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NTCSA GREATER EAST LONDON PHASE 4 (PEMBROKE TO POSEIDON) POWERLINE, EASTERN CAPE.

HERITAGE WALKDOWN REPORT





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Abbreviations

ASAPA	Association of South African Professional Archaeologists
DFFE	Department of Forestry, Fisheries and the Environment
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EAPASA	Environmental Assessment Practitioner Association of South Africa
ECPHRA	Eastern Cape Provincial Heritage Resources Authority
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
ESA	Earlier Stone Age
HIA	Heritage Impact Assessment
LSA	Later Stone Age
MPRDA	Mineral and Petroleum Resources Development Act
MSA	Middle Stone Age
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
NRF	National Research Foundation
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System
WRC	Water Research Commission



Executive Summary

Environmental Impact Management Services (Pty) Ltd (EIMS) have been appointed by the National Transmission Company of South Africa (Soc) (NTCSA) to conduct a walkdown survey for the proposed ± 165 km 400 kV powerline from the Pembroke to the Poseidon Substation as part of the proposed Greater East London Phase 4 Project. The proposed powerline starts near Qonce and ends near Cookhouse, traversing the Buffalo City Metropolitan, Raymond Mhlaba and Blue Crane Route Local Municipalities in the Eastern Cape. As a requirement of the EA and the Environmental Management Programme report (EMPr), a heritage assessment must form part of the walkdown for the approved project infrastructure footprint. A walkdown was undertaken from the 7 April to 17 April 2025. This report relays the findings of this walkdown.

Sixty-nine (69) heritage features were identified during the site-specific walkdown survey. These included several confirmed graves, Stone Age sites, as well as markers representative of the cultural heritage of the area. **The development will potentially have an impact on 46 of the identified features apart from underground heritage features as well as the intangible heritage and sense of place of the area. However, identified impacts can be mitigated, primarily through avoidance.** A Chance Find Procedure is recommended to manage any further discoveries during development should finds be discovered during the proposed activities. This includes halting activities if significant finds are discovered, recording their location, and consulting a qualified archaeologist for further evaluation.

While the nature of the activities will have an impact on lower value heritage features, no significant foreseeable impacts can be expected at the individual surveyed locations proposed for the construction of towers/pylons, as long as mitigation measures proposed are included in the EMPr and implemented during the construction and operational phases of the development.



1 BACKGROUND INFORMATION

This section provides a background to this report including a description of the project, the details of the heritage practitioner, and legislative requirements.

1.1 DESCRIPTION OF PROJECT

Environmental Impact Management Services (Pty) Ltd (EIMS) have been appointed by the National Transmission Company of South Africa (Soc) (NTCSA) to conduct a walkdown survey for the proposed ± 165 km 400 kV powerline from the Pembroke to the Poseidon Substation as part of the proposed Greater East London Phase 4 Project. The proposed powerline starts near Qonce and ends near Cookhouse, traversing the Buffalo City Metropolitan, Raymond Mhlaba and Blue Crane Route Local Municipalities in the Eastern Cape (See Figure 1 for locality map). As a requirement of the EA and the Environmental Management Programme report (EMPr), a heritage assessment must form part of the walkdown for the approved project infrastructure footprint. A walkdown was undertaken from the 7 April to 17 April 2025. This report relays the findings of this walkdown.

According to the National Transmission Company South Africa SOC LTD (2024) this project is part of the minimum strengthening requirements in the Eastern Cape Province in meeting the IRP 2019 renewable generation integration. There is high potential for wind generation around Poseidon Substation. The expected renewable energy generation to be evacuated from the Port Elizabeth power pool is approximately 5 GW as per the IRP 2019. There has been minimal progress achieved on the Greater East London Strengthening phase 4 project thus far because of resource constraints as well as the relocations on the revised Greater East London strengthening phase 3 (Neptune – Pembroke 400 kV line and associated substation works) that were taking priority. The phase 4 project only recently became a priority project due to the IRP 2019. The concept designs that were originally done for Greater East London Strengthening phase 3 were no longer applicable to the Greater East London Phase 4 because of the re-phasing, change of scope and it was no longer valid as it was done almost 10 years ago. The concept designs for the Greater East London strengthening phase 4 project were recently redone and approved at the PDE DRT.

1.2 HERITAGE SPECIALIST DETAILS

As prescribed by the SAHRA Minimum Standards (2007), a Heritage Specialist (Professional Archaeologist) was appointed for the undertaking of a Heritage Walkdown Survey. Dr Lucien James was appointed in this regard. The following is a summary of the Heritage Specialist's details. Table 1 provides a summary of the Archaeologist's contact details, qualifications, and professional membership. Refer to Appendix 1 for full CV of Archaeologist.

Dr Lucien James is an Environmental Consultant and Archaeologist with experience in different fields across the Arts, Social Science, Natural Science, and academia in general. He has been employed by EIMS as an environmental consultant since March 2023 working on several projects under various roles. He is registered with EAPASA as a Candidate EAP. Lucien has obtained a BSc (Hons) in Geography, Archaeology and Environmental Studies (Archaeology-focused) and is accredited as a Professional Archaeologist with Association of South African Professional Archaeologists (ASAPA). He holds a MSc in Geography having done research on phytoremediation and the mining industry. In 2024, he completed his Ph.D. through research with a focus on collaborative River Basin Management in South Africa. He has worked as a Teaching Assistant (TA) and researcher since 2018 and engages in academic work through publications and conferences. He has taught 1st year, 2nd year, 3rd year and Honour's Archaeology and Geography courses. His research has been funded by the National Research Foundation (NRF) and the Water Research Commission (WRC). He is also actively publishing new papers in international academic journals. He has presented his research at a national level through various conferences in South Africa and has participated in other conferences and workshops on Climate Change and Climate Change Adaptation.

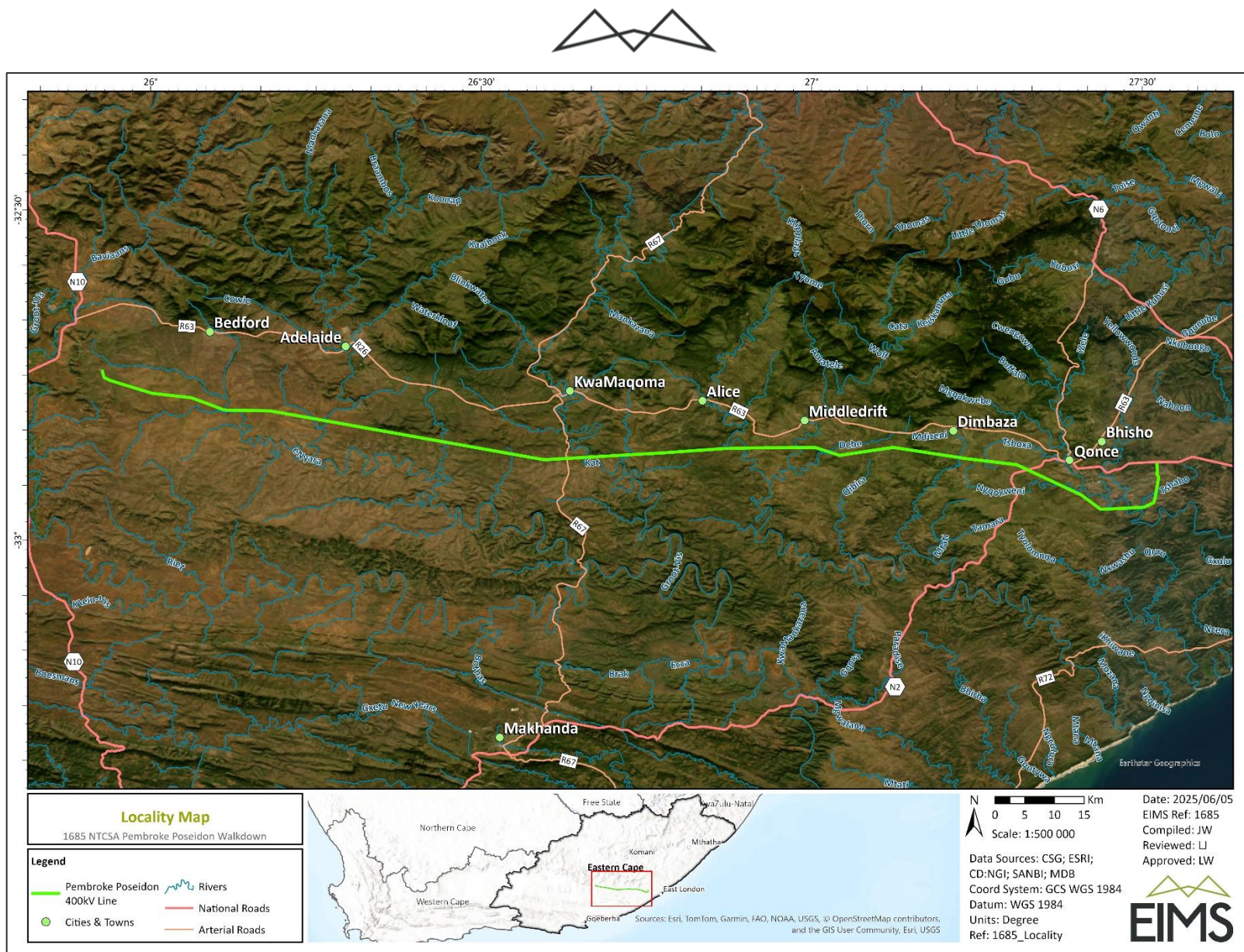


Figure 1: Map of proposed powerline



Table 1: Details of the Archaeologist

Name:	Lucien Nicolas James
Tel no.	+27 11 789 7170
E-mail	lucien@eims.co.za
Professional Qualification/ Training:	BA (Archaeology and Geography); Wits University, 2017
	BSc (Hons) Geography, Archaeology and Environmental Studies; Wits University, 2018
	MSc (Geography, Archaeology and Environmental Studies); Wits University, 2021
	Ph. D; Wits University, 2024
Professional Membership/ Registrations:	Registered Candidate Environmental Assessment Practitioner (EAPASA reg. no. 2023/6772)
	Accredited Professional Archaeologist (ASAPA member no. 0619)

1.3 DECLARATION

Refer to Appendix 2 for Declaration of the Archaeologist.

1.4 TERMS OF REFERENCE

This report achieves several pre-defined objectives as per the prescription of the SAHRA Minimum Standards (2007):

- Identifies the sites as well as potential associated Heritage objects,
- Assesses the significance of sites and Heritage objects,
- Comment on the impact of the development,
- Make recommendations for the mitigation or conservation of sites and associated Heritage objects

To address the terms of reference, a methodology has been adopted. This methodology is further elaborated on in sections to follow.

1.5 LEGISLATIVE REQUIREMENTS

The National Heritage Resources Act (Act 25 of 1999 – NHRA) stipulates that cultural heritage resources may not be disturbed without authorisation from the relevant heritage authority. Section 34(1) of the NHRA states that, “no person may alter or demolish any structure or part of a structure which is older than 60 years without a permit issued by the relevant provincial heritage resources authority...” The NHRA is utilised as the basis for the identification, evaluation and management of heritage resources and in the case of Cultural Resource Management (CRM) those resources specifically impacted on by development as stipulated in Section 38 of NHRA, and those developments administered through the National Environmental Management Act (Act 107 of 1998 – NEMA), and Mineral and Petroleum Resources Development Act (Act 28 of 2002 – MPRDA). In the latter cases the feedback from the relevant heritage resources authority is required by the State and Provincial Departments managing these Acts before any authorisations are granted for a development. The last few years have seen a significant change towards the inclusion of heritage assessments as a major component of Environmental Impact Processes required by the NEMA and MPRDA.

The NEMA 23(2)(b) gives effect to the NHRA and states that an integrated environmental management plan should, “...identify, predict and evaluate the actual and potential impact on the environment, socio-economic



conditions and cultural heritage”. A study of subsections (23)(2)(d), (29)(1)(d), (32)(2)(d) and (34)(b) and their requirements reveals the compulsory inclusion of the identification of cultural resources, the evaluation of the impacts of the proposed activity on these resources, the identification of alternatives and the management procedures for such cultural resources for each of the documents noted in the Environmental Regulations. A further important aspect to be taken into account of in the EIA Regulations under the NEMA relates to the Specialist Report requirements (Appendix 6 of EIA Regulations 2014, as amended) which apply to Heritage Impact Assessments.

The MPRDA also gives effect to the NHRA as this Act defines ‘environment’ as it is in the NEMA and, therefore, acknowledges cultural resources as part of the environment. Section 39(3)(b) of this Act specifically refers to the evaluation, assessment and identification of impacts on all heritage resources as identified in Section 3(2) of the NHRA that are to be impacted on by activities governed by the MPRDA. Section 40 of the MPRDA requires the consultation with any State Department administering any law that has relevance on such an application through Section 39 of the MPRDA. This implies the evaluation of Heritage Assessment Reports in Environmental Management Plans or Programmes by the relevant heritage authorities.

2 ARCHAEOLOGICAL BACKGROUND

A Heritage Impact Assessment (HIA) was conducted in 2011 as part of the Environmental Impact Assessment compiled for the proposed 400kV transmission line between Neptune to Poseidon substations. The report was compiled by Dr J van Schalkwyk (ASAPA no. 168). Archaeological features identified through this assessment include the following:

2.1 STONE AGE SITES

The initial HIA provided comment on the types of Stone Age sites associated with the region. Early Stone Age, Middle Stone Age, and Later Stone Age sites and finds have all been considered in relation to the region. A high-level summary of the different finds and sites to be expected was provided. Stone Age sites and their associated significance was defined as unknown.

2.2 IRON AGE SITES

The potential occurrence of Iron Age sites and finds was highlighted. These were described as potentially located in proximity to watercourses. Once more, Iron Age sites and their associated significance was defined as unknown.

2.3 FARMSTEADS

Farmsteads were also highlighted as potential features to be impacted on by the proposed development. Farmsteads in this sense are described as consisting of “a main house, gardens, outbuildings, sheds and barns, [...] labourer housing and various cemeteries. In addition, roads and tracks, stock pens and wind mills complete the setup.” It was anticipated that the development would have impacts on parts of these farmsteads, and therefore, have impacts on the entire feature as a whole.

2.4 CEMETERIES AND GRAVES

The occurrence of graves was flagged as a concern in the HIA. It was highlighted that apart from recognised and formal cemeteries, a number of graves and whole gravesites occur sporadically across the site of interest. Many of these graves were described as not being fenced and potentially forgotten. Because of the nature of these graves and gravesites, it was suggested that many of these features may be difficult to identify and remain hidden.

2.5 INFRASTRUCTURE AND INDUSTRIAL HERITAGE

Infrastructure such as roads, bridges, railway lines, electricity lines, telephone lines, etc. were highlighted as features that may be affected by the development. Further, it was noted that the development may have a visual impact on features which form part of the touristic experience of the area.



2.6 INTANGIBLE HERITAGE

A key form of intangible heritage highlighted by the HIA which occurs in the area were locations related to conflicts such as the Border Wars. These features include battle fields which are associated with forts and cemeteries as tangible features or markers of these events. Fort Murray was highlighted as one of the features occurring close to the proposed development.

3 METHODOLOGY

The following section describes the methodology used to gather information on potential heritage resources that could be impacted on by the development. This methodology expands on the findings of the original HIA compiled by providing a site-specific assessment. This site-specific assessment included a walkdown survey of the powerline to identify on-site and above-ground heritage markers, sites and artefacts.

3.1 WALKDOWN SURVEY

A site visit was conducted between 7 and 17 April 2025. The site visit included a walkdown along the proposed powerline route as well as a survey of key areas such as the locations where pylons or towers are to be constructed. Focus was placed within the proposed servitude. Observations further away from, or outside the servitude were however considered.

The walkdown itself considered the total span of the powerline of ~150kms. The total span was divided into 11 surveyable segments which were each addressed over a day. A total of 374 of the proposed 390 tower/pylon positions were individually surveyed. Each tower/pylon position was surveyed considering that each structure would have a footprint of about 25x25m. Tower/pylon positions were surveyed on foot, with access to these specific locations occasionally facilitated through driving. Where necessary, heritage features further from the specific tower/pylon footprints were recorded.

3.2 DOCUMENTATION AND ANALYSIS

All observations gathered through the walkdown survey were documented and analysed in terms of their significance. During the field survey, the location of larger Archaeological and Heritage finds was recorded. Smaller Archaeological and Heritage finds were recorded *in situ*. A hand-held GPS device was used to capture tracklogs during the survey which were used to create maps indicating which areas were traversed.

Geotagged photographs were taken throughout the survey. This included the photographing of finds, as well as the surrounding environment. Physical scales were included in all photographs which require an understanding of dimensions, sizes and the colour of finds. For larger finds, a 1,5-meter scale divided into 10cm segments was used. For smaller finds, an IFRAO Standard Scale (Figure 2) was used.



Figure 2: IFRAO Standard Scale used for photography of Archaeological finds.

The appointed Archaeologist also kept written notes about the different findings as well as their context. These were recorded in the Archaeologist's personal field journal.



Sites and finds were subsequently analysed in terms of their significance. Several criteria were used to assess the significance of finds and their bearing on the overall heritage significance and sensitivity of the affected area. Table 2 provides a list of the different criteria considered when assessing the significance of finds and/or site. In relation to each criterion, different questions were embedded in the analysis of sites and finds.

Table 2: Different criteria and questions which guided the analysis of Archaeological and Heritage finds or sites.

Criterion	Questions which guided analysis
Overall Integrity or condition	<ol style="list-style-type: none"> 1. Is the find or site recognisable beyond initial identification? 2. Is the find or site well or poorly preserved? 3. Has the find or site been disturbed or removed from their original context? 4. Has the find been exposed to severe post-depositional damage or disturbance? 5. What types of meteorological and geomorphological events may have disturbed or compromised the integrity of the find or site?
Context	<ol style="list-style-type: none"> 1. Has the surrounding area been highly disturbed? 2. Is it likely that the find has been removed from its original context? 3. Have other individual finds been located within 15 meters of the find, meriting the description of the find as part of a site? 4. Does the find form part of a collection of more than 3 finds located within 15 meters of each other? 5. Could the find form part of a larger, chronologically or contextually related collection of finds in the area?
Spatial relation to other sites	<ol style="list-style-type: none"> 1. Are there any identified sites located near the find or site? 2. To what extent can the find or site be related to all other sites identified? 3. How close are the other sites to the site or find? 4. Does the occurrence of this site or find change the regional heritage or archaeological narrative?
Prehistoric and historical provenance	<ol style="list-style-type: none"> 1. Can the find or site be identified in terms of which period it relates to, i.e. Stone Age, Iron Age, or Historical? 2. Does the find corroborate or correlate with general understandings of the period it relates to? 3. Does the find or site fit into the heritage narrative of the region or province? 4. Does this find or site add new insight to contemporary understandings of the period it relates to? 5. Does this find or site add new insight to contemporary understandings of Archaeology in South Africa?

3.3 CLASSIFICATION OF SITES

Considering the above-described documentation and analysis methods, heritage finds and sites were classified or graded according to the SAHRA Minimum Standards (2007) recommendations. The grading system adopted in this report is captured in Table 3.



Table 3: Classification of heritage sites as per the SAHRA Minimum Standards (2007) and adopted in this report

Level	Grade	Significance	Action
National	I	High	Nominate for Field Rating/Grade I
Provincial	II	High	Nominate for Field Rating/Grade II
Local	IIIA	High	Retain as heritage register site, no mitigation advised
Local	IIIB	High	Mitigate and retain as heritage register site
General Protection A	IV A	High/Medium	Mitigate before destruction
General Protection B	IV B	Medium	Record before destruction
General Protection C	IV C	Low	No further recording required

The different criteria considered when analysing finds and sites allowed for subsequent grading and classification. In this regard, prehistoric and historic provenance, spatial relations to other sites, and context allowed for the identification of the level of importance of the site or find. In this regard, finds and sites were graded according to if they were of National, Provincial, Local or General significance. Overall Integrity or condition and context guided the advised mitigation action.

3.4 LIMITATIONS

3.4.1 GENERAL LIMITATIONS

Several limitations were expected and encountered while implementing the above-described methodology. Some of these limitations relate to the project itself, while some are more general, relating to the implementation of the methodology itself.

Firstly, such investigations are limited to the survey from which findings are drawn. In this regard, the findings presented here are limited to surface observations. Below-ground archaeological contexts would only apply in cases where the methodology includes components involving excavations and test pits. To mitigate this limitation, this report advises the application of a heritage chance find procedure to be adopted by the developer in cases where construction activities lead to the identification of unexpected finds.

3.4.2 PROJECT-SPECIFIC LIMITATIONS

Some limitations were specific to the project itself. These were related to the landscape, as well as accessibility of some locations along the powerline.

Firstly, several sections of the powerline traverses through densely vegetated areas. These areas also included impenetrable thickets which had to be circumvented or avoided altogether. The dense vegetation presented a challenge to the above-ground survey and the resolution to which it was undertaken. In other words, ground cover affected the level to which smaller finds could be identified. There is a chance that smaller finds may be discovered following the clearance of areas to be developed. Therefore, mitigation measures have been proposed to account for such occurrences.

Secondly, some areas were inaccessible during the survey. This meant that 16 tower/pylon positions were not surveyed during the walkdown. To address the possibility of the discovery of heritage features at these locations, mitigation measures have been proposed drawing from the information gathered from the surrounding areas surveyed.

Finally, since the survey was limited to areas along the powerline route, the servitude, and the footprints of proposed towers/pylons, this survey does not consider heritage features which may occur further from these



locations. As it is understood that activities will be limited to these areas, a note has been made to remind the developer of this limitation.

4 FINDINGS

A total of 69 features were identified including:

- **8 graves/grave sites** (PEM016, PEM018, PEM020, PEM025, PEM026, PEM030, PEM059, PEM060)
- **30 Stone Age sites** (PEM003, PEM004, PEM009, PEM034, PEM035, PEM036, PEM037, PEM038, PEM039, PEM040, PEM041, PEM042, PEM043, PEM047, PEM048, PEM049, PEM051, PEM052, PEM053, PEM054, PEM055, PEM056, PEM058, PEM061, PEM062, PEM063, PEM064, PEM065, PEM066, PEM069)
- **15 Structures which may be of heritage significance** (PEM001, PEM002, PEM011, PEM012, PEM015, PEM017, PEM021, PEM024, PEM028, PEM029, PEM033, PEM046, PEM050, PEM067, PEM068)
- **2 Modern/colonial sites** (PEM032, PEM044)
- **4 Cultural heritage sites** (PEM010, PEM019, PEM022, PEM023)
- **10 Other sites such as outcrop sites of interest which may be of heritage significance** (PEM005, PEM006, PEM007, PEM008, PEM013, PEM014, PEM027, PEM031, PEM045, PEM057)

Of the 69 features, 46 were flagged as potentially being impacted by the proposed development given their proximity to tower/pylon positions:





- **All 8 graves/grave sites**
- **27 of the Stone Age sites** (PEM003, PEM004, PEM009, PEM034, PEM036, PEM037, PEM038, PEM039, PEM041, PEM042, PEM043, PEM047, PEM048, PEM051, PEM052, PEM053, PEM054, PEM055, PEM056, PEM058, PEM061, PEM062, PEM063, PEM064, PEM065, PEM066, PEM069)
- **1 Cultural heritage site** (PEM019)

The different features identified as well as grading and location is provided in the Table 4. Features listed below include Structures, Stone Age finds and sites, Graves and Grave sites, as well as Other features such as piles of stones which were placed as landmarks or markers. The origin of these place markers were not confirmed, especially since some were related to the powerline tower placements itself as indicated by the NTCSA team on the ground (for example, bend points along the line were marked). Although the nature of these markers is not fully understood, the developer is reminded to remain cautious during construction should the markers be related to cultural heritage or be related to grave sites. Appendix 3 provides a cartographic record of the sites in relation to the development.





Table 4: Summary of different finds and sites identified. Features highlighted in Yellow will be directly affected by the development (proposed pylon position)

ID	GPS Coordinates	Class	Description	Significance / rating
PEM001	-32.895746, 27.523433	Structure	Historical structure potentially part of old farm structures of the area.	High Grade IIIA






ID	GPS Coordinates	Class	Description	Significance / rating
				
PEM002	-32.897689, 27.522455	Structure	Foundation. Recent and part of current settlement. 	N/A
PEM003	-32.952154, 27.468910	Stone Age	Single stone flake 	Low Grade IVC
PEM004	-32.952448, 27.448768	Stone Age	LSA-MSA stone tool site. Includes examples of cores with multiple removals and flakes. 	Medium Grade IVC







ID	GPS Coordinates	Class	Description	Significance / rating
				
PEM005	-32.953620, 27.450167	Other	Place marker 	Low Grade IVC
PEM006	-32.926230, 27.395311	Other	Cultural marker of movement of people 	Low Grade IVC
PEM007	-32.923579, 27.390447	Other	Pile of rocks – possible place marker 	Low Grade IVC



ID	GPS Coordinates	Class	Description	Significance / rating
PEM008	-32.923611, 27.390598	Other	Pile of rocks - place marker? 	Low Grade IVC
PEM009	-32.919764, 27.382455	Stone Age	ESA site including handaxe. 	Low Grade IVC
PEM010	-32.917337, 27.377676	Cultural	Intangible Heritage related - Hearth - fire place of initiates. 	N/A
PEM011	-32.917041, 27.375645	Structure	Stone wall structure	High Grade IIIA






ID	GPS Coordinates	Class	Description	Significance / rating
				
PEM012	-32.916990, 27.375714	Structure	Kraal structure 	High Grade IIIA
PEM013	-32.910171, 27.362170	Other	Stoney outcrop 	Low Grade IVC
PEM014	-32.906169, 27.353774	Other	Stoney outcrop 	N/A






ID	GPS Coordinates	Class	Description	Significance / rating
PEM015	-32.905777, 27.353268	Structure	Stone terracing for farming 	Medium Grade IVB
PEM016	-32.904691, 27.349767	Grave	Graves 	High Grade IIIA
PEM017	-32.904452, 27.349241	Structure	Old foundation 	High Grade IIIA
PEM018	-32.903438, 27.347947	Grave	Graves 	High Grade IIIA







ID	GPS Coordinates	Class	Description	Significance / rating
PEM019	-32.902517, 27.345507	Cultural	Painted stones. Potentially related to intangible heritage. 	N/A
PEM020	-32.884202, 27.295404	Grave	Complete graveyard 	High Grade IIIA
PEM021	-32.883069, 27.287653	Structure	Stone walling/ Stone terracing 	Medium Grade IVB
PEM022	-32.880964, 27.267950	Cultural	Metal sheeting. Potentially part of a structure nearby.	N/A






ID	GPS Coordinates	Class	Description	Significance / rating
				
PEM023	-32.880922, 27.267556	Cultural	<p>Other items associated with a past settlement.</p> 	N/A
PEM024	-32.877587, 27.243430	Structure	<p>Remnants of stone terracing which present as a large pile of stones. Potential to be a grave.</p> 	Medium Grade IVA
PEM025	-32.871753, 27.196602	Grave	Grave	High Grade IIIA







ID	GPS Coordinates	Class	Description	Significance / rating
				
PEM026	- 32.87302284002801 4, 27.19667904511736 4	Grave	Complete graveyard 	High Grade IIIA
PEM027	-32.863657, 27.150500	Other	Stoney outcrop 	Low Grade IVC
PEM028	-32.872056, 27.040870	Structure	Stone walling, possibly terracing for farming. 	Medium Grade IVB







ID	GPS Coordinates	Class	Description	Significance / rating
PEM029	-32.867453, 27.028412	Structure	Stone terracing for farming 	Medium Grade IVB
PEM030	- 32.86925021391737, 27.04993623532765	Grave	Graveyard	High Grade IIIA
PEM031	-32.860030, 26.954971	Other	Place marker 	Low Grade IVC
PEM032	-32.862799, 26.896513	Modern	Midden/deposition of waste material including porcelain fragments. 	Medium Grade IVB
PEM033	-32.861433, 26.896605	Structure	Old cattle dip. Appears part of old farmstead.	Medium Grade IVB







ID	GPS Coordinates	Class	Description	Significance / rating
				
PEM034	-32.861227, 26.885897	Stone Age	Stone tool. MSA Unifacial piece. 	Low Grade IVC
PEM035	-32.876021, 26.618774	Stone Age	Stone core 	Low Grade IVC
PEM036	-32.877011, 26.619869	Stone Age	Stone tool. MSA Unifacial flake - Levallois example. 	Low Grade IVC







ID	GPS Coordinates	Class	Description	Significance / rating
PEM037	-32.876986, 26.620039	Stone Age	MSA site 	Medium Grade IVB
PEM038	-32.876877, 26.621546	Stone Age	Extension of MSA site 	
PEM039	-32.876296, 26.627614	Stone Age	MSA Site - Examples of knapped flakes 	Medium Grade IVB
PEM040	-32.876065, 26.639237	Stone Age	Examples of flaked stone and cores 	Low Grade IVC







ID	GPS Coordinates	Class	Description	Significance / rating
PEM041	-32.877653, 26.605459	Stone Age	ESA tools including a handaxe 	Low Grade IVC
PEM042	-32.877943, 26.598938	Stone Age	ESA Cleaver 	Low Grade IVC
PEM043	-32.862956, 26.508614	Stone Age	MSA site 	Medium Grade IVB
PEM044	-32.862839, 26.508838	Modern	Thick Glass fragments 	Low Grade IVC






ID	GPS Coordinates	Class	Description	Significance / rating
PEM045	-32.853538, 26.456400	Other	Recent strap/belt 	N/A
PEM046	-32.842817, 26.394672	Structure	Remnants of a rounded stone structure 	High Grade IIIA
PEM047	-32.841091, 26.383356	Stone Age	MSA flakes 	Low Grade IVC
PEM048	-32.840690, 26.382608	Stone Age	Other examples of MSA cores and flakes 	Low Grade IVC







ID	GPS Coordinates	Class	Description	Significance / rating
PEM049	-32.837653, 26.364393	Stone Age	Stone tool flake 	Low Grade IVC
PEM050	-32.834570, 26.347037	Structure	Farm dams - potentially very old but not confirmed older than 60 years. 	High Grade IIIB
PEM051	-32.831049, 26.330414	Stone Age	MSA Site  	Medium Grade IVB







ID	GPS Coordinates	Class	Description	Significance / rating
PEM052	-32.824661, 26.294709	Stone Age	Single stone tool - similar to other MSA examples 	Low Grade IVC
PEM053	-32.824249, 26.289773	Stone Age	MSA Site 	Medium Grade IVB
PEM054	-32.823026, 26.285359	Stone Age	Single LSA piece 	Low Grade IVC
PEM055	-32.821761, 26.275868	Stone Age	ESA Cleaver	Low Grade IVC







ID	GPS Coordinates	Class	Description	Significance / rating
				
PEM056	-32.820786, 26.271059	Stone Age	Stone tools MSA/LSA 	Low Grade IVC
PEM057	-32.819793, 26.266553	Other	Place marker 	Low Grade IVC
PEM058	-32.819826, 26.266621	Stone Age	Some examples of ESA/MSA tools - Stone cleaver as an example 	Medium Grade IVC






ID	GPS Coordinates	Class	Description	Significance / rating
PEM059	-32.820293, 26.269025	Grave	<p>Complete graveyard included ~10 graves. Many graves covered in vegetation and difficult to identify.</p> 	High Grade IIIA
PEM060	-32.819750, 26.266771	Grave	<p>Complete graveyard including ~10-15 graves. Landscape very eroded.</p>   	High Grade IIIA







ID	GPS Coordinates	Class	Description	Significance / rating
				
PEM061	-32.818318, 26.261009	Stone Age	MSA point - part of closer site 	Low Grade IVC
PEM062	-32.818334, 26.261419	Stone Age	MSA Site 	Medium Grade IVB
PEM063	-32.818081, 26.258549	Stone Age	MSA Site 	Medium Grade IVB



ID	GPS Coordinates	Class	Description	Significance / rating
PEM064	-32.818246, 26.256846	Stone Age	Part of MSA site 	Medium Grade IVB
PEM065	-32.817834, 26.254830	Stone Age	MSA Site 	Medium Grade IVB
PEM066	-32.815568, 26.242669	Stone Age	Stone tool flake/MSA stone tool piece 	Low Grade IVC
PEM067	-32.808219, 26.206399	Structure	Old water trough. Age of structure not verified.	N/A



ID	GPS Coordinates	Class	Description	Significance / rating
				
PEM068	-32.803835, 26.116725	Structure	Old buildings and foundations  	High Grade IIIA
PEM069	-32.795404, 26.089307	Stone Age	ESA handaxe 	Low Grade IVC

4.1 IDENTIFIED HERITAGE IMPACTS

Error! Reference source not found. provides a breakdown of the potential impacts identified through this assessment, considering the above-cited and adopted methodology. Following from the original HIA, several



graves, Stone Age, as well as Colonial Period features were identified during the site-specific walkdown. It is important to highlight that some of these features fall in proximity, if not within the footprints of the proposed structures. For this reason, mitigation proposed account for the potential impacts on these features.

A key impact noted was the potential destruction or disturbance of Stone Age and Grave sites. Stone Age sites consist of some extensive MSA sites which will be affected by the proposed structures or pylons/towers. Grave sites consist of large graveyards some of which include up to 20 graves. These features should be avoided, necessitating the potential movement of certain structures and towers.

It is understood that the development will also have an impact on singular finds such as identified stone tools. Where not associated with a specific site, the development may lead to the potential displacement or destruction of singular heritage finds not associated with any above-ground site identified. While these features have been graded as not needing further recording, there is the potential of these finds being associated with below-ground heritage features. For this reason, the location of these features should act as potential markers for additional heritage finds or sites.

The cultural heritage feature identified which may be affected by the development consisted of painted white stones in the shape of a “Y”. This may have been a marker of ceremonies or other intangible heritage attached to the location. While the marker itself is not a heritage feature, the developer must remain considerate of potential impacts on intangible and cultural heritage of the area. This may also relate to the development’s potential impact on the sense of place of the area to be developed which may be attached to intangible heritage as cultural activities were noted in the area. To mitigate the impact of the development on intangible heritage and sense of place, it is important that the developer liaise with nearby communities on a regular basis during construction to minimise the impact of the development.

Other impacts of the development relate to heritage features which may be further from the affected areas or pylon/tower positions such as modern foundations, structures, and deposits. The developer must remain cognisant of this.



Table 5: List of site-specific mitigations and recommendations

Tower/Pylon	Feature Affected	Mitigation Measures / Management Actions	Compliance with Standards	Time Period for Implementation
PemPos 30	PEM003	No further mitigation or action is recommended. However, a Heritage Chance Find Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 34	PEM004	A buffer of 30 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to the overall site.	NHRA	During construction activities
PemPos 52	PEM009	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 60	PEM016	A buffer of 50 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature, in this case a grave or grave site, must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to unidentified underground features or graves. It is recommended that the feature be fenced off to ensure it is not disturbed during or after construction. The site should be accessible to any visitors or family members of the interred individuals. Consultation with communities in proximity is advised. Any records gathered in relation to the grave or grave site should be kept for future reference.	NHRA	During construction activities
PemPos 60-61	PEM018	A buffer of 50 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature, in this case a grave or grave site, must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to unidentified underground features or graves. It is recommended that the feature be fenced off to ensure it is not disturbed during or after construction. The site should be accessible to any visitors or family members of the interred individuals. Consultation with communities in proximity is advised. Any records gathered in relation to the grave or grave site should be kept for future reference.	NHRA	During construction activities
PemPos 61	PEM019	The feature itself is not of heritage value; however, the developer is advised to liaise with surrounding communities regarding the significance of this feature. Should the feature not be of cultural heritage significance as per the advice of the community, the feature may be destroyed.	NHRA	During construction activities
PemPos 73-74	PEM020	A buffer of 50 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature, in this case a grave or grave site, must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to unidentified underground features or graves. It is recommended that the feature be fenced off to ensure it is not disturbed during or after construction. The site should be accessible to any visitors or family members of the interred individuals. Consultation with communities in proximity is advised. Any records gathered in relation to the grave or grave site should be kept for future reference.	NHRA	During construction activities
PemPos 95-96	PEM025	A buffer of 50 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature, in this case a grave or grave site, must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to unidentified underground features or graves. It is recommended that the feature be fenced off to ensure it is not disturbed during or after construction. The site should be accessible to any visitors or family members of the interred individuals. Consultation with communities in proximity is advised. Any records gathered in relation to the grave or grave site should be kept for future reference.	NHRA	During construction activities
PemPos 95-96	PEM026	A buffer of 50 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature, in this case a grave or grave site, must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to unidentified underground features or graves. It is recommended that the feature be fenced off to ensure it is not disturbed during or after construction. The site should be accessible to any visitors or family members of the interred individuals. Consultation with communities in proximity is advised. Any records gathered in relation to the grave or grave site should be kept for future reference.	NHRA	During construction activities
PemPos 131	PEM030	A buffer of 50 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature, in this case a grave or grave site, must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to unidentified underground features or graves. It is recommended that the feature be fenced off to ensure it is not disturbed during or after construction. The site should be accessible to any visitors or family members of the interred individuals. Consultation with communities in proximity is advised. Any records gathered in relation to the grave or grave site should be kept for future reference.	NHRA	During construction activities



Tower/Pylon	Feature Affected	Mitigation Measures / Management Actions	Compliance with Standards	Time Period for Implementation
PemPos 168-169	PEM034	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 229	PEM036	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 227-229	PEM037 and PEM038	A buffer of 30 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to the overall site.	NHRA	During construction activities
PemPos 227	PEM039	A buffer of 30 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to the overall site.	NHRA	During construction activities
PemPos 232	PEM041	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 233	PEM042	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 254	PEM043	A buffer of 30 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to the overall site.	NHRA	During construction activities
PemPos 283-284	PEM047	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 284	PEM048	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 296	PEM051	A buffer of 30 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to the overall site.	NHRA	During construction activities
PemPos 304	PEM052	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 305	PEM053	A buffer of 30 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to the overall site.	NHRA	During construction activities
PemPos 306	PEM054	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 308	PEM055	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 309	PEM056	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 310	PEM058	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 309-310	PEM059	A buffer of 50 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature, in this case a grave or grave site, must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to unidentified underground features or graves. It is recommended that the feature be fenced off to ensure it is not disturbed during or after construction. The site should be accessible to any visitors or family members of the interred individuals. Consultation with communities in proximity is advised. Any records gathered in relation to the grave or grave site should be kept for future reference.	NHRA	During construction activities
PemPos 310	PEM060	A buffer of 50 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature, in this case a grave or grave site, must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to unidentified underground features or graves. It is recommended that the feature be fenced off to ensure it is not disturbed during or after construction. The site should be accessible to any visitors or family members of the interred individuals. Consultation with communities in proximity is advised. Any records gathered in relation to the grave or grave site should be kept for future reference.	NHRA	During construction activities
PemPos 311	PEM061 and PEM062	A buffer of 30 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to the overall site.	NHRA	During construction activities



Tower/Pylon	Feature Affected	Mitigation Measures / Management Actions	Compliance with Standards	Time Period for Implementation
PemPos 312	PEM063 and PEM064	A buffer of 30 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to the overall site.	NHRA	During construction activities
PemPos 312-313	PEM065	A buffer of 30 meters must be considered around the feature. Should structure intersect with this buffer, it is advised that the structure be moved. If the structure cannot be moved to accommodate the buffer, the feature must be included in a heritage permit application to account for any potential destruction or disturbance which may occur to the overall site.	NHRA	During construction activities
PemPos 315	PEM066	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities
PemPos 349-350	PEM069	No further mitigation or action is recommended. However, a Heritage Procedure is advised to be followed should additional heritage finds or sites be encountered.	NHRA	During construction activities



5 RECOMMENDATIONS AND MITIGATIONS

Considering the potential impacts identified above, the following presents a list of mitigations proposed.

5.1 SITE-SPECIFIC RECOMMENDATIONS AND MITIGATIONS

Table 13 provides a breakdown of recommendations and mitigations to be considered for inclusion in the EMPr related to this project. These mitigations are associated with construction phase which may involve clearing of vegetation, removal of topsoil, movement of heavy machinery, ultimately leading to the construction of powerline structures. Firstly, mitigation measures here advise for the avoidance of identified heritage features at risk considering buffers as specified in Table 13. Further, the mitigation measures recommended serves to address the potential of further discoveries advising for the implementation or recognition of a heritage protocol and chance find procedure as contemplated in 6.3.

5.2 OVERALL RECOMMENDATIONS

As an overall recommendation, identified heritage features should be avoided to minimise the development's impact. Depending on the feature, it is here recommended that several singular finds such as stone tools can be displaced or destroyed given their low significance and low potential to contribute to the understanding of heritage of the area beyond having been now identified and recorded. However, should avoidance of features such as identified Stone Age sites not be possible, a permit for the destruction of associated sites must be obtained from the relevant Heritage Authority (ECPHRA or SAHRA). Since the development intersects with the occurrence of several graves and grave sites, caution is advised. Buffers associated with these features must be considered during construction, and features must be avoided. Should avoidance of these features not be possible, grave relocation may be necessary as a last resort.

The landscape is rich in cultural heritage given that several communities are found around the area. Communities should be engaged, specifically to understand the development's impact on intangible cultural heritage and sense of place. This should guide the developer in terms of sensitivities to be considered which are not related to Archaeological finds or sites.

5.3 HERITAGE PROTOCOL AND CHANCE FINDS

A heritage procedure is applicable where finds are identified during the proposed activities. This procedure is guided by the NHRA but should correspond with the overall EMPr drafted for the development. The following is a guideline on how a Heritage or Chance Find Procedure can be structured:

- In the event of a chance find which appears of significant value to the lay person, all development activities must be temporarily halted.
- Finds should not be displaced. Instead, their location should be recorded, and a short description prepared for further evaluation to follow.
- A qualified Archaeologist must be consulted to, firstly, record the find and evaluate its heritage significance. The Archaeologist should provide recommendations on how to approach the finds moving forward. This may include recommendations for the mitigation of impacts on the heritage resources in question.
- Should the Archaeologist recommend, development can resume following the application of recommendations and mitigation measures.

The above should act as a brief guideline which should form an intrinsic element of current or future Heritage Procedures or Protocols adopted by the developer of the project in question.



6 CONCLUSION

This report was prepared as a walkdown report for the proposed NTCSA Greater East London Phase 4, 400kV Pembroke to Poseidon Powerline Project. As part of this assessment, an on-site evaluation of heritage impacts was conducted.

Through the methodology adopted as part of this assessment, heritage features were identified which can be avoided during the implementation of the proposed activities. Apart from unassessed chance finds, the development will have different impacts on heritage features. The mitigations recommended here should be sufficient to minimise the development's impact, specifically related to identified graves, grave sites, and Stone Age sites. Therefore, from an Archaeological perspective, the development will not have significant foreseeable impacts and can proceed as long as the recommended mitigation measures are implemented.



Appendix 1: CV of Archaeologist

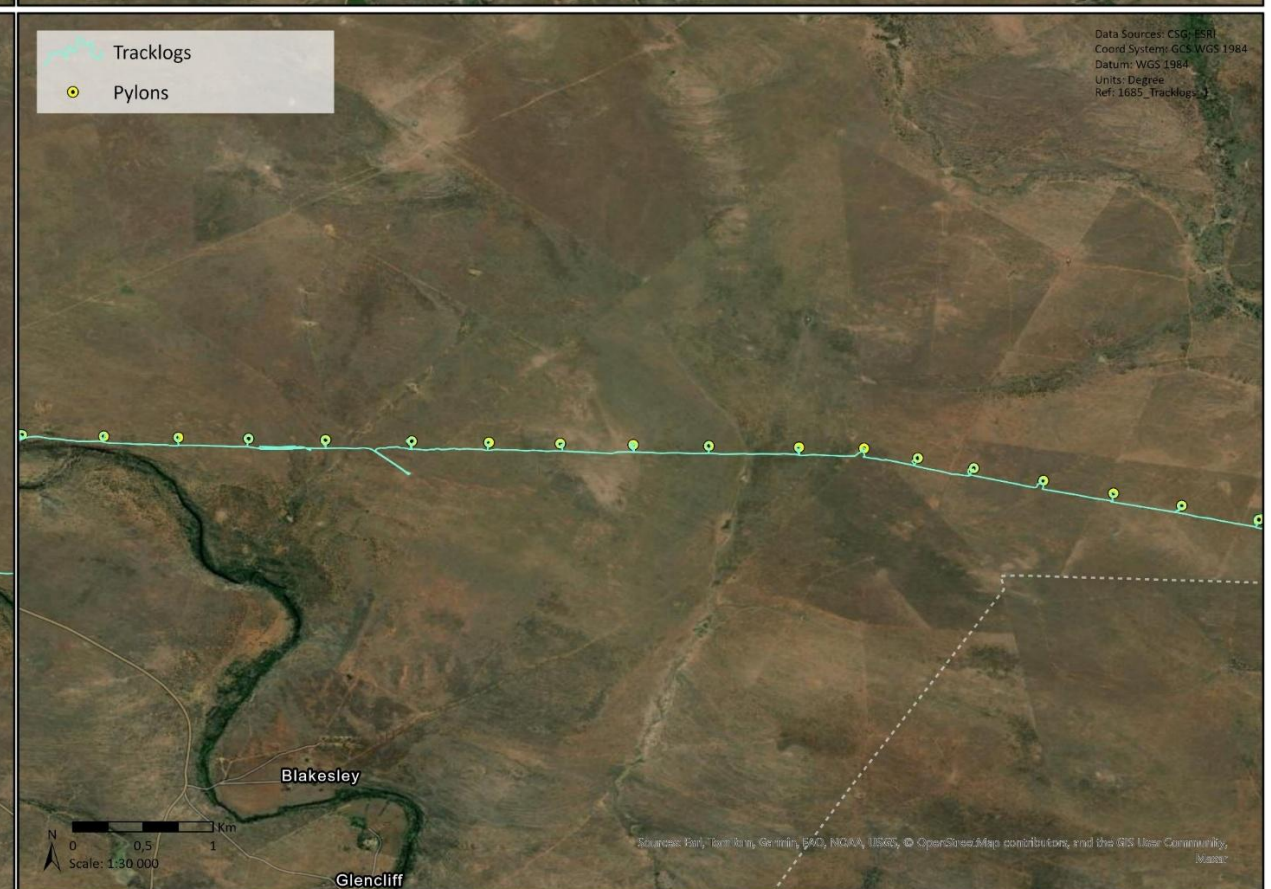
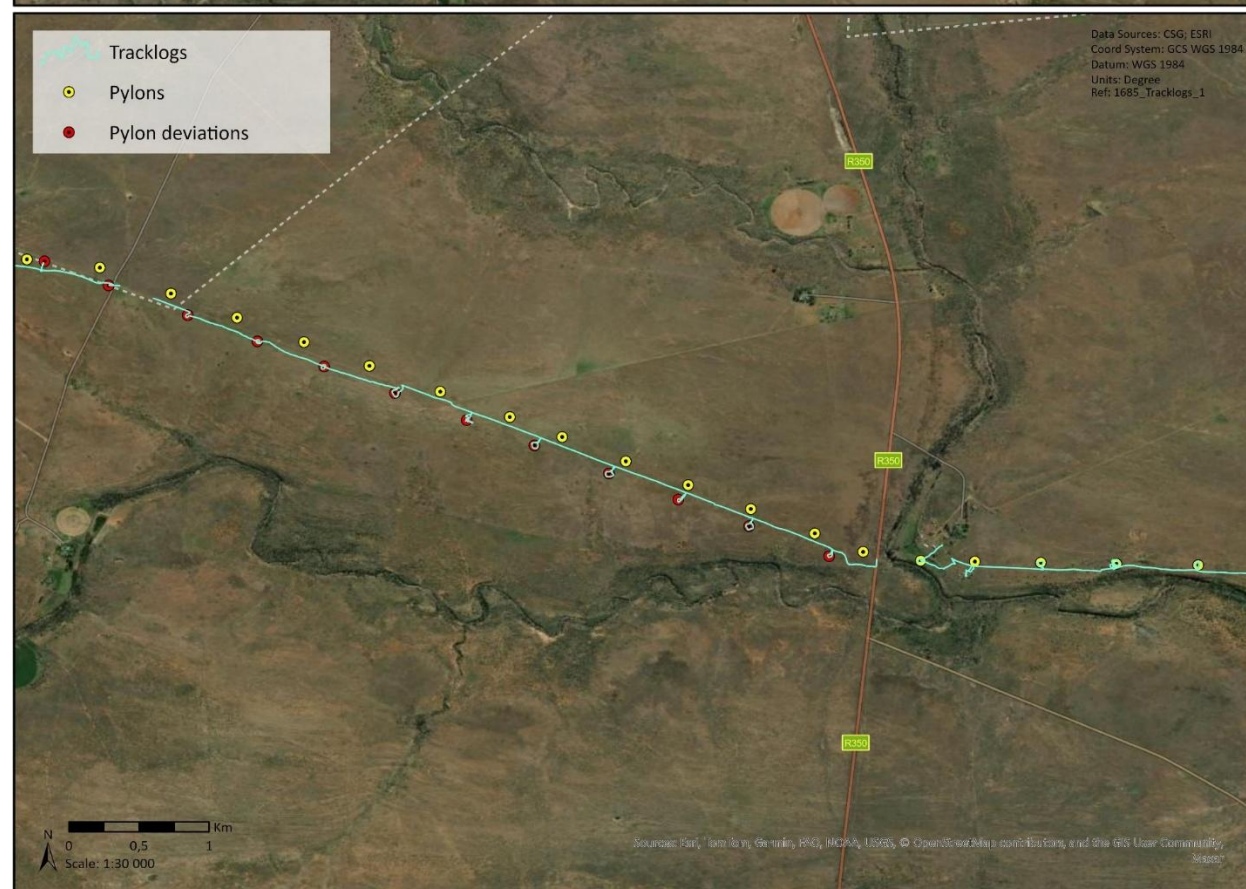
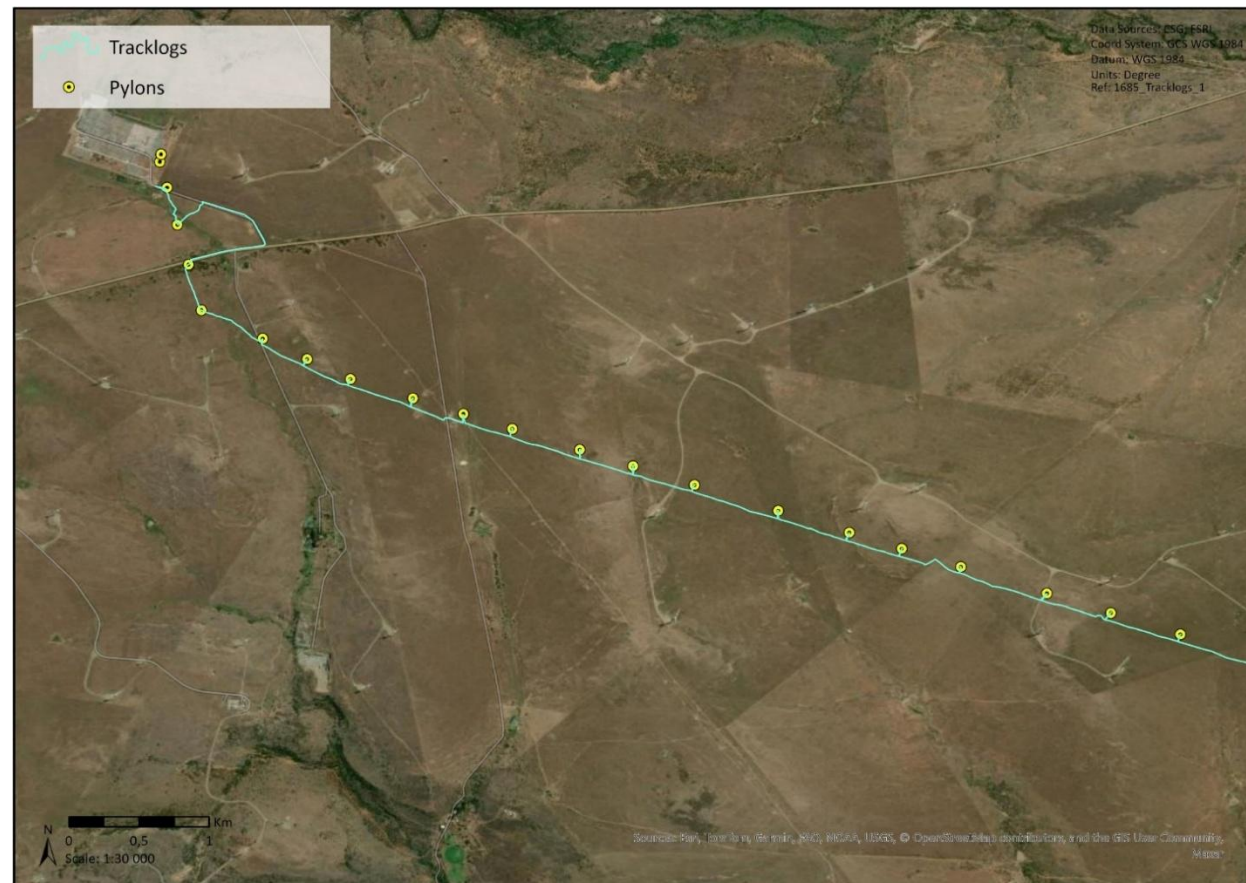


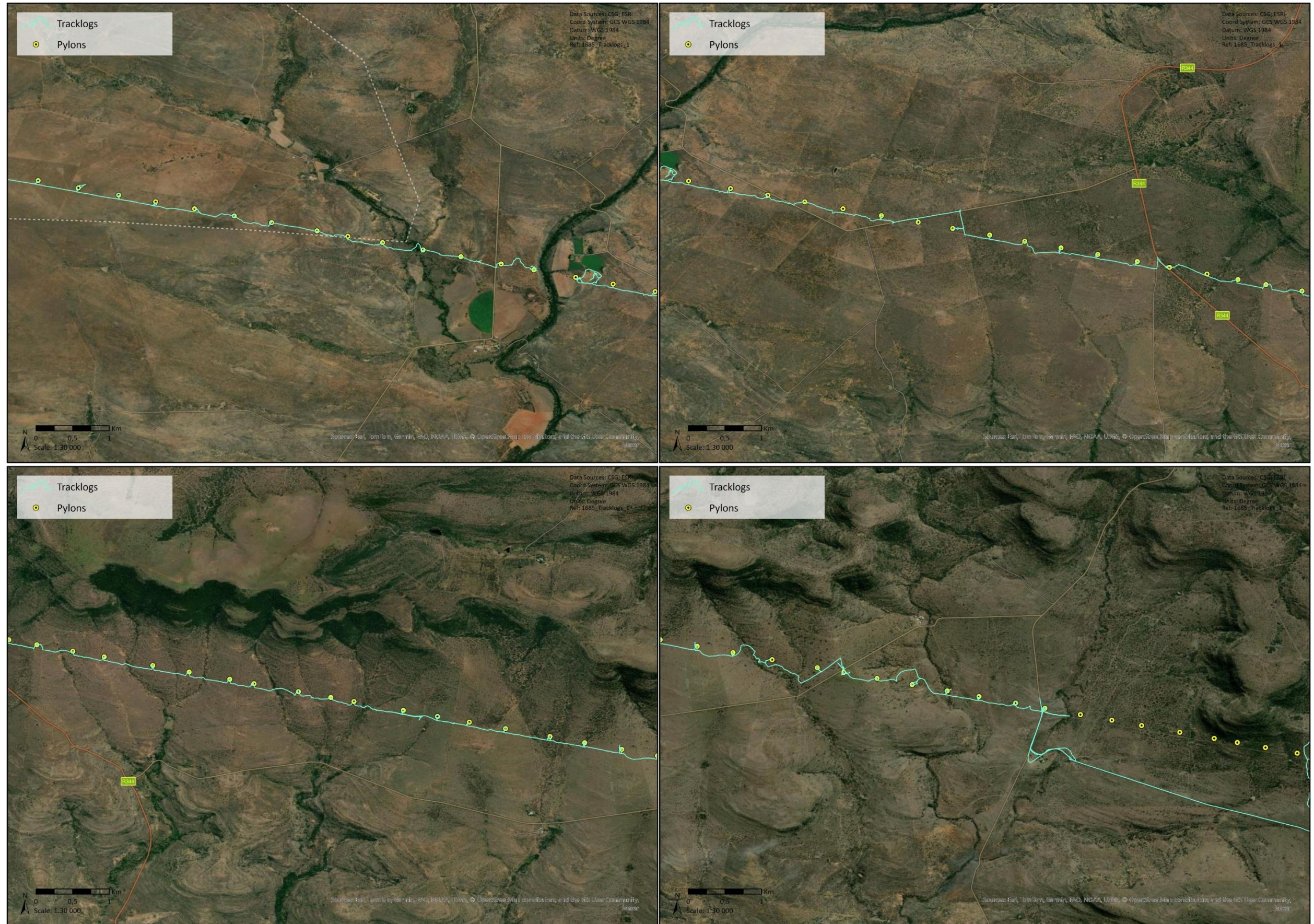
Appendix 2: Specialist's Declaration



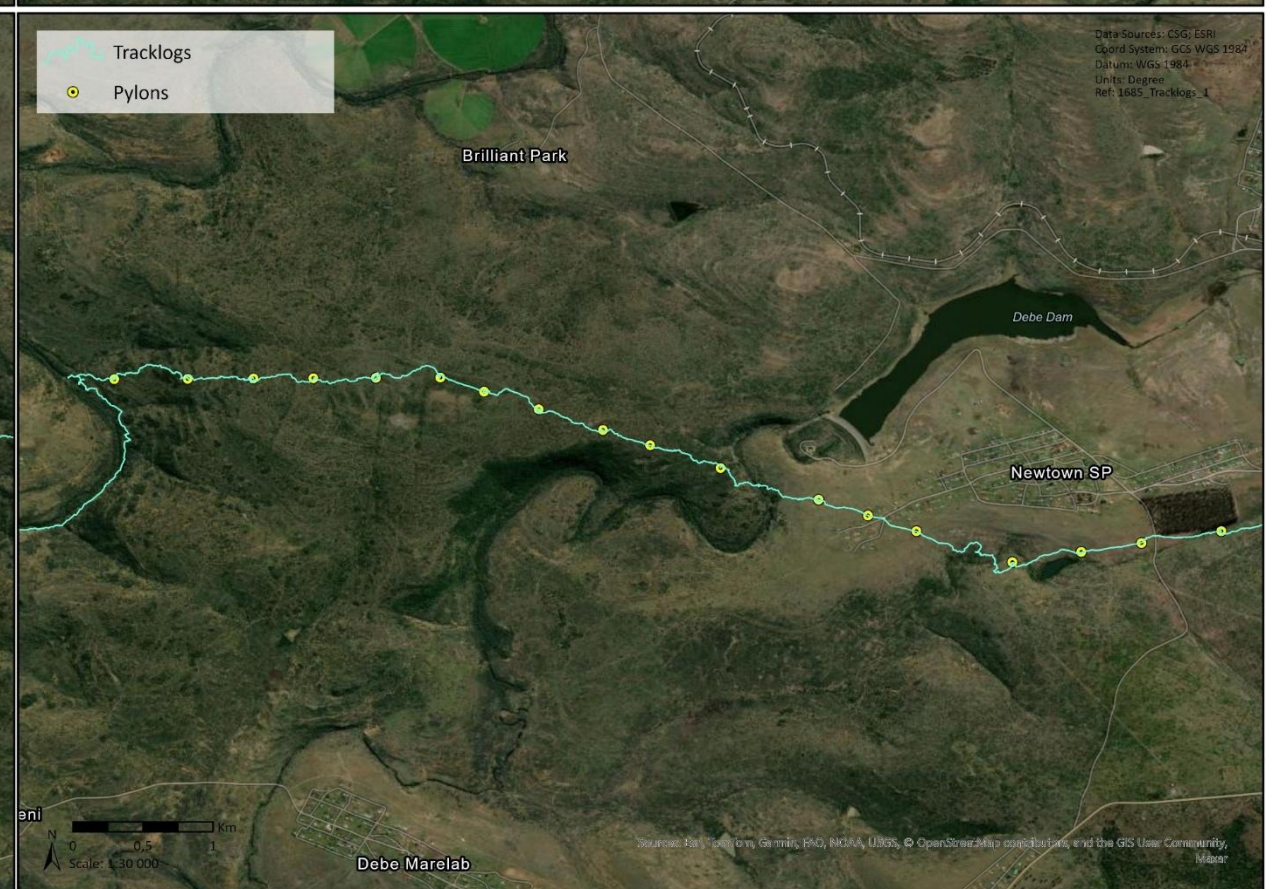
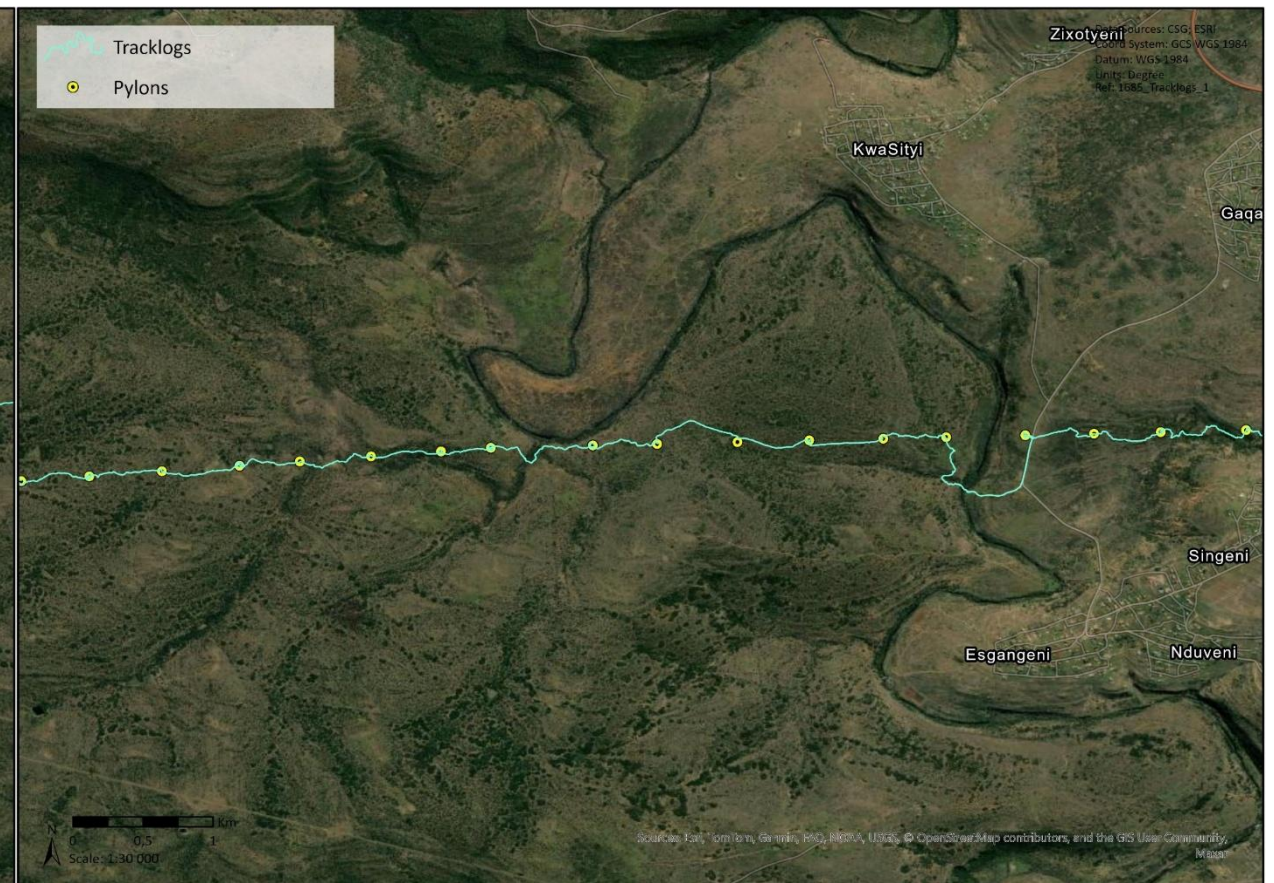
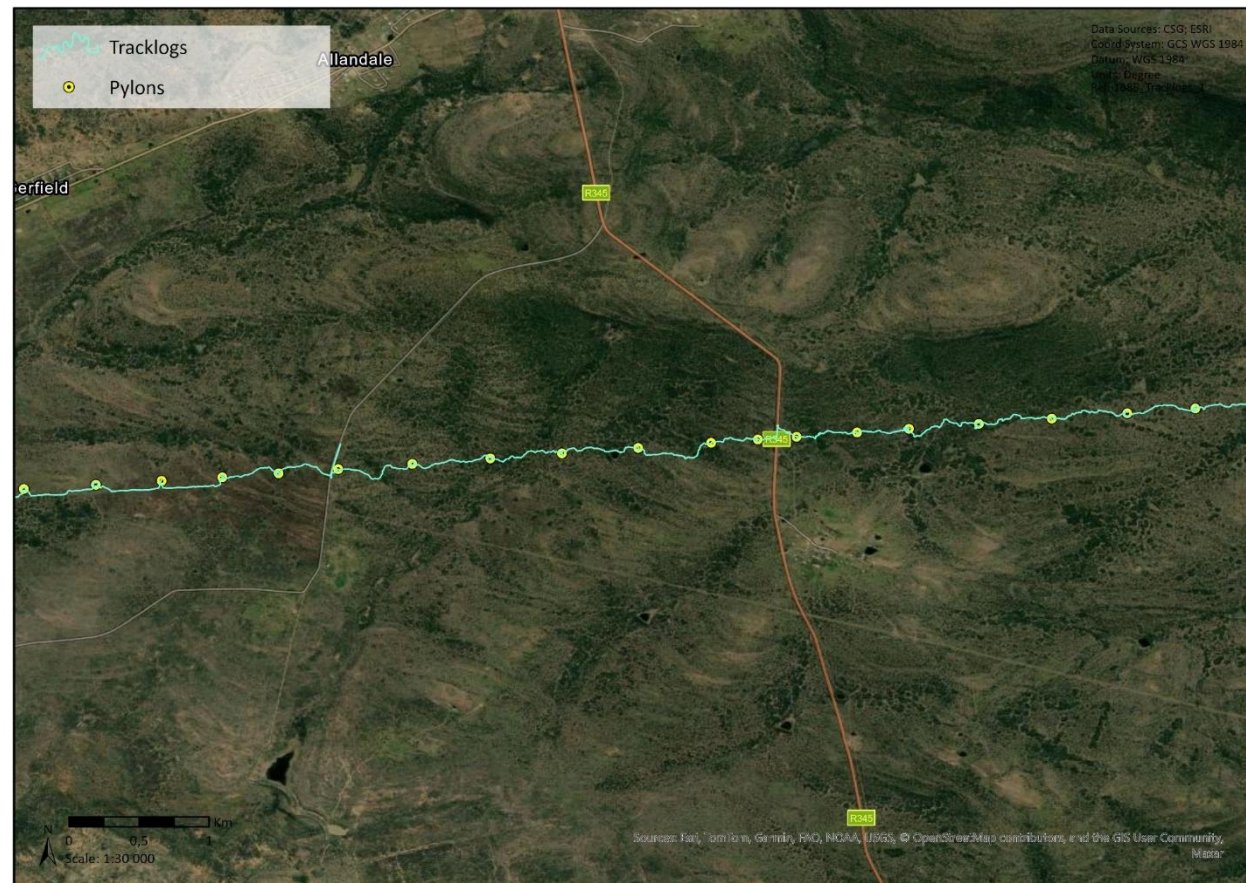
Appendix 3: Cartographic record/ maps of finds and sites

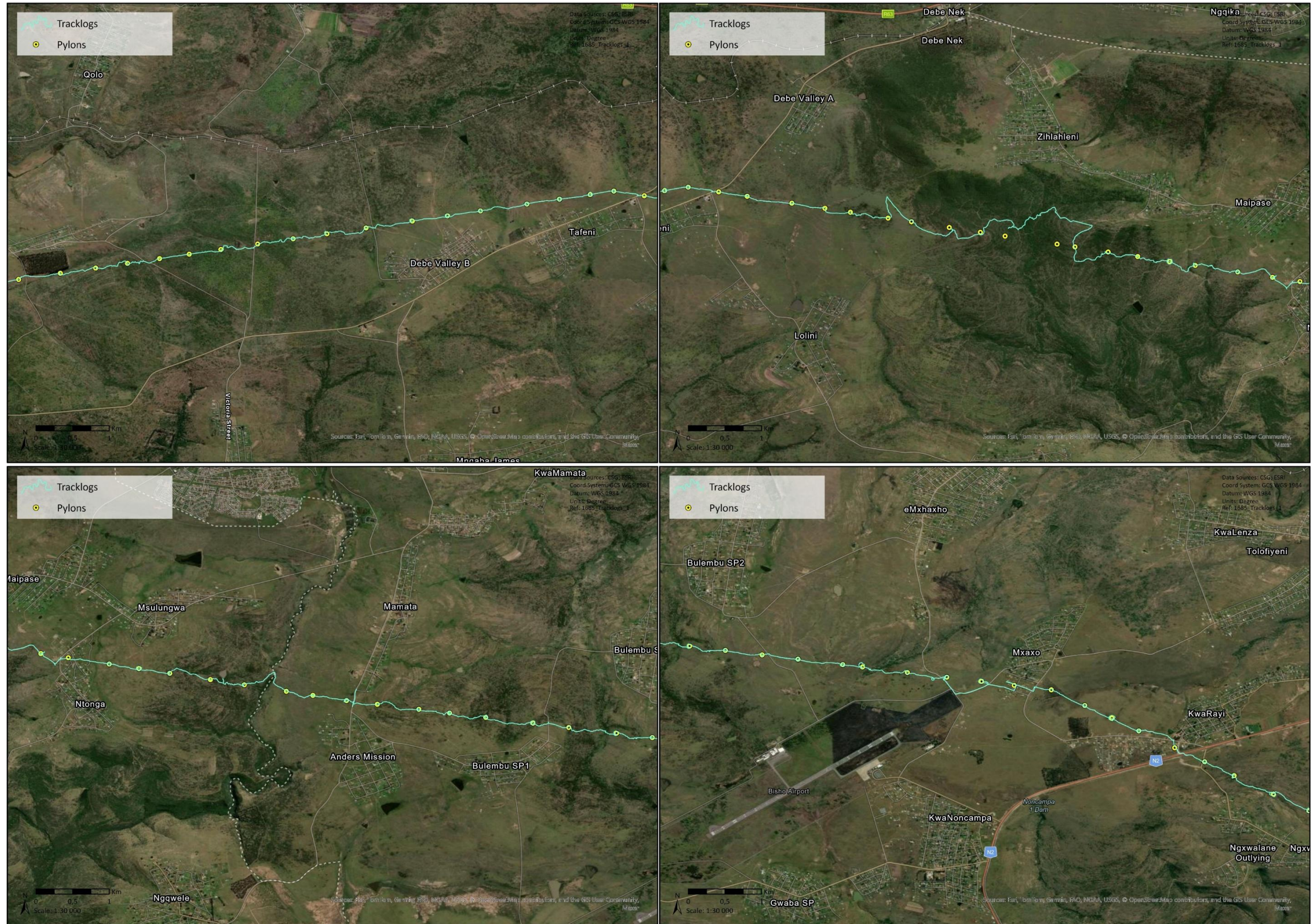
Section 1: Tracklogs across site







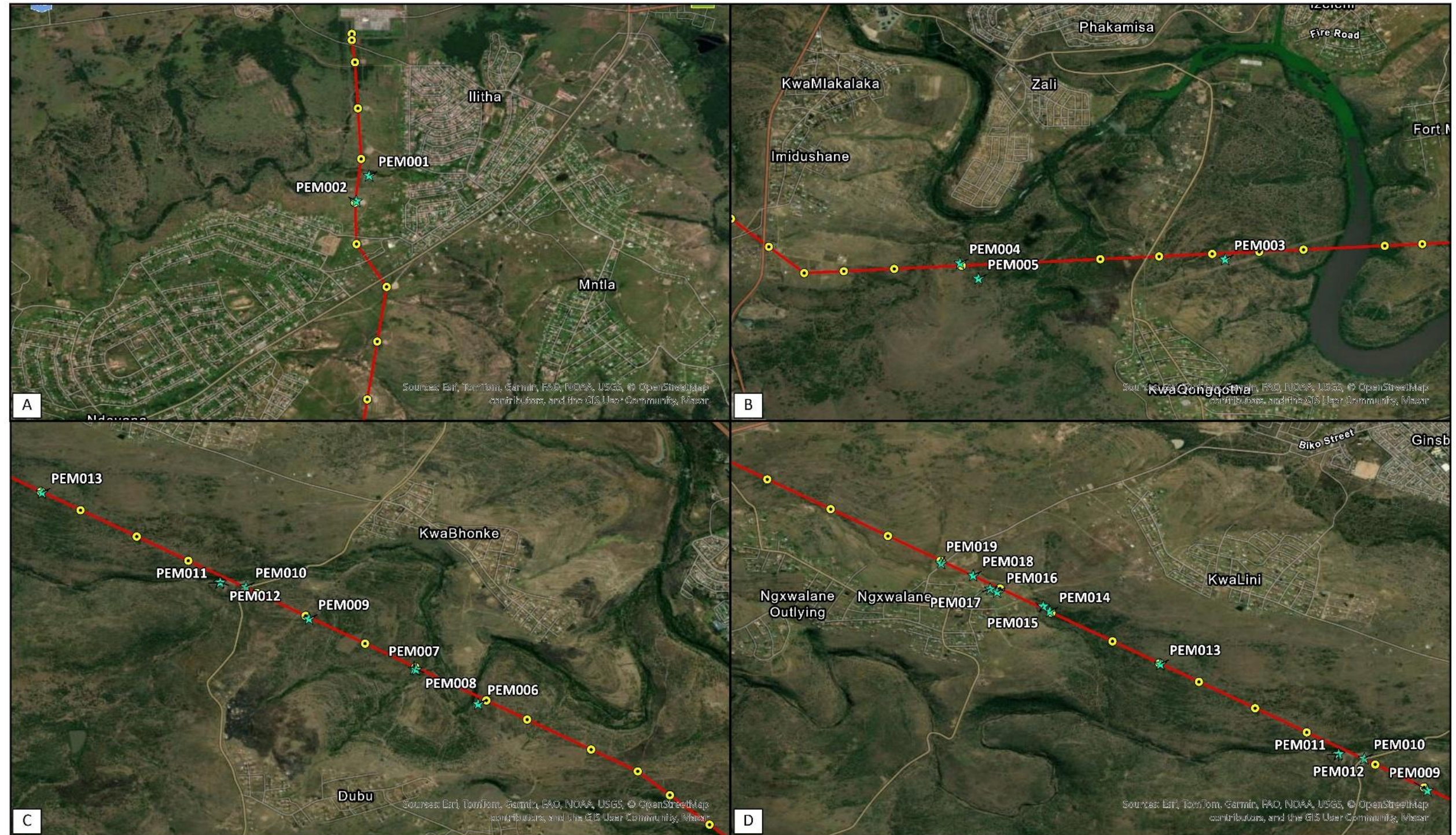








Section 2: Maps of identified heritage finds and sites



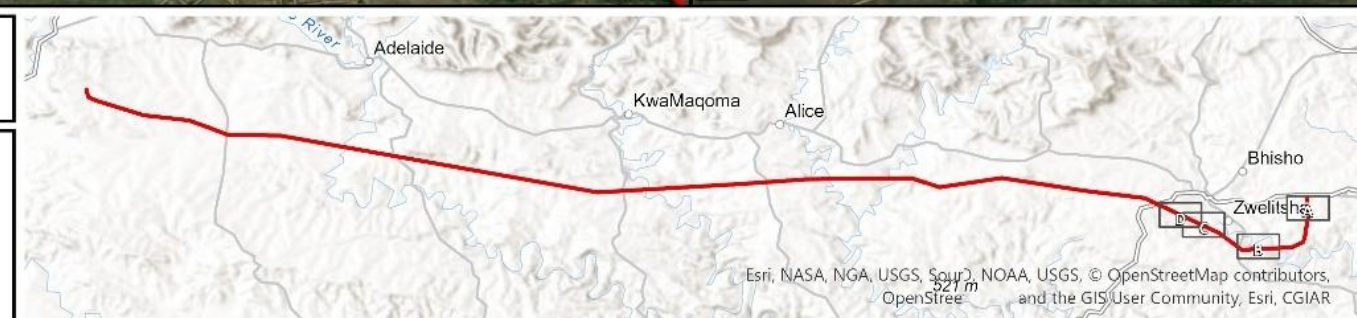
Heritage Finds
1685 NTCSA Pembroke Poseidon Walkdown

Legend

Pembroke Poseidon 400kV Line

Pylons

Finds and Sites



N

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Km

Scale: 1:30 000

Date: 2025/05/30

EIMS Ref: 1685

Compiled: JW

Reviewed: LJ

Approved: LW

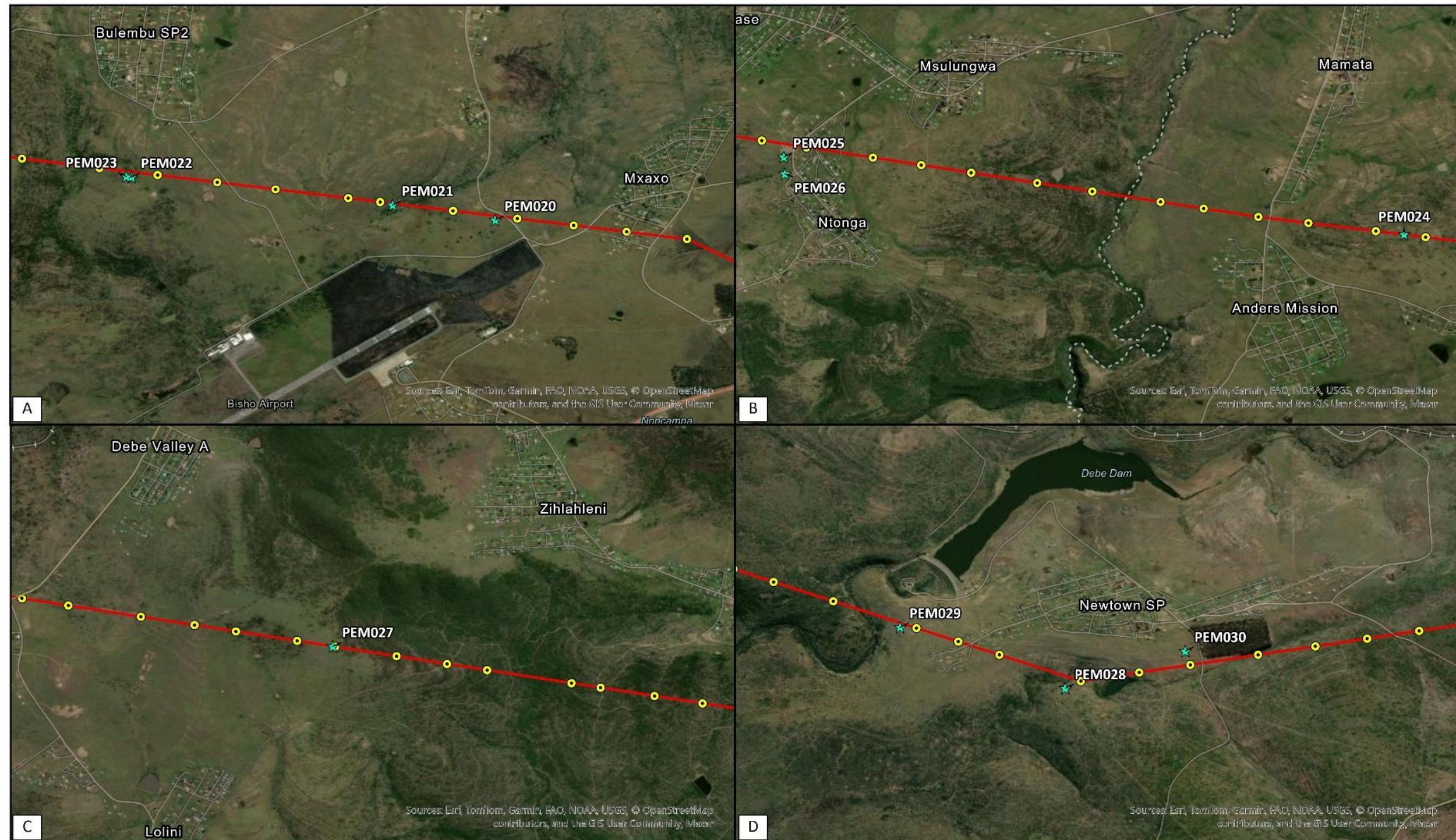
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Datum: WGS 1984

Units: Degree

Ref: 1685_Finds



Heritage Finds

1685 NTCSA Pembroke Poseidon Walkdown

Legend	
	Pembroke Poseidon 400kV Line
	Pylons
	Finds and Sites

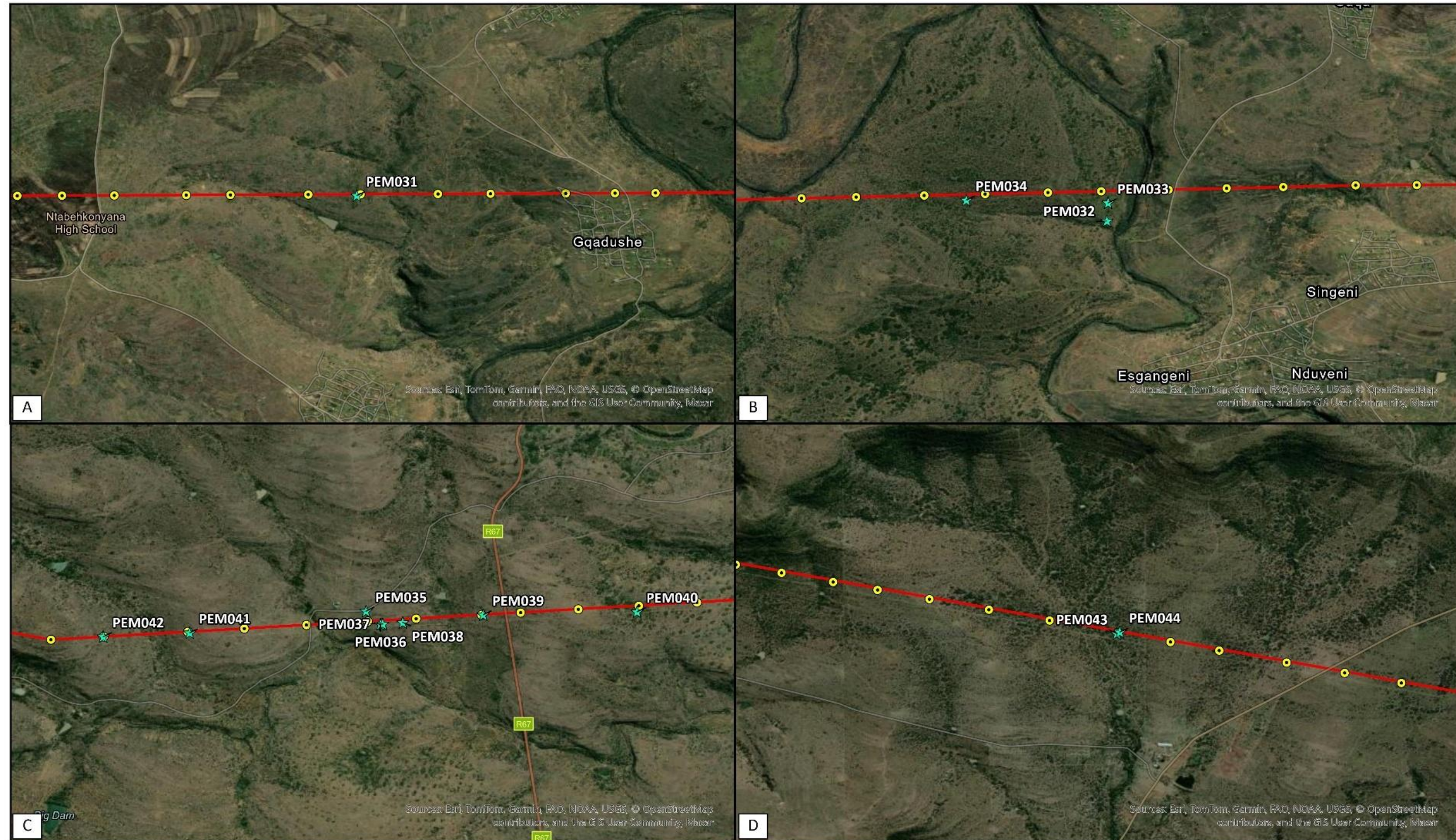
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Compiled: JW
Reviewed: LJ
Approved: LW

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Heritage Finds

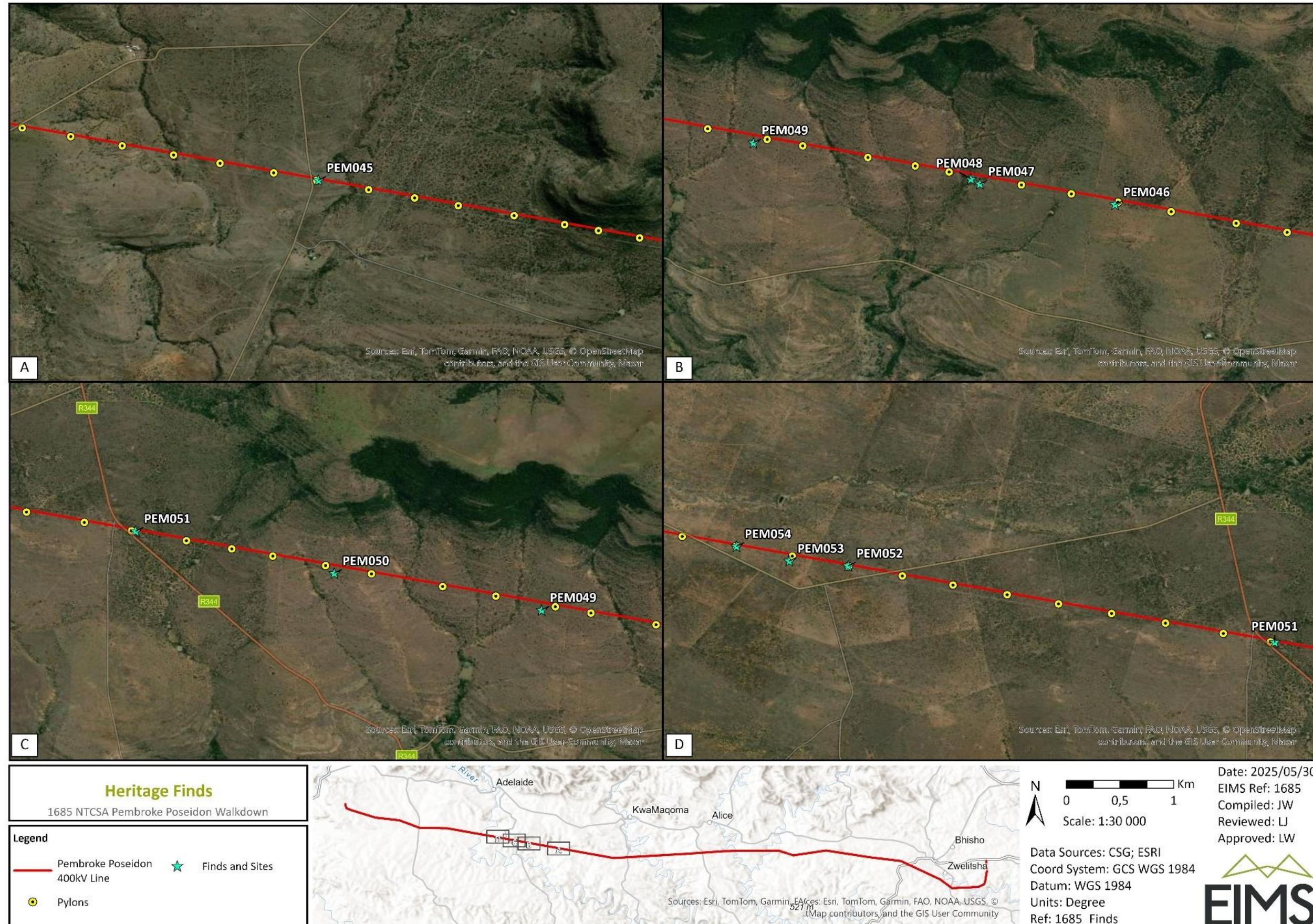
1685 NTCSA Pembroke Poseidon Walkdown

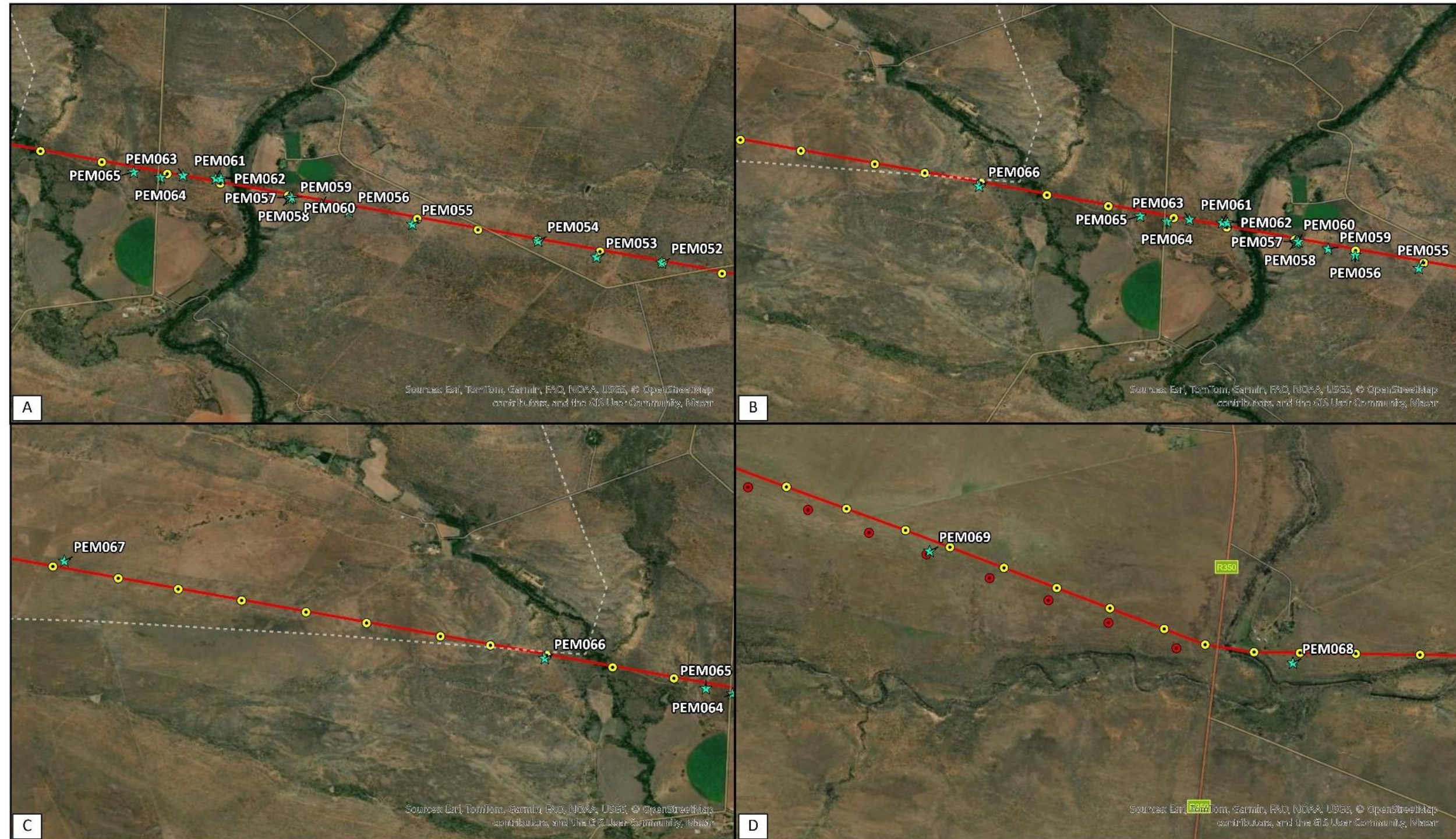
Legend	
Pembroke Poseidon 400kV Line	Finds and Sites
Pylons	

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Scale bar: 0, 0,5, 1 Km
North arrow: N

Data Sources: CSG; ESRI
Coord System: GCS WGS 1984
Datum: WGS 1984
Units: Degree
Ref: 1685_Finds

Date: 2025/05/30
EIMS Ref: 1685
Compiled: JW
Reviewed: LJ
Approved: LW





Heritage Finds

1685 NTCSA Pembroke Poseidon Walkdown

Legend	
Pembroke Poseidon 400kV Line	Pylon deviations
Pylons	Finds and Sites

N

0 0,5 1 Km

Scale: 1:30 000

Date: 2025/05/30
EIMS Ref: 1685
Compiled: JW
Reviewed: LJ
Approved: LW

Data Sources: CSG; ESRI
Coord System: GCS WGS 1984
Datum: WGS 1984
Units: Degree
Ref: 1685_Finds