

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 19283

Date: Tuesday September 06, 2022  
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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: Robben Island Museum

Robben Island Museum

**This is a repeat application for an Environmental Authorisation that has expired (Ref: 14/12/16/3/3/3/83). There is currently no formal Wastewater Treatment Works (WWTW) on Robben Island. All sewage is pumped by six pump stations to a collection sump near Robert Sobukwe's former residence, where it is macerated and pumped along the outfall sewer pipeline to discharge through a diffuser 465 m offshore. The proponent, Robben Island Museum (RIM), therefore proposes to construct a WWTW with a daily throughput capacity of 300m<sup>3</sup> per day on the eastern side of Robben Island in Table Bay. Treated effluent will gravitate to the existing sewage collector sump at the proposed WWTW site from where it will be pumped along the existing outfall sewer pipeline to discharge through a diffuser 465 m offshore. The project site is bounded to the northeast by Murray's Bay beach (80 m), to the north by the Dog Unit (Robert Sobukwe Complex) (30 m), to the west by Murray's Road (50 m) and to the south by the Robben Island village (400 m) (Figure 1-1). A Basic Assessment (BA) was previously undertaken by WSP in 2014/15. An Environmental Authorisation (EA) was secured for the proposed WWTW on 27 March 2015 and an extension was granted on 27 March 2018 (Ref: 14/12/16/3/3/3/83). The WWTW authorised in the EA was for a treatment capacity of 108,000 m<sup>3</sup> per annum with all the effluent generated on the Island discharged via a marine outfall into the coastal environment after treatment. The design allowed for a maximum discharge volume of 300m<sup>3</sup> per day. The EA states "this activity must commence within a period of five (5) years from the date of EA issued on 27 March 2015 (i.e. the EA lapses on 27 March 2020). If the commencement of the activities does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the activity to be undertaken." Due to unforeseen circumstances, the project did not commence by the expiry date of 27 March 2020 and the EA subsequently lapsed. RIM is therefore required to apply for a new EA.**

WSP Group Africa Proprietary Limited has been appointed by Robben Island Museum to conduct an Environmental Authorisation (EA) Application for the proposed Waste Water Treatment Works on the eastern site of Robben Island National and World Heritage Site, Table Bay, Western Cape.

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental



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Management Act, 1998 (NEMA) and the EIA Regulations. A previous EA application was undertaken in 2014/2015 and the EA was granted on the 27 March 2015 (Ref: 14/12/16/3/3/83), and an extension granted on 27 March 2018, however the EA has now lapsed.

The proposed activities include the construction of several tanks with excavations to depths of between 3 and 5 m, the excavated material will be used to create a berm along the western perimeter of the development envelope to resemble a natural dune, trenches for pipes, a laydown area, temporary site camp, temporary fencing and permanent penguin proof fences within a buildable area of 1 070m<sup>2</sup>.

As part of the original EA application, a Palaeontological and Archaeological Assessment were undertaken. The specialists have provided letters with regards to the validity of these previous assessments.

*Almond, J. E. 2014 and 2021. Palaeontological Specialist Study: Desktop Basic Assessment. Proposed Sewage Package Plant on Robben Island, Cape Town, Western Cape.*

The proposed development area is underlain by the Tygerberg Formation and the Witsand Formation. There are unconfirmed reports of simple invertebrate burrows within the Tygerberg Formation sandstones that are potentially of great scientific interest, though would only occur in the intertidal zone and are unlikely to be impacted by the development. A range of invertebrate, vertebrate and plant subfossils, and microfossils have been identified within the Witsand Formation dune sands, however these are widely distributed. Given the shallow excavations and small footprint of the proposed development, significant impacts on buried or subsurface fossils are not anticipated. A Chance Fossil Finds Procedure is recommended.

The specialist has confirmed that the results and recommendations of the 2014 report remain valid.

*Du Plessis, L. 2022. Desktop Visual Impact Assessment Screening for the Proposed Treatment Works, Robben Island, Western Cape Waste Water, South Africa.*

The potential for visual disturbance is relatively low, given the size of the development and vertical height of the WWTW, however, as Robben Island is an open air museum, any further development will affect the historical integrity of the island. The extent of the visual exposure on the sensitive receptors i.e. Robert Sobukwe House and main tourist road will be high.

Mitigation measures recommended include:



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- Retain / re-establish and maintain large indigenous trees, natural features and noteworthy natural vegetation in all areas outside of the activity footprint;
- Retain / re-establish and maintain natural vegetation in all areas outside of the development footprint;
- Plan ancillary infrastructure in such a way and in such a location that clearing of vegetation is minimised. Consolidate existing infrastructure as much as possible, and make use of already disturbed areas rather than pristine sites wherever possible;
- Keeping infrastructure at design heights;
- Introducing landscaped screening measures such as vegetated earth mounds;
- Wherever possible, use materials, coatings, or paints that have little or no reflectivity and blends with the natural environment;
- Commercial messages, symbols and/logos are not permitted on structures (with the exception of 'no-entry' signage on perimeter fencing).

The SAHRA Built Environment Unit (BEU) and Archaeology, Palaeontology and Meteorites (APM) Unit conducted a site visit of the proposed development area in October 2021. It was noted that the development area was previously impacted and that the adjacent buildings would not be directly impacted.

It must be noted that a bunker (possible WW2) was identified by SAHRA staff under a tree between the proposed development area and the Leper Church, approximately 38 m from the road adjacent the development footprint. The bunker was constructed with a mix of red brick and stone, and sand bags with corrugated iron roof sheeting with two rooms. The bunker was filled with rubble and soil. It was noted that the bunker would not be directly impacted by the proposed development.

### Final Comment

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 and Built Environment Unit (BEU) has no objections to the proposed development;
- 38(4)b – The recommendations of the Palaeontological, Archaeological and Visual specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
- A buffer zone of 5 m must be maintained around the Robert Sobukwe House and 30 m around the



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possible WW2 bunker. No parking of vehicles, placing of construction material or other activity may occur within these bufferzones in order to ensure no direct impacts. These buffer zones must be clearly marked using danger tape. No workers may be allowed to enter the bunker;

- Due to the proximity of the bunker, an archaeologist must monitor the ground clearance and excavation phase. The monitoring must include inspections of the bunker after any intense drilling to ensure the structure is still intact. A monitoring report must be submitted to SAHRA upon completion of the construction phase;
- A permit in terms of section 27(18) of the NHRA must be applied for from SAHRA for the entire development. The permit application must be submitted prior to 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/Ngqabutho Madida 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 regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - 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

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/602969>  
(DFFE, Ref: 14/12/16/3/3/3/404)

**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.