

**DRAFT VERSION – FOR PUBLIC PARTICIPATION ONLY**

**INTEGRATED HERITAGE IMPACT ASSESSMENT IN TERMS OF SECTION 38 OF THE NATIONAL HERITAGE RESOURCES ACT, 1999 (ACT 25 OF 1999): PROPOSED DEVELOPMENT OF BOUTIQUE HOTEL ON ERVEN 19324, 19325 & 19326 (PINNACLE POINT), MOSSEL BAY MUNICIPALITY & DIVISION**



**On behalf of: The Dumakanda Residence Trust**

**MARCH 2021**

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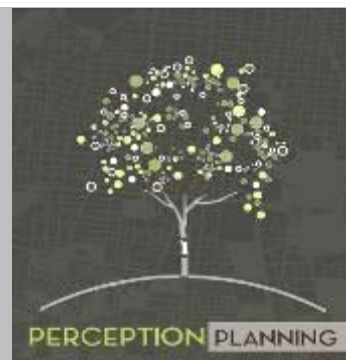
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**PERCEPTION Planning**

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

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**ABBREVIATIONS:**

ACMP – Archaeological Conservation Management Plan  
 AIA – Archaeological Impact Assessment  
 APM – Archaeology, Palaeontology and Meteorites Committee of Heritage Western Cape  
 CapeEAPrac – Cape Environmental Assessment Practitioners (Pty) Ltd  
 CSBT – Cape St Blaize Trail  
 DCAS – Department of Cultural Affairs and Sport (WCG)  
 DEA&DP – Department of Environmental Affairs and Development Planning (WCG)  
 EA – Environmental Authorisation  
 ECO - Environmental Control Officer  
 ELC – Environmental Liaison Committee  
 EMPr – Environmental Management Programme Report  
 ESA – Early Stone Age  
 HIA – Heritage Impact Assessment  
 HWC – Heritage Western Cape  
 ICMP – Integrated Conservation Management Plan  
 Ka/kyr – Thousand years ago  
 LSA – Later Stone Age  
 MAP – Mossel Bay Archaeology Project  
 MIS – Marine Isotope Stage  
 MSA – Middle Stone Age  
 NGL – Natural Ground Level  
 NGSI – National Geo-Spatial Information, Department of Rural Development and Land Reform  
 NHRA – National Heritage Resources Act, 1999 (Act 25 of 1999)  
 NID – Notice of Intent to Develop  
 OSL – Optically Stimulated Luminescence  
 OUV – Outstanding Universal Value  
 PCL – Prehistoric Cultural Landscape  
 PHS – Provincial Heritage Site  
 PPSC PHS – Pinnacle Point Site Complex Provincial Heritage Site (as gazetted in Provincial Gazette No 7075 dated 14<sup>th</sup> December 2012)  
 PPSMC – Pinnacle Point Shell Midden Complex  
 RoD – Record of Decision  
 SACPA – South African Palaeoclimate, Palaeoenvironment, Palaeoecology, Palae-anthropology Trust  
 SAHRA – South African Heritage Resources Agency  
 SAHRIS – South African Heritage Resources Information System  
 TMS – Table Mountain Sandstone  
 WCG – Western Cape Government  
 WHS – World Heritage Site

**COVER:** Collage of images taken and compiled by the author.



## 1. INTRODUCTION

PERCEPTION Planning was appointed by Mr. Deon de Villiers on behalf of The Dumakanda Residence Trust (the registered land owner) to compile and submit to Heritage Western Cape (HWC), an Integrated Heritage Impact Assessment (HIA) as required with HWC's Interim comments dated 12<sup>th</sup> August 2019. A copy of the Power of Attorney, (signed by the representative of registered land owner), as well as copies of the relevant Title Deeds and General Plan are attached as part of **Annexure 1**.

The cadastral land units subject to this application are:

- Erf 19324 (Pinnacle Point), measuring 911m<sup>2</sup>, registered to The Dumakanda Residence Trust, held under Title Deed No. 71424/2016, situated within the jurisdiction of Mossel Bay District and Municipality;
- Erf 19325 (Pinnacle Point), measuring 896m<sup>2</sup>, registered to The Dumakanda Residence Trust, held under Title Deed No. 52363/2015, situated within the jurisdiction of Mossel Bay District and Municipality;
- Erf 19326 (Pinnacle Point), measuring 851m<sup>2</sup>, registered to The Dumakanda Residence Trust, held under Title Deed No. 65030/2016, situated within the jurisdiction of Mossel Bay District and Municipality.

### 1.1 **Brief background to administrative process**

During July 2019 Dr. Peter Nilssen was appointed by the representative of the registered property owner of Erven 19324, 19325 and 19326 (Pinnacle Point), Mossel Bay, namely Mr. Deon de Villiers on behalf of The Dumakanda Residence Trust, to submit to HWC a Notification of Intent to Develop (NID) in terms of Section 38 of the National Heritage Resources Act, 1999 (Act 25 of 1999) (NHRA) in respect of a proposal to redevelop said properties as a Boutique Hotel. The NID was submitted to HWC by Dr. Peter Nilssen on 18<sup>th</sup> July 2019.

In what appears to have been a request directed to HWC by Deon van Zyl Town planners to comment on a land use planning application (Proposed Rezoning, Permanent Departure and Consolidation) in respect of the subject properties, HWC on 24<sup>th</sup> June 2019 (**Annexure 2.1**) responded as follows [sic]:

*"Your request for comment in respect of the above rezoning dated 25 April 2019 refers.*

*Please be advised that the erven are located within the Pinnacle Point Provincial Heritage site, and as such a permit in terms of S. 27(18) of the National Heritage Resources Act, Act 25 of 1999, (the NHRA) is required prior to any rezoning being approved.*

*We await the permit application."*

HWC responded to the above NID application (HWC Ref. 19060606AS0726E) through their Interim Comments dated 12<sup>th</sup> August 2019 (**Annexure 2.2**) as follows [sic]:

*"You are hereby notified that, since there is reason to believe that the proposed development 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. This HIA must have specific reference to the following:*

- *Visual impacts on the cultural landscape (in particular the protected area containing the Pinnacle Point Provincial Heritage Sites);*

*The required HIA must have an integrated set of recommendations. The comments of relevant registered conservation bodies and the relevant Municipality must be requested and included in the HIA where provided. Proof of these requests must be supplied."*

The requirement outlined in HWC's correspondence dated 24<sup>th</sup> June 2019 has been addressed through further e-mail correspondence seeking further clarification given the locality of the subject erven outside the boundaries of the Pinnacle Point Site Complex Provincial Heritage Site (PPSC PHS) as also addressed elsewhere in this report<sup>1</sup>.

**This Integrated HIA report focusses on addressing the aspects mentioned in the Interim comment dated 12<sup>th</sup> August 2019 whilst adhering to the requirements specified in terms of Section 38(3) of the NHRA.**

## 2. DESCRIPTION OF THE STUDY AREA

The L-shaped site study area (2,658m<sup>2</sup> in extent) comprises three vacant cadastral land units forming part of the *Pinnacle Point Beach and Golf Resort*, situated ±8.5km southwest of the Mossel Bay historic town centre as indicated in the regional locality plan (**Figure 1**). The study area has direct curtilage onto Pinnacle Drive, with vehicular access negotiated along Mossel- and Spekboom Streets from the main estate entrance off Louis Fourie Drive.

<sup>1</sup> Galimberti, M., 2021. *Proposed Pinnacle Point Boutique Hotel (Erven 19324-19326), Mossel Bay.* [email].





Figure 1: Location of Study Area within broader urban context (Google Earth, 2020, as edited)

Existing development within the direct proximity includes the Pinnacle Point Golf Club House complex (±130m west), which also serves as entry/ starting point to the Point of Human Origins archaeological tours<sup>2</sup>. Extensive modern structures, understood to be six residential dwellings, are situated within a residential cul-de-sac, situated ±50m directly to the south. The site adjoins a paved parking area (constructed between May 2018 – November 2018) (Figure 2).

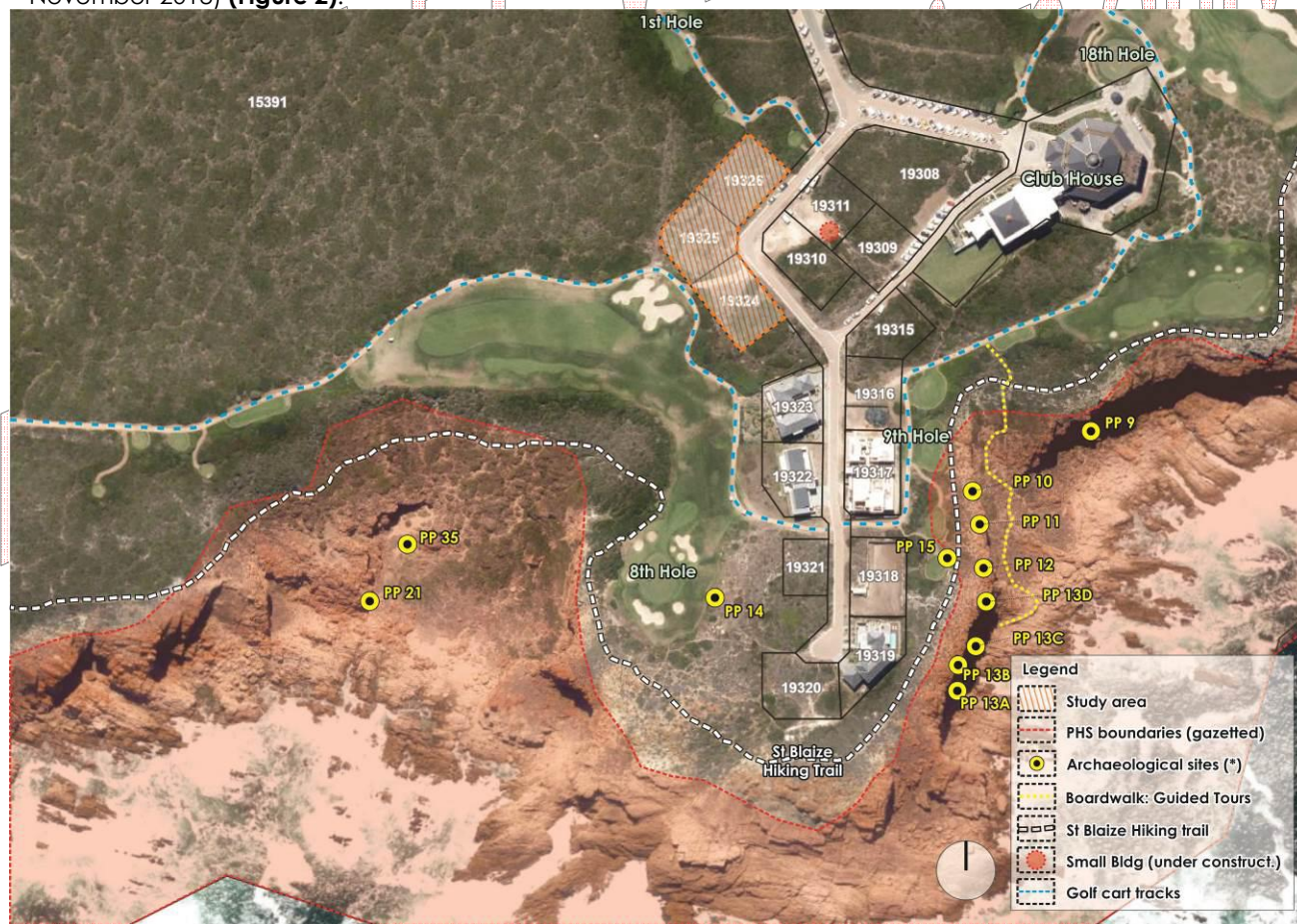


Figure 2: Study area in relation to the PPSC PHS boundaries, known archaeological occurrences<sup>3</sup> as well as existing buildings, golf course and related infrastructure within its direct proximity (Google Earth, 2020, as edited)

<sup>2</sup> <https://www.humanorigin.co.za/>, accessed 12<sup>th</sup> February 2021

<sup>3</sup> Approximate locations of known archaeological sites as per digital record provided by DCAS (Galimberti, 2021)



During field work undertaken on by both authors on 26<sup>th</sup> January 2021 it became evident that dumping of material originating from elsewhere has taken place across the study area. From the density and type of vegetation growth established across the site it would appear that said dumping did not occur recently but rather several years ago. A small structure under construction was noted on Erf 19311 along the periphery of said existing parking area. The study area is located between the 1<sup>st</sup> (north) and 8<sup>th</sup> (south) holes of the golf course and a number of paved golf cart tracks traverse the landscape within the direct proximity of the study area (**Figure 3**).



**Figure 3:** Close-up view, vegetation sparse in areas of former disturbance and dumping (MB GIS Viewer, 2020 as edited)

The study area is situated outside the PPSC PHS as gazetted in Provincial Gazette No 7075 dated 14<sup>th</sup> December 2012, though inside the agreed Buffer Area to said PHS (refer to 5.1, Figure 6). Photographs of the study area and environs are attached as part of **Annexure 3**.

### 3. HERITAGE STATUTORY FRAMEWORK

#### 3.1 Grading

References to grading as meant within the context of this Integrated Heritage Impact Assessment are based on the categories as prescribed by HWC<sup>4</sup> and summarised in Table 1 below. Gradings presented are (a) aimed at formulating responses with relation to the perceived provincial and/ or local cultural significance of heritage resources identified and (b) assigning the appropriate level of management responsibility applicable to such heritage resources.

Grading	Description of resource	Examples of possible Management Strategies	Cultural Significance
II	Heritage resources with special qualities which make them significant in the context of a province or region, but do not fulfil the criteria for Grade I status.	May be declared as a Provincial Heritage Site by HWC	Exceptionally High Significance
III A	Such a resource must be an excellent example of its kind or must be sufficiently rare. These are heritage resources which are significant in the context of an area.	This grading is applied to buildings and sites that have sufficient intrinsic significance to be regarded as local heritage resources; and are significant enough to warrant that any alteration, both internal and external, is regulated. Such buildings and sites may be representative, being excellent examples of their kind, or may be rare. In either case, they should receive maximum protection at local level.	High Significance

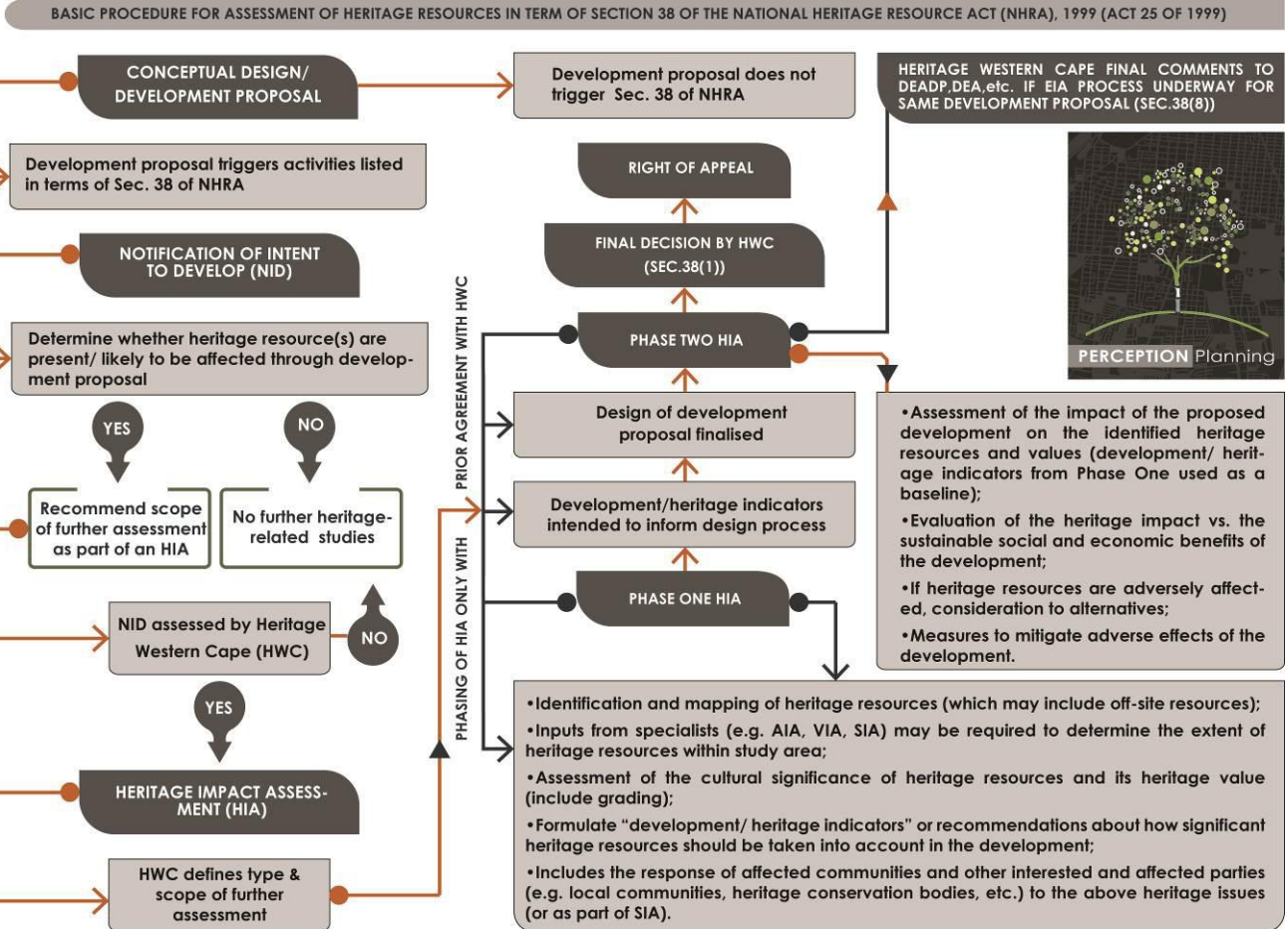
<sup>4</sup> Grading: Purpose and Management Implications, Heritage Western Cape, 16<sup>th</sup> March 2016

III B	Such a resource might have similar significances to those of a Grade III A resource, but to a lesser degree. These are heritage resources which are significant in the context of a townscape, neighbourhood, settlement or community.	Like Grade IIIA buildings and sites, such buildings and sites may be representative, being excellent examples of their kind, or may be rare, but less so than Grade IIIA examples. They would receive less stringent protection than Grade IIIA buildings and sites at local level.	Medium Significance
III C	Such a resource is of contributing significance to the environs. These are heritage resources which are significant in the context of a streetscape or direct neighbourhood.	This grading is applied to buildings and/or sites whose significance is contextual, i.e. in large part due to its contribution to the character or significance of the environs. These buildings and sites should, as a consequence, only be regulated if the significance of the environs is sufficient to warrant protective measures, regardless of whether the site falls within a Conservation or Heritage Area. Internal alterations should not necessarily be regulated.	Low Significance
NCW	A resource that, after appropriate investigation, has been determined to not have enough heritage significance to be retained as part of the National Estate.	No further actions under the NHRA are required. This must be motivated by the applicant and approved by the authority. Section 34 can even be lifted by HWC for structures in this category if they are older than 60 years.	No research potential or other significance

**Table 1:** Summary of grading and possible mgmt. strategies for Grade II and III heritage resources (Source: HWC, 2016)

**3.2 Methodology**

This Integrated HIA process is undertaken in terms of Section 38(8) of the NHRA and in accordance with relevant HWC policies and guidelines and international practice principles. A flow diagram illustrating a normal, non-retrospective HIA process pertaining to development being proposed is as shown in **Figure 4**.



**Figure 4:** Flowchart illustrating a typical HIA process in terms of Section 38 of the NHRA (Act 25 of 1999).

- Tasks undertaken during the compilation of this **Draft Integrated HIA** included, *inter alia*, the following:
- Liaise with project team including environmental assessment practitioner (CapeEAPrac), architect (Arté Architects), urban planner (Deon van Zyl Town Planners) as well as the local planning authority (Mr. Jaco Roux, Ms. Olga Louw);
  - E-mail communications (20-25 January 2021) with HWC seeking clarification regarding extent of the Pinnacle Point Site Complex PHS as gazetted 14<sup>th</sup> December 2012;
  - Various e-mail communications (January, February 2021) with DCAS (Dr. Mariagrazia Galimberti);
  - Clarify fact that study area situated outside PHS and that Section 27 of the NHRA therefore does not apply in this instance;
  - Field work undertaken jointly by the authors on 26<sup>th</sup> January 2021;



- Comprehensive research regarding establishment and current status of the PPSC PHS (access to HWC archives not possible due to Covid-19 related restrictions)
- Contextual analysis of the site and its direct environs, identification and mapping of spatial informants;
- Identification of possible heritage-related issues and concerns;
- Establishing cultural significance and recommending grading based on criteria set out in NHRA;
- Identification of heritage informants for decision making and input to the planning process;

The following actions are still to be undertaken pending a public participation process:

- Undertake focussed public participation process with registered conservation body, local planning authority and other stakeholders as requested by HWC in the Interim Response to the NID and in accordance with the HWC Public Consultation Guidelines, June 2019;
- Incorporate outcomes emanating from public participation process and formulate appropriate responses to comments received – include in Final Integrated HIA report;
- Submission of Final Integrated HIA to HWC.

## 4. PROPOSED DEVELOPMENT

### 4.1 Development description

The proposal is for development of Erven 19324, 19325 and 19326 (Pinnacle Point), Mossel Bay for the purposes of a boutique hotel comprising 31 bedrooms/ suites to be accommodated within a two-storey building over a basement level as illustrated through conceptual architectural floor plans, elevations, perspective renderings and sections attached as part of **Annexure 4**.

The proposal is described in further detail as follows:

*"The Development will comprise of a 2-storey (including a basement) with a development footprint of 60% and a total building area of 2,575m<sup>2</sup>, housing a Boutique Hotel with 31 bedrooms or suites, a restaurant/dining facility of 245,6m<sup>2</sup> and a conference area with a maximum of 70 seats. The restaurant and conference facilities will be related and ancillary to the Boutique Hotel and will not function independently from the Hotel. The building will have a maximum height of 10.5m and 2m building lines will be provided on all side boundaries and the street boundary. A total of 27 parking bays will be provided on site, of which 23 bays will be provided in the basement of the building (296,2m<sup>2</sup>)."*  
(Deon van Zyl Town Planners, 2019: 13)

### 4.2 Land use application

The land use planning application to be submitted to Mossel Bay Municipality for consideration in terms of Sections 15(2)(a), 15(2)(b) and 15(2)(e) of the Mossel Bay Municipality By-Law on Municipal Land Use Planning, 2015 will comprise the following components:

- Rezoning of three properties from "Single Residential Zone 1" to "General Residential Zone 5" to allow the development of a Boutique Hotel with a maximum of thirty-one (31) rooms on the site.
- Permanent Departure of the following standard conditions and restrictions as stipulated under Schedule 2 of the Mossel Bay Municipality Integrated Zoning Scheme By-Law, 2019:
  - Reduction of the parking requirements from 76 parking bays to 27 parking bays.
  - Amendments of building lines from 0m on all boundaries to 2m on all boundaries.
- Consolidation of Erven 19324, 19325 and 19326, Mossel Bay
- The development will be subject to the following development control mechanisms:
  - Height: maximum height 10.5m
  - Coverage: 70%
  - F.A.R.: 1,0
  - Building lines: 2m on all side boundaries and 2m on street boundary
  - Parking: 27 parking bays to be provided on site

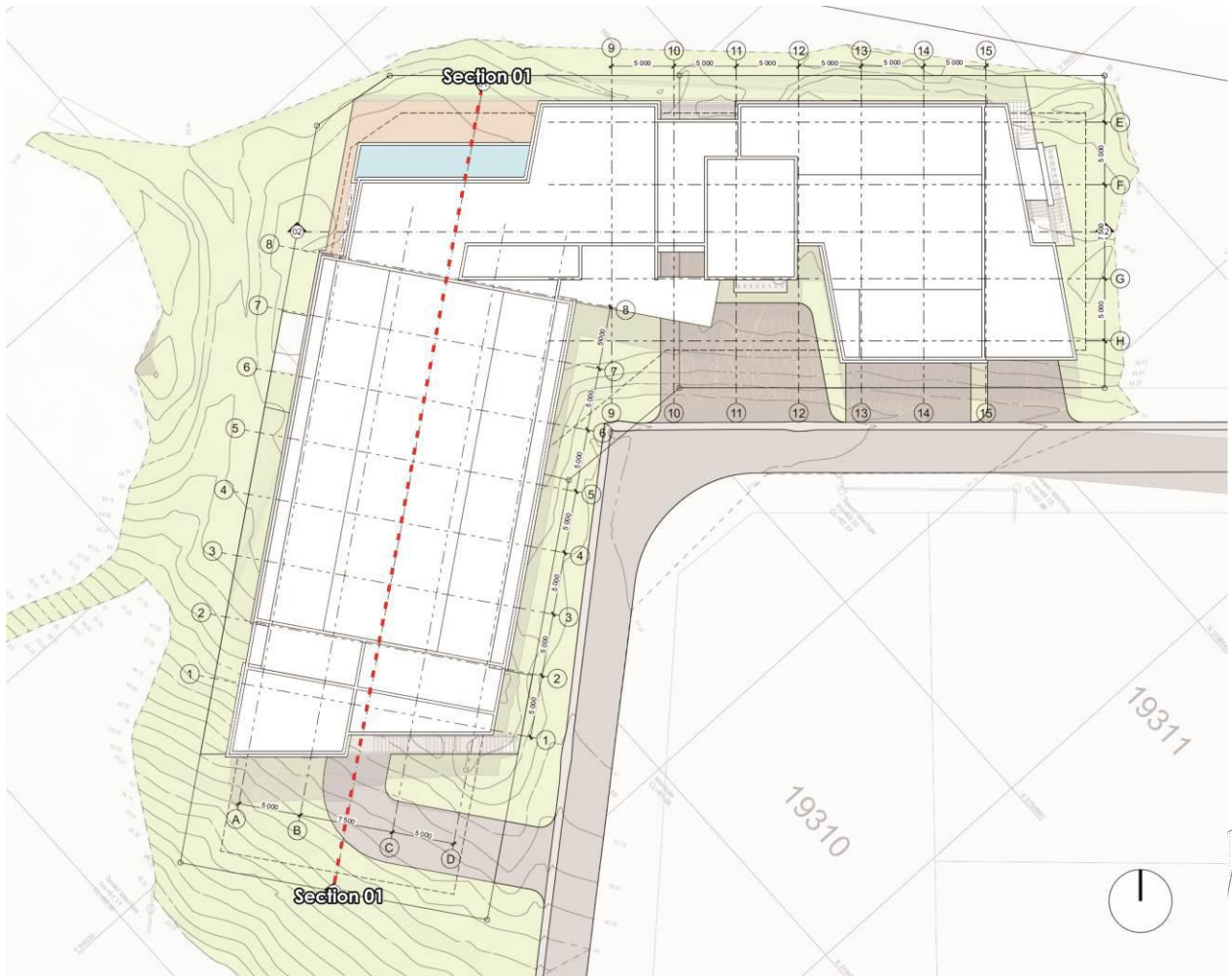
### 4.3 Architectural design

The modern architectural typology of the proposed building is similar to that of recently completed residences directly south of the study area and makes provision for a two-storeyed structure with a basement level with access from the southern (slightly lower-lying) portion of the study area (i.e. presently Erf 19324). According to conceptual architectural plans (Annexure 4) the total building footprint would be  $\pm 1,581\text{m}^2$ , thus translating to 59% coverage, which it understood to exclude exterior paved areas, driveways, etc (**Figure 5**).

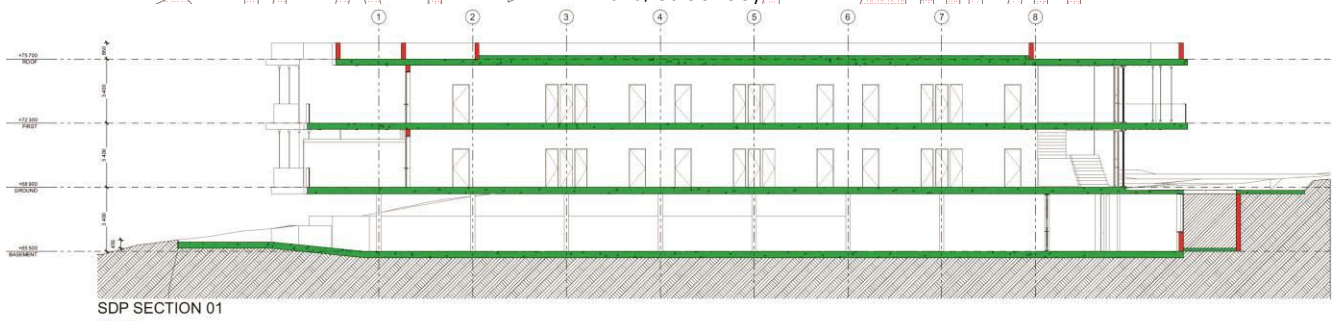
The proposed basement would comprise a building footprint of  $\pm 921\text{m}^2$ , which would thus require excavations/ earthworks. The total floor areas of the proposed ground and first floor levels would measure  $\pm 1,591\text{m}^2$  and  $\pm 1,559\text{m}^2$ , respectively thus calculating to a total construction area of  $\pm 4,071\text{m}^2$ .

A section of the proposed building (along north-south axis) shows the height of building varying between  $\pm 7,65\text{m}$  above NGL (north-facing elevation) and  $\pm 10,5\text{m}$  above NGL (south-facing elevation) (see **Figure 6**).





**Figure 5:** Proposed site development plan showing building footprint, Section 01 presented in Figure 6 (Arté Architects, 2020, as edited)



**Figure 6:** Section 01 through proposed building along north-south axis (Arté Architects, 2020)

**4.4 Environmental Authorisation**

The proposal to develop a golf course and casino at Pinnacle Point in c. 1997 triggered the need for an environmental impact assessment (EIA) in terms of the then Environment Conservation Act (1989). The application process resulted in the Department of Environmental Affairs & Development Planning (DEADP) issuing a Record of Decision (RoD<sup>5</sup>) on 29<sup>th</sup> October 2003 (copy attached as **Annexure 5**). The approval included, inter alia, an 18-hole golf course, conference facility, residential units and hotel rooms in one or more establishments. The latter was developed as stand-alone units however the central part of the hotel was never developed and “hotel” units never realised as a hotel (short term rental with facilities and services). As the current proposal would change the nature and scope of the current approval with subsequent layout and development right changes, it would require amendment of the RoD so as to reduce the number of approved erven, as well as the description for the hotel component. Accordingly, a Part 2 Amendment Application process is required. The process is prescribed in the Environmental Regulations and requires a formal application, with stakeholder input and specialist assessment where necessary<sup>6</sup>.

A Visual Impact Assessment or similar study aimed at assessing the potential impact of the Pinnacle Point Estate on the archaeological landscape was not undertaken as part of the EIA as the high cultural significance of the archaeological sites was not understood at that time.

<sup>5</sup> DEADP Ref: EG 12/2/1-74-Erf 2001 & Erf 3438)

<sup>6</sup> CapeEAPrac, 2021 [e-mail]

## 5. HERITAGE RESOURCES AND ISSUES

While HWC in the Interim comment dated 12<sup>th</sup> August 2019 requested an Integrated HIA assessing “*Visual impacts on the cultural landscape (in particular the protected area containing the Pinnacle Point Provincial Heritage Sites)*”, this integrated HIA report was undertaken in adherence to the requirements specified in terms of Section 38(3) of the NHRA.

### 5.1 Background to Pinnacle Point Site Complex

This section serves as summary, outlining chronologically the series of events leading up to declaration of the Pinnacle Point Site Complex as a Provincial Heritage Site during 2012, as well as subsequent inclusion of the PPSC PHS as part of a serial nomination by the National Department of Environmental Affairs to UNESCO during 2015, for consideration as having international heritage status.

- In 1997, Jonathan Kaplan of the Agency for Cultural Resource Management (ACRM) was requested to undertake a baseline archaeological survey of a portion of Erf 2001, the site of the proposed Pinnacle Point Estate as well as the adjoining Erf 3438 which runs along the cliff face. This survey was part of an environmental impact assessment as required in terms of the Environment Conservation Act (1989). During the survey Kaplan (together with Dr Peter Nilssen of CHARM) reported two (2) archaeological sites from Erf 2001, the location of the proposed Pinnacle Point Development, but a further twenty-six (26) archaeological sites along the coastal cliffs on a portion of Erf 3438. The sites were listed with consecutive numbers, starting with PP01, with sites considered to be related given the same number but with letters used to designate distinct caves or shelters, i.e., PP13A, PP13B etc. (Marean et. al 2004). Kaplan (1997) concluded in his study that the proposed development would not directly impact on the important archaeological sites in the coastal cliffs but that secondary negative impacts could result from the increased visitation related to the proposed development. He did not comment on the visual impact on the Archaeological Cultural Landscape.
- Kaplan submitted his 1997 archaeological report to the National Heritage Resources Agency as his study predated the National Heritage Resources Act, No. 25 of 1999.
- Meanwhile, Nilssen and Prof Curtis Marean of the Institute of Human Origins, Arizona State University (Marean et al. 2004) visited Pinnacle Point in 1999 and 2000, to investigate the archaeological potential of the sites found by Kaplan. They initiated The Mossel Bay Archaeology Project (MAP) in 2000. They selected four caves for test excavations, namely Cave PP9, PP13A, PP13B and PP13C) and they commenced archaeological work in July 2000. The caves which they selected for excavation are near the base of a vertical cliff, immediately below the Pinnacle Point Estate club house (Figure 2).
- On 29<sup>th</sup> October 2003, the Department of Environmental Affairs and Developmental Planning (DEA&DP) issued a RoD for the proposed development. The RoD includes a number of important conditions, but with respect to archaeology, the following is pertinent: “*The applicant must appoint a specialist archaeologist to oversee all excavation and earthmoving activities. The specialist archaeologist must report to the ELC and where appropriate to Heritage Western Cape on a regular basis*” (Condition 11 of the RoD: Annexure 5).
- As per the RoD, Nilssen commenced with archaeological monitoring at the Pinnacle Point Development in 2002 (2005). At this time, the newly constituted South African Heritage Resources Agency (SAHRA) was unable to grant a permit and Heritage Western Cape (HWC) had not yet been established. During Nilssen’s monitoring of around 100 ha of the proposed development, he mapped and collected more than 20,000 stone artefacts across the entire development footprint (see **Figure 10**).
- In 2001, Nilssen and Marean revisited the sites with a team to undertake OSL dating, with further surveys and mapping. Increased developments at the Pinnacle Point Development/Estate in 2004, resulted in more monitoring and the mapping and collection of stone artefacts by CHARM, with a survey below the cliffs in 2006. In total, some 58 archaeological, palaeontological and geological sites have been mapped at PPSC (ICMP:2017-2022:22).
- In 2007, Nilssen and Marean published a highly significant article on the early human use of marine resources and pigment from site PP13B in the prestigious journal, *Nature* (Marean et. al 2007). This drew international interest and significant funding for research. Archaeological research has been ongoing resulting in numerous academic publications. The results are further discussed in below.
- The Pinnacle Point Site Complex (PPSC) was proclaimed a Provincial Heritage Site by Heritage Western Cape on 14 December 2012 (**Annexure 6**). Subsequently, during 2014, HWC approved an Archaeological Conservation Management Plan (ACMP) for the PHS (**Annexure 7**).
- In May 2015, the Mossel Bay Municipality proposed to HWC the establishment of the Pinnacle Point Heritage Buffer Zone (**Annexure 8.1**). This proposal was subsequently approved by HWC (with minor revisions) through their correspondence dated 9<sup>th</sup> June 2015 (**Annexure 8.2**). The adjoining Erf 15391, owned by Mossel Bay Municipality, has been incorporated into the Buffer Area as a “conservation area” to the Pinnacle Point Estate (**Figures 8, 9**).
- On 15 April 2015, Pinnacle Point together with Diepkloof (near Elands Bay) and Blombos (Stillbay) in the Western Cape, Klasies River in the Eastern Cape, and Sibudu Cave and Border Cave in KwaZulu-Natal, formed part of a serial nomination submitted to UNESCO by the Department of Environmental Affairs of the Republic of South Africa, for World Heritage status.

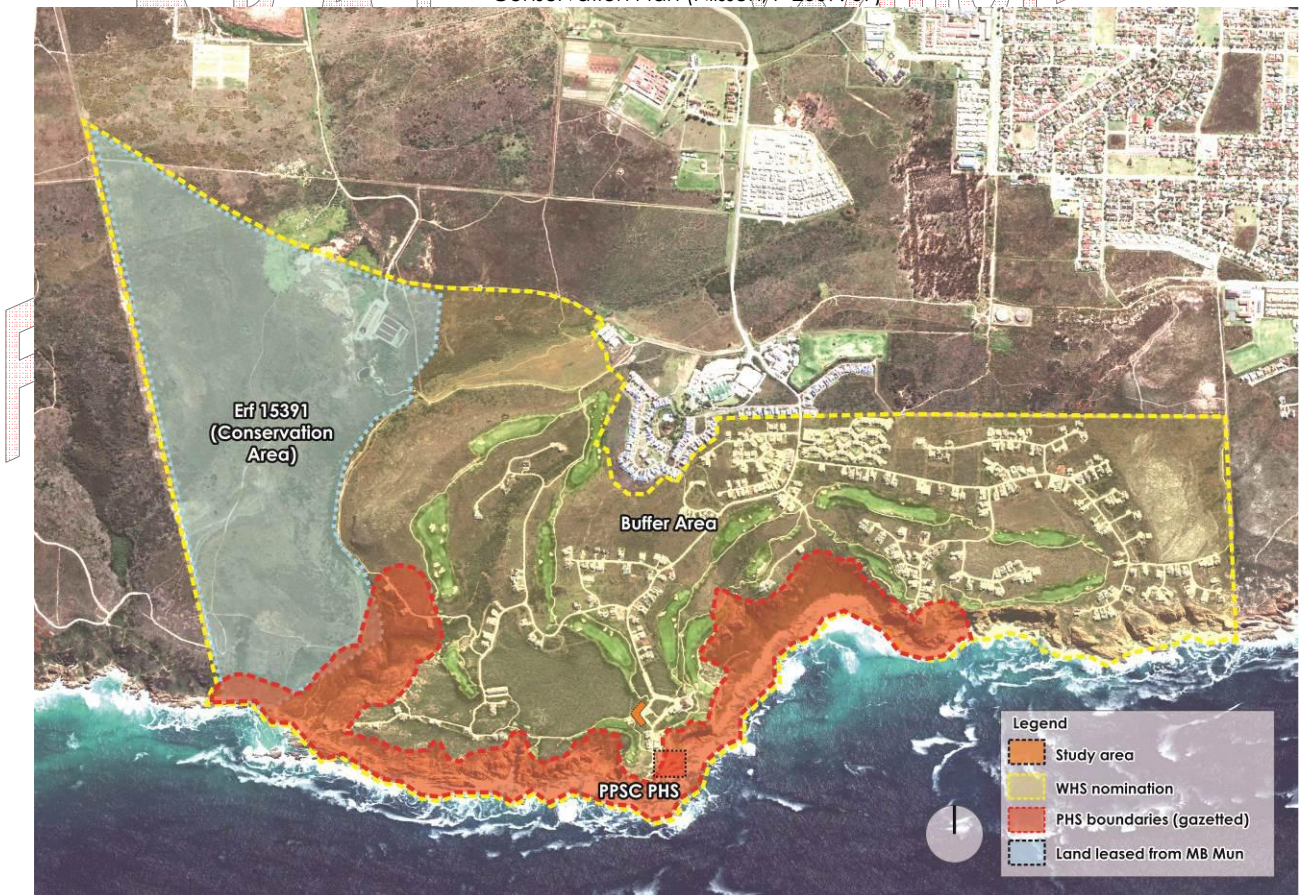


- According to the Integrated Conservation Management Plan for the Pinnacle Point Site Complex (2017-2022), the three sites in the Western Cape will be the first sites to be nominated, with the others following later. The ICMP for each of these sites forms part of the nomination process, which is still in progress.



Plate 2. Enlarged area as indicated in Plate 1. The original and formerly proposed alignments of the CSBT are shown in blue and red respectively while green lines – overlying red - show the current proposed alignment. Note that the latter do not run past highly sensitive archaeological sites. Recorded archaeological and environmental resources are indicated with red dots (approximate locations).

**Figure 7:** Mapping of archaeological occurrences along Pinnacle Point coastline as part of Archaeological Conservation Plan (Niissen, P 2009: 69)



**Figure 8:** Study area in relation to the PPSC PHS, area included as part of the WHS nomination. Erf 15391 has been included in the Buffer Area to the PPSC PHS as a conservation area (MB GIS, 2020 as edited)





**Figure 9:** Study area shown in relation to known archaeological sites as well as the extent of the PPSC PHS and the Buffer Zone (MB GIS, 2020 as edited) (\*) Approximate locations

## 5.2 Archaeology

The PP13 site complex and that of PP5-6, located in the cliff face below the Pinnacle Point clubhouse (Figure 2), have been the focus of archaeological research during the last two decades. However, archaeological research has also been conducted on a number of other localities within and immediately adjoining the PHS. These are briefly discussed below.

### 5.2.1 The PP13 site complex

Test excavations at PP13A and PP13B commenced in 2000 and the deposits yielded rich MSA horizons and good preservation of fossil bone and lithic assemblages. Archaeological deposits have been dated by OSL between ~164 ka and ~92 ka. The earliest occupation at PP13B (refer to Figure 2) dates to the early Marine Isotope Stage 6 when the coastline was some 5-6 km from the site (Marean 2010a, b). Some of the highly significant discoveries made at the site are the basis for the subsequent proclamation of the PHS, and the nomination of the WHS:

- According to Marean *et. al* (2007) "by ~164 ka ( $\pm 12$ kyr) at Pinnacle Point (on the south coast of South Africa), humans expanded their diet to include marine resources". The systematic collection of shellfish has been recognized as significant evidence for *Homo sapiens*, and Pinnacle Point shows that a coastal adaptation was present in South Africa before the postulated out of Africa migration around ~70-60 ka (Jerardino and Marean 2010);
- The pigments (ochre pieces) at PP13B represent some of the oldest pigments yet known (Marean 2010b). According to Watts (2010), there are 57 pigment pieces from the site. He interprets this to mean that MSA people were deliberately targeting these colours. It suggests that early humans "inhabited a cognitive world enriched by symbols before 160 000 years ago" (McBrearty & Stringer 2007);
- At the same time as we have the evidence for an expansion in habitat and diet, there is evidence for the "production of bladelet stone tool technology, previously dated to post – 70 kyr" (Marean *et. al* 2007);
- PP13B site also contains the earliest evidence for the heat treatment of silcrete (~164 ka) – the heating of the raw material prior to knapping is believed to make it easier to flake (Murray *et. al* 2020).

### 5.2.2 The PP5-6 site complex

These sites were excavated as part of the SACP4 between 2006 and 2011. These sites too have provided some of the earliest evidence for complex human behaviour and technology during the MSA (see Figures 2 and 7). The range of dates for occupation of the sites is between ~96 ka and ~51 ka. Some of the significant findings include:

- Esteban *et. al* (2018) has used phytoliths (silica particles which are deposited in the cells of plants) as evidence for the "intentional gathering and introduction into living areas of plants from the *Restionaceae* family by MSA hunter-gatherers during the MIS5" suggesting that the occupants "built fast



fires using mainly grasses with some wood from trees and/or shrubs for specific purposes, perhaps for shellfish cooking".

- Evidence for the world's earliest known microlithic technology.
- Microscopic fragments from the Toba super-eruption (one of Earth's largest known volcanic eruptions), which occurred some 75 000 years ago in Sumatra, Indonesia has been found at the site in ~74 ka levels (Esteban et. al 2018).

**5.2.3 Early Stone Age**

In addition to the significant MSA deposits described above, there is also considerable evidence for the Early Stone Age across the study area. During the monitoring of the construction phase of the adjoining Garden Route Casino and new Pinnacle Point Road in 2002, large numbers of MSA and ESA artefacts were identified in the topsoil and sand layers, but the densities and distribution of the artefacts were highly variable and unpredictable (Nilssen 2005). According to Nilssen, the majority of the 20 000 stone artefacts which he mapped and collected across the Pinnacle Point Estate (i.e. within the buffer zone of the WHS) were Early Stone Age. Mitigation in the form of excavations was not implemented as the artefact densities were generally low (Nilssen 2005). (Figure 10)



Plate 3. Rectified aerial photograph of the enlarged area as indicated in Figure 1. The boundary of the property under development is indicated by the white outline. Shown are the locations of plotted artefacts and/or artefact scatters (generated using ArcView GIS) and the area monitored in 2002 that includes numerous plotted artefacts and artefact scatters. Area in red frame is enlarged in Plate 4.

**Figure 10:** Mapping showing density and distribution of archaeological occurrences across the Pinnacle Point Estate which were mapped during archaeological monitoring (Nilssen, P 2005: 18)

**5.2.4 Later Stone Age**

In his 1997 survey, Kaplan identified a series of mid-late Holocene shell middens in the western section of the Pinnacle Point Estate which were termed the Pinnacle Point Shell Midden Complex (PPSMC). These were excavated between 2006/2007. According to McGrath et. al (2015), the middens are located between largely sterile dune and straddle a small erosion gully. The excavations produced dates of between 3000±75 BP and 890±30 BP across seven spatially and temporally distinct shell middens. There is evidence for periodic LSA hunter-gatherer occupation, after which there is a gradual introduction of elements associated with pastoralism, such as "stone-lined hearth, spatial patterning, pottery and domestic stock". The later inhabitants of the PPSMC are described by McGrath et. al (2015:218) as being "closer to the foraging end of the herder-forager continuum". A list of the sites at Pinnacle Point, with their grading as proposed by Nilssen (2009) is appended at the end of the report as part of **Annexure 9**.

### 5.2.5 Archaeological Assessment of Erven 19324-19326

Two archaeological foot surveys have been conducted of the property, namely by Nilssen on the 6<sup>th</sup> June 2019 and by Webley on 26<sup>th</sup> January 2021. Survey tracks were recorded with a Garmin GPSMap 64 and photographs were taken of the property and adjoining environment (**Annexure 3**). A considerable amount of building rubble (some 1m thick) has been deposited onto a large portion of Erf 19325, while Erf 19326 is covered in thick vegetation and a comprehensive foot survey was not possible. No archaeological remains were observed on the surface of the erven or in the surrounding area. However, this does not mean that no stone artefacts are present below the surface. In a comprehensive summary of his monitoring programme, Nilssen (2005) describes the soil stratigraphy as comprising sandy topsoil, under this is a clay layer overlying a calcrete deposit that varies in thickness between 20cm to 150cm. The bulk of the stone artefacts have been recovered from the topsoil and sand body.

### 5.3 Palaeontology

A specialist comment has been solicited from Dr John Almond (February 2021) regarding the palaeontology.

*"According to the 1: 50 000 geological map sheet 3422AA Mosselbaai the Pinnacle Point area is underlain at depth by fluvial sandstone bedrocks of the Skurweberg Formation (Table Mountain Group, Cape Supergroup) of Silurian age that build the coastal cliffs here.*

*The Skurweberg sandstones are deformed by folding, faulting and related fracturing and are generally of low palaeosensitivity. Low-diversity trace fossil assemblages (invertebrate burrows) are the commonest fossils in this rock unit but are unlikely to be well-preserved in this context.*

*The bedrocks underlying the outer margins of the elevated coastal platform at Pinnacle Point, including the hotel project area, are mapped as being blanketed by calcretised, cross-bedded Pliocene aeolianites (wind-blown sands) of Pliocene age assigned to the Wankoe Formation (Bredasdorp Group). These aeolianites are usually of low palaeosensitivity, the commonest fossils being various genera of terrestrial snail shells and calcretised rootcasts or burrows. Rare, localized pockets of high palaeosensitivity, might occur, however, in the form of fossil carnivore (e.g. brown hyaena) dens which may be associated with diverse mammalian bones and teeth, as well as micromammal assemblages and snail accumulations in karst solution cavities. Several important new mammalian trackways have recently been recorded from Pleistocene aeolianites along the Cape south coast but not, as far as I am aware, from the older Wankoe Formation"*  
(Dr John Almond pers. Comm. February 2021).



**Figure 11:** Extract from SAHRIS PaleoSensitivity Mapping showing study area within (blue) area of Low Sensitivity (SAHRIS, 2021 as edited)

SAHRIS Palaeontological (fossil) Sensitivity Mapping (**Figure 11**) indicates that the study area is situated within an area of Low Sensitivity (Blue), within which no palaeontological studies are required though a protocol for possible find must be put in place (PalaeoSensitivity Map, 2021).

According to Marean et. al (2010b:236) *"the heavily dissected cliff displays caves, gorges, arches, and stacks that signal cliff dissection and retreat, a process enhanced by repeated high sea levels"*. While the TMS is acidic, water entering the cave systems are buffered by the overlying calcium carbonate rich dune sands



resulting in the preservation of the faunal remains in the archaeological sites. Small stalactites and stalagmites are present in many of the caves, often intercalated with archaeological deposits and these have provided the opportunity to conduct both uranium-thorium dating (U-Th) and optically stimulated luminescence (OSL) on the sediments and provided a record of palaeoclimates (Bar-Matthews et. al 2010).

While monitoring trenching into the calcretes, an accumulation of fossilized bone in a carnivore lair (PP30) was exposed (Figure 7). The material was collected with a permit issued by HWC. The site has been identified as a MIS 6 fossil hyena den, the analysis of material from this site provides important information on the palaeoenvironment of the Palaeo-Agulhas Plain (Williams et. al 2020) and the ancient fauna of the area. The discovery of the hyaena den in the calcretes during trenching, point to the importance of monitoring during earthworks.

#### 5.4 Cultural landscape context

Although the NHRA does not clearly define the term "cultural landscape", it briefly refers to it in the schedule of definitions. A working definition suggested by Winter, S (2004) is:

*"A place of cultural significance, which engenders qualities relating to its aesthetic, architectural, historical, scientific, social, spiritual, linguistic, technological, archaeological or palaeontological value"*<sup>7</sup>

The following alternative definition offers insight into the complexity of cultural landscapes from a broader, holistic perspective (Green, B.H., 1995):

*"The concept of landscape gives expression to the products and processes of the spatial and temporal interaction of people with the environment. It may thus be conceived as a particular configuration of topography, vegetation cover, land use and settlement pattern which establishes some coherence of natural and cultural processes and activities"*.

Cultural landscapes relate to the imprint created on a natural landscape through human habitation and cultivation over an extended period of time, as defined by a human geographer (Carl O. Sauer, 1925):

*"The cultural landscape is fashioned from a natural landscape by a cultural group. Culture is the agent, the natural area is the medium, the cultural landscape is the result"*.

Essentially then cultural landscapes create a broad (spatial and temporal) relational framework within which all other heritage resources are rooted. The definition of cultural landscapes therefore enables broader understanding of the spatial and spiritual evolution of a landscape over time as expressed through perceivable "patterns" or associations relating to aspects such as socio-historic aspects, land use, settlement pattern, built form, vegetation cover, topography and so on.

##### 5.4.1 Prehistoric landscape patterns

We know from Early Stone Age remains that early hominid groups were likely utilising this landscape many hundreds of thousands of years ago. All that has remained of their lifeways (from tangible and intangible contexts) are scatters of stone tools above the coastal cliffs. However, the archaeological evidence from some of the sites along the cliff at Pinnacle Point suggest that at around 164 000 years ago, early modern humans commenced a coastal adaptation due to changing environmental conditions, setting in motion significant neurological and behavioural changes (Marean et. al 2007). It is these changes which have been identified in the WHS nomination.

We have considered, in this assessment, the prehistoric cultural landscape. Little has been written on the topic in South Africa with the exception of Orton (2016) who has proposed a typology for prehistoric cultural landscapes (PCL). He identifies five types, with the PPSC falling within Type 3, namely "Areas containing vast numbers of archaeological sites in relatively close proximity to one another". This description matches that included in the WHS nomination for the PPSC.

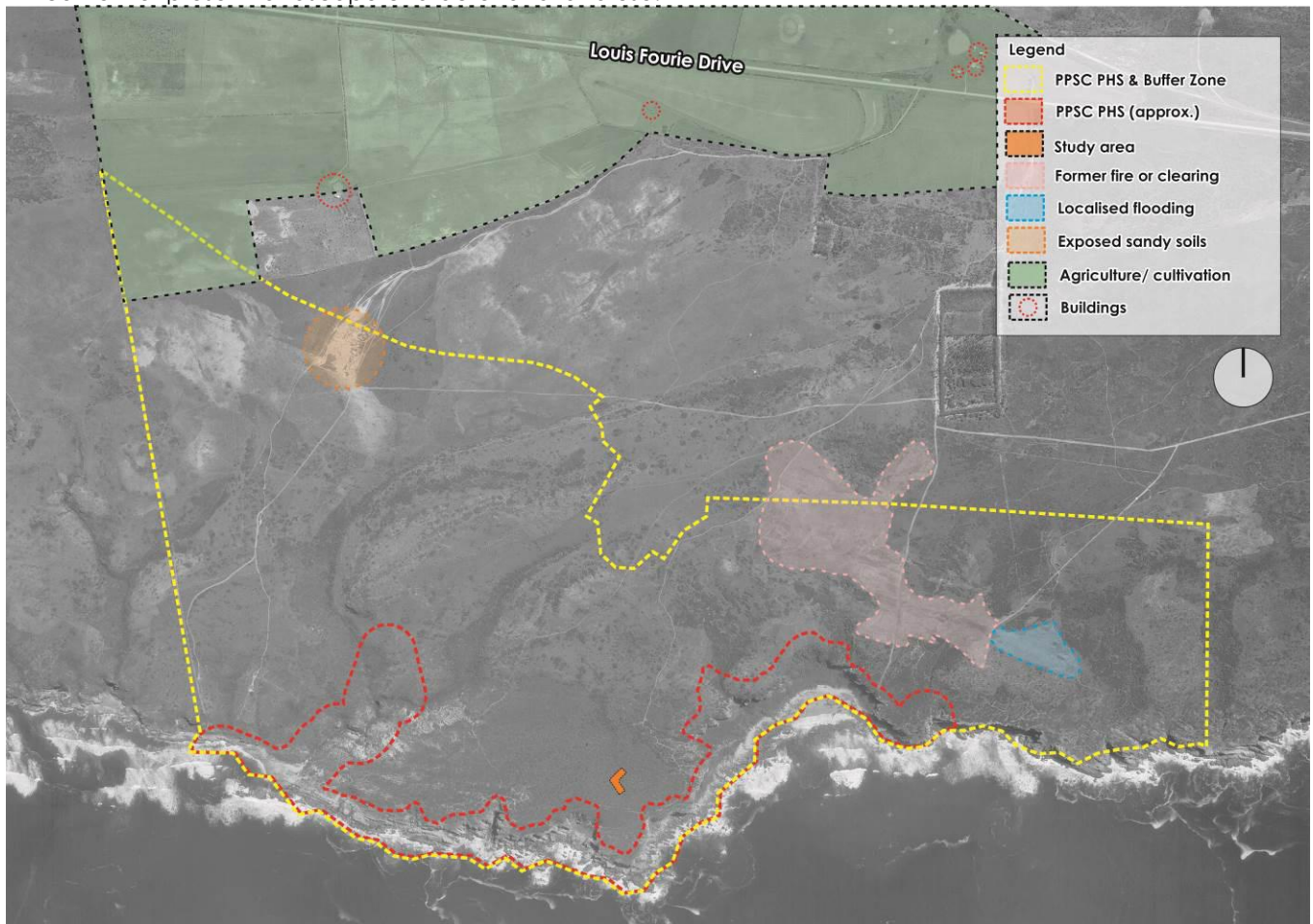
Sites such as PP13B and PP5-6 are pivotal to understanding prehistoric landscape utilisation as global sea levels rose and fell. As sea levels dropped by as much as 130 m, the coast was approximately 5 to 10 km south of its present position, exposing large areas of the Palaeo-Agulhas Plain for human settlement and resource exploitation. Early humans would have "expanded their home ranges to include coastlines and followed the shifting position of the coast" (Marean et. al 2007). These settlements on the plain have since been inundated with rising sea levels and are no longer visible.

The Pinnacle Point archaeological sites would have provided early modern humans with shelter and access to the marine resources which became so crucial to their diet during glacial stages. As the present landscape has evolved and been shaped by the ever-changing sea levels over hundreds of thousands of years, it could therefore be argued that archaeological occurrences still evident within the present landscape, are only remnants of former prehistoric cultural landscapes (also refer to Section 5.2.1).

<sup>7</sup> Baumann & Winter Heritage Consultants (2004)

#### 5.4.2 **Traditional landscape patterns**

While now largely permanently altered through modern urban development (i.e. Pinnacle Point Estate), it was considered pertinent to slightly expand on the gaps in our understanding of the evolution of this coastal landscape through identification of traditional (i.e. Pre-Modern) landscape patterns as read within the context of present landscape character and land use.



**Figure 12:** PPSC PHS and Buffer Zone imposed onto extract from 1957 aerial imagery. Limited human intervention illustrated and summarised in legend (NGSI: Flight 403 of 1957, Flight Strip 13, Image 3446)

Analysis of early (1957) aerial imagery proved useful in identifying the following (Pre Modern) landscape patterns within the area of study and its direct environs (**Figure 12**):

- The PPSC PHS and Buffer Zone was mostly characterised as a natural coastal landscape overgrown by indigenous coastal vegetation;
- Exposed area (exposed sandy soils) noted to northwest of current Buffer Zone;
- Roughly seven narrow informal tracks noted traversing landscape and leading towards the coastline;
- Former clearing of vegetation (possibly as a result of veld fire or physical clearing) noted along the southeast portion of the Buffer Area;
- Localised erosion evident directly east and southeast of said cleared area;
- Agricultural fields/ cultivation noted north of the area as well as northernmost tip of the Buffer Zone;
- No buildings/ structures are noted within the PPSC PHS and/or Buffer Zone during this period though several structures occurred along Louis Fourie Drive.

#### 5.4.3 **Cape St Blaize Trail (CSBT)**

The trail follows the 30 m contour along the cliffs from below the Cape St Blaize Lighthouse to Dana Bay, a distance of some 13.5 km. The status of the trail has been confirmed by ways of a servitude right-of-way (footpath) registered in favour of Mossel Bay Municipality. The trail is known to attract national and international hikers and therefore important from a tourism perspective.

Nilssen (2007:32) notes that "*stretches of the CSBT in the vicinity of Pinnacle Point were destroyed by construction activities and as a result the trail now runs in places close to the development and future houses*". Since this has had a negative impact on the trail, proposals were put forward to change the alignment of the trail. However, it was an HWC requirement that the trail remains at the top of the cliffs.

Currently, as the trail winds around the headland, hikers are in close proximity to several large residential structures and the Pinnacle Point golf club (Figure 2). Apart from the buildings overlooking the trail, the hike also is within metres of the golf course and several of the greens, which may raise concerns regarding the safety of hikers.



**5.4.4 Pinnacle Point Site Complex Visual Impact Assessment, 2020**

The PPSC VIA was commissioned by HWC in order to assess the impact of existing and approved urban development associated within the Pinnacle Point Estate ("the estate") on the PPSC PHS in view of its inclusion as part of a World Heritage Site (serial) nomination to UNESCO. The PPSC VIA contains likely viewsheds from Cave 13B (open to guided tours) as well as Caves 5-6, respectively. The location of the subject study area has been transposed onto the two maps (Figures 13, 14).



**Figure 13:** Viewshed with distance radii as perceived from **Cave 13B**. The study area would not be visible from this cave site (Square One, 2020:28, as edited)



**Figure 14:** Viewshed with distance radii as perceived from **Caves 5 and 6**. The study area would not be visible from this cave site (Square One, 2020:28, as edited)

The report makes reference to, inter alia, the visual impact of the clubhouse complex, residential buildings further southwest as well as clustering of urban development within the estate which tends to visually protrude from the landscape and consequently detract from the surrounding natural coastal landscape "from certain vantage points" (2020:24).



In reference to “sense of place”, the report emphasises the notion that modern existing and approved urban development associated with the estate may be perceived within the context of continued human intervention within the landscape and more specifically:

*“The visibility of the development from the Caves does, however, speak of a historical and cultural landscape layering, where modern development is visible almost as a continuum of human development, in juxtaposition to the ancient tools, techniques and cultures of our hunter gatherer ancestors. This cultural layering becomes part of the experience of the caves and references the complex development of Modern Man to the present day.”*  
(2020:24)

The report concludes that, despite the cumulative impact of urban development on the former wilderness landscape, archaeological occurrences (i.e. “archaeological attributes”) have remained intact and that the (estate) development has not eroded the authenticity and integrity of the PPSC [Sic]:

*“The arch[a]eological attributes to OUV are of global significance and although the historical landscape and intangible cultural heritage associations has been impacted by the development of the Estate, the arch[a]eological attributes have remained intact. Despite modern intervention, the site has retained a unique sense of place, and the development is therefore not considered to have eroded the authenticity and integrity of the OUV of the PPSC to a highly detrimental degree.”*  
(Square One, 2020:25)

## 6. SIGNIFICANCE AND GRADING

### 6.1 Archaeology

The Grade II (but potentially Grade I) significance of the archaeological sites at PPSC is clearly set out in the Province of the Western Cape, Provincial Gazette No 7075 (14 December 2012):

*“The Pinnacle Point Site Complex (PPSC) preserves in a short stretch of coastline Africa's densest concentration of well-preserved archaeological sites, some of which date to the time of the origin of our species (Homo sapiens). All the Pinnacle Point sites have excellent fossil bone preservation in the oldest layers, unlike many other caves along the Cape coast. The Pinnacle Point Site Complex contains some of the world's oldest evidence for coastal exploitation (shellfish), some of the earliest radiometrically dated use of pigment (ground red ochre), and early evidence for heat treatment technology. Later Stone Age sites are abundant at the Pinnacle Point Site Complex as well, and the most recent pre-colonial human occupation of the area is represented by coastal shell midden deposits. The Pinnacle Point Site Complex preserves a rich record for palaeoclimate and palaeoenvironment in the form of speleothems, raised beaches, fossil dunes, and palaeontological assemblages. All are spread continuously across the area and together provide a valuable record of human, climate and environmental co-evolution in Africa. The Pinnacle Point Site Complex preserves a unique sequence of human occupation from 170 000 years ago to pre-colonial human occupation embedded in a rich record for climate and environmental change.”*

The Pinnacle Point site complex (as one of five Southern African sites) has been placed on South Africa's tentative list of UNESCO World Heritage sites, addresses its outstanding contribution to our understanding of:

- The origins of anatomically modern humans (Homo sapiens) in southern Africa
- The earliest archaeological evidence for dietary innovations in the form of the consistent exploitation of coastal resources
- Evidence in the form of stone tools, pigments and hearths which support social, behavioural and technical innovations and modern human behaviour
- Palaeoenvironmental and palaeoclimatic conditions during the Late Pleistocene as derived from speleothems, faunal, floral and geological remains.

Their nomination on the tentative list of World Heritage sites emphasises their “outstanding universal value” (OUV). In a short section of coastline are preserved “Africa's densest concentration of well-preserved archaeological sites with a unique sequence of human occupation from 160 000 years ago to pre-colonial times embedded in a rich record for climate and environmental change” (ICMP 2017-2022: vii).

### 6.2 Palaeontology

According to Almond (pers.comm) the aeolianites which cover the proposed development area are of low palaeosensitivity. While he recognizes that localized pockets of high palaeosensitivity might occur, in the form of fossil carnivore (e.g. brown hyaena) dens (such as PP30) in karst solution cavities, this is very rare.

The PHS nomination (see above) has described the high significance of the PPSC in terms of providing information of both past climates and past environments as derived from speleothems (stalagmites and stalactites), raised beaches (which relate to past sea level fluctuations), fossil dunes and fossil bones accumulations of past faunal species. These are unlikely to be impacted by the proposed development.



### 6.3 Cultural landscape context

The VIA points out that modern development within the estate – as viewed from the Caves – may be perceived as a form of “historical and cultural layering” within the landscape. While we agree that this notion holds some relevance it does not adequately capture the complexity of the (wilderness) coastal cultural landscape or the density and distribution of archaeological sites as well as (recorded) scattered occurrences throughout the estate. Furthermore, it does not acknowledge the intensity of the direct visual impacts associated with the estate on the integrity and authenticity of the coastal cultural landscape and on tangible and intangible heritage resources within the former landscape.

We do not therefore necessarily concur with the view putted in the VIA that [sic] “the archaeological attributes have remained intact” though we are persuaded to some extent that “the development is therefore not considered to have eroded the authenticity and integrity of the OUV of the PPSC to a highly detrimental degree” (Square One, 2020:25).

It is acknowledged that what remains of the former coastal cultural landscape (together with the archaeological occurrences and sites rooted within), as defined within the boundaries of the PPSC PHS, are of very high cultural significance.

Considering the significance of the Buffer Zone to the PPSC PHS is however more complex as large tracts of land have and will in future be transformed through urban development already permitted. Though undeveloped conservation areas remain within the Buffer Zone, the low density, sprawling layout of the estate effectively fragmented the cultural landscape directly and indirectly (i.e. sense of place) thus translating into comparatively lower cultural significance (possibly varying between Grade 3B and 3C).

## 7. ASSESSMENT OF IMPACTS

### 7.1 Archaeology

No direct impacts are anticipated on the internationally significant archaeological caves and rock shelters in the cliff face. Pinnacle Point Estate keeps strict control over access to the caves and the ACMP will protect the sites from any increased visitor traffic. Indirect visual impacts specifically to the archaeological sites of PP13 and PP5-6 are addressed under 7.3.2. There is a low-medium probability that earthmoving will uncover scattered ESA and/or MSA stone artefacts in the sandy topsoil of Erven 19324-19326. However, Nilssen (2005) has found elsewhere on the estate that densities and distribution of the artefacts were highly variable and unpredictable, and he has not implemented mitigation in the form of excavations. He has therefore plotted and collected artefacts where appropriate (Nilssen 2005).

As per the conditions of the RoD and the ACMP, monitoring of earth works on the affected properties by a specialist archaeologist must be included in the EMP. Any collection of stone artefacts will have to be undertaken with a Workplan issued by Heritage Western Cape. If any significant archaeological material is uncovered, work must stop in that area immediately so that the archaeologist (and HWC if necessary) investigates.

### 7.2 Palaeontology

Impacts to palaeontology, particularly in the sandy soils above the cliff face, according to Almond (pers. comm.) are likely to be low. The possibility exists, like the carnivore lair uncovered at PP30, that fossil bone accumulations may be uncovered. These types of accumulations could be identified by the specialist archaeologist on site. If any bones are uncovered, work must stop in that area immediately, so that the archaeologist can investigate and contact HWC and a palaeontologist.

Therefore, although the likelihood of recovering fossil material is low, and an archaeologist will be monitoring all sub-surface excavations, it is recommended that the HWC Chance Fossil Finds Protocol is implemented as well to ensure that there are no accidental impacts to below ground heritage resources.

### 7.3 Cultural landscape/ Visual impacts

The Draft ICMP (2017-2022) incorporates a “cultural landscape map” (2016:14) mapping the occurrence of heritage resources from a broader urban perspective but unfortunately does not interrogate and/or provide further clarification on how this concept may be applied within the context of the PPSC PHS and Buffer Zone. The report furthermore indicates that the Buffer Zone to the PPSC PHS will become an Overlay Zone when the Mossel Bay Municipality’s new Town Planning Scheme By-Law is implemented with effect from March 2017. (ICMP 2017-2022: 16) The Mossel Bay Municipality: Integrated Zoning Scheme By-Law, 2019 does not include an overlay zone though additional provisions (relating to permissible coverage, height, floor factor and building lines, are outlined in Schedule 7 (Annexure B) of the bylaw, as addressed in further detail below.

#### 7.3.1 Comparative analysis: Existing vs Proposed rights

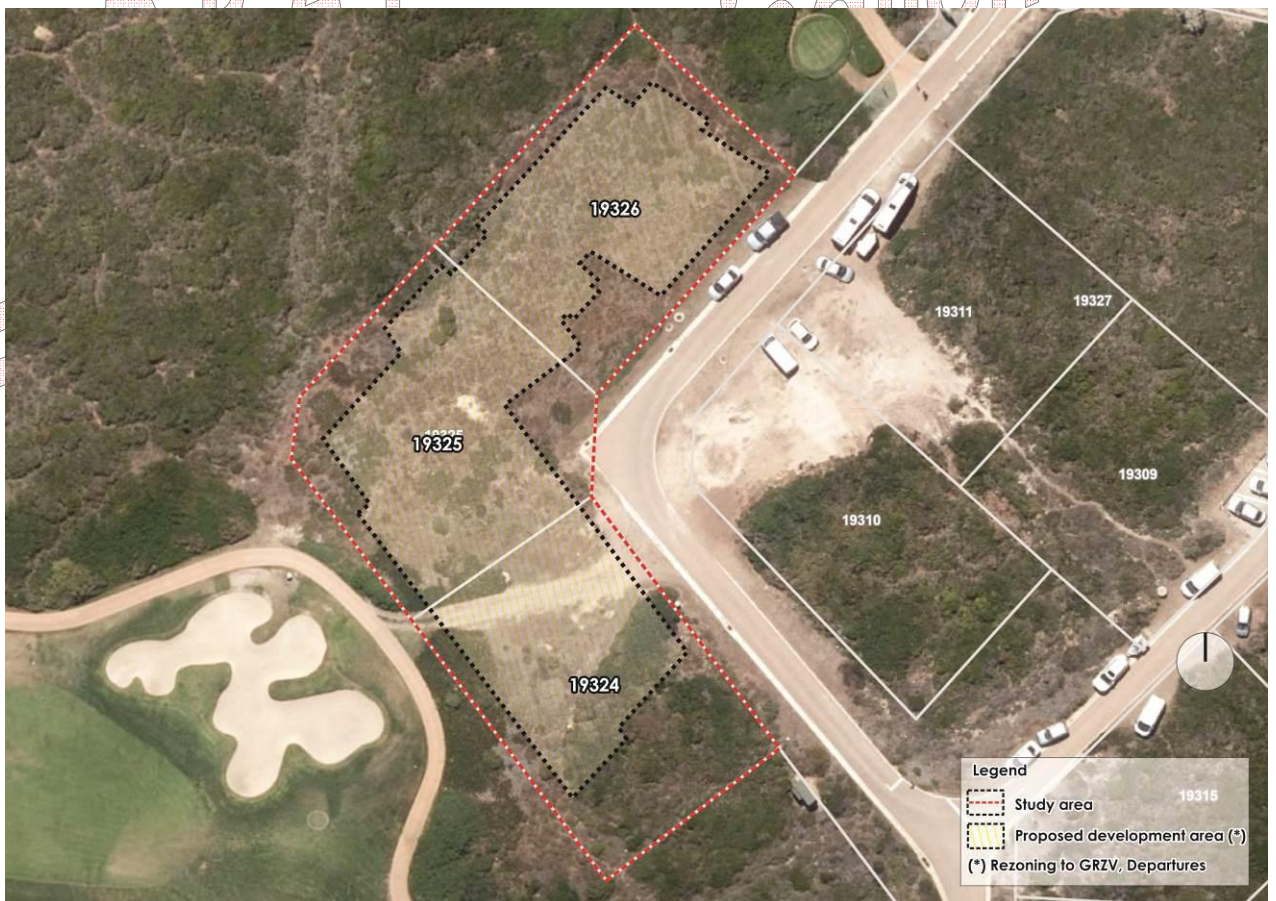
Even 19324, 19325 and 19326 form part of a cluster of twelve erven zoned Single Residential Zone I (SRZI) and the neighbouring club house complex zoned Business Zone I whilst the adjoining car parking area and golf course are zoned as Open Space Zone II.



A simplified comparison between the maximum building footprint allowable on each property in terms of the current SRZI zoning and applicable development parameters (**Figure 15**) vs. the spatial implication of the land use rights being applied for (**Figure 16**) are presented below for illustrative purposes.



**Figure 15:** Maximum building footprint of each erf given rights inferred through current zoning SRZI (MB GIS, 2020)



**Figure 16:** Approx. building footprint being applied for in terms of GRZV (MB GIS, 2020)



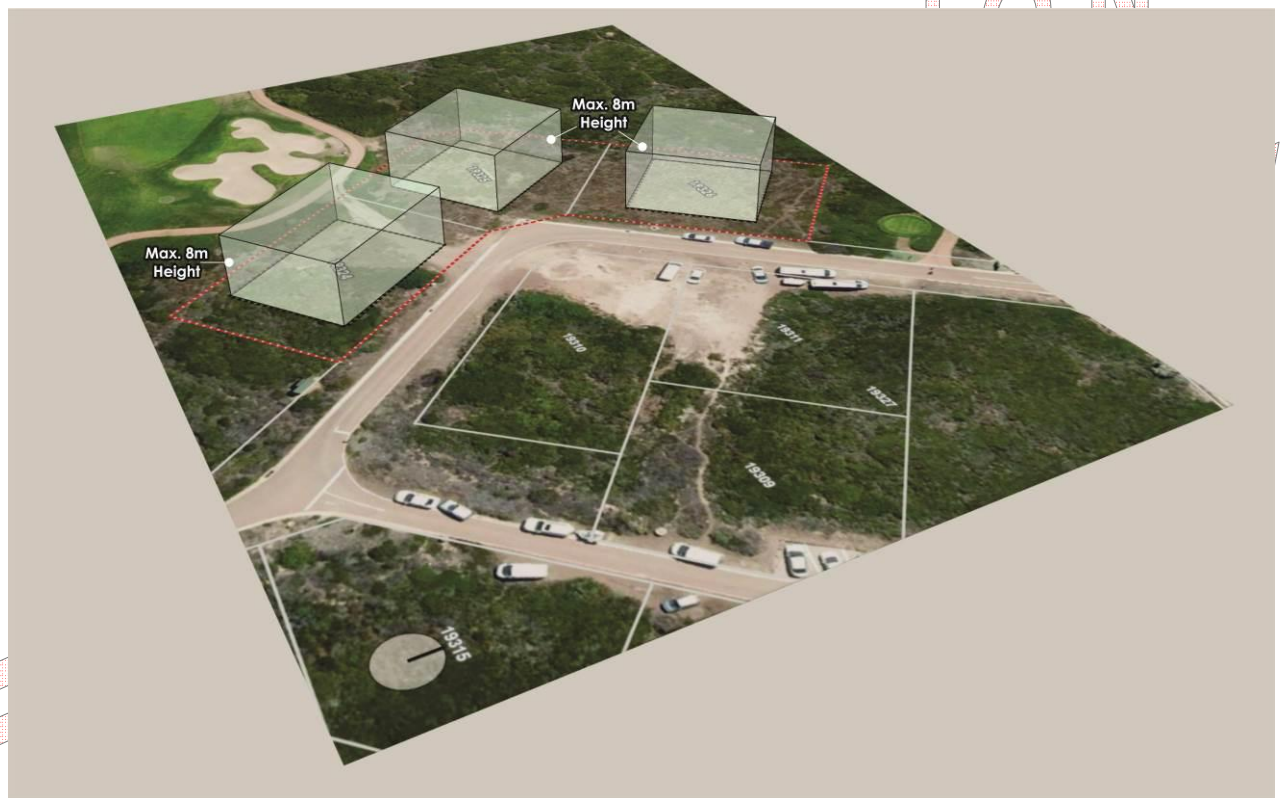
**Land use rights (development parameters) presently applicable** to the three subject erven are for the construction of a “dwelling house”, which in terms of the bylaw means, “a building containing only one dwelling unit, together with such outbuildings as are ordinarily used with a dwelling house” and as summarised below:

Coverage	Max. height	Floor factor	Building lines		
			Street	Side	Rear
40% (Only 60% of site may be disturbed)	8,5m (2 storeys)	1,5	5m	1,5m	3m

**Land use rights being applied for** in the land use application is for consolidation of the three properties and rezoning of the newly-created portion to General Residential Zone V (GRZV), together the following development parameters:

Coverage	Max. height	Floor factor	Building lines		
			Street	Side	Rear
70%	10,5 (2 storeys, basement parking)	1,0	2m	2m	2m

**Figures 17 and 18** (overleaf) provide simplified comparative illustrations of the maximum building envelope (including bulk, height) that may be achieved within the context of the existing land use rights applicable vs. the potential building envelope that are being applied for. Both represent oblique northwest-facing views towards the study area and do not make provision for topography.

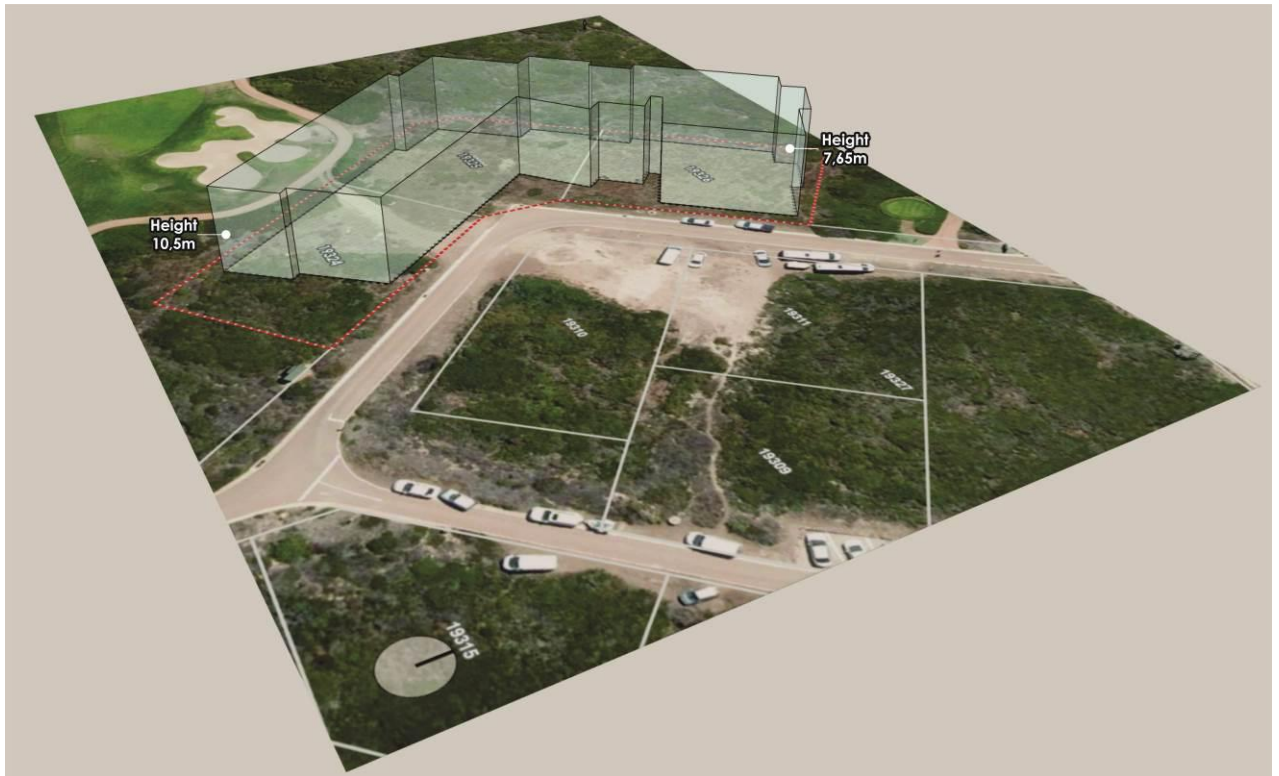


**Figure 17:** Simplified oblique northwest-facing view presenting implication of potential building envelope in terms of existing SRZI and applicable development parameters. Note that topography has not been factored into the illustration. (Compare with Figure 18 overleaf)

**7.3.2 Potential visual impacts**

During field work it was found that the **proposed development would not be visible from the highly significant archaeological sites situated within the PPSC PHS (e.g. cave sites PP13B and PP5-6)**; nor from the boardwalk traversing the steep cliffside leading from the CSBT to the respective caves. In fact, viewshed maps (2020: 28, 29) presented as part of the PPSC Visual Impact Assessment (2020) illustrate existing and approved development associated with the Pinnacle Point Estate that would be visible from cave sites PP13B and PP5-6 (Figures 13 and 14 above). These are useful in that they confirm that the development currently proposed on Erven 19324, 19325 and 19326 would not be visible from either of these archaeological sites.

At present, only a partial, intermittent view of the very upper portion of the building may possibly be visible from a short section along the CSBT – directly southwest of the club house (**Figure 19**). Such (current) view of the structure (if any) would be within the context of existing modern residences and the club house complex. More importantly though is the fact that there remain **two vacant erven (also refer Figure 2), which when developed will completely obscure any views of the proposed building from the CSBT.**



**Figure 18:** Oblique northwest-facing view taken from the same position as Figure 18 providing a simplified illustration of the potential building envelope being applied for. Again, note that topography has not been factored into the illustration



**Figure 19:** Northeast-facing view from the CSBT between Erf 19315 and Club house complex will in future be obscured once currently-vacant Erven 19315 and 19316 are developed.

Although the proposed boutique hotel building might be visible from further away within the estate with possibly intermittent views further along the CSBT, such views would (a) be over a much longer distance and (b) show the building within the context of the existing developed cluster made up of the club house complex and adjoining developed (and undeveloped) residential erven.

In conclusion it may be argued that development of the estate has, in a relatively short span of time, significantly altered the integrity and authenticity of the (natural/ wilderness coastal) cultural landscape as it would have been experienced by early humans or even, at least in part, by modern humans prior to commencement of the PP Estate development – 1957 aerial imagery being a case in point.

From the above assessment it is therefore considered that the **proposed development would not militate against the present (remaining) cultural landscape context and/or negatively impact upon the visual integrity of the PPSC PHS.**

**7.4 Cumulative impacts**

Proposed facility would effectively provide for a land use (hotel) already accounted for in the existing environmental approval (2003) though never implemented. Given the location the location of the three erven within an already-approved, partially-developed urban cluster set within a much larger estate, which has already significantly transformed the (wilderness) coastal cultural landscape; and taken in conjunction with the limited overall impacts of the proposed boutique hotel in comparison with existing land use rights; any incremental impact that might result as an outcome of the enhanced land use rights are considered negligible and reasonable.



## 7.5 Socio-economic development

Section 38(3)(d) of the NHRA requires an evaluation of the impact of the development on heritage resources relative to the sustainable social and economic benefit to be derived from the development. Although present tourism numbers to Pinnacle Point and adjoining areas and towns have been heavily impacted by the Covid-19 pandemic, the proposed boutique hotel will create long term employment opportunities and create tourism and accommodation facilities in support of the PPSC PHS. The proximity of the proposed boutique hotel relative to the Club house complex, as gateway/ entry point to the extremely popular Point of Human Origins: Archaeological Tour, is a further positive consideration.

## 7.6 Conclusions

Following from this assessment it is evident that the proposed boutique hotel would be located within the Buffer Zone to the PPSC PHS, within an existing partially-developed urban cluster forming part of the estate. Although the overall building footprint, height and therefore bulk of the proposed boutique hotel would be marginally higher than that associated with the implementation of existing land use rights applicable to the three properties, this would not negatively impact on the PPSC PHS or important archaeological sites forming part of the PHS.

Several vacant residential erven remain within the same urban cluster as the proposed development site and will also be developed some time in the future. As these currently-vacant erven bound onto and overlook the CSBT, any possible views towards the proposed boutique hotel would be obscured. The proposed development would therefore not be visible from e.g. along the CSBT in front of the club house complex or from the boardwalk used by visitors to the Human Origins: Archaeological Tour.

While partial, intermittent, long-distance views of the new building from further along the CSBT may be possible such views would show the new building within the context of an existing urban cluster. Potential visual impacts from the adjoining golf course and/or residences are considered irrelevant from a heritage perspective.

It is noted that land use rights for a hotel, as inferred through the 2002 RoD, have thus far not been implemented. The proposed boutique hotel would therefore fill this gap.

Finally, it was noted that previous archaeological studies point towards the potential of finding less significant archaeological occurrences across the broader landscape (i.e. outside the PPSC PHS) and for this reason it is recommended that a suitably-qualified archaeologist oversee all excavation and earthmoving activities.

## 8. PUBLIC PARTICIPATION PROCESS

The public participation process (PPP) will be conducted in accordance with requirements outlined in the HWC Public Consultation Guidelines, June 2019. The study area is situated within the jurisdiction of Mossel Bay Municipality.

While technically only situated within an area covered by one local conservation body registered with HWC in terms of Section 25 of the National Heritage Resources Act, 1999 (Act 25 of 1999), broader participation as part of the PPP (30 day period) will incorporate the following components:

- Details regarding the proposal to be circulated to the project champion for the "Cradle of Human Culture" (World Heritage Site nomination to UNESCO)
- Details regarding the proposal to be circulated to the local planning authority (Mossel Bay Municipality);
- Details regarding the proposal to be circulated to the local conservation body (Mossel Bay Heritage);
- Formal notices to be published in local press (\_\_\_\_\_) on \_\_\_ February 2021;
- Notice to be installed on the site for the duration of the PPP;
- Notice to be installed at planning helpdesk, Mossel Bay Municipality.

Contact details of interested and affected parties are listed in the table below.

Organisation / Department	Contact Person	Postal Address	E-mail	Contact No
Project Champion The Cradle of Human Culture Office of the Director Museums, Heritage and Geographical Names DCAS, Western Cape Government	Dr. Mariagrazia Galimberti	3 <sup>rd</sup> floor, Protea Assurance Building, Greenmarket Square, Cape Town, 8000	<a href="mailto:Mariagrazia.Galimberti@westerncape.gov.za">Mariagrazia.Galimberti@westerncape.gov.za</a>	021 483 7069/ 072 533 1644
Mossel Bay Municipality (Planning & Economic Development)	Ms. Olga le Roux	-	<a href="mailto:oleroux@mosselbay.gov.za">oleroux@mosselbay.gov.za</a>	044 606 5074
Mossel Bay Heritage	Ms. Carina Wiggill	-	<a href="mailto:heritage@visitmosselbay.co.za">heritage@visitmosselbay.co.za</a>	044 691 2347/ 082 687 9744

**9. RECOMMENDATIONS**

This report satisfies the requirements of Section 38(3) of the NHRA Act 25 of 1999 for a Heritage Impact Assessment, namely:

- 1) Identification and mapping of all heritage resources in the area affected;
- 2) 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;
- 3) **Results of consultation with communities affected by the proposed development and other interested parties regarding the impact of the development on heritage resources.**

It is recommended that HWC endorse the findings of this HIA report including the following Conditions of Approval, to be assimilated into future outcome(s) of the NEMA Part 2 amendment currently underway:

No	Heritage Indicators/ Conditions of Approval
9.1	The applicant must appoint a specialist archaeologist to oversee all excavation and earthmoving activities. The specialist archaeologist must report to the ECO and where appropriate to Heritage Western Cape on a regular basis – Condition 11 of the RoD dated 29 October 2003
9.2	The HWC Chance Fossil Finds Protocol to be implemented and included in the Environmental Management Programme Report

**PERCEPTION Planning**  
**11<sup>th</sup> March 2021**

**SE DE KOCK**  
 Hons (TRP) EIA Mgmt (IRL) PrPln PHP

**LWEBLEY**  
 PhD (UCT), MA (US)

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**SCHEDULE 1: PROJECT TEAM AND STATEMENT OF INDEPENDENCE**

With relation to the authors' appointment as an independent specialists responsible for the compilation of an Integrated Heritage Impact Assessment in terms of Section 38(3) of the National Heritage Resources Act, 1999 (Act 25 of 1999) for this project, it is hereby declared that the undersigned:

- Acts as an independent specialist in this application;
- Regards the information contained in this report as it relates to my specialist input/study to be true and correct;
- Have and will not have any vested interest in the proposed activity proceeding;
- Does 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 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;
- Is 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;
- Is aware that a false declaration is an offence in terms of regulation 48 of GN No. R. 982.

It is certified that L Webley holds a PhD (Archaeology), 1992, University of Cape Town and has 38 years professional experience as an Archaeologist. She is professionally registered/ affiliated with the Association of Southern African Professional Archaeologists (Accredited Principle Investigator for CRM (Stone Age, Coastal Shell Middens and Colonial Archaeology) and Field Director (Burials and Exhumations).

It is certified that SE de Kock has 25 years' professional experience as urban planner (3 years of which were abroad) and 15 years' experience as professional heritage practitioner. He is professionally registered/ affiliated as follows:

- Professional Heritage Practitioner (Association for Professional Heritage Practitioners)
- Professional Planner (South African Council for Planners, South African Planning Institute)

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