 2060 is intended to be used for subdivision purposes.

The combined erven measure 15.54 ha with the affected area proposed for development measuring just over 10 ha.

Kerzner Properties Hout Bay (Pty) Ltd is proposing a residential development comprising 50 units and associated infrastructure on the three erven which are to be consolidated rezoned and subdivided. The proposal to consolidate then rezone the site to sub-divisible area in order to develop 50 residential units according to design guidelines which seek to achieve a "fit" with the surrounding low density residential environment. This requires that the proposed erven be of a similar size to those surrounding the site to the north, south and the east.

The current proposal is for a gated development of 50 units comprising between 1000 sqm to 1600 sqm per site. Each site will contain a single dwelling designed in accordance with general design guidelines prepared by Fabian Architects; and be subject to management by a design home-owners association.

In addition to the residential units; there is proposed a series of interlinked private open spaces which will be developed according to a landscape master-plan. The landscape master-plan by Planning Partners has been designed to retain some of the environmental qualities of the area; while at the same time recognising the significance of the proximity to the Table Mountain National Park and the need to create an inner environment in which biodiversity may flourish and be protected.

The sensitive upper portion of Remainder Erf 2060 forming part of the buffer strip, that not be incorporated into the development, and will be consolidated with an adjacent property, Erf 9776; and remain as one of the smallholdings that comprise Leeukoppie Estate. No development is proposed for this remainder which will be given over to biodiversity management.

Three alternatives are proposed including the “no development” option. They are outlined in Section 11 of this report; and impacts (assessed from a cultural heritage perspective) in Section 12.

## 2. HERITAGE PROCESS TO DATE

A Notification of Intent to Develop was submitted to Heritage Western Cape (HWC) on 1<sup>st</sup> February 2015<sup>1</sup> and an RoD was issued on 25<sup>th</sup> February 2015. HWC which required an HIA focussing on visual and architectural issues. The HWDC stated that they had “only a visual concern for the site”. The RoD for the Notification of Intent to Develop is attached as **Annexure One** to this report.

HWC required an integrated study consisting of a Visual Study and Architectural guidelines for the proposal. In order to develop an integrated report the VIA findings and the Architectural Design Guidelines are summarised this report (**See Sections 9 and 10**). The VIA and Design Guidelines by Gibbs saintpol (April 2015) which are referred to extensively in this report are attached as **Annexure Two**; and the Architectural Design Guidelines by Fabian Architects are attached as **Annexure Three** to this report. Conclusions and observations pertinent to cultural heritage in both studies are contained in Section 9 and 10 of this report.

The Architectural Design Guidelines which are the result of an evolving concept intended to find as coherent a “fit” as possible into the surrounding environment, attempt a visual congruity and coherence, while meeting the development requirements and ensuring the protection of the mountain edge.

## 3. THE BRIEF

The brief as identified by Chand Environmental Consultants was to undertake the following:

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<sup>1</sup> Case number 1501300 HWC.

- Undertake site visits to the site and surrounding environment;
- Undertake documentary research to assess the age and significance of any heritage resources on site and to assess whether any such resources were older than 60 years;
- Review and assess any such heritage resources on the site and identify their cultural significance;
- To grade such heritage resources
- Outline and undertake the statutory heritage mechanisms and processes necessary in terms of relevant heritage and environmental legislation;
- Liaise with the archaeologist responsible for the AIA to identify the significance or otherwise of archaeological resources on the site;
- Review the VIA in terms of impact on scenic heritage character;
- Undertake a Notification of Intent to Development and if required, undertake an HIA;
- Fulfil statutory requirements in terms of Section 38(8) and Section 38(3);
- Investigate requirements affecting the TMNP Buffer Zone area and their impact on cultural heritage;
- Investigate any other heritage related visual heritage requirements;
- Attend any professional team meetings and public meetings as required.

#### 4. THE SITE

##### 4.1. *The General Context: The Hout Bay Valley*

The site is situated in the Hout Bay Valley along its western and east facing slopes; and at the edge of the residential part of Hout Bay; with the Table Mountain National Park along the uppermost slopes of the mountain. Views towards and from the open spaces in the Valley are expansive.

The Klein Leeukop Estate comprises some 10 erven of which only three are affected by the proposal.

Hout Bay developed historically as a source of wood because of its verdant and well watered slopes; and its wooded qualities and the significance of its historic routes are still evident. This contributes to the scenic landscape qualities within the Bay and are defined by the mountain peaks.

The area has grown as a popular residential environment and tourism hub.

The Hout Bay Valley and its lower mountain slopes contain a range of residential densities ranging from very high densities of informal housing to low density suburban development; and to smallholdings on the Valley floor. Towards the west and south of Victoria Road they are generally low density villa developments on large erven with differing responses to slopes, cadastral boundaries, and orientation. The Hout Bay Valley and lower slopes are generally characterised by a strong tree canopy, a mountainous backdrop and the presence of the Bay - all which contributes to its scenic landscape character.

#### 4.1.1. The landscape character of Hout Bay

Hout Bay is a scenic historic Bay surrounded by the mountains which define it and give it a strong sense of place. It has evolved from an agricultural to a residential environment and also has a tourism function, partly dependent on its historic character and its relationship with the sea.

Important heritage resources in Hout Bay include the military forts, early farmsteads and buildings; and remnants of the fishing industry, all contained within a scenic environment and defined by the mountain slopes.



Fig One: Site location within the South Peninsula and the Hout Bay Valley. (Source: Gibbs saintpol Landscape Architects).

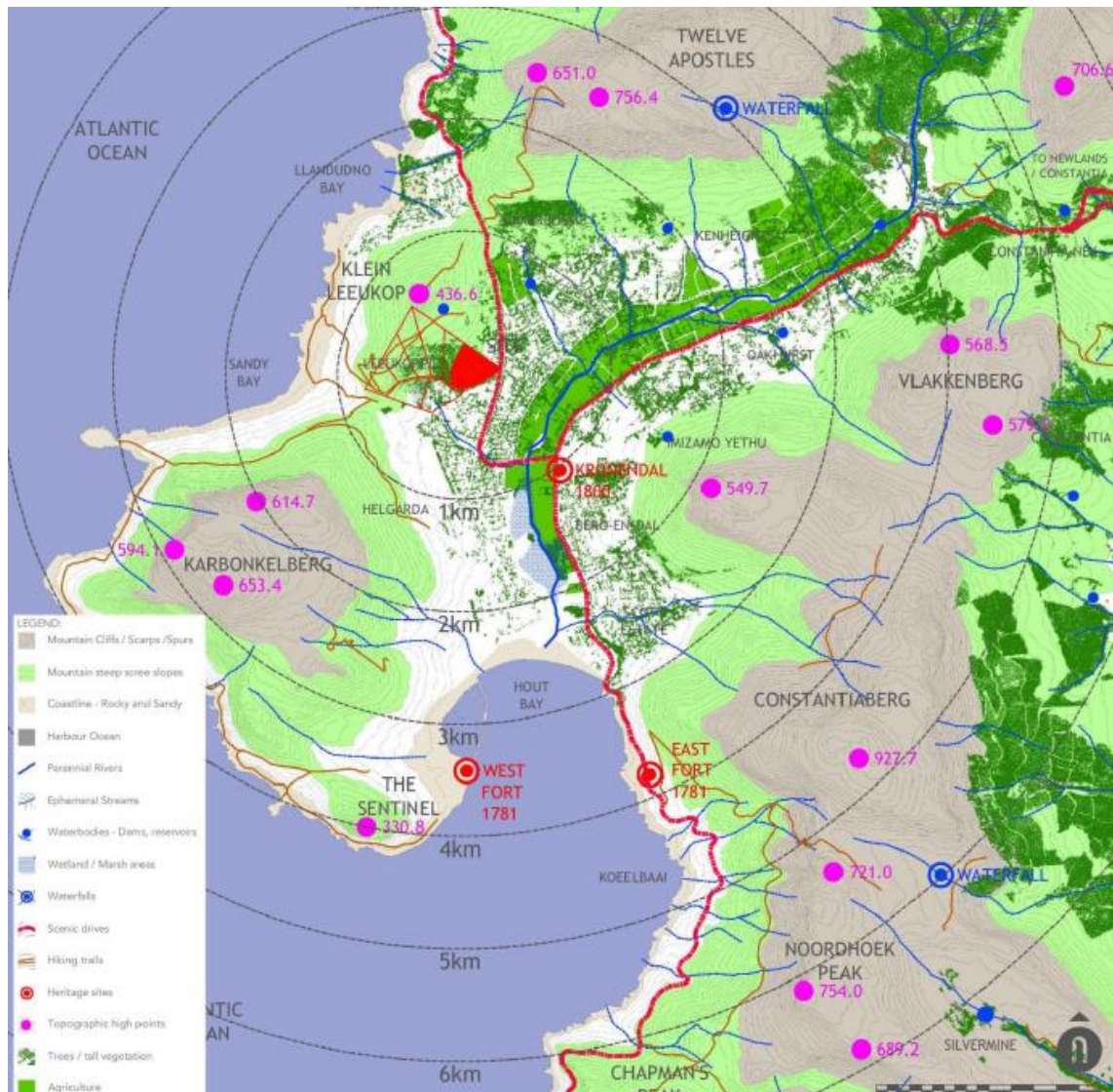


Fig Two: Identification of landscape character identifying the main routes, the Disa Valley floor, the positions of the historic forts and the mountain peaks. Peninsula (Source: Gibbs saintpol Landscape Architects)

4.2. The site



*Fig Three: Context: Aerial photograph of the Klein Leeukop Mountain with the cadastral boundaries.*



*Fig Four: The site off Victoria Road Hout Bay showing the treed avenue and the wooded nature of the plantation. The fact that the site is surrounded on three sides by low density residential development is also strongly evident.*



*Fig Five: The proposed cadastral boundaries for the affected site and the surrounding erf sizes to the north south and east.*

Erven 7771, 2060 and 2061 form part of the Klein Leeukop Estate situated off Victoria Road, Hout Bay. The affected area, which is sloping, currently contains a plantation of cluster pines.

The site is heavily wooded with a plantation of tall pine trees with the homestead situated to the west. The residence and rest of the estate is not affected by the proposal.



*Fig Six: The treed avenue leading off Victoria Road. Historic aerial photographs show that it is older than 60 years.*



*Fig Seven: View across the site towards the Bay.*



*Fig Eight: The curving avenue of trees that defined the edge of the Estate and views of the pine plantation.*

The erven in question i.e. erven 2060, 2061 and 7771, contain no structures other than a security guardhouse at the entrance to the estate. The ascending access road i.e. Leeukoppie Road, which transverses the lower edge of the estate, is defined by a tall impressive avenue of cluster pines. The pines have been dated to about 40 years of age (Bergwind, 2014). The aerial photograph of 1945 indicates an avenue of pines which



suggests that the avenue of pine trees leading to the homestead at the least, is over 60 years of age.



*Fig Nine: A view of the pine plantation and the sloping nature of parts of the site.*

#### *4.3. Issues affecting the site*

The following should be noted in relation to the site:

The erven affected by the proposed development are not directly affected by the Scenic Drives Network and the Scenic Drive Protection Overlay Zone (SDPOZ) as the affected part of Victoria Road is not included in the SDPOZ. However the site is situated within in a general scenic area of relatively moderate to high visibility (See VIA April 2015) and proposals have responded accordingly in order to minimise visual impact as much as possible.

The surrounding residential environment was subdivided and developed relatively late, historically – in the nineteen sixties. Many of the suburban houses date from this period or later. It is therefore not a historic area although may be visible from heritage sites (See Section 8: Historical Background).The proposal plans to respond to the existing surrounding suburban housing model of houses set within expansive grounds and which will be well treed over time.

The current house is off the site on another erf and has been substantially rebuilt. It is not part of the application nor is it older than 60 years.

The site is not a protected heritage area and there are no heritage resources on the site. An avenue of pines is the most noteworthy landmark feature. There are no structures on erven 7771, 2060 and 2061 apart from the existing modern guardhouse which has no heritage significance. Its value lies largely in its landscape qualities which area analyzed in full in the VIA (2015) **(See Annexure Two)**.

The sites in question fall outside the urban edge but is an anomaly as it is surrounded on three sides by residential development. An application to amend the urban edge is currently underway with the City of Cape Town.

#### 4.4. *The Table Mountain National Park (Buffer Zone)*

An erf i.e. erf 2060 site is listed as one of a series of buffer sites surrounding the Table Mountain National Park. A portion (the western portion of erf 2060 – the part furthest away from the buffer zone - is included in the three portions forming part of the application). The proposal is to include this portion in the consolidation with the area closest to the Park remaining undeveloped and being consolidated with erf 9667 which is excluded from the development proposal.

The Table Mountain National Park Proclamation is part of the World Heritage Site “Proclamation of the Cape Floral Region as a World Heritage site”.<sup>2</sup> The Table Mountain National Park is a grade 1 heritage site as well as a World Heritage Site (WHS) as part of the serial designation as the Cape Floristic Kingdom Bi-ome. The Cape Floral Region is a series of eight natural bi-omes throughout the Western Cape including the Table Mountain Park. The sites were designated in 2009 as a natural world heritage site. All eight sites would contain buffer zones for reasons of biodiversity protection.

Universal significance is ascribed in terms of natural rather than cultural or cultural landscape qualities. In terms of this listing scenic qualities are not included as a management imperative.

The eight sites are identified as exhibiting “Outstanding ecological and biological processes associated with the Fynbos vegetation which is unique to the Cape Floral Kingdom”. “The outstanding diversity, density and endemism of the flora are among the highest worldwide. Unique plant reproductive strategies, adaptive to fire, patterns of seed dispersal by insects, as well as patterns of endemism and adaptive radiation found in the flora, are of outstanding value to science.”<sup>3</sup>

The sites were inscribed in terms of the following criteria:

Criterion (ix) as representing outstanding universal value in terms of “ongoing ecological and biological processes associated with the evolution of the unique Fynbos biome”;

Criterion (x).Rarity The Cape Floral Region is identified as one of the world’s 18 biodiversity hot-spots.<sup>4</sup>

There is a requirement for natural heritage sites to possess an outstanding degree of integrity which is protected by a dedicated management plan. In the case of the Table Mountain National Park this is the Table Mountain Management Plan, which serves as a guide to current and future management of the Park.

The buffer zones are **excluded** from the listing of the WHS and from the related management plan, having a separate regulatory framework (see below).

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<sup>2</sup> Government Gazette No 31832 30<sup>th</sup> January 2009

<sup>3</sup> <http://whc.unesco.org/en/list/1007>

<sup>4</sup> The criteria for the nomination have been listed here, as there is a common misperception among the public that “heritage” in this instance refers to “cultural heritage” as well. It does not.

Erf 2060 is not part of the Table Mountain National Park and not managed by SAHRA in terms of Section 27(18) of the NHRA. It is privately owned and carries existing single residential property rights. However erf 2060 is identified as a buffer zone to the TMNP as a WHS. Therefore the regulatory framework identified for buffer zones i.e. those contained in Government Gazette 31832, which are intended to prevent the spread of alien vegetation into the Park, have applicability.

It is proposed that the north west portion of this site, the area closest to the TMNP be subdivided from the site and consolidated with erf 9776, and remain as one of the smallholdings that comprise Leeukoppie Estate.

#### *4.5. Cultural Heritage Significance in terms of the Buffer Zone*

The Table Mountain National Park - forming part of the Cape Biome is of outstanding (international) natural heritage significance. This report concludes that if the Regulations pertaining to the protection of bio-diversity are adhered to in the affected buffer portion i.e. the upper north-west portion of erf 2060, there are no cultural grounds to preclude the development of a portion of erf 2060 which is largely covered by alien vegetation anyway.

## 5. STATUTORY REQUIREMENTS

### *5.1. Statutory Environmental Requirements: National Environmental Management Act.*

A Basic Assessment Report is triggered in terms of the Environmental Management Act (as amended). This is as a result of the requirements contained in Government Notices R983 and R985. A Basic Assessment Report supported by relevant specialist studies was required.

The specialist studies relevant to the HIA are the following:

- Botanical Constraints Analysis undertaken by Bergwind Consulting 2014
- Visual Impact undertaken by Gibbs SaintPol 2015
- Archaeological Impact Assessment undertaken by Ute Seeman Consulting Archaeologist 2014
- Heritage Impact Assessment undertaken by Melanie Attwell and Associates

### *5.2. Statutory Heritage Requirements Provincial Level: Heritage Western Cape*

The Provincial Heritage Authority oversees the requirements affecting heritage impact assessment. This HIA forms part of a basket of specialist studies within the framework of an Environmental Impact Assessment - (Section 38(8)). Since a Basic Assessment Report is triggered in this instance, the HIA is part of the EIA (BAR) process. The heritage authority i.e. Impact Assessment Review Committee of Heritage Western Cape is a commenting body only and the authorising agency is the Department of Environmental Affairs and Development Planning (DEADP) who would issue the RoD.

#### *5.2.1. The Heritage Requirements*

#### *5.2.1.1. Section 38(1) Notification of Intent to Develop*

The National Heritage Resources Act (Section 38) (1) requires that a heritage impact assessment (HIA) be undertaken if the proposal contains triggers as follows<sup>5</sup>.

- (a) The construction of a linear development exceeding 300 metres in extent
- (c) any development or other activity which will change the character of a site-
  - exceeding 5 000 sqm in extent
  - involving three or more existing erven or subdivisions thereof;
- (d) rezoning of a site exceeding 10 000 sqm in extent.

A Notification of Intent to Develop was submitted to HWC and the RoD containing specific requirements relating to visual and architectural issue is attached as **Annexure One**.

#### *5.2.1.2 Section 38(8) and Section 38(3) Heritage Impact Assessment*

Should the heritage authorities have reason to believe that heritage resources would be affected by such a proposal they would require that a HIA be undertaken (Section 38[2]). In terms of NHRA Section 38 (3) the report must address:

- (a) The identification and mapping of all heritage resources in the area affected;
- (b) An assessment of the significance of such resources as set out in the NHRA;
- (c) An assessment of the impact of the development on such heritage resources;
- (d) An evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;
- (e) The results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;
- (f) If heritage resources will be adversely affected by the proposed development, the consideration of alternatives; and
- (g) Plans for mitigation of any adverse effects during and after completion of the proposed development.

#### *5.2.1.3. Archaeology and Palaeontology (Section 35 NHRA).*

An archaeological study has been undertaken by Dr Ute Seeman (2014) and no archaeological resources identified on the site. Archaeological requirements therefore have been met.

In addition the RoD arising out of the Notification of Intent to Develop has specifically requested that the emphasis of the HIA be on integrating visual and design concerns in order to minimise impact on the surrounding environment.

#### *5.2.1.4. Conclusions arising out of the Provincial Statutory requirements;*

The sites have been identified as having certain triggers i.e. three or more existing erven, sites over 10 000sq metres in extent and development that will change the

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<sup>5</sup> Only the relevant triggers are listed

character of a site on which heritage resources may be affected. Section (Section 38[1]) therefore has relevance.

It should be noted that apart from the avenue of pines, there are no heritage resources on the site and none affected by the proposal.

### *5.3. Other potential statutory constraints: Municipal Level: City of Cape Town*

#### *5.3.1. The Heritage Protection Overlay Zone (HPOZ).*

The Southern District (page 6/2013): No HPOZ exists for Hout Bay and therefore the general and specific conditions of the HPOZ do not apply

#### *5.3.2. The Scenic Drive Overlay Zone (SDOZ).*

The Council sets general and/or specific conditions related to designated scenic drive networks. The sites are not directly affected by the Scenic Drives Network and the Scenic Drive Protection Overlay Zone (SDPOZ) as the affected part of Victoria Road is not included in the SDPOZ. However the site is situated within in a general scenic area of relatively high visibility and the scenic value of the site has been taken into account despite this.

### *5.4. Additional Management and regulatory requirements: Table Mountain as Natural World Heritage Site: buffer zones*

The Table Mountain National Park proclamation is part of the World Heritage Site “Proclamation of the Cape Floral Region as a World Heritage site”.<sup>6</sup> The Table Mountain National Park is a grade 1 heritage site; as well as a World Heritage Site (WHS) as part of the serial designation as the Cape Floristic Kingdom Bi-ome. (See 5.4.1.)

Erf 2060 is listed as one of a series of buffer sites surrounding the Table Mountain National Park. Buffer zones are required in terms of Government Regulation 31832 (2009) to prevent the spread of alien vegetation into the Park, to protect the biodiversity of the Park and to promote “connectivity” with the Park

The National Heritage Authority (SAHRA) carries the responsibility for oversight of National Heritage Sites (Grade 1 sites) in terms of the National Heritage Resources Act.

#### *5.4.1. Operational Guidelines attached to the management of Natural World Heritage Sites.<sup>7</sup>*

Management of the Table Mountain National Park as a World Heritage Site is also guided by the Operational Guidelines of the World Heritage Convention. These guidelines refer *inter alia* to the importance of the management of buffer zones in retaining the integrity of the WHS.

The following relevant points should be noted:

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<sup>6</sup> Government Gazette No 31832 30<sup>th</sup> January 2009

<sup>7</sup> Operational Guidelines for the Implementation of the World Heritage Convention. Feb 2005.

- The notion of “heritage” in the proclamation of a World Heritage Site in this instance refers to bio-diversity heritage significance rather than “cultural heritage significance”. The Table Mountain National Park is not designated as a **cultural** World Heritage site and its Operational Guidelines reflect its strong scientific focus in order to protect its core function – the management and protection of its unique bio-diversity assets.
- The buffer zones surrounding the eight serial nominated sites associated with the WHS including the Table Mountain National Park are intended “to facilitate functional connectivity and mitigate the effects of global climate change and other anthropogenic influences”. Their role is primarily to protect the bio-environmental integrity of the core area (TMNP). Such “functional connectivity will need to be built into the Environmental Management and Landscape Plan for the site.
- Environmental conservation management of the buffer zones and alien clearance are intended to prevent alien spillage into the core protect area. Alien clearance will therefore need to be a key aspect of environmental control of the buffer zone on erf 2060
- WHC Operational Guidelines (2005/2011) use Buffer Zones to ensure that migration of alien plant species from the Buffer Zones to the Core Site is prevented.
- Because this nomination was for a **Natural** WHS rather than a Cultural Landscape WHS, operational guidelines affect bio-diversity management only. The WHC operational guidelines carry no reference to protection of visual or heritage significance for example. In the case of the Cape Biome this severely limits the extent to which it can be protected using the World Heritage Convention.
- The Buffer Zones are excluded from the Table Mountain Management Plan which refers to the core sites only.
- Buffer Zones are not inscribed as part of the WH list. (See UNESCO World Heritage List).
- The affected buffer zones are subject to a separate Government Regulation contained in Vol 523 31832 which was separate to the WHC. No rights in terms of these regulations were removed from private ownership. However the protection of natural heritage and biodiversity are considered significant heritage constraints within a buffer zone and their management and enhancement should be built into the landscape and conservation plan for the site.

## 6. HERITAGE RESOURCES

### 6.1. *Heritage Resources on the site*

HWC required that all heritage resources be identified and assessed as part of the HIA. All three affected erven contain no buildings older than 60 years, no known or identified archaeological sites and no other cultural heritage sites.<sup>8</sup>

### 6.2. *Cultural Significance*

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<sup>8</sup> For the Archaeological Assessment see Seeman U, Archaeological Impact Assessment Leeukoppie Estate Hout Bay, 2014.

Cultural significance is defined in the National Heritage Resources Act as “aesthetic, architectural, historical, scientific, social, spiritual, linguistic, technological value or significance.

It is argued that the avenue of pines leading to the house is of some contextual significance and contributes to the aesthetic qualities of the area. However there are no other heritage resources on the site or near the site which may be impacted by the proposal.

### *6.3. Grading of heritage resources*

There is, however, an avenue of historic (older than 60 years) pines leading from Victoria Road to the homestead which are considered a conservation worthy part of the cultural landscape. The avenue can be considered as being of local contextual significance and contributing to the scenic landscape character of the area. As a result it is considered that a grade 111C grading would be appropriate.

This avenue is to be retained and is unaffected by the development proposal.

The archaeological significance of the site was also deemed to be low.<sup>9</sup> No archaeological remains were observed and the recommendation was that permission to proceed with the development be granted by HWC.

### *6.4. Conclusions*

In terms therefore of Section 34 of the National Heritage Resources Act, and Section 35 (NHRA) there are no significant heritage constraints other than the presence of an avenue of pine trees older than 60 years which have been graded in this report as a 111C and are to be conserved. They are therefore not adversely impacted upon by the proposal.

There is a broader constraint relating to visibility, visual exposure, and scenic character and landscape settings. These may be considered of cultural significance as they are of value to many. Such assessments are undertaken in the Visual Impact Study (VIA 2015) and mitigations proposed, which are endorsed by the report.

## 7. ASSUMPTIONS AND LIMITATIONS TO THE STUDY

The following assumptions were made:

- That the supporting information provided by others was correct.
- That the significant issue of biodiversity assessment and management of the buffer zone was considered outside the scope of the cultural heritage study and would be assessed within the BAR.

The following limitations to this study were assumed:

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<sup>9</sup> Seeman U AIA 2014.

- That non-heritage related processes necessary for the proposal would be undertaken by others
- That in the absence of heritage resources on site, the application to move the urban edge would be considered a planting issue;
- That the heritage assessment was undertaken on the basis on the information provided by the date of the compilation of this report.<sup>10</sup> As the proposal is an evolving concept and public input is yet to be formally undertaken; aspects of the proposal, may change was new circumstances or opinions present themselves. The preliminary architectural design guidelines have been reviewed, for instance but may evolve further as a concept.

## 8. HISTORICAL BACKGROUND TO THE SITE

### *8.1. General historical background*

The history of Hout Bay including the history of the affected erven is closely associated with the history and subdivision of Kronendal, which extended from both sides of the Disa-Hout Bay River to the mountain peaks of Baviaanskloof and Little Lions head towards Llandudno.<sup>11</sup> As Kronendal was subdivided, smaller farms came into existence along the Disa River and residential subdivisions followed. Erven 7771, 2060 and 2061 have their origins in the Hout Bay Extension 8 Scheme of 1952. This contained a large erf i.e. erf 2056, originally consisting of a number of erven, which was re-subdivided in 1966 forming the three erven 7771, 2961 and 2060 as part of Lenert Properties (Pty) Ltd.<sup>12</sup>

Historical maps suggest that the effected sites, which were steeply sloping, were far from a water sources and not close to a major access route; and subsequently remained undeveloped until the mid twentieth century when they were opened up for suburban development.

Mid nineteenth century farming development occurred along Valley Road Hout Bay with one of the earliest farms west of the Valley being Glomas Manor or Victorskloof Farm established in the mid nineteenth century<sup>13</sup>.

The Disa River and the vast sandy dunes extending down from the Nek remained an impediment to vehicular movement until the late nineteenth century and was crossed by a wooden bridge until the opening up of the western side of Hout Bay to traffic. This together with the sandy impediments, lack of adequate routes and steepness of the slopes explains why the area of the current Victoria Road remained undeveloped for so long.

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<sup>10</sup> By the 15<sup>th</sup> April 2015

<sup>11</sup> The Kronendal Grant was CQ 5.35 and surrounded the Ruiteplaats Grant.

<sup>12</sup> U Seeman AIA September 2014.

<sup>13</sup> The Victorskloof homestead dates to c1884.





*Fig Ten. Glomas Manor or Victorskloof Farm off Valley Road Hout Bay c 1910. This was the only significant heritage extant structure along the western part Hout Bay Valley along Valley Road. It is a considerable distance from the site under study*

There was no formal tarred road from Hout Bay to Llandudno until the construction of Victoria Road began from the Camps Bay side in 1887. Victoria Road extends from Hout Bay to Camps Bay and was built by Thomas Bain in celebration of the Queen Victoria Jubilee. It has been rebuilt, upgraded and in places realigned. Klein Leeukop was cut off from the Hout Bay Valley and the development which characterized it until the twentieth century by the sand mass that extended from Llandudno into the Hout Bay Valley. Historical development largely took place along the Hout Bay Main Road which link the settlement to Cape Town.



*Fig Eleven. Photograph of Hout Bay in 1930 showing the rural valley floor and the impediments to development along the western side of the Valley.*

## *8.2. Historical background:*

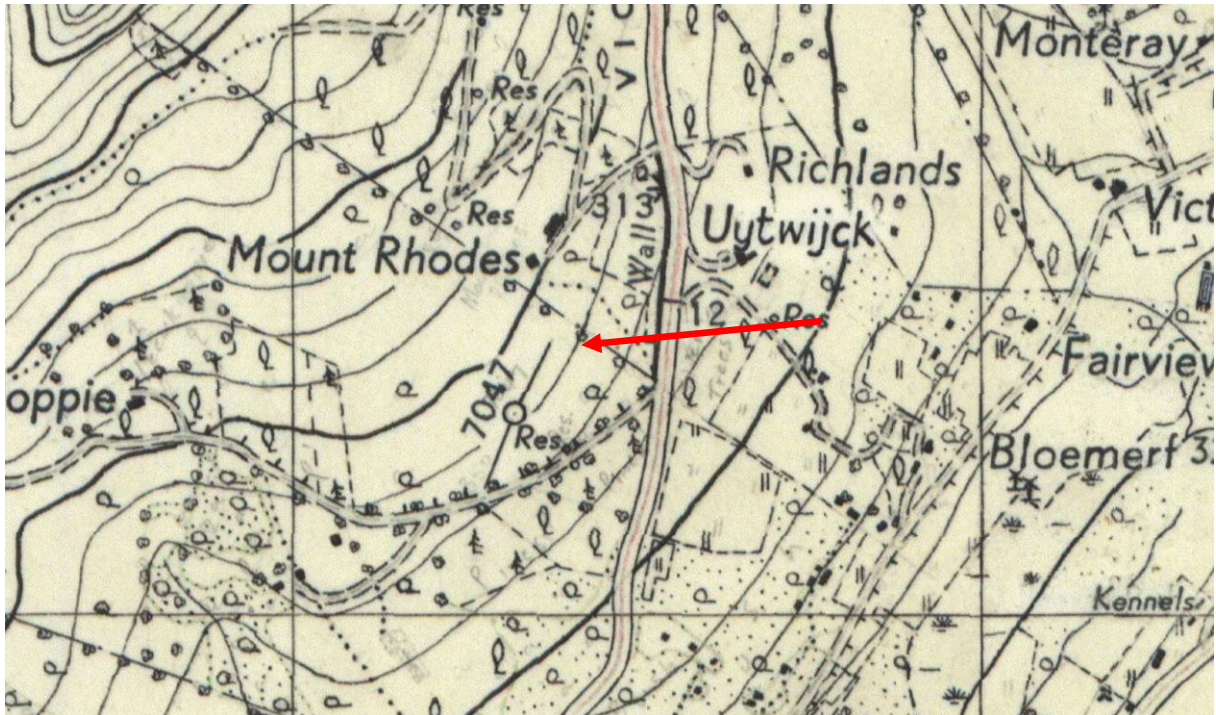
*Erven 2060, 2061, 7771: Chronological aerial photographs and maps*



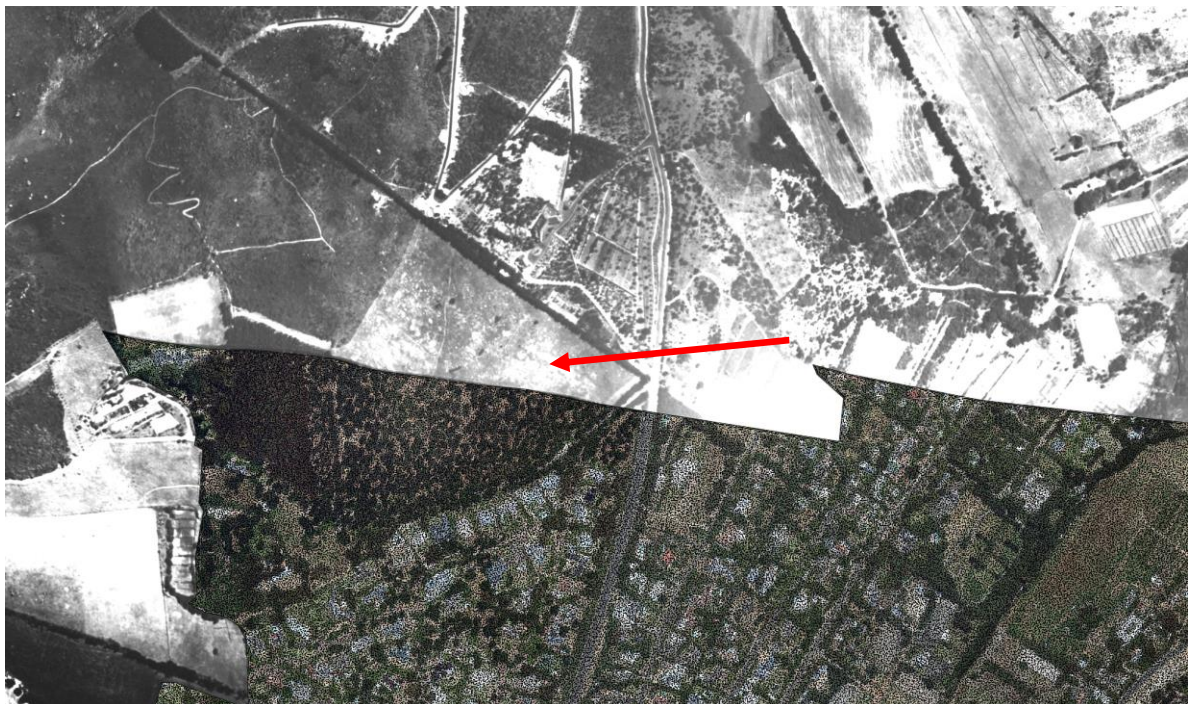
*Fig Twelve. Aerial photograph dated 2004. The strong presence of the surrounding suburban development is evident as well as the strong tree canopy and the avenue leading to the house.*



*Fig Thirteen. The site in 1988 with the beginnings of suburban development below Leeukop Estate. The plantation extends below the avenue of pines and the homestead and surrounding outbuildings, are visible.*



*Fig Fourteen. Map 1958 showing the beginnings of the Mount Rhodes Estate and the treed Avenue to Leeukoppie Estate off Victoria Road. No plantation is shown.*



*Fig Fifteen. A composite aerial photograph of 1945 and 2012 showing the presence of a developed area to the west of the affected sites with a winding access road leading from Victoria Road. This suggests that while the avenue of pines existed by 1945, the plantation did not as the mountain side is clear.*



Fig Sixteen. A composite of an existing aerial and an aerial photograph of 1938 showing a generally rural or undeveloped slope of the mountain. The early growth of the avenue of pine trees is evident but there is no pine plantation.

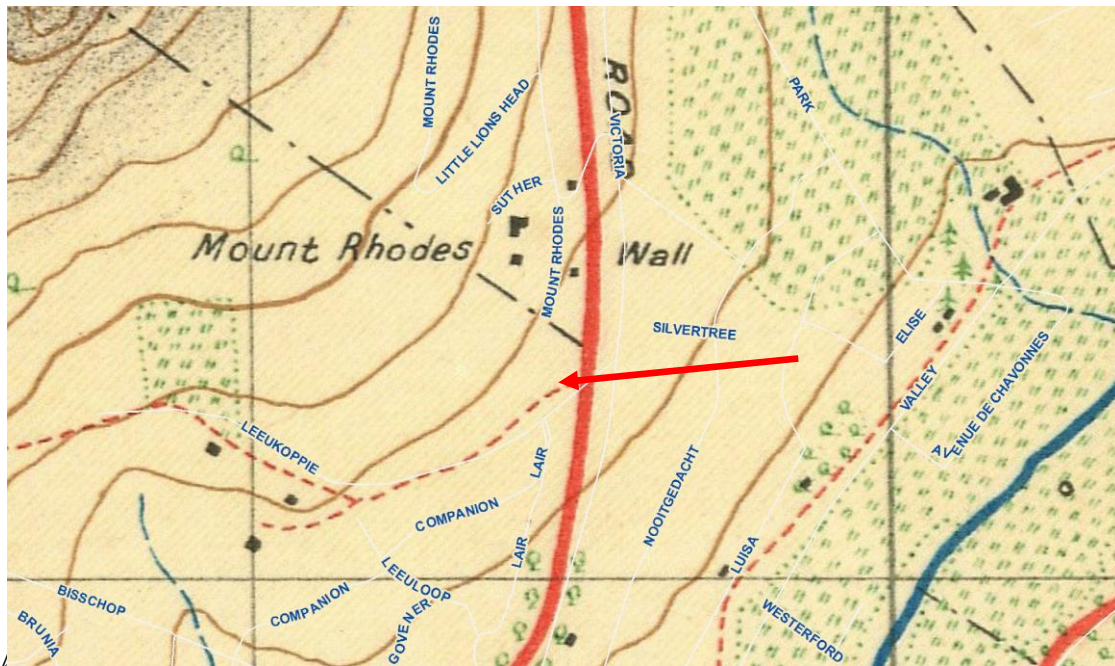


Fig Seventeen. Map 1932 showing the access road along Leeukoppie and a cultivated field. No tree growth is indicated.

### 8.3. Conclusions

From the historical material the following conclusions can be reached:

- There are no and never were any structures on erven 7771, 2060 and 2061 apart from the existing modern guardhouse

- The access avenue of pines off Victoria Road existed from at least 1938 and therefore may be construed as a landscape heritage resource. It should be retained in full.
- No plantation existed in 1945 (see aerial photograph) or 1958 which suggests that the plantation is as has been identified, in the region of 40 years of age (Bergwind 2014).
- There is no evidence in the documentary material of settled agriculture and ploughing other than the area in the vicinity of the homestead which is identified in Fig Seventeen (1932).
- The private access road called Leeukoppie Road has existed since at least 1932
- In general the western edge of Hout Bay was slow to develop due to sand barriers and lack of access and water.
- There are no heritage resources on the sites except for the avenue of pine trees which aerial photographs suggest are older than 60 years.
- There are no significant archaeological finds (Seeman 2014)
- Botanical significance is regarded as low (Bergwind 2014).
- The value of the site lies in its contextual and scenic landscape quality (Gibbs saintpol 2015).

## 9. THE VISUAL IMPACT ASSESSMENT

Heritage Western Cape required in the Notification of Intent to Develop (See Annexure One) that the HIA comprise of an integrated study combining visual analysis and architectural guidelines. As a result the Draft Visual Impact Assessment Study undertaken by Gibbs saintpol Landscape Architects (2015) is reviewed (with particular reference to cultural landscape and character aspects) in this study. The full VIA is attached as **Annexure Two** to this report.

It should be noted at the outset that the major significance of the site lies in its visual scenic contribution to the environment of Hout Bay. As a result the VIA has accommodated criteria which include a sense of place, cultural landscape assessment and the analysis of qualitative aspects of a scenic environment.

Gibbs saintpol Landscape Architects undertook an Assessment of the Hout Bay Valley based on visual impact criteria – visual exposure, visual sensitivity of the site, visual absorption capacity and visual intrusions. The focus was not only on the measurement of impact, but on an understanding of the cultural aspects of landscape; noting that “visual” implies the “full range of visual, aesthetic, cultural and spiritual aspects of the environment which contributes to a sense of place and the understanding of landscape character”.

This approach is therefore congruent with the definition of “cultural significance” as being of “aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance”; and a heritage resource being “any place or object of cultural significance”.

A major cultural resource of the site and Hout Bay Valley in general is its aesthetic significance. The VIA report also notes the dynamic nature of human settlement – that is

constantly changing; and such change patterns of human settlement contribute to its character. (Gibbs saintpol April 2015 page 14). This proposal should be considered in terms of that dynamic.

9.1. The report undertook the following:

- To identify significant issues and real values relating to visual, aesthetic and scenic resources
- To describe the proposed project in terms of form, scale massing and “fit” and to make related assessments based on “impact”
- To describe the receiving environment including landscape settlement patterns
- To identify view-sheds, view catchment areas; and zones of visual influence
- To determine the visual absorption capacity of the area
- To identify potential visual and cumulative impacts<sup>14</sup>

9.2. The VIA states the following:

- That the site is located in an area of high scenic cultural and historical significance at the interface of the Table Mountain edge and the Hout Bay Valley residential environment
- The development will affect “noticeable change” and can be defined as a category 2 development in terms of the VIA DEADP Guidelines.
- The development may be considered as being situated within a visually sensitive context and in combination of its scale and content is expected to have a moderate visual impact.

9.3. It also notes the following:

- Slopes: The site comprises a number of slope gradients mostly ranging from 1:4 to 1:6. Slopes of 1:4 and 1:6 have moderate to high visual sensitivity. Construction in these areas may be difficult and require terracing. Slopes of 1:6 have moderate visual sensitivity and are the most appropriate for aggregated structures.
- Direction. The general south east direction is expected to mean that impact is likely to be low to moderate.<sup>15</sup>
- Existing vegetation: The pines which covers the site are mature, and contribute to the historic character of the site (pg 28). The site is covered with a dense plantation of pinus pinaster or cluster pine which is a category two alien invader.<sup>16</sup> However the plantation can be described as a mature forest and provide a dense canopy to the slopes, providing screening from visual exposure.
- Visual Impact of proposal from other special features and resources: The following historic features will be visually affected in that the proposal will be visible from them: East Fort (low impact and partial), M63 route from Constantia to Hout Bay. There will be almost no noticeable view from Victoria Drive and the site will not be visible from Kronendal.<sup>17</sup>

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<sup>14</sup> Gibbs saintpol page 13 2015

<sup>15</sup> Gibbs saintpol page 20 2015

<sup>16</sup> Conservation of Agricultural Resources Act 43 of 1983 as amended

<sup>17</sup> Gibbs saint pol page 28

#### 9.4. Visual Impact reduction informants.

The report contains the following informants for the reduction of visual impact in terms of the proposal:

- Reduction of impact: The following should be carefully considered: access routes and roadways involving excessive cuttings, discordant linear features;
- Buildings surrounded by a vegetated buffer strip; articulated and aggregated buildings rather than single monolithic slabs, buildings built into slopes rather than on stilts; building heights to be controlled and should not exceed 7 metres above natural ground level
- Glare reduced by non reflective glazing
- Vegetative screening will provide a significant mitigation and should include: flow of patterns of vegetation throughout the site. Where possible to retain or replant dense overhead vegetation to improve screening.
- Location of buildings on site should be carefully considered to minimise impact, paved areas to be screened or minimised.

#### *8.5. Assessment of Impacts.*

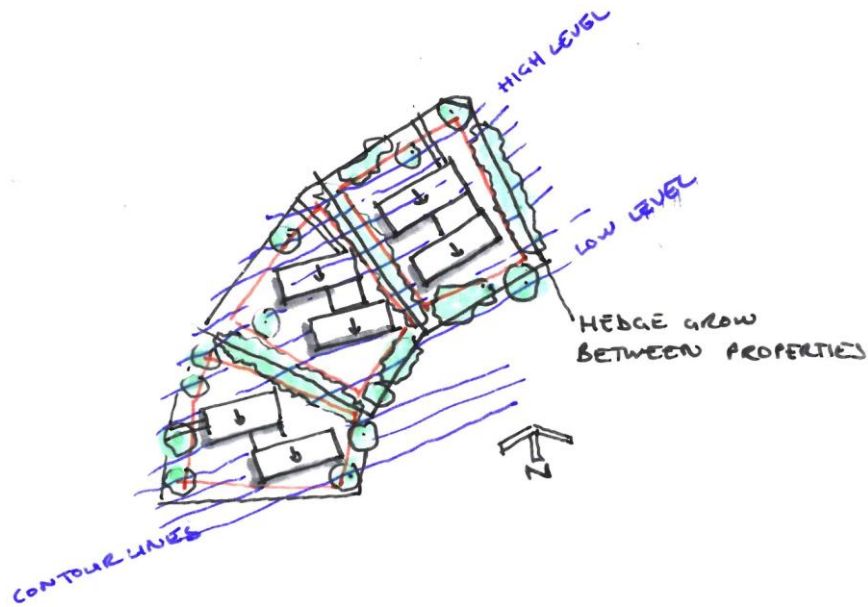
The VIA finds that Alternative One (the preferred alternative) (See Section 10: Gibbs Saint Pol) is the most compatible with the landscape character at the urban edge. Alternative One is also regarded appropriate in terms of open space protection, ecological diversity and scenic sensitivity. It is considered as having a comfortable “fit” being visually congruent with the surrounding residential environment, being supported as it is on three sides by such an environment.

This report (HIA endorses the findings summarised above.

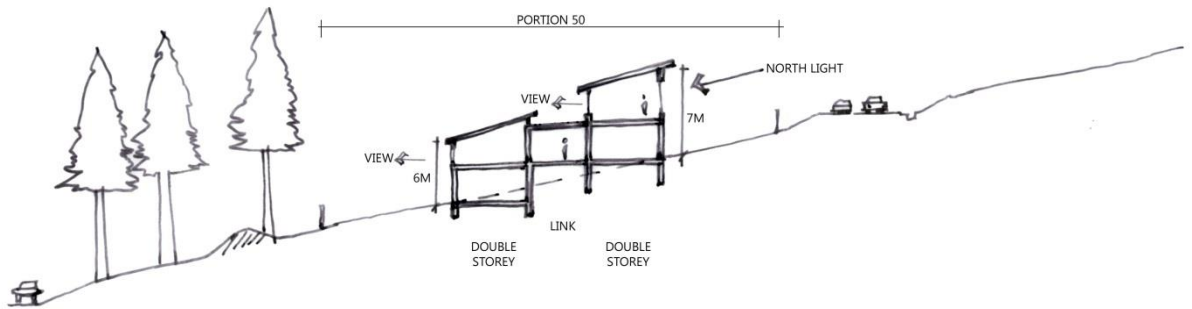
### 10. ARCHITECTURAL DESIGN GUIDELINES

Heritage Western Cape required in terms of the response to the Notification of Intent to Develop issued on 25<sup>th</sup> 2015 February, that the heritage study integrate visual aspects including the VIA and the Architectural Design Guidelines into the study. The architectural guidelines which were compiled by Fabian Architects (April 2015) provide a conceptual framework for the residential development of the site. This is attached as **Annexure Three** to this report.

It was proposed as a first principle to seek as congruent a “fit” with the surrounding residential environment as possible. It was noted that the site was surrounded on three sides by residential development of a low density suburban nature. Consequently properties will be single villa developments situated within spacious grounds similar to the surrounding properties. Sitings and placements of houses are to be loose and individualised as to best suit the unique constraints of each particular erf.

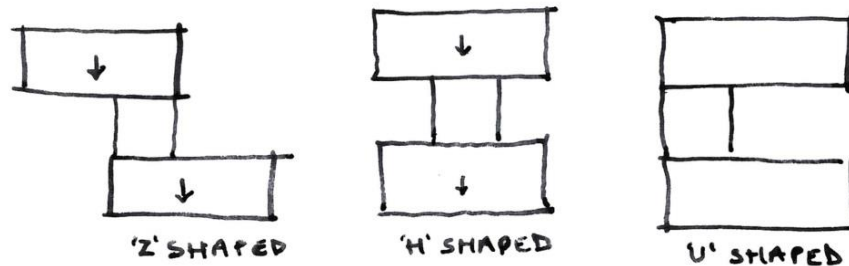
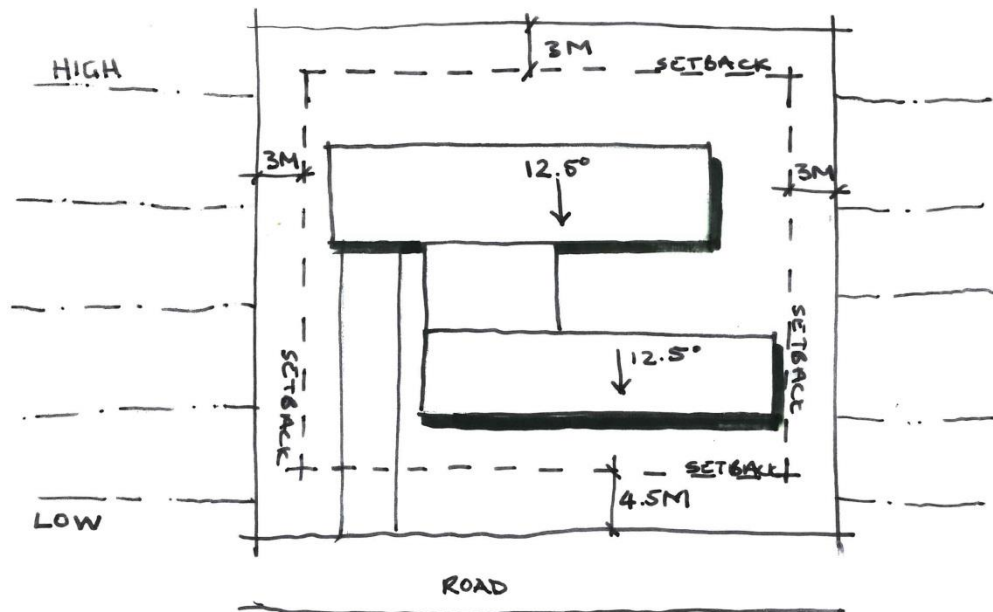


*Fig Eighteen: The Guidelines proposed a coverage of 40% of the site. Siting will take the nature and topography of the slope into account. They will employ substantive vegetative screening and canopies. Roof pitches are proposed to be parrallel to the fall of the site*



*Fig Nineteen: Sketch indicating that a buffer zone of trees is to be retained along Leeukoppie Road and that the Avenue of trees is to remain partly as a screening measure and partly as a significant and defining landscape element. The sketch also proposes a vegetated berm to further enhance screening. This also shows that that the guidelines ensure that the height will not exceed 7 metres about natural floor level. Should there be hedges or fences they would need to be low or otherwise comprises and intrusive horizontal element.*





*Fig Twenty: This indicates that the scale form footprint and envelope are to be varied to reduce visual impact. The Design Guidelines comprises a series of composite rectangular forms, following the contours of the site and connecting major forms and elements with minor ones. Steeply pitched roofs are not proposed.*

#### 10.1. Impact on the character of the landscape

- The conceptual approach to informing design decisions is drawn from the site. Topography falls with the views, to the South to South East, contrary the optimum building orientation to the North. To this end the Design Manual aims to provide a framework that encourages maximizing views and orientation, providing diversity, whilst maintaining harmony through integrating common elements of roof, plinth and boundary walls with complimentary material and colour.

#### 10.2. Management of adherence to the Architectural Design Guidelines

- A Leeukoppie Design Review Committee is to be formed and all designs in sketch form would require to be reviewed by such a Committee.

#### 10.3. Architectural Design Principles:

- Create a healthy, comfortable environment that is in harmony with its surrounding community, natural and built environment.
- Maximise views, orientation and privacy, whilst considering orientation, weather and wind direction
- Selective use of natural materials and colours
- Integrating building with landscaping and trees
- Environmentally sound design principles
- Encourage sustainable operating and low maintenance costs
- Encourage the inclusion of energy saving and recycling systems, and appropriate landscaping and terracing
- Cohesive roofing colour tones
- Cohesive stone plinths
- Provide a landscaped and treed green corridor between residences

#### 11. HERITAGE RELATED DESIGN INFORMANTS

The following are the proposed heritage related design informants:

- That the avenue of mature pines along Leeukoppie Road is retained as a landscape element, a defining and screening element and as a contextual heritage resource.
- That the private open spaces within the site contribute to the process of screening and the provision of a “green canopy”, which has softened the mountain edges until the present.
- That where possible, mature trees are planted in accordance with the landscape plan.
- That the issue of erf 2060 on the undeveloped remainder portion as a buffer zone be managed in accordance with the requirements as laid down in Government Regulation contained in Vol 523 31832. Alien plant species within the buffer area may be removed; and the connectivity required as a function of a buffer strip is to be protected managed and enhanced both in terms of the landscape plan, and the ongoing management of the area.
- Since much of the cultural value depends on its scenic context care should be taken to mitigate and reduce visual impacts where possible. These those identified in the Gibb saintpol VIA (2015) and include the following:
  - Reduction of visual impact by avoidance of strong linear or longitudinal cut and fill in terms of access routes and roadways involving excessive cuttings, and other discordant linear features;
  - Buildings surrounded by vegetated buffer strips and the planting of trees to replace the canopy
  - Articulated and aggregated buildings rather than single monolithic slabs, buildings built into slopes rather than an stilts; building heights to be controlled and should not exceed 7 metres above natural ground level
  - Retention of the pined avenue as a visual screening mechanism as well as a heritage resource

- Internal development of well vegetated green spaces. Where possible to retain or replant dense overhead vegetation to improve screening.
- Location of buildings on site should be carefully considered to minimise impact, paved areas to be screened or minimised.

## 12. THE PROPOSALS

There are three alternative proposals, including the no-development option.



*Fig Twenty-one: Alternative One (Preferred Alternative)*

Both development alternatives are similar and differ only in terms of access. The first alternative takes the residents' access from the lower section of Mount Rhodes Drive. This is considered the best traffic alternative. However a temporary construction access road will be built from Leeukoppie Road (the private road leading to Leeukoppie Estate). This will assist in minimising disruption to the residents of Mount Rhodes Estate during the construction process and will be removed after construction.

The proposed development of both alternatives comprises a gated residential estate of 50 residential erven with sizes ranging from  $\pm 1000\text{m}^2$  -  $\pm 1600\text{m}^2$ . Each erf will contain a single, contemporary dwelling house, which will be subject to architectural design control by a Home Owners Association. In addition there will be a series of interlinked private open spaces. These spaces will provide an ecological link from the higher lying natural area which has been identified as significant, through the estate to the

lower areas; they will accommodate storm-water detention features and will enhance the amenity of the residential plots.

The estate has an organic layout which responds to the topographic features of the site and fits in with the character of the surrounding area. The internal road system will consist of a series of cul de sac roads that wind up the site and provide access to the plots.

Entrance to the estate will be through a controlled security gate which is set inside the development area away from existing residential properties of Mount Rhodes. There will be a modest gatehouse at the entrance and provision for vehicle stacking so that congestion will not spill on to the existing public street.

The top part of the site, adjacent to Little Lions Head Road and the upper part of Mount Rhodes Drive, will be private open space and will not be developed. It is emphasized that no future development expansion is planned into the north western part of the property. The portion of Remainder Erf 2060 that will not be incorporated into the development, will be consolidated with an adjacent property, Erf 9776, and remain as one of the smallholdings that comprise Leeukoppie Estate.

In both cases the remainder of erf 2060 along the northern and west edges will not be developed forming a significant buffer edge to the mountain and to the rest of the estate.



Fig Twenty-two Alternative Two:

Alternative 3 allows for the exercise of existing single residential rights. Three villas

may be constructed with access off Victoria Road. Some portions of the pine plantation would need to be removed to allow for the development and for security as the trees are approaching senescence. In this instance the heritage resource, the avenue of trees may be affected by the access roadways. (See Fig Twenty three).



*Fig Twenty three Alternative Three: The build as right or no go option*



Fig Twenty four: The landscape plan

The landscape plan retains the historic double avenue of pines along the base of the site. This will be enhanced by the growth of yellowwood tree which will strengthen the pattern of the avenue and contribute to the cultural landscape qualities of the area.

Further new planting along treed internal avenues will in time increase the canopy and add to the tree cover. The upper north-west portion of the site which contains the link to the Table Mountain National Park remains undeveloped and is protected by a zone of trees.

Internal open spaces including areas which will be locally re-vegetated with indigenous fynbos and indigenous tree species.

There will be rock lined detention ponds and lawned play areas.

On the outskirts of the development there will be a firebreak comprised on low growing indigenous vegetation cut bi-annually to reduce the hazard of fire.

The existing pine and gum plantation will be removed and the area replanted in the area identified for development. This excludes the peripheral areas to the north-west which will retain the tree cover.

*Comment on the proposals as affecting heritage resources*

It has been ascertained that no built heritage resources exist on the affected site and

the only significant cultural landscape resource is the avenue of pine trees which is older than 60 years. The pine avenue is to be retained in both alternatives 1 and 2; and the landscape plan makes provision for the retention of the avenue in both instances.

Therefore there is no significant difference in terms of the alternatives as they affect heritage resources.

The scenic and “connectivity impact” of erf 2060 as a buffer strip is reduced as the affected portion of erf 2060 will be moved and consolidated to erf 9776 which then becomes the buffer area to the Table Mountain National Park WHS.

In considering the alternatives in terms of impact on scenic resources the Visual Impact Assessment (2015) identifies Alternative One (preferred option) as the most appropriate as it is considered the most compatible with the character of the landscape at the urban edge, has a comfortable fit and is visually congruent with the surrounding landscape.

### 13. IMPACT ASSESSMENT

Section 38(3) of the National Heritage Resources Act requires for the assessment of the development on heritage resources and if such resources will be adversely affected by the development, the examination of alternatives and mitigations

The Visual Impact of the proposal upon the site has been assessed (See VIA 2015 pp 79-82). These findings in so far as they affect a scenic environment as a heritage resource at a broad level; are endorsed.

#### *13.1. Impact on heritage resources:*

Impacts of all three alternatives have been reviewed in terms of the impact upon the identified heritage resource i.e. the avenue of pine trees. It notes that while there will be noticeable change to the character of the area as a whole and while there will be high visibility of this change in the initial stages of the development and during the construction phase, the low impact of the proposal of alternatives one and two remains unaffected. Alternative three, should it require access off Victoria Road will require the removal of parts of the avenue and therefore will have an impact on the avenue as a whole.

The avenue of pine trees is considered a heritage resource in terms of the definitions of the Act. It has been identified as a grade 111C heritage resource or a heritage resource of contextual local significance. However it should be noted that the trees are reaching the point of senescence and a gradual process of replacement (potentially with another species) will need to be further implemented. The concept of a historic avenue should however remain the same.

Loss of most of the pine tree canopy is considered to be (in cultural landscape terms) the loss of a visual amenity. However the gradual regrowth of vegetation will assist in the mitigation of this impact.

It is not affected by the proposal and thus no mitigation or assessment is required as there are no adverse impacts upon it as a heritage resource.

### *13.2. Measurement of impacts*

There were no heritage structures of significance on the site. There was however an avenue of trees which is not affected by the proposal. From a cultural heritage perspective there are no “fatal flaws”

The primary heritage significance was in the site itself, its setting and the environmental and visual constraints which have been fully outlined in the Visual Impact Assessment and the heritage related design informants. The scenic and landscape qualities were found to be of high significance. Consequently visual informants based on reducing adverse visual impact were the primary landscape informant and were fully covered in the VIA (2015).

There is a strong area of overlap with the Visual Impact Assessment. Impact on the visual qualities of landscape and impact on the landscape character as identified in the HIA are virtually the same.

### *13.3. Potential risks*

- Risk to potential archaeological resources during site clearance is low as the site is deemed to be of low archaeological significance
- Potential loss to botanical resources is low as the site has been deemed to be of low botanical significance. The site (Erf 2060) has significance in that it is identified as a buffer zone to the Table Mountain National Park. This is based in its proximity rather than its current botanical significance. Mitigation is proposed by exclusion of the area closest to the Park to the development proposals.
- Potential loss of significance vegetation during site clearance and construction is therefore considered low
- Potential loss of significant vegetation through lack of environmental management in a HWS Buffer Zone

### *13.4. The following may be identified as potential opportunities*

- Opportunity to contribute a develop a congruence in the urban edge
- Opportunity appropriate environmental control to a sensitive and scenically significant environment and at the same time develop a part of the Leeukop Estate
- Establish an appropriately designed, architecturally coherent development for a scenic environment.

### *13.5. Measurement against public consultation.*

#### Public consultation

When compared to the previous regulations governing Environmental Impact Assessments, the latest (2014) regulations are less prescriptive in terms of public participation requirements. In light of the nature of the proposal, the team, in consultation with the client, has opted for a more comprehensive public participation



strategy to allow maximum opportunities for I&APs to comment. The following public participation activities have been undertaken to date:

- Identification of potential and legislated I&APs and maintenance of a database by Chand Environmental Consultants
- Circulation of a notification letter and invitation to attend a meeting via a letter drop exercise to all residences in Mount Rhodes on 2 February 2015.
- Hosting of a series of Focus Group Meetings with the Hout Bay Residents and Ratepayers Association, residents from Mt. Rhodes and the Mt. Rhodes Security Committee between 29 January and 19 February 2015
- A meeting with various line departments of the local authority (CCT) for minutes of this meeting);
- A one-on-one meeting on 30 January 2015 with a representative from the Fitzpatrick Institute who has been monitoring the raptors on the site for the past years;
- Placement of an advertisement in The Sentinel newspaper on the 13<sup>th</sup> March 2015.
- Additional project notification to I&APs adjacent to the site, all other I&APs and potential I&APs as well as all relevant organs of) for a copy of the letter and proof of distribution);
- Compilation and distribution of a Background Information Document Compilation of a comments and responses report (Issues Trail).
- Notification to registered I&APs and organs of state of the availability of the draft BAR for review

The activities undertaken to date have elicited numerous inputs, some of which have already been considered and incorporated into the development proposal. Public participation will also be conducted as part of the town planning application, as legislated.

#### 13.5.1. Issues affecting heritage:

Heritage matters have not been a significant component of the responses where the major concerns relate to access and traffic matters. However the following responses were identified within the issues trail which required a heritage response:

Regulations affecting the buffer zones to the TMNP i.e. erf 2060. This item has been fully addressed in Sections 4.4, 4.5 and 5.4 of this report.

Whether the issue of consolidation of the three erven has been dealt with in the heritage report: The HIA report is for the consolidation, rezoning to sub-divisional area and development of the relevant erven i.e. 2060, 2061 and 7771 Hout Bay.

#### *13.6. Conclusions regarding impact on heritage resources*

- Impact on the avenue of pines is low.
- Visual impact of the proposal on the scenic landscape (with mitigation) is regarded as moderate. See VIA (2015) pp 87-92. Visual impact is likely to be highest during site clearance and construction, but as the vegetation grows and

the views moderate, the development will blend into the surrounding environment and form a coherent and seamless part of the suburban-mountain edge.

#### 14. CONCLUSIONS AND RECOMMENDATIONS

The report concludes as follows:

- The development may be considered as being situated within a visually sensitive context and with a combination of its scale and content is expected to have a moderate visual impact.(VIA 2015)
- The application to develop erven 2060 (portion) 2061 and 7771 is appropriate in that residential development occurs on three sides of the site.
- The proposal is for a residential environment of low density and is similar in density to the surrounding environment. It therefore achieves a visual congruence to the surrounding environment.
- Loss of a canopy of the plantation against the slopes will be a loss of a visual amenity but will be replaced over time by tree growth.
- The avenue of pine trees situated along the base of the site is a heritage resource as it is older than 60 years, defines a landmark avenue and has been associated with the site from at least the 1930's. The pine trees constitute a heritage resource despite their "alien" status" in this instance.
- Due to the lack of the presence of significance heritage resources the matter of the urban edge adjustment is a town planning issue and is not influenced by matters of heritage protection. It is argued that alternatives one and two present an opportunity to achieve a degree of congruence on the urban edge.
- Provided that any relevant Regulations pertaining to the protection of bio-diversity are adhered to in the affected buffer portion i.e. the upper north-west portion of erf 2060, there are no cultural grounds to preclude the development of the site which is largely covered by alien vegetation anyway.
- Of the three alternatives - both alternative two and alternative one has similar impact on the receiving environment and on the identified heritage resource. However in terms of traffic requirements and for reasons of access and safety alternative one is the preferred alternative.

The recommendations are as follows:

- That the Visual Impact Assessment attached as Annexure Two be endorsed as forming part of the visual study for the site;
- That this report be acknowledged as fulfilling the requirements of the NID i.e. for an integrated visual impact and heritage report
- That the avenue of pines be retained
- That Alternative One be positively supported.

#### 15. SOURCES CONSULTED

Bergwind Botanical Surveys and Tours *Botanical Constraints Analysis for the Proposed Residential Development Leeukoppie Estate Hout Bay, Prepared for Chand Environmental Consultants* nd.

Fabian Architects, Leeukoppie Residential Estate, Design Manual (draft) May 2015.

Gibbs Saintpol Landscape Architects *Leeukoppie Estate Proposed Residential Development: Visual Impact Assessment undertaken for Chand Environmental Consultants* 13<sup>th</sup> April 2015.

Melanie Attwell and Associates *High Level Baseline and Feasibility Study Erven 2060, 2061 and 7771 Hout Bay*, prepared for Chand Environmental Consultants October 2014.

Ute Seeman *Archaeological Impact Assessment (ALA)* for Luigi Marrai SIP Project Managers (Pty) Ltd, September 2014.

City of Cape Town Zoning Scheme Regulations 2013.

City of Cape Town Zoning Scheme Regulations 2013. Appendices.

Government Gazette Vol 523 No 31832. 30<sup>th</sup> Jan 2009.

National Heritage Resources Act (Act 25 of 1999).

World Heritage Convention Act (Act 72 of 1999).