

# Proposed Development of the Wag 'n Bietjie infrastructure associated with the authorised PV Facilities near De Aar

Our Ref:



an agency of the  
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town  
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Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
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CaseID: 17776

Date: Tuesday September 06, 2022  
Page No: 1

## Final Comment

**In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)**

Attention: MTS Wag 'n Bietjie (Pty) Ltd

### **Project components and areas for assessment MTS Loop in Loop Out lines connecting the new MTS to an existing 400kV power line A grid connection that connect the Wag 'n Bietjie MTS and the Vetlaagte MTS**

Landscape Dynamics has been appointed by Mulilo Renewable Project Developments (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed development of electrical infrastructure for the approved (EA has lapsed) solar facilities on the Wag 'n Bietjie Farm, near De Aar, Northern Cape Province.

A Basic Assessment process will be followed in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations. The proposed activities include the construction of new 400kV main transmission substation, loop in loop out lines, a 132kV powerline to connect the Wag 'n Bietjie MTS and the Vetlaagte MTS, and a 200 m corridor will be assessed as part of the EA.

CTS Heritage has been appointed to provide heritage specialist input into the EA process as per section 24(4)b(iii) of the NEMA and section 38(3) and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Lavin, J. 2021. Desktop Heritage Screening Assessment: Proposed Development of the Wag 'n Bietjie infrastructure associated with the authorised PV Facilities near De Aar*

The desktop heritage screener notes that heritage resources such as Middle Stone Age (MSA) tools, historical farmstead and graveyards have been identified in the surrounding areas. The surrounding area is underlain by potentially fossiliferous sediments of the Ecca and Lower Beaufort Groups along with unfossiliferous Jurassic dolerite. The area is overlain with a thick layer of superficial deposits, and palaeontological resources have been identified in the adjacent farms.

The heritage screener concludes that a Heritage Impact Assessment be completed for the proposed development.



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In an Interim Comment issued on the 10/02/2022, SAHRA noted the pending HIA. Since the issuing of the Interim Comment, an HIA and the draft BAR have been submitted for review (11/07/2022).

*Lavin, J. 2022. Heritage Impact Assessment in terms of Section 38(8) of the NHRA for the Proposed Development of the Wag n Bietjie infrastructure associated with the authorised PV Facilities near De Aar.*

The HIA used the results of two heritage specialist reports to provide the following recommendations:

- Alternative 1 for the MTS is preferred from a heritage perspective;
- A no-go development buffer of 30m is implemented around Site 004 and a no-go development buffer of 100m is implemented around Site 014. These sites and their respective buffers should be indicated on site development maps during the construction phase of the project. Furthermore, during the operational phase of the projects, relevant staff the facility should be made aware of these sites and proper training provided regarding appropriate behaviour at archaeological sites;
- The attached Chance Fossil Finds Procedure is implemented for the duration of construction activities ;
- Should any buried archaeological resources or human remains or burials be uncovered during the course of development activities, work must cease in the vicinity of these finds. The South African Heritage Resources Agency (SAHRA) must be contacted immediately in order to determine an appropriate way forward.

The results of the heritage specialist reports are summarised below:

*Bamford, M. 2021. Palaeontological Impact Assessment for the proposed development of the Vetlaagte and Wag 'n Bietjie infrastructure associated with the authorised PV Facilities near De Aar, Northern Cape Province*

The proposed development is underlain by non-fossiliferous Jurassic dolerite, highly sensitive Tierberg Formation that may contain plants and silicified wood fragments, highly sensitive Adelaide Subgroup that may contain possible vertebrate bones and moderately sensitive Quaternary alluvium. Fossils would be sporadic and not very significant.

*Lavin, J. & Wiltshire, N. 2021. Archaeological Specialist Study in terms of Section 38(8) of the NHRA for a Proposed Development of the Wag n Bietjie infrastructure associated with the authorised PV Facilities near De Aar.*



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A total of 25 heritage resources were identified within the proposed development footprint. These include surface scatters of Stone Age lithics of low heritage significance, one site of Grade IIIC heritage significance (Site 004: Still Bay point and burnt bone at site) and one of Grade IIIB heritage significance (Site 014: LSA and MSA lithics with pottery).

In an Interim Comment issued on the 29/07/2022, SAHRA requested that a field-based PIA be completed as part of the EA application, as previously requested. Since the issuing of the Interim Comment, a response to the comment has been uploaded to the case.

*Bamford, M. 2022. Palaeo Field Report Exemption Letter - Wag n Bietjie MTS*

The specialist states that very few fossils were identified on the adjacent property and the Endothiodon and Tapinocephalus Assemblage Zones occur some distance from the proposed development footprint. The specialist notes that the development footprint ie. Powerline poles will be small.

In an Interim Comment issued on the 15/08/2022, SAHRA again requested that a field-based PIA be conducted as part of the EA process on the following grounds:

- The development footprint of the current application (as per the description in the BAR) includes the powerline corridors, Main Transmission Substation (MTS), MTS access road to be widened, powerline access roads to be constructed, and a laydown area of 14 ha. This impact footprint is not small as stated by the specialist in the latest letter;
- As per the Heritage Screener and HIA submitted, only the adjacent property for the Vetlaagte has been previously surveyed and the survey coverage of the current application area is mostly low, thus the current status of potential surface exposures is uncertain;
- The PIA states on page 14 that “based on the nature of the project, surface activities may impact upon the fossil heritage of preserved in the development footprint. The geological structures suggest that the rocks are the correct type and age to contain fossils”.

Since the issuing of the Interim Comment, a field-based PIA has been submitted for review.

*Butler, E. 2022. Palaeontological Impact Assessment: Wag n' Bietjie Infrastructure.*

Trace fossils were identified as part of the field-based PIA. These include weathered ripple trace fossils of low

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Page No: 4

heritage significance.

The following recommendations were include in the report:

- The Environmental Control Officer (ECO), responsible for the development, should be aware of the possibility of finding fossils in the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) as well as in the Tierberg Formation (Ecca Group Karoo Supergroup). Quaternary fossil assemblages are normally rare and low in diversity and occur over a wide-ranging geographic area;
- A Chance Find Protocol must be implemented;
- Before any fossil material can be collected from the development site, the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet the minimum standards for palaeontological impact studies proposed by SAHRA (2012). It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

## Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
- If it is not possible to adhere to the recommended buffers around the identified sites, permits in terms of section 35(4) of the NHRA must be applied for from SAHRA in order to mitigate the sites. Permit applications must be submitted prior to the construction phase and no mitigation may occur without permits issued in this regard;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section

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Page No: 5

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51(1)e of the NHRA and item 5 of the Schedule;

- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/ Ngqabutho Madida 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51 of the NHRA regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
- The Final BAR and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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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Page No: 6

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

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## ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/591016>

## Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.