



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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CaseID: 19073

Date: Wednesday August 17, 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: ENERTRAG South Africa (Pty) Ltd

The proposed Project involves the development of a Wind Energy Facility (WEF) comprising up to 26 Wind Turbines with a combined generation capacity of up to 200MW.

Cabanga Environmental has been appointed by ENERTRAG South Africa (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Hendrina South Wind Energy Facility near Hendrina, Mpumalanga Province (REF: 14/12/16/3/3/2/2131).

A draft Environmental Impact Assessment (EIA) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations. It must be stated that SAHRA was not consulted during the Scoping phase of the EA application.

The proposed activities include the construction of 26 turbines and supporting infrastructure including a substation with battery energy storage system, operation and maintenance building, temporary construction camps and cement batching plants, temporary laydown areas and internal roads and cables.

Prof Marion Bamford and Beyond Heritage have been appointed to provide heritage specialist input into the EA process as per section 24(4)b(iii) of the NEMA and section 38(3) and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Bamford, M. 2022. Palaeontological Impact Assessment South Wind Energy Facility, Hendrina, Mpumalanga Province

The proposed development area is underlain by non-fossiliferous dolerite and on potentially very highly fossiliferous shales of the Vryheid Formation. No fossils were identified as part of the field assessment. A Fossil Finds Procedure is recommended to be added to the EMPr.

Van der Walt, J. 2022. Heritage Impact Assessment for the proposed Hendrina South Wind Energy Facility, Mpumalanga Province.



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Page No: 2

A total of eight heritage resources were identified within the proposed development footprint. These include four sites of clusters of historical ruins of low heritage significance with the caveat that infant and child burials may be located within and adjacent to the structures and therefore would be of high heritage significance, one large, ruined farmstead of medium heritage significance, and three burial grounds of high heritage significance.

Recommendations provided in the report include the following:

- Implementation of the ENERTRAG Chance Find Procedure for the project (Appendix A);
- Avoidance of burial sites (Waypoint 081 and 087) with a 50 m buffer and access for family members;
- WTG 15 will directly impact on the burial site at Waypoint 099 and it is recommended that this turbine should be moved to avoid the feature with a 50 m buffer zone;
- Identified ruins (Waypoint 067 – 072, 083 – 086 and 073 – 080) should be indicated on development plans and avoided during construction;
- Based on the potential risks associated with Construction Camp and Batching Plant Option 2 it is recommended that this option is avoided due to the presence of a burial site (Waypoint 081) and ruins (Waypoint 073 – 080);
- An access protocol must be developed for the project to ensure access to grave for family members;
- Preconstruction heritage walk down of the final layout.

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 EIA and EMP:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit and Burial Grounds and Graves (BGG) 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:
- The walkdown report must be submitted to SAHRA for comment prior to construction. No construction may commence without comment from SAHRA in this regard;
- BGG Unit conditions: All known/suspected burial sites must be clearly demarcated and monitored for the duration of the construction;
- A no-go buffer zone of 30 m must be maintained around the cluster of sites (083 – 086) of medium

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Page No: 3

significance;

- 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/Ngqabutho 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:
- 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

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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Page No: 4

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/601316>

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.