



18 May 2022

Ms Natasha Higgitt
SAHRA
nhiggitt@sahra.org.za

Dear Ms Higgitt,

**RE CASE 4377
HERITAGE WALKDOWN REPORT FOR THE APPROVED CASTLE WIND ENERGY FACILITY AND
ASSOCIATED INFRASTRUCTURE NEAR DE AAR IN THE NORTHERN CAPE**

IN REFERENCE TO LATEST INTERIM COMMENT DATED 13 MAY 2022

Many thanks for your Interim Comment issued for this project dated 13/05/2022. You state in your comment that “SAHRA issued a Final Comment for the development on the 14/07/2015 where SAHRA did not object to the development and provided conditions (<https://sahris.sahra.org.za/node/314997>), including the need for a walkdown of the final layout by an archaeologist and palaeontologist.”

You conclude the Interim Comment by noting that “As per the Final Comment issued by SAHRA on the 14/07/2015 and reiterated in Final Comments issued on the 06/08/2019 and 16/10/2019, the walkdown was to be completed by an archaeologist and palaeontologist. No palaeontological walkdown report has been submitted. SAHRA therefore requests that a walkdown and report be conducted by a qualified palaeontologist before further comments can be issued.”

In March 2022, CTS Heritage completed a Heritage Walkdown for the approved Castle Wind Energy Facility. This was required as part of condition 19 of the Environmental Authorisation for the project as outlined in Section 1.1 of the report.

Initial EA was granted for the Castle WEF on 8 May 2015. With regard to heritage management, in terms of this EA:

*19. The holder of this authorisation must appoint qualified vegetation, fauna, **heritage** and avifauna specialists to ground-truth every infrastructure footprint and their recommendation must inform the final layout of the facility and the EMP to be submitted to the department for approval.*

In SAHRA’s comments on the authorised Castle WEF (14/07/2015), SAHRA had “no objections to the proposed project if the following recommendations are to be implemented:

1. The power line options should be subject to a walk-through by an archaeologist and a palaeontologist once these have been decided.” This comment was reiterated in Final Comments issued on the 06/08/2019 and 16/10/2019 issued by SAHRA, that the walkdown of the **power line options** was to be completed by an archaeologist and palaeontologist.

As such, it is our contention that the submitted walkdown assessment satisfies the requirements of SAHRA and Condition 19 of the Environmental Authorisation as it pertains to the authorised Castle WEF.



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In terms of the walkdown by a palaeontologist required by SAHRA for the power line options, a number of subsequent changes have taken place with regard to the power line corridor to be used for the Castle WEF project.

A Basic Assessment Process is underway in an effort to amend the layout of the authorised powerline for the Castle WEF from the line indicated in our Walkdown Assessment. It is anticipated that this BA will be submitted to SAHRA on 26 May 2022 (SAHRIS Case ID 18637). The Desktop Heritage Screening Assessment for this proposed amendment is already created on SAHRIS (Report NID 597705).

The proposed amended alignment has been thoroughly assessed for impacts to both archaeology and palaeontology as part of a separate project process (Case ID 15647) to develop a 400kV Transmission Line for De Aar 2. The HIA completed for this project covers the proposed amended Castle WEF to Hydra power line route in its entirety as it follows exactly the same route and distance. This HIA was completed by Gribble and Euston-Browne (Report NID 570440) with a palaeontological field assessment completed by Bamford (2021) integrated into the report. This HIA was approved by SAHRA in a Final Comment issued by SAHRA on 30/04/2022.

The findings of Gribble and Euston-Browne (2021) as they pertain to the proposed amended Castle WEF to Hydra OHL are detailed in the completed Desktop Heritage Screening Assessment and it is recommended that the recommendations detailed in the completed HIA also apply to the proposed Castle WEF to Hydra grid connection.

In summary;

- A palaeontological walkdown was only required for the power line options in terms of SAHRA's requirements
- The power line to be used by the Castle WEF is undergoing an amendment process (BA) to be submitted to SAHRA on 26 May 2022 (Case ID 18637)
- The amended powerline route has been subject to a full archaeology and palaeontology field assessment by Gribble and Euston-Browne (2021) and Bamford (2021)
- The recommendations from Gribble and Euston-Browne (2021) and Bamford (2021) must also apply to the Castle WEF to Hydra OHL. This can be communicated in SAHRA's response to this application once made.

As such, in light of this information, we kindly request that the Interim Comment issued on 13/05/2022 in response to the Walkdown Report is reconsidered and that the request for a palaeontological walkdown is lifted given that it was not required by SAHRA for the Castle WEF layout and a full palaeontological walkdown of the OHL route by Bamford has been completed.

Yours faithfully,

Jenna Lavin
CTS Heritage