

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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Enquiries: Natasha Higgitt
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CaseID: 15782

Date: Friday May 21, 2021
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Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Triplo4 Sustainable Solutions

The proposed development entails construction of a 55m high, telecommunication mast and associated infrastructure on the Remainder of Farm Elandsheuwel No. 146, Hanover, in the Umsobomvu Municipality, in Northern Cape Province. A 3m wide, approximately 125m long gravel access road will also be constructed from the existing gravel road to gain access to the proposed site. The total development footprint is approximately 100m². The mast's base station will be enclosed with a steel palisade fence. Electricity to power the mast will be sourced from an existing Eskom line. A new overhead line of approximately 420m will need to be constructed from the Eskom line to the site.

Enviro Africa CC has been appointed by Atlas Tower (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed telecommunication tower on the Remainder of Farm Elandsheuwel No. 146, Hanover, in the Umsobomvu Municipality, in Northern Cape Province.

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include a 55 m telecommunication mast with related infrastructure covering a footprint of 100 m², a new 3 m gravel road, and a new overhead powerline (420 m long).

Natura Viva CC and ACRM have been appointed to provide heritage specialist input as part of the EIA process as required by section 24(4)b(iii) of NEMA and section 38(3) and 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Almond, J. E. 2020. Palaeontological Assessment: Recommended Exemption from further Palaeontological Studies. Proposed construction of a communications mast on the Remainder of Farm Elandsheuwel No. 146 near Hanover, Umsobomvu Municipality, Northern Cape Province

The development is underlain by Karoo Dolerite that does not contain fossils, with Late Permian sediments of the Balfour formation which are largely overlain by doleritic colluvium, and Pleistocene or younger gravels, calcretes and soils of low palaeontological sensitivity. Due to the small impact footprint of the proposed

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development, the anticipated impact will be very low. A Chance Fossil Finds Procedure is recommended to be followed and is provided in the report.

Kaplan, J. 2020. Archaeological Heritage: Letter of Exemption from further specialist studies & mitigation. Proposed construction of a 25m high Telecommunication Mast on Rem of the Farm Elandsheuwel 146 near Hanover, Northern Cape Province.

A few Stone Age lithics and a stone-walled kraal was identified in close proximity to the proposed development. The kraal was noted to be of low significance. No further recommendations were provided.

In an Interim Comment issued on the 11/12/2020, SAHRA requested that a Heritage Impact Assessment inclusive of a field-assessment of the location of the proposed road and powerline. The HIA must include an assessment of the already identified heritage resources as noted above, as the submitted report does not satisfy the requirements of section 38(3) of the NHRA.

Since the issuing of the Interim Comment, a HIA has been submitted inclusive of a revised BAR (20/04/2021).

Kaplan, 2021. Heritage Impact Assessment: Proposed Construction of a 55m high Telecommunication Mast on Re Farm Elandsheuwel No. 146 Hanover, Umsobomvu Municipality, Northern Cape Province.

A total of 2 heritage resources were identified (Stone Age lithic scatter) and a small stone kraal, with isolated artefacts along the ridgeline. It is noted that the tracklogs provided in the HIA are the same as the previous report, therefore the powerline and road routes were not surveyed. It is further noted in the report that the specialists scanned the landscape from the kopje, noting that no potential locations for archaeological sites were seen in the grasslands.

Recommendations provided in the report included that the Environmental Control Officer must be briefed in the event of any archaeological resources being uncovered or disturbed during construction activities.

Since the issuing of the Interim Comment, the specialist has reiterated via email that the road to be upgraded is an existing road and the proposed powerline route will be bush cut and no surface sands will be removed.

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The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and

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section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR report and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – Further additional specific conditions are provided for the development as follows:
 - A 15 m no-go buffer must be adhered to around the stone kraal/walling;
 - The ECO must be trained to identify heritage resources and must conduct monitoring of the construction of the road and powerline. A monitoring report must be submitted upon completion of the construction phase;
- 38(4)c(i) – 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 as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – 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 as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. 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;
- The Final BAR Report and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/545707>
(, Ref:)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.