



CTS HERITAGE

Mr S. Mokhanya
ECPHRA
74 Alexandra Rd
King Williamstown
5600
15 August 2017

Dear Sello,

RE: APPLICATION MADE IN TERMS OF SECTION 38(1) FOR THE INSTALLATION OF HIGH FREQUENCY RADAR ON THE SOUTH COAST OF RSA: OUWERF.

The above application was discussed with you in an email dated 9 August 2017. The email indicated that the proposal is for the establishment of facilities for remote ocean monitoring on the farm Ouwerf (Klip Drift Oost 649 and Klip Drift 638) in the Tsitsikamma.

This proposal is brought to your attention because some of the antennae are placed in a row, which makes this a linear development exceeding 300m in length (i.r.o. section 38(1) of the NHRA which requires that a notification of intent to develop be submitted under this circumstance). It is important to note that this installation has a very small footprint, very low impact and is temporary.

In addition, it is important to note that the radar system will have a “disturbance footprint” compatible with existing farm infrastructure in that:

- existing roads and tracks would be used for access;
- the antennae would be secured by wooden fence poles of the same type as already used on the farm;
- the antennae would be spaced about 28 m apart so movement of farm machinery or animals would not be restricted;
- cabling would be unobtrusive as it would be buried in areas trampled by cattle and otherwise fed on the surface between plants and rocks or along existing fence-lines;

In addition, it is important to note that the area proposed for this installation has been extensively previously disturbed by agricultural activities.

With regard to palaeontology, the study area is known to include areas of high fossil sensitivity, however a field assessment is unlikely to add anything of significance to what we already know of the area proposed for the installation. As the proposed installation will require very limited excavations, the likelihood of significant archaeological, palaeontological or built environment heritage resources is VERY LOW to NON-EXISTENT.

In terms of the process outlined in section 38(1) and (2), should a proposed development trigger section 38(1), the responsible heritage resources authority must then determine if there is reason to

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believe that heritage resources will be affected by such development. If heritage resources are likely to be impacted, the heritage authority must notify the person who intends to undertake the development to submit an impact assessment report (section 38(2)a). Alternatively, if it is unlikely that heritage resources will be impacted, the heritage authority must notify the person concerned that this section does not apply (section 38(2)b). In our professional opinion, section 38 does not apply.

For these reasons, CTS Heritage requests that ECPHRA reconsider their request for an HIA and indicate that no further heritage studies are required in this instance. Please find attached Heritage Screener in support of this opinion.

Please feel free to contact us should you have any queries or concerns in this regard. We look forward to a response at your earliest convenience.

Kind regards

Jenna Lavin

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