CHAPTER 9 HERITAGE IMPACT ASSESSMENT

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9.1 SUMMARY

This chapter has been adapted from an Archaeological Impact Assessment (AIA) conducted by Dr David Morris from the McGregor Museum as part of the EIA for the proposed Douglas Solar Energy Project. Following a desktop assessment of the Douglas solar energy site, a field-based heritage impact assessment has been carried out in April 2012. [[The chapter will be completed by a review of paleontological sensitivity and assessment of potential impact by Dr John Almond from Natura cc.]]

As predicted in the desktop study, a widespread surface scatter of stone tools was found to occur over the entire area surveyed. These artefacts represent Pleistocene stone tool manufacture but their present context is a palimpsest, i.e. they are in a derived, secondary context with mixing of material of possibly differing age. Hence while densities are often fairly high, the archaeological significance of such material is generally low.

Alternatives for solar field location, the location of associated buildings and options for electrical connection are weighed. The study suggests that Alternative 1 (upper part of site) may be marginally preferable in terms of solar field location. Apart from this, is recommended that, from an archaeological viewpoint, implementation may proceed without further mitigation.

9.2 INTRODUCTION

The aim of the study is to locate and map archaeological sites that may be impacted by the planning, construction and implementation of the proposed Douglas solar energy project, to assess the significance of the potential impacts and to propose measures to mitigate the impacts.

The author of this report is a qualified archaeologist (PhD) accredited as a Principal Investigator by the Association of Southern African Professional Archaeologists. The author has worked as a museum archaeologist in the Northern Cape since 1985 and has carried out research and surveys in the region (Beaumont & Morris 1990, Morris & Beaumont 2004).

The author is independent of the organization commissioning this specialist input, and provides this Specialist Report within the framework of the National Heritage Resources Act (No 25 of 1999).

9.2.1 Approach to the study

The methodology for this heritage impact assessment includes a survey on foot across the terrain of the proposed solar field and associated infrastructure. This study assesses the relative sensitivity of alternative placement options from an archaeological perspective.

The approach followed for the archaeological study entailed the following:

- A one-day survey of the proposed solar energy farm that included an assessment of the alternative location sites for the solar field, and associated infrastructure.
- An assessment of the alternatives for solar field location, placement of associated buildings and options for electrical connections.
- Description of the area and proposed site in terms of heritage/archaeological features with reference to any relevant information for future planning and related implications for heritage assets;
- Identification of any potential fatal flaws due to the proposed project and proposed facilities;
- Recommendations of practical measures which can be incorporated into the planning of the project that will result either in the avoidance of potentially significant negative environmental impacts or

their mitigation to the extent that residual effects fall within acceptable limits; and enhancement of positive aspects of the project;

- Estimation of the carrying capacity of the site for solar energy development in terms of environmental/social criteria;
- Identification of any potential "no go areas" on the site where the panels should not be located;
- Sensitivity maps including all relevant archaeological/heritage impacts mapping of a zoning on a lowmedium-high sensitivity rating
- The integration of visual aspects into heritage impact assessment is sought and relation to the landscape pattern and cultural values.

9.2.2 Constraints and limitations

Major limitation in prediction of archaeological sensitivity is the limited visible surface features, given that archaeological traces, where present, are often, indeed usually, buried. This is however not an issue for much of the proposed site since erosion has occurred over large parts of it rendering any artefacts there highly apparent at the surface.

In certain zones of the site, for example in depressions or drainage lines, archaeological traces may be buried, although they may become exposed by burrowing animals or erosion.

There is a possibility that significant features may occur sub-surface, including possible precolonial graves. Standard provisos are given for alerting heritage authorities in the event of discovery of such hidden features during project development or operational phases.

9.3 BACKGROUND INFORMATION ON THE PROPOSED PROJECT

Mainstream Renewable Power South Africa plans to develop a solar energy project south west of the Orange River on Portion 1 of Roode Kop No 5, located west of Douglas, in the Northern Cape.

Alternatives for solar field technology type are being considered to generate electricity: the alternative 1 is to install photovoltaic (PV) modules and the alternative 2 is to install concentrated photovoltaic (CPV) modules on the solar field. There is to this date no preferred alternative and therefore both alternatives weigh as much in the EIA report.

In terms of solar field location, there are 2 alternatives: (1) the upper part of the site and (2) the lower part of the site. There is to this date no preferred alternative and therefore both alternatives weigh as much in the EIA report.

Alternatives for the location of associated buildings (O&M buildings) are: (1) upper part of the site north corner, (2) upper part of the site south corner and (3) lower part of the site. There is to this date no preferred alternative and therefore both alternatives weigh as much in the EIA report.

Alternatives for electrical connection of the solar facility to the existing grid are: (1) loop connection (approx. 500 m long) into the existing 132 kV Ovaal-Disselfontein transmission power line that feeds into the Ovaal Pump substation located approximately 2 km north-east of the site; (2) new 132 kV line (approx. 3 km long) running parallel to the existing Ovaal-Disselfontein transmission power line with an on-site substation located at the bottom-right corner of the proposed Douglas site; and (3) new 132 kV line (approx. 1.5 km long) running parallel to the R 357 road (over the existing bridge) with a on-site substation located at the top-right corner of the proposed Douglas site. There is to this date no preferred alternative and therefore both alternatives weigh as much in the EIA report.

9.4 DESCRIPTION OF THE RECEIVING ENVIRONMENT AND REGIONAL HERITAGE RESOURCES

The central interior where the site under investigation is situated is at the north eastern edge of the Karoo, on the west bank of the Orange River near its confluence with the Vaal, west of the Northern Cape town of Douglas.

The terrain consists of farmland apparently devoted mainly to grazing camps for sheep and cattle farming, with limited agricultural fields along the river (adjoining/nearby properties have been given over more substantially to centre-pivot irrigation farming).

The eastern side of the property slopes towards the Orange River. Away from the river the terrain levels into a fairly featureless plain with no obvious major nodes for past human activity such as koppies. Vegetation is relatively sparse and hence any surface archaeological traces would be fairly visible. Subsurface traces would occur in areas where sediments have accumulated, particularly in downslope areas near the river or in valleys/slight depressions and around pans on the property.

The region has a wealth of precolonial archaeological sites (Beaumont & Morris 1990; Morris & Beaumont 2004 for areas just east of here), these often being focused along rivers such as the Orange and the Vaal, on or around koppies, as well as at the verges of pans. Also notable in the study area are rock engravings on dolerite hills (Wilman 1933; Morris 1988).

Previous impact assessments in the surrounding area (McGregor Museum records; Morris 2009a & b) have noted very widespread low to medium density surface scatters of stone artefacts of Pleistocene age on terraces and plains on both sides of the Orange River above its confluence with the Vaal. These essentially lag deposits, not in primary context, undoubtedly relate to the abundance of raw materials available in Dwyka contexts. The material includes Middle Stone Age (MSA) artefacts. Closer to the river near Douglas, gravel deposits contain Acheulean age artefacts.

Later Stone Age sites have been documented on or within silt and wind-blown sand deposits on the north east bank of the Orange near to the study site (Morris 2009b). Further upstream along the Orange rock engraving sites occur (Fock & Fock 1989).

Colonial era traces may occur in association with farming activity.

9.5 DETERMINING ARCHAEOLOGICAL SIGNIFICANCE

In addition to guidelines provided by the National Heritage Resources Act (Act No. 25 of 1999), a set of criteria based on Deacon (nd) and Whitelaw (1997) for assessing archaeological significance has been developed for Northern Cape settings (Morris 2000). These criteria include estimation of landform potential (in terms of its capacity to contain archaeological traces) and assessing the value to any archaeological traces (in terms of their attributes or their capacity to be construed as evidence, given that evidence is not given but constructed by the investigator).

9.5.1 Estimating site potential

Table 1 (below) is a classification of landforms and visible archaeological traces used for estimating the potential of archaeological sites (after J. Deacon and, National Monuments Council). Type 3 sites tend to be those with higher archaeological potential, but there are notable exceptions to this rule, for example the renowned rock engravings site Driekopseiland near Kimberley which is on landform L1 Type 1 – normally a setting of lowest expected potential. It should also be noted that, generally, the older a site the poorer the preservation, so that sometimes any trace, even of only Type 1 quality, can be of exceptional significance. In light of this, estimation of potential will always be a matter for archaeological observation and interpretation.

9.5.2 Assessing site value by attribute

Table 2 is adapted from Whitelaw (1997), who developed an approach for selecting sites meriting heritage recognition status in KwaZulu-Natal. It is a means of judging a site's archaeological value by ranking the relative strengths of a range of attributes (given in the second column of the table). While aspects of this matrix remain qualitative, attribute assessment is a good indicator of the general archaeological significance of a site, with Type 3 attributes being those of highest significance.

Class	Landform	Туре 1	Type 2	Туре 3	
L1	Rocky surface	Bedrock exposed	Some soil patches	Sandy/grassy patches	
L2	Ploughed land	Far from water	In floodplain	On old river terrace	
L3	Sandy ground, inland	Far from water	In floodplain or near feature such as hill/dune	On old river terrace	
L4	Sandy ground, Coastal	>1 km from sea	Inland of dune cordon	Near rocky shore	
L5	Water-logged deposit	Heavily vegetated	Running water	Sedimentary basin	
L6	Developed urban	Heavily built-up with no known record of early settlement	Known early settlement, but buildings have basements	Buildings without extensive basements over known historical sites	
L7	Lime/dolomite	>5 myrs	<5000 yrs	Between 5000 yrs and 5 myrs	
L8	Rock shelter	Rocky floor	Sloping floor or small area	Flat floor, high ceiling	
Class	Archaeological traces	Туре 1	Type 2	Туре 3	
A1	Area previously excavated	Little deposit remaining	More than half deposit remaining	High profile site	
A2	Shell or bones visible	Dispersed scatter	Deposit <0.5 m thick	Deposit >0.5 m thick; shell and bone dense	
A3	Stone artefacts or stone walling or other feature visible	Dispersed scatter	Deposit <0.5 m thick	Deposit >0.5 m thick	

 Table 1. Classification of landforms and visible archaeological traces for estimating the potential for archaeological sites (after J. Deacon, National Monuments Council).

Table 2. Site attributes and value assessment (adapted from Whitelaw 1997)

Class	Attribute	Туре 1	Type 2	Туре 3
1	Length of sequence/context	No sequence Poor context Dispersed distribution	Limited sequence	Long sequence Favourable context High density of arte/ecofacts
2	Presence of exceptional items (incl regional rarity)	Absent	Present	Major element
3	Organic preservation	Absent	Present	Major element
4	Potential for future archaeological investigation	Low	Medium	High
5	Potential for public display	Low	Medium	High
6	Aesthetic appeal	Low	Medium	High
7	Potential for implementation of a long-term management plan	Low	Medium	High

9.6 PERMIT REQUIREMENTS

In the event that significant heritage resources are found that require phase 2 mitigation then specific mitigation permit/s would need to be sought from SAHRA or the Northern Cape Heritage Authority, Ngwao Boswa jwa Kapa

Bokone (depending on which of these is the appropriate authority at the time and under the circumstances: currently archaeological matters go through SAHRA and built environment matters through Boswa; but this could change if Boswa becomes accredited for archaeology).

Where mitigation is not required but heritage resources (low significance) are nevertheless likely to be impacted, then a destruction permit would need to be obtained before construction proceeds.

9.7 RESULTS OF THE DESK TOP STUDY

9.7.1 ARCHAEOLOGY

The desktop study has indicated that part or much of the area would be found to have varying densities of surface Stone Age scatters such as have been found on the opposite bank (McGregor Museum records; Morris 2009a &b); that generally older material might be found in terraces or terrace remnants above and away from the river, as also in deeper gravels near the river channel; while Later Stone Age material including microlithic stone tools, possibly pottery, and fragments of ostrich eggshell water flasks could occur near the river bank. Near to the river it was also possible that Later Stone Age burials could be encountered: none had been recovered from the local area in the past but examples were known from along the Vaal River east of Douglas and along the nearby Riet River (Humphreys 1982).

Rock engravings were known to occur in the wider region but none had been recorded close to this site (Wilman 1933; Morris 1988). It was possible that engravings could be found locally if suitable outcrops of either dolerite or Venterdorp andesite occurred, but this would be unlikely in the absence of such outcrops.

9.7.2 BUILT ENVIRONMENT AND COLONIAL ERA HERITAGE

Google Earth images revealed that the only major nearby farm infrastructure was situated just north of the Douglas-Prieska road, i.e. outside Roode Kop 5 Portion 1, with no obvious older/abandoned farm settlements on Roode Kop 5 Portion 1 itself. It was possible that farm graves might occur near to the site.

9.7.3 SENSE OF PLACE, VISUAL IMPACTS AND SCENIC ROUTES

The terrain did not appear to be one that is likely to be sensitive from a touristic point of view, both banks of the river already hosting agricultural and industrial interventions.

9.7.4 POTENTIALLY SIGNIFICANT IMPACTS TO BE ASSESSED

Any area or linear, primary and secondary, disturbance of surfaces in any of the alternative proposed development locales of configurations could have a destructive impact on heritage resources, where present. In places where such resources occur, they are likely to be of a nature that potential impacts could be mitigated by documentation and/or salvage following approval and permitting by the South African Heritage Resources Agency and, in the case of any built environment features, by Ngwao Bošwa jwa Kapa Bokone (the Northern Cape Heritage Authority). Although unlikely, there may be some that could require preservation in situ and hence the selection of one alternative over another or modification of intended placement of development features.

Disturbance of surfaces includes any construction: of a road, erection of a pylon, or preparation of a site for a sub-station, or plant, or building, or any other clearance of, or excavation into, a land surface. In the event of archaeological materials being present such activity would alter or destroy their context (even if the artefacts themselves are not destroyed, which is also obviously possible). Without context, archaeological traces are of much reduced significance. It is the contexts as much as the individual items that are protected by the heritage legislation.

Some of the activities indicated here have a generally lower impact than others. For example, Sampson (1985) has shown that power lines tend to be less destructive on Stone Age sites than roads since access along the

route of the line during construction and maintenance tends to be by way of a 'twee-spoor' temporary roadway (not scraped, the surface not significantly modified). Individual tower positions might be of high archaeological significance (e.g. a grave, or an engraving). The impact of a 'twee-spoor' could be far greater on Iron Age sites in other parts of South Africa, where stone walling might need to be breached.

9.8 RESULTS OF THE FIELD WORK STUDY

The manner in which archaeological and other heritage traces or values might be affected by the proposed development may be summed up in the following terms: *it would be any act or activity that would result immediately or in the future in the destruction, damage, excavation, alteration, removal or collection from its original position, any archaeological material or object (as indicated in the National Heritage Resources Act (No 25 of 1999)).* The most obvious impact in this case would be land surface disturbance associated with infrastructure construction.

The property Portion 1 of Roode Kop No 5 visited on 11 April 2012 and examined on foot. In summary the findings can be reported in relation to predictions made during the desktop assessment (see 9.7 above):

9.8.1 Archaeological

1) That most of the area would be found to have varying densities of surface Stone Age scatters such as have been found on the opposite bank of the Orange River (McGregor Museum records; Morris 2009a &b). This prediction was substantially corroborated by field observations, namely that virtually the entire surface of Roodekop No 5 Portion 1 is strewn with stone artefacts, mainly Middle Stone Age in character, but lacking context. It appeared that the landscape had been gradually lowered by erosion and the artefacts comprise a palimpsest or lag deposit probably containing elements of differing age.

In terms of the archaeological significance matrices (see 9.5 above) the scoring for Landform: L1/L3 Type 1 or 2; Archaeological traces: A3 Type 1, and Site attributes: Classes 1-7 Type 1, all denote a generally low archaeological significance, even though the density of artefacts is usually relatively high.

There was no marked variance in density or context of artefacts that would definitively favour one alternative over another in terms of solar field location, but a possibly higher typological consistency noted to the south and south west of the small pan may favour solar field location alternative 1 (upper part of site).

2) No Later Stone Age sites were noted in the areas of proposed site alternatives nor were any rock engravings found or likely to be found owing to the lack of outcropping andesite or dolerite.



Figure 1: Random view of an artefact-strewn surface



Figure 2: View across the lower part of the site



Figure 3: MSA artefacts south east of small pan



Figure 4: MSA artefacts showing variety of raw materials

9.8.2 Colonial era heritage

No colonial era heritage features were found other than a borrow pit excavated for the construction of the adjacent Douglas-Prieska road. No significant features and no graves were noted.

9.8.3 Sense of place, visual impacts and scenic routes

The desktop prediction that the area was not likely to be sensitive from a touristic point of view was not contradicted by experience of the landscape during the site visit. Nearby areas have been impacted by twentieth century agricultural and infrastructural interventions including roads, powerlines, bridges, weir, substation and landscape-altering farming activity.

9.9 ASSESSMENT OF IMPACTS

Heritage resources including archaeological sites are in each instance unique and non-renewable resources. Area and linear developments such as those envisaged can have a permanent destructive impact on these resources. The objective of the EIA is to assess the sensitivity of such resources where present, to evaluate the significance of potential impacts on these resources and, if and where appropriate, to recommend no-go areas and measures to mitigate or manage said impacts.

In the case of the Douglas solar field and associated infrastructure, the power lines and any access roads represent potential linear impacts. The destructive impacts that are possible in terms of heritage resources would tend to be direct, once-off events occurring during the initial construction period. In the long term, the proximity of operations in a given area could result in secondary indirect impacts resulting from the movement of people or vehicles in the immediate or surrounding vicinity. With respect to the magnitude and extent of potential impacts, it has been noted that the erection of power lines would have a relatively small impact on Stone Age sites, in light of Sampson's (1985) observations during surveys beneath power lines in the Karoo (actual modification of the landscape tends to be limited to the footprint of each pylon), whereas a road or a water supply pipeline would tend to be far more destructive (modification of the landscape surface would be within a continuous strip), albeit relatively limited in spatial extent, i.e. width (Sampson compares such destruction to the pulling out of a thread from an ancient tapestry).

The study has shown that the extent of the impacts of the proposed Douglas solar energy facility on the archaeological landscape as a whole is likely to low (negative) (refer to Table 9-1). Consideration of alternatives is given in 9.11, below, but in summary, for solar field location, this study suggests a slight preference for alternative 1 (upper part of the site) because of higher typological integrity of Stone Age remains south and south east of the small pan (see Figure 8). From an archaeological point of view there are no strong reasons for favouring one or another of the other alternatives, i.e. location of associated buildings or options for electrical connection.

There is the possibility of encountering archaeological remains during excavation for the solar panels installation (e.g. CPV system) and underground cables within the solar facility, for example, but this is also likely to be low impact significance.

It is maintained that the proposed development of the Douglas solar energy facility will not have an impact of great significance on potential archaeological remains that might be encountered during the construction phase of the proposed project.

Nature of the Impact	Status	Extent	Duration	Intensity	Probability	Significance Without mitigation	Mitigation	Significance with mitigation	Confidence
Destruction or disturbance of archaeological sites. (See 9.8.1) This may result from any disturbance of surfaces during construction, operational or closure phases. (See 9.7.4)	Negative	Local	Permanent	Low	Improbable	Low	No mitigation is expected to be required. (See Table 9-2) This study suggests that Alternative 1 (upper part of site) for solar field location would be preferable (See 9.11.1)	Low	High
							No mitigation is required for electrical connection alternatives (See 9.11.2)		
Possible unanticipated destruction or disturbance of significant sub-surface features, e.g. precolonial grave or ostrich eggshell cache not located during AIA (see 9.2.2)	Negative	Local	Permanent	Low	Improbable	Unknown, subject to assessment if found.	May be required (See Table 9-2) In the event of any such feature being found during any phase of the development it should be reported to relevant heritage authorities so that appropriate mitigation needs may be evaluated.	Unknown, depending on nature and significance of resource if found.	Medium
Destruction or disturbance of colonial era sites. (See 9.8.2)	Negative	Local	Permanent	Low	Improbable	Low	No mitigation required	Low	High

Table 9-1Douglas solar energy farm: Summary of impacts to archaeological assets

Impact on sense of	Negative	Local	Long term	Medium	Probable	Low	Parts of the local	Low	Medium
place, visual impacts							landscape already		
and scenic routes							impacted by		
							infrastructure and		
(see 9.8.3)							agricultural interventions		
							(see 9.8.3)		

Table 9-2	Douglas solar energy farm: Mitigation and monitoring
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Impact	Mitigation objectives	Mitigation/ Management action	Monitoring		
Construction or operations phase: In the event	Mitigate unexpected uncovering, disturbance or	Alert relevant heritage authority in the event of finding any feature during	Methodology Alert heritage	Frequency In the event of	Responsibility Project
that any unanticipated heritage feature is uncovered during construction or operation (including any possible expansion of the facilities).	destruction of archaeological resources, e.g. burial or feature.	construction or operation. Assess in the event of any expansion or possible impact beyond the area covered by this report.	authority and mitigate if deemed necessary.	unexpected uncovering of feature.	construction/ operation team

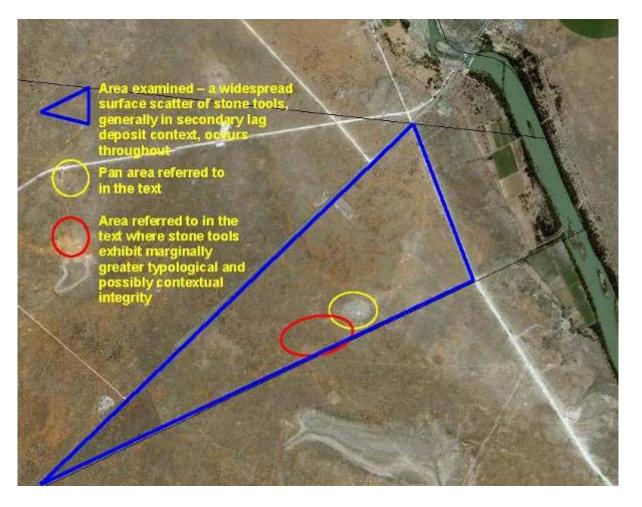


Figure 5: Sensitivity map including all relevant archaeological/heritage impacts

9.10 REVERSIBILITY OF IMPACTS AND IRREPLACEABILITY OF RESOURCE LOSS

In all cases the impacts on the physical heritage resources of the past considered here, both colonial (found to be minimal) and precolonial (occurring throughout as an often relatively dense surface scatter in derived or secondary context, but with marginally higher typological integrity noted in one zone south of the pan) would be both **non-reversible** and **irreplaceable**.

9.11 ASSESSMENT OF ALTERNATIVES

9.11.1 Solar field layout alternative

In terms of solar field location, there are 2 alternatives: (1) the upper part of the site and (2) the lower part of the site. There is to this date no preferred alternative and therefore both alternatives weigh as much in the EIA report.

This study suggests that on account of higher typological integrity of stone artefacts south of the small pan on the property, alternative 1, i.e. situating the solar field in the upper part of the site, would be preferred from an archaeological perspective.

9.11.2 Location of associated buildings

Alternatives for the location of associated buildings (O&M buildings) have been suggested at (1) upper part of the site north corner, (2) upper part of the site south corner and (3) lower part of the site.

Preference given in this study would be any of the localities suitable for a solar field layout as indicated in 9.11.1, i.e. in the upper part of the site.

9.11.3 Electrical connection to existing grid alternatives

Alternatives for electrical connection of the solar facility to the existing grid are: (1) loop connection (approx. 500 m long) into the existing 132 kV Ovaal-Disselfontein transmission power line that feeds into the Ovaal Pump substation located approximately 2 km north-east of the site; (2) new 132 kV line (approx. 3 km long) running parallel to the existing Ovaal-Disselfontein transmission power line with an on-site substation located at the bottom-right corner of the proposed Douglas site; and (3) new 132 kV line (approx. 1.5 km long) running parallel to the R 357 road (over the existing bridge) with a on-site substation located at the top-right corner of the proposed Douglas site.

This study does not suggest reasons for favouring any one of these alternatives over any other. No mitigation is recommended as necessary.

9.12 CUMULATIVE IMPACTS

The likely impact of the proposed development on archaeological resources is anticipated to take place mainly as a once-off permanent impact during any disturbances of the current land surfaces in the construction phase with relatively minimal impact thereafter. However, in the event of future expansion or increased traversing of the surrounding terrain as a result of the development, further impacts are possible.

9.13 CONCLUSION AND RECOMMENDATIONS

In terms of archaeological traces, the entire area of proposed development on Roodekop No 5 Portion 1 is strewn with variable densities of stone artefacts, mainly of Middle Stone Age character but representing a palimpsest of derived material of probably differing age. Relative to archaeological significance matrices (set out in 9.5 above), scores suggest generally low significance, even though the density of artefacts is often relatively high.

In addressing alternatives for solar field location, no marked variance in density or context of artefacts definitively favours one alternative over another. However a perceived higher typological consistency noted amongst artefacts to the south and south west of the small pan (Figure 5) may favour solar field location alternative 1 (upper part of site).

9.13.1 Recommendations

Generally low significance given to the archaeological traces documented in this study indicates that implementation may proceed without mitigation but with the following provision with respect to alternatives:

For solar field location, this study suggests that alternative 1 (upper part of site) would be marginally preferable.

For the location of associated buildings (O&M buildings), this study approves, from an archaeological perspective, any of the alternatives proposed for solar field location in the upper part of the site.

For electrical connection, this study finds that any one of the proposed alternatives may be implemented without any mitigation being necessary.

In the event that any unanticipated heritage feature is uncovered during construction or operation phases of the project, alert the relevant heritage authority and mitigate if deemed necessary.

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APPENDIX 1: CONVENTIONS USED TO DETERMINE THE SIGNIFICANCE OF CULTURAL HERITAGE RESOURCES

The following criteria are applied for determining archaeological significance based on field survey of material culture traces in the landscape (*relevant for field assessment as yet to be carried out for the present project*):

In addition to guidelines provided by the National Heritage Resources Act (Act No. 25 of 1999), a set of criteria based on Deacon (nd) and Whitelaw (1997) for assessing archaeological significance has been developed for Northern Cape settings (Morris 2000). These criteria include estimation of landform potential (in terms of its capacity to contain archaeological traces) and assessing the value to any archaeological traces (in terms of their attributes or their capacity to be construed as evidence, given that evidence is not given but constructed by the investigator).

Estimating site potential

Table 1 (below) is a classification of landforms and visible archaeological traces used for estimating the potential of archaeological sites (after J. Deacon nd, National Monuments Council). Type 3 sites tend to be those with higher archaeological potential, but there are notable exceptions to this rule, for example the renowned rock engravings site Driekopseiland near Kimberley which is on landform L1 Type 1 - normally a setting of lowest expected potential. It should also be noted that, generally, the older a site the poorer the preservation, so that sometimes any trace, even of only Type 1 quality, can be of exceptional significance. In light of this, estimation of potential will always be a matter for archaeological observation and interpretation.

Assessing site value by attribute

Table 2 is adapted from Whitelaw (1997), who developed an approach for selecting sites meriting heritage recognition status in KwaZulu-Natal. It is a means of judging a site's archaeological value by ranking the relative strengths of a range of attributes (given in the second column of the table). While aspects of this matrix remain qualitative, attribute assessment is a good indicator of the general archaeological significance of a site, with Type 3 attributes being those of highest significance.

Table 1. Classification of landforms and visible archaeological traces for estimating the potential for

archaeological sites (after J. Deacon, National Monuments Council).

Class	Landform	Туре 1	Туре 2	Туре 3	
L1	Rocky surface	Bedrock exposed	Some soil patches	Sandy/grassy patches	
L2	Ploughed land	Far from water	In floodplain	On old river terrace	
L3	Sandy ground, inland	Far from water	In floodplain or near feature such as hill	On old river terrace	
L4	Sandy ground, Coastal	>1 km from sea	Inland of dune cordon	Near rocky shore	
L5	Water-logged deposit	Heavily vegetated	Running water	Sedimentary basin	
L6	Developed urban	Heavily built-up with no known record of early settlement	Known early settlement, but buildings have basements	Buildings without extensive basements over known historical sites	
L7	Lime/dolomite	>5 myrs	<5000 yrs	Between 5000 yrs and 5 myrs	

Class	Landform	Type 1	Туре 2	Туре 3
L8	Rock shelter	Rocky floor	Sloping floor or small	Flat floor, high ceiling
			area	
Class	Archaeo-logical	Type 1	Type 2	Туре 3
	traces			
A1	Area previously	Little deposit	More than half deposit	High profile site
	excavated	remaining	remaining	
A2	Shell or bones	Dispersed scatter	Deposit <0.5 m thick	Deposit >0.5 m thick;
	visible			shell and bone dense
A3	Stone artefacts	Dispersed scatter	Deposit <0.5 m thick	Deposit >0.5 m thick
	or stone walling			
	or other feature			
	visible			

Table 2. Site attributes and value assessment (adapted from Whitelaw 1997)

Class	Attribute	Type 1	Type 2	Туре 3
1	Length of sequence/context	No sequence Poor context Dispersed distribution	Limited sequence	Long sequence Favourable context High density of arte/ecofacts
2	Presence of exceptional items (incl regional rarity)	Absent	Present	Major element
3	Organic preservation	Absent	Present	Major element
4	Potential for future archaeological investigation	Low	Medium	High
5	Potential for public display	Low	Medium	High
6	Aesthetic appeal	Low	Medium	High
7	Potential for implementation of a long-term management plan	Low	Medium	High

APPENDIX 2: CONVENTIONS USED TO IDENTIFY POTENTIAL RISKS/ IMPACTS OR "NO-GO AREAS" ON HERITAGE RESOURCES

The following criteria can be applied for determining overall significance:

These criteria for description and assessment of environmental impacts are drawn from the EIA Regulations, published by the Department of Environmental Affairs and Tourism (April 1998) in terms of the National Environmental Management Act, 1998 (Act No.107 of 1998).

9.14.1 Potential Impact

This is an appraisal of the type of effect the proposed activity would have on the affected environmental component. Its description should include what is being affected and how it is being affected. *9.14.2*

9.14.3 Extent

The physical and spatial scale of the impact is classified as:

Local:	The impacted area extends only as far as the activity, e.g. a footprint.
Site:	The impact could affect the whole, or a measurable portion of the site.
Regional:	The impact could affect the area including the neighbouring farms, the transport routes and the adjoining towns.

9.14.4 Duration

The lifetime of the impact, which is measured in relation to the lifetime of the proposed base.

Short term:	The impact will either disappear with mitigation or will be mitigated through a natural process in a period shorter than any of the phases.
Medium term:	The impact will last up to the end of the phases, where after it will be entirely negated.
Long term:	The impact will continue or last for the entire operational lifetime of the Development, but will be mitigated by direct human action or by natural processes thereafter.
Permanent:	This is the only class of impact, which will be non-transitory. Mitigation either by man or natural process will not occur in such a way or in such a time span that the impact can be considered transient.

(Impacts on heritage and archaeological resources may be mitigated and hence classed as 'Short term' but the original in situ context is usually altered in a 'Permanent' way. If the archaeological or heritage significance of the resources in question is considered to be low then the significance of the permanent loss is **low**).

9.14.5 Intensity

The intensity of the impact is considered here by examining whether the impact is destructive or benign, whether it destroys the impacted environment, alters its functioning, or slightly alters the environment itself. These are rated as:

- Low: The impact alters the affected environment in such a way that the natural processes or functions are not affected. Medium: The affected environment is altered, but functions and processes continue, albeit in a
- Medium: The affected environment is altered, but functions and processes continue, albeit in a modified way.
- High:Function or process of the affected environment is disturbed to the extent where it
temporarily or permanently ceases.

This will be a relative evaluation within the context of all the activities and the other impacts within the framework of the project.

(Archaeological and heritage resources being non-renewable, the intensity of any direct impact would be high by definition but this evaluation would again be ameliorated by the significance attached to the particular resources in question). 9.14.6

9.14.7 Probability

This describes the likelihood of the impacts actually occurring. The impact may occur for any length of time during the life cycle of the activity, and not at any given time. The classes are rated as follows:

Improbable:	The possibility of the impact occurring is none, due either to the circumstances, design or experience.
Possible:	The possibility of the impact occurring is very low, due either to the circumstances, design or experience.
Likely:	There is a possibility that the impact will occur to the extent that provisions must therefore be made.
Highly Likely:	It is most likely that the impacts will occur at some stage of the Development. Plans must be drawn up before carrying out the activity.
Definite:	The impact will take place regardless of any prevention plans, and only mitigation actions or contingency plans to contain the effect can be relied on.

9.14.8 Determination of Significance – Without Mitigation

Significance is determined through a synthesis of impact characteristics, and is an indication of the importance of the impact in terms of both physical extent and time scale. The significance of the impact "without mitigation" is the prime determinant of the nature and degree of mitigation required. Where the impact is positive, significance is noted as "positive". Significance is rated on the following scale:

No significance: Low: Medium:	The impact is not substantial and does not require any mitigation action. The impact is of little importance, but may require limited mitigation. The impact is of importance and is therefore considered to have a negative
	impact. Mitigation is required to reduce the negative impacts to acceptable levels.
High:	The impact is of great importance. Failure to mitigate, with the objective of reducing the impact to acceptable levels, could render the entire development option or entire project proposal unacceptable. Mitigation is therefore essential.
0140	

9.14.9

9.14.10 Determination of Significance – With Mitigation

Significance is determined through a synthesis of impact characteristics. It is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. In this case the prediction refers to the foreseeable significance of the impact after the successful implementation of the suggested mitigation measures. Significance with mitigation is rated on the following scale:

No significance:	The impact will be mitigated to the point where it is regarded to be insubstantial.
Low:	The impact will be mitigated to the point where it is of limited importance.
Low to medium:	The impact is of importance, however, through the implementation of the correct mitigation measures such potential impacts can be reduced to acceptable levels.
Medium:	Notwithstanding the successful implementation of the mitigation measures, to reduce the negative impacts to acceptable levels, the negative impact will remain of significance. However, taken within the overall context of the project, the persistent impact does not constitute a fatal flaw.
Medium to high:	The impact is of great importance. Through implementing the correct mitigation measures the negative impacts will be reduced to acceptable levels.
High:	The impact is of great importance. Mitigation of the impact is not possible on a cost-effective basis. The impact continues to be of great importance, and, taken within the overall context of the project, is considered to be a fatal flaw in the project proposal. This could render the entire development option or entire project proposal unacceptable.

APPENDIX 3. RELEVANT LEGISLATION

Extracts from the

National Heritage Resources Act (No 25 of 1999)

DEFINITIONS

Section 2

In this Act, unless the context requires otherwise:

- ii. "Archaeological" means
 - a) material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures;
 - b) rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10 m of such representation;
 - c) wrecks, being any vessel or aircraft, or any part thereof, which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the Republic,... and any cargo, debris, or artefacts found or associated therewith, which is older than 60 years or which SAHRA considers to be worthy of conservation.
- viii. "Development" means any physical intervention, excavation or action, other than those caused by natural forces, which may in the opinion of a heritage authority in any way result in a change to the nature, appearance or physical nature of a place, or influence its stability and future wellbeing, including –
 - a) construction, alteration, demolition, removal or change of use of a place or structure at a place;
 - b) carrying out any works on or over or under a place;
 - c) subdivision or consolidation of land comprising, a place, including the structures or airspace of a place;
 - d) constructing or putting up for display signs or hoardings;
 - e) any change to the natural or existing condition or topography of land; and
 - f) any removal or destruction of trees, or removal of vegetation or topsoil;
- xiii. "*Grave*" means a place of interment and includes the contents, headstone or other marker of such a place, and any other structure on or associated with such place;
- xxi. "Living heritage" means the intangible aspects of inherited culture, and may include
 - a) cultural tradition;
 - b) oral history;
 - c) performance;
 - d) ritual;
 - e) popular memory;
 - f) skills and techniques;
 - g) indigenous knowledge systems; and
 - h) the holistic approach to nature, society and social relationships.
- xxxi. *"Palaeontological"* means any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trance;
- xli. "Site" means any area of land, including land covered by water, and including any structures or objects thereon;
- xliv. "Structure" means any building, works, device or other facility made by people and which is fixed to land, and includes any fixtures, fittings and equipment associated therewith;

NATIONAL ESTATE Section 3

- 1) For the purposes of this Act, those heritage resources of South Africa which are of cultural significance or other special value for the present community and for future generations must be considered part of the national estate and fall within the sphere of operations of heritage resources authorities.
- 2) Without limiting the generality of subsection 1), the national estate may include
 - a) places, buildings, structures and equipment of cultural significance;
 - b) places to which oral traditions are attached or which are associated with living heritage;
 - c) historical settlements and townscapes;
 - d) landscapes and natural features of cultural significance;
 - e) geological sites of scientific or cultural importance
 - f) archaeological and palaeontological sites;
 - g) graves and burial grounds, including
 - i. ancestral graves;
 - ii. royal graves and graves of traditional leaders;
 - iii. graves of victims of conflict
 - iv. graves of individuals designated by the Minister by notice in the Gazette;
 - v. historical graves and cemeteries; and
 - vi. other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No 65 of 1983)
 - h) sites of significance relating to the history of slavery in South Africa;
 - i) movable objects, including -
 - objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens;
 - ii. objects to which oral traditions are attached or which are associated with living heritage;
 - iii. ethnographic art and objects;
 - iv. military objects;
 - v. objects of decorative or fine art;
 - vi. objects of scientific or technological interest; and
 - vii. books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1 xiv) of the National Archives of South Africa Act, 1996 (Act No 43 of 1996).

STRUCTURES

Section 34

1) No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.

ARCHAEOLOGY, PALAEONTOLOGY AND METEORITES Section 35

- 3) Any person who discovers archaeological or palaeontological objects or material or a meteorite in the course of development or agricultural activity must immediately report the find to the responsible heritage resources authority, or to the nearest local authority offices or museum, which must immediately notify such heritage resources authority.
- 4) No person may, without a permit issued by the responsible heritage resources authority -

- a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
- b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;
- c) trade in, sell for private gain, export or attempt to export from the Republic any category of archaeological or palaeontological material or object, or any meteorite; or
- d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assists in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.
- 5) When the responsible heritage resources authority has reasonable cause to believe that any activity or development which will destroy, damage or alter any archaeological or palaeontological site is under way, and where no application for a permit has been submitted and no heritage resources management procedure in terms of section 38 has been followed, it may
 - a) serve on the owner or occupier of the site or on the person undertaking such development an order for the development to cease immediately for such period as is specified in the order;
 - b) carry out an investigation for the purpose of obtaining information on whether or not an archaeological or palaeontological site exists and whether mitigation is necessary;
 - c) if mitigation is deemed by the heritage resources authority to be necessary, assist the person on whom the order has been served under paragraph a) to apply for a permit as required in subsection 4); and
 - d) recover the costs of such investigation from the owner or occupier of the land on which it is believed an archaeological or palaeontological site is located or from the person proposing to undertake the development if no application for a permit is received within two weeks of the order being served.
- 6) The responsible heritage resources authority may, after consultation with the owner of the land on which an archaeological or palaeontological site or meteorite is situated, serve a notice on the owner or any other controlling authority, to prevent activities within a specified distance from such site or meteorite.

BURIAL GROUNDS AND GRAVES Section 36

- 3) No person may, without a permit issued by SAHRA or a provincial heritage resources authority
 - a) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;
 - b) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or
 - c) bring onto or use at a burial ground or grave referred to in paragraph a) or b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.
- 4) SAHRA or a provincial heritage resources authority may not issue a permit for the destruction of any burial ground or grave referred to in subsection 3a) unless it is satisfied that the applicant has made satisfactory arrangements for the exhumation and re-interment of the contents of such graves, at the cost of the applicant and in accordance with any regulations made by the responsible heritage resources authority.
- 5) SAHRA or a provincial heritage resources authority may not issue a permit for any activity under subsection 3b) unless it is satisfied that the applicant has, in accordance with regulations made by the responsible heritage resources authority –

- a) made a concerted effort to contact and consult communities and individuals who by tradition have an interest in such grave or burial ground; and
- b) reached agreements with such communities and individuals regarding the future of such grave or burial ground.
- 6) Subject to the provision of any other law, any person who in the course of development or any other activity discovers the location of a grave, the existence of which was previously unknown, must immediately cease such activity and report the discovery to the responsible heritage resources authority which must, in co-operation with the South African Police Service and in accordance with regulations of the responsible heritage resources authority
 - a) carry out an investigation for the purpose of obtaining information on whether or not such grave is protected in terms of this Act or is of significance to any community; and
 - b) if such grave is protected or is of significance, assist any person who or community which is a direct descendant to make arrangements for the exhumation and reinternment of the contents of such grave or, in the absence of such person or community, make any such arrangements as it deems fit.

HERITAGE RESOURCES MANAGEMENT Section 38

- 1) Subject to the provisions of subsections 7), 8) and 9), any person who intends to undertake a development categorised as
 - a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length;
 - b) the construction of a bridge or similar structure exceeding 50 m in length;
 - c) any development or other activity which will change the character of a site
 - i. exceeding 5 000 m² in extent; or
 - ii. involving three or more existing erven or subdivisions thereof; or
 - iii. involving three or more erven or subdivisions thereof which have been consolidated within the past five years; or
 - iv. the costs which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
 - d) the rezoning of a site exceeding 10 000 m^2 in extent; or
 - e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority,

must at the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.

- 2) The responsible heritage resources authority must, within 14 days of receipt of a notification in terms of subsection 1)
 - a) if there is reason to believe that heritage resources will be affected by such development, notify the person who intends to undertake the development to submit an impact assessment report. Such report must be compiled at the cost of the person proposing the development, by a person or persons approved by the responsible heritage resources authority with relevant qualifications and experience and professional standing in heritage resources management; or
 - b) notify the person concerned that this section does not apply.
- 3) The responsible heritage resources authority must specify the information to be provided in a report required in terms of subsection 2a) ...
- 4) The report must be considered timeously by the responsible heritage resources authority which must, after consultation with the person proposing the development decide
 - a) whether or not the development may proceed;
 - b) any limitations or conditions to be applied to the development;

- c) what general protections in terms of this Act apply, and what formal protections may be applied, to such heritage resources;
- d) whether compensatory action is required in respect of any heritage resources damaged or destroyed as a result of the development; and
- e) whether the appointment of specialists is required as a condition of approval of the proposal.

APPOINTMENT AND POWERS OF HERITAGE INSPECTORS Section 50

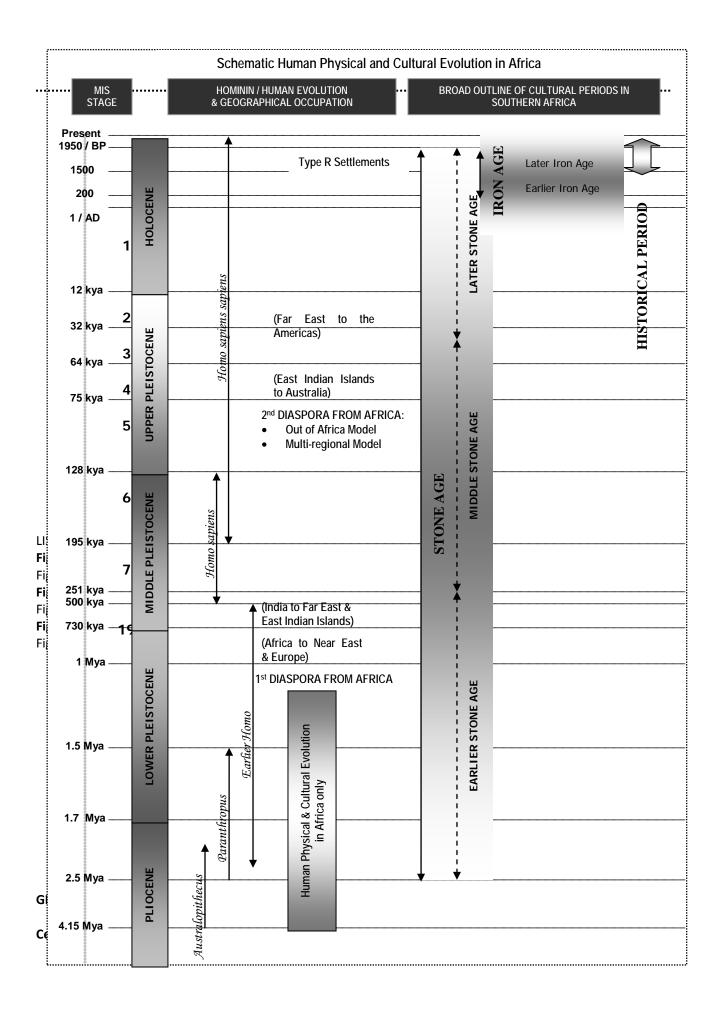
- 7) Subject to the provision of any other law, a heritage inspector or any other person authorised by a heritage resources authority in writing, may at all reasonable times enter upon any land or premises for the purpose of inspecting any heritage resource protected in terms of the provisions of this Act, or any other property in respect of which the heritage resources authority is exercising its functions and powers in terms of this Act, and may take photographs, make measurements and sketches and use any other means of recording information necessary for the purposes of this Act.
- 8) A heritage inspector may at any time inspect work being done under a permit issued in terms of this Act and may for that purpose at all reasonable times enter any place protected in terms of this Act.
- 9) Where a heritage inspector has reasonable grounds to suspect that an offence in terms of this Act has been, is being, or is about to be committed, the heritage inspector may with such assistance as he or she thinks necessary
 - a) enter and search any place, premises, vehicle, vessel or craft, and for that purpose stop and detain any vehicle, vessel or craft, in or on which the heritage inspector believes, on reasonable grounds, there is evidence related to that offence;
 - b) confiscate and detain any heritage resource or evidence concerned with the commission of the offence pending any further order from the responsible heritage resources authority; and
 - c) take such action as is reasonably necessary to prevent the commission of an offence in terms of this Act.

A heritage inspector may, if there is reason to believe that any work is being done or any action is being taken in contravention of this Act or the conditions of a permit issued in terms of this Act, order the immediate cessation of such work or action pending any further order from the responsible heritage resources authority.

APPENDIX 4. ILLUSTRATIONS / MAPS

Maps based on Google Earth and with property definition as supplied have been included in the text above.

Appended below is a schematic time line of human physical and cultural evolution in Africa.



Colonial era – equates with 'Historical Period' in the above chart, essentially post-1500 and referring to initially non-indigenous material culture and evolving local forms.

Later Stone Age (LSA)– the most recent of the major heuristic subdivisions of the Stone Age in South Africa (see chart above). Continuities have been pointed out between some features of Later Stone Age technology and behaviour and the historically documented material and lived culture of the Khoe-San. Ceramic Later Stone Age – Later Stone Age (see below) sites with pottery.

MSA – **Middle Stone Age** – one of the major heuristic subdivisions of the Stone Age in South Africa (see chart above).

Pleistocene – a subdivision of geological time preceding the current Holocene epoch.

Precolonial – pre-1500 indigenous material culture and history, often interdigitating with colonial era features (e.g. Type R settlements which were probably contemporary with European colonisation of the Cape but preceded the frontier advance in the interior).

Rock engravings – a subset of South Africa's heritage of rock art, also known as petroglyphs, typically occurring on exposed rocky hilltops in the central interior of the country.