

**McGregor Museum  
Department of Archaeology**



**POFADDER SOLAR THERMAL  
PLANT**

**Archaeology**

**Specialist Input for the Environmental  
Impact Assessment Phase and  
Environmental Management Plan for the  
proposed Pofadder Solar Thermal Plant,  
Northern Cape Province**

David Morris  
November 2010

## **POFADDER SOLAR THERMAL PLANT**

### **SPECIALIST INPUT FOR THE ENVIRONMENTAL IMPACT ASSESSMENT PHASE AND ENVIRONMENTAL MANAGEMENT PLAN FOR THE PROPOSED POFADDER SOLAR THERMAL PLANT, NORTHERN CAPE PROVINCE**

#### **ARCHAEOLOGY**

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#### **1. INTRODUCTION**

A scoping phase evaluation of the full site on the Farm Scuit-Klip 92, portion 4, which is located east of Pofadder in the Northern Cape, narrowed the choice of site for the proposed development to a development footprint of approximately 11 km<sup>2</sup> in the southern portion of the site within the broader site of 33 km<sup>2</sup>. The development footprint is the area which will be disturbed during the operational phase.

##### **1.1 Focus and Content of Specialist Report: Archaeology**

The archaeology specialist study (commissioned by Savannah Environmental (Pty) Ltd), is focused on the development footprint of the proposed facility and its ancillary infrastructure including steam turbine and generator, generator transformer and substation, overhead power line, water supply line to the facility and an abstraction point on the Gariep / Orange River, water storage / treatment reservoirs, an evaporation pond, workshops, storage areas and access roads.

This specialist study is a stand-alone report (as per the EIA Regulations) and incorporates the following information:

- » Introduction to the Specialist in terms of qualifications, accreditation and experience to undertake the study (1.2, below)
- » Description of the affected environment (2)
- » Description of heritage features of the region (2.1)
- » Description of issues identified during the Scoping process (2.2)
- » Methodology of determining the significance of the impacts and assumptions as well as scoping phase predictions (3)
- » Observations and Assessment of impacts, including a summary in tabular format (4)
- » Comparative assessment of alternatives (4.3.2)

- » Recommended measures for draft Environmental Management Plan and site-specific mitigation (5)
- » Conclusions (6)

## **1.2 Archaeology Specialist**

The author of this report is a qualified archaeologist (MA cum laude, PhD candidate, University of the Western Cape) accredited as a Principal Investigator by the Association of Southern African Professional Archaeologists. The author has worked as a museum archaeologist in the Northern Cape since 1985 and has since the late 1980s carried out surveys in the general area of Pofadder (Morris 2002, 2005, 2006; Morris & Beaumont 1991; Morris & Seliane 2006).

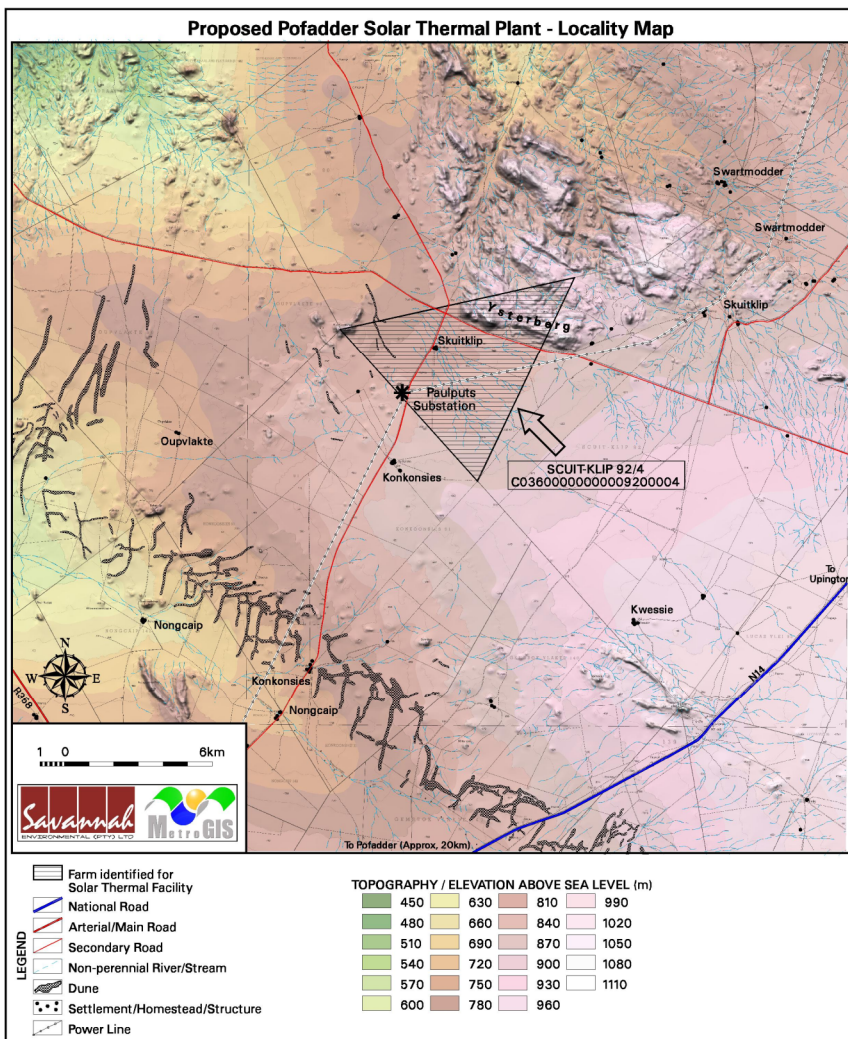
The author is independent of the organisation commissioning this specialist input, and provides this Specialist Report within the framework of the National Heritage Resources Act (No 25 of 1999).

The National Heritage Resources Act No. 25 of 1999 (NHRA) protects heritage resources which include archaeological and palaeontological objects/sites older than 100 years, graves older than 60 years, structures older than 60 years, as well as intangible values attached to places. The Act requires that anyone intending to disturb, destroy or damage such sites, objects and/or structures may not do so without a permit from the relevant heritage resources authority. This means that a Heritage Impact Assessment should be performed, resulting in a specialist report as required by the relevant heritage resources authority/ies to assess whether authorisation may be granted for the disturbance or alteration, or destruction of heritage resources.

## **2. DESCRIPTION OF THE AFFECTED ENVIRONMENT**

The environment in question is arid, comprising relatively flat drainage plains with mountainous features at the north western and north eastern regions of the identified site. The landscape is sparsely vegetated, therefore making any surface archaeological traces highly visible.

There are several outcropping rocky features in the north west and north east of the plain.



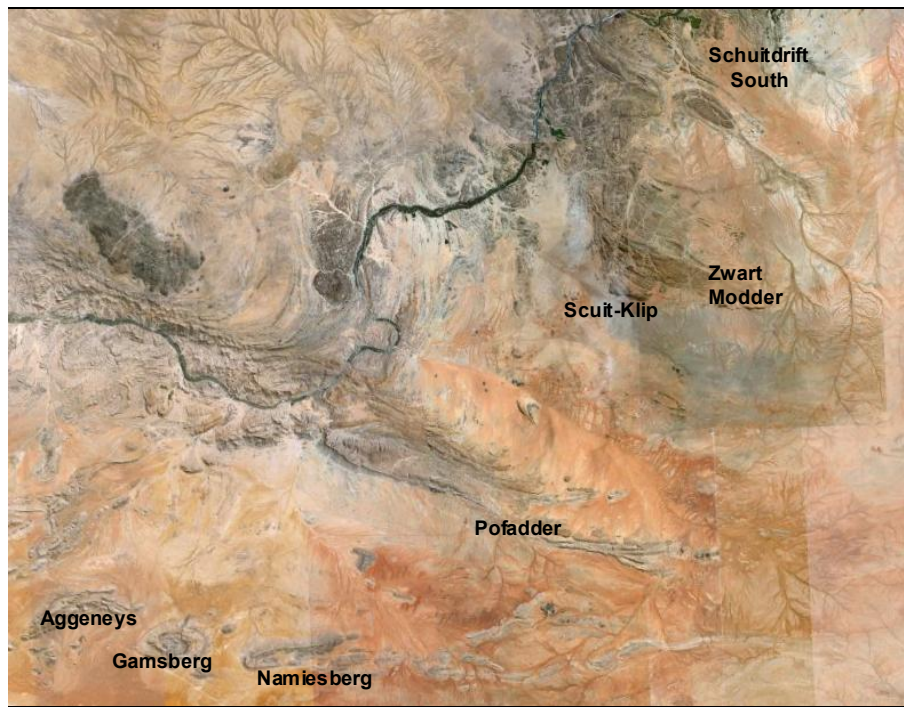
**Figure 1:** The location of the site identified for the proposed Pofadder Solar Thermal Plant, located east of Pofadder and south-east of the Gariep (Orange) River in the Northern Cape.

## **2.1 Description of heritage features of the region**

### **Heritage features of the region**

#### Colonial frontier

The eighteenth- and nineteenth-century records for this region (Penn 2005) include the travelogues of George Thompson (1827) and E.J. Dunn (1931, Robinson 1978), who visited the area in 1824 and 1872 respectively. Place names were becoming fixed in this colonial frontier period (in a cadastral sense, on maps and in farm names), many such names having Khoe-San origins encapsulating vestiges of precolonial/indigenous social geography. A much more prominent appreciation now emerging concerning the history of genocide against the Bushmen in this area (Anthing 1863), with certain mountainous areas (like Gamsberg near Aggeneys) being likely massacre sites, referred to by Dunn in 1872 (Robinson 1978) and, more obliquely, by Anthing (1863; Jose Manuel de Prada-Samper pers. comm. 2009). Dunn refers to conflict at Zwart Modder, the farm adjoining Scuit-Klip, where he recorded an isolated grave of a member of the Northern Border Police, which has yet to be relocated. Immediately below the Ysterberg ridge, located on the Farm Scuit-Klip, there is a road-side twentieth century grave (Morris 1999a).



Regional focus: the study area relative to Aggeneys and some other places mentioned.

#### Later Stone Age

Late Holocene Later Stone Age (LSA) sites are the predominant archaeological trace noted in surveys in the Aggeneys-Pofadder region (Morris 1999a-b, 2000a-c, 2001, 2010). Beaumont *et al.* (1995) have shown, with reference to the LSA, that "virtually all the Bushmanland sites so far located appear to be ephemeral occupations by small groups in the hinterland on both sides of the [Orange] river" (1995:263). This was in sharp contrast to the substantial herder encampments along the Orange River floodplain itself (Morris & Beaumont 1990), which reflected the "much higher productivity and carrying capacity of these bottom lands." "Given choice, the optimal exploitation zone for foragers would have been the Orange River." The appearance of herders in the Orange River Basin, Beaumont *et al.* argue, led to competition over resources and ultimately to marginalisation of hunter-gatherers, some of whom then occupied Bushmanland, probably mainly in the last millennium, and focused their

hunting and gathering activities around the limited number of water sources in the region. Surveys have located signs of human occupation mainly in the shelter of granite inselbergs, on red dunes which provided clean sand for sleeping, or around the seasonal pans (Beaumont *et al.* 1995:264). Possibly following good rains, herders moved into the Orange River hinterland, as attested archaeologically at sites with ample pottery near Aggeneys and, east of Pofadder, at Schuitdrift South – Morris 1999a). However, Thompson (1824) refers to herder groups settled at the stronger springs such as Pella dispersing during periods of drought to smaller springs in the region, which could equally well account for the traces referred to here. Dunn, in 1872, refers to a place at Schuit Klip (i.e. Scuit-Klip) where water collected following rains and was still available after a year of no rain in the vicinity (Robinson 1978:60-61). At such times competition between groups over resources and stress within an already marginalised hunter-gatherer society, must have intensified.

#### Pleistocene: Middle and Earlier Stone Age

Beaumont *et al.* (1995:240-1) note a widespread low density stone artefact scatter of Pleistocene age across areas of Bushmanland to the south where raw materials, mainly quartzite cobbles, were derived from the Dwyka till. Systematic collections of this material made at Olyvenkolk, south west of Kenhardt and Maans Pannen, and east of Gamoep, could be separated out by abrasion state into a fresh component of Middle Stone Age (MSA) with prepared cores, blades and points, and a large aggregate of moderately to heavily weathered Earlier Stone Age (ESA).

Beaumont *et al.* have shown that "substantial MSA sites are uncommon in Bushmanland" (1995:241): and those that have been documented thus far have generally yielded only small samples (Morris & Beaumont 1991; Smith 1995).

The ESA included Victoria West cores on dolerite, long blades, and a very low incidence of handaxes and deavers. The Middle (and perhaps in some instances Lower) Pleistocene occupation of the region that these artefacts reflect must have occurred at times when the environment was more hospitable than today. This is suggested by the known greater reliance of people in Acheulean times on quite restricted ecological ranges, with proximity to water being a recurrent factor in the distribution of sites.

No substantial sites have been found previously in the survey area. Only very sparse localized scatters of stone tools have been seen in places, with limited traces in the hills or at the bases of hills. There is a roadside grave along one of the roads in the vicinity; however the area has not been investigated in its entirety.

## **2.2 Description and evaluation of environmental issues and potential impacts identified in the scoping phase**

Heritage resources including archaeological sites are in each instance unique and non-renewable resources. Area and linear developments such as those envisaged can have a permanent destructive impact on these resources. The objective of an EIA would be to assess the sensitivity of such resources where present, to evaluate the significance of potential impacts on these resources and, if and where appropriate, to recommend no-go areas and measures to mitigate or manage said impacts.

Area impacts are possible in the case of the Pofadder Solar Thermal Plant itself; power line, water supply lines and access roads would represent linear impacts.

### ***2.2.1 Direct, indirect, and cumulative impacts (in terms of nature, magnitude, and extent)***

The destructive impacts that are possible in terms of heritage resources would tend to be direct, once-off events occurring during the initial construction period. In the long-term, the proximity of operations in a given area could result in secondary indirect impacts resulting from the movement of people or vehicles in the immediate or surrounding vicinity. The Environmental Management Plan should seek to minimise the latter impacts as far as possible.

With respect to the magnitude and extent of potential impacts, it has been noted that the erection of power lines would have a relatively small impact on Stone Age sites, in light of Sampson's (1985) observations during surveys beneath power lines in the Karoo (actual modification of the landscape tends to be limited to the footprint of each pylon), whereas a road or a water supply pipeline would tend to be far more destructive (modification of the landscape surface would be within a continuous strip), albeit relatively limited in spatial extent, i.e. width (Sampson compares such destruction to the pulling out of a thread from an ancient tapestry). The water pipeline could traverse more sensitive terrain, i.e. affecting a potentially greater density of archaeological sites.

## **3. METHODOLOGY**

This report is a desk top study; a site visit was not undertaken prior to the release of the Draft EIA Report due to time related constraints on part of the specialist. However, a site visit will be conducted in order to confirm the content of this report.



This is deemed sufficient as the specialist has undertaken previous detailed work within the broader study area.

A walk through study will include an inspection of various parts of the terrain on foot, focusing on areas of expected impact (construction of solar plant, power island, and secondary infrastructure such as roads, pipelines, and power lines). Heritage traces would be evaluated in terms of their archaeological significance (see tables below).

### **3.1 Assumptions and limitations**

It was assumed that, largely in this landscape, with its sparse vegetation and shallow soil profiles, some sense of the archaeological traces to be found in the area would be readily apparent from surface observations (including assessment of places of erosion or past excavations that expose erstwhile below-surface features). It was not considered necessary to conduct excavations as part of the EIA to establish the potential of sub-surface archaeology.

A proviso is routinely given, that should sites or features of significance be encountered during construction (this could include an unmarked burial, an ostrich eggshell water flask cache, or a high density of stone tools, for instance), specified steps are necessary (i.e. cease work, report to heritage authority).

With regard to fossils, a preliminary assessment of the likelihood fossils occurring in this area has been provided by a palaeontologist.

### **3.2 Potentially significant impacts to be assessed in the EIA process**

Any area or linear, primary, and secondary, disturbance of surfaces in the development locales could have a destructive impact on heritage resources, where present. In the event that such resources are found, they are likely to be of a nature that potential impacts could be mitigated by documentation and/or salvage following approval and permitting by the South African Heritage Resources Agency and, in the case of any built environment features, by Ngwao Bošwa ya Kapa Bokone (the Northern Cape Heritage Authority). Although unlikely, there may be some that could require preservation *in situ* and hence modification of intended placement of development features.

Disturbance of surfaces includes any construction: of a road, a pipeline, erection of a pylon, or preparation of a site for a substation, or plant, or building, or any other *clearance* of, or *excavation* into, a land surface. In the event of archaeological materials being present such activity would alter or destroy their context (even if the

artefacts themselves are not destroyed, which is also obviously possible). Without context, archaeological traces are of much reduced significance. It is the contexts as much as the individual items that are protected by the heritage legislation.

Some of the activities indicated here have a generally lower impact than others. For example, Sampson (1985) has shown that powerlines tend to be less destructive on Stone Age sites than roads since access along the route of the line during construction and maintenance tends to be by way of a 'twee-spoor' temporary roadway (not scraped, the surface not significantly modified). Individual tower positions might be of high archaeological significance (e.g. a grave, or an engraving). The impact of a 'twee-spoor' could be far greater on Iron Age sites in other parts of South Africa, where stone walling might need to be breached.

### **3.3 Determining archaeological significance**

In addition to guidelines provided by the National Heritage Resources Act (Act No. 25 of 1999), a set of criteria based on Deacon (nd) and Whitelaw (1997) for assessing archaeological significance has been developed for Northern Cape settings (Morris 2000a). These criteria include estimation of landform potential (in terms of its capacity to contain archaeological traces) and assessing the value to any archaeological traces (in terms of their attributes or their capacity to be construed as evidence, given that evidence is not given but constructed by the investigator).

#### *Estimating site potential*

Table 1 (below) is a classification of landforms and visible archaeological traces used for estimating the potential of archaeological sites (after J. Deacon nd, National Monuments Council). Type 3 sites tend to be those with higher archaeological potential, but there are notable exceptions to this rule, for example the renowned rock engravings site Driekopseiland near Kimberley which is on landform L1 Type 1 – normally a setting of lowest expected potential. It should also be noted that, generally, the older a site the poorer the preservation, so that sometimes *any* trace, even of only Type 1 quality, can be of exceptional significance. In light of this, estimation of potential will always be a matter for archaeological observation and interpretation.

#### *Assessing site value by attribute*

Table 2 (below) is adapted from Whitelaw (1997), who developed an approach for selecting sites meriting heritage recognition status in KwaZulu-Natal. It is a means of judging a site's archaeological value by ranking the relative strengths of a range of

attributes (given in the second column of the table). While aspects of this matrix remain qualitative, attribute assessment is a good indicator of the general archaeological significance of a site, with Type 3 attributes being those of highest significance.

Table 1. Classification of landforms and visible archaeological traces for estimating the potential for archaeological sites (after J. Deacon, National Monuments Council).

<b>Class</b>	<b>Landform</b>	<b>Type 1</b>	<b>Type 2</b>	<b>Type 3</b>
L1	Rocky surface	Bedrock exposed	Some soil patches	Sandy/grassy patches
L2	Ploughed land	Far from water	In floodplain	On old river terrace
L3	Sandy ground, inland	Far from water	In floodplain or near feature such as hill	On old river terrace
L4	Sandy ground, Coastal	>1 km from sea	Inland of dune cordon	Near rocky shore
L5	Water-logged deposit	Heavily vegetated	Running water	Sedimentary basin
L6	Developed urban	Heavily built-up with no record of early settlement	Known early settlement, but buildings have basements	Buildings without extensive basements over known historical sites
L7	Lime/dolomite	>5 myrs	<5000 yrs	Between 5000 yrs and 5 myrs
L8	Rock shelter	Rocky floor	Sloping floor or small area	Flat floor, high ceiling
Class	Archaeological traces	Type 1	Type 2	Type 3
A1	Area previously excavated	Little deposit remaining	More than half deposit remaining	High profile site
A2	Shell or bones visible	Dispersed scatter	Deposit <0.5 m thick	Deposit >0.5 m thick; shell and bone dense
A3	Stone artefacts or stone walling or other feature visible	Dispersed scatter	Deposit <0.5 m thick	Deposit >0.5 m thick

Table 2. Site attributes and value assessment (adapted from Whitelaw 1997)

Class	Attribute	Type 1	Type 2	Type 3
1	Length of sequence/context	No sequence Poor context Dispersed distribution	Limited sequence	Long sequence Favourable context High density of arte/ecofacts
2	Presence of exceptional items (incl regional rarity)	Absent	Present	Major element
3	Organic preservation	Absent	Present	Major element
4	Potential for future archaeological investigation	Low	Medium	High
5	Potential for public display	Low	Medium	High
6	Aesthetic appeal	Low	Medium	High
7	Potential for implementation of a long-term management plan	Low	Medium	High

#### 4. POTENTIAL AREAS OF SENSITIVITY

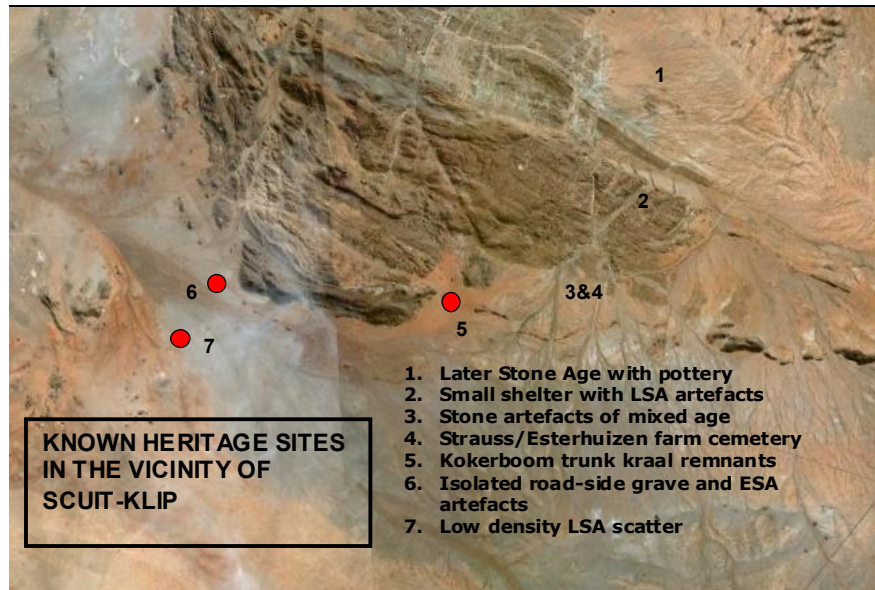
Based on previous experience in the area, it is estimated that the terrain close to hills or rocky features, particularly sandy spots near sheltering rocks, may tend to have traces of precolonial Stone Age occupation/activity. Such a site was previously documented on the adjoining farm Zwart Modder (Morris 1999a).

While places in the open plains have been found to have sparsely scattered artefacts (such as at Konkonsies near the Paulputs Substation site – Morris 1999a), these areas are expected to be less significant. An exception to this is where rocky outcrops at the surface on the plains provide places where water pools exist after rains. Such places often attracted people in the past with traces of this including artificial grinding grooves in the bedrock and ample evidence of stone artefacts and pottery. A very good example of this is at Schuifdrift South. The name Skuit-Klip may refer to such a locale on this property, though not necessarily in that portion selected for the present project. It is in fact described in some detail by Dunn (Robinson 1978:60-61): "Two holes occur in the gneiss at the crest of a ridge ... when heavy thunder rains sweep over this arid country the water runs into and sometimes fills these most useful reservoirs, in which it is stored up and lasts many months."

The sand dunes in the north western part of the area may also have been a focus for past human occupation.

Colonial era sites or features within the study area include the known road-side grave below Ysterberg, a presently unknown grave recorded by Dunn (see above) of a member of the Northern Border Police (near Zwart Modder), and a farm cemetery and homestead/kraal ruins at the old Skuit-Klip farm between the study area and

Zwart Modder. Strauss and Esterhuizen family graves in the cemetery date between 1914 and 1974.



## 5. OBSERVATIONS AND ASSESSMENT OF IMPACTS

The manner in which archaeological and other heritage traces or values might be affected by the proposed development may be summed up in the following terms: it would be any act or activity that would result immediately or in the future in the destruction, damage, excavation, alteration, removal or collection from its original position, any archaeological material or object (as indicated in the National Heritage Resources Act (No 25 of 1999)). The most obvious impact in this case would be land surface disturbance associated with infrastructure construction.

### 5.1 Characterising the significance of impacts

The following criteria are used in this Environmental Impact Assessment to characterise the significance of direct, indirect, and cumulative impacts:

- » The **nature**, which shall include a description of what causes the effect, what will be affected, and how it will be affected.
- » The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional:

- \* local extending only as far as the development site area – assigned a score of 1;
- \* limited to the site and its immediate surroundings (up to 10 km) – assigned a score of 2;
- \* will have an impact on the region – assigned a score of 3;
- \* will have an impact on a national scale – assigned a score of 4; or
- \* will have an impact across international borders – assigned a score of 5.
- » The **duration**, wherein it will be indicated whether:
  - \* the lifetime of the impact will be of a very short duration (0–1 years) – assigned a score of 1;
  - \* the lifetime of the impact will be of a short duration (2-5 years) - assigned a score of 2;
  - \* medium-term (5–15 years) – assigned a score of 3;
  - \* long term (> 15 years) - assigned a score of 4; or
  - \* permanent - assigned a score of 5.
- » The **magnitude**, quantified on a scale from 0-10, where a score is assigned:
  - \* 0 is small and will have no effect on the environment;
  - \* 2 is minor and will not result in an impact on processes;
  - \* 4 is low and will cause a slight impact on processes;
  - \* 6 is moderate and will result in processes continuing but in a modified way;
  - \* 8 is high (processes are altered to the extent that they temporarily cease); and
  - \* 10 is very high and results in complete destruction of patterns and permanent cessation of processes.
- » The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. Probability will be estimated on a scale, and a score assigned:
  - \* Assigned a score of 1–5, where 1 is very improbable (probably will not happen);
  - \* Assigned a score of 2 is improbable (some possibility, but low likelihood);
  - \* Assigned a score of 3 is probable (distinct possibility);
  - \* Assigned a score of 4 is highly probable (most likely); and
  - \* Assigned a score of 5 is definite (impact will occur regardless of any prevention measures).
- » the **significance**, which shall be determined through a synthesis of the characteristics described above (refer formula below) and can be assessed as low, medium or high.
- » the **status**, which will be described as either positive, negative or neutral.
- » the degree to which the impact can be reversed.
- » the degree to which the impact may cause irreplaceable loss of resources.
- » the *degree* to which the impact can be *mitigated*.

The **significance** is determined by combining the criteria in the following formula:

$$S = (E+D+M) P; \text{ where}$$

S = Significance weighting  
 E = Extent  
 D = Duration  
 M = Magnitude  
 P = Probability

The **significance weightings** for each potential impact are as follows:

- » < 30 points: Low (i.e. where this impact would not have a direct influence on the decision to develop in the area),
- » 30-60 points: Medium (i.e. where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- » > 60 points: High (i.e. where the impact must have an influence on the decision process to develop in the area).

**5.1.1 Impact table summarising the significance of impacts (with and without mitigation)**

The following table considers the development footprint of the proposed facility with its ancillary infrastructure.

<b>Nature:</b>		
Acts or activities resulting in disturbance of surfaces and/or sub-surfaces containing artefacts (causes) resulting in the destruction, damage, excavation, alteration, removal or collection from its original position (consequences), of any archaeological material or object (what affected).		
	<b>Without mitigation</b>	<b>With mitigation</b>
<b>Extent</b>	1	1
<b>Duration</b>	5	5
<b>Magnitude</b>	6	4
<b>Probability</b>	4	3
<b>Significance</b>	<b>48</b>	<b>30</b>
<b>Status (positive or negative)</b>	Negative	
<b>Reversibility</b>	No	
<b>Irreplaceable loss of resources</b>	Yes - but the archaeological resources are not of major significance	
<b>Can impacts be mitigated</b>	Yes - but not considered necessary in most instances	See above.
<b>Mitigation:</b> Artefact densities are low over most of the development footprint, so much so that mitigation measures are not considered necessary in most instances. Although the criteria for significance given in this matrix give a Medium significance weighting (unlike		

biological processes, heritage destruction generally has a once-off permanent impact), it has been shown that the archaeological significance of the materials observed may be regarded as low. As indicated above (in this table), it would be worth carrying out a surface collection and record of the site at 28.54109° S 21.08842° E, which falls at the edge of the proposed main development footprint, and this could arguably reduce the 'magnitude' and the 'probability' criteria referred to above.

**Cumulative impacts:** The impacts are once-off permanent destructive events.

### 5.1.2 Comparative assessment of alternatives

The very low density of isolated stone artefacts across the various development areas provides no clear pointers for preferring one or another of the alternative routes for the powerline or the external access road. It is recommended that in each case the preferred shorter routes be selected in that they would result in a lower loss or disturbance of the, albeit, low density artefact occurrences.

## 6. MEASURES FOR INCLUSION IN THE DRAFT ENVIRONMENTAL MANAGEMENT PLAN

**OBJECTIVE:** Archaeological or other heritage materials occurring in the path of any surface or sub-surface disturbances associated with any aspect of the development are highly likely to be subject to destruction, damage, excavation, alteration, or removal. The objective should be to limit such impacts to the primary activities associated with the development and hence to limit secondary impacts during the medium and longer term working life of the facility.

<b>Project component/s</b>	Any road construction over and above what is necessary and any extension of other components addressed in this EIA.
<b>Potential Impact</b>	The potential impact if this objective is not met is that wider areas or extended linear developments may result in further destruction, damage, excavation, alteration, removal or collection of heritage objects from their current context on the site.
<b>Activity/risk source</b>	Activities which could impact on achieving this objective include deviation from the planned lay-out of road/s and infrastructure without taking heritage impacts into consideration.
<b>Mitigation: Target/Objective</b>	A facility environmental management plan that takes cognizance of heritage resources in the event of any future extensions of roads or other infrastructure.  It is not regarded as necessary that any mitigation should take place for the areas identified for development.

Mitigation: Action/control	Responsibility	Timeframe
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Provision for on-going heritage monitoring in a facility environmental management plan which also provides guidelines on what to do in the event of any major heritage feature being encountered during any phase of development or operation.	Environmental management provider with on-going monitoring role set up by the developer.	Environmental management plan to be in place before commencement of development.
No Phase 2 (mitigation) regarded as necessary in terms of present development layout.		

<b>Performance Indicator</b>	Inclusion of further heritage impact consideration in any future extension of infrastructural elements. Immediate reporting to relevant heritage authorities of any heritage feature discovered during any phase of development or operation of the facility.
<b>Monitoring</b>	Officials from relevant heritage authorities (National and Provincial) to be permitted to inspect the operation at any time in relation to the heritage component of the management plan.

## 7. CONCLUSIONS

Very sparse heritage traces are likely to occur in the development footprint areas.

From an archaeological perspective the observed heritage resources either fall well outside of the proposed development footprint or are of low significance. Criteria used here for impact significance assessment rate the impacts as Low (even taking into consideration the fact that for heritage traces, unlike biological processes, impacts tend to be irreversible, of permanent duration and high magnitude).

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