



an agency of the
Department of Arts and Culture

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CaseID: 10018

Date: Wednesday August 30, 2017
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Letter

In terms of Section of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr Jonathan Kaplan
Agency for Cultural Resources Management
5 Stuart Road
Rondebosch
7700

Proposed Refurbishment of Namakwa Bulk Water Supply Pipeline, Concordia Commonage: Bvi Consulting Engineers, on behalf of the Nama Khoi Municipality, are proposing to lay a new water supply pipeline between Rooiwinkel and Nababeep, directly on top of the old copper railway line. The developers have indicated that no physical alteration of the railway line will take place, as the pipes will be laid on pre-cast concrete plinths that will be placed on top of the line.

EnviroAfrica was appointed by the Sedibeng Water Board to conduct a Basic Assessment Process for the proposed refurbishment of the Namakwa Bulk Water Supply Pipeline, Concordia Commonage, Northern Cape Province. A Basic Assessment Report (BAR) was completed in support of the Environmental Authorisation Application in terms of the National Environmental Management Act, 1998 (NEMA) in 2011. The proposed activities will include the installation of two above ground water pipelines from Bulletrap turn-off to Kliphooigte (± 6 km) and one from Okiep to Nababeep (± 11 km). Two options for each pipeline route were considered. As part of the BAR, an Archaeological Scoping Report was completed in 2011 by Jonathan Kaplan.

Kaplan, J. 2011. Archaeological Scoping the Proposed Construction of a New Water Pipeline between Rooiwinkel and Nababeep, Northern Cape.

It was noted that the proposed pipeline would be constructed directly on top of the existing historical railway between Okiep and Nababeep. The railway was constructed from 1969 and discontinued in the 1940's and the railway line removed in the 1950's. The railway was assessed on foot and four stone bridge crossings were identified. The locomotive used on the railway line "Clara" is located at the Nababeep Museum.

Recommendations provided in the report include the following:

- Extreme care must be taken to protect the integrity of the historical railway line and bridge crossings;
- A detailed recording (photographic and technical) of all bridge crossings must be made by a suitably qualified heritage practitioner;



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- A more detailed account of the history of the railway line between Okiep and Nababeep must be done;
- Bvi Consulting Engineers have indicated their willingness to help rebuild Bridge Crossing 1, in consultation with a specialist heritage consultant;
- No ruins, structures or features older than 60 years may be destroyed, altered, or renovated without a permit issued by Heritage Northern Cape;
- A copy of this report must be submitted to the South African Heritage Resources Agency in Cape Town, and Northern Cape Heritage.

It is unclear whether the completed Archaeological Scoping Report was submitted to SAHRA for comments.

The BAR notes that no heritage resources were identified along the two alternatives for the Bulletrap Turn-off to Kliphoogte Line, with the exception of a shepherds hut located 75 m from Alternative 1. No heritage resources were identified along the two alternatives for the Okiep to Nababeep line, with the exception of the railway line.

A letter from the Department of Environment and Nature Conservation dated 16 February 2012 was issued, granting the proposed replacement of the pipeline, an Amended Environmental Authorisation.

Following this, a second Heritage Report was completed in May 2016 by Dr Lita Webley regarding the historical railway line.

Webley, L. 2016. Historical Observations on the Copper Railway Line between Rooiwinkel and Nababeep, Northern Cape.

It was noted that the railway line is defined as an archaeological resources, as it is a structure older than 100 years and in disuse, and therefore requires a permit in terms of Section 35 of the National Heritage Resources Act, 1999 (Act 25 of 1999). The railway line forms part of the previously UNESCO Proposed World Heritage Site (WHS), the Namaqualand Copper Mining Landscape (NCML). The application was lodged in 2009 and was on the Tentative List until it was removed in 2015. It is suggested that the NCML be graded as a Grade II Provincial Heritage Site/Area or Grade IIIa of Local Importance. The Okiep Mining Area is currently a proposed Grade II Provincial Heritage site, though it is not clear whether the proposed development will impact the site.

In an Interim Comment issued on 13/09/2016, SAHRA required clarification regarding the project. A response from Jonathan Kaplan dated 24 July 2017.

- The proposed water pipeline will be built on small pre-cast concrete plinths directly above the railway

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line, so that in effect the pipeline will `float' above the remains of the railway line, with no physical alteration or damage to the line;

- A report on the historical significance of the old copper railway line between Rooiwinkel and NababEEP was a recommendation that was made in the 2011 report;
- Dr Lita Webley of the Archaeology Contracts Office (ACO) was commissioned to undertake a more detailed account of the historical importance of the railway line;
- Please note that no new or amended Environmental Authorisation is being sought; and
- We are merely notifying SAHRA of compliance with the previous recommendations of the 2011 Scoping Report, which requested more detail on the historic railway line.

Comment

SAHRA thanks the applicant for the clarification. It is unclear if the original application for the construction of the pipeline was submitted to SAHRA for comment in terms of NEMA in 2011. SAHRA notes that the development was authorised in 2012 by the Department of Environment and Nature Conservation, and that the recommendations provided in the 2011 Heritage report were included as part of the EA.

Clarification is sought as to whether the pipeline has been constructed or not, and the detailed recording of all bridges and crossings as required in the 2011 Heritage report must be submitted to SAHRA.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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John Gribble
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and
Meteorites Unit
South African Heritage Resources Agency

ADMIN:
Direct URL to case: <http://www.sahra.org.za/node/368473>
(DENC, Ref: NNO 25/19)