

**HERITAGE IMPACT ASSESSMENT: PROPOSED SCHOOL OF SKILLS
AND PRIMARY SCHOOL ON PORTION A OF ERF 856, STRUISBAAI,
CAPE AGULHAS MUNICIPALITY, WESTERN CAPE**

(Assessment conducted under Section 38 (3) of the
National Heritage Resources Act No 25 of 1999)

Prepared for:

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May 2021

EXECUTIVE SUMMARY

Site Name:

Portion A of Erf 856

Location:

Address: Portion A of Erf 856, Sewende Laan (off the R319), Struisbaai-Noord/Molshoop, Cape Agulhas Municipality, Western Cape
Co-ordinates: S34 46 42.88, E20 01 57.40
Title Deed Number: T22694/1967

Locality Plan:



Figure: Location of the proposed development on Map sheet 3420CA-CC (2007) Bredasdorp. The proposed development (in yellow) is to the north of Struisbaai-Noord/Molshoop, on the R319 connecting Bredasdorp and Struisbaai.

Description of the Proposed Development:

Erf 856, on Sewende Laan, has been subdivided and Portion A (less than 5ha) has been rezoned for the purpose of constructing a **new Primary School** and a **new School of Skills**. The total footprint, on the southern section of the land portion, will not exceed **1ha** in extent.

Heritage Resources Identified:

After submission of the Notice of Intent to Develop (NID) by Town & Country, Heritage Western Cape responded by requesting an integrated HIA, comprising an archaeological specialist study (Appendix 2).

- **Archaeology**

An archaeological field survey on the 16th April identified three ephemeral shell scatters which were identified as being NCW (Not Conservation Worthy) (**Appendix 1**)

- **Palaeontology**

- The proposed development falls in the blue zone of the SAHRIS Palaeo Sensitivity Map – a zone of low significance. Dr J Pether has confirmed it will take place in the aeolianite coversands and no impacts are expected.

- **Built Environment**

The closest buildings to the site, which have heritage significance, are the Hotagterklip Cottages, which are 1.5km to the south. They were graded a National Monument in 1981 and are now a PHS (Grade II).

- **Cemeteries**

The new public cemetery is located some 140m to the north-east of the study area.

- **Cultural Landscape**

The coastal landscape including the Agulhas lighthouse and the southernmost tip is of high scenic significance. According to Winter & Oberholzer, it can be graded as Grade II. The fishermen cottages at Hotagterklip are a Provincial Heritage Site (PHS). However, the proposed development will take place to the north of the residential settlement of Struisbaai-Noord, a considerable distance from the coast and heritage resources. The Cultural Landscape of the area around Erf 856 is considered Low (IIIC).

Socio-economic benefits:

The development is being undertaken as a collaborative venture between the Struisbaai School of Skills, the Struisbaai Primary School and the Western Cape Government Education Department (WECD). Up to 80% of learners in Struisbaai Noord fail to matriculate because there is no high school in Struisbaai and they are obliged to take a bus to Bredasdorp. Without a matric, many young adults fail to find employment in the area. The Struisbaai SOS Funding Trust was formed in 2020. It is a Public Benefit Organization with the aim of training local people to obtain the required skills for employment in a range of trades and services in Struisbaai. At present these skills are imported from elsewhere. The school of skills and the new primary school will serve a valuable function for the community.

Anticipated Impacts on Heritage Resources:

- Archaeology: It is possible that buried archaeological sites (such as shell middens or burials) may occur beneath the surface soils, but none are visible on the surface.
- Palaeontology: Dr J Pether has confirmed that no impacts are expected.
- Built Environment: There are no buildings on the property.
- Cemeteries: There are no visible graves or cemeteries on the property.
- Cultural Landscape: The visual impact on the Cultural Landscape is expected to be low since the proposed school building and skills development school will be on vacant land adjoining the village and in keeping with the general residential nature of the area. The proposed buildings will not be visible from the PHS of Hotagterklip.

Public Participation and Comments from Conservation Bodies & Municipality:

The integrated HIA was submitted to the registered conservation bodies which included: Whale Coast Conservation and Agulhas Heritage Society as well as the Cape Agulhas Municipality (see **Appendix 4**). The Whale Coast Conservation and the Cape Agulhas Municipality have no objection to the development.

The Agulhas Heritage Society did not have any objection to the proposed development but did express concerns around the retention of the old and young milkwood trees on the property. The final position of the Primary School and School of Skills have been adjusted to retain the trees.

Recommendations:

The anticipated impacts of the proposed development on archaeological resources (as well as other heritage resources discussed mentioned above) is low. If any below ground archaeological remains such as shell middens or human burials are uncovered during earth works, the ECO should stop work in that area immediately and notify HWC.

Although a specialist palaeontological assessment was not requested by HWC, they had indicated that the Chance Fossil Finds Protocol should be implemented. Should significant fossils be found during the construction or operational phase of the cemetery expansion, the responsible ECO should safeguard them and alert Heritage Western Cape as soon as possible. This is so that appropriate action can be taken by a professional palaeontologist.

- A protocol for Chance Fossil Finds is attached as **Appendix 3**.

Therefore, there can be no objections to the authorization of the project.

Author and Date:

Integrated HIA & AIA: Dr Lita Webley, May 2021.

GLOSSARY

Archaeology: Remains resulting from human activity which is in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures.

Early Stone Age: The archaeology of the Stone Age between 2 500 000 and 200 000 years ago.

Fossil: Mineralised bones of animals, shellfish, plants and marine animals. A trace fossil is the track or footprint of a fossil animal that is preserved in stone or consolidated sediment.

Heritage: That which is inherited and forms part of the National Estate (Historical places, objects, fossils as defined by the National Heritage Resources Act 25 of 1999).

Holocene: The most recent geological time period which commenced 10 000 years ago.

Late Stone Age: The archaeology of the last 20 000 years associated with fully modern people.

Middle Stone Age: The archaeology of the Stone Age between 200 000 and 20 000 years ago associated with early modern humans.

Palaeontology: Any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trace.

SAHRA: South African Heritage Resources Agency – the compliance authority which protects national heritage in the Northern Cape.

Structure (historic:) Any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith. Protected structures are those which are over 60 years old.

ABBREVIATIONS

AIA	Archaeological Impact Assessment
BAR	Basic Assessment Report
DEA	Department of Environmental Affairs
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
ESA	Early Stone Age
EMP	Environmental Management Program
GPS	Global Positioning System
HIA	Heritage Impact Assessment
LSA	Late Stone Age
MSA	Middle Stone Age
NHRA	National Heritage Resources Act, No 25 of 1999
PIA	Palaeontological Impact Assessment
SAHRIS	South Africa Heritage Resources Information System

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Figure 9: Track paths (in blue) and waypoints are indicated. Only Point 001, 002 and 004 (in the centre of the Erf) represent ephemeral scatters of marine shell. The others are remnants of recent wooden informal dwellings which have since been demolished.

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1. INTRODUCTION

Lita Webley was instructed by Town and Country, on behalf of the Trustees of the School of Skills, to conduct a Heritage Impact Assessment (HIA) with a specialist archaeological impact assessment (AIA) for the proposed construction of a primary school and a new School of Skills on Portion A of Erf 856 in Struisbaai-Noord (Figure 1). Erf 856 is located to the east of the R319, north of Sewende Laan, west of sports fields and south of Cemetery Road and the remainder of Erf 856 (vacant), inside the proposed Urban Edge (Figure 2). The proposal did not trigger a Basic Assessment and therefore a BAR is not applicable.



Figure 1: Extract from the 1:50 000 topographic map 3420CA-CC (2007) from National Geo-Spatial Information. The location of Portion A of Erf 856 is shown in yellow (Website: www.ngi.gov.za)

2. DEVELOPMENT PROPOSAL AND LAYOUT

The proposed development will consist of a primary school and a School of Skills on the southern portion of the Erf, on a footprint not exceeding 1ha, inside the proposed Urban Edge (Figure 2 and Figure 3). The aim is to relocate and replace the existing school and to establish a new School of Skills. Negotiations are under way with the Western Cape Education Department and the request to construct a new school in Struisbaai has been approved in principle.

The proposed design of the primary school and the School of Skills is shown in Figure 3. The development will tap into the Struisbaai Spookdraai reservoirs main line to the south-west of the site. An internal road will be required to gain access from Sewendelaan and no traffic impact is expected. The site is within 500m of the centre of Struisbaai-Noord making it very accessible.

The property is well located with regards proximity to a residential area, community and public facilities. There are existing services and the development will contribute to addressing the needs of the community.

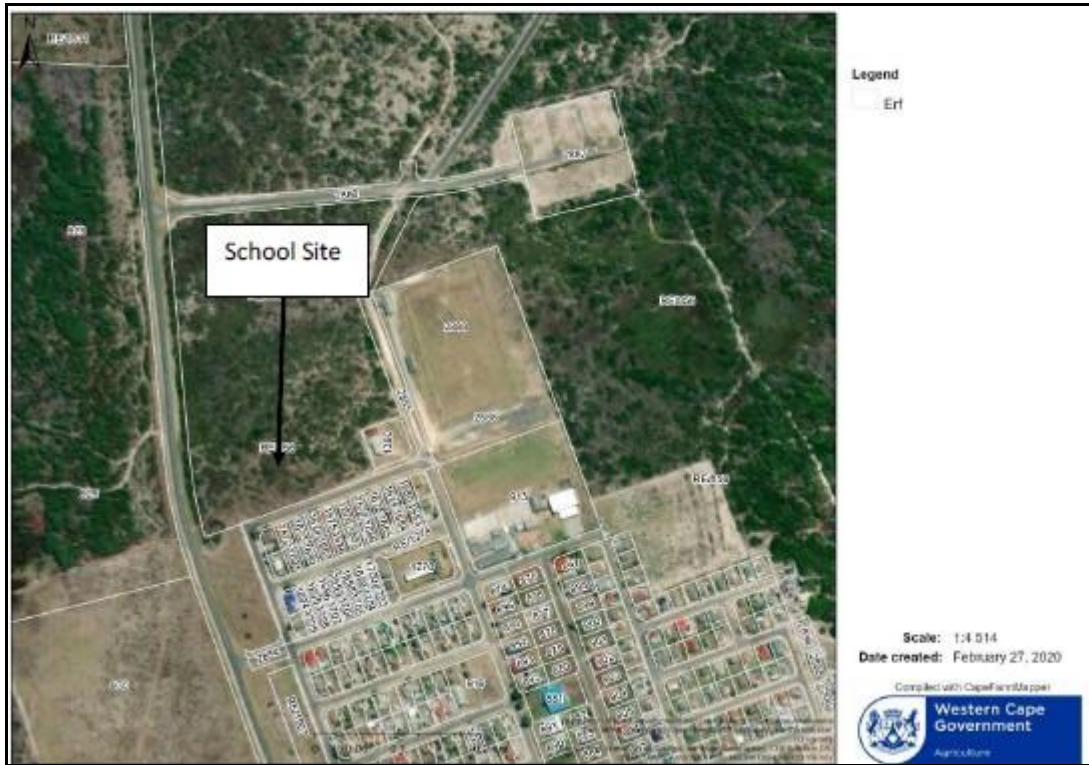


Figure 2: The location of Erf 856 with respect the R319, Struisbaai-Noord and the cemetery.



Figure 3: Schematic drawing of the new School of Skills

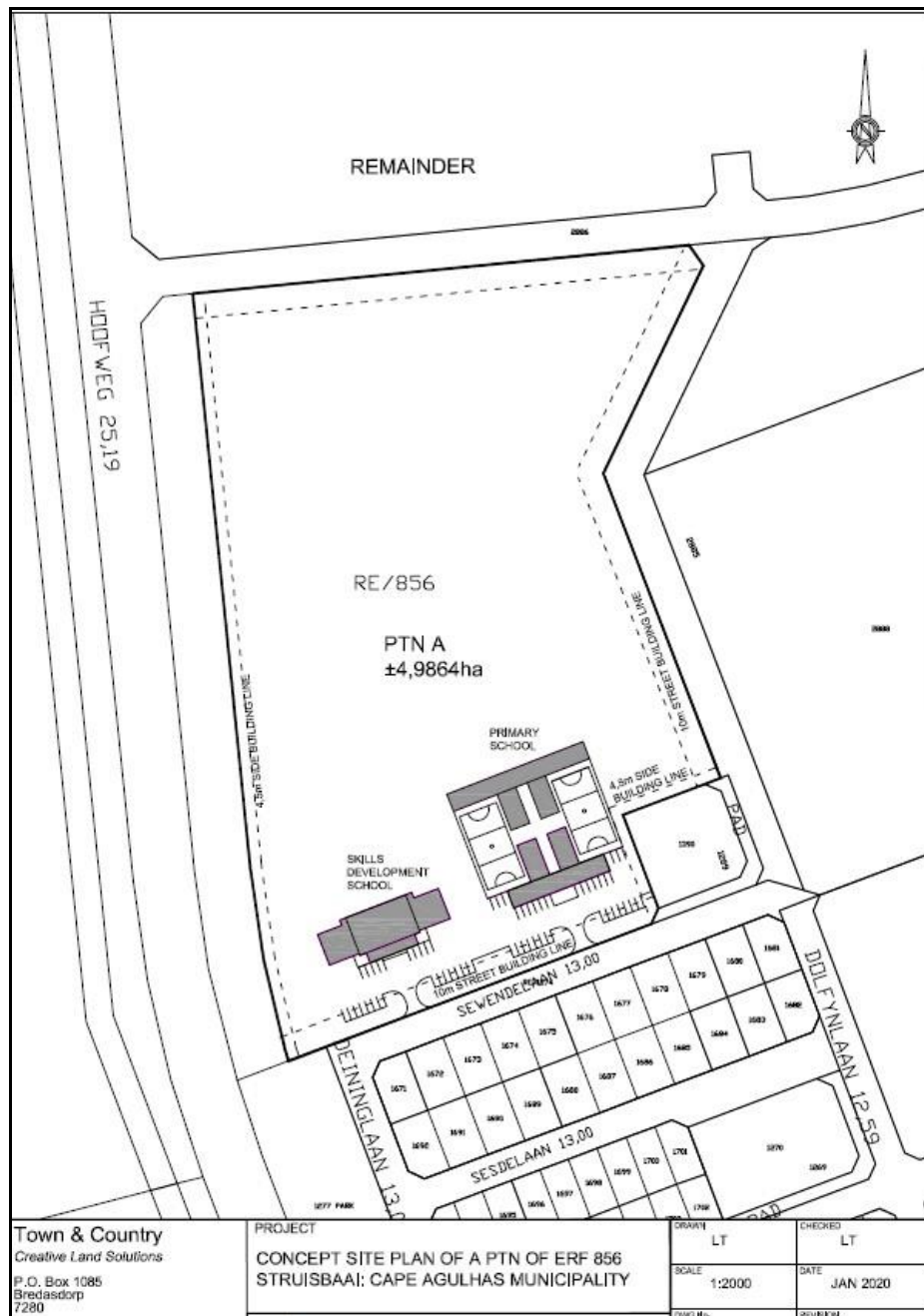


Figure 3: The location of the proposed School of Skills and the Primary School on the southern section of Portion A of Erf 856.

2.1 Zoning

Erf 856 is currently zoned as Undetermined. The portion of land for the development will be rezoned to subdivisational area, in order to provide for the civic and social use.

- A re-zoning application has been made in terms of Section 15(2) of Cape Agulhas Municipality: By-law on Municipal Land Use Planning (PG 7428 of 15 July 2015), to subdivisational area, to allow for the new erf to be zoned Civic and Social.

The subdivision of Erf 856 will create the Remainder of Erf 856, and Portion A which is 4.9864ha in size.

3. SOCIO-ECONOMIC BENEFITS

The development is being undertaken as a collaborative venture between the Struisbaai School of Skills, the Struisbaai Primary School and the Western Cape Government Education Department (WECD). Up to 80% of learners in Struisbaai Noord fail to matriculate because there is no high school in Struisbaai and they are obliged to take a bus to Bredasdorp. Without a matric, many young adults fail to find employment in the area. The Struisbaai SOS Funding Trust was formed in 2020. It is a Public Benefit Organization with the aim of training local people to obtain the required skills for employment in a range of trades and services related to the property development market in Struisbaai. At present skills are imported from elsewhere.

4. HERITAGE LEGISLATION

While the National Department of Environmental Affairs is the decision making authority acting in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA) and Regulations (2014), they must ensure that the evaluation of the statutorily defined broad range of heritage resources fulfils the requirements of the relevant heritage resources authority in terms of Section 38 (8) of the National Heritage Resources Act (Act 25 of 1999) (NHRA) and that any comments and recommendations of the relevant heritage resources authority with regard to proposed development have been taken into account prior to the granting of the consent.

The NHRA provides protection for the following categories of heritage resources:

- Landscapes, cultural or natural (Section 3 (3))
- Buildings or structures older than 60 years (Section 34);
- Archaeological Sites, palaeontological material and meteorites (Section 35);
- Burial grounds and graves (Section 36);
- Public monuments and memorials (Section 37);
- Living heritage (defined in the Act as including cultural tradition, oral history, performance, ritual, popular memory, skills and techniques, indigenous knowledge systems and the holistic approach to nature, society and social relationships) (Section 2 (d) (xxi)).

4.1 Palaeontology and Archaeology (Section 35(4))

No person may, without a permit issued by HWC, destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite. Archaeological is defined as: "material remains resulting from human activity which is in a state of disuse and is in or on land and which is older than 100 years, including artefacts, human and hominid remains and artificial features and structures". In terms of the definition, an archaeological survey therefore includes any ruined structures older than 100 years.

4.2 Burial grounds and graves (Section 36(3))

No person may, without a permit issued by the South African Heritage Resources Authority (SAHRA), destroy, damage, alter, exhume or 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.

4.3 Grading

Heritage resources are graded following the grading guidelines, "Grading: Purpose and Management Implications" as approved by Heritage Western Cape in 2016.

Table 1: Grading of Heritage Resources

Grade	Level of significance	Description
I	National	Of high intrinsic, associational and contextual heritage value within a national context, i.e. formally declared or potential Grade 1 heritage resources.
II	Provincial	Of high intrinsic, associational and contextual heritage value within a provincial context, i.e. formally declared or potential Grade 2 heritage resources.
IIIA	Local	Of high intrinsic, associational and contextual heritage value within a local context, i.e. formally declared or potential Grade IIIA heritage resources.
IIIB	Local	Of moderate to high intrinsic, associational and contextual value within a local context, i.e. potential Grade IIIB heritage resources.
IIIC	Local	Of medium to low intrinsic, associational or contextual heritage value within a national, provincial and local context, i.e. potential Grade IIIC heritage resources.
NCW		Not conservation-worthy. The Heritage Authority has applied its mind and the resourced does not have enough heritage significance to be included in the National Estate.

4.4 Response to the NID

A NID was submitted to HWC on the 17 March 2021, and they responded on the 1 April 2021, requesting an integrated HIA with specific reference to an Archaeological Impact Assessment (see attached **Appendix 2**).

5. METHODOLOGY

5.1 Purpose and Scope of Study

This report is conducted in terms of Section 38 (3) of the National Heritage Resources Act, No 25 of 1999. Dr Lita Webley was appointed to undertake the Archaeological Impact Assessment and the integrated Heritage Impact Assessment (HIA).

A survey of available literature was carried out to assess the general heritage context of the area. A background search of other Cultural Resource Management (CRM) projects in the area was made via the South African Heritage Resources Information Systems (SAHRIS) database. Unpublished reports on the oral history of Struisbaai-Noord/Molshoop were obtained from SANParks.

A field assessment was undertaken on the 16 April 2021. My tracks were recorded by means of a Garmin GPS device and all sites were digitally recorded and photographed. An attempt was made to walk transects across the property, but this was not always possible because of thickets of dense vegetation.

5.2 Assumptions and Limitations

A comprehensive coverage was not possible due to the dense vegetation in certain sections of the study area. However, these were generally in the northern part of Portion A of Erf 856, and this section will not be developed.

6. DESCRIPTION OF THE RECEIVING ENVIRONMENT

The centre point for the site is located at S34 46 42.88, E20 01 57.40

The site is generally flat and undeveloped. The sand is loose and the open patches between the vegetated areas is heavily bioturbated by dune mole activity (Plate 6). There is no evidence of vegetated dunes, drainage lines or any evidence of calcrete outcrops. The vegetation is classified as part of the South Strandveld Bioregion, with Overberg Dune Strandveld vegetation. The vegetation is generally intact although there has been an infestation of rooikrantz.

The site is vacant but has in recent years the southern section, adjoining Struisbaai been used as a dumping site and heaps of domestic rubbish are visible across the terrain (Plate 2).



Plate 1: View southward, from the study area towards Struisbaai North, indicating the dense indigenous vegetation with some encroachment of rooikrantz.



2



3

Plate 2: Dumping of waste, including old washing machines, computers and mattresses.

Plate 3: There are at least 2 locations where informal dwellings have been demolished and building materials remain.



Plate 4: View in south-easterly direction, from the R319, toward the study area, indicated by the arrow. With the houses of Struisbaai-Noord behind the vegetation in the distance. Note the powerlines running in the foreground. This powerline route was assessed by Avery (2004).

7. HERITAGE BACKGROUND

7.1 Palaeontology

The site lies partly in the blue and partly in the grey portion of the SAHRIS palaeo sensitivity map (Figure 5). Dr John Pether had the following to say: the site is on coversands overlying weathered limestones is of low palaeontological sensitivity” (12 April 2021). HWC have only requested that the Fossil Finds Protocol is implemented.

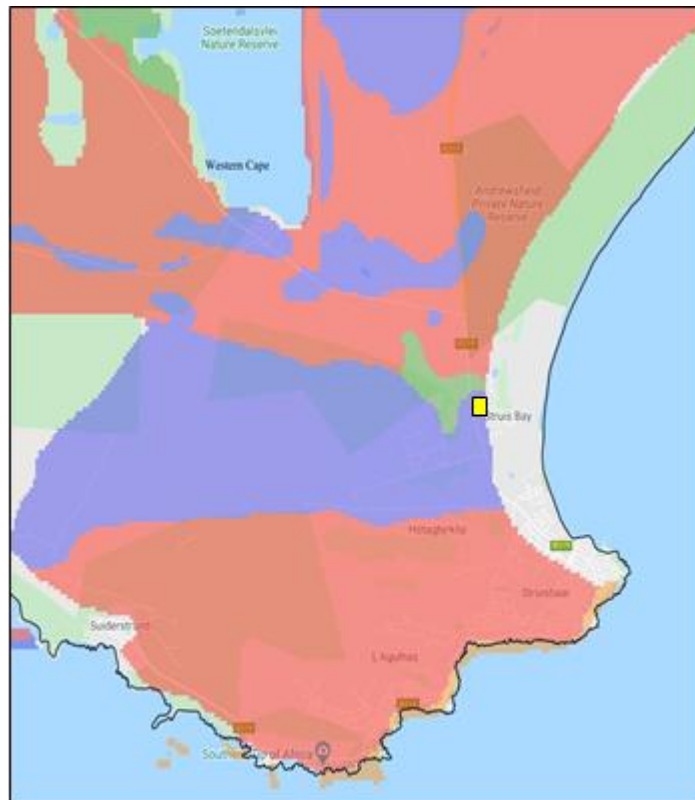


Figure 5: The location of Erf 856 on the Agulhas plain

7.2 Pre-Colonial Archaeology

The study area is approximately 1km from the coast, which is a sandy beach with no rocky outcrops. Although white mussels (*Donax serra*) would have been available for collection by

Holocene hunter-gatherers, they would have had to walk a considerable distance to get to the closest rocky shores.

A number of archaeological surveys have been conducted in and around Struisbaai and some are indicated on Figure 6.

In 1995, the Archaeology Contracts Office undertook a first phase archaeological assessment of Erven 922 and 940 in Struisbaai (Halkett & Hart 1995a) (Figure 6). The area in question (now known as Argonauta Park) lies to the south-east of Erf 856. Only two archaeological sites were recorded during the survey. No evidence of any archaeological material could be found on the coastal dunes. The inland limestone flats (although presently heavily vegetated) had been subjected to extensive earthmoving and quarrying activities destroying any archaeological material that may have existed. The one site consisted of various refuse middens associated with the historic settlement at Hotagterklip. Material was exposed on the top of the high vegetated dune in two places and consisted of large quantities of *Donax serra* (white mussel), large amounts of fish bone etc. Artefactual material consisted of ceramic sherds (mostly refined earthenwares ranging from early-mid 19th to 20th century) and glass bottle fragments. The sites were considered to have high significance in terms of material culture of 19th and early 20th century working class people.

The remainder of the midden that lay on Erf 853 was later mitigated at the instruction of the old National Monuments Council (Halkett & Hart 1996). The other site was an ephemeral scatter of shellfish lying next to a path in a densely vegetated area on the inland calcrete flats. Shellfish species consisted of highly fragmented *Oxystele* sp, *Turbo sarmaticus* and *Cymbula granatina* (mixed with fragments of raised beach). Some quartzite manuports were present. The significance was considered to be Low and no mitigation was requested.

Another survey of Portions 7 and 8 of Farm 280, Zoetendalsvlei, to the north east of Erf 856 was undertaken in 1995 (Halkett & Hart 1995b). In all, 15 archaeological sites were identified with the following observations: "The lack of rocky headlands along the coastal frontage has greatly reduced the possibility of there being large numbers of archaeological sites in this area". The distribution of the located sites shows that there was a preference for occupation of the deflated areas between the dunes. The artefactual material suggests an occupation of this area for at least the last 6000 years. One or two occurrences indicate much older occupation possibly as far back as 80 000 years (Middle Stone Age).

Another project relevant to the area under discussion was undertaken by Kaplan in 2008. He conducted a Phase 1 Archaeological Impact Assessment of the proposed new waterborne sewage system for the holiday towns of Struisbaai and Cape Agulhas. He identified 4 archaeological shell middens and one historic feature along the coast between Struisbaai and Agulhas. It is not clear if these civil works were ever undertaken, and if the recommendations were carried out. No mitigation report can however be found on the SAHRIS database.

In 2012, Webley *et al* assessed the proposed positions for a small number of wind turbines some 3km west of Erf 856 inland of the R319. The topography of the wind energy facility clearly indicated that it was located in an area of old mobile dunes. A total of 14 archaeological sites were recorded which, with the exception of one, consisted of ephemeral fragmented shell exposures on the edges of dunes. As the wind energy project was never finalised, no mitigation has ever been undertaken.

In 2014, Halkett undertook a survey of Erf 857, which is to the south of the study area and west of the R319. There was generally little archaeological material on the site, some occasional marine shell and a few LSA stone tools were noted in a disturbed area along the R319, but he did not consider the sites significant and recommended that they be graded as NCW. The development does not appear to have taken place.

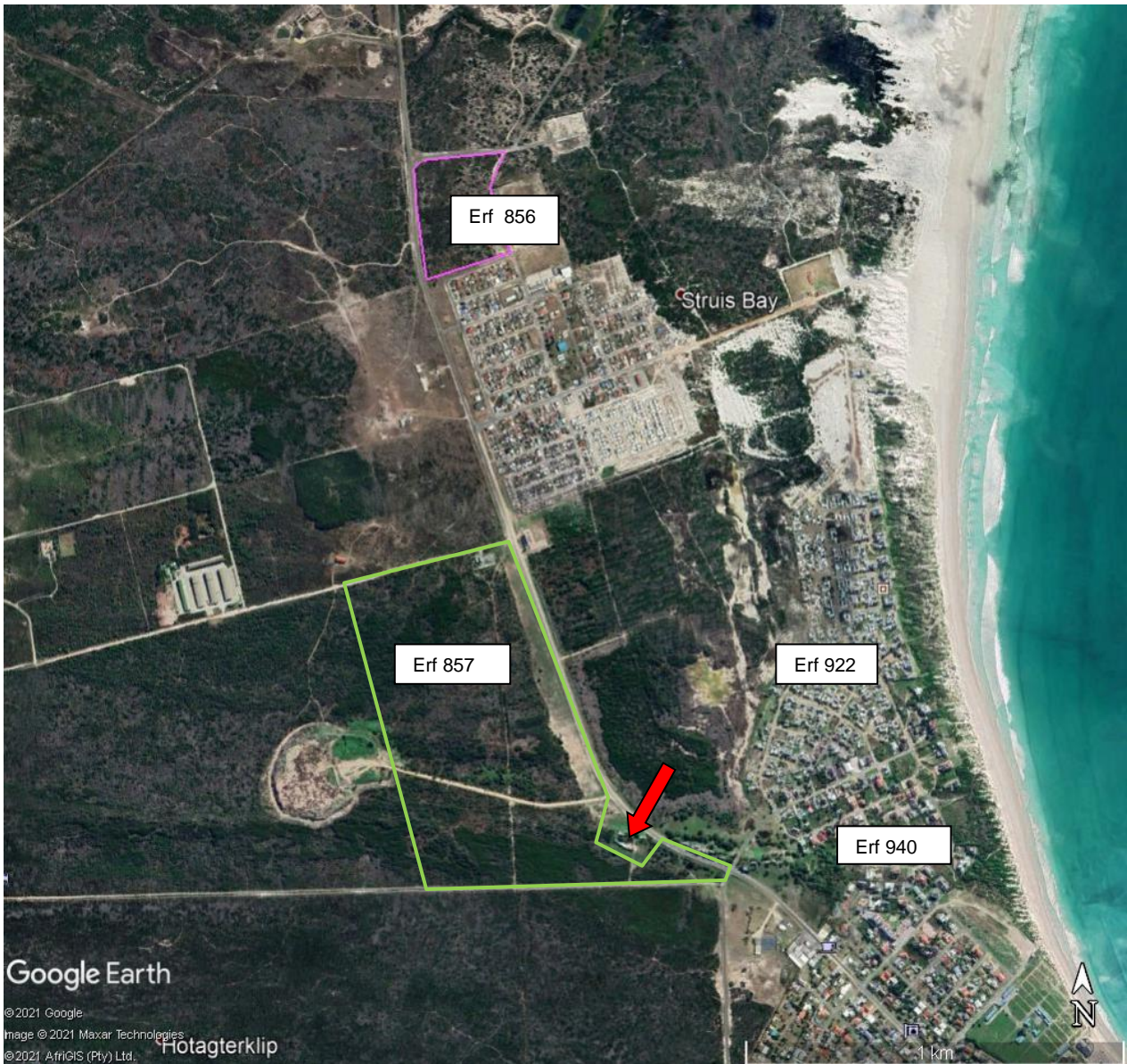


Figure 6: The study area, Erf 856 (in pink) is 1.5km from the coast. Erf 857, which was surveyed by Halkett in 2014 is outlined in green, while Erven 922 and 940 (no site boundaries provided) were surveyed by the Archaeology Contracts Office in 1995. The red arrow points to the PHS site (the Hotagterklip cottages) which are located on Portion 1 of Erf 857.

7.3 Historical Background and Built Environment

Bartolomeu Dias is reported to have anchored at Aguada de Sao Jorge (present day Struisbaai) in 1488 <https://everitt-capeagulhas.co.za/cape-agulhas-rich-history> although the exact location is clearly difficult to pinpoint. Fransen (2006) provides no information on Struisbaai but notes that the history of Bredasdorp dates back to 1833. The earliest references to the farm with the name Struys Bay dates to 1845. Archival records make refer to “fishery rights” to Struys Bay from 1898 and records dating back to 1913 have reference to a fishing station at ‘Struys Bay’. Farmers were applying for licences to construct fish kraals or ‘vis vyvers’ at Struisbaai from this time. The inhabitants of Struisbaai-Noord/Molshoop are descendants of a small-scale, traditional fishing community (Parker 2013) who have a historical dependence of harvesting marine resources. At one stage, some lived close to the fishing harbour (which dates to 1959) and others in and around Hotagterklip according to the oral history compiled by the Agulhas National Park (2011). They were forcibly removed during the 1960s and settled in the houses constructed at Struisbaai-Noord/Molshoop.

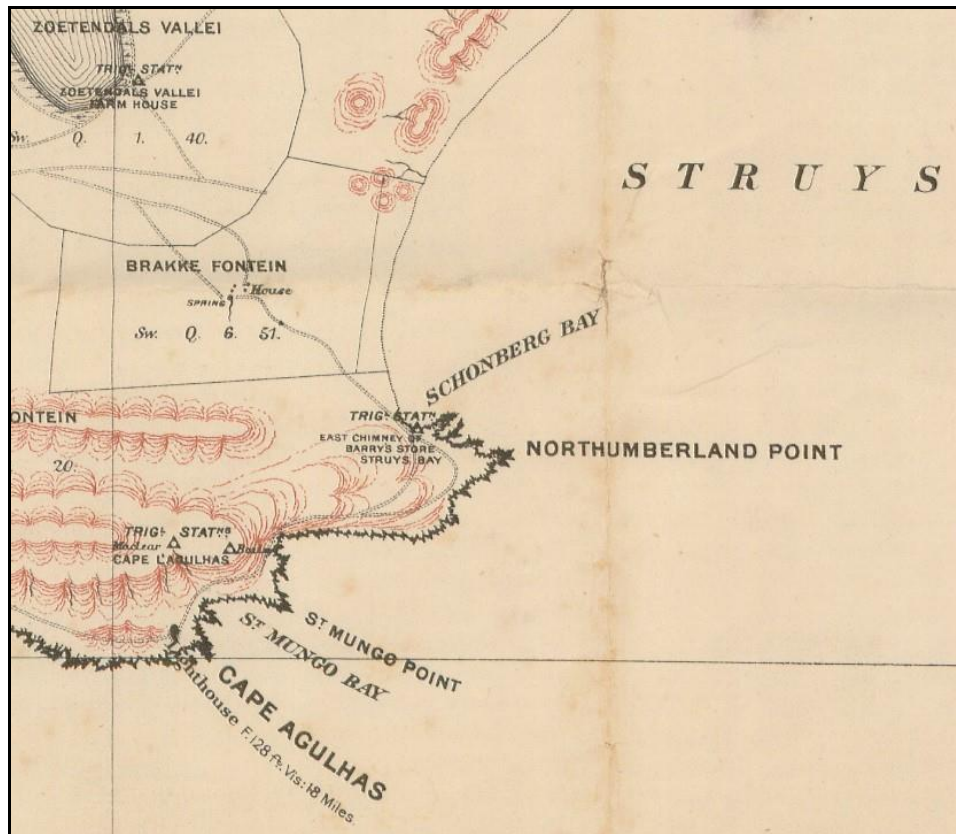


Figure 7: Extract from the Bredasdorp (Southern Districts) map of 1880-1890, showing the hamlet of ‘Struys Bay’ and the location of Barry’s Store approximately on the location of the calcrete ridge (where the Hotagterklip cottages are located today).



Figure 8: Aerial photograph from 1940, showing the undeveloped nature of the landscape around Struisbaai (Agulhas National Park 2011).

Some 1.5km to the south of Erf 856, is the Fishermen’s Cottages of Hotagterklip, which were declared a National Monument (now a Provincial Monument) on the 10 April 1981 (Government Gazette No 7541). According to the declaration: “This property consists of nine fishermen’s

cottages which are worthy of preservation in terms of architectural and historical considerations". The name of the settlement is believed to mean "towards the left behind the rock" and is an idiomatic Afrikaans expression meaning to have a tough time. The oral history of the fishing community at Hotagterklip has been collected and compiled by the Agulhas National Park (2011) and is available.



Plate 5 : Restored fishermen cottages at Hotagterklip which are now used for tourist information purposes. They are a PHS (Grade II).

7.4 Cemeteries

The new cemetery is located to the north of Struisbaai-Noord, with the older cemetery situated in the village. The new cemetery is 140m to the east of the northern extent of Erf 856. There is no evidence of graves or informal burials taking place on Erf 856. However, the possibility of unmarked, pre-colonial graves on the Erf cannot be ruled out.

7.5 Cultural Landscape

According to the inventory of the Heritage and Scenic Resources of the Western Cape (Winter & Oberholzer 2014), the landscape around the Agulhas Plain, and particularly the Agulhas National Park, is considered of high scenic, biodiversity and cultural value. The coastline includes the Agulhas Lighthouse (1849), numerous shipwrecks off the coast, the tidal fish traps which date to the early 20th century and geographical locations such as the southernmost point of Africa. This landscape has been graded as Grade I or II.

These heritage resources are all however, some distance from the study area. The closest heritage resource to the Erf is the Hotagterklip Fisherman cottages which are further described above in 7.3. Mention must be made of the living heritage related to the strong connection which many residents have to the sea and fishing, with many residents third generation fishermen with close ties to the area.

The cultural landscape to the north of Struisbaai-Noord is considered to be low (IIIC).

8. RESULTS

8.1 Archaeological Survey

The survey was undertaken on the 16th April 2021. Sections of the veld was impenetrable, and it was not possible to undertake regular transects. Where the surface soil was open and clear of vegetation, it was examined closely for any signs of archaeological material. The sandy, open areas were heavily bioturbated by mole hills and it is possible that material has been moved. The

survey was concentrated on the southern section of Portion A of Erf 856, as this is the area which has been selected for development. The northern part of the Erf will remain undeveloped, natural veld (Figure 3).



Figure 9: Track paths (in blue) and waypoints are indicated. Only Point 001, 002 and 004 (in the centre of the Erf) represent ephemeral scatters of marine shell. The others are remnants of recent wooden informal dwellings which have since been demolished.

Table 2: List of sites recorded.

Site Name	Co-ordinates	Description	Grading	Mitigation
001	34°46'43.83"S 20° 1'58.82"E	Ephemeral scatter of marine shell, including <i>Turbo</i> sp, <i>Oxystele</i> sp shells and 1 quartz chunk over an area of 4 square metres in an area of dune mole activity	NCW	None
002	34°46'42.04"S 20° 1'57.77"E	Ephemeral, small fragments of <i>Oxystele</i> sp shells in a heavily bioturbated area.	NCW	None
003	34°46'43.75"S 20° 1'56.28"E	Remnants of an informal pole and corrugated iron structure (21 st century), demolished and only the sub-structure remaining.	NCW	None
004	34°46'43.49"S 20° 1'57.60"E	Fragments of <i>Haliotis</i> sp, 1 <i>Scutellastra longicosta</i> and 1 <i>Oxystele</i> sp. in a sandy patch, bioturbated by dune mile activity.	NCW	None
005	34°46'45.85"S 20° 1'58.82"E	Remnants of an informal pole and corrugated iron structure (21 st century), demolished and only the sub-structure remaining.	NCW	None

The most significant problem with identifying possible shell midden sites, was the occurrence of more recent dumping of marine shell on the site. In one case, a black back was recovered which contained a large number of abalone (*Haliotis* sp) shells. Clearly, both legal and illegal harvesting

of marine shell from the adjoining coast is being dumped on the property. Further, it is likely that the people who lived in the informal dwellings would also have harvested marine resources.



Plate 6: Showing the open patches of soil between the dense vegetation which had been turned over by dune moles.



Plate 7: Site 001, indicating the ephemeral shell distribution which was recorded outside of the development footprint.

9. IMPACT IDENTIFICATION AND ASSESSMENT

9.1 Palaeontology

The nature of the development means that no deep excavations will be required. All development will take place in the surface coversands and no impacts are expected. However, HWC has recommended that the Fossil Chance Finds Protocol is implemented (Appendix 2).

9.2 Archaeology

The potential for the proposed development to impact above ground heritage resources is very low.

With respect the potential for significant archaeological remains to be uncovered, Halkett (2014) noted with respect Erf 857 (on the opposite side of the road): “While looking back over previous archaeological assessments from the area, we have noted the overall paucity of archaeological sites inland of the coast that were not originally part of active dune systems. It may be that this relates primarily to the fact that vegetation in stable soil areas may simply have been too thick for easy access, and hence occupation was focussed elsewhere. Proximity to water and shellfish and other coastal food resources would also have been likely considerations” (2014: 9).

This HIA report supports earlier conclusions. It is possible, although not probable, that there may be below ground archaeological remains such as shell middens or human burials. If these are uncovered, the responsible Environmental Control Officer should immediately stop work in that area and notify HWC.

Table 3: Potential Impacts to Archaeological Resources

Nature of Impact: Destruction of above and below ground archaeological resources, including pre-colonial graves		
	Without Mitigation	With Mitigation
Extent	Local (1)	1
Duration	Permanent (5)	5
Magnitude	Minor (2)	1
Probability	Improbable (2)	1
Significance	Low (16)	7
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	N/A	N/A
Mitigation: None. If any archaeological remains are uncovered during earthworks, the ECO must contact HWC immediately		
Cumulative Impacts: Negligible		
Residual Impacts: None		

9.3 Built Environment and Cemeteries

No impacts are expected to the Built Environment. The PHS cottages of Hotagterklip are some 1.5km to the south of the proposed development and the new primary school and school of skills will not be visible.

There will be no impacts to the new cemetery to the north-east of the Erf. The developments are on the southern portion of the Erf, and they will be separated from the cemetery by thick vegetation.

9.4 Cultural Landscape

Although the cultural landscape further to the south, around Agulhas is considered to be of high significance, the impacts of the proposed developments will not be visible. The residential development of Struisbaai-Noord/Molshoop dates to the 1960s and later, and the proposed development of a primary school and skills school will fit in with the built environment.

9.5 Consultation

In their response to the NID submission (18 August 2020), HWC requested an integrated HIA and *“The commends of relevant registered conservation bodies, all Interested and Affected Parties, and the relevant Municipality must be requested and included in the HIA where provided. Proof of these requests must be submitted”*.

The subdivision and the rezoning of the property triggered a Public Participation Process and the results of this are attached.

The integrated HIA was submitted to the registered conservation bodies which included: Whale Coast Conservation and Agulhas Heritage Society as well as the Cape Agulhas Municipality (see **Appendix 4**). The Whale Coast Conservation and the Cape Agulhas Municipality have no objection to the development.

The Agulhas Heritage Society did not have any objection to the proposed development but did express concerns around the retention of the old and young milkwood trees on the property. The final position of the Primary School and School of Skills have been adjusted to retain the trees.

10. RECOMMENDATIONS

The anticipated impacts of the proposed development on archaeological resources (as well as other heritage resources discussed mentioned above) is Low. If any below ground archaeological remains such as shell middens or human burials are uncovered during earth works, the ECO should stop work in that area immediately and notify HWC.

Although a specialist palaeontological assessment was not requested by HWC, they had indicated that the Chance Fossil Finds Protocol should be implemented. Should significant fossils be found during the construction or operational phase of the cemetery expansion, the responsible ECO should safeguard them and alert Heritage Western Cape as soon as possible. This is so that appropriate action can be taken by a professional palaeontologist. Mitigation could include scientific recording and sampling, or collection of fossil material as well as that of associated geological data.

- A protocol for Chance Fossil Finds is attached as **Appendix 3**.

Therefore, there can be no objections to the authorization of the project.

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Agulhas National Park. 2011. *Hotagterklip: 'n onvertelde geskiedenis*. Mondelinge geskiedenisprojek (oral history) befonds deur Suid-Afrikaanse Nasionale Parke. Onderhoude gevoer en inligting ingesamel deur Melani Joumat. Tikwerk en uitleg deur Jessica Engel.

APPENDIX 1

ARCHAEOLOGICAL IMPACT ASSESSMENT: PROPOSED SCHOOL OF SKILLS AND PRIMARY SCHOOL ON PORTION A OF ERF 856, STRUISBAAI, CAPE AGULHAS MUNICIPALITY, WESTERN CAPE

(Assessment conducted under Section 38 (3) of the
National Heritage Resources Act No 25 of 1999)

Prepared for:

Louna Truter
Town & Country
Professional Land Survey and Town Planning
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Francois de Bruyn
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Prepared by:

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May 2021

EXECUTIVE SUMMARY

Site Name:

Portion A of Erf 856

Location:

Address: Portion A of Erf 856, Sewende Laan (off the R319), Struisbaai-Noord/Molshoop, Cape Agulhas Municipality, Western Cape

Co-ordinates: S34 46 42.88, E20 01 57.40

Title Deed Number: T22694/1967

Locality Plan:



Figure: Location of the proposed development on Map sheet 3420CA-CC (2007) Bredasdorp. The proposed development (in yellow) is to the north of Struisbaai-Noord/Molshoop, on the R319 connecting Bredasdorp and Struisbaai.

Description of the Proposed Development:

Erf 856, on Sewende Laan, has been subdivided and Portion A (less than 5ha) has been rezoned for the purpose of constructing a **new Primary School** and a **new School of Skills**. The total footprint, on the southern section of the land portion, will not exceed **1ha** in extent.

Heritage Resources Identified:

After submission of the Notice of Intent to Develop (NID) by Town & Country, Heritage Western Cape responded by requesting an integrated HIA, comprising an archaeological specialist study (Appendix 1).

- **Archaeology**

An archaeological field survey on the 16th April 2021 identified three ephemeral shell scatters which were identified as being NCW (Not Conservation Worthy).

Socio-economic benefits:

The development is being undertaken as a collaborative venture between the Struisbaai School of Skills, the Struisbaai Primary School and the Western Cape Government Education Department (WECD). Up to 80% of learners in Struisbaai Noord fail to matriculate because there is no high school in Struisbaai and they are obliged to take a bus to Bredasdorp. Without a matric, many young adults fail to find employment in the area. The Struisbaai SOS Funding Trust was formed in 2020. It is a Public Benefit Organization with the aim of training local people to obtain the required skills for employment in a range of trades and services in Struisbaai. At present these skills are imported from elsewhere. The school of skills and the new primary school will serve a valuable function for the community.

Anticipated Impacts on Heritage Resources:

- Archaeology: It is possible that buried archaeological sites (such as shell middens or burials) may occur beneath the surface soils, but none are visible on the surface.

Public Participation and Comments from Conservation Bodies & Municipality:

The integrated HIA was submitted to the registered conservation bodies which included: Whale Coast Conservation and Agulhas Heritage Society as well as the Cape Agulhas Municipality (see **Appendix 4**). The Whale Coast Conservation had no objection to the development.

The Agulhas Heritage Society did not have any objection to the proposed development but did express concerns around the retention of the old and young milkwood trees on the property. The final position of the Primary School and School of Skills have been adjusted to retain the trees.

Recommendations:

The anticipated impacts of the proposed development on archaeological resources is low. If any below ground archaeological remains such as shell middens or human burials are uncovered during earth works, the ECO should stop work in that area immediately and notify HWC.

Author and Date:

Archaeological Impact Assessment: Dr Lita Webley, April 2021.

SPECIALIST DECLARATION

I, Lita Webley (PhD in Archaeology, University of Cape Town), herewith confirm that I am a member of the Association of Southern African Professional Archaeologists (ASAPA: Membership No 175). I am an accredited Principal Investigator Stone Age archaeology, Shell Midden Archaeology and Colonial Archaeology and Field Director for Grave Relocation. I am a member of the Association of Professional Heritage Practitioners. I have worked as a heritage practitioner since 1997 and have completed more than 250 archaeological and heritage impact assessments.

As the appointed independent specialist for this application declare that I –

- act as an independent specialist (archaeologist) in this application.
- regard the information contained in this report as it relates to my specialist input/study to be true and correct.
- do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the NEMA, the Environmental Impact Assessment Regulations, 2014 and any specific environmental management Act.
- have and will not have no vested interest in the proposed activity proceeding.
- have disclosed, to the applicant, EAP and competent authority, any material information that have or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the NEMA, the Environmental Impact Assessment Regulations, 2014 and any specific environmental management Act;
- am fully aware of and meet the responsibilities in terms of NEMA, the Environmental Impact Assessment Regulations, 2014 (specifically in terms of regulation 13 of GN No.R. 982) and any specific environmental management Act, and that failure to comply with these requirements may constitute and result in disqualification;
- am aware that a false declaration is an offense in terms of regulation 48 of GN No. R. 982.



Signature of the specialist

Name of company: Dr Lita Webley
Professional Archaeologist and Specialist Heritage Practitioner

Date: May 2021

GLOSSARY

Archaeology: Remains resulting from human activity which is in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures.

Early Stone Age: The archaeology of the Stone Age between 2 500 000 and 200 000 years ago.

Fossil: Mineralised bones of animals, shellfish, plants and marine animals. A trace fossil is the track or footprint of a fossil animal that is preserved in stone or consolidated sediment.

Heritage: That which is inherited and forms part of the National Estate (Historical places, objects, fossils as defined by the National Heritage Resources Act 25 of 1999).

Holocene: The most recent geological time period which commenced 10 000 years ago.

Late Stone Age: The archaeology of the last 20 000 years associated with fully modern people.

Middle Stone Age: The archaeology of the Stone Age between 200 000 and 20 000 years ago associated with early modern humans.

Palaeontology: Any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trace.

SAHRA: South African Heritage Resources Agency – the compliance authority which protects national heritage in the Northern Cape.

Structure (historic:) Any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith. Protected structures are those which are over 60 years old.

ABBREVIATIONS

AIA	Archaeological Impact Assessment
BAR	Basic Assessment Report
DEA	Department of Environmental Affairs
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
ESA	Early Stone Age
EMP	Environmental Management Program
GPS	Global Positioning System
HIA	Heritage Impact Assessment
LSA	Late Stone Age
MSA	Middle Stone Age
NHRA	National Heritage Resources Act, No 25 of 1999
PIA	Palaeontological Impact Assessment
SAHRIS	South Africa Heritage Resources Information System

1. INTRODUCTION

Lita Webley was instructed by Town and Country, on behalf of the Trustees of the School of Skills, to conduct a Heritage Impact Assessment (HIA) with a specialist archaeological impact assessment (AIA) for the proposed construction of a primary school and a new School of Skills on Portion A of Erf 856 in Struisbaai-Noord (Figure 1). Erf 856 is located to the east of the R319, north of Sewende Laan, west of sports fields and south of Cemetery Road and the remainder of Erf 856 (vacant), inside the proposed Urban Edge (Figure 2). The proposal did not trigger a Basic Assessment and therefore a BAR is not applicable.



Figure 1: Extract from the 1:50 000 topographic map 3420CA-CC (2007) from National Geo-Spatial Information. The location of Portion A of Erf 856 is shown in yellow (Website: www.ngi.gov.za)

2. DEVELOPMENT PROPOSAL AND LAYOUT

The proposed development will consist of a primary school and a School of Skills on the southern portion of the Erf, on a footprint not exceeding 1ha, inside the proposed Urban Edge (Figure 2 and Figure 3). The aim is to relocate and replace the existing school and to establish a new School of Skills. Negotiations are under way with the Western Cape Education Department and the request to construct a new school in Struisbaai has been approved in principle.

The proposed design of the primary school and the School of Skills is shown in Figure 3. The development will tap into the Struisbaai Spookdraai reservoirs main line to the south-west of the site. An internal road will be required to gain access from Sewendelaan and no traffic impact is expected. The site is within 500m of the centre of Struisbaai-Noord making it very accessible.

The property is well located with regards proximity to a residential area, community and public facilities. There are existing services and the development will contribute to addressing the needs of the community.

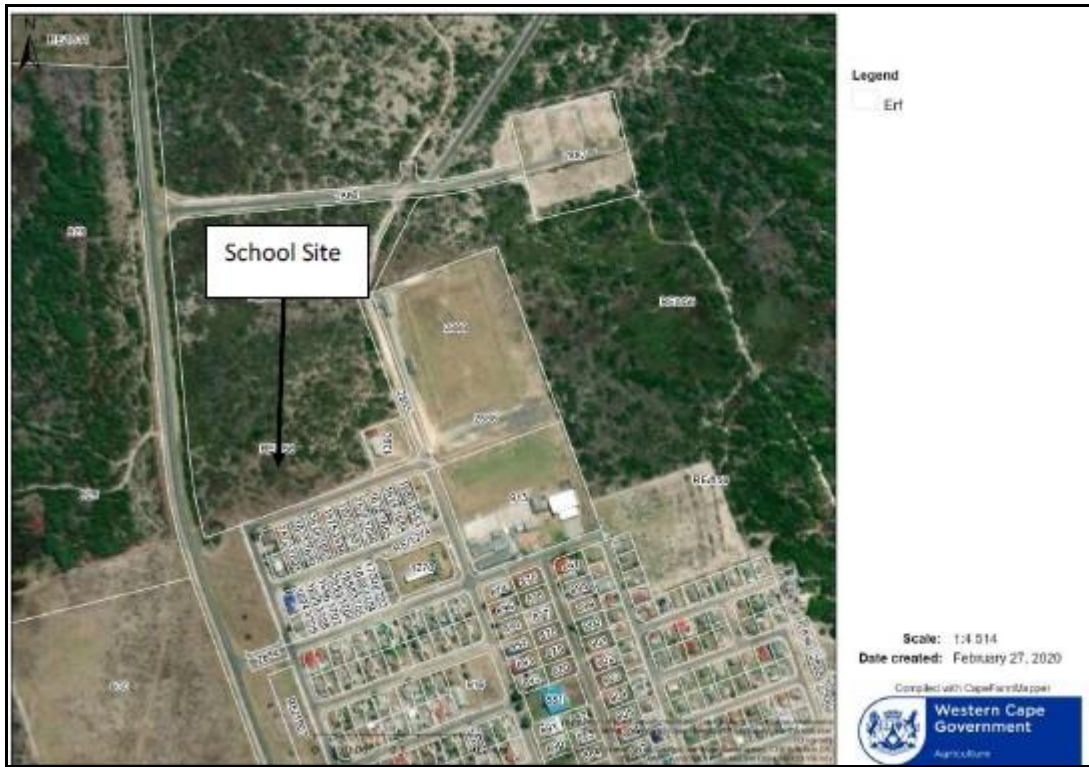


Figure 2: The location of Erf 856 with respect the R319, Struisbaai-Noord and the cemetery.



Figure 3: Schematic drawing of the new School of Skills

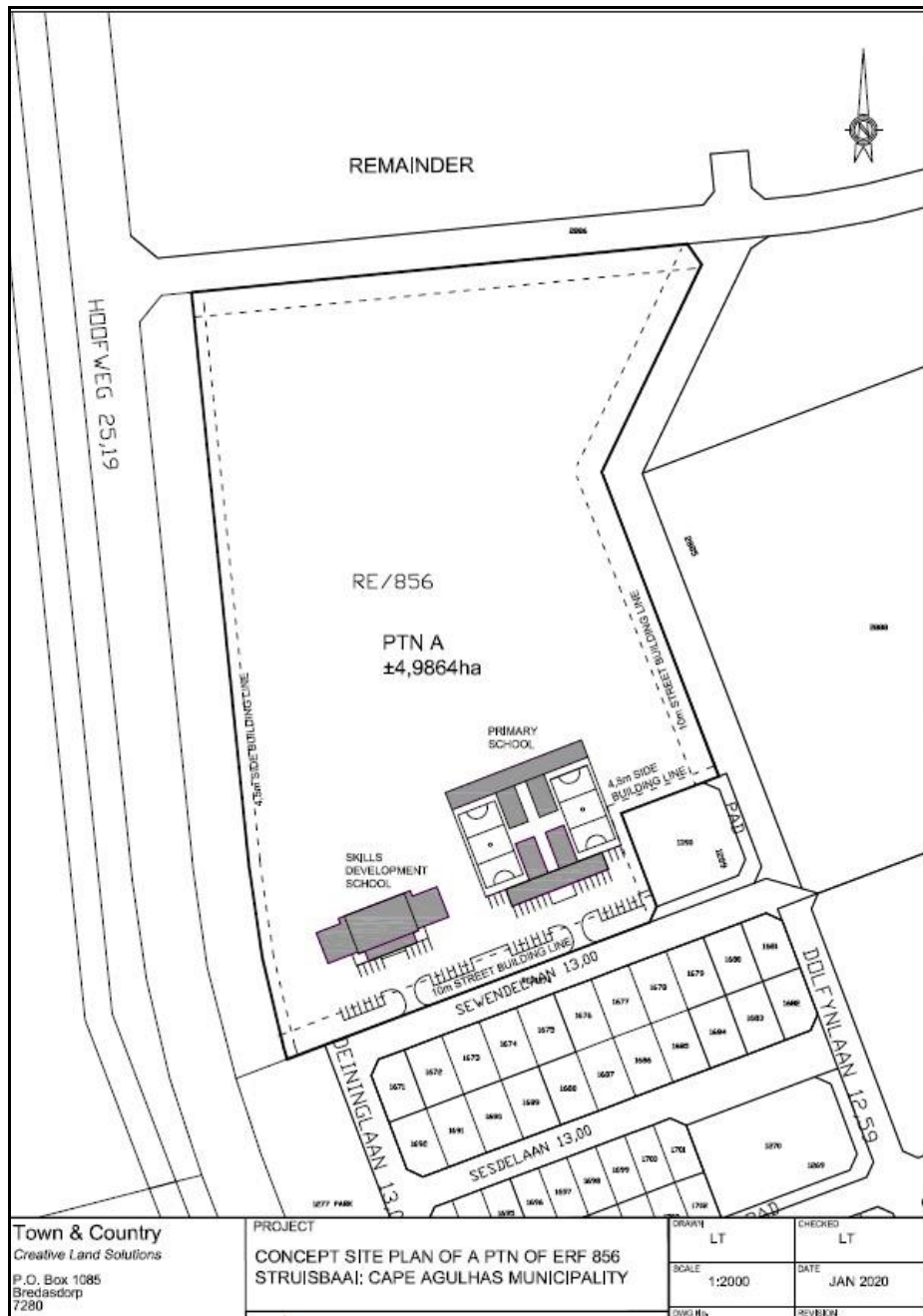


Figure 3: The location of the proposed School of Skills and the Primary School on the southern section of Portion A of Erf 856.

2.1 Zoning

Erf 856 is currently zoned as Undetermined. The portion of land for the development will be rezoned to subdivisational area, in order to provide for the civic and social use.

- A re-zoning application has been made in terms of Section 15(2) of Cape Agulhas Municipality: By-law on Municipal Land Use Planning (PG 7428 of 15 July 2015), to subdivisational area, to allow for the new erf to be zoned Civic and Social.

The subdivision of Erf 856 will create the Remainder of Erf 856, and Portion A which is 4.9864ha in size.

3. SOCIO-ECONOMIC BENEFITS

The development is being undertaken as a collaborative venture between the Struisbaai School of Skills, the Struisbaai Primary School and the Western Cape Government Education Department (WECD). Up to 80% of learners in Struisbaai Noord fail to matriculate because there is no high school in Struisbaai and they are obliged to take a bus to Bredasdorp. Without a matric, many young adults fail to find employment in the area. The Struisbaai SOS Funding Trust was formed in 2020. It is a Public Benefit Organization with the aim of training local people to obtain the required skills for employment in a range of trades and services related to the property development market in Struisbaai. At present skills are imported from elsewhere.

4. HERITAGE LEGISLATION

While the National Department of Environmental Affairs is the decision making authority acting in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA) and Regulations (2014), they must ensure that the evaluation of the statutorily defined broad range of heritage resources fulfils the requirements of the relevant heritage resources authority in terms of Section 38 (8) of the National Heritage Resources Act (Act 25 of 1999) (NHRA) and that any comments and recommendations of the relevant heritage resources authority with regard to proposed development have been taken into account prior to the granting of the consent.

The NHRA provides protection for the following categories of heritage resources:

- Landscapes, cultural or natural (Section 3 (3))
- Buildings or structures older than 60 years (Section 34);
- Archaeological Sites, palaeontological material and meteorites (Section 35);
- Burial grounds and graves (Section 36);
- Public monuments and memorials (Section 37);
- Living heritage (defined in the Act as including cultural tradition, oral history, performance, ritual, popular memory, skills and techniques, indigenous knowledge systems and the holistic approach to nature, society and social relationships) (Section 2 (d) (xxi)).

4.1 Palaeontology and Archaeology (Section 35(4))

No person may, without a permit issued by HWC, destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite. Archaeological is defined as: "material remains resulting from human activity which is in a state of disuse and is in or on land and which is older than 100 years, including artefacts, human and hominid remains and artificial features and structures". In terms of the definition, an archaeological survey therefore includes any ruined structures older than 100 years.

4.2 Burial grounds and graves (Section 36(3))

No person may, without a permit issued by the South African Heritage Resources Authority (SAHRA), destroy, damage, alter, exhume or 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.

4.3 Grading

Heritage resources are graded following the grading guidelines, “Grading: Purpose and Management Implications” as approved by Heritage Western Cape in 2016.

Table 1: Grading of Heritage Resources

Grade	Level of significance	Description
I	National	Of high intrinsic, associational and contextual heritage value within a national context, i.e. formally declared or potential Grade 1 heritage resources.
II	Provincial	Of high intrinsic, associational and contextual heritage value within a provincial context, i.e. formally declared or potential Grade 2 heritage resources.
IIIA	Local	Of high intrinsic, associational and contextual heritage value within a local context, i.e. formally declared or potential Grade IIIA heritage resources.
IIIB	Local	Of moderate to high intrinsic, associational and contextual value within a local context, i.e. potential Grade IIIB heritage resources.
IIIC	Local	Of medium to low intrinsic, associational or contextual heritage value within a national, provincial and local context, i.e. potential Grade IIIC heritage resources.
NCW		Not conservation-worthy. The Heritage Authority has applied its mind and the resourced does not have enough heritage significance to be included in the National Estate.

4.4 Response to the NID

A NID was submitted to HWC on the 17 March 2021, and they responded on the 1 April 2021, requesting an integrated HIA with specific reference to an Archaeological Impact Assessment (see attached **Appendix 2**).

5. METHODOLOGY

5.1 Purpose and Scope of Study

This report is conducted in terms of Section 38 (3) of the National Heritage Resources Act, No 25 of 1999. Dr Lita Webley was appointed to undertake the Archaeological Impact Assessment and the integrated Heritage Impact Assessment (HIA).

A survey of available literature was carried out to assess the general heritage context of the area. A background search of other Cultural Resource Management (CRM) projects in the area was made via the South African Heritage Resources Information Systems (SAHRIS) database. Unpublished reports on the oral history of Struisbaai-Noord/Molshoop were obtained from SANParks.

A field assessment was undertaken on the 16 April 2021. My tracks were recorded by means of a Garmin GPS device and all sites were digitally recorded and photographed. An attempt was made to walk transects across the property, but this was not always possible because of thickets of dense vegetation.

5.2 Assumptions and Limitations

A comprehensive coverage was not possible due to the dense vegetation in certain sections of the study area. However, these were generally in the northern part of Portion A of Erf 856, and this section will not be developed.

6. DESCRIPTION OF THE RECEIVING ENVIRONMENT

The centre point for the site is located at S34 46 42.88, E20 01 57.40

The site is generally flat and undeveloped. The sand is loose and the open patches between the vegetated areas is heavily bioturbated by dune mole activity (Plate 6). There is no evidence of vegetated dunes, drainage lines or any evidence of calcrete outcrops. The vegetation is classified as part of the South Strandveld Bioregion, with Overberg Dune Strandveld vegetation. The vegetation is generally intact although there has been an infestation of rooikranz.

The site is vacant but has in recent years the southern section, adjoining Struisbaai been used as a dumping site and heaps of domestic rubbish are visible across the terrain (Plate 2).



Plate 1: View southward, from the study area towards Struisbaai North, indicating the dense indigenous vegetation with some encroachment of rooikrantz.



Plate 2: Dumping of waste, including old washing machines, computers and mattresses.

Plate 3: There are at least 2 locations where informal dwellings have been demolished and building materials remain.



Plate 4: View in south-easterly direction, from the R319, toward the study area, indicated by the arrow. With the houses of Struisbaai-Noord behind the vegetation in the distance. Note the powerlines running in the foreground. This powerline route was assessed by Avery (2004).

7. HERITAGE BACKGROUND

7.1 Pre-Colonial Archaeology

The study area is approximately 1km from the coast, which is a sandy beach with no rocky outcrops. Although white mussels (*Donax serra*) would have been available for collection by Holocene hunter-gatherers, they would have had to walk a considerable distance to get to the closest rocky shores.

A number of archaeological surveys have been conducted in and around Struisbaai and some are indicated on Figure 6.

In 1995, the Archaeology Contracts Office undertook a first phase archaeological assessment of Erven 922 and 940 in Struisbaai (Halkett & Hart 1995a) (Figure 6). The area in question (now known as Argonauta Park) lies to the south-east of Erf 856. Only two archaeological sites were recorded during the survey. No evidence of any archaeological material could be found on the coastal dunes. The inland limestone flats (although presently heavily vegetated) had been subjected to extensive earthmoving and quarrying activities destroying any archaeological material that may have existed. The one site consisted of various refuse middens associated with the historic settlement at Hotagterklip. Material was exposed on the top of the high vegetated dune in two places and consisted of large quantities of *Donax serra* (white mussel), large amounts of fish bone etc. Artefactual material consisted of ceramic sherds (mostly refined earthenwares ranging from early-mid 19th to 20th century) and glass bottle fragments. The sites were considered to have high significance in terms of material culture of 19th and early 20th century working class people.

The remainder of the midden that lay on Erf 853 was later mitigated at the instruction of the old National Monuments Council (Halkett & Hart 1996). The other site was an ephemeral scatter of shellfish lying next to a path in a densely vegetated area on the inland calcrete flats. Shellfish species consisted of highly fragmented *Oxystele* sp., *Turbo sarmaticus* and *Cymbula granatina* (mixed with fragments of raised beach). Some quartzite manuports were present. The significance was considered to be Low and no mitigation was requested.

Another survey of Portions 7 and 8 of Farm 280, Zoetendalsvlei, to the north east of Erf 856 was undertaken in 1995 (Halkett & Hart 1995b). In all, 15 archaeological sites were identified with the following observations: "The lack of rocky headlands along the coastal frontage has greatly reduced the possibility of there being large numbers of archaeological sites in this area". The distribution of the located sites shows that there was a preference for occupation of the deflated areas between the dunes. The artefactual material suggests an occupation of this area for at least

the last 6000 years. One or two occurrences indicate much older occupation possibly as far back as 80 000 years (Middle Stone Age).

Another project relevant to the area under discussion was undertaken by Kaplan in 2008. He conducted a Phase 1 Archaeological Impact Assessment of the proposed new waterborne sewage system for the holiday towns of Struisbaai and Cape Agulhas. He identified 4 archaeological shell middens and one historic feature along the coast between Struisbaai and Agulhas. It is not clear if these civil works were ever undertaken, and if the recommendations were carried out. No mitigation report can however be found on the SAHRIS database.

In 2012, Webley *et al* assessed the proposed positions for a small number of wind turbines some 3km west of Erf 856 inland of the R319. The topography of the wind energy facility clearly indicated that it was located in an area of old mobile dunes. A total of 14 archaeological sites were recorded which, with the exception of one, consisted of ephemeral fragmented shell exposures on the edges of dunes. As the wind energy project was never finalised, no mitigation has ever been undertaken.

In 2014, Halkett undertook a survey of Erf 857, which is to the south of the study area and west of the R319. There was generally little archaeological material on the site, some occasional marine shell and a few LSA stone tools were noted in a disturbed area along the R319, but he did not consider the sites significant and recommended that they be graded as NCW. The development does not appear to have taken place.

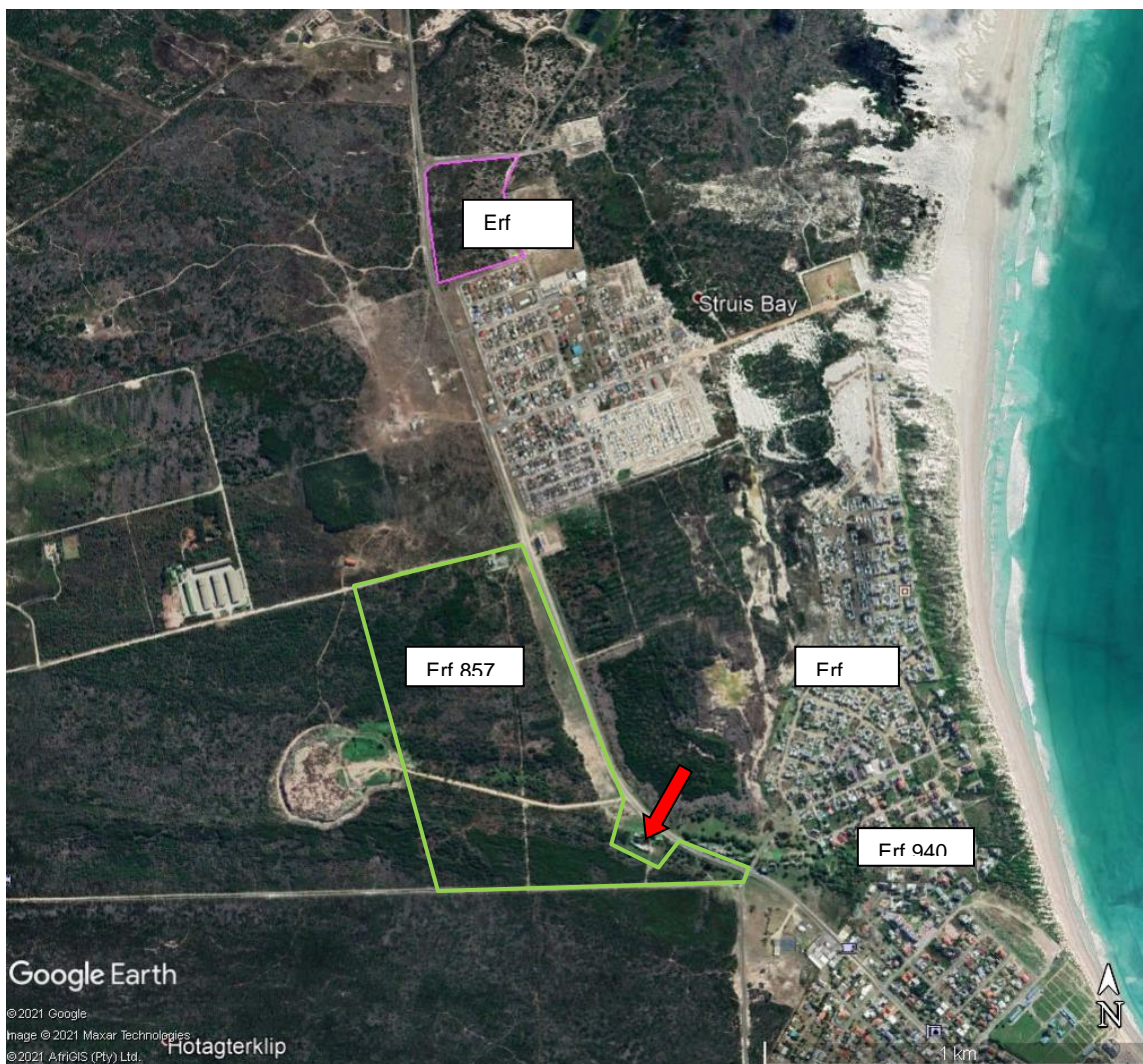


Figure 6: The study area, Erf 856 (in pink) is 1.5km from the coast. Erf 857, which was surveyed by Halkett in 2014 is outlined in green, while Erven 922 and 940 (no site boundaries provided) were surveyed by the Archaeology Contracts Office in 1995. The red arrow points to the PHS site (the Hotagterklip cottages) which are located on Portion 1 of Erf 857.

7.2 Historical Background and Built Environment

Bartolomeu Dias is reported to have anchored at Aguada de Sao Jorge (present day Struisbaai) in 1488 (<https://everitt-capeagulhas.co.za/cape-agulhas-rich-history>) although the exact is clearly difficult to pinpoint. Fransen (2006) provides no information on Struisbaai but notes that the history of Bredasdorp dates back to 1833. The earliest references to the farm with the name Struys Bay dates to 1845. Archival records make refer to “fishery rights” to Struys Bay from 1898 and records dating back to 1913 have reference to a fishing station at ‘Struys Bay’. Farmers were applying for licences to construct fish kraals or ‘vis vyvers’ at Struisbaai from this time. The inhabitants of Struisbaai-Noord/Molshoop are descendants of a small-scale, traditional fishing community (Parker 2013) who have a historical dependence of harvesting marine resources. At one stage, some lived close to the fishing harbour (which dates to 1959) and others in and around Hotagterklip according to the oral history compiled by the Agulhas National Park (2011). They were forcibly removed during the 1960s and settled in the houses constructed at Struisbaai-Noord/Molshoop.

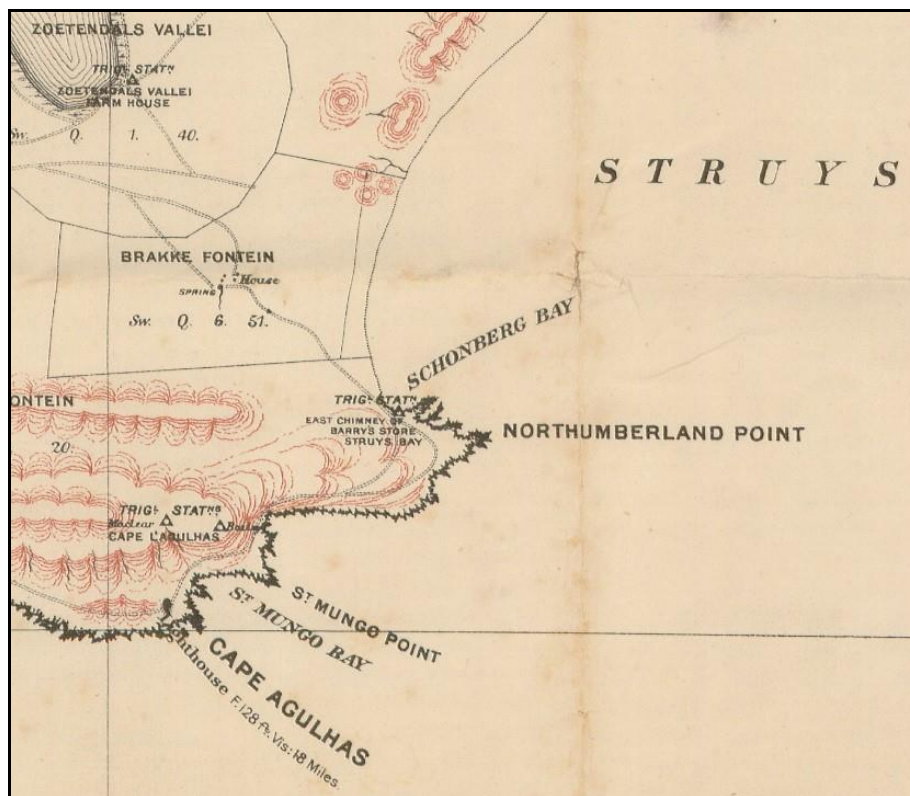


Figure 7: Extract from the Bredasdorp (Southern Districts) map of 1880-1890, showing the hamlet of ‘Struys Bay’ and the location of Barry’s Store approximately on the location of the calcrete ridge (where the Hotagterklip cottages are located today).



Figure 8: Aerial photograph from 1940, showing the undeveloped nature of the landscape around Struisbaai (Agulhas National Park 2011).

7.3 Cemeteries

The new cemetery is located to the north of Struisbaai-Noord, with the older cemetery situated in the village. The new cemetery is 140m to the east of the northern extent of Erf 856. There is no evidence of graves or informal burials taking place on Erf 856. However, the possibility of unmarked, pre-colonial graves on the Erf cannot be ruled out.

8. RESULTS

8.1 Archaeological Survey

The survey was undertaken on the 16th April 2021. Sections of the veld was impenetrable, and it was not possible to undertake regular transects. Where the surface soil was open and clear of vegetation, it was examined closely for any signs of archaeological material. The sandy, open areas were heavily bioturbated by mole hills and it is possible that material has been moved. The survey was concentrated on the southern section of Portion A of Erf 856, as this is the area which has been selected for development. The northern part of the Erf will remain undeveloped, natural veld (Figure 3).

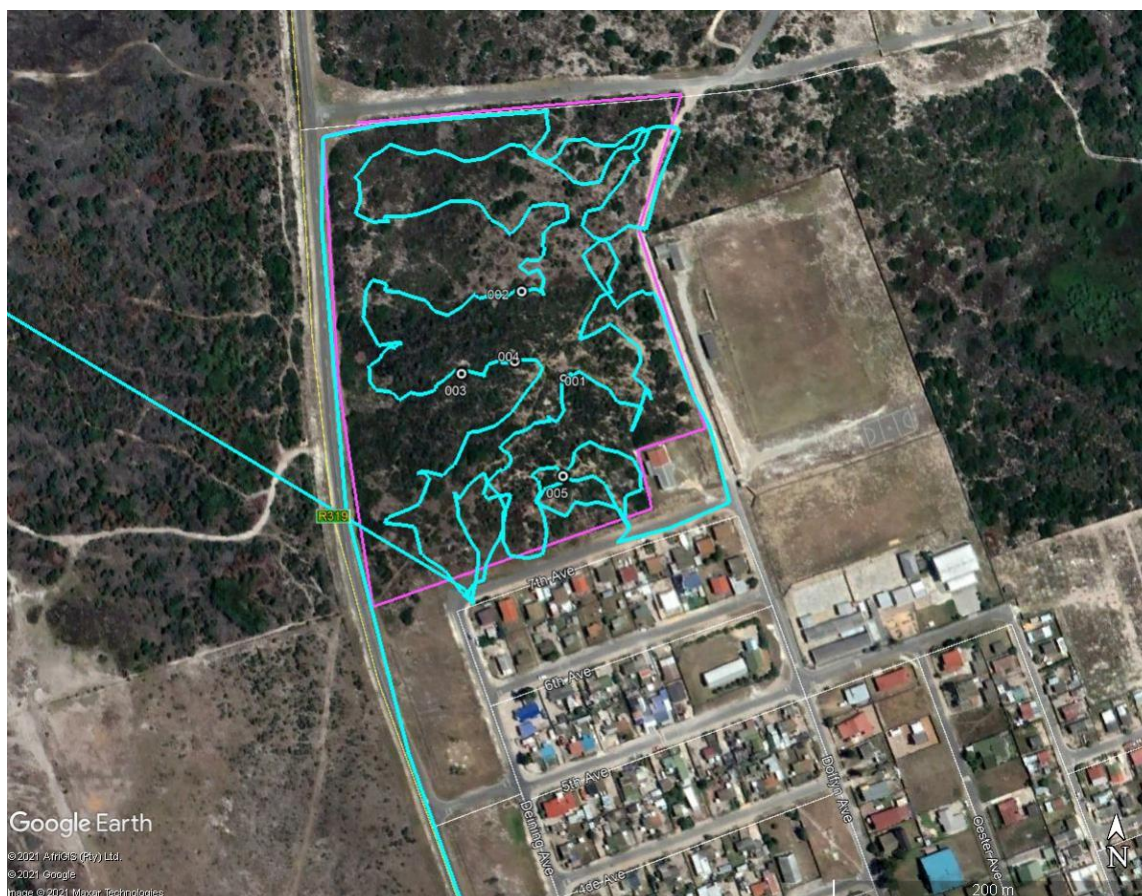


Figure 9: Track paths (in blue) and waypoints are indicated. Only Point 001, 002 and 004 (in the centre of the Erf) represent ephemeral scatters of marine shell. The others are remnants of recent wooden informal dwellings which have since been demolished.

Table 2: List of sites recorded.

Site Name	Co-ordinates	Description	Grading	Mitigation
001	34°46'43.83"S 20° 1'58.82"E	Ephemeral scatter of marine shell, including <i>Turbo</i> sp, <i>Oxystele</i> sp shells and 1 quartz chunk over an area of 4 square metres in an area of dune mole activity	NCW	None
002	34°46'42.04"S 20° 1'57.77"E	Ephemeral, small fragments of <i>Oxystele</i> sp shells in a heavily bioturbated area.	NCW	None
003	34°46'43.75"S 20° 1'56.28"E	Remnants of an informal pole and corrugated iron structure (21 st century), demolished and only the sub-structure remaining.	NCW	None
004	34°46'43.49"S 20° 1'57.60"E	Fragments of <i>Haliotis</i> sp, 1 <i>Scutellastra longicosta</i> and 1 <i>Oxystele</i> sp. in a sandy patch, bioturbated by dune mile activity.	NCW	None
005	34°46'45.85"S 20° 1'58.82"E	Remnants of an informal pole and corrugated iron structure (21 st century), demolished and only the sub-structure remaining.	NCW	None

The most significant problem with identifying possible shell midden sites, was the occurrence of more recent dumping of marine shell on the site. In one case, a black back was recovered which contained a large number *Haliotis* sp. shells. Clearly, both legal and illegal harvesting of marine shell from the adjoining coast is being dumped on the property. Further, it is likely that the people who lived in the informal dwellings would also have harvested marine resources.



Plate 6: Showing the open patches of soil between the dense vegetation which had been turned over by dune moles.



Plate 7: Site 001, indicating the ephemeral shell distribution which was recorded outside of the development footprint.

9. IMPACT IDENTIFICATION AND ASSESSMENT

9.1 Archaeology

The potential for the proposed development to impact above ground heritage resources is very low.

With respect the potential for significant archaeological remains to be uncovered, Halkett (2014) noted with respect Erf 857 (on the opposite side of the road): “While looking back over previous archaeological assessments from the area, we have noted the overall paucity of archaeological sites inland of the coast that were not originally part of active dune systems. It may be that this relates primarily to the fact that vegetation in stable soil areas may simply have been too thick for easy access, and hence occupation was focussed elsewhere. Proximity to water and shellfish and other coastal food resources would also have been likely considerations” (2014: 9).

This HIA report supports earlier conclusions. It is possible, although not probable, that there may be below ground archaeological remains such as shell middens or human burials. If these are uncovered, the responsible Environmental Control Officer should immediately stop work in that area and notify HWC.

Table 3: Potential Impacts to Archaeological Resources

Nature of Impact: Destruction of above and below ground archaeological resources, including pre-colonial graves		
	Without Mitigation	With Mitigation
Extent	Local (1)	1
Duration	Permanent (5)	5
Magnitude	Minor (2)	1
Probability	Improbable (2)	1
Significance	Low (16)	7
Irreplaceable loss of resources?	No	No
Can impacts be mitigated?	N/A	N/A
Mitigation: None. If any archaeological remains are uncovered during earthworks, the ECO must contact HWC immediately		
Cumulative Impacts: Negligible		
Residual Impacts: None		

9.2 Consultation

In their response to the NID submission (18 August 2020), HWC requested an integrated HIA and “*The commends of relevant registered conservation bodies, all Interested and Affected Parties, and the relevant Municipality must be requested and included in the HIA where provided. Proof of these requests must be submitted*”.

The integrated HIA was submitted to the registered conservation bodies which included: Whale Coast Conservation and Agulhas Heritage Society as well as the Cape Agulhas Municipality (see **Appendix 4**). The Whale Coast Conservation had no objection to the development.

The Agulhas Heritage Society did not have any objection to the proposed development but did express concerns around the retention of the old and young milkwood trees on the property. The final position of the Primary School and School of Skills have been adjusted to retain the trees.

10. RECOMMENDATIONS

The anticipated impacts of the proposed development on archaeological resources is Low. If any below ground archaeological remains such as shell middens or human burials are uncovered during earth works, the ECO should stop work in that area immediately and notify HWC.

Therefore, there can be no objections to the authorization of the project.

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Agulhas National Park. 2011. *Hotagterklip: 'n onvertelde geskiedenis*. Mondelinge geskiedenisprojek (oral history) befonds deur Suid-Afrikaanse Nasionale Parke. Onderhoude gevoer en inligting ingesamel deur Melani Joumat. Tikwerk en uitleg deur Jessica Engel.

APPENDIX 2

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Our Ref: HM/ EDEN / HESSEQUA / STILL BAY/ ERF 856
Case No.: 20032622SB0315E
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RESPONSE TO NOTIFICATION OF INTENT TO DEVELOP: HIA REQUIRED
In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999) and the Western Cape Provincial Gazette 6061, Notice 298 of 2003

NOTIFICATION OF INTENT TO DEVELOP: PROPOSED REDEVELOPMENT OF THE SITE ON ERF 856 SWENDE LAAN, STRUISBAAI, SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)

CASE NUMBER: 20032622SB0315E

The matter above has reference.

Heritage Western Cape is in receipt of your application for the above matter received on 17 March 2021. This matter was discussed at the Heritage Officers Meeting held on 25 March 2021.

You are hereby notified that, since there is reason to believe that the proposed Redevelopment of the Site on Erf 856 Swende Laan, Struisbaai will impact on heritage resources, HWC requires that a Heritage Impact Assessment (HIA) that satisfies the provisions of Section 38(3) of the NHRA be submitted. Section 38(3) of the NHRA provides

- (3) *The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection (2)(a): **Provided that the following must be included:***
- (a) *The identification and mapping of all heritage resources in the area affected;*
 - (b) *an assessment of the significance of such resources in terms of the heritage assessment criteria set out in section 6(2) or prescribed under section 7;*
 - (c) *an assessment of the impact of the development on such heritage resources;*
 - (d) *an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development;*
 - (e) *the results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources;*
 - (f) *if heritage resources will be adversely affected by the proposed development, The consideration of alternatives; and*
 - (g) *plans for mitigation of any adverse effects during and after the completion of the proposed development.*

(Our emphasis)

This HIA must in addition have specific reference to the following:

- Archaeological Impact Assessment

www.westerncape.gov.za/cas

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• **Tel:** +27 (0)21 483 5959 • **E-mail:** caoheritage@westerncape.gov.za

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Our Ref: HM/ EDEN / HESSEQUA / STILL BAY/ ERF 856
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The HIA must have an overall assessment of the impacts to heritage resources which are not limited to the specific studies referenced above.

The required HIA must have an integrated set of recommendations.

The comments of relevant registered conservation bodies; all Interested and Affected parties; and the relevant Municipality must be requested and included in the HIA where provided. Proof of these requests must be supplied.

Please note, should you require the HIA to be submitted as a Phased HIA, a written request must be submitted to HWC prior to submission. HWC reserves the right to determine whether a phased HIA is acceptable on a case-by-case basis.

If applicable, applicants are strongly advised to review and adhere to the time limits contained the Standard Operational Procedure (SOP) between DEADP and HWC. The SOP can be found using the following link <http://www.hwc.org.za/node/293>

Kindly take note of the HWC meeting dates and associated agenda closure date in order to ensure that comments are provided within as Reasonable time and that these times are factored into the project timeframes.

HWC 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.

.....
Colette Scheermeyer
Acting Chief Executive Officer



APPENDIX 3
FOSSIL FINDS PROTOCOL

**APPENDIX 4
PUBLIC PARTICIPATION PROCESS**