



an agency of the
Department of Arts and Culture

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CaseID: 18901

Date: Friday August 19, 2022
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Interim Comment

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

Attention: Maralla West Wind (RF) (Pty) Ltd

Maralla proposes to investigate an alternative overhead powerline (OHPL) option which entails the construction of a 132 kV transmission line from the common substation at the proposed Maralla WEF to connect to the existing Karusa substation

WSP Group Africa Proprietary Limited (WSP) has been appointed by Maralla West Wind (RF) (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed development of a 132kV Transmission Line near Sutherland, Northern Cape Province.

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the Environmental Impact Assessment (EIA) Regulations. The proposed activities include the construction of new 132kV powerline (4.5 km long and 200 m wide) from the common substation at the proposed Maralla Wind Energy Facility (WEF) to connect to the existing Karusa Substation, with a servitude of 36 – 40 m and possible access tracks, temporary site camp with temporary offices, laydown areas, storage facilities and parking area, and new on-site substation within the authorised Maralla WEF. It is noted that Maralla received an EA for the proposed powerline in 2017 (Ref: 14/12/16/3/3/2/1774), however, an alternative powerline is now being assessed. SAHRIS Case ID 11394

(<https://sahris.sahra.org.za/cases/maralla-transmission-integration>) has reference. In an Interim Comment issued on the 16/08/2017, SAHRA requested that a field-based PIA be conducted as part of the project, and this has yet to be completed. No Final Comment has been issued by SAHRA with regards to the original EA application.

Natura Viva CC and ACO Associates CC 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).

Almond, J. E. 2021. Proposed 132 kV Transmission Integration Project for the Maralla West & Maralla East Wind Energy Facilities near Sutherland, Sutherland Magisterial District, Northern Cape: Palaeontological Heritage Basic Assessment.



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The proposed development footprint is underlain by the Abrahamskraal Formation which is covered by Late Caenozoic superficial sediments that are not usually fossiliferous. The Abrahamskraal Formation is known to contain scientifically important fossils of petrified wood and other vascular plants, tetrapod and lungfish burrows, trackways and exceedingly rare remains of the *Tapinocephalus* Assemblage Zone. None of the known fossil sites are located within the powerline route options under consideration.

It must be noted that the PIA only assessed Options 1A, 1B and 2A. Options 4, A and B as described in the DBAR were not assessed.

Recommendations provided in the report include the following:

- Monitoring of all surface clearance and substantial excavations (>1 m deep) by the ECO / ESO for fossil material (e.g. bones, teeth, fossil wood) on an on-going basis during the construction phase;
- The implementation of a Chance Fossils Finds Protocol.

Gribble, J. 2022. Heritage Impact Assessment: Proposed Maralla 132kV Transmission Integration Project, on Farms Drie Roode Heuwels 180, Oranje Fontein 203, Kentucky 206 and De Hoop 202, Northern Cape.

A total of 31 heritage resources are located within the proposed powerline route options. These include Stone Age lithic scatters of low, low-medium and medium-high heritage significance, stone packed kraals of low and medium heritage significance, stone structures of low and medium heritage significance, stone quarries of low heritage significance, and stone cairns of low heritage significance.

Recommendations provided in the report include the following:

- The Option A Line, Option B Line or Option 2(A) routes are the preferred OHL alignments in respect of heritage resources;
- Once the final OHL option has been selected, it is recommended that a walk-down of the route is undertaken to verify that the pylons and access road will not damage archaeological sites, element of the historical built environment or any identifiable cemeteries or graves. Micro-siting of pylons and the service road alignment may be required to ensure that significant heritage resources are not damaged;
- A Chance Finds Procedure is recommended to be implemented.

In an Interim Comment issued on the 12/08/2022, SAHRA requested that the PIA be revised to assess

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powerline options 4, A and B. The revised PIA must include a field work survey of the outstanding powerline options. Since the issuing of the comment, the Final BAR has been submitted included a Public Participation report. SAHRA comments have not yet been addressed.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that the Interim Comment issued on the 12/08/2022 be addressed prior to the submission of the Final BAR to the competent authority as the assessment of the impact of the development to palaeontological resources is incomplete.

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

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/599875>

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(DEA, Ref:)