

**A LETTER OF RECOMMENDATION (WITH CONDITIONS) FOR THE EXEMPTION OF A FULL PHASE 1 ARCHAEOLOGICAL HERITAGE IMPACT ASSESSMENT FOR A PROPOSED BUSINESS (1) DEVELOPMENT ON ERF 7005 PORTION OF ERF 1935 IN WALMER, GQEBERHA (PORT ELIZABETH), NELSON MANDELA BAY MUNICIPALITY, EASTERN CAPE PROVINCE**



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## **PROJECT INFORMATION**

Eastern Cape Heritage Consultants cc has been appointed by Digital Soils Africa (Pty) Ltd to conduct a Phase 1 Archaeological Heritage Impact Assessment (AIA) for the a proposed Business (1) development on Erf 7005 Portion of Erf 1935 in Walmer, Gqeberha (Port Elizabeth), Nelson Mandela Bay Municipality, Eastern Cape Province.

The applicant proposes the development of 19.5 Ha of Erf 7005 Portion of Erf 1935, formally known as the Walmer Country Club, with the necessary infrastructure such as roads, sewage lines, and stormwater drainage in accordance to engineering and local Municipality guidelines, to allow for subdivision of the area.

Currently, Erf 7005, measuring about 114, 9168 Ha in extent, is zoned for Special Purposes 316 and an application at the Nelson Mandela Bay Municipality is underway for subdivision and rezoning of first, the proposed Portion 1 (measuring 19.5 Ha) to Business 1 purposes, and then secondly, the subsequent subdivision of Portion 1 into 78 portions.

The 78 portions of properties will range in size from 1 463m<sup>2</sup> to 5 189m<sup>2</sup> to be developed for mixed-use purposes such as warehousing, storage, shops, residential units etc, as is allowed under Business 1 purposes rezoning. Each land portion is likely to have a floor area of about 50% of the portion size of the plot to accommodate the necessary parking, loading and vehicle circulation requirements.

### **Applicant**

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### **Consultant**

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### **Purpose of the study**

The purpose of the study was to conduct a Phase 1 Archaeological Impact Assessment (AIA) for the proposed project and the associated activities, to describe and evaluate:

- the importance of possible archaeological sites, features and materials,
- the potential impact of the development on these resources and,
- to propose recommendations to minimize possible damage to these resources.

### **Site and Location**

The property is located within the 1:50 000 topographic reference map 3325DC & DD and 3425 Port Elizabeth (Map 1). The proposed development area is on the northwestern portion of the former Walmer Country Club golf course and to the south of a non-functioning railway track (previously known as the Apple Express railway) and bordered by the residential suburbs of

Greenshields Park to the north, across Buffelsfontein Road (MR422), Walmer Heights to the south and west, as well as the Walmer Link housing development to the east. (Map 2). The proposed activities will take place on a relatively flat, sandy area that is covered with dense grass, and a mixture of alien trees and shrubs. There are a couple of dilapidated structures on the property such as cement dams and a vandalized pump house. Certain areas appear to have been disturbed in the past and there are several footpaths and other open areas within the dense vegetation. (Fig. 1). General GPS reading: 33 59.843S, 25 32.387E.

## **Relevant Archaeological Impact Assessments**

- Binneman, J. 2008. A phase 1 archaeological heritage impact assessment for the proposed residential development on the Remainder of Erf 1226, Fairview, Port Elizabeth, Nelson Mandela Bay Municipality, Eastern Cape. Prepared for CEN Integrated Environmental Management Unit. Port Elizabeth. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Binneman, J. and Reichert, K. 2020. A phase 1 archaeological heritage impact assessment for the proposed development of Erf 11667 for business purposes in Walmer, Port Elizabeth, Nelson Mandela Bay Municipality of the Eastern Cape Province. Prepared for Engineering Advice & Services (Pty) Ltd. Humewood. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Binneman, J. and Reichert, K. 2019. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological impact assessment for the proposed residential development (River Oaks) on Erf 738, in Fairview, Port Elizabeth, Nelson Mandela Bay Municipality of the Eastern Cape Province. Prepared for CEN Integrated Environmental Management Unit. Port Elizabeth. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Binneman, J. and Reichert, K. 2017. A letter of recommendation (with conditions) for the exemption of a full phase 1 Archaeological Impact Assessment for the proposed St. Christopher's Walmer Private School Development on Erf 14680 in Walmer, Port Elizabeth, Eastern Cape Province. EOH Coastal and Environmental Services. Grahamstown. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Booth, C. 2014. A phase 1 archaeological impact assessment for the proposed Walmer Gqebera low-cost housing development on Erf 11305, Walmer, Port Elizabeth, Nelson Mandela Bay Municipality (NMBM), Eastern Cape Province. Prepared for: SRK Consulting. Port Elizabeth. Booth Heritage Consulting. Grahamstown.
- Booth, C. 2013. A phase 1 archaeological impact assessment (AIA) for the Airports Company of South Africa (ACSA) proposed Port Elizabeth Airport stormwater upgrade, Walmer, Nelson Mandela Bay Municipality, Eastern Cape Province. Prepared for: SRK Consulting. Albany Museum. Grahamstown.
- Reichert, K. 2022. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological heritage impact assessment for the proposed mixed residential development and associated infrastructure on Erven 256 - 259, Fairview, Nelson Mandela Bay Municipality, Eastern Cape Province. Prepared for JG Afrika (Pty) Ltd. Greenacres. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Van Ryneveld, K. 2013. Phase 1 archaeological impact assessment: Walmer stormwater detention ponds and associated infrastructure, Erven 1935 and 7006, Walmer, Nelson Mandela Bay Municipality, Eastern Cape Province. Prepared for BKS - Environmental Management Department. Port Elizabeth. ArchaeoMaps Archaeological Consultancy. Beacon Bay.

## **ARCHAEOLOGICAL INVESTIGATION**

### **Methodology and results**

Google aerial images as well as previous heritage reports related to the study area were studied prior to the investigation. The investigation was conducted on foot by an archaeologist. GPS readings

were taken with a Garmin and all important features were digitally recorded. The archaeological visibility was poor due to the dense grass, trees and other vegetation, but the visibility was better where areas have been exposed in footpaths and as a result of other surface disturbances. Molehills were also checked on the existing golf course adjacent to the proposed development area for the presence of possible subsurface archaeological material. No archaeological sites/materials were observed within or in close proximity to the study area. In general, the area for the proposed development appears to be of low archaeological sensitivity and it is unlikely that any archaeological remains of any significance will be found *in situ* or exposed during these activities. There are no known graves or historical buildings on the proposed site. There are a couple of dilapidated structures such as dams and a vandalized pump house on the property that are not older than 60 years.



**Figure 1. General views of some of the structures located within the proposed development area on on Erf 7005 Portion of Erf 1935 in Walmer, Gqeberha (Port Elizabeth), Nelson Mandela Bay Municipality, Eastern Cape Province.**



**Figure 2. General views of the proposed area for the development on Erf 7005 Portion of Erf 1935 in Walmer, Gqeberha, Nelson Mandela Bay Municipality, Eastern Cape Province.**

## DISCUSSION AND CONDITIONS

No archaeological sites/materials were observed during the investigation of the proposed study area. Although it is unlikely that archaeological remains will be found *in situ*, there is always a possibility that human remains and/or other archaeological and historical material may be uncovered during the development. Several other archaeological assessments have been conducted in close proximity to the proposed development area (Binneman & Reichert 2017; Booth 2014) and one of the stormwater detention ponds that formed part of another assessment was located within the proposed development area (Van Ryneveld 2013). The 2013 survey produced similar results to the current study and no archaeological sites / material were observed at the proposed location of the stormwater detention pond on the property.

The main impact on possible archaeological sites/remains will be the physical disturbance of the material and its context. Should such material be exposed then work must cease in the immediate area and it must be reported to the archaeologist at the Albany Museum in Makhanda (Grahamstown) (Tel: 046 622 2312) or to the Eastern Cape Provincial Heritage Resources Authority (Tel.: 043 745 0888), so that a systematic and professional investigation can be undertaken. Sufficient time should be allowed to remove/collect such material (See Appendix B for a list of possible archaeological sites that maybe found in the area). The developer must finance the costs should additional investigations be required.

## REFERENCES

- Binneman, J. and Reichert, K. 2017. A letter of recommendation (with conditions) for the exemption of a full phase 1 Archaeological Impact Assessment for the proposed St. Christopher's Walmer Private School Development on Erf 14680 in Walmer, Port Elizabeth, Eastern Cape Province. EOH Coastal and Environmental Services. Grahamstown. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Booth, C. 2014. A phase 1 archaeological impact assessment for the proposed Walmer Gqebera low-cost housing development on Erf 11305, Walmer, Port Elizabeth, Nelson Mandela Bay Municipality (NMBM), Eastern Cape Province. Prepared for: SRK Consulting. Port Elizabeth. Booth Heritage Consulting. Grahamstown.
- Van Ryneveld, K. 2013. Phase 1 archaeological impact assessment: Walmer stormwater detention ponds and associated infrastructure, Erven 1935 and 7006, Walmer, Nelson Mandela Bay Municipality, Eastern Cape Province. Prepared for BKS - Environmental Management Department. Port Elizabeth. ArchaeoMaps Archaeological Consultancy. Beacon Bay.

## LETTER OF RECOMMENDATION

It is recommended that the proposed Business (1) development on Erf 7005 Portion of Erf 1935 in Walmer, Nelson Mandela Bay, Eastern Cape Province, is exempted from a full Phase 1 Archaeological Heritage Impact Assessment. The proposed development area appears to be of low archaeological sensitivity, and it is therefore unlikely that any significant archaeological remains will be found on the property. The proposed development may proceed as planned.

Note: This letter of recommendation only exempts the proposed development from a full Phase 1 Archaeological Heritage Impact Assessment, but not for other heritage impact assessments. It must also be clear that this letter will be assessed by the relevant heritage resources authority. The final decision rests with the heritage resources authority, which should give a permit or a formal letter of permission for the destruction of any cultural sites.

Section 35 of the National Heritage Resources Act, No. 25 of 1999 (see Appendix A) requires a full Heritage Impact Assessment (HIA) in order that all heritage resources, that is, all places or

objects of aesthetics, architectural, historic, scientific, social, spiritual linguistic or technological value or significance are protected. Thus, any assessment should make provision for the protection of all these heritage components, including archaeology, shipwrecks, battlefields, graves, and structures older than 60 years, living heritage, historical settlements, landscapes, geological sites, palaeontological sites and objects.

## **GENERAL REMARKS AND CONDITIONS**

It must be emphasized that this letter of recommendation for the exemption of a full Phase 1 archaeological heritage impact assessment is based on the visibility of archaeological sites/material and may not therefore, reflect the true state of affairs. Sites and material may be covered by soil and vegetation and will only be located once this has been removed. In the unlikely event of such finds being uncovered, (during any phase of construction work), it must be reported to the archaeologist at the Albany Museum in Makhanda (Grahamstown) (Tel: 046 622 2312) or to the Eastern Cape Provincial Heritage Resources Authority (Tel.: 043 745 0888) immediately. The consultant is responsible to forward this report to the relevant Heritage Authority for assessment, unless alternative arrangements have been made with the specialist to submit the report.

## **APPENDIX A: brief legislative requirements**

Parts of sections 34, 35(4), 36(3) and 38(1) (8) of the National Heritage Resources Act, No. 25 of 1999 apply:

### ***Structures***

*34 (1) No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.*

### ***Archaeology, palaeontology and meteorites***

*35 (4) No person may, without a permit issued by the responsible heritage resources authority—*

- (a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;*
- (b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;*
- (d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.*

### ***Burial grounds and graves***

*36. (3) (a) No person may, without a permit issued by SAHRA or a provincial heritage resources authority—*

- (a) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;*
- (b) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or*
- (c) bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.*

***Heritage resources management***

38. (1) *Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorized as –*

- (a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;*
- (b) the construction of a bridge or similar structure exceeding 50m in length;*
- (c) any development or other activity which will change the character of the site –*
  - (i) exceeding 5000m<sup>2</sup> in extent, or*
  - (ii) involving three or more erven or subdivisions thereof; or*
  - (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or*
  - (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA, or a provincial resources authority;*
- (d) the re-zoning of a site exceeding 10 000m<sup>2</sup> in extent; or*
- (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must as the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.*



## **APPENDIX B: IDENTIFICATION OF ARCHAEOLOGICAL FEATURES AND MATERIAL FROM INLAND AREAS: guidelines and procedures for developers**

### **Human Skeletal material**

Human remains, whether the complete remains of an individual buried during the past, or scattered human remains resulting from disturbance of the grave, should be reported. In general, the remains are buried in a flexed position on their sides but are also found buried in a sitting position with a flat stone capping and developers are requested to be on the alert for this.

### **Freshwater mussel middens**

Freshwater mussels are found in the muddy banks of rivers and streams and were collected by people in the past as a food resource. Freshwater mussel shell middens are accumulations of mussel shell and are usually found close to rivers and streams. These shell middens frequently contain stone tools, pottery, bone, and occasionally human remains. Shell middens may be of various sizes and depths, but an accumulation which exceeds 1 m<sup>2</sup> in extent, should be reported to an archaeologist.

### **Fossil bone**

Fossil bones or any other concentrations of bones, whether fossilized or not, should be reported.

### **Stone artefacts**

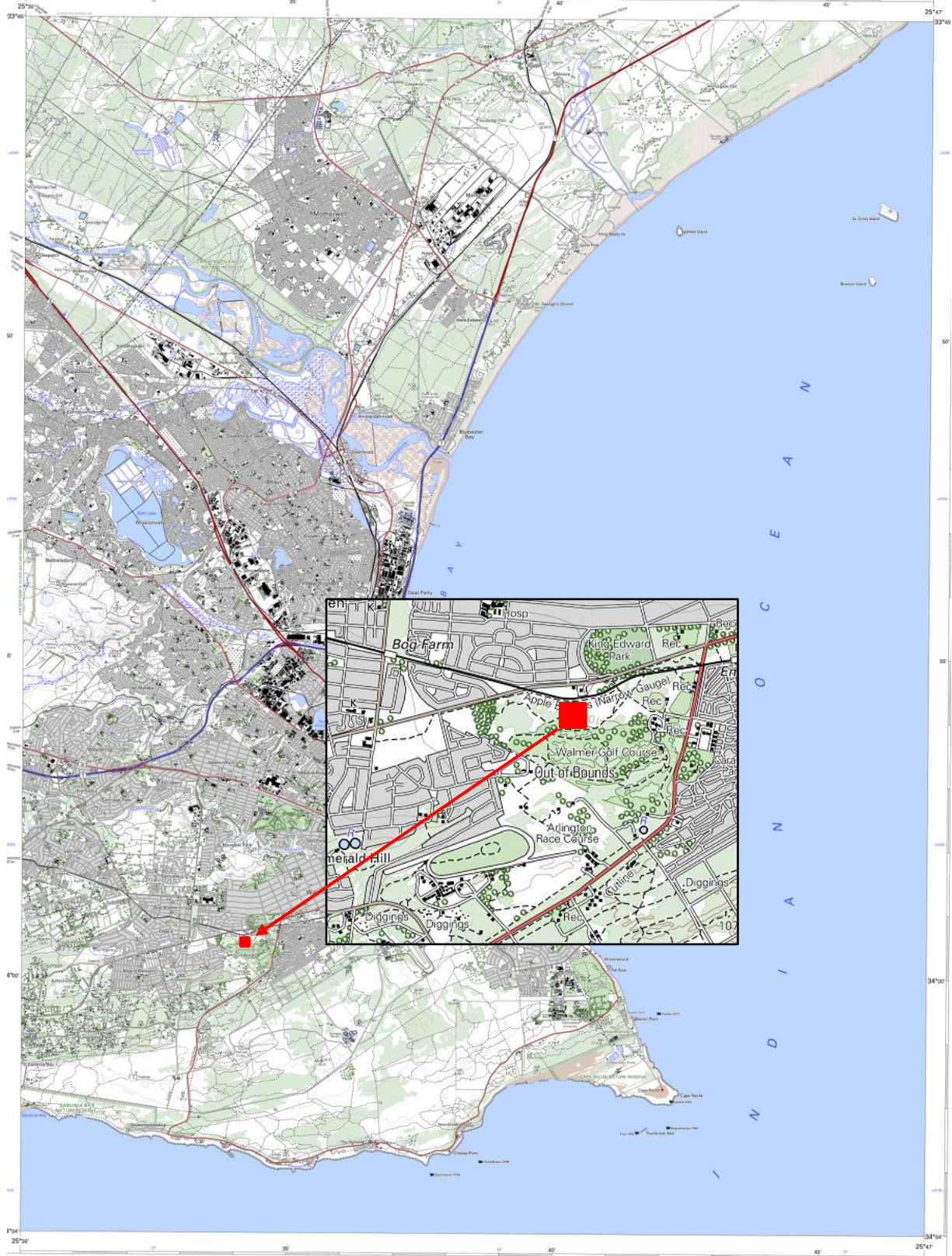
These are difficult for the layman to identify. However, large accumulations of flaked stones which do not appear to have been distributed naturally should be reported. If the stone tools are associated with bone remains, development should be halted immediately, and archaeologists notified.

### **Stone features and platforms**

These occur in different forms and sizes, but easily identifiable. The most common are an accumulation of roughly circular fire cracked stones tightly spaced and filled in with charcoal and marine shell. They are usually 1-2 metres in diameter and may represent cooking platforms for shellfish. Others may resemble circular single row cobble stone markers. These occur in different sizes and may be the remains of wind breaks or cooking shelters.

### **Historical artefacts or features**

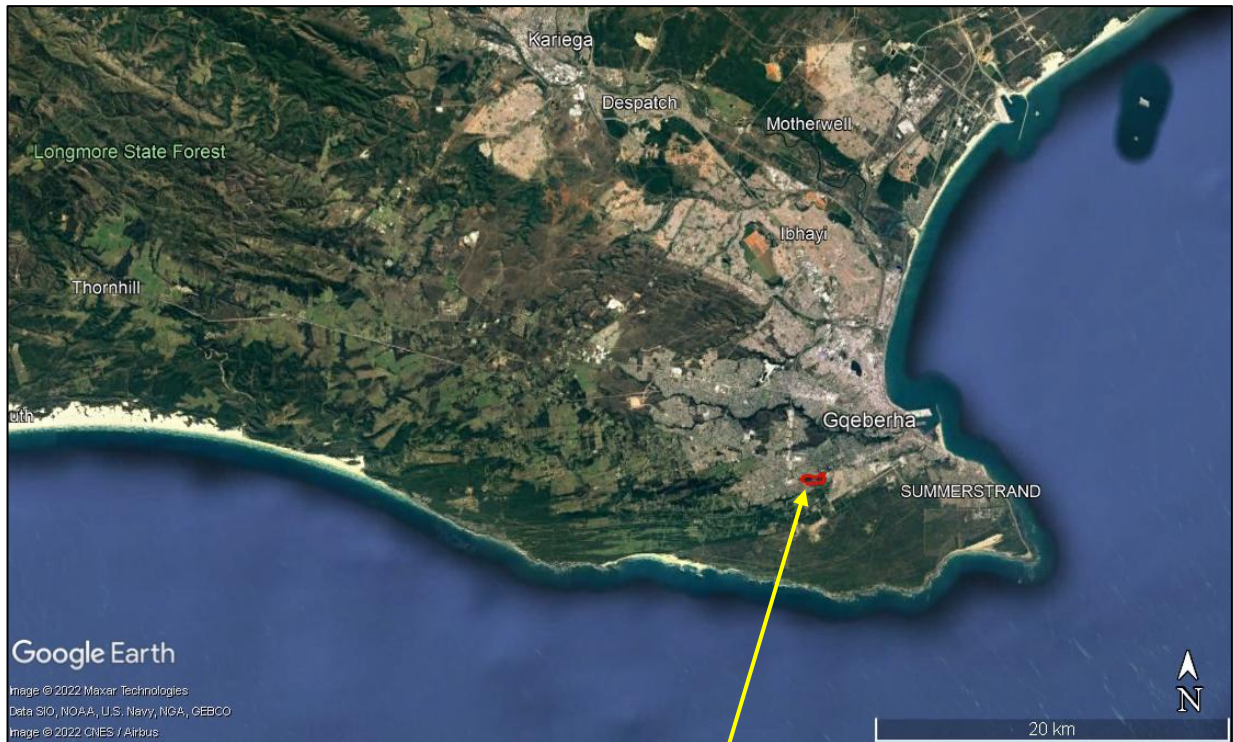
These are easy to identify and include foundations of buildings or other construction features and items from domestic and military activities.



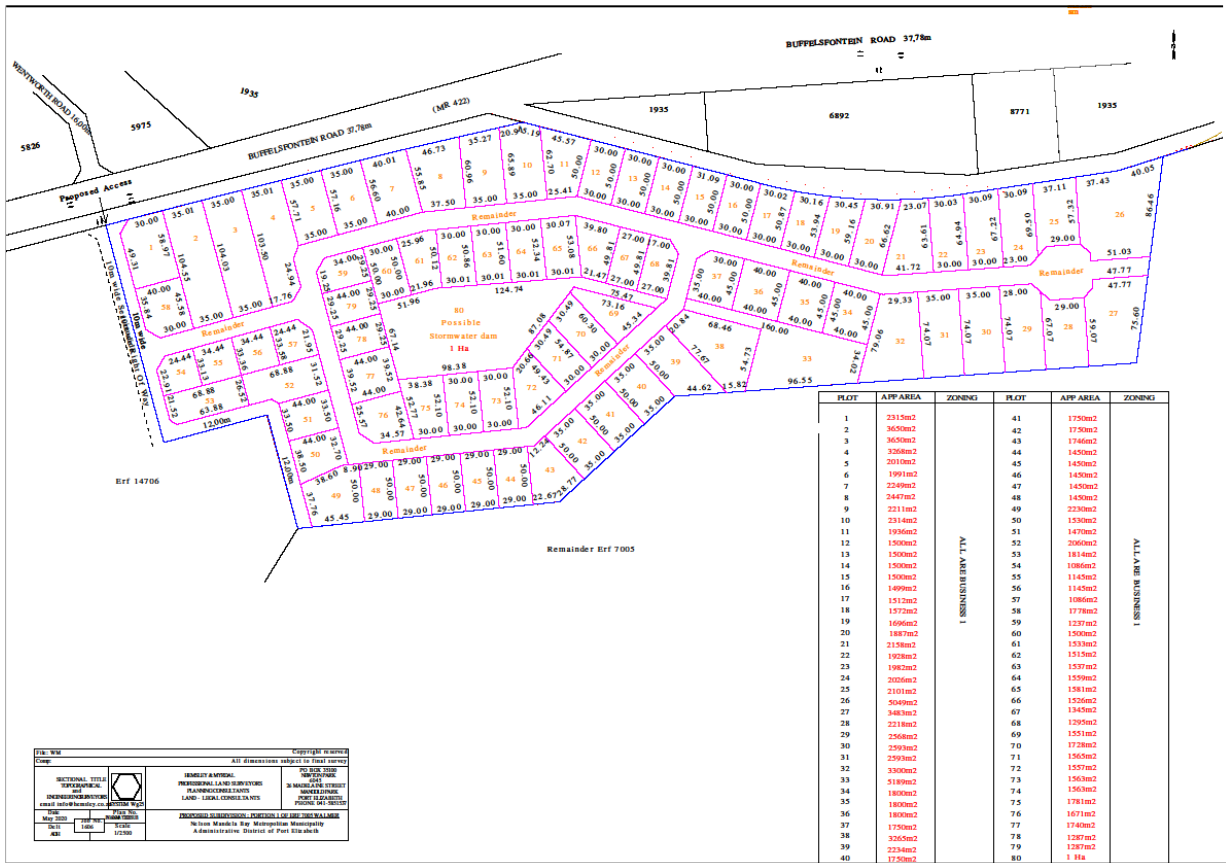
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**Map 1. 1:50 000 Topographic maps indicating the approximate location of the proposed area for the development on Erf 7005 Portion of Erf 1935 in Walmer, Gqeberha (Port Elizabeth), Nelson Mandela Bay Municipality, Eastern Cape Province (marked by the red squares).**



**Map 2. Aerial views of the general location of the proposed area for the development of Erf 7005 Portion of Erf 1935 in Walmer, Gqeberha (Port Elizabeth), Eastern Cape Province, indicated with the yellow arrow. The proposed development area is outlined in red.**



Map 3. Provisional layout of the proposed Business (1) development on Erf 7005 Portion of Erf 1935 (Map courtesy of Hemsley & Myrdal Professional Land Surveyors).