



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

Date: Thursday June 30, 2016

Page No: 1

Email: nhiggitt@sahra.org.za

CaseID: 9103

Final Comment

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

Attention: EOH Coastal & Environmental Services (CES) - Cape Town
The Point, Suite 408,
4th Floor, 76 Regent Road, Sea Point

EOH Coastal & Environmental Services is undertaking a Scoping & Environmental Impact Assessment for the proposed Brandvalley Wind Energy Facility bordering the Western and Northern Cape Provinces.

EOH Coastal and Environmental Services were appointed by Brandvalley Wind Farm (Pty) Ltd to conduct an Environmental Impact Assessment (EIA) process in support of an Environmental Authorisation Application for the proposed Brandvalley Wind Energy Facility (WEF), on several farms located in the Western and Northern Cape Provinces. A draft EIA was conducted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations, 2014. The proposed 140MW WEF will consist of 70 turbines with foundations measuring 25 m in diameter and 4 m in depth. Associated infrastructure will include an on-site substation, laydown area per turbine (70 m x 50 m), electrical turbine transformers, underground cabling, access roads 12 m wide, overhead powerlines, and a grid connection (part of two separate Basic Assessment processes). Temporary infrastructure will include a 10 ha construction camp and a 1 ha on-site concrete batching plant. Celeste Booth was appointed to conduct the Archaeological Impact Assessment (AIA) and John Almond was appointed to conduct the Palaeontological Impact Assessment (PIA) for the project.

SAHRA cannot comment on the sections of the proposed project located within the Western Cape. Nine of the proposed turbines are located within the Northern Cape. Comments for the Western Cape sections of the development must be sought from Heritage Western Cape (HWC). The discussion and comments below pertain only to the Northern Cape section of the development.

Booth, 2016. A Phase 1 Archaeological Impact Assessment (AIA) for the Proposed Brandvalley Wind Energy Facility (WEF) situated in the Karoo Hoogland Local Municipality (Namakwa District Municipality), the Witzenburg Local Municipality (Cape Winelands District Municipality) and Laingsburg Local Municipality (Central Karoo District Municipality).

No heritage resources were identified within the development footprint in the Northern Cape section of the proposed WEF. It must be noted that no track logs were submitted as part of the report; however, the photographs provided in the report indicate a sufficient coverage of the project area.



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Recommendations provided in the report include the following:

- No further studies or mitigation is required, unless the layout of the turbines and associated infrastructure is altered;
- The upgrade/construction of the internal access roads should be limited to the existing internal roads as far as possible;
- An archaeological heritage walk-down survey must be conducted if any changes of the wind turbines, associated infrastructure and roads outside the scope of this study are made for the final layout and further recommendations and mitigation measures be suggested if necessary;
- If concentration of historical and pre-colonial archaeological heritage material and/or human remains (including burials and graves) are uncovered during construction, all work within close vicinity of the find must cease immediately and be reported to SAHRA so that systematic and professional investigation/excavation can be undertaken. Phase 2 mitigation in the form of test-pitting/sampling or systematic excavation and collections of the pre-colonial shell middens and associated artefacts will then be conducted to establish the contextual status of the sites and possibly remove the archaeological deposit before development activities within the specific area can continue; and
- Construction managers/foreman and/or the Environmental Control Officer (ECO) should be informed before construction starts on the possible types of heritage sites and cultural material they may encounter and the procedures to follow when they finds sites.

Almond, 2016. Palaeontological Heritage Assessment: Combined Desktop & Field-Based Study - Proposed Brandvalley Wind Energy Facility Laingsburg, Western & Northern Cape Provinces

The Northern Cape section of the proposed project area is underlain by the Abrahamskraal Formation. One occurrence of plant stem casts or burrows (Loc 194) was identified within the Abrahamskraal Formation on the farm Rietfontein 197. This occurrence appears to be located approximately 100m from Turbine 42 and should not be impacted by construction activities. Recommendations provided in the report include monitoring of all major surface clearance and deeper (>1 m) excavations for fossil material (bones, teeth, petrified wood etc) by the ECO on an on-going basis during the construction phase. Significant fossils must be reported to SAHRA for recording and sampling by a professional palaeontologist.

The Visual Impact Assessment shows that approximately 6-10 wind turbines will be visible for the majority of the farm Rietfontein 197. The Heritage Screener conducted for the project noted the presence of a stone walled site (Site 53138) located in the middle of the farm. The site was not rated as highly significant, and therefore the visual impact on the site by the proposed Brandvalley WEF should be negligible.

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It must be reiterated that SAHRA cannot comment on sections of the Brandvalley WEF facility located within the Western Cape Province. Comments must be sought from Heritage Western Cape (HWC) for those sections.

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts the submitted HIA and PIA promotes the respective recommendations included in the reports pertaining to the Northern Cape sections of the proposed development. The following additional conditions must be included in the Environmental Management Programme (EMPr):

- If the layout of the turbines, roads and other associated infrastructure proposed for the Northern Cape section of the development is altered, a heritage walk-down including a palaeontological walk-down must be conducted prior to construction. A Walk-Down report must be submitted to SAHRA for comment. No construction may commence without comments from SAHRA; and
- 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. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required.

Additionally, all outstanding appendices from the Draft EIA must be uploaded to the case file, along with the final EIA and EMPr once completed. SAHRA must be informed if the Environmental Authorisation for the project is granted and the relevant documents should be uploaded to the case file.

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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Page No: 4

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Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
SAHRA Head Archaeologist (Acting)
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/356317>
(DEA, Ref: 14/12/16/3/3/2/900)

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.