

Interim Comment

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

Attention: African Clean Energy Developments (Pty) Ltd
P.O. Box 50525
Waterfront
8002

Proposed Establishment of the Hidden Valley Wind Energy Facility and Associated Infrastructure on a Site South of Sutherland, Northern Cape Province (12/12/20/2370)

The SAHRA Archaeology, Palaeontology and Meteorites Unit has reviewed the *Final Environmental Impact Report for the Proposed Hidden Valley Wind Energy Facility (Comprising three development phases) on a site south of Sutherland, Northern Cape Province*, dated April 2014.

SAHRA has re-assessed the information provided in terms of heritage and acknowledges that the conditions stipulated by the archaeologist in Appendix 1 of the EIR are unchanged from the archaeological impact assessment dated February 2012. The opinion of the palaeontologist seems not to have been sought in this regard.

Since our previous comment, dated August 2012, SAHRA has commented on the Phase 1 of the Roggeveld Wind Farm and associated infrastructure. The layout of this wind energy facility includes turbines which are closer than 3km from the R354, both in the Northern Cape and in the Western Cape. However, the impact of these turbines on the sense of place of the R354 was carefully considered and it is expected to be marginal, at least in the Northern Cape, the province for which SAHRA is responsible in terms of archaeology and palaeontology.

It is noted that the final environmental impact assessment report fails to address (see page 413 of the EIR) the request included by the palaeontologist in the desktop study and reiterated by SAHRA in the comment dated 9 May 2012, that a PIA be undertaken before construction at the earliest practical opportunity. It is also noted that two years have passed since SAHRA requested the palaeontological field assessment. It is concerning to SAHRA that, although the avifauna studies have been completed in this time, no palaeontological field assessment has yet been completed and submitted to SAHRA. The Hidden Valley Wind Energy Facility is located on a highly sensitive area in terms of palaeontology and the likelihood of the proposed development impacting on significant palaeontological material is therefore great. The positioning of wind turbines may well be impacted by the findings of the palaeontological field assessment.



Case Comment:

SAHRA recommends that:

- Turbines 197, 200, 201 and 202 be removed in order to protect the sense of place experienced along the R354. SAHRA acknowledges that the latest layout at page 186 of the EIR makes provision for the removal of these four turbines.
- If any further turbine should be located within 3kms from the R354, the impact on the sense of place of this road must be assessed separately.
- Ancillary infrastructure should be no closer than 500m to the R354.
- A palaeontological impact assessment inclusive of a field survey **must** be undertaken at the earliest opportunity, preferably before the submission of the final EIR to DEA as it is likely that the findings of this study may impact on turbine placement. This palaeontological field assessment must identify specific outcrops of palaeontological sensitivity and provide appropriate management strategies for the conservation of this significant heritage. This report must be submitted to SAHRA for comments.
- Alternative access roads must be identified and be located at least 30m from any sensitive heritage features, such as graveyards. An archaeologist will need to survey the routes of the new access roads.
- The graves should be restored where these are dilapidated, protected and conserved. For this purpose, a proper fence must be built around the unfenced graveyards, with entry gates to allow visits from relatives and friends. The fence must be placed 5 meters away from the perimeter of the graves. No development is allowed within 30 meters of the fence line surrounding the graves.
- Once the final layout of turbines, substations, powerlines and access roads has been decided, the archaeologist must be informed and, if necessary, another field survey may be conducted. The archaeological report must be submitted to SAHRA for further comments.
- Decisions on Built Environment (structures older than 60 years, including all farm infrastructure) must be made by the Provincial Heritage Resources Authority of the Northern Cape (Mr Andrew Timothy: ratha.timothy@gmail.com).

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully



Hidden Valley Wind Farm

Our Ref: 9/2/091/0004

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CaseID: 218

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an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency

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SAHRA Head Archaeologist
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/44937>
(DEA, Ref: 12/12/20/2370)

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.



The South African Heritage Resources Agency

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