

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

Heritage Western Cape Reference No: To be completed by the applicant

2110 2706

# 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: Image: 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: Image: This development will not require a NEMA application.

#### **B. BASIC DETAILS**

#### **PROPERTY DETAILS:**

Name of property: Arch Rock 296/5 (Keurbooms	strand), Knysna District and Bitou Municipality
Street address or location (eg: off R44): Read Road	d (off Main Street), Keurboomstrand
Erf or farm number/s: <b>As stated above</b>	Coordinates: S 34º 00' 11.28" E 23º 27' 42.82"
Town or District: Plettenberg Bay	Municipality: Bitou Municipality
Extent of property: <b>4,619m</b> <sup>2</sup>	Current use: <b>Resort</b>
Predominant land use/s of surrounding properties: Residential, Resorts, Nature Reserve, Agriculture	

#### **REGISTERED OWNER OF PROPERTY:**

Name and Surname: Keurbooms Rock (Pty) Ltd (Proxy held by IT de Waal)			
Address c/o Babylonstoren (Pty) Ltd, P O Box 167, Simondium, 7670			
Telephone N/A	Cell N/A	E-mail <b>N/A</b>	
APPLICANT/ AUTHORISED AGENT:			
Name and Surname: Perception Plann	ing (Stéfan de Kock) (see Po	wer of Attorney attached)	
Address: PO Box 9995, George, 6530	Address: PO Box 9995, George, 6530		
Telephone N/A	Cell 082 568 4719	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.			
Signature of Owner:	Date:		
(Power of Attorney, Proxy attached – Annexure 1)			
Signature of Applicant/ Authorised Agen	t: Date:		

27th October 2021

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

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#### C. DEVELOPMENT DETAILS:

Please indicate below which of the following Sections of the National Heritage Resources Act, or other legislation has triggered the need for notification of intent to develop.		
	\$38(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 -
	\$38(1)(b) Construction of a bridge or similar structure exceeding 50m in length.	(i) exceeding $5000$ m <sup>2</sup> 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:	(iii) involving three or more erven or divisions thereof which have been consolidated within the past five years.
	Need for heritage-related baseline study required by DEADP through NEMA EIA Process currently underway (i.e. DEADP Screening Tool)	If you have checked any of the three boxes above, describe how the proposed development will change the character of the site: Please refer to Section 1.1 of the Background Information Document (BID) for 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: <b>DEADP, Bitou Municipality</b>		
Present phase at which the process with that authority stands: <b>NEMA process underway/ Land use</b> application to be initiated		
Provide a <u>full</u> description of the nature and extent of the proposed development or activity including its potential impacts:		
<ul> <li>According to the Site Development Plan, Ground Floor Plans and 3D rendering compiled by Malherbe Rust Architects (Annexure 3 to the BID), the proposal is for demolition of the existing ten accommodation units and redevelopment as described below:</li> <li>5 x one bedroom units (±81m<sup>2</sup>);</li> <li>3 x two bedroom units (±90m<sup>2</sup>);</li> <li>Existing reception building to be converted to a laundry;</li> <li>New pool room and storeroom (±45m<sup>2</sup>);</li> <li>Reception and administration building (±60m<sup>2</sup>);</li> <li>8 x parking bays.</li> </ul>		

Estimated value cost of the project in South African Rands: R\_\_\_Unknown at this stage\_\_\_

#### D. ANTICIPATED IMPACTS ON HERITAGE RESOURCES

Section 3 of the National Heritage Resources Act sets out the following categories of heritage resource as forming part of the national estate. Please indicate the known presence of any of these by checking the box alongside and then providing a description of each occurrence, including nature, location, size, type

Failure to provide sufficient detail or to anticipate the likely presence of heritage resources on the site may lead to a request for more detailed specialist information.

Provide a short history of the site and its environs (Include sources where available):

#### Keurboomstrand:

From a colonial perspective, the coastal village of Keurboomstrand was developed on the early farm Matjiesrivier originally granted in quitrent to Jacobus Christoffel Jerling in 1851<sup>1</sup>. The extent of Matjesrivier is recorded as having been 465 morgen. The quitrent deed describes the land parcel as "A certain piece of Crown Forest Land", implying that the land was covered with a certain amount of indigenous forest at that time.

In 1867 the farm Matjesrivier was transferred jointly to Ignatious William Read and James Petrus Cornelis Read, descendants of whom developed the village named Keurboomstrand when 144 morgen was alienated for the purpose of developing the "township" Keurboomstrand. The entire portion was named "Rust Klip". After the death of both I W and J P C Read, the entire farm Matjes Rivier was subdivided and bequeathed to their various children. The village, initially consisting of 138 lots, was established along the coastline of the farm during 1926. The grid layout provided for two public open spaces (comprising five lots), a school site and 132 residential erven.

Subdivided from the early farm Matjiesrivier in 1927, thus just a year after the establishment of the village Keurboomstrand, the farm Arch Rock 296 originally measured 95 morgen 240 square roods (±105.6676 ha) and was registered to JWO Read on 16<sup>th</sup> November 1927<sup>2</sup>. A series of subdivisions followed until framing of the subject property in its present form during 1993. According to deeds office records ownership of the farm Arch Rock (and thus the subject property) remained with the Read family right up until its purchase and transfer to the current landowner on 29<sup>th</sup> May 2019.

#### Arch Rock 296:

Five lease areas, each aligned with the location of the respective cottages, were registered with the SG Office during the course of 1999<sup>3</sup> but never registered in the Deeds Office. Proof that approval for said lease areas were provided by the planning authority in terms of Section 25 of the Land Use Planning Ordinance (Ord. 15 of 1985) could not be sourced.

Within the context of the proposal, basic historic background research pertaining to the property did however not highlight any pertinent heritage issues or themes that may warrant further archival research.

Please indicate which heritage resources exist on the site and in its environs, describe them and indicate the nature of any impact upon them:

<sup>&</sup>lt;sup>1</sup> Cape Town Deeds Office (CTDO) George Quitrents II folio 82 dated 27<sup>th</sup> December 1851

<sup>&</sup>lt;sup>2</sup> \$G Diagram 3621/48

<sup>&</sup>lt;sup>3</sup> SG Diagrams 3986, 3987, 3988, 3989 & 3990/1999

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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:	
Archaeological resources (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:	
Graves and burial grounds (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: Coastal landscape setting: local vernacular architecture
	Description of impact on heritage resource: <b>Unknown</b>
Describe elements in the environs of the site that could be deemed to be heritage resources:	
Coastal landscape setting	
Description of impacts on heritage resources in the environs of the site:	
Unknown	

#### Summary of anticipated impacts on heritage resources:

#### Please refer to BID for comprehensive description.

#### E. ILLUSTRATIVE MATERIAL:

Attach to this form a minimum A4 sized locality plan showing the boundaries of the area affected by the proposed development, its environs, property boundaries and a scale. The plan must be of a scale and size that is appropriate to creating a clear understanding of the development.

Attach also other relevant graphic material such as maps, site plans, satellite photographs and photographs of the site and the heritage resources on it and in its environs. These are essential to the processing of this notification.

Please provide all graphic material on paper of appropriate size and on CD/ USB in JPEG format. It is essential that graphic material be annotated via titles on the photographs, map names and numbers, names of files and/or provision of a numbered list describing what is visible in each image.

F.	RECOMMENDATION

In your opinion do you believe that a heritage impact assessment is required?

Recommendation made by:

Name Stéfan de Kock

### Capacity Professional Heritage Practitioner (APHP)

**PLEASE NOTE:** No Heritage Impact Assessment should be submitted with this form or conducted until Heritage Western Cape has expressed its opinion on the need for such and the nature thereof.

# G. INFORMATION TO BE PROVIDED AND STUDIES TO BE CONDUCTED AS PART OF THE HERITAGE IMPACT ASSESSMENT (HIA)

If it is recommended that an HIA is required, please complete this section of the form.

## DETAILS OF STUDIES 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:
<b>PLEASE NOTE:</b> Any further studies which Heritage Western Cape requires should be submitted must be in the form of a single, consolidated report with a single set of recommendations. Specialist studies must be incorporated in full, either as chapters of the report, or as annexures 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)

#### 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)

ARCH ROCK 296/5 (KEURBOOMSTRAND), KNYSNA DISTRICT AND BITOU MUNICIPALITY



#### ON BEHALF OF: Keurbooms Rock (Pty) Ltd

October 2021

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## **PERCEPTION Planning**

URBAN & REGIONAL PLANNING- ENVIRONMENTAL PLANNING- HERITAGE IMPACT ASSESSMENT- URBAN DESIGN

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- 5. Extract Draft BMSDF, 2020
- 6. Extract KLASP, 2013
- 7. 1880-1890 SG Mapping
- 8. Matjiesrivier SG Diagram 1927
- 9. Keurboomstrand village layout 1927
- 10. SAHRIS paleo-mapping

#### **REFERENCES and ACKNOWLEDGEMENTS**

- 1. Cape Town Archives
- 2. George Museum Archives
- 3. Kathleen Schulz, Southern Cape Historian
- 4. Surveyor General Office
- 5. Application for amendment of an approved condition of approval (site development plan): Portion 5 of Farm 296 Bitou Municipality, Emile van der Merwe Town Planning Consultants, undated.

#### ABBREVIATIONS

- 1. NGSI National Geo-Spatial Information, Department of Rural Development and Land Reform, Mowbray
- 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

COVER: Collage of photographs of the property (Author, 2021)

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#### 1. INTRODUCTION

PERCEPTION Planning was appointed by IT de Waal (SA Id. 7106245266083) on behalf of Keurbooms Rock (Pty) Ltd (being the registered property owner), to submit to Heritage Western Cape (HWC) a Notice of Intent to Develop (NID) to 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 property. The Power of Attorney, Proxy and copies of the relevant Title Deed and S.G Diagram are attached as part of **Annexure 1**.

The cadastral land unit subject to this application is as follows:

Remainder of Portion 5 of the farm Arch Rock 296, Keurboomstrand measuring 4,619m<sup>2</sup>, registered to Keurbooms Rock (Pty) Ltd, held under Title Deed T 47640/2019 and situated within the jurisdiction of Knysna District and Bitou Municipality, Western Cape.

#### 1.1 Background

This report follows as response to the results of a DEA&DP Screening Tool which identified potential heritagerelated sensitivities pertinent to the property. This application is therefore hereby submitted to Heritage Western Cape for comment within the context of "other triggers", in this instance being the National Environmental Management Act (Act 107 of 1998 as amended).

#### 2. BRIEF DESCRIPTION OF STUDY AREA

The subject property is situated within the coastal village of Keurboomstrand, ±10km<sup>1</sup> northeast of the Plettenberg Bay central business area and ±9,4km west of the neighbouring coastal hamlet Nature's Valley (**Figure 1**). The site is located at the eastern end of Main Street. Vehicular access is via a servitude right of way (Read Road) originating at the eastern boundary of main public parking and main beach areas.



Figure 1: Study area location within a broader context (Google Earth, 2021, as edited)

The property forms part of a gentle south-facing platform which would have been levelled and largely transformed during the establishment of Keurboomstrand during the 1920's as discussed in Section 5 below. The property contains ten resort accommodation units in varied architectural styles and constructed from different materials, loosely orientated across the site. Existing buildings furthermore include a small outbuilding with lean-to (laundry room) along the western boundary and a small office building on the northernmost

<sup>&</sup>lt;sup>1</sup> Direct line of sight

portion of the property, directly north of the servitude right of way. From field work undertaken on 30<sup>th</sup> September 2021 it was evident that none of the aforementioned structures are older than 60 years.



Figure 2: Property shown within context of Keurboomstrand village (Google Earth, 2021, as edited)



Figure 3: Property shown within context of coastline and direct environs (Google Earth, 2021, as edited)

Due to the occurrence of mature predominantly indigenous trees and shrubs throughout the property few vacant spaces remain. A gravel access road running parallel to the eastern cadastral boundary extends from the servitude right of way to the rear of three south-facing accommodation units with frontage onto the beach.

Existing land use within the proximity of the property includes public parking, ablution, and associated facilities as well as a restaurant/ accommodation to the west and the Arch Rock Resort (camping site/ accommodation) directly to the west. The village is characterised predominantly by single residential land use interspersed by small-scale private tourism accommodation facilities. Photographs of the site, together with contextual imagery of its direct environs are attached as part of **Annexure 2** to this report.

#### 3. PROPOSED DEVELOPMENT

From information available, building plans for development of the existing ten cottages situated on the property were approved the former Plettenberg Bay Municipality on 18<sup>th</sup> February 2003. This approval coincided with an environmental approval by the Department of Environmental Affairs & Development Planning dated 31<sup>st</sup> March 2003.

According to the Site Development Plan, Ground Floor Plans and 3D rendering compiled by Malherbe Rust Architects (Annexure 3), the proposal is for demolition of the existing ten accommodation units and redevelopment as described below:

- 5 x one bedroom units (±81m<sup>2</sup>);
- 3 x two bedroom units (±90m<sup>2</sup>);
- Existing reception building to be converted to a laundry;
- New pool room and storeroom (±45m<sup>2</sup>);
- Reception and administration building (±60m<sup>2</sup>);
- 8 x parking bays.

The planning report records the total proposed development footprint as 1,052m<sup>2</sup> and the existing development footprint as 992m<sup>2</sup>, thus relating to an increased footprint of 130m<sup>2</sup>. The land use planning application, submitted to the relevant planning authority in terms of Section 15(2)(h) of the Bitou Municipality Bylaw on Land Use Planning is for amendment of an approved condition of approval (i.e. the 2003 Site Development Plan) applicable to the subject property. The planning report furthermore describes the proposed development concept as follows (*sic*):

"The design and architectural framework for re-layout and improvement draws inspiration from modest traditional single storeyed cottages arranged around the landscape to create a landscaped courtyard between buildings. The proposed buildings will have 45 degree non reflective corrugated roofs, white rolled roof ridges, white lime washed walls and gables, timber pergolas with vines on and stone chipped flat roofs as linking elements.

Simplistic rectangular in layout and placed within the current arrangement of trees ultimately creating a closely linked experience between outside and inside living. The overall unit's proportion of roof to wall is 1:1. This allows for a simplistic gable and articulation traditional to vernacular typologies. Timber screening walls, which will naturally weather inti a soft greyish tone will be utilizing the existing placement the new units integrate with the current landscaping's sense of place.

A pedestrian orientated user experience is encouraged and cars will be parked at a central parking area at the entrance to the development."

The architectural typology presented appears to include design elements akin to traditional West Coast or Overberg vernacular architecture.

#### 4. SPATIAL PLANNING CONTEXT

#### 4.1 Bitou Municipal Spatial Development Framework, 2017

The BMSDF (Keurbooms River Draft SDF) (Figure 4) does not contain site-specific spatial proposals for the subject properties other than highlighting its location within an existing urban area and inside the urban edge.

General notes relating to urban development within this area include:

- "All development in this area would have to be subject to strict urban design, architectural and land use guidelines;
- High income housing/market housing to be promoted." (BMSDF, 2017:276)

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Figure 4: Property within context of the BMSDF (BM, 2017)

Figure 5: Property within context of the Draft BMSDF (BM, 2020)

#### 4.2 Draft Bitou Municipal Spatial Development Framework, 2020

The Draft BMSDF does not contain specific spatial proposals pertaining to property other than highlighting the subject property as "residential" (Figure 5). The Draft BMSDF refers to the Keurbooms Local Area Structure Plan (refer to 5.3 below) and defines the development rationale as follows:

"A strong holiday/resort character predominates the area. It is fairly homogenously developed with residential and resort uses, wedged between sea and coastal plateau slopes. Altering its character by permitting commercial and other non-residential development could detract from the area's attraction. The theme should thus be a low density residential one." (Draft BMSDF, 2020:127)

A lower order business node ("B3") is proposed at the far eastern end of Main Street, directly west of the property, where some business and tourism orientated uses already exist.

#### 4.3 Keurbooms & Environs Local Area Structure Plan, 2013 (KLASP)



#### **BRIEF HISTORIC BACKGROUND** 5.

Historical background research focussed on relevant primary sources obtained in the Cape Town Archives, Deeds Office as well as other primary and secondary sources.

2013)

the

#### 5.1 Early establishment of Keurboomstrand

The coastal village of Keurboomstrand was developed on the early farm Matjiesrivier originally granted in quitrent to Jacobus Christoffel Jerling in 1851<sup>2</sup>. The extent of Matjesrivier is recorded as having been 465 morgen. The quitrent deed describes the land parcel as "A certain piece of Crown Forest Land", implying that the land was covered with a certain amount of indigenous forest at that time. **Figure 7** shows the location of the early farm in relation to the village Formosa (Plettenberg Bay) as transposed onto early (1880-1890) Surveyor General mapping for the area.



Figure 7: Early farm Matjesrivier in relation to the village of Formosa, transposed onto early (1880-1890) SG Mapping of the area (NGSI as edited)

In 1867 the farm Matjesrivier was transferred jointly to Ignatious William Read and James Petrus Cornelis Read, descendants of whom developed the village named Keurboomstrand when 144 morgen was alienated for the purpose of developing the "township" Keurboomstrand. The entire portion was named "Rust Klip". After the death of both I W and J P C Read, the entire farm Matjes Rivier was subdivided and bequeathed to their various children. The village, initially consisting of 138 lots, was established along the coastline of the farm during 1926. The grid layout provided for two public open spaces (comprising five lots), a school site and 132 residential erven.

#### 5.2 Arch Rock 296

Subdivided from the early farm Matjiesrivier in 1927, thus just a year after the establishment of the village Keurboomstrand, the farm Arch Rock 296 originally measured 95 morgen 240 square roods (±105.6676 ha) and was registered to JWO Read on 16<sup>th</sup> November 1927<sup>3</sup>. A series of subdivisions followed until framing of the subject property in its present form during 1993. According to deeds office records ownership of the farm Arch Rock (and thus the subject property) remained with the Read family right up until its purchase and transfer to the current landowner on 29<sup>th</sup> May 2019.

Five lease areas, each aligned with the location of the respective cottages, were registered with the SG Office during the course of 1999<sup>4</sup> but never registered in the Deeds Office. Proof that approval for said lease areas were provided by the planning authority in terms of Section 25 of the Land Use Planning Ordinance (Ord. 15 of 1985) could not be sourced.

Within the context of the proposal, basic historic background research pertaining to the property did however not highlight any pertinent heritage issues or themes that may warrant further archival research.

<sup>&</sup>lt;sup>2</sup> Cape Town Deeds Office (CTDO) George Quitrents II folio 82 dated 27<sup>th</sup> December 1851

<sup>&</sup>lt;sup>3</sup> SG Diagram 3621/48

<sup>&</sup>lt;sup>4</sup> SG Diagrams 3986, 3987, 3988, 3989 & 3990/1999



Figure 9: Approximate location of the property transposed onto the earliest (1927) layout for Keurboomstrand (NGSI as edited)

#### 6. HERITAGE RESOURCES AND ISSUES

Vastly different from the undeveloped, natural landscape within which is found the Matjesrivier PHS, ±900m to the east, the subject property forms part of an urbanised area (albeit with low density character) which had been physically transformed through establishment of the Keurboomstrand village during the 1920's. Works associated with this transformation would have included, *inter alia*, earthworks, construction of roads,

10.7.

installation of services. Furthermore, more recent works on the property included construction of ten cottages, outbuilding and office, access road and associated circulation space. The proposal would mostly make use of existing built footprints to retain mature trees and cause as little disturbance as possible. From an archaeological perspective, therefore the likelihood of the property presenting opportunities for significant archaeological occurrences is therefore considered very low.

According to the SAHRIS Paleosensitivity mapping<sup>5</sup> the largest portion of the property is marked as Green and described as being of moderate paleosensitivity thus requiring a desktop study. A small portion of the property (**Figure 10**) is marked as Blue, described as being of low palaeontological significance and requiring "no palaeontological studies although a protocol for finds is required".



Figure 10: Property boundaries transposed onto extract from SAHRIS paleo-sensitivity mapping for the area (SAHRIS 2021 as edited)

Given the long-standing transformed nature of the property as well as the intention to rebuild new units on existing built platforms, it is suggested that no further palaeontological studies be required in this instance but that a protocol for fossil finds be but in place during the construction phase.

Unfortunately available historic aerial imagery series (1936, 1966, 1974, 1980, 1991) are of insufficient resolution to provide insight into former land use on and within the proximity of the property. The property does not contain any structures older than 60 years/ structures considered of cultural significance. The proposal would essentially be focussed on existing built footprints, be for less units (albeit an 130m<sup>2</sup> increase in the overall building footprint). Taken in conjunction with the above assessment we are therefore of the view that the proposal would not materially impact on heritage resources of cultural significance and that the development may proceed.

#### 7. **RECOMMENDATION**

That Heritage Western Cape decide whether, based on the assessment above, the proposal would impact on any heritage resource of cultural significance and consequently whether further heritage-related studies would be warranted in this instance.

#### **PERCEPTION Planning**

27th October 2021

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

<sup>&</sup>lt;sup>5</sup> <u>https://sahris.sahra.org.za/map/palaeo</u>, accessed 8<sup>th</sup> October 2021