



Heritage Officer
Archaeology, Palaeontology and Meteorites (APM) Unit
South African Heritage Resources Agency (SAHRA)
Case ID: 19147
Arcus Reference: 4675 DA2S WEF Associated Infrastructure

05 September 2022

Attention: Natasha Higgitt

RE: SAHRA INTERIM COMMENT
on the
PROPOSED DEVELOPMENT OF NEW TRANSMISSION LINES, A SWITCHING STATION,
AND ACCESS ROAD FOR THE AUTHORISED DE AAR 2 SOUTH WEF, NORTHERN CAPE
PROVINCE

Thank you for providing the interim comment, dated 24 August 2022, for the basic assessment process being followed for authorisation of the proposed development of New Transmission Lines, Switching Station and Access Roads, located approximately 15 to 26 km east of the town of De Aar, Northern Cape Province.

The SAHRA APM Unit has requested that an "*application specific field-based PIA be conducted as part of the EA process*". The comment further states that the field assessment may focus on previously unsurveyed sections of the proposed development located in areas of very high sensitivity formations, using previous field assessments (not older than 5 years) for the remaining section of the proposed route; and the report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

Dr Bamford's Palaeontological Impact Assessment (PIA) (2020) which formed part of the original Heritage Impact Assessment (HIA) for the Grid Connection was a desk-based assessment, the findings and recommendations of which SAHRA endorsed in Case ID: 15647 on the 30 April 2021. In her report, Dr Bamford noted that the grid connection route crossed areas of high palaeontological sensitivity, but referenced a number of previous field surveys by Dr John Almond for projects in the immediate vicinity. He found that in reality very few fossils were actually present in the high sensitivity areas shown on the SAHRIS palaeomap because the fossiliferous Permian sediments in this area are covered by sand and soil to a large extent.

Given that the previous PIA for the Grid Connection route has been accepted by SAHRA we have assumed that the field survey requested in the recent interim comment requires the palaeontologist to assess the proposed access road. The bulk of this road is routed over non-fossiliferous dolerite but a section of ~ 4 km (refer to Plate 1 of Appendix 1) crosses an area of palaeontological sensitivity.

The access road in question and the palaeontologically sensitive section of it was surveyed by ACO Associates when they conducted a site visit in July 2022. The survey found that the landscape in this portion of the road is a wide, shallow basin mantled in a thick layer of red Quaternary sand and although there is a good deal of archaeological material present on the surface, no evidence of fossil material was noted (refer to Plate 2 and 3 of Appendix 1).

Given the proven paucity of fossil material in those areas of the landscape around De Aar which are covered in the Quaternary sands, we ask SAHRA to consider that no palaeontological field assessment of the access road is required at this stage or the process. Instead, the final Basic Assessment (BA) Report and Environmental Management Programme (EMPr) will include a recommendation for a site survey to be conducted prior to construction and / or once the final design of the access road has been determined – as included for the archaeological resources.



Your consideration of this request and recommendation on the way forward would be much appreciated.

Yours Thankfully,

Ashlin Bodasing
Registered EAP
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APPENDIX 1



Plate 1: Proposed Access Road overlain by the paleo sensitivity. Light blue marker highlights a section of the proposed access road (pink line) which crosses an area of palaeontological sensitivity (approximately 4 km).



Plate 2: Photographic evidence taken during a site visit July 2022.



Plate 3: Photographic evidence taken during a site visit July 2022.