

A LETTER OF RECOMMENDATION (WITH CONDITIONS) FOR THE EXEMPTION OF A FULL PHASE 1 ARCHAEOLOGICAL HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED CONSTRUCTION OF THE CHABA BATTERY STORAGE FACILITY ON PORTION 1 AND 3 OF FARM 162 NEAR KOMGA WITHIN IN THE GREAT KEI LOCAL MUNICIPALITY OF THE EASTERN CAPE PROVINCE



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Date: October 2020

PROJECT INFORMATION

The proposed development of the Chaba Battery Storage Facility (Maps 1-2) will be no more than 4 hectares and it will comprise of the following:

- Up to 115 containers (each up to 40m²), each with a capacity of up to 4MWh and on a concrete platform. These will house the batteries, management system and auxiliaries.
- Up to 60 transformer stations (up to 35m² each).
- Up to an additional 10m² per container for cooling units.
- Internal access roads up to 8m wide between rows of containers (Existing roads will be used as far as possible. However, where required, internal access roads will be constructed.
- Medium voltage cabling between containers and the switching station of up to 33kV
- Either overhead power lines (roughly 1km) or underground to connect the facility to the electrical grid.
- Temporary infrastructure including a site camp and a laydown area of approximately 0.3ha.
- The Chaba Battery Storage Facility will connect to the Eskom Chaba substation (see yellow placemark on Map 2).

Proponent

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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 construction of a Battery Storage Facility on Portion 1 and 3 of Farm 162 near Komga within the Great Kei Local Municipality of the Eastern Cape Province, 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 area for the construction of the Battery Storage Facility is located within the 1:50 000 topographic reference map 3227DB Komga (Map 1). The proposed activity will take place on Portion 1 and 3 of Farm 162 near Komga in the Great Kei Local Municipality, Eastern Cape Province (Map 2). It is situated approximately 11 kilometres south-east from Komga in close proximity to the N2 national road. The area is covered by dense grass and has been disturbed in the past by the construction of the Chaba substation and several power lines that runs across the property (Figure 1). A general GPS reading for the proposed area is: 32.37.177S, 27.57.605E.

Relevant Archaeological Impact Assessments

- Anderson, G. 2010. Heritage survey of the proposed Chaba Wind Energy project, Thornham (Farm 25), Komga. Prepared for Coastal Environmental Services. Umlando: Archaeological tourism and resources management. Meerensee.
- Binneman, J. 2009. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological heritage impact assessment for the proposed re-use of the existing abandoned quarry on portion 13 of farm 26 and additional stockpiling area on the remainder of the adjacent farm 10, Komga District, Amathole District Municipality, Eastern Cape Province. Prepared for Site Plan Consultants. Strand. Albany Museum. Grahamstown.
- Binneman, J and Booth, C 2008. A letter of recommendation (with conditions) for the exemption of a full phase 1 archaeological heritage impact assessment for the proposed granite mine on the farm Castleton No. 53, Komga, Amathole District Council, Eastern Cape Province. Prepared for Terreco cc. Geotechnical, Environmental and Waste Management Services. Tecoma. Albany Museum. Grahamstown.
- Van Ryneveld. 2017. Phase 1 Archaeological and Cultural Heritage Impact Assessment. Upgrade of the National Route R63 Section 16 between the N6 [km 1,00] and the N2 intersection east of Komga [km 43,64], Great Kei Local Municipality, Eastern Cape. Prepared for EOH - Coastal and Environmental Services, East London. Archaeomaps Consultancy. Beacon Bay.

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 by an archaeologist. GPS readings were taken with a Garmin and all important features were digitally recorded. The archaeological visibility was poor due to the dense grass no sites/materials were observed in the access road or other disturbed areas on the property. In general, the area for the proposed 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. There are no known graves or buildings older than 60 years on the site. The development may proceed as planned.



Figure 1. General views of the proposed site for the construction of the Chaba Battery Storage Facility on Portion 1 and 3 of Farm 162 near Komga.

DISCUSSION AND CONDITIONS

No archaeological sites/materials were observed during the investigation of the proposed site for the construction of the Chaba Battery Storage Facility. 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. Should such material be exposed then work must cease in the immediate area and it must be reported to the Albany Museum (Tel: 046 6222312) or to the Eastern Cape Provincial Heritage Resources Authority (Tel: 043 7450888), 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 developer must finance the costs should additional investigations be required.

LETTER OF RECOMMENDATION

It is recommended that the proposed construction of Battery Storage Facility on Portion 1 and 3 of Farm 162 near Komga within the Great Kei Local Municipality of the Eastern Cape Province is exempted from a full Phase 1 Archaeological Heritage Impact Assessment. The proposed area for development appears to be of low cultural sensitivity and it is therefore unlikely that any significant archaeological heritage remains will be found on the property. 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 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 construction work), it must be reported to the archaeologist at the Albany Museum in Makhanda (Grahamstown) (Tel: 046 6222312) or to the Eastern Cape Provincial Heritage Resources Authority (Tel.: 043 7450888) immediately. The developer must finance the costs should additional studies be required as outlined above. The *onus* is also on the developer 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

Identification of Iron Age archaeological features and material

- Upper and lower grindstones, broken or complete. Upper grindstone/rubber may be pitted.
- Circular hollows - sunken soil, would indicate storage pits and often associated with grindstones.
- Ash heaps, called middens with cultural remains and food waste such as bone.
- Khaki green soils would indicate kraal areas.
- Baked clay/soil blocks with or without pole impression marks indicate hut structures.
- Ceramic potsherds.
- Iron slag and/or blowpipes indicate iron working.
- Human remains may also be associated with khaki green soils.
- Metal objects and ornaments

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 or in ceramic pots. Developers are requested to be on the alert for these features and 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.

Fossil bone

All 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

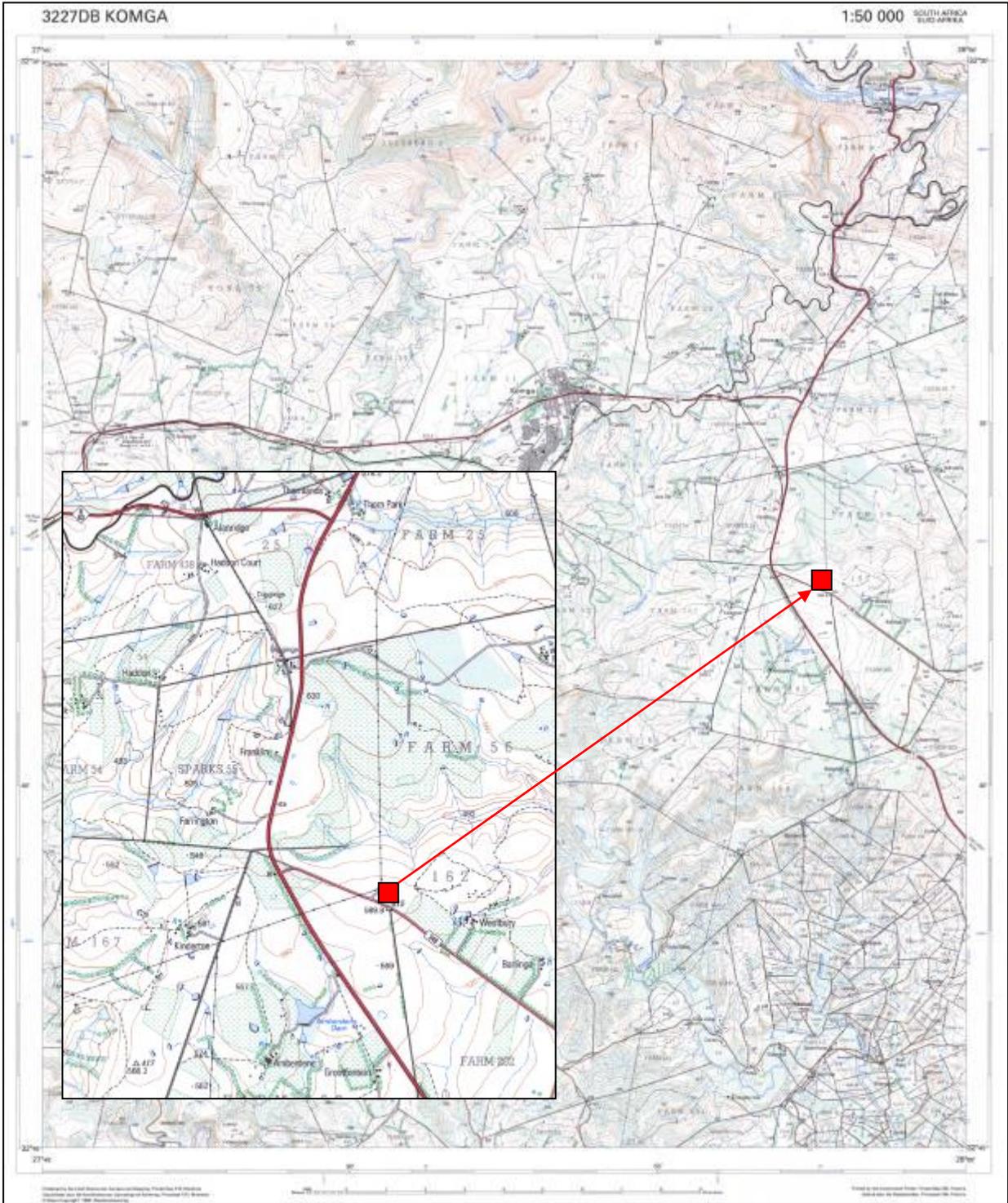
These occur in different forms and sizes, but easily identifiable. The most common are an accumulation of roughly circular fire cracked stones tightly spaced and filled in with charcoal. They are usually 1-2metres in diameter and may represent cooking platforms. Others may resemble circular single row cobble stone markers. These occur in different sizes and may be the remains of wind breaks or cooking shelters.

Large stone cairns

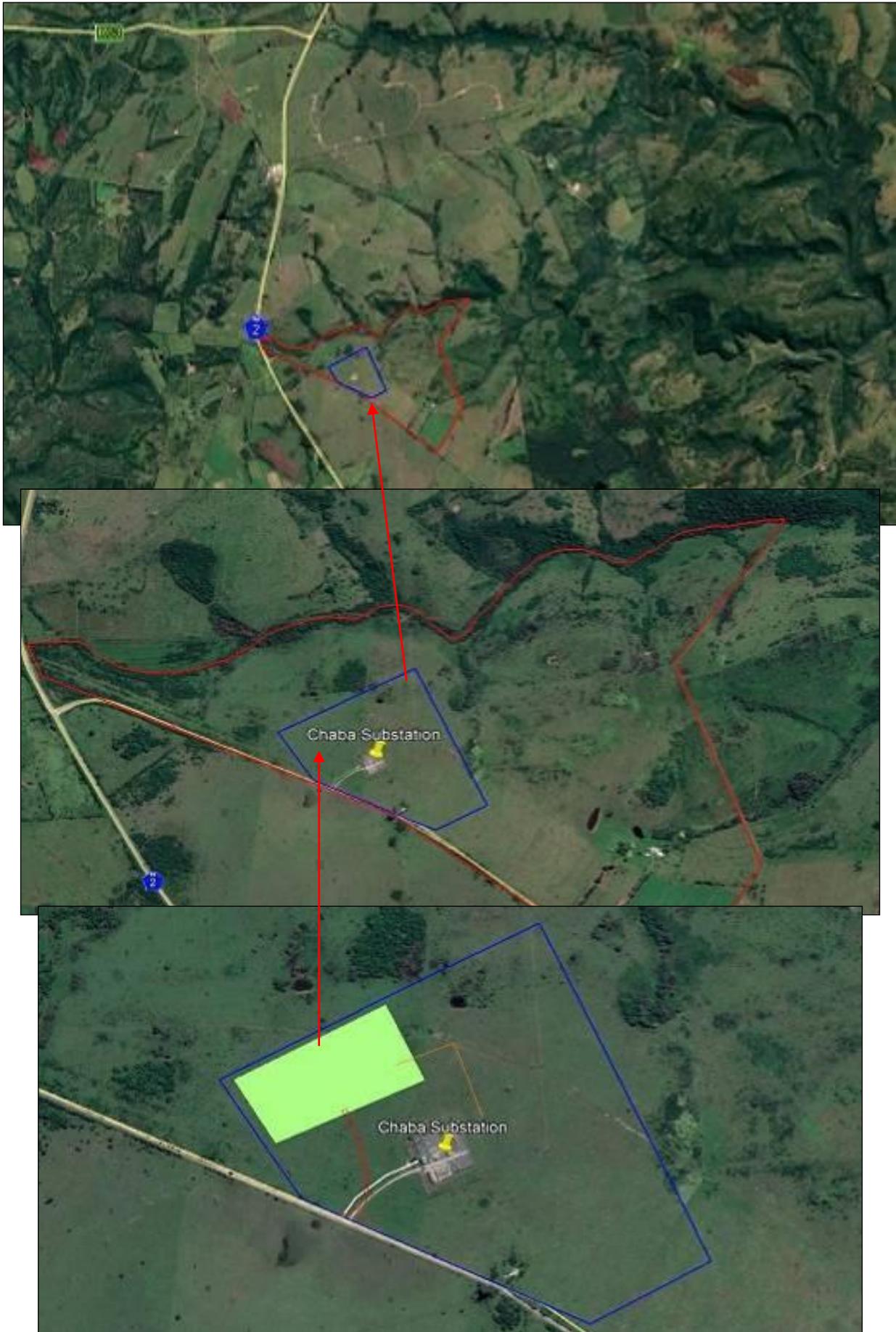
The most common cairns consist of large piles of stones of different sizes and heights are known as *isisivane*. They are usually near river and mountain crossings. Their purpose and meaning are not fully understood, however, some are thought to represent burial cairns while others may have symbolic value.

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 site for the construction of the proposed Chaba Battery Storage Facility on Portion 1 and 3 of Farm 162 near Komga



Map 2. Aerial views of the location and layout of the proposed site for the the construction of the Chaba Battery Storage facility (indicated in green) near Komga. The Chaba substation is indicated by the yellow placemark.