

23 July, 2014

Att: Mr Philip Hine
Heritage Officer: Archaeology
South African Heritage Resources Agency
PO Box 4637
Cape Town
8000

Dear MrHine,

RECOMMENDED EXEMPTION FROM AN ARCHAEOLOGICAL IMPACT ASSESSMENT

PROPOSED NAMAKWA MALL ON ERF 2883, SPRINGBOK (NAMA KHOI MUNICIPALITY), NORTHERN CAPE PROVINCE

Your letter to Ms Elanie Kühn of Pieter Badenhorst Professional Services CC, dated 22 May 2014, refers.

Erf 2883, which is owned by the Nama Khoi Municipality, is located within 500m of the N7 and directly adjacent the N14 (Kokerboom Road), inside the urban edge, in Springbok in the Namaqualand region of the Northern Cape Province (Figures 1-3).

The proposed business premises and commercial/retail development, to be known as the Namakwa Mall, entails the following activities:

- 41 shops;
- 1185 parking bays, walkways, a community swimming pool, and
- Engineering services including roads, potable water, storm water, sewerage, electricity, internal streets and lighting

Erf 2883 is a relatively large, vacant, gently sloping, plot (zoned Business) measuring 7.67 ha in extent.

The proposed development footprint area measures 6.5 ha in extent.

The subject property is bound by residential development to the north and north east and workshops in the south east. To the south is an open Erf and a road (N14) and to the west and open Erf and the N7.

According to the Botanical assessment of Erf 2883, the proposed development site is "highly disturbed with many footpaths, soil heaps, rubbish and soil erosion evident"¹.

Photographs taken by the Environmental Assessment Practitioner and the botanist indicate very clearly that the proposed development site is severely degraded (Figures 4-8). It comprises mostly bare soil. Piles of rock occur in places, and pedestrian traffic is extensive

¹ Final Basic Assessment Report, proposed development of a business premises on Erf 2883 Springbok. Reference: NC/BA/05/NAM/NAM/SPR1/2013 (NCP/EIA/0000205/2013). Pieter Badenhorst Professional Services CC.

over the proposed development site and surrounding area. Rubbish has been dumped on the property and soil erosion and sheet wash is also very visible.

There are no significant landscape features such as outcrops or rocky kopjes on the affected property.

A desk top study has shown that until very recently little archaeological work has taken place in the Springbok area, where most research has concentrated on the Namaqualand coast, the Richtersveld and further south in the Kamiesberg². With the development of an emerging alternative energy industry, however, several archaeological and Heritage Impact Assessments (HIA's) have taken place in the surrounding area, with mixed results. For example, only three stone flakes were encountered over a very large area during an HIA for a proposed wind energy farm near Springbok, where some faded rock art and a burial were also recorded³, while a few stone flakes were encountered in the proposed powerline servitude between Springbok and Nababeep during scoping for the same study. Low density scatters of Later Stone Age quartz flakes, chunks, a few cores and utilized pieces were documented by Kaplan⁴ alongside DR2595 near Bulletrap (about 15kms north of Springbok), during an assessment of several borrow pits. No pre-colonial archaeological remains were documented during a scoping study for a proposed pipeline between Rooiwinkel and Nababeep north of Springbok⁵, and between Okiep and Bulletrap alongside the N7⁶. A few stone tools of low significance, and a possible grave were encountered by Smith⁷ during a HIA for a proposed solar energy farm near Carolusberg east of Springbok, while ephemeral scatters of stone tools, a stone walled kraal, colonial artefacts and a possible grave were also encountered by Smith⁸ during a HIA for a proposed solar energy farm near Nababeep.

² Webley, L. 1992. The history and archaeology of pastoralist and hunter-gatherer settlement in the north-western Cape, South Africa. Unpublished D. Phil thesis: University of Cape Town.

Kaplan, J. 1993. The state of archaeological information in the coastal zone from the Orange River to Ponto do Ouro. Report prepared for the Department of Environmental Affairs & Tourism. ACRM Riebeeck West.

Dewar, G.I. 2007. The Archaeology of the Coastal Desert of Namaqualand, South Africa: A regional synthesis. Unpublished PhD Dissertation, Department of Archaeology, University of Cape Town.

³ Kaplan, J. 2010. Archaeological Impact Assessment for a proposed wind energy facility near Springbok, Northern Cape. Report prepared for DJ Environmental Consultants. ACRM, Cape Town.

⁴ Kaplan, 2008. An archaeological assessment of three proposed borrow pits alongside DR2595 N7 to Bulletrap, Northern Cape Province. Report prepared for Irme van Zyl Environmental Consultants.

⁵ Kaplan, 2011. Archaeological scoping the proposed construction of a new water pipeline between Rooiwinkel and Nababeep, Northern Cape. Report prepared for EnviroAfrica. ACRM Cape Town.

⁶ Kaplan, J. 2011. Archaeological scoping the proposed construction of a new pipeline between Bulletrap and Okiep, Northern Cape. Report prepared for EnviroAfrica. ACRM Cape Town

⁷ Smith, A. B. 2013. Proposed Solar PV Facility Melkboskuil Farm 132/6 Carolusberg: A Heritage Impact Assessment. Report prepared for Footprint Environmental Services.

⁸ Smith, A. B. Proposed Solar PV Facility Klipdam Farm 134/17 Springbok, Northern Cape: A Heritage Impact Assessment. Report prepared for Footprint Environmental Services.

No archaeological heritage was encountered by Gaigher⁹ during a HIA for a proposed solar energy farm south of Springbok and no pre-colonial archaeological traces were encountered by Morris¹⁰ during a survey of the proposed upgrading of the Goegap Nature Reserve facilities just a few kilometres outside Springbok east of the N7.

It is therefore clear that much of the Springbok area does not appear to be a sensitive, vulnerable or threatened archaeological landscape.

Since the proposed development site is already severely degraded, ACRM is therefore applying for exemption from having to conduct a Phase 1 Archaeological Impact Assessment of the proposed housing project, as requested by SAHRA.

The proposed Namakwa Mall is not considered to pose a serious threat to the local archaeological heritage because:

- The proposed development site is severely degraded (refer to Figures 4-8).
- It is considered unlikely that significant archaeological heritage will be impacted by proposed development activities.
- The desk top study has shown that Springbok and much of the surrounding area does not appear to be an archaeologically sensitive or threatened landscape.
- While some stone implements may be recovered from the proposed development site (i. e. Erf 2883), the significance of the finds are likely to be rated as having low significance.

It is therefore recommended that exemption from further specialist archaeological studies and mitigation be granted for the proposed Namakwa Mall development.

Should any unmarked human remains, or any bones, be exposed or uncovered during construction activities, the archaeologist (Jonathan Kaplan 082 321 0172), or the South African Heritage Resources Agency (Mr Phillip Hine 021 462 4502) must be immediately informed.

Yours sincerely



Jonathan Kaplan

⁹ Gaigher, S. 2012. Heritage Impact Assessment Report Basic Assessment, proposed establishment of the Brax Energy Photovoltaic Solar Park on a Portion of the Farm Voelklip near Springbok in the Northern Cape Province. Report prepared for Shawn Johnston Sustainable Future/Savannah Environmental

¹⁰ Morris, D. 2012. Archaeological Impact Assessment, Phase 1 for inclusion in Basic Assessment Report 25/2011. Proposed upgrading of the Goegap Nature Reserve near Springbok, Northern Cape. Report prepared for Van Zyl Environmental Consultants. McGregor Museum, Kimberly.

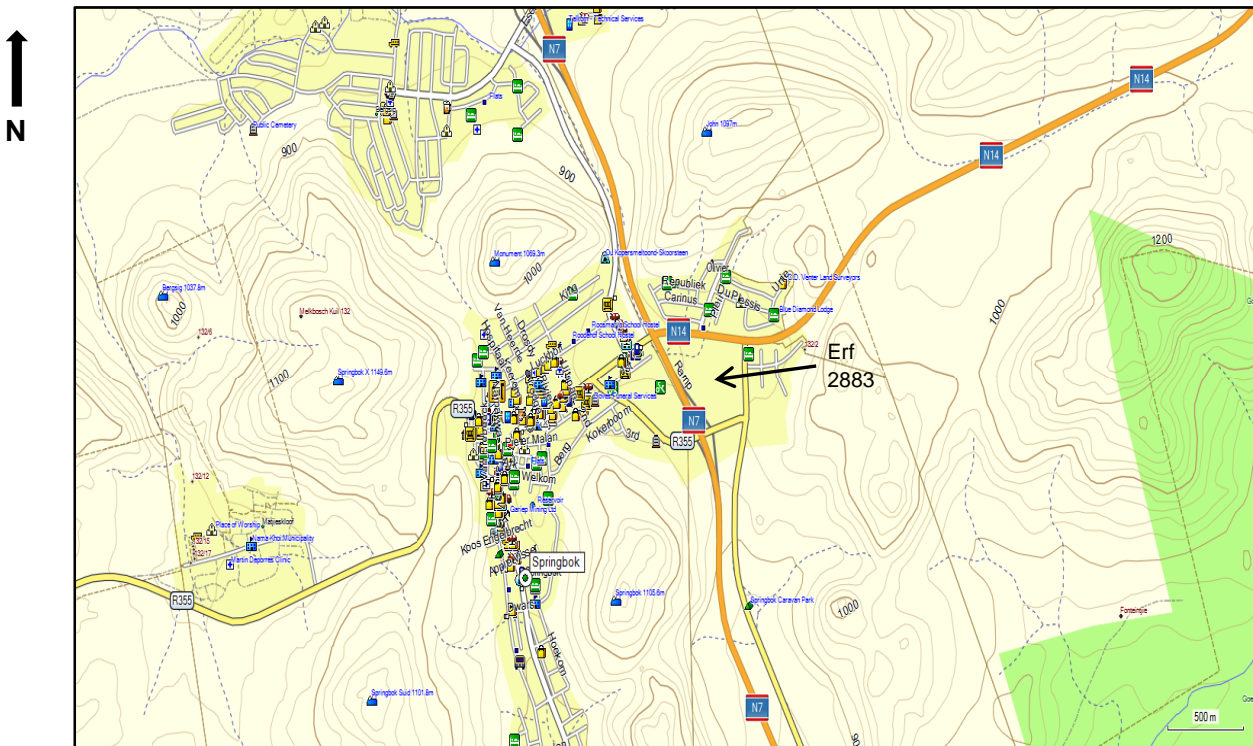


Figure 1. Locality Map.

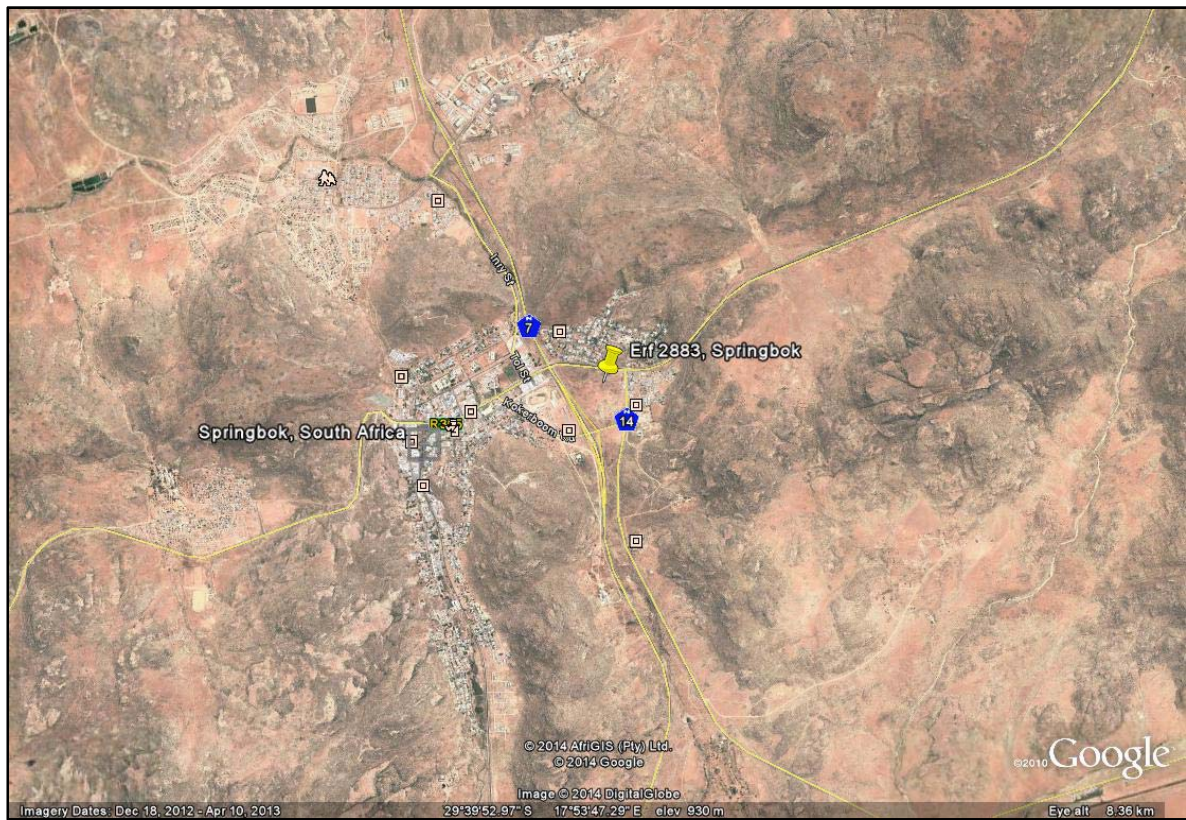


Figure 2. Google Earth map illustrating the location (Erf 2883) of the proposed development site of the proposed Namakwa Mall in Springbok

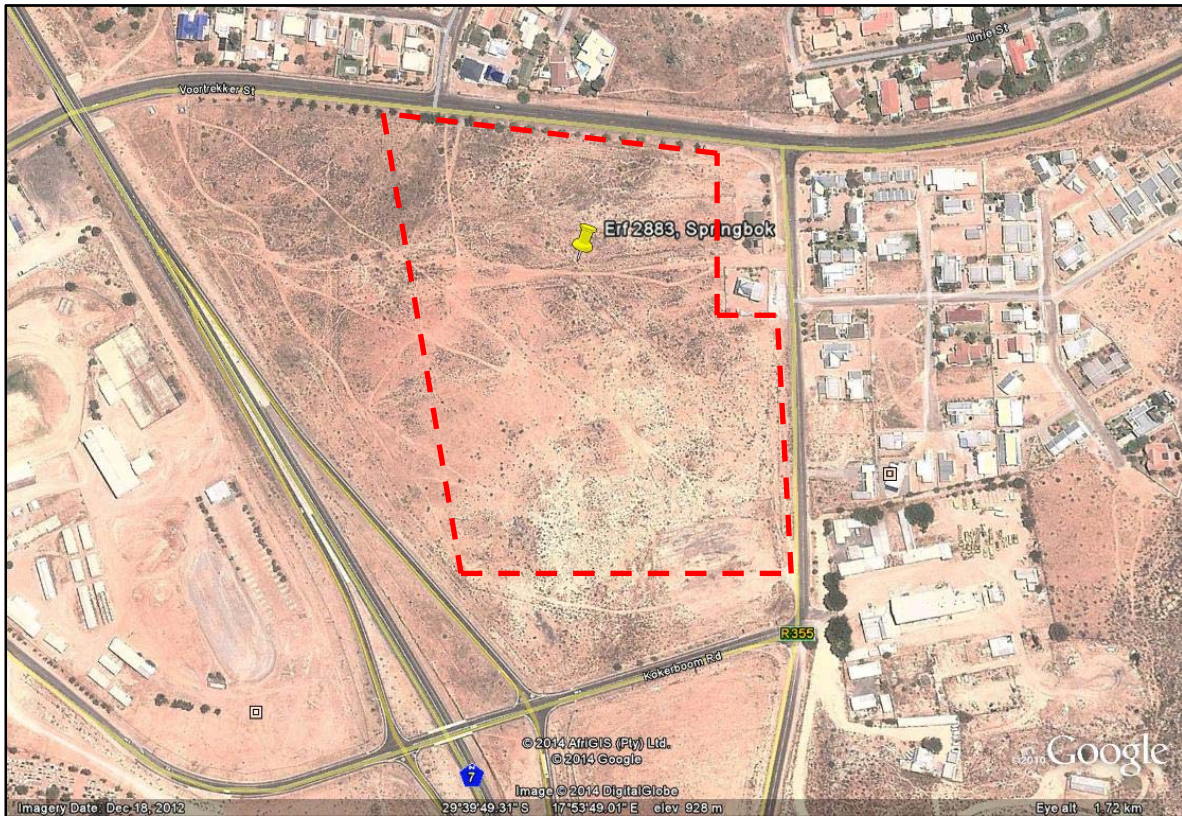


Figure 3. Google aerial map illustrating the approximate boundary of the of the proposed development site. Note the highly disturbed nature of the receiving environment



Figure 4. View of the proposed development site facing west.



Figure 5. View of the proposed development site facing north east



Figure 6. View of the proposed development site facing south west



Figure 7. View of the proposed development site facing south west



Figure 8. View of the proposed development site facing south west