



an agency of the
Department of Arts and Culture

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CaseID: 14388

Date: Thursday April 14, 2022
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Final Comment

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

Attention: EDF Renewables (Pty) Ltd

Phezukomoya WEF Final EMPr and Site Layout

Arcus Consultancy Services South Africa (Pty) Ltd has been appointed by Phezukomoya Wind Power (Pty) Ltd to undertake an Environmental Authorisation (EA) Amendment Application to amend the authorised Phezukomoya Wind Energy Facility (WEF), near Noupoort in the Northern and Eastern Cape Province (DEA Ref. No. 14/12/16/3/3/2/1028 and 14/12/16/3/3/2/1028/AM1).

A Final Comment was issued on the 13/12/2019 (<https://sahris.sahra.org.za/node/532004>) noting no objections to the proposed amendment and provided conditions to be implemented as part of the EMPr.

Since the issuing of the Final Comment, the Final EMPr inclusive of a Heritage Management Plan (HMP) and Heritage Walkthrough report have been submitted for comment.

Gribble, J and Euston-Brown, G. 2022. Pre-Construction Archaeological Walkdown Report for the Phezukomoya Wind Energy Facility outside Noupoort in the Northern Cape.

The 2021 walkthrough identified an additional 19 new heritage resources which include five heritage resources that will be impacted by the proposed development. These include surface scatters of Stone Age lithics, stone kraal, historical farm ash heap containing historical artefacts and a system of field boundary walls. It must be noted that no photographs of the newly identified sites have been provided in the report.

The walkthrough report also contains the management principles contained within the HMP as part of the EMPr.

Recommendations provided in the report and HMP include the following:

- The position of the proposed wester boundary of the laydown area within which site J101 is located is shifted 50 m eastwards so that the site can be avoided and no-go area of 20 m is established around J101. Alternatively, the archaeological material on the site must be collected by an archaeologist prior



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to construction taking place;

- The cable/road alignment to the WTG201-209 string is shifted at least 30 m eastwards of its current alignment in the vicinity of the stone kraal J104-J106/G104-G106) to ensure that this site is not impacted. In addition, a no-go area of 20 m must be established around the area defined by the waypoints J104-J106 and G104-G106;
- The dense Lockshoek lithic scatter (J128-J130/G015-G016) lies directly on the cable/road alignment and should be archaeological sampled and collected by a professional archaeologist prior to the commencement of construction work;
- The historical farm ash heap defined by J1351 and G023 lies directly on the cable/road alignment and should be archaeological sampled by a professional archaeologist prior to the commencement of construction work;
- If possible, the size of the laydown area on the farm Vrede within which the system of boundary walls (J137-H139/J141/G026-G030) is located should be reduced to avoid impact to these walls;
- The rock shelter, MSA lithics and historical kraal at JG040 must be cordoned off during construction activities and treated as a no-go area by the WEF staff and contractors. The no-go area must include the mapped extent of this site;
- A 20 m no-go area must be implemented around JG029;
- The well-preserved "wolwehok" (JG031/JR022) on the road up onto the Afrikaberg must be placed off limits and protected from any potential impacts associated with the construction of the WEF;
- The areas recorded as JG025/JG026/JR018 and JG027/JR019 must be cordoned off during construction activities and treated as a no-go area by WEF staff and contractors;
- No mitigation was required for the packed stone wall between JG033 and JG034, which will need to be breached for the cable/road. However, damage to the wall must be kept to a minimum and the required breach kept as small as possible.

Final Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit is satisfied with the submitted Heritage Walkthrough report and Heritage Management Plan. The following must be taken into consideration and be addressed:

- Labelled photographs of the heritage resources identified in the 2021 survey must be submitted to SAHRA;
- A 50 m no-go buffer must still be adhered to around the identified fossil vertebrate burrows on the farm

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Winterhoek as stated in the conditions of the Final Comment issued on the 13/12/2019;

- Any artefact collection or archaeological excavations are subject to a section 35 of the NHRA permit application process. Permits for mitigation measures must be applied for from SAHRA prior to the construction phase;
- It must be noted that SAHRA is also the heritage authority responsible for palaeontological resources in the Northern Cape. Additionally, any built structures that are older than 100 years and in ruin are defined as archaeological resources, and SAHRA is therefore the responsible heritage authority. Any structures old than 60 years, but younger than 100 years and are still in use, are under the responsibility of the NCPHRA. This must be taken into account with regards to section 25.2 of the EMP.

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

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

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Direct URL to case: <https://sahris.sahra.org.za/node/529286>
(DEA, Ref: Phezukomoya Split 1 WEF (DFFE Reference: 14/12/16/3/3/2/1028, 14/12/16/3/3/2/1028/AM1, and 14/12/16/3/3/2/1028/1/AM1))

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.