



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](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
Tel: 021 462 4502  
Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 9103

Date: Friday September 02, 2016  
Page No: 1

## 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  
Cape Town | Western Cape | South Africa

### **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 revised draft EIA was conducted in terms of the National Environmental Management Act, 1998 (NEMA) and the EIA Regulations, 2014. The proposed 140MW WEF will now consist of 58 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 1 ha on-site concrete batching plant.

It is noted that the amount of turbines located within the Northern Cape section of the proposed development has decreased from nine (9) turbines to six (6) turbines. SAHRA cannot comment on the sections of the proposed project located within the Western 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.

Celeste Booth was appointed to provide heritage input regarding the revised layout for the revised draft EIA.

*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



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Page No: 2

proposed WEF. A cumulative impact assessment conducted on the cultural landscape showed that the cumulative impact of the proposed Brandvalley WEF seen in relation to other proposed/pending WEFs in the area will incur a very high impact without mitigation measures in place. Mitigation measures recommended include the need to effectively rehabilitate the landscape during the decommissioning phase of the development should it occur, therefore reducing the impact medium.

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.

*Booth, 2016. Statement on the Amended Layout for the Proposed 140MW Brandvalley Wind Energy Facility, Matjiesfontein, Northern and Western Cape Provinces, South Africa*

As no heritage resources were identified within the section of the development in the Northern Cape, the reduction of the amount of turbines does not pose a change with regards to impacts on heritage. Additionally, the proposed upgrading of existing internal access roads to a width of 9 m should not increase the impact to heritage resources.

Recommendations provided in the report pertaining to the Northern Cape section of the development include the recommendations provided in the revised AIA (referred to above).

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Page No: 3

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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 Heritage Input for the Revised draft EIA, and promotes the respective recommendations included in the report 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;
- It is noted that Turbine 42 has now been excluded from the proposed revised layout. Previously issued comments noted an indirect impact on palaeontological resources, as Turbine 42 would have been located approximately 100m from plant stem casts or burrows (Loc 194). As this turbine has been removed, the impact should decrease, however careful monitoring of the area near Loc 194 during the construction of the access roads must be conducted by the ECO for any additional plant stem casts or burrows;
- 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.
- 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

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John Gribble  
Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and  
Meteorites Unit  
South African Heritage Resources Agency

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**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.