



Date: 17 February 2021

Ms Sonette Smit
Greenmined Environmental
Unit MO1, No 37 AECI site
Baker Square, Paardevlei
De Beers Avenue
Somerset West, 7130

Dear Ms Smit

DEA&DP COMMENTS ON THE DRAFT BAR FOR LISTED ACTIVITIES ASSOCIATED WITH THE MINING PERMIT ON A PORTION OF PORTION 4 OF THE FARM WAAI KRAAL NO. 120, BEAUFORT WEST

The heritage-related comments in Section 4.1 of the Department of Environmental Affairs and Development Planning (DEA&DP) response to the Draft Basic Assessment Report (BAR) for the proposed quarry on the farm Waai Kraal (120) outside Beaufort West, dated 29 January 2021, refer.

Comment 4.1 refers to the absence in the Heritage Impact Assessment (HIA) in the Draft BAR of a field assessment of the site. This has since been addressed with the inclusion of the results of the required survey (which took place on 14 December 2020) in the revised HIA issued by ACO Associates on 23 December 2020.

This field assessment found no archaeological sites and only a few pre-colonial artefacts on the site of the proposed quarry. The walkover survey also confirmed the presence of a roughly circular stone-walled kraal in the south-west of the quarry footprint, originally noted on a Google Earth satellite photograph of the site and referred to in the HIA included in the Draft BAR.

The kraal consists of a low wall of dolerite cobbles from the immediate surrounds that have been piled rather than laid in courses. The age of the kraal is unknown but its shape and structure suggests that it is historical and is likely to be no more than perhaps 150 years old, rather than pre-colonial as these were constructed according to a different pattern. The kraal is also not associated with any cultural material to indicate that people in the past lived nearby, which might have made the site of greater interest. The site was assigned a grade of 3C in the HIA and is of relatively low, local heritage significance.

The HIA notes that the quarrying of the proposed mining area is likely to result in the destruction of the kraal structure.

Comment 4.1.3 asks whether the retention of the kraal structure in terms of layout alternatives has been considered.

An alternative layout for the quarry, which avoids the kraal and preserves it on its southern boundary, has been proposed in the Final BAR.

From a heritage perspective this alternative quarry layout is less preferred because although the original quarry layout will mean the loss of the kraal, the alternative layout will open the face of the quarry to the N1 and there will be a marked visual impact on the cultural landscape and sense of place of the area surrounding the quarry that will result from its visibility from the N1.

It is our view that the visual impact of the alternative quarry layout is likely to outweigh the relatively minor loss to the heritage record that will result from the destruction of the kraal. Provided the mitigation proposed in the HIA is implemented (i.e. kraal is photographically recorded and its position accurately mapped) it remains our assessment that the loss of the kraal to the proposed quarrying is tolerable, particularly when assessed against the alternative quarry layout which would likely have a far more marked heritage-related impact.

Lastly, in comment 4.1.4. DEA&DP advises that final comment from HWC must be obtained prior to the submission of the Final BAR to the competent authority, as comment from HWC will inform whether the kraal structure may be destroyed or must be retained.

The revised HIA referred to above was submitted to HWC on 12 February 2021 and their comment is awaited and will be included in the Final BAR.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Gribble', enclosed within a large, loopy circular flourish.

John Gribble
Senior Archaeologist and Heritage Practitioner
ACO Associates cc