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Department of Arts and Culture

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CaseID: 11362

Date: Thursday October 12, 2017

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## Interim Comment

### In terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999)

Attention: AECOM SA - Head Office

P O Box 3173  
Pretoria  
0001

## Helios Power Line

Nsovo Environmental Consulting was appointed by Transnet Freight Rail (TFR) to conduct a Basic Assessment Process for the proposed upgrade of the Eskom Helios Substation and the construction of 15km 50kv powerline from Aries to the proposed new Transnet Helios Traction Feeder, Hantam Local Municipality, Northern Cape Province. A Basic Assessment Report was submitted in support of an Environmental Authorisation Application in terms of the National Environmental Management Act, 1998 (NEMA), NEMA 2010 EIA Regulations. The proposed development was authorised by the Department of Environmental Affairs on 2 April 2015 (Ref: 14/12/16/3/3/1/1247).

It is noted that the Archaeological Impact Assessment (AIA) submitted for the case is referenced in SAHRIS Case ID 6859, the original application as part of the BAR process (<http://sahra.org.za/sahris/cases/proposed-construction-transnet-helios-tfs-and-15km-50kv-power-line>). No comments were issued by SAHRA on this case.

The AIA conducted as part of the BAR was completed by Vhubo Archaeo-Heritage Consultants.

*Magoma, M. 2014. Phase 1 Archaeological Impact Assessment Report for the Proposed Construction of Transnet 5 KM 50kv Power Line from Eskom Aries Substation to the Proposed New Transnet Aries Traction Feeder Substation within the jurisdiction of Kai! Garib Local Municipality of ZF Mgcawu District, Northern Cape Province.*

A total of seven (7) Middle Stone Age artefacts occurrences of medium and medium to high significance, one structure older than 60 years of medium significance, and one possible grave site of high significance were identified within the powerline route. It must be noted that no photograph was provided for the possible grave.

Recommendations provided include that the area proposed for a powerline is subjected to a heritage



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walk-down study once all the final pylon placements have been made. The walk down will focus on the individual pylon positions to see if any pylons will negatively impact on any archaeological sites. It should also concentrate on servitude and access roads that will be used during the construction.

An Archaeological Walk-down Survey was conducted in fulfillment of the Environmental Management Programme (EMPr).

*Van der Walt, J. 2017. Archaeological Walk-down Survey for the Proposed Helios 50kv Power Line near Loeriesfontein, Hantam Local Municipality of the Namakwa District, Northern Cape.*

Numerous stone artefacts were identified along the power line route. A single vernacular building recorded as the Sous Farmstead was identified 122 m from the proposed powerline and will not be directly impacted on. A chance finds procedure was recommended.

The 2015 Construction EMPr has the following mitigation measures with regards to heritage resources:

- No stone robbing or removal of any material is allowed;
- All identified archaeological material shall be barricaded and marked as no go for the duration of the construction phase;
- If any archaeological material (e.g. fossils, bones, artefacts etc.) is found during excavation, the contractor shall stop work immediately and inform the Construction Manager;
- The Contractor shall not recommence working in that area until written permission has been received from the SAHRA;
- Under no circumstances may any heritage material be destroyed or removed from site;
- Where burial sites are accidentally disturbed during construction, the affected area should be demarcated as no go zone by use of proper barricading and access thereto must be denied.
- Tower 25-28: Located on a flat section of land, several Early and Middle Stone tools were documented. An application for a destruction permit to have the site destroyed is recommended. This should also be subject to detail mapping and documentation;
- Tower 29-32: An application for a destruction permit to have the site destroyed is recommended. This should also be subject to detail mapping and documentation.

In an Interim Comment issued on 17/08/2017, SAHRA requested clarity on the heritage resources at the towers as noted above in the CEMPr. There is no correlation between the heritage reports written and the recommended mitigation measures at towers 25-32 in the CEMPr. Please provide descriptions of the heritage resources including statement of significance, photographs and impact assessments. Additionally, a desktop



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Palaeontological Impact Assessment must be conducted for the project as the development is located within an area of moderate sensitivity.

*Rossouw, L. 2017. Palaeontological Desktop Assessment of the proposed new 9km-long section of the Aries power line near Brandvlei, Northern Cape Province.*

The authorised development footprint is underlain by early-mid Permian shales and mudrocks of the Ecca Group, Whitehill and Tierberg formations of low to moderate palaeontological sensitivity. These sediments are capped by superficial deposits of moderate to high palaeontological sensitivity. As such landscape features such as water course, depression margins and pan dune deposits are palaeontological sensitive.

Recommendations provided in the report include that it is advised that a Phase 1 Palaeontological Impact Assessment must be conducted for structure locations marked HEL/8TRA 2 to HEL/8TRA 16 before the start of any excavation so that potential palaeontological remains can be identified, recorded and removed.

*Van der Walt, 2017. Letter ref: SAHRIS Case ID 11362. Helios Heritage Walk through.*

The letter provided by the consultant noted that the recommendations for mitigation for towers referred to above, were the result of findings of the Magoma 2014 report. It is of the opinion of Mr. Van der Walt that some the artefacts photographed in figure 6 and 7 are not artefacts, and that the significance attributed to these findings should be low.

Additionally, the consultant has recommended that the recommended mitigation measures provided at towers 25-32 be excluded from the CEMPr as the "artefacts" were incorrectly identified and therefore given an inaccurate significance rating, and subsequent mitigation measures.

In an Interim Comment issued on the 06/10/2017, SAHRA requested that the grave referred to in the Magoma report must be ground-truthed as it appears to be 20 m from the powerline route. A report detailing the results of the ground-truthing must be submitted to SAHRA prior to construction.

A letter providing more information regarding the grave has been submitted to the case.

*Van der Walt, J. October 2017. SAHRIS Case ID 11362. Helios Heritage Walk through*

The grave referred to in the Magoma report is noted as a possible grave, and no photograph was supplied in the report. No such site was identified as part of the walk-down at the location provided in the Magoma report.

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The possible grave location is  $\pm 30$  m from an intermediate strain structure that requires a foundation of 3.6 m in diameter, and is located 18 m outside of the powerline servitude.

Recommendations provided include:

- The possible grave must be demarcated during the construction phase. The ECO must monitor the area to ensure that the possible grave is not impacted by the proposed construction activities.

### Interim Comment

The SAHRA Burial Grounds and Graves (BGG) Unit accepts the latest submitted letter regarding the possible grave and the recommendations contained therein.

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit awaits the PIA as requested for in the previously issued comments on the 06/10/2017. Further comments will be issued upon receipt of the PIA.

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

Yours faithfully

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Acting Manager: Archaeology, Palaeontology and Meteorites Unit

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**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/405809>