

Appendix D: Heritage Screening Assessment

HERITAGE SCREENING REPORT: PROPOSED MIXED-USE DEVELOPMENT ON PORTION 4 OF FARM 6 (DUYKER EILAND), ST HELENA BAY, WESTERN CAPE PROVINCE

Assessment conducted under Section 38 (8) of the National Heritage Resources Act (No. 25 of 1999) as part of an Environmental Impact Assessment

Prepared for:

SRK Consulting (South Africa) (Pty) Ltd

On behalf of:

Oceana Group Limited

Draft for Comment: 18 March 2025



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EXECUTIVE SUMMARY

TerraMare Archaeology (Pty) Ltd was appointed by SRK Consulting (South Africa) (Pty) Ltd, on behalf of Oceana Group Limited, to produce a heritage screening report for a proposed mixed-use development comprising retirement estates, a retail area, lifestyle retail outlets, a petrol station, and a medical facility in St Helena Bay, Saldanha Bay Local Municipality, Western Cape.

This report describes the archaeological and other heritage resources identified during two walkover surveys of the development site, provides an indication of their sensitivity and makes a recommendation as to whether further heritage studies are required as part of the EIA process for the project. The report also addresses the palaeontological sensitivity of the site, and potential intangible heritage sensitivities.

Findings

Palaeontology: Input received from palaeontologist John Pether indicates that the project area is situated on a marine, wave-cut platform which is overlain by shelly, fossiliferous deposits of the Velddrif Formation. These are mainly deposits of the “6 m Raised Beach” of Last Interglacial age, laid down 128-120 thousand years ago when sea level retreated from a high stand which reached about 6 m above sea level.

The geological map indicates an arc of the Velddrif Formation deposit across the base of the Shelly Pont promontory, reminiscent of a “fossil” beach ridge which is a common feature of the Velddrif Formation raised beaches fringing the edge of the coastal plain on the West Coast. However, there is no topographic expression of a beach ridge or outcropping raised beach deposits. Instead, the shelly beach sands and gravels, left behind by the retreating sea, are of greater extent on the marine platform. These beach deposits were reworked by wind, eroding the upper part and producing a palaeosurface upon which both marine and terrestrial fossil bones occur.

Subsequently the Q1 aeolian coversands of the Springfontyn Formation accumulated on the Velddrif Formation and inland lap onto the older Springfontyn Formation Q2 coversand soil. The younger Q1 sands overlie the Velddrif Formation, while older Q2 heuweltjiesveld soil occurs on the higher elevation slopes (>~10 m asl.), where it overlies hillslope bedrock colluvium.

The marine fossil shell content of the Velddrif Formation raised beaches and the ambient fossil fauna (snails, moles, tortoises) in the Springfontyn Formation coversands are of generally of low palaeontological sensitivity. Fossil bones from whales, dolphins, seals and seabirds sparsely scattered within the Velddrif Formation are of moderate sensitivity.

Archaeology: Although the walkover surveys of the proposed development area undertaken by ACO Associates in 2021 and TerraMare Archaeology in 2025 recorded a wide spread of archaeological material across the site, the project area is, generally, archaeologically poor and the visible archaeological sites and material are of relatively low archaeological significance.

The surveys recorded only one very ephemeral scatter of lithics which can be described as a site. Otherwise, finds consisted of isolated stone artefacts, mostly belonging to the Later Stone Age, with a few, more weathered artefacts that may date from the Middle Stone Age. No Early Stone Age artefacts were recorded anywhere on the proposed development site.

Of the land parcels surveyed in 2025, only occasional scattered flaked stone – mainly derived from beach cobbles – was recorded on the steep hillsides parallel to the coast on the two

easternmost properties. Archaeological marine shell was almost entirely absent here, and no other archaeological material like bone, pottery or charcoal was noted. The archaeological material encountered in other areas of the development site surveyed in 2025 is similar to what was found in 2021 on the proposed SPV facility site but more ephemeral, consisting of patchy, thin scatters of very broken marine shell with occasional pre-colonial lithic artefacts, almost exclusively dating from the LSA. Like on the SPV site, most of the marine shell found in these areas of the proposed development site occurred in dunemole burrow casts, which suggests the presence of buried archaeological sites in places in these areas.

Historical Sites and Built Environment: In terms of historical and built heritage sites, the 2021 survey for the Solar Photovoltaic facility identified a disused and largely ruinous aircraft landing strip and some possible items of associated infrastructure on the site proposed for that development. Based on a comparison of historical mapping, the airstrip was built between 1964 and 1971. The runway and its associated structures are thus currently less than 60 years old, and not subject to protection under the National Heritage Resources Act. This runway has been excluded from the footprint of the proposed mixed-use development and will not be impacted by the proposals.

No other extant built structures were noted on the remainder of the proposed development site during the 2025 TerraMare Archaeology survey. The only possibly historical remains encountered were a small, concrete slab (J010) surrounded by a scatter of shell and charcoal, and a handful of 19th century ceramic shards found in a dunemole burrow cast approximately 70 m away.

Graves and Burials: Noted during the 2021 survey for the proposed SPV facility, but then outside the project area, a historical cemetery was recorded during the 2025 site visit on the portion of the development area on eastern side of the Shelly Point road.

The cemetery is still partially fenced but seems not to have been recently used. Most of the legible gravestone date to the period between 1873 and 1912, although a headstone with the date 1987 was noted. TerraMare Archaeology counted at least 100 identifiable graves within the fenced area - some marked with formal headstones, others with rocks simply marking the head and foot of the grave and yet others on the eastern edge of the graveyard covered by packed stone.

Although no graves were identified elsewhere within the project footprint during the walkover surveys, it is possible that unmarked, particularly pre-colonial burials could be present within the development area. This is evidenced by the accidental discovery of two pre-colonial human burials during development projects in the coastal strip in Britannia Bay and around Shelley Point (Orton, 2019; HWC pers. comm.).

Overall, the cultural landscape of the proposed development area is one that is already substantially altered and rapidly changing with a mix of expanding residential to the west and north-east, and industrial along the coast of St Helena Bay to the north. Only the rural landscape to the south-east of the site retains some of its historical landscape character.

Conclusions

The proposed mixed-use development site is an area of generally low palaeontological sensitivity and should not constrain the proposed development, provided suitable measures to mitigate any impacts are implemented.

Archaeological sites generally are limited in extent and have much smaller constraints footprints on development than those applicable to biodiversity or ecology, for example. It is generally possible to either avoid (by excluding the affected site from the proposed

development) or mitigate (through archaeological intervention such as recording, sampling or excavation) impacts on archaeological sites where they are found to be present within the development footprint. The presence of archaeological resources within a development area is seldom a fatal flaw and it is very unlikely to be the case for the St Helena Bay mixed-use project, provided suitable mitigation measures are implemented.

Although historical graves and burials are extremely sensitive heritage receptors, their presence within a project area is not necessarily a fatal flaw, provided they are excluded from impacts from the development and are sensitively treated. The exhumation of a graveyard as part of a development process, while possible, is costly and can be extremely contentious. The graveyard recorded within the mix-use project area (and perhaps a buffer around it) should thus be excluded from the development footprint.

With respect to unmarked, usually pre-colonial graves, they too are an extremely sensitive and often contested heritage resource, and it is generally impossible to predict their presence in advance of development. However, the inclusion in the project EMP of a procedure for reporting and dealing with chance finds of human remains will ensure that the sensitivity of the development area with respect to this potential heritage resource is low and that they will not be a fatal flaw.

The cultural landscape within which the mixed-use development is being proposed has been heavily altered by recent and ongoing, mainly residential, development and is of relatively low cultural significance. While the existing landscape will be fundamentally changed by the proposed development, this is part of a process already well underway in the area.

It is possible that the intangible heritage claims made by I&APs in relation to the proposed SPV project will also be raised in relation to this proposed mixed-use development. It is, by definition, often difficult to substantiate claims of intangible heritage associated with a site or place, except where objective information is available in relation to the claims made. If intangible heritage issues are raised during the EIA process for this development, these will need to be addressed and assessed on their individual merits and according to what information is available.

The production and submission of a Notice of intent to Develop (NID) to HWC is a requirement for a development such as this, which triggers Section 38 of the NHRA. The formal HWC response to the NID application will set out what their requirements are in terms of the heritage studies they require to be conducted as part of the EIA process for the project. Based on the information set out in this screening report, it should be expected, however, that HWC will request a Heritage Impact Assessment for the St Helena Bay mixed-use development, as part of the project EIA process for the project.

Table of Contents

EXECUTIVE SUMMARY	2
Findings	2
Conclusions	3
GLOSSARY.....	7
ABBREVIATIONS.....	8
1 INTRODUCTION.....	9
1.1 Terms of Reference	9
1.2 The Author	10
2 METHODOLOGY.....	10
2.1 Study Area.....	10
2.2 Sources of Information.....	10
2.3 Site Visits.....	11
2.4 Grading and Site Sensitivity	12
2.5 Restrictions and Assumptions.....	13
3 RECEIVING ENVIRONMENT.....	13
4 HERITAGE SENSITIVITIES OF THE DEVELOPMENT SITE	13
4.1 Palaeontology.....	13
4.2 Archaeology.....	15
4.3 Historical Sites and Built Environment	19
4.4 Graves and Burials	20
4.5 Cultural Landscape.....	22
4.6 Intangible Heritage	22
5 OPPORTUNITIES AND CONSTRAINTS.....	23
6 CONCLUSIONS.....	24
7 REFERENCES.....	25
APPENDIX A: SPECIALIST DECLARATION.....	27
APPENDIX B: CURRICULUM VITAE – JOHN GRIBBLE.....	28
APPENDIX C: ARCHAEOLOGICAL AND PALAEONTOLOGICAL SITES RECORDED DURING THE 2021	
ACO ASSOCIATES AND 2025 TERRAMARE ARCHAEOLOGY FIELD SURVEYS.....	37

Figure 1: Proposed extent of the St Helena Bay mixed-used development (red polygons) within the wider area of Portion 4 of Farm 6, Duyker Eiland (blue polygon (Source: 1:50 000 chart 3217DD-DB, 2010, National Geo-spatial Information, <http://www.ngi.gov.za>). 9

Figure 2: Study area for this screening report comprising the proposed project footprint shown as the red polygons (Source: Google Earth). 11

Figure 3: 2021 survey tracks recorded by ACO Associates (blue lines) in 2021 and by TerraMare Archaeology (yellow lines) in 2025 within the proposed mixed-use development

footprint (red polygons) (Source: Google Earth).....	12
Figure 4: Subsurface extent of the Velddrif Fm (left) and the subsequent Q1 & Witzand sands (right).	14
Figure 5: The development boundaries overlaid on the geological chart of the area (left) and the SAHRIS palaeosensitivity layers (right) (Sources: Geological Survey 1: 250 000 map 3218 Cape Town and https://sahris.sahra.org.za/map/palaeo).	14
Figure 6: Northern half of the proposed development area showing the occurrences of archaeological material recorded by the 2021 and 2025 surveys. White numbered points indicate material which was graded 3C, while yellow points represent material which was considered ungradable (Source: Google Earth).	17
Figure 7: South-eastern half of the proposed development area showing the occurrences of archaeological material recorded by the 2021 and 2025 surveys. White numbered points indicate material which was graded 3C, while yellow points represent material which was considered ungradable (Source: Google Earth).	18
Figure 8: Satellite image of the runway (within the yellow polygon) showing its position outside the current development area (red polygons) (left) and photograph of the runway taken during the 2021 site visit (Photo: J Gribble).....	19
Figure 9: Location of the cemetery (blue polygon) identified during the archaeological surveys of the proposed development area (Source: Google Earth).....	20
Figure 10: Extract from the Winter and Oberholzer (2013) map of the West Coast indicating their demarcations and gradings of the landscape elements in the vicinity of the proposed mixed-used development site. The Da Gama Monument is the upper yellow square (Source: Winter and Oberholzer (2013)).....	23
 Plate 1: Typical trench exposure in the vicinity of the development area showing the shelly sands of the Velddri Formation overlain by the sandy Springfontyn Formation (Photo: John Pether).	15
Plate 2: Cemetery and examples of grave types and gravestones recorded during the archaeological walkover survey conducted in February 2025 (Photos: J Gribble / G Euston-Brown)	21

GLOSSARY

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

Early Stone Age: Period of the Stone Age extending between approximately 2 million and 200 000 years ago.

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

Heritage: That which is inherited and forms part of the National Estate, as defined by the National Heritage Resources Act 25 of 1999.

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

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

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

Quaternary: The geologic time period that encompasses the most recent 2.6 million years. It comprises the Pleistocene (2.6 Ma – 10,000 years ago) and the Holocene (10,000 years ago to the present) and is characterised by a series of global glacial cycles.

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

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

ABBREVIATIONS

asl	Above sea level
EIA	Environmental Impact Assessment
GPS	Global Positioning System
HIA	Heritage Impact Assessment
HWC	Heritage Western Cape
ka	Thousand years ago
LIG	Last Interglacial
LSA	Later Stone Age
MSA	Middle Stone Age
NHRA	National Heritage Resources Act (No 25 of 1999)
SAHRA	South African Heritage Resources Agency
SPV	Solar Photovoltaic
SAHRIS	South African Heritage Resources Information System

1 INTRODUCTION

TerraMare Archaeology (Pty) Ltd was appointed by SRK Consulting (South Africa) (Pty) Ltd, on behalf of Oceana Group Limited, to produce a heritage screening report for a proposed mixed-use development comprising retirement estates, a retail area, lifestyle retail outlets, a petrol station, and a medical facility in St Helena Bay, Saldanha Bay Local Municipality, Western Cape (Figure 1).

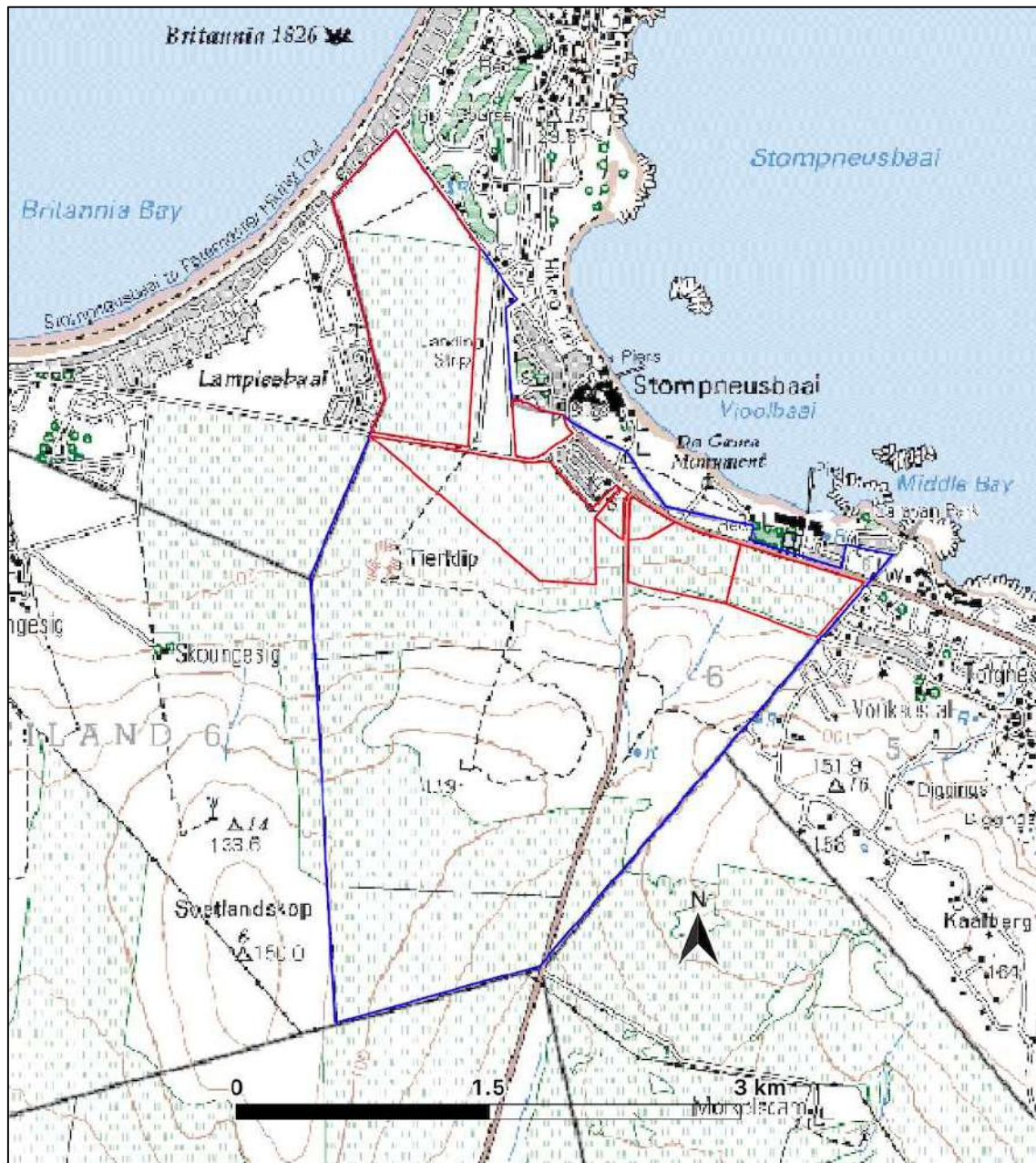


Figure 1: Proposed extent of the St Helena Bay mixed-used development (red polygons) within the wider area of Portion 4 of Farm 6, Duyker Eiland (blue polygon) (Source: 1:50 000 chart 3217DD-DB, 2010, National Geo-spatial Information, <http://www.ngi.gov.za>).

1.1 Terms of Reference

This report describes the archaeological and other heritage resources identified during two walkover surveys of the development site. The report also addresses the palaeontological

sensitivity of the site, and potential intangible heritage sensitivities.

The report provides an indication of the sensitivity of heritage resources on the site and makes a recommendation as to whether further heritage studies are required as part of the EIA process for the project.

1.2 The Author

John Gribble has an MA (UCT, 1989), in archaeology and has been working in cultural resource management since the early 1990s. He has worked in both the regulatory and commercial heritage management fields: the former during 13 years at the National Monuments Council / South African Heritage Resources Agency (SAHRA), and the latter as both a terrestrial and maritime archaeological consultant in South Africa and the UK.

He holds archaeological accreditation with the Association of Southern African Professional Archaeologists CRM section (Member #43) as follows:

- Principal Investigator: Maritime Archaeology and Colonial Archaeology; and
- Field Director: Stone Age Archaeology.

A signed and certified specialist statement of independence is attached to this scoping report as Appendix A and the author's CV is attached as Appendix B.

2 METHODOLOGY

This scoping report aims to provide a general description of the known and potential heritage sensitivities of the project site and to flag any heritage-related fatal flaws to the proposed Oceana mixed-use development.

The National Heritage Resources Act (No 25 of 1999) (NHRA) defines the range and extent of what are considered to be South Africa's heritage resources. At its broadest, according to Section 2(xvi) of the Act, a heritage resource is "any place or object of cultural significance". This means that the object or place has aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance.

In terms of the definitions provided in Section 2 of the NHRA, heritage resources potentially present on the development site which may be impacted by the proposed development include:

- Palaeontological resources;
- Pre-colonial archaeological sites and materials;
- Colonial era archaeological sites and materials;
- Rock paintings and / or rock engravings;
- Historical built structures; and
- Graves and burials.

2.1 Study Area

The study area for this screening report comprises the proposed project footprint proposed shown on Figure 2.

2.2 Sources of Information

This scoping report relies on a range of primary and secondary information to provide a high-level assessment of the potential palaeontological, archaeological and other heritage sensitivities of the development site.

The sources of information used include:

- Historical and current 1:50 000 topographic maps of the study area and immediate surrounds.
- The current 1:250 000 geological chart for the area.
- Historical aerial photography of the study area and immediate surrounds.
- Historical survey diagrams.
- Previous impact assessments for any developments in the vicinity of the study area.
- Historical and current literature describing the study area and any relevant aspects of cultural heritage.

These information sources, used in conjunction with the results of the site visits have allowed a description of the heritage potential and sensitivities of the project site.



Figure 2: Study area for this screening report comprising the proposed project footprint shown as the red polygons (Source: Google Earth).

2.3 Site Visits

In addition, two site inspections of the project area have been conducted. A survey of the portion of the development area which was subject to a proposal to develop a solar photovoltaic (SPV) facility, was surveyed by John Gribble and Gail Euston-Brown by ACO Associates on 8 November 2021 (Gribble, 2022).

More recently the remainder of the mixed-use project area was surveyed by John Gribble and

Gail Euston-Brown of TerraMare Archaeology on 2 February 2024.

Both John Gribble and Gail Euston-Brown are experienced field archaeologists, and heritage resources identified during both site visits were recorded on Garmin GPS units (GPSMap 62s) carried by the field team, by site descriptions recorded while in the field and photographically, when pertinent.

The survey track plots recorded during both site visits are shown in Figure 3.



Figure 3: 2021 survey tracks recorded by ACO Associates (blue lines) in 2021 and by TerraMare Archaeology (yellow lines) in 2025 within the proposed mixed-use development footprint (red polygons) (Source: Google Earth).

No palaeontological field assessment has been conducted, partly because it was unlikely that that new pertinent information about the subsurface of the development site would be visible, and partly because of John Pether's familiarity with the scientific literature pertaining to the geology and palaeontology of the coastal plains of the West Coast, and previous observations of natural and ephemeral exposures along the coast of St. Helena Bay.

2.4 Grading and Site Sensitivity

Section 7(2) of the National Heritage Resources Act (NHRA) requires that provincial authorities formulate a system for the grading of heritage resources. Heritage Western Cape (HWC) has formulated a grading system for archaeology and palaeontology which is applied

in the Western Cape, where it is the statutory commenting authority.

Sites of local heritage significance form the Grade 3 tier of the system, with those of high local significance designated as Grade 3A. Those of medium or low local significance are designated Grades 3B and 3C respectively.

It is generally assumed that Grade 3A heritage resources should be preserved in their entirety, while Grade 3B and 3C sites can be mitigated or part preserved, as appropriate.

Resources which do not meet the Grade 3 criteria are referred to as Not Conservation-Worthy, although this author prefers the term “Ungradable”, and this is used in this report. Generally, ungradable heritage resources require no further action or mitigation in respect of development proposed on a site.

2.5 Restrictions and Assumptions

The 2021 and 2024 field surveys observed the surface only and any completely buried archaeological sites or material will not have been recorded. The degree of survey coverage was, in part, a reflection of the density of archaeological and other heritage sites present in the development area and, therefore, has provided a good picture of the heritage resources present.

Although we believe that most of the relevant archaeological assessments and HIAs from the area have been located and reviewed, it is acknowledged that, particularly, recent (post-2010) heritage reports from the Western Cape do not generally appear on the SAHRIS database and that may mean that some recent reports may not have been identified for review.

With respect to palaeontology, and for the reasons indicated above, no fieldwork has been conducted on the project site. For this desktop screening exercise, the palaeontologist's familiarity with the scientific literature pertaining to the geology and palaeontology of the coastal plains, together with his own observations of natural and ephemeral exposures along the coast of St. Helena Bay were deemed to be sufficient.

3 RECEIVING ENVIRONMENT

The Portion 4 of Farm 6 proposed for the mixed-use development is located on the lower slopes of the hills of the Vredenburg Peninsula overlooking St Helena Bay and on relatively flat land behind the coastal dune cordon.

The property comprises agricultural land, bordered in the north and west by residential urban development.

The site is largely covered in thick, pale reddish/white sand, but calcrete outcrops on the hillsides, and granite bedrock, is visible in places.

4 HERITAGE SENSITIVITIES OF THE DEVELOPMENT SITE

This section describes the known and potential heritage sensitivities of the proposed mixed-use development site as they are currently understood.

4.1 Palaeontology

The project area is situated on a marine, wave-cut platform which is overlain by shelly, fossiliferous deposits of the Velddrif Formation (Figure 4, left). These are mainly deposits of the “6 m Raised Beach” of Last Interglacial (LIG) age, laid down 128-120 thousand years ago (ka) when sea level retreated from a high stand which reached about 6 m above sea level

(asl). Just inland may be erosional remnants of the older “12 m Raised Beach” deposited around 400 ka.

The geological map (Figure 5 left) indicates an arc of the Velddrif Formation deposit across the base of the Shelly Pont promontory, reminiscent of a “fossil” beach ridge which is a common feature of the Velddrif Formation raised beaches fringing the edge of the coastal plain on the West Coast. However, there is no topographic expression of a beach ridge or outcropping raised beach deposits. Instead, the shelly beach sands and gravels, left behind by the retreating sea, are of greater extent on the marine platform, as indicated in Figure 4 (left).

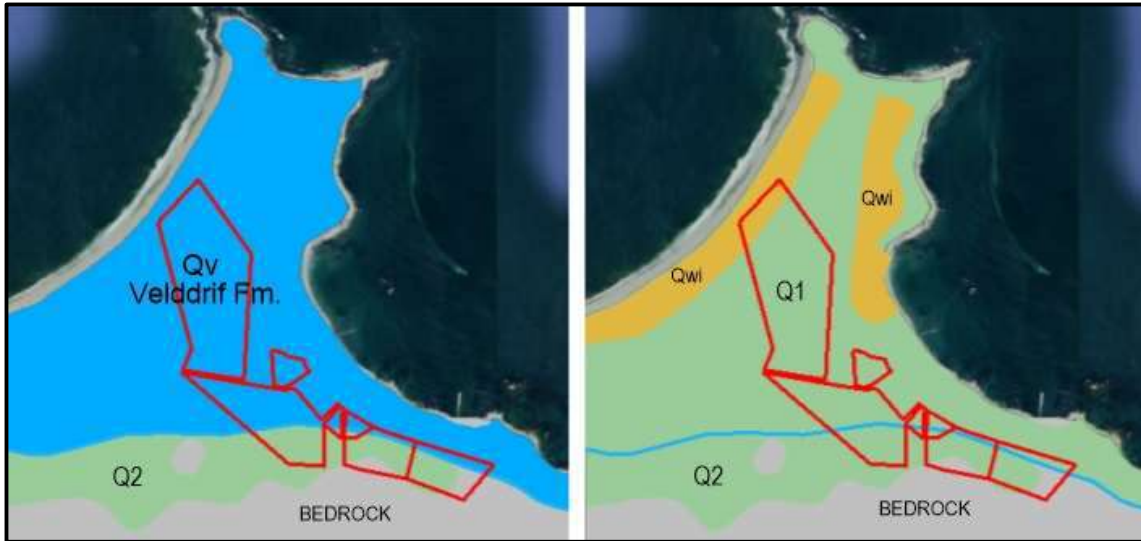


Figure 4: Subsurface extent of the Velddrif Fm (left) and the subsequent Q1 & Witzand sands (right).

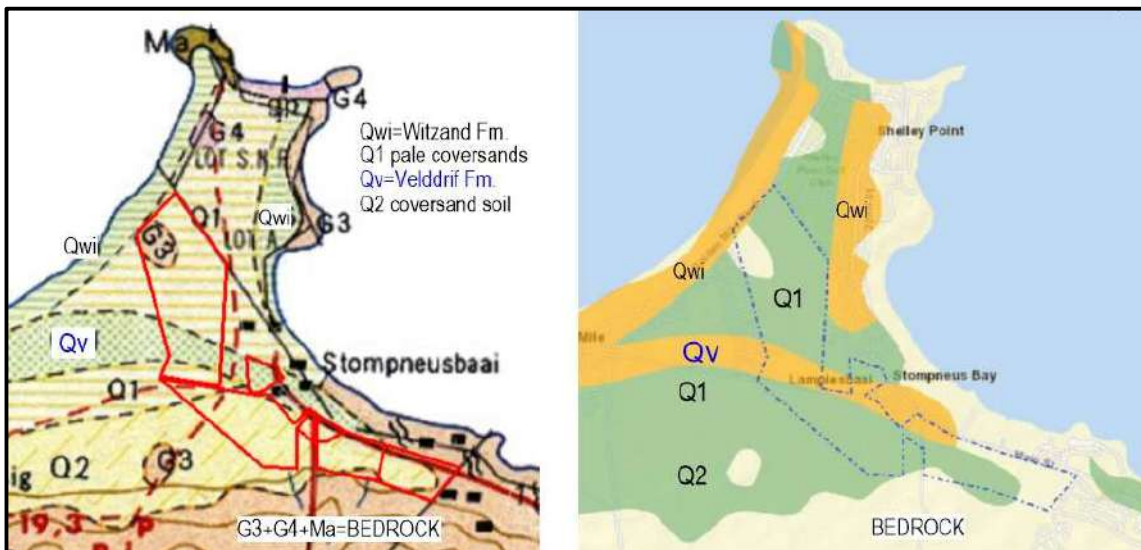


Figure 5: The development boundaries overlaid on the geological chart of the area (left) and the SAHRIS palaeosensitivity layers (right) (Sources: Geological Survey 1: 250 000 map 3218 Cape Town and <https://sahris.sahra.org.za/map/palaeo>).

These beach deposits were reworked by wind, eroding the upper part and producing a palaeosurface upon which both marine and terrestrial fossil bones occur (Plate 1).

Subsequently the Q1 aeolian coversands of the Springfontyn Formation accumulated on the

Velddrif Formation and inland lap onto the older Springfontyn Formation Q2 coversand soil. As indicated on Figure 4 and Figure 5, the younger Q1 sands overlie the Velddrif Formation “6 m Raised Beach”, while older Q2 heuweltjiesveld soil occurs on the higher elevation slopes (>~10 m asl.), where it overlies hillslope bedrock colluvium.

The marine fossil shell content of the Velddrif Formation raised beaches and the ambient fossil fauna (snails, moles, tortoises) in the Springfontyn Formation coversands are of generally of low palaeontological sensitivity. Fossil bones from whales, dolphins, seals and seabirds sparsely scattered within the Velddrif Formation are of moderate sensitivity.

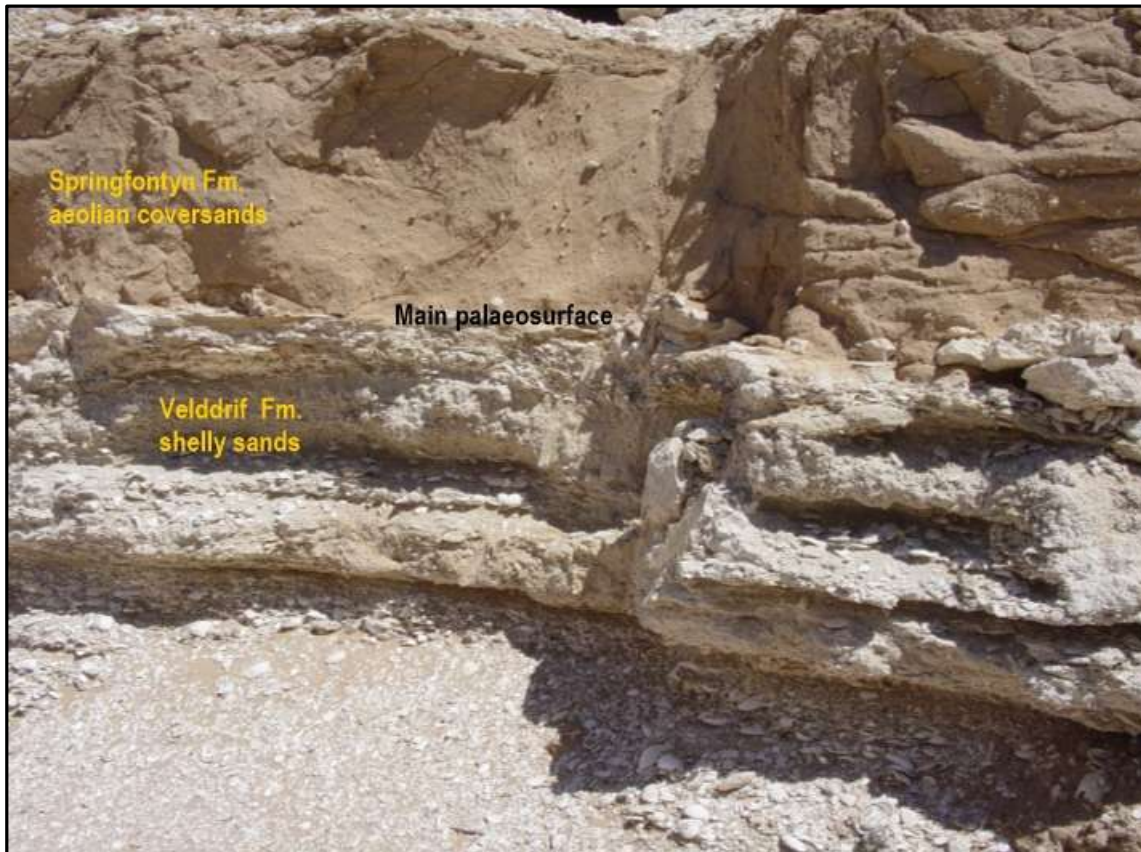


Plate 1: Typical trench exposure in the vicinity of the development area showing the shelly sands of the Velddrif Formation overlain by the sandy Springfontyn Formation (Photo: John Pether).

4.2 Archaeology

The West Coast of South Africa has been settled for at least 100 000 years. There are shell middens dating to the Middle Stone Age (MSA) both on, and to the north and south of the Vredenburg peninsula (Halkett & Hart 1993, Halkett et al 2003, Klein et al. 2004, Berger and Parkington 2005a,b). Associated with these middens are MSA stone artefacts and an anatomically modern human tooth from the Sea Harvest site (Grine & Klein 1993), and other anatomically modern post-cranial remains from Hoedjiespunt, all clearly older than 50 000 years. The presence of the so-called Saldanha skull fragment and the not infrequent finds of distinctive ESA artefacts, including handaxes, attests to a much more ancient use of the area, although, the coastal morphology has changed over time.

Hunter-gatherers living on the west coast of South Africa during the latter part of the Holocene made use of the coastal resources (perhaps seasonally). Archaeological excavations at sites such as Duyker Eiland on the coast near Britannia Bay (Robertshaw 1979) confirm the importance of shellfish such as mussel and limpet in the diet forming a dependable and easily

accessible protein resource during these times. In addition, the excavations of other sites on the Vredenburg peninsula have confirmed the importance of coastal resources such as seals, marine birds, crayfish and beached whales (see Bateman 1946; Buchanan et al. 1978; Cronin & Thackeray 1975; Rudner 1968).

The archaeological sites on the Vredenburg Peninsula date predominantly to the later part of the Stone Age, although earlier material dating to the mid-late mid Holocene provides evidence of the occupation of the area by early San hunter-gatherers. The broad survey of the Vredenburg Peninsula by Sadr (2009) identified at least 99 archaeological sites occurring predominantly around granite koppies, with many more found in open wheat fields during ongoing commercial archaeological impact assessment surveys (Hart et al 2005; Orton & Hart 2011; Orton 2009, Webley et al. 2010).

Although the walkover surveys of the proposed development area undertaken by ACO Associates in 2021 and TerraMare Archaeology in 2025 recorded a wide spread of archaeological material across the site, the project area is, generally, archaeologically poor and the visible archaeological sites and material are of relatively low archaeological significance. The locations of the occurrences of archaeological material recorded by the two surveys are shown on Figure 6 and Figure 7 and all findspots are described in Appendix C.

The surveys recorded only one very ephemeral scatter of lithics which can be described as a site (J029). Otherwise, finds consisted of isolated stone artefacts, mostly belonging to the Later Stone Age, with a few, more weathered artefacts that may date from the Middle Stone Age.

On the site proposed for the SPV facility surveyed in 2021, the material encountered consisted of scatters of marine shell of varying density and extent, with occasional associated flaked stone. A single small fragment of Khoi pottery was noted at one findspot (G018) very close to the southern boundary of the property. No bone, charcoal or other archaeological material was recorded at any of the scatters.

The shell was a mix of black mussel and various limpet species, all of which would have been readily available from the rocky seashore outcrops along the coast surrounding the site. The mix of shell species appeared to differ from occurrence to occurrence, with some scatters dominated by mussel and others by limpets. The degree of fragmentation of the shell also differed between occurrences with very broken up shell in some areas and much more intact shell in others.

On this land parcel, lithics were the exception rather than the rule and most were found in the shell scatters on the northern half of the property, outside the area identified for the SPV. The lithics appear to be Later Stone Age (LSA) in date, and most are flakes and chunks. Quartz is the dominant raw material with a substantially lower number of silcrete artefacts present. Other raw materials were represented by a single, large, retouched quartzite flake (J029), and two pieces of flaked black granite. No Early Stone Age artefacts were recorded anywhere on the proposed development site.

Of the land parcels surveyed in 2025, only occasional scattered flaked stone – mainly derived from beach cobbles – was recorded on the steep hillsides parallel to the coast on the two easternmost properties. Archaeological marine shell was almost entirely absent here, and no other archaeological material like bone, pottery or charcoal was noted.

The archaeological material encountered in other areas of the development site surveyed in 2025 is similar to what was found in 2021 on the proposed SPV facility site but more ephemeral, consisting of patchy, thin scatters of very broken marine shell with occasional pre-colonial lithic artefacts, almost exclusively dating from the LSA. Like on the SPV site, most of

the marine shell found in these areas of the proposed development site occurred in dunemole burrow casts, which suggests the presence of buried archaeological sites in places in these areas.

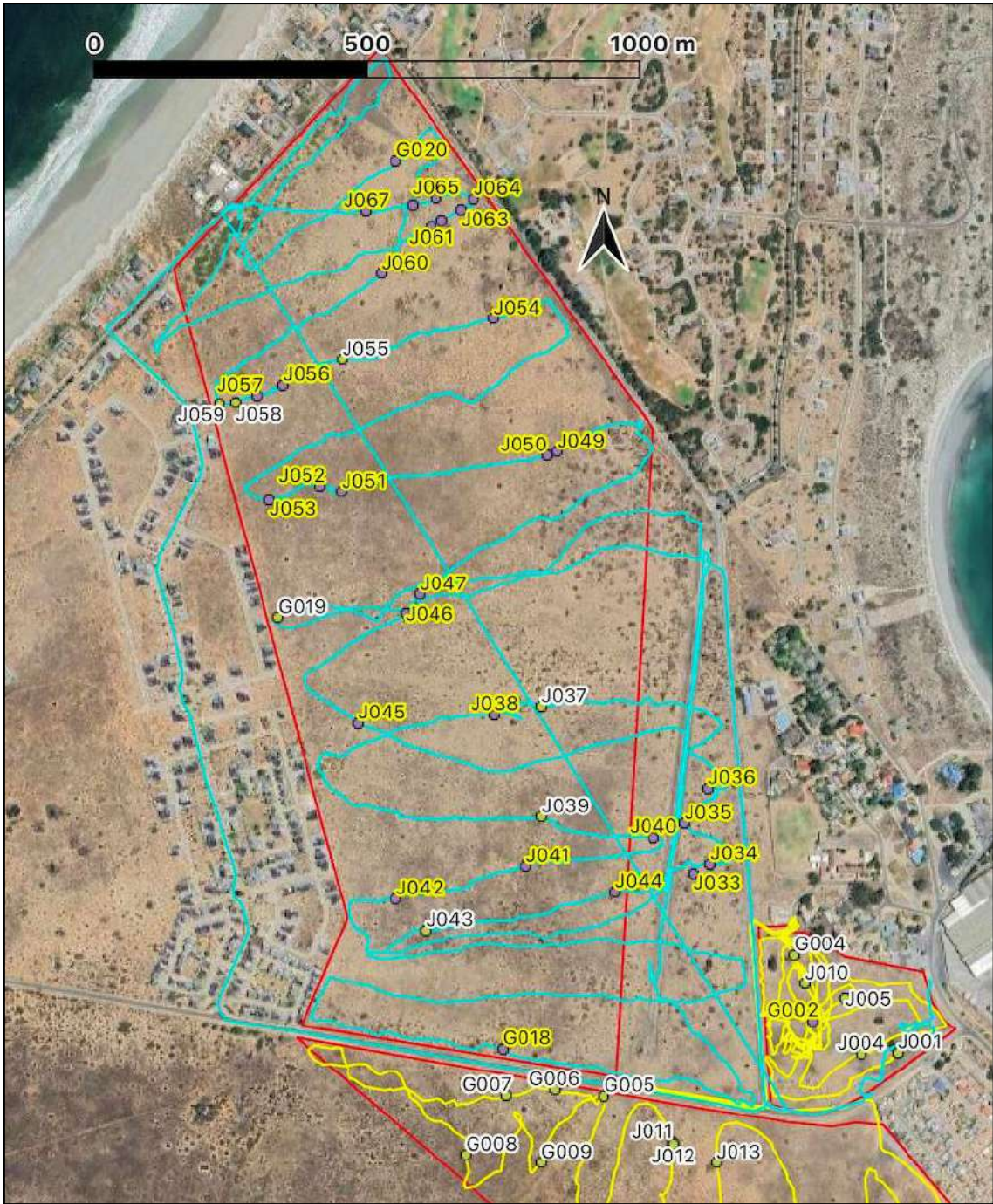


Figure 6: Northern half of the proposed development area showing the occurrences of archaeological material recorded by the 2021 and 2025 surveys. White numbered points indicate material which was graded 3C, while yellow points represent material which was considered ungradable (Source: Google Earth).



Figure 7: South-eastern half of the proposed development area showing the occurrences of archaeological material recorded by the 2021 and 2025 surveys. White numbered points indicate material which was graded 3C, while yellow points represent material which was considered ungradable (Source: Google Earth).

4.3 Historical Sites and Built Environment

St Helena Bay enters the written historical record on 7 November 1497 when the Portuguese explorer, Vasco da Gama made his first landfall in southern Africa on the shores of the bay. Da Gama reported a wide bay backed by low-lying plains (Cliff, 2011).

After Da Gama's departure, St Helena Bay was next visited by European ships more than a century later when the Dutch fleet of Cornelis de Houtman stopped there in November 1598 (Sleigh, 1993). Although visitors to the bay remark that it was a rich fishery (in later years it was the centre of a major whaling fishery), a lack of fresh water sources ashore, and the other supplies required by passing ships meant that the bay was infrequently visited.

In 1733, in response to reports that the French East India Company was investigating the area as a possible refreshment station, the Dutch authorities at the Cape made enquiries of the free burgher farmers who had already settled around the coast of St Helena Bay about the best place in the area to establish a Company buitepos or outpost. The following year, these farmers (H O Eksteen, J Coljin and J Cruijwagen) helped to set up the buitepos below Patysberg in the south-western corner of the bay (Sleigh, 1993). By the end of the first quarter of the 18th century, therefore, it appears that the area around St Helena Bay was already being farmed by European settlers.

It has not been possible to access the original land grant and survey diagram for Duiker Eiland, but the Surveyor General diagram (2052/1921) for a subdivision of the farm (**Error! Reference source not found.**), refers to the parent farm being originally granted to DJ Morkel and others on 31 January 1831.

In terms of historical and built heritage sites, the 2021 survey for the SPV facility identified a disused and largely ruinous aircraft landing strip and some possible items of associated infrastructure on the site proposed for that development. Based on a comparison of historical mapping, the airstrip was built between 1964, when it is not indicated on the 1:50 000 topographic map of the area, and 1971, when it is visible on aerial photography. The runway and its associated structures are thus currently less than 60 years old, and not subject to protection under the NHRA. This runway has been excluded from the footprint of the proposed mixed-use development and will not be impacted by the proposals (Figure 8).



Figure 8: Satellite image of the runway (within the yellow polygon) showing its position outside the current

development area (red polygons) (left) and photograph of the runway taken during the 2021 site visit (Photo: J Gribble).

No other extant built structures were noted on the remainder of the proposed development site during the 2025 TerraMare Archaeology survey. The only possibly historical remains encountered were a small, concrete slab (J010) surrounded by a scatter of shell and charcoal, and a handful of 19th century ceramic shards found in a dunemole burrow cast approximately 70 m away (J005).

4.4 Graves and Burials

Noted during the 2021 survey for the proposed SPV facility, but then outside the project area, a historical cemetery was recorded during the 2025 site visit on the portion of the development area on eastern side of the Shelly Point road (Figure 9).

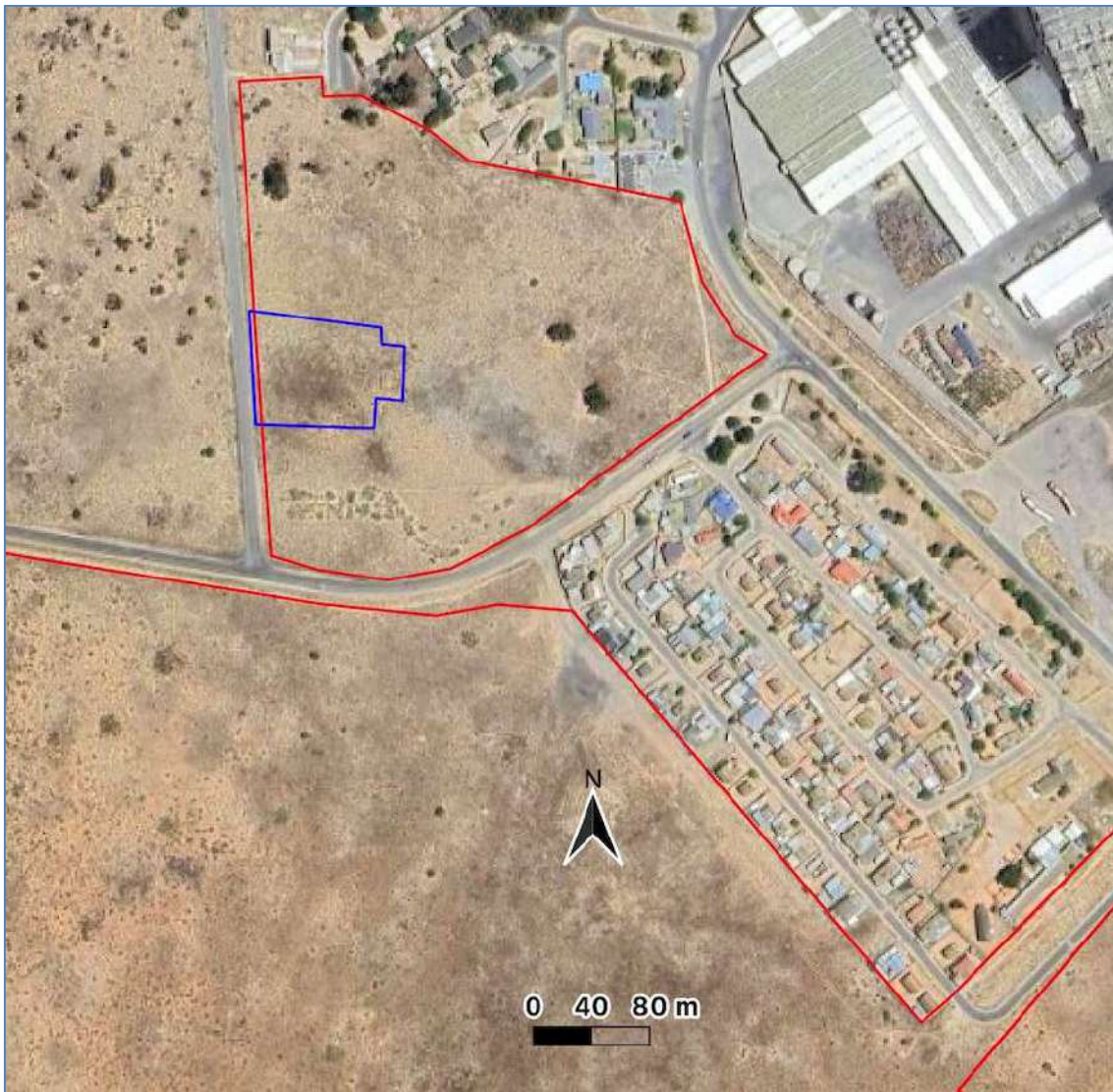


Figure 9: Location of the cemetery (blue polygon) identified during the archaeological surveys of the proposed development area (Source: Google Earth).



Plate 2: Cemetery and examples of grave types and gravestones recorded during the archaeological walkover survey conducted in February 2025 (Photos: J Gribble / G Euston-Brown)

The cemetery is still partially fenced but seems not to have been recently used. Most of the legible gravestone date to the period between 1873 and 1912, although a headstone with the date 1987 was noted. TerraMare Archaeology counted at least 100 identifiable graves within the fenced area - some marked with formal headstones, others with rocks simply marking the head and foot of the grave and yet others on the eastern edge of the graveyard covered by packed stone (Plate 2 above).

Although no graves were identified elsewhere within the project footprint during the walkover surveys, it is possible that unmarked, particularly pre-colonial burials could be present within the development area. This is evidenced by the accidental discovery of two pre-colonial human burials during development projects in the coastal strip in Britannia Bay and around Shelley Point (Orton, 2019; HWC pers. comm.).

4.5 Cultural Landscape

The historical mapping and aerial photographs of the area indicate that the proposed development site was rural and agricultural, with small nodes of coastal development associated with the fishing industry until relatively recently. This has changed markedly in roughly the last three decades with a marked growth in residential developments such as at Shelley Point, Lampiesbaai and Britannia Bay, to the extent that the proposed development area now falls within defined St Helena Bay urban edge.

Winter and Oberholzer (2013) have defined the coastline of the Vredenburg Peninsula, including the development site, as a water landscape (Cwl.5) with a landscape grading of Grade 3 which arises from its high scenic and recreational value (Figure 10). The peninsula also forms part of an archaeological landscape (Cal.1), while the unpaved gravel road between Vredenburg and Stompneus Bay is marked as a scenic route of secondary importance and the Da Gama Monument is indicated as a Grade 3 local heritage site (Figure 10).

The West Coast Guriqua Bloodline Council (WCGBC), in comments on the 2022 HIA for the proposed SPV facility, made the claim that the SPV site was sacred and also that it represents the locus of a historical battle between the Khoi and the Portuguese (see next section). These claims potentially add layers to the cultural landscape, and although neither has been supported by concrete evidence, they were considered in the assessment of impacts to the cultural landscape in the 2022 HIA (Gribble, 2022).

Overall, the cultural landscape of the proposed development area is one that is already substantially altered and rapidly changing with a mix of expanding residential to the west and north-east, and industrial along the coast of St Helena Bay to the north. Only the rural landscape to the south-east of the site retains some of its historical landscape character.

4.6 Intangible Heritage

As mentioned in the previous section, a claim was made during the public participation exercise for the SPV facility that the site of a skirmish between the Khoi and Vasco da Gama's ships was on that site.

The historical documents indicate that on Sunday 12 November 1497, after one of Da Gama's men, had visited ashore with the local people, there seems to have been some sort of disagreement, and he was pursued back to the beach. The boat sent to take him off the beach was pelted with stones, spears and arrows and Da Gama and three or four others were injured. Da Gama responded by ordering his crossbowmen to fire toward the shore (Ravenstein, 1898; Cliff, 2011) but there is no indication in his journal of whether there were casualties among the indigenous group.

Based on the information above, it seems that the crossbowmen did not go ashore but fired

towards the shore from the ships and that this skirmish played out on the beach adjacent to where the Portuguese ships were anchored, rather than further afield in the surrounding landscape.



Figure 10: Extract from the Winter and Oberholzer (2013) map of the West Coast indicating their demarcations and gradings of the landscape elements in the vicinity of the proposed mixed-used development site. The Da Gama Monument is the upper yellow square (Source: Winter and Oberholzer (2013))

5 OPPORTUNITIES AND CONSTRAINTS

The proposed mixed-use development site is an area of generally low palaeontological sensitivity and should not constrain the proposed development, provided suitable measures

to mitigate any impacts are implemented.

Archaeological sites generally are limited in extent and have much smaller constraints footprints on development than those applicable to biodiversity or ecology, for example. It is generally possible to either avoid (by excluding the affected site from the proposed development) or mitigate (through archaeological intervention such as recording, sampling or excavation) impacts on archaeological sites where they are found to be present within the development footprint. The presence of archaeological resources within a development area is seldom a fatal flaw and it is very unlikely to be the case for the St Helena Bay mixed-use project, provided suitable mitigation measures are implemented.

Although historical graves and burials are extremely sensitive heritage receptors, their presence within a project area is not necessarily a fatal flaw, provided they are excluded from impacts from the development and are sensitively treated. The exhumation of a graveyard as part of a development process, while possible, is costly and can be extremely contentious. The graveyard recorded within the mixed-use project area (and perhaps a buffer around it) should thus be excluded from the development footprint.

With respect to unmarked, usually pre-colonial graves, they too are an extremely sensitive and often contested heritage resource, and it is generally impossible to predict their presence in advance of development. However, the inclusion in the project EMP of a procedure for reporting and dealing with chance finds of human remains will ensure that the sensitivity of the development area with respect to this potential heritage resource is low and that they will not be a fatal flaw.

The cultural landscape within which the mixed-use development is being proposed has been heavily altered by recent and ongoing, mainly residential, development and is of relatively low cultural significance. While the existing landscape will be fundamentally changed by the proposed development, this is part of a process already well underway in the area.

It is possible that the intangible heritage claims made by I&APs in relation to the proposed SPV project will also be raised in relation to this proposed mixed-use development. It is, by definition, often difficult to substantiate claims of intangible heritage associated with a site or place, except where objective information is available in relation to the claims made. If intangible heritage issues are raised during the EIA process for this development, these will need to be addressed and assessed on their individual merits and according to what information is available.

6 CONCLUSIONS

The production and submission of a Notice of Intent to Develop (NID) to HWC is a requirement for a development such as this, which triggers Section 38 of the NHRA. The formal HWC response to the NID application will set out what their requirements are in terms of the heritage studies they require to be conducted as part of the EIA process for the project. Based on the information set out in this screening report, it should be expected, however, that HWC will request a Heritage Impact Assessment for the St Helena Bay mixed-use development, as part of the project EIA process for the project.