

Our Ref:



an agency of the  
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: [info@sahra.org.za](mailto:info@sahra.org.za)  
South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
P.O. Box 4637 | Cape Town | 8001  
[www.sahra.org.za](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 11363

Date: Monday February 19, 2018  
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## Interim Comment

**In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: Mr David Tunnicliff  
Eskom Holdings SOC Ltd

**Proposed 400kV transmission power line, stretching between the Mahikeng area (North West Province) in South Africa and Gaborone in Botswana. The line will connect the existing Isang substation in Botswana to the proposed Watershed B substation in South Africa.**

Aurecon South Africa (Pty) has been appointed by the Southern African Power Pool (SAPP) to conduct an Environmental Impact Assessment (EIA) process for the proposed Botswana-South Africa (BOSA) Transmission Interconnection Project, North West Province. A draft Scoping Report has been submitted in terms of the National Environmental Management Act, Act No 107 of 1998 (NEMA) and the NEMA EIA 2014 Regulations. It must be noted that this project crosses the border of South Africa to Botswana. The comments issued by SAHRA apply only to the section of the project within the borders of South Africa.

The proposed development will include the construction of approximately 560 km 400kV transmission line connecting the Isang 400kV substation in Botswana to a proposed new Watershed B 400/132 kV substation in the North West Province, South Africa and further connecting the proposed Watershed B substation to the Mookoodi and Pluto 400kV substations in the North West Province, South Africa. A total of five (5) alternative routes are being considered. Option C is the preferred route. Three routes are being considered for the Watershed B-Isang Route, Option 2 is the preferred option. Three alternative locations are being considered for Watershed B Substation, Option C is the least preferred option.

G & A Heritage: Heritage Management Consultants were appointed to conduct the Heritage Pre-Scoping Report.

*Gaigher, S. 2016. Heritage Pre-Scoping Report for the First Phase of Investigation into the Heritage Sensitivity of the proposed BOSA Power Line Alignment.*

Several types of heritage resources have been identified to be located within and around the proposed powerline routes. These include Palaeo-Anthropological sites, Stone Age and Iron Age sites, Rock Art sites, battlefields, cemeteries, historic farmlands, historic rural towns, historic institutions, and scenic routes.

Recommendations provided include that the final alignment of the Watershed B to BOSA connecting lines be



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subjected to a Heritage Walk-down to ensure that it will not impact on historic battle sites associated with the Siege of Mafikeng. It is also recommended that a Heritage Impact Assessment (HIA) be conducted that will include desktop data collection, field surveys, oral interviews and public consultation.

In an Interim Comment issued on 10/08/2017, SAHRA stated that an HIA must be conducted for the section of the proposed development located in South Africa. The HIA must assess all heritage resources as defined in section 3(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) and the HIA must comply with section 38(3) of the NHRA. The Visual Impact of the proposed development on heritage resources and any comments provided by the public regarding heritage resources must be taken into account during the HIA. The HIA must be submitted to SAHRA during the Public Review period as per the NEMA EIA 2014 Regulations.

*Gaigher, S. 2017. Phase 1 Heritage Impact Assessment Report for the Proposed Botswana South Africa (BOSA) Transmission Project.*

It is noted that the entire transmission line was not surveyed and service delivery protests made it difficult to access the development area.

The proposed line is located in areas of very high to low palaeontological sensitivity. It must be noted that Fig. 29 and 30 do not show the proposed line over the palaeontological sensitivity map.

Heritage resources such as Middle Stone Age (MSA) and Later Stone Age (LSA) artefacts were identified along the proposed route. Possible high risk areas for Stone Age sites were noted in Fig. 41 of the HIA. Surface scatters of Iron Age potsherds were identified along the proposed route. The area is known to consist of Early Iron Age sites, as well as Later Iron Age sites (LIA). Through Lidar and aerial photographs, no such sites could be identified within the proposed corridor. Smaller Early Iron Age sites may be evident within the proposed route, as the Lidar or aerial photographs would not provide clear images of these smaller sites. Possible sensitive areas for Iron Age sites are noted in Fig. 45.

Several heritage resources were identified from historical maps, such as cemeteries, graves and ruins. All sites identified from the historical maps are located well outside the development footprint. Several villages and farmsteads were identified within the proposed route. As is the practice, burials can occur within the confines of these settlements. The documentation of these burial grounds will form part of the social impact assessment.

The impact assessment showed that the impacts to the palaeontological resources, Stone Age sites, Iron Age sites, Built Environment and burial sites will be medium negative pre-mitigation and low negative post

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mitigation.

Recommendations provided in the report include the following:

- The final pylon placements should be subjected to a walk-down survey to verify that no sites will be affected;
- It is recommended that the development designs consider the positive and negative characteristics of the existing cultural landscape type and that they endeavor to promote the positive aspects while at the same time mitigating the negative aspects;
- A Chance Finds Procedure is recommended.

The Appendix 9: Heritage Management Plan (HMP) of the Environmental Management Programme (EMPr), and the recommendations contained therein are noted.

### Interim Comment

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A desktop palaeontological must be conducted by a qualified palaeontologist for the proposed project. The desktop study must comply with the 2012 Minimum Standards: Palaeontological Component for Heritage Impact Assessments.

A map/s showing the areas surveyed in relation to the proposed powerline must be submitted. SAHRA does not accept the statement in 2.5 of the HIA. Additionally, the Lidar data and aerial photographs used to survey the line must be provided. Photographs of the Iron Age pottery must be supplied

Further comments will be issued upon receipt of the above.

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  
South African Heritage Resources Agency

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**ADMIN:**  
Direct URL to case: <http://www.sahra.org.za/node/405813>  
(DEA, Ref: )