

Our Ref:



an agency of the
Department of Arts and Culture

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CaseID: 14227

Date: Friday June 04, 2021
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Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Coleskop Wind Power (Pty) Ltd

Coleskop Infrastructure Development (DFFE Reference No.: 14/12/16/3/3/1/2039) Coleskop Wind Power (Pty) Ltd (the "Applicant"), a subsidiary of EDF Renewables (Pty) Ltd, is proposing the development of infrastructure associated with the authorised Coleskop Wind Energy Facility (WEF) near Noupoort and Middelburg in the Northern Cape and Eastern Cape Provinces. The Coleskop Infrastructure will include new and upgraded access roads, concrete batching plants, temporary laydown areas and construction areas, the construction of electrical infrastructure which includes an Operation and Maintenance Services (OMS) building, and two 500 m corridors for the construction of a 132 kV overhead line which will be routed from the Coleskop Onsite Substation to the authorised MTS Substation. This infrastructure is being proposed on portions of Uitzicht Farm 3, the Remaining Extent (RE) of Elands Kloof Farm 135, and the RE of Winterhoek Farm 118.

EOH Coastal and Environmental Services have been appointed by Coleskop Wind Power (Pty) Ltd to undertake an Environmental Authorisation (EA) Application for the proposed associated infrastructure for the Coleskop Wind Facility, near Noupoort 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 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 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. Coleskop 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 Coleskop Wind Energy Facility.

Anderson, G. 2018. Heritage Survey of the Coleskop 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 63 heritage resources were identified that include surface scatters of Stone Age lithics, rock art shelters, stone walls, historical structures and cemeteries.

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: Coleskop Wind Energy Facility near Middelburg, Pixley ka Seme & Chris Hani District Municipalities, Northern and Eastern Cape (DEA Reference Number: 14/12/16/3/3/1/2039).

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. Coleskop 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. Additionally, no map of the identified heritage resources relative to the proposed development footprint has been provided.

In an Interim Comment issued on the 22/11/2019, SAHRA stated that the provided letters did not address the initial concerns raised in the previously issued Interim Comment.

Since the issuing of the Interim Comment, SAHRA was notified that the EA application had been refused on 19/12/2019.

Since the refusal of the EA in 2019, an amended BAR has been submitted for comment, along with updated heritage assessments (06/05/2021).

Almond, J. E. 2021. Palaeontological Heritage Assessment: Desktop Study. Ancillary infrastructure for the Coleskop Wind Energy Facility near Middelburg, Pixley ka Seme & Chris Hani District Municipalities, Northern and Eastern Cape Provinces.

The proposed development footprint is underlain by potentially fossiliferous Permo-Triassic sedimentary rocks of the Beaufort Group and the unfossiliferous Karoo Dolerite suite, which are overlain by Late Cenozoic

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superficial sediments of low palaeosensitivity. No fossil sites are located within the development footprint for the ancillary infrastructure. A Chance Fossil Finds Procedure is recommended to be implemented and is provided in the report.

Anderson, G. 2021. Heritage Cover Letter and Impact Assessment: Umsombomvu WEF Layout Revision

Two heritage sites located in the Northern Cape will be impacted by the updated proposed development, namely the proposed road. One of the sites is a surface scatter of Middle Stone Age lithics of low significance. The second site is a group of labourers houses and other farm buildings of low-medium significance.

Recommendations provided in the report include the following:

- A 50 m buffer must be maintained around the sites;
- The buildings will need to be assessed by an architect historian for its full significance.
- A permit application is required to mitigate the impact to the Stone Age site.
- Areas around the some of the buildings have potential historical archaeological deposit and may need to be monitored if affected by servitudes.

The updated BAR includes the following recommendations for heritage resources:

- Monitoring of all substantial bedrock excavations for fossil remains by the ECO, with reporting of new palaeontological finds (notably fossil vertebrate bones and teeth) to ECPHRA (Eastern Cape) or SAHRA (Northern Cape) for possible specialist mitigation;
- Should the proposed road upgrade affect the UMZ014 heritage site, a permit will be required prior to the commencement of the construction phase;
- There must be no damage to the WILGEFONTEIN buildings. These sites must be monitored during construction and possible excavations.
- The necessary permits must be obtained from SAHRA prior to the commencement of vegetation clearing.
- Any houses and/or walling which is situated within 50 m of the infrastructure development footprints must be demarcated before the commencement of construction related activities.
- No infrastructure may occur within 20 m of walling.
- All identified sites, which have been identified in the Archaeological Assessment Report, must be monitored by an archaeologist during the construction phase.



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Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations provided by the heritage specialists and within the BAR are supported and must be adhered to. Specific conditions are provided for the development as follows;
- A monitoring report by the ECO on all substantial excavations must be submitted to SAHRA upon completion of the construction phase;
- Should it not be possible to avoid the identified archaeological heritage site, a permit in terms of section 35 of the NHRA and Chapter II and IV of the NHRA regulations must be applied for from SAHRA prior to the construction phase. No mitigation may occur without a permit issued in this regard;
- An archaeological monitoring report conducted by the appointed qualified archaeologist must be submitted to SAHRA upon completion of the construction phase;
- Permits pertaining to all heritage resources protected in terms of section 34 of the NHRA must be sought from the Northern Cape Provincial Heritage Resources Authority;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as

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possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

- The Final EIA and EMPr must be submitted to SAHRA for record purposes;
- The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

Should you have any further queries, please contact the designated official using the case number quoted 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: <https://sahrissahra.org.za/node/527596>
(DEA, Ref: 14/12/16/3/3/1/2039)

Terms & Conditions:

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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.