



SOUTH AFRICAN HERITAGE RESOURCES AGENCY  
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FOR ATTENTION: **SAHRA Eastern Cape** and **PHRA: Eastern Cape**

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SAHRA File No: **9/2/073/0001**  
Date Received: **11.03.2010**  
Date of Comment: **29.03.2010**  
Sent to Peer Review: .....  
Date to Peer Review: .....  
SAHRA Contact Person: **Mariagrazia Galimberti**  
DME Ref No:

## REVIEW COMMENT ON ARCHAEOLOGICAL IMPACT ASSESSMENT

BY ARCHAEOLOGY/ PALAEOLOGY UNIT OF THE 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: **Eastern Cape** .....
- B. SAHRA PROVINCIAL MANAGER : **Mr Thanduxolo Lungile**.....
- C. AUTHOR(S) OF REPORT: **Dr Johan Binneman and Ms Celeste Booth**
- D. ARCHAEOLOGY CONTRACT GROUP: **Department of Archaeology**
- E. CONTACT DETAILS: **Albany Museum, Somerset St, Grahamstown, 6139.**  
**jbinneman@ru.ac.za, celeste.booth@ru.ac.za**
- F. DATE OF REPORT: **February 2010**
- G. TITLE OF REPORT: **A phase 1 Archaeological Impact Assessment (AIA) for the proposed 20MW wind farm on three alternative sites: Erf 121, Driftsands (Site Alternative 1), Bushy Park Farm, Remainder of Erf 26, as well as portions 5, 6 and 7 thereof (Site Alternative 2) and Rietfontein Farm, Erf 594, Van Stadens East (Site Alternative 3),. Nelson Mandela Metropolitan Municipality, Port Elizabeth, Eastern Cape Province.**
- H. Please circle as relevant: Archaeological component of **EIA** / EMP / HIA / CMP  
Other (Specify) .....
- I. REPORT COMMISSIONED BY (CONSULTANT OR DEVELOPER): **SRK CONSULTING**
- J. CONTACT DETAILS: **Ms Nicola Rump, PO Box 21482, Port Elizabeth, 6001,**

**tel: 041 509 4800, email: portelizabeth@srk.co.za**

**K. COMMENTS:** .....

*Please see comment on next page* .....

## REVIEW COMMENT ON ARCHAEOLOGICAL IMPACT ASSESSMENT

Dr J. Binneman and Ms C. Booth

Date of the report: February 2010, Comments: March 2010

**A phase 1 Archaeological Impact Assessment (AIA) for the proposed 20MW wind farm on three alternative sites: Erf 121, Driftsands (Site Alternative 1), Bushy Park Farm, Remainder of Erf 26, as well as portions 5, 6 and 7 thereof (Site Alternative 2) and Rietfontein Farm, Erf 594, Van Stadens East (Site Alternative 3), Nelson Mandela Metropolitan Municipality, Port Elizabeth, Eastern Cape Province.**

### INTRODUCTION

The abovementioned project is planning to develop a 20 Medium Voltage wind farm composed of ten wind turbines in the Nelson Mandela Municipality. Besides turbines, a series of infrastructures will also need to be put in place, increasing the extension of the impacted area. Three alternative sites are proposed, if Site 3 is chosen, it will be probably necessary to build a new substation as it is located too far from the existent ones.

All three sites were investigated during a Phase 1 AIA:

- site alternative 1: Erf 121, Driftsands;
- site alternative 2: Bushy Park Farm (Remainder of Erf 126, portions 5, 6, 7 and thereof);
- site alternative 3: Rietfontein Farm, Erf 594, van Stadens East.

All three sites revealed some open-air archaeological sites, mostly Holocene/Later Stone Age shell-middens, shell scatters and few stone artefacts scatters.

### DISCUSSION

The visibility at the three sites was often hampered by thick alien vegetation. Hence, more archaeological sites might be identified once the terrain is cleared and/or after excavation and trenching is started.

All three sites identified as possible alternatives for this project are archaeologically significant, but sites 1 and 2 (Driftsands and Bushy Farm) more so than Rietfontein Farm (site 3). Part of their surfaces has previously been disturbed by cutting and vegetation planting.

#### Site Alternative 1: Driftsands

The surface of this site is mostly uneven due to previous disturbances (such as trenching for pipelines), which might have affected the *in situ* archaeological material. Few shell middens and shell scatters are anyhow identified on the proposed site. Namely, eight surface shell scatters were recognized on Site 1 and in one of the eight few stone tools artefacts (type not specified) were also

recorded. Seven shell middens are also present on the area, some of which relatively large. What characterises these middens, compared to the scatters, is the depth of the deposit and the more varied species composition of shell with more abundant artefacts.

### **Site Alternative 2: Bushy Park Farm**

On the area of the second alternative site at least six shell scatters or shell middens were identified. Unfortunately most of them had already been disturbed by both previous cuttings and constant clearing of the vegetation for grazing purposes. Three of these six shell accumulations also bear stone tool artefacts and few bones. The extension of some of these middens is quite wide (30 x 50 m).

### **Site Alternative 3: Rietfontein, Erf 594, Van Stadens East**

As in the previous two cases, the site 3 area was mostly already disturbed. Although a small shell scatter, many churned up mole hills with few archaeological remains and a wide surface shell scatter with the occurrence of few quartz stone tools were identified, none of them is actually positioned in the area that, if chosen, will be impacted by the proposed wind farm and the infrastructures linked to it.

## **SAHRA RECOMMENDATIONS**

Considering the outcome of a Phase 1 Archaeological Impact Assessment, the SAHRA Archaeology, Palaeontology and Meteorite unit supports the recommendations of the specialist and concludes that:

- Site Alternative 3 (Rietfontein) is the one which, at the moment, seems to be the least sensitive area, therefore, this is also, from an archaeological point of view, the most preferred.
- Whichever site is chosen, a professional archaeologist must be appointed during both vegetation clearing and any earth-moving process in order to avoid negative impact on archaeological material.
- If the archaeological material already identified during Phase 1 is going to be impacted by the wind turbines or by any of their infrastructures, mitigation in the form of testpit testing, systematic excavation and sampling must be undertaken before trenching and any other earth-moving activity resulting from this proposed project is carried out. A photographic record must be established immediately before, during and after mitigation. The archaeologist will require a mitigation permit from SAHRA in terms of s. 35 of the National Heritage Resources Act (Act 25 of 1999). On receipt of a satisfactory mitigation (Phase 2) permit report from the archaeologist, SAHRA will make further recommendations in terms of the report such as its final destruction or additional sampling.

## CONCLUSION

If the recommendations made in the specialist report and in this comment are adhered to, the SAHRA Archaeology, Palaeontology and Meteorite Unit has no objection to the development (in terms of the archaeological component of the heritage resources). If any new evidence of archaeological sites or artefacts, palaeontological fossils, graves or other heritage resources are found during development, construction or mining, SAHRA and a professional archaeologist must be alerted immediately. If the newly discovered heritage resources prove to be of archaeological significance a Phase 2 rescue operation might be necessary at the cost of the developer.

Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, the developer must ensure that a professional Palaeontological Desk Top study is undertaken to assess whether or not the development will impact upon palaeontological resources. If this is deemed unnecessary, a letter of recommendation for exemption from a professional Palaeontologist is needed. If the area is deemed sensitive, a full Phase 1 Palaeontological Impact Assessment will be required and if necessary a Phase 2 rescue operation might be necessary.

Decisions on Cultural Landscapes and associated Living Heritage (e.g. Sacred Sites) must be made by the SAHRA Provincial Heritage office (**Mr Thanduxolo Lungile: [tlungile@ec.sahra.org.za](mailto:tlungile@ec.sahra.org.za)**) and the Provincial Heritage Resources Authority of the Eastern Cape to whom this Archaeological Review Comment will also be copied.

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SAHRA

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