

Heritage Impact Assessment

**Portion of Remainder of Farm 948, Kommetjie
(Protea Ridge, Kommetjie)**

submitted in terms of section 38(8) of the National Heritage
Resources Act, 1999 (Act 25 of 1999)

Submitted by:



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EXECUTIVE SUMMARY

This heritage impact assessment for the proposed development of a portion of the Remainder of Farm 948, Kommetjie is submitted in terms of *Section 38(8)* of the National Heritage Resources Act (Act 25 of 1999) (NHRA) as it is undertaken as part of a Basic Assessment process being carried out in terms of the National Environmental Management Act, 1998 (Act 107 of 1998), as amended, and the Environmental Impact Assessment Regulations, 2006.

The site is located in the urban area of Kommetjie; between the Klein Slangkop residential estate to its north and the Riverside residential area to its south. To its east it borders on the Table Mountain National Park and to its west the Imhoff's Gift Caravan Park and the Naval Radar/Radio Station site. The western arm of the site is wedged between these properties.

The site originally formed part of the farms Imhoff's Gift and De Goede Hoop that were granted to settlers in the 1700's. In 1904 it became part of a consolidated farm that belonged to the Kommetjie Estates, which has been developed extensively over time, to establish the settlement of Kommetjie. Development of the site is supported by the recently approved Cape Town Spatial Development Framework, which indicates the site for infill urban development.

The intrinsic heritage value of the site is limited to the valuable indigenous plant species on the site and the rocky outcrops on the site. The archaeological impact assessment found no resources of significance on the site. The site does have some contextual value in that it borders on the Table Mountain National Park (TMNP) to its east (but visually largely shielded by the Protea Ridge) and the Naval Radar/Radio Station site to its south and west. The TMNP is a grade 1 heritage resource and the Noordhoek fore dune and Wildevoël Vlei has been indicated as a heritage precinct in the Conservation Development Framework of the TMNP, but officials at the TMNP could not locate any records of the heritage resources related to the precinct (it is presumed to be archaeological). The Naval Radar/Radio Station site dates to the late 1930s and possibly has historical, social and technological heritage value. There are also 4 houses dating to the establishment of the site and situated with their backs to the eastern boundary of the property. These houses are not regarded as exceptional examples of their period or style and due to their setting do not contribute to a townscape of significance. No record of a grading for the Naval site could be found. The site in question in this report is regarded as ungradeable, due to its limited intrinsic and contextual resources.

Three development options were put forward for assessment. All three entail residential development with associated uses. Alternative 1 entails development that covered the whole of the site and included 102 erven. Alternative 2 entails a somewhat reduced development footprint, whilst Alternative 3, largely in response to botanical issues, entails a significantly reduced footprint, which also considers issues of visual impact from the TMNP.

Potential impacts on heritage resources identified are the visual impacts on the TMNP, the Naval Radar/Radio Station site and impacts on valuable botanical resources and the rock outcrops on the site. The proposed development will not impact the potential intrinsic heritage resources related to the Naval Radar/Radio Station site (in this regard it is noted that suburban development comes right up to the boundary of the Naval site to its south).

The negative impacts of Alternative 1 are regarded as highly significant from a heritage perspective, whilst the impacts of Alternative 2 are regarded as moderately significant. Alternative 3 which minimises the visual impact from the TMNP (development only potentially visible in the south and north eastern corner, which will be seen in the context of adjacent development) and on botanical resources is regarded as of low significance and acceptable from a heritage perspective provided that the mitigation measures set out in the visual impact assessment and botanical impact assessment are fully implemented.

Thus it is recommended that:

- This HIA be endorsed as having met the requirements of section 38 of the NHRA;
- The preferred development option be supported, subject to the mitigation measures set out in section 11.5 of this report.

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1.0 Introduction

This heritage impact assessment for the proposed development of a portion of the Remainder of Farm 948, Kommetjie, is submitted in terms of *Section 38(8)* of the National Heritage Resources Act (Act 25 of 1999) (NHRA) as it is undertaken as part of a Basic Assessment process being carried out in terms of the National Environmental Management Act, 1998 (Act 107 of 1998), as amended, and the Environmental Impact Assessment Regulations, 2010. This portion of the remainder of Farm 948, measures just more than 10 ha and is situated in the northern part of Kommetjie and borders on Klein Slangkop Estate, the Naval Radio station site, the Riverside residential area, the Imhoff's Gift Caravan Park and the Table Mountain National Park.

Following on the submission of a Notification of Intent to Develop, HWC requested a heritage impact assessment that addresses the impacts on archaeological resources as well as the visual impacts on the heritage resources of the Table Mountain National Park and the WWII Radar/Radio Station located next to the site. HWC also requested comment from SAHRA on the proposed development. The response from HWC is attached in Annexure A.

2.0 The site and its context

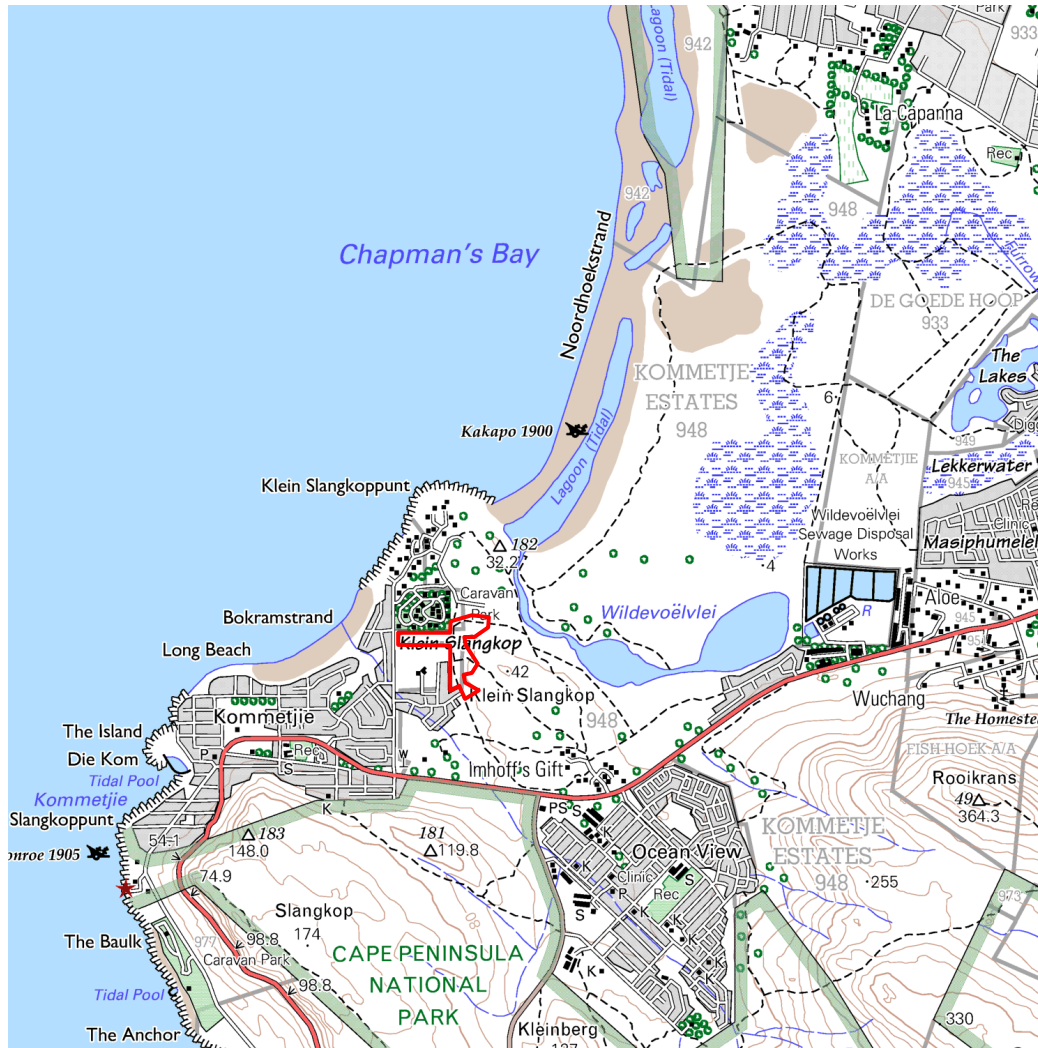


Figure 1: Extract from 1:50 000 map series indicating the location of the site (Chief Directorate Surveys and Mapping, 2000: 3418AB& AD Cape Peninsula)

The site, which measures 10,35ha, is located in the northern part of Kommetjie. The western section or arm of the site bordering on Wireless Road, is wedged between the Imhoff's Gift Caravan Park and the Naval Radar/Radio Station to its south. The eastern portion of the site is bounded by the Table Mountain National Park to its east, the relative recent residential developments of Klein Slangkop Residential Estate to its north and the Riverside residential area to its south. The site is currently vacant and some of the disturbed parts are covered with alien vegetation, whereas other parts, notably to the east of the site are covered in indigenous vegetation. The western arm of the site is sandy and flat, rising gently at a slope of approximately 1:70 towards the east with the slope increasing to 1:10–15 closer to the eastern boundary. The eastern boundary of the site runs below the Protea Ridge ridgeline situated between Wireless Road and the Wildevoël Vlei.



FIGURE 2: Google Earth Image



FIGURE 3: Oblique view from Google Earth



PHOTO 1: North-western section of the site. Photo taken from Klein Slangkop Estate looking south



PHOTO 2: Klein Slangkop Estate – housing close to site boundary



PHOTO 3: The western arm of the site, wedged between the caravan park and Naval Radar/Radio Station site. Photo taken from Wireless Road looking east.



PHOTO 4: The western arm of the site, with the Naval Radar Station site to the right. Note the Protea Ridge in back marking the eastern boundary of the site



PHOTO 5: Housing along Wireless Road opposite the site



PHOTO 6: Looking east along Wireless - note the Naval Radar Station fence



PHOTO 7: Looking onto the naval radar station site from the site itself (i.e. looking towards the south-west)



PHOTO 8: Looking north-west across the site from the end of Riverside Crescent (Google Street View).



PHOTO 9: Looking north-east from the end of Riverside Crescent across the site.



PHOTOs 10 & 11: Development along Riverside Crescent (with the southern end of the site visible at the end of the road)

3.0 Methodology

The methodology followed to prepare this report entailed the following:

- Site visits in order to identify heritage resources on the site and related to the site, including its context and visual sensitivity.
- A revision of relevant studies, available, (such as those listed in section 3.1 below) that may contribute to an understanding of the heritage resources on the site.
- A review of the relevant legislation that informs this study.
- Research at the local library, the Surveyor General and the Deeds Office, to gain an understanding of the history of the site.

3.1 Inputs

As noted above this assessment forms part of an Environmental Impact Assessment process being undertaken in terms of NEMA. Other specialist studies of relevance forming part of the Basic Assessment include:

3.1.1 Archaeological Impact Assessment: Proposed Residential Development on Protea Ridge (Farm 948), Kommetjie, Simonstown District, Cape Town Metro prepared by Lita Webley and Jayson Orton, Archaeology Contracts Office, August 2011

The Archaeological Impact Assessment found some scattered stone artefacts and marine shells, but these are not considered as significant archaeological resources and the authors recommended that the proposed development may proceed.

A copy of this report is attached in Annexure B.

3.1.2 Updated Botanical Baseline and Impact Assessment of Proposed Protea Ridge Development Site (Remainder of Farm 948 Kommetjie Estates), Kommetjie, Cape Peninsula prepared by Nick Helme, 14 November 2011

This study found that “approximately 40% of the site has been heavily disturbed and is regarded as being of Low regional conservation value, whilst most of the remainder is of High conservation value, with at least seven plant Species of Conservation Concern having been recorded in the natural areas on site. Five of these are found within the western arm of the site, and this part of the site is thus regarded as an important area in terms of plant and habitat conservation. Peninsula Sandstone Fynbos, Cape Flats Dune Strandveld and Hangklip Sand Fynbos are the three natural vegetation types present on site, with the latter two dominant. All three are regarded as threatened habitats (vegetation types) on a national basis, and additional impacts on any of these will thus have cumulative (regional) botanical impacts. Development should ideally thus be restricted to the Low conservation value parts of the site, in which case botanical impacts could be kept to an acceptable level, and positive ecological impacts maximised” (Helme, 2011).

The study concluded that the Alternative 3 is the preferred option from a botanical point of view with impacts rated as low negative. This option is also considered to be slightly more preferable than the no-go option as it has a number of important positive ecological attributes which help balance out its negative impacts. Mitigation measures put forward include precise demarcation of development footprints, control of heavy machinery during construction, maintenance of open spaces during the operational phase, the restriction on the planting of certain invasive plant species and planning for the burning of the fynbos.

A copy of this report is attached in Annexure C.

3.1.3 Visual Impact Assessment, Protea Ridge Housing Development, Cape Farm ‘The Kommetjie Estates’ No. 948, Kommetjie, Cape Town prepared by Albert van der Stok, October 2012

The VIA noted that Kommetjie has a very distinct ‘village’ sense of place surrounded by the natural areas of the coast and the TMNP and thus it is important for any new development to be sensitive to the visual environment and only be approved if the sense of place can be maintained with minimal disturbance. The VIA addressed visual impacts on Wireless Road, the Caravan Park, Klein Slangkop Estate, the Naval Radar/Radio Station Site, the Riverside residential area, the Table Mountain National Park (TMNP) and other areas. From a heritage perspective the impacts on the TMNP and Naval Radar Station site are regarded as particularly important.

The VIA concluded as follows:

- The overall significance of the visual impact has been assessed at medium-high for Alternative 1, medium for Alternative 2 and medium-low for Alternative 3.
- As the site is the last area to the east of Wireless Road that can still be developed, the visual impacts associated with the development will cap the potential changes to the local visual environment for the foreseeable future.
- The overall significance rating of Medium-low for Alternative 3 with full mitigation is considered acceptable for a development of this nature and extent, and therefore the specialist recommended that, purely in terms of visual issues, the implementation of Alternative 3 be allowed to proceed provided that the mitigation measures are implemented in full.

A copy of this report is attached in Annexure D.

4.0 Legal Context

4.1 National Heritage Resources Act (Act 25 of 1999)

Although this study forms part of a Basic Assessment process undertaken in terms of the National Environmental Management Act, the requirements of the National Heritage Resources Act (Act 25 of 1999) have to be met.

Section 38(1)(c)(i) of the NHRA requires the submission of a notification of intent to develop (NID) when the proposed development will change the character of a site exceeding 5 000 m² in extent and section 38(1)(d) requires a NID for a development that entails the rezoning of a site exceeding 10 000m². In terms of section 38(8) however, the provisions of section 38 do not apply to a development as described in subsection (1) if an evaluation of the impact of such development on heritage resources is required in terms of the relevant environmental legislation: *“Provided that the consenting authority must ensure that the evaluation fulfils the requirements of the relevant heritage resources authority in terms of subsection (3), and any comments and recommendations of the relevant heritage resources authority with regard to such development have been taken into account prior to the granting of the consent.”*

This report follows on the submission of a NID in relation to the site and the assessment is intended to ensure that the requirements of HWC in terms of section 38(3) of the NHRA are fulfilled. In response to the NID, HWC requested that the HIA address the impacts of the development on the archaeology on the site and visual impacts on the adjacent Table Mountain National Park and the Naval Radar Station site.

A copy of the response from HWC is attached in Annexure A.

The site does not fall within a registered conservation area in terms of section 31, and has not been awarded any protection in terms of section 27 of the NHRA, and there are no structures older than 60 years that will be affected by the proposed development. The archaeological impact assessment found no archaeological resources of significance on the site (Webley & Orton, 2011).

4.2 The National Environmental Management Act (Act 107 of 1998) (NEMA)

The National Environmental Management Act (Act No. 107 of 1998), as amended, (NEMA) makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the relevant authorities based on the findings of an environmental assessment. NEMA is a national act, which is enforced by the Department of Environmental Affairs (DEA). These powers are delegated in the Western Cape to the Department of Environmental Affairs and Development Planning (DEA&DP) (Doug Jeffrey Environmental Consultants, 2011). DEA&DP will consider the comments of HWC in response to the HIA prior to issuing a Record of Decision regarding the proposed activities.

According to the list of activities identified under sections 24 of NEMA in Listing Notice 1 (GN. R. 544), Listing Notice 2 (GN. R. 545), and Listing Notice 3 (GN. R. 546), published in Gazette No. 33306 on 18 June 2010, effective from 2 August 2010, the proposed activities that trigger the need for environmental authorisation include:

- the transformation of undeveloped, vacant or derelict land to residential, retail, commercial, recreational, industrial or institutional use, inside an urban area, and where the total area to be transformed is 5 hectares or more, but less than 20 hectares;
- the construction of facilities or infrastructure exceeding 1000 meters in length for the bulk transportation of water, sewage or storm water with an internal diameter of 0,36m or more; or with a peak throughput of 120 litres per second or more;
- the construction of facilities or infrastructure exceeding 1000 meters in length for the bulk transportation of water, sewage or storm water with an internal diameter of 0,36m or more; or with a peak throughput of 120 litres per second or more; and
- the clearance of an area of 300m² or more of vegetation where 75% or more of the vegetative cover constitutes indigenous vegetation.

4.3 The Land Use Planning Ordinance (Ordinance 15 of 1985) (LUPO)

The site currently has a *Rural* zoning in terms of the Divisional Council Zoning Scheme. In order to accommodate the proposed development, a rezoning application, in terms of section 17 of the Land Use Planning Ordinance, no 15 of 1985 (LUPO), for the rezoning of the subject land from Rural to Subdivisional Area allowing for private road, private open space and Special Residential use rights, with conditional use for Group Housing, is currently being prepared. An application for the subdivision of the property, in terms of section 24 of LUPO, for the subdivision of the property into 102 group housing properties, three private open spaces and two private roads, will be submitted with the rezoning application. In addition an application for the relaxation of the prescribed 3m side and/or rear building lines to 0m in some instances where erven are situated adjacent to proposed private road and private open space in terms of section 15(1)(a)(i) of LUPO will be made.

The proposed development of the site has been in planning for some time, and the final proposal entails a significantly reduced development footprint, compared to the original proposal. The planning consultant argues that the proposed development will result in infill development in an area earmarked for residential development, which has taken into consideration the sensitive environmental attributes of the site. Specific positive aspects include the 15m wide buffer between the development and the TMNP, the large amount of

open space and the establishment of a homeowners' organisation that can maintain the open space and interface with the TMNP (Headland, 2012).

5.0 Policy Context

A number of planning policies has been prepared that include the site in question.

5.1 The Cape Town Spatial Development Framework (2012)

At this stage the Cape Town Spatial Development Framework, approved as structure plan in terms of section 4(6) of LUPO in May 2012, is the only legally binding land use planning framework that applies to the site. Figure 4 below presents an extract from the plan and indicates that site has been earmarked for "new urban infill".

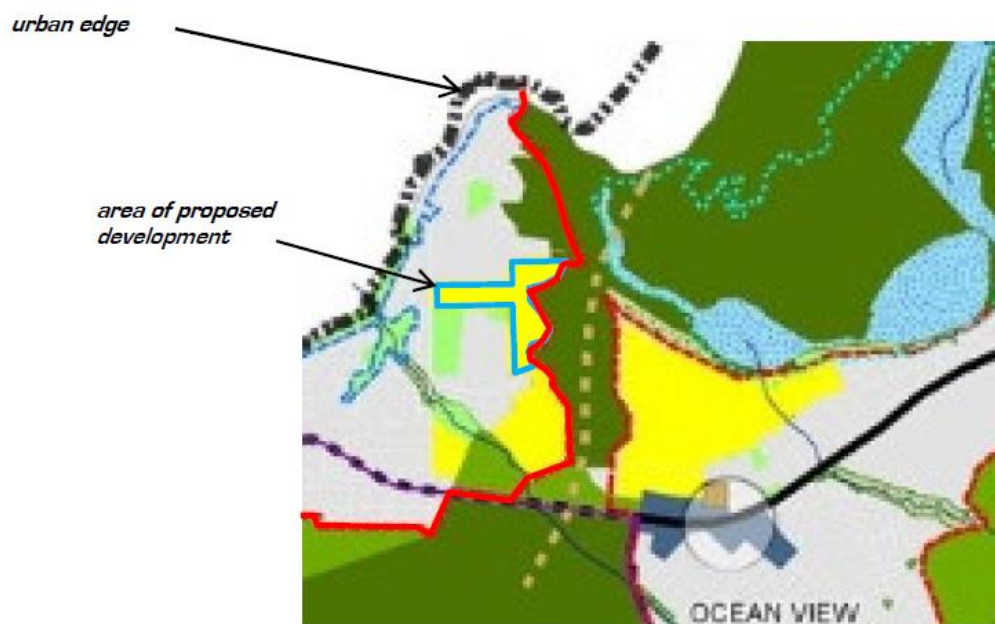
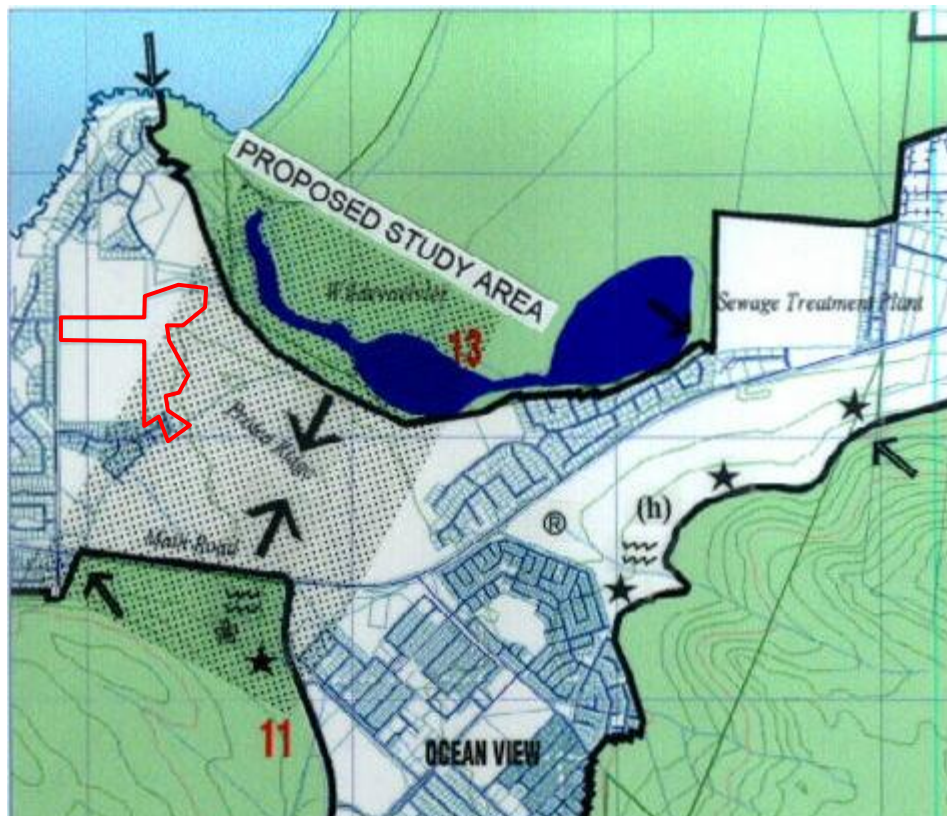


FIGURE 4: Extract from the City of Cape Town SDF, 2012 (diagram from Draft Planning Application prepared by Headland (2012))

Other plans that apply to site include the following:

5.2 The Peninsula Urban Edge Study (2001)

According to this approved policy, the site falls inside the urban edge. A portion of the site falls in a "proposed study area", which refers to a study to establish an ecological corridor along the dotted area (see Figure 5 below). The status of this study is unknown, but it would seem that this matter has been addressed in the subsequent Southern District Spatial Plan (see 5.4 below).



	Cultural/urban landscape
	Fauna,
	Flora,
	Forest
	Geology/Geotechnical Constraints
	Historical site/Monument
	Infrastructure
	Rivers/ Wetlands/ Floodplains
	Rural/Natural Landscape
	Topography/Slope steeper than 1:4,
	Scenic Routes, Skylines and Ridges
	Visual Prominence
	Noted criteria

FIGURE 5: Extract from Peninsula Urban Study Report – Kommetjie South urban edge and legend (NOTE: The heavy black line indicates the urban edge.).

5.3 Kommetjie – Ocean View and Environs Structure Plan (2000)

This report was never finally adopted as a Structure Plan in terms of the Land Use Planning Ordinance and thus has draft status. The report does not specifically refer to the site in question, but the diagram seems to indicate that most of the site is regarded as suitable for development.

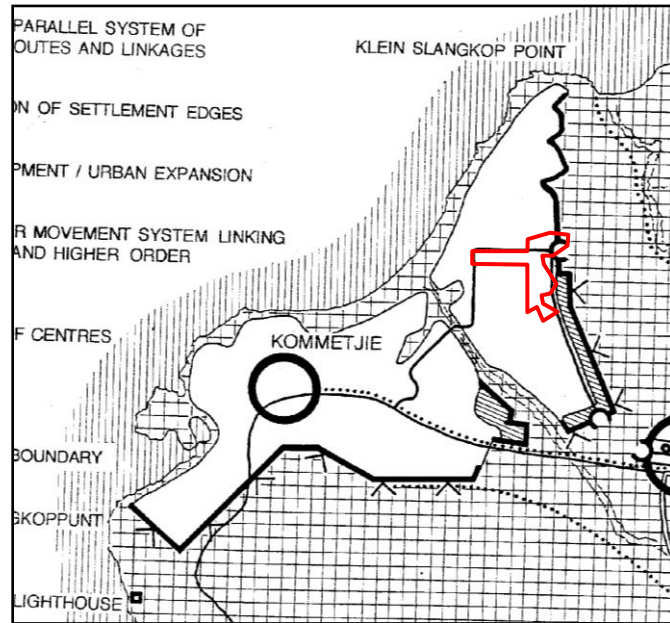


FIGURE 6: Extract from Kommetjie – Ocean View and Environs Structure Plan – Sub-regional Concept

5.4 The Southern District Spatial Plan (2011) (Draft)

The diagram below is an extract from the draft spatial plan for sub-district 4 – the Deep South, published in February 2011, and intended to provide more detail to the SDF referred to above. This plan has designated the site for potential low density development.

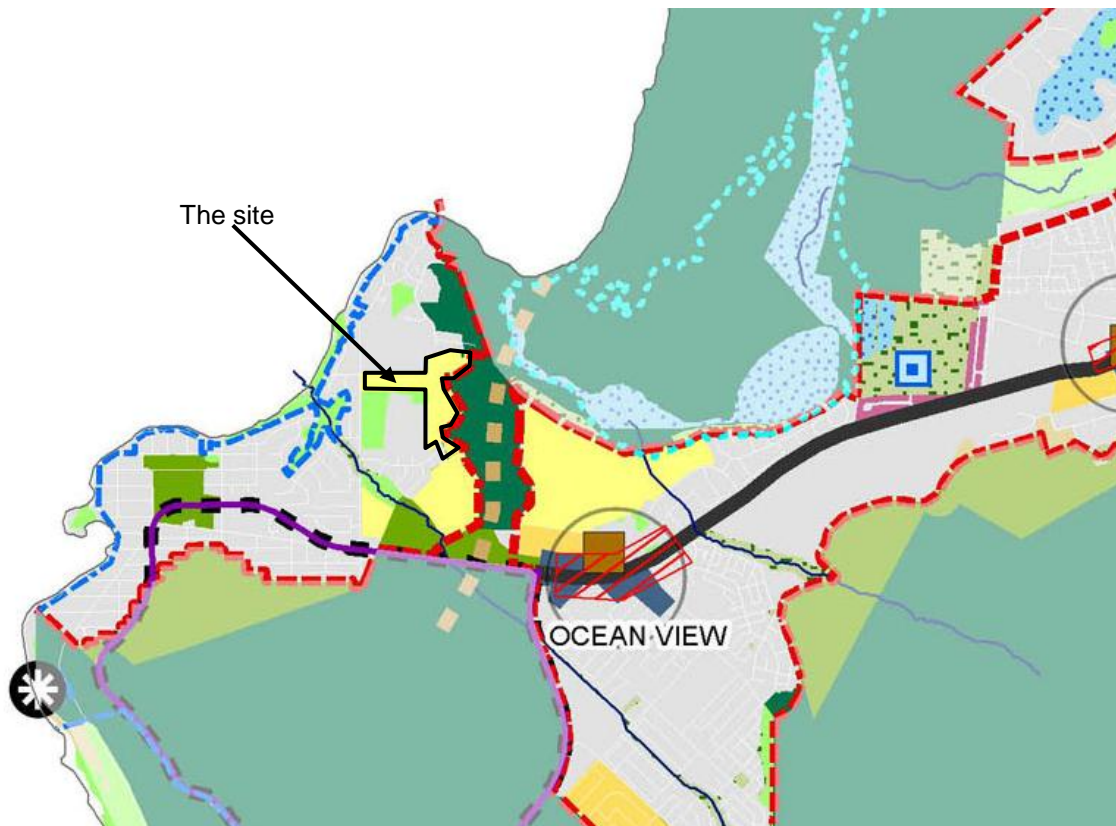


FIGURE 7: Extract from draft spatial plan for Sub-district 4, Southern District

6.0 Historical Background and Ownership

Farm 948, Kommetjie, originated from the grant of 30 morgen to Christina Diemer, widow Frederick Russouw in 1743, by Dutch East India Company Commissioner Gustav van Imhoff (Old Cape Freeholds Vol12. Folio 442). According to Midgley (1984:17) the farm was originally named Slangkop and later renamed Imhoff's Gift in recognition of the Commissioner. Land grants in the south peninsula at the time coincided with the establishment of a winter port at Simon's Town and the intention was that these new farms should provide produce to the port. Pierre Rocher acquired Imhoff's Gift in 1815 (Midgley, 1984:23) and deeds office records indicate that an adjoining piece of land known as "De Goede Hoop" was granted to a Jacobus Hurter in 1821, and another portion granted to Pierre Rocher in 1822 through quitrent tenure. According to Midgley, Hurter and Rocher jointly leased the saltpan between Slangkop and Noordhoek for a considerable period of time and in 1832 Pierre Rocher took over all the land, when Hurter passed away (1984: 23). Rocher sold the farm to Carel Wilhelm Cornelius Landsberg in 1839, and shortly afterwards, the land passed to Rocher's son Jean Pierre who was married to Landsberg's daughter. In 1858, Jean Pierre sold the property to Hablutzel and Hugo (Midgley, 1984: 25), who in turn sold it to Anton Benning in 1902 (Friends of the Kommetjie Library, 2002: 15).

According to the Cape Quitrent Deed CPQ41-27/1904 dated 28 April 1904, the following portions of land were regranted to the Kommetje Estates Limited on Perpetual Quitrent Tenure:

- *The land originally held by Pierre Rocher under titledeed dated 15 June 1822, registered Simons Town, folio 284*
- *A piece of land transferred to HP Hablutzel and PJ Hugo on the 4th February 1863, being a portion of the farm known as "De Goede Hoop" originally held by Jacobus Arnoldus Hurter under titledeed dated 18th February 1821, registered Simons Town, folio 265*

In addition the following portions were granted on Loan Freehold Tenure:

- *A piece of land known as "Imhoff's Gift" containing 62 morgen and 565 square roods, originally held by Christina Diemar, widow of the late Burgerraad, Fredrik Rossouw, under title deed 27 May 1743*

According to this deed, the property consisting of 2198 morgen and 160 square roods (1899 ha) was to be known as the "Kommetje Estate". These properties were consolidated in 1903 (Diagram 1421/1903) and the consolidated property formed the basis for the establishment of the towns of Kommetjie and Ocean View, through a large number of subdivisions, including expropriations. In 1913 a large portion of the farm, known as Imhoff's Gift was transferred to JG van der Horst. Although the General Plan for the development of Kommetjie dates back to 1904, the bulk of the town was developed from the 1960s onwards (see Figure 8).

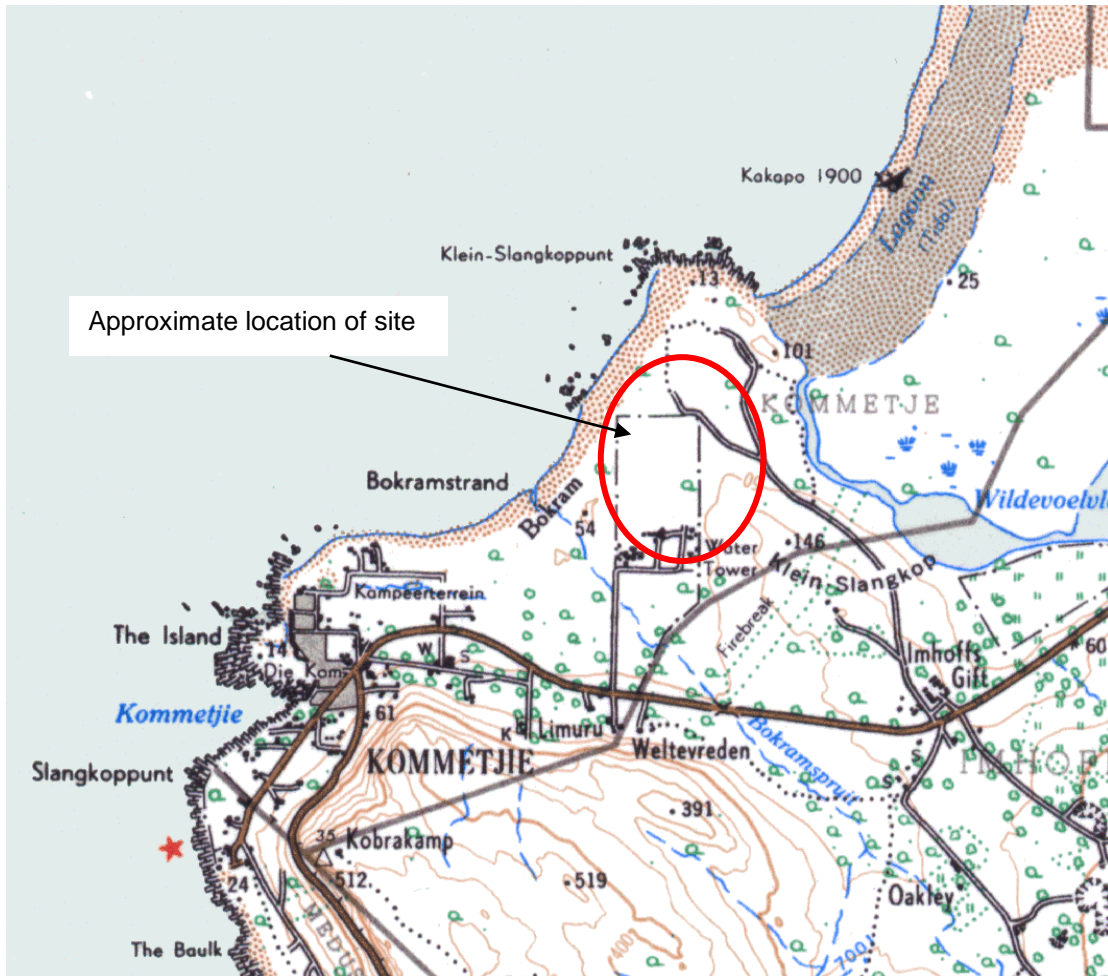


FIGURE 8: Extract from 1962 Topographical Map showing the extent of the Kommetjie at the time

The land in question is thus still a portion of the original consolidated farm regranted to The Kommetjie Estates in 1904 and is still owned by The Kommetjie Estates.

The Kommetjie Radio Station was at first constructed on the slopes of Slangkop in 1911, by Anton Benning for the General Post Office. According to Midgley (1984) it was moved to approximately 2 km from Imhoff's Gift farm (i.e. adjacent to the site in question), to a site adjacent to what is now known as Wireless Road on the eve of World War II, because of the poor reception under the Slangkop Mountain. The wireless station remained in operation during the war with the GPO and Royal Navy working together until 1960, when the GPO equipment was moved to Milnerton and the Royal Navy personnel were replaced by personnel from the South African Navy (Friends of the Kommetjie Library, 2002: 39). The site is still being used by the SA Navy as a radar/radio station site.

7.0 Assumptions and Limitations

7.1 Availability of Information

The findings and conclusions of this study are based on the information currently available, and are thus limited by the amount of definitive information available at the time of the assessment. In this regard is noted, that the Naval Radar/Radio Station site has to date not been graded and that undertaking this grading would require extensive research into the functioning of the site, and technology used over time on the site. This research falls out of scope of this assessment, but the author is confident, that these aspects, which are intrinsic to the site, will not be impacted by impacts on the context of the site. It should also be noted that the TMNP could not provide the author with definitive information on the heritage precinct identified to the north-east of the site.

7.2 Statement of Significance

The significance of cultural resource is dynamic and multifaceted, in particular as interest groups and societal values change over time. It is thus not possible to provide a definitive statement of heritage significance. In the context of this site, it is regarded as particularly complex as the site is regarded to have limited intrinsic value and contextual value. It is also noted that the perception of visual impact is a highly subjective issue.

8.0 Heritage resources and significance

8.1 Heritage resources

The definition of a *heritage resource* is described in Section 2 (xvi) of the NHRA as: “any place or object of cultural significance”. This section of the report fulfills the requirement of Section 38(3) (a) and (b) of the National Heritage Resources Act to assess the significance of the resources, and the mapping of the resources (NHRA 1999:64).

8.2 Criteria for the assessment of heritage significance

Cultural significance is defined in the Act as “aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance” (Section 2 (vi) NHRA 1999:8).

Section 3(2) and (3) of the NHRA expands on the meaning of cultural significance as follows:

Section 3 (2) lists the following as components of the national estate:

- (a) places, buildings, structures and equipment of cultural significance;
- (b) places to which oral traditions are attached or which are associated with living heritage;
- (c) historical settlements and townscapes;
- (d) landscapes and natural features of cultural significance;
- (e) geological sites of scientific or cultural importance;
- (f) archaeological and palaeontological sites;
- (g) graves and burial grounds;
- (h) sites of significance relating to the history of slavery in South Africa; and
- (i) movable objects.

According to section 3 (3) the cultural significance of a place or object is related to the following:

- (a) its importance in the community, or pattern of South Africa's history;
- (b) its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;

- (c) its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- (d) its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- (e) its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- (f) its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- (g) its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- (h) its strong or special association with the life or work of a person, group or organization of importance in the history of South Africa; and
- (i) sites of significance relating to the history of slavery in South Africa.

8.3 Assessment of the significance of the site

8.3.1 Intrinsic value

It is evident that the undeveloped site has limited intrinsic heritage value. The property has limited historical significance, even though the site originally formed part of the historic Imhoff's Gift and other historic land grants in the area. There is no evidence to suggest that the land in question was ever actively farmed (but possibly used for grazing) and, with the development of Kommetjie, the connection with the Imhoff's Gift werf has been lost.

Although the archaeological impact assessment found widespread distribution of stone artefacts (mainly quartz flakes, chunks and cores) which occur in very low density across the development footprint, probably of Later Stone Age origin, these were not considered significant. No other archaeological resources of significance were found on the site (Webley and Orton, 2011).

From an aesthetic point of view, the rocky outcrops on the site, below the Protea Ridge ridgeline are regarded as of some value. These outcrops have also been noted as an important habitat to vertebrate fauna (Headland, 2012: 14).

- **Scientific value**

The site does have scientific value in that it contains seven plant species of *conservation concern* and three vegetation types, namely Peninsula Sandstone Fynbos, Cape Flats Dune Strandveld and Hangklip Sand Fynbos, that are regarded as threatened habitats on a national basis. The map below, extracted from the botanical impact assessment (Helme, 2011), illustrates the location of the species and demarcation of conservation-worthy portions of the site from a botanical perspective.

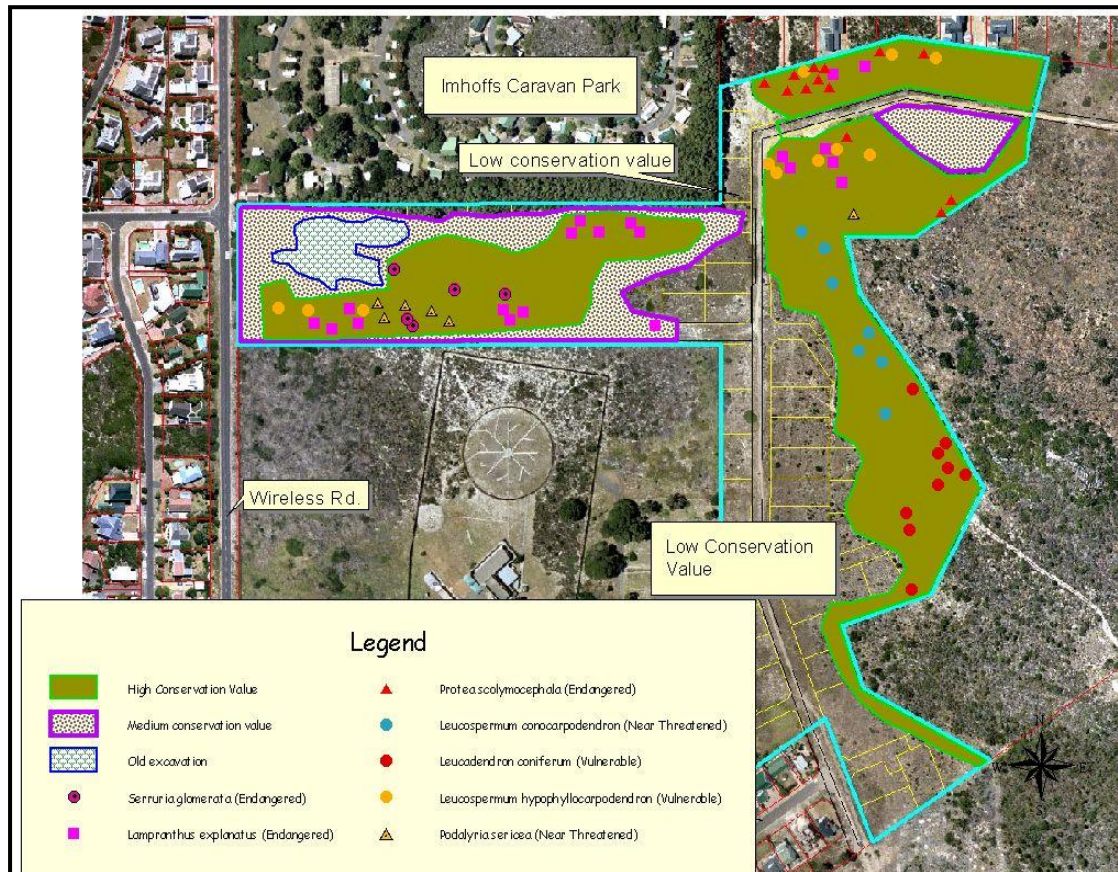


Figure 9: Botanical resources from Helme, 2011: 14

8.3.2 Contextual value

- *Relationship with Table Mountain National Park*

As suggested in the response of HWC to the NID, it could be argued that the site has **contextual value** largely related to its location adjacent to the Table Mountain National Park, a grade 1 heritage resource. The statement of significance of the Table Mountain National Park has been set out in the Heritage Resources Management Plan for the park (dated 2004). The statement includes some 15 paragraphs which encapsulate the nature and range of heritage resources found in or inherent to the park (South African National Parks, 2004: 14-18). These include inter alia the presence of archaeological sites, historical settlements, graves and burial sites, sites of geological importance, sites related to the history of slavery, landscapes and natural features of cultural significance and significant aesthetic characteristics valued by communities. This plan also mapped heritage resources and 25 heritage precincts have been identified each of which contains an agglomeration of heritage resources. Figure 10 below includes an extract of the map of these precincts as contained in the 2006-2011 Conservation Development Framework for the TMNP. The Wildevoël Vlei and the fore dune behind the back shore lagoon have been identified as a heritage precinct. Mike Slayen, planner at the TMNP, could not provide the author with details of the heritage resources related to this precinct, but noted that it possibly entails archaeological resources (middens) (email correspondence, 29 October 2012).

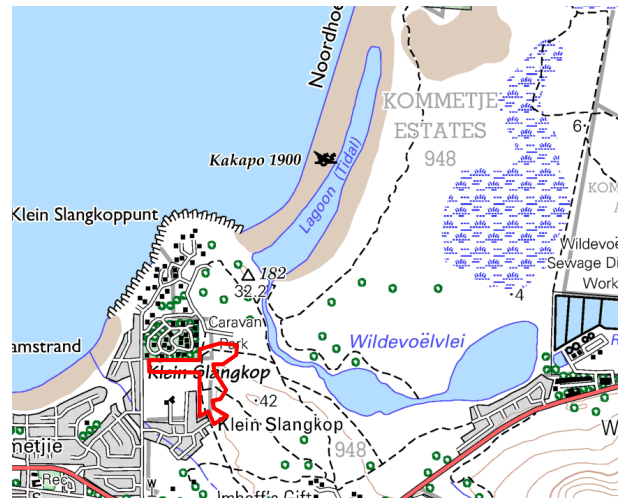


Figure 10: The location of the site in relation to the identified heritage precinct in the TMNP. The extract from the 1:50 000 map provides a clearer understanding of the site in relation to the vlei and lagoon.

In addition the Heritage Resources Management Plan listed 16 *priority areas* for the development and implementation of conservation management plans. No areas in proximity to the site are included in the list (The Fish Hoek caves seem to be the closest), nor are any sites listed as receiving attention already close to the site (South African National Parks, 2004: 64).

- *Naval Radar/Radio Station*

The site is also located adjacent to the Naval Radar/Radio Station site, which seems to have been identified as a heritage resource by the City of Cape Town in the draft Southern District Spatial Plan (2011). As noted in the historical background, the station was established in the late 1930s (an exact date could not be established). The site includes buildings and structures related its role as a radio/radar station site as well as 4 houses with outbuildings – situated along the eastern boundary of the site. See Figure 11 and photographs below.

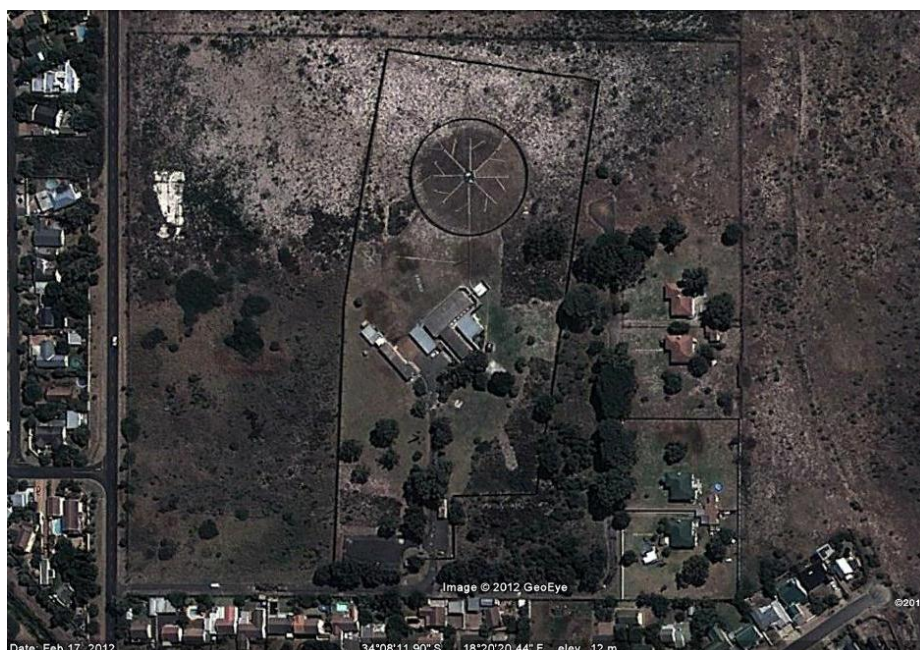


Figure 11: Google earth image of the naval radar station site



PHOTO 12: The view onto the back of the houses on the Naval Radar Station site from the site



PHOTO 13: One of the houses on the Naval Radar Station site

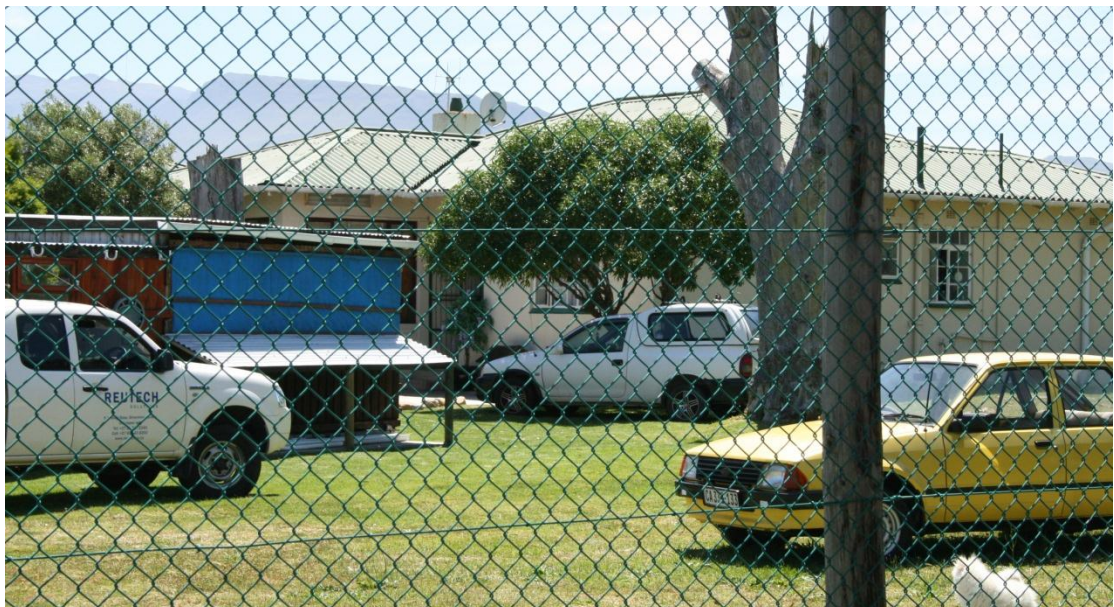


PHOTO 14: The southern-most house on the Naval Radar Station site as viewed from the stoep of the adjacent private house facing onto the site



PHOTOS 15 & 16: Structures on the naval radar station site

As the site is a restricted area, it has been difficult to get a full understanding of the buildings and structures on the site. It would seem that the houses on the site date to the 1930/40s – they appear on the 1945 aerial photograph. They are not regarded as exceptional examples of their period or functional style and some have been altered. The layout of the site is such that the houses are only partially visible from Wireless Road, beyond the fences of the site, and also present their backs to the boundary of the site in question, some are also fenced off with vibcrete walls, and thus do not contribute to a potentially significant streetscape or townscape. In addition the buildings related to the radar station function itself seem to have been altered and added on extensively over time – these buildings would have negligible architectural heritage value.

It is likely that the site has historical value, related to its role in the coastal defence during World War II, as well as potentially some social and technological value. Social value could potentially be related to the role of women in the war effort during the Second World War and the technological value would depend on the level of innovation of technology used on the site and whether or not the original technology is still present or used on the site. With regard to contextual value, it is noted that the site was originally isolated from development, but suburban development has now caught up with the site, so that it is bounded by residential development to its south and west, with houses overlooking the site through the wire mesh fence. Thus it would seem that isolation is not a priority from a technological or security point of view.

No record of any previous grading of the site could be found; it is understood that the site will be graded as part of the inventory of heritage resources being prepared by the City of Cape Town at present. For the purposes of this report, it is regarded as sufficient to consider the impact of the proposed adjacent development on the various aspects noted above (historical, technological and social heritage value) that will be considered when the site is graded.

8.4 Conclusion

The site, because of its limited intrinsic heritage resources, is regarded as ungradeable. It also has limited contextual value – it is located adjacent to the TMNP, although no heritage resources that could possibly be affected by development on the site could be identified in any of the TMNP’s heritage studies in close proximity to the site. The Naval Radar/Radio Station site still has to be graded, but it is evident that the heritage value of this site, would be related to intrinsic resources, rather than contextual or aesthetic resources.

Figure 12 over leaf provides a map of the heritage resources on or related to the site.



Figure 12: Heritage resources on or related to the site

9.0 Heritage Indicators

9.1 Design priorities

Following on section 8 above the following design priorities have been identified:

- Priority 1: Ensure that sense of the Table Mountain National Park in the vicinity of the site is retained.
- Priority 2: Retain patches of vegetation indicated as of high conservation value
- Priority 3: Do not allow development on rocky outcrops
- Priority 4: Ensure that the development does not impact on the potentially significant heritage resources of the Naval Radar Station site, such as the historical and possible technological or social heritage resources associated with the site.

9.2 Heritage Indicators

These design priorities have been translated into heritage indicators as follows:

1. *Development should not crest the ridge to the east of the site, so as to avoid visibility from the TMNP.* This in effect calls for a substantial buffer between the site and TMNP as well as restrictions to the height of development on the site and careful consideration of the fencing of the eastern boundary of the site.
2. *Where development will be visible from the TMNP, development should be of a scale and massing similar to adjacent development so as to be read as part of such development.* It is noted that due to the topography of the site, the north eastern portion of the site is visible from the TMNP and the south eastern portion may also be visible from elevated areas to the east of the site. In this regard it is noted that development on the Klein Slangkop Estate to the north of the site, is visible from the TMNP, as well as the Riverside residential area to the south of the site.
3. *The layout should accommodate the retention of valuable patches of vegetation as well as the rocky outcrops on the site.*
4. *The impact of the development on the setting the houses on the Naval Radar/Radio Station site should be softened by sensitively scaled development, appropriate fencing and landscaping.*

In this regard it is noted that development has been allowed up to the boundary of the site on the southern side, with some houses facing onto the site, with views through the wire mesh fence onto the houses, and the remainder of the site.

With regard to the Naval Radar/Radio Station, no other indicators have been identified, as it would seem that adjacent development will not impact on the functioning of the site, and thus any of the intrinsic heritage resources possibly associated with the site, as referred to in section 8.3.2.

10.0 The Proposed Development

Three development alternatives have been put forward for assessment. Alternative 3 is the preferred development alternative.

10.1 Alternative 1

Alternative 1 entails the following:

- 102 residential erven and associated infrastructure, spread over the entire area of the site
- A crèche, place of worship and 3 small portions of public open space.

Access will be via Wireless Road and Riverside Drive, with an emergency access via Klein Slangkop Estate.

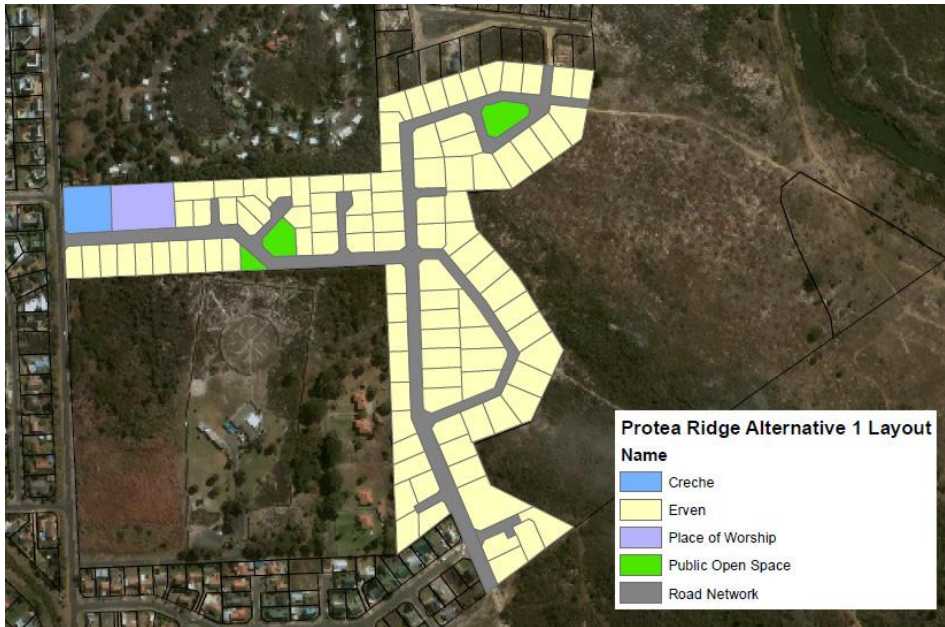


Figure 13: Alternative 1 proposed layout

10.2 Alternative 2

Alternative two entails the following:

- 63 residential erven and associated infrastructure; and
- a crèche and large public open space areas.

Access will be via Wireless Road and Riverside Drive.

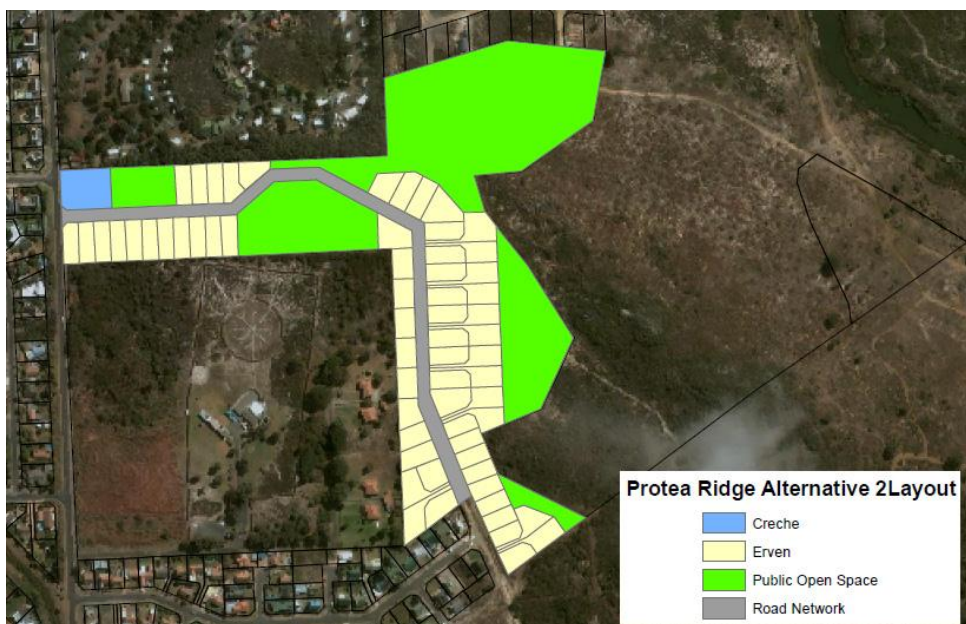


Figure 14: Alternative 2 proposed layout

10.3 Alternative 3

The layout for Alternative 3 has been determined by the findings of the various environmental studies undertaken on the site, with the botanical study, updated after the fire on the site in early 2011, taking precedence in determining the areas where development could take place.

This proposal entails:

- 102 single residential erven in two distinct sections, but no crèches or places of worship.
- 16 erven in the the western arm of the site will get access off Wireless Road, whilst the remainder would get access off Riverside Drive.
- Private open space will cover 57% (5.8ha; including an 870m² detention pond), roads 11% of the area, and the remaining 32% would be covered in single residential development.
- The eastern portion of the site, between the edge of the development and the TMNP will be managed by the TMNP.

With this alternative a larger buffer zone between the site and the TMNP has been introduced and it is evident that the development is more responsive to the topography of the site and the need to reduce the visual impact on the TMNP. Design guidelines and a landscaping plan were also prepared for this alternative. These are included in Annexure E.

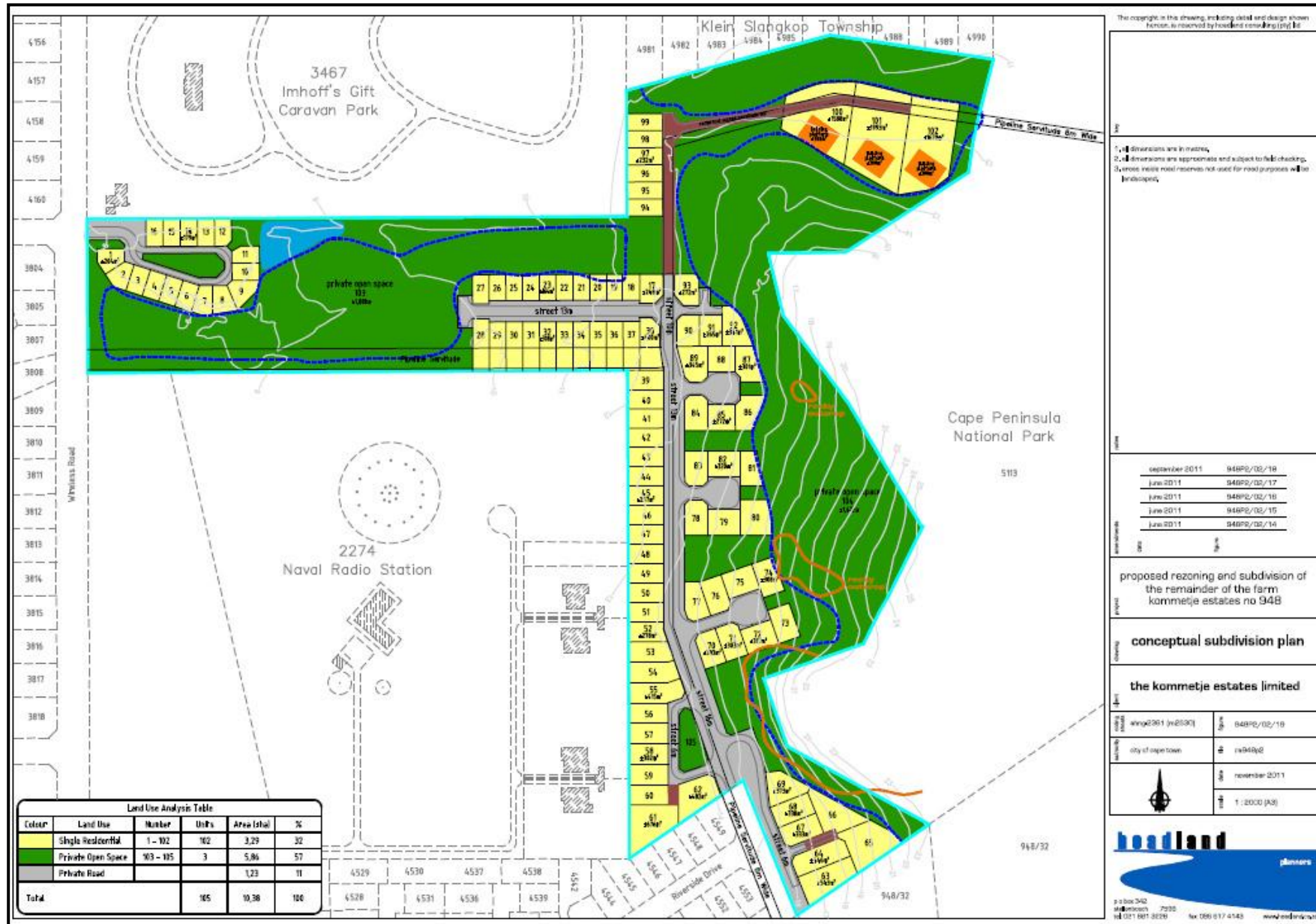


Figure 15: Alternative 3 proposed layout. The dotted blue line indicates the primary areas of botanical sensitivity, as modified in June 2011.

11.0 Assessment of the development proposals

Annexures F and G contain details of the assessment criteria as well as the assessments of the potential impact of the development on heritage resources. This section provides a summary of the most salient points. As it is evident from the description of the heritage resources, the limited heritage value of the site is largely related to its context, thus visual impacts are regarded as potentially the most significant impacts. The assessment of the impacts has thus to a large extent been based on the findings of the visual impact assessment (Van der Stok, 2012). In this regard the VIA concludes the following:

The site has a medium visual absorption capacity due to the relatively small area of the proximate viewshed and the screening nature of the local vegetation and existing structures such as the tree lines within the caravan park, the existing houses along the western side of Wireless Road, and the trees along the eastern edge of the naval site. This in conjunction with the relatively high compatibility of the development with the surrounding land usage results in a visual impact which should be relatively easily absorbed by the existing visual environment and should not affect the sense of place in an unacceptable way.

11.1 Alternative 3 – the preferred development option

The following potential impacts on heritage resources for this option have been identified:

- Visual impacts on the Table Mountain National Park and impacts on its sense of place
The VIA concluded that as the site is shielded from the TMNP by the Protea Ridge (which falls within the Park), the visual impact on the TMNP will not be significant. The only area where the visual impact will be significant, will be the small portion of land between the site boundary and ridgeline (i.e. immediately to the east of the site) – Refer to figure 12. Given that the views from this sliver of land will also take in the existing suburban development in the immediate vicinity of the site, this impact is regarded as negligible – the issue at stake is rather the visual impacts on the bulk of the portion of the TMNP to east of the Protea Ridge.

As the bulk of the development has been kept below the Protea Ridge ridgeline, the visual impacts on the TMNP and its sense of place is regarded as of medium to low significance - with mitigation this impact drops to low. Only three houses in the north-eastern corner of the site will be visible from the TMNP, and the proposed mitigation, set out in the VIA requires the final designs of the buildings to be such that no part of the house exceeds the height of the portion of the ridgeline immediately south of the erven. The entire development will then not be visible from the bulk of the park and the visual impacts on the park minimised (Van der Stok, 2012:17).

The VIA also found that it may be possible that there are some partial views of the three larger houses in the north eastern portion of the site from the *more elevated viewpoints* to their east but the existing houses in Klein Slangkop (i.e. potentially including portions of the TMNP further away) will be visible from these same viewpoints and therefore the sense of place will be affected but not changed significantly. Similarly it is noted that the houses to the east of the end of Riverside Drive may also be partially visible from elevated points in the landscape to their east, but once again, the existing development along Riverside Drive will also be visible in these views and so a significant change in the sense of place will not occur (Van der Stok, 2012:17).

The VIA describes the intensity of the visual impact from the TMNP as medium-low and low with mitigation (Van der Stok, 2012: 22). From the perspective of impacts on heritage resources, given that no heritage resources have been identified in the TMNP in the immediate vicinity of the site, the significance of this impact is rated as low.

- Visual impacts on the Naval Radar/Radio Station site

In response to the NID, HWC requested that the visual impact on the Naval Radio/Radar Station site be addressed in the HIA. Section 8 of this report, noted that the site potentially has some heritage value related to its role in the WWII, technological innovation and social history. These aspects are inherent to the site, and will not be affected by the development. The houses on the site, although most probably older than 60 years, are not regarded as of such significant heritage value so as to preclude development behind these structures. The VIA concluded that the intensity of the visual impact of the development on the site will be medium and medium to low with mitigation. Mitigation measures include vegetative screening of fencing, fully articulating the rear facades of all buildings facing onto the naval site and the Wireless Road edge so that they do not present a 'backyard' face to the potential views from these areas and controlling the lighting on the site (see section 11.5 below) (Van der Stok, 2012: 21 & 27). From a heritage perspective the significance of the impact is regarded as low.

- Impacts on valuable indigenous vegetation and rocky outcrops

As noted in section 8 the site is regarded as having scientific value in that it contains conservation-worthy indigenous plant species as well as rocky outcrops which are important in the habitats of vertebrate fauna and in addition have some aesthetic value.

As the preferred alternative responded to these informants by avoiding the patches of valuable vegetation and the rocky outcrops, the impacts have been rated as low by the respective assessors (Helme, 2011 & Harrison *et al*, 2012). From a heritage perspective the significance of these impacts is regarded as low at the most.

11.2 Alternative 2

- Visual impacts on the Table Mountain National Park and impacts on its sense of place

In this alternative it is possible that the development on the westerly slopes of the Protea Ridge, may be visible from the TMNP to the east of the site, i.e. crest the ridgeline. The VIA has rated the intensity of this impact as medium negative and medium-low with mitigation. From a heritage perspective this impact is regarded as moderately significant.

- Visual impacts on the Naval Radar/Radio Station site

In this alternative a larger section of the site will have development immediately adjacent to its fence. The VIA has thus rated the intensity of the impact as high and medium with mitigation (as set out above). From a heritage perspective this impact is regarded as moderately significant.

- Impacts on valuable indigenous vegetation and rocky outcrops

Alternative 2, although an improvement on Alternative 1 from a botanical perspective, would have a medium to high negative impact on the areas containing valuable vegetation in the

western arm of the site, and the five associated threatened plant species. According to the botanical assessment, mitigation would essentially entail a layout similar to that proposed for Alternative 3, plus all other mitigation noted for Alternative 3 (Helme, 2011: 23). From a heritage perspective this impact is regarded as moderately significant.

11.3 Assessment of Alternative 1

- Visual impacts on the Table Mountain National Park and impacts on its sense of place
According to the VIA the intensity of the visual impact on the TMNP will be high for Alternative 1 as a result of the greater footprint of the development as well as the fact that the houses rise higher up the slopes of Protea Ridge. Specifically, the houses at the north-east corner of the site adjacent to Klein Slangkop will be visible over a far greater area of the park (Van der Stok, 2012: 22). From a heritage perspective this impact is regarded as moderately significant.

- Visual impacts on the Naval Radar Station site
According to the VIA the intensity of the visual impact on the naval site will be relatively high as the edge conditions on two of the site's boundaries will be entirely altered. Alternative 1 will result in development along the bulk of Naval Radar Station site boundary (as opposed to Alternatives 2 and 3). The VIA rated the intensity of this impact as high and medium-high with mitigation. From a heritage perspective this impact as regarded as moderately significant.

- Impacts on valuable indigenous vegetation and rocky outcrops
It is evident that this alternative will have a high negative impact on both the indigenous vegetation on the site and the rocky outcrops. This impact is regarded as unacceptably high in the botanical assessment (Helme, 2011: 23). From a heritage perspective this impact is regarded as highly significant.

11.4 No-Go option

The no-go option should be assessed in terms of the existing use rights, which is a *rural* zoning. Therefore the land could be used for farming and in particular of an extensive nature, without special consent (in terms of LUPO) having to be obtained before commencement of operations. However, it must be noted that NEMA could still be applicable in terms of certain activities that could otherwise be allowed. Agricultural buildings and structures are also allowed in terms of this zoning but these would have to comply with the building clauses and provisions of the local municipality and the applicant would need to ensure that no listed activities in terms of the NHRA (e.g. changing the character of site larger than 5000m²) or NEMA are triggered (Doug Jeffery Environmental Consultants, 2012).

However, it is evident that the location of the proposed site, within the context of its surrounds, does not lend itself to farming activities and the no-go option would probably result in no development on the site. The no-go option will clearly have no impacts (visual or otherwise) on the TMNP and Naval Radar Station site. The VIA rates the intensity of these impacts as low (Van der Stok, 2012: 22), because of potential visual impacts related to invasion of alien vegetation.

However the botanical assessment, rated Alternative 3 as more desirable than the no-go option because it could have number of negative impacts including heavy grazing, partial

development (according to its zoning), inappropriate fire regime management, and lack of alien invasive plant management. According to Helme (2012: 24), the likelihood of any or all of these actually happening depends on a range of factors that cannot be predicted, but it is likely that at least some negative impacts may be felt. In addition, the no-go alternative means that the eastern parts of the site would not be contracted into the Protea Ridge Corridor and would then not be managed by TMNP. From a heritage perspective this is regarded as moderately significant.

11.5 Mitigation measures

As the identified impacts are related to visual and botanical impacts, the mitigation measures set out by these specialists are presented here:

11.5.1 Mitigation measures for visual impacts (from the VIA by Van der Stok, 2012)

- *Introduction*

Most of the mitigation measures mentioned below have already been taken into consideration in the layout and architectural guidelines. The basic principles that are required for visual mitigation are however repeated here so that they can be used as a basis for any potential future changes to the guidelines, should this be necessary.

- *Layout*

The primary visual mitigation measure will be the implementation of Alternative 3 as opposed to the other development alternatives. Many of the mitigating factors are included in the design of this alternative with the changes to the Wireless Road and the Table Mountain National Park interface being significantly better within the local context.

- *Architectural*

- A strict set of architectural guidelines which will clearly define the parameters within which detailed design work of the individual structure can take place has been developed and has been included in Addendum 1 of the VIA (and Annexure E of this report). These design guidelines will ensure an overall cohesiveness without enforcing uniformity. Too much uniformity would have the effect of emphasizing the scale and density of the development, and has the potential to increase the visual impact rather than lower it.
- Every attempt must be made in the architectural design to minimize the apparent bulk of the buildings. They are not to appear monolithic but rather created of smaller units that are visually stimulating and allow for the interplay of light and shade.
- A maximum height limit of 8.0m measured above the midpoint between the highest and lowest points on each erf before any excavation has taken place must be strictly implemented. If possible the second floor spaces must be tucked into the roof so as to lower the roofline.
- No artificial plinths to increase the view are to be allowed. Every attempt must be made to ensure that the development reads as being set into the landscape rather than being imposed upon it.
- The design of all the houses on the slopes of Protea Ridge must be checked to ensure that the houses are not seen from within the Table Mountain National Park floating above the ridgeline. This is particularly true for the three larger erven in the north-eastern corner of the site. For these erven it may not be possible to use the full 8m height restriction.

- The roofscape must be made up of smaller areas that do not exceed the average local roof size. Single large areas of roof in the same plane are to be avoided. This can be attained by the use of flat areas between pitched areas and the use of different heights and planes.
- The rear facades of all buildings facing onto the Table Mountain National Park, the naval site and the Wireless Road edge must be fully articulated so that they do not present a 'backyard' face to the potential views from these areas.
- The entrance on Wireless Road must be understated and in keeping with the existing ambience of the area. A large gate structure and signage would be inappropriate.
- Specific care must be taken with the house designs on erven 61 and 62 in the development so that privacy is maintained for erven 4466, 4567, 4548 and 4549 at the end of Riverside Drive.
- Satellite dishes are to be placed as visually unobtrusively as possible and must be kept off the roof lines.
- *Colours and finishes*
 - White is not to be used as a main colour on any of the buildings, but it can be used in a limited way as an accent colour.
 - In general colours and textures must be chosen for their ability to blend into the surrounding environment with light earth-tones being predominant.
 - Variation of colours, textures and finishes should be used to break up the apparent bulk of the buildings.
 - Roofs are to be medium to dark grey as this is the colour that best blends into the environment in all light conditions and across the seasonal colour changes. No bright or contentious colours are to be allowed.
- *Landscaping*
 - Landscaping will be key in creating and maintaining a visually acceptable environment which is appropriate to the existing visual context.
 - Vegetative screening by means of trees and shrubs must be used to break up the perceived scale of the development to views from Wireless Road and The Table Mountain National Park.
 - Planting is to be used to soften the impact of the built forms. This includes planted pergolas over patio and balcony areas and the use of vines on walls.
 - The planting of adequate screening vegetation along the Wireless Road edge must be mandatory. This must be the responsibility of the developer submitting this application whose responsibility it must remain until it can be transferred to the Home Owner's Association.
 - It is suggested that the berm planned along Wireless Road be omitted and that views into the green corridor along the naval site edge be allowed and framed by the spacing of the trees in this area. This will maintain the open natural sense of place along the eastern edge of Wireless Road. All visual barriers must seem natural and a berm would add an unnatural visually constricting element along the road without significantly shielding the Squires Lane houses from sight.
- *Lighting*
 - It is essential that light spillage and pollution be kept to an absolute minimum. To this end all external lights must be shielded in such a way that only the area that is meant to be lit is actually lit, and light is not allowed to spill into the surrounding landscape.

- The aim is to have no naked light sources, i.e. the light bulbs themselves, visible from outside the site. Only reflected light should be visible away from the site. This is especially true of any security lighting that may be installed. (Note that lights with translucent shields are considered to be direct sources of light and should also not be used where they can be seen away from the site.)
- Overhead street lighting is not to be used but low bollard type lighting can be used where necessary for safety purposes.
- Please see Addendum 3 of the VIA for guidelines concerning the use of lighting.
- *Fencing*
 - To maintain the open nature of the area and the visual links with the surrounding natural terrain, solid fencing, including fencing with masonry pillars should be kept to a minimum.
 - Fencing is to be by means of visually permeable weld mesh or equivalent, plain galvanized or painted dark grey or black. Green is not acceptable.
 - Vegetative screening of the fencing is to be encouraged where possible and appropriate.
 - Razor wire should not be used. Where security measures are necessary, visually unobtrusive solutions must be found.
 - It is suggested that the form of fencing along the boundary with erven 4566, 4567, 4548 and 4549 (at the end of Riverside Drive, to the south of the site) be discussed with the homeowners. A masonry wall, as shown in the fencing plan may not be acceptable as it will have a high visual impact on these erven. Some form of lighter fencing with vegetative screening may be considered more appropriate. The solution must however take the security situation into consideration.
 - It is also suggested that the masonry wall at the end of Riverside Drive and in front of erven 53 to 69 in the development be omitted and be replaced by type A fencing with vegetative screening. This will prevent the view up Riverside Drive being terminated by a solid structure and will help in maintaining the visual link with the natural slopes in the background.
- *Construction Phase*
 - The construction phase, both for the infrastructure and for each individual building, is to be of limited duration to be determined in the architectural guidelines and environmental management plan. This is to ensure that any portion of the development does not become a permanent building site.
 - There is to be a strict ban on any construction activities outside of the development footprint and construction workers are to be stopped from using the natural areas for any purpose whatsoever.
 - All stock piles of buildings materials are to be protected against dispersion by any means into the surrounding terrain. This is especially true of cement and diesel which can have a significant long-term negative effect on the visual environment if inappropriately used.
 - All builders' rubble is to be removed from the site timeously and dumped at a registered dump site.
 - All construction scars are to be rehabilitated immediately after construction is complete. This is especially true for all activities related to the supply of infrastructure, some of which may be outside the development area. (i.e. sewer and water connections, etc.)

- The generation of dust is to be strictly limited.
- Litter is to be strictly controlled.
- The use of fire is to be strictly controlled so that the natural vegetation is protected.

11.5.2 Mitigation measures for botanical Impacts (from Botanical Impact Assessment by Helme, 2011)

- *Design phase*
 - No bulk services should impact on mapped areas of high botanical sensitivity, except where this is unavoidable, such as where these are within existing designated pipeline servitudes (see Figure 3 of BIA for existing servitudes).
- *Construction Phase:*
 - The outer boundaries of all approved development footprints and erven must be surveyed and demarcated prior to construction of any bulk services. Demarcation should be by means of posts that are at least 1m tall, and strung with coloured rope. The proposed detention pond position should also be demarcated before development.
 - No heavy machinery or personnel on site should be allowed outside the demarcated development areas at any stage.
 - No temporary dumping of building materials or sand should be allowed outside the demarcated development areas.
 - No invasive alien grasses (such as ryegrass or oat straw) may be planted or introduced for sand stabilisation or any other purposes.
 - An ECO should be regularly on site (at least once a day) during the bulk services phase, and should be responsible for adherence to all environmental requirements, and the fining and reporting of any infringements.
- *Operational Phase*
 - Presumably a Home Owners Association (HOA) will be set up, which should then become the managing authority for the conservation area (Private Open Space) area of at least 1.88ha in the western arm of the development. The developer should ensure that there is adequate funding for all ongoing environmental management requirements that will have to be overseen or subcontracted by the HOA. This funding usually comes out of a HOA levy and this may be an appropriate method in this case.
 - No alien invasive vegetation (as per CARA legislation) may be planted or maintained anywhere on the development. In this regard it is worth specifying that kikuyu grass (*Pennisetum clandestinum*) is a highly invasive species and perhaps the biggest threat to the natural vegetation on site, and may not be maintained or planted anywhere on the development, neither within private erven nor within public areas.
 - Ongoing alien invasive management must be undertaken every year throughout the development and conservation area. Appropriate, DWA approved methodology should be used, and no herbicide may be sprayed anywhere within the conservation areas, due to significant impacts on adjacent non-target species.
 - Gardens on private erven may cultivate exotic but non-invasive species, but all landowners should be encouraged to plant only suitable locally indigenous Strandveld and Fynbos species.
 - The Fynbos in the conservation area is part of a fire driven system, and thus needs fire once every 10 -15 years. As the entire site burned in 2011 this gives the HOA

some leeway prior to the next fire being necessary. A fire management plan must form part of the overall Environmental Management Plan (EMP) for the site, which is to be overseen by the HOA. Drawing up this plan and the carrying out thereof could be subcontracted to a person or organisation with experience thereof. The entire conservation area should be burnt once every 10-15 years, ideally in late March or April. 5m wide firebreaks around the edges could be cut by hand no more than two weeks prior to the controlled fire.

- Monitoring of the environmental management on site should be undertaken by an independent professional, or by City of Cape Town Environmental Management staff. This should commence within one year of any approval of this project, and should thereafter be once a year for the first five years after approval, and thereafter every two years. The person monitoring should focus on condition of the natural vegetation in the conservation area, presence of alien vegetation, and any other disturbances that need to be controlled and they should prepare a report for the HOA.

12.0 Conclusion and Recommendations

In summary, the key heritage issues that affect the site are issues of visual impact particularly from TMNP, and valuable indigenous vegetation on the site itself. Even though the heritage value of the adjacent Naval Radar/Radio Station site has not been fully unpacked in this report, the author is confident that the proposed development will not impact on the heritage resources that may exist on the site, such as technological heritage resources (possibly the mast), historical and social heritage resources.

As noted in the report, the development of the site has been on the cards for some time and development of the site is supported by the City of Cape Town, as indicated by its inclusion in the urban edge. Proposals for the development of the site have been refined over time and the environmental informants which includes addressing visual impacts and the protection of valuable flora, have been considered and addressed satisfactorily in Alternative 3, the preferred option.

Thus it is recommended that:

- This HIA be endorsed as having met the requirements of section 38 of the NHRA;
- The preferred development option be supported, subject to the mitigation measures set out in section 11.5 of this report.

13.0 References

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Heydorn, AEF & Grindley, JR, 1981: *Estuaries of the Cape. Part II, Synopses of Available Information on Individual Systems, Report 27 Noordhoek/Wildevoelvllei*. Stellenbosch: National Research Institute for Oceanology, Council for Scientific And Industrial Research.

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Van der Stok, A, 2012: *Visual Impact Assessment, Protea Ridge Housing Development, Cape Farm "The Kommetjie Estates" No. 948, Kommetjie, Cape Town*.

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ANNEXURES

ANNEXURE A: Response from HWC to NID

Our Ref: HMCAPETOWN METROPOLITANKOMMETJIE\PROTEA RIDGE FARM 948



Enquiries: Jenna Lavin

Tel: 0214839685

Email: jenna.lavin@pgwc.gov.za

Date: 25 July 2012

Case No: 120718JL05E

Auto IDs: 1870 - 1957

RESPONSE TO NOTIFICATION OF INTENT TO DEVELOP
In terms of section 38(8) of the National Heritage Resources Act (Act 25 of 1999)
and the Western Cape Provincial Gazette 6061, Notice 298 of 2003

Attention: Ms Lize Malan
4 Rose Street
Paarl
7640

CASE NUMBER: 120718JL05E

NID: PROPOSED RESIDENTIAL DEVELOPMENT ON PROTEA RIDGE, FARM 948, KOMMETJIE

The matter above has reference.

Your NID dated 17 July 2012 was tabled and the following was discussed;

1. The proposed residential development consists of 102 erven on land that is currently vacant
2. The development borders Table Mountain National Park to the east however it will be set back from the TMNP with private open space, and separated from the TMNP by a ridgeline
3. The bulk of development will not be visible from the TMNP
4. The site is adjacent to a pre-WWII naval radio station however no significant heritage resources were identified as being impacted by the proposed development
5. An Archaeological Impact Assessment has been done for the site previously
6. Later Stone Age artefacts were identified on site. These have low significance

Decision

1. Since there is reason to believe that heritage resources will be impacted upon, HWC requires an HIA in terms of S. 38(3) of the NHRA (Act 25 of 1999) assessing the impacts on archaeology, and the visual impacts of the proposed development on the heritage resources of the World Heritage Site of Table Mountain National Park and the WWII Radar Station.
2. Written comment from SAHRA is required for this proposed development.

Terms and Conditions:

Heritage Western Cape reserves the right to request additional information as required.

Should you have any further queries, please contact the official above and quote the case number above.

Yours faithfully

Andrew B Hall
Chief Executive Officer
Heritage Western Cape

ANNEXURE B: Archaeological Impact Assessment

ANNEXURE C: Botanical Impact Assessment

ANNEXURE D: Visual Impact Assessment

ANNEXURE E: Design Guidelines and Landscaping Plan

ANNEXURE F

Assessment Criteria Used in the Evaluation of the Identified Impacts

Assessment Criteria

The following criteria have been used in the assessment of the proposed development alternatives:

Description of the impact

This refers to the nature of the impact on the resources on the site (physical impact), the nature of visual impacts, and impacts on environmental/scenic context.

Extent of impact

This refers to the geographical area of impact:

- *Local* refers to impacts to the site itself, and its immediate surrounds, such as the caravan park, Naval Radar Station site, the Wildevoelwei and suburban development around the site.
- *Sub-regional* refers to the intermediate context of the site in the Kommetjie urban area, and the larger Table Mountain National Park
- *Regional* refers to the larger context, with particular reference to relationship of the site with Kommetjie, Noordhoek and the Sun and Fish Hoek Valleys

Duration of impacts

Period used include:

- Permanent
- Long term – more than 10 years
- Medium term – 5 to 10 years
- Short term – 1- 5 years
- Temporary – e.g. during construction

Rating of impacts

- *Positive* refers to an improvement/enhance of heritage resources and significance
- *Neutral* refers to negative impacts offset by positive of impacts, or impacts that are neither positive nor negative
- *Negative* refers to impacts that will negatively affect heritage resources and cultural significance

These ratings are in turn qualified by the intensity of the impact and the ability to mitigate impacts:

- High negative refers to impacts that have a substantial impact on heritage resources and/or are difficult to mitigate or require substantial mitigation. Such measures should be monitored on a six monthly basis as part of an environmental management plan and may require additional mitigation measures until a satisfactory outcome is reached.

- Medium negative refers to impacts that are of some concern and for which mitigation measures should be measured on a yearly basis as part of an environmental management plan.
- Low negative impact refers to impacts that require no or minimal mitigation with a once-off evaluation of the effectiveness of the mitigation once completed.
- Positive refers to impacts that enhances the heritage resources and thus require no mitigation.

Significance of impacts on heritage resources

The significance of the impacts on heritage resources is measured in relation to the cultural significance of the heritage resource, with cultural significance defined as “historical, architectural, aesthetic, scientific, social, spiritual, linguistic or technological value or significance” in the NHRA.

The significance of the impact is measured as either *none, negligible, low, moderate or high*.

Confidence in the assessment

This refers to the extent of certainty with which a specific impact as been identified as well as the certainty of the impact of mitigation measures on such an impact. The degree of certainty is to a significant extent dependent on the amount of information available at the time of assessment.

Confidence in the assessment is measured as follows:

- High: 75% or greater degree of certainty
- Medium: 50% to 75% degree of certainty
- Low: 25% to 50% degree of certainty
- Minimal: none to 25% degree of certainty.

ANNEXURE G
Assessment of Alternatives

Assessment of Preferred Alternative – Alternative 3

	Description of Impacts	Extent, Rating and Duration	Significance	Informants and References	General Comments & Mitigation Recommendations	Confidence
1.	Visual impacts on the TMNP and impacts on the sense of place of TMNP	Local, sub-regional Medium-low negative Permanent With mitigation: Low	Low With mitigation: Low	Sections 8 and 9 Heritage indicators 1 & 2 Visual Impact assessment section 4.2.5.4.	<p>The bulk of the development will be shielded by Protea Ridge ridgeline from the TMNP. Small section of the development (on the north east and south eastern portions), may be visible from more elevated areas to the east of the site, but these will be seen in the context of the immediately adjacent Klein Slangkop and Riverside residential areas respectively.</p> <p><i>Mitigation measures:</i> Alternative 3 already include mitigation measures, in that the layout has been designed so that the buildings will not crest the Protea Ridge. The VIA sets out a comprehensive list of additional mitigation measures. The most important mitigation measure is worded as follows:</p> <p>The design of all the houses on the slopes of Protea Ridge must be checked to ensure that the houses are not seen from within the Table Mountain National Park floating above the ridgeline. This is particularly true for the three larger erven in the north-eastern corner of the site. For these erven it may not be possible to use the full 8m height restriction</p> <p>Impact with mitigation: Low</p>	High
2.	Visual impact on the Naval Radar Station site	Local Medium negative Permanent With mitigation: Medium-low	Low With mitigation: Low	Sections 8 & 9 VIA section 4.2.5.3	<p>From a heritage perspective, the visual impact should be seen in relation to limited contextual heritage value of the site, and the fact that it is already bounded by residential development to its south and west.</p> <p>Mitigation measures are set out in the VIA. Of relevance is the introduction of vegetative screening of fences.</p>	Medium

3.	Loss of intrinsic heritage resources on the site, viz valuable indigenous vegetation and rocky outcrops	Local, sub-regional Low negative Permanent	Low significance	Heritage indicator 3	As this layout was informed by the findings of the botanical and vertebrate fauna study, mitigation measures have been already been addressed, to the extent that this option is favoured over the No-Go option in the botanical assessment. The botanical assessment includes additional mitigation measures, addressing inter alia, controlling impacts during construction and the management of open spaces in the operational phase.	High
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Assessment of Alternative 2

	Description of Impacts	Extent, Rating and Duration	Significance	Informants and References	General Comments & Mitigation Recommendations	Confidence
1.	Visual impacts on the TMNP and impacts on the sense of place of TMNP	Local, sub-regional Medium negative Permanent With mitigation: Medium- low	Moderate With mitigation: Low	Sections 8 and 9 Heritage indicators 1 & 2 Visual Impact assessment section 4.2.5.4.	In this alternative, there is a possibility that the houses on the westerly slope of Protea Ridge may be visible from the TMNP to the east of the site. <i>Mitigation measures:</i> Revise the layout and introduce development guidelines to ensure that development does not crest the Protea Ridge. Impact with mitigation: Low	High
2.	Visual impact on the Naval Radar Station site	Local High negative Permanent With mitigation: Medium	Moderate With mitigation: Low	Section 8 & 9 VIA section 4.2.5.3	From a heritage perspective, the visual impact should be seen in relation to limited contextual heritage value of the site, and the fact that it is already bounded by residential development to its south and west. In this alternative more of site will be bounded by development (as opposed to alternative 3) Mitigation measures are set out in the VIA. Of relevance is the introduction of vegetative screening of fences, articulation of facades facing the site and control of lighting.	Medium
3.	Loss of intrinsic heritage resources on the site, viz valuable indigenous vegetation and rocky outcrops	Local, sub-regional Medium to High Negative Permanent With mitigation: Medium to low	Moderate Significance With mitigation: Low	Heritage indicator 3 Botanical Assessment section 7	The proposed mitigation measures for this option are essentially a revised layout similar to Alternative 3 as well as measures that address, inter alia, controlling impacts during construction and the management of open spaces in the operational phase as set out in the Botanical Assessment.	High

Assessment of Alternative 1

	Description of Impacts	Extent, Rating and Duration	Significance	Informants and References	General Comments & Mitigation Recommendations	Confidence
1.	Visual impacts on the TMNP and impacts on the sense of place of TMNP	Local, sub-regional Medium-high negative Permanent With mitigation: Medium	Moderate With mitigation: Moderate	Sections 8 and 9 Heritage indicators 1 & 2 Visual Impact assessment section 4.2.5.4.	According to the VIA the intensity of the visual impact on the TMNP will be high for Alternative 1 as a result of the greater footprint of the development as well as the fact that the houses rise higher up the slopes of Protea Ridge. Specifically, the houses at the north-east corner of the site adjacent to Klein Slangkop will be visible over a far greater area of the park. <i>Mitigation measures:</i> Revise the layout and introduce development guidelines to ensure that development does not crest the Protea Ridge.	High
2.	Visual impact on the Naval Radar Station site	Local High negative Permanent With mitigation: Medium-High	Moderate With mitigation: Moderate	Section 8 & 9 VIA section 4.2.5.3 Heritage indicator 4	From a heritage perspective, the visual impact should be seen in relation to limited contextual heritage value of the site, and the fact that it is already bounded by residential development to its south and west. In this alternative most of site will be bounded by development (as opposed to alternatives 2 & 3) Mitigation measures are set out in the VIA. Of relevance is the introduction of vegetative screening of fences, articulation of facades facing the site and control of lighting.	Medium
3.	Loss of intrinsic heritage resources on the site, viz valuable indigenous vegetation and rocky outcrops	Local, sub-regional High negative Permanent	High significance	Heritage indicator 3 Botanical Assessment section 7	This impact is regarded as unacceptably high by the botanical specialist. No mitigation measures were suggested.	High

Assessment of No-Go option

	Description of Impacts	Extent, Rating and Duration	Significance	Informants and References	General Comments & Mitigation Recommendations	Confidence
1.	Visual impacts on the TMNP and impacts on the sense of place of TMNP	Local Low -positive Permanent	Moderate	Sections 8 and 9 Heritage indicators 1 & 2 Visual Impact assessment section 4.2.5.4.	The assessment of this impact should be seen in the context of the potential to development the site with minimal visual impacts on the TMNP.	High
2.	Visual impact on the Naval Radar Station site	Local Neutral Permanent	Moderate	Section 8 & 9 VIA section 4.2.5.3	The assessment of this impact should be seen in the context of limited contextual heritage value of the site.	Medium
3.	Loss of intrinsic heritage resources on the site, viz valuable indigenous vegetation and rocky outcrops	Local, sub-regional Low negative Permanent	Moderate	Heritage indicator 3 Botanical Assessment section 7	The botanical impact assessment rates this impact as negative with a medium-low significance due to the possible negative impacts related to alternative uses and lack of management.	High

