

# **Application for Heritage Impact Assessment Letter of Exemption for the METISS Terrestrial Fibre Optic Cable System, Amanzimtoti, Ethekewini Municipality, Kwazulu-Natal**

Prepared for

**ERM Southern Africa**

On behalf of

**Alcatel Submarine Networks (ASN), Elettra Tlc SpA and Liquid Telekom**

March 2019



Prepared by

John Gribble

**ACO Associates cc**

Physical: Unit D17, Prime Park, 21 Mocke Rd, Diep River

Postal: 8 Jacobs Ladder St James, 7945

([john.gribble@aco-associates.com](mailto:john.gribble@aco-associates.com))

Tel: 021 7064104

Cell: 078 6162961

Fax to e-mail: 086 603 7195

4 March 2019

Amafa AkwaZulu Natali  
P.O Box 2685  
Pietermaritzburg  
3200

Attention: Ms Bernadet Pawandiwa

Dear Ms Pawandiwa

**APPLICATION FOR HIA LETTER OF EXEMPTION: PROPOSED METISS TERRESTRIAL FIBRE OPTIC CABLE SYSTEM, AMANZIMTOTI, ETHEKWINI MUNICIPALITY, KWAZULU-NATAL**

ERM Southern Africa, on behalf of Alcatel Submarine Networks (ASN), Elettra Tlc SpA and Liquid Telekom has appointed ACO Associates to produce a Heritage Impact Assessment (HIA) for the proposed installation of the terrestrial portion of METISS subsea fibre optic cable system in Amanzimtoti, Ethekewini Municipality, Kwazulu-Natal. The METISS Subsea Cable System will link South Africa to Mauritius, with branches to Madagascar and Reunion.

The subsea portion of the proposed cable will make landfall and terminate at a beach manhole on Amanzimtoti's Pipeline Beach. From there a terrestrial cable will be routed to a Cable Landing Station (CLS) in the Southgate Industrial Park. Two route options from the BMH location to the CLS are under consideration (see Figures 1 and 2 in Annexure A) with the choice of the preferred route dependant on local council approval and the results of the Impact Assessment phase.

The terrestrial cable route is approximately 5 km long and the proposed cable installation therefore triggers Section 38 (1) (a) of the National Heritage Resources Act (No. 25 of 1999), for a development "categorised as the construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length". This letter serves as the notification to the responsible heritage resources authority of the proposed Project, required in terms of Section 38 (1) of the Act.

The terrestrial cable will be installed, as far as possible, along existing roads and servitudes up to the point where it joins existing infrastructure. The receiving environment is illustrated in Annexure B.

Installation will require a dedicated trench up to 1.5 m deep and 1 m wide which avoids power lines and other infrastructure. Two High Density Polyethylene ducts of approximately 110/95 mm diameter will be installed in the trench for the installation of the terrestrial cable. Manholes and other infrastructure will be installed at intervals as required along the route to provide future access to the terrestrial cable.

Given the proposed routing along and within existing road reserves, it is unlikely that heritage resources will be impacted during the installation of the terrestrial cable.

We therefore request exemption from the necessity to carry out a HIA, in terms of Section 38 of the NHRA, for the proposed Project, with the proviso that in the event of heritage material being uncovered during the installation of the terrestrial cable, the following mitigation measures will be implemented. The onus will be on the applicant to ensure that these conditions are met and the mitigation measures implemented:

- Construction activity must stop immediately if any archaeological material is encountered and the area must be cordoned off. No archaeological material may be removed from the site;
- A suitably qualified archaeologist must be called to site to assess the significance of the find and Amafa aKwaZulu-Natali (Amafa) must be notified of the find;
- Only once the archaeologist gives the go-ahead can work in the area of the find recommence;
- Under no circumstances may any archaeological material be destroyed or removed from site unless under direction of the archaeologist;
- In the event of human remains being uncovered during work, all activities in the vicinity must cease and the site made secure until a suitably qualified archaeologist and SAHRA and Amafa have been notified, the significance of the material has been assessed and a decision has been taken as to how to deal with it.

SAHRA's palaeosensitivity map (<https://sahris.sahra.org.za/map/palaeo>) shows the palaeontological sensitivity of the area within which the terrestrial cable will be installed as **high** (orange) and indicates that a desktop study is required. However, the routing of the terrestrial cable along existing roadways and servitudes and its depth of burial (1.5 m maximum) suggests that impacts on palaeontological resources are also unlikely. It is suggested, nevertheless, that a protocol for reporting palaeontological finds is commissioned from a suitably qualified palaeontologist and implemented during all intrusive ground works.

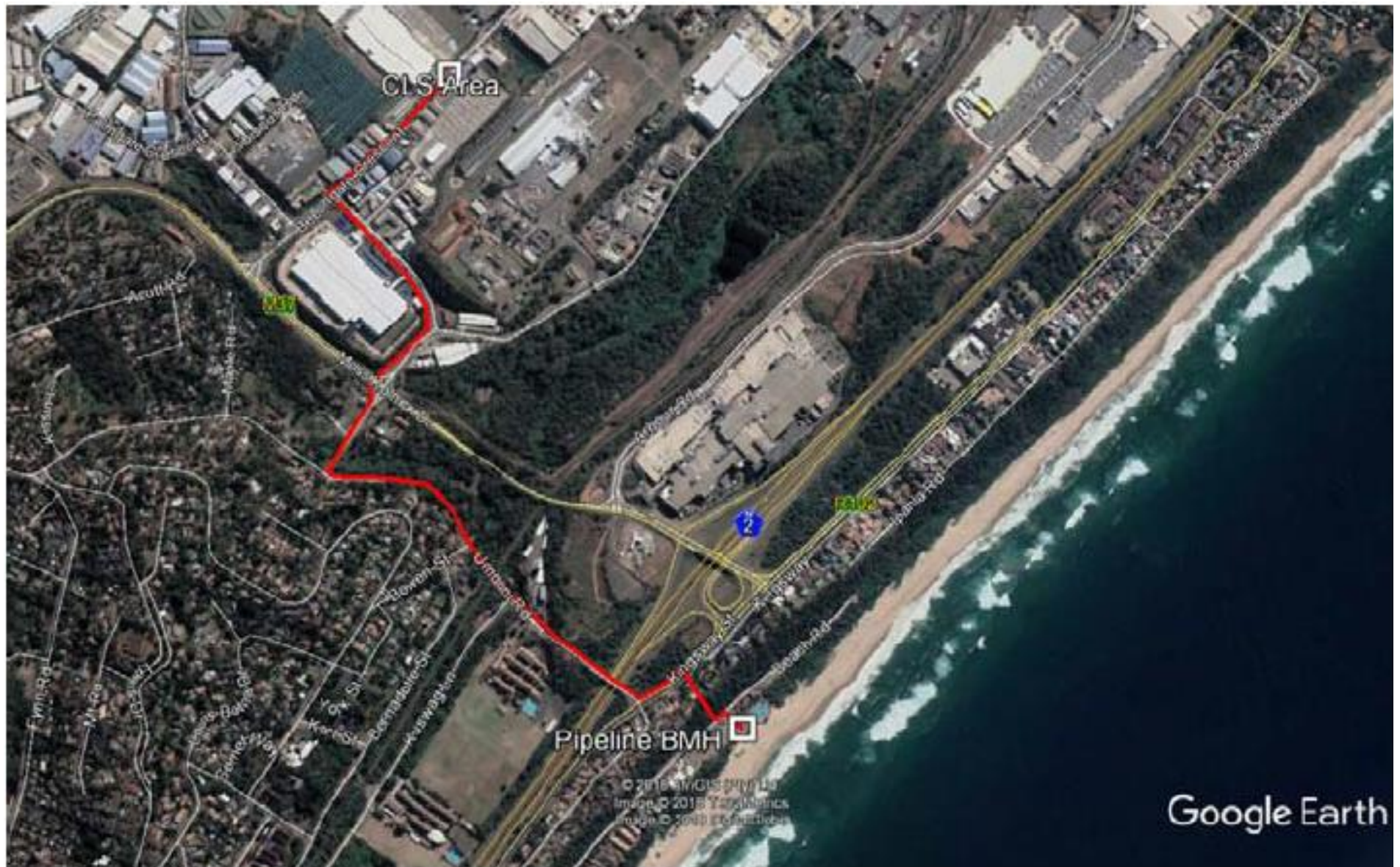
Should you require any further information please do not hesitate to contact the undersigned.

Yours sincerely



John Gribble  
Archaeologist and Heritage Specialist  
ACO Associates

## ANNEXURE A: LOCALITY MAPS



**Figure 1: Terrestrial Cable Route Option 1**



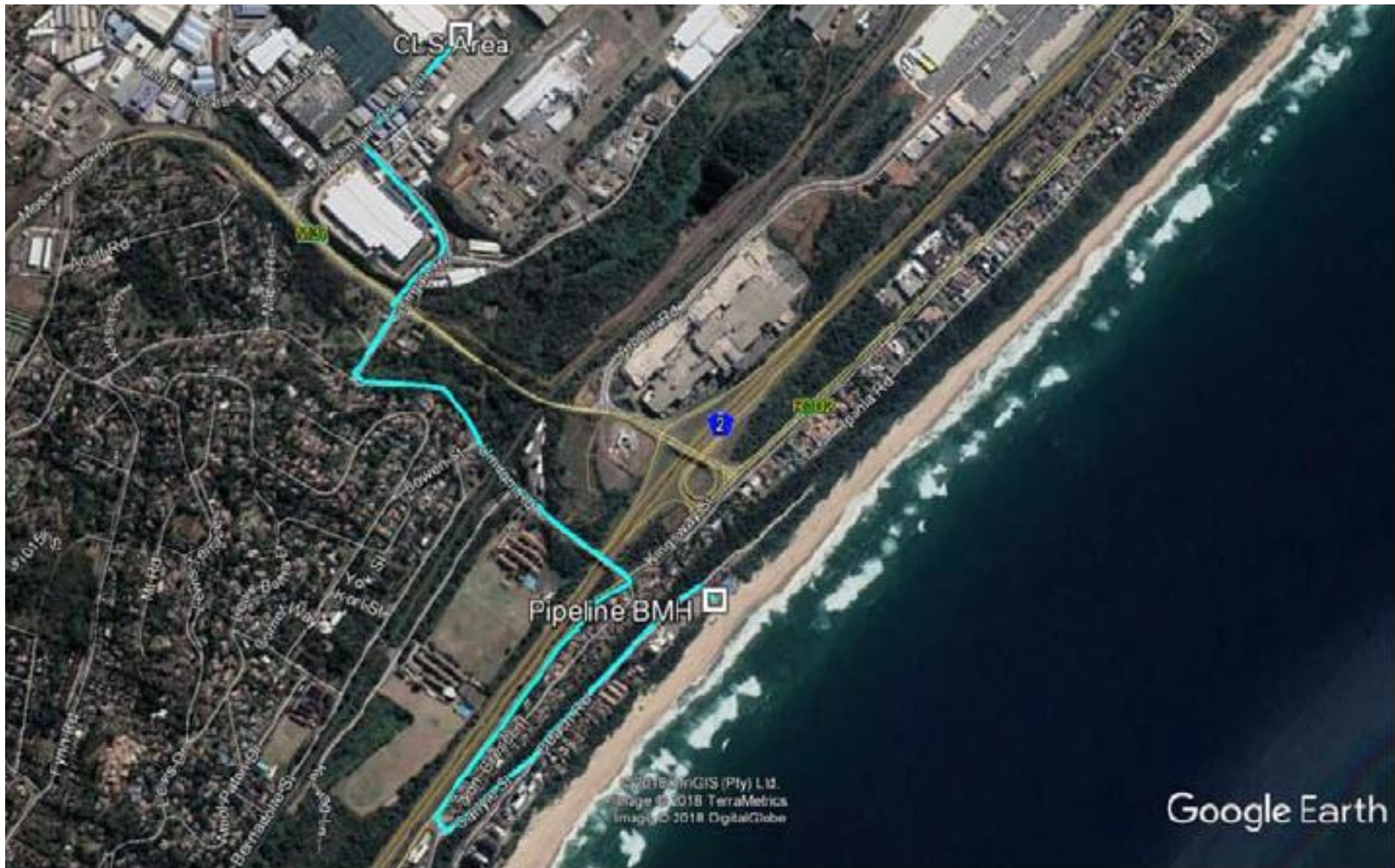


Figure 2: Terrestrial Cable Route Option 2



## ANNEXURE B: PHOTOGRAPHS OF THE PROPOSED CABLE ROUTE



**Plate 1:** The BMH will be positioned beyond the line of trees on the left and the both route options will then cross the car park and follow Beach Road south (right of image)

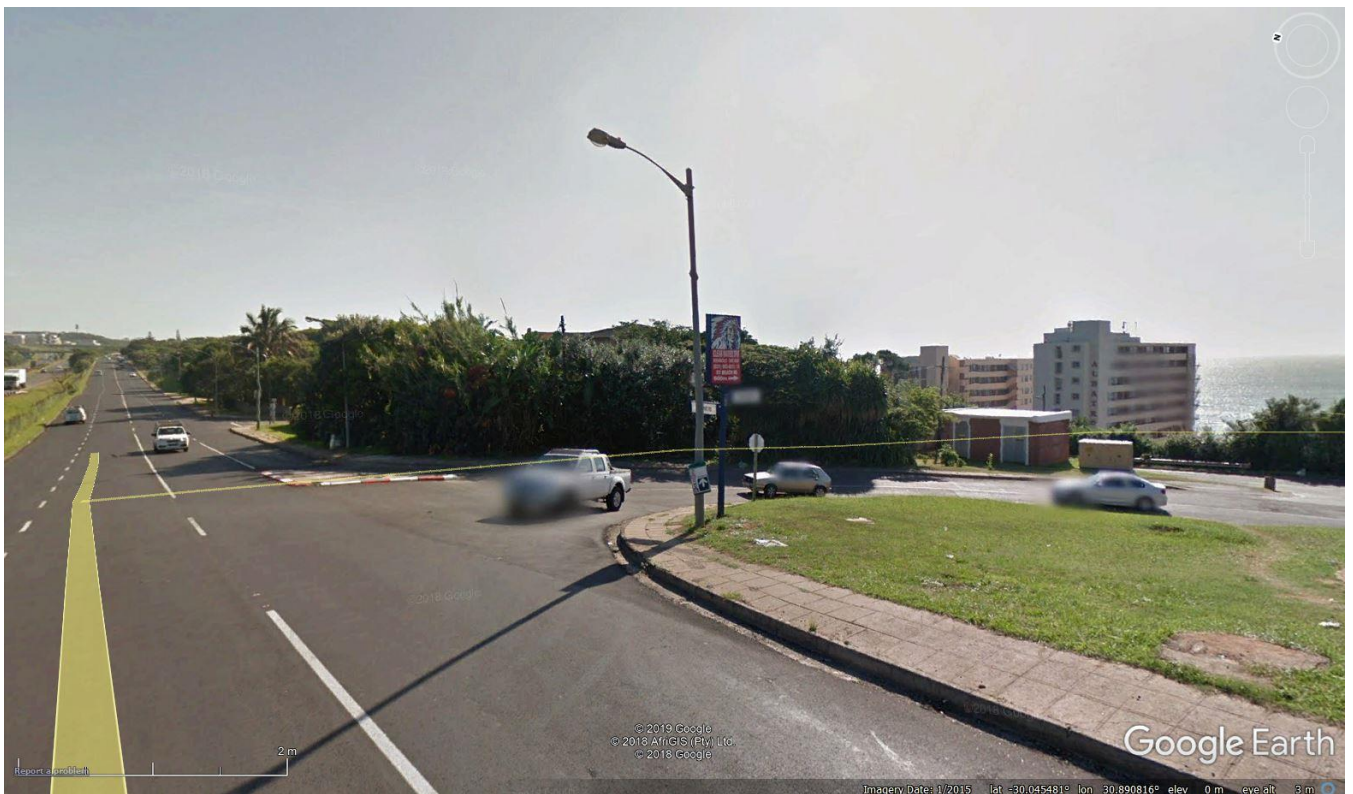


**Plate 2:** Option 1 - intersection of cable route with Kingsway





**Plate 3:** Option 2 - view south from approximately midway along Beach Road



**Plate 4:** Option 2 - view north along Kingsway from intersection with Beach Road on right





**Plate 5: Options 1 & 2 - intersection of Kingsway (left) and Umdoni Road (right)**



**Plate 6: Options 1 & 2 - view north-west across Umdoni Road bridge over N2**





**Plate 7:** Options 1 & 2 - view north-west along Umdoni Road



**Plate 8:** Options 1 & 2 - intersection of Umdoni (right) and Ashgate (left) Roads





**Plate 9:** Options 1 & 2 - view north along Ashgate Road from intersection with Moss Kolnick Drive



**Plate 10:** Options 1 & 2 - view south along Ashgate Road from entrance road to Southgate Industrial Park





**Plate 11:** Options 1 & 2 - view of Ashgate Road and Lavender Gate Crescent intersection



**Plate 12:** Options 1 & 2 - view up Lavender Gate Crescent to Southgate Industrial Park entrance