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31 July 2026

SUPPLEMENTARY LETTER COMMENTING ON VISUAL IMPACTS ACCOMPANYING APPROVED HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED MIXED-USE HOUSING DEVELOPMENT ON PORTION 4 OF FARM 6, MALMESBURY ROAD, STOMPNEUS BAY

The purpose of this application is to rezone a Portion (5.4 Ha) of Portion 4 of Farm 6 in St Helena Bay (Stompneus Bay), to subdivisional area to create a mixed use residential development. The property will then be subdivided into 191 portions. The subdivisional area will include the following subdivision and zonings:

- 185 Residential Zone IV erven
- 3 Open Space Zone I erven
- 1 Institutional Zone I erf (Crèche)
- 1 Institutional Zone II erf (Church)
- 1 Transport Zone II

The Portion 4 of Farm 6, proposed for development is favourably located within the existing residential area of St Helena Bay (Stompneus Bay). The land was donated to Saldanha Municipality by Lucky Star Pty Ltd. The proposed development will provide 185 additional low-cost housing opportunities within the urban edge of St Helena Bay (Stompneus Bay) as well as three open spaces, two institutional uses and a transport zone. According to the Saldanha Bay Municipal Spatial Development Framework (2025-2030), the development area, Portion 4 of Farm 6, Malmesbury RD, is identified in the Spatial Development Proposals map as a new development area in Zone C (SCH1). SHC1 accommodates 114.81 Ha of developable land for residential use. Ancillary uses such as an institutional facility are also promoted. The proposal aligns with the spatial development framework to utilize a portion of Portion 4 of Farm 6 for new residential development and supporting services. The land contains an electrical servitude but, according to the client, this will not affect the development area.

Saldanha Bay Municipality wants to establish a housing development due to the housing backlog and the need to provide applicants on the waiting list of Saldanha Bay Municipality with housing opportunities in the area. The portion of land is earmarked for residential expansion by the Municipality and is therefore in line with the proposal. The proposed development area provides an ideal opportunity for residential development to optimise the use of the existing road network and services that already occur west of the site. The surrounding area consists mainly of a higher density residential development with supporting social infrastructure. It is therefore the intention to subdivide and rezone an area of ±5.4ha of said portion of land for the purpose of establishing a housing project.

According to the client, the proposed development is considered desirable based on the following;

- The residential character of the area will be strengthened through the proposed development.
- It supports the proposals of the Saldanha Bay Spatial Development Framework.
- Home ownership will be made available for previously disadvantaged people.
- The development supports the Western Cape SDF by promoting compactness within the existing urban areas;
- The development supports the principles of SPLUMA and LUPA;



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- The aim of the proposed development is to utilise the existing property within the urban edge and develop it to its optimal potential.

1.2 Heritage Specialists' Comments on the visual impacts of the development

Heritage Western Cape received a Notification of Intent to Develop in August 2025 completed by CTS Heritage which was accompanied by a Heritage Screener outlining the archaeological, built environment, palaeontological and cultural landscape sensitivities of the proposed development site. CTS Heritage recommended no further studies given that the terrain had previously been ploughed under agricultural fields, the palaeosensitivity of the underlying geology was insignificant to low, and no significant heritage buildings are located in close proximity to the study site. The screener also looked at the impact on cultural landscapes and found that this impact was expected to be low as the development would augment an existing suburb with residential erven in a similar density to the existing built up area.

Erven 2302 and 4103 have subsequently been sub-divided into multiple erven, and today contain the Stompneus Village housing development that borders the proposed housing development. Based on existing reports and mapping of the study area, the proposed development is not located near any historical werfs, nor any associated infrastructure or tree lines. Additionally, the context of the proposed development area is dominated by existing modern residential development. As such, impact on significant cultural landscape and built environment resources is unlikely.

HWC concurred with CTS Heritage's findings but differed in their anticipated impact on archaeological resources only. They felt that, in this context, the possibility of finding shell middens within 500m of the high water mark was a distinct possibility and that an Archaeological Impact Assessment would be required as part of the Heritage Impact Assessment for the development. HWC did not request a specialist VIA or Cultural Landscape Impact Assessment.

A specialist AIA was conducted by CTS and formed part of the HIA for the proposed development application that was approved by Heritage Western Cape's IACOM on 11 March 2026.

To summarise the low cultural landscape impacts of the development:

- The terrain is almost completely flat across the study site (see photomontage in Figures 2.1-2.13)**
- The study site augments the existing Stompneus housing development bounded by Mercury Street and Concorde Drive**
- The proposed development is of a similar urban morphology and density to the existing housing development and will therefore result in very little change to the character of the surrounding environment. See Figure 1.3 - Site Development Plan.**
- The proposed development area is small - only 490m x 120m at its widest and longest sections.**
- There are no especially highly sensitive receptors to the proposed development (scenic routes, nature reserves) and the coastline end of the development is part of the already built up area of the Stompneus housing development with only a small addition alongside it - the bulk of the development lies on the inward side away from the sea.**



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From a heritage perspective, the proposed development was found to have very low to negligible impacts on heritage resources and that the visual impact of adding additional housing to an existing housing development in this context is very low. We do not recommend further work trying to mitigate or assess the visual impacts of the proposed development.

Yours sincerely,

Nicholas Wiltshire, Director and Principle Heritage Specialist

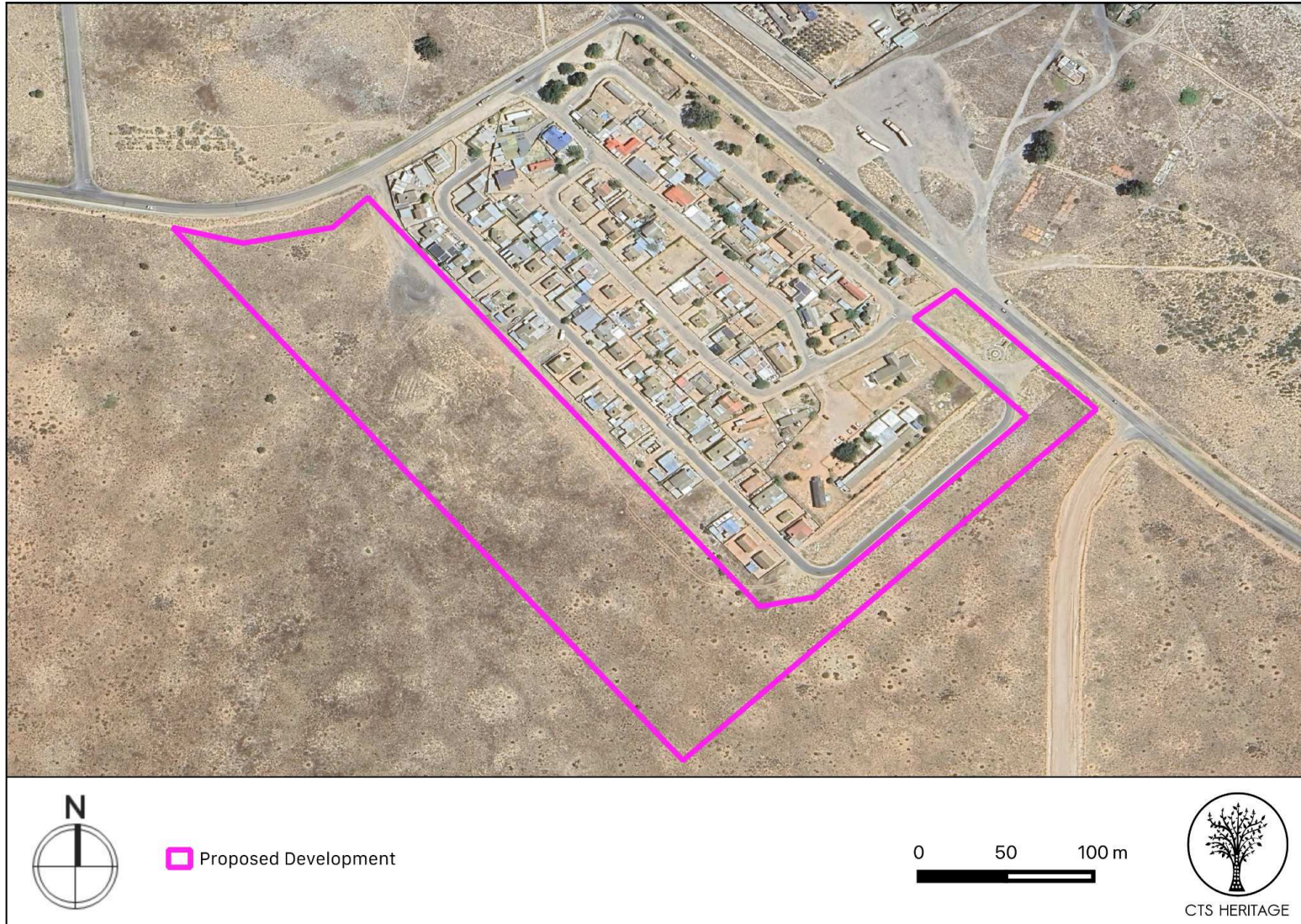
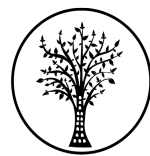


Figure 1.1 Satellite image (2025) indicating the proposed development area



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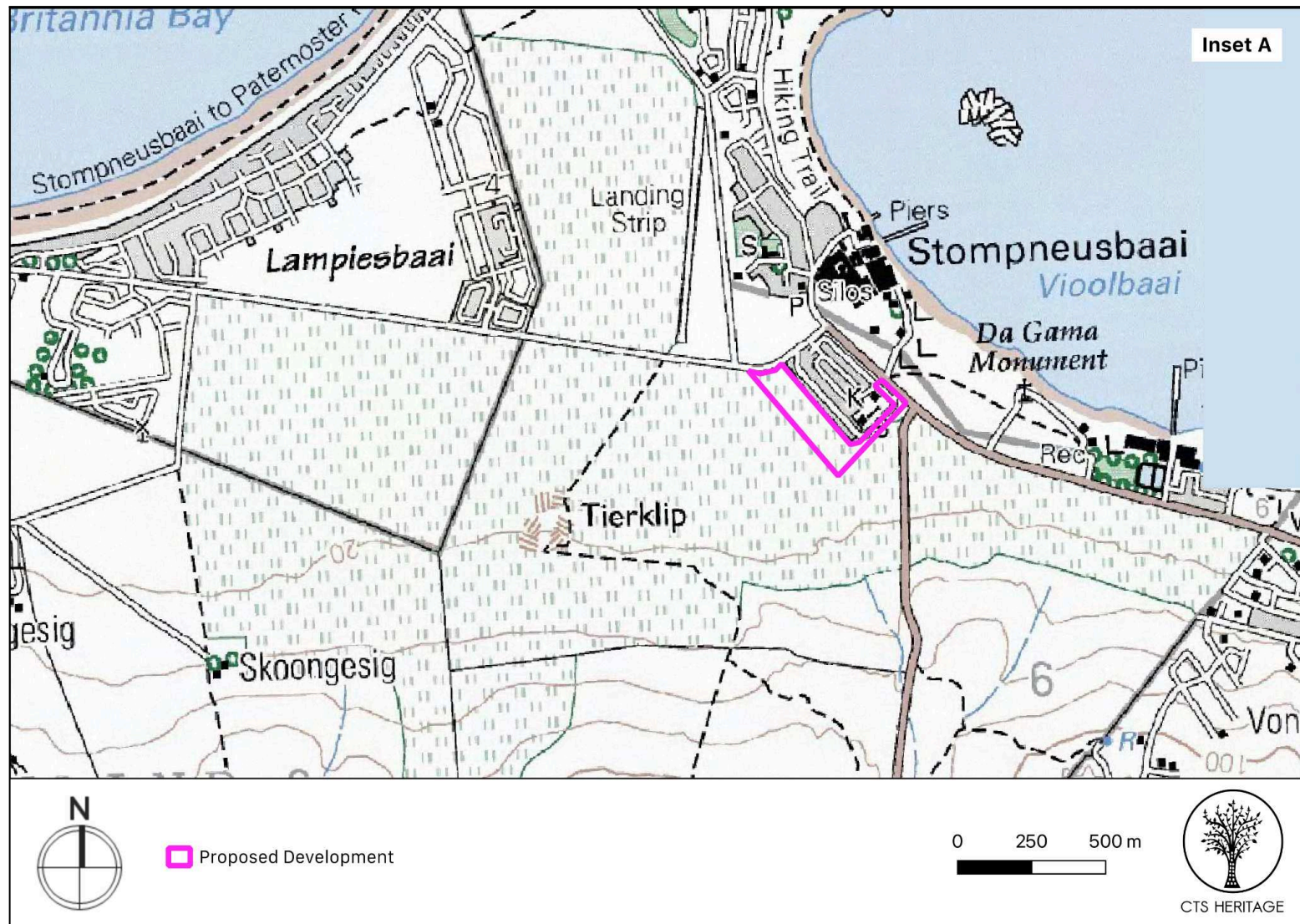


Figure 1.2 1:50 000 Topo Map for the development area



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Figure 2.1 The gravel roads behind Stompneus Village and the rising slopes and granitic outcrops to the east



Figure 2.2 Western edge of Stompneus Village, the gravel road present in the study area, and Concorde Drive lined with powerlines



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Figure 2.3 View from the southern boundary of the study area



Figure 2.4 View of the vacant land and slopes south of the study area



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Figure 2.5 Concorde Drive and the white houses of Lampiesbaai to the west



Figure 2.6 View from the eastern edge showing some domestic refuse across the study area



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Figure 2.7 The northern section of the study area, perpendicular to Main Street, with the Atlantic Ocean in view



Figure 2.8 View south from the northern section of the study area which had some denser vegetation on the roadside



Figure 2.9 Panorama illustrating areas of the study site characterised by low sandy mounds and slight elevation



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Figure 2.10 View to the southwest showing vacant land with open patches in the vegetation occurring across the area



Figure 2.11 View from the southern boundary of the study area showing the eastern edge of Stompneus Village with Main Street and the Atlantic Ocean to the north



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Figure 2.12 Northeastern section of the proposed development, between Main and Mercury Street, has previously been scraped and most of the shell midden has been disturbed



Figure 2.13 Stompneusbaai welcome sign and succulent garden located on Main Street.

Our Ref: HM / WEST COAST/ SALDANHA BAY/ ST HELENA BAY/ PORTION 4 OF FARM 6
Case No.: HWC25071113CSI0821
Enquiries: Chiara Singh
E-mail: Chiara.Singh@westerncape.gov.za
Tel: 021 829 3325



Zanelle Nortje | Saldanha Municipality
Applicant | Owner
zanelle@rumboll.co.za | ryan.groenewaldt@sbm.gov.za

RESPONSE TO NOTIFICATION OF INTENT TO DEVELOP: HIA REQUIRED
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

NOTIFICATION OF INTENT TO DEVELOP: PROPOSED REZONING OF A PORTION (618.4600 HA) OF PORTION 4 OF FARM 6 IN ST HELENA BAY (STOMPNEUS BAY), TO A SUBDIVISIONAL AREA TO CREATE A MIXED-USE RESIDENTIAL DEVELOPMENT. THE PROPERTY WILL THEN BE FURTHER SUB-DIVIDED INTO 191 PORTIONS, SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)

The matter above has reference.

Heritage Western Cape is in receipt of your application for the above matter received. This matter was discussed at the Heritage Officers Meeting held on 1 September 2025.

You are hereby notified that, since there is reason to believe that the proposed rezoning of a portion (618.4600 Ha) of portion 4 of farm 6 in St Helena Bay (Stompneus bay), to a subdivisional area to create a mixed-use residential development. The property will then be further sub-divided into 191 portions located on Portion 4 of Farm 6, Viking Crescent, St Helena Bay, 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.

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

- Archaeological impact Assessment

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.

www.westerncape.gov.za/cas

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Our Ref: HM / WEST COAST/ SALDANHA BAY/ ST HELENA BAY/ PORTION 4 OF FARM 6
Case No.: HWC25071113CSI0821
Enquiries: Chiara Singh
E-mail: Chiara.Singh@westerncape.gov.za
Tel: 021 829 3325

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.



Waseefa Dhansay
Assistant Director: Professional Services



Heritage Western Cape
Erfenis Wes-Kaap
ILifa leMveli leNtshona Koloni

02 September 25



Our Ref: HM/ WEST COAST/ SALDANHA BAY/ ST HELENA BAY/ PTN 4 OF FARM 6
Case No: 26708SB1117
Enquiries: Stephanie Barnardt
E-mail: Stephanie.Barnardt@westerncape.gov.za
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Consultant: Gemma Poretti
gemma.poretti@ctsheritage.com

RESPONSE TO DOCUMENTATION: FINAL COMMENT
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

HIA: PROPOSED REZONING OF A PORTION OF PORTION 4 OF FARM 6 TO A SUBDIVISIONAL AREA TO CREATE A MIXED-USE RESIDENTIAL DEVELOPMENT, STOMPNEUS BAAI, ST HELENA BAY, SUBMITTED IN TERMS OF SECTION 38(1) OF THE NATIONAL HERITAGE RESOURCES ACT (ACT 25 OF 1999)

The matter above has reference.

This matter was discussed at the Impact Assessment Committee (IACOM) held on 11 March 2026

FINAL COMMENT:

The Committee resolved to endorse the Heritage Impact Assessment (HIA), titled "Proposed Rezoning of a Portion of Portion 4 of Farm 6 to a Subdivisional Area to create a Mixed-Use Residential Development, Stompneus Baai, Western Cape Province", dated February 2026 and prepared by CTS Heritage, as having met the provision of Section 38(3) of the National Heritage Resources Act (NHRA), with specific reference to the following recommendations on page 41 of the report, as follows:

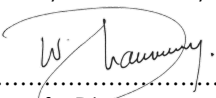
Implementation of the Chance Finds Fossil Procedure (Appendix 3) is required during all ground-disturbing activities.

- 1 Implementation of the Chance Finds Burial Procedure (Appendix 3) is required during all ground-disturbing activities. This is particularly important within the 500 m high sensitivity coastal zone and is essential in the immediate vicinity of Observation 002, the disturbed shell midden adjacent to Main Street.
- 2 Should any buried archaeological resources, human remains or burials be uncovered during the course of development activities, work must cease in the vicinity of these finds. Heritage Western Cape (HWC) must be contacted immediately in order to determine an appropriate way forward.

The endorsement contained in this comment is valid for 5 years from the date of this comment. This period may be extended on good reason being shown and at the discretion of HWC, provided that application for extension must be made prior to the effluxion of the 5-year period.

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.


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Waseefa Dhansay
Assistant Director: Professional Services



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