

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

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 19147

Date: Wednesday August 24, 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: 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.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests 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 formations, using previous field assessments (not older than 5 years) for the remaining section of the proposed route. The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments.

The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA Regulations in order to comply with this comment. Further comments will be issued upon receipt of the above requested report.

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

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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: TBC)