

**A REVISED LETTER OF RECOMMENDATION (WITH CONDITIONS) FOR THE
EXEMPTION OF A FULL PHASE 1 ARCHAEOLOGICAL HERITAGE IMPACT
ASSESSMENT FOR THE PROPOSED CONSTRUCTION AND OPERATION OF 6
BREEDER HOUSE FACILITIES ON A PORTION OF PORTION 6, 10 AND 40 OF THE
FARM T'ZOETGENEUGD 192 IN THE SUNDAY'S RIVER VALLEY LOCAL
MUNICIPALITY OF THE EASTERN CAPE PROVINCE**

Prepared for: Public Process Consultants

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PROJECT INFORMATION

Type of development

The proposed development will include the construction and operation of six (6) breeder house facilities and associated infrastructure, measuring ~24ha, on a portion of Portion 6, 10 and 40 of the farm T'Zoetgeneugd 192 in the Sunday's River Municipality of the Eastern Cape Province (Maps 1-2).

Applicant

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Purpose of the study

The original proposal was to conduct a Phase 1 Archaeological Impact Assessment (AIA) of the proposed construction and operation of a poultry breeder house facility on a portion of Portion 6, 10 and 40 of Farm T'Zoetgeneugd 192 in the Sunday's River Municipality of the Eastern Cape Province. In addition, in order to secure water supply for the proposed development it is proposed that an existing irrigation water dam, located immediately east and adjacent to the proposed poultry breeder facility footprint, with a current storage capacity of 19 600m³(13 370m²), be expanded by 58 648m³ (15 225m²) to have a final development footprint of 39 035m² (3.9ha) and a total capacity to store 94 698m³ of irrigation water. Also, an existing dam, located in the far eastern portion of Portion 6, with a capacity to store 16 450m³ and a footprint measuring 10 140m² (1.01ha), is proposed to be decommissioned.

The purpose for requesting the proposed survey was to establish;

- the range and importance of possible exposed and *in situ* archaeological sites, features and materials,
- the potential impact of the development on these resources and,
- to make recommendations to minimize possible damage to these resources.

Site and Location

The proposed site for development is located within the 1:50 000 topographic reference map 3325DA Addo (Map 1). The property is situated on a portion of Portion 6, 10 and 40 of the farm T'Zoetgeneugd 192 in the Sunday's River Municipality of the Eastern Cape Province, ~4km south of the town of Addo, ~2km east of the R335 main road to Motherwell and about 200m(nearest point) from the Sunday's River (Maps 1-2) (General GPS reading: 33.35.980S; 25.42.501E). The area earmarked for development is situated on a flat floodplain and has been modified by current and historical agricultural activities.

ARCHAEOLOGICAL SCOPING REPORT

Assumptions and predictions

After the proposed project information received from Public Process Consultants was evaluated and a Google Earth image investigation was completed, a decision was made to exempt the proposed development from a full Phase 1 Archaeological Impact Assessment. The reason being that the entire site has already been modified by current and historical agricultural activities (Map 1). Furthermore, the results of several archaeological surveys in the immediate and wider region (for example Booth 2017 (1km from the site), Binneman and Reichert 2017 (3km northwest of the site) 2016a (2km southeast of the site), 2016b (3km southeast of the site) and 2010 (5km east of the site) were also taken into account. The experiences and knowledge gained from these and other investigations in the wider region provided background information to make assumptions and predictions on the potential 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.

It is predicted that a few Middle Stone Age stone tools in secondary context, similar to those observed during other surveys in the area, may be exposed during the proposed construction of breeder house facilities and associated infrastructure. The development will take place near the Sunday's River and there is a possibility that disturbed freshwater shell midden material may be exposed. There are no known graves or buildings older than 60 years on the site, but an informal burial ground was disturbed during the construction of a water channel ~1km west of the proposed development (Booth 2017). However, it is not anticipated that similar remains will be exposed on the site earmarked for development. In general, the area proposed for development appears to be of low cultural sensitivity and it is unlikely that any archaeological remains of any significance will be found *in situ* or exposed during the development.

References

- Binneman, J. and Reichert, K. 2017. A phase 1 archaeological impact assessment for the proposed agricultural expansion on the farm Lot De B Penhurst 123 in the Sunday's River Municipality of the Eastern Cape Province. Prepared for I.W. Terblanche & Associates. Stellenbosch. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J. and Reichert, K. 2016a. A phase 1 archaeological impact assessment for the proposed clearing of natural vegetation to expand the existing agricultural activities on the farm Zoetgenoegd No. 627 in the Sundays River Valley Municipality of the Eastern Cape Province. Prepared for I.W. Terblanche & Associates. Stellenbosch. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J. and Reichert, K. 2016b. A phase 1 archaeological impact assessment for the proposed agricultural expansion on portion 15 on farm 203 Logan Braes in the Nelson Mandela Bay Municipality of The Eastern Cape Province. Prepared for Public Process Consultants. Greenacres. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Binneman, J. 2010. A phase 1 archaeological heritage impact assessment for the proposed development of a leisure estate in the Sundays River Valley Area, Sundays River Municipality, Eastern Cape Province. Prepared for CEN Integrated Environmental Management Unit, Port Elizabeth. Eastern Cape Heritage Consultants. Jeffreys Bay.
- Booth, C. 2018. The rescue and reburial of burials from informal burial ground disturbed during construction work in preparation of citrus plantations on the farm Zoetgeneugd 192, near Addo, Sundays Valley Local Municipality, Eastern Cape Province. Prepared for Eastern Cape Provincial Heritage Resources Agency. Department of Archaeology. Albany Museum. Grahamstown.

DISCUSSION AND CONDITIONS

The proposed construction and operation of a poultry breeder house facility on a portion of Portion 6, 10 and 40 of Farm T'Zoetgeneugd 192 and associated infrastructure, including the proposed dam expansion on ~24ha will take place within an already modified environment and it is unlikely that significant heritage remains will be exposed. However, the proposed development will take place near to the Sunday's River in an area where one would expect to find freshwater shell middens. These are important archaeological sites and special care must be taken that these sites are not destroyed during development. Although it is unlikely that any significant archaeological heritage remains will be exposed during the development, 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 (Tel. 046 6222312) and/ or to the Eastern Cape Provincial Heritage Resources Authority (Tel. 043 7450888) immediately, so that a systematic and professional investigation can be undertaken. All work must stop to allow an archaeologist to conduct a systematic and professional investigation. 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

It is recommended that the proposed construction and operation of a poultry breeder house facility and associated infrastructure on ~24ha of Portion 6, 10 and 40 of Farm T'Zoetgeneugd 192 in the Sunday's River Valley Local Municipality of the Eastern Cape Province, is exempted from a full Phase 1 Archaeological Heritage Impact Assessment. The proposed area for development is of low cultural sensitivity and it is unlikely that any significant archaeological heritage remains will be exposed on the property. From an archaeological heritage perspective, 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 event of such finds being uncovered, (during any phase of construction work), it must be reported to the

archaeologist at the Albany Museum (Tel. 046 6222312) or to the Eastern Cape Provincial Heritage Resources Authority (Tel. 043 7450888) immediately. The applicant must finance the costs should additional studies be required as outlined above. The *onus* is also on the applicant 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.

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

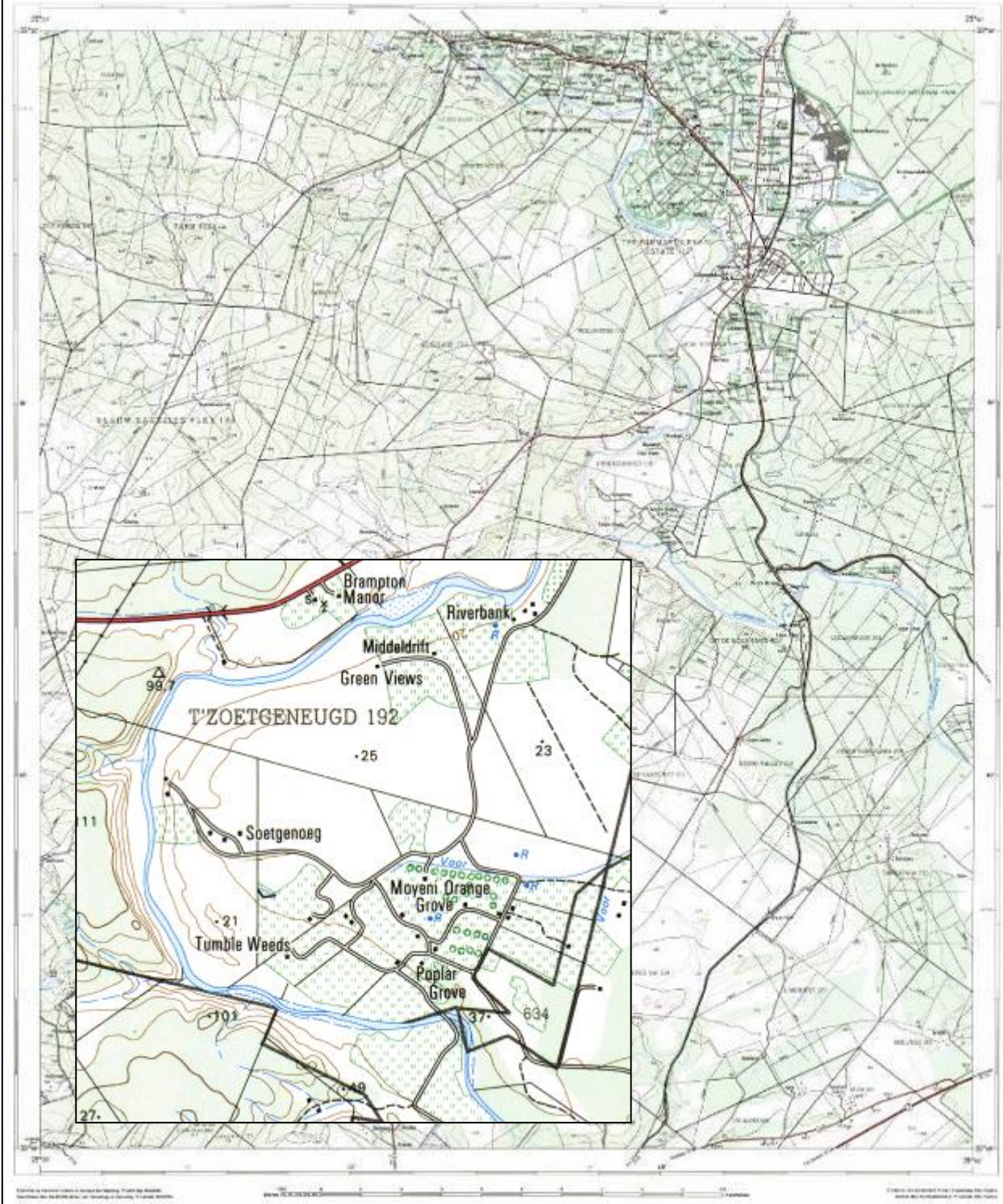
These are difficult for the layman to identify. However, large accumulations of flaked stones which do not appear to have been distributed naturally should be reported. If the stone tools are associated with bone remains, development should be halted immediately and archaeologists notified.

Fossil bone

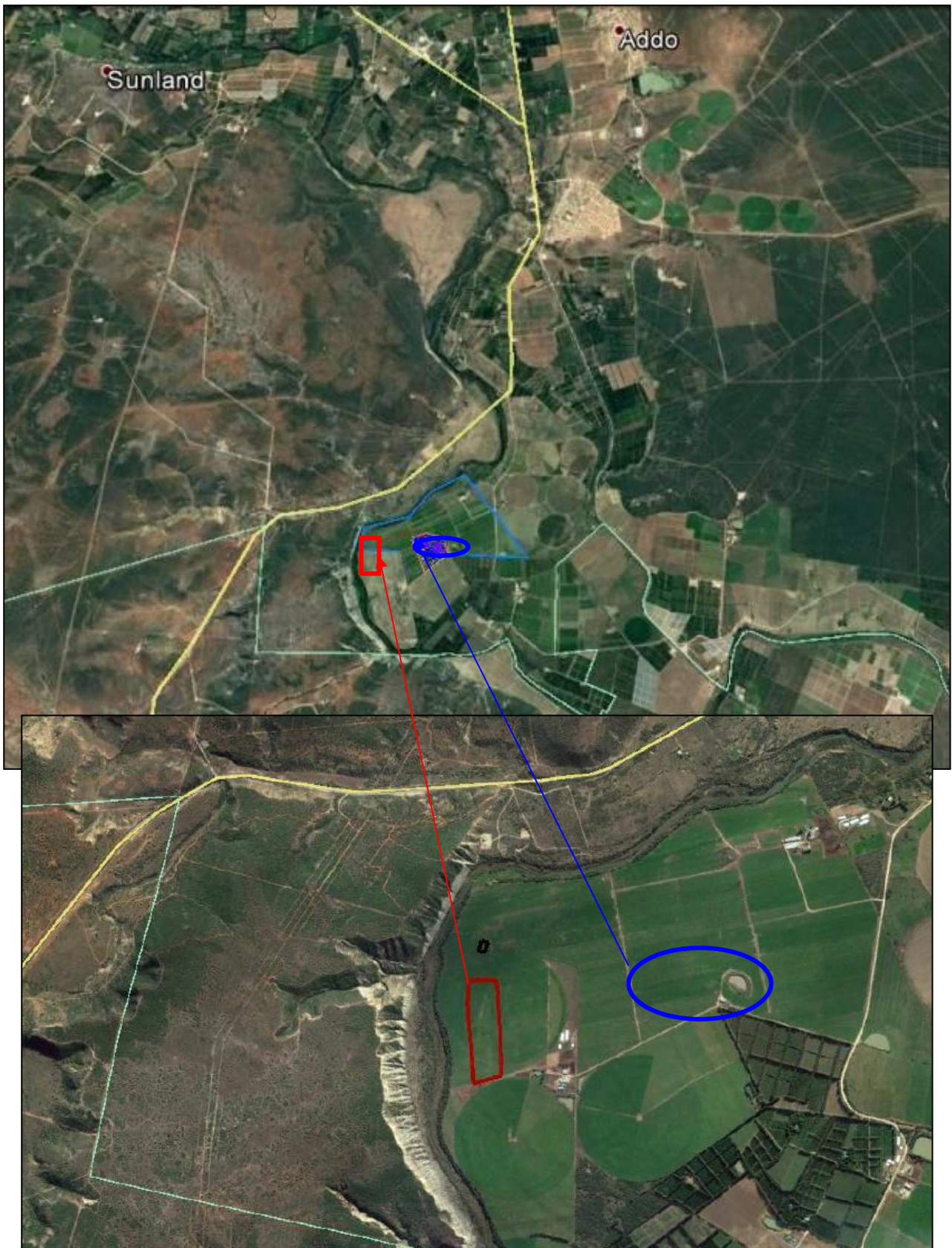
Fossil bones may be found embedded in geological deposits. Any concentrations of bones, whether fossilized or not, should be reported.

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 approximate location of the proposed development marked by the blue square. The red square marks the area where an informal burial ground was previously disturbed on the adjacent property.



Map 2. Aerial images indicating the location of the proposed development marked by the blue ovals. The red square marks the area where an informal burial ground was previously disturbed on the adjacent property.