

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: 14224

Date: Friday November 22, 2019
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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: Umsobomvu Wind Power (Pty) Ltd

UMSOBOMVU INFRASTRUCTURE DEVELOPMENT, EASTERN AND NORTHERN CAPE PROVINCES. Umsobomvu Wind Power (Pty) Ltd., a subsidiary of EDF Renewables (Pty) Ltd, (the Applicant) is proposing the development of infrastructure, associated with the Umsobomvu I Wind Energy Facility (WEF), near Noupoot and Middelburg in the Pixley Ka Seme District Municipality (Northern Cape Province) and the Chris Hani District Municipality (Eastern Cape Province). The proposed infrastructure is located within Portion 8 of Uitzicht Farm, RE of Elands Kloof Farm and RE of Winterhoek Farm. The proposed Umsobomvu Infrastructure Development includes the following: * Creating a new access point and upgrading existing jeep tracks and farm roads to create new access road routes; * The construction of two (2) batching plants; * The construction of internal overhead lines with a 33 kV switching station of 20 m x 20 m; and * The construction of a collector substation.

EOH Coastal and Environmental Services have been appointed by Umsobomvu Wind Power (Pty) Ltd to undertake an Environmental Authorisation (EA) Application for the proposed associated infrastructure for the Umsobomvu Wind Facility, near Noupoot and Middelburg in the Eastern and Northern Cape Province.

It is noted that the proposed development falls within two provinces. SAHRA has jurisdiction to provide comments for the Northern Cape Province only in terms of section 38 of the National Heritage Resources Act, Act 25 of 1999 (NHRA). Comments for the Eastern Cape portion of the development must be sought from the Eastern Cape Provincial Heritage Resources Authority (ECPHRA).

A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, No 107 of 1998 (NEMA) and the NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include a new access point and amended access road routes, two batching plants, internal overhead powerline with a 33kV switching station of 20 m x 20 m and a collector substation.

Natura Viva cc and Umlando: Archaeological Surveys and Heritage Management were appointed to provide the heritage specialist component as part of the EA in terms of section 24(4)b(iii) of the NEMA and section 38(8) of the NHRA.



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Almond, J. E. 2018. Palaeontological specialist assessment: combined desktop and field-based study. Umsobomvu 1 Wind Energy Facility near Middelburg, Pixley ka Seme & Chris Hani District Municipalities, Northern and Eastern Cape.

The report assessed the entire WEF inclusive of the infrastructure developments and wind turbines. The impacts of the proposed infrastructure footprint are not made clear in the report. The entire proposed development area is underlain by the sediments of the Beaufort Group which include the Adelaide Subgroup and Katberg Formation which are known to contain fossils such as vertebrates, trace fossils and rarer vascular plant fossils. Several large vertebrate burrows were identified 100 m from the proposed access route. These formations are overlain by Late Caenozoic superficial deposits where no fossils were observed.

Recommendations provide in the report include the following:

- During the construction phase all deeper (> 1 m) bedrock excavations should be monitored for fossil remains by the responsible ECO;
- A Chance Fossil Finds Procedure is recommended;
- These mitigation recommendations should be incorporated into the Construction Environmental Management Programme (EMPr) for the Umsobomvu 1 Wind Energy Facility.

Anderson, G. 2018. Heritage Survey of the Umsobomvu 1 Wind Energy Facility, Eastern and Northern Cape.

The report assessed the entire WEF inclusive of the infrastructure developments and wind turbines. The impacts of the proposed infrastructure footprint are not made clear in the HIA. A total of 24 heritage resources were identified that include surface scatters of Stone Age lithics, rock art shelters, stone walls and historical structures.

In an Interim Comment issued on 06/09/2019, SAHRA requested that letters drafted by the appointed heritage specialists be submitted that clearly indicates the impact of the proposed infrastructure development on identified heritage resources. These letters were to include maps of the identified heritage resources relative to the proposed infrastructure footprints as detailed in the dBAR and contain specific recommendations for the development.

Since the issuing of the Interim Comment, letters from the specialists have been submitted.

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Almond, J. E. 2019. Palaeontological Heritage Resources Comment: Umsobomvu 1 Wind Energy Facility near Middelburg, Pixley ka Seme & Chris Hani District Municipalities, Northern and Eastern Cape (DEA Reference Number: 14/12/16/3/3/1/2040).

The letter notes the change in the layout of the certain elements of the proposed development and states that the previous conclusions of the 2018 PIA will remain the same. No map of the palaeontological resources has been provided, such as the Lystrosaurus, vertebrate burrows, plant material and possible tetrapod tracks in relation to the amended development layout. Nor has an impact assessment been conducted.

Anderson, G. 2019. Umsombomvu WEF Layout Revision.

The letter notes that changes in the layout of the certain elements of the proposed development and states that the previous conclusions of the 2018 HIA remain valid and that the amended layout will not affect any of the sensitive areas and/or heritage sites. No impact assessment has been conducted (i.e. instances where the author notes that the site is currently not affected, or if a road is built in the area etc) are not clear examples of impact assessments to heritage resources. Specific management measures, i.e. no-go buffer zones, monitoring and management procedures are expected to be provided here.

Interim Comment

The provided letters have not fully addressed our initial concerns raised in the previously issued Interim Comment. The following outstanding issues must be addressed before further comments are provided:

The PIA letter requires a map of identified palaeontological resources in relation to the proposed development layout and an impact assessment of the identified palaeontological resources.

The HIA letter requires an assessment of the impact to the identified heritage resources, with specific recommendations for management of these impacts. Additionally, the map provided on page three must be revised to provide greater clarity on the location of the resource relative to the proposed development i.e. zoom insert maps.

Additionally, the dBAR must be amended to include the above information.

Further comments will be issued upon receipt of the above documents.

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

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above in the case header.

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/527580>
(DEA, Ref: 14/12/16/3/3/1/2040)