

Heritage Statement

in support of Heritage Western Cape Notification of Intent to Develop (HWC NID
– Section 38(1))

(HWC Case No.: 28643EJV0521 and DEA&DP Ref. No. pre-app
16/3/3/6/7/1/D6/29/0089/26)

**Proposed Access and Structure on a portion of Portion 32 of Farm
257 Misgunst aan De Gouritz Rivier, Fransmanshoek, Mossel Bay
Municipality, Western Cape Province**

for

The Applicant: Mr C.M. Lundall, 1 Vaalkom Street, Herold's Bay, George, 6529,
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by



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13 May 2026, revised with inputs on ?? 2026

Summary - Conclusions & Recommendations

The following conclusions and recommendations are arrived at after reviewing information obtained through:

- previous heritage studies and HWC applications in the vicinity of 32/257,
- Prof John Pether's palaeontological inputs,
- SG Diagrams,
- historic and Google Earth aerial photographs, and
- a site inspection (archaeological walk-through).

"The site is located at about 100 m asl. on a vegetated dune ridge in a dune field assigned to the Strandveld Formation. The palaeontological sensitivity of the Strandveld Formation dune sands is not rated on the SAHRIS Palaeo-Map. Away from the immediate coast the fossil potential of the Strandveld Formation sands is poor overall and animal bones and marine shells included in these latest Quaternary dunes, mainly deposited during the last 12 thousand years, are expected to be in an archaeological context. Nevertheless, the fossil bones of large mammals are very occasionally found in dune-sand mines, such as elephant, hippo, rhino and antelopes, the large bones being more easily seen. These finds in young dunes are often referred to as "subfossils". Some finds are interesting in that they record the presence of fauna that has been lost in historical times" (Pether 2026, pg. 2 & 3).

"The relatively small scale of the excavated subsurface volume entailed in the proposed development renders the likelihood of intersecting the very sparsely distributed fossil bones improbable and such finds would very likely be the remains of species living today. Consequently the palaeontological sensitivity of the Strandveld Fm. sands in the vicinity of the development footprint is considered to be LOW to MARGINAL" (Pether 2026, pg. 3).

"The proposed construction of a dwelling and associated facilities on Portion 32 of Farm 257 is not anticipated to have an impact on palaeontological heritage and a Palaeontological Impact Assessment and further investigation are not required" (Pether 2026, pg. 3).

An archaeological walk-through revealed that the affected portion of the larger property for the proposed development footprint is situated on a vegetated dune of sterile aeolian sands where no heritage resources of either pre-colonial or colonial origin were seen. The northern portion of the property is impacted by informal road building and the remains of modern camp sites where modern debris is strewn about. The presence of plastic, glass, and modern beer cans suggest a very recent date for these camps. No evidence of pre-colonial shell middens or the encampments of colonial period shipwreck survivors were seen. A single Stone Age piece of questionable origin was seen in disturbed context and is rated Not Conservation Worthy.

This basic investigation has determined that no colonial or pre-colonial heritage resources of significance or value occur on 32/257. In the unlikely event that Stone Age implements are present on or in surface sediments, then they are expected to be of low local significance (Grade IIIC) and Not Conservation Worthy.

A Heritage Impact Assessment conducted by this author a few hundred meters to the SSE of 32/257 and in the same spatial, environmental and geological setting also yielded no heritage resources (Nilssen 2021). It was concluded that "Although the presence of archaeological resources in sub-surface sediments cannot be ruled out entirely, it is highly unlikely that significant archaeological resources are present in the affected area. There is no indication

that development activities will have any negative impact on the heritage and archaeological value of the area” (Nilssen 2021, pg. 3).

Because no significant heritage resources are associated with 32/257, the site does not meaningfully contribute to the cultural landscape of the area. For the same reason there will be no cumulative impact on the heritage value of the area.

The site is not visible from the access road to Fransmanshoek nor from any other public roads, scenic routes or access points. Consequently, the proposed access and structure will have no impact on the aesthetic value of the area. The proposed access and structure is in keeping with existing developments on surrounding properties / small holdings.

The project has negligible socio-economic impact, but its positive impact on the Fransmanshoek conservation area outweighs the negligible to zero negative impacts this project may have on heritage resources.

Because of the above, and because there is no reason to believe that heritage resources of value will be impacted by the proposed activity on 32/257, it is recommended that the proposed activity be approved in full, and that a Heritage Impact Assessment is not warranted for the project.

Nevertheless, it is recommended that Heritage Western Cape consider and/or require that the following be included in the Environmental Authorisation / Environmental Management Program, if the project is approved:

- due to the findings of this and previous archaeological studies, archaeological monitoring is NOT recommended, but,
- if any human remains or significant archaeological / palaeontological materials are exposed during excavations, then the find should be protected from further disturbance and work in the immediate area should be halted and Heritage Western Cape must be notified immediately. These heritage resources are protected by Section 36(3)(a) and Section 35(4) of the NHRA (Act 25 of 1999) respectively and may not be damaged or disturbed in any way without a permit from the heritage authorities. Any work in mitigation, if deemed appropriate, should be commissioned and completed before construction continues in the affected area and will be at the expense of the developer.

Table of Contents

Content	Page
Summary – Conclusions & Recommendations _____	2
1. Name, Bio-sketch and Declaration of Specialist _____	5
2. Introduction & Background _____	6
3. Site Location and Development Proposal _____	7
4. Study Area _____	11
5. Background Information, Previous Heritage Studies & Heritage Resources _____	21
6. SG Diagrams, Historic Aerial Photographs and Results of Site Inspection_ _____	31
7. Conclusions & Recommendations _____	37
8. References & Bibliography _____	39
A4 Versions of Selected Figures _____	40

1. Name, Bio-sketch and Declaration of Specialist

I, Peter Nilssen (PhD in archaeology, University of Cape Town, 2000), herewith confirm that I am a Professional member - in good standing - of the Association of Southern African Professional Archaeologists (ASAPA), including the Cultural Resource Management section of the same association since 1989 (ASAPA professional member # 097). I am an accredited Principal Investigator for archaeozoology (specialist analysis), coastal, shell midden and Stone Age archaeology; Field Director for Colonial Period archaeology; and Field Supervisor for Iron Age archaeology and Rock Art. I have worked as a professional archaeologist in Cultural Resource Management since 1989 and have completed more than 330 heritage-related impact assessments and mitigation projects as Principal Investigator.

As the appointed independent specialist (archaeologist) for this project hereby declare that I:

- act as an independent specialist in this application,
- regard the information contained in this report as it relates to my specialist input/study to be true and correct,
- do 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 and will not have no vested interest in the proposed activity proceeding,
- 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,
- am 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, and
- am aware that a false declaration is an offence in terms of regulation 48 of GN No. R. 982.



Signature of the specialist:

Date: **13 May 2026**

2. Introduction & Background

The proposed development involves an access road and structure on a small portion of Portion 32 of Farm 257 Misgunst Aan De Gouritz Rivier as described in the HWC NID application form and is not repeated here. The site is in Fransmanshoek, Vlees Baai, Mossel Bay Municipality. The environmental application, currently a Pre-Application process, is being facilitated by Inge Delpont of HilLand Environmental (hereafter HilLand) who compiled a Screening Tool Report for the project (Delpont 2026).

Although the proposed development footprint is smaller than 5000 m² and does not trigger Section 38(1)(c)(i) of the National Heritage Resources Act (Act 25 of 1999, NHRA), Heritage Western Cape (HWC) requested a Notification of Intent to Develop (NID) application due to a change in character.

“In addition, colleagues have flagged: The La Fortune (1763), a French man o’war wrecked very close by and one of its cannons is in a farmhouse nearby. It is called Fransmanshoek because of this wreck. Their survivor camp has not been found but it is somewhere in the thicket in that area (all 441 made it off and hiked to Cape Town). Although burials are not common here, it is a very big dune area and near a rocky shoreline, so midden chance is high and there is the potential for burials” (Dhansay 2026 email comms).

Through HilLand, the applicant, Mr Charles Lundall appointed this author to assist with the heritage process and application to HWC.

This document is not a Heritage Impact Assessment, but rather, is a scoping report that provides additional information in support of the NID application and motivates the recommendations made therein.

This Heritage Statement and the accompanying NID application made via SAHRIS serve to inform HWC about the proposed development activity and to make recommendations regarding the potential impact on heritage resources and the requirement for any further specialist investigations. This report, the NID application, and accompanying documentation should be read together as information is not always repeated.

The purpose of this Heritage Statement is to report the results of a basic palaeontological investigation, a site inspection and basic review of background information and previous heritage-related studies with the aim to:

- 1) assist HWC in their decision-making process to ensure that potentially significant heritage resources are investigated and not overlooked, and that unnecessary heritage studies are not undertaken, and
- 2) to assist the applicant with the heritage application process, to avoid expenses on unnecessary specialist studies, and to avoid or minimize later delays and costs resulting from the chance discovery of previously undetected and significant heritage resources.

For the above reasons, HWC recommends that NID applications should be prepared with the assistance of suitably qualified and accredited heritage professionals.

Based on information submitted here as well as its own sources and expertise, HWC will decide and advise on the way forward regarding the protection and management of heritage resources in accordance with the NHRA.

3. Site Location and Development Proposal

32/257 is located south of Vleesbaai and south of the access road (OP 4979) to Fransmanshoek, some 24 km SW of central Mossel Bay in the Western Cape Province with the centre of the proposed development footprint on the property at approximately 34°17'55.24"S 21°55'12.58"E (WGS 84, see Locality Map and Figures 1 & 2). 32/257 is bounded in the North by 33/257, in the East by 31/257, and in the South and West by a road servitude (Figure 3). A disused road runs through the northern part of the property (Figure 3).

32/257 is 8.6633 ha (86 633 m²) in extent - though the total development footprint for the proposed access road and dwelling is 950 m² - and is registered to Mr C.M. Lundall under Title Deed T13701/2024 as indicated in SG Diagram 3317/1953.



Locality Map. Location of the study area (yellow marker & red polygon in inset) SW of Mossel Bay, Western Cape Province. Courtesy of Google Earth 2026.



Figure 1. Enlarged from Locality Map showing the location of 32/257 (green polygon in centre) south of Vleeschbaai on the Fransmanshoek peninsular, Western Cape Province. Courtesy of Cape Farm Mapper.

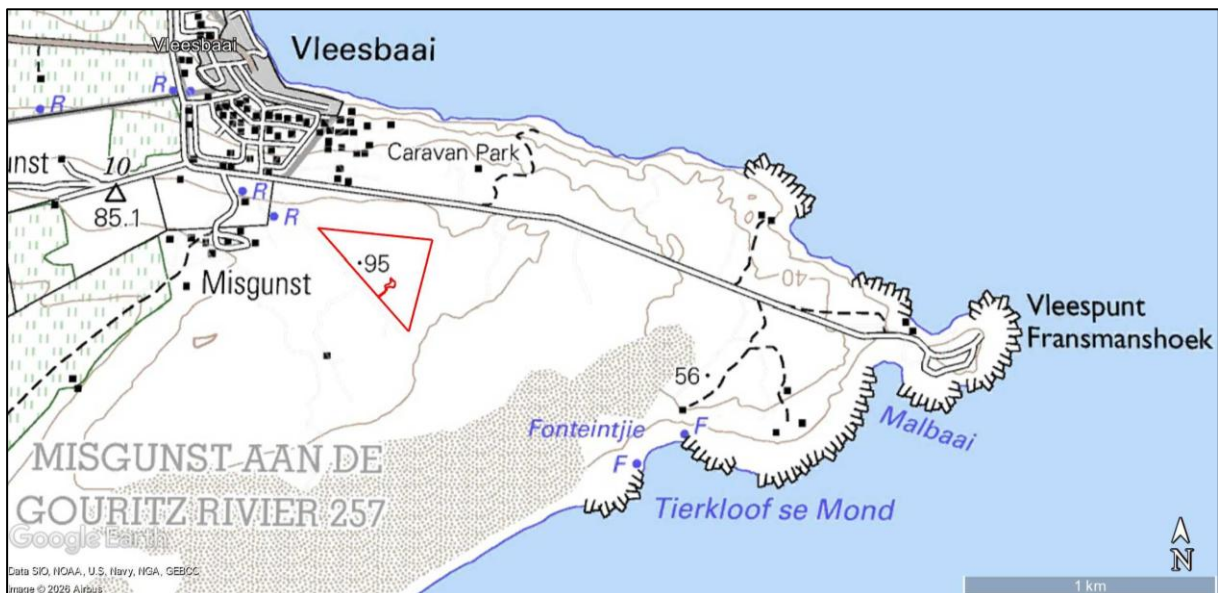


Figure 2. Enlarged portion of 1:50 000 topographic map 3421BD 1999 Gouritsmond showing 32/257 (red triangle) and proposed development footprint (red polygon within red triangle). Courtesy of the Chief Directorate Surveys and Mapping, Mowbray and Google Earth 2026.



Figure 3. Area enlarged from Figure 1 showing 32/257 (green polygon in centre) and surrounding properties and developments. Courtesy of Cape Farm Mapper. (A4 version below)

The environmental application classification selected for this project is the Transformation of Land | Indigenous Vegetation for the purpose of an access road and structure (Delpont 2026). The layout of the proposed development is shown in Figures 4 and 5. As mentioned above, a more detailed description of the proposed development is given in the accompanying HWC NID application and is not repeated here.

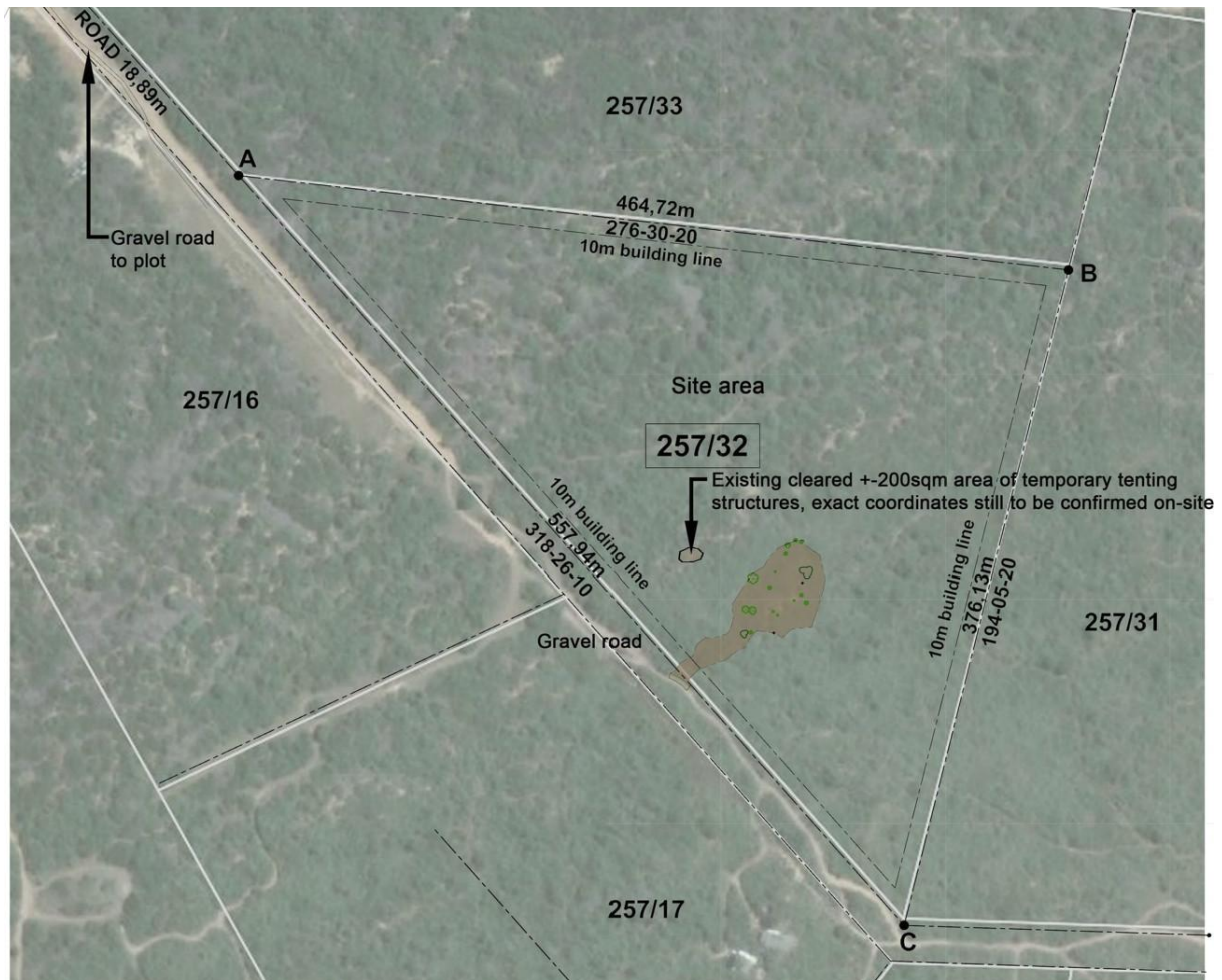


Figure 4. Proposed access and structure (shaded area) on 32/257 (A, B & C). Courtesy of the applicant. Scale: 1:2500 and North is up.

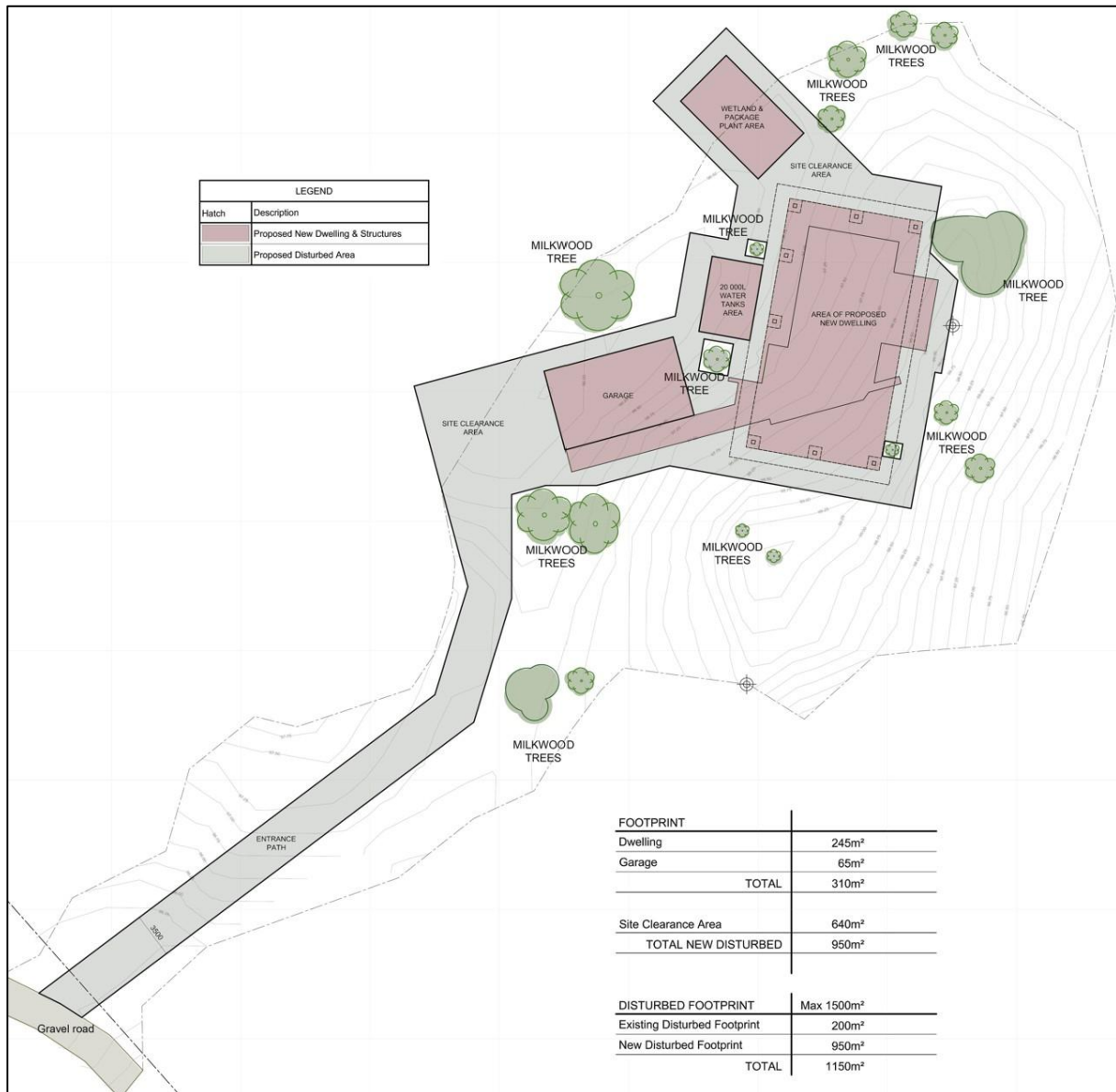


Figure 5. Proposed access and structure on 32/257. Courtesy of the applicant. Scale: 1:200 and North is up.

4. Study Area

32/257 is part of a smallholding complex on the Fransmanshoek peninsula some 24 km southwest of Mossel Bay and less than 1 km southeast of Vleesbaai in the Western Cape Province (Locality Map and Figures 1 & 2). The property is situated in a partially transformed coastal landscape consisting of undulating aeolian dune sands that are variably vegetated by a mixture of exotic and indigenous coastal species. While the southern half of the property is densely overgrown by mostly indigenous coastal thicket and shrubs, the northern half comprises exposed dunes that are partly vegetated by coastal thicket and exotic species. Areas strewn with dead exotic vegetation (mainly Rooikrans / Rooipitjie) indicate that a certain amount of alien clearing has already taken place.

The landscape contains numerous single vehicle tracks and several holiday houses or cottages are present on surrounding smallholdings (see De Kock 2020 and Nilssen 2021). To

the best of my knowledge, none of the properties in the immediate surroundings are used for agricultural purposes, for which they are zoned (“Agricultural Zone I”, De Kock 2020).

The study area is readily accessed by vehicle via a sand and imported gravel single vehicle track stemming from the main tar and gravel road between Vleesbaai and the point of the Fransmanshoek peninsula (Figures 2, 3 & 4). Zoned “Agricultural Zone I”, the smallholdings have a primary right for the construction of a primary dwelling. Apart from vehicle tracks, a disused sand/gravel vehicle track, debris from a modern disused camp site and an occupied temporary tented camp, the property is vacant.

Examples of the immediate surroundings, study area, and affected environment are shown in Figures 6 through 14. Further locational and contextual information are shown in Figure 3.



Figure 6. Top: Looking ESE along road between Vleesbaai and Fransmanshoek with access road to 32/257 indicated by white arrow. Bottom: Looking west along road between Vleesbaai and Fransmanshoek showing that 32/257 is not visible from this road.



Figure 7. Top: access road to 32/257 from the road between Vleesbaai and Fransmanshoek. Bottom: access road to 32/257 along the servitude along the western boundary of the property. Note disturbances, topography and vegetation cover



Figure 8. Top: Looking NE from sandy vehicle track toward the access point for the proposed development footprint on 32/257. Bottom: Looking roughly North over the development footprint on 32/257. Note topography, vegetation cover and exposed surfaces.



Figure 9. Examples of the receiving environment showing vegetation and exposed surfaces.



Figure 10. Example of the receiving environment showing vegetation cover, exposed surfaces and topography.

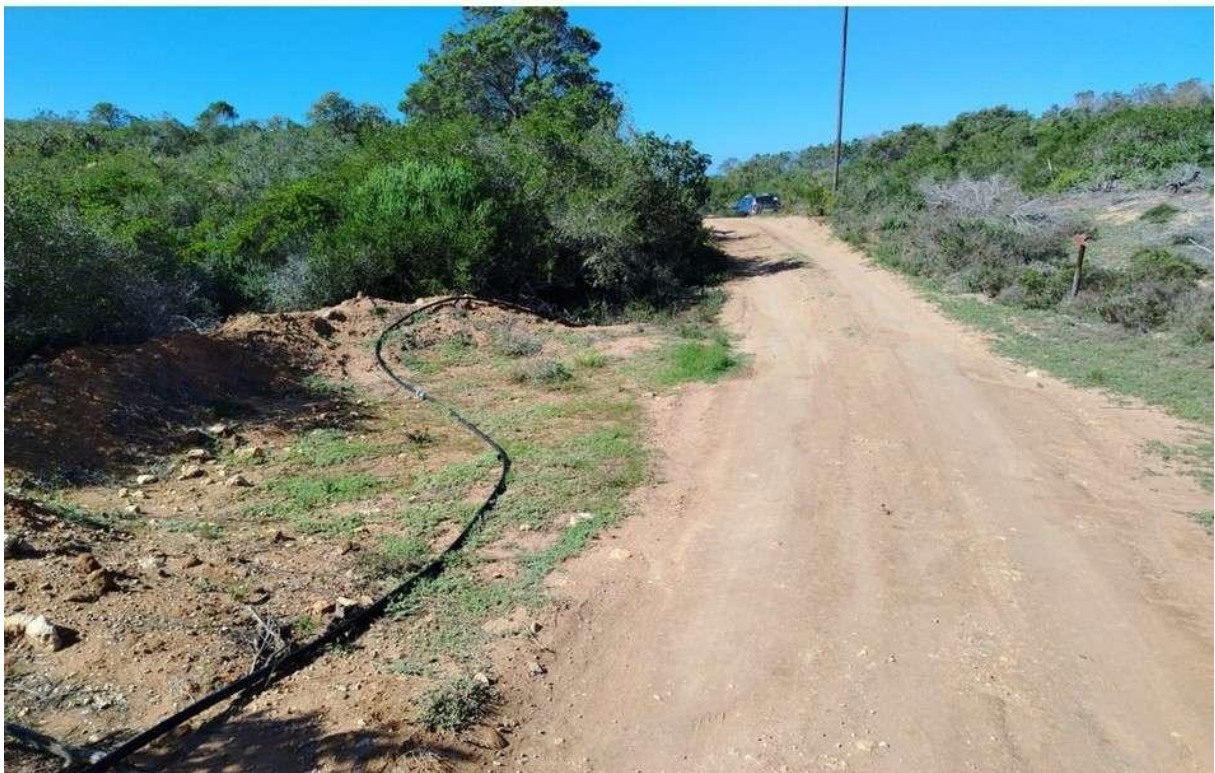


Figure 11. Examples of topography, vegetation, vehicle tracks, disturbances and imported materials in the immediate surroundings along the western boundary of 32/257.



Figure 12. Examples of exposed surfaces with naturally occurring shells of land snails.



Figure 13. Top: Example of area strewn with cut exotic Rooikrans trees. Bottom: disused vehicle track / road with imported gravels. Both localities are in the northern portion of 32/257. Note dense stands of exotic Rooikrans trees.



Figure 14. Top: overgrown and disused vehicle track / road with imported materials in the northern portion of 32/257. Bottom: vehicle track leading to temporary tented camp situated north of the proposed development footprint.

5. Background Information, Previous Heritage Studies & Heritage Resources

Palaeontology

A DFFE screening tool report was obtained by HillLand as part of the initial stages of the environmental application process (Delpont 2026). The screening tool map shown in Figure 15 indicates that the palaeontology sensitivity for most of 32/257 is MODERATE.

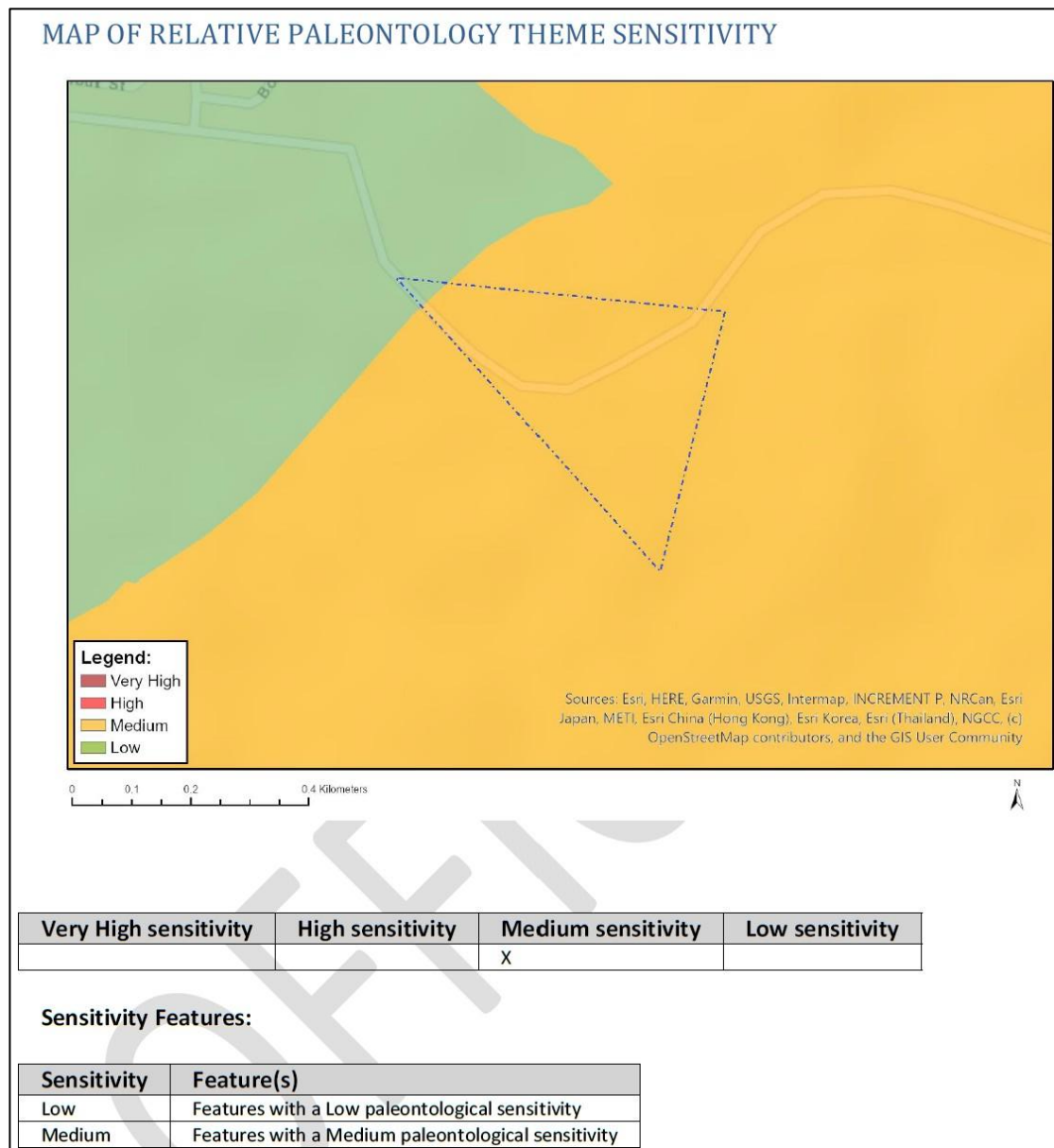


Figure 15. Map of relative palaeontology theme sensitivity from the DFFE screening tool report (Delpont 2026). 32/257 is represented by the dashed blue line.

The SAHRIS PalaeoSensitivity map shows that the bulk of the property is clear / unshaded, meaning that sensitivity is unclassified and that a minimum of a desktop Palaeontological study is required (Figure 16). Consequently, Prof John Pether was commissioned for professional input (Pether 2026).

The following palaeontological inputs were obtained and are copied in full and verbatim from Prof John Pether's brief palaeontological impact statement, but figure numbers are altered to follow the sequence of this report (Pether 2026). Prof Pether's complete report is included with this submission and reads as follows:

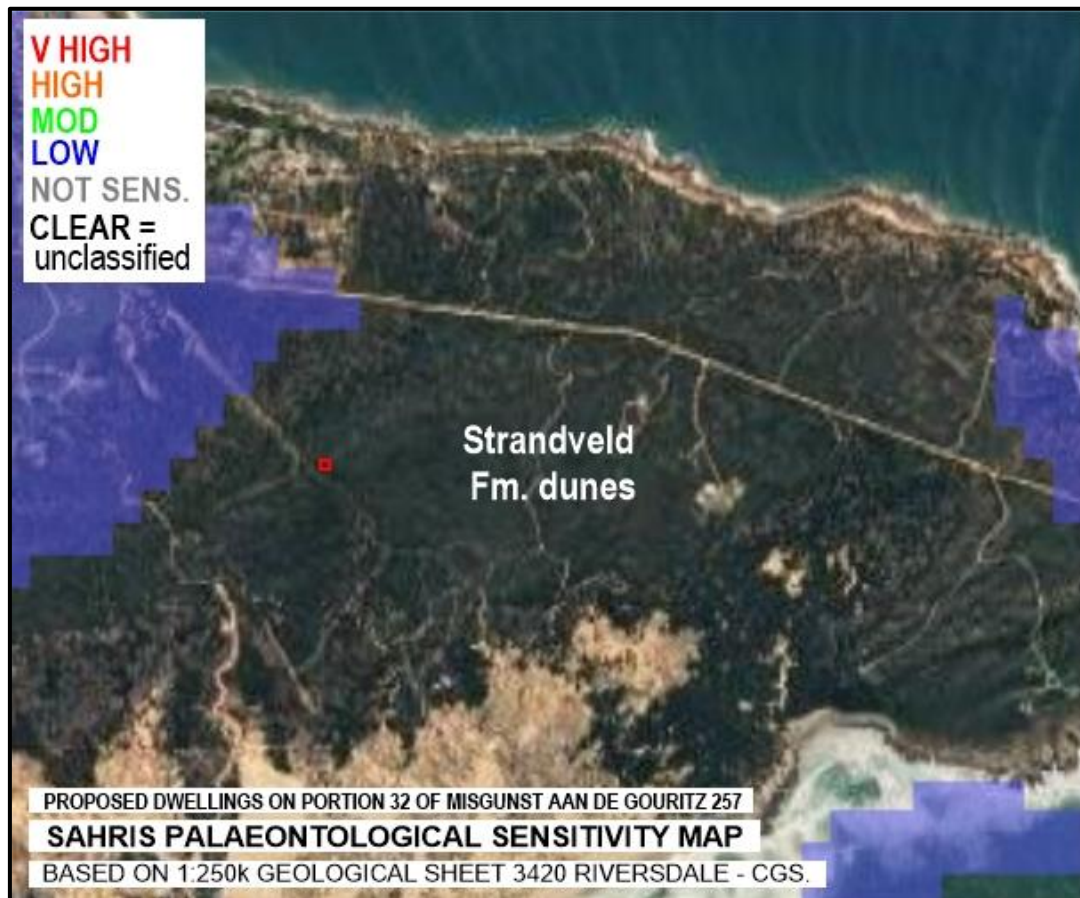


Figure 16. SAHRIS PalaeoSensitivity Map shows that 33/257 (red polygon) is clear / unshaded (Pether 2026, Figure 3).

Geological Context

The site is located at about 100 m asl. on a vegetated dune ridge in a dune field assigned to the Strandveld Formation (Figure 17). The palaeontological sensitivity of the Strandveld Formation dune sands is not rated on the SAHRIS Palaeo-Map (Figure 16). Away from the immediate coast the fossil potential of the Strandveld Formation sands is poor overall and animal bones and marine shells included in these latest Quaternary dunes, mainly deposited during the last 12 thousand years, are expected to be in an archaeological context. Nevertheless, the fossil bones of large mammals are very occasionally found in dune-sand mines, such as elephant, hippo, rhino and antelopes, the large bones being more easily seen. These finds in young dunes are often referred to as "subfossils". Some finds are interesting in that they record the presence of fauna that has been lost in historical times.

Anticipated Impacts

The relatively small scale of the excavated subsurface volume entailed in the proposed development renders the likelihood of intersecting the very sparsely distributed fossil bones improbable and such finds would very likely be the remains of species living today. Consequently the palaeontological sensitivity of the Strandveld Fm. sands in the vicinity of the development footprint is considered to be LOW to MARGINAL.

The proposed construction of a dwelling and associated facilities on Portion 32 of Farm 257 is not anticipated to have an impact on palaeontological heritage and a Palaeontological Impact Assessment and further investigation are not required.

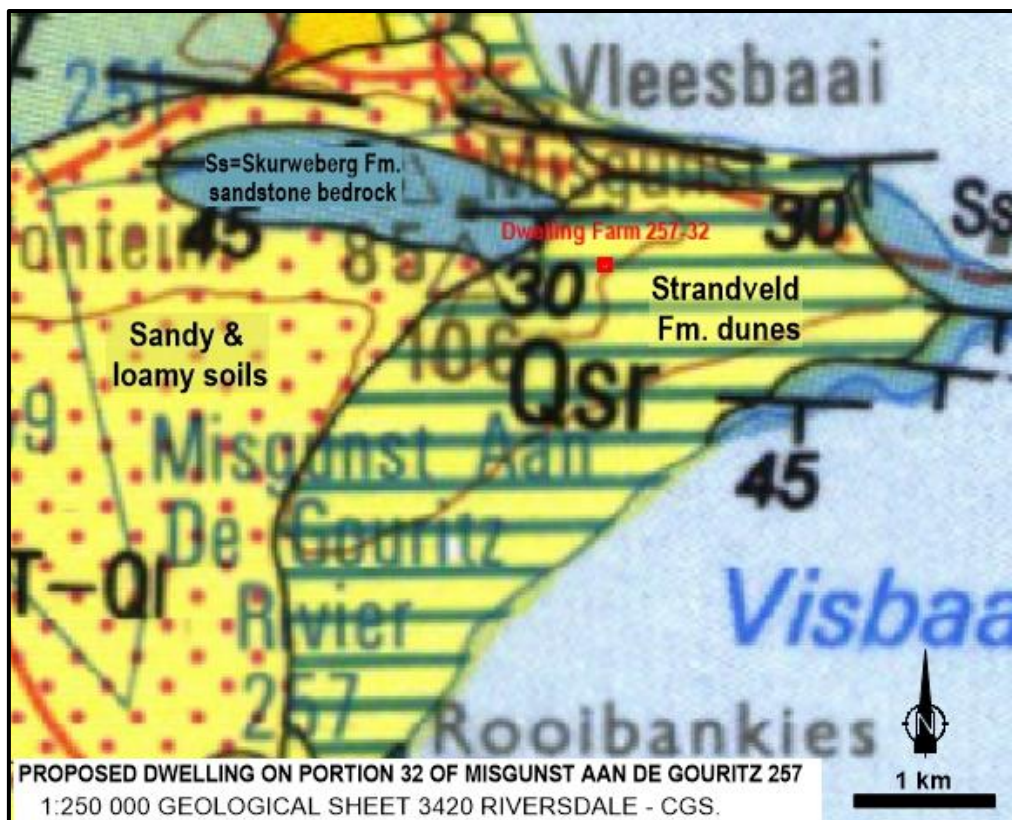


Figure 17. Geological context of the proposed dwelling. (Pether 2026, Figure 2).

Archaeology

The DFFE screening tool map and table for the archaeological and cultural heritage theme sensitivity shown in Figure 18 indicates that the proposed development footprint falls within an area of low sensitivity (Delport 2026). The findings of the basic investigation conducted here as well as a HIA done for 19/257 (Nilssen 2021) concurs with the DFFE screening tool report's attribution of LOW sensitivity with respect to archaeological and cultural heritage resources on 32/257.

While a detailed desktop study is beyond the scope of a NID application, an existing desktop study and literature review done for a project in the immediate surroundings is pasted below for interest and to provide broader context regarding heritage resources (Nilssen 2021, Pg. 32 to 36). It is noted that the latter study identified no heritage resources on 19/257.

"This author has considerable experience with the archaeology of the coastal regions of the Western and Eastern Cape provinces. In general, the coastal strip is rich in archaeological remains due to predictable and reliable food sources in the intertidal zone as well as an abundance of fresh water sources such as rivers, streams, seeps and springs. Archaeological sites occur either in the open or in caves, rock shelters and overhangs. The latter contexts provide the best opportunities for the accumulation and preservation of remains, while open sites are generally more dispersed and prone to disturbance, erosion and poor preservation of organic remains" (Nilssen 2021 pg. 32).

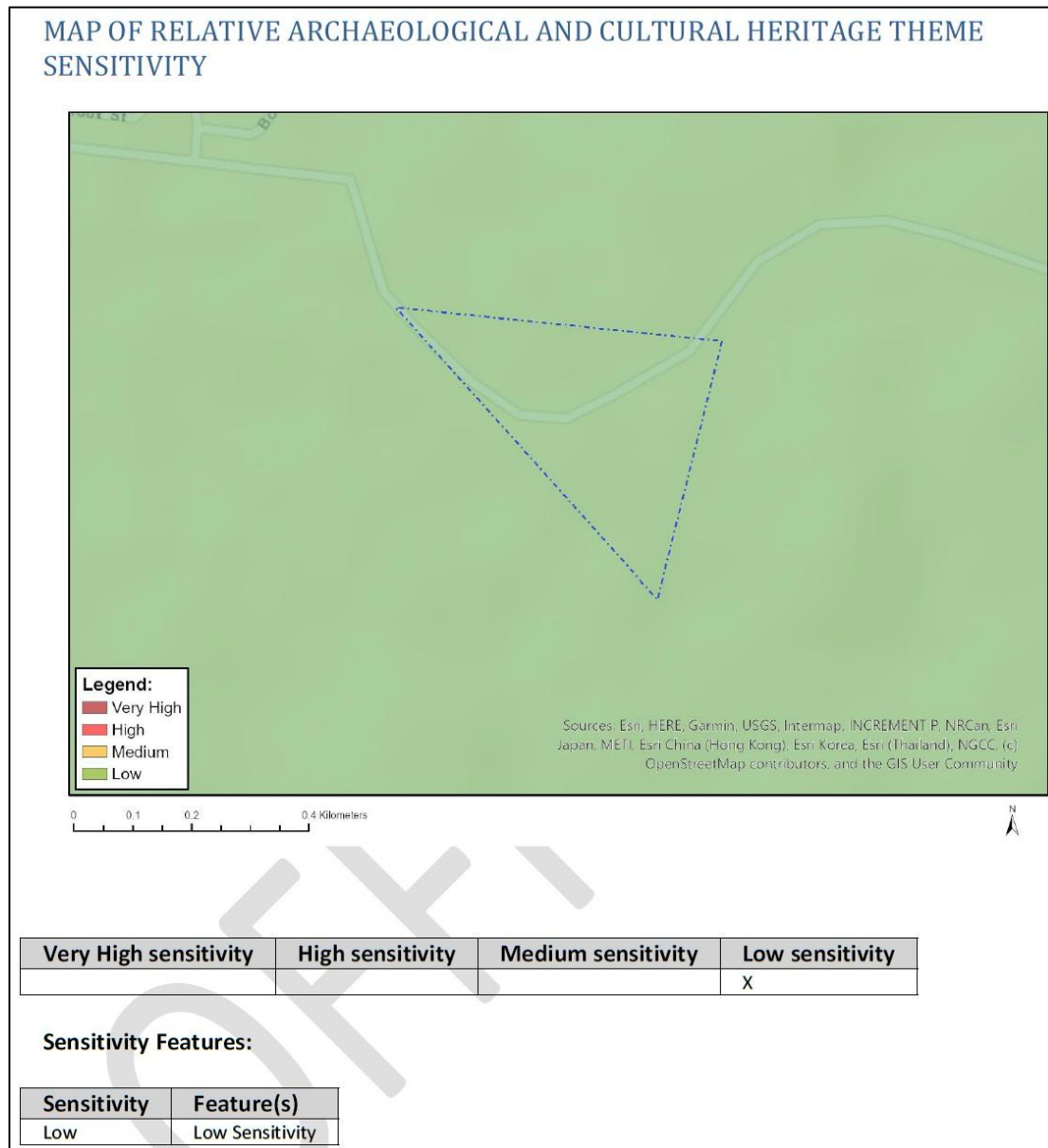


Figure 18. Map of relative archaeological and cultural heritage theme sensitivity from the DFFE screening tool report (Delpont 2026). 32/257 is represented by the dashed blue line.

“In descending age, the archaeological record in the area includes:

- Early Stone Age (ESA) stone implements such as hammer stones, cores, flakes and core tools (hand axes, cleavers, etc), but at this time no ESA sites with associated organic remains are known to occur in this area,
- Middle Stone Age (MSA) sites with stone artefacts, cultural and food remains are found in caves, such as those in the Provincial Heritage Site of the Pinnacle Point Site Complex west of Mossel Bay, but when they occur in the open, they are normally lacking in organic remains,
- Later Stone Age (LSA) sites with artefacts, cultural and food remains are also present in some of the fore-mentioned caves as well as open sites such as shell middens normally associated with rocky intertidal zones,

- pastoralist or herder (pottery period) sites may occur in caves or in the open and pottery and the remains of sheep are also commonly found in shell middens; and
- colonial period sites include shipwrecks, farmsteads, structures, transport infrastructure, middens, burials and cemeteries among others.

Prehistoric human burials, usually of LSA or more recent age, may occur anywhere in the landscape where soft sediments are present, and are sometimes at or near sites of human occupation both in the open and in caves or rock shelters.

The approximate dates for these phases of hominin and human occupation of the coastal and near coastal zone of the Western and Eastern Cape provinces is as follows:

- ESA = from about 2 million years ago till about 300 000 years ago,
- MSA = 300 000 years ago till between about 40 000 and 20 000 years ago,
- LSA = from between about 40 000 and 20 000 years ago till about 2000 years ago,
- pastoralist or herder = 2000 years ago till present or arrival of colonists, and colonial period = from late 15th Century (1488 landfall of the seafarer Bartolomeu Dias at Mossel Bay) till present” (Nilssen 2021 Pg. 32 & 33).

“Of the several projects indicated in the surroundings of the study area on the SAHRIS Cases and Reports Map, only three reports were available for download (Figure 19). Three of the linear projects indicated on the SAHRIS map do not include archaeological or heritage specialist studies or reports on the SAHRIS website” Nilssen 2021 pg. 33).



Figure 19. Annotated SAHRIS Cases and Reports Map for the surroundings of the study area indicated with the black ellipse with added study labelled 19/257 (Nilssen 2021) with 32/257 indicated directly above (<https://www.sahris.org.za/ReportsMap>)

“The earliest available study was conducted near the mouth of the Gouritz River on a property that includes the eastern bank of the river and situated approximately 5,5 km SW of the current study area (Halkett and Hart 1996). Apart from a near continuous low density background scatter of ESA and MSA stone artefacts, five sites were recorded and mapped.

One site is described as a scatter of stone implements representative of all three Stone Age periods (ESA, MSA and LSA) that includes a lot of cores and waste pieces that are scattered over a wide area. The dominant raw material is quartzite, but pieces in finer grained silcrete were also recorded. The site is disturbed by erosion and ploughing and rated to be of low significance.

Two sites occur in close proximity to two separate small natural pans where a mixture of ESA and MSA stone implements are in a disturbed state as a result of ploughing. One of the sites includes some stone implements of LSA origin as well as marine shell, and it is suggested that the shell is more likely of LSA age. No bone is preserved at either site and the dominant raw material for stone tools is quartzite. A few artefacts in finer raw material were noted. Both sites are considered to be of low significance.

A fourth site is a single lens of in situ shell midden exposed in the profile of an erosion gully that truncates a vegetated dune. The site is thought to be of LSA origin and contains some cores and flakes. No formal tools or pottery were seen here or at any of the other sites. Due to the contextual integrity, the site is considered to be of medium significance and it is recommended that it should be protected and conserved.

A small rock shelter obscured by dense vegetation was identified, but no archaeological remains were seen. It is thought that the shelter may contain archaeological remains in buried deposits. The shelter is rated to be of medium significance and it is recommended that it remains hidden and protected behind vegetation.

Another archaeological investigation available from the SAHRIS website involves two coastal properties situated 8 km and 13 km NNW of the current study area between Vleesbaai and Danabaai (Figure 19). Only one of these properties, MAPID 00116, is indicated in Figure 19. The second coastal property is located further to the east, but west of Danabaai, roughly at the eastern extent of the black ellipse in Figure 19. A property located between the two referred to above has undergone authorised residential development without an archaeological or heritage investigation (Kaplan 2004). This latter, “sandwiched” property is discussed in more detail further below.

Notable numbers of ESA and MSA stone implements were seen in old agricultural lands, roads, ditches, and on eroded slopes further inland.

Twenty two (22) archaeological sites were documented on the two large coastal properties referred to above and it is anticipated that several more sites are either obscured by vegetation or buried in aeolian dune sands (Kaplan 2004). Nineteen (19) sites were identified among the primary dunes in the shoreline area. For the most part, these sites comprise extensive scatters of mainly LSA tools, but also mixed with MSA pieces as well as shellfish, and in some cases include fragments of ostrich egg shell (OES) and pottery. Most of the middens are dominated by white mussel (*Donax serra*), but in some cases brown mussel (*Perna perna*) is also present. Several sites include a mix of LSA and MSA stone implements and the materials are often deflated (and mixed) onto old compacted red sands or palaeosols, while some sites are situated atop exposed calcrete surfaces. Stone artefacts are mainly in quartzite, but pieces in silcrete are also present. Stone artefact types include large and smaller flakes, chunks, blades,

cores, split and/or flaked cobbles, manuports and hammer stones. Formal or retouched tools are rare.

Unusual sites include: a white mussel midden with LSA stone implements, pottery, modern glass and plastic, as well as evidence for modern “braais”; and one site has several thousand pieces of OES as well as a thin scatter of stone artefacts in fine-grained quartzite and silcrete.

In addition to an isolated historic period burial, a small family cemetery occurs near a ruined homestead and outbuildings. Many of the historic farmsteads and outbuildings (older than 60 years) and cemetery are protected under the NHRA. One of the homesteads is of Late Victorian style and in good condition. Any renovation or work on this structure will require a permit from HWC.

It is noted that archaeological sites are likely to be impacted indirectly by increased human activity and pedestrian traffic. Some of the sites are rated as highly significant and warrant sampling. Recommended actions for mitigating impacts include detailed surveying, mapping, and collection of archaeological remains. Monitoring of bulk earthworks for infrastructure and excavations by a professional archaeologist is also recommended.

Kaplan suggests that an archaeological investigation should be done for the “sandwiched” property referred to above as numerous sites are located there. These include well preserved, highly visible and fragile shell middens with bone, pottery, ash and charcoal, ostrich egg shell and stone tools. These sites occur in the large wind deflated dunes and on the steep primary dunes adjacent to the shoreline. Scatters of stone tools, shellfish remains and terrestrial mammal bones also occur on wide sandy slopes both east and west of the main parking area at the beach (Kaplan 2004). Kaplan makes reference to the late Professor Hilary Deacon’s (1989) study for the Moss gas pipeline, which includes the abovementioned “sandwiched” property, where Deacon recorded shell middens and other finds. Deacon (1989:1; from Kaplan 2004) describes a well-preserved shell midden close to the parking area, with stone tools, surface bone, pottery, ostrich egg shell and ground ochre. Deacon recommended systematic archaeological excavation of the parking area shell midden, but according to Kaplan this was never done.

The third study obtained from the SAHRIS website is that of the Gourikwa (formerly Rein’s) Nature Reserve located about 16 km WSW of the current study area along mostly rocky shoreline (Figure 19, Kaplan 1995). The property is rich in archaeological sites that are dominated by an extensive series of well preserved open air shell middens along the frontal dune system that cover nearly the entire length of the 7.5 km long coastal strip. A number of stone walled tidal fish traps (visvywers) were observed and are readily visible on Google Earth aerial imagery at the time of this writing. Further inland, an assemblage of much earlier stone implements of ESA and MSA origin were found in a disturbed deflation basin and on the exposed lower ridges of Buffelskop overlooking Gourikwa.

Shell middens are variable and may include stone artefacts, fauna, pottery, ochre and OES. Stone implements in quartzite are dominant, but pieces in silcrete also occur. Limpets are dominant with notably lower numbers of periwinkle and abalone, but mussels are conspicuously absent. Sites are disturbed by extensive and intense mole activity. Formal tools in silcrete include adzes and scrapers while some quartzite flakes are also modified. Grind stones and hammer stones are fairly common. One midden with a high concentration of quartzite pieces appears to be a knapping station or stone artefact production workshop. Some of the middens are disturbed by roads and structures.

A stone artefact scatter is located in a deflated area about 500 m inland behind the lighthouse and includes stone implements of MSA and ESA origin. Artefact types, all in quartzite, include unmodified flakes (some with prepared or faceted platforms), cleavers, hand axes, hammer stones, and one possible grind stone. This site is disturbed by mole activity and human activities associated with erosion control.

A second stone artefact scatter is located among quartzitic rocks on the mountain ridge overlooking Gourikwa and includes ESA flakes and an irregular core.

Several historic period ruins occur on the property, but most are Not Conservation Worthy (NCW). Kaplan proposes that two ruins should be conserved and need to be restored under a permit from the heritage authorities (Kaplan 1995).

Kaplan cautions against potential negative impacts to sub-surface archaeology and prehistoric burials, recommends that an archaeological component should be included in the planned education centre, and that some shell middens could be incorporated into the tourism initiatives and hiking trail planned for the nature reserve (Kaplan 1995).

It is noted from the above studies that when archaeological remains are found in exposed, open contexts, they are often temporally mixed and disturbed, lacking in organic remains, and occur on older land surfaces (palaeosols). The lack of *in situ* context, therefore, renders these archaeological sites compromised and of questionable scientific value. With a few exceptions, shell middens are usually fairly close to the shoreline and mostly associated with rocky intertidal zones. In other words, shellfish are most commonly processed and consumed close to the point of collection" (Nilssen 2021 pg. 33 to 36).

The current study area, as is the case for 19/257 (Nilssen 2021), does not fall into the type of location normally expected to contain shell midden deposits, and therefore, the finding of the field survey was not surprising.

Archival Research and the Colonial Period

Results from archival research conducted for nearby projects and for the NID and HIA associated with 19/257 provides further contextual information relating to the colonial period (De Kock 2020 and Nilssen 2021). The below, with edits and new figures is copied from pages 5 through 9 of the De Kock 2020 report.

"Colonial farmers settled in the Gouritz region from as early as the 1730's. Un-surveyed loan farms in this region were granted to colonists by the Dutch East India Company (DEIC) for the purpose of providing meat, butter and wheat to Cape Town. In 1743 the DEIC established a magisterial seat in Swellendam to govern and control the activities of the frontier settlers. Quitrent rentals were paid annually to the Government over a period of twenty years, after which the property was deemed paid for. The quitrent system of 'loaning to own' replaced the previous DEIC loan farm agreements, which were renewed every five years (Schulz, 2010).

From a colonial perspective the subject property forms part of the early farm Misgunst aan de Gouritz Rivier first surveyed in 1814 by surveyor Sgt. Petersen (Petersen also compiled early layout for the town of George). A note on the 1814 diagram describes land use at the time as "weyland" (grazing purposes, Figure 20). A later (1863) redrawn diagram shows the farm divided into 9 lots, the subject property forming part of land then known "Lot B" (Figure 21).

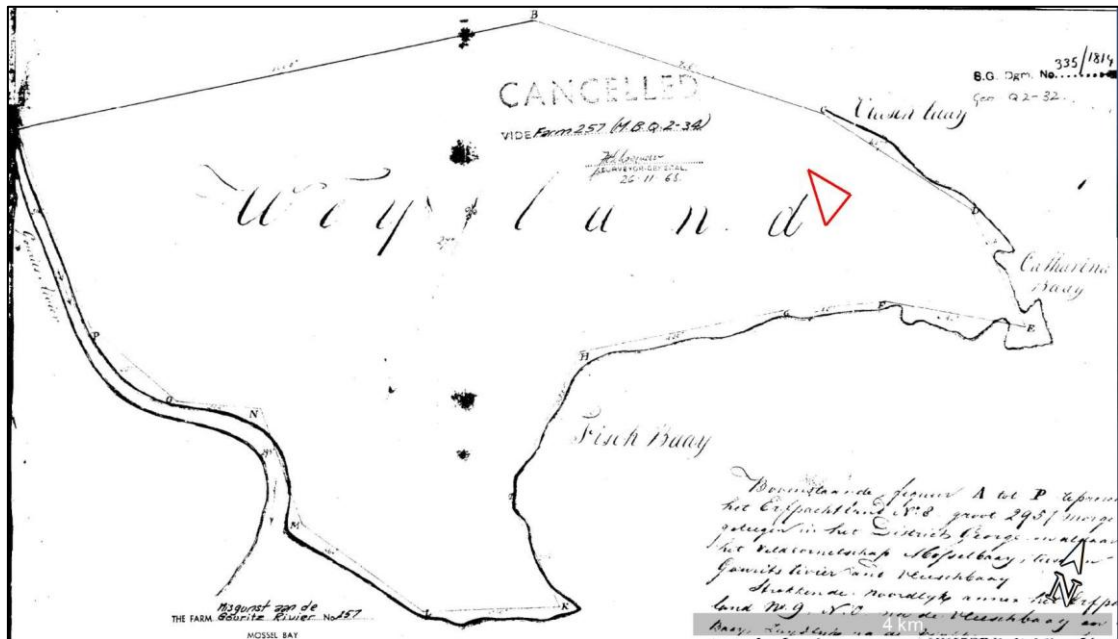


Figure 20. Cropped portion of SG Diagram 335/1814 showing location of 32/257 (red triangle) relative to the original boundaries of Farm 257 (Misgunst aan de Gouritz Rivier). Courtesy of Cape Farm Mapper and Google Earth 2026.

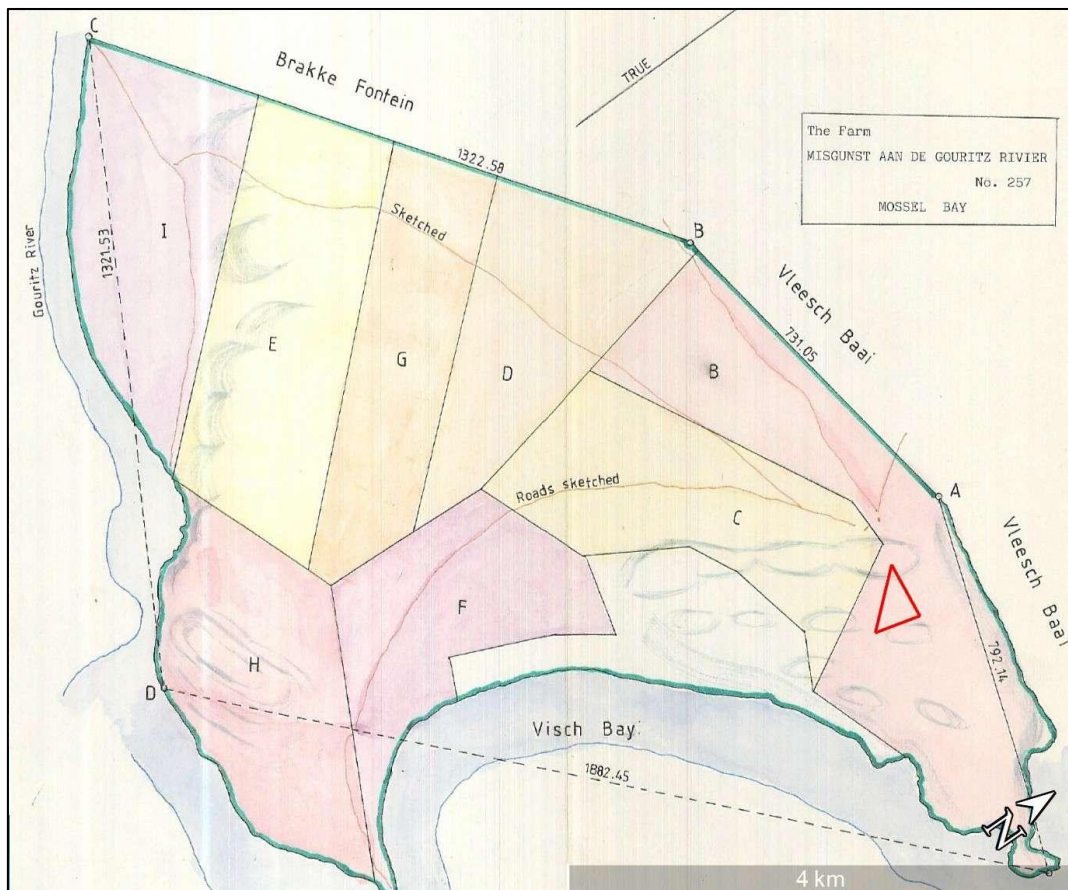


Figure 21. Cropped portion of SG Diagram 308/1863 with location of 32/257 (red triangle) in relation to "Lot B" as recorded in a redrawn version of the 1836 diagram for the farm Misgunst aan de Gouritz Rivier 257. Courtesy of Cape Farm Mapper and Google Earth 2026.

Later 1880-1890 SG mapping for the area shows the extent of the farm together with access routes and important structures (Figure 22). “Lot B” of the farm was subdivided in 1952 to create the smallholding complex as it exists in present day (Figure 23).

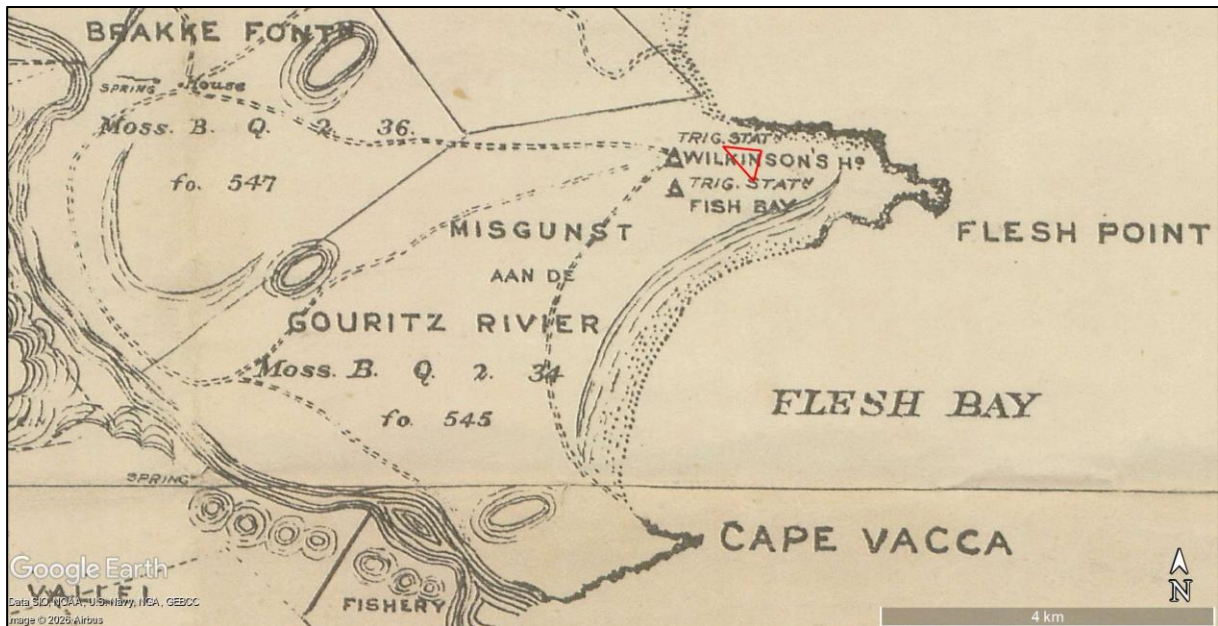


Figure 22. Cropped portion of SG mapping 1880-1890 with location of 32/257 (red triangle) in relation to early farm Misgunst aan de Gouritz Rivier (NGSI). Courtesy of Google Earth 2026.

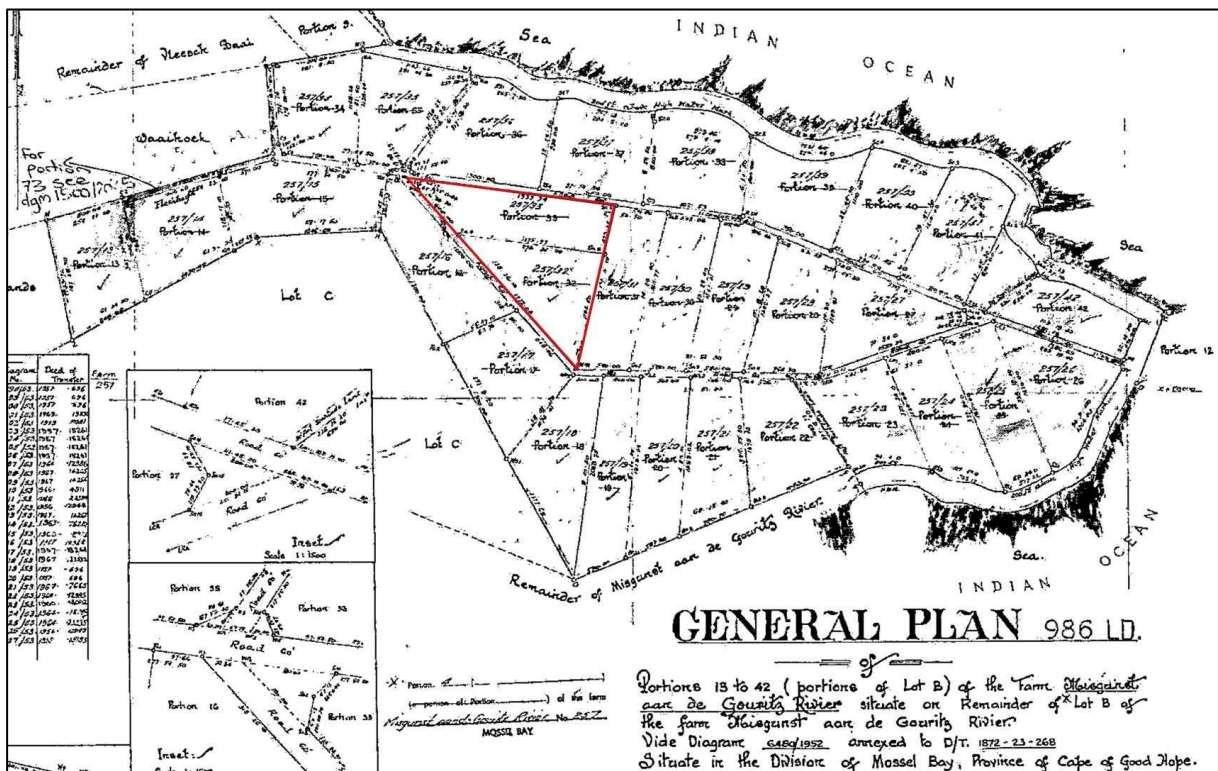


Figure 23. Cropped portion of General Plan 986 LD 6481/52 with location of 32/257 (red triangle) relative to the small holding complex, formerly “Lot B” of the early farm Misgunst aan de Gouritz Rivier. Courtesy of Cape Farm Mapper.

The Janse van Rensburg first immigrant settler (stam vader) arrived in the Cape before 1708, the recorded year that he married Alletta van der Merwe, widow of Marthinus van Staden. Members of the Janse van Rensburg family acquired ownership of the following farms when the system of purchase by means of Quitrent was made available by the British Governors of the Cape of Good Hope from 1813 onwards:

- Brakkefontein, situated directly north of the farm Fleesch Baai, granted in 1814 to Hendrik Christoffel Janse van Rensburg.
- Misgunt aan de Gouritz granted in 1818 to Hendrik Christoffel Janse van Rensburg.
- Vleesch Baai granted in 1816 to Nicolaas Janse van Rensburg.

Several (DEIC) household inventories for early inhabitants of the area confirm that the farm Misgunt aan de Gouritz Rivier was used for cultivation and keeping livestock. For example, a household inventory dated 3rd July 1786 for Maria Magdalena Botha (wife of “Johannes Janse van Rensburg”) records, inter alia, 151 cattle, 33 “trek ossen”, 120 sheep and 7 horses. Significantly, the inventory also records 3 slaves:

- 1 young male named “Leij van Ceylon”;
- 1 young male named “November van Mosambique”;
- 1 young woman named “Sylvia van Mosambique” with a two month old child named “Padra van de Caab”.

Historically, three shipwrecks are known to have taken place in Fleesch Bay. The exact position of the wrecks has not been established. The ship names are listed below:

- Le Fortune 1763
- D’ Elefant 1750
- Thomas Nickenson 1871” (De Kock 2020 pg. 5 through 9).

According to communications from HWC, “The La Fortune (1763), a French man o’war wrecked very close by and one of its cannons is in a farmhouse nearby. It is called Fransmanshoek because of this wreck. Their survivor camp has not been found but it is somewhere in the thicket in that area (all 441 made it off and hiked to Cape Town)” (Dhansay 2026 – email dated 25 March 2026). No archaeological evidence associated with the documented shipwrecks in the area were identified on 19/257 (Nilssen 2021).

A deed search was not undertaken for the NID application presented here and a basic historical background research for 19/257 did not identify significant heritage-related aspects or themes that may be impacted by the proposed development (De Kock 2020 & Nilssen 2021).

6. SG Diagrams, Historic Aerial Photographs and Results of Site Inspection

All available SG Diagrams and historic Google Earth (GE) imagery were carefully examined for indications and traces of heritage resources such as built structures, roads, features and evidence for human-related impacts. None were seen on 32/257 in any of the SG Diagrams or GE imagery.

Although requested in March 2026 and again in April 2026, no high resolution digital copies of historic aerial photographs were received from the Department of Agriculture, Land Reform and Rural Development by the time of this writing.

Analysis of early aerial imagery contributes to building an understanding of the evolution of landscapes through identification of traditional (i.e. pre-Modern) landscape patterns as read

within the context of present landscape character and land use. Landscape patterns evident from the earlier aerial photography of the study area are described as follows:

- Earliest available (1942) aerial imagery shows the Fransmanshoek peninsula undeveloped (save for a few cottages close to the easternmost point) whilst the hinterland, further west, was already transformed by agricultural activities. The pattern of indigenous vegetation/ dune field visible within the context of the cadastral boundaries of 32/257 appears very similar to that in present day. No structures are visible on the property or its direct environs though two faintly visible tracks are evident (Figure 24).

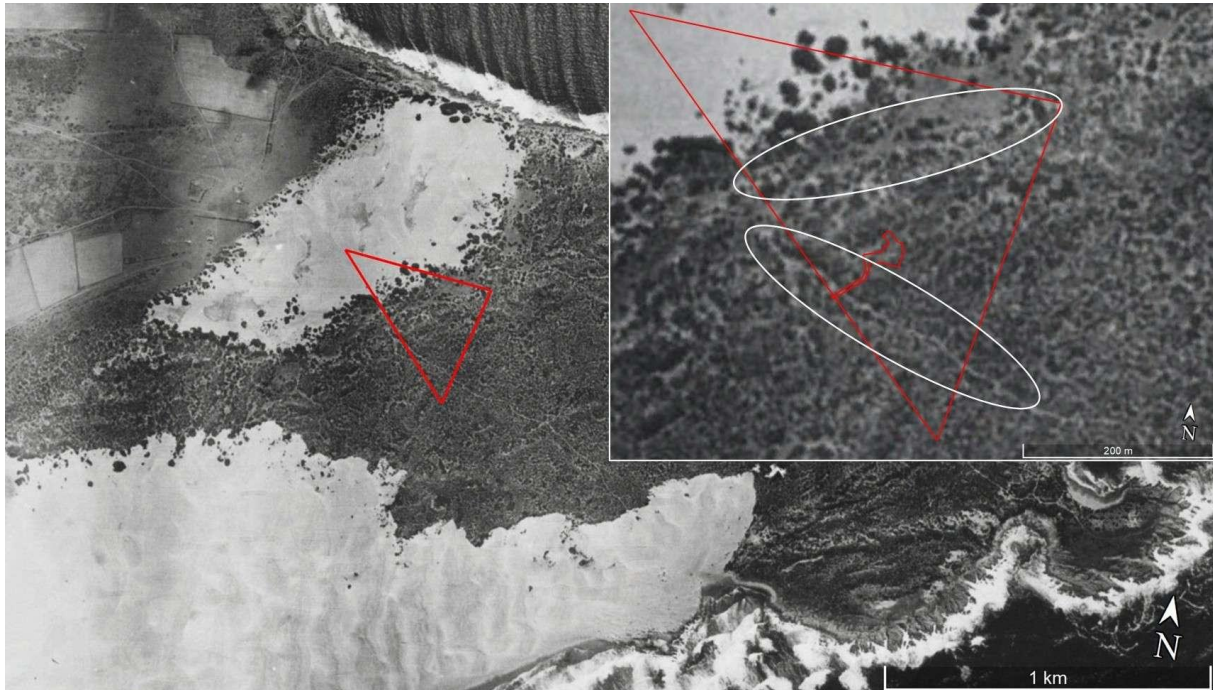


Figure 24. Location of 32/257 (red triangle) superimposed with Google Earth on 1942 aerial imagery for the area (Aerial survey 171, Flight Strip 14, Image 6035, NGSI). Note dune fields, agricultural activities in top left quadrant of image and faintly visible tracks running through the property (white ellipses in inset). (A4 version below)

Based on the above, it is not anticipated that any significant heritage resources (palaeontological or archaeological) will occur on 32/257 or the smaller proposed development footprint as indicated above in Figures 2 through 5. Furthermore, the proposed access road and structure is in keeping with existing and pending developments in the surrounding environment and small holding complex.

After being given access and shown around by Mr Lundall, an independent site inspection of the development footprint and larger property was conducted on 16 April 2026 by means of a foot survey (archaeological walk-through) that covered representative areas of the property. Notwithstanding dense vegetation cover, sufficient areas were accessed where ground surfaces are exposed for archaeological inspection (Figures 6 through 14). Adequate observations were made for the purpose of this NID application.

Survey tracks and observations were fixed with a handheld Garmin Etrex 32x GPS to record the investigated area and observations (Figure 25). A high quality, comprehensive digital photographic record was made with a Honor X7d mobile phone, including location data for photographs and observations. All GPS and photographic data are available on request.

The property was examined with a focus on the potential impact of the proposed development on heritage related resources of both colonial and pre-colonial origin. Heritage resources listed in Section E of the HWC NID application form were considered but are not listed here unless they are present on or in the immediate vicinity of the development footprint, or if they are anticipated to occur on or in the immediate vicinity of the property.

Due to previous heritage-related studies in the immediate surroundings and results of this investigation and site inspection, adequate observations and information are available for input to the HWC NID application process.

The approach to field work was:

- to evaluate the visual / aesthetic sensitivity of the study area from the road between Vleesbaai and Fransmanshoek, the site is not visible from a tourist or “scenic route” and
- to inspect the site to gain an understanding of its archaeological content and context by accessing a representative portion of the affected area.

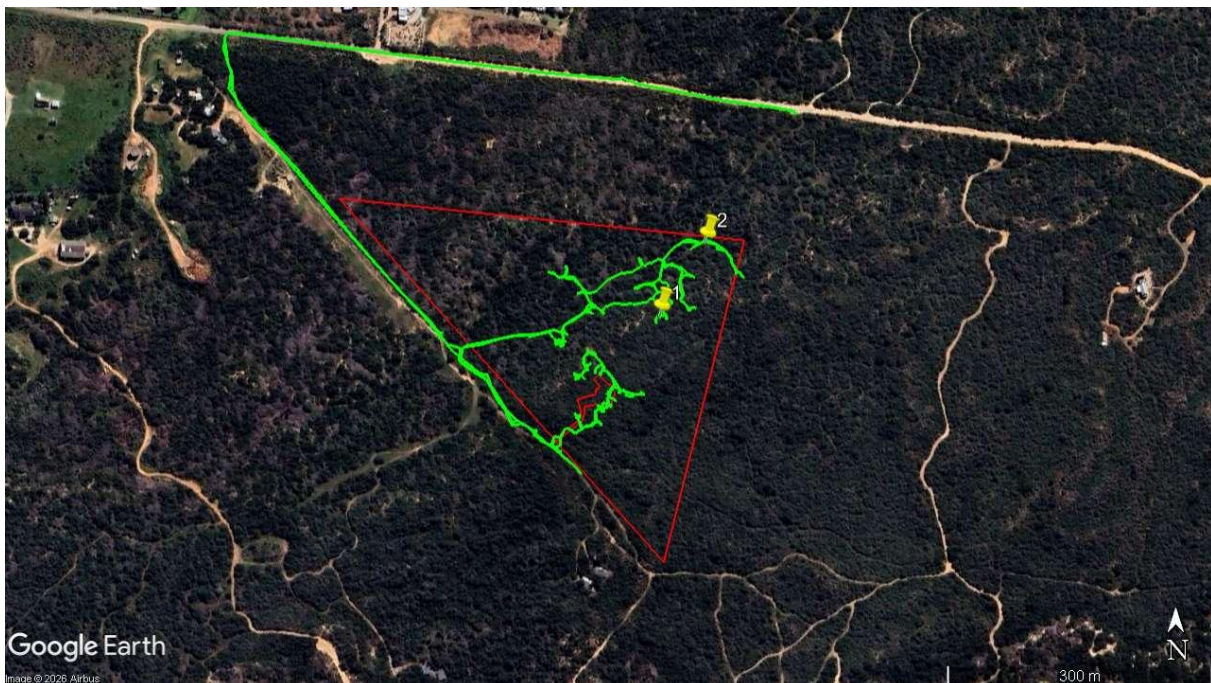


Figure 25: 32/257 (red triangle) and proposed development footprint (red polygon within triangle) with GPS-fixed survey tracks (green lines) and observations (labelled yellow markers). (A4 version below)

A single flaked piece of quartzite of indeterminate Stone Age origin was recorded at waypoint 1 (Figure 25), close to an old disused vehicle track with imported gravels (Figure 26). Being isolated and not associated with any other organic or cultural materials, the piece seems out of place and appears relatively fresh by the lack of patination. The latter, however, would not be unusual for Middle or Later Stone Age stone artefacts. Nevertheless, given the imported gravels associated with the nearby disused vehicle track, it is possible that this piece was brought onto the property in recent times.

It follows that the piece recorded at waypoint 1 is of questionable archaeological origin and may originate from outside 32/257. Due to its compromised context (possible association with imported gravels), its isolated nature, and the absence of associated organic or other cultural

remains, the find is considered to be of low local value, Grade IIIC, and Not Conservation Worthy.



Figure 26: Top: Context of identified Sone Age piece adjacent to disused vehicle track. Bottom: Flaked piece of quartzite with cobble cortex shown in left image. Average male hand for scale.

Also adjacent to the disused vehicle track in the NE portion of 32/257, debris from a relatively modern camp site was identified at waypoint 2 (Figures 25, 27 & 28). The scatter of debris includes marine oyster and ollycrook shell, fragments of glass, ceramic, and plastic as well as pieces of soft metal from modern beer cans (Figure 28). Given the recent/modern nature of materials, the scatter is not considered to be of archaeological value and certainly does not represent remains that could be associated with the above-mentioned colonial period shipwrecks.



Figure 27: Top: Context of identified scatter of modern debris at waypoint 1 along the disused vehicle track/road. Bottom: Scatter of debris including plastic, glass, ceramics, metal and marine shell (mostly oyster with some ollycrock). Hand-held GPS unit for scale.



Figure 28: Examples of materials seen in debris scatter along disused vehicle track/road including plastic, glass, beer can, ceramic and marine shell. Average male index finger for scale.

No further archaeological or heritage resources of colonial or pre-colonial origin were identified.

The property is not visible from any public road. Nevertheless, on heritage grounds, due to the partially transformed nature of the surroundings and the absence of significant heritage

resources or themes, the proposed development will have no impact on the visual or aesthetic value of the area. Furthermore, the formerly pre-colonial / rural landscape is already transformed by existing and approved residential and infrastructural developments in the surroundings. Consequently, the proposed development is in keeping with existing and pending developments and will have zero visual impact on the aesthetic value of the area.

Given the absence of heritage and archaeological resources on 32/257, the impact of the proposed activity will have no impact on the heritage value of the area.

Furthermore, since there are no significant heritage resources or features associated with 32/257, the proposed activity will have no impact on the existing and already altered cultural landscape of the area. For the same reason there will be no cumulative impact on the heritage value of the area.

7. Conclusions and Recommendations

The following conclusions and recommendations are arrived at after reviewing information obtained through:

- previous heritage studies and HWC applications in the vicinity of 32/257,
- Prof John Pether's palaeontological inputs,
- SG Diagrams,
- historic and Google Earth aerial photographs, and
- a site inspection (archaeological walk-through).

"The site is located at about 100 m asl. on a vegetated dune ridge in a dune field assigned to the Strandveld Formation. The palaeontological sensitivity of the Strandveld Formation dune sands is not rated on the SAHRIS Palaeo-Map. Away from the immediate coast the fossil potential of the Strandveld Formation sands is poor overall and animal bones and marine shells included in these latest Quaternary dunes, mainly deposited during the last 12 thousand years, are expected to be in an archaeological context. Nevertheless, the fossil bones of large mammals are very occasionally found in dune-sand mines, such as elephant, hippo, rhino and antelopes, the large bones being more easily seen. These finds in young dunes are often referred to as "subfossils". Some finds are interesting in that they record the presence of fauna that has been lost in historical times" (Pether 2026, pg. 2 & 3).

"The relatively small scale of the excavated subsurface volume entailed in the proposed development renders the likelihood of intersecting the very sparsely distributed fossil bones improbable and such finds would very likely be the remains of species living today. Consequently the palaeontological sensitivity of the Strandveld Fm. sands in the vicinity of the development footprint is considered to be LOW to MARGINAL" (Pether 2026, pg. 3).

"The proposed construction of a dwelling and associated facilities on Portion 32 of Farm 257 is not anticipated to have an impact on palaeontological heritage and a Palaeontological Impact Assessment and further investigation are not required" (Pether 2026, pg. 3).

An archaeological walk-through revealed that the affected portion of the larger property for the proposed development footprint is situated on a vegetated dune of sterile aeolian sands where no heritage resources of either pre-colonial or colonial origin were seen. The northern portion of the property is impacted by informal road building and the remains of modern camp sites where modern debris is strewn about. The presence of plastic, glass, and modern beer cans

suggest a very recent date for these camps. No evidence of pre-colonial shell middens or the encampments of colonial period shipwreck survivors were seen. A single Stone Age piece of questionable origin was seen in disturbed context and is rated Not Conservation Worthy.

This basic investigation has determined that no colonial or pre-colonial heritage resources of significance or value occur on 32/257. In the unlikely event that Stone Age implements are present on or in surface sediments, then they are expected to be of low local significance (Grade IIIC) and Not Conservation Worthy.

A Heritage Impact Assessment conducted by this author a few hundred meters to the SSE of 32/257 and in the same spatial, environmental and geological setting also yielded no heritage resources (Nilssen 2021). It was concluded that “Although the presence of archaeological resources in sub-surface sediments cannot be ruled out entirely, it is highly unlikely that significant archaeological resources are present in the affected area. There is no indication that development activities will have any negative impact on the heritage and archaeological value of the area” (Nilssen 2021, pg. 3).

Because no significant heritage resources are associated with 32/257, the site does not meaningfully contribute to the cultural landscape of the area. For the same reason there will be no cumulative impact on the heritage value of the area.

The site is not visible from the access road to Fransmanshoek nor from any other public roads, scenic routes or access points. Consequently, the proposed access and structure will have no impact on the aesthetic value of the area. The proposed access and structure is in keeping with existing developments on surrounding properties / small holdings.

The project has negligible socio-economic impact, but its positive impact on the Fransmanshoek conservation area outweighs the negligible to zero negative impacts this project may have on heritage resources.

Because of the above, and because there is no reason to believe that heritage resources of value will be impacted by the proposed activity on 32/257, it is recommended that the proposed activity be approved in full, and that a Heritage Impact Assessment is not warranted for the project.

Nevertheless, it is recommended that Heritage Western Cape consider and/or require that the following be included in the Environmental Authorisation / Environmental Management Program, if the project is approved:

- due to the findings of this and previous archaeological studies, archaeological monitoring is NOT recommended, but,
- if any human remains or significant archaeological / palaeontological materials are exposed during excavations, then the find should be protected from further disturbance and work in the immediate area should be halted and Heritage Western Cape must be notified immediately. These heritage resources are protected by Section 36(3)(a) and Section 35(4) of the NHRA (Act 25 of 1999) respectively and may not be damaged or disturbed in any way without a permit from the heritage authorities. Any work in mitigation, if deemed appropriate, should be commissioned and completed before construction continues in the affected area and will be at the expense of the developer.

8. References & Bibliography

Deacon, H.J. 1989. Archaeological Impact Assessment Mossqass Project – Vleesbaai. Report prepared for Mossqass. Department of Archaeology, University of Stellenbosch.

De Kock, S. 2020. Background Information Document to Notice of Intent To Develop (NID) in Terms of Section 38(8) Of The National Heritage Resources Act, 1999 (Act 25 Of 1999) - Construction of Two Dwellings & Access Road on Portions of the Farm Misgunst Aan De Gouritz Rivier 257/19 (Fransmanshoek Peninsula), Mossel Bay District and Municipality.

Delport, I. 2025. Screening Report for an Environmental Authorization as Required by the 2014 EIA Regulations – Proposed Transformation of Land/Indigenous Vegetation, Portion 32 of Farm 257, Vleesbaai, Mossel Bay Municipality.

Halkett, D and Hart, T. 1996. Phase 1 Archaeological Investigation of Land at the Mouth of the Gouritz River. (SAHRIS MAPID 01866).

Malan, J.A. 1990. The Stratigraphy and Sedimentology of the Bredasdorp Group, Southern Cape Province. Unpublished MSc thesis, University of Cape Town.

Kaplan, J. 1995. An Archaeological Survey of Rein's Nature Reserve, Southern Cape Coast. (SAHRIS MAPID 02527)

Kaplan, J. 2004. Phase 1 Archaeological Impact Assessment - Proposed Development Phase II and Phase III Nautilus Bay Mossel Bay. (SAHRIS MAPID 00116)

Nilssen, P.J. 2021. Heritage Impact Assessment Focused on an archaeological foot survey and Public Consultation process, HWC Case 20072309SB0729E, Proposed Construction of Two Dwellings & Access Road on Portions of the Farm Misgunst Aan De Gouritz Rivier 257/19 (Fransmanshoek Peninsula), Mossel Bay, Western Cape Province.

Pether J. 2021. Palaeontological Assessment Proposed Residential Development on Portion 126 of Farm Matjesfontein 304, Keurboomstrand, Plettenberg Bay Bitou Municipality, Knysna Magisterial District, Western Cape.

Pether, J. 2020. Palaeontological Impact Assessment (Desktop Study) Proposed L'agulhas Lifestyle and Retirement Estate on Erfs 678, 679 And 680, Cape Agulhas Municipality, Bredasdorp District, Western Cape.

Schulz, K., 2010. Historic background report, Farm Keerom 264, Rem Farm Vleeschbaai (Vlees Bay) 251 & Portion 2 Farm, Misgunst aan de Gouritz 257.



Figure 3. Area enlarged from Figure 1 showing 32/257 (green polygon in centre) and surrounding properties and developments. Courtesy of Cape Farm Mapper.

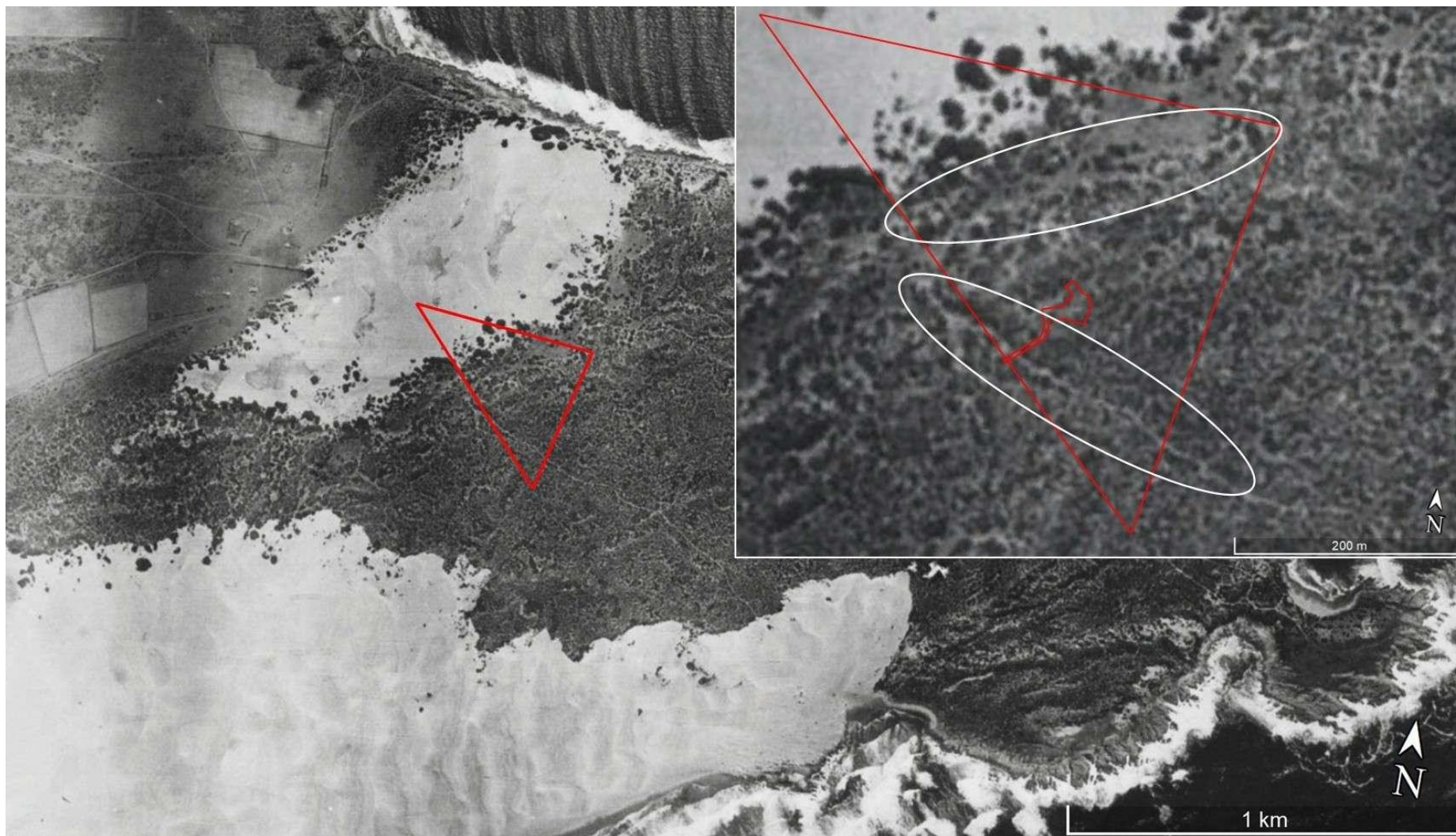


Figure 24. Location of 32/257 (red triangle) superimposed with Google Earth on 1942 aerial imagery for the area (Aerial survey 171, Flight Strip 14, Image 6035, NGS). Note dune fields, agricultural activities in top left quadrant of image and faintly visible tracks running through the property (white ellipses in inset).

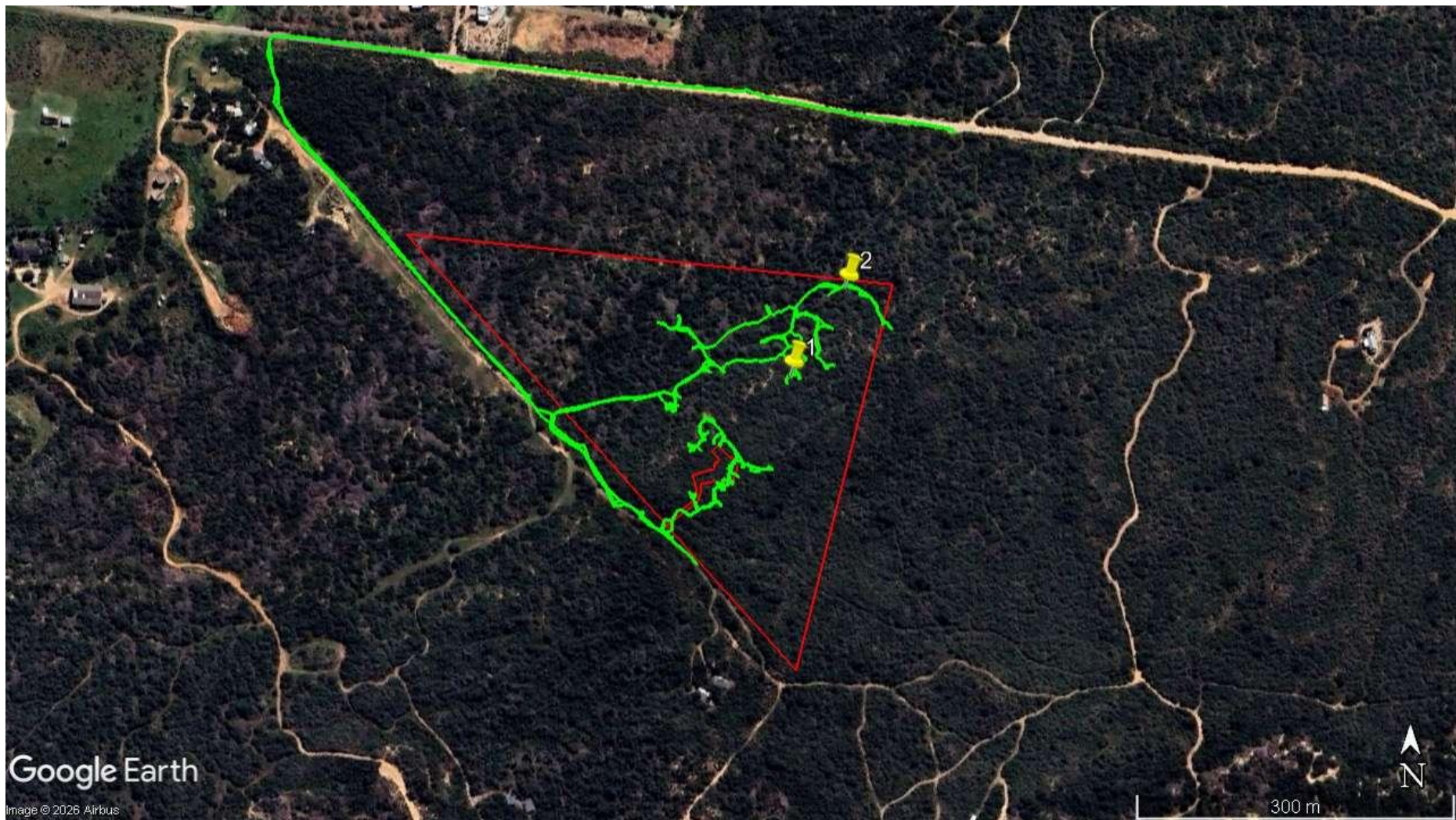


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