INTEGRATED HERITAGE IMPACT ASSESSMENT IN TERMS OF SECTION 38(8) OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999)

PROPOSED RESORT DEVELOPMENT: KRAAIBOSCH 195/64, GEORGE DISTRICT



ON BEHALF OF: VIC BAY PROPERTIES (PTY) LTD

APRIL 2012

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REFERENCES and ACKNOWLEDGEMENTS:

- 1. Almond, John (Dr)
- 2. Chief Directorate: Surveys and Mapping
- 3. Cape Town Archives
- 4. Cape Town Deeds Office
- 5. George Museum Archives
- 6. Kathleen Schulz, Southern Cape Social Historian
- 7. Lynne Thompson, local Historian

ABBREVIATIONS:

- CDSM Chief Directorate Surveys & Mapping
- 2. CMP Conservation Management Plan (Archaeological)
- 3. DEADP Department of Environmental Affairs & Development Planning
- 4. KOP Key Observation Point
- 5. NHRA National Heritage Resources Act, 1999 (Act 25 of 1999)
- 6. HIA Heritage Impact Assessment
- 7. HWC Heritage Western Cape
- 8. NID Notice of Intent to Develop
- 9. PHRA Provincial Heritage Resources Agency
- 10. PHS Provincial Heritage Site

COVER: Extract from Aerial survey 140 of 1939, Flight strip 40, Image 34163 (Source: CDSM)



1. INTRODUCTION

PERCEPTION Heritage Planning was appointed by Vic Bay Properties (Pty) Ltd to compile and lodge a Heritage Impact Assessment (HIA) to Heritage Western Cape in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act 25 of 1999) in relation to proposed development of the property. Sanction for submission of this HIA was provided by Vic Bay Properties (Pty) Ltd, (registered property owners) and is attached hereto as part of Annexure 1.

This report serves as a Phase One Heritage Impact Assessment (HIA) and includes inputs from the following specialist reports sanctioned as part of the HIA:

- Historical background research Ms. Kathleen Schulz, Ms. Lynne Thompson
- Archaeology Dr. Peter Nilssen
- Palaeontological opinion Dr. John Almond

2. INDEPENDENCE OF ASSESSOR

The developer appointed SE de Kock (PERCEPTION Heritage Planning) as an independent professional heritage practitioner to facilitate the Heritage Impact Assessment (HIA) process.

With relation to the author's appointment to compile and submit to Heritage Western Cape a Heritage Impact Assessment in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act 25 of 1999), it is hereby declared that:

- This consultancy (including the author) is not a subsidiary, legally or financially, of the proponents;
- Remuneration for professional services by the proponent in relation to this proposal is not linked to approval by any decision-making authority responsible for permitting this proposal;
- Nor this consultancy, nor the author has any interests in secondary or downstream activities as a result of the authorisation of this project.

It is further hereby certified that the author has 14 years professional experience (4 years of which were abroad) as urban planner and 7 years professional experience as heritage practitioner (2 years of which were abroad). The author holds the following qualifications:

- Urban and Regional Planning (B-Tech, CPUT, 1997)
- Environmental Impact Assessment Management Heritage, Environmental (Dipl/ Masters, Dublin University, 2002)
- Architectural & Urban Conservation (CDP, UCT, 2007)
- Urban Design (CPD, UCT, 2009).

The author is professionally registered as follows:

- Accredited Heritage Practitioner Association for Professional Heritage Practitioners
- · Able to register as Town and Regional Planner with South African Council for Planners

3. BACKGROUND

This report follows submission of a NID to Heritage Western Cape by *Ron Martin* during March 2010 and its subsequent assessment by the relevant HWC Committees as summarised below (copies of HWC comments attached as part of Annexure 2):

- Record of Decision dated 19th March 2008¹:

 "HWC requires a Heritage Impact Assessment focussing on the cultural landscape issues and the visual impact of the proposed development on the site and surrounding area".
- APM decision dated 9th April 2010:

"An Archaeological Impact Assessment is required".

¹ Presumably this date is incorrect and should have been 19th March 2010



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4. METHODOLOGY

As part of the compilation of this Integrated HIA report the author has studied, visited, photographed and assessed the subject site and its environs over a period of approximately six months, which more specifically involved the following:

- Focussed archival research from relevant primary sources obtained in the Cape Town Archives and Deeds Office (independent research by historians Kathleen Schulz and Lynne Thompson);
- Field work carried out on during a five month period;
- Negotiations, discussions with consultant team regarding nature and detailed design of proposed development;
- Assimilating findings and recommendations emanating from specialist inputs into HIA by conservation architects and historical archaeologists;
- Focussed public participation process aimed at soliciting heritage-related comments from community members regarding proposed development (comments from local conservation body, interviews with current neighbours);
- · Identification of heritage-related issues and concerns;
- Analysis of development site and its environs;
- Identification of contextual spatial informants;
- Establishing cultural significance, based on criteria set out in NHRA;
- Identification of heritage-related design informants based on the above;
- Assess conformity of final proposed site layout to design informants identified.

5. DESCRIPTION OF STUDY AREA

The subject property (15,4176ha in extent) is approximately 11km southeast of George, 8km west of Wilderness and south of the N2 National road as shown with the locality plan below. The property is located within a closed-off valley, directly northwest of the coastal hamlet Victoria Bay and bounds onto an existing high-density holiday resort named "Seabreeze", as illustrated through photographs (Annexure 3) and the aerial photograph in Figure 2 below.



Figure 1: Locality of property in relation to Thembalethu, Wilderness and the N2 National road (Source: 1:50,000 Topo-cadastral series, 3422AB & 3322DC, 3422BA George, CDSM)

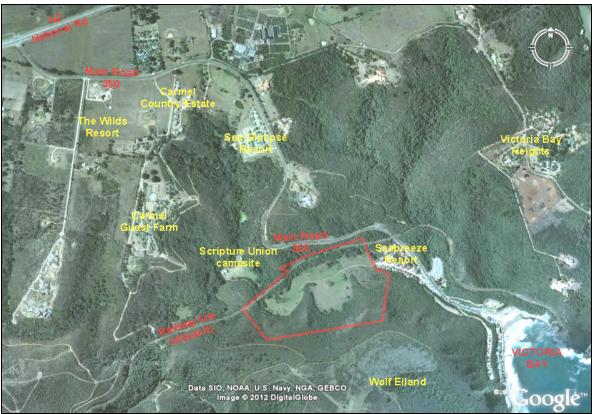


Figure 2: Property highlighted within context of existing urban/ coastal landscape (Source: GoogleEarth)

The property forms part of a narrow valley directly upstream (west) of Victoria Bay and bound by the railway line (north) and privately-owned, undeveloped property part of which is known as "Wolf Eiland", directly to the south. The railway line fell into disuse during 2003 when floods caused substantial damage to the line close to Wilderness – just northeast of Victoria Bay². Use of the railway line as a pedestrian route is not permitted. Due to excavated banks and dense vegetation occurring along Main Road 350, *the property is not visible from any point along this road.*

The geography of the site is unique in the sense that it is partly divided into three sections through two narrow ridgelines as identified in Figure 9 below. Lower-lying portions have been cleared of indigenous vegetation and are densely overgrown by kikuyu grass. Ruins noted during fieldwork include that of a small modern building, foundations of older, more extensive building and remains of a water reservoir.

An unnamed, non-perennial stream runs along the northernmost, lowest-lying section of the property. The narrow valley within which is property is located is directly north of another similar valley, which is traversed by the Molen/ Meul River (a listed Provincial Heritage Site).

A well-defined track traverses the property and extends from Seabreeze to the adjoining Scripture Union campsite to the northwest. Established legal access to the property is through the adjoining Seabreeze resort via Main Road 350. Existing land use within the direct proximity is described in Figure 2 above. Further set of photographs illustrating views along Main Road 350, railway line and within property boundaries are attached as Annexure 10.

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² Reinstatement of the Outeniqua Choo choo route between George and Knysna route unlikely due to high reparation costs. In 2010 Transnet announced that remaining Outeniqua Choo choo route between George and Mossel Bay will also be terminated

6. DEVELOPMENT PROPOSAL AND ALTERNATIVES

Early in the design process, the applicant and design team identified a number of alternative development proposals for the property and subsequently interrogated the feasibility, practicality, relevance and viability of these as described below.

6.1 No Go Alternative

This would mean that the property will be used in accordance with its current zoning, being Agricultural zone I. Access to the property through Seabreeze with tractors and related farming equipment is likely to result in significant disturbance and is therefore not considered practical or feasible. It is furthermore argued that agriculture may negatively affect the biophysical environment as this is likely to impact directly on sensitive indigenous vegetation.

6.2 Alternative One (including Boutique Hotel)

This alternative included a proposal for rezoning of the property to make provision for the following as illustrated through the conceptual site layout plan attached as Annexure 5.1:

- Boutique hotel with 20 loose-standing rooms;
- Eight Resort zone I erven for holiday accommodation units;
- Twelve Resort zone II holiday housing erven;
- Open space zone (private open space);
- Timber boardwalk to Victoria Bay;
- Access through existing servitude road.

6.3 Preferred Alternative

An application for amendment of the George & Environs Urban Structure Plan from "Nature Area" to "Recreation" for the subject property was approved by DEADP on 14th September 2011 (copy attached as Annexure 4). According to information made available to us, the proposal put forward to DEADP as part of the above application was for rezoning of the property to allow for the following (see site layout plan and conceptual architectural drawings attached as part of Annexure 5.2):

- 1 x Resort Zone I erven for 8 holiday accommodation units,
- 1 x Clubhouse and recreation facilities;
- 12 x Resort Zone II holiday housing erven:
- 1 x Open Space Zone II (private open space);
- 1 x Transport Zone I (transport usage (statutory railway reserve));
- Departure from the "Guidelines for Resort Developments in the Western Cape" for the 12 Resort Zone II holiday housing units to increase the size from a maximum of 120m² to a maximum floor area of 250m².

6.4 Routing Alternatives³

Access to the property is via a servitude right of way registered over Seabreeze (Kraaibosch 195 / 150 & 154) in favour of Kraaibosch 195/64 and Scripture Union as well as Carmel Guest Farm. Kraaibosch 195/64 has no other registered access. A legal opinion with regards to access for Kraaibosch 195/64 was obtained and supports the above.

Alternative accesses have been investigated and applied for, but with no success as these are either impractical or would have to traverse neighbouring properties all of which are not registered to the applicant. A pedestrian access over the adjoining Remainder of Kraaiboasch 195 forms part of the proposed Preferred Alternative. Access from the west over the properties of Carmel Guest Farm and Scripture Union is not practical due to the steep topography and the location of the railway line and bridge.

Therefore the only registered access for Kraaibosch 195/64 over the property of Seabreeze Holiday Resort must be used. The proposed resort for Kraaibosch 195/64 and the Seabreeze Holiday Resort should complement each other and each should experience positive spin-offs from the other.

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³ Partly transposed from Planning report, DELplan Town & Regional Planners, August 2008

7. PLANNING-RELATED GUIDELINES

7.1 Victoria Bay/ Kraaibosch South Draft Spatial Development Plan, 2009

The Draft Victoria Bay/Kraaibosch South Spatial Development Plan, a component of the Draft George Spatial Development Framework indicates the property as being part of a "resort area" (demarcated with pink). Victoria Bay and the area leading towards this well-known holiday destination have always had a tourist character that has strengthened over the years.

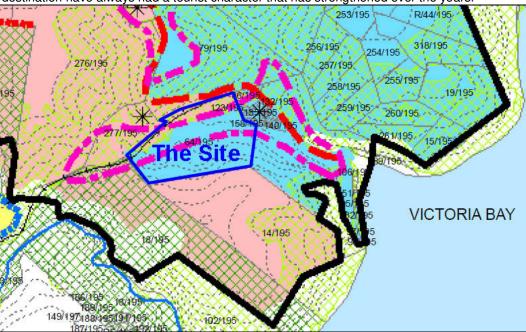


Figure 3: Extract from Plan VBKSSDP 1.2.28, Draft SDP, 2009 (Source: George Municipality)

Taken in conjunction with the above as well as DEADP's decision to approve the proposed application to amendment the George & Environs Urban Structure Plan from "Nature Area" to "Recreation", it is our view that the proposal would be consistent with the overall objective of this draft policy guideline document.

7.2 George Draft Spatial Development Framework, 2008

According to this draft (broad-based) policy guideline document, the property is located inside the "rural development edge" (black line visible on Figure 3, Section 7.2) within which it is an objective to preserve rural residential character of the area. The northern portion of the property also falls within a "regional tourism node", within which the following applies:

- Area with dominant tourism character as opposed to a conventional urban residential 'lifestyle' area. It implies that accommodation could be one of the components but not the dominant component of a project;
- Responsive architecture The objective would be to use responsive architecture, locally
 informed and capable to enhance the unique sense of place embedded in the sites
 identified.

8. HISTORICAL BACKGROUND

Historical background research focussed on relevant primary sources obtained in the George Museum Archives, Cape Town Archives, Deeds Office and Surveyor General's Office as well as existing research by local historians Kathleen Schulz and Lynne Thompson.

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8.1 Zwart Rivier 194

Though proclamation of George as town and magisterial district (named in honour of the reigning monarch, George III) took place on 23rd April 1811, one of the first loan farm entries for the farm Zwart Rivier (renamed "Kraaibosch" from c. 1903) was described as being, "this side [west] of the Kaaiman's River" and was registered at the Castle of Good Hope, Cape Town on 5th November, 1790 in favour of Jan Frederick Berends ⁴.

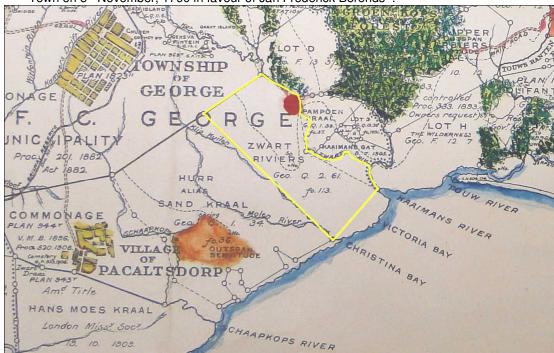


Figure 4: Original boundaries of farm Zwart Rivier transposed onto compilation of 1880-1890 SG Map. The farm name Kraaibosch appears on maps from c. 1903 onwards (Source: George Museum Archives)

Annual loan payments were not recorded on the contract, indicating an outstanding amount at the time the Quitrent was granted to Widow Berends⁵ in 1818. Census records dating back to 1809 refer to Frederick Behrens' occupation on the farm as that of a woodcutter⁶. A household inventory dated 30th January 1790, taken at the time of his death suggests that he died earlier the same year (see Annexure 6). His widow appears to have remained on the farm Zwart Rivier until she took ownership by means of the quitrent grant in 1818. The southern boundary of the farm Zwart Rivier is described as being that of the ocean, and therefore Kraaibosch 195/64 would have been included within the farm boundary. The Berends homestead depicted on the original diagram is situated centrally on the 1,434 morgen farm (i.e. well outside the subject property boundary).

The farm Kraaibosch 195 was formally surveyed and registered in 1913 (S.G. Diagram 130/1913 attached as Annexure 7) whilst the original surveyed farm name Zwart Rivier 194 was cancelled (refer S.G. Diagram 454/1818, Annexure 7) and henceforth applied to a much smaller portion of land.

8.2 Results of Deed search

The following ownership records were obtained through a deed search done in the Cape Town Archives:

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⁴ Cape Town Archives (CTA); RLR 36.2 p.517.

⁵ Note that spelling of the surname Berends (or "Behrends") varied depending on which primary archival source was interrogated

CTNA J323 (Opgaaf Series)

Year	Prop.	Title Number	Purchase	Transfer From	Transfer To	Extent
and Date	Description		Price			
1818	Farm Swart Rivier (or Zwart Rivier)	George Quitrents 2/61			Widow Jan Frederik Berends & another (P. Gerber)	1434 morgen
	ot felt significant to r owner Edwin Thom				Significant subdivisions	took place after the
1928	Lot J	1257/1928	£650	Estate late Edwin	Lewis Jonas Botha	49 morgen 320
		(diagram no. 4844/1927)		Thomas Leach Edmeades		sq.roods
	Lot M	(diagram no. 4843/1927)				117 morgen 566 sq roods.
1938	Lot J	7534/1938	£450	Lewis Jonas Botha	Hendrik Johannes Barnard	49 morgen 320 sq.roods
	Lot M					117 morgen 566 sq roods.
1942	Lot J Lot M	8408/1942	£1480	Hendrik Johannes Barnard	Charles Reginald Southey	49 morgen 320 sq.roods
						117 morgen 566 sq roods.
1949	Portion 64	10885/1949 Sub-division diagram 11835/1948	£3500	Charles Reginald Southey	Rupert Henry Blackett. (Farmer residing at Victoria Bay, born in England 1911. Declaration on	22 morgen 9010 sq. ft.
	Portion 59				Title Deed.)	15 morgen 0169 sq ft.
1957	Portion 64 Portion 59	15618/1957	£4110	Rupert Henry Blackett	Cynthia Carter Anderson (born Kirkwood, Northern Rhodesia)	As above
1960	Portion 64 Portion 59	6223/1960	£4118. 15 shillings	Cynthia Carter Anderson	John Robert Edkins	As above
1967	Portion 85	21845/1967		John Robert Edkins	Sea Breeze Estates	1 morgen. 6419 sq ft.
1979		Certificate of Registered Title 8845/1979			John Robert Edkins (for Sea Breeze Estates)	2. 7915 hectares
2003	Portion 64	63689/2003	R900,000	John Robert Edkins	Vic Bay Properties (Pty) Ltd	15.4176 hectares

8.3 Prominent occupants of the farms Zwart Rivier/ Kraaibosch

Michael O'Connell:

O'Connell, who took transfer of the property from Paul Gerber in 1843, was chairman of the commissioners who formed the George Town Council and his portion of Zwart River included Gunter's Bay which, in honour of Queen Victoria's Jubilee in 1847, he renamed Victoria Bay on his farm called Kraaibosch, the larger portion of Zwart River farm. The farm, Zwart River, was large and the name of Kraaibosch and Klein Kraaibosch was given to parts in order to identify particular areas.

Edwin Thomas Leach Edmeades:

During 1911 the farm Kraaibosch 195, and directly thereafter, Zwart Rivier 194, was purchased and transferred to Edwin Thomas Leach Edmeades. Edmeades, a prominent person from Oudtshoorn was a businessman, feather baron, expert on irrigation and entrepreneur. He owned farms in Oudtshoorn, George and Colesberg and it was at his instigation and determination that the Kamanassie Dam was built. He held many public positions in Oudtshoorn and commanded the district militia during the Boer War. His "feather palace" home was "Pinehurst" at Oudtshoorn. Edmeades subdivided and sold substantial portions of the



original Kraaibosch farm, details of which are not relevant to this report. Edmeades died in July 1925 and the heirs to his vast estate were his wife and family in Oudtshoorn. They had no interest in Kraaibosch, with the exception of a few plots at Victoria Bay, and the executors of the estate held an auction in 1927 selling all but two lots.

Outeniqua District Council:

After considerable debate the Outeniqua District Council finally made the decision to purchase the remainder of the two unsold lots after an offer made by the heirs and took transfer in 1933. This portion included the area from Victoria Bay foreshore to the southern boundary of 195/79 [now Masada] and to the western boundary of portion 195/64. Sea Breeze Estate applied for alienation of a portion of state land and became the new owners in 1967. Portion 195/102 situated on the eastern head of the Molen River on Wolwe Island, was among the unsold erven taken over by the District Council.

John Robert (Jack) Edkins:

Kraaibosch 195/64 was transferred to Edkins in 1960. He owned several other properties in the area, including "Carmel" – directly northwest of 195/64. Edkins and his wife were co-founders of "Carmel by the Sea", a Christian holiday centre and in 1983 donated the farm to Carmel Evangelical Trust. Edkins was a farmer and raised a small herd of award-winning Guernsey cows to support the ministry of Carmel. Thousands of children from all parts of the country have spent holidays there since its inception. A Christian Centre/ camping site (now "Scripture Union") has been built down in the valley, adjacent to a small dam, to provide accommodation in lieu of tents.

8.4 Road to Victoria Bay

Victoria Bay was a popular camping site from at least the 1840's (Figures 5, 6). The road from George was called the Victoria Bay Road and in constant in need of repair. The approach to the Bay was improved in 1898 by cutting back the embankment at the approach to the beach and in 1919 Mr Edmeades kindly made a deviation to make an easier gradient up the hill. The road was proclaimed a Divisional Road by Proclamation number 214 1886, 23rd December. The road is described as terminating at the high water mark Victoria Bay⁷. The significance of this proclamation is that the little bay must have been sufficiently frequented by wagon traffic to warrant such an action by provincial government at the time.





Figure 5: Entrance to Victoria Bay, c. 1890 & **Figure 6:** Camping at Victoria Bay (1st January 1928) (Source: George Museum Archives)

The responsibility by the Government for construction and maintenance of the road down to the Bay was formalised by the transfer in 1921. During the period of the construction of the railway in 1924, the road was "badly cut up by the many wagons". The incline down the hill to the beach was treacherous and was not a road for the faint-hearted. The road was gravelled in 1931 and in 1967 there were many complaints from the AA of having to tow caravans on the

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⁷ CTA; PWD 2/5/161

dirt road up the hill. Finally, in 1973, the present road was constructed with a number of cuttings. There have been a number of dramatic landslips since then and on occasions the residents below the railway bridge were marooned. An alternative hazardous detour was opened from Carmel, down to the valley and through Sea Breeze.

8.5 Railway line

Construction on a new rail link between George to Knysna commenced in 1924 and Edmeades lost 107 morgen of Kraaibosch to the Government for this purpose. The camping ground on the foreshore at Victoria Bay was taken over for a construction camp in 1925 for the difficult stage between the Bay and the Wilderness. The engineers followed part of the ambitious route proposed for the road. There is an unstable section of ground at the junction of Erf 195/64, 195/277 and 195/79 directly below the bend of the Victoria Bay Road. During construction, the whole hillside came down with the loss of only tools (Refer Photograph 1, Annexure 3). The engineers were forced to make a small deviation from the intended route.

8.6 Oral history⁸

According to oral history sources, a Richard Allen kept his horses on Wolwe Island (government-owned portion directly south of 195/64) in the 1840's as the grass was sweet, but the "wolwe" (wild dogs), were a problem. Wheat "koring" was grown and stored in an open store before been sent to a mill located on the Molen River. Travellers ("togryers") from the 1880's onwards and brought Karoo goats bartered for timber to the Kraaibosch area. Historically, agriculture was a significant land use in the Kraaibosch area and farmers reportedly experienced problems associated with baboons, Vervet monkeys, puffadders, spiders and scorpions. There is still the occasional sighting of leopards.

Edmeades is said to have experimented with a variety of grasses, grains and sugar beet, that there was a change from basic crops. He brought in ostriches, pigs, cattle, Merino sheep, horses and donkeys and planted apple orchards and black wattle.

According to Adam de Swardt, Adriaan Stander farmed somewhere below the present Carmel and had rows of fig and fruit trees and crops, though the exact location is not known. In later years, Lamprecht's sons-in-law, grazed their sheep in the valley below Wolwe Island which at that time was a defined island as a river flowed on this northern side.

Grazing:

The campers at Victoria Bay came by ox wagon from the early 1800's to as recently as the 1930's. The valley within which Kraaibosch 195/64 is located was in close proximity to the beach and was used for grazing. For this reason many of the campers brought their own water in barrels to ensure a clean supply of drinking water. When Edmeades owned the property he did not allow any grazing at the Bay or environs and the oxen had to be taken "up the hill". It may have been a practical condition to protect the water supply or to protect his fields of experimental grasses. The valley was pasturelands until recent times for the cattle of later owners who built a few labourers cottages.

Stone:

Michael O'Connell, Chairman of the George Commissioners, was also on the building committee for the St Mark's Church in 1849 and owner Kraaibosch. He had suitable stone to quarry on his farm, free of charge. The exact site has not been located but has been described as being, "on the slopes below Carmel". In 1924 when there were further extensions to the now, Cathedral, Edwin Edmeades gave permission for the contractors to take as much stone as they wished from the same quarry. Additional stone was railed from Oudtshoorn.

Graves:

There is a recollection that there were family graves of the Stander/ Lamprecht family, described as being "below the old protea farm", but all traces have long disappeared and is understood to fall outside the subject property boundaries.

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⁸ Interview by Lynne Thompson with late "Oom" Adam de Swardt of Kraaibosch, 2008

A fishing boat came to grief at Victoria Bay in 1936 and two of the crew were drowned. It is believed that they were buried on the kop of Wolwe Island.

8.7 Conclusions

Having been part of the original, extensive land portion known as Zwart Rivier and subsequently, Kraaibosch, the subject property has associations with some of the prominent historic landowners, some of whom were public figures. This is considered of low cultural significance as interrogation of available primary archival sources does not confirm or even hint that one of these persons ever resided on Kraaibosch 195/64.

From historic- and cultural landscape contexts the property is associated with agriculture; construction of the local railway line and development of the coastal hamlet of Victoria Bay as local holiday destination (i.e. grazing, water for oxen used to pull holidaymakers' wagons to the beach). Oral history sources relating to possible stone quarrying and gravesites could not be confirmed through archival research or comprehensive fieldwork carried out as part of this assessment.

9. HERITAGE RESOURCES AND ISSUES

With relation to the integrated mapping of all heritage resources and/ or occurrences noted on the site please note that:

- Integrated heritage resource mapping, including the built environment, cultural landscape issues and archaeological aspects are presented through Annexure 8 as well as further supportive figures included in the text below where appropriate;
- Aspects pertaining to visual-spatial issues have been annotated through Annexure 10 as well as further descriptive figures where appropriate.

9.1 Landscape setting

9.1.1 Regional context

The property is set within an undulating coastal landscape, situated directly north of the coastline and some distance south of the foothills of the Outeniqua mountain range. The Kraaibosch farm is defined by the natural landscape along three boundaries, which include the Zwarte (or "Swart") River to the north, Molen/ Meul River (listed as a PHS⁹) to the south, and Kaaimans River/ Indian Ocean to the east and southeast respectively. The Kraaibosch western boundary is defined jointly through the eastern boundary of Glenwood as well as the Molen/ Meul River (Refer Figure 7, p.14).

9.1.2 Cultural landscape context

The term "cultural landscape" refers to the imprint created on a natural landscape through human habitation and cultivation over an extended period of time. While the Cape has been inhabited for many tens of thousands of years (pre-colonial history) prior to Western settlement (colonial history), the nomadic lifestyles of early inhabitants are not always as evident within the landscape as the significant imprints made by humans during the last two – three hundred years.

Unlike ancient landscapes in parts of the world where intensive cultivation over periods much longer than locally have allowed natural and cultural components of the landscape to become interwoven, landscape components along the Southern Cape coastline have not yet developed in such a manner. The fact that natural and cultural landscape components in the region is therefore more distinguished means that the cultural landscape is likely to be very vulnerable to the cumulative impact of any large-scale development.

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⁹ Declared on 15th December 1989, SAHRA File 9/2/030/0033

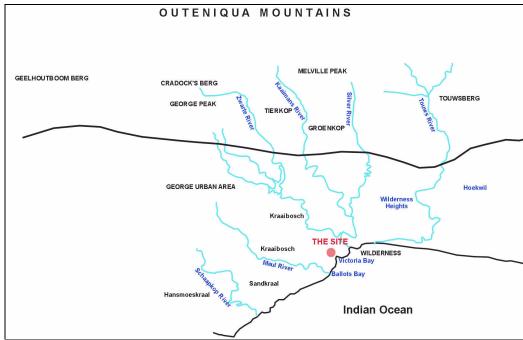


Figure 7: Diagrammatic illustration of site with its regional natural landscape setting (not to scale)

Ultimately, definition of a cultural landscape can be informed by the following elements, weighed through professional opinion, public values and statutory (legal) framework:

- Natural Landscape
- Public Memory
- Social History
- Historical Architecture
- Palaeontology
- Archaeology

Analysis of early aerial photography of the Kraaibosch area (Aerial survey 140 of 1940) reveals the following traditional (i.e. Pre-Modern) cultural landscape patterns within the proximity of the property:

a.) Aerial survey 140 of 1939 (Figure 8):

- Built form (former farmstead?) clearly distinguishable on site of current ruins/ foundations noted during fieldwork;
- Short furrow leading between said structure, remains of semi-circular structure noted and leading eastwards/ downhill towards the Bay;
- Smaller structure (labourer's cottage?) noted on western side of property;
- Historic slip-face following railway construction visible (highlighted with light blue);
- Adjoining Seabreeze property undeveloped;
- Three inter-connected pockets of the property cleared, cultivated;
- Narrow track crossing property and leading towards adjoining camping site and beyond;
- Buildings and cultivation noted at Carmel property along plateau directly west of valley within which 195/64 is located;
- Narrow track traversing hillside from Carmel to cultivated lands on Wolwe Eiland as well as 195/64 thus connecting these properties.

These site-specific patterns have contributed to the structure and character of the present landscape within this narrow valley, and elements that have survived (e.g. orientation and outline of former agricultural fields, former routes, furrows and ruins) underlie the sense of place and provide a sense of continuity.

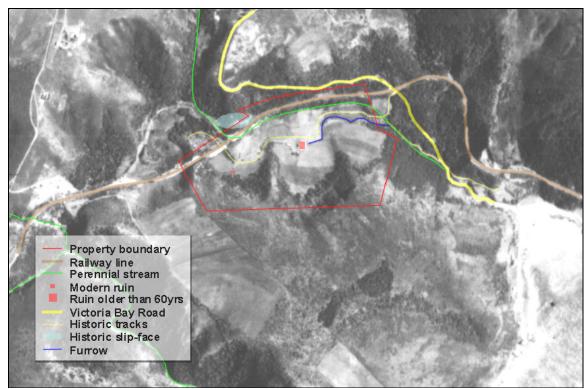


Figure 8: Analysis of Pre-Modern landscape features from 1939 aerial (Aerial survey 140 of 1939, Flight strip 40, Image 34163, Source: CDSM)

9.1.3 Urban landscape context

The property is approximately 3km southeast of a number of residential developments approved during recent years and now defines the eastern periphery of George. These include the Kraaibosch Estate and Kraaibosch Manor developments, Blue Mountain, Glen Haven retirement village, Garden Route Mall and various other similar. The property is also 500m from the Victoria Bay beach and, as illustrated with Figure 2, located within an area characterised by existing resort-orientated development. Existing resort developments include holiday houses, apartments, municipal camping grounds and associated public recreational facilities located along the Victoria Bay beachfront; the (high density) Seabreeze and Sea Glimpse resorts. Other low density resorts/ residential development include "The Wilds", Carmel Guest farm, Carmel Country Estate, Scripture Union camp site and various Guest house establishments.

It is reiterated that the property is located within a "Resort Area" as defined in the Victoria Bay/ Kraaibosch South Draft Spatial Development Plan, which would appear to have been acknowledged by DEAP's approval of the amendment of the George & Environs Urban Structure Plan from "Nature Area" to "Recreation" (refer Section 7.1).

9.1.4 Site-specific analysis

The property is located within a narrow natural valley enclosed to the north, south and west but gradually opening towards the east. The property is not visible from the nearby Victoria Bay, the access road or even the existing high-density resort (Seebreeze cabanas) directly adjacent – primarily due to its geographic location and orientation of hills and steep slopes in relation to the coastline. An unnamed, non-perennial stream meanders along the valley floor and discharges towards the coastline through the adjoining Seabreeze development. Existing wetlands as well as the 1:50 year flood line as provided to us by <code>DELplan/ Graham Savage & Associates</code> are also indicated on Figure 9, p.16.



Figure 9: Analysis of site-specific natural landscape informants (Source: GoogleEarth)

The northern and southern valley slopes are mostly steeper than 1:4 (refer Figure 9) and are overgrown by dense indigenous vegetation. However, two prominent ridgelines effectively divide the property into three shallow, north-facing coves, which together with the lower-lying valley floor, have historically been cleared for agricultural purposes. While natural vegetation is re-establishing itself within the formerly disturbed area of the easternmost cove, the valley floor and two other coves are overgrown by dense kikuyu and other grass species.

While the property therefore clearly has a unique setting and sense of place, its visibility from surrounding areas is mostly limited to the valley itself and higher-lying areas to the west (also refer Section 9.3). A number of physical and environmental constraints as mapped in Figure 9 are however applicable and should be considered in final site layout planning and architectural design.

9.2 Built environment

Structures noted on the property include the foundations of a former building, situated on a raised, level platform – roughly in the centre of the site (refer Annexure 8). The ruin is older than 60 years. The remains of stonewall foundations are overgrown by dense kikuyu grass and its locality is the same as that of ruin identified on 1939 aerial photography (Figure 8). While no photographic or archival records referring to the nature or purpose of this former building could be located, it is considered likely this had been a residence. Some archaeological investigation of the ruins (following vegetation clearing/ prior to the commencement of earthworks or construction) or possibly an old rubbish dump within the proximity may prove to be informative in terms of dating the structure or determining its former use.

The location of what appear to have been the former main building on the property, on a level terrace, elevated above the valley floor (and perennial stream) is interesting as it may allude to natural drainage pattern following periods of high precipitation. However, given the information available of this former structure at this time, it is graded as being of low cultural significance and does not need to be retained.

A second structure (most likely former labourer's cottage), constructed of modern brick and cement (plastic air vents), remains on the western portion of the property. While the upper structure is clearly not older than 60 years, stone foundations similar to that found at the larger ruin, were noted. The location of the smaller, modern ruin coincides with that of former structure noted on early (1939) aerial photography and is likely to have been reconstructed directly on top of the old foundations. Similar to the above, this structure is graded of low cultural significance and does not need to be retained.

The only other structure noted is a semi-circular wall, possibly used for damming of water, which is located at the (lower) end of an earthen furrow leading from former ("larger") structure. This structure is most likely associated with former agricultural use of the property but is considered to be of low cultural significance. No burial grounds or any other structures/ ruins noted during fieldwork, nor did archival research undertaken highlight potential sites for locating same. However, also refer to recommendations made in Archaeological Impact Assessment (Section 9.4) in this regard.

9.3 Visual – Spatial Issues

For the purpose of this Section, also refer to Figure 10 and Annexure 10. From a regional perspective, the geographic setting of the narrow valley within which the property is located is such that potentially developable areas thereof are not visible from any public vantage points, as described in further detail below. The term "potentially developable areas", for the purpose of this report, refer to portions of the property not subject to significant environmental restrictions such as steep slopes, sensitive indigenous vegetation or natural drainage lines but rather those areas formerly cleared for cultivation. For the purpose of this assessment it would therefore be assumed that no development would occur outside these "potentially developable areas".

The main access road (Main Road 350) to Victoria Bay runs along the hillside just north of the northern property boundary. However, during visual inspection along the entire route between points "A" and "B" (refer Figure 10) it was found that due to (a) the vertical and horizontal alignment of the road in relation to the property and (b) occurrence of embankments and indigenous vegetation along the southern road boundary, it is not visible from this road in both directions. To illustrate this, please refer to the series of photographs attached providing sequenced views from the Main Road 350, railway tracks and site itself (Annexure 10).

During fieldwork it was found that "potentially developable" areas of the property are not visible from public areas such as Victoria Bay and Main Road 350 to the east or the adjoining Scripture Union campsite (west) or Carmel Country Estate (northwest). Though intermittent views of the site from along the railway tracks would be possible, the railway line has fallen in disuse due to irreparable flood damage ¹⁰. Utilising established railway tracks as a pedestrian route is unlawful and we therefore consider that these altered views would not have a significant impact.

Very limited views of "potentially developable areas" from two or three Seabreeze Cabanas units located at the far western side of that development may be possible and has been tagged Key Observation Point 1 (KOP) in Figure 10. We consider this as being of a low impact.

Future development along "potentially developable" areas of the property would be visible from northern portions of the undeveloped "Wolwe Eiland" property but could not be assessed in detail as we were not able to obtain access to these adjoining lands. The only possible portion of "Wolwe Eiland" that could potentially be granted some form of development right (if any) is its upper, elevated plateau. Kraaibosch 195/64 and the "potentially developable areas" thereupon would only be visible from the very edge of this plateau. Furthermore, given the (a) the above statement, (b) the undeveloped nature of the "Wolwe Eiland" property and (c) fact that it is in private ownership and that it has no public access, we consider that any future

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¹⁰ Railway line between George and Knysna severely damaged during 2006 floods. Reinstatement of this route unlikely due to high reparation costs. In 2010 Transnet announced termination of remaining Outeniqua Choo choo route between George and Mossel Bay.

altered views from the edge of the "Wolwe Eiland" plateau would not be significant – particularly when viewed within the context of existing surrounding urban development within its proximity. The potential visual impact is therefore rated as low.

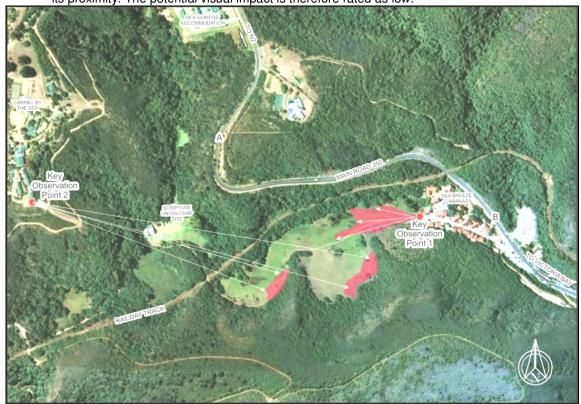


Figure 10: Potential visual impact from Key Observation Points (KOP's) (Source: Google Earth)

During fieldwork, the Carmel Guest Farm was identified as a second KOP and views from here towards the subject property are illustrated through photographs attached as Annexure 10. As further shown with Figure 10, only relatively small portions of "potentially developable" areas would be visible from the easternmost boundary of KOP 2 over a long distance – primarily due to the geographic location of these areas within the narrow valley as well as the two ridgelines, which obscures portions of the site from view. Future development of the subject property may therefore have a moderate visual impact (long distance, east-facing views) from Carmel Guest Farm's east-facing holiday accommodation units located along the natural ridgeline.

Subject to the detailed site layout and architectural design of future development of the site, we do not consider that the overall visual impact of the proposal – particularly when viewed within the context of existing urban and recreational development within its proximity, would be significant, though subject to the heritage informants and indicators set out in Section 10.

9.4 Archaeology

Parts of this Section have been transposed from the Archaeological Impact Assessment (AIA) compiled by *Dr. Peter Nilsson (CHARM)*, attached to this report as Annexure 9, and should therefore be read in conjunction with said document and its annexures for detailed analysis.

9.4.1 Executive Summary

"The AIA was conducted on 17th January 2012. The site is situated in a small valley immediately west of the Sea Breeze development adjacent to the coastal village of Victoria Bay. The bottom of the valley is thickly vegetated with Kikuyu and other grasses while the steeper slopes include coastal Fynbos species and thicket that is impenetrable. Very small patches of the ground surface are open to archaeological inspection. Due to poor archaeological visibility, it could not be ascertained whether or not the area contains artefactual

materials of prehistoric origin. In addition to the remains of a relatively modern structure, the ruins and associated features of another historic structure are overgrown with Kikuyu grass. The origin and age of these ruins could not be established through archival or deeds office research associated with the broader (HIA).

Shale deposits were observed in the study area and it is not certain whether or not these are potentially fossiliferous."

9.4.2 Findings (Stone Age and Historical archaeology)

"Due to very poor archaeological visibility, a thorough AIA was not possible. Due to significant disturbances in the lower part of the valley as well as the presence of a wetland, it is very unlikely that any prehistoric archaeological remains will be found in primary context. Nevertheless, some observations pertaining to the historic period were made.

A raised and levelled platform is situated at **Waypoint 19** (refer Annexures 8, 9). Atop the platform, mostly covered by thick grass, is a wall footing or base, a corner/wall footing in stone (shale) as well as a stone and concrete base or platform (Plate 3 [19], Annexure 9). The ruins may represent the remains of a former dwelling, but too little of it is currently visible for identification. What appear to be associated with this ruin are the remains of a stone (shale) wall at **Waypoint 20** and a semicircular brick/stone and plaster feature at **Waypoint 21** (Plate 4, Annexure 9). The latter appears to be a wall for retaining or damming water since it is located in a small streambed. However, its size and makeup suggest that it may have served a different purpose.

Table A.1: Coordinate and descriptive data for archaeological occurrences and photo localities (see Figure 3 and Plates 2 & 3, Annexure 8).

				meters
Point	Description	Datum: WGS 84 Lat/Lon	Datum: WGS 84 Grid:	above sea
Name	img=image snd=sound	dec.degrees	SA National	level
1	img4585-7 snd4587 E & S	S34.00420 E22.53734	23 Y0042741 X3764224	74 m
2	img4588-95 snd4595 W-E poss rock shelter	S34.00292 E22.53941	23 Y0042551 X3764081	66 m
3	img4596 snd4596 W	S34.00255 E22.53982	23 Y0042512 X3764040	64 m
4	img4597 snd4597 shale	S34.00227 E22.54065	23 Y0042436 X3764009	65 m
5	img4598 snd4598 SW	S34.00201 E22.54154	23 Y0042354 X3763979	62 m
6	img4599-4600 snd4600 SW	S34.00264 E22.53974	23 Y0042520 X3764049	64 m
7	img4601-5 snd4605 N-S	S34.00408 E22.53856	23 Y0042629 X3764210	67 m
8	img4606-7 snd4607	S34.00375 E22.53878	23 Y0042608 X3764174	57 m
9	img4608 snd4608 to modern ruin	S34.00395 E22.53926	23 Y0042564 X3764196	56 m
10	img4609 snd4609	S34.00351 E22.53925	23 Y0042565 X3764147	62 m
11	img4610-5 snd4615 N-S	S34.00340 E22.53954	23 Y0042538 X3764135	56 m
12	img4616-21 snd4621 NNE-SSW	S34.00272 E22.54085	23 Y0042417 X3764058	44 m
13	img4622-3 snd4623 shale	S34.00263 E22.54214	23 Y0042298 X3764047	37 m
14	img4624-9 snd4629 W-E	S34.00257 E22.54251	23 Y0042264 X3764041	38 m
15	img4630-1 snd4631	S34.00278 E22.54251	23 Y0042264 X3764064	45 m
16	img4632-4 snd4634 W	S34.00358 E22.54217	23 Y0042295 X3764153	49 m
17	img4635 snd4635 SSW	S34.00380 E22.54189	23 Y0042320 X3764178	56 m
18	img4636 snd4636	S34.00413 E22.54156	23 Y0042351 X3764215	60 m
19	img4637-46 snd4646 historic ruin	S34.00319 E22.54126	23 Y0042379 X3764110	47 m
20	img4647-9 snd4649 historic stone walling	S34.00311 E22.54152	23 Y0042355 X3764101	40 m
21	img4650-1 snd4651 historic feature/structure	S34.00300 E22.54171	23 Y0042338 X3764089	41 m
22	img4652-4 snd4654 SSE - to historic raised platform & ruin	S34.00298 E22.54133	23 Y0042373 X3764087	41 m
23	img4655-9 snd4659 E - to historic raised platform & ruin	S34.00332 E22.54058	23 Y0042442 X3764125	45 m
24	img4660 snd4660 NW	S34.00332 E22.54007	23 Y0042489 X3764126	47 m
25	img4661 snd4661 to modern structure / ruin	S34.00403 E22.53948	23 Y0042543 X3764204	52 m
26	img4662-4 snd4664 modern structure / ruin	S34.00405 E22.53935	23 Y0042555 X3764206	42 m
	img4665-6 snd4666 E toward mod structure / ruin - poss			
27	steps/terraces	S34.00413 E22.53872	23 Y0042614 X3764216	55 m
28	img4667-73 snd4673 W-E to modern structure / ruin	S34.00430 E22.53925	23 Y0042564 X3764234	65 m

Significance and Recommendation: The raised and levelled platform with ruins and the associated features described above – waypoints 19, 20 & 21 - are considered to be of low significance because the former structure(s) was likely demolished in the recent past. As a result, there are no recognizable architectural features. It is possible that cultural remains – potentially in a refuse dump – associated with the ruins are currently covered by grass, and that their nature will give an indication of the time period when the former structure was in use.

It is recommended, therefore, that archaeological inspection should be conducted after the area is cleared of vegetation.

A disused and partially ruined structure was recorded at **Waypoint 26** (Figure 3, Plates 1, 2 & 4 and Table 2, Annexure 9). Wall footings are stone (shale) while walls are brick and plaster. Adjacent to the dwelling is a brick and plaster water tank/reservoir that suggests that the original building/foundations may be older than 60 years. Modern features such as brick, mortar and plaster as well as ventilation ducts strongly suggest that the original structure was significantly altered in recent times. According to Mr de Kock, early aerial photographs from around the 1940's show that a structure did exist where this structure stands today.

Significance and Recommendation: The structure at waypoint 26 is considered to be of low significance as it has no unique or distinguishing architectural features and that it has undergone substantial alteration in recent times. As with the ruins at waypoint 19, cultural remains may be associated with this structure and these may give an indication of the period when the earlier structure was inhabited. It is recommended, therefore, that archaeological inspection should be conducted after the area is cleared of vegetation.

Shale deposits were observed in several places in the study area of which Waypoints 4 and 13 are examples (Figure 3, Plates 1 & 3 and Table 2, Annexure 9). Because shale deposits are often fossiliferous, it is recommended that a Palaeontological Impact Assessment (Desktop Study) be undertaken prior to the construction phase to establish whether these shales may bear fossils that are of scientific value".

9.4.3 Recommendations and Mitigation measures

Recommendations:

- Archaeological inspection should be undertaken by a professional archaeologist after vegetation clearing associated with the development in order to determine whether or not any cultural remains or burials are associated with the ruins and existing structure;
- A Palaeontological Impact Assessment (Desktop Study) should be conducted to determine whether the shale deposits are potentially fossil bearing.

Required Mitigation measures:

- In the event that vegetation clearing and earthmoving activities expose archaeological materials, such activities must stop and Heritage Western Cape must be notified immediately;
- If archaeological materials are exposed during vegetation clearing and/or earth moving activities, then they must be dealt with in accordance with the National Heritage Resources Act (No. 25 of 1999) and at the expense of the developer;
- In the event of exposing human remains during construction, the matter will fall into the domain of Heritage Western Cape (Ms. Jenna Lavin) or the South African Heritage Resources Agency (Ms Colette Scheermeyer) and will require a professional archaeologist to undertake mitigation if needed.

Table A.2: Potential impact on and loss of archaeological resources with and without mitigation

	With Mitigation	Without Mitigation
Extent	Local	Local
Duration	Permanent	Permanent
Intensity	Low	Low
Probability	Low	Unknown
Significance	Low	Unknown
Status	Unknown	Unknown
Confidence	High	High

10. HERITAGE INFORMANTS AND INDICATORS

According to the requirements of Section 38(3) of the NHRA it is crucial that the land use planning and EIA processes be informed by and incorporate heritage informants and indicators as done through the mapping and grading of relevant heritage resources in Section 9 of this report. It is the purpose of this Section to define heritage informants and indicators pertaining to the way in which heritage resources must be incorporated into the overall design of the proposed development and should therefore be read in conjunction with Annexure 8 (Integrated heritage resource mapping).

10.1 Built environment

- Unfortunately, information with relation to use and built form of the former structure older than 60 years, the ruin of which is situated on an elevated platform on the property, could not be located. While some further archaeological investigation could possibly provide more information as to the age of this structure, we do not consider it necessary to retain this structure as part of future development of the site;
- Similarly, other structures noted (including the semi-circular wall and ruin of modern cottage) are not considered to be of any cultural significance and therefore do not have to be retained.

10.2 Landscape issues

- Lower-lying portions of the property have been cleared most likely through former agriculture/ cultivation, which has long-since been discontinued. The landscape transformation through historic agricultural activities therefore remains evident within the landscape but is not considered to be of cultural significance.
- The natural drainage line traversing the lowest-lying section of the valley floor (as well as elevated nature of terrace upon which former structure older than 60 years was situated) highlights the need for adequate setback for any future development from the 1:50 year flood line. The site layout should be setback from natural drainage lines and make sufficient provision for accommodation and management of natural run-off;
- The three interconnected shallow coves described in this report render a unique sense of
 place to the property, which should be appreciated within a site layout. An attempt should
 be made to cluster structures within these shallow coves in such a manner so as not to
 visually dominate these spaces;
- The above principle (avoid buildings from visually dominating natural sense of place) should be further expressed in the architectural design as limiting structures to single-storey split-level height and in favour of split-level floor plan layout;
- Future development should avoid slopes steeper than 1:4 as these areas (mapped in Figure 9) are predominant overgrown by indigenous vegetation, which significantly contributes to the overall setting of the place.

10.3 Visual-spatial issues

- Given its location within a narrow, largely isolated valley, the overall visual impact of the
 proposed development is considered low. This is further limited to specific long-distance
 views from exposed portions of adjoining (mostly undeveloped), privately-owned property
 such as east-facing views from Carmel Guest Farm units located along the highest
 ridgelines overlooking Victoria Bay. Notwithstanding it is considered appropriate that future
 development of Kraaibosch 195/64 incorporates design measures aimed at reducing its
 overall visual impact;
- Architectural design should avoid bulky structures/ large potentially reflective surfaces and rather make provision for fragmentation of built form following natural slopes and contours;
- Finishing of structures should be aimed at avoiding reflective surfaces into the valley and make use of non-reflective, earth-related colour schemes and surfacing textures where possible:
- The urban design and architectural components should include characteristic regional settings and features (vernacular architecture) – both in terms of exterior and interior elements and features;

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Architectural design and aspects such as height, massing and orientation of future buildings
must therefore relate to typical local farm vernacular. This also relates to use of materials,
textures applied to exterior walls, perimeter fencing and visual screening;

- An architectural design manual for the proposed development, taking cognisance of the recommendations made in this report must be compiled and implemented;
- Both indoor and outdoor lighting to be provided for the proposed development must be installed in accordance with a scheme aimed at minimising the overall nocturnal footprint of the development within the rural landscape. The scheme should e.g. include the installation of subdued and downward orientated outdoor lighting fitted low so as to reduce lighting overspill. The possibility of using solar panels may be investigated

10.4 Archaeology

- Archaeological inspection should be undertaken by a professional archaeologist after vegetation clearing associated with the development in order to determine whether or not any cultural remains or burials are associated with the ruins and existing structure;
- A Palaeontological Impact Assessment (Desktop Study) should be conducted to determine
 whether the shale deposits are potentially fossil bearing.
- In the event that vegetation clearing and earthmoving activities expose archaeological materials, such activities must stop and Heritage Western Cape must be notified immediately;
- If archaeological materials are exposed during vegetation clearing and/or earth moving activities, then they must be dealt with in accordance with the National Heritage Resources Act (No. 25 of 1999) and at the expense of the developer;
- In the event of exposing human remains during construction, the matter will fall into the domain of Heritage Western Cape (Ms. Jenna Lavin) or the South African Heritage Resources Agency (Ms Colette Scheermeyer) and will require a professional archaeologist to undertake mitigation if needed.

11. PUBLIC PARTICIPATION

The Public Participation Process (PPP) for this HIA was coordinated with that of the EIA Process facilitated by *Sharples Environmental Services* in terms of the National Environmental Management Act, 1998 (Act 107 of 1998). *Perception Heritage Planning* furthermore engaged with the I&AP's listed below, each of whom were provided with a digital copy of the Draft Phase One HIA via registered mail to solicit *heritage-related comments* regarding the proposal. This commenting period stretched over a period of 30 calendar days from date of registration (proof of PPP attached as part of Annexure 11). *However, no comments were submitted to us during the public participation phase*:

George Heritage Trust

PO Box 564

GEORGE

6530

E: heno@dezignhouse.net

Attention: Heno Bosman (Chairman)

Seabreeze Cabanas

PO Box 111

GEORGE

6530

Scripture Union of South Africa

PO Box 291

RONDEBOSCH

7701

• Kraaibosch Ratepayers Association

PO Box 5080

GEORGE EAST

6539



12. ASSESSMENT OF IMPACTS

This Section serves to assess conformity of the Preferred Alternative (*Refer Section 6.2, Annexure 5.2*) to the key heritage design informants and indicators identified in Section 10 above. Where possible, each indicator is assessed individually for ease of reference.

12.1 Indicator relating to Built environment issues

a.) INDICATOR BE-1: Consider whether further archaeological investigations aimed at interrogating the possible age of the historic ruins/ foundations are desirable.

Assessment:

While HWC may require further historical archaeological input of the historic ruin, we do not consider that additional archaeological exploration is likely to significantly expand our current understanding of the overall cultural significance of this heritage resource. We do however agree that archaeological monitoring be implemented with the commencement of earthworks and that this shall include any earthworks within the proximity of the historic ruins. (Also see Indicator AIA-1, Section 12.4)

That archaeological monitoring for future earthworks be done by an experienced, suitably qualified archaeologist (Condition of approval – refer Section 12.4).

12.2 Indicators relating to Landscape issues

a.) INDICATOR LA-1: The site layout should make provision for adequate setback from natural drainage lines and make sufficient provision for accommodation and management of natural run-off.

Assessment:

Historic occupation of the property seems to have taken cognisance of natural drainage patterns through the property as well as natural run-off following high precipitation in the area. According to site layout plans for the Preferred Alternative provided to us proposed units would be set back from the 1:50 year flood line. Future vehicular access on the property would be along the existing servitude/tracks. To reduce the overall footprint of the access road (and potential for resultant increased run-off), access would be via two concrete tracks with passing bays at strategic points only, which are considered acceptable.

The Preferred Alternative would be set back from the 1:50 year flood line thus being appreciative of the local historic settlement pattern adopted here (No impact).

b.) INDICATOR LA-2: The three interconnected shallow coves offer a unique sense of place to the property, which should be appreciated within a site layout. An attempt should be made to cluster structures within these shallow coves in such a manner so as not to visually dominate these spaces.

Assessment:

The site layout for the proposed Preferred Alternative makes provision for clustering of twelve Resort zone II (max. 250m²) alienable units in the "central" cove and eight smaller Resort zone I (max. 120m²) rentable units in the westernmost cove. We note however that this alternative makes provision for a "Resort Clubhouse and Parking" at the easternmost entrance onto the property as well as a "Future Resort Clubhouse" – to be situated within the eastern cove, directly adjacent to the proposed Resort zone I units. In siting said Clubhouse at the eastern entrance to the property, this building is likely to be viewed within the context of the high density units within the Seabreeze development. The same would however apply to the proposed "Future Clubhouse", which is likely to be viewed within the context of urban fabric to form part of the eight Resort zone I units. While either location for the proposed Clubhouse would therefore be acceptable, it is recommended that the final site layout be amended to make provision for one Resort Clubhouse only.

That the final site layout be amended to make provision for one Resort Clubhouse at either one of the two sites indicated with the Preferred Alternative site layout (Condition of approval).

c.) INDICATOR LA-3: Buildings should not visually dominate the natural sense of place of the three coves. This should also be expressed in the architectural design as limiting structures to single-storey split-level height and in favour of split-level floor plan layout.

Assessment:

The Resort zone I cluster is sited within the smaller cove located at the end of the access road/ along eastern property boundary, which is more visually isolated and may offer more privacy/ exclusivity in

comparison to the Resort zone II cluster, to be sited within the adjoining, larger cove. Given restricted space within the smaller cove, it is considered reasonable that these units be accommodated within two-storey structures at this location – subject to an architectural design manual

The Resort zone II cluster would be sited within the slightly larger cove within which the natural gradient is better suited to single-storey, split level layout of proposed units so as to (a) reduce the overall visual massing of buildings here and (b) to mitigate the proposed units from visually dominating the natural cove itself. We note the conceptual architectural proposals put forward as part of the proposed Preferred Alternative and recommend that architectural design proposals for the two building clusters as well as Resort Clubhouse be further developed as part of an Architectural Design Manual, which shall be subject to further requirements as may be deemed necessary by DEADP.

That the Resort zone I cluster be restricted to two-storeys, Resort zone II cluster to singlestorey, split-level and Resort Clubhouse to single storey, subject to further requirements that may be deemed necessary by DEADP (Condition of approval).

d.) INDICATOR LA-4: Future development should avoid slopes steeper than 1:4 as these areas (mapped in Figure 9) are predominant overgrown by indigenous vegetation in this case, which significantly contributes to the overall setting of the place.

Assessment:

According to information submitted to us the Preferred Alternative would avoid slopes with a gradient steeper than 1:4.

It is considered that the Preferred Alternative suitably addresses this requirement.

12.3 Indicators relating to Visual-spatial issues

a.) INDICATOR VS-1: Future development of the property must incorporate design measures aimed at minimising its potential overall visual impact.

Assessment:

Given its location within a narrow, largely isolated valley, the overall visual impact of the proposed development is considered low. Any potential views are limited to specific long-distance views from exposed portions of adjoining (mostly undeveloped), privately-owned property such as east-facing views from certain Carmel Guest Farm units, located along the highest ridgelines overlooking Victoria Bay. It is considered appropriate that an Architectural Design Manual be developed, approved and implemented for the proposed development as set out in the condition below.

That an Architectural Design Manual be compiled for the proposed development, incorporating the following principles:

- Height restrictions recommended with Indicator LA-3;
- Architectural design should avoid bulky structures/ large potentially reflective surfaces and rather make provision for fragmentation of built form following natural slopes and contours:
- Finishing of structures should be aimed at avoiding reflective surfaces into the valley and make use of non-reflective, earth-related colour schemes and surfacing textures where possible;
- The urban design and architectural components should include characteristic regional settings and features (vernacular architecture) – both in terms of exterior and interior elements and features;
- Architectural design and aspects such as height, massing and orientation of future buildings must therefore relate to typical local farm vernacular. This also relates to use of materials, textures applied to exterior walls, perimeter fencing and visual screening;
- Both indoor and outdoor lighting to be provided for the proposed development must be
 installed in accordance with a scheme aimed at minimising the overall nocturnal footprint
 of the development within the rural landscape. The scheme should e.g. include the
 installation of subdued and downward orientated outdoor lighting fitted low so as to reduce
 lighting overspill. The possibility of using solar panels may be investigated.

12.4 Indicators relating to Archaeology

a.) INDICATOR AIA-1: Archaeological inspection should be undertaken by a professional archaeologist after vegetation clearing associated with the development in order to determine whether or not any cultural remains or burials are associated with the ruins and existing structure.

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Assessment:

Due to the current overgrown state of the property and resultant restricted archaeological visibility the requirement for archaeological monitoring of future earthworks associated with the proposed development is considered reasonable as safeguard in (a) identifying any possible cultural remains or burials and (b) unearthing features within proximity of the historic ruin that may provide insight into the date of construction of this structure (now ruined) so as to clarify and better define its cultural significance.

Earthworks associated with the proposed development must be monitored by a suitably qualified archaeologist so as to avoid/ minimise any potential negative impacts on subterranean archaeological resources and reporting of such monitoring must be submitted to Heritage Western Cape by said archaeologist (Condition of approval).

The following further recommendations transposed from the AIA should also be adhered to (Conditions of approval):

- In the event that vegetation clearing and earthmoving activities expose archaeological materials, such activities must stop and Heritage Western Cape must be notified immediately;
- If archaeological materials are exposed during vegetation clearing and/or earth moving activities, then they must be dealt with in accordance with the National Heritage Resources Act (No. 25 of 1999) and at the expense of the developer:
- In the event of exposing human remains during construction, the matter will fall into the domain of Heritage Western Cape (Ms. Jenna Lavin) or the South African Heritage Resources Agency (Ms Colette Scheermeyer) and will require a professional archaeologist to undertake mitigation if needed.

b.) INDICATOR AIA-2: A Palaeontological Impact Assessment (Desktop Study) should be conducted to determine whether the shale deposits are potentially fossil bearing.

Assessment:

The above recommendation and copy of the Archaeological Impact Assessment was forwarded to a suitably-qualified palaeontologist (Dr. John Almond) via e-mail, who subsequently advised (via e-mail dated 29th February 2012) as follows:

"Any "shales" in the Victoria Bay area would probably be cleaved slates of the Late Precambrian Kaaimans Group and too metamorphosed to yield substantial fossils, only microfossils at most. In my view, a PIA is therefore not necessary for this project".

Having regard to the above it is therefore recommended that no further palaeontological studies are required in this instance (No impact).

12.5 Summary of Recommendations/ Conditions of approval

For ease of reference the following table represents a summary of conditions listed in Sections 12.1 to 12.4 above.

Indicator Ref	Recommended HWC Conditions of Approval
LA-2	That the final site layout be amended to make provision for one Resort Clubhouse
	at either one of the two sites indicated with the Preferred Alternative site layout.
LA-3	That the Resort zone I cluster be restricted to two-storeys, Resort zone II cluster to
	single-storey, split-level and Resort Clubhouse to single storey, subject to further
	requirements that may be deemed necessary by DEADP.
VS-1	That an Architectural Design Manual be compiled for the proposed development,
	incorporating the following principles:
	Height restrictions recommended with Indicator LA-3:
	 Architectural design should avoid bulky structures/ large potentially reflective
	surfaces and rather make provision for fragmentation of built form following
	natural slopes and contours:
	 Finishing of structures should be aimed at avoiding reflective surfaces into the
	valley and make use of non-reflective, earth-related colour schemes and
	surfacing textures where possible:
	 The urban design and architectural components should include characteristic
	regional settings and features (vernacular architecture) – both in terms of exterior
	and interior elements and features;
	 Architectural design and aspects such as height, massing and orientation of
	future buildings must therefore relate to typical local farm vernacular. This also

	relates to use of materials, textures applied to exterior walls, perimeter fencing and visual screening; Both indoor and outdoor lighting to be provided for the proposed development must be installed in accordance with a scheme aimed at minimising the overall nocturnal footprint of the development within the rural landscape. The scheme should e.g. include the installation of subdued and downward orientated outdoor lighting fitted low so as to reduce lighting overspill. The possibility of using solar panels may be investigated.
AIA-1	 Earthworks associated with the proposed development must be monitored by a suitably qualified archaeologist so as to avoid/ minimise any potential negative impacts on subterranean archaeological resources and reporting of such monitoring must be submitted to Heritage Western Cape by said archaeologist; In the event that vegetation clearing and earthmoving activities expose archaeological materials, such activities must stop and Heritage Western Cape must be notified immediately; If archaeological materials are exposed during vegetation clearing and/or earth moving activities, then they must be dealt with in accordance with the National Heritage Resources Act (No. 25 of 1999) and at the expense of the developer; In the event of exposing human remains during construction, the matter will fall into the domain of Heritage Western Cape (Ms. Jenna Lavin) or the South African Heritage Resources Agency (Ms Colette Scheermeyer) and will require a professional archaeologist to undertake mitigation if needed.

13. **RECOMMENDATIONS**

Having regard to the above assessment, it is recommended that:

- 13.1 This report fulfils the requirements of an Integrated Heritage Impact Assessment;
- The detailed recommendations and requirements as set out in Section 12.1 to 12.5 13.2 of this Integrated Heritage Impact Assessment be adhered to.

PERCEPTION Heritage Planning 18th April 2012

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