

Interim Comment

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

Attention: Royal Haskoning DHV

Fountain Square
78 Kalkoen Street
Monument Park Ext. 2
Pretoria

Draft Environmental Scoping Report for the Proposed Continuous Ash Disposal Facility for the Matimba Power Station in Lephalale, Limpopo Province

Van Schakwyk, J. April 2014. Heritage Impact Assessment for the Proposed Continuous Ash Disposal Facility for the Matimba Power Station, Lephalale, Limpopo Province

Eskom proposes the establishment of a continuous ash disposal facility at the Matimba Power Station, Limpopo Province. According to the Final Draft Scoping Report (DSR), an ash disposal facility requires the following type of infrastructure:

- Conveyor system for ash transportation
- Drainage system
- Site office
- Workshop
- Contractors' yard
- Water supply pipelines, for ash/dust suppression
- Ash water return dams
- Storm water control dams (these will be constructed as per the GN 704 of the National Water Act (No. 36 of 1998))
- Storm water control berms
- Access roads to, on and around the facility. These roads include temporary roads during construction and permanent roads during the operation.

Ash disposal site – The design of this site will be dependent on aspects such as the results of the ash classification study, topography, etc.

It is noted that the precise details of what infrastructure will be required has not yet been decided as this is dependent on the location of the site. A Phase 1 Archaeological Impact Assessment was undertaken in support of this application. This report was compiled by Dr Johnny van Schalkwyk. Dr van Schalkwyk investigated the two alternatives for the disposal site (Alternative 1 and Alternative 2), and a conveyor route for Alternative 2. Alternative 1 is an extension of the existing ash disposal facility whereas Alternative 2 is a green fields development.

In terms of the heritage report, the survey of the area took place over three days, between 2012 and 2014. Alternative 1 for the ash disposal facility was surveyed on 15 August 2012, Alternative 2 was surveyed on 19 July 2013, and the conveyor route for Alternative 2 was surveyed in 2014.



an agency of the
Department of Arts and Culture

The author notes that the topography of the area is very flat with few features, such as hills and rivers etc, that would have attracted people to the area. Alternative 1 is located on the farm Zwartwater 507 LQ, Alternative 2 is located on the farms Vooruit 449 LQ, Ganzepan 446 LQ, Appelvlakte 448LQ and Droogeheuvel 447 LQ. The conveyor route for Alternative 2 will traverse the farms Appelvlakte 448 LQ, Nelsonkop 464 LQ and Grootestryd 465 LQ. The specialist indicated that the area has been the subject of several research papers as well as Cultural Resources Management (CRM) projects. However, information about the results of this work is not presented in the report.

Alternative 1:

No archaeological resources were identified within the footprint of the area to be developed. A two roomed structure which is in a poor state of preservation. The author noted that this structure is of local significance and indicated that no further mitigation would be required.

Alternative 2:

No archaeological resources were identified within the footprint of the area to be developed. The remains of a small house structure were identified, the site is poorly preserved, and only the house foundations remain. The author noted that the site is of low significance. However, local informants indicated to the specialist that graves are associated with the site. The graves could not be located during the survey. The author noted that the area should be considered sensitive and the workers of Exxaro should mark the graves if found. It is noted that the site falls outside the area to be developed.

Conveyor Route/Alternative 2:

No archaeological or any other heritage resources were identified during the field assessment.

Figure 14 in the Environmental Scoping Report dated April 2013 (a year earlier than the Phase 1 AIA) is the heritage sensitivity map for the development area and shows one historical mine shaft, one cemetery located close to the existing ash disposal facility, one house and one (supposedly) isolated grave. There is also the mention of an outcrop site to the Iron Age and the Stone Age site of Nelson's Kop. None of these sites is mentioned in the archaeological impact assessment. Information regarding these heritage sites is only included in the Scoping Report at page 67. Moreover, Figure 32 of the Scoping Report mentions seven heritage sites instead of the five included in Figure 14. It is unclear what site 3 and site 6 on Figure 32 of the scoping report represent.

From previous research it is known that Nelson's Kop is an important Later Stone Age site. However, no mention of the impact of the proposed conveyor belt on the site is found in the heritage impact assessment. This is unfortunate since, according to Figure 4 of the Heritage Impact Assessment, Nelson's Kop is located about 1 km away from the proposed conveyor belt and it is unclear whether the construction or operational Phase of the conveyor belt may affect the site.



The South African Heritage Resources Agency

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No palaeontological assessment was undertaken for this project. According to the SAHRA fossil sensitivity map, Alternative 2 and the conveyor route is situated in an area that has a high to very high fossil sensitivity. A field based palaeontological assessment would be required before authorisation is granted for this alternative. Alternative 1 is located in an area of moderate sensitivity; a desktop assessment is required and dependent on the results of this, a field assessment may be necessary.

Comment:

SAHRA has reviewed the Final Scoping Report and Heritage Assessment and recommends the following:

1. SAHRA requests that the heritage impact assessment is revised in the light of the heritage sites highlighted in Figure 14 and 32 of the Scoping Report. The impact that the proposed Alternative 1, 2 and the conveyor belt will have on these sites must be clearly explained in the assessment.
2. A palaeontological desktop assessment be undertaken for Alternative 1. If the palaeontologists deems it suitable, a letter of exemption may be submitted to the heritage authority suggesting that no further palaeontological studies are necessary.
3. A palaeontological impact assessment be undertaken for Alternative 2 and the related conveyor belt.
4. If Alternative 2 is preferred for the ash disposal facility, a palaeontological field assessment will be required and must be submitted to SAHRA for commenting before authorisation is granted. The field assessment must include the proposed conveyor route alignment.

SAHRA will further comment on this project once the information required are submitted to the agency.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully



Phillip Hine
Heritage Officer





Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/118558>

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.

