

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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Enquiries: Natasha Higgitt
Tel: 021 462 4502
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CaseID: 17107

Date: Friday October 08, 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 applicant is proposing the upgrade and widening of a portion of the existing access road to the authorised Sutherland Wind Energy Facility located in the Northern Cape Province.

Nala Environmental Consulting has been appointed by Sutherland Wind Farm (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application for the upgrade of the existing access road to the authorised Sutherland Wind Energy Facility, near Sutherland, Northern Cape Province.

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 upgrade will include the upgrade and widening of 10 km portion of the access road.

Previous SAHRIS Applications relevant to this case include: Case ID 9622

(
<https://sahris.sahra.org.za/cases/amendment-application-proposed-splitting-sutherland-renewable-energy-facility-three-140-mw>), Case ID 10500

(
<https://sahris.sahra.org.za/cases/ea-amendment-process-sutherland-wind-energy-facility-wef-northern-and-western-cape-provinces>) and Case ID 14522

(
<https://sahris.sahra.org.za/cases/amendment-no-3-environmental-authorisation-sutherland-wef-near-sutherland-nc>). The Interim Comment issued on Case ID 9622 has not yet been complied with.

Natura Viva CC and ASHA Consulting (Pty) Ltd was appointed to provide heritage specialist input as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).



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Almond, J. E. 2021. Palaeontological Assessment: Combined Desktop & Field-Based Assessment Proposed Upgrade of the Access Road to the Authorised 140 MW Sutherland Wind Energy Facility, Sutherland Magisterial District, Northern Cape.

The development footprint is underlain by sedimentary rocks of the upper Abrahamskraal Formation which is known to contain fossils such as the dicynodont therapsids, tetrapod burrow casts, trace fossils and plant remains. Given the small footprint of the access road, the impact of the development is assessed as negative low.

The cumulative assessment notes that outstanding walkdowns of access roads within the Sutherland and Rietrug WEF have made it difficult to meaningfully assess the cumulative impacts to palaeontological heritage however, it is provisionally concluded that the impact is of negative medium significance without mitigation, which would fall to negative low provided that the proposed palaeontological mitigation measures are fully implemented.

Recommendations provided in the report include the following:

- In accordance with the EMPs for the authorised Sutherland WEF and Rietrug WEF, sectors of the access road within the WEF project areas should be surveyed by a qualified palaeontological specialist, with recommendations for palaeontological mitigation (if any is necessary) to be submitted for comment to SAHRA;
- A Chance Fossil Finds Procedure is recommended to be implemented and is provided in the report.

Orton, J. 2021. Heritage Impact Assessment: Proposed Road Upgrade to access the Sutherland Wind Energy Facility, Sutherland Magisterial District, Northern Cape.

A total of six (6) heritage resources were identified as part of the HIA. These include sites of low heritage significance such as a drystone wall and substantial culvert with four arched tunnels, sites of low-medium significance such as a stone packed kraals, one historical settlement of medium heritage significance and a farm complex of high heritage significance.

Recommendations provided in the report include the following:

- It is suggested that a minimum of 5 m be respected between the sites and the proposed new road

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surface edge;

- An archaeologist should, in conjunction with the ECO, mark out the no-go areas around the archaeological sites with a minimum 5 m buffer where possible. These areas must be monitored by the ECO;
- If avoidance is not possible in any areas (as may be the case at waypoint 578), then an archaeologist will need to be contracted to record the structure in detail as well as any artefacts associated with it. If there is a danger that the stone walling may be undermined through later erosion after the completion of roadworks then the site should be properly recorded just in case;
- Landscape scarring, especially in the area along the Riet River, must be minimised;
- To protect the drystone walling, no work may take place east of the current road surface along the Riet River;
- Excavated materials from the road cuttings should not be disposed of over the eastern edge of the road; and
- If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

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 EMP:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows;
- Roadside crash barriers must be installed between the road and the edge of identified sites as part of the 5 m buffer recommended by the heritage specialist. These barriers must be monitored and replaced when damaged;
- If it not possible to avoid site 578, a permit in terms of section 35 of the NHRA must be applied for prior to the construction phase. No construction may occur until the permit has been received and all conditions met;

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- No stormwater runoff may be allowed to be channelled into or within 5 m any of the identified heritage sites. Storm water infrastructure must be designed to ensure no runoff from the road during the construction or operational phase occurs;
- Monitoring reports from the ECO during the construction phase must be submitted upon completion of the construction phase;
- Monitoring during the rainy season of any runoff from the road into the identified sites must be conducted by the ECO and if any adverse impacts such as erosion occur, reports must be submitted to SAHRA for further comment and recommendations;
- The Interim Comment for Case ID 9622 must still be complied with;
- 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 of the NHRA for offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - 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 Motivation 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

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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://sahris.sahra.org.za/node/582520>
(DEA, Ref: 12/12/20/1782/2)

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.