

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
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: 021 202 8660
Email: nhiggitt@sahra.org.za
CaseID: 20789

Date: Wednesday April 26, 2023
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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: Lance Blaine
Red Cap Hoogland 1 (Pty) Ltd

Red Cap Hoogland 1 (Pty) Ltd (Red Cap) proposes a new 400 kV grid connection from the authorised Nuweveld Wind Farm Development Collector Substation to the 132/400 kV Gamma Substation (~90 km to the east) (the project). The project is intended to expand the capacity of the Eskom grid and improve grid functionality in the area. Gridline access tracks for construction and maintenance also form components of the project. Located in the Western Cape (Central Karoo District Municipality and Beaufort West Local Municipality), portions of the line will traverse land in the Northern Cape (Pixley ka Seme District Municipality and Ubuntu Local Municipality).

CEN Integrate Environmental Management Unit has been appointed by Red Cap Hoogland 1 (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Gamma 400KV Gridline project located near Three Sisters, Northern Cape Province (DFFE Reference Number: 14/12/16/3/3/1/2710).

A draft Basic Assessment Report (DBAR) 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 overhead powerline with a 55m servitude, access roads and tracks and temporary laydown areas. The powerline is estimated to be 110 km long.

A small portion of the proposed powerline is located in the Western Cape. SAHRA does not have jurisdiction to provide comments for development applications located in the Western Cape. This comment pertains to the Northern Cape section of the proposed development only.

Almond, J. E. 2023. Palaeontological Heritage Proposed Gamma 400 kV Gridline Project

The proposed development is underlain by the Teekloof Formation and Late Cenozoic superficial sediments.

Recommendations provided in the report include the following:

- Avoidance of Very High Palaeosensitivity areas identified during the Screening Phase, which includes the slopes of Vaalkop on Farm Leeukloof 43 (red polygon, incorporating a buffer zone, in satellite map



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Figure 6-2), previously identified as a Very High Palaeosensitivity research area for the Hoedemaker Member within the Nuweveld East Wind Farm project area (Almond 2020a) (In contrast, any new High Sensitivity areas identified during the proposed pre-construction walkdown can be effectively mitigated during the Pre-Construction or Construction Phases through professional recording and collection and so need not be avoided);

- A pre-construction walkdown of potentially sensitive sectors of the project footprint - as identified from satellite imagery and the existing fossil database - by a palaeontological specialist. Palaeontological sites of scientific / conservation value should be recorded and, if feasible, collected together with pertinent field data, with recommendations for further mitigation measures – if any are necessary. Micro-siting of grid infrastructure is very unlikely to be required;
- Chance Fossil Finds Protocol is recommended to be implemented.

Orton, J. 2023. Heritage Impact Assessment: Proposed Gamma Gridline Corridor, Western and Northern Cape

A total of 54 heritage resources were identified within the proposed development footprint (Northern Cape section). These include engraved dolerite boulders and stone walled structures of very low heritage significance, stone walled enclosure, engravings and brick ruins of low heritage significance, stone-walled ruins and features, brick structures, historical dump and engraved dolerite boulders of medium heritage significance, and engraved dolerite boulders, farmsteads and burial grounds of high heritage significance.

Recommendations provided in the report include the following:

- Section 5.8 of the HIA includes mitigation measures for heritage resources;
- Table 8 of the HIA includes actions to be included in the EMPr;
- A pre-construction archaeological survey should be carried out along the entire alignment, including new access roads and construction camps;
- Sensitive ridges, hills, river valleys and steep slopes as indicated by the visual consultants must be avoided;
- Existing roads must be used for construction and operation as much as possible;
- Construction laydown areas must be located in areas of low visual sensitivity as identified by the visual consultants;
- All disturbed areas not required during operation must be rehabilitated; and
- If any archaeological material or human burials are uncovered during the course of development then

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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

*This comment pertains to the Northern Cape section of the proposed development only.

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 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;
- The recommended archaeological and palaeontological preconstruction surveys must be conducted by qualified archaeologist and palaeontologist and must be conducted prior to any ground clearance. The reports of the surveys must be submitted to SAHRA for comment prior to any ground clearance. No ground clearance of construction may occur on site without comments from SAHRA;
- SAHRA reserves the right to stipulate additional conditions, layout changes or object to the development based on the results of the preconstruction surveys;
- 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) 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/Nggabutho 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;

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- 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 BAR 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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/613695>
(DFFE, 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.

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3. SAHRA reserves the right to request additional information as required.