



ASHA Consulting (Pty) Ltd
40 Brassie Street
Lakeside
7945

15 April 2020

Ms Natasha Higgit
SAHRA
P.O. Box 4637
Cape Town
8001

RE: INTERIM COMMENTS FOR KENHARDT PV4 (CASE 14914), PV5 (CASE 14909) AND PV6 (CASE 14912)

Dear Natasha

This letter serves to respond to the interim comments issued on the above projects by SAHRA and dated 23 March 2020. It is noted that the Heritage Impact Assessments (HIAs) were rejected due to the lack of new fieldwork to inform the reporting. The reason given was that erosion in the intervening four years between the 2015 survey and 2019 report may have exposed further heritage resources. This response argues that the requirement for new fieldwork should be reversed and final comments should be issued for the projects.

The farm portion (Onder Rugzeer 168/RE) was surveyed in full in 2015 in order to inform the assessment of three solar energy facilities proposed at that time (Kenhardt PV1, PV2 and PV3 – i.e. Phase 1). The proposed Kenhardt PV4, PV5 and PV6 facilities are located wholly within the area that was surveyed in 2015 as part of Phase 1. The Kenhardt PV1, PV2 and PV3 facilities were located in areas with minimal impacts. Using those same survey results, the three newly proposed solar energy facilities (i.e. Kenhardt PV4, PV5 and PV6) were similarly sited in low sensitivity areas. It is my firm belief that because of the very low overall archaeological sensitivity of the three sites, and indeed the wider region, a further survey would have added very little, if anything, to the existing data. Only isolated artefacts are likely to have been found in the spaces between the previous survey tracks. My reasoning for this statement is as follows:

- It is notable that this part of Bushmanland is a very slowly eroding landscape rather than an accretionary one which means that nothing is ever likely to get buried except perhaps in pans – there are none in the study area though.
- According to Dr John Almond the landscape has been fairly stable since the Cretaceous Period (145 to 66 million years ago), since crater lake deposits of that age are preserved at the surface which suggests the surface to be largely at least 66 million years old (i.e. erosion of the surrounding landscape has been so minimal that it has failed to bury these deposits in all that time).
- This stability is obvious from the many bedrock exposures and swathes of gravel present in the study area, and especially from the resistant quartz which, when it eventually breaks up, spreads itself over the surface. There are also extensive areas of fine gravel which show that wind action removing fine dust particles is likely the primary agent of erosion.
- In this geological context, the wide age range of the artefacts found lying on the surface also attests to its long term stability. These artefacts include Early Stone Age materials dating from more than 200 000 years ago along with Middle Stone Age, Later Stone Age and historical items. These finds show that even ESA populations were living on much the same surface as visible today.

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- Erosion is therefore EXTREMELY slow and four years will make no difference at all to the surface visibility of archaeological materials.
- I have done a large number of surveys in the Kenhardt area and am well-familiar with the types of archaeological occurrences typically found in the region. Significant sites are extremely rare and are typically associated with pans, rocky hills or larger water courses. The existing recommendations have covered this eventuality by requiring pre-construction surveys of these areas (i.e. the one pan in the grid corridor and the water courses in the PV sites).

For the above reasons it is hereby requested that SAHRA reverse the need for new fieldwork and issue final comments for these three projects with the knowledge that pre-construction surveys focused on the most sensitive parts of the landscape will be undertaken.

I respectfully request that a revised final comment is provided to the project team by 8 May 2020 or as soon as possible thereafter to allow for enough time to update, print and submit the BAR to the Competent Authority (official deadline is 3 June 2020).

Should you wish to discuss this further, please do not hesitate to contact the undersigned and the CSIR Project Team (copied on this correspondence).

Yours sincerely



Jayson Orton

Copies to:

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