



27 August 2015

Attention: Adri Venter
EON Consulting

Dear Ms Venter

HERITAGE STATEMENT AND LETTER FOR HIA EXEMPTION REQUEST: Waterval Solar Park, Gauteng Province.

The above mentioned project refers. It is noted that SAHRA requested a Heritage Impact Assessment to be done. However, the project is located in an area completely disturbed by recent farming activities. Therefore it is expected that the area are unlikely to contain any heritage features.

It is my opinion that the project may be exempted from doing a Heritage Impact Assessment (HIA). The following is applicable:

- The site was visited and an Archaeological Impact Assessment was done by Prof. Tom Huffman of Archaeological Resources Management of the School of Geography & Environmental Management at the University of the Witwatersrand in 2007 (Appendix A).
- Even then he realised that the site had no large potential for containing heritage sites.
- Although he did report identifying stone tools, these were all found out of context as a result of the farming activities in the area.
- He recommended that the development may continue.
- It therefore is clear that no further heritage work is needed.

It is therefore noted that the entire area has been disturbed and the chances therefore of finding any heritage related features are indeed extremely slim. The farming activities undoubtedly would have demolished any possible signs of earlier human activities and what may remain are out of context and therefore of low significance.

Resultantly all possible signs of heritage resources would have been demolished. Therefore it is very unlikely that any archaeological or cultural historical site or occurrence will be or was disturbed.

It is therefore believed that an additional Heritage Impact Assessment (HIA) is not needed for this project. This letter serves as an exemption request, which should be submitted to the South African Heritage Resources Agency (SAHRA). Please quote the Case Reference (see Appendix B) indicating it as 'Waternal Solar Park'.

The developer should however note that due to the nature of archaeological material, such sites, objects or features, as well as graves and burials may be uncovered during construction activities on site. In such a case work should cease immediately and an archaeologist should be contacted as a matter of urgency in order to assess such occurrences.

I trust that you will find this in order.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Dr AC van Vollenhoven', is written over a light-colored rectangular background.

Dr AC van Vollenhoven: Director

APPENDIX A – ARCHAEOLOGICAL IMPACT ASSESSMENT

**ARCHAEOLOGICAL IMPACT ASSESSMENT FOR THE GRACEVIEW
INDUSTRIAL PARK, GAUTENG**

A Phase I report prepared for Seaton Thompson and Associates
P.O. Box 936, IRENE, 0062

Professor T.N. Huffman

Archaeological Resources Management
School of Geography, Archaeology & Environmental Management
University of the Witwatersrand
Johannesburg

May 2007

ARCHAEOLOGICAL IMPACT ASSESSMENT FOR THE GRACEVIEW INDUSTRIAL PARK, GAUTENG

EXECUTIVE SUMMARY

There are no sites of archaeological significance, and therefore mitigation is not required.

INTRODUCTION

Dr R. Graca, trading as Blue Rose Developments, intends to establish an Industrial Park on portions of the Farm Waterval 150 IR south of Johannesburg (Fig. 1). The environmental coordinators for the project, Seaton Thompson and Associates, commissioned Archaeological Resources Management (ARM), to examine the area for sites of archaeological and historical interest. It was ARM's task to assess the significance of any sites in terms of Sections 35 and 38 of the National Heritage Resources Act (Act No. 25 of 1999).

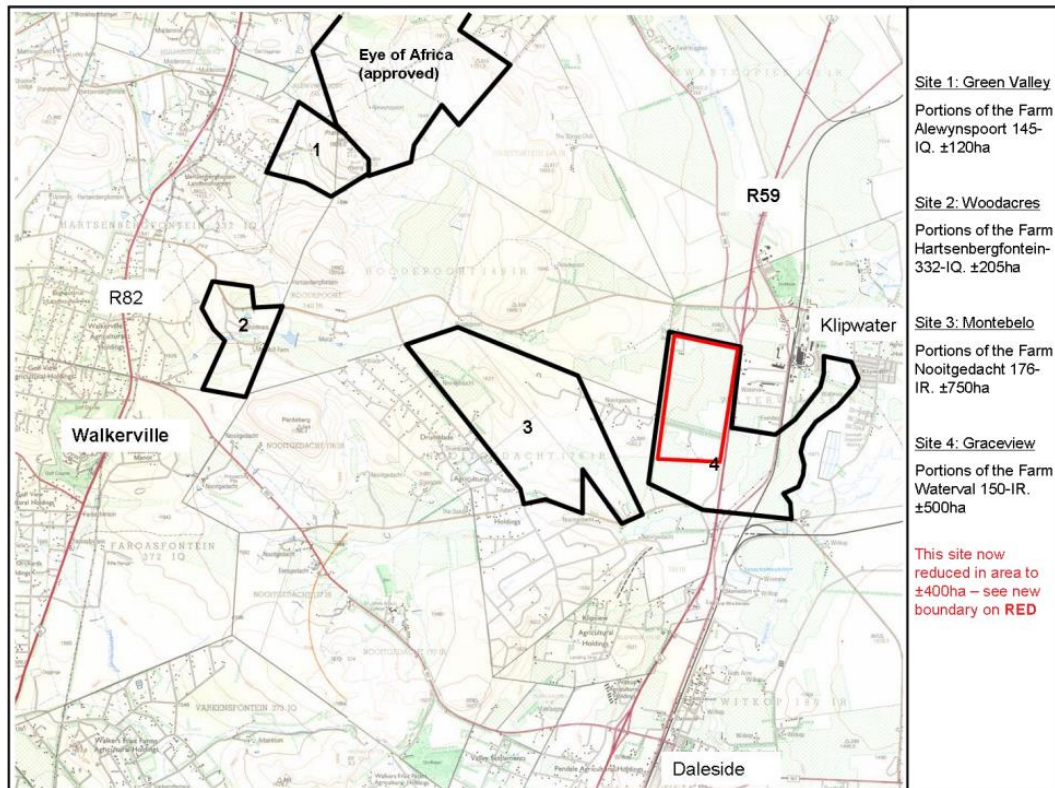


Fig. 1. Location of project area number 4.

BACKGROUND

There has been little previous archaeological investigation near the project area. In the larger district, Stone Age and Historic sites are on record in the Archaeological Survey files at the University of the Witwatersrand. For the Stone Age, some Earlier Stone Age (about 1 million to 400 000 years ago) artefacts, such as handaxes, cleavers and other bifaces, occur in river gravels of the Vaal system, while Middle Stone Age (400 000 to 40 000 years ago) sites with points and blades are more common. Later Stone Age (40 000 to 1000 years ago) sites cluster in areas, such as the Magaliesberg, that have rock shelters. A British blockhouse still stands just to the south of the project area.

METHOD

Two ARM staff visited the project area on 18 February 2007. The team traversed the ground on foot. Sites were recorded with a hand-held GPS instrument calibrated to WGS 84, and then transferred to the 1: 50 000 map sheet 2628AC Alberton.

Site significance is based on five main criteria: (1) primary versus secondary context; (2) amount of deposit; (3) number and variety of features; (4) uniqueness; and (5), potential to answer present research questions. Sites with no significance do not require mitigation, low to medium sites may require limited mitigation, high significance requires extensive mitigation, while outstanding sites should not be disturbed at all. Recognizable graves have high social value regardless of their archaeological significance.

RESULTS

Cultivated grass covered most of the ground, and visibility was poor. Nevertheless, we are satisfied with the results (Fig. 2).

As part of agricultural activities, farmers have cleared surface stone from the fields and placed them in piles. Two piles (**Site 1**: 26 25 27.8S 28 04 31E & **Site 2**: 26 26 S 28 03E) contained a few Earlier Stone Age artefacts. The field itself lies on the ancient floodplain of the Kliprivier, and these artefacts were probably not *in situ* even before they were removed. Consequently, they have *no significance*.

In contrast, a few Middle Stone Age artefacts lay around the edge of a small drainage in an unploughed zone (**Site 3**: 26 26 03.4S 28 04 24.9). Quartzite flakes were scattered among

outcrops of laterite and conglomerates. These few artefacts were probably discarded in the general area, but they are probably not in their original position. Consequently they have *low significance*.

A few MSA artefacts also lay around an outcrop of dolomite (**Site 4**: 26 26 21.5S 28 04 06.4) next to another drainage. Because they now lay on the surface, natural forces have probably shifted them from their original position of discard. They have *low significance*.

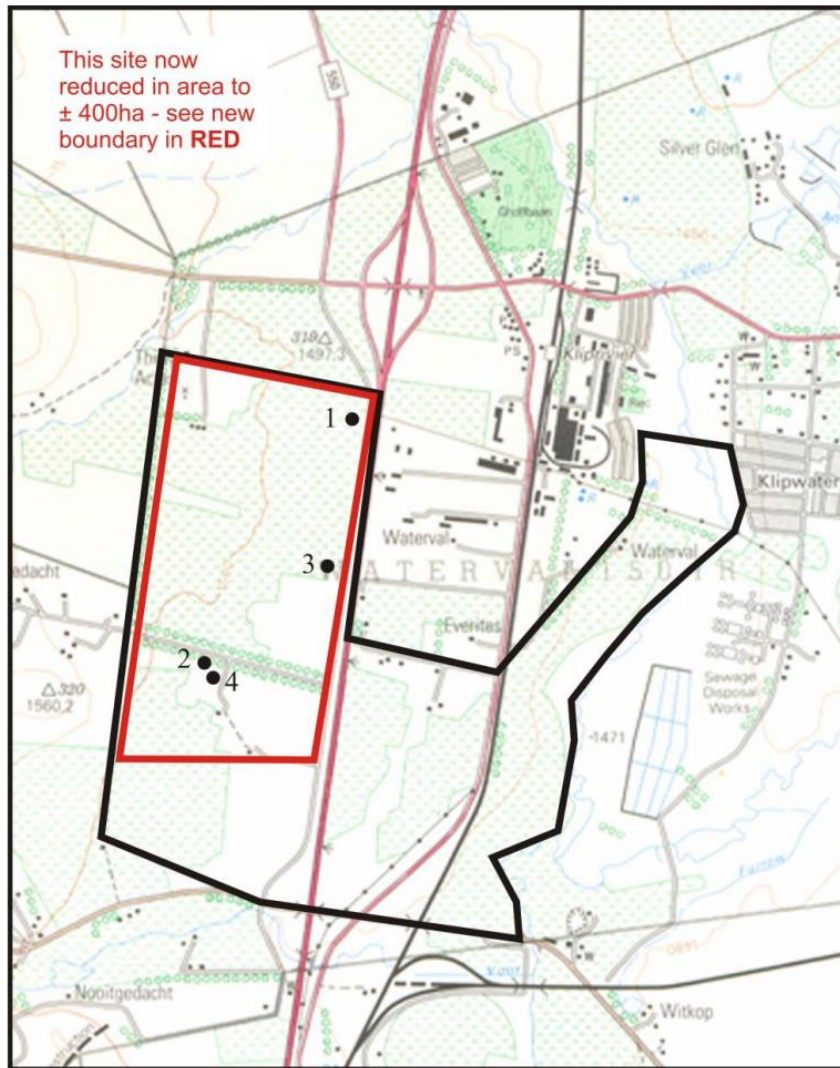


Fig. 2. Location of Sites inside the project area.

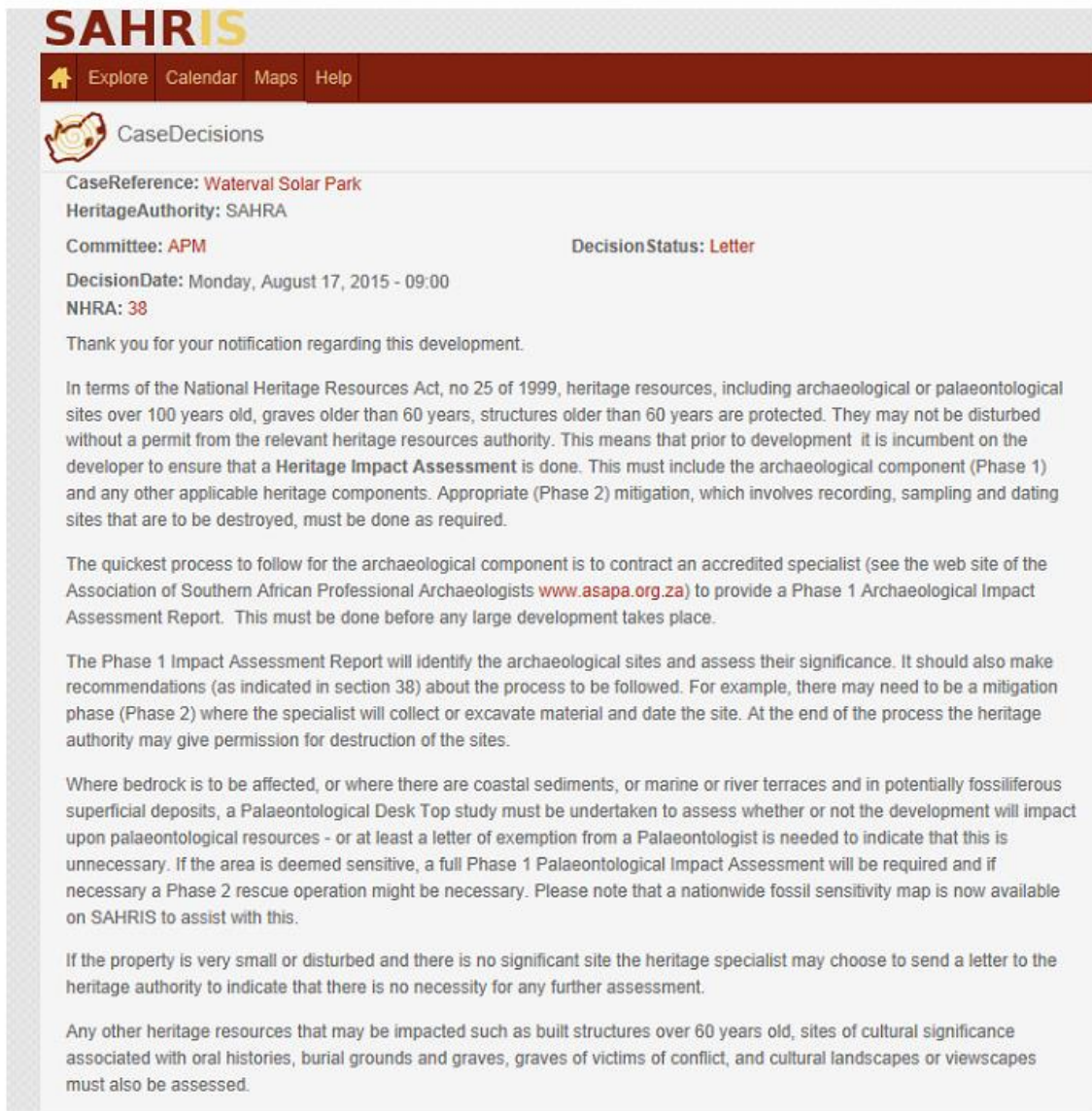
RECOMMENDATIONS

The sites have no research value beyond their present recording because they are not in primary context, and artefact numbers are too low. Further investigation is therefore not required. Blue Rose Development must remember, however, that if *in situ* deposits are uncovered in the course of development, the South African heritage Resource Agency must be notified so that the material can be examined.

With this proviso, there are no archaeological reasons why the development should not proceed.

APPENDIX B – SAHRA COMMENTS

The draft scoping report was submitted to SAHRA via their website (SAHRIS) and the following comments were received:



The screenshot shows the SAHRIS website interface. At the top, the SAHRIS logo is displayed in red and yellow. Below the logo is a navigation bar with a home icon and links for 'Explore', 'Calendar', 'Maps', and 'Help'. The main content area is titled 'CaseDecisions' and features a case summary for 'Waterval Solar Park'. The summary includes the following details: CaseReference: Waterval Solar Park; HeritageAuthority: SAHRA; Committee: APM; DecisionStatus: Letter; DecisionDate: Monday, August 17, 2015 - 09:00; and NHRA: 38. Below the summary, there is a thank you message and three paragraphs of text providing guidance on the archaeological and palaeontological assessment process. The first paragraph explains the requirements for heritage resources under the National Heritage Resources Act, 1999. The second paragraph describes the process for the archaeological component, including the need for a Phase 1 Archaeological Impact Assessment Report. The third paragraph discusses the requirements for palaeontological resources, including the need for a Palaeontological Desk Top study and a Phase 1 Palaeontological Impact Assessment. The fourth paragraph mentions the availability of a nationwide fossil sensitivity map. The fifth paragraph notes that a letter of exemption from a Palaeontologist is needed to indicate that a full Phase 1 Palaeontological Impact Assessment is unnecessary. The sixth paragraph states that a nationwide fossil sensitivity map is now available on SAHRIS to assist with this. The seventh paragraph explains that if the property is very small or disturbed and there is no significant site, the heritage specialist may choose to send a letter to the heritage authority to indicate that there is no necessity for any further assessment. The eighth paragraph states that any other heritage resources that may be impacted such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

CaseReference: Waterval Solar Park
HeritageAuthority: SAHRA
Committee: APM **DecisionStatus:** Letter
DecisionDate: Monday, August 17, 2015 - 09:00
NHRA: 38

Thank you for your notification regarding this development.

In terms of the National Heritage Resources Act, no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that prior to development it is incumbent on the developer to ensure that a **Heritage Impact Assessment** is done. This must include the archaeological component (Phase 1) and any other applicable heritage components. Appropriate (Phase 2) mitigation, which involves recording, sampling and dating sites that are to be destroyed, must be done as required.

The quickest process to follow for the archaeological component is to contract an accredited specialist (see the web site of the Association of Southern African Professional Archaeologists www.asapa.org.za) to provide a Phase 1 Archaeological Impact Assessment Report. This must be done before any large development takes place.

The Phase 1 Impact Assessment Report will identify the archaeological sites and assess their significance. It should also make recommendations (as indicated in section 38) about the process to be followed. For example, there may need to be a mitigation phase (Phase 2) where the specialist will collect or excavate material and date the site. At the end of the process the heritage authority may give permission for destruction of the sites.

Where bedrock is to be affected, or where there are coastal sediments, or marine or river terraces and in potentially fossiliferous superficial deposits, a Palaeontological Desk Top study must be undertaken to assess whether or not the development will impact upon palaeontological resources - or at least a letter of exemption from a Palaeontologist is needed to indicate that this is unnecessary. 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. Please note that a nationwide fossil sensitivity map is now available on SAHRIS to assist with this.

If the property is very small or disturbed and there is no significant site the heritage specialist may choose to send a letter to the heritage authority to indicate that there is no necessity for any further assessment.

Any other heritage resources that may be impacted such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

In terms of the above comments, a heritage impact assessment is required.