



ASHA Consulting (Pty) Ltd
 40 Brassie Street
 Lakeside
 7945

20 August 2020

Aneesah Alwie

Arcus Consultancy Services South Africa (Pty) Ltd

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PAULPUTS SOUTH WIND ENERGY FACILITY GRID CONNECTION: HERITAGE CONSIDERATIONS

Dear Aneesah

Thank you for providing the details of the proposed Paulputs South grid connection. I note that the proposed alignment is identical to that already studied and authorised for the Paulputs Wind Energy Facility but that a battery energy storage system will be added alongside the substation.

The project details for the Paulputs South grid connection and electrical infrastructure are as follows:

Component	Proposed
Holder of Authorisation	Paulputs Wind Energy Facility South (Pty) Ltd
Location of the Site	50 km northeast of Pofadder, Northern Cape Province
Substation C Component	
Area occupied by inverter transformer stations / substations	The O&M complex will form part of the on-site 200m x 200m substation compound of the WEF.
Capacity of on-site substation	132 kV
Grid Connection Component (From Substation C to the existing Eskom Substation)	
Height of pylons	Maximum of 30 m high
Length of transmission line	The line will be approximately 26.5 km long from substation C to the existing Eskom Paulputs Substation, north-west of the N14.
Types of poles used	Both monopoles and lattice structures are being considered
Transmission capacity	Double Circuit, 132 kV line, evacuating a maximum of 300MW
Area occupied by both permanent and construction laydown areas	Laydown areas used are the same as for the WEF, i.e. approximately 4 hectares (To allow for a 0.5 hectare office block, 1 hectare permanent laydown and 1 hectare temporary laydown and will include authorisation of a BESS
Area occupied by buildings	The O&M complex will form part of the on-site 200m x 200m substation compound of the WEF.

ASHA Consulting (Pty) Ltd

Reg. no.: 2013/220482/07 | Directors: Jayson Orton & Carol Orton

40 Brassie Street, Lakeside, 7945 | T: 021 788 1025 | C: 083 272 3225

Jayson@asha-consulting.co.za | Carol@asha-consulting.co.za | www.asha-consulting.co.za

Width of Servitude Road	3 – 6 m wide
Servitude Road	26.8 km (worst case scenario)
Site access	N14 (including for abnormal loads)
Height of fencing	Maximum 3m only around the on-site substation and buildings
Type of fencing	Wired mesh / chain link fence not electrified

The content of this letter is based on the information generated during the original impact assessment process and presented in the project Heritage Impact Assessment (HIA). The relevant report is:

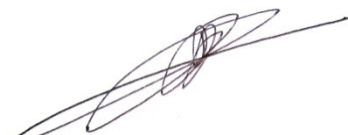
Orton, J. 2019. Heritage Impact Assessment: proposed Paulputs Wind Energy Facility and associated Grid Connection near Pofadder, Kenhardt Magisterial District, Northern Cape. Unpublished report prepared for Arcus Consultancy Services South Africa (Pty) Ltd. Lakeside: ASHA Consulting (Pty) Ltd.

Given that the project has been studied in its entirety, no new/unanticipated impacts are envisaged aside from a very minor potential increase in cumulative impacts. In light of the already authorised electrical projects in the area, including some that are already in operation, the intensity of this increase is deemed to be negligible. The site and its surrounds have already had an electrical layer added to the cultural landscape and the change proposed by the present project will be negligible. As such, all assessment ratings provided in the original impact assessment continue to apply.

The recommendations contained in the original HIA require modification to suit the present project for which authorisation is now sought. The recommendations to be carried forward in the new authorisation for the Paulputs South WEF Grid Connection are thus as follows:

- The final authorised layout for the power line, substation, battery storage system and any other areas to be disturbed must be surveyed by an archaeologist prior to construction in order to identify any remaining potential impacts that may need mitigation;
- Identified sensitive sites must be treated as no-go areas throughout the lifetime of the project. These are to be confirmed during the pre-construction survey;
- If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

Yours sincerely



Jayson Orton

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Figure 1: The alignment corridor considered by this opinion letter. The substation and battery energy storage system would be located at the southern end of this corridor. The small yellow polygons denote buffers around archaeological sites identified as having cultural significance during the survey, while the orange ones show potentially sensitive areas in the vicinity of the grid connection alignment.

Site verification report

A site sensitivity verification was undertaken in order to confirm the current land use and environmental sensitivity of the proposed project area. The details of the site sensitivity verification are noted below:

Date of Site Visit	30 November to 2 December 2018 but approximately half of the corridor was not accessible at the time of the survey.
Specialist Name	Dr Jayson Orton
Professional Registration Number	ASAPA: 233; APHP: 043
Specialist Affiliation / Company	ASHA Consulting (Pty) Ltd

- Provide a description on how the site sensitivity verification was undertaken using the following means:

- (a) desk top analysis, using satellite imagery;
- (b) preliminary on -site inspection; and
- (c) any other available and relevant information.

Initial work was carried out using satellite aerial photography in combination with the author's accumulated knowledge of the local landscape. This was used to provide sensitivity data. Subsequent fieldwork served to ground truth the site, including areas identified as potentially sensitive (but not in the section that was inaccessible). Desktop research was also used to inform on the heritage context of the area.

- Provide a description of the outcome of the site sensitivity verification in order to:

- (a) confirm or dispute the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.;
- and
- (b) include a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity.

The map below is extracted from the screening tool report and shows the archaeological and heritage sensitivity to be generally medium. The site visit showed that in fact the majority of the site is of low sensitivity with only small pockets (where archaeological resources were found) considered to be of medium sensitivity. No such pockets were found within the surveyed part of the corridor, but some are likely to occur in the unsurveyed section. Figure 1 (above) shows the areas considered to be archaeologically sensitive. Since none of the sites were of high cultural significance, these can all be considered as medium sensitivity areas. A photographic record and description of the relevant heritage resources is contained within the impact assessment report.

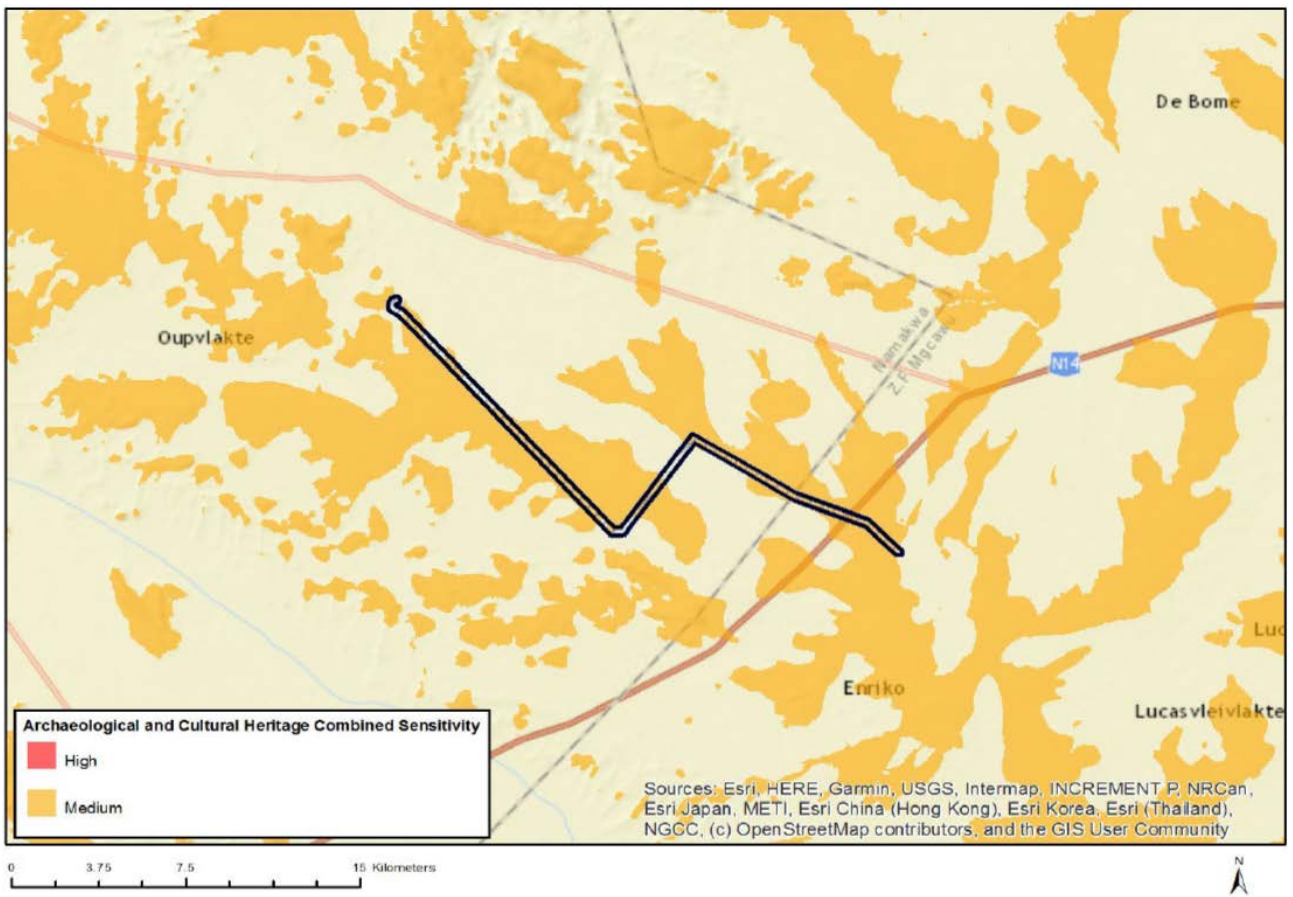
The screening tool report contains no palaeontological map which indicates 100% low sensitivity. This is in lone with the specialist study conducted during the impact assessment phase.

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Screening tool map: archaeological and cultural heritage theme.



environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

DETAILS OF THE SPECIALIST, DECLARATION OF INTEREST AND UNDERTAKING UNDER OATH

File Reference Number:	(For official use only)
NEAS Reference Number:	DEA/EIA/
Date Received:	

Application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

PROJECT TITLE

PROPOSED AMENDMENT OF THE AUTHORISED PAULPUTS WIND ENERGY FACILITY, NORTHERN CAPE PROVINCE

Kindly note the following:

1. This form must always be used for applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting where this Department is the Competent Authority.
2. This form is current as of 01 September 2018. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.environment.gov.za/documents/forms>.
3. A copy of this form containing original signatures must be appended to all Draft and Final Reports submitted to the department for consideration.
4. All documentation delivered to the physical address contained in this form must be delivered during the official Departmental Officer Hours which is visible on the Departmental gate.
5. All EIA related documents (includes application forms, reports or any EIA related submissions) that are faxed; emailed; delivered to Security or placed in the Departmental Tender Box will not be accepted, only hardcopy submissions are accepted.

Departmental Details

Postal address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Private Bag X447
Pretoria
0001

Physical address:

Department of Environmental Affairs
Attention: Chief Director: Integrated Environmental Authorisations
Environment House
473 Steve Biko Road
Arcadia

Queries must be directed to the Directorate: Coordination, Strategic Planning and Support at:
Email: EIAAdmin@environment.gov.za

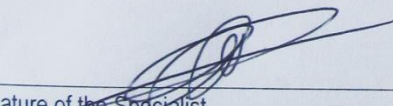
1. SPECIALIST INFORMATION

Specialist Company Name:	ASHA Consulting (Pty) Ltd		
B-BBEE	Contribution level (indicate 1 to 8 or non-compliant)	4	Percentage Procurement recognition
Specialist name:	Dr Jayson Orton		
Specialist Qualifications:	D.Phil (Archaeology, Oxford, UK) MA (Archaeology, UCT)		
Professional affiliation/registration:	ASAPA CRM member No. 233 APHP member No. 043		
Physical address:	23 Dover Road, Muizenberg, 7945		
Postal address:	23 Dover Road, Muizenberg		
Postal code:	7945	Cell:	083 272 3225
Telephone:	021 788 1025	Fax:	n/a
E-mail:	jayson@asha-consulting.co.za		

2. DECLARATION BY THE SPECIALIST

I, JAYSON ORTON, declare that –

- I act as the independent specialist 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 the specialist report relevant to this application, 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 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;
- all the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the Act.



 Signature of the Specialist

ASHA CONSULTING (PTY) LTD

 Name of Company:

21-07-2021

 Date

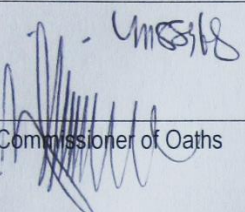
3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, JAYSON ORTON, swear under oath / affirm that all the information submitted or to be submitted for the purposes of this application is true and correct.

Signature of the Specialist 

ASHA CONSULTING(PTY) LTD
Name of Company

21-07-2021
Date


Signature of the Commissioner of Oaths

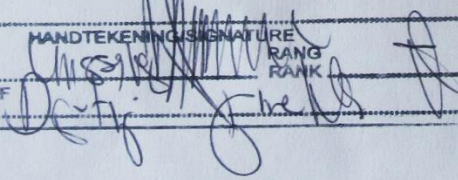
2021-07-21
Date

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IS VAN DIE OORSPRONKLIEKE DOKUMENT WAT AAN MY VIR WAARNEEMING
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