

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Natasha Higgitt
Tel: 021 462 4502
Email: nhiggitt@sahra.org.za
CaseID: 16890

Date: Monday August 30, 2021
Page No: 1

Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: WKN Windcurrent SA (Pty) Ltd

P.O. Box 762
Wilderness
6560

Paulputs Wind Energy Facility (RF) (Pty) Ltd ('PWEF'), a wholly owned subsidiary of WKN Windcurrent SA (Pty) Ltd, was granted environmental authorisation for the 300 MW (75 Turbine) Paulputs Wind Energy Facility (WEF) and its associated 132 kV grid connection on 11 December 2019 by the Department of Forestry, Fisheries and Environment (DFFE) (DFFE Reference No. 14/12/16/3/3/2/1120) (Figure 1). PWEF are proposing to give permission to Paulputs Wind Energy Facility North (RF) (Pty) Ltd and Paulputs Wind Energy Facility South (Pty) Ltd to split and amend the Environmental Authorisation (EA) into three amendment applications for EA. The summary of each amendment application is defined below: - Paulputs North Amendment: Paulputs Wind Energy Facility North (RF) (Pty) Ltd ('Paulputs North' – The Applicant) intends to construct and operate a 150MW WEF (Paulputs North WEF) consisting of up to 40 turbines, with a hub height of up to 180m, blade length of up to 110m and a rotor diameter of up to 220m. This authorisation will also include the authorised Paulputs WEF preferred on-site substation and a proposed Battery Energy Storage Facility in the area authorised for temporary laydown. All infrastructure is to be located on the western side of the N14 Highway. This amendment application and report will be referred to as the 'proposed amendment'; - Paulputs North Grid Connection Amendment: PWEF give permission to Paulputs Wind Energy Facility North (RF) (Pty) Ltd to remove the authorised 132 kV Grid Connection (Option C) from its authorisation in favour of ownership by Paulputs Wind Energy Facility North (RF) (Pty) Ltd ('Paulputs North') for use at the Paulputs North WEF site. The approved grid connection will be taken over by Eskom in the future and thus requires its own Environmental Authorisation; and - Paulputs South Amendment: Paulputs Wind Energy Facility South ('Paulputs South') intends to construct and operate a 150MW WEF (Paulputs South WEF) consisting of up to 35 turbines, with a hub height of up to 180m, blade length of up to 110m and a rotor diameter of up to 220m. The focus of this amendment report is on the Paulputs South WEF Amendment. The majority of the same specialists were commissioned for this amendment report, with exception of the Avifaunal study. The original Avifaunal study for the approved Paulputs WEF EIA was undertaken by Andrew Pearson whom is no longer an employee of

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Arcus. Dr Owen Davies has replaced Andrew and undertook an additional site visit in February 2020 to verify the information contained in the approved Paulputs WEF Avifaunal specialist report. Dr Davies' avifaunal report and site verification report are contained in Volume II of this report

Arcus Consultancy Services South Africa (Pty) Ltd has been appointed by Paulputs Wind Energy Facility South (RF) (Pty) Ltd to conduct an Environmental Authorisation (EA) Amendment Application for the authorised Paulputs Wind Energy Facility, near Rooikoenap, Northern Cape Province (14/12/16/3/3/2/1120).

A draft Amendment Assessment Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA EIA Regulations. The proposed amendments include the splitting of the original EA into three EAs (North, South and a separate EA for the grid infrastructure). Other amendments include the increase in blade length and hub heights of the wind turbines. The Paulputs North WEF will consist of 35 turbines associated infrastructure on the south east side of the N14. The turbine layout has been altered slightly.

SAHRIS Case ID 13356 has reference (<https://sahris.sahra.org.za/cases/paulputs-wind-energy-facility-northern-cape-province>). In a Final Comment issued on the 16/08/2019, SAHRA noted no objections to the development and provided conditions (<https://sahris.sahra.org.za/node/527055>).

ASHA Consulting has been appointed to provide heritage specialist input as part of the EA Amendment process as required by section 24(4)b(iii) of NEMA, and in terms of section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 38(8) of the NHRA.

Orton, J. 2020. Paulputs Wind Energy Facility Split: Heritage Considerations

The specialist has confirmed that no heritage resources will be impacted by the project design and no change in the impact ratings will occur. The specialist stated that the pre-construction survey of the road layout will still need to be conducted as recommended in the original HIA.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final Amendment Report and EMP:

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- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) has no objections to the proposed amendment to the authorised development;
- 38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:
- The conditions contained in the Final Comment issued on the 16/08/2019 on SAHRIS Case ID 13356 (<https://sahris.sahra.org.za/node/527055>) are still valid and must be adhered to;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
 - The Final Amendment Report and EMPr must be submitted to SAHRA for record purposes;
 - The decision regarding the EA Amendment Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

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

Yours faithfully

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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: <https://sahris.sahra.org.za/node/579281>
(DEA, Ref:)

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.