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Our Ref.: 08/04/1197

HWC Ref.: HM/West Coast/Cederberg/Elands Bay/Elands Bay Baboon Point (Cape Deseada)  
PHS

30 April 2012

## BACKGROUND INFORMATION DOCUMENT

**APPLICATION FOR A PERMIT TO DEVELOP IN TERMS OF SECTION 27 OF THE NHRA FOR THE DEVELOPMENT OF FIVE RESIDENTIAL UNITS AND ONE INDUSTRIAL FACILITY ON THE REMAINDER OF ERF 65 AND ERF 66 AND PORTION 4 OF THE FARM VERLORENVLEI NO.8, ELANDS BAY IN ACCORDANCE WITH EXISTING LAND USE RIGHTS ASSOCIATED WITH THE ZONING OF THE PROPERTIES**

### 1. BACKGROUND AND INTRODUCTION

As a registered IAP for the previous application for the development of two residential development nodes on the above properties by Midnight Storm Investments 170 (Pty) Ltd. during early 2010, you will recall that both HWC and DEA&DP issued a negative Record of Decision for this application. As such the applicant, Midnight Storm Investments 170 (Pty) Ltd., elected not to pursue this development.

During the latter part of 2011, Midnight Storm Investments 170 (Pty) Ltd. launched an application for a permit in terms of Section 27 of the National Heritage Resources Act, 25 of 1999 (NHRA) from HWC to apply for the construction of a primary, secondary and consent use houses on their two agriculturally properties in accordance with their applicable agricultural zoning in terms of the Section 8 Scheme Regulations of the Land Use Planning Ordinance, 15 of 1985 (LUPO), namely:

- Two residential units (primary and secondary) on Portion 4 of Farm Verlorenvlei No. 8 in terms of its Agricultural Zone I zoning; and
- Three residential units (one primary and secondary and a third Consent Use unit in terms of the Section 8 Scheme Regulations of LUPO) in terms of its Agricultural Zone I zoning on Remainder of Farm 66.

In addition, Midnight Storm Investments 170 (Pty) Ltd. also wished to exercise its right to develop:

- One light industrial facility (warehouse, factory or similar) on Remainder of Erf 65 (the property enjoys an Industrial Zone I zoning). Refer to **Figure 1** for the proposed development.

Such a permit application to HWC is necessary for any development on privately owned property within a proclaimed Provincial Heritage Site, such as the Baboon Point Provincial Heritage Site.

Two meetings were held between HWC and Midnight Storm Investments 170 (Pty) Ltd. to discuss the above application. On 18 August 2011 HWC submitted a letter to Withers Environmental Consultants (who had submitted the permit application to HWC on behalf of Midnight Storm Investments 170 (Pty) Ltd.) which stated that they (HWC) would not process the development application as it was incomplete, namely:

- there had not been any consultation with IAPs;
- there were no plans showing the scale of units, massing or services;
- no plans showing the relationship between landscape and the proposed development and no visual impact assessment;
- there was no assessment of the impacts on archaeological or palaeontological sites or mitigation;
- there was no plan for heritage or visual mitigation;

amongst others.

As such, HWC suggested that the application should be resubmitted to them with the required information, as outlined above.

In providing the above information, three specialists were appointed by Midnight Storm Investments 170 (Pty) Ltd. to consider the proposed development in terms of the current land use zonings of their properties, namely:

- (i) Agency for Cultural Resource Management (ACRM): who produced a report entitled: *Archaeological Impact Assessment: Proposed Development of Five Residential Units and One Industrial Facility on Erf 65, Remainder of Erf 66, and Portion 4 of Farm Verlorenvlei No. 8, Elands Bay, Western Cape (February 2012).*
- (ii) ARCON Architects & Heritage Consultants: who produced a report entitled: *Baboon Point Erven 65, 66 & Ptn 4 of Verlorenvlei Farm No 8, Elands Bay: Draft Supplementary Heritage Impact Assessment Stage 2 (March 2012).*
- (iii) JB Architecture, Architectural Services and Design, who produced a single plan of the proposed farm houses to be built on these properties and showed how these houses spatially fitted into the surrounding environment from different vantage points by way of 3D photomontages. A plan and photomontages of an industrial building on Erf 65 was also provided, namely: *Development on Remainder of Erf 65 and 66, Elands Bay*

The potential impacts of the construction of houses and the industrial building on the properties belonging to Midnight Storm Investments 170 (Pty) Ltd. has been assessed by the above authors. Their results are summarised below.

## **2. RESULTS OF THE SPECIALIST REPORTS**

### **2.1 Archaeological Impact Assessment**

ACRM has been instructed to undertake a baseline study in order to identify archaeological sites or remains that may be impacted by the new development proposal, to assess the significance of the potential impacts and to propose measures to mitigate any impacts. Acknowledging the archaeological sensitivity of Baboon Point, the archaeologist was specifically requested to identify potential footprint areas where the proposed construction of the residential units could possibly take place. The full extent of the affected properties was not searched as this had already been undertaken by the archaeologist and others for the previous larger nodal development.

The footprint area for each residential dwelling will be between 450-500 m<sup>2</sup>. Access roads and parking areas will amount to an additional ± 500 m<sup>2</sup>. Water pipelines and electrical power cables will be laid underground. Conservancy tanks, or septic tanks or soak-aways for each unit will also be required.

The footprint area for the industrial facility will be about 1000 m<sup>2</sup>.

### 2.1.1 Portion 4 of the Farm Verlorenvlei No. 8

Archaeological deposits occur over most of the proposed footprint area below the gravel road, where a single residential unit (Unit 5) is proposed. Extensive shellfish deposits on the dune tops and in the back dune area most likely comprise the southern extent of the well-known Cape Deseada Midden (CDM), which dates to between 3000 and 2000 years ago. The presence of several potsherds found on the surface indicates that the site was also used after 2000 years ago. The slopes immediately below the gravel road also contain shellfish deposits and stone flakes, but these remains are more thinly dispersed and sporadic. There are also larger open areas of loose windblown sands below the gravel road, where very little/no surface archaeological remains were found.

Given the proposed size of the footprint area of Unit 5, the probability is very high that archaeological deposits will be severely impacted by proposed construction activities. The archaeologist therefore does not support any **development below the gravel road**, as this **will have a High negative impact on archaeological deposits** (CDM) that have been rated as having high local (Grade 2 Provincial Heritage Site) significance. Any development below the gravel road is far too sensitive and alternative housing sites above the road should rather be investigated.

Archaeological remains above the road are very thinly dispersed across the landscape, and include fragments of shellfish and a few stone flakes. Barely, visible scatters of shellfish occur directly alongside the road on soft loose sands. A compelling scatter of shellfish and a relatively large number of stone flakes were recorded among a cluster of sandstone boulders on the upper sandy slopes, about 50-60 m from the gravel road. It is possible that one unit (i.e. Unit 4) or **two units, with a much smaller footprint area could be built above the road**. The impact of one or two units on surface archaeological remains is likely to be low, but potentially negative impacts on sub-surface archaeological deposits may, however, still occur.

### 2.1.2 Erf 66

Three residential units are proposed on Erf 66. Unit 1 is located alongside the gravel road, close to Elands Bay South, while Units 2 and 3 are located above the gravel road within the southwestern corner of Erf 66. Hailstorm Midden is located on Erf 66 near Elands Bay South and has been radiocarbon dated to about 900 years BP. The extent of the midden has been mapped by the archaeologist during a previous survey, and a proposed 10 m no development buffer zone was recommended around this midden.

An intensive survey of the proposed development area has shown that fairly substantial volumes of shellfish deposits occur on the mid and upper slopes of the property, including stone artefacts (in quartz, silcrete, indurated shale and quartzite) and ostrich eggshell fragments. Fourteen pieces of pottery (including one decorated sherd) was also found. Potential sites (for a single dwelling) were identified on the lower slopes alongside the gravel road, where surface shellfish is sporadic, as well as being absent in places.

A single dwelling (with a footprint area of perhaps 300-350 m<sup>2</sup>) alongside the gravel road, if sensitively positioned, will not have a significant impact on surface archaeological deposits, but may impact on sub-surface material. Unmarked human burials may also be exposed during bulk earthworks and excavations.

A real concern is, however, that further damage to sensitive archaeological deposits on the higher slopes of Erf 66, including the very important Hailstorm Midden, could occur as a result of more people walking over the property, and collecting tools and artefacts.

Archaeological deposits including marine shellfish and a low density scatter of LSA tools, including one Middle Stone Age flake were encountered during a wide search of the proposed site of the other two units (Units 2 and 3) within the southwestern sector of Erf 66.

This area is partially disturbed by the excavation of several large pits. More visible scatters of shellfish occur alongside the gravel road, but these are still very thin and patchy. Scatters of shellfish (limpets and black mussel) and LSA tools were recorded among a cluster of sandstone boulders on the upper slopes of the property.

The assessment has shown that the proposed construction of **Units 2 and 3 in Erf 66 will not have a significant impact on surface archaeological remains**, but construction activities may impact negatively on potentially important sub-surface deposits.

### 2.1.3 Erf 65

The proposed industrial facility (either a warehouse or factory) will be located within a footprint area that is already severely degraded and transformed. The intention is to build a facility alongside the gravel road (adjacent to the Eilandia crayfish factory), in an area that is covered in large piles of building rubble, rocks, stone and debris.

Shell midden and fossil shell/raised beach deposits occur alongside the gravel road and a portion of CDM also intrudes into Erf 65. A lens of shell has been documented by archaeologists in the compound rubbish tip indicating that there is archaeological material in a subsurface context.

The remains of several ruined buildings that were built before 1948 and later used by migrant labourers between the 1960s and 1980s also occur on the property. There are foundations, open pits and septic tanks that indicate that the buildings covered a large portion of the property. The remaining structures/features on the site are of heritage significance even though they have been damaged and vandalized. The study has shown that despite the degraded nature of the receiving environment, construction of **a light industrial facility on Erf 65 will likely impact on sub-surface archaeological deposits**.

### 2.1.3 Conclusions and Recommendations

While care has been taken to identify potential sites for development, the proposed construction of five residential dwellings and a light industrial facility will have a negative impact on the immediate and surrounding archaeological landscape, during both the construction phase, as well as the long term operational phase of the development, where indirect impacts are likely to occur.

The proposed footprint area for the residential units should be reduced from  $\pm 500 \text{ m}^2$  to  $\pm 350 \text{ m}^2$ , including the stoep area. Reducing the size of the building footprint will impact less on potentially sensitive sub-surface archaeological deposits.

The residential units should be placed as close as possible to existing gravel roads.

Sampling and dating, by way of test excavations of archaeological deposits in the proposed footprint areas must be undertaken prior to any construction activities commencing.

Monitoring of bulk earthworks (including excavations for all services) must be carried out by a professional archaeologist.

## 2.2 Draft Supplementary Heritage Impact Assessment

### 2.2.1 Introduction

ARCON Architects and & Heritage Consultants was appointed by Midnight Storm Investments 170 (Pty) Ltd. to assess the Heritage Impacts of the proposed development of primary and secondary dwelling units on their properties in terms of their agricultural zoning and a small industrial/warehouse building on Erf 65 in terms of its industrial zoning.

Given the multi-faceted and dynamic interpretation of cultural significance with the passing of time and constantly changing values and interest groups, it is not possible to make a definitive statement of heritage significance. This HIA nevertheless seeks to obtain as clear an idea of heritage resources within the study area as is practically possible, informed by the Provincial Heritage Site (PHS) nomination and the archaeological impact assessment.

The brief of this HIA is primarily to fulfil the statutory requirements of Section 27 (Provincial Heritage Sites) of the NHRA. Section 38(8) of the NHRA (heritage impact assessment forming part of an EIA) is no longer applicable as the current proposals now fall within the Provincial Heritage Site area. However, NHRA Section 27 still covers those aspects otherwise addressed in terms of NHRA Section 34 (structures older than 60 years); Section 35 (archaeology and palaeontology); Section 36 (burial grounds and graves) and Section 38 (Heritage Impact Assessments), i.e. where heritage resources are not located within a Provincial Heritage Site.

The current development proposals are measured against the recommendations and heritage-related design informants. This supplementary Stage 2 draft report will be finalized only after relevant comments from interested and affected parties have been addressed and, where necessary, taken into account.

This HIA report supports the principle of developing limited portions of Baboon Point for residential and industrial purposes, while ensuring that such development remains sensitive to the spatial character of the property and its highly significant archaeological and botanical resources. Unfortunately, there is, as yet, still no adequate Conservation Management Plan to provide guidance for future development within the Baboon Point PHS.

Support for the principle of developing some form of low key residential development on the Remainder of Erf 66 and Portion 4 of the Farm Verlorenvlei No. 8 and a portion of Erf 65 for industrial purposes, is based solely on recognizing, in the absence of a suitable alternative agreement with HWC, that these properties *have valid development expectations based on their valid agricultural and industrial zonings*.

It should be noted that given that the zonings of the property permit limited development, the “No-Development Alternative” cannot be exercised without it impacting negatively on the owner’s land use rights as entrenched in Section 25 of the Constitution, thereby theoretically giving rise to a claim for compensation.

### **2.2.2 Key Heritage Priorities for New Development**

These priorities fundamentally underpin the Design Informants for future development as set out below:

- Ensuring development that has appropriate densities and a scale responding directly to the spatial and topographical characteristics, of what is a semi-wilderness landscape;
- Introducing architecture that is informed directly by the exposed, open nature of the surrounding landscape, vegetation, land forms, micro-climatic conditions and natural colours, rather than by stylistically-driven informants per se;
- Integrating landscaping and architectural patterns, with particular attention to roof canopies, wall colours and textures, choice and placement of vegetation, road surfacing, placement of cut and fill (where at all acceptable), as well as nature and location of services;
- Introducing new development that strengthens or consolidates existing signature alignments, gateway spaces and axial relationships in the vicinity of the fish factory;
- Recognising the importance of balancing existing development rights with a need to act responsibly in introducing new development into an area of at least great regional cultural significance; and

- Introducing development that avoids, or at least minimizes disruption to archaeological and botanically noteworthy sites.

### 2.2.3 Assessment Structure and Approach

This assessment is structured to meet the requirements of Section 38 (heritage impact assessments) of the NHRA, although it is prepared in accordance with Section 27 (Provincial Heritage Sites) of the NHRA, and addresses the following criteria for assessing heritage impacts:

- Nature of Impact;
- Measurement & Duration of Impacts;
- Significance of Impacts (unmitigated);
- Significance of Impacts (mitigation); and
- Confidence of Assessment.

### 2.2.4 Heritage Assessments for Key Site Related Impacts

#### 2.2.4.1 Site 1 (Remainder of Erf 66)

This residential site is the least contentious of the proposed development areas in the sense that it is furthest from the Bobbejaansberg headland and closest to existing suburban development.

The proposed residence may, however, exceed the maximum (300 – 350 m<sup>2</sup>) footprint size recommended in the AIA. Provided that the maximum recommended development footprint is not exceeded, impacts relating to this site are rated *Low to Medium*.

Photomontages prepared as part of the previous development proposals for the then Site A, located in the same area as this site, have already illustrated that even a cluster of dwellings in this location would not have a major visual impact on the surrounding area with mitigation. Strangely, the single large dwelling now proposed for this area appears oddly overwhelmed by the wider, largely open setting (**Figure 2**). As a single dwelling in this area, it is also anomalous in relation to the residential cluster on the opposite side of the Baboon Point approach road.

#### 2.2.4.2 Sites 2, 3, 4 & 5 (Remainder of Erf 66 & Portion 4 of Farm No. 8, respectively)

##### Sites 2-4

These four residential sites (with Site 5), are situated within one of the most contentious portions of the property. In fact the Stage 1 HIA design informants undertaken for the previous nodal development indicated that Sites 2, 3, and 4 *would be within no-go areas for future development*. Impacts relating to these sites are rated *High to Very High*. Consequently, this study re-iterates that no new development should be considered on these sites.

High impacts are partly because the area is identified as having high botanical significance, and because the area falls within the most remote part of the property, with the exception of the Bobbejaansberg summit. It was concerns around potential impacts on the remote qualities of the southern parts of Baboon Point, and negative impacts on the viewshed from Elands Bay Cave, that initially caused the developers to put on hold their earlier development proposals for this area. The sensitivity of this area is effectively summarised in a joint statement prepared by archaeologists and academics during a forum for providing input into the Conservation Management Plan for Baboon Point PHS. Part of this statement reads as follows:

*“Eland’s Bay Cave has a vista down south - undeveloped/unpopulated. This contributes significantly to the place as it allows visitors to connect to the past. It is important to recall the historic sea view, the vista of Baboon Point as viewed by the early Portuguese explorers. There is a sense of remoteness, no significant made-made structures are visible from Eland’s Bay Cave except for the abandoned radar station. The quietness and sense of desolation contributes a powerful sense of history.”* (Draft CMP, p.22).

This vista will clearly be affected by these development proposals. The proposed development footprint for each site is 450-500 sq m.

#### **Site 5**

Development on this site is considered unacceptable because of potentially high archaeological impacts on the Cape Deseada megamidden, as well as for reasons of spatial impact as referred to above. Archaeological impacts relating to this site are rated *Very High*. Consequently, this study re-iterates that no new development be considered on this site.

#### **2.2.4.3 Site 6 (Remainder of Erf 65)**

Development on this site is considered to be at least potentially problematic with regard to spatial impacts on views mainly from the remote southern parts of the property (**Figure 3**). In addition, views from Elands Bay Cave would also be affected, albeit not to a major degree. Impacts relating to this site are rated *Medium to High*, but could possibly be mitigated to *Medium* levels.

The proposed development on this site is in accordance with its Industrial 1 zoning, and therefore in accordance with the property owner’s development rights.

The AIA makes no recommendation either for or against development on this site.

The abovementioned factors indicate this site as being the one around which most negotiation will need to take place between the developers and HWC concerning the nature of any new development on Midnight Storm’s properties.

To exercise their Industrial Zone 1 development rights for the property, the owners propose constructing a relatively substantial (1000 m<sup>2</sup>) new industrial building on this property. Given that this portion of the property has been associated historically with the fishing industry, and given that Erf 65 has, in the past, been developed as an industrial labour compound (now demolished), the landowner’s proposals present, at least in principle, a strong case for at least some substantial development. As the draft CMP points out (Section 7.2 p74), an application for re-use of this site for activities related to fishing would be *“more sympathetic with the history and established use and identity of the area”* (although compared to what, is not clear). However, the draft CMP goes on to suggest that given the high value placed by the findings of the MEC’s tribunal on the spatial context and aesthetic qualities of the area, *any* development activity that would fundamentally change the appearance of the place would be considered undesirable.

Should HWC agree with the view expressed in the draft CMP that new development on the site would indeed be undesirable to the point of being unacceptable, the fundamental issue of valid industrial development rights for Erf 65 would have to be addressed.

#### **2.2.4.4 Landscaping Impacts in General**

Landscaping impacts related to the proposed industrial development on Erf 65, where impacts from security fencing and lighting, could be *High* without mitigation.

No specific landscape plans have been developed for the proposed development at this stage, although the development proposals prepared by JB Architecture illustrate the landscaping design intent clearly.

The landscaping impacts associated with the residential werfs are rated to be *Low to Medium*.

#### **2.2.4.5 Architectural Impacts**

The architectural proposals are generally in line with the 2009 Architectural (and Landscape) Draft Guideline put forward for the previous nodal development proposed by Midnight Storm Investments 170 (Pty) Ltd., apart from certain specific aspects. These aspects relate to the proposed industrial development on Erf 65, where possible impacts relating to architectural scale, massing, and architectural integration with the landscape are rated *Medium to High (Figure 3)*. All other architectural impacts (residential in particular) are rated *Low to Medium (Figure 2)*

The assessment of architectural impacts is informed by the guidelines prepared for the previous 2009 development proposals. Architectural impacts on Sites 2-5 are not assessed, given that these sites have been screened out from further consideration due to their unacceptably high spatial and archaeological impacts.

#### **2.2.4.6 Impacts Measured Against Socio-Economic Benefits**

This issue is not addressed further, given that the Provincial Tribunal's response to the previous 2009 application was that no substantial evidence existed that the development, as then proposed, would result in socio-economic benefits. In the absence of further evidence supporting socio-economic benefits, it nonetheless follows that the current proposals, being significantly smaller than the 2009 proposals, would result in a considerably lower probability of socio-economic benefits.

### **2.2.5 Conclusions**

2.2.5.1 The cumulative impacts for the site are measured against their conformity with the Key Design Informant Priorities as already endorsed by HWC (as set out in Section 8.2. of the Stage 1 HIA report of June 2007).

2.2.5.2 Sites 2-5 are not considered, given that they have been screened out from further evaluation due to their unacceptably high heritage impacts, and being located within development No-Go areas as identified in the previous Stage 1 HIA Design Informants.

2.2.5.3 Only a few sites within the Baboon Point Provincial Heritage Site are considered viable for Development in terms of the property's heritage-related constraints, namely Sites 1 and 6. The exclusion of Sites 2-5 means that the property owner, Midnight Storm, will not be able to exercise full development rights for Erf 66 (Sites 2 & 3 excluded), and will not be able to exercise any development rights for Ptn 4 of Farm Verlorenvlei No 8 (Sites 4 & 5 excluded), unless a suitable alternative arrangement can be reached between the owner and HWC.

2.2.5.4 If HWC concurs with this conclusion, a number of possible alternatives present themselves in order for the owner to be able to exercise its relevant development rights, namely:

- i) Permitting further development on Erf 66, i.e. in addition to, and probably in the vicinity of Site 1 (subject to archaeological expert endorsement);
- ii) Permitting further development on Erf 65 – not necessarily of an industrial nature. This may however require a rezoning;

- iii) Entering into a land swap with the Province Government for alternative land elsewhere; or
- iv) Entering into an agreement with HWC and the local authority for the acquisition of at least part of the adjacent fish factory property with a view to its modest redevelopment, given that two of these factories are understood to be currently standing vacant (still to be confirmed).

2.2.5.5 Given that there is a strong opinion within certain quarters that no development on Erf 65 should take place, this would place even stronger pressure on arriving at a solution acceptable to both HWC and the landowner. Apart from the alternatives suggested above, the only other likely scenario would be a claim for monetary compensation instituted by the landowner, which HWC by its own admission, is most probably not in a position to meet.

2.2.5.6 The industrial development rights attached to Erf 65 are a reality that cannot be ignored without having to address the issue of compensation for the owners, should they be prevented from exercising these rights. Even if funds were to be made available for supporting a no-development option at Baboon Point, there would still be no guarantee that the proper controls would be put in place to prevent further damage to its heritage resources. Given these factors, controlled development on the property is considered preferable to persisting with the status quo.

2.2.5.7 Taking all of the preceding factors into account, the overall conclusion of the Heritage report is, therefore, that the proposed developments on Sites 1 & 6, as indicated in the architectural drawings and photomontages: Sheets B01-B32. 24 February 2012 could, with appropriate mitigation, be kept within acceptable (moderate) limits of change.

### **2.3 Architectural Informants to the Proposed Development**

JB Architecture Architectural Services and Design have provided one floor plan design (total coverage of each unit is 542 m<sup>2</sup>, including the open patio floor area) of a house to be developed on the two agricultural properties owned by Midnight Storm Investments 170 (Pty) Ltd. and one industrial building (total floor area of 1 000 m<sup>2</sup>) to be sited on Erf 65. 3-D models of this one house design are placed into the landscape of the sites by “dropping” them into photomontages taken from different viewsheds of the properties (**Figure 2**). The same technique is used for the proposed industrial building on Erf 65 (**Figure 3**).

## **3. PUBLIC PARTICIPATION PROCESS**

A public participation process for the Permit application to HWC is being conducted to obtain written comments of the proposed development of Erven 65 and 66 and Portion 4 of Farm No. 8, Elands Bay from interested and affected parties (IAPs) that registered for the previous development proposals of these properties.

Copies of this BID have been sent (post and email) to all previously registered IAPs. Copies of the specialist reports and the architectural designs can be viewed on Withers Environmental Consultant’s website: [www.withersenviro.co.za](http://www.withersenviro.co.za).

**IAPs are requested to provide written comment to Withers Environmental Consultants at the contact details given on page 1 by 4 June 2012.**

**A.W. WITHERS  
WITHERS ENVIRONMENTAL CONSULTANTS**



Google Image Showing the Localities of Houses in terms of the Agricultural Zoning of the Portion 4 of Farm 8 and Erf 66 and the Industrial Development on Erf 65, Elands Bay.

FIGURE 1



**Figure 2:** Photomontage of Unit 1 on the northeast corner of Erf 66.



**Figure 3:** The proposed factory building on Erf 65 with Bobbejaansberg in the background.