

**LETTER OF RECOMMENDATION FOR THE EXEMPTION OF
A FULL PHASE 1 HERITAGE IMPACT ASSESSMENT FOR
THE PROPOSED ALLIANCE FUEL DEPOT, ERF 2561,
LOUIS TRICHARDT, EXT. 5, LIMPOPO PROVINCE.**

Prepared for: TEKPLAN ENVIRONMENTAL



Prepared by: G&A Heritage Management Properties (Pty) Ltd



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LETTER OF RECOMMENDATION FOR THE EXEMPTION OF A FULL PHASE 1 HERITAGE IMPACT ASSESSMENT FOR THE PROPOSED ALLIANCE FUEL DEPOT. ERF 2561, LOUIS TRICHARDT, LIMPOPO PROVINCE.

This heritage evaluation and statement was conducted as a requirement of the National Heritage Resources Act 1999, Section 38 (1)(c)(i): 38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorized as;

- any development or other activity which will change the character of the site
- Construction of a road, wall, power line, pipeline, canal or other linear form of development or barrier exceeding 300m in length.

This report follows the minimum standard guidelines required by the South African Heritage Resources Agency (SAHRA) and the Limpopo Provincial Heritage Resources Agency (LiHRA) for compiling a Letter of Recommendation for the exemption of a Full Phase 1 Heritage Impact Assessment (HIA).

EXECUTIVE SUMMARY

The type of development:

1. Mr Walter Gilfillan (AGRIFUELS Pty Ltd, Reg. no. 2016/002396/07) is of the intention to increase the fuel storage capacity of their existing bulk fuel depot at Makhado, Limpopo.
2. The existing bulk fuel depot is known as "Alliance Fuel" and is located on Erf 2561 Louis Trichardt Extension 5 (Bronn street).
3. The coordinates of the application property are as follows: S23 04 02,8 E29 54 09,6. See enclosed Locality map.

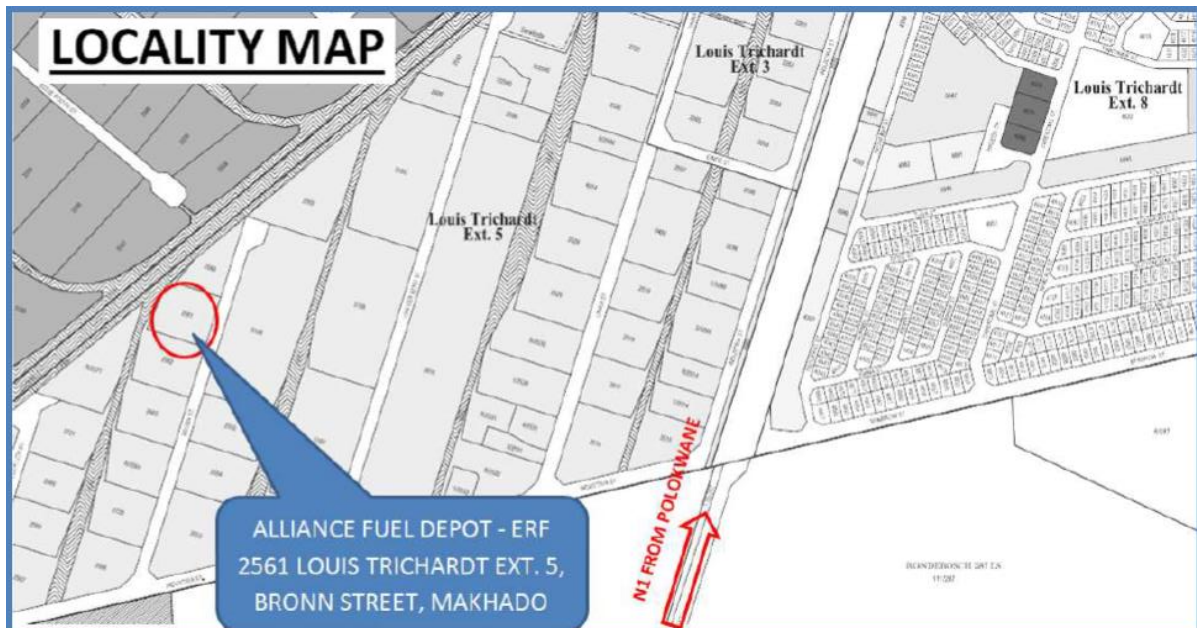


Figure 1. Locality Map

4. The mentioned bulk fuel depot currently has a total storage capacity of 69 000 litres. It is the intention of the Project Applicant (Mr Walter Gilfillan) to increase the total storage capacity with an additional 530 000 litres comprising 5 x 83 000 litre tanks (diesel), 1 x 23 000 litre tank (diesel) & 2 x 46 000 litre tanks (petrol).

5. Nature of application: In terms of the 2014 Environmental Regulations (as amended), application has to be made as soon as you upgrade an existing facility by more than 80 cubic metres. If the upgrade

results in a storage capacity of more than 500 cubic metres, then application has to be made for environmental authorization in terms of the so-called SCOPING & EIA process. The specific listed activity for which authorisation will be sought is ACTIVITY 4 in Listing Notice 2 as published on 7 APRIL 2017 in Government Gazette No. 40772.

ACTIVITY 4 reads as follows: THE DEVELOPMENT AND RELATED OPERATION OF FACILITIES OR INFRASTRUCTURE, FOR THE STORAGE, OR STORAGE AND HANDLING OF A DANGEROUS GOOD, WHERE SUCH STORAGE OCCURS IN CONTAINERS WITH A COMBINED CAPACITY OF MORE THAN 500 CUBIC METRES.

Developer

AGRIFUELS Pty Ltd, Reg. no. 2016/002396/07

Consultant

Tekplan Environmental Consultants

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Terms of reference

Provision of a Heritage Statement Report and Exemption letter.

Summary of Findings

The erf only measures 8147m² and only a small section of this is to be altered during the placement of the fuel tanks. The site has been severely altered in the recent past due to the fact that it falls within the industrial zone of Louis Trichardt. There are several modern industrial buildings on site dating from the last ten years and large parts of the site has been covered in concrete and paving. If any heritage sites were located here, they have been destroyed comprehensively in the recent past.

DESCRIPTION OF THE PROPERTY

Location

Erf 2561, Louis Trichardt, Extension 5, Limpopo Province.



Figure 2. Current condition of site



Figure 3. Modern Industrial Buildings on Site



Figure 4, Current Fuel Storage Tanks

Map

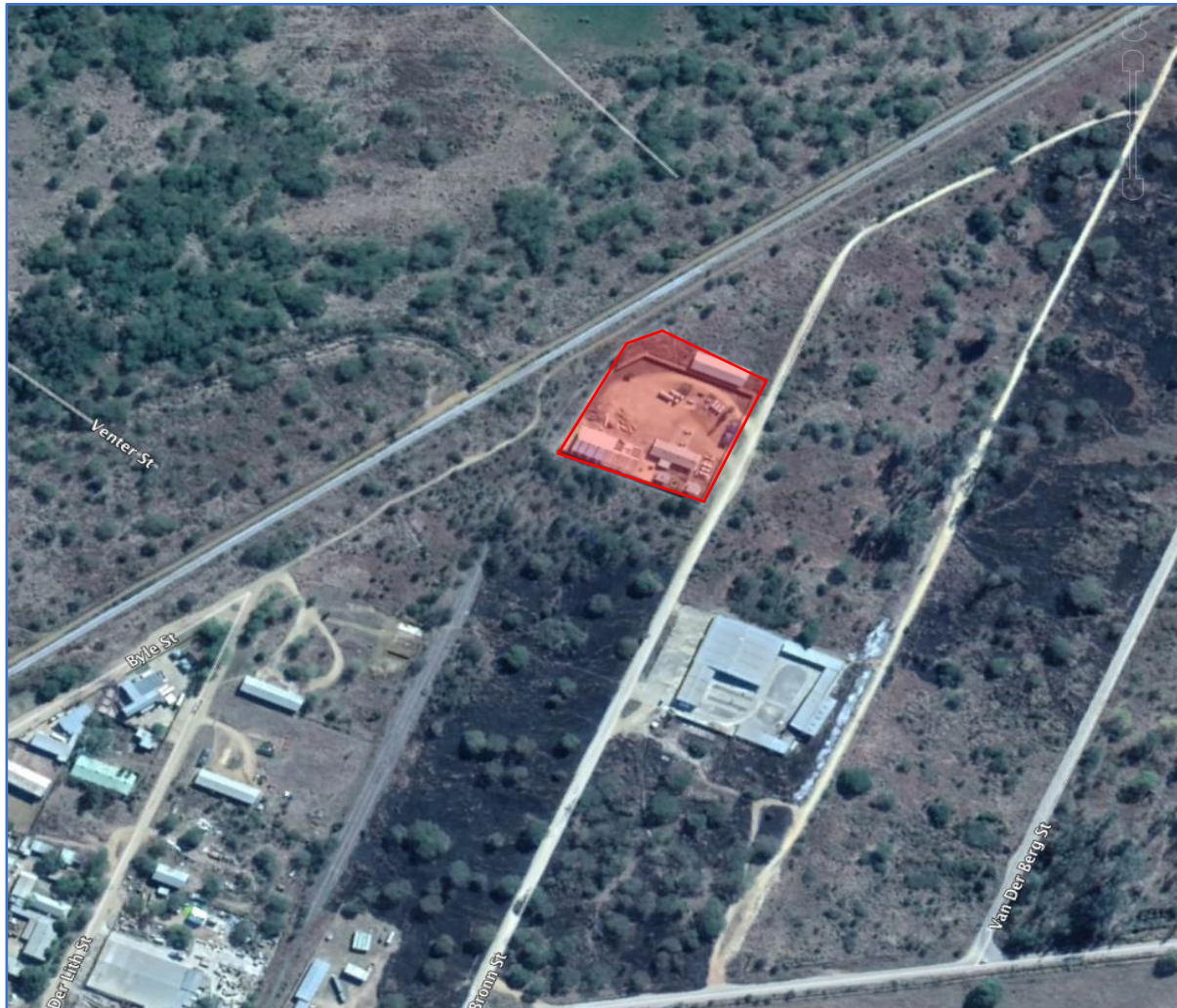


Figure 5. Upgrade location

ARCHAEOLOGICAL INVESTIGATION

Methodology

Fieldwork for this study was performed during 10 April 2018. The whole site was found to be accessible by foot.. The survey was tracked using GPS and a track file in GPX format is available on request.

The study was mainly focused on systematic field surveys of the study area.

Areas with less development impact was investigated closer to determine whether any sites of heritage value could still occur sub-surface, however no indications of such sites were evident (such as graves, shell middens, disposed pot sherd etc).

The study area was surveyed using standard archaeological surveying methods. The area was surveyed using directional parameters supplied by the GPS and surveyed on foot. This technique has proven to result in the maximum coverage of an area. This action is defined as;

'an archaeologist being present during the carrying-out of the development works (which may include conservation works), to identify and protect archaeological deposits, features or objects which may be uncovered or otherwise affected by the works' (DAHGI 1999a, 28).

Standard archaeological documentation formats were employed in the description of sites. Using standard site documentation forms as comparable medium, it enabled the surveyors to evaluate the

relative importance of sites found. Furthermore, GPS (Global Positioning System) readings of all finds and sites were taken. This information was then plotted using a **Garmin Colorado** GPS (WGS 84-datum).

Indicators such as surface finds, plant growth anomalies, local information and topography were used in identifying sites of possible archaeological importance. Test probes were done at intervals to determine sub-surface occurrence of archaeological material. The importance of sites was assessed by comparisons with published information as well as comparative collections.

Results of the Survey

The study area comprises a highly altered industrial plot within Louis Trichardt. All surface features have been removed by years of subsequent construction. Some sheds and the current fuel supply infrastructure occur on site. None of these are of any heritage significance.



Figure 6. Louis Trichardt in the 1920;s



Figure 7. Louis Trichardt in the 1920's



Figure 8. 1920's Louis Trichardt

RELEVANT ARCHAEOLOGICAL IMPACT ASSESSMENTS

- Gaigher, S. AIA for the Proposed Tabor to Louis Trichardt Power Line. 2012
- VD Walt, J. HIA for the Proposed Tilapia Farm Project, Albasini Dam, Elim, Louis Trichardt. 2018
- Van Schalkwyk, J. Mampakuil Base Station HIA. 1999
- Roodt, F. HIA for the Proposed Open Cast Makhado Mine. 2012
- Murimbika, M. HIA for the Construction of 2633km at Tshivhangani Village. 2012
- Murimbika, M. Cultural and Archaeological Heritage Assessment Specialist Study for the Proposed Borrow Pit Site for Road D3761-Mashau to Valdezia Upgrading Project in Makhado Local Municipality, Limpopo Province.

LETTER OF RECOMMENDATION

It is recommended that the proposed Alliance Bulk Fuel Depot Project is exempted from a full Phase 1 Heritage Impact Assessment. The proposed area for development is low in cultural sensitivity. It is unlikely that any archaeological heritage remains will be found on the property. The development may proceed as planned.

There is always a possibility that human remains, or other archaeological and historical material may be uncovered during the development. Such material must be reported to the Limpopo Province Provincial Heritage Resources Agency (LiHRA).

This letter of recommendation only requests exemption of the proposed development from a full Heritage Impact Assessment, but not for other components. The final decision rests with the heritage resources authority, which will supply the applicant with a record of decisions in regards this project.

The National Heritage Resources Act (Act No. 25 of 1999, section 35) requires a full Heritage Impact Assessment (HIA) in order that all heritage resources, that is, all places or objects of aesthetics, architectural, historic, scientific, social, spiritual linguistic or technological value or significance are protected. Any assessment should make provision for the protection of all these heritage components, including archaeology, shipwrecks, battlefields, graves, and structures older than 60 years, living heritage, historical settlements, landscapes, geological sites, palaeontological sites and objects.

SIGNED;



.....

STEPHAN GAIGHER
CEO
G&A HERITAGE MANAGEMENT PROPERTIES (PTY) LTD
10 April 2018

GENERAL REMARKS

It must be emphasised that the results of this survey are based on limited field observations and previous experience. These results can therefore be incorrect when analysed closer. Sites and material may be covered by soil and vegetation and will only be located once this has been uncovered.

Although unlikely, sub-surface remains of heritage sites could still be encountered during the construction activities associated with the project. Such sites would offer no surface indication of their presence due to the high state of alterations in some areas as well as heavy plant cover in other areas. The following indicators of unmarked sub-surface sites could be encountered:

- Ash deposits (unnaturally grey appearance of soil compared to the surrounding substrate);
- Bone concentrations, either animal or human;
- Ceramic fragments such as pottery shards either historic or pre-contact;
- Stone concentrations of any formal nature.

The following recommendations are given should any sub-surface remains of heritage sites be identified as indicated above:

- All operators of excavation equipment should be made aware of the possibility of the occurrence of sub-surface heritage features and the following procedures should they be encountered.
- All construction in the immediate vicinity (50m radius of the site) should cease.
- The heritage practitioner should be informed as soon as possible.
- In the event of obvious human remains the South African Police Services (SAPS) should be notified.
- Mitigation measures (such as refilling etc.) should not be attempted.
- The area in a 50m radius of the find should be cordoned off with hazard tape.
- Public access should be limited.
- The area should be placed under guard.
- No media statements should be released until the heritage practitioner has had sufficient time to analyze the finds.

APPENDIX A: HERITAGE LEGISLATIVE REQUIREMENTS

Parts of sections 34(1), 35(4), 36(3) and 38(1) (8) of the National Heritage Resources Act 25 of 1999 apply:

Structures

34. (1) No person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority.

Archaeology, palaeontology and meteorites

35 (4) No person may, without a permit issued by the responsible heritage resources authority—

- (a) destroy, damage, excavate, alter, deface or otherwise disturb any archaeological or palaeontological site or any meteorite;
- (b) destroy, damage, excavate, remove from its original position, collect or own any archaeological or palaeontological material or object or any meteorite;
- (d) bring onto or use at an archaeological or palaeontological site any excavation equipment or any equipment which assist in the detection or recovery of metals or archaeological and palaeontological material or objects or use such equipment for the recovery of meteorites.

Burial grounds and graves

36. (3) (a) No person may, without a permit issued by SAHRA or a provincial heritage resources authority—

- (a) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves;
- (b) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or
- (c) bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.

Heritage resources management

38. (1) Subject to the provisions of subsections (7), (8) and (9), any person who intends to undertake a development categorized as –

- (a) the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300m in length;
- (b) the construction of a bridge or similar structure exceeding 50m in length;
- (c) any development or other activity which will change the character of the site –
 - (i) exceeding 5000 m² in extent, or
 - (ii) involving three or more erven or subdivisions thereof; or
 - (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years; or
 - (iv) the costs of which will exceed a sum set in terms of regulations by SAHRA, or a provincial resources authority;
- (d) the re-zoning of a site exceeding 10 000 m² in extent; or
- (e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority, must as the very earliest stages of initiating such a development, notify the responsible heritage resources authority and furnish it with details regarding the location, nature and extent of the proposed development.

APPENDIX B: IDENTIFICATION OF ARCHAEOLOGICAL FEATURES AND MATERIAL FROM COASTAL AND INLAND AREAS:

Guidelines and Procedures for Developers

Shell Middens

Shell middens can be defined as an accumulation of marine shell deposited by human agents rather than the result of marine activity. The shells are concentrated in a specific locality above the high-water mark and frequently contain stone tools, pottery, bone and occasionally also human remains. Shell middens may be of various sizes and depths, but an accumulation which exceeds 1 m² in extent, should be reported to an archaeologist.

Freshwater Mussel Middens

Freshwater mussels are found in the muddy banks of rivers and streams and were collected by people in the past as a food resource. Freshwater mussel shell middens are accumulations of mussel shell and are usually found close to rivers and streams. These shell middens frequently contain stone tools, pottery, bone, and occasionally human remains. Shell middens may be of various sizes and depths, but an accumulation which exceeds 1 m² in extent, should be reported to an archaeologist.

Stone Artefacts

These are difficult for the layman to identify. However, large accumulations of flaked stones which do not appear to have been distributed naturally should be reported. If the stone tools are associated with bone remains, development should be halted immediately, and archaeologists notified.

Fossil Bone

Fossil bones may be found embedded in geological deposits. Any concentrations of bones, whether fossilized or not, should be reported.

Large Stone Features

They come in different forms and sizes but are easy to identify. The most common are roughly circular stone walls (mostly collapsed) and may represent stock enclosures, remains of wind breaks or cooking shelters. Others consist of large piles of stones of different sizes and heights and are known as *isisivane*. They are usually near river and mountain crossings. Their purpose and meaning are not fully understood; however, some are thought to represent burial cairns while others may have symbolic value.

Historical Artefacts or Features

These are easy to identify and include foundations of buildings or other construction features and items from domestic and military activities.