

# APPLICATION FORM NOTIFICATION OF INTENT TO DEVELOP (NID) SECTION 38 (1) AND SECTION 38 (8)

Heritage	Western	Cane	Reference	No
Helliade	11 6316111	Cube	Veleteletie	110

To be completed by the applicant

2110 1113

Completion of this form is required by Heritage Western Cape for the initiation of all impact assessment processes under Section 38 (1) & (8) of the National Heritage Resources Act (NHRA)

As per Section 38 (1) (e) of the NHRA, submission of the NID must be initiated at the earliest stage of development. Should the development trigger any other legislation, practitioners may submit the NID without formal submission to other statutory bodies in order to comply with the NHRA.

This form is to be read in conjunction with the HWC Notification of Intent to Develop, Heritage Impact Assessment, (Pre-Application) Basic Assessment Reports, Scoping Reports and Environmental Impact Assessments, Guidelines for Submission to HWC

Whilst it is not a requirement, it may expedite processes and in particular avoid calls for additional information if certain of the information required in this form is provided by a heritage specialist/s with the necessary qualifications, skills and experience. All sections of the form must be completed in order to deem the application to be complete.

Making an incorrect statement or providing incorrect information may result in all or part of the application having to be reconsidered by HWC in the future, or submission of a new application.

The following information is to be included upon submission to HWC:

- 1. Proof of payment with correct reference number
- 2. Completed and signed application form the application form must be completed in full in order to be considered
- 3. Power of Attorney
- 4. Locality Map
- 5. Images of the site and its context
- 6. Additional information pertaining to the heritage of the site

Application and associated documentation to be emailed to ceoheritage@westerncape.gov.za

# A. APPLICABILITY OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NEMA)

Department of Environmental Affairs Development Planning (Western Cape); Department of Mineral Resources (National); Department of Environmental Affairs (National); Reference Number (if applicable):		
Please tick the applicable section:		
	This application is made in terms of Section 38(8) of the NHRA and an application under NEMA has been made to the following authority:	
	This development will not require a NEMA application.	

# **B. BASIC DETAILS**

#### **PROPERTY DETAILS:**

TROTERIT BETAILS:	
Name of property: Portions 130, 131 & 132 of Municipality	the farm Gwayang 208, George District and
Street address or location (eg: off R44): Along R102 ("A	Airport Road"), George
Erf or farm number/s: <b>As stated above</b>	Coordinates: \$ 33° 59' 48.80" E 22° 22' 59.17"
Town or District: <b>George</b>	Municipality: George Municipality
Extent of properties: 208/130 – 5.9562 ha 208/131 – 9,868m <sup>2</sup> 208/132 – 8,120m <sup>2</sup>	Current use: Agriculture/ Vacant
Predominant land use/s of surrounding properties:  Agriculture, Nurseries	George Airport, Quarry, Intensive and Extensive

# **REGISTERED OWNER OF PROPERTY:**

Name and Surname: George	e Aerotropolis (Pty) Ltd (N	Ar. Abubaker Varahhia (SA Id		
5806185103087))				
Address George Aerotropolis (Pty) Ltd, 16th Floor, 2 Long Street, Cape Town, 8001				
		- "		
Telephone N/A	Cell <b>N/A</b>	E-mail  Michael@mdaprojects.co.za		
APPLICANT/ AUTHORISED AGENT:				
Name and Surname: Perception Planning (Stéfan de Kock) (see Power of Attorney attached)				
Address: PO Box 9995, George, 6530				
Telephone N/A	Cell <b>082 568 4719</b>	E-mail perceptionplanning@gmail.com		

By the submission of this form and all material submitted in support of this notification (ie: 'the material'), all applicant parties acknowledge that they are aware that the material and/or parts thereof will be put to the following uses and consent to such use being made: filing as a public record; presentations to committees, etc; inclusion in databases; inclusion on and downloading from websites; distribution to committee members and other stakeholders and any other use required in terms of powers, functions, duties and responsibilities allocated to Heritage Western Cape under the terms of the National Heritage Resources Act. Should restrictions on such use apply or if it is not possible to copy or lift information from any part of the digital version of the material, the material will be returned unprocessed. All sections of the form have been completed.

completed.		
Signature of Owner:	Date:	
(Power of Attorney, Proxy attached – Annexure 1	)	18 <sup>th</sup> October 2021
Signature of Applicant/ Authorised Agent:	Date:	
Heritage Western Cape Section 38 Application Fo	orm February 2021	

Applicants/ agents must attach copy of power of attorney to this form.

# C. DEVELOPMENT DETAILS:

	ate below which of the following Sections of as triggered the need for notification of inten	the National Heritage Resources Act, or other to develop.
	S38(1)(a) Construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier over 300m in length.	\$38(1)(c) Any development or activity that will change the character of a site -
	S38(1)(b) Construction of a bridge or similar structure exceeding 50m in length.	(i) exceeding 5 000m² in extent;
	S38(1)(d) Rezoning of a site exceeding 10 000m <sup>2</sup> in extent.	(ii) involving three or more existing erven or subdivisions thereof;
	Other triggers, eg: in terms of other legislation, (ie: National Environment Management Act, etc.) Please set out details:  NEMA EIA Process underway	(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years.  If you have checked any of the three boxes above, describe how the proposed development will change the character of the site:
	NEMA EIA Flocess ofiderwdy	The proposal implies transformation of the property to urban development thus changing its character. Please refer to Background Information Document (BID) for comprehensive description.
If an impact assessment process has also been / will be initiated in terms of other legislation please provide the following information:		

Authority / government department (ie: consenting authority) to which information has been /will be submitted for final decision: **George Municipality** 

Present phase at which the process with that authority stands: Land use application to be submitted

Provide a <u>full</u> description of the nature and extent of the proposed development or activity including its potential impacts:

The proposal is to consolidate the three properties and rezone/ subdivide the newly-created portion to a subdivisional area to make provision for eight light industrial erven (Industrial Zone I), ancillary services (Utility Zone) and a private road reserve (Transport Zone III) as outlined in the table below. The conceptual site development plan is attached as Annexure 3 to the BID report.

Portion No.	Extent (m²)	Proposed Zoning
1	20,070	Industrial Zone I
2	7,906	Industrial Zone I
3	6,063	Industrial Zone I
4	5,519	Industrial Zone I
5	6,479	Industrial Zone I
6	5,015	Industrial Zone I
7	5,404	Industrial Zone I
8	9,157	Industrial Zone I
9	150	Utility Zone
10	37,493	Transport Zone III

Estimated value	cost of the project in South African Rands: RUnknown at this stage		
D. ANTICIPATED IMPACTS ON HERITAGE RESOURCES			
forming part of	e National Heritage Resources Act sets out the following categories of heritage resource as the national estate. Please indicate the known presence of any of these by checking the and then providing a description of each occurrence, including nature, location, size, type		
•	de sufficient detail or to anticipate the likely presence of heritage resources on the site may est for more detailed specialist information.		
Provide a short	history of the site and its environs (Include sources where available):		
1910 (S.G. Diag east, covering Adriaan H Star the farm Gway	all and settlement morphological perspective the farm Gwayang 208 was originally surveyed in gram $1474/1910$ ) and extended from both the Pacaltsdorp and George commonages to the an area of 1,980 morgen 520 sq. roods ( $\pm 1,774$ ha) (see Figure 7). The farm was granted to ader "and fifteen others" during April $1911^1$ . The portion of land presently known as portion 4 of rang is indicated as having been transferred to JC Barnard during June $1912^2$ . This portion was ormally surveyed in $1945$ .		
Basic historical background research did not identify or highlight any other significant heritage-related aspects related to this particular portion of land. It is unlikely that detailed archival research would provide further meaningful insight into former use and/or broader understanding of heritage-related themes of the area.			
	e which heritage resources exist on the site and in its environs, describe them and indicate the mpact upon them:		
•	Places, buildings, structures and equipment of cultural significance		
	Description of resource:		
	Description of impact on heritage resource:		
	Places to which oral traditions are attached or which are associated with living heritage		
Description of resource:			
	Description of impact on heritage resource:		
	Historical settlements and townscapes		
	Description of resource:		
	Description of impact on heritage resource:		

	Landscapes and natural features of cultural significance
	Description of resource:
	Description of impact on heritage resource:
	Geological resources of scientific or cultural importance
	Description of resource:
	Description of impact on heritage resource:
	<b>Archaeological resources</b> (Including archaeological sites and material, rock art, battlefields & wrecks):
	Description of resource:
	Description of impact on heritage resource:
	Palaeontological resources (ie: fossils):
	Description of resource:
	Description of impact on heritage resource:
	<b>Graves and burial grounds</b> (eg: ancestral graves, graves of victims of conflict, historical graves & cemeteries):
	Description of Resource:
	Description of Impact on Heritage Resource:
	Other human remains:
	Description of resource:
	Description of impact on heritage resource:
	Sites of significance relating to the history of slavery in South Africa:
	Description of resource:
	Description of impact on heritage resource:  Other heritage resources:
	Description of resource:
Describe elem	Description of impact on heritage resource:  ents in the environs of the site that could be deemed to be heritage resources:
	_
None	
Description of i	impacts on heritage resources in the environs of the site:
No Impacts an	ticipated

Summary of	anticipated impacts on heritage resources:		
Plagra refer			
rieuse ieiei	o BID for comprehensive description.		
E. ILLUSTRATI	VE MATERIAL:		
proposed dev	form a minimum A4 sized locality plan showing the boundaries of the area affected by the relopment, its environs, property boundaries and a scale. The plan must be of a scale and size riate to creating a clear understanding of the development.		
	ther relevant graphic material such as maps, site plans, satellite photographs and photographs d the heritage resources on it and in its environs. These are essential to the processing of this		
essential that	e all graphic material on paper of appropriate size and on CD/ USB in JPEG format. It is graphic material be annotated via titles on the photographs, map names and numbers, names provision of a numbered list describing what is visible in each image.		
F. RECOMMI	ENDATION		
In your opinior	n do you believe that a heritage impact assessment is required? 🔲 Yes 🔲 No		
Recommendo	ation made by:		
Name <b>Stéf</b> o	an de Kock		
Capacity <b>Pr</b>	ofessional Heritage Practitioner (APHP)		
	No Heritage Impact Assessment should be submitted with this form or conducted until Heritage has expressed its opinion on the need for such and the nature thereof.		
	ATION TO BE PROVIDED AND STUDIES TO BE CONDUCTED AS PART OF THE HERITAGE SSMENT (HIA)		
If it is recomm	ended that an HIA is required, please complete this section of the form.		
DETAILS OF STU	JDIES TO BE CONDUCTED IN THE INTENDED HIA		
In addition to	the requirements set out in Section 38(3) of the NHRA, indicate envisaged studies:		
	Heritage resource-related guidelines and policies.		
	Local authority planning and other laws and policies.		
	Details of parties, communities, etc. to be consulted.		
	Specialist studies, eg: archaeology, palaeontology, architecture, townscape, visual impact, etc. Provide details:		
	Other. Provide details:		
form of a sin-	Any further studies which Heritage Western Cape requires should be submitted must be in the gle, consolidated report with a single set of recommendations. Specialist studies must be in full either as chapters of the report or as appearing thereto.		

Please refer to the Guidelines for Heritage Impact Assessments required in terms of Section 38 of the National

Heritage Resources Act (Act 25 of 1999)	
Tremage Resources / ter [/ ter 20 or 1///]	

HWC Ref: 2110 1113

# BACKGROUND INFORMATION DOCUMENT TO NOTICE OF INTENT TO DEVELOP (NID) IN TERMS OF SECTION 38(8) OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999)

# PROPOSED DEVELOPMENT OF THE FARMS GWAYANG 208/130, 131 & 132, GEORGE DISTRICT AND MUNICIPALITY



# On behalf of: GEORGE AEROTROPOLIS (PTY) LTD

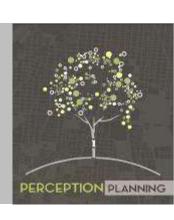
#### OCTOBER 2021

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# STÉFAN DE KOCK

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# **PERCEPTION Planning**

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- 6. 1880-1900 SG Mapping
- 7. Extract 1939 Aerial imagery

# REFERENCES and ACKNOWLEDGEMENTS

- 1. Cape Town Archives
- 2. George Built Heritage Inventory, 2016
- 3. George Municipal Spatial Development Framework, 2019
- 4. George Central Area Local Structure Plan, 2012
- 5. Kathleen Schulz, Southern Cape Historian
- 6. National Geo-Spatial Information, Department of Rural Development and Land Reform, Mowbray
- 7. Surveyor General Office

# **ABBREVIATIONS**

- 1. DEA National Department of Environmental Affairs
- 2. HWC Heritage Western Cape
- 3. NHRA National Heritage Resources Act, 1999 (Act 25 of 1999)
- 4. HIA Heritage Impact Assessment
- 5. HWC Heritage Western Cape
- 6. PHS Provincial Heritage Site
- 7. NGSI National Geo-Spatial Information, Department of Rural Development and Land Reform, Mowbray

COVER: Location of site in relation to 1957 aerial imagery for the area (Survey 403, Flight Strip 7, Image 3270, NGSI as edited)

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#### 1. INTRODUCTION

PERCEPTION Planning was appointed by Abubaker Varahhia (SA Id 5806185103087) on behalf of George Aerotropolis (Pty) Ltd (being the registered owner) to submit to Heritage Western Cape (HWC) a Notice of Intent to Develop (NID) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act 25 of 1999) with relation to proposed development of the subject properties as outlined in further detail in this report. The Power of Attorney, Title Deed and S.G Diagram are attached as part of **Annexure 1**.

The cadastral land units subject to this application are as follows:

- Portion 130 of the farm Gwayang 208, measuring 5.9562 ha, registered to George Aerotropolis (Pty) Ltd, held under Title Deed No. 55725/2018, situated within the jurisdiction of the George District and Municipality, Western Cape;
- Portion 131 of the farm Gwayang 208, measuring 9,868m², registered to George Aerotropolis (Pty) Ltd, held under Title Deed No. 30767/2021, situated within the jurisdiction of the George District and Municipality, Western Cape;
- Portion 132 of the farm Gwayang 208, measuring 8,120m², registered to George Aerotropolis (Pty) Ltd, held under Title Deed No. 41925/2019, situated within the jurisdiction of the George District and Municipality, Western Cape.

#### 2. BRIEF DESCRIPTION OF STUDY AREA

The proposed development site ("the site") includes the above properties ( $\pm$  7.755ha in extent), is situated  $\pm$  8km southwest of the George town centre, directly northeast of the George Airport and right at the highly trafficked R102/R404 intersection (old George-Great Brak River road and the Blanco-Airport-Herold's Bay road,



Figure 1: Site location within context of George urban area (GoogleEarth©, as edited)

The site forms part of an undulating rural/ agricultural landscape with no steep or prominent slopes save for a shallow depression within close proximity to the southernmost portion of the site (**Figure 2**). The site has been completely transformed through agriculture/ cultivation and is overgrown by grass. No structures, ruins or gravesites were noted during field work undertaken on 18<sup>th</sup> September 2021. A row of predominantly semi-mature indigenous yellowwood trees occurs along the southwest site boundary bound by the R404, directly opposite the main entrance to the George Airport (**Figure 3**).

Existing land use within the direct proximity includes several plant nurseries along the "airport road" connecting the airport to George, rural occupation, extensive agriculture (grazing, cultivated fields), intensive agriculture

(e.g. poultry farming) and two established quarries further to the northwest and directly south of the property. Photographs of the site and its environs are attached as **Annexure 2**.



Figure 2: Study area shown within context of surrounding rural landscape (GoogleEarth©, as edited)



Figure 3: Existing features noted on the study area during field work (GoogleEarth©, as edited)

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#### 3. PROPOSED DEVELOPMENT

As a result of previous land use approvals (never implemented) the site retains a split zoning, which includes "Agriculture Zone I", "Business Zone Business Zone I" and "General Residential Zone IV" in terms of the George Integrated Zoning Scheme, 2017. According to information made available the proposal is to consolidate the three properties and rezone/ subdivide the newly-created portion to a subdivisional area to make provision for eight light industrial erven (Industrial Zone I), ancillary services (Utility Zone) and a private road reserve (Transport Zone III) as outlined in the table below. The conceptual site development plan is attached as **Annexure 3** to this report.

Portion No.	Extent (m²)	Proposed Zoning
1	20,070	Industrial Zone I
2	7,906	Industrial Zone I
3	6,063	Industrial Zone I
4	5,519	Industrial Zone I
5	6,479	Industrial Zone I
6	5,015	Industrial Zone I
7	5,404	Industrial Zone I
8	9,157	Industrial Zone I
9	150	Utility Zone
10	37,493	Transport Zone III

#### 4. SPATIAL PLANNING CONTEXT

# 4.1 George Municipal Spatial Development Framework, 2019

According to the George MSDF the site forms part of the "Western/ Gwayang Industrial Node", which is described as a, "Sub-regional industrial node in proximity to the N2 and airport, targeted at Southern Cape manufacturing, freight and logistics, and service industries." (MSDF, 2019: 37). The MSDF furthermore mentions the "Airport Support Area" (Figure 4) referred to in the Gwayang/ George Airport Corridor LSDF, 2015 and states that this area, "is not intended as a location for urban expansion but for the uses ancillary to and supportive of the airport's functionality and the convenience of users of the airport" (MSDF, 2019: 57).

The MSDF furthermore states that, "Development of the George Airport precinct is supported in so far as it relates to the development of uses ancillary to the airport's operations and should not include activities

already well catered for in the built footprint of the George urban area. An airport support area is identified in this MSDF. Tourism commercial uses of a rural nature are supported in keeping with the rural landscape along the road connecting the airport to the George city area, as set out in more detail in the Gwayang LSDF" (MSDF, 2019: 98).

**Figure 4:** Location of the site within proximity of Airport Support Zone as transposed onto extract from the George MSDF, 2019 (as edited)



The proposal therefore appears to be consistent with the spatial policies and objectives contained in the George MSDF, 2019.

#### 4.2 Gwayang Local Spatial Development Framework, 2015

According to this Local SDF the entire site is situated within the Airport Support Zone (highlighted in dark blue, **Figure 5** below), within which land uses focussing on supporting tourists and airport facilities that cannot practically be accommodated within the town, may be permitted. The Gwayang Local Spatial Development Framework identifies a new sub-regional industrial node in proximity to the N2 and airport, targeted at Southern Cape manufacturing, freight and logistics, and service industries.



The proposal appears to be consistent with the above spatial principles and planning objectives, though this aspect will be considered by the relevant planning authority in due course.

#### 5. BASIC HISTORIC BACKGROUND

Historical background research focussed on relevant primary sources obtained in the George Museum Archives as well as other primary and secondary sources. From a colonial perspective the farm Gwayang 208 was originally surveyed in 1910 (S.G. Diagram 1474/1910) and extended from both the Pacaltsdorp and George commonages to the east, covering an area of 1,980 morgen 520 sq. roods (±1,774 ha) (see **Figure 6**). The farm was granted to Adriaan H Stander "and fifteen others" during April 1911<sup>1</sup>. The portion of land presently known as portion 4 of the farm Gwayang is indicated as having been transferred to JC Barnard during June 1912<sup>2</sup>. This portion was however only formally surveyed in 1945.

Basic analysis of early (1939) aerial photography provides insight into traditional (Pre-Modern) landscape patterns, and therefore also early land use, within this area (**Figure 7**). From this the property and its environs formed part of a rural cultural landscape characterised predominantly by agricultural land use (cultivated fields, pastures, modest farmsteads, various roads traversing the landscape). River corridors are evident.

The imagery, which predates construction of the George Airport, shows the area being traversed by two primary gravel roads, namely the old George – Great Brak River road, (the alignment of which remains unchanged along an east-west axis), as well as the former road between Blanco and Herold's Bay (north-south axis), the alignment of which was altered with construction of the airport.

Though several farmsteads are noted within its proximity none are evident within the site boundaries or its direct environs. Save for river corridors the landscape had already been transformed through extensive agriculture/ cultivation by this period (1939). A portion of densely vegetation land along the former alignment of the R404 occur directly west of the site. It is evident that the site had also been transformed through agriculture/ cultivation by this period as attested by the pattern of ploughing evident in the image.

As such the likelihood of the site yielding archaeological occurrences or finds that may contribute meaningfully to the broader archaeological record is considered very low.

<sup>&</sup>lt;sup>1</sup> SG Diagram 1156/1911

<sup>&</sup>lt;sup>2</sup> SG Diagram 5385/45



Figure 6: Location of early farm Gwayang, 1900 SG Mapping for the Outeniqualand (George Museum Archives)



Figure 7: Site boundary transposed onto 1939 aerial image. (Aerial survey 140 of 1939, Flight strip 36, Image 34066, NGSI)

Basic historical background research did not identify or highlight any other significant heritage-related aspects related to this particular portion of land. It is unlikely that detailed archival research would provide further meaningful insight into former use and/or broader understanding of heritage-related themes of the area.

#### 6. HERITAGE RESOURCES AND ISSUES

From broader archival research it is known that early (colonial) occupation of this landscape occurred well before formal surveying of the original farm Gwayang in 1910 as early lands grants date back to the late 18<sup>th</sup> century. This site therefore forms part of a former rural landscape that has been subject to transformation through large-scale extensive agriculture/ cultivation over an extended period of time. From an archaeological perspective, the likelihood of the area presenting opportunities for significant archaeological occurrences is therefore considered very low. No historic structures, ruins or graveyards were noted during fieldwork or are known to occur on or within the direct proximity of the site.

It is unclear whether the proposed development would incorporate and retain the row of predominantly semimature indigenous yellowwood trees along the southwest site boundary bound by the R404, directly opposite the main entrance to the George Airport (Figure 3). These trees are situated within the road reserve (i.e. outside the subject site boundary) and likely to have been planted in the late 1970's to coincide with completion of the George Airport, formerly known as the PW Botha Airport in 1977. Said treerow appears to have been addressed in DEADP's Environmental Authorisation (EA) pertaining to the George Airport roads master plan dated 4<sup>th</sup> May 2021 (**Annexure 4**), condition 22 of which states as below. (Condition 26 of the EA deals with other potential heritage resources within the context of the roads master plan):

"Should the row of Yellowwood trees be removed or trimmed, the relevant permit must be obtained from the Forestry Section of the Department of Forestry, Fisheries and the Environment (DEFF)."

As discussed the site is situated within close proximity to the established George Airport falls within an area designated as an Airport Support Zone in the Gwayang Local Spatial Development Framework, 2015 within which land uses focussing on supporting tourists and airport facilities that cannot practically be accommodated within the town, may be permitted. The proposal would be consistent these spatial policies and objectives.

Existing land use rights applicable to the site following from previous environmental and land use applications during 2005, 2007 and 2008 include *inter alia* a hotel, place of entertainment, a service station, tourism facilities (restaurant, mini brewery, museum, market stalls, gift shop and theatre) etc. The current proposal is for amendment of these permissions to allow for land uses more consistent with that envisaged through subsequent municipal spatial policies and objectives for this area, as outlined in more detail in Section 4 of this report.

From our records<sup>3</sup> several urban developments associated with the Airport Support Zone have already been

approved by HWC including the following (Attached as part of **Annexure 5**):

Date	HWC Case No	Development Description	Properties
31st May 2012	X120531ZS48M	Proposed Service Station and Hotel	Gwayang 208/78, 82, 84
14 <sup>th</sup> November 2017	17102302WD1025E	Proposed Filling Station	Gwayang 208/4
10th February 2020	19110610AS0127E	Proposed Airport Access Roads	Gwayang 208/37, 84, 73, 74, 60, 53, 4,
			34, 78, 83, 110 & Remainder

According to the SAHRIS Paleo-sensitivity mapping<sup>4</sup> the entire property and environs are marked as Grey and described as being of no paleo-sensitivity thus requiring "no palaeontological studies".

Following from the above assessment it is therefore our view that no future heritage-related studies are warranted in this instance and that the development may proceed.

#### 7. RECOMMENDATION

Having regard to the above assessment it is our view that the proposed development would not impact on heritage resources considered of cultural significance; that the study area has been transformed significantly in the past and that the proposal would be consistent with the spatial proposals and objectives contained in the Gwayang Local SDF (2015). It is therefore recommended that no future heritage-related studies be required in this instance and that the development may proceed.

**PERCEPTION Planning** 

18th October 2021

STEFAN DE KOCK

Hons: TRP(SA) EIA Mgmt(IRL) Pr PIn PHP

<sup>&</sup>lt;sup>3</sup> List not necessarily comprehensive

<sup>&</sup>lt;sup>4</sup> https://sahris.sahra.org.za/map/palaeo, accessed 13th September 2021