



SOUTH AFRICAN HERITAGE RESOURCES AGENCY
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FOR ATTENTION: **PHRA: Northern Cape**

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SAHRA File No: **9/2/025/0001**
 Date Received: **1 December 2011**
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 Sent to Peer Review:
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 SAHRA Contact Person: **Dr Mariagrazia Galimberti**
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REVIEW COMMENT ON ARCHAEOLOGICAL IMPACT ASSESSMENT

BY THE ARCHAEOLOGY, PALAEOLOGY AND METEORITES UNIT OF THE SOUTH AFRICAN HERITAGE RESOURCES AGENCY

South Africa has a unique and non-renewable archaeological and palaeontological heritage. Archaeological and palaeontological sites are protected in terms of the National Heritage Resources Act (Act No 25 of 1999) and may not be disturbed without a permit. Archaeological Impact Assessments (AIAs) and Palaeontological Impact Assessments (PIAs) identify and assess the significance of the sites, assess the potential impact of developments upon such sites, and make recommendations concerning mitigation and management of these sites. On the basis of satisfactory specialist reports SAHRA or the relevant heritage resources agency can assess whether or not it has objection to a development and indicate the conditions upon which such development might proceed and assess whether or not to issue permission to destroy such sites.

AIAs and PIAs often form part of the heritage component of an Environmental Impact Assessment or Environmental Management Plan. They may also form part of a Heritage Impact Assessment called for in terms of section 38 of the National Heritage Resources Act, Act No. 25, 1999. They may have other origins. In any event they should comply with basic minimum standards of reporting as indicated in SAHRA Regulations and Guidelines.

This form provides review comment from the Archaeologist of the relevant heritage resources authority for use by Heritage Managers, for example, when informing authorities that have applied to SAHRA for comment and for inclusion in documentation sent to environmental authorities. It may be used in conjunction with Form B, which provides relevant peer review comment.

- A. PROVINCIAL HERITAGE RESOURCES AUTHORITY: **Northern Cape**
- B. AUTHOR OF REPORT: **Mr Jaco van der Walt**
- C. ARCHAEOLOGY CONTRACT GROUP: **Heritage Contracts and Archaeological Consulting**
- D. CONTACT DETAILS: **Tel: 082 373 8491, email: jaco.heritage@gmail.com**
- E. DATE OF REPORT: **15 November 2011**
- F. TITLE OF REPORT: **AIA for the Proposed establishment of the Inca Solar Energy Facility, De Aar, Northern Cape**
- G. Please circle as relevant: Archaeological component of **EIA** / EMP / HIA / CMP/
Other (Specify)
- H. REPORT COMMISSIONED BY (**CONSULTANT** OR DEVELOPERS): **Savannah Environmental (Pty) Ltd,**
- I. CONTACT DETAILS: **PO Box 148, Sunninghill, 2157. Ms Alicia Govender: alicia@savannahsa.com**
- J. COMMENTS:

Please see comment on next page

REVIEW COMMENT ON ARCHAEOLOGICAL IMPACT ASSESSMENT

Mr Jaco van der Walt

Dated: November 2011, Received: December 2011

AIA for the Proposed establishment of the Inca Solar Energy Facility, De Aar, Northern Cape

INTRODUCTION

INCA De Aar solar (Pty) Ltd is proposing the development of a 30MW PV power plant about 8km southeast of De Aar. The footprint of the development will be 60ha, with the entire area earmarked for the development being 213ha. The facility will include, besides the PV panels, a substation of 50x30m, a 132kV power line of about 1.6km, with a servitude of 30m, connecting the facility to the Eskom Hydra-Britsville 132kV power line, underground cabling, where possible, and access roads with a 4m width.

A heritage scoping report had already been undertaken during the Scoping phase by Dr van Schalkwyk. SAHRA's comments on the report requested a Phase 1 archaeological impact assessment for the environmental impact assessment report phase, but stated that the palaeontological significance of the site is considered low since the area is underlain with Quaternary alluvial sand and Jurassic dolerite. Therefore, a palaeontological impact assessment was not considered necessary.

The archaeologist undertook a survey by foot and by car and covered extensively the properties taken into consideration.

DISCUSSION

The archaeologist focussed his survey on sections of the terrain where archaeological resources are most likely located, such as dolerite hills and disturbance in the terrain.

The deep Quaternary sand did at times hamper visibility of the surface which therefore it meant that archaeological resources, especially unmarked graves, may still be identified during construction.

The archaeologist recorded four sites during his survey: two of them are old farm dwellings, one of which is associated with a one-grave cemetery, whereas the other two are Middle Stone Age sites.

The two historical sites may or may not be older than 60 years, and therefore be protected by the National Heritage Resources Act. Most likely Site 3, a dilapidated workers' cottage is younger than that. One grave is located close to Site 1, however it is expected that the development will not impact on it since, according to the sensitivity map in the Draft Environmental Impact Assessment (p. viii), the development will exclude all these sites.

The two middle Stone Age sites are open sites consisting of artefacts made of hornfels, located in the south of the development area, close to the dolerite hills. Both sites were identified as workshop sites in Table 6.3.2 of the report, however this is in contradiction with the Impact Evaluation and the Recommendations of the report. Therefore, SAHRA came to the conclusion that these are indeed scatters and no recommendations for workshop sites will be requested. The author states that the entire dolerite hill is scattered with similar artefacts and the sites identified as 2 and 4 are simply a higher concentration of artefacts with very low significance.

SAHRA RECOMMENDATIONS

SAHRA APM unit recommends that:

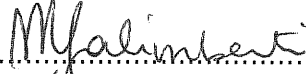
- Decisions on Built Environment (e.g. structures over 60 years, such as possibly sites 1 and 3, if impacted) must be made by Provincial Heritage Resources Authority of the Northern Cape (Mr. Joas Sinthumule, jsinthumule@ncpg.gov.za) to whom this Archaeological Review Comment will be copied.
- The grave site is already fenced off, however no development is allowed within 20m from its fence.

- Since sites 2 and 4 are believed not to be workshop sites and of being of low significance, no further recommendations are required for these two sites.

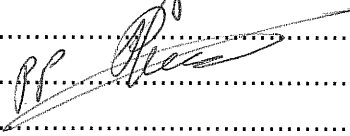
CONCLUSION

If the recommendations in this comment are adhered to, the SAHRA Archaeology, Palaeontology and Meteorites Unit has no objection to the development.

If any new evidence of archaeological sites or artefacts, palaeontological fossils, graves or other heritage resources are found during development or construction, SAHRA (Mariagrazia Galimberti, Colette Scheermeyer, Tel: 021 462 4502) and a professional archaeologist or palaeontologist, according to the finding, must be alerted immediately. A Phase 2 Impact Assessment may be necessary at the cost of the developer.

SIGNATURE OF ARCHAEOLOGIST PROCESSING REPORT: 

EMAIL: mgalimberti@sahra.org.za

SIGNATURE OF SAHRA HEAD ARCHAEOLOGIST: 

EMAIL: cscheermeyer@sahra.org.za

NAME OF HERITAGE RESOURCES AGENCY: SAHRA

PLEASE NOTE THAT THE COMMENT (ABOVE OR APPENDED) CONSTITUTES THE COMMENT OF THE HERITAGE RESOURCES AGENCY ARCHAEOLOGIST AND THAT ANY DEVELOPMENT THAT INVOLVES DESTRUCTION OF ANY ARCHAEOLOGICAL/PALAEONTOLOGICAL SITE IS STILL SUBJECT TO A PERMIT/PERMISSION FOR DESTRUCTION OF SUCH SITE GIVEN TO THE DEVELOPER BY THE RELEVANT HERITAGE RESOURCES AGENCY ARCHAEOLOGICAL AND PALAEONTOLOGICAL PERMIT COMMITTEE (THIS WILL BE SUBJECT TO APPROVAL OF THE PHASE 2 OR ARCHAEOLOGICAL/ PALAEONTOLOGICAL MITIGATION AS NECESSARY). THIS REPORT MAY BE TAKEN ONLY AS APPROVAL IN TERMS OF SECTION 35 OF THE NATIONAL HERITAGE RESOURCES ACT. THE PROVINCIAL MANAGER OF THE HERITAGE RESOURCES AUTHORITY MUST ADVISE AS TO APPROVAL IN TERMS OF HERITAGE ISSUES ENCOMPASSED BY OTHER ASPECTS OF THE LEGISLATION, SUCH AS ISSUES OF THE BUILT ENVIRONMENT (STRUCTURES (E.G. FARM HOUSES), OVER 60 YEARS), INDIGENOUS KNOWLEDGE SYSTEMS OR OF CULTURAL LANDSCAPES AS THIS IS NOT WITHIN THE SCOPE OF THE ARCHAEOLOGIST.

PLEASE NOTE THAT SAHRA IS NOW RESPONSIBLE FOR GRADE I HERITAGE RESOURCES (AND EXPORT) AND THE PROVINCIAL HERITAGE RESOURCES ARE RESPONSIBLE FOR GRADE II AND GRADE III HERITAGE RESOURCES, EXCEPT WHERE THERE IS AN AGENCY ARRANGEMENT WITH THE PROVINCIAL HERITAGE RESOURCES AUTHORITY.

