

A LETTER OF RECOMMENDATION (WITH CONDITIONS) FOR THE EXEMPTION OF A FULL PHASE 1 ARCHAEOLOGICAL IMPACT ASSESSMENT FOR THE PROPOSED UPGRADING OF THE JEFFREYS BAY SEWER RISING MAIN ON ERF 1344 AND ERF 913, JEFFREYS BAY, PORTIONS 125, 1, 2 AND 78 OF THE FARM ESTATE KLEIN ZEEKOEI RIVIER NO. 335, KOUGA LOCAL MUNICIPALITY, EASTERN CAPE PROVINCE.



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PROJECT INFORMATION

Eastern Cape Heritage Consultants cc has been appointed by CEN Integrated Environmental Management Unit to conduct a Phase 1 Archaeological Impact Assessment (AIA) for the proposed upgrading of the Jeffreys Bay Sewer Rising Main on Erf 1344 and Erf 913, Jeffreys Bay, Portions 125, 1, 2 and 78 of the Farm Estate Klein Zeekoei Rivier No. 335, Kouga Local Municipality, Eastern Cape Province.

The proposed upgrading of the Jeffreys Bay Sewer Rising Main will be located from Dolphin Drive in Jeffreys Bay in a westerly direction along Koraal Street to Pumpstation 4A, thereafter along a gravel road in a westerly direction and will turn in a northerly direction along the Jeffreys Bay Waste Water Treatment Works (WWTW) gravel road, ending at the WWTW.

The pipeline will be located within road reserves and is approximately 4km in length.

Applicant

Kouga Local Municipality

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 3424BB Humansdorp (Map 1). The start of the proposed upgrading of the Jeffreys Bay Sewer Rising Main is located between Ocean View Township and the C-Place residential area, less than a kilometer from the Jeffreys Bay CBD. The pipeline route initially runs along the road reserve of a tar road before it follows the road reserve of a gravel road until it reaches the WWTW outside of Jeffreys Bay. The entire pipeline route has been disturbed in the past as a result of road construction, the construction of the original pipeline and agricultural activities in certain areas. The pipeline route is mostly covered by short grass but denser vegetation can be observed along the gravel road towards the WWTW.

General GPS readings were taken at: 34°3'15.86"S, 24°54'54.13"E (Dolphin Drive), 34°3'9.05"S, 24°53'18.93"E (turning point) and 34°2'21.40"S, 24°53'20.91"E (WWTW).

The following properties will be affected by the proposed upgrading of the pipeline:

Erf 1344, Jeffreys Bay	Portion 1 of the Farm Estate Klein Zeekoei Rivier No. 335
Erf 913, Jeffreys Bay	Portion 2 of the Farm Estate Klein Zeekoei Rivier No. 335
Portion 125 of the Farm Estate Klein Zeekoei Rivier No. 335	Portion 78 of the Farm Estate Klein Zeekoei Rivier No. 335

Relevant Archaeological Impact Assessments

- Binneman, J. 2018. A Phase 1 Archaeological re-assessment of the proposed establishment of an eco-residential development on the Remainder of the Farm Swanlake No. 755, Aston Bay in the Kouga Local Municipality of the Eastern Cape. Prepared for Cape EAPrac (Pty) Ltd. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J. 2008a. A phase 1 archaeological heritage impact assessment of the proposed establishment of eco-residential units on Portion 2 of the farm Swan Lake No. 755, Aston Bay, Kouga Municipality, Eastern Cape Province. Prepared for Coastal & Environmental Services. Grahamstown. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J. 2008b. A phase 1 archaeological heritage impact assessment of the proposed rezoning, subdivision and development of the Remainder of the farm Zeekoei River No. 693 near Paradysstrand (Kouga Municipality), from agriculture to residential zone i & ii, resort zone ii, business zone i and authority zone and to create a residential area, golf estate, business centre and air park. Prepared for Gertenbach Ecological Consultations. Jeffreys Bay. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J. 2008c. Letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological heritage impact assessment for the proposed Boplaas development on Portion 67 (a portion of Portion 57) of the Farm Klein Zeekoei River No. 335, Jeffreys Bay, Kouga Municipality, District of Humansdorp, Eastern Cape. Prepared for Pieter Badenhorst Professional Services. Wellington. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J. 2008d. A phase 1 archaeological heritage impact assessment for the proposed Kouga Wind Energy project near Jeffreys Bay, Kouga Municipality, District of Humansdorp, Eastern Cape. Prepared for the CSIR. Stellenbosch. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J. 2007. Letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological heritage impact assessment for the proposed new pump station and rising main in Ocean View, Jeffreys Bay, Kouga Municipality, Eastern Cape. Prepared for Geological & Environmental Services (GES). Greenacres. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J. 2006a. A phase 1 archaeological heritage impact assessment for the proposed rezoning and subdivision of Portion 1 (the Fountains) of the Farm Klein Zeekoei River No. 335 in Jeffreys Bay, Kouga Municipality, District of Humansdorp, Eastern Cape. Prepared for CEN Integrated Environmental Management Unit. Walmer. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J. 2006b. Letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological heritage impact assessment for the subdivision and rezoning of 40 ha of Portion 123 (portion of Portion 67) of the Farm Estate Klein Zeekoei Rivier No. 335, Humansdorp District (Kouga Municipality), from Agricultural use to Industrial Zone 1. Prepared for Gertenbach Ecological Consultations. Jeffreys Bay.

- Binneman, J and Reichert, K. 2021. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological impact assessment for the proposed extension of Duine Weg Road between Pellsrus and Marina Martinique in Jeffreys Bay, Kouga Local Municipality, Eastern Cape Province. Prepared for: J.G Afrika (Pty) Ltd. Greenacres. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J and Reichert, K. 2018. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological impact assessment for the proposed construction of a single residential dwelling on Erf 833, Paradise Beach, Kouga Local Municipality, Eastern Cape Province. Prepared for MIM Environmental Consulting. Jeffreys Bay. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J and Reichert, K. 2017. A walkthrough of *Site Exigo-KOD-SA01* in the proposed Oceanview township development project at Jeffreys Bay in the Kouga Local Municipality of the Eastern Cape Province. Prepared for AGES Omega Ltd. East Londen. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J and Reichert, K. 2016a. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological impact assessment for the proposed construction of a residential dwelling on Erf 649, Paradise Beach, Kouga Local Municipality, Eastern Cape Province. Prepared for MIM Environmental Consulting. Jeffreys Bay. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J and Reichert, K. 2016b. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological impact assessment for the proposed mining of calcrete on the Remaining Extent of the farm Zeekoe Rivier No. 693, Division of Humansdorp, Kouga Local Municipality Eastern Cape Province. Prepared for Stellenryck Environmental Solutions. Lorraine. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Kaplan, J. 2016. Proposed 66 KV overhead line servitudes and substations Jeffreys Bay, Eastern Cape. Prepared for Pieter Badenhorst Professional Services. Wellington. ACRM. Rondebosch.
- Kruger, N. 2017. Archaeological impact assessment (AIA) of a Portion of Erf 9932 Oceanview for the proposed Oceanview extension residential and mixed use development project, Jeffreys Bay, Kouga Local Municipality, Eastern Cape Province. Prepared for AGES Omega Ltd. East Londen. Exigo Sustainability. Arcadia.
- Webley, L.E. 2006. Heritage assessment of Jubilee Estate, the Farm Seekoeirivier No.355. Prepared for Ecological Management Services, Kimberley. Albany Museum. Grahamstown

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 and by vehicle by an archaeologist. GPS readings were taken with a Garmin and all important features were digitally recorded. The archaeological visibility was relatively good along the majority of the proposed pipeline route and no archaeological sites/materials were observed within the proposed development area. Molehills that occur on the Erf 1344 and Erf 913 were also checked for the presence of possible subsurface archaeological material. The proposed pipeline route falls within the road reserve of Koraal Road and the road reserve of the WWTW gravel road, in an area that has been disturbed in the past by other activities. 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 are no known graves or buildings / structures older than 60 years along the proposed pipeline route. The Jeffreys Bay municipal cemetery is located close to Koraal Road but will not be affected by the proposed development.



Figure 1. General views of the proposed pipeline route for the upgrading of the Jeffreys Bay Sewer Rising Main. The WWTW outside Jeffreys Bay (top image) and Pumpstation 4A near Koraal Road (middle 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. Several archaeological assessments have been conducted in the general area of the proposed development. In the assessments conducted in close proximity to Dolphin Road (starting point) and the WWTW only isolated Early Stone Age (ESA) and Middle Stone Age (MSA) were identified. These finds were not *in situ* and it were not associated with any other cultural material (Binneman 2006a; 2006b; 2007; 2008c, 2008d, Kruger 2017, Webley 2006) The majority of the development area does however fall within the 5 kilometer radius from the coast that is regarded as an archaeological sensitive zone.

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.: 043 492 1941), 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 upgrading of the Jeffreys Bay Sewer Rising Main on Erf 1344 and Erf 913, Jeffreys Bay, Portions 125, 1, 2 and 78 of the Farm Estate Klein Zeekoei Rivier, Kouga Local Municipality, Eastern Cape Province, is 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 35 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 activities), 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.: 043 492 1941) 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) (8) 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 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 COASTAL AREAS: guidelines and procedures for developers

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 m² 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 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

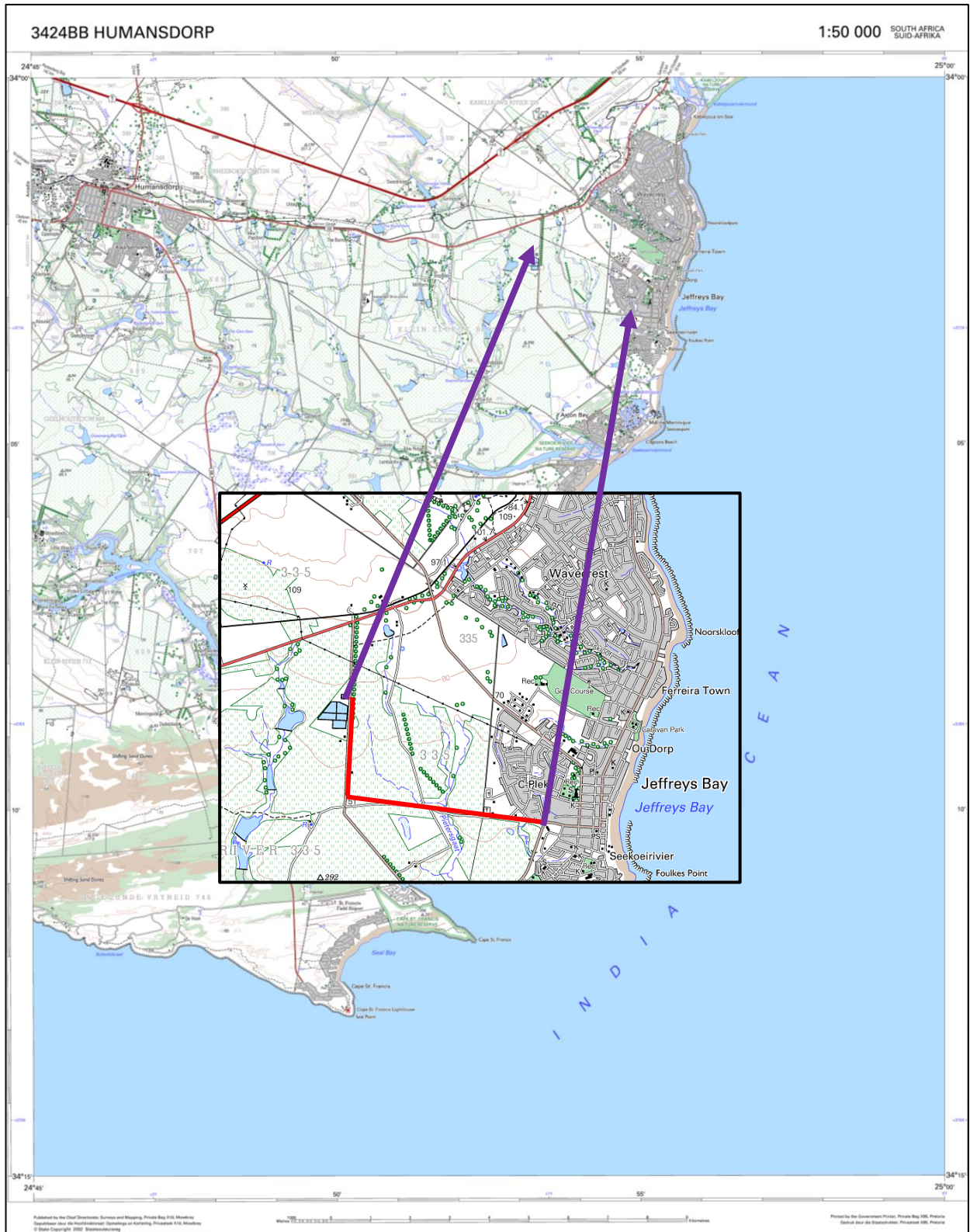
These are difficult for the layman to identify. However, large accumulations of flaked stones which do not appear to have been distributed naturally should be reported. If the stone tools are associated with bone remains, development should be halted immediately, and archaeologists notified.

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 shellfish. Others may resemble circular single row cobble stone markers. These occur in different sizes and may be the remains of windbreaks or cooking shelters.

Historical artefacts or features

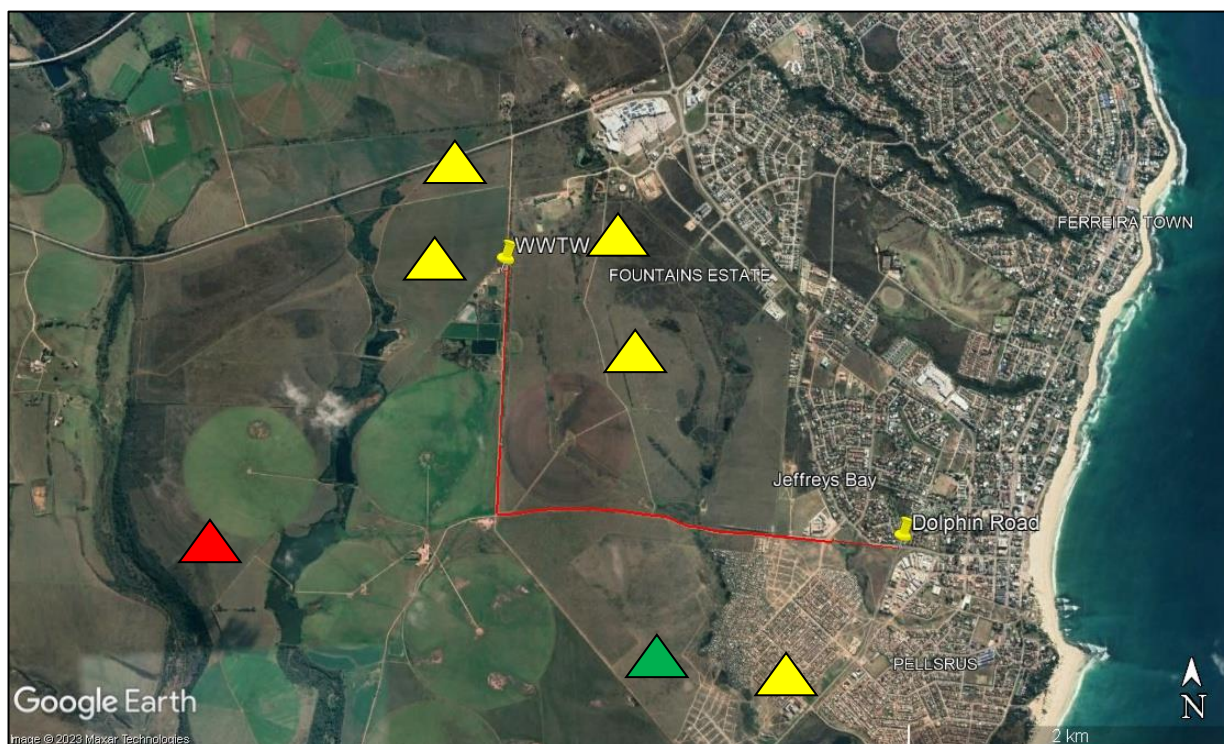
These are easy to identify and include foundations of buildings or other construction features and items from domestic and military activities.



Map 1. 1:50 000 Topographic maps indicating the approximate location of the proposed development area. The approximate pipeline route is indicated in red. The start point in Dolphin Drive and end point at the WWTW are indicated with the purple arrows.



Map 2. Aerial views of the general location of the proposed area for the upgrading of the Jeffrey's Bay Sewer Rising Main on Erf 1344 and Erf 913, Jeffrey's Bay, Portions 125, 1, 2 and 78 of the Farm Estate Klein Zeekoei Rivier (indicated in red). The WWTW is indicated with the yellow arrow.



Map 3. Aerial views of the general location of the proposed development area. The proposed pipeline route is indicated in red. Previous archaeological assessments that were conducted in close proximity to the proposed development area are indicated by the yellow squares (Binneman 2006a; 2006b; 2007; 2008c), the green square (Kruger 2017), and the red square (Webley 2006).