

**A LETTER OF RECOMMENDATION (WITH CONDITIONS) FOR THE EXEMPTION OF A FULL PHASE 1 ARCHAEOLOGICAL IMPACT ASSESSMENT FOR THE PROPOSED ESTABLISHMENT OF 12 HOLIDAY HOMES ON PORTION 3 OF FARM 695, (CLIPPETY CLOP), ADJACENT TO THE KWELERA RIVER, GREAT KEI MUNICIPALITY, AMATHOLE DISTRICT MUNICIPALITY, EASTERN CAPE PROVINCE**

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## **PROJECT INFORMATION**

### **The type of development**

The proposed development include the establishment of up to 12 holiday homes with services and infrastructure will be situated above the 100 year flood line for the Kwelera River. Each holiday home will have a footprint of approximately 120 square metres. The total size of the property is approximately 28 hectares and the development will comprises only one hectare and the remaining 27 hectares will remain a nature conservation area.

### **The Developer**

Clippety Clop Property Holdings cc

### **The Consultant**

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## **TERMS OF REFERENCE**

The original proposal was to conduct a Phase 1 Archaeological Heritage Impact Assessment (AIA) of the proposed establishment of 12 holiday homes on Portion 3 of Farm 695, 'Clippety Clop', adjacent to the Kwelera River, Great Kei Municipality, Amathola District Municipality, Eastern Cape Province; to describe and evaluate the importance of possible archaeological heritage sites, the potential impact of the development and to make recommendations to minimize possible damage to these sites.

## **DESCRIPTION OF THE PROPERTY**

**Map:** 1:50 000 – 3228CC Gonubie

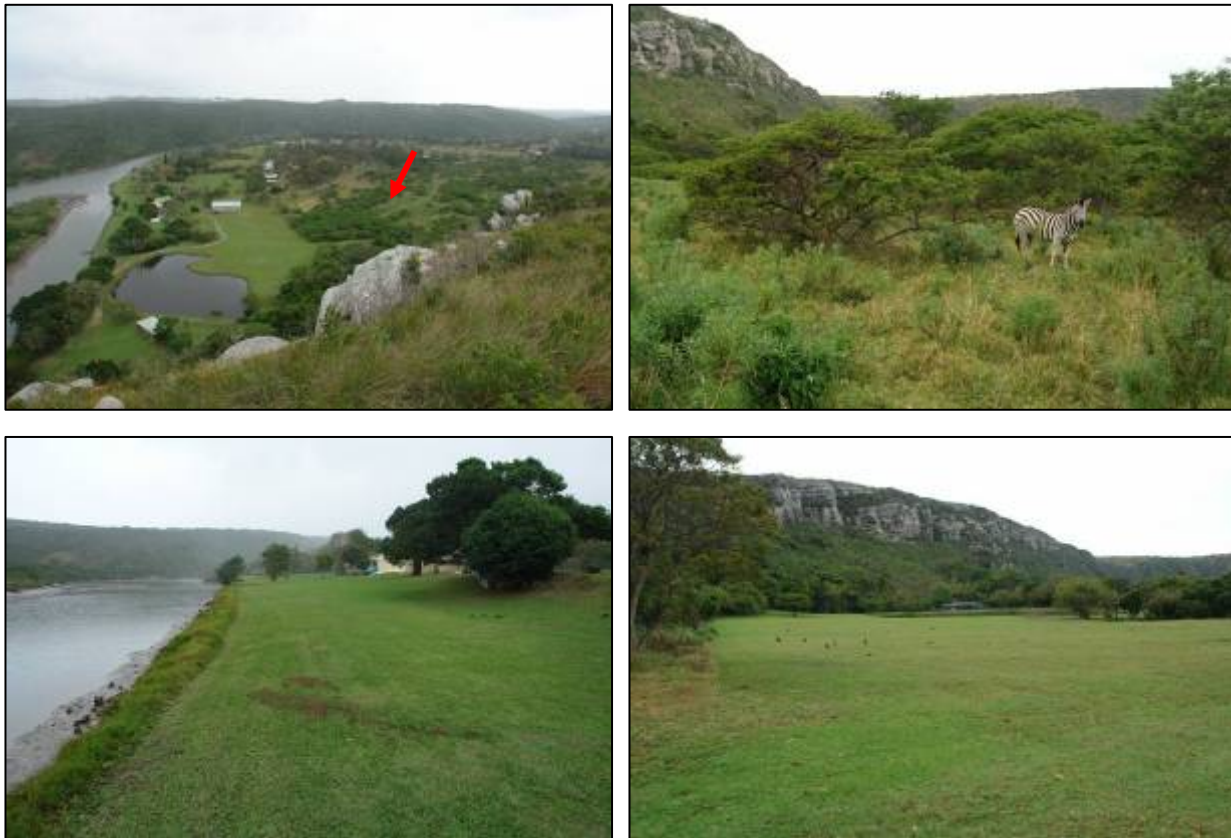
### **Location data**

The proposed establishment of 12 holiday homes on Portion 3 of Farm 695, 'Clippety Clop', Great Kei Municipality, Amathola District Municipality, Eastern Cape Province, is situated on the eastern embankment of the Kwelera River adjacent to the Arena River Resort (west). It is located some 30 kilometres north-east of East London and approximately three kilometres from the coast (Maps 1-3) (GPS reading at footprint: 32.53.21,36S; 28.03.35,01E).

## ARCHAEOLOGICAL INVESTIGATION

### Methodology and results

The investigation of the whole property was conducted on foot and from a vehicle. GPS readings were taken with a Garmin and all important features were digitally recorded. Apart from small scale developments on the floodplain close to the river (few buildings, a large dam and lawns) the remainder of the property is managed as a nature conservation area and is well stock with game (Figs 1-4). The development will take place on approximately one hectare of land above the 100 year flood line. The property slopes gently upwards from the river in a northerly direction and is covered by dense grass and patches of *Acacia karoo* trees, which made archaeological visibility difficult (Figs 5-10). Nevertheless, it is highly unlikely that any *in situ* archaeological sites/materials are buried below the 100 year flood line. The area above the flood line may have been settled by pre-colonial farming communities in the past (before AD 900). These communities, also known as Early Iron Age mixed farmers, preferred to live close to major water sources (such as large rivers) with arable land to cultivate. In contrast, Middle and Later Iron Age communities would have preferred settlement higher up, on relatively flat hilltops (after AD 900). No archaeological sites/materials were observed associated with these communities during the survey. It would appear that the footprint area has been cleared of bush in the past, and this may have damaged/disturbed archaeological sites/materials if any were present. In general it would appear unlikely that any archaeological remains of any significance will be exposed during the development. There are no buildings older than 60 years or graves on the property.



**Figs 1-4. General views of the Clippety Clop property adjacent to the Kwelera River. The red arrow marks the proposed area for development (top left).**



**Figs 5-10. General views of the proposed footprint. Note the dense vegetation cover.**

### **Conditions**

Although it is unlikely that archaeological remains will be found *in situ*, or of any contextual significance, there is always a possibility that human remains and/or other archaeological and historical material may be uncovered during the development. The property is situated 3 kilometres from the coast, and falls inside the maximum 5 kilometre distance shell middens are expected to be found from the beach. Such material must be reported to the nearest museum, archaeologist or to the South African Heritage Resources Agency (SAHRA) if exposed, so that a systematic and professional investigation can be undertaken. Sufficient time should be allowed to remove/collect such material (See Appendix B for a list of possible archaeological sites that maybe found in the area).

## LETTER OF RECOMMENDATION

It is recommended that the proposed establishment of 12 holiday homes on Portion 3 of Farm 695, 'Clippety Clop', Great Kei Municipality, Amathola District Municipality, Eastern Cape Province, Great Kei Municipality, East London District, is exempted from a full Phase 1 Archaeological Heritage Impact Assessment. The proposed area for development appears to be of low cultural sensitivity and it is unlikely that any archaeological heritage remains will be found on the property. The proposed development may proceed as planned.

Note that this letter of recommendation only exempts the proposed development from a full Phase 1 Archaeological Heritage Impact Assessment, but not for other heritage impact assessments. It must also be clear that this letter of recommendation for exemption of a full Phase 1 archaeological heritage impact assessment will be assessed by the relevant heritage resources authority. The final decision rests with the heritage resources authority, which should give a permit or a formal letter of permission for the destruction of any cultural sites.

The National Heritage Resources Act (Act No. 25 of 1999, section 35) (see Appendix A) requires a full Heritage Impact Assessment (HIA) in order that all heritage resources, that is, all places or objects of aesthetics, architectural, historic, scientific, social, spiritual linguistic or technological value or significance are protected. Thus any assessment should make provision for the protection of all these heritage components, including archaeology, shipwrecks, battlefields, graves, and structures older than 60 years, living heritage, historical settlements, landscapes, geological sites, palaeontological sites and objects.

## GENERAL REMARKS AND CONDITIONS

It must be emphasised that this letter of recommendation for exemption of a full Phase 1 archaeological heritage impact assessment is based on the visibility of archaeological sites/material and may not therefore, reflect the true state of affairs. Sites and material may be covered by soil and vegetation and will only be located once this has been removed. In the unlikely event of such finds being uncovered, (during any phase of construction work), archaeologists must be informed immediately so that they can investigate the importance of the sites and excavate or collect material before it is destroyed (see attached list of possible archaeological sites and material). The *onus* is on the developer to ensure that this agreement is honoured in accordance with the National Heritage Act No. 25 of 1999.

## APPENDIX A: brief legislative requirements

Parts of sections 35(4), 36(3) and 38(1) (8) of the National Heritage Resources Act 25 of 1999 apply:

### *Archaeology, palaeontology and meteorites*

*35 (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;*
- (d) bring onto or use at an archaeological or palaeontological site any excavation equipment or*

*any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects, or use such equipment for the recovery of meteorites.*

***Burial grounds and graves***

36. (3) (a) *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.*

***Heritage resources management***

38. (1) *Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorized as –*

- (a) the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;*
- (b) the construction of a bridge or similar structure exceeding 50m in length;*
- (c) any development or other activity which will change the character of the site –*
  - (i) exceeding 5000m<sup>2</sup> in extent, or*
  - (ii) involving three or more erven or subdivisions thereof; or*
  - (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or*
  - (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA, or a provincial resources authority;*
- (d) the re-zoning of a site exceeding 10 000m<sup>2</sup> in extent; or*
- (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must as 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.*



## **APPENDIX B: IDENTIFICATION OF ARCHAEOLOGICAL FEATURES AND MATERIAL FROM THE SURROUNDING COASTAL AND INLAND AREAS: guidelines and procedures for developers.**

### **Identification of Iron Age archaeological features and material**

- Upper and lower grindstones, broken or complete. Upper grindstone/rubber will be pitted.
- Circular hollows –sunken soil, would indicate storage pits and often associated with grindstones.
- Ash heaps, called middens with cultural remains and food waste such as bone.
- Khaki green soils would indicate kraal areas.
- Baked clay/soil blocks with or without pole impressions marks indicate hut structures.
- Decorated and undecorated pots sherds.
- Iron slag and/or blowpipes indicate iron working.
- Human remains may also be associated with khaki green soils.
- Metal objects and ornaments.

### **Shell middens**

Shell middens can be defined as an accumulation of marine shell deposited by human agents rather than the result of marine activity. The shells are concentrated in a specific locality above the high-water mark and frequently contain stone tools, pottery, bone and occasionally also human remains. Shell middens may be of various sizes and depths, but an accumulation which exceeds 1 square metre in extent should be reported to a museum/archaeologist.

### **Freshwater mussel middens**

Freshwater mussels are found in the muddy banks of rivers and streams and were collected by people in the past as a food resource. Freshwater mussel shell middens are accumulations of mussel shell and are usually found close to rivers and streams. These shell middens frequently contain stone tools, pottery, bone, and occasionally human remains. Shell middens may be of various sizes and depths, but an accumulation which exceeds 1 m<sup>2</sup> in extent, should be reported to an archaeologist.

### **Human skeletal material**

Human remains, whether the complete remains of an individual buried during the past, or scattered human remains resulting from disturbance of the grave, should be reported. In general the remains are buried in a flexed position on their sides, but are also found buried in a sitting position with a flat stone capping or in ceramic pots. Developers are requested to be on alert for these features and remains.

### **Fossil bone**

Fossil bones may be found embedded in deposits at the sites. Any concentrations of bones, whether fossilized or not, should be reported.

### **Stone artefacts**

These are difficult for the layman to identify. However, large accumulations of flaked stones which do not appear to have been disturbed naturally should be reported. If the stone tools are associated with bone remains, development should be halted immediately and archaeologist notified.

### **Stone features and platforms**

These occur in different forms and sizes, but easily identifiable. The most common are an accumulation of roughly circular fire cracked stones tightly spaced and filled in with charcoal and marine shell. They are usually 1-2metres in diameter and may represent cooking platforms for shell fish. Others may resemble circular single row cobble stone markers. These occur in different sizes and may be the remains of wind breaks or cooking shelters.

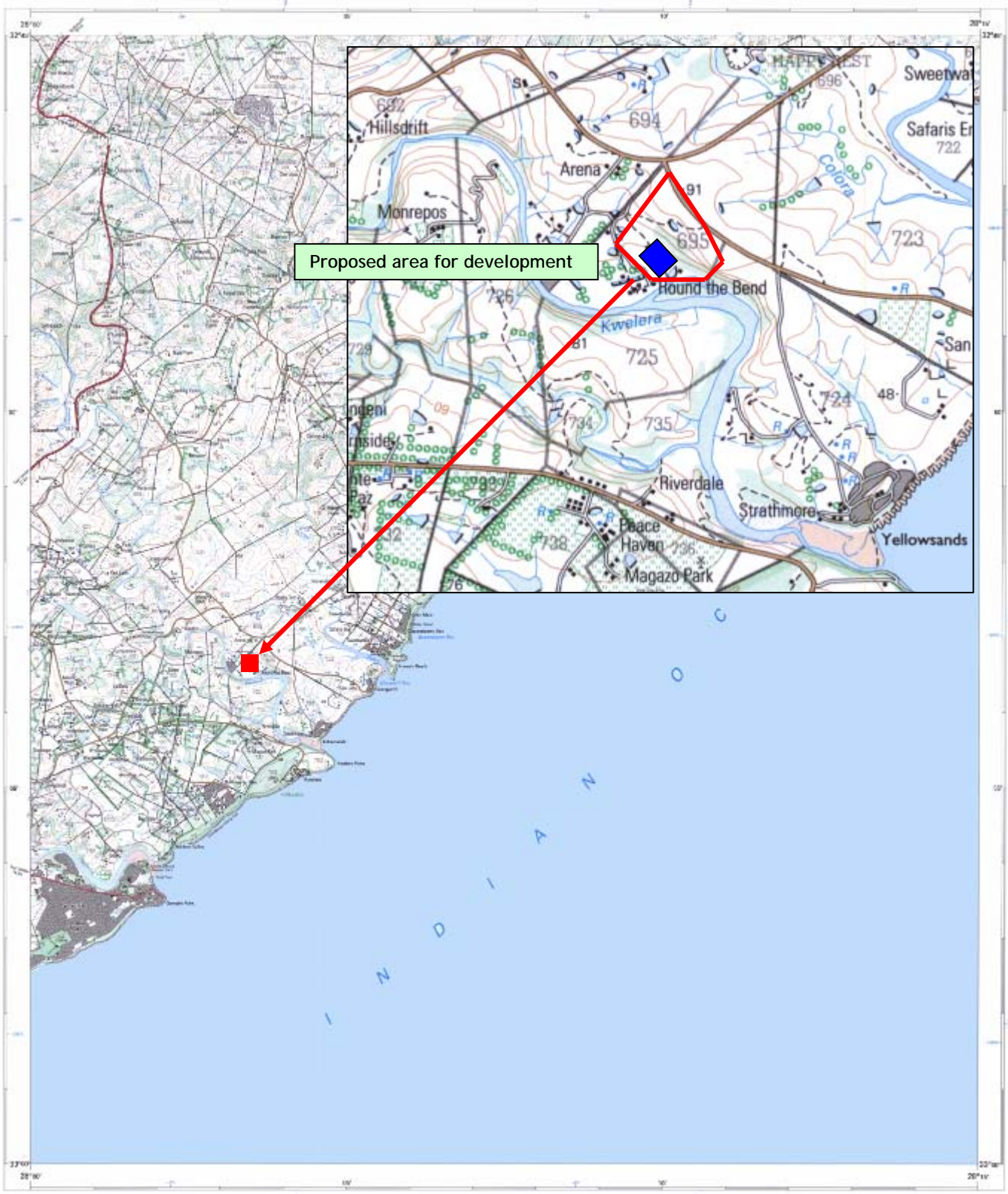
### **Large stone cairns**

The most common cairns consist of large piles of stones of different sizes and heights are known as *isisivane*. They are usually near river and mountain crossings. Their purpose and meaning is not fully understood, however, some are thought to represent burial cairns while others may have symbolic value.

### **Historical artefacts or features**

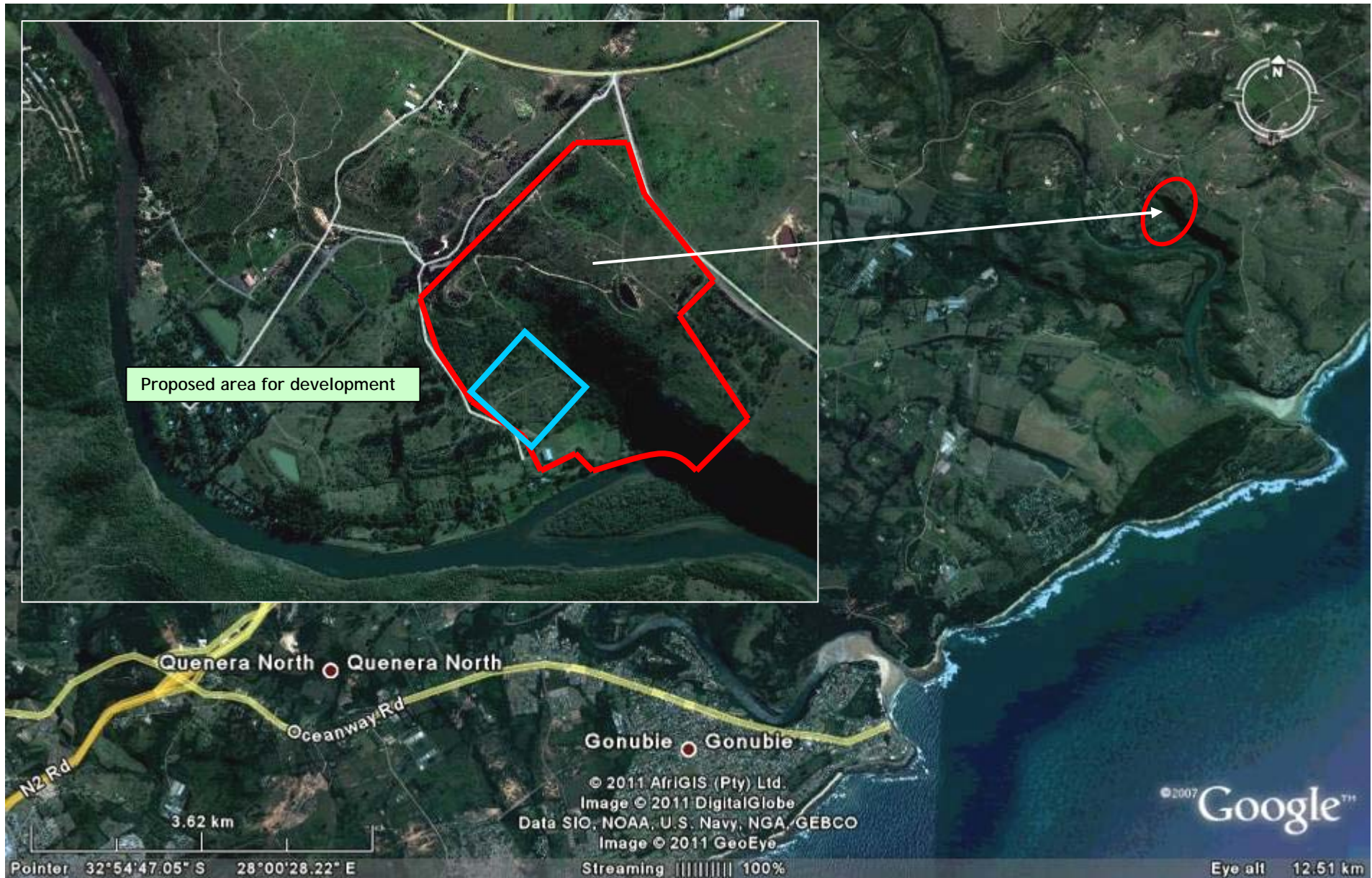
These are easy to identify and include foundations of buildings or other construction features and items from domestic and military activities.





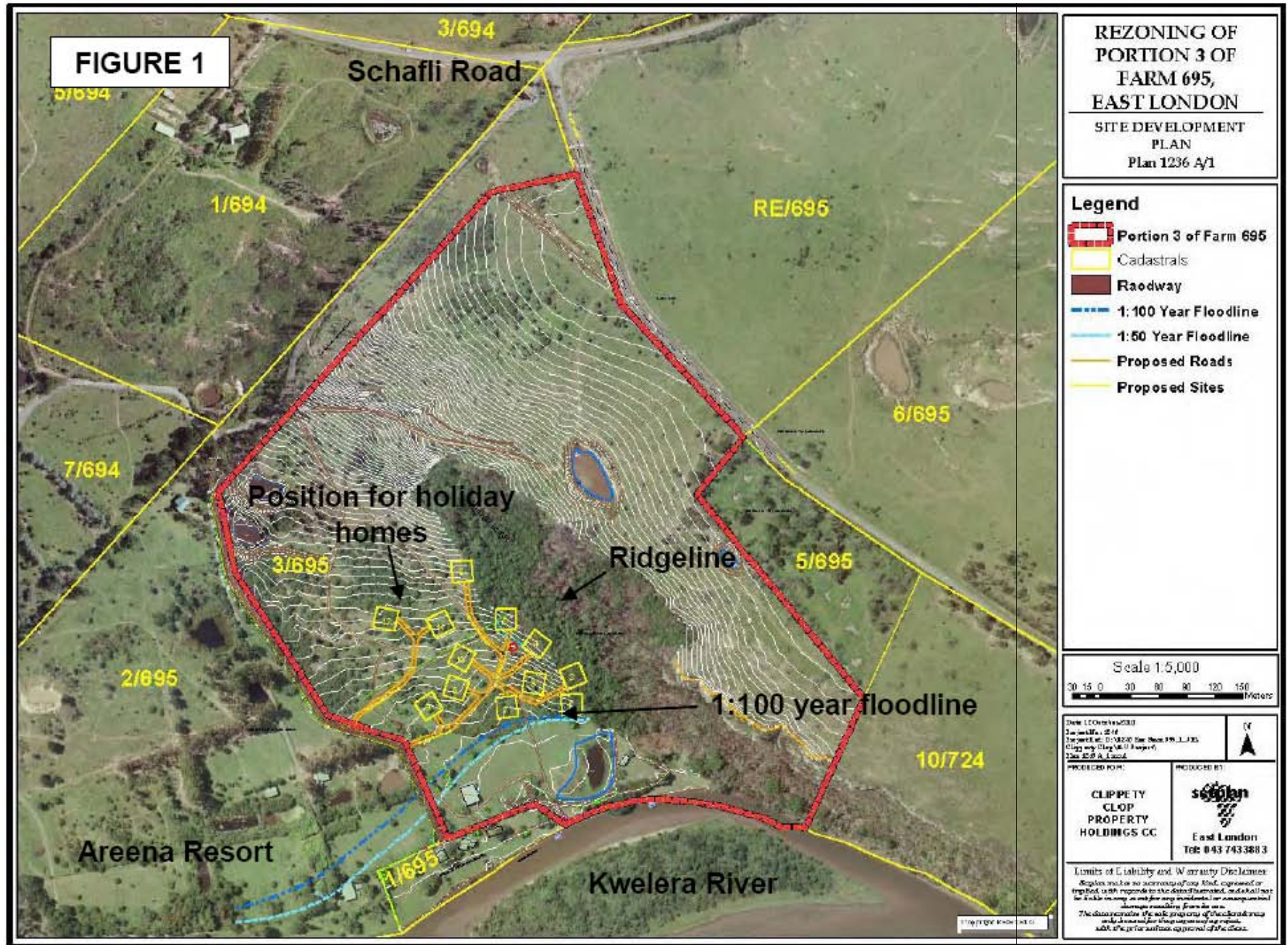
**Map 1. 1:50 000 maps indicating the proposed area for development. The red lines outline the approximate size of the property and the blue block marks the footprint.**





Map 2. Aerial views of the proposed development at the Clippety Clop property. The red lines outline the approximate size of the property and the light blue block marks the footprint.





Map 3. Layout plan of the proposed development at the Clippety Clop property (map courtesy of Terreco Environmental cc).