

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
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Natasha Higgitt
Tel: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20941

Date: Monday May 08, 2023
Page No: 1

Final Comment

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

Attention: Impumelelo Wind (Pty) Ltd

Impumelelo Wind (Pty) Ltd (the Applicant) is proposing the development Impumelelo Wind Energy Facility (WEF) located approximately 19 km North-East of the Town of Greylingstad in the Mpumalanga Province. The proposed project entails the construction of 1 x up to 132kV OHPL from the Alternative 1 substation (preferred Impumelelo WEF onsite substation) to the to connect to the Eskom Zandfontein Substation.

WSP Group Africa (Pty) Ltd has been appointed by Impumelelo Wind (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed 132kV Overhead Powerline and Substation near Secunda, Mpumalanga 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 construction of overhead powerline (either double or single circuit and two alternative routes are being considered) between Alternative 1 Substation and the Eskom Zandfontein Substation of approximately 33 km in length and 40 m high, span lengths of 250 m, concrete foundations for the pylons, substation and access roads and associated infrastructure.

Prof Marion Bamford and ASHA Consulting (Pty) Ltd have been appointed to provide heritage specialist input into the EA process in terms of section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Bamford, M. 2023. Palaeontological Impact Assessment for the proposed Grid Connection for the Impumelelo WEF, near Secunda, Mpumalanga Province

No site visit was conducted by the palaeontologist. The proposed north eastern section of the development area is underlain by potentially fossiliferous Vryheid Formation, while the remaining sections are underlain by non-fossiliferous dolerite. It was noted by the archaeologist that the area is highly disturbed, covered in dense vegetation and the route of the powerline is adjacent to existing roads. A Chance Finds Procedure is recommended to be implemented.

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Orton, J. 2023. Heritage Impact Assessment: Proposed Impumelelo Grid Connection Near Secunda, Mpumalanga

A total of five heritage resources were identified within the proposed powerline route. These include stone features of low heritage significance, an Iron Age stone walled settlement and a historic farmstead of medium heritage significance, a burial ground and possible burials of high heritage significance.

Recommendations provided in the report include the following:

- If Alternative 1 is used then no pylons may be placed within 30 m of the IM001 graveyard falling within the corridor;
- The powerlines may span over the IM001 graveyard buffer but should preferably not pass over the site itself;
- If Alternative 2 is used then the substation footprint must be reconfigured to avoid the IM011 Iron Age settlement and its 50 m buffer;
- The potential grave at IM004 should be avoided;
- Alternative 2 powerline route is preferred;
- A pre-construction survey needs to be undertaken on all unploughed sections of the final layout;
- No stones may be removed from any archaeological site; and
- If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

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 EMP:

- 38(4)a – The SAHRA has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development;
- A pre-construction palaeontological survey of the finalised route must be conducted for areas underlain

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by the Vryheid Formation. A report detailing the results of the survey must be submitted to SAHRA for comment. No construction may commence without comments from SAHRA in this regard;

- The recommended archaeological and palaeontological preconstruction surveys must be conducted by qualified archaeologist and palaeontologist and must be conducted prior to any ground clearance. The reports of the surveys must be submitted to SAHRA for comment prior to any ground clearance. No ground clearance of construction may occur on site without comments from SAHRA;
- SAHRA reserves the right to stipulate additional conditions, layout changes or object to the development based on the results of the preconstruction surveys;
- As the height of the proposed pylons will be 40 m, the buffer around the identified burial ground IM001 must be 40 m. The powerline and associated infrastructure must be redesigned to avoid the graves and the stipulated 40 m bufferzone. No powerlines may span over the identified burial ground;
- 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 (Natasha Higgitt 021 202 8660) 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:
- 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

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above in the case header.

Yours faithfully

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahrissahra.org.za/node/615438>
(DARDLEA, 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.