

Our Ref:

Enquiries: Phillip Hine
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CaseID: 2233

Date: Wednesday November 13, 2013

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Final Comment

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

Attention: Ms Grace Motsoane
Eskom Holdings SOC Ltd
Megawatt House
Simba Road
Sunninghill
Johannesburg

Subsequent to the EIA report compiled by Savannah Environmental (Pty) Ltd in July 2008 an Environmental Authorisation (EA) was issued by the Department of Environmental Affairs. The EA specified a number of specific conditions that need to be adhered to in the construction and operation of the Steelpoort Integration Project, Limpopo Province. This Construction Environmental Management Programme (CEMP) document is based on the findings of the Draft Construction and Operation Environmental Management Plan submitted as part of the Final EIA report (Savannah, 2008), and has been amended by ILISO Consulting (Pty) Ltd based on the findings of walkthroughs that were conducted by heritage as well as fauna, flora and wetlands specialists in November and December 2012. The construction and refurbishment of transmission power lines can have a significant impact on the environment. It is thus imperative that better precautions be taken to ensure that environmental damage is prevented, minimised or mitigated. This will take a concerted effort from the Contractor and proper planning is of the utmost importance.

Van Schalkwyk, J. 2012. Compilation of construction environmental management programmes for the Steelpoort to Marble Hall 400Kv power line and the Steelpoort integration project: heritage resources assessment.

Eskom proposes the construction of the 400Kv transmission power line known as the Steelpoort-Marble Intergration project. SAHRA provided comments on the initial Heritage scoping Report for this project dated 29 January 2008. SAHRA requested a walk through of the final proposed alignment. In addition, a palaeontological study was requested or at least a letter of exemption from further palaeontological studies must be submitted to SAHRA.

The Heritage report submitted to SAHRA presents the results of the walkdown of the final route alignment and Tower Positions. It should be noted that a number of heritage resources have been identified, most notably cemeteries and sites of archaeological interest. The following sites were identified:

Burials

- No L/Site 1: A formal community cemetery with at least 200 graves. According to report the power line will bypass the site, but that the site should be cordoned off with danger tape.
- L/Site 02: Three small graves, probably of three children which is still fenced. The report recommends that



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the site should be cordoned off with danger tape and a buffer zone of 10 meters established.

- L/Site03: A number of well-marked graves inside the yard of a house. The report indicated that it is unlikely that this site will be impacted by the power line.
- L/Site04: A single marked grave next to some sisal plants. The report indicates that the site falls within the power line corridor and that it should be cordoned off with danger tape.
- L/Site05: A single marked grave under a tree which falls inside the power line corridor. The report recommends the site be cordoned off with danger tape and a 10 meter buffer zone maintained.
- L/Site06: A single marked grave adjacent to a house. The report indicates that the site is probably outside the power line corridor but may be close to a proposed access road. It was recommended that the site be demarcated with danger tape and a 10 meter buffer zone established.
- L/Site07: A large community cemetery, developed in two different sections. The report indicates that the power line will bypass the cemetery, although the specialist recommended that the site should be demarcated with danger tape.
- T/Site 09: A number of well-marked graves, fenced off with wire. The site falls within the power line reserve. It is recommended that the site be fenced with danger tape and a 10 meter buffer zone established.
- T/Site 10: A single marked grave next to a homestead. This site also falls within the power line corridor and the author suggested that the site should be fenced with danger tape and a 10 meter buffer zone established.
- T/Site 11: A single marked grave fenced off with a metal fence. The site is considered to be situated within the power line corridor and it was suggested it be fenced and a 10 meter buffer zone established.
- L/Site 09: A small cemetery with graves dating to the recent past. This site also falls within the power line corridor and it is suggested that the site be fenced and a 10 meter buffer zone maintained.
- No. T/Site 08 is a formal community cemetery with probably more than 100 graves. The report indicates that the power line will bypass the cemetery and should not have any impact on it.
- No. T/Site 07 is an informal burial place with an unknown number of graves marked only with stone cairns, located under a large tree. The report indicates that the site is located close to the power line reserve and Tower T111. The report recommends that the site should be demarcated with danger tape for the duration of the construction period.
- T/Site04: An informal burial place with three graves, two of which are marked with headstones. The report suggests that the site is located close to the power line reserve and should be fenced with danger tape for the duration of the construction period.
- T/Site05: A single grave with a headstone, but with no inscription. The author recommends the same for this site as for the others that it should be fenced with danger tape for the duration of the construction period.
- T/Site01 and T/Site02: Both graves are situated between Tower locations T15 and T16 and are located inside the power line reserve. It was recommended that the sites be marked with danger tape.

Archaeological Sites



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- No. L/Site 08: The site represents a heap of stones commonly referred to as an isivivane. It is located close to tower L64. The author recommended that the site be fenced with danger tape and 10 meter buffer zone maintained.
- No. L/Site 10: This site represents stone walling occurring all along the foot of the two hills. It probably dates to the recent past and formed part of homesteads, cattle enclosures and agricultural fields. It is noted that the report states that the site is located near the power line reserve. The archaeologist recommended that the site should be fenced with danger tape and a 10 meter buffer zone implemented.
- No. T/Site 12-14: This site comprise a large settlement site with an approximate extent of 500 x 400 meters. The settlement also comprise agricultural terracing. It is noted that the power line will traverse the site and that a substation is proposed on the settlement site. The archaeologist indicated that the substation site cannot be moved and that the archaeologist will have to be mitigated.
- T/Site 15: Stone walling which probably formed part of a homestead with a cattle kraal. It is estimate to be approximately 80 x 50 metres in size. According to the report the site is situtaed underneath the power line and close to tower T188. The archaeologist recommended that then extent of the site should be fully mapped and that an archaeologist be present during construction activities.
- T/Site 16: Ephemeral stone walling with no distinctive layout. Due to the difficulty in determining the stone walling, its size could not be determined. The site will not be impacted by the proposed development.
- T/Site 17: Strategic located stone walled site on ridge overlooking Steelpoort River, consisting of a large cattle kraal and smaller stone circles on the periphery. It is estimated to be 150 by 80 metres in size. The site is close to the towers T186 and L92. The archaeologist recommended that the if the tower cannot by moved, an archaeologist should do monitoring during site construction.
- No. T/Site 06: A stone walled site that are used for the initiation of young boys. The various elements such as the central fire place, accommodation structures, etc. are clearly identifiable and also indicates that the site has been used in the recent past. The archaeologist indicated that Tower T 84 will be located on the site and the power line will also traverse it. The archaeologist recommended that the community should be consulted and formal consent be given for the power line to pass over it.
- No. T/Site 03: This site represents the remains of an old labourer homestead. According to the the report the site falls within the power line reserve and close to Tower T32. The author recommended that the site should be fenced with danger tape and a 50 meter buffer zone should be maintained around the outer perimeter of the site.



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Decision

- According to the the heritage report submitted none of the burial grounds identified during the heritage assessment should be impacted by the proposed power line. The archaeologist recommended that the sites should all be fenced with danger tape during construction activities and a 10 meter buffer zone observed around them. However, SAHRA recommends that the buffer zone should be at least 15-20 meters.
- A number of archaeological sites have been identified during the walkdown survey. According to the report, the following sites will be impacted by the power line. Site No. T/Site 12-14. The author notes that the complex of sites will be directly impacted by the power line and substation site. It is also noted that according to the report the substation site can't be moved. No reason was given why the substation site can't be moved. However, if this is the case then the complex of sites should be fully mitigated. The archaeologist will require a Phase 2 mitigation permit before the work may be undertaken. The Phase 2 mitigation assessment should be comprehensive, the sites should be fully mapped, representative samples where necessary should be excavated and a detailed photographic record kept and submitted to SAHRA. Further recommends may be made upon receipt of the Phase 2 report.
- Site T/17 is located close to towers T186 and L92. The author's recommendation that the towers be moved is supported. If this is not feasible or possible site monitoring must be undertaken by a qualified archaeologist. If any impact is envisaged that a Phase 2 mitigation assessment must be undertaken. The same requirements apply as stated above for Sites No. T 12-14.
- The archaeologist indicated that the Tower 84 will have a direct impact on the initiation site No. T/Site 06. The author recommends that the community should be consulted to allow the power line to traverse the initiation site. Please note that any decisions regarding the initiation site must be sought from the Provincial Heritage Authority.
- Since no palaeontological study was undertaken and one was requested in SAHRA's initial review comment it is requested that such a study be undertaken and submitted to SAHRA for review and comments, prior to any development taking place.
- SAHRA supports the general recommendations of the author as it pertains to monitoring of sites situated within the power line reserve.
- If any previously unknown archeological or other heritage resources are identified during construction activities SAHRA APM Unit (Mrs Colette Scheermeyer/Mr Phillip Hine) or an archaeologist/palaeontolgist must be alerted immediately depending on the resource must be alerted immediately. If the newly discovered resource is considered significant a rescue operation may be required at the cost of the developer.



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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/118849>
(DEA, Ref: 12/12/20/866)

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.



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