

**Palaeontological Impact Assessment for the proposed
development of 14 private homes on Farms
Kaba 324 and Ais 257 near Alexandria,
Eastern Cape Province.**

Desktop Study

For

Nuleaf Planning and Environment

05 September 2018

Prof Marion Bamford

Palaeobotanist

P Bag 652, WITS 2050

Johannesburg, South Africa

Marion.bamford@wits.ac.za


Expertise of Specialist

The Palaeontologist Consultant is: Prof Marion Bamford
Qualifications: PhD (Wits Univ, 1990); FRSSAf, ASSAf
Experience: 30 years research; 22 years PIA studies

Declaration of Independence

This report has been compiled by Professor Marion Bamford, of the University of the Witwatersrand, sub-contracted by Nuleaf Planning and Environment, South Africa. The views expressed in this report are entirely those of the author and no other interest was displayed during the decision making process for the Project.

Specialist: Prof Marion Bamford

Signature: 

Executive Summary

A palaeontological Impact Assessment was requested for the proposed development of 14 private homes on Farms Kaba 324 and Ais 257 near Alexandria, Eastern Cape Province. The affected property, Portion 11, 12, 13, 14, 15 of Farm Kaba 324 & Portion 2, 3, 4, 5, 6, 7, 8, 9, 10 of Farm Ais 257, is situated within the Sunday's River Valley Local Municipality, approximately 115 km north east of Port Elizabeth. This will entail the construction of 14 private homes and all associated civil infrastructure (water, electricity and waste treatment) will be included.

The proposed site lies on the palaeo dune field sands of the Nanaga Formation, Algoa Group, that is Plio-Pleistocene in age. Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the loose sands of the Quaternary. There is a very small chance that recent fossils may occur in the stabilised dunes so a Chance Find Protocol should be added to the EMPr: if fossils are found once excavations for buildings, water, sewage and access roads has commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample.

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1. Background

A Palaeontological Impact Assessment was requested for the proposed development of 14 private homes on Farms Kaba 324 and Ais 257 near Alexandria, Eastern Cape Province. The affected property, Portion 11, 12, 13, 14, 15 of Farm Kaba 324 & Portion 2, 3, 4, 5, 6, 7, 8, 9, 10 of Farm Ais 257, is situated within the Sunday's River Valley Local Municipality, approximately 115 km north east of Port Elizabeth. This will entail the construction of 14 private homes and all associated civil infrastructure (water, electricity and waste treatment). To comply with the South African Heritage Resources Agency (SAHRA) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), a desktop Palaeontological Impact Assessment (PIA) was completed for the proposed development.

The development will be very eco-friendly and use a unique system of foundations called Surefoot. No cement is used but underground steel poles splayed outwards like roots of a tree are used instead to support the above-ground structures, therefore excavation into the dunes will be minimal.

Table 1: Specialist report requirements in terms of Appendix 6 of the EIA Regulations (2014)

A specialist report prepared in terms of the Environmental Impact Regulations of 2014 must contain:	Relevant section in report
Details of the specialist who prepared the report	Appendix B
The expertise of that person to compile a specialist report including a curriculum vitae	Appendix B
A declaration that the person is independent in a form as may be specified by the competent authority	Page 1
An indication of the scope of, and the purpose for which, the report was prepared	Section 1
The date and season of the site investigation and the relevance of the season to the outcome of the assessment	N/A
A description of the methodology adopted in preparing the report or carrying out the specialised process	Section 2
The specific identified sensitivity of the site related to the activity and its associated structures and infrastructure	Section 4 Figure 2, 3
An identification of any areas to be avoided, including buffers	N/A
A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	N/A
A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 5
A description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment	Section 4

Any mitigation measures for inclusion in the EMPr	n/a
Any conditions for inclusion in the environmental authorisation	n/a
Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 8
A reasoned opinion as to whether the proposed activity or portions thereof should be authorised	N/A
If the opinion is that the proposed activity or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	N/A
A description of any consultation process that was undertaken during the course of carrying out the study	N/A
A summary and copies if any comments that were received during any consultation process	N/A
Any other information requested by the competent authority.	N/A

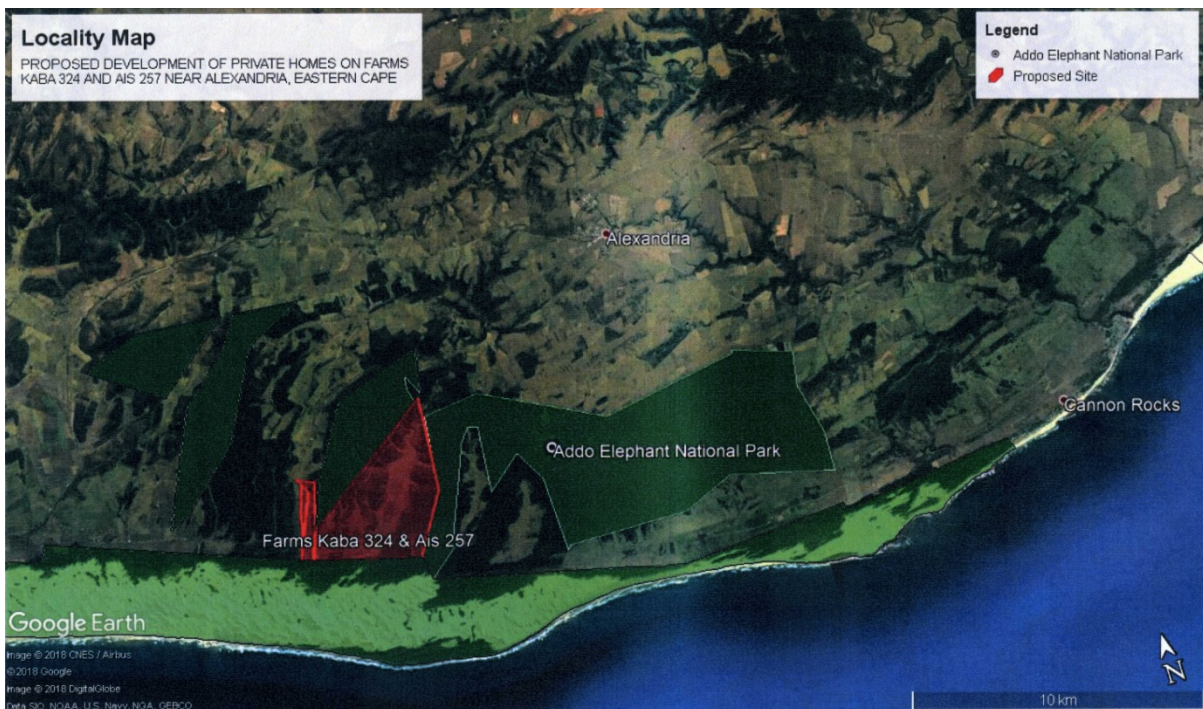


Figure 1: Google Earth map of the proposed site for the development of 14 private homes on the slopes facing the sea (red area). Map supplied by Nuleaf.

2. Methods and Terms of Reference

The Terms of Reference (ToR) for this study were to undertake a PIA and provide feasible management measures to comply with the requirements of SAHRA.

The methods employed to address the ToR included:

1. Consultation of geological maps, literature, palaeontological databases, published and unpublished records to determine the likelihood of fossils occurring in the affected areas. Sources included records housed at the Evolutionary Studies Institute at the University of the Witwatersrand and SAHRA databases;
2. Where necessary, site visits by a qualified palaeontologist to locate any fossils and assess their importance (*not applicable to this assessment*);
3. Where appropriate, collection of unique or rare fossils with the necessary permits for storage and curation at an appropriate facility (*not applicable to this assessment*); and
4. Determination of fossils' representivity or scientific importance to decide if the fossils can be destroyed or a representative sample collected (*not applicable to this assessment*).

3. Geology and Palaeontology

i. Project location and geological context

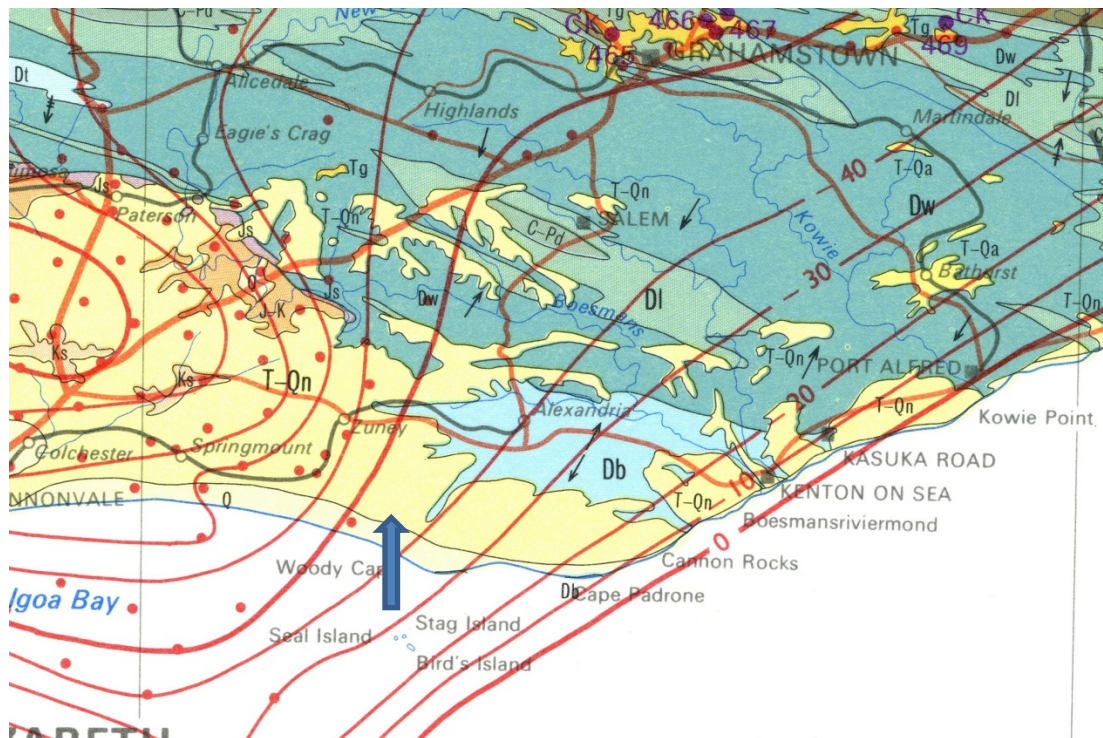


Figure 2: Geological map of the area along the Eastern Cape Coast and Alexandria. The location of the proposed project is indicated with the arrow. Abbreviations of the rock types are explained in Table 2. Map enlarged from the Geological Survey 1: 1 000 000 map 1984.

Table 2: Explanation of symbols for the geological map and approximate ages (Roberts et al., 2006; Thamm and Johnson, 2006. SG = Supergroup; Fm = Formation.

Symbol	Group/Formation	Lithology	Approximate Age
Q	Quaternary	Alluvium, sand, calcrete	Neogene, ca 25 Ma to present
T-Qn	Nanaga Fm, Algoa Group	Palaeo dune fields, calcareous sandstone, calcretes	Pliocene to Early Pleistocene
Dl	Kommadaga/Lake Mentz subgroup, Cape Supergroup	Shale, sandstone, diamictite	Late Devonian
Dw	Witteberg Group, Cape Supergroup	Quartzitic sandstone, shale	Middle to late Devonian
Db	Bokkeveld Group, Cape Supergroup	Shale	Early to middle Devonian

The Cape Supergroup extends for about 1000km along the southern coast of South Africa and represents about 170 million years of deposition, from 500-330Ma, in a passive margin basin that subsequently has been deformed by the Cape orogeny (Thamm and Johnson, 2006). It comprises three distinctive subdivisions, the Table Mountain Group, the Bokkeveld and Witteberg Groups. The sandstones and shales of the Bokkeveld group were formed by repeated basinward progradation or wave-dominated deltas. The overlying Witteberg Group sandstones and mudrock represent deposition in shallow marine, paralic and deltaic and deltaic environments (ditto).

Occurring in the hinterland of Algoa Bay and along the coast west of Port Elisabeth, the Nanaga Formation is made up of coastal palaeo-dune fields. The sands are medium-grained cross-bedded calcareous sandstone and calcretes (Roberts et al., 2006).

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 3. The site for development is in the Nanaga Formation, Algoa Group. The palaeodunes were formed during the Pliocene and have become stabilised by vegetation along this stretch of coastline. While active, dunes will not preserve fossils, since the sand moves continuously. Once stabilised, the surface becomes bioturbated by plant roots and invertebrates burrowing into the sand so any sedimentary structures become blurred and palaeosurfaces would not be recognised. If the sands contain shell fragments from their marine history these can promote the calcareous cementation and stabilisation of the dunes. It is unlikely that any of these marine shells are large enough to be recognised but there is a small possibility that this could be the case. Apart from a general synthesis of invertebrate and marine fossils from the Algoa Group by Le Roux (1990) and mentioned in Roberts et al., (2006) there has been no recent published work on this formation.



Figure 3: SAHRIS palaeosensitivity maps for the site for the proposed housing development shown within the yellow rectangles. Colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

From the SAHRIS map above the area is indicated as highly sensitive (red). The sediments in question are the dunes of the Plio-Pleistocene Nanaga Formation that could potentially have marine or estuarine fossils but there are no available published records of fossils.

4. Impact assessment

An assessment of the potential impacts to possible palaeontological resources considers the criteria encapsulated in Table 3:

TABLE 3A: CRITERIA FOR ASSESSING IMPACTS

PART A: DEFINITION AND CRITERIA		
Criteria for ranking of the SEVERITY/NATURE of environmental impacts	H	Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action.
	M	Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints.
	L	Minor deterioration (nuisance or minor deterioration). Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.
	L+	Minor improvement. Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.

	M+	Moderate improvement. Will be within or better than the recommended level. No observed reaction.
	H+	Substantial improvement. Will be within or better than the recommended level. Favourable publicity.
Criteria for ranking the DURATION of impacts	L	Quickly reversible. Less than the project life. Short term
	M	Reversible over time. Life of the project. Medium term
	H	Permanent. Beyond closure. Long term.
Criteria for ranking the SPATIAL SCALE of impacts	L	Localised - Within the site boundary.
	M	Fairly widespread – Beyond the site boundary. Local
	H	Widespread – Far beyond site boundary. Regional/ national
PROBABILITY (of exposure to impacts)	H	Definite/ Continuous
	M	Possible/ frequent
	L	Unlikely/ seldom

TABLE 3B: IMPACT ASSESSMENT

PART B: ASSESSMENT		
SEVERITY/NATURE	H	-
	M	-
	L	Loose sands do not preserve animal or plant fossils; so far there are no records from the Nanaga Formation The impact would be very unlikely.
	L+	-
	M+	-
	H+	-
DURATION	L	-
	M	-
	H	Where manifest, the impact will be permanent.
SPATIAL SCALE	L	Since only the possible fossils within the area would be fossil shells and invertebrate trace fossils such as burrows, the spatial scale will be localised within the site boundary.
	M	-
	H	-
PROBABILITY	H	-
	M	-
	L	It is extremely unlikely that any fossils would be found in the loose sand that will be minimally excavated for the Surefoot foundations. Nonetheless a chance find protocol should be added to the eventual EMPr.

Based on the nature of the project, surface activities may impact upon the fossil heritage if preserved in the development footprint. The geological structures suggest that the site is predominantly stabilised palaeodunes comprising sands and calcareous sands and these sediments rarely preserve fossils. Since there is an extremely small chance that fossil shells and burrows may be disturbed a Chance Find protocol has been added to this report. Taking account of the defined criteria, the potential impact to fossil heritage resources is extremely low.

5. Assumptions and uncertainties

Based on the geology of the area and the palaeontological record as we know it, it can be assumed that the formation and layout of the sands and calcareous sands are typical for the country and could contain invertebrate fossils (shells, fish fragments) and trace fossils such as burrows. Because of the nature of dunes, windblown sands that are mobile and may eventually be stabilised by vegetation and binding roots and inhabited by small invertebrates, it is unlikely that any fossil in primary context could be preserved. Nonetheless the SAHRS map indicates that the area is highly sensitive so a Chance Find protocol should be followed.

6. Recommendation

Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the loose sands of the Quaternary. There is a very small chance that recent fossils may occur in the stabilised dunes so a Chance Find Protocol should be added to the EMPr: if fossils are found once excavations for buildings, water, sewage and access roads has commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample.

7. References

Anderson, J.M., Anderson, H.M., 1985. Palaeoflora of Southern Africa: Prodrum of South African megafloras, Devonian to Lower Cretaceous. A.A. Balkema, Rotterdam. 423 pp.

Johnson, M.R., van Vuuren, C.J., Visser, J.N.J., Cole, D.I., Wickens, H.deV., Christie, A.D.M., Roberts, D.L., Brandl, G., 2006. Sedimentary rocks of the Karoo Supergroup. In: Johnson, M.R., Anhaeusser, C.R. and Thomas, R.J., (Eds). The Geology of South Africa. Geological Society of South Africa, Johannesburg / Council for Geoscience, Pretoria. Pp 461 – 499.

Le Roux, F.G., 1990. Palaeontological correlation of Cenozoic marine fossil deposits of the southeastern, southern and western coast, Cape Province. South African Journal of Geology 93(3), 514-518.

Plumstead, E.P., 1969. Three thousand million years of plant life in Africa. Geological Society of southern Africa, Annexure to Volume LXXII. 72pp + 25 plates.

Roberts, D.L., Botha, G.A., Maud, R.R., Pether, J., 2006. Coastal Cenozoic deposits. In: Johnson, M.R., Anhaeusser, C.R. and Thomas, R.J., (Eds). The Geology of South Africa. Geological Society of South Africa, Johannesburg / Council for Geoscience, Pretoria. Pp 605-628.

Thamm, A.G., Johnson, M.R., 2006. The Cape Supergroup. In: Johnson, M.R., Anhaeusser, C.R. and Thomas, R.J., (Eds). The Geology of South Africa. Geological Society of South Africa, Johannesburg / Council for Geoscience, Pretoria. Pp 443 – 460.

8. Chance Find Protocol

Monitoring Programme for Palaeontology – to commence once the excavations begin.

1. The following procedure is only required if fossils are seen on the surface and when excavations commence.
2. When excavations begin the rocks and must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (shells, fish remains, trace fossils) should be put aside in a suitably protected place. This way the mining activities will not be interrupted.
3. Photographs of similar fossil plants must be provided to the developer to assist in recognizing the fossil plants in the shales and mudstones. This information will be built into the EMP's training and awareness plan and procedures.
4. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
5. If there is any possible fossil material found by the developer/environmental officer/miners then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.
6. Fossil shells or invertebrate traces that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.
7. If no good fossil material is recovered then the site inspections by the palaeontologist will not be necessary. Annual reports by the palaeontologist must be sent to SAHRA.
8. If no fossils are found and the excavations have finished then no further monitoring is required.

Curriculum vitae (short) - Marion Bamford PhD June 2018

i) Personal details

Surname : **Bamford**
First names : **Marion Kathleen**
Present employment : Professor; Director of the Evolutionary Studies Institute.
Member Management Committee of the NRF/DST Centre of Excellence Palaeosciences, University of the Witwatersrand, Johannesburg, South Africa-
Telephone : +27 11 717 6690
Fax : +27 11 717 6694
Cell : 082 555 6937
E-mail : marion.bamford@wits.ac.za ; marionbamford12@gmail.com

ii) Academic qualifications

Tertiary Education: All at the University of the Witwatersrand:
1980-1982: BSc, majors in Botany and Microbiology. Graduated April 1983.
1983: BSc Honours, Botany and Palaeobotany. Graduated April 1984.
1984-1986: MSc in Palaeobotany. Graduated with Distinction, November 1986.
1986-1989: PhD in Palaeobotany. Graduated in June 1990.

iii) Professional qualifications

Wood Anatomy Training (overseas as nothing was available in South Africa):
1994 - Service d'Anatomie des Bois, Musée Royal de l'Afrique Centrale, Tervuren, Belgium, by Roger Dechamps
1997 - Université Pierre et Marie Curie, Paris, France, by Dr Jean-Claude Koeniguer
1997 - Université Claude Bernard, Lyon, France by Prof Georges Barale, Dr Jean-Pierre Gros, and Dr Marc Philippe

iv) Membership of professional bodies/associations

Palaeontological Society of Southern Africa
Royal Society of Southern Africa - Fellow: 2006 onwards
Academy of Sciences of South Africa - Member: Oct 2014 onwards
International Association of Wood Anatomists - First enrolled: January 1991
International Organization of Palaeobotany – 1993+

Botanical Society of South Africa
 South African Committee on Stratigraphy – Biostratigraphy - 1997 - 2016
 SASQUA (South African Society for Quaternary Research) – 1997+
 PAGES - 2008 –onwards: South African representative
 ROCEEH / WAVE – 2008+
 INQUA – PALCOMM – 2011+onwards

vii) Supervision of Higher Degrees

All at Wits University

Degree	Graduated/completed	Current
Honours	6	1
Masters	8	1
PhD	10	2
Postdoctoral fellows	9	3

viii) Undergraduate teaching

Geology II – Palaeobotany GEOL2008 – average 65 students per year
 Biology III – Palaeobotany APES3029 – average 25 students per year
 Honours – Evolution of Terrestrial Ecosystems; African Plio-Pleistocene Palaeoecology;
 Micropalaeontology – average 2-8 students per year.

ix) Editing and reviewing

Editor: Palaeontologia africana: 2003 to 2013; 2014 – Assistant editor
 Guest Editor: Quaternary International: 2005 volume
 Member of Board of Review: Review of Palaeobotany and Palynology: 2010 –
 Cretaceous Research: 2014 -

Review of manuscripts for ISI-listed journals: 25 local and international journals

x) Palaeontological Impact Assessments

Selected – list not complete:

- Thukela Biosphere Conservancy 1996; 2002 for DWAF
- Vioolsdrift 2007 for Xibula Exploration
- Rietfontein 2009 for Zitholele Consulting
- Bloeddrift-Baken 2010 for TransHex
- New Kleinfontein Gold Mine 2012 for Prime Resources (Pty) Ltd.
- Thabazimbi Iron Cave 2012 for Professional Grave Solutions (Pty) Ltd
- Delmas 2013 for Jones and Wagener
- Klipfontein 2013 for Jones and Wagener
- Platinum mine 2013 for Lonmin
- Syferfontein 2014 for Digby Wells
- Canyon Springs 2014 for Prime Resources
- Kimberley Eskom 2014 for Landscape Dynamics

- Yzermyne 2014 for Digby Wells
- Matimba 2015 for Royal HaskoningDV
- Commissiekraal 2015 for SLR
- Harmony PV 2015 for Savannah Environmental
- Glencore-Tweefontein 2015 for Digby Wells
- Umkomazi 2015 for JLB Consulting
- Ixia coal 2016 for Digby Wells
- Lambda Eskom for Digby Wells
- Alexander Scoping for SLR
- Perseus-Kronos-Aries Eskom 2016 for NGT
- Mala Mala 2017 for Henwood
- Modimolle 2017 for Green Vision
- Klipoortjie and Finaalspan 2017 for Delta BEC
- Ledjadja borrow pits 2018 for Digby Wells
- Lungile poultry farm 2018 for CTS
- Olienhout Dam 2018 for JP Celliers
- Isondlo and Kwasobabili 2018 for GCS
- Kanakies Gypsum 2018 for Cabanga
- Nababeep Copper mine 2018
- Glencore-Mbali pipeline 2018 for Digby Wells
-

xi) Research Output

Publications by M K Bamford up to June 2018 peer-reviewed journals or scholarly books: over 120 articles published; 5 submitted/in press; 8 book chapters.

Scopus h index = 26; Google scholar h index = 28;

Conferences: numerous presentations at local and international conferences.

xii) NRF Rating

NRF Rating: B-2 (2016-2020)

NRF Rating: B-3 (2010-2015)

NRF Rating: B-3 (2005-2009)

NRF Rating: C-2 (1999-2004)