



Enquiries: Mariagrazia Galimberti
Tel: 021 462 4502
Email: mgalimberti@sahra.org.za
CaseID: 266

Date: Friday July 27, 2012

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Final Comment

In terms of section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention:

Mr Anton Hough
Coastal and Environmental Services
P.O. Box 934
Grahamstown
6140

PROPOSED DEVELOPMENT OF THE PLAN8 GRAHAMSTOWN WIND ENERGY PROJECT

Gess, R., December 2011. Proposed Infinite Plan 8 Grahamstown Wind Farm, Eastern Cape Province of South Africa.

Nilssen, P., December 2011. Proposed development of the Plan 8 Grahamstown Wind Energy Project: including Farms Gilead 361, Penynnes Kraal 362 and Tower Hill 363, Grahastown, Makana Municipality, Eastern Cape Province.

Plan8 Infinite Energy is proposing the establishment of a wind energy facility about 30 km east of Grahamstown, in the Makana Municipality.

A Scoping Report was submitted to SAHRA in January including an archaeological and a palaeontological impact assessment. No further studies were undertaken for the Environmental Impact Report.

The wind energy facility is proposed to have a generation capacity up to 67.5MW, with a maximum of 27 wind turbines distributed over about 2500ha. The entire area is characterised by undulate slopes and ridges, which are the preferred location for wind turbines.

The archaeologist warns that he was not able to survey the complete footprint of the development because of dense vegetation cover, however, after his survey he is confident that the general sensitivity of the area is low from an archaeological perspective. On the surveyed properties the specialist recorded a few *ex situ* Stone Age artefacts of low archaeological significance, two unmarked graves older than 80 years and an old and rusted horse/oxen drawn plough on Farm Gilead 361 and a cave with rock paintings on Peynes Kraal 362, known to the owner of the property.

The exact position of two wind turbines was changed between the scoping phase and the impact assessment phase, and therefore their footprint was not assessed. However, as mentioned above, the lack of significant material in proximity of these two turbines, and more in general in the entire surveyed area, does not warrant for a further assessments of the site.

Geologically the area is located 30km from Waterloo Farm, the black shale of which is considered as the most important Late Devonian palaeontological site in Africa. However, after the survey the palaeontologist concluded that the fossil significance of the footprint area of the wind energy facility is quite low, since the



The South African Heritage Resources Agency

Street Address: 111 Harrington Street, Cape Town 8000 * Postal Address: PO Box 4637, Cape Town 8000
* Tel: +27 21 462 4502 * Fax: +27 21 462 4509 * Web: <http://www.sahra.org.za>



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black shale of the Witpoort Formation deeply weathered here during the Tertiary and degraded into kaolin soft clay, which is currently exploited for mining along with silcrete.

The central part of the area is formed by quartzitic hills also derived from the degradation of the Witpoort Formation quartzite strata and here shallow-water ripples surfaces and ropy horizontal trace fossils were recorded; their significance is considered to be too low to engage into mitigation of the site.

The Witpoort Formation is in places overlain by fine grained brown shales of the Lake Mentz Subgroup, where only a few plant fragment fossils considered also to be of low significance were recorded.

Decision:

After considering the two impact assessments and the Environmental Impact Report SAHRA requires that:

- The two unmarked graves must be clearly demarcated and fenced off at least temporarily during construction. A fence must be placed around them, at least 5m from the perimeter of the graves.
- A buffer zone of 50m should be respected between the fence around the graves and the closest wind turbines, this buffer area may be reduced to 20m in the case of access roads.
- The old plough may be fenced off with the graves, however its exposure to the elements will undoubtedly continue its degradation. It is suggested that, if possible and if the landowner deems it suitable, the plough be moved under a covered area or indoor.
- While the rock art site is located in a gorge, and therefore not easily accessible from the ridges where the turbines will be located, it is recommended that the work force at the wind energy facility understands both the importance of the site from an archaeological perspective and why it should not be damaged.

If these recommendations are adhered to, the SAHRA Archaeology, Palaeontology and Meteorites Unit has no objections to the development. If any new evidence of archaeological sites or artefacts, palaeontological fossils, graves or other heritage resources are found during construction, SAHRA (Mariagrazia Galimberti/Colette Shceermeyer, Tel: 021 462 4502) and a professional archaeologist or palaeontologist, depending on the nature of the findings, must be alerted immediately.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully



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Mariagrazia Galimberti
Heritage Officer: Archaeology
South African Heritage Resources Agency



Colette Scheermeyer
SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:
(DEA, Ref: 12/12/20/2523)

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.



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