

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 11967

Date: Friday December 15, 2017
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Letter

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

Attention: Ms Andrea van Gensen
Eskom Holdings SOC Ltd
Eskom Centre
120 Henry Street
P.O.Box 356
Bloemfontein

Proposed upgrading of the 66kv network to 132kv network in the Hotazel, Kuruman And Kathu area, including the construction of new substation and switching station and upgrading of existing substations, Northern Cape Province

Zitholele Consulting was appointed by Eskom to conduct an Environmental Authorisation (EA) Application for the upgrading of the 66kV network to 132kV network in the Hotazel, Kuruman and Kathu Area, Northern Cape Province. A Basic Assessment Report (BAR) was followed in 2015 as per the National Environmental Management Act, 1998 (NEMA), and NEMA 2014 Environmental Impact Assessment (EIA) Regulations. The development included the construction of the following:

- Construction of a 132kV Eldoret, Riries, Moffat and Valley substation next to existing 66kV substations;
- Expansion of the existing Hotazel Substation;
- Construction of a new Gamohaam substation between Riries substation and existing Mothibistad switching station;
- Construction of a 132kV Mothibistad substation next to existing Mothibistad switching station
- Construction of 132kV power line between Hotazel Substation and Valley Substation
- Construction of a new 132kV power line between the Valley Substation to the newly authorised Sekgame Switching Station, just south of Kathu
- Decommission the existing 66kV network between Hotazel and Valley Substations. This will include decommissioning of the Existing 66kV infrastructure at the Hotazel substation; the existing 66kV Eldoret, Riries, Asbes, Moffat and Valley substations; the existing Mothibistad switching station; the existing 66kV wooden pole power lines between Hotazel and Valley substations.

PGS Heritage (Pty) Ltd was appointed to provide Heritage input into the BAR.

Fourie, W. 2015. Heritage Impact Assessment: The proposed upgrade of the 66kv network in the Kuruman



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area, Northern Cape Province.

The HIA identified 15 heritage resources (two cemeteries, nine historic farmsteads, two historic mines, a sacred/religious site, a Provincial Monument and a memorial).

Recommendations provided in the report include the following:

- Adjust the development layout and demarcate cemetery sites with at least a 20-meter buffer. In the case of K12 this buffer must be made at least 100 meters to keep the development away from the memorial. In the event that the sites cannot be excluded from the development footprint a grave relocation process as described in Section 5 of this reports needs to be implemented;
- Adjust Corridors and position of pylons to avoid historical structures;
- Mitigation in the form of a watching brief and monitoring at the above sites during construction if any construction is to take place closer than 100 meters from the site;
- All historic structure will require a destruction permit under Section 34 of the NHRA. The permit will entail initial documentation of the layout and condition of the structures and its structures with layout sketches and detailed photography, after which the destruction permit can be applied for with the backing of the documentary evidence. A qualified heritage practitioner must do this documentation;
- Select Rir-Gamo Alt 1 to avoid impacting on the sacred/religious sites vista. If the Rir-Gamo Alt 2 is considered and selected a consultation process with local spiritual and religious groupings will be required to consult on the possible impacts and consequences of construction activities on the site and intangible heritage;
- Choose Gamo-Mothi Alt 2 as better option to avoid the Provincial Heritage Site. Adjust Corridors and position of pylons to avoid the site;
- Mitigation in the form of a watching brief and monitoring at these sites during construction if any construction is to take place closer than 200 meters from the site;
- A buffer of at least 500 meters must be kept from the monument. This distance can however be negotiated with the Provincial Heritage Authority–Heritage Northern Cape;
- These historic mines and associated structures are protected under Section 34 of the NHRA, will need to be avoided and preserved. Due to the sensitive nature of asbestos and its history of negative health effects, heritage mitigation efforts will be prohibitively expensive, and avoidances of these areas are recommended;
- It is recommended that a full Paleontological Impact Assessment (PIA) be initiated during the pre-construction phase when the heritage walk down of the final alignment will be done.

The development application and HIA was not submitted to SAHRA during the EA Application process, and



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therefore SAHRA could not have provided comments as per section 38(4) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

The Department of Environmental Affairs (DEA) granted the EA on the 06/11/2015 (DEA Ref: 14/12/16/3/3/1/1376). Conditions 24, 25 and 26 of the EA are noted with regards to the requested walk-down of the final powerline routes, the bufferzones to be established around the graves, and the chance finds procedure.

Two walk down reports have been submitted to SAHRA, compiled by PGS Heritage (Pty) Ltd.

Fourie, W. 2016. Heritage Walkdown and Management Plan: The proposed upgrade of the 66kV network in the Kuruman area – Hotazel to Mthibistat Substations, Northern Cape Province.

A total of eight heritage resources were identified on the Hotazel-Mothibistat route (seven cemeteries and one historical feature) and one heritage resource (one cemetery) within the Moffat-Valley route. Recommendations provided in the report include demarcating the heritage sites as no go areas with a 20 m buffer, and the sites must be monitored during the construction phase.

Angel, J. 2016. Heritage Walkdown and Management Plan: Upgrading of the 66kV Network to a 132kV Network in the Hotazel, Kuruman and Kathu Area, Northern Cape Province–Post Authorisation Walkdown from Mothibistad Substation to Sekgame Switching Station.

A total of four heritage resources were identified including two cemeteries, one historical structure and one Stone Age site.

Recommendations provided in the report include the following:

- Demarcate the heritage sites as no go areas with a 20 m buffer;
- It is recommended that the Environmental Control Officer (ECO) be present during construction at the cemetery sites;
- If the graves will be disturbed in any way and a buffer is not possible, a grave relocation process will need to take place;
- The historical structure must be monitored during construction;
- The historical structure must be recorded before destruction if the building is to be destroyed or disturbed.

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The Hotazel to Mothibistad 132kV powerline site walk down and site specific EMPr and the recommendations contained therein regarding heritage is noted. The EMPR for the proposed upgrading of the 66kV network to 132kV network in the Hotazel, Kuruman and Kathu area, Northern Cape Province and the recommendations pertaining to heritage contained therein, are noted.

Comment

As the NEMA EA Application process was completed in 2015, SAHRA cannot provide comments in terms of section 38(8) or section 38(4) of the NHRA. However, the recommendations of the specialists, and the recommendations within the two EMPr's are endorsed, with the following additional conditions that should be adhered to:

- A no-go buffer zone of 30 m should be demarcated around the identified heritage sites, with monitoring procedures in place. Monitoring reports must be submitted to SAHRA upon completion of the construction phase;
- With regards to Site K12, the occupied/in use historical structures, and the Provincial Heritage Site, the Northern Cape Provincial Heritage Resources Authority must be contacted to provide comments/decision on these sites;
- A Palaeontological Walk down must be completed by a qualified palaeontologist prior to the construction of the powerlines and associated infrastructure. No construction should commence without comments from SAHRA;
- If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA.

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

Phillip Hine
Acting Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:
Direct URL to case: <http://www.sahra.org.za/node/449493>
(DEA, Ref: 14/12/16/3/3/1/1376)