

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
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Enquiries: Natasha Higgitt
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CaseID: 19572

Date: Monday March 13, 2023
Page No: 1

Final Comment

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

Attention: SiVEST SA (Pty) Ltd

Proposed Development of the Klipkraal Wind Energy Facility (WEF) 1 and Associated Infrastructure near Fraserburg in the Northern Cape Province

Sivest SA (Pty) Ltd has been appointed by Klipkraal Wind Energy Facility 1 (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Klipkraal Wind Energy Facility 1, near Fraserburg, Northern Cape Province.

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 up to 60 turbines, permanent compacted hardstanding areas/platforms per wind turbine and turbine foundations, electrical transformers at each turbine, step-up/collector substations, main transmission substation (120 ha), underground cables or overhead where required, 400 KV powerline, battery energy storage system, internal access roads, temporary staging areas per turbine, temporary construction camps, office, accommodation, visitors centre and, an operation and maintenance building, septic tank and soak-away systems, fencing, potential new boreholes, temporary water storage tanks within an overall application area of 1 362 ha.

PGS Heritage (Pty) Ltd was appointed to provide heritage specialist input into the EA process 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).

Mann, N. 2022. Heritage Scoping Report. Proposed Construction of the Klipkraal Wind Energy Facility 1, near Fraserburg, Northern Cape Province, South Africa.

A total of two heritage resources were identified within the proposed development footprint. These include one stone shepherds shelter of low heritage significance and one stone ruin farmstead of medium heritage significance. It is noted that a full Palaeontological Impact Assessment will be conducted as part of the EIA phase.

Recommendations provided in the report include the following:



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- 30m buffer zone around historical structures;
- Given the fact that the level of coverage of the initial assessment survey in September 2021 was quite thin, it is essential that a walk down survey of the final footprint of the new Klipkraal WEF 1 and associated grid connection infrastructure be conducted;
- A management plan for the heritage resources then needs to be compiled and approved for implementation during construction and operations.

In an Interim Comment issued on the 17/10/2022, SAHRA noted the pending Palaeontological Impact Assessment and requested that a more comprehensive site visit be conducted as part of a revised HIA. Since the issuing of the Interim Comment, an updated HIA and PIA have been submitted with the draft EIA (09/03/2023).

Butler, E. 2022. Palaeontological Impact Assessment: Proposed Development of the Klipkraal Wind Energy Facility (WEF) 1 and Associated Infrastructure near Fraserburg in the Northern Cape Province

The proposed development area is underlain by the highly sensitive Adelaide Subgroup and unfossiliferous Jurassic Dolerite. The site visit was conducted in 2021 when the layout of the facility was not yet known. Fossils that were identified include a skull and weathered skeleton of a Dicynodont, well preserved tetrapod skeleton and fragments vertebrate skull and skeleton.

Recommendations provided in the report include the following:

- A Palaeontological Walkdown of the development is conducted pre-construction once the final design details are available;
- A Chance Finds Protocol must be implemented.

Mann, N. 2022. Heritage Impact Assessment. Proposed Construction of the Klipkraal Wind Energy Facility 1, near Fraserburg, Northern Cape Province, South Africa.

A total of eight (8) additional heritage resources were identified as part of the updated survey. These include stone features, stone shepherd shelters, low density surface Stone Age lithic scatters and findspots of low heritage significance and one farmstead of medium heritage significance.

Recommendations provided in the report include the following:



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- 30m buffer zone around historical structures;
- It is essential that a walk down survey of the final footprint of the new Klipkraal WEF 1 and associated grid connection infrastructure be conducted;
- A management plan for the heritage resources then needs to be compiled and approved for implementation during construction and operations.

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 EMPr:

- 38(4)a – The SAHRA 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:
 - Walkdown reports from the palaeontologist and archaeologist must be submitted to SAHRA prior to construction for comment. No construction may occur without SAHRA comments in this regard. Both of the walkdown reports must include tracklogs of the walkdown, maps of the identified heritage resources in relation to the authorised layout of all infrastructure, with recommendations per identified resource. Should permit applications in terms of section 35 of 36 of the NHRA be required for any mitigation, the relevant permit applications must form part of the walkdown reports. No mitigation work may occur without permits issued in this regard. Permits in terms of section 34 of the NHRA must be submitted to the NCPHRA for decision making;
 - A Heritage Management Plan must be included in the EMPr and submitted to SAHRA for comment;
 - SAHRA reserves the right to impose additional conditions on the development based on the results of the walkdowns. SAHRA reserves the right to object to the development based on the result of the walkdowns;
- 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 (Natasha Higgitt 021 202 8660/ nhiggitt@sahra.org.za) 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)

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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:
- 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

Natasha Higgitt
Manager: Development Applications Unit
South African Heritage Resources Agency

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ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/605349>
(DEA, Ref:)

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.