

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 9900

Date: Wednesday October 19, 2016  
Page No: 1

## Final Comment

### In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mercedes-Benz South Africa (Pty) Ltd

**Mercedes-Benz South Africa (Pty) Ltd (MBSA) proposes to develop a High Speed Proving Ground for vehicle testing for the Mercedes-Benz Research and Development Team. The site is located on property Steenkamps Pan, Farm 419/06 in the //Khara Hais Municipality, approximately 38 km North-east of Upington, Northern Cape Province**

WSP| Parsons Brinkerhoff was appointed by Mercedes-Benz South Africa to conduct an Environmental Impact Assessment (EIA) process for the proposed Mercedes-Benz South Africa High Speed Proving Ground (HSPG). The proposed development is located on Steenkamps Pan, Farm 419/06 in the //Khara Hais Municipality, Northern Cape Province. A Final EIA was completed in support of the Environmental Authorisation Application in terms of the National Environmental Management Act, 1998 (NEMA) in 2011. The proposed activities will include the construction of vehicle track 17 km long and 13 m wide, and a handling track of 5.5 km long and 16 m wide. Associated infrastructure will include bridges, access roads, multi-functional area, diesel particulate filter road, graveled roads, impact roads, workshop, tyre storage, fuel station, power supply, waste collection area, water reservoir, wash bay, parking area and communication system. The proposed development received a positive Environmental Authorisation on the 10 August 2016 (NC/EIA/03/ZFM/KHA/UP12/2015).

The Agency for Cultural Resources Management (ACRM) and BM Geological Services were appointed to conduct the Heritage Impact Assessment (HIA) and the Palaeontological Impact Assessment (PIA) for the project.

*Kaplan, J. 2015. Heritage Impact Assessment: Proposed High Speed Test Track on Portion 6 of Farm No. 419, Steenkampspan near Upington, Northern Cape Province.*

Low density surface scatters of Middle Stone Age (MSA) and Later Stone Age (LSA) lithics were identified within the proposed footprint area. Two large MSA scatters (Sites 055 and 056) were located 30 m from the proposed calcrete quarry, and MSA and LSA lithics were found scatters around the base of stone outcrop known as Klip Kopje, which has been identified as a quarry for road building operations. All of the aforementioned sites were rated as sites of low significance and no further mitigation measures are required



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Three high density LSA hunter gatherer campsites (Sites 028, 030 and 087) were identified outside of the development footprint area, and will not be impacted by the proposed development. A Late Holocene LSA campsite (Sites 011-014; 715) that included lithics, an anvil, grindstone fragments and potential sub-surface deposit was identified within the proposed test track area and will be impacted on. Late Holocene LSA campsites (745-751 and 753) including similar artefacts to the previously discussed sites was identified outside of the development footprint and will not be impacted. The above mentioned sites were rated as sites of medium to low significance.

Recommendations provided in the report include the following:

- Sites 028, 030 and 087 must be avoided during the construction and operational phase of the project. The site layout plan indicates that these, Grade 3B rated sites (of moderate to high significance) will not be impacted by proposed construction activities. Archaeological mitigation will therefore not be required. On the advice of the consultant, the sites have been declared 'No-Go Areas';
- Sites 011-014 and 715, in the alignment of the oval track, must be mitigated. The remains must be collected by a professional archaeologist. Sand must also be sieved for buried archaeological material. The remains must be curated and written up and a report submitted to the South African Heritage Resources Agency (SAHRA). No archaeological material may be collected without a permit issued by SAHRA;
- A proposed 50m wide cutting on both sides of the centre line of the oval track between km 5 and km 7.1 will entail considerable earthmoving activities which may expose or uncover archaeological heritage, such as buried hunter-gatherer campsites and human remains. Therefore, it is recommended that archaeological monitoring by a professional archaeologist take place during earthmoving operations between km 5 and km 7.1;
- A 25m wide buffer must be established around Sites 055 and 056, which are located less than 30m from the northwestern boundary of the proposed calccrete quarry;
- The proposed haul road from the calccrete quarry must avoid Sites 055 & 056;
- Sites 745-751 and Site 753 in the proposed gravelled bad roads must be avoided in the final design of the roads. If this is not possible, the remains must be collected by a professional archaeologist. Sand must also be sieved for buried archaeological material. The remains must be curated and written up and a report presented to SAHRA. No archaeological material may be collected without a permit issued by SAHRA;
- The design and layout of the proposed gravelled bad roads must avoid the dune areas. The flatter, vegetated south eastern portion of the site is preferred for construction of the roads;
- Vegetation clearing operations and earthworks in the proposed gravelled bad roads must be monitored by a professional archaeologist. Most of the core footprint area is densely vegetated resulting in poor



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archaeological visibility. It is possible that buried LSA campsites and unmarked human remains may be exposed during vegetation clearing operations and road construction activities;

- The Environmental Control Officer (ECO) and site contractors must be briefed by the archaeologist prior to the construction phase commencing;
- This is to alert them to the possibility of uncovering archaeological heritage and the process to be followed in the event of this occurring;
- Should any unmarked human remains or ostrich eggshell caches for example, be uncovered or exposed during construction activities these must immediately be reported to the archaeologist (Jonathan Kaplan 082321 0172), or SAHRA (Att: Mr. Philip Hine 021462 4502). Burials and ostrich eggshell caches must not be removed or disturbed until inspected by a professional archaeologist; and
- The above recommendations must be included in the Environmental Management Plan (EMP) for the project.

*Millsteed, B. 2016. Full Palaeontological Impact Assessment Report on the site of Mercedes-Benz South Africa's Proposed New Proving Ground to be located on the Farm Steenkamps Pan 419 Portion 6, Approximately 38 Km NE of Upington, in the Northern Cape Province.*

A field survey of the proposed development was conducted by Prof. B Millsteef on the 9 December 2015. No fossils were identified during the site visit. The project area is underlain by the unfossiliferous Proterozoic Leerkrans Formation, Koras Group and the Blauwkrans Granite. The Cenozoic Kalahari Group covers most of the project area and consists of a layer of calcrete overlain by Aeolian sands of the Gordonia Formation which is known for highly significant fossil assemblages elsewhere in the Northern Cape. However, the potential for any negative impacts upon the palaeontological heritage is assessed as low, however the severity of the impact could potential be high on exposures of Gordonia Formation Cenozoic regolith. Recommendations provided in the report include the following:

- The Environmental Control Officer (ECO) or person responsible for compliance with the approved Environmental Management Programme (EMPr) is trained to identify types of fossils that may be expected to occur within the Gordonia Formation. This employee should make ongoing and thorough examinations of any excavations within the Gordonia Formation as they occur;
- Should any fossil material be identified, the particular excavation(s) should be halted and SAHRA informed of the discovery. A qualified palaeontologist should be appointed to evaluate the significance of the fossil materials; and
- Should scientifically or culturally significant fossil material exist within the project area, any negative impact upon it could be mitigated by its excavation (under permit from SAHRA) by a palaeontologist and the resultant material being lodged with an appropriately permitted institution. In the event that an



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excavation is impossible or inappropriate, the fossil or fossil locality could be protected and the site of any planned construction moved.

## Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts and promotes the recommendations in the HIA and PIA. The recommendations in the HIA and PIA, and the following additional conditions must be included in the Environmental Management Programme (EMPr):

- A Conservation Management Plan (CMP) must be developed for the in-situ conservation and management of heritage resources that are located within the development area that will not be subjected to mitigation measures. This CMP must be submitted to SAHRA for comment prior to the construction phase;
- Site 011-014 and 715 must be subjected to archaeological excavation under a permit applied in terms of section 35 of the National Heritage Resources Act, 1999 (Act 25 of 1999) (NHRA) and Chapter IV of the NHRA Regulations. This permit must be applied for by a qualified archaeologist. An agreement with a recognized repository must be included in the permit application for the long-term curation of excavated heritage material;
- A Watching Brief must be conducted by a professional archaeologist between km 5 and km 7.1 of the oval track, and for the vegetation clearance and earthworks in the proposed graveled bad roads. This will entail the on-site monitoring during the construction phase. A Watching Brief Report detailing the results of the monitoring must be submitted to SAHRA upon completion;
- If it is not possible to avoid sites 745-751 and 753, the sites must be subjected to archaeological excavation under a permit applied in terms of section 35 of the NHRA and Chapter IV of the NHRA Regulations. This permit must be applied for by a qualified archaeologist. An agreement with a recognized repository must be included in the permit application for the long-term curation of excavated heritage material;
- If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/John Gribble 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required.

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Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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John Gribble  
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/367670>  
(DENC, Ref: NC/EIA/03/ZFM/KHA/UP12/2015)

**Terms & Conditions:**

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.