

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
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 17006

Date: Thursday October 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: Umoyilanga (Pty) Ltd

Eskom requires that Umoyilanga (Pty) Ltd, a preferred bidder selected as part of the DMRE Risk Mitigation Independent Power Producer Procurement Programme (RMIPPPP), upgrade a portion of the existing 132 kV Gordonia-Garona transmission line as part of the works required for connecting the new Avondale Hybrid Solar project to the grid. This draft Basic Assessment Report (BAR) pertains to the application for environmental authorisation to upgrade this portion of the 132 kV Gordonia-Garona transmission line. This portion of the transmission line is therefore referred to as the 132 kV Gordonia-Avondale transmission line as the line stretches from Gordonia to the new Avondale Hybrid Solar project

Zutari (Pty) Ltd has been appointed by Umoyilanga (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed upgrade of the Gordonia-Avondale 132KV transmission line, Upington, Northern Cape Province.

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the replacement of existing pylons with monopole structures with a smaller footprint, temporary laydown and site camps.

In a Final Comment on the 20/09/2021 (<https://sahris.sahra.org.za/node/582612>), SAHRA noted no objections to the proposed development and provided conditions for the development. Since the issuing of the Final Comment, the initially proposed development alternatives were found to be unfeasible and were discarded. New alternatives for the project include the upgrade of the transmission line by constructing new monopole structures along the existing centreline (existing lattice structures to be removed). The location of the proposed line has not changed.

As the previously assessed development footprint is still to be used, and only the method of construction has changed, the heritage assessments were not updated.

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

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. No further additional specific conditions are provided for the development;
- 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 of the NHRA for offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;
- 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 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

**Proposed upgrade of the Gordonia-Avondale 132KV transmission line,
Upington, Northern Cape**

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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/580752>

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.