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To whom it may concern

ARCHAEOLOGICAL AND HERITAGE INPUT COMPARATIVE ANALYSIS FOR THE PROPOSED ±250KM 400KV POWERLINE FROM BORUTHO SUBSTATION IN MOKOPANE TO NZHELELE SUBSTATION AND ITS ASSOCIATED INFRASTRUCTURE WALKDOWN SURVEY (2024) AS COMPARED TO THE ORIGINAL (2012) HERITAGE REPORT FOR THE PROPOSED BORUTHO-NZHELELE 400KV POWERLINES, LOCATED IN WATERBERG, CAPRICORN AND VHEMBE DISTRICT MUNICIPALITY, IN LIMPOPO PROVINCE, SOUTH AFRICA.

This letter seeks to highlight the primary distinctions and implications for archaeological significance and heritage conservation between the two assessments. The project area surveyed in 2012 included three corridors (western, central, and eastern), as depicted in Figure 1. During the 2024 walkdown, the project area consisted of a combination of the central and eastern corridors, which were merged to define the approved powerline corridor (Figure 2).

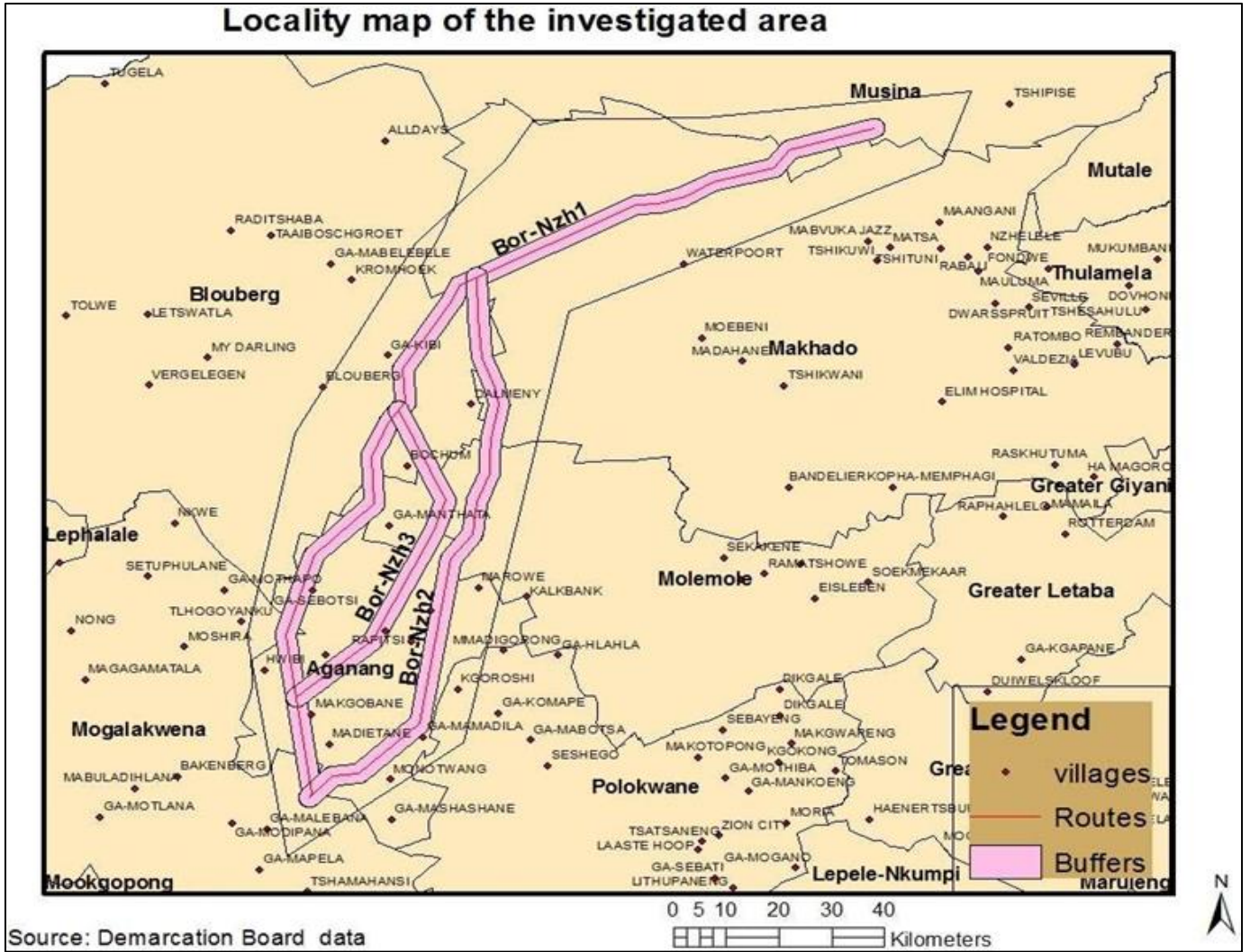


Figure 1: Proposed powerline corridors: 2012 (Adapted from The Biodiversity Company, 2024)

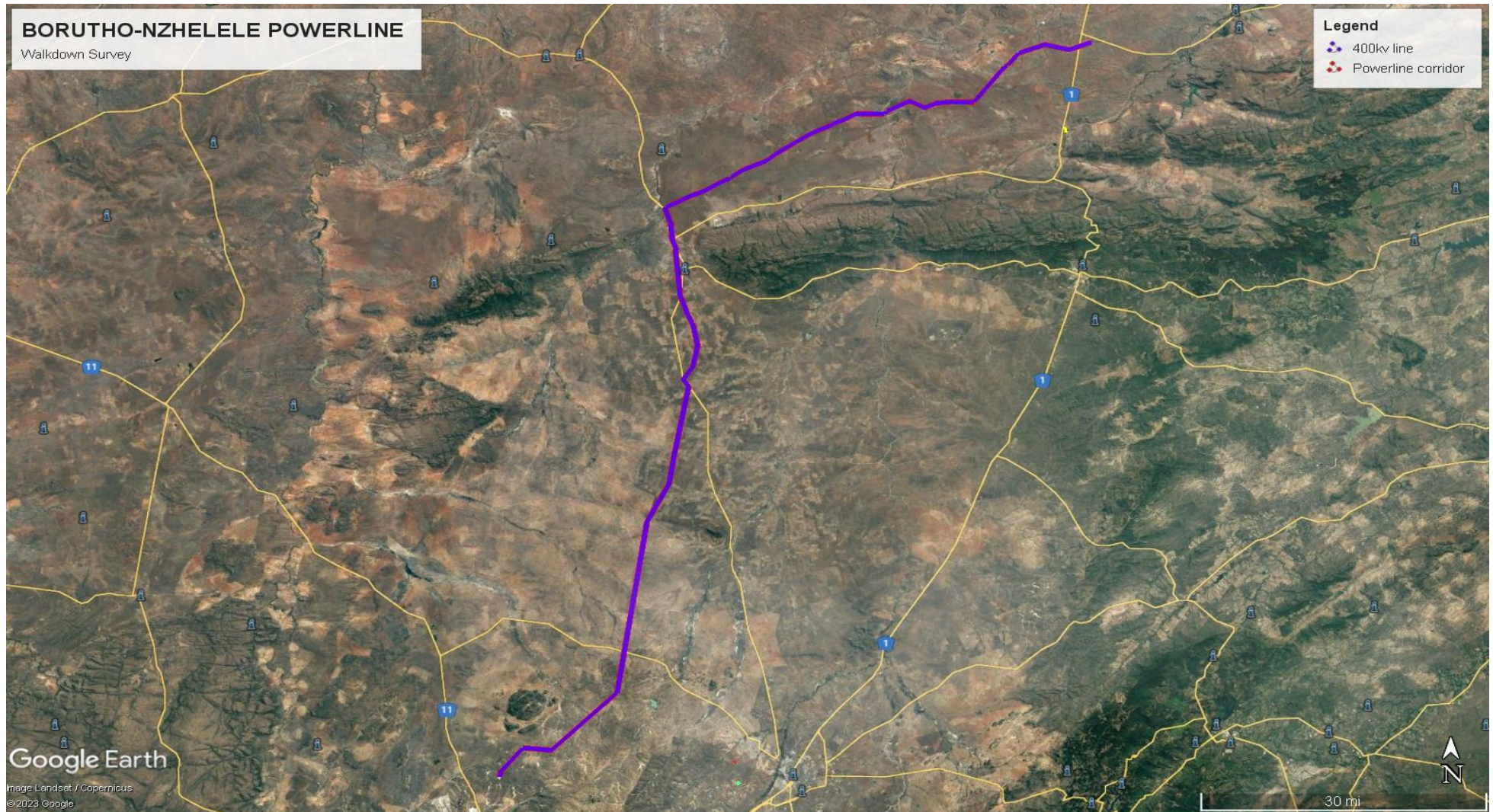


Figure 2: Locality map of the proposed powerline corridor (Sativa, 2024)



| FINDINGS | ARCHAEOLOGICAL AND HERITAGE SURVEY (APRIL 2012) | ARCHAEOLOGICAL AND HERITAGE WALKDOWN SURVEY (APRIL 2024) |
|--------------------------------|---|--|
| Archaeology | <p>Potsherds scattered across the grey soils characterizing the site. It is also closely located to the Makgabeng and Blouberg biosphere and rock art area.</p> <p>The Saltpan Cave site is the nearest rock art site to the proposed corridors – close proximity to Option 1 north of the Soutpansberg Mountains</p> | <p>A scatter of lithic tools was recorded between Tower 90 - 91</p> |
| Burial grounds and Graves | <p>A significant number of the identified sites are burial grounds and graves, including village cemeteries, which are mapped in the GIS for an example of a typical cemetery in the corridor. The physical survey confirmed these sites, revealing additional graves within and between villages. In one of the villages situated along this corridor (Option 3), the archaeological survey using Google Map spot images identified a burial site with exposed remains.</p> | <p>A burial site was identified between Tower 90-91</p> <p>Suspected graves were identified on Tower 114 and between 117-118.</p> |
| Public Monuments and Memorials | <p>None were recorded</p> | <p>None were recorded during the walk down survey</p> |
| Buildings and Structures | <p>The historic built environment includes a few industrial sites, such as the old bridge north of the Soutpansberg range and a saltpan industrial building (Figures 16 & 18). There are also a few historic architectural structures in the village areas within the study zone. However, many of these structures have been altered significantly, often leaving only remnants like roofs or a single façade. Additionally, the village settings do not showcase African vernacular architecture; most villages are modern, with exceptions found in some villages along Option 1 and Option 3.</p> | <p>The general powerline corridor is dotted with rural settlements and farmsteads; however, it is important to note that none of the structures fall within the direct path of the powerline corridor.</p> |



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| <p>Intangible Heritage</p> | <p>The area between Corridor (Option 1) and Option 3 revealed Mogoshi Mountain, which is associated with cultural and spiritual beliefs in the village of Madiyetana. This mountain is nestled between the current corridor (Option 1) and Option 3 and is in close proximity to both corridors.</p> | <p>The selected route does not encroach this sacred mountain and any other located in the general landscape. The approved powerline route was designed to avoid known heritage sites and cultural sites</p> |
|----------------------------|--|---|



After evaluating the two studies, it can be concluded that most heritage-sensitive areas were successfully avoided, as highlighted in the 2024 report by Sativa Travel and Environment Consultants (Pty) Ltd. The approved powerline corridor was designed to avoid known heritage sites that were identified during the 2012 survey such as burial grounds and sacred mountains. which aligns with the findings of the 2012 heritage studies. The 2024 report highlight the importance of mitigation measures and recommends engaging with local communities if tower placements occur near culturally significant sites or within active residential zones. The 2024 study also highlights the importance of the chance find procedure in the event that archaeological remains and human remains are accidentally exposed during construction. The specialist advised adjusting the placement between towers (90-91, 114 and 117-118) as these areas contain high-value heritage sites (burial sites). It is however important to note that if there are technical issues that were considered, grave relocation process must be undertaken. The proposed locality and placement of most towers was deemed acceptable according to the 2024 report, with only adjustments on tower 90-91, 114 and 117-118, and adoption of the following mitigation measures:

- All the stakeholders must agree upon a Monitoring plan or watching brief for the different phases of the project. An archaeologist is employed by the developer to monitor the excavation of foundation and service trenches, landscaping and any other intrusive work where chance finds may be discovered.
- The developer undertakes to give the archaeologist sufficient time to identify and record any chance archaeological finds and features that may be discovered subsurface during construction work in project area.
- If during construction any archaeological remains or human remains are exposed accidentally, construction within the 30m buffer zone of the find must be halted immediately. The ECO must report the matter to the site manager, who will also report the matter to SAHRA. A professional archaeologist must be appointed to assess and manage the finds.
- A heritage resources management plan should be incorporated into the Construction EMP. This includes basic training for construction staff on possible finds, action steps for mitigation measures, surface collections, excavations, and communication routes to follow in the case of a discovery. As precautionary measure and in line with applicable best heritage management principles, the following holds:
 - The Heritage management plan (HMP) issued in this report is applicable especially in chance finds context once construction begins.
 - The foot print impact of each Powerline Structure and associated construction activities should be kept to minimal and within the approved servitude to limit the possibility of encountering additional or chance finds within the powerline servitude.



2012 Recommendations and Mitigation

Option (3) is therefore not a preferred Option in terms of heritage resources management. The same applies to Option 1, which has second highest density of heritage resources when compared to Option 3.

Option 3 is shorter than Options 1 and 2 in length but contains ½ the number of heritage resources identified in Option 1 and has more sites than Option 2.

During the physical survey of the study area, archaeological sites were yielded in Options 1 and 3. No such sites were yielded in Option 2.

It is, therefore, anticipated that more fine-tuned and detail studies of the selected Option in form of HIA could potential yield double the resources found in each of the 3 Options.

The findings from the 2024 archaeological and heritage walkdown report provide a more detailed and restrictive assessment of areas with archaeological and heritage significance compared to the 2012 study. The emphasis on mitigation measures and engagement with local communities in the 2024 report reflects a more proactive approach to preserving heritage sites and minimizing disruption to culturally significant landscapes. Integrating these findings into the planning and implementation phases of the proposed powerline project is essential to ensure the protection of heritage sites and the sustainable use of the land.

We hope the information provided meets your needs.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Trust Mlilo'.

Trust Mlilo