



**ASHA Consulting (Pty) Ltd**  
40 Brassie Street  
Lakeside  
7945

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Natasha Higgitt  
**SAHRA**  
P.O. Box 4637  
Cape Town  
8001

**PROPOSED VHUVHILI GRID CONNECTION: RESPONSE TO SAHRA INTERIM COMMENT  
CASE ID: 20125**

Dear Natasha

Thank you for supplying the interim comment regarding the above project. The heritage team wishes to respond to the comment as below and request that a final comment be issued for the project.

Impact assessment process

It is required that specialists establish the likelihood of impacts occurring with a reasonable degree of confidence. While it is true that the currently proposed powerline route was not specifically surveyed, there is more than enough information available from adjacent surveys (which covered parts of the powerline corridor) and historical and modern aerial photography to (1) confirm the sensitivity, (2) predict the significance of impacts and (3) devise appropriate mitigation measures, all with a high degree of confidence. It is argued here that the requirements of the impact assessment process have been met.

Archaeology

The landscape is flat and sandy with no rock outcrops. While it is true that isolated rocks do occur on the surface in places (see Figure 4 of the HIA report), there is far too little rock for any sort of construction which means that prior to historical transport methods (ox wagons) it was not possible to obtain enough stone for building. This, effectively, precludes the presence of Iron Age stone-walled sites. Historical stone-walled sites are visible on historical or modern aerial photography (as demonstrated in the HIA report) and relevant sites in the unsurveyed section were listed. The southern part of the powerline runs along a road (which was driven during the Mukondeleli WEF survey) and is often within ploughed land. Archaeological materials will not be present in ploughed areas. The remaining distance for which a pre-construction survey of the final, approved alignment was recommended totals about 5 km long. Surveying that area now would be pointless due to the very large amount of rainfall the area has received. One of us (JvdW) was in the immediate area last week and access was found to be challenging due to excessive mud. In addition, the grass in the area is currently very dense with some areas rowing to waist height which means that, even if dry, a survey would be unlikely to find anything at ground level (Figures 1 to 3). Accordingly, the assertion that a survey of the

**ASHA Consulting (Pty) Ltd**

Reg. no.: 2013/220482/07 | Directors: Jayson Orton & Carol Orton  
40 Brassie Street, Lakeside, 7945 | T: 021 788 1025 | C: 083 272 3225  
Jayson@asha-consulting.co.za | Carol@asha-consulting.co.za | www.asha-consulting.co.za

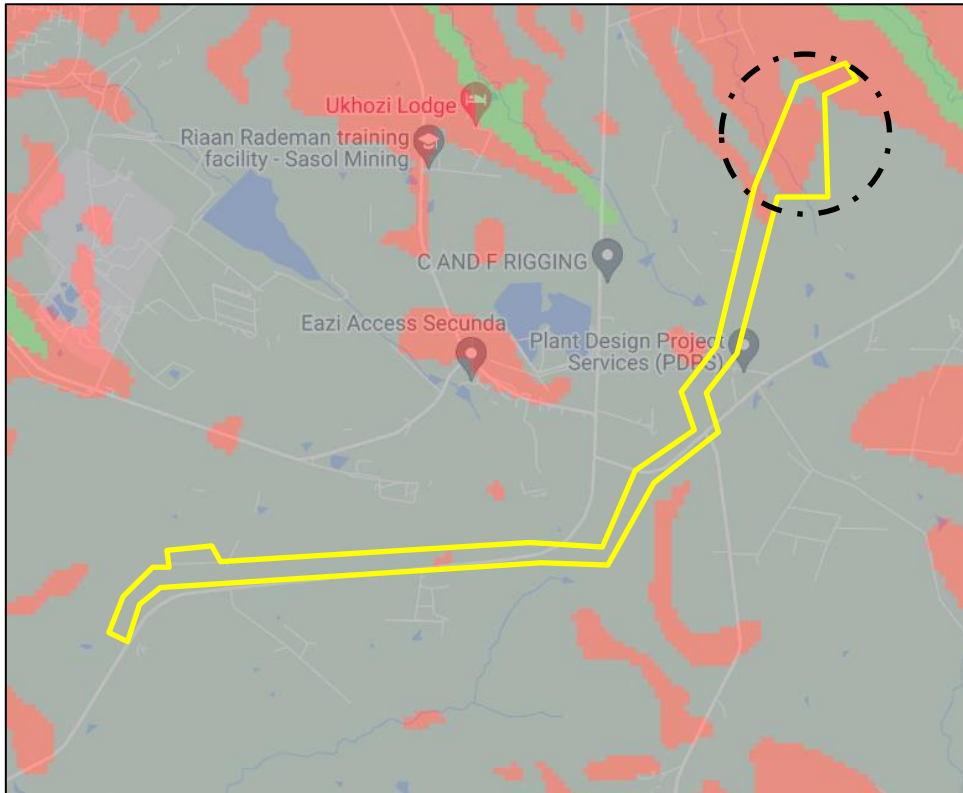
final approved alignment should be undertaken remains our recommendation. Such a survey will be able to focus on the actual line rather than the entire corridor and alternatives.



**Figures 1 to 3:** Photographs showing the current condition of the landscape in areas a few tens of km to the northeast of Secunda.

### Palaeontology

As shown by the SAHRIS Palaeosensitivity map (Figure 4), almost the entire site lies over geology of zero sensitivity which requires no assessment. This is Jurassic dolerite. The very small section in the northeast lies within the area of the proposed Vhuvhili PV project which has been approved by SAHRA. The same comment was raised by SAHRA for that project but, based on the complete lack of rock outcrops on the sandy surface with estimated palaeosensitivity being based solely on drill cores, SAHRA accepted that a specialist field survey was pointless. Given that the relevant area was assessed in the Vhuvhili PV reporting there seems no reason for SAHRA to offer a different opinion now.




**Figure 4:** SAHRIS Palaeosensitivity map showing the sensitivity based on geology to be zero over almost all of the project area. The remaining portion (inside black dashed circle) lies within the Vhuvhili PV project site which has already been approved by SAHRA.

Conclusion

Based on the arguments above, we would like to request that SAHRA accept the recommendations in the HIA and palaeontological specialist study and issue a final comment for this project. Should SAHRA which to add a stipulation that the archaeological pre-construction survey must be undertaken during the dry season then that is completely acceptable and would certainly add value.

Yours sincerely

  
Jayson Orton

  
Jaco van der Walt

  
Marion Bamford