

# New Transmission Lines, Switching Station and Access Road for the Authorised De Aar 2 South WEF, near De Aar in the Northern Cape Province

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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CaseID: 19147

Date: Wednesday November 02, 2022  
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## Final Comment

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

Attention: Mulilo De Aar 2 South (Pty) Ltd

**A basic assessment process is being followed for environmental authorisation (EA). The EA is being applied for the proposed development of New Transmission Lines, Switching Station and Access Roads, located approximately 15 to 26 km east of the town of De Aar, Northern Cape Province.**

Arcus Consultancy Services South Africa (Pty) Ltd have been appointed by Mulilo De Aar 2 South (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed new transmission lines, a switching station and roads in support of the authorised De Aar 2 South Wind Energy Facility, Northern Cape Province.

A draft Basic Assessment Report (DBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations. The proposed activities include the construction of a 132KV transmission line approximately 20 or 23 km long within a 300 m wide corridor, laydown areas, Operation and Maintenance buildings, service and access roads, upgrades of the Main Transmission Substation, and Switching station.

ACO Associates CC have 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).

*Gribble, J and Euston-Brown, G. 2022. Heritage Impact Assessment: Two New Transmission Lines, Switching Station and Access Road for the Authorised De Aar 2 South Wind Energy Facility, De Aar, Northern Cape.*

Over 100 heritage resources were identified within the proposed development footprint. These include surface scatters of Stone Age lithics of low, Grade 3C and Grade 3A heritage significance, some scatters also contain ostrich eggshell fragments, bone and pottery, stone packed kraals, packed rock cairns, farm complexes of Grade 3A heritage significance, modern graffiti on boulder of Grade 3C heritage significance, possibly old wolvehoek of Grade 3C heritage significance.

The recommendations provided in the report include the following:



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- One cluster of archaeological sites requires mitigation, in the form of artefact mapping, recording and collection by the project archaeologist prior to the commencement of construction of the transmission lines. This is JG050-JG052 / GEB013-GEB014, a dense early Holocene LSA stone scatter with ostrich eggshell eroding out of the bank of a stream in the Brak River Valley. The active erosive nature of this cluster of sites suggests that they retain contextual archaeological value and it is recommended that the mitigation take the form of the mapping, recording and collection by the archaeologist of exposed artefactual material, prior to the commencement of any activities related to the installation of the transmission lines;
- Other sites on or close to the transmission lines, switching station and access road route require mitigation by avoidance. Although not directly on the proposed cable or road alignments or switching station site, some of these sites are close enough to potentially be impacted or suffer damage as a direct, or indirect result of the installation of this infrastructure. These sites, each with the buffer described below, must be considered no-go areas during construction activities for the transmission lines, switching station and access road and those nearest the activity areas must be clearly marked as out of bounds:
- G067–JG072 / GEB025. A buffer of 50 m must be implemented around the outer limits of this cluster of sites;
- The possible Khoi kraals and shepherds' huts (JG040; JG064-JG066). A 40 m buffer must be implemented around each site;
- The possible "wolwehok" (JG036). A 20 m buffer must be implemented around this structure;
- The rock engraving (JG044). A 20 m buffer must be implemented around this occurrence;
- The two deflated stone tool clusters (JG122 and JG123). A buffer of 30 m must be implemented around each; and
- GEB105. A buffer of 40 m must be implemented around this waypoint;
- If any of these buffers cannot be implemented or maintained, then these sites will require mitigation, in the form of artefact mapping, recording and collection by the project archaeologist prior to the commencement of construction of the transmission lines or access road;
- Prior to the installation of the transmission lines, the project archaeologist must review pylon positions once these have been determined, to ensure that they will not impact on any recorded heritage resources. The micro-siting of pylon positions may be required, which should also be done in consultation with the archaeologist;
- A Chance Finds Procedure is recommended to be implemented.

It is noted that two PIAs have been included in the HIA, and Professor Bamford indicated "that given overlap

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for most of the previous and current transmission line routes, there is no reason why the 2020 report cannot be reused in the new HIA" (page 26 of the HIA). However, these PIAs do not assess the impact of the proposed developments and their associated activities, including the service roads and new access road.

In an Interim Comment issued on the 24/08/2022, SAHRA requested that an application specific field-based PIA be conducted as part of the EA process. The field assessment may focus on previously unsurveyed sections of the proposed development located in areas of very high sensitivity or sensitive formations, using previous field assessments (not older than 5 years) for the remaining section of the proposed route. Since the issuing of the Interim Comment, a response to SAHRAs comment has been submitted to the case.

The letter states that the EAP assumes that the field survey requested in the comment requires the palaeontologist to assess the proposed access road, however, only a small section of the road is located in an area of very high palaeontological sensitivity. Given the paucity of fossil material identified in the landscape, SAHRA is asked to reconsider the need for a field assessment of the access road at this stage as the BAR and EMPr contains recommendations for a site survey prior to the construction phase or once the final design of the access road has been determined, as included in the HIA.

In an Interim Comment issued on the 14/09/2022, SAHRA requested that an application specific PIA be conducted for the proposed development and as the location of the routes are not yet finalised, no field-assessment was currently required. Since the issuing of the comment, a PIA has been submitted for review (04/10/2022).

*Bamford, M. 2022. Palaeontological Impact Assessment for the proposed Mulilo De Aar grid connection and battery storage project, Northern Cape Province.*

The proposed development is underlain by non-fossiliferous Jurassic Dolerite as well as sediments of the Adelaide subgroup, Tierberg Formation and Quaternary sands. Vertebrates and silicified wood may be present in the Adelaide subgroup rocks located in sections of the proposed Route 2 DA2S Line option 2 part 2 and Route 1, as well as sections of the new access road, while trace fossils and fossil wood fragments may be present in the Tierberg Formation sediments located in the proposed DA2S Line option 2 part 1 route and the connections to the Mulilo De Aar PV. A Chance Finds Procedure is recommended.

## Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and

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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;
- Permits in terms of section 35 of the NHRA must be applied for from SAHRA prior to construction for the mitigation of site JG050-JG052 / GEB013-GEB014;
- All buffers zones recommended by the specialist are supported;
- A report of the review of the final pylon locations must be submitted to SAHRA for comment. Should additional field be required, the report must include the results of the walk-down. No construction may commence without comments from SAHRA 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 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/Nggabutho 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

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

**ADMIN:**

Direct URL to case: <https://sahris.sahra.org.za/node/601987>  
(DFFE, Ref: DFFE Reference: 14/12/16/3/3/1/2595)

**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.