GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment ESKOM PLANNING COMMENTS

							Specialist Comme	nts
No.	Name	Affiliation	Email	Contact No	Consultations	Eskom	EIA	HIA
1	Esther A Jordan	Manley Wine Estate	esther@lando.co. za		I feel concern for the owners of Kloofzicht, Schalkenbosch & Schoongezicht etc and hope that most serious consideration will be given when deciding on the final route these pylons are expected to take.			
2	John Veschini	ETLAC	rockyvalley@telk omsa.net		The scoping documents refers to Critical Viewpoint Analysis, and yet no such analysis is evident in the data discs.			
					The Critical Viewpoint Analysis photos in the document are misleading to the public for two reasons: The viewpoint in respect to Gouda, Tulbagh, Wolseley, Ceres, P. A. Hamlet areas etc is taken from such a height so as to limit the real visual impact and also the power line structures depicted in the photographs do not appear to relate to the type & size of the intended power line structures & appear to rather be standard photos taken of 25m 400kv power lines such as those near Wolseley.			
					Eskom has used what I term "underhanded & bullying" tactics from day one of the EIA process. Officials telling farmers "you can sign the Servitude document as your neighbour has signed" when in fact it was not true, was one of the tactics.			
					The current route map has apparently deviated substantially towards Gouda from initial route maps provided by Eskom and in fact will now traverse a residential area. That community had not been consulted about the impact of the power line then & now with this HIA application either. Thus how can I & AP's in that area be determined in terms of tha HIA application?			
					Place the line underground for the long term benefit of this community, the public of South Africa & Eskom in terms of maintenance costs & risks to the line & this nightmare might goo away or atleast for the Tulbagh residents & those needing power soon as a result of the apparently atrocious forward planning by Eskom that we have all been made aware of.			
3	Niki de Wolf	Owner of the historic Schoonderzic ht Farm & Moniki Chocolatier in		023 230 0673	Eskom has assured us the power lines would not have any impact on Schoonderzicht Farm. We now know that the pylons are going to cross right over historic Steinthal who is our neighbor. Steinthal & Schoonderzicht will be impacted immensely			

				V.		Sp	ecialist Commer	nts
No.	Name	Affiliation	Email	Contact No	Consultations	Eskom	EIA	HIA
		Tulbagh						
	George Mills	Chairman, Tulbagh Tourism	suarachas@yaho o.com	023 230 1756	I propose that an alternative route be utilised thereby removing (or atleast reducing) the adverse impact on Tulbagh's thriving industry. Alternatively a new Social & Environmental Impact Study must be carried in order to reassess the viability of the preferred route given how critically important Tourism has become to Tulbagh's community & its fragile economy since the initial findings of 2002.			
	R.W Summers	Smith Ndlovu Summers Environmenta I Law Specialists on behalf of Elizabeth Parker, owner of Elandsberg Farms & Nature Reserve	rwsummers@law. co.za	021 424 5826	The alternative route alignment for the 765kV transmission line utilised for the purposes of the HIA Scoping report fail to take into account the document entitled Report on Alternatives prepared by Eskom in 2004. In terms of the latter document, Eskom amended the original route alignments apparently in order to take into account concerns then raised by certain interested & affected parties in the Tulbagh valley. The final route identified by Eskom in the Report on Alternative as the preferred route differs markedly from the proposed alternative route alignments on the basis of the EIA process. SEE FULL REPORT ATTACHED AS LETTER TO PD NAIDOO			
	Anthony Silberg	Director, Tulbagh Heritage Agency	hotcom@telkoms a.net	023 230 0100	It is clear that the structure & the composition of the generation philosophy & plants needs to be set & agreed before transmission grid is developed			
					The volatility in energy prices for fossil fuels is such that alternatives must be developed			
					If more nuclear alternative plants are developed at the coast there would be no need for expanding the transmission capacity	Even if new nuclear comes to W. Cape the line will be required to evacuate power to the inland, until then the line is required to transmit electricity to meet the growing demand in the W. Cape - E Grunewald		
					The one option would be to shelve to a 765 kV until a comprehensive energy plan is agreed	(Eskom)		

						Spe	cialist Comments	
No.	Name A	Affiliation	Email	Contact No	Contact No Consultations	Eskom	EIA	HIA
					At the presentation held at Morgansvlei we were assured that Eskom would develop nuclear generating plants in the Western Cape effectively doubling Koeberg's capacity to 3600 Mega watts. Yet barely two weeks later news reports intimated that Eskom was shelving the entire nuclear programme. This raises the question once again if Eskom has any idea at all of what it proposes.			
					It is no brainer that in view of the instability & fluctuations in the price of coal it is not rational & logical to put all your eggs in the fossil fuel generating basket. To only develop coal fired systems in Mpumalanga & then route power over 1500 km to the Western Cape indicates a severe lack of strategic planning competence. Furthermore there will be ongoing security problems to protect these lines from possible sabotage.			
					If however in spite of all the logical reasons Eskom still arrogantly continues to go ahead with the 765 KVA line it should follow the same route of the present 499KVA line. The reasons given for the need to divert the line through the Tulbagh are ill considered and feeble. It will be far simpler to overcome these problems & use the existing route			
7	Joe de Villiers / Francis Swanepoel	I & AP	rondawel@lantic. net		What is the possibility of putting the cables in a dark colored pipe running underground?	Underground cannot be financially accommodated and would also have a bigger visual impact because of the 2 x substations that would be required - E Grunewald (Eskom)		
8	Wendy Upcott		gwenrobin@mweb. co.za.	023 230 0893	Why can't the existing route through the valley be followed?			

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment DIGITAL PHOTOS COMMENTS

							Specialist Comme	nts
No.	Name	Affiliation	Email	Contact No	Consultations	Eskom	EIA	HIA
1	Esther A Jordan	Manley Wine Estate	esther@lando.co. za		Have a 3D perspective of the Tulbagh Valley with the proposed pylons superimposed in their positions so that we can have a better understanding of exactly were these pylons will be located & a view of how they will look			
2	John Veschini	ETLAC	rockyvalley@telk omsa.net		Requests to Eskom & its consultants to provide better photographs than those that were depicted in the mapping document placed in the local library (which were inadequate, hardly visible & doubted to be accurate depictions of the proposed powerline & the Tulbagh valley			
3	Niel de Jager	Chairman, Tulbagh Ratepayers & Inwoners Forum	acdejager@absa mail.co.za	023 230 0233	Although it has been requested on numerous occasions for us to have some indication as to what this power line would look like, either in the form of an artist's impression or computer generated images, we have had no reaction from Eskom or the consultants.			
4	Niki de Wolf	Owner of the historic Schoonderzic ht Farm & Moniki Chocolatier in Tulbagh	info@schoonderz icht.com	023 230 0673	I also want to make note of the fact that Eskom has not made any effort to show residents what the pylons will look like & where exactly they will be sited			

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment OTHER COMMENTS

						Spe	cialist Comments	
No.	Name	Affiliation	Email	Contact	Other	Eskom	EIA	HIA
	John Veschini	ETLAC	rockyvalley@telkoms a.net		The Power Line project is of importance to all who will suffer from the sight as well as other negative impacts-not atleast probable health issues	Health is not an issue because the line is built to avoid this .E Grunewald (Eskom)	Dealt with it in the original EIA report	
					An airstrip that has been used for years by the farming community of the Tulbagh valley for their crop spraying needs and other negative visual cultural landscape have not been identified in the report	We would have to accommodate airstrips in finalising the alignment of the route E Grunewald (Eskom)	Dealt with it in the original EIA report	
2	Niki de Wolf	Owner of the historic Schoonderzic ht Farm & Moniki Chocolatier in Tulbagh	info@schoonderzicht. com	023 230 0673	The EIA process which Eskom has followed so far has been inadequate and unfair			
3	George Mills	Chairman, Tulbagh Tourism	suarachas@yahoo.c om	023 230 1756	The Social & EIA carried out in 2002 was conducted at a time when tourism was far less important to Tulbagh's social & economic environment and way before the ROD at Schalkenbosch. In the past 5 years the local economy has been transformed by the growth o			
1	R.W Summers	Smith Ndlovu Summers Environmenta I Law Specialists on behalf of Elizabeth Parker, owner of Elandsberg Farms & Nature	rwsummers@law.co. za	021 424 5826	Failure to make hard copies of the HIA scoping report timeously available has made it difficult for the client to assess the contents of the report SEE FULL REPORT ATTACHED AS LETTER TO PD NAIDOO		Hard copies of all documents were provided to Eskom in plenty of time for public consultation - Tassie Clarke (VIA)	
	Anel	Reserve Senior Writer,	anel.powell@inl.co.z	021 488	What is the estimated cost of the project & when will a decision be			
	Powell	Cape Times	<u>a</u>	4717	made on the proposed transmission line?	The Base of the Land		
5	John Haddad		john.haddad@pamgo lding.co.za	082 345 2258	What are the health implications on the population living nearby the powerlines and how far does one need to be to the lines for them to be a health risk?	The lines are constructed to have no health risk to any one - E Grunewald (Eskom)		
	Christine Bond		No contact, no email (from the comment form)		How do you camouflage a 48m construction so that people will not see it?	The best camouflage for the towers is to leave the tower to oxidise, which then blends into background vegetation - E Grunewald (Eskom)		

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment VISUAL COMMENTS

1							Specialist Comments	
No.	Name	Affiliation	Email	Contact No	Visual	Eskom	EIA	HIA
	Niel de Jager	Chairman, Tulbagh Ratepayers & Inwoners Forum	acdejager@absamail .co.za	023 230 0233	Little information on the disastrous visual impact the proposed line would have for the Tulbagh area and its valleys and also how it looks like	•	Photographs can be mosaiced together to give a <i>subjective impression</i> of the impact of the powerlines on the valley, but cannot provide hard data about the actual impact of these structures, and would not satisfy the assessment criteria as set out in the terms of reference - Photographs can be mosaiced together to give a subjective impression of the impact of the powerlines on the valley, but cannot provide hard data about the actual impact of these structures, and would not satisfy the assessment criteria as set out in the terms of reference. A technical drawing showing the shape and dimensions of the pylons to be used for the 756kV line was provided in the original Environmental Impact Assessment - Tassie Clarke (VIA)	
	Joe de Villiers / Francis Swanepoel	I & AP	rondawel@lantic.net		The visual impact of the proposed line was not presented to the attendees (nor is it included in the material given to us). Nowhere could one get an idea of the actual scale of the pylons in relation to the major features of the valley or the actual effect of these on the views from various points in the valley or from major roads leading into Tulbagh or through the valley or the Nuwekloof Pass. There were very colourful maps with bright colour-coded "contours" representing some theoretical formula of the effective visual height of the line in relation to ones distance from it I am afraid this does not do it! I am sure that Eskom spent a substantial amount of our money on this impact assessment and one would think that the kind of expertise they appointed would have at least come up with some realistic 3D presentaions of the vallley with the REAL SIZE LINE superimposed in 3D on itWhat is worse is that the presentation was, in fact, misleading. When asked for a photograph of one of these new pylons, we were shown a photograph of a pylon		In answer to the comments from the public meeting, a 3D Google model was supplied to PDNA within the last few weeks showing the proposed pylons, scenic routes, conservation worthy buildings etc superimposed on the Google Earth Landscape. It was requested that this data be supplied to all interested and affected parties. A one-day public workshop was also advised. It should be noted however that as per the terms of reference – the visual information is supplied in respect to heritage issues specifically, i.e. visual impact from scenic routes, provincial heritage sites, etc. It has been the decision of the Department of Environment and Tourist not to publish this Google Model - Tassie Clarke (VIA) Therefore the visual impact of the line was	
					taken somewhere in the winelands (judging from the vegetation in the background (fruit orchard, vines, etc.)) THIS AFTER WE WERE TOLD IN THE PRESENTAION THAT THE ONLY EXISTING PYLONS OF THIS (PROPOSED) SIZE ARE NEAR DE AAR / SOMEWHERE IN THE KAROO.) When I pointed this out to one of the representatives at the presentaion they admitted that the picture showed a "normal" pylon and not one of the large proposed ones. WHAT IS THE USE!?		assessed at locations selected by the heritage consultant as 'critical viewpoints'. At these locations, an in depth technical assessment was carried out to assess the visibility of pylons, their distance from the viewpoints and their ability to be absorbed into their surroundings, etc. This information, together with the heritage findings was used to classify hotspots according to High, Medium, Low or Subject to further investigation. E.g. Tulbagh Valley was	

							Specialist Comments	
No.	Name	Affiliation	Email	Contact No	Visual	Eskom	EIA	HIA
							classified as high impact and by definition this means that the impact of the line from a heritage / visual impact perspective requires further investigation - Tassie Clarke (VIA)	
3	Mike Hunter		mhunter@intekom.co	023 230 1544	It was of paramount importance to show the visual effect of the proposed new power line as it traversed the Tulbagh Valley but this was not done. One cannot make objective comment without seeing this. Hopefully concerned parties will be given the opportunity to view the perspective referred to in "A" above before any decision is taken in the matter		The issue of a lack of visual perspectives of the proposed line through the Tulbagh Valley has been raised by a number of I&APs. It is important to note that a VIA of the proposed transmission line has previously been undertaken in terms of the EIA process. It is not the role of the visual assessment being undertaken in terms of the HIA process to redo this study. Rather the role of this study is to inform heritage issues in terms of a set of defensible visual data. However, it is noted that the technical nature of this information may not be easily accessible to the general public. A range of alternative visual methods have been discussed with ESKOM including photo montages and 3D modelling. However, DEAT DEAT has made a decision that additional visual information is not necessary. (Baumann & Winter Heritage Consultants).	
4	Chris Wright		wright@wcaccess.co. za	022 448 1081	There will be a large impact on the valleys		In terms of the requirement from the heritage authorities for an integrated & visual study, the scope of work for the VIA was informed by heritage issue, i.e. to investigate the potential visual impact on heritage resources only - Tassie Clarke (VIA)	
5	Wendy Upcott		gwenrobin@mweb.co .za.	023 230 0893	I am very concerned about the negative visual impact of huge pylons close to our town, also about potential health risks of living near them	The lines are constructed to have no health risk to any one - E Grunewald (Eskom)	Photographs can be mosaiced together to	

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment SOCIAL COMMENTS

				- 4= -11		Specialist Comments				
No.	Name	Affiliation	Email	Contact No	Social	Eskom	EIA	HIA		
1	Esther A Jordan	Manley Wine Estate	esther@lando.co.za		The lines will have a negative impact on tourism	Eskom will do valuations on the impact of land use & will apply the process of payment as per Expropriation Act which takes actual financial loss into account - E Grunewald (Eskom)	Dealt with it in the original EIA report			
	John Veschini	ETLAC	rockyvalley@telkoms a.net		The impact on tourism, the loss of a potential for long term sustainable jobs as a result of tourism spin-offs, the permanent destruction of a valley steeped in history, the probable destruction of the treasured heritage of the valley as a result of the former & the loss of jobs through much needed development which will have no appeal to investors as a result of the impact of these 'horrific' powerlines that are proposed to traverse through the valley	Eskom will do valuations on the impact of land use & will apply the process of payment as per Expropriation Act which takes actual financial loss into account - E Grunewald (Eskom)	Dealt with it in the original EIA report			
3	Niel de Jager	Chairman, Tulbagh Ratepayers & Inwoners Forum	acdejager@absamail .co.za	023 230 0233	The residents would suffer irreparable loss especially taking into account that Tulbagh is dependent heavily on income produced by tourism. Property value and any other developments like the lifestyle village, golf estate & the Digby will be adversely affected especially as the lines are passing through the golf estate	Eskom will do valuations on the impact of land use & will apply the process of payment as per Expropriation Act which takes actual financial loss into account - E Grunewald (Eskom)	Dealt with it in the original EIA report			
	George Mills	Chairman, Tulbagh Tourism	suarachas@yahoo.c om	023 230 1756	It would appear that no assessment has been made on the impact to the Tulbagh valley on tourism, agri-tourism is the future of this valley and this proposed scheme will have a serious visual impact on the attractiveness of this valley. Negative effect on tourism which is the single largest employer in the Tulbagh valley	Eskom will do valuations on the impact of land use & will apply the process of payment as per Expropriation Act which takes actual financial loss into account - E Grunewald (Eskom)	Dealt with it in the original EIA report			
	Joe de Villiers / Francis Swanepoel	I & AP	rondawel@lantic.net		The economy & livelihood of many will be negatively affected	Eskom will do valuations on the impact of land use & will apply the process of payment as per Expropriation Act which takes actual financial loss into account - E Grunewald (Eskom)	Dealt with it in the original EIA report			
ł	Chris Wright		wright@wcaccess.co. za	022 448 1081	Tourism will be severely impacted	Eskom will do valuations on the impact of land use & will apply the process of payment as per Expropriation Act which takes actual financial loss into account - E Grunewald (Eskom)	Dealt with it in the original EIA report			
	Wendy Upcott		gwenrobin@mweb.co.z a.	023 230 0893	It will have a negative impact on our property prices not to mention future investment in our town and also tourism, from which I make a living	Eskom will do valuations on the impact of land use & will apply the process of payment as per Expropriation Act which takes actual financial loss into account - E Grunewald (Eskom)	Dealt with it in the original EIA report			

			Specialist (Comments				
No.	Name	Affiliation	Email		Social	Eskom	EIA	НІА
8	John du Toit		No contact, no email (from the comment form)		Should the proposed northern route be decided upon it would mean that the approved development on Saglevlei / Delta / Schalkenbosch cannot take place, which means ±R2.5 b development loss as well as 800 potential employment loss	The proposed developments will betaken into account when finalising the final alignment of the route - E Grunewald (Eskom)	Dealt with it in the original EIA report	
9	Peter Jackson		No contact, no email (from the comment form)		The original EIA did not take into account the socio economic impacts of R1.2 b investment and ±600 sustainable jobs that would be created by the approved golf course & conservation estate	Eskom will do valuations on the impact of land use & will apply the process of payment as per Expropriation Act which takes actual financial loss into account - E Grunewald (Eskom)	Dealt with it in the original EIA report	
					The choice of the central route will severely impact on the growth of Tulbagh and its tourist potential		Dealt with it in the original EIA report	
10	Christine Bond		No contact, no email (from the comment form)		Why destroy a growing tourism industry by transversing our historical town?			The alternative alignments for the transmission lines do not traverse the historical town of Tulbagh. The main alternative traverses the agricultural setting to the south but will not be visible from the historical core of the town
								(Baumann & Winter)

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment HERITAGE COMMENTS

			A was a second				Spi	ecialist Comments
No.	Name	Affiliation	Email	Contact No	Heritage	Eskom	EIA	HIA
1	John Veschini	ETLAC	rockyvalley@tel komsa.net		The nature of the valley, the scenic beauty, the appeal of the historical town, the architectural treasures etc. will be lost posterity & will also be lost to the community forever		Dealt with it in the original EIA report	
2	Niki de Wolf	Owner of the historic Schoonderzic ht Farm & Moniki Chocolatier in Tulbagh	info@schoonde rzicht.com	023 230 0673	An alternative route must be utilized, outside of Tulbagh. As the owner of Schoonderzicht - a farm that has been declared a national monument - I am extremely concerned about the negative impact that the proposed Eskom power line will have on the future prospects of our valley and in particular the extremely negative effect it will have on its historical value and growing tourism industry. Eskom assured us the power lines would not have any impact on Schoonderzicht Farm. Now the pylons are going to cross right over historical Steinthal. Schoonderzicht and Steinthal will be impacted immensely. The residents have not been shown what the pylons will look like and where exactly they will be sited. I have requested this information several times especially since Schoonderzicht Farm is so close to the existing pylons.			The heritage scoping report has identified the proposed main alternative through the Tulbagh Valley as a high heritage hotspot in terms of its potential visual impact on experiential qualities of its cutlural landscape, i.e. approach roads, homestead settings, mountain backdrop, intact rural landscape. The proposed alignment of the main and central alternatives do not pass over Steinthal. Steinthall is situated some 2km from the proposed alignment of either alternative. A critical viewpoint analysis of the impact of the central alternative on the Steinthal church indicates a medium to low impact. Views from the Steinthal church will be not affected by the proposed alignment of the main alternative. Of concern is the proximity of the central alternative in relation to the Schooderzicht farmstead,. The line traverses the mountain backdrop within 1km of the homestead. The main alternative is located about 2km away from the homestead (Baumann & Winter).

				S. B. S. S. S. S. S. S.		E FEET STATE		San alallat Community
		Affiliation		Cantact No	Uaritana	Fakam	EIA	Specialist Comments
No. 3	Henry Aikman	Independent Heritage Specialist	email aikman@wol.co .za	023 230 1470	The HIA scoping report does not identify the amount of potential heritage impacts with high significance in the broader Tulbagh region PLEASE SEE FULL REPORT ATTACHED AS ANNEXURE A	Eskom	EIA	The brief for Section E:Historical Overview was to present at a very general level, an overview of the expansion of the settlement from the Cape into the interior, highlighting major events which played a role in that expansion as well as identifying the changing boundaries of the Cape 'Colony', as illustrated for example by the expansion of the adminsitrative centres. The vaste area that was covered by the line, from Melkbosstrand to Victoria West, necessitated the extraction of essential information as far as possible; assessing the historical significance against the remaining historical fabric-be that built environment, routes & outspans or avenues of trees. The bulk of the critism of the historical overview focuses on the Tulbagh valley & its immediate context & an apparant lack of detail; the focus of the study was not on the Tulbagh Valley & as such these details were not included. The purpose of the study as a heritage scoping exercise, was to identify areas of high heritage value which would be negatively impacted by the proposed powerline, to be earmarked for further study. The critism of the overview as a 'meaningless academic exercise' is rendered invalid by the commentator's own 'academic' meanderings & does not warrant any comment. (Harriet Clift) The HIA scoping study is not limited to age-based criteria. See also my response to comment from Smith, Nlovu & Summers (Baumann & Winter) The consultation process is limited to the appellants as per the instructions from the Minister of DEAT. The need for more extensive consultation including the Drakenstein Heritage Foundation and the Swartland Heritage Foundation need to be discussed with DEAT and HWC (Baumann & Winter)

								Specialist Comments
No.	Name	Affiliation	Email	Contact No	Heritage	Eskom	EIA	HIA
								The Schalkenbosch Conservancy and its associated Renosterveld has been added to the Heritage Resource Map for the Tulbagh Valley and will be addressed during the impact assessment phase. This is not strictly a heritage issues by the NHR Act does specify "rare or endangered aspects of SA's natural or cultural heritage" (Section 3.3 b) and demonstrating characteristics of a particular class of SA's natural or cultural heritage" (Section 3.3 d). (Baumann & Winter)
								Mr Aikman's comments regarding the inadequate landscape assessment of the Tulbagh Valley need to be addressed by way of a more detailed landscape character assessment as recommended in the HIA scoping report. This further assessment needs to include the definition of what constitutes the boundaries of a potential Grade 1/2 heritage site. This is not a simple exercise. Some of the information provided by Mr Aikman is useful in this regard but a suggestion that the entire Tulbagh Valley is worthy of a Grade 1/2 heritage status is not supported. Consideration also needs to be given to the fact that a golf estate has now been approved within the southern context of the Tulbagh Valley which has major implications for how the boundaries of the potential Grade 1/2 heritage site are designation. No doubt the gold estate will be excluded from such a designation. (Baumann & Winter)
4	Ashley Lillie	Heritage Specialist			The HIA scoping report deems the impact of the transmission line on Elandsberg Farms to be of medium to high significance, which is incorrect as the Elandsberg Nature Reserve has been declared a provincial nature reserve as well as Natural heritage site PLEASE SEE FULL REPORT ATTACHED AS ANNEXURE B			He takes issue with the fact that the report identifies the potential impact of the southern alternative on the landscape setting of Bosplaas homestead as a MEDIUM to LOW HERITAGE HOTSPOT. This is incorrectly reported as the Historical Built Environment and Landscape Study identifies this as a MEDIUM to HIGH HERITAGE HOTSPOT. (Baumann & Winter)

		Province Wall				1		Specialist Comments
No.	Name	Affiliation	Email	Contact No	Heritage	Eskom	EIA	HIA
								The HIA needs to take into account the heritage significance of the natural landscape comprising the Elandsberg Nature Reserve (Baumann & Winter)
								The HIA needs to take into account the visual impact of the current transmission lines through the property. The additional visual impact of the proposed 765kV transmission line needs to be examined (Baumann & Winter)
								A site inspection needs to be undertaken by the HIA consultants in order to clarify the full nature and extent of the visual/heritage impacts of the southern alternative on the property. (A site inspection has recently been undertaken by Tassie Clark, Nicolas Baumann & myself - we are of the opinion that the visual impact of the lines on Bosplass homestead are not serious. However, the impact on the cultural landscape as a whole are of concern given the already high visual impact that the existing lines have on the property). (Baumann & Winter)
								Portions of the property warrant GRADE 2 heritage status. However, the boundaries of this suggested GRADE 2 landscape and the declared Nature Reserve need to be clarified. (Baumann & Winter)
5	Dr John Manning	SA National Biodiversity			The Elandsberg Nature Reserve is a core conservation area for two localised & highly endangered vegetation types in the Western Cape. PLEASE SEE FULL REPORT ATTACHED AS ANNEXURE C			
6	Professor L	Dept of	LM3@sun.ac.z	021-808-	The Elandsberg Nature Reserve is home to largest patch of very			
	Mucina	Botany & Zoology , Univ of Stellenbosch	а	3067	rare Swartland Alluvial Fynbos and houses also some patches of shale renosterveld, full of species of conservation interest - rare & endemic. PLEASE SEE FULL REPORT ATTACHED AS ANNEXURE D			
7	Anthony Silberg	Director, Tulbagh Heritage Agency	hotcom@telkoms a.net	023 230 0100	Objection of the 765KVA line from Mpumalanga to the Western Cape & the objection of routing the power line through Tulbagh in order to preserve its heritage			According to Mr Silberberg, the Tulbagh Heritage Agency represents a number of parties concerned with the preservation of the heritage of the Tulbagh area. Objections are made to the purported "ill- conceived" nature of the project rather than heritage issues. (Baumann & Winter Heritage Consultants)

	TO A DATE	Part The Telephone						Specialist Comments
No.	Name	Affiliation	Email	Contact No	Heritage	Eskom	EIA	HIA
8	Joe de Villiers / Francis Swanepoel	I & AP	rondawel@lanti		The heritage of this valley does not only consist of a few homesteads which have been selected by Eskom's consultants. The fact of the matter is that the ENTIRE VALLEY is an important heritage area. A few facts to consider is that this valley was (for many decades) the only gateway to the interior. The first pass (remnants are still visible) through the mountains was at Roodezand / Oude Kloof. The first (and still the only) railway line linking the Cape with the interior is though this valley. My argument is that this unsightly power line will impact on these historical routes as much as they will on the views from selected homesteads, etc. The valley is also home to a number of well-preserved blockhouses along the above-mentioned railway line.			It is inconceivable that anyone who has read the heritage scoping report and its specialist studies can claim that the scope of work has been limited to a few homesteads. From the perspective of the cultural landscape and historical built environment specialist study a wide range of heritage resources were identified including scenic routes, mountain backdrops, significant rural landscapes, historical townscapes, historical farmsteads, historical routes and passes, historical graveyards, VOC outposts, outspans, blockhouses. Furthermore the identification of heritage resources was undertaken at 2 scales, i.e. the broader landscape and individual site scale. In this regard, the specialist study identifies the Upper Tulbagh Valley as a possible Grade 1 heritage resource. The potential visual impact of the proposed transmission line on the historical route network is a key issue addressed in the study (Baumann & Winter Heritage Consultants)
9	Peter Jackson		No contact, no email (from the comment form)		Which of the paths the route of the lines will take? From the perspective of retaining the historical and tourist value of the valley, the Southern alternative route, where the existing pylons stand, would be the least intrusive. The preferred route would have seriously detrimental consequences for the Tulbagh valley as a whole.			The impact assessment phase of HIA process needs to provide a comparative assessment of the alternatives. The focus of the scoping phase has been on the identification of heritage issues and concerns for all the alternatives The proposed alignment of the main alternative through the Tulbalgh Valley has been identified as a high level heritage hotspot which has a potential no-go implication (Baumann & Winter Heritage Consultants).
					The heritage assessment indicate that the central route through the Tulbagh vale impacts the greatest on the heritage value of Tulbagh than the existing Wolesly route			The heritage scoping report identifies the main alternative through the Tulbagh Valley as a high level heritage hotspot as opposed to the southern alternative which is identified as a medium to low level heritage hotspot (Baumann & Winter)
					The demographics of Tulbagh have changed significantly in the last 6 years with a substantial investment being made in restoration & rehabilitation			This matter will be discussed with DEAT. A separate social-economic study was not part of the scope of work for the HIA as discussed with Heritage Western Cape (Baumann & Winter)
					The proposed central route will be built through a 1000ha conservancy placed under the Cape Nature Stewardship and			In response to a request from Baumann & Winter heritage consultants, information

					Specialist Comments			
No.	Name	Affiliation	Email	Contact No	Heritage	Eskom	EIA	HIA
10.	- Name	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			containing red book species identified as environmentally sensitive and endangered			has been provided by Mr Jackson which clarifies the nature and extent of the conservancy area (Baumann & Winter).
10	Christine Bond		No contact, no email (from the comment form)		What impact will these powerlines have on the flora, fauna & human habitation?	The line is not planned to cross any towns E Grunewal d (Eskom)		These issues were addressed in the EIA process and do not form part of the scope of work for the HIA (Baumann & Winter)
11	Jayson Clark	Secretary of the Tulbagh Valley Heritage Foundation			The TVHH endorses the conclusions reached by the consultants Baumann & Winter that the potential heritage impact of the Main Alternative alignment on the Tulbagh Valley will be high. It also supports the identification of the Tulbagh Valley as a High Level Heritage Hotspot and the implication flowing from this that the Main Alternative alignment through the Valley should be considered a nogo option.			It is noted by Baumann & Winter Heritage consultants that the Tulbagh Valley Heritage Foundation is in support of the findings of the specialist Cultural Landscape and Built Environment study.

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment LEGAL COMMENTS

								Specialist Comments
No.	Name	Affiliation	Email	Contact No	Legal	Eskom	EIA	HIA
1	John Veschini	ETLAC	rockyvalley@telk omsa.net		The National Heritage Resource Act (Act 25 of 1999) should be used as a criteria for assessing the heritage significance of a place such as Tulbagh: Its importance in the community or pattern in South Africa's history			To be addressed during the impact assessment phase (Baumann & Winter)
					The National Heritage Resource Act (Act 25 of 1999) should be used as a criteria for assessing the heritage significance of a place such as Tulbagh: Its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage			To be addressed during the impact assessment phase (Baumann & Winter)
					The National Heritage Resource Act (Act 25 of 1999) should be used as a criteria for assessing the heritage significance of a place such as Tulbagh: Its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage			To be addressed during the impact assessment phase (Baumann & Winter)
					The National Heritage Resource Act (Act 25 of 1999) should be used as a criteria for assessing the heritage significance of a place such as Tulbagh: Its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects			To be addressed during the impact assessment phase (Baumann & Winter)
					The National Heritage Resource Act (Act 25 of 1999) should be used as a criteria for assessing the heritage significance of a place such as Tulbagh: Its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group			To be addressed during the impact assessment phase (Baumann & Winter)
					The National Heritage Resource Act (Act 25 of 1999) should be used as a criteria for assessing the heritage significance of a place such as Tulbagh: Its importance in demonstrating a high degree of creative or technical achievement during a particular period			To be addressed during the impact assessment phase (Baumann & Winter)
					The National Heritage Resource Act (Act 25 of 1999) should be used as a criteria for assessing the heritage significance of a place such as Tulbagh: Its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.	0		To be addressed during the impact assessment phase (Baumann & Winter)
					The National Heritage Resource Act (Act 25 of 1999) should be used as a criteria for assessing the heritage significance of a place such as Tulbagh: Sites of significance relating to the history of slavery in South Africa			To be addressed during the impact assessment phase (Baumann & Winter)
2	Niel de Jager	Chairman, Tulbagh Ratepayers & Inwoners Forum	acdejager@absa mail.co.za	023 230 0233	The study has not been properly done and does not meet the legal requirements and the Record of decision issued in 2006			

								Specialist Comments
No.	Name	Affiliation	Email	Contact No	Contact No Legal	Eskom	EIA	HIA
3	R.W Summers	Smith Ndlovu Summers Environmen	rwsummers@law. co.za	021 424 5826	Consideration of all relevant environmental factors as part of Section 2 of the National Environmental Management Act were not taken into consideration.(RW Summers) PLEASE SEE FULL REPORT ATTACHED AS LETTER TO PD NAIDOO			
		tal Law Specialists on behalf of Elizabeth Parker, owner of			The statutory requirements & the identification & assessment of heritage informants was required to have been undertaken at the earliest possible stage of the project according to Section 38 of the National Heritage Resources Act, 25 of 1999 & section 2 of NEMA.(RW Summers) PLEASE SEE FULL REPORT ATTACHED AS LETTER TO PD NAIDOO			
		Elandsberg Farms & Nature Reserve			The scope of the HIA scoping study was limited to the identification, mitigation & management of heritage resources that are older than 60 years, prehistoric resources that are older than 100 years and paleontological resources that are older than 1000 years and not according to Section 2 of NHRA which defines heritage resource as "any place or object of cultural significance.(RW Summers) PLEASE SEE FULL REPORT ATTACHED AS LETTER TO PD NAIDOO			The HIA scoping report incorrectly states that the scope of work was limited to structures older than 60 years, archaeological and palaeontological resources. However, it is misleading to place too much emphasis on this statement as it is clear from the content of the HIA scoping report and its specialists studies that the scope of work was not limited in terms of the definition of heritage resources. The cultural landscape and historical built environment specialist study addressed a range of heritage resources including scenic routes, mountain backdrops, significant rural landscapes, historical townscapes, historical farmsteads, historical routes and passes, historical graveyards, VOC outposts, outspans, blockhouses. Furthermore the identification of heritage resources was undertaken at 2 scales, i.e. the broader landscape and individual site scale The findings of this study have been incorporated into the HIA scoping report including some 20 figures of mapped heritage resources within the study area (Baumann & Winter)

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment TIME COMMENTS

11/2						Eskom End of Jan 09 will be acceptable E Grunewald (Eskom)	S	pecialist Comments
No.	Name	Affiliation	Email	Contact No	Time	Eskom	EIA	HIA
1	John Veschini	ETLAC	rockyvalley@telk omsa.net		The time period given for comment should be extended to 30 January 2009, as it is inconveniently timed to coincide with the December Holiday	End of Jan 09 will be acceptable E Grunewald		
2	Niel de Jager	Chairman, Tulbagh Ratepayers & Inwoners Forum	acdejager@absa mail.co.za	023 230 0233	Request of an extension of time to the 30 Jan 09 for further consultations with lawyers			
3	Niki de Wolf	Owner of the historic Schoonderzi cht Farm & Moniki Chocolatier in Tulbagh	info@schoonderz icht.com	023 230 0673	Request an extension of at least a month for the public comments from the 12th Jan 09 due to not being able to download the HIA scoping report due to the size and the hard copy only delivered after Christmas			
4	Anel Powell	Senior Writer, Cape Times	anel.powell@inl.c o.za	021 488 4717	Will there be an extension of time?			
5	Joe de Villiers / Francis Swanepoel	I & AP	rondawel@lantic. net		Request an extension of time till 30 Jan 09			
6	Chris Wright		wright@wcaccess .co.za	022 448 1081	Not received official notification of the extension date of the 12th Jan 09, therefore request an extension of time for comments until end of Jan 09			

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment CONSULTATIONS COMMENTS

-3-13		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1						Specialist Comments	
No.	Name	Affiliation	Email	Contact No	Consultations	Eskom	EIA	HIA	
1	John Veschini	ETLAC	rockyvalley@telk omsa.net		Eskom has failed to adequately consult with the community that could be affected by the lines in terms of the laws governing an HIA application in terms of the act				
					centre of the of the valley of Tulbagh ,on the assumption that communities and I&AP's threatened by the preferred route nee	Most of the consultation process revolved around the North & North centre of the of the valley of Tulbagh ,on the assumption that only communities and I&AP's threatened by the preferred route need to be consulted and provided for in the HIA documentation whereas there is also communities on the south valley			
					Hardly anyone in the path of the preferred route who stand to be visually impacted by the powerlines in the Ceres, P A's Hamlet & Gydo Pass areas as well as southwards in the Riebeck valley even know of the intended power line, the route it will take, how high it will be & what it would look like, and no proper Critical Viewpoint has been provided to those communities. They are being denied the opportunity to comment in terms of the HIA application, as they were in terms of the EIA application.				
					Nobody in the Witzenberg Municipality apparently knew about the HIA application until I made them aware of it. They are major role players. Were they specifically invited to attend the presentation on the 24 Nov 2008? Where they on the I&AP's list? I believe not? Was everyone or every organisation who have appealed against the ROD invited as I & A Parties? I believe not?				
2	R.W Summers	Smith Ndlovu Summers Environmen tal Law Specialists on behalf of	rwsummers@law. co.za	021 424 5826	The public participation process was inadequate and not according to Section 38(3)(e) of the NHRA Section 2(4) of NEMA. SEE FULL REPORT ATTACHED AS LETTER TO PD NAIDOO				
		Elizabeth Parker, owner of Elandsberg Farms & Nature Reserve							
3	Chris Wright		wright@wcacces s.co.za	022 448 1081	The areas of Riebeek Valley & Gouda have not been informed about the public meetings	=			

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment ESKOM PLANNING COMMENTS

							Specialist Commen	ts
No.	Name	Affiliation	Email	Contact No	Consultations	Eskom	EIA	HIA
1	Esther A Jordan	Manley Wine Estate	esther@lando.co. za		I feel concern for the owners of Kloofzicht, Schalkenbosch & Schoongezicht etc and hope that most serious consideration will be given when deciding on the final route these pylons are expected to take.			
2	John Veschini	ETLAC	rockyvalley@telk omsa.net		The scoping documents refers to Critical Viewpoint Analysis, and yet no such analysis is evident in the data discs.			
					The Critical Viewpoint Analysis photos in the document are misleading to the public for two reasons: The viewpoint in respect to Gouda, Tulbagh, Wolseley, Ceres, P. A. Hamlet areas etc is taken from such a height so as to limit the real visual impact and also the power line structures depicted in the photographs do not appear to relate to the type & size of the intended power line structures & appear to rather be standard photos taken of 25m 400kv power lines such as those near Wolseley.			
					Eskom has used what I term "underhanded & bullying" tactics from day one of the EIA process. Officials telling farmers "you can sign the Servitude document as your neighbour has signed" when in fact it was not true, was one of the tactics.			
					The current route map has apparently deviated substantially towards Gouda from initial route maps provided by Eskom and in fact will now traverse a residential area. That community had not been consulted about the impact of the power line then & now with this HIA application either. Thus how can I & AP's in that area be determined in terms of tha HIA application?			
					Place the line underground for the long term benefit of this community, the public of South Africa & Eskom in terms of maintenance costs & risks to the line & this nightmare might goo away or atleast for the Tulbagh residents & those needing power soon as a result of the apparently atrocious forward planning by Eskom that we have all been made aware of.			
3	Niki de Wolf	Owner of the historic Schoonderzic ht Farm & Moniki Chocolatier in	info@schoonderz icht.com	023 230 0673	Eskom has assured us the power lines would not have any impact on Schoonderzicht Farm. We now know that the pylons are going to cross right over historic Steinthal who is our neighbor. Steinthal & Schoonderzicht will be impacted immensely			

						Sp	ecialist Commer	nts
No.	Name	Affiliation	Email	Contact No Consultations	Eskom	EIA	HIA	
•	George Mills	Tulbagh Chairman, Tulbagh Tourism	suarachas@yaho o.com	023 230 1756	I propose that an alternative route be utilised thereby removing (or atleast reducing) the adverse impact on Tulbagh's thriving industry. Alternatively a new Social & Environmental Impact Study must be carried in order to reassess the viability of the preferred route given how critically important Tourism has become to Tulbagh's community & its fragile economy since the initial findings of 2002.			
	R.W Summers	Smith Ndlovu Summers Environmenta I Law Specialists on behalf of Elizabeth Parker, owner of Elandsberg Farms & Nature Reserve	rwsummers@law. co.za	021 424 5826	The alternative route alignment for the 765kV transmission line utilised for the purposes of the HIA Scoping report fail to take into account the document entitled Report on Alternatives prepared by Eskom in 2004. In terms of the latter document, Eskom amended the original route alignments apparently in order to take into account concerns then raised by certain interested & affected parties in the Tulbagh valley. The final route identified by Eskom in the Report on Alternative as the preferred route differs markedly from the proposed alternative route alignments on the basis of the EIA process. SEE FULL REPORT ATTACHED AS LETTER TO PD NAIDOO			
	Anthony Silberg	Director, Tulbagh Heritage Agency	hotcom@telkoms a.net	023 230 0100	It is clear that the structure & the composition of the generation philosophy & plants needs to be set & agreed before transmission grid is developed The volatility in energy prices for fossil fuels is such that alternatives must be developed			
					If more nuclear alternative plants are developed at the coast there would be no need for expanding the transmission capacity	Even if new nuclear comes to W. Cape the line will be required to evacuate power to the inland, until then the line is required to transmit electricity to meet the growing demand in the W. Cape - E Grunewald (Eskom)		
					The one option would be to shelve to a 765 kV until a comprehensive energy plan is agreed			

						Spe	cialist Comments	
No.	Name	Affiliation	Email	Contact No	Consultations	Eskom	EIA	HIA
					At the presentation held at Morgansvlei we were assured that Eskom would develop nuclear generating plants in the Western Cape effectively doubling Koeberg's capacity to 3600 Mega watts. Yet barely two weeks later news reports intimated that Eskom was shelving the entire nuclear programme. This raises the question once again if Eskom has any idea at all of what it proposes.			
					It is no brainer that in view of the instability & fluctuations in the price of coal it is not rational & logical to put all your eggs in the fossil fuel generating basket. To only develop coal fired systems in Mpumalanga & then route power over 1500 km to the Western Cape indicates a severe lack of strategic planning competence. Furthermore there will be ongoing security problems to protect these lines from possible sabotage.			
					If however in spite of all the logical reasons Eskom still arrogantly continues to go ahead with the 765 KVA line it should follow the same route of the present 499KVA line. The reasons given for the need to divert the line through the Tulbagh are ill considered and feeble. It will be far simpler to overcome these problems & use the existing route			
7	Joe de Villiers / Francis Swanepoel	I & AP	rondawel@lantic. net		What is the possibility of putting the cables in a dark colored pipe running underground?	Underground cannot be financially accommodated and would also have a bigger visual impact because of the 2 x substations that would be required - E Grunewald (Eskom)		
8	Wendy Upcott		gwenrobin@mweb. co.za.	023 230 0893	Why can't the existing route through the valley be followed?			

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment DIGITAL PHOTOS COMMENTS

							Specialist Comments	
No.	Name	Affiliation	Email	Contact No	Consultations	Eskom	EIA	HIA
1	Esther A Jordan	Manley Wine Estate	esther@lando.co. za		Have a 3D perspective of the Tulbagh Valley with the proposed pylons superimposed in their positions so that we can have a better understanding of exactly were these pylons will be located & a view of how they will look			
2	John Veschini	ETLAC	rockyvalley@telk omsa.net		Requests to Eskom & its consultants to provide better photographs than those that were depicted in the mapping document placed in the local library (which were inadequate, hardly visible & doubted to be accurate depictions of the proposed powerline & the Tulbagh valley			
3	Niel de Jager	Chairman, Tulbagh Ratepayers & Inwoners Forum	acdejager@absa mail.co.za	023 230 0233	Although it has been requested on numerous occasions for us to have some indication as to what this power line would look like, either in the form of an artist's impression or computer generated images, we have had no reaction from Eskom or the consultants.			
4	Niki de Wolf	Owner of the historic Schoonderzic ht Farm & Moniki Chocolatier in Tulbagh	info@schoonderz icht.com	023 230 0673	I also want to make note of the fact that Eskom has not made any effort to show residents what the pylons will look like & where exactly they will be sited			

GAMMA OMEGA 765kV Transmission Line : Comments on the Heritage Impact Assessment OTHER COMMENTS

		THE PROPERTY OF	with the state	A STATE		Specialist Comments			
No.	Name	Affiliation	Email	Contact	Other	Eskom	EIA	HIA	
	John Veschini	ETLAC	rockyvalley@telkoms a.net		The Power Line project is of importance to all who will suffer from the sight as well as other negative impacts-not atleast probable health issues	Health is not an issue because the line is built to avoid this .E Grunewald (Eskom)	Dealt with it in the original EIA report		
					An airstrip that has been used for years by the farming community of the Tulbagh valley for their crop spraying needs and other negative visual cultural landscape have not been identified in the report	We would have to accommodate airstrips in finalising the alignment of the route E Grunewald (Eskom)	Dealt with it in the original EIA report		
	Niki de Wolf	Owner of the historic Schoonderzic ht Farm & Moniki Chocolatier in Tulbagh	info@schoonderzicht. com	023 230 0673	The EIA process which Eskom has followed so far has been inadequate and unfair				
3	George Mills	Chairman, Tulbagh Tourism	suarachas@yahoo.c om	023 230 1756	The Social & EIA carried out in 2002 was conducted at a time when tourism was far less important to Tulbagh's social & economic environment and way before the ROD at Schalkenbosch. In the past 5 years the local economy has been transformed by the growth o				
4	R.W Summers	Smith Ndlovu Summers Environmenta I Law Specialists on behalf of Elizabeth Parker, owner of Elandsberg Farms & Nature	rwsummers@law.co. za	021 424 5826	Failure to make hard copies of the HIA scoping report timeously available has made it difficult for the client to assess the contents of the report SEE FULL REPORT ATTACHED AS LETTER TO PD NAIDOO		Hard copies of all documents were provided to Eskom in plenty of time for public consultation - Tassie Clarke (VIA)		
,	Anel	Reserve Senior Writer,	anel.powell@inl.co.z	021 488	What is the estimated cost of the project & when will a decision be				
	Powell	Cape Times	<u>a</u>	4717	made on the proposed transmission line?	_			
6	John Haddad		john.haddad@pamgo lding.co.za	082 345 2258	What are the health implications on the population living nearby the powerlines and how far does one need to be to the lines for them to be a health risk?	The lines are constructed to have no health risk to any one - E Grunewald (Eskom)			
7	Christine Bond		No contact, no email (from the comment form)		How do you camouflage a 48m construction so that people will not see it?	The best camouflage for the towers is to leave the tower to oxidise, which then blends into background vegetation - E Grunewald (Eskom)			

SECTION N: POSITION STATEMENT

This position statement is derived from the reports submitted by the heritage specialists who worked on the project. It is a synthesis of their conclusions and is made available to the heritage authorities so that they can make an informed judgment about the nature, extent and impact that the Gamma-Omega Transmission Line will have on local, regional and national heritage resources in the Western and Northern Cape.

Transmission lines of various scales are a common feature across the South African landscape. They are also a feature of sections of the Swartland, Boland and Karoo landscapes of the Western Cape. However, they are limited in scale and have tended to merge into the landscape. A 700kV transmission is, however, a substantial infrastructural intervention, significantly larger than the 400kV transmission lines which currently traverse areas of the Western Cape. An infrastructural intervention of this scale and nature will alter to varying degrees the character of the landscapes which they traverse. They will also lead to cumulative impacts due to the fact that the alignment of an existing transmission line is likely to serve as the preferred alternative for any future upgrades thereof.

The preferred alignment of a transmission line across a landscape needs to take into account a range of issues, namely the acquisition of land, economic viability, geotechnical constraints, ecological constraints, potential social-economic impacts, health and safety requirements, visually sensitive areas, and cultural heritage constraints. However, it is only since the promulgation of the NHR Act in 1999 that cultural heritage issues have begun to be addressed. While the emphasis in heritage assessments has been on archaeological issues, the cultural landscape and historical built environment has been largely ignored. The heritage management measures for addressing impacts on archaeological and palaeontological resources are very different from addressing impacts on the cultural landscape and historical built environment. The latter cannot be easily mitigated due to the visual-spatial nature of such impacts, which can often only be minimised through substantial realignment.

The placement of transmission lines underground is not necessarily a suitable alternative for addressing visual impacts, especially within sensitive rural or natural landscape contexts. This alternative would require the construction of two substantial substations either end of an underground tunnel and would effectively sterilise the servitude for continuing agricultural purposes. The financial implications would be prohibitive.

The existing 400kV lines through the Western Cape traverse a diverse range of cultural landscapes and provide some important lessons with regard to the alignment of transmission lines from a cultural landscape and built environment perspective. In this regard, the broad expansive areas of the karoo appear to more easily accommodate infrastructural intrusions than the discrete valley systems contained within the Mountain Region or the sensitive mountain slope conditions of the Swartland, especially where there is no evidence of previous infrastructural interventions. On the other hand, there are rural and wilderness landscapes of special heritage significance in terms of their intactness, representivity and integrity, which are worthy of being considered formal protection as local, provincial and national heritage resources. Increasingly these

landscapes are under pressure from amenity seeking development which threatens to destroy the very qualities which make them so special. Large scale infrastructural developments across these few remaining intact landscapes must be avoided, not only from heritage perspective but also because of a potential loss to the economic base of these landscapes through impacts on their cultural tourism.

In terms of generally accepted HIA practice, which has been endorsed in terms of DEA&DP's Guidelines for Involving Heritage Specialists in EIA processes, heritage specialist input should occur at the earliest possible stage in the project cycle in order to guide and add value to the proposed project and to identify major heritage issues or potential fatal flaws. Heritage specialist input in this project has occurred at a very late stage in the project cycle, which has limited its capacity to be proactive rather than reactive to a number of predetermined route alternatives. Despite this limitation, it has not precluded, as part of a scoping phase in the heritage assessment process, the alternatives or sections thereof being considered as no-go options and thus requiring substantial modification through realignment.

In this regard, there are sections of both the primary route alternatives, which are highly problematic from a cultural landscape and historical built environment perspective in terms of their potential **high to medium high heritage impacts**. These are located within the Swartland and Mountain Regions extending from Oliphantskop to Theronsberg Pass which constitute approximately 112km or 20% of the entire study corridor. Realignment of both these alternatives would be required in order to adequately mitigate their impacts. It is thus recommended that this section of the study corridor be subject to further assessment, including the selection of more suitable alternative alignments from a cultural landscape and historical built environment perspective. This should preferably occur in terms of an integrated environmental assessment process.

Within approximately 458km or 80% of the study corridor through extensive Karoo landscapes, potential heritage impacts on the cultural landscape will be of a **low to medium level**. The mitigation of these impacts could be accommodated through minor adjustments to the alignment and also detailed measures at a site specific level. Consideration should thus be given to the conditional endorsement of this major section of the study corridor in order that detailed planning including the satisfaction of EMP requirements can proceed without unnecessary delay.

From a palaeontological and archaeological perspective the potential impact on fossil remains and cultural material is of a **high to medium level** however the ultimate selection of routes is immaterial. Unlike built environment resources lend themselves well to mitigation of impacts in the form of collection and removal from there original position, for the purpose of research and curation. The professional mapping and collection of these resources which would in to contribute to an understanding of both the natural and cultural environment in the Westen and NorthernCape. It is therefore recommended that a second phase of investigation, at field sampling level be implemented.

Mary Patrick, Sarah Winter & Nicolas Baumann Cape Town, March 2009

UNDERLINE

SECTION O: PROJECT REFERENCES

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M4/1211	1900	Magisterial District: Victoria West

SAHRA

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SECTION P: APPENDICES

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for Cultural Resource Management (December 2001)

Appendix 2: HWC letter of comment (June 2007)

Appendix 3: Minister of DEAT letter (September 2008)

Appendix 4: Project Photographic Record Built Environment

Appendix 5: Evolution of the Historical Landscape

Appendix 6: Public Consultation (2002-2009)

Appendix 1

Appendix 1

GAMMA-OMEGA 765 Kv TRANSMISSION LINE

Heritage Management Plan

Prepared By:

The Agency for Cultural Resource Management Specialists in Archaeological Studies and Heritage Resource Management

On Behalf Of:

PD Naidoo & Associates

&

Pba International Ltd

December 2001

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1.0 INTRODUCTION

1.1 Background

PD Naidoo & Associates and Pba International, requested the Agency for Cultural Resource Management to undertake a heritage review of the proposed Eskom Transmission Gamma-Omega 765kV Transmission Line between the proposed Gamma (Victoria West) and Omega substation (Koeberg) sites, as a basis for the Environmental Management Plan for the project.

Known as the Cape Strengthening Programme, the proposed project includes a range of services that will improve the reliability of electricity supply to the Western Cape.

The aim of the study was to assess the potential impact that the proposed 765kV-Transmission line will have on archaeological, palaeontological and historical sites along the proposed routes.

2.0 TERMS OF REFERENCE

The terms of reference for the heritage review were:

- to identify sites of archaeological, palaeontological and cultural status in the study area;
- 2. to assess the likelihood of sensitive sites in the study area; and
- to identify measures to protect from construction damage any valuable archaeological, palaeontological and cultural sites that may exist in the proposed powerline route.

3.0 CONSTRAINTS ASSUMPTIONS AND LIMITATIONS

The following constraints, assumptions and limitations apply to the heritage review.

- The review was severely constrained by a limited field study, which allowed only a cursory assessment of the proposed routes.
- The field study focused only on the archaeological status of the proposed routes, and to a limited extent on the historical status of the proposed routes.

 Information on the palaeontological (fossil) status of the proposed routes was obtained from Dr Roger Smith of the Department of Karoo Palaeontology at the South African Museum (Cape Town) and from Dr Dave Roberts of the Council for Geoscience (Cape Town) and it is assumed that this information is correct.

4.0 OPPORTUNITIES AND BENEFITS

The proposed Eskom Transmission Gamma-Omega 765kV project presents considerable opportunities and benefits for heritage specialists. These include:

- the opportunity to identify and record previously unknown heritage sites.
- the opportunity to identify mitigatory measures to protect and maintain any valuable archaeological, palaeontological and historical sites that may exist in the proposed routes.

5.0 THE STUDY AREA

The study area for the project is illustrated in Map 5a.

Four routes are proposed. These include:

- the Central Route: this being the total route from the proposed Gamma substation to the proposed Omega substation, including the proposed new route over the Agter Witsenberg area;
- the Central Alternative: this being the short section through the Agter Witsenberg area;
- the Northern Alternative: this being the section deviating to the north in Section 3 and joining at the Gydo Pass; and
- the Southern Alternative: this being the section following the existing 400 Kv lines past Ceres and Wolsley.

6.0 STUDY APPROACH

6.1 Method

In order to address the objectives of the heritage review, the following method has been followed:

- a 4-day site assessment of the proposed routes.
- a desk top review.
- consultation with specialists.

7.0 LEGISLATION

Archaeological and palaeontological sites, graves/cemeteries, battlefield sites, and buildings, structures and features over 60 years old, are protected under the National Heritage Resources Act (No. 25 of 1999).

According to the Act, it is an offence to destroy, damage, excavate, alter of remove from its original place, or collect, any archaeological, palaeontological and historical material or object, without a permit issued by the South African Heritage Resources Agency (SAHRA).

8.0 RESULTS OF THE FIELD REVIEW AND DESK TOP STUDY

8.1 Archaeological sites

28 location sites in Sections 1-5 of the proposed routes were visited and searched for archaeological remains.

8.1.1 Section 1

Four locations were searched in Section 1.

No archaeological remains were located, but relatively large numbers of Middle Stone Age¹ (MSA) and Early Stone Age² (ESA) artefacts have been found during a number of heritage impact assessments undertaken in the Swartland and Berg River region (Hart 1987; Kaplan 1988, 1999, 2000a,b, 2001a,b,c,d).

¹ A term referring to the period between 200 000 and 20 000 years ago.

² A term referring to the period between 2 million and 20 000 years ago.

Two Later Stone Age³ (LSA) sites occur on the farm Groot Oliphantskop, the site of the proposed Gamma substation (Kaplan 1996). Two Khoisan skeletons were also excavated from a large sand dune on the farm about 50 years ago (Kaplan 1996).

Large parts of Section 1 are currently heavily farmed, resulting in low archaeological visibility.

Voelvlei and Driebos Shelters (between the Central Route and the Southern Alternative), are located in the Voelvlei Mountains overlooking Voelvlei Dam. The upper levels of Voelvlei Shelter are radiocarbon dated to between 300 and 400 years ago (Smith <u>et al</u> 1991) and a dating to the early period of European contact was confirmed by the finding of a glass bead, a lump of lead, a fragment of an iron nail and a copper bead.

8.1.2 Section 2

Four locations were searched in Section 2, including one in the Central Alternative.

Bushman rock paintings are well known in the Koue Bokkeveld region of Section 2, particularly those depicting colonial imagery (Johnson et al 1959; Yates et al 1993). The Koue Bokkeveld was unusual in terms of early Cape history, in that unlike many other areas from which the Khoisan quickly disappeared, there was sustained contact in the region between remnants of the Khoisan and colonists throughout the eighteenth century (Penn 1987).

No archaeological remains were located during the Section 2 field review.

8.1.3 Section 3

Six locations were searched in Section 3. These included the farms Lower Stinkfontein, Platfontein and four unknown farms along the proposed Central Route.

Relatively large numbers of MSA tools, and some LSA tools were found on the farm Lower Springfontein. A few MSA few tools were located on the farm Platfontein.

The proposed Northern Alternative was not searched for archaeological remains.

No detailed archaeological studies have been undertaken in the Section 3 study area.

³ A term referring to the last 20 000 years of precolonial history in southern Africa.

8.1.4 Section 4

Five locations were searched in Section 4. These included the farms Klipfontein, Swaerskraal, Spitzkop, Fortuin and Bon Espirange. A few MSA tools were located on the farms Swaerkraal and Fortuin.

No detailed studies have been undertaken is this area (David Morris McGregor Museum, Kimberley, pers. comm.).

8.1.5 Section 5

Nine locations were searched in Section 5. These included the farms Gabriels Baken, Phaisant Kraal, Tyboschfontein, Montana, Steenrotsfontein, La-De-Da, Vindragersfontein, Buffels Valley and Rietpoort.

Archaeological remains were located at four of the nine sites visited; at Phaisant Kraal, Steenrotsfontein, La-De-Da, and Buffels Valley. These included a handful of mainly MSA and some ESA tools, but a discreet, low density scatter of LSA tools and some ostrich eggshell were located on the farm La-De-Da.

According to David Morris of the McGregor Museum in Kimberley (pers. comm.), no heritage impact assessments have been undertaken in Sections 5 or 4 of the study area. But other studies have shown that scatters of stone tools are abundant around Victoria West and in the Upper Karoo and the Orange River Scheme (Goodwin & Van Riet Louw 1926; Jansen 1926; Humphreys 1979; Sampson 1972, 1984).

The Karoo in Sections 4 and 5 rocks are shot through by dolerite dykes, where the raw material hornfels/indurated shale is ubiquitous and superabundant and an excellent source for making stone tools (Parkington 1984).

Bushman rock paintings and rock engravings have also been recorded at Pampoempoort near Victoria West and in the Karoo National Park (Morris pers. comm.).

8.2 Palaeontological sites

According to Dr Roger Smith of the Department of Karoo Palaeontology at the South African Museum in Cape Town, Sections 2-5 in the study area all fall within sensitive fossil bearing deposits.

8.2.1 Section 1

According to Dr Dave Roberts of the Council for Geoscience in Cape Town, Section 1 comprises the Malmesbury Group of deposits. Body fossils of Malmesbury age are known from elsewhere (e.g. Namibia), but the geological setting (deep water turbodites) of Section 1 is highly unfavourable for body or plant fossils. No fossils of any sort have yet been found in the Malmesbury Group (Roberts pers. comm.).

8.2.2 Section 2

Section 2 falls within the Bokkeveld Formation, which is an extremely sensitive area for invertebrate fossils dating to about 380-410 million years ago. Extensive outcroppings in Ceres, Gydo Pass and Tulbach have produced rich fossil remains (Smith pers. comm.).

8.2.3 Section 3 and 4

Section 3 and 4 falls in the Whitehill and Ecca Group of deposits respectively, which are rich fish and plant fossil-bearing deposits. Extensive outcroppings of these deposits occur around the Matjiesfontein and the De Doorns area, but extending further inland too, toward Sutherland and Komsberg (Smith pers. comm.).

8.2.4 Section 5

Section 5 is located in the Karoo Supergroup, made up primarily of sandstones and shale (known as the Beaufort Group). The area around Beaufort West for example, is the richest collecting ground for mammal and reptile-like fossils (or Karoo vertebrates) in the world. The fossils found in this area are approximately 250 million years old.

The upper escarpment, kopjes, ancient river valleys and washouts, are all sensitive areas and considered to be highly collectable fossil sites (Smith pers. comm.).

Fossils have been found on a number of farms in the study area, including Rietfontein, Waaikraal, Kuilspoort, La-De-Da and Spitskop. Vindragersfontein is a well-known locality where extensive collections have been done (Smith pers.

comm.). The Karoo National Park outside Beaufort West is also well known for its rich diversity of fossils

8.3 Historical sites

Historical sites refer to buildings, graves, cemeteries, built structures and features in the landscape which have historical significance.

8.3.1 Section 1

The Groot Oliphantskop homestead is located on the site of the proposed Gamma substation (Kaplan 1996). Built with 'opgekleide' walls, possibly around the late eighteenth or early nineteenth century, the farmhouse currently retains a T-form shape, but was originally L-shaped or even straight. Also of interest is a building behind the main house with riet ceilings, reputed to be older than the main house. (Kaplan 1996).

Despite being altered both internally and externally over time, the farm complex is considered conservation worthy (David Hart, South African Heritage Resources Agency, pers. comm.).

Additional historical features on the farm include two stone lined wells and an old cemetery.

The Mamre Road also passes through the farm, and although not a declared national monument, has been declared conservation-worthy by the South African Heritage Resources Agency (Hart pers. comm.).

According to the addendum to the Gamma-Omega draft scoping report (2001:34-35) the old transport route over the Porseleinberg may be impacted by the proposed Central Route. No evidence of the route was noted during the field study, and the route has most likely been destroyed by farming and related activities.

The Central Route also passes over a dilapidated Cape Dutch thatched-roof farmhouse on the farm Koomandsdrif on the Porseleinberg Road.

The proposed Central Route in Section 1 passes south of nearby Sonquasdrift, a ford across the Berg River that was used by the Dutch as was one of the routes used to gain access to the mountains and the Tulbach valley to the east. It remained an important Dutch outpost in the eighteenth century (Deacon 1993). In May 1701, it was attacked by the Ubiqua Khoikhoi who drove away most of the Dutch cattle (Smith et al 1991).

Bushmans Rock near Gouda is a prominent flat topped sandstone outcrop situated alongside the railway line (in the Central Route). It is here, at the entrance to Tulbach Kloof, in 1738, that the head and right hand of Ettienne Barbier, a Dutch renegade, was staked on a pole, as a warning to offenders, not to undermine the authority of Cape Dutch rule (Mossop n.d.).

The Southern Alternative in Section 1 will very likely impact on the 'sense of place' of the historic farm Bartholomeus Klip. The earliest buildings on the farm, including the Cape Dutch homestead known as Bosplaas, date to around the 1700's. The outbuildings on the farm, which include the stone built sheds and storerooms, were constructed around the 1800's. According to farm manager, Mike Gregor (pers. comm.), visitors to the guest farm already comment on the unsightly feature of the existing 400 Kv Transmission line.

8.3.2 Section 2

The farm Elandsfontein on the Op Die Berg-Citrusdal road, occurs in the proposed Northern Alternative. The farm complex may be significant, and a number of buildings, including the homestead, have been renovated and restored.

Sensitive historical sites were also visited at Steinthal and Slagterspad (Tulbach) in the Central Alternative and Central Route respectively.

The Steinthal mission settlement was established for freed Cape slaves in 1843 (Dominee Dreyer, pers. comm.). It has the customary thatched and whitewashed cottages, several of which are in bad condition. Most of the buildings were destroyed in the earthquake of 1969 (Fransen and Cooke 1980). The remaining building (currently the community library) was declared a national monument in 1999.

The addendum to the Gamma-Omega draft scoping report (2001:34-35) reports that there are historically sensitive sites in the Agter Witsenberg mountains, including a VOC canon (dated \pm 1734), and the remains of a British fort. According to Dominee Dreyer (pers. comm.), the old wagon trail to Wuppertal is also located in the mountains behind Steinthal.

In 1658, Sergeant Jan van Harwarden led an expedition on behalf of Jan van Riebeek to find a way through the mountains in order to access the fabled gold fields of Monomotapa. Thus Slagterspad (or Oude Kloof) between Gouda and Tulbach was built, and is reputed to be one of the oldest mountain passes in the country (Mossop n.d).

8.3.3 Section 3

The Karoopoort Outspan (declared a national monument in 1981), is located alongside the Southern Alternative on the R46. The outspan, comprising a werf wall enclosing two buildings (a thatched roof langhuis and a large rectangular outhouse with tin roof), was used by early travellers to the north and was described by Burchell (1822).

8.3.4 Section 4 and 5

No known historical sites occur in the proposed Central route (David Morris, McGregor Museum, Kimberley, pers. comm.). Unknown South African Anglo-Boer war graves may, however, occur in the study area.

9.0 'RED FLAG' AND 'NO GO' AREAS

A sensitivity map for cultural heritage resources is illustrated in Map 5.

9.1 Archaeology

9.1.1 Section 1

The Porseleinberg is regarded as a Moderate to High 'Red Flag' area.

9.1.2 Section 2

The Bokkeveld, Agter Witsenberg and Ceres mountains are regarded as Moderate to High 'Red Flag' areas.

9.1.3 Section 3

The low-lying mountains on the western boundary of Section 3 are regarded as a Moderate 'Red Flag' area.

9.1.4 Section 4

The Komsberg and Moordernaars Karoo are regarded as a Moderate to High 'Red Flag' area.

9.1.5 Section 5

The mountainous areas of the Great Karoo are regarded as a Moderate to High 'Red Flag' area.

9.2 Palaeontology

9.2.1 Section 1

No 'Red Flag' or 'No Go' areas occur in Section 1 (Dave Roberts pers comm.).

9.2.2 Section 2

Section 2 is regarded as a Moderate to High 'Red Flag' area (Roger Smith, pers. comm.).

9.2.3 Section 3

Section 3 is regarded as a Moderate to High 'Red Flag' area (Roger Smith, pers. comm.).

9.2.4 Section 4

Section 4 is regarded as a Moderate to High 'Red Flag' area (Roger Smith, pers. comm.).

9.2.5 Section 5

Section 5 is regarded as a Moderate to High `Red Flag' area (Roger Smith, pers. comm.).

9.3 Historical

9.3.1 Section 1

Groot Oliphantskop, Koomandsdrif, Bartholomeus Klip and Bushmans Rock are all regarded as Moderate to High 'Red Flag' areas.

9.3.2 Section 2

Slagterspad/Oude Kloof, Steinthal, the Agter Witsenberg, and the Ceres Mountains, are regarded as Moderate to High `Red Flag' areas.

9.3.3 Section 3

The Karoopoort Outspan is regarded as a 'Red Flag' area.

9.3.4 Section 4

No 'Red Flag' or 'No Go' areas occur in Section 4.

9.3.5 Section 5

No 'Red Flag' or 'No Go' areas occur in Section 5.

10.0 IMPACT DESCRIPTION AND ASSESSMENT

A summary of the significance of the archaeological, palaeontological and historical impacts is presented in Tables $\underline{1,2}$ and $\underline{3}$.

Impact assessment descriptions of the archaeological, palaeontological and historical impacts are presented in Tables 4-30.

10.1 Section 1

Archaeology - other than the Porseleinberg, the potential impacts in Section 1 are regarded as Low.

Palaeontology - the potential impacts in Section 1 are regarded as Low.

Historical - other than the farms Groot Oliphantskop and Koomandsdrif, and Bushmans Rock and Slagterspad/Oude Kloof in the Central Route, and Bartholomeus Klip farm in the Southern Alternative, the potential impacts in Section 1 are regarded as Low.

10.2 Section 2

Archaeology - the potential impacts in Section 2 are regarded as High-Medium.

Palaeontology - the potential impacts in Section 2 are regarded as High

Historical - the potential impacts in Section 2 are regarded as High-Medium.

10.3 Section 3

Archaeology - the potential impacts in Section 3 are regarded as High-Low.

Palaeontology - the potential impacts in Section 3 are regarded as High.

Historical - other than the Karoopoort Outspan in the Southern Alternative, the potential impacts in Section 3 are regarded as Low.

10.4 Section 4

Archaeology - the potential impacts in Section 4 are regarded as High-Low.

Palaeontology - the potential impacts in Section 4 are regarded as High.

Historical - the potential impacts in Section 4 are regarded as Low.

10.5 Section 5

Archaeology - The potential impacts in Section 5 are regarded as High-Low.

Palaeontology - The potential impacts in Section 5 are regarded as High.

Historical - The potential impacts in Section 5 are regarded as Low.

11.0 RECOMMENDED MANAGEMENT ACTIONS

With regard to the archaeological heritage, the following management actions, to be included in the Environment Management Plan, are required.

- The tower positions in Sections 2-5 should be checked by a professional archaeologist.
- All proposed new access roads in Sections 2-5 should be checked by a professional archaeologist.
- All proposed borrow pits and quarries should be checked for archaeological remains.
- Methods of mitigation could also be determined following pegging of the final route and discussion with the Environmental Control Officer (ECO).
- 5. A full-time Environmental Control Officer (ECO) is required along the route alignment during vegetation clearing.
- The ECO is to be briefed by a professional archaeologist what to look out for, particularly during bush clearing.
- 7. Contractors, staff and plant operators should also be briefed what to look out for, particularly during bush clearing and the construction phase of the project.

- Heritage remains uncovered or disturbed during bush clearing and earthworks should not be disturbed until inspected by the ECO and a professional archaeologist.
- Heritage remains should be verified by the ECO during the course of bush clearing.
- 10. Should any human remains be disturbed, exposed or uncovered during earthworks, these should immediately be reported to the consultant archaeologist, or the office of the South African Heritage Resources Agency (SAHRA) in Cape Town. Contact Mrs Mary Leslie on (021) 462 4502.

Burial remains should be treated sensitively at all times. Human remains should not be removed until inspected by a professional archaeologist.

With regard to the palaeontological heritage, the following management actions, to be included in the Environment Management Plan, are required.

- A pre-digging survey of the preferred route, all proposed new access roads and tower site locations, in Sections 2-5, is required.
- All excavation trenches/cuttings, borrow pits and quarries in Sections 2-5 are to be inspected for fossil remains.
- Dr Roger Smith of the Department of Karoo Palaeontology at the South African Museum in Cape Town (021 424 3330) should be consulted further with regard to the potential palaeontological impacts arising out of the proposed project.
- Methods of mitigation could also be determined following pegging of the final route and discussion with the Environmental Control Officer.

With regard to the historical heritage, the following management actions, to be included in the Environment Management Plan, are required.

 Mr David Hart, Acting Regional Manager of SAHRA, is to be consulted with regard to potential impacts arising out of the proposed project.

These include possible impacts on the 'sense of place' on the farms Groot Oliphantskop, Koomandsdrif and Bartholomeus Klip in Section 1, Elandsfontein and Steinthal in Section 2, and the Karoopoort Outspan in Section 3.

Mr Hart can be contacted on (021) 462 4502.

2. Additional methods of mitigation can be determined following the planning and design of the preferred route.

The above recommendations are subject to approval of the South African Heritage Resources Agency.

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Appendix 2

Appendix 2



Enquiries: Ndukuyakhe Ndlovu

Tel: 021 483 9685

Email: nndlovu@pgwc.gov.za

Cape Town, 06 June 2007

Mr. Ernest Grunewald Senior Consultant: Land & Rights Eskom Transmission P.O. Box 1091 Johannesburg Ernest.Grunewald@eskom.co.za

Dear Mr. Grunewald,

Re: PROPOSED CONSTRUCTION OF A 765KV ESKOM TRANSMISSION POWER LINE BETWEEN THE PROPOSED GAMMA (VICTORIA WEST) AND OMEGA (KOEBERG) SUBSTATIONS

Our telephonic discussion on 22^{nd} of May 2007, an e-mail of the same date, the subsequent meeting we had at our offices in Cape Town (29 May 2007), together with the archaeologist for the project, Mr. J. Kaplan and the second e-mail you sent on the 30^{th} of May 2007 refers.

Heritage Western Cape (HWC) is the Provincial Heritage Resources Authority, established in terms of the National Heritage Resources Act (Act 25 of 1999) in January 2003. HWC, as a public entity, is mandated to promote co-operative governance between national, provincial and local authorities for the identification, conservation and management of heritage resources. On the basis of its jurisdiction, HWC notes the following:

- The Department of Environmental Affairs and Tourism issued a Record of Decision (ROD) on 12 June 2006. This ROD [Ref: 12/2/20/99/10 (A24/16/3/190/10)] was based on the following:
 - a. The Environmental Impact Report (EIR) of March 2002, which included various specialists' reports, i.e. Heritage Management Plan.
 - b. The proposed powerline, about 550kms in length, is intended to provide to meet the electricity demands of South Africa, which has had various challenges regarding the provision of electricity.
 - c. The Gamma-Omega 765kV transmission powerline is a major component of the Cape Strengthening Programme being undertaken by Eskom Transmission. It is aimed at improving the reliability of the existing network and to upgrade the capacity of the network to the Western Cape to meet the increased demand for reliable supply of electricity.
- 2. Within the 30-day appeal period, a total of about 61 appeals were received. Some of the appeals were based on the fact that there were concerns with the inadequate heritage assessment done for the proposed powerline.
- 3. Eskom Transmission had earlier engaged Mr. J. Kaplan of the Agency for Cultural Resource Management (ACRM) to assess the potential heritage impacts of the proposed powerline. In return, he produced a document titled Heritage Management Plan. This report was not adequate on the basis of some the following reasons:

www.capegateway.gov.za/culture_sport

- a. Review of the proposed routes was severely constrained, and therefore, only a cursory assessment was undertaken. No reasons are given for such constraint. The heritage assessment only took four days.
- b. Major focus was on the archaeological heritage, and only to a less extent about historical, built environment and palaeontological resources.
- c. The decision to select particular locations within various sections was not clearly indicated. It is therefore difficult, if not impossible, to assess whether the study covered all the various potential impacts on heritage resources.
- d. The route assessed, even though the assessment was not adequate, provides an indication that archaeological, historical and palaeontological heritage would be affected in one way or the other. Detailed mitigation measures are not provided.
- 4. South African Heritage Resources Agency (SAHRA) was approached for comment on the proposed powerline from 2001. Details supplied by Eskom Transmission to HWC clearly indicate that there were a number of communication exchanges between the consultants (PD Naidoo & Associates) and SAHRA.
 - a. On the 2nd of August 2001, SAHRA requested a Phase 1 Archaeological Impact Assessment (AIA) and provided a description of what this study should entails when they were requested to define what the Phase 1 AIA means
 - b. On the 3rd of April 2002, SAHRA commented further:
 - i. "Given the magnitude of this project, and the potential of such a powerline to severely negatively impact the heritage value of its surrounding area, it is requested that a recognised heritage practitioner form part of the team dealing with the EIA. The heritage issues that need to be addressed involve issues ranging from archaeology, palaeontology, the built environment, the cultural landscape, visual impacts, sense of place, scenic routes as well as possible issues around cultural or spiritual association".

It seems that by this time (3rd of April 2002), Eskom Transmission had already commissioned Mr. J. Kaplan to produce the Heritage Management Plan, which is dated December 2001.

c. There seems to have been no final comment made by SAHRA on the application, after reviewing the Heritage Management Plan. This is an indication that Eskom Transmission fulfilled the requirements of the law as far as heritage resources are concerned, by consulting with SAHRA, in the absence of the Provincial Heritage Resources Authority (PHRA) – in this case HWC that only came into existence in 2003. It should be noted that this was during the lacuna period, whereby SAHRA could not comment.

From the above information, HWC comments as follows:

- A detailed Heritage Impact Assessment (HIA) would have to be undertaken. This
 HOA should discuss heritage ranging archaeology, palaeontology, the built
 environment, the cultural landscape, visual impacts, sense of place, scenic routes as
 well as possible issues around cultural or spiritual association, as initially requested
 by SAHRA in 2002.
- Included in the HIA, a palaeontologist must provide a Palaeontological Impact
 Assessment (PIA) only desktop study, of the powerline route. The Phase 1 AIA to
 assess archaeological impacts must also be part of the HIA.
- 3. The compiled HIA must be submitted to HWC for comment.
- 4. The HIA should use the Heritage Management Plan compiled by Mr. Kaplan as the benchmark.
- A Virtual Impact Assessment (VIA) was undertaken during the previous EIA process, which the current ROD was based. The HIA should assess the validity of this VIA,

- considering the changes to the route that have been made since the study was carried out. If it is deemed to be still adequate, then it must be submitted to HWC together with the HIA.
- 6. HWC supports a conditional ROD, rather than a suspension of the current ROD dated 12 June 2006. The conditional ROD must indicate that Eskom should re-assess the potential heritage impacts of the Gamma-Omega powerline by compiling the HIA. Such assessment should form part of the Environmental Management Plan (EMP). The EMP will then have to be approved by DEAT, in consultation with HWC, before construction of the line can commence.

Please do not hesitate to contact me if you have any enquiries with regards to the above.

Yours faithfully,

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Ndukuyakhe Ndlovu

Senior Heritage Officer: Archaeologist

Cc: JC Agenbach, DEAT, cagenbach@deat.gov.za; Fax: 012 320 7539

Mmamoloko Seabe, Land & Rights Manager (Eskom), Jeanette.Seabe@eskom.co.za

Appendix 3



for Manyer Moto)

MINISTRY: ENVIRONMENTAL AFFAIRS AND TOURISM REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Tel: (+27 12) 310 3611, Fax: (+27 12) 322 0082 Private Bag X9154, Cape Town, 8000, Tel: (+27 21) 465 7240/1/2, Fax: (+27 21) 465 3216 website: www.deat.gov.za

Ref: MC14523

Ms E Johnson Acting Managing Director: Transmission P O Box 1091 **JOHANNESBURG** 2000

Dear Ms Johnson

GAMMA-OMEGA 765kV TRANSMISSION LINE: HERITAGE ASSESSMENT

I refer to the above matter and thank you for your letter dated 28 May 2007.

I have noted your efforts to secure an agreement with Heritage Western Cape (HWC) on a possible way to meet the heritage assessment requirements for this transmission line.

I have thoroughly considered your proposal that a record of decision (ROD) be issued for the project on the condition that the heritage impact assessment (HIA) should form part of the environmental management plan (EMP) and that construction of the line can only commence after approval of the EMP by the Department and HWC. However, I am concerned that such an approach may be construed as pre-empting the HIA which, in tum, may have certain obvious consequences.

I am of the view that the HIA must be made available to the Appellants that have expressed their concerns in this regard and that they should also be given an opportunity to comment on the report. Thereafter, the completed HIA, including a full report on the consultative process must be submitted to me.

In the circumstances, I am of the opinion that the requirements stated above must be addressed before I can make a decision on the appeal and trust that this process will be expedited.

Kind regards

MARTHINUS VAN SCHALKWYK, MP

MINISTER OF ENVIRONMENTAL AFFAIRS AND TOURISM

Marthaus van Schallay

Appendix 4

APPENDIX 4: PHOTOGRAPHIC SURVEY

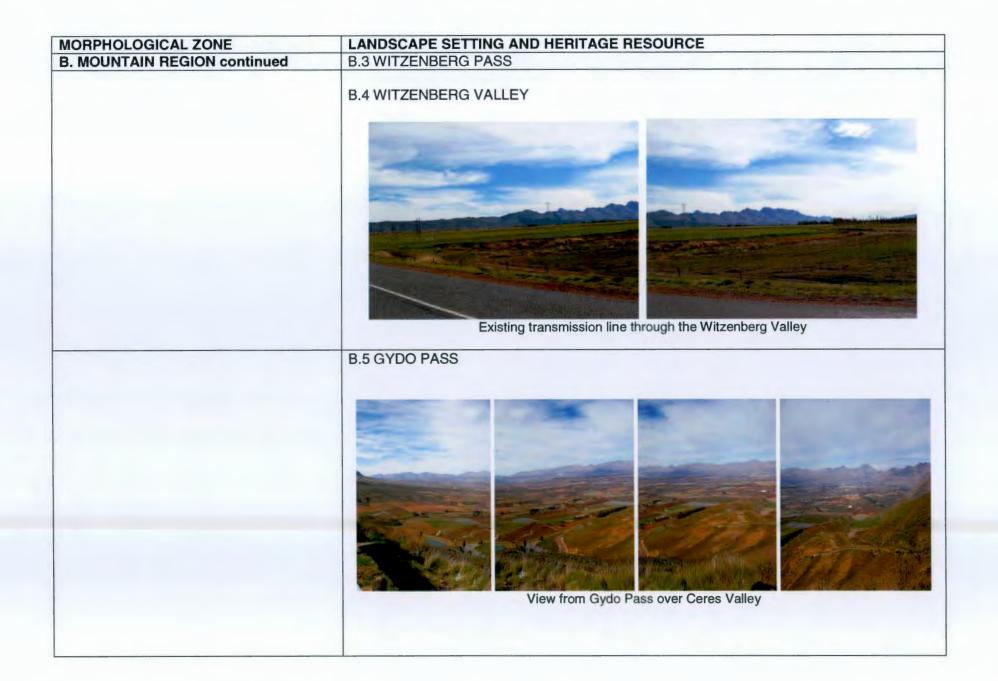
MORPHOLOGICAL ZONE	LANDSCAPE SETTING AND HERITAGE RESOURCE
A. SWARTLAND	
	A.1 GROOT OLIPHANTSKOP
	A.2 KOEBERG Botterberg homestead Philadelphia town
Undulating topography typical of Swartland	View of Swellengift from old Cape Road Distant views of Table Mt along Old Cape Road

MORPHOLOGICAL ZONE LANDSCAPE SETTING AND HERITAGE RESOURCE A. SWARTLAND continued A.3 PAARDEBERG SLOPES Existing transmission line crossing the R302 with Paardeberg in background Views along the R302 towards Paardeberg A.4. MALMESBURY FOOTHILLS View from the R46 towards Malmesbury foothills A.5 KASTEELBERG-PORSELEIN BERG

LANDSCAPE SETTING AND HERITAGE RESOURCE MORPHOLOGICAL ZONE A. SWARTLAND continued A.6 BOTMASKOOF PASS View across Malmesbury Foothills from base View across Berg River Valley from base of Botmaskloof Pass of Botmaskloof Pass A.7 BERG RIVER CORRIDOR Bosplaas homestead Klein Eikeboom homestead Eikeboom outbuilding A.8 ELANDSKLOOF-BARTHOLOMEUSKLIP Bosplaas Nature Reserve Bosplaas homestead (front) Bosplaas homestead (rear) A.9 ELANDSKLOOF PASS

LANDSCAPE SETTING AND HERITAGE RESOURCE MORPHOLOGICAL ZONE A.10 NUWEKLOOF PASS A. SWARTLAND continued Base of the Nuwekloof Pass at entrance to Tulbagh Valley Nuwekloof Pass **B. MOUNTAIN REGION B.1 TULBAGH VALLEY** View from western approach road to Tulbagh showing approximate location of proposed transmission line

MORPHOLOGICAL ZONE LANDSCAPE SETTING AND HERITAGE RESOURCE **B. MOUNTAIN REGION continued B.1. TULBAGH VALLEY continued** View from eastern approach road to Tulbagh showing approximate location Witzenberg backdrop to Tulbagh Valley of proposed transmission line **B.2 WOLSELEY VALLEY** Existing transmission line through the Wolsley Valley



MORPHOLOGICAL ZONE LANDSCAPE SETTING AND HERITAGE RESOURCE B.5. GYDO PASS continued **B. MOUNTAIN REGION continued** Top of the Gydo Pass showing approximate location of proposed transmission line **B.6. GYDO VALLEY** Views of the Gydo Valley and approximate location of proposed transmission line

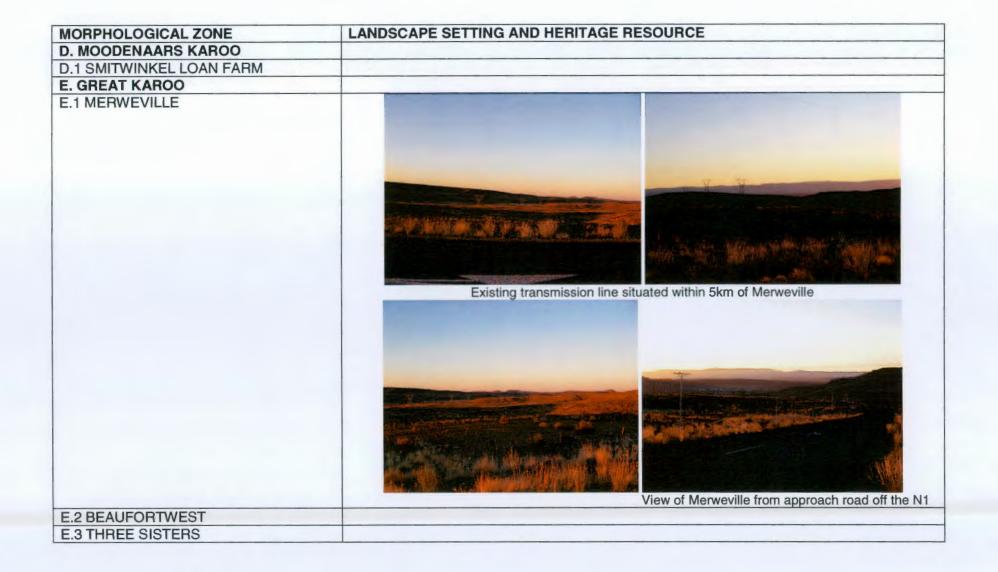
MORPHOLOGICAL ZONE	LANDSCAPE SETTING AND HERITAGE RESOURCE	
B. MOUNTAIN REGION continued	B.7. CERES FARMLAND	
	View from the R303 showing approximate location of proposed transmission line through Ceres Farmlands	Existing transmission line through Bella Vista

MORPHOLOGICAL ZONE	LANDSCAPE SETTING AND HERITAGE RESOURCE
B. MOUNTAIN REGION continued	B.8 THERONSPASS
	Existing transmission line parallel to Therons Pass
B.9 HOTTENOTSKLOOFPASS	
	Historical building at base of Hottentotskloof Pass

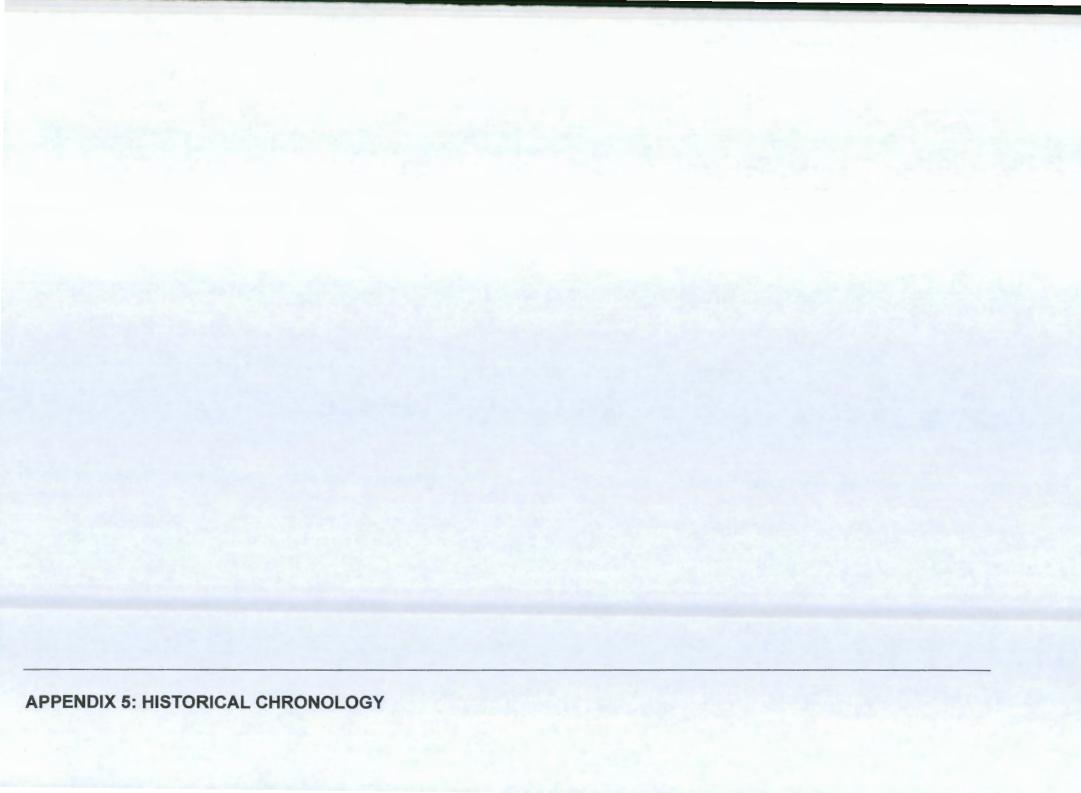
MORPHOLOGICAL ZONE LANDSCAPE SETTING AND HERITAGE RESOURCE **B. MOUNTAIN REGION continued B.10 BO-SWAARMOED VALLEY** Old Cape Road and associated ruins of buildings and stone walled kraal Matjiesfontein homestead and surrounding landscape setting

MORPHOLOGICAL ZONE	LANDSCAPE SETTING AND HERITAGE RESOURCE
C. CERES KAROO	
	C.1 KAROOPOORT
	Views towards Karoopoort from Old Cape Road along the Bo-Swarmoed Valley
	Existing transmission line through the Karoopoort
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	Old toll house and surrounding landscape setting
	Existing transmission line through the Karoopoort

HERITAGE RESOURCE LANDSCAPE SETTING **C.CERES KAROO continued** C.2. PLATKOP OUTSPAN Existing transmission line parallel to historical route through the Ceres Karoo Platfontein homestead and associated graveyard



Appendix 5



SECTION 1: Melkbosstrand to Witsenberg Mountain range

Period	Role/Theme	Associations/ People/Events Activities/Elements/Buildings	Nature of significance	Material evidence Physical/Documentary
Precolonial	Traditional hunting and grazing territory for indigenous groups	The study area has a long history of human occupation. Stone artefacts dating to the Early Stone Age (700 000 years ago) and the Middle Stone Age (150 000 – 30 000 years ago) have been found in agricultural fields, along river banks and mountain slopes. From 30 000 years ago the area was populated by people who lived in caves and shelters and hunted wild animals and gathered wild plant foods (Bushmen or San). At about 2000 years ago, Khoekhoe or herders moved into the region. The Khoekhoen herds competed directly with the wild game for grazing and gradually the Bushmen were displaced, moving to mountainous areas unsuited to the Khoekhoe and their herds.	The tension between groups of indigenous people is indicative of the competition for natural resources.	Rock painting sites at Wemmershoek Dam and Bainskloof, as well as possible sites on Paarl Mountain have been reported. The tension between the Bushmen and the Khoekhoe is illustrated by the names by which the Khoekhoe called the Bushmen. 'Oubiqua' or 'Sonkwa' in the Khoekhoen language meant 'murder'. The collective name given to the Bushmen by the Khoekhoe, San, is also a derogative term¹.
Dutch 17 th century	Traditional grazing land of Khoekhoe. Arena for stock trading between Khoekhoe and VOC representatives and (illegal) freeburghers.	Gonnema's kraal was thought to be in the vicinity of present day Riebeeck Kasteel.	Landscape forming interface between Bushmen, Khoekhoe and VOC stock traders and illegal stock farmers.	An archaeological site at Voëlvlei dam shows evidence of trade between freeburghers and indigenous groups.
		1700 VOC outposts established at Sonquasdrift, Riebeeck Kasteel and Vogel Vlei (Voëlvlei) and in the Tulbagh area. Just beyond the Pass. The purpose of these outposts were (i) acquire cattle and stock from Khoekhoe (ii) to defend the settlements from possible attacks. By 1705 these outposts were closed as they no longer had a role to play. The outposts no longer had contact with cattle owning Khoekhoe, who were in any case no longer presented a military threat. The outposts were then granted as farms.	Mountain passes, such as Du Toit's Kloof, Sebastiaans Kloof, Elands Kloof Pass and the Roodezands Kloof, in all likelihood had their roots in Khoekhoe and Bushman paths across the mountains.	Khoekhoen kraals have been difficult to locate: society was characterised by high mobility. Whatever ephemeral evidence may have remained would be destroyed through subsequent ploughing and development of agricultural fields. Place names such as Sonquasdrift, Hawequa-and Obiqua Mountain remain as testimony to the indigenous inhabitants of the region.

¹ The relationship between the Dutch and the Bushmen was marked with mutual aggression. The Bushmen, already under environmental pressure from the Khoekhoen herds, fiercety defended what was increasing becoming their last strongholds. When the stock farmers started encroaching into the interior, they were attacked and their cattle stolen. During much of the 18th century commandos were organised by freeburghers, to punish (effectively massacre) Bushmen groups that were seen to be harassing farming settlements.

		1700 – 1714 expansion of stock farmers into Tulbagh area.	It was common for established farmers to acquire farms in the outlying areas for the purpose of grazing their stock. It was usual for land that was not situated close to water to be granted as loan farms (under the Dutch) or in quitrent (under the English) and to be used to graze stock.	
Dutch: 18th century	Expansion of settlements into the interior – shifting of the settlement boundaries	1743 establishment of Church at Swartland. Church was built on land of Widow vd Westhuisen, Welvergenoegd). Parsonage built 1771.	Malmesbury established as a church town to service farmers of the Swartland area.	
		1743 establishment of church town at <i>Roodezand</i> in <i>Het Land van Waveren</i> (Tulbagh). The church was completed in 1748. The original parsonage was replaced in 1769. Although small, a town had already been established by the end of the 18 th century with Church Street as its main axis.	Tulbagh established as church town to service farmers of the Hantam region.	Early farms in the Tulbagh area Kruisvallei, Meulstroom and Dennelaan (Aikman n.d.)
		c1800, town at Swartland, very small, consisting of only church, parsonage and a handful of houses.		
	Establishment of administrative centres	In 1804 Tulbagh was proclaimed a drostdy and its district extend northwards to the Hantam. Renamed Tulbagh in honour of Governor at the Cape, Ryk Tulbagh.		Drostdy was originally situated just to the north of the village of Tulbgh.
		1819 Worcester was initially proclaimed a sub-drostdy of Tulbagh. After a storm in 1822 the drostdy was shifted to Worcester. Tulbagh downgraded.		
British: 1806 – 1850		1827 Malmesbury proclaimed a town, and church ground subdivided and put up for sale and officially named in 1829 by Sir Lowry Cole.	Development of Malmesbury as town dating to 19th century	
		Early 19th century Cloovenburg, Allesverlooren, Goedgedacht granted in the vicnity of Riebeeck West.	White werf walls of Allesverlooren and Cloovenburg landmarks	

	Establishment of Mission villages	Abolition of slavery in 1824 lead to the liberation of slaves at the Cape in 1834. Steinthal was established in 1843 by the Rhenish Mission Society on the original farm Witzenberg.	Profound effect on the architecture of the landscape. Prior to the abolition of slavery, slaves were housed either in the dwelling house (17th century) or in a separate building within the werf (18th and early 19th century). After the abolition, small cottages were built to house the freed slaves. On the farms, these cottages were removed from the werf. Many freed slaves chose to move to a number of mission stations rather than return to the farms on which they had previously lived ² .	Mamre, Hermon, Saron, Steinhal
	Formalisation of road network	c1850 The establishment of the Road Management Board		
1851 – 1900		1855 proposal to use part of farm Allesverloren to establish a church town. Congregation finally formed in 1858.	Mid Victorian village develops at Riebeeck West ³ .	
		1858 Philadelphia established as a church town to service the needs of the farming community at Koeberg. Portion of the farm Dassenberg acquired for this purpose. Permission was only granted in 1863.		
	Establishment of rail network	1863 Railway line form the Cape reached Wellington		
		1863 separate parish established at Riebeeck Kasteel.		
		1866 Diamonds discovered in Kimberly	Demand for timber in construction of railway line as well as in mining operations lead to plantings of gum and pine in the Tulbagh valley (Aikman n.d.) Wood also	Commercial forests along mountain slopes of Tulbagh and Wolseley (Aikman.d.)

The success of the Moravian mission stations largely paved the way for similar mission stations under the auspices of Mission Societies.
 Divisional maps c1880 show original village at Riebeeck West as 'Ribeeck Kasteel'. No village shown at present site of Riebeeck Kasteel.

			important as source of packaging material during the 19th century.	
		1870 Mission station associated with the DRC Wellington established at Hermon on the farm Rondeklip		Described by Attwell & Jacobs (2003) as 'Capsule of late 19th century rural life'
		1873 Railway line reaches Tulbagh		
		Bulpin (2001) states that Gouda was established on a farm of the same name and that it had its origins in a railway siding and station called Porteville road.		Payne & Dixon Military survey 1809 shows a 'cross roads' at the approximate location of Gouda. Near the foot of the Roodezand Pass. It is possible that this served as an informal outspan before attempting the pass. More research is needed to confirm this.
1900 – end of WWII		During the Anglo-Boer War, a number of blockhouses were built to protect the railway line. The most southerly on these blockhouses are found to the north of Wellington.		
Post WWII				
Apartheid era c1950	Racial segregation legislated	Group Areas Act	Separate urban development	eg Wesbank and Malmesbury; Wizenville and Tulbagh
		1971 the Voelvlei dam was completed.		
Post- apartheid	Repeal of discriminatory apartheid laws	Reconstruction and Development Programme implemented	RDP housing developments on outskirts of towns	Eg Chris Hani township outside Tulbagh

Section 3, 4 & 5: Ceres to Victoria West

Period	Role	Associations/ People/Events Activities/Elements/Buildings	Nature of significance	Material evidence Physical/Documentary
Precolonial	Grazing land and hunting grounds for indigenous groups.	The name 'Karoo' has its roots in the Khoisan word meaning 'place of great dryness. The Karoo consists of various regions: Ceres Karoo, Tanqua Karoo, Roggeveld, Mordenaars Karoo and the Koup. In the late 16th century, conditions in the Karoo became drier and herders and hunter gatherers who lived in the region moved out. By the late 17th century, conditions improved, but only the hunters moved back. The herders had established themselves in the more water rich southern Karoo and the coastal plains.		Recorded in historic descriptions as 'Caro'. Rock painintgs and engravings are found in some areas of the Karoo. This art form continued in to the 19th century. Rock engravings found at Nelspoort. Finger paintings at Stolshoek, Beaufort West.
Dutch: 1652- 1806		During the initial period of settlement at the Cape, interaction between the Khoekhoe and the freeburgher were kept to a minimum and it was illegal for freeburghers to trade with the Khoekhoe. In addition to stockfarmers from the Cape (freeburghers) invading the Karoo from the south west; stockfarmers (Xhosa) from the east were also moving into the interior.		
	Grazing land of Khoekhoe and itinerant stock farmers and hunting grounds of the Bushmen Landscape of resistance and competition for resources	By 1745 itinerant stock farmers had already expanded into the Bokkeveld and Hantam regions. Farmers followed the lifestyle of the Khoekhoe, constantly on the move with their herds. Resistance by Bushmen to the expansion of the trek farmers into the Karoo was particularly fierce between 1785 and 1795 with the establishment of more permanent farm settlements. Trekfarmers were effectively driven out of the Koup until the end of the 18th century.	Farms without exception were laid out around water sources, alienating indigenous groups to access to water. As was the case in the Overberg, slaves were in very short supply and the shortfall was made up by local Khoisan ⁴ .	Hooyvlakte registered as a loan farm in 1760 to Jacob de Clerq. The farm was situated at the Gamka fontain, the Gamka River until 1860 was perennial, and an additional 4 springs were situated close by at the Kuils River. De Clerq established a fruit farm along the banks of the Gamka River. A system of leiwater furrows irrigated the trees. Some of these furrows may even date to the 1760s. Dried fruit was sold in Cape Town. He had numerous slaves and according to Vivier (1968) a large bushmen

⁴ Dutch period Commandos, established initially to protect farmers from the attacks of Bushmen raiders, evolved into little more than raids stealing women and children to be used as indentured labour on frontier farms. During the British occupations, Bushmen were lured to the farms by promises of food, gifts of tobacco and beads.

			encampment to the west of the Gamka River provided some of the seasonal labour.
British: 1806 – 1850	1818 new administrative centre established at Beaufort (West) on the farm Hooyvlakte. Existing farm buildings converted into dwellings. The farm werf situated towards the north of the village served as temporary drostdy.	The Karoo, although fertile, is prone to drought. Permanent settlement of the region has only been a feature of the 19th century with towns being established near permanent water sources.	Beaufort West Town hall c1866 was first to be built in the Karoo.
	1818 Mission station established on farm Kookfontein, Beaufort West, but abandoned after only 3 years		
	1836 merino wool sheep introduced to the Karoo by Arthur Kinnear. Becomes and important economic product.		
	1837 Beaufort West is the first Municipality to be established		
	1843 church town established at Victoria West on portions of the farms Zeekoeigat and Kapoksfontein. Town situated around fresh water springs.	Well known as best region for sheep farming.	
	1848 town of Ceres established on the farm Rietvalley. Economy based on dried fruit	Association with Andrew Geddes Bain and Charles Bell.	
1851 – 1900	1855 Divisional Council established at Victoria West		
	1856 Mfecane. Increase in numbers of Xhosa living along the Gamka River		Stone walled kraals associated with 19th century Xhosa communities
	1859 Victoria West and surrounding lands get municipal status. Mention of a 'Hottentot' location near the town of Victoria West.		
	1860s Drought causes economical depression	Prior to this, sheep farming was main agricultural activity	
	1866 Diamonds discovered in Kimberly		
	1864 Ceres becomes a municipality		

	Start of the Ostrich Feather Boom		
	1874 Prince Alfreds Hamlet established on portion of the farm Wagenboomsrivier. Was originally an outspan at foot of the Gydo Pass from where the road continues into the Kouebokkeveld		
	1875 rail link from Cape Town to Ceres	Ceres develops as centre of fruit growing district	
	1880 railway line from Cape Town reaches Beaufort West		
	Height of the Ostrich feather industry boom.		
	1886 Gold discovered at the Witwatersrand. The railway line bypassed Victoria West at this stage. Development of stage coach routes through the Karoo Poort to Victoria West. Ceres and Victoria West important stopovers on the route.		See Hall and Mazell (2005) for colonial period paintings in the Swartruggens Mountains possibly related to stage coaches.
	1891 gold discovered nearby Prince Alfreds Hamlet – short lived.		
	1893 Wolseley was established as a railway centre for the surrounding agricultural areas.		
1900 – end of WWII	During the Anglo Boer War (1899-1901) a line of blockhouses were constructed along the railway line.		2 Blockhouses at Wolseley, Laingsburg, Dwyka, Leeuw Gamka Beaufort West and Victoria West
	1904 railway branch from Calvinia completed to Victoria West		
	1904 Merweville established as a church town to service the trek farmers of the Koup region. The church ⁵ was built of the farm, Van de Byl's Kraal (owned by Jacobus Johannes le Seuer van de Byl). Van de Byl's Kraal was only acquired by the DR Church in 1904. A 'coloured' settlement developed alongside Merweville. A stone	Merweville was named in honour of Ds Pieter vd Merwe who was minister at Beaufort West (1897-1899).	The Koup (area for which Merveville is the centre) has its roots in the Khoisan word 'goup' meaning caulfat, and may refer to the event when the rain is plentiful and the game and stock become fat and sleek.

⁵ The church served as a school when not in use as church. The parsonage was built in 1906. A new Church and church hall were built in 1914 and 1916. A new school building was built in 1911.

		building served as church, which was converted into a consistory in 1923 when a new church building was erected.		
		1912 Railway branch from Wolseley via Mitchell's Pass to Ceres opened		
		1913 Ostrich feather industry crashed. Many farmers bankrupt.	Return to sheep farming as main agricultural activity	
-		1929 Railway line extended from Ceres to Prince Albert Hamlet		
Post WWII		1950 dam built of the Gamka River Boom in the wool price		
Apartheid era c1950	Racial segregation legislated	Group Areas Act	Historical labour pools on outskirts of towns eg Kookfontein outside Beaufort West become formalised as so-called 'non-white residential group areas	
		1979 establishment of the Karoo National Park		
Post- apartheid	Repeal of discriminatory apartheid laws	Reconstruction and Development Programme implemented		RDP housing developments on outskirts of towns

Appendix 6

Appendix 6

APPENDIX 6: OUTCOME OF THE CONSULTATION PROCESS

1. ISSUES RAISED IN RESPONSE TO THE EIA PROCESS PD Naidoo EIR: Issues and Response Report, October 2007

The following table of heritage related issues raised by IAP's during the EIA process has been extracted from PD Naidoo's GAMMA GRASSRIDGE 765KV TRANSMISSIION POWER LINES ((X 2)) ENVIRONMENTAL IMPACT REPORT - IISSUES AND RESPONSE REPORT: OCTOBER 2007

NAME AND ORGANISATION	ISSUES RAISED	RESPONSE
Mr David Jacobus Joubert: Haasfontein	The homestead on the farm Haasfontein is one of the few remaining examples of what farm homesteads in the area looked like in the late 1800's and early 1900's which is close to the tar road for people who are interested. The farm has a rich history, inter alia, a rock rampart built during the Anglo-Boer War to watch the enemy across a large area.	A controlled-exclusive surface survey and literature review has been undertaken to address potential impacts on cultural and heritage resources (EIR Volume 1, Sections 8.11 and 9.6). Furthermore, a Heritage Impact Assessment of the final route alignment and tower positions will be undertaken to identify site-specific resources that require protection, including buildings older than sixty years.
Ms Elizabeth Manong: South African Heritage Resources Agency, Northern Cape	How will the proposed operation impact on the cultural heritage of the surrounding environment?	A controlled-exclusive surface survey and literature review has been undertaken to address potential impacts on cultural and heritage resources (EIR Volume 1, Sections 8.11 and 9.6). Furthermore, a Heritage Impact Assessment of the final route alignment and tower positions will be undertaken to identify site specific resources that require protection. The full report has been submitted to various SAHRA offices as requested by SAHRA during Scoping.
Ms Nolitha Ngcai: South African Heritage Resources Agency, Eastern Cape	Heritage resources e.g. living heritage sites, graves older than 60 years, archaeological and palaeontological sites. Living heritage sites includes both the intangible and tangible aspects.	A controlled-exclusive surface survey and literature review has been undertaken to address potential impacts on cultural and heritage resources, as defined by the National Heritage Resources Act, 1999 (Act 25 of 1999)
Miss Leonie Fouche: Camdeboo Local Municipality	 Living heritage sites includes both the intangible and tangible aspects. During the recent review of Camdeboo Municipality's IDP, the protection 	(EIR Volume 1, Sections 8.11 and 9.6). A controlled-exclusive surface survey and literature review has been undertaken to address potential impacts on cultural and

	 of the environment came to the fore and appropriate programmes were proposed; the Environment was included as a Developmental Priority in our 2006/07 IDP. The Karoo is known for its rich cultural and unique natural heritage. The Plains of the Camdeboo contain valuable fossil deposits, some dating back more than 200 million years, and a number of historical sites, especially Khoi-San artefacts, tools and stone structures that bear silent witness to the peoples who once roamed the area, searching for food and shelter. Whilst these rich deposits and historical sites may not all be documented, we know that they exist and many are still to be discovered. It is therefore our plea that all due care and consideration be given to the proposedi nstallation of 765 Power Lines through our Municipal area: the damage to the natural environment and the negative visual impact of these structures are a real and valid concern and we will appreciate a THOROUGH investigation of the proposed route BEFORE any final decision is taken as to the positioning of the corridors and their installations. Damage must be limited to the absolute minimum and disturbed areas properly rehabilitated afterwards. Historical archaeological and paleontological sites that are discovered must be reported, recorded and protected at all costs. Traces of fossils and previous human settlements (specially old stone structures) must not be disturbed or destroyed - please. 	heritage resources (EIR Volume 1, Sections 8.11 and 9.6). Furthermore, a Heritage Impact Assessment of the final route alignment and tower positions will be undertaken to identify site specific resources that require protection. The outcomes of this study have been considered in an integrated manner to determine a final alignment that has the least possible impacts on the environment.
Ms Mary Leslie South African Heritage Resources Agency: Western Cape	 In terms of the National Heritage Resources Act (No 25 of 1999) no archaeological of palaeontological sites may be disturbed without a permit. This means that before such sites are disturbed by exploration or mining it is incumbent on the mining developer, if it is not to find itself in contravention of the legislation, to ensure that an archaeological and if applicable a palaeontological assessment has been done and that appropriate mitigation has happened. An accredited specialist can be contracted to either provide a Phase 1 (Archaeological) Impact Assessment Report or alternatively the specialist may provide a letter to the heritage authority to indicate that there is no necessity for any further assessment. This Phase 1 Impact Assessment Report will identify the archaeological sites and assess their significances. It will make recommendations (as indicated in section 38 of the Act) about the process (for example a Phase 2 mitigation). At the end of the process the heritage authority may give permission for destruction 	A controlled-exclusive surface survey and literature review has been undertaken to address potential impacts on cultural and heritage resources (EIR Volume 1, Sections 8.11 and 9.6). Furthermore, once the final route alignment and tower positions have been determined a site-specific Heritage Impact Assessment will be undertaken to identify site-specific resources that require protection, disturbance or destruction, and therefore, permits from SAHRA.

	of the sites. If there are other heritage resources that may be impacted such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewscapes that require protection, these must also be addressed. These will be addressed by Northern Cape PHRA (except for grave which will be addressed by us). Alternatively it may be more appropriate to conduct the full Heritage Impact Assessment (See Section 38 NHRA), which would include the archaeological and palaeontological components.	
Dr John Raimondo: African Environmental Solutions	Section 6.4 Cultural and heritage resources. The authors seem to be unaware of the recent "discoveries" by Dr Cyril Hromnik of pre-colonial Indo-Quena stone temples in the Karroo. He should be contacted at Tel. & fax: 021 689 4463 to check if similar structures are likely to be found in the areas covered by the corridor. His response should be included in the FSR so that if necessary relevant studies / investigations can be included. NB It is not enough to consider the Pylon sites, as implied on page 76, as the temples depend on lines of sight.	A controlled-exclusive surface survey and literature review has been undertaken to address potential impacts on cultural and heritage resources (EIR Volume 1, Sections 8.11 and 9.6). The corridors as currently indicated are 6 km wide, within which a 160m servitude must be acquired. A final alignment must still be determined. Thereafter, the micropositioning of towers can occur, enabling the avoidance of sensitive areas. Furthermore, once the final route alignment and tower positions have been determined a site-specific Heritage Impact Assessment will be undertaken to identify site-specific resources that require protection, disturbance or destruction, and therefore, permits.
Rev. William A Thompson: Methodist Church Minister- Preller Road, Uitenhage Springbok Flats	 The church is situated in the above area. The members of the church are opposed tothe corridor as it is recently proposed. They suggest that it might be moved out of the valley area where it has been suggested (329 and 338). The sight of powerlines running in the middle of traditional farm land is the objection. 	The final corridor will be selected based on integrated outcomes from a suite of Specialist Studies, including a controlled-exclusive surface survey and literature review (EIR Volume 1, Sections 8.11 and 9.6) and Visual Impact Assessment (EIR Volume 1, Sections 8.8 and 9.4) that address potential cultural heritage and visual impacts, respectively.
Dr Sarah Wurtz: South African Heritage Resources Agency (SAHRA)	 The proposed corridors for the Gamma-Grassridge Transmission Lines runs through an area where few or no professional surveys of archaeological sites or research projects have been undertaken. The desktop study (2003) and scoping assessment (2006) by Ethembeni Cultural Heritage indicate that only a few sites mainly reported by the public are known in the wider vicinity of the proposed corridors. These 	A controlled-exclusive surface survey and literature review has been undertaken to address potential impacts on cultural and heritage resources (EIR Volume 1, Sections 8.11 and 9.6). Furthermore, once the final route alignment and tower positions have been determined a site-

and Iron Age sites. We would also expect there to be more Stone Age sites that have not yet been identified and perhaps graves and burial grounds.	specific Heritage Impact Assessment will be undertaken to identify site-specific resources that require protection, disturbance or destruction, and therefore, permits from SAHRA.
Decision on Built Environment (e.g. structures over 60 years) and Cultural Landscapes must be made by the Eastern Cape and Northern Cape SAHRA Provincial Heritage offices (contact details given) to whom we will send this comment and the Draft Scoping Report.	A controlled-exclusive surface survey and literature review has been undertaken to address potential impacts on cultural and heritage resources (EIR Volume 1, Sections 8.11 and 9.6), including the built environment and cultural landscape. The full report has been sent to SAHRA Eastern Cape, SAHRA Northern Cape,
	and Iron Age sites. We would also expect there to be more Stone Age sites that have not yet been identified and perhaps graves and burial grounds. The historical structures in the region to be developed have not been assessed. The recommendations that are made in the Draft Environmental Scoping report for review and comment (:76) are not sufficient to protect the heritage resources f the development area. A comprehensive Phase 1 Archaeological Impact Assessment foot survey and assessment of other applicable heritage components must be undertaken for the full extent of the transmission lines. If any evidence of sites, graves or other features is found during development, construction or mining, an archaeologist must be alerted immediately. A Phase 1 Palaeontological Assessment must also be undertaken as the palaeontological fossils and traces in this area may be important. Phase 2 mitigation is being asked for (sampling through excavation and dating). SAHRA will require that, in terms of s.38 (4) (b&c) of the National Heritage Resources Act, the provisions of sections 35 and 36 apply, as appropriate. The specialist will require a mitigation permit from the relevant Heritage Resources Authority. On receipt of a satisfactory mitigation (Phase 2) permit report from the archaeologist, the heritage authority may make further recommendations in terms of these provisions. Very rarely if a site is of high heritage significance the authority may request that it be conserved, that mini-site management plans, interpretive material and possibly protective infrastructure be established. More generally, permission is given for the destruction of the remainder of archaeological or palaeontological sites, after full recording Decision on Built Environment (e.g. structures over 60 years) and Cultural Landscapes must be made by the Eastern Cape and Northern Cape SAHRA Provincial Heritage offices (contact details given) to whom we will send this comment and the Draft Scoping Report.

	during Scoping. However, where possible, Eskom would prefer to avoid buildings.
SAHRA currently has jurisdiction over the Archaeology and Palaeontology of the Northern and Eastern Cape, but not the Western Cape. Therefore decisions on the Archaeology, Palaeontology, Built Environment and Cultural Landscapes in the Western Cape, must be made by the Provincial Heritage Authority, Heritage Western Cape. We will send the relevant documentation and this comment to Heritage Western Cape (contact details given).	Noted, with thanks. A controlled-exclusive surface survey and literature review has been undertaken to address potential impacts on cultural and heritage resources (EIR Volume 1, Sections 8.11 and 9.6), including archaeology and palaeontology. The full report has been sent to SAHRA Eastern Cape, SAHRA Northern Cape, Heritage Western Cape and SAHRA's head office in Cape Town, as requested by SAHRA during Scoping.

2. ISSUES RAISED BY THE APPELLANTS IN RESPONSE TO THE EIA PROCESS as recorded by Mr R Summers:

The following are the issues raised by appellants during the EIA process and have been made available to this report by Nicolas Smith & Associates. Heritage issues are particularly highlighted. Ref: APPEAL IN TERMS OF SECTION 35(3) OF THE ENVIRONMENT CONSERVATION ACT, 73 OF 1989 (AS AMENDED) – 12 July 2006: Nicolas Smith & Associates]:

These are the issues were raised by homeowners, landowners and communities in the Witzenberg Municipal area and who have appealed against the record of decision (ROD) of 12 June 2006, issued by the Department of Environmental Affairs and Tourism.

Issue One

Inadequate identification/assessment of heritage impacts

"It is respectfully submitted that the heritage specialist studies undertaken as part of the EIRdo not adequately address the minimum requirements for a heritage impact assessment (HIA) required for a proposed linear development of this nature (set out in section 38 of the National Heritage Resources Act, 25 of 1999)"

"In particular there is no evidence to suggest that the Department has complied with the proviso to section 38(8) of the National Heritage Resources Act, which stipulates that "the consenting authority must ensure that the evaluation [i.e. an EIA undertaken in terms of the ECA] fulfils the requirements of the relevant heritage resources authority in terms of subsection (3), and any comments and recommendations of the relevant heritage resources authority with regard to such development have been taken into account prior to the granting of the consent."

"The level of heritage specialist input in the EIA process was limited to a Heritage Review, which in general terms implies a "scoping level" of heritage assessment and not a full heritage impact assessment ("HIA"). It is respectfully submitted that, in view of the nature and scale of proposed intervention in the landscape by the proposed transmission line, and the significance and sensitivity of the affected heritage contexts, the EIA process undertaken *in casu* should have complied with, as a bare minimum, the minimum requirements for HIA set out in section 38(3) of the National Heritage Resources Act. It is submitted that the level of heritage specialist input involved in the EIA process only partially complied with the abovementioned legal requirements."

"Further, it is submitted that the scope and expertise of heritage specialist input involved in the EIR did not provide a sufficient basis to inform appropriate decision-making with respect to the range and complexity of heritage issues relating to the proposed transmission line. The Appellants support this contention on the following grounds:

The scope of study undertaken in the Heritage Review report was inadequate in that it was limited to the identification and mapping of potential archaeological and palaeontological sites, and buildings, graves, cemeteries, built structures and landscape features of historical significance."

"The limited scope of study undertaken in the Heritage Review report provides for a very limited definition of heritage resources, which does not take into account the broad definition of heritage resources in the National Heritage Resources Act, in terms of which heritage resources are defined as places and objects of cultural significance for aesthetic, architectural, historical, scientific, social, spiritual, linguistic and/or technological reasons. Accordingly, this definition includes both tangible forms of heritage (e.g. archaeological remains and historical fabric), as well as intangible forms of heritage (e.g. the experiential qualities/character of a place, and cultural traditions, values and meanings associated with a place)."

"The scope of study does not clearly take into account the broad criteria for assessing heritage significance of a place or object as outlined in section 3(3) of the National Heritage Resources Act, namely:

The scope of study does not refer to the system for grading of heritage resources as outlined in the National Heritage Resources Act, namely:

- Grade 1: significant within a national context;
- Grade 2: significant within a provincial or regional context; and

Grade 3: significant within a local context.

The Heritage Review report states that fieldwork and the desktop survey undertaken were severely limited and allowed for a cursory assessment only. It is submitted that any limitations to the survey information relating to archaeological and palaeontological sites should have been subject to professional opinion from experts within these disciplines."

"The Heritage Review report largely relies on a list of existing formally declared heritage sites and published survey information (e.g. Fransen & Cook (1980)). It is submitted that such survey information is generally regarded by heritage practitioners and heritage resources authorities as incomplete and limited, especially with respect those outlying areas of the Swartland, Boland and Karoo regions affected by the proposed transmission line. Further, the emphasis of such previous surveys is on the identification of heritage resources based on historical and architectural criteria rather than the intangible and contextual heritage criteria defined in terms of the National Heritage Resources Act."

The expertise of the specialist (The Agency for Cultural Resource Management) has not been established as the Agency is a consultancy specialising in the field of pre-colonial archaeology. In terms of the accreditation criteria of the Association of Heritage Practitioners in the Western Cape ("AHAP"), the Agency is accredited as a heritage specialist in precolonial archaeology. It is submitted, therefore, that the Agency does not have the relevant expertise to address the range and complexity of heritage issues involved in the project, namely historical archaeological, cultural landscape or intangible heritage issues. "

"Notwithstanding the fact that cultural landscapes provide the essential context for a range of heritage resources, which can take a variety of forms and are themselves a heritage resource, the Heritage Review report focuses on individual heritage resources (in the form of historical farmsteads, outspans, fortifications, routes, etc.) without sufficient consideration having been given to the cultural landscape context, whilst best practice in heritage management, as well as the recently published DEA&DP Guidelines for Involving Heritage Specialists in EIA processes (2005) recognizes cultural landscape analysis as a critical aspect in the identification and management of heritage resources.

The primary overarching heritage issue relating to the proposed transmission line is the potential impacts on varying cultural landscape contexts through which the transmission line will pass. Some of the significant cultural landscapes affected by the proposed project include the following:

- Palaeontological landscapes e.g. the fossil remains of the Great Karoo.
- Historical farmlands, e.g. Tulbagh Valley, which has a history of agricultural production and settlement dating to the late 17th century.
- Historical rural towns and missions settlements and associated settings, (e.g. the historical core of Tulbagh and the nearby Steinthal Mission).
- Pristine/natural or wilderness landscapes, e.g. adjacent proclaimed Nature Reserves and Fynbos/riverine areas.
- Historical farm werfs and their associated settings, e.g. Bartholomews Klip and Elandsfontein.
- Scenic/visual amenity landscape contexts, e.g. scenic route network.

The potential adverse heritage impacts of the proposed transmission line on the cultural landscape contexts have not been adequately assessed. The potential adverse impacts include *inter alia* the following:

- Incompatibility of an industrial land use within a rural or natural landscape context.
- Functional and visual-spatial severance of a cultural landscape context in terms of historical patterns of access, visual linkages and settings.
- Strong linearity of the proposal in relation to historical geometries and related settlement patterns.

- Over-scaled nature of the intervention in relation to the sense of fit of historical settlement patterns with their surroundings.
- Visual intrusion into scenic corridors, gateway conditions.

There is a degree of overlap between the visual and heritage issues of the proposed project, which should have involved the integration of the two specialist studies, especially in terms of addressing scenic resources and landscape character (including both natural and cultural attributes). It is submitted that the absence of such integration is due to the limited scope of the HIA with respect to the definition of heritage resources and insufficient consideration given to heritage related visual issues.

Further, the Visual Impact Assessment ("VIA") tends to focus on the natural physical elements of landscape character (e.g. landform and vegetation), with limited consideration being given to cultural attributes (e.g. historical patterns of land use and settlement, relationships between places and their settings). While the VIA addresses scenic route issues, it does not give sufficient attention to the range of potential visual-spatial impacts of the proposed project on the regional scenic network, including historical passes, gateway conditions and approach roads.

The proposed management recommendations of the Heritage Review are inadequate and/or inappropriate for the following reasons:

No clear indication is given to the preferred alternative routes from a heritage perspective.

Despite the very cursory nature of the assessment and the identification of potentially high to moderate negative impacts on a number of historical sites, no further detailed heritage assessment was recommended.

The Heritage Review recommends that suitable mitigation measures for historical sites be resolved at detailed planning and design stages. This is inappropriate in the context of where moderate to high negative heritage impacts have been identified, e.g. Bartholomews Klip (Section 1), Steinthal mission settlement near Tulbagh (Section 2) and Karoopoort Outspan (Section 3). In this regard, the "No-Go" option or modification to the proposal have not been sufficiently considered, as well as what specific methods of mitigation need to be considered in this regard.

The Heritage Review report states that the recommendations outlined in report should be subject to SAHRA approval, yet this recommendation has not been carried through into the EIR. It is submitted that this falls short of the requirements of section 38(8) of the National Heritage Resources Act which require that the decision-making authority consult with the relevant heritage authority prior to reaching a final decision.

The broader Tulbagh Valley is a landscape context of special cultural significance in terms of the following:

- It is an intact, representative and coherent agricultural landscape.
- It has a nich temporal and thematic layering of history.
- It has unique scenic qualities related to valley condition and interface between agricultural, natural mountain slopes and sheer mountain backdrop.
- It has a history of agricultural production and settlement spanning more than 300 years.
- It has a concentration of heritage places including historical farmsteads, the historical town of Tulbagh and the mission settlement of Steinthal.
- It is traversed by a number of regional and local scenic routes.
- It a number of architectural-historical set pieces, namely Church Street in Tulbagh, which is a
 provincial heritage site.

The Appellants submit that the proposed transmission line will undoubtedly have significant negative visual impacts on the surrounding area and inevitably will detract from the scenic and historical rural character of the area. In this regard, the VIA concludes that the central route through the Tulbagh Valley just south of the town of Tulbagh is preferred from a visual perspective due to the fact that it is aligned along existing infrastructure, e.g.

transmission lines and roads, is in close proximity to fewer towns, and is located along a valley floor which can more easily accommodate tall structures or changes to landform due to the presence of the mountain backdrop. However, without due consideration of the above mentioned cultural landscape qualities, the above conclusion cannot be substantiated on heritage grounds.

A recent heritage scoping study undertaken by CS Design and Melanie Attwell Associates (2006) for the Schalkenbosch Golf Estate in the Tulbagh Valley identified a range of heritage resources located within the immediate vicinity of the town. The diagram (attached hereto as Annexure "E") gives an indication of the range of heritage resources likely to be affected by the preferred central route.

In summary, it is respectfully submitted that insufficient heritage and visual assessment has been given to this local cultural landscape context in order to assess the potential heritage/visual impacts of the proposed project. The Appellants submit that in view of the flawed and/or inadequate assessment of heritage impacts in the EIR, the ROD should be set a side on this basis alone."

3. Issues raised in the HIA Public Participation Process November - December 2008.

Table 1: List of I&APs who requested registration 24 November 2008

Name	Affiliation	email address
Douglas McDonald	Klipdrift Farm	douglas.klipdrift@gmail.com
Mike Hunter	TRIF	mhunter@intekom.co.za
John Vesc	Rocky Valley	rockyvalley@telkomsa.net
Chris Wright	RV Environmental Forum	wright@wcaccess.co.za
Elizabeth Parker	Farmer	elizabeth@rapula.co.za
Natalie Becker		nataliebecker@telkomsa.net
Gayle MacWhannell		gaylemac@ezinet.co.za
Lex van Heerden		LexVanHeerDen@justice.gov.za
Nikki Riley		lionriver@vodamail.co.za
Brian and Erica Bax		erica@brinn.co.za
Brendon McHugh	Wild Olive Farm	info@wildolivefarm.com
Jan Theron	Agric Tu	jan@fisaasbos.co.za
Kenton Bagshaw		thebaqshaws@paarlonline.co.za
George Mills	Chairman: Tulbagh Tourism	suarachas@yahoo.com
Paulo Oliveira		paulo@eurotag.co.za
Herman Grove	DEAT	hgrove@deat.gov.za
Mmamoloko Seabe	Eskom – Land and Rights	Mmamoloko.seabe@eskom.co.za
Mr Calvin Van Wijk	Heritage Western Cape	cvanwijk@pgwc.gov.za
Mary Lesley	APM / SARHA	mleslie@sahra.org.za
Richard Summers	Smith, Ndlovu and Summers	rwsummers@law.co.za
Ernest Grunewald	Eskom – Land and Rights	ernest.grunewald@eskom.co.za
Kentridge Makhanya	Eskom – Land and Rights	kentridge.makhanya@eskom.co.za
Mary Patrick	CAS	maryp@method1.co.za
Ken Haumann	PDNA	ken haumann@pdna.co.za
Nicolas Baumann	Baumann & Winter	urbancon@iafrica.com
Sarah Winter	Baumann & Winter	sewinter@yebo.co.za
Harriet Clift	Specialist	hclift@adept.co.za
Cheryl Beuster	Beuster & Clarke	cbeuster@gmail.com
Tassie Clarke	Beuster & Clarke	tassie.clarke@gmail.com

Lynn Appollis	Eskom	Lynn.Appollis@eskom.co.za
Rodger Peense	Eskom	Rodger.Peense@eskom.co.za