ARCHAEOLOGICAL IMPACT ASSESSMENT

FOR THE PROPOSED GAROB BORROW PIT, NORTHERN CAPE PROVINCE.

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Site Plan Consulting

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General

The possibility of unmarked or informal graves and subsurface finds cannot be excluded. If any possible finds are made during construction, the operations must be stopped and a qualified archaeologist contacted for an assessment of the find/s.

Disclaimer: *Although all possible care is taken to identify sites of cultural importance during the investigation of study areas, it is always possible that hidden or sub-surface sites could be overlooked during the study. Heritage Contracts and Archaeological Consulting CC and its personnel will not be held liable for such oversights or for costs incurred as a result of such oversights.*

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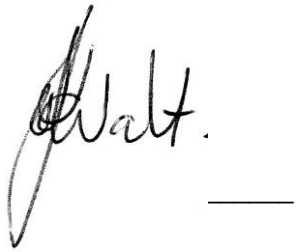
SIGNATURE: 

EXECUTIVE SUMMARY

Site name and location: The proposed Garob Borrow Pit is located on the farm Nelspoortje close to Copperton in the Northern Cape Province.

1: 50 000 Topographic Map: 2922 CD

EIA Consultant: Site Plan Consulting

Developer: Power Construction (Pty) Ltd

Heritage Consultant: Heritage Contracts and Archaeological Consulting CC (HCAC).
Contact person: Jaco van der Walt Tel: +27 82 373 8491 E –mail jaco.heritage@gmail.com.

Date of Report: 22 July 2016.

Findings of the Assessment:

HCAC was appointed to assess the study area in terms of the archaeological component of Section 35 of the NHRA as part of the basic assessment for the project. Some isolated MSA artefacts were noted in the study area. These tools are scattered too sparsely to be of any significance apart from noting their presence which has been done in this report. No further mitigation prior to construction is recommended in terms of Section 35 for the proposed development to proceed.

In terms of the built environment of the area (Section 34), no standing structures occur within the study area.

In terms of Section 36 of the Act no burial sites were recorded in the study area. However if any graves are located in future they should ideally be preserved *in-situ* or alternatively relocated according to existing legislation. Due to the subsurface nature of archaeological remains and the fact that graves can occur anywhere on the landscape, it is recommended that a chance find procedure is implemented for the project as part of the EMP

Due to the lack of significant heritage features in the study area there is from an archaeological point of view no reason why the development cannot commence based on approval from SAHRA.

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ABBREVIATIONS

AIA: Archaeological Impact Assessment
ASAPA: Association of South African Professional Archaeologists
BIA: Basic Impact Assessment
CRM: Cultural Resource Management
ECO: Environmental Control Officer
EIA: Environmental Impact Assessment*
EIA: Early Iron Age*
EIA Practitioner: Environmental Impact Assessment Practitioner
EMP: Environmental Management Plan
ESA: Early Stone Age
GPS: Global Positioning System
HIA: Heritage Impact Assessment
LIA: Late Iron Age
LSA: Late Stone Age
MEC: Member of the Executive Council
MIA: Middle Iron Age
MPRDA: Mineral and Petroleum Resources Development Act
MSA: Middle Stone Age
NEMA: National Environmental Management Act
PRHA: Provincial Heritage Resource Agency
SADC: Southern African Development Community
SAHRA: South African Heritage Resources Agency

**Although EIA refers to both Environmental Impact Assessment and the Early Iron Age both are internationally accepted abbreviations and must be read and interpreted in the context it is used.*

GLOSSARY

Archaeological site (remains of human activity over 100 years old)
Early Stone Age (~ 2.6 million to 250 000 years ago)
Middle Stone Age (~ 250 000 to 40-25 000 years ago)
Later Stone Age (~ 40-25 000, to recently, 100 years ago)
The Iron Age (~ AD 400 to 1840)
Historic (~ AD 1840 to 1950)
Historic building (over 60 years old)

1 BACKGROUND INFORMATION

Heritage Contracts and Archaeological Consulting CC (**HCAC**) was appointed to conduct an Archaeological Impact Assessment for the proposed Garob Borrow Pit project as part of the Basic Assessment process.

The aim of the study is to identify cultural heritage sites, document, and assess their importance within local, provincial and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources, and to submit appropriate recommendations with regard to the responsible cultural resources management measures that might be required to assist the developer in managing the discovered heritage resources in a responsible manner. It is also conducted to protect, preserve, and develop such resources within the framework provided by the National Heritage Resources Act of 1999 (Act 25 of 1999).

The report outlines the approach and methodology utilized before and during the survey, which includes: Phase 1, a desktop study that includes collection from various sources and consultations; Phase 2, the physical surveying of the study area on foot and by vehicle; Phase 3, reporting the outcome of the study.

General site conditions were recorded by means of photographs, GPS locations, and site descriptions. Possible impacts were identified and mitigation measures are proposed in the following report.

This report must also be submitted to the SAHRA for review.

1.1. Terms of Reference

Desktop study
Conduct a brief desktop study where information on the area is collected to provide a background setting of the archaeology that can be expected in the area.

Field study
Conduct a field study to: a) systematically survey the proposed project area to locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest; b) record GPS points identified as significant areas; c) determine the levels of significance of the various types of heritage resources recorded in the project area.

Reporting
Report on the identification of anticipated and cumulative impacts the operational units of the proposed project activity may have on the identified heritage resources for all 3 phases of the project; i.e., construction, operation and decommissioning phases. Consider alternatives, should any significant sites be impacted adversely by the proposed project. Ensure that all studies and results comply with Heritage legislation and the code of ethics and guidelines of ASAPA.

To assist the developer in managing the discovered heritage resources in a responsible manner, and to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act of 1999 (Act 25 of 1999).

1.2. Archaeological Legislation and Best Practice

Phase 1, an AIA or a HIA is a pre-requisite for development in South Africa as prescribed by SAHRA and stipulated by legislation. The overall purpose of a heritage specialist input is to:

- Identify any heritage resources, which may be affected;
- Assess the nature and degree of significance of such resources;
- Establish heritage informants/constraints to guide the development process through establishing thresholds of impact significance;
- Assess the negative and positive impact of the development on these resources;
- Make recommendations for the appropriate heritage management of these impacts.

The AIA or HIA, as a specialist sub-section of the EIA, is required under the National Heritage Resources Act NHRA of 1999 (Act 25 of 1999), Section 23(2) (b) of the NEMA and section S. 39 (3) (b) (iii) of the MPRDA.

The AIA should be submitted, as part of the EIA, BIA or EMP, to the PHRA if established in the province or to SAHRA. SAHRA will be ultimately responsible for the professional evaluation of Phase 1 AIA reports upon which review comments will be issued. 'Best practice' requires Phase 1 AIA reports and additional development information, as per the EIA, BIA/EMP, to be submitted in duplicate to SAHRA after completion of the study. SAHRA accepts Phase 1 AIA reports authored by professional archaeologists, accredited with ASAPA or with a proven ability to do archaeological work.

Minimum accreditation requirements include an Honours degree in archaeology or related discipline and 3 years post-university CRM experience (field supervisor level).

Minimum standards for reports, site documentation and descriptions are set by ASAPA in collaboration with SAHRA. ASAPA is based in South Africa, representing professional archaeology in the SADC region. ASAPA is primarily involved in the overseeing of ethical practice and standards regarding the archaeological profession. Membership is based on proposal and secondment by other professional members.

Phase 1 AIA's are primarily concerned with the location and identification of sites situated within a proposed development area. Identified sites should be assessed according to their significance. Relevant conservation or Phase 2 mitigation recommendations should be made. Recommendations are subject to evaluation by SAHRA.

Conservation or Phase 2 mitigation recommendations, as approved by SAHRA, are to be used as guidelines in the developer's decision making process.

Phase 2 archaeological projects are primarily based on salvage/mitigation excavations preceding development destruction or impact on a site. Phase 2 excavations can only be conducted with a permit, issued by SAHRA to the appointed archaeologist. Permit conditions are prescribed by SAHRA and includes (as minimum requirements) reporting back strategies to SAHRA and deposition of excavated material at an accredited repository.

In the event of a site conservation option being preferred by the developer, a site management plan, prepared by a professional archaeologist and approved by SAHRA, will suffice as minimum requirement.

After mitigation of a site, a destruction permit must be applied for from SAHRA by the client before development may proceed.

Human remains older than 60 years are protected by the National Heritage Resources Act, with reference to Section 36. Graves older than 60 years, but younger than 100 years fall under Section 36 of Act 25 of 1999 (National Heritage Resources Act), as well as the Human Tissues Act (Act 65 of 1983), and are the jurisdiction of SAHRA. The procedure for Consultation Regarding Burial Grounds and Graves (Section 36[5]) of Act 25 of 1999) is applicable to graves older than 60 years that are situated outside a formal cemetery administrated by a local authority. Graves in this age category, located inside a formal cemetery administrated by a local authority, require the same authorisation as set out for graves younger than 60 years, in addition to SAHRA authorisation. If the grave is not situated inside a formal cemetery, but is to be relocated to one, permission from the local authority is required and all regulations, laws and by-laws, set by the cemetery authority, must be adhered to.

Human remains that are less than 60 years old are protected under Section 2(1) of the Removal of Graves and Dead Bodies Ordinance (Ordinance no. 7 of 1925), as well as the Human Tissues Act (Act 65 of 1983), and are the jurisdiction of the National Department of Health and the relevant Provincial Department of Health and must be submitted for final approval to the office of the relevant Provincial Premier. This function is usually delegated to the Provincial MEC for Local Government and Planning; or in some cases, the MEC for Housing and Welfare. Authorisation for exhumation and reinternment must also be obtained from the relevant local or regional council where the grave is situated, as well as the relevant local or regional council to where the grave is being relocated. All local and regional provisions, laws and by-laws must also be adhered to. To handle and transport human remains, the institution conducting the relocation should be authorised under Section 24 of Act 65 of 1983 (Human Tissues Act).

1.3. Description of Study Area

1.3.1 Location Data

The proposed development will be located on the remainder of portion 5 of the farm Nelspoortje 103 approximately 7 km to the east of Copperton and to the west of Prieska in the Northern Cape Province at 29° 55' 38.6140" S, 22° 22' 59.6618" E (Figure 1).

The vegetation is predominantly Bushmanland Arid Grassland vegetation in the Nama-Karoo biome (Mucina & Rutherford 2006) which consists of Karoo scrub and grass and a few isolated *Acacia Karoo* trees. Historical imagery on Google earth indicates that the land has been fallow for a number of years and mostly used for grazing.

1.3.2. Location Map

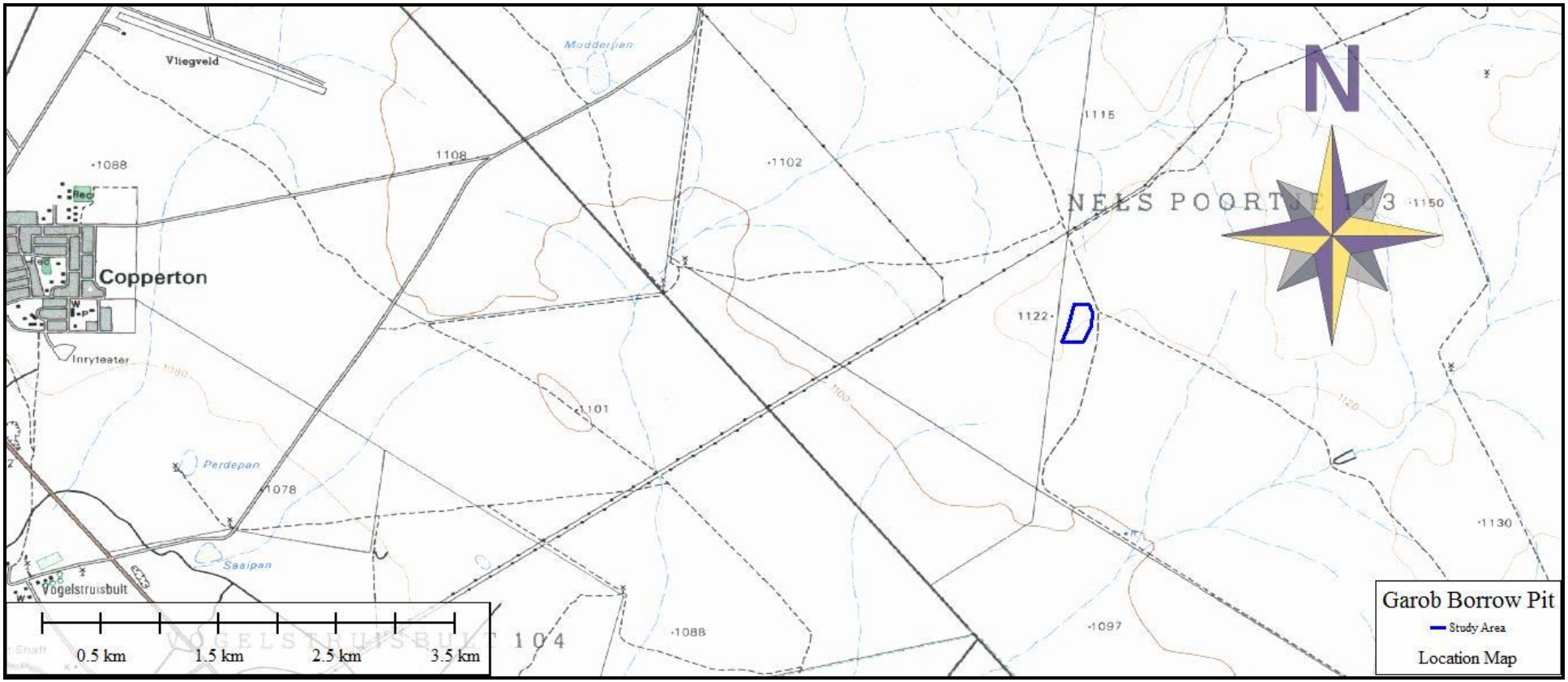

Figure 1. Location map.

2. APPROACH AND METHODOLOGY

The aim of the study is to cover archaeological databases to compile a background of the archaeology that can be expected in the study area followed by field verification; this was accomplished by means of the following phases.

2.1 Phase 1 - Desktop Study

The first phase comprised desktop, scanning existing records for archaeological sites, historical sites, graves, architecture (structures older than 60 years) of the area. The following approached was followed:

2.1.1 Literature Search

This was conducted by utilising data stored in the national archives and published reports relevant to the area. The aim of this is to extract data and information on the area in question.

2.1.2 Information Collection

SAHRIS was consulted to collect data from previously conducted CRM projects in the region to provide a comprehensive account of the history of the study area.

2.1.3 Consultation

No public consultation was done by the author as this was done independently as part of the BA.

2.1.4 Google Earth and Mapping Survey

Google Earth and 1:50 000 maps of the area were utilised to identify possible places where sites of heritage significance might be located.

2.1.5 Genealogical Society of South Africa

The database of the Genealogical Society was consulted to collect data on any known graves in the area.

2.2 Phase 2 - Physical Surveying

Due to the nature of cultural remains, the majority of which occurs below surface, a field survey of the proposed development was conducted. The study area was surveyed by means of vehicle and extensive pedestrian surveys during the week of 15 July 2016.

The survey was aimed at covering the proposed development footprint, focussing on specific areas on the landscape that would be more likely to contain archaeological and/or other heritage remains like drainage lines, rocky outcrops as well as slight elevations in the natural topography. These areas were searched more intensively, but many other areas were walked in order to confirm expectations in those areas. Track logs of the areas covered were taken (Figure 2).

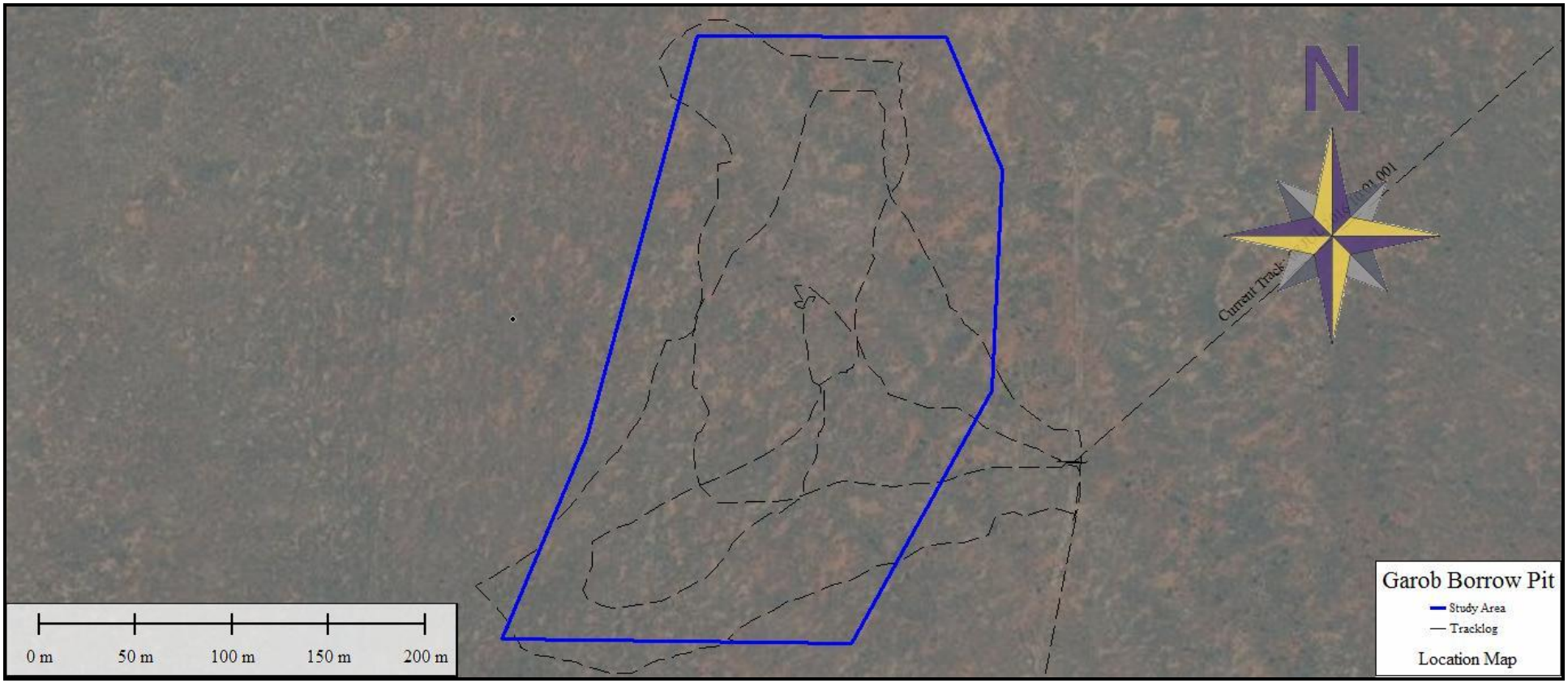

Figure 2. Track logs of the areas surveyed indicated in black with the development footprint indicated in blue.

2.3. Restrictions

Due to the subsurface nature of archaeological artefacts, the possibility exists that some features or artefacts may not have been discovered/ recorded during the survey and the possible occurrence of unmarked graves and other cultural material cannot be excluded. This report only deals with the footprint area of the proposed development as indicated in the location map.

Although HCAC surveyed the area as thoroughly as possible, it is incumbent upon the developer to stop operations and inform the relevant heritage agency should further cultural remains, such as graves, stone tool scatters, artefacts, bones or fossils, be exposed during the process of development.

3. NATURE OF THE DEVELOPMENT

The proposed development comprises a borrow pit for construction aggregate mining.

All aspects of the site planning and location are largely informed by the geology of the site which can yield suitable quality and volume of Calcrete for the Garob windfarm construction requirements of its roads and turbine platforms. The western Boundary of the site is fixed by the outcrop of basement rocks while the extent of the site is determined by the 5 ha maximum allowable mining permit area combined with the established 2 meter depth availability giving a reserve definition of 100 000 tight m^3 gross.

Standard mining practice of such small scale mining operations as established in the industry is followed, with the use of the following machinery:

- Recover and loading of soft Calcrete with excavator
- Percussion drill-rig use in drilling of blast holes in hardpan Calcrete when encountered
- Best available blast design will be applied at the site to minimize fly rock and dust generation by blasting.
- Excavator loading of crushed Calcrete to delivery trucks
- Potential for a Tracked Mobile Crusher on site, for conducting of primary processing by means of screening and crushing to required materials specifications.
- Delivery by means of Trucks to construction sites

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4. HISTORICAL AND ARCHAEOLOGICAL BACKGROUND OF THE STUDY AREA

4.1 Databases Consulted

A previous heritage study was conducted to the west of the study area (SAHRIS) by Van Ryneveld (2006). More recently J Orton (2012) conducted a study to the south west of the study area on the farm Hoekplaas and Kaplan and Wiltshire (2011) on portion 3 and 4 of the farm Nelspoortjie (now called Vogelstruisfontein). All the studies recorded ESA, MSA and LSA artefacts scattered over the landscape with MSA and LSA sites centred on pans. Orton also recorded stone walled enclosures.

Genealogical Society and Google Earth Monuments

No cemeteries are indicated for the farm under investigation.

4.2. Brief background to the study area

A farm does not exist in isolation and the history of the surrounding area will be briefly discussed. Sources for the history of the area surrounding the study area include secondary source material, maps, electronic sources, and archival documents. A brief history of human settlement from the source of J. S. Bergh (1999) will be used to write a short history of the area.

4.2.1. Historical background of the area

In order to understand the historical context of a certain area, it is necessary to consider the geographic and climatic nature of the region in question. The town of Copperton is located in a region in South Africa known as the Upper Karoo. One gets a good idea of what the natural landscape in the Upper Karoo was like between the late 1700s and early 1800s when one reads the transcripts of some of the early European travellers who passed through the area. One C. J. Skead compiled a book in which many of these texts are assembled. In November 1900, the traveller W. Somerville wrote about the Groot Riviers Poort, or Prieskapoort, 10km south of Prieska and therefore not very far from Copperton. He noted that grasslands and thorn trees covered the landscape, but that no tree was to be seen. When he neared the Orange River, he noted that the banks were covered with wood, but only along the margin of the river. These were mainly willow and karee trees. Along the tributary streams were thorn trees (Skead 2009: 87).

Exactly one year later, One P. B. Borcherds wrote about the Grootrivierpoort at Prieska, making similar remarks about the flora as Somerville did. He also noted that the *poort* at the entrance to the Orange River was known by the “natives” under the name of t’Gariep. When this traveller passed along the banks of the Orange River near Prieska in the same year, he made notes on the Bushmen, who were still present in the area at that time. Regarding the manufacturing of bows and arrows by the Bushmen, he noted that the wood of the bow was of a type of tree commonly known as *caree boomen,* which was very tough and pliable. The arrows were made of a type of reed fairly common along all springs and river flowing there, known as *fluitjies riet*.

The Bushmen apparently used the poison of venomous plants and poison extracted from the fangs of snakes to smear on their arrow points. These people also found sustenance in a type of small bulb, commonly called *mans uitjies* by the Khoikhoi, which were described to be the size of small marbles and not unpleasant in taste (Skead 2009: 87-88).

In September 1822, W. J. Burchell passed through Prieska, as well as the area to the south and southwest thereof. Some 50km southwest of Prieska, he found a large muddy dam, which was situated in a very extensive hollow flat. This would become a lake in the rainy season. There was apparently still some clean water to be found. The area around this was hard and dry, and plentifully strewed with stones and low shrubs. Burchell passed through Prieska to the Orange River in the same month. He noted that none of the bushes exceeded a foot in height. Nearer to the Orange River, the travelling party found a group of Khoikhoi camped in a grove.

By 1903, Copperton was located in an area in which the annual rainfall measured between 10 and 20 inches, and was therefore quite arid. The farm area is located in a summer rainfall region. By the early 1900s, the Prieska district, in which Copperton would be located, could not be considered a very agriculturally active area. Only between 25 and 50 sheep were kept per square mile, and only between 2 and 5 heads of cattle. The area where Copperton was later founded would have been too dry and too far from the Orange River to allow for the growing of crops (Burton 1903: 40; 256).

The farm Nelspoortje No. 103 is located in close proximity of the small town of Copperton, and the history of this town is therefore of importance. On 16 November 1991, an article was published in *Die Burger* with regards to the town Copperton. It was asserted that the old deserted Northern Cape mining town would be developed and populated as a "Volkstaatsdorp" (city state / Volkstaat town) by the Oranje Development Corps. It was said that Copperton would then be the second Volkstaat town in South Africa that had been developed exclusively to be inhabited by whites. Earlier that year, Orania had been developed as such a town. Though the town of Copperton had been abandoned at the time, a business centre, primary school, nursery school, an office development and a drive-in theatre had been developed. About 50% of the town's streets were tarred (Anon 1991: 2).

In November 1991, the Weekend Argus also published an article regarding the development of Copperton as an Orania-like town. It was noted that the 300 hectares mine area near the town would be used for industrial development, and that agriculture, as well as light industry such as steel, rubber and textile industries, were expected to be developed in the town. It could not be ascertained whether this town was eventually developed in this way (Anon 1991: 5).

In an article in the Patriot, dated December 1995, some background information is given on the history of the town of Copperton. This town is not very old, as it was only developed in 1972 with the establishment of a copper mine in the area. The mine closed in 1992, and Copperton was sold to a private person, on the condition that the houses in the town would be demolished. About 300 houses were broken down, when it was decided that some homes would be kept in order to develop a retirement town. These houses were apparently solidly built, with stone walls and corrugated roofs. It was noted that the area was very sparsely populated, and that the farmers in the area farmed with sheep. Next to the Orange River, maize and grapes were planted. It was noted that the closest hospitals were located at Prieska, some 35 to 40 minutes' drive from Copperton, and linked with a tarred road (Anon 1995: 4).

4.2. 2. Historical Overview of the study area.

Unfortunately, no documents referring to this farm could be found at the National Archives of South Africa. It is however possible to draw some conclusions with bits and pieces of information that could be found elsewhere.

It seems that the Messrs. Loots applied to buy the farm Nelspoortje, at that time known as Lot 4826 and located in the Prieska district, between 1889 and 1890 (Cape Town Archives Repository *KAB, LND: 1/327 L3329).*

Unfortunately, for the purpose of this report it was not possible to find records with regards to the ownership of Nelspoortje from the late 1800s onwards. It is likely that such records will be available in the Cape. It was however found that one Gideon Bertus Jacobs became the owner of Portion 6 of the farm in 1981 (Deeds Office Property 2012).

Beaumont *et al.* (1995: 240) observed that "thousands of square kilometres of Bushmanland are covered by a low density lithic scatter". These artefacts are generally very well weathered and mostly pertain to the ESA and MSA. Occasional LSA artefacts are also noted. What is noteworthy of the Northern Cape archaeological record is the presence of pans which frequently display associated archaeological material. Of interest here is the work of Kiberd (2001, 2005, 2006) who excavated Bundu Pan, some 25 to 30 km northwest of Copperton. The site yielded ESA, MSA and LSA horizons and the artefacts were accompanied by warthog and equid teeth to name a few (Beaumont *et al.* 1995).

Orton (2011) noted that to the northwest, west and southwest of Copperton sites have been investigated by Beaumont and colleagues (1995), Smith (1995a) and Parsons (2003, 2004, 2007, 2008) yielding LSA deposits. Work on these sites led to a distinction between hunter-gatherer and herder sites, based on stone artefact assemblages (Beaumont *et al.* 1995). All these Later Stone Age sites have very few, if any, organic items on them. The only organic material found on sites like these is fragments of ostrich eggshell probably belonging to broken water containers. Such flasks have been widely recorded across the Northern Cape (Morris 1994).

5. HERITAGE SITE SIGNIFICANCE AND MITIGATION MEASURES

The presence and distribution of heritage resources define a 'heritage landscape'. In this landscape, every site is relevant. In addition, because heritage resources are non-renewable, heritage surveys need to investigate an entire project area, or a representative sample, depending on the nature of the project. In the case of the proposed project the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development were surveyed. In all initial investigations, however, the specialists are responsible only for the identification of resources visible on the surface.

This section describes the evaluation criteria used for determining the significance of archaeological and heritage sites. The following criteria were used to establish site significance:

- The unique nature of a site;
- The integrity of the archaeological/cultural heritage deposits;
- The wider historic, archaeological and geographic context of the site;
- The location of the site in relation to other similar sites or features;
- The depth of the archaeological deposit (when it can be determined/is known);
- The preservation condition of the sites;
- Potential to answer present research questions.

Furthermore, The National Heritage Resources Act (Act No 25 of 1999, Sec 3) distinguishes nine criteria for places and objects to qualify as 'part of the national estate' if they have cultural significance or other special value. These criteria are:

- Its importance in/to the community, or pattern of South Africa's history;
- Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;

- Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa;
- Sites of significance relating to the history of slavery in South Africa.

5.1. Field Rating of Sites

Site significance classification standards prescribed by SAHRA (2006), and acknowledged by ASAPA for the SADC region, were used for the purpose of this report. The recommendations for each site should be read in conjunction with section 7 of this report.

FIELD RATING	***GRADE***	***SIGNIFICANCE***	***RECOMMENDED MITIGATION***
National Significance (NS)	Grade 1	-	Conservation; national site nomination
Provincial Significance (PS)	Grade 2	-	Conservation; provincial site nomination
Local Significance (LS)	Grade 3A	High significance	Conservation; mitigation not advised
Local Significance (LS)	Grade 3B	High significance	Mitigation (part of site should be retained)
Generally Protected A (GP.A)	-	High/medium significance	Mitigation before destruction
Generally Protected B (GP.B)	-	Medium significance	Recording before destruction
Generally Protected C (GP.C)	-	Low significance	Destruction

6. BASELINE STUDY-DESCRIPTION OF SITES

It is important to note that the entire farm was not surveyed but only the footprint for the proposed borrow pit that measures approximately 5ha. The topography of the study area is flat with limited vegetation cover and archaeological visibility is high (Figure 3 - 5).

Several studies (van der Walt 2012b, 2014 & 2015) have been conducted on the farm Nelspoortjie and the range of archaeological resources and the Stone Age sequence of the area is well established. Sites recorded on the farm Nelspoortjie consist of Stone Age sites (including ephemeral LSA camps), stone cairns of unknown purpose, circular stone enclosures and historical sites consisting of porcelain, glass and metal artefacts. From previous work on the farm (van der Walt 2012b) Stone Age material is known to occur scattered in varying densities throughout the larger study area.

The area earmarked for the proposed borrow pit is characterised by gravel and hard packed (deflated) Aeolian sand on top of a calcrete layer. In this area isolated and widely scattered MSA tools are found on the locally available quartzite (Figure 6). MSA artefacts consisted of large flakes, radial cores and Levalois type points. No MSA quarries were noted in the study area earmarked for the proposed quarry although several localised MSA quarries exploiting quartz outcrops, quartzite ridges, bedrock and boulders are recorded in the wider area (e.g., Wiltshire 2011; van der Walt 2012).

The recorded tools are scattered too sparsely to be of any significance apart from noting their presence which has been done in this report.

Figure 3: General site conditions viewed from the east.

Figure 4. General site conditions viewed from the west.

Figure 5. General site conditions viewed from the south.

Figure 6. Dorsal view of artefacts.

Figure 7. Google Image of the study area showing no features or structure in the study area.

7. CONCLUSIONS AND RECOMMENDATIONS

HCAC was appointed to assess the study area in terms of the archaeological component of Section 35 of the NHRA. A few individual tools were found scattered in the study area. These isolated tools does not constitute an archaeological site but is classified as background scatter. These isolated tools are scattered too sparsely to be of any significance apart from noting their presence which has been done in this report. No further mitigation is recommended in terms of Section 35 for the proposed development to proceed. In terms of the built environment of the area (Section 34), no standing structures older than 60 years occur within the study area.

In terms of Section 36 of the Act no burial sites were recorded. However if any graves are located in future they should ideally be preserved *in-situ* or alternatively relocated according to existing legislation. Due to the subsurface nature of archaeological remains and the fact that graves can occur anywhere on the landscape, it is recommended that a chance find procedure is implemented for the project as part of the EMP:

Chance find procedure

This procedure applies to the developer's permanent employees, its subsidiaries, contractors and subcontractors, and service providers. The aim of this procedure is to establish monitoring and reporting procedures to ensure compliance with this policy and its associated procedures. Construction crews must be properly inducted to ensure they are fully aware of the procedures regarding chance finds as discussed below.

- If during the pre-construction phase, construction, operations or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, finds any artefact of cultural significance or heritage site, this person must cease work at the site of the find and report this find to their immediate supervisor, and through their supervisor to the senior on-site manager.

- It is the responsibility of the senior on-site Manager to make an initial assessment of the extent of the find, and confirm the extent of the work stoppage in that area.

- The senior on-site Manager will inform the ECO of the chance find and its immediate impact on operations. The ECO will then contact a professional archaeologist for an assessment of the finds who will notify the SAHRA.

The study area is surrounded by residential developments and no significant cultural landscapes or viewscapes were noted during the fieldwork.

7.1 Reasoned Opinion

From a heritage perspective the proposed project is acceptable from a heritage point of view. If the above recommendations are adhered to and based on approval from SAHRA, HCAC is of the opinion that the development can continue as the development will not impact negatively on the archaeological record of the area. If during the pre-construction phase or during construction, any archaeological finds are made (e.g. graves, stone tools, and skeletal material), the operations must be stopped, and the archaeologist must be contacted for an assessment of the finds. Due to the subsurface nature of archaeological material and graves the possibility of the occurrence of unmarked or informal graves and subsurface finds cannot be excluded, but can be easily mitigated by preserving the sites *in-situ* within the development.

8. PROJECT TEAM

Jaco van der Walt, Project Manager

9. STATEMENT OF COMPETENCY

I (Jaco van der Walt) am a member of ASAPA (no 159), and accredited in the following fields of the CRM Section of the association: Iron Age Archaeology, Colonial Period Archaeology, Stone Age Archaeology and Grave Relocation. This accreditation is also acknowledged by SAHRA and AMAFA.

I have been involved in research and contract work in South Africa, Botswana, Zimbabwe, Mozambique, Tanzania and the DRC; having conducted more than 300 AIA's since 2000.

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MAPS

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