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**Our Ref:** 9/2/018/0004  
**SAHRIS Ref:** Case ID: 1895  
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South Africa

**RE: ROBBERN ISLAND SEWAGE PACKAGE: DRAFT BASIC ASSESSMENT REPORT REF: 14/12/16/3/3/3/83**

A Draft Basic Assessment Report- **ROBBEN ISLAND SEWAGE PACKAGE: DRAFT BASIC ASSESSMENT REPORT REF: 14/12/16/3/3/3/83** was submitted which relates to the construction of a sewage package plant on Robben Island which will be used to treat sewage from the island to ensure compliance with the National Water Act, no. 36 of 1998. The entire plant will cover a total footprint of 1400m<sup>2</sup> and will include a sewage treatment plant, irrigation tanks, two drying beds and pipelines. SAHRA notes that this development was not mapped on SAHRIS as per the agency's requirement.

In support of the intended development, specialist studies were commissioned by WSP which included a paleontological and an archaeological impact assessment. The archaeologist, Dr Ute Seeman, undertook a site survey of the area proposed for the development and noted that it had already been heavily disturbed by previous surface activities, i.e. the establishment of underground electrical cabling and pipelines and the construction of three sewage pump stations. Evidence of a brick structure and a cement platform are also present on site. The age of these structures is not clearly defined in the report but they certainly date post World War II.

According to the SAHRA palaeosensitivity map the area where the proposed sewage plant is located is of moderate fossil sensitivity and a desktop study was required. Dr Almond in his desktop paleontological impact assessment states that the study area is underlain by a veneer of aeolian sands of the Witsand Formation of Holocene to recent age. Since the proposed sewage package plant is not expected to be deeper than 2.5 meters, no impact is expected on paleontological resources.

(Please refer to the following reports- *Almond, J., January 2014. PALAEOLOGICAL SPECIALIST STUDY: DESKTOP BASIC ASSESSMENT Proposed Sewage Package Plant on Robben Island, Cape Town, Western Cape* and *Seeman, U., April 2013. Archaeological Impact Assessment -*

(AIA) Report on the survey of a site on Robben Island situated south of the Dog Unit (Robert Sobukwe House) between Murray's Bay and Murray's Road)

### **Discussion:**

**In regard to the construction phase, the following objectives are to be pursued-**

- *Maintaining good house-keeping through the duration of the construction phase;*
- *Continual fencing of construction camp to ensure that people and African penguins cannot enter the camp.*
- *Screening of unsightly aspects from public view including excavations (where practical), construction material storage areas, waste storage areas and ablutions).*
- *The rehabilitation of all areas of natural vegetation that have been disturbed as a result of construction activities.*
- *Designation of construction materials and fuel storage areas.*
- *Effective control of waste and containment of storm water.*
- *Implement dust suppression measures (with water or other technique) when appropriate,*
- *As defined by WSP ENVIRONMENTAL CONSULTANTS, in the above draft report.*

**In regard to the above it is recommended that the following form part of the final report:**

- That the spatial references, i.e. GPS co-ordinates, referred to in the report are plotted in the context of site plan and site map. SAHRA is, however, unable to comment on the intended built interventions proposed without proper documentation in the form of technical drawings illustrating the extent of interventions in the report. This technical documentation should be part of the submission.
- The report also does not reference the ***Robben Island: Integrated Conservation Management Plan*** which prescribes conservation principles that need to be taken into account in any intervention that is proposed on the Island.
- As part of the construction phase, SAHRA would recommend that a suitably qualified heritage consultant be part of the construction phase and a ***Construction Management Plan*** as part of the documentation to ensure that no ***Historic Fabric of Significance*** is compromised during construction.

### **Comment:**

SAHRA Built Environment therefore, has no objection to development of a sewage package plant as contained within the content of the **ROBBEN ISLAND SEWAGE PACKAGE: DRAFT BASIC ASSESSMENT REPORT REF: 14/12/16/3/3/3/83** provided that the recommendations as set out in the **DRAFT BASIC ASSESSMENT REPORT REF: 14/12/16/3/3/3/83** assessment by the WSP consultants are duly followed when work is carried out on site. In addition, taking into consideration the archaeological and palaeontological imperatives, SAHRA has no objection to the proposed development provided that, if any any evidence of archaeological sites or remains (e.g., remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, marine shell and charcoal/ash concentrations), unmarked human burials, fossils or other categories of heritage resources are found during the proposed activities, SAHRA APM Unit (Colette Scheermeyer 021 462 4502) must be alerted immediately, and a professional archaeologist or palaeontologist, depending on the nature of the finds, be contacted as soon as possible to inspect the findings.

If the newly discovered heritage resources prove to be of archaeological or paleontological significance a Phase 2 rescue operation might be necessary.

Should you have any queries please do not hesitate to contact the SAHRA Built Environment Unit Manager, Mr. Gregory Ontong at [gontong@sahra.org.za](mailto:gontong@sahra.org.za), Mr. Gcobani Sipoyo, Heritage Officer at [gsipoyo@sahra.org.za](mailto:gsipoyo@sahra.org.za) or Dr. Mariagrazia Galimberti Heritage Officer: Archaeology, Palaeontology and Meteorites Unit at [mgalimberti@sahra.org.za](mailto:mgalimberti@sahra.org.za).

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Gcobani Sipoyo', written in a cursive style.

**Gcobani Sipoyo**  
**HERITAGE OFFICER: BUILT ENVIRONMENT UNIT**