

**A LETTER OF RECOMMENDATION (WITH CONDITIONS) FOR THE  
EXEMPTION OF A FULL PHASE 1 ARCHAEOLOGICAL IMPACT ASSESSMENT  
FOR THE PROPOSED DEVELOPMENT OF A SOLAR PHOTOVOLTAIC (PV)  
FACILITY ON ERF 77 IN GREENBUSHES, GQEBERHA (PORT ELIZABETH),  
NELSON MANDELA BAY MUNICIPALITY, EASTERN CAPE PROVINCE**



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## **PROJECT INFORMATION**

Eastern Cape Heritage Consultants cc has been appointed by Habitat Link Consulting to conduct a Phase 1 Archaeological Impact Assessment (AIA) for the proposed development of a Solar Photovoltaic (PV) facility on Erf 77 in Greenbushes, Gqeberha (Port Elizabeth), Nelson Mandela Bay Municipality, Eastern Cape Province.

The applicant proposes to develop a new 2.5 megawatt (MW) solar PV facility within the 2.2 hectare (ha) property. The proposed facility, which will consist of approximately 40 solar panels varying from 60 m<sup>2</sup> to 240 m<sup>2</sup> in size, will feed renewable energy to the existing municipal electrical connection via a new mini substation. The development will also consist of several buildings including a meter room, control room, security house and ablution facilities. Stormwater from the site will be diverted to a proposed retention pond in the south-east corner. Access to the site will be obtained off Pennelsdrift Road and a new internal access road will be established along the boundary of the property. Several parking spaces will be allocated near the buildings.

### **Applicant**

Rent - A - Store (Pty) Ltd.

### **Consultant**

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### **Purpose of the study**

The purpose of the study was to conduct a Phase 1 Archaeological Impact Assessment (AIA) for the proposed project and the associated activities, to describe and evaluate:

- the importance of possible archaeological sites, features and materials,
- the potential impact of the development on these resources and,
- to propose recommendations to minimize possible damage to these resources.

### **Site and Location**

The proposed development area is located within the 1:50 000 topographic reference map 3325CD & 3425BA Uitenhage (Map 1). Erf 77 is located approximately 15 kilometres west of the Gqeberha (Port Elizabeth) CBD (Map 2). The proposed development will take place on a relatively flat area covered by dense grass and trees consisting mostly of alien black wattle species (Figure 1). It appears that certain areas within the site have been disturbed in the past by other activities such as an old gravel road. A foundation of a demolished structure was also observed and there is evidence of illegal dumping in the proposed development area. Pennelsdrift Road is adjacent to the southern boundary of the property and Blomme Road is adjacent to the western boundary. General GPS reading: 33.55.260S, 25. 25.518E.

## Relevant Archaeological Impact Assessments

- Binneman, J. 2014. A phase 1 archaeological impact assessment for the proposed integrated residential development and associated infrastructure in the Hunters Retreat area, Port Elizabeth, Nelson Mandela Bay Municipality, Eastern Cape Province. Prepared for CEN Integrated Environmental Management Unit. Port Elizabeth. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Binneman, J. 2011. A phase 1 archaeological heritage impact assessment for the proposed residential development on the remainder of Erf 982, Parsonslei, Port Elizabeth, Nelson Mandela Bay Municipality, Eastern Cape Province. Prepared for CEN Integrated Environmental Management Unit. Port Elizabeth. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Binneman, J. 2010. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological heritage impact assessment for the proposed hard rock (quartzite) quarry on Erf 1, Parsonslei, Port Elizabeth, Nelson Mandela Bay Municipality, Eastern Cape Province. Prepared for Stellenryck Environmental Solutions. Port Elizabeth. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Binneman, J. and Reichert, K. 2021. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological heritage impact assessment for the proposed development of a Solar Photovoltaic (PV) facility on a portion of Erf 1, Parsonslei, Gqeberha within the Nelson Mandela Bay Municipality, Eastern Cape. Prepared for: JG Afrika. Greenacres. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Reichert, K. 2022a. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological heritage impact assessment for the proposed development of Erven 984 and 1134, Parsonslei, Nelson Mandela Bay Municipality, Eastern Cape Province. Prepared for Engineering Advice & Services (Pty) Ltd. Humewood. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Reichert, K. 2022b. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological impact assessment for the proposed expansion of the existing Port Elizabeth Rifle and Pistol Club on Portions 0 and 5 of Erf No. 8 in Greenbushes, Gqeberha (Port Elizabeth). Prepared for BlueLeaf Environmental Consulting (Pty) Ltd. Sunridge Park. Eastern Cape Heritage Consultants cc. Jeffreys Bay.
- Van Ryneveld, K. 2007. Phase 1 archaeological impact assessment. The Hopewell Conservation Project, Greenbushes, Port Elizabeth, South Africa. Prepared for SRK Consulting. Port Elizabeth. Archaeomaps Archaeological Consultancy. Danhof.

## ARCHAEOLOGICAL INVESTIGATION

### Methodology and results

Google aerial images as well as previous heritage reports related to the study area were studied prior to the investigation. The investigation was conducted on foot by an archaeologist. GPS readings were taken with a Garmin and all important features were digitally recorded. The archaeological visibility was poor due to the dense grass and other vegetation but the visibility was better in a gravel road on the property as well as a footpath. No archaeological sites/materials were observed within the study area. In general, the area for the proposed development appears to be of **low archaeological sensitivity** and it is unlikely that any archaeological remains of any significance will be found *in situ* or exposed during the development. There is a foundation of a demolished structure on the property that does not appear to be older than 60 years (Figure 1). There are no known graves on the property.





**Figure 1. General views of the proposed development area on Erf 77 in Greenbushes, Gqeberha (Port Elizabeth), Nelson Mandela Bay Municipality, Eastern Cape Province. The foundation of a demolished structure on the property (bottom left image).**



## DISCUSSION AND CONDITIONS

No archaeological sites/materials were observed during the investigation of the proposed study area. Although it is unlikely that archaeological remains will be found *in situ*, there is always a possibility that human remains and/or other archaeological and historical material may be uncovered during the development. The remains of a demolished structure on the property does not appear to be older than 60 years and it therefore does not fall under the general protection in terms of Section 34 of the National Heritage Resources Act, No. 25 of 1999.

The main impact on possible archaeological sites/remains will be the physical disturbance of the material and its context. Should such material be exposed then work must cease in the immediate area and it must be reported to the archaeologist at the Albany Museum in Makhanda (Grahamstown) (Tel: 046 622 2312) or to the Eastern Cape Provincial Heritage Resources Authority (Tel.: 043 745 0888), 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). The applicant must finance the costs should additional investigations be required.

## LETTER OF RECOMMENDATION

It is recommended that the proposed development of a Solar Photovoltaic (PV) facility on Erf 77 in Greenbushes, Gqeberha (Port Elizabeth), Nelson Mandela Bay Municipality, Eastern Cape Province, be exempted from a full Phase 1 Archaeological Heritage Impact Assessment. The proposed development area appears to be of **low archaeological sensitivity**, and it is therefore unlikely that any significant archaeological remains will be found on the property. The proposed development may therefore proceed as planned.

Note: 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 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.

Section 38 of the National Heritage Resources Act, No. 25 of 1999 (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 emphasized that this letter of recommendation for the 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 the development), it must be reported to the archaeologist at the Albany Museum in Makhanda (Grahamstown) (Tel: 046 622 2312) or to the Eastern Cape Provincial Heritage Resources Authority (Tel.: 043 745 0888) immediately.

The developer must finance the costs should additional studies be required as outlined above. The consultant is responsible to forward this report to the relevant Heritage Authority for

assessment, unless alternative arrangements have been made with the specialist to submit the report.

## **APPENDIX A: brief legislative requirements**

Parts of sections 34, 35(4), 36(3) and 38(1) of the National Heritage Resources Act, No. 25 of 1999 apply:

### ***Structures***

*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***

*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 INLAND AREAS: guidelines and procedures for developers**

### **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 and developers are requested to be on the alert for this.

### **Fossil bone**

Fossil bones or any other 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 distributed naturally should be reported. If the stone tools are associated with bone remains, development should be halted immediately and archaeologists notified.

### **Stone features and platforms**

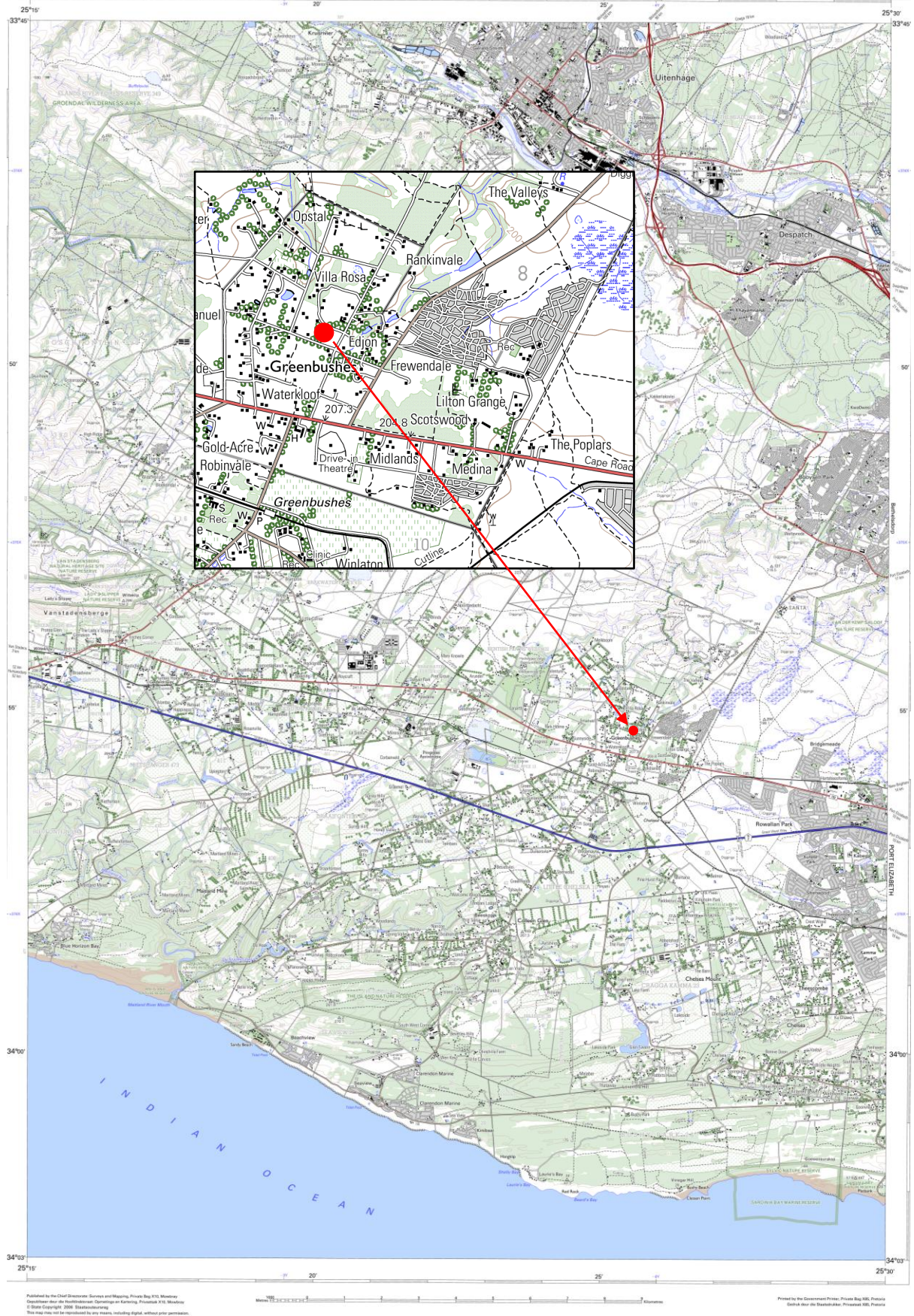
These occur in different forms and sizes, but easily identifiable. The most common are an accumulation of roughly circular fire cracked stones tightly spaced and filled in with charcoal and marine shell. They are usually 1-2 metres in diameter and may represent cooking platforms for shell fish. Others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

### **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.

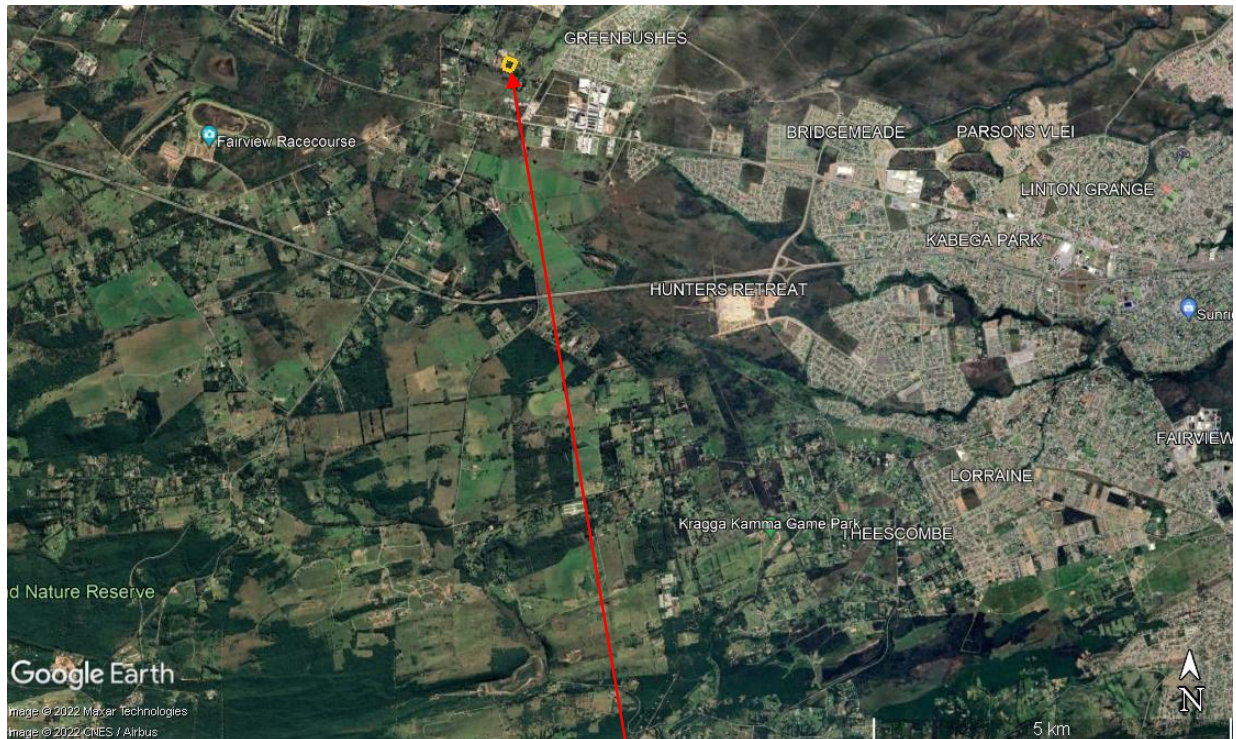


3325CD &amp; 3425AB UITENHAGE

1:50 000 SOUTH AFRICA  
SUID-AFRIKA

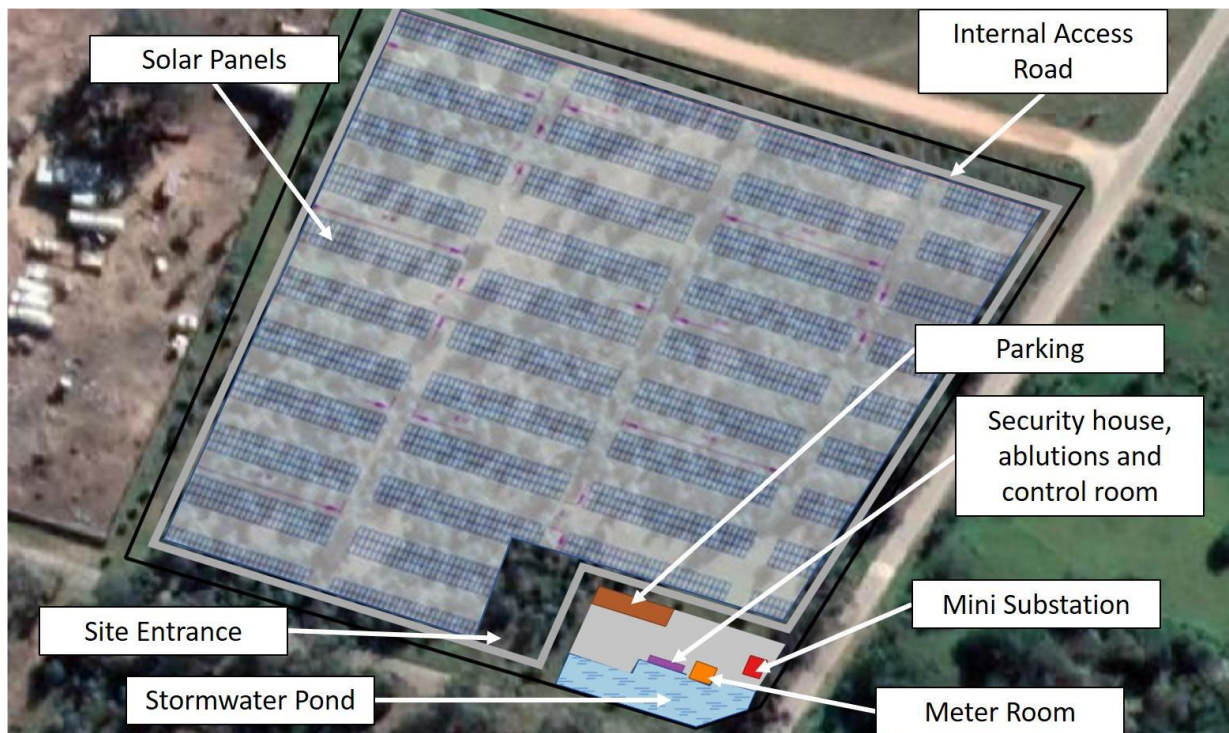
**Map 1. 1:50 000 Topographic maps indicating the approximate location of the proposed development area on Erf 77 in Greenbushes, Gqeberha (Port Elizabeth), Nelson Mandela Bay Municipality, Eastern Cape Province (indicated with the red arr**





**Map 2. Aerial views of the location of the proposed development area on Erf 77 in Greenbushes, Gqeberha (Port Elizabeth), Nelson Mandela Bay Municipality, Eastern Cape Province (indicated with the red arrow). The property boundary is outlined in yellow.**





**Map 3. Layout for the proposed development on Erf 77 in Greenbushes, Gqeberha (Port Elizabeth), Nelson Mandela Bay Municipality, Eastern Cape Province. (Map courtesy of Habitat Link Consulting).**