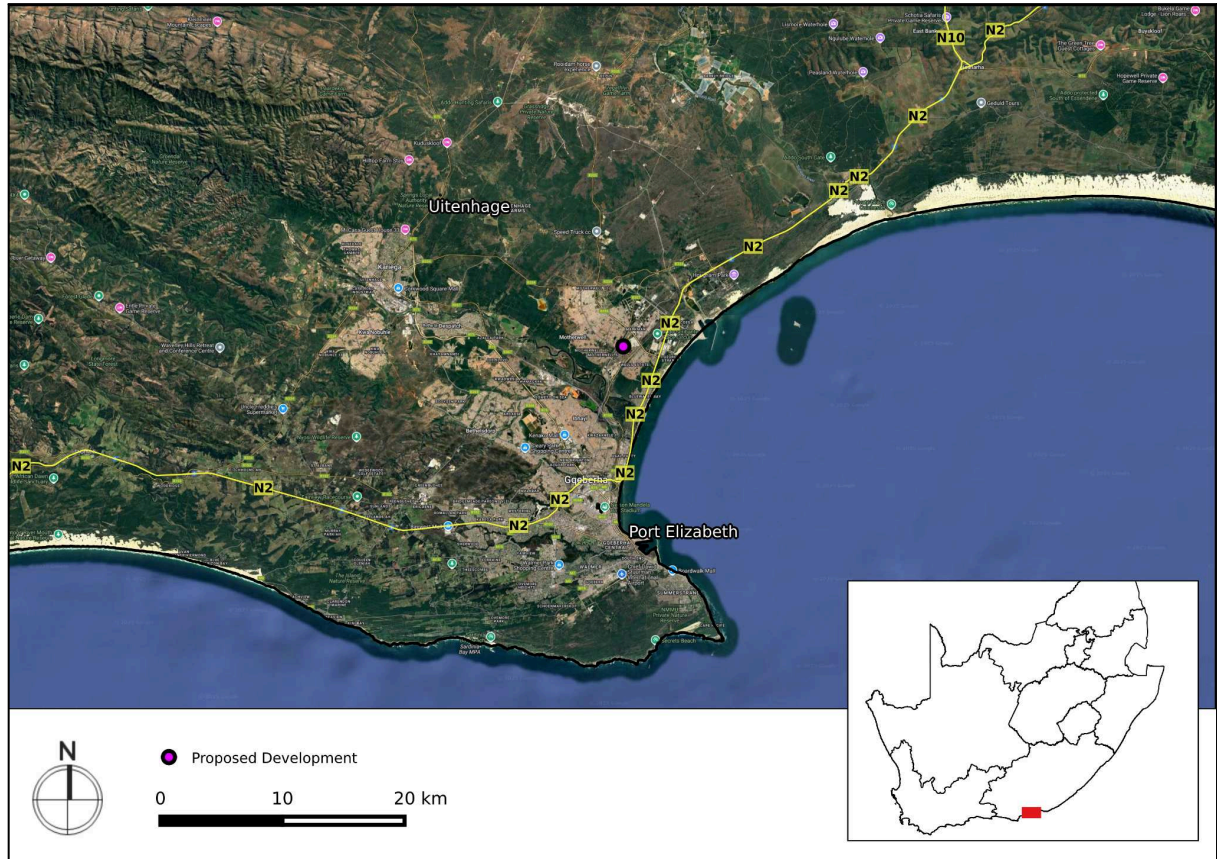




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HERITAGE SCREENER

CTS Reference Number:	CTS25_339		
Client:	PHS		
Date:	September 2025		
Title:	The proposed New Industrial Park (Warehouses and Offices) to be located on ERF 10301, WELLS ESTATE SOUTH, GQEBERHA.		
Recommendation by CTS Heritage Specialists	<p>RECOMMENDATION</p> <p>As site visit completed by the EAP confirmed that the site is trashed, there is litter as well as old and new building rubble scattered everywhere. The surface is also heavily disturbed with the exception of some intact vegetation in the North Western area regarded as no-go area that will not be developed. The area is unsafe. The EAP had armed guards in attendance. People are running cattle and doing bush cutting. As such, the surface is significantly disturbed and no evidence of any archaeological material is possibly visible as a result. The site is located in an industrial and low income squatter area.</p> <p>Based on the available information, it is unlikely that the proposed development will impact on significant heritage resources and as such, it is recommended that a no further Heritage Impact Assessment is required for this development.</p>		



1. Proposed Development Summary

The proposed New Industrial Park (Warehouses and Offices) to be located on ERF 10301, WELLS ESTATE SOUTH, GQEBERHA.

2. Application References

Name of relevant heritage authority(s)	ECPHRA
Name of decision making authority(s)	Department of Economic Development, Environmental Affairs and Tourism (Eastern Cape Province) i/o NEMA.

3. Property Information

Latitude / Longitude	25.6155229, -33.8155832
Erf number / Farm number	ERF 10301, WELLS ESTATE SOUTH, GQEBERHA
Local Municipality	Gqeberha
District Municipality	Gqeberha
Province	Eastern Cape
Current Use	Vacant
Current Zoning	Industrial Zone 1

4. Nature of the Proposed Development

Total Surface Area of development	16.6451 ha
Depth of excavation (m)	Standard building excavations.
Height of development (m)	Maximum height is 21m.



5. Category of Development

X	Triggers: Section 38(8) of the National Heritage Resources Act
	Triggers: Section 38(1) of the National Heritage Resources Act
	1. Construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier over 300m in length.
	2. Construction of a bridge or similar structure exceeding 50m in length.
	3. Any development or activity that will change the character of a site-
x	a) exceeding 5 000m ² in extent
	b) involving three or more existing erven or subdivisions thereof
	c) involving three or more erven or divisions thereof which have been consolidated within the past five years
	4. Rezoning of a site exceeding 10 000m ²
	5. Other (state):

6. Additional Infrastructure Required for this Development

A stormwater channel will be constructed to direct SW off site and into the existing man-made channel to the East.



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7. Mapping (please see Appendix 3 and 4 for a full description of our methodology and map legends)



Figure 1.1 Overview Map. Satellite image (2025) indicating the proposed development area at closer range.

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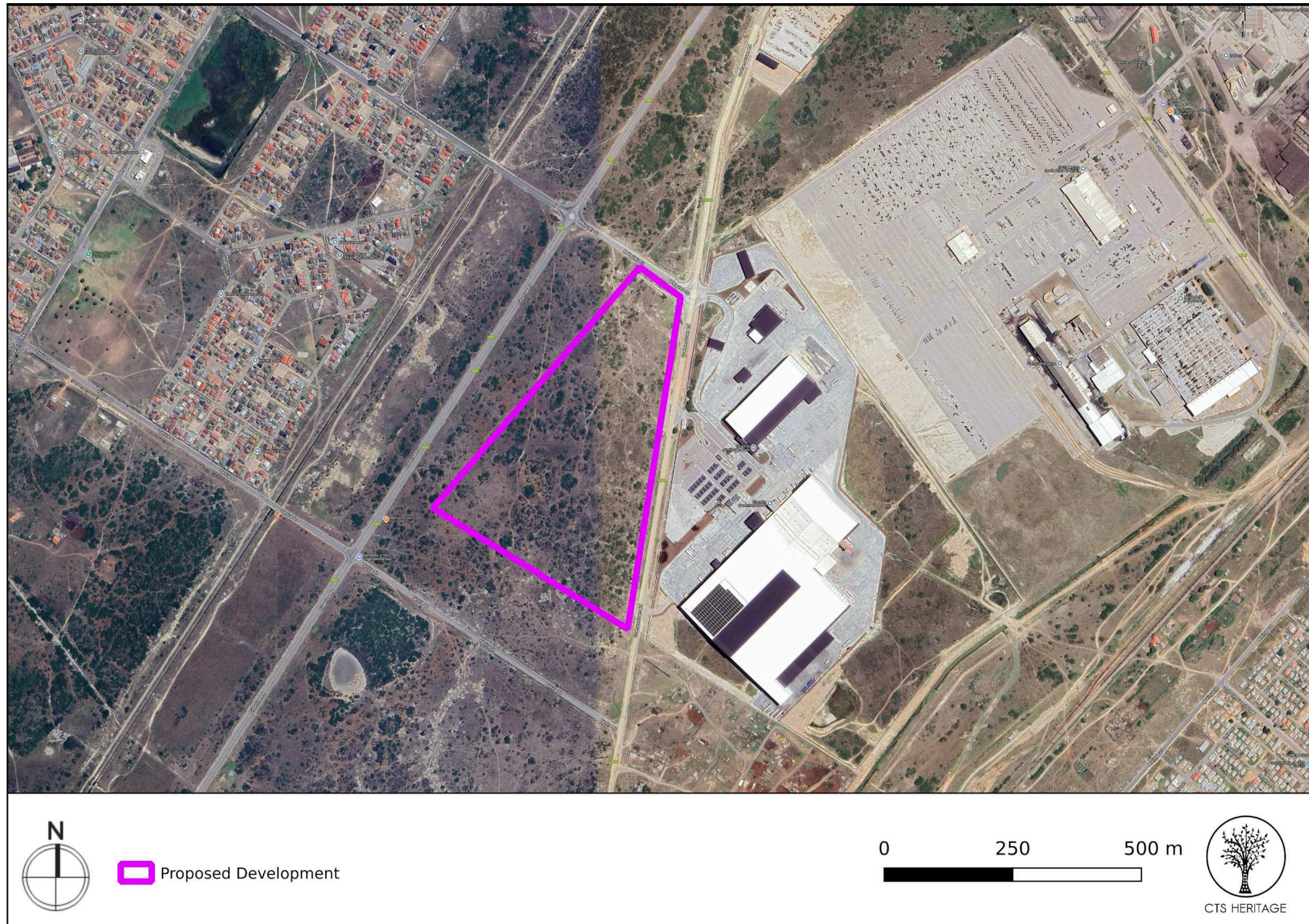


Figure 1.2 Overview Map. Satellite image (2025) indicating the proposed development at closer range.



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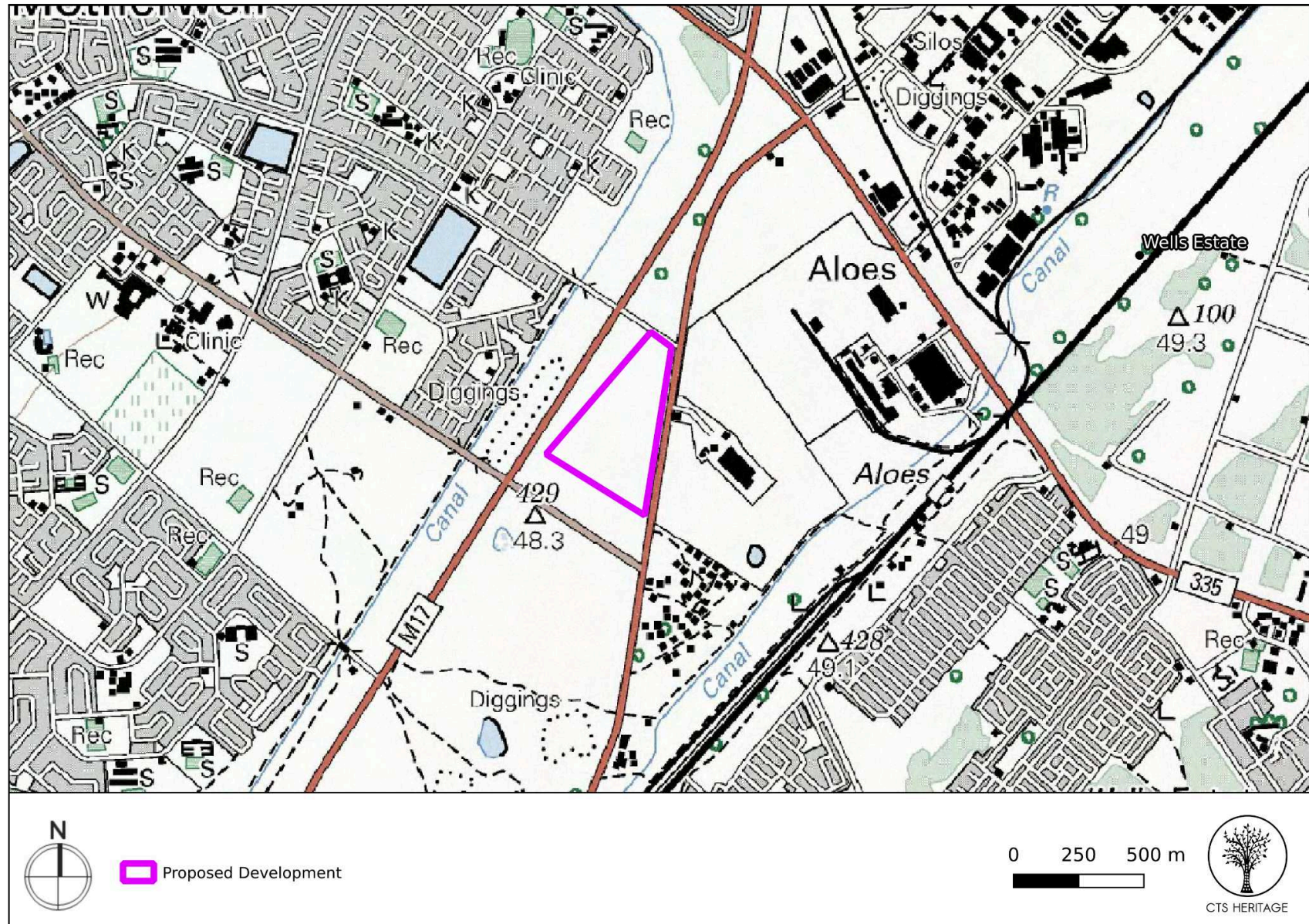


Figure 1.3 Overview Map. 1:50 000 Topo Map for the development area

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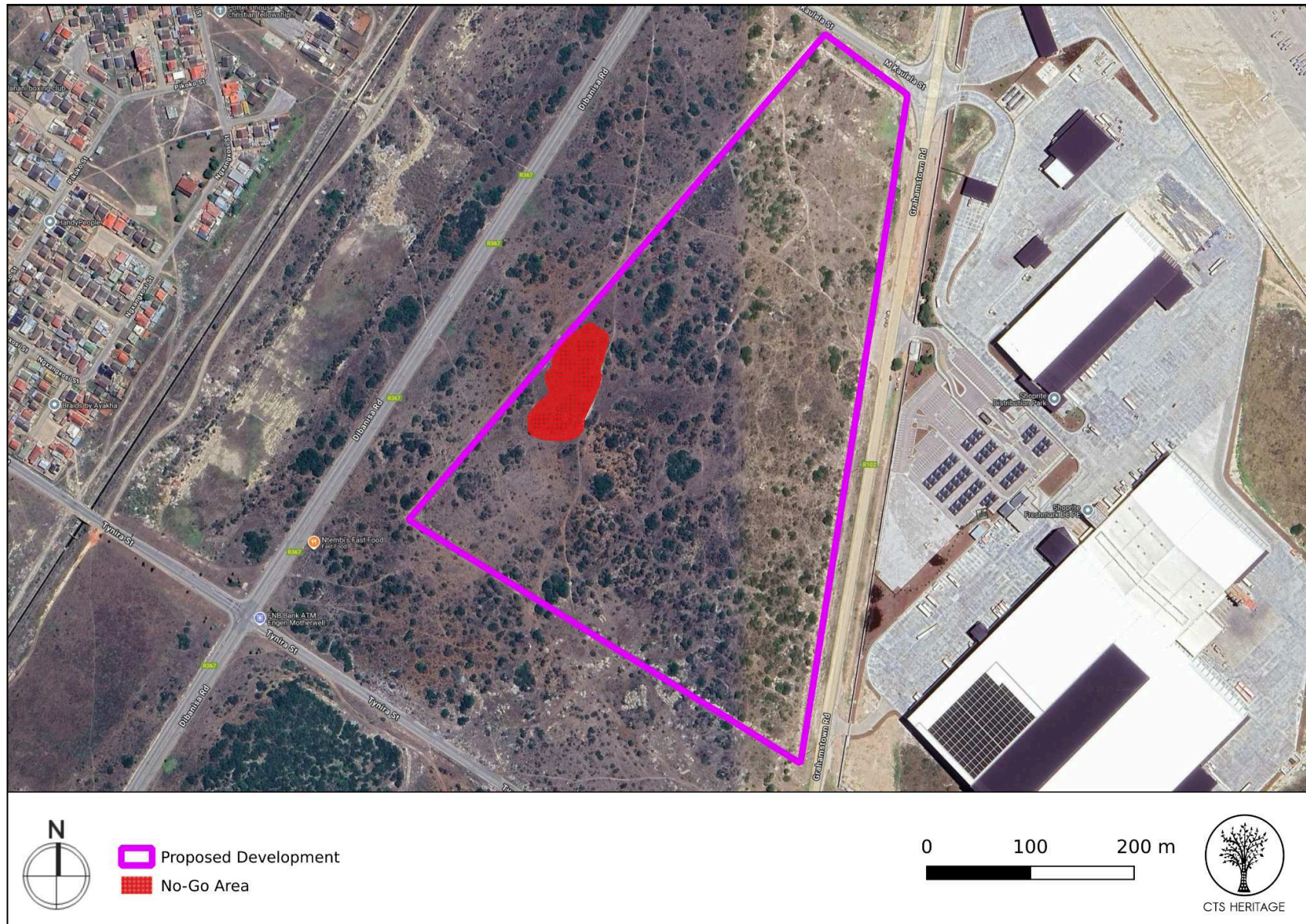


Figure 1.4 Overview Map. Development area with no-go area indicated

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Figure 1.5 Overview Map. Site Plan

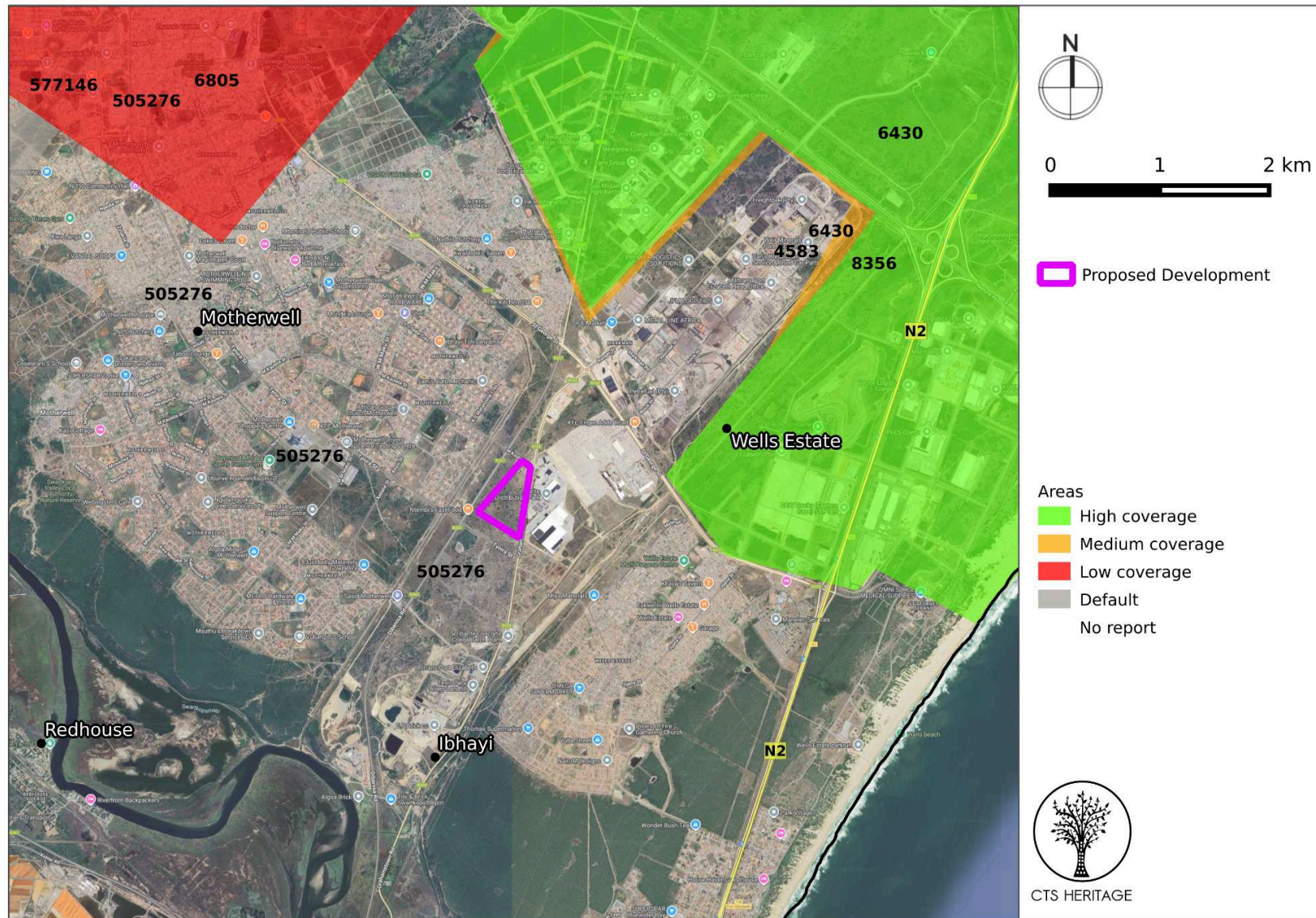


Figure 2. Previous HIAs Map. Previous Heritage Impact Assessments surrounding the proposed development area, with SAHRIS NIDS indicated. Please see Appendix 2 for a full reference list.

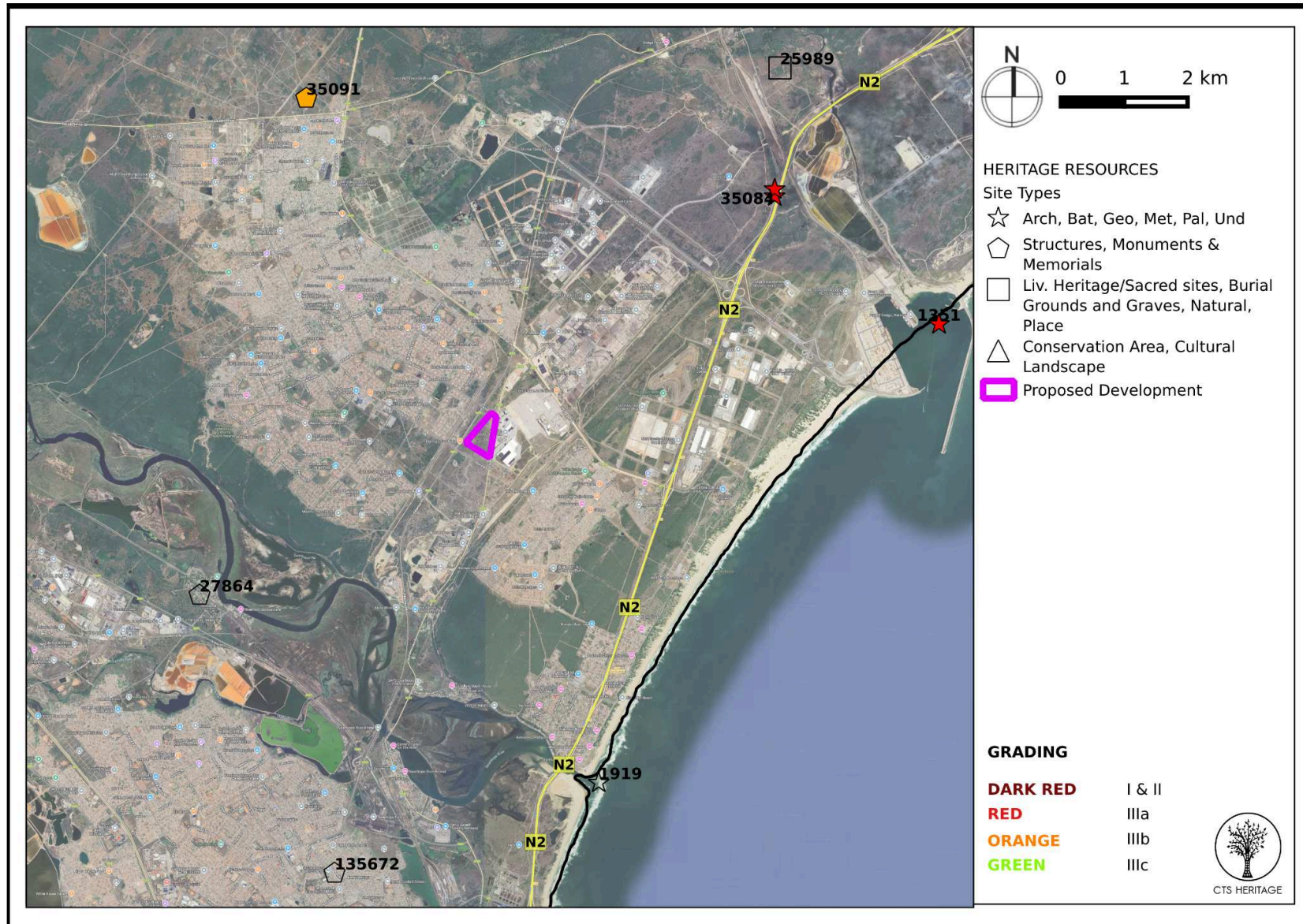


Figure 3.1 Heritage Resources Map. Heritage Resources previously identified in and near the study area, with SAHRIS Site IDs indicated. Please See Appendix 4 for a full description of heritage resource types.



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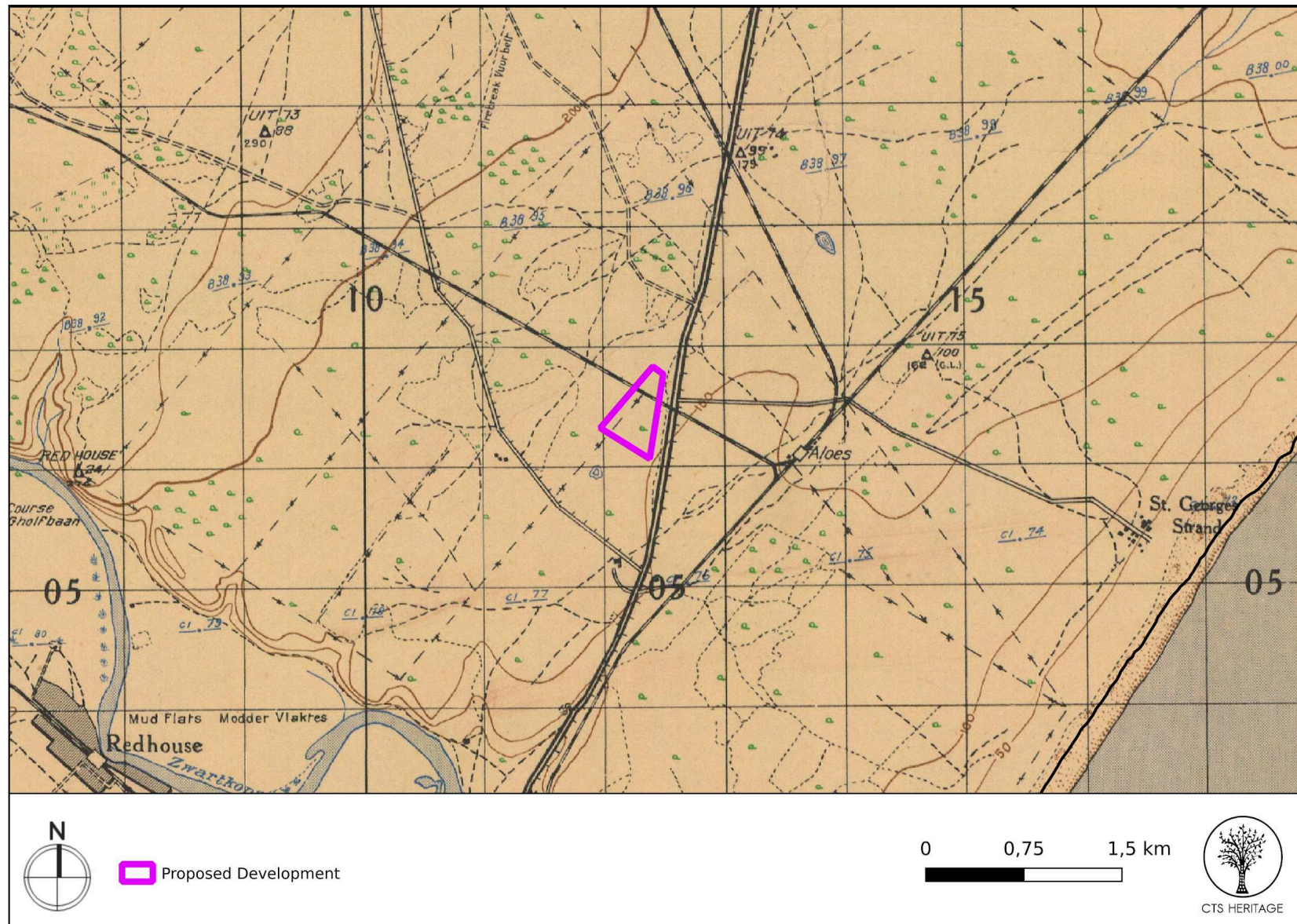


Figure 3.2 First Edition Topo Map 1:50 000.



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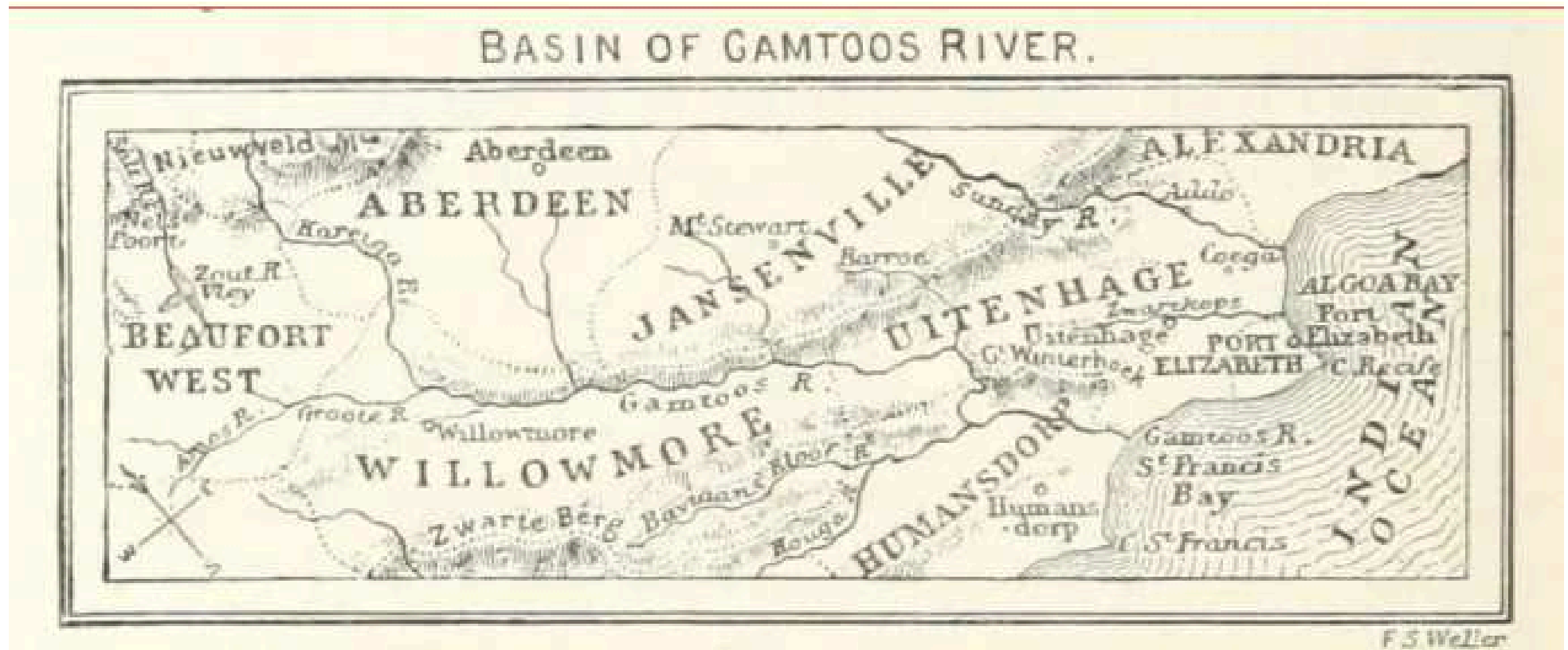
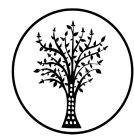


Figure 3.3 Overview Map. Historic Map of the Gamtoos River Basin¹.

¹ <https://htxt.co.za/2013/12/10-amazing-old-maps-of-southern-africa-from-the-british-library/>



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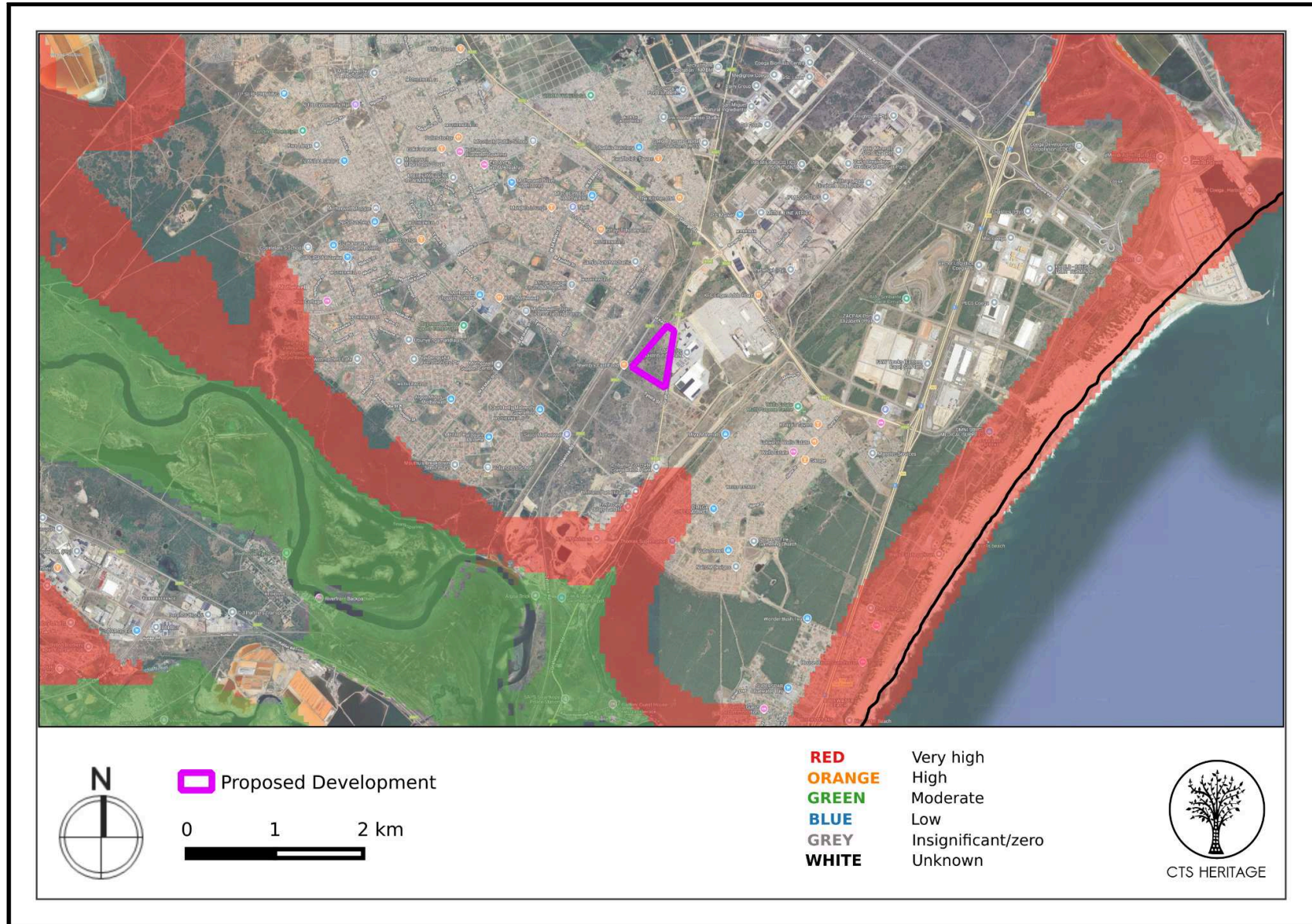


Figure 4.1 Palaeosensitivity Map. Indicating Very High fossil sensitivity underlying the study area. Please See Appendix 3 for a full guide to the legend.

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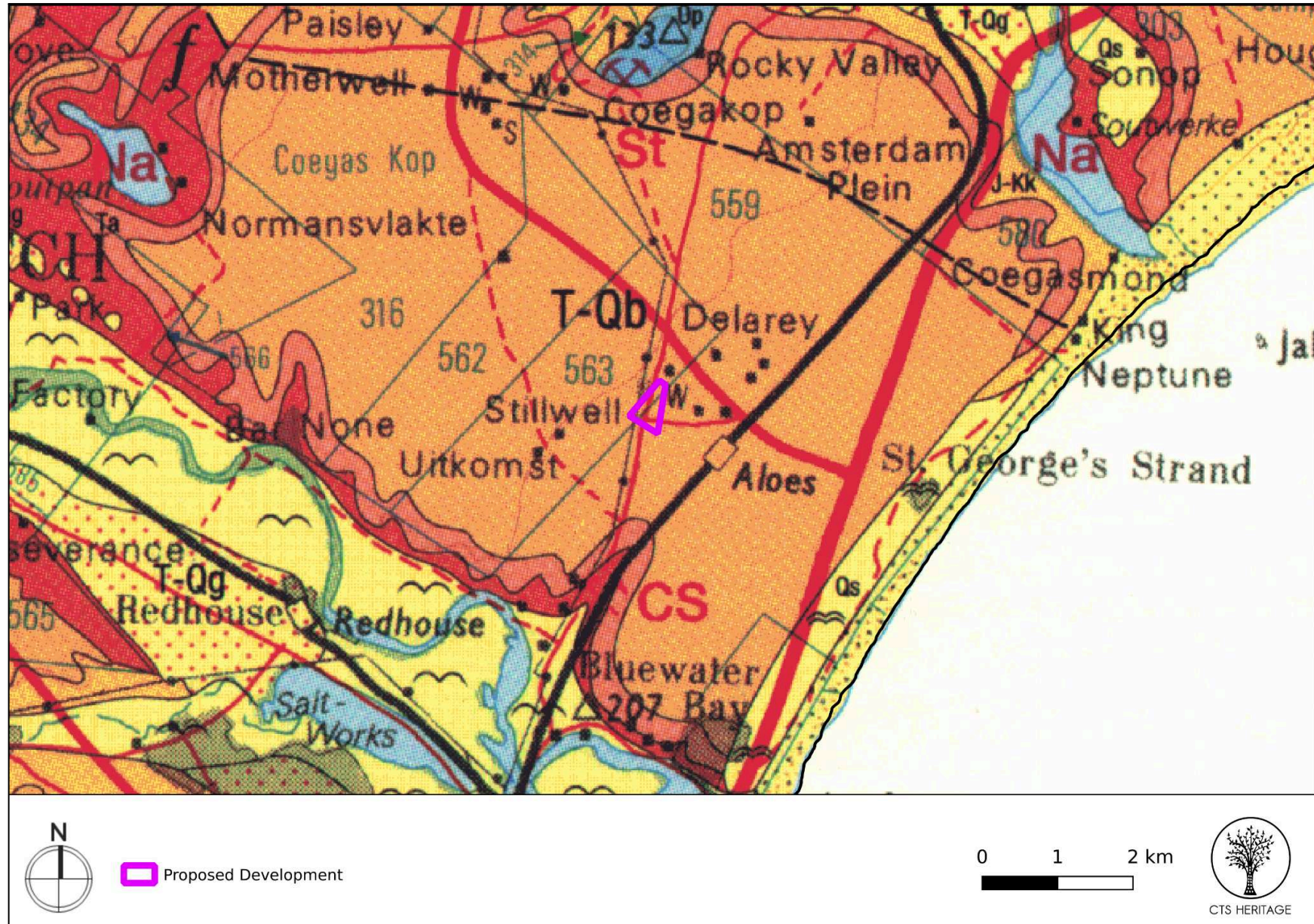


Figure 4.2 Geology Map. Extract from the CGS 3324 Port Elizabeth Geology Map indicating that the development area is underlain by T-Qb: Bluewater Bay Formation



8. Heritage statement and character of the area

Background

This application is for the proposed development of a New Industrial Park (Warehouses and Offices) to be located opposite the existing Shoprite Checkers distribution centre located in the Coega Industrial Development Zone (IDZ) located north of Gqeberha (previously known as Port Elizabeth) within the Nelson Mandela Bay Metropolitan area. In 2022 and 2023, PHS Environmental Consultants undertook a BAR and received Environmental Authorisation for the PROPOSED EXPANSION OF THE EXISTING SHOPRITE CHECKERS DISTRIBUTION CENTRE SITUATED ON ERF 8741 WELLS ESTATE, EASTERN CAPE PROVINCE. This application is recorded on SAHRIS as Case 16442. ERF 10301 was recently subdivided from ERF 8741 WELLS ESTATE.

The SEZ was established in 1999, and its name, "Coega," comes from a Nguni borrowed word from Khoekhoen, which means "ground water". The Xhosa language name for Coega, Ngqura, is used for the adjacent Port of Ngqura. According to Raper et al (2014), Coega *"takes its name from the Coega River. Derived from Khoikhoi, the name has been explained in several ways, namely as meaning 'ground river' or 'soil river', from kchou (1697), xkhu (1788), modern !hu, 'ground'; as 'many Acacia trees', from cho (1685), modern //khu, 'thorn'; or as 'thorn basin'. Topographical support for the latter explanation is found in the name Doornkom, Dutch for 'thorn basin', on the Coega River. The Coega Industrial Development Zone (IDZ) covering 110 km² of land, is situated within the Nelson Mandela Metropolitan Municipality near Port Elizabeth."*

The site proposed for development is located outside the historic centre of Port Elizabeth. Gqeberha, as Port Elizabeth is now known, was established as a part of the Cape Colony in the 1820s to settle British immigrants. The town is also known as the Friendly City, the Windy City, *"grew from a military station known as Fort Frederick, established in 1799, and developed more rapidly after the arrival of the 1820 Settlers, attaining municipal status in 1868 and becoming a city in July 1913. Named in 1820 by Sir Rufane Donkin (1773-1841), Acting Governor of the Cape, in honour of his wife, Elizabeth Frances, who had died of fever in India two years previously."* (Raper et al, 2014). Gqeberha was also previously known as Fort Frederick, *"taken from a fort erected at the mouth of the Bakens River in 1799 by Lieutenant-General Francis Dundas. The first British structure in the Eastern Cape, the fort was named in honour of Frederick, the Duke of York. It was proclaimed a national monument in 1940."* (Raper et al, 2014). PE was renamed to Gqeberha in 2021, which is the *"Xhosa name for Driftsands Reserve, 4 km south of Port Elizabeth. Thought to be an adaptation derived from Khoikhoi //khaib, //khaeb, 'riversand', 'driftsand'"* (Raper et al, 2014). The proposed pipelines also run across the Amsterdam Flats (Figure 3.2), which is a *"region between the Swartkops and Coega rivers, near Port Elizabeth. Named after the Dutch East India Company ship Amsterdam, which was wrecked on 15 December 1817. The settlement Amsterdamhoek was also named after that ship"* (Raper et al, 2014).

The area proposed for development is located just south of Motherwell. According to Smuts and Van Schalkwyk (2018, SAHRIS NID 505276), *"Motherwell itself, which is located some 18km north of Port Elizabeth, was established in 1982, to accommodate black people who had settled elsewhere in Port Elizabeth illegally, and to house the influx of migrant workers. The area is economically deprived, and comprises RDP housing and shacks, schools, shopping centres and similar infrastructure."*

Historical Background

Hunters and gatherers ancestral to the San first settled the area around Gqeberha at least 10,000 years ago. Around 2,000 years ago, they were gradually displaced or assimilated by agriculturalist populations ancestral to the Xhosa people, who migrated into the region from the north.

The area proposed for development is located approximately 5km north of the Swartkops River. *"In 1752 the Governor of the Cape, Rijk Tulbagh, ordered the first expedition to this far-flung area, under Ensign Beutler. On cartographer Wentzel's resulting map, the river is named, the setting up of a D.E.I.C. possessional beacon at the mouth is recorded, and the whole bay is named Zwartkops Riviers Bay. Succeeding maps into the 1800s kept this name along with the alternative Baay de la Goa. Barrow's map of 1801 also shows the "Swartkops Rivier Bergen" in the interior and the military map of 1818 has the Swartkops Mountains. The origin of the name was a matter for speculation. For example, the Coega Koppies have only now been quarried out of existence, but they used to be prominent and could have been seen clearly from ships at sea. The late Hans Huisman was especially intrigued and after much research concluded that the "black hills" are the two main peaks of the Groot Winterhoek range: Cockscomb and Tierhoekberg. The Khoi name for this area was "Zungah", which means "black or dark heads", so this is simply another example of a direct translation into Dutch. In 1820 Capt.*



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Fairfax Moresby of HMS “Menai” noted that the Zwartkops would become “a river of the first consequence if Port Elizabeth should continue to flourish” and that it was possible for ships to cross the bar for much of the time.”²

Any map of the area surrounding Port Elizabeth extending outwards to the Gamtoos River in the west and Sundays River in the northeast in the 1820s depicts less than two dozen farms, all with Dutch names. This reflects the fact that from the 1770s onwards the Trekboere had settled here on their *quitrent* farms,³ including Willem van Staden on the farm Coega.⁴ All of the loans farms in the Swartkops area were ultimately given as government grants to the occupiers as quitrent farms. In 1813, the Governor, Sir John Cradock, issued an ordinance of quitrent. Apparently, in the 1970s, there were 67 house-owners who were quitrent holders in the Swartkops area.⁵

Cultural Landscape

According to Smuts and Van Schalkwyk in an HIA that is located west of the proposed development (2018, SAHRIS NID 505276), the receiving environment near to Motherwell is *“highly disturbed ground. The southern third of the extension crosses undeveloped land, but much of this is disturbed due to its proximity to Motherwell at the north, and is criss-crossed with footpaths and a gravel track. To the south, closest to the railway line, there is light industry, in the form of brickworks, a concrete plant and waste site... Motherwell is situated near the junction of the winter and summer rainfall areas, and experiences a warm temperate climate. Rainfall predominantly occurs in Spring and Autumn, and averages about 400mm per year, while strong winds are common all year round (Coetzee et al. 1996). The naturally occurring vegetation in this region is Albany Thicket, though little to none of this survives in the study area, where there is open veld with grass and low shrubs.”*

According to Map 3 in Binneman’s report for the Coega Industrial Development Zone (IDZ, Figure 2.2), *“The Coega River valley comprises most of the zone. For many years farming, brick making and salt producing activities disturbed and changed the vlei/wetlands along the river, and more recently dumping of building and other rubble, the construction of a massive railway yard, roads and power lines restructured the landscape. Several old farm houses and other buildings have been demolished throughout the zone. Notwithstanding there are still large areas covered with impenetrable thicket vegetation and dense grass, especially areas adjacent to the river and eastern plateaux. The western area of the zone (west of the railway line has been disturbed in the past by farming activities.”*

The Coega kop is located north east of the development area. Bennie (2010. SAHRIS NID 132671) noted the following regarding this important landscape resource, *“Brief History A plan by P.G. Elemans, dated 15 July 1834, shows the location of “Koega Kop”, while a chart by Lieutenant Joseph Dayman RN in 1855, illustrates Coega Kop with the north-eastern kop at 480 feet (146.2m) and the south-western kop at 466 feet (142m). Coega Kop has twin heads, but from the 1920’s the south-western kop was heavily quarried by the South African Railways and Harbours for stone-filling used in the development of the Port Elizabeth Harbour, the ultimate intention being the removal of both hills. Mr C.G.H.Skead in a 1920’s postcard wrote that the twin kops had been used by early sailing ship captains as navigating beacons when entering Algoa Bay. In the 1970’s the north-eastern kop was being quarried by a private concern. Over the past few years (2010) it has again been heavily utilised for the construction of the Port of Ngqura with much of the landmark features disappearing. “As the proposed development is located some distance from the koppie, no impact is anticipated.*

Archaeology and Built Environment

The Coega area has been inhabited since the Early Stone Age, with significant ESA artefacts and organic remains recorded at Amanzi Springs (just north of Motherwell, approximately 15km northwest of the proposed development) and hand axes at Coega Kop (less than 300m from the western end of the proposed rising main pipeline) and along the Coega River. Middle Stone Age tools and fossil animal remains, dated to over 37,000 years ago, have been found in gravels, limestone, and subsurface deposits. Later Stone Age sites are the most common, including inland campsites and numerous coastal and inland shell middens dating to the past ~6,000 years, linked to San hunter-gatherers and later Khoekhoen herders, distinguishable by ceramics and domesticated animal bones. From around AD 700, Bantu-speaking agropastoralists arrived,

² <https://thecasualobserver.co.za/port-elizabeth-of-yore-a-brief-history-of-the-land-around-the-mouth-of-the-swartkops-river/>

³ <https://thecasualobserver.co.za/port-elizabeth-of-yore-land-ownership-in-the-1820s/>

⁴ <https://thecasualobserver.co.za/port-elizabeth-yore-baakens-pristine-lagoon-commercial-area/>

⁵ <https://thecasualobserver.co.za/port-elizabeth-yore-redhouse/>



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farming crops and livestock and working metal, followed by European settlement in the early 1600s and intensified after 1820 with the 1820 Settlers, which brought fortified farms, historic buildings, and military forts due to ongoing conflict, including nine Frontier Wars (1702–1878). The region also contains heritage from Apartheid and the Struggle, notably Red Location township (approximately 15km south west of the study area), significant in anti-apartheid resistance. Graves are present across the larger area, often linked to historic farms, communities, cairn burials, and prehistoric sites such as shell middens, with potential burials at both recent and abandoned settlements (Smuts and Van Schalkwyk, 2018, SAHRIS NID 505276 - provide an expansive history of which just a summary is presented here).

Most of the nearby archaeological sites are either related to shell middens and stone-age lithics or nearby shipwrecks. Binneman (2010, SAHRIS NID 6430) further notes that archaeological investigations near the Coega Harbour began in 1994, revealing Later Stone Age hunter-gatherer sites within 300 m of the beach, containing hornfels and silcrete stone tools, pottery, and occasional Middle Stone Age artefacts, dating to the past 5,000 years. Follow-up surveys in the late 1990s for harbour development recorded in situ and deflated shell middens, scattered Holocene Later Stone Age tools, rare Khoekoen pottery (last 2,000 years), and isolated Middle Stone Age tools, though no clear activity patterns emerged. Subsequent work (2006–2010) along the eastern coast and dune systems found additional weathered Middle Stone Age tools, new Later Stone Age sites dating from the past 8,000 years, and human remains near the abalone farm; some earlier sites were lost under shifting dunes. Surveys in inland zones for infrastructure projects mostly yielded scattered Early, Middle, and some Late Stone Age tools.

Binneman's 2010 survey of the Coega IDZ found archaeological material across the area, including coastal and dune shell middens, as well as Earlier, Middle, and Later Stone Age tools inland. Tools were mostly in topsoil or on exposed calcrete, with Middle Stone Age examples concentrated in gravel areas. These consisted mainly of small, informal flakes and chunks, with few cores, points, or blades, and limited retouch. Most tools were in secondary contexts with no clear spatial patterning or manufacturing sites visible. Because artefacts were widely scattered, only concentrated occurrences were recorded as representative samples.

According to Binneman (2010, SAHRIS NID 6430), *“The oldest evidence for prehistoric people living in the wider region comes from the river gravels which line the Coega River valley/estuary. Large stone tools, called handaxes and cleavers, dating from the Early Stone Age, approximately 1,5 million years to 250 000 years ago, were found mixed with river gravels. There were no other cultural material or food remains, i.e., bones of animals preserved. These stone tools were in secondary context (disturbed or transported from their original place of manufacture) and provided limited information.*

The oldest evidence for prehistoric groups living along the Coega River coast is a few weathered Middle Stone Age stone tools. These stone tools, points and blades, were manufactured between 30 000 and 250 000 years ago (late Pleistocene). No other cultural or food remains (shellfish, marine fauna or terrestrial fauna) were preserved. Fossil bone (bone hardened by ground water and minerals) was found in limestone or calcrete deposits some 5 kilometres inland from the Coega estuary associated with Middle Stone Age stone tools.

The majority of the archaeological remains found during the surveys were accumulations or heaps of shell (shell middens) and stone tools. These remains date from the past 10 000 years (Holocene). These accumulations of shell, called shell middens, are often concentrated opposite or near rock outcrops where an abundant and a wide range of shellfish species are to be found in the intertidal zone.”

In the AIA completed by Binneman (2010, SAHRIS NID 6430), he notes that *“A large part of the Coega IDZ investigated is within 5 km from the coast (maximum distance inland that coastal archaeological remains will be found) and such material may be found during developments. Although the stone tools appear to be of low cultural sensitivity, other archaeological sites/materials may be exposed when the vegetation and top soil are removed (for example human remains).”* The proposed development is located within this 5km sensitivity area from the coast mentioned by Binneman (2010), similar precautions exist.

The field survey for Smuts and Van Schalkwyk (2018) identified no heritage resources within the area that they assessed, with an additional observation that *“the degraded and disturbed condition of the local environment makes it highly unlikely that any heritage resources will be found in the course of the proposed development.”*

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Based on the extensively disturbed nature of the area proposed for development, it is very unlikely that the proposed development will impact on significant, *in situ* archaeological resources. In addition, there are clearly no structures of any kind located within the proposed development area which may have heritage significance. As such, it is recommended that no further archaeological assessments are required. However, should any archaeological resources or human remains be uncovered during the course of construction, work must cease and ECPHRA must be notified.

Palaeontology

According to the SAHRA Palaeosensitivity map, the area proposed for development is underlain by sediments of unknown palaeontological sensitivity. According to the extract from the CGS Map for Port Elizabeth 3324 the development area is underlain by Op: Peninsula Formation in the Table Mountain Group, J-Kk: Kirkwood Formation in the Uitenhage Group, Ta: Alexandria Formation in the Algoa Group, T-Qb: Bluewater Bay Formation, T-Qg: Quaternary Gravel and ~: Quaternary Alluvium.

T-Qb - Bluewater Bay Formation. According to Almond (2010, SAHRIS ID 109216), “*Karstic (solution) weathering of the extensive Alexandria Formation limestone plateau has led to the formation of a distinctive reddish-brown pebbly deposit that was previously assigned to a separate stratigraphic unit (the so-called Bluewater Bay Formation, T-Qb).*”

T-Qg - Quaternary Gravel - Insignificant Sensitivity and ~ - Quaternary Alluvium - Moderate Sensitivity. According to Wilken (2023) The Quaternary Sands in the area are relatively recent deposits. These sediments have been reworked over the last 2 Ma. From a palaeontological standpoint these sediments are of low concern

Op - Peninsula Formation - Table Mountain Group: Low sensitivity. According to the SAHRIS Fossil Heritage Browser this formation is known for sparse shallow marine / coastal / estuarine to freshwater trace fossils, including eurypterid trackways, trilobite burrows.

J-Kk - Kirkwood Formation - Uitenhage Group: Very High Sensitivity. According to the SAHRIS Fossil Heritage Browser this formation is known for a variety of small to large dinosaurs (theropods, sauropods, ornithomimids), other reptiles, and Mesozoic mammals, as well as important floras of petrified wood (“Wood Beds”), leaves (ferns, cycads, conifers), freshwater invertebrates (bivalves, crustaceans) and shelly marine biotas, microfossils (Colchester Shale Member). Additional comments on the browser notes that the Algoa Basin of Eastern Cape is the key area for terrestrial and shallow marine biotas of the Uitenhage Group in South Africa. Undescribed large dinosaur remains from the Kirkwood Formation. Almond (2010, SAHRIS ID 8875) noted that “*The fluvial to estuarine Kirkwood Formation (J-Kk) of the Algoa Basin consists of multi-hued, reddish-brown to grey-green mudrocks with subordinate greenish-grey sandstones. The formation has a moderate to high (occasionally very high) palaeontological sensitivity. It is famous for its plant fossils - mainly gymnosperms and ferns, including locally abundant petrified wood - as well as its rare but palaeontologically significant dinosaur remains. The Kirkwood dinosaur fauna includes a small range of gigantic sauropods, juvenile iguanodonts, stegosaurs and small-bodied theropods. Most species are only known from isolated bones and teeth, however. Apart from a single small fragment of bone, no fossils were recorded from the Kirkwood Formation during this study. Extensive recent excavations into these beds for stormwater channels in IDZ Zone 5 and new road cuttings west of Coega (not to mention large cuttings in the Portnet area) were not checked for fossil material while they were still fresh - an unfortunate lost opportunity in palaeontological heritage terms.*”

Ta - Alexandria Formation - Algoa Group: Very High Sensitivity. According to Almond (2010, SAHRIS ID 109216), “*Karstic (solution) weathering of the extensive Alexandria Formation limestone plateau has led to the formation of a distinctive reddish-brown pebbly deposit that was previously assigned to a separate stratigraphic unit (the so-called Bluewater Bay Formation, T-Qb). It infills numerous solution cavities in the upper surface of the Alexandria limestones and on the 1: 250 000 Port Elizabeth geological map it is indicated across large expanses of the IDZ. The only fossils recorded from this unit so far are sparse freshwater mussels and land snails. NESW trending zones of larger-scale (c. 100m) depressions known as dolines are clearly seen in aerial and satellite images as rounded grassy patches within darker thicket vegetation. These features are also formed by solution of the underlying limestone, are often infilled with clay-rich soils and may form pans after rain. New road construction in Coega Zone 6 has transected one of these deep doline infills which here comprises several meters of dark, mottled soil with oxidized traces of plant rootlets. Moist grassy pans might be expected to attract game, but no mammal bones or teeth were observed within the doline infill.*” Almond (2010) concludes that “*Despite its rich fossil record, the Alexandria Formation is usually*

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only sparsely fossiliferous in the Coega area, especially in its upper parts which are frequently heavily calcretised. Most excavations here are unlikely to have serious consequences for fossil heritage.”

According to the nearby HIA by Smuts and Van Schalkwyk (2018, SAHRIS NID 505276), *“which is also of very high fossil sensitivity, comprises alternating layers of calcareous sandstone, conglomerate and shelly conglomerate, and can contain a rich assemblage of marine invertebrates (Ibid.). The deposit ranges between three and 13 metres in depth across its known area of distribution (Port Elizabeth to Kowie River), and is approximately seven metres thick in the Coega area (Ibid.). The sandstone strata preserve some gastropod and pelycopod shells, as well as in situ Echinodiscus (“pansy shells”), and burrows, while the conglomerate strata contain oyster shells. The shelly conglomerate, known as coquinite, comprises approximately 70% invertebrate remains, including pelycopods, gastropods, corals, bryozoans, brachiopods, echinoids and sharks teeth, as well as some mammal bones.*

According to Gess (2007), “[a]s the Alexandria Formation appears to have been laid down in a full range of coastal depositional environments ranging from shoreface and foreshore to lagoonal and/or estuarine it is likely that further exploration of the Alexandria Formation would provide an even greater range of fossils including possibly more vertebrate remains”. However, site inspection of this deposit at the Coega IDZ has shown that “[a]part from the more robust species such as oysters and Glycimeris, many fossil shells are fragmentary and unidentifiable...[and that] much of the succession has been secondarily calcretised by circulating groundwater, normally destroying most fossil remains in the process” (Almond 2010, SAHRIS NID 8875). Despite this, Almond (2010) notes that “[s]everal of the most prolific collecting localities for the Alexandria fauna that are mentioned in the palaeontological literature are situated within the Coega IDZ” and that “upturned blocks of basal Alexandria conglomerate near the western edge of the Coega limestone quarry...are the subject of ongoing research...and need to be safeguarded”, which indicates that rich fossil finds have been discovered in the Alexandria Formation in this area.

The SAHRIS Fossil Browser (2013) identifies the greatest part of the proposed development as falling within the Bluewater Bay Formation, which is described as being of unknown fossil significance. This Formation is now thought to constitute the weathered upper expression of the Alexandria Formation, comprising distinctive reddish-brown, pebbly residual soil that has thus far yielded only freshwater mussels and land snails (Almond 2010).“

According to Almond (2010, SAHRIS ID 109216), “Karstic (solution) weathering of the extensive Alexandria Formation limestone plateau has led to the formation of a distinctive reddish-brown pebbly deposit that was previously assigned to a separate stratigraphic unit (the so-called Bluewater Bay Formation, T-Qb). It infills numerous solution cavities in the upper surface of the Alexandria limestones and on the 1: 250 000 Port Elizabeth geological map it is indicated across large expanses of the IDZ. The only fossils recorded from this unit so far are sparse freshwater mussels and land snails. NESW trending zones of larger-scale (c. 100m) depressions known as dolines are clearly seen in aerial and satellite images as rounded grassy patches within darker thicket vegetation. These features are also formed by solution of the underlying limestone, are often infilled with clay-rich soils and may form pans after rain. New road construction in Coega Zone 6 has transected one of these deep doline infills which here comprises several meters of dark, mottled soil with oxidized traces of plant rootlets. Moist grassy pans might be expected to attract game, but no mammal bones or teeth were observed within the doline infill.” Almond (2010) concludes that “Despite its rich fossil record, the Alexandria Formation is usually only sparsely fossiliferous in the Coega area, especially in its upper parts which are frequently heavily calcretised. Most excavations here are unlikely to have serious consequences for fossil heritage.”

As such, It is very unlikely that significant palaeontological resources will be impacted by the proposed development. However, it is recommended that the attached Chance Finds Procedure be adopted and implemented throughout the construction phase of the development.



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RECOMMENDATION

As site visit completed by the EAP confirmed that the site is trashed, there is litter as well as old and new building rubble scattered everywhere. The surface is also heavily disturbed with the exception of some intact vegetation in the North Western area regarded as no-go area that will not be developed. The area is unsafe. The EAP had armed guards in attendance. People are running cattle and doing bush cutting. As such, the surface is significantly disturbed and no evidence of any archaeological material is possibly visible as a result. The site is located in an industrial and low income squatter area.

Based on the available information, it is unlikely that the proposed development will impact on significant heritage resources and as such, it is recommended that a no further Heritage Impact Assessment is required for this development.

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APPENDIX 1

List of heritage resources within close proximity to the development area from SAHRIS

Site ID	Site no	Full Site Name	Site Type	Grading
29418	9/2/013/0007	Dutch Reformed Church, Main Street, Napier	Building	Grade II
38007	9/2/013/0001/001	3 Fishermen's Cottages, Hotagterklip, Struis Bay	Building	Grade II
38008	9/2/013/0001/002	9 Fishermen's Cottages, Hotagterklip, Struis Bay	Building	Grade II
38009	9/2/013/0002	Waenhuiskrans (Kassiesbaai) Fishing Village, Arniston	Cultural Landscape	Grade II
38010	9/2/013/0004	Bredasdorp Museum, Independent Street, Bredasdorp	Building	Grade II
38011	9/2/013/0005	Mountain View, Kreupelhout Drive, Bredasdorp	Building	Grade II
38014	9/2/013/0011	Dollas Downs 264, Bredasdorp District	Cultural Landscape	
38016	9/2/013/0018	Fisherman's Cottage, Pratt Street, Arniston	Building	Grade II
38017	9/2/013/0019	14 and 16 Lourens Street, Bredasdorp	Building	Grade II
42519	SHIPWRECKID1143	Dora K	Shipwreck	
43073	SHIPWRECKID1718	Anker	Shipwreck	
43095	SHIPWRECKID1740	Arniston	Shipwreck	
43155	SHIPWRECKID1800	Bodiam Castle	Shipwreck	
43336	SHIPWRECKID1983	Ellen	Shipwreck	
43733	SHIPWRECKID2383	Mackay	Shipwreck	
43869	SHIPWRECKID2521	Otto	Shipwreck	
44078	SHIPWRECKID2734	South American	Shipwreck	
44219	SHIPWRECKID2876	Waldensian	Shipwreck	
44251	SHIPWRECKID2911	Zuidam	Shipwreck	
55297	Arniston / Waenhuiskrans Cultural Landscape Cultural Landscape	Arniston	Archaeological, Conservation Area, Structures, Building	

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55298	Arniston / Waenhuiskrans / Waenhuiskrans Cultural Landscape Cultural Landscape	Arniston	Archaeological, Conservation Area, Structures, Building	
58884	Erf 416, Kassiesbaai, Waenhuiskrans Cultural Landscape	Erf 416, Kassiesbaai, Waenhuiskrans Cultural Landscape	Cultural Landscape	
81450	DD 01	Dollas Downs 01	Shell Midden, Artefacts	Grade IIIb
81451	DD 02	Dollas Downs 02	Shell Midden, Artefacts	Grade IIIa
81452	DD 03	Dollas Downs 03	Shell Midden, Artefacts	Grade IIIa
81453	DD 04	Dollas Downs 04	Shell Midden	Grade IIIc
81455	ZOET 01	Zoetendals Vlei 01	Artefacts	Grade IIIa
81456	ZOET 02	Zoetendals Vlei 02	Artefacts, Shell Midden	Grade IIIc
81457	ZOET 03	Zoetendals Vlei 03	Artefacts, Shell Midden	Grade IIIa
81458	ZOET 04	Zoetendals Vlei 04	Artefacts, Shell Midden	Grade IIIb
81459	ZOET 05	Zoetendals Vlei 05	Archaeological	Grade IIIb
81460	ZOET 06	Zoetendals Vlei 06	Archaeological	Grade IIIc
81461	ZOET 07	Zoetendals Vlei 07	Artefacts	Grade IIIc
81462	ZOET 08	Zoetendals Vlei 08	Artefacts	Grade IIIb
81463	ZOET 09	Zoetendals Vlei 09	Artefacts	Grade IIIc
81464	ZOET 10	Zoetendals Vlei 10	Artefacts	Grade IIIb
81465	ZOET 11	Zoetendals Vlei 11	Artefacts	Grade IIIb
81466	ZOET 12	Zoetendals Vlei 12	Artefacts	Grade IIIc
81467	ZOET 13	Zoetendals Vlei 13	Artefacts	Grade IIIc
81468	ZOET 14	Zoetendals Vlei 14	Shell Midden	Grade IIIb
81469	ZOET 15	Zoetendals Vlei 15	Shell Midden	Grade IIIb
82537	Existing Arniston Harbour Slipway	Arniston Harbour - Slipway	Intertidal	
98759	14 Buitenkant Street	14 Buitenkant Street, Bredasdorp	Building	

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98783	Buitenkant street	Buitenkant Street c/o Fir Lane, Bredasdorp	Building	
98784	Buitenkant Street c/o All Saints Street	Buitenkant Street c/o All Saints Street, Bredasdorp	Building	
98791	28 Long Street	28 Long Street c/o Bank Street, Bredasdorp	Building	
98793	21 Long Street c/o Fir Lane	21 Long Street c/o Fir Lane, Bredasdorp	Building	
98799	30 Long Street	30 Long Street "Jacaranda", Bredasdorp	Building	
98800	36 Long Street	36 Long Street c/o All Saints Street, Bredasdorp	Building	
98801	23 Long Street c/o Fir Lane	23 Long Street c/o Fir Lane, Bredasdorp	Building	
98841	Dirkie Uys Street	Dirkie Uys Street c/o Independent Street, Bredasdorp	Place	
98847	25 Longs Street	25 Longs Street, Bredasdorp	Building	
98852	33 Long Street Rosedene	33 Long Street Rosedene, Bredasdorp	Building	
98855	1 Cross Street	1 Cross Street "Dowville", Bredasdorp	Building	
98857	35 Long Street	35 Long Street Bredasdorp	Building	
98858	3 Cross Street	3 Cross Street, Bredasdorp	Building	
98859	37 Long Street	37 Long Street, Bredasdorp	Building	
98860	5 Dirkie Uys Street	5 Dirkie Uys Street c/o Stanisen Street, Bredasdorp	Building	
98862	28 Long Street c/o Bank Street	28 Long Street c/o Bank Street, Bredasdorp	Building	
98867	7 Dirkie Uys Street	7 Dirkie Uys Street c/o Union Street, Bredasdorp	Building	
98868	28 Dirkie Uys Street	28 Dirkie Uys Street c/o All Saints Street, Bredasdorp	Building	
98876	4 Church Street c/o Van Riebeeck Street	4 Church Street c/o Van Riebeeck Street, Bredasdorp	Building	
98877	6 Selby Street	6 Selby Street c/o Lourens Street, Bredasdorp	Building	
98878	6 Church Street	6 Church Street, Bredasdorp	Building	
98880	8 Church Street Bredasdort Restaurant	8 Church Street Bredasdort Restaurant, Bredasdorp	Building	
98884	N.G. Kerk	N.G. Kerk, Church Street, Bredasdorp	Building	
98913	4 Van der Byl Street	4 Van der Byl Street, Bredasdorp	Building	

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98914	6 Van der Byl Street	6 Van der Byl Street, Bredasdorp	Building	
98917	25 - 27 Church Street	25 - 27 Church Street, Bredasdorp	Building	
98925	41 Church Street c/o All Saints Street	41 Church Street c/o All Saints Street, Bredasdorp	Building	
98927	12 Van der Byl Street	12 Van der Byl Street, c/o Hopley Street, Bredasdorp	Building	
98935	24 Van der Byl Street	24 Van der Byl street, Bredasdorp	Building	
98936	26 Van der Byl Street	26 Van Der Byl Street, Bredasdorp	Building	
98937	57 Church Street	57 Church Street, Bredasdorp	Building	
98946	42 Van der Byl Street	42 Van der Byl Street "Conneddie", Bredasdorp	Building	
98953	32 Church Street c/o All Saints Street	32 Church Street c/o All Saints Street Bredasdorp	Building	
98957	39 Van der Byl Street	39 Van der Byl Street, Bredasdorp	Building	
98968	43 Van der Byl Street	43 Van der Byl Street, Bredasdorp	Building	
98984	45 Van der Byl Street	45 Van der Byl Street, Bredasdorp	Building	
98986	53 Van der Byl Street	53 Van der Byl Street, Bredasdorp	Building	
98992	36 Church Street	36 Church Street, Bredasdorp	Building	
99003	55 Van der Byl Street	55 Van der Byl Street, Bredasdorp	Building	
99008	42 Church	42 Church, Bredasdorp	Building	
99015	59 Van der Byl Street	59 Van der Byl Street, c/o Plein Street, Bredasdorp	Building	
99018	3 Van der Byl Street	3 Van der Byl Street, Bredasdorp	Building	
99028	21 Hope Street	21 Hope Street, Bredasdorp	Building	
99034	35 Hope Street	35 Hope Street, Bredasdorp	Building	
99067	26 Hope Street	26 Hope Street, c/o All Saints Street, Bredasdorp	Building	
99082	28 Hope Street	28 Hope Street, Bredasdorp	Building	
99093	30 Hope Street	30 Hope Street, Bredasdorp	Building	
99121	32 Hope Street	32 Hope Street, Bredasdorp	Building	

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99131	34 Hope Street	34 Hope Street, Bredasdorp	Building	
99141	25 Smith Street	25 Smith Street, Bredasdorp	Building	
99151	29 Smith Street	29 Smith Street, c/o All Saints Street, Bredasdorp	Building	
99189	12 Smith Street	12 Smith Street, Bredasdorp	Building	
99195	14 Smith Street	14 Smith Street, Bredasdorp	Building	
99211	16 Smith Street	16 Smith Street, Bredasdorp	Building	
99220	18 Smith Street	18 Smith Street, Bredasdorp	Building	
99230	34 Smith Street	34 Smith Street, Bredasdorp	Building	
99233	20 Smith Street	20 Smith Street, Bredasdorp	Building	
99244	38 Smith Street	38 Smith Street, Bredasdorp	Building	
99247	22 Smith Street	22 Smith Street, Bredasdorp	Building	
99257	24 Smith Street	24 Smith Street, Bredasdorp	Building	
99260	4 Mathee Street c/o Van Riebeeck Street	4 Mathee Street c/o Van Riebeeck Street, Bredasdorp	Building	
99263	1 Nuwe Street	1 Nuwe Street, Bredasdorp	Building	
99265	17 Mathee Street at the back of 57	17 Mathee Street at the back of 57, Bredasdorp	Building	
99267	31 Mathee Street	31 Mathee Street, Bredasdorp	Building	
99270	3 Nuwe Street	3 Nuwe Street, Bredasdorp	Building	
99287	9 Lourens Street	9 Lourens Street, Bredasdorp	Building	
99297	14 Hopley Street	14 Hopley Street, Bredasdorp	Building	
99306	16 Hopley Street	16 Hopley Street, Bredasdorp	Building	
99307	Lourens Street	Lourens Street, Bredasdorp	Building	
99308	18 Hopley Street	18 Hopley Street, Bredasdorp	Building	
99316	20 Hopley Street	20 Hopley Street, Bredasdorp	Building	
99319	20 Reunie Street	20 Reunie Street, Bredasdorp	Building	

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99323	22 Hopley Street	22 Hopley Street, Bredasdorp	Building	
99329	All Saints Church, All Saints Street	All Saints Church, All Saints Street, Bredasdorp	Building	
99363	28 Fletcher Street	28 Fletcher Street, c/o Buitenkant Street, Bredasdorp	Building	
99423	29 - 31 Fletcher Street	29-31 Fletcher Street, c/o Buitenkant Street, Bredasdorp	Building	
99425	Police Station and Gaol, Hope Street	Police Station and Gaol, Hope Street, Bredasdorp	Building	
99513	Odenheim	"Odenheim", c/o Hopley and Hope Street, Bredasdorp	Building	
99524	All Saints Street c/o Long Street	All Saints Street c/o Long Street, Bredasdorp	Building	
99529	51 All Saints Street c/o Mathee Street	51 All Saints ,Street c/o Mathee Street, Bredasdorp	Building	
99534	Die Epistolisie Geloof Sending van Suid-Afrika	Die Epistolisie Geloof Sending van Suid-Afrika, Bredasdorp	Building	
99537	40 Long Street	40 Long Street, Bredasdorp	Building	
99542	49 Long Street	49 Long Street, Bredasdorp	Building	
99546	51 Long Street corner of Sealy Street	51 Long Street corner of Sealy Street, Bredasdorp	Building	
112406	3420CA_CC/FT/Struispunt 1	Fish Traps (Struispunt 1), Arniston Cape Agulhas	Archaeological, Intertidal	
112409	3420CA_CC/FT/Struispunt 2	Fish Traps (Struispunt 2), Arniston Cape Agulhas	Archaeological, Intertidal	
138874	9/2/013/0035	Former wine-cellar and slave quarters, Sarel Cilliers St, Napier	Structures	Grade II

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APPENDIX 2

Reference List from SAHRIS

NID	Author(s)	Date	Type	Title
3839	Royden Yates	01/03/1999	AIA Phase 1	Specialist Study on the Current Conservation Status of Archaeological Sites near Struispunt, Waenhuiskrans Nature Reserve
3840	Dave Halkett, Timothy Hart	01/07/1995	AIA Phase 1	Phase 1 Archaeological Investigation of a Portion of the Farm Zoetendals Vlei: Bredasdorp
3841	Dave Halkett, Timothy Hart	01/08/1998	AIA Phase 1	An Initial Historical Study of a Piece of Land Known as Portion 2 of Farm No.287, Bredasdorp
3843	Timothy Hart	01/01/2006	AIA Phase 1	Report on Sampling of a Prehistoric Silcrete Quarry at a Proposed Borrow Pit 55.3L Ptn 8 of Farm Zandvlakte No 250, Bredasdorp
3844	Jonathan Kaplan	30/06/1997	AIA Phase 1	Archaeological Study: Portion 7 of Dollas Downs 264, Arniston
3845	Christopher Henshilwood, Sarah Winter	01/05/2000	AIA Phase 1	Phase One Survey of Cultural Heritage Resources on Erven 34, 515 and Arniston Downs 260, Waenshuiskrans, Bredasdorp District
3847	Jonathan Kaplan	01/07/1997	AIA Phase 1	Archaeological Study Erfs 194, 195 & 196 Suiderstrand, Cape Agulhas
3849	Jonathan Kaplan	27/03/1999	AIA Phase 1	Archaeological Study Erf 193, Suiderstrand, Southern Cape Coast
3856	Jonathan Kaplan	01/02/2003	AIA Phase 1	Phase 1 Archaeological Impact Assessment of a Proposed Rest Camp Facility at Pietie Se Punt Agulhas National Park, Southern Cape
6216	Hilary Deacon	05/01/2009	AIA Phase 1	Archaeological Impact Assessment: Municipal Housing Project, Arniston
6653	Dave Halkett, Timothy Hart	01/08/1995	AIA Phase 1	Phase 1 Archaeological Investigation of Erven 940 and 922 Struisbaai, South West Cape Province
6659	Graham Avery, DM Avery	01/01/2004	AIA Phase 1	Survey for Archaeological Occurrences along Proposed New Eskom 66 kV Line between Bredasdorp and Struisbaai
7702	Jonathan Kaplan	06/07/2009	AIA Phase 1	Archaeological Impact Assessment: Proposed Subdivision of Portion 12 (A Portion of Portion 10) of the Farm Paapekuil Fontein No. 281 Cape Agulhas
7766	Jonathan Kaplan	03/03/2008	AIA Phase 1	Archaeological Assessment: Proposed Upgrading and Renovation of Rhenosterkop and Rietfontein Se Langhuis Heritage Buildings Agulhas National Park, Western Cape Province

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7821	Timothy Hart	01/01/2005	AIA Phase 1	Phase 1 Heritage Impact Assessment of Upgrading the Road from Gansbaai to Bredasdorp Western Cape Province
8004	Jonathan Kaplan	01/06/2008	AIA Phase 1	Phase 1 Archaeological Impact Assessment: Proposed Sewerage Scheme for Struisbaai & Cape Agulhas
8490	Timothy Hart	01/07/2004	HIA Phase 1	Heritage Impact Assessment of Portion 15 of Paapkuilfontein 28, Cape Agulhas, South Africa
8567	Peter Nilssen	20/08/2012		Paapenkuil Fontein Notes
9039	Lloyd Rossouw	01/04/2009	PIA Phase 1	Desktop Palaeontological Impact Assessment of a Proposed Dam Wall on the Klipdrift River near Napier, Western Cape Province
28357	John Almond	30/06/2008	PIA Desktop	Palaeontological Desktop Study For Bantamsklip (W. Cape) And Thyspunt (E. Cape) Reactor Sites
329719	Lita Webley	01/08/2011	AIA Phase 1	PROPOSED CONSTRUCTION OF A 771 M BOARDWALK FROM THE LIGHTHOUSE TO THE SOUTHERNMOST POINT, CAPE AGULHAS, AGULHAS NATIONAL PARK, WESTERN CAPE PROVINCE
329791	Quahnita Samie	27/06/2012	HIA Phase 1	Heritage Impact Assessment Bredasdorp Overberg District Municipality, Western Cape
356929	Phillip Hine	01/01/2008	Research Publication	STONE-WALLED TIDAL FISH TRAPS: AN ARCHAEOLOGICAL AND ARCHIVAL INVESTIGATION
502761			HIA	
502780	Liezl van Pletzen-Vos Renee Rust	31/05/2011	AIA	Phase 1 Archaeological Impact Assessment Report. Proposed 4.08ha extension of the Bredasdorp Cemetery, Cape Agulhas Local Municipality, Overberg District Municipality, Western Cape.
502786	Liezl van Pletzen-Vos Renee Rust	31/05/2011	AIA Phase 1	Phase 1 Archaeological Impact Assessment Report. Proposed Extension of the Napier Cemetery, Portion of Erf 513, Napier, Cape Agulhas Local Municipality, Overberg District Municipality, Western Cape.
	Raymond Smith	01/11/2013	Heritage Statement	Erf 342 (Lot 98, consolidated Erven 98 & 340) Taillard Street Arniston (Waenhuiskrans) Cape Agulhas Municipality
	Tim Hart Liesbet Schietecatte Natalie Kendrick	27/07/2017	AIA	Report on a renewed survey and trial excavations at the Cape Agulhas Light House Precinct, Agulhas National Park, Western Cape.

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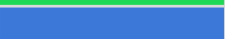
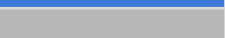

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APPENDIX 3 - Keys/Guides

Key/Guide to Acronyms

AIA	Archaeological Impact Assessment
DARD	Department of Agriculture and Rural Development (KwaZulu-Natal)
DEA	Department of Environmental Affairs (National)
DEADP	Department of Environmental Affairs and Development Planning (Western Cape)
DEDEAT	Department of Economic Development, Environmental Affairs and Tourism (Eastern Cape)
DEDECT	Department of Economic Development, Environment, Conservation and Tourism (North West)
DEDT	Department of Economic Development and Tourism (Mpumalanga)
DEDEA	Department of economic Development, Tourism and Environmental Affairs (Free State)
DENC	Department of Environment and Nature Conservation (Northern Cape)
DMR	Department of Mineral Resources (National)
GDARD	Gauteng Department of Agriculture and Rural Development (Gauteng)
HIA	Heritage Impact Assessment
LEDET	Department of Economic Development, Environment and Tourism (Limpopo)
MPRDA	Mineral and Petroleum Resources Development Act, no 28 of 2002
NEMA	National Environmental Management Act, no 107 of 1998
NHRA	National Heritage Resources Act, no 25 of 1999
PIA	Palaeontological Impact Assessment
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System
VIA	Visual Impact Assessment

Full guide to Palaeosensitivity Map legend

	RED:	VERY HIGH - field assessment and protocol for finds is required
	ORANGE/YELLOW:	HIGH - desktop study is required and based on the outcome of the desktop study, a field assessment is likely
	GREEN:	MODERATE - desktop study is required
	BLUE/PURPLE:	LOW - no palaeontological studies are required however a protocol for chance finds is required
	GREY:	INSIGNIFICANT/ZERO - no palaeontological studies are required
	WHITE/CLEAR:	UNKNOWN - these areas will require a minimum of a desktop study.

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APPENDIX 4 - Methodology

The Heritage Screener summarises the heritage impact assessments and studies previously undertaken within the area of the proposed development and its surroundings. Heritage resources identified in these reports are assessed by our team during the screening process.

The heritage resources will be described both in terms of **type**:

- Group 1: Archaeological, Underwater, Palaeontological and Geological sites, Meteorites, and Battlefields
- Group 2: Structures, Monuments and Memorials
- Group 3: Burial Grounds and Graves, Living Heritage, Sacred and Natural sites
- Group 4: Cultural Landscapes, Conservation Areas and Scenic routes

and **significance** (Grade I, II, IIIa, b or c, ungraded), as determined by the author of the original heritage impact assessment report or by formal grading and/or protection by the heritage authorities.

Sites identified and mapped during research projects will also be considered.

DETERMINATION OF THE EXTENT OF THE INCLUSION ZONE TO BE TAKEN INTO CONSIDERATION

The extent of the inclusion zone to be considered for the Heritage Screener will be determined by CTS based on:

- the size of the development,
- the number and outcome of previous surveys existing in the area
- the potential cumulative impact of the application.

The inclusion zone will be considered as the region within a maximum distance of 50 km from the boundary of the proposed development.

DETERMINATION OF THE PALAEONTOLOGICAL SENSITIVITY

The possible impact of the proposed development on palaeontological resources is gauged by:

- reviewing the fossil sensitivity maps available on the South African Heritage Resources Information System (SAHRIS)
- considering the nature of the proposed development
- when available, taking information provided by the applicant related to the geological background of the area into account

DETERMINATION OF THE COVERAGE RATING ASCRIBED TO A REPORT POLYGON

Each report assessed for the compilation of the Heritage Screener is colour-coded according to the level of coverage accomplished. The extent of the surveyed coverage is labeled in three categories, namely low, medium and high. In most instances the extent of the map corresponds to the extent of the development for which the specific report was undertaken.



Low coverage will be used for:

- desktop studies where no field assessment of the area was undertaken;
- reports where the sites are listed and described but no GPS coordinates were provided.
- older reports with GPS coordinates with low accuracy ratings;
- reports where the entire property was mapped, but only a small/limited area was surveyed.
- uploads on the National Inventory which are not properly mapped.

Medium coverage will be used for

- reports for which a field survey was undertaken but the area was not extensively covered. This may apply to instances where some impediments did not allow for full coverage such as thick vegetation, etc.
- reports for which the entire property was mapped, but only a specific area was surveyed thoroughly. This is differentiated from low ratings listed above when these surveys cover up to around 50% of the property.

High coverage will be used for

- reports where the area highlighted in the map was extensively surveyed as shown by the GPS track coordinates. This category will also apply to permit reports.

RECOMMENDATION GUIDE

The Heritage Screener includes a set of recommendations to the applicant based on whether an impact on heritage resources is anticipated. One of three possible recommendations is formulated:

(1) The heritage resources in the area proposed for development are sufficiently recorded - The surveys undertaken in the area adequately captured the heritage resources. There are no known sites which require mitigation or management plans. No further heritage work is recommended for the proposed development.

This recommendation is made when:

- enough work has been undertaken in the area
- it is the professional opinion of CTS that the area has already been assessed adequately from a heritage perspective for the type of development proposed

(2) The heritage resources and the area proposed for development are only partially recorded - The surveys undertaken in the area have not adequately captured the heritage resources and/or there are sites which require mitigation or management plans. Further specific heritage work is recommended for the proposed development.

This recommendation is made in instances in which there are already some studies undertaken in the area and/or in the adjacent area for the proposed development. Further studies in a limited HIA may include:

- improvement on some components of the heritage assessments already undertaken, for instance with a renewed field survey and/or with a specific specialist for the type of heritage resources expected in the area
- compilation of a report for a component of a heritage impact assessment not already undertaken in the area

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- undertaking mitigation measures requested in previous assessments/records of decision.

(3) The heritage resources within the area proposed for the development have not been adequately surveyed yet - Few or no surveys have been undertaken in the area proposed for development. A full Heritage Impact Assessment with a detailed field component is recommended for the proposed development.

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