

Our Ref:



an agency of the  
Department of Arts and Culture

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CaseID: 13463

Date: Friday May 24, 2019  
Page No: 1

## Interim Comment

**In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: South Africa Mainstream Renewable Power Developments (Pty) Ltd

P.O. Box 45063  
Claremont  
7753

**South African Mainstream Renewable Power (Pty) Ltd, is proposing the development of an access road for the authorised Dwarsrug Wind Energy Facility (WEF), Northern Cape Province. The applicant is proposing two alternative access roads which will be assessed, including: » Alternative 1 - Gravel road from Granaatboskolk to the project site (approx. 11km); and » Alternative 2 - Gravel road from Granaatboskolk to the project site (approx. 8km). Project Location: The proposed access road is approximately 60km north of Loeriesfontein, in the Northern Cape Province. The proposed access road will fall within the jurisdiction of the Hantam Local Municipality and within the greater Namakwa District Municipality. The affected properties will include the following: » Remainder of the Farm Brakpan No. 212; » Stinkputs No. 229 » Portion 1 of the Farm Aan de Karee Doorn Pan No. 213 » Remainder of the Farm Sous No. 226 » Narosies No. 228**

Savannah Environmental has been appointed by South Africa Mainstream Renewable Power Developments (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Dwarsrug Access Road, near Loeriesfontein, Northern Cape Province.

A draft Basic Assessment Report (BAR) process has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development includes the construction of a gravel road from the existing Granaatboskolk road to the authorised Dwarsrug WEF. Two alternatives are being considered i.e. 11 km or 8 km.

PGS Heritage (Pty) Ltd has been appointed to provide specialist heritage input as part of the BAR process in terms of section 38(8) of the National Heritage Resources Act, No 25 of 1999 (NHRA).

*Smeyatsky, I. 2019. Heritage Impact Assessment: Proposed construction of an access road for the Dwarsrug Wind Farm, near Loeriesfontein, Northern Cape Province.*

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A total of two (2) heritage resources were identified within the proposed development footprint. These include low density find spots of Stone Age lithics of low heritage significance.

The report cites a Palaeontological Impact Assessment conducted in 2014 which found that the proposed development footprint is underlain by the Tierberg Formation and the Whitehill Formation (Ecca Group, Karoo Supergroup). Fossils located within the Tierberg Formation include event beds and trace fossils. Known fossils from the Whitehill Formation include trace fossils, aquatic reptiles, rare cephalochordates, palaeoniscoid fish, eocarid crustaceans, insects, palynomorphs, petrified wood and vascular plant remains. Large areas are covered in dolerite scree while small areas are covered by Quaternary aged alluvium and pan sediments. No fossils are located within the dolerite, and recent fossils are known to be found in the Quaternary alluvium.

Recommendations provided in the report include the following:

- Develop a chance finds protocol for the mitigation of possible heritage finds, to be implemented as part of the EMP for the construction phase of the project;
- If any artefacts are identified during construction the chance finds protocol must be implemented;
- The EAP as well as the ECO for this project must be made aware of the fact that the Ecca Group sediments contains significant fossil remains, albeit mostly trace fossil assemblages. Several types of fossils have been recorded from this Group in the Karoo Basin of South Africa, with special mention of the very important Whitehill Formation. The Whitehill Formation outcrops are however very restricted in this study area;
- In areas that are allocated a Very High and High Palaeontological sensitivity and specifically where deep excavation into bedrock is envisaged (following the geotechnical investigation), or where fossils are recorded during the geotechnical investigations, a qualified palaeontologist must be appointed to assess and record fossils at specific footprints of infrastructure developments (Phase 1 PIA);
- If significant fossil finds (e.g. vertebrate teeth, bones, burrows, petrified wood) are recorded during excavations for infrastructure such as road developments, the palaeontologist must apply for a collection permit to collect the fossils according to the SAHRA specifications;
- These recommendations should form part of the EMP of the project.

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The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the 2014 Palaeontological Assessment referenced in the HIA to be uploaded to the case for review.

Further comments will be issued upon receipt of the above.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

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Natasha Higgitt  
Heritage Officer  
South African Heritage Resources Agency

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Phillip Hine  
Acting Manager: Archaeology, Palaeontology and Meteorites Unit  
South African Heritage Resources Agency

**ADMIN:**

Direct URL to case: <http://www.sahra.org.za/node/520939>  
(DENC, Ref: )