

Strong, Ashlea

From: HWC HWC <HWC.HWC@westerncape.gov.za>
Sent: Friday, 22 October 2021 16:26
To: Jenna Lavin
Cc: Strong, Ashlea
Subject: Re: New Application - Case Reference
Attachments: Notice 17 of 2021 - Update on operations and communication.pdf; HWC BANK DETAILS...DOCX; Notice 6 of 2021 - HWC electronic application submission...pdf; HWC CHECKLIST...DOCX

Good Day Applicant

Thank you for your enquiry, the email below has reference.

Kindly note the case number for your request is : 21102218

Please use the reference number above for payment.

The deposit can be made into the attached bank account. Please find the attached checklist as well for application requirements.

Please email your application to Ceoheritage@westerncape.gov.za

Appeals applications to be sent to the following email
HWC.Appeals@westerncape.gov.za

NB: It is essential that you ensure that the case number is used as the bank reference for any payment made to us. Failure to do so will determine that HWC will regard your application as unpaid.

Kind Regards ,
HWC Admin Team

3rd Floor, Protea Assurance Building
Green Market Square
Cape Town
8001
Tel) [021 483 9695](tel:0214839695)
website: www.hwc.org.za

From: Jenna Lavin <jenna.lavin@ctsheritage.com>
Sent: Friday, October 22, 2021 1:20:26 PM
To: HWC HWC <HWC.HWC@westerncape.gov.za>
Cc: Strong, Ashlea <Ashlea.Strong@wsp.com>
Subject: New Application - Case Reference

Hi there,

Please can I get a Case Number for the following section 38(8) NID submission:

Proposed establishment of 132kV powerline to evacuate power from the Karreebosch WEF to the National Grid in the Western and Northern Cape

Located on Wilgebosch Rivier 188 Remainder, Ekkraal (Nuwekraal) 199 Portion 2, Klipbanksfontein 198 Portion 1 and Remainder, Bon Espirange 73 Portion 1 and Remainder, Rietfontein 197, Ekkraal (Nuwekraal) 199 Portion 1 and Remainder and Standvastigheid 210 Portion 2 (Komsberg Substation)

Many thanks

Jenna

	<p>Jenna Lavin Director CTS Heritage</p> <p>16 Edison Way, Century City Tel: +27 (0)87 073 5739, Cell: +27 (0)83 619 0854 info@ctsheritage.com * www.ctsheritage.com</p>
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If you are not the intended recipient you may not copy or deliver this message to anyone."



**APPLICATION FORM
NOTIFICATION OF INTENT TO DEVELOP (NID)
SECTION 38 (1) AND SECTION 38 (8)**

Heritage Western Cape Reference No:

To be completed by the applicant

Completion of this form is required by Heritage Western Cape for the initiation of all impact assessment processes under Section 38 (1) & (8) of the National Heritage Resources Act (NHRA)

As per Section 38 (1) (e) of the NHRA, submission of the NID must be initiated at the earliest stage of development. Should the development trigger any other legislation, practitioners may submit the NID without formal submission to other statutory bodies in order to comply with the NHRA.

This form is to be read in conjunction with the HWC Notification of Intent to Develop, Heritage Impact Assessment, (Pre-Application) Basic Assessment Reports, Scoping Reports and Environmental Impact Assessments, Guidelines for Submission to HWC

Whilst it is not a requirement, it may expedite processes and in particular avoid calls for additional information if certain of the information required in this form is provided by a heritage specialist/s with the necessary qualifications, skills and experience. All sections of the form must be completed in order to deem the application to be complete.

Making an incorrect statement or providing incorrect information may result in all or part of the application having to be reconsidered by HWC in the future, or submission of a new application.

The following information is to be included upon submission to HWC:

1. Proof of payment with correct reference number
2. Completed and signed application form – the application form must be completed in full in order to be considered
3. Power of Attorney
4. Locality Map
5. Images of the site and its context
6. Additional information pertaining to the heritage of the site

Application and associated documentation to be emailed to ceoheritage@westerncape.gov.za

A. APPLICABILITY OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NEMA)

Department of Environmental Affairs Development Planning (Western Cape); Department of Mineral Resources (National); Department of Environmental Affairs (National);
Reference Number (if applicable):

Please tick the applicable section:



This application is made in terms of Section 38(8) of the NHRA and an application under NEMA has been made to the following authority: DFFE

This development will not require a NEMA application.

B. BASIC DETAILS

PROPERTY DETAILS:

Name of property: Proposed Karreebosch Powerline	
Street address or location (eg: off R44): West of the R354	
Erf or farm number/s: Wilgebosch Rivier 188 Remainder, Nuwekraal 199 Portion 2, Klipbanksfontein 198 Portion 1 and Remainder, Bon Espirange 73 Portion 1 and Remainder, Rietfontein 197, Ek Kraal 199 Portion 1 and Remainder, and Karreebosch 200 Remainder, Aprils Kraal 105, and Komsberg 210 Portion 2 (Komsberg Substation)	Coordinates: S 32°53'48.07"S E 20°30'44.56"E (A logical centre point. Format based on WGS84.)
Town or District: Near Laingsburg	Municipality: Laingsburg
Extent of property: NA	Current use: Vacant wilderness, rural
Predominant land use/s of surrounding properties: Renewable Energy	

REGISTERED OWNER OF PROPERTY: REFER TO THE ATTACHED LANDOWNER CONSENT FORMS

Name and Surname:		
Address		
Telephone	Cell	E-mail
APPLICANT/ AUTHORISED AGENT:		
Name and Surname: Dr Kilian Erich Hagemann		
Address: 125 Buitengracht Street, 5th floor, Cape Town 8001, South Africa		
Telephone 021 300 0610	Cell 021 300 0610	E-mail Karreebosch@g7energies.com

By the submission of this form and all material submitted in support of this notification (ie: 'the material'), all applicant parties acknowledge that they are aware that the material and/or parts thereof will be put to the following uses and consent to such use being made: filing as a public record; presentations to committees, etc; inclusion in databases; inclusion on and downloading from websites; distribution to committee members and other stakeholders and any other use required in terms of powers, functions, duties and responsibilities allocated to Heritage Western Cape under the terms of the National Heritage Resources Act. Should restrictions on such use apply or if it is not possible to copy or lift information from any part of the digital version of the material, the material will be returned unprocessed. All sections of the form have been completed.

Signature of Owner:

Date:

REFER TO THE ATTACHED LANDOWNER CONSENT FORMS

Should the owner not be able to sign, the applicants/ agents must attach copy of power of attorney to this form.

Signature of Applicant/ Authorised Agent:

Date: 22 October 2021

Applicants/ agents must attach copy of power of attorney to this form.

C. DEVELOPMENT DETAILS:

Please indicate below which of the following Sections of the National Heritage Resources Act, or other legislation has triggered the need for notification of intent to develop.

<input checked="" type="checkbox"/>	S38(1)(a) Construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier over 300m in length.	S38(1)(c) Any development or activity that will change the character of a site - <input type="checkbox"/> (i) exceeding 5 000m ² in extent; <input type="checkbox"/> (ii) involving three or more existing erven or subdivisions thereof; <input type="checkbox"/> (iii) involving three or more erven or divisions thereof which have been consolidated within the past five years.
<input type="checkbox"/>	S38(1)(b) Construction of a bridge or similar structure exceeding 50m in length.	
<input type="checkbox"/>	S38(1)(d) Rezoning of a site exceeding 10 000m ² in extent.	
<input checked="" type="checkbox"/>	Other triggers, eg: in terms of other legislation, (ie: National Environment Management Act, etc.) Please set out details: NEMA	If you have checked any of the three boxes above, describe how the proposed development will change the character of the site:

If an impact assessment process has also been / will be initiated in terms of other legislation please provide the following information:

Authority / government department (ie: consenting authority) to which information has been /will be submitted for final decision: DFFE

Present phase at which the process with that authority stands:

Pre-Application Phase

Provide a full description of the nature and extent of the proposed development or activity including its potential impacts:

The development of a 132kV overhead power line to connect the Karreebosch Wind Energy Facility (WEF) Energy Facility to the national grid via the existing Eskom Komsberg substation. The powerline is approximately 20 km long. The project is situated north of the town of Matjiesfontein in the Karoo Hoogland Local Municipality and the Laingsburg Local Municipality in the Northern Cape Province and Western Cape Province. The 132kV grid connection crosses the following properties:

-) Wilgebosch Rivier 188 Remainder
-) Ekkraal (Nuwekraal) 199 Portion 2
-) Klipbanksfontein 198 Portion 1 and Remainder
-) Bon Espirange 73 Portion 1 and Remainder
-) Rietfontein 197
-) Ekkraal (Nuwekraal) 199 Portion 1 and Remainder
-) Standvastigheid 210 Portion 2 (Komsberg Substation)
-) Karreebosch 200 Remainder
-) Aprils Kraal 105

The OHL will be a 132kV steel single or double structure with kingbird conductor (between 15 and 20m in height – above ground level). Standard overhead line construction methodology will be employed – drill holes (typically 2 – 3m in depth), plant poles, string conductor. It is not envisaged that any large excavations and stabilized backfill will be required however this will only be verified on site once the Geotech has been undertaken at each pole position (part of construction works).

Estimated value cost of the project in South African Rands: Between R92 million and R197 million.

D. ANTICIPATED IMPACTS ON HERITAGE RESOURCES

Section 3 of the National Heritage Resources Act sets out the following categories of heritage resource as forming part of the national estate. Please indicate the known presence of any of these by checking the box alongside and then providing a description of each occurrence, including nature, location, size, type

Failure to provide sufficient detail or to anticipate the likely presence of heritage resources on the site may lead to a request for more detailed specialist information.

Provide a short history of the site and its environs (Include sources where available):

See attached Desktop Heritage Screening Assessment

Please indicate which heritage resources exist on the site and in its environs, describe them and indicate the nature of any impact upon them:

<input type="checkbox"/>	<p>Places, buildings, structures and equipment of cultural significance</p> <p>Description of resource:</p> <p>Description of impact on heritage resource:</p>
<input type="checkbox"/>	<p>Places to which oral traditions are attached or which are associated with living heritage</p> <p>Description of resource:</p> <p>Description of impact on heritage resource:</p>
<input type="checkbox"/>	<p>Historical settlements and townscapes</p> <p>Description of resource:</p> <p>Description of impact on heritage resource:</p>
<input checked="" type="checkbox"/>	<p>Landscapes and natural features of cultural significance</p> <p>Description of resource:</p> <p>Description of impact on heritage resource:</p>
<input type="checkbox"/>	<p>Geological resources of scientific or cultural importance</p> <p>Description of resource:</p> <p>Description of impact on heritage resource:</p>
<input checked="" type="checkbox"/>	<p>Archaeological resources (Including archaeological sites and material, rock art, battlefields & wrecks):</p> <p>Description of resource:</p>

	Description of impact on heritage resource:
<input checked="" type="checkbox"/>	<p>Palaeontological resources (ie: fossils):</p> <p>Description of resource:</p> <p>Description of impact on heritage resource:</p>
<input type="checkbox"/>	<p>Graves and burial grounds (eg: ancestral graves, graves of victims of conflict, historical graves & cemeteries):</p> <p>Description of Resource:</p> <p>Description of Impact on Heritage Resource:</p>
<input type="checkbox"/>	<p>Other human remains:</p> <p>Description of resource:</p> <p>Description of impact on heritage resource:</p>
<input type="checkbox"/>	<p>Sites of significance relating to the history of slavery in South Africa:</p> <p>Description of resource:</p> <p>Description of impact on heritage resource:</p>
<input type="checkbox"/>	<p>Other heritage resources:</p> <p>Description of resource:</p> <p>Description of impact on heritage resource:</p>

**Describe elements in the environs of the site that could be deemed to be heritage resources:
Description of impacts on heritage resources in the environs of the site:**

This application is for a proposed powerline associated with the Karreebosch Wind Energy Facility located in both the Western and Northern Cape. The Karreebosch WEF was previously referred to as Phase 2 of the Roggeveld WEF. SAHRA has made numerous comments on both the Roggeveld WEF and the Karreebosch WEF from 2013 with the last comment issued on 26 September 2018 (attached). EA was granted for the Karreebosch WEF on 29 January 2016. In the EA, various requirements were stipulated in terms of impacts to Historical, Cultural and Palaeontological sites. Much of the area proposed for the development of the powerline was assessed as part of the HIA completed for the Karreebosch WEF (Figure 2a and 2b) drafted by the ACO (Kendrick, 2015, SAHRIS Ref 183350). The remaining sections of the proposed powerline were assessed in the Heritage Assessments completed for the Roggeveld WEF (Hart and Webley, 2013, SAHRIS Ref 152531). The heritage information identified in these reports have been extracted and are mapped in Figure 3, 3a and 3b. These reports are also referred to below in order to provide a contextual analysis of the heritage sensitivity of the area proposed for development.

The area proposed for development has been previously assessed, more than once. In addition, the proposed powerline routes lie immediately adjacent to existing grid infrastructure. The original fieldwork conducted for the Roggeveld WEF HIA (2013) which covered the area proposed for development was comprehensive and remains relevant, similarly the fieldwork conducted for the Karreebosch WEF (2015). The Karreebosch HIA (2015) "revealed that the study area is relatively austere in terms of pre-colonial heritage, however valley bottoms contain evidence of early trekboer cultural landscapes – ruins, graves and occasional middens. These consist of collections of ruined stone and mud buildings, threshing floors and kraals located exclusively in the valley areas between the high longitudinal ridges that characterise the study area. There are a number of existing farm houses that contain 19th century fabric,

however very few of these have anything more than moderate heritage significance. Parts of the study area enjoy very high aesthetic qualities with the area known by locals as “Gods Window” having grade II aesthetic qualities, hence the significance of the study area lies mainly with its undeveloped wilderness qualities. Interestingly, pre-colonial or stone age heritage and archaeology is extremely scarce in the areas that were searched. Very few archaeological sites of these kinds were recorded despite the fact that overall 9 experienced archaeologists were involved in scouring the landscape.” The HIA for the Karreebosch WEF notes that “The most important colonial archaeological sites in the study area are associated with Ekkraal Valley, the Rietfontein-Wilgebosch River valley and the Krans Kraal-Karreekraal valley. The valley bottoms are archaeologically sensitive...”. Similar findings were made by ACO in their report (2010, SAHRIS Ref: 53187) over the development area (Figure 3, 3a and 3b). As the proposed powerline alternatives traverse the valley areas which have been determined to be archaeologically sensitive, it is likely that significant archaeological heritage resources may be impacted by the proposed development. Further specialist archaeological assessment is therefore recommended.

According to the SAHRIS Palaeosensitivity Map (Figure 4), the area proposed for the powerline development is underlain by sediments of very high palaeontological sensitivity belonging to the Abrahamskraal Formation of the Beaufort Group. A Palaeontological Assessment was conducted by Almond (2015) for the Karreebosch WEF which covers a larger portion of the area proposed for the powerline development, and covered the proposed powerline alternatives specifically (Figure 2b, Appendix to the ACO Report 2015, SAHRIS Ref 183350). According to Almond (2015), “The fluvial Abrahamskraal Formation (Lower Beaufort Group, Karoo Supergroup) that underlies almost the entire wind farm study area is known for its diverse fauna of Permian fossil vertebrates - notably various small- to large-bodied therapsids and reptiles - as well as fossil plants of the *Glossopteris* Flora and low diversity trace fossil assemblages. However, desktop analysis of known fossil distribution within the Main Karoo Basin shows a marked paucity of fossil localities in the study region between Matjiesfontein and Sutherland where sediments belonging only to the lower part of the thick Abrahamskraal Formation succession are represented. Bedrock exposure levels in the Karreebosch Wind Farm study area are generally very poor due to the pervasive cover by superficial sediments (colluvium, alluvium, soils, calcrete) and vegetation. Nevertheless, a sufficiently large outcrop area of Abrahamskraal Formation sediments, exposed in stream and riverbanks, borrow pits, erosion gullies as well as road cuttings along the R354, has been examined during the present fieldwork to infer that macroscopic fossil remains of any sort are very rare indeed here. Exceptions include common trace fossil assemblages (invertebrate burrows) and occasional fragmentary plant remains (horsetail ferns). Levels of tectonic deformation of the bedrocks are generally low and baking by dolerite intrusions (Early Jurassic Karoo Dolerite Suite) is very minor. It is concluded that the Lower Beaufort Group bedrocks in the study area are generally of low palaeontological sensitivity and this also applies to the overlying Late Cenozoic superficial sediments (colluvium, alluvium, calcrete, soils *etc.*)”

Dr Almond goes on to note that “No areas or sites of exceptional fossil heritage sensitivity or significance have been identified within the Karreebosch Wind Farm study area. The majority of fossil sites recorded in the study region lie outside the anticipated development footprint. The common trace fossil assemblages identified in this study are of widespread occurrence within the Abrahamskraal Formation (*i.e.* not unique to the study area). Construction of the Karreebosch Wind Farm and associated infrastructure is therefore unlikely to entail significant impacts on local fossil heritage resources; *i.e.* the impact significance of the wind farm project is assessed as MINOR. The impact significance of both transmission line route options to Komsberg Substation (Figure 2b) is likewise assessed as MINOR and there is no marked preference for either route option on palaeontological grounds. Irreplaceable loss of fossil heritage is not anticipated, although it should be highlighted that any new vertebrate fossil finds made during construction (*e.g.* exposed in new bedrock excavations) would be of considerable scientific interest, given their rarity.” According to the HIA for the Karreebosch WEF (ACO, 2015), “While the geology of the study area is potentially palaeontologically sensitive, very few fossils were found by either Dr Duncan Miller or Dr John Almond in

the study area. No further work in this respect is recommended, other than reporting of any finds during construction to the heritage authorities.” Due to the overlap in assessment areas (Figure 2b), these findings can be extrapolated to the current proposed powerline development. As such, it is recommended that little new information is likely to be gained by further palaeontological fieldwork. Potential impacts to palaeontological heritage can be mitigated through the inspection of final pylon footings by a palaeontologist prior to construction.

According to the ACO reports (2011, 2013 and 2015), parts of the study area enjoy very high aesthetic qualities hence the significance of the study area lies mainly with its undeveloped wilderness qualities which may be negatively impacted by the development of the proposed powerline. However, it must be noted that the proposed powerline is located within a Renewable Energy Development Zone which has been identified for this kind of development. In REDZ areas, there is a reasonable expectation that the cultural landscape of an area will be changed to be dominated, or at least heavily altered, by renewable energy development and its associated infrastructure. In fact, this is the intention of the REDZ areas. Furthermore, the proposed powerline is located within a suite of authorised renewable energy facilities (Figure 5) and as such, the impact of this proposed powerline on the cultural landscape is likely to be negligible. No further specialist cultural landscape assessment is therefore recommended.

Summary of anticipated impacts on heritage resources:

Based on the information available, it is likely that the proposed grid connection corridor will impact on significant archaeological heritage and as such, it is recommended that a Heritage Impact Assessment is conducted that complies with section 38(3) of the NHRA for the proposed development with special focus on impacts to significant archaeological heritage.

E. ILLUSTRATIVE MATERIAL:

Attach to this form a minimum A4 sized locality plan showing the boundaries of the area affected by the proposed development, its environs, property boundaries and a scale. The plan must be of a scale and size that is appropriate to creating a clear understanding of the development.

Attach also other relevant graphic material such as maps, site plans, satellite photographs and photographs of the site and the heritage resources on it and in its environs. These are essential to the processing of this notification.

Please provide all graphic material on paper of appropriate size and on CD/ USB in JPEG format. It is essential that graphic material be annotated via titles on the photographs, map names and numbers, names of files and/or provision of a numbered list describing what is visible in each image.

F. RECOMMENDATION

In your opinion do you believe that a heritage impact assessment is required? Yes No

Recommendation made by:

Name Jenna Lavin

Capacity Heritage Assessment Practitioner

PLEASE NOTE: No Heritage Impact Assessment should be submitted with this form or conducted until Heritage Western Cape has expressed its opinion on the need for such and the nature thereof.

G. INFORMATION TO BE PROVIDED AND STUDIES TO BE CONDUCTED AS PART OF THE HERITAGE IMPACT ASSESSMENT (HIA)

If it is recommended that an HIA is required, please complete this section of the form.

DETAILS OF STUDIES TO BE CONDUCTED IN THE INTENDED HIA

In addition to the requirements set out in Section 38(3) of the NHRA, indicate envisaged studies:

<input checked="" type="checkbox"/>	Heritage resource-related guidelines and policies.
<input type="checkbox"/>	Local authority planning and other laws and policies.
<input type="checkbox"/>	Details of parties, communities, etc. to be consulted.
<input checked="" type="checkbox"/>	Specialist studies, eg: archaeology, palaeontology, architecture, townscape, visual impact, etc. Provide details: Archaeology
<input type="checkbox"/>	Other. Provide details:

PLEASE NOTE: Any further studies which Heritage Western Cape requires should be submitted must be in the form of a single, consolidated report with a single set of recommendations. Specialist studies must be incorporated in full, either as chapters of the report, or as annexures thereto.
Please refer to the *Guidelines for Heritage Impact Assessments required in terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999)*