

ASHA Consulting (Pty) Ltd 40 Brassie Street Lakeside 7945

30 October 2018

Nicolaas Hanekom **Eco Impact Legal Consulting (Pty) Ltd** P.O. Box 45070 Claremont 7735

Dear Nicolaas

FINAL LAYOUT OF PROPOSED SOLAR ENERGY FACILITIES ON OLYVEN KOLK FARM 187/6 AND 187/7, NEAR KENHARDT

Thank you for sending the final layouts for the above-mentioned photo-voltaic (PV) facilities and inviting comments related to the heritage impacts and how they differ from the impact assessment process already undertaken on the preliminary layouts. It is noted that larger blocks of PV panels have been designed with Blocks 1 and 2 being on Portion 6 to the south of the road and Blocks 3 to 5 being on Portion 7 to the north of the road (please find mapping on the following pages).

Firstly, it must be noted that the original assessment found no heritage resources within the development area that required *in situ* conservation. Avoidance is always best, but archaeological mitigation of those areas that cannot be avoided is deemed acceptable. To this end, the newly proposed layouts are acceptable from a heritage point of view. A number of the Later Stone Age sites that lie along water courses have been avoided, while the sites that would require mitigation because they fall within the development footprint are all open Early (ESA) and Middle (MSA) Stone Age artefact scatters that are very easy to sample. The significance of the archaeology in this area is connected to the very high density of large cutting tools (LCTs) found on the ESA scatters. Such densities are seldom recorded.

A brief summary of the significant archaeological heritage present in each Block and the nature and extent of mitigation required are listed below. Prior to undertaking the mitigation, a follow up survey that covers those areas not already surveyed will need to be undertaken in order to determine whether any further areas require mitigation. In Blocks 1 to 4 these areas are quite small, while a fairly large area remains unsurveyed in Block 5. It is likely that all these areas can be covered in three days on site. Mitigation of the areas listed below would take 6 days on site altogether for one person (3 days on Portion 6 and 3 days on Portion 7). Any further areas requiring mitigation would need to be added to this.

Block	Waypoint	Description	Mitigation requirements
1	058	Area of dense gravel with many	Sample artefacts over an area of 30-40 m ² .
	S29 27 51.6	background scatter artefacts in it.	This would be via surface collection in a grid
	E20 52 42.8	The vast majority of artefacts are of	of 1 m squares because the substrate is
		a pale quartzite and clearly	rocky (c. 4 hours required).
		originate from the same source.	

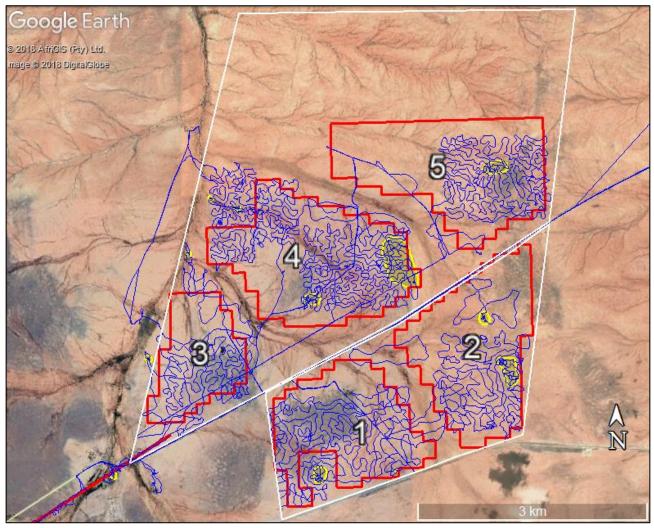
-		_	
2	ESA1 S29 27 10.2 E20 53 36.9	Extensive area with dense background scatter that includes many LCTs.	Sample artefacts over one or more areas as appropriate. This can be done within large grid squares (2x2 m) because of the relatively low density. A detailed survey of the surrounding area should then be undertaken with all LCTs and other diagnostic artefacts collected (GPS points should be taken) (c. 6 hours required).
2	ESA2 S29 26 47.2 E20 53 25.1	ESA artefact scatter with many LCTs. Only identified quickly by the presence of handaxes.	Sample artefacts over one or more areas as appropriate. This can be done within large grid squares (2x2 m) because of the relatively low density. A detailed survey of the surrounding area should then be undertaken with all LCTs and other diagnostic artefacts collected (GPS points should be taken) (c. 6 hours required).
4	ESA4 S29 26 39.5 E20 52 01.5	ESA artefact scatter with many LCTs.	Sample artefacts over one area of about 20 x 20 m. This can be done within large grid squares (2x2 m) because of the relatively low density. A detailed survey of the surrounding area should then be undertaken with all LCTs and other diagnostic artefacts collected (GPS points should be taken) (c. 4 hours required).
4	ESA5 S29 26 24.1 E20 52 43.0	Extensive ESA artefact scatter with many LCTs.	Sample artefacts over one or more areas as appropriate. This can be done within large grid squares (2x2 m) because of the relatively low density. A detailed survey of the surrounding area should then be undertaken with all LCTs and other diagnostic artefacts collected (GPS points should be taken) (c. 12 hours required).
5	ESA3 S29 25 43.8 E20 53 30.4	Extensive ESA artefact scatter with many LCTs.	Sample artefacts over one or more areas as appropriate. This can be done within large grid squares (2x2 m) because of the relatively low density. A detailed survey of the surrounding area should then be undertaken with all LCTs and other diagnostic artefacts collected (GPS points should be taken) (c. 6 hours required).

In sum, there are no different types of heritage that might be impacted by the revised layouts and the archaeological resources that will be impacted can be easily mitigated. The revised layouts are acceptable from a heritage point of view and there are no fatal flaws.

Yours sincerely

Jayson Orton

ASHA Consulting (Pty) Ltd Reg. no.: 2013/220482/07 | Directors: Jayson Orton & Carol Orton 40 Brassie Street, Lakeside, 7945 | T: 021 789 0327 | C: 083 272 3225 Jayson@asha-consulting.co.za | Carol@asha-consulting.co.za | www.asha-consulting.co.za



Aerial view of the wider study area showing Portions 6 and 7 (smaller and larger white polygons respectively), the survey tracks (blue lines) and the five PV blocks proposed for development (numbered red polygons). Sensitive archaeological sites are shown as yellow shapes. The following images show close-up views of each block.

