



an agency of the
Department of Arts and Culture

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CaseID: 14388

Date: Monday October 28, 2019
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Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mr Sheldon Vandrey
Mainstream Renewable Power South Africa (Pty) Ltd

EA amendment application for Phezukomoya WEF

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 draft Motivation Report has been submitted in terms of the National Environmental Management Act, No 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations. The proposed amendments include splitting the authorised Phezukomoya WEF into two project areas (Phezukomoya Split 1 and Hartebeesthoek West). The Phezukomoya WEF will consist of 35 turbines with an amended layout.

ACO Associates cc were appointed to provide the heritage specialist component as part of the EA Amendment application in terms of section 24(4)b(iii) of the NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Gribble, J and Euston-Brown, G. 2019. Archaeological Amendment Report: Phezukomoya Wind Energy Facility, Noupoort, Northern Cape.

The amendment layout was assessed by the heritage specialists and it was found that no disadvantages arising from the revised WEF layout were identified with respect to archaeological resources

and the following recommendations have been provided:

- The stone artefact scatter JG025/ JG026/ JR018 will be affected by the current cable/ road alignment. The archaeological material on the site must either be collected by an archaeologist prior to construction work or the cable/ road alignment adjusted to avoid the site. If the latter option is chosen, the site must be cordoned off during construction activities and treated as a no-go area by WEF staff and contractors;



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- JG027/ JR019 is sufficiently distant from the cable/ road alignment not to be directly impacted. It is recommended, however, that site is cordoned off during construction activities and treated as a no-go area by WEF staff and contractors;
- The dense scatter of MSA lithics at JG039 is sufficiently distant from the cable/ road alignment not to be directly impacted. It is recommended, however, that site is cordoned off during construction activities and treated as a no-go area by WEF staff and contractors; and
- The rock shelter, MSA lithic scatter, and historical kraal wall at JG040 must be cordoned off during construction activities and treated as a no-go area by WEF staff and contractors;
- No mitigation is 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 should be kept to a minimum, and the required breach kept as small as possible;
- The 2018 Environmental Management Programme for the Phezukomoya WEF requires no change in respect of the assessment of impacts on archaeological sites and materials but will need to be updated to reflect the revised mitigation measures recommended in this amendment report;
- Provided that the mitigation measures recommended in this report are implemented, the overall impact of the construction of the Phezukomoya WEF is tolerable and generally of low significance and, from a heritage perspective, the proposed amendments are considered acceptable.

Interim Comment

**Please note that this comment is issued for the Northern Cape section of the development only. Eastern Cape Provincial Heritage Resources Authority (ECPHRA) must be consulted with regards to comments for the Eastern Cape section of the proposed development.*

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests that an assessment of the impact of the proposed amendments to palaeontological resources be conducted as part of the EA Amendment application.

SAHRA advises the applicant to extend the EA Amendment Application process in terms of section 32(1)b of the NEMA EIA regulations in order to comply with the comment.

Further comments will be issued upon receipt of the requested study.

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

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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:

Direct URL to case: <http://www.sahra.org.za/node/529286>
(DEA, Ref: Phezukomoya WEF (DEA Ref. No. 14/12/16/3/3/2/1028 and 14/12/16/3/3/2/1028/AM1))