

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
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 18203

Date: Wednesday September 14, 2022
Page No: 1

Final Comment

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

Attention: SLR Consulting (South Africa) (Pty) Ltd

Red Cap Energy (Pty) Ltd ('Red Cap') is proposing to develop four Wind Farms and associated grid connections (together referred to as the Hoogland Project) in an area located between Loxton and Beaufort West in the Western Cape Province. Hoogland 1 and 2 are located to the north closer to Loxton and form the Northern Cluster of Wind Farms that will share a grid connection named the Hoogland Northern Grid Connection. Hoogland 3 and 4 are located closer to Beaufort West and comprise the Southern Cluster which will similarly share a separate grid connection, named the Southern Grid Connection This application is for the Hoogland Northern Wind Farm Cluster (Hoogland 1 Wind Farm and Hoogland 2 Wind Farm), which is subject to a Scoping and EIA process. Even though these are two separate applications they are being considered in the same EIA Report. The Department of Forestry, Fisheries and the Environment (DFFE) has granted Red Cap permission to combine the two Wind Farms into one Environmental Authorisation Application processes under Regulation 11 (1) of GN R. 982. It is proposed that each wind farm will comprise of up to 60 turbines with a targeted nameplate generation capacity of a maximum of 420MW. The entire footprint for each respective wind farm falls within the Western Cape Province, however, some watercourse crossing upgrades on existing roads fall within the Northern Cape and are under the jurisdiction of SAHRA. A supplementary specialist report was compiled to assess the watercourse crossing upgrades required on Northern Cape roads as shared infrastructure for the Hoogland Northern Projects, the findings of which have been incorporated into and presented within the EIA report.

SLR Consulting (South Africa) (Pty Ltd) has been appointed by Red Cap Hoogland 1 (Pty) Ltd and Red Cap Hoogland 2 (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Red Cap Hoogland Northern Wind Farm Cluster between Loxton, Northern Cape Province and Beaufort West, Western Cape Province (Hoogland 1: 14/12/16/3/3/2/2147 and Hoogland 2: 14/12/16/3/3/2/2146).

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the construction of 94 and 82 turbines respectively for each facility including infrastructure such as underground cables, on-site substation, battery energy storage system, turbine foundations, transformers at each turbine, workshop and laydown areas, hardstands at each turbine, operation



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and maintenance buildings, office stores, service and access roads, stormwater infrastructure, gates, temporary site camps, concrete batching plant, crane boom and blade laydown areas. It must be noted that the majority of both developments is located in the Western Cape. The only development activities located in the Northern Cape include stream crossing upgrades, which are shared activities for both EA applications. This comment pertains only to the stream crossing upgrades located within the Northern Cape Province.

Natura Viva CC and ASHA Consulting have been 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).

Almond, J. E. 2022. Proposed Hoogland Wind Farms and Grid Connection Project Northern Cluster: Hoogland 1 Wind Farm, Hoogland 2 Wind Farm and Associated Hoogland Northern Grid Connection, Western Cape Province: Palaeontological Heritage.

The proposed development area is underlain by the lower Beaufort Group of Middle to Late Permian age. Several fossils were identified within streams in the Western Cape section of the development area which include several skulls and post-cranial skeletal remains of tetrapods, numerous tetrapod burrow casts and a low diversity of trace fossils which were concluded to be of limited scientific or conservation value. The area in which the stream crossings are located were not assessed as part of the PIA as these activities were added after the completion of the PIA.

Recommendations provided in the report include the following:

- The final, authorised layout of the Hoogland Wind Farm and Grid Connection projects should be crosschecked against the available fossil database and other relevant resources (e.g. satellite imagery, geological maps) by the palaeontological specialist who should make recommendations for pre-construction phase mitigation, if any proves necessary. This might entail, for example, focused palaeontological walk-downs of selected, previously unsurveyed and potentially sensitive sectors of the project footprint with judicious sampling or collection of threatened fossil material of scientific and / or conservation value;
- Application of Chance Fossil Finds Protocol by the ECO and palaeontological specialist during the construction phase (See Appendix 4).

Orton, J. 2022. Heritage Impact Assessment: Proposed Hoogland 1 Wind Farm and Hoogland 2 Wind Farm, Beaufort West Magisterial District, Western Cape.



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Only the results of the survey at the stream crossings will be discussed here. One of the stream crossings includes a concrete bridge dated to 1952, making the bridge 70 years old and thus protected by section 34 of the NHRA. The report noted the bridge as a heritage resource of very low cultural significance and required no further study.

In an Interim Comment issued on the 26/05/2022, SAHRA requested that a field based PIA of the stream crossings in the Northern Cape section be conducted as part of the EIA phase as fossils have been identified in streams in the Western Cape section of the development. A letter of response to the Interim Comment has been uploaded to the Heritage Report file on the case (03/06/2022).

Almond, J. E. 2022. Northern Cape Palaeontological Heritage Input: Hoogland 1 Wind Farm and Hoogland 2 Wind Farm between Loxton and Beaufort West, Western and Northern Cape Provinces.

The specialist noted that the appointed archaeologist inspected the proposed stream crossings who stated that the crossings are unlikely to have good exposure of the Beaufort Group bedrock or older consolidated alluvium, in which fossils are likely to occur.

The specialist continues to state that the recommendations of the original PIA state that a walkthrough of the final layout of the development is to be conducted once the layout is finalised, and that the stream crossings could be inspected at that time, to save on time and expenses.

In an Interim Comment, SAHRA stated that the motivation for no field-based PIA to be conducted of the stream crossings during the EIA phase of the EA application is not accepted. Since the issuing of the Interim Comment, a field-based PIA has been submitted to the case along with the Draft EIA (16/08/2022).

Butler, E. 2022. Palaeontological Impact Assessment Hoogland Northern Wind Farm Cluster Northern Cape Watercourse Crossing Upgrades.

The proposed development footprint is underlain by the Abrahamskraal Formation and Poortjie Member of the Adelaide Subgroup and Cenozoic superficial deposits. Fragmented imprints of plant fossils were identified within the vicinity of Crossing DR2314-1, a well preserved tetrapod skull and skeleton was identified at Crossing DR02314-2 & 3, ripple marks on loose slabs were identified at Crossing R381-5 and fragmented fossils of vertebrate skeletal bones and trace fossils were identified at Crossing R381-6.

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Recommendations provided in the report include the following:

- A well-preserved tetrapod skull and skeleton were observed near crossing DR023142&3 (-31.819436; 22.089300). Mitigation of this specimen is recommended;
- The Environmental Control Officer (ECO) for this project must be informed that sediments of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) have a Very High Palaeontological Sensitivity. Training of accountable supervisory personnel (ECO) by a qualified palaeontologist in the recognition of fossil heritage is very important and necessary;
- If Palaeontological Heritage is uncovered during surface clearing and excavations the Chance Finds Protocol attached should be implemented immediately. Fossil discoveries ought to be protected and the ECO/site manager must report to South African Heritage Resources Agency (SAHRA) (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can be carried out;
- Before any fossil material can be collected from the development site the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet the minimum standards for palaeontological impact studies proposed by SAHRA (2012);
- These recommendations should be incorporated into the Environmental Management Programme for the proposed development.

Final Comment

*These comments are only valid for the Northern Cape section of the development.

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 EIA 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:
- A permit in terms of section 35 of the NHRA and Chapter II and Chapter IV of the June 2000

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Regulations must be applied for from SAHRA in order to mitigate the tetrapod fossil;

- 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/ Ngqalabutho Madida 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 regarding offences;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
- With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;
- 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 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

Hoogland 1 Wind Farm and Hoogland 2 Wind Farm between Loxton and Beaufort West, Western Cape Provinces

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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/594209>
(DEA, Ref: 14/12/16/3/3/2/2147 & 14/12/16/3/3/2/2146)

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.