



PGS HERITAGE

HAMLETT WIND FARM, BETWEEN MAKHANDA AND SOMERSET EAST, EASTERN CAPE

Heritage Impact Assessment

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+ 27 (0) 12 332 5305



+27 (0) 86 675 8077



contact@pgsheritage.co.za



PO Box 32542, Totiusdal, 0134

Offices in South Africa, Kingdom of Lesotho and Mozambique

Head Office:
906 Bergarend Streets
Waverley, Pretoria,
South Africa

Directors: HS Steyn, PD Birkholtz, W Fourie

Declaration of Independence

I, Cherene de Bruyn, declare that –

General declaration:

- I act as the independent heritage practitioner in this application
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting heritage impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will take into account, to the extent possible, the matters listed in section 38 of the NHRA when preparing the application and any report relating to the application;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing - any decision to be taken with respect to the application by the competent authority; and - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not
- All the particulars furnished by me in this form are true and correct;
- I will perform all other obligations as expected from a heritage practitioner in terms of the Act and the constitutions of my affiliated professional bodies; and
- I realise that a false declaration is an offence in terms of regulation 71 of the Regulations and is punishable in terms of section 24F of the NEMA.

Disclosure of Vested Interest



- I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations;

HERITAGE CONSULTANT: PGS Heritage (Pty) Ltd
CONTACT PERSON: Cherene de Bruyn – Archaeologist
Tel: +27 (0) 12 332 5305
Email: cherene@pgsheritage.co.za

SIGNATURE:



ACKNOWLEDGEMENT OF RECEIPT

Report Title	HAMLETT WIND FARM, BETWEEN MAKHANDA AND SOMERSET EAST, EASTERN CAPE		
Control	Name	Signature	Designation
Author	Cherene de Bruyn		Archaeologist/ PGS Heritage
Internal review	Wouter Fourie		Principal Heritage Specialist
Reviewed	Lisa Opperman		Environmental Consultant

CLIENT: Savannah Environmental (Pty) Ltd

CONTACT PERSON: Jo-Anne Thomas
Tel: +27 (0)11 656 3237
E-mail: joanne@savannahsa.com

SIGNATURE: _____

EXECUTIVE SUMMARY

PGS Heritage (Pty) Ltd (PGS) was appointed by Savannah Environmental (Pty) Ltd (Savannah) to undertake a Heritage Impact Assessment (HIA) and Palaeontological Impact Assessment (PIA) which will serve to inform the Basic Assessment Report (BAR) and Environmental Management Programme (EMPr) for the proposed Hamlett Wind Farm, between Makhanda and Somerset East, Eastern Cape.

The proposed development forms part of a cluster of renewable energy development that will include several wind energy facilities as well as solar photovoltaic (PV) facilities. The location of the wind and solar energy facilities and grid connection infrastructure is within the Cookhouse Renewable Energy Development Zone (REDZ) and the Eastern Corridor of the Strategic Transmission Corridors. The site is split into two definitive areas, namely:

- Eastern development area situated close to Makhanda with access from the Nquara Harbour being along the N2 to Grahamstown, along the R335 to Bedford and the wind farm site.
- The Western Priority development area situated immediately to the west of the N10 up to Somerset East.

This HIA aims to evaluate the possible impacts on heritage resources present within the proposed development footprint of the Hamlett Wind Farm.

A team of heritage specialist developed an integrated HIA to evaluate the possible immediate and direct impacts on heritage resources present within the footprint and adjacent area for cumulative impacts. Immediate and direct impacts on archaeological and palaeontological resources were addressed through the HIA and a Palaeontological Impact Assessment (PIA) (**Appendix C**).

Site Name and Location

Hamlett (Pty) Ltd is proposing the development of a commercial wind farm and associated infrastructure on a site located approximately 27km south-east of Somerset East and 20km south-west of Cookhouse (measured from the centre of the site) within the Blue Crane Route Local Municipality and the Sarah Baartman District Municipality in the Eastern Cape Province.

The project site comprises the following twelve (12) farm portions:

- Farm Vaalkop No 164
- Remainder of Portion 1 (Middlevale) of Farm Van Aardts Kraal No 163
- Portion 1 of Farm Jaskraal No 160
- Remainder of Farm Riet Fontein A No 159

- Portion 1 of Farm Riet Fontein A No 159
- Remainder of Farm Jaskraal No 160
- Remainder of Farm Nieuwe Grond A No 129
- Remainder of Farm Wilton No 409
- Portion 2 of Farm Middleton No 219
- Remainder of Farm Bloemhof No 166
- Farm Wilde Honden Kloof No 216
- Portion 1 of the Farm Bloemhof 166

A preferred project site with an extent of ~14 329ha has been identified by Hamlett (Pty) Ltd as a technically suitable area for the development of the Hamlett Wind Farm with a contracted capacity of up to 333MW that can accommodate up to 37 turbines.

It should be noted that the proposed Hamlet Wind Farm is situated in the Cookhouse Renewable Energy Development Zone (REDZ). The REDZ was proclaimed in February 2018 (published under Government Notice No. 114 in Government Gazette No. 41445 of 16 February 2018; and Government Gazette 43528, Notice 786 for consultation with the intention to identify three additional REDZ to the eight REDZ) and allows for the completion of a BA in the case of large-scale wind and solar developments situated within the REDZ.

Fieldwork

The fieldwork component of the study was aimed at identifying tangible remains of archaeological, historical and heritage significance. The fieldwork was undertaken by way of intensive walkthroughs of the study area. The fieldwork was conducted over several days on 23 March 2020 as well as from 8 to 13 June 2020. This fieldwork team consisted of an archaeologist (Cherene de Bruyn) and a field assistant (Pascal Snyman).

Heritage Resources Identified

The following provides a breakdown of the heritage resources identified and graded in the study area. During the survey, fourteen (14) heritage sites were identified. Of these 14 sites, ten (10) sites (**WWF1-01 to WWF1-10**) consist of structures (Farmhouses, Labourer houses, farm sheds and kraals), and four (4) sites contain graves (**WWF1-11 to WWF1-14**).

Historical Structures

Two stone kraals (**WWF1-03, WWF1-04**), a labourer house (**WWF1-09**) and a contemporary shed and kraal (**WWF1-10**) were deemed NCW and is not of research potential or other cultural significance.

Four stone labourer houses (**WWF1-01, WWF1-02, WWF1-06, WWF1-07**), and two farmsteads (**WWF1-05 and WWF1-08**) have low heritage significance and low heritage sensitivity.

Burial Grounds and graves

Four (4) burial grounds (**WWF1-11 to WWF1-14**) were identified that may be affected by the proposed project. Graves have a high heritage significance and heritage rating of IIIA.

Palaeontology

According to the PIA conducted by Banzai Environmental (Butler, 2021) the proposed development is underlain by the Dwyka Group, Collingham Formation, Whitehill Formation, Prince Albert Formation, Rippon Formation, Fort Brown Formation (Ecca Group, Karoo Supergroup), Koonap Formation, Middleton Formation and Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup), and Dolerite

According to the PalaeoMap of SAHRIS the Palaeontological Sensitivity of the Dwyka Group is Low, the Collingham Formation, Rippon Formation, Fort Brown Formation of the Ecca Group is Moderate, while the Prince Albert Formation has a High and the Whitehill Formation of the Ecca has a Very High Palaeontological Sensitivity. The Adelaide Subgroup has a Very high Palaeontological Sensitivity while Dolerite is igneous in origin and thus has an Insignificant Paleontological Sensitivity (Almond et al, 2013; SAHRIS website). A 3-day site-specific field survey of the development footprint was conducted on foot and by a motor vehicle on 20 November to 23 November 2020. No visible evidence of fossiliferous outcrops was found.

Cultural Landscape

The proposed Hamlet Wind Farm is located in an area that is sparsely populated (less than 10 people per km²) and consists of a landscape of wide-open spaces and very little development. The largest concentrations of people are located at Somerset East, Cookhouse, Bedford and Alicedale, the main towns within the region. The Hamlet WEF is located in a rural area, currently zoned as agriculture, at a distance of approximately 27km south-east of Somerset East (du Plessis, 2021). Besides the limited cultivation of crops, the study area is largely in a natural state, with mainly sheep and game farming as additional economic activities (du Plessis, 2021). Farm residences, or homesteads, dot the landscape at an irregular interval. The vegetation cover in the region is primarily grassland and low shrubland, with some forest and woodland occurring along the banks of the Little Fish and Great Fish Rivers. The proposed development envelope spans across strongly undulating plains and hills and tall hills at an average elevation of 667m above sea level (du Plessis, 2021).

The region between and surrounding Makhanda (previously known as Grahamstown) and Somerset East is sparsely populated with several farmsteads and their associated structures located on the valley floors of this hilly and mountainous region.

The farmsteads are connected through several farm roads and old historic ox-wagon routes that link the local communities to the busy towns of Makhanda and Somerset East.

The area proposed for the Hamlett Wind Farm has a low to high heritage significance. Many of the old farm buildings and stone houses in the area contain architectural elements greater than 60 years of age and fall with the general protection of the National Heritage Resources Act (25 of 1999) (NHRA). This significance of the area comprises both Local and Provincial heritage sites, consisting of palaeontological sites, rock art, burial grounds and graves, monuments and memorials, stonewalling, as well as historical structures. **The significance grading of the landscape elements ranged from IIIC to I. Sufficient mitigation measures were proposed.**

Impact Statement

Analysis of the various components of the HIA indicates a mitigated medium to a low negative impact on heritage resources and are expanded on below.

Historical structures

An assessment of the possible impacts of the proposed project on historical heritage resources has shown that unmitigated impacts vary between low to medium negative impacts mostly confined to the construction phase of the project. **By implementing the mitigation measures as listed in this report these impacts can be managed to low negative.**

Burial Grounds and graves

An assessment of the possible impacts of the proposed project on graves and burial grounds has shown that unmitigated impacts consist of a high negative impact mostly confined to the construction phase of the project. **By implementing the mitigation measures as listed in this report these impacts can be managed to low negative.**

Palaeontology

An assessment of the possible impacts of the proposed project on Palaeontological resources has shown that unmitigated impacts consist of a medium negative impact mostly confined to the construction phase of the project. **By implementing the mitigation measures as listed in this report these impacts can be managed to low negative.**

Cultural landscape

An assessment of the possible impacts of the proposed project on the overall cultural landscape has shown that unmitigated impacts consist of a high negative impact mostly confined to the construction and operation phase of the project. **By implementing the mitigation measures as listed in this report these impacts can be managed to high negative.**

Cumulative Impacts

Considering the development of other WEF located next to the Wind Garden Wind Farm and within the broader Grahamstown (Makanda region) the cumulative unmitigated impacts on Historical structures, Burial ground and graves as well as palaeontological resources consist of a medium negative impact mostly confined to the construction phase of the project. This could potentially result in an unacceptable loss of heritage resources. **However, by implementing the mitigation measures as listed in this report the cumulative impacts can be managed to low negative.**

Recommendations

The following mitigation measures are listed in Table 1.

Table 1 - Heritage management recommendations.

Area and site no.	Mitigation measures
General project area	<ul style="list-style-type: none">• Implement a chance to find procedures in case possible heritage finds are uncovered.• A detailed “walk down” of the final approved turbine locations, access roads, powerlines and substations will be required before construction commences.• Any heritage features of significance identified during this walk down will require formal mitigation (i.e. permitting where required) or where possible a slight change in design could accommodate such resources.• A Heritage management plan (HMP) for the heritage resources needs to be compiled and approved for implementation during construction and operations where heritage features of significance are identified.
Historical Structures that were rated as NCW (WWF1-03, WWF1-04, WWF1-09 and WWF1-10)	<ul style="list-style-type: none">• No mitigation is required
Historical Structures (WWF1-01, WWF1-02, and WWF1-05 to WWF1-06) that were rated as low heritage significance and heritage rating of IIIC.	<ul style="list-style-type: none">• In terms of general conservation of the historical farmsteads, a 500m no-go-buffer-zone is recommended. However, considering the impact of the proposed development of the Hamlett WEF on the cultural landscape of these historical farmsteads, a 1000m no-go-buffer-zone (inclusive of the 500m no-go-buffer-zone) should be implemented.

Area and site no.	Mitigation measures
	<ul style="list-style-type: none"> • If development occurs within 1000m the main homesteads/ “werf” need to be satisfactorily studied and recorded before impact occurs. • Recording of the buildings i.e. (a) map indicating the position and footprint of all the buildings and structures (b) photographic recording of all the buildings and structures (c) measured drawings of the floor plans of the principal buildings.
Graves and Burial grounds (EWF2-05)	<ul style="list-style-type: none"> • The site should be demarcated with a 30-meter no-go-buffer zone and that the graves should be avoided and left in situ. • A Grave Management Plan should be developed for the graves, to be implemented during the construction and operation phases (which needs approval by ECPRA). • If the site is going to be impacted and the graves need to be removed a grave relocation process for site is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with the SAHRA under the NHRA and National Health Act regulations.
Possible graves (if discovered / uncovered)	<ul style="list-style-type: none"> • When graves are discovered/uncovered the site should be demarcated with a 30-meter no-go-buffer-zone and the grave should be avoided. • Undertake archaeological monitoring at earth clearance stage. • If human remains are discovered a grave relocation process is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with the ECPHRA under the NHRA and National Health Act regulations. • If during the test excavations it is determined that the feature is not a grave, the site will then have no heritage significance and require no further mitigation.
Palaeontological finds	<ul style="list-style-type: none"> • If fossil remains are discovered during any phase of construction, either on the surface or exposed by fresh excavations the Chance Find Protocol must be implemented by the EO in charge of these developments. • Fossil discoveries ought to be protected and the EO/site manager must report to SAHRA
Cultural Landscape	<ul style="list-style-type: none"> • Mitigation measures as proposed in the HIA for the proposed Hamlett Wind Farm development that reduces negative impacts on the land use patterns and living heritage will reduce the impact of this facility on the overall load. • The mitigation measures proposed for heritage resources will reduce the negative cumulative impact on the cultural landscape and should be implemented as recommended. <p>According to the Visual impact assessment (VIA) of LOGIS by Du Plessis (2021) no mitigation of the impact on the sense of place of the region or the cultural landscape is possible as</p>

Area and site no.	Mitigation measures
	<p>the structures will be visible regardless. However, the following general mitigation measures are proposed:</p> <ul style="list-style-type: none"> • The natural vegetation in all areas outside of the development footprint/servitude must be maintained/re-established during the planning phase. • Maintain the general appearance of the facility as a whole during the operational phase • Remove the infrastructure not required for the post-decommissioning use and rehabilitate all areas. <p>General mitigation measures for renewable energy development in areas of cultural landscape significance as proposed by Jansen and Franklin, (2021) as well as Lavin (2021) is recommended:</p> <p>Ecological:</p> <ul style="list-style-type: none"> • Species and ecosystem loss should be prevented by limiting fragmentation in the landscape, and should therefore adhere to the following general recommendations: <ul style="list-style-type: none"> • Remaining areas of endemic and endangered natural vegetation should be conserved. • High and Very High Sensitivity Ecological areas (crest lines and drainage lines), should be protected from development. • Areas of habitat are found among the rocky outcrops and contribute to the character, as well as biodiversity of the area. Care should be taken that habitats are not needlessly destroyed. • Careful planning should incorporate areas for stormwater runoff where the base of the structure disturbed the natural soil. Local rocks found on the site could be used to slow stormwater (instead of concrete, or standard edge treatments), and prevent erosion that would be an unfortunate consequence that would alter the character of the site. By using rocks from site, it helps to sensitively keep to the character. • The principle of 'tread lightly' must be applied for any activity (and associated development requirements e.g. toilets for the construction process) should be emphasised. <p>Aesthetic:</p> <ul style="list-style-type: none"> • Encourage mitigation measures (for instance use of vegetation) to 'embed' or disguise the proposed structures within the surrounding tourism and agricultural landscape at ground level, road edges etc; • The continuation of the traditional use of material could be enhanced with the use of the rocks on the site as building material. This would also help to embed structures into the landscape that does not have to be standard containers that clutter the landscape.

Area and site no.	Mitigation measures
	<ul style="list-style-type: none"> • Using material found on the site adds to the sense of place and reduces transportation costs of bringing materials to site. • Where additional infrastructure (i.e. roads) is needed, the upgrade of existing roads to accommodate the development should be the first consideration. The local material such as the rocks found within the area could be applied to address stormwater runoff from the road to prevent erosion. • Infrastructure improvement, including new roads and upgrades to the road network, should be appropriate to the rural context (scale, material etc.). • The layout of the turbines should have an emphasis on place-making, i.e. landscape-related heritage considerations, as opposed to standard infrastructure driven requirements; • Prevent the construction of new buildings/structures on visually sensitive, steep, elevated or exposed slopes, ridgelines and hillcrests. Retain the integrity of the distinctive landscape character; • Scale and massing should be sensitive to the surrounding landscape, although this is challenging with regard to the development of WEFs. • Avoid visual clutter in the landscape by intrusive signage, and the intrusion of commercial corporate development along roads • Avoid development of infrastructure (such as buildings, wind turbines and power lines), on crests or ridgelines due to the impact on the visual sensitivity of skylines. • Retain view-lines and vistas focused on prominent natural features such as mountain peaks or hills, as these are important place-making and orientating elements for experiencing the cultural landscape. <p>Historic:</p> <ul style="list-style-type: none"> • The integrity of the historic farm werfs should be maintained and protected. • Names of routes and watercourses that refer to traditional use during the time of the hunter-gatherers and herders, as well as the colonial era, should be celebrated. • Traditional planting patterns should be protected by ensuring that existing trees are not needlessly destroyed, as these signify traces of cultural intervention in a harsh environment. These planting patterns include the trees planted around the werfs. • In some cases, remnant planting patterns (even single trees) uphold the historic character of an area. Interpretation of these landscape features as historic remnants should occur. • Mountain slopes have been used for traditional practices for many years, and care should be taken that any significant cultural sites, such as burials and veldkos/medicinal plant resources, are not disturbed.

Area and site no.	Mitigation measures
	<ul style="list-style-type: none"> • Where the historic function of a building/site is still intact, the function has heritage value and should be protected. Please take note of the items listed below: • Surviving examples (wagon routes, outspans, and commonage), where they are owned in some public or communal way (or by a body responsible for acting in the public interest) and where they are found to be actively operating in a communal way, will have cultural and heritage value and should be enhanced and retained. • The new roads should display minimum scale designs where possible. • Maintain traditional movement patterns across rural landscapes or to places of socio-historical value. (a) Avoid privatization or the creation of barriers to traditional access routes. (b) Retain old roadways, which have been replaced by newer roads, for use as recreation trails. • Respect existing patterns, typologies and traditions of settlement-making by promoting the continuity of heritage features. These include: (a) indigenous; (b) colonial; and (c) current living heritage in the form of tangible and intangible associations to place. • Respect traditional werf settlement patterns by considering the entire werf as the component of significance. This includes the backdrop of the natural landscape against which it is sited, as well as its spatial structure. Any development that impacts the inherent character of the werf component should be discouraged. <p>Social:</p> <ul style="list-style-type: none"> • Care should be taken that existing functions such as outspan areas (see criteria for these under historic) are not lost in the development stages, as it fulfils an important function within the cultural landscape. • The local community around the development should benefit from job opportunities created by the proposed development. <p>Economic:</p> <ul style="list-style-type: none"> • Sheep or game farming should be allowed to continue below the wind turbines, alternatively, the areas below the turbines should be rehabilitated to increase biodiversity in the area. • Care should be taken to reduce visual impact from surrounding tourism areas, by following the recommendations included in the Visual Impact Assessment.

Findings

The assessment of the possible impacts on the archaeological, historical and palaeontological resources has shown a Low impact from the WEF project after mitigation measures. It is further considered that the project can have a potential positive influence on such resources in the

region when the proposed conservation initiative from the project considers such resources as part of a larger development strategy.

The assessment of the Cultural Landscape (CL) indicated that the project will have a significant Moderate to High impact on the CL. The general mitigation measures for renewable energy development in areas of cultural landscape significance as proposed by Jansen and Franklin, (2021) as well as Lavin (2021) will still result in a marginal reduction of impact. However, the size and bulk of the turbines in the landscape will unlikely be totally mitigatable.

It must further be considered that the addition of the infrastructure of the WEF will constitute an additional layer to the cultural landscape and must be considered as such within a gazetted REDZ area. Through the implementation of the economically feasible recommendations as set out in the CLA and contained in this report it will be possible to preserve older layers of the cultural landscape and in some cases even enhance them through consideration such as the use of older name places in the naming of infrastructure and enhancing local heritage through the incorporation of such structures in project conservation initiatives to name a few.

Analysis of the findings of the SEIA for this project further reveals that the economic benefit for the region and the overall energy needs such project addresses outweighs the need for conservation of cultural resources at all costs. The economic benefit for the region and the overall energy needs such a project address outweigh the need for the exclusion of the WEF to conserve cultural resources at all costs. Especially where a project is situated within a gazetted REDZ area.

The overall impact of the Hamlet Wind Farm, on the heritage resources identified during this report, is considered as acceptable after the recommendations have been implemented and therefore, impacts can be mitigated to acceptable levels allowing for the development to be authorised.

Cherene de Bruyn –Author (Heritage Impact Assessment)

- Accredited Professional Archaeologist (ASAPA)

Wouter Fourie – Co-Author (Heritage Impact Assessment)

- Accredited Professional Heritage Practitioner (APHP)
- Accredited Professional Archaeologist (ASAPA)

Dr Elize Butler – Palaeontological Specialist –Bamzai

- Member of the Palaeontological Society of South Africa (PSSA)

Refer to Appendix B for CVs specialist

TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	Scope of the Study	1
1.2	Specialist Qualifications	1
1.3	Assumptions and Limitations	2
1.4	Identification of Policies, Legislation, Standards & Guidelines	2
1.4.1	<i>Statutory Framework: The National Heritage Resources (Act 25 of 1999)</i>	2
1.4.2	<i>Section 3 - National estate</i>	2
1.4.3	<i>Section 34 – Structures</i>	3
1.4.4	<i>Section 35 – Archaeology, Palaeontology and Meteorites</i>	3
1.4.5	<i>Section 36 – Burial Grounds & Graves</i>	3
1.4.6	<i>Section 38 HIA as a Specialist Study within the EIA in terms of Section 38(8)</i>	4
1.4.7	<i>World Heritage Convention</i>	5
1.4.8	<i>Renewable Energy Development Zone</i>	5
1.4.9	<i>Notice 648 of the Government Gazette 45421</i>	5
1.4.10	<i>NEMA – Appendix 6 requirements</i>	8
2	SITE LOCATION AND DESCRIPTION	10
2.1	Locality and Site Description	10
2.2	Technical Project Description	12
2.2.1	<i>Consideration of Alternatives:</i>	12
3	CURRENT STATUS QUO	14
3.1	Site Description	14
4	ASSESSMENT METHODOLOGY	19
4.1	Archaeological specific methodology	19
4.2	Palaeontological specific methodologies	19
4.3	Cultural Landscape Assessment	20
4.3.1	<i>Desktop analysis (including using satellite imagery) and literature review.</i>	20
4.3.2	<i>Community engagement</i>	20
5	HISTORICAL OVERVIEW OF THE STUDY AREA	21
5.1	Overview of Study Area and Surrounding Landscape	21
5.2	Historical Background of Grahamstown Area	24
5.2.1	<i>Grahamstown (now known as Makhanda)</i>	24
5.2.1	<i>Riebeek East</i>	26
5.2.2	<i>Cookhouse</i>	27
5.2.3	<i>Somerset East</i>	27
5.3	Archival/historical maps	27
5.1	Palaeontological background	38

5.1.1. <i>Dwyka Group</i>	38
5.1.2. <i>Cape Supergroup</i>	Error! Bookmark not defined.
5.2. Cultural and Living Heritage Background	42
5.2.1. Archaeological Resources	42
5.2.2. Historical Resources	42
5.2 Previous Archaeological and Heritage Studies in and around the Study Area	43
5.3 Findings of the historical desktop study	45
5.3.1 <i>Heritage Sensitivity</i>	45
6 FIELDWORK AND FINDINGS	47
78	
6.1 Sensitivity assessment outcome	83
7 PALAEOLOGY	84
8 CULTURAL LANDSCAPE	88
8.1 Cultural landscapes	88
8.1.1 <i>Cultural landscapes in a REDZ Zone</i>	88
8.2 The Hamlett Cultural Landscape	89
8.2.1 <i>Hamlet – Land Use</i>	89
8.2.2 <i>Vegetation</i>	90
8.2.3 <i>Mountainous ridges</i>	90
8.2.4 <i>Riverine corridors</i>	90
8.2.5 <i>Historic farmsteads</i>	94
8.2.6 <i>Burial Grounds and Graves</i>	94
8.2.7 <i>Historic routes and gateways</i>	94
8.2.8 <i>Conservation areas</i>	97
9 SOCIO-ECONOMIC PROJECT INITIATIVE	98
9.1 Economic Impact of SED Spend	98
9.2 Community Enrichment Initiative Spending	99
10 IMPACT ASSESSMENT	100
10.1 Assessment of Cumulative Impacts	101
10.2 Heritage Impacts	102
10.2.1 <i>Historical structures</i>	103
10.2.2 <i>Burial Grounds and graves</i>	104
10.2.3 <i>Palaeontological Impacts</i>	105
Chance Find Procedure	106
10.2.4 <i>Impact on Cultural Landscape elements</i>	106
10.3 Cumulative Impacts	109
10.4 Consideration of the socio-economic benefit relative to heritage resources	112
10.5 Management recommendations and guidelines	114

10.5.1	<i>Construction phase</i>	114
10.5.2	<i>Grave Management Plan guidelines</i>	115
10.5.3	<i>Chance find procedure</i>	115
10.5.4	<i>Possible finds during construction and operation (mining activities)</i>	116
10.6	Timeframes	116
10.7	Heritage Management Plan for EMPr implementation	117
11	CONCLUSIONS	121
11.1	Heritage Sites	121
11.1.1	<i>Historical structures</i>	121
11.1.2	<i>Burial Grounds and graves</i>	121
11.1.3	<i>Palaeontological Impacts</i>	121
11.1.4	<i>Cultural Landscape</i>	122
11.2	Impact Statement	122
11.2.1	<i>Historical structures</i>	123
11.2.2	<i>Burial Grounds and graves</i>	123
11.2.3	<i>Palaeontology</i>	123
11.2.4	<i>Cultural landscape</i>	123
11.2.5	<i>Cumulative Impacts</i>	123
11.3	Recommendations	123
11.4	Findings	128
12	REFERENCES	129

List of Figures

<i>Figure 1 – Human and Cultural Timeline in Africa (Morris, 2008)</i>	<i>xxvi</i>
<i>Figure 2 - Environmental screening tool - archaeological and heritage sensitivity that includes the Hamlett Wind Farm project area.....</i>	<i>7</i>
<i>Figure 3 - Environmental screening tool - palaeontology sensitivity that includes the Hamlett Wind Farm project area.</i>	<i>8</i>
<i>Figure 4 - Locality map of the Hamlett Wind Farm illustrating the proposed development footprint (i.e. proposed infrastructure) within a regional context.</i>	<i>11</i>
<i>Figure 5 – Hamlett Wind Farm Site Development Plan (Provided by WindRelic).....</i>	<i>13</i>
<i>Figure 6 – Access to the site from the N10</i>	<i>15</i>
<i>Figure 7 – View of the farm Bloemhof 166</i>	<i>15</i>
<i>Figure 8 – General view of the farm Jaskraal 160.....</i>	<i>16</i>
<i>Figure 9 – General view of the farm Wildenhonden Kloof 216.....</i>	<i>16</i>
<i>Figure 10 - General view of the farm Rietfontein 159.....</i>	<i>17</i>
<i>Figure 11 -General view of the farm Middelton 219</i>	<i>17</i>
<i>Figure 12 - General view of the farm Wilton 409.....</i>	<i>18</i>
<i>Figure 13 - Map showing District of Albany in the Colony of Good Hope, and the location of the old roads, and the approach to Grahamstown through the farm "Zyfer Fontein" and "Mr Goodwins (Red Arrow) (Source: Campbell, 1897). The study area is located to the north-west of Grahamstown and not depicted on the map.</i>	<i>25</i>
<i>Figure 14 - Map showing of the Eastern Frontier in 1860 (Source: Militaryhistorysa, 2017) ..</i>	<i>26</i>
<i>Figure 15 –Topographic map Grahamstown dating to 1901 showing the several farms, in the project area (blue polygons).</i>	<i>29</i>
<i>Figure 16 – First Edition Topographic map (1:50 000) 3225DC Niekerkberg dating to 1956 and First Edition Topographic map (1:50 000) 3225DD Golden Valley dating to 1950 showing the Hamlett Wind Farm with several heritage features (red polygons) located in close proximity to the project development area (blue polygon).</i>	<i>30</i>
<i>Figure 17 –Second Edition Topographic map (1:50 000) 3225DC Niekerkberg dating to 1979, and Second Edition Topographic map (1:50 000) 3225DD Golden Valley dating to 1979 showing Hamlett Wind Farm with several heritage features (orange polygons) located in close proximity to the project development area (blue polygon).</i>	<i>31</i>
<i>Figure 18 – SG-Diagram of the Farm Bloemhof 166 surveyed by the Government Surveyor Theo. W. Bell in August 1904.</i>	<i>33</i>
<i>Figure 19 – SG-Diagram from the Chief Surveyor-General database for Farm Nieuwe Grond 129 surveyed by the Government Land Surveyor Alfred Webster in February 1888</i>	<i>34</i>
<i>Figure 20 – SG-Diagram from the Chief Surveyor-General database for Farm Nieuwe Grond 129, Portion 1 surveyed by the Land Surveyor Kim. C. Lomborg in June 1936</i>	<i>35</i>
<i>Figure 21 – SG-Diagram from the Chief Surveyor-General database for Farm Wilton 409 surveyed in November 1988.....</i>	<i>36</i>

Figure 22 – Heritage sensitivity map indicating possible sensitive areas around and within Hamlett Wind Farm project area.....	37
Figure 23 - Extract of the 1:250 000 3326 Grahamstown Geological Map (Council of Geosciences [Pretoria]) indicating the Eastern Block (Wind Garden) Wind Farms (butler, 2021).	42
Figure 24 – Locality of the heritage resource in the study area	48
Figure 25 - View of the labourer house (WWF1-01a) found at site WWF1-01.	50
Figure 26 - View of the kraal found near the house (WWF1-01b).....	50
Figure 27 - Second stone labourer house (WWF1-01c). The scale is in 10cm increments....	51
Figure 28 - Third stone labourer house (WWF1-01d). The scale is in 10cm increments.....	51
Figure 29 - Second cattle kraal (WWF1-01e). The scale is in 10cm increments.	51
Figure 30 - View of the stone house. The scale is in 10cm increments.	54
Figure 31 - View of the collapsed wall of the house. The scale is in 10cm increments.	54
Figure 32 - View of the stone cattle kraal. The scale is in 10cm increments.	54
Figure 33 - The collapsed wall of the stone cattle kraal at site WWF1-03. The scale is in 10cm increments.	55
Figure 34 - The collapsed wall of the stone cattle kraal at site WWF1-04. The scale is in 10cm increments.	56
Figure 35 - View of the Western Facade of the Main Farmhouse. The scale is in 10cm increments	58
Figure 36 - View of the Northern Façade. The scale is in 10cm increments	58
Figure 37 - Inside of the house, where most of the floor has been damaged. The scale is in 10cm increments	59
Figure 38 - Shed found next to the house. The scale is in 10cm increments	59
Figure 39 - The second farmhouse found at site WWF1-05. The scale is in 10cm increments	60
Figure 40 - Stonepacked wall connecting the main house with the second house. The scale is in 10cm increments.	60
Figure 41 - Stone labourer house (WWF1-06a). The scale is in 10cm increments.	63
Figure 42 - Second stone labourer house (WWF1-06b). The scale is in 10cm increments....	63
Figure 43 - Upper grinding stone found at site WWF1-06. The scale is in 10cm increments.	64
Figure 44 - Labourers house found at site WWF1-07. The scale is in 10cm increments.	65
Figure 45 - View of the main Farmhouse (WWF1-08a). The scale is in 10cm increments.	Error! Bookmark not defined.
Figure 46 - View of storage silo connected to the house. The scale is in 10cm increments... ..	67
Figure 47 - Old shed (WWF1-08b). The scale is in 10cm increments.	68
Figure 48 - Two labourer houses found near the house (WWF1-08c).....	68
Figure 49 - Bigger farm shed found (WWF1-08d). The scale is in 10cm increments.	68
Figure 50 - Kraals found located next to the shed (WWF1-08d). The scale is in 10cm increments.	68
Figure 51 - Second storage silo identified (WWF1-08e).	69

Figure 52 - View of a structure (red polygon) found near site WWF1-08a on Topographic map 3225DC Niekerkberg, 1979.	69
Figure 53 - View of two labourer houses at site WWF1-09.	71
Figure 54 - View site WWF1-10.	72
Figure 55 - General view of the graves found at site WWF1-11.	74
Figure 56 - View of a packed stone grave. The scale is in 10cm increments.	74
Figure 57 - View of an upright stone marker. The scale is in 10cm increments.	75
Figure 58 - View of the graves found at site WWF1-12.	77
Figure 59 - Graves with packed stones. The scale is in 10cm increments.	77
Figure 60 - Grave with packed stones covered in vegetation. The scale is in 10cm increments.	78
Figure 61 - Headstone of grave contains an inscription that has faded. The scale is in 10cm increments.	78
Figure 62 - Grave that belongs to Catharina Wilhelmina Dolphina Bester (De Klerk). The scale is in 10cm increments.	78
Figure 63 - View of a packed stone grave found on-site WWF1-13. The scale is in 10cm increments.	80
Figure 64 - Grave covered in grassy vegetation. The scale is in 10cm increments.	80
Figure 65 - Grave marked with two upright stones. The scale is in 10cm increments.	80
Figure 66 - General view of the graves. The scale is in 10cm increments.	82
Figure 67 - View of a grave with packed stones and an upright stone grave marker. The scale is in 10cm increments.	82
Figure 68 - View of a packed stone grave found at WWF1-14. The scale is in 10cm increments.	82
Figure 69 - Extract of the 1:250 000 3324 Port Elizabeth Geological Map (Council of Geosciences [Pretoria]) indicating the Western Block (Hamlett) Wind Farms.	85
Figure 70 – Overlay of the Hamlett Wind Farm on the palaeosensitivity map from the SAHRIS database. This shows that most of the proposed development footprint (blue polygon) falls in an area that is coloured red and blue, which is rated as Low to Very High sensitivity.	87
Figure 71 – Map of the land cover and broad land use patterns. Protected areas are indicated in green (Source: LOGIS/Du Plessis, 2021).	91
Figure 72 - Cumulative map of WEF developments within the western section of the Cookhouse REDZ (Source: Savannah Environmental).	92
Figure 73 - Map of the Terrain morphology (Source: LOGIS/Du Plessis, 2021).	93
Figure 74 - Access Road from the N10 to the proposed Hamlett project site (du Plessis, 2021).	95
Figure 75 - View of the development site from the N10 national road (du Plessis, 2021).	95
Figure 76 - Section of the Military Sketch of that part of the Colony of the Cape of Good Hope indicating the different Military Posts, Farms, Roads, and Rivers. Faithfully Delineated By Wily of His Majesty's 83 Regt in the year 1816. Several military posts are located on the farms between Grahamstown and Somerset. The posts were connected by several roads linking each	

of the farms. Approximate location of the Hamlet Wind Farm indicated by the red square (Cartographer: Wily & Faden, 1818)..... 96

Figure 77 - Section of the Plan of the Eastern Frontier Cape of Good Hope (Cartographer: Reid, 1847). Note the various roads interlinking the various farms between Grahamstown and Somerset, as well as the meandering Great Fish River and Little Fish River that runs through the area. Approximate location of the Hamlet Wind Farm indicated by the red square. 97

List of Tables

Table 1 - Heritage management recommendations.....	viii
Table 2 – List of abbreviations used in this report.....	xxv
Table 3 - Reporting requirements for GN648.....	6
Table 4 -Tangible heritage sites in the study area	46
Table 5 - Landform type to heritage find matrix.....	46
Table 6 - Sites identified during the heritage survey	49
Table 7 - SAHRIS palaeosensitivity ratings table.....	87
Table 8 - Impact Assessment Table for Historical structures of low significance	103
Table 9 - Impact Assessment Table for Graves and Burial Grounds.....	104
Table 10 - Impact Assessment Table for Palaeontological Resources (After Butler, 2020) .	105
Table 11 - Impact Assessment Table for Cultural Landscape	107
Table 12 – Cumulative Impact Assessment Table for Historical structures of low significance	109
Table 13 – Cumulative Impact Assessment Table for Graves and Burial Grounds.....	110
Table 14 – Cumulative Impact Assessment Table for Palaeontological Resources (After Butler, 2020).....	111
Table 15 – Cumulative Impact Assessment Table for Cultural Landscape.....	111
Table 16 - Lead times for permitting and mobilisation.....	116
Table 17 - Heritage Management Plan for EMPr implementation.....	117
Table 18 - Heritage management recommendations.....	124

List of Appendices

A	Heritage Assessment Methodology
B	Project team CV's
C	Letter - Cultural Landscape Assessment in REDZ Areas
D	Palaeontological Impact Assessment

TERMINOLOGY AND ABBREVIATIONS

Archaeological resources

This includes:

- material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years including artefacts, human and hominid remains and artificial features and structures;
- rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation;
- wrecks, being any vessel or aircraft, or any part thereof, which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the republic as defined in the Maritimes Zones Act, and any cargo, debris or artefacts found or associated therewith, which is older than 60 years or which SAHRA considers to be worthy of conservation;
- features, structures and artefacts associated with military history which are older than 75 years and the site on which they are found.

Cultural significance

This means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance

Cultural Landscapes Terminology

“perceptual qualities” Aspects of a landscape which are perceived through the senses, specifically views and aesthetics.

“cultural landscape” A representation of the combined worlds of nature and of man illustrative of the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both external and internal (World Heritage Committee, 1992). Includes and extends beyond the study site boundaries.

“cultural landscape area” These are single unique areas which are the discrete geographical areas of a particular landscape type. Each will have its own individual character and identity, even though it shares the same generic characteristics with other areas of the same type.

“study site” The study site is assumed to include the area within the boundaries of the proposed development

“characteristics” elements, or combination of elements, which make a particular contribution to distinctive character.

“elements” individual components which make up the landscape, such as trees and fences.

“landscape character” A distinct, and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.

“landscape character assessment” This is the process of identifying and describing variation in the character of the landscape. It seeks to identify and explain the unique combination of elements and features (characteristics) that make landscapes distinctive. This process results in the production of a Landscape Character Assessment.

“sense of place” The unique quality or character of a place, whether natural, rural or urban. It relates to uniqueness, distinctiveness or strong identity.

“scenic route” A linear movement route, usually in the form of a scenic drive, but which could also be a railway, hiking trail, horse-riding trail or 4x4 trail.

Development

This means any physical intervention, excavation, or action, other than those caused by natural forces, which may in the opinion of the heritage authority in any way result in a change to the nature, appearance or physical nature of a place or influences its stability and future well-being, including:

- construction, alteration, demolition, removal or change in use of a place or a structure at a place;
- carrying out any works on or over or under a place;
- subdivision or consolidation of land comprising a place, including the structures or airspace of a place;
- constructing or putting up for display signs or boards;
- any change to the natural or existing condition or topography of land; and
- any removal or destruction of trees, or removal of vegetation or topsoil

Earlier Stone Age

The archaeology of the Stone Age between ~300 000 and 3 300 000 years ago.

Fossil

Mineralised bones of animals, shellfish, plants and marine animals. A trace fossil is the track or footprint of a fossil animal that is preserved in stone or consolidated sediment.

Heritage

That which is inherited and forms part of the National Estate (historical places, objects, fossils as defined by the National Heritage Resources Act 25 of 1999).

Heritage resources

This means any place or object of cultural significance and can include (but not limited to) as stated under Section 3 of the NHRA,

- places, buildings, structures and equipment of cultural significance;
- places to which oral traditions are attached or which are associated with living heritage;
- historical settlements and townscapes;
- landscapes and natural features of cultural significance;
- geological sites of scientific or cultural importance;

- archaeological and palaeontological sites;
- graves and burial grounds, and
- sites of significance relating to the history of slavery in South Africa

Holocene

The most recent geological time period which commenced 10 000 years ago.

Later Stone Age

The archaeology of the last 30 000 years associated with fully modern people.

Late Iron Age (Early Farming Communities)

The archaeology of the last 1000 years up to the 1800's, associated with iron-working and farming activities such as herding and agriculture.

Middle Stone Age

The archaeology of the Stone Age between 30 000-300 000 years ago, associated with early modern humans.

Palaeontology

Any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trace.

Site

Site in this context refers to an area place where a heritage resource is located and not a proclaimed heritage site as contemplated under s27 of the NHRA.

Table 2 – List of abbreviations used in this report

Abbreviations	Description
AIA	Archaeological Impact Assessment
ASAPA	Association of South African Professional Archaeologists
BA	Basic Environmental Assessment
BESS	Battery energy storage system
CL	Cultural Landscape
CLA	Cultural Landscape Assessment
CRM	Cultural Resource Management
DEFF	Department of Environmental Affairs, Forestry and Fisheries
ECPHRA	Eastern Cape Provincial Heritage Resources Authority
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EIA practitioner	Environmental Impact Assessment Practitioner
ESA	Earlier Stone Age
GN	Government Notice
GPS	Global Positioning System
HIA	Heritage Impact Assessment
HMP	Heritage management plan
I&AP	Interested & Affected Party
LIA	Late Iron Age
LSA	Late Stone Age
MSA	Middle Stone Age
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
O&M	Operation and Maintenance
PGS	PGS Heritage (Pty) Ltd
PIA	Palaeontological Impact Assessment
PV	Photovoltaic
RE	Renewable Energy
REDZ	Renewable Energy Development Zone
SADC	Southern African Development Community
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System
SEA	Socio-Economic Assessment
SED	Socio-Economic Development
VIA	Visual Impact Assessment
WEFs	Wind Energy Facilities

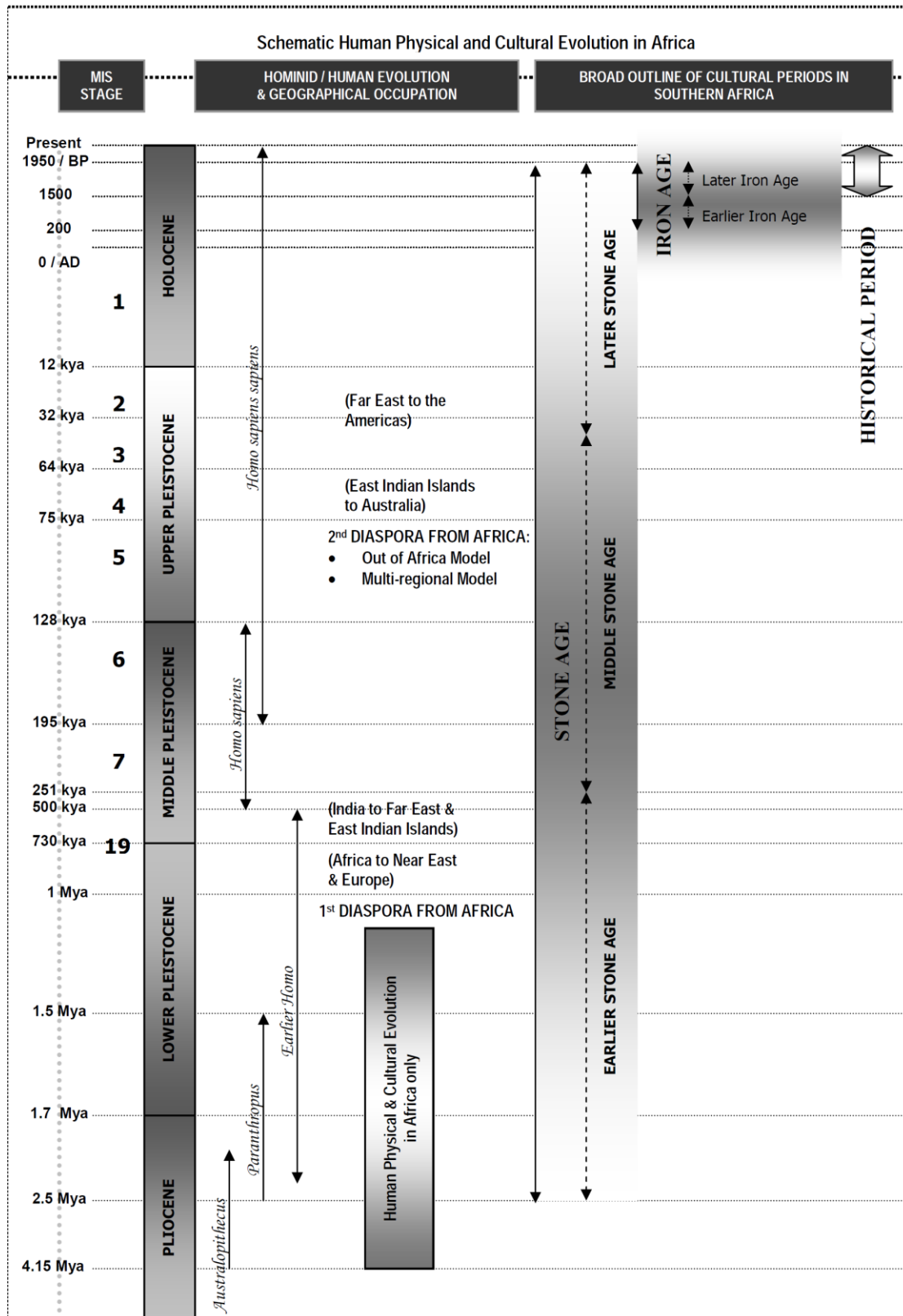


Figure 1 – Human and Cultural Timeline in Africa (Morris, 2008)

1 INTRODUCTION

PGS Heritage (Pty) Ltd (PGS) was appointed by Savannah Environmental (Pty) Ltd (Savannah) to undertake a Heritage Impact Assessment (HIA) and Palaeontological Impact Assessment (PIA) which will serve to inform the Basic Assessment Report (BAR) and Environmental Management Programme (EMPr) for the proposed Hamlett Wind Farm, between Makhanda (previously known as Grahamstown) and Somerset East, Eastern Cape.

1.1 Scope of the Study

The aim of the study is to identify possible heritage sites and finds that may occur in the proposed development area considered for the development of the Hamlett Wind Farm. The HIA aims to inform the BAR in the development of a comprehensive EMPr to assist the project applicant in responsibly managing the identified heritage resources in order to protect, preserve, and develop them within the framework provided by the National Heritage Resources Act (Act 25 of 1999) (NHRA).

1.2 Specialist Qualifications

This HIA was compiled by PGS.

The staff at PGS have a combined experience of nearly 90 years in the heritage consulting industry. PGS and its staff have extensive experience in managing HIA processes. PGS will only undertake heritage assessment work where they have the relevant expertise and experience to undertake that work competently.

Cherene de Bruyn, the author of this report, is registered with the Association of Southern African Professional Archaeologists (ASAPA) as a Professional Archaeologist and is accredited as a Principal Investigator and Field Director, she is further also a member of the International Association for Impact Assessment South Africa (IAIASA). She holds a MA in Archaeology, BSc (Hons) in Physical Anthropology and a BA (Hons) in Archaeology.

Wouter Fourie, the Project Coordinator, is registered with the ASAPA as a Professional Archaeologist and is accredited as a Principal Investigator; he is further an Accredited Professional Heritage Practitioner with the Association of Professional Heritage Practitioners (APHP).

Elize Butler the director of Banzai Environmental (Pty) Ltd has an MSc in Palaeontology from the University of the Free State, Bloemfontein, South Africa. She has been working in Palaeontology for more than twenty-four years. She has extensive experience in locating, collecting and curating fossils, including exploration field trips in search of new localities in the Karoo Basin. She has been a member

of the Palaeontological Society of South Africa for 10 years. She has been conducting Palaeontological Impact Assessments since 2014.

1.3 Assumptions and Limitations

Not detracting in any way from the comprehensiveness of the fieldwork undertaken, it is necessary to realise that the heritage resources located during the fieldwork do not necessarily represent all the possible heritage resources present within the area. Various factors account for this, including the subterranean nature of some archaeological sites and the current vegetation cover. Due to time restrictions and the large extent of the proposed project area the survey was limited to priority areas, that most likely contained heritage resources. As such, should any heritage features and/or objects not included in the present inventory be located or observed, a heritage specialist must immediately be contacted.

Such observed or located heritage features and/or objects may not be disturbed or removed in any way until such time that the heritage specialist has been able to make an assessment as to the significance of the site (or material) in question. This applies to graves and cemeteries as well. In the event that any graves or burial places are located during the development, the procedures and requirements pertaining to graves and burials will apply as set out below.

1.4 Identification of Policies, Legislation, Standards & Guidelines

1.4.1 Statutory Framework: The National Heritage Resources (Act 25 of 1999)

The NHRA has applicability, as the study forms part of an overall HIA in terms of the provisions of Section 34, 35, 36 and 38 of the NHRA and forms part of a heritage scoping study that serves to identify key heritage resources, informants, and issues relating to the palaeontological, archaeological, built environment and cultural landscape, as well as the need to address such issues during the impact assessment phase of the HIA process.

The NHRA is utilized as the basis for the identification, evaluation and management of heritage resources and in the case of Cultural Resource Management (CRM) those resources specifically impacted on by development as stipulated in Section 38 of NHRA. This study falls under s38(8) and requires comment from the Eastern Cape Provincial Heritage Resources Authority (ECPHRA).

1.4.2 Section 3 - National estate

3) Without limiting the generality of subsections (1) and (2), a place or object is to be considered part of the national estate if it has cultural significance or other special value because of—

- a) its importance in the community, or pattern of South Africa's history;

- b) its possession of uncommon, rare or endangered aspects of South Africa's natural or cultural heritage;
- c) its potential to yield information that will contribute to an understanding of South Africa's natural or cultural heritage;
- d) its importance in demonstrating the principal characteristics of a particular class of South Africa's natural or cultural places or objects;
- e) its importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- f) its importance in demonstrating a high degree of creative or technical achievement at a particular period;
- g) its strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- h) its strong or special association with the life or work of a person, group or organisation of importance in the history of South Africa; and
- i) sites of significance relating to the history of slavery in South Africa.

1.4.3 Section 34 – Structures

According to Section 34 of the NHRA, no person may alter, damage or destroy any structure, which forms part of the sites built environment older, that is 60 years without the necessary permits from the relevant provincial heritage authority.

1.4.4 Section 35 – Archaeology, Palaeontology and Meteorites

According to Section 35 (Archaeology, Palaeontology and Meteorites) and Section 38 (Heritage Resources Management) of the NHRA, Palaeontological Impact Assessments (PIA) is required by law in the case of developments in areas underlain by potentially fossiliferous (fossil-bearing) rocks, especially where substantial bedrock excavations are envisaged, and where human settlement is known to have occurred during prehistory and the historic period.

1.4.5 Section 36 – Burial Grounds & Graves

A section 36 permit application is made to the SAHRA or the competent provincial heritage authority which protects burial grounds and graves that are older than 60 years and must conserve and generally care for burial grounds and graves protected in terms of this section, and it may make such arrangements for their conservation as it sees fit. SAHRA must also identify and record the graves of victims of conflict and any other graves which it deems to be of cultural significance and may erect memorials associated with these graves and must maintain such memorials. A permit is required under the following conditions:

Permitting requirements for burial grounds and graves older than 60 years to the South African Heritage Resources Agency:

- a) destroy, damage, alter, exhume or remove from its original position or otherwise disturb the grave of a victim of conflict, or any burial ground or part thereof which contains such graves.
- b) destroy, damage, alter, exhume, remove from its original position or otherwise disturb any grave or burial ground older than 60 years which is situated outside a formal cemetery administered by a local authority; or
- c) bring onto or use at a burial ground or grave referred to in paragraph (a) or (b) any excavation equipment, or any equipment which assists in the detection or recovery of metals.
- d) SAHRA or a provincial heritage resources authority may not issue a permit for the destruction or damage of any burial ground or grave referred to in subsection (3)(a) unless it is satisfied that the applicant has made satisfactory arrangements for the exhumation and re-interment of the contents of such graves, at the cost of the applicant.

1.4.6 Section 38 HIA as a Specialist Study within the EIA in terms of Section 38(8)

The NHRA Section 38 (Heritage Impact Assessments) application to ECPHRA is required when the proposed development triggers one or more of the following activities:

Permitting requirements for demolition of built environment features:

- a) the construction of a road, wall, power line, pipeline, canal or other similar forms of linear development or barrier exceeding 300m in length;
- b) the construction of a bridge or similar structure exceeding 50 m in length;
- c) any development or other activity which will change the character of a site,
 - i. exceeding 5 000 m² in extent; or
 - ii. involving three or more existing erven or subdivisions thereof; or
 - iii. involving three or more erven or divisions thereof which have been consolidated within the past five years; or
 - iv. the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority;
- d) the re-zoning of a site exceeding 10 000 m² in extent; or
- e) any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority

In this instance, the heritage assessment for the property is to be undertaken as a component of the Basic Assessment (BA) process for the project. Provision is made for this in terms of Section 38(8) of the NHRA, which states that:

An HIA report is required to identify, and assess archaeological resources as defined by the Act, assess the impact of the proposal on the said archaeological resources, review alternatives and recommend mitigation (see methodology above).

Section 38 (3) Impact Assessments are required, in terms of the statutory framework to conform to basic requirements as laid out in Section 38(3) of the NHRA. These are:

- The identification and mapping of heritage resources in the area affected
- The assessment of the significance of such resources
- The assessment of the impact of the development on the heritage resources
- An evaluation of the impact on the heritage resources relative to sustainable socio/economic benefits
- Consideration of alternatives if heritage resources are adversely impacted by the proposed development
- Consideration of alternatives
- Plans for mitigation in the future.

1.4.7 *World Heritage Convention*

The United Nations Educational, Scientific and Cultural Organization (UNESCO) Operational Guidelines for the World Heritage Convention (2017) define Cultural Landscapes as:

- Cultural properties that represent the "combined works of nature and of man". They are illustrative of the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both external and internal.
- Cultural landscapes should be selected based on their representation in terms of a clearly defined geo-cultural region and also for their capacity to illustrate the essential and distinct elements of such regions.
- Cultural landscapes often reflect the specific techniques of sustainable land use, considering the characteristics and limits of the natural environment they are established in, and a specific spiritual relation to nature.

1.4.8 *Renewable Energy Development Zone*

The proposed Hamlet Wind Farm is situated in the Cookhouse Renewable Energy Development Zone (REDZ) and the Eastern Corridor of the Strategic Transmission Corridors. The REDZ was proclaimed in February 2018 (published under Government Notice No. 114 in Government Gazette No. 41445 of 16 February 2018; and Government Gazette 43528, Notice 786 for consultation with the intention to identify three additional REDZ to the eight REDZ) and allows for the completion of a BA in the case of large-scale wind and solar developments situated within the REDZ.

1.4.9 *Notice 648 of the Government Gazette 45421*

Although the minimum standard for archaeological (2007) and palaeontological (2012) assessments were published by SAHRA, Government Notice (GN) 648 requires sensitivity verification for a site selected on the national web-based environmental screening tool for which no specific assessment protocol related to any theme has been identified. The requirements for this GN is listed in Table 3 and the applicable section in this report noted.

Table 3 - Reporting requirements for GN648.

GN 648	Relevant section in report	Where not applicable in this report
2.2 (a) a desk top analysis, using satellite imagery;	section 4	
2.2 (b) a preliminary on-site inspection to identify if there are any discrepancies with the current use of land and environmental status quo versus the environmental sensitivity as identified on the national web based environmental screening tool, such as new developments, infrastructure, indigenous/pristine vegetation, etc.	section 5	-
2.3(a) confirms or disputes the current use of the land and environmental sensitivity as identified by the national web based environmental screening tool;	section 5	-
2.3(b) contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity;	Section 5 provides a description of the current use and confirms the status in the screening report	

An assessment of the Environmental Screening tool provides the following sensitivity ratings for archaeological and heritage resources (**Figure 2**) as well as palaeontological resources as a medium to high (**Figure 3**).

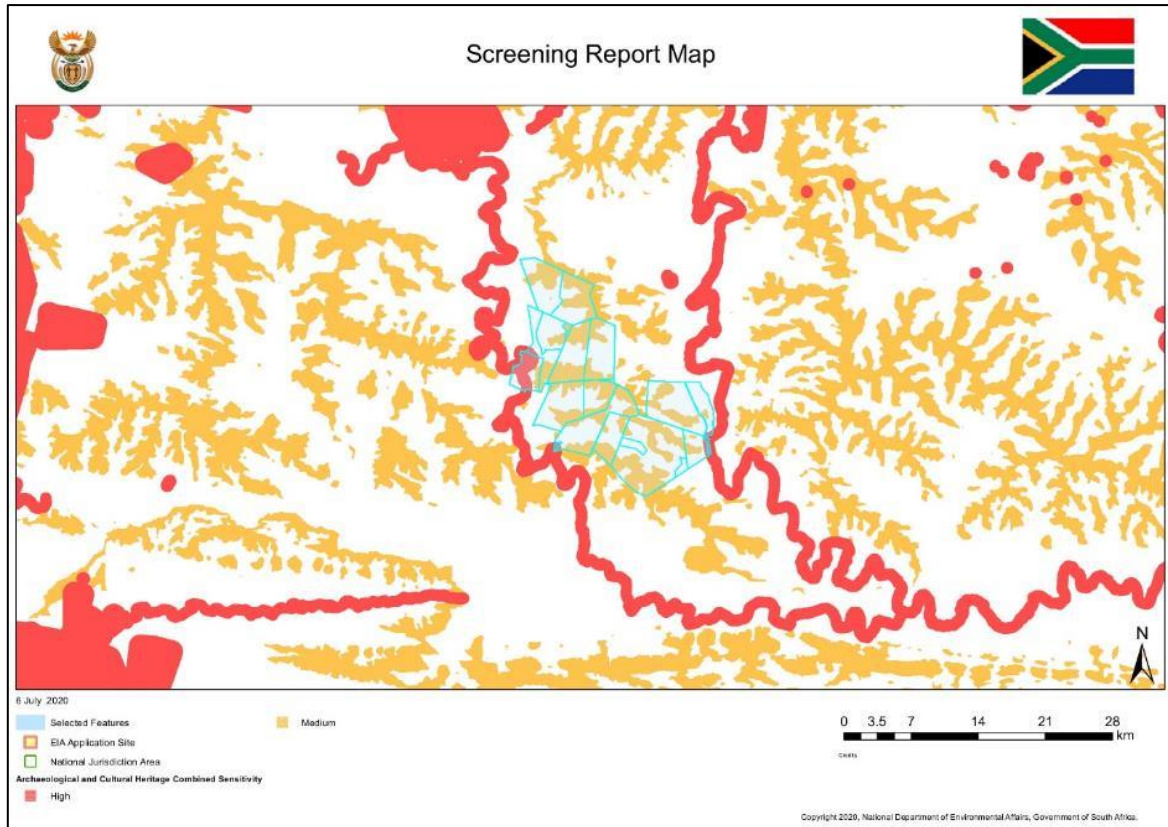


Figure 2 - Environmental screening tool - archaeological and heritage sensitivity that includes the Hamlett Wind Farm project area.

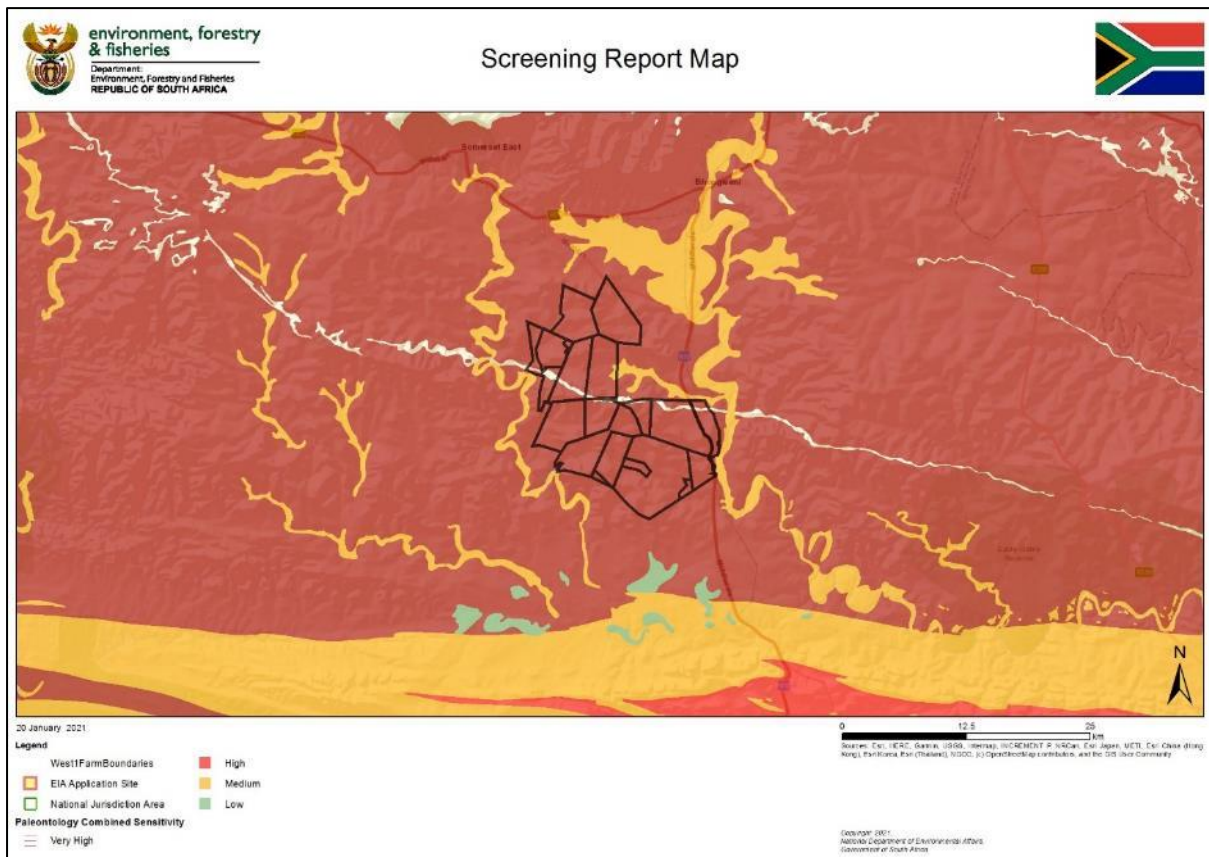


Figure 3 - Environmental screening tool - palaeontology sensitivity that includes the Hamlett Wind Farm project area.

1.4.10 NEMA – Appendix 6 requirements

The HIA report has been compiled considering the National Environmental Management Act (Act No. 107 of 1998) (NEMA) and Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) Appendix 6 requirements for specialist reports as indicated in the table below. For ease of reference, the table below provides cross-references to the report sections where these requirements have been addressed. It is important to note, that where something is not applicable to this HIA, this has been indicated in the table below.

Table - Reporting requirements as per NEMA, as amended, Appendix 6 for specialist reports.

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	Relevant section in report	Comment where not applicable.
1.(1) (a) (i) Details of the specialist who prepared the report	Page 2 of Report – Contact details and company	-
(ii) The expertise of that person to compile a specialist report including a curriculum vita	Section 1.2 – refer to Appendix C	-
(b) A declaration that the person is independent in a form as may be specified by the competent authority	Page ii of the report	-
(c) An indication of the scope of, and the purpose for which, the report was prepared	Section 1.1	-
(cA) An indication of the quality and age of base data used for the specialist report	Section 3	-
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 67	-
(d) The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment	Section 3 and 4	-
(e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 3 and Appendix A and B	-
(f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 4 and 5	-
(g) An identification of any areas to be avoided, including buffers	Section 4	-
(h) A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	Figure 4 and Section 4	
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 1.3	-
(j) A description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment	Section 7 and 8	

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	Relevant section in report	Comment where not applicable.
(k) Any mitigation measures for inclusion in the EMPr	Section 4	
(l) Any conditions for inclusion in the environmental authorisation		Non required
(m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 4, 5 and 7	
(n)(i) A reasoned opinion as to whether the proposed activity, activities or portions thereof should be authorised and	Section 8	
(n)(iA) A reasoned opinion regarding the acceptability of the proposed activity or activities; and		
(n)(ii) If the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Section 8	-
(o) A description of any consultation process that was undertaken during the course of carrying out the study		Not applicable. A public consultation process was handled as part of the BA and EMPr process.
(p) A summary and copies if any comments that were received during any consultation process		Not applicable. To date no comments regarding heritage resources that require input from a specialist have been raised.
(q) Any other information requested by the competent authority.		Not applicable.
(2) Where a government notice by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	NEMA Appendix 6 and GN648 SAHRA guidelines on HIAs, PIAs and AIAs	

2 SITE LOCATION AND DESCRIPTION

2.1 Locality and Site Description

The following project background and technical description have been supplied by Savannah Environmental (Pty) Ltd.

Hamlett (Pty) Ltd is proposing the development of a commercial wind farm and associated infrastructure on a site located approximately 27km south-east of Somerset East and 20km south-west of Cookhouse (measured from the centre of the site) within the Blue Crane Route Local Municipality and the Sarah Baartman District Municipality in the Eastern Cape Province.

A preferred project site with an extent of ~14 329ha has been identified by Hamlett (Pty) Ltd as a technically suitable area for the development of the Hamlett Wind Farm with a contracted capacity of up to 333MW that can accommodate up to 37 turbines. The entire project site is located within the Cookhouse Renewable Energy Development Zone (REDZ). Due to the location of the project site within the REDZ, a Basic Assessment (BA) process will be undertaken in accordance with GN114 as formally gazetted on 16 February 2018. The project site comprises the following twelve (12) farm portions:

- Farm Vaalkop No 164
- Remainder of Portion 1 (Middlevale) of Farm Van Aardts Kraal No 163
- Portion 1 of Farm Jaskraal No 160
- Remainder of Farm Riet Fontein A No 159
- Portion 1 of Farm Riet Fontein A No 159
- Remainder of Farm Jaskraal No 160
- Remainder of Farm Nieuwe Grond A No 129
- Remainder of Farm Wilton No 409
- Portion 2 of Farm Middleton No 219
- Remainder of Farm Bloemhof No 166
- Farm Wilde Honden Kloof No 216
- Portion 1 of the Farm Bloemhof 166

The following infrastructure is encountered in the area:

- Provincial roads (R334);
- Residential properties;
- Agricultural properties;
- Power lines
- Railway lines

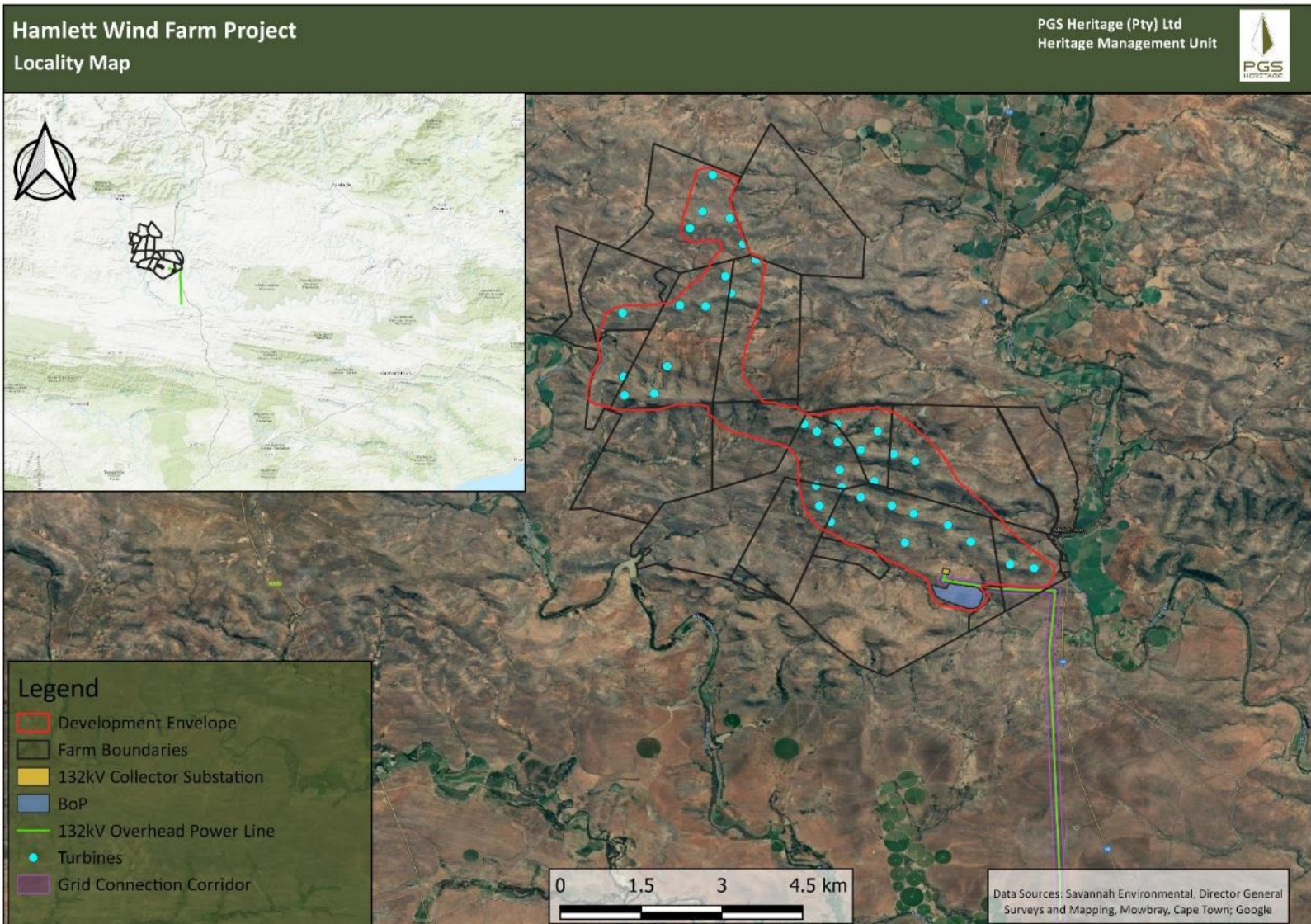


Figure 4 - Locality map of the Hamlett Wind Farm illustrating the proposed development footprint (i.e. proposed infrastructure) within a regional context.

2.2 Technical Project Description

The Hamlett Wind Farm project site is proposed to accommodate the following infrastructure, which will enable the wind farm to supply a contracted capacity of up to 333MW:

- » Up to 37 wind turbines with a maximum hub height of up to 166m. The tip height of the turbines will be up to 246m;
- » A 132/33kV on-site collector substation to be connected to a proposed 400kV Main Transmission Substation (MTS) located to the south via a new 132kV overhead power line (twin turn dual circuit line). The development of the proposed 400kV Main Transmission Substation will be assessed as part of the separate BA process in order to obtain Environmental Authorisation;
- » Concrete turbine foundations and turbine hardstands;
- » Temporary laydown areas which will accommodate the boom erection, storage and assembly area;
- » Cabling between the turbines, to be laid underground where practical;
- » Access roads to the site and between project components with a width of approximately 4,5m;
- » A temporary concrete batching plant;
- » Staff accommodation; and
- » Operation and Maintenance buildings including a gatehouse, security building, control centre, offices, warehouses, a workshop and visitors centre.

A development envelope for the placement of the wind energy facility infrastructure (i.e. development footprint) has been identified within the project site and assessed as part of the BA process. The development envelope is ~5973ha in extent and the much smaller development footprint of ~48.6ha will be placed and sited within the development envelope.

2.2.1 Consideration of Alternatives:

For this project, no other alternatives have been proposed. A broader area was originally considered. Due to the sensitivities identified within the broader area, no alternatives were considered. However, alternative layouts for the project could be proposed depending on the outcome of the several specialist studies forming part of the BA process.

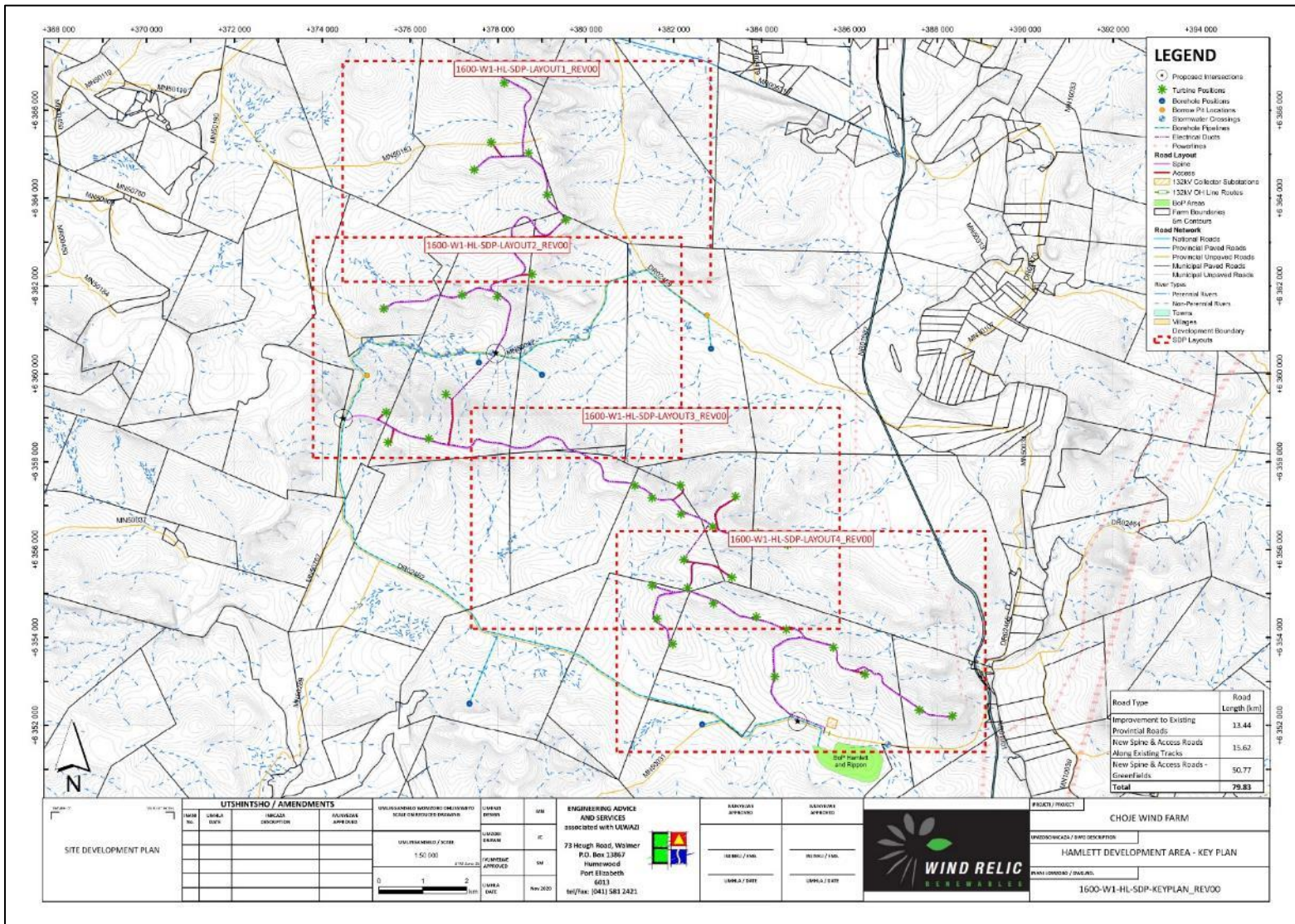


Figure 5 – Hamlett Wind Farm Site Development Plan (Provided by WindRelic).

3 CURRENT STATUS QUO

3.1 Site Description

The project area falls within the existing agricultural areas surrounding Makhanda (previously known as Grahamstown) and Somerset-West.

According to Mucina & Rutherford (2006) the Hamlett project area is characterised by the Great Fish Thicket vegetation type. This vegetation type occurs on steep slopes of deeply dissected rivers supporting short, medium and tall thicket types (Palmer 1981, Palmer et al. 1988, Evans et al. 1997), where both the woody trees and shrubs and the succulent component are well developed, with many spinescent shrubs. *Portulacaria afra* is locally dominant, decreasing in relative abundance and is replaced by *Euphorbia bothae* with increasing aridity. With increasing moisture status on southern aspects and in the riparian zone, *P. afra* is replaced by woody elements and tall emergent *Euphorbia tetragona* and *E. triangularis*. There is distinct clumping of the vegetation, which is linked to zoo-genic mounds, formed principally by termites (*Microhodotermes viator*), earthworms (*Microchaetus*), mole rats (*Cryptomus hottentotus*) and aardvarks (*Orycteropus afer*)—these islands of concentrated nutrients and moisture have richer, deep soils and are often occupied by long-lived woody shrubs and trees such as *Pappea capensis* and *Boscia oleoides* and provide deep soils for endemic geophytes. The closed canopy of the *Portulacaria afra*-dominated thicket is another distinctive feature of parts of the Great Fish Thicket. There is high heterogeneity within this vegetation unit, which has been divided into nine distinct subtypes (Vlok & Euston-Brown 2002).

Existing surrounding land uses associated with the project area include a combination of:

- farming and agricultural areas, and
- dirt roads.

As a result, the vast majority of the Hamlett Wind Farm footprint overlays highly disturbed terrain. Overall, the accessibility of the project footprint area was fairly good. Although the site has been disturbed by previous agricultural activities, visibility was fair.



Figure 6 – Access to the site from the N10



Figure 7 – View of the farm Bloemhof 166



Figure 8 – General view of the farm Jaskraal 160



Figure 9 – General view of the farm Wildenhonden Kloof 216



Figure 10 - General view of the farm Rietfontein 159



Figure 11 -General view of the farm Middleton 219



Figure 12 - General view of the farm Wilton 409

4 ASSESSMENT METHODOLOGY

This HIA report was compiled by PGS for the proposed development of the Wind Garden WEF. The applicable maps, tables and figures, are included as stipulated in the NHRA (no 25 of 1999), the NEMA (no 107 of 1998). The HIA process consisted of three steps:

Step I –Desktop Study: A detailed archaeological and historical overview of the study area and surroundings were undertaken. This work was augmented by an assessment of reports and data contained on the South African Heritage Resources Information System (SAHRIS). Additionally, an assessment was made of the available historic topographic maps. All these desktop study components were undertaken to support the fieldwork.

Step II – Physical Survey: The fieldwork was conducted over several days on 23 March 2020 as well as from 8 to 13 June 2020. This fieldwork team consisted of an archaeologist (Cherene de Bruyn) and a field assistant (Pascal Snyman). The fieldwork for the Palaeontological component was completed by a palaeontologist, Elize Butler over a 3-day site-specific field survey from 20 November to 23 November 2020 (as described in the PIA -**Appendix C**).

Step III – The final step involved the recording and documentation of relevant heritage resources, the assessment of resources in terms of the HIA criteria and report writing, as well as mapping and constructive recommendations.

4.1 Archaeological specific methodology

Additional to the preceding methodological description the archaeological methodology included fulfilling the requirements of the NHRA (section 35 and 36) that protects the following features in the landscape:

- Material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years, including artefacts, human and hominid remains and artificial features and structures;
- Rock art, being any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation;
- Graves and burial grounds, including ancestral graves, royal graves, graves of traditional leaders, graves of victims of conflict, historical graves and cemeteries, and other human remains not covered by the Human Tissue Act (1983) (Act No 65 of 1983).

4.2 Palaeontological specific methodologies

In summary, the approach to PIA was as follows. Fossil bearing rock units occurring within the broader study area is determined from geological maps and relevant geological sheet explanations as well as

satellite images. Known fossil heritage in each rock unit is inventoried from scientific literature, previous assessments of the broader study region, and the author's field experience and palaeontological database. Based on this data as well as field examination of representative exposures of all major sedimentary rock units present, the palaeosensitivity of the development area and impact significance of the proposed development is assessed together with recommendations for any further specialist palaeontological studies or mitigation. This PIA was undertaken in line with the SAHRA 2016 Minimum Standards for the palaeontological component of heritage impact assessment.

The PIA is contained in Appendix C of this report.

4.3 Cultural Landscape Assessment

4.3.1 Desktop analysis (including using satellite imagery) and literature review.

- Review of relevant Visual Impact Assessment (VIA) and Socio-economic Impact Assessment reports (SEIA) on the proposed Hamlett Wind Farm as well as other relevant assessment reports from the proposed and operational Cookhouse WEFs;
- Review of relevant academic literature and articles on cultural landscape assessment;
- Review of relevant academic literature and articles on the cultural heritage of the regional study area;
- Review of historic and current maps of the study area and surrounds;

4.3.2 Community engagement

Limited contact with landowners or farm labourers in and around the proposed development were done as part of the HIA, when they were available, to identify any heritage resources (buildings, kraals, graves, and rock art sites) and to ascertain whether any meaningful intangible heritage resources are associated with any of the built structures or natural features.

The socio-economic impact assessment report for the proposed Hamlett Wind Farm was consulted to gain insight into cultural landscapes concerns that may have been raised.

5 HISTORICAL OVERVIEW OF THE STUDY AREA

5.1 Overview of Study Area and Surrounding Landscape

DATE	DESCRIPTION
2.5 million to 250 000 years ago	<p>The Early Stone Age is the first and oldest phase identified in South Africa's archaeological history and comprises two technological phases. The earliest of these is known as Oldowan and is associated with crude flakes and hammerstones. It dates to approximately 2 million years ago. The second technological phase is the Acheulian and comprises more refined and better-made stone artefacts such as the cleaver and bifacial hand axe. The Acheulian dates back to approximately 1.5 million years ago (Korsman, & Meyer, 1999; Klein, 2000).</p> <p>Some sites dating to the ESA have been identified in the general area. These are usually concentrations of stone tools found close to watercourses (van Schalkwyk, 2010). One of the more important ESA sites occurs at Ananzi Springs, near Uitenhage. This is the only ESA site in the Eastern Cape which has been excavated (Webley and Hall, 1998). Ananzi Springs was excavated by the late HJ Deacon in the 1970s and wood and seed material, as well as a large number of stone artefacts, was found in situ in the spring deposits (Binneman et al, 2011). Scatters of ESA tools are also often found in hollows between dunes like the site of Geelhoutboom near Humansdorp (Webley and Hall, <i>ibid</i>).</p> <p>ESA stone artefacts have been found in the Addo Elephant National Park and amongst the gravels of old river terraces which line most of the Coega River and estuary (Booth, 2011). Furthermore, a scatter of some possible ESA stone artefacts was recorded on one of the adjacent properties with the area of the already authorised Cookhouse Wind Energy Facility (Booth, 2011).</p> <p><i>No ESA sites are known from the immediate vicinity of the footprint area.</i></p>
250 000 to 40 000 years ago	<p>The Middle Stone Age (MSA) is the second oldest phase identified in South Africa's archaeological history. This phase is associated with flakes, points and blades manufactured using the so-called 'prepared core' technique (Korsman, & Meyer, 1999). Several MSA sites have been identified in the Eastern Cape.</p> <p>Klasies River sites are located on the Tsitsikamma coast between Port Elizabeth and Plettenberg Bay and provide information about anatomically modern people who lived in southern Africa between 110 000 and 120 000 years ago (Steele, 2001; Mitchell, 2002). The Klasies River Mouth was excavated in 1967–1968. During the excavation's pieces of shell, animal bones and some human remains were found, that were associated with an MSA occupation of the site (Rightmire & Deacon, 1991).</p> <p>Evidence of MSA occupation has been found at Strathallan Cave B, located in the Maclear district, north-eastern Cape, approximately 500 km North-east of Uitenhage by Opperman (1996). Apart from stone tools, Opperman also excavates several hearths and grass beddings at the site.</p> <p>An MSA cave site, Howiesons Poort is located near Grahamstown (Shaw & Jameson, 2002). Several stone artefacts including backed blades were excavated from the site.</p> <p>In 1979 Opperman researched the Stormberg region. During this time, he excavated a trench at Grassridge Rockshelter, which located in the interior region of the Eastern Cape at the base of the Stormberg Mountains contains a</p>

DATE	DESCRIPTION
	<p>rich sequence of late Pleistocene and Holocene occupations (Collins <i>et al.</i>, 2017). Opperman focused on the MSA and Late Stone Age (LSA) occupation of the site and identified several stone-age tools.</p> <p>During a rescue excavation by Gess (1969), two MSA lithic artefacts and bone tools were excavated from the Aloe site near St Georges Strand, Port Elizabeth.</p> <p>The Albany Museum database holds records of the occurrence of MSA stone artefacts around the Cradock area and the Department of Archaeology has curated MSA stone artefacts in its collection from the Cradock area including Highlands Rock Shelter excavated by H.J. Deacon during the 1970s (Booth, 2011).</p> <p><i>No MSA sites are known from the immediate vicinity of the footprint area.</i></p>
40 000 years ago, to the historic past	<p>Several LSA sites are known to occur in the region, located to the west and north of the study area. The majority of archaeological sites date from the past 10 000 years and are associated with the campsites of San hunter-gatherers and Khoi pastoralists (Binneman <i>et al.</i>, 2011).</p> <p>Research by Binneman has shown that several very important LSA sites occur in the Kabeljousrivier area (inland of Jeffreys Bay). These sites include artefacts other than stone tools, like ostrich eggshell beads, bone arrowheads, small bored stones and occasionally wood fragments with incised markings (van Schalkwyk, 2010). Archaeologists believe that LSA people moved between the coast and the inland areas according to a seasonal pattern. Rock art sites are also associated with the LSA. These rock art sites are found mostly in the sandstone caves and shelters around Uitenhage, Grahamstown and Alicedale [Webley and Hall, 1998</p> <p>Another rock shelter, Mafusing 1 containing LSA lithics, pottery and rock art is located near Matatiele. The site was excavated in 2011 as part of the Matatiele Archaeology and Rock Art or MARA research programme (Pinto <i>et al.</i>, 2018).</p> <p>There are many San hunter-gatherer sites in the nearby Groendal Wilderness Area and adjacent mountains. Here, caves and rock shelters were occupied by the San during the LSA and contain numerous paintings along the walls. The last San/KhoiSan group was killed by Commandos in the Groendal area in the 1880s (Binneman <i>et al.</i>, 2011).</p> <p>LSA stone artefact manufacture site and ceramic sherds have also been found in the Winterberg Mountain Range (Booth, 2011). LSA occupational deposits of the few caves and rock shelters surrounding Grahamstown that have been excavated, namely Melkhoutboom in the Suurberg (Deacon 1976), Wilton near Alicedale, Uniondale about 20km north-east of Grahamstown (Leslie-Brooker 1987), Springs Rock Shelter and Glen Craig situated immediately north and north-east of Grahamstown, and Edgehill and Welgeluk located on the Koonap River some 40km to the north of Grahamstown (Hall 1985).</p> <p><i>No LSA sites are known from the immediate vicinity of the footprint area.</i></p>
AD 450 – AD 750	<p>In the Eastern Cape, Early Iron Age (EIA) sites dating to around the eighth century AD (700s) have been identified at Kulubele on the Kei River and Canasta Place near East London. Excavations at Kulubele have identified evidence of ironworking, ceramic sculptures, grain pits and sheep bones, and highly decorated potsherds have been found at Canasta Place (Fourie, 2011). However, Canasta Place probably represents the most southerly evidence of early farmers in the Eastern Cape (Hall & Webley, 1998).</p> <p>EIA sites have also been found within the Great Kei River Valley (Booth, 2011).</p>

DATE	DESCRIPTION
	<p>EIA sites have also been recorded by Opperman's (1987) during his research at Colwinton (located approximately 400km northeast of Uitenhage) and Bonawe, near Barkley East (Mazel, 1992). At these sites, Iron age ceramics date to AD775. Bonawe rock shelter is located near Elliot, approximately 500km north-east of Uitenhage. The site contains both end-Pleistocene and Holocene material (Booth, 2012).</p> <p>Some 2 000 years ago Khoi pastoralists occupied the region and lived mainly in small settlements. They were the first food producers in South Africa and introduced domesticated animals (sheep, goat and cattle) and ceramic vessels to southern Africa (Binneman, 2011).</p> <p><i>No EIA sites are known from the immediate vicinity of the footprint area.</i></p>
AD 1650 – AD 1850	<p>Hilltop settlement is mainly associated with the Later Iron Age (LIA) settlement patterns that occurred during the second millennium AD (Booth, 2011). LIA settlements have been formally recorded by the Albany Museum and cover a relatively extended area including within the nearby Koonap River Valley between Bedford and Grahamstown (Booth, 2011).</p> <p>The Nguni groups of South African can be divided into four distinct groups: the Zulu-speaking peoples, the Xhosa-speaking peoples, the Swazi people from Swaziland and adjacent areas and the Ndebele people (SA History, 2019c). Around the 1600s the Xhosa groups began expanding their power.</p> <p>Tshawe founded the Xhosa kingdom by defeating the Cirha and Jwarha groups (Peires, 1982; SA History, 2019c). His descendants expanded the kingdom by settling in new territory and bringing people living there under the control of the amaTshawe (SA History, 2019c). As the Xhosa expanded their influence westwards, they came into contact with Khoi and San groups. The Khoi and San groups later intermarried into the Xhosa culture Jwarha groups (SA History, 2019c). His descendants expanded the kingdom by settling in new territory and bringing people living there under the control of the amaTshawe (SA History, 2019c). From about 1700, amaXhoseni, the place of the Xhosa or Xhosaland, stretched roughly along the seaboard of South Africa between the Mbashe River and the Sundays River, from the slopes of the Khahlamba, Amathole and Winterberg mountains down the coast (Peires, 1982; Fourie, 2011).</p> <p>As the first European settlers started moving north from the Cape they came into contact with Xhosa speaking groups. In the Eastern Cape, the 18th and 19th century is marked with conflict and wars between the European settlers and the Xhosa groups (SA History, 2019c). A marked change in the conflict appeared in 1820 when John Brownlee founded a mission on the Tyhume River near Alice, and William Shaw established a chain of Methodist stations throughout the Transkei (SA History, 2019c).</p> <p>There are records of Observation Posts that were constructed under the leadership of Sir John Cradock, to keep the Xhosa from crossing the Fish River (Booth, 2011). These were in place and functioning between 1812 and 1817. Positions of observation posts include Addo Heights Post (Addo), Rautenbach's Drift (Addo), Sandflats (Paterson), Coerney, Swartwaterspoort and Kommadagga (Coetzee 1994; Booth, 2011). Several historical features and buildings were recorded during the survey for the already authorised Cookhouse Wind Energy Facility.</p> <p><i>No Late Iron Age (LIA) sites are known from the immediate vicinity of the footprint area</i></p>

5.2 Historical Background of Grahamstown Area

5.2.1 *Grahamstown (now known as Makhanda)*

Before the arrival of the British settlers, the Albany, Bathurst and Alexandria regions were known as the Zuurveld (Corry, 1920). When Britain reoccupied the Cape in 1806, the new administration found itself faced with several conflicts with the Xhosa on the Eastern frontier, as the border, the Great Fish River, was regularly breached by raiders who attacked the white farmers in the region (Erasmus, 1995). In 1811 the Xhosa launched a full scale attack against the settlers (Erasmus, 1995). This attack is known as the fourth frontier war (Erasmus, 1995). During the attack, some 20 000 Xhosa warriors stormed and drove away from the settlers once and for all (Erasmus, 1995). Many of the structures in the region were severely damaged.

To counter such an invasion Governor Sir John Cradock decided to build a line of blockhouses along the Fish River, and Colonel John Graham was selected for the task (Erasmus, 1995). When Colonel John Graham came upon the partially destroyed remains of the Rietfontein homestead he decided to build his military headquarters and garrison there (Erasmus, 1995). Grahamstown was founded in 1812 by Colonel John Graham as a frontier garrison post near the Xhosa territory (Cory, 1920). The plans for the new village were drawn up by John Knobel, the district surveyor of Uitenhage, and the first residential stands were sold in 1815 (Erasmus, 1995). The Rietfontein homestead was repaired and served as the garrison's officers mess (Erasmus, 1995). The first school in Grahamstown opening in 1814 near the wall of the garrison (Erasmus, 1995). Convent High, seen as the first "proper" school in Grahamstown opened in 1849 (Erasmus, 1995). On 22 April 1819, a large number of Xhosa warriors, under the leadership of Nxele (or Makanda), launched an attack against the British colonial forces. During the fifth frontier war, about 10 000 Xhosa Nxele (or Makanda) attacked the garrison (Erasmus, 1995). The 350 men at the garrison stood their ground and drove away the Xhosa leaving 1000 dead (Erasmus, 1995). With the arrival of settlers in 1820 and their migration through the Eastern Cape, they began to farm (Erasmus, 1995). Records relating to the distribution of the 1820 Settlers suggest that the point at which the wagon parties divided and went their respective ways took place on the farm called Assegai Bosch (Webley 2007). Here the wagon tracks split either to Salem or to Grahamstown (Webley & Way-Jones, 2007). In 1822 Grahamstown was proclaimed the seat of the magistracy of the new district of Albany (Figure 13), with Colonel Jacob Cuyler appointed as the first landdrost (Erasmus, 1995).

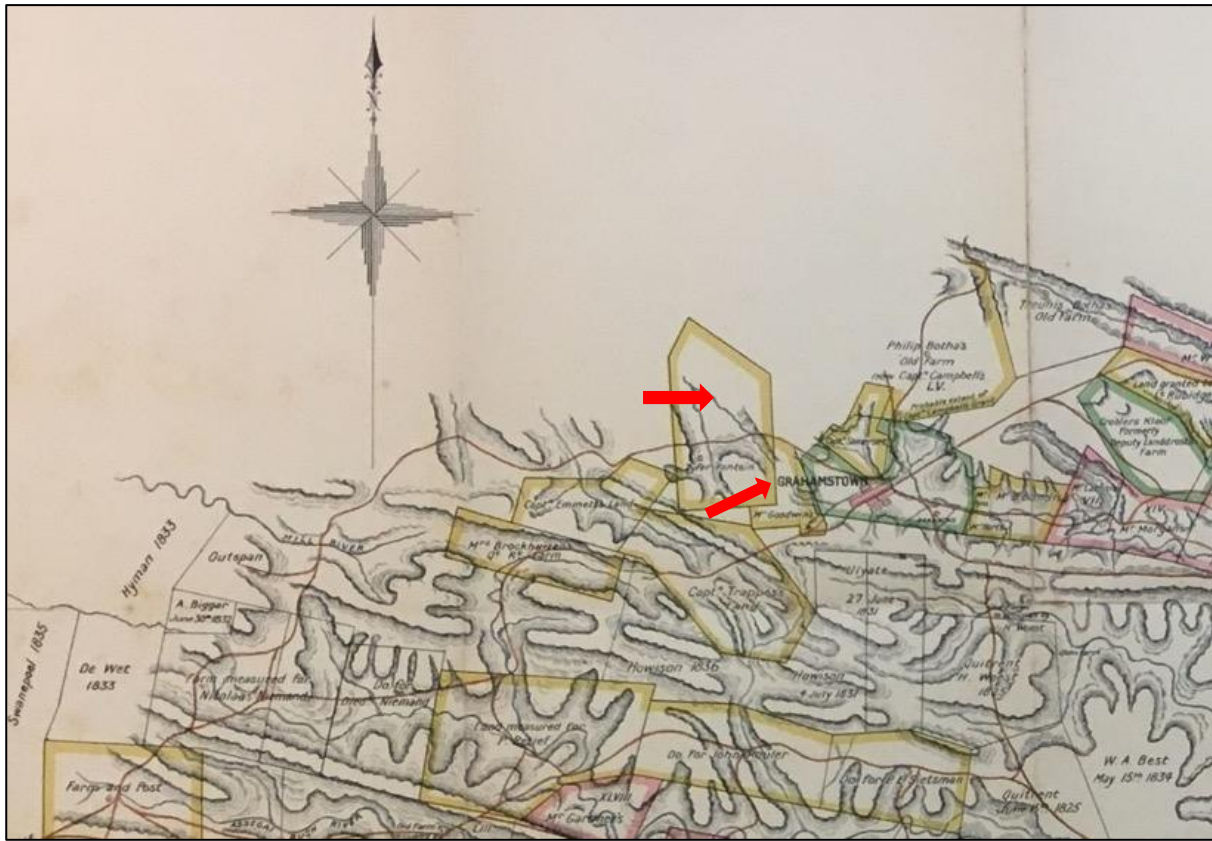


Figure 13 - Map showing District of Albany in the Colony of Good Hope, and the location of the old roads, and the approach to Grahamstown through the farm "Zyfer Fontein" and "Mr Goodwins (Red Arrow) (Source: Campbell, 1897). The study area is located to the north-west of Grahamstown and not depicted on the map.

In 1822 Grahamstown was proclaimed the seat of the magistracy of the new district of Albany, with Colonel Jacob Cuyler appointed as the first landdrost (Erasmus, 1995). In 1962 the town received full municipal status (Erasmus, 1995). Throughout 134-1850 conflict still brewed between the Xhosa's and the settlers. During this time the sixth, seventh and eight frontier war was fought (Figure 14) (Erasmus, 1995). Several heritage sites are located to the east of Grahamstown including the declared Provincial Heritage Site (PHS) of Fraser's Camp Signal Tower, constructed in 1843 during the Frontier Wars and the nearby Fraser's Camp, constructed a few years earlier (1835 / 1836), as well as the Maranatha Mission, dating to circa. 1909 (Van Ryneveld, 2016). According to the SAHRIS database Grahamstown's has approximately 60 houses, buildings and other structures listed as Grade II sites.



Figure 14 - Map showing of the Eastern Frontier in 1860 (Source: Militaryhistorysa, 2017)

5.2.1 Riebeeck East

In 1820 British Settlers was sent to colonize the Zuurveld area and to act as a buffer between the new colonies in the west and the Xhosa tribes in the east. The settlement of the British settlers led to an "anglicizing" of the area (Riebeeck East, 2013). Many of the independent Afrikaner farmers that lived in the area remained loyal to the Dutch Reformed Church and had to travel to Graaf-Reinet and Uitenhage to attend church services (Riebeeck East, 2013). The Afrikaans speaking community of farmers in the Albany District sent a petitioned for their church, but this was declined on the basis that the English church in Grahamstown should be used by the Dutchy congregation in the same way that the Dutch church in Cape Town is used by the English (Riebeeck East, 2013). One of those signatories to this petition was Piet Retief, one of the leaders on the Great Trek (Riebeeck East, 2013).

In 1830 another petition to the government was sent, and Captain Campbell, the civil commissioner was instructed to appoint elders and deacons (Theal, 2010). The new elders and deacons were installed by reverent Alexander Smith in January 1831 (Theal, 2010). The first visiting preacher was Dr George Morgan who presided at the first church gathering on 7th May 1831 on the farm Driefontein (Theal, 2010; Riebeeck East, 2013). On 2 April 1839, the church appointed Dr John Pears, as the first resident clergy (Theal, 2010; Riebeeck East, 2013). In April 1840 the church council bought the farm Mooimeisiesfontein, to establish a village and build a church (Theal, 2010; Riebeeck East, 2013). The farm Mooimeisiesfontein had belonged to Mr Piet Retief (Theal, 2010). The village of Riebeeck was established in 1842 and was named in honour of the first Dutch Governor of the Cape, Jan van Riebeeck. Its name was amended to

Riebeek East in about 1881 to differentiate it from its namesake in the Division of Malmesbury (SA History, 2019).

5.2.2 *Cookhouse*

Located on the west bank of the Great Fish River, which, until 1819 formed the eastern boundary of the Cape Colony (Erasmus, 1995). The origin of the name of the town is still debated (Van Schalkwyk, 2011). Troops patrolling the boundary often camped in these parts and eventually built small stone houses in which they sheltered and cooked (Erasmus, 1995). Some of these “cookhouses” were still visible into the 20th century, although most of them have disappeared (Erasmus, 1995). The railway from Port Elizabeth to the diamond fields in Kimberley reached Cookhouse in 1880 (Erasmus, 1995). The original railway between Cookhouse and Bedford runs over the Farm Request as well as the original road between Cookhouse and Grahamstown (Booth, 2011). According to various databases consulted it has approximately 15 houses, buildings and other structures listed as provincial heritage sites.

5.2.3 *Somerset East*

As early as 1771 land was allotted to farmer Willem Prinsloo on the banks of the Little Fish River at the Foot of the Boschberg (Erasmus, 1995). Later, part of this land came into possession of Louis Trichardt. Trichardt successful cultivation of tobacco on his land prompted Lord Charles Somerset to established Somerset Farm (Erasmus, 1995). Lord Charles Somerset, the governor at the Cape from 1814 to 1826, founded in 1814 an experimental farm in the shadow of the Boschberg. Here many different crops were grown, including tobacco which was in short supply due to the British-American War (Gaigher, 2010). After the ending of that war, tobacco production on the farm ceased but it continued to help provision the army garrison (Gaigher, 2010).

In 1825 a township was laid out on the grounds of this farm and was named after Lord Somerset (Gaigher, 2010). The "East" was to distinguish it from the other Somerset ("West") near Cape Town and was only added 30 years later. The first street of this new township was Paulet Street, at the foot of the Boschberg, and still contains many properties dating from this early era (Gaigher, 2010). In 1835 a volunteer mounted unit of about 170 of the town's citizens was formed to take part in the 6th Frontier War and also saw action in subsequent wars (Gaigher, 2010). When Dr William Gill, the district surgeon, died in 1863 he bequeathed most of his estate for an institution of higher learning but with the stipulation that none of the money is spent on erecting or acquiring buildings (Gaigher, 2010). According to the SAHRIS database Somerset East has approximately 15 houses, buildings and other structures listed as Grade II sites.

5.3 **Archival/historical maps**

The examination of historical data and cartographic resources represents a critical tool for locating and identifying heritage resources and in determining the historical and cultural context of the study area.

Relevant topographic maps and satellite imagery were studied to identify structures, possible burial grounds or archaeological sites present in the footprint area.

Topographic maps (1:50 000) for various years (1946,1976 and 1989) were assessed to observe the development of the area, as well as the location of possible historical structures and burial grounds. The maps were also used to assess the possible age of structures located, to determine whether they could be considered as heritage sites. Map overlays were created showing the possible heritage sites identified within the areas of concern, as can be seen below (Figure 15-

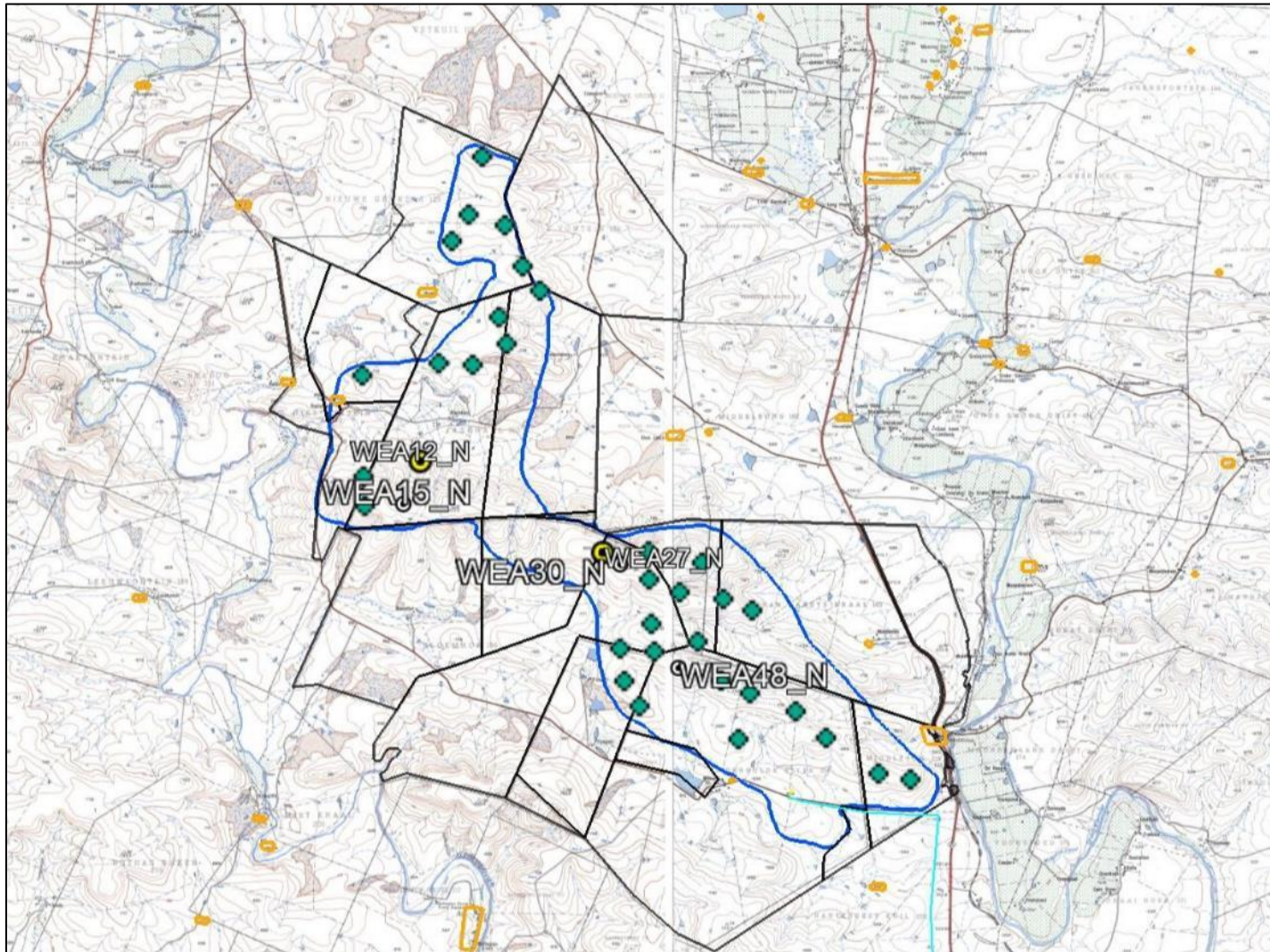


Figure 17).

The relevant topographical maps include:

- Grahamstown Topographic map. 1901.
- 3225DC Niekerkberg, surveyed in 1956 and drawn by the Trigonometrical Survey Office. Printed and published by the Government Printer 1962.
- 3225DC Niekerkberg, surveyed by the Chief Director of Surveys and Mapping. Printed and published by the Government Printer 1979.

- 3225DD Golden Valley, surveyed in 1950 and drawn by the Trigonometrical Survey Office in 1954. Printed and published by the Government Printer 1955.
- 3225DD Golden Valley, surveyed by the Chief Director of Surveys and Mapping. Printed and published by the Government Printer 1979.

It can be seen that all the map sheets consulted depict the entire project area surrounded by several huts, as well as old agricultural fields. Historical roads are also depicted.

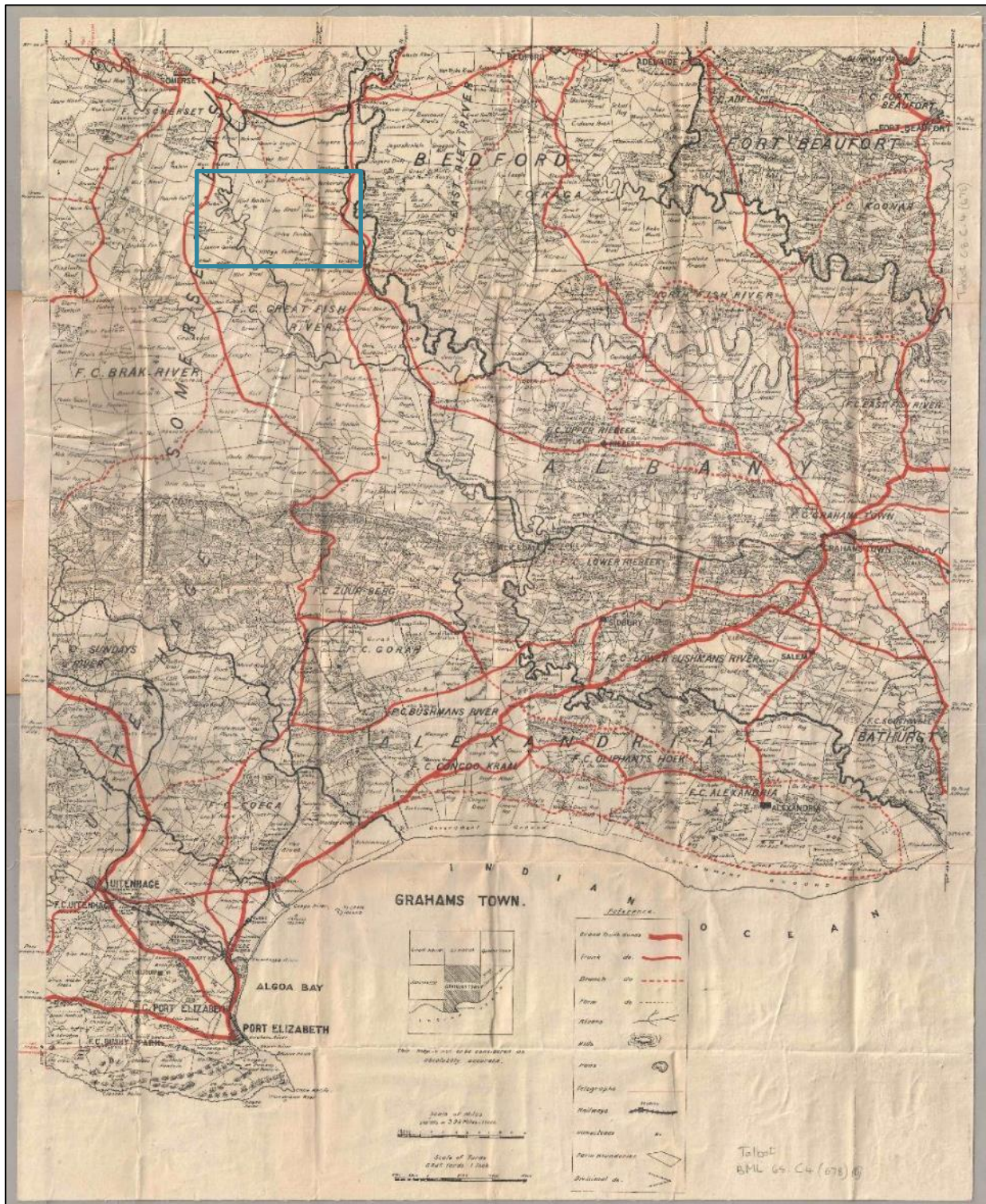


Figure 15 – Topographic map Grahamstown dating to 1901 showing the several farms, in the project area (blue polygons).

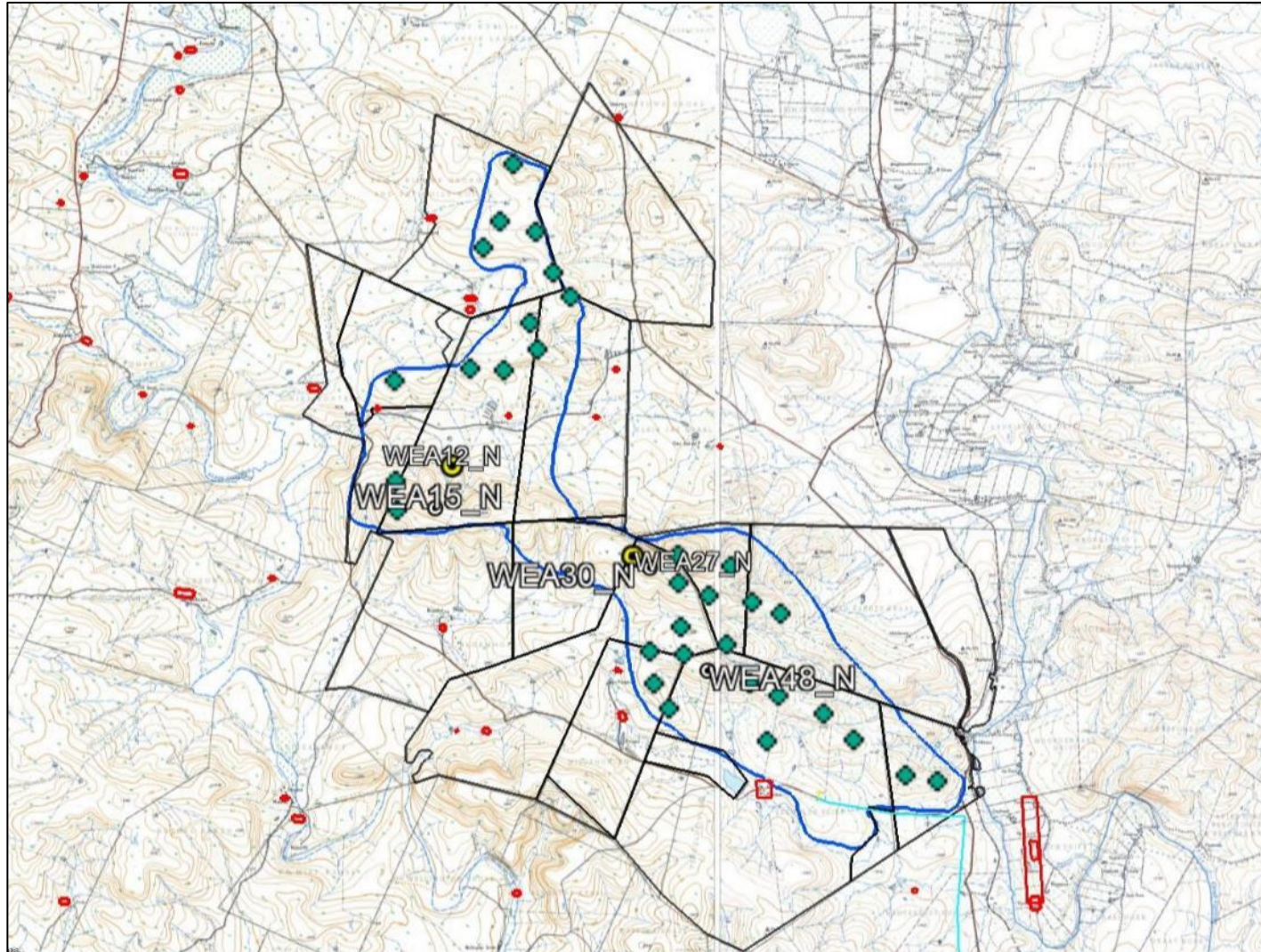


Figure 16 – First Edition Topographic map (1:50 000) 3225DC Niekerkberg dating to 1956 and First Edition Topographic map (1:50 000) 3225DD Golden Valley dating to 1950 showing the Hamlett Wind Farm with several heritage features (red polygons) located in close proximity to the project development area (blue polygon).

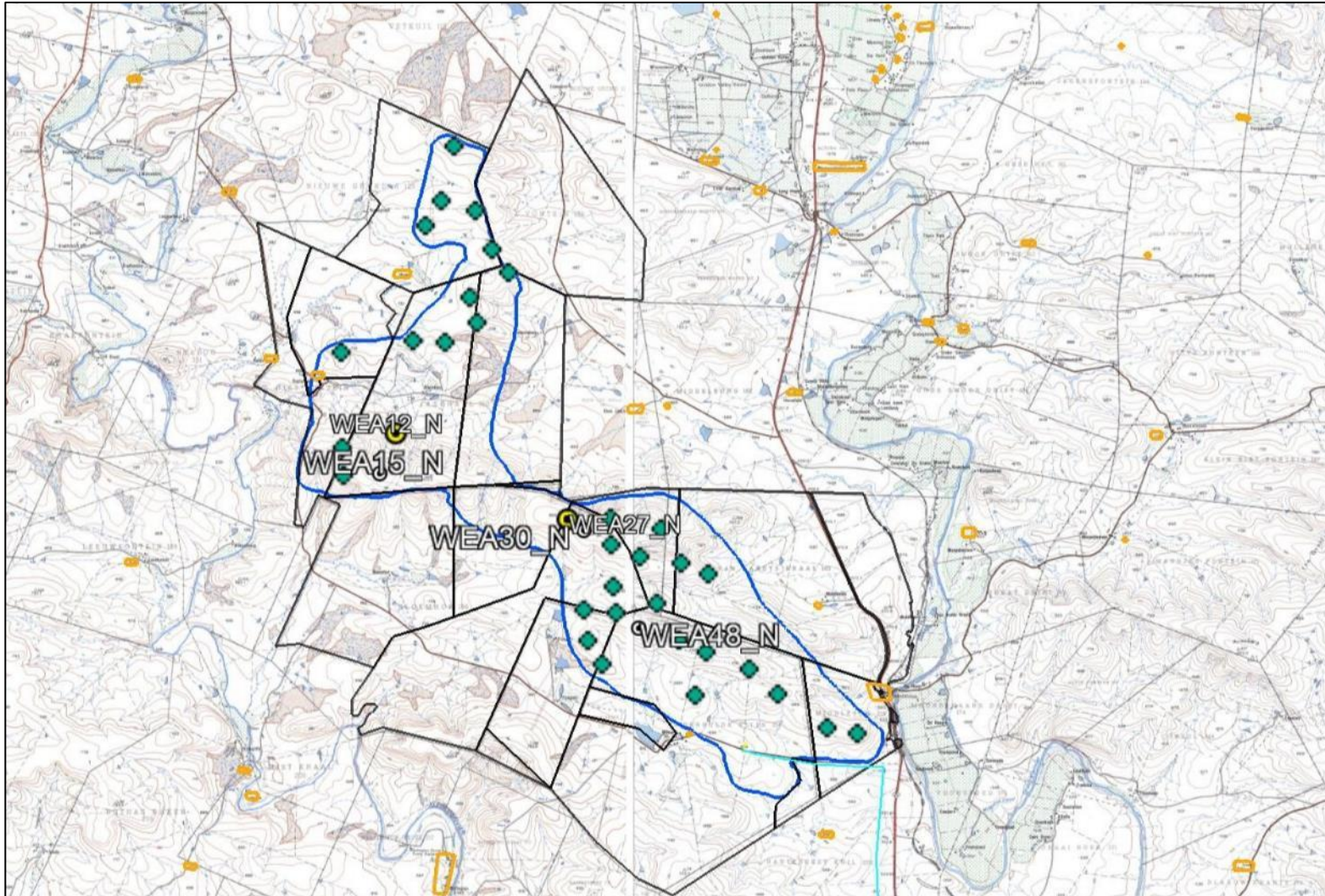


Figure 17 –Second Edition Topographic map (1:50 000) 3225DC Niekerkberg dating to 1979, and Second Edition Topographic map (1:50 000) 3225DD Golden Valley dating to 1979 showing Hamlett Wind Farm with several heritage features (orange polygons) located in close proximity to the project development area (blue polygon).

Furthermore, several SG diagrams are available from the Chief Surveyor-General database (<http://csg.dla.gov.za/>) (**Figure 18- Figure 21**).

The Farm Bloemhof 166 was surveyed by the Government Surveyor Theo. W. Bell in August 1904. Note the historic routes that crossed the farm to neighbouring farmsteads and towns. The little fish river is located in the southern corner of the farm.

The Farm Nieuwe Grond 129 was surveyed by James Swan on 21 July 1816. Several historic routes that crossed the farm to neighbouring farmsteads and towns, as well as the Nieuwe Grond His (located on Portion 1) was observed on the diagram. The remaining extent of "Nieuwe Grond" was granted to Gert Johannes Fictor on 15 June 1819, while the remaining extent of "Vet Kuil's Kop, was granted to Barend Bower on 31 December 1856. This was transferred to Antonie Christoffel Lombard on 18 August 1888. Portion 1 of the Farm Nieuwe Grond 129, was surveyed by the Land Surveyor Kim. C. Lomborg in June 1936. On 14 February 1942 Portion 1 of Nieuwe Grond was transferred to M. J. Lombard.

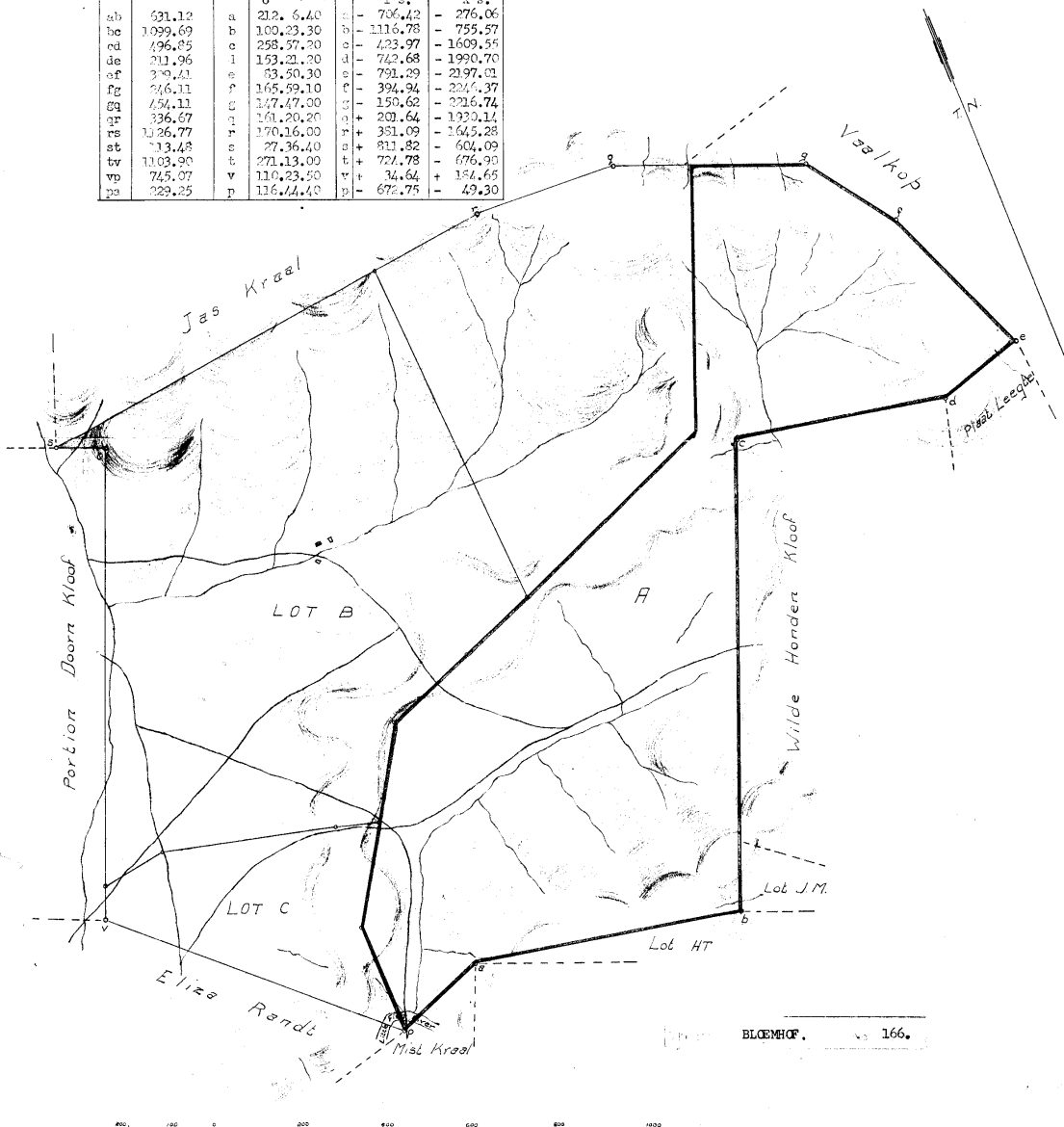
The Farm Wilton 409 surveyed in November 1988.

No SG Diagrams were available for the following farms:

- Farm Jaskraal 160
- Farm Middleton 219
- Farm Rietfontein 159
- Farm Van Aardts Kraal 163
- Farm Wildehonden Kloof 216

The numerical data of this Diagram are sufficiently consistent.
 (Sgt.) N. G. Vos,
 Examiner.

Line.	Dist.	Angles.		Co-ordinates.	
		O	H	Y's.	X's.
ab	521.12	a	212.640	- 706.42	- 276.06
bc	1099.69	b	100.23.30	- 1116.78	- 755.57
cd	496.85	c	298.57.20	- 423.97	- 1609.55
de	211.96	d	153.22.20	- 72.68	- 1990.70
ef	279.41	e	63.50.30	- 791.29	- 2197.01
fg	246.11	f	165.59.10	- 394.94	- 2247.37
ga	454.11	g	147.47.00	- 150.62	- 2216.74
ra	326.57	r	161.20.20	+ 201.64	- 1930.14
rs	1126.77	s	170.16.00	+ 351.09	- 2645.28
st	113.43	t	27.36.40	+ 811.82	- 604.09
tv	1103.90	v	271.13.00	+ 721.78	- 676.90
vp	745.07	v	110.23.50	+ 34.64	+ 184.65
pa	229.25	p	116.44.40	- 672.75	- 49.30



Scale: - 200 Cape Roads - 1 Eng. Inch.
 The above diagram lettered a. b. c. d. e. f. g. h. i. j. k. l. m. n. o. p. and known as Bloemhof represents 4517 Morgen 115 square rods of land in the Division of Somerset East, Field Cornetcy of Great Fish River, Bounded towards, by Jas Kraal, N.E. ward, by Vaalkop, S & S.E. by Flaatslegte; Wilde Honden Kloof; Lot H.T.; Mist Kraal; and Lot J.M., E. by Lot J.M.; Wilde Honden Kloof, N. & S.W. by Portion Doorn Kloof; Elize Randt. I hereby certify that the survey from which the above diagram is framed has been made by me, 29th May 1904. N. J. Moolman. M. M. Aapen.

Framed from actual survey made under the Land Beacons Amendment and Extension Act No. 9 of 1879 for Amended Title by me, (Sgt.) Theo. W. Bell, Govt. Surveyor. August 1904. BA029/1933

Sheet 003, R2.166

For list of deductions see back of diagram

I.J./C.F.L.

Figure 18 – SG-Diagram of the Farm Bloemhof 166 surveyed by the Government Surveyor Theo. W. Bell in August 1904.

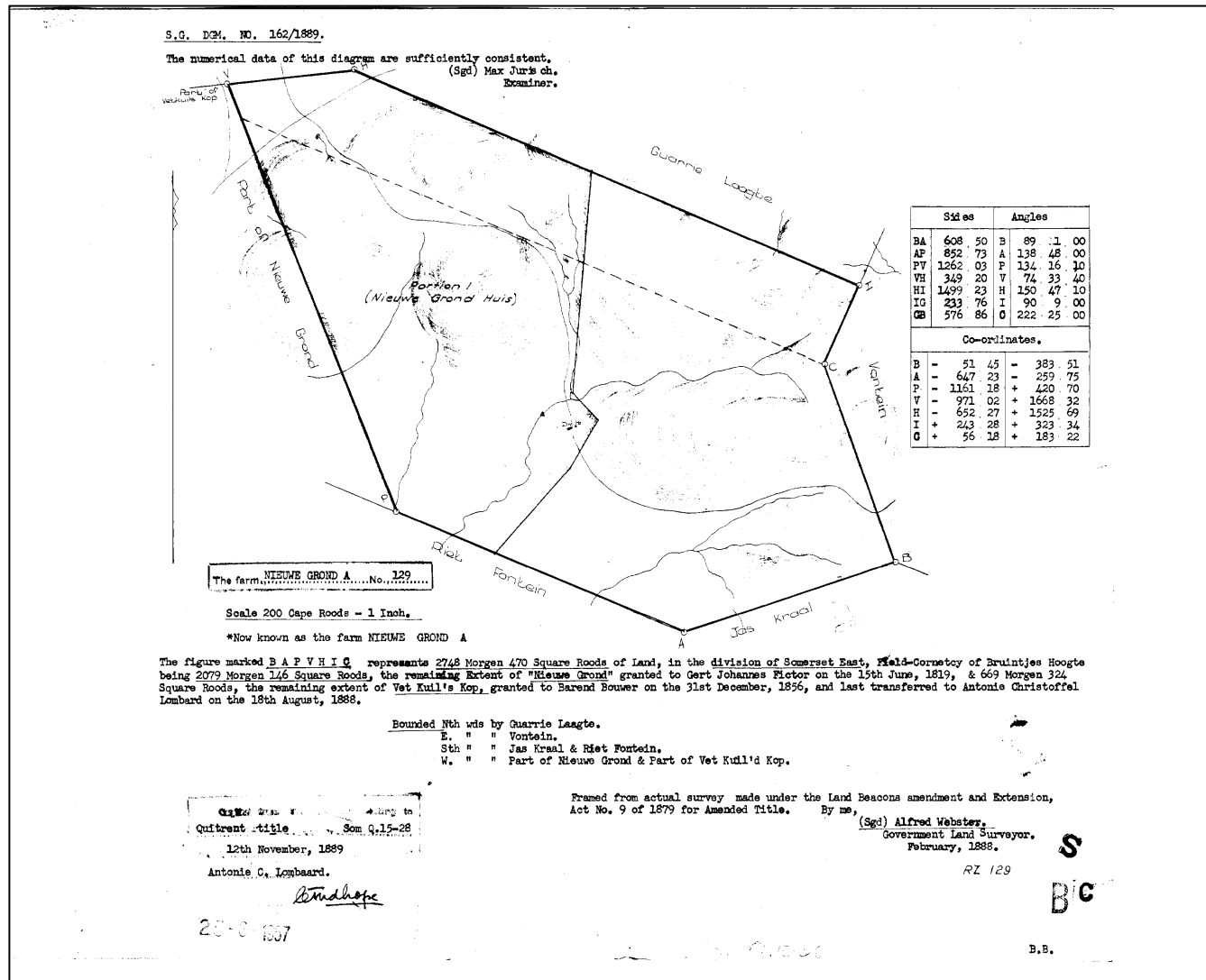


Figure 19 – SG-Diagram from the Chief Surveyor-General database for Farm Nieuwe Grond 129 surveyed by the Government Land Surveyor Alfred Webster in February 1888

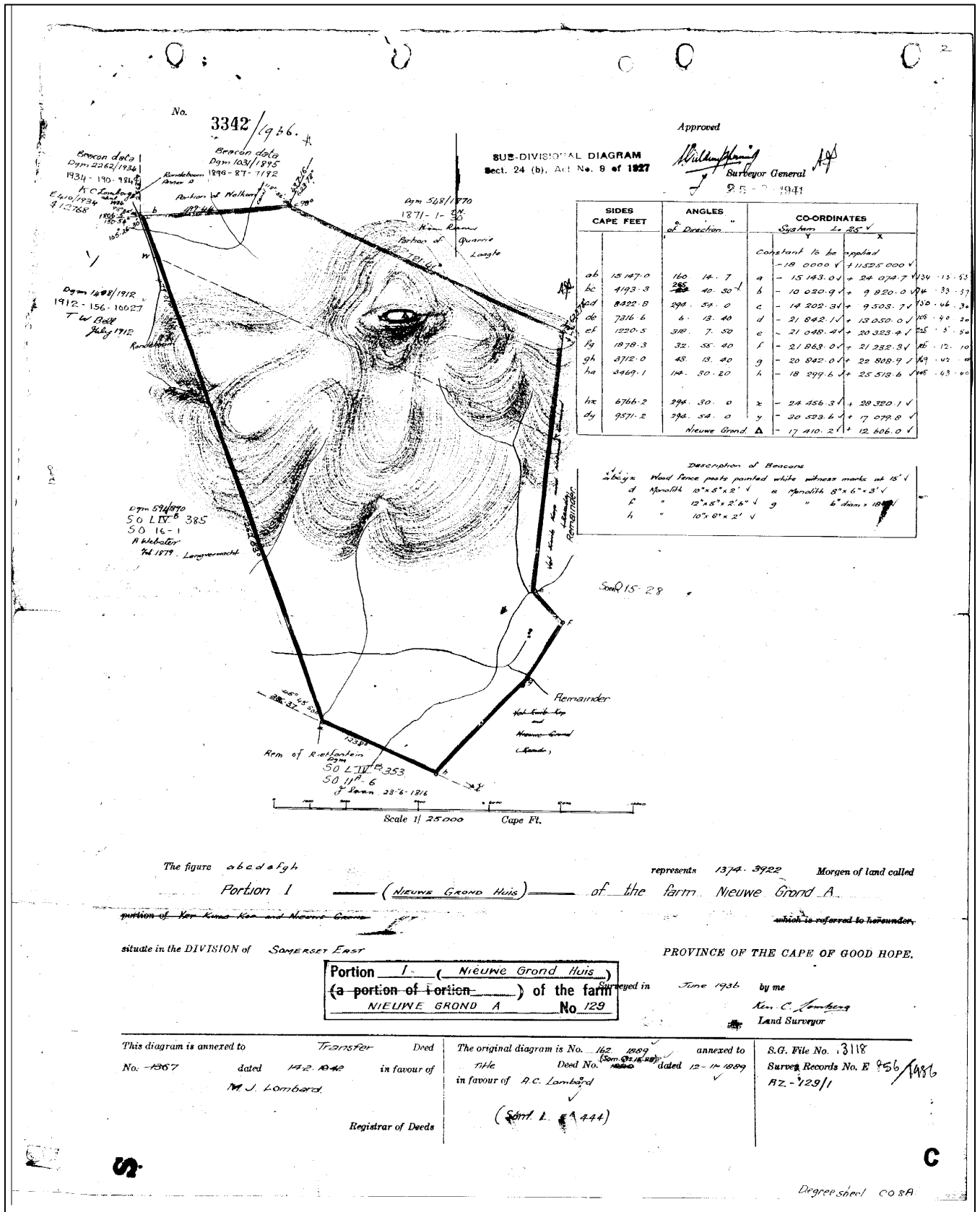


Figure 20 – SG-Diagram from the Chief Surveyor-General database for Farm Nieuwe Grand 129, Portion 1 surveyed by the Land Surveyor Kim. C. Lomborg in June 1936

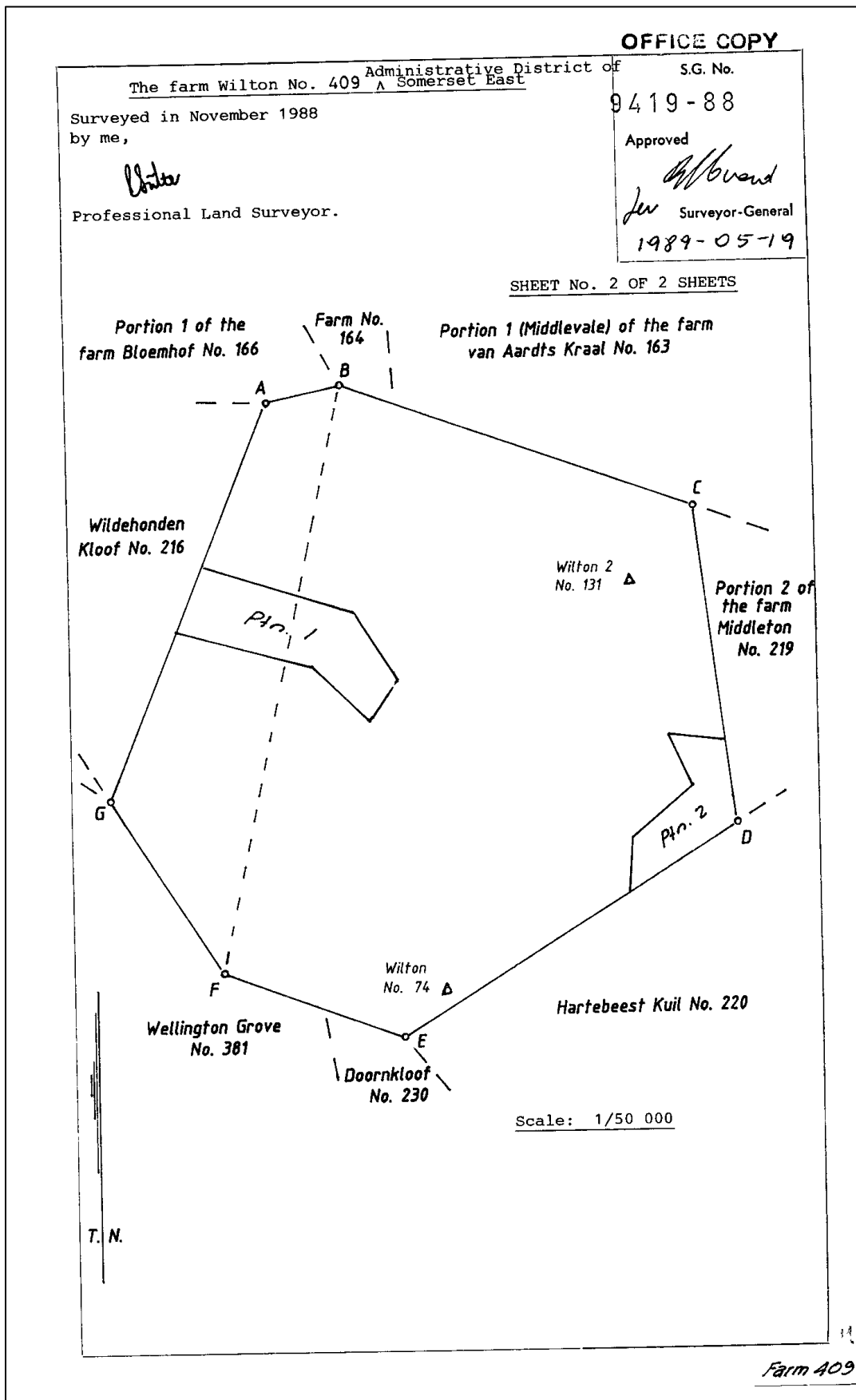


Figure 21 – SG-Diagram from the Chief Surveyor-General database for Farm Wilton 409 surveyed in November 1988.

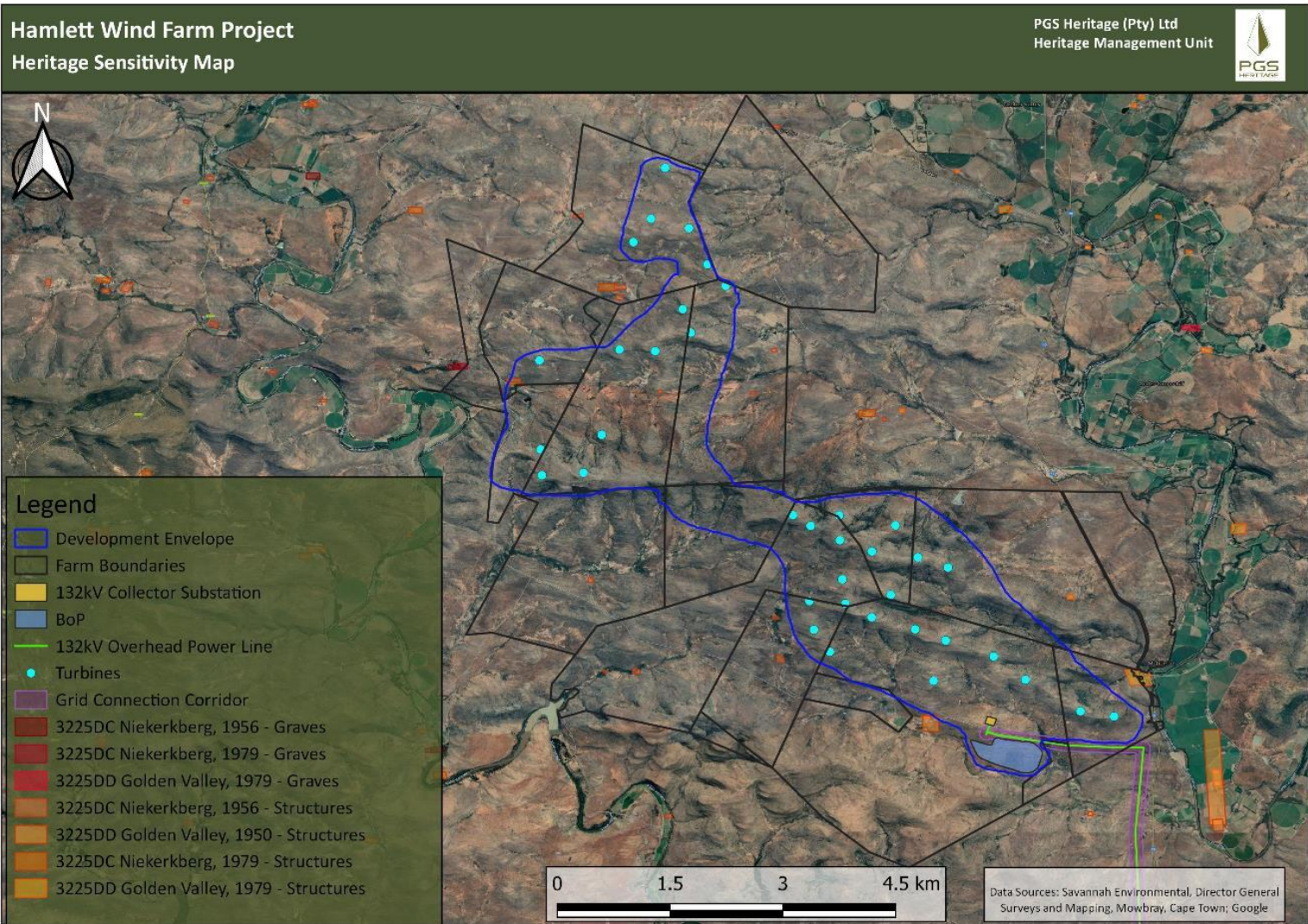


Figure 22 – Heritage sensitivity map indicating possible sensitive areas around and within Hamlett Wind Farm project area

5.4 Palaeontological background

The geology of the proposed Western Block Wind Farms is indicated on the 1: 250 000 3224 Graaff-Reinet (1993) and 3324 Port Elizabeth (1990) Geological Maps (**Figure 23**).

The Western Block of the Renewable Energy Wind Farms (Figure 9-15) is underlain by the:

- Dwyka Group
- Collingham Formation, Whitehill Formation, Prince Albert Formation, Rippon Formation, Fort Brown Formation (Ecca Group, Karoo Supergroup),
- Koonap Formation, Middleton Formation and Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup),
- Dolerite

5.4.1 *Dwyka Group*

The Permo-Carboniferous Dwyka Group is the oldest deposit in the Karoo Supergroup and spans the Late Carboniferous to Early Permian. The Dwyka Group overlies the glaciated Precambrian bedrocks in the north and unconformably and paraconformably the Cape Supergroup in the south. In the east, it overlies the Natal Group and Msikaba Formation unconformably. Glacial pavements underlying the Dwyka Group has well-developed striations (specifically in the north) (Johnson et al, 2006). The Dwyka Group is believed to be deposited in a marine basin (Visser, 1989). South Africa was covered by an ice sheet during the Dwyka. These deposits were thus deposited in a cold, glacially dominated environment. This Group consists mainly of gravelly sediments with mudstones with scraped and faceted pebbles and subordinate varved shales. Dark grey tillite was deposited by retreating glaciers (Visser et al, 1987) and thus the Dwyka is known for its rich assemblage of dropstones of various sizes.

The Permo-Carboniferous Dwyka Group is known for its trackways (trace fossils) that was formed by fish and arthropods, while fossilized faeces have also been recovered. Body fossils consist of gastropods, invertebrates and marine fish. Fossil plants from this group include a rich diversity of conifers, cordaitaleans, glossopterids, ginkgoaleans, horsetails, lycopods, pollens and spores ferns (Almond and Pether, 2008).

5.4.2 *The Ecca Group*

Ecca Group consists of the following Formations (from youngest to oldest Formation):

- The **Prince Albert Formation** is confined to the south-western half of the Karoo Basin. The northern facies are characterised by the predominance of greyish to olive-green, micaceous shale and grey, silty shale, as well as a pronounced transition from the underlying glacial deposits. Dark-grey to black carbonaceous shale and fine- to medium-grained feldspathic arenite and wacke are also present. The southern facies is characterised by the

predominance of dark-grey, pyrite-bearing, splintery shale, siltstone and the presence of dark-coloured chert and phosphatic nodules and lenses.

- The mudrocks of the **Whitehill Formation** consist of shale that is very thinly laminated and contains up to 14% carbonaceous material. The Whitehill Formation loses its distinctive lithological character towards the northeast with its lower part containing siltstone and very fine-grained sandstone.
- Outcrops of the **Collingham Formation** are confined to the southern and western margins of the Main Karoo Basin. The formation is generally between 30 and 70m thick and comprises a rhythmic alternation of thin, continuous beds (average 5cm) of hard, dark grey, siliceous mudrocks and very thin beds (average 2cm) of softer yellowish tuff (K-bentonite). In the western part of the area, minor sandstone and siltstone units occur in the upper half of the formation, while the distinctive Matjiesfontein Chert Bed (0.2-0.6m thick) is present in the lower half.
- The **Ripon Formation** consists of poorly sorted, fine- to very fine-grained lithofeldspathic sandstone alternating with dark grey clastic rhythmite and mudrock.
- The **Fort Brown Formation** consists of rhythmite and mudrock with minor sandstone intercalations and displays an overall coarsening-upward tendency. At certain localities, one or more fairly prominent sandstone units occur some distance below the upper contact. Individual sand/silt and silt/clay layers comprising rhythmite units of similar thickness, ranging from a few millimetres to a few centimetres, are laterally persistent.

The fossil assemblage of the **Ecca Group** is trace fossils. This trace fossil assemblage of the non-marine Mermia Ichnofacies, is dominated by the ichnogenera Umfolozia (arthropod trackways) and Undichna (fish swimming trail) as well as mesosaurid reptiles, palaeoniscoid fish, small eocarid crustaceans, insects, trace fossils (king crab trackways, shark coprolites), palynomorphs (organic-walled spores and pollens), petrified wood (mainly of primitive gymnosperms, silicified or calcified), sparse vascular plant remains (Glossopteris leaves, lycopods etc).

5.4.3 *Adelaide Subgroup*

The proposed development is underlain by a series of Karoo sandstones, mudstones and shales, deposited under fluvial environments of the Adelaide Subgroup that forms part of the Beaufort Group. The Beaufort Group is the third of the main subdivisions of the Karoo Supergroup. The Beaufort group overlays the Ecca Group and consists essentially of sandstones and shales, deposited in the Karoo Basin from the Middle Permian to the early part of the Middle Triassic periods and was deposited on land through alluvial processes. The Beaufort Group covers a total land surface area of approximately 200 000 km² in South Africa and is the first fully continental sequence in the Karoo Supergroup, and is divided into the Adelaide subgroup and the overlying Tarkastad subgroup. The Adelaide subgroup rocks are deposited under a humid climate that

allowed for the establishment of wet floodplains with high water tables and are interpreted to be fluvio-lacustrine sediments.

In the south-eastern portion of the Karoo Basin, the Adelaide Subgroup consists of the Koonap, Middleton and Balfour Formations. West of 24° the Adelaide Subgroup is represented by the Abrahamskraal and Teekloof Formations and in the north the Group is represented by the Normandien Formation. The Adelaide Subgroup is approximately 5 000 m thick in the southeast, but this decreases to about 800m in the centre of the basin which decreases to about 100 to 200m in the north. The Koonap Formation is about 1 300 m, Middleton 1 600 m and the Balfour Formation approximately 200 m thick. The Abrahamskraal Formation is about 2 500 m thick and the Teekloof Formation 1 000 m. The Normandien Formation is only about 320 m thick.

The Adelaide Subgroup contains alternating greyish-red, bluish-grey, or greenish-grey mudrocks in the southern and central parts of the Karoo Basin with very fine to medium-grained, grey lithofeldspathic sandstones. In the northern Normandien formation the basin consists of coarse to very coarse sandstones and granulostones. Coarsening–upward cycles are present in the lower part of the Normandien Formation while the mudrocks and sandstone units usually form fining-upward cycles. These cycles are positioned on erosion surfaces which is overlain by a thin intraformational mud-pellet conglomerate and vary in thickness from a few meters to tens of meters. Singular sandstone units could vary from 6m to 60m in the south thinning northwards but thick sandstone units are also present in the northern Normandien Formation.

Thicker sandstones of the Adelaide are usually multi-storey and usually have cut-and-fill features. The sandstones are characterized internally by horizontal lamination together with parting lineation and less frequent trough cross-bedding as well as current ripple lamination. The bases of the sandstone units are extensive beds, while ripple lamination is usually confined to thin sandstones towards the top of the thicker units.

The mudrocks of the Adelaide Subgroup usually have massive and blocky weathering apart from in the Normandien and Daggaboersnek Member. Sometimes desiccation cracks and impressions of raindrops are present. In the mudstones of the Beaufort Group calcareous nodules and concretions occur throughout.

The Lower Adelaide Subgroup consists of the following formations:

Koonap Formation: Transitional brackish lacustrine to fluvial. Greenish-grey sandstones grading upwards into fine-grained siltstones and mudstones.

Middleton Formation: Semi-arid climate supported a lush flora and fauna that thrived along meander belts and semi-permanent lakes. Cyclic deposits of lenticular sandstone bodies grading into greenish-grey mudstone. The thickest formation in this succession, constituting 37% of the Beaufort Group and 47% of the Adelaide Subgroup. The formation has lenses of red mudstone

which are likely to have been deposited in a sub-aerial fluvial environment. The Middleton Formation is known for its *Glossopteris* fossils plant assemblages. At their peak development during the Permian these plants inhabited a diversity of ecological niches, which includes riverine forests which were dominated by conifers, cycadeoids and ginkos. Diverse assemblages of insects are also recorded from this Formation. This Formation is represented by a rich assemblage of vertebrates found in the *Priesterognathus*, *Tropidostoma* and *Cistecephalus* Assemblage Zones of the Karoo Basin, (Rubidge et al, 1995; MacRae, 1999; McCarthy and Rubidge, 2005). The *Eodicynodon* and *Tapinocephalus* Assemblage Zones are present in the Kroonap Formation. The *Eodicynodon* AZ is characterised by *Eodicynodon* and *Tapinocaninus* fossils. The *Tapinocephalus* AZ has a rich diversity of Therapids, dinocephalia, while fish, amphibia and plant fossils are also present.

Balfour Formation: The upper part of the Adelaide Subgroup and part of what was called lower to middle Beaufort. The Balfour Formation has an abundant assemblage of vertebrates. Fossils of the Balfour Formation includes vertebrates from the *Daptocephalus* and *Lystrosaurus* Assemblage Zones (AZ) (Rubidge et al, 1995; MacRae, 1999; McCarthy and Rubidge, 2005; Johnson et al, 2009). Several important trace fossil assemblages, comprising vertebrate tracks and casts of vertebrate burrows have also been described from this Formation (Groenewald, 1996; Johnson et al., 2009).

5.4.4 Karoo Dolerite Suite

The Karoo Dolerite Suite is a volcanic suite which consists of igneous rocks and is thus unfossiliferous. This Suite was formed approximately 183 million years ago in the Early Jurassic. It is characterised by a superficial feeder system to the flood basalt eruptions and is best developed in the Karoo Basin. Flood basalts usually do not form noticeable volcanic structures but with a succession of eruptions form a suite of fissures of sub-horizontal lava flows that may vary in thickness from a couple of meters to thousands of meters. The Karoo Dolerite Suite is a widespread system of igneous bodies (dykes, sills) that encroached into the sediments of the Main Karoo Basin. Karoo lavas preserved today are erosional remnants of a more extensive lava cap that covered much of southern Africa.

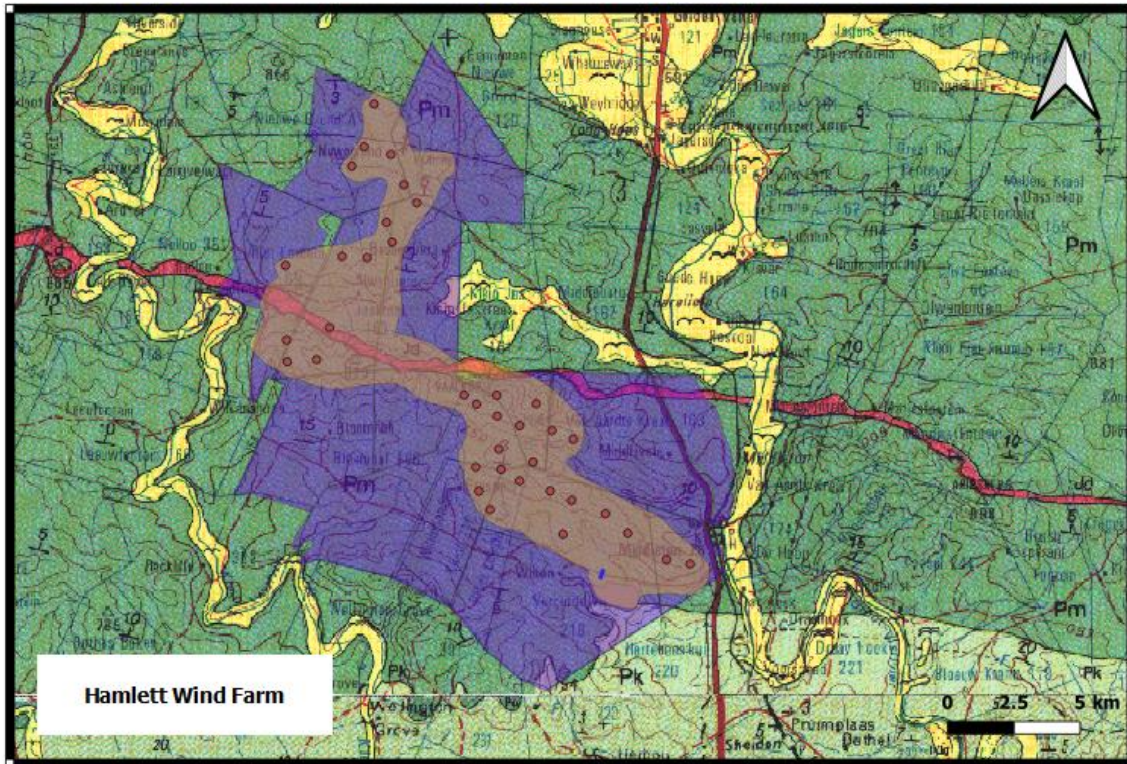


Figure 23 - Extract of the 1:250 000 3324 Port Elizabeth Geological Map (Council of Geosciences [Pretoria]) indicating the Western Block (Hamlett) Wind Farms (Butler, 2021).

5.5 Cultural and Living Heritage Background

The creation of the Cookhouse REDZ, and the ensuing applications for WEFs in this area has resulted in several HIAs having been compiled for the region since 2009/2010. All these reports have addressed the region's archaeological and palaeontological heritage.

5.5.1 Archaeological Resources

Archaeological stone age and iron age material are very sparse in the region. Several graded heritage sites of high local heritage significance have been identified in and around Cookhouse and Makhanda (Grahamstown), including palaeontological sites and rock art.

5.5.2 Historical Resources

The Cultural Landscape of the area between and surrounding Makhanda (Grahamstown) and Somerset East is sparsely populated with several farmsteads and their associated structures located on the valley floors of this hilly and mountainous region. The farmsteads are connected through several farm roads and old historic ox-wagon routes that link the local communities to the busy towns of Makhanda (Grahamstown) and Somerset East. The area proposed for the Hamlett Wind Farm has a low to high heritage significance. Many of the old farm buildings, stone houses and Churches in the area contain architectural elements that are older than 60 years and fall with the general protection of the NHRA (25 of 1999).

Historically the region surrounding Makhanda (Grahamstown) and Somerset East has been occupied by pre-colonial farmers and herders as well as European settlers since the 1750s (Booth, 2013). Several structures, including forts, signalling towers, monuments and memorials found in this area, provide further evidence of the conflicts and wars fought between the British and Xhosa who occupied the region. The town of Grahamstown (now known as Makhanda) was established as a result of the frontier wars of 1812 (Marchsal, 2008). The Fish river that is located to the east of Grahamstown (Makhanda) was historically the border between the Xhosa and the British (Booth, 2013).

This cultural significance of the area comprises of both tangible and intangible heritage. According to SAHRIS there are seventy (70) declared Provincial Heritage sites located around Makhanda (Grahamstown), consisting of historical structures and burial grounds, one (1) declared Provincial heritage site is located in Riebeeck East consisting of the Mooimeisiesfontein Farm, the well-known farm of Piet Retief, and fifteen (15) declared sites around Somerset East consisting of historical structures and buildings. Several graded heritage sites of high local heritage significance have also been identified in and around Cookhouse and Makhanda (Grahamstown). These sites include burial grounds and graves, monuments and memorials, stonewalling, as well as historical structures. These structures speak to the living heritage that is widespread on this cultural landscape. In terms of the tangible heritage, several historical structures (including old churches, farmsteads and stone houses) and burial grounds have been identified in the area.

5.6 Previous Archaeological and Heritage Studies in and around the Study Area

A scan of the SAHRIS database has revealed the following studies conducted in and around the study area of this report. These studies are summarised below in ascending date order:

- WEBLEY, L & WAY-JONES, M. F. 2007. Phase 1 heritage impact assessment on erven 1,44,7586 and 4979, Rhodes University, Grahamstown, Eastern Cape. Prepared for Rhodes University. **No archaeological material was observed.**
- NEL, J. & DE KAMPER, G. 2008. Heritage resources scoping survey & preliminary assessment Transnet Freight Line EIA, Eastern Cape and Northern Cape. Prepared for Environmental Resource Management in Southern Africa. **Sixty-five sites, including fossils, Early, Middle and Late Stone Age, Historical sites and structures and graves were observed during the survey.**
- VAN SCHALKWYK, L. 2008. Heritage impact assessment of four borrow pits, Ndlambe and Makana Municipalities, Greater Cacadu Region, Eastern Cape Province, South Africa. Prepared for BKS (Pty) Ltd. **No heritage resources were identified within any of the proposed development areas.**

- ANDERSON, G. 2009. Heritage survey of the proposed Waainek Wind Farm, Grahamstown, Eastern Cape. Prepared for Coastal and Environmental Services. **No heritage sites were identified in the affected area.**
- BINNEMAN, J. AND BOOTH, C. 2009. A Phase 1 archaeological heritage impact assessment for the proposed subdivision and rezoning of Erf 8517, Grahamstown, Makana Municipality, Cacadu District Municipality, for the purposes of constructing residential and town housing, and business centre. Prepared for Conservation Support Services. **The area is of low cultural sensitivity. No archaeological sites were found.**
- GAIGHER, S. 2010. Heritage Impact Assessment for the Proposed Upgrading of the Storm Water Drainage Network for the Town of Somerset East, Eastern Cape Province. **Only one area containing an informal cemetery was identified.**
- HALKETT, D. & WEBLEY, L. 2010. Heritage Scoping Assessment of a proposed Wind Energy Facility to be situated on farms in the Cookhouse District, Eastern Cape. Prepared for Savannah Environmental (Pty). **No heritage sites or features were identified.**
- HALKETT, D. & WEBLEY, L. & ORTON, J.& PINTO, H. 2010. Heritage impact assessment of the propose Amakhala-Emoyeni wind energy facility, Cookhouse District, Eastern Cape. Prepared for Savannah Environmental (Pty). **Historical features, buildings and graveyards associated with farms are present within the study area.**
- BOOTH, C. 2011A. A Phase 1 Archaeological Impact Assessment for the proposed Cookhouse li Wind Energy Facility, Blue Crane Route Local Municipality, Eastern Cape Province. Prepared for Savannah Environmental (Pty). **Isolated surface scatters of predominantly MSA stone artefacts, a LSA site, and some historical ceramics were observed.**
- BOOTH, C. 2011B. Phase 1 archaeological impact assessment for the Golf Course Development On Portions 1 and 2 of the Farm Willow Glen and Portion 6 of Belmont Farm, Grahamstown, Makana Municipality, Cacadu District Municipality, Eastern Cape Province. Prepared for Coastal and Environmental Services. **No archaeological heritage material remains or sites were found.**
- NILSSEN, P. 2011. Proposed development of the Plan 8 Grahamstown Wind Energy Project: including Farms Gilead 361, Peynes Kraal 362 and Tower Hill 363, Grahamstown, Makana Municipality, Eastern Cape Province. Prepared for Coastal & Environmental Services. **Two unmarked graves, a cave with rock art, stone age artefacts and an old horse/oxen-drawn plough were observed in the area.**
- VAN SCHALKWYK, J. 2011. Heritage impact assessment for the proposed Eskom 400kv Electricity Transmission Line, Neptune To Poseidon Substations, East London To Cookhouse, Eastern Cape. **Several stone and iron age sites were identified.**
- VAN RYNEVELD, K. 2011. Cultural heritage impact assessment upgrade of the National Route 10 Section 3(N10/3) from Bavians River to Rietvlei (Vrischgewaagd), between Cookhouse and Cradock, Eastern Cape, South Africa. Prepared for MPM Environmental

Consultants. **No Stone Age or Iron Age sites were identified, while 2 Colonial structures and a grave was found.**

- BINNEMAN, J. 2013. An archaeological walkthrough survey of the turbine footprint for the proposed Phase 1 Amakhala Emoyeni Wind Energy Facility, Cookhouse District, Blue Crane Route Municipality, Eastern Cape Province. **The study area investigated appears to be of low archaeological and historical sensitivity.**
- BINNEMAN, J. 2013. A Phase 1 Archaeological Impact Assessment of the proposed new substation and 132kv power line and the Nojoli Wind Farm near Cookhouse, Blue Crane Route Local Municipality, Cacadu District, Eastern Cape Province. Prepared for Savannah Environmental (Pty) Ltd. **The study area investigated appears to be of low archaeological and historical sensitivity.**
- BINNEMAN, J. 2014. An archaeological walkthrough survey of the final layout of the proposed Nojoli Wind Energy Facility near Cookhouse, Blue Crane Route Local Municipality, Bedford District, Eastern Cape Province. Prepared for Savannah Environmental (Pty) Ltd. **The study area investigated appears to be of low archaeological and historical sensitivity.**
- BINNEMAN, & REICHERT, K. 2015. An archaeological walkthrough survey of the final optimised layout of the authorised Nxuba Wind Farm near Cookhouse, Blue Crane Route Local Municipality, Sarah Baartman District Municipality, Eastern Cape Province. Prepared for Savannah Environmental (Pty) Ltd. **Only a few isolated weathered Middle Stone Age stone tools of low heritage significance were observed.**
- VAN RYNEVELD, K. 2016. Phase 1 Archaeological & Cultural Heritage Impact Assessment – Proposed Hempel Quarry, Crusher and Stockpile Area, Farm No 604, near Grahamstown, Makana Local Municipality, Eastern Cape. Prepared for Terreco Environmental. **No archaeological or cultural heritage was identified.**
- SMUTS, K. & LAVIN, J. 2017. Heritage impact assessment for the proposed Spitskop Wef 132kv Power Lines. Prepared for Terramanzi Group (Pty) Ltd. **Six MSA artefacts were found**

5.7 Findings of the historical desktop study

The findings can be compiled as follows and have been combined to produce a heritage sensitivity map for the project based on the desktop assessment (Error! Reference source not found.).

5.7.1 *Heritage Sensitivity*

The sensitivity maps were produced by overlying:

- Satellite Imagery;
- Current Topographical Maps; and
- First to third edition Topographical Maps dating from the 1940's to 1970s.

This enabled the identification of possible heritage sensitive areas that included:

- Dwellings;
- Clusters of dwellings (homesteads, huts and farmsteads);
- Archaeological Sensitive areas; and
- Structures/Buildings.

By superimposition and analysis, it was possible to rate these structure/areas according to age and thus their level of protection under the NHRA. Note that these structures refer to possible tangible heritage sites as listed in **Table 4**.

Table 4 -Tangible heritage sites in the study area

Name	Description	Legislative protection
Archaeology - Iron Age Sites	Older than 100 years	NHRA Sect 3 and 35
Architectural Structures	Possibly older than 60 years	NHRA Sect 3 and 34
Graves and Burial Grounds	60 years or older	NHRA Sect 3 and 36

Additionally, evaluation of satellite imagery has indicated the following areas that may be sensitive from a heritage perspective. The analysis of the studies conducted in the area assisted in the development of the following landform type to heritage find matrix in

Table 5.

Table 5 - Landform type to heritage find matrix

LANDFORM TYPE	HERITAGE TYPE
Crest and foot hill	LSA and MSA scatters, LIA settlements
Crest of small hills	Small LSA sites – scatters of stone artefacts, ostrich eggshell, pottery and beads
Watering holes/pans/rivers	LSA sites, LIA settlements
Farmsteads	Historical archaeological material
Ridges and drainage lines	LSA sites, LIA settlements
Forested areas	LIA sites

6 FIELDWORK AND FINDINGS

A controlled surface survey was conducted on foot and by a vehicle by a heritage specialist and student intern from PGS. The fieldwork component of the study was aimed at identifying tangible remains of archaeological, historical and heritage significance. The fieldwork was undertaken by way of walkthroughs of the study area. The fieldwork was conducted over several days on 23 March 2020 as well as from 8 to 13 June 2020. The tracklogs (in yellow) for the survey are indicated in **Figure 24**.

During the survey, fourteen (14) heritage sites were identified. Of these 14 sites, ten (10) sites (**WWF1-01** to **WWF1-10**) consist of structures (Farmhouses, Labourer houses, farm sheds and kraals), and four (4) sites contain graves (**WWF1-11** to **WWF1-14**).

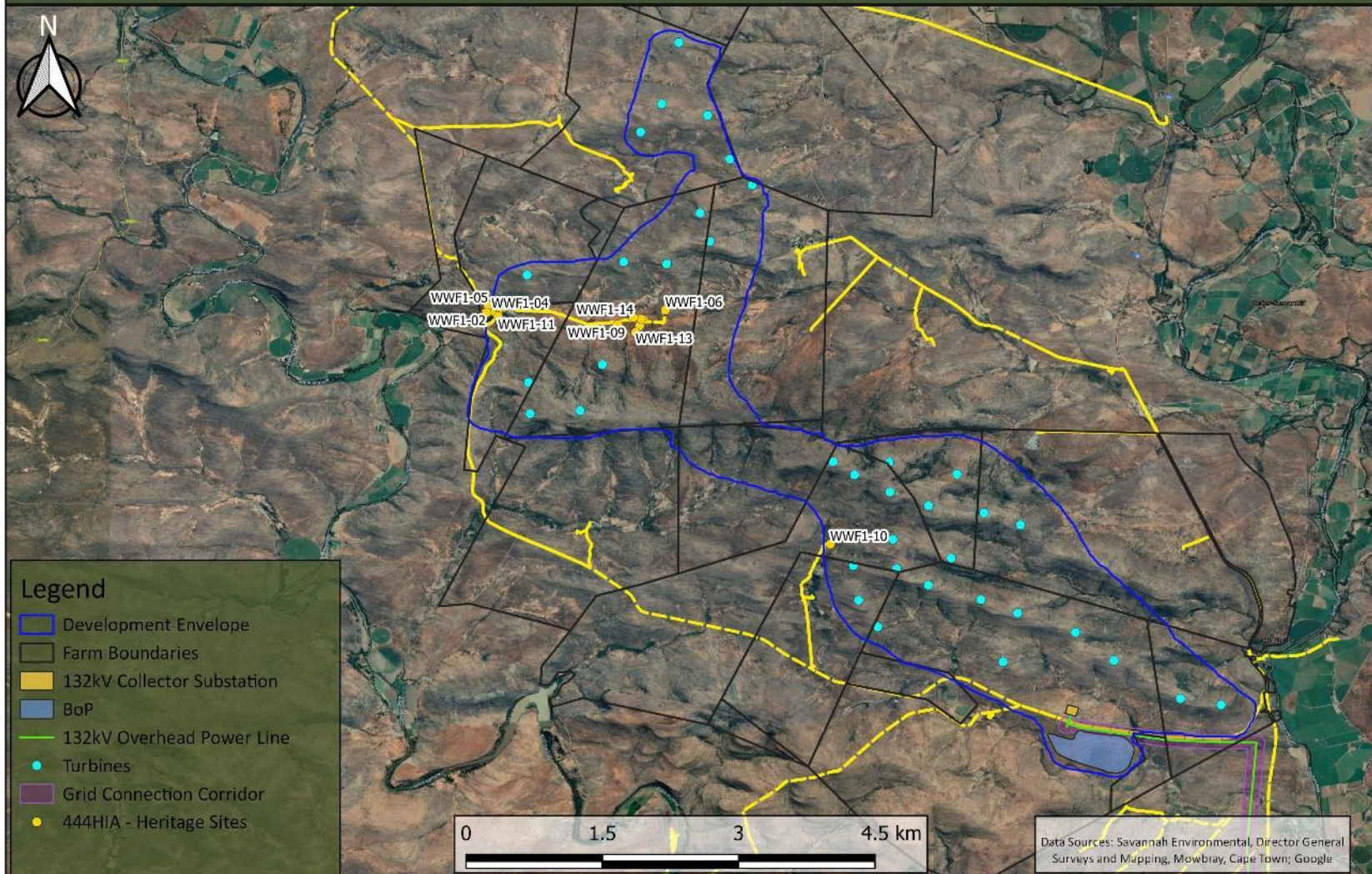







Figure 24 – Locality of the heritage resource in the study area


Table 6 - Sites identified during the heritage survey

Site ¹ number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-01	32°53'5.57"S	25°39'44.35"E E	<p>Several labourer houses were found on the Farm Rietfontein 159.</p> <ul style="list-style-type: none"> • WWF1-01a: A small stone house was identified. The windows appear to be missing. The house appears to have a corrugated roof. • WWF1-01b: A stone cattle kraal was found 180m north of the house (WWF1-01a). The upper sections of the dry stone packed walls have collapsed. The kraal is approximately 32m x 28m in extent. • WWF1-01c: Second stone labourer house. A second stone cattle kraal was found 30m west of the house. The foundations of the house are made from stone, while the rest of the walls appears to be made from cement. • WWF1-01d: Third Stone labourer house. The house consists of two sections. The first is an older stone structure, while the second appears to be a newer cement addition. A second stone cattle kraal was found 35m west of the house. • WWF1-01e: Cattle kraal, with collapsed stone packed walls. <p>Aerial Photograph (230_005_00446) dating 1949 from the CDNGI Geospatial Portal (http://www.cdngiportal.co.za/cdngiportal/) shows the several smaller buildings (labour cottages) at the location of WWF1-01. This is the oldest Aerial Photograph of the main farmhouse that is available. Note the road to access the farm Bloemhof from the N10, pass by the labourer houses.</p> <p>From the architecture and building materials, it is suggested that these stone houses are older than 60 years. The structures represent examples of local historical architecture and are of heritage significance. The site is provisionally rated as IIC with low heritage significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • A 30m No-Go-Buffer-Zone is recommended for WWF1-01. 	Low	IIC




¹ Site in this context refers to a place where a heritage resource is located and not a proclaimed heritage site as contemplated under s27 of the NHRA.

Site ¹ number	Lat	Lon	Description	Heritage Significance	Heritage Rating
			<ul style="list-style-type: none"> • If development occurs within 30m of WWF1-01, the site needs to be satisfactorily studied and recorded before impact. • Recording of the buildings i.e. (a) map indicating the position and footprint of all the buildings and structures (b) photographic recording of all the buildings and structures (c) measured drawings of the floor plans of the principal buildings. 		
 <p data-bbox="210 922 1115 951"><i>Figure 25 - View of the labourer house (WWF1-01a) found at site WWF1-01.</i></p>			 <p data-bbox="1223 922 1984 951"><i>Figure 26 - View of the kraal found near the house (WWF1-01b).</i></p>		

Site ¹ number	Lat	Lon	Description	Heritage Significance	Heritage Rating
			 <p data-bbox="210 730 1115 791">Figure 27 - Second stone labourer house (WWF1-01c). The scale is in 10cm increments.</p>		
			 <p data-bbox="1167 730 2049 791">Figure 28 - Third stone labourer house (WWF1-01d). The scale is in 10cm increments.</p>		
			 <p data-bbox="669 1316 1597 1345">Figure 29 - Second cattle kraal (WWF1-01e). The scale is in 10cm increments.</p>		

Site ¹ number	Lat	Lon	Description	Heritage Significance	Heritage Rating
					
<p>Figure 30 - Section of the 1949 photograph (230_005_00446) showing the labourer cottages (yellow circle). Note the informal farm road to access the farm Bloemhof from the N10, pass by the labourer houses.</p>					

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-02	32°53'6.38"S	25°39'35.60"E	<p>A stone labourer house was found on the Farm Rietfontein 159. The roof and walls of the structure have collapsed. The structure consists of dry stone packed walling. As dry stone packed cattle kraal was located 50m north of the house. The type of method used to build the kraal is similar to the method used in the construction of the stone house. As such it is suggested that the stone house and kraal was built during the same period.</p> <p>From the architecture and building materials, it is suggested that these stone houses are older than 60 years. The structures represent examples of local historical architecture and are of heritage significance. The site is provisionally rated as IIIC with low heritage significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • Although WWF1-02 falls 15m outside of the development Footprint, the significance of the site suggests that a 30m No-Go-Buffer-Zone be recommended for WWF1-02. • If development occurs within 30m of WWF1-02, the site needs to be satisfactorily studied and recorded before impact. Recording of the buildings i.e. (a) map indicating the position and footprint of all the buildings and structures (b) photographic recording of all the buildings and structures (c) measured drawings of the floor plans of the principal buildings. 	Low	IIIC

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
			 <p data-bbox="248 687 1070 715"><i>Figure 31 - View of the stone house. The scale is in 10cm increments.</i></p>		
			 <p data-bbox="1173 671 2033 730"><i>Figure 32 - View of the collapsed wall of the house. The scale is in 10cm increments.</i></p>		
			 <p data-bbox="689 1257 1570 1284"><i>Figure 33 - View of the stone cattle kraal. The scale is in 10cm increments.</i></p>		

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-03	32°53'4.76"S	25°39'38.12"E	<p>A stone kraal was found on the Farm Rietfontein 159. The walls of the structures have collapsed. The kraal consists of dry stone packed walling, made with large and medium-sized rocks. The walls are approximately 1m thick. The kraal is approximately 30m x 20m in extent.</p> <p>The site is provisionally rated as NCW as it has no research potential or is it of other cultural significance. Furthermore, the site falls outside of the proposed development footprint.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> No mitigation is required 	NCW	No research potential or other cultural significance





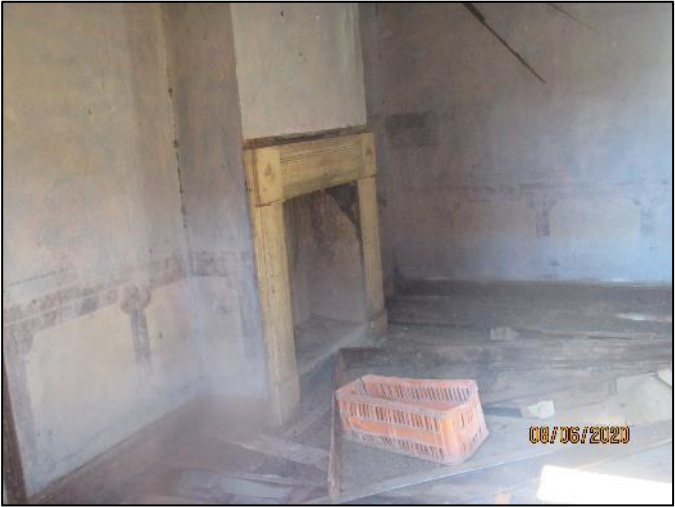

Figure 34 - The collapsed wall of the stone cattle kraal at site WWF1-03. The scale is in 10cm increments.

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-04	32°53'5.29"S	25°39'39.83"E	<p>A stone kraal was found on the Farm Rietfontein 159. The structures have collapsed. The kraal consists of dry stone packed walling, made with large and medium-sized rocks. The walls are approximately 0.9m thick.</p> <p>The site is provisionally rated as NCW as it has no research potential or is it of other cultural significance. Furthermore, the site falls outside of the proposed development footprint.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> No mitigation is required 	NCW	No research potential or other cultural significance





Figure 35 - The collapsed wall of the stone cattle kraal at site WWF1-04. The scale is in 10cm increments.

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-05	32°53'0.68"S	25°39'36.77"E	<p>Several structures were identified.</p> <ul style="list-style-type: none"> • WWF1-05a: An old stone farmhouse and shed were found on the Rietfontein 159. The structures have collapsed. The main house consists of an old stone structure with a modern brick addition. According to the landowner, the farmhouse belonged to the De Klerk family who originally owned the farm. Several of the internal furnishings, including the windows and floor, have been damaged. • WWF1-05b: A second house, with a corrugated iron roof, is located west of the original farmhouse. A stone packed wall connects the main farmhouse with the second house. <p>Aerial Photograph (230_005_00446) dating 1949 from the CDNGI Geospatial Portal (http://www.cdngiportal.co.za/cdngiportal/) shows the several smaller buildings (labour cottages) at the location of WWF1-05. This is the oldest Aerial Photograph of the main farmhouse that is available. Note the road to access the farm Bloemhof from the N10, pass by the farm houses.</p> <p>From the architecture and building materials, it is suggested that these stone houses are older than 60 years. The structures represent examples of local historical architecture and are of heritage significance. The site is provisionally rated as IIIC with low heritage significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • In terms of general conservation of the historical farmsteads, a 500m no-go-buffer-zone is recommended. However, considering the impact of the proposed development of the Hamlett WEF on the cultural landscape of these historical farmsteads, a 1000m no-go-buffer-zone (inclusive of the 500m no-go-buffer-zone) should be implemented. • If development occurs within 1000m the main homesteads/“werf” need to be satisfactorily studied and recorded before impact occurs. 	Low	IIIC

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
			<ul style="list-style-type: none"> Recording of the buildings i.e. (a) map indicating the position and footprint of all the buildings and structures (b) photographic recording of all the buildings and structures (c) measured drawings of the floor plans of the principal buildings. 		
			 <p data-bbox="208 799 1120 853">Figure 36 - View of the Western Facade of the Main Farmhouse. The scale is in 10cm increments</p>	 <p data-bbox="1167 810 2040 842">Figure 37 - View of the Northern Façade. The scale is in 10cm increments</p>	
					

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
			<p><i>Figure 38 - Inside of the house, where most of the floor has been damaged. The scale is in 10cm increments</i></p>		<p><i>Figure 39 - Shed found next to the house. The scale is in 10cm increments</i></p>



Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
					
			<p>Figure 40 - The second farmhouse found at site WWF1-05. The scale is in 10cm increments</p>		<p>Figure 41 - Stonepacked wall connecting the main house with the second house. The scale is in 10cm increments.</p>

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
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Figure 42 - Section of the 1949 photograph (230_005_00446) showing the two main farmhouses (yellow circle). Note the informal farm road to access the farm Bloemhof from the N10, pass by the labourer houses. The several labourer cottages and kraal (WWF1-01) is located to the east.

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-06	32°53'4.72"S	25°41'43.56"E	<p>Two labourer houses were found on the Farm Jaskraal 160. An upper grinding stone was also found near the two stone houses.</p> <ul style="list-style-type: none"> • WWF1-06a: A small stone house was identified. The house consist of dry stone packed walling. • WWF1-06b: Second Stone labourer house. The house consist of dry stone packed walling. The roof is missing and some of the walls have collapsed. <p>From the architecture and building materials, it is suggested that these stone houses are older than 60 years. The structures represent examples of local historical architecture and are of heritage significance. The site is provisionally rated as IIIC with low heritage significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • A 30m No-Go-Buffer-Zone be recommended for WWF1-06. • If development occurs within 30m of WWF1-06, the site needs to be satisfactorily studied and recorded before impact. • Recording of the buildings i.e. (a) map indicating the position and footprint of all the buildings and structures (b) photographic recording of all the buildings and structures (c) measured drawings of the floor plans of the principal buildings. 	Low	IIIC

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
			 <p data-bbox="656 675 1608 703"><i>Figure 43 - Stone labourer house (WWF1-06a). The scale is in 10cm increments.</i></p>  <p data-bbox="611 1166 1653 1195"><i>Figure 44 - Second stone labourer house (WWF1-06b). The scale is in 10cm increments.</i></p>		



Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
					

Figure 45 - Upper grinding stone found at site WWF1-06. The scale is in 10cm increments.

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-07	32°53'15.95"S	25°41'25.21"E	<p>A single labourer house was found on the Farm Jaskraal 160. The house consists of packed stones and a corrugated iron roof.</p> <p>From the architecture and building materials, it is suggested that these stone houses are older than 60 years. The structures represent examples of local historical architecture and are of heritage significance. The site is provisionally rated as IIIC with low heritage significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • A 30m No-Go-Buffer-Zone be recommended for WWF1-07. • If development occurs within 30m of WWF1-07, the site needs to be satisfactorily studied and recorded before impact. • Recording of the buildings i.e. (a) map indicating the position and footprint of all the buildings and structures (b) photographic recording of all the buildings and structures (c) measured drawings of the floor plans of the principal buildings. 	Low	IIIC
					
<p>Figure 46 - Labourers house found at site WWF1-07. The scale is in 10cm increments.</p>					

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-08	32°53'11.07"S	25°41'26.63"E	<p>A Farmstead was observed 150m north of WWF1-07. The site consists of:</p> <ul style="list-style-type: none"> • WWF1-08a: The main Farmhouse. The house consists of a corrugated iron roof. It has a storage silo located at the north-eastern corner of the house. • WWF1--8b: an old shed was found 60m south of the man house. The shed is used as a storage space for farming equipment. • WWF1--8c: Two labourer houses and a small reservoir was found 16m north of the main house. • WWF1-08d: A bigger farm shed was found. It is located 40m west of the main house. Several kraals are located next to the shed. • WWF1-08e: Storage silo found 60m north of the big shed. <p>A structure was identified on the Topographic map 3225DC Niekerkberg dating to 1979 at a location approximate to the location of the house at site WWF1-08a.</p> <p>Aerial Photograph (230_005_00446) dating 1949 from the CDNGI Geospatial Portal (http://www.cdngiportal.co.za/cdngiportal/) shows the several smaller buildings (labour cottages) at the location of WWF1-08. This is the oldest Aerial Photograph of the main farmhouse that is available. From the Aerial Photograph, only the main farmhouse (WWF1-08a) is visible, suggesting it is the oldest structure on the property.</p> <p>Although the structures are historically older than 60 years, and they represent examples of vernacular historical architecture, the site is considered of local heritage significance. The site is provisionally rated as IIIC with low heritage significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • In terms of general conservation of the historical farmsteads, a 500m no-go-buffer-zone is recommended. However, considering the impact of the proposed development of the 	Low	IIIC



Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
			<p>Hamlett WEF on the cultural landscape of these historical farmsteads, a 1000m no-go-buffer-zone (inclusive of the 500m no-go-buffer-zone) should be implemented.</p> <ul style="list-style-type: none"> • If development occurs within 1000m the main homesteads/“werf” need to be satisfactorily studied and recorded before impact occurs. • Recording of the buildings i.e. (a) map indicating the position and footprint of all the buildings and structures (b) photographic recording of all the buildings and structures (c) measured drawings of the floor plans of the principal buildings. 		
			 <p data-bbox="215 983 1111 1042"><i>Figure 47 - View of the main Farmhouse (WWF1-08a). The scale is in 10cm increments.</i></p>		 <p data-bbox="1144 983 2058 1042"><i>Figure 48 - View of storage silo connected to the house. The scale is in 10cm increments.</i></p>



Figure 49 - Old shed (WWF1-08b). The scale is in 10cm increments.



Figure 50 - Two labourer houses found near the house (WWF1-08c)



Figure 51 - Bigger farm shed found (WWF1-08d). The scale is in 10cm increments.



Figure 52 - Kraals found located next to the shed (WWF1-08d). The scale is in 10cm increments.



Figure 53 - Second storage silo identified (WWF1-08e).



Figure 54 - View of a structure (red polygon) found near site WWF1-08a on Topographic map 3225DC Niekerkberg, 1979.




Figure 55 - Section of the 1949 photograph (230_005_00446) showing the main farmhouse (WWF1-08a) (yellow circle locate at WWF1-08).



Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-09	32°53'15.02"S	25°41'9.70"E	<p>Two labourer houses were found on the Farm Jaskraal 160. The structures have collapsed in areas. The houses consist of brick and cement walling.</p> <p>As far as has been determined, the house does not have a special relationship between the community and the surrounding environment. Thus, the site is provisionally rated as NCW as it has no research potential or is it of other cultural significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> No mitigation is required 	NCW	No research potential or other cultural significance




Figure 56 - View of two labourer houses at site WWF1-09.



Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-10	32°55'51.28"S	25°43'41.07"E	<p>A shed with kraals was found on the Farm Vaalkop 164. The shed and kraals are used to store farming equipment as well as for goats and cattle.</p> <p>As far has been determined, the structure does not have a special relationship between the community and the surrounding environment. Thus, the site is provisionally rated as NCW as it has no research potential or is it of other cultural significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> No mitigation is required 	NCW	No research potential or other cultural significance
 <p>Figure 57 - View site WWF1-10.</p>					

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-11	32°53'9.03"S	25°39'44.52"E	<p>Approximately 30 graves were found on the Farm Rietfontein 159. The graves consist of packed stones. No formal headstones were identified. The graves are covered in grassy vegetation.</p> <p>A few of the graves do, however, have stones placed upright that are functioning as a grave marker. It is possible that the graves belong to the labourers who used to occupy the houses found at site WWF1-01.</p> <p>Burial grounds and graves are protected under Section 36 of the NHRA 25 of 1999. Thus, the site is provisionally rated as having a high heritage significance with a heritage rating of IIIA.</p> <p>All graves have high levels of emotional, religious and in some cases historical significance. It is also important to understand that the identified graves could have significant heritage value to the relevant families. The site is provisionally rated as IIIA with high heritage significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • The site should be demarcated with a 30-meter no-go-buffer zone and that the graves should be avoided and left in situ. • A Grave Management Plan should be developed for the graves, to be implemented during the construction and operation phases (which needs approval by ECPRA). • If the site is going to be impacted and the graves need to be removed a grave relocation process for site WWF1-11 is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with the SAHRA under the NHRA and National Health Act regulations. 	High	IIIA

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating	
						
<p><i>Figure 58 - General view of the graves found at site WWF1-11.</i></p>			<p><i>Figure 59 - View of a packed stone grave. The scale is in 10cm increments.</i></p>			

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
			 <p data-bbox="277 820 1048 895"><i>Figure 60 - View of an upright stone marker. The scale is in 10cm increments.</i></p>		

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-12	32°53'6.46"S	25°39'36.40"E	<p>Approximately 15 graves were found on the Farm Rietfontein 159. Some of the graves belong to the De Klerk family, while several other graves, consisting of packed stones, belong to unknown individuals. The graves are covered in grassy vegetation. The marked graves belong to the De Klerk family who used to occupy the house found at site WWF1-05.</p> <p>Burial grounds and graves are protected under Section 36 of the NHRA 25 of 1999. All graves have high levels of emotional, religious and in some cases historical significance. It is also important to understand that the identified graves could have significant heritage value to the relevant families. The site is provisionally rated as IIIA with high heritage significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • The site should be demarcated with a 30-meter no-go-buffer zone and that the graves should be avoided and left in situ. • A Grave Management Plan should be developed for the graves, to be implemented during the construction and operation phases (which needs approval by ECPRA). • If the site is going to be impacted and the graves need to be removed a grave relocation process for site WWF1-12 is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with the SAHRA under the NHRA and National Health Act regulations. 	High	IIIA

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
					
			<p data-bbox="338 676 987 715"><i>Figure 61 - View of the graves found at site WWF1-12.</i></p>		
				<p data-bbox="1173 676 2033 715"><i>Figure 62 - Graves with packed stones. The scale is in 10cm increments.</i></p>	









Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
					
					
					

Figure 63 - Grave with packed stones covered in vegetation. The scale is in 10cm increments.




Figure 64 - Headstone of grave contains an inscription that has faded. The scale is in 10cm increments.

Figure 65 - Grave that belongs to Catharina Wilhelmina Dolphina Bester (De Klerk). The scale is in 10cm increments.

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-13	32°53'20.70"S	25°41'22.43"E	<p>Approximately 15 graves were found on the Farm Jaskraal 160. The graves, consist of packed stones, belong to unknown individuals. The graves are covered in grassy vegetation. Some of the graves are not covered in packed stones but have two upright stones marking the grave. The graves most likely belong to the labourers who used to occupy the houses found at site WWF1-07.</p> <p>Burial grounds and graves are protected under Section 36 of the NHRA 25 of 1999. All graves have high levels of emotional, religious and in some cases historical significance. It is also important to understand that the identified graves could have significant heritage value to the relevant families. The site is provisionally rated as IIIA with high heritage significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • The site should be demarcated with a 30-meter no-go-buffer zone and that the graves should be avoided and left in situ. • A Grave Management Plan should be developed for the graves, to be implemented during the construction and operation phases (which needs approval by ECPRA). • If the site is going to be impacted and the graves need to be removed a grave relocation process for site WWF1-13 is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with the SAHRA under the NHRA and National Health Act regulations. 	High	IIIA

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
			 <p data-bbox="208 608 1117 667"><i>Figure 66 - View of a packed stone grave found on-site WWF1-13. The scale is in 10cm increments.</i></p>		
			 <p data-bbox="1196 596 2013 655"><i>Figure 67 - Grave covered in grassy vegetation. The scale is in 10cm increments.</i></p>		
					
					
			<p data-bbox="640 1287 1626 1313"><i>Figure 68 - Grave marked with two upright stones. The scale is in 10cm increments.</i></p>		

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
WWF1-14	32°53'9.93"S	25°41'20.80"E	<p>Approximately 6 graves were found on the Farm Jaskraal 160. The graves, consist of packed stones, belong to unknown individuals. The graves are covered in grassy vegetation and located in an agricultural field. Some of the graves also have two upright stones marking the grave. The graves most likely belong to the labourers who used to occupy the houses found at site WWF1-08.</p> <p>Burial grounds and graves are protected under Section 36 of the NHRA 25 of 1999. All graves have high levels of emotional, religious and in some cases historical significance. It is also important to understand that the identified graves could have significant heritage value to the relevant families. The site is provisionally rated as IIIA with high heritage significance.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> • The site should be demarcated with a 30-meter no-go-buffer zone and that the graves should be avoided and left in situ. • A Grave Management Plan should be developed for the graves, to be implemented during the construction and operation phases (which needs approval by ECPRA). <p>If the site is going to be impacted and the graves need to be removed a grave relocation process for site WWF1-14 is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with the SAHRA under the NHRA and National Health Act regulations.</p>	High	IIIA

Site number	Lat	Lon	Description	Heritage Significance	Heritage Rating
			 <p data-bbox="232 687 1088 719"><i>Figure 69 - General view of the graves. The scale is in 10cm increments.</i></p>		
			 <p data-bbox="210 1198 1115 1256"><i>Figure 71 - View of a packed stone grave found at WWF1-14. The scale is in 10cm increments.</i></p>		
				 <p data-bbox="1160 671 2042 730"><i>Figure 70 - View of a grave with packed stones and an upright stone grave marker. The scale is in 10cm increments.</i></p>	

6.1 Sensitivity assessment outcome

From the desktop assessment low to high heritage sensitive areas were identified. Many of the heritage sensitive areas identified during the desktop search consisted of old structures and buildings that have either been destroyed or been altered by their current occupants.

During the survey, fourteen (14) heritage sites were identified. Of these 14 sites, ten (10) sites (**WWF1-01** to **WWF1-10**) consist of structures (Farmhouses, Labourer houses, farm sheds and kraals), and four (4) sites contain graves (**WWF1-11** to **WWF1-14**).

WWF1-03, WWF1-04, WWF1-09 and **WWF1-10** were deemed NCW and is not of research potential or other cultural significance. **WWF1-01, WWF1-02,** and **WWF1-05** to **WWF1-06** have low heritage significance and low heritage sensitivity. Four sites contain graves (**WWF1-11** to **WWF1-14**). These sites have a high heritage significance and heritage rating of IIIA. These sites have high heritage sensitivity.

7 PALAEOLOGY

The palaeontological impact assessment (PIA) conducted by Banzai Environmental (Butler, 2020) determined that the site is underlain by the Dwyka Group, Collingham Formation, Whitehill Formation, Prince Albert Formation, Rippon Formation, Fort Brown Formation (Ecca Group, Karoo Supergroup), Koonap Formation, Middleton Formation and Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup), and Dolerite.

According to the PalaeoMap of SAHRIS the Palaeontological Sensitivity of the Dwyka Group is Low, the Collingham Formation, Rippon Formation, Fort Brown Formation of the Ecca Group is Moderate, while the Prince Albert Formation has a High and the Whitehill Formation of the Ecca has a Very High Palaeontological Sensitivity. The Adelaide Subgroup has a Very high Palaeontological Sensitivity while Dolerite is igneous in origin and thus has an Insignificant Paleontological Sensitivity (Almond et al, 2013; SAHRIS website). As can be seen in **Figure 73**, the proposed area of the project footprint occurs in an area where the palaeontology is assessed as being rated as Low to Very High sensitivity (red and blue). As such a field assessment and protocol for finds is required. The geology of the proposed Hamlett Wind Farm is indicated on the 1: 250 000 3326 Grahams Town (Council for Geosciences) (**Figure 72**).

A 3-day site-specific field survey of the development footprint was conducted on foot and by a motor vehicle on 20 November to 23 November 2020. No visible evidence of fossiliferous outcrops was found but well-preserved fossils may thus be found during excavations and care must be taken to preserve them- see protocol for finds.

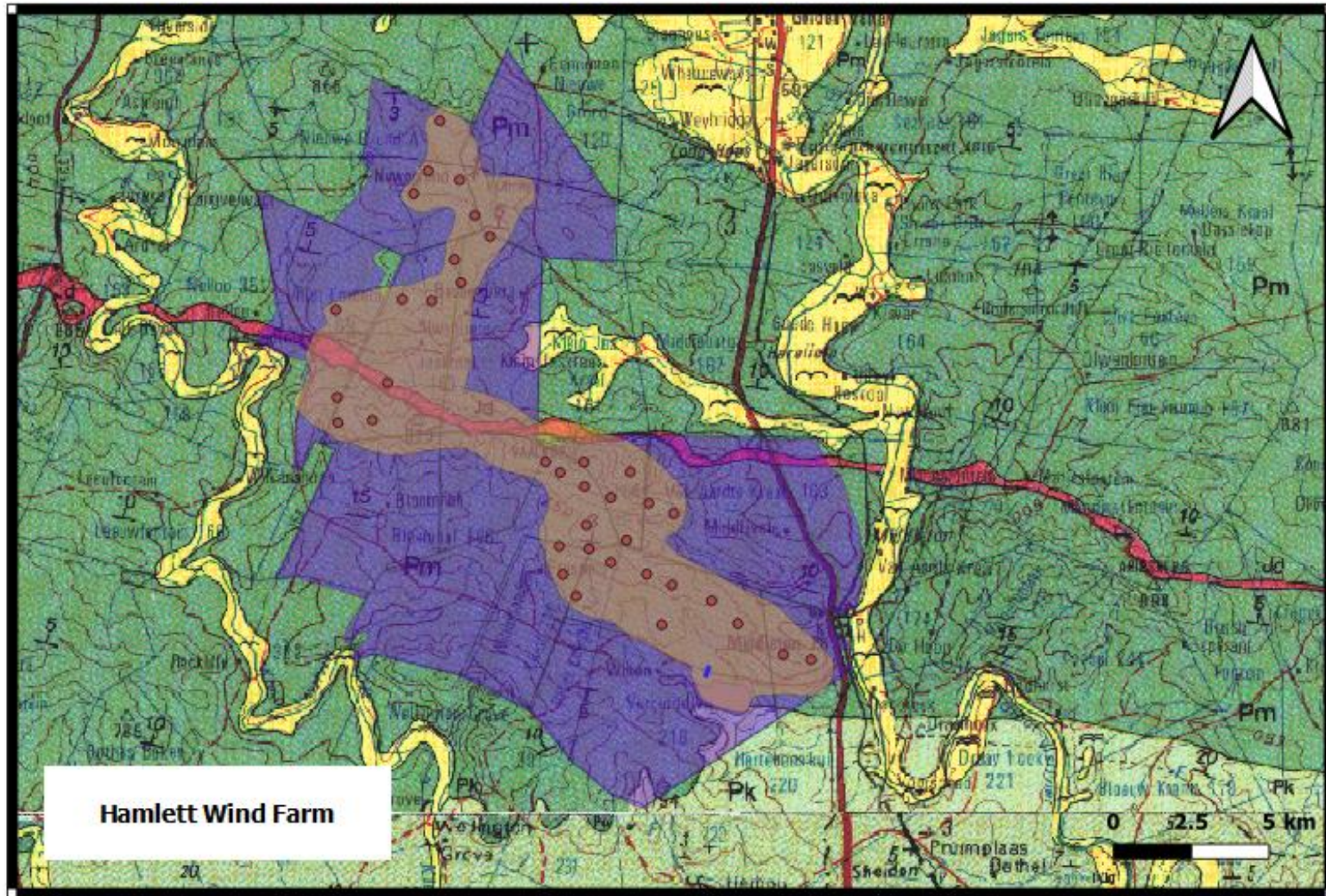


Figure 72 - Extract of the 1:250 000 3324 Port Elizabeth Geological Map (Council of Geosciences [Pretoria]) indicating the Western Block (Hamlett) Wind Farms.



Legend

Qc-Quaternary-Calcrete

Jd-Dolerite

Pb- Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup); Sandstone and Grey mudstone

Pm- Middleton Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup); Sandstone; Grey and red mudstone

Pk- Koonap Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup); sandstone, shale and grey mudstone

Pf- Fort Brown Formation (Ecca Group, Karoo Supergroup); Shale

Pr-Rippon Formation (Ecca Group, Karoo Supergroup); sandstone and shale

Pp- Collingham Formation, Whitehill Formation, Prince Albert Formation (Ecca Group, Karoo Supergroup)

C-Pd- Dwyka, Tillite

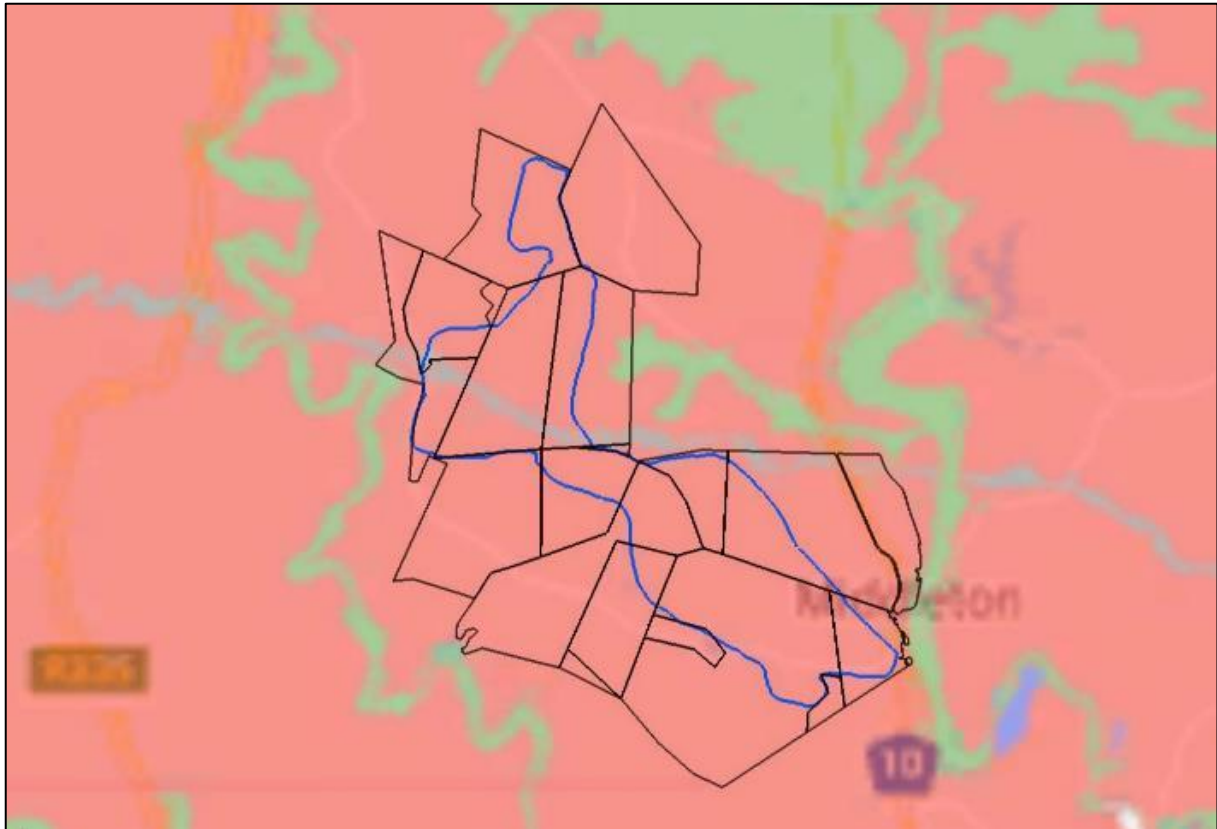


Figure 73 – Overlay of the Hamlett Wind Farm on the palaeosensitivity map from the SAHRIS database. This shows that most of the proposed development footprint (blue polygon) falls in an area that is coloured red and blue, which is rated as Low to Very High sensitivity.

Table 7 - SAHRIS palaeosensitivity ratings table.

Colour	Sensitivity	Required Action
Red	Very High	field assessment and protocol for finds is required
Orange/Yellow	High	Desktop study is required and based on the outcome of the desktop study; a field assessment is likely
Green	Moderate	Desktop study is required
Blue	Low	No palaeontological studies are required however a protocol for finds is required
Grey	Insignificant/Zero	No palaeontological studies are required
White/Clear	Unknown	These areas will require a minimum of a desktop study. As more information comes

8 CULTURAL LANDSCAPE

As part of assessing the impact of WEF on archaeological and historical resources, cultural landscape assessments have become a significant factor when considering proposed WEF. The areas investigated for the proposed Hamlett WEF within the Blue Crane Route Local Municipality and the Sarah Baartman District Municipality in the Eastern Cape Province is considered to have medium cultural heritage significance.

Sections of this Cultural Landscape Assessment is taken from the Visual Impact Assessment (VIA), conducted for the Hamlet Wind Farm by Lourens du Plessis of LOGIS, who is a Professional Geographical Information Sciences (GISc) Practitioner.

8.1 Cultural landscapes

According to Booth (2016), “*Cultural landscapes can be interpreted as complex and rich extended historical records conceptualised as organisations of space, time, meaning, and communication moulded through cultural process.*” Because cultural landscapes can be associated with people of specific events, they represent the interface between the effect of human culture and identity has had on physical places, and the meanings these spaces have in human memory. At its core the cultural landscape represents both the ‘natural’ ecological processes and phenomena, as well as the changes emerging from the process of transformation of the landscape by communities who use, live and transform specific regions/areas, adapting it to their needs (Jansen & Franklin, 2021). These transformed spaces, along with cultural values, regional identities and traditions are what one generation inherits from the previous. As such when evaluating the significance of the cultural landscape it is important to understand and consider all its components including tangible and intangible aspects; as well as the natural and cultural process that have transformed the area.

In 1992 the World Heritage Committee, defined cultural landscapes as “*a representation of the combined worlds of nature and of man illustrative of the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both external and internal*” (UNESCO, 2020).

8.1.1 Cultural landscapes in a REDZ Zone

The proposed Hamlet Wind Farm is situated in the Cookhouse Renewable Energy Development Zone (REDZ) and the Eastern Corridor of the Strategic Transmission Corridors specifically designated for large-scale wind and solar energy facilities. With the development of WEF within the REDZ zone it is expected that the “*cultural landscape of an area will be changed to be dominated, or at least heavily altered, by renewable energy development*” (Lavin, 2021). Several WEF have been developed in the

broader region. These modern developments do constitute a transformation of the cultural landscape, through the addition of another layer of human intervention. According to Lavin (2021) the creating of an additional layer onto the cultural landscape of an area, within a REDZ Zone is acceptable. However, the negative impact (the destruction of older archaeological or historical layers) of the Cultural landscape should not be ignored.

These impacts can be mitigated in various ways. As such it should be noted that the addition of the Hamlett WEF to this area will create another layer to the exciting Cultural landscape. In this assessment, the aim is to ensure that other aspects of the Cultural Landscape are not destroyed or overridden as a result of this additional layer.

8.2 The Hamlett Cultural Landscape

The Hamlett can be divided into various landscape character areas with several cultural heritage resource types. These units were determined by taking the larger landscape context into consideration in order to understand the character and cultural heritage values that underpin the proposed development site. This section was informed by the VIA conducted by du Plessis (2021).

8.2.1 Hamlet – Land Use

The majority of the study area is sparsely populated (less than 10 people per km²) and consists of a landscape of wide-open spaces and very little development. The largest concentrations of people are located at Somerset East, Cookhouse, Bedford and Alicedale, the main towns within the region. The Hamlet WEF is located in a rural area, currently zoned as agriculture, at a distance of approximately 27km south-east of Somerset East (du Plessis, 2021).

Besides the limited cultivation of crops, the study area is largely in a natural state, with mainly sheep and game farming as additional economic activities (du Plessis, 2021). Farm residences, or homesteads, dot the landscape at an irregular interval. These homesteads are generally located at great distances from each other (i.e. more than 3km apart), except for the Golden Valley, Ondersmoordrif and Middleton agricultural areas along the Great Fish River where they are more concentrated (du Plessis, 2021).

A large number of overhead power lines in close proximity to the development site (du Plessis, 2021). These include:

- Golden Valley/Rippon 1 220kV
- Poseidon/Grassridge 1 and 2 400kV
- Poseidon/Dedisa 1 400kV
- Rippon/SATS 1 and 2 220kV
- Rippon/Doringkom 1 220kV

The entire proposed Hamlett development envelope is located within the Cookhouse REDZ and the Gazetted Eastern Power Corridor. As such there are several Renewable Energy Environmental Applications (REEA) within the Cookhouse REDZ. Applications that have been approved or constructed include (du Plessis, 2021):

- Amakhala Emoyeni Wind Farm
- Cookhouse Wind Farm
- Golden Valley Wind Farm
- Msenge Emoyeni Wind Farm
- Izidluli Emoyeni Wind Farm
- Nxuba Wind Farm
- Nojoli Wind Farm
- Waainek Wind Farm
- Highlands Wind Energy Facility

8.2.2 *Vegetation*

The vegetation cover in the region is primarily *grassland* and *low shrubland*, with some *forest* and *woodland* occurring along the banks of the Little Fish and Great Fish Rivers. The floodplains of these rivers are indicated as *Southern Karoo Riviere*, whilst the grassland and low shrubland is respectively referred to as *Albany Broken Veld* and *Great Fish Thicket*. In the higher lying mountainous terrain the vegetation types are *Kowie Thicket* and *Suurberg Shale Fynbos* (du Plessis, 2021):

8.2.3 *Mountainous ridges*

The study area occurs on land that ranges in elevation from approximately 140m above sea level (south of the Addo Elephant National Park) to 1,610m (at the top of the Bosberg Mountains north of Somerset East). The proposed development envelope spans across strongly undulating plains and hills and tall hills at an average elevation of 667m above sea level. The larger study area is located in between the Bosberg Mountains (to the north) and the Suurberge to the south on terrain morphological units ranging from plains in the centre to strongly undulating plains and hills to the north and south (du Plessis, 2021).

8.2.4 *Riverine corridors*

The largest hydrological features include the perennial Great Fish and Little Fish Rivers that drain from the northern mountains in a southerly direction. The confluence of these rivers is on the plains, east of the N10 national road. The proposed development envelope is situated in between the two rivers upstream from the confluence, on ridges west of the N10. Besides these rivers there are a number of non-perennial drainage lines and farm dams within the study area. The region is relatively arid and is referred to as the Nama-Karoo Biome (Lower Karoo Bioregion). The average rainfall is indicated at between 300 – 500mm per annum (du Plessis, 2021).

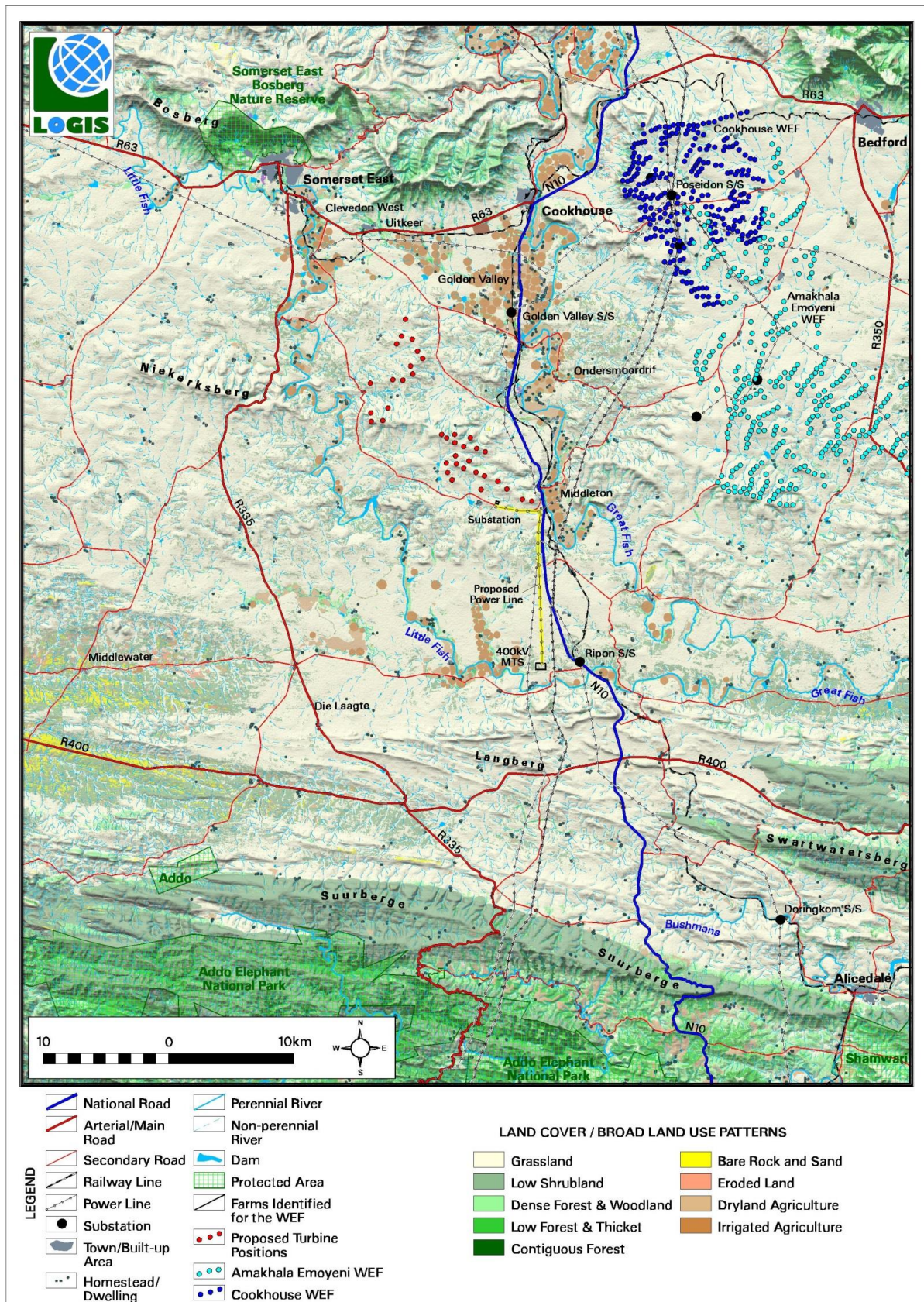


Figure 74 – Map of the land cover and broad land use patterns. Protected areas are indicated in green (Source: LOGIS/Du Plessis, 2021).

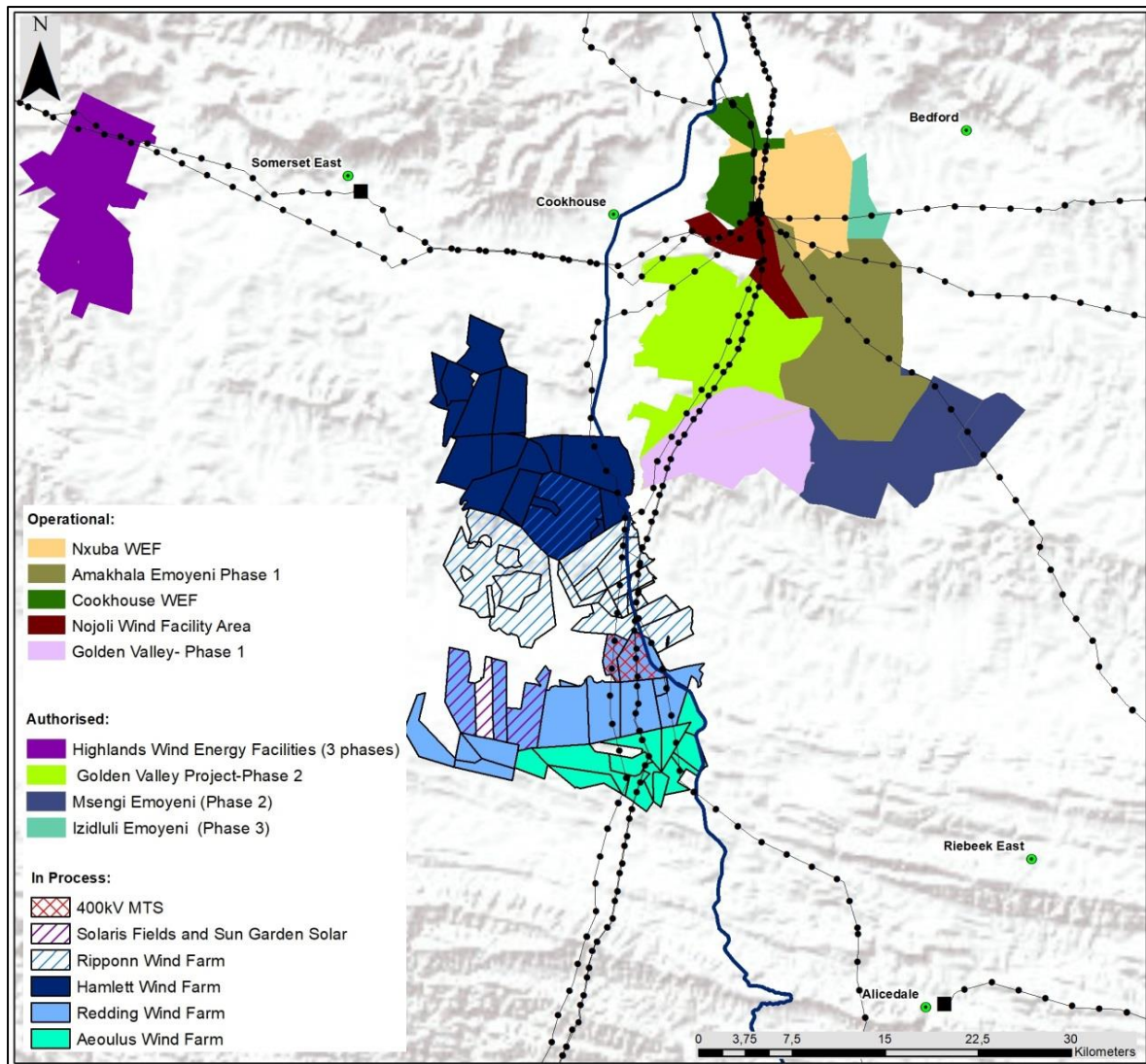


Figure 75 - Cumulative map of WEF developments within the western section of the Cookhouse REDZ (Source: Savannah Environmental).

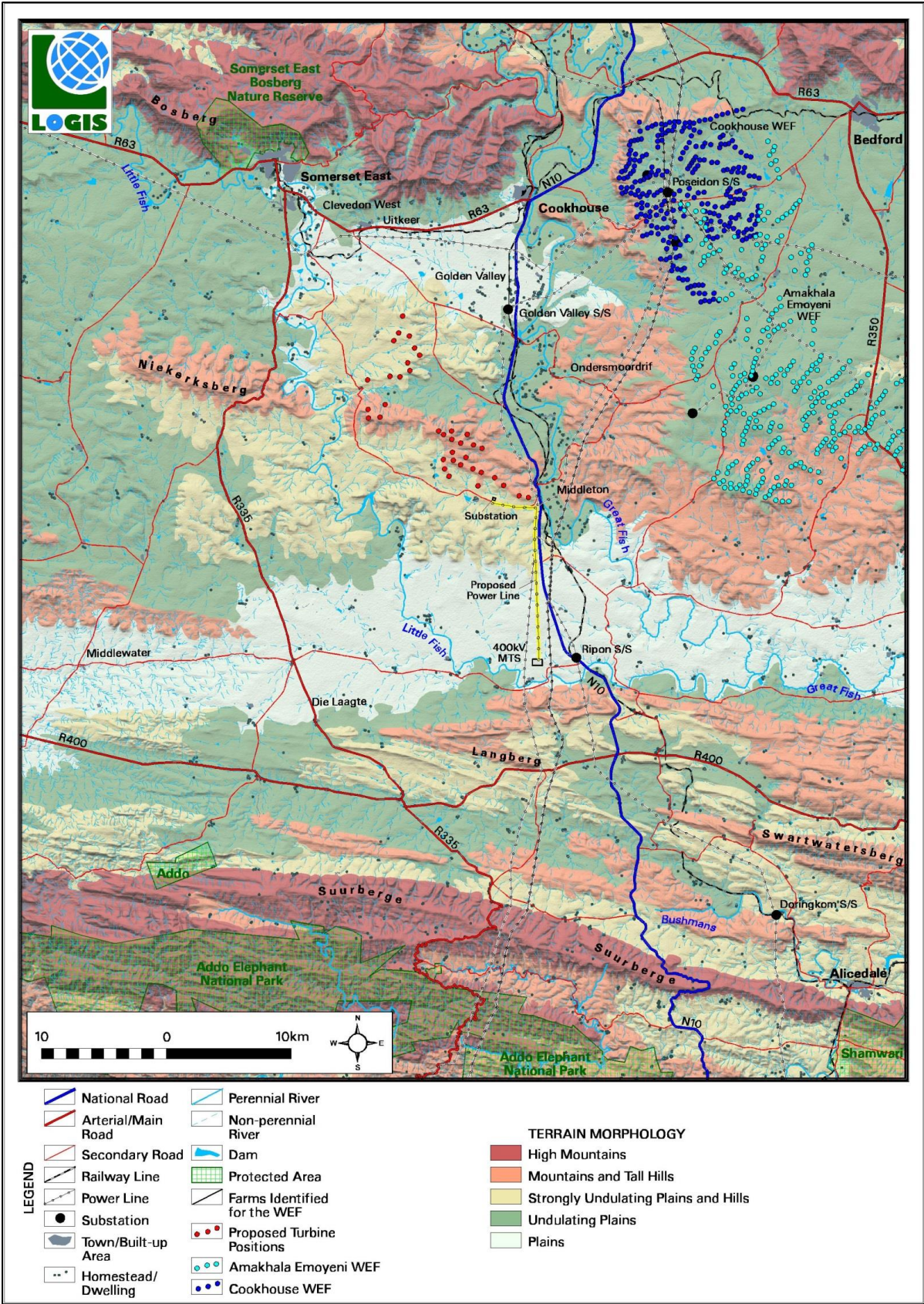


Figure 76 - Map of the Terrain morphology (Source: LOGIS/Du Plessis, 2021)

The man-made and natural heritage resources interacting with the above characteristic landscape types are:

8.2.5 *Historic farmsteads*

Two Farmsteads (including outbuildings and stonewalling features and built environment structures.), five sites containing labourer houses, and three stone kraals were identified within the proposed Hamlett WEF area. The historical structures and Farmsteads are situated adjacent or close to the existing roads that pass through the homesteads.

Sites **WWF1-03**, **WWF1-04**, **WWF1-09** and **WWF1-10** were deemed NCW and is not of research potential or other cultural significance. **WWF1-01**, **WWF1-02**, and **WWF1-05** to **WWF1-06** have low heritage significance and low heritage sensitivity. The farmsteads and historical structures that were considered as having a low cultural significance and has been allocated a heritage grading of Low heritage significance and heritage rating of IIIc and fall under the Protection of Section 34 of the National Heritage Resources Act 25 of 1999.

8.2.6 *Burial Grounds and Graves*

Four burial grounds and graves (**WWF1-11 to WWF1-14**) were identified. The historical family or labourer cemeteries are usually situated within close proximity or apart of the homestead or labourer cottages.

WWF1-11 consist of 30 graves on the Farm Rietfontein 159. It is possible that the graves belong to the labourers who used to occupy the houses found at site **WWF1-01**. **WWF1-12** consist of 15 graves found on the Farm Rietfontein 159. The marked graves belong to the De Klerk family who used to occupy the house found at site **WWF1-05**. **WWF1-13** consist of 15 graves found on the Farm Jaskraal 160. The graves most likely belong to the labourers who used to occupy the houses found at site **WWF1-07**. **WWF1-14** consist of graves found on the Farm Jaskraal 160. The graves most likely belong to the labourers who used to occupy the houses found at site **WWF1-08**. The graves/burials are considered as having a high cultural significance and has been allocated a heritage grading of High heritage significance and heritage rating of IIIA and fall under the Protection of Section 36 of the National Heritage Resources Act 25 of 1999.

8.2.7 *Historic routes and gateways*

Currently, the N10 national road provides motorised access to the region from the city of Port Elizabeth, the largest urban centre closest to the site (approximately 145km by road). Another 4km gravel road (the Bloemhof secondary road) provides the quickest access to the proposed development site from the N10 (du Plessis, 2021).

Several historic routes and ox wagon trails cross the farms to neighbouring farmsteads and towns. Many of the roads were used to link the various Cape Colony military posts located on farms between Grahamstown and Somerset (**Figure 79 - Figure 80**).



Figure 77 - Access Road from the N10 to the proposed Hamlett project site (du Plessis, 2021).



Figure 78 - View of the development site from the N10 national road (du Plessis, 2021).

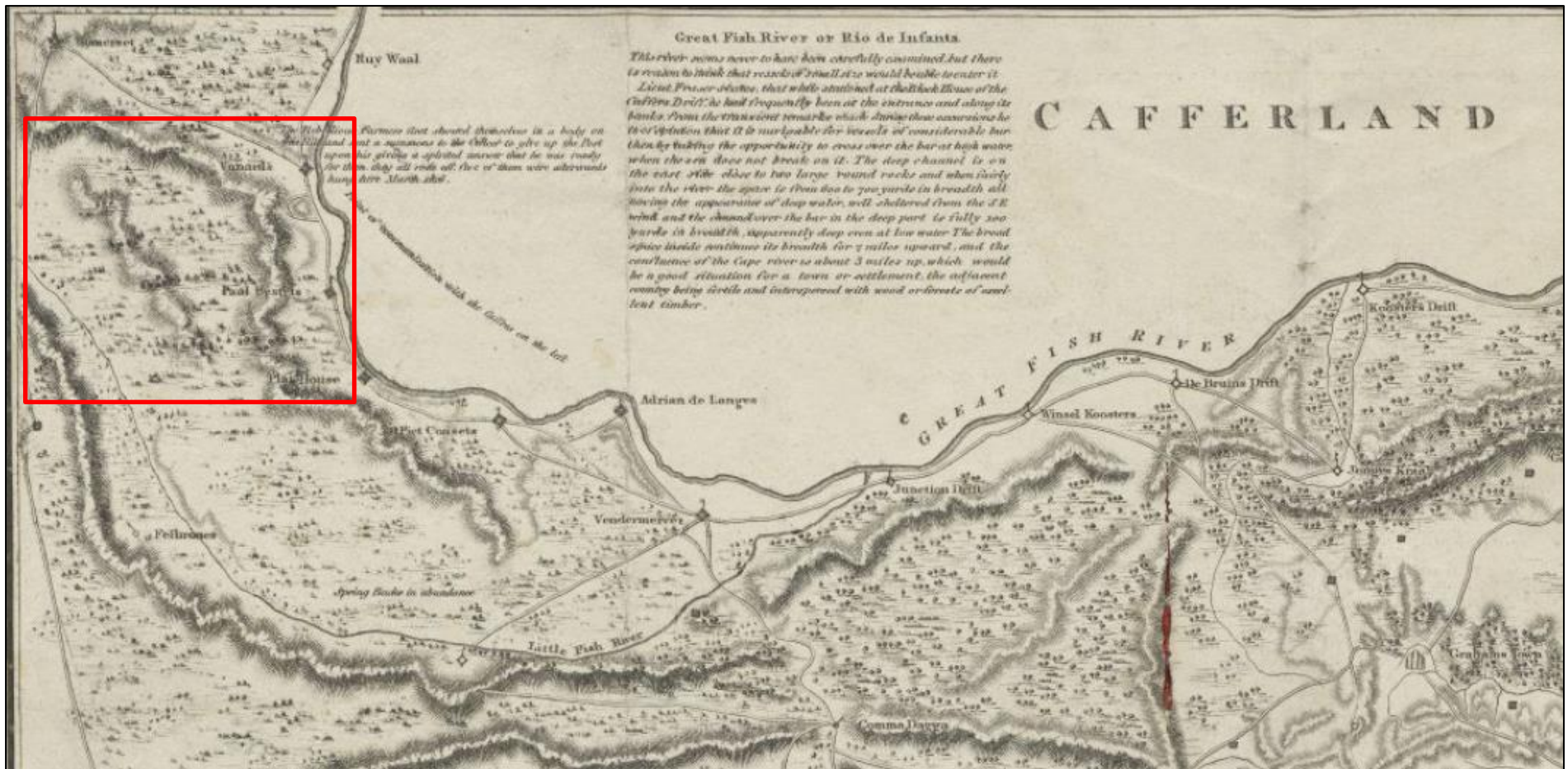


Figure 79 - Section of the Military Sketch of that part of the Colony of the Cape of Good Hope indicating the different Military Posts, Farms, Roads, and Rivers. Faithfully Delineated By Wily of His Majesty's 83 Regt in the year 1816. Several military posts are located on the farms between Grahamstown and Somerset. The posts were connected by several roads linking each of the farms. Approximate location of the Hamlet Wind Farm indicated by the red square (Cartographer: Wily & Faden, 1818).



Figure 80 - Section of the Plan of the Eastern Frontier Cape of Good Hope (Cartographer: Reid, 1847). Note the various roads interlinking the various farms between Grahamstown and Somerset, as well as the meandering Great Fish River and Little Fish River that runs through the area. Approximate location of the Hamlet Wind Farm indicated by the red square.

8.2.8 Conservation areas

There are no designated protected areas or other identified tourist attractions or destinations within close proximity to the development envelope. The Somerset East Bosberg Nature Reserve is located approximately 15km north-west of the site, north of the town of Somerset East. The Addo Elephant National Park is located south of the Suurberge at distances exceeding 35km (du Plessis, 2021).

9 SOCIO-ECONOMIC PROJECT INITIATIVE

In this section, the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development, as prescribed by Section 38(3)(d) requirement of the NHRA will be discussed.

The Socio-Economic Impact Assessment Report for Hamlett Wind Farm was completed by Matthew Keeley, a Senior Development Economist, and Elena Broughton, the Unit Manager: Innovation and Sustainable Development; Senior Development Economist of Urban-Econ Development Economists in 2021.

9.1 Economic Impact of SED Spend

As required by the National Energy Regulator of South Africa in relation to an Application for an Electricity Generation Licence in terms of the Electricity Generation Act (No. 4 of 2006), the applicant is required to demonstrate certain commitments to empowerment and economic development within the designated local area. The developer of the proposed WEF has communicated that their total forecasted SED spend for the fully operational Hamlett WEF will be in order of 2.5% of the Gross Annual Revenue generated.

Of the 2.5%, 0.5% will be contributed to the Just Energy Transition Fund, with the remaining 2% being spent on community development initiatives within the immediate vicinity of the proposed project.

Given the planned 333 MW generation capacity of the Hamlett WEF, the total estimated contribution to SED within the study area is estimated at R19.5 million per annum with the figure increasing annually by CPI. Over the first ten years of operation, this equates to a forecasted SED spend of R239.67 million, while over the full lifecycle of the project SED spend as anticipated to amount to R611.88 million. The developer of Hamlett WEF has prepared a Conservation Framework document putting forward its intentions when it comes to its future intended commitments to community development within the immediate vicinity of the proposed project. Their intentions are that their future socio-economic interventions in the area should also include conservation-related interventions. These should dually seek to increase both the wealth and the overall well-being of communities, while at the same time ensuring the extension of conservation efforts in the region. The latter includes the promotion of eco-tourism in the region.

The objectives of the above are set out as follows:

Socio-economic spend objectives:

- Increase in the level and diversify the type of skills in communities required to support conscious conservation; and

- Creation of sustainable employment opportunities for the local community which results in a sustainable increase in household income.

Conservation spend objectives:

- Preservation of pristine natural assets abounding in Blue Crane Route Municipality for the purpose both of conservation and the promotion of eco-tourism; and
- Protection of natural assets that are indigenous and endangered, for the purpose of preserving these assets for future generations.

9.2 Community Enrichment Initiative Spending

The developer's SED spend commitments related to local community enrichment initiatives are detailed below. In future planning, specific budget allocations from the total annual figures presented above will be targeting at the following initiatives:

- **Skills Development:** Both on-project, and non-wind energy skills development initiatives will be funded. The non-wind energy skills to be developed should be relevant and required in the region and should seek to provide value to the community and the environment.
- **Employment Opportunities:** In addition to the planned employment creation during construction and 20-year operation of the WEF, the developer intends to make a positive contribution to employment opportunities in other non-wind related industries. Given the anticipated SED spend commitments, it is assumed that up to R8.78 million could potentially be channelled towards both short- and long-term job opportunities on an annual basis.
- **Standard of living for local communities:** skills development coupled with sustainable employment creation opportunities listed above, are expected to contribute towards an improved standard of living amongst families that might not have had a sustainable income previously.
- **Conservation Contributions:** The developer has recognised that for a certain portion of visitors to the study area, their perceptions regarding the placement of wind turbines close to an area of biodiversity conservation, it will be important that resources are channelled towards the natural assets of the region and their protection. The developer proposes the introduction of various programmes, that it will design in conjunction with landowners in the area that would cumulatively make a marked difference in terms of conservation of the region generally, and protected areas specifically. This might include:
 - Financial contributions towards increases in available veterinarian capacity in the area
 - Financial contributions towards increasing the number of game rangers available for nature and game reserves
 - Financial contributions towards increased anti-poaching activities and assets
 - Financial contributions towards setting up an Emergency Animal Wellness Fund.

10 IMPACT ASSESSMENT

The impact significance rating process serves two purposes: firstly, it helps to highlight the critical impacts requiring consideration in the management and approval process; secondly, it shows the primary impact characteristics, as defined above, used to evaluate impact significance.

The impacts will be ranked according to the methodology described below. Where possible, mitigation measures will be provided to manage impacts. In order to ensure uniformity, a standard impact assessment methodology will be utilised so that a wide range of impacts can be compared with each other. Direct, indirect and cumulative impacts will be assessed in terms of the following criteria:

- » **Nature**, which shall include a description of what causes the effect, what will be affected and how it will be affected.
- » The **extent**, wherein it will be indicated whether the impact will be local (limited to the immediate area or site of development) or regional, and a value between 1 and 5 will be assigned as appropriate (with 1 being low and 5 being high):
- » The **duration**, wherein it will be indicated whether:
 - * the lifetime of the impact will be of very short duration (0–1 year) – assigned a score of 1;
 - * the lifetime of the impact will be of short duration (2-5 years) - assigned a score of 2;
 - * medium-term (5–15 years) – assigned a score of 3;
 - * long term (> 15 years) - assigned a score of 4; or
 - * permanent - assigned a score of 5;
- » The **magnitude**, quantified on a scale from 0-10, where 0 is small and will have no effect on the environment, 2 is minor and will not result in an impact on processes, 4 is low and will cause a slight impact on processes, 6 is moderate and will result in processes continuing but in a modified way, 8 is high (processes are altered to the extent that they temporarily cease), and 10 is very high and results in the complete destruction of patterns and permanent cessation of processes.
- » The **probability of occurrence**, which shall describe the likelihood of the impact actually occurring. The probability will be estimated on a scale of 1–5, where 1 is very improbable (probably will not happen), 2 is improbable (some possibility, but low likelihood), 3 is probable (a distinct possibility), 4 is highly probable (most likely) and 5 is definite (impact will occur regardless of any prevention measures).
- » the **significance**, which shall be determined through a synthesis of the characteristics described above and can be assessed as low, medium or high; and
- » the **status**, which will be described as either positive, negative or neutral.
- » the degree to which the impact can be reversed.
- » the degree to which the impact may cause irreplaceable loss of resources.
- » the *degree* to which the impact can be *mitigated*.

The **significance** is calculated by combining the criteria in the following formula:

$$S=(E+D+M) \times P$$

S = Significance weighting

E = Extent

D = Duration

M = Magnitude

P = Probability

The **significance weightings** for each potential impact are as follows:

- » < 30 points: Low (i.e. where this impact would not have a direct influence on the decision to develop in the area),
- » 30-60 points: Medium (i.e. where the impact could influence the decision to develop in the area unless it is effectively mitigated),
- » > 60 points: High (i.e. where the impact must have an influence on the decision process to develop in the area).

10.1 Assessment of Cumulative Impacts

As per DEA's requirements, specialists are required to assess the cumulative impacts. In this regard, please refer to the methodology below that will need to be used for the assessment of Cumulative Impacts.

"Cumulative Impact", in relation to an activity, means the past, current and reasonably foreseeable future impact of an activity, considered together with the impact of activities associated with that activity, that in itself may not be significant, but may become significant when added to existing and reasonably foreseeable impacts eventuating from similar or diverse activities².

The role of the cumulative assessment is to test if such impacts are relevant to the proposed project in the proposed location (i.e. whether the addition of the proposed project in the area will increase the impact). This section should address whether the construction of the proposed development will result in:

- » Unacceptable risk
- » Unacceptable loss
- » Complete or whole-scale changes to the environment or sense of place
- » Unacceptable increase in impact

The specialist is required to conclude if the proposed development will result in any unacceptable loss or impact considering all the projects proposed in the area.

² Unless otherwise stated, all definitions are from the 2014 EIA Regulations, GNR 326.

Example of a cumulative impact table:

Nature: Complete or whole-scale changes to the environment or sense of place (example)

Nature: [Outline and describe fully the impact anticipated as per the assessment undertaken]		
	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Low (1)	High (3)
Duration	Medium-term (3)	Medium-term (3)
Magnitude	Low (4)	Moderate (6)
Probability	Probable (3)	Probable (3)
Significance	Low (24)	Medium (36)
Status (positive or negative)	Negative	Negative
Reversibility	Low	Low
Irreplaceable loss of resources?	No	Yes
Can impacts be mitigated?	Yes	Yes
<p>Mitigation: “Mitigation“, means to anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible. Provide a description of how these mitigation measures will be undertaken keeping the above definition in mind</p>		
<p>Residual Impacts: “Residual Risk”, means the risk that will remain after all the recommended measures have been undertaken to mitigate the impact associated with the activity (Green Leaves III, 2014).</p>		

10.2 Heritage Impacts

During the survey, fourteen (14) heritage sites were identified. Of these 14 sites, ten (10) sites (**WWF1-01** to **WWF1-10**) consist of structures (Farmhouses, Labourer houses, farm sheds and kraals), and four (4) sites contain graves (**WWF1-11** to **WWF1-14**).

WWF1-03, WWF1-04, WWF1-09 and **WWF1-10** were deemed NCW and is not of research potential or other cultural significance. **WWF1-01, WWF1-02,** and **WWF1-05** to **WWF1-06** have low heritage significance and low heritage sensitivity. Four sites contain graves (**WWF1-11** to **WWF1-14**). These sites have a high heritage significance and heritage rating of IIIA. These sites have high heritage sensitivity.

10.2.1 Historical structures

WWF1-03, WWF1-04, WWF1-09 and WWF1-10 were rated as not conservation worthy and of no heritage significance.

The impact significance before mitigation on the structures will be LOW negative. *The impact of the proposed development will be local in extent. The possibility of the impact occurring is probable.* The expected duration of the impact is assessed as potentially permanent. Implementation of the recommended mitigation measures will reduce this impact rating to an acceptable LOW negative impact.

WWF1-01, WWF1-02, and WWF1-05 to WWF1-06 has a low heritage significance and heritage rating of IIIC.

The impact significance before mitigation on the structures will be MODERATE negative before mitigation. *The impact of the proposed development will be local in extent. The possibility of the impact occurring is probable.* The expected duration of the impact is assessed as potentially permanent. Implementation of the recommended mitigation measures will reduce this impact rating to an acceptable LOW negative impact.

Table 8 - Impact Assessment Table for Historical structures of low significance

Historical Structures have been identified during the survey. This site was rated as having a low heritage significance and heritage rating of IIIC.		
	Without mitigation	With mitigation
Extent	Regional (3)	Project Area (1)
Duration	Permanent (5)	Short term (2)
Magnitude	Minor (2)	Minor (2)
Probability	Improbable (2)	Unlikely (2)
Significance	Low (20)	Low (10)
Status (positive or negative)	Negative	Negative
Reversibility	Low	Low
The irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> In terms of general conservation of the historical farmsteads, a 500m no-go-buffer-zone is recommended. However, considering the impact of the proposed development of the Hamlett WEF on the cultural landscape of these historical farmsteads, a 1000m no-go-buffer-zone (inclusive of the 500m no-go-buffer-zone) should be implemented. If development occurs within 1000m the main homesteads/ "werf" need to be satisfactorily studied and recorded before impact occurs. Recording of the buildings i.e. (a) map indicating the position and footprint of all the buildings and structures (b) photographic recording of all the buildings and structures (c) measured drawings of the floor plans of the principal buildings. 		
Cumulative impacts:		

Considering the potential incremental, interactive, sequential and synergistic cumulative impacts, it is possible that the impact could lead to the irreplaceable loss of historical resources.

Residual Impacts:

Considering the nature of the sites identified in the present study, the residual risk will be moderate.

10.2.2 *Burial Grounds and graves*

WWF1-11 to **WWF1-14** has a high heritage significance and heritage rating of IIIA. These sites have high heritage sensitivity.

The impact significance before mitigation on the graves will be HIGH negative before mitigation. *The impact of the proposed development will be local in extent. The possibility of the impact occurring is probable.* The expected duration of the impact is assessed as potentially permanent. Implementation of the recommended mitigation measures will reduce this impact rating to an acceptable LOW negative impact.

Table 9 - Impact Assessment Table for Graves and Burial Grounds

Graves and Burial Grounds have been identified during the survey. These sites are of high significance and rated as IIIA.		
	Without mitigation	With mitigation
Extent	Regional (4)	Local (1)
Duration	Permanent (5)	Long-term (4)
Magnitude	High (8)	Low (2)
Probability	Highly Probable (4)	Unlikely (2)
Significance	High (68)	Low (14)
Status (positive or negative)	Negative	Negative
Reversibility	Low	Low
The irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	
Mitigation:		
<ul style="list-style-type: none"> The site should be demarcated with a 30-meter no-go-buffer zone and that the graves should be avoided and left in situ. A Grave Management Plan should be developed for the graves, to be implemented during the construction and operation phases (which needs approval by ECPHRA). If the site is going to be impacted and the graves need to be removed a grave relocation process for site is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with the ECPHRA under the NHRA and National Health Act regulations. 		
Cumulative impacts:		
Considering the potential incremental, interactive, sequential and synergistic cumulative impacts, it is possible that the impact could lead to the irreplaceable loss of burial grounds and graves.		
Residual Impacts:		
Considering the nature of the sites identified in the present study, the residual risk will be moderate.		

10.2.3 Palaeontological Impacts

According to the PIA the site is underlain by the the Dwyka Group, Collingham Formation, Whitehill Formation, Prince Albert Formation, Rippon Formation, Fort Brown Formation (Ecca Group, Karoo Supergroup), Koonap Formation, Middleton Formation and Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup), and Dolerite.

According to the PalaeoMap of SAHRIS the Palaeontological Sensitivity of the Dwyka Group is Low, the Collingham Formation, Rippon Formation, Fort Brown Formation of the Ecca Group is Moderate, while the Prince Albert Formation has a High and the Whitehill Formation of the Ecca has a Very High Palaeontological Sensitivity. The Adelaide Subgroup has a Very high Palaeontological Sensitivity while Dolerite is igneous in origin and thus has an Insignificant Paleontological Sensitivity (Almond et al, 2013; SAHRIS website). The proposed area of the project footprint occurs in an area where the palaeontology is assessed as being rated as Low to Very High sensitivity (red and blue).

According to the PIA the impact significance before mitigation on the Paleontological resources will be MODERATE negative before mitigation. *Only the study site will be affected by the proposed development.* The possibility of the impact occurring **is very likely**. The expected duration of the impact is assessed as potentially permanent. Implementation of the recommended mitigation measures will reduce this impact rating to an acceptable LOW negative impact.

Table 10 - Impact Assessment Table for Palaeontological Resources (After Butler, 2020)

Nature:		
The excavations and site clearance of the Wind Energy Facilities will involve extensive excavations into the superficial sediment cover as well as into the underlying bedrock. These excavations will change the existing topography and may destroy and seal-in fossils at or below the ground surface. These fossils will then be unavailable for research		
Impacts on Palaeontological Heritage are likely to happen only within the construction phase. No impacts are expected to occur during the operation phase.		
	Without mitigation	With mitigation
Extent	Development area (1)	Development area (1)
Duration	Permanent (5)	Medium-term (3)
Magnitude	High (8)	Minor (2)
Probability	Highly Probable (4)	Improbable (1)
Significance	Medium (-56)	Low (+6)
Status (positive or negative)	Negative	Neutral
Reversibility	Irreversible	
Irreplaceable loss of resources?	Yes	No
Can impacts be mitigated?	Yes	

Mitigation procedure: See Chance find protocol

Chance Find Procedure

- If a chance find is made the person responsible for the find must immediately **stop working** and all work must cease in the immediate vicinity of the find.
- The person who made the find must immediately **report** the find to his/her direct supervisor which in turn must report the find to his/her manager and the Environmental Officer (EO) (if appointed) or site manager. The EO must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.
- A preliminary report must be submitted to the Heritage Agency within **24 hours** of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.

Upon receipt of the preliminary report, the Heritage Agency will inform the EO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.

- The site must be secured to protect it from any further damage. **No attempt** should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage agency will also be able to advise on the most suitable method of protection of the find.
- In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the EO (or site manager). Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.
- Once Heritage Agency has issued the written authorization, the developer may continue with the development.

Residual Impacts:

Loss of fossil heritage

10.2.4 *Impact on Cultural Landscape elements*

According to Jansen and Franklin, (2021) as well as Lavin (2021) the impact of the proposed development on the cultural landscape will be assessed according to five core values developed by Job Roos (2007), the values include, include ecologic, aesthetic, historic, social and economic.

According to the VIA (de Plessis, 2021), an impact on the sense of place is one that alters the visual landscape to such an extent that the user experiences the environment differently, and more specifically, in a less appealing or less positive light. The greater environment has a rural, undeveloped character and a natural appearance. These generally undeveloped landscapes are considered to have a high visual quality. Without mitigation, the impacts to the cultural landscape elements would result in a high negative impact due to the magnitude and permanence of the impact on the cultural landscape, especially when considering aesthetic qualities of the various historic routes, natural landscape and homesteads

Table 11 - Impact Assessment Table for Cultural Landscape

Nature of Impact: Impact on historic cultural landscape elements by all phases of development.		
	Without mitigation	With mitigation
Extent	Regional (4)	Regional (4)
Duration	Permanent (5)	Permanent (5)
Magnitude	High (8)	Moderate (5)
Probability	Definite (5)	Definite (5)
Significance	High (85)	High (70)
Status (positive or negative)	Negative	Negative
Reversibility	Low	Low
Irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	
Cumulative impacts: Complete or whole-scale changes to the environment or sense of place		
Residual impacts: The character of the landscape will remain changed permanently after the duration of the project as over time the sense of place will change. It is unlikely that the infrastructure will be decommissioned.		
Mitigation:		
<ul style="list-style-type: none"> Mitigation measures as proposed in the HIA for the proposed Hamlett Wind Farm development that reduces negative impacts on the land use patterns and living heritage will reduce the impact of this facility on the overall load. The mitigation measures proposed for heritage resources will reduce the negative cumulative impact on the cultural landscape and should be implemented as recommended. <p>According to the Visual impact assessment (VIA) of LOGIS by Du Plessis (2021) no mitigation of the impact on the sense of place of the region or the cultural landscape is possible as the structures will be visible regardless. However, the following general mitigation measures are proposed:</p> <ul style="list-style-type: none"> The natural vegetation in all areas outside of the development footprint/servitude must be maintained/re-established during the planning phase. Maintain the general appearance of the facility as a whole during the operational phase Remove the infrastructure not required for the post-decommissioning use and rehabilitate all areas. <p>General mitigation measures for renewable energy development in areas of cultural landscape significance as proposed by Jansen and Franklin, (2021) as well as Lavin (2021) is recommended:</p> <p>Ecological:</p> <ul style="list-style-type: none"> Species and ecosystem loss should be prevented by limiting fragmentation in the landscape, and should therefore adhere to the following general recommendations: Remaining areas of endemic and endangered natural vegetation should be conserved. 		

- High and Very High Sensitivity Ecological areas (crest lines and drainage lines), should be protected from development.
- Areas of habitat are found among the rocky outcrops and contribute to the character, as well as biodiversity of the area. Care should be taken that habitats are not needlessly destroyed.
- Careful planning should incorporate areas for stormwater runoff where the base of the structure disturbed the natural soil. Local rocks found on the site could be used to slow stormwater (instead of concrete, or standard edge treatments), and prevent erosion that would be an unfortunate consequence that would alter the character of the site. By using rocks from site, it helps to sensitively keep to the character.
- The principle of 'tread lightly' must be applied for any activity (and associated development requirements e.g. toilets for the construction process) should be emphasised.

Aesthetic:

- Encourage mitigation measures (for instance use of vegetation) to 'embed' or disguise the proposed structures within the surrounding tourism and agricultural landscape at ground level, road edges etc;
- The continuation of the traditional use of material could be enhanced with the use of the rocks on the site as building material. This would also help to embed structures into the landscape that does not have to be standard containers that clutter the landscape.
- Using material found on the site adds to the sense of place and reduces transportation costs of bringing materials to site.
- Where additional infrastructure (i.e. roads) is needed, the upgrade of existing roads to accommodate the development should be the first consideration. The local material such as the rocks found within the area could be applied to address stormwater runoff from the road to prevent erosion.
- Infrastructure improvement, including new roads and upgrades to the road network, should be appropriate to the rural context (scale, material etc.).
- The layout of the turbines should have an emphasis on place-making, i.e. landscape-related heritage considerations, as opposed to standard infrastructure driven requirements;
- Prevent the construction of new buildings/structures on visually sensitive, steep, elevated or exposed slopes, ridgelines and hillcrests. Retain the integrity of the distinctive landscape character;
- Scale and massing should be sensitive to the surrounding landscape, although this is challenging with regard to the development of WEFs.
- Avoid visual clutter in the landscape by intrusive signage, and the intrusion of commercial corporate development along roads
- Avoid development of infrastructure (such as buildings, wind turbines and power lines), on crests or ridgelines due to the impact on the visual sensitivity of skylines.
- Retain view-lines and vistas focused on prominent natural features such as mountain peaks or hills, as these are important place-making and orientating elements for experiencing the cultural landscape.

Historic:

- The integrity of the historic farm werfs should be maintained and protected.
- Names of routes and watercourses that refer to traditional use during the time of the hunter-gatherers and herders, as well as the colonial era, should be celebrated.
- Traditional planting patterns should be protected by ensuring that existing trees are not needlessly destroyed, as these signify traces of cultural intervention in a harsh environment. These planting patterns include the trees planted around the werfs.
- In some cases, remnant planting patterns (even single trees) uphold the historic character of an area. Interpretation of these landscape features as historic remnants should occur.
- Mountain slopes have been used for traditional practices for many years, and care should be taken that any significant cultural sites, such as burials and veldkos/medicinal plant resources, are not disturbed.

- Where the historic function of a building/site is still intact, the function has heritage value and should be protected. Please take note of the items listed below:
- Surviving examples (wagon routes, outspans, and commonage), where they are owned in some public or communal way (or by a body responsible for acting in the public interest) and where they are found to be actively operating in a communal way, will have cultural and heritage value and should be enhanced and retained.
- The new roads should display minimum scale designs where possible.
- Maintain traditional movement patterns across rural landscapes or to places of socio-historical value. (a) Avoid privatization or the creation of barriers to traditional access routes. (b) Retain old roadways, which have been replaced by newer roads, for use as recreation trails.
- Respect existing patterns, typologies and traditions of settlement-making by promoting the continuity of heritage features. These include: (a) indigenous; (b) colonial; and (c) current living heritage in the form of tangible and intangible associations to place.
- Respect traditional werf settlement patterns by considering the entire werf as the component of significance. This includes the backdrop of the natural landscape against which it is sited, as well as its spatial structure. Any development that impacts the inherent character of the werf component should be discouraged.

Social:

- Care should be taken that existing functions such as outspan areas (see criteria for these under historic) are not lost in the development stages, as it fulfils an important function within the cultural landscape.
- The local community around the development should benefit from job opportunities created by the proposed development.

Economic:

- Sheep or game farming should be allowed to continue below the wind turbines, alternatively, the areas below the turbines should be rehabilitated to increase biodiversity in the area.
- Care should be taken to reduce visual impact from surrounding tourism areas, by following the recommendations included in the VIA.

10.3 Cumulative Impacts

This section evaluates the possible cumulative impacts on heritage resources with the addition of the Hamlett Wind Farm. Cumulative impacts are those impacts that act together to affect the same heritage resources within the region. Increased development in the greater Study Area will have a number of cumulative impacts on heritage resources. In this instance the cumulative impacts that could result from a combination of the proposed and current projects as well as other actual or proposed future developments in the broader area. The cumulative impacts considered below assumes that mitigation measures have been applied.

Table 12 – Cumulative Impact Assessment Table for Historical structures of low significance

Historical Structures have been identified during the survey. These sites were rated as having a low heritage significance and heritage rating of IIIC. Cumulative impacts to historical resources would occur during the construction and operation phase when the ground surface is cleared and when turbine, substation foundations and roads are excavated.		
	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Local (1)	Local (1)
Duration	Short term (2)	Long term (4)
Magnitude	Minor (2)	Minor (2)

Probability	Unlikely (2)	Unlikely (2)
Significance	Low (10)	Low (14)
Status (positive or negative)	Negative	Negative
Reversibility	Low	Low
The irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	
Mitigation: “Mitigation“, means to anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible. Mitigation measures as proposed in the HIA’s, and approved by the ECPHRA for the proposed facilities that reduce negative impacts on graves and burial grounds must be implemented in line with the NHRA 25 of 1999 and National Health Act regulations.		
Residual Impacts: “Residual Risk“, means the risk that will remain after all the recommended measures have been undertaken to mitigate the impact associated with the activity (Green Leaves III, 2014). Considering the nature of the sites identified in the present study, the residual risk will be moderate.		

Table 13 – Cumulative Impact Assessment Table for Graves and Burial Grounds

Graves and Burial Grounds have been identified during the survey. These sites are of high significance and rated as IIIA.		
Cumulative impacts to Burial Grounds and graves resources would occur during the construction and operation phase when the ground surface is cleared and when turbine, substation foundations and roads are excavated.		
	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Local (1)	Local (1)
Duration	Long-term (4)	Long-term (4)
Magnitude	Low (2)	Low (3)
Probability	Unlikely (2)	Unlikely (2)
Significance	Low (14)	Low (16)
Status (positive or negative)	Negative	Negative
Reversibility	Low	Low
The irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	
Mitigation: “Mitigation“, means to anticipate and prevent negative impacts and risks, then to minimise them, rehabilitate or repair impacts to the extent feasible. <ul style="list-style-type: none"> Mitigation measures as proposed in the HIA’s, and approved by the ECPHRA for the proposed facilities that reduce negative impacts on graves and burial grounds must be implemented in line with the NHRA 25 of 1999 and National Health Act regulations. 		
Residual Impacts: “Residual Risk“, means the risk that will remain after all the recommended measures have been undertaken to mitigate the impact associated with the activity (Green Leaves III, 2014). Considering the nature of the sites identified in the present study, the residual risk will be moderate.		

Table 14 – Cumulative Impact Assessment Table for Palaeontological Resources (After Butler, 2020)

Nature: Cumulative impacts on fossil remain preserved at or beneath the ground surface.		
	Overall impact of the proposed project considered in isolation	The cumulative impact of the project and other projects in the area
Extent	Local (1)	Local (1)
Duration	Permanent (5)	Medium-term (5)
Magnitude	Minor (2)	Minor (2)
Probability	Highly Probable (1)	Improbable (1)
Significance	Low (-8)	Low (+8)
Status (positive or negative)	Negative	Neutral
Reversibility	Irreversible	
Mitigation: Not necessary		
Residual Impacts: Loss of fossil heritage		

There are currently several applications being made for the development of WEFs in the area surrounding the Hamlet proposed WEF development site. According to the VIA, the significance of the visual impacts on the sense of place within the region (i.e. beyond a 20km radius of the development and within the greater region) is expected to be of low significance (du Plessis, 2021).

However, according to the VIA (du Plessis, 2021) the cumulative visual impact of the proposed Hamlett WEF, along with the other proposed WEF (Rippon, Redding and Aeolus), as well as the existing Amakhala Emoyeni (including Msengi and Izidluli Emoyeni WEFs) and Cookhouse WEFs (including Nxuba and Nojoli WEFs) is expected to be high, especially the potential sequential cumulative visual impact on observers driving along the N10 national road. This impact is relevant in spite of the fact that the wind farms are located in the Cookhouse REDZ

Table 15 – Cumulative Impact Assessment Table for Cultural Landscape

Nature of Impact: The potential cumulative visual impact of wind farms on the cultural landscape		
	Overall impact of the proposed project considered in isolation	Cumulative impact of the project and other projects in the area
Extent	Regional (5)	Immediate Area (3)
Duration	Long term (5)	Long term (4)
Magnitude	High (9)	Very high (10)
Probability	Highly probable (5)	Highly probable (4)
Significance	High (95)	High (68)
Status (positive, neutral or negative)	Negative	Negative
Reversibility	Low	Low
Irreplaceable loss of resources?	Yes	Yes
Can impacts be mitigated?	Yes	
Mitigation measures: As per CLA		

Residual impacts:

The visual impact will be removed after decommissioning, provided the WEF infrastructure is removed and the area rehabilitated. Failing this, the visual impact will remain. The character of the landscape will remain changed permanently after the duration of the project as over time the sense of place will change. It is unlikely that the infrastructure will be decommissioned.

10.4 Consideration of the socio-economic benefit relative to heritage resources

In this section, the impact of the development on heritage resources relative to the sustainable social and economic benefits to be derived from the development, as prescribed by Section 38(3)(d) requirement of the NHRA will be discussed.

It is evident that a larger portion of local farming has moved away from traditional farming to game farming and eco-tourism (SEIA, 2021). The study provides the following general facts related to the properties in the viewshed:

From the data obtained from surveyed landowners on which the various associated WEFs are to be developed, it is estimated that agricultural operations (including hunting and tourism) in the directly affected area employ approximately 40 people, the majority of whom are permanent employees. Most of the employees live on the farm and are those who do not, live in Cookhouse, Paterson or Somerset East. An additional 35 people live on the farms who are not labourers.

It is recognised that many farms in the area practice a combination of crop, livestock and hunting activity. As such, most farms are involved in all three land uses as indicated previously. The dominant activity currently undertaken on farms that were surveyed was agriculture but, notable numbers of tourist activities occur on the farms. The following observations were made regarding land use:

- All of the farmers are commercial farmers
- Goats and sheep were the most common animals found in the area (6 150 animals) followed by game (580 animals and then beef cattle (150 animals) across all respondents surveyed
- The average size of property owned was 2 946 and ranged between 850 and 7 300 ha
- The majority of labourers live on the farms they work on with their family members
- Livestock animals reared for sale and kept for production of food products include goats, sheep and cattle
- All of the farms were the primary residence of the farm owner
- Very few, if any, international tourists visit directly affected farms for the purpose of tourism or hunting
- Approximately 65 domestic tourists visited the area in a year. All being for the purpose of hunting
- Some of the farms have accommodation facilities for visitors

- Farms receive visitors mostly between April and December
- Some of the game farms earn income through the trading of live game

The immediate area surrounding the proposed Hamlett Wind Farm is very similar in terms of land use. There are farms that cater to mixed land uses including tourism and agriculture.

Adjacent and nearby properties in the broader vicinity of the proposed wind farm and associated WEFs are somewhat similar in terms of land use to the directly impacted farms. A number of eco-tourism and hunting-focused businesses are found within the broader vicinity of the study area.

Of all the adjacent properties owners approached for feedback, a total of six (6) were willing to participate and provide information pertaining to the economic activities undertaken on their respective farms.

- The average farm size is 3,811 ha
- The average number of employed individuals on each farm is 12, the majority of which are permanently employed.
- On average, 13 people reside permanently on each farm.
- Of those farms that offer trophy hunting activities, total guests that visit each farm range between 3 and 30 per annum, with all being domestic hunters. The average duration of stay for such domestic hunters is 5 days.
- In addition to hunters, the one of the farms also hosts domestic leisure/eco/adventure tourists, indicated at 15 visitors on average per annum. Such visitors typically spend 3 days on the farm during their stay
- Respondents have indicated that on average, revenue derived from tourist visits, ranged from R3,000 to R50,000 per annum.
- It is noted that there are a small number of farms within the viewshed of the development that still practice traditional forms of agriculture. For these farms a combination of beef, small livestock farming, and game breeding activities take place.
- For all responses received from adjacent owners, traditional agricultural farming is noted as being the predominant form of income for the respective properties.
- Of those farms that carry small stock units, the average number per farm is approximately 3,500 SSUs, while for beef, the average farm only carries 86 LSUs.

Keeping the above in mind the findings of the SEIA (2021) summarise that:

“The assessment of the proposed facility, and its net effect from a socio-economic perspective, indicates that the project would generate greater socio-economic benefits during both the construction and operational phases than the potential losses that could occur as a result of its establishment. Stimulation of production, employment, government revenue, skills development and household income as a result of the investment in the project and its subsequent operations will outweigh possible production, employment and household income losses that could be experienced by local businesses affected by changes in the areas aesthetic and visual resources. It should be noted though that the positive and negative impacts will be distributed mostly amongst different receptors but, will not result in inequality. Adherence to the proposed mitigation measures,

however, would ensure that the offset of impacts is more balanced and that it also takes into account communities and businesses that will be negatively affected.

The positive effects generated by the project will not offset many of the negative impacts. These include impacts on the sense of place and property and business values that could occur during both construction and operation, the effect on social and economic infrastructure, and crime and social conflicts in the area that could be created during only the construction phase. These impacts though will only affect local communities either temporarily or over the long term. These impacts are not highly significant and can be traded off for the net positive impact created by the project in terms of production, employment, government revenue, community benefits and households' earnings. This means that when compared with the no-go option, the proposed project is associated with greater socio-economic benefits.

The net positive impacts associated with the development and operation of the proposed wind energy facility are expected to outweigh the net negative effects. The project is also envisaged to have a positive stimulus on the local economy and employment creation, leading to the economy's diversification and a small reduction in the unemployment rate. The project should therefore be considered for development. It should, however, be acknowledged that the negative impacts would be largely borne by the nearby farms and households residing on them, whilst the positive impacts will be largely concentrated in the local and national economies. Due to this imbalance, it is recommended that the mitigation measures suggested be strictly adhered to. Application of these mitigation measures will ensure that the negative impacts on the nearby farms and businesses are minimised and that the distribution of the potential benefits of the project are more balanced".

The economic benefit for the region and the overall energy needs such a project address outweigh the need for the exclusion of the WEF to conserve cultural resources at all costs. Especially where a project is situated within a gazetted REDZ area.

10.5 Management recommendations and guidelines

10.5.1 Construction phase

The project will encompass a range of activities during the construction phase, including ground clearance, the establishment of construction camp areas and small-scale infrastructure development associated with the project.

It is possible that cultural material will be exposed during construction and may be recoverable, keeping in mind delays can be costly during construction and as such must be minimised. Development surrounding infrastructure and construction of facilities results in significant disturbance, however, foundation holes do offer a window into the past and it thus may be possible to rescue some of the data and materials. It is also possible that substantial alterations will be implemented during this phase of the project and these must be catered for. Temporary infrastructure developments, such as construction camps and laydown areas, are often changed

or added to the project as required. In general, these are low impact developments as they are superficial, resulting in a little alteration of the land surface, but still, need to be catered for.

During the construction phase, it is important to recognize any significant material being unearthed, making the correct judgment on which actions should be taken. It is recommended that the following chance find procedure should be implemented.

10.5.2 *Grave Management Plan guidelines*

The HIA identified several Burial Grounds and Graves (BGG). These will require management and mitigation if any of the resources will be affected by any construction-related activities. The following should be included in the Management Plan to be drafted for the BGG to be retained *in situ* in the project area:

- Direct what needs to be done, how the identified and accidentally discovered BGG must be protected and managed, and who will be responsible;
- Define the goals to be achieved and the type of activities;
- Guide any future construction or development-related activities;
- Determine the monitoring methodology;
- Assist with stakeholder engagement and identification of interested parties, if needed;
- Explain the permitting procedure;
- Describe any professional requirements and clarify responsibilities;
- Identify the significance of the heritage resources and provide guiding principles for activities on site;
- Identify the site value and provide guiding principles for activities on-site;
- Minimise loss or avoid adverse impacts on heritage resources;
- Ensure that cultural heritage is incorporated in spatial planning and linked to social strategies;
- Improve the understanding of cultural heritage and the contribution it makes to the broader management processes; and
- Ensure that proper investigation, recording and stakeholder meetings take place.
- Includes the Chance Finds Procedure, which outlines the process to follow if any culturally significant heritage resources are found during construction/or operation related activities.

10.5.3 *Chance find procedure*

- A heritage practitioner/archaeologist should be appointed to develop a heritage induction program and conduct training for the EO as well as team leaders in the identification of heritage resources and artefacts.
- An appropriately qualified heritage practitioner/archaeologist must be identified to be called upon in the event that any possible heritage resources or artefacts are identified.
- Should an archaeological site or cultural material be discovered during construction (or operation), the area should be demarcated, and construction activities halted.

- The qualified heritage practitioner/archaeologist will then need to come out to the site and evaluate the extent and importance of the heritage resources and make the necessary recommendations for mitigating the find and the impact on the heritage resource.
- The contractor therefore should have some sort of contingency plan so that operations could move elsewhere temporarily while the materials and data are recovered.
- Construction can commence as soon as the site has been cleared and signed off by the heritage practitioner/archaeologist.

10.5.4 Possible finds during construction and operation (mining activities)

The study area occurs within a greater historical and archaeological site as identified during the desktop and fieldwork phase. Soil clearance for infrastructure as well as the proposed reclamation activities could uncover the following:

- stone foundations;
- ash middens associated with the historical structures that can contain bone, glass and clay ceramics, ash, metal objects such as spoons, forks, and knives.
- unmarked graves

10.6 Timeframes

It must be kept in mind that mitigation and monitoring of heritage resources discovered during construction activity will require permitting for collection or excavation of heritage resources and lead times must be worked into the construction time frames. **Table 16** gives guidelines for lead times on permitting.

Table 16 - Lead times for permitting and mobilisation

Action	Responsibility	Timeframe
Preparation for field monitoring and finalisation of contracts	The contractor and service provider	1 month
Application for permits to do necessary mitigation work	Service provider – Archaeologist and SAHRA	3 months
Documentation, excavation and archaeological report on the relevant site	Service provider – Archaeologist	3 months
Handling of chance finds – Graves/Human Remains	Service provider – Archaeologist and SAHRA	2 weeks
Relocation of burial grounds or graves in the way of construction	Service provider – Archaeologist, SAHRA, local government and provincial government	6 months

10.7 Heritage Management Plan for EMPr implementation

Table 17 - Heritage Management Plan for EMPr implementation

Area and site no.	Mitigation measures	Phase	Timeframe	Responsible party for implementation	Monitoring Party (frequency)	Target	Performance indicators (monitoring tool)
General project area	<ul style="list-style-type: none"> Implement a chance to find procedures in case possible heritage finds are uncovered. A detailed “walk down” of the final approved turbine locations, access roads, powerlines and substations will be required before construction commences. Any heritage features of significance identified during this walk down will require formal mitigation (i.e. permitting where required) or where possible a slight change in design could accommodate such resources. A Heritage management plan (HMP) for the heritage resources needs to be compiled and approved for implementation during construction and operations where heritage features of significance are identified. 	Construction	During construction	Applicant EO Heritage Specialist	EO (monthly / as or when required)	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 36 and 38 of NHRA	EO Monthly Checklist/Report
Historical Structures that were rated as NCW (WWF1-03, WWF1-	<ul style="list-style-type: none"> No mitigation is required 	Construction	Prior to and during construction	Applicant EO Heritage Specialist	EO (monthly / as or when required)	Ensure compliance with relevant legislation and recommendations	EO Monthly Checklist/Report

Area and site no.	Mitigation measures	Phase	Timeframe	Responsible party for implementation	Monitoring Party (frequency)	Target	Performance indicators (monitoring tool)
04, WWF1-09 and WWF1-10)						from SAHRA under Section 36 and 38 of NHRA	
Historical Structures (WWF1-01, WWF1-02, and WWF1-05 to WWF1-06) that were rated as low heritage significance and heritage rating of IIC.	<ul style="list-style-type: none"> In terms of general conservation of the historical farmsteads, a 500m no-go-buffer-zone is recommended. However, considering the impact of the proposed development of the Frontier WEF on the cultural landscape of these historical farmsteads, a 1000m no-go-buffer-zone (inclusive of the 500m no-go-buffer-zone) should be implemented. If development occurs within 1000m of EWF1-03 the main homesteads/ "werf" need to be satisfactorily studied and recorded before impact occurs. Recording of the buildings i.e. (a) map indicating the position and footprint of all the buildings and structures (b) photographic recording of all the buildings and structures (c) measured drawings of the floor plans of the principal buildings. 	Construction	Prior to and during construction	Applicant EO Heritage Specialist	EO (monthly / as or when required)	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 36 and 38 of NHRA	EO Monthly Checklist/Report
Graves and Burial grounds (EWF2-05)	<ul style="list-style-type: none"> The sites should be demarcated with a 30-meter no-go-buffer-zone and the graves should be avoided and left in situ. A Grave Management Plan should be developed for the graves, to be implemented during the 	Construction	Prior to and during construction	Applicant EO Heritage Specialist	EO (monthly / as or when required)	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 36 and 38 of NHRA	EO Monthly Checklist/Report

Area and site no.	Mitigation measures	Phase	Timeframe	Responsible party for implementation	Monitoring Party (frequency)	Target	Performance indicators (monitoring tool)
	<p>construction and operation phases (which approval by ECPHRA.</p> <ul style="list-style-type: none"> If the site is going to be impacted directly and the graves need to be removed a grave relocation process for these sites is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with the ECPHRA under the NHRA and National Health Act regulations. 						
Possible graves	<ul style="list-style-type: none"> When graves are discovered/uncovered the site should be demarcated with a 30-meter no-go-buffer-zone and the grave should be avoided. Undertake archaeological monitoring at earth clearance stage. If human remains are discovered a grave relocation process is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with the 	Construction	During Construction	Applicant EO Heritage Specialist	EO (monthly / as or when required)	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 36 and 38 of NHRA	EO Monthly Checklist/Report

Area and site no.	Mitigation measures	Phase	Timeframe	Responsible party for implementation	Monitoring Party (frequency)	Target	Performance indicators (monitoring tool)
	<p>ECPHRA under the NHRA and National Health Act regulations.</p> <ul style="list-style-type: none"> If during the test excavations it is determined that the feature is not a grave, the site will then have no heritage significance and require no further mitigation. 						
Palaeontological finds	<ul style="list-style-type: none"> If fossil remains are discovered during any phase of construction, either on the surface or exposed by fresh excavations the Chance Find Protocol must be implemented by the EO in charge of these developments. Fossil discoveries ought to be protected and the EO/site manager must report to SAHRA 	Construction	Construction	Applicant EO Palaeontologist	Monthly	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 35 of NHRA	Final report to be used by the developer to apply for a destruction permit under s35 of the NHRA
Cultural Landscape	Refer to Table 11 of this report.	Construction	Construction	Applicant EO Heritage Specialist	EO (monthly / as or when required)	Ensure compliance with relevant legislation and recommendations from SAHRA under Section 36 and 38 of NHRA	EO Monthly Checklist/Report

11 CONCLUSIONS

The HIA has shown that the study area and surrounding area has some heritage resources situated within the proposed development boundaries. Through data analysis and a site investigation, the following issues were identified from a heritage perspective.

11.1 Heritage Sites

The fieldwork component of the study was aimed at identifying tangible remains of archaeological, historical and heritage significance. The fieldwork was undertaken by way of intensive walkthroughs of the study area. The fieldwork was conducted over several days on 23 March 2020 as well as from 8 to 13 June 2020. This fieldwork team consisted of an archaeologist (Cherene de Bruyn) and a field assistant (Pascal Snyman). The following provides a breakdown of the heritage resources identified and graded in the study area. During the survey, fourteen (14) heritage sites were identified. Of these 14 sites, ten (10) sites (WWF1-01 to WWF1-10) consist of structures (Farmhouses, Labourer houses, farm sheds and kraals), and four (4) sites contain graves (WWF1-11 to WWF1-14).

11.1.1 *Historical structures*

Two stone kraals (**WWF1-03, WWF1-04**), a labourer house (**WWF1-09**) and a contemporary shed and kraal (**WWF1-10**) were deemed NCW and is not of research potential or other cultural significance.

Four stone labourer houses (**WWF1-01, WWF1-02, WWF1-06, WWF1-07**), and two farmsteads (**WWF1-05 and WWF1-08**) have low heritage significance and low heritage sensitivity.

11.1.2 *Burial Grounds and graves*

Four (4) burial grounds (WWF1-11 to WWF1-14) were identified that may be affected by the proposed project. Graves have a high heritage significance and heritage rating of IIIA.

11.1.3 *Palaeontological Impacts*

According to the PIA conducted by Banzai Environmental (Butler, 2021) the proposed development is underlain by the Dwyka Group, Collingham Formation, Whitehill Formation, Prince Albert Formation, Rippon Formation, Fort Brown Formation (Ecca Group, Karoo Supergroup), Koonap Formation, Middleton Formation and Balfour Formation (Adelaide Subgroup, Beaufort Group, Karoo Supergroup), and Dolerite

According to the PalaeoMap of SAHRIS the Palaeontological Sensitivity of the Dwyka Group is Low, the Collingham Formation, Rippon Formation, Fort Brown Formation of the Ecca Group is

Moderate, while the Prince Albert Formation has a High and the Whitehill Formation of the Ecca has a Very High Palaeontological Sensitivity. The Adelaide Subgroup has a Very high Palaeontological Sensitivity while Dolerite is igneous in origin and thus has an Insignificant Paleontological Sensitivity (Almond et al, 2013; SAHRIS website). A 3-day site-specific field survey of the development footprint was conducted on foot and by a motor vehicle on 20 November to 23 November 2020. No visible evidence of fossiliferous outcrops was found

11.1.4 Cultural Landscape

The proposed Hamlet Wind Farm is located in an area that is sparsely populated (less than 10 people per km²) and consists of a landscape of wide-open spaces and very little development. The largest concentrations of people are located at Somerset East, Cookhouse, Bedford and Alicedale, the main towns within the region. The Hamlet WEF is located in a rural area, currently zoned as agriculture, at a distance of approximately 27km south-east of Somerset East (du Plessis, 2021). Besides the limited cultivation of crops, the study area is largely in a natural state, with mainly sheep and game farming as additional economic activities (du Plessis, 2021). Farm residences, or homesteads, dot the landscape at an irregular interval. The vegetation cover in the region is primarily grassland and low shrubland, with some forest and woodland occurring along the banks of the Little Fish and Great Fish Rivers. The proposed development envelope spans across strongly undulating plains and hills and tall hills at an average elevation of 667m above sea level (du Plessis, 2021).

The region between and surrounding Makhanda (previously known as Grahamstown) and Somerset East is sparsely populated with several farmsteads and their associated structures located on the valley floors of this hilly and mountainous region.

The farmsteads are connected through several farm roads and old historic ox-wagon routes that link the local communities to the busy towns of Makhanda and Somerset East.

The area proposed for the Hamlett Wind Farm has a low to high heritage significance. Many of the old farm buildings and stone houses in the area contain architectural elements greater than 60 years of age and fall with the general protection of the National Heritage Resources Act (25 of 1999) (NHRA). This significance of the area comprises both Local and Provincial heritage sites, consisting of palaeontological sites, rock art, burial grounds and graves, monuments and memorials, stonewalling, as well as historical structures. The significance grading of the landscape elements ranged from IIIC to I. Sufficient mitigation measures were proposed.

11.2 Impact Statement

Analysis of the various components of the HIA indicates a mitigated medium to a low negative impact on heritage resources and are expanded on below.

11.2.1 *Historical structures*

An assessment of the possible impacts of the proposed project on historical heritage resources has shown that unmitigated impacts vary between low to medium negative impacts mostly confined to the construction phase of the project. **By implementing the mitigation measures as listed in this report these impacts can be managed to low negative.**

11.2.2 *Burial Grounds and graves*

An assessment of the possible impacts of the proposed project on graves and burial grounds has shown that unmitigated impacts consist of a high negative impact mostly confined to the construction phase of the project. **By implementing the mitigation measures as listed in this report these impacts can be managed to low negative.**

11.2.3 *Palaeontology*

An assessment of the possible impacts of the proposed project on Palaeontological resources has shown that unmitigated impacts consist of a medium negative impact mostly confined to the construction phase of the project. **By implementing the mitigation measures as listed in this report these impacts can be managed to low negative.**

11.2.4 *Cultural landscape*

An assessment of the possible impacts of the proposed project on the overall cultural landscape has shown that unmitigated impacts consist of a medium negative impact mostly confined to the construction and operation phase of the project. **By implementing the mitigation measures as listed in this report these impacts can be managed to low negative.**

11.2.5 *Cumulative Impacts*

Considering the development of other WEF located next to the Hamlett Wind Farm and within the broader Grahamstown (Makanda region) the cumulative unmitigated impacts on Historical structures, Burial ground and graves as well as palaeontological resources consist of a medium negative impact mostly confined to the construction phase of the project. This could potentially result in an unacceptable loss of heritage resources. **However, by implementing the mitigation measures as listed in this report the cumulative impacts can be managed to low negative.**

11.3 Recommendations

The following mitigation measures are listed in **Table 18**.

Table 18 - Heritage management recommendations.

Area and site no.	Mitigation measures
General project area	<ul style="list-style-type: none"> • Implement a chance to find procedures in case possible heritage finds are uncovered. • A detailed “walk down” of the final approved turbine locations, access roads, powerlines and substations will be required before construction commences. • Any heritage features of significance identified during this walk down will require formal mitigation (i.e. permitting where required) or where possible a slight change in design could accommodate such resources. • A Heritage management plan (HMP) for the heritage resources needs to be compiled and approved for implementation during construction and operations where heritage features of significance are identified.
Historical Structures that were rated as NCW (WWF1-03, WWF1-04, WWF1-09 and WWF1-10)	<ul style="list-style-type: none"> • No mitigation is required
Historical Structures (WWF1-01, WWF1-02, and WWF1-05 to WWF1-06) that were rated as low heritage significance and heritage rating of IIIC.	<ul style="list-style-type: none"> • In terms of general conservation of the historical farmsteads, a 500m no-go-buffer-zone is recommended. However, considering the impact of the proposed development of the Hamlett WEF on the cultural landscape of these historical farmsteads, a 1000m no-go-buffer-zone (inclusive of the 500m no-go-buffer-zone) should be implemented. • If development occurs within 1000m the main homesteads/ “werf” need to be satisfactorily studied and recorded before impact occurs. • Recording of the buildings i.e. (a) map indicating the position and footprint of all the buildings and structures (b) photographic recording of all the buildings and structures (c) measured drawings of the floor plans of the principal buildings.
Graves and Burial grounds (EFW2-05)	<ul style="list-style-type: none"> • The site should be demarcated with a 30-meter no-go-buffer zone and that the graves should be avoided and left in situ. • A Grave Management Plan should be developed for the graves, to be implemented during the construction and operation phases (which needs approval by ECPRA). • If the site is going to be impacted and the graves need to be removed a grave relocation process for site is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be applied for with the SAHRA under the NHRA and National Health Act regulations.
Possible graves (if discovered / uncovered)	<ul style="list-style-type: none"> • When graves are discovered/uncovered the site should be demarcated with a 30-meter no-go-buffer-zone and the grave should be avoided. • Undertake archaeological monitoring at earth clearance stage. • If human remains are discovered a grave relocation process is recommended as a mitigation and management measure. This will involve the necessary social consultation and public participation process before grave relocation permits can be

Area and site no.	Mitigation measures
	<p>applied for with the ECPHRA under the NHRA and National Health Act regulations.</p> <ul style="list-style-type: none"> • If during the test excavations it is determined that the feature is not a grave, the site will then have no heritage significance and require no further mitigation.
Palaeontological finds	<ul style="list-style-type: none"> • If fossil remains are discovered during any phase of construction, either on the surface or exposed by fresh excavations the Chance Find Protocol must be implemented by the EO in charge of these developments. • Fossil discoveries ought to be protected and the EO/site manager must report to SAHRA
Cultural Landscape	<p>Mitigation:</p> <ul style="list-style-type: none"> • Mitigation measures as proposed in the HIA for the proposed Hamlett Wind Farm development that reduces negative impacts on the land use patterns and living heritage will reduce the impact of this facility on the overall load. • The mitigation measures proposed for heritage resources will reduce the negative cumulative impact on the cultural landscape and should be implemented as recommended. <p>According to the Visual impact assessment (VIA) of LOGIS by Du Plessis (2021) no mitigation of the impact on the sense of place of the region or the cultural landscape is possible as the structures will be visible regardless. However, the following general mitigation measures are proposed:</p> <ul style="list-style-type: none"> • The natural vegetation in all areas outside of the development footprint/servitude must be maintained/re-established during the planning phase. • Maintain the general appearance of the facility as a whole during the operational phase • Remove the infrastructure not required for the post-decommissioning use and rehabilitate all areas. <p>General mitigation measures for renewable energy development in areas of cultural landscape significance as proposed by Jansen and Franklin, (2021) as well as Lavin (2021) is recommended:</p> <p>Ecological:</p> <ul style="list-style-type: none"> • Species and ecosystem loss should be prevented by limiting fragmentation in the landscape, and should therefore adhere to the following general recommendations: <ul style="list-style-type: none"> • Remaining areas of endemic and endangered natural vegetation should be conserved. • High and Very High Sensitivity Ecological areas (crest lines and drainage lines), should be protected from development. • Areas of habitat are found among the rocky outcrops and contribute to the character, as well as biodiversity of the area. Care should be taken that habitats are not needlessly destroyed.

Area and site no.	Mitigation measures
	<ul style="list-style-type: none"> • Careful planning should incorporate areas for stormwater runoff where the base of the structure disturbed the natural soil. Local rocks found on the site could be used to slow stormwater (instead of concrete, or standard edge treatments), and prevent erosion that would be an unfortunate consequence that would alter the character of the site. By using rocks from site, it helps to sensitively keep to the character. • The principle of ‘tread lightly’ must be applied for any activity (and associated development requirements e.g. toilets for the construction process) should be emphasised. <p>Aesthetic:</p> <ul style="list-style-type: none"> • Encourage mitigation measures (for instance use of vegetation) to ‘embed’ or disguise the proposed structures within the surrounding tourism and agricultural landscape at ground level, road edges etc; • The continuation of the traditional use of material could be enhanced with the use of the rocks on the site as building material. This would also help to embed structures into the landscape that does not have to be standard containers that clutter the landscape. • Using material found on the site adds to the sense of place and reduces transportation costs of bringing materials to site. • Where additional infrastructure (i.e. roads) is needed, the upgrade of existing roads to accommodate the development should be the first consideration. The local material such as the rocks found within the area could be applied to address stormwater runoff from the road to prevent erosion. • Infrastructure improvement, including new roads and upgrades to the road network, should be appropriate to the rural context (scale, material etc.). • The layout of the turbines should have an emphasis on place-making, i.e. landscape-related heritage considerations, as opposed to standard infrastructure driven requirements; • Prevent the construction of new buildings/structures on visually sensitive, steep, elevated or exposed slopes, ridgelines and hillcrests. Retain the integrity of the distinctive landscape character; • Scale and massing should be sensitive to the surrounding landscape, although this is challenging with regard to the development of WEFs. • Avoid visual clutter in the landscape by intrusive signage, and the intrusion of commercial corporate development along roads • Avoid development of infrastructure (such as buildings, wind turbines and power lines), on crests or ridgelines due to the impact on the visual sensitivity of skylines. • Retain view-lines and vistas focused on prominent natural features such as mountain peaks or hills, as these are important place-making and orientating elements for experiencing the cultural landscape.

Area and site no.	Mitigation measures
	<p>Historic:</p> <ul style="list-style-type: none"> • The integrity of the historic farm werfs should be maintained and protected. • Names of routes and watercourses that refer to traditional use during the time of the hunter-gatherers and herders, as well as the colonial era, should be celebrated. • Traditional planting patterns should be protected by ensuring that existing trees are not needlessly destroyed, as these signify traces of cultural intervention in a harsh environment. These planting patterns include the trees planted around the werfs. • In some cases, remnant planting patterns (even single trees) uphold the historic character of an area. Interpretation of these landscape features as historic remnants should occur. • Mountain slopes have been used for traditional practices for many years, and care should be taken that any significant cultural sites, such as burials and veldkos/medicinal plant resources, are not disturbed. • Where the historic function of a building/site is still intact, the function has heritage value and should be protected. Please take note of the items listed below: • Surviving examples (wagon routes, outspans, and commonage), where they are owned in some public or communal way (or by a body responsible for acting in the public interest) and where they are found to be actively operating in a communal way, will have cultural and heritage value and should be enhanced and retained. • The new roads should display minimum scale designs where possible. • Maintain traditional movement patterns across rural landscapes or to places of socio-historical value. (a) Avoid privatization or the creation of barriers to traditional access routes. (b) Retain old roadways, which have been replaced by newer roads, for use as recreation trails. • Respect existing patterns, typologies and traditions of settlement-making by promoting the continuity of heritage features. These include: (a) indigenous; (b) colonial; and (c) current living heritage in the form of tangible and intangible associations to place. • Respect traditional werf settlement patterns by considering the entire werf as the component of significance. This includes the backdrop of the natural landscape against which it is sited, as well as its spatial structure. Any development that impacts the inherent character of the werf component should be discouraged. <p>Socia-Economic</p> <ul style="list-style-type: none"> • The local community around the development should benefit from job opportunities created by the proposed development and the development should not cause reduction in the economic viability of surrounding properties in excess of those offered by the

Area and site no.	Mitigation measures
	<p>development. Short-term job opportunities at the expense of long term economic benefit and local employment opportunities must be prevented.</p> <ul style="list-style-type: none"> • Sheep, cattle or game farming should be allowed to continue below the wind turbines, or be rehabilitated to increase biodiversity in the area. • Care should be taken to reduce visual impact from surrounding tourism areas, by following the recommendations included in the VIA.

11.4 Findings

The assessment of the possible impacts on the archaeological, historical and palaeontological resources has shown a Low impact from the WEF project after mitigation measures. It is further considered that the project can have a potential positive influence on such resources in the region when the proposed conservation initiative from the project considers such resources as part of a larger development strategy.

The assessment of the Cultural Landscape (CL) indicated that the project will have a significant Moderate to High impact on the CL. The general mitigation measures for renewable energy development in areas of cultural landscape significance as proposed by Jansen and Franklin, (2021) as well as Lavin (2021) will still result in a marginal reduction of impact. However, the size and bulk of the turbines in the landscape will unlikely be totally mitigatable.

It must further be considered that the addition of the infrastructure of the WEF will constitute an additional layer to the cultural landscape and must be considered as such within a gazetted REDZ area. Through the implementation of the economically feasible recommendations as set out in the CLA and contained in this report it will be possible to preserve older layers of the cultural landscape and in some cases even enhance them through consideration such as the use of older name places in the naming of infrastructure and enhancing local heritage through the incorporation of such structures in project conservation initiatives to name a few.

Analysis of the findings of the SEIA for this project further reveals that the economic benefit for the region and the overall energy needs such project addresses outweighs the need for conservation of cultural resources at all costs. The economic benefit for the region and the overall energy needs such a project address outweigh the need for the exclusion of the WEF to conserve cultural resources at all costs. Especially where a project is situated within a gazetted REDZ area.

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Heritage Assessment Methodology

The applicable maps, tables and figures, are included as stipulated in the NHRA (no 25 of 1999), the NEMA (no 107 of 1998). The HIA process consisted of three steps:

Step I – Literature Review: The background information to the field survey relies greatly on the Heritage Background Research.

Step II – Physical Survey: A physical survey was conducted by vehicle through the proposed project area by a qualified heritage specialist. The survey was conducted over one day (21 August 2019), aimed at locating and documenting sites falling within and adjacent to the proposed development footprint.

Step III – The final step involved the recording and documentation of relevant archaeological resources, the assessment of resources in terms of the HIA criteria and report writing, as well as mapping and constructive recommendations.

The significance of heritage sites was based on four main criteria:

- Site integrity (i.e. primary vs. secondary context),
- Amount of deposit, range of features (e.g., stonewalling, stone tools and enclosures),
- Density of scatter (dispersed scatter)
 - Low - <10/50m²
 - Medium - 10-50/50m²
 - High - >50/50m²
- Uniqueness; and
- Potential to answer present research questions.

Management actions and recommended mitigation, which will result in a reduction in the impact on the sites, will be expressed as follows:

A - No further action necessary;

B - Mapping of the site and controlled sampling required;

C - No-go or relocate development activity position;

D - Preserve site, or extensive data collection and mapping of the site; and

E - Preserve site.

Impacts on these sites by the development will be evaluated as follows:

Site Significance

Site significance classification standards use is based on the heritage classification of s3 in the NHRA and developed for implementation keeping in mind the grading system approved by SAHRA for archaeological impact assessments. The update classification and rating system as developed by Heritage Western Cape (2016) is implemented in this report

Site significance classification standards prescribed by the Heritage Western Cape Guideline (2016), were used for the purpose of this report (Error! Reference source not found. and Error! Reference source not found.).

Table A 1: Rating system for archaeological resources

Grading	Description of Resource	Examples of Possible Management Strategies	Heritage Significance
I	Heritage resources with qualities so exceptional that they are of special national significance. Current examples: Langebaanweg (West Coast Fossil Park), Cradle of Humankind	May be declared as a National Heritage Site managed by SAHRA. Specific mitigation and scientific investigation can be permitted in certain circumstances with sufficient motivation.	Highest Significance
II	Heritage resources with special qualities which make them significant, but do not fulfil the criteria for Grade I status. Current examples: Blombos, Paternoster Midden.	May be declared as a Provincial Heritage Site managed by ECPHRA. Specific mitigation and scientific investigation can be permitted in certain circumstances with sufficient motivation.	Exceptionally High Significance
III	Heritage resources that contribute to the environmental quality or cultural significance of a larger area and fulfils one of the criteria set out in section 3(3) of the Act but that does not fulfil the criteria for Grade II status. Grade III sites may be formally protected by placement on the Heritage Register.		
IIIA	Such a resource must be an excellent example of its kind or must be sufficiently rare. Current examples: Varschedrift; Peers Cave; Brobartia Road Midden at Bettys Bay	Resource must be retained. Specific mitigation and scientific investigation can be permitted in certain circumstances with sufficient motivation.	High Significance
IIIB	Such a resource might have similar significances to those of a Grade III A resource, but to a lesser degree.	Resource must be retained where possible where not possible it must be fully investigated and/or mitigated.	Medium Significance
IIIC	Such a resource is of contributing significance.	Resource must be satisfactorily studied before impact. If the recording already done (such as in an HIA or permit application) is not sufficient, further recording or even mitigation may be required.	Low Significance
NCW	A resource that, after appropriate investigation, has been determined to not have enough heritage significance to be retained as part of the National Estate.	No further actions under the NHRA are required. This must be motivated by the applicant or the consultant and approved by the authority.	No research potential or other cultural significance

Table A 2: Rating system for built environment resources

Grading	Description of Resource	Examples of Possible Management Strategies	Heritage Significance
I	Heritage resources with qualities so exceptional that they are of special national significance. Current examples: Robben Island	May be declared as a National Heritage Site managed by SAHRA.	Highest Significance
II	Heritage resources with special qualities which make them significant in the context of a province or region, but do not fulfil the criteria for Grade I status. Current examples: St George's Cathedral, Community House	May be declared as a Provincial Heritage Site managed by ECHPHRA	Exceptionally High Significance
II	Such a resource contributes to the environmental quality or cultural significance of a larger area and fulfils one of the criteria set out in section 3(3) of the Act but that does not fulfil the criteria for Grade II status. Grade III sites may be formally protected by placement on the Heritage Register.		
IIIA	Such a resource must be an excellent example of its kind or must be sufficiently rare. These are heritage resources which are significant in the context of an area.	This grading is applied to buildings and sites that have sufficient intrinsic significance to be regarded as local heritage resources; and are significant enough to warrant that any alteration, both internal and external, is regulated. Such buildings and sites may be representative, being excellent examples of their kind, or may be rare. In either case, they should receive maximum protection at local level.	High Significance
IIIB	Such a resource might have similar significances to those of a Grade III A resource, but to a lesser degree. These are heritage resources which are significant in the context of a townscape, neighbourhood, settlement or community.	Like Grade IIIA buildings and sites, such buildings and sites may be representative, being excellent examples of their kind, or may be rare, but less so than Grade IIIA examples. They would receive less stringent protection than Grade IIIA buildings and sites at local level.	Medium Significance
IIIC	Such a resource is of contributing significance to the environs. These are heritage resources which are significant in the context of a streetscape or direct neighbourhood.	This grading is applied to buildings and/or sites whose significance is contextual, i.e. in large part due to its contribution to the character or significance of the environs. These buildings and sites should, as a consequence, only be regulated if the significance of the environs is sufficient to warrant protective measures, regardless of whether the site falls within a Conservation or Heritage Area. Internal alterations should not necessarily be regulated.	Low Significance
NCW	A resource that, after appropriate investigation, has been determined to not have enough	No further actions under the NHRA are required. This must be motivated by the applicant and	No research potential or other cultural significance

Grading	Description of Resource	Examples of Possible Management Strategies	Heritage Significance
	heritage significance to be retained as part of the National Estate.	approved by the authority. Section 34 can even be lifted by ECPHRA for structures in this category if they are older than 60 years.	

WOUTER FOURIE

Professional Heritage Specialist and Professional Archaeologist and Director PGS Heritage

Summary of Experience

Specialised expertise in Archaeological Mitigation and excavations, Cultural Resource Management and Heritage Impact Assessment Management, Archaeology, Anthropology, Applicable survey methods, Fieldwork and project management, Geographic Information Systems, including *inter alia* -

Involvement in various grave relocation projects (some of which relocated up to 1000 graves) and grave “rescue” excavations in the various provinces of South Africa

Involvement with various Heritage Impact Assessments, within South Africa, including -

- Archaeological Walkdowns for various projects
- Phase 2 Heritage Impact Assessments and EMPs for various projects
- Heritage Impact Assessments for various projects
 - Iron Age Mitigation Work for various projects, including archaeological excavations and monitoring
 - Involvement with various Heritage Impact Assessments, outside South Africa, including -
- Archaeological Studies in Democratic Republic of Congo
- Heritage Impact Assessments in Mozambique, Botswana and DRC
- Grave Relocation project in DRC

Key Qualifications

BA [Hons] (Cum laude) - Archaeology and Geography - 1997

BA - Archaeology, Geography and Anthropology - 1996

Professional Archaeologist - Association of Southern African Professional Archaeologists (ASAPA) - Professional Member

Accredited Professional Heritage Specialist – Association of Professional Heritage Practitioners (APHP)

CRM Accreditation (ASAPA) -

- Principal Investigator - Grave Relocations
- Field Director – Iron Age
- Field Supervisor – Colonial Period and Stone Age
- Accredited with Amafa KZN

Key Work Experience

2003- current - Director – Professional Grave Solutions (Pty) Ltd

2007 – 2008 - Project Manager – Matakoma-ARM, Heritage Contracts Unit, University of the Witwatersrand

2005-2007 - Director – Matakoma Heritage Consultants (Pty) Ltd

2000-2004 - CEO– Matakoma Consultants

1998-2000 - Environmental Coordinator – Randfontein Estates Limited. Randfontein, Gauteng

1997-1998 - Environmental Officer – Department of Minerals and Energy. Johannesburg, Gauteng

Worked on various heritage projects in the SADC region including, Botswana, Mozambique, Malawi, Mauritius, Zimbabwe and the Democratic Republic of the Congo

PROFESSIONAL CURRICULUM FOR CHERENE DE BRUYN

Professional Archaeologist for PGS Heritage

Key Qualifications

2016-2017	MA in Archaeology University College London, United Kingdom
2015	BSC Honours in Physical Anthropology, University of Pretoria, South Africa
2013	BA Honours in Archaeology University of Pretoria, South Africa
2010-2012	BA (General) University of Pretoria, South Africa Major subjects: Archaeology and Anthropology

Professional Qualifications:

Association of Southern African Professional Archaeologists - Professional Member (#432)

International Association for Impact Assessment South Africa - Member (#6082)

Association of Southern African Professional Archaeologists - CRM Accreditation

- Principal Investigator: Grave relocation
- Field Director: Colonial period archaeology, Iron Age archaeology
- Field Supervisor: Rock art, Stone Age archaeology
- Laboratory Specialist: Human Skeletal Remains

Languages:

Afrikaans & English

Summary of Experience

Expertise in Heritage Impact Assessment Management, Historical and Archival Research, Archaeology, Physical Anthropology, Grave Relocations, Fieldwork, Geographic Information Systems and Project Management including *inter alia* -

Involvement in various grave relocation projects

- Grave exhumation, test excavations and grave “rescue” excavations in the various provinces of South Africa.
- Permit applications with SAHRA BGG and AMAFA for grave relocation projects.

Involvement with various Heritage Impact Assessments,

- Heritage Impact Assessments and Management for various projects within Eastern Cape, Free State, Gauteng, KwaZulu-Natal, Limpopo, Mpumalanga, Northern Cape, North West and Western Cape Province.
- Archaeological Walkdowns for various projects.
- Desktop, archival and heritage screening for projects.

EMPLOYMENT SUMMARY:

Positions Held

- 2020 – to date: Archaeologist - PGS Heritage
- 2019: Manager of the NGT ESHS Heritage Department – NGT Holdings
- 2018 – 2019: Archaeologist and Heritage Consultant – NGT Holdings
- 2015-2016: Archaeological Contractor - BA3G, University of Pretoria
- 2014 – 2015: DST-NRF Archaeological Intern, FARC, University of Pretoria

ELIZE BUTLER
Palaeontologist for Banzai Environmental

PROFESSION: Palaeontologist

YEARS' EXPERIENCE: 26 years in
Palaeontology

EDUCATION:

B.Sc Botany and Zoology, 1988
University of the Orange Free State

B.Sc (Hons) Zoology, 1991
University of the Orange Free State

Management Course, 1991
University of the Orange Free State

M. Sc. *Cum laude* (Zoology), 2009
University of the Free State

Dissertation title: The postcranial skeleton of the Early Triassic non-mammalian Cynodont *Galesaurus planiceps*: implications for biology and lifestyle

Registered as a PhD fellow at the Zoology Department of the UFS

2013 to current

Dissertation title: A new gorgonopsian from the uppermost *Daptocephalus Assemblage Zone*, in the Karoo Basin of South Africa

MEMBERSHIP

Palaeontological Society of South Africa (PSSA) 2006-currently

EMPLOYMENT HISTORY

Part-time Laboratory assistant	Department of Zoology & Entomology University of the Free State Zoology 1989- 1992
Part-time laboratory assistant	Department of
Virology	University of the Free State Zoology 1992
Research Assistant	National Museum, Bloemfontein 1993 – 1997
Principal Research Assistant	National
Museum, Bloemfontein	
and Collection Manager	
1998–currently	

TECHNICAL REPORTS

E. Butler. 2019. Palaeontological Desktop Assessment of the proposed Westrand Strengthening Project Phase II.

E. Butler. 2019. Palaeontological Field Assessment for the proposed Sirius 3 Photovoltaic Solar Energy Facility near Upington, Northern Cape Province

E. Butler. 2019. Palaeontological Field Assessment for the proposed Sirius 4 Photovoltaic Solar Energy Facility near Upington, Northern Cape Province

E. Butler. 2019. Palaeontological Field Assessment for Heuningspruit PV 1 Solar Energy Facility near Koppies, Ngwathe Local Municipality, Free State Province.

E. Butler. 2019. Palaeontological Field Assessment for the Moeding Solar Grid Connection, North West Province.

E. Butler. 2019. Recommended Exemption from further Palaeontological studies for the Proposed Agricultural Development on Farms 1763, 2372 And 2363, Kakamas South Settlement, Kai! Garib Municipality, Mgcawu District Municipality, Northern Cape Province.

E. Butler. 2019. Recommended Exemption from further Palaeontological studies: of Proposed Agricultural Development, Plot 1178, Kakamas South Settlement, Kai! Garib Municipality

E. Butler. 2019. Palaeontological Desktop Assessment for the Proposed Waste Rock Dump Project at Tshipi Borwa Mine, near Hotazel, Northern Cape Province:

E. Butler. 2019. Palaeontological Exemption Letter for the proposed DMS Upgrade Project at the Sishen Mine, Gamagara Local Municipality, Northern Cape Province

E. Butler. 2019. Palaeontological Desktop Assessment of the proposed Integrated Environmental Authorisation process for the proposed Der Brochen Amendment project, near Groblershoop, Limpopo

E. Butler. 2019. Palaeontological Desktop Assessment of the proposed updated Environmental Management Programme (EMPr) for the Assmang (Pty) Ltd Black Rock Mining Operations, Hotazel, Northern Cape

E. Butler. 2019. Palaeontological Desktop Assessment of the proposed Kriel Power Station Lime Plant Upgrade, Mpumalanga Province

E. Butler. 2019. Palaeontological Impact Assessment for the proposed Kangala Extension Project Near Delmas, Mpumalanga Province.

E. Butler. 2019. Palaeontological Desktop Assessment for the proposed construction of an iron/steel smelter at the Botshabelo Industrial area within the Mangaung Metropolitan Municipality, Free State Province.

E. Butler. 2019. Recommended Exemption from further Palaeontological studies for the proposed agricultural development on farms 1763, 2372 and 2363, Kakamas South settlement, Kai! Garib Municipality, Mgcawu District Municipality, Northern Cape Province.

E. Butler. 2019. Recommended Exemption from further Palaeontological Studies for Proposed formalisation of Gamakor and Noodkamp low cost Housing Development, Keimoes, Gordonia Rd, Kai !Garib Local Municipality, ZF Mgcawu District Municipality, Northern Cape Province.

E. Butler. 2019. Recommended Exemption from further Palaeontological Studies for proposed formalisation of Blaauwskop Low Cost Housing Development, Kenhardt Road, Kai !Garib Local Municipality, ZF Mgcawu District Municipality, Northern Cape Province.

E. Butler. 2019. Palaeontological Desktop Assessment of the proposed mining permit application for the removal of diamonds alluvial and diamonds kimberlite near Windsorton on a certain portion of Farm Zoelen's Laagte 158, Registration Division: Barkly Wes, Northern Cape Province.

E. Butler. 2019. Palaeontological Desktop Assessment of the proposed Vedanta Housing Development, Pella Mission 39, Khâi-Ma Local Municipality, Namakwa District Municipality, Northern Cape.

- E. Butler. 2019.** Palaeontological Desktop Assessment for The Proposed 920 Kwp Groenheuwel Solar Plant Near Augrabies, Northern Cape Province
- E. Butler. 2019.** Palaeontological Desktop Assessment for the establishment of a Super Fines Storage Facility at Amandelbult Mine, Near Thabazimbi, Limpopo Province
- E. Butler. 2019.** Palaeontological Impact Assessment for the proposed Sace Lifex Project, Near Emalahleni, Mpumalanga Province
- E. Butler. 2019.** Palaeontological Desktop Assessment for the proposed Rehau Fort Jackson Warehouse Extension, East London
- E. Butler. 2019.** Palaeontological Desktop Assessment for the proposed Environmental Authorisation Amendment for moving 3 Km Of the Merensky-Kameni 132KV Powerline
- E. Butler. 2019.** Palaeontological Impact Assessment for the proposed Umsobomvu Solar PV Energy Facilities, Northern and Eastern Cape
- E. Butler. 2019.** Palaeontological Desktop Assessment for six proposed Black Mountain Mining Prospecting Right Applications, without Bulk Sampling, in the Northern Cape.
- E. Butler. 2019.** Palaeontological field Assessment of the Filling Station (Rietvlei Extension 6) on the Remaining Portion of Portion 1 of the Farm Witkoppies 393JR east of the Rietvleidam Nature Reserve, City of Tshwane, Gauteng
- E. Butler. 2019.** Palaeontological Desktop Assessment Of The Proposed Upgrade Of The Vaal Gamagara Regional Water Supply Scheme: Phase 2 And Groundwater Abstraction
- E. Butler. 2019.** Palaeontological Desktop Assessment Of The Expansion Of The Jan Kempdorp Cemetry On Portion 43 Of Farm Guldenskat 36-Hn, Northern Cape Province
- E. Butler. 2019.** Palaeontological Desktop Assessment of the Proposed Residential Development On Portion 42 Of Farm Geldunskat No 36 In Jan Kempdorp, Phokwane Local Municipality, Northern Cape Province
- E. Butler. 2019.** Palaeontological Impact Assessment of the proposed new Township Development, Lethabo Park, on Remainder of Farm Roodepan No 70, Erf 17725 And Erf 15089, Roodepan Kimberley, Sol Plaatjies Local Municipality, Frances Baard District Municipality, Northern Cape
- E. Butler. 2019.** Palaeontological Protocol for Finds for the proposed 16m WH Battery Storage System in Steinkopf, Northern Cape Province

- E. Butler.** 2019. Palaeontological Exemption Letter of the proposed 4.5WH Battery Storage System near Midway-Pofadder, Northern Cape Province
- E. Butler.** 2019. Palaeontological Exemption Letter of the proposed 2.5ml Process Water Reservoir at Gloria Mine, Black Rock, Hotazel, Northern Cape
- E. Butler.** 2019. Palaeontological Desktop Assessment for the Establishment of a Super Fines Storage Facility at Gloria Mine, Black Rock Mine Operations, Hotazel, Northern Cape:
- E. Butler.** 2019. Palaeontological Desktop Assessment for the Proposed New Railway Bridge, and Rail Line Between Hotazel And The Gloria Mine, Northern Cape Province
- E. Butler.** 2019. Palaeontological Exemption Letter Of The Proposed Mixed Use Commercial Development On Portion 17 Of Farm Boegoeberg Settlement Number 48, !Kheis Local Municipality In The Northern Cape Province
- E. Butler.** 2019. Palaeontological Desktop Assessment of the Proposed Diamond Mining Permit Application Near Kimberley, Sol Plaatjies Municipality, Northern Cape Province
- E. Butler.** 2019. Palaeontological Desktop Assessment of the Proposed Diamonds (Alluvial, General & In Kimberlite) Prospecting Right Application near Postmasburg, Registration Division; Hay, Northern Cape Province
- E. Butler.** 2019. Palaeontological Desktop Assessment of the proposed diamonds (alluvial, general & in kimberlite) prospecting right application near Kimberley, Northern Cape Province.
- E. Butler.** 2019. Palaeontological Phase 1 Impact Assessment of the proposed upgrade of the Vaal Gamagara regional water supply scheme: Phase 2 and groundwater abstraction
- E. Butler.** 2019. Palaeontological Desktop Assessment of the proposed seepage interception drains at Duvha Power Station, Emalaheni Municipality, Mpumalanga Province
- E. Butler.** 2019. Palaeontological Desktop Assessment letter for the Proposed PV Solar Facility at the Heineken Sedibeng Brewery, near Vereeniging, Gauteng.
- E. Butler.** 2019. Palaeontological Phase 1 Assessment letter for the Proposed PV Solar Facility at the Heineken Sedibeng Brewery, near Vereeniging, Gauteng.
- E. Butler.** 2019. Palaeontological field Assessment for the Proposed Upgrade of the Kolomela Mining Operations, Tsantsabane Local Municipality, Siyanda District Municipality, Northern Cape Province, Northern Cape

E. Butler. 2019. Palaeontological Desktop Assessment of the proposed feldspar prospecting rights and mining application on portion 4 and 5 of the farm Rozynen 104, Kakamas South, Kail Garib Municipality, Zf Mgcawu District Municipality, Northern Cape

E. Butler. 2019. Palaeontological Phase 1 Field Assessment of the proposed Summerpride Residential Development and Associated Infrastructure on Erf 107, Buffalo City Municipality, East London.

E. Butler. 2019. Palaeontological Desktop Impact Assessment for the proposed re-commission of the Old Balgray Colliery near Dundee, Kwazulu Natal.

E. Butler. 2019. Palaeontological Phase 1 Impact Assessment for the Proposed Re-Commission of the Old Balgray Colliery near Dundee, Kwazulu Natal.

E. Butler. 2019. Palaeontological Desktop Assessment for the Proposed Environmental Authorisation and Amendment Processes for Elandsfontein Colliery.

E. Butler. 2019. Palaeontological Impact Assessment and Protocol for Finds of a Proposed New Quarry on Portion 9 (of 6) of the farm Mimosa Glen 885, Bloemfontein, Free State Province

E. Butler. 2019. Palaeontological Impact Assessment and Protocol for Finds of a proposed development on Portion 9 and 10 of the Farm Mimosa Glen 885, Bloemfontein, Free State Province

E. Butler. 2019. Palaeontological Exemption Letter for the proposed residential development on the Remainder of Portion 1 of the Farm Strathearn 2154 in the Magisterial District of Bloemfontein, Free State

E. Butler. 2019. Palaeontological Field Assessment for the Proposed Nigel Gas Transmission Pipeline Project in the Nigel Area of the Ekurhuleni Metropolitan Municipality, Gauteng Province

E. Butler. 2019. Palaeontological Desktop Assessment for five Proposed Black Mountain Mining Prospecting Right Applications, Without Bulk Sampling, in the Northern Cape.

E. Butler. 2019. Palaeontological Desktop Assessment for the Proposed Environmental Authorisation and an Integrated Water Use Licence Application for the Reclamation of the Marievale Tailings Storage Facilities, Ekurhuleni Metropolitan Municipality - Gauteng Province.

E. Butler. 2019. Palaeontological Impact Assessment for the Proposed Sace Lifex Project, near Emalahleni, Mpumalanga Province.

E. Butler. 2019. Palaeontological Desktop Assessment for the proposed Golfview Colliery near Ermelo, Msukaligwa Local Municipality, Mpumalanga Province

- E. Butler.** 2019. Palaeontological Desktop Assessment for the Proposed Kangra Maquasa Block C Mining development near Piet Retief, in the Mkhondo Local Municipality within the Gert Sibande District Municipality
- E. Butler.** 2019. Palaeontological Desktop Assessment for the Proposed Amendment of the Kusipongo Underground and Opencast Coal Mine in Support of an Environmental Authorization and Waste Management License Application.
- E. Butler.** 2019. Palaeontological Exemption Letter of the Proposed Mamatwan Mine Section 24g Rectification Application, near Hotazel, Northern Cape Province
- E. Butler.** 2020. Palaeontological Field Assessment for the Proposed Environmental Authorisation and Amendment Processes for Elandsfontein Colliery
- E. Butler.** 2020. Palaeontological Desktop Assessment for the Proposed Extension of the South African Nuclear Energy Corporation (Necsa) Pipe Storage Facility, Madibeng Local Municipality, North West Province
- E. Butler.** 2020. Palaeontological Field Assessment for the Proposed Piggery on Portion 46 of the Farm Brakkefontien 416, Within the Nelson Mandela Bay Municipality, Eastern Cape
- E. Butler.** 2020. Palaeontological field Assessment for the proposed Rietfontein Housing Project as part of the Rapid Land Release Programme, Gauteng Province Department of Human Settlements, City of Johannesburg Metropolitan Municipality
- E. Butler.** 2020. Palaeontological Desktop Assessment for the Proposed Choje Wind Farm between Grahamstown and Somerset East, Eastern Cape
- E. Butler.** 2020. Palaeontological Desktop Assessment of the Proposed Prospecting Right Application for the Prospecting of Diamonds (Alluvial, General & In Kimberlite), Combined with A Waste License Application, Registration Division: Gordonias And Kenhardt, Northern Cape Province
- E. Butler.** 2020. Palaeontological Impact Assessment for the Proposed Clayville Truck Yard, Ablution Blocks and Wash Bay to be Situated on Portion 55 And 56 Of Erf 1015, Clayville X11, Ekurhuleni Metropolitan Municipality, Gauteng Province
- E. Butler.** 2020. Palaeontological Desktop Assessment for the Proposed Hartebeesthoek Residential Development
- E. Butler.** 2020. Palaeontological Desktop Assessment for the Proposed Mooiplaats Educational Facility, Gauteng Province

E. Butler. 2020. Palaeontological Impact Assessment for the Proposed Monument Park Student Housing Establishment

E. Butler. 2020. Palaeontological Field Assessment for the Proposed Standerton X10 Residential and Mixed-Use Developments, Lekwa Local Municipality Standerton, Mpumalanga Province

E. Butler. 2020. Palaeontological Field Assessment for the Rezoning and Subdivision of Portion 6 Of Farm 743, East London

E. Butler. 2020. Palaeontological Field Assessment for the Proposed Matla Power Station Reverse Osmosis Plant, Mpumalanga Province

CONFERENCE CONTRIBUTIONS

NATIONAL

PRESENTATION

Butler, E., Botha-Brink, J., and F. Abdala. A new gorgonopsian from the uppermost *Dicynodon Assemblage Zone*, Karoo Basin of South Africa.18 the Biennial conference of the PSSA 2014.Wits, Johannesburg, South Africa.

INTERNATIONAL

Attended the Society of Vertebrate Palaeontology 73th Conference in Los Angeles, America. October 2012.

CONFERENCES: POSTER PRESENTATION

NATIONAL

Butler, E., and J. Botha-Brink. Cranial skeleton of *Galesaurus planiceps*, implications for biology and lifestyle. University of the Free State Seminar Day, Bloemfontein. South Africa. November 2007.

Butler, E., and J. Botha-Brink. Postcranial skeleton of *Galesaurus planiceps*, implications for biology and lifestyle.14th Conference of the PSSA, Matjesfontein, South Africa. September 2008:

Butler, E., and J. Botha-Brink. The biology of the South African non-mammaliaform cynodont *Galesaurus planiceps*.15th Conference of the PSSA, Howick, South Africa. August 2008.

INTERNATIONAL VISITS

Natural History Museum, London

July 2008

Paleontological Institute, Russian Academy of Science, Moscow

November 2014

Letter - Cultural Landscape Assessment in REDZ Areas



CTS HERITAGE

18 June 2021

Jo-Anne Thomas
Savannah Environmental

Dear Ms Thomas,

RE: CULTURAL LANDSCAPE ASSESSMENT AS PART OF THE HERITAGE IMPACT ASSESSMENT PROCESS IN RENEWABLE ENERGY DEVELOPMENT ZONES

Legislative Mandate

The National Heritage Resources Act (NHRA, Act 25 of 1999) primarily employs two mechanisms to ensure the effective conservation and management of significant heritage resources. These mechanisms are the Formal Protections detailed in Part I of Chapter II of the NHRA and the General Protections detailed in Part II of Chapter II of the NHRA. Formal Protections include the declaration of National and Provincial Heritage Sites, Heritage Areas as well as the establishment of the Heritage Register. The General Protections include permitting requirements for alterations to structures that are older than 60 years (Section 34) and permit requirements for impacts to archaeological and palaeontological heritage resources (Section 35), amongst others.

Applications for renewable energy developments, in general, fall under section 38 of the NHRA, a section that falls within Part II of Chapter II - the General Protections. This section of the heritage legislation is triggered by developments of a certain scale, size or nature such as the change of character to a site exceeding 5000m². Section 38(8) of the NHRA specifically deals with such developments that also trigger other legislation that requires an assessment of impacts, for example, in terms of NEMA.

Section 38(8) of the NHRA requires that any assessment of impacts from such developments also include an assessment of impacts to heritage resources that satisfies certain criteria detailed in section 38(3) of the NHRA. Section 38(8) also requires heritage authorities to comment on such heritage impact assessments, and that the relevant decision-making authorities (such as the DEFF) take this comment into consideration prior to issuing the authorisation (such as the Environmental Authorisation or equivalent). This is to ensure that any significant heritage resources that may be impacted by the proposed development are identified and appropriately managed or mitigated against impacts prior to authorisation.

Cedar Tower Services (Pty) Ltd t/a CTS Heritage
Reg: 2013/211135/07 VAT No: 4160278950
34 Harries Street, Plumstead, Cape Town, 7945
Tel: +27 (0)87 073 5739 Email: info@ctsheritage.com Web: www.ctsheritage.com



CTS HERITAGE

In terms of section 38(3) of the NHRA, it is required that impacts to all heritage resources be assessed in an HIA. "All heritage resources" includes archaeological heritage, palaeontological heritage, the built environment as well as the cultural landscape more broadly.

Cultural Landscape

According to Jensen (2020), "The idea of a cultural landscape is fundamental. The term may be given varied meanings, yet, at its core, it unites the products of so-called 'natural' ecological processes and phenomena on the one hand, and the products emerging from the processes of transformation of the 'natural' site by people in constructing their 'built' world, on the other. Any area consists of many sites, most of which have been inhabited by people for thousands of years. These places have been moulded, shaped and changed both by natural processes and by people engaged in adapting the environment to their pursuits.

Cultural landscapes are what one generation inherits from another: in them are embedded values held dear by those gone by. It is the duty and task of any one generation to evaluate that which is inherited and to take appropriate decisions for the future: not only from the perspective of the short-term and how it may be useful to them in a selfish way, but also from a more inclusive communal and longer-term view. It may be considered human nature to act with self-interest, hence the need for government ideals and guidance, such as an appropriate planning and heritage resources control system whereby the longer term and the public good may be addressed responsibly."

According to the African Landscape Convention "Landscapes are the result of unique combinations of biophysical, cultural and social processes evolving over time and interwoven with memory, perception and tradition. They include land, water systems, marine areas and island configurations and play a vital role in human nurture, fulfilment and in shaping individual and collective identity.

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Cedar Tower Services (Pty) Ltd t/a CTS Heritage
Reg: 2013/211135/07 VAT No: 4160278950
34 Harries Street, Plumstead, Cape Town, 7945
Tel: +27 (0)87 073 5739 Email: info@ctsheritage.com Web: www.ctsheritage.com



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communities includes the preservation of common and distinctive heritage, improving ecological health and well-being, increasing the productive capabilities of land and encouraging sustainable approaches to development and change. This approach aims to maintain important life-supporting functions such as water quality and biodiversity, while providing for the appropriate utilisation of landscapes for sustainable social, cultural, and economic development.

The importance of the deep and fundamental relationship that indigenous and other peoples of the African continent have with the natural world must be acknowledged and respected. These attitudes and beliefs should influence and inform the ways in which we approach the protection, planning, design and management of our landscapes. The scope and nature of the pressures on the landscape continue to increase and a comprehensive set of principles is now required to counter these pressures and to support the diverse aspects of contemporary landscape practice in our Region. This Landscape Convention sits within a global context and framework that comprises a series of National Landscape Charters and Conventions coordinated through the International Federation of Landscape Architects (IFLA). Other significant statements about our approaches and attitudes to the landscape include, but are not limited to, the ICOMOS Charter (1964), the European Landscape Convention (2001), the Florence Declaration (2012), the Matera Resolution (2013) and the IFLA Global Accord (2017)."

REDZ Areas

In an effort to encourage renewable energy development in South Africa, the DFFE has gazetted a number of Renewable Energy Development Zones (REDZ) in which the development of renewable energy developments are actively encouraged through various incentive mechanisms. These REDZ areas were identified following the completion of a Strategic Environment Assessment (SEA) process. While the SEA process conducted did attempt to take impacts to archaeological and palaeontological heritage resources into consideration given the data available at the time, there is insufficient evidence that the SEA process looked at the identification of significant cultural landscapes in the identification of these REDZ areas.

As such, we are left in a position where broad impacts to cultural landscape heritage from renewable energy development are required to be assessed on a project-by-project basis in the HIA process. This can be unsatisfactory as REDZ areas have been gazetted for renewable energy development and the opportunity to take a broader, guiding approach to handling cultural landscapes in REDZ areas was not realised.

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As indicated above, the cultural landscape is defined as the interaction between people and the places that they have occupied and impacted. In some places in South Africa, the cultural landscape can be more than 1 million years old where we find evidence of Early Stone Age archaeology (up to 2 million years old), Middle Stone Age archaeology (up to 200 000 years old), Later Stone Age archaeology (up to 20 000 years old), evidence of indigenous herder populations (up to 2000 years old) as well as evidence of colonial frontier settlement (up to 300 years old) and more recent agricultural layers.

Modern interventions into such landscapes, such as renewable energy development, constitute an additional layer onto the cultural landscape which must be acceptable in REDZ areas. The primary risk in terms of negative impact to the cultural landscape resulting from renewable energy development lies in the eradication of older layers that make up the cultural landscape. There are various ways that such impact can be mitigated.

Example

For example, Jensen (2020) recommends the following as general guidelines for renewable energy development in areas of cultural landscape significance:

Ecological Criteria:

- Species and ecosystem loss should be prevented by limiting fragmentation in the landscape, and should therefore adhere to the following general recommendations:
 - o Remaining areas of endemic and endangered natural vegetation should be conserved.
 - o High and Very High Sensitivity Ecological areas (crest lines and drainage lines), should be protected from development
 - o Areas of habitat are found among the rocky outcrops and contribute to the character, as well as biodiversity of the area. Care should be taken that habitats are not needlessly destroyed.
- Careful planning should incorporate areas for stormwater runoff where the base of the structure disturbed the natural soil. Local rocks found on the site could be used to slow stormwater (instead of concrete, or standard edge treatments), and prevent erosion that would be an unfortunate consequence that would alter the character of the site. By using rocks from site, it helps to sensitively keep to the character.

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- The principle of 'tread lightly' must be applied for any activity (and associated development requirements e.g. toilets for the construction process) and should be emphasised.

Aesthetic Criteria

- Encourage mitigation measures (for instance use of vegetation) to 'embed' or disguise the proposed structures within the surrounding tourism and agricultural landscape at ground level, road edges etc;
- The continuation of the traditional use of material could be enhanced with the use of the rocks on the site as building material. This would also help to embed structures into the landscape that does not have to be standard containers that clutter the landscape.
- Using material found on the site adds to the sense of place and reduces transportation costs of bringing materials to site.
- Where additional infrastructure (i.e. roads) is needed, the upgrade of existing roads to accommodate the development should be the first consideration. The local material such as the rocks found within the area could be applied to address stormwater runoff from the road to prevent erosion.
- Infrastructure improvement, including new roads and upgrades to the road network, should be appropriate to the rural context (scale, material etc.).
- The layout of the turbines should have an emphasis on place-making, i.e. landscape-related heritage considerations, as opposed to standard infrastructure driven requirements;
- Prevent the construction of new buildings/structures on visually sensitive, steep, elevated or exposed slopes, ridgelines and hillcrests. Retain the integrity of the distinctive landscape character;
- Scale and massing should be sensitive to the surrounding landscape, although this is challenging with regard to the development of WEFs.
- Avoid visual clutter in the landscape by intrusive signage, and the intrusion of commercial, corporate development along roads
- Avoid development of infrastructure (such as buildings, wind turbines and power lines), on crests or ridgelines due to the impact on the visual sensitivity of skylines.
- Retain view-lines and vistas focused on prominent natural features such as mountain peaks or hills, as these are important place-making and orientating elements for experiencing the cultural landscape.

Historic Criteria

- The integrity of the historic farm werfs should be maintained and protected.

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- Names of routes and watercourses that refer to traditional use during the time of the hunter-gatherers and herders, as well as the colonial era in the Cape, should be celebrated.
- Traditional planting patterns should be protected by ensuring that existing trees are not needlessly destroyed, as these signify traces of cultural intervention in a harsh environment. These planting patterns include the trees planted around the werfs.
- In some cases, remnant planting patterns (even single trees) uphold the historic character of an area. Interpretation of these landscape features as historic remnants should occur.
- Mountain slopes have been used for traditional practices for many years, and care should be taken that any significant cultural sites, such as burials and veldkos/medicinal plant resources, are not disturbed.
- Where the historic function of a building/site is still intact, the function has heritage value and should be protected. Please take note of the items listed below:
- Surviving examples (wagon routes, outspans, and commonage), where they are owned in some public or communal way (or by a body responsible for acting in the public interest) and where they are found to be actively operating in a communal way, will have cultural and heritage value and should be enhanced and retained.
- The new roads should display minimum scale designs where possible.
- Maintain traditional movement patterns across rural landscapes or to places of socio-historical value. (a) Avoid privatization or the creation of barriers to traditional access routes. (b) Retain old roadways, which have been replaced by newer roads, for use as recreation trails.
- Respect existing patterns, typologies and traditions of settlement-making by promoting the continuity of heritage features. These include: (a) indigenous; (b) colonial; and (c) current living heritage in the form of tangible and intangible associations to place.
- Respect traditional werf settlement patterns by considering the entire werf as the component of significance. This includes the backdrop of the natural landscape against which it is sited, as well as its spatial structure. Any development that impacts the inherent character of the werf component should be discouraged.

Social Criteria

- Care should be taken that existing functions such as outspan areas (see criteria for these under historic) are not lost in the development stages, as it fulfils an important function within the cultural landscape.
- The local community around the development should benefit from job opportunities created by the proposed development;

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Economic Criteria

- Sheep or game farming should be allowed to continue below the wind turbines, alternatively, the areas below the turbines should be rehabilitated to increase biodiversity in the area.
- Care should be taken to reduce visual impact from surrounding tourism areas, by following the recommendations included in the Visual Impact Assessment

Importantly, these recommendations cannot be used as a one-size-fits-all approach to managing the negative impacts of renewable energy development on significant cultural landscapes. However, they can be used as a guide to ensure that the layers that make up a cultural landscape are conserved and enhanced as part of the creation of new renewable energy layers on the cultural landscape.

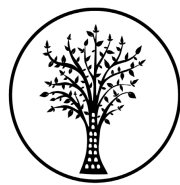
Please feel free to contact me should you have any further questions or concerns in this regard.

Yours sincerely

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Appendix D
Palaeontological Impact Assessment



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18 June 2021

Jo-Anne Thomas
Savannah Environmental

Dear Ms Thomas,

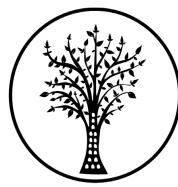
**RE: CULTURAL LANDSCAPE ASSESSMENT AS PART OF THE HERITAGE IMPACT ASSESSMENT
PROCESS IN RENEWABLE ENERGY DEVELOPMENT ZONES**

Legislative Mandate

The National Heritage Resources Act (NHRA, Act 25 of 1999) primarily employs two mechanisms to ensure the effective conservation and management of significant heritage resources. These mechanisms are the Formal Protections detailed in Part I of Chapter II of the NHRA and the General Protections detailed in Part II of Chapter II of the NHRA. Formal Protections include the declaration of National and Provincial Heritage Sites, Heritage Areas as well as the establishment of the Heritage Register. The General Protections include permitting requirements for alterations to structures that are older than 60 years (Section 34) and permit requirements for impacts to archaeological and palaeontological heritage resources (Section 35), amongst others.

Applications for renewable energy developments, in general, fall under section 38 of the NHRA, a section that falls within Part II of Chapter II - the General Protections. This section of the heritage legislation is triggered by developments of a certain scale, size or nature such as the change of character to a site exceeding 5000m². Section 38(8) of the NHRA specifically deals with such developments that also trigger other legislation that requires an assessment of impacts, for example, in terms of NEMA.

Section 38(8) of the NHRA requires that any assessment of impacts from such developments also include an assessment of impacts to heritage resources that satisfies certain criteria detailed in section 38(3) of the NHRA. Section 38(8) also requires heritage authorities to comment on such heritage impact assessments, and that the relevant decision-making authorities (such as the DEFF) take this comment into consideration prior to issuing the authorisation (such as the Environmental Authorisation or equivalent). This is to ensure that any significant heritage resources that may be impacted by the proposed development are identified and appropriately managed or mitigated against impacts prior to authorisation.



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In terms of section 38(3) of the NHRA, it is required that impacts to all heritage resources be assessed in an HIA. “All heritage resources” includes archaeological heritage, palaeontological heritage, the built environment as well as the cultural landscape more broadly.

Cultural Landscape

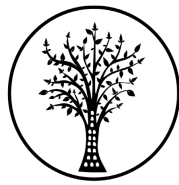
According to Jensen (2020), “The idea of a cultural landscape is fundamental. The term may be given varied meanings, yet, at its core, it unites the products of so-called ‘natural’ ecological processes and phenomena on the one hand, and the products emerging from the processes of transformation of the ‘natural’ site by people in constructing their ‘built’ world, on the other. Any area consists of many sites, most of which have been inhabited by people for thousands of years. These places have been moulded, shaped and changed both by natural processes and by people engaged in adapting the environment to their pursuits.

Cultural landscapes are what one generation inherits from another: in them are embedded values held dear by those gone by. It is the duty and task of any one generation to evaluate that which is inherited and to take appropriate decisions for the future: not only from the perspective of the short-term and how it may be useful to them in a selfish way, but also from a more inclusive communal and longer-term view. It may be considered human nature to act with self-interest, hence the need for government ideals and guidance, such as an appropriate planning and heritage resources control system whereby the longer term and the public good may be addressed responsibly.”

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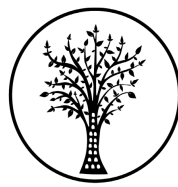
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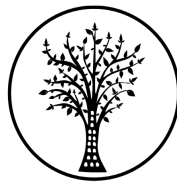
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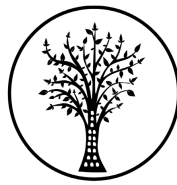


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Yours sincerely

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