



**Agency for Cultural Resource Management**  
**Specialists in Archaeological Studies and Heritage Resource Management**

01 November, 2017

Att: Ms Natasha Higgitt  
SAHRA  
PO Box 4637  
Cape Town, 8001

Dear Ms Higgitt,

**ARCHAEOLOGICAL ASSESSMENT, CONSTRUCTION OF ILLEGAL VINEYARDS ON PORTION 12 OF ORANGE FALLS FARM NO. 16, AUGRABIES, NORTHERN CAPE PROVINCE: SECTION 24G RECTIFICATION PROCESS**

*CASE ID: 11307*

Your letter dated 20 October, 2017 (Final Comment) refers:

I would like to once again emphasise that the affected property (i. e. Orange Falls Farm 16/12), where an illegal vineyard development has been in operation since 2010, constitutes a severely transformed landscape. The subject property is completely (i. e. end to end) covered in vineyards and under 3m high shade cloth, with 2m wide gravel roads in between the rows of vineyards. Any archaeological resources that may have been present on the site would have been destroyed by the development, although isolated tools may still be present, albeit in a severely degraded context.

According to consulting palaeontologist Dr John Almond (pers. comm. 20 June, 2017), the affected bedrocks are probably metamorphic or granitic basement, and there is a 'slight possibility of fossiliferous alluvial gravel'. Dr Almond (pers. comm. June 2017) however, 'doubts that the project is of heritage significance'.

Any graves (highly unlikely) or tangible heritage such as building or structures (none occur) would obviously no longer be visible, either. A site visit conducted on 11<sup>th</sup> May 2017, can confirm this.

As previously indicated, a HIA (comprising archaeology, palaeontology, tangible heritage & graves) will be conducted on the property immediately south of the illegal vineyard development, but this will be done as part of a separate Basic Assessment Process. Large numbers of tools were encountered during the baseline study for the proposed new development, but no graves or tangible heritage was located.

I believe that SAHRA request for a HIA on the illegal vineyard development is unrealistic, unfair, of no heritage value, and will ultimately be a waste of time, money and resources.

I urge SAHRA to reconsider their decision.

Yours sincerely

Jonathan Kaplan