HERITAGE WALKTHROUGH FOR THE UMSOBOMVU WEF AND ASSOCIATED INFRASTRUCTURE, MIDDELBURG AND NOUPOORT IN THE NORTHERN CAPE

FOR COASTAL ENVIRONMENTAL SERVICES

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By Gavin Anderson

Umlando: Archaeological Surveys and Heritage

Management

PO Box 10153, Meerensee, 3901

Phone/fax: 035-7531785 Fax: 0865445631

Cell: 0836585362



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Abbreviations

HP	Historical Period
IIA	Indeterminate Iron Age
LIA	Late Iron Age
EIA	Early Iron Age
ISA	Indeterminate Stone Age
ESA	Early Stone Age
WEF	Wind Energy Farm
OMS	Operations Management System
MTS	Main Transmission System
MSA	Middle Stone Age
LSA	Late Stone Age
HIA	Heritage Impact Assessment/Assessor
PIA	Palaeontological Impact Assessment

INTRODUCTION

Umlando undertook the heritage survey for the proposed Umsobomvu windfarm in 2014 (Anderson 2014). Subsequent to the initial report, the study area was divided into three aspects: Umsobomvu I Wind Energy Farm, Coleskop WEF and Eskom MTS. This walkthrough report deals with Umsobomvu 1WEF, Eskom MTS and the Operations Management System.

UMSOBOMVU WIND ENERGY FACILITY PROJECT DESCRIPTION (DFFE REFERENCE NUMBER: 14/12/16/3/3/2/730/AM2)

Umsobomvu Wind Power (Pty) Ltd is planning the development of the Umsobomvu Wind Energy Facility (WEF) and associated infrastructure near Middelburg and Noupoort in the Inxuba Yethemba Local Municipality (Eastern Cape Province) and the Umsobomvu Local Municipality (Northern Cape Province). The planned WEF development will include:

- The construction and operation of twenty-six (26) turbines, with the following specifications:
 - Hub height between 110 m and 135 m,
 - Clearance from the Ground between 30 m and 50 m, and
 - Rotor Diameter of between 160 m and 180 m.
- Access road off the N10, using the access road which was authorised under EA DFFE Reference No.: 14/12/16/3/3/1/2487. A combination of new and upgraded existing roads with a construction width of 12 m, which will be rehabilitated to 6 m during operations.
 - Underground cabling along the proposed roads.
 - One (1) 132 kV/33 kV connecting substation.
- Multiple 33 kV overhead lines (± 1.5 km) and a 132 kV (up to 1 km) overhead line to connect the IPP Substation to the Koruson MTS Substation.

- Operations, Maintenance and Services (OMS) Area [site office] of 150 m x 50 m.
 - Temporary infrastructure (construction phase only), including:
 - o Construction Compound area of 50 m x 40 m,
 - o Container storage area, and
 - Primary and secondary laydown area.

UMSOBOMVU INFRASTRUCTURE PROJECT DESCRIPTION (DFFE REFERENCE NUMBER: 14/12/16/3/3/1/2040)

Umsobomvu Wind Power (Pty) Ltd is planning the development of the Umsobomvu Infrastructure, associated with the Umsobomvu Wind Energy Facility (WEF), near Middelburg and Noupoort in the Inxuba Yethemba Local Municipality (Eastern Cape Province) and the Umsobomvu Local Municipality (Northern Cape Province). The planned development will include:

- The construction of new roads and upgrade of existing jeep tracks and farm roads, which will have a width of 12 m during the construction phase and will be rehabilitated to 6 m during the operational phase.
- The construction of one (1) concrete batching plant, temporary laydown area and construction area. This will consist of a concrete and/or steel batching plant of approximately 11 250 m², a temporary laydown area of approximately 22 500 m² and a construction compound area of approximately 11 250 m². The total area to be cleared will be 45 000 m² (4.5 ha).
- The construction of internal overhead lines with a 33 kV switching station of approximately 30 m x 30 m. The total area to be cleared for the switching station is approximately 900 m² (0.09 ha).
- The construction of a collector substation of up to 100 m x 100 m (1 ha).

These changes do not affect any of the sensitive areas and/or heritage sites recorded during the original survey. The mitigation remains the same as stated in the 2014 report... Fig 1 - 2 shows the final turbines, new access road and batching plants.

Umlando was requested to undertake the final HIA walkthrough in relation to the proposed roads and turbines. This was to ensure that no new sites occurred and that any site near the proposed development would have final and more accurate mitigation.

The following known sites fall within the footprint (fig. 3):

UMZ06

UMZ014

UMZ015

Weltevreden buildings

Several new features were noted during the walkthrough; however these will not affect the project.

FIG. 1 GENERAL LOCATION OF THE TURBINES & PROPOSED ACCESS ROADS

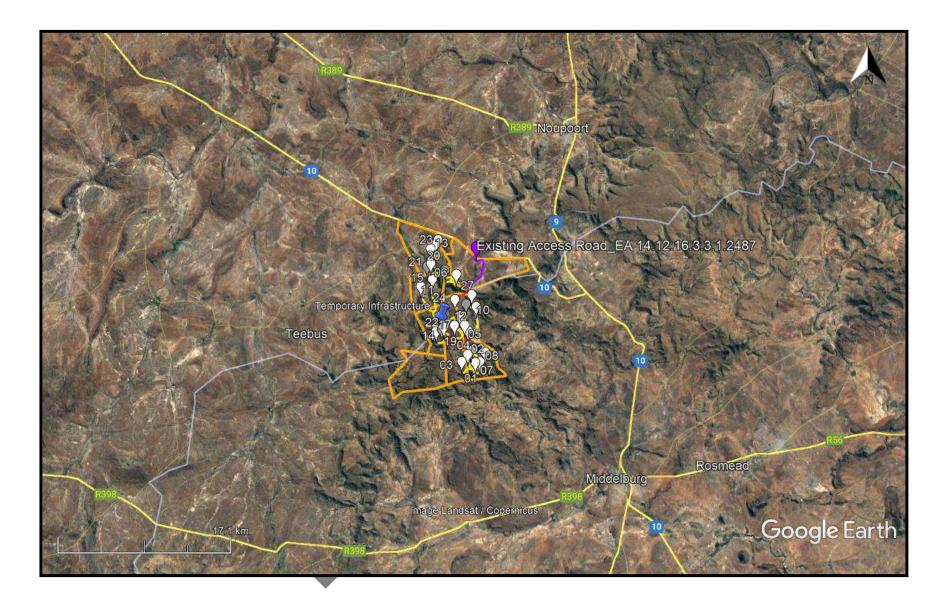


FIG. 2: AERIAL OVERVIEW OF THE TURBINE & ROAD LOCATIONS

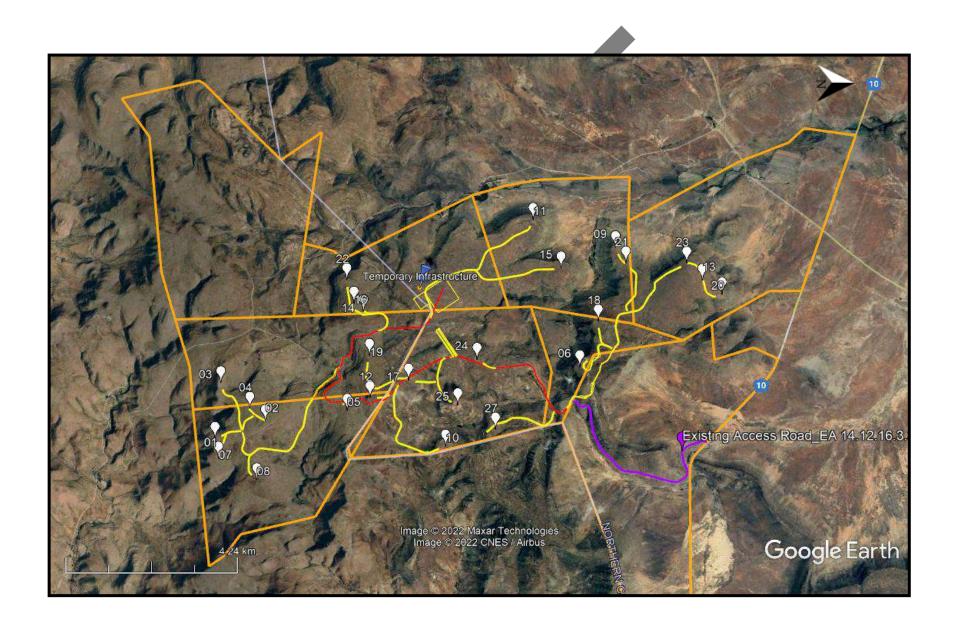
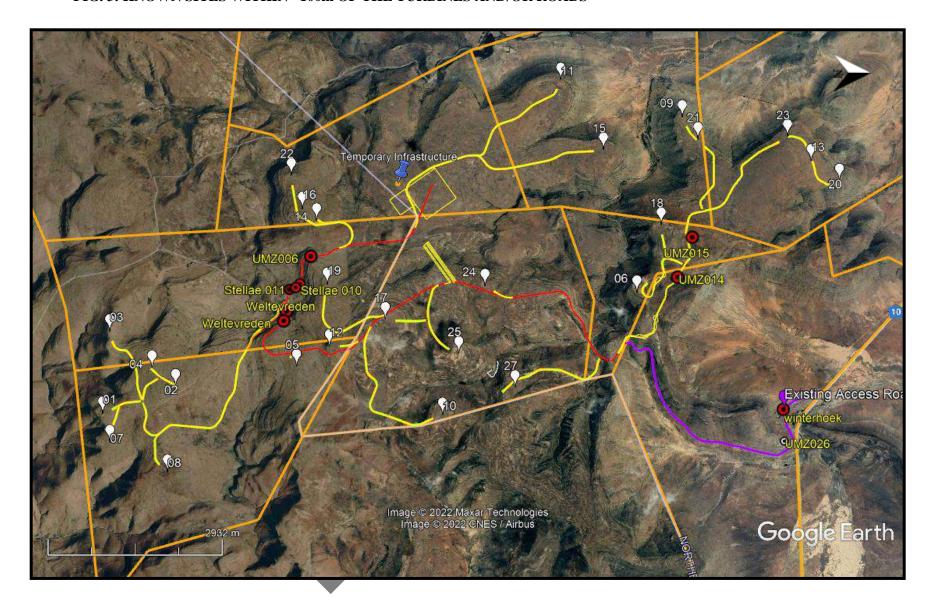


FIG. 3: KNOWN SITES WITHIN ~100m OF THE TURBINES AND/OR ROADS



NATIONAL HERITAGE RESOURCES ACT OF 1999

The National Heritage Resources Act of 1999 (pp 12-14) protects a variety of heritage resources. This are resources are defined as follows:

- "For the purposes of this Act, those heritage resources of South Africa which are
 of cultural significance or other special value for the present community and for
 future generations must be considered part of the national estate and fall within
 the sphere of operations of heritage resources authorities.
- 2. Without limiting the generality of subsection (1), the national estate may include—
 - 2.1. Places, buildings, structures and equipment of cultural significance;
 - 2.2. Places to which oral traditions are attached or which are associated with living heritage;
 - 2.3. Historical settlements and townscapes;
 - 2.4. Landscapes and natural features of cultural significance;
 - 2.5. Geological sites of scientific or cultural importance;
 - 2.6. Archaeological and palaeontological sites;
 - 2.7. Graves and burial grounds, including—
 - 2.7.1. Ancestral graves;
 - 2.7.2. Royal graves and graves of traditional leaders;
 - 2.7.3. Graves of victims of conflict;
 - 2.7.4. Graves of individuals designated by the Minister by notice in the Gazette;
 - 2.7.5. Historical graves and cemeteries; and
 - 2.7.6. Other human remains which are not covered in terms of the Human Tissue Act, 1983 (Act No. 65 of 1983);
- Sites of significance relating to the history of slavery in South Africa;
 - 3.1. Movable objects, including—
- Objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens;

- 4.1. Objects to which oral traditions are attached or which are associated with living heritage;
- 4.2. Ethnographic art and objects;
- 4.3. Military objects;
- 4.4. objects of decorative or fine art;
- 4.5. Objects of scientific or technological interest; and
- 4.6. books, records, documents, photographic positives and negatives, graphic, film or video material or sound recordings, excluding those that are public records as defined in section 1(xiv) of the National Archives of South Africa Act, 1996 (Act No. 43 of 1996).
- Without limiting the generality of subsections (1) and (2), a place or object is to be considered part of the national estate if it has cultural significance or other special value because of—
 - 5.1. Its importance in the community, or pattern of South Africa's history;
 - 5.2. Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
 - 5.3. Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
 - 5.4. Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
 - 5.5. Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
 - 5.6. Its importance in demonstrating a high degree of creative or technical achievement at a particular period;
 - 5.7. Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
 - 5.8. Its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa; and
 - 5.9. sites of significance relating to the history of slavery in South Africa"

METHOD

The method for Heritage assessment consists of several steps.

The first step forms part of the desktop assessment. Here we would consult the database that has been collated by Umlando. These database contain archaeological site locations and basic information from several provinces (information from Umlando surveys and some colleagues), most of the national and provincial monuments and battlefields in Southern Africa and cemeteries in southern Africa (information supplied by the Genealogical Society of Southern Africa). We use 1st and 2nd edition 1:50 000 topographical and 1937 aerial photographs where available, to assist in general location and dating of buildings and/or graves. The database is in Google Earth format and thus used as a quick reference when undertaking desktop studies. Where required we would consult with a local data recording centre, however these tend to be fragmented between different institutions and areas and thus difficult to access at times. We also consult with an historical architect, palaeontologist, and an historian where necessary.

The survey results will define the significance of each recorded site, as well as a management plan.

All sites are grouped according to low, medium, and high significance for the purpose of this report. Significance ratings are discussed below in Table 1. Sites of low significance have no diagnostic artefacts or features. Sites of medium significance have diagnostic artefacts or features and these sites tend to be sampled. Sampling includes the collection of artefacts for future analysis. All diagnostic pottery, such as rims, lips, and decorated sherds are sampled, while bone, stone, and shell are mostly noted. Sites of high significance are excavated and/or extensively sampled. Those sites that are extensively sampled have high research potential, yet poor preservation of features.

Defining significance

Heritage sites vary according to significance and several different criteria relate to each type of site. However, there are several criteria that allow for a general significance rating of archaeological sites.

These criteria are:

1. State of preservation of:

- 1.1. Organic remains:
- 1.1.1. Faunal
- 1.1.2. Botanical
- 1.2. Rock art
- 1.3. Walling
- 1.4. Presence of a cultural deposit
- 1.5. Features:
- 1.5.1. Ash Features
- 1.5.2. Graves
- 1.5.3. Middens
- 1.5.4. Cattle byres
- 1.5.5. Bedding and ash complexes

2. Spatial arrangements:

- 2.1. Internal housing arrangements
- 2.2. Intra-site settlement patterns
- 2.3. Inter-site settlement patterns

3. Features of the site:

- 3.1. Are there any unusual, unique or rare artefacts or images at the site?
- 3.2. Is it a type site?
- 3.3. Does the site have a very good example of a specific time period, feature, or artefact?

4. Research:

- 4.1. Providing information on current research projects
- 4.2. Salvaging information for potential future research projects

5. Inter- and intra-site variability

- 5.1. Can this particular site yield information regarding intra-site variability, i.e. spatial relationships between various features and artefacts?
- 5.2. Can this particular site yield information about a community's social relationships within itself, or between other communities?

6. Archaeological Experience:

6.1. The personal experience and expertise of the heritage practitioner should not be ignored. Experience can indicate sites that have potentially significant aspects, but need to be tested prior to any conclusions.

7. Educational:

- 7.1. Does the site have the potential to be used as an educational instrument?
 - 7.2. Does the site have the potential to become a tourist attraction?
- 7.3. The educational value of a site can only be fully determined after initial test-pit excavations and/or full excavations.

8. Other Heritage Significance:

- 8.1. Palaeontological sites
- 8.2. Historical buildings
- 8.3. Battlefields and general Anglo-Zulu and Anglo-Boer sites
- 8.4. Graves and/or community cemeteries
- 8.5. Living Heritage Sites
- 8.6. Cultural Landscapes, that includes old trees, hills, mountains, rivers, etc related to cultural or historical experiences.

The more a site can fulfill the above criteria, the more significant it becomes. Test-pit excavations are used to test the full potential of an archaeological deposit. This occurs in Phase 2. These test-pit excavations may require further excavations if the site is of high significance (Phase 3). Sites may also be mapped and/or have artefacts sampled as a form of mitigation. Sampling normally occurs when the artefacts may be good examples of their type, but are not in a primary archaeological context. Mapping records the spatial relationship between features and artefacts.

The above significance ratings allow one to grade the site according to SAHRA's grading scale. This is summarised in Table 1.

TABLE 1: SAHRA GRADINGS FOR HERITAGE SITES

SITE SIGNIFICANCE	FIELD GRADE RATING				
High Significance	National Significance	Grade 1	Site conservation / Site development		
High Significance	Provincial Grade 2 Significance				Site conservation / Site development
High Significance	Local Significance	Grade 3A / 3B			
High / Medium Significance	Generally Protected A		Site conservation or mitigation prior to development / destruction		
Medium Significance	Generally Protected B		Site conservation or mitigation / test excavation / systematic sampling / monitoring prior to or during development / destruction		
Low Significance	Generally Protected C		On-site sampling monitoring or no archaeological mitigation required prior to or during development / destruction		

FIELD SURVEY

The field walkthrough occurred in September 2021. The vegetation in the area had been recently burnt (over the last 1 - 2 years) and had allowed for greater visibility, for stone scatters. The general pattern of the roads is that of one main access road, via the N10, then the roads will access the turbines via the top of the hills in most places. As noted on previous surveys, these are areas that were not inhabitated by historical communities. Isolated stone tools occur in the higher area, but it appears that human occupation is restricted to approx. a max of 1800m asl. The original surveys concentrated on turbine locations and provisional access roads, while

this survey concentrated on the final access roads and related electrical infrastructures

All sites within 100m of the proposed roads and electrical infrastructures were revisited and/or resurveyed. The substations and electrical line corridor was also resurveyed. Several new sites and/or features were recorded and these are shown in fig. 4 and Table 2.

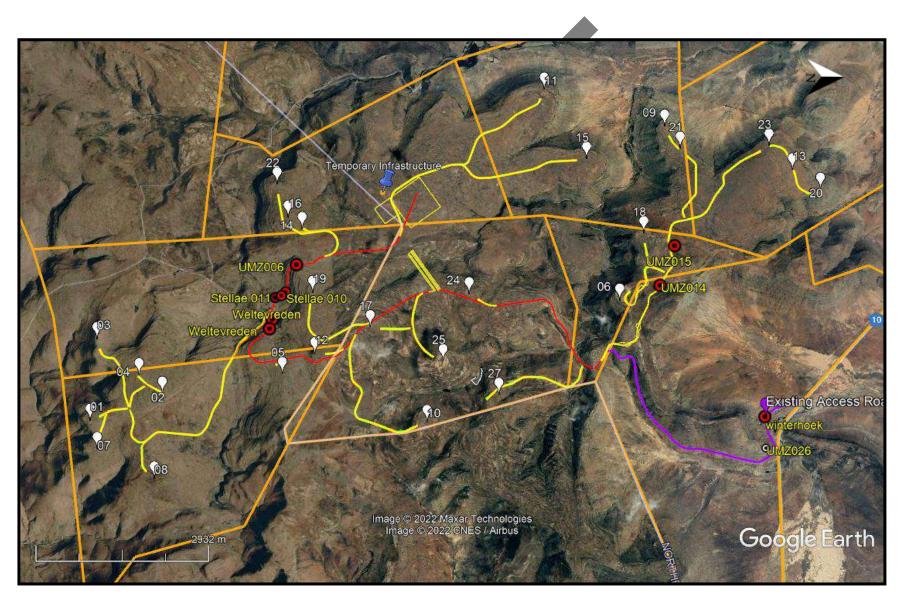
The sites can be grouped into categories:

- Open stone tool scatters: UMZ06, UMZ014, UMZ015, UMZ026
- Farm Buildings and their middens: Weltevreden, Winterhoek
- Stone walling: Winterhoek, UMZ029
- Stellae: Stellae 10 12

TABLE 2: RECORDED SITES

Name	Latitude	Longitude	Alt. (M)	Description	Required Mitigation
Stellae 10	-31.373772856	24.836823222	1776	Boundary	Remove &
Stellae 11	-31.374386357	24.837429549	1772	marker Boundary marker	relocate Remove & relocate
Stellae 12	-31.375321288	24.837760939	1774	Boundary marker	Remove & relocate
UMZ006	-31.372089610	24.832105134	1794	Stone tool Scatter	Permit
UMZ014	-31.318343650	24.836304815	1732	stone tools	Not affected
UMZ015	-31.316045032	24.829452560	1709	quarry and knapping	Not affected
UMZ026	-31.300954606	24.864783701	1569	Stone tool Scatter	Sampling & Permit
UMZ029	-31.379286386	24.846841327	1838	Stone tool Scatter	Permit
Weltevreden Barn	-31.376077355	24.840326987	1779	Historical building	Not affected
Weltevreden	-31.376118349	24.843093585	1812	labourers' houses	Not affected
Weltevreden midden	-31.375985022	24.843461251	1816	Historical midden	Sample & Permit
Winterhoek	-31.302260980	24.859495014	1556	Historical building	Not affected

FIG. 4: LOCATION OF RECORDED SITES WITH THE 100M BUFFER



STONE TOOLS SCATTERS

UMZ006

The site is located at the head of a valley at ~1800m asl. The site consists of a flat area with several small overhangs just above the stone scatters. These shelters do not have any archaeological deposit (fig. 5). The artefacts are found at the base of the hill towards the edge of the cliffs in a sandy soil. The scatters have been slightly affected by an Eskom transmission line. The stone tools appear to be concentrated in a specific area at the top of a kloof.

The stone tools are all made from hornfels and have similar patination. The tools include:

- Duck billed scraper
- Medium end scrapers
- Utilised flakes
- Utilised Blade
- General flakes
- Bladelet core
- Irregular cores

The stone tools can date between the terminal Pleistocene and early Holocene. The tools are located in a secondary context.

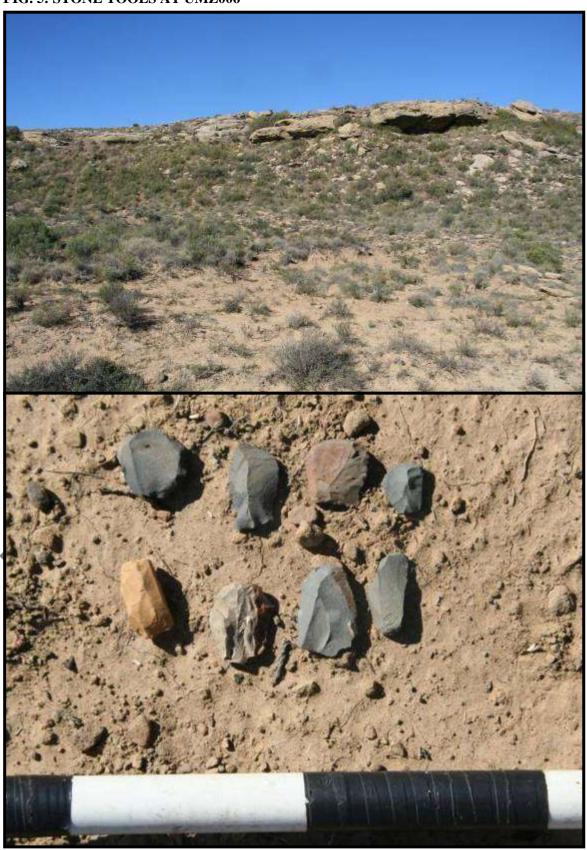
The site will be affected by access road. The access road has limited space and cannot avoid the stone scatters.

Significance: The site is of low significance. All of the tools are in a secondary context and have little research value.

Mitigation: No further mitigation is required. A permit will be required from ECHPRA as the road will remove the stone tools..

SAHRA Rating: 3C

FIG. 5: STONE TOOLS AT UMZ006



UMZ014

The site is located at the base of a small koppie on the mountain (fig. 6). There is an ephemeral scatter of stone tools over an area 60m x 50m in size. The tools appear to be in a secondary context, and are made from hornfels. The tools date to the MSA and consist of irregular cores, flakes (with/out a prepared platform) and unifacial points of varying sizes (fig. 7)

Significance: The site is of low significance.

Mitigation: No mitigation is required, however a permit will be required as the access road affects part of the site.

SAHRA Rating: 3C

FIG. 6: GENERAL VIEW OF UMZ014







UMZ015

The site is located ~800m downhill from UMZ014 (fig. 8). The site is situated at the flattened base of a small hill and extends over an area of 50m x 80m. The site consists of naturally occurring outcrop of loose hornfels rocks. Many of the smaller rocks have been used for cores to produce flakes. There appears to be substantially more cores than flakes in the area. The site is thus mostly a quarry site, although some stone tool knapping did occur. The site appears to date to the MSA and LSA. Given the size of the cores, it is unlikely that many are in a secondary context.

The access road occurs ~75m south of the site and will thus not affect the main part of the site.

Significance: The site is of low-medium significance as it may yield information regarding quarrying and knapping techniques

Mitigation: No mitigation or permit is currently required. If the access road is moved then mitigation in terms of sampling and a permit will be required.

SAHRA Rating: 3B



UMZ026

UMZ026 is a new site located near the N10. The site appears to be a stone tool knapping site that extends for about 30m around a hornfels outcrop (fig. 9). The outcrop overlooks the top of a small kloof on the opposite side of the N10. UMZ026 was noted due to the recent fire clearing the undergrowth. I had previously noted a few tools in the track and thought of them as part of the colluvial deposits of the general area. However, the fire shows that it is restricted to a small area and related to the hornfels outcrop.

The stone tools consists of MSA cores, various (utilized) flakes and points (spear heads). Several of these MSA flakes have been re-utilised in the LSA. Figure 10 shows some of these tools.

The site was originally not going to be affected; however a new access road has been proposed. This access road will go through most of the site.

Significance: The knapping area is of low-medium significance. Several have been reported by Sampson (1985) in the general area, e.g. SAM1 (see Anderson 2014).

Mitigation: The site should be sampled and photographed if the access road affects it. Sampling would occur over a two day period. A permit to damage this site will be required.

SAHRA Rating: 3B

FIG. 9: LOCATION OF UMZ0216

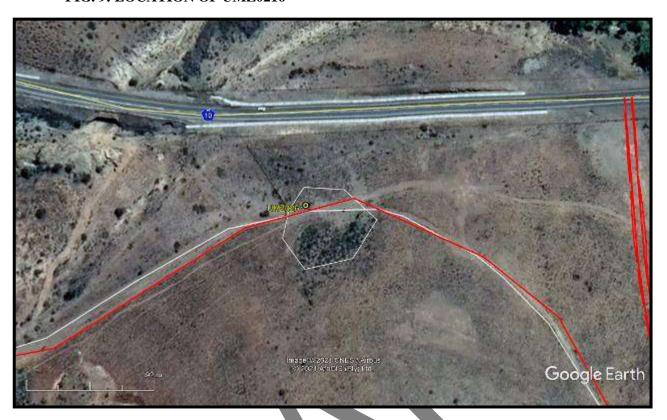
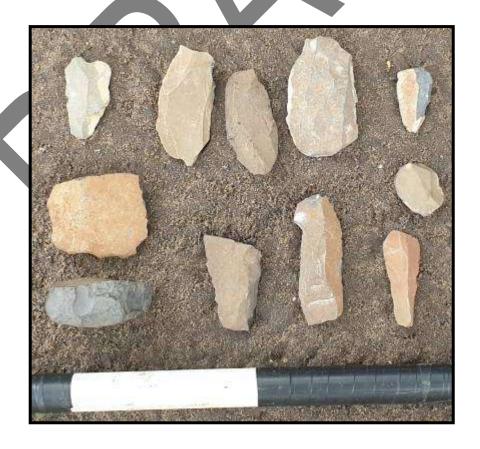


FIG. 10: SELECTED STNE TOOLS FROM UMZ026



FARM BUILDINGS AND THEIR MIDDENS

Weltevreden

The farm buildings at Weltevreden will not be directly affected by the road. The buildings consists of the main farm house and two buildings, the main barn and then two farm labourers' houses (fig. 11). None of the buildings will be affected; however the road footprint occurs 7m west of the barn along an existing farm road (fig. 12). The farm labourers' houses are 17m south of the road (fig. 13). No artefacts were noted around the barn where it will be affected by the road.

There is a flat area uphill of the farm labourers' houses that appears to be a platform. This area had been recently burnt and no foundations were visible. However, there are several artefacts on the surface that indicate that a midden over 60 years occurs on the site. Initial inspection suggests some late 19th century artefacts. The artefacts include European ceramics, bottles, glass wear, tins, a sad iron (the old metal irons that were heated on coals), bicycle parts, etc.

Significance: The entire farm complex is representative of 19th to 20th century farms of the general area. The occurrence of middens is important as it is indicative of the lives of the people. Some of the early artefacts ath this midden could relate to the transfer print ceramics at the finger painted rock art site. This would show a connection between the farm labourers and the use of rock art sites for cultural purposes. The people who painted the finger paintings would eventually have become farm labourers or lived on the farm.

The middens can also indicate the level of interaction between the landowner/commercial shops and the labourers themselves. Since no middens like these have been studied before, this midden is of medium significance for its potential.

The barn should not be affected; otherwise a permit will be required.

Mitigation: The vegetation at the platform needs to be burnt and then systematically sampled over two to three days. There does not appear to be a deep deposit. Depending on the type of road clearance used, the area might be monitored during construction phase as well.

The barn and the labourers' houses need to be clearly demarcated as no go areas before construction begins.



FIG. 11: LOCALITY OF WELTEVRDEN FEATURES IN RELATION TO THE ROAD

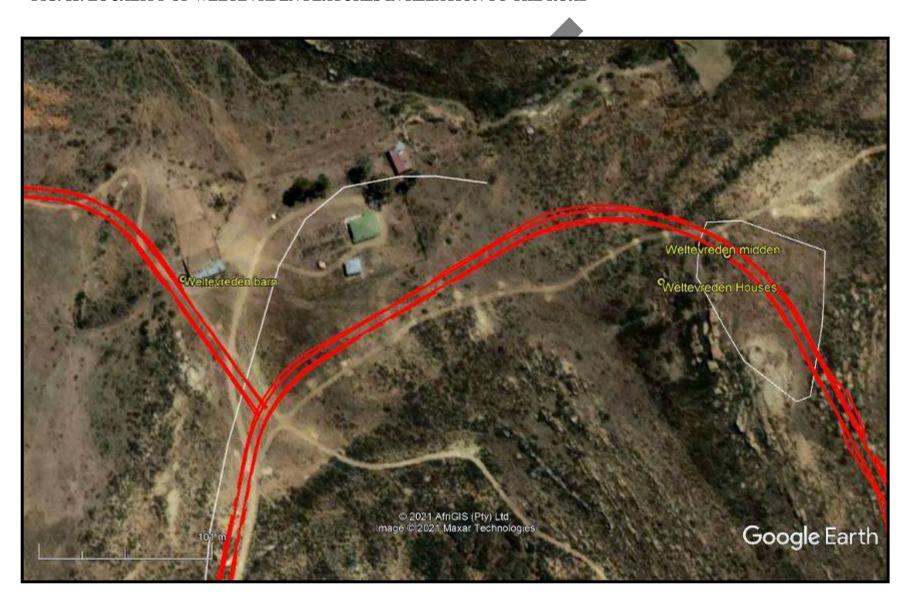


FIG. 12: WELTEVREDEN BARN AND CURRENT ROAD



FIG. 13: WELTEVREDEN LABOURERS' HOUSES FROM THE MIDDEN



Winterhoek

The access road was originally not going to pass the farm Winterhoek. However a realigned access road might pass within 15m of the rectangular stone walled kraal (fig. 14). There is currently a fence between the kraal and the road and this should be used as the buffer.

Significance: The stone walled kraal is of low significance, but forms part of the farm complex and vernacular architecture.

Mitigation: The kraal needs to be clearly demarcated as a no go area before construction begins. If the building is to be damaged, then a permit will be required.

SARHA Rating: 3C

FIG. 14: STONE WALLED KRAAL AT WINTERHOEK



STONE WALLING

UMZ029

UMZ029 is located on a small sandstone overhang that is 1m high, 2m wide and 1m deep. The site consists of roughly packed stone walling on each side of the overhang (fig. 15). No artefacts were noted in the vicinity of the shelter. These types of shelters tend to be temporary shelters for sheep or herders and are quite common.

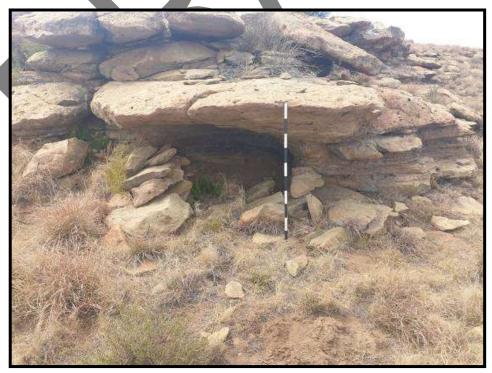
The shelter will be affected by the southern buffer of the road.

Significance: The feature is of low significance.

Mitigation: No mitigation is required as the shelter has been photographed and recorded. A permit for the destruction of a historical built structure will be required. Alternatively the road is moved 20m to the north.

SARHA Rating: 3C





STELLAE

Stellae are, in this case, stone slabs that form part of the original farm boundary markers, or its subdivisions. Stellae form part of the cultural landscape and are protected by the NHRA. They are indicators of methods of land management for live stock as they can also show the sizes of pastures

Stellae 10 – 12 are on the farm Weltevreden and will be affected by the road (fig. 16). The stellae are the end and mid points for a line of stellae at this section. This is the main access road for the windfarm and these would need to be mitigated. These stellae line up with the subdivisions of the 1972 topographical map

Significance: Stellae are significant in that they record (original) farm boundaries that might not show up on the various maps. They are however of medium significance.

Mitigation: Stellae 10 – 12 might be affected by the road. I suggest that they are moved to the boundary of the footprint (+2m) and re-inserted. The coordinates of the original and new locations need to be taken, and photographed. The stellae should be removed before road construction occurs, and re-inserted AFTER the road has been completed. This will require a permit.

SARHIS Rating: 3B.

FIG. 16: STELLAE 10 - 12



MANAGEMENT PLAN

Open stone tool scatters (UMZ06, UMZ014, UMZ015, UMZ026) are not of high significance. Only UMZ026 should be sampled as it is a stone knapping site and might differ to the normal concentrations of stone tools that are in a secondary context. UMZ014 and UMZ015 will not be affected by the access road. A permit to damage general stone tool concentrations in total should be obtained; else it can be site specific.

The farm buildings and related infrastructure are representative of the vernacular architecture of the area. They cannot be affected in any manner. A permit would be require a permit and further detailed assessment by a built environment specialist if affected by the development. To counter potential damage, all buildings within 50m of the road buffers should be clearly demarcated prior to construction and designated as no-go areas. A permit to damage any built structure will be required; however, since these will not be damaged no permit will be required.

The scattered midden behind the Weltevreden farm labourers' houses needs to be sampled before construction begins. Both the sampling and damage to the midden will each require a permit. Sampling needs to be undertaken by a qualified archaeologist.

Stone walling at the overhang kraal (UMZ029) is of low of significance and part of the general cultural landscape. A permit for UMZ029 will be required.

Stone stellae are boundary and fence markers and were used instead of wooden poles. They form part of the cultural landscape and show how farms, their subdivisions and various pasturage fields were used. One clusters of stellae occur in the study area, at the farm Weltevreden. This cluster occurs

in an area where little room is available for re-aligning the road. In this scenario, I suggested that the stellae to be affected are recorded and removed from the road. Once total construction is completed, they should be re-inserted as close to the original position as possible. The new locations should be recorded.

CONCLUSION

A heritage walkthrough for the Umsobomvu WEF was undertaken in September 2021. The aim of the walkthrough was to ensure that any heritage sites occurring within the final footprints are managed accordingly. A fire occurred in the study area since the initial survey, and this allowed for greater archaeological visibility. While no large, or important sites, were noted, several smaller features were more visible. These included stone tool scatters and a knapping area, historical middens, and stone walling.

All affected sites will require a permit from SAHRA to be (partially) damaged and/or destroyed. The middens and stone knapping area will require sampling permits.

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EXPERIENCE OF THE HERITAGE CONSULTANT

Gavin Anderson has a M. Phil (in archaeology and social psychology) degree from the University of Cape Town. Gavin has been working as a professional archaeologist and heritage impact assessor since 1995. He joined the Association of Professional Archaeologists of Southern Africa in 1998 when it was formed. Gavin is rated as a Principle Investigator with expertise status in Rock Art, Stone Age and Iron Age studies. In addition to this, he was worked on both West and East Coast shell middens, Anglo-Boer War sites, and Historical Period sites.

DECLARATION OF INDEPENDENCE

I, Gavin Anderson, declare that I am an independent specialist consultant and have no financial, personal or other interest in the proposed development, nor the developers or any of their subsidiaries, apart from fair remuneration for work performed in the delivery of heritage assessment services. There are no circumstances that compromise the objectivity of my performing such work.

Gavin Anderson

Archaeologist/Heritage Impact Assessor