

Relocation of the authorised Main Transmission Substation (MTS) and co-ordinates associated with the authorised electrical grid infrastructure to support the authorised Sutherland, Sutherland 2 and Rietrug Wind Energy Facilities (WEF's), Northern Cape and



an agency of the
Department of Arts and Culture

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CaseID: 16771

Date: Thursday August 05, 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: South Africa Mainstream Renewable Power Developments (Pty) Ltd

P.O. Box 45063
Claremont
7753

The Final Basic Assessment report submitted to DFFE in 2019 indicates that proposed 132kV powerline, MTS and 400kV powerline were assessed within a 500m corridor. At the time of the assessment it was indicated that the location of the MTS within this authorised grid connection corridor was not considered to be an ideal location for the MTS as it had been positioned in an area with hills and numerous small drainage lines leading off the slopes onto the adjacent plains. The assessment indicated that a significant amount of earth moving and levelling would be required to prepare the site. Following considerations of the technical aspects of the project by the Developer regarding the relocation of the MTS for the development as part of the more detailed design of the facility, it has been concluded that the new location sited within the authorised grid corridor is considered as the most feasible location for the MTS on PTN 7 FARM 16, HAMEL KRAAL, LAINGSBURG MUNICIPALITY, WESTERN CAPE PROVINCE.

Nala Environmental Consulting Firm has been appointed by South African Mainstream Renewable Energy Developments (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application process for the relocation of the authorised 400kV Main Transmission Substation associated with the Grid connection for the Sutherland Cluster Wind Energy Facilities in the Northern and Western Cape Provinces.

A draft Motivation Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed amendments will include the relocation of the substation further south within the authorised 500 m 400kV grid corridor and an amendment to the start and end co-ordinates of the powerlines. It is noted that the substation is located within the Western Cape Province, therefore SAHRA will only provide comments regarding the powerline route. Comments must be sought from Heritage Western Cape regarding the substation.

A previous SAHRIS Case application has reference i.e. SAHRIS Case ID 10494

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<https://sahris.sahra.org.za/cases/ba-process-proposed-construction-electrical-grid-infrastructure-support-rietrug-wind-energy>). In a Final Comment issued on the 01/09/2017, SAHRA noted no objections to the proposed development within the Northern Cape and provided conditions (<https://sahris.sahra.org.za/node/407516>).

Natura Viva CC and ASHA Consulting was appointed to provide heritage input into the EA Amendment Application process as per section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) and section 24(4)b(iii) of NEMA. The specialists assessed the change in location of the substation located in the Western Cape, as no change to the route of the powerline section within the Northern Cape will occur. The reports will not be discussed below.

The draft Motivation report notes the location of three heritage site previous identified within the 500 m corridor in the Northern Cape section of the powerline and notes that a 30 m buffer zone will be adhered to around each one.

Final Comment

The following comments are relevant only for the Northern Cape section of the powerline and 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 Motivational Report and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed amendment;
- 38(4)b – The recommendations contained within the draft Motivational Report are supported. Additional conditions for the development include:
 - The conditions provided in the previously issued Final Comment i.e. SAHRIS Case ID 10494 (<https://sahris.sahra.org.za/node/407516>) are still valid and must be adhered to;
- 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

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- 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA with regards to offences;
 - 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 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 Motivational Report and EMPr must be submitted to SAHRA for record purposes;
 - The decision regarding the EA Amendment 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

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ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/577572>
(DEA, Ref: 14/12/16/3/3/1/2077)

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.