

**A LETTER OF EXEMPTION FOR  
TELECOMMUNICATION TOWERS AT MHLONTLO  
NATURE RESERVE**

**FOR THE INDEPENDENT ENVIRONMENTAL  
ADVISOR CC**

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## Abbreviations

HP	Historical Period
IIA	Indeterminate Iron Age
LIA	Late Iron Age
EIA	Early Iron Age
ISA	Indeterminate Stone Age
ESA	Early Stone Age
MSA	Middle Stone Age
LSA	Late Stone Age
HIA	Heritage Impact Assessment
PIA	Palaeontological Impact Assessment

## INTRODUCTION

Insite Towers proposes to construct a telecommunications base station with a 36m lattice mast on the subject property to provide better coverage and connectivity for the rural settlements surrounding Mhlontlo Nature Reserve close to Tsitsa Falls in the Mhlontlo Local Municipality.

This proposed mast forms part of several infrastructure projects planned by Insite Towers in the Eastern Cape. New communications infrastructure is required to meet the current and future demands for both voice and data communication requirements.

The preferred location on top of the hill north of the Tsitsa Falls is the most desirable with respect to the provision of communication services, although alternatives for getting materials and electricity to site will need to be explored. The development footprint is limited to  $\pm 150\text{m}^2$  and height is 36m.

The generic activities associated with the construction of telecommunications towers include the following:

- o Levelling of the Base Station footprint ( $150\text{m}^2$ ).
- o Construction of a concrete plinth to house the control container.
- o Construction of a concrete foundation to accommodate the mast.
- o Provide power to the base transceiver station as well as the antennae and lights on the mast.
- o Erection of the tower (lattice structure) which will be 36m in height.
- o Erection of a boundary fence to enclose the base station (approx.  $144\text{m}^2$ ).
- o Provision of an access gate.
- o Placement of geofabric and stone chips within the boundary fence.
- o Providing power to site.

Access to the preferred site is on existing tar road from the N2 national road (turn east to Shawbury on the north side of the Tsitsa River, and right/south onto

the dirt road to Tsitsa Falls Lodge for approximately 3.5km. The preferred site is on top of the hill on the western side of the road.

The immediate area of the proposed mast and infrastructure would be cleared and levelled, then the equipment will be placed after the necessary foundations have been laid, and a fence will be erected around the perimeter of the site. Power will be provided from an existing nearby overhead transformer, details of the power line route to site have yet to be confirmed

Umlando was requested to assist in the HIA and suggested that it be exempt from further HIA. Figures 1 – 4 show the location of the site.

FIG. 1 GENERAL LOCATION OF THE STUDY AREA





FIG. 2: AERIAL OVERVIEW OF THE STUDY AREA





FIG. 3: TOPOGRAPHICAL OVERVIEW OF THE EASTERN STUDY AREA (1996)

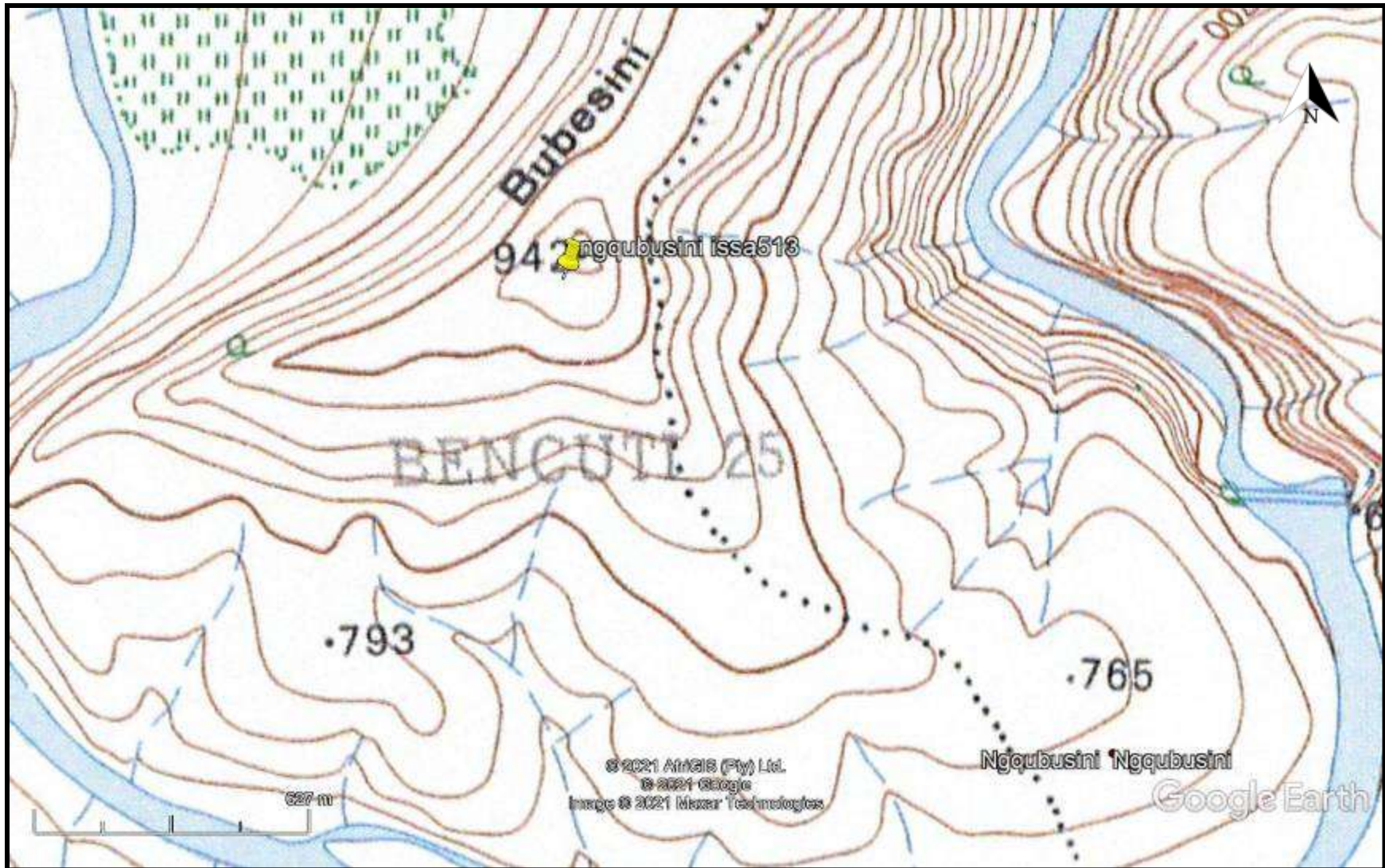




FIG. 4: SCENIC VIEWS OF THE SITE





The desktop study consisted of analysing various maps for evidence of prior habitation in the study area, as well as for previous archaeological surveys. The archaeological database indicates that there are archaeological sites in the general area (fig. 5). These sites include all types of Stone Age and Iron Age sites. No sites occur in the study area.

No national monuments, battlefields, or historical cemeteries are known to occur in the study area.

The 1937 (fig. 6) aerial map indicates that the area was grassland. No built structures occur within the study area.

The 1968 topographical map (fig. 7) indicates that the area did not have any human settlements.

The study area is of no palaeontological sensitivity since it is on dolerite (fig. 8). The SAHRIS Palaeosensitivity map is incorrect for this area.

There proposed mast and road should be exempt from further HIA mitigation

FIG. 5: LOCATION OF KNOWN HERITAGE SITES NEAR THE STUDY AREA



FIG. 6: STUDY AREA IN 1948





FIG. 7: STUDY AREA IN 1956

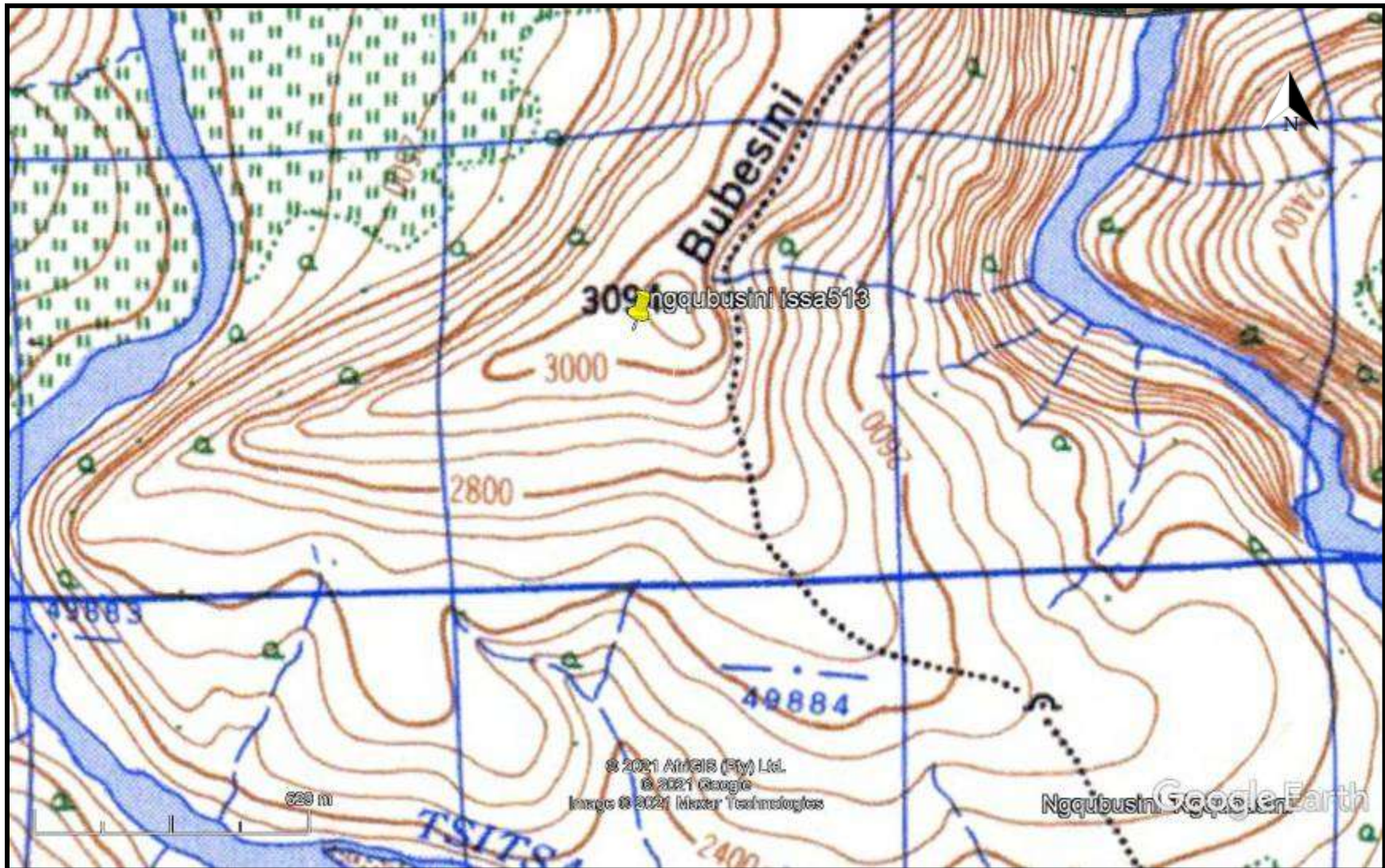


FIG. 8: PALAEOLOGICAL SENSITIVITY



COLOUR	SENSITIVITY	REQUIRED ACTION
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

### **EXPERIENCE OF THE HERITAGE CONSULTANT**

Gavin Anderson has a M. Phil (in archaeology and social psychology) degree from the University of Cape Town. Gavin has been working as a professional archaeologist and heritage impact assessor since 1995. He joined the Association of Professional Archaeologists of Southern Africa in 1998 when it was formed. Gavin is rated as a Principle Investigator with expertise status in Rock Art, Stone Age and Iron Age studies. In addition to this, he was worked on both West and East Coast shell middens, Anglo-Boer War sites, and Historical Period sites.

### **DECLARATION OF INDEPENDENCE**

I, Gavin Anderson, declare that I am an independent specialist consultant and have no financial, personal or other interest in the proposed development, nor the developers or any of their subsidiaries, apart from fair remuneration for work performed in the delivery of heritage assessment services. There are no circumstances that compromise the objectivity of my performing such work.



Gavin Anderson  
Archaeologist/Heritage Impact Assessor