

**A LETTER OF RECOMMENDATION (WITH CONDITIONS) FOR THE EXEMPTION OF
A FULL PHASE 1 ARCHAEOLOGICAL HERITAGE IMPACT ASSESSMENT FOR THE
PROPOSED CONSTRUCTION OF THE ACCIONA NXUBA TEMPORARY CONCRETE
PLANT ON PORTION 0 OF THE FARM VAN WYKS KRAAL NO. 73 NEAR
COOKHOUSE, BLUE CRANE ROUTE LOCAL MUNICIPALITY, SARAH BAARTMAN
DISTRICT MUNICIPALITY, EASTERN CAPE PROVINCE.**

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A LETTER OF RECOMMENDATION (WITH CONDITIONS) FOR THE EXEMPTION OF A FULL PHASE 1 ARCHAEOLOGICAL HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED CONSTRUCTION OF THE ACCIONA NXUBA TEMPORARY CONCRETE PLANT ON PORTION 0 OF THE FARM VAN WYKS KRAAL NO. 73 NEAR COOKHOUSE, BLUE CRANE ROUTE LOCAL MUNICIPALITY, SARAH BAARTMAN DISTRICT MUNICIPALITY, EASTERN CAPE PROVINCE.

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PROJECT INFORMATION

Type of development

The project will include the construction of an on-site temporary concrete plant for the casting of tower mould segments which are required for the production of the Nxuba Wind Farm wind turbine towers. The construction site will cover an area of 100 000 square metres and will include the concrete plant, material storage areas, offices, warehouses and parking areas.

Applicant

Nxuba Wind farm (RF) (Pty) Ltd.

Consultant

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Proposal

The original proposal was to conduct a Phase 1 Archaeological Impact Assessment (AIA) for the proposed construction of the Acciona Nxuba Temporary Concrete Tower Plant on Portion 0 of the farm Van Wyks Kraal No. 73, Sarah Baartman District Municipality, Blue Crane Route Local Municipality of the Eastern Cape Province, 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 site for the proposed construction of the Acciona Nxuba Temporary Concrete Tower Plant on Portion 0 of the farm Van Wyks Kraal No. 73 is located within the 1:50 000 topographic reference map 3225DB Cookhouse (Map 1). It is situated close to the Poseidon Substation approximately 12 kilometres east of Cookhouse and 15 kilometres south-west of Bedford in the Blue Crane Route Local Municipality and Sarah Baartman District Municipality of the Eastern Cape Province. The site is located next to (north) the gravel road connecting Cookhouse and Bedford which also runs pass the Poseidon Substation (Maps 1-2).

The proposed area for the developments near the Poseidon Substation is relatively flat, well-covered with dense short grass and dotted with numerous anthills (Figure 1). The construction of the Poseidon Substation, several power lines, roads and small scale farming activities has disturbed the area severely in the past. The main activity in the area is commercial stock farming and the land is used for grazing of livestock.

ARCHAEOLOGICAL ASSESSMENT AND CONCLUSIONS

The proposed site for the construction of the Acciona Nxuba Temporary Concrete Tower Plant on Portion 0 of the farm Van Wyks Kraal No. 73 has been investigated during 2015 as part of the walkthrough surveys for the final optimised layout of the authorised Nxuba Wind Farm and for the proposed construction of a substation and power line within the authorised Nxuba Wind Farm (Binneman & Reichert 2015a and b). All relevant background information is included in these reports and will not be repeated here in detail.

Prior to the 2015 walkthrough surveys for the area under discussion, the landowner was consulted on possible locations of historical buildings and features, cemeteries, graves and archaeological sites. All relevant survey information for the immediate and adjacent areas was consulted and a Google Earth aerial image investigation was also conducted. The walkthrough surveys were conducted on foot by two archaeologists. GPS readings were taken and all important features were digitally recorded.

At the time of the investigations of the above mentioned area the archaeological visibility was poor due to dense, short grass cover (Figure 1). The grass cover and absence of sheet erosion made it difficult to locate archaeological sites/materials. No significant archaeological sites/materials were observed during the 2015 walkthrough surveys of the substation site, overhead power line route and the turbine positions (Map 2). However, although sites/materials may be covered by soil and vegetation, the proposed construction site appears to be of low cultural sensitivity and it is unlikely that any archaeological remains of significance will be found *in situ* or exposed during the development. There are no known buildings/features or graves older than 60 years in the area.



Figure 1. General views from the gravel road towards the Poseidon Substation of the proposed site for the construction of the Acciona Nxuba Temporary Concrete Tower Plant on Portion 0 of the farm Van Wyks Kraal No. 73.

DISCUSSION AND CONDITIONS

No archaeological sites/materials were observed during the 2015 investigations in the proposed area for development. In general it would appear that the proposed site for the construction of the Acciona Nxuba Temporary Concrete Tower is of low cultural significance. Although it is unlikely that archaeological remains will be exposed, there is always a possibility that human remains and/or other archaeological and historical material may be uncovered during the development. Should such material be exposed then work must cease in the immediate area of the finds and it must be reported to the archaeologist at the Albany Museum (046 6222312) or to the Eastern Cape Provincial Heritage Resources Authority (043 6422811), 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

Regardless of the restrictions imposed by the natural conditions, the experiences and knowledge gained from the 2015 and several other previous investigations in the wider surrounding region, provided background information to make assumption and predictions on the incidences and the significance of possible pre-colonial archaeological sites/material which may be located in the area, or which may be covered by soil and vegetation. The proposed area for development appears to be of low cultural sensitivity and it is unlikely that any significant archaeological heritage remains will be exposed during the development. Therefore it is recommended that the proposed construction of the Acciona Nxuba Temporary Concrete Tower on Portion 0 of the farm Van Wyks Kraal No. 73 in the Blue Crane Route Local Municipality and Sarah Baartman District Municipality of the Eastern Cape Province is exempted from a full Phase 1 Archaeological Heritage Impact Assessment. The proposed development may 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 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 emphasized 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), it must be reported to the archaeologist at the Albany Museum (046 6222312) or to the Eastern Cape Provincial Heritage Resources Authority (043 6422811) immediately. The developer must finance the costs should additional studies be required as outlined above. The *onus* is also on the developer to ensure that this agreement is honoured in accordance with the National Heritage Act No. 25 of 1999. 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.

References

Binneman, J. and Reichert, K. 2015. An archaeological walkthrough survey of the final optimised layout of the authorised Nxuba Wind Farm near Cookhouse, Blue Crane Route Local Municipality, Sarah Baartman District Municipality, Eastern Cape Province. Prepared for Savannah (Pty) Ltd Sunninghill. Eastern Cape Heritage Consultants. Jeffreys Bay.

Binneman, J. and Reichert, K. 2015. An archaeological assessment and walkthrough survey of the proposed construction of a facility substation complex, metering station and 132 kv overhead power line within the authorised development envelope of the Nxuba Wind Farm near Cookhouse, Blue Crane Route Local Municipality, Sarah Baartman District Municipality, Eastern Cape Province. Prepared for Savannah (Pty) Ltd Sunninghill. Eastern Cape Heritage Consultants. Jeffreys Bay.

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 5000m² 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 000m² 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 human remains are buried in a flexed position on their side, but are also found buried in a sitting position with a flat stone capping. Developers are requested to be on alert for the possibility of uncovering such remains.

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 m² in extent, should be reported to an archaeologist.

Large stone cairns

They come in different forms and sizes, but are easy to identify. The most common are roughly circular stone walls (mostly collapsed) and may represent stock enclosures, remains of wind breaks or cooking shelters. Others consist of large piles of stones of different sizes and heights and 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.

Stone artefacts

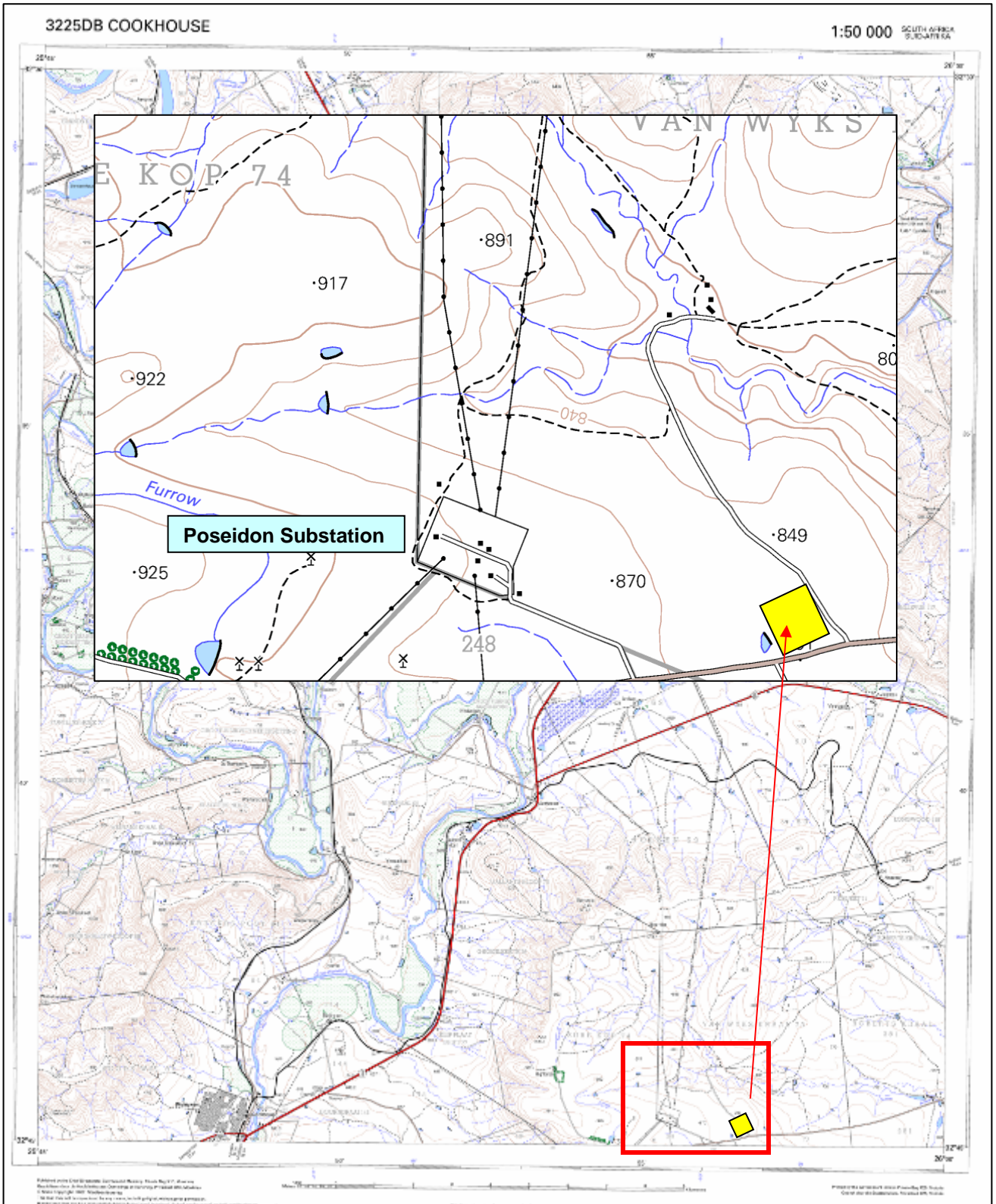
These are difficult for the layman to identify. However, large accumulations of flaked stones which do not appear to have been distributed naturally should be reported. If the stone tools are associated with bone remains, development should be halted immediately and archaeologists notified.

Fossil bone

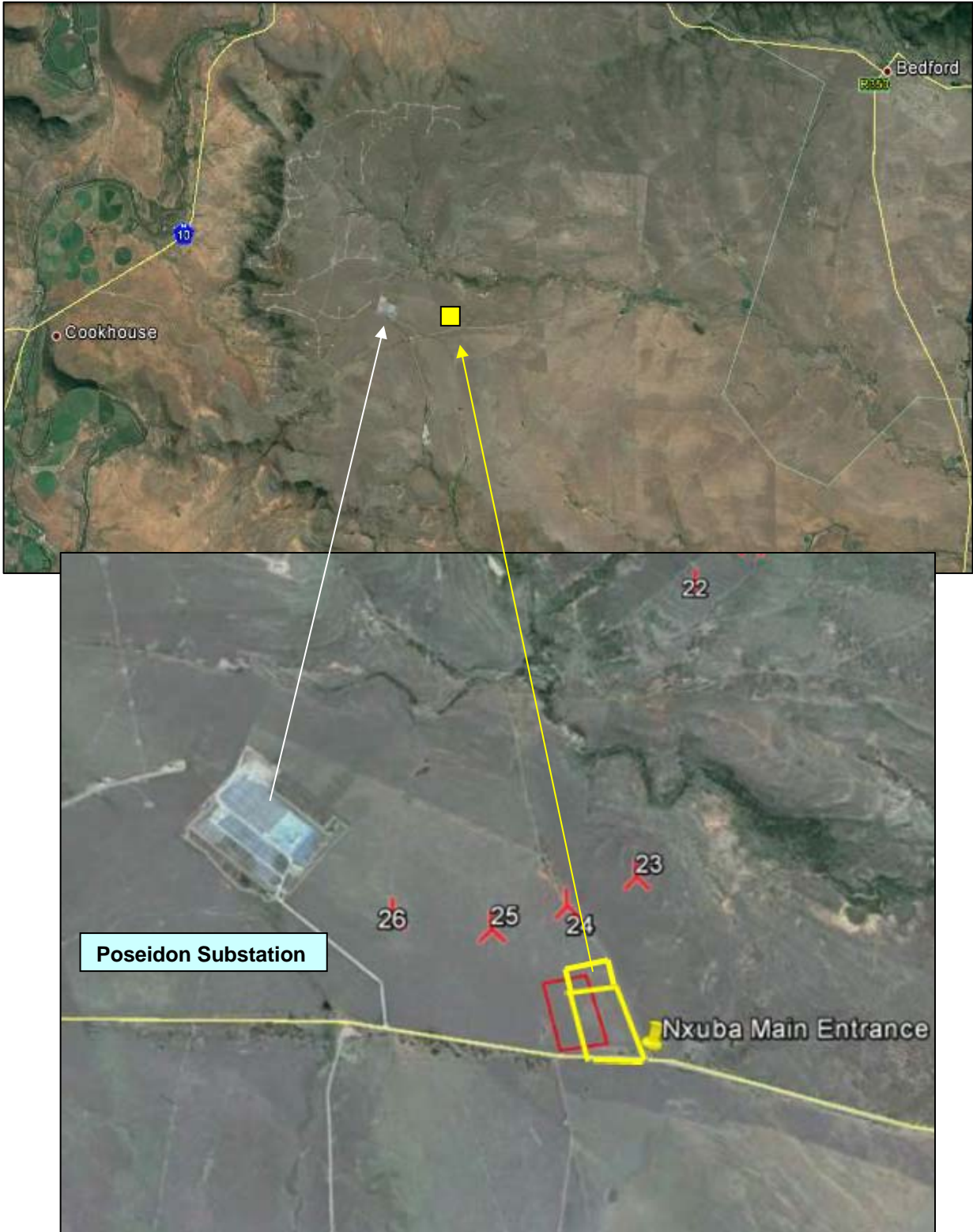
Fossil bones may be found embedded in geological deposits. Any concentrations of bones, whether fossilized or not, should be reported.

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 location of the proposed site for the construction of the Acciona Nxuba Temporary Concrete Tower Plant marked by the yellow square.



Map 2. Aerial images of the location of the proposed site for the construction of the Acciona Nxuba Temporary Concrete Tower Plant (insert image courtesy of Savannah Environmental (Pty) Ltd).